REQUEST FOR THE RATE SCHEDULE AND THE OPERATING RECORD

One number, and three sets of documents

Husker game-day transportation · 49 CFR § 604.8 · October 31 and November 21

To: Elizabeth D. Elliott, Director, Lincoln Transportation and Utilities
Carla M. Cosier, Assistant Director of Transit, StarTran Division
cc: Office of the Mayor · Lincoln City Council
From: Kumar Shah, President & Chief Executive Officer, Pronto Corporation
Date: October 25, 2026

Ms. Elliott, Ms. Cosier,

We received the Mayor's letter of October 23 declining our request under 49 CFR § 604.8. We accept that it is the City's decision to make.

We are writing because the letter declines a rate we never proposed, and because the rate we did propose to use — and have been requesting since September 15, 2026 — has still not been provided to us.

WHAT WE ACTUALLY OFFERED

The Mayor's letter describes "iPronto's offer to pay StarTran costs at the National Transit Database cost of $118 per hour." **We have never proposed $118 per hour, or any other figure.** What we wrote to StarTran on **September 15, 2026**, in the request itself, was:

> *"We would pay StarTran's fully allocated rate for both vehicles and operators, StarTran personnel would drive throughout, and we would carry the insurance, the reservations, the fares and all passenger communication."*

We have held to that in every communication since. On **October 22 at 12:19 PM** we wrote to you both:

> *"We have not yet received the hourly vehicle and staff rate filed with the City and FTA as part of your transit service operation. For our planning purposes, we need these rates asap. We looked for your filing online but were unable to find them. Kindly respond at the earliest as this has been pending for quite some time."*

We have proposed no ceiling and no alternative basis, because the figure is not ours to propose.

WHAT WE ARE ASKING YOU TO PROVIDE

To settle this one way or the other, we are asking for four things. None of them requires the City to reopen its decision.

- **The equipment and driver lease rate schedule.** Under § 604.8 a recipient leasing equipment and drivers to a registered charter provider ordinarily does so from an approved, fully burdened schedule — one that recovers operator wages and benefits, fuel, maintenance, insurance and liability, vehicle depreciation and administrative overhead, so that no part of the cost falls on local taxpayers. **If no such schedule is maintained, we ask instead for the fully burdened hourly rate for a bus and a qualified operator.**
- **The Big Red Express operating records for the past three seasons** — ridership by lot and by game; boardings by hour; hours logged by vehicle and by driver; and vehicles assigned by lot and by game. We first asked for this in August and have received a summary rather than the record.

- **The § 604.12 quarterly filings for that service.** Section 604.12 requires a recipient providing charter service under an exception to retain its charter records for three years and to post them on the FTA charter registration website within thirty days of the end of each calendar quarter, with a statement identifying the exception relied upon. We have looked for the City's filings on the registration website and have not been able to find them.
- **Where any of the above is not maintained, a statement to that effect.** On **August 28** StarTran wrote that it does not "specifically track or have a boarding-per-hour figure for this service," and that it "did not keep time stamps for this service." If that is the position on the rest, we would simply like it on the record, so that the file is complete and nobody is waiting on documents that do not exist.

> **And the one question that settles the commercial side: what is LTU's fully burdened hourly rate for a bus and a qualified operator? Name it and we will pay it.**

If there is a rate at which this lease is cost-neutral to Lincoln, we will meet it without negotiation. If the City's position is that no rate is acceptable, we would ask you to state that, because it is a different answer from the one the Mayor's letter gives and it would settle the matter for everyone.

WHY THE TIMING MATTERS

Our schedules are built departure by departure, and capacity is added to individual departures as supply is confirmed — a StarTran bus would be assigned to a specific route and boarding time exactly as a motorcoach or school bus is, with the additional seats opening for reservation immediately afterwards. We have done this throughout the season, often within hours of an operator confirming a vehicle.

So October 31 is still within reach. What we need is an answer in time to assign vehicles, publish boarding times and open the seats — which is why we have asked the Mayor and the Council for a decision by **10:00 AM Central on Tuesday, October 27.**

Our request remains open for **both** remaining home games, October 31 and November 21, on unchanged terms: StarTran's own operators driving, StarTran's regular service, maintenance, workforce and contingency obligations met first, and the lease limited to whatever is genuinely available after that.

WHAT THIS DOES NOT ASK

We are not asking the City to reopen the decision, we have filed nothing against the City, and we do not intend to. Section 604.8 makes a lease permissible, not mandatory, and we have said so publicly throughout. We make no allegation about the records and draw no conclusion from their absence — we are asking for documents that should exist, and we would be glad to be shown that they do.

Our goal has not changed: to make this service fan-responsive and demand-responsive, and to make it work for Lincoln residents and Husker fans — and we are asking for your help in making it better for all of them.

A written reply is fine; a call is faster, and I will make myself available at any hour that suits you on my mobile, 408.472.5662.

Sincerely,

Kumar

Kumar Shah · President & Chief Executive Officer, Pronto Corporation
kumar@iPronto.com · 650.249.7400 · FTA Charter Registration ID 6643