



MOTOR COACH CANADA
L'ASSOCIATION DES AUTOCARISTES CANADIENS

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July 28, 2010

Avelino A. Gutierrez
Chairman of the Board
Unified Carrier Registration Agreement
PO Box 1269
Santa Fe, NM
87504

UCR Board Minutes 10-14-2010
Exhibit D

Dear Mr. Gutierrez,

Motor Coach Canada is a national association representing Canada's bus companies. Our members operate scheduled inter-city bus routes as well as charter, tour and contract services. We have 125 bus operator members located across Canada who operate 2,500 motor coaches.

We are writing to express our concerns about the Unified Carrier Registration Agreement as it applies to Canadian bus companies. It is our understanding that Canadian carriers are required to pay UCR fees per the published fee schedule. The fee brackets are based on fleet size as reported on the carrier's most recent MCS-150 filing with US DOT. While we can understand this makes sense for carriers based in the United States where the entire fleet is operated, we don't feel it's fair to Canadian carriers many of whom have relatively low US mileage as compared to miles travelled within Canada. Many of our members have to pay several thousands of dollars in UCR fees, yet the vast majority of mileage is in Canada. We believe Canadian carriers should pay UCR fees based on the extent to which they operate in the US. Such an approach would be comparable to IRP and IFTA where fees are pro-rated based on actual mileage. This would be more fair and reasonable for Canadian carriers.

A second concern we have is the recent fee increase for 2010 which essentially doubles the previous fee scale. This substantial increase creates a hardship for our members at a time when business is down and it has elevated our members' dissatisfaction over having to pay the same UCR fees as American carriers regardless of their actual US mileage.

We ask that the Unified Carrier Registration Board of Directors consider these concerns and investigate the feasibility of a pro-rate fee structure for Canadian carriers that align fees with US travel.

Yours truly,


Brian Crow
President



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