



AMERICAN
PUBLIC
TRANSPORTATION
ASSOCIATION

May 15, 2017

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

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Richard A. White

RE: TSA- 2016-0002

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 Transportation Security Administration's (TSA) advance notice of proposed rulemaking (ANPRM) regarding security training for surface transportation vulnerability assessment and security plans, published in the *Federal Register* on December 16, 2016 at 81 FR 91401.

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.

General Comments

APTA has surveyed its member organizations seeking comments in response to the ANPRM and offers the following comments:

- The transportation security grant program ("TSGP") has helped to infuse transit police departments with added resources to enhance system security efforts. Unfortunately, TSGP has seen a decrease in funding over the past eight years. This means transit agencies are in a precarious state to continue with their efforts like their Transit Anti-Terrorism Team, K9 program, Active Shooter/Responding to Scenes of Violence and Emergency Management Services. The continuing resolution for the appropriation of funding for the FY2017 TSGP has put a significant strain on transit agencies' operational budgets. TSA must commit to an appropriate level of funding to ensure transit agencies can carry out the requirements of this regulation.

- TSA must also ensure that information collected from transit agencies is protected from freedom of information requests. Furthermore, by collecting this information will TSA develop a standardized methodology for assessing vulnerability? If so, will TSA allow transit agencies to weigh in on the standard methodology before requiring transit agencies to utilize the standard methodology?
- TSA must also be mindful of the costs to implement this regulation. TSA cannot use a national cost estimate because costs on either coast will be substantially more than in other areas of the country.

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

Sincerely yours,

A handwritten signature in black ink, appearing to read "Richard A. White". The signature is fluid and cursive, with the first name being the most prominent.

Richard A. White
Acting President & CEO

RAW/ph:lf