



September 21, 2015

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue S.E., W12-140
Washington, DC 20590-0001

RE: Docket No. DOT-OST-2015-0075

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 U.S. Department of Transportation (DOT) request for comments on the notice of petition for rulemaking on Transportation for Individuals With Disabilities; Service Criteria for Complementary Paratransit Fares, published on August 20, 2015 at 80 FR 50593.

About APTA

APTA is a non-profit international trade association of more than 1,500 public and private member organizations, including 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. More than ninety percent of Americans who use public transportation are served by APTA member transit systems.

General Comments

APTA fully supports Access Services' petition to affirmatively authorize its coordinated fare structure through amendment of 49 CFR 37.131.

The coordinated fare structure at issue has been employed by Access Services for more than 20 years. It facilitates travel for riders with disabilities across 44 jurisdictions without need for transfer or multiple fare transactions. It is supported by the riders who depend on the system and was accepted through several triennial review cycles by FTA auditors. It greatly simplifies fare collection and fare payment, while reducing costs for the vast majority of Access Services riders.

In short, Access Services' fare structure is equitable, supports the riders, and is supported by the riders. It is only logical that the regulation be amended to affirmatively allow continued employment of this fare structure.

Executive Committee

*Chair
Phillip A. Washington*

*Vice Chair
Valarie J. McCall*

*Secretary-Treasurer
Doran J. Barnes*

*Immediate Past Chair
Peter Varga*

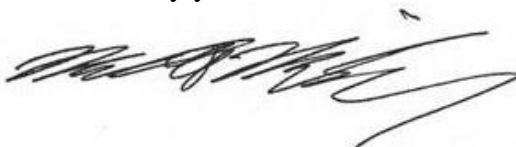
*Members-at-Large
Michael A. Allegra
Christopher P. Boylan
Nathaniel P. Ford Sr.
Huelon A. Harrison
Angela Iannuzziello
Paul C. Jablonski
Jeanne Krieg
Donna P. McNamee
Rosa Navejar
Keith T. Parker
Thomas F. Prendergast
Michael A. Sanders
Patrick J. Scully
Carl G. Sedoryk*

*President & CEO
Michael P. Melaniphy*

Docket Operations
September 21, 2015
Page 2

We appreciate the opportunity to assist DOT in this important endeavor. For additional information, please contact James LaRusch, APTA's chief counsel and vice president corporate affairs, at (202) 496-4808 or jlarsch@apta.com.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michael P. Melaniphy". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael P. Melaniphy
President & CEO

MPM/jpl:jr