## Bus Testing Program 2132-0550 Comment and Response from 60-Day FRN

On July 2<sup>nd</sup>, 2019, FTA published a 60-day Federal Notice to review this information collection (Vol. 84, No. 127) pages 31657. One comment was received on that notice from the Michigan Department of Transportation (MDOT) Docket #FTA-0008-0001. The comment states:

"MDOT supports the continued collection of bus testing information by the Thomas D. Larson Pennsylvania Transportation Institute (LTI) with the following concerns; 1.) Timeliness of testing on new or updated bus bodies and OEM vehicle chassis, test completion can take up to a year or more in some instances; 2.) Communication of testing delays to recipients. Explanation of delays doesn't seem to be provided to bus manufacturers or chassis OEMs; 3.) Increased testing capacity. With the increase in Federal emissions and fuel economy standards, OEMs are continually introducing new engine and transmission combinations that require new tests. Adding staff or opening additional test facilities may help alleviate this issue. The LoNo test facilities at Ohio State University and Auburn University may be an option to help assist in the testing of traditional buses if allowed, which would shorten test delays."

## FTA's Response:

FTA acknowledges that improvements can be made in the application response process. In an effort to address these issues, this information collection request includes a new web-based test form for bus testing determinations and approvals with the purpose of not only improving request turn arounds, but increasing transparency where submitters will be provided real-time updates with the status of their applications.

The purpose of the PRA is to provide an estimate of time burdens associated with the preparation of a determination and/or and approval request. The time burdens consider all the technical and legal advisors involved in the process of gathering information to prepare and submit an application. Unfortunately, addressing the duration of tests, how many tests are performed, and any modification to 49 CFR 665 is outside of the scope of this document. We appreciate MDOT's comments and encourage you to submit any suggestions and/or recommended amendments following applicable protocols established in 49 CFR 601, "Organization, Functions, and Procedures"