



March 25, 2024

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

The Honorable Livia Shmavonian
Director, Made in America Office
Office of Management and Budget
725 17th St NW
Washington, DC 20500

Dear Secretary Buttigieg and Director Shmavonian:

We are writing in strong support and timely consideration of a temporary and targeted Buy America waiver request submitted to the Federal Transit Administration (FTA). Sixteen transit systems from five states have submitted non-availability and public interest waiver requests for an all-electric minibus, the e-JEST. It's critical that these requests receive timely consideration to ensure these transit systems and others across the country can continue to provide timely, reliable, and quality service in the face of a growing crisis in the small bus marketplace. It's been six months since the initial waiver submission and these systems, along with hundreds of others, are in desperate need of new buses.

The cutaway marketplace is experiencing significant challenges, including long delivery times and significant cost increases. Making matters worse, El Dorado National-California (ENC) recently announced it will be exiting the cutaway market by winding down its manufacturing by the end of the year. The consolidation in the small bus marketplace is going to have serious and profound consequences on daily operations which invariably will lead to service disruptions and increasing safety issues.

The e-JEST is a purpose-built all-electric minibus with a 12-15 year useful life and can be delivered in three to six months. Functionally, the e-JEST is a good fit for the transit trend line of increasing zero emission vehicles in rural areas, on-demand and paratransit operations.

Providing a temporary waiver for a bus like the e-JEST will incentivize future domestic manufacturing in the United States and create hundreds of American jobs. If granted a temporary waiver, Karsan Automotive - the manufacturer of the e-JEST - and Damera Bus - the North American dealer - have committed to meet the 70% domestic content and final assembly requirements of Buy America within two years. The e-JEST already has 30% American content and will be incorporating battery packs made by One Battery in Michigan, which will immediately increase domestic content to over 50% and invest in the U.S. battery marketplace.

Thus, we feel it is appropriate and within the spirit of Buy America to provide a temporary waiver to incentivize domestic manufacturing, production, and use of these needed vehicles to American transit systems. Incorporating these vehicles into U.S. fleets will allow our transit systems to meet important climate objectives, improve competition, alleviate the strain on the supply chain and provide the service capabilities needed by our transit riding public. As such, we respectfully request a limited duration, general non-availability and public interest waiver for low entrance, 20-foot, zero-emission minibuses.

Thank you for your time and consideration.

Sincerely,

Scott Bogren,
Executive Director
Community Transportation Association of America

Corey Aldridge
CEO & General Manager
Mountain Line
Missoula, MT

Jameson Auten
Chief Executive Officer
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