



AMERICAN
PUBLIC
TRANSPORTATION
ASSOCIATION

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

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Michael P. Melaniphy

RE: Docket No. FTA-2015-0029

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) request for comments on its Supplemental Notice and Response to Comments on National Transit Database, published on November 18, 2015 at 80 FR 72137.

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

Our initial evaluation of the draft requirements finds this proposal vastly understates the administrative burden that would be placed on public transportation agencies. The draft requirements would demand a level of detail far more granular than any agency would ever use for its internal purposes and would net FTA little, if any, additional useful information. We urge FTA to withdraw this proposal and instead engage the industry to cooperatively build a valuable, practical resource.

Moreover, FTA should defer any additional reporting requirements until such time as it completes and promulgates a final rule on Transit Asset Management. The interaction of TAM and NTD reporting suggests that this effort is premature, particularly since the proposed measures are in some ways inconsistent.

Should FTA choose to move forward with NTD rulemaking in the absence of a final TAM rule, it should defer implementation for at least one year. Rather than extension being the exception, it should be the rule. Even the most sophisticated, newest systems have expressed a likely inability to comply in less than a year and, even with an additional year, compliance is questionable.

The introduction of broad-based age and condition reporting within the NTD system represents a substantial change in FTA practice. There is no reason to require such information for contracted assets where a contractual agreement requires a service contractor to provide a level of service utilizing assets of a prescribed quality. As noted in our TAM comments, agencies would remain free to track contractor assets where the condition of a contractor's assets are deemed vital as a matter of asset management. It should not be an NTD requirement.

FTA should acknowledge that reporting uniformity across all modes may be impractical or impossible. While uniform blank spaces in a reporting form make sense, the instructions should clarify that proper responses may include blanks.

Concerning support vehicles, FTA should not require NTD reporting. Similar to third party assets, the condition of such vehicles is a matter of asset management, not suitable for NTD compilation. Moreover, the costs of reporting on every support vehicle, many of which may serve not only a transit but other functions, far outweighs the value of collection.

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.

Sincerely yours,



Michael P. Melaniphy
President & CEO

MPM/jpl:jr