The Honorable John Brennan III

Chief Counsel

Federal Transit Administration

1200 New Jersey Avenue, SE

Washington, DC 20590-0001

FTA Docket: FTA-2016-0025

Dear Mr. Brennan,

On behalf of \_\_\_\_\_\_\_\_, I would like to urge the Federal Transit Administration to extend the Buy America waiver for minivans until such time that a suitable vehicle can be found.

In October 2016, the Federal Transit Administration (FTA) granted a public interest waiver of the Buy America domestic content requirement for Non-ADA Accessible minivans and vans. (Docket No. FTA-2016-0025). The FTA was unable to identify any minivan manufacturers who met both the final assembly and domestic content requirements for non-ADA accessible minivans (hereafter referred to as “minivans”). Accordingly, the FTA:

* Waived its Buy America domestic content requirements for minivans, and
* Retained its requirement for final assembly in the United States.

This waiver, issued in May 2016, applies to all contracts for the procurement (public or privately contracted) of minivans and vans entered on or before September 30, 2019 or until a fully compliant domestic source becomes available, whichever is earlier.

With less than three months before the expiration of the current waiver, we urge the FTA to take action to extend such waiver given that no new vehicles have come to market that meet Buy America requirements.

Seven-passenger Multipurpose Passenger Vehicles (MPVs per the National Highway Traffic Safety Administration) used in the provision of public transportation by vanpool have become increasingly popular (minivans and SUVs). Seven-passenger MPVs have unique advantages compared to full-size, eight to fifteen passenger vans:

* Easier to start new vanpool groups and retain existing vanpool groups
* Attract long-distance commuters from low-density, rural/exurban areas to employment centers
* 4WD/AWD capability helpful in snow, hilly areas and steep driveways

Failure to extend the current waiver will create confusion and uncertainty in the industry and will have an impact on the ability of programs to grow.

Given these points, we strongly urge FTA to extend the waiver outlined in FTA-2016-0025 until such time that a suitable vehicle is found.