



January 18, 2012

The Honorable Joseph Pitts
United States House of Representatives
420 Cannon House Office Building
Washington, DC 20515

Dear Representative Pitts:

On behalf of the more than 1,500 members of the American Public Transportation Association (APTA), I am pleased to express APTA's support for your bill, H.R. 3545, the Transit System Flexibility Protection Act of 2011. This language is consistent with the APTA endorsed position for surface transportation reauthorization that addresses the operating needs of small transit systems, principally those operating less than 100 buses in urbanized areas with more than 200,000 people.

As you are aware, when new census data becomes available it is expected that many more communities will exceed the 200,000 population threshold, thereby triggering Federal Transit Administration (FTA) rules which prohibit small transit systems from using federal funds to operate bus service. The 100 Bus Coalition has been working for the last six years to change this language to allow the nearly 200 small transit systems in these urbanized areas to retain the flexibility to use federal funds to operate service. The use of operating assistance by these small systems is vital to their ability to provide public transit service in their communities.

For these transit systems, the 200,000 population level is arbitrary and does not reflect the level of service or the service area in which bus service is provided. The multi-tiered approach contained in H.R. 3545 is a practical solution as it is based on the number of buses operated. Generally, the greater the number of buses a system operates, the less that a system needs to rely on federal operating assistance. The language in H.R. 3545 does not require additional federal funding, but yet, it is an important way to preserve current transit service in small communities around the country and ensure continued access to jobs for many riders of the systems.

We believe that the language in H.R. 3545 is a critical part of the long term reauthorization of surface transportation law for APTA and its members.

Thank you for your support for public transportation, and especially for your support for our nation's small transit operators. If you have any questions or need any additional information, please do not hesitate to contact Brian Tynan, APTA Government Affairs, at (202) 496-4897 or btynan@apta.com.

Sincerely yours,

Michael P. Melaniphy
President & CEO

Cc: Representative John L. Mica
Representative Nick J. Rahall, II

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