

June 19, 2000

Mr. Jere W. Glover
Chief Counsel for Advocacy
Small Business Administration
409 Third Street, SW
Washington, DC 20416

Dear Mr. ^{G.F.F.F.E.}Glover,

On behalf of the members of the United Motorcoach Association (UMA), I wish to once again express our thanks for the work conducted by the SBA's Office of Advocacy in support of the Nation's motorcoach industry. As you are aware, UMA is the Nation's largest association of professional motorcoach owners and operators. We represent over 900 of the Nation's largest and smallest private commercial passenger carriers as well as some 150 motor coach manufacturers, component and service suppliers. UMA operator members provide tour and charter, regular route, commuter, airport shuttle, and school transportation services in both interstate and intrastate commerce.

It has been estimated that over 95 percent of the Nation's motorcoach companies meet the SBA definition of a small business. Over the past several years UMA has come to rely on the Office of Advocacy as its first line of defense against executive branch agencies that do not adequately consider the effect of significant rulemakings on industries such as ours. Once again you and your staff have come through for us. We recognize that during the recent DOT hours-of-service rulemaking, the Office of Advocacy played the leading role in persuading the agency to reverse their negative small business effect certification. By this action the entire nature of the rulemaking was changed to the benefit of small coach operators.

It goes without saying that in matters concerning the EPA and OSHA the Office of Advocacy has also been highly effective. Your office recently provided the UMA with an opportunity to voice our concerns regarding the recent EPA diesel engine emission reduction standards and OSHA's ergonomic and health and safety rulemakings at your regularly scheduled roundtable sessions. Because key congressional and agency staff personnel also attend we are able to inform the individuals that most need to know our concerns. This occurred before we got into the formal commenting process.

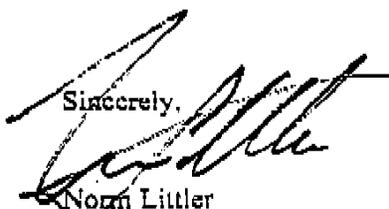


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Our industry will never forget the assistance we received in 1998 when the Department of Transportation proposed ADA rules that would have set quotas for the installation of wheelchair lifts in the charter and tour coach segment of the industry. Your department's assistance in convincing Secretary Slater to allow a service based option, instead of the quota based approach that was first proposed, saved an estimated \$200 + million. This was money that thousands of small, marginally profitable coach operators would have otherwise had to pay. Many would have gone under trying.

In closing, I have attached a copy of the text that accompanied UMA's Appreciation Award that you accepted on behalf of yourself and your outstanding staff at our 1999 Motorcoach EXPO in Houston. Gere, UMA values what the Office of Advocacy does for us. I know for a fact that this is an opinion held by all of the other small business representatives that I come into contact with.

Sincerely,

A handwritten signature in black ink, appearing to read "Norm Littler", written over a horizontal line.

Norm Littler

Vice President of Government Affairs

**Presentation of a Plaque of Appreciation to the Jere Glover and the Staff of the SBA
Office of Advocacy by Calvin Cooper, UMA President at the 1999 UMA
Motorcoach EXPO in Houston, Texas**

In March of 1998 the Department of Transportation published its long anticipated proposed rule for motorcoach accessibility for persons with disabilities. The goal of achieving accessibility for all people in all forms of transportation laudable and one that the motorcoach industry fully endorses. DOT's proposed rule however would have gone far beyond what would have been necessary to serve the Nation's disabled traveler.

It was at this point that the United Motorcoach Association turned to the U.S. Small Business Administration's Office of Advocacy for help. The Office of Advocacy acts as the watchdog agency for small business interest over regulatory actions by other federal agencies. Federal law requires regulators to consider the effect of their rules on small businesses and develop rules that have the least cost and burden attached.

In April, the Office of Advocacy convened a meeting between DOT and a group of small motorcoach company owners to examine the expected effect of the ADA rule on their operations. During the meeting it was suggested that the least costly means of providing full accessibility would be by adopting a service-based rule. Both the SBA and DOT were assured that the needs of disabled passengers could effectively be provided in this fashion. Industry representatives convinced the Office of Advocacy of the merits of the service-based approach to such an extent that the agency filed with DOT on behalf of the industry's position.

UMA believes that the Office of Advocacy's comments were directly responsible for DOT's introduction of a service-based approach to accessibility for the majority of coach operators. Their advocacy on behalf of small company owners may reduce the overall cost of the ADA rule to the industry by as much as \$200 million.

Because of this UMA has had a plaque prepared. The dedication reads . . . "This award is presented to the Small Business Administration, Office of Advocacy, in grateful appreciation for its courageous and effective representation of the best interests and business practices of the members of the United Motorcoach Association during 1998."

At this time I will ask Mr. Jere Glover to join me. Mr. Glover is chief council for advocacy at the Small Business Administration.

- He was nominated to this position by President Clinton and was confirmed by the Senate in 1994.
- He is attorney specializing in small business issues and prior to joining SBA was a trade association executive and CEO of several successful businesses.

- From 1978 to 1981, Mr. Glover served as the SBA's deputy chief for advocacy and played an active role in the White House Conference on Small Business.
- In 1978, he served as subcommittee counsel to the House Small Business Committee.
- From 1975 to 1977, he served as director of the legal division of the Consumer Product Safety commission and was also an anti-trust attorney with the Federal Trade Commission.
- Mr. Glover holds a bachelor's degree and a law degree from Memphis State University. He also holds an advanced law degree in administrative law and economics from George Washington University.

And now Jere, it gives me great pleasure to ask you to accept, on behalf of the all the members of the Office of Advocacy, this award of appreciation from the members of the United Motorcoach Association.