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September 3, 2024
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## BEFORE THE SURFACE TRANSPORTATION BOARD

### **STB DOCKET NO. MCF-21117**

BUS COMPANY HOLDINGS TOPCO LP AND BUS COMPANY HOLDINGS US LLC ACQUISTION OF CONTROL OF ASSETS – CHENANGO VALLEY BUS LINES, INC.; COMMUNITY BUS LINES, INC.; DILLON'S BUS SERVICE, INC.; ELKO, INC.; HUDSON TRANSIT LINES, INC.; OLYMPIA TRAILS BUS COMPANY, INC.; ROCKLAND COACHES, INC.; SAM VAN GALDER INC.; SUBURBAN TRANSIT CORP.; TRENTWAY-WAGAR, INC.; AND WISCONSIN COACH LINES, INC.

# THE RENCO GROUP, INC.'S FILING TO JOIN APPLICATION OF BUS COMPANY HOLDINGS TOPCO LP, ET AL. FOR CONTROL OF MOTOR PASSENGER CARRIERS

Pursuant to 49 U.S.C. § 14303(a)(5), and the Board's rules at 49 CFR Part 1182, The Renco Group, Inc. ("Renco") submits this filing in accordance with the Surface Transportation Board's ("Board") *Notice Tentatively Approving and Authorizing Finance Transaction* relating to Renco subsidiaries. 89 Fed. Reg. 68,233 (Aug. 23, 2024) ("Notice"). In that Notice, the Board advised that "Renco will be required [by September 6, 2024] to submit a filing joining the application and including any additional information required of an applicant under the Board's rules." 89 Fed. Reg. at 68,236. The Notice further provides that "Renco's filing may incorporate the existing application by reference to the extent appropriate, supplementing as necessary with any information specific to Renco required under 49 CFR 1182.2." *Id*.

In accordance with the Notice, Renco hereby joins and incorporates by reference the application filed on June 21, 2024 ("June 21 Application") by Bus Company Topco LP ("Topco") and Bus Company Holdings US LLC ("Holdings US") (collectively, "Bus Company Holdings"), along with certain of their subsidiaries (collectively, "Applicants"). Information specific to Renco,

as required under 49 CFR 1181.2, is set forth below:

- 1. Renco's full name is The Renco Group, Inc., and its address is One Rockefeller Plaza, 29th Floor, New York, NY, 10020. An authorized signature for Renco is included as Attachment 1 to this filing.
- 2. Copies of the federal and state operating authorities subject to the transaction are included as Exhibit 1 to the June 21 Application, and incorporated herein by reference.
- 3. A description of the transaction, which is incorporated herein by reference, is included in Section I of the June 21 Application. The transaction is also accurately described in the Board's Notice.
- 4. No motor passenger carriers are affiliated with Renco other than the Applicants described in the June 21 Application.
- 5. The jurisdictional statement set forth in Section III of the June 21 Application is incorporated herein by reference.
- 6. The statement at Section X of the June 21 Application is incorporated herein by reference, which states that the transaction will not significantly affect the quality of the human environment and the conservation of energy resources.
- 7. Section V of the June 21 Application is incorporated herein by reference, which provides information to demonstrate that the proposed transaction is consistent with the public interest.
- 8. Renco certifies to the safety fitness certification at Section VII of the June 21 Application, which is incorporated herein by reference.
- 9. Renco certifies that, prior to commencement of operations, it and Applicants will have in place the requisite insurance coverage under 49 U.S.C. § 13906.

10. Renco certifies that it is <u>not</u> domiciled in Mexico or owned or controlled by persons

of that country.

11. The transaction does <u>not</u> involve the transfer of operating authority to an individual

who will hold the authority in his or her name.

The above statements are verified, as per 49 CFR 1182.8(e), by Attachment 1 to this filing.

**CONCLUSION** 

In accordance with the Board's Notice, Renco's filing to join the June 21 Application has

been timely submitted by September 6, 2024 and includes all information required by 49 CFR

1182.2. To allow the Notice to become effective on October 8, 2024, Renco urges the Board to

find this filing satisfactory, or expeditiously request any additional information from Renco that

may be needed for the Board to deem this filing satisfactory,

Respectfully submitted,

Joshua H. Runyan

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1330 Connecticut Avenue, NW

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(202) 429-3000

Attorney for The Renco Group, Inc.

September 3, 2024

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### **ATTACHMENT 1**

#### **VERIFICATION**

I, Joshua R. Weiss, Vice President, Chief Legal Officer & Secretary of The Renco Group, Inc., verify under penalty of perjury, under the laws of the United States of America, that all information supplied in connection with this Application relative to The Renco Group, Inc. is true and correct. Further, I certify that I am qualified and authorized to file this application or pleading. I know that willful misstatements or omissions of material facts constitute Federal criminal violations punishable under 18 U.S.C. § 1001 by imprisonment up to five years and fines up to \$10,000 for each offense. Additionally, these misstatements are punishable as perjury under 18 U.S.C. § 1621, which provides for fines up to \$2,000 or imprisonment up to five years for each offense.

Joshua R. Weiss

Vice President, Chief Legal Officer & Secretary

Dated: September 3, 2024

#### **CERTIFICATE OF SERVICE**

I certify that I have this 3rd day of September, 2024 served a copy of the foregoing The Renco Group, Inc.'s Filing to Join Application of Bus Company Holdings Topco LP, et al. for Control of Motor Passenger Carriers by overnight delivery on:

Director of Operations Antitrust Division U.S. Department of Justice 950 Pennsylvania Ave. N.W. Room 3335 Washington, D.C. 20530 Premerger Notification Office Bureau of Competition United State Federal Trade Commission 600 Pennsylvania Avenue, NW Room 303 Washington, DC 20580

and by first class mail, postage prepaid on:

Chief, Registration, Licensing & Insurance Division
United States Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Chief, Registration, Licensing & Insurance Division
Office of Registration & Safety Information
Federal Motor Carrier Safety Administration
1200 New Jersey Ave. SE
Mail Stop W65-331
Washington, DC 20590

Maryland Public Service Commission Transportation Division William Donald Schaefer Tower 6 St. Paul St. Baltimore, MD 21202 New Jersey Motor Vehicle Commission Passenger Carrier Service Request P.O. Box 680 225 East State Street Trenton, NJ 08666-0170

New York State Department of Transportation Office of Modal Safety and Security 50 Wolf Road, POD 53 Albany, NY 12232

Nevada Transportation Authority 3300 W. Sahara Ave, Suite 200 Las Vegas, NV 89102

Wisconsin Department of Transportation 4822 Madison Yards Way Madison, WI 53705

Wyoming Department of Transportation MVS – Regulatory Section 5300 Bishop Blvd.
Cheyenne, WY 82009-3340

Joshua H. Runyan