



November 24, 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-2014-0020

Dear Administrator McMillan,

The Montana Department of Transportation (MDT) respectfully submits the following comments on the Federal Transit Administration's (FTA) Transit Asset Management proposed rule published in the Federal Register on September 30, 2015.

As a member of the American Association of State Highway and Transportation Officials (AASHTO), We have invested extensive staff time into the development of the AASHTO comments filed on the docket and provide our general support for these comments. MDT also fully endorses the comments filed jointly by the state transportation departments of Idaho, Montana, North Dakota, South Dakota, and Wyoming. With that said, we want to ensure preservation of a state administered, federally assisted program, preservation of state flexibility in delivering its programs, and limiting burden on states as FHWA works thru the MAP-21 rulemaking process. The following comments are provided with these principles in mind.

MDT is a strong supporter of managing capital assets to a state of good repair that will improve safety and increase performance. However, it is imperative that the regulatory and implementation requirements for small urban and rural bus systems don't create a hardship on our subrecipients who have limited staff that are already required to handle multiple tasks.

In developing the framework for Transit Asset Management (TAM) please take the following recommendations into consideration.

1. Eliminate Section 5310 funding from TAM Plan requirements.
2. Allow for reduced requirements for Section 5311 rural transit systems.

The section 5310 subrecipients in the state of Montana are predominantly non-profit human service organizations whose primary business is not transit. These subrecipients use their vehicles to provide rides for their specialized clientele rather than the general public. Most of Montana's section 5310 subrecipients have only 1 or 2 buses in their entire fleet. The current TAM NPRM would require all section 5310 subrecipients follow the same requirements as a system with 100 buses. It is unrealistic to assume that they would need a plan as

comprehensive as a system with 100 buses. Section 5310 subrecipients need to be excluded from this regulation or at a minimum have simplified plan requirements.

Montana is a very rural state that is large in size and low in population. All of our transit providers would be considered very small bus operators compared to many states across America. Our largest section 5307 transit system in the state has 31 buses in revenue service. However, the majority of our section 5311 general public systems average around 10 buses. All of the operators in the state have minimal staff that serve many roles in their day to day operations and are not able to take on the burden or costs of administering a comprehensive asset management plan that is truly directed toward larger systems. MDT urges FTA to reduce the requirements for rural transit systems that have a minimal number of assets.

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 Transit Asset Management guidance.

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,



Mike Tooley
Director

copies: Lynn Zanto, Rail, Transit & Planning Division Administrator
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