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Docket Management Facility:
U.S. Department of Transportation
1200 New Jersey Avenue SE., West Building
Ground Floor, Room W12-140
Washington, DC 20590-0001

RE: FTA-2016-0030

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 (FTA) Transit Asset Management: Proposed Guidebooks and request for comments, published on July 26, 2016 at 81 FR 48975.

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.

General Comments

We appreciate FTA developing guidance on both facility condition assessment and on calculating guideway performance restriction areas to aid in implementing the Transit Asset Management (TAM) Final Rule. However, the guidelines are more of reporting requirements for National Transit Database (NTD), and the final version of these guidelines should reflect this. There are additional methodological considerations that do not reflect the realities of transit asset management, and can cause transit systems to seem in a worse state of good repair than is actually the case.

Facility Condition Assessment

I. Introduction

We ask that FTA change the title of this document to “NTD Reporting Requirements for Facility Condition Assessment” to make it clear that this is for NTD reporting purposes. The current title does not indicate this, and appears to otherwise recommend to agencies that they use this for assessing their own facilities. Additionally, the introduction must recognize that agencies have to incorporate more than what NTD asks for in their own TAM plans.

II. Condition Assessment Procedures

Components and Subcomponents – We do not think that age alone is always the most appropriate means of assessing condition, especially as it applies to the electrical, plumbing, interiors, and potentially sites categories. The Guidebook does not reflect how the financial component plays a role in determining what to prioritize in the TAM plan. Investments in some of these categories may perform poorly in a cost-benefit/return-on-investment analysis in raising the overall Transit Economic Requirements Model (TERM) rating of the facility. Agencies should be allowed to determine what level of granularity is needed to demonstrate the cost-benefit improvements of receiving a higher TERM rating.

We disagree with the relatively equal weighting of components in the facility condition assessment. It is also problematic to include items in the rating that are important but not as integral to the overall state of good repair performance of the facility or system as items like shell or substructure that pose more immediate safety concerns. While important to a facility’s function, HVAC is not as integral to the building structure and does not pose immediate safety concerns as shell or substructure otherwise does. A broken HVAC system in a facility would receive a low rating and reduce the overall rating of the facility’s condition, but would not otherwise prevent the system from operating in a safe manner. FTA should provide alternative guidance that separates these most crucial state of good repair components from those that provide important but relatively ancillary benefits to meeting state of good repair targets.

Guideway Performance Restriction Calculation

I. Introduction

We ask that FTA change the title of this document to “NTD Reporting Requirements for Facility Condition Assessment” to make it clear that this is for NTD reporting purposes. The current title does not indicate this, and appears to otherwise recommend to agencies that they use this for assessing their own slow zones. Additionally, the introduction must recognize that agencies have to incorporate more than what NTD asks for in their own TAM plans.

II. Reporting

Slow zones sometimes exist for reasons other than unplanned failure. Agencies sometimes single track around routine maintenance intended to bring system into a state of good repair, or sometimes to meet agreements with community residents to mitigate noise impacts in the immediate area.

As a result, the guidelines must specify what is meant by “slow zone,” and provide measures for instances where the slow zones occur as a result of unplanned failure, as opposed to those that occur for other reasons, such as those mentioned above. Agencies would otherwise demonstrate lower performance since they must report restrictions that do not arise from unplanned failure.

III. Appendices

The reporting form provided in the template must allow for reporting of performance restricted zones based upon the reason for cause of restrictions, for example, community agreement, unplanned failure, and others, as described in the comments for Reporting.

We appreciate the opportunity to assist FTA in this important endeavor. For additional information, please contact Daniel Duff, Counsel to APTA, at (202) 496-4808 or dduff@apta.com.

Sincerely yours,



Richard A. White
Acting President & CEO

RAW/mh:jr