

Part 3 Transit Asset Management

As with the definition of ‘state of good repair’ (SGR), transit asset management (TAM) plans will require a great deal of variation and flexibility, with 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 and simply exempt the smallest of agencies from some reporting requirements.

We believe **FTA must create a framework that will allow existing TAM plans to continue.** Many transit agencies already have robust, well established programs that are clearly effective. These agencies have invested a great deal in creating these programs, they are consistent with existing FTA guidance and FTA-sponsored standards, and forcing those programs into a different framework would be counterproductive.

The baseline for the FTA program should be its October, 2012 Asset Management Guide, APTA SGR-TAM-RP-002-13, *Defining a Transit Asset Management Framework to Achieve a State of Good Repair*, APTA SGR-TAM-RP-001-13, *Creating a Transit Asset Management Program*, and APTA-SGR-TAM-RP-xxx-13, *Capital Asset Inventory and Condition Assessment*. This body of work represents to the consensus views of the industry, were each drafted or supported by FTA itself, and were created and intended to be applicable to all sizes, modes, and variations of public transportation operations. We strongly urge FTA to adopt those documents as the basis of the TAM program.

The TAM program should be phased in. For much of the transit industry, TAM concepts represent a substantial change in management practices. Small agencies in particular will be required to institute substantial, formal practices that will require a gradual implementation. Our members believe that can best be accomplished by starting with a single asset class – rolling stock – and using that experience to build strong, useful programs at all transit agencies. Those agencies with established programs can continue, refine, and improve their programs, but the baseline requirement for those with less experience should be limited.

Reporting burdens must be minimized. FTA’s pilot program made it clear that overly onerous NTD reporting is among the biggest potential barriers to implementing a strong program. Agencies, large and small alike, already spend substantial time and money completing NTD reporting requirements. FTA must guard against collecting information for information sake. As with SGR, 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.

Assets owned, operated, and maintained by third parties must be differentiated. While we believe TAM plans must consider future capital liabilities of the agency, FTA must acknowledge that third party contractors obligated to provide serviceable, functional, safe equipment cannot be brought fully into the agency’s TAM plan. The further assets are from agency control and future capital liability, the further outside agency control those assets should be. As an example, an agency that utilizes taxicab vouchers

as an aspect of its paratransit program should not have to manage the condition of private taxicabs that accept those vouchers.

FTA's technical assistance should be heavily weighted toward examples, workshops, and other illustrative work. FTA cannot reasonably be prescriptive in this program but can serve as a clearing house for best practices by making examples of successful programs from a variety of agencies and situations available to all grantees.

FTA review must remain at the highest level to be successful. We caution that FTA should not attempt to gather information on inventories, specific equipment, or similar detail in the normal course of business. Not only would such requirements tip the cost benefit scale into negative territory for agencies, but they would also lead to an uncoordinated national program with differing standards across the country and an overwhelming burden on FTA itself.