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SGR/TAM Working Group

Communication and Coordination with External Stakeholders for Transit Asset Management

Abstract: This document outlines recommended practices for communicating with a range of stakeholders, both internal and external, about a transit agency's transit asset management (TAM) program and plan.

Keywords: transit asset management plans

Summary: Implementing an improved approach to TAM and preparing a transit asset management plan (TAMP) requires coordination among and communication with a range of different stakeholders. Some amount of coordination and communication is required simply to develop a TAMP and to meet federal requirements. Also, using effective strategies to communicate an agency's approach to TAM and to summarize its TAMP can help yield improved outcomes for the agency.

Scope and purpose: This document discusses the different stakeholders in a transit agency's TAM program and TAMP, and discusses requirements for coordination among these stakeholders. Also, it describes the benefits of effective communications with external stakeholders, strategies for communicating and considerations in protecting sensitive information.

This recommended practice represents a common viewpoint of those parties concerned with its provisions, namely transit operating/planning agencies, manufacturers, consultants, engineers and general interest groups. The application of any recommended practices or guidelines contained herein is voluntary. In some cases, federal and/or state regulations govern portions of a transit system's operations. In those cases, the government regulations take precedence over this standard. APTA recognizes that for certain applications, the standards or practices as implemented by individual transit agencies may be either more or less restrictive than those given in this document, unless referenced in federal regulations.

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Introduction

This introduction is not part of APTA-SUD-TAM-RP-006-19, "Communication and Coordination with External Stakeholders for Transit Asset Management."

APTA recommends the use of this document by:

- individuals or organizations that operate rail transit systems;
- individuals or organizations that contract with others for the operation of rail transit systems; and
- individuals or organizations that influence how rail transit systems are operated (including but not limited to consultants, designers and contractors).

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1. Transit asset management stakeholders

There are many stakeholders in a transit agency's transit asset management (TAM) program and development of its transit asset management plan (TAMP). It is important to know who these stakeholders are and what role they play when developing or updating a TAMP and determining how to communicate it. Considering how best to communicate can help an agency craft its message and communication approach to best address stakeholders' concerns and to help generate a positive response.

Below is a list of different organizations and other external groups a transit agency should consider in developing or updating its TAMP and determining how to communicate. The list includes stakeholders that may be considered either internal (involved in TAM and TAMP development) or external, depending on the transit agency and its approach to TAM. **Figure 1** illustrates typical questions each stakeholder may have related to a transit agency's TAM program. Note that communications to many of these stakeholders would become public information (including stakeholders such as boards and MPOs), so materials and messages should be provided in a manner and in language that can be understood by the layperson as well as the board members. In addition, TAMP materials often identify a backlog of asset replacements. Transit agencies should be ready to communicate about any backlog strategically and with proactive confidence before they provide details about asset values and backlogs.

- **Transit board:** These usually are the governing bodies for larger transit systems, approving budgets and work programs. A transit board is a potential external audience due to the fact that an agency's board would often not be directly involved in an agency TAM program or TAMP development. Also, the messaging to a board may be different from that to internal staff. In some cases, a board may play more of an advisory oversight role. Board members may also have a wide range of expertise in transit planning, programming and operations that may impact approaches to messaging.
- Municipal administration: Most smaller transit systems are funded and operated at the municipal level. The transit administrator will typically report to a municipal administrator or department head. Again, the level of expertise of the audience should be recognized in presenting the TAMP.
- Metropolitan planning organization: Census-defined urbanized areas with a population over 50,000 are required by federal transportation law to have a metropolitan planning organization (MPO). The MPO is responsible for planning and programming federal transportation funds received from the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA). Also, MPOs are responsible for setting regional performance targets, as described further in the next section. MPO boards typically are made up of state and municipal elected officials or department heads, but they may include a wide variety of members. The MPO board may play a lead role in selecting projects that will be funded, or it may play more of a passive role confirming project selections made by a transit board or state department of transportation. Likewise, an MPO may be directly involved in TAMP development or an external stakeholder. It is important to know the role the MPO plays and its level of expertise in TAM.

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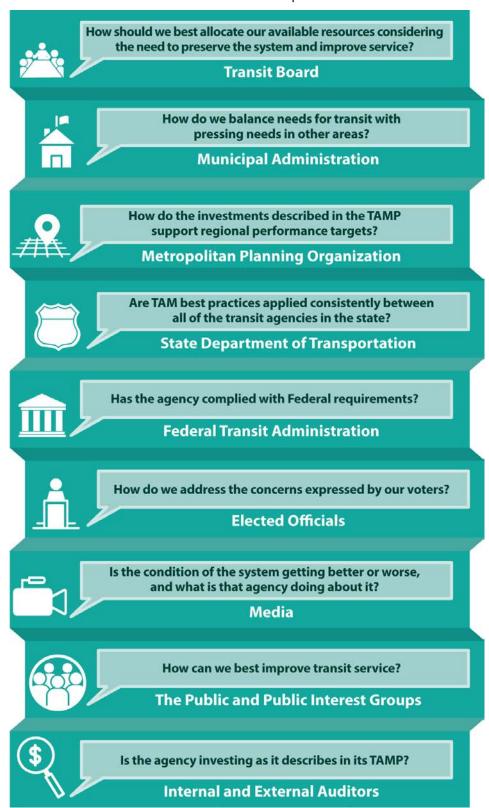
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NOTE: In some cases, a transit agency may serve multiple metropolitan areas, and thus need to coordinate with multiple MPOs.

- State department of transportation: State DOTs (and/or other state-level transportation agencies) play a lead role in developing group TAMPs for smaller transit agencies and agencies in rural areas. Most state DOTs have a full-time staff member dedicated to coordinating with transit agencies. State DOTs can play a wide variety of roles, potentially including regulatory, funding, oversight and operation of certain transit systems. It is important to coordinate with the state DOT staff to determine the level of expertise and detail needed for certain presentations.
- Federal Transit Administration: FTA administers federal transit funding, defines TAM requirements, and performs periodic audits to verify that transit agencies comply with TAM and other requirements. Annual reporting for the National Transit Database (NTD), required by TAM, includes data about the conditions of assets belonging to agencies. In addition, FTA provides various resources to support TAM and preparation of TAMPs. Thus, FTA is both a consumer of a transit agency's TAMP and a resource for helping prepare it.
- **Elected officials:** It is likely that once a TAMP has been developed, materials from the document, such as projections of future conditions or state-of-good-repair (SGR) needs, will be used for presentations to elected officials. Further, in many cases elected officials participate as part of the transit board or MPO. It is important to consider how the TAMP and the analyses that support it can best be communicated in a strategic manner to elected officials and various elected bodies, such as municipal councils or commissions, or a state general assembly. These bodies also may play a range of roles from regulatory to funding to oversight.
- Media: A transit agency should always be prepared to handle media requests. Such requests may arise
 from a TAMP, particularly if it is referenced in a budget or capital improvement program (CIP).
 Although developing communication materials that help best address media requests can be
 challenging, responding to media requests effectively can help an agency best communicate to the
 public at large.
- Public and public interest groups: Transit agencies should always plan for communicating information about the system to the public, including the riders of the system, public interest and advocacy groups, and the public at large. Staff should work with their executive leadership to determine what information to proactively provide to the public and how best to respond to requests for additional information.
- Internal and external auditors: In addition to FTA triennial reviews, the TAM program at transit agencies may be occasionally audited by internal groups or external organizations such as the Government Accountability Office. Auditors may have differing levels of knowledge about transit asset management and FTA requirements and will likely be more interested in detailed analyses than other stakeholders.

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FIGURE 1
TAM Stakeholders and Example Concerns



2. Required stakeholder communication and coordination

All transit agencies have some form of governance that requires communication and coordination among many of the different stakeholders listed above. Further, in its TAM requirements, FTA requires coordination among stakeholders for the purpose of developing the TAMP and setting TAM performance targets. In some instances, a level of coordination is needed among multiple transit agencies in a state or metropolitan area, especially when a limited source of investments has to ultimately support multiple capital needs. Coordination between the state DOT or MPO and transit agencies is needed to develop a group TAMP, but it may also be required when different agencies develop their own TAMPs but draw upon the same resources for funding.

Coordination is also required for setting TAM performance targets and obtaining MPO resolution of support for the targets set by a transit agency. Once set, TAM performance targets are reported by a transit agency to the National Transit Database (NTD).

FTA requires that transit agencies share their TAMP and supporting analyses with their MPO to support investment prioritization and regional target-setting. An effective approach that a lead agency, such as a state DOT, can use is to facilitate coordinated meetings to provide a platform for discussion between transit agencies and MPOs for ultimate agreement of regional performance targets and incorporation of measures into the planning process.

3. Benefits of effective stakeholder communication and coordination

As described above, a transit agency may have a large number of internal and external TAM stakeholders, and their specific roles may vary from one agency to another. Taking the time to communicate effectively with an agency's external stakeholders may require significant effort. Thus it is prudent to ask what the benefits of improving stakeholder communication are, beyond that required strictly for meeting federal requirements described above, given the many different competing priorities transit agencies must address. Effective stakeholder communication can help yield benefits such as the following:

- **Shared understanding of needs:** Providing information on the conditions and performance of a transit agency's assets, and of the need for keeping an agency's system in good repair, can help build consensus among different parties concerning what investments are needed and how they should be prioritized given the available resources.
- **Increased credibility:** When effective communication is lacking between the transit agency and its stakeholders, this may result in a situation in which stakeholders doubt the agency's decisions or data, and/or question the agency's priorities. On the other hand, communicating effectively helps build trust among stakeholders and increases each stakeholder's conviction that other stakeholders are acting in good faith and in the public interest.
- **Improved results:** Ultimately better communication can result in better outcomes. By communicating clearly to its stakeholders, a transit agency can increase the likelihood it will secure needed funding, and that funds obtained will be used in an effective manner. This, in turn, may help the transit agency make effective investments that improve the transit system and yield the best performance of the transit system over time.

4. Communication strategies

4.1 Introduction

This section describes approaches to communicating effectively with external stakeholders regarding a transit agency's TAM program and TAMP. The following subsections describe means of communicating, how to communicate basic TAM concepts, strategies for conveying data on conditions and performance, and approaches for discussing needed levels of investment to maintain assets in good repair. Also, frequently

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asked questions regarding a TAMP are discussed to help illustrate common challenges in communicating a TAMP and how to address them.

NOTE: APTA SUDS-TAM-RP-007-19 'Building Internal Stakeholder Support for an Asset Management Program' includes additional information on strategies for communication with internal stakeholders.

4.2 Means of communicating

Effective coordination with different TAM stakeholders may require use of a number of informal and formal means of communication. Informal communication approaches, such as peer-to-peer discussions and information sharing, are needed for day-to-day coordination internally and/or with a specific stakeholder group. More formal approaches, such as those listed below, require additional planning and preparation but can help effectively communicate the message the transit agency wishes to convey in the manner it wishes to convey it to one or more stakeholder groups.

Once it is developed, the TAMP itself is an agency's primary means for communicating asset conditions and performance, investment needs, and other information related to the agency's TAM program. In order to make the material more accessible to decision-makers and other stakeholders, the agency will likely wish to supplement the TAMP with an executive summary, as well as additional materials that communicate materials from the TAMP in an accessible format. Clear communication of the TAMP may be an opportunity for transit agencies to make strategic cases for funding to address asset replacement needs. Such additional means of communication include the following:

- websites
- presentations
- posters
- videos
- fact sheets
- reports and plans
- press releases
- social media

Examples of several of these approaches are provided in the following subsections.

4.3 How to summarize TAM concepts

One challenge many transit agencies face is communicating what TAM is and what it entails. Thus it is important to communicate basic TAM concepts clearly and succinctly in working with external stakeholders.

Fundamentally, TAM is a set of tools and approaches for helping manage physical transportation assets more efficiently. All transit agencies have physical assets and practice asset management in some form. Many transit agencies have been implementing systems and processes to improve their approach to asset management in recent years, making better use of data and systems to yield better outcomes. TAM helps agencies best maintain their assets, balancing the different competing needs for finite transit agency resources.

Figure 2 shows an example from a presentation by the Maryland Transit Administration (MTA) illustrating MTA's Asset Management Directive. This directive summarizes what TAM entails for MTA.

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FIGURE 2

Example Transit Asset Management Directive

Transit Asset Management Directive



Source: Barclay, J. "TAMP & Performance Measures." Presentation by MTA, 2018.

In addition to making good business sense, implementing an improved approach to TAM is a federal requirement. In 2016 FTA finalized a set of transit asset management requirements that U.S. agencies must follow. The requirements stipulate that transit agencies receiving federal funds must create an asset inventory, assess the condition and performance of their assets using a specific set of performance measures, and periodically develop a TAMP that helps guide asset investment decisions. These requirements are detailed in 49 Code of Federal Regulations (CFR) Parts 625 and 630. The regulations were initiated by the transportation authorization legislation Moving Ahead for Progress in the 21st Century (MAP-21) and subsequent Fixing America First Act (FAST).

NOTE: The four FTA performance measures are:

- 1) The percentage of revenue vehicles beyond their useful life,
- 2) the percentage of service vehicles beyond their useful life,
- 3) the percentage of track under performance restriction (for rail transit agencies only), and
- 4) the percentage of facilities below a condition "3" on the FTA's 1 (poor) to 5 (excellent) scale.

4.4 How to communicate conditions and performance

Communicating the condition and performance of agency assets can quickly get very detailed and technical. For most external audiences, it's important to keep the message simple and high-level. Communications guidelines include the following:

- Focus on the strategic reason the agency is communicating this information. Are you seeking more funding which would lead to emphasis of the needs or just communicating for general knowledge?
- Focus in on key messages based on the audience's interests. Are they more interested in understanding which assets are in the worst condition? Performance targets? How the current investment portfolio will or will not help bring the system into a state of good repair?
- Focus on summarizing conditions for high-level groups of assets. One approach is to align the summary with FTA's required performance measures for revenue vehicles, facilities, equipment and

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infrastructure. However, in some cases, agencies may have their own agency-specific asset hierarchy and performance measures to use.

- Use simple bar or line graphs to communicate performance targets and trends over time.
- Consider collapsing data on conditions into categories, such as assets in fair or better condition (3, 4 or 5) and assets and marginal or worse condition (1 or 2). Be sure to include the basic idea for how you intend to address the assets in the worst condition and how that relates to safety and reliability of service.
- Provide context and use pictures where possible. Use pictures of agency assets to help illustrate what is being discussed.

Figure 3 shows an example of the first page of a two-page fact sheet prepared by the Connecticut Department of Transportation (CTDOT) summarizing conditions and performance for buses. The sheet shows photographs of different types of buses, summarizes CTDOT's inventory, and provides the percentage of buses meeting CTDOT's Useful Life Benchmark (ULB), and the agency's ULB targets. The second page of the sheet provides additional information on planned investments and predicted conditions.

Connecticut Tier I Transit Asset Management Plan **Bus Rolling Stock** Description Inventory and Condition Transit Bus 496 12 **Articulated Bus** 51 12 Over-the-road Bus 60 12 utaway Bus Performance 42 5 **Current Performance and Targets**

FIGURE 3
Example Transit Asset Fact Sheet

Source: CTDOT Tier I Asset Management Plan. CTDOT, 2018.

4.5 How to talk about asset investment needs

One challenge in communicating about asset management is finding effective and concise ways to communicate a transit agency's investment needs, and the implications of meeting or not meeting those needs. Below are key concepts to focus on in communicating to external stakeholders.

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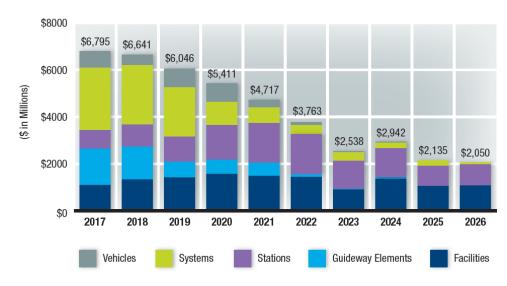
4.5.1 Importance of preserving existing transit assets

A transit agency's asset management investment need typically represents the cost of bringing its asset inventory into a state of good repair, and then maintaining assets in good repair over some period of time. But what is the significance of having assets in good repair to begin with? It is important to communicate that keeping assets in good repair typically costs less over the long run and results in a better quality of service for transit passengers. Just as homeowners need to invest in actions such as keeping their houses painted, or car owners need to maintain their cars, a transit agency must maintain its assets in good repair to minimize transit agency and transit user costs over time.

4.5.2 Backlog vs. cost to maintain

As noted above, an investment backlog is typically defined to be the cost of achieving SGR, and then maintaining it over time. **Figure 4** shows an example of how the Washington Metropolitan Area Transit Agency (WMATA) communicates its backlog of needed SGR investments. The figure shows the predicted backlog by year and the types of asset needs included in the backlog calculation.

FIGURE 4
Illustration of Predicted SGR Backlog
Impact of Capital Investment on State of Good Repair Backlog



Source: WMATA. Keeping Metro Safe, Reliable & Affordable: FY 2019-2028. WMATA, 2018.

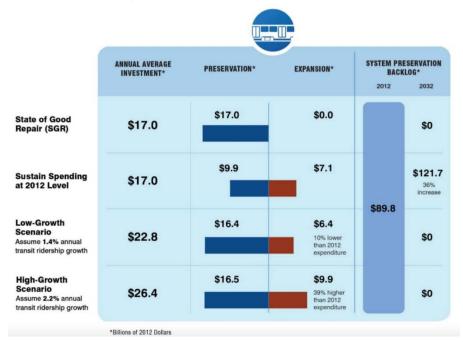
For some transit systems the backlog is very high—far greater than the transit agency's annual level of investment. In such situations, simply communicating the initial size of the backlog may not be particularly effective. Often it is more effective—and more realistic—to discuss the asset conditions that will result from the planned level of investment, and the cost to either maintain current conditions or achieve a specific target level of performance. For instance, in its biennial report to Congress on asset conditions, "Status of the Nation's Highways, Bridges and Transit: Condition and Performance," USDOT presents results for several investment scenarios, including one in which current funding levels are sustained, another in which investment needs are met, and additional high- and low-growth scenarios. **Figure 5** shows an example from this document.

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FIGURE 5

Summary of Alternative National-Level Funding Scenarios for Transit

2012–2032 Future Transit Capital Investment Scenarios



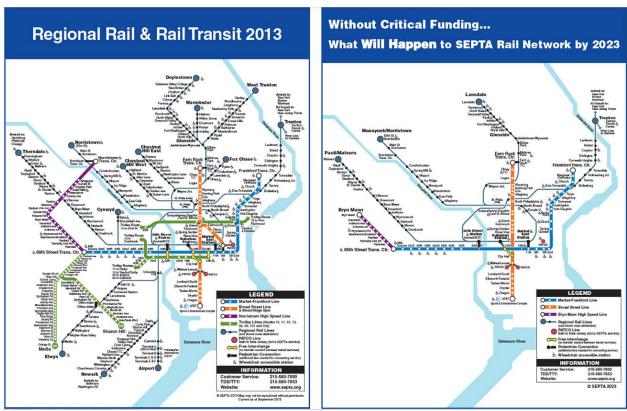
Source: USDOT. 2015 Status of the Nation's Highways, Bridges and Transit: Conditions and Performance. USDOT, 2016.

4.5.3 Communicating consequences of investment decisions

Another important consideration in communicating investment needs is determining how to most effectively communicate the consequences of meeting or failing to meet the need. Beyond showing results for multiple investment scenarios, it can be valuable to provide illustrative details concerning what a given investment level will mean to the transit agency and its passengers. What specific investments will be made if funding is increased? What services may need to be cut if assets are allowed to deteriorate? **Figure 6** illustrates an approach to communicating investment decisions used by the Southeastern Pennsylvania Transportation Authority (SEPTA). In 2013 SEPTA prepared its Service Realignment Plan, illustrating the current transit system and the future system SEPTA would be able to support without additional funding to address SGR needs. This helped inform the decision-making process, ultimately resulting in increased funding to address the investment needs.

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FIGURE 6 Example Illustration of Funding Implications



Source: SEPTA. SEPTA Service Realignment Plan: Calendar Years 2014-2023. SEPTA, 2013.

4.6 Frequently asked questions

This section discusses common questions stakeholders may have about a transit agency's TAMP or TAM program. An agency may or may not encounter these specific questions, depending on its operating context. However, when these or other similar questions arise, it is important to work with stakeholders to identify and resolve them. Example questions are as follows:

If 60% of our vehicles are beyond their useful life, does that mean they are unsafe?

"Poor" condition does not mean assets are unsafe to operate. Safety is the top priority for transit agencies, and management will always take steps to remove assets that are unsafe from service. Vehicles that are beyond their useful life may have more frequent breakdowns or become more costly to repair as parts become obsolete, but they are not inherently unsafe. Similarly, facilities in "marginal" conditions need to be rehabbed or remodeled but do not have qualities that make them unsafe for staff or customers. For many facilities, lower condition scores may be driven by several systems that need to be replaced (e.g., a roof, the HVAC system).

Note that useful life is typically expressed as an age, but FTA uses the term "Useful Life Benchmark (ULB)" rather than "useful life" to allow for use of additional criteria besides aging in establishing when an asset is in good repair, such as physical condition or mileage.

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How is it OK to have a performance target that 60% of our vehicles are beyond their useful life? How much will it cost to reduce the target to match the agency's target? What are we doing to lower our targets in the future?

The performance targets are based on current resources and investment plans. The targets look ahead one year and therefore are constrained by procurement timing (e.g., vehicle replacement is a multiyear acquisition process) and existing capital funds. Target-setting provides the opportunity to talk about resource needs and trade-offs. In most cases, better performance costs more money. For example, setting more aggressive targets (e.g., lower percentages of the fleet beyond their useful lives or fewer facilities in poor condition) may require more financial resources or reprogramming of funds from non-SGR projects. Targets also have to take into account an agency's capacity to implement a capital program. For example, staff resources are limited, as is track access.

The TAMP lists all the investments and activities the agency is planning to improve the condition of its assets. It outlines the process to prioritize which assets to replace or rehab first given current resources, and lists planned investments. Condition is one of the key factors considered in prioritization. If possible, it may be useful to project how the current investment plan will affect targets four, six or even 10 years from now to communicate whether current resources are sufficient. There is also an opportunity to highlight examples of how recent investments have improved asset condition, such as a facility rehab or a new fleet of vehicles.

Agency X is about the same age as us and/or has the same number of vehicles. Why are their targets and asset condition so much "better" than ours?

Current condition is a result of the resources dedicated to state of good repair over the past 10 to 20 years. The TAMP helps ensure that the agency is in a better place in the *next* 10 to 20 years. Vehicles don't suddenly get old, and facility conditions don't deteriorate overnight. Asset management is about understanding what the agency owns and planning for maintenance, rehab and replacement to ensure that it gets the maximum value from its assets. A TAMP helps manage this going forward.

Consistent funding streams are key to developing long-term plans to keep assets in good condition. The asset inventory and condition assessments included in the TAMP help the agency and its stakeholders plan ahead for what needs to be replaced. Consistent funding streams ensure that maintenance needs aren't deferred and that assets are replaced or rehabilitated on a schedule.

Why didn't we meet our targets last year?

Performance targets are a best guess about where the agency would be at the end of its fiscal year, but delays in procurement or emergency reprogramming of funds may mean that things change. The TAMP lays out the plan for improving the condition of assets, and the targets and the data should move in the right direction going forward.

Why have the transit agency's projections changed over time?

It is normal for an agency's projections of investment needs to change. Such changes may result from changes in asset conditions, changes in the value of the dollar, or other changes that impact how needs are defined, such as changes in technical standards for a given asset class. In addition, many agencies are continually improving the quality and detail of their asset inventory and condition ratings. However, in some cases, there may be changes over time in an agency's projections resulting from the processes and/or models used by the agency rather than a change in underlying conditions. Where changes result from adjustments to the modeling approaches, these are carefully documented.

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How do the numbers in the TAMP relate to needs estimates in other documents?

TAM projections are related to other agency and stakeholder analyses. A transit agency and its stakeholders produce many different documents that discuss future conditions and investment needs, including the TAMP, long-range transportation plans, transportation improvement plans and other capital planning documents. Given that these documents are produced at different times, it is often the case that different documents provide slightly different perspectives on conditions and investment needs. Further, they may differ in the scope of what types of investments they consider, the analysis time frame, whether or not they are fiscally constrained, and other important parameters. However, moving forward the data and analysis from an agency's TAMP are used to help inform other analyses.

5. Protecting sensitive information

A large amount of high-level agency inventory and condition information is available to the public via the National Transit Database (NTD). FTA requires agencies to annually report inventory, condition and performance target information for revenue vehicles, service vehicles, guideway and facilities to the NTD. This means anyone will be able to look at the list of revenue and service vehicles that agencies own, how old they are, how many facilities they have, and what their condition is. Members of the public will also be able to compare performance targets across agencies. Transit agencies should be ready to communicate strategically about those differences, what they mean, why they occur, and what they are planning to do about it.

As noted, transit agencies are also required to share their TAMPs with MPOs, including supporting analyses. Typically, the TAMP is a high-level document that doesn't contain sensitive information (e.g., that a particular security feature is out of service). Thus, transit agencies should omit any sensitive information from their TAMPs, such as personal information or security-related data.

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Related APTA standards

APTA SUDS-TAM-RP-004-19 Communicating Your Transit Asset Management Plan
APTA SUDS-TAM-RP-005-19 Improving Asset Management Through Better Asset Information
APTA SUDS-TAM-RP-007-19 Building Internal Stakeholder Support for an Asset Management Program

Resources

The following are additional resources regarding stakeholder management and communications:

- Crosset, J., Schneweis, K., Burns & McDonnell, Parris Communications, and CDM Smith. Communicating the Value of Preservation: A Playbook. National Cooperative Highway Research Program (NCHRP) Report 742. Transportation Research Board (TRB), 2012.
- Higgins, N., Basile, R., Van Hecke, S., Zissman, J. and Gilkeson, S. Data Visualization Methods for Transportation Agencies. NCHRP Web-Only Document 226. TRB, 2017.
- Spy Pond Partners, LLC, AECOM, McCollom, B. and Carrel, A. Guidance for Calculating the Return on Investment in Transit State of Good Repair. Transit Cooperative Research Program (TCRP) Report TBD (publication pending). TRB, 2019.
- Johnson, W. "How to Use TAM Information to Grab the Attention of Executives." Presentation from the 12th National Conference on Transportation Asset Management Conference. TRB, 2018. The presentation is available at the following URL (accessed March 2019): http://onlinepubs.trb.org/onlinepubs/Conferences/2018/AssetManagement/JohnsonColoradoDOT.pdf.
- Wageningen Centre for Development Innovation. Multi-Stakeholder Partnerships Guidebook.
 Wageningen University and Research, 2019. This online guidebook includes a list of over 60 process tools for how to engage stakeholders. It is available at the following URL (accessed March 2019): http://www.mspguide.org/.
- American Association of State Highway and Transportation Officials (AASHTO). AASHTO
 Transportation Asset Manual Portal. AASHTO, 2019. This online resource has a number of examples
 of TAM-related communication materials produced by public agencies. The portal is available at the
 following URL (accessed March 2019): http://www.tam-portal.com/resources/.

Abbreviations and acronyms

CIP capital improvement program

CTDOT Connecticut Department of Transportation

FAST Fixing America First Act

FHWA Federal Highway Administration FTA Federal Transit Administration

heating, ventilation and air conditioningMAP-21 Moving Ahead for Progress in the 21st Century

MPO metropolitan planning organizationMTA Maryland Transit Administration

NATSA North American Transportation Services Association

NTD National Transit Database

SEPTA Southeastern Pennsylvania Transportation Authority

SGR state of good repair

TAM transit asset management

TAMP transit asset management plan

ULB Useful Life Benchmark

USDOT U.S. Department of Transportation

WMATA Washington Metropolitan Area Transit Agency

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Document history

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