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August 12, 2024

Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street SW
Washington, DC 20024

Re: Student Transportation of America, Inc. Et al. – Acquisition of Control – West Point
Tours, Inc. STB Docket No. MCF 21121

Dear Ms. Brown:

Enclosed for filing in the above referenced docket is a verified application of Student
Transportation of America, Inc. The filing fee has been submitted via pay.gov.

If you have any questions related to this filing, please let me know.

Sincerely,

Justin J. Marks
Counsel to Applicant

Enclosure

FILED
August 12, 2024
SURFACE
TRANSPORTATION BOARD

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August 12, 2024
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TRANSPORTATION BOARD

Before the
SURFACE TRANSPORTATION BOARD

Docket No. MCF 21121

STUDENT TRANSPORTATION OF AMERICA, INC. ET AL.
– ACQUISITION OF CONTROL –
WEST POINT TOURS, INC.

VERIFIED APPLICATION OF
STUDENT TRANSPORTATION OF AMERICA, INC.
UNDER 49 U.S.C. 14303

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Attorneys for Applicant

Dated: August 12, 2024

Before the
SURFACE TRANSPORTATION BOARD

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I. INTRODUCTION AND SUMMARY

This application is filed by Student Transportation of America, Inc. (“STA”) and by its direct and indirect parent entities shown in Appendix B attached hereto. Applicant STA is a noncarrier in control of multiple passenger motor carriers that hold operating authorities issued by the Federal Motor Carrier Safety Administration (“FMCSA”). STA and its parent entities hereby seek approval from the Surface Transportation Board (“STB” or “Board”) to acquire all voting securities of West Point Tours, Inc. (“WPT”), an additional passenger motor carrier that holds operating authority issued by FMCSA. Although WPT, STA and STA’s current carrier subsidiaries primarily provide school bus transportation under contracts with local school districts, a service which is covered by broad exemptions from FMCSA regulation (see 49 USC § 13506(a)(1)), approval by the STB of the current transaction (the “Proposed Acquisition”) is required under 49 U.S.C. 14303. This is because WPT, like many current STA subsidiaries, does use its school buses for charter and special operations under FMCSA authority when they are not engaged in transportation of students to and from schools. WPT also operates a limited number of motor coaches which are used on charter trips. The current STA subsidiaries are identified in section II(2) of this application and related exhibits.

II. INFORMATION REQUIRED UNDER 49 C.F.R. 1182.2(A)(1) THROUGH (A)(10)

(1) Full names and physical addresses of each party to the Proposed Acquisition:

Student Transportation of America, Inc.
3349 Highway 138
Building A, Suite C
Wall, NJ 07719

West Point Tours, Inc.
1047-1049 Route 94
New Windsor, NY 12553

(2) Pertinent FMCSA and intrastate operating authorities included in Proposed Acquisition:

- Current STA subsidiaries – see Exhibit A for physical addresses, FMCSA operating authorities and safety ratings. All safety ratings are Satisfactory for those subsidiaries that have received them.
- WPT – USDOT 42238, MC-95375, Satisfactory safety rating.

WPT also engages in regulated intrastate transportation in **Pennsylvania (authority no. 2578-465) and New York state (authority no. 20295)**. Applicant notes that 49 U.S.C. 14303(f) provides as follows: “A [passenger] carrier, corporation, or person participating in the approved ... transaction is exempt from the antitrust laws and from *all other law, including State and municipal law, as necessary to let that person carry out the transaction, hold, maintain, and operate property, and exercise control or franchises acquired through the transaction*” (emphasis added). Accordingly, the change in control of WPT sought through this application would authorize Applicant’s control of the intrastate operating authorizations WPT holds. See, e.g., Colorado Mountain Express, Inc. et al. – Consolidation and Merger – Colorado Mountain Express, Docket No. MCF 20902 (STB served November 8, 1996).

(3) Brief Summary of the Proposed Acquisition:

A definitive agreement executed on July 17, 2024, provides for control of WPT to be acquired by STA subject to approval by the Board. STA and WPT expect to close the Proposed Acquisition in the fourth quarter of 2024.

WPT transports approximately 9,640 students per day during school years and 450 students per day for summer periods. It has approximately 200 drivers operating a fleet of 220 vehicles. Approximately fifteen of the vehicles are motor coaches; the remainder are school buses. School transportation accounts for an estimated seventy-five percent of WPT annual revenues of \$21 million, with the remainder being derived from charter and special operations centered on the West Point Military Academy and nearby areas of the Hudson River valley in New York state. WPT handles approximately 24,000 charter passengers per year in interstate motorcoach travel.

STA estimates that its current subsidiaries in the United States and Canada transport approximately 1,250,000 students per day based on a 180-day school year. These school transportation operations serve more than 300 school districts across North America, including at least 20 states. Founded in 1997, STA and its affiliates currently have approximately 23,000 employees and utilize an estimated 22,000 vehicles. Exempt school transportation accounts for approximately ninety-seven percent of STA annual revenues of about US \$1.3 billion, with the remainder being derived from charter and special operations not involving school transportation. STA estimates that its approximate share of the North American market for school transportation outsourced to private-sector providers is approximately ten percent, while its market share in non-school charter and special operations is less than five percent. These respective market shares are expected to remain approximately the same upon closing of the Proposed Transaction.

(4) Description of involved motor passenger carriers and intercorporate structure:

Upon closing of the Proposed Acquisition, WPT will become a direct subsidiary of Student Transportation of America, Inc., which in turn is a subsidiary of Student Transportation of America Holdings, Inc, a Delaware corporation and a noncarrier. In turn, the latter corporation is a subsidiary of Spinner US Acquireco, Inc., also a Delaware corporation and a noncarrier, which will continue under the majority ownership of Caisse de dépôt et placement du Québec, a pension fund based in the Canadian province of Quebec. Attached as Exhibit B is a complete chart of STA's current intercorporate structure from top to bottom.

(5) Jurisdictional Statement:

STA and WPT hereby certify that as of a consecutive 12-month period ending two years before the execution date of their acquisition agreement, their combined gross operating revenues from passenger motor transportation (including interstate, intrastate, foreign, regulated and unregulated services) exceeded the Board's jurisdictional threshold of USD \$2 million under 49 USC 14303. As noted above, however, the great preponderance of their separate and combined revenues are derived from exempt school transportation.

(6) Environmental and Energy Impacts:

STA and WPT hereby certify that the Proposed Acquisition will not significantly affect the quality of the human environment or the conservation of energy resources. Because of the contract-based nature of the passenger transportation operations of WPT and current STA subsidiaries (in addition to the structure of the Proposed Acquisition as a transfer of voting securities rather than assets), those parties will continue under legal obligations to perform their existing contracts to provide passenger services. If anything, energy and environmental impacts will be positive because of the well-known fuel-economy benefits of using public transit in lieu of the private automobile for personal mobility. Moreover, efficiency benefits should result from

use of school buses for some of these carriers' charter and special operations during periods when those vehicles are not needed for school transportation.

(7) Consistency of Proposed Acquisition with the Public Interest:

Under 49 U.S.C. 14303(b), Applicant must demonstrate that approval of the Proposed Acquisition will be "consistent with the public interest" by reference to:

- "Adequacy of transportation to the public,"
- "Total fixed charges" resulting from the transaction, and
- "The interest of carrier employees affected by" the transaction.

These matters will now be addressed in turn.

(a) *Service Adequacy:* Because of the contract-driven nature of the outsourced passenger transportation services involved here, WPT and STA have every incentive to maintain and improve the adequacy of their services to the public. While the contracts involved are typically for multi-year terms, renewal of such agreements is by no means a foregone conclusion. Contract renewals in the school transportation sector often involve highly visible and intense negotiation processes between multiple bidders, governmental bodies, unions, political activists and other interested parties. Thus, STA will have strong incentives to maintain high service levels in order to fend off competitive bids from a wide variety of national, regional and local providers – along with the ever-present alternative for local governments, school districts, parochial schools and other contracting parties to take transit in-house again.

(b) *Fixed Charges:* Applicant has no current plans to finance the Proposed Acquisition in a manner that would affect fixed charges payable by STA or its affiliates. Instead, funding for the acquisition will be drawn from STA's current credit facility, and WPT (like other STA subsidiaries) will become a co-obligor under that facility.

(c) *Effect on Carrier Employees:* For reasons already discussed, it is highly unlikely that the employees of WPT would be adversely affected to any significant degree by the Proposed Acquisition. WPT, like STA and its current subsidiaries, will retain *both* contractual obligations to provide outsourced transportation services *and* competitive incentives to maintain and improve existing services, in order to improve their chances of success when new outsourcing opportunities arise or when existing contracts are re-competed. Moreover, WPT, STA and their competitors are faced with a longstanding shortage of qualified drivers and maintenance personnel. Far from contemplating staff cuts, passenger carriers such as STA and its subsidiaries are actively recruiting additional employees who can meet the qualifications specified by FMCSA and other agencies. WPT and STA thus do not have, and rationally could not have, any intention of significantly reducing employment levels involving drivers, dispatchers or vehicle maintenance personnel as a result of the Proposed Acquisition. Compare No. MCF 21042, Student Transportation of America – Control – Dairyland Buses, Inc., STB served December 14, 2011 (outsourced school transportation provider subject to market discipline from re-bidding of contracts or from potential decisions of school authorities to take such operations back in-house).

(8) Certification as to FMCSA Safety Fitness Ratings:

Applicant certifies that section II(2) and Appendix A, *supra*, accurately set forth all FMCSA safety ratings held by the motor passenger carriers to be operated under common control upon closing of the Proposed Acquisition.

(9) Certification as to Required Insurance Coverage:

Applicant certifies that WPT and each of the passenger carriers listed in section II(2) and Appendix A holds the required amount of bodily injury and property damage insurance pursuant to 49 U.S.C. 13906 and that required evidence of such insurance is on file with the FMCSA.

(10) Certification as to Mexican Ownership/Domicile:

Applicant certifies that no party to the Proposed Acquisition is owned or controlled by persons domiciled in Mexico.

(11) Certification under 21 U.S.C. 862 (disqualification of individuals convicted of certain criminal violations):

Inapplicable, as none of the operating authorities involved in the Proposed Acquisition are held by, or will be transferred to, an individual who will hold the authority in his or her name.

III. REQUIREMENTS FOR SERVICE OF DOCUMENTS UNDER 49 C.F.R. 1182.3(A)(1)

A copy of this application is being served on pertinent regulatory authorities of each State in which WPT holds intrastate passenger motor carrier authority. On the federal level, a copy is being served on FMCSA's Office of Registration and Safety Information. Please note that the Proposed Acquisition does not meet the "size of transaction" threshold for review by the Federal Trade Commission or the United States Department of Justice, Antitrust Division, under the Hart-Scott-Rodino Antitrust Improvements Act of 1976, 15 USC 18a.

[Remainder of Page Intentionally Left Blank]

IV. CONCLUSION

Accordingly, STA and WPT request that the Board approve this application pursuant to 49 U.S.C. 14303(f).

Respectfully submitted,

/s/ Mark J. Andrews

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Justin J. Marks (202-772-0916)
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jmarks@clarkhill.com

Attorneys for Applicant

Dated: August 12, 2024

Attachments:

Exhibit A – Current STA Subsidiaries Regulated by FMCSA

Exhibit B – Current STA Intercorporate Structure

VERIFICATION

Under penalty of perjury, I hereby verify on behalf of West Point Tours, Inc. that the foregoing is true and correct insofar as it relates to that company. Further, I certify that I am qualified and authorized to file this Verification.

Executed on August 12, 2024.

/s/ Robert Brisman

Printed Name: Robert Brisman

Title: President

VERIFICATION

Under penalty of perjury, I hereby verify on behalf of Student Transportation of America, Inc. that the foregoing is true and correct insofar as it relates to that company and its affiliates.

Further, I certify that I am qualified and authorized to file this Verification.

Executed on August 12, 2024.

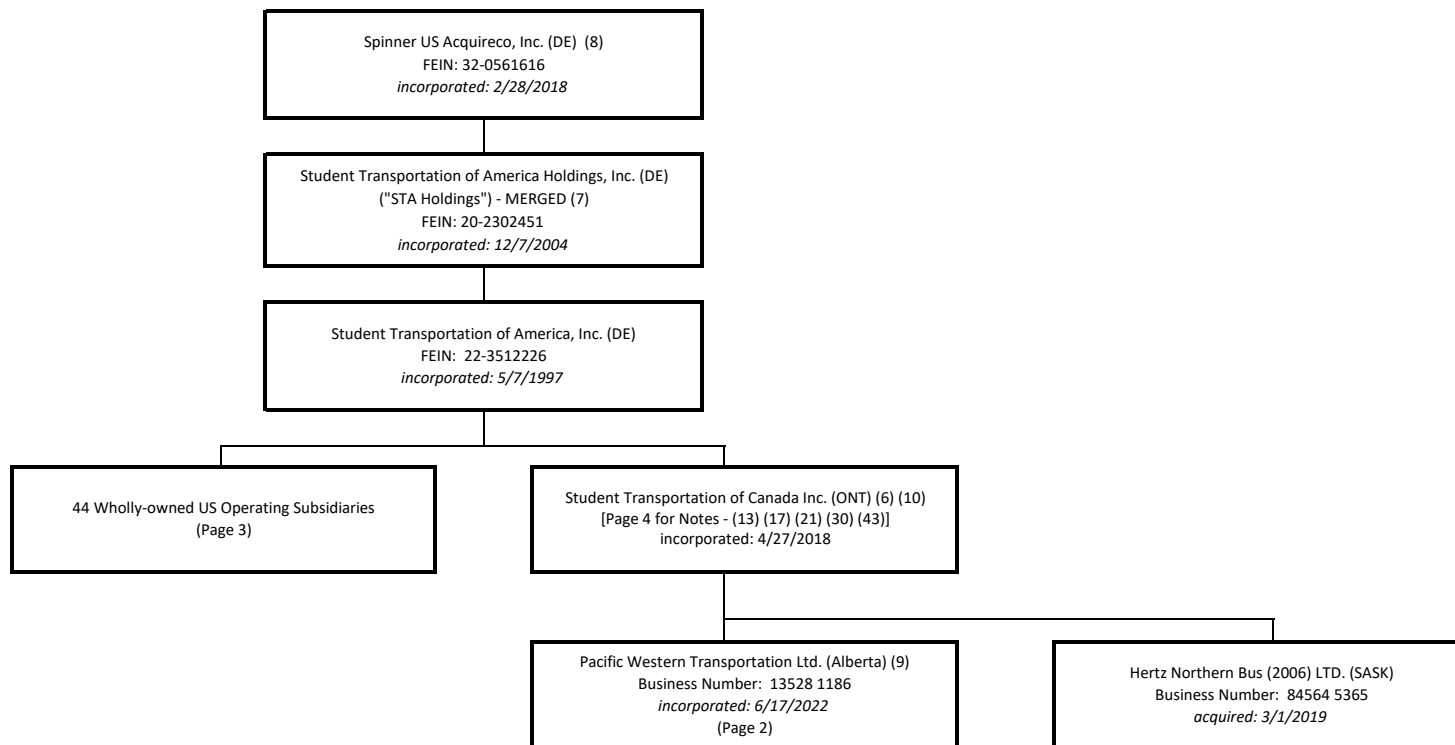
/s/ Gene Kowalczewski

Printed Name: Gene Kowalczewski

Title: President and CEO

Exhibit A

Spinner US Acquireco, Inc.
Corporate Entity Chart
As At July 1, 2024



(6) April 24, 2018 Student Transportation of America ULC transitioned from Nova Scotia to Ontario in order to amalgamate with Parkview Transit Inc. and Student Transportation of Canada, Inc.. On April 27, 2018, Spinner CanAcquireCo Inc. purchased all shares of STI under the Plan of Arrangement and then amalgamated with Student Transportation of Canada, Inc.

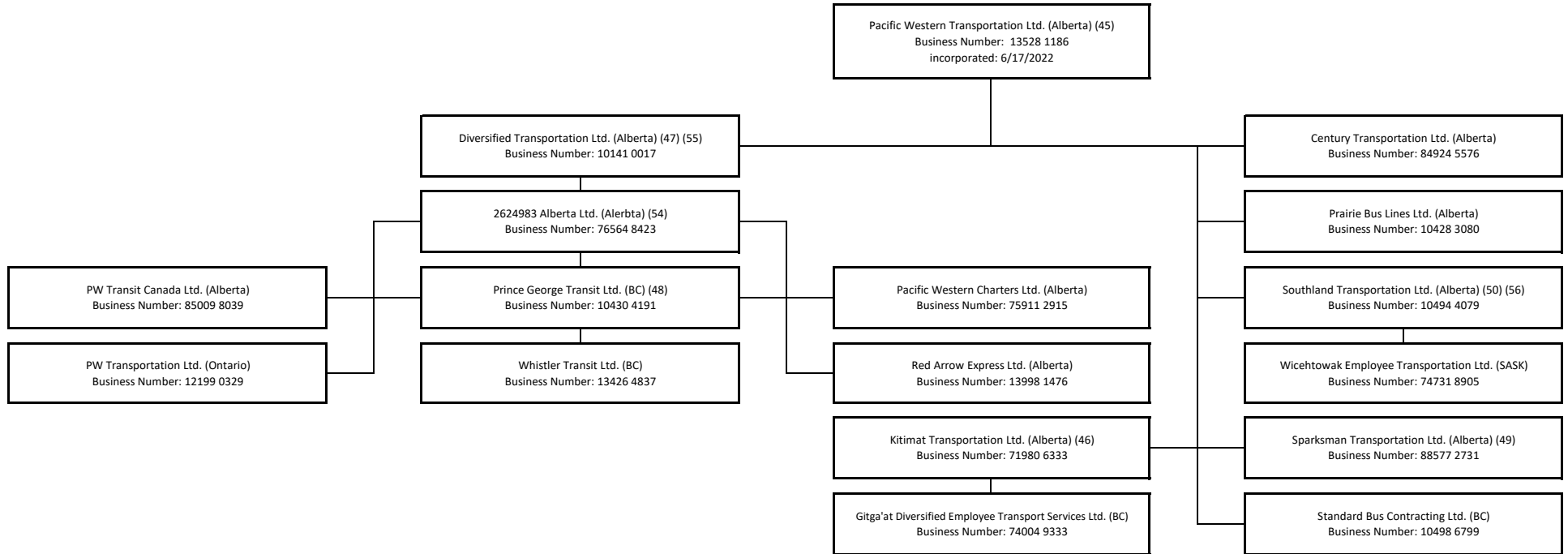
(7) April 27, 2018 Spinner US Financeco Inc. merges with STA Holdings, which continues as the surviving corporation. Upon the merger all property and liabilities of Spinner US Financeco Inc. becomes property and liabilities of STA Holdings.

(8) As of April 27, 2018 Spinner US Acquireco, Inc. is the top consolidated US legal entity with 2 investors (1) CDP Groupe Infrastructures, Inc. (CA) at 79.9% and (2) Ullico Infrastructure STI Holdings LLC (US) at 20.1%

(9) As of June 17, 2022 STC PWT BIDCO, Inc. (Alberta) Business Number: 2024365732 amalgamated with Pacific Western Transportation Ltd. (Alberta). Remaining Business Number 13528 1186

(10) As of January 15, 2024 Newry Coach Lines Ltd. (Ontario) Business Number: 10386 9749 amalgamated with J C & T Transportation Consultants, Inc. (Ontario) Business Number: 84273 4501 and Newood Holdings, Inc. (Ontario) Business Number: 77870 0468. Remaining Business Number 10386 9749. The acquisition is deemed to have occurred on January 1, 2024. Successor by amalgamation with Newry Coach Lines Ltd. on 07/01/2024.

Spinner US Acquireco, Inc.
Corporate Entity Chart
As At July 1, 2024



(45) Successor by amalgamations of Pacific Western Transportation Holdings, Ltd. and Pacific Western Transportation Ltd. on 01/19/2019

(46) Owns 49% of Gitga'at Diversified Employee Transport Services Ltd.. The other 51% is owned by the Gitga'at First Nation. This entity performs bus services in the Kitimat region with partial Indigenous ownership

(47) Owns 100% of PW Transit Canada Ltd.

(48) Owns 100% of Whistler Transit Ltd.

(49) Mark Critch is sole registered shareholder of Sparkman Transportation Ltd. and holds the shares in trust for beneficial holder Pacific Western Transportation Ltd.

(50) Southland Transportation Ltd. owns 49% of the shares of Wicehtowak Employee Transportation Ltd., with the remaining 51% held by George Gordon Developments Ltd..

This entity does not own any assets, and represents the commercial vehicle pursuant to which contracts are acquired and subcontracted to PWT.

(51 through 53) See page 4

(54) Incorporated on June 21, 2024

(55) Effective June 24, 2024 Diversified Transportation Ltd. entered into rollover agreements with: Pacific Western Transportation Ltd., Prince George Transit, Ltd., and 2624983 Alberta Ltd.

(56) June 29, 2024 Tony's Team Transport Ltd. transitioned from Manitoba to Alberta in order to amalgamate with Southland Transportation Ltd. on 07/01/2024

**Corporate Entity Chart Wholly-Owned Operating Subsidiaries
As At July 1, 2024**

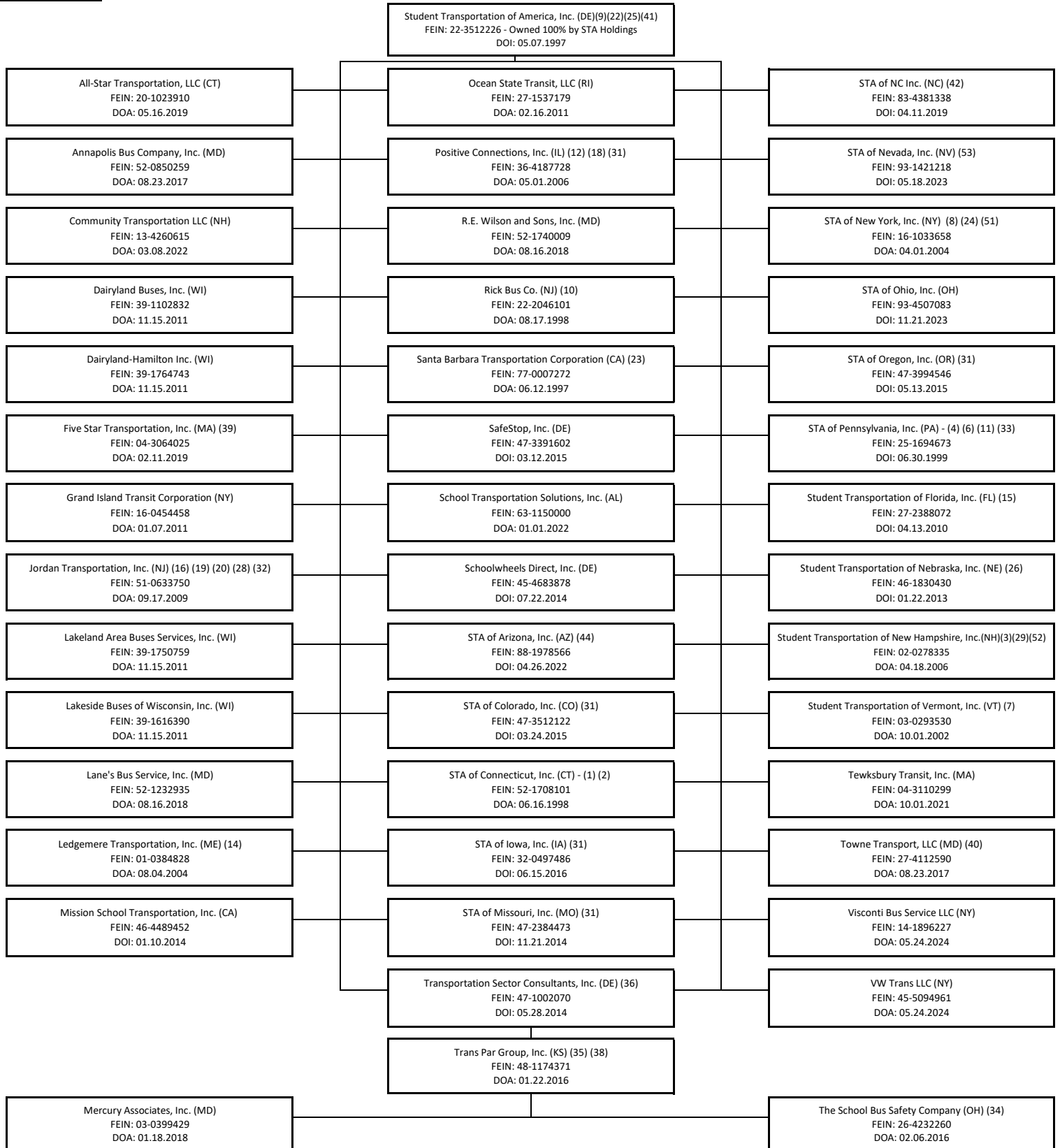


Exhibit A

Spinner US Acquireco, Inc.
Corporate Entity Chart
As At July 1, 2024

Notes:

- (1) Name change from Ledyard Transport, Inc.; Successor by merger to Griswold Transport, Inc.
- (2) d/b/a Griswold Transport in CT; d/b/a/ Ledyard Transport in CT
- (3) Successor by merger to Dail Transportation, Inc. on 12/31/2007
- (4) Name change from Holter School Enterprises, Inc.; Successor by merger to H.J. Gongaware & Sons, Inc., Davis Bus Lines, Inc., Garrett's Inc.
- (5) *Intentionally left blank*
- (6) Name change from Gongaware Tours, Inc.
- (7) Name change from Bet-Cha Transit, Inc.; d/b/a Mountain School Transit in VT; d/b/a Bet-Cha Transit in VT
- (8) Name change from Kemp's Bus Service, Inc.; d/b/a Kemp's Bus Service in NY
- (9) Successor by merger to Southwest Student Transportation LC and North Bend Bus Company, Inc., d/b/a North Bend Bus Company, d/b/a Southwest Student Transportation
- (10) Successor by merger to STA of New Jersey, Inc. (name change from Hamilton Motorcoach)
- (11) Successor by merger to James O. Sacks, Inc., STA Transportation of Pittsburgh, Inc., Ralph Prichard Schoolbuses, Inc., & Byrd Yeany Busing, Inc.
- (12) Successor by merger to Positive Connections Leasing, Corp.
- (13) Successor by merger to Student Transportation of Canada Limited, Toshmar Bus Lines Limited, & Simcoe Coach Lines Limited - d/b/a Toshmar Bus Lines & Simcoe Coach Lines
- (14) Successor by merger to Hudson Bus Lines, Inc. and McCrillis Transportation, Inc. on 12/31/2007
- (15) Incorporated 4/13/2010 in Florida. Transferred Jacksonville employees and assets effective 12/31/2010
- (16) Successor by merger to Arthur Jordan, Inc. d/b/a Arthur Jordan, Inc. in NJ
- (17) Successor by amalgamations to Fred Elliott Coach Lines Limited and Elliott Coach Lines (Fergus) Ltd. and 1767110 Ontario Inc. and Elgie Bus Lines Limited - d/b/a Elliott Coach Lines and Elgie Bus Lines, respectively
- (18) Successor by merger to Positive Connections Evanston, Inc.
- (19) Successor by merger to Wilkerson Transportation Company, Inc.
- (20) Successor by merger to Jordan Bus Service, Inc. that had a Name change from Kevah Konner, Inc.
- (21) Purchased the assets of Schumacher Bus Lines (07/13/2011), S&K Transportation Inc. (08/04/2011), Dalton Bus Lines Limited (12/05/2014)
- (22) Purchased the assets of Safe Start Transportation of New Jersey, LLC (01/01/2012), National Express Corporation of Washington & Texas (05/24/2012) & Atlantic Express Transportation Corporation (02/10/2014)
- (23) Successor by merger to A&B Bus Co. Second, d/b/a Student Transportation of America in CA. Third, for a period of time, SBT operated in Washington d/b/a Cascade Student Transportation, CST, Student Transportation of America and STA and in Idaho d/b/a Cascade Student Transportation
- (24) Successor by merger to Mid-City Transit Corp., Middletown Transit Corp., Ridge Road Express, Inc. and Scholastic Transportation Management Services, Inc., d/b/a Mid-City Transit, Middletown Transit, Ridge Road Express and Scholastic Transportation Management Services in NY
- (25) d/b/a GoldStar Transit, Inc. in Texas and d/b/a Safe Start Transportation in NJ
- (26) d/b/a Student Transportation of America in Nebraska
- (27) *Intentionally left blank*
- (28) Successor by merger first to Scholastic Bus Co. and second to School Transportation Services, LLC on 06/30/2014
- (29) Name change 06/19/2014 from Goffstown Truck Center, Inc. - d/b/a as Goffstown Truck Center in NH
- (30) Successor by amalgamation with Leuschen Bros Limited on 01/01/2015
- (31) d/b/a Student Transportation of America in state of incorporation
- (32) Successor by merger to Jordan Bus Service, Inc. on 06/30/2015
- (33) Successor by merger to Krise Bus Service, Inc., Altoona Student Transportation, Inc. & Williams Bus Lines Co. Merger dated 12/31/2015; d/b/a Krise Bus Service, Altoona Student Transportation & Williams Bus Lines in PA
- (34) d/b/a Motorcoach Safety Training Company in Ohio
- (35) Upon acquisition on 01/22/2016, Management Partnership Services, LLC, a Missouri subsidiary of Trans Par Group, Inc., was dissolved
- (36) d/b/a Transportation Services Consulting, Transportation Services Co. and TSC in DE
- (37) *Intentionally left blank*
- (38) Successor by merger to TransPar Operations, LLC (MO), TransPar Staffing Company (MO) and School Bus Consultants, LLC (MD)
- (39) d/b/a Five Star Bus in MA, d/b/a Student Transportation of America in MA
- (40) d/b/a Discover Annapolis Tours in MD
- (41) Successor by merger to Staffing Transportation, Inc. (DE) on 12/31/2019
- (42) d/b/a Schoolwheel Direct in NC
- (43) Purchased the assets of Donnelly Shuttle Transit Inc. on 10/01/2021
- (44) d/b/a Student Transportation of America in Arizona
- (45 through 50) See page 2
- (51) Successor by merger to Brown Bus Service, Inc., Brown Transportation Inc., and Little Falls-Fonda Bus Corporation on 01/01/2023; d/b/a Brown Bus Service, Brown Transportation, and Little Falls-Fonda Bus Corporation in NY
- (52) Successor by merger to Hollis Transportation, Inc. on 01/01/2023; d/b/a Hollis Transportation in NH
- (53) d/b/a Diversified Transportation Ltd. in Humboldt County, NV
- (54 through 56) See page 2

Exhibit B

Exhibit B

Entity Name	DOT #	MC#	EIN#	STATE
Legdemere Transportation Inc. 313006 - York / 313007 - Wells / 313008 - Lewistown / 313010 - KezarFalls / 313011 - Sanford Safety Rating: None	271374	Intra	01-0384828	ME
STA of Connecticut Inc. 163006 - Griswold /163008 - Ledyard /163009 - Danbury / 163010 - Groton / 163011 - Naugatuck / 163012 - Higganum / 163015 - Waterford / 163016 - Lewport/Wilton Safety Rating: None	818334	Intra	52-1708101	CT
STA of New York Inc. 443006 - Buffalo / 443007 - Williamsville / 443008 - Williamsville Big Bus /443011 - MidCity Yellow / 443013 - Lockport / 443014 - Newfane / 443015 - Gasport / 443016 - Barker / 443017 - Albion / 443020 - LewPort - Wilson Safety Rating: None	538086	Intra	16-1033658	NY
Brown Bus 443021 - Scotia / 443022 - Fonda / 443023 - Amsterdam / 443024 - Little Falls Safety Rating: None	1548553	Intra	14-1834552	NY
443018 - Grand Island Transit Corp / DBA Grand Tours Safety Rating: None	26473	Intra	16-0454458	NY
Ocean State Transit LLC 493006 - East Providence / 493007 - Middletown / 493008 - Exeter / 493009 - East Greenwich / 493010 - South Kingston / 493011 - Chariho / 493013 - Coventry / 493014 - Newport Safety Rating: None	2270207	Intra	27-1537179	RI
Jordan Transportation Inc 413007 - Paterson - Fairlawn / 413008 - Butler /413009 - PineBrook Safety Rating: None	1803455	Intra	51-0633750	NJ
Santa Barbara Transportation Corp / DBA Student Transportation of America 143006 - Santa Maria /143007-Porterville / 143008 - Tulare/Visalia / 143009-San Jose / 143010-Santa Barbara / 143011 - Lancaster / 143012-Irwindale / 143013 - Escondido / 143014 - North LA Co / 143015 - San Bernadino / 143016 - Riverside / 143017 - Morongo / 143018 - North Hollywood / 143021 - Contra Costa Safety Rating: None	677713	Intra	77-0007272	CA
STA of Pennsylvania, Inc 483008 - Coraopolis /483009 - Girard /483011 - Harborcreek /483012 - Hermitage / 483013 - Prospect /483014 - Pine-Richland /483015 - Bangor / 483016 - Emporium /483018 - WilkesBarre / 483019 - Williamsport / 483020 - East Penn /483021 - Altoona / 483022 - Apollo Ridge / 483023 - Gateway / 483024 - Indiana / 483026 - Yough / 483029 - Bristol / 483030 - Neshaminy / 483031 - Collegeville / 483032 - Hempfield / 483033 - Springfield / 483034 - Albert Gallatin / 483035 - Carmichaels /483036 - Elizabeth Forward	818076	Intra	25-1694673	PA

Exhibit B

Safety Rating: None				
Positive Connections Inc / DBA Student Transportation of America 243006-Markham, IL / 243007-Evanston, IL	714335	Intra	36-4187728	IL
Safety Rating: None				
Student Transportation of America DBA Goldstar Transit Inc	2356208	Intra	22-3512226	TX
533006 - Boyd /533007 - Bastrop / 533008 - Terrell / 533009 - Eagle Mountain / 533010 - Little Elm / 533011 - Lago Vista / 533012 - Burleson /533013 - Waco / 533014 - Fort Bend / 533015 - Navasota / 533016 - White Settlement / 533017 - Kennedale / 533018 - Lockhart / 533019 - Round Rock / 533020 - Katy				
Safety Rating: None				
Student Transportation of Nebraska, Inc 393006 - Omaha / 393007 - Millard	2390177	Intra	46-1830430	NE
Safety Rating: Satisfactory				
583009 - Lakeland Area Bus Service Inc Woodruff, WI	840155	Intra	39-1750759	WI
Safety Rating: None				
Dairyland Buses Inc / DBI 583011 - Muskego	243241	Intra	39-1102832	WI
Safety Rating: None				
583010 - Dairyland -Hamilton Inc	1808358	Intra	39-1764743	WI
Safety Rating: None				
583007 - Lakeside Buses of Wisconsin Inc	709283	Intra	39-1616390	WI
Safety Rating: None				
Student Transportation of America, Inc. 413006 - Williamstown	817987	MC-31422	22-3512226	NJ
Safety Rating: Satisfactory				
Rick Bus Company, Inc	818039	Intra	22-2046101	NJ

Exhibit B

413010 - Trenton / 413011 - Willingboro				
Safety Rating: None - Type Compliance Review - Review Date: 10/25/1996				
STA of Missouri, Inc / DBA Student Transportation of America	2572712	Intra	46-4489452	MO
343006 - Columbia / 343007 - Center SD (Kansas City) / 343008 - SSD St Louis / 343009 - Kansas City				
Safety Rating: None				
Santa Barbara Transortation Corp / DBA Cascade Student Transportation	2802317	Intra	47-4413008	ID
233006 - Meridian, ID				
Safety Rating: None				
STA of Colorado, Inc / DBA Student Transportation of America	2611625	Intra	47-3512122	CO
153006 - Grand Junction / 153007 - Pueblo / 153008 - Montrose				
Safety Rating: None				
Mission School Transportation	2721165	Intra	46-4489452	CA
143019 - LongBeach / 143020 - Los Angeles (Sotello St) / 143022 - Pasadena				
Safety Rating: None				
Student Transportation of Florida, Inc	2486832	Intra	27-2388072	FL
193006 - Jacksonville / 193007 - Jacksonville West / 193012 - Jacksonville North / 193010 - Pace / 193009 - Milton / 193011 - NavarreGulfbreeze / 193008 - Santa Rosa				
Safety Rating: None				
STA of Oregon, Inc / DBA Student Transportation of America	2723698	Intra	47-3994546	OR
473006 - LakeOswego / 473007 - Tigard / 473009 - Sandy / 473008 - Canby / 473010 - Corvallis / 473011 - Portland / 473012 - Newburg				
Safety Rating: None				
STA of Iowa Inc	2901999	Intra	32-0497486	IA
223006 - Johnston				
Safety Rating: None				
303006 - Annapolis Bus Company Inc (MD)	122651	Intra	52-0850259	MD
Safety Rating: None				
303008 - R.E. Wilson & Sons Inc (MD)	804776	Intra	52-1740009	MD
Safety Rating: None				
303009 - Lanes Bus Service Inc (MD)	2057332	Intra	52-12322935	MD
Safety Rating: None				
All-Star Transportation LLC (CT)	1264543	Intra	20-1023910	CT
163506 - Brookfield / 163507 - Burlington / 163508 - Lakeville / 163509 - Litchfield / 163510 - Monroe / 163511 - New Milford / 163512 - Newtown / 163513 - Oxford / 163514 - Plymouth / 163515 - Prospect / 163516 - Seymour / 163517 - Thomaston / 163518 - Torrington / 163519 - Washington / 163520 - Waterbury / 163521 - Winchester / 163522 - Wolcott / 163523 - Woodbury				
Safety Rating: Satisfactory				
Five Star Transportation Inc / DBA Five Star Bus	832621	Intra	43-064025	MA
293006 - Barnstable / 293007 - Dennis-Yarmouth / 293008 - Chicopee / 293009 - Hadley / 293011 - Middleborough				
Safety Rating: Satisfactory				

Exhibit B

293010 - Tewksbury Transit Inc Safety Rating: Satisfactory	564155	MC-277335	04-3110299	MA
403018 - Hollis Transportation Inc (NH) Safety Rating: None	1740639	Intra	20-407388	NH
Student Transportation of Vermont/ DBA- Bet-Cha Transit 563006 - Middlebury / 563006 - Fair Haven / 563006 - Rutland / 563007 - Milton / 563008 - Williamstown / 563009 - White River Junction Safety Rating: Satisfactory	378911	Intra	03-0293530	VT
Student Transportation of New Hampshire Inc / DBA Goffstown Truck Center Inc 403007 - Goffstown / 403009 - Bedford / 403006 - Epsom / 403015 - Hookset / 403011 - Kearsarge / 403014 - Londonderry / 403016 - Peterborough / 403010 - Rochester / 403017 - Portsmouth / 403088 - Weare / 403013 - WindhamPelham / 403012 - Merrimack Safety Rating: Satisfactory	7286	Intra	02-0278335	NH
Community Transportation LLC 403019 - Jaffrey, NH Safety Rating: None	1929815	MC-695195	13-4260616	NH
School Transportation Solutions / DBA STS Contract Transportation 113006 - Birmingham, AL Safety Rating: None	651516	Intra	63-1150000	AL
Visconti Bus Service, LLC 443025 - Visconti NY Safety Rating: None	1270332	Intra	14-1896227	NY

Entity Name (CANADIAN)	DOT #	MC#	EIN#	STATE
Prince George Transit Ltd Safety Rating: Satisfactory	3318161	MC-1067030		
Prairie Bus Lines Ltd. Safety Rating: Satisfactory	2892710	MC-971796		
Standard Bus Contracting Ltd. Safety Rating: Satisfactory	2260697	MC-775507		