



AMERICAN
PUBLIC
TRANSPORTATION
ASSOCIATION

November 30, 2017

Office of the Managing Director, MD-1
Strategic Management Program
National Transportation Safety Board
490 L'Enfant Plaza SW
Washington, DC 20594

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Richard A. White

Re: Comments on NTSB 2018-2022 Draft Strategic Plan

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 Transportation Safety Board (NTSB) Fiscal Year (FY) 2018-2022 Strategic Plan from December 2017. We appreciate this opportunity to comment.

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

- Page 7 of the Strategic Plan document, paragraph 2 under “History”, last sentence, APTA would like NTSB to consider adding “public transportation” or “transit” under the list of modes for which the NTSB has investigated accidents. With this change, it would read: “Since 1967, the NTSB has investigated accidents in the aviation, highway, marine, pipeline, railroad and public transportation modes...” This is due to the fact that NTSB has investigated specific public transportation accidents in the past (and not just railroad accidents, as this would refer mainly to Class 1 railroads). APTA feels as though this addition would better delineate out the specific subway, commuter rail, and light rail accidents for which the NTSB has investigated in the past.
- Page 20 of the Strategic Plan document, paragraph 2 under “Internal and External Consultation,” first sentence should read “In preparing this plan...” (spelling error for “plan” instead of “pan”).

- APTA would like NTSB to consider providing a projection of costs in its recommendations, when feasible and possible. This would assist transit agencies, commuter rails agencies, and others in better financing the recommended safety implementations put forward by the NTSB.
- In terms of metrics and timelines, APTA would like to know how this plan will be measured? APTA feels as though there are very few specifics and deadlines in the plan, so we would like to know if the Strategic Plan can be a bit more specific on measurement and deadlines. For example, in the Appendix on Page 21 of the Strategic Plan it states, “Create Plans and Performance Metrics” under Phase 3, so we would like to see some of these additional Performance Metrics laid out.
- APTA would like to know how the timeframe for a 4-year cycle was chosen, especially because we are already into FY 2018 at the moment. As the Federal fiscal year starts on October 1, 2017, it would mean that we’re already into FY 2018, so why are we commenting on a Strategic Plan for which the fiscal year has already started? Therefore, shouldn’t this plan be starting in FY 2019 instead of FY 2018?

We appreciate the opportunity to assist the NTSB in this important endeavor. For additional information, please contact Linda Ford, APTA’s General Counsel, at (202) 496-4808 or lford@apta.com or Brian Alberts, APTA’s Director of Safety, at (202) 496-4885 or balberts@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