



AMERICAN  
PUBLIC  
TRANSPORTATION  
ASSOCIATION

February 1, 2016

Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Avenue S.E., W12-140  
Washington, DC 20590-0001

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**PRESIDENT & CEO**

Michael P. Melaniphy

**RE: Docket No. FTA-2015-0014**

Dear Docket Clerk:

On behalf of the more than 1,500 member organizations of the American Public Transportation Association (APTA), I write to provide comments on the Federal Transit Administration's (FTA) Notice of Proposed Rulemaking (NPRM) and request for comments on its Public Transportation Safety Certification Training Program, published on December 3, 2015 at 80 FR 75639.

**About APTA**

APTA is a non-profit international trade association of more than 1,500 public and private member organizations, including public transit systems; high-speed intercity passenger rail agencies; planning, design, construction and finance firms; product and service providers; academic institutions; and state associations and departments of transportation. More than ninety percent of Americans who use public transportation are served by APTA member transit systems.

**General Comments**

We believe the general parameters of the program are sound and the requirements reasonable. We remain concerned about several aspects of the availability of training:

- Capacity constraints – there is a finite availability of training available. Considering the needs of State safety Oversight Agencies, rail transit agencies, FTA itself, and the contractor community, as well as the evolving needs of public transportation who operate bus-only properties, we believe FTA must increase course availability. The alternative to increasing capacity would be to defer completion and, although an option, would be a poor substitute for readily available training.

- Training costs – a corollary to capacity constraints, the travel costs associated with a full menu of training are daunting. We believe FTA can take two specific steps to address both concerns. First, we urge FTA to open their training schedule as far into the future as possible. Knowing that a course is planned for a nearby location a year from now will help agencies and others make wise choices and minimize travel costs, rather than sending personnel to distant courses on a first available basis. Second, we believe that FTA should allow an on-line option for at least a portion of the required courses. This would relieve travel burdens and capacity issues simultaneously. We believe distance learning can be effective and efficient, and are always willing to assist in crafting this option.
- Contractor access to course – the contractor community must have access to courses and, given the need for competition, the universe of fully trained contractor personnel must be robust. This stresses the issues of capacity constraint and costs, and further points to the need for on-line alternatives.

We also believe FTA must create a framework for SSOA personnel to interact with the agencies they oversee to ensure SSOAs have a firm understanding of individual agency operations and can make informed judgments concerning agency safety efforts.

Finally, believe FTA should establish an objective measure of evaluating prior training and certification as it converts to this new program. Consistency, transparency, predictability, and speed are all crucial in this work and a publicly vetted evaluation policy is the best way to achieve all of these goals.

We appreciate the opportunity to assist FTA in this important endeavor. For additional information, please contact James LaRusch, APTA's chief counsel and vice president corporate affairs, at (202) 496-4808 or [jlarsch@apta.com](mailto:jlarsch@apta.com).

Sincerely yours,



Michael P. Melaniphy  
President & CEO

MPM/jpl:jr