



September 9, 2013

U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Docket Operations, M-30  
West Building Ground Floor  
Room W12-140  
Washington, DC 20590-0001

**RE: Docket No. FTA-2013-0026**

Dear Docket Clerk:

On behalf of the more than 1,500 member organizations of the American Public Transportation Association (APTA), I write to provide comments on the Federal Transit Administration's (FTA) Proposed Circular on Enhanced Mobility for Seniors and Persons With Disabilities, which was released for comment on July 11, 2013, at 78 FR 41824.

*About APTA*

APTA is a non-profit international trade association of more than 1,500 public and private member organizations, including public transit systems; high-speed intercity passenger rail agencies; 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.

APTA speaks for its members. Its Board of Directors reiterated that fact on March 9, 2013, when it adopted the following statement: "While APTA encourages its members to provide specific examples or impacts in support of the association's positions, APTA crafts its comments to represent those of all APTA members. The association goes to great lengths to ensure its regulatory comments represent the consensus views of our members. Every APTA member has the opportunity to review drafts, participate in discussions, and assist in crafting those consensus comments. In short, we speak with a single voice and, when the rare instance occurs that we cannot reach consensus, we do not speak at all. APTA's comments are those of our more than 1,500 members. This consensus-based method of crafting regulatory comments is a factor underlying APTA's selection of one of Washington's most trusted brands in a broad survey conducted by the National Journal and we encourage all federal agencies to recognize the representative nature of the association's regulatory comments."

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## **GENERAL COMMENTS**

APTA appreciates FTA's efforts to conform the circular to the new requirements of the *Moving Ahead for Progress in the 21<sup>st</sup> Century Act* (MAP-21) and improve access to public transportation for our most vulnerable riders. As FTA continues these efforts, we encourage the Administration to continuously consult APTA, its members, and our partner organizations representing people with disabilities to ensure the program is as efficient as possible.

### ***Performance Measures***

While we understand the statutory mandate to institute performance measures, we urge FTA to simplify reporting requirements to the maximum extent possible. The nature of these programs necessarily means many sub-recipients will have neither the staff nor the expertise to provide extensive or complex data to the recipients ultimately responsible for reporting under the proposed approach. Reporting for geographic coverage should be limited to political jurisdictions served, since there is no reasonable, reliable, consistent means of reporting greater detail. Similarly, we encourage FTA to minimize the reporting burden related to service quality and service times.

### ***Coordinated Planning***

We fully support involvement of seniors and persons with disabilities in the planning process. However, we do not believe FTA should impose a regulatory mandate to include these riders in the "approval" of coordinated plans. The proposed language in Chapter V suggests these riders would essentially hold veto power over coordinated plans – a concept that would complicate an already complex planning process. FTA should limit the mandate to involvement in the development of plans.

We appreciate the opportunity to assist FTA in this important endeavor. For additional information, please contact James LaRusch, APTA's chief counsel and vice president corporate affairs, at (202) 496-4808 or [jlarsch@apta.com](mailto:jlarsch@apta.com).

Sincerely yours,



Michael P. Melaniphy  
President & CEO

MPM/jpl