



June 16, 2020

The Honorable Peter DeFazio, Chair  
The Honorable Sam Graves, Ranking Member  
Committee on Transportation & Infrastructure  
U.S. House of Representatives  
Washington, DC 20515

Dear Chairman DeFazio and Ranking Member Graves:

The Denton County (TX) Transportation Authority (DCTA) is pleased that your committee has started consideration of a reauthorization of the 2015 FAST Act and we believe that the recent introduction of the INVEST in America Act (HR 2) represents a strong start to that process.

Like many of our colleagues across the country, DCTA is experiencing significant losses of revenue both through lower farebox recovery and sales tax revenues due to the COVID-19 pandemic. We are pleased that HR 2 recognizes this and provides resources for these immediate needs. In addition, the INVEST Act includes proposed funding increases for public transit formula programs over the next five years and initiatives that will assist in our efforts to lower greenhouse gas emissions in the North Texas region. This would represent an important contribution to our local efforts to maintain and grow transit services for our increasingly transit-dependent ridership.

However, we are concerned, along with APTA and our transit peers, with Section 2203, Mobility Innovation. Section 2203 of the bill is considerably different from APTA's Mobility and Innovation proposal and could seriously inhibit mobility innovation in the transit industry. It permits transit agencies to use section 5307 and 5310 formula funding, which DCTA currently uses, for mobility on demand (MOD) and mobility as a service (MAAS) options. While the federal share for MOD projects is 80 percent, that federal share would be reduced by 25 percent if the recipient uses a third-party contract to perform the service. Being a broker of service and partnering with MaaS providers to deploy the most efficient and effective technologies are critical to staying relevant in the transportation sector. In addition, the federal share would also be reduced by 25 percent if the project involves the use of a vehicle that is not a zero-emission vehicle. The bill also includes a prohibition on the use of funds for any service considered a taxi service, which is highly concerning. These provisions dramatically negate DCTA's innovative approach to transit in response to our community's rapidly changing needs.

Moreover, section 2603 of the bill prohibits the use of formula funds for automated vehicles providing transportation unless the transit agency certifies to the Secretary that the deployment does not duplicate, eliminate, or reduce the frequency of existing service and develops and submits for approval to the Secretary a workforce development plan. In addition, if the transit agency proposes to deploy a MOD service, it must certify that the service meets the criteria of section 2203, as noted above. These workforce development requirements inhibit the types of innovative programs that transit agencies would like to deploy and also



stymie the ability of transit agencies to leverage their resources by using on-demand services such as Lyft to address certain routes, especially in cities that rely on our services to meet workforce transportation needs. This is particularly important for an agency like DCTA that operates in a primarily suburban, low-density environment where fixed-route transit is not always the best solution or the one desired by the community served.

We look forward to working with the T&I Committee and the Denton County congressional delegation on a FAST Act reauthorization that provides sufficient funding to assist with our services and policy changes to help us use our resources more efficiently. Please let us know if we can provide any additional information on how the Invest in America Act would benefit DCTA and our riders or about any of the concerns outlined herein.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kristina Holcomb", is written over a circular blue stamp.

Kristina Holcomb  
Deputy Chief Executive Officer

Cc: The Honorable Congressman Michael C. Burgess, MD