



June 15, 2011

Khem R. Sharma, PhD  
Chief, Size Standards Division  
U.S. Small Business Administration  
409 Third Street  
SW, Mail Code 6530  
Washington, DC 20416

**RE: Small Business Size Standards**

Dear Dr. Sharma:

On behalf of the 1,500 member organizations of the American Public Transportation Association (APTA), I write to provide comments on the U.S. Small Business Administration (SBA) Notice of Proposed Rulemaking concerning Small Business Size Standards: Professional, Scientific and Technical Services, published March 16, 2011, at 76 FR 14323.

***About APTA***

APTA is a non-profit international trade association of 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.

**Our Comments**

We fully support not only SBA's efforts to update the size standards but the administration's related efforts to simplify and consolidate those standards.

More than ten years have passed since the size standards have been adjusted, limiting the growth potential for small firms. The SBA's proposed revisions will support job growth and positively influence the climate for businesses both small and large. Moreover, we believe SBA's proposal to preserve the existing standards for those businesses that would be hurt by application of the administration's formula is sound and appropriate.

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We appreciate the opportunity to assist SBA 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,

A handwritten signature in cursive script, appearing to read "William Millar".

William Millar  
President

WM/jr