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US DOT # 2265836 (ICC/MC #773523)
Pennsylvania Public Utility Commission # A-6415272

VIA ELECTRONIC MAIL

The Honorable Joel Szabat
Assistant Secretary of Aviation and International Affairs
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: **Docket DOT-OST-2020-0037** (Continuation of Certain Air Service Under CARES Act)
OBJECTION TO SHOW CAUSE ORDER AND COMMENTS

Dear Honorable Joel Szabat & Secretary Chao:

LX Transportation LLC believes the Secretary and Department have ignored the viability and efficiency of motorcoach ground transportation in its rulemaking, in requiring that service to all cities be maintained by air, regardless of their distance and close proximity to hub airports.

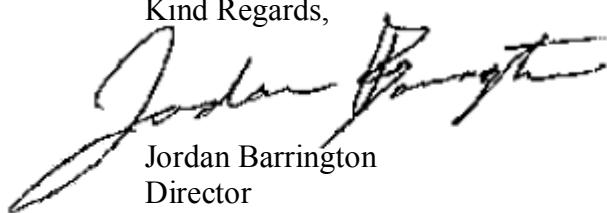
We ask the Department to consider certain ground transportation substitutions performed by large 56-seat motorcoaches, as equivalent to air service for the purpose of the CARES Act, on routes of less than 200 air-miles, when the motorcoaches are chartered by an airline on a flat-rate basis, marketed and sold by an airline as a flight, provided that the motorcoaches seat at least 55-passengers.

- Save substantial cost for airlines when they need cost savings the most.
 - A 50-passenger motorcoach can bus used for PHL-EWR for an operating cost as low as \$375 one-way, considering 4 round-trips per day with a single bus
 - Comparable cost for a 50-passenger aircraft is approximately \$2,350 per one-way flight, which is **6-times higher**
- Motorcoaches have significantly higher on-time rates than aircraft in the current environment with road-traffic currently eliminated for the foreseeable future. The only potential delays relate to mechanical breakdowns or driver illness. Motorcoaches face mechanical delays on less than 1% of trips, but this number is substantially higher for aircraft
- Faster travel times between some points (e.g. PHL-ABE, PHL-EWR, EWR-ALB), with the current elimination of road traffic.
 - Motorcoaches can depart their origin airport at the airline check-in cutoff (30-minutes prior to scheduled flight departure). Combined with the elimination of road traffic, motorcoaches can therefore often get passengers to their destination **faster than by air**

- DOT seeks to maintain essential cargo capacity, but impacted flights currently carry no cargo, or little cargo. Cargo feeder capacity not essential, nor is it even efficient (nor widely utilized, to airports within 200-miles of a major hub, as the delay for cargo transferred to the hub by truck, is not substantial)
 - In fact truck over 200-mile routes almost always faster than placing the cargo on a feeder passenger flight, after considering passenger carriers' very high cargo handling times, which can exceed 2 hours on both ends. This means that almost all air-cargo from the areas served by smaller airports within 200-miles of a hub, is already trucked directly to the hub, resulting in these flights carrying virtually no cargo
 - While all-cargo “express” carriers such as Federal Express may see lower transit times by air-feeder over short routes, that is only because they have much lower cargo handling times than passenger airlines
 - Motorcoaches carry more cargo than the aircraft they replace
- Reduced passenger interactions with airport and airline employees, and reduced passenger contact with the terminal buildings.
- More social distancing space on motorcoaches, as they are larger than the aircraft they would be replacing
- Substantially reduced fuel consumption and carbon footprint of motorcoaches verses aircraft
- Will provide a form of stimulus for the decimated motorcoach industry, which unlike airlines and hotels, has seen a 100% business shutdown during its busiest season.
 - The motorcoach industry, unlike the airlines, has also not been granted any bailout, and will likely not receive a bailout.
 - It is estimated that 42% of motorcoach operators will not survive if the current economic stimulus is not expanded with specific relief to the motorcoach industry. Allowing ground-travel on short airline routes could allow survival for many bus operators.

To that end, we hope to the Department will consider allowing air carriers to substitute air travel performed by 30 to 50-passenger aircraft, with larger 56-passenger motorcoach buses, on short routes where it is more logical and cost-effective. And in doing so, provide better service to communities, lower costs for airlines, and badly needed revenue for the decimated motorcoach industry.

Kind Regards,



Jordan Barrington
Director