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U.S. Department of Transportation,
Office of the Under Secretary for Policy
Attn: Strategic Plan Comments
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Draft DOT Strategic Plan for FY 2018-2022

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 Office of the Under Secretary for Policy's Draft DOT Strategic Plan for FY 2018-2022, published on October 19, 2017.

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

Each weekday, 7,700 different service providers nationwide accommodate more than 35 million boardings in communities large and small. A total of 10.4 billion trips were taken aboard all the modes of public transportation in 2016. The draft strategic plan makes reference to 7.6 million commuters supported by U.S. transit systems. This refers to the number of people who commute on public transportation from the Census American Community Survey, while the 35 million figure is unlinked trips each weekday.

Workforce Development

APTA commends the references throughout the strategic plan regarding the DOT's continuing strategies, initiatives and efforts to address the workforce of the future.

- Acknowledging the industry's changing demographics, including retirements of the industry's experienced but aging workforce, APTA agrees that developing, and preparing a specifically-skilled transportation workforce within the Department and throughout the industry is the top priority.
- APTA encourages an even stronger emphasis on the investment and training required to attract, recruit and retain a workforce with increasingly diverse skill sets for a technologically complex and customer-focused industry.

APTA strongly supports the DOT's leadership in the national discussion on the impact of closing the nation's skills gaps for the transportation workforce to promote economic competitiveness.

The draft plan highlights the DOT's commitment to educating a future workforce. APTA recommends a stronger focus on how DOT proactively addresses the use of advanced strategies on the transportation workforce. As technologies advance and are steadily incorporated into the operations of the transportation sector, workforce needs will continue to evolve at increasingly progressive rates at all levels. Further analyses of skills gaps that must be filled with up-to-date training and planning of new potential certifications should be addressed.

APTA strongly commends the DOT's modal administrations' respective programs to address workforce issues. We encourage more leveraging of resources and intermodal coordination within the department to enhance the availability of training and development across modes.

APTA recognizes the role of workforce development covering the span of our industry, i.e. executive, management, technologists, frontline, among many others. The plan should acknowledge the importance of stakeholder input from grantees, industry and business associations, labor, academia, etc., as active participants in the investment, development and implementation of successful approaches to address workforce needs of the future. These current, non-traditional and future workforce partnerships and alliances should be expanded and elevated.

International Partners and Best Practice

There are several references in the DOT strategic plan to leveraging international partnerships and best practices. APTA has recently finalized a report on its April 2017 study mission to Hong Kong, Singapore and Tokyo, and would like to highlight the important lessons that can be learned on enterprise risk management, safety culture and innovative asset management and infrastructure development practices. For the full report [click here](#).

1. Safety Goal

- APTA agrees with the importance of maintaining safety as DOT's top strategic and organizational goal.
- Travel by transit is inherently safer than by highway. This is quantified in APTA's 2016 report "The Hidden Traffic Safety Solution: Public Transportation" which notes that a person can reduce his or her chance of being in an accident by more than 90 percent simply by taking public transit as opposed to commuting by car. This means a person traveling by public transportation is ten times safer per mile than traveling by auto, and that the more transit-oriented a community is, the safer it will become. A link to the 2016 report has been included [here](#).
- In pursuit of overall safety of the transportation system, APTA recommends that U.S. DOT adopt a strategy to increase the market share of public transportation to reduce the overall number of transportation related fatalities and injuries.
- Improved Safety Data Collection is an important strategy identified in the plan. APTA can assist by broadening its role in collecting transit industry safety data, as can other modal leaders for their respective modes.
- APTA strongly supports the U.S. DOT's efforts to take a more systemic approach to safety, such as the FTA's proposed adoption of a Safety Management System (SMS) approach for the transit safety program. SMS focuses on a performance-based approach, with requirements for continuous improvement and emphasis on data-driven decisions to minimize risks and strengthen safety. We encourage the Department to finalize FTA's Public Transportation Agency Safety Plan (PTASP) -- as required by 49 U.S.C. § 5329(d) -- to codify this approach.
- APTA suggests USDOT and TSA fully integrate regulatory, funding and other efforts related to safety to promote an all hazards approach of risk management as safety, security and emergency management functions may have overlapping interest and functions.

2. Infrastructure Goal

- Strategies for improving mobility services in rural areas and small towns should be identified and highlighted. APTA's new report "Public Transit's Impact on Rural and Small Towns: A Vital Mobility Link" notes the importance of public transportation in serving veterans and a growing percentage of people who need the life-connections transit provides. A link to the full report can be found [here](#).
- The plan also needs to emphasize the critical importance of policies and investments that keep our urban areas productive, efficient and competitive. A growing percentage of GNP comes from America's Metro economies, which provide the markets that will enable our non-urban economies to grow.

- Data available from asset management plans informs the discussion of the optimal condition and performance of the system. We also need to better understand and anticipate the infrastructure requirements of a future with electrification, automation and multimodal trip-making. For example, the anticipated rise of electric vehicles will present a new set of needs for our infrastructure systems. The same can be said for automated vehicles.
- Strong synergies can result from the bundling of public transportation with road-tolling and other pricing strategies. Such holistic approaches can be enormously effective in addressing transportation system performance in key strategic corridors.
- Several sections of the report state that federal support will be targeted to “projects of national significance that support DOT goals, leverage Federal funds, transform how infrastructure is delivered, and promise a high rate of social and economic return.” The federal surface transportation program has long been operated on the principle that state and local governments are best positioned to make decisions on the priority of transportation projects. With the exception of a limited number of programs such as the TIGER program and FTA’s Capital Investment Program, federal surface transportation funds are provided to state and local governments to decide how funds can best be allocated. That must continue as the guiding philosophy.
- In discretionary programs where US DOT has the ability to direct funding to projects of its choosing, a range of factors – beyond the priorities identified in the plan - need to be taken into account. While private sector participation in transportation projects should be encouraged, not all projects are positioned to turn a profit. That criteria alone should not be a determinant. Projects that promise a high rate of economic return should indeed have an advantage, but this must also be balanced by geographic and other factors. The new report by American Opportunity titled “Public Transit and Infrastructure Investment: A Synthesis of 20 Years of Conservative Thought” describes how transportation services that keep our regions mobile, connected, productive, efficient and internationally competitive is indeed in the national interest, and has been since the earliest days of the republic. A link to the report is provided [here](#).
- APTA appreciates the DOT’s efforts to speed up project delivery and encourage additional private sector investment in public transportation projects. Based on members’ experience, we believe that there are a number of changes the DOT could make to advance these efforts:
 - Alter or waive the requirement that projects be included in the STIP/TIP before they are eligible for federal grants. It is currently a requirement for projects to be included in the Statewide Transportation Improvement Program (STIP)/Transportation Improvement Program (TIP) before they are eligible for a federal grant. APTA recommends that this requirement be waived, as projects that obtain federal funding could be added to a STIP/TIP at a later date. Alternatively, the requirement could change to say that projects must be included in the STIP/TIP before federal award dollars are obligated.

- Ensure statutory equivalency across agencies, such that there is one agency lead and one federal environmental Record of Decision. This would streamline planning and environmental work, thereby reducing delays and costs associated with implementing public transportation projects.
- Statements on infrastructure permitting should continue to emphasize the need to ensure appropriate environmental requirements while accelerating processes.
- The resiliency of our transportation infrastructure is a key challenge facing America today and new standards of design and engineering are required. APTA commends the importance it is given in the new strategic plan.
- APTA agrees that the DOT could improve partnerships with various stakeholders to improve connectivity and accessibility, particularly for persons who are transportation-disadvantaged. America's transit agencies are pleased to be doing their part to provide transportation for senior citizens and people with disabilities. However, transit agencies were not intended to fully replace all of the specialized transportation services that are needed to support ongoing access to health care and human services as they do today. There is clearly both a service need and funding gap impacting the ability of senior citizens and people with disabilities to obtain critical health and employment services.
- Coordination of Medicare and Medicaid transportation programs and general public transportation services continues to pose significant challenges in many communities. APTA encourages the DOT to advance the efforts of the Coordinating Council on Access and Mobility (CCAM). This includes the development of the strategic plan this year and proposed changes to federal laws and regulations that will eliminate barriers to local transportation coordination and improve coordination of services across the federal government (there are more than 80 programs across federal agencies today that could deliver these transportation services but they lack coordination and adequate funding).

3. Innovation Goal

- As America's transportation system enters an era of transformational change, it is critical that DOT's strategic plan note that the focus not be on the technologies themselves, but on the broader social outcomes that stem from those technologies and the mobility services they spur. How will the outcomes result in stronger communities, less traffic per capita, fewer emissions per capita, and greater access to jobs, health, education and opportunity. That is the transformative crossroads that we face.
- In recent years, technology has revolutionized the transportation service industry in a variety of ways, and has encouraged the rise of on-demand transportation services (including Transportation Network Companies or TNCs, such as Uber and Lyft) that provide flexibility and convenience to their users. These on-demand services are finding ways to fill in gaps in public transit services. TNCs often function as informal shuttles to

transit stations, with many trips beginning or ending at a transit stations. Many TNC trips following this pattern region-by-region.

- As a publicly subsidized public transit provider, transit agencies are responsible for providing a product that reaches the entire public transportation marketplace, including low-income, minority, and disabled populations, to the maximum extent possible. So as transit agencies explore methods of extending the reach of the current service model and including partnerships with other service providers, they will need guidance from the Department on how we can do so while satisfying our core mission and meeting all federal requirements.
- New patterns of mobility will prompt the consideration of new definitions of public transportation and new questions on eligibility. DOT needs to anticipate the impact of evolving mobility models on formula programs and allocation of funds.
- In this era of big-data, DOT should pursue strategies for making data sources as user-friendly as possible, and available to help transportation providers make better decisions, evaluate their programs, and manage their performance.
- DOT should continue to provide technical assistance and pilot programs geared to helping the transit industry adapt to changing travel behavior trends, optimizing their efficiencies while so doing. The National Center for Mobility Management, and the Mobility Sandbox Pilot Program are excellent examples of DOT activities directed toward such outcomes. We are encouraged that the FTA has entered the space by launching a Shared Mobility online dialogue, providing some guidance according to existing laws, and funded a number of pilot projects through the Mobility on Demand (MOD) Sandbox program. The Department's analysis of the MOD projects and the guidance that comes from it will have near-term strategic importance.
- In addition, research programs should also be focused on current problems and challenges facing transit agencies, as identified by the transit agencies themselves.
- APTA emphasizes the importance of working with industry to develop standards that promote collaboration and continuous improvement versus compliance driven regulations that may not develop desired outcomes.

4. Accountability Goal

- The plan should identify the need to reduce the time and paperwork associated with grants and overlapping reviews.
- Technology continues to outpace standard procurement practices and is often outdated by the time agencies can procure it. To spur the ability to capture innovation and the development of evolving best procurement practices, agencies should be encouraged to

develop new innovative and competitive [pilot] procurement methods to secure technology in the timely manner necessary to maximize the return on investment.

We appreciate the opportunity to assist the Office of the Under Secretary for Policy in this important endeavor. For additional information, please contact Linda Ford, APTA's General Counsel, at (202) 496-4808 or lford@apta.com.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Richard A. White". The signature is fluid and cursive, with the first name being the most prominent.

Richard A. White
Acting President & CEO

RAW:pm/lcf