

## Draft responses from webinar number

63. While there is no objective means of defining the balance between precise measurement and costs, we believe FTA must consistently return to costs at each step of program development. These reviews should look to the level of precision obtained, what exactly FTA would do (or not do) with this additional information, what agencies would do (if anything) with this additional information, and the cost of compiling and reporting the information to query whether the cumulative costs to the industry – operators, oversight agencies, and FTA – is justified. As a starting point, it seems abundantly clear that reporting must be broad categories and certainly not asset-by-asset. We recommend FTA adopt the asset breakdown structure in RP-xxx-00x-13 and require only top tier reporting. Individual properties with more mature systems could elect to operate at the more precise tiers but the baseline requirement should remain top tier.

64. As noted in our general comments, attempting to create objective criteria based on size, mode, or other factors is likely to be unworkable. The number of variations required would be enormous, unmanageable by FTA, and potentially damaging to the industry. Such a complex scenario would invariably invite second guessing at every level. The top tier approach discussed above would eliminate the need for separate standards, allow systems' SGR programs to mature over time, and provide FTA sufficient, broad-based information to reasonably assess the state of the industry as a whole.

65. Reporting on general asset classes is appropriate, as described in RP-xxx-00x-13, but in measuring SGR, FTA must keep in mind the basic definition – whether an asset is fit for its intended purpose. Creating different approaches will simply make the process more complex than it must be and the quality of information gathered will suffer as definitions vary throughout FTA regions and among agencies.

66. FTA should not dictate approaches in this manner. RP-xxx-00x-13 includes a functional, adaptable methodology, created by industry consensus, and drawn from the real-world experience of the Chicago Regional Transportation Authority, that should serve as the basis for the FTA program.

67. FTA adoption of a single approach, without freedom among its grantees to approach performance measures and target suited to their individual properties would limit the industry's ability to craft and implement achievable plans.

68. & 69. These questions presume the answers to the questions above endorse an unduly complex, multiple layer system that will cost more to implement than it saves through sound business practices.

70. The definition of SGR should remain simple. Attempting to add and balance the factors enumerated in this question would make it almost impossible to craft the definition itself.

71. See answers 68 & 69.

72. This should be up to individual properties. FTA is not adequately positioned, staffed, or resourced to get into this fine level of detail and effectively account for varying local conditions across the spectrum of operations.

73. A good example of what agencies currently do is in Appendix A, RP-xxx-00x-13. We have asked our members to supply associated costs with this effort.

74. FTA should simply adopt the industry standard expressed in RP-xxx-00x-13, RP-001-13, and RP-002-13.

91. FTA should seek information on the broad asset classes as defined in RP-xxx-00x-13. It should not continue with the approach taken in the SGR pilot. In that pilot program, even sophisticated, large agencies found the reporting requirements unduly onerous and the data collected not necessarily useful for other than NTD reporting. No data should be required that does not have utility to the agency itself in the first instance.

92. Performance based reporting would be superior to multiple, rigid, standardized measures that do not account for variation in operating environments. Simple, performance based reporting would have internal utility, be consistent with current NTD reporting requirements, and provide high level visibility for FTA.

93. Differing standards would not be necessary under a performance based approach drawn from the standards documents referenced throughout this section.

94. SGR targets should be locally developed and maintained. Reporting them through NTD would not improve FTA visibility of the overall situation and could prove problematical for agencies. With no protection of data, differences in targets could be used against agencies through the courts and political processes. Agencies striving for strong continued improvement would do so at their own peril and the system would encourage 'achievable' goals, weakening the SGR program overall.

95. Setting targets should be left to local authorities. Dictating system-wide, asset-class, or other targets limits the utility of the program.

96. This question presumes national targets, centrally set. We have warned above about the diminished value the program would have under those circumstances.

97. Given the immense backlog of maintenance requirements throughout the industry, short and long range targets will be necessary in virtually every system. The time horizons for those long term goals will likely vary greatly based on a variety of factors and unique to individual agencies.

98. Agencies should be allowed to certify SGR and eligibility if they have an SGR program in place and are making satisfactory progress toward their established goals. This must stay at a high level to be workable for any transit agency from the largest to smallest.