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PUBLIC  
TRANSPORTATION  
ASSOCIATION

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

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**PRESIDENT & CEO**

Richard A. White

**Re: FTA–2017–0010**

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 National Transit Database Reporting Changes and Clarifications published on October 27, 2017 at 82 FR 49929.

**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 is pleased to see these clarifications, changes and guidance to National Transit Database (NTD) reporters. The NTD is a key and growing repository of transit industry financial, operating and asset condition information used to apportion billions of Federal Transit Administration (FTA) funds to over 850 agencies and to report to Congress on the state of the nation's transit services. Increasingly, transit agencies are incorporating benchmarking into their performance management programs to help leaders, governing boards and stakeholders understand how their performance compares to peers. The NTD serves as a vital source of data for this exercise, as reaching out to individual agencies is time consuming and cumbersome.

Historically, the NTD collected basic asset information from transit agencies as part of transit agencies' annual reports. Going forward, much more detailed information on facilities, passenger stations, revenue vehicles, service vehicles, equipment, and guideway will be collected. APTA has identified the following area of concern related to asset inventory information that our members would like addressed in the final update.

## **B. Clarifications on Reporting Requirements Related to the Transit Asset Management Program**

As stated in B. 3(c), “The new track inventory form, which will be implemented in report year 2018, includes two track types: Tangent and curve. Agencies are asked to report a sum of all track in these two categories”. APTA believes there is no added value to differentiate tangent and curved track because the physical assets/components are exactly the same, albeit for guarded curves where there is restraining rail. Separating these track types for reporting purposes only adds costs to data collection and reporting without adding value to transit agencies or the FTA. If curves are included as a reportable asset category, FTA should specify the degree of curvature.

Instead of track types, APTA strongly recommends that the physical layout should drive asset definition. More useful categories of track from an agency asset inventory perspective are:

1. mainline track work,
2. special track work (to include guarded curves, switches, crossovers, grade crossings, rail crossings, and other elevated guideway), and
3. yard/secondary track work.

Special track work should be a stand-alone element. The components in special track work are unique and different than mainline track. Other elevated guideway, for example, might include bridges with substructures of other materials, such as brick or stone. APTA believes that physical layout better captures reportable assets and encourages FTA to use the categories enumerated above in NTD for new track inventory form.

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

Sincerely yours,



Richard A. White  
Acting President & CEO