

DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

JUSTIFICATION STATEMENT

National Transit Database 49 U.S.C. Section 5335(a), (b)

OMB Control No. 2132-0008

ABSTRACT

The National Transit Database (NTD) was established by Congress to be the Nation’s primary source for information and statistics on the transit systems of the United States. Recipients of grants from the Federal Transit Administration (FTA) under the [Urbanized Area Formula Program](#) (§5307) or [Other than Urbanized Area \(Rural\) Formula Program](#) (§5311) are required by statute to submit data to the NTD. Annual NTD data are submitted to Congress as part of a joint DOT report entitled “Status of the Nation’s Highways, Bridges, and Transit: Conditions and Performance” summarizing transit service and safety data. The latest version can be found online <http://www.fhwa.dot.gov/policy/2013cpr/pdfs.htm>.

This supporting statement is associated with a request for revision of a currently approved information collection. The change in this collection reflects an increase in the number of respondents from 842 to 2,272 due to FTA’s inclusion of additional rural transit reporters to the NTD reporting requirements. In addition, the increase in burden hours from 238,100 in 2012 to 302,400 in 2015 is as a result of these additional reporters and FTA’s ability to more accurately capture the number of hours required to successfully submit NTD report.

A. Justification

1. Circumstances that make the collection of information necessary.

The National Transit Database (NTD) system is a statutory requirement. 49 U.S.C. 5335 requires the Secretary to “maintain a reporting system, using uniform categories to accumulate public transportation financial, operating, and asset condition information using a uniform system of accounts.” Additionally, 49 U.S.C. 5335(b) specifies that the Secretary may award grants under the Federal Transit Administration’s Urbanized Area Formula Program or Rural Area Formula Program (Sections 5307 and 5311) “only if the applicant and any person that will receive benefits directly from the grant are subject to the reporting and uniform systems.” The NTD is the reporting system established to meet this requirement. By defining a national set of performance and financial metrics that are reported across the industry according to a standard set of rules, the NTD provides a common data vocabulary for evaluating and understanding public transportation issues.

NTD data are used by multiple external stakeholders. NTD data are used by State and local governments, as well as individual transit agencies, to conduct performance benchmarking among peer transit systems. NTD data are also frequently used by academic researchers seeking to improve public transportation systems. NTD data are key components of the American Public Transportation Association’s Annual Factbook and data on capital assets. Time series of NTD data are frequently used by suppliers of transit equipment and services to evaluate market trends and by government at all levels to guide transit investment decisions.

NTD data are used in statutory formulas for awarding grants. Urbanized Area Formula Grants have been apportioned on the basis of NTD data ever since the Surface Transportation Assistance Act of 1982 (STAA) established the first funding formulas for Fiscal Year 1983. Funding formulas have since also been established for the State of Good Repair Formula Program. These formulas are specified in 49 U.S.C. 5336 and 49 U.S.C. 5337, and rely upon NTD data. Rural Area Formula Grants and Tribal Transit Formula Grants have both been apportioned on the basis of NTD data since the Moving Ahead for Progress in the 21st Century Act (MAP-21) established the current formulas in 2012 for use in Fiscal Year 2013.

FTA also uses NTD data to inform its decision-making in the evaluation of applications for discretionary grants.

NTD data are used to report to Congress on the condition and performance of the nation’s transit systems: 49 U.S.C. 308(e) requires the Secretary to report “on the current performance and conditions of public mass transportation systems.” This report is commonly referred to as the *Conditions and Performance Report to Congress*. The NTD is an essential source of this performance data, allowing FTA to report on overall ridership, transit capacity, and transit operating efficiency. Capital asset data collected through the NTD also underpins the Transit Economic Requirements Model (TERM), which is used to estimate the nation’s transit investment needs for the next twenty years, a key component of this report. FTA could not complete this report without NTD data.

The Rural NTD meets additional statutory requirements. Section 3033 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy to Users (SAFETEA-LU) amended the NTD provisions under 49 U.S.C. 5335 to establish annual reporting requirements for grantees under FTA’s Section 5311 “rural” program. Congress also amended 49 U.S.C. 5311(b)(4) to require that each grant recipient receiving Rural Area Formula Program Grants must submit an annual report containing information on total annual revenue, sources of revenue, total annual operating costs, total annual capital costs, fleet size and type and related facilities, revenue vehicle mile, and ridership. These reporting requirements were combined by FTA with the NTD reporting requirements mentioned above, such that a single NTD report fulfills both statutory requirements.

Other statutory requirements. Finally, increasing transit ridership and reducing transit fatalities are two of FTA’s key performance measures under the Government Performance and Results Modernization Act of 2010. NTD also collects data on the accessibility of

transit vehicles to monitor compliance for the Americans with Disabilities Act of 1990. Both of these efforts rely on NTD data.

2. **How, by whom, and for what purpose the information is used and consequences if the information is not collected.**

How:

The NTD collects data through an online reporting system. Data is validated by analysts at the NTD operations center who work with the reporters to meet specific data quality standards. The respondents using the NTD consist of large urbanized transit systems, small transit systems and federally-recognized Indian Tribes as well as State and Territorial Departments of Transportation who enter data directly into the system on behalf of the transit systems in rural areas. Almost all of these reporters are recipients of 5307 or 5311 grant funds.

For What Purpose:

Each year, NTD data are used in statutory formulas to apportion over \$8 billion in FTA funds to public transit agencies. In addition to providing population-based support, the formulae have a significant performance-based component to encourage local investment in public transportation. FTA's only source of transit data for these apportionments is the National Transit Database. If the NTD data collection were discontinued, FTA would be forced to make the apportionments based on outdated data. Urbanized areas that have expanded their public transportation since the last data collection would not see their share of the apportionment increase accordingly.

NTD data are used by FTA, Congress, State and local governments, academic institutions, and individual transit agencies to understand the impacts of previous investments in public transportation and for performance benchmarking. For example, when retail gas prices surged in 2005 and in 2008, NTD data provided essential quantitative measurements of the impact on transit ridership. NTD data are also the only source of operating costs for various transit modes. All levels of government, from FTA to the state and local level use these data to make public transportation investment decisions, such as on the relative costs of an investment in light rail vs. a fixed-route bus system. These data would not be available from any other comprehensive nationwide source without the NTD.

The NTD also collects data on fatalities, injuries, and safety incidents related to public transportation from large urban transit systems. Without these data, there would be no national data source for assessing public transportation safety trends. Under MAP-21, Congress recently entrusted FTA with new authority to oversee the safety of the Nation's public transportation systems. Without NTD data, FTA would not have the necessary information to make informed decisions about the safety risks in the public transportation industry.

At the local level, NTD service and performance data are often used to make funding allocation decisions when multiple transit systems service the same area. State and local governments, as well as individual transit systems, use NTD information to make

performance benchmark comparisons among peer groups of transit systems. Without NTD data, there would be no nationwide source for this sort of benchmarking, which would make it harder for transit managers to drive efficiency improvements in their own systems.

FTA, U.S. Department of Energy and the Environmental Protection Agency also rely on NTD vehicle fleet and fuel consumption data to evaluate the energy needs and emissions impacts of public transportation. FTA, the Department of Labor, State and local governments, the American Public Transportation Association (APTA), individual transit agencies, and labor unions use NTD data on wages, hours, and employment. This information provides benchmarks for labor negotiations and comparability among peer systems. FTA and APTA use NTD data to review progress towards accessibility and compliance with the Americans with Disabilities Act (ADA) of 1990. The NTD records what percent of the transit vehicle fleet is ADA compliant and records the number of trips and their cost made on complimentary paratransit systems under the requirements of the ADA. These data would not be available without the NTD.

3. Describe whether collection of information involves information technology and any consideration of using information technology to reduce the burden.

Data for the NTD is currently collected entirely using information technology. The NTD uses an online reporting system in which respondents enter data on their office computers. These data are checked for errors through a series of automatic validation checks and then through a visual review by a validation analyst. Information technology allows the automatic validation checks to quickly identify routine data-entry errors, and allows the validation analyst to quickly raise more complex issues with reporters – and to quickly receive responses. From 1979 to 1994, NTD data were collected through paper forms, and from 1995 to 2001 NTD data were collected through diskettes that were mailed-in. The online reporting system, in place since 2002, has significantly reduced the overall reporting burden from the paper-based and diskette-based processes.

In October of 2014, the NTD began the roll out a new on-line reporting system (NTD 2.0.). This uses an off-the-shelf business process application that has been configured to collect transit data using NTD form pages much like the previous version. All NTD on-line functions will be migrated to the new system by July of 2015. The introduction of the improved NTD online reporting will reduce annual NTD maintenance costs, implement full DOT security requirements, and facilitate future expansion of data collection to meet MAP-21 statutory requirements.

As specified by provisions of MAP-21, FTA is in the process of implementing a national transit asset management program. Reporting additional transit asset inventory data to the NTD is one of the requirements of the legislation. FTA staff is currently working on the policy associated with this new requirement. It is unknown if the collection of this data will occur during the three-year period of the pending Paperwork Reduction Act approval. If so, FTA will submit a new request for approval of the expanded NTD data collection. FTA expects to publish a notice of proposed rulemaking for the national transit asset management program in the Federal Register in summer of 2015. Due to the complexity of

the rulemaking, a final rule is anticipated by September 2017.

4. Describe efforts to identify duplication.

The NTD is the only source of nationwide transit data and the only source of transit data collected according to a uniform system of accounts. Prior to the establishment of the NTD in 1979, the American Public Transit Association (APTA) collected and published financial and operating statistics based on reports from its members. This data set was limited since data was only collected from APTA members. Additionally, as a private membership organization, APTA had limited ability to validate these data, as collected from its own members, and there was no guarantee of public availability of these data. APTA has consistently supported the NTD as providing a valuable data resource for its members and for the general public.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

FTA continues to seek to reduce the overall burden of NTD reporting while maintaining the value of the NTD as a comprehensive nationwide data source.

In 2010, FTA released new guidelines for respondents to conduct statistical sampling for passenger mile data. This guidance was developed in partnership with Dr. Xuehao Chu at the University of South Florida's (USF) Center for Urban Transportation Research (CUTR). By using modern statistical procedures, this new guidance allows respondents to achieve the same data quality with significantly smaller sample sizes. This has produced a very significant reduction in reporting burden for transit systems of all sizes by requiring fewer data collection samples.

In the Conference Report accompanying SAFETEA-LU, Congress indicated that the data collection requirements for NTD should be "tailored to the smaller size of the typical public transportation system in rural areas, while still providing enough information to judge the condition and performance of our nation's network of rural public transportation systems" (H.R. Rep. No.109-203, at 943 (2005) (Conf. Rep.)). FTA took particular care in establishing the Rural NTD Module to do so. While a typical transit system reporting to the Urban Module of the NTD may fill out dozens of forms, FTA has consolidated the Rural NTD report into just a few short forms. Rural NTD data are primarily collected through the State Department of Transportation, which in many cases already has records of some of the required data, further minimizing the burden on small transit systems. Furthermore, FTA does not request or require rural transit providers or those that report on their behalf to report information more frequently than minimally required by statute. Nor does FTA request or require rural transit operators or those that report on their behalf to report more information to the NTD than minimally required by statute.

For small transit systems in urbanized areas reporting to the NTD, FTA introduced a new Small Systems Waiver in 2011. The Small Systems Waiver is open to any transit system that operates 30 or fewer vehicles in maximum service. This waiver exempts these small systems from making monthly ridership and safety reports, and instead collects this

information through a single annual report. Additionally, this waiver exempts small systems from having to report a breakdown of operating expenditures by function and object class, from reporting labor hours and fuel consumption, and from having to report passenger miles. Reporting passenger miles typically requires running a statistical sample, and small transit systems had indicated to us in the past that this was one of the most burdensome aspects of NTD reporting.

6. Describe consequences to federal program or policy activities if data were not collected or collected less frequently.

If data for the NTD were not collected, a number of federal programs would be affected, including the Urbanized Area Formula Program, the State of Good Repair Formula Program, the Rural Formula Program, the Tribal Transit Formula Program, the Safety program, the National Transit Asset Management System Program, and FTA's Civil Rights Program. Updated data would not be available for the formula apportionment, and approximately \$8 billion in funds would be allocated by FTA on the basis of outdated data. This would frustrate the Congressional intent of using the formula programs to provide additional money to those areas that invest in public transportation. FTA's safety program would be without timely data on safety events at the Nation's public transportation systems, including no longer having reports on events with one or more fatalities, one or more injuries requiring immediate medical transportation away from the scene, an evacuation for life-safety reasons or into a rail right-of-way, or of total property damage in excess of \$25,000. NTD data would also not be available to FTA for reporting to Congress on the conditions and performance of the nation's public transportation systems. FTA would not have current data for estimating the Nation's public transportation state of good repair backlog. Current NTD data also would no longer be available to FTA, State and local governments, researchers, and individual transit agencies for conducting peer group analyses and performance benchmarking activities to ensure that the nation's transit systems are run efficiently and effectively.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.6.

The NTD data collection is consistent with 5 CFR 1320.6.

8. Describe efforts to consult with persons outside the agency to obtain their views.

A 60-day Federal Register notice was published on December 29, 2014 (pages 78137-78138), soliciting comments prior to submission to the Office of Management and Budget (OMB). No comments were received. A 30-day Federal Register Notice was published in March 17, 2015 (pages 13949 – 13950). However, that notice contained an incorrect estimated total annual burden hour (26,000 hours) on respondents. The notice incorrectly reported only the annual burden associated to the rural respondents. On April 3, 2015 a Notice of Correction was published in the Federal Register Notice Vol. 80 No. 64 (page 18282). It corrected the total annual burden for all respondents as 302,400 hours.

FTA is in the process of implementing a “State of Good Repair” (SGR) Program, with a National Transit Asset Management System, as mandated by MAP-21. That will require reporting of additional data items to the NTD. We will accommodate this by expanding the current asset reporting module to include passenger stations, maintenance facilities, guideway systems, and track as well as SGR performance targets and progress reports. In the summer of 2015 we expect to issue a Notice of Proposed Rulemaking (NPRM) asking for comments on our plan for this. We will then conduct analysis in response to comments received and estimate the impact that our final configuration will have on the NTD reporting burden. A final rule is targeted to be published in 2016; a new information collection request will be submitted at the time of the NPRM publication. Provisions in the rule will become mandatory for the FY 2016 or FY 2017 NTD data collections.

FTA receives continuous feedback from NTD reporters as they interact with our analysts and program staff during the report validation process. We sponsor 10 free 2-day classroom training sessions on NTD reporting, as well as 10 webinars each year, through the National Transit Institute. NTD analysts attend each class. Comments from these sessions, for example, led to the development of the Small Systems Waiver that reduces the reporting burden for systems with 30 or fewer vehicles. Additionally, FTA participates in Transit Research Board professional activities, another avenue for feedback from the transit industry and research community. We conduct outreach sessions with the American Public Transportation Association, the Association for Commuter Transportation, the Community Transportation Association of America, and the American Association of State Highway and Transportation Officials. These trade associations, among others, have provided input on the National Transit Database.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift is made to respondents.

10. Describe any assurance of confidentiality provided by respondents.

No assurances of confidentiality are made to respondents.

11. Additional justification for any questions of a sensitive nature.

No sensitive information is requested or required.

12. Estimates of the hour burden of the collection of information and annualized cost to respondents.

The NTD reporters are comprised of Rural, Urban, and Small/Tribal Transit Systems. There are a total of 2,272 reporters required to submit this information into NTD.

Total Respondents: 2,272

Total Responses: 14,872

Total Annual Burden Hours: 302,400

NTD RURAL TRANSIT SYSTEM RESPONDENTS: The state agency, typically the State Department of Transportation administering FTA's Rural (Section 5311) Formula Program, report on behalf of their 1,300 rural transit sub-recipients. These reporters were not included in the 2012 information collection and MAP-21 mandated that these reporters provide forms that capture updated to capture financial information related to fare revenues, local funds, state funds, other funds, and federal sources unrelated to the §5311 program. These form changes were necessary for rural formula apportionments.

Reporting Requirements: For each sub-recipient, the State provides identifying information, sources of operating funds, sources of capital funds, vehicle revenue miles, vehicle revenue hours, a vehicle inventory, and unlinked passenger trips. They also report their fatalities, injuries, and safety incidents for the year. FTA estimates that it takes approximately 20 hours to report on behalf of each sub-recipient, including the time needed for the sub-recipient to gather the information and report it to its State DOT, the time for the State DOT to assemble the data and submit it to FTA, and the time to respond to validation questions from FTA about the data.

Estimated Total Annual Rural Burden: 26,000 hours

NTD SMALL TRANSIT SYSTEMS RESPONDENTS: FTA small transit systems consist of 300 transit systems with 30 or fewer vehicles and approximately 122 Tribal Transit reporters. For a total of 422 (300 + 122) small transit reporters.

Reporting Requirements: FTA provides reduced reporting requirements to small transit systems with 30 or fewer vehicles. These systems report only summary financial and operating statistics. They also report contact information, funding allocation information, a revenue vehicle inventory, the number of stations and maintenance facilities, and total injuries, fatalities, and safety incidents. They do not file monthly reports. FTA estimates that completing a report for a Small System requires approximately 27 hours, including time to assemble the information and respond to validation questions from FTA about the report.

Estimated Total Annual Small Systems Burden: 11,400 hours

NTD URBAN TRANSIT SYSTEMS RESPONDENTS: There are approximately 550 large urban transit systems required to file reports in NTD. They file an Annual Report, Monthly Report and a Safety and Security Report (per occurrence).

Urban Transit Systems - Full Report:

Reporting Requirements: The Full Urban report is comprehensive. Basic contact information, as well as information on sub-recipients and purchased transportation contracts must be provided. Sources of funds for operating expenses and capital expenses must be provided, as well as detailed operating and capital expenses for each mode by function and object class. Key service data collected includes vehicle revenue miles,

vehicle revenue hours, unlinked passenger trips, and passenger miles traveled; these must be provided by average weekday, average Saturday, average Sunday, and as an annual total. A comprehensive revenue vehicle inventory is collected, as well as information on fixed guideway mileage, passenger stations, maintenance facilities, fuel consumption, employee hours, and revenue vehicle breakdowns. Reports must be reviewed by an auditor and certified by the system CEO.

Although the level-of-effort required to complete a full report varies substantially with the size and complexity of the reporting organization, we calculate that it takes an average of 404.54 hours to complete a full report, including time to gather information and calculate passenger miles. The estimated burden for this module has increased over the 2012 burden estimate because we previously underestimated the number of reporters in this category (450) and have adjusted the estimate upwards to account for the correct number (550).

Estimated Total Annual Urban Full Reporting Burden: 220,000 hours

Urban Transit Systems – Monthly Report:

Reporting Requirements: Each month the 550 large urban transit systems must submit vehicle revenue miles, vehicle revenue hours, unlinked passenger trips, and vehicles operated in maximum service. Transit systems also provide a summary report of all minor fires and all incidents resulting in single-person injuries due to slips, falls, or electrical shocks. We estimate that it takes approximately 5 hours each month for each system to report these data. The estimated burden for this module has increased over the 2012 burden estimate as a result of FTA’s ability to more accurately capture the number of hours required to successfully submit NTD report.

Estimated Total Annual Urban Monthly Reporting Burden: 33,000 hours

Urban Transit Systems - Safety Event Reporting: On occurrence, the 550 large urban transit systems are required to file a major safety event report.

Reporting Requirements: Each system must provide a detailed report within 30 days of any incident involving one or more fatalities, one or more injuries, or total property damage in excess of \$25,000. FTA currently receives approximately 6,000 major incident reports per year, and estimates that it takes on average about 2 hours to collect data for each incident, enter it into the NTD, and respond to any validation questions. The estimated burden has increased over the 2012 burden estimate as a result of transit systems improving their compliance with safety reporting requirements.

Estimated Total Annual Major Safety Event Reporting Burden: 12,000 hours.

TABLE 1: Summary of Hours of Annual Burden Calculation

Types of Reports	2015 Report (Responses)	Burden Hours Per Report	Total Annual Burden
Rural Reporters	1300	20	26,000
Small Systems & Tribes	422	27	11,400
Urban Full Reporters	550	400	220,000
Urban Monthly Reporters	6,600 (550 x 12 months)	5	33,000
Urban Major Event Reports (per occurrence)	6000	2	12,000
TOTAL	14,872		302,400

Total Annual Burden: 302,400 hours

TABLE 2: Cost of Annual NTD Reporting by Transit Providers

Item	Labor Category (BLS code/title)	Labor Rate (\$/hr) (May 2013 BLS Statistic)	Preparation Time (hrs)	Cost (\$1000s)
Rural Reports	13-2011 Accountant	34.86	26,000	906.36
Annual Small System Reports	13-2011 Accountant	34.86	11,400	397.40
Annual Full Reports	13-2011 Accountant	34.86	220,000	7669.20
Monthly Reports	43-000 Office/Admin Support	16.78	33,000	553.74
Major Safety Event Reports	43-000 Office/Admin Support	16.78	12,000	201.36
Total Annual Burden			302,400	9,728.06

Total Annual Cost: \$ 9,728.06

13. **Estimate of total annual cost burden to respondents or recordkeepers resulting from the collection of information (not including the cost of any hour burden shown in items 12 and 14.**

There is no additional cost beyond that shown items 12.

14. Estimate of annualized cost to the federal government.

The NTD is supported by contractors in FY 2015 at a level of approximately \$4.5 million. The NTD is also supported by 3 FTE at \$133 thousand each for a total of \$399 thousand. The NTD has additional administrative costs of approximately \$100,000 each year for IT equipment and support.

Thus, the total cost to the federal government for FY15 for the NTD is \$5.0 million.

15. Explain reasons for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-1.

There are no changes in item 13.

The NTD was supported by contractors in FY 2012 at a level of approximately \$3.5 million. Since then, under new contracts, costs have increased by \$1 million annually. The NTD is now supported by 3 FTE rather than 4, which saves us \$133,000 annually. Administrative costs remain the same. The total cost to the federal government has increased by \$900 thousand (22 percent). As noted previously, there is also an increase in the number of rural reporters. Although MAP-21 mandated collection of rural data, it is virtually unchanged from previous years, under SAFTEA-LU. Thus, the mandate of rural providers reporting to NTD has been in existence since SAFETEA-LU, so therefore is not a new requirement under MAP-21. In the 2012 Paperwork Reduction Act, still under SAFTEA-LU, FTA only counted a small number of rural reporters (states and state-like entities.) In 2015, FTA went further, counting the 1300 sub-recipients that these states actually report for. This was done to account for new functionality in the NTD on-line reporting system that gives sub-recipients the option of reporting directly into the on-line system. In the past this data entry was done manually by the states. In addition, a new section 5311(c)(3)(C)(iii) in MAP-21 makes vehicle revenue miles an apportionment factor (in the formula). It was this change that required FTA to collect more detailed information in order to correctly attribute those miles.

16. Plans for tabulation and publication for collections of information whose results will be published.

Data from the NTD are made available electronically at www.ntd.fta.dot.gov. Data are published in various Excel-format data tables and database files. Data from each transit system reporting to the NTD is also compiled into a summary one-page data profile. Other data compilations and analyses of a more ad-hoc nature are also posted on the website.

17. If seeking approval not to display the expiration date for OMB approval, explain the reasons.

There is no reason not to display the expiration date of OMB approval.

18. Explain any exception to the certification statement identified in Item 19 of OMB Form 83-I.

There are no exceptions to certification statement.