



Transportation Division

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JEREMY R. FERGUSON
President

March 18, 2020

VIA EMAIL & USPS

Mr. Raymond P. Martinez
Administrator - Federal Motor Carrier Safety Administration
US Department of Transportation
1200 New Jersey Avenue S.E.
Washington, DC 20590

Dear Mr. Martinez:

The undersigned have growing concerns regarding reports from the Centers for Disease Control and Prevention (CDC) that COVID-19 disease (coronavirus) is continuing to spread rapidly in the United States. As our Organization represents nearly 8,000 bus members, many of whom are employed as operators in densely populated urban areas, we take this issue very seriously and have been closely monitoring the continuing developments.

As you are likely already aware, over the last several weeks multiple departments within the Department of Transportation (more specifically, the Federal Transit Administration, the Federal Aviation Administration, the Saint Lawrence Seaway Development Corporation, and the Maritime Administration) have issued guidelines to certain employers on how to approach this issue, along with statements and guidelines focused on educating and protecting the employees and passengers who may be impacted by this deadly disease. While it is noted FMCSA recently issued a national emergency declaration and guidelines for commercial vehicles delivering relief in response to the COVID-19 outbreak, to our knowledge, it has not released information or guidelines pertinent to our members.

In view of the above, we are urging you to issue emergency regulations directed towards metropolitan transportation authorities (and similar carriers), employees and passengers, mandating, at minimum, that:

- buses be sanitized after every route or tour of duty, prior to it being occupied by a subsequent operator or passengers. Require the use of CDC recommended chemicals to kill germs on surfaces, including wiping down all operator controls, seating, windows, steering wheels, door handles, switches, etc. (anywhere that an employee is likely to touch). Likewise, a disinfectant spray should be used at the end of cleaning to broadly disinfect the operators' work area;
- passenger areas and other equipment such as (but not limited to) computers, time clocks, restrooms, and communal areas such as offices, crew staging areas and garages be sanitized at least once every 8 hours, ideally within the range of normal shift changes and on/off duty times, if they exist;

- the above sanitization tasks be performed by individuals designated and educated on proper procedures, who are equipped with the necessary personal protective equipment, and include the removal of trash from buses and communal areas (this should not be considered incidental work performed by operators);
- operators and passengers be provided with personal protective equipment, alcohol-based hand sanitizer strong enough to kill viruses, and other cleaning supplies as deemed appropriate;
- the number of passengers and/or employees in a confined area (including buses) be limited to comply with the applicable Local, State, and/or federal guidelines;
- employees be encouraged to stay home if they have respiratory symptoms (coughing, sneezing, shortness of breath, and/or fever) and to leave work if they develop such symptoms while at the workplace;
- prohibition of attendance policies and availability standards which could result in discipline or penalties for employees who miss work due to COVID-19 related symptoms and/or illness;
- all employees (including supervisory staff) must be educated on the appropriate guidelines for self-monitoring of their health condition, as well as monitoring and addressing others who appear to be symptomatic;
- all employees reporting to work must be scanned for fever prior to the beginning of each route or tour of duty, with employees identified as having an elevated temperature immediately isolated and sent home for treatment or self-quarantine in accordance with CDC guidelines;
- carriers must report to the appropriate health departments where employees have shown aforementioned symptoms that prevent them from carrying out their assigned duties;
- carriers must develop plans for employees who reside with, and/or come into direct contact with, individuals who are symptomatic, and
- carriers must comply with other such guidelines issued by the CDC and the federal government.

Further, we ask that you provide continual updates to these guidelines and/or mandates, as other departments have done.

Please advise of your plans pertaining to this very serious situation.

We thank you in advance for your time and attention to this matter, and we look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeremy R. Ferguson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeremy R. Ferguson
President - Transportation Division

A handwritten signature in black ink, appearing to read "Calvin K. Studivant". The signature is cursive and somewhat stylized.

Calvin K. Studivant
Vice President, Bus - Transportation Division

A handwritten signature in black ink, appearing to read "Alvy Hughes". The signature is cursive and somewhat stylized.

Alvy Hughes
Vice President, Bus - Transportation Division