



U.S. Department
Of Transportation
**Federal Transit
Administration**

Headquarters

East Building, 5th Floor – TCR
1200 New Jersey Avenue SE
Washington, DC 20590

NOV 07 2012

Michael A. Kaigler, Director
Human Resources and Services
Chatham County Government
Old Chatham County Courthouse
124 Bull Street
Suite 310
Savannah, GA 31401

Dear Mr. Kaigler:

This letter concerns the Federal Transit Administration's (FTA) Americans with Disabilities Act (ADA) Complementary Paratransit Service Review of Chatham Area Transit (CAT) conducted from December 7-9, 2009. FTA would like to thank CAT staff and contractors for the cooperation provided to the review team during the on-site review. Enclosed is a copy of the Final Report which will be posted on FTA's website on our ADA page. CAT's response to the Draft Report, which we received on September 21, 2012, is included as Attachment A.

The Federal Transit Administration (FTA) Office of Civil Rights is responsible for Civil Rights compliance and monitoring which includes ensuring that providers of public transportation are in compliance with the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, and the Department of Transportation's (DOT) implementing regulations at 49 CFR 27, 37, 38 and 39.

With the transmission of the enclosed Final Report, the follow-up reporting period has now begun. At this time, we ask CAT to provide a written response within 30 days of the date of this letter listing its proposed corrective actions (and implementation dates). FTA will use these timelines and milestones to monitor CAT's progress as CAT works to resolve the deficiencies.

In addition to the findings described in the report, several additional issues have been identified through staff review of CAT public information or otherwise brought to our attention. Because these items were discovered after the on-site visit, they are not addressed in the Final Report and will be addressed outside of the compliance review process; however, many of these additional issues are relevant to the findings contained in this report. Whether CAT elects to address these additional issues in its corrective action in concert with the report findings or in a separate document is a matter for CAT to determine.

Upon review of CAT public information and/or as discussed in telephone conversations with CAT staff, the following items were noticed; the Teleride Manager and CAT's Director of Human Resources agreed to provide additional information to the FTA when CAT entered follow-up reporting:

- Change from Door-to-Door to Curb-to-Curb
- Eligibility Determination Process

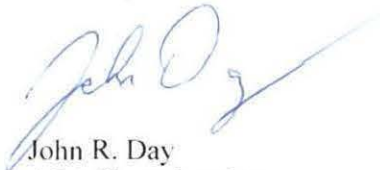
- No More "Call Back" Procedure
- No-show/Late Cancel updated policy

In addition, we have also been made aware of reports that CAT may be planning to replace accessible paratransit vehicles that have exceeded their useful life with inaccessible vehicles. Please confirm CAT's vehicle replacement plans; as discussed in Chapter 10 of this report, we have concerns about the age and condition of the Teleride fleet at the time of the review, as well as a lack of capital expenditures for the preceding three years and CAT's ability to cover peak Teleride runs. As the fixed-route provider, CAT has an obligation to plan, budget and operate its ADA paratransit system according to expected demand. This includes vehicle and fleet maintenance, which if not performed may result in prohibited capacity constraints. As explained in Appendix D to the DOT ADA regulations, "...if the entity regularly does not maintain its vehicles well, such that frequent mechanical breakdowns result in missed trips or late arrivals, a pattern or practice may exist."

We ask that CAT also respond to these concerns and include a copy of its current fleet roster and fleet replacement plan discussed in Recommendation 10.10.1 on Page 86 of the enclosed report.

Please provide CAT's corrective action plan and responses electronically within 30 days of the date of this letter to Susan Clark, Equal Opportunity Specialist, via email at sue.clark@dot.gov, with a copy to Carlos Gonzalez, FTA Region 4 Civil Rights Officer, at carlos.gonzalez3@dot.gov. Thank you.

Sincerely,



John R. Day
ADA Team Leader
FTA Office of Civil Rights

Enclosures

cc: Dr. Chadwick Reese, CAT
Ramond Robinson, CAT
Yvette Taylor -Regional Administrator, FTA Region 4
Carlos Gonzalez, Regional Civil Rights Officer, FTA Region 4
Christopher White, Program Manager, FTA Region 4
Parris Orr, Community Planner, FTA Region 4
Erica Matos, Attorney-Advisor, FTA Region 4
Monica McCallum, Regional Operations Division Chief, Office of Civil Rights