



December 23, 2010

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Mr. Robert Rupert
U.S. Department of Transportation
Federal Highway Administration
Office of Operations,
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: 23 CFR Part 511

Dear Mr. Rupert:

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 Highway Administration's (FHWA) Final rule; request for comments on the Real-Time System Management Information Program, published November 8, 2010, at 75 FR 68418.

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

APTA commends the FHWA for referencing transit operations in the Real-Time System Management Information Program. Real time information on transit operations is readily available from most major transit agencies and, in a growing number of cases, is provided to the public in a variety of electronic formats. Since there is no stipulation in the program defining the exact form of information collection and dissemination there is good reason to incorporate such data as a valuable input to real time traffic and transportation conditions. The interface for this provision should be incorporated in updates to regional ITS architectures if not already provided.

Provisions should also be made in the program for DOT's to provide real time information to transit agencies to allow for informed decision making and intermodal coordination.

Many of these interfaces have been developed in the course of the deployment of the "511" National Traveler Information program. It would seem appropriate to reference this resource as a logical component of the Real-Time System Management Information Program.

We appreciate the opportunity to assist the Department 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,

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

William Millar
President

WM/rk