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November 8, 2005

**VIA FAX AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. George Person
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
400 Seventh Street, S.W.
Washington, D.C. 20590

**Re: General Coach America, Inc.
Renotification Procedures Involving Recall No. 04V-275**

Dear Mr. Person:

In response to your letter dated October 27, 2005, General Coach America, Inc. ("General Coach") has developed a renotification procedure with respect to the M1030, M1030L, M1035, and M1035L buses that were not corrected or otherwise accounted for during the initial phase of the above-referenced recall campaign.

Enclosed as Exhibit "A" is a draft copy of our proposed renotification letter to be sent to the current owners of the buses subject to this recall campaign that were not repaired under the initial phase of the recall campaign. As required by 49 CFR Part 577.10, this renotification letter is identified as being a follow-up to the initial recall notification sent back in June 2004.

Enclosed as Exhibit "B" is a draft of the language to be included on a postcard that will also be sent with the renotification letter. This postcard will allow General Coach to determine the number of buses that have already been repaired but were not reported during the initial phase of the recall campaign, as well as the number of buses that will be repaired as a result of this renotification campaign.

After the renotification of the current owners has been completed, General Coach will file three additional quarterly reports in order to notify NHTSA of the total number of additional buses repaired as a result of this renotification campaign.

In response to your letter dated October 27, 2005, I spoke with Kelly Schuler of your office regarding the guideline that General Coach obtain an updated owner list based on current state motor vehicle registration records. Based on the fact that there are a limited number of buses subject to this renotification campaign, based on the fact that General Coach retains up-to-date owner information as part of its warranty records and has high confidence in the reliability of

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such owner information, and based on the fact that General Coach has contacted all of these owners by telephone as recently as June of this year, Ms. Schuler acknowledged that requiring General Coach to search the current state motor vehicle registration records for owner information would result in General Coach unnecessarily incurring additional time and expense in an exercise that would merely result in a duplication of its existing owner information. Accordingly, General Coach will be using its current warranty information to compile its owner list. If this renotification campaign is not successful using General Coach's existing owner information, General Coach acknowledges that it may be required by NHTSA to obtain an updated owner list based on current state motor vehicle registration records in order to successfully complete the renotification campaign.

General Coach's proposed schedule for conducting the owner renotification follows:

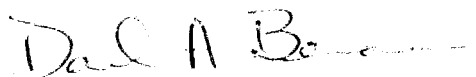
- a. General Coach has already compiled the owner list necessary to initiate the owner renotification.
- b. General Coach will be able to begin the owner renotification within two weeks of NHTSA's approval of the renotification procedures set forth in this letter.
- c. General Coach expects that the owner renotification will be completed on the same day that such owner renotifications begin.

Please review the enclosed documents to insure that they comply with the NHTSA regulations governing follow-up notifications set forth in 49 CFR Part 577.10.

Upon approval of the enclosed documents and procedures, General Coach will initiate the renotification process in accordance with the proposed schedule set forth above.

If you have any questions with respect to this matter, please feel free to contact me.

Very truly yours,



Daniel A. Bensman

dja

Enclosures

cc: General Coach America, Inc. (via fax-w/enc.)
John M. Garmhausen (w/enc.)