

National Park Service
US Department of the Interior

UPDATED May 28, 2019 - Questions on NPS Policies for Commercial Use Authorizations (CUAs) and Fees for Road-based Tour Operators. New content highlighted below.

Information about the updated CUA policies and park entry fees for road-based commercial tours is available at the National Park Service [Commercial Use Authorizations website](#) and [Entrance Fees by Park website](#). A recording of the May 6, 2019 webinar is available online.

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General Questions

- Is there a master list of NPS sites showing which require CUAs and the fees charged? Do CUAs only apply to a limited number of parks?

Per regulation, all commercial activities in all units of the National Park System (including parks, monuments, memorials, lakeshores, recreation areas, preserves, seashores, etc.) must be permitted, and the CUA is the mechanism to do this. Tour operators should assume all parks will issue and charge for road-based commercial tour CUAs beginning October 1, 2019, with standard fees charged at all NPS sites including a \$300 application fee per NPS managed site and a \$5 per person CUA management fee. If the NPS site charges an entrance fee, the \$5 per person CUA management fee will be collected when the group enters the park as part of the per person entrance fee for each passenger 16 years of age and older. Per person entrance fees vary by park. Please visit nps.gov to learn the per person entrance fee for each NPS site that charges an entrance fee. Parks, under very limited circumstances, may receive a waiver to opt out of the road-based commercial tour CUA requirements and fees. We will list parks that have such waivers on the [CUA website](#).

- Will NPS be publishing a final CUA implementation plan? There seems to be considerable confusion among operators as well as NPS units.

We have posted clear information on our website. We have responded to numerous questions (included here) and have presented two industry webinars in April and May, 2019. We plan additional webinars during the summer of 2019 to explain the use of our internet platform. Additionally, we have conducted two internal webinars to educate NPS staff on the CUA requirement and fees, and to insure standardization across all units of the NPS.

- Who will be ensuring compliance by the park units or adjudicating conflicts/disputes once the final program is decided and implemented? The regional office? The national CUA management team?

Unless parks have received a waiver, they must issue and charge for road-based commercial tour CUAs for CUA seasons after October 1, 2019. We will monitor the program at the Washington, DC,

and regional levels. Road-based commercial tour operators should always work with park staff to resolve disputes before contacting the regional or Washington, DC, office.

- Will there be a more uniform schedule for future changes or will operators now have to monitor all 419 parks individually and estimate their fees 2 years in advance?

The NPS intends to keep uniform fees for road-based commercial tour CUAs. NPS will adjust these fees periodically to account for increased costs including inflation. The NPS updated entrance fees in 2018 and will re-evaluate the entrance fee schedule again in 2021. The NPS intends to provide sufficient notice of fee changes to allow tour operators to account for such changes in their rate schedules.

- Does the National Park Service differentiate commercial from non-commercial and educational visitor groups?

Yes, non-commercial educational groups do not need to obtain a road-based commercial tour CUA. However, commercial entities who provided guided, for-profit tours to educational groups are subject to the CUA requirement.

Fee Questions

- What is happening in regards to entrance fees for National Monuments or Recreational Areas? Are those changing?

Entrance fees are changing for all NPS managed sites on October 1, 2019. This includes National Monuments, Recreation Areas, Historical and Military Sites, Lakeshores, Seashores, Parks, etc.

- Will the motorcoach entrance fee cease to exist October 1, 2019 or will it be listed as a variable rate going forward? Will it be pre-calculated or will we need to calculate the fees for each trip?

Beginning October 1, 2019, the commercial entrance fee schedule (motorcoach entrance fee) that is based on the vehicle capacity will no longer apply. Operators will pay entrance fees based on the park-specific per-person entrance fee for each passenger in the vehicle 16 and older. NPS.gov (Entrance Fees by Park) provides a list of NPS managed sites that charge an entrance fee.

- When/who/how do we pay the per person entrance fee?

Per person entrance fees are typically paid upon entrance to the NPS site. Payment methods may vary by location, but payment by credit card is preferred. Please visit nps.gov (Entrance Fees by Park) to learn the per person entrance fee for each NPS site that charges an entrance fee.

- With the new road-based tour fees, will those who have a senior pass be affected? Will tour operators have to account for them when they pay per person entrance fees?

Individual annual and lifetime passes will not be accepted for road-based commercial tour passengers. Tour operators must pay the per person entrance fee for all passengers.

- To clarify, for a motorcoach to enter a NPS site on or after October 1, 2019 we will have to apply and pay for a \$300 road-based tour CUA application fee for each park that we enter that year, plus a per person entrance fee at the time of arrival at the park. Will there be any other fees for the motorcoach?

Entrance fees based on vehicle capacity will go away on October 1, 2019, and will be replaced with per person entrance fees. A \$300 road-based commercial tour CUA application fee is required for each NPS site you visit during the year and a \$5 per person road-based CUA management fee will be included in the per person entrance fee collected at the time of entry for passengers 16 and older. Operators will also pay a \$5/person CUA management fee for passengers under 16. Road-based commercial tour CUA holders must pay the \$5 per person CUA management fee for operations in NPS managed sites that do not charge an entrance fee at the end of the year with the CUA Annual Report.

- There seems to be some conflicting and confusing information related to the ages of visitors that will be required to pay entrance fees. FLREA and many parks (e.g. Yosemite) currently have a policy that states that individuals 15 years old and under are exempt from all park entry fees, but it was stated during the webinar that individuals 16 years old and under are exempt from entry fees. One slide itself actually said both ages. Will this age be harmonized among all park units? This is important because it was also stated, that CUA management fees would still need to be collected on behalf of individuals who are exempt from park entrance fees. Do commercial tour operators now need to ID every school group they transport to determine which customers they need to generate a CUA management fee for and include in their annual report when everyone else on their trip is paying the park entrance fee?

Entrance fees are not collected in any park for visitors 15 and under. For those visitors, however, operators will pay a \$5/person CUA management fee upon park entry for parks that collect an entrance fee. For parks that do not collect an entrance fee, operators will pay a \$5/person CUA management for all visitors, including those 15 and under, upon submission of the annual CUA report.

- Will the \$5/person CUA management fee be waived for infants?

The road-based commercial tour CUA management fee will be waived for individuals 2 years of age and younger.

- In terms of the CUA management fee for those 15 & under that enter a park with an entrance fee, why not simply collect that amount at the time of entry to the park along with the rest of the CUA / entrance fee collection? The park is already collecting the entrance fee and earmarking the \$5.00 mgmt. fee for the adults in the group, so it would seem more straightforward to collect ALL fees at time of entrance. Forcing Road Based operators to manage this data and then report these exceptions at the end of the season when they've already paid the bulk of entrance and management fees at the gate seems unnecessary step and additionally burdensome. Please consider collecting the CUA for 15 and under at time of entrance at parks where the fees are paid locally.

We will collect the CUA management fee for those visitors 15 and under upon park entrance at parks collecting entrance fees.

- If we pay the per person entrance fee for visitors we bring to the park, will there be any additional road-based tour CUA fees due when the annual CUA report is submitted?

As explained above, the Service will collect the \$5 per person CUA fee upon park entry for parks collecting entrance fees.

- If the CUA program is designed "to collect reasonable fees for CUA administration and management" then why charge a road-based commercial tour CUA in a park that has not been charging such a fee and therefore has no associated cost?

Parks always have costs associated with managing commercial operations. The new road-based tour CUA requirement and associated fees brings us into compliance with our laws and standardizes the procedures for the tour industry.

- Who does the market price CUA fee apply to? Do market price fees apply to road-based operators?

The market price fee is an alternative method of calculating a reasonable management fee. We are not using that method for road-based commercial tours.

- How will we know the CUA application fee amount for each park? If we pay the \$5 per person road-based tour CUA management fee which is included in the entrance fee, why are there individual "application fees" if the same application can be used for every park?

A \$300 road-based tour CUA application fee is required for each NPS managed site visited to cover the costs of reviewing and processing the application for that park.

- How many park units currently collect CUA management fees in addition to the CUA permits? Is there a list?

All parks will require CUA applications and CUA management fees. Under very limited circumstances parks may be granted a waiver, and a list of those parks receiving a waiver will be available on the nps.gov CUA webpage.

Entrance Procedure Questions

- Will someone be boarding each motorcoach to count how many people are aboard when they collect the per-person entrance fee payment?

Generally not. NPS staff typically will rely on the count provided by the driver or guide. The National Park Service staff may occasionally verify the number of passengers on board.

- What if the tour company was expecting 53 people aboard the bus, but only 50 people show up the day of the trip, how much will the tour be charged for entry?

The entrance fee is per-person based on the number of people in the vehicle upon entry.

- Do we have to pay the per person entrance fee every time we enter a park? For example, we typically drive through Yellowstone on our way to West Yellowstone and then go back and tour the park the next day.

If your guide is bringing the same group of passengers back to a park while the weekly or daily entrance fee receipt still is valid, you can use the receipt to re-enter with the same group.

- How long will it take for vehicles to enter at the checkpoints and to be inspected by National Park Rangers?

As stated above, typically NPS will not “inspect” or count passengers. When this occurs, it should take only a few minutes.

- Does the Tour Directors/group leader have to present the entire 4-10 page CUA when they enter the park?

No. You only need to show the first page of your CUA, although tour leaders should have a copy of park conditions so they are aware of operating expectations. Some parks have set up different identification systems, but we have not implemented a national system.

- If a group arrives at the park and the Tour Director cannot provide a copy of the CUA, and the company actually holds a valid CUA, and the Tour Director simply didn't have it on hand, will the CUA application fee be charged again?

Yes. It is very important that tour operators provide the CUA to park staff to quickly verify that the tour has a valid CUA. Because tour companies only need to pay one road-based tour CUA application fee per year per park, we intend to refund duplicate application fees, but expect 6-8 weeks for processing such requests.

- How will NPS establish an efficient tracking system for groups and vehicles entering the parks? I.e. is any consideration given to transferrable permits, transponders or readable devices to keep lines moving at the entry points?

We are considering these and other options

CUA Requirement

- Do NPS sites that do not charge an entrance fee still have a road-based commercial tour CUA requirement and annual report requirement?

Yes. Operators still need to apply for a CUA, pay the \$300 CUA application fee, and pay a \$5/person CUA management fee due upon submission of annual CUA report submission.

- If we have groups arriving before October 1, 2019 do we still have to pay the new road-based commercial tour CUA fees?

Some parks may require these or other fees prior to October 1, 2019, but parks should not be collecting a CUA management fee upon park entrance until that date. These standard fees and fee collection process goes into effect in all NPS areas on October 1, 2019.

- Is the road-based commercial tour CUA needed per company or per vehicle?

CUAs are issued per company, not per vehicle.

- Is it possible to acquire a CUA for all year?

Road-based commercial tour CUAs are valid for one or two year periods, depending on the park CUA program.

- I am a Receptive Tour Operator. Do both the Tour Operator who is selling and pricing the tour and the Receptive Operator who is arranging the tour and selling it to the Tour Operator need the CUA?

The entity pricing, selling, and providing the tour should secure the road-based commercial tour CUA. In this example it would be the Tour Operator.

- We are part of larger company (Company A) that has offices in multiple locations (Company A DBA Location A). Can the larger company secure a CUA that covers us?

A company may apply for a CUA and that CUA covers all DBA companies. However, a separate CUA is still required for each park and for each type of operation in that park (e.g., a road-based commercial tour CUA and a guided hiking CUA).

- Will we be able to submit the same Certificate of Liability Insurance for ALL applications?

Commercial vehicle insurance requirements are the same at every park. General commercial liability policy coverage may vary based on superintendent determination. The online system will allow you to upload one insurance certificate and apply for CUAs in multiple parks.

- Does the tour operator still have to acquire the CUA if we don't own our own coaches, but we contract with a coach company that already has a CUA for each park we visit? If the coach company operates their own tours and already has a CUA, and then tour operators contract with that coach company for the use of their coach, it would seem the CUA is being paid twice if we also are required to obtain one. Would both need to file an annual report (what about double counting)?

After October 1, 2019, road-based commercial tour operators should assume they will need a CUA for every NPS unit in which they operate. If a tour company contracts with a transportation company to provide commercial transport, only one, not both of the companies, need to have a road-based commercial tour CUA. If the NPS has a need to manage commercial transportation at the park, however, transportation companies may need to obtain a transportation CUA and should contact the NPS managed site CUA office to determine whether that site requires transportation CUAs. The CUA website offers an interactive map feature allowing users to access individual park CUA websites and CUA staff contact information. Operators should contact the NPS sites they plan to visit to understand CUA requirements effective October 1, 2019. Every CUA holder has to submit an annual report.

- Can any tour operator, domestic or foreign based, use the CUA of the motorcoach company that is contracted to do the transportation in and out of national parks?

If the motorcoach company packages and sells tours and has a road-based commercial tour CUA, the tour operator, domestic or foreign based, does not need to secure a separate road-based commercial tour CUA. If the motorcoach company has a transportation CUA, the tour operator, domestic or foreign based must secure a road-based commercial tour CUA. If the tour does not stop or provide a narrative experience about the park area, however, and merely drives through a park area, the transportation CUA covers the entire service, and there is no need for a road-based commercial tour CUA.

- For parks without an entrance fee will we need to pay the road-based commercial tour CUA fee annually plus the \$5 CUA management fee per person and provide the mandatory annual reports? Does this include Great Smoky Mountains National Park? Is there a master list that outlines the requirements at each park?

For parks that do not have entrance fees, operators will pay a \$300 CUA application fee (due with the application) and a \$5/person CUA management fee for each visitor they bring to the park (due with the submission of the required annual CUA report). This includes Great Smoky Mountains National Park.

- If part of a group tour does a two hour hike in a national park, is a different CUA required other than the CUA that a motorcoach company would have that has been contracted for transportation purposes only?

Yes. Transportation CUAs only cover transportation. Similarly, road-based commercial tour CUAs only cover road-based commercial tour activities and minor additional services if allowed by the superintendent. In this example, another CUA is needed for the organized hike (e.g., guided day-hiking CUA).

- If a tour group is just passing through a National Park Service site do we need a CUA? No stops or sightseeing is conducted on the drive through.

If a tour group aboard a commercial vehicle makes no stops in a NPS site, including the visitor center or restrooms, and provides no narration or other information about the park, the Service will not require a road-based commercial tour CUA.

- I am a UK based tour operator that contracts directly with a US coach company. Do I also need a CUA? If I am reading this correctly I don't if the coach company applies for a road-based commercial tour CUA.

If the domestic company holds a road-based commercial tour CUA, you do not need to also secure a road-based commercial tour CUA. If the company holds a transportation CUA, you will need to secure a road-based commercial tour CUA.

- What if the tour operator doesn't know the make and model, license, year, etc. of the motorcoach, or it is substituted by the motorcoach company at the last minute? If you do not own your own the vehicles used in the tour, you do not need to submit this information with the road-based commercial tour CUA application.
- If we have a group of 5 people that rented their own van, but hired a tour guide, do they still have to pay for the CUA application fee?

The tour guide should secure a CUA. CUAs are required by law for all commercial operators.

- Do the motorcoach carriers that we hire for transportation, or that our clients hire, also have to obtain a CUA?

In some cases, parks may require carriers to obtain a transportation CUA. The transportation provider should contact specific parks to understand the requirements.

- If we board a shuttle supplied by the site to transport our travelers to the actual site property will the tour planner making the reservation be responsible for the permit application fee and the additional per person usage charge?

These situations present unique circumstances and we cannot provide a general response. We recommend you contact the park in question and ask them about specific requirements.

- Could a list be made for parks requiring transportation CUAs?

The online platform will more easily identify parks requiring transportation CUAs. Until the online platform is operational, operators need to visit individual park webpages to determine transportation CUA requirements.

- Will the new road-based commercial tour CUA requirement apply to National Historic Sites, Monuments or Military Parks? How does NPS plan to manage sites like the National Mall & monuments in DC?

Assume a road-based commercial tour CUA is required for all NPS managed sites, including historic sites, monuments, and military parks. We will list on the CUA website NPS managed sites that have received a waiver from the standard road-based commercial tour CUA requirements and standard fees.

- From where will the last-minute emergency park CUA permits be acquired? The CUA portal? Hand-printed at Individual parks? How long are they good for? Is an annual report still required if a temporary permit is acquired? What forms of payment will be accepted for the temporary permit?

We do not know what you mean by last-minute emergency CUAs and we have not contemplated issuing emergency CUAs. The park will provide temporary entry via a non-permitted entry form for operators that do not secure a CUA before coming to the park. The entry form will allow park entry for the same time period as the per-person entrance fee. Operators receiving the form and granted entry into parks should use the online platform to apply for a CUA. Park entrance stations accept cash, check, or credit card and prefer credit cards. If an operator chooses not to apply for a CUA after receiving a non-permitted entry form and pay the \$300 application fee, they still must submit an annual CUA report. Operators without a CUA or a valid entrance fee receipt must pay the \$300 application fee and use the non-permitted entry form each time they enter the park.

Reporting Requirements

- If the CUA management fees are already collected, what is the purpose of filing an annual report?

Every CUA holder in the NPS must submit the CUA Annual Report each year. This operational information allows the Service to manage the impacts of commercial use on the natural and cultural resources and the visiting public. Knowing the level of use an area receives allows park managers to measure and control the impacts of use, including trail maintenance, landscape maintenance, parking management, trash collection, utilities, and the visitor experience.

- Please explain the reporting of total number of passengers at the end of the year by the CUA holder and if there is a charge per passenger when reporting those numbers?

All CUA holders must report the number of people they brought to the park as a result of the approved commercial service. When submitting the annual report, road-based commercial tour CUA holders must pay a \$5 per person CUA management fee for operations in NPS managed sites that do not charge an entrance fee for all people they brought to the park three years of age and older.

- If tour operators have to submit a separate CUA for every park, why do you need to know every park that the tour company is going to visit that year? Why do you need to know the company's gross annual income?

All information collected by the standard CUA application and annual CUA report, including all parks visited and gross annual income, is approved for collection. You will have the ability to comment on information collection associated with the CUA program in Fall 2019. We will publish a notice in the Federal Register in advance.

- What questions will be asked on the single CUA application form?

A copy of the current CUA application is available on the [nps.gov CUA webpage](http://nps.gov).

- Will certificate of insurance still be required for the application? What amount will be required? Currently there are different amounts required per park.

By law, insurance is required for all CUA operators. Commercial vehicle insurance requirements should be the same in all parks for all interstate commercial operators. General commercial liability insurance (for activities occurring out of the -vehicle) may vary as requirements are ultimately determined by the park superintendent.

- On the CUA website, it states that “Failure to submit required reports or misrepresentation of reported statistics or earning will result in denial of your next CUA application.” Since road-based commercial tour operators, now have to file reports and obtain CUAs at every park that they go to, does this mean if they do not successfully fulfill the requirements at 1 of the 15 parks that they visit in a calendar year, that they will not be able to receive a CUA the following year for any of the parks they anticipate visiting?

The online platform will “flag” incomplete reports or missed payments. We are considering suspending all future CUA applications for operators until report and fee requirements are met. We will accept late reports and late payments.

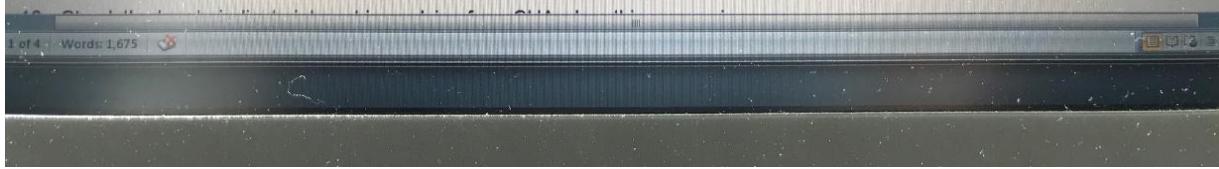
- Please clarify the highlighted requirements on the annual CUA report (below).

A report is required for each Commercial Use Authorization (CUA) issued. These instructions correspond to the numbered questions in Form 10-660.

1. Enter the contact information for the holder and primary contact as written on the CUA.
2. Enter the service the holder is authorized to provide as it appears on the CUA.
3. Enter the number of clients who made use of the commercial services provided under this CUA. Note: If you already submit monthly reports, we only require you to add the monthly reports together.
4. Enter the average number of hours or days a customer spends in the park engaging in your service.
5. Check the box that best describes the level of importance the park plays in providing the commercial services authorized under this CUA.
6. Enter the percentage of time clients spend in the park when engaged in the commercial service authorized under this CUA. Example: If you take clients on ten (10) mile rafting trips and eight (8) of the ten (10) miles are inside the park, then 80% of the activity takes place in the park OR if you spend four (4) hours on a hike and the last hour is hiking outside the park then you spend 75% of the activity in the park.
7. Enter total gross receipts for the holder (applicant) for the most recent business year. This is the total gross receipts the company brought in, regardless of whether or not the gross receipts are a result of the service provided under this CUA. Enter the total amount in US dollars. Gross receipts will not be made public by the Service except in accordance with law.
8. Enter the portion of gross receipts that are a result of providing the service authorized under this CUA. Multiply total gross receipts reported above (question 7) by the percentage of time your clients spend in the park (question 6). Enter the calculated amount in US dollars. Gross receipts will not be made public by the Service except in accordance with law.

Example: \$145,000.00 (question 7) x 75% (question 6) = \$108,750.00 (question 8)

9. Provide details of any reportable injuries incurred by the holder, the employees of the holder, or clients within the park during the term of this CUA.



The road-based commercial tour CUAs issued starting October 1, 2019, will expire on December 31, 2020. The annual CUA report for road-based tour operators will be due early 2021 for that term through the online system.

The form of the annual CUA report will be open for public comment through a Federal Register notice later this year. You will have an opportunity to comment on the form. If questions are unclear, please be prepared to comment on how we can improve those questions.

- What OMB approved form is required for applying for or reporting in relation to the transportation CUAs?

The OMB approved CUA application form and annual CUA report form are used for all types of operators. The forms are available on the nps.gov CUA webpage.

- Are annual reports required for transportation CUAs? Since that could theoretically lead to a requirement of 2 (different) CUAs for the same trip, wouldn't that lead to double counting of visitors? Doesn't this process of requiring multiple CUAs from the same traveling group in conflict with the plan that was announced on April 12, 2018?

We do not have concerns about receiving information that may be somewhat duplicative. Although some parks collect this information to count visitation, that is not the only purpose of collecting this information.

Online CUA System

- The NPS CUA webpage includes a statement: “We are working to create a centralized system allowing online application submission and expect the system to be in place in 2019.” What does this mean? Does this mean that a centralized CUA system is being developed? A singular check box format where all the parks visited can be selected at once and submissions made?

The National Park Service is working with a contractor to develop an online system to ease the application and reporting process for operators. We anticipate the system will allow applicants to submit multiple applications at one time and expect the system to be in place prior to October 1, 2019, for road-based commercial tour operators.

- How long should we expect it to take to get a response to our CUA application?

The new online system will speed up the application process, and we expect our response time generally will be less than two weeks.

- When can you do one CUA online and pick the parks you want to have the CUAs so there is only one form?

We expect the online system that will provide this functionality to be in place before October 1, 2019, so that operators can apply through the system. We will post more details as they become available.

- Will there ever come a time that we can get one permit for all the parks?

At this time, tour operators need to secure a separate CUA for each park site they visit. The online CUA platform will allow operators to submit one application and use that one application to apply for multiple parks.

- What if the CUA online portal is not ready in advance of the October 1, 2019 implementation deadline, will implementation be delayed?

As stated in the webinar, if the online platform is not ready in place for road-based tour operators on October 1, 2019, operators should be prepared to secure CUAs using our current system by contacting individual parks.

- How far in advance will one be able to apply for a CUA through the portal? How late before a trip will one be able to apply for a CUA through the portal? Currently, many of the CUAs are only available for application during a limited 2-3 month time period.

We expect CUA application processing through the online system will be much quicker than our current paper-based system and believe, in most instances, we will turn over applications in two weeks or less. Parks set the dates for accepting applications and we expect operators should be able to apply up to one year in advance.

- Will transportation CUAs also be available through the CUA portal?

We intend to manage the entire CUA program, including transportation CUAs, through the platform starting in 2021.

Transportation CUAs

- During the webinar, it was mentioned that NPS issued more than 6,000 total CUAs in 2018, how many of those were transportation CUAs and how many of those were from companies based more than 100 miles from the NPS unit they visited? Or are these mostly local/area vendors?
- This information will take us some time to compile. You should submit a FOIA request for this information. As we have said, currently we collect this information now from individual parks and have to compile it. We may not be able to identify how near companies are to the parks in which they operate. The online platform will allow us to track departure points, but we do not currently track that data in real time. Why would there be a uniform price and process for road-based commercial tour operator CUAs and not the same uniformity for transportation CUAs?

We received specific requests from tour industry groups to standardize the process and fees for road-based commercial tour CUAs. Road-based commercial tour CUAs are the only type of CUAs subject to standard fees and standard fee collection. We have no plans currently to standardize the process and fees for other types of commercial operators.

- Why would any park unit require a transportation CUA if the tour operator or chartering group of the same trip already has a road-based commercial tour operator CUA? Isn't it double charging the consumer?

If a park must manage commercial vehicle traffic (e.g., timed entry or reserved parking spots) the park may issue transportation CUAs and create CUA conditions specifically designed to control that use. This is separate from the road-based commercial tour CUA requirement and fees, and as such does not equate to double-charging.