Draft responses from webinar number 3

56. Small operators should follow the same basic guidance and requirements, except that reporting should be simplified in recognition of the less complex nature of small operations inventories. Utilizing the existing standards and guidance as the basis for all TAM planning will ensure planning is scalable. Relaxing reporting requirements, as well as phasing in those reporting requirements starting with a single asset class, will ease the burden on small operations.

57. FTA should not create a separate, new, and possibly different definition of small operations. States should be free to develop or certify small operations TAM plans based on the individual state's capabilities.

58. States and other direct recipients should be responsible for overseeing their sub-recipients in the TAM process, consistent with those responsibilities in other aspects of the transit program.

59. Yes, states should maintain a list of certified sub-recipients and their plans.

60. N/A

61. Generally, recipients should not be responsible for tracking assets owned, operated, and maintained by contractors. While they must remain vigilant to ensure equipment any used by contractors remains in a state of good repair, agencies that contract out services in this manner should not take on responsibility for assets that do not affect the future capital liabilities of the agency.

62. States should have the option of creating and administering a state-wide TAM plan.

75. With no possibility of a future federal liability and only a residual interest in the assets, FTA should not require TAM plan submission.

76. FTA should not enlarge on TAM plan requirements. Best practices could be collected and disseminated but FTA must remain clear with its oversight contractors and others that best practices are not requirements.

77. FTA must scrupulously avoid dictating what would essentially be contract terms. Contractors must remain free to determine how best to manage their own assets, since their concerns are often different from the public agencies they serve. Taxation, depreciation, and other factors may influence contractor decisions in this way. Moreover, extension of TAM plans into contractor owned, operated, and maintained assets would require some degree of limitation based on sound reasoning to avoid attempts to control asset management of those taxicabs in our example.

78. TAM plans should only apply to assets that represent future capital liabilities of the transit agency. FTA must acknowledge that numerous factors outside the control of the agency affect condition, not the least of which is the condition of the roads over which transit operates. Limiting TAM plans to future capital liabilities is the only logical means of avoiding the slippery slope of reporting on city streets and taxicabs.

79. TAM plans should apply to assets owned by the transit agency, even if operated by third parties. Replacement of these assets represents a future capital liability of the agency. While the TAM plan

requirements should not extend to lessees (which may be small, unsophisticated community or faith based operations) but the lessor agency should maintain control and accountability for the assets.

80. FTA should require only minimal details for capital asset inventories. Categories of assets should remain at the highest level and no more than a ‘thumbnail sketch’ of the underlying assets submitted. Requiring detail beyond this would be expensive and time consuming for agencies of all sizes and the information rendered of limited value to FTA. This also points out the need for transitioning into reporting by starting with a single asset class. Lessons can be learned more efficiently and then be more easily extended to other classes of assets to achieve the optimal balance of reporting pain and useful industry wide information.

81. Condition assessment is asset specific. It should not be codified in a regulation since it must remain adaptable to multiple situations. An agency’s own criteria should be resident in its TAM plan and applied consistently within the agency, allowing FTA to track progress rather than asset specific data from thousands of grantees.

82. FTA could provide useful technical assistance with templates and collected best practices, provided it guards against those templates and best practices becoming de facto requirements through the review process.

83. FTA should stay at the high level looking only to asset classes. Agencies may wish to list specific, significant, or capital intensive projects but there should be no fixed requirement to go below the asset class level. Going further risks creating conflicts between TAM plans and TIPs rather than consistency between them.

84. TAM plans must coordinate with the TIP and STIP processes and those processes should drive the time periods for investment prioritization.

85. FTA should neither recommend nor require for balancing competing interests. Local choices must be honored to preserve local control and to choose options best suited to an individual community. TAM plans should discuss trade-offs but FTA should not be second guessing informed choices.

86. This is too finite of a detail for FTA review or intervention. Ensuring an organization is coordinated and well run is beyond the FTA role.

87. FTA should not delve into this level of detail. Priorities change and local agencies and communities should not be shackled to past decisions in the face of changing priorities.

88. Safety is an element of consideration in asset management. Whether to prioritize replacement of an asset that can be operated safely subject to constraints or operate it under those constraints in favor of investing in something deemed more important is a local decision.

89. We have asked members to send in details of risk based investment decision making processes.

90. We do not believe that a risk based process would have to change to accommodate an agency’s greatest vulnerabilities but have asked members to send in examples where their own processes have evolved over time.

99. Best practices examples and peer exchanges are most helpful and would be welcome. Please keep in mind that FTA must guard against best practices becoming de facto standards.

100. We see no reason for FTA to compete with the private sector in this market.

101-104. We recommend FTA look to the FHWA model. The highway community has, albeit on a less complex level, engaged in asset management planning for some time and has taken on similar issues over time.

105. We have asked our members to directly submit examples.

106. Pilot grants, and funding to evaluate technology, peer exchanges, deterioration schedules, and condition assessment methodologies would all be extremely helpful in creating successful programs at every level.