

June 2, 2008

VIA OVERNIGHT DELIVERY

Ms. Marisol Simon, Regional Administrator
Federal Transit Administration, Region V
200 West Adams Street
Suyite 320
Chicago, Illinois 60606-5253

Re: Allerton Charter Coach, Inc., Charter Complaint No. 2007-10

Dear Administrator Simon,

On behalf of my client, Allerton Charter Coach, Inc. ("Allerton"), I write to respond to your letter of May 1, 2008 seeking responses to a number of questions you have raised concerning MetroLINK's provision of bus service to the 2007 John Deere Classic golf tournament. Allerton is pleased to provide these responses as you conduct an investigation into its complaint. In addition to the exhibits provided with its initial complaint, Allerton provides two exhibits with this response. The first exhibit shows the bus shuttle schedule for the 2008 John Deere Classic, which is virtually identical to the 2007 shuttle service. The second is another copy of the map for the 2007 tournament showing the pick up and drop off locations.

Allerton also wishes to submit the attached video (DVD) which contains clips that are responsive to most of the questions posed in your letter. The video shows endpoint-to-endpoint round-trip operation of each route serving the tournament, including the temporary stops and temporary facilities erected for use by golf tournament attendees, and puts into sharp focus the nature of this service. In addition to the video and the exhibits attached to this response, Allerton has made available an interactive Google map which shows the exact routings and precise stop locations for the tournament shuttles. To view all five golf shuttle routes, please visit www.DELGRIFFITH.com, a site owned by complainant. Allerton's responses to your specific questions follow.

- 1. With regards to bus service along the routes from the parking lots to the golf course (and back), did MetroLINK intend that this service would be available to pick up and/or drop off passengers at any of the regular fixed route intermediate bus stops pursuant to either a demand responsive request or at the request of people waiting at those intermediate stops or from riding passengers?**

Allerton has previously submitted evidence that shows MetroLINK did not intend for this service to serve intermediate stops between the parking lots and the golf course. One of the stops was located just across the street from the clubhouse and was intended to serve caddies and possibly other tournament personnel. There were no intermediate stops for that "route." Other stops were specifically designated for tournament VIPs, and it is highly unlikely any member of the general public would even attempt to board such a bus. The routes that were designated for general tournament patrons were specifically advertised for tournament patrons only. Riders were screened to prohibit persons with cell phones, cameras and coolers from entering the buses. All of these facts point to the conclusion that MetroLINK had no intention for this service to serve intermediate stops. Its sole intent was to provide a closed door shuttle between designated, paid parking lots to the golf course and back.

The shuttle schedule (EXHIBIT 1) only advertised endpoints and made no reference to regular route numbers or schedules. Furthermore, route "colors" used for golf shuttles did not coincide with the routes typically associated with those colors. For instance, the regular orange route serves the southwest corner of the MetroLINK service area, many miles from the nearest golf shuttle route. The Orange golf shuttle served the Riverbend Industrial Park/Foundry, which is in the northeast corner of the MetroLINK service area.

The Yellow golf shuttle to Quad Cities Downs ran on four lane roads with a median separating them. (See Video of Yellow Route) Those roads offered limited-access to any bus riders for most of the route because there are few intersecting streets and no way to get on or off a bus except at an interchange or stoplight. Picking up and dropping off passengers along the route was essentially impossible. Although Quad Cities Downs is served by one infrequent regular MetroLINK route from the west, there is no regular service to the south, towards the golf course.

The Pink shuttle ran from the clubhouse on one side of Colona Road to a parking lot on the other side of Colona Road. The route length from the parking lot to the front gate of the golf course was about 400 to 600 feet. There was simply no opportunity or reason to pick up or drop off people mid-route on a route which was only 10-15 bus lengths long.

Buses operating the Blue golf shuttle to the fairgrounds typically ran in the left lane of a four-lane street. (See Video of Blue Route) This would have made it impractical for them to pick up or drop off passengers along the route. The practice of running in left lane suggests that drivers were unconcerned with picking up and dropping off passengers along the route. Transit drivers typically drive in the right lane so they can pick up and drop off passengers. Traveling in the left lane is a strong indication that the shuttle drivers were not expected or allowed to pick up or drop off passengers between route endpoints.

- 2. Did MetroLINK advertise that its golf tournament service that transported people from the parking lots to gold course (and back) would pick up and drop off passengers along the parking lot-to-golf course route at the fixed route bus stops either as a demand response pick up or a normal bus stop pick-up?**

Allerton has previously provided the website page advertising the 2007 golf tournament shuttle schedule. Complaint, Exhibit 1. Exhibits 1 and 2 to this response show the advertisements for the 2008 tournament shuttle. There is no indication on these advertisements that MetroLINK would pick up and drop off passengers along the routes. In fact, the advertisements have no maps or descriptions of the routes the buses would follow between the endpoints. No one viewing these advertisements would have any idea where to board the buses along the routes because they do not know where the routes are. Anyone wanting to ride these buses would only know of the two endpoints for any route – the parking lots and the golf course. Allerton knows of no other advertisements for the event, and knows of no other advertisements showing that MetroLINK would pick up and drop off passengers along the routes.

- 3. With regards to bus service along the routes from the parking lots to the golf course (and back), did MetroLINK receive any request for and/or actually pick up and drop off any passengers at any of the regular fixed route intermediate bus stops pursuant to a demand responsive request?**

During the course of taping the videos included with this response and our client's observations, no passengers were seen boarding or exiting any bus at any location but the route endpoints.

- 4. With regards to the bus service along the routes from the parking lots to the golf course (and back), did MetroLINK pick up and drop off any passengers at any of the regular fixed route intermediate bus stops not in response to a demand response request, but merely because people were waiting at the bus stop or riding passengers requested to be let off?**

During the course of our client's observations and videotaping, no golf shuttle buses were seen making any stops at regular Metrolink bus stops.

- 5. With regards to the bus service along the routes from the parking lots to the golf course (and back), did MetroLINK intend this service to be "express" service from the parking lots to the golf course with no intermediate stops? If so, was this service advertised to the public as this type of service?**

See Exhibits 1 and 2. There is no indication that the golf shuttles were anything but expeditious service between the endpoints of the routes.

- 6. Were the MetroLINK buses specially marked in a manner that would distinguish them from the usual fixed route bus service? Did the buses display any thing that would indicate that this was bus service for the golf tournament?**

Many of the golf shuttles displayed special signage affixed to bus exterior. The signs read "The State Farm Good Neighbor SHUTTLE." Below that text, the logos of John Deere and State Farm appeared. Below is a picture from the enclosed video showing the special shuttle signage.



- 7. In providing bus service from the parking lots to the golf course (and back), did any buses travel along routes or travel to passenger pick-up or drop-off points which were not MetroLINK's regular fixed routes?**

The only stop which is regularly and legitimately served by MetroLINK seems to be Quad Cities Downs, which is regularly served by MetroLINK's Red route. However, the Yellow golf shuttle from Quad Cities Downs used many miles of Route 92 which are not served by MetroLINK routes. Specifically, MetroLINK does not operate on Route 92 between Quad Cities Downs and Colona Road.

The picture below shows the special bus stop and signage at Quad Cities Downs for Yellow golf shuttle.

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The Orange golf shuttle to the Riverbend Industrial Park/Foundry stop was about four blocks from the nearest MetroLINK Route. This route included segments of Route 5 and other streets which are not normally used by MetroLINK.

The picture below shows the special bus stop and signage at Riverbend Industrial Park/Foundry for Orange golf shuttle.



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The Blue golf shuttle to the Fairgrounds back parking lot is hundreds of feet from the nearest MetroLINK route. MetroLINK does not typically travel along the pavement used in the operation of this route, which included running on some back streets, through a parking lot, and on a frontage road.

The picture below shows the special bus stop and signage at Fairgrounds for the Blue golf shuttle.



The Green golf shuttle to the back parking lot of Moline High School is hundreds of feet (with only a circuitous route if you want to stay on a sidewalk) from the regular MetroLINK stop in front of the school. Several miles of this route were on John Deere Road in an area not served by MetroLINK. Also, MetroLINK does not normally use the streets to the south and west of the high school, as they did in operating this shuttle.

The picture below shows the special bus stop and portable toilets at Moline High School south lot for the Green golf shuttle.



With regard to the Pink golf shuttle, although MetroLINK serves Colona Road, they do not serve the dead-end frontage road on which the Caddy/VIP parking lot was located. The relevant regular route runs perpendicular to the Pink golf shuttle. The distance between the average Metrolink user's residence and the closest Metrolink stop is likely greater than the length of the entire pink route. This route is only about 10-15 (40') bus lengths long.

The picture below shows the special bus stop at Caddy Lot for the Pink golf shuttle.



- 8. The service announcement, Exhibit FTA 3, indicates different categories of parking patrons. Were public parking patrons who were not considered golf tournament VIPs or volunteers dropped off at one location, but VIP parkers were taken to another location? Were either of either of these locations a regular fixed route bus stop? If these stops were not regular fixed route stops, was the public notified of the new stops as new service? Were either of these locations marked as a bus stop?**

Allerton's exhibits show there were different pick up/drop off parking locations for volunteers and VIP's and regular golf tournament patrons. Additionally, the video shows that VIP's were dropped off at clubhouse, inside the main gate of the golf course. Regular patrons were dropped off at a stop outside the gate. Private automobiles were not permitted inside the main gate without special credentials. As Allerton has noted, none of the advertisements indicates that these were anything other than shuttle bus pick up and drop off points, and were not new public transportation service.

- 9. Were the parking lots that were served by MetroLINK's bus service to the golf course bus stops along MetroLINK's regular fixed routes?**

Riverbend Industrial Park/Foundry: NO

Moline High School - south parking lot: NO

Fairgrounds - south/west side of parking lot: NO

Caddy Parking Lot: NO

Quad City Downs: YES

10. Was there a golf tournament-specific bus service route notice provided to the public other than Exhibit FTA 3? Please provide copies and when and how these notices, including Exhibit FTA 3, were provided to the public.

Allerton is aware of no other advertisements except those previously provided.

11. Who and how was it determined how much, where and who would collect the bus fares? Who and how was it determined where the parking lots were to be? Who and how was it determined how fares collected would be remitted to MetroLINK? Who and how was it determined that there would be different locations and services for VIPs and volunteers? Were VIPs and volunteers charged for bus transportation?

While observing the shuttle service during the tournament, our client saw no evidence that drivers collected any fares. Moreover, the rate of boarding was sufficiently fast that fare collection could not have been undertaken at the bus.

12. Did anyone affiliated with the golf tournament request MetroLINK to provide bus service for the golf tournament?

It is improbable that MetroLINK autonomously conceived, designed and operated this service, which involved more than 20 buses operating 12-16 hour days for approximately eight days in tight synchronization with golf tournament activities. In addition to this logical assumption, Allerton's video provides proof that the golf tournament's sponsors requested the service. The video shows special signage on buses and at various parking locations labeled "The State Farm Good Neighbor Shuttle" and displayed the logos of both State Farm and John Deere. The shuttles obviously were requested by and operated for the golf tournament's sponsors.

Sincerely,

Richard P. Schweitzer

Counsel for Allerton Charter Coach, Inc.

Attachments/Enclosures