

September 9, 2013

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

Re: Docket No. FTA-2013-0026

Dear Administrator Rogoff:

The American Association of State Highway and Transportation Officials (AASHTO) appreciates the opportunity to submit comments on FTA's "Enhanced Mobility for Seniors and Individuals with Disabilities: Proposed Circular," which was released on July 11, 2013.

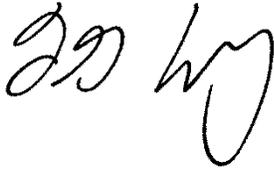
In the spirit of providing guidance and technical expertise on behalf of the states, AASHTO proposes the following recommendations for your consideration.

Formula grants for the Enhanced Mobility of Seniors and Individuals with Disabilities (5310)

- To the maximum extent possible, designated recipients within a state should have the ability to implement the section 5310 program on a statewide basis.
- For purposes of the coordination plan, a project should be defined as a strategy, activity or specific action addressing an identified gap or transportation coordination objective articulated and prioritized with the plan. The phrase "strategy, activity or specific action" should be used instead of the word "project" throughout this section of the circular. In addition, the phrase "included in" should be defined to mean listed in or supported by the plan."
- On April 29, 2009, the FTA issued a notice in the *Federal Register* that expanded the types of projects it considers to be "beyond the ADA" for New Freedom funding. In line with this guidance, eligible New Freedom projects should continue to be interpreted as new and expanded fixed route and demand response transit service planned and designed to meet the needs of individuals with disabilities.
- We do not support combining all of the *performance measure related* and *asset and inventory reporting* requirements into a single NTD reporting requirement for the Section 5310 or the Section 5311 program. Section 5310 NTD reporting should be narrow in scope and limited to data directly and exclusively related to "transit asset inventory or condition assessment conducted by the recipient." We also recommend consideration be given to Section 5310 data being "rolled-up" and reported to NTD at the designated (not sub-) recipient level.

We appreciate the opportunity to provide these comments and look forward to working with FTA in developing final guidance. If you would like to discuss the issues raised in this letter, please contact Shayne Gill, AASHTO's Program Manager for Aviation, Passenger Rail & Public Transportation at (202) 624-3630.

Sincerely,

A handwritten signature in black ink, appearing to read "Bud Wright".

Bud Wright
Executive Director, American Association of State Highway and Transportation Officials

A handwritten signature in blue ink, appearing to read "Shailen Bhatt".

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