



November 25, 2013

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Floor
Room W-12-140
Washington, DC 20590-0001

RE: Docket No. FTA-2013-0023

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) Request for Comments on Formula Grants for Rural Areas: Guidance and Application Instructions, published September 26, 2013 at 78 FR 59415.

About APTA

APTA is a non-profit international trade association of 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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APTA Endorses the AASHTO Comments

APTA enjoys a strong collaborative relationship with our colleagues at the American Association of State Highway and Transportation Officials (AASHTO), in particular with the AASHTO Standing Committee on Public Transportation. We have reviewed the comprehensive, well-reasoned comments AASHTO comments, dated today, and unequivocally endorse those comments. AASHTO's observations, calls for clarity and consistency, and other comments are uniformly designed to make the program more efficient at every level.

We appreciate the opportunity to assist the FTA in streamlining and simplifying this important program and would be happy to provide any additional information necessary to complete this process. For additional information, please contact James LaRusch, APTA's chief counsel and vice president corporate affairs, at (202) 496-4808 or jlarsch@apta.com.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michael P. Melaniphy". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael P. Melaniphy
President & CEO