

January 3, 2013

Administrator Peter Rogoff
Federal Transit Administration, East Building
1200 New Jersey Avenue S.E. 5th Floor, Suite E-57
Washington, DC 20590

Re: MAP-21 Asset Management Provisions

Dear Administrator Rogoff:

Following the passage of the federal transportation legislation – Moving Ahead for Progress in the 21st Century (MAP-21) in July, 2012, the American Association of State Highway & Transportation Officials (AASHTO) established a Task Force to analyze and make recommendations relating to the Federal Transit Administration (FTA) provisions of the legislation. Asset Management is a key area in which the Task Force makes recommendations to FTA for purposes of implementation.

AASHTO's Standing Committee on Performance Management in November 2012 released its Task Force Findings on National-Level Performance Measures. In developing the recommended measures, the Task Force has been guided by six overarching principles on how national performance measures should be developed and implemented. These six principles are as follows:

There is a Difference - National-level performance measures are not necessarily the same performance measures State DOTs will use for planning and programming of transportation projects and funding.

Specificity and Simplicity - National-level performance measures should follow the SMART and KISS principles:

- SMART - Specific, Measurable, Attainable, Realistic, Timely
- KISS - Keep it Short and Simple

Possession is 9/10ths of the Law - National-level performance measures should focus on areas and assets that States DOTs have control over.

Reduce and Re-use - The initial set of national-level performance measures should build upon existing performance measures, management practices, data sets and reporting processes so that transit assets can be queried uniformly across all states, by all transit stakeholders.

Ever Forward - National-level measures should be forward thinking to allow continued improvement over time.

Communicate, Communicate, Communicate - Messaging the impact and meaning of the national-level measures to the public and other audiences is vital to the success of this initiative.

Asset Management Provisions (5326) of MAP-21 – Standing Committee on Public Transportation’s Principles

AASHTO’s Standing Committee on Public Transportation has also established a Task Force of Transit Directors from the state departments of transportation, and has looked closely at the focus area of Asset Management. It should be noted that transit asset management, transit safety and state of good repair are all linked. Tying asset management to safety and state of good repair will raise the level of importance FTA can place on the concept of rural asset management. To this end, we would like to propose the following principles. We offer these principles as part of the National Dialogue that FTA has sponsored and request the opportunity to work together with FTA staff to explore these principles in more detail and establish a common foundation on which to build those portions of the rulemaking that will pertain to the rural transit infrastructure.

The rural transit assets are relatively simple in comparison to the urban transit assets, with the rolling stock (buses and vans) representing the most significant portion of the assets. Urban transit systems that include infrastructure-heavy assets such as rail and Bus Rapid Transit (BRT) systems are responsible for maintaining the infrastructure in addition to the rolling stock. Also, rural transit assets generally are not as old as urban system assets (especially those of legacy rail systems) and, overall, rural transit assets represent a very small portion of the nation’s transit assets. Couple these two factors with the need to roll out federal standards and requirements to over twice as many providers, and it becomes clear that, for the rural systems, the asset management provision of MAP-21 should be implemented in a very basic and straightforward way that limits the regulatory burden on these small systems.

- 1) MAP-21 Asset Management planning, target setting, monitoring and reporting requirements placed on the rural system should be limited to the most critical and significant portion of the rural transit assets: revenue vehicles and buildings used to repair or maintain revenue vehicles.
- 2) A phased approach should be taken, such as:
 - a) Initially FTA asset management requirements should be limited to keeping track of numbers of revenue vehicles and simple data for those vehicles (such as age and miles), plus simple data on buildings used to maintain or repair revenue vehicles (perhaps the age of major facility components, such as roof, pavements, HVAC).
 - b) After electronic asset management systems are in place for all State DOT subrecipients, FTA and the states can, if appropriate, assess the need and feasibility of expanding to additional asset classes and to additional condition data.
- 3) For the rural infrastructure, the best approach might be for a single statewide plan that meets the requirements for both the state as a recipient and all of their subrecipients to be submitted with statewide information. Minimum plan requirements might consist of:
 - a) The state agency’s approach to Asset Management, including a summary of the requirements the State places on its subrecipients and how the state monitors compliance.
 - b) A statewide summary of the rural transit assets (i.e. revenue vehicles and maintenance/repair facilities for them) to include:
 - i) Number of items in these two categories.
 - ii) Number of subrecipients that possess assets in each category.
 - iii) Average Condition within each category.
 - (1) For rolling stock classes, vehicle mileage and vehicle age.
 - (2) For revenue vehicles and buildings used to repair or maintain revenue vehicles.
 - (3) For informational purposes, the federal funds needed (assuming the applicable federal share) on a statewide basis to replace those revenue vehicles and revenue vehicle maintenance/repair facilities that have already reached or will reach the end of their useful lives within next five years.
- 4) Use the National Transit Data Base (NTD) for submission of all data. Most states already submit asset data to the NTD on behalf of section 5311 program subrecipients. That approach of allowing the state to submit the

data should be continued. While we want to continue to use NTD as the reporting process, we would like to explore the pros and cons of having the data submitted to the NTD for subrecipients be aggregated by a statewide submission – as opposed to system by system - that reflects the overall condition of all rural assets within a state, rather than reports on individual subrecipient data. (We would like to look for ways to make NTD more user-friendly such as the ability to access and compile data on a state by state level.)

- 5) New assessment management requirements placed on federal recipients as a result of MAP-21 should take into consideration that federal recipients are already obligated to provide for continuing control of federally funded assets. The states are already obligated to maintain control over real property, facilities, and equipment; ensure that they are used in transit service and are kept in good operating order. Therefore, if we take the approach of statewide plans and statewide data being reported to FTA, states will need to collect asset management data and plans from each of its subrecipients in order to meet both the MAP-21 requirements and their ongoing continuing control obligations. States should continue to be able to collect and manage this data to meet their obligations as they see fit as long as they are meeting the FTA continuing control requirements and asset management reporting requirements. Each state’s overall asset management/continuing control practices will be monitored by FTA using their routine State Management Review process.
- 6) Allow recipients to use 49 USC 5305 planning funds for implementation of asset management requirements.
- 7) Any definition of “state of good repair” and projections on funding needed to maintain assets in a SOGR should be for informational purposes, not programming and budget purposes. If a vehicle can be operated safely, the SOGR definition should not preclude that.

Your leadership in sustaining a strong federal partnership with states and public transportation systems has been unparalleled. AASHTO appreciates the opportunity to work with FTA on the implementation of MAP-21 and your consideration of our views.

Sincerely,



John Horsley
Executive Director, American Association of State Highway and Transportation Officials



Shailen Bhatt
Secretary, Delaware Department of Transportation
Chair, AASHTO Standing Committee on Public Transportation