DEPARTMENT OF TRANSPORTATION

FEDERAL TRANSIT ADMINISTRATION

JUSTIFICATION STATEMENT

National Transit Database

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. The NTD is designed to support local, state and regional planning efforts and help governments and other decision-makers make multi-year comparisons and perform trend analyses. It contains a wealth of information such as agency funding sources, inventories of vehicles and maintenance facilities, safety event reports, measures of transit service provided and consumed, and data on transit employees. 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.

In July 2012, the Moving Ahead for Progress in the 21st Century Act (MAP-21) amended Federal transit law by adding a new section 5326 for transit asset management. The provisions of section 5326 require the Secretary to establish a National Transit Asset Management (TAM) System which would require that all recipients and sub-recipients under Chapter 53 develop a Transit Asset Management Plan and establish annual reporting requirements. The Secretary is also required to establish state of good repair performance standards and recipients must set performance targets based on those standards. 49 U.S.C. 5326(c) (1) and (2). Designated recipients must report annually on the condition of their recipients' public transportation systems and the recipients' progress towards meeting performance targets.49 U.S.C. 5326(c)(3). In addition to section 5326, MAP-21 also updated section 5335 with subpart c requiring the recipient of a grant under this chapter to report 'any information relating to a transit asset inventory or condition assessment conducted by the recipient" to the NTD. NTD was reauthorized under the Fixing America's Surface Transportation Act (FAST).

This supporting statement is associated with a request for the expansion of reporting requirements for asset inventory in the National Transit Database (NTD). As required in MAP-21, recipients of FTA funding must report any information relating to a transit asset inventory or condition assessment to the NTD. While the NTD now collects asset inventory information on revenue vehicles and summary counts for other assets, such as maintenance facilities and fixed guideway systems, this information collection requests the addition of all asset inventory data into the currently approved NTD information collection program. The change in this collection reflects an increase in total burden hours from 302,400 in the previous approved information collection to an annual total burden hours of 323,435.

A. Justification

1. Circumstances that make the collection of information necessary.

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 these requirements. 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.

MAP-21 requires grant recipients to report asset inventory and condition information to the NTD: MAP-21 added a new subpart c to 49 U.S.C. 5335 that requires recipients of a grant under this chapter to report 'any information relating to a transit asset inventory or condition assessment conducted by the recipient'. Additionally, 49 U.S.C. 5326(c)(1) and (2) requires recipients to report annually on the condition of their transit assets as well as their progress against set performance targets. The proposed asset inventory would meet these statutory requirements.

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. The capital asset data collected through the NTD 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. The proposed asset inventory information would improve the quality of the industry state of good repair analysis completed as part of this report.

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.

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:

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. 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. These data would not be available from any other comprehensive nationwide source without the NTD.

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.

New Reporting Requirements – Asset Management:

By including a directive for a National Transit Asset Management (TAM) system in MAP-21, Congress drew attention to the need for more robust asset management practices in order to address aging transit infrastructure nationwide. The NTD will be the mechanism used to collect this new asset inventory for the TAM program. The expanded asset inventory is one important part of standardizing and strengthening these practices throughout the transit industry. The reporting requirements will be optional in report year 2017 with full implementation required in report year 2018. The new asset inventory data to be collected in the NTD includes the following:

1. Administrative and Maintenance Facilities. Reported for all facilities for which an agency has a capital responsibility. Collects information on administrative and maintenance facilities used to supply transit service, including facility name, street address, square footage, year built or substantially reconstructed, and primary transit mode supported. Also includes a condition assessment at least once every three years for facilities for which an agency has capital replacement responsibility.
2. Passenger and Parking Facilities. Reported for all passenger and parking facilities used in transit service. Collects information on passenger facilities and passenger parking facilities used in the provision of transit service, including facility name, street address, square footage and number of parking spaces, year built or substantially reconstructed, primary mode and percent of capital responsibility. Also includes a condition assessment at least once every three years for facilities for which an agency has capital replacement responsibility.
3. Fixed Guideway. Reported for all fixed guideway used in transit service. Collects data on linear guideway assets and power and signal equipment, including the length of specific types of guideway and corresponding equipment, reported as network totals by mode and operating agreement. The data includes quantity, expected service years, date of construction or major rehabilitation (within a ten year window) and percent of capital responsibility.
4. Track. Reported for all track used in transit service. Collects data on track assets, including length and total number of track special work, reported as network totals by rail mode and operating agreement. The data includes expected service years, date of construction or major rehabilitation and percent of capital responsibility.
5. Revenue Vehicles. Reporting requirements remain the same for urban/full and rural/reduced reporters with the addition of a useful life benchmark for each vehicle fleet. Section 5310 recipients now report according to the rural/reduced requirements.
6. Service Vehicles. Reported for all non-revenue service vehicles for which an agency has capital replacement responsibility. Collects data on service vehicles that support transit service delivery, maintain revenue vehicles, and perform administrative activities. The data includes quantity, expected service life, and year of manufacture. Also includes a useful life benchmark for each vehicle type.
7. Transit Asset Management Performance Metrics. The metrics included in the Transit Asset Management rule are reported annually to the NTD:

    Equipment-Service Vehicles. The performance measure for non-revenue, support and maintenance vehicles is the percentage of vehicles that have met or exceeded their useful life benchmark (ULB). To determine the ULB, a Transit Provider may either use the default ULB established by FTA or a ULB established by the Transit Provider in consideration of local conditions and usage and approved by FTA. The NTD system will calculate annual performance based on the manufacturer's age information that is

entered into the vehicle inventory. Reporters are required to provide one target for the percentage of classification of non-revenue vehicle that have met or exceeded their useful life benchmark for each service vehicle category.

Rolling Stock. The performance measure for rolling stock is the percentage of revenue vehicles within a particular asset class that have either met or exceeded their useful life benchmark (ULB). To determine the ULB, a recipient may either use the default ULB established by FTA or a ULB established by the recipient in consideration of local conditions and usage and approved by FTA. Recipients will report one target and useful life benchmark for each revenue vehicle classification. The NTD system will calculate annual performance based on the date of manufacture information entered into the vehicle inventory.

Rail fixed Guideway Infrastructure (track, signals, and systems). The performance measure for rail fixed guideway infrastructure is the percentage of track segments, signals, and systems with performance restrictions. Recipients will report a target and performance of this metric for each rail mode. FTA will provide additional technical assistance and guidance on how to measure a performance restriction.

Facilities. The performance measure for facilities is the percentage of all facilities rated below condition 3 on the condition scale used by FTA's Transit Economic Requirements Model (TERM). Reporters must provide a condition rating for each facility at least once every three years. The system will automatically calculate performance based on these reports. Reporters are also required to provide an annual target for each facility type. FTA will provide additional technical assistance and guidance on to measure a facility condition rating on the TERM scale.

In addition to creating a national standard, the asset inventory will allow for a more robust analysis of the nation's state of good repair backlog. An estimate of the transit industry's state of good repair backlog is currently reported biannually to the congress in the Conditions and Performance Report. The current backlog estimates are being derived through annual asset surveys provided by transit agencies. A systematic collection of this information through the NTD will allow for a much more precise estimate of the national condition of transit assets as well as their funding needs.

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 indentify 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 were migrated to the new system in January 2016. The introduction of the improved NTD online reporting will implement full DOT security requirements, and facilitate future expansion of data collection to meet MAP-21 and FAST Act statutory requirements.

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 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 has taken 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. Additionally, 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.

The asset inventory module maintains an awareness of the need to keep the burden low for both rural and small systems. The overall asset reporting requirements for rural and small systems was kept lower than that of the larger agencies. For example, the vehicle inventory reporting form for these systems has approximately 40% less reporting fields than those required of larger agencies.

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 preliminary version of the proposed asset inventory module was published in the Federal Register on August 19, 2014. FTA received 18 comments in response. Several respondents requested that the implementation of the asset inventory be postponed to coincide with the publication of the National Transit Asset Management System rule. FTA agreed with this request. The current asset inventory was created in response to the comments received and a second Federal Register was published for comments on November 18, 2015 in conjunction with the publication of the Notice of Proposed Rulemaking for the National Transit Asset Management (TAM) System rule. FTA received 25 responses to that notice. A number of comments expressed concern over the additional burden imposed by expanding the asset inventory and few felt the burden calculations were understated.

The National Transit Asset Management (TAM) Final Rule is being published concurrently with this information collection request and requires all agencies to (1) create and maintain an asset inventory along with condition assessments and (2) performance targets. A burden estimate was calculated as part of that rulemaking process for those tasks and filed under a Paper Work Reduction Act notice. The NTD burden estimate provided assumes that an agency will already have an asset inventory in place as part of their compliance with the TAM rule and, therefore, only includes the time and costs estimated to enter existing asset inventory information into the NTD reporting system. In some cases, modifications to existing data may be necessary to enter this information into the NTD. The burden estimates provided in this notice take into account small modifications of existing information in the asset inventories required by the TAM Rule for reporting in the standard formats established by the NTD.

In calculating the burden estimate for NTD reporting, FTA asked several agencies to enter their existing asset inventory information into the proposed format and report the time necessary to complete this task. Three (3) agencies completed an entire report and their experience with the new reporting requirements served as the foundation for the final estimates. A 'per field' reporting time was calculated and then multiplied out over the estimated data fields expected nationally to create a final burden estimate. Because the numbers presented are averages, some agencies may expect to spend more time and some agencies will spend considerably less than the estimated average.

FTA remains committed to implementing reasonable data reporting requirements, while also meeting the requirements in the law for reporting asset condition information. In response to the first round of comments on the asset inventory, FTA made several modifications to reduce the overall reporting burden including removing replacement cost information for all asset types. FTA believes that this asset inventory fulfills the MAP-21 update to 49 U.S.C. 4335(c) that recipients report asset inventory and condition assessment information to the NTD and allows meaningful data analysis on the national capital needs of the transit industry. While FTA recognizes that the proposed changes would result in an increase over the current reporting requirements, the highest burden would exist in the first year of start-up reporting. Once an asset has been entered into the inventory module, the information would be pre-populated for each subsequent year. Reporters only would be responsible for providing annual updates to new or retired asset inventory items in subsequent years.

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. The new asset inventory module would be required of all current reporters. A current template of the module that will be included in the NTD for grantees to input their asset inventory is included in the submission of this PRA. The documents can be found under the supplementary documents section of ROCIS.

Total Annual Respondents: 2,272
Total Annual Burden Hours: 323,435 (302,400 burden hours previously approved + 21,035 burden hours as a result of the new transit asset inventory requirement)

A preliminary version of asset inventory module was provided to a pilot group of seven rail transit agencies of various sizes and ages. These agencies were requested to complete the module and report on the time required to both compile their asset data into a central location and to input the information into the module. Four of the seven pilot agencies did not fully complete the module or did not give sufficient feedback for burden estimating purposes. The three agencies that provided complete information formed the basis for estimating the national reporting burden. These agencies and their reported burden estimates were used to estimate a reporting burden of .16 hours per revenue vehicle. Note that this methodology assumes that the number of revenue vehicles correlates to the amount of additional assets that would be reportable. Please see a table summarizing the actual information

Pilot data (11.6.12)	Total burden reported by provider	# of revenue vehicles	Calculated burden	Difference	Reported burden per vehicle (hours)
Agency #1	76	1146	183.36	107.36	.07
Agency #2	102	543	86.88	-15.12	.19
Agency #3	16	73	11.68	-4.32	.22
Average					**0.16**

The FTA expects that there will be a larger burden in the initial year of reporting (31,733 hrs.) as transit systems enter their detailed inventory information for the first time. The NTD system will repopulate this data in subsequent years and reporters will only be required to make adjustments to their data set. This will considerably reduce the burden of this module in out years to 15,867 hrs. The tables below detail the anticipated reporting burden in hours and dollars for both the initial year of reporting as well as the out years.

TABLE 1: Summary of Hours of Annual Burden Calculation – Asset Inventory Only

Reporter Type	Assumptions	Initial Hours of	Average Annual

		Burden (Year One)	Recurring Hours of Burden
Urban Reporters	**0.16 hours per revenue vehicle for 116,472 vehicles for initial year and 0.08 hours per vehicle for annual updates.**	**18,636**	**9,318**
Rural and Small Systems	**0.16 hours per revenue vehicle for 81,858 vehicles for initial year and 0.08 hours per vehicle for annual updates.**	**13,097**	**6,549**
Total		**31,733**	**15,867**
Total Annual Burden Hours (Average of Year One and Re-Occurring)Years		**21,035**	

TABLE 2: Cost of Annual NTD Reporting by Transit Providers – Year One

Item	**Labor Category (BLS code/title)**	**Labor Rate ($/hr)** (May 2013 BLS Statistic)	**Preparation Time** (hrs)	**Cost** ($1000s)
Urban Reporters	Business Operations Specialist	48.72	18,636	907,923
Rural and Small Systems	Business Operations Specialist	40.25	13,097	527,166
Total First and Second Year Cost			**31,733**	**1,435,089**

TABLE 3: Cost of Annual NTD Reporting by Transit Providers – Ongoing

Item	**Labor Category (BLS code/title)**	**Labor Rate ($/hr.)** (May 2013 BLS Statistic)	**Preparation Time** (hrs.)	**Cost** ($1000s)
Urban Reporters	Business Operations Specialist	48.72	9,318	453,961
Rural and Small Systems	Business Operations Specialist	40.25	6,549	263,583
Total Yearly Cost - Ongoing			**15,867**	**717,544**

Total Annual Cost (First Year): $ **1,435,089**
Total Annual Cost (On-going): **$717,544**

Average Cost First 3 Years: **$956,726**

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 in item 12.

14. Estimate of annualized cost to the federal government.

There will be a one-time cost of reprogramming the NTD system to accommodate these new reporting forms. This is estimated to be a one-time upfront cost of $800,000. After this time, the cost to maintain and use these forms will be absorbed in the current operating costs described below.

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 total cost to maintain the NTD described in item 14 is not expected to change beyond a one-time up front cost to reprogram the NTD software with the new reporting forms.

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.