



April 7, 2009

U.S. Department of Transportation
Docket Operations
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Federal Transit Administration Docket Number FTA-2009-0015

Dear Docket Clerk:

On behalf of the almost 1,500 member organizations of the American Public Transportation Association (APTA), I write to provide comment on the Notice of Availability of FY 2009 Funding for Transit Investments for Greenhouse Gas and Energy Reduction Grants (the Notice), published March 24, 2009, at 74 FR 12447.

About APTA

APTA is a non-profit international trade association of almost 1,500 public and private member organizations, including transit systems; 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 Comment

We believe FTA has, in the midst of the monumental requirements and severe time limitations incorporated into the *American Recovery and Reinvestment Act* (ARRA), has done an exemplary job in crafting the framework for the TIGGER Program. The fact that grants are available under a workable, logically constructed program that did not exist some nine weeks ago is a tribute to the dedication of the FTA staff. We especially appreciate the fact that FTA incorporated industry comments into the draft, despite the limited time available.

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We remain concerned that in describing eligible expenses in section II.C of the Notice, FTA has excluded fleet expansion, assuming the impact on transit agency emissions and energy consumption would be increased. We believe FTA should instead acknowledge that a fleet expansion, conducted in conjunction with fleet replacement, could reduce overall emissions and energy consumption where, for example, eight inefficient buses were replaced with nine highly efficient buses. The nine new buses in the expanded fleet could still accomplish the program goals.

As always, we appreciate this opportunity to work with FTA on this important aspect of transit and environmental policy. For additional information, please contact James LaRusch of my staff at (202)496-4808 or jlarsch@apta.com.

Sincerely yours,

A handwritten signature in black ink, appearing to read "William W. Millar". The signature is fluid and cursive, with the first name "William" and last name "Millar" clearly distinguishable.

William W. Millar
President

WWM/rk