



July 24, 2019

Acting NPS Information Collection Clearance Officer  
1201 Oakridge Drive  
Fort Collins, CO 80525

RE: OMB Control Number 1024-0268  
Commercial Use Authorization

Dear Acting NPS Information Collection Clearance Officer:

I am writing to express concern about the Commercial Use Authorization (CUA) permitting process for U.S. National Parks. As Executive Vice President for Gettysburg Foundation which is the primary non-profit partner working with Gettysburg National Military Park I am concerned about the impact on visitors. I am especially concerned about the impact on visitors to the Battlefield that are on a bus with an NPS Licensed Battlefield Guide (LBG).

Last fiscal year ended September 30, 2018 about 6,000 LBG bus guides for Battlefield Tours were reserved through our system. Almost 90% of this income goes directly to the LBGs and the rest is an administrative fee. Since about 80% of the LBG bus guides are reserved through Gettysburg Foundation, about 1,500 could have been self-booked last year. Many of these groups are school groups, military groups or others. These 7,500 LBG bus guides would have represented an estimated 300,000 visitors (at an average of 40 per bus). And extra \$5.00 per passenger on a bus would represent a 233% increase to the bus company over the \$150.00 per LBG bus guide they currently pay.

This would have a devastating impact on visitation and a hardship on the tour operators and their ultimate customers whether they are schools, military or other groups. Although a bus that holds 40 passenger has an impact on NPS facilities, this is less impactful than the equivalent of 20 cars for each bus.

As a primary non-profit partner working with Gettysburg National Military Park, we are supportive of the NPS and hope you can fully consider the impact to the visitors and either rescind or scale back the scheduled CUA increase.

If you have any questions, please contact me on my direct dial phone at 717-339-2116 or at [dbringman@gettysburgfoundation.org](mailto:dbringman@gettysburgfoundation.org).

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel M. Bringman". The signature is written in a cursive style with a large, stylized "D" and "M".

Daniel M. Bringman  
Executive Vice President & CFO