



August 3, 2026

Mr. Matthew Cahill
Acting Deputy Administrator
Federal Transit Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590-0001

**Re: Federal Transit Administration Request for Information on Family Friendly Transit
(Docket No. FTA-2026-0232)**

Dear Mr. Cahill:

The American Public Transportation Association (APTA) represents the \$102 billion public transportation industry that directly employs more than 450,000 people and supports millions of private-sector jobs. Our members deliver essential daily mobility to more than 25 million Americans.

On behalf of our members, APTA appreciates the opportunity to respond to the Federal Transit Administration's (FTA) Request for Information (RFI) on Family Friendly Transit published in the *Federal Register* at 91 Fed. Reg. 33894 on June 4, 2026 (Family Friendly Transit RFI). APTA shares FTA's goal of ensuring safe, clean, and efficient transit systems, and we greatly appreciate the strong partnership and ongoing dialogue between FTA and APTA on these issues.

Any discussion of Family Friendly Transit service must begin with safety. Safety is the public transportation industry's highest priority, including for bus and passenger rail operators. The employees who manage and operate public transportation systems are committed to strengthening the safety of their systems, passengers, colleagues, and the public. As a result of this extraordinary commitment to safety, traveling by public transportation is 10 times safer for passengers than traveling by car. Even with this exceptional track record, public transit agencies are implementing important innovations, improvements, and new policies across the industry that are helping transit provide the safest trip possible to their customers, including increased staffing; cameras and other AI technology; and community mental health and crisis support specialists.

With this layered, multifaceted approach to transit safety and security, we are making progress—less than ¼ of one percent of serious crimes—such as homicide, assault, and robbery—occur on public transit. Moreover, transit safety and security are improving and crime on transit is declining. In 2025, total transit-related fatalities are down 16 percent; assaults on riders (injuries/fatalities) are down 18 percent; and assaults on workers (injuries/fatalities) are down 11 percent. More than 60 percent of agencies have not

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had a single major passenger security event, and more than 75 percent have not had an assault on a transit worker in the last six months.

Today, public transit represents only 1.4 percent of total highway/transit fatalities (i.e., 534 public transit fatalities of 37,174 total highway/transit fatalities). Accordingly, even modest increases in public transit ridership can cut traffic fatalities by 50 percent, and agencies work toward these goals each day.

With this context, as FTA considers establishing additional customer service metrics, APTA strongly encourages the agency to weigh the public benefit of having this information against the burden on public transit agencies to collect and report this information. Any new data collection effort must have a strong use case, and FTA must weigh the purpose and benefit of collection given the differing regional impressions and variants among transit agencies. Data reporting is difficult and resource-intensive, and any new data collection and reporting should have a clear benefit for agencies and the riders they serve.

In preparing our response to this RFI, APTA conducted a survey of its members on the service quality metrics outlined in the Family Friendly Transit notice. While APTA's survey found that many agencies are already collecting information on the service quality performance areas listed in the RFI, there may be limited benefits to comparing a snapshot of these metrics industry-wide across agencies. Many agencies, especially those that carry the most transit riders and survey customers at the most frequent intervals, do not ask standardized questions of customers. Imposing a national standard on those agencies could significantly disrupt their ability to analyze their own data over time, at a time when issues of customer perception are paramount. Furthermore, since customer survey data is dependent on a whole host of factors, such as the "perception of cleanliness" being linked to the newness of vehicles, comparing a snapshot in time of customer perception among agencies may provide limited value to the public.

In addition, FTA should outline a well-defined plan for how any such data would be used. Many transit agencies have adopted customer service metrics that have enabled them to focus resources on their highest local priorities and communicate their efforts to their unique constituencies. Agencies also utilize this data in reports to their Boards of Directors, which can then set specific objectives based on local needs, and publish the results of customer surveys and other data on their websites, increasing transparency of agency performance metrics. Given the local context of how data is collected and used, APTA does not believe that every customer service metric lends itself to reporting to the National Transit Database (NTD) or to be included in future iterations of the FTA's new [*Transit Moves America*](#) Dashboard.

Accordingly, APTA encourages FTA to determine, for each customer service metric, the best way to achieve its objective. Several of the issues FTA identifies might first be ripe for study by the Transportation Cooperative Research Program (TCRP), which has recently issued two reports dealing with specific aspects of transit agency customer service.¹ Other items might lend themselves to best practices shared among agencies. APTA would be happy to participate in developing and sharing best practices at its conferences, seminars, workshops, and committee meetings. Data collection and reporting, through the NTD or otherwise, should be required only for those instances where a strong use case has been identified, outlined to the public, and the agency has ensured proper notice and comment.

¹ See Transportation Cooperative Research Program, *TCRP Synthesis 187 Transit Agency Customer Experience Programs, A Synthesis of Transit Practice* (2026), and Transit Cooperative Research Program, Research Report 265, *Addressing Travel Needs of Women and Families on Public Transportation* (2026).

APTA offers the following specific comments below:

I. National Transit Database

In its RFI, FTA seeks comment on proposed service quality performance areas (i.e., safety and security, cleanliness, universal accessibility, real time service data, and system reliability); the effectiveness of leveraging existing NTD and oversight data; and whether FTA should consider collecting any new data through the NTD or by other means.²

As FTA notes, transit agencies currently report an enormous amount of data to the NTD, including safety and security events, compliance with the Americans with Disabilities Act (ADA), General Transit Feed Specifications (GTFS) schedule data for fixed route modes, geographic area coverage data for demand response, data related to disruption of service, and other information. At the same time, the FTA's Dashboard clearly shows how safe public transit is—out of one million public transit trips, fewer than one trip involved a major security event involving a passenger or transit worker. As noted above, more than 60 percent of agencies have not had a single major passenger security event, and more than 75 percent have not had an assault on a transit worker in the last six months.

Given the already heavy reporting burden on transit agencies, APTA urges FTA to weigh the necessity of requiring any additional data collection from transit agencies on these service quality metrics for reporting to NTD. First, the service quality data collected may not lend itself to comparability, given the unique characteristics of each agency's service, ridership culture, and local laws. Moreover, some service quality metrics, such as perception of cleanliness, are subjective and would not readily lend themselves to reporting, nor provide the ability to compare a system to like systems. Last, the cost burdens associated with data collection and reporting should not be underestimated. If FTA is inclined to move toward reporting of customer service data, it should make tools and resources available to transit agencies.

II. Service Quality Performance Areas

A. Safety and Security

FTA requests information on whether transit agencies collect data from riders regarding perceptions and experiences of transit system safety and security, and how transit agencies analyze and use this data.³ In short, APTA members use several tools to gauge perceptions of safety and security on their systems, including real-time or periodic surveys of riders, call centers, complaint forms, transit ambassador feedback and trip planning apps. Over 72 percent of APTA members surveyed stated that they assess customer perception of safety and use the data to benchmark progress and guide mitigations. In addition, agencies share this data with the public on their websites, during briefings to their Boards of Directors, local departments of public safety, community partners, and others to help focus resources where they are needed most.

In 2025, APTA launched the Safe, Effective, and Clean Transit (SECURE) Task Force, to highlight best practices and ongoing efforts of public transit agencies and businesses across the country to deliver safe,

² 91 Fed. Reg. 33895.

³ *Id.*

clean, and reliable public transportation for employees and passengers. Rider-focused investments to improve service, safety, and accessibility are why ridership is increasing across the country. For example, to address transit safety concerns, agencies are adopting a layered approach, increasing the number of law enforcement personnel, and supporting them with “transit ambassadors”, mental health professionals, and public awareness campaigns.

Agencies’ efforts are paying off, and both safety and customer perception of safety are improving. One major transit system noted in its annual service report that customer perception of safety improved by eight percentage points over a two-year period. Another agency saw a 16-percentage point increase in the number of survey respondents that feel safe on both their trains and at light rail stations.

Given transit agencies’ commitment to safety and security, and the significant amount of safety data already reported to the NTD,⁴ APTA does not believe additional safety data collection is necessary.

B. Cleanliness

FTA seeks information on what data agencies collect regarding cleanliness of transit systems, including vehicles and facilities, as well as methodologies used to define or assess cleanliness.⁵ APTA’s survey found that 87 percent of public transit agencies track cleanliness using several methods including surveys, mobile apps, or QR codes that allow riders to report cleanliness issues in real time. This real-time reporting allows transit agencies to fix problems immediately, and to set future initiatives for customer satisfaction. Agencies also use cleanliness data key performance indicators (KPIs) from their customer surveys to evaluate contractor performance.

APTA strongly discourages FTA from adopting any nationwide standard on cleanliness, as it would be a highly subjective undertaking. Cleanliness or perception of cleanliness may be dependent on several factors including the age of vehicles or facilities, sartorial choices of riders, behavior, or condition of personal belongings. It would be a very difficult task for FTA to compare the cleanliness of a 100-year-old legacy rail system to a brand-new light rail system in a community of limited size.

Given the subjective nature of perception of cleanliness as a service metric, APTA believes that this issue is best dealt with locally and not nationally.

C. Universal Accessibility

Regarding accessibility, FTA states that it is considering assessing performance beyond the minimum requirements of the ADA and is also interested in the extent to which transit agencies collect and use data regarding accessibility of transit systems beyond the minimum ADA requirements.⁶

APTA’s survey found that more than 80 percent of agency respondents offer travel training for individuals with disabilities. Seven in 10 rail agencies allow non-folded strollers on board vehicles, and a growing number of bus agencies (40 percent) have the same policy.

⁴ Large transit agencies must report safety and security data to NTD annually as part of their FTA grant compliance obligations, as well as establish up to 66 performance targets as part of their Public Transportation Agency Safety Plans.

⁵ 91 Fed. Reg. 33895.

⁶ *Id.*

APTA urges FTA to refrain from imposing any new standards or requirements that are not in law or regulation, and which could create unfunded costs for agencies. APTA members suggest that FTA focus first on data already collected through census or otherwise, such as population served by accessible stations, and existing accessibility-related service data before it considers whether to require reporting of any additional information. As noted above, data reporting is difficult and resource-intensive, and any new data collection should have a clear benefit for agencies and riders. In addition, there must be a well-defined plan for how any such data would be used. This is especially true for smaller agencies, which have staffing limitations and considerable resource constraints.

In addition, accessibility is often dictated by parameters outside of an agency's control, including sidewalks, curb cuts, accessible pedestrian signals, municipal rights-of-way, and paths of travel to stops or stations. Inaccessible municipal infrastructure can drive paratransit demand even when transit service itself is accessible. APTA suggests that FTA work with other DOT modal administrations to ensure a comprehensive approach for providing accessible rights-of-way to further advance ADA goals.

D. Real-Time Service Data Availability

FTA seeks comment on the extent to which agencies make real-time service data available to customers to support trip planning, including service disruptions, and is interested in leveraging existing data protocols based on industry standards for geographically based transit service information, such as GTFS.⁷

As FTA notes, it collects extensive GTFS schedule information for fixed route modes as well as geographic area coverage data for demand response service through NTD. APTA's survey found that almost all transit agencies provide real-time travel information to customers, including arrival times; delays, detours, and other service issues; and other updates to ensure customers can plan their trips accordingly.

Many large transit agencies provide publicly accessible real-time feeds in the GTFS-RT format, allowing for analysis of delivered service conditions. In addition, data aggregators such as Transitland and MobilityDatabase maintain links to several agency feeds. APTA member agencies provide these real-time feeds so that a wide variety of app developers and community members can provide useful tools for riders and the public. However, some smaller agencies that have real-time information and tools produced by vendors for rider use may not have the budget or internal expertise to provide a public feed for information.

E. System Reliability

FTA seeks input on how on-time performance is assessed by transit agencies, including methods and technology used, and how successful on-time performance is defined.⁸

Public transit agencies measure on-time performance in several ways. They use data from vehicle location systems (the same systems that provide real-time arrival information to riders) to compare the service delivered to the scheduled service. This mechanism allows agencies to monitor operator performance as well as identify when outside factors such as traffic along a route are impacting the schedule. Agencies also ask customers about their perception of the agency's on-time performance, to understand how riders

⁷ *Id.*

⁸ *Id.*

experience their service. APTA's survey found that 95 percent of transit agencies ask customers to rate their on-time performance.

According to the TCRP report, *Addressing Travel Needs of Women and Families on Public Transportation*, "many transit agencies capture service reliability via an on-time performance metric that considers a trip 'on-time' if its actual arrival time is between 1 minute before and 4 to 5 minutes after the scheduled arrival time."⁹ TCRP sampled a number of agencies and found that it was not uncommon for agencies to use different percentages to assess an on-time performance target.

APTA suggests that given the varying nature of how reliability is assessed across transit agencies, a comprehensive national survey or review may be needed to better inform any future actions on this critical service dimension.

III. Conclusion

Accordingly, APTA encourages FTA to determine, for each customer service metric, the best way to achieve its objective, including using the TCRP to conduct future research, best practices shared among agencies, and data collection and reporting only for those instances where a strong use case has been identified and FTA has ensured proper notice and comment.

We appreciate the opportunity to comment on FTA's Family Friendly Transit RFI and APTA members share the common goal of ensuring safe, clean and efficient transit systems. If you have questions regarding this letter, please contact Stacie H. Tiongson, Senior Director, Government Affairs and Advocacy (stiongson@apta.com), or Taria Barron, General Counsel (tbarron@apta.com).

Thank you for your consideration. We look forward to continuing to work with you on these important issues.

Sincerely,



Paul P. Skoutelas
President and CEO

⁹ Transit Cooperative Research Program, Research Report 265, *Addressing Travel Needs of Women and Families on Public Transportation*, at 17 (2026).