

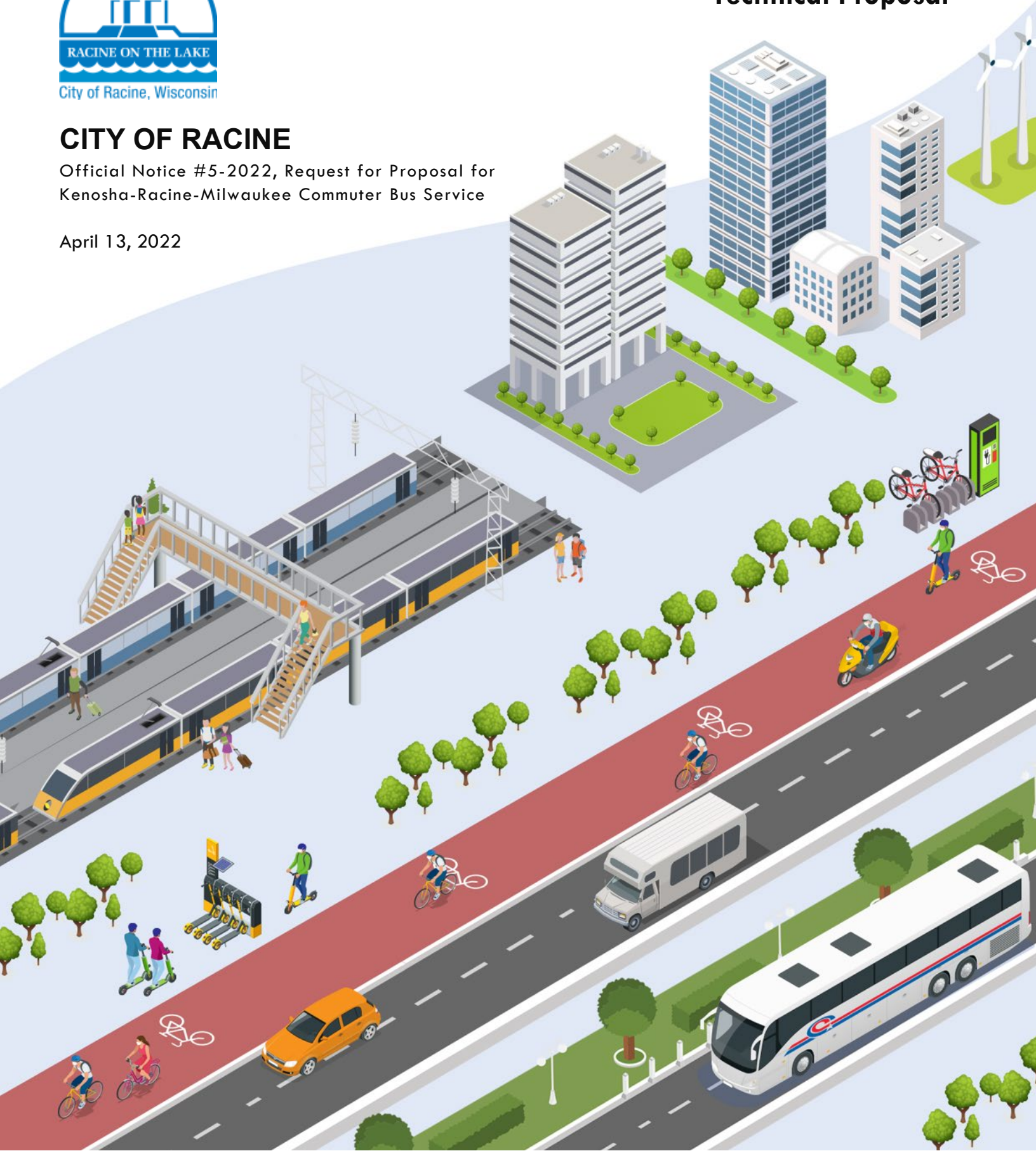


Technical Proposal

CITY OF RACINE

Official Notice #5-2022, Request for Proposal for
Kenosha-Racine-Milwaukee Commuter Bus Service

April 13, 2022





COVER LETTER

Headquarters	Subsidiary
160 S. Route 17 Paramus, NJ 07562 P: (201) 529-3666 www.coachusa.com	Wisconsin Coach Lines 1520 Arcadian Ave. Waukesha, WI 53186 P: (262) 542-8861 coachusa.com/wisconsincoach

April 13, 2022

Crystal Moore, Asst. Finance Director
City of Racine Purchasing
730 Washington Ave., Room 105
Racine, WI 53403

Re: Request for Proposal for Kenosha-Racine-Milwaukee (KRM) Community Bus Service, Official Notice #5-2022

Dear Ms. Moore:

On behalf of our wholly-owned subsidiary company, Wisconsin Coach Lines, (“WCL”), Coach USA is pleased to submit the attached response to the City of Racine Purchasing Department (“the City”) **Request for Proposal for KRM Commuter Bus Service, Official Notice #5-2022.**



As the contractor for the City’s KRM Commuter Bus Service since 1964, Wisconsin Coach Lines has an unparalleled understanding and knowledge of the City’s transportation needs, and a vested interest in the surrounding community.

Coach USA Company Overview

Coach USA is one of the leading providers of ground passenger transportation and mobility solutions in North America, with operations in 27 locations throughout the United States and Canada and a fleet of over 2,250 vehicles. Coach USA is one of the leading providers of ground passenger transportation and motor coach operator in the country.

Coach USA’s history has been one of growth, innovation, and quality of service. During the current challenging times, Coach USA is proud of our heritage and experience, but also the strength and resilience of our employees who are committed to providing safe and reliable passenger transportation services, even during the most difficult times. Coach USA has proven its ability to dynamically adjust our services and practices to address ongoing public health concerns while continuing to seek new and innovative ways to serve our passengers and clients.

WCL is proud of our more than 80 years of operation in Wisconsin and success partnering with the various stakeholders in the communities we serve to promote wider economic growth through job creation and improved access to safe, affordable, and sustainable transportation. We believe this experience has allowed us to fully understand the scope of work detailed in the RFP and makes us well qualified to deliver on the related services over the term of the contract(s).

WCL is proud of our more than 80 years of operation in Wisconsin and success partnering with the various stakeholders in the communities we serve to promote wider economic growth through job creation and improved access to safe, affordable, and sustainable transportation. We believe this experience has allowed us to fully understand the scope of work detailed in the RFP and makes us well qualified to deliver on the related services over the term of the contract(s).

In addition to our long history serving our local communities in Wisconsin, one of the things that sets us apart is the financial stability, diversification of services, and strategic value that comes from being a part of a national brand.

Looking Forward

Coach USA certifies that we will comply, including all our personnel, with all local, state, and federal regulations. **Our proposal is valid for 121 days from the submittal date, April 13, 2022.**

Our continued focus, during good and challenging times, is in the spirit of partnership with our clients. We understand that in this ever-changing business climate, flexibility, and the ability to quickly and efficiently address new concerns is one of the defining characteristics of a successful partner. Over the last few years of the contract with the City, especially the unprecedented operating environment necessitated by COVID-19, Coach USA has proven its ability to make hard decisions and to innovate in a way that is most beneficial not only to you, our client, but also to the communities we serve.

In the response that follows, we have provided the requested information for the discussed services. Please feel free to contact me at (262) 542-8861, Ext. 140 or at tom.dieckelman@coachusa.com if you have questions or require any additional information.

Sincerely,



Tom Dieckelman
Vice President and General Manager
Wisconsin Coach Lines | A Coach USA Company

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EXECUTIVE SUMMARY

Coach USA, on behalf of our subsidiary company Wisconsin Coach Lines (“WCL”), is pleased to submit our proposal for Kenosha-Racine-Milwaukee (“KRM”) Commuter Bus Service for the City of Racine (“the City”).



Our relationship with the City began almost 60 years ago. In 1964, WCL began operating inter-city commuter service between Milwaukee and Racine. Our partnership has evolved over the years, as this service developed into the present-day inter-city commuter service that operates now between Racine, Kenosha and Milwaukee. WCL has evolved with the City, adapting to technology and safety innovations, as well as the ever-evolving needs of the City and its residents and passengers. We are offering additional technology innovations to the City in our Proposal and we are excited to discuss these options with you. However, one facet of that partnership that has never wavered is our commitment to serving the City and the Kenosha, Racine, and Milwaukee communities.

In the following proposal, we have provided details on the history of WCL’s service to the City and our plans for the future. We have outlined the highlights of our partnership in this Executive Summary. If selected as your partner, WCL will be proud to continue to support the City and the KRM Commuter Service passengers in a new contract.

Company Summary

As one of the largest U.S. based and privately-owned ground passenger transportation companies in North America, Coach USA’s history has been one of growth, innovation, and quality of service. As we slowly recover from the challenges of operating during a global pandemic, Coach USA is proud not only of our heritage and experience, but of the strength and resilience of our employees who are committed to providing safe and reliable passenger transportation services. Coach USA has proven its ability to dynamically adjust our services and practices to address ongoing public health concerns while continuing to seek new and innovative ways to serve our passengers and clients.

Our efforts in the execution of this contract will be focused on providing the highest quality of service that keeps our shared passengers, and their health and safety, at the heart of everything we do. We will accomplish this through our partnership with the City to create an atmosphere of engagement that provides everyone, whether a passenger, employee, or the public, the information they need and timely execution of the latest public safety guidelines on the contract services. **We are willing to adjust the schedule and revenue hours of this route to meet changing shift times of the riding public while working within the constraints of revenues and the state operating assistance percentage.**

Company Philosophy

The underlying success of our company is based upon the way we approach the individuals who utilize our service. Our business is not just to provide bus service; it is to provide safe, reliable, comfortable and affordable transportation service. The individuals who utilize our service are more than just riders - they are our valued customers.

Coach USA: A Proven Local Provider

Wisconsin Coach Lines began operating intra-urban service in 1941 under the name “Waukesha Transit Lines.” In 1963, Waukesha Transit Lines obtained the operating rights for several inter-urban bus routes in the southeast Wisconsin area from Greyhound Lines and changed its name to Wisconsin Coach Lines.

WCL was acquired by Coach USA in 1998 and continues to develop new and innovative types of mass transit service (reverse commuter service, flexible employee shuttles, summer festival service, etc.) and has marketed these services with billboard advertising, digital, television, and radio advertising, newspaper advertising, social media, shrink-wrapped buses, and marketing grants.

In 2021, WCL proudly celebrated 80 years in business as a locally based company serving the southeastern Wisconsin community. We continue to be committed to providing outstanding quality service. In a renewed contract with Coach USA, the City will benefit from the expansive network and expertise of a national brand, along with the personalized service and community investment of your local incumbent supplier.



In 2021, WCL proudly celebrated 80 years in business as a locally based company serving the southeastern Wisconsin community. We continue to be committed to providing outstanding quality service. In a renewed contract with Coach USA, the City will benefit from the expansive network and expertise of a national brand, along with the personalized service and community investment of your local incumbent supplier.

Partnership Highlights

Wisconsin Coach Lines has served the City of Racine since 1964. We are proud of our service to the City and have included some of our current contract successes below:

More than **one million** miles traveled since 2017

Nearly **210,000** passengers served since 2017

Rated the **highest possible safety score** by the FMSCA in 2022

Over the last six decades, Coach USA has worked towards cultivating a mutually beneficial relationship with the City. We are eager to continue to work alongside your staff as you move towards achieving your transportation goals. We will continue to keep open lines of communication to ensure that your needs are being met. Our dedicated local management team will provide the support needed through transparent communication and innovative thinking.

Experienced, Dedicated Local Management Team

None of our proposed policies and procedures for the City matter without the best team to execute them. Our management team, operating staff and drivers have a wealth of experience in transportation. As the included organizational chart and detailed management team descriptions indicate, we are not only well organized, but also very professional and experienced with over 125 years of combined direct experience on this service – no team is better suited or more committed to managing the transportation service for the City.

These individuals will continue to oversee the execution of this project with a desire to treat employees with respect, kindness, and provide them the training and support needed to complete their jobs with excellence. Each member of our team is vitally important to the success of the City, cultivating strong relationships to those with whom we interact daily. **We are not just your contractor; we are your partner.**

As a part of Coach USA, WCL benefits from our region support team. The Coach USA corporate staff regularly visits our locations to provide analysis as well as mentoring to our local managers. Senior Vice President Mike Pjevach, a City of Pewaukee resident, will be on-site regularly to review service delivery performance with the team. He will use these visits to review system performance and will address any of the City's concerns regarding the service.

Please see the **Resumes** section of this Technical Proposal for bios and resumes for the senior management dedicated to the City's commuter transportation services.

The City also benefits from the expertise and support of the Coach USA corporate maintenance and safety teams. We monitor and gather data from each of our locations, including PM compliance, repair quality, and safety measures to identify areas of potential continuous improvement of individual operating companies. The Vice President of Maintenance holds weekly meetings with our company-wide maintenance staff to review PM compliance data and correct any deficiencies and/ or trends. In addition, our Vice President of Safety sends daily safety messages across the organization.

Industry-Leading Policies and Programs

Using our experience, Coach USA has created and implemented programs to ensure that everything we do follows industry best practices and manufacturer recommendations, while maintaining a strong focus on safety. These programs include vehicle maintenance, safety, training, technology, and marketing.

Proposed Fleet

Our large fleet allows us to maintain higher than normal spare ratios. We believe that deluxe inter-city motor coaches with restrooms and capacity for 55 and 56 passengers are the proper vehicles for these routes. These larger vehicles are necessary not only due to peak time ridership, but also for future ridership growth. The fleet is available for inspection by the committee.

Coach USA's Proposal for the City of Racine

Coach USA has prepared a thorough proposal that is responsive to the City's RFP for Commuter Bus Service. Our proposal is structured and organized to help in the review process. We are available to meet in person to answer any questions you may have. In addition, the evaluation committee is welcome to visit our facility at their convenience.

Cost-Effective Pricing

We are pleased to submit a cost effective, economical proposal to fit into your budget needs even in today's challenging business environment. Per the RFP instructions, we have separately attached our completed Cost Proposal, uploaded in the "Other" section of the DemandStar sourcing platform.

Confidential & Proprietary Information

As a part of our submission, we have included proprietary information, which should be held confidential, even when included in a Wisconsin Open Records Law request. We would like to request that the following documents/pages should be held confidential to the City and its representatives:

Description	Proposal Section	Proposal PDF Page
Proposal Management Team Resumes	Resumes	24
Coach USA Training Materials	Attachments	77
Coach USA Safety Leadership Training Manual	Attachments	81
Coach USA Safety Audit	Attachments	119
Coach USA Drug & Alcohol Policy	Attachments	167
Sample PM Checklists	Attachments	206
Coach USA Employee Handbook	Attachments	228

The City of Racine and Coach USA

Coach USA is a proven provider of high quality, safe, comfortable, timely and affordable transportation services. We are confident that long established Wisconsin Coach Lines will provide the high level of service that the City of Racine and its residents, as well as the rest of southeastern Wisconsin, have been accustomed to. We look forward to a continuation of the successful business relationship that has existed for many years.

COST PROPOSAL

COST PROPOSAL

Provide a cost per vehicle mile and not-to-exceed total vehicle miles proposal for services provided for each of the three years of the contract. Utilize the cost proposal form provided in Exhibit C. Your proposal must include fully allocated costs in the format shown. This includes the cost of depreciation and interest. No commissions will be paid. This must be submitted in a separate sealed envelope from your technical proposal.

Please see our separately attached Cost Proposal, uploaded in the “Other” section of the DemandStar sourcing platform.

TECHNICAL PROPOSAL

City of Racine
Official Notice #5-2022
Request for Proposal (RFP)
KRM (Kenosha-Racine-Milwaukee) Commuter Bus Service



03/21/2022	Published in Newspaper Published Online
03/23/2022	Published in Newspaper
03/29/2022	Questions due
04/01/2022	Addendums Posted
April 13, 2022 by 10:00am	DUE DATE Bid proposals received after this time will not be considered
Method of submittal	City of Racine Purchasing – DemandStar ONLY https://network.demandstar.com/agencies/wisconsin/city-of-racine-purchasing/procurement-opportunities/01dc3f5c-ed8d-466f-9fa8-3f31a8e08705/
Contact information:	City of Racine Purchasing 730 Washington Ave. Room 105 Racine, WI 53403 Email: purchasing@cityofracine.org Website: http://www.cityofracine.org/purchasing

The undersigned hereby proposes to furnish all labor, tools, equipment and all materials, except as definitely specified to be furnished by others, ready for use, all in accordance with these specifications, all as attached hereto and all of which the undersigned has examined, the following work for the compensation indicated.

Firm: Coach USA, on behalf of Wisconsin Coach Lines Inc.

Name: Thomas Dieckelman, Vice President & General Manager

Address: 1520 Arcadian Ave.

City, State, Zip: Waukesha, WI 53186

Phone: (262) 542-8861

Email: tom.dieckelman@coachusa.com

1. GENERAL INFORMATION

Introduction

The City of Racine (City) is seeking proposals for a service contract to provide commuter bus service between Kenosha, Racine, and Milwaukee, (“KRM Commuter Bus”). All routes will require accessible intercity type coaches equipped with restrooms.

The award under this solicitation is subject to a financial assistance contract between the City of Racine and the Federal Transit Administration and the Wisconsin Department of Transportation. The sole source of funds to pay for services under the proposed contract will be State and Federal transit operating assistance. The successful contractor will be required to comply with all applicable federal and state regulations and will be required to certify that it is not ineligible for a state or federally assisted contract.

The City of Racine, hereafter referred to either as the City of Racine or the “City”, has historically acted as the designated recipient of State of Wisconsin Urban Mass Transit and applicable Federal Transit Administration Operating Assistance for Commuter Bus Service operating between the Wisconsin communities of Milwaukee, Racine and Kenosha, hereafter referred to as “KRM Commuter Bus”. Section 85.20 of Wisconsin State Statutes authorizes mass transit operating assistance for urban areas that has traditionally covered 50% or more of a transit system’s operating expenses, but there is no guarantee made of a percentage. More information may be found <http://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/>. The City of Racine is a “Tier B” system. No City of Racine funding is available for this service.

General Terms

These instructions provide detailed legal and technical requirements for the purchase of professional services related to the operation of KRM Commuter Bus Service. You are requested to make a formal proposal to accomplish the Scope of Services described herein in the form prescribed. Your proposal is to be signed by a duly authorized official(s) of the proposer and shall be submitted to the City of Racine in the time and manner described.

Each proposal shall state that it is valid for a period of not less than one hundred twenty (120) days from the due date.

The City of Racine is the sole judge of the suitability of all respondents and reserves the right to reject any and all parts of the proposal that is not in the best interest of the City of Racine. The City reserves the right to amend or withdraw this RFP in the City’s sole discretion, including any timeframes herein, upon notification of all Respondents as set forth above, and in such case, the City shall have no liability for any costs incurred by any Respondent.

The proposal and all materials submitted with the proposal shall become property of the City and will be subject to Wisconsin Open Records Law. If any proprietary information is submitted with the proposal, it must be clearly identified and a request to keep such information confidential must be submitted.

Submission of a proposal shall constitute a binding offer by Respondent to provide the services at the prices described therein until such time as the parties enter into a PSA. The City may request additional information from any Respondent to assist the City in making its evaluation.

Respondent is solely responsible for all costs associated with preparing and submitting proposals. Such costs will not be borne by the City.

2. PROPOSAL

See Exhibit C – Cost Proposal

3. GENERAL QUESTIONS

Have you performed any work for the City of Racine in the past? YES NO

Are you part of the Disadvantage Business Enterprise (DBE) Program? YES NO

if you answered no, would you like more information? YES NO

Are you able to perform work for the State of Wisconsin? YES NO

4. RACINE WORKS PROGRAM (RWP)

The “Racine Works Program (RWP)” is a preferential hiring program used by the City of Racine to help residents of the City gain access to employment opportunities on City construction or City funded projects. The Racine Works Program is designed to promote employment of City residents as part of a contractor’s workforce on some City construction projects.

The City of Racine RWP procurement policy promotes the utilization of local workers and maximization of the economic impact of annual operating and capital project spending.

Bidders and contractors shall satisfy the [City of Racine Ordinance Section 46-41](#) if applicable.

5. REFERENCES

As a part of properly completing the proposal, provide the names, addresses, phone numbers and contact persons for a minimum of two companies or municipalities for which the respondent has satisfactorily performed related work within the past five (5) years.

Company Name: City of Waukesha Transit Commission

Address: 2311 Badger Dr., Waukesha, WI 53188

Contact Person: Mr. Brian Engelking

Phone Number: (262) 524-3634

E-mail: BEngelki@waukesa-wi.gov

Company Name: University of Wisconsin - Whitewater

Address: 734 W. Starin Rd., Whitewater, WI 53190

Contact Person: Ms. Lisa Miller

Phone Number: (262) 472-1425

E-mail: millerl@uww.edu

Company Name: Milwaukee World Festival Inc.

Address: 639 East Polk St., Milwaukee, WI 53202

Contact Person: Mr. Jason Stuewe

Phone Number: (414) 273-2680

E-mail: jstuewe@summerfest.com

We have included these references and a fourth customer reference in the Experience section of our Proposal.

EXPERIENCE

Describe the experience of your firm for this type of contract. List all such contracts during the last three years. Provide name, address, and telephone number of at least three client references.

Current Services Provided

Wisconsin Coach Lines has been operating various types of urban mass transit in southeastern Wisconsin for more than 80 years. Since 1941, WCL has developed new and innovative types of mass transit service (e.g., reverse commuter service, flexible employee shuttles, summer festival service, etc.) and has aggressively marketed these services with billboard advertising, television and radio advertising, newspaper advertising, social media, shrink-wrapped buses, and marketing grants.



Over the last 80 years, WCL has operated urban fixed-route and flexible route transit service between the following cities in Wisconsin:

Kenosha, Racine, & Milwaukee
Waukesha & Milwaukee
Mukwonago & Milwaukee
Oconomowoc & Milwaukee
Brookfield & New Berlin
Pewaukee & Waukesha
UW-Whitewater
Green Bay (WI) & Milwaukee
Minneapolis (MN) & Milwaukee

La Crosse & Milwaukee
Waukesha & Milwaukee
Janesville, Milton, Whitewater, East
Troy, Muskego, & Milwaukee
Watertown & Milwaukee
Fond du Lac & Milwaukee
Rockford (IL) & Milwaukee
Port Washington & Milwaukee

Having delivered public transportation solutions to southeastern Wisconsin for more than eight decades, our knowledge of Federal and State Transportation Funding programs is vast. As part of operating the City's commuter transit service, we are experienced in reporting for the Federal Transit Administration (FTA) and the National Transit Database (NTD).

City of Racine

Our relationship with the City began almost 60 years ago. In 1964, WCL began operating an inter-city commuter service between Milwaukee and Racine. Under the current contract with the City, WCL provides daily, scheduled round-trip transit service between points in Kenosha, Racine, Milwaukee's Mitchell International Airport and downtown Milwaukee.

In 2021, WCL carried nearly 27,000 passengers almost 220,000 miles – although our ridership was just over 50 percent of pre-pandemic passenger counts, we are optimistic that we will continue to recover and are prepared to once again operate at full capacity.

Additional Contract Services

Below, we have provided information on our current fixed-route and relevant charter services:

- **Waukesha County:** WCL is the current provider of daily mass transit services for Waukesha County, providing these services since 1976. The current service is presently contracted with Waukesha County and the City of Waukesha and is also administered by the City of Waukesha. We have transported over 550,000 passengers over the last five (5) years on this service.
- **Milwaukee-Janesville Loop:** WCL is the current provider of daily mass transit service for the State of Wisconsin operating the Milwaukee-Janesville Loop service. WCL began providing this service in 2016. The current service is contracted with the State of Wisconsin's Department of Transportation as part of the Section 5311 program. We have transported over 5,000 passengers over the last five (5) years on this service.
- **Coach USA Airport Express:** WCL operates Coach USA Airport Express, which provides hourly service with ten southbound and northbound trips from Waukesha, Milwaukee, Racine and Kenosha Counties to Mitchell and Chicago's O'Hare Airports, 7 days a week, 365 days a year. (The service was reduced from 15 trips due to COVID-19; we anticipate a return to 15 trips over the next few months.) This service has been operated by Wisconsin Coach Lines since April 2002. As this service is privately operated, this information is proprietary in nature. We can share ridership numbers in private should the City have an interest in discussing this further.
- **University of Wisconsin - Whitewater:** WCL presently provides scheduled weekend transit service between Milwaukee, Waukesha, and the University of Wisconsin - Whitewater since 1998. This service is currently contracted with the University of Wisconsin - Whitewater. We have transported over 5,000 passengers over the last five (5) years on this service.
- **Summerfest:** WCL provides scheduled transit service between various Waukesha County Park and Ride lots and the Summerfest grounds for the duration of the festival, although suspending in 2020 and 2021, due to COVID-19. This service is provided to the citizens of southeastern Wisconsin through the combined resources of WCL and its sister company. Over the past years, residents of southeastern Wisconsin have depended on this service as a safe, reliable mass transit service. As this service is privately operated, this information is proprietary in nature. We can share these ridership numbers in private should the City have an interest in discussing this further.
- **The Jingle Bus:** WCL operates "The Jingle Bus" throughout downtown Milwaukee in conjunction with the Milwaukee Business Improvement District No. 21. This fixed-rate service operates throughout the Christmas holiday season, although suspending in 2020 and 2021, due to COVID-19. WCL has been providing this service for over 20 years. We have transported over 30,000 passengers over the last five years on this service.

- **Wisconsin State Fair:** WCL provides scheduled transit service between various Waukesha County Park and Ride lots and the Wisconsin State Fair for the duration of the Fair, although suspending in 2020 and 2021, due to COVID-19. As this service is privately operated, this information is proprietary in nature. We can share these ridership numbers in private should the City have an interest in further discussion.
- **Washington County Commuter Express (WCCE):** WCL is the current provider of daily mass transit services for Washington County's Commuter Express since 2021, having secured this service through a competitive bid process during the pandemic.
- **Milwaukee-Minneapolis:** On January 1, 2022, WCL began operation of this route. In partnership with the Wisconsin Department of Transportation through the Section #5311 program, WCL operates this daily service, each way, between Milwaukee, Green Bay, Wausau and Minneapolis, and other rural cities in between. As one of the key goals of the #5311 program, this route provides service to many rural communities that would otherwise not have transportation options. This route also provides important connections for students at University of Wisconsin System schools as well as other colleges and universities.
- **Milwaukee-La Crosse:** Also starting on January 1, 2022, WCL began operation of this route. Again, in partnership with the Wisconsin Department of Transportation through the Section #5311 program, WCL operates this daily service, each way, between Milwaukee, Johnson Creek, Madison, Baraboo, Sparta and La Crosse. This route, too, provides key connections for students.
- **Amtrak Thruway Service:** Since 2019, WCL has partnered with Amtrak to provide "Amtrak Thruway" bus service between Milwaukee and Green Bay. Trips connect at the Milwaukee Intermodal Station to the Amtrak Hiawatha service that runs between Milwaukee and Chicago, while also connecting with many other intermodal options at the Milwaukee station.

Coach USA Company Overview

Coach USA is one of the leading providers of ground transportation and mobility solutions in North America, with operations in 27 locations throughout the United States and Canada and a fleet of over 2,250 vehicles. We are the largest privately-owned, U.S.-based bus operator in the country.

Coach USA's affiliates and subsidiaries have been offering transportation solutions for nearly 100 years. Coach USA and its affiliate companies are trusted business partners providing many types of specialized ground transportation solutions to government agencies, airports, colleges and universities, and major corporations. In today's world, which has recently seen an immense amount of change and insecurity, we understand our role to not only provide transportation services but to also promote and generate wider economic growth through job creation and improved access to safe, reliable, and affordable transportation.



Coach USA operates a wide variety of passenger transportation services, including:

- Fixed-route, commuter, and express services for large, medium, and small transit authorities
- Fixed-route critical employee transportation shuttles to the industrial sector
- Airport and University shuttle operations
- Paratransit operations and on-demand service
- Transportation Management
- Charter operations

Coach USA operates in states across the US, including Wisconsin, Maryland, Virginia, District of Columbia, New York, New Jersey, Pennsylvania, West Virginia, Ohio, Indiana, Texas, Illinois, California, Wyoming, Nevada, Florida, and Georgia. In Canada, we also own two operating companies, which together operate around 400 vehicles in the Provinces of Quebec and Ontario under the Coach Canada brand. In addition, our affordable inter-city coach service, megabus.com, links around 80 cities across the Midwest, Northeast, and Western part of the United States and Canada. Coach USA operates over 120 million miles each year with more than 5,000 employees nationwide.

Due to the diverse range of transportation services we provide, we have experience working with a variety of customers, both private and public, including:

- Municipalities
- Transit Authorities
- Airports
- Railroads
- Mining and Construction Contractors
- Colleges and Universities
- Corporations
- School Districts
- Casinos
- US Military
- Cruise Lines

Our experience, coupled with the vast resources of our parent company, make Coach USA a first choice to deliver consistently great service to passengers across North America.

Other Transportation Experience

Ground passenger transportation is our core business. Coach USA has the operational infrastructure, management expertise and financial strength to meet all of the City's service requirements. We have extensive experience in providing regularly scheduled transportation service. The services we currently provide across North America are some of the highest quality services offered in the industry today. This is evidenced by the long-term partnerships we have with many agencies and companies.

Client References

City of Waukesha Transit Commission	
Location of Service	Waukesha, WI
Operated Since	1976
Service Description	Daily commuter transit service between various Waukesha County park and ride lots and Downtown Milwaukee and UWM
Reference Contact	Mr. Brian Engelking City of Waukesha Transit Manager 2311 Badger Dr. Waukesha, WI 53188 Email: BEngelki@waukesha-wi.gov Phone: (262) 524-3634

University of Wisconsin – Whitewater	
Location of Service	Whitewater, WI
Operated Since	1998
Service Description	Weekend commuter transit service between UW-Whitewater, Waukesha, and Milwaukee
Reference Contact	Ms. Lisa Miller 734 W. Starin Road Whitewater, WI 53190 Email: millerl@uww.edu Phone: (262) 472-1425

Milwaukee World Festival Inc.	
Location of Service	Milwaukee, WI
Operated Since	1995
Service Description	Special Event commuter transit service
Reference Contact	Mr. Jason Stuewe Milwaukee World Festival, Inc. 639 East Polk Street Milwaukee, WI 53202 Email: jstuewe@summerfest.com Phone: (414) 273-2680

Milwaukee Business Improvement District No. 21	
Location of Service	Milwaukee, WI
Operated Since	1998
Service Description	Special event holiday service
Reference Contact	<p>Ms. Beth Weirick Executive Director 301 W. Wisconsin Avenue, Suite 106 Milwaukee, WI 53203 Email: bweirick@milwaukeedowntown.com Phone: (414) 220-4700</p>



RESUMES

Provide a detailed resume for each management person proposed to work on this project.

Proposed Management Team

None of the policies and programs in place for the City matter without the right management team to implement them. Coach USA is proud to propose the following management team for the City's service.



Tom Dieckelman

Vice President and General Manager

Mr. Tom Dieckelman, a twenty-four-year veteran of Wisconsin Coach Lines, oversees all aspects of the company. In addition to proposal writing and contract oversight, Tom brings a solid background in operational management including experience in matters concerning state insurance, workers' compensation, labor relations, human resources, advertising, and marketing.

Tom received his Bachelor of Business Administration in Marketing from the University of Notre Dame. He is very active in many professional organizations. Presently he serves on the Board of Directors of the Wisconsin Motor Coach Association; Secretary of the O'Hare Intercity Bus Association; a member of the Wisconsin Public Transportation Association (WIPTA); and a member of the United Motorcoach Association (UMA) as well as the American Bus Association (ABA).

Locally, Tom serves on the Board of Directors of YMCA of The Greater Waukesha County; the Board of Directors of the Waukesha County Business Alliance including the Infrastructure and Governance Committees; the Board of Directors of the WOW (Waukesha, Ozaukee, Washington Counties) Workforce Development Board; on the Advisory Committees on Transportation System Planning and Programming for the Racine Urbanized Area, the Kenosha Urbanized Area, and the Milwaukee Urbanized Area; an active member of the Waukesha Rotary including board member of the Waukesha Rotary Foundation Fund; an active member of VISIT Milwaukee; and is the past President of the Waukesha & Pewaukee Convention & Visitors Bureau. In addition, he serves as treasurer for the Lovers Lane Estates Recreational Development Fund and serves on the Athletic Board of his parish, St. Dominic-Brookfield. He is also actively involved in the community and has coached youth basketball, baseball, and hockey for over 30 years.

Mr. Dieckelman is a native of Elm Grove, Wisconsin and currently resides in Pewaukee.



Mike Pjevach

Senior Vice President | West Region

Mr. Mike Pjevach, the Senior Vice President over all Coach USA operations in the West Region, including Wisconsin Coach Lines, has more almost 35 years of experience in transportation and management roles. Prior to his tenure at Coach USA, Mike served as the Controller, Vice President, and CFO of Wisconsin Coach Lines, prior to the Coach USA acquisition. In his current role, he oversees all operations, revenue, business development, recruitment, retention, safety, and maintenance for his region's Coach USA subsidiary operations. During his twenty-four years of service with Coach USA, he has provided focus and stability throughout the entire company.

Mike received his Bachelor of Business Administration in Accounting from the University of Wisconsin (Madison). He is active in many professional organizations, including both the Wisconsin Institute of Certified Public Accountants and the American Institute of Certified Public Accountants.

Mike is also active in the local Pewaukee and Waukesha communities. Over the course of his career, he has served in leadership roles and as a board member for several organizations, including the Advocacy Policy Board Chairman for the Waukesha County Business Alliance, and the Waukesha Education Foundation. Mike has also been an active member of the Waukesha Area Chamber of Commerce, serving as the Board Chairman, a Member of the Executive Committee. Mike served Commissioner for the City of Pewaukee Public Works Commission and was a Member of the Board of Directors and Finance Committee.

Mike is a Wisconsin native and currently resides in Pewaukee.

Resumes

We have included Mike and Tom's resumes in the on the subsequent pages of this section of our Proposal.

Tom Dieckelman

Vice President, General Manager
Wisconsin Coach Lines

Summary

Mr. Tom Dieckelman is a hands-on manager with over two decades of experience in the leadership of transportation operations for Wisconsin Coach Lines, a Coach USA Company. During this time, he has shown his dedication to safe and efficient operations for the Wisconsin and Midwest regions, including operation of public transit, airport shuttles, charter services, and special event transportation.

Education

University of Notre Dame,
Bachelor of Business Administration,
1984

Affiliations

Wisconsin Public Transportation
Association (WIPTA)

Wisconsin Motor Coach Association

O'Hare Intercity Bus Association

United Motor Coach Association

VISIT Milwaukee

Southeastern Wisconsin Regional
Planning Commission (SEWRPC),
*Advisory Committees on
Transportation System and
Programming for Racine, Kenosha,
and Milwaukee*

Experience

Wisconsin Coach Lines/ Coach USA | Waukesha, WI

Vice President, General Manager | 1997-Present

- Develops and manages financial and operating cost budgets.
- Responsible for the day-to-day operations of Wisconsin Coach Lines including the administration of the City of Racine's inter-city commuter service contract; Waukesha County's Commuter Mass Transit routes #901, #904 and #905; the WCCE (Washington County Commuter Service) commuter contract; daily service between Milwaukee and Janesville; daily service between Milwaukee and Minneapolis; daily service between Milwaukee and La Crosse; daily service between Milwaukee and Green Bay; daily airport service to Mitchell and O'Hare airports; and private charter department and group tours.
- Responsible for over 80 employees operating out of 3 different facilities.
- Responsible for the acquisition and disposal of approximately 50 vehicles, operating approximately 3,000,000 miles annually.
- Handles grant and proposal writing.
- Develops and implements marketing and advertising strategies.
- Actively involved in developing and implementing new routes and innovative service ideas.
- Responsible for revenue growth and cost controls.

Milwaukee Admirals Hockey Team | Milwaukee, WI

Assistant General Manager | 1984-1997

- Responsible for day- to- day operations of organization, budget management, player contracts and negotiations.
- Managed team and corporate travel and scheduling, purchasing, sales, media relations, and immigration matters

Civic Involvement

WOW Workforce Development Board, *Board of Directors*
Waukesha County Business Alliance, *Board of Directors*
YMCA of Greater Waukesha County, *Board of Directors*
Waukesha Rotary Club, *Board Member of Rotary Foundation*
Lover's Lane Estates Recreational Development Fund, *Treasurer*
St. Dominic Parish-Brookfield, *Athletic Board of Directors*



Mike Pjevach

Senior Vice President

West Region | Coach USA

Summary

A Senior Executive with over 30 years of experience in all aspects of leading and managing transportation operating companies, Mr. Mike Pjevach has provided focus and stability through the history of Coach USA. He was employed with Wisconsin Coach Lines prior to its acquisition by Coach USA. During this time, Mr. Pjevach grew professionally from Controller to Vice President and President. His experience with multiple modes of transportation is a proven asset to Coach USA.

Education

University of Wisconsin, Madison
*Bachelor of Business Administration,
Concentration in Accounting*

Professional Affiliations

Wisconsin Institute of Certified
Public Accountants, *Member*

American Institute of Certified
Public Accountants, *Member*

Experience

Coach USA | Paramus, NJ

Senior Vice President, West Region | 2012-Present

- Oversee the Operations, Revenue, Business Development, Employee Recruitment and Retention, Safety and Maintenance for various local operating subsidiaries across the United States.
- Current Region consists of seven operating subsidiaries operating out of thirteen facilities in the West and Midwest

Vice President, Integration | 2012

- Led the integration of nine (9) transportation companies purchased out of bankruptcy from Coach America
- Worked with local management teams to acclimate to the Coach USA operational and safety policies and procedures

Dairyland Group | Waukesha, WI

President, General Manager | 1998-2011

- Promoted to position in 1998 after Wisconsin Coach Lines Group was acquired by Coach USA, Inc.
- Total Group revenues grew to \$46 million with approximately 850 employees. Under my direction, we successfully transitioned from a locally owned group of companies to a national publicly owned organization.
- Key member of the top management team of the group of companies since 1988. From 1988 to November 2011, the team profitably grew the companies from \$3 million to \$46 million in revenues.

Lakeside Buses of Wisconsin Inc. | Milwaukee, WI

President, General Manager | 1997-1998

- Lakeside was a \$10 million, 300-employee company.
- Negotiated contracts with Milwaukee Public Schools.
- Successfully bid contracts and managed a large staff.



Mike Pjevach

Region Vice President

West Region | Coach USA

Wisconsin Coach Lines Inc. | Waukesha, WI

Vice President, Chief Financial Officer | 1990-1997

- Responsible for the financial, personnel, operations and administration functions of the companies.
- Developed and implemented operational, management, financial reporting and information systems.
- Developed marketing strategies and plan
- Managed personnel, recruiting and training functions.
- Negotiated financing including traditional loans and TRAC leases.
- Managed the design and construction of a \$1.5 million building and operating facility.

Controller | 1988-1990

- Developed accounting systems to allow for accurate and timely financial information.
- Developed internal controls and management reports that allowed companies to profitably grow.

Arthur Anderson & Company | Milwaukee, WI

Senior Accountant | 1985-1988

- Worked in Small Business Division that specialized on privately owned companies.
- Planned, organized and coordinated audit and non-attest engagements.
- Analyzed accounting and operating procedures to identify weaknesses and prepared written recommendations.
- Extensive continuing professional education courses including various accounting subjects, tax, computer and professional development.

Civic Involvement

Waukesha County Business Alliance, *Member of Board of Directors and Finance Committee, Advocacy Policy Board Chairman*

Waukesha Education Foundation, *Board Chairman, Member of Board of Directors*

City of Pewaukee, *Public Works Commission, Commissioner*

Waukesha Area Chamber of Commerce, *Board Chairman, Member of Executive Committee of Board of Directors, Member of Board of Directors and Finance Committee*

Waukesha County Economic Development Corporation, *Member of Board of Directors*

Waukesha Family YMCA, *Member of Board of Directors*

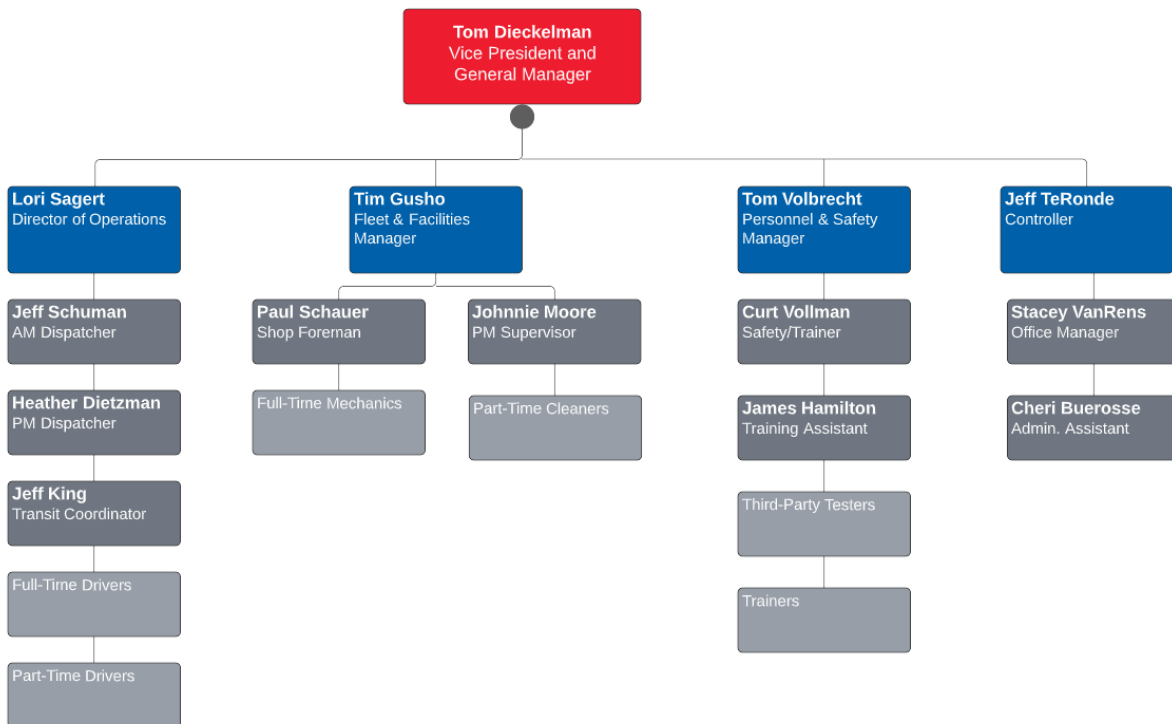
Potawatomi Boy Scout Council, *Member of Board of Directors*

United Cerebral Palsy of Southeastern Wisconsin, *Member of Board of Directors and Finance Committee, Chairman of Endowment Fund Committee*



Proposed Staff Organization Chart

WCL has a strong team supporting Mr. Dieckelman in the oversight and management of the City's transportation services. We have included an organization chart of the local support staff, as well as introductions below.



Additional Management Team

We have also included a brief introduction to the other members of our local management team below:

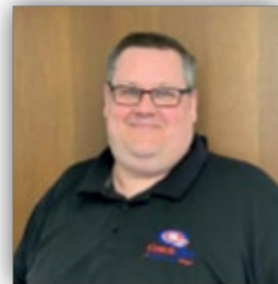
Lori Sagert, Director of Operations

Ms. Sagert has more than twenty-one years of experience with Wisconsin Coach Lines in public transportation including operations, customer service, safety, commercial drivers' license training and administration. She coordinates and schedules all motor coach drivers' work assignments. Ms. Sagert also serves as a contact for managers who require guidance on company policy and employment law issues.



Thomas Volbrecht, Personnel and Safety Manager

Mr. Volbrecht, an 18-year veteran in the transportation safety field, serves as Wisconsin Coach Lines' personnel and safety manager, responsible for employee relations, the company's drug and alcohol program, recruitment, benefits, disability and worker's compensation insurance, compensation, and company policy development. He conducts regular on-site safety audits to ensure compliance with state and federal regulations and the Wisconsin Coach Lines Occupational Safety and Health Program. He also conducts regular safety training sessions for management, supervisors and drivers. In addition he provides Wisconsin Coach Lines with monthly loss summaries and to identify possible safety-related trends. Mr. Volbrecht has been with Wisconsin Coach Lines for 4 years



Tim Gusho, Fleet and Facility Manager

Mr. Gusho has been directly involved with transportation maintenance for over 35 years including 26 with Wisconsin Coach Lines. Mr. Gusho's experience includes purchasing vehicles and parts, maintenance procedures, and administrative procedures. Mr. Gusho earned his degree from MATC (Milwaukee Area Technical College). He is certified, qualified and has advanced training in diesel engine repair, air and hydraulic brakes, and motor coach air conditioning equipment. Additionally, Mr. Gusho has experience with a variety of fleet analysis software. Mr. Gusho has taught seminars on brake systems, air conditioning systems and a variety of other maintenance related items.



Jeff TeRonde, Controller

Mr. TeRonde has held the position of Controller for Wisconsin Coach Lines for 8 years. His duties include establishing and staffing the financial functions, implementing internal systems, developing and initiating internal cost control systems and preparing financial plans. He also develops company- wide budgets and has overall responsibility for company- wide tax reporting and regulations. In addition, Mr. TeRonde oversees environmental compliance, federal and state payroll regulations, and serves as the company's information management specialist.



Before joining Wisconsin Coach Lines, Mr. TeRonde served as Controller of SEAL Analytical, Inc. and Lachat Instruments.

Mr. TeRonde earned a Bachelor of Science degree in accounting from Ball State University. He is a Certified Public Accountant (CPA) and a Certified Management Accountant (CMA).

MANAGEMENT METHODOLOGIES/ PROCEDURES

Provide a narrative describing management tools, procedures, philosophy, and practices used by your firm to conduct the type of activity required by this contract. Provide a detailed Scope of Work with a timeline for implementation. Provide a detailed marketing plan. Contractor will state in the proposal that it is willing to adjust the schedule and revenue hours of this route to meet changing shift times of the riding public while working within the constraints of revenues and the state operating assistance percentage.

Overview

Wisconsin Coach Lines is committed to providing our passengers with a safe, comfortable, convenient and cost-effective ride. We are driven by this goal and have developed our management approach and operating procedures to ensure that we deliver to our customers. In the following sections, we have highlighted some of the key philosophies, practices, procedures and tools we use in the daily running of our business. Wisconsin Coach Lines has developed proven operational systems and methodologies that result in the superior customer service that is valued by our customers.

Our intent in this proposal is to highlight the strengths of a continued partnership with Coach USA/ Wisconsin Coach Lines, including information about our facility, our management team and staff, our safety and training programs, proposed technology, and our vehicle maintenance program.

Should any part of this proposal remain unclear to the evaluation team, we would like to extend an invitation all members of the evaluation committee and other representatives from the City of Racine to visit any of our terminal facilities at their convenience.

Wisconsin Coach Lines Facility

All of our buses used to operate the City's service will originate out of the main Wisconsin Coach Lines facility, located at 1520 Arcadian Avenue in Waukesha, Wisconsin. The service will be supported at a satellite WCL facility in Kenosha. The main WCL terminal is a full-service facility designed specifically for buses. It is situated on twelve acres, equipped with management, dispatch, and administration offices, driver training and breakroom, eight maintenance bays with hydraulic lifts (two of which also serve as wash bays), a maintenance pit, a fully stocked parts room, and a 10,000-gallon diesel bulk fueling station.



Our main facility is conveniently located less than 50 miles from all of the stops on the City's commuter routes, making our location ideal for mapping routes, and allows for immediate response in the event of a road repair or emergency.



We have highlighted additional components of our main facility below:

- **Paved Lot:** This facility was built specifically for buses. This is important because the pavement and underlying base was designed for the weight of large diesel buses. The entire lot is paved which provides numerous advantages, including storm water flow, snow removal, pavement markings for orderly/systemized bus parking, solar melting/drying in winter, etc.
- **Fenced:** All of the buses are parked in a fenced area for security reasons. The fencing is topped with barbed wire.
- **Lot Lighting:** The parking lot is well lit for additional security.
- **24-Hour Video Surveillance:** The facility is also secured by a video surveillance system with 16 strategically placed cameras. Recordings of activities are kept for over 14 days in the Digital Video Recorder (DVR).
- **Fueling System:** The on-site fueling system features a 10,000 gallon above ground fuel station allowing for nightly fueling of all buses.
- **Parking Stalls:** All parking stalls are well marked with stall striping. Each bus has a specific parking stall assigned, which is labeled with a corresponding sign.
- **Emergency Generator:** Wisconsin Coach Lines has an emergency generator to power the key operating systems including lights, radio system and telephone, if needed.
- **Electric Block Heater Plug-Ins:** Every bus stall is equipped with a GFI outlet so that bus block heaters can be plugged in to ensure cold weather starting.
- **Plug-In System Monitoring:** A sophisticated management system of the lot electric service is utilized to monitor temperature and time for delivering power to the circuits used for the bus stall outlets.
- **Electric System Monitoring:** A software system is utilized that monitors the facility electric service and will automatically call the facility manager if power to the facility is interrupted.
- **Snow Removal:** When necessary an outside contractor is utilized for snow removal. A wide range of equipment is available to handle small snow events, ice storms, and snowstorms all the way up to blizzards. This snow removal equipment includes plow trucks, large plow trucks with major blades, bobcat loaders, large loaders, dump trucks, and salting. We supplement the process, when necessary, with our service trucks, which allow us to do miscellaneous clean up after snow events.
- **Office Design and Layout:** The large office space allows us to have all functions located together consisting of the drivers' room, dispatch department, human resources, payroll, accounts payable and receivable, safety and training, and sales and customer service. The driver's room is open 24 hours a day, 365 days a year. All office space utilizes an open area concept. Each workstation is equipped with personal computers connected to the Coach USA wide area network (WAN) that allows us to communicate with our sister companies. All workstations have modern phones with full voice mail capabilities. Wisconsin Coach Lines has an emergency generator to power the key operating systems if needed.

- **Maintenance Department:** The maintenance shop has eight service bays. Each bay is well light with new LED lighting and equipped with numerous amenities for our extensive preventive maintenance program. In addition, two bays are used nightly for the cleaning of the buses in our wash bay. A parts room is located on the second floor.

Scope of Services, Timeline, & Schedule

As Wisconsin Coach Lines is the present provider of this service, our timeline is as basic in that we are ready to continue operating the present routes with the schedule on July 1st, 2022, the estimated start time of the new contract.

Dispatch and Daily Operations

We have an experienced staff that is managed by our Director of Operations. Our dispatch department is staffed according to service needs. Our operations department uses many tools to assist them in running an efficient operation.

All work is dispatched from our dispatch sheet. We refer to each work assignment as a “board”, which may consist of one or more trips. Drivers are assigned work and are required to report to work at standard report times for each board. The dispatcher checks-in the driver on the dispatch sheet and the driver is given a bus clipboard.

This clipboard includes the previous driver's completed Driver Vehicle Inspection Report (DVIR), along with detailed route instructions and routes signs. The driver reviews the previous DVIR and signs it. In addition, the driver completes a new DVIR report that is used during the work assignment. The driver reports to the assigned bus and completes a thorough pre-trip vehicle inspection. Should the driver find a safety defect, the driver will get a different bus assignment. In addition, the driver completes a security inspection of the bus.

During the work assignment, the driver will display the appropriate trip sign to allow passengers to identify the trip being operated by the specific bus.

On each trip, the driver is required to record each boarding passenger for ridership analysis. In addition, drivers are required to collect other data as necessary.

Dispatchers rely on an operational magnetic planning board, which visually shows driver and bus assignments. The board also displays available standby buses and drivers. The magnetic planning boards are large enough for all operational staff to clearly see and refer to. In addition, a live television monitor in dispatch shows all buses with their “real time” locations via a GPS system installed in all of our buses.

Upon completion of the work assignment, the driver returns to the terminal and parks the bus in the assigned parking stall. The driver conducts a post-trip vehicle inspection. During this inspection, any bus defects are recorded on the DVIR and the driver searches for “lost and found” items. The driver returns the bus clipboard to the dispatch office, along with the completed DVIR, data collection forms and any “lost and found” items.

Recruiting, Hiring & Training Program

Increased Recruiting Efforts

Coach USA has not been immune to the driver shortages plaguing the general passenger transportation industry. While we have seen much improvement over the preceding months, we have and will continue to take steps to bolster our recruitment and retention efforts. We are confident that we will continue to have the staffing and resources to continue carrying out the City's transportation services.

Some of the additional measures are outlined below:

- Coach USA has partnered with **ADP Recruitment Process Outsourcing** (RPO) at several of our nationwide locations (including WCL) to take advantage of their industry-leading employee recruitment services. ADP RPO helps fill hourly, professional, or executive level positions with talent acquisition training and tools provided by AIRS®-certified recruiting professionals.
- Job Advertising, Job Fairs, & Interview Events
- Incentives and Bonuses

Training Program

The Coach USA driver training program is a highly regimented and professionally developed course built around curriculum featured learning opportunities in two key domain knowledge (education) and skills (training).

Coach USA uses various mechanisms to support the learning process, such as classroom, multimedia presentations, closed course, observation and behind the wheels training, etc. In effort to help the employee retain the information and practice the skills they have acquired, we evaluate learning through written quizzes, driving tests, route test, and customer service skills evaluations.

Coach USA also documents all training, behind the wheel observations, physical results, drug and alcohol testing, background checks, and reference checks. Only the drivers who have successfully completed our extensive training program are qualified to operate our fleet of vehicles.

All new hires receive a minimum of 110 hours of training including route training, vehicle familiarity, vehicle maneuvering, passenger assistance techniques and customer service, regulatory requirements, sexual harassment, first-aid, blood borne pathogens, hazardous materials, and ADA requirements.

Training Overview

Coach USA invests in training for all employees from drivers to managers. Key elements of our training and development program include employee development, world class safety, excellent passenger care and operational performance, and regulatory compliance. Further, our training is focused on building consistency in practices. We ensure that training is relevant and accessible to our employees and we rely on internal resources to do the majority of our training.

The expected results of our commitment to training are:

- Improved retention
- Job mobility
- Improved customer service
- Better system performance

Driver Training

Driver Training Content

Regardless of the training program, Coach USA will ensure the following types of training are provided to all drivers:

- **New Hire Training:** This training will include classroom, closed-course driving, and road training. The time required for each trainee will depend on whether or not the trainee possesses prior commercial driving experience.
- **Refresher Training:** Every two (2) years, every driver will receive a minimum of eight (8) hours of refresher training. Topics for “refresher” training will include any updated Coach USA policies and procedures, safety awareness, customer service, and passenger awareness and sensitivity.
- **Remedial Training:** Triggers for remedial training include, but are not limited to accidents, excessive passenger complaints, alerts from our Driver’s Alert system or being off work for extended periods of time.
- **Evaluations:** Every driver and staff member who operates a vehicle will be evaluated through an in-service ride check at least annually.
- **Certifications:** License, background, and medical certification checks will be conducted in accordance with state and federal regulations.

New Driver Development Program

For vehicle drivers, Coach USA must certify in writing that each individual driver has satisfactorily completed all requirements and training courses prior to allowing that individual driver a bus in revenue service. This certification requires a minimum of 110 hours of training for each driver, both full and part-time. The exception shall be any person for whom Coach USA can provide written documentation of one year’s experience as a driver in a different operation operated by Coach USA and at least 40 hours of formal training. Experience and training with other transportation systems; including other public transit agencies or school systems is not acceptable. Our training programs exceed all federal requirements for training for passenger transportation drivers.

Coach USA’s New Driver Development Program provides consistent and thorough training to all new drivers. The comprehensive base program is customizable on a local level to address specific areas of concerns, e.g., unique service area, specific vehicle or service type, and dispatch procedures.

Classroom Training

The instructor-led classroom training is based on an adult-learning interactive training model and uses thirty-one (31) video training modules which are reinforced by the written training/study guide.

The video training is presented through an interactive, panel-hosted discussion led by Coach USA personnel. Topics include safety, defensive driving principles and techniques, hazards communication, security awareness, ADA compliance, employee policies and procedures, employee wellness, sexual harassment, bloodborne pathogens, map reading, and on-road procedures.

Testing occurs at the end of each module and at the end of classroom training with a cumulative, closed-book exam. Employees must pass with a score of 80 percent or higher in order to proceed to behind-the-wheel training.

Upon successful completion of classroom training, students receive instruction in Pre-Driving Skills, Observation, and Behind-The-Wheel Training.

Training Type	Total Hours
Classroom	30
Pre-Driving Skills	3
Observation	40
Behind-the-Wheel	37
Total Hours	110

Pre-Driving Skills

Designed to familiarize the student with the larger size and spacing of commercial vehicles before driving the vehicle on the street, the pre-driving skills course training requires that all students learn the use of multiple mirrors and vehicle controls.

Observation

Observation training is provided and gives students an opportunity to study the proper way to handle a vehicle. Once a student has successfully completed all pre-driving skills and observation training, they begin closed course training followed by driving the vehicle on the street with a training instructor.

Behind-the-Wheel (BTW) Training

Behind-the-wheel training focuses on honing specific basic driving maneuvers and skills necessary to ensure the safe operation of the vehicle under actual road operation. During BTW training, the student puts into practice what he/she has learned in the classroom and refines his/her driving skills with a certified trainer. During this period, the student must demonstrate mastery of 26 specific defensive driving and performance skills before graduation.

Before a student is released into service, he/she is closely monitored and receives a final road and training evaluation.

Other Training Content

Defensive Driving - LLLC



All accidents have a cause, which can always be traced back to one or more people – most commonly the driver of one of the vehicles involved in the collision. This underscores the importance of an effective defensive driving training curriculum.

Coach USA built its training curriculum upon the Triple L-C, an elegant and easy- to-memorize defensive driving course that teaches professionals *The Four Driving Principles to Safety™*:

- Look Ahead™
- Look Around™
- Leave Room™
- Communicate™

By using these four principles, drivers maintain the maximum amount of room around their vehicle, improve their visibility, gain the extra time and information needed to make critical decisions while driving, and effectively interact with others on the road to prevent collisions. Developed throughout the course, these concepts provide Coach USA's drivers with everything they need to know to avoid collisions. Ultimately, the course helps drivers see, think, and act their way through any driving situation.

Customer Service Training Program

At Coach USA, we know that our drivers are the face of our transportation service. We emphasize excellence in customer service throughout our training programs.

Our stated purpose is to be a trusted and successful transport business and a respected community partner. We do this every day by supporting our people to deliver a great personal travel experience for our passengers and create sustainable growth for our communities. Our values of **Safety, Service, Integrity, Enterprise, and Partnership** lie at the core of our dedication to customer service. Our customer service training includes interactive sessions dedicated to impressing these values on our employees in the context of the specific services we offer.

The following are the key elements of our customer service training provided to every employee:

- Review of our Mission and Core Values
- Introduction to the Passenger
- Delivery of the exemplary customer service
- How to remain in control, even in difficult situations
- Practice sessions and role playing
- Self-assessment

Our training program encourages every employee to treat our passengers with respect and attention, both to their personal needs, and to their time.

Satisfaction can only be judged by the passenger. When approaching any service, our drivers have a direct effect on the perception of our service by the passenger. It is our goal for every passenger experience to be a positive one. We focus our efforts on both verbal and non-verbal communication, good decision-making, and conflict avoidance.

Training Manual

We are committed to providing the tools necessary to train drivers to operate their vehicles in the safest manner possible within manufacturer’s guidelines.

Resources provided to ensure the implementation of this policy include:

- Coach USA Drivers’ Training Manual
- Drivers Logs (Electronic)
- Bussing on the Lookout
- On-the-Road Review
- Accommodating Passengers with Special Needs
- A Professional Driver Video Series
- Americans with Disabilities Act (ADA)
- Wheelchair Lift Training
- Applicable Government Regulations (e.g. Federal, state/provincial, local, FTA, OSHA)
- Vehicle Equipment Manufacturer’s Specification and Guidelines

We have provided a sample training syllabus and Table of Contents from the extensive Coach USA Training Program in the **Attachments** section of this proposal.

Additional and Ongoing Training

Recurrent Training

Every driver who routinely operates a commercial motor vehicle is required to periodically undergo additional training. This training uses the resources of Coach USA in the form of videos, online training, and in-person safety meetings. Modules include a variety of topics, including defensive driving refreshers, accident prevention, and passenger relations.

Driver Refresher Training

Coach USA requires mandatory retraining at the following points of a drivers’ employment:

Type of Retraining	When Provided	Training Length	Description of Training
Return to Work (After 30 or more days of inactive status)	Required when a driver returns from “inactive” status equaling thirty (30) or more days.	8-hours	This training consists of both classroom and behind-the-wheel components. Focused on safety standards, defensive driving skills, and vehicle familiarity.
Post-Accident (for cause)	Required for any driver who has received a “preventable” rating for an accident/incident. This training must be scheduled and given within ten (10) days following	Varies based on the driver’s ability to perform the appropriate tasks to standard.	Post-accident retraining is focused on correcting driving deficiencies and standards that contributed to the accident. The driver must demonstrate ability to perform all of the required tasks to standard before

Type of Retraining	When Provided	Training Length	Description of Training
	the formal accident rating.		being allowed back to driving duties.
Seasonal Refreshers	These refreshers are conducted in preparation of operations during certain periods of the year, typically in the fall.	Varies based on location and topics.	The training will include topics/material appropriate for the region, inclement weather, environmental, and traffic conditions.

Driver's Alert

Driver's Alert was one of the first companies to offer a third-party decal-based driver observation program. Since 1989, Driver's Alert has fielded more than 30 million calls under its 1-800 'How Am I Driving?' program called SmartWatch™.

Included with the 'How's My Driving?' program are 17 eLearning courses designed to raise employee awareness and to address specific unsafe driving behaviors identified by concerned motorists. When a call report comes in, the supervisor has the option of assigning the appropriate training course to the driver. This is one more way of ensuring that our drivers drive more safely. Corrective action courses include:

- Distracted Driving
- Smartphones and Smarter Driving (Micro Course)
- Seat Belt Safety (Micro Course)
- Speeding Awareness – Large Vehicles
- Speeding Awareness – Small Vehicles
- Changing Lanes – Large Vehicles
- Changing Lanes – Small Vehicles
- Tailgating Awareness – Large Vehicles
- Tailgating Awareness – Small Vehicles
- Stop Signs and Signals – Large Vehicles
- Stop Signs and Signals – Small Vehicles
- Failure to Yield – Large Vehicles
- Failure to Yield – Small Vehicles
- Driving Your Brand
- Pre-Trip Inspections – Small Vehicles
- Pre-Trip Inspections – Large Vehicles
- Closing the Loop

Safety Leadership Training Program

Every member of our leadership team must personally take ownership of our safety results. Our managers have a lot of responsibility: productivity, environmental standards, and uninterrupted operations are just a few key areas where their energies are focused. However, safety is a core value and is a part of everything that Coach USA does.

Safety excellence results from leadership skills, gathering information, observing employees, making good decisions and motivating people. The Safety Leadership course is all about safety and what our managers can do to achieve superior safety results. Safety is a vital dimension of our business performance and our managers are our frontline of defense. We have included a copy of our Safety Leadership Training manual in the **Attachments** section of this Technical Proposal. This document is proprietary and should be held CONFIDENTIAL.

Safety Program

The foundation of our commitment to safety is embodied in our comprehensive Safety Program. At Coach USA, we are focused and dedicated to a “safety first, last, and always” attitude as an essential element for all our employees. Our goal is to provide safe, reliable, courteous, and efficient passenger transportation services.

Through a comprehensive training program for all Coach USA employees, we follow rigorous safety procedures in everything we do. We support and follow all federal, state, and local regulations regarding passenger transportation.

Coach USA requires a safe working environment and if our policies and procedures are not followed, we enforce them and re-train an employee if necessary. A safe working environment is the right thing to do as a company. Coach USA has invested significant resources in training, employee development, incentive programs, and developing annual safety audits to ensure that we are accountable for our performance.

Coach USA does not just talk about safety, we live it every day, at every level. From the CEO down to the drivers, safety is our number one priority. This is evident by the consistent “Satisfactory” ratings from the Federal Motor Carrier Safety Administration (FMCSA) after triennial reviews conducted at WCL. A “Satisfactory” rating is the highest possible rating available. Please see the most recent WCL Satisfactory safety rating to the right, dated January 7, 2022.

 U.S. Department of Transportation 1200 New Jersey Ave. S.E. Washington, D.C. 20590 Federal Motor Carrier Safety Administration	January 7, 2022 In reply refer to: USDOT Number: 46567 Review No.: 1846045/CR
Review No.: 1846045/ WISCONSIN COACH LINES INC 1520 ARCADIAN AVE WAUKESHA WI 53186-1433	
Dear THOMAS DIECKELMAN: The motor carrier safety rating for your company is:	SATISFACTORY
This SATISFACTORY rating is the result of a review and evaluation of your safety fitness completed on January 6, 2022. A SATISFACTORY rating indicates that your company has adequate safety management controls in place to meet the safety fitness standard prescribed in 49 C.F.R. 385.5.	
Please assure yourself that any specific deficiencies identified in the review report have been corrected. We appreciate your efforts toward promoting motor carrier safety throughout your company. If you have questions or require further information please contact:	
U.S. DEPARTMENT OF TRANSPORTATION FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION 1 POINT PL. STE 101 MADISON, WI 53719-2809 Telephone No.: 608-662-2010	
Sincerely,  Joseph P. DeLorenzo Director, Office of Enforcement and Compliance	

System Safety Program

Coach USA realizes the importance of safety and proper training at every level of operations. To ensure the highest level of safety, we have developed a comprehensive System Safety Program that is implemented at each of our operating locations. This program is administered by the local safety and training manager.

The System Safety Program consists of a collection of safety policies that address the management of the safety program and covers topics necessary to initiate and maintain effective safety practices. The information in this program includes descriptions of the vehicles, a thorough staffing plan, as well as state and local regulations governing the specific services offered by that location. The System Safety Program also contains all the documentation needed to maintain the effective administration of the program. This includes coverage of issues such as safety and maintenance inspections, emergency plans and procedures, and recordkeeping.

The policies included in this program include, but are not limited to:

- Drug and Alcohol Testing
- Blood Borne Pathogens
- Altering Equipment
- Backing
- Battery Safety
- Cell/Mobile Phone policy
- Compressed Gas Safety
- OSHA
- Speeding
- Personal Protective Equipment

The key activities associated with the program include:

- **Implementation and Customization:** The on-site management team works together to establish and maintain an effective program that includes employee participation and continuous ongoing training.
- **Periodic Audits:** Safety staff will perform monthly and annual safety audits. Each functional area of the operation is examined to ensure safe operation, determine current compliance levels, and identify areas for improvement.
- **Home office Support:** Every audit will be extensively documented and reports are provided to the project management team and the Coach USA home office support staff. Training and other safety initiatives are developed to address the results of the audits.

We have provided a sample copy of our Safety Audit in the **Attachments** section of this Technical Proposal. This document is proprietary and should be held CONFIDENTIAL.

Handling Emergency Situations

Emergency Preparedness Training

A key element of our training program for drivers is emergency preparation. An emergency can occur at any time, and we provide our drivers with the tools they need to handle situations including accidents and incidents, hazardous materials, passenger confrontations, and weather emergencies. Coach USA will spend classroom time on this critical area and reinforce these concepts during behind the wheel training and in practical simulations of various emergencies.

Security Procedures

Coach USA maintains the following policies and procedures for critical incidents:

- **Violence onboard:** The driver is to protect themselves and passengers on-board, then immediately contact dispatch through two-way communications. Coach USA dispatch immediately contacts local law enforcement to describe the event and request assistance when necessary.
- **Violence directed towards a vehicle in service:** Whether a weapon is discharged, or an object is thrown at the vehicle, the driver is trained to immediately move the vehicle out of harm's way and contact dispatch through the above procedures.
- **Bomb threats:** Threats onboard, either called into dispatch or received through other communications means, will be immediately reported to the local law enforcement, and our general manager will be notified. Threats, whether genuine or not, will be taken seriously and the appropriate response, as per the local police, will be implemented.
- **Suspicious packages:** We are keenly aware of the need to be vigilant and observant of packages brought onboard. If there is a package left, and the owner is not identified immediately, the driver shall contact dispatch, who in turn will contact local law enforcement for related action. While this may seem like an overabundance of caution in most cases, we believe safety and caution is always the best procedure.
- **Facility fire:** All employees will be evacuated to a designated area outside of the threat zone. If the fire is in our dispatch area, cellular telephone notification will be implemented by the senior staff member.
- **Medical emergency onboard:** Driver will immediately contact dispatch, and dispatch will contact 911 with a description of the onboard medical emergency and location of the vehicle. Dispatch will stand by until assistance is on the scene.

Each planning process has taken into consideration the delicate balance between operational safety, passenger needs, the safe operation of our system and the overall safety of our employees who provide the service. At each location, customized emergency procedures will be developed that are specific to the service and facility.

Accident and Incident Reporting

Passenger and driver safety is Coach USA's number one priority. In the case of an accident, Coach USA will immediately dispatch emergency medical personnel and law enforcement, as required. Our next

priority will be to provide any passengers that are on-board with immediate transportation upon collection of necessary contact and witness information.

We will utilize our supervisor and management personnel to immediately respond and guide the passengers in the safest manner possible to the replacement vehicle. It is our goal that there be a minimal impact on the level of service.

Coach USA has developed and implemented a comprehensive accident and incident reporting system. Our supervisors and managers have all been trained in accident investigation procedures. In the event that a Coach USA operated vehicle is involved in an accident a supervisor or manager will be dispatched to the scene, depending upon severity and according to contract requirements. At this time, the appropriate notifications are immediately made to the dispatchers and Management Team. Supervisors and drivers are equipped with the necessary paperwork and accident reporting forms, courtesy cards as well as a digital camera or smart phone. They will work with the law enforcement on scene to obtain all information and take photographs of the accident scene and vehicles involved. As per DOT requirements, the driver may be subject to post accident drug and alcohol test, as required by contract.

Electronic and hard copies of the accident/ incident report are kept by date with a reference to the vehicle driver number and an internal code designating the type of accident. Files include:

- Driver's report of accident/incident
- Standard investigation report and photos
- Supervisor's report with Drug and Alcohol Addendum
- Police report, if applicable
- Documentation of repairs performed as a result of an accident
- Documentation of any actions taken against drivers
- Correspondence information concerning the accident or incident with our insurance carrier or others involved

Coach USA is proud of its accomplishments in deploying all available technologies and innovative approaches to accident prevention.

Accident Safety Records Management

The safety and training manager is responsible for collecting and submitting required reports, including accidents, incidents, driver training, and employee development activities. The safety and training manager will also be responsible for submitting information required for safety awards based on Coach USA's Safety Award program.

Data collection requirements are based upon industry wide standards. Data is confidential. Information will be shared companywide through a summary report generated by each operating location that will be sent out at the end of each quarter.

We will document the safety, accident and incidents of the operating locations and communicate it internally to staff and externally to the contracting organizations. This enables us to analyze trends and ensure correct execution of safety procedures and thus the achievement of the Coach USA's safety objectives.

Storage and Handling of Hazardous Substances

Storage and handling of hazardous substances is an area of risk that requires that controls be in place. All Coach USA properties, including maintenance facilities and office spaces, include plans for the storage and handling of hazardous materials. We have a full understanding of the codes and regulations regarding hazardous substances, including solids, liquids, gases, fumes, and dusts that could cause harm to people or property. These substances could be flammable, explosive, corrosive, toxic or otherwise harmful. Examples of hazardous substances that may be found in our premises includes; but is not limited to:

- Fuel
- Oil and other lubricants
- Some cleaning products (bleach, toilet cleaner, polishes)
- Dirty water (for example in pits and drains)
- Paints and varnishes
- Fumes from engines
- Fumes from welding

The following principles for storage and use of hazardous substances must be followed in all premises:

- Identify hazardous substances
- Identify the tasks that are carried out and how employees might be exposed to hazards from these substances
- Reduce potential exposure
- Require Personal Protective Equipment at all times

Substance Abuse Policies and Programs

Coach USA is committed to providing a safe work environment that is free from the effects of drugs and alcohol so that it may operate and maintain transportation systems that are safe and efficient for our passengers, clients, employees, and the general public. Coach USA has a policy that prohibits the unlawful manufacture, distribution, dispensing, possession or use of a controlled substance or alcohol in the workplace or while on duty. In accordance with FTA guidelines, Coach USA performs pre-employment, random, post-accident, and reasonable suspicion drug and alcohol tests.

The purpose of this policy is deterrence, through establishing guidelines to aid in maintaining a drug and alcohol-free workplace. This will reduce the probability of accidents or incidents related to the use of drugs and misuse of alcohol by our employees, allowing Coach USA to guarantee our service is delivered safely and efficiently. Coach USA is dedicated to assuring the fair and equitable application of the substance abuse policy. Managers and supervisors are required to use and apply all aspects of this policy in an unbiased and impartial manner. Any manager or supervisor who knowingly disregards the requirements of this policy or who is found to be deliberately misusing this policy in regards to subordinates will be subject to stern disciplinary action.

As a condition of employment, all employees must comply with the terms of this policy. Failure to do so will result in termination of employment.

We have provided a copy of our Drug and Alcohol Testing Policy in the **Attachments** section of this Technical Proposal. This document is proprietary and should be held CONFIDENTIAL.



Proposed Technology Solution for the City of Racine

The transportation industry is constantly evolving – Coach USA understands the value of innovative technology in keeping pace with this growth. We have embraced emerging technologies in an effort to improve our operations, safety, maintenance, record keeping, and passenger experience. As a leader in ground transportation in the U.S., we recognize industry trends and understand how technology serves them, including Mobility-as-a-Service, Intelligent Transportation Systems (ITS), Demand-Response Transit (DRT), and Microtransit.

Coach USA is well-positioned to provide the technology for the City's commuter services; we are prepared to be responsible for ongoing project supervision. As the current provider of the City's commuter services, we would like to propose to pilot our established ticketing technologies in a new contract with WCL. Voyavation, Coach USA's proprietary technology solution, can provide an additional avenue for customers to purchase tickets for the KRM commuter service.

Coach USA has assembled an elite home office IT department which will provide oversight and assistance to the local team related to technology offerings. The department is guided by the principles of operational excellence, ensuring that run and build functions are reliable and predictable. The team includes experts in business analysis, BI reporting, cloud infrastructure, agile development methodologies and quality assurance. Coach USA also maintains a formal Project Management Office (PMO) to ensure the successful and organized delivery of projects.

Voyavation™: Coach USA's Technology Solution

Voyavation™ is a comprehensive and evolving cloud computing transportation platform provided by Coach USA. It provides a mix of infrastructure as a service (IaaS), platform as a service (PaaS) and packaged software as a service (SaaS) offerings. We have the unique ability to customize Voyavation™ to the needs of our clients, and also to integrate with client-provided technologies.

The logo for Voyavation, featuring the word "VOYAVATION" in a bold, blue, sans-serif font with a trademark symbol (™) to the right.

Passengers for the City's KRM commuter services currently have two options for ticketing. First, they have the option to purchase ten-ride ticket books at staffed ticket agents, accepting cash and credit cards. The only other option is to provide exact change in cash when getting on the bus. The gravity fareboxes on the fleet do not register a fare and cannot offer change.

We would like to propose an updated alternative for a new contract: the Coach USA Voyavation digital ticketing system. This system can provide a convenient option for passengers to purchase tickets on the mobile-friendly coachusa.com website or Coach USA app available for Android and iOS devices. Riders can purchase tickets with a credit card then open a digital ticket that is easily scanned when boarding the bus, eliminating the need to carry cash. However, passengers on the City's service will always have the option to pay cash when boarding the bus.

The proposed team will deploy a transportation system that is convenient and able to address safety, mobility, and environmental impacts, which will deliver greater livability to the wider community.

Implementation Timeline

Bus schedules for the Coach USA KRM Commuter Bus Service will continue to be displayed on the coachusa.com website and Coach USA app at the start of the new contract period in July 2022. With the City of Racine's approval, we would begin pilot testing digital one-way adult and ten-ride tickets on our Voyavation platform for the KRM Commuter Bus Service by the end of 2022 at which time a purchasing option would appear alongside the KRM Commuter Bus Service schedules on the coachusa.com website and Coach USA app.

Saucon Telemetry Delivery System (TDS)

The Saucon TDS solution supports a variety of GPS capabilities including graphical mapping, vehicle tracking, scheduling, and full operational reporting.



Using this solution, Coach USA can view a map that automatically refreshes and displays all active vehicles, vehicle speed, location, and date and time of last report. The system is fully integrated for interface with Google Earth and all associated functionality.

The Saucon TDS solution has the ability to define geo-zone fencing definitions to identify specific stops, zones or locations, as needed. Using these definitions with the embedded route-drawing functionality provides the ability to clearly define all routes, stops, and specific locations of interest.

The system also provides numerous services, feeds, and analytics that Coach USA can access through a secure web-based portal. This enables us to easily define rules, monitor vehicle performance, and report deviations using alerts and alarms.

Saucon TDS also allows us to conduct remote vehicle diagnostics for engine performance, speed, route compliance, hard stops, excess idling, and erratic driving. When combined with the Saucon on-board video system, we can receive an alert when the vehicle is off its planned route and do a live look-in on the vehicle and driver, and immediately take action.

Driving Behavior Platform

Coach USA has implemented a safety system that we have across the entire Coach USA fleet. This driving behavior platform monitors our drivers' habits and modifies their behavior by providing immediate feedback to the driver in the vehicle based on sensors on the bus.

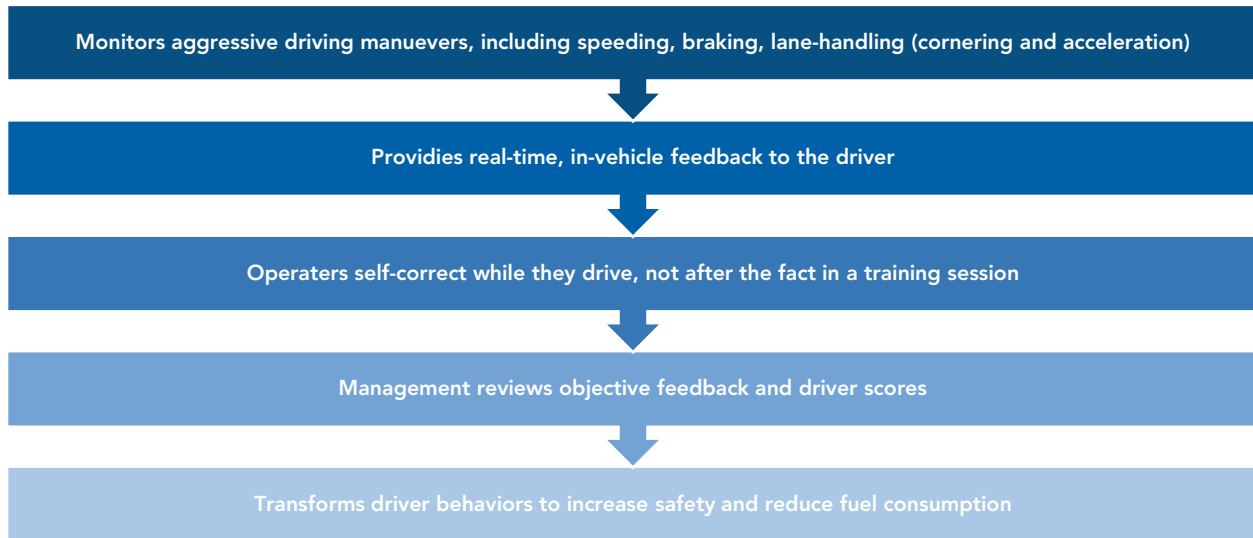
Using patented algorithms and a small in-vehicle device, this system analyzes maneuvers that impact risk and fuel consumption. Risky events get translated into a single, simple metric – the Safety Score. This information is communicated to the driver real time by lighted indicators that indicate 3 levels of alert encouraging



instantaneous behavior modification for sustainably safer and more eco-friendly driving habits. Our drivers receive daily updates on their scores and are incentivized as part of this implementation to ensure we achieve a successful collaborative approach.

The Process

This platform addresses the root cause of poor safety and costly driving habits through the following steps:



In addition to enhanced safety while driving, customers also enjoy sustainable cost savings from safer more fuel-efficient fleets. Throughout the day, this system sends real-time driving data for all vehicles by cellular network to Coach USA's private website. This provides enhanced fleet visibility demonstrating where they are, where they're headed, risky events, and idling status. As the data and history grows, repeat offenders can be identified and coached to correct behavior. Additionally, geographic locations with regular risky alerts can be identified so all drivers that travel through that location can be cautioned to take extra care. This location specific data will be particularly helpful training new drivers of any specific hazards on a given route.

Program Success

Coach USA implemented this system five years ago and immediately saw a steep reduction in accidents over a multi-year period.

Samba Safety

SambaSafety is an online tool that allows us to perform Motor Vehicle Record (MVR) checks on our drivers on a continuous basis. This allows Coach USA to ensure that our drivers are always qualified, and safe to operate our vehicles and transport our passengers.

Vehicle Maintenance Program

Overview

A successful transportation operation is always supported by a robust vehicle maintenance program. A well-maintained fleet is essential for the City and ensuring the safety of our employees and the customer we serve together.

At the heart of our maintenance program are skilled, qualified technicians. All Coach USA technicians are qualified to maintain all major systems, such as: engines, transmissions, brakes, air conditioning systems, electrical systems, and more. We offer continuous training and certification opportunities to our technicians to ensure they have the most up-to-date knowledge about the maintenance and repair of the Coach USA fleet used to carry out these services for the City.

The maintenance department is available 24 hours a day, seven days a week. In addition, our maintenance management team have mobile phones and are on call 24 hours a day. Coach USA's maintenance department is thoroughly prepared to provide maintenance services with state-of-the-art diagnostic and repair equipment to manage your fleet.



Preventive Maintenance (PM) Program Outline and Philosophy

Coach USA prides itself in our preventive maintenance program, which plays a vital role in the City's operation.

Our comprehensive PM program for the City's commuter services operation will:

Ensure the highest level of safety

Maximize the efficiency and reliability of the fleet

Reduce labor and parts expense

Extend the life of the fleet

Establishing PM Requirements

We maintain a close relationship with our vehicle original equipment manufacturers (OEMs) and rely heavily on their maintenance recommendations when creating PM programs for our clients. We tailor our PM program to each class of vehicle, ensuring that all OEM requirements are met. Coach USA also partners with federal, state, and local governments to make sure we remain compliant with all laws and

regulations. Coach USA's PM program is flexible and constantly improving; we frequently adjust each of our individual programs to meet the guidelines and/or requirements of FTA and the City.

PM Program: The Foundation of Vehicle Maintenance

Coach USA's PM program relies on thorough vehicle inspections, followed up with timely repairs of any identified defects. In developing our PM Program, Coach USA considers the type and age of the vehicles, the characteristics of the service demands, as well as exterior factors (e.g., local weather and road conditions). The overall goal of the program is to ensure safety, reduce service interruptions, extend the life of the equipment, lower annual maintenance costs, and provide thorough and accurate record keeping.

A 10,000-mile (or after 90 days, whichever comes first) PM inspection is performed to ensure we have the vehicles in the maintenance shop frequently to identify and remedy potential defects and/or system failures. Other scheduled services are performed according to component lifecycle or intervals determined by the vehicle manufacturer.

Pre-Trip and Post-Trip Inspections

A cornerstone of our program is the requirement that our drivers perform thorough pre-trip and post-trip vehicle inspections. Each driver thoroughly inspects the vehicle prior to beginning each day's assignment, and upon return of the vehicle to the depot at the end of their shift. The driver will check the wheels, look for leaks, HVAC operation, lights, body damage, and tire condition, among others.

Drivers use a Driver Vehicle Inspection Report (DVIR), identifying defects for safety and non-safety concerns. If a safety-related defect is discovered, the vehicle is either repaired prior to beginning service or replaced with an alternate vehicle. Non-safety related defects are also repaired in a timely fashion. Mechanical problems are diagnosed and repaired before they result in a breakdown and/or service interruption.

Maintenance Recordkeeping and Reporting: AssetWorks FleetFocus

Proper maintenance planning ensures that vehicles are ready to meet the City's requirements and that maintenance personnel perform at their peak efficiency. Maintenance files are maintained electronically through FleetFocus, an AssetWorks maintenance software company.



The system tracks all work performed on all vehicles, scheduled and unscheduled jobs, warranty, and preventive maintenance inspections. FleetFocus provides vehicle information at our management teams' fingertips. This allows our maintenance managers, supervisors, and technicians the ability to track work in progress as well as research vehicle repair history.

FleetFocus also tracks maintenance expense through the technician's repair hours, detail of work and parts usage. This information provides efficient preventative maintenance scheduling, minimizes inventory levels, and enables short-term and long-term planning.

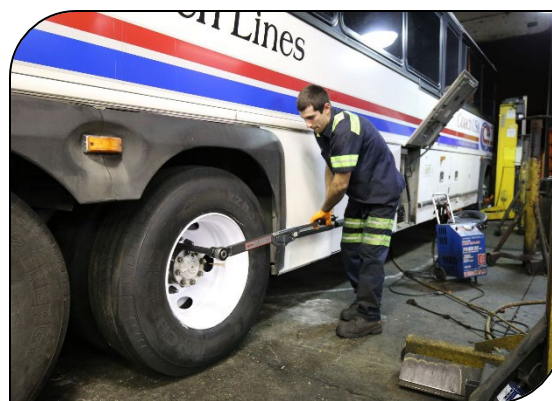
Coach USA has been qualified by vehicle and component manufacturers to perform warranty repairs on many of the systems on the fleet, thus reducing down time.

Technician Training

Coach USA is dedicated to the development of all of our employees, including our technicians. We work with our manufacturer partners to arrange motor coach-specific training for our technicians. In addition, we have internal Coach USA technician training programs to ensure the delivery of industry-leading vehicle maintenance and repair.

Preventive Maintenance Program

The Preventative Maintenance (PM) Program is the foundation of our maintenance success at Coach USA. The PM Program consists of a comprehensive inspection that includes all vehicle systems and all safety functions, including wheelchair lift operation and maintenance, performed every 90 days or 10,000 miles, whichever comes first. Scheduled inspections and scheduled repairs are another segment of our program. Our PM intervals are driven by either mileage, days, or both, and are tracked in FleetFocus. Vehicles assigned to a mileage-based PM cycle will default to a time-based schedule if time exceeds mileage.



PM Schedules and Inspections

The maintenance manager generates a daily PM list from FleetFocus. This report is created manually from their work management portal or via a scheduled daily e-mail. The system tells the manager which vehicles are due for inspection, based on either mileage or time intervals.

FleetFocus informs the maintenance manager when other systems need to be inspected at greater intervals. For example, transmissions undergo a thorough inspection and service every 60,000 miles.

PM Type	Service Interval
A	Every 3 months or 6,000 miles (whichever occurs first)
B	Every 6 months or 12,000 miles (whichever occurs first)
C	Every 12 months or 24,000miles (whichever occurs first)

PM tasks examples include:

- Inspect all safety equipment, devices and functions, including: seatbelts, emergency exits, egress windows, and all DOT required markings
- Inspect brakes and complete a brake performance test
- Inspect all vehicle systems, including: HVAC, Electrical, Air Systems, Wheelchair lift, Audio/Video, lights, horn, wipers and all other components
- Inspect exterior, including: bumpers, body panels, doors (function and appearance)

- Inspect tires and wheels, including: condition, tire pressure and thread depth
- Inspect engine compartment, including: checking for fluid leaks, condition of hoses, belts, wiring
- Check fluids, including: condition and levels
- Inspect and test engine cooling system, including: pressure test cooling system and check coolant protection levels.

We have provided a sample PM Checklist in the **Attachments** section of this Technical Proposal.

If any deficiencies are discovered during a PM inspection, a follow up work order is created and the repairs are completed before the vehicle is dispatched for revenue service. Scheduled services with specific intervals are in place for critical components, for example: changing filters, servicing air dryers, and inspecting air systems.

State of Wisconsin Inspections

In addition to the above inspections, many of our vehicles are required to undergo a State vehicle safety inspection. All commercial vehicles must have an annual Federal Highway Administration (FHWA) Safety Inspection or approved State periodic inspection performed, as required. The WCL maintenance department is trained and authorized to complete these inspections on-site.

Below are some additional examples of scheduled services performed as part of our preventive maintenance program:

- Oil and oil filter service (oil samples taken at each interval)
- Fuel Filter
- After treatment injector service
- Crankcase vent filter replacement
- Diesel exhaust fluid filter replacement
- Diesel particulate filter service
- Transmission fluid/filter change
- Differential fluid change
- Unitized wheel bearing inspection
- Air dryer service
- Wheel chair lift inspection
- Coolant heater inspection/service
- Fire suppression inspection/service
- HVAC service
- 90 day window/emergency exit inspection

Pre-Trip and Post-Trip Inspections

The entire Coach USA team supports the maintenance program, from the drivers to our technicians. Coach USA requires that every driver complete a pre-trip inspection at the beginning of their shift and a post-trip

inspection at the end of the shift. The pre-trip inspection is completed by the driver after visual and physical inspection of the vehicle. The inspection checklist has approximately sixty (60) items relating to all relevant safety and operational guidelines and safety regulations. The checklist also ensures the vehicle meets Coach USA standards for appearance and cleanliness. Pre-Trip inspections help to identify reliability issues such as fluid leaks or engine issues, for example. The inspection can be vehicle model specific and can include tests of on-board systems where needed.

Driver Vehicle Inspection Report

The Driver Vehicle Inspection Report (DVIR) was developed by Coach USA to ensure that all vehicles are safe and reliable before being dispatched. Each vehicle in the fleet has a corresponding DVIR book and all DVIRs are filed and retained for that vehicle according to DOT requirements.

The WCL dispatch office holds and maintains the fleet DVIR books anytime the vehicle is at the facility. At the start of a shift, the vehicle driver reports to the dispatch office, takes the corresponding DVIR book, and completes the pre-trip inspection.

If any defects that limit the safe and reliable operation of the vehicle are identified during the pre-trip inspection, they are either addressed before the vehicle leaves the facility or the dispatcher assigns a different vehicle to the shift. At the end of the shift, the driver completes the post-trip inspection, fills out the DVIR, and returns the DVIR book to dispatch.

DVIR Review

The dispatcher reviews all returned DVIR reports. If the vehicle requires maintenance attention, the dispatcher will alert the maintenance team. If necessary, the vehicle will be taken out of service until the issue has been resolved. We have included a sample of the WCL DVIR report below.

DRIVER'S VEHICLE INSPECTION REPORT WISCONSIN COACH LINES, INC.																
Bus No.:		Starting Miles:			Ending Miles:			Total Miles:								
Print Drivers Name:							ID.#									
Check Defects Only - Explain Defects in Comments Section <small>(Gray Item may indicate safety concern)</small>												Pre-Trip Inspection Completed				
Defect	Fixed		Defect	Fixed		Defect	Fixed		DATE:	TIME:						
	Checked			Checked			Checked						AM	PM		
001-000			030-000			071-503			* SECURITY CHECK * Inspect all items listed below during pre-trip. Mark each item as checked. Toilet/Restroom not tampered with No package/baggage left on bus or in baggage bays Underside & top of bus clear of any suspicious items No suspicious substance or other item detected on bus Wheel-wells & other compartments clear of suspicious items Driver area/controls not tampered with							
011-000			031-000			071-504										
012-000			032-000			079-000										
013-000			032-001			079-000										
013-000			033-000			079-500										
013-003			034-000			052-000										
013-009			042-000			052-003										
014-000			042-501			052-004										
015-000			043-000			052-007										
016-000			044-000			052-500										
017-000			045-000			090-000										
018-000			045-000			090-504										
018-000			050-502			071-000										
022-000			071-500			071-000										
024-000			071-501			071-000										
027-000			071-501			071-000										
030-000			071-501			Other										
Post Trip Driver Comments:				Fixed	Checked	Mechanics Comments:										
1				Fixed	Checked	1										
2				Fixed	Checked	2										
3				Fixed	Checked	3										
4				Fixed	Checked	4										
5				Fixed	Checked	5										
6				Fixed	Checked	6										
7				Fixed	Checked	7										
SIGN OFF - FIRST DRIVER SIGNATURE:				I DID have an Accident Today				DATE:	TIME:	AM	PM					
				I DID NOT have an Accident Today				DATE:	TIME:	AM	PM					
MECHANICS SIGNATURE:								DATE:	TIME:	AM	PM					
SIGN ON - REVIEWING DRIVER:								DATE:	TIME:	AM	PM					
SIGNATURE:								DATE:	TIME:	AM	PM					



HVAC Service and Training

HVAC filters and basic items are inspected on every PM. All staff that handles refrigerant has the proper certification. Technicians that perform HVAC inspections and system repairs have been trained and follow up training is performed as required.

Brake Inspections

Brakes are inspected and tested during every Preventive Maintenance Inspection and upon completion of every brake related repair. During the inspections, the maintenance team will inspect all brake components individually. Brake thickness is measured and brakes with less than 4/32" of brake material are replaced. All brake work performed and parts used are documented and records are retained in the FleetFocus maintenance system. Upon completion of any brake related repair the vehicle is road tested to ensure it is in safe operating order and then returned to service.

Tire Service

Coach USA requires tire inspections on all DVIR's and PMI's. Tires are a focal point of both Safety and Maintenance programs. Coach USA's Tire Policy was created to meet and exceed federal guidelines; for example, our full-size coaches require removal of steer tires at 10/32" and drive and tag axle tires are removed at 4/32". Tire tread depths are checked with a tread depth gauge at every Inspection and tread depths are recorded on the preventive maintenance inspection sheet. Tires are also inspected daily by the vehicle drivers.

Wheelchair Lift Inspections

Coach USA drivers cycle wheelchair lifts daily during the pre-trip inspection. These inspections are important in ensuring the safety of the passengers. The maintenance team periodically attends on-site training with the wheelchair lift manufacturers as needed to assure they are knowledgeable on the function of the lift components. In addition, Coach USA utilizes the manufacturers' checklist of inspection items during a wheelchair lift inspection. Technicians also utilize this checklist during all Preventive Maintenance Inspections.

Regular Maintenance Services

Based upon our experience, Coach USA has developed a number of scheduled maintenance modules. For example, we thoroughly inspect and service the air conditioning systems every spring to prepare for the summer months. Similarly, we inspect and service heating systems and make other preparations each autumn in advance of the winter season. We schedule these types of maintenance services to prepare in advance for expected conditions.

Unscheduled Maintenance and Repair

Unscheduled maintenance and repairs are a result of unforeseen mechanical problems that develop over the course of the day. In addition to regularly scheduled preventive maintenance, Coach USA is prepared to perform all "unscheduled" maintenance and running repairs that may be necessary. Our maintenance department is open staffed during all operating hours, with additional staff during peak periods.

When unscheduled maintenance or repairs are necessary, the WCL maintenance team, keeping safety as our top priority, chooses one of two courses of action, depending on the situation:

- WCL dispatches an extra driver or mechanic with a backup bus or vehicle, replacing the vehicle that requires repair and returning to the WCL maintenance facility. If possible, the vehicle transfer should take place at layover or transfer points to refrain from inconveniencing passengers.
- If the necessary repair can be completed onsite, the WCL dispatches a technician with a service truck to the location of the bus/ vehicle to complete the repair onsite. Again, when possible, these running repairs are completed at the end of the line or at layover points to minimize trip interruption.

Unscheduled maintenance and repairs also arise at the end-of-the-day fleet check process and the technician review of pre-trip and post-trip inspection reports. As each vehicle is brought back to the lot and placed in the service line, the DVIR is reviewed. After the technician reviews the vehicle, it is either parked for service the following day or is taken out of service until the defects are corrected.

Major Repairs and Warranty Work

The WCL maintenance department is fully equipped to perform most repairs. However, major body and paint requirements are either sent to one of our Coach USA body repair centers or in some cases Coach USA will subcontract body repairs and paint work to a qualified vendor. The same process is also in place for rebuilding of transmissions and engines. Coach USA has agreements in place with the engine and transmission manufacturers to have an engine and/or transmission ready if needed.

Coach USA has an extensive warranty process in place to capture all warranty and labor to help reduce the cost of running the vehicle through the FleetFocus Maintenance Software program. All warranty claims are audited by the maintenance manager or warranty manager to ensure the maximum dollar amount is recovered. Coach USA developed a detailed Warranty Manual and provides hands on warranty training to new personnel. Coach USA also has a very good working relationship with the manufacturers.

Road Service and Towing

Most Coach USA maintenance locations have a fully equipped service truck with a supply of tools, equipment, fluids, parts, etc. at its disposal to respond to on-road vehicle servicing and breakdowns when needed. Minor repairs, including tire services, are performed remotely rather than driving or towing the affected vehicle back to the garage.

Sometimes it is necessary to replace an in-service vehicle due to a mechanical issue. In the event that a vehicle has a road failure, Coach USA will work to resolve the issue as quickly as possible with the goal of reducing passenger inconvenience, delays in service, and or vehicle down time. Upon notification by the driver to our dispatcher we will gather pertinent information such as:

- Is the vehicle in a safe place?
- Have you deployed any warning triangles?
- Description of problem.
- Current location.
- Any passengers on-board?
- Can the vehicle be safely moved?
- Are there any special passenger needs?

- Next pick-up time and location.
- What corrective action attempts have been made?

Once the appropriate information is obtained, the dispatcher will determine the best course of action to resolve the problem. Options include but are not limited to the following:

- Dispatch relief vehicle
- Contact Dispatch
- Contact maintenance staff and dispatch a technician in service truck
- Call for a tow truck
- Transfer passengers to another vehicle

Depending on the situation, dispatch may initiate multiple rescue and repair actions simultaneously.

Towing services are typically subcontracted to a local, full-service towing company. Each vendor's service is monitored with regard to consistently quick response times, professionalism, safety and cost.

Upon resolving the road failure, the dispatcher will prepare collected data and submit it to the management team and maintenance department. This information will be analyzed to determine if this was a preventable or non-preventable incident. Upon that determination, our maintenance department will take steps to ensure this road failure does not happen again.

Steps may include:

- Implementing a scheduled service to address the component failure
- Add the repair item to our inspection program
- Contact vehicle manufacturer for possible recall items
- Use a different parts manufacturer
- Create and distribute a Maintenance Advisory to all maintenance personnel
- Publish a "Tool Box Talk" made available to all technicians through Fleet Focus

Breakdowns are tracked on a daily shift report and reviewed by the maintenance manager. Breakdowns are also tracked on monthly KPI's and monitored by location, regional and home office staff.

All out of service equipment is logged on a daily report that is reviewed by the general manager. Every effort is made to get out-of-service equipment back in service as soon as possible.

SmarTire® Bus Tire Pressure Monitoring System (TPMS)

Coach USA identified improperly-inflated tires as a potentially costly and dangerous concern. Tire blow-outs and fires present a serious risk to vehicle and passenger safety and under-inflated tires reduce tire life and fuel economy while increasing the potential for vehicle downtime. In fact, most tire failures are a result of under-inflation, which is easily avoidable. Coach USA implemented the SmarTire Bus TPMS system on our fleet vehicles in order to address this concern.



SmarTire Bus is an active tire pressure and temperature monitoring system designed to simplify and automate a fleet's tire maintenance process resulting in an overall reduction of fleet operating costs. At the push of a button on the dash mounted display or wireless hand tool, the system provides accurate, real-time tire pressure and temperature information. With SmarTire Bus on-board, drivers on the road and maintenance personnel in the yard will be able to easily maintain accurate tire pressures for each vehicle in the fleet.

With the implementation of SmarTire Bus, you will enjoy the following benefits to your fleet:



Improved vehicle, passenger, and driver safety

Improved tire carcass life and tread life

Reduced maintenance costs & vehicle downtime

Improved fuel economy

Improved dual wheel assembly performance

Maintenance & Breakdown Reporting

Coach USA's fleet management software system is used to manage the assets assigned to the KRM Commuter Services contract. Our system records work orders, tracks employee labor, plans preventive maintenance, maintains parts inventory through suggested parts orders, and manages stockrooms.

Coach USA has established key performance indicators (KPIs) that measure elements that result in running a safe, dependable, clean, and timely service. The data we collect is continually assessed to identify successful operating methods and areas where improvements can be made.

Our maintenance staff reviews reliability data to identify trends that can be improved with preventive maintenance enhancements. Tracking and evaluating trends allows our team to take corrective action, which improve the safety of our fleet and overall financial performance.

Our maintenance objectives are as follows:

- **Missed Trips:** Coach USA's standard is simple – no missed trips resulting from mechanical failures. This requires policies and procedures to monitor service delays and, if necessary, replace vehicles so drivers can complete all trips on time.
- **Revenue Miles Between Roadcalls:** A roadcall is defined as any disruption of service caused by a mechanical malfunction, which results in the dispatch of a maintenance technician to correct,

repair, or replace the vehicle. Miles between roadcalls are maximized by conducting thorough driver inspections and quality preventive maintenance.

- **Major Repair Work:** Coach USA's scheduling standards require repairs to be completed as soon as possible.

Preventive Maintenance: All PM inspections are performed based on mileage and/or time

Maintenance administrative personnel prepare, enter, and analyze data to generate final reports.

Performance areas that are analyzed and managed include:

- Cost
- Fleet reliability
- PM performance
- Vehicles out-of-service
- Fuel management
- Warranty management
- Parts inventory

Coach USA maintains a wide variety of written records regarding the maintenance functions. At a minimum, the maintenance records include the following:

- Completed daily Pre-Trip and Post-Trip Inspection Forms
- Daily consumable records (fuel & fluids usage)
- Daily roadcall reports
- Master preventive maintenance schedules
- Tire program records
- Out of Service monitoring

Complete maintenance files on each vehicle including:

- All vehicle repair and PM history
- Warranty information
- Repair orders including parts, labor and detail of work performed
- Fluids usage including fuel, oil, antifreeze
- History of required state/federal inspections
- Completed safety audits

Coach USA prides itself on an extremely low rate of breakdowns of less than one-half of one percent. Our excellent service record is a result of our thorough and comprehensive vehicle maintenance program.

Parts, Fluids, and Tires

Coach USA maintains a parts inventory with the appropriate inventory levels for each service. Local parts distributors are utilized largely to avoid carrying excessive inventory. We maintain an inventory of hard-to-find parts.

To ensure Coach USA has the correct inventory in place, Coach USA uses the FleetFocus Maintenance Software program. With FleetFocus, Coach USA assigns a reorder point for all stock items and a reorder report is generated by FleetFocus to help the parts manager with forecasting. The report gives a thirty (30) day notice that the part(s) are needed and “safety stock” on high usage parts is built in. The reorder points for stock can be managed by the parts manager to help reduce or increase stock for seasonal type parts, special projects and/or internal campaigns to guarantee stock is on hand.



Coach USA has established national contracts with manufacturers and vendors that have agreed to carry the stock for Coach USA. Coach USA also has thirty-eight (38) maintenance locations to supply additional parts as needed.

Fluids and lubricants are purchased in bulk, as needed. The storage tanks are measured regularly and we establish replenishment schedules with suppliers. Limited supplies of fluids are also available on the shop truck. Our fluid storage and removal comply with EPA, state and local guidelines. In addition, we meet OSHA requirements regarding ventilation, lighting, etc., through our shop safety program.

We store and secure tires at the maintenance facility.

Parts Inventory and Purchasing Management

FleetFocus includes fully integrated parts inventory control and purchasing functionality for an unlimited number of user locations.

Users may:

- Manage the purchasing and stocking of parts locally
- View complete data for any part online from all locations.
- Track quantity and value on hand and on order for all parts
- Issue parts and relieve inventory through the same transaction
- Track vendor contracts, including amounts spent and remaining
- Receive automatic on-screen notification when the quantity on hand falls below reorder point
- Process an order, receipt, and issue of a part to a work order as a single transaction
- Automatically apply inventory counts to adjust current stock levels.

- Catalog an unlimited number of manufacturer and aftermarket supplier IDs and part numbers, and cross-reference those to stock parts and to each other
- Track information on parts and parts vendors (e.g., delivery lead-time, minimum order quantity and value, warranty terms, etc., for each vendor and part)
- Automatically identify parts which have been used on equipment no longer in use to reduce inventory on-hand
- Automatically assemble kits from kit component lists

Vehicle Cleaning



Vehicle cleanliness has always been a priority for Coach USA, even before the COVID-19 pandemic. Protecting public health is of the utmost importance. We will divide our full vehicle complement into a daily cleaning schedule. Forms will be used for documenting cleaning functions. We are committed to providing clean vehicles at all times.

Coach USA utilizes cleaning products that have been approved by the CDC to eliminate the COVID-19 virus, as well as flu and other bacteria. Our cleaning staff will be equipped with the proper personal protective equipment (PPE), including gloves and masks, to ensure that their health is protected while cleaning the vehicle.

The appearance of the vehicles develops a perception among passengers as well as the non-riding public, about the quality of the service provided. We understand this and will maintain the cleanliness of the vehicles to our highest ability.

Coach USA provides comprehensive interior and exterior cleaning for each revenue vehicle. We take tremendous pride in having the cleanest vehicles on the road. Our experience includes vehicle cleaning, detailing, and buffing. We will perform the following:

- **Daily cleaning of the interior of the vehicles:** Drivers will remove trash and wipe down the interior of the vehicle at the end of each service day. All foreign matter such as gum, grease, dirt, and graffiti will be removed from interior surfaces during the cleaning process and upholstery damage will be repaired immediately upon discovery.
- **Regular cleaning of the exterior of the vehicles:** Our cleaning staff will utilize a



power washer to hand wash exteriors and ensure all environmental regulations are met and followed at least once per week, or more with inclement weather, or based upon contract requirements.

- **Vehicles will be kept free of vermin and insects at all times:** We will contract for the extermination of all vermin and insects from all vehicles immediately upon their discovery, with a firm that uses safe, nonhazardous and EPA approved insecticides/materials.

All cleaning will be monitored and evaluated by our Operations Manager or supervisors each day to ensure our standards are maintained. Home office staff will also review the interior of each vehicle during their inspection and audit trips.

Fueling

As each vehicle completes the day's service, the driver will drop the vehicle in the designated parking space. Once the driver has completed their post-trip inspection and shut down, the fueler/cleaner will fuel each vehicle at the fuel island, check and replenish fluids, and run the vehicle through the vehicle wash. After return to the designated parking area, additional fuelers/cleaners will complete the interior cleaning as described in the cleaning section. Daily, the maintenance manager will monitor and record fuel and lubricant storage tank levels and report as required to the City.

Marketing Program

Throughout the 3-year contract, plus 2 option years, on-going marketing will take place. Please see the **Marketing Program** section of this proposal for details on the Coach USA marketing plan for a new contract with the City.

EQUIPMENT

Describe the equipment (buses) you will use to provide service under this contract. Proposals not including accessible intercity coaches will not be considered.

WCL is proposing the continued use of the Coach USA motor coach fleet that we currently use to operate the City's KRM commuter services. These buses meet all requirements outlined in the City's RFP: all of our motorcoaches are ADA accessible units, are in excellent working condition and meet FTA (Altoona) standards. They are also equipped with onboard lavatories for passenger convenience. In addition, each of our buses undergo a rigorous, annual safety inspection by the Wisconsin State Patrol.

The intercity passenger values the comfort and safety amenities provided on a motor coach, including those highlighted below:

Feature	Notes
All-season climate control	Passenger comfort
Insulated cabin	Reduces road noise and maintains comfortable cabin temperature
Improved air-ride suspension	Smoother ride for passenger comfort
Kneeling bus feature	Lowers the passenger entryway for safe and easy passenger loading and unloading, decreases slips, trips, and falls
Individual reclining cloth seats with head and footrests, seatbelts, and reading lights	Passenger comfort and safety
Ample storage space	Overhead storage for each passenger and lower-level compartments for luggage, bicycles, and other freight
On-board lavatories	Restrooms for passenger convenience
Exterior bus design	Easily recognizable exterior design painted and decaled in a uniform red, white, and blue color scheme

MARKETING PROGRAM

Describe elements of the marketing program and annual cost. Cost should be included in the cost per vehicle mile. Program should include signage and information for riders at major stops. Bus stop signs can be decals on other systems' signs, if permitted. They will be permitted in Racine. Signage must include Kenosha, Racine and Milwaukee as destinations and the new Racine transit brand. Route information must be available on Google maps. Vehicles must prominently indicate the Racine transit brand, but they don't have to be altered for the route and can still display the contractor's brand and colors.

Overview

Wisconsin Coach Lines is a growth-oriented, innovative company that has built a loyal ridership base on the City of Racine inter-city commuter service over time due to the marketing efforts already in place and looks to grow this base with the marketing efforts mentioned. The comprehensive marketing plan from Coach USA outlined in this section of our Proposal will allow WCL to continue expanding the City of Racine inter-city commuter service ridership while building on the name recognition and quality service we have been providing our customers since 1941. Coach USA has perfected our digital marketing process by running hundreds of travel-oriented advertising and public relations campaigns. We know our cohesive process works and we have the results to back it up.

Additional digital marketing opportunities will be available, should the City decide to adopt the online/mobile ticketing technology discussed in **Proposed Technology Solution** of the **Management Methodologies/ Procedures** section of this Proposal.

Goals

We understand that the funding for this service is fixed and will not change over the term of a new contract. Our primary goal is to increase ridership and awareness of the City of Racine Commuter Inter-city bus service on all routes by positioning Wisconsin Coach Lines as a high quality, economical, safe, reliable, stress-free way to get to work/school, etc.

Audience

Our marketing efforts target the entire southeastern Wisconsin community, broken down below:

- **Primary Audience:** Daily commuters, traditional and reverse commute
- **Secondary Audience:** College students including but not limited to, Carthage College, UW-Parkside, UWM and Marquette
- **Other:** General public

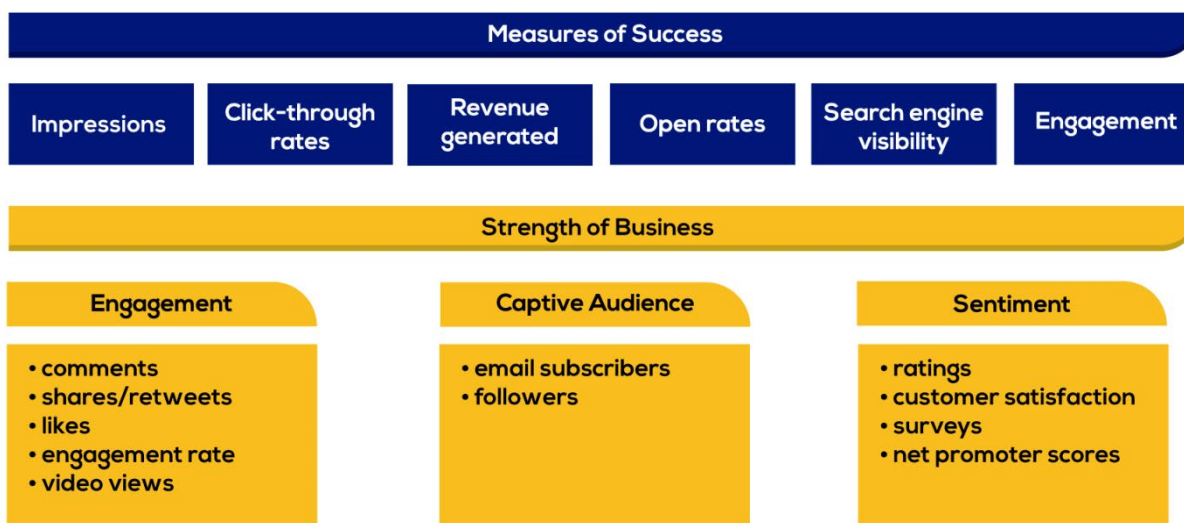
Marketing Tactics

Digital Marketing

We have vast accomplishments in creating content for paid, earned and owned channels and more importantly, we get results. Our goal is always to create campaigns that are trackable, testable, and scalable to maximize the return on your investment. We have built hundreds of digital marketing campaigns with a focus on increasing revenue and building positive engagement.

Our skillset includes but is not limited to:

- Search Engine Optimization for your website to increase organic Google listings
- Paid search engine advertising
- Targeted digital display advertising
- Website Customer Retargeting
- Search Retargeting
- Email Marketing
- Social Media Management
- Offline advertising & Media Buying
- Customer surveys
- In-house graphic design work
- Public Relations Outreach



We believe the key to success is constantly optimizing all digital campaigns and following the data. Building engagement and positive sentiment in tandem with targeted marketing campaigns allows us to both entice new customers while maintaining current customers and increasing the overall strength of your

business. We will look to begin with an advertising budget of \$1,000 per month but can scale up or down as demand warrants.

Customer Insights and Marketing

Creating an avenue for online sales makes all of the above channels a possibility. Once tickets are available for sale on the website, we'll also be able to better understand your customers' habits. We use a variety of tools to gather customer insights and better understand customer behavior. We have experience in using products such as Google Analytics and other website monitoring tools to identify potential pain points in the purchase flow or areas that need to be optimized on the website. We also use tracking pixels that provide insight as to how our customers interact with our advertising and what actions they take after they see our ads. Additionally, it is important to utilize social media platforms to interact with customers directly, build positive engagement with the brand in a public forum and monitor and improve customer sentiment. Finally, we have a wealth of experience in marketing research and surveying customers to gather sentiment and direct feedback. All of the data gleaned from these sources is aggregated and used to directly inform our ongoing digital marketing strategy.

Because we can accurately determine the exact return on investment for any digital campaign, we believe that digital marketing is not only the most cost-effective avenue, but it is also the quickest way to reach customers whenever they are searching for your service, no matter where they are located.

Signage

We will ensure that all applicable signage is in place at the stop and that it adheres to brand guidelines. All signage and decals will be created and produced in house with the goal of providing customers with clear, concise messaging to help find the stop, schedules and other service alerts with ease. We will promote Kenosha, Racine and Milwaukee as destinations, ensuring that the decals on the buses align correctly with the brand will be a key initiative. We will work in collaboration with the Belle Urban System (BUS) to maintain signage at shared stops.

We also have the ability to create a-frame signage, flyers, and handouts to distribute as needed at the stop level. As we transition to online sales, if that is determined by the City, we can include QR codes to scan on the signage so that customers have direct access to purchase tickets at the stop.

Partnerships

Whenever possible, we will look to team up with other providers and community organizations in an effort to increase the breadth of our marketing efforts. Some examples of possible partnerships include:

- Local colleges, civic groups
- Transfer program with MCTS and the Belle Urban System
- Possible inclusion in regional southeastern Wisconsin transit marketing group
- City of Racine in offering discounted or free ride days

Grass Roots Marketing

As a well-known entity in Wisconsin for the past 80 years, we have a wide array of local connections. We are prepared to build upon these to create additional buzz around the city of Racine. Some examples include:

- Involvement with various business organizations
- MMAC-Metropolitan Milwaukee Area Chamber of Commerce
- Attend/Initiate transit fairs at area businesses
- Transit fairs at local universities during orientation week and every semester.
- Extensive schedule distribution network

Cross Marketing

We have a built-in customer database for other services that we run throughout Wisconsin. As part of our normal operation, we promote all of the city's services to other routes and services operated out of the WCL facility, including:

- Coach USA Airport Express
- Megabus.com
- Coach USA Charters
- Coach USA Group Tours

AMERICANS WITH DISABILITIES ACT (ADA) SERVICE PROVISIONS

Describe and certify your compliance with applicable Federal Regulations for ADA requirements as outlined in 49 CFR 37, particularly address 49 CFR 37.163, 49 CFR 37.165, 49 CFR 37.167, 49 CFR 37.173.

<https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/part-37-transportationservices-individuals-disabilities>

As a part of Coach USA, Wisconsin Coach Lines is subject to all the regulations laid out by the Federal Transit Administration (FTA), including those regarding the Americans with Disabilities Act (ADA).

All Coach USA buses in the WCL fleet are 100 percent ADA compliant, including a wheelchair lift and capacity for two wheelchairs per bus. Our entire fleet is wheelchair accessible. We will continue to adhere to each of these laws and have addressed each section of the FTA regulations below.

Keeping Vehicle Lifts in Operative Condition: Public Entities

Wheelchair Lift Inspections are part of the daily inspection process, as well as all preventive maintenance activities at all Coach USA locations.

Driver Vehicle Inspection Report (DVIR): Pre- and Post-Trip Inspections

Coach USA drivers cycle wheelchair lifts daily during the pre-trip inspection. These inspections are important in ensuring the safety of the passengers. The maintenance team periodically attends on-site training with the wheelchair lift manufacturers as needed to assure they are knowledgeable on the function of the lift components. In addition, Coach USA utilizes the manufacturers' checklist of inspection items during a wheelchair lift inspection. Technicians also utilize this checklist during all Preventive Maintenance Inspections.



Preventive Maintenance Inspections

The PM Program consists of a comprehensive inspection that includes all vehicle systems and all safety functions, including wheelchair lift operation and maintenance, performed every 10,000 miles. Scheduled inspections and scheduled repairs are another segment of our program. Our PM intervals are driven by either mileage, days, or both, and are tracked in FleetFocus. Vehicles assigned to a mileage-based PM cycle will default to a time-based schedule if time exceeds mileage.

We have included more information about all motor coach inspections in the **Vehicle Maintenance Program** section, located in **Management Methodologies/ Procedures** of this Technical Proposal.

Lift Malfunction

In the event that a driver finds the wheelchair lift inoperable on the pre-trip inspection, that vehicle is immediately taken out of service and replaced with a backup bus. If the wheelchair lift should become

inoperable while in service, our drivers immediately report the issue to the terminal facility. We will ensure that alternate transportation is available for all passengers with disabilities immediately.

As part of our policies, WCL does not operate any routes without a fully functioning wheelchair lift and appropriate wheelchair tie down spaces on the bus.

Lift and Securement Use.

As part of the strict Coach USA training plan, our drivers are trained on ADA regulations during their classroom training, as well as use of the wheelchair lift and wheelchair securement during their behind-the-wheel (BTW) training.

We have included more information about all motor coach inspections in the **Training Program** section, located in **Management Methodologies/ Procedures** of this Technical Proposal.

Other Service Requirements.

As with all FTA regulations, Wisconsin Coach Lines will continue to adhere to the requirements outlined in Sec. 37.167. We strive to make public transit as accessible and convenient for all passengers, including those with disabilities. Our drivers are always available to assist passengers with entering or exiting the buses, clearing wheelchair-accessible spaces, securing wheelchairs, and providing any necessary transportation information to those passengers.

Training Requirements.

As mentioned above, all Coach USA drivers are trained on ADA regulations during their classroom training, as well as use of the wheelchair lift and wheelchair securement during their behind-the-wheel (BTW) training.

We have included more information about all motor coach inspections in the **Training Program** section, located in **Management Methodologies/ Procedures** of this Technical Proposal.

REQUIRED FORMS

To be considered for evaluation, each bidder must submit the following:

- *Signed Federal Contract Clause Acknowledgment, Page 23*
- *Signed/completed – All certifications & forms, Pages 24-33*
- *Copy of your equal employment opportunity policy*

We have included signed copies of the required forms listed above in the “other” section of the DemandStar procurement site.

In addition, we have included a copy of the Coach USA Equal Employment Opportunity Policy in the **Attachments** section of this proposal. This policy is proprietary and should be held CONFIDENTIAL.

ATTACHMENTS

Attachment 1

Certificate of Insurance

Attachment 2

Coach USA Training Materials

Training Program Syllabus

Training Program Table of Contents

Attachment 3

Coach USA Safety Leadership Training Manual

Attachment 4

Sample Coach USA Safety Audit

Attachment 5

Coach USA Drug & Alcohol Policy

Attachment 6

Sample Coach USA PM Checklist

Attachment 7

Coach USA Handbook

Note: The Coach USA Equal Employment Opportunity Policy can be found on page 8 of the Employee Handbook.

ATTACHMENT 1



CERTIFICATE OF LIABILITY INSURANCE

8/1/2022

DATE (MM/DD/YYYY)
4/5/2022

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).


PRODUCER	LOCKTON COMPANIES 3657 BRIARPARK DRIVE, SUITE 700 HOUSTON TX 77042 866-260-3538	CONTACT NAME:	
		PHONE (A/C, No, Ext):	FAX (A/C, No):
		E-MAIL ADDRESS:	
		INSURER(S) AFFORDING COVERAGE	
		INSURER A: Greenwich Insurance Company	NAIC # 22322
		INSURER B: XL Insurance America, Inc.	24554
		INSURER C: XL Specialty Insurance Company	37885
		INSURER D:	
		INSURER E:	
		INSURER F:	

COVERAGES CERTIFICATE NUMBER: 18398717 REVISION NUMBER: XXXXXXXX

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:	Y	N	RGD9437651-08	8/1/2021	8/1/2022	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 1,000,000 MED EXP (Any one person) \$ Excluded PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000
A	<input checked="" type="checkbox"/> AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY	Y	N	RAD943765208	8/1/2021	8/1/2022	COMBINED SINGLE LIMIT (Ea accident) \$ 5,000,000 BODILY INJURY (Per person) \$ XXXXXXXX BODILY INJURY (Per accident) \$ XXXXXXXX PROPERTY DAMAGE (Per accident) \$ XXXXXXXX
	<input type="checkbox"/> UMBRELLA LIAB <input type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED RETENTION \$			NOT APPLICABLE			EACH OCCURRENCE \$ XXXXXXXX AGGREGATE \$ XXXXXXXX
B B C	<input checked="" type="checkbox"/> WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N N	N/A	RWD9435412-09 AOS RWR9435413-09 WI Only RWE9435415-09 WY & OH	8/1/2021 8/1/2021 8/1/2021	8/1/2022 8/1/2022 8/1/2022	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
Additional insured in favor of City of Racine, its elected and appointed officials., officers, employees or authorized representatives or volunteers on all policies (except workers' compensation/el) where and to the extent required by written contract. All policies (except workers' compensation/el) contain a special endorsement with "primary and noncontributory" wording.

CERTIFICATE HOLDER 18398717 City of Racine 730 Washington Ave., Room 105 Racine WI 53403	CANCELLATION SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE 

ATTACHMENT 2

COACH USA NEW OPERATOR DEVELOPMENT SYLLABUS

WEEK ONE

DAY ONE 5.8 HOURS

CLS	60	Welcome to Coach USA Megabus
CLS	20	The Coach USA Professional
CLS	20	Sexual Harassment/Whistleblower
CLS	60	Drug & Alcohol
CLS	20	BBP
CLS	20	HazCom
CLS	120	Security Procedures*
CLS	30	ADA

DAY TWO 7.3 HOURS

CLS	30	CSA 2010
CLS	120	Emergency Procedures
CLS	30	Lifting Techniques
CLS	50	Fatigue Management
CLS	60	Pre-Trip, Post-Trip Inspections, Air Brakes
CLS	30	Customer Service
CLS	40	Safety & Risk
CLS	40	LLLC Defensive Driving
CLS	20	GreenRoad*
CLS	20	Seeing Machine*

DAY THREE 6.25 HOURS

CLS	30	Following Distance
CLS	30	Intersections
CLS	30	Changing Lanes, Merging and Passing
CLS	30	Backing
CLS	30	Pedestrian & Cyclist Awareness
CLS	30	Special Conditions/Adverse Weather
CLS	30	Mountain Driving
CLS	30	Vehicle Dynamics
CLS	30	Map Reading
CLS	15	GPS Review*
CLS	90	Fuel Efficient Driving Training*

DAY FOUR 6.5 HOURS

CLS	60	Federal Regulations & Hours of Service
CLS	30	Accident Reports and Logs
CLS	150	Hands-on Graph Exercises*
CLS	150	Logs Recapping*

WEEK ONE

DAY FIVE 4.42 HOURS

CLS	150	Electronic Logs*
CLS	45	Busing On the Lookout (BOTL)
CLS	60	Motorcoach Comprehensive Exam
CLS	10	Coach USA Policy - Vehicle Operators*

WEEK TWO

DAY SIX 8.0 HOURS

PDS	60	Pre-Trip and Post-Trip Inspections
OBS	60	Pre-Trip and Post-Trip Inspections
PDS	30	Mirrors and Reference Points
OBS	30	Mirrors and Reference Points
BTW	150	Closed Course
OBS	150	Closed Course

DAY SEVEN 8.0 HOURS

PDS	45	Pre-Trip and Post-Trip Inspections
PDS	15	Mirrors and Reference Points
OBS	45	Pre-Trip and Post-Trip Inspections
OBS	15	Mirrors and Reference Points
BTW	180	Closed Course
OBS	180	Closed Course

DAY EIGHT 8.0 HOURS

BTW	240	On-the-road, safe BTW driving skills
OBS	240	On-the-road, safe BTW driving skills

DAY NINE 8.0 HOURS

BTW	240	On-the-road, safe BTW driving skills
OBS	240	On-the-road, safe BTW driving skills

DAY TEN 8.0 HOURS

BTW	240	
OBS	240	

WEEK THREE

DAY ELEVEN 8.0 HOURS

PDS	30	Lift Operations
OBS	30	Lift Operations
PDS	30	Securement Systems
OBS	30	Securement Systems
BTW	180	On-the-road, safe BTW driving skills
OBS	180	On-the-road, safe BTW driving skills

DAY TWELVE 8.0 HOURS

BTW	240	On-the-road, safe BTW driving skills
OBS	240	On-the-road, safe BTW driving skills

DAY THIRTEEN 8.0 HOURS

BTW	240	On-the-road, safe BTW driving skills
OBS	240	On-the-road, safe BTW driving skills

DAY FOURTEEN 8.0 HOURS

BTW	240	On-the-road, safe BTW driving skills
OBS	240	On-the-road, safe BTW driving skills

DAY FIFTEEN 8.0 HOURS

BTW	210	On-the-road, BTW Review
OBS	210	On-the-road, BTW Review
BTW	60	On-the-road, BTW Assessment

*Lessons in black = Separate Training

<u>Key</u>		HOURS
CLS	CLASSROOM	30.27
PDS	PRE-DRIVING SKILLS	3.5
OBS	OBSERVATION	39.5
BTW	BEHIND THE WHEEL	37.0
TOTAL HOURS		~ 110.27



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ATTACHMENT 3



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Safety Leadership



Study GUIDE

INTRODUCTION

This Course, Safety Leadership, will provide you with a thorough understanding of the importance of safety at Coach USA and your role in helping us achieve World Class Safety results.

These courses will help you to master all of the subject matter in about three hours. You can go at your own pace and according to your own schedule; but be sure to break up the sessions. Don't try to do all of it at once. Each unit is about 30 minutes long. After you've completed all of the courses, there is a final review to be completed on-line.

After you've successfully completed all of the courses and the final review, you'll have the knowledge needed to achieve better safety results.

World Class Safety

Our goal is to eliminate accidents and injuries and to do that, we need your help. Coach USA is committed to achieving World Class Safety. We want to be the industry leader when it comes to safety and we believe that superior safety results will provide us with a competitive advantage. This course will provide you with a better understanding of what needs to be done so that we can all reach our goals.

Your Role

Every member of our leadership team must personally take ownership of our safety results. As a member of our leadership team, you have a lot of responsibility: productivity, environmental standards and uninterrupted operations are just a few key areas where you focus your energies and influence our results. However, safety is a core value and must be part of everything we do.

You achieve results through your leadership skills, by gathering information, observing your employees, making decisions and motivating your people. This course is all about safety and what you can do to achieve superior safety results. Safety is a vital dimension of our business performance and, you're a safety manager - our front line of defense. Only you can reduce and eliminate the risks we face.

Every day you have dozens of opportunities to influence your employees, eliminate unsafe behaviors and reduce risks to make us safer.

You control safety results at Coach USA, because:

- You decide who we hire.
- You decide how well our people are trained.
- You decide what is or is not acceptable behavior.
- You decide the safety norms at your location.
- You decide if and when to take action with an employee.

NOTES

Blank lined area for notes.

UNIT ONE: OPENING PREVIEW

This unit introduces the course and affirms your personal responsibility for our safety results.

Key points:

- *Instructions on navigation.*
- *An overview of the subjects.*
- *An introduction of the WYTL concept.*
- *An affirmation of who is really responsible for safety at Coach USA (you).*

As new ideas are presented that you feel will be effective at your location, write notes about them in this guide.

Safety is the most important concern any of us can have.

Safety Leadership is the most important role you have.

UNIT TWO: ACCIDENTS

This unit studies accidents and why people have them. Our goal is to achieve World Class Safety and that begins with the complete elimination of accidents. Some people think that accidents just happen. They're wrong. Every accident has a cause, which means every accident can be prevented. Unit Two thoroughly investigates accidents and how they are caused.

Key points:

1. The definition of the word "accident."
2. Common accidents at Coach USA.
3. Three reasons why people have accidents.

Unit Outline

1. WHAT IS AN ACCIDENT?
 - a. Unplanned Event
 - b. Disrupts Activity
 - c. Affects People
 - d. Has a Cause
 - e. Review
2. WHAT ARE THE MOST COMMON TYPES?
3. WHY DO PEOPLE HAVE ACCIDENTS?
 - a. People Fail to Pay Attention
 - b. People Exceed their Capabilities
 - c. People Develop Patterns of Unsafe Behavior (PUB)
4. REVIEW
5. QUIZ

1. WHAT IS AN ACCIDENT?

An Accident is:

- An unplanned event,
- That disrupts activity,
- Affects people
- And has a cause.

If we can recognize situations and behaviors that lead to accidents, as leaders we'll be able to intervene and prevent them.

Disrupts Activity

We experience unplanned events every day, and go on without interruption. But what about when an unplanned event becomes an accident? When that happens, whatever you're doing at the time gets disrupted.

EXERCISE

Think about the most recent accident you can remember. It can be small or large. What kind of disruption did it cause? Take a moment and write down your answer. Then, select the "NEXT" button, when you're done.

Affects People

Even small accidents affect people, too. Property gets damaged.

Or, people are delayed or inconvenienced. Efficiency drops.

The affect might not be readily apparent or immediate. A dropped tool might not cause any real damage right away, but in the case shown, the gauge will have to be repaired or replaced once someone notices it.

Has A Cause

From a legal standpoint you can't take action against a what, only a "who."

For example, if a driver hits a fixed object, he or she is responsible. We can't say the trees, parked cars or mailboxes caused the accidents.

2. WHAT ARE THE MOST COMMON TYPES?

A "Near Miss" is a behavior that could result in an unplanned event that disrupts activity and affects people, and it could result in an accident – but for some reason, it doesn't.

Think about Near Misses. Why do we sometimes get away with unsafe behaviors?

EXERCISE

Think about all the accidents and injuries you've seen or heard over the years. Jot down a short description of the cause of each type of accident or injury. For example, "hit fixed object with fork lift" or "slipped and fell." Then, select the "NEXT" button when you're done.

Accidents

Hit fixed object with forklift

Injuries

Employee slipped and fell

EXERCISE

Compare the list on the screen with the accidents and injuries you wrote down on the last page. If there are accidents or injuries you didn't include on your list, add them now. After you've done that, click on the "NEXT" button.

Accidents

- Hit fixed object
- Backing
- Side swipe
- Head-on collision
- Struck vehicle from rear
- Struck while parked
- Ran off road
- Overturned
- Hit low overpass
- Struck parked vehicle
- Struck stopped vehicle
- Struck pedestrian
- Right hand turn collision
- Left hand turn collision
- Intersection accident (T-bone)
- Struck debris in road
- Struck animal
- Railroad crossing collision

Injuries

- Strained lower back
- Strained neck/upper back
- Strained shoulder/arm/wrist/hand
- Strained hip/leg/ankle/foot
- Slipped, tripped or fell
- Laceration / cuts
- Repetitive motion injuries of all types
- Vehicular accident-related injuries
- Broken bones

3. WHY DO PEOPLE HAVE ACCIDENTS?

- Unsafe behaviors of people cause accidents.
- Accidents are the result of human behaviors.

People Fail To Pay Attention

If you don't pay attention to what you're doing, eventually it will lead to an accident.

You can't keep track of every sensory input that comes at you. Your brain filters stuff out and pays attention to only what it thinks matters.

You even filter out more stuff so you can think about other things – like what's for lunch or where you want to go on vacation.

The problem with being on autopilot means you're not as aware when something around you changes – something that could be important.

What to do:

1. Slow down and carefully observe your environment, adjust your behavior. As a leader, you shouldn't go through life on autopilot. When you walk through your location, be aware of the environment, not only for your own safety, but for everyone.
2. If you see a situation that's not safe – either an object or a person's behavior, don't just make a mental note about it to fix it later. Do it right then.

People Exceed Their Capabilities

When people go past the limits of their abilities – accidents happen.

Exceeding your performance capabilities doesn't mean you're always going to have an accident. But that behavior puts you at risk for having an accident.

Being aware of these situations and doing a reality check help you apply this safety concept to daily routines.

90 percent of American adults suffer from back pain at some point. Why? Because so many people lift improperly – without bending their knees - exceeding their limits.

People Develop Patterns Of Unsafe Behavior (PUB)

If you don't have an accident as a result of your Unsafe Behavior, that in itself is a kind of reward. So you repeat the behavior and eventually it becomes a Pattern.

The first reason for Patterns of Unsafe Behavior is that there's a conscious, or sub-conscious evaluation of the reward versus the risk, and an acceptance of that risk in order to get the reward.

The second reason is ignorance. For example, when someone just doesn't know or isn't aware that the behavior is unsafe. This is important: ignorance isn't the same thing as stupidity. Ignorance simply means a person doesn't know. A very smart person might be ignorant about a particular subject. But they can learn.

You can correct situations where ignorance leads to Patterns of Unsafe Behavior by spending time with your employees, teaching and training them.

But, dealing with the first reason – people who are willing to accept risks for rewards – that’s much more difficult to correct, but it can be done.

4. REVIEW

- An accident is an unplanned event.
- It disrupts activity.
- It affects people.
- It has a cause.
- Accidents happen when people fail to pay attention.
- Accidents happen when people exceed their performance capabilities.
- And accidents happen when people develop PUBs – Patterns of Unsafe Behavior.

5. QUIZ

1. The definition of an accident states that ALL accidents end up affecting:
A. property.
B. Coach USA.
C. people
2. If accidents are caused, that means we can:
A. find reasons.
B. forgive ourselves.
C. prevent them.
3. From a legal standpoint, an accident is caused by:
A. people.
B. stationary objects.
C. the environment.
4. If we want to eliminate accidents, we must first have a common understanding of:
A. what kind of people cause accidents.
B. what to do in case of an accident.
C. what an accident is.
5. Accidents are ALWAYS the result of human:
A. negligence.
B. inability.
C. behavior.
6. Which of the following is NOT one of the three categories of behavior that lead to accidents:
A. people choose to have accidents.
B. people fail to pay attention.
C. people exceed their own capabilities.
7. A driver attempts to back the bus without using a spotter and runs over a mailbox. This is the best example of someone who is:
A. failing to pay attention.
B. exceeding their own capabilities.
C. developing an unsafe behavior pattern.

UNIT THREE: BEHAVIOR

This unit explores the basic motivations behind human behavior and how behaviors relate to our safety results. Your employees won't always behave like you expect they should. That's particularly true when it comes to safety. This unit will help you understand why people behave the way they do. Understanding behavior theory provides a foundation for leadership techniques.

Key points:

- 1. 300:29:1.*
- 2. How behaviors become patterns.*
- 3. Why people behave the way they do.*
- 4. Behavior management.*

Unit Outline

1. 300:29:1
2. CAN DO/WILL DO
3. MANAGING BEHAVIOR
4. QUIZ

1. 300:29:1

To be effective as a Coach USA Safety Leader, you need to recognize conditions and events that can lead to accidents. You also need to understand human behavior and the behavior patterns that can develop that will ultimately lead to accidents.

A Pattern of Unsafe Behavior always leads to an accident. But people think that because they got away with an unsafe act one time, they can repeat the behavior over and over and get the same result.

This probability ratio, developed many years by occupational scientists is called 300:29:1.

It means, for every 300 near-miss events without injury, there would be 29 minor to moderate injuries and 1 major injury or fatality.

What's important to remember is that you don't have to repeat an unsafe behavior twenty-nine times, or 300 times, or 20,000 times to have a tragic accident.

The laws of probability say that even the first time could be the time your number comes up.

The concept of 300:29:1 is not only that the situation could happen. Eventually, it will happen. And there's always a possibility that it will happen to you.



EXERCISE

Write down some of your own ideas of how you can communicate the concept of 300:29:1 to your employees. Think of ways you might promote the idea and get everyone talking about it. Then, select the NEXT button, when you're done.

2. CAN DO/WILL DO

The Can Do / Will Do theory states that there are six factors that make up every person. Your CAN DO side is made up of three factors that you can do. Factors that determine, for instance, if a person can do the job. They're your Knowledge, Skills and Abilities.

CAN DO

Knowledge

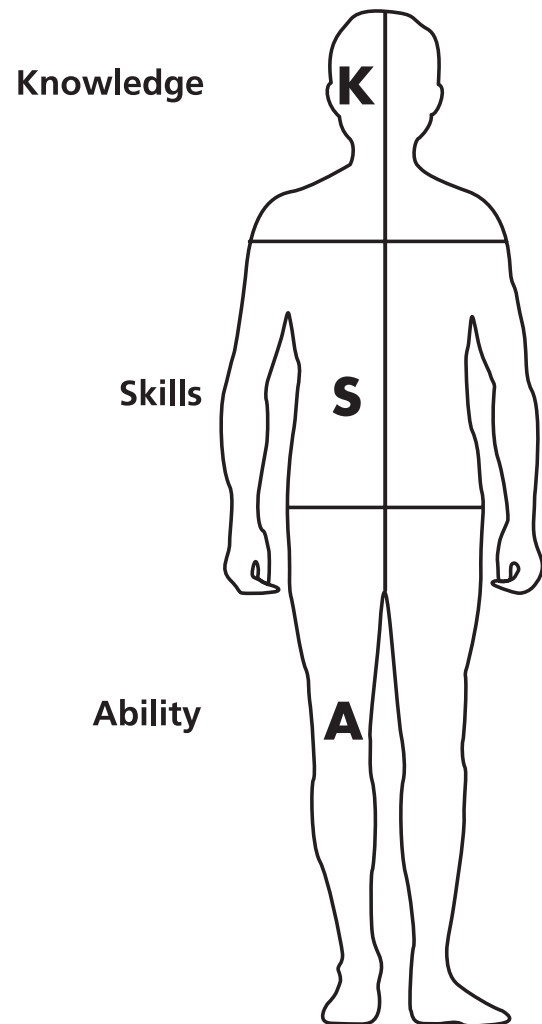
Knowledge is defined as the concepts and principles a person needs to know to do the job. For example, an electrician needs to know about circuits, amps, watts and volts and how they all relate to one another.

Skills

Skills are the result of a person applying knowledge to a task. Skills are defined as how to do things. They involve a physical act. Skills are almost always learned by watching someone else first, and then copying their behavior and practicing it over and over until it's perfected. Training and practice are essential to learn skills.

Ability

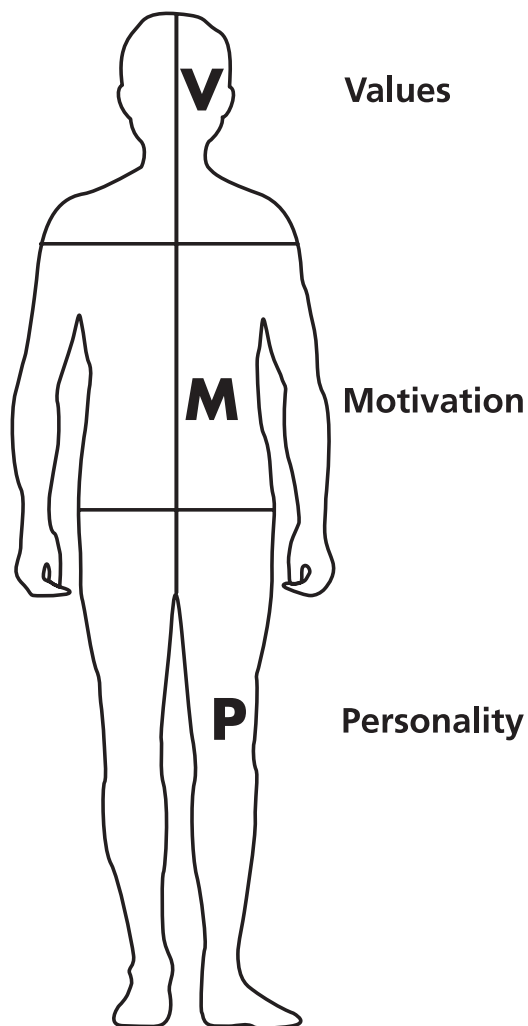
An ability is a physical or mental capacity that's necessary to perform a task. An ability isn't likely to change as the result of learning or practice. For example, eyesight.



These three Can Do factors – knowledge, skills and abilities - determine whether an employee Can Do the job. Without adequate knowledge, skills and abilities, the employee won't be able to do the minimum requirements of the job, even if he or she really wants to do well.

The WILL DO side is also made up of three factors and they determine whether or not a person will do the job. These factors are Values, Motivations and Personality.

WILL DO



Values

Values are the principles and beliefs developed through contact with your family, your culture, your religion, your ethnicity – your place in the human experience. Values have a strong influence on how you will act. On what you Will Do.

Motivations

Motivations refers to the types of activities to which a person is attracted, or the type of rewards they enjoy. The motivations connected to being a veterinarian? For starters, it would be someone who loves animals, who is willing to accept a lot of responsibility, interested in learning about the medical problems animals have.

Personality

Personality is how a person responds to situations, events and people. Good personality traits for working at Coach USA are things like cooperative, friendly, risk-averse, detail-oriented, focused on safety, compliant, self motivated and able to stay calm in stressful situations.

One of your most important jobs as a manager, is interviewing job candidates and determining if they have the right personality to be safe, dependable employees for Coach USA. It's important to find applicants who already have the right Values, Motivations and Personality, because these traits are very difficult to change.

3. MANAGING BEHAVIOR

People are all different. While the two theories of behavior apply to everyone, everyone will have his or her own reasons for behaving the way they do. By understanding how Behavior works, and why different factors influence a person's behavior, you'll be able to lead in a way that influences your employees to behave safely.

You don't want to punish an employee if he doesn't understand a particular principle. And, you don't want to waste time and money training him if he's doing unsafe behaviors when he knows better.

If you make sure your employees have the knowledge and skills they need to do their job, then their CAN DO factors will be aligned with their job, and they'll be safer on the job.

And, when you've established that safety is an important value, then your employees' WILL DO factors will begin to align with your local safety culture and they'll be safer on the job.

But observing the behaviors is just the first step. You also have to take action. You have to encourage safe behaviors and discourage unsafe behaviors.

4. QUIZ

1. In the ratio 300:29:1, 300 represents a number of:
 - A. unsafe behaviors.
 - B. minor accidents.
 - C. serious accidents.
2. Scientists have observed that for every 300 times an unsafe behavior is performed, there is:
 - A. one minor accident.
 - B. 29 minor accidents.
 - C. one tragic accident.
3. According to probability, you can perform an unsafe behavior at least _____ time/times before having an accident.
 - A. 0
 - B. 300
 - C. 8,700
4. The concept of 300:29:1 is that the situation:
 - A. could happen.
 - B. will happen.
 - C. probably won't happen.
5. A speed limit sign prompts you to adjust your speed and would be considered a:
 - A. catalyst.
 - B. reason.
 - C. action.
6. If you don't cross a traffic light because you didn't think you could make it without getting hit, getting hit is a(n):
 - A. demand.
 - B. action.
 - C. expected reward.
7. Which of the following actions can help you affect the "result that's expected" and therefore influence driver behavior?
 - A. Never walk past an unsafe condition.
 - B. Reward safe behaviors.
 - C. Both A and B
8. The facts and information that a person needs to do the job is called:
 - A. knowledge.
 - B. skill.
 - C. ability.
9. The types of activities to which people are attracted affect their:
 - A. values.
 - B. personality.
 - C. motivation.
10. If a driver knows the rules, but can't properly perform a procedure, the driver lacks:
 - A. knowledge.
 - B. skill.
 - C. motivation.

NOTES

Lined area for taking notes, consisting of multiple horizontal lines within a rectangular border.

UNIT FOUR: LEADERSHIP PRINCIPLES

This unit introduces the important concept of Norms and how they influence safety results. It then presents techniques you can use to observe your employees.

Knowing what to look for is the first step. We should integrate safety into our culture and into everything we do at Coach USA. This unit will present ways you can begin to build this culture of safety.

We want to help you, our safety leaders, to understand the techniques you can use and the tools that are available to help you improve the safety culture.

By working together, we can establish Norms at every location that will help us eliminate unsafe behaviors and unsafe conditions.

In the next unit, you'll learn what you can do once you have observed employees engaged in either safe or unsafe behaviors.

Unit Outline

1. UNDERSTANDING NORMS
 - a. Understanding Norms
 - b. Precedents and Carry Over
 - c. Social Influence
 - d. Importance
 - e. Leadership

2. OBSERVING
 - a. Observing Operators
 - b. Observing Maintenance
 - c. Techniques and Tactics

1. UNDERSTANDING NORMS

The goal of every Coach USA manager and supervisor should be to create a culture of zero-tolerance norms. Actually, a Double-Zero Tolerance: ***No unsafe conditions.***
No unsafe behaviors.
That's the norm we're all working toward.

Understanding Norms

A norm is a rule that's socially enforced. It's not written down anywhere like a rule, but it's more powerful. It's something that's actually part of a culture. A norm is basically the accepted way of doing things. People follow norms because we all want to be accepted.

At Coach USA, we want to establish norms that make any unsafe behavior an extremely offensive act.

The only acceptable behaviors are safe behaviors. Our goal is to have everyone at Coach USA working together to set the safest norms possible. Every manager, every supervisor and every employee. If anyone sees an unsafe behavior or an unsafe condition, they should feel empowered and obligated to take immediate action, every time. If everyone begins to do this, we'll build a culture of safety.

It begins with you. By your actions, you establish and maintain the norms at your location.

One of the best opportunities you have to set norms is when a new employee first joins Coach USA.

Precedents and Carry Over

Norms are developed over time. Many have been around so long people don't even think about them, or know how they got started in the first place. But a norm doesn't just happen by itself. And the event that gets a norm started is called a Precedent.

If a new employee already has safe behavior ingrained into him from his last job, he'll bring this behavior with him. He helps to establish a new precedent at your location. It works the other way too. If you hire someone who's used to taking short cuts when it comes to safety, what's going to happen when they start working for Coach USA? And, what influence will their unsafe behaviors have on your other employees?

Social Influence

Because norms are, by definition, socially enforced rules, the role of social influence can't be understated.

If your location has made safe behavior a norm, new employees will simply adapt to the culture of safe behavior.

Norms are nurtured by consistency. When a behavior is repeated over and over, with consistent results, that behavior becomes accepted as the norm. If a behavior no longer has positive results, it will fall out of favor with the culture and disappear as a norm.

That's why it's so important to establish norms for zero tolerance of unsafe behavior and unsafe conditions, and to reinforce them consistently, day after day.

As the manager or supervisor, you decide what is or isn't acceptable behavior. You decide on the norms. That's why the responsibility for our safety results rests with you.

Importance

Norms are always influenced by important events. Unfortunately, it's usually when an accident occurs that people give safe behavior an additional sense of importance. Even more unfortunately, over time the level of importance can decrease, even though we know that because of the ratio of 300:29:1, the probability of an accident is always with us.

Leadership

It's said that the acceptable practices in every company are set by the lengthened shadow of one person. That's you. Never underestimate your power as a leader and role model to influence behavior and create norms.

You must "walk the talk."

2. OBSERVING

Look for the behaviors that you already know lead to our most frequent accidents, because that's where the Near Misses are.

For example:

- Operators who go through yellow lights.
- Operators who follow too closely.
- Operators who don't pay attention to what's going on around them.
- Operators who don't pre-trip the bus properly.

For some managers, there are two problems to confront when it comes to observing employees.

1. Making the time to do it.
2. Concern about how Observing might be perceived by your employees.

Observing Operators

There are two kinds of Observations you can make. Active and Passive.

Active Observation is just what it sounds like. Schedule yourself to spend time in the yard. That can mean actively watching or even being part of the action once in a while. Active Observation will help maintain the highest standards, not just in safety, but in all areas of job performance.

Passive observation means looking at things that indicate whether your people are performing safely and efficiently. For example, you might not get to observe the way every operator works, but carefully listening to comments, talking with employees in dispatch or reservations, reviewing any complaints or suggestions and asking questions can give you vital information about whether or not action is needed.

Observing Maintenance

Use a proven observation technique known as MBWA...Management By Walking Around.

You should perform regular Double Zero Tolerance Audits.

Start by walking around your location, looking for any unsafe conditions. Also look for proper signage, housekeeping

and any obvious unsafe situations.

These situations don't cause accidents. They're just conditions in the environment. What causes accidents is some form of unsafe behavior that puts people in a position to get hurt. And one common unsafe behavior is ignoring or not reporting a potentially unsafe condition.

For someone to trip over an object, the object has to be left on the ground in the first place. And often, people have walked by it or stepped over it several times before someone who's not paying attention actually has an accident. (300:29:1)

That's why it's so important to make a big deal about it the very first time you spot it. Not only do you prevent the run up to the 300 unsafe behaviors of stepping over it, you also reinforce the zero-tolerance norm.

To have a true Double Zero Tolerance safety norm at your location, you have to observe and eliminate both unsafe behaviors and unsafe conditions.

Techniques and Tactics

Do a complete check of the location in the morning, before you go into your office. If you notice an unsafe condition you can give it top priority.

Use the Behavior-Based Safety Program to create Observation Teams, that way you'll increase the number of people looking out for unsafe conditions and unsafe behaviors. The more eyes, the better chance you'll see something before it becomes a problem.

Schedule time to walk through the location every Tuesday and Thursday. Either follow an operator or mechanic around or sometimes just spend time walking with a supervisor.

3. QUIZ

1. Looking at things that can indicate whether a driver is performing safely is called:
 - A. Passive Observation.
 - B. Active Observation.
 - C. Performance Observation.
2. MBWA stands for Management By:
 - A. Writing Audits.
 - B. Walking Around.
 - C. Waiting Accidents.
3. If someone trips over an obstacle in the yard, it's the fault of:
 - A. someone else.
 - B. the environment.
 - C. that person.
4. The bulk of your day should be spent on the computer, filling out reports and talking on the phone.
 - A. True
 - B. False

NOTES

UNIT FIVE: LEADERSHIP TECHNIQUES

This unit builds on the observation techniques taught in Unit Four and introduces specific actions you can take that will influence employee behavior.

You set the examples and establish expectations.

Most importantly, you can take action whenever you observe an unsafe behavior. This course presents the various methods and techniques you can use to influence your employees and achieve better safety results.

Key points:

- 1. Management Versus Leadership.***
- 2. Can Do / Will Do.***
- 3. Taking action.***
- 4. Setting examples.***

Unit Outline

1. MANAGEMENT VERSUS LEADERSHIP
 - a. Management - Can Do
 - b. Leadership - Will Do
2. TAKING ACTION
 - a. Set Examples
 - b. Establish Expectations
3. REVIEW
4. QUIZ

1. MANAGEMENT VERSUS LEADERSHIP

Management and Leadership may seem like the same thing, but there are some differences that are important to consider.

Here are two very simple definitions to consider:

1. Managers manage things and that means they control, direct and count.
2. Leaders lead people and that means they inspire and influence others to behave in certain ways.

Management - Can Do

As a Coach USA manager, you're responsible for managing lots of things. And as a Risk Manager, it's your job to look for things that could hurt employees or damage company property. In this role, you work to eliminate unsafe conditions.

Being an effective manager is essential to having a safe and efficient location.

Otherwise, if things are confused or out of place you might not even notice the potential for an accident, until it's too late.

In terms of safe behavior – Management tends to focus on the Can Do side of Behavior – the things you can Manage are things that assure your employees Can Do their jobs correctly and safely.

As you work toward a Double-Zero Tolerance norm – that is, no unsafe conditions and no unsafe behaviors – the manager in you will be taking care of that first zero.

One of the best opportunities a manager has for creating a culture of safety is by starting with employees who already have good records for safety. Once you've hired someone who meets all of our minimum criteria and appears to be a good fit, your job of manager is to make sure that they get the knowledge they need so they Can Do their job. That begins with education: teaching them what they need to know.

The next strategy is Training. That's how skills are taught. It's your responsibility to determine whether or not employees Can Do their job. And while education is for providing knowledge or information, training is for mastering skills.

Effective training follows a four-step process.

1. Providing information, including the benefit of learning the skill.
2. Demonstrating the skill, which is called modeling.
3. Allowing the person to practice the skill.
4. Providing encouragement and feedback, especially when they first start learning.

Leadership - Will Do

Leadership is not power, it's responsibility. You have to personally value the concept of safety so much that it becomes an integral part of your own daily life. You set the example for your employees of how much value you place on safety. If you do, they will begin to follow your lead.

You also have to value your employees

working under your leadership.

Value their ideas for improving safety conditions and allow them to be involved in the process, not just recipients of it. And, through your own personality, you have to provide support and show interest in your people. Be empathetic with their problems. Try to remain optimistic and helpful. Always remain firm, fair and consistent.

2. TAKING ACTION

To be a Safety Leader, you have to be the one who takes action. By taking action every time you see something, you set the example for your employees and eventually, everyone will keep an eye out for unsafe conditions and unsafe behaviors.

Set Examples

People look to a leader for clues about how they are supposed to act, and confirmation that they're behaving the right way. That's known as Leading by Example.

There are two examples of actions a Leader takes – Modeling and Feedback.

Modeling is teaching by demonstrating a skill or behavior you want someone to learn. By openly observing conditions and behavior at your location, and by taking action whenever you see unsafe behavior, you're modeling for everyone.

Feedback is a technique commonly used in training. Feedback needs to be given as quickly as possible. But you might not have considered Feedback as a means of setting examples. By making

safety feedback a regular part of your Observing routine, you'll be setting an example for others to follow. Which is how norms become norms.

Establish Expectations

The role of a leader is to establish and maintain the local safety culture. The best time to establish expectations is when a new employee is just starting out. On day one you should let them know you expect them to value Coach USA's culture of safety.

One of the most powerful ways of setting expectations is by telling people exactly what you expect. These are called explicit statements.

Two ways to establish expectations are: Communications and Shaping.

Communications comes from the Latin word that means "to share." You have important information about safety and you need to share it.

Shaping is another way to communicate and define your expectations. Shaping is a strategy that just about everyone uses everyday with their friends, family, employees and even total strangers.

There are three behavior shaping techniques:

1. Positive Reinforcement
2. Rules and Consequences
3. Discipline

Recognition is a very effective method for providing positive reinforcement. It can be as informal as a pat on the back, or it can be structured like an annual safety award.

3. REVIEW

A Rule is a Catalyst. It's a written definition of expected behavior. And most rules also include a definition of the Result that's Expected, if you break the rule. In order to establish Double-Zero Tolerance norms for safety, the consequences for breaking rules need to be firm, fair and consistent. That way, everyone will understand ahead of time what the Expected Result will be if they break the rules.

But if you allow anyone to bend the rules, you're accepting unsafe behavior and weakening the Circle of Care in your employees' minds. You're choosing NOT to be there. Doing that establishes a safety norm of acceptance. And that will lead to terrible results.

Discipline is another form of shaping that pairs a behavior with a negative result. Discipline can be used to diminish unsafe acts because people won't repeat behaviors that they've learned result in negative outcomes. However, there are several problems with discipline.

Some examples of discipline:

- A verbal reprimand
- A warning letter
- DML – Decision Making Leave
- Termination

Were You There Leadership means your employees will pay attention and act like professionals and won't exceed their capabilities or engage in unsafe patterns of behavior. They won't take unnecessary risks. It means they'll act the way they would, if You Were There with them all the time.

EXERCISE

What are some examples of the drawbacks of discipline?

4. QUIZ

1. A norm is a rule that is _____ enforced.
 - A. legally.
 - B. universally.
 - C. socially.
2. An event that gets a norm started is called a:
 - A. cause.
 - B. precedent.
 - C. reason.
3. The final element that can influence the creation of a norm is:
 - A. culture.
 - B. precedent.
 - C. example.
4. You need to eliminate both unsafe conditions and unsafe:
 - A. people.
 - B. behavior.
 - C. vehicles.
5. Education is the best way of changing unsafe behavior that comes from a lack of:
 - A. skill.
 - B. knowledge.
 - C. motivation.
6. A person who is inexperienced maneuvering a vehicle in tight quarters would MOST benefit from:
 - A. training.
 - B. motivation.
 - C. education.
7. Teaching by demonstrating what you want someone to learn is called:
 - A. experimenting.
 - B. educating.
 - C. modeling.
8. To be effective, feedback needs to be:
 - A. positive.
 - B. intensive.
 - C. immediate.
9. Which is NOT a way to establish expectations:
 - A. communications.
 - B. modeling.
 - C. shaping.

UNIT SIX: BEHAVIOR-BASED SAFETY

This unit teaches the Behavior-Based Safety Process, which gets everyone involved in taking ownership for their own safety-related behaviors as well as the behaviors of all other employees at the location. The process is a structured way of tracking behaviors and posting the results for everyone to see. Each person has a responsibility to observe and take action.

Key points:

- 1. How to grow a culture of safe behavior.***
- 2. Getting people involved.***
- 3. Sharing your results.***

Unit Outline

1. INTRO TO BEHAVIOR BASED SAFETY
2. GETTING PEOPLE INVOLVED
3. SHARING YOUR RESULTS
4. SUMMARY AND REVIEW
5. QUIZ

1. INTRO TO BEHAVIOR BASED SAFETY

The Behavior-Based Safety Process gets everyone involved in establishing a culture of safety. Your employees go from thinking about their own behavior, to a point where they are actively watching out for the safety of others, as well.

2. GETTING PEOPLE INVOLVED

The goal of the Behavior-Based Safety Process is to get your employees looking for unsafe conditions and unsafe behaviors, and to recognize them when they see them.

Step One Hold a meeting to introduce Behavior-Based Safety. Describe the process, along with the rewards that can come from success and ask for everyone's support. After all, it's in everyone's best interest to make the place safer.

Step Two Ask for a few volunteers to form a safety team. No more than four or five operators and employees who you know are committed to safety. Hopefully, these are also the people who have the respect of their fellow employees.

Step Three Have the team go through your accident reports from the past year or two, looking for frequent or common incidents. What they're looking for is not the types of accidents that occurred – such as a yard accident or a back injury, but the types of **Behaviors** that led to the accidents – such as not using a spotter to back, or trying to lift something alone when they should have gotten help.

Members of the team should talk to the other employees about their recollection of the accidents in the reports, to make sure they agree on the **Behaviors** that caused them. The team should also ask for the input of others. At this stage, more ideas means more involvement.

Next, the team will decide on the top ten behaviors that caused the accidents and establish a goal for reducing them. For example, maybe they establish a goal of reducing the frequency of a particular unsafe behavior, such as following too closely, by 50 percent.

Step Four Hold a second meeting with everyone. This time, let the team present their findings and the top ten list to everyone. Let them show everyone the weekly behavior observation chart that will be posted for everyone to see and the goals.

Explain that when the goals are met, there will be rewards for everyone. The rewards can be simple and inexpensive like pins or patches, or fun like a pizza party – but the goals are for everyone and everyone should share in the success of reaching the goals.

3. SHARING YOUR RESULTS

Step Five Spend a little time everyday making sure everyone's involved. Operators and employees should be asked to watch for the ten unsafe behaviors - both in themselves as well as in others. Whenever someone sees one taking place, they should make a checkmark in the appropriate box on the chart.

Of course, anyone who observes an unsafe action should privately call it to the attention of the person they observe, but it takes time for them to build up the confidence to do that.

Some employees will never be comfortable providing that kind of feedback. And that's okay. What's important is to get everyone thinking about and watching for unsafe behaviors.

Step Six Take the chart down every week and add up the observations for each type of unsafe behavior. Put the totals on the master chart that shows the results over several weeks, so people can see their progress.

During your monthly safety meetings, or even when you have a chance to speak one-on-one with your people, refer to the chart. If you have people who used their initials, ask them to describe the behaviors they observed, without naming any names.

When your goals are achieved, it's party time!

Don't run this process year-round. It should be more like a special event, or a program. Keep it fresh by running it for about a month at a time twice a year.

4. SUMMARY AND REVIEW

The strength of *Were You There Leadership* comes from your dedication and persistence in achieving the important goal of Double Zero Tolerance Norms.

You:

- set the examples.
- establish expectations.
- get people involved.

You can grow a culture of safety where everyone knows and acts the way they would just as if you were there.

Continuously observe and take action if you ever see or become aware of an unsafe behavior or condition.

Get your people involved, get them looking for the unsafe behaviors and conditions. And encourage everyone to take personal ownership of your location's results.

Set the Norm for Double-Zero Tolerance:

- No Unsafe Conditions
- No Unsafe Behaviors

5. QUIZ

1. In the Behavior-Based Safety Process, your drivers and employees move from thinking about their own behavior, to a point where they are _____.
A. talking about each other
B. reporting bad behaviors to corporate
C. watching out for the safety of others
2. The weekly Behavior Observation Chart will have the _____ for reducing the frequency of each unsafe behavior.
A. names of people responsible
B. established goals
C. reasons
3. No one should ever name the individual who was engaged in the unsafe behavior.
A. True
B. False
4. Establishing a Double Zero Tolerance Norm simply means that there is _____ for any unsafe condition or unsafe behavior by anyone.
A. room
B. no tolerance
C. discipline
5. In the Behavior-Based Safety process, _____ determine(s) what unsafe behavior is.
A. accident reports.
B. employees.
C. the leader.



Behavior Based Safety Programs

Week _____

The Behavior-Based Safety process gets everyone involved, looking for unsafe behaviors and conditions. Be on the lookout for examples of the Top Ten Unsafe Behaviors listed on this chart -both in yourself as well as in others. When you see an unsafe behavior, make a check-mark in the appropriate box on this chart. If you feel comfortable with speaking with the person, do it quietly, privately and with respect. We are all in this together and safety is our number one priority.

During the next few weeks, we hope this effort will help us reduce the frequency of unsafe behaviors and unsafe conditions –the 300. This will help us reduce accidents and injuries.

Observed Unsafe Behavior	Monday	Tuesday	Wednesday	Thursday	Friday	Total for Week
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						
Grand Total						

Behavior Based Safety Programs

Master Chart _____



Observed Unsafe Behavior	Week One	Week Two	Week Three	Week Four	Week Five	Week Six	Week Seven	Week Eight	Average	Improvement?
1.										<input type="checkbox"/> Yes <input type="checkbox"/> No
2.										<input type="checkbox"/> Yes <input type="checkbox"/> No
3.										<input type="checkbox"/> Yes <input type="checkbox"/> No
4.										<input type="checkbox"/> Yes <input type="checkbox"/> No
5.										<input type="checkbox"/> Yes <input type="checkbox"/> No
6.										<input type="checkbox"/> Yes <input type="checkbox"/> No
7.										<input type="checkbox"/> Yes <input type="checkbox"/> No
8.										<input type="checkbox"/> Yes <input type="checkbox"/> No
9.										<input type="checkbox"/> Yes <input type="checkbox"/> No
10.										<input type="checkbox"/> Yes <input type="checkbox"/> No
Grand Total										<input type="checkbox"/> Yes <input type="checkbox"/> No

ATTACHMENT 4

Safety Audit - Purpose

This audit will assist the operating companies of *Coach USA/Coach Canada* to remain in compliance with various federal and state agencies governing the operation of business within their jurisdiction. It also will audit local company compliance with all *Coach USA/Coach Canada* safety policies and procedures, legal and regulatory requirements.

It is designed as a checklist to walk through safety and regulatory topics that would mirror a full compliance review conducted by the Federal Motor Carrier Safety Administration (FMCSA). In addition it will help to maintain compliance of OSHA regulations, EPA environmental compliance and adherence to maintenance and safety policies and procedures.

It is not intended to be a process to penalize a company. It shall be conducted as an overview and training process to help the operating company achieve the compliance goals of *Coach USA/Coach Canada*, and to provide a safe environment for our employees, our onboard guests and the general public. It will also serve to educate our maintenance, operations and safety teams on proper safety practices and the policies and procedures established by Coach USA.

Scoring Process

Safety is the core value at Coach USA/Coach Canada. Therefore, there is nothing on the Audit that is optional or 'not really that important.' Every employee within Coach USA/Coach Canada needs to support and embrace the value of safety and compliance and should make every effort to meet full compliance in all areas/divisions of the Safety Audit. The Regional Director of Safety shall work with your local company leaders to execute and monitor the action plan to correct any deficiencies. Improvements and/or continued non-compliance will be reported to the Vice President of Safety.

Point Scoring System

1 Point	Required - low risk
2 Points	Required - medium risk
3 Points	Required - high risk, affects safety, compliance
4 Points	Required - high risk, affects safety, compliance, customers, the environment, etc.
5 Points	Extreme - Must comply Immediately

Safety Audit Process



Safety Audit Review

Confidential

Depot Score

0.00%

Company

Location

Review Date

Auditor

Randy Ross

Distribution, (Group)

*L. Burtwistle
D. Manuele
J. Louis
R. Kinnear*

*Chief Operating Officer
Vice President Maintenance
Vice President of Safety
Chief Financial Officer
Regional Vice President*

*Coach USA/Coach Canada
Coach USA/Coach Canada
Coach USA/Coach Canada
Coach USA/Coach Canada
Coach USA/Coach Canada*

Distribution, (Company)

R. Ross

*Regional Director of Safety
General Manager
Safety Manager
Regional Director of Maintenance
Audit Team*

Review Result Summary

Color Code:

- Section Satisfactory*
- Section Requires Improvement*
- Section Presents High Risk*

<i>Section Audited</i>	<i>Audit Checklist Score</i>	<i>Score weighted by section</i>
<i>Safety Culture</i>	0.00%	0.0%
<i>Safety Management</i>	0.00%	0.0%
<i>Regulatory Compliance</i>	0.00%	0.0%
<i>Facilities</i>	0.00%	0.0%
<i>Maintenance</i>	0.00%	0.0%
<i>OSHA Sensitive</i>	0.00%	0.0%
<i>Safety Plan</i>	0.00%	0.0%
<i>Driver Training</i>	0.00%	0.0%
		0.00%
	Total Audit Score	

Risk Rating

HIGH < 80%
Moderate 80-89%
Low 90-100%



Audit Summary:

--

Coach USA Safety Audit - Safety Culture												
#	EXPECTED CONTROL	AUDIT RESULT			POINTS AVAILABLE/POINTS SCORED			REVIEW FINDINGS & RECOMMENDATIONS	ACTIONS AGREED TO RESOLVE	RESPONSIBLE PERSON	DATE ISSUE WILL BE RESOLVED	DATE RESOLVED
		YES	NO	N/A	Pts	Total Points Available	Total Points Scored					
1	Risk Area: Safety Awards/Employee Recognition											
a	Is there a program in place to recognizing employees for being accident free?				2	2	0					
b	Is the Safety Bulletin Board used for current company posters and bulletins only? Neat, Organized and Uncluttered				3	3	0					
	For Unions, is there a Bulletin Board for communications? Neat, Organized and Uncluttered				3	3	0					
c	Is the list of accident free award winners posted on the Safety Bulletin Board?				2	2	0					
New	Safety Culture Awareness											
2	Risk Area: Facility											
a	Is the Company Mission Statement displayed in a prominent place where all employees can see them?				3	3	0					
b	Is the most current safety poster on display?				3	3	0					
3	Risk Area: Driver and Technician Interviews											
a	State 2 or 3 corporate values and ask them to describe specific behaviors that demonstrate people living by those values				1	1	0					
b	Can the driver and technician describe new operator training program in as much detail as possible. (Hired within 1 year)				3	3	0					
c	Can the driver and technician describe the most recent safety meeting, who was the presenter(s) and what was the main subject?				3	3	0					
d	Can the driver and technician define the word "safety" and the word "risk."				2	2	0					
e	Does the driver or technician know what are the three main reasons people have accidents?				2	2	0					
f	Does the driver know what is a safe following distance for the type(s) of vehicles you drive and how do you verify it?				3	3	0					
g	Does the driver and technical know what is the definition of G.O.A.L.				2	2	0					
h	Does the driver and technician know what is the definition of LLLC? (Discuss each element to assure a full understanding)				2	2	0					
4	Risk Area: Managers and Front-line Supervision Interviews											
1	Can the Managers and Supervisors define the word "safety" and the word "risk."				2	2	0					
2	Can the manager and supervisor define the word "accident."				2	2	0					
3	Does the manager and supervisor know what are the three main reasons people have accidents?				2	2	0					
4	Can the managers and supervisor describe the theory of 300 : 29 : 1				3	3	0					
5	Is there a person responsible for safety results at their depot?				2	2	0					
6	Can the location describe what can and should you do to reduce the frequency of accidents and injuries? (Discuss the responses to assure there is an understanding of their responsibility to observe and correct unsafe behaviors before they are repeated so often that they lead to major losses)				3	3	0					
5	Risk Area: Accident vs Preventable											
a	Does the General Manager understand the difference between the cause of accident and determining if the accident was preventable?				3	3	0					
b	Does the Safety Manager understand the difference between the cause of accident and determining if the accident was preventable?				3	3	0					
Scored Areas		Total Yes	Total No		Pts	Total Points Available	Total Points Scored	Score				
		0	0		54	54	0	0.00%				
0.00%		HIGH RISK										

New	Safety Culture Awareness	
Interviews - Drivers, technicians Randomly select (what number?)		
D1	State 2 or 3 corporate values and ask them to describe specific behaviors that demonstrate people living by those values	
D2	Describe new operator training program in as much detail as possible. (Hired within 1 year)	
D3	Describe the most recent safety meeting, who was the presenter(s) and what was the main subject?	

D4	Define the word "safety" and the word "risk."	
D5	What are the three main reasons people have accidents?	
D6	What is a safe following distance for the type(s) of vehicles you drive and how do you verify it?	

D7	What is the definition of G.O.A.L.	
D8	What is the definition of LLLC? (Discuss each element to assure a full understanding)	
	<i>Interviews - Managers and front-line supervision (All, number or percentage?)</i>	
M1	Define the word "safety" and the word "risk."	

M2	Define the word "accident."	
M3	What are the three main reasons people have accidents?	

M4	Describe the theory of 300 : 29 : 1	
M5	Who is responsible for safety results at their depot?	
M6	What can and should you do to reduce the frequency of accidents and injuries? (Discuss the responses to assure there is an understanding of their responsibility to observe and correct unsafe behaviors before they	

	<i>Interviews - General and Safety Managers</i>	
GSM1	Explain the difference between the cause of an accident and determining preventability.	

Coach USA Safety Audit - Safety Management

#	EXPECTED CONTROL	AUDIT RESULT			Pts	POINTS AVAILABLE/POINTS SCORED			REVIEW FINDINGS & RECOMMENDATIONS	ACTIONS AGREED TO RESOLVE	RESPONSIBLE PERSON	DATE ISSUE WILL BE RESOLVED	DATE RESOLVED
		YES	NO	N/A									
6	Risk Area: Schedule Departures												
a	Is the driver check in form being used?				2	2	0						
7	Risk Area: Safety Policies												
a	Are all Coach USA/Mega Bus policies contained in SharePoint being adhered to?				4	4	0						
b	Have all Megabus drivers received and signed off on the Megabus driver handbook? Critical if failed on more than one review.				3	3	0						
c	Are corporate values posted in the drivers room, maintenance and dispatch?				3	3	0						
d	Have all drivers received and signed off on the safety Driver Handbook?				4	4	0						
e	Are the daily Safety Messages posted in the drivers, maintenance and dispatch areas?				3	3	0						
f	If the location has a TV monitor for announcements, are the announcements current?				3	3	0						
g	If the location has a TV monitor is the monitor placed for all employees to see, drivers and maintenance?				3	3	0						
h	Are Operators with Seeing Machine fatigue or distracted driving events being counseled and/or disciplined? Are these actions documented?				5	5	0						
8	Risk Area: Operations/Customer Service Controls												
a	Is there a route guide available with turn by turn instructions for all fixed route schedules and up dated when pick up locations change?				3	3	0						
9	Risk Area: Accident Repeater Policy												
a	Is the company adhering to a repeater policy consistent with corporate guidelines and/or union contract?				4	4	0						
b	Is remedial training conducted for all preventable accidents upon drivers return to home terminal and prior to driver returning to commercial driving duties?				3	3	0						
c	Are all accidents investigated with rating in file and driver counseled by department manager?				4	4	0						
d	Are photo's of vehicle damage in file?				3	3	0						
10	Risk Area: ADA Annual Reporting for Accessible Request												
a	Has the company submitted their annual reports indicting all requests received for accessible and/or equivalent service in each 12-month reporting period October 1 of the prior calendar year through September 30 of the calendar year when the report is submitted?				3	3	0						
b	Is the company documenting passenger accessibility service requests in accordance with ADA Guidelines for OTRB companies and maintaining them for 5 years. (49 CFR part 37, subpart H)				3	3	0						
c	Has the report been sent to the address Federal Motor Carrier Safety Administration Office of Information Management MC-RIS 1200 New Jersey Avenue, SE Washington, DC 20590? Keep copy of envelope to document mailing				3	3	0						

11	Risk Area: Occupational Health												
a	Are pre-placement physical exams performed, when required?				3	3	0						
b	Has a biennial review of the clinic been performed?				3	3	0						
c	Is the Return to Duty Questionnaire being used?				3	3	0						
d	Are First Aid Kits available in all facilities?				3	3	0						
12	Risk Area: Claims Management												
a	Is company familiar with claims reporting procedures?				3	3	0						
b	Does dispatch use a "Notification Worksheet" to obtain basic information following an accident?				3	3	0						
c	Does company have the Major Incident Reporting Procedures posted?				3	3	0						
Scored Areas		Total Yes	Total No		Pts	Total Points Available	Total Points Scored	Score					
		0	0		77	77	0	0.00%					
0.00%			HIGH RISK										

Coach USA Safety Audit - Regulatory Compliance

#	EXPECTED CONTROL	AUDIT RESULT			Pts	POINTS AVAILABLE/POINTS SCORED		REVIEW FINDINGS & RECOMMENDATIONS	ACTIONS AGREED TO RESOLVE	RESPONSIBLE PERSON	DATE ISSUE WILL BE RESOLVED	DATE RESOLVED
		YES	NO	N/A								
13	Risk Area: Environmental											
a	Is a Tier II Report, or equivalent, complete? (CUPA in California)				4	4	0					
b	Are Hazardous Wastes disposed of properly?				4	4	0					
c	Are shipping manifests for Hazardous Wastes retained?				4	4	0					
d	Are BMP's followed in the SWPPP Plan being followed?				4	4	0					
e	If an SPCC plan is required are BMP's in the plan being followed?				3	3	0					
f	If a SPCC is not required, is there a spill control program in place?				3	3	0					
g	Is yearly SPCC training documented?				3	3	0					
h	Are quarterly visual inspections under SWPPP documented?				3	3	0					
14	Risk Area: Permit Review											
a	Are all permits under worksheet Attachment 8A and *B current?				5	5	0					
15	Risk Area: DOT Vehicle Inspections											
a	Does the location use the correct company DVIR book?				2	2	0					
b	Are drivers completing pre-trip / post-trip inspections efficiently and consistently?				3	3	0					
c	Are DVIRs reviewed by maintenance every day, filed by bus number and audited by beginning and ending mileage to assure no DVIR's are missing?				3	3	0					
d	Has the Maintenance Technicians signed off on the DVIR when defects are noted?				3	3	0					
e	Do all drivers check off the Vehicle Defect Box?				3	3	0					
f	Are DVIRs kept for 90 days? (49 CFR 396.11(a)(4))				5	5	0					
g	Are all DVIR's on file under 100 days? Unless State specified				3	3	0					
h	Are safety announcement scripts provided to all drivers?				4	4	0					
16	Risk Area: ELD											
a	Is the Prox ELD Software compliant?				2	2	0					
b	Is the touchscreen configuration version ELD compliant?				2	2	0					
c	Are the driver logs with no signature being reviewed by local personnel?				2	2	0					
d	Are drivers hours of service limits being reviewed by the local personnel?				2	2	0					
19	Risk Area: Driver Qualification Files (DQF)	Select 10% DQFs including the last three drivers hired. Does each file contain the items listed in Attachment 10										
a	Is there a checklist in the Driver Qualification File that shows all required documentation has been signed, dated and filed?				1	1	0					
b	Does the location have a system established that will ensure drivers' medical certificates remain current?				1	1	0					

c	Does the company comply with the road test provisions of section 391.31 requiring a road test and issuance of a certificate?				1	1	0					
d	If any new applicant has worked and/or lived in another State, was that State's MVR obtained?				1	1	0					
d	Are all MVR's reviewed annually? Is the signature on file for verification?				3	3	0					
e	For new hires - Does the location request previous Drug & Alcohol results as well as Work History going back three years?				4	4	0					
f	Are Driver Qualification Files kept separate from personnel files?				3	3	0					
g	Are Driver Qualification Files complete with each form needed inside? Photocopy of front and back of license and medical card				3	3	0					
h	Is there documentation showing all new employees have received training on the use of any ticketing equipment, routes and all vehicle types?				3	3	0					
i	Are DQFs separated for Active and Terminated?				3	3	0					
j	Are Terminated DQFs kept on hand for three years?				3	3	0					
k	Are Driver Qualification Files complete before the Operator is allowed to drive?				5	5	0					
20	Risk Area: Driver License and Medical Credentials											
a	Do all drivers have a current license with endorsement?				4	4	0					
b	If the driver is required to have medicine on hand, has it been recorded with Dispatch?				3	3	0					
c	If the driver has a visual restriction on their license, does Dispatch verify the driver has their glass or corrective lenses?				3	3	0					
21	Risk Area: Driver Certification 19A											
a	In California and New York, if the driver is responsible for driving "Vulnerable" groups. Children and Seniors does the driver have the application 19A?				3	3	0					
22	Risk Area: Safety Performance History File (after 10/30/04) (49 CFR 391.23 c1)											
a	Are the requests and replies from previous employers regarding the drivers safety history kept in this file?				3	3	0					
b	Has the driver acknowledged and signed the understanding of the inquiry and rebuttal process documented in the file?				3	3	0					
c	Are requests from future employers kept in the Safety Performance History File?				3	3	0					
23	Risk Area: DOT – Accident Reporting											
a	Can the company explain the definition of a recordable accident?				3	3	0					
b	Can the company explain the fatal accident reporting requirements?				3	3	0					
c	Is there documentation showing all drivers have an Accident Reporting Package?				3	3	0					
d	Does the driver sign off on a piece paper stating they understand how to complete the Accident Reporting Package?				3	3	0					
e	Is the company maintaining a DOT accident log?				4	4	0					
f	If an accident occurs, has the driver received guidance and retraining?				3	3	0					
24	Risk Area: DOT – Hours of Service											
a	Are driver's hours of service being tracked via time cards or grid-style log?				3	3	0					

b	Are the State's requirements for hours of service followed?.				3	3	0					
c	Does the company know the hours of service requirements for their State?				3	3	0					
d	Are drivers complying with 395.8 or the State requirements for: 100 air mile radius drivers?				5	5	0					
e	Can the company explain the hours of service limitations (i.e. 10, 15, 60 in 7, 70 in 8, etc.)?				3	3	0					
f	Does the company file records of duty status in a systematic manner?				3	3	0					
g	Can the company produce the prior six months record of duty status for a driver selected at random?				3	3	0					
h	Are driver logs that are beyond 6 months properly disposed?				3	3	0					
i	Does the company have a system to effectively control the driver's hours of service?				3	3	0					
j	Does the company adhere to the Coach USA/Mega Bus hours of service policy?				5	5	0					
k	Check 395.2 Definitions –Guidance –is company in compliance with Question 2 –Guidance 1-4.				3	3	0					
l	AOBRD/ELD Auditing Procedures: Is "Audit Packet" complete as stated in Coach USA/Megabus Elog Use and Auditing Procedures Mandate? This packet must include a minimum of, violation reports printed at least weekly, documented counseling for valid violations, documented Saucon case information for violations caused by system malfunction, unassigned movement reports (printed at least weekly) showing no unassigned movements >= 15 mins, documentation of valid "adverse conditions" claims, copies of paper logs necessary due to system failures including documentation of Saucon cases to repair device and documentation of safety meetings and random D/A tests being logged as on duty not driving.				5	5	0					
m	Is there an Hours of Service (HOS) policy letter in writing?				3	3	0					
n	Are drivers who have 10/15/70 hour violations counseled by management with documentation of counseling available for review?				3	3	0					
o	Are paper logs, when necessary, turned in a timely manner? Are operators who are more than 13 days overdue turning in logs?				4	4	0					
p	Are electronic logs being signed at the end of each days assignment(s)?				4	4	0					
q	Are administrative edits being approved prior to the beginning of the next days assignment?				4	4	0					
r	Are available Hours of Service verified prior to Dispatch?				5	5	0					
27	Risk Area: Drug Testing											
a	Is the company drug screen log retained and current?				3	3	0					
b	Does the company have a written Substance Abuse Policy? (New policy issue 2018)				3	3	0					
c	Is the company Substance Abuse Policy posted in the Driver, Dispatch and Maintenance rooms?				3	3	0					
d	Have employees received training on the Substance Abuse Policy and is the training documented?				3	3	0					
e	Does the driver have a copy and understand FTA section 655 - Drug & Alcohol Use and Misuse Prevention, if applicable?				3	3	0					
f	Are Random drug screens evenly spread over the year?				2	2	0					
g	Are all "Safety Sensitive" employees pre-employment tested?				5	5	0					
h	Has each commercial vehicle operator and mechanic been trained in the DOT drug testing requirements?				3	3	0					

i	Have the supervisors received the minimum 2-hour training in the "Reasonable Cause" testing program?				3	3	0				
j	Are post accident tests, if required, being completed within the required time frame for Alcohol and Drugs?				3	3	0				

k	Drug and Alcohol Testing History (SEE ATTACHMENT 14 AUDIT CHECKLIST)										
QUARTER	DOT Random Drug		DOT Random Alcohol		DOT Drug Safety		DOT Alcohol Safety		Critical Violations		
	Req'd	Comp	Req'd	Comp	Comp	Comp	Comp	Comp			
JAN - MAR											
APR - JUN											
JUL - SEP											
OCT - DEC											

Scored Areas	Total Yes	Total No	Pts	Total Points Available	Total Points Scored	Score
	0	0	235	235	0	0.00%
0.00%		HIGH RISK				

Coach USA Safety Audit - Facilities

#	EXPECTED CONTROL	AUDIT RESULT			Pts	POINTS AVAILABLE/POINTS SCORED		REVIEW FINDINGS & RECOMMENDATIONS	ACTIONS AGREED TO RESOLVE	RESPONSIBLE PERSON	DATE ISSUE WILL BE RESOLVED	DATE RESOLVED
		YES	NO	N/A								
28	Risk Area: Facility/Security Inspections											
a	Are monthly facility safety inspections conducted? (Review last six inspections)				4	4	0					
b	Are key managers or supervisors involved?				3	3	0					
c	Are deficiencies identified and corrected in 30 days with correction dates listed? If not corrected note target correction date that is within 90 days				3	3	0					
d	Are security measures in place and documented? (Review last six inspections)				3	3	0					
e	Are fire extinguishers checked monthly with documentation?				4	4	0					
29	Risk Area: OSHA											
a	Is the current Federal OSHA Poster posted?				3	3	0					
b	Is the current State OSHA Poster posted?				3	3	0					
c	Are Drug Free Workplace Posting current?				3	3	0					
d	Are EAP (Employer Assistance Program) posted current?				3	3	0					
32	Risk Area: Equipment Service Shop											
a	Are workers trained on emergency fuel shut off procedures and is it documented?				4	4	0					

Scored Areas	Total Yes	Total No	Pts	Total Points Available	Total Points Scored	Score
	0	0	33	33	0	0.00%
0.00%		HIGH RISK				

Coach USA Safety Audit - Maintenance and House Keeping

#	EXPECTED CONTROL	AUDIT RESULT			Pts	POINTS AVAILABLE/POINTS SCORED		REVIEW FINDINGS & RECOMMENDATIONS	ACTIONS AGREED TO RESOLVE	RESPONSIBLE PERSON	DATE ISSUE WILL BE RESOLVED	DATE RESOLVED
		YES	NO	N/A								
33	<i>Risk Are: Driver Area House Keeping</i>											
a	Is the Driver Room clean?				3	3	0					
b	Does the Driver Room have comfortable seating so the drivers can relax?				3	3	0					
34	<i>Risk Are: Dispatch Area</i>											
a	Is the Dispatch Area Clean?				3	3	0					
b	Is the Dispatch area closed off from the office distractions?				3	3	0					
c	Is the Dispatch area organized? File Cabinets, Desks and Phones				2	2	0					
35	<i>Risk Are: Maintenance Area House Keeping</i>											
a	Is the lunch/break room clean and orderly?				3	3	0					
b	Are restrooms clean and orderly?				3	3	0					
36	<i>Risk Are: House Keeping Policy</i>											
a	Is the House Keeping policy posted and adhered to?				3	3	0					
Scored Areas		Total Yes	Total No		Pts	Total Points Available	Total Points Scored	Score				
		0	0		3	3	0	0.00%				
		0.00%		HIGH RISK								

Coach USA Safety Audit - OSHA Sensitive

#	EXPECTED CONTROL	AUDIT RESULT			Pts	POINTS AVAILABLE/POINTS SCORED		REVIEW FINDINGS & RECOMMENDATIONS	ACTIONS AGREED TO RESOLVE	RESPONSIBLE PERSON	DATE ISSUE WILL BE RESOLVED	DATE RESOLVED
		YES	NO	N/A								
37	Risk Area: OSHA – OSHA 300 Log 1910.5											
a	Are all required OSHA entries accurate?				3	3	0					
b	Are recordable injury or illness posted within seven working days?				3	3	0					
c	Are estimated days changed to actual?				2	2	0					
d	Are OSHA logs retained for 5 calendar years following the end of the year to which they relate?				3	3	0					
e	Is there a completed OSHA 301 form, WCI, or employer's first report of injury for each entry on the log?				3	3	0					
f	Is summary of all injuries and illnesses certified and posted from February 1 to April 30 of each year? Poster must be removed on May 1st of each year.				3	3	0					
g	Are work-related injuries and/or illness being reported for; death, loss of consciousness, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or a significant injury or illness diagnosed by a physician or other licensed health care professional within 24 hours?				4	4	0					
38	Risk Area: OSHA - Walkways/Working Surface 1910-21-22-24-30											
a	Are permanent aisles or passageways marked for walking areas?				3	3	0					
b	Are walking areas kept clear?				3	3	0					
c	Are speed limits posted at facility with clear directions of vehicle movements entering and exiting vehicle lot?				4	4	0					
d	Are circuit breaker boxes and fixed equipment shut off switches access kept clear?				4	4	0					
e	Are circuit breaker boxes properly labeled to controlling equipment or office?				4	4	0					
39	Risk Area: OSHA – Platforms 1910.21											
a	Are open sided floors or platforms used for persons to stand on 4 feet or more above the ground guarded by standard railings (42" high with a mid-rail and a 4" toe board)?				4	4	0					
b	Are minimum platform width at least 20 inches or more? Are items stored on shelving safely secured from falling?				4	4	0					
c	Are platforms attached/used with forklifts being considered a scaffold (OSHA letter of interpretation 11/27/2001)				4	4	0					
40	Risk Area: OSHA – Servicing Single-Piece Rim 1910.177											
a	Is tire cage installed per manufacturers specifications?				4	4	0					
b	Is there a written single-piece rim wheel safety program that includes trajectory, use of tire gauges, torqueing of lug nuts, strict compliance?				3	3	0					
c	Is tire service training documented?				3	3	0					
d	Is tire safety poster posted in tire repair area?				3	3	0					
43	Risk Area: Permit Required Confined Space 1910.146											
a	Is company in compliance per on-line regulations? (1910.149)				2	2	0					
44	Risk Area: Occupational Exposure to Blood Borne Pathogens 1910-1030											
a	Is a written exposure control/awareness program in place?				2	2	0					
b	Is an acknowledgement of annual training on file for all applicable employees?				2	2	0					

c	If the company has had any exposures (needle sticks, etc.), is there an exposure incident and follow-up report available along with a Hepatitis B Vaccination Decline Form in employee training file??				3	3	0				
d	Are there a sharps containers located in the maintenance area and wash bay?				3	3	0				
47	Risk Area: OSHA – Exit Routes 1910-133										
a	Does each Facility has at least two (2) exit routes?				3	3	0				
b	Are the Exit doors a minimum 28 inches wide?				2	2	0				
c	Are all exit doors unlocked from inside and free of restrictions?				2	2	0				
d	Are all ceilings of exit routes at least 7' 6" high?				2	2	0				
e	Are Facilities equipped with Emergency Alarm and Sprinkler system(s)? NOTE: Exception if employees can promptly smell a fire or other hazard in time to provide adequate warning)				3	3	0				
f	29 CFR 1910.37 Are All "EXIT" signs in English and a minimum of 6" high with letters 3/4" and lit with at least 5 ft candles?				3	3	0				
g	Doors, passages and/or stairway which could be mistaken as an "exit", Do they have the correct signs?				2	2	0				
48	Risk Area: OSHA – Flammable and Combustible Liquids Storage 1910-106										
a	All flammable or combustible liquids are not stored in office occupancy areas?				3	3	0				
b	Is there at least one portable Fire Extinguisher within 10-feet of the door opening into any room used for storage or not less than 10-feet but more than 25-feet from Class I or II liquid storage outside				4	4	0				
c	No Smoking Sign in open flames or smoking in flammable or combustible liquid storage areas?				3	3	0				
49	Risk Area: Employee Emergency Action Plan 1910-38										
a	Is there an OSHA Emergency Action Plan written?				4	4	0				
b	Are there maps showing exits and rally points in place?				4	4	0				
c	Are emergency reporting procedures in place?				3	3	0				
d	Are the job titles of emergency coordinators listed?				3	3	0				
e	Have all employees been trained on the plan and documented?				3	3	0				
f	Are employees designated to use fire extinguishers trained on their use?				3	3	0				
g	Have all employees been notified that an emergency exists?				3	3	0				
h	Are job titles of the persons who are to assist in the safe and orderly evacuation of employees posted?				2	2	0				
i	Are Emergency telephone numbers posted in all offices?				4	4	0				
j	Is Emergency Coordinator Designated in writing?				4	4	0				
k	Are facilities equipped with Fire Protection – Detection/Alarm systems?				3	3	0				
l	Are smoke alarms being tested monthly? Are supervised Fire Alarm systems being tested annually? Is the testing documented?				5	5	0				

Scored Areas	Total Yes	Total No	Pts	Total Points Available	Total Points Scored	Score
	0	0	144	144	0	0.00%
0.00%		HIGH RISK				

a	Has either of the First Aid Training Options been completed?				3	3	0					
b	OPTION 1: Accidents in suffocation, severe bleeding or other life threatening or permanently disabling injury or illness is expected or where there are corrosive materials with a response more than 4 minutes – FIRST AID Certification Required.				1	1	0					
c	OPTION 2: Circumstance where a life threatening injury is an unlikely outcome of an accident a 15-minute response is acceptable --- FIRST AID Certification NOT REQUIRED				1	1	0					
d	If Option 1 is being used does First Aid training comply with OSHA CPL 2-2-53?				3	3	0					
61	Risk Area: CSA											
a	Is the company monitoring their CSA basics for all inspections via data found on the CSA 2010 website?				3	3	0					
b	If a basic is deficient has the company taken corrective measures?				5	5	0					
c	Can the company provide a printed copy of there company CSA basics prior to the safety audit? This information should be reviewed printed and provided prior to the safety audit.				3	3	0					
d	Does the company have policies and procedures for controlling speed?				3	3	0					
e	After 9/30/05, is the company complying with the revised CDL disqualification rules in part 383.51 pertaining to both CMV and personal vehicle operating violations?				3	3	0					
f	Is there a process to continually inform Dispatch, Operations and Management when an Operator is Out-Of-Service (OOS)?				3	3	0					
62	Risk Area: Security & Emergency Preparedness Plan											
a	Has a plan completed per Transportation Security Administration?				3	3	0					
b	Are practice drills being completed?				2	2	0					
c	Are Managers and Dispatchers Trained on implementation of the manual?				2	2	0					
d	Are Security Inspections conducted and documented?				3	3	0					
e	Are Security Items agenda items for the Safety Committee?				3	3	0					
f	Has Security Assessment been completed in past year?				3	3	0					
g	Has Operation Secure Transport training been completed and documented?				3	3	0					
h	Do the Supervisors and Managers for Operations and Maintenance have a current copy of the Recovery Plan if the area has a major weather event, such as: Hurricane, Tornado, Earthquake, Flooding and any Major Storms?				3	3	0					
i	Does the management of the facility that is responsible for the Recovery Plan have a copy on and off site?				3	3	0					
j	Is there a list of responsible people on file that have the Recovery Plan?				3	3	0					
k	Does the location have a meeting regarding the Recovery Plan yearly?				3	3	0					
63	Risk Area: Bus Lot Safety											
a	Does the location bus lot have a speed limit of 5MPH posted?				4	4	0					
64	Risk Area: Night Driving											
a	Does Dispatch have a list of night drivers that bid into the evening shift?				2	2	0					

b	If the bus is not equipped with Seeing Machines, during a night time route drive, is there a relief driver on board?				2	2	0					
c	Holding - Documentation verifying B				2	2	0					
65	Risk Area: Driver Alert Program											
a	Are all company vehicles marked with Driver Alert Decal Phone Number both inside and outside the vehicle?				2	2	0					
b	Are driver's with repeat calls being identified and retrained?				3	3	0					
c	Are Driver's coached within 5 days of call and is it documented?				3	3	0					

Scored Areas	Total Yes	Total No	Pts	Total Points Available	Total Points Scored	Score
	0	0	147	147	0	0.00%
0.00%		HIGH RISK				

Coach USA Safety Audit - Driver Training

#	EXPECTED CONTROL	AUDIT RESULT			Pts	POINTS AVAILABLE/POINTS SCORED		REVIEW FINDINGS & RECOMMENDATIONS	ACTIONS AGREED TO RESOLVE	RESPONSIBLE PERSON	DATE ISSUE WILL BE RESOLVED	DATE RESOLVED
		YES	NO	N/A								
66	Risk Area: Training and Development											
a	Does the company adhere to the specific Coach USA/Megabus training syllabus for all new drivers?				3	3	0					
b	Are all work related injuries investigated with cause established and necessary retraining documented?				3	3	0					
c	Is the Coach USA Monthly Safety Campaign regularly being used as an additional focus on Safety				3	3	0					
d	Are safety meetings held at least quarterly or is there documentation of regular driver Safety Encounters?				2	2	0					
e	Is there documentation with meeting record that includes material presented during safety meetings and attached to sign in roster?				3	3	0					
f	Do all the drivers files show drivers have attended the Coach Commitment and ADA Training?				3	3	0					
g	Has the location trainer been trained by an accredited trainer or certified in LLLC?				3	3	0					
h	Is there documentation verifying that the "New Driver Assessment" has been completed between 60 and 90 days of a newly hired driver's release into revenue service.				4	4	0					
i	Is there documentation verifying that the Driver biennial refresher training has been completed?				3	3	0					
	MEETING DATE	NUMBER EMP	NUMBER ATTENDED	ATTENDANCE %								
1												
2												
3												
4												
5												
6												
j	Is the Company documenting annual ride checks for each driver. (This ride check is in addition to the biennial refresher training requirement in the opposing years)				3	3	0					
k	Have Operations personnel received training in the following:											
l	1) OSHA- Hazard Communication				3	3	0					
m	2) Overview of DOT Regulations - (Driver qualification/disqualification)				3	3	0					
n	3) Hours of Service (HOS)				3	3	0					
o	List managers who have received training											
#	MANAGER'S NAME	DATE / TYPE	POSITION									
1												
2												
3												
4												
5												
6												
7												
8												
9												
10												
67	Risk Area: New Driver/Employee Training											

a	Is a change of duty status form (PAF) used for new and departing employees and provided to payroll for timely entry?				2	2	0					
---	--	--	--	--	---	---	---	--	--	--	--	--

Scored Areas	Total Yes	Total No	Pts	Total Points Available	Total Points Scored	Score
	0	0	41	41	0	0.00%
0.00%		HIGH RISK				

ATTACHMENTS:

ATTACHMENT 1 - ACCIDENT REPEATERS (2 OR MORE PAST 24 MONTHS)

ATTACHMENT 2 - ACCIDENT REPEATERS (1 OR MORE PAST 12 MONTHS)

ATTACHMENT 4 – VISUAL SWPPP INSPECTION

ATTACHMENT 7 - INSURANCE CERTIFICATES CHECKLIST

ATTACHMENT 8A – PERMITS & CARRIER DOCUMENTS CRITERIA

ATTACHMENT 8B – PERMITS & CARRIER DOCUMENT UNIT AUDIT

ATTACHMENT 10A - DRIVER QUALIFICATION FILE (DQF) CRITERIA

ATTACHMENT 10B - DRIVER QUALIFICATION FILE (DQF) MATRIX

ATTACHMENT 11A – TRAINING FILE CRITERIA

ATTACHMENT 11B – TRAINING FILE MATRIX

ATTACHMENT 12 - MOTORCOACH OPERATOR'S LOG AUDIT

ATTACHMENT 14 – DRUG AND ALCOHOL PROGRAM AUDIT

ATTACHMENT 17 - TRAJECTORY

ATTACHMENT 18 - TIRE INFLATOR CAGE

ATTACHMENT 19 – VEHICLE MAINTENANCE SHOP SAFETY CHECKLIST

ATTACHMENT 20 - GLOSSARY OF REFERENCES AND SUPPORTING INFORMATION

ATTACHMENT 1 - ACCIDENT REPEATERS (2 OR MORE PAST 24 MONTHS)

(BACK TO SECTION 4 - ACCIDENTS)

OPERATOR'S FULL NAME	# ACC PAST 24 MON	MOST RECENT ACTION
Wayne Cambell	2	11/29/18 2 day suspension, Re-trained
Charles Alva	2	12/11/18 2 day suspension, Re-trained

ATTACHMENT 4 – VISUAL SWPPP INSPECTION

(BACK TO ENVIRONMENTAL SECTION 12)

Item #	Item Description	YES	NO
1	Any visual signs of spills (oil, anti freeze, fuel, etc)		
2	Pot holes or other parts of the yard where spills could enter the ground		
3	FREE from vehicle fluid spills, free of products and used to absorbent material?		
4	Batteries are NOT stored outside and being properly disposed of?		
5	Source Control (SC) BMPs listed in Section 4.1.1, of the SWPPP are being performed?		
6	Parking area is FREE of Pot Holes, and cracks to prevent spills from seeping in the ground?		
7	Fuel Pumps are NOT LEAKING and Sump is FREE of Product in it?		
8	Equipment Service Employees are MANNING the dispenser at ALL TIMES during bus/vehicle fueling?		
9	Chemicals are STORED when NOT in USE?		
10	Materials for Toilets and other cleaning are in GOOD CONDITION and Stored When NOT in USE?		
11	Chemicals and regulated wastes are being stored inside (except Used Oil AST, Diesel Fuel AST)?		
12	Containers and Pans used for changing oils in buses/vehicles are in GOOD CONDITION and PROPERLY STORED?		
13	Spill Kit for Wash Facility SERVICEABLE AND FULLY STOCKED?		
14	Spill Kit for Vehicle Maintenance Shop is SERVICEABLE AND FULLY STOCKED?		
15	Used Oil Filters are PROPERLY STORED and the waste locker is FREE of leaks?		

16	Buses/Vehicles being washed <u>ARE INSIDE</u> the facility when being washed/rinsed?		
17	Toilet Chemicals are <u>PROPERLY STORED</u> when not in use?		
18	ALL Repairs are being conducted within the shop building confinements?		
19	Shop Floors are Being Swept Daily and materials properly disposed of?		
20	Shop Floors and surrounding area are FREE of spills or spill is cleaned with PIG Blankets?		
21	Downspouts are diverting stormwater from confines of the Maint Shop?		
22	Are batteries being properly stored?		
23	Is the Maintenance Break room clean and free of waste material that could pollute?		
24	Are the Wash Rack Facility Inside wash bays and offices/break rooms clean and free of debris, chemicals, and other trash?		
25	Are used parts and other debris properly stored around the shop area?		
26	Is the area surrounding the wash rack near dumpster(s) free of debris, or other contaminants that can pollute?		
27	Is the Used Oil Filter container in good repair and not overflowing?		
28	Is the Pressure Wash Area free of chemicals, acids that can contaminate the area?		
29	Are parts and other items stored in the warehouse properly stored and no hazardous materials being stored?		
30	Are gasoline, oils and etc, for facility maintenance being properly stored and in flammable lockers?		
31	Are chemicals and cleaning supplies in Operations Building properly stored		

ATTACHMENT 7 - INSURANCE CERTIFICATES CHECKLIST

(BACK TO RISK SECTION)

	CURRENT	NAME OF VENDOR	EXPIRES	DOLLAR LIMITS
	Tire Supplier	Michelin	1/1/2020	GL 5m AI 4m WC 1m
1	Parts Supplier(S)	Halco Industries	3/10/2020	GL 2m AL 1m WC 1m
2	Parts Supplier(S)	Lawson Products	3/1/2020	GL 2m AL Not Listed
3	Parts Supplier(S)	Barbosa Auto Diesel	11/9/2019	GL 1m AL Not Listed
4	Parts Supplier(S)			
1	Fuel Supplier(S)	Mansfield Oil Company	7/1/2020	GL 2m AL 1m WC Not
2	Fuel Supplier(S)			
	Battery Recycler	Thach Battery Inc	2/1/2020	GL 3m AI 1m WC
1	Construction	Atlantis Plumbing	1/1/2020	GL 2m AL 1m WC
2	Construction	LMI Systems Inc	11/1/2019	GL 3m AL 1m WC 1m
3	Construction	Fire Systems Inc	5/31/2020	GL 2m AL 1m WC Not
4	Construction			
5	Construction			
1	Temp Services	N/A		
2	Temp Services			
3	Temp Services			
1	Towing Services	All Peachtree Towing & Recovery	6/24/2020	
2	Towing Services			
	Welding Services	Capitol City Machine Shop	6/15/2020	
	Security Services	Ackerman Security Systems	12/31/2019	
	Waste Oil Recyclers	Safety Kleen	11/1/2019	

1	1. Major Overhauls	WW Williams	8/22/2020	
2	2. Major Overhauls	Cummins	12/1/2019	
	Engineering Services	Remtech Engineers		
1	Bus Line Subcontractor	Abbott Bus Lines	4/1/.2020	5m
2	Bus Line Subcontractor	New Orleans Tours	5/1/2020	5m
3	Bus Line Subcontractor	Dynamic Tours	12/20/2019	5m
4	Bus Line Subcontractor	Miller Transportation	10/20/2020	5m
5	Bus Line Subcontractor	Premier Transportation	5/1/2020	5m
6	Bus Line Subcontractor			
7	Bus Line Subcontractor			
8	Bus Line Subcontractor			
9	Bus Line Subcontractor			

ATTACHMENT 8A – PERMITS & CARRIER DOCUMENTS CRITERIA

(BACK TO RISK ACCOUNTING 15)

Item #	Name of Permit /Carrier Document	CURRENT	COMMENTS
1	FMCSA ASSIGNMENT OF DOT NUMBER DISPLAYED ON BOTH SIDES OF VEHICLES		
2	Removed		
3	FMCSA PASSENGER PERMIT (SM should be able to produce)		
4	FMCSA CHARTER PERMIT (SM should be able to produce)		
5	Removed		
6	STATE DOT UNIFIED CARRIER REGISTRATION		
7	LIABILTY INSURANCE CARD		
8	INTERNATIONAL FUEL TAX AGREEMENT (IFTA)		
9	INTERNATIONAL REGISTRATION APPORTION CARD		
10	COPY OF DOT ANNUAL INSPECTION		
11	IL LICENSE PLATE CURRENT IN VEHICLE, IF APPLICABLE		
12	Removed		
13	Removed		
14	IFTA STICKER ON WINDOW (CURRENT YR)		
15	Removed		

QUALIFICATION FILE (DQF) CRITERIA

Return to Primary Checklist

INSPECTIONS ITEMS	
1	Application for employment completely filled out per Part 391.21?
2	Removed.
3	Is there 10 years of work history noted with no unexplained gaps?
4	Is there a MVR check in all States where driver held a license going back three years?
5	Are there previous employer's information going back three years? (<u>Hired after 10/30/2004.</u>) Info should be retained in safety performance file.
6	Is there a copy of the CDL (<u>front and back</u>)?
7	Is there a certificate of road test or CDL equivalent per Part 391.33
8	Was an annual review of driving record completed?
9	Is there a certificate of violations?
10	Is there verification in the file that the physician that medically qualified the driver (original and renewal) is listed on the National Register of Qualified Medical Examiners?
11	Has a new MVR been order within 15 day of a new driver medical (original and renewal) to verify that the medical update was received by the State Agency?
12	Is there a current driver's physical exam certification with MRO certification? Certification should be for a maximum of 2 years per company policy. Exception would be for a 3 or 6 month certification due to elevated BP
13	Did operator receive entry-level driver training certification? (<u>hired after 10/2004</u>) Info should be retained in safety performance file
14	Is there a copy of the negative pre-employment drug screen?
15	Is there a request for previous employer's drug/alcohol testing info going back 3-years? (Applicants hired AFTER 10/30/2004.)

ATTACHMENT 10B - DRIVER QUALIFICATION FILE (DQF) MATRIX

RETURN TO DQF SECTION

#	OPERATOR'S NAME	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	REMARKS
1																	
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	
11																	
12																	
13																	
14																	
15																	

X = PROBLEM IN THIS DQF BASED ON CRITERIA LISTED IN PREVIOUS PAGE

ATTACHMENT 12 - MOTORCOACH OPERATOR'S LOG AUDIT

BACK TO HOS SECTION 47

OPERATOR: See Top 10 Violators Report – Attached	EMPLOYEE NO:
---	---------------------

PROBLEM	VIOLATION	DATES/REMARKS
	MISSING LOGS	
	DATES MISSING OR DUPLICATES	
	MILES DRIVEN EACH DAY	
	NAME OF CARRIER (NORMALLY PRE-PRINTED)	
	UNIT NUMBER OR PLATE	
	OPERATOR'S SIGNATURE	
	OPERATOR'S EMPLOYEE NUMBER	
	HOME TERMINAL ADDRESS (NORMALLY PRE-PRINTED)	
	CHARTER OR SCHEDULE NUMBER	
	GRAPH GRID INCOMPLETE	
	IMPROPER ABBREVIATION ON CITY (CITY MUST BE SPELLED OUT)	
	24 HOURS INCORRECTLY ACCOUNTED	
	ILLEGIBLE REMARKS	
	TOTAL HOURS COLUMN INCORRECT	
	RECAP – DAILY RECAP MISSING OR INCORRECT	
	RECAP – TOTAL HOURS DRIVING INCORRECT	
	RECAP – TOTAL HRS ON-DUTY LAST 8 DAYS WRONG	
	RECAP – TOTAL HRS ON-DUTY LAST 7 DAYS WRONG	

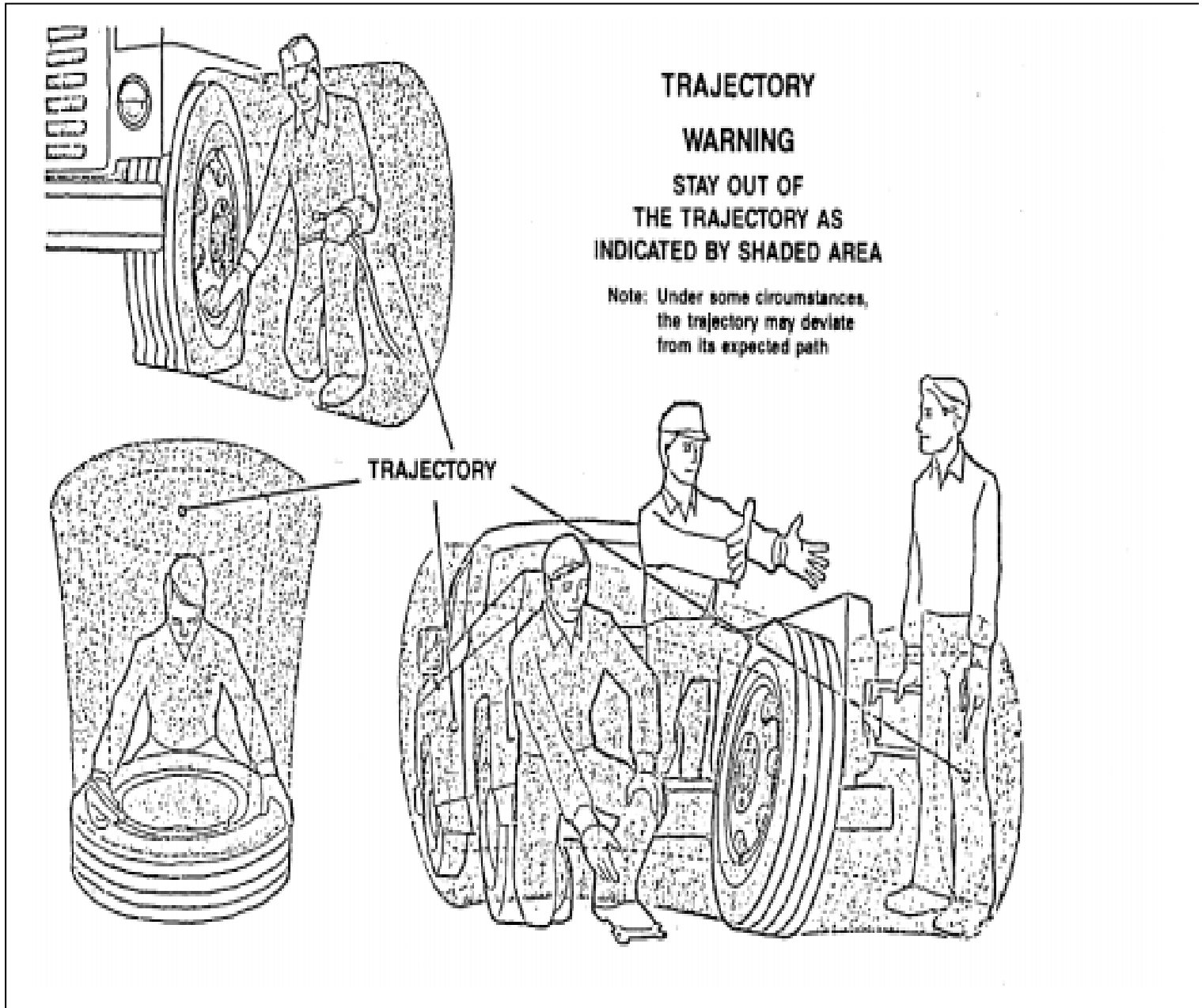
	ELIGIBLE HOURS TOMORROW WRONG OR MISSING	
	VIOLATION CODE – DRIVING WRONG OR MISSING	
	VIOLATION CODE – TOTAL HOURS ON-DUTY WRONG OR MISSING	
	10 HOUR VIOLATION	
	15 HOUR VIOLATION	
	70 HOUR VIOLATION (8 DAYS)	
FALSIFICATION		
	EXCESSIVE AVERAGE SPEED	
	ON-DUTY VS DRIVING FALSE	
	ON-DUTY – SHOWN AS OFF-DUTY	
	MISMATCHED LOCATIONS – > 50 MILES	
	MISMATCHED LOCATIONS – < 50 MILES	
	MISMATCHED TIMES – > 1 HOUR	
	MISMATCHED TIMES – < 1 HOUR	
	OTHER COMPENSATED WORK SHOWN AS OFF-DUTY	
	ENTRIES NOT MADE BY OPERATOR	
	OFF-DUTY LOCATION VS ON-DUTY LOCATION DIFFER	
	OTHER – MISSING PRE-TRIP INSPECTION	
	OTHER – MISSING POST TRIP INSPECTION	
	OTHER – MISSING HOTEL REST PERIOD (FOR 8 HOURS REST)	
	OTHER – PAY RECORDS AND LOGS DO NOT MATCH	
	OTHER – MISSING STATE LINE MILEAGE (CHARTERS ONLY)	

ATTACHMENT 14 – DRUG AND ALCOHOL PROGRAM AUDIT

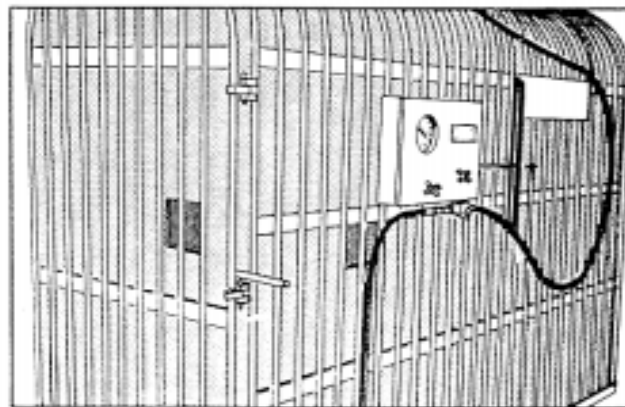
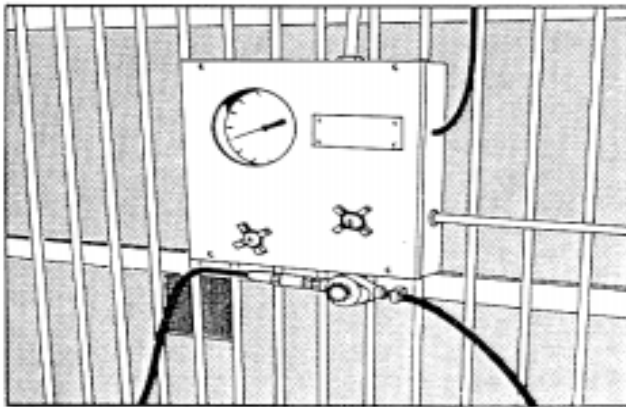
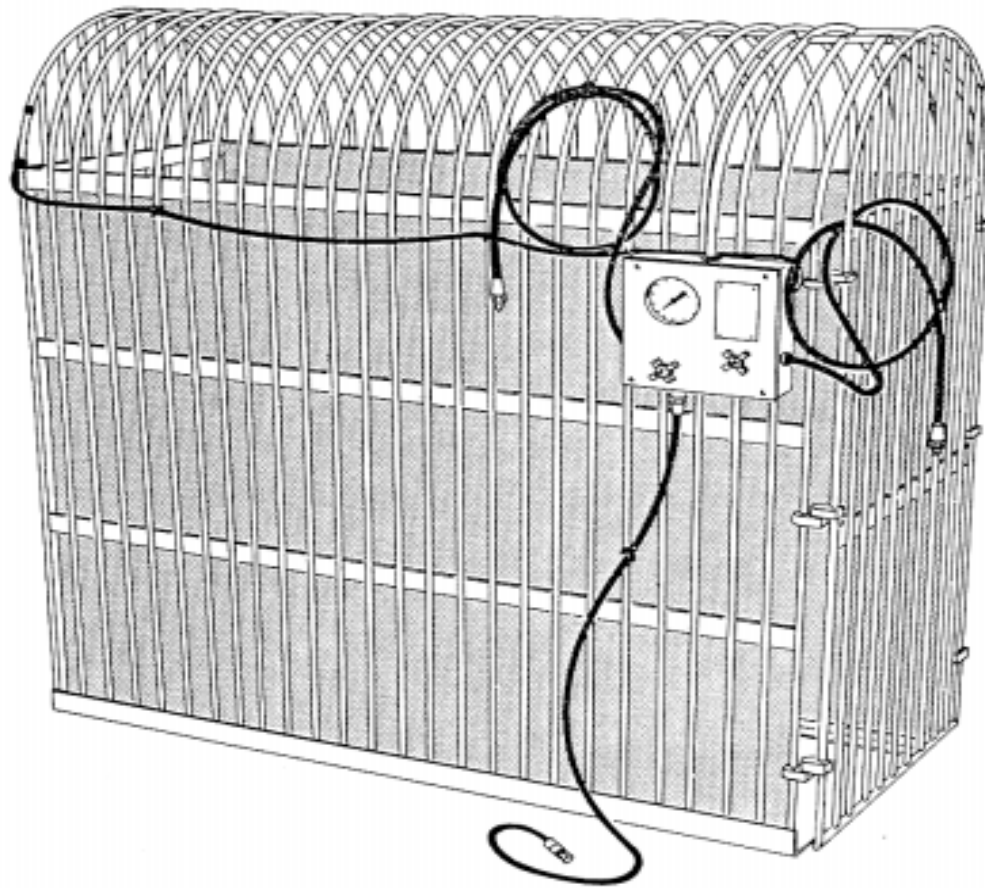
RETURN TO DRUG & ALCOHOL SECTION

25	DESCRIPTION OF ITEM	REMARKS
	Are drug and alcohol testing records for current and prior year being maintained?	
	Is the Company achieving goal of 50% random drug analysis being conducted?	
	Is the Company achieving goal of 10% random alcohol testing being conducted?	
	Does the company have drug and alcohol policy?	
	Have all DOT and Non-DOT employees received a copy of the drug/alcohol policy?	
	Are all employees pre-employment tested for drugs prior to hiring?	
	Have supervisors been trained on Reasonable Suspicion?	
	Are positive results for CMV Operator's reported State DPS if applicable?	
	Are positive results maintained on-file for 5-years after testing?	
	Have primary and alternate substance abuse representatives been trained?	

ATTACHMENT 17 - TRAJECTORY



ATTACHMENT 18 - TIRE INFLATOR CAGE



ATTACHMENT 19 – VEHICLE MAINTENANCE SHOP SAFETY CHECKLIST

RETURN TO MAINTENANCE MANAGEMENT SECTION

NMBR	DESCRIPTION OR REQUIREMENT	YES	NO	N/A
1	Are doors, passageways, or stairs, which could be mistaken as an exit or a way to exit clearly marked "NOT AN EXIT" or by a sign, indicating actual use, such as "storage room" or "basement"?			
2	Are areas around exit doors and passageways free of obstructions?			
3	Are locks or fastening devices, which would slow or prevent escape from inside the building, prohibited?			
4	Is clear, unrestricted access maintained to on-off power control switches and stations?			
5	Where compressed air is used for cleaning, is the discharge end of the airline restricted to less than 30 PSI?			
6	Are tools not in use kept in suitable metal or fabric containers?			
7	Are vehicle maintenance operations, such as painting, welding, battery work, and wheel and tire maintenance operations performed in separate parts of the facility to prevent operations of one kind from			
8	Is the use of any flammable liquid for cleaning shop floors prohibited?			
9	Are signs posted where smoking is prohibited in the shops?			
10	Are workers prohibited from leaving electrical cords and air hoses on the shop floor when not in use?			
11	Are shop entrances and exits clearly marked and posted with appropriate traffic control signs to prevent mishaps at these locations?			
12	Are workers prohibited from storing fuel-contaminated clothing in lockers or other confined areas?			
13	Removed			
14	Are procedures in effect to ensure proper containment measures are available to prevent environmental pollution in the event of a spill?			
15	Are the storage, use, and handling of flammable and combustible liquids accomplished according to OSHA Standard and local fire department requirements?			
16	Removed			
17	Does the supervisor ensure personnel are trained annually on the location, selection, and use of fire extinguishers, electrical power disconnecting locations, alarm systems, evacuation procedures, and			

18	Is at least 50 foot-candles of illumination maintained at each work position?			
19	Removed			
20	Are vented lockers and emergency eyewash provided for workers who may be contaminated with solvents, fuels, or toxic material?			
21	Are workers trained and do they practice proper manual lifting and carrying techniques in their job to avoid injuries?			
22	Is proper personal protective equipment (PPE) for all jobs or tasks identified, available, and worn by workers?			
23	Are workers prohibited from wearing metal rings, watches, bracelets, or other jewelry when they are engaged in battery maintenance? Do they secure metal eyeglasses by a band or cord?			
24	Are all ignition sources prohibited in the vicinity of batteries to prevent ignition of explosive gases produced by batteries?			
25	Are safe battery jump starting procedures used?			
26	Are battery chargers always turned off before a battery is connected or disconnected?			
27	Are carboy filters or siphons provided and used for handling battery electrolyte?			
28	Is acid always poured INTO water when servicing batteries to prevent reaction and splattering?			
29	Is the practice of using compressed air to clean clothing or the body prohibited?			
30	Are all compressed gas cylinders marked, stored, and handled according to instructions and standards?			
31	Do operators using hydraulic vehicle lifts ensure vehicle doors, hood, and trunk are closed, no one is inside the vehicle, and all people and obstructions are clear of the vehicle prior to lifting it?			
32	Are workers using jack stands when working under vehicles that are lifted with bottle jacks, hydraulic floor jacks? Is the Coach America policy adhered to?			
33	Do workers block wheels and place axle or frame stands on both sides to support the vehicle before repair operations are begun?			
34	Are all tire and wheel maintenance workers qualified			
35	Does the tire and wheel maintenance supervisor ensure the use of restraining devices for servicing multi-piece rim wheels?			
36	Are current OSHA tire charts, rim manuals, and applicable technical manuals available to ensure extensive damage to equipment and serious or fatal injuries to personnel are prevented?			

37	Are tires on multi-piece rim wheels completely deflated by removing the valve core before the rim wheel is removed from the axle?			
38	When reinflation of tires installed on multi-piece rims is approved for tires already mounted on the vehicle, are safeguards used to encase the wheel (chains, remote control inflation equipment, etc.)?			
39	Are air hoses for inflating tires long enough to allow the employee to stay outside the trajectory?			
40	Removed			
41	Do vehicle operators and mechanics sound vehicle horns before backing, intermittently during backing (unless vehicle is equipped with backup alarms), and prior to entering or leaving the			
42	Do vehicle operators, and mechanics ensure roll down or side sliding doors are completely opened before a vehicle enters or exits the maintenance shop?			
43	Do workers remove all items of jewelry before working on or around shop equipment or vehicles?			
44	Are all new or used gas tanks, oil barrels, or drums purged and inerted before any welding or cutting is attempted?			
45	Are hot pressurized radiators allowed to cool before they are opened			
46	Are vehicles with leaking fuel tanks or excessive oil leaks removed from the parking lot into the garage area for repairs?			
47	Are open flame and spark-producing devices kept at least 25 feet from the refueling maintenance shop?			
48	Are refueling vehicle tank pumping systems, filter separator, and the tank cleaned out and purged prior to performing major maintenance on the main tank?			
49	Are vehicle maintenance repair pits guarded?			
50	Is the monthly inspection being performed And documented by the supervisor on permanently Installed showers?			
51	Are sufficient metal or noncombustible containers with self-closing lids for the disposal of combustible wastes, soiled rags, and other flammable materials provided?			
52	Are these containers marked according to the requirements and are contents disposed of according to approved hazardous waste disposal procedures?			
53	Are properly marked, covered metal containers used for storing oily rags used in the maintenance area?			
54	Are eye and face protections being provided where there are hazards from flying objects, dust, vapors, glass, radiation, splashing, or any combination of these?			

55	Is material being drilled secured with a hold-down fixture or stock vise to prevent movement?			
56	Are grinding machines designed for fixed locations securely fastened to a suitable foundation and all unwanted movement eliminated?			
57	Are only qualified personnel engaged in or exposed to welding, cutting, or brazing activities and are personnel engaged in these Activities using protective equipment to include eye/face protection, head, foot, body, arm, and hand protection?			
58	Is protective clothing/equipment available and used by machine shop personnel?			
59	Are machine shop floors kept free of slippery substances, metal chips, scraps, etc?			

ATTACHMENT 20 - GLOSSARY OF REFERENCES AND SUPPORTING INFORMATION

- 1 NFPA 34, Chapter 8, *Dipping and Coating Processes Using Flammable or Combustible Liquids*
- 2 NFPA 70, *National Electrical Code (NEC)*
- 3 NFPA 80, *Standard for Fire Doors and Windows*
- 4 NFPA 86A, *Ovens and Furnaces Design, Location, and Equipment*
- 5 NFPA 91, *Blower and Exhaust Systems for Dust, Stock, and Vapor Removal or Conveying*
- 6 NFPA 101, *Code for Safety to Life from Fire in Buildings and Structures Abbreviations*
- 7 National Electrical Code (NEC) Article 511, *Commercial Garages, Repair, and Storage*
- 8 NEC Article 513, *Aircraft Hangars*
- 9 NEC Article 480, *Storage Batteries*
- 10 NEC Article 500, *Hazardous (Classified) Locations*
- 11 Occupational Safety and Health Administration (OSHA) 29 Code of Federal Regulations (CFR) 1910
- 12 Subpart 0, *Machinery and Machine Guarding*
- 13 OSHA 29 CFR 1910, Subpart P, *Hand and Portable Powered Tools and Other Hand-Held Equipment*
- 14 OSHA 29 CFR 1910.37, *Means of Egress, General*
- 15 OSHA 29 CFR 1910.101, *Compressed Gases*
- 16 OSHA 29 CFR 1910.102, *Acetylene*
- 17 OSHA 29 CFR 1910.103, *Hydrogen*
- 18 OSHA 29 CFR 1910.104, *Oxygen*
- 19 OSHA 29 CFR 1910.105, *Nitrous Oxide*
- 20 OSHA 29 CFR 1910.106, *Flammable and Combustible Liquids*
- 21 OSHA 29 CFR 1910.107, *Spray Finishing Using Flammable and Combustible Liquids*
- 22 OSHA 29 CFR 1910.178, *Powered Industrial Trucks*
- 23 OSHA 29 CFR 1910.243, *Guarding of Portable Powered Tools*
- 24 OSHA 29 CFR 1910.304, *Wiring Design and Protection*
- 25 OSHA 3067, *Concepts and Techniques of Machine Safeguarding*
- 26 OSHA Chart, *Demounting and Mounting Procedures for Truck and Bus Tires*
- 27 OSHA Chart, *Multi-piece Rim Matching Chart*
- 28 Tire and Rim Association, Inc., *Rim Manual*

ATTACHMENT 5



COACH USA, INC.'S DRUG AND ALCOHOL POLICY

September 2018
Updated 8/3/2021

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In accordance with the Regulations of the U.S. Department of Transportation, the Federal Motor Carrier Safety Administration, and the Federal Transit Administration (49 CFR Parts 40, 382, and 655)

COACH USA, INC.'S DRUG AND ALCOHOL POLICY

1.0 Policy

Coach USA, Inc. and its subsidiaries (collectively referred to throughout this policy as "Coach USA" or "Company") are dedicated to providing safe, dependable, and economical bus service. Employees are our most valuable resource. It is our policy: (1) to take appropriate action to assure that employees are not impaired in their ability to perform assigned duties in a safe, productive, and healthy manner; (2) to foster and maintain a drug and alcohol - free environment for all employees and patrons; (3) to prohibit the unlawful manufacture, distribution, dispensation, possession, or use of controlled substances; and (4) to encourage employees to voluntarily seek professional assistance whenever personal problems, including alcohol or drug use, may adversely affect their ability to perform their assigned duties.

To achieve the goal of a substance-free workplace, this policy incorporates three integrated components:

Prevention through education and training:

Education and training will communicate and clarify this policy to all employees, assist employees in recognizing substance abuse problems and in finding solutions to those problems.

Detection, deterrence and enforcement:

Regulations promulgated by the U.S. Department of Transportation ("DOT"), the Federal Transit Administration ("FTA"), and the Federal Motor Carrier Safety Administration ("FMCSA") **and Company policy** require that all safety-sensitive employees will be subject to reasonable suspicion, post-accident, random, return to duty and follow up drug and alcohol testing. Applicants for safety-sensitive positions will not be eligible for those positions unless they pass a pre-employment drug test. **As a "zero tolerance" employer, any positive drug or alcohol test as defined by the DOT, FMCSA and the FTA, or refusal to test will result in a termination of employment.**

Treatment and opportunities for rehabilitation:

Alcohol and drug abuse are recognized as diseases that can be treated. Coach USA promotes a voluntary rehabilitation program to encourage employees to seek professional assistance prior to testing positive for drugs or alcohol, without fear of discipline.

Approved: Jason Louis

Jason Louis, Vice President of Safety

Date: September 6, 2018

2.0 Purpose

The purpose of this policy is to assure worker fitness for duty and to protect our employees, passengers, and the public from the risks posed by the use of alcohol and use of prohibited drugs (as defined below). This policy is also intended to comply with all applicable Federal regulations governing workplace anti-drug programs in the transportation industry.

The FTA and the FMCSA of the DOT have enacted 49 CFR (Code of Federal Regulations) Parts 655 and 382, which mandate urine drug testing and breath alcohol testing for employees performing safety-sensitive functions. These regulations also prevent performance of safety-sensitive functions when there is a positive test result or a test refusal. The DOT has also adopted 49 CFR Part 40, which outlines procedures for transportation workplace drug and alcohol testing programs. This Policy incorporates these federal requirements for employees performing safety-sensitive functions, as well as other requirements.

In addition, DOT has published 49 CFR Part 29, implementing the Drug-Free Workplace Act, which requires the establishment of a drug-free workplace policy and the reporting of certain drug-related offenses to the FTA. California passed a similar version of the federal law, the Drug-Free Workplace Act of 1990 (Gov't Code § 8350 *et seq.*).

This policy reiterates the requirements of the Federal regulations. **Portions of this policy marked in bold are not necessarily FTA or FMCSA-mandated, but reflect the Company's employment policy (this does not include policy headings).**

If any provision of an existing Company policy or rule is inconsistent or in conflict with any provision of this policy or the DOT/FTA/FMCSA rules, this policy and the DOT/FTA/FMCSA rules shall take precedence; if any provision of this policy is inconsistent or in conflict with the DOT/FTA/FMCSA rules, then the DOT/FTA/FMCSA rules shall take precedence.

3.0 Applicability

Safety-Sensitive Employees

This policy applies to all safety-sensitive employees, including paid part time employees who perform or could be called upon to perform any transportation related safety-sensitive function, and this includes off-site lunch periods or breaks when an employee is scheduled to return to work.

Under the FTA regulations, a safety-sensitive function is any of the following duties:

- 1) The operation of a transportation revenue service vehicle even when the vehicle is not in revenue service. The operation of a non-revenue service vehicle by an employee when the operation of such a vehicle requires the driver to hold a Commercial Driver's License (CDL).
- 2) Maintaining (including repairs, overhaul and rebuilding) a revenue service vehicle or equipment used in revenue service.
- 3) Controlling dispatch or movement of a revenue service vehicle.
- 4) Carrying a firearm for security purposes. (Not applicable to CUSA)
- 5) Volunteers are considered a covered employee if; 1) they are required to hold a commercial driver's license to operate the vehicle; or 2) if the volunteer receives remuneration in excess of their actual expenses incurred while engaged in the volunteer activity. (Not applicable to CUSA)

The FMCSA regulations mandate the following:

Drivers holding a CDL are considered to be performing a safety-sensitive function during any period in which the driver is actually performing, ready to perform, or immediately available to perform any safety-sensitive function. Safety-sensitive functions include:

- 1) All time at an employer or shipper plant, terminal, facility, or other property, or on any public property, waiting to be dispatched, unless the driver has been relieved from duty by the employer;
- 2) All time inspecting parts and equipment or otherwise inspecting, servicing, or conditioning any commercial motor vehicle at any time;
- 3) All time spent at the driving controls of a commercial motor vehicle in operation;
- 4) All time, other than driving time, in or upon any commercial motor vehicle except time spent resting in a sleeper berth;
- 5) All time loading or unloading a vehicle, supervising, or assisting in the loading or unloading, attending a vehicle being loaded or unloaded, remaining in readiness to operate the vehicle, or in giving or receiving receipts for shipments loaded or unloaded; and
- 6) All time repairing, obtaining assistance, or remaining in attendance upon a disabled vehicle.

Under Company policy, a safety-sensitive function is any of the following duties:

- 1) **The operation of a transportation revenue service vehicle even when the vehicle is not in revenue service.**
- 2) **The operation of a non-revenue service vehicle by an employee when the operation of such a vehicle requires the driver to hold CDL.**
- 3) **Maintaining (including repairs, overhaul and rebuilding) a revenue service vehicle or equipment used in revenue service.**
- 4) **Controlling dispatch or movement of a revenue service vehicle.**

Contractors

Contractors who perform any of the safety-sensitive functions (Defined by FTA or FMCSA depending on the type of contract) described in this policy will be subject to the same requirements as safety-sensitive employees.

Non Safety-Sensitive Positions

All employees are subject to the provisions of the Drug-Free Workplace Act of 1998, and should refer to the Company's Drug Free Workplace Policy Statement, attached to this policy as Exhibit A. Additionally, visitors, vendors and contracted employees on Company premises will not be permitted to conduct transportation business if found to be in violation of Company's Drug Free Workplace Policy Statement.

4.0 Opportunities for Rehabilitation (Company Policy)

To promote a drug and alcohol free workplace, this policy includes a rehabilitation program that allows employees to voluntarily come forward to request rehabilitation.

Voluntary Rehabilitation (Company Policy)

Any employee who has a drug and/or alcohol abuse problem and has not been selected for reasonable suspicion testing, random or post-accident testing or has not refused a drug or alcohol test may voluntarily refer her or himself to the General Manager or the Human Resource Department, who will refer the individual to the Company's Employee Assistance Program and/or a Substance Abuse Counselor for a Non-DOT evaluation and treatment. Voluntary self-referral commits the employee to a therapeutic process. Confidentiality of the employee will be protected. The Counselor will evaluate the employee and make a specific recommendation regarding the appropriate treatment. When an employee voluntarily refers her or himself for treatment, the employee may be eligible for sick leave and disability benefits. Employees will be allowed to take accumulated vacation time or may be eligible for unpaid time off to participate in any prescribed rehabilitation program. Employees are encouraged to voluntarily seek professional substance abuse assistance before any substance use or dependence affects job performance.

While Undergoing Treatment (Company Policy)

Any covered employee who admits to a drug and/or alcohol problem will immediately be removed from his/her safety-sensitive function and will not be allowed to perform such function until successful completion of a prescribed rehabilitation program is completed. The employee may be placed on an unpaid leave of absence to allow time for completion of the treatment/rehabilitation program. Proof of completion must be provided in writing by a valid professional. The employee will be required to pass a Non-DOT drug and alcohol test before he/she can perform a safety-sensitive function.

*The Company shall make every effort to place the employee back in his/her position upon returning to work. However, an employee's commitment to undergo rehabilitation treatment does not guarantee that the employee's job will be available upon return.

Cost of Rehabilitation (Company Policy)

All associated costs for treatment are the sole responsibility of the employee.

Returning to Work after Treatment (Company Policy)

All Safety Sensitive employees who successfully complete prescribed treatment and are allowed to return back to work will have to take a DOT Return to Duty test and receive a verified negative result AND be subject to follow-up testing as prescribed by the treating Substance Abuse Professional (SAP). These follow-up tests will be performed under direct observation.

All Non-safety sensitive employees who successfully complete prescribed treatment and are allowed to return back to work will have to take a Non-DOT Return to Duty test and receive a verified negative result AND be subject to follow-up testing as prescribed by the treating Substance Abuse Professional (SAP). These follow-up tests will be performed under direct observation.

5.0 Prohibited Behavior and Conduct

“Prohibited substances” addressed by this policy include the following:

5.1 Prohibited Drug Use

FTA and FMCSA regulations specifically prohibit the use of the following illegal, prohibited substances and require testing for their presence under certain circumstances: Marijuana, Amphetamines, Opioids, Phencyclidine (PCP) and Cocaine (“Prohibited Drugs”). **Safety-sensitive employees may be tested for prohibited drugs at any time while on duty or on Company property.**

Even in States where recreational and/or medical use of Marijuana is legal, it remains unacceptable for any safety-sensitive employee subject to drug testing under this Policy and/or the DOT’s drug testing regulations to use Marijuana.

The DOT’s Drug and Alcohol Testing Regulation – 49 CFR Part 40, at 40.151(e) – does not authorize “medical Marijuana” under a State law to be a valid medical explanation for a transportation employee’s positive drug test result. Therefore, Medical Review Officers will not verify a drug test as negative based upon information that a physician recommended that the employee use “medical Marijuana.”

5.2 Prohibited Alcohol Use

The consumption of beverages containing alcohol, or substances including any medication such that alcohol is present in the body while performing safety sensitive duties or transportation business, is prohibited. “Alcohol” means the intoxicating agent in beverage alcohol, ethyl alcohol or other low molecular weight alcohols including methyl or isopropyl alcohol. (The concentration of alcohol is expressed in terms of grams of alcohol per 210 liters of breath as measured by an evidential breath testing device.)

5.3 Legal Drugs (Company Policy)

Marijuana use is prohibited under Company Policy even if your State has legalized it for recreational or medical purposes. Except for Marijuana use, the appropriate use of legally prescribed drugs and non-prescription medications is not prohibited. However, the use of any substance which carries a warning label that indicates that mental functioning, motor skills, or judgment may be adversely affected MUST be reported to your Designated Employer Representative or Safety Manager. Medical advice should be sought, as appropriate, while taking such medication and before performing safety-sensitive duties.

Any time an employee comes forward about a medication that he/she is taking, the information must be forwarded to the Vice President of Safety for clarification and review. Consultation with the Medical Review Officer (MRO) may occur to determine if the medication is appropriate to take while performing a safety-sensitive function.

A legally prescribed drug means that the employee has a prescription or other written approval (in his/her name) from a physician for the use of a drug in the course of medical treatment. The misuse of legal drugs while performing a safety-sensitive function is prohibited at all times.

In order to continue performing a safety-sensitive function, the employee taking the medication will be required to provide the following:

A written letter from the prescribing physician stating the patient's name, the name of the substance, the period of authorization and a statement that the medication will not adversely affect the employee's performance to drive or perform his/her safety sensitive function and that the employee may continue to perform his/her safety-sensitive function while taking such medication. The letter must be signed and dated by the physician and the letter will be provided to the MRO for final approval.

If the MRO determines that the medication being taken is not appropriate to take while performing a safety-sensitive function, the employee will remain off duty until the issue is cleared by the MRO. Final determination rests with the MRO.

6.0 Prohibited Conduct: Manufacture, Trafficking, Possession, and Use of Controlled Substances

The manufacture, distribution, dispensation, possession, or use of controlled substances in the workplace is prohibited. A "controlled substance" is any illegal drug or any substance identified in Schedules I through V of Section 202 of the Controlled Substances Act (21 U.S.C. § 812), and as further defined by 21 CFR 1300.11-1300.15.

Please note that, regardless of whether medical or recreational Marijuana use is legal in the State in which you live or work, Marijuana remains a drug listed in Schedule I of the Controlled Substances Act. Therefore, the manufacture, distribution, dispensation, possession, or use of Marijuana in the workplace is prohibited. Further, it remains unacceptable for any safety-sensitive employee subject to drug testing under this policy and/or the federal drug testing regulations to use Marijuana, even when off duty.

Any employee engaging in the manufacture, distribution, dispensation, possession or use of a controlled substance on Company premises will be subject to disciplinary action, up to and including termination. Law enforcement shall be notified, as appropriate, where criminal activity is suspected.

6.1 Requirement to Submit to Drug and Alcohol Testing

Every covered employee who performs a safety-sensitive function as described in the FTA regulations Part 655 and the FMCSA regulations Part 382 is required to submit to post-accident, random, and reasonable suspicion drug and alcohol testing- and to pre-employment drug testing- as described in this policy. The Company shall not permit any employee who refuses to submit to such tests to perform or continue to perform any safety-sensitive functions.

6.2 Alcohol Use/Hours of Compliance

No safety-sensitive employee should report for duty or remain on duty when his or her ability to perform assigned functions is adversely affected by alcohol.

The FMCSA regulations require that if a safety-sensitive employee's alcohol concentration is 0.02 -0.039, that employee is not permitted to resume safety-sensitive functions for 24 hours.

The FTA regulations require that if a safety-sensitive employee tests at 0.02 -0.039, s/he cannot work until the next scheduled duty period, but not less than 8 hours from the time of the test.

If a safety sensitive employee's alcohol concentration is 0.02 -0.039, s/he is subject to disciplinary action, up to and including termination.

Under both FTA and FMCSA regulations, if a safety-sensitive employee tests at 0.04 or greater, or refuses to test, immediate removal from safety-sensitive functions is required. **In this circumstance, under the Company's zero tolerance policy, the employee will be immediately removed from duty and referred to a Substance Abuse Professional (SAP) and terminated from employment.**

No employee shall use alcohol while on duty or while performing safety-sensitive functions. No employee shall have used alcohol within four hours prior to reporting for duty. After an accident, employees shall refrain from alcohol use for eight (8) hours or until an alcohol test has been administered, whichever occurs first.

No safety-sensitive employee shall use alcohol during the hours that they are on call.

6.3 Compliance with Testing Requirements

Any safety-sensitive employee who refuses to comply with a request for testing, who fails to remain readily available for post-accident testing, who provides false information in connection with a test, or who attempts to falsify test results through tampering, contamination, adulteration, or substitution, shall be removed from duty immediately. Refusal can include an inability to provide a specimen or breath alcohol sample without a valid medical explanation, as well as a verbal declaration, obstructive behavior, or physical absence resulting in the inability to conduct the test.

6.4 Refusal to Submit to a DOT Alcohol or Controlled Substance Test

As an employee, you have refused to take a drug or alcohol test if you:

- (1) Fail to appear for any test (excluding pre-employment) within a reasonable time, as determined by the employer, after being directed to do so by the employer.
- (2) Fail to remain at the testing site until the testing process is complete. For a pre-employment test, an employee who leaves the testing site before the testing process commences is not deemed to have refused to test.
- (3) Fail to provide a urine or breath specimen for any drug or alcohol test required by Part 40 or DOT agency regulations.
- (4) In the case of a directly observed or monitored collection in a drug test, fail to permit the observation or monitoring of your provision of a specimen.
- (5) Fail to provide a sufficient amount of urine or breath when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure. **It is Company policy that any employee that**

does not provide a valid specimen during a collection for a test will remain off duty until the employee is cleared by the MRO that the employee had a valid medical reason.

- (6) Fail or declines to take a second test the employer or collector has directed you to take.
- (7) Fail to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by the DER as part of the “shy bladder” or “shy lung” procedures.
- (8) Fail to cooperate with any part of the testing process (e.g., refuse to empty pockets or wash hands when so directed by the collector, behave in a confrontational way that disrupts the collection process).
- (9) If the MRO reports that there is verified adulterated or substituted test result.
- (10) Fail or refuse to sign Step 2 of the alcohol testing form.
- (11) Fail to follow the observer’s instructions during an observed collection including instructions to raise your clothing above the waist, lower clothing and underpants, and to turn around to permit the observer to determine if you have any type of prosthetic or other device that could be used to interfere with the collection process.
- (12) Possess or wear a prosthetic or other device that could be used to interfere with the collection process.
- (13) Admit to the collector or MRO that you adulterated or substituted the specimen.

As an employee, if you refuse to take a drug and/or alcohol test, you incur the same consequences as testing positive and will be immediately removed from performing any safety-sensitive functions, and referred to the Substance Abuse Professional.

6.5 Compliance with Treatment Requirements

All employees are encouraged to make use of the available resources for treatment for alcohol and substance abuse problems.

6.6 Notify Company of Criminal Drug Conviction

Every employee must notify the Company of any criminal drug statute conviction for a violation occurring in the workplace within five days after such conviction. Failure to do so shall subject the employee to disciplinary action up to and including termination.

6.7 Improper Application of the Policy

The Company is dedicated to assuring fair and equitable application of this “Zero Tolerance” Drug and Alcohol Policy. Therefore, supervisors and managers are required to use and apply all aspects of this policy in an unbiased and impartial manner. Any supervisor and manager who knowingly disregards the requirements of this policy, or who is found to deliberately misuse the policy with respect to subordinates, shall be subject to disciplinary action, up to and including termination.

7.0 Testing for Prohibited Substances

7.1 General

Testing shall be conducted in a manner to assure a high degree of accuracy and reliability and using techniques, equipment, and laboratory facilities which have been approved by the U.S. Department of Health and Human Services (DHHS). Testing for prohibited drugs and alcohol on safety-sensitive employees shall be conducted in accordance with the procedures set forth in 49 CFR Part 40. See attached Testing Procedures for detailed procedures on all required types of drug and alcohol testing.

Medical Review Officer (MRO)- All drug testing results shall be interpreted and evaluated by an MRO who meets all applicable requirements of Part 40, who shall be responsible for receiving laboratory results generated by an employer's drug testing program and has appropriate medical training to interpret and evaluate an individual's confirmed positive test result. The MRO shall comply with the drug testing procedures set forth in 49 CFR Part 40. The MRO will not review alcohol test results. When a confirmed positive test is reported from the testing laboratory, it is the responsibility of the MRO to:

(a) contact the employee and afford the employee the opportunity to discuss the test results with him/her within 36 hours; (b) review the individual's medical history, including any medical records and biomedical information provided; (c) determine whether there is a legitimate medical explanation for the result, including legally prescribed medication. The MRO shall not convey test results to the Company until the MRO has made a definite decision that the test result was positive or negative, or refusal to test. If the employee provides an adequate explanation, the MRO verifies the test as negative and no further action is taken. When the MRO reports the results of the verified positive test to the Company, the MRO will disclose the drug(s) for which there was a positive test. If the MRO declares a drug test to be invalid for any reason, the test is considered canceled, and neither positive nor negative. However, a re-collection under direct observation may be ordered by the MRO.

7.2 Testing for Prohibited Drugs

The Company shall collect or have collected urine samples from safety-sensitive employees to test for Prohibited Drugs. An assigned Collection Site will split each urine sample collected into a primary and a split sample. (See testing procedures) The urine samples will be sent under seal, with required chain of custody forms, to a laboratory certified by the DHHS. An initial drug screen will be conducted on each primary specimen. For those specimens that are not negative, a confirmatory Gas Chromatography/Mass Spectrometry (GS/MS) test will be performed. The test will be considered positive if the amounts present are at or above the minimum thresholds established in 49 CFR Part 40, as set forth in the attached Exhibit B (threshold levels of testing).

Split Specimen Testing- If the test result of the primary specimen is positive, the employee may request the MRO to direct his/her split specimen be tested in a different DHHS-certified laboratory. The MRO shall honor such a request if it is made within 72 hours of the employee having been notified of a verified positive or refusal to test result. This does not delay the Company from taking any action consistent with this policy for positive tests and the employee will be removed immediately from any safety-sensitive functions regardless if he/she is having his/her split specimen tested by a different laboratory. However, if the split

specimen (bottle B) produces a negative result, or for any reason the second portion is not available, the test is considered cancelled and no sanctions are imposed. However, a re-collection under direct observation may be ordered by the MRO.

Cancelled Test - A drug or alcohol test that has a problem identified that cannot be or has not been corrected, or which this part otherwise requires to be cancelled. A cancelled test is neither a positive nor a negative test.

7.3 Alcohol Testing

Tests for alcohol concentration on safety-sensitive employees will be conducted with a National Highway Traffic Safety Administration (NHTSA) -approved evidential breath testing device (EBT) operated by a trained breath alcohol technician (BAT). In order to maintain quality assurance, EBT's must be externally calibrated in accordance with the plan developed by the manufacturer of the device. If the initial test on an employee indicates an alcohol concentration of 0.02 or greater, a second test will be performed to confirm the results of the initial test. For summary of applicable alcohol threshold levels, see Exhibit B.

8.0 Types of Testing

49 CFR Parts 655 and 382 require the following types of testing for Prohibited Substances for safety-sensitive employees: Pre-employment or transfer, reasonable suspicion, post-accident, random, and return to duty.

8.1 Pre-employment, Transfer Testing or Return to Duty Testing

All applicants for safety sensitive positions shall undergo urine drug testing prior to employment. Receipt of a verified negative test result from the MRO is required prior to performing ANY safety sensitive functions for the first time. If an applicant or employee's drug test is cancelled or negative-dilute the employee or applicant shall be required to immediately take another pre-employment drug test.

Existing employees who are being considered for transfer to a safety-sensitive position from a NON-safety-sensitive position will be required to undergo a DOT pre-employment drug test. Any existing safety-sensitive employee who is simply transferring to a different depot (in the same company) for another safety-sensitive position is NOT required to undergo another DOT pre-employment drug test. This paragraph applies to employees transferring to another depot within a company with the same DOT number. The Company does not transfer employees between companies with different DOT numbers. When an employee moves from one company to another with a different DOT number, that employee is considered a new hire and must successfully complete all new hire requirements.

8.1.1 Return to Work after 30 Days (DOT-FMCSA Policy)

If the employee has a commercial license and has been out for 30 days or more AND the employee has been taken out of the random testing pool, the covered employee will be required to take a DOT pre-employment drug test and receive a verified negative result before he/she can return to his/her safety-sensitive position.

8.1.2 Return to Work after 90 Days (DOT-FTA Policy)

If a covered employee has not performed a safety-sensitive function for 90 consecutive calendar days regardless of the reason, AND the employee has not been in the random pool during that time, the employee will be required to take a DOT Pre-Employment drug test (NOT a return-to-duty) and receive a verified negative result before he/she can return to his/her safety-sensitive position.

8.1.3 Previous Employer Request Requirement

As an employer, we are required to verify previous violations of DOT drug and alcohol regulations within the last two years of employment with a DOT regulated agency or employer. Requests for the required information from a previous employer can be made through a variety of means, including mail (certified or not), fax, telephone, or email.

The DOT online clearinghouse must also be checked.

An employer must make a reasonable attempt to obtain and review the information listed below from any DOT-regulated employer the employee performed safety-sensitive functions for in the previous two years (FTA)/ three years (FMCSA). The information below must be requested, and if obtained, it must be reviewed prior to the first time an employee performs safety-sensitive functions. If not feasible, the information should be obtained no later than thirty (30) days after the first time an employee performs safety-sensitive functions. The information obtained must include:

1. Information on the employee's alcohol test in which a breath alcohol concentration of 0.04 or greater was indicated.
2. Information on the employee's controlled substance test in which a positive result was indicated.
3. Any refusal to submit to a required alcohol or controlled substance test (including verified adulterated or substituted drug test results).
4. Other violations of DOT agency drug and alcohol testing regulations.

Although Part 40 specifically requires that previous employers immediately provide a prospective or current employer with appropriate drug and alcohol testing information, a previous employer's refusal or failure to provide the requested information will not, in and of itself, disqualify the applicant or employee from employment. Because of the potential for previous employer(s) to refuse or fail to respond, it is important to keep records of all communication or correspondence with the previous employer to demonstrate that a good faith attempt was made to obtain the required information.

As the applicant or employee, if you have violated any of the DOT drug and alcohol regulations, you must also obtain documentation of your successful completion of the DOT return-to-duty requirements (including proof of follow-up tests administered).

Furthermore, all applicants will be asked whether he or she has tested positive, or refused to test, on any pre-employment drug or alcohol test administered by an employer to which the employee applied for, but did not obtain safety-sensitive transportation work covered by DOT agency drug and alcohol testing rules during the past two years (FTA)/ three years (FMCSA).

8.1.4 Pre-employment Breath Alcohol Testing

Although it is not Company policy to test for alcohol on a pre-employment test, some contracts require a breath alcohol test be conducted in addition to the required drug test. Employees working at Company locations servicing those contracts are subject to the requirement and will have to take a pre-employment breath alcohol test. Breath alcohol testing will be in accordance with DOT Part 40 and 655.42.

8.2 Reasonable Suspicion Testing

All safety-sensitive employees shall be subject to reasonable suspicion testing, to include appropriate urine and/or breath alcohol testing when there is reasonable suspicion to believe that a covered employee has used a prohibited drug and/or engaged in alcohol misuse. A reasonable suspicion referral for testing will be made on the basis of specific, contemporaneous, articulable observations concerning the appearance, behavior, speech, or body odors of the covered employee. Reasonable suspicion tests for the presence of alcohol shall be prompted by observations made just prior, during or immediately after the period of the day in which the employee is required to be in compliance with the requirements of Part 655; and those alcohol tests shall only be conducted just before, during, or just after the performance of a safety-sensitive function.

Reasonable suspicion determination will be made by a supervisor, or other Company official who has had the required Reasonable Suspicion training to detect and document the signs and symptoms of probable drug use and alcohol use and who reasonably concludes that an employee may be impaired by a prohibited substance.

Any employee who is required to take a Reasonable Suspicion test will remain off duty until a negative alcohol and drug test is received.

8.3 Post-Accident Testing

For employees subject to the FMCSA regulations:

The surviving driver will be tested when:

- (1) there is fatality; or
- (2) the driver is cited for a moving violation AND either:
 - a) the vehicle is towed from the scene; or
 - b) someone is medically evacuated from the scene.

For employees subject to the FTA regulations:

Fatal Accidents

As soon as practicable following an accident involving the loss of human life, the

Company will conduct drug and alcohol tests on each surviving covered employee operating the public transportation vehicle at the time of the accident. Post-accident drug and alcohol testing of the operator is not required under this section if the covered employee is tested under the fatal accident testing requirements of the Federal Motor Carrier Safety Administration rule 49 CFR 382.303 (a)(1) or (b)(1). The Company shall also test any other covered employee whose performance could have contributed to the accident as determined by investigating staff using the best information available at the time of the decision.

Non-Fatal Injury Accidents

As soon as practicable following an accident not involving the loss of human life in which a public transportation vehicle is involved, the Company will drug and alcohol test each covered employee operating the public transportation vehicle at the time of the accident unless investigating staff determine, using the best information available at the time of the decision, that the covered employee's performance can be completely discounted as a contributing factor to the accident.

The Company shall also test any other covered employee whose performance could have contributed to the accident as determined by investigating staff using the best information available at the time of the decision.

Accident means an occurrence associated with the operation of a vehicle, if as a result: (1) An individual dies; or (2) An individual suffers bodily injury and immediately receives medical treatment away from the scene of the accident; or (3) With respect to an occurrence in which the motor vehicle involved is a bus, electric bus, van, or automobile, one or more vehicles (including non-FTA funded vehicles) incurs disabling damage as the result of the occurrence and such vehicle or vehicles are transported away from the scene by a tow truck or other vehicle; or (4) With respect to an occurrence in which the public transportation vehicle involved is a rail car, trolley car, trolley bus, or vessel, the public transportation vehicle is removed from operation.

(For exact testing criteria, see the Post Accident Testing Procedures Addendum to this policy)

Company Policy: When to conduct a NON-DOT post-accident/incident test

If the accident does not meet the FTA/FMCSA testing criteria, the Company reserves the right to test any safety-sensitive employee after any accident/incident regardless of the severity of the accident/incident. Additionally, the Company will test any other safety-sensitive employee whose performance it determines could have contributed to the accident.

Under these circumstances, it must be explained to the employee that the drug and alcohol tests will be done under Company authority, and should be documented on NON-DOT drug and alcohol chain of custody forms.

Any employee who takes a post-accident test will remain off duty until a negative drug test and alcohol test result is received.

8.4 Random Testing

Employees performing safety-sensitive functions will be subject to unannounced, random drug and alcohol testing in accordance with FTA and FMCSA regulations **and this policy**. The random drug and alcohol testing rates will be, at a minimum, based on the current FTA and FMCSA requirements at all times. Each such employee shall have an equal chance at selection and shall remain in the pool even after being tested. The basis for random selection shall be by a scientifically valid random number generation method initiated by computer. The dates for administering unannounced testing of randomly-selected covered employees shall be spread reasonably throughout the calendar year, month, week, and all hours that safety-sensitive functions are performed. This ensures that employees would have a reasonable expectation that they might be called for a test on any day they are at work. A covered employee shall only be randomly tested for alcohol misuse while the employee is performing safety-sensitive functions; just before the employee is to perform safety-sensitive functions; or just after the employee has ceased performing such functions. A covered employee may be randomly tested for prohibited drug use anytime while on duty. The employee must proceed to the test site immediately after being notified that he or she has been selected for testing.

9.0 Consequences

9.1 Positive Alcohol Test

The FMCSA regulations require that if a safety-sensitive employee's alcohol concentration level is confirmed at 0.02 -0.039, that employee is not permitted to resume safety sensitive functions for 24 hours.

The FTA regulations require that if a safety-sensitive employee's alcohol concentration level is confirmed at 0.02 -0.039, s/he cannot work until the next scheduled duty period, but not less than 8 hours from the time of the test.

If a safety-sensitive employee's alcohol concentration is 0.02 -0.039, s/he is subject to disciplinary action, up to and including termination.

Under both FTA and FMCSA regulations, if a safety-sensitive employee tests at 0.04 or greater, or the employee refuses to test, immediate removal from safety sensitive functions is required. **In this circumstance, under the Company's zero tolerance policy, the employee will be immediately removed from duty and referred to a SAP and terminated from employment.**

9.2 Positive Drug Test

The consequences of a positive drug test or a test refusal are as follows: the employee will immediately be removed from safety-sensitive duties, referred to a SAP **and terminated from employment.**

10.0 MRO Report of a Negative Dilute Specimen

If the MRO informs the Company that a negative drug test was dilute, the employee will be directed to take another test immediately. In some cases the MRO may require the retest to be performed under "Direct Observation." Each employee directed to take another test, will be given the minimum possible advance notice that he or she must go to the collection site to take another test.

For any employee that is directed to take another test, the result of the second test – not

that of the original test – becomes the test of record which the Company will rely on for purposes of this policy. Any employee who is directed to take another test and the employee declines to do so, shall be considered as a refusal to test for purposes of this policy and DOT agency regulations.

Dilute Specimen- A specimen with creatinine and specific gravity values that are lower than expected for human urine.

11.0 Substance Abuse Professional (SAP)

A SAP must meet all of the credential, basic knowledge, qualification training, continuing education, and documentation requirements of 49 CFR Part 40, Subpart O §40.281 (a-e). The SAP will evaluate the employee to determine what assistance the employee needs in resolving problems associated with prohibited substance abuse or alcohol misuse. The SAP will also determine whether or not an employee has successfully completed a program of rehabilitation.

To contact a SAP in your area, please contact:

Substance Abuse and Mental Health Services Administration (SAMHSA)
5600 Fishers Lane, Rockville, MD 20857
1-800-662-4357
<https://www.samhsa.gov/find-treatment>

This agency contains a large network of qualified SAPs throughout the United States. Employees simply visit their website or call the toll-free number and provide their city and zip code and they will be given a list of qualified SAPs closest to their area.

12.0 Training and Education

FTA Regulatory Requirements:

All employees shall participate in a minimum one-hour training session designed to meet FTA requirements by learning about the effects and consequences of drug use on personal health, safety and the work environment. For those supervisors participating in reasonable suspicion determination testing, there will be at least two hours of training to explain the criteria for reasonable cause testing, including at least an hour on the physical, behavioral and performance indicators of probable drug use and another hour on the physical, behavioral, speech and performance indicators of probable alcohol misuse. Initial training sessions will be re-enforced with educational materials and meetings. Further, employees shall be provided with a community hot-line telephone number.

FMCSA Regulatory Requirements:

All persons designated to supervise drivers shall receive at least 60 minutes of training on alcohol misuse and receive at least an additional 60 minutes of training on controlled substances use. The training will be used by the supervisors to determine whether reasonable suspicion exists to require a driver to undergo reasonable suspicion testing. The training shall include the physical, behavioral, speech, and performance indicators of probable alcohol misuse and use of controlled substances.

13.0 Employee Assistance Program and Community Service Hot-Line

The Company's Employee Assistance Program is available to all full-time benefit eligible employees, their spouse, and their children:

Hartford Ability Assist (800) 96-Helps/(800) 964-3577; www.guidanceresources.com

SAMHSA's Center for Substance Abuse Treatment maintains a toll-free referral helpline for locating substance abuse treatment in your area
1-800-662-HELP (4357), 800-487-4889 (TDD), 877-767-8432 (Spanish)

14.0 Records, Confidentiality

A safety-sensitive employee is entitled, upon written request, to review and obtain copies of any records relating to the employee's drug and alcohol testing. The Company will maintain records of its substance abuse program in a secure location with controlled access.

15.0 System Contact

Any questions regarding this policy or any other aspect of the Company's Substance Abuse Management Program should be directed to the office of the following:

Name:	Jason Louis, CDS Vice President of Safety
Address:	COACH USA, Inc. 160 S. Route 17N Paramus, New Jersey 07652
Phone Number:	Cell: 201-248-0131
Email:	Jason.Louis@coachusa.com
eFax:	201-455-6364

16.0 Designated Employer Representative (DER)

The contact information for the Designated Employer Representative (DER), who is authorized to receive test information from the MRO as well as confirmation test results from the qualified B.A.T., is:

Name:	
Address:	
Phone Number:	
Email:	

17.0 Revisions to the Policy and Program

This policy and program are subject to revision in accordance with the DOT

regulations, as amended.

18.0 Zero Tolerance Policy

The Company's "Zero Tolerance" Policy means any positive drug or alcohol test as defined by the DOT, FMCSA and the FTA, or refusal to test, will result in a termination of employment.

EXHIBIT A



DRUG-FREE WORKPLACE POLICY STATEMENT

Coach USA and its subsidiaries are committed to providing safe, reliable and effective service to the public while maintaining a drug-free workplace environment. This statement and its requirements are promulgated in accordance with the Drug-Free Workplace Act of 1988, and apply to all employees, as well as visitors, vendors and contracted employees on Company premises.

- 1) Employees are expected to report for duty sober and free of alcohol and controlled substances.
- 2) The unlawful possession, use, distribution, dispensing, sale or manufacture of controlled substances is prohibited in the workplace. Even in States where recreational and/or medical use of Marijuana is legal: (a) it remains unacceptable for any safety sensitive employee subject to drug testing to use Marijuana; and (b) the possession, use, distribution, dispensing, sale or manufacture of Marijuana is prohibited in the workplace.
- 3) Employees are strongly encouraged to voluntarily seek assistance to overcome drinking and/or chemical dependency problems. Those who come forward voluntarily will not be subject to discipline for seeking assistance with alcohol or drug dependency problems before the occurrence of accidents or a violation of Coach USA, Inc.'s Drug and Alcohol Policy.
- 4) The Employee Assistance Program (EAP) (Hartford Ability Assist: (800) 96-Helps (800) 964-3577), is a free and confidential employee benefit and offers a wide range of support services including referrals to free counseling (up to 5 face to face sessions per year) for full time employees, their spouses and their children who may be experiencing problems with alcohol and drugs.
- 5) Employees are required to notify Corporate Human Resources of any criminal drug statute conviction for a violation occurring in the workplace no later than 5 days after such conviction. The Company must notify any federal contracting agency within 10 days of having received such notice. Any employee who is so convicted will be subject to disciplinary action, up to and including termination.
- 6) Any person who violates this policy: (a) will be subject to disciplinary action, up to and including termination of employment; and (b) will not be permitted on Company premises and/or to conduct business with the Company.

In addition to the Company's EAP, the following organizations provide information concerning the effects of alcohol misuse and drug use, as well as mental health information and referrals, and in some cases, crisis counseling:

SAMHSA's Center for Substance Abuse Treatment:

1-800-662-HELP, 1-800-487-4889 (TDD), 1-877-767-8432 (Spanish)

National Suicide Hotline: 1-800-SUICIDE (784-2433)

National Mental Health Association: 1-800-969-NMHA (6642)

If you would like to obtain a copy of Coach USA, Inc.'s Drug and Alcohol Policy, please contact Jason Louis, Vice President of Safety (201) 248-0131 or your General Manager.

EXHIBIT B



Pursuant to the Federal Department of Transportation regulations, the following are the drugs to be tested for, and the threshold levels of each test which the Company is required to accept. The cutoff concentrations displayed in the following table are for initial and confirmatory drug tests. All cutoff concentrations are expressed in nanograms per milliliter (ng/mL).

Initial test analyte	Initial test cutoff	Confirmatory test analyte	Confirmatory test cutoff concentration
Marijuana metabolites (THCA)	50 ng/mL	THCA	15 ng/mL.
Cocaine metabolite (Benzoylecgonine)	150 ng/mL	Benzoylecgonine	100 ng/mL.
Codeine/ Morphine	2000 ng/mL	Codeine Morphine	2000 ng/mL. 2000 ng/mL.
Hydrocodone/ Hydromorphone	300 ng/mL	Hydrocodone Hydromorphone	100 ng/mL. 100 ng/mL.
Oxycodone/ Oxymorphone	100 ng/mL	Oxycodone Oxymorphone	100 ng/mL. 100 ng/mL.
6-Acetylmorphine	10 ng/mL	6-Acetylmorphine	10 ng/mL.
Phencyclidine	25 ng/mL	Phencyclidine	25 ng/mL.
Amphetamine/ Methamphetamine	500 ng/mL	Amphetamine Methamphetamine	250 ng/mL. 250 ng/mL.
MDMA/MDA	500 ng/mL	MDMA MDA	250 ng/mL. 250 ng/mL.

ALCOHOL

(Includes ethanol, methanol, isopropanol)

Breath Alcohol Concentration

(expressed in terms of grams of alcohol per 210 liters of breath)

Initial Screen

Under 0.02

Confirmatory(given if 0.02 or greater on initial screen)

If there is a confirmed breath alcohol test of between .02% and .039% (inclusive), the employee will be relieved from duty immediately for a minimum of: eight (8) hours under the FTA regulations, and a minimum of 24 hours under the FMCSA regulations, **and the employee will be subject to discipline, up to and including termination.**

If there is a confirmed positive breath alcohol test (.04% or above), the employee will be immediately removed from service, given the name of a SAP, **and will be terminated.**

EXHIBIT C

Drug and Alcohol Clearinghouse

As of January 6, 2020, the company will collect and report information with the DOT Commercial Driver Drug and Alcohol Clearinghouse that includes the following information.

- A verified positive, adulterated, or substituted drug test result;
- An alcohol confirmation test with a concentration of 0.04 or higher;
- A refusal to submit to any required test;
- An employer's report of actual knowledge, as defined at 49 CFR 382.107;
- On duty alcohol use pursuant to 49 CFR 382.205;
- Pre-duty alcohol use pursuant to 49 CFR 382.207;
- Alcohol use following an accident pursuant to 49 CFR 382.209; and
- Controlled substance use pursuant to 49 CFR 382.213;
- A substance abuse professional (SAP as defined in 49 CFR 40.3 of this title) report of the successful completion of the return-to-duty process;
- A negative return-to-duty test; and
- An employer's report of completion of follow-up testing.

Any questions regarding the Drug and Alcohol Clearinghouse should be directed to the company Designated Employer Representative.

Note: Testing and collection procedures will be conducted as set forth by 49 CFR Parts 40 (as amended) & 655 & 382. The information on the following pages is meant for general information only for employees. Any questions regarding reference to the regulations should be directed to the policy section of this handbook. A copy of 49 CFR Part 40 is available for review to each employee upon request to their local manager.

This is a “Zero Tolerance” policy and any reference to return to work after a positive test result does not apply to employees affected by this policy. The DOT/FTA/FMCSA do not mandate that employees be given a “second chance”.

Pre-Employment Testing

1. The FTA and FMCSA regulations require that all applicants for employment in safety-sensitive positions or individuals being transferred to safety-sensitive positions from NON- safety-sensitive positions must be given a pre-employment drug test.
2. Applicants may not be assigned to safety-sensitive functions unless they pass the drug test.
3. Applicants must be informed in writing of the testing requirements prior to conducting the test. **The Company will require applicant to sign a form acknowledging that they know that their urine will be tested for Cocaine, PCP, Amphetamines, Marijuana, and Opioids.**
4. Appropriate personnel at each location will schedule appointments for collection. The employee must be made aware that their placement into a safety sensitive position is contingent upon a negative test result.
5. It is the responsibility of the applicant to report to the collection site at the time and day scheduled.
6. Positive test results must be reviewed by the MRO.
7. Applicants with positive test results are notified by the MRO of the laboratory results and are given an opportunity to discuss the results.
8. Applicants who test positive will not be hired into a safety-sensitive position.
9. An applicant whose pre-employment test results are negative will continue through the safety-sensitive hiring process.
10. Applicants will be asked whether he or she has tested positive, or refused to test on a pre-employment drug or alcohol test while trying to obtain safety-sensitive transportation work from an employer covered by DOT agency during the past two years (FTA)/three years (FMCSA). If applicant admits that he or she had a positive test or a refusal to test, the Company will not allow the applicant to perform safety sensitive duties unless and until applicant provides documents showing the successful completion of the DOT return to duty process and release from a SAP.

Random Testing Procedures

The FTA/FMCSA regulations require random testing for prohibited drugs and alcohol for all safety-sensitive employees. Random testing identifies those who are using drugs or misusing alcohol but are able to use the predictability of other testing methods to escape detection. More importantly, it is widely believed that random testing serves as a strong deterrent against employees beginning or continuing prohibited drug use and misuse of alcohol. The Company

has developed procedures for notification and collection to best implement the requirements of the federal rules.

These procedures answer common questions regarding random testing: Who is tested? Why are only some individuals tested? When and how do the tests occur?

1. Random drug and alcohol testing applies only to safety-sensitive employees.
2. **Any employee with a CDL, who normally doesn't perform safety sensitive functions, but who may perform those functions, will also be included in the random selection pool.**
3. Random drug and alcohol testing is accomplished by a scientifically valid, tamper-proof, computer-generated selection process. A random list for testing will be generated every month.
4. Employees are chosen in an unannounced, unpredictable manner. No employee will be removed from the random pool following the next selection, and every employee will continue to be subject to random selection throughout the year. Every employee in the random pool has an equal chance of being selected every time. Employees are only removed from the random pool when they are in rehabilitation programs, terminated or permanently transferred to a non-safety-sensitive position, or expected to be out for at least 90 days or more.
5. Random testing will be conducted on all shifts, all times of day, and all days of the week throughout the calendar year. No shift is exempt from testing.
6. Random drug testing may be conducted concurrently with random alcohol testing or at any time during an employee's shift. Random alcohol testing will be conducted just before the employee is scheduled to perform a safety-sensitive function, while the employee is performing safety-sensitive functions or just after the employee performs a safety-sensitive function. The employee must proceed to the test site immediately after being notified that he or she has been selected for testing in the allotted time given.
7. For both Maintenance and Operations (Drivers) the designated Manager in each location will be notified which employees have been selected for testing. Once an employee is notified of his/her selection, he/she must report immediately for the test. Failure to report after notification constitutes a refusal to test. (see procedures for random test notification)
8. Employees will be notified where to report for collection, when to stop work and report to the collection site and who will relieve them, if necessary.
9. The employee must submit to a drug and/or alcohol test. Failure to cooperate with the collection procedure in any way constitutes a refusal to test which has the same consequences as a positive test result.
10. The employee is in a paid status throughout the random testing procedure. The time traveling to and from the testing facility and time spent in connection with providing the specimen for testing is considered "On Duty" time for Hours of Service requirements. Employees will be removed from duty if the results of the drug test are positive **and the employee will be terminated.**
11. If both alcohol and drug tests are being given, the breath alcohol test will be performed first. Immediately thereafter, the urine sample will be collected for the drug test.

12. If there is a confirmed breath alcohol test of between .02% and .039% (inclusive), the employee will be relieved from duty immediately for a minimum of: eight (8) hours under the FTA regulations, and a minimum of 24 hours under the FMCSA regulations.
13. If there is a confirmed positive breath alcohol test (.04% or above), the employee will be given the name of a SAP **and terminated**.

Procedures for Random Test Notification

1. A Company representative triggers the selection list of the month's safety-sensitive employees to be scheduled for testing.
2. The Company then schedules the testing. A manager will review work schedules, including planned absences when known, to develop a best available time to perform the tests. The local manager will coordinate the testing schedule with the collector.
3. In developing testing times, the goal will be to minimize the impact in service. Testing will be conducted using the following priority periods:
 - Before work,
 - During split time,
 - After work/shift is completed
 - During work, with standby personnel relief.
4. During work, without relief (if no other time is possible).
5. Notification of Employees- A Company representative will notify each safety-sensitive employee that s/he has been selected for testing. Each employee who is selected is to report to the test site immediately.

The employee cannot "go off sick" or on vacation or leave of absence after notification.
6. Collection site personnel shall report "unreasonable delays" to the DER (Designated Employee Representative) as employees are required to immediately report to the collection site following notification. Failing to report to the collection site within a reasonable allotted time constitutes a refusal to test.
7. The DER shall confirm with the Regional, Divisional, or Operations Manager that the employee was notified.
8. The DER shall notify the proper management official if an employee fails to report for testing after notification.
9. An employee who fails to report for testing shall be removed from duty immediately. If employee is determined to have "refused to test" he/she faces the same consequences as testing "positive" for drugs/alcohol and will be given the name and number of a SAP and **terminated from employment**.

Collection Procedures for All Tests

All collection procedures shall be performed in accordance with 49 CFR Part 40. Upon notification of a test under this policy:

1. The employee must report to the collection site immediately after notification.
2. The employee shall provide photo identification to collection site personnel. Supervisors will verify the identification of employees without photo identification and may photograph the employee if necessary.

3. The employee must comply with all collection procedures.
4. The employee must follow the directions of the collection staff to ensure that an unadulterated urine specimen is collected and/or the breath alcohol test is completed.
5. The employee will be in a private enclosure and unobserved unless a direct observed collection is determined to be needed by the MRO, the local DER, or the collector.
6. The employee must supply at least 45 ml of urine (approx. 1 ½ oz). If the employee gives an inadequate amount of urine or if the employee is unable to give a sufficient urine sample collection site staff shall provide the individual with no more than 40oz of fluid to drink during a period of up to 3 hours. The employee will attempt to provide a complete sample using a fresh container. If the required amount is provided, the collection staff will continue with collection process. If the employee is still unable to provide an adequate specimen within three hours of the first unsuccessful attempt to provide the specimen, the collection staff must discontinue the collection, note the facts on the “remarks” line of the CCF, and immediately notify the DER.

Shy Bladder –

The term “shy bladder” refers to a situation when the employee does not provide a sufficient amount of urine (45 ml) for a DOT required drug test. If an employee tells the collector, upon arrival at the collection site, that he or she cannot provide a specimen, the collector must still begin the collection procedure regardless of the reason given and direct the employee to make the attempt to provide the specimen.

The employee must be monitored during this time. If the employee leaves the collection site or refuses to make the attempt to provide a sufficient urine specimen, this is considered a refusal to submit to a test.

Failure to produce a sample of urine will result in an immediate referral for an evaluation from a licensed physician within 5 days who can determine in his or her reasonable judgment the safety-sensitive employee’s inability to provide an adequate amount of urine. If no medical reason is found substantiating an inadequate sample, the incident will be treated as a “refusal to test” and will carry the same consequences as a positive test result.

1. **It is Company policy that any employee who does not provide a valid specimen during a collection for a test will remain off duty until the employee is cleared from the MRO that the employee had a valid medical reason.**
2. If the employee fails to provide an adequate amount of breath for the breath alcohol test, a second attempt will be made. If the Employee, after multiple attempts, fails to produce a sample, the Breath Alcohol Technician (BAT) shall so note in the “Remarks” section of the breath alcohol testing form and immediately inform the DER. The DER will instruct the employee to obtain, as soon as possible but within 5 days after the attempted provision of breath, an evaluation from a licensed physician who is acceptable to the employer concerning the employee’s medical ability to provide an adequate amount of breath.
3. Whenever there is reason to believe that a particular individual has altered or substituted the urine specimen, a second specimen shall be obtained as soon as possible under direct observation of a same gender observer. Reasons may include; temperature of the specimen out of normal range, bluing agent in the specimen.

Substituted Specimen- A specimen with creatinine and specific gravity values that are so diminished that they are not consistent with human urine.

Adulterated Specimen- A specimen that contains a substance that is not expected to be present in human urine, or contains a substance expected to be present but is at a concentration so high that it is not consistent with human urine.

4. If the breath alcohol screening is 0.02 or greater, the breath alcohol technician will wait at least 15 minutes and a maximum of 30 minutes before administering the confirmation test. Even if more than 30 minutes have passed the BAT will still conduct the confirmation test.
5. To ensure that the test results are attributed to the correct covered employee; both specimen bottles must be sealed and labeled in the presence of the donor. The labels must be printed with the same specimen identification number as the custody control form and are attached to the specimen bottles. The donor initials the labels on the vials verifying that the specimen is his or hers.

Reasonable Suspicion Testing Procedures

1. Supervisors and managers receive training in order to identify behaviors that might be indicators of drug use and/or alcohol misuse. Training includes the procedures for how to deal with employees suspected of drug use and/ or alcohol misuse.
2. If a supervisor observes an appearance, behavior, speech pattern, or body odor of the covered employee that might be indicative of drug use and/or alcohol misuse, he/she directs the employee to stop work and escorts the employee to an area to be questioned and observed in private.
3. The supervisor completes the Reasonable Suspicion Incident Report. The supervisor must ensure that the employee does not continue to operate in a safety-sensitive function after identified for reasonable suspicion testing.
4. If there is a decision to test based on observable symptoms, the employee is ordered to submit to a drug and alcohol test and is escorted to the collection site.
5. The employee is on paid status until the test collection is completed. **Employee will remain off duty until a negative drug and alcohol test is received.** To the greatest extent possible, arrangements shall be made to have him/her transported home and employee should not be allowed to leave on his/her own recognizance.
6. If there is a confirmed breath alcohol test of between .02% and .039% (inclusive), the employee will be relieved from safety-sensitive duty immediately for a minimum of eight (8) hours under the FTA regulations, and a minimum of 24 hours under the FMCSA regulations. **Additionally, the employee will be subject to discipline, up to and including termination.**
7. If there is a confirmed positive breath alcohol test (.04% or greater) and/or confirmed positive drug test, or refusal to test, the employee shall be provided the name and number of a SAP and the employee **will be terminated.**
8. If the employee's drug test is confirmed negative by the MRO and/or the BAT test is below 0.02 the employee will be allowed to return to work **and will be paid for any time missed.**

Post-Accident Testing Procedures

FMCSA

For employees subject to the FMCSA regulations:

The surviving driver will be tested when:

- (1) there is fatality; or
- (2) the driver is cited for a moving violation AND either:
 - a) the vehicle is towed from the scene; or
 - b) someone is medically evacuated from the scene.

Post-accident alcohol tests required by the FMCSA must be administered within two hours following the accident. If not, the Company must prepare and maintain on file a record stating the reasons the test was not promptly administered. If a post-accident alcohol test required by the FMCSA is not administered within eight hours following the accident, the Company will cease attempts to administer the alcohol test and must prepare and maintain the same record. Records will be provided to the FMCSA upon request.

Post-accident controlled substance tests required by the FMCSA must be administered within 32 hours following the accident. If not, the Company will cease attempts to administer that test, and prepare and maintain on file a record stating the reasons the test was not promptly administered. Records will be provided to the FMCSA upon request.

Any driver subject to FMCSA post-accident testing shall remain readily available for such testing or may be deemed by the Company to have refused to submit to testing. The FMCSA regulations do not require the delay of necessary medical attention for injured people following an accident, and do not prohibit a driver from leaving the scene of an accident for the period necessary to obtain assistance in responding to the accident, or to obtain necessary emergency medical care.

The Company will provide drivers with necessary post-accident information, procedures and instructions, prior to the driver operating a commercial motor vehicle, so that drivers will be able to comply with the FMCSA's post-accident testing requirements.

The results of a breath or blood test for the use of alcohol, conducted by Federal, State, or local officials having independent authority for the test meet FMCSA post-accident requirements provided such tests conform to the applicable Federal, State or local alcohol testing requirements, and that the results of the tests are obtained by the Company.

The results of a urine test for the use of controlled substances, conducted by Federal, State, or local officials having independent authority for the test meet FMCSA post-accident requirements provided such tests conform to the applicable Federal, State or local controlled substances testing requirements, and that the results of the tests are obtained by the Company.

If the driver refuses to be tested, or the breath alcohol test is .04 or greater, or if the drug test is confirmed positive, the driver will be immediately removed from duty and will be referred to a qualified SAPs, **and the driver will be terminated.**

FMCSA post-accident testing is not required and does not apply to:

- (1) An occurrence involving only boarding or alighting from a stationary motor vehicle;
or
- (2) An occurrence involving only the loading or unloading of cargo; or

(3) An occurrence in the course of the operation of a passenger car or a multipurpose passenger vehicle by an employer unless the motor vehicle is transporting passengers for hire or hazardous materials of a type and quantity that require the motor vehicle to be marked or placarded.

FTA

The FTA regulations require testing for prohibited drugs and alcohol in the case of certain public transportation accidents. Post-accident testing is mandatory for accidents where there is a loss of life and for other non-fatal accidents.

1. The supervisor ensures that all injured people receive proper medical care. Nothing in this section shall be construed to require the delay of necessary medical attention for the injured following an accident or to prohibit a covered employee from leaving the scene of an accident for the period necessary to obtain assistance in responding to the accident or to obtain necessary emergency medical care.
2. The supervisor determines whether the accident meets FTA criteria using the Company's "Post Accident Decision Checklist Form".
3. If the accident meets the FTA/DOT criteria a DOT post-accident drug and alcohol test will be conducted immediately. The employee will be taken to the collection site and tested as soon as practicable following the accident. The employee should remain readily available for alcohol testing up to 8 hours and for drug testing up to 32 hours after the accident, including notifying his/her supervisor of his/her location or he/she may be deemed to have refused to submit to testing if he/she does not make him/herself readily available for testing.
4. Once the tests have been completed the employee will remain off duty until a negative drug and alcohol test is received.
5. If the employee is not tested within two hours for alcohol, the supervisor must document the reason for the delay, and if test is not conducted in 8 hours, the DER shall cease all further attempts and update the records as to the reason(s) why the test was not completed. If 32 hours have passed, the DER shall cease all further attempts to complete the drug test.
6. If the employee refuses to be tested, or the breath alcohol test is .04 or greater, or if the drug test is confirmed positive, the employee is immediately removed from duty, the SAP will find them the qualified SAPs closest to their area, and **will be terminated.**

FTA Post -Accident Testing Criteria

It should be noted that a post-accident test is given because the incident meets the criteria listed below. It is NOT a probable cause or reasonable suspicion test. An accident (§ 655.4) is defined as an occurrence associated with the operation of a vehicle in which:

1. An individual dies.
2. An individual suffers a bodily injury and immediately receives medical treatment away from the scene of the accident.
3. With respect to an occurrence in which the public transportation vehicle involved is a bus, van or automobile, one or more vehicles incurs disabling damage as the result of the occurrence and is transported away from the scene by a tow truck or other vehicle. For purposes of this definition, “disabling damage” means damage which precludes departure of any vehicle from the scene of the occurrence in its usual manner in daylight after simple repairs.

(Inclusions) Disabling damage includes damage to vehicles that could have been operated, but would have been further damaged if so operated.

(Exclusions) damage which can be remedied temporarily at the scene of the occurrence without special tools or parts, tire disablement without other damage even if no spare tire is available, or damage to headlights, tail-lights, turn signals, horn, or windshield wipers that makes them inoperative.

4. With respect to an occurrence in which the public transportation vehicle involved is a rail car, trolley car, trolley bus, or vessel, the public transportation vehicle is removed from operation.
5. The FTA has determined that “**LIFTS**” constitute equipment used in revenue service and their operation is essential to the operation of the vehicle and protection of public safety, their operation shall now be included in the accident definition.

To determine if a test should be administered under this section, always use the Company’s “Post Accident Decision Checklist”. This form should be used for all accidents in determining whether a test will be done under DOT authority.

PROHIBITED DRUGS AND ALCOHOL MISUSE

A study conducted showed 75 percent of illicit drug users 18 and older are employed, which amounts to about 10 million U.S. workers. On a daily basis, based on 250 work days in a year, at least 42,000 Americans are coming to work stoned or are getting “high” while on the job.

Studies and statistics show that:

1. Every 23 minutes a death occurs as a result of a drug or alcohol related accident.
2. A typical abuser is:
 - a. Late to work 3 times more often
 - b. Requests twice as much time off
 - c. Is absent 2 1/2 times more than average
 - d. Uses 3 times as many sick benefits
 - e. Collects 5 times as much worker’s comp
 - f. Has 300% higher medical costs/benefits

If these statistics haven’t convinced you that the problem is serious, let’s look at a few more.

A national survey once reported that:

1. 19% of all children over the age of 12 had used some type of illegal drug
2. 65% of 18 to 25 year olds had used some type of illegal drug
3. 30 to 40 million Americans stated they had used cocaine
4. By age 17, 70% of American teenagers had tried alcohol

As you can see, drug and alcohol abuse is a serious problem, having a major effect on all our lives. Even though you may not be abusing drugs or alcohol, you are affected by the results of drug and alcohol abuse in our society. You pay higher medical costs to help cover the costs for abusers who cannot afford the cost of treatment. You pay higher insurance costs to help fund the drug and alcohol abuse programs paid for by insurance companies. The material and services you buy cost more because of decreased worker productivity, as well as increased cost to employers.

This section is designed to provide you with a brief overview of the seriousness of using controlled substances and alcohol. It also provides education on the signs, symptoms and effects of the illicit drugs that you will be tested for. Your employer has taken great measures to assure you of a safe working environment. Please review this booklet in its entirety to educate yourself on drug and alcohol in the workplace. When you have completed reading this material, you will better understand the need for a drug-free workplace.

The drugs for which you will be subject to testing include:

- Amphetamine
- Cocaine
- Marijuana
- Opioids
- Phencyclidine (PCP)
- Alcohol (by evidential breath testing device only)

Facts about Amphetamines

Amphetamines (methamphetamine, MDMA-ecstasy) are central nervous system stimulants. They tend to make people “hyper” and “jumpy”. They can be taken either orally or injected. They are often used by people to stay awake and to counteract the effects of drowsiness. They are especially dangerous to take while performing safety-sensitive tasks or driving.

Ecstasy, MDMA (3,4 methylenedioxymethamphetamine), is a synthetic, psychoactive drug that is chemically similar to the stimulant methamphetamine and the hallucinogen mescaline. MDMA causes an increase in serotonin which plays an important role in the regulation of mood, sleep, pain, appetite, and other behaviors.

Some heavy MDMA users experience long lasting confusion, depression, and selective impairment of working memory and attention processes. Ecstasy users make extremely dangerous drivers. They can exhibit the same impairments as amphetamine, heroin, cocaine, and hallucinogen users.

Signs and Symptoms of Amphetamine Use

- ◆ Hypersensitivity
- ◆ Exhaustion
- ◆ Dilated Pupils
- ◆ Grinding teeth
- ◆ Loss of appetite and immediate weight loss
- ◆ Dry mouth
- ◆ Excessive talking

Effects on Person

- ◆ More likely to take risks
- ◆ Impaired judgement

Facts about Cocaine

Cocaine also stimulates the central nervous system. It gives the user an intense feeling of well-being, or euphoria, known as a “high”. The “high” will last for 10 to 60 minutes. A more potent form of the drug called “crack” cocaine is especially addicting and dangerous. Although it’s “high” lasts only about 5 to 8 minutes, “crack” cocaine can be addicting after only one use, and cause death the first time it is used. Cocaine can be injected, snorted, or free-based. Snorting is sniffing the drug up the nose, and free-basing is done by heating the drug and inhaling the vapors.

Signs and Symptoms of Cocaine Use

- ◆ Mood swings
- ◆ Weight Loss
- ◆ Restlessness: Difficulty sitting or standing in one place
- ◆ Depression
- ◆ Nose bleeds
- ◆ Irritable, angry, nervous, angers easily
- ◆ Bad breath
- ◆ Euphoric feeling
- ◆ Running nose, uncontrollable sniffing

Effects on Person

- ◆ Slowed reaction time
- ◆ Distorted vision and depth perception
- ◆ Slow to make decisions
- ◆ Unable to correctly measure time and distance

Facts about Marijuana

Marijuana is a depressant and mind altering drug. Marijuana does not depress the central nervous system's reaction, it works on the brain. Mind altering means it causes hallucinations. It can be eaten or smoked. Street names for marijuana are "dope", "grass", "joint", "hash", or "hooch".

Tests have shown that people's reflexes and thought processes are slower under the influence of marijuana. The effects of this drug are longer lasting than first thought. In fact, impairment can last more than 24 hours after using marijuana. The body actually stores the drug for days, weeks, and in some cases, months, depending on the frequency of use.

Signs and Symptoms of Marijuana Use

- ◆ Dilated pupils
- ◆ Slowed reflexes
- ◆ Giddiness
- ◆ Slowed thinking
- ◆ Moodiness
- ◆ Trance-like state
- ◆ Impaired vision
- ◆ Reduced feeling of pain
- ◆ Odor of burning

- ◆ Short-term memory loss
- ◆ Loss of concentration
- ◆ Unable to sleep after prolonged use

Signs to look for

- ◆ Cigarette rolling paper
- ◆ Dried plant material, either crumbled or pressed
- ◆ Roach clip (device to hold joint)
- ◆ Hash pipe (very small pipe)

Facts about Opioids

Opioids are classified as a narcotic analgesic. They tend to have a sedating, calming effect, and act as a depressant to the central nervous system. Opioids are more commonly known as morphine, codeine, heroin, oxycodone, oxymorphone, hydrocodone and hydromorphone. Street names for opioids are “junk”, “smack”, “horse”, and “brown sugar”. Opioids are prescribed by doctors to relieve pain, but they are used by the abuser to relax or “escape the real world”. They can either be taken orally, injected or smoked.

When the drug is injected, the user feels an immediate “rush”, usually followed by a very relaxed and soothing feeling. However, some opiates can cause very unpleasant side effects such as nervousness, nausea, and restlessness, and if taken in excess, may cause coma or death.

Signs and Symptoms of Opioid Use

- ◆ Mental confusion
- ◆ Slurred speech
- ◆ Unsteadiness
- ◆ Hostility
- ◆ Memory loss
- ◆ Drowsiness
- ◆ Excess talking
- ◆ Euphoria
- ◆ Depression
- ◆ Short attention span
- ◆ Cold, moist or bluish skin
- ◆ Reduced feeling of pain

Effects on Person

- ◆ Lack of concentration – Day dreaming
- ◆ Distorted sense of time and distance
- ◆ Distorted vision

Facts about Phencyclidine (PCP)

Phencyclidine, commonly called “Angel Dust”, is known as a dissociative anesthetic. Users of PCP may experience hallucinations and signs of intoxication. They may not be able to focus their attention or will experience confusion and lack of coordination.

Although PCP has immediate short term effects, it is also known for its long term effect of causing psychotic behavior often associated with violent acts. Other street names for PCP include “hog”, and “crystal”. PCP may be smoked, snorted or injected.

Signs and Symptoms of PCP Use

- ◆ Delusions
- ◆ Confusion
- ◆ Panic
- ◆ Increased blood pressure
- ◆ Anxiety
- ◆ Flashbacks

Effects on Person

- ◆ More likely to take risks
- ◆ Impaired coordination
- ◆ Aggressive actions

Facts about Alcohol

Alcohol is a socially acceptable drug that has been consumed throughout the world for centuries. It is considered a recreational beverage when consumed in moderation for enjoyment and relaxation during social gatherings. However, when consumed primarily for its physical and mood-altering effects, it is a substance of abuse. As a depressant, it slows down physical responses and progressively impairs mental functions.

Signs and Symptoms of Use

- ◆ Dulled mental processes
- ◆ Lack of coordination
- ◆ Odor of alcohol on breath
- ◆ Possible constricted pupils
- ◆ Sleepy or stuporous condition
- ◆ Slowed reaction rate
- ◆ Slurred speech

(Note: Except for the odor, these are general signs and symptoms of any depressant substance.)

Health Effects

The chronic consumption of alcohol (average of three servings per day of beer [12oz], whiskey [1oz], or wine [6oz glass] over time may result in the following health hazards:

- ◆ Decreased sexual functioning
- ◆ Dependency (up to 10% of all people who drink alcohol become physically and/or mentally dependent on alcohol and can be termed “alcoholic”)
- ◆ Fatal liver diseases
- ◆ Increased cancers of the mouth, tongue, pharynx, esophagus, rectum, breast, and malignant melanoma.
- ◆ Kidney disease
- ◆ Pancreatitis
- ◆ Spontaneous abortion and neonatal mortality
- ◆ Ulcers
- ◆ Birth defects (up to 54% of all birth defects are alcohol related).

Workplace Issues

- ◆ It takes one hour for the average person (150 pounds) to process one serving of an alcoholic beverage from the body.
- ◆ Impairment in coordination and judgment can be objectively measured with as little as two drinks in the body.
- ◆ A person who is legally intoxicated is 6 times more likely to have an accident than a sober person.



**ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING
OF COACH USA, INC.'s DRUG AND ALCOHOL POLICY**

I, _____, the undersigned, hereby
Print Full Name

acknowledge that I have received a copy of Coach USA, Inc.'s Drug and Alcohol Policy mandated by the U.S. Department of Transportation, Federal Transit Administration, and the Federal Motor Carrier Safety Administration. I understand this policy is required by 49 CFR Parts 40, 382, and 655. Any provisions contained herein which are not required by 49 CFR Parts 40, 382, and 655, that have been imposed solely on the authority of the Company are designated as such in the policy document.

I further understand that receipt of this policy constitutes a legal notification of the contents, and that it is my responsibility to become familiar with and adhere to all provisions contained therein. I will seek and get clarification for any compliance with all provisions contained in the policy. I also understand that compliance with all provisions contained in the policy is a condition of employment.

I further understand that the information contained in the approved policy dated June 2018 is subject to change, and that any such changes, or addendum, shall be disseminated in a manner consistent with the provision of 49 CFR Part 655 and 49 CFR Part 382.

I further acknowledge that I have been advised of the consequences for employees who violate the testing requirements and information concerning the effects and alcohol misuse and controlled substance abuse on health, work and personal life.

Signature of Employee

Date

Print Name

ATTACHMENT 6

MAINTENANCE CHECKLIST - PM A

Motorcoaches/OTR7500

This inspection complies with FMCSR 396.17
(Federal Annual Inspection and Appendix G)



PMI RECORD SHEET *Prepare separate report for each vehicle inspected*

	Date
	Vehicle No.
	Vehicle Mileage
Inspector Name (please print)	Inspector's Signature
Repair Order No.	PMI Level A

PMI RECORDING SYMBOLOGY: D=Defect Found N=Not Applicable √=OK

AREA 100 (IN-CAB INSPECTION)		
SEQ	ITEM DESCRIPTION	
10	Check DOT book/registration/insurance/IFTA/accident kit	
20	Check and address DVIR book for unattended defects	
30	Test and record foot brake and park brake stopping distance	
40	Check dash lights/warning lights/gauges	
50	Test horns-foot/wheel	
60	Check windshield wiper/washer operation and fluid level	
70	Inspect mirrors for proper operation	
80	Check sun visor	
90	Check steering wheel freeplay and tilt/telescopic function	
100	Test low air buzzer and light and park brake activation	
110	Check for air leaks-static	
120	Check for air leaks-applied	
130	Check all interior lights	
140	Inspect all passenger seats and seat belts-repair if needed	
150	Inspect hand rails and stanchions	
160	Inspect passenger barriers and modesty panels	
170	Check first aid kit	
180	Inspect fire extinguisher-certified/sealed/mounted	
190	Test emergency windows/exit labels (CFR-49 396.3(A)(2))	
200	Test emergency escape hatches	
210	Check all ADA decals and signage for condition	
220	Inspect ADA restraint devices for correct number and operation	
230	Clean sliding track of debris with compressed air	

AREA 200 (CAB AND BODY INSPECTION)		
240	Inspect windshields and side glass	
250	Inspect windshield wiper blades	
260	Test back up lights and alarm	
270	Check fuel cap and DEF cap for leaks	
280	Inspect safety triangles-3 required	
290	Check battery hold down clamps	
300	Check wheel hub oil levels in tag/front axle if applicable	

**BRAKE PERFORMANCE TEST
RECORD DISTANCE**

FOOT (PANIC) _____

PARKING BRAKE _____

Brake Requirements:
Panic Stop 24 Feet (Max)
Parking Brake 80 Feet (Max)

DESCRIBE IN DETAIL:

RECORD ALL PHYSICAL DAMAGE

FRONT

REAR

ROOF

OTHER

LEFT SIDE

RIGHT SIDE

VEHICLE PROHIBITED FROM SERVICE UNTIL OOS DEFECTS REPAIRED	YES	NO	PM WO #	Date
				Bus
			PM FOLLOW UP WO#	Miles

PM DEFECTS

List defects and if repaired describe repair.
 Person making repair must place initials in the corresponding box.

		Repaired on PM WO or on PM Follow-up WO	Create Service Request in FA	Listed defect does not need repair
1				
R				
2				
R				
3				
R				
4				
R				
5				
R				
6				
R				
7				
R				
8				
R				
9				
R				
10				
R				
11				
R				
12				
R				
13				
R				
14				
R				

FA ___ FILE ___ FIRESTONE/BRIDGESTONE ___ MICHELIN ___ (OFFICE USE ONLY)

STEEL WHEELS ___ **BUS TIRE INVENTORY**

BUS #: _____ DATE: _____
 LIFETIME MILEAGE _____ HUB MILEAGE _____

ALUMINUM WHEELS _____
 B=BRIDGESTONE F=FIRESSTONE
 M=MICHELIN
 ANY OTHER TYPE TIRE MARK AS NEEDED

B
A
C
K

L/T	CS	L.O.D.	CS	CS	L/F	F R O N T
				SPARE = Y N		
		L.I.D.	CS	SPARE	ON WHEEL= Y N	
		R.I.D.	CS	CS	STEEL= Y N	
				ALUMINUM= Y N		
R/T	CS	R.O.D.	CS	CS	R/F	

*****NOTE IF SPARE TIRE WAS INSTALLED AT TIME OF THIS INVENTORY

Y	N
---	---

Bus # : _____ Date : _____ Mileage: _____

WHEEL TORQUES (ALL WHEELS MUST BE TORQUED ON EVERY PM)

	FRONT AXLE	
	LEFT	RIGHT
INITIAL/SIGN		
ANY MOVEMENT? (YES OR NO)		

DRIVE AXLE	
LEFT	RIGHT

TAG AXLE	
LEFT	RIGHT

Bus:

PASSENGER BUS
PREVENTIVE MAINTENANCE REPORT
(MD TR **ss**23-301--23-305; COMAR 11.22: FMCSR **s396.17**)

Owners Name: _____ Address: 7479 New Ridge Road
Telephone: (410) 647-2321 _____ Hanover, Md 21076
Make: _____ Model: _____ Year: _____
Company Name: Dillons Bus Service Tag Number: _____
Manufacture's Vehicle ID Number: _____
Title Number: _____

COMAR 11.22.03	Components	Passed	Failed	Date Repaired*
2	Alignment			
3	Suspension			
4	Steering			
5	Brake System - Hydraulic/Vacuum			
6	Brake System -Air			
7	Tires			
8	Wheels, Rims, Lock Rings< Studs, and Nuts			
9	Accelerator Pedal and Air Throttle			
10	Fuel Storage and Delivery System			
11	Exhaust System			
12	Universal Joints and C-Clamps			
13	Vehicle Frame, Body, and Sheet Metal			
14	Lighting			
15	Electrical System			
16	Emergency Equipment			
17	Seats and Seat Belts			
18	Sun Visor			
19	Mirrors			
20	Glazing			
21	Windshield Wipers and Washers			
22	Defroster			
23	Auto Trans Gear Selector/Neutral Safety Switch			
24	Speedometer and Odometer			
25	Brake and Clutch Pedal			
26	Horn			

Inspected: (a) Date: _____ (b) Vehicle Mileage _____
Inspected By (Print): _____ Repaired By (Print) _____
Certified By (Print): _____ (Signature): _____
(Owner or authorized representative)

*Provide description of repairs and parts used on reverse side of this form.

MAINTENANCE CHECKLIST - PM B
Motorcoaches/OTR7500

This inspection complies with FMCSR 396.17
(Federal Annual Inspection and Appendix G)

Coach USA

PMI RECORD SHEET *Prepare separate report for each vehicle inspected*

	Date
	Vehicle No.
	Vehicle Mileage
Inspector Name (please print)	Inspector's Signature
Repair Order No.	PMI Level B

PMI RECORDING SYMBOLOGY: D=Defect Found N=Not Applicable √=OK

AREA 100 (IN-CAB INSPECTION)	
SEQ	ITEM DESCRIPTION
10	Check DOT book/registration/insurance/IFTA/accident kit
20	Check and address DVIR book for unattended defects
30	Test and record foot brake and park brake stopping distance
40	Check dash lights/warning lights/gauges
50	Test horns-foot/wheel
60	Check defroster operation
70	Check windshield wiper/washer operation and fluid level
80	Inspect mirrors for proper operation
90	Check sun visor
100	Cycle kneeling system-test alarms/interlocks
110	Check tilt/telescopic wheel for operation
120	Check steering wheel for freeplay
130	Test low air buzzer and light t and park brake activation
140	Check for air leaks-static
150	Check for air leaks-applied
160	Check air governor setting _____ psi
170	Check passenger doors
180	Check all interior lights
190	Check all passenger seats and seat belts-repair if needed
200	Inspect hand rails and stanchions
210	Inspect passenger barriers and modesty panels
220	Inspect restroom light and fan if applicable
230	Clean restroom exhaust fan screen
240	Check first aid kit
250	Inspect fire extinguisher-certified/sealed/mounted
260	Test emergency windows/exit labels (CFR-49 396.3(A)(2))
270	Test emergency escape hatches
280	Check all ADA decals and signage for condition
290	Inspect ADA restraint devices-correct number/operation
300	Clean sliding seat track of debris with compressed air

BRAKE PERFORMANCE TEST RECORD DISTANCE	
FOOT (PANIC)	_____
PARKING BRAKE	_____

Brake Requirements:
Panic Stop 24 Feet (Max)
Parking Brake 80 Feet (Max)

DESCRIBE IN DETAIL:

RECORD ALL PHYSICAL DAMAGE

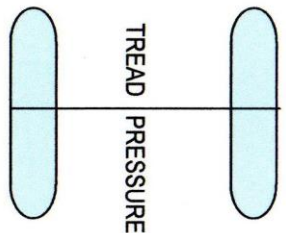
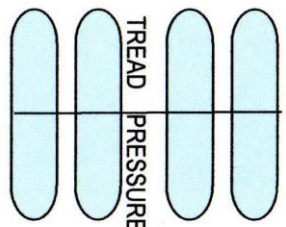
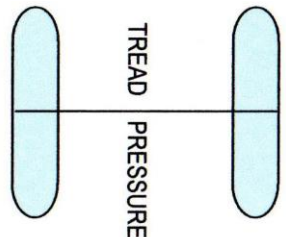
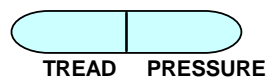
FRONT
 REAR
 ROOF

RIGHT SIDE
 LEFT SIDE
 OTHER

AREA 200 (CAB AND BODY INSPECTION)	
310	Inspect windshields
320	Inspect windshield wiper blades
330	Inspect side glass
340	Check route/destination signs
350	Check all exterior lights and reflectors
360	Test back up lights/alarm

PMI RECORDING SYMBOLOGY: D=Defect Found N=Not Applicable √=OK

AREA 200 (CAB AND BODY INSPECTION)	
SEQ	ITEM DESCRIPTION
370	Inspect fuel tank and mounting
380	Check fuel cap/DEF cap for leaks
390	Inspect safety triangles-3 required
400	Check battery hold down clamps
410	Inspect battery connections
420	Check battery water
430	Check wheel hub oil levels in tag/front axle-if applicable
AREA 300 (TIRES AND WHEELS)	
440	Inspect wheels for cracks,damage or broken welds
450	Record tread depths and check for unusual tire wear
460	Record tire pressure-adjust to spec
470	Inspect smart tire sensors and operation
480	Inspect lug nuts and studs-torque lug nuts to spec
490	Check spare tire-tread depth and pressure
500	Inspect/lubricate front bumper
510	Inspect/lubricate all passenger/baggage doors and locks
AREA 400 (ENGINE AND ELECTRICAL)	
520	Verify fire suppression extinguisher gauge is in green arc
530	Remove belts and check pulley bearings-noise or movement
540	Inspect all belts and hoses-cracks/tension
550	Check fan clutch operation and fan blade
560	Check fan shroud
570	Check fan drive gear box for leaks and oil level
580	Inspect and lube fan drive U joints (E and J Models)
590	Inspect for exhaust leaks
600	Check for exhaust system blankets-if applicable
610	Inspect air charge cooler-leaks/cracks/bad hoses/clamps
620	Check wiring harnesses for chafing and securement
630	Check for oil leaks
640	Check fuel lines-leaks or cracks
650	Check coolant transfer-if applicable
660	Check motor mounts
670	Check that blow off caps are in place
680	Check power steering for leaks
690	Check air compressor mounting



RECORD TREAD DEPTH AND TIRE PRESSURE

LOAD TEST BATTERIES AIND RECORD READINGS

1	2	3	4
---	---	---	---

VEHICLE PROHIBITED FROM SERVICE UNTIL OOS DEFECTS REPAIRED	YES	NO	PM WO #	Date
				Bus
			PM FOLLOW UP WO#	Miles

PM DEFECTS

List defects and if repaired describe repair.
Person making repair must place initials in the corresponding box.

Repaired on PM WO or on PM Follow-up WO	Create Service Request in FA	Listed defect does not need repair
---	---------------------------------------	---

1			
R			
2			
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5			
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11			
R			
12			
R			
13			
R			
14			
R			

FA ___ FILE ___ FIRESTONE/BRIDGESTONE ___ MICHELIN ___ (OFFICE USE ONLY)

STEEL WHEELS ___ **BUS TIRE INVENTORY**

BUS #: _____ DATE: _____
 LIFETIME MILEAGE _____ HUB MILEAGE _____

ALUMINUM WHEELS _____
 B=BRIDGESTONE F=FIRESSTONE
 M=MICHELIN
 ANY OTHER TYPE TIRE MARK AS NEEDED

B
A
C
K

L/T	CS	L.O.D.	CS	CS	L/F	F R O N T
				SPARE = Y N		
		L.I.D.	CS	SPARE	ON WHEEL= Y N	
		R.I.D.	CS	CS	STEEL= Y N	
				ALUMINUM= Y N		
R/T	CS	R.O.D.	CS	CS	R/F	

*****NOTE IF SPARE TIRE WAS INSTALLED AT TIME OF THIS INVENTORY

Y	N
---	---

Bus # : _____ Date : _____ Mileage: _____

WHEEL TORQUES (ALL WHEELS MUST BE TORQUED ON EVERY PM)

	FRONT AXLE	
	LEFT	RIGHT
INITIAL/SIGN		
ANY MOVEMENT? (YES OR NO)		

DRIVE AXLE	
LEFT	RIGHT

TAG AXLE	
LEFT	RIGHT

**MAINTENANCE CHECKLIST - PM D-
Motorcoaches/OTR7500**

This inspection complies with FMCSR 396.17
(Federal Annual Inspection and Appendix G)



PMI RECORD SHEET *Prepare separate report for each vehicle inspected*

	Date
	Vehicle No.
	Vehicle Mileage
Inspector Name (please print)	Inspector's Signature
Repair Order No.	PMI Level D

PMI RECORDING SYMBOLOGY: D=Defect Found N=Not Applicable √=OK

AREA 100 (IN-CAB INSPECTION)	
SEQ	ITEM DESCRIPTION
10	Check DOT book/registration/insurance/IFTA/accident kit
20	Check and address DVIR book for unattended defects
30	Test and record foot brake and park brake stopping distance
40	Check dash lights/warning lights/gauges
50	Test horns-foot/wheel
60	Check defroster operation
70	Check windshield wiper/washer operation and fluid level
80	Inspect mirrors for proper operation
90	Check sun visor
100	Cycle kneeling system-test alarms/interlocks
110	Verify that fire suppression system ok lamp is illuminated
120	Check tilt/telescopic wheel for operation
130	Check steering wheel for freeplay
140	Test low air buzzer and light and park brake activation
150	Check for air leaks-static
160	Check for air leaks-applied
170	Check air governor setting _____ psi
180	Inspect throttle and brake pedals for wear and play and lubricate
190	Check clutch actuator throw _____ mm
200	Check passenger doors
210	Check all interior lights
220	Check all passenger seats and seat belts-repair if needed
230	Check step and floor covering
240	Inspect hand rails and stanchions
250	Inspect passenger barriers and modesty panels
260	Inspect overhead racks-mounts/doors
270	Inspect window blinds
280	Inspect restroom light and fan if applicable
290	Clean restroom exhaust fan screen
300	Check first aid kit
310	Inspect fire extinguisher-certified/sealed/mounted
320	Test emergency windows/exit labels (CFR-49 396.3(A)(2))
330	Check all 110 volt outlets for power-if applicable
340	Test emergency escape hatches
350	Check all ADA decals and signage for condition
360	Inspect ADA restraint devices-correct number/operation
370	Clean sliding seat track of debris with compressed air
AREA 200 (CAB AND BODY INSPECTION)	
380	Inspect windshields
390	Inspect windshield wiper blades
400	Inspect side glass
410	Check route/destination signs
420	Check all exterior lights and reflectors
430	Test back up lights/alarm
440	Check exterior signage/DOT# and ICC#/regulatory stickers

**BRAKE PERFORMANCE TEST
RECORD DISTANCE**

FOOT (PANIC) _____

PARKING BRAKE _____

Brake Requirements:
Panic Stop 24 Feet (Max)
Parking Brake 80 Feet (Max)

RECORD ALL PHYSICAL DAMAGE

DESCRIBE IN DETAIL:

FRONT

REAR

ROOF

RIGHT SIDE

LEFT SIDE

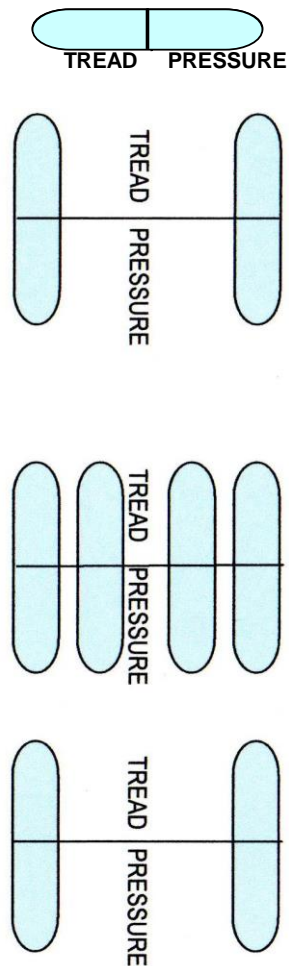
OTHER

PMI RECORDING SYMBOLOGY: D=Defect Found N=Not Applicable √=OK

AREA 200 (CAB AND BODY INSPECTION)	
SEQ	ITEM DESCRIPTION
450	Check mud flaps
460	Inspect fuel tank and mounting
470	Check fuel cap/DEF cap for leaks
480	Inspect safety triangles-3 required
490	Check battery hold down clamps
500	Inspect battery connections
510	Check battery water
520	Check wheel hub oil levels in tag/front axle-if applicable

AREA 300 (TIRES AND WHEELS)	
530	Inspect wheels for cracks,damage or broken welds
540	Record tread depths and check for unusual tire wear
550	Record tire pressure-adjust to spec
560	Inspect smart tire sensors and operation
570	Inspect lug nuts and studs-torque lug nuts to spec
580	Check spare tire-tread depth and pressure
590	Inspect/lubricate front bumper
600	Inspect/lubricate all passenger/baggage doors and locks

AREA 400 (ENGINE AND ELECTRICAL)	
610	Verify fire suppression extinguisher gauge is in green arc
620	Remove belts and check pulley bearings-noise or movement
630	Inspect all belts and hoses-cracks/tension
640	Check fan clutch operation and fan blade
650	Check fan shroud
660	Inspect and lube fan drive U joints (E and J Models)
670	Inspect for exhaust leaks
680	Check for exhaust system blankets-if applicable
690	Inspect air charge cooler-leaks/cracks/bad hoses/clamps
700	Check wiring harnesses for chafing and securement
710	Check for oil leaks
720	Check fuel lines-leaks or cracks
730	Check coolant transfer pump-if applicable
740	Check motor mounts
750	Check that blow off caps are in place
760	Check power steering for leaks
770	Check air compressor mounting

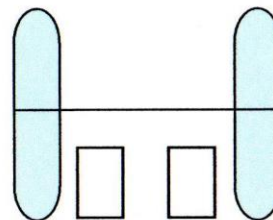
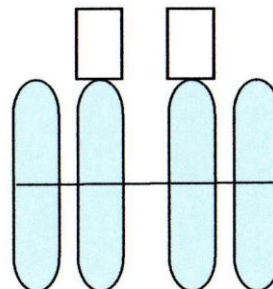
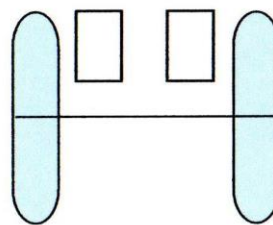


LOAD TEST BATTERIES AIND RECORD READINGS

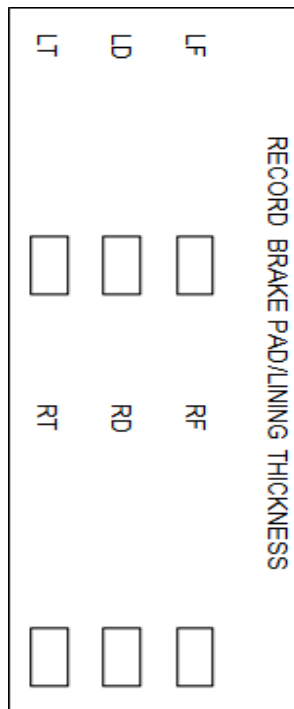
1	2	3	4
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PMI RECORDING SYMBOLOGY: D=Defect Found N=Not Applicable √=OK

AREA 500 (CHASIS AND UNDERCARRIAGE)		
SEQ	ITEM DESCRIPTION	
780	Inspect steering gearbox mounting and hoses for leaks.	
790	Check steering linkage-draglink/pitman arm/rod ends	
800	Inspect bushings-suspension and shocks	
810	Inspect air bellows-cracks and leaks	
820	Inspect sway bar-bushings/clamps/links	
830	Check leaf springs-u bolts/center bolts/shackles-if applicable	
840	Inspect radius rod bushings-wear and movement	
850	Inspect radius rod studs and/or mounting bolts	
860	Inspect frame and front axle for damage/cracks/corrosion	
870	Check and record brake lining thickness	
880	Inspect brakes/drums/rotors/springs/s-cam bushings	
890	Inspect air brake chambers-mounts/rods/clamps	
900	Inspect air brake hoses-rubbing/leaks/cracks	
910	Brake stroke/motion check and measurement-if applicable	
920	Check wheel seals	
930	Inspect air tank mounts	
940	Drain air tanks-test all check valves for function	
950	Inspect and lube drive line	
960	Inspect driveshaft loop	
970	Check ZF transmission oil level	
980	Check differential for leaks and fluid level	
990	Inspect tag axle steering mechanism/locks	
1000	Check tag axle clamps/bolts	
1010	Operate lift and verify lift is operating properly and level	
1020	Check lift for hydraulic leaks	
1030	Check lift hydraulic oil level	
1040	Lubricate chain,all pivot points,rollers and pins	
1050	Inspect wheelchair lift door and lights	
AREA 600 (LUBRICATION AND FLUID SERVICE)		
1060	Check king pins for wear and lubricate	
1070	Check unitized wheel bearings for play	
1080	Grease chassis/steering/drive line	
1090	Lube all engine compartment grease fittings	
1100	Change oil and filters	
1120	Take oil sample	
1130	Change fuel filters	
1140	Check air filter minder-change air filter if indicated	
1150	Test engine coolant/additives	
1160	Replace coolant filter	
1170	Service air dryer/replace cartridge and purge valve	
1180	Check all fluid levels	
1190	Check fan drive gear box oil level. Replace oil if contaminated	
1200	Service all AC filters-main-driver's-stepwell-auxillary	
1210	Inspect AC motors for operation-check brushes if applicable	
1220	Check AC and heater operation-driver and passenger	
1230	Inspect AC hose condition-cracks/pinching/wetness	
1240	Check AC compressor oil for condition and proper level	
1250	Check refrigerant level	
1260	Cycle engine heater	
1270	Check condenser coil for condition. Wash condenser	
1280	Steam clean engine as needed	
1290	Clean radiator/charge air cooler	



RECORD APPLIED AND UNAPPLIED BRAKE STROKE



RECORD BRAKE PAD/LINING THICKNESS

VEHICLE PROHIBITED FROM SERVICE UNTIL OOS DEFECTS REPAIRED	YES	NO	PM WO #	Date
				Bus
			PM FOLLOW UP WO#	Miles

PM DEFECTS

List defects and if repaired describe repair.

Person making repair must place initials in the corresponding box.

Repaired
on PM WO
or on PM
Follow-up
WO

Create
Service
Request in
FA

Listed
defect does
not need
repair

1				
R				
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R				
13				
R				
14				
R				

FA ___ FILE ___ FIRESTONE/BRIDGESTONE ___ MICHELIN ___ (OFFICE USE ONLY)

STEEL WHEELS ___ **BUS TIRE INVENTORY**

BUS #: _____ DATE: _____
LIFETIME MILEAGE _____ HUB MILEAGE _____

ALUMINUM WHEELS _____
B=BRIDGESTONE F=FIRESTONE
M=MICHELIN
ANY OTHER TYPE TIRE MARK AS NEEDED

B
A
C
K

L/T CS

L.O.D. CS

CS L/F F

SPARE = Y N R

L.I.D. CS

SPARE ON WHEEL= Y N O

R.I.D. CS

CS STEEL= Y N T

ALUMINUM= Y N

R/T CS

R.O.D. CS

CS R/F

*****NOTE IF SPARE TIRE WAS INSTALLED AT TIME OF THIS INVENTORY

Y

N

Bus # : _____ Date : _____ Mileage: _____

WHEEL TORQUES (ALL WHEELS MUST BE TORQUED)

	FRONT AXLE	
	LEFT	RIGHT
INITIAL/SIGN		
ANY MOVEMENT? (YES OR NO)		

DRIVE AXLE	
LEFT	RIGHT

JED ON EVERY PM)

TAG AXLE	
LEFT	RIGHT

ATTACHMENT 7



Coach USA®

Employee Handbook



Employee Handbook

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Employee Handbook

Coach USA will provide safe, reliable, cost effective transportation for our customers; a safe, rewarding work environment for our employees; and a reasonable return for our investors.

Our Core Values

- Listening to our customers and doing everything it takes to meet their expectations
- Empowering each other, showing concern for other's well-being and respect for our talents and achievements
- Continuously improving by always doing the right thing safely and efficiently



Employee Handbook

Welcome to Coach USA. Coach USA is a company committed to providing safe and superior transportation service to its customers and an enjoyable place to work to its employees. We believe that every job is important and we respect the contribution of each individual. We appreciate the different personalities and backgrounds among ourselves and we believe this diversity makes us a stronger team.

Our company's history is a proud culmination of family operations, some having been in continuous operation since the 1930s, passed down through several generations before becoming a part of the Coach USA family. We encourage you to read more about our company at www.coachusa.com.

This employee handbook provides general information about our policies and procedures. Please review the contents carefully and keep your handbook for future reference. Your immediate supervisor or General Manager will be happy to answer any questions you may have.

Whether you've been employed by Coach USA for several years, or you have just been hired, we want you to know that we are proud of the Company and people, and we want you to be proud too.

Welcome aboard!



Employee Handbook

Our Environment

Coach USA Reserves The Right To Change, Modify And / Or Discontinue Any Of The Policies Contained Herein With Or Without Notice.

If You Are An Employee Represented By A Collective Bargaining Agreement, Refer To Your Collective Bargaining Agreement For Any Topics In This Handbook That Are Also In Your Collective Bargaining Agreement. In The Event Of A Conflict Between The Collective Bargaining Agreement And This Handbook, The Collective Bargaining Agreement Is The Controlling Policy.

Open Door Policy

Coach USA believes the open discussion of ideas, suggestions, problems and complaints is important to our mutual success. To ensure open communications, we maintain an Open Door policy.

Employees should ordinarily attempt to resolve any problem with co- workers informally by communicating their concerns directly to the individual. In most circumstances, problems among employees can be resolved between the individuals through open communication and consideration.

In cases where direct communication has not resolved the problem or any employee is uncomfortable dealing with the issue directly, employees may use the open door policy and problem solving procedure. In order to ensure prompt and constructive problem solving, employees are encouraged to follow this procedure:

Step 1: Discuss the problem with your immediate supervisor.

Step 2: If a satisfactory resolution is not reached within a reasonable time, take your concerns to the General Manager.

Equal Employment Opportunity Policy

Coach USA is committed to providing equal employment opportunities to all individuals without unlawful regard to race, color, religion, sex, national origin, age, disability or any other characteristic protected by federal, state or local law.

Coach USA will make reasonable accommodations for qualified individuals with known disabilities, unless doing so would result in an undue hardship. An employee with a disability for which reasonable accommodation is needed should contact a manager to discuss possible accommodations.



Employee Handbook

Employment at Will Policy

This Handbook Does Not Create An Employment Contract Between Any Coach USA Subsidiary And Its Employees. Either You Or Coach USA May Terminate The Employment Relationship At Any Time, With Or Without Cause And With Or Without Notice. No Policy Or Procedure In This Handbook Shall Vest Any Right To You Or Any Other Employee, Guarantee Employment For Any Period Or Create Or Contribute In Any Way To A Legal Cause Of Action Against Coach USA. No Manager Or Representative Of Coach USA, Other Than An Officer Of The Company, Has Authority To Enter Into Any Agreement For Employment.

Prohibited Harassment, Discrimination and Retaliation Policy

Coach USA is committed to providing a work environment free of harassment, discrimination and retaliation. Coach USA maintains a strict policy prohibiting harassment, discrimination and retaliation because of race, color, religion, sex, national origin, age, disability, veteran status, sexual orientation or any other basis protected by federal, state or local laws or ordinances. Discrimination consists of the failure or refusal to hire or to discharge any individual, or to otherwise discriminate against any individual with respect to his or her compensation, terms, conditions or privileges of employment because of such individual's race, color, religion, sex, national origin, age, disability, veteran status, sexual orientation or any other basis protected by federal, state or local laws or ordinances, or to limit, segregate or classify employees or applicants for employment in any way which would deprive or tend to deprive any individual of employment opportunities or otherwise adversely affect his status as an employee, because of such individual's race, color, religion, sex, national origin, age, disability, veteran status, sexual orientation or any other basis protected by federal, state or local laws or ordinances. Any such harassment or discrimination is strictly prohibited.

This policy applies to all persons involved in the operations of Coach USA and prohibits harassment and discrimination by management employees, supervisors, coworkers, outside vendors and customers and persons doing business with or for the Company.

Harassment and discrimination in any form, including verbal, physical and visual conduct, threats, demands and retaliation that is based upon a person's protected status is prohibited.



Employee Handbook

Prohibited harassment on the basis of sex, race, and color, national origin, religion, disability, sexual orientation, veteran status or any other protected basis, includes, but is not limited to:

- Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct based upon sex when: (1) submission to such conduct is made either explicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment
- Verbal, written or email conduct such as epithets, derogatory comments, slurs, unwanted sexual advances or invitation; "teasing," jokes, name-calling or derogatory or patronizing comments
- Visual conduct, such as foul or obscene derogatory posters, photography, cartoons, drawings, leering or gestures
- Physical conduct such as assault, unwanted touching, pinching, grabbing, poking, blocking of normal movement or interfering with work, or brushing against another's body, directed at you because of your sex or other protected basis
- Threats or demands to submit to sexual requests in order to keep your job or to avoid some other loss or offers of job benefits in return for sexual favors
- Retaliation for having reported or threatening to report harassment or discrimination

It is prohibited for males to sexually harass females or other males and for females to sexually harass males or other females.

Reporting / Investigation / Resolution Procedures

Coach USA strictly prohibits harassment, discrimination and retaliation. If you think you are being harassed, discriminated or retaliated against on the job, or if you are aware of an incident of

Discrimination, harassment or retaliation involving another employee, you should use the procedure outlined in this Policy to file a complaint and have it investigated.



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Coach USA encourages all employees to report any incidences of harassment or discrimination immediately so that complaints can be quickly and fairly resolved and relevant witnesses can be interviewed while the events are still fresh in their memory.

You may have a claim of harassment even if you have not lost a job or some other economic benefit. You should tell the individual to stop the behavior that you feel may be harassment or discrimination if at all possible. You may and should report such activities even though you are not the target of the offensive conduct.

Provide a complaint, preferably in writing, to any General Manager, Regional Vice President, your local or Regional Human Resources Department or Coach USA corporate officer as soon as possible after the incident you feel may be harassment or discrimination. Reporting discrimination, harassment or retaliation to any other employee or a co-worker is not proper. The Company takes these matters seriously, and as a result, it is important that you report any discrimination, harassment or retaliation strictly in accordance with this procedure so that the Company can address the issue properly.

Your complaint should be specific and should include the details of the incident or incidents, the names of the individuals involved and the names of any witnesses.

Coach USA will immediately undertake an effective, thorough and objective investigation of the allegations and attempt to resolve the situation. This investigation will be completed, and the determination regarding the alleged harassment, discrimination or retaliation will be made and communicated to you as soon as practical; however, please be aware that you will not be informed what action(s) were taken. You will only be informed whether your allegation was substantiated and that appropriate action(s) were taken. If the discrimination, harassment or retaliation continues, you should report the issue in accordance with the procedures outlined in this policy. Investigation of a harassment or discrimination complaint may include, but is not limited to, interviewing the complaining and accused parties, as well as other individuals, to obtain sufficient information upon which to make an assessment of the situation. While we will make every effort to be sensitive to privacy issues, in the course of the investigation we will discuss relevant information with appropriate parties on a need-to-know basis to the extent possible consistent with the investigation.

If Coach USA determines that harassment, discrimination or retaliation has occurred, we will take effective, remedial action commensurate with the severity of the offense. Appropriate action also will be taken to deter any future harassment, discrimination or retaliation.



Employee Handbook

Liability for Harassment, Retaliation or Discrimination

Any employee of Coach USA, whether a co-worker or manager, who is found to have engaged in, prohibited harassment, discrimination or retaliation is subject to disciplinary action, up to and including immediate discharge from employment. Any employee, who engages in prohibited harassment, discrimination or retaliation, including any manager who knew about the harassment, discrimination or retaliation, but took no action to stop it, may be held personally liable for monetary damages and is subject to disciplinary action. The Company does not consider conduct in violation of this Policy to be within the course and scope of employment or the direct consequence of the discharge of one's duties. Accordingly, to the extent permitted by law, the Company reserves the right not to provide a defense or pay damages assessed against employees for conduct in violation of this Policy.

Coach USA will not retaliate against you for filing a complaint and will not knowingly permit retaliation by management, supervisors or your co-workers or any employee of Coach USA. Prohibited retaliation includes, but is not limited to, demotion, suspension, failure to make impartial employment decisions negatively affecting working conditions or otherwise denying any employment benefit. If you feel you are being retaliated against in any manner whatsoever, please report this immediately to any member of management or Human Resources, in accordance with the procedures outlined in this Policy.

Additional Enforcement Information

You should be aware that in addition to Coach USA's internal complaint procedure, the federal Equal Opportunity Employment Commission (" EEOC") investigates and may prosecute complaints of prohibited harassment, retaliation or discrimination in employment. If you think you have been harassed or discriminated against, or that you have been retaliated against for resisting or complaining, you may file a complaint with the EEOC. The nearest EEOC office is also listed in the phone book.

There are state agencies in many states that investigate and may prosecute complaints of prohibited harassment, retaliation and discrimination in employment. If you think you have been harassed or discriminated against, or that you have been retaliated against for resisting or complaining, you may file a complaint with the appropriate state agency in the state where you work. The local EEOC office can provide you with the name and address of the appropriate state agency if one exists in the state where you are employed.

The EEOC and state agencies serve as neutral fact finders and attempt to help the parties voluntarily resolve disputes.



Employee Handbook

Workplace Violence Policy

Coach USA is concerned about the well-being and personal safety of its employees and anyone doing business with Coach USA. Coach USA consequently strictly prohibits workplace violence. Acts of violence and / or threats of violence whether expressed or implied toward individuals in the workplace are prohibited and will not be tolerated. All reports of incidents will be taken seriously and will be addressed appropriately. This prohibition against threats and acts of violence applies to all persons involved in the operation of Coach USA, including but not limited to, personnel, contract and temporary workers and anyone else on Coach USA property.

Workplace violence is any conduct that is severe, offensive or intimidating enough to make an individual reasonably fear for his / her personal safety or the safety of family, friends or property. Examples of workplace violence include, but are not limited to, threats or acts of violence of behavior that causes a reasonable fear or intimidation response that occurs:

- On Coach USA premises, no matter what relationship is between Coach USA and the perpetrator or victim of the behavior
- Off Coach USA premises, where the perpetrator is someone who is acting as an employee or representative of Coach USA at the time, where the victim is an employee who is exposed to the conduct because of work for Coach USA or where there is a reasonable basis for believing that violence may occur against the targeted employee or others in the workplace

Where an employee is convicted of a crime of violence or threat of violence under any criminal code provision, Coach USA reserves the right to determine whether the conduct involved may adversely affect the legitimate business interests of Coach USA, and may implement corrective action up to and including discharge as a result. Any employee convicted of such a crime must report the conviction to

Coach USA absent a court order to the contrary. Failure to do so is a violation of this policy and subjects the employee to disciplinary action including termination from employment.

In the event that an employee believes that a threat or act of violence has been made against that employee or others, the employee should report the details immediately to his / her immediate supervisor, the General Manager or the regional or corporate Director of Human Resources.

A 9-1-1 call may be appropriate first, in the good judgment of the employee or managers involved. Under this Policy, decisions may have to be made quickly to prevent a threat from being carried out, a violent act from occurring or a life-threatening situation from developing.



Employee Handbook

Nothing in this policy is intended to prevent quick action to stop or reduce the risk of harm to anyone, including requesting immediate assistance from law enforcement or emergency response resources.

Failure to report any threats or acts of violence is a violation of this Policy. In addition, retaliation against anyone for reporting an actual or suspected violation of this Policy in good faith will not be tolerated. Any complaints about retaliation may be reported in the same manner as violations of this Policy are to be reported.

Weapon Free Workplace Policy

To ensure that Coach USA maintains a workplace safe and free of violence for all employees, the Company prohibits the possession or use of perilous weapons on company property. A license to carry the weapon on company property does not supersede company policy. Any employee in violation of this Policy will be subject to disciplinary action, up to and including termination. All company employees are subject to this provision, including but not limited to, personnel, contract and temporary workers and anyone else on Coach USA property. The only exception to this Policy is security vendors or employees specifically hired or engaged to provide armed security services at a Coach USA location. Complete disclosure to and approval by the General Manager of any weapons to be carried by security personnel must be made prior to arriving on site with any weapons.

“Company property” is defined as all company-owned or leased buildings and surrounding areas such as sidewalks, walkways, driveways and parking lots under the Company's ownership or control. This Policy applies to all company-owned or leased vehicles and all vehicles that come onto company property.

“Dangerous weapons” include, but are not limited to, firearms, explosives, knives and other weapons that might be considered dangerous or that could cause harm. Employees are responsible for making sure that any item possessed by the employee is not prohibited by this Policy.

Coach USA reserves the right at any time and at its discretion to search all company-owned or leased vehicles and all vehicles, packages, containers, briefcases, purses, lockers, desks, enclosures and persons entering its property for the purpose of determining whether any weapon has been brought onto its property or premises in violation of this Policy. Employees who fail or refuse to promptly permit a search under this Policy will be subject to discipline up to and including a termination.



Employee Handbook

Employee Dress Code Policy

Our employees should present a professional, businesslike image to customers, prospects, and the public. Your personal appearance reflects the professional quality and high standards of Coach USA.

A great emphasis is placed on safety at Coach USA. Acceptable attire for drivers that do not have a specific uniform consists of a shirt, pants and appropriate footwear. The Policy prohibits open toed shoes, shorts, tank tops, skirts and t-shirts with inappropriate graphics or language. Appropriate footwear should have non-slip rubber soles without high heels. Any additional requirements will be provided by your supervisor.

Acceptable attire for all non-drivers (dispatchers, office staff, mechanics, detailers, etc.) is dependent upon location and department. Please contact your immediate supervisor for special dress requirements.

Good personal hygiene is a must. You are expected to maintain a neat, clean appearance at all times. Clothing that is stained, frayed or holey is not acceptable. Clothing should not be overly tight or revealing. Clothing must cover undergarments. Perfume, cologne and aftershave lotion should be used moderately or avoided altogether, due to possible sensitivity (allergies, illness) of your passengers and / or co-workers.

Attendance Policy

Your value as a member of our team is determined in part by your dependability to be at work on time, as scheduled. We expect you to report for work promptly and on time whenever scheduled and have regular attendance. Absences create a hardship on your co-workers and can affect the Company's performance. When you know in advance that you will need to be away from work, please give your immediate supervisor as much notice as possible.

We realize that unforeseen circumstances may cause you to be absent from work for all or part of a day. However, you may put your employment with Coach USA in jeopardy if absences or tardiness becomes excessive. Habitual or excessive absence or tardiness will be cause for disciplinary action up to and including termination.

When returning to work after an illness or injury, a written medical release from your doctor may be required before starting work. If you are given a conditional medical release, your doctor must state what the conditions of the partial release are and any specific job limitations.



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If you are absent from work for three consecutive days without notice, your job will be considered abandoned and we will consider you to have voluntarily quit your job.

Use of Coach USA Property and Technology

Coach USA Property Use Policy

The intent of this Policy is to ensure that all Coach USA property is kept in the best possible working condition and to ensure proper utilization. All Coach USA property may be used solely for business purposes. Coach USA property is defined as any piece of equipment, furnishing, vehicle, building or supply that is leased, owned or in the care of Coach USA. This includes, but is not limited to, computers, telephones, cellular phones, copiers, faxes, Internet services, printers, the building, vehicles, desks, file cabinets, computer disks, electronically stored data, etc.

Conducting personal business utilizing Coach USA property is prohibited. Examples of improper conduct include, but are not limited to, excessive use of the telephone or cellular phone for personal business, use of the building for personal use or gain, use of Coach USA vehicles for personal reasons, etc.

Employees are expected to exercise care in the use of Coach USA's equipment and property and use such property only for authorized purposes. Loss, damages, theft or misuse of Coach USA property should be reported at once.

Upon termination of employment, the employee must return all Coach USA property, uniforms, equipment, work product and documents in his or her possession or control.

No Expectation of Privacy

All Coach USA property is to assist employees in the performance of their jobs. Users should not have an expectation of privacy. All Coach USA property is subject to being searched and the contents held by Coach USA personnel at any time.

This sets forth the Policy of Coach USA, and each of its direct and indirect subsidiaries, (collectively the "Coach USA") on the proper use of the Coach USA computer systems, e-mail, instant messenger, telephones, voicemail, radios, pagers, facsimiles and Internet access (collectively the "Computer & Communication System"). This Policy may be amended from time-to-time.



Employee Handbook

Coach USA Computer & Communication System

The Computer & Communication System is provided to employees at the Coach USA's expense to assist them in carrying out Coach USA business and performing their job responsibilities and duties. It is intended for authorized business use.

Coach USA owns, maintains and is responsible for the Computer & Communication System. In the course of their jobs, employees may use it to communicate internally with co-workers or externally with customers, consultants, vendors and other business acquaintances. Coach USA provides its employees with the Computer & Communication System to facilitate and assist employees in carrying out Coach USA business. The Computer & Communication System is configured, maintained and supported by Coach USA's Information Technology team (IT). All mail access and logons are assigned by IT. The primary use of the Computer & Communication System is to conduct Coach USA business. It is not to be used for personal business except as described below. Coach USA treats all information transmitted through or stored in its Computer & Communication System, including e-mail messages, as Coach USA business information. All e-mail messages are and remain the property of Coach USA. They are not the private property of any employee.

Coach USA Access to E-mail

Employees have an e-mail account because Coach USA sees it as necessary for their work. It is a tool Coach USA provides to enable you to do your job. Just as with the telephone, Coach USA may allow employees to use e-mail for personal correspondence. This is a privilege, not a right. E-mail should not be used for any other purposes than work and limited personal reasons. If you choose to use Coach USA e-mail for personal purposes, you have no right to expect privacy. Personal e-mail is subject to all the same policies as business e-mail.

Coach USA has the capability to access, review, copy, modify and delete any information in the Computer & Communication System, including e-mail and other files. Coach USA also has the right to access, review, and copy, modify or delete all such information as it deems appropriate. Information and e-mail created by employees using the Computer & Communication System for personal purposes will be treated the same as other information and e-mail; i.e., Coach USA has the right to access, review, copy, modify, delete or disclose such information. Accordingly, employees should not use the system to send, store or receive any personal information they wish to keep private.

When Using The Computer & Communication System, Whether For Business Purposes Or Personal Use, Employees Should Have No Expectation That Any Communication Or



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Information Transmitted over the Computer & Communication System, Or Stored on the Computer & Communication System Is or Will Remain Private (Except business communications with attorneys representing Coach USA).

Notwithstanding Coach USA's right to retrieve and read any e-mail messages, such messages should be treated as confidential by other employees and accessed only by the intended recipient. Employees are not authorized to retrieve and read any e-mail messages that are not sent to them. Any exception to this Policy must receive prior approval from the CIO or CEO.

Computer Software

Only personnel authorized by the Information Technology (IT) team are authorized to make hardware repairs or modifications on Coach USA computers. Only software approved by the IT department is to be loaded into Coach USA owned computer equipment. This includes games, graphics packages or any other non-standard software. Coach USA will provide antivirus software including regular updates for all PCs and it is Coach USA policy that this software be installed and operating at all times to protect the Computer & Communication System assets of Coach USA.

Confidential Coach USA Information

Everyone must exercise caution in transmitting confidential Coach USA information because of the reduced effort required in electronic communication. Confidential Coach USA information should never be transmitted or forwarded to outside individuals or companies that are not authorized to receive the information. Confidential information should not be sent to other employees inside Coach USA who do not need to know the information. Always use care in addressing e-mail messages to make sure that the messages are not inadvertently sent to the wrong person or sent outside Coach USA. Exercise care when using distribution lists and take measures to ensure that the lists are current. The confidentiality of any message should not be assumed. Even when a message is deleted, it is still possible to retrieve and read that message. Further, the use of passwords for secrecy does not guarantee confidentiality.

Attorney-Client Privileged Information

Some e-mail messages may constitute confidential privileged communications between Coach USA and its attorneys. Do not forward messages from counsel to any other party without counsel's approval. Do not send copies of messages to counsel to other employees who are not involved with the subject of the messages without counsel's approval.



Employee Handbook

E-mail Etiquette

Your e-mail messages may be read by someone other than the person to whom you send them. Someday they may have to be disclosed to outside parties or a court in connection with litigation. Accordingly, your e-mail messages should be courteous, professional and businesslike.

Prohibited Uses

The Computer & Communication System is intended to support and promote Coach USA's business objectives. It is an asset of Coach USA. Use of the Computer & Communication System is a privilege, not a right, and may be revoked. Therefore, employees may not:

- Play games on computers
- Intentionally waste limited computer resources
- Engage in activities which disrupt the business environment of Coach USA
- Engage in actions which damage computers, the Computer & Communication System or computer networks
- Use the Computer & Communication System for commercial purposes, for personal gain or profit or to engage in illegal activity
- Use the Computer & Communication System in violation of Coach USA policies, including this Computer, Communication, Internet and E-mail Usage Policy
- E-mail and other messages, whether created inside Coach USA or created outside Coach USA and transmitted within Coach USA or from Coach USA to other sites, can generate claims of defamation, harassment and discrimination. Therefore Coach USA employees may not:
 - Use the Computer & Communication System to engage in any communication that is in violation of any Coach USA policy, including those relating to Employment Practices
 - Use the Computer & Communication System to create, transmit or display: Defamatory, sexually explicit, obscene, offensive or harassing messages, images, cartoons, jokes or pictures
 - Messages that disclose personal information without authorization
 - Propositions, requests for dates or love letters
 - Profanity, obscenity, slander or libel
 - Ethnic, religious or racial slurs
 - Any other message that could be construed as harassment or disparagement of others based on their sex, race, sexual orientation, age, national origin, disability, religious or political beliefs



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An employee accessing the Internet from a Coach USA site is responsible for all on-line activities which take place through the use of his or her login and password. Those with Internet access privileges may not:

- Access inappropriate websites (including those involving gambling, pornography or obscene materials or those that display defamatory, sexually explicit, obscene, offensive or harassing messages, images, cartoons, jokes or pictures, display profanity, obscenity, slander, libel, ethnic, religious or racial slurs)
- Obligate Coach USA financially to any commercial web-sites
- Use the Internet from a Coach USA site to engage in the practice of moonlighting or for any commercial purposes, advertising or other similar activities

Employees are strongly discouraged from posting items on blogs ("blogging") while on Coach USA time.

The following rules govern any postings employees make to blogs at any time:

- Employees may not post confidential Coach USA information, including, but not limited to, non-public financial information. Doing so constitutes a violation of this Policy and the Coach USA policy covering protection of confidential information
- Employees may not reproduce or use any of Coach USA's trademarks without the written permission of Coach USA's CEO
- Employees should not refer to Coach USA or suggest that they represent Coach USA its officers, employees, owners, customers or services in any way while participating in or posting on a blog. Employees should not use blog postings to attack Coach USA, its officers, employees, owners, customers or services

Storing and Deleting Emails

Coach USA strongly discourages the storage of large numbers of e-mail messages. E-mail messages frequently contain confidential Coach USA information and it is desirable to limit the number, distribution and availability of such messages to protect Coach USA's information. Also, retention of messages fills up large amounts of storage space on the network and personal computers and can slow the performance of both the network and individual personal computers. Finally, in the event that Coach USA needs to search the network, backup tapes, or individual personal computers for genuinely important documents, fewer documents to be searched makes the search more economical. Accordingly, employees are to promptly delete any e-mail messages they send or receive that no longer require action or are not necessary to an ongoing project. Employees should audit their stored e-mail messages regularly to identify messages that are no longer needed and that should be deleted.



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The Company will retain electronic mail and attachments in inboxes and folders on its central e-mail servers for 180 days after e-mails have received or sent. All e-mail and attachments remaining on central e-mail servers after 180 days will be automatically deleted. The standard e-mail account size will be limited to 300 MB. When an account exceeds this limit due to having too many saved e-mail messages and attachments, the account will not be able to send or receive further messages until the employee cleans out e-mail messages and attachments from that account. Any exceptions to this Policy must receive prior approval from the CIO or CEO.”

Audits

To ensure that employees comply with this Policy, Coach USA may conduct periodic audits of the Computer & Communication System including audits of individual personal computers, disks or backup tapes.

Employees Who Violate These Policies Are Subject To Discipline Up To And Including Termination. It Is Each Employee’s Responsibility To Ensure That The Use Of This Technology Is For Appropriate Business Purposes.

Record Retention Policy

Coach USA maintains a Record Retention Policy to support the archival and retrieval of Coach USA documents and information to maintain compliance with all legal and regulatory requirements. A copy of the current Record Retention Policy may be obtained from Coach USA’s General Counsel.



Employee Handbook

Code of Ethics and Conduct Policy

Obey All Laws, Rules and Regulations Governing Our Business

Coach USA is subject to federal laws and regulations and the laws and regulations of the states and cities where it operates. It is the Policy of Coach USA that all laws, rules and regulations are complied with fully and completely. If it is unclear whether an action or activity is a legal or ethical violation, contact the General Counsel of Coach USA immediately for advice. Any incident or situation that violates the law or this policy should be immediately reported to the General Counsel.

Be Honest, Truthful, Fair and Trustworthy in All Coach USA Activities and Relationships

Coach USA expects each of its employees to treat customers, suppliers and fellow employees with respect and honesty. This includes providing our constituents with information that is accurate, complete, objective, timely, relevant and understandable. Trust is a cornerstone of our business.

Respect and Protect Coach USA Assets

Assets are anything of value owned by Coach USA. All Coach USA employees are expected to be the custodian of those assets. Employees are responsible to maintain company assets in good condition and to protect them from loss. This includes real assets like operating equipment of all kinds and real estate. It also includes so called "soft assets" such as intellectual property, customer lists and other confidential information owned by the Company. Coach USA assets of any kind, but including such assets as telephones, PCs, e-mail, copiers, faxes, should not be used for personal benefit.

Avoid All Conflicts of Interest Between Work and Your Personal Affairs

All company employees are expected to act with total objectivity with regard to Coach USA's business. Accordingly, it is improper for a Coach USA's employee to be in a position where their personal interests conflict, or appear to conflict, with Coach USA's interests. Coach USA's employees should not use their position with Coach USA or the assets or influence of Coach USA for their personal benefit. The acquisition or retention of a financial interest (other than minimal stock holdings) in any entity that does business with Coach USA or competes with Coach USA is prohibited. Employees should not engage in any business or secondary employment, which, because of the demands on their time and interest, interferes with their obligations and responsibilities at Coach USA.

If an employee believes that a conflict of interest has developed or may develop, it should be promptly reported to the employee's immediate supervisor or a Coach USA officer.



Employee Handbook

Promote Fair Employment Practices for All Coach USA Employees.

Coach USA supports and adheres to laws and regulations dealing with fair employment practices. Employment discrimination in our workplace based on sex, race, age, religion, national origin or sexual preference will not be tolerated.

Use Your Best Efforts to Maintain a Safe Workplace and to Protect the Environment

Coach USA believes in and supports the laws designed to keep our workplace safe and designed to protect the environment. If you believe that an unsafe condition exists in a Coach USA workplace, bring it immediately to the attention of your supervisor. If an environmental accident takes place, report it pursuant to Coach USA policy and immediately take action to address the problem.

Promote an Ethical Culture for All Coach USA Employees

Coach USA expects all of its employees to conduct themselves ethically at all times and to encourage and support that behavior in their fellow employees.

Violation of the Coach USA Code of Ethics and Conduct may subject an employee to disciplinary action up to and including termination.

Conflict of Interest Policy

Conflict of interest can compromise an employee's business ethics and adversely affect the legitimate business interest of Coach USA and its stakeholders. At Coach USA, a conflict of interest is any activity that is inconsistent with or opposed to Coach USA's best interests or that gives the appearance of impropriety. The way to identify a conflict is to decide whether there is potential for even the appearance of divided loyalty on the part of the Coach USA employee. Common areas where conflicts of interest may occur are described below. Although these areas focus on employees, the activities of employees' family members, household members and other third parties in significant relationship with employees should also be examined for any circumstances which may give rise to a conflict of interest, impropriety, ethical or legal risks, whether real or perceived, for Coach USA or the Coach USA employee. (Examples of significant relationships include domestic partners, dating relationships and business partnerships outside Coach USA.)

Payments to or from Third Parties

All Coach USA employees must pay for and receive only that which is proper. Coach USA will make no payments or promises attempting to influence another's acts or decisions, and the Company will give no gifts beyond those extended in normal business dealings. At a minimum, Coach USA will observe all government restrictions on gifts and entertainment. Tipping is a normal business practice.



Employee Handbook

Interests in Other Businesses

Coach USA employees must avoid any direct or indirect financial or other relationship that could cause divided loyalty. This type of relationship could include, for example, membership on the board of directors of an outside commercial or nonprofit enterprise. Coach USA employees must receive written permission from the Coach USA CEO before beginning any employment, business, consulting, financial or other relationship with another company if the proposed activity affects in any way Coach USA's present or reasonably anticipated future business or relates to the services performed by the employee on behalf of Coach USA. This does not mean, however, that family members are precluded from being employed by one of Coach USA's customers, competitors or suppliers.

Gifts and Entertainment

Coach USA employees must not give to or receive from any person associated with Coach USA's vendors or customers' valuable gifts, including gifts of equipment or money, discounts or favored personal treatment. Such gifts (including advertising novelties, favors and entertainment) are allowed only when the following conditions are met:

- They are consistent with our business practices
- They are of limited value (\$100 or less)
- They do not violate any applicable law
- Public disclosure would not embarrass Coach USA

This is not intended to preclude Coach USA from receiving or evaluating appropriate complementary products and services. It is also not intended to preclude Coach USA from making a gift of equipment or services to a company or an organization, provided that the gift is given openly, with full knowledge by the Company or organization, and is consistent with applicable law and Coach USA's business interests. It is also not intended to preclude Coach USA's attendance at social functions, provided such attendance is approved by management and does not present a conflict of interest or the appearance of a conflict of interest.

Outside Vendors (including temporary agencies and contractors)

When dealing with any outside vendors or potential vendors, Coach USA employees must maintain the highest ethical standards. Only arm's-length transactions should be conducted.

Employees of outside vendors are also expected to maintain the highest ethical standards, including maintaining the confidentiality of any Coach USA and third-party information that they receive.



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The examples above do not list all possible conflicts of interest, but do illustrate some of the conflicts of interest Coach USA employees must avoid. Ultimately it is the responsibility of each individual to avoid any situation that would even appear to be a conflict of interest or to be improper. Each employee should feel free to discuss any potential conflicts of interest with his or her manager, Human Resource representative or the CEO, as appropriate.

Contact Information

Pay Frequency

Coach USA pays its employees on a bi-weekly basis for Bismarck and Pocatello based employees and on a semi monthly basis for Gillette charter operations by check or direct deposit. Direct deposit is a benefit that Coach USA provides to its employees. We encourage all employees to select this easy and accessible way of depositing your paycheck.

If you think there is an error on your paycheck, contact your immediate supervisor or the payroll department.

Personal Data Changes

It is important for Coach USA to have your records accurate and up to date. If you have any changes in address, home phone number, emergency contact phone number, nearest living relative, marital status or number of dependents, please report these immediately to your supervisor.

Employment Status

Probationary Employee

All employees who have been employed 90 days or less are classified in this category until successful completion of this period. A formal review will be given after 90 days of service.

During this period, you will have the opportunity to learn about the objectives, history and nature of our business as well as the requirements of the work you will be performing. During this same period we will have the opportunity to observe your skills, abilities, attitudes, attendance and potential for contributing to our mutual welfare. Coach USA reserves the right to extend the duration of the probationary period when such an extension is determined to be appropriate.

Full-Time Employee

Those employees who have successfully completed the 90-day Probationary Period and work 30 or more hours per week are Full- Time Employees.



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Part-Time Employee

Those employees who have successfully completed the 90-day Probationary Period and work less than 30 hours per week are Part- Time Employees.

Accident and Injury Reporting

Federal regulations require Coach USA to report all accidents, injuries and occupational illnesses. If you are injured in the course of performing your job, you must report that accident or injury, no matter how slight, to your supervisor immediately. Your supervisor will report the accident or injury to management. Failure to properly report an injury on a timely basis may disqualify you from receiving any applicable workers' compensation benefits.

The list of doctors available to contact is posted on the employee bulletin board. Without exception, you should go or be transferred to one of the doctors or medical facilities listed on this posting. Contact your safety manager for further assistance.

Background Checks and Investigations

Coach USA recognizes the importance of maintaining a safe and productive workplace with honest, trustworthy, qualified, reliable and non-violent employees who do not present a risk of serious harm to their co-workers or others. For the benefit of all employees and Coach USA, in furthering these interests and enforcing Coach USA's policies, Coach USA may perform, or request that third parties perform "background checks" or other types of investigations. These background checks and investigations may be performed by Coach USA in whole or in part at Coach USA's discretion.

Background checks and investigations performed for Coach USA may include the use of consumer reporting agencies, which may gather and report information to Coach USA in the form of consumer or investigative consumer reports. Such reports, if obtained, may contain information concerning your credit standing or worthiness, credit capacity, character, general reputation, personal characteristics or mode of living. The types of reports that may be requested from consumer reporting agencies under this policy include, but are not limited to, credit reports, criminal record checks, court record checks, driving records and / or summaries of educational and employment records and histories. The information contained in these reports may be obtained by a consumer reporting agency from private or public records sources or through personal interviews with your co-workers, neighbors, friends, associates, current or former employers or other personal acquaintances.

Pursuant to this Policy, Coach USA may request consumer reports, including record checks and investigative reports based on interviews, in connection with your application for employment or at any time during the course of your employment with Coach USA for the purposes of evaluating



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your suitability for employment, promotion, reassignment or retention as an employee. Coach USA may otherwise obtain such reports, both during and after your employment with Coach USA, for the purposes of evaluating, investigating or enforcing compliance with Coach USA's policies or in connection with responding to grievances or complaints, regardless of whether you remain in the employ of Coach USA at the time the report is requested.

Employees are expected to cooperate fully with this background check and investigation policy. Such cooperation includes, among other things, providing truthful and complete information in response to inquiries made by Coach USA or third party investigators during the course of investigations. Failure to cooperate in these respects, or any attempt to interfere with Coach USA's implementation of this policy, or the efforts to obtain relevant information, will result in discipline, up to and including termination from employment.

Solicitation and Distribution of Literature

Approaching fellow employees in the workplace regarding activities, organizations or causes regardless of how worthwhile, important or benevolent, can create unnecessary apprehension and pressures for fellow employees. This conduct is inappropriate. Coach USA has established rules, applicable to all employees, to govern solicitation and distribution of written materials during working time and entry onto the premises and work areas. All employees are expected to comply strictly with these rules:

1. No employee shall solicit or promote support for any cause or organization during his or her working time or during the working time of the employee(s) at whom the activity is directed
2. No employee shall distribute or circulate any written or printed material in work areas at any time during his or her working time or during the working time of the employee(s) at whom the activity is directed
3. Under no circumstances will non-employees be permitted to solicit or to distribute written material for any purpose on Coach USA's property

As used in this Policy, "working time" includes all time for which an employee is paid and / or scheduled to be performing services for Coach USA. It does not include break periods, meal periods or periods which an employee is not, and is not scheduled to be, performing services or work for Coach USA.



Employee Handbook

Work Rules and Standards

Work rules and standards regarding employee behavior are necessary for Coach USA's efficient operations and for the benefit and protection of the rights and safety of all. This section of your handbook summarizes some of our expectations and work rules.

Coach USA's identification of these rules does not alter the at-will nature of your employment. Described below are the basic rules we expect our employees to follow. This list is not all-inclusive, but should provide employees with an overview of what is expected of them.

Our Expectations

We expect you to be conscientious, reliable and honest in meeting the obligations and responsibilities of your job. Below are some of our basic expectations, and your basic responsibilities:

- Report to work punctually as scheduled and be at your work area, ready for work, at the assigned starting time
- Notify your supervisor or manager when you will be absent from work or unable to report for work on time
- Perform assigned tasks accurately, safely and efficiently
- Follow management's instructions concerning job related matters
- Comply with all company policies, procedures and safety regulations
- Provide all customers with the highest level of customer service
- Refrain from behavior or conduct deemed offensive or undesirable, or which is subject to disciplinary action

Examples of Conduct Not Permitted

In general, conduct that interferes with operations, brings discredit to the Company or is offensive to customers or co-workers is not tolerated. Examples of conduct that is not permitted and will subject to disciplinary action up to and including termination include:

- Using obscene, abusive, inflammatory or threatening language while on the job or on company property
- Harassing, sexually or otherwise, another employee or a customer
- Using alcoholic beverages while on the job or company premises or reporting for work while under the influence of alcohol
- The unlawful possession, sale, distribution or use of illegal drugs while on the job or company premises, or reporting for work while under the influence of drugs or narcotics
- Theft, misuse or willful destruction of company property or of another individual's property, or failure to report any knowledge of theft



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- Falsifying or altering employment records, employment information or any other company record or report
- Possession, use or distribution of firearms, knives or other weapons on company property or in company vehicles
- Unauthorized use of Coach USA's equipment, time, materials or facilities
- Provoking a fight or fighting during working hours or on premises owned or occupied by Coach USA
- Conviction of a felony or crimes which can be construed to indicate that the continued presence of the employee would constitute a hazard to employees, customers or property
- Insubordination, including but not limited to failure or refusal to obey the directions or instructions of any supervisor or member of management or the use of abusive or threatening language toward any supervisor or member of management
- Unreported absence of three consecutive scheduled workdays
- Failing to obtain permission to leave work for any reason during normal working hours
- Making or accepting excessive personal phone calls during working hours
- Violating any safety, health or security policy, rule or procedure of Coach USA
- Defacing company property or posting unauthorized materials on company property
- Failure to report for scheduled medical treatment relating to an on-the-job injury
- Failure to report an on-the-job injury or vehicular accident
- Excessive unavailability for work

These examples are illustrative of the types of behavior that are not permitted at Coach USA and are not intended to be all-inclusive. Other types of behavior or conduct could also lead to disciplinary action up to and including termination.

Disciplinary Action

Improper conduct or improper work performance, whether or not covered by the rules of conduct above or the policies in this manual, may be grounds for disciplinary action. Disciplinary action includes, but is not limited to, verbal, written or final warnings, suspension or immediate termination. The disciplinary actions listed are not applicable to all situations involving discipline. Different violations may be handled differently depending on the severity and impact of the violation. Coach USA reserves the right to determine the appropriate level of discipline and to immediately terminate the employment relationship without following any particular series of steps whenever it determines that such action should occur.



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Benefits

Coach USA provides a competitive benefits package for regular, full-time employees after a waiting period. Specific eligibility requirements and detailed information appear in the benefit package Coach USA provides for each benefit plan. Each benefit eligible employee is provided this information and may obtain additional information from the Benefit Administrator at his / her location.

Coach USA reserves the right to adjust and modify the benefits package at any time.

Making Changes to Your Benefits

The benefit elections you make during open enrollment may not be changed except under two conditions:

- Annual enrollment period
 - Elections may be changed during our annual enrollment period, usually held in March. If held in March, the elections are effective from April 1 through March 31 of the next plan year
- Qualified status changes
 - An employee may be eligible to make one or more changes to his / her benefit elections during the plan year if he/she experiences a qualified status change including, but not limited to, the following:
 - √ Birth / adoption of a child
 - √ Marriage or divorce
 - √ Employment status change (whether of the employee, or the spouse or the dependent of the employee)
 - √ Loss of eligible dependent status (such as a dependent child reaching the maximum age for coverage)
 - √ Employee's or eligible dependent's loss of coverage under another plan (such as the spouse's coverage being terminated)
 - √ Employee's or eligible dependent's gain of coverage under another plan (such as Medicare / Medicaid or spouse's plan)

If you believe you have experienced a qualified status change and would like to make a change to your benefits, you must notify the Human Resources department within 31 days from the date of the event. Otherwise, you will not be able to make changes to your benefit elections until the



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annual enrollment period for the next plan year, or you experience another qualified status change.

Please note that the completion of additional enrollment and / or change forms may be required. You will also be asked to provide appropriate documentation based on the nature of the status change (such as the marriage certificate, birth certificate, divorce decree, etc.). Please speak with the Human Resources department for more detailed information.

Time Off Policy

Coach USA recognizes that personal commitments can create a need for time away from work. Coach USA offers unpaid time off to all drivers under certain conditions. All requests for time off must be submitted in advance to the immediate supervisor. All requests must be approved by management prior to the employee taking the time off. Coach USA will make an effort to balance the needs of the employee with the needs of the business; however, each request will be considered individually and may not always be approved.

Driver Safety Bonus Plan

Coach USA believes a safe operating environment is of utmost importance. All Coach USA drivers are eligible for participation in the Safety Bonus Plan. Please see the actual Plan Document for details.

Holidays

Each year, the Company will observe five (5) holidays:

New Year's Day Independence Day Labor Day Thanksgiving Christmas Day

As we provide service 365 days per year, 24 hours a day, we must schedule work on observed holidays. All employees who work on these holidays are eligible for holiday pay. Hourly paid employees will be paid at 1.5 times their hourly rate of pay and pieces paid employees (mileage, wait time, daily, etc.) will receive an additional \$25.00 for that day of work.

Leave(s) of Absence – General Principles

No leave or combination of leave(s) of absence can exceed 90 consecutive calendar days. If you fail to return from any approved leave(s) within 90 consecutive calendar days, your employment will terminate. Employees with inactive files for longer than 90 days will also have employment terminated.



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Medical Leave

Full-Time employees may request an unpaid Medical Leave of Absence. Unpaid medical leave(s) of absence(s) up to 4 weeks may be granted, at management's discretion, for a non-work related illness or injury not covered by the Family Medical Leave Act.

Workplace Injuries

Employees who sustain a work-related injury will be eligible for a medical leave of absence for the period of disability in accordance with all applicable laws covering occupational disability.

Family Medical Leave Act (FMLA)

Under the Family Medical Leave Act (FMLA) eligible employees will be granted up to 12 unpaid work weeks of unpaid leave during any 12- month period for one or more of the following reasons:

- The birth and care of the newborn child of the employee
- For placement with the employee of a son or daughter for adoption or foster care
- To care for an immediate family member (spouse, child or parent) with a serious health condition
- To take medical leave when the employee is unable to work because of a serious health condition

Leave Request Process

To obtain a medical leave you must submit, to your supervisor, a letter from your attending physician as soon as you learn that you are, or will become, temporarily unable to work due to a medical condition. The letter must contain the following information:

1. The date request for the leave to begin
2. The estimated date of your return to work
3. The reason of your leave

If, due to an emergency situation, the employee is unable to submit the physician's statement to their supervisor at the time of the request, the statement must be submitted as soon as possible.

Once a request for leave is received, Coach USA will provide you with all required formal forms that must be completed for the specific type of leave.

Coach USA reserves the right to verify the validity of the physician's statement and may require periodic verification of the employees' continuing inability to work.



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Employees may submit a request to extend the leave of absence beyond the maximum, if accompanied by a physician's statement verifying why an extension is mandatory. All considerations for extensions are at the discretion of management and Coach USA's operational needs.

A physician's release will be required prior to your return to work from a medical leave of absence. Coach USA reserves the right to require that you be examined by a Coach USA designated doctor at any time to request a leave, continue an existing leave, to extend a leave of absence and to return to work. Even if an employee is released by their attending physician, Coach USA reserves the right to have the employee examined and released by a Coach USA designated doctor.

As defined by law, employees will be returned to their former position or will be offered a comparable position for which they are qualified.

Bereavement Policy

If an employee wishes to take time off due to the death of an immediate family member, the employee should notify his or her supervisor immediately. The Company defines "immediate family" as the employee's spouse, parent, child, sibling; the employee's spouse's parent, child, or sibling; the employee's child's spouse; grandparents or grandchildren.

Unpaid time off may be granted to allow the employee to attend the funeral and make any necessary arrangements associated with the death.

Up to three days of unpaid bereavement leave may be provided to eligible employees in the following classification(s):

- Regular full-time employees
- Probationary employees

Approval of bereavement leave will occur in the absence of unusual operating requirements. Any employee may, with the supervisor's approval, use any available paid leave for additional time off as necessary.

Jury Duty Leave Policy

Full- and part-time employees will be excused from work when called for jury duty. When an employee has been called for jury duty, the employee's supervisor should be given as much notice as possible. An employee must provide certification from the Court showing the days and hours served.



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The employee is expected to report for work whenever the court schedule permits. If desired, employees may use any available paid time off, (for example, vacation benefits). Accrual for benefits calculations, such as vacation, will not be affected during unpaid jury duty leave.

Time Off to Vote

Coach USA wants to make sure you have the opportunity to vote in national, state and local elections. If your working hours make it impossible for you to get to the polls before or after work, please talk to your manager. It may be possible to arrange for you to come in late or leave early without loss of pay in order to get to the polls.

Safe Environment

Introduction

Coach USA strives to maintain a safe environment for our employees, our customers and any member of the general public interacting with one of our employees or vehicles. In order to maintain this safe environment, it is necessary for Coach USA to establish policies and procedures that help enforce Coach USA's belief that all employees, customers and the general public have a rightful expectation of professionalism, courtesy and safety from all Coach USA personnel.

The following Company Policies and Procedures are meant to give employees guidance in company rules and regulations pertaining to every day assignments and operations. Coach USA reserves the right to modify, change or delete certain policies and procedures in order to comply with local, state or federal rules and regulations. Coach USA also reserves the right to amend current policies and procedures, add to the policies and procedures or delete policies and procedures as business, local, state or federal rules and regulations require.

Coach USA policies and procedures are based upon contract obligations with our customers, local, state and federal guidelines and Coach USA policies in regard to our equipment, equipment usage and rights to regulate certain actions on, in and around Coach USA property and equipment.

Please read the policies and procedures and become familiar with the contents. Should any questions arise regarding the full understanding of any policy or procedure, please contact your immediate supervisor, Human Resources, General Manager or Safety Manager for clarification.

Controlled Substance Use & Alcohol Misuse Policy

Coach USA is committed to maintaining a drug-free workplace to promote both the quality of its services and the safety of its employees, its customers and the public. Every Coach USA employee is subject to the rules issued in this Controlled Substance Use & Alcohol Misuse Policy and shall follow the Policy as defined. Every Coach USA employee:



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1. Is prohibited from using, possessing, selling, purchasing, manufacturing, distributing, or transferring alcoholic beverages and / or controlled substances and / or other performance impairing substances while on duty and / or on Coach USA property
2. Is prohibited from being on Coach USA property and / or reporting to work or performing work with a measurable amount of alcohol and/or controlled substance and / or performance impairing substance in his / her system
3. Is prohibited from the consumption of alcohol within four hours of the employee's scheduled time to report for work, or within eight hours following an accident or until the employee takes a post accident alcohol test, whichever occurs first
4. Is required to submit to an alcohol and / or drug test when directed by Coach USA
5. Is prohibited from tampering (adulteration and/or substitution) or attempting to tamper with any alcohol and / or drug test and/or interfering with the testing / collection process
6. Is required to notify his / her supervisor within five calendar days of any conviction for a drug related crime
7. Is responsible for informing his / her physician when being prescribed medication(s) that he / she is covered under the terms of this Policy. The employee shall use medically authorized drugs and / or over-the-counter medications in a manner which will not impair job performance
Shall promptly report to his / her supervisor whenever he/she is prescribed and / or uses an over-the-counter medication that might cause job performance impairment

Searches of employees and their personal effects, desks, work areas, lockers and vehicles (while on Coach USA property) may be conducted at such times and places as necessary to determine compliance with this Policy.

Violation of this Policy shall result in disciplinary action, up to and including termination, even for a first offense.

This testing program will be conducted in accordance with the standards of the U.S. Department of Transportation (DOT), 49 CFR Part 40, PROCEDURES FOR TRANSPORTATION WORKPLACE DRUG AND ALCOHOL TESTING PROGRAMS except when those standards are in conflict with this Policy or when not applicable to a non-DOT testing program (example: custody and control form used for specimen collection). 49 CFR Part 40 procedures, which will be applied to this testing program, include, but are not limited to, use of a specimen collection / alcohol testing



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site with trained personnel, split specimen collection, use of a laboratory certified by the Department of Health and Human Services (DHHS or HHS) and use of a Medical Review Officer (MRO) to investigate laboratory positives.

Coach USA has adopted this policy regarding controlled substance use and alcohol misuse. Each Coach USA employee shall read the

Policy and must sign the EMPLOYEE ACKNOWLEDGEMENT RECEIPT and agree to comply with the terms of the Controlled

Substance Use & Alcohol Misuse Policy as a condition of continued employment.

I. POLICY STATEMENT

Because of our concern for the safety of our employees, our property, the public and our concern about the productivity of our workforce, Coach USA has adopted a Controlled Substance Use & Alcohol Misuse Policy that is applicable to all employees. Our purpose in adopting this Policy is to further Coach USA's objective of establishing and maintaining a work environment free from the adverse effects of drug use and alcohol misuse.

II. PROHIBITED CONDUCT

Coach USA strictly prohibits reporting to or being at work with a measurable amount of illegal drugs and / or alcohol in the body. The manufacture, distribution, dispensing, possession, sale, purchase and / or use of drug paraphernalia and / or a prohibited controlled substance and / or alcohol while on Coach USA property or Coach USA business is a violation of this Policy. Further, the unauthorized use or possession of prescription drugs or over-the-counter drugs while on Coach USA property or Coach USA business is a violation of the Policy. The use of any substance which causes or tends to contribute to unacceptable work performance is also prohibited.

The use of alcohol at Coach USA approved functions (business meals, employee gatherings, celebration events, cocktail hours at conferences, etc.) is acceptable if (1) The activity and / or an employee's involvement in an activity is pre-approved by Coach USA management and (2) Such consumption is done in moderation so as to protect the safety of the employee, fellow employees, clients and the public in general.

A. Illegal Drugs

The presence of a detectable amount (see table below) of an illegal drug(s) in an employee while performing Coach USA business or while in a Coach USA facility and / or on Coach USA property is prohibited. Any employee who has a lab confirmed "positive" test for any of the foregoing



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drugs is in violation of this Policy, unless the employee demonstrates to the MRO a medical explanation for the presence of the drug(s) (in which case the MRO will rule the test result as “negative”).

Coach USA will test for nine controlled substances at the following levels:

Drug Initial Confirmation

Amphetamines	300 ng/ML	300 ng/ML
Barbiturates	300 "	100 "
Benzodiazepines	300 "	100 "
Cannabinoids (Marijuana)	20 "	10 "
Cocaine	300 "	150 "
Methadone	300 "	100 "
Opiates (Heroin, etc.)	2000 "	
Morphine	2000 "	
Codiene	2000 "	
Phencyclidine (PCP)	25 "	25 "

Coach USA reserves the right to alter the testing panel and threshold levels as substance usage and availability patterns suggest the need for change.

All specimens will also undergo validity testing. Validity testing is the evaluation of the specimen to determine if it is consistent with normal human urine. The purpose of validity testing is to determine whether certain adulterants or foreign substances were added to the urine, if the urine was diluted or if the specimen was substituted.

B. Alcohol

Employees will be tested for alcohol with an alcohol testing device listed on the National Highway Traffic Safety Administration’s Conforming Products List. An alcohol concentration of 0.02 or greater will be considered a “positive” and is a violation of this Policy.



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III. DISCIPLINARY ACTION

Violation of this Policy shall result in termination, even for a first offense violation.

IV. SEARCHES

Coach USA may conduct unannounced searches for illegal drugs, and / or drug paraphernalia and / or alcohol in Coach USA facilities and / or on Coach USA property. Entering Coach USA property constitutes consent to searches. Employees are expected to cooperate in the conducting of such searches.

Searches of employees and their personal property which includes, but is not limited to, lunch containers, brief cases, desks, work areas, lockers and vehicles (while on Coach USA property) may be conducted when there is reasonable suspicion to believe that an employee is in violation of this Policy and / or when circumstances and / or workplace conditions justify them.

An employee's consent to a search is required as a condition of continued employment and the employee's refusal to consent shall result in immediate termination.

No employee will be touched as part of the search or detained without his / her consent. Employees being searched may be asked to empty pockets and remove hats and outer clothing including jackets, coveralls or slickers.

Drugs discovered on Coach USA property will be turned over to the appropriate law enforcement agency. Any action taken by law enforcement agencies will be completely independent of this Policy.

V. TESTING

A. General

1. Drug and alcohol testing will be performed by an independent drug / alcohol testing service. Employees will comply with all procedures and protocols established by the independent testing service. An employee's failure to submit to a drug and / or alcohol test or to comply with all procedures and protocols established by the independent testing service is a violation of this Policy and may result in discipline, up to and including termination.

2. A Medical Review Officer (MRO) will review the results of the drug testing process. The primary responsibility of the MRO is to review and interpret lab positive drug test results. It is important to remember that a positive laboratory test result does not automatically identify an employee / applicant as a user of prohibited drugs. The MRO must review lab positive drug test



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results and determine whether any legitimate alternative medical explanation could account for the positive result.

3. When an employee is notified to go to the collection site for a specimen collection and / or alcohol test, they will be allotted 30 minutes plus reasonable travel time to report in at the collection / testing site.

B. Drug and Alcohol Testing will be conducted in the Following Situations

1. Post-Offer of Employment

All applicants who have received a conditional offer of employment will be required to submit to drug testing only (no pre-employment alcohol test will be conducted). Coach USA will withdraw the conditional offer of employment to any applicant who tests "positive" for the presence of a substance prohibited under this Policy.

2. Random (where permitted by state law)

Random testing will be applicable to all employees of Coach USA. A method of random selection will be administered by the independent testing service to ensure that an employee is selected by chance. All employees will be in the random selection pool every time a drawing is made. No employee will be excluded merely because he or she has previously been randomly selected and tested. Random testing will be conducted at an annual rate of at least 50 percent for both drugs and alcohol. Coach USA reserves the right to alter the random testing rate.

3. Post-Accident Testing Policy

The following table notes when a post-accident test is required to be conducted. These guidelines are consistent with Federal Motor Carrier Safety Administration Rules and Regulations Part 382.

TABLE FOR 382.303 (A) and (B) POST – ACCIDENT DRUG TESTING

Type of accident involved Citation issued to the CMV driver Test must
be performed by employer

ii. Bodily injury with immediate medical treatment away from the scene

iii. Damage to any motor vehicle requiring tow away

As a policy, Coach USA will follow the above guidelines in determination of post-accident testing. Accidents or incidents not meeting the above guidelines for testing will be noted as



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such in the accident report by the answer "NO" in the DOT Recordable? Column of the accident report but the driver may be required to report for post- accident drug and alcohol testing.

This Policy does not supersede the Policy requirements of our customers involving the property of the customer or employees of the customer. Should a customer require post-accident testing for ALL accidents, the testing must be performed in every case. Consistency in the implementation of this policy is of the utmost importance.

PLEASE CONTACT THE SAFETY DIRECTOR WITH ANY QUESTIONS.

4. Reasonable Suspicion

An employee may be tested for drugs and / or alcohol when supervisors have reason to believe that the employee may be in violation of this Policy. A decision to test will be generally based on two supervisors' evaluation of contemporaneous physical, behavioral or performance factors which may cause the supervisors, in the exercise of their discretion, to suspect possible drug use and / or alcohol misuse. For instance, repeated errors on the job, rule violations or unsatisfactory time and attendance patterns, or a specific contemporaneous event that indicates possible drug use and / or alcohol misuse, could provide a basis to test an employee. Alcohol testing may be conducted based solely on breath or body odor detected by one supervisor.

In all cases of reasonable suspicion testing, Coach USA shall provide transportation to and from the collection / testing site as well as to the employee's place of residence or other mutually agreeable location should the testing outcome be positive or unknown.

In the event that the results are unknown in a reasonable suspicion testing situation, the employee will be temporarily suspended from duty with pay until the results are known.

5. Wall to Wall

Employees are subject to unannounced en masse drug and / or alcohol testing. Such tests will be scheduled at the sole discretion of Coach USA. Coach USA discretion includes the determination of the scope for such testing (group of employees, department(s), facilities, etc.) in addition to the timing of such testing. Such testing shall include all employees of the named group. Additionally, such group of employees may include, but is not limited to, all employees on a job site at the time of testing or employees by shift and / or craft.

6. Testing of the Split Specimen

An employee or applicant whose drug test was reported as positive by the MRO may request a test of the split specimen, if the employee submits a written request to the MRO within seventy



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two (72) after being made aware of the test results. The employee or applicant must pay for the cost of the split test. If the results of the split test are "negative," Coach USA will reimburse the individual. The split test may be conducted at the same DHHS laboratory where the specimen was initially tested or at another DHHS certified laboratory. Selection of the laboratory will be determined by the MRO with input from the employee.

VI. EMPLOYEE ADMISSION OF CONTROLLED SUBSTANCE USE and / or ALCOHOL MISUSE

A. Employees who admit to controlled substances use and / or alcohol misuse are subject to the referral, evaluation and treatment requirements of this Policy, that is; evaluation by a Substance Abuse Professional, required treatment, follow-up testing, etc.

B. An employee is not permitted to self-identify in order to avoid testing under the requirements of this Policy.

C. An employee must make an admission of alcohol misuse or controlled substances use prior to reporting for duty.

D. The employee will not be permitted to return to work until Coach USA is satisfied that the employee has been evaluated and has successfully completed education and/or treatment requirements as directed by a Substance Abuse Professional.

E. Prior to the employee returning to work, the employee shall undergo a return-to-duty test with a result indicating an alcohol concentration of less than 0.02; and / or a return-to-duty controlled substance test with a verified negative test result for controlled substances.

VII. COST The cost of all testing, except the testing of the split specimen (see Section V. 6.), will be paid for by Coach USA. All cost associated with a SAP evaluation and required rehabilitation are the responsibility of the employee.

VIII. CONFIDENTIALITY

Coach USA will carry out this Controlled Substance Use & Alcohol Misuse Policy in a manner which respects the dignity and confidentiality of those involved.

Cell Phone Policy

The following guidelines must be followed by all employees to avoid safety issues or violating any state law regarding the use of cell phone or hands-free devices:



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- Drivers are to use cell phones only when the vehicle is stopped in a safe area off of the roadway except in extreme emergency situations
- In the event of an incoming call, the driver is to let the phone ring until it connects voicemail. If the cell phone is not equipped with voicemail, the driver is to let the phone ring until a safe exit from the roadway can be found. The missed call can then be returned
- Hands-free devices will not usurp this policy as they have been shown to be as much of a distraction as cell phones

Adherence to this Policy and guidelines is required by all Coach USA employees operating company-owned, leased or rented vehicles. Any questions regarding this Policy should be addressed to your immediate supervisor.

No Smoking Policy

Coach USA recognizes that some individuals will smoke regardless of possible consequences to their health and the health of others. However, Coach USA reserves and enforces the right of the Company to limit when and where an employee can smoke while on duty or when operating company equipment.

All employees are to use designated smoking locations when on Coach USA property. Smoking is not allowed inside Coach USA facilities or in Coach USA equipment. Employees are not allowed to smoke in the presence of customers or when operating Coach USA equipment. Employees must also obey the smoking policies of customers and other facilities or properties.

Speed Policy

Operators of company-owned, leased or rented vehicles are required to obey the speed limits set forth by the authorities in any state in which they operate. Citations for speeding are considered serious violations of company policy and may result in disciplinary action up to and including termination. Speed is a direct factor in fuel economy, wear and tear on the vehicle and public perception of our organization.

Oversight

The Company may use any and all of the following methods for determining and controlling the speed at which company vehicles are operated: Log miles and driving hours, GPS systems, toll receipts (time and distance between tolls), vehicle on-board computers, Drive Cam and visual observations (such as pacing).

Shut Down Policy

Inclement weather presents a definite problem for equipment and drivers. Drivers must be aware of inclement weather driving techniques and implement those techniques when



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operating in rain, fog, high wind, snow, ice, etc. At times, a driver may deem weather conditions to be so extreme as to present a hazard to the driver, customer or company equipment. When a driver believes that weather conditions require a shut down of company equipment, the following procedures must be followed:

- The driver must contact the local manager to inform them of the current road or weather conditions
- After the driver and local manager have agreed that conditions warrant a shut down, the local manager must immediately contact customer personnel and inform them of the shut down and supply a possible time frame for equipment to resume the assignment
- The local manager will then notify company dispatch of the location of the shut down, the conditions which necessitated the shut down and the time frame for possible resumption of the assignment
- The driver must find a safe place to park the vehicle where it can be secured and does not represent a hazard to other vehicles or persons
- When conditions improve to the point that the assignment can be resumed, the local manager will notify customer personnel and company dispatch. Driving in weather that is extreme is not a legitimate excuse for involvement in an accident with other vehicles, fixed objects or pedestrians. Inclement weather is not an excuse for damaging company equipment. The driver, local manager and dispatch each hold responsibility for implementing shut down procedures.

Driver Performance Policy

A continuous review of driver safety records (MVR) is performed to identify driving infractions, safety incidents and collisions is the basis for determining affected employees. Coach USA reserves the right to obtain an MVR on any employee who operates a Coach USA vehicle based on events such as citations, customer complaints of excessive speed, changes in MVR restrictions and notification by the employee to Coach USA that an incident, citation or change has occurred.

Any employee involved in a chargeable event will be subject to evaluation by the Safety Manager and / or the Operations Manager. The evaluation will determine if the employee needs additional or remedial training. Objective fact is the basis for the evaluation determination. The facts may include, but are not limited to, admissions on the part of the employee, observations by managers or supervisors and investigative findings.

Based upon the severity of the accident / incident, the employee may be placed out of service until additional or remedial training can be provided.



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In the event that the employee does not respond to the application of this policy, disciplinary measures up to and including termination should be applied.

Fueling Policy

Procedures

Each Coach USA driver is issued a fuel card and Personal Identification Number (PIN). The fuel card procedures are as follows:

- Fuel cards are to be kept in the vehicle on the driver side visor. Cards are to remain with the vehicle at all times
- PIN numbers may be located in your wallet but may not be located on the card, the card jacket or kept anywhere within the vehicle.
- Fueling requires that the EXACT odometer mileage be entered along with the van number (if applicable)
- Transfer of cards from one vehicle to another is against company policy and can result in termination
- Safeguarding of the card and PIN are the sole responsibility of the driver
- Misuse of the fuel card or fraudulent purchases will result in disciplinary action up to and including termination. All fraudulent charges will be deducted from the final check that the driver is scheduled to receive. In some cases, prosecution can and will be implemented for fraudulent use of the card

Seat Belt Policy

Coach USA requires the use of seat belts for operators of company-owned, leased or rented equipment. Passengers are also required to wear seat belts when on board a company-owned, leased or rented vehicle. In most, if not all states, seat belt use is mandatory for both operators and passengers. However, since Coach USA requires the use of seat belts, our requirement would be more stringent than any state law would mandate. The use of seat belts for our operators and our passengers is not a matter of choice. Use of seat belts is required by company policy.

Maintenance of Occupant Restraint Devices

Coach USA requires that a Daily Vehicle Inspection Report (DVIR) is filled out and turned in by each operator of every company-owned, leased or rented vehicle. The DVIR addresses the functionality of occupant restraint devices. Any company-owned, leased or rented vehicle must



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have functional occupant restraint devices for every available seating space. Defective occupant restraint devices must be reported to maintenance and the vehicle may not be put into service until defective occupant restraint devices are repaired and in good working order.

Failure to Obey Policy

Failure to implement the company policy regarding seat belt use is a serious violation. Disciplinary measures for failure to follow this policy can result in verbal warning, written warning or termination.

Log Book Policy

Every driver employee for Coach USA is required to keep an up-to-date log book. Logs are required to be filled out each day including off duty days when no assignments are performed. Logs should be turned in each day when possible but no later than seven 7 days after completion of the log. Employees failing to turn in correct logs will be asked to correct errors on the log. Employees failing to turn in logs within the seven 7-day period will be placed out-of-service until the logs are submitted.

§395.5 - Maximum driving time for passenger-carrying vehicles. Subject to the exceptions and exemptions in §395.1:

(a) No motor carrier shall permit or require any driver used by it to drive a passenger-carrying commercial motor vehicle, nor shall any such driver drive a passenger-carrying commercial motor vehicle:

(a)(1) More than 10 hours following 8 consecutive hours off duty; or (a)(2) For any period after having been on duty 15 hours following 8 consecutive hours off duty.

(b) No motor carrier shall permit or require a driver of a passenger-carrying commercial motor vehicle to drive, nor shall any driver drive a passenger-carrying commercial motor vehicle, regardless of the number of motor carriers using the driver's services, for any period after-

(b)(1) Having been on duty 60 hours in any 7 consecutive days if the employing motor carrier does not operate commercial motor vehicles every day of the week; or

(b)(2) Having been on duty 70 hours in any period of 8 consecutive days if the employing motor carrier operates commercial motor vehicles every day of the week.

Administration(FMCSA) Rules and Regulations regarding commercial vehicle and railroad crossing regulations, FMCSR Part



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392.10 when those regulations are applicable.

Guidelines

Any deviation from the guidelines below can endanger our employees, customers and the general public. Failure to adhere to the guidelines set forth in this railroad crossing policy is considered a serious safety violation and will result in disciplinary action up to and including termination.

8–Passenger and 9–15 Passenger Vans No stop is required if

- a) a functioning highway traffic signal transmits a green indicator which, under local law, permits the vehicle to proceed across the tracks at a safe speed without stopping
- b) a police officer or crossing flagman directs traffic to proceed
- c) the crossing is abandoned and marked with a sign indicating such
- d) an “exempt” sign is erected at the crossing by state or local authorities
- e) the crossing is a streetcar crossing or tracks used exclusively for industrial switching purposes
- f) active crossings are equipped with flashing lights and / or gates so long as the lights are not flashing and the gate arms are in the open position

Complete stops required if

1. the crossing is controlled by cross bucks
2. the crossing is located within a rail yard
3. the crossing is not controlled by (a) (b) (c) (d) (e) or (f) listed above

9–15 Passenger Vans (Commercial Motor Vehicle designation) Regulations

FMCSA Rules and Regulations, Part 392.10: The driver of a commercial motor vehicle shall not cross a railroad track or tracks at grade unless he / she first: Stops the commercial motor vehicle within 50 feet of, and not closer than 15 feet to the tracks; thereafter listens and looks in each direction along the tracks for an approaching train; and ascertains that no train is approaching. When it is safe to do so, the driver may drive the commercial motor vehicle



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across the tracks. Coach USA drivers will engage the 4-way flashers at any railroad grade crossing requiring a complete stop prior to making the stop.

Unauthorized Use of Coach USA Equipment – Use of Personal Equipment for Coach USA Business

Personal Use of Company Equipment

It is expressly forbidden to use company equipment for personal use. Only with the express, written consent of the General Manager can a company vehicle be used for personal business. In most cases, the cause would be extreme. Operators involved in collisions with other motor vehicles, pedestrians or fixed objects when not on an assignment are subject to immediate termination and rightful remediation of costs to repair the Company vehicle, other vehicles, and injuries to pedestrians, unauthorized passengers or damages to fixed objects. Unauthorized use can best be described as “any usage of a company vehicle not going to, coming from or on an assignment.” Repairs, oil changes, washes and fueling while not on assignment must be approved by the local Service Manager or Operations Manager.

Use of Personal Vehicle for Company Business

In some cases, drivers may be allowed to use personal vehicles for company business. In order to use a personal vehicle for company-related activity, the driver must provide proof of insurance coverage and financial responsibility on the vehicle. Proof of financial responsibility (insurance) must be a certificate of insurance from the carrier, underwriter or agent. An insurance card is not sufficient proof of insurance. The certificate must be on file before the request to use a personal vehicle is made.

Fuel Costs and Routing

The rising costs associated with fuel usage greatly increase company expenditures. When given an assignment, drivers should use the most expeditious route available, avoiding detours or “shortcuts” that may actually use more fuel. Should any collision occur while a vehicle is “out-of-route”, the driver will be asked to explain the reason for being off-route while on assignment.

Citations (Company and Personal Vehicle)

Any citation received while operating either a company vehicle or personal vehicle must be reported immediately to the employee’s direct supervisor.



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Management Reporting for Major Accidents

To ensure that senior management of Coach USA is properly informed of major and / or catastrophic incidents involving Coach USA vehicles, employees or facilities, the process and reporting chain outlined below must be followed.

This process and reporting chain allows senior management to respond appropriately to any media inquiries and verify that all proper steps are taken and all necessary company resources are implemented to respond and manage the incident correctly.

Major Incidents

A major incident would include any incident listed below that occurs on company vehicles, facilities or as a result of the action of a company vehicle:

- Fatality of an employee, customer or by-stander
- An employee, customer or by-stander transported by ambulance
- A vehicle leaving the roadway or rolling over
- A vehicle so damaged that it is not capable of continuing under its own power
- An incident in which multiple persons are transported to a hospital
- An incident involving an employee possibly under the influence of alcohol, drugs or any other controlled or illegal substance
- An incident resulting from suspected terrorist activity

Reporting Chain of Command

When a dispatcher or other personnel are notified of a major incident as defined above, in addition to requesting an on-site claims investigator from our claims management companies, the following steps must be taken:

- Dispatch contacts the local Operations or Safety Manager
- The Operations or Safety Manager contacts the General Manager
- If the General Manager is unavailable, the Regional Safety Director will be contacted
- The General Manager or the Regional Safety Director will notify the Regional Vice President as well as the Regional Safety Director if the General Manager is making the contact
- The Regional Safety Director and / or the Regional Vice President will notify the Corporate Safety Director who will inform senior management



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ACKNOWLEDGMENT OF RECEIPT AND REVIEW OF EMPLOYEE HANDBOOK

I Hereby Acknowledge Receipt Of The Employee Handbook, Which Supersedes And Replaces All Prior Published Or Unpublished Policies. I Understand That The Purpose Of This Handbook Is To Provide Employees Of The Company With General Information Regarding Policies And Procedures The Company Attempts To Follow In Most Cases But That Neither This Handbook Nor Any Provision Of This Handbook Is An Employment Contract Or Any Other Type Of Contract. I Also Understand That Because Of The Nature Of The Company's Operations And Variations Necessary To Accommodate Individual Situations, The Policies And Procedures Set Out In This Handbook May Not Apply To Every Employee Or Me. Similarly, I Understand And Agree That The Company May Change Or Modify These Or Other Policies Or Procedures Relating To Employment Matters From Time To Time As It Considers Necessary In Its Sole Discretion Without Notice To Me. I Understand And Agree That These Policies And Procedures Are To Be Interpreted And Applied By The Company In Its Sole Discretion, Whose Decisions In This Regard Will Be Final. I Understand That, Under No Circumstances, Are The Policies And Procedures Set Out In This Employee Handbook Or In Other Communications To Employees Promises By The Company That My Employment Will Always Be Governed By Them.

I Understand And Agree That My Employment Is For An Indefinite Term And Is Terminable At Any Time At The Will Of Either Myself Or The Company For Any Reason. I Understand That Severance Of This Employment Relationship At Any Time, By Either Party, For Any Reason Not Prohibited By Law Will Not Constitute A Violation Of Any Express Or Implied Covenant. I Also Understand That This Status Can Only Be Altered By A Written Contract Of Employment Which Is Specific As To All Material Terms And Is Signed By Myself And The President Of The Respective Company.

ACKNOWLEDGMENT OF RECEIPT AND REVIEW OF EMPLOYEE HANDBOOK

I Have Read And Understand The Above Statement And Agree To Read The Employee Handbook.

EMPLOYEE SIGNATURE

DATE

I acknowledge that I have received a copy of Coach USA's Prohibited Harassment, Discrimination and Retaliation Policy. I agree to read it thoroughly, and agree that if there is any policy or provision in the Policy I do not understand, I will seek clarification from the Human Resources Department.