

Nitetrain Coach Company, Inc.
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DEPARTMENT OF
TRANSPORTATION

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DOCKET OPERATIONS

September 27, 2020

The Honorable James Owens
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
West Building, Fourth Floor
Washington, D.C. 20590

**RE: Docket No: NHTSA-2020-0075-Receipt of Petition for Temporary Exemption From
Shoulder Belt Requirement for Side-Facing Seats on Motorcoaches**

Dear Acting Administrator Owens:

Nitetrain Coach Company, Inc. submits the following comments to the National Highway Traffic Safety Administration's Notice of receipt of a petition for a temporary exemption; request for comment, Docket No. NHTSA-2020-0075, published at 85 Fed. Reg. 51550 (August 20, 2020). We strongly support granting the exemption from the shoulder belt requirement for side-facing seats on motorcoaches to the final-stage manufacturers identified in the petition.

Our company is a **final-stage manufacturer** in the entertainer coach market. Our fleet consists of over 100 units that provide custom interior entertainer coaches to the music industry. Our business provides employment to over 200 drivers, site staff, mechanics and other support individuals in the Nashville TN area. Nitetrain Coach has been in business for over 30 years and has developed a great reputation as a leader in our industry.

Entertainer coaches are a unique form of transportation specifically designed and manufactured for small groups such as music bands or political candidates. Although constructed on the same bus chassis or platform as a 55-passenger motorcoach, entertainer coaches generally are customized in two or more stages from an "incomplete vehicle" and finished to seat fewer than 16 persons, while providing the amenities more closely associated with a "motor home." Amenities in entertainer coaches typically include couch seating, galleys, tables, showers, bunk