



U.S. Department
of Transportation
**Federal Transit
Administration**

1200 New Jersey Avenue SE
Washington, D.C. 20590

May 31, 2012

Ben Cupp
Director of Engineering
ARBOC Specialty Vehicles
Middlebury, IN 46510

Dear Mr. Cupp:

This letter responds to your March 12 letter in which you requested assistance from the Federal Transit Administration (FTA) concerning the applicability of the Bus Testing Regulation (49 CFR Part 665) to versions of the ARBOC Mobility Spirit of Mobility bus model built on a standard OEM cutaway chassis in place of the OEM chassis equipped with an air bag suspension as was previously tested. Your March 12 letter specifically states that:

- “ARBOC Specialty Vehicles has in our history submitted for testing three Spirit of Mobility vehicles built on the GM 4500 platform. These vehicles were a 23’ Gasoline tested in July 2008, a 23’ Gasoline Hybrid Electric tested in July 2010, and a 23’ CNG/Hybrid tested in 2010.”
- “All three vehicles ARBOC has tested were within the Spirit of Mobility Family of Products. In October 2010 ARBOC introduced the Spirit of Freedom product line. The Freedom product offering includes frame modifications which are in keeping with modifications made to all Spirit of Mobility Products which again have been tested on three separate occasions at Altoona. This product is intended as our entry level offering into the low floor market place. In order to accomplish this objective, the air suspension normally sold as standard equipment on the Spirit of Mobility has been eliminated.”
- “Our Spirit of Freedom is equipped with a vehicle body identical in design, materials, and construction as the Spirit of Mobility, which has been tested on three occasions. Secondly and most importantly, the Spirit of Freedom utilizes a mass produced chassis with O.E.M. suspension components. Unlike the Spirit of Mobility which has installed as standard equipment, an air suspension system affording a kneel feature, the Freedom product is a fixed suspension vehicle.”
- You are requesting that the Spirit of Freedom be available to FTA grantees without the need for further testing beyond that already performed on the Spirit of Mobility built on several variants of the GM 4500 chassis in the 150,000 mile/5 year service life category.

FTA has reviewed your request and has determined that **no testing** will be required for the Spirit of Freedom bus model. This determination is based on the similarity of the bus body construction with the Spirit of Mobility, the previous Spirit of Mobility testing already performed at Altoona, and that the GM4500 chassis has been tested at Altoona in other bus models.

This determination is based on the changes detailed in your submissions or mentioned above. Should you make any other changes to the vehicle, additional testing may be required. If you require any further assistance with this or other matters concerning bus testing, I encourage you to consult the resources provided at www.fta.dot.gov/bustesting. If you still have questions after checking this website, please feel free to contact me at the address above, or by e-mail (gregory.rymarz@dot.gov), fax (202-366-3765), or telephone (202-366-6410).

Sincerely,

A handwritten signature in black ink, appearing to read 'Gregory Rymarz', written over a printed name.

Gregory Rymarz

Bus Testing Program Manager
Office of Mobility Innovation, TRI-12