



October 9, 2015

Honorable Therese McMillian
Acting Administrator, Federal Transit Administration
U.S. Department of Transportation
1200 New Jersey Avenue S.E.
Washington, DC 20590

Subject: Docket No. FTA-2015-0009

Dear Administrator McMillan,

The Montana Department of Transportation (MDT) respectfully submits the following comments on the Federal Transit Administration's (FTA) Public Transportation Safety Program published in the Federal Register on August 14, 2015. MDT is a strong supporter of safety in regards to public transportation. However, excessive regulatory and implementation requirements for small urban and rural bus systems would create a hardship on our subrecipients who have limited staff that are already required to handle multiple tasks.

In developing the framework for the Public Transportation Safety Program please take the following recommendations into consideration.

1. Requirements should be relevant and scaled to rural and small urban transit size systems.
2. Allow states the flexibility to implement the requirements within an SMS framework that fits for Montana.

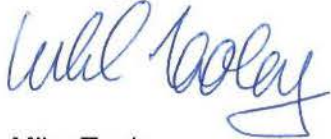
We recognize that FTA understands that a one size fits all approach is not feasible for rural and small urban systems. However, MDT continues to have concerns that the SMS framework that was initially developed for large urban rail systems will be scaled but not necessarily relevant for systems that have only two buses in their communities. If the regulations are not relevant then Montana's transit providers will be forced to comply with requirements that are burdensome, costly, and will detract from providing excellent customer service to the citizens in their communities. In some cases this could result in a loss of ridership and possibly losing valuable transportation services in rural areas of Montana that have no other services.

MDT urges FTA to consider allowing states the flexibility to develop a single statewide safety plan that covers all of its rural subrecipients and still provides a high level of safety. For MDT to provide the appropriate oversight a single statewide safety plan would be essential for program consistency.

As a member of the American Association of State Highway and Transportation Officials (AASHTO) we have invested staff time into developing the comments filed by the AASHTO Standing Committee on Public Transportation (SCOPT). MDT supports their position and recommendations on FTA's proposed Public Transportation Safety Program.

MDT appreciates your consideration in the comments we provided. If you have any questions or would like to discuss the comments further please contact Lynn Zanto at 406-444-3445 or lzanto@mt.gov.

Sincerely,

A handwritten signature in blue ink that reads "Mike Tooley". The signature is written in a cursive, flowing style.

Mike Tooley
Director

Copies: Lynn Zanto, Rail, Transit & Planning Division Administrator
Audrey Allums, Grants Bureau Chief
David Jacobs, Transit Section Supervisor
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