



**AMERICAN
PUBLIC
TRANSPORTATION
ASSOCIATION**

June 10, 2019

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

EXECUTIVE COMMITTEE

CHAIR

David M. Stackrow, Sr.

VICE CHAIR

Nuria I. Fernandez

SECRETARY-TREASURER

Freddie C. Fuller II

IMMEDIATE PAST CHAIR

Nathaniel P. Ford, Sr.

Doug Allen

Dorval R. Carter, Jr.

Francis "Buddy" Coleman

David A. Genova

Huelon A. Harrison

Carol Herrera

Kevin J. Holzendorf

Karen H. King

Jeanne Krieg

Thomas C. Lambert

Adelee Marie Le Grand

Jack Martinson

Diana C. Mendes

Brad Miller

Greg Percy

Allan Pollock

Leanne P. Redden

William T. Thomsen

Jeffrey Wharton

PRESIDENT AND CEO

Paul P. Skoutelas

RE: FTA- 2018-0010

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) Notice of National Transit Database Reporting Changes and Clarifications on April 9, 2019 at 84 FR 14189.

About APTA

APTA is a nonprofit international association of 1,500 public and private sector organizations representing a \$71 billion-dollar industry that directly employs 430,000 people and supports millions of private sector jobs. APTA's member organizations include 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.

General Comments

APTA is grateful for the opportunity to provide this input and it has surveyed its members to develop the following comments regarding FTA's National Transit Database (NTD) Reporting Changes and Clarifications. Members are most concerned about FTA's proposal surrounding transportation network companies (TNC) and automation. Of utmost importance is that reporting continues to be done by transit agencies and not TNCs. Overall, transit agencies are discovering ways to serve the public better and more efficiently by contracting with TNCs to provide service in low density areas, in late-night service, and for certain demand-response services. NTD reporting entities should report data for TNC trips that are part of official public transportation service plans. All funding generated by such NTD data should go the designated recipient to be used for anything in the Program of Projects without restriction. Further, while FTA's proposal to include "TN" and "TX" is an improvement, the proposal focus on motorized vehicle trip is to the detriment of other modes such as bike share or scooter share programs that are healthier and more sustainable. Transit agencies should be able to report and receive credit for those partnerships and any changes to the NTD should encourage those partnerships.

FTA– 2018–0010

June 10, 2019

Page 2

In addition, the “passenger route miles” associated with TNC trips connected to transit should be taken into account in the apportionment of transit funding. The “revenue vehicle miles” associated with TNC trips connected to transit should not. Finally, the notice also requests comment on how automated bus service data should be reported to NTD. Such services should be reported as “Fixed-Guideway Route Miles” only to the extent they operate in a dedicated right-of-way.

We appreciate the opportunity to assist FTA in this important endeavor. For additional information, please contact Linda Ford, APTA’s General Counsel, at (202) 496-4808 or lford@apta.com.

Sincerely yours,

Paul P. Skoutelas
President & CEO