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September 6, 2022

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Paul P. Skoutelas

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

Re: FTA-2022-0018

Dear Docket Clerk:

The American Public Transportation Association (APTA) represents an \$80 billion industry that directly employs 450,000 people and supports millions of private-sector jobs. We are pleased to offer comments regarding the Federal Transit Administration's (FTA) National Transit Database Reporting Changes and Clarifications published in the *Federal Register* at 87 FR 40582 on July 7, 2022.

FTA's National Transit Database (NTD) is a valuable resource for the public transportation industry. When FTA (as UMTA) began collecting data for the NTD over 40 years ago, its efforts were informed by APTA's history of collecting operating data from public transit agencies in the form of the APTA Annual Operating Reports. In the past 15 years, FTA has made great progress in expanding the breadth and depth of the NTD's data, increasing its value to the industry.

While APTA and its members appreciate the constant attention to bettering NTD offerings, some aspects of the proposed changes to NTD reporting have raised concerns.

After discussions with APTA members, we submit the following comments:

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New Sample-Based Monthly Data (WE-20)

FTA proposes collecting data from “a sampled subset of 400 NTD reporters.” Currently just over 500 NTD reporters participate in the NTD monthly reporting (MR-20), so this would represent a large portion of NTD reporters. Some of those reporters find it difficult to provide fully verified data within the current timeframe of the NTD monthly reporting. This proposal reduces the turnaround time to just three business days. This deadline will be difficult for many NTD reporters to meet.

FTA proposes that agencies report Unlinked Passenger Trips (UPT) and Vehicle Revenue Miles (VRM) as part of WE-20. Agencies that can easily collect station entries (linked trips) but have to further analyze these data to produce unlinked trip figures will find it even more difficult to meet the three business days deadline. If FTA were to accept station entries/linked trips as an alternative data format, that would still meet FTA’s use of the data by enabling a trendline comparison over time.

The proposal for sample-based monthly data does not specify how FTA plans to use these sample data, or the timeframe of when the results will be published.

General Transit Feed Specification (GTFS)

FTA proposes requiring all NTD reporters to provide static GTFS feeds in order to meet the requirement in the IJA for collecting “geographic service area coverage” data. There are several barriers that NTD reporters will face in fulfilling this requirement. First, some agencies have entered into contracts that prevent them from sharing their GTFS feed data publicly.

Second, many smaller transit agencies without GTFS feeds do not have the resources to develop these datasets internally. The National Rural Transit Assistance Program (RTAP) does provide a free GTFS Builder tool; however, RTAP estimates four hours of work per route to build a GTFS file and assumes familiarity with excel, Google Maps tools, and Google Earth. Additionally, assistance from RTAP is limited to those NTD reporters that receive \$5311 funding. Staff time and expertise will present a significant barrier for smaller NTD reporters already experiencing staffing shortages.

Collecting Geospatial Data for Demand Response Modes

FTA proposes collecting demand response spatial data via a series of questions. For larger agencies, the task of listing every census designated place and whether they are partially or wholly served by demand response transit would be a major undertaking. FTA should consider alternatives like geospatial files for this requirement.

For smaller agencies, providing detailed information by census designated place will be time consuming for strained staff. FTA should consider requesting county-level data for reporters who cannot provide a geospatial file.

Emergency Contact Information

APTA supports this change.

Vehicle Fuel Type

APTA supports this change.

APTA appreciates the opportunity to comment on this request for comments. If there are any questions regarding this letter, please contact APTA's General Counsel, Linda Ford at lford@apta.com.

Sincerely yours,

A handwritten signature in black ink that reads "Paul P. Skoutelas". The signature is written in a cursive, flowing style.

Paul P. Skoutelas
President and CEO