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** Also admitted in Rhode Island

May 7, 2003

Honorable Vernon Williams, Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20423

207778

RE: Peter Pan Bus Lines Trust
-Purchase and Acquisition of Control-
Arrow Line Acquisition, LLC, et al.
Surface Transportation Board
Docket MC-F-20995

ENTERED
Office of Proceedings

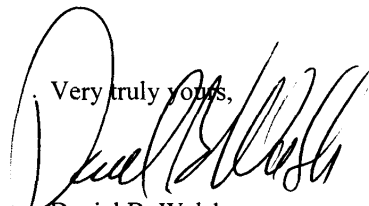
MAY - 9 2003

Part of
Public Record

Dear Secretary Williams:

There are transmitted herewith the original and 10 copies of a affidavit of Michael Curreri regarding the proposed transaction involving the acquisition and acquisition of control of multiple motor passenger carriers. I realize that your vote on this matter will be taken on Friday and I felt that it is imperative that you be provided with this information.

Thank you for your attention to this matter.

Very truly yours,

Daniel B. Walsh

cc: Entertainment Tours, Inc.
Parties Identified in Application's Certificate of Service

ENTERED
Office of Proceedings

MAY - 9 2003

Part of
Public Record

207778

SURFACE TRANSPORTATION BOARD



STB Docket No. MC-F-20995

PETER PAN BUS LINES TRUST—PURCHASE AND ACQUISITION OF CONTROL—
ARROW ACQUISITION, LLC, BONANZA ACQUISITION, LLC, MAINE LINE, LLC,
PAWTUXET VALLEY, LLC, PETER PAN BOSTON, LLC,
AND PETER PAN BUS LINES, INC.

AFFIDAVIT OF MICHAEL CURRERI, IN SUPPORT OF THE COMMENT AND
OPPOSITION OF ENTERTAINMENT TOURS, INC.,
TO APPROVAL OF PURCHASE AND ACQUISITION OF CONTROL
WITH RESPECT TO THE PENDING APPLICATION OF PETER PAN BUS LINES TRUST

I, Michael Curreri, having personal knowledge of the facts stated herein, under oath do depose
and state as follows:

1. I am the treasurer of Entertainment Tours, Inc., 35 Roc Sam Drive, Braintree, Massachusetts. Entertainment Tours filed an opposition to the application of Peter Pan Bus Lines Trust to purchase and acquire five motor coach companies.
2. On Thursday, April 24, 2003, I saw an ad in the local Metro newspaper in which Peter Pan advertised it would begin running service between Boston's South Station and Penn Station. A true and accurate copy of the advertisement is attached hereto as Exhibit A.
3. On April, 24, 2003, I called Peter Pan's telephone number printed in the ad to get more information about the rates. The customer service representative put me through to his supervisor, Pat Moller, who told me to call Chris, the Peter Pan dispatcher.
4. I then called Chris at Peter Pan's office at South Station to get more information. Chris said Peter Pan was still putting the schedule together, so he would call me back with details.
5. Shortly thereafter, he called me back to say Peter Pan would begin offering this service on May 1, 2003. Chris told me that Peter Pan would charge \$10.00 one-way or \$20.00 for a round trip ticket.
6. The planned schedule was seven days a week, with up to three trips a day.
7. Chris said the busses would depart from Gate 23, adjacent to Entertainment Tours' only gate at South Station. Gate 23 is owned by another carrier, Plymouth & Brockton, which

would allow Peter Pan to use their gate.

8. Chris said passengers would pay the driver directly. Tickets could not be purchased at the Peter Pan/Greyhound ticket counter, nor could the tickets be purchased on the Peter Pan/Greyhound website.
9. On April 30, 2003, I ran into Peter Picnelli, Sr., at South Station, Boston, Massachusetts. Peter Picnelli, Sr., is the founder and chairman of the board of Peter Pan Bus Lines. He is actively involved in the operation of the company.
10. When I asked Mr. Picnelli about the \$10.00 fares to New York, he dismissed the promotion as just a bad rumor.
11. When I pressed him for more information, he kept repeating the promotion was a bad rumor.
12. To the best of my knowledge, Peter Pan did not offer the \$10.00 fare as of May 1, 2003, however, I believe that Peter Pan decided to delay the introduction of the fares at the last minute, pending the decision of the Surface Transportation Board.
13. Based on my experience with operating the identical route between Boston and New York, I believe such a low fare would not even cover the cost of fuel and other operating costs of the motor coach.
14. I further believe that if the STB approves Peter Pan's Application, Peter Pan will subsequently introduce fares below its costs to force other competitors out of business.
15. Clearly, a major carrier with financial resources could use predatory pricing to eliminate any competition in selected markets.
16. I again state that approval of this application would unquestionably result in a restraint of competition in this market and is inconsistent with the public interest.

VERIFICATION

I, Michael Curreri, verify under penalty of perjury, under the laws of the United States of America, that all information supplied herein on behalf of Entertainment Tours, Inc., is true and correct. I am qualified and authorized to file this affidavit.

I further certify under penalty of perjury under the laws of the United States, that I know that willful misstatements or omissions of material facts constitute Federal criminal violations punishable under 18 U.S.C. §1001 by imprisonment up to five years and fines up to \$10,000 for each offense. Additionally, these misstatements are punishable as perjury under U.S.C. §1621, which provides for fines up to \$2,000 or imprisonment up to five years for each offense.

Entertainment Tours, Inc.


By: Michael Curreri, Treasurer

CERTIFICATE OF SERVICE

I, Daniel B. Walsh, attorney for Entertainment Tours, Inc., hereby certify that on May 7, 2003, I served a copy of the Affidavit of Michael Curreri on the following parties:

Jeremy Kahn, Esq.
Kahn & Kahn
1730 Rhode Island Ave., N.W.
Suite 810
Washington, D.C. 20036

Federal Motor Carrier Safety Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

David H. Coburn, Esq.
Steptoe & Johnson, LLP
1330 Connecticut Ave., N.W.
Washington, D.C. 20036

Mr. Robert Cumpstone
Director, Motor Transport Services
Connecticut Department of Transportation
28 Berlin Turnpike
Newington, CT 06111

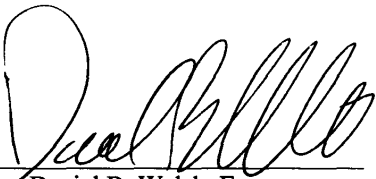
Director of Operations
Antitrust Division
U.S. Department of Justice
601 D Street, N.W., Room 1013
Washington, D.C. 20530

Mr. Brian Cristy
Director, Transportation Division
Massachusetts Department of Telecommunications
and Energy
One South Station
Boston, MA 02110

Premarmer Notification Office
Bureau of Competition
Room 303
Federal Trade Commission
Washington, D.C. 20580

Mr. William A. Maloney
Associate Administrator
Motor Carriers Division
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Ms. Jane Lincoln
Acting Commissioner
Maine Department of Transportation
16 Statehouse Station
Augusta, ME 04333


Daniel B. Walsh, Esq.

"EXHIBIT A"

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