

State of Good Repair

In working with our members, it has become abundantly clear that while creating a state of good repair (SGR) program applicable throughout the public transportation industry will require a great deal of variation and flexibility, there is no practical way for FTA to create a comprehensive framework for each variable – size, mode or modes, management structure, operating environment, etc. Instead, FTA should concentrate its efforts on a single framework that is broad enough to apply across the full spectrum of transit agencies.

To that effect, **the definition of a state of good repair should simply be that assets are fit for their intended purpose.** That is the basis on which APTA SGR-TAM-RP-002-13, the industry's recommended practice entitled *Defining a Transit Asset Management Framework to Achieve a State of Good Repair* is built. Along with APTA SGR-TAM-RP-001-13, *Creating a Transit Asset Management Program*, and the in progress recommended practice entitled *Capital Asset Inventory and Condition Assessment*, this body of work represents to the consensus views of the industry – APTA members, non-members, and FTA's own participants in the standards program – on the basics of SGR and transit asset management. These documents were creating and intended to be applicable to all sizes, modes, and variations of public transportation operations and are completely consistent with the framework laid out in FTA's recent presentations on SGR. We strongly urge FTA to adopt those documents as the basis of the SGR program.

The SGR program cannot be used to punish or reward agencies via funding decisions. While concentrating resources on underperforming properties may be an attractive option at first blush, the downstream consequences would be disastrous. Highly performing agencies would, in effect, be monetarily penalized while poor performers would be incentivized to continued poor performance. FTA can effectively carry out its intent to institutionalize a state of good repair throughout the industry through limiting the use of funds by poorly performing agencies, not by shifting funds among recipients based on the status of their fleets and facilities.

SGR funding should not be limited to repair or replacement of failed equipment or facilities.

Maintaining a state of good repair is far more economical and beneficial than allowing that equipment and facilities to fall into a state of disrepair, then try to recover. Regular efforts to maintain a state of good repair should be a fully acceptable use of SGR funding.

FTA must guard against creating a recording keeping burden. Agencies already report extensively through the National Transit Database. Agencies, large and small alike, spend substantial time and money accomplishing this. We urge FTA to, in each instance where some compilation or submission of information is contemplated, consider the collection, compilation, and reporting burden, compare it against the value of the information to both FTA and the individual agency, and look for other aspects of NTD reporting that do not carry the same or greater value. If the record keeping and reporting burden is overly ambitious, it could undermine the intent of the SGR program itself by diverting sorely-needed assets.