Transport Canada

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Cross-Border Passenger Bus Study

Final Report

Prepared for Transport Canada

By

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1. Executive Summary

1.1. Introduction

In an effort to facilitate the efficient and secure movement of goods and people across the Canada-U.S. border, Transport Canada has commissioned an evaluation that identifies impediments to cost-effective, convenient and competitive cross-border bus transportation. The intent is to better understand the current state of cross-border passenger bus services, identify existing challenges, and explore opportunities for improvements, while increasing the overall efficiency of border facilities and contributing to a more sustainable transportation policy.

The report, aligned with the mission of Canada's Gateways and Border Crossings Fund, focuses on five major Canada-U.S. land borders (seven individual crossings) that experience a high volume of bus traffic annually. In support of the study's objectives, RTR Technologies, LLC reviewed past analyses and conducted interviews with border stakeholders including bus companies, border agencies, and industry experts. The findings were compiled and analyzed over the course of a six week period and a final report was drafted for consideration by the Project Steering Committee.

1.2. Bus Services

The cross-border bus transportation lifecycle must be evaluated by individual service type, to include scheduled, chartered, tour and shuttle. The four service types cross for various reasons with mixed passenger sets that affect the border crossing process for buses in different ways. Over the last decade, the bus industry has embraced new business models and marketing tactics to remain competitive in the increasingly lucrative field of cross-border travel. The industry has attempted to distinguish itself by reinforcing its commitment to safe, reliable, and clean transportation while recognizing the need for modernization.

The bus industry has undergone a number of changes at the border since the terrorist attacks in the United States on September 11, 2001 (9/11). New document requirements and security initiatives presented significant challenges in the immediate wake of the event. As travellers and industry became familiar with a post-9/11 border, more normal growth levels resumed. While total crossings have yet to return to pre-9/11 levels, the industry has been able to mitigate the impact through the emergence of innovative new modes of bus travel and by adapting its border transportation objectives to meet the realities of the current Canada-U.S. land border.

Today, the bus industry continues to face challenges such as border wait times and new competition for cross-border travel. However, the industry has a number of factors working in its favour such as modernly equipped fleets and rising fuel prices, both of which should encourage cross-border bus travel. Working in conjunction with border agencies, the bus industry must actively address issues at and around the border and invest in the type of initiatives and technologies that will reduce wait times encountered when crossing.

Table 1- Bus Services Overview			
Service Type	**Considerations**	**Challenges**	**Opportunities for Improvement**
All Service Types Scheduled Service Charter Service Tour Service Shuttle Service	• Events of 9/11 • Document Requirements • Fuel prices • Strength of Canadian Currency • Environmental Alternative	• Port infrastructure • Wait time Information • Inspection Procedures • International Passengers • Border Uncertainty • Absence of Technology • Privacy concerns • Declaration Process	• Manifest Application • Manifest Transponder • Electronic Reservation System • Preclearance • Canadian and U.S. Declaration Forms • Engagement with Border Agencies

1.3. Border Agencies

Over the past decade, U.S. Customs and Border Protection (CBP) and Canada Border Services Agency (CBSA) have experienced significant change in their operations in an effort to carry out their missions, which include securing air, land and sea borders, preventing transnational criminal and terrorist organizations and illegal activity, while facilitating lawful travel and trade. As such, CBP and CBSA have steadily "hardened" port infrastructure to facilitate the lawful identification of vehicles and travellers entering each country. While security measures have increased and additional equipment and technology have been installed to assist with inspections, most ports' facilities have not been expanded or renovated in decades.

Since 9/11, and with recent events, more rigorous, thorough inspection procedures have been put in to place to ensure each traveller adheres to U.S. and Canadian admissibility requirements. Therefore, all travellers are expected to present the proper documentation and may experience additional time to cross the border. However, both CBP and CBSA have implemented new programs incorporating the use of technologies and preapproved "trusted traveller" initiatives to expedite the overall inspection process.

CBP and CBSA continue to face the ongoing challenge of securing the border while expeditiously and efficiently facilitating free trade and travel to maintain a bi-national economic balance.

Table 2 - Border Agencies Overview		
Considerations	**Challenges**	**Opportunities for Improvement**
• Old Facilities • Staffing Constraints • Port Hardening • WHTI Initiative[1] • Mandated Admissibility Requirements	• Limited Road Infrastructure • Inadequate Facilities for Bus Processing • Simultaneous Bus Crossings • Minimal Communication from Bus Companies • No Ability to Query Before Primary • Lack of Technology • Insufficient Capital for Improvements	• Use Commercial, FAST, and/or NEXUS lanes • Establish Off Site Processing Facility • Require Buses to Reserve Time and Stage Scheduling • Preclearance • Use of eAPIS • FAST Program for Bus Drivers • Use of PDAs, X-ray Equipment • Increase Engagement with Bus Industry and Stakeholders • Improve Public Relations • Engage Private Sector Funding

[1] The Western Hemisphere Travel Initiative (WHTI) requires U.S. and Canadian travellers to present a passport or other compliant document that denotes identity and citizenship crossing the Canadian or U.S. border.

2. Introduction

RTR Technologies, LLC performed an independent study in response to the Highway and Border Policy directorate, Transport Canada, request for research on current cross-border passenger bus services across the Canada-U.S. border. The goals of this project were to undertake an analysis of the current state of cross-border passenger bus services, identify impediments and recommend measures which Canada and the U.S., as well as passenger bus companies, could take to address these issues. The objectives of the project, as agreed by Transport Canada and RTR Technologies, were:

- To briefly describe the current state of scheduled and charter passenger bus services in Canada and the U.S;
- To provide an overview of the operations and services currently providing passenger bus services across the Canada – U.S. border (i.e. the number of buses crossing the border, high-volume crossings, make-up of the buses, general processing procedures, etc);
- To highlight and analyze the current challenges faced by passenger bus operators in regards to their cross-border operations, specifically, but not exclusively, related to customs processes and border infrastructure;
- To identify potential next steps for improving service and the flow of buses across the Canada-U.S. border.

The study consisted of teleconferences with key stakeholder organizations, as identified by Transport Canada and its Steering Committee members. The stakeholders included national bus companies in Canada and the U.S., transport agencies (provincial, state, and federal) and border customs agencies, as listed below in **Table 3**:

Table 3 – Organizations Interviewed[2]

Bus Companies and Advocacy Organizations	Border Agencies[3]
Motor Coach Canada	St-Bernard de Lacolle, Lacolle, Ontario
Canadian Bus Association	Champlain, Champlain, New York
Public Border Operations Association	Rainbow Bridge, Niagara Falls, Ontario
Tourism Association of Canada	Rainbow Bridge, Niagara Falls, New York
Transport Canada	Queenston-Lewiston Bridge, Queenston, Ontario
American Bus Association	Peace Bridge, Fort Erie, Ontario
Bi-National Economic and Tourism Alliance	Peace Bridge, Buffalo, New York
United Motor Coach Association	Ambassador Bridge, Windsor, Ontario
Niagara Falls Bridge Commission	Ambassador Bridge, Detroit, Michigan
Detroit-Windsor Tunnel	Windsor Tunnel, Windsor, Ontario
Amtrak	Windsor Tunnel, Detroit, Michigan
Border Policy Research Institute (Western Washington University)	Pacific Highway, Surrey, British Columbia
Whatcom Council of Governments	Pacific Highway, Blaine, Washington

[2] Please see appendix for detailed list of organizations interviewed.
[3] The Border Agencies studied were identified by Transport Canada and represent the most popular bus crossings between the Canadian and United States borders.

Prior to conducting the interviews, questionnaires (***see appendices***) were drafted by RTR Technologies and vetted by the Steering Committee to ensure that the pertinent issues would be addressed with the vested stakeholders. The questionnaires consisted of broad issues relative to the bus industry and border crossing logistics. Stakeholders received introductory correspondence noting specific references from Steering Committee members in an effort to obtain interviews. RTR Technologies scheduled approximately one hour teleconferences with each of the stakeholders and completed independent research within the scope of the study. Given the scope of the project, there was limited time allotted to each teleconference and no in-person interviews were completed. Likewise, the study did not include site visits to the individual ports, which precluded a more comprehensive study of the crossings.

All findings are contained in this Cross Border Passenger Bus Study report and are organized in two sections. Section three is a detailed report of findings gathered from the bus industry and Section four is a broad overview of the CBSA and CBP facilities and operational issues. The findings also include possible opportunities recommended by the stakeholders to improve the efficiency and flow of bi-national business and cross-border tourism.

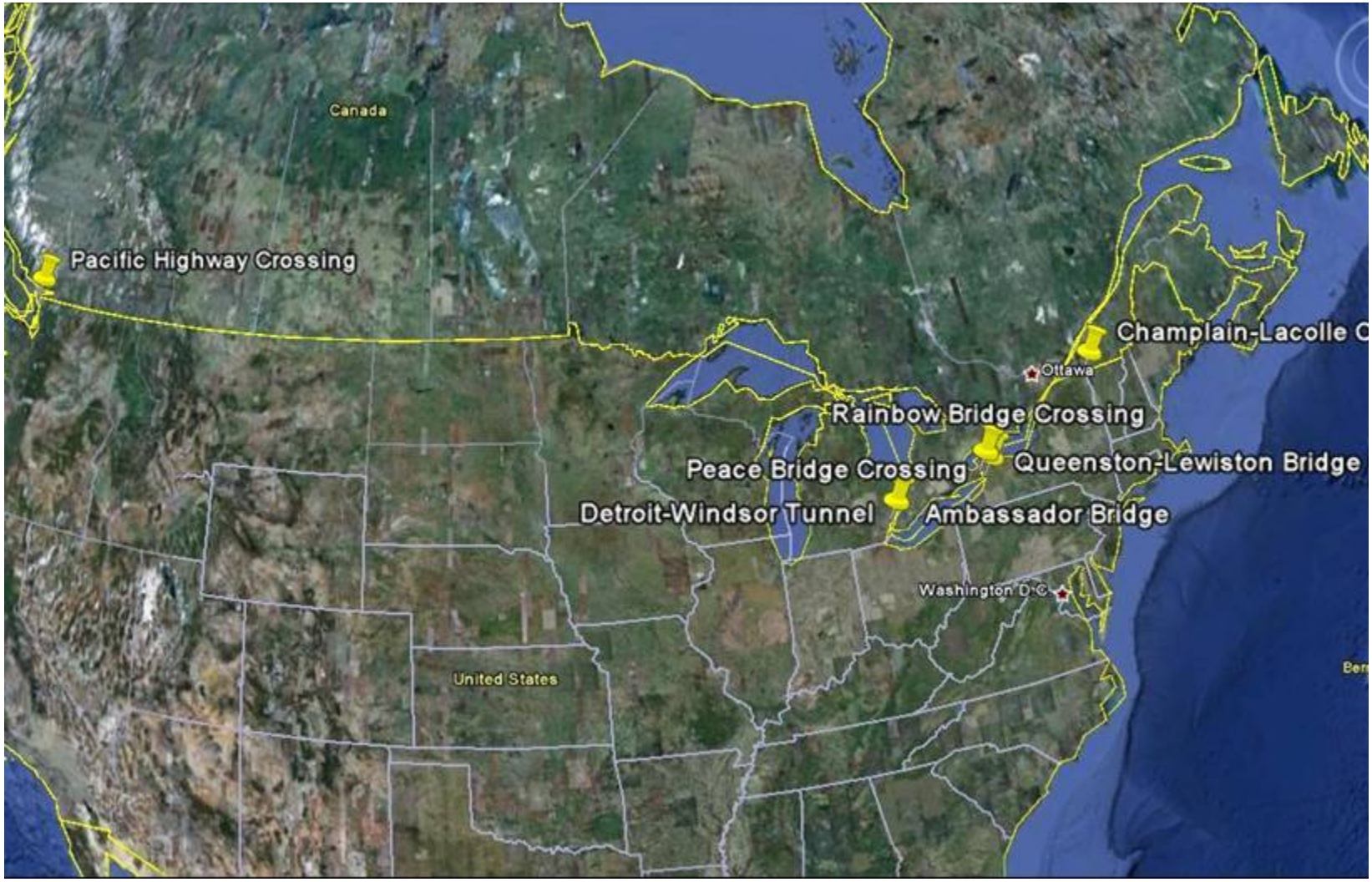

Figure 1 – Map of Crossings on the Canadian-U.S. Border

3. Bus Services

Bus services must be evaluated in the context of varying service types. Buses cross the border for a range of reasons with mixed passenger types, all of which have a significant effect on the entire cross-border bus transportation lifecycle.

Over the course of the last decade, the industry has embraced new business models and marketing tactics in order to compete with other modes of low cost transportation. Considered a mature industry in terms of growth potential[4], bus services have modernized their fleets with an emphasis on clean, safe, and reliable cross-border transportation as they continue to serve millions of travellers every year.

The bus service industry experienced significant increases in revenue in the mid 1990's with the influx of new bus designs. European style buses with multiple-levels, panoramic windows, and a more luxurious interior enticed a new generation of more affluent travellers who had not considered bus travel a viable option in the past. The industry will continue to seek new customers and maintain their traditional base as they compete for passengers who seek safe, cost-effective cross-border transportation.

3.1. Current State of Bus Industry

Crossing Trends

In order to understand the current state of the bus service industry in relation to cross-border travel, it is important to first consider the events of 9/11. In the immediate wake of 9/11, the bus industry, like all industries that relied on cross-border travel, was significantly affected by the increased security procedures that were established in response. The 'thickening' of the border which was primarily, but not exclusively confined to U.S. entry, dramatically reduced the total number of buses crossing the border. While never returning to pre-9/11 levels, the scheduled and charter industry rebounded more quickly than other modes of cross-border transportation and emerged as a safe alternative to air travel.

Since 9/11, there have been a number of new document requirements for bus travellers into both the U.S. and Canada. While most have been mandated by the U.S. Department of Homeland Security (DHS), new requirements have also been mandated by Canada's Department of Citizenship and Immigration (CIC). In the U.S., the Western Hemisphere Travel Initiative (WHTI) was enacted in June of 2009 at land and sea borders. This program requires U.S. and Canadian travellers to present a passport or other specific document that denotes identity and citizenship when entering the U.S. and was enacted as a result of the Intelligence Reform and Terrorism Prevention Act of 2004 (IRTPA).

Bus operators initially feared that new document requirements would deter potential customers from crossing the border. In the immediate aftermath of WHTI implementation, cross-border travel from Canada to the United States was significantly reduced. A 15.9% reduction in total

[4] Point made in discussion with Ontario Motor Coach Association

traffic was reported along the Canadian border from May to June of 2009[5]. In the previous five years, travel to the U.S. had never declined from May to June. However, beyond this period while total overall crossings declined, reductions in total crossings cannot be directly attributed to WHTI. The economic recession and increased gasoline prices were also major contributors to the drop in total vehicle crossings at the border[5].

When looking at total bus crossings there are no clear trends that emerge. Total bus crossings while commonly thought to be declining in both directions, vary among different land borders. While total crossings may be significantly reduced from pre-9/11 levels, total bus crossings must be evaluated on a port by port basis.

The Canada-U.S. border spans 8,891 km across land and water. There are 120 Canadian vehicular land ports of entry (119 U.S.) with 24 major bridge crossings and one tunnel. In 2010, buses entered Canada at 97 individual land border crossings. Buses entering Canada using the seven crossings studied comprised 57% of total bus crossings[6]. In 2010, buses entered the United States from Canada at 73 individual land border crossings[7]. Of the 73 total crossings, the seven crossings evaluated handled 67% of all U.S. bound bus traffic.

In 2009, Canada bus travel serviced 1.6 million passengers entering the U.S., a 22% reduction from 2008[8]. However, Canadian bus services revenues have shown strong year over year growth since 1999. Tour and shuttle services realized the most significant gains from 1999 to 2008 with yearly revenues increasing by 212%. Scheduled service revenues increased 108% and charter services increased by 95% over the same period. Canadian bus industry revenues (including government contributions) totaled some $11.4 billion dollars in 2008[8].

[5] Western Washington University. Border Policy Research Institute: WHTI, the Recession, and Cross-Border Travel, Volume 5, No. 3, Summer 2010.
[6] CBSA Headquarters Data – March 2010.
[7] CBP Operational Management Reporting System (OMR) – March 2010.
[8] Transport Canada. "Transportation in Canada: An Overview". 2009

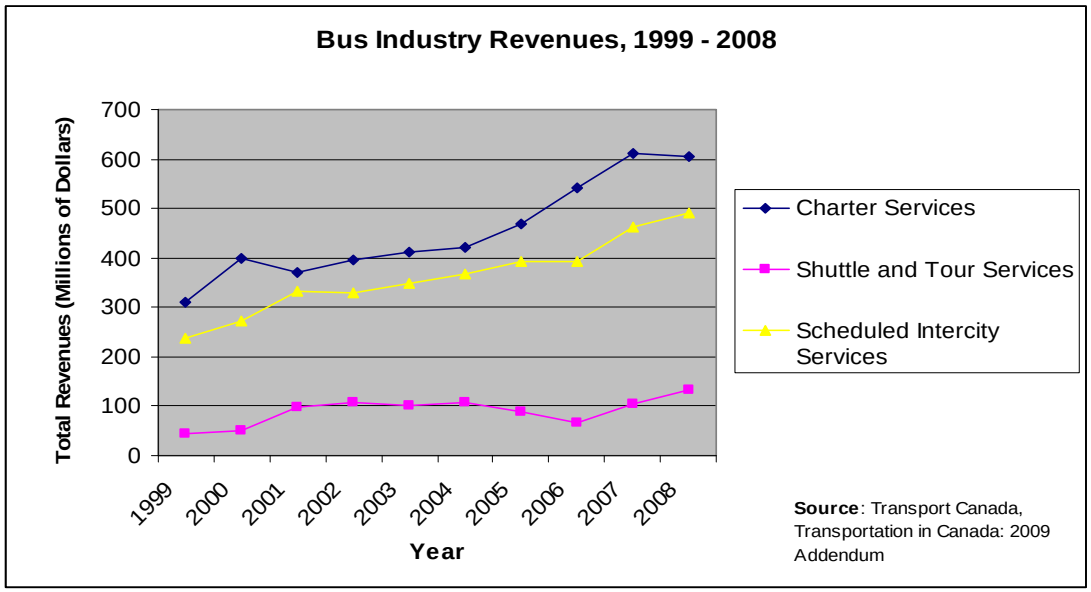

Figure 2 – Bus Industry Revenues

Fuel Prices

The price of gasoline is a variable that affects business in a multitude of ways. With the increased cost of fuel over the last five years and the expectation that prices will further increase, bus travel will likely be an attractive option for drivers. For industry, it is imperative that the increase in travellers outweigh the expense associated with fuel costs in order to generate a net increase in revenue.

For commuters, and to a large extent the scheduled service industry, the increase in gasoline prices works in their favour. When gasoline was $4 per gallon (U.S. dollars) in the U.S., some American bus companies reported more than a 20% increase in ridership[9]. Customers who see the direct impact of higher prices on their driving, and must travel, typically look for less expensive modes of transportation. In these cases, the incremental increase in a bus fare due to fuel prices will be less than the incremental cost of driving a car with the same increase.

For charters and tour buses, the economic incentive often works in reverse. The increased fuel cost increases the daily charter rate to the point where a charter group may not decide to travel at all. Indeed, in cases where a bus is chartered for a fixed fee over a period of time and the fuel price escalates within that period, the charter company must absorb the cost of the increase with no commensurate increase in revenue. In total, the fuel price trade off has generally worked in the bus industry's favour though it is not assured that the trend will continue.

Canadian Currency

The increase in value of the Canadian currency relative to the American dollar has enhanced the appeal of shopping in the U.S. for Canadians. The strong Canadian dollar allows Canadians to purchase more consumable goods at an advantage in relation to their listed price (U.S. dollars).

[9] Point made in discussion with American Bus Association

For the bus industry, charter and tour buses have experienced an increase in demand for cross-border trips related to shopping in the U.S. With the Canadian dollar in its strongest position since 2007[10], the bus industry expects demand for shopping transportation to remain high.

Environmental Alternative

Bus services have increasingly become an environmentally friendly alternative to cars. Many young and affluent passengers see it as a socially responsible way to travel. In 2008, Megabus gave away 100,000 bus tickets in order to increase awareness of the need to reduce carbon emissions by encouraging bus travel. According to Megabus, one coach filled to capacity, which would take 56 cars off of the road and means 3,850 fewer pounds of carbon emissions for every 100 miles traveled, compared with the emissions of 56 cars travelling the same distance[11]. As gasoline prices continue to rise and social concerns remain paramount to those who travel, bus service with its environmental cachet, will continue to be an integral part of the industry's plan for increased growth.

3.2. Challenges to All Bus Service Types

Port Infrastructure

The infrastructure for buses at ports across the country does not allow them to quickly and efficiently reach the primary inspection facilities. During periods of peak demand, buses are often obstructed by cars and trucks from reaching open bus processing structures. Moreover, buses must wait with general traffic and may experience wait times in excess of 60 minutes during the summer months and holidays.

Absence of Wait Time Information

At most crossings along the US/Canadian border wait times are not disseminated for buses exclusively. For cars and commercial vehicles, CBSA and CBP disseminate hourly wait times, which are published on their respective websites (**Figure 3 and Figure 4**), but wait times for buses may be different depending on the accessible access roads/lanes to the ports and available operational resources dedicated to bus processing. Without information on conditions for buses in particular, coach operators are unable to make crossing decisions based on conditions at the border. While many crossings include bus wait times as part of their passenger vehicle wait time dissemination process, a clearer distinction may be desirable. The length of bus and passenger vehicle queues can often vary significantly.

[10] Mead, Charles. "Canadian Dollar Rallies to Highest Since 2007 as GDP Growth Beats Forecast". Bloomberg News. 28 February 2011. Web.
[11] Ogle, Alex. "High Gas Prices Boost Bus Travel." The Christian Science Monitor. 1 August 2008. Web.

Canadian Border Ports of Entry

Port Name *Crossing Name*		Commercial Vehicles			Passenger Vehicles			Pedestrian	
	HOURS	Max Lns	STANDARD	FAST	Max Lns	STANDARD	NEXUS	Max Lns	STANDARD
Alexandria Bay *Thousand Islands Bridge*	24 hrs/day 2/28/2011	3	At 11pm EST no delay 1 lane(s) open	N/A	9	At 11pm EST no delay 1 lane(s) open	Lanes Closed	N/A	N/A
Blaine *Pacific Highway*	24 hrs/day 2/28/2011	4	At 5pm PST 45 min delay 3 lane(s) open	Lanes Closed	8	At 5pm PST 25 min delay 3 lane(s) open	At 5pm PST no delay 1 lane(s) open	N/A	N/A
Blaine *Peace Arch*	24 hrs/day 2/28/2011	N/A	N/A	N/A	10	At 5pm PST 15 min delay 3 lane(s) open	At 5pm PST no delay 1 lane(s) open	N/A	N/A
Buffalo/Niagara Falls *Lewiston Bridge*	24 hrs/day 2/28/2011	4	At 10pm EST no delay 2 lane(s) open	N/A	6	At 10pm EST no delay 2 lane(s) open	N/A	N/A	N/A
Buffalo/Niagara Falls *Peace Bridge*	24 hrs/day 2/28/2011	7	At 10pm EST no delay 6 lane(s) open	N/A	11	At 10pm EST no delay 4 lane(s) open	Lanes Closed	N/A	N/A
Buffalo/Niagara Falls *Rainbow Bridge*	24 hrs/day 2/28/2011	N/A	N/A	N/A	17	At 10pm EST no delay 5 lane(s) open	Lanes Closed	N/A	N/A
Buffalo/Niagara Falls *Whirlpool Bridge*	7am-11pm 2/28/2011	N/A	N/A	N/A	2	N/A	At 10pm EST no delay 1 lane(s) open	N/A	N/A

Figure 3 - CBP Border Wait Time Page

CBSA Office	Commercial Flow	Travellers Flow
All times local.	Canada bound	Canada bound
St. Stephen St. Stephen, NB/Calais, ME Last updated **2011-02-28 22:56 AST**	Not applicable	No delay
Woodstock Road Belleville, NB/Houlton, ME Last updated **2011-02-28 21:56 AST**	No delay	No delay
Stanstead Stanstead, QC/Derby Line, VT Last updated **2011-02-28 22:02 EST**	No delay	No delay
St-Armand/Philipsburg St. Armand, QC/Highgate Springs, VT Last updated **2011-02-28 21:59 EST**	No delay	No delay
St-Bernard-de-Lacolle Lacolle, QC/Champlain, NY Last updated **2011-02-28 22:00 EST**	No delay	No delay

Figure 4 – CBSA Border Wait Time Page

Increased Inspection Times

The bus industry notes the increasing amount of time that passengers spend at primary inspection. The bus industry desires increased certainty in the time it will take their fleets to cross the border to ensure they meet scheduled arrival and departure times.

Privacy Concerns

Due to privacy concerns on behalf of the bus service industry, many operators are unwilling to collect and distribute passenger identification information to border agencies for prescreening purposes. This prevents a more robust manifesting system from being implemented that would reduce inspection times.

Absence of Inspection Information Available

Bus operators noted that there is a lack of information regularly disseminated regarding security and inspection procedures. Information pertaining to document requirements and updated security procedures are not communicated to the bus industry on a regular basis. Passengers are often unprepared when they reach the primary inspection facilities as a result.

Absence of Technology

Many bus operators do not possess technology that would allow them to submit or receive information electronically to and from border agencies. However, some bus operators that did submit passenger information in advance claimed that certain ports would not use the information for preliminary processing prior to reaching primary. This issue was a commonly reported deterrent to the more widespread use of manifesting within the bus services industry.

CBSA and CBP Declaration Process

Travellers entering Canada with goods purchased in the United States must pay "Duty", which is a tax imposed on the purchases of certain goods by the Canadian government. When a large group of bus passengers return to Canada after shopping in the United States, the inspection process can take a significant amount of time as CBSA determines the appropriate amount of duty to be paid for each traveller. The Canadian government is currently piloting the use of a paper E-311 form to expedite the declaration process for buses.

Travellers entering the U.S. declare goods by way of a verbal declaration. After a verbal declaration is made, CBP may choose to impose a duty on imported good pursuant to CBP policies. Any duties collected may add additional time to the inspection process.

Border Transportation Liability

Scheduled service operators are held liable for providing transportation back to the point of origin when passengers are refused entry[12]. This issue is salient for non-US citizens traveling without a "permit". These passengers cannot prove that they are not intent on immigrating to the United States. In the case that a passenger is refused, the bus company is responsible for providing transportation from the port to the original pick up location. This places a financial burden on the bus companies as they must often send an alternate vehicle to the port to pick up the refused passenger.

[12] Point made in discussion with Greyhound Canada

3.3. Scheduled Bus Services Overview

Services that provide intercity bus transportation on a fixed time schedule are known as scheduled services. These services include the traditionally well known bus operators such as Greyhound and Stagecoach. In Canada, the two largest scheduled service providers are Coach Canada and Greyhound Canada.

Scheduled services typically operate out of bus terminals or stations and transport passengers between them. They often function as a low cost alternative to driving and serve a demographic mainly comprised of young adults (under 30) and senior citizens[13].

Market Trends for Scheduled Bus Services

As border wait times returned to more manageable levels the past three years, scheduled services resumed normal levels of year to year growth in the range of 5%[14]. Revenue growth was particularly strong in 2010 for a number of scheduled bus operators with revenues at Greyhound Canada increasing approximately 10% from 2009 to 2010[15].

Megabus Model

Much of the growth in the scheduled service industry can be attributed to the emergence of the "Megabus Model". These low cost, digitally enabled, and modernly designed buses serve major metropolitan areas mostly confined to eastern Canada as well as the Midwest and northeastern portions of the United States. Offering fares as low as $1 depending on how far the trip is booked in advance and how many passengers have purchased tickets, service providers such as Megabus, BoltBus and the various Chinatown bus lines have grown exponentially over the last five years. Industry experts expect that the "Megabus Model", predicated on point to point metropolitan service, will continue to grow as a proportion of the scheduled service industry's total revenue[16].

Ticket Purchasing

Scheduled bus service will continue to evolve as the method passengers use to purchase tickets expands. While the industry has been historically reliant on ticket sales at bus stations, a growing portion of ticket sale revenue is now generated through online sales. Megabus and BoltBus ticket services are exclusively bought and paid for online and both companies plan on adopting ticketless systems which rely on the use of Smartphone's. Other scheduled bus service companies have introduced locations where tickets are sold at electronic satellite kiosks placed at the bus station and also outside of it at locations including major universities. As scheduled bus carriers attempt to compete with new low cost airlines whose fairs are available through a variety of travel websites, they have made the dissemination of online discounts and special online fares a priority. The industry is adopting new online purchasing platforms in response to demand from young travellers who prefer internet and cell phones when buying. While tickets purchased at bus stations still make up the majority of current revenue, industry officials acknowledge that

[13] Point made in discussion with executive officials from Greyhound Canada
[14] Point made in discussion with executive from American Bus Association
[15] Point made in discussion with executive officials from Greyhound Canada
[16] Point made in discussion with American Bus Association

online sales will eventually become the dominant source of ticket revenue over the next decade[17].

3.3.1. *Challenges to Scheduled Bus Services*

Discount Airlines

Intercity scheduled bus service now competes with the ever increasing number of discount airlines. As an emerging business model, discount airlines offer comparable fairs for traditionally popular intercity, cross-border bus trips. Popular trips such as Toronto to New York City and Toronto to various Florida destinations were once heavily serviced by scheduled operators. They are now split among bus and air transportation with the air companies quickly increasing their share of this market. Bus companies have attempted to compete by improving the amenities offered on buses and reducing prices where possible. The recent success of Megabus and BoltBus provide an opportunity for scheduled services to make up a portion of the lost revenue.

Inspection Uncertainties

The uncertainty related to customs procedures[18] and inspection times at the border are primary concerns for the scheduled service industry. Bus industry officials reported significant disparities in border wait times depending on a range of different factors encountered when attempting to cross.

With an understanding that wait times could be significant when crossing, bus operators build into their schedule a certain border allotment when scheduling arrival times. This border allotment can range anywhere from 30 to 90 minutes. An increase in the built in time for border waits was reported by Greyhound Canada in 2010[19].

3.4. Charter Services

A charter service is one in which a bus operator is privately hired on a contract basis. The charter operator provides the bus and qualified driver for an established fee over a fixed amount of time. Charter buses typically serve homogenous groups of passengers transporting them to major events and popular destinations. The majority of charter companies are small, independent businesses though some are also subsidiary businesses of a scheduled or public transport operator that maintains a separate fleet of buses. Charter buses often function as the most cost effective method for large groups when traveling long distances to sporting events or shopping malls.

[17] Point made in discussion with Ontario Motor Coach Association.
[18] Canadian Chamber of Commerce. "Finding the Balance: Reducing Border Costs While Strengthening Security". Feb. 2008.
[19] Point made in discussion with Greyhound Canada.

3.4.1.*Challenges to Charter Bus Services*

Illegal Charter Operators

The charter services industry has been damaged by the pervasive existence of so called "Rogue Charter Companies." These companies exist without investing in the type of regulatory and safety compliance measures that are required and are often able to travel across the border with impunity. Without the economic costs associated with compliance, these illegal outfits offer bus passengers below market pricing which puts downward pressure on prices for legitimate carriers. Responsible operators ensure that they recruit and train safe drivers, monitor driver conditions and performance, and inspect and maintain their vehicles to prescribed standards. The charter industry desires much stronger regulation and enforcement of compliance law.

Buses traveling from Canada to the United States must register with the US Department of Transportation (USDOT) in order to operate legally. The following regulatory compliance measures are required of all bus operators:

- Register with the USDOT and post USDOT compliance number on the side of bus.
- All drivers must be enrolled in a random drug and alcohol screening.
- Register with International Fuel Tax Agreement (IFTA). Remittance of fuel taxes based on jurisdiction.
- All bus operators must have adequate liability insurance
- International Registration Plan (IRP) – Pro-rated license plate registration reciprocity agreement.

Inflexible Crossing Schedule

Without a schedule or the flexibility to cross during periods of low demand, charter buses must cross the border during peak times en route to major events or scheduled destinations. Charter buses typically operate under a fixed contract with clients and therefore the scheduled crossing time is determined in advance and bus drivers do not have the ability to use discretion based on border conditions.

3.5. Tour Bus Services

Tour bus services transport passengers to popular tourist and sightseeing destinations. It is estimated that there are over 3,000 highway tour coaches in Canada which significantly contribute to the Canadian economy. Each tour bus on an overnight tour generates $7,000 - $13,000 in economic activity including spending on accommodation, entertainment, meals, and various souvenirs[20]. Services have traditionally been driven by senior citizens on tours; however, their percentage of total trips has been significantly reduced over the last decade. Currently, touring for student groups to the eastern United States, is the fastest growing sector within the tour bus industry.

[20] Point made in discussion with Motorcoach Canada

3.5.1.*Challenges to Tour Bus Services Industry*

Wait Times

Tour operators claimed that they regularly wait for an extensive period of time once they reach the bus processing facility before an officer boards the bus and provides passengers with instructions to proceed (both U.S. and Canadian ports of entry). Tour operators reported waiting outside of the processing facility for upwards of 30 minutes before disembarking the bus. When combined with the processing procedures, this can translate into border wait times of greater than 60 minutes.

Illegal Tour Operators

Legitimate tour bus operators, like charter services, are constantly competing with illegal and non-compliant rogue operators within the tour industry. Illegal tour operators put downward pressure on prices for legitimate carriers which reduce total revenues. The tour industry is actively pushing for more stringent enforcement of compliance law.

International Passengers

A large portion of tour passengers are often international travellers who require particular permits and documentation at the border. As a result, the primary processing procedure can take a significant amount of time for tour services with large groups of international passengers. It should be noted that this is not a criticism of CBSA/CBP. Under federal law, both agencies have a number of processing regulations that must be adhered to.

3.6. Shuttle Bus Services

The shuttle bus service industry transports passengers for relatively short distances to destinations like airports and trains. Shuttle buses operate on strict schedules as their customers typically have another form of transportation that also operates on schedule. Therefore, the efficiency of cross-border transportation is especially important for shuttle buses.

The most common shuttle bus that crosses the border is one which transports passengers from a set location to a nearby airport. There are several shuttle buses in the Ontario/New York region which provide transportation from a variety of cities in Ontario to the Buffalo Niagara International Airport (BNIA). In the British Columbia/Washington region, buses transport passengers from cruise ships and the airport to the Seattle-Tacoma Airport (SEA).

3.6.1.*Challenges to Shuttle Services*

Border Waits Affect Schedules

Shuttle buses operate on set schedules in which they transport passengers from a set location to an airport or form of transportation also operating on schedule. When shuttle buses wait for extensive periods of time at the border, they are at risk of missing scheduled departure times.

At the Pacific Highway crossing, Amtrak Train Line has an interline ticket agreement with the shuttle service Cantrail to transport passengers from Canada to the Amtrak station in Seattle. When attempting to enter the United States, the Cantrail shuttle reported waiting in excess of

four hours on several occasions. Because of high demand and a narrow approach configuration which creates gridlock between cars, trucks, and buses, wait times for shuttle buses regularly exceed one hour during the summer. When a Cantrail bus is delayed at the border and its passengers may miss their connecting trains, Amtrak makes a decision to either allow the train to leave or hold the train for the Cantrail passengers to arrive at the station. Either decision results in lost revenue for Amtrak. The airline industry on the other hand does not have the luxury of holding planes if necessary.

International Passengers

A large portion of shuttle bus passengers, like tour passengers, are international travellers who require particular permits and documentation at the border. As a result, the primary processing procedure can take a significant amount of time for shuttle services with large groups of international passengers.

3.7. Opportunities for Improvement for All Service Types

Reservation System

The bus industry, in conjunction with the respective border agencies, should consider the development of a computer based bus reservation system. This system would allow buses to reserve an inspection time or window at a designated border crossing. The system's intent would be to reduce wait time by providing all bus operators and ports with the opportunity to view crossings days/weeks/months in advance and schedule their own future departure and arrival times. This computerized system should be web hosted and meet all the security requirements of both governments and the participating industries

Any such system, however, is not without obvious drawbacks. Buses often have problems reaching an open processing facility (vehicle obstruction) and therefore there is no guarantee that a scheduled bus could reach the facility for its reservation. Moreover, scheduled and shuttle buses operate on predetermined schedules and lack the ability to cross when demand is low. As such, it is likely that they would need to book their reservations at the same time as other buses and continue to cross during high-volume periods. Finally, without some enforcement mechanism, buses may cross without a reservation if it is in their interest to do so.

Pre-clearance

A robust preclearance program that facilitates the ability of regular bus operators and passengers to reduce time spent at the border by being cleared prior to crossing is a concept heavily favoured by industry.

Manifest Transponder

Bus operators, in conjunction with the border agencies, should consider the use of an electronic manifest transponder. The transponder would possess passenger and operator information and be read when the bus arrived at the facility in range of the transponder reader. Similar initiatives have been successfully undertaken by CBP with commercial vehicles and by CBSA and CBP with passenger vehicles at most land borders through the use of Radio Frequency Identification (RFID) technology.

RFID technology has been used extensively by the border services agencies. For example, CBP uses the technology in their FAST commercial inspections program, NEXUS and SENTRI trusted traveller programs, and most recently the WHTI program. Each RFID device has a unique identifying number associated with a driver, a traveller, or a particular vehicle. This number with an accompanying biometric identifier is provided to a border official in the primary inspection booth when the document is read. This same number could be used to pull up the reservation including all registered passengers. This allows officers to begin prescreening passengers before they arrive at the inspection booth and works to reduce inspection times. Both the Canadian and U.S. Governments have encouraged the adoption of RFID crossing documents which also include the Enhanced Drivers License (EDL) and Passport Card (U.S. Citizens only).

Bus operators should participate in the electronic Advanced Passenger Information System (eAPIS). The eAPIS is a user-friendly, web-based interface designed by U.S. Customs and Border Protection (CBP). This system is used by commercial carriers and the private aviation community to provide required information to CBP electronically. The eAPIS functionality includes the submission of notices of arrival and/or departure and traveller manifests (crew and passenger) to CBP, the transmission of master crew lists to TSA, and the ability to view carrier reports.

In conjunction with the respective border agencies, bus operators would submit passenger information through the application allowing CBP or CBSA to screen passengers before they arrive. In order to account for operators who pick up travellers at several locations en route to their destination, bus operators should consider the adoption of a portable submission device. Similar to a PDA or tablet device, it would allow drivers to quickly submit traveller information before reaching the border. It should be noted that all bus passengers should already be carrying proper documentation in accordance with WHTI. Any such application may require an investment by the bus operators in acquiring the necessary technology.

Utilize Canadian E-311 Declaration Form

Bus operators should regularly disseminate Canadian E-311 declaration forms to bus passengers when traveling across the border. Bus drivers should ensure that declaration cards are distributed to passengers with sufficient time provided for completion prior to reaching primary inspection. In addition, the forms also require input from the bus drivers. These programs have been successfully used by the Airline industry and will reduce border inspection times for buses if implemented properly.

Increased Engagement with Border Agencies

Many of the border agencies and regional stakeholders hold regular meetings to discuss border wait times and other border related issues. According to industry, border agencies, and stakeholders, the bus companies rarely participate in these meetings. Bus companies should increase efforts to participate in meetings as necessary. Additionally, bus companies should increase general communication with border agencies on a daily and weekly basis, alerting them of expected number of crossings and arrival times. Passenger information and expected crossing times are information that bus companies could submit to reduce inspection time and ensure that ports are appropriately staffed.

4. Port Findings

Transport Canada requested RTR Technologies to focus its study exclusively on passenger buses crossing the Canadian-U.S. border at the following locations:

- Pacific Highway at Surrey, BC/Blaine, WA
- Windsor-Detroit Tunnel at Windsor, ON/Detroit, MI
- Ambassador Bridge at Windsor, ON/Detroit, MI
- Rainbow Bridge at Niagara Falls, ON/Niagara Falls, NY
- Queenston-Lewiston Bridge at Queenston, ON
- Peace Bridge at Fort Erie, ON/Buffalo, NY
- St Bernard-de-Lacolle at Lacolle, QC/ Champlain, NY

These sites were selected given that the majority of the bus crossings at the Canadian-U.S. border take place at these particular crossings. RTR Technologies conducted teleconferences with port management at each selected border station; however, the scope of the project did not include site visits to the ports or a quantitative analysis. Each port was interviewed to obtain background information on access roads leading to the port, available port infrastructure and general overall logistics for bus processing. The ports also discussed their relationship with bus companies and bus reporting methods prior to arrival. Based on available infrastructure and technologies, the interviews identified existing challenges and constraints and possible solutions for handling a large volume of buses during the peak seasons.

Listed below is a summary table of port findings, which outlines access roads and approach lanes to the ports, port infrastructure, use of technology and outreach with the bus industry.

Results of the port interviews for each crossing proceeds the summary table below and highlights the facilities and operational issues pertaining to bus processing and inspections.

Table 4 – Ports of Entry Overview						
Crossing	**Road Infrastructure**	**Designated Approach Bus Lane**	**Bus Processing Terminal**	**Manifest**	**Technology**	**Outreach**
Pacific Highway US inbound	2 lanes expanding to 5	Yes	Yes	Pre-clear bus passengers returning from cruises at Vancouver	Standard	Meet with local stakeholder group
Pacific Highway Can Inbound	3 lanes	Shared lane with NEXUS Traffic	No	Limited use	Standard	Meet with local stakeholder group
Windsor Tunnel US Inbound	2 lanes	No	No, Plans to construct separate bus terminal	Attempting to implement eAPIS	Standard	Communicate with bus companies regarding arrivals
Windsor Tunnel Can Inbound	2 lanes	No	Plans to construct separate bus terminal	Receive faxes	Standard	Distribution of E311 cards to bus companies
Ambassador Bridge US Inbound	2 lanes	No	No	No	Piloting PDA, No baggage x-ray	Communicate with bus companies regarding arrivals
Ambassador Bridge Can Inbound	2 lanes	No	No	No	Standard	Distribution of E311 cards to bus companies

Table 5 – Ports of Entry Overview						
Crossing	**Road Infrastructure**	**Designated Approach Bus Lane**	**Bus Processing Terminal**	**Manifest**	**Technology**	**Outreach**
Rainbow Bridge US Inbound	2 lanes	No	No	Fax	Pilot PDA	Monthly meetings
Rainbow Bridge Can Inbound	2 lanes	No	No	Excel spreadsheet	Standard	Regular meetings, Distribution of E311 cards to bus companies
Queenston-Lewiston Can Inbound	2 lanes, 3rd lane can be opened	Use commercial lane	Open new facility 2011	Excel spreadsheet	Standard	Regular meetings, Distribution of E311 cards to bus companies
Peace Bridge US Inbound	2 lanes, one lane can be closed	No	Yes	Excel spreadsheet	Pilot PDA	Regular meetings
Peace Bridge Can Inbound	2 lanes, one lane can be closed	Yes	Yes	Pilot	Standard	Regular meetings
Champlain US Inbound	3 lanes	No but can use FAST lane	No	Receives faxes, Piloting eAPIS and PDAs	No baggage X-ray	Regular meetings with tour operators/bus companies
Lacolle Can Inbound	2 lanes	Bypass road to reach port	Yes	No pre-notification	Standard	No regular meetings

4.1. Challenges to All Border Agencies

Limited Road Infrastructure

Except for Pacific Highway and the Lacolle/Champlain Canadian-U.S. crossings, there are limited road infrastructure and access lanes to enable buses to directly reach the port inspection facilities. Most of these crossings are limited by being adjacent to bridges, and in one case a tunnel. These bridges and tunnel have a built in restriction in number of access lanes making it prohibitively expensive for government or bridge and toll authorities to expand. With limited approach lanes available, special access lanes are difficult or impossible to implement and therefore, buses must queue with general traffic and may experience long wait times.

Bus Processing Facilities

Other than the Buffalo and Pacific Highway crossing, the remaining ports under study do not have adequate bus processing facilities or the capacity to efficiently handle full bus loads of passengers, inside, in a controlled environment. Additionally, the majority of ports are only equipped to process one bus at a time.

Sometime during 2011, the Queenston, Ontario crossing will open a "state-of-the art" bus processing facility, which will increase bus processing capacity and potentially improve wait time and reduce congestion for northbound bus traffic at Rainbow Bridge and Peace Bridge in upstate New York.

Arrivals

According to interviews with the ports, most charter bus operators do not schedule their arrivals and typically converge on the ports around the same time, including buses transporting passengers to sporting events.

Staffing

Most ports do not have sufficient staffing to handle a large influx of buses that cross during peak times of the year.

Canadian and U.S. Declaration Procedures

Travellers entering Canada are required to declare goods purchased in the U.S. and pay taxes at the port. Travellers entering Canada on a bus are encouraged by CBSA to complete an E-311 declaration form. The form is intended to reduce the declaration process. However, the declaration process as it currently stands, continues to be a time consuming, mandatory policy and results in additional processing time for bus passengers.

Non-commercial travellers entering the United States do not complete a written declaration. All declarations are verbally volunteered. All goods are taxed in compliance with CBP policy and the inspection processes can take additional time for those passengers making a customs declaration when entering the U.S.

4.2. Pacific Highway Crossing

The Pacific Highway crossing connects Highway 15 in Surrey, B.C. with U.S. Route SR-543 in Blaine and serves as the main crossing in the region for commercial traffic, buses and vehicles.

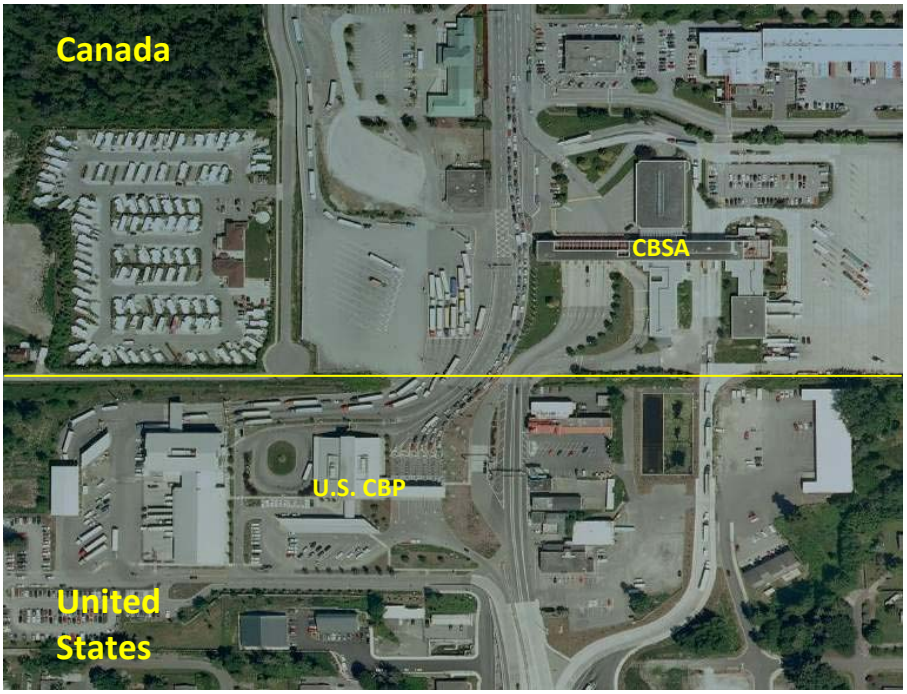

Figure 5 – US/Canadian Border at Pacific Highway

4.2.1. *US Inbound*

Facilities

There are two approach lanes from Canada which expand to five lanes leading to the U.S. plaza. Of the five lanes, one lane is dedicated for buses, one lane for NEXUS cardholders, one lane for FAST traffic, and two for privately owned vehicles. During peak travel, bus traffic occasionally backs up past the plaza and cannot bypass other traffic in order to proceed to the bus lane approaching the port. However, CBP will periodically use the NEXUS lane to process buses if staffing is available. Additionally, the port is piloting the use of the "FAST" approach lane for buses in order to reduce wait times and pre-primary congestion. FAST traffic will be diverted to the general commercial lanes.

The port has a separate bus terminal, however the facility lacks adequate parking space for buses. The result is that buses back up into the pre-primary bus lane creating bottlenecks for all traffic. It was reported that funding is being pursued to purchase additional primary workstations to facilitate inspections of bus passengers. Moreover, CBP expects to open the Douglas/Peace Arch crossing in the spring of 2011 to limited bus traffic in order to increase southbound bus processing capacity.

Operations

The months of June through September are the busiest time of the year for bus traffic. According to the port, they will experiences periods in which upwards of approximately 100 buses are processed over an eight hour period. During the summer, there are also charter buses that may arrive at the same time carrying international passengers with immigration and various admissibility issues.

In the summer, large bus queues are primarily the result of cruise ships that disembark passengers en route from Canada to the Seattle Airport (SEA). Passengers are offloaded onto multiple buses, which typically cross the border simultaneously. It should be noted, however, that passengers returning to Vancouver from Alaskan cruises are often "pre-cleared" at the seaport in Canada before boarding buses heading to the U.S. border. This procedure minimizes the inspection process upon arrival at the port.

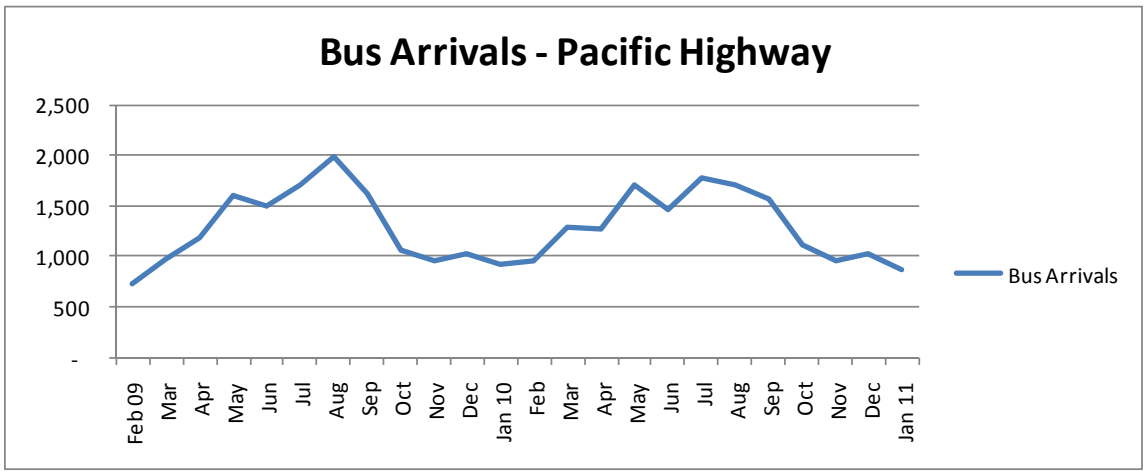

Figure 6 – US Inbound Bus Crossings at Pacific Highway

At Pacific Highway, bus arrivals have been relatively flat over the last two years. From 2009 to 2010, total bus crossings increased by 3%, however traffic during the peak season (May through June) declined by 2%.

4.2.2. *Canadian Inbound*

Facilities

Buses currently share an approach lane with NEXUS travellers. According to the port, heavy NEXUS traffic and the flow of traffic near the duty free store may affect wait times for buses to reach the processing facility. Additional signage will be added in the approach lane and plaza to facilitate directions for buses to reach the proper preprimary inspection access lane for processing.

The approach lanes leading to the plaza are bordered by a grassy knoll that separates the American approach from the Canadian approach. The large grassy knoll is located there primarily for aesthetic purposes, which limits the available space for vehicle lanes. CBSA recommended expanding lane capacity by reducing or restructuring the grassy knoll or building a separate bus lane on the opposite side of the duty free store to eliminate bus and NEXUS congestion in the port approach and primary plaza. No formal plans are in place to pursue these infrastructure changes as of yet.

Operations

May through September is the peak crossing period for all bus types. Throughout the year, scheduled buses cross the border up to three times a day and are generally the most time consuming service type for CBSA at Pacific Highway.

In an effort to expedite inspections, CBSA implemented the use of manifests in conjunction with bus operators with varying levels of success. Bus operators often provided CBSA with incomplete and/or incorrect passenger information. Despite the marginal level of success using a manifest, CBSA is open to using the program, and at a minimum, obtaining regular bus schedules and passenger lists.

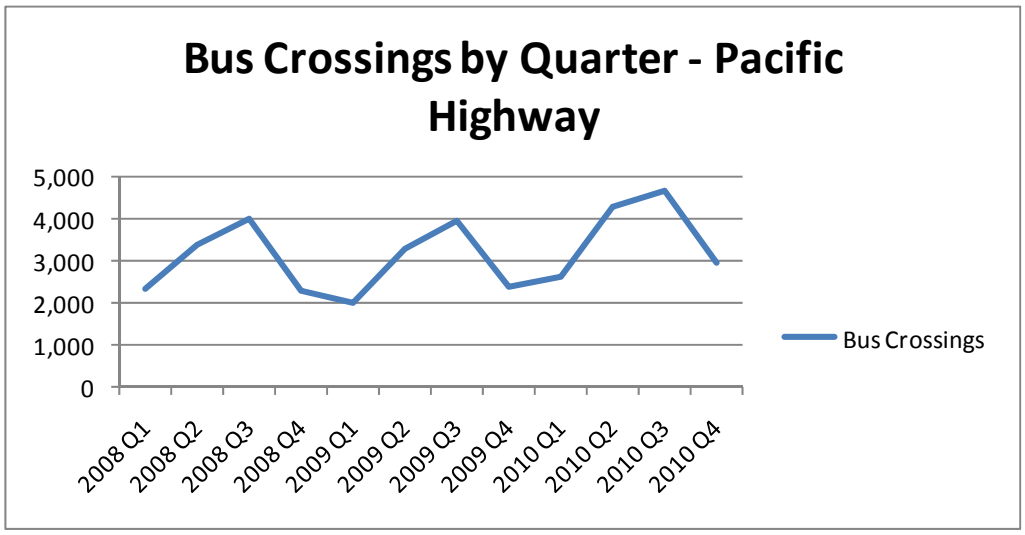

Figure 7 – Canadian Inbound Bus Crossings at Pacific Highway

When evaluating peak Canadian inbound bus crossing data, year to year, the second 2nd and 3rd quarters were identified as peak travel periods. Total bus crossings showed a significant increase in 2010 over the peak periods for 2008 and 2009. When compared to 2009, crossing levels in 2010 increased by 18%.

4.3. Detroit-Windsor Tunnel Crossing

The Detroit-Windsor Tunnel Port of Entry is located between Detroit, Michigan and Windsor, Ontario and connects the U.S. Interstates to Ontario's Highway 401 and is owned and maintained by the Detroit & Canada Tunnel Corporation (Tunnel Authority). The Tunnel is approximately one mile long and at its lowest point is 23 meters (75 feet) below the river surface. On the U.S. side, the tunnel is located in a dense, urban area between the Detroit River and Jefferson Avenue in downtown Detroit, Michigan. A three-phase project to expand Highway 401 between Windsor and Tilbury (46 km) from four to six lanes has been completed. This section of Highway 401 is s a crucial route for traffic between Ontario and Michigan.

Figure 8 – US/Canadian Border at Detroit-Windsor Tunnel

4.3.1. *US Inbound*

Facilities

The Detroit/Windsor Tunnel has two narrow southbound lanes as vehicles travel through the tunnel. Given the infrastructure, buses cannot directly access the bus lane at the port, particularly when passenger vehicles and commercial queues have large buildups. Bottlenecks form at the mouth of the tunnel as trucks, buses, and cars all proceed out of the tunnel and enter the plaza of the port to access inspection lanes.

Currently, the port does not have a separate bus processing terminal. Bus travellers are commingled and processed in the permit/immigration area, which can create significant processing queues and excessive delays for buses.

The tunnel is undergoing major renovations and is currently in the second stage of construction which will produce a new bus processing facility in 2012.

Operations

The most common bus that CBP processes is the municipal Windsor/Detroit Transit Bus (**Figure** 9), which transports daily commuters every 15 minutes during the day and every 20 minutes after 10:00PM.

Figure 9 – Tunnel Bus

Aside from public transportation, bus traffic at the Detroit/Windsor Tunnel is event driven, particularly by major sports and concerts that occur in the downtown area of Detroit. CBP increases its bus processing staff ahead of major events in order to handle large quantities of buses arriving in a given time frame.

CBP is pursuing the use of the eAPIS manifest program for non-municipal bus travel and the use of portable scanners, which may help expedite inspections.

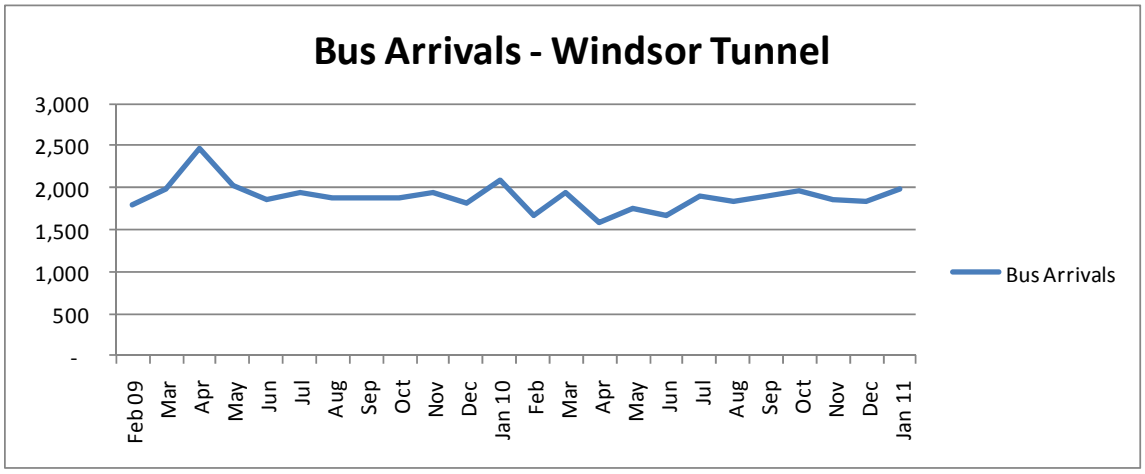

Figure 10 – US Inbound Bus Crossings at Detroit-Windsor Tunnel

There are no clear peak bus travel periods at the Detroit-Windsor Tunnel and therefore only year to year (2009-2010) total crossings were compared. When evaluating February 2009 through January 2010 vs. February 2010 through January 2011, total crossings declined by 7%.

4.3.2. *Canadian Inbound*

Facilities

Similar to the southbound crossing, the tunnel provides limited capacity for northbound throughput. Therefore, buses cannot proceed directly to the port and must queue with all other traffic. As part of the Detroit-Windsor Tunnel Master Plan, CBSA will construct a designated bus processing facility over the course of the next five years.

Operations

Bus volume is steady during the weekdays from 3pm-6pm, when daily commuters return to Canada. The port also processes many buses travelling to the various casinos in Windsor and often sees demand increase in the late morning and early afternoon as buses begin arriving en route to the casinos and experiences heavy bus traffic after events in Detroit. CBSA will increase staff to accommodate bus inspections during periods of high demand. At the Windsor Tunnel, CBSA is pursuing similar procedures for the use of a manifest program and distribution of E-311 cards to bus operators.

The port typically receives prior information from various bus companies. Charter and tour companies fax information regarding the expected number of buses that cross during the week. Transit Windsor operates a Municipal Bus (referred to as Tunnel Bus) seven days a week. They provide CBSA with daily schedules and specific crossing information during major events. Some of the Windsor casinos send CBSA a schedule with the number of charter buses they expect on specific days and in a given week.

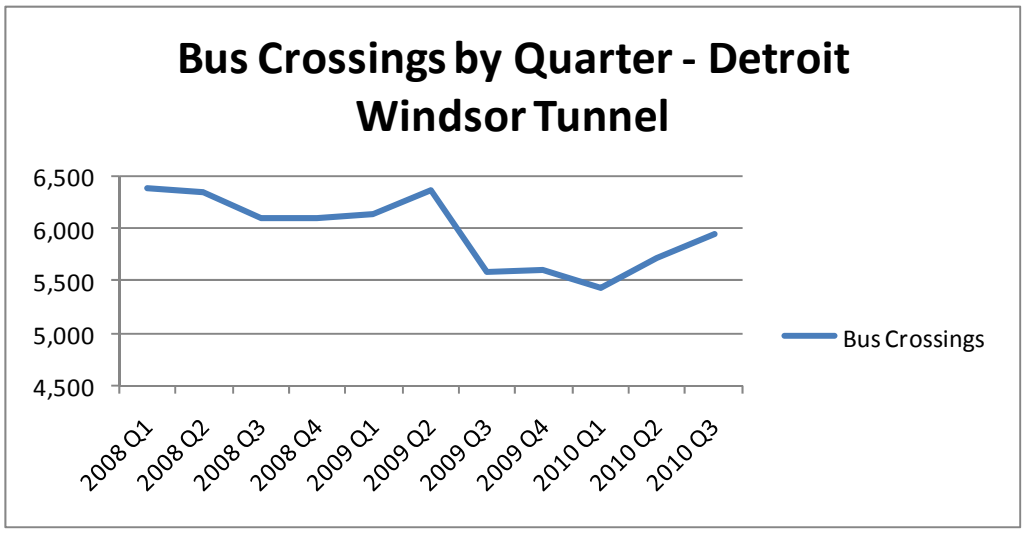

Figure 11 – Canadian Inbound Bus Crossings at Detroit-Windsor Tunnel

When evaluating periods of peak bus crossing demand for Canadian inbound buses, the 2nd and 3rd quarters are identified as peak based on the available data. Total crossings have steadily declined over the course of the last three years. Total crossings during the 2010 peak period were reduced by 6% when compared to 2008.

4.4. Detroit Ambassador Bridge Crossing

The Ambassador Bridge, located approximately 2.5 miles south of downtown Detroit, is owned and maintained by the Detroit International Bridge Company (Bridge Authority) and the Canadian Transit Company. The four-lane bridge provides direct access to and from Interstate 75 and Interstate 96 on the U.S. side and Highway 3 and Highway 401 in Canada. New inspection booths were built in recent years on both sides of the Bridge by the Bridge Authority. A number of projects were recently completed on the Canadian side of the facility to improve traffic flow including intersection improvements and an expansion of Highway 401. On the U.S. side, the Ambassador Bridge Gateway Project has been in progress since the mid-1990s. Currently, Phase 3 and Phase 4 are being constructed which involve modification of I-75 and I-96 highways. In addition to improvements at the Ambassador Bridge, a new crossing is also planned south of the current location known as the Detroit River International Crossing (DRIC). The DRIC is a bi-national project to build a new border crossing in the Windsor-Detroit area as part of the Border Transportation Partnership. The Partnership is comprised of Transport Canada, U.S. Federal Highway Administration, Ontario Ministry of Transportation, and the Michigan Department of Transportation.

Figure 12 – US/Canadian Border at Ambassador Bridge

4.4.1. *US Inbound*

Facilities

The Ambassador Bridge receives the majority of charter buses because of its location along Interstate 96 into the United States. This location is ideal for buses that are bypassing the city of Detroit and continuing on to other major locations in the U.S. However, due to limited infrastructure on the bridge, buses queue with general traffic in the approach lanes prior to reaching the pre-primary inspection area.

At the port, there is no dedicated bus processing terminal. Passengers are processed outside in a vehicle lane next to the primary bus lane. Bus passengers are also subjected to additional processing time because baggage is manually inspected. The port does not possess baggage X-ray equipment.

Operations

In an effort to expedite inspections at the port, Greyhound buses will typically fax the names/date of birth for bus passengers. The port is exploring the use of portable scanners to query bus passengers, which may help reduce inspection times.

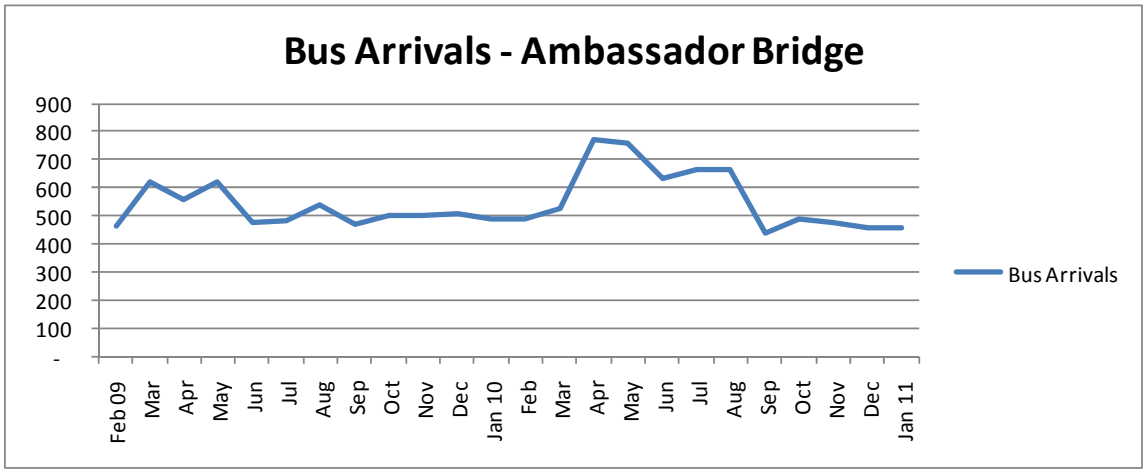

Figure 13 – US Inbound Bus Crossings at Ambassador Bridge

When evaluating periods of peak demand for Canadian inbound bus traffic there was no consistent pattern of peak bus crossings. Annual volume has been declining. If we compare typical peak bus crossing periods, the 2nd and 3rd quarters, total crossings have remained fairly flat over the course of the last three years. While crossings increased slightly in 2009, in 2010 they declined by 10%.

4.4.2. *Canadian Inbound*

Facilities

The pre-primary approach area does not have a dedicated lane for bus traffic. As such, buses can be blocked from reaching the primary facility when general traffic and/or commercial queues are heavy. Plans are moving forward for the addition of a new bridge to be built down river from the Ambassador Bridge.

Operations

The port receives a large number of charter and tour buses headed to Windsor, Ontario casinos and experiences heavy bus traffic after events in Detroit. As many as 40 buses may approach the port at the same time.

CBSA has considered implementing the use of a manifest program, but it is unclear if municipal and charter bus operators can, and will, provide CBSA with a complete and accurate manifest.

CBSA recently began disseminating E-311 cards to bus operators to distribute to passengers to facilitate the declaration process on purchased goods when entering Canada. The E-311 program is still in its infancy and its ability to provide time savings has not been realized as of yet. CBSA believes that as officers, bus operators, and passengers become more familiar with the program, processing times will be reduced.

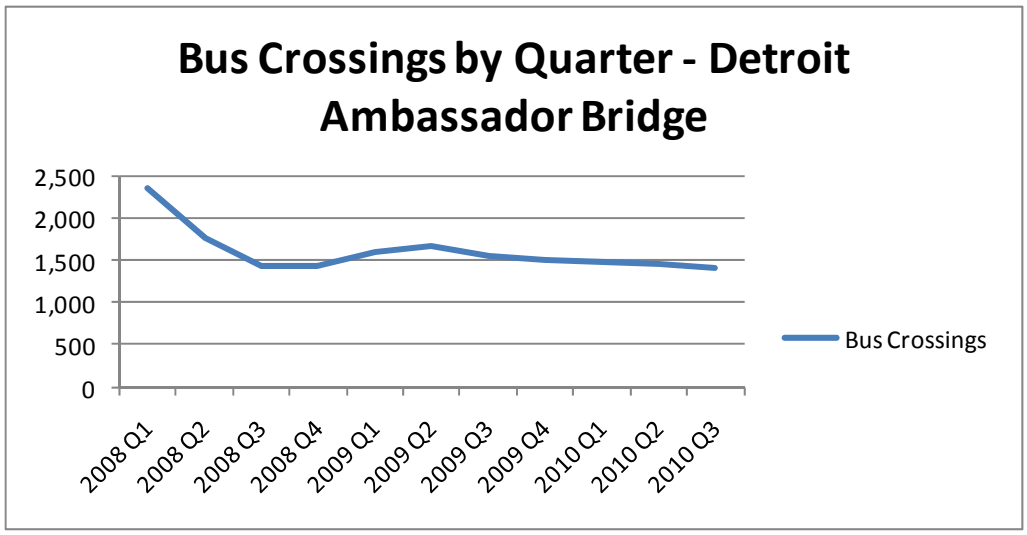

Figure 14 – Canadian Inbound Bus Crossings at Ambassador Bridge

When evaluating periods of peak demand for the 2nd and 3rd quarters, total crossings have remained fairly flat over the course of the last three years. While crossings increased slightly in 2009, in 2010 they declined by 10%.

4.5. Rainbow Bridge Crossing

The Rainbow Bridge connects the tourist districts of Niagara Falls, NY, with Niagara Falls, Ontario Canada. The New York State Department of Transportation designates the bridge as NY 955A, while the Ontario Ministry of Transportation designates the bridge as part of Highway 420. There are two southbound lanes and two northbound lanes. An extensive redesign and reconstruction of the U.S. plaza was completed in 1998 and the Canadian plaza facilities were renewed in 2000.

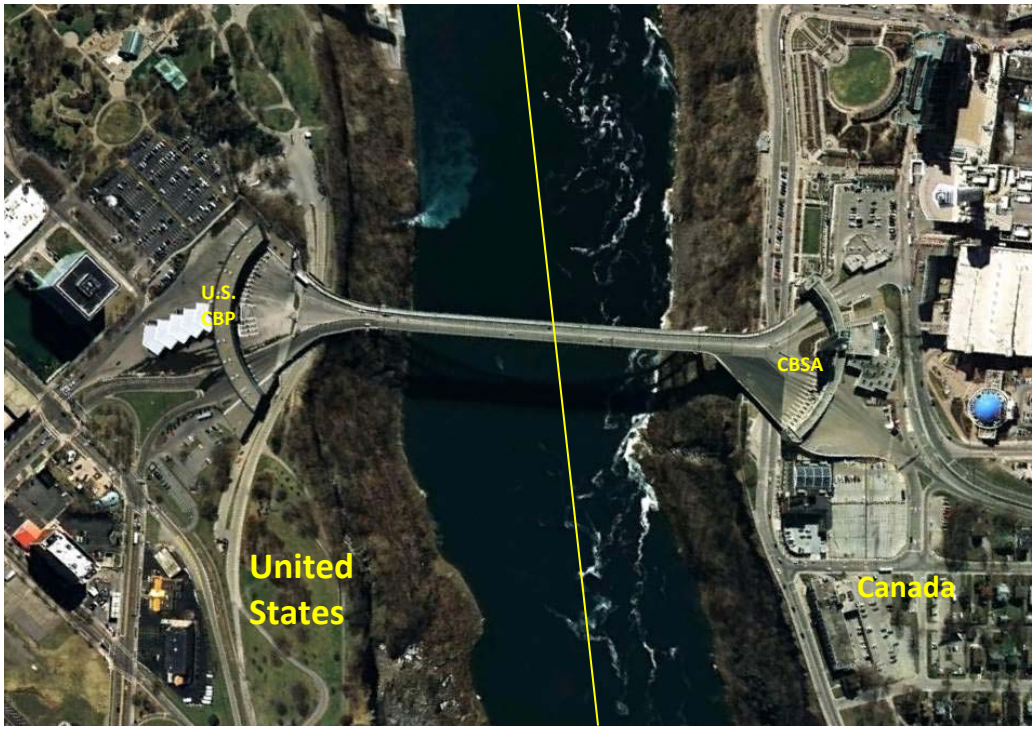

Figure 15 – U.S/Canadian Border at Rainbow Bridge

4.5.1. *US Inbound*

Facilities

Buses queue with general traffic on the bridge and access the far right lane to approach the plaza. At the port, buses queue next to the pedestrian inspection building. The bus lane in the plaza has minimal capacity for buses to queue prior to reaching the inspection area. As a result, bus traffic becomes congested and backs up on the bridge.

The port does not have the proper infrastructure to handle double-decker buses.

Rainbow does not have a separate bus terminal, and there is limited queue space inside the pedestrian inspection building for bus passengers. However, CBP can open up to seven primary workstations to facilitate inspections of bus passengers. CBP is also piloting the use of hand-held technology to expedite inspections.

There is limited space in the post primary inspection area for buses to wait while bus passengers are processed through the facilities. As a result, bus traffic may become congested upon exiting the port.

Operations

Rainbow receives approximately 60 buses a day during the summer months and experiences high volumes on weekends. Bus companies are encouraged to stage their arrivals and use multiple crossings in New York.

The majority of buses arriving at Rainbow are chartered buses and passenger lists are usually organized by tour operators who typically do not have access to the eAPIS system. Some bus companies provide a Microsoft Excel spreadsheet of bus passengers prior to arriving at the port.

Monthly meetings are held with Ontario Motor Coach Association and other stakeholders to obtain advanced notice of bus crossings when possible. CBP adjusts its staffing accordingly.

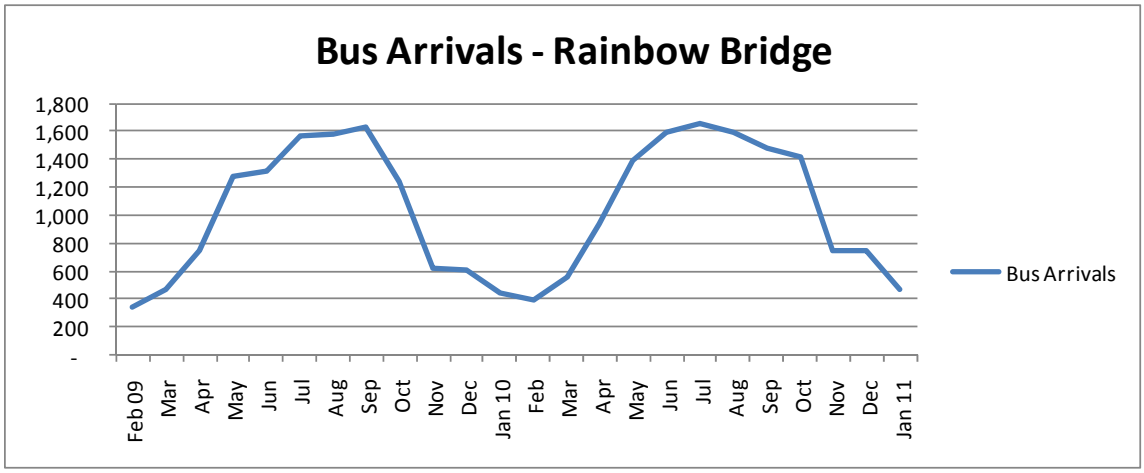

Figure 16 – US Inbound Bus Crossings at Rainbow Bridge

When evaluating peak periods at Rainbow Bridge, June through September represents peak bus crossing traffic at the bridge. Total bus crossings have slightly increased by 3% from 2009 to 2010.

4.5.2. *Canadian Inbound*

Facilities

At the end of the bridge, there is approximately 91 meters (300 feet) for buses to queue before reaching primary. During heavy volume, bus traffic becomes congested and also backs up on the bridge. There is no designated bus terminal and the available space, next to the administration building, is limited to accommodate bus passengers waiting for inspection.

The port's infrastructure contains a small footprint and is designated as a tourist area, which inhibits CBSA from expanding bus operations.

Operations

During the summer months, the port experiences bus volumes, returning to Canada, matching the patterns and volume of those crossing into the US. Additionally, duty free shops often offer incentives to drivers, which influence their choice of crossing regardless of expected wait times. Tour companies offer a "view of Niagara Falls" as part of their package and therefore cross at Rainbow Bridge despite the traffic.

CBSA meets regularly with Ontario Motor Coach Association and other stakeholders and encourages bus companies to stage arrivals across all three bridges. The port is often updated by Greyhound on scheduled arrivals, which helps CBSA staff appropriately.

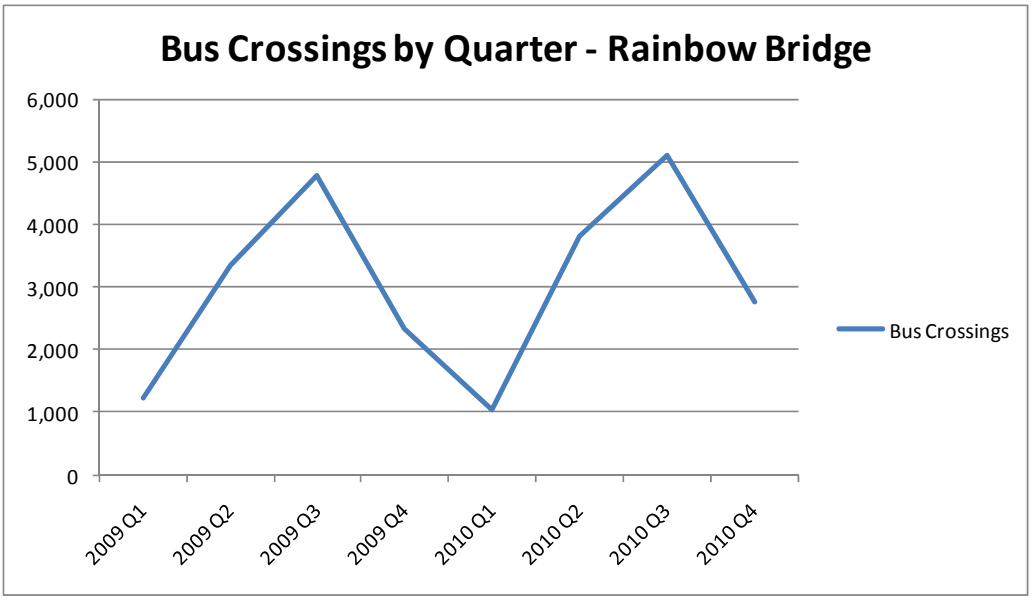

Figure 17 – Canadian Inbound Crossings at Rainbow Bridge

When evaluating periods of peak demand for buses returning to Canada at the Rainbow Bridge, the 2nd and 3rd quarters were determined to be peak. Total crossings increased by 9% from 2009 to 2010 for these peak quarters.

4.6. Queenston-Lewiston Bridge Crossing

The Lewiston–Queenston Bridge is a five lane multi-directional bridge which crosses the Niagara River gorge. It is an international bridge between the United States and Canada connecting Interstate I-90 in the town of Lewiston, New York to Highway 405 in the village of Queenston, Ontario. In 2003, the approach area to the Lewiston Plaza were widened to create additional capacity and for safety purposes in the case of an evacuation on the bridge. Recently, the Niagara Falls Bridge Commission (NFBC) constructed 2 additional primary inspection lanes, a new central administration building for CBSA, and a wall to separate Canada and U.S.-bound traffic on the Queenstown side of the bridge.

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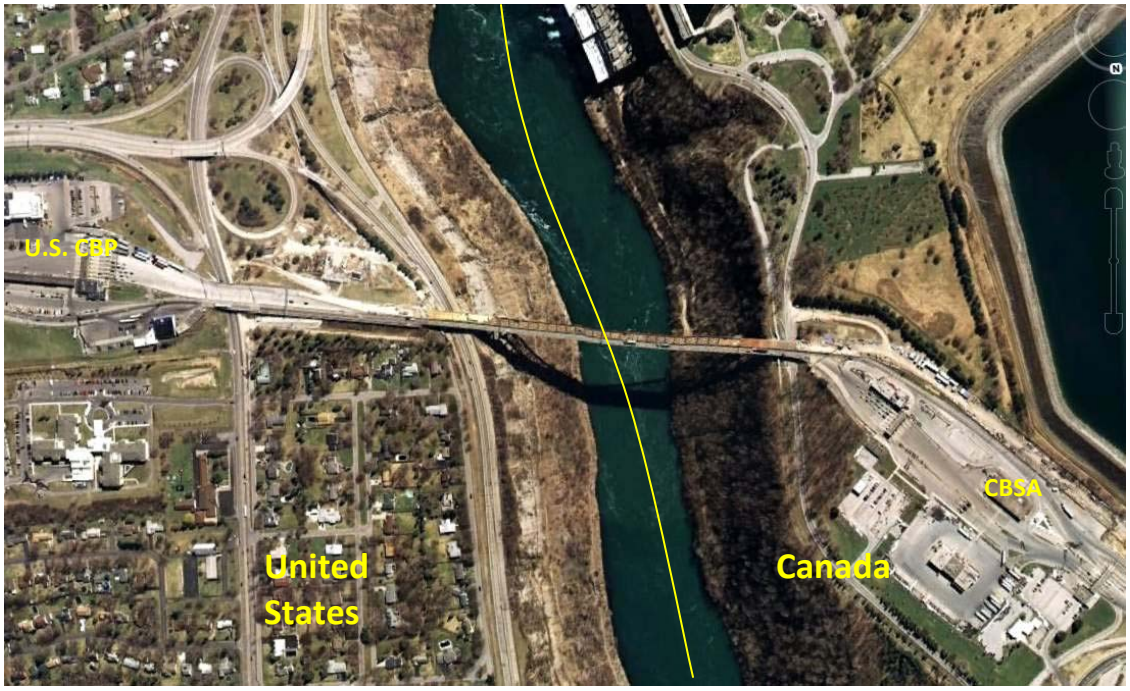

Figure 18 – Canadian-U.S. Border at Queenston-Lewiston Bridge

4.6.1. *US Inbound*

Facilities

There are minimal bus crossings at the Lewiston Bridge, and the port currently does not have the infrastructure or separate facilities to processes buses. Currently the few buses that periodically cross the U.S. border queue with general traffic, and passengers are offloaded and processed in the administration building. Given the minimal bus volume, Lewiston was not included in the study.

However, it should be noted that the new bus processing facility at Queenston may affect southbound bus traffic in the future. The port and the Niagara Falls Bridge Commission are reviewing temporary plans to accommodate a potential increase in bus crossings.

4.6.2. *Canadian Inbound*

Facilities

The bridge authority opens the center lane for either northbound or southbound traffic, depending on traffic flow. Generally, buses travel in the commercial lane to enter Canada but queue in preprimary with general traffic.

The bus processing facility has limited capacity and generally passengers are offloaded in stages since the space is not large enough to handle a full bus load. Passengers queue outside prior to inspection. However, unlike the Canadian border at Niagara Falls, Ontario, there is ample space to house buses.

The bridge commission recently funded the construction of a new "state-of-the art" bus terminal, which will be opened this spring at the CBSA port in Queenston-Lewiston, Ontario. The cost of the project is estimated at $78 million and was funded by the Niagara Falls Bridge Commission and Canada. The objective is to divert bus traffic away from crossing the Rainbow Bridge, which has limited access roads and a small footprint at the port. The Queenston-Lewiston crossing will house individual bays and will enable the port to process multiple buses at a time. Therefore, it is anticipated that processing and inspections will be expedited, as compared to existing operations at Fort Erie and Niagara Falls.

It is imperative that CBSA and the Niagara Falls Bridge Commission coordinate with CBP at the U.S. border in Lewiston, New York since the port does not have the capacity to process significant southbound bus traffic. A temporary bus facility at Lewiston, New York is being considered assuming there are available funds to support it.

Operations

Currently, there is minimal bus traffic entering Canada from Lewiston, New York; but when the new bus terminal opens this year, the Niagara Falls Bridge Commission and CBSA will direct buses to use this crossing as an alternative route. Statistics were not collected for this crossing.

4.7. Buffalo/Fort Erie (Peace Bridge) Crossing

The Peace Bridge is an international bridge between Canada and the U.S. at the east end of Lake Erie and is located approximately 12 miles from Niagara Falls. The bridge connects the City of Buffalo, New York in the U.S. to the town of Fort Erie, Ontario in Canada. It is operated and maintained by the Buffalo and Fort Erie Public Bridge Authority. In July 2007, the Government of Canada and the Buffalo and Fort Eerie Public Bridge Authority relocated and increased the number of primary inspection lanes on the Canadian Plaza, constructed a new Peace Bridge Travellers Operations Building for CBSA, and constructed a new Peace Bridge Authority Administration building. The Canadian plaza configuration resulted in 2 ½ times more plaza space which has improved traffic conditions on the bridge. Additional improvements and expansion plans include the construction of a second bridge and completing significant reconfiguration and expansion of the U.S. plaza which includes construction of a new, four lane companion bridge to the U.S., construction of a new U.S. plaza, and improved interstate connecting roads. The Bridge Authority is now pursuing an alternative design for the new plaza after the last plan was rejected under the U.S. National Environmental Policy Act's Environmental Assessment Process.

Figure 19 – US/Canadian Border at Peace Bridge

4.7.1. *US Inbound*

Facilities

Bridge infrastructure and general traffic prohibits bus traffic from easy access to the port, given there are two southbound access lanes and one lane is occasionally used for northbound traffic as needed.

Buffalo has a separate bus terminal, which allows the port to process two busloads of travellers at a time. There is a parking lot next to the terminal to stage buses while waiting for inspection. The bus passenger building provides an efficient queue space and enables travellers to move through the inspection process in an orderly fashion.

Operations

Approximately 50 buses a day cross the bridge during peak travel. During periods of peak demand, CBP will contact CBSA to request buses be held in Canada to avoid major bottlenecks on the bridge.

CBP holds regular meetings with Ontario Motor Coach Association and other stakeholders to encourage communications and scheduling, particularly during planned sporting events. As a result, the port receives spreadsheets of bus passengers from various bus companies.

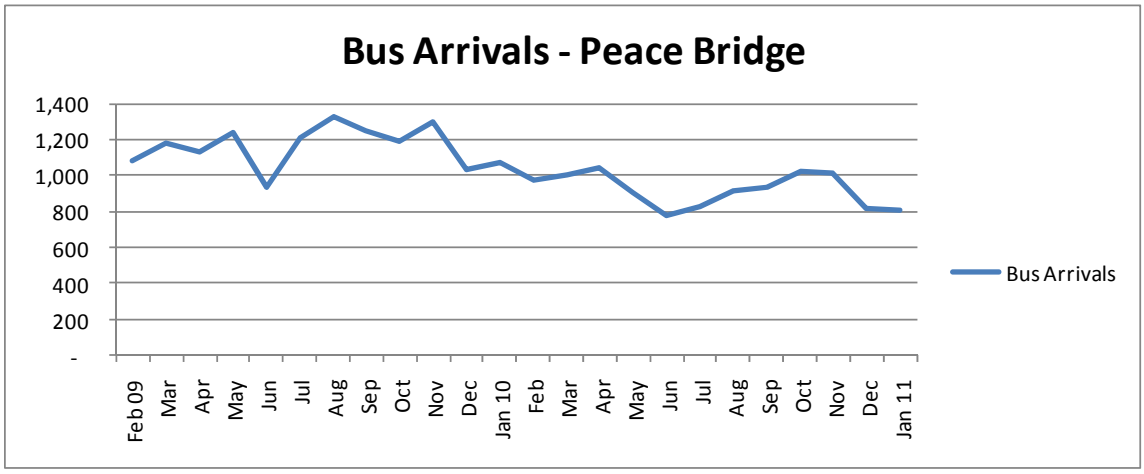

Figure 20 – US Inbound Bus Crossings at Peace Bridge

When evaluating peak periods at Peace Bridge, June through September was determined to be peak. Total bus crossings declined for the peak period, by 27%, from 2009 to 2010. Modified bus counting procedures used by CBP may account for some of the year over year reduction.

4.7.2. *Canadian Inbound*

Facilities

Typically, one northbound lane is available on the bridge to reach the port. During the peak summer months and particularly on days when there are major sporting events, general traffic, including buses, may queue in long lines that span the bridge. The bridge authority will open the middle lane, or "flex" lane on the bridge, when necessary. However, upon exiting the bridge, there is a dedicated bus lane to reach primary. CBSA will also use their commercial lanes to process buses when traffic peaks.

At the port, there is a designated bus processing terminal, but the space and available staffing are limited to inspecting one bus at a time.

Operations

Scheduled buses arrive daily throughout the year and peak volume occurs during the summer months. Other events, such as professional sports, shopping trips and holidays will generate additional bus crossing traffic. According to CBSA, approximately 100 buses will arrive at the port when passengers are returning from the local Buffalo Sabres' and Buffalo Bills' game.

CBSA and the bridge authority will prepare operational plans to accommodate peak bus crossings and special events. In particular, the bridge authority personnel will be stationed in the plaza directly after the bridge and will direct select buses to commercial lanes. CBSA will also increase its staffing to handle the volume of buses.

CBSA meets regularly with the Ontario Bus Association and U.S. bus associations to encourage pre-notification of arrivals and documentation requirements. Bus companies are also being asked to supply E-311 forms for passengers returning to Canada to complete before they arrive at the port.

The eAPIS manifest is being used with a limited number of buses and has been successful to date. The port is interested in expanding this program with as many bus companies as possible.

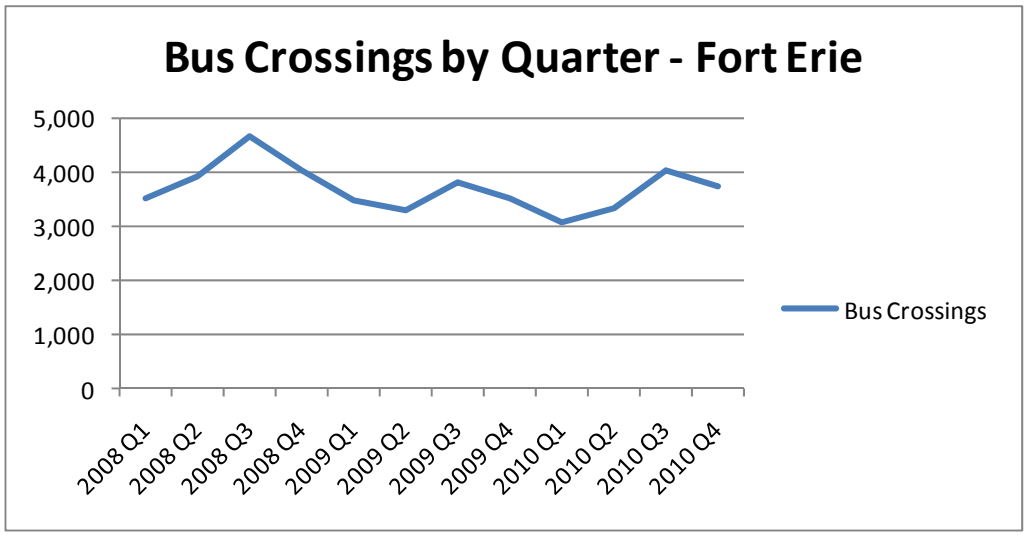

Figure 21 – Canadian Inbound Bus Crossings at Fort Erie

When evaluating year to year peak travel periods for Canadian inbound buses, the 2nd and 3rd quarters are identified as the peak bus crossing periods. Total bus crossings for the peak periods were significantly reduced from 2008 to 2009. A reduction of 17% was encountered over this period with levels slightly rebounding in 2010 increasing by 4%.

4.8. Champlain/Lacolle Crossing

The Champlain port of entry is situated on the international border with Quebec, Canada and is located on Interstate 87 (U.S.) and A-15 (Canada), which is a major north-south highway that begins at the Canada-United States border. Since 2004/2005, the U.S. General Services Administration has completed all three phases of a multi-year/multi-phase renovation of the Champlain POE. Included are the construction of a new port, new access ramps, and new port roadways. In Canada, a traffic management system was installed on the last 8 kms of A-15 south in Lacolle that detects congestion and provides users with real time wait time information through Variable Message Signs (VMS). In February 2008, the Canadian Government committed to fund the expansion of the facilities at the Lacolle POE. The project will include the expansion of the bus processing facilities and is intended to enhance safety and reduce traffic congestion.

Figure 22 – US/Canadian Border at Champlain/Lacolle

4.8.1. *US Inbound*

Facilities

There are three access lanes and a FAST lane for commercial vehicles prior to reaching the plaza at the port. Charter buses are entitled to use the FAST lane to expedite processing when they inform the port in advance of their approximate arrival time. A CBP Officer will divert bus traffic from the access lanes to the cargo area, provided the bus has informed the port of their arrival and has provided a list of passengers on the bus. The Champlain port has extensive vehicle capacity in the commercial inspections area and often uses this capacity to relieve congestion in the passenger and bus inspection operations area. There is limited queuing space inside the inspection building to accommodate bus passengers.

Operations

The Champlain POE inspects up to 200 buses throughout the Easter holiday and up to 100 buses a day in the summer. During peak travel periods, most buses arrive at the same time creating bottlenecks in the access lanes. CBP routinely meets with tour operators to obtain bus schedules and encourages staggered arrival times. The port attempts to staff according to anticipated peak arrival times.

As part of the admissibility process, baggage is inspected. However, bags are manually searched since the port does not have access to baggage X-ray equipment, which increases overall inspection time at the port. Greyhound does not always tag baggage, which results in additional time for baggage inspection.

The port encourages charter buses to transport international travellers separately from U.S. and Canadian travellers to avoid possible immigration issues, which may further delay overall inspection time.

In an effort to facilitate processing, many tour operators fax a list of bus passengers. This list includes passenger passport information. A Manifest Program and hand held technology is being piloted to expedite bus passenger processing.

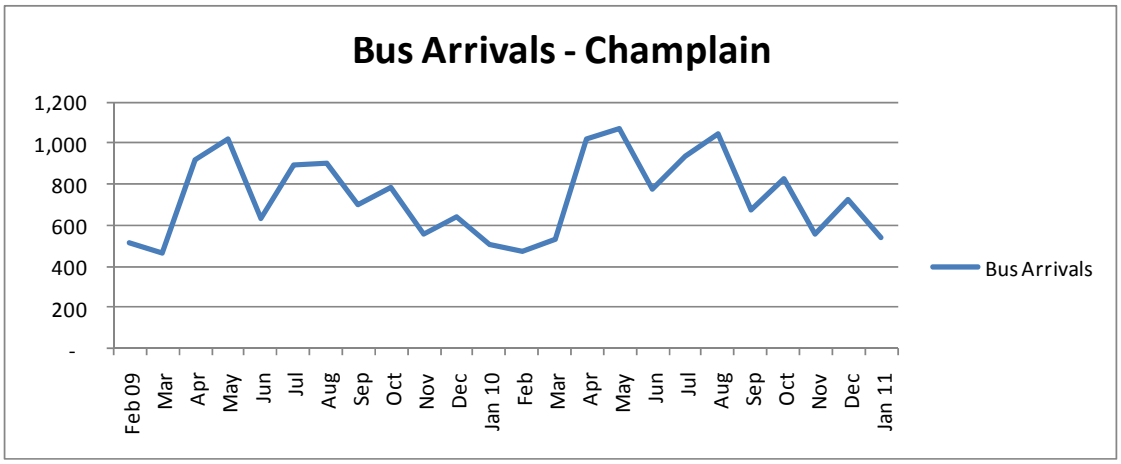

Figure 23 – US Inbound Bus Crossings at Champlain

When evaluating peak bus crossing periods at Champlain, June through August was identified as the period of peak demand. Total bus crossings were reduced by 5% from 2009 to 2010 for the peak period.

4.8.2. *Canadian Inbound*

Facilities

Buses use the far right lane of the two access roads from Highway 87. There is an approximate ¼ mile stretch of road for buses to bypass general traffic to approach preprimary, which minimizes bottlenecks near the port. The port has the option of directing buses to the commercial area for processing when warranted.

Operations

The peak volume of buses is similar to the border crossing in Champlain, New York. However, the port does not receive any pre-notification of bus arrivals or list/manifest of travellers.

Unlike policy and procedures for some bus companies at other ports, scheduled buses are not required to wait for passengers that are referred to secondary. The bus company will provide local transportation for the passenger if necessary.

Bus passengers are processed in a designated area, and there are long-term plans to construct a new facility.

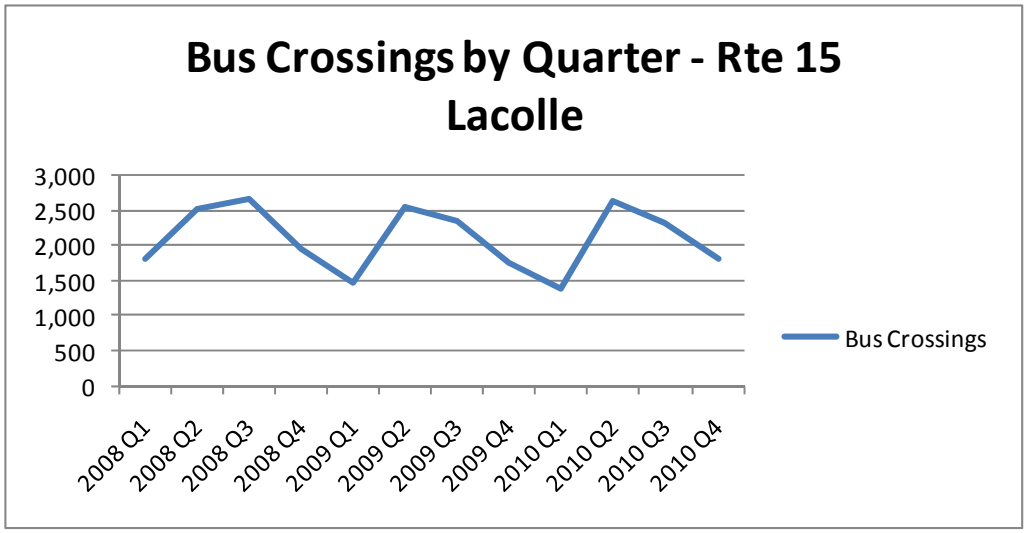

Figure 24 – Canadian Inbound Bus Crossings at Lacolle

When evaluating peak travel times for Canadian inbound bus crossings, the 2nd and 3rd quarters are identified as the periods of peak demand. Total bus crossings have remained relatively flat year to year for these peak crossing periods with a slight 5% reduction in 2009 and a 4% reduction in 2010 when compared to 2008.

4.9. Opportunities for Improvements for All Agencies

Off Site Inspections

Considering many of the ports do not have adequate space to house a designated, full service bus facility, the feasibility of establishing bus facilities off site to perform inspections should be evaluated. During interviews, it was suggested that the state and/or private sector should be enlisted to possibly fund the cost, or a portion thereof, of any new facilities.

The U.S. government has for many years' satisfactorily pre-cleared passengers flying to the United States from Canadian ports without any known threats to public safety[21]. Canada and the United States have expanded a number of joint customs and immigration preclearance programs at both the perimeter and land border over the last 5 years. This recommendation will depend on government rules and regulations regarding jurisdiction and feasibility of funding to support staffing and availability.

[21] Hart, Michael. A Matter of Trust: Expanding the Preclearance of Commerce between Canada and the United States: C.D. Howe Institute, No. 309, 10 September 2009.

An effort was undertaken to relocate the Buffalo U.S. Customs facility to the Canadian side of the Peace Bridge in order to reduce congestion in 2007. The plan ultimately failed because the Canadian government could not accommodate all US requirements for co-location on the Fort-Erie side of the bridge. Despite its failure, this is the type of initiative that would have reduced the type of pre-primary congestion associated with wait times for buses. It should be noted that preclearance is in effect in Vancouver, Canada to pre-clear passengers disembarking from cruise ships and returning to the U.S.

These types of preclearance programs have been successfully implemented by the European Union over the last decade. A physical location at a point away from the border in a secure area would be ideal and remove much of the congestion that occurs on bridges and narrow approaches.

Use of Alternative Access Lanes

Some ports should evaluate the use of commercial, FAST and/or NEXUS lanes to access the port, particularly for buses that are scheduled and/or in need of meeting timeframes for pre-approved events or connecting other modes of transportation. Any such policy would require additional feasibility analyses to ensure that commercial and trusted traveller programs are not adversely affected.

Scheduling

Given the limited capacity to access roads and bus processing facilities at most ports, policies and procedures for bus companies should be implemented to pre-schedule their departure time and destination crossing, via a national web based software system, as previously mentioned. Therefore, buses could be staged at specific geographic crossings throughout the day/week to avoid traffic congestion and simultaneous crossings.

It may be advantageous to research the model utilized by the airline industry, under the auspices of the Federal Aviation Administration.

Provide Up-to-date Border Wait Times

While CBP and CBSA routinely update, publish and disseminate wait times, via their websites, the specific wait times for POV, buses, and commercial traffic should be clearly noted. Currently at some ports, buses have the option of using alternative lanes, which may result in different wait times as compared to general traffic. Other Internet sites such as transportation authorities and real-time technology, such as Bluetooth Technology, should be deployed so that bus companies are informed and can educate their customers on estimated arrival times at U.S. and Canadian port crossings. Also, variable message signs, informing all travellers of estimated wait times, should be posted at strategic points on the highways and bridges approaching the border crossing facilities.

Currently, the Niagara International Transportation Technology Coalition (NITTEC) works together with the southbound/northbound border crossings at Rainbow Bridge/Lewiston-Queenston Bridge and Peace Bridge to assess border wait times and disseminate information to travellers. Additionally, NITTEC has positioned variable message signs at strategic interstate points so that traveller's are informed of traffic patterns and aware of alternative routes.

Inspections

CBP and CBSA should encourage and/or mandate that bus companies/tour operators use the eAPIS and/or passengers use a preapproved electronic ticketing system, similar to rail and air mode requirements. It may be necessary to perform a cost/benefit analysis prior to implementing such a program. However, it should be noted that eAPIS has successfully been implemented by CBP and bus companies at a few southern borders in the United States. While advanced passenger information will enable ports to prescreen biographical data, it will not replace the official presentation of documentation and face-to-face inspection process.

Bus drivers should be prescreened and voluntarily enrolled in the Free and Secure Trade (FAST) program, which is the same program for commercial truck drivers.[22] This policy is currently not in affect but it may be worthwhile to consider and promote to bus companies to help reduce/eliminate driver risk at the ports.

Policies and procedures should be standardized so that scheduled and chartered buses are processed in a routine manner.

Adapt Technology

Ports should investigate the use of hand-held technology to easily inspect bus passengers' documents, as an alternative to queuing in a line inside an inspection area waiting for a primary workstation to open. However, the price of wireless technology must be evaluated and prioritized relative to other port expenditures, and it is of utmost importance that any wireless system meets the port's data security requirements. CBP has recently piloted the use of portable handheld technologies with bus passengers as part of what is referred to as the ATS-M program. The portable devices allow officers to scan documents and query passengers remotely. The program is being piloted in Blaine, WA, Port Huron, MI, and Buffalo, NY.

All ports should contain the necessary equipment to X-ray bags and buses to expedite processing. At a minimum automated baggage X-ray scanners, ideally a real time scanner, similar to the Z Portal scanner used by U.S. CBP officers in San Ysidro. There it is used to scan the complete vehicle with driver and passenger aboard. A solution that allows for focused scanning of the luggage section of a bus would further eliminate any risk of radiation exposure.

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[22] The Free and Secure Trade (FAST) program is a joint initiative between the Canada Border Services Agency (CBSA) and U.S. Customs and Border Protection (CPB). It enhances border and trade chain security by ensuring compliance through certification and, in return, makes cross-border commercial shipments simpler and subject to fewer delays. http://www.ecustoms.com

Enhance Public Relations

CBP and CBSA should continue to work closely with bus companies to ensure that passengers are aware and educated about the policies and procedures for crossing the borders. In conjunction with custom border agencies, it may be advantageous for bus companies to distribute handouts, or publish via their website, port policies when passengers purchase tickets to manage expectations and minimize anxiety.

5. Conclusion

The Canadian-U.S. border stretches 8,891 km and provides numerous points of entry for bi-national bus transportation. Importantly, the majority of annual bus crossings take place at the five major land borders (seven crossings) evaluated which makes a thorough understanding of each crossing's challenges and potential improvements critical to the future of bus transportation and has serious long-term implications for the Canadian and U.S. economies.

In Canada, the bus industry generated over $11.4 billion dollars in 2008, and considering the upward trend over the last decade, revenues can be expected to increase similarly in the years ahead. However, such growth is not ensured within the cross-border bus services sector, and an increasingly 'thick' border would put significant downward pressure on annual revenue for bus services. Addressing the challenges that exist at the border and within the bus industry itself will help maintain a functional and profitable cross-border bus services sector.

Reducing impediments to cross-border travel and increasing ridership also strengthens Canada's commitment to sustainable transportation by reducing automotive emissions. By minimizing the number of cars in circulation, high occupancy bus travel has the potential for major carbon emission reductions over the long-term. As growing demand for oil continues to push fuel prices upwards and social-environmental concerns remain important to consumers and governments, bus transportation will play an integral role in meeting sustainability objectives.

Recent international events and market forecasts show fuel prices on an increasingly upward trajectory. For commuters who use bus transportation and for the scheduled services industry in particular, the rise in fuel prices will encourage bus travel. The incremental increase in bus fares related to fuel costs is typically less than the same cost when driving a car with the same increase. For the charter and tour industry, rising fuel prices may function as an economic disincentive. In total, rapid and sustained rises in fuel prices have generally increased industry wide revenue, however the level and pace of increase will determine if this trend continues in the future.

In order to remain economically strong, the Canadian-U.S. bus services industry has undergone major changes in order to adapt to an evolving border environment. New security initiatives, port infrastructure, and increased competition for cross-border transit have proven to be serious challenges for industry and will remain so in the coming decade. Such challenges inhibit the efficient movement of buses across the border and reduce industry profitability. Security initiatives remain vital to the core national security interests of both countries and are likely to

remain in place for some time[23]. Infrastructure deficiencies are difficult to address as agencies and governments are constrained by port footprints and capital limitations. While there have been a number of renovations to land borders including the addition of bridges and bus facilities, route obstruction remains a pervasive problem for buses during periods of peak travel demand. In addition, competition from discount airlines is growing and reducing the number of trips once serviced by traditional intercity scheduled companies.

It is likely that the industry will continue to encounter protracted border waits with adverse effects on bus schedules and potential revenue reductions in the aggregate. However, this is not to say that issues pertaining to wait times cannot be proactively mitigated. Indeed there are a number of steps, which if taken in concert among stakeholders, can improve the flow of bus traffic in and around the Canadian-U.S. land borders.

[23] United States Government Accountability Office. Border Security: Enhanced DHS Oversight and Assessment of Interagency Coordination is Needed for Northern Border, GAO-11-97, 2010 December

5.1. Challenges to Bus Services (Summary)

Table 6 – Bus Services Challenges Summary

Challenge	Description
Port Infrastructure	The road and bus facility infrastructure at ports spanning the entire Canadian-U.S. border does not allow buses to quickly and efficiently reach the primary inspection facilities.
Increased Inspection Times	The bus industry complained that they are spending an increasing amount of time at primary inspection and desires more certainty related to the entire border crossing process.
Inflexible Crossing Schedule	Many buses do not have the option of crossing during periods of low demand and must cross based on a schedule or contract requirement.
Absence of Inspection Information Available	Bus operators noted that there is a lack of information regularly disseminated regarding security and inspection procedures.
Document Requirements	Increased document requirements are perceived by the bus industry to discourage border crossing.
Competitive Modes of Transportation	Discount airlines and other forms of cross-border transportation present competitive challenges to the industry.
Absence of Wait Time Information	At most crossings, buses do not have access to current and accurate wait times for buses in particular.
Privacy Concerns	Due to privacy concerns on behalf of the bus service industry, many operators are unwilling to collect and distribute passenger identification information to border agencies for prescreening purposes.

5.2. Opportunities for Improvement for Bus Services (Summary)

Table 7 – Bus Services Opportunities Summary

Opportunity	Description
Reservation System	Creation of a system that would allow buses to reserve a time at primary inspection through the use of a computer application.
Pre - Clearance	Creation of a preclearance program that facilitates the ability of regular bus operators and passengers to reduce time spent at the border by being cleared prior to crossing.
Manifest Transponder	Bus operators and border agencies should consider the use of an electronic transponder that would possess passenger and operator information and be read when a bus arrives at a land border.
Increased Engagement with Border Agencies	Bus companies should increase efforts to participate in meetings and other events with border agencies. Bus companies should increase general communication with border agencies on a daily and weekly basis, alerting them of expected number of crossings and arrival times
Utilize CBSA (E-311) and CBP Declaration Form (6059B)	Bus operators should regularly disseminate Canadian E-311 and CBP Declaration Forms when traveling across the border. These forms will reduce the declaration process.

In response to events and increasing threat assessments made by the Canadian and American Governments, border agencies have 'hardened' inspection procedures and port infrastructure over the last decade. These and other operational changes were government mandated initiatives intended to meet mandated security objectives. In conjunction with these changes, both countries also implemented new programs and technologies aimed at reducing their impact. In addition to issues related to security initiatives, which receive the majority of external critiques, there are a number of other variables that impact border agencies' ability to better facilitate bus transportation. These variables are largely not under the control of the respective agencies and include issues such as road infrastructure, peak travel periods, and financial resources.

5.3. Challenges for Border Agencies (Summary)

Table 8 - Border Agencies Challenges Summary	
Opportunity	**Description**
Limited Road Infrastructure	Ports are constrained by limited road infrastructure and access lanes which enable buses to proceed directly to the port. Many crossings are limited by bridges, tunnels or other infrastructure configuration that is difficult to expand or modify to adapt to high demand.
Bus Processing Facilities	Many ports lack adequate bus processing facilities and/or the capacity to efficiently handle full bus loads of passengers as they arrive at the port. A majority of ports are only equipped to process one bus at a time.
Arrivals	Bus operators and border agencies should consider the use of an electronic transponder that would possess passenger and operator information and be read when a bus arrived at a land border.
Staffing	Most ports do not have sufficient staffing to handle a large influx of buses that cross during peak times of the year.
E-311	In Canada, travellers are required to declare goods purchased in the U.S. and pay taxes at the port. This procedure is a time consuming, mandatory policy and results in additional processing time for bus passengers.

5.4. Opportunities for Improvement for Border Agencies (Summary)

Table 9 - Border Agencies Opportunities Summary

Opportunity	Description
Pre - Clearance	Evaluate feasibility of establishing bus facilities or other off site facilities to perform inspections.
Alternative Access Lanes	Evaluate the use of allowing buses to use the approach lanes currently dedicated to commercial FAST and/or NEXUS lanes to access the port. Any such policy would require additional feasibility analyses to ensure that commercial and trusted traveller programs are not adversely affected.
Reservation System	Working in conjunction with bus companies, border agencies should consider development of an application that schedules bus arrivals at the port.
Inspection Policy	Border agencies should encourage and/or mandate that bus companies use the eAPIS system and consider adoption of a pre-approved passenger electronic ticketing system similar to rail and air mode requirements. In addition, bus drivers should be prescreened and voluntarily enrolled in the FAST program. Finally, policies and procedures should be standardized so that scheduled and chartered buses are processed in a routine manner.
Adapt Technology	Ports should be furnished with hand-held technology to easily inspect bus passengers' documents, as an alternative to waiting in line to access traditional primary workstations.

Many of the opportunities for improvements have overlap in both the bus services and border agencies sections as they would need to be coordinated and eventually implemented in concert. All of the opportunities discussed have the potential to improve the border crossing process though none were given precedence over another. Given the time and economic constraints of this analysis, a detailed feasibility evaluation of the individual solutions, which could have examined cost and benefits, was not completed. Rather, this study attempted to highlight the potential challenges and opportunities identified for improvement and organize them such that they could be analyzed in greater detail in subsequent evaluations.

6. Appendix

6.1. Stakeholder Contact List

Canadian Stakeholder Contact List			
Organization	**Description**	**Contact Name**	**Title**
Motor Coach Canada	To provide a united voice at the national level for motor coach tour operators and bus operators and to create an environment that supports members' investment and growth. (Predominantly charter operators).	Brian Crow	President
Canadian Bus Association	The voice of the bus industry in Canada at the federal level. (Only four members: Greyhound, Orleans, Ontario Northland, Saskatchewan Transportation).	Mark Resnick	Executive Director
Ontario Motor Coach Association	OMCA (The Ontario Motor Coach Association) is one of the largest travel and tourism-related associations in Canada, and the voice of private sector bus operators, inter-city bus lines, charter and coach tour companies in Ontario. (almost all commercial players, both charter and intercity).	Brian Crow	President & CEO
Greyhound Canada	Major Canadian intercity scheduled service	Stuart Kendrick	Senior Vice President
Canada Border Services Agency (CBSA)	Canada Border Services Agency	Jim Bissett	CBSA Headquarters, Ottawa
	Lacolle (Champlain) Border Crossing	Claire Jacques	Director, Montérégie Border District
	Niagara Region Border Crossings	Dave Berardi	Director, Niagara Falls District
	Fort Erie (Buffalo) Border Crossing	Neil Mooney	Director, Fort Eerie District
	Windsor (Detroit) Region Crossings	David McRae	Director, Ambassador Bridge District
	Pacific Highway / Douglas (Blaine / Peace Arch) Region Border Crossings	Kim Scoville	Director, Pacific Highway District
Public Border Operators Association	Represents border operators of bridges and tunnels between Canada and the U.S. in Canada. Can connect you with all the bridge managers. (Ontario/NY/Michigan crossings perspective)	Chris Bonn	Admin Supervisor, Buffalo and Fort Erie Public Bridge Authority

U.S. Stakeholder Contact List

Organization	Description	Contact Name	Title
American Bus Association	Represents almost 900 motorcoach and tour operators in the United States and Canada.	Peter Pantusso	President
United Motorcoach Association	North America's largest association of professional bus and motorcoach companies.	Vic Parra	President
Amtrak	Operates passenger buses and trains in the U.S. and across the border	Ed Courtemanche	Senior Principal - Operations / Service Planning
Customs and Border Protection (CBP)	CBP Headquarters	James Pattan	Program Manager, Land Border Integration PMO, CBP
	Lacolle (Champlain) Border Crossing	Steve Bronson	Assistant Port Director
	Niagara Region Border Crossings	Timothy Andrews	Chief CBP Officer
	Fort Erie (Buffalo) Border Crossing	Mark MacVittie	Acting Border Security Coordinator, Buffalo Field Office
	Windsor (Detroit) Region Crossings	Dawn Miller	Operations Specialist
	Pacific Highway / Douglas (Blaine / Peace Arch) Region Border Crossings	Jonni Galarza	Chief CBP Officer
Whatcom Council of Governments	A county in Washington State that is heavily involved in cross-border transportation issues. Also a member of the Transportation Border Working Group. Focused on Washington - British Columbia border.	Melissa Miller	Project Manager
Bi-National Tourism Alliance	Provide the platform for U.S. and Canadian businesses and organizations to work collaboratively on cross-border economic and tourism development initiatives,	Arlene White	Executive Director
Niagara Falls Bridge Commission (U.S. and Canadian representation)	Manages and operates the Rainbow Bridge, Whirlpool Bridge and Queenston-Lewiston Bridge.	Lee Holloway	General Manager
Border Policy Research Institute (Western Washington University)	Focused on Canada-U.S. border research with expertise in the border between Washington State and British Columbia	David Davidson	Project Director

6.2. Border Agency Questionnaire

General Overview

- Please describe the volume of bus traffic at your POE.
  - Does it vary by season?
  - Please describe volume by time of day, week etc?
  - Do you staff bus processing according to peak travel times?
  - Do you monitor and analyze bus traffic for trends, notable statistics, effect of initiatives etc?
  - Do you have any statistics on monthly volume of bus crossings for the past 3 years? If so, is it possible to provide this information?

- Who is responsible for processing buses at your POE?
  - How are bus processing duties allocated?
  - How are bus processing duties prioritized?

- Have there been any (non-security) changes to bus processing policy over the last two years?
  - New initiatives implemented?

Bus Processing

Facilities

- Please describe the way in which buses approach the POE.
  - Is there a dedicated lane for buses in the approach?
  - How many approach lanes are there for all traffic prior to reaching the plaza?
  - Do buses queue with other types of traffic? If so, which types of traffic?
  - Are there any infrastructure constraints, which could create a bottleneck prior to the reaching pre-primary?
  - Does the presence of a duty free store affect the flow of bus traffic?

- Once buses reach the inspection plaza, please describe the queuing configuration.
  - Are buses separated from other types of traffic?
  - Are officers, bridge personnel, or others used to direct bus traffic within the plaza? How is the area supervised?

- Describe the primary bus processing facility at the port.
    - Are there any facility challenges or constraints for buses?

- Have there been any changes to infrastructure that would have an effect on buses?
    - Any future infrastructure plans?

Operations

- What are the procedures for inspection of bus travellers?
    - Are buses processed any differently depending on bus type (scheduled, charter, tour etc)?
    - Does the port use a Manifest program? If so, what percentage of buses participate in the program?
    - Does the port use a hand-held device to perform inspections?
    - Are travellers offloaded to be inspected once they reach the inspection facility? If so, please describe the process of offloading bus passengers (if required)? Distinguish by bus type.
        - How are bus travellers processed once inside the inspection facility? Please respond by bus type.
    - Are bus passengers given any kind of priority over other travellers?
    - Is baggage x-rayed?
    - Does the port use a Mobile- VACIS system to x-ray the buses?
    - How are secondary referrals handled?

- Does an officer perform a physical inspection of the bus?

- Please describe what happens to travellers once they have been processed.
    - Do travellers immediately board the bus?
    - How much time do you estimate it takes to complete a bus inspection?

Post Primary Facilities

- Once the bus is ready to leave the inspection facility, is it able to immediately exit?

- Are there additional security checks or hardening devices that inhibit an exit?
  - Are any federal (FMCSA) or provincial motor carrier safety enforcement on-site to inspect buses?
- Does traffic have to merge with other types of traffic as it exits?
- Any infrastructure bottlenecks?

Agency Coordination and Outreach

- Please describe the type of communication the agency has with stakeholders such as bridge operators, bus companies, and transportation agencies?
  - Does the agency coordinate with any entities in preparation for periods of high demand?
  - Does the agency have regular meetings with stakeholders to discuss issues of concern?

- Does the agency disseminate bus travel times or any other information that may reduce border congestion?
  - What type of outreach does the agency perform in order to reduce bus congestion?

- Has the agency implemented any new initiatives designed to improve bus processing?
  - New technologies?
  - New rules or regulations?
  - Document additions?

- Do you have any other recommendations for improving cross border bus travel? Note that these recommendations can be targeted at bus companies, agency itself, or other stakeholders.

- Are there any specific things that you think bus companies could do to make it easier for your border agency to do their work? (follow-up question, if not much is provided regarding the bus companies themselves)

- Do you have any other stakeholders that you would recommend we speak to regarding the topic of cross-border passenger bus travel?
-

6.3. Bus and Tourist Associations/ MPOs Questionnaire

General Organizational Information

- Where is your organization located?
  - What geographic territory does it cover?

- Please detail the mission of your organization.

- What is your relationship with the bus companies you represent?
  - Who are the major bus companies by region?
  - How do you work with bus companies to enhance cross border travel? Please detail the extent of your advocacy work.

Cross Border Travel

- How do travellers from Canada impact the economy? How do travellers from the U.S. impact the economy?
  - Is bus travel increasing or decreasing as a means to cross the border. Please explain why.
  - Can you provide us with any relevant studies and/or statistics related to the economics of bus travel within the past five years?

- What types of rules and regulations are bus companies subject to which may impact cross border bus travel?
  - What effect do these regulations have on the flow of travel and/or business?
  - Are there specific steps that your organization takes to minimize or mitigate rules or regulations?

- What specific areas (urban and non-urban), routes, and corridors are particularly busy and present travel challenges related to cross border bus transportation?
  - What is the root of these challenges?
  - How can these challenges be addressed?

- Please describe the policies and procedures for purchasing bus tickets between Canada and the U.S.

- Tell us about the typical experience for bus passengers traveling in both directions?
  - What is the general makeup of bus passengers, i.e. tourists vs. commuters for work?
  - Costs associated with bus travel? Relative to other means of travel?
  - How long is the average trip?
  - How much time is typically spent at the U.S. border for inspections?
  - How much time is typically spent at the Canadian border for inspections?

- What is the extent of your relationship with the U.S. and Canadian border agencies?
  - Do the bus companies communicate with CBP prior to arrival from Canada?
  - Do the bus companies communicate with CBSA prior to arrival from the U.S.?
  - Is there a specific border crossing (either direction) that has been a concern for your bus companies or the bus companies you represent?
  - Do you work together to solve mutually shared issues?

- What issues or challenges do you see for bus travel presented by the border itself?
  - What is your major concern, if any, regarding facilitation for buses and bus passengers when crossing the U.S./Canadian border?
  - Do you have any ideas recommendations or ideas to improve this process?

- Have travellers or bus operators ever expressed safety or security concerns? Please detail.
  - Do you have any recommendations or ideas to improve this process?

- What infrastructure / facilities are used to process buses at the border crossings and do you think they work adequately?

- Are there any specific examples of facility or operational challenges that have had an impact on cross border travel?
  - Can you describe any particular problematic experiences?

- Are there similar case studies in the past which may have applicability to this analysis? For example, can you discuss other facilitation related issues in the past in which you've developed innovative solutions?

- What other issues or concerns do you have regarding cross border bus travel?

- Do you have any other recommendations for improving cross border bus travel? Note that these recommendations can be targeted at bus companies, border agencies, or other stakeholders.

- Do you have any other stakeholders that you would recommend we speak to regarding the topic of cross-border passenger bus travel?

- Do you know of any reports or studies that we should be aware of that might help with understanding the Canadian and U.S. passenger bus industries and the border?