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To: Access Board  
Date: January 19, 2009  
Re: Docket number 2007-1 or RIN number 3014-AA38

Upon review of the second draft of the updated vehicle guidelines for buses and vans, Goshen Coach, Inc. would like to submit the following observations/suggestions/recommendations.

In general, the specification revisions appear to be more oriented around and/or toward a "larger" vehicle market segment (forty (40) foot buses). Goshen Coach, Inc. is a manufacturer and active participant in the Medium Duty Bus Industry. Consequently, our manufacturing process is mostly limited to a few choices of chassis that create "parameters" on which we manufacture the vehicles, therefore directly impact the ability to meet the revised specifications as stated.

Specifically, T502.2 Clear Width for circulation paths and doorways: Unlike possibly the "large" vehicle market, the vehicle size and width in the Medium Duty Bus Industry prohibits the manufacturer from providing what would be considered an acceptable and functional floor plan. In several instances, popular floor plans would become extinct. A few implications of building the vehicles in the proposed specification as stated would be the following:

1. Reduced number of both ambulatory passengers and wheelchair occupants
2. Increased number of vehicles in operation (because of item # 1)
3. Increased emissions and carbon footprint (because of item # 2)
4. Increased cost of vehicle due to body and floor plan modifications

T402.4.1 & T402.4.2 Front, Side, or Rear Approach: Similarly as T502.2, the Medium Duty Bus Industry manufacturer is limited in space due to the size of the vehicles. The same implications apply:

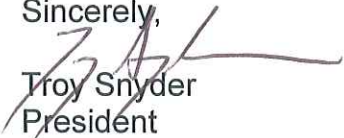
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T303.8.1 General Slope: Once again, the orientation appears to be directed at a market segment other than the Medium Duty Bus Industry. In this case, the specifications would reduce the number of vehicles available to the transit market simply because the Medium Duty Bus Industry offers low floor accessible vehicles that are purpose built due to chassis limitations and most likely would not be able to comply.

T302.2 Design Load: This appears to conflict with FMVSS 403. The design load for testing purposes in ADA specifies 660 lbs. The design load for FMVSS 403 states 600 lbs. This will cause conflicting test results for all required FMVSS 403 testing. We feel that these design load specifications should coincide.

Goshen Coach, Inc. would like to suggest that variances and/or recognition of the class of vehicle be applicable for the Medium Duty Bus Industry. As stated previously, we provide purpose built buses that are limited to a few choices of chassis. Interior space within the vehicle becomes extremely valuable. The specifications, as written, challenge our abilities to provide transportation solutions that are feasible, economical, and environmentally friendly. We believe the results would lead to an increase in the number of vehicles in operation, increased emissions, increased cost, and in some instances a reduction in the number of low floor accessible vehicles available. In a time when the economy is suffering and the focus on reducing emissions is enormous, we believe that it necessary to review and revise the specifications based on all the market segments and industry requirements.

Sincerely,



Troy Snyder  
President