

**FTA TRANSIT ASSET MANAGEMENT (TAM)  
NOTICE OF PROPOSED RULEMAKING (NPRM)  
OCTOBER 7, 2015  
HILTON UNION SQUARE  
SAN FRANCISCO, CALIFORNIA**

Bob Tuccillo, Associate Administrator for Budget and Policy, FTA, welcomed participants to the listening session and gave a brief overview of the Notice of Proposed Rulemaking (NPRM) process. He said FTA reviewed over 2,500 pages of comments submitted in response to the Advanced Notice of Proposed Rulemaking (ANPRM) on both the safety program and the new requirements for Transit Asset Management (TAM) under MAP-21.

John Giorgis, FTA, then described the purpose of the meeting. The session, he said, was not designed to be a public hearing, but rather a forum for FTA to go over the NPRM section-by-section and answer questions for clarification.

He announced that the session would be recorded and submitted as part of the official docket on the rulemaking.

Transit providers receiving funds from FTA, he said, are required to have a TAM Plan—a business model that uses the condition of assets to “guide the optimal prioritization of funding at transit properties to keep transit networks in a State of Good Repair (SGR),” he said.

An FTA report released in 2013 (based on 2010 data) revealed that an estimated \$85.9 billion would be needed to bring the nation’s transit system into SGR. The government is facing fiscal constraints—and so are state and local governments.

“TAM is designed to be a business ‘Best Practice’ that will help us prioritize the best we can with resources available in a fiscally constrained environment,” Giorgis said.

The proposed rule fits into a broader performance management framework envisioned by MAP-21 across all modes of surface transportation. FTA is

proposing two major rules addressing performance-based efforts: The National and Agency Safety Plan will propose safety performance measures and TAM will propose SGR measures.

The NPRM opened for comment September 30, 2015, and the final rule is expected by next summer.

The proposed rule includes five main sections: General Provisions, TAM System, TAM Plans, Performance Management and Recordkeeping and Reporting Requirements.

## **A. General Provisions**

The main purpose of developing an asset management system is to help transit systems achieve and maintain a SGR for the nation's public transportation system, Giorgis said.

## **B. National Transit Asset Management System**

The five pillars of asset management envisioned by MAP-21 requires FTA to do the following:

- Define SGR
- Require that TAM plans be developed by all recipients and subrecipients, including asset inventory and investment prioritization
- Establish SGR performance measures against which all grant recipients will set targets
- Report data to the NTD
- Receive Technical Assistance.

SGR is defined as the condition in which a capital asset is able to operate at a full level of performance. This means that an asset must be able to perform its designed function, must not pose a known unacceptable safety risk and must have met or recovered its lifecycle investment.

## **QUESTIONS**

**Robert Guptill, MBTA**, asked whether an asset that is not in a SGR poses a safety risk.

Giorgis said that to be in a SGR an asset must meet all three criteria. An asset that doesn't pose a known unacceptable safety risk but whose lifecycle maintenance has been deferred would not be in a SGR. "But we are not necessarily implying anything about the safety risk associated with the asset," he said.

**Robert Guptill, MBTA**, asked whether an asset that is performing its designed function and that does not pose a known unacceptable safety risk could be in a SGR even if it does meet the maintenance element.

Giorgis said that for an asset to be defined as being in a SGR "it must check all three boxes, must meet all three of what we call 'objective standards.'" An asset that has deferred maintenance associated with it, has not met the third element so it would not be in a SGR—even if it is performing its designated function and is not posing a known unacceptable safety risk.

**Mike Hubbell, DART**, said his agency's maintenance plan is dynamic. DART conducts a condition assessments and modifies its maintenance plans as a result of the assessments. What happens if DART's plan says the agency will do X, but its condition assessment suggests the agency should be doing Y?

Giorgis said that FTA is not in a position to determine maintenance plans for individual transit agencies. FTA recognizes that maintenance plans will be dynamic and what is scheduled maintenance for an asset may change over time as plans are updated. "The third standard is about whether you are meeting your own maintenance plan that you set up for that asset," he said. "Are you doing what you said you were going to do?" Giorgis said there was a point at which a maintenance plan is adjusted because of increased experience and a point at which maintenance on the asset is deferred. "When you are at the point of deferring maintenance," he said, "that's what the third standard describes."

**Mike Hubbell, DART**, explained a scenario involving traditional buses with 12-year and half a million-mile lifecycles. Are 14 year old 900,000 miles life to date buses automatically considered to be outside SGR based solely on their life expectancy?

Giorgis explained that there will be a difference between what is the minimum replacement life under federal procurement standards for federally funded assets and what is the target useful life that is established for an asset as the point where it

reaches SGR and should have been replaced. “There is a minimum point where you can’t replace the asset before the minimum point to ensure federal interest in the asset,” Giorgis said, “but there is also a maximum where it enters the SGR and those will be different ages.”

## **C. Transit Asset Management Plans**

Giorgis said that all providers who are recipients or subrecipients of Federal financial assistance under 49 U.S.C. Chapter 53 must submit TAM plans. FTA tailored its TAM plan requirements to providers based on whether they fall under Tier I or Tier II.

Tier I agencies would be transit systems that operate rail or have over 100 vehicles in peak revenue service.

Tier II providers do not operate rail, have 100 or less vehicles in peak revenue services or exclusively receive Federal funds from 5310 or 5311 programs.

Tuccillo said FTA estimates that most of the 3,000 transit providers in the nation will be classified under Tier II.

### **QUESTIONS**

**Leslie Rogers, FTA, Region 9**, said some State DOTs don’t operate vehicles but may get State Safety and Oversight Agency (SSOA) funding. “How do we treat them?” he asked.

Giorgis said a grant program for SSOAs was created under MAP-21. By law, recipients of these funds are not permitted to operate transit service so the grant program “will not carry with it the requirement to do an asset management plan.”

**Pete Stark, Whatcom Transportation Authority**, asked whether “all modes” include van pools or just motor buses and demand response vehicles.

George said that “all modes” includes van pools.

**Nicholas Richter, MTC**, asked what class ferry operators fall under. Wash DOT in Seattle, he said, runs a few dozen boats. Would they fall into Tier II because they are not operating rail?

Giorgis said most ferry operators will fall into Tier II. “They are fixed guideways,” he said, “but not rail fixed guideways and most ferry operators have less than 100 vehicles.”

## **Proposed TAM Plan Elements**

### **Inventory of Capital Assets**

All plans must include a listing of all capital assets that transit providers own, operate or manage. Providers may use existing inventories already collected and include assets acquired without FTA funds.

### **Inventory by Categories and Class**

FTA proposed four main overarching asset categories: Rolling Stock, Facilities, Infrastructure and Equipment. The purpose of the Asset Inventory, he said, is to start “informing your management and stakeholders what assets you have, what condition they are in and to inform investment prioritization.”

### **Condition Assessment**

Condition assessment is a rating of the inventoried assets. What condition are assets in? Good? Fair? “Rating should be done at the level of detail that is sufficient for you to monitor and predict the performance of assets in your inventory,” Giorgis said. They could be collected at the individual level or together for all assets in a given asset class.

### **Decision Support Tools**

Decision support tools could be a process or actual tool that supports transit providers in developing the investment prioritization. The tool does not have to be a software program. “Identify what process or tools work for you,” Giorgis said.

### **Investment Prioritization**

TAM plans must include a list of investments providers are planning to make for their system. The TAM plan must include a ranked listing of proposed projects and programs by the year the transit agency plans to implement them. While

prioritizing investments, providers should consider any identified unacceptable safety risks and accessibility requirements “that may kick in as a result of the decision to replace or rehab an asset,” he said.

### **TAM and SGR Policy**

An SGR policy describes the goals and policies of a transit provider’s TAM plan while strategies consists of actions that support implementation of a TAM policy.

### **Implementation Strategy**

Implementation strategies focus on actions the transit provider will take over the course of the year to achieve their TAM policies.

### **List of Key Annual Activities**

Providers will describe actions need to implement TAM plans for each year such as software development, coordination between maintenance and finance offices.

### **Identification of Resources**

Providers need to identify resources they will need to achieve the objective of the plan. How much money, for instance, will it take to achieve SGR? How much staff time will be involved to achieve TAM goals?

### **Evaluation Plan**

Transit providers must also describe how TAM activities will be monitored, evaluated and updated to ensure the continuous improvement of TAM practices.

### **Plan Responsibility**

Each transit provider must designate an Accountable Executive who will have the authority of approving and implementing TAM plans. Tier I providers must develop their own TAM plan, while Tier II providers may participate in a Group Plan or opt out and develop their own TAM Plan.

## **QUESTIONS**

**Mike Hubbel, DART**, said he did not see the term “asset” defined in Section 625.5, but he noticed that Giorgis used a very “granular definition of what an asset is.”

Giorgis encouraged Hubbel to submit the question to the docket. He said FTA tried to avoid establishing a one size fits all requirement for a “level of granularity” that every transit provider should have for their system. FTA provided a general outline that an asset should be a “piece of tangible equipment” with a useful life of more than one year. “But the level of granularity you put into your asset inventory should be based on what makes sense for the way in which you do capital planning,” he said.

**Mike Hubbel, DART**, said that FTA’s definition would include floor jacks and other “things that to us are just considered shop equipment”—equipment that DART may not necessarily include in its asset management plan.

Giorgis said that the asset inventory must include all assets “at a level that is sufficient to inform investment prioritization.” If an asset is sufficiently small that it wouldn’t rise to the level of being a capital project that would fit into investment prioritization, then it is not required to be in the asset inventory.

**Diana Kotler, Anaheim Transportation Network**, said she didn’t see any assets listed in the ITS category for the Tier II providers.

Giorgis said that those assets are not specifically excluded. They would fall under the element of equipment, unless they are sufficiently integrated with the vehicle itself and replaced as part of a vehicle replacement project.

**Diana Kotler, Anaheim Transportation Network**, explained that small transit providers sometimes share station facilities or rely on stations that belong to the cities or counties. “How do you plan (for) us to account for that?” she asked.

Giorgis said that the asset inventory should include any asset the provider relies upon to provide transportation services. An asset that the provider does not have capital responsibility for would therefore not be considered in the investment prioritization. But the provider still has to identify it as an asset necessary to roll out transportation services.

**Mike Hubbel, DART**, said his transit agency works with a contracted operator, who provides paratransit services. They own 200 or so vehicles and manage the whole fleet. The transit provider pays these contractors on a per trip basis to provide a level of service. “We neither lease them (vehicles)” he said, “nor do we contract with them to provide X number of vehicles.” The contractor’s fleet size is

“dynamic” based on the transit agency’s needs. Should his agency include those assets within the TAM plan?

Giorgis said that transit operators have to include any assets they rely upon for service in the asset inventory, including those provided by contractors. Hubbel should submit a question to the docket seeking advice on how DART should go about managing SGR of assets provided by contractors the agency relies upon for service.

**Mike Hubbel, DART**, followed up by asking whether FTA had thought having contractors submit a “Second Tier TAM” as part of their contract that would then be attached as an addendum to the transit agency’s plan.

The NPRM, Giorgis said, states that grant recipients are responsible for all services they provide directly or indirectly through a contractor. FTA just updated its definition of what constitutes a contracted service. Transit providers would be responsible for collecting information from paratransit providers who meet the “contractor” standards. “We would look to you and we would not have direct relations with contractors under the proposed rule,” he said.

**Robert Guptill, MBTA**, asked if the “Accountable Executive” would be responsible for carrying out both the Safety Management System and the TAM system.

Giorgis said yes, but added that the safety requirements have not been formally proposed yet. “But the concept that will be proposed in the draft safety rule we are developing is identical to concept we have proposed in this rule,” he said.

**Robert Guptill, MBTA**, said that one person in the safety department is responsible for safety and another person is responsible for asset management. Guptill asked: “We wouldn’t have two different people based on what you are suggesting?”

Giorgis said the safety rule hasn’t been released yet, and this NPRM does not address “whether it could be the same person or different people.” He suggested Guptill submit this question to the docket by stating that he is looking ahead to see whether the concept proposed in the NPRM includes safety responsibilities. “Ask how that would interact once the safety rule is released,” he said.



**Nicholas Richter, MTC**, posed a question related to TERM Light, which has an expansive asset type classification. He asked whether there would be a cross-reference table between existing asset types and the new characterization hierarchy proposed in the NPRM.

Giorgis said the only formal hierarchy proposed in the NPRM are four categories—and these categories are fairly compatible with those in TERM Light. The classes mentioned are just examples. There is no requirement that transit agencies must use those classes, he said.

**Nicholas Richter, MTC**, asked what would happen if an agency that owns assets and another agency that operates them each include the same assets in their inventory. Has FTA considered the possibility of double counting? How will FTA “roll this up to the national level?”

Giorgis said there is no provision that says FTA is going to collect and review the 3,000 or so TAM plans from agencies across the country. But every transit system should have an accounting of assets necessary to provide service. As part of that inventory, agencies should look at their capital responsibility for each asset. “That will inform the investment prioritization” and determine the agency’s reinvestment needs. A Federal Register Notice expected to be issued in a few weeks would describe how FTA proposes collecting data for the NTD.

## **Group Plans**

FTA proposed a Group TAM Plan option to reduce the burden of compliance on smaller providers. Group Plans must be compiled by a sponsor—generally the state DOT, or designated 5307 or 5310 recipient. Tier II providers can participate in a single Group Plan or may choose to opt out and develop their own TAM Plans. A Tier I provider can only participate in a Group Plan as a sponsor.

## **QUESTIONS**

**Dick Jarrold, KCATA**, said that his agency is a designated recipient of Section 5307 and 5310 and works with subrecipients. Is the cost of developing a Group Plan an eligible expense under Section 5310 administrative cost provisions? “Is there a way for us as sponsors to put that plan together and the financing for it?”

Giorgis said that as a designated recipient of 5310 funding, his transit agency is required to offer a Group Plan to 5310 subrecipients. He suggested Jarrold contact FTA's regional office to find out whether administrative costs could be used to finance the development of a Group Plan.

**Melonie Choy, MTC**, said that each individual entity or subrecipient may have many funding sources. Should each entity draft its own investment prioritization? Does FTA expect that a Group Plan would just be a "stapling of that and compilation of it?"

Giorgis said that a Group Plan sponsor is required to fulfill all the elements of the TAM Plan. Each of the subrecipients must have an Accountable Executive—and state DOTs are responsible for coordination among Accountable Executives of each transit system. State DOTs are also responsible for certifying to FTA that a TAM Plan was developed for subrecipients.

**Melonie Choy, MTC**, asked if there was a Group TAM target or whether each subrecipient had to have its own target. "Would you then have layers and layers of targets?" she asked.

Giorgis said a Group Plan would have a Group target. There may be individual subrecipient targets within that, he said, but those targets wouldn't necessarily count as part of the TAM Plan requirements that must be reported to FTA.

**Mike Hubbel, DART**, presented a scenario in which a subrecipient decides to opt-out of the Group Plan. "Does that mean our liability goes away?" he asked. "If they submit a plan that is not acceptable, what's our liability?"

Giorgis repeated subrecipients may opt out of a Group Plan but recipients are required to offer it to them anyway. Once the final rule is implemented, FTA will update its certification and assurances process that comes as part of the master grant agreement. Updates will be issued describing how grant recipients can ensure compliance of subrecipients who opt out.

## **TAM Plan Timeframes**

Plans must be updated at least every 4 years, he said. Initial TAM Plans must be completed no later than 2 years after the effective date.

## **QUESTIONS**

**Bruce Abanthie, VTA**, said that the four year TAM Plan updates were scheduled to be consistent with the Metropolitan Transportation Plan. But some areas go through the transportation planning process every five years. In those cases, can Tier II agencies submit TAM Plans every five years?

Giorgis suggested Abanthie submit his comment to the docket. The way the proposed rule is written, the TAM Plan updates must be done at least every four years, and “that’s fixed for all areas.”

**Yonel Grant, Ch2M Hill**, asked Giorgis whether FTA could provide Best Practices for developing TAM Plans and Group Plans.

Giorgis said that FTA released an Asset Management Guide several years ago that outlines Best Practices and includes templates. FTA is also drafting the Asset Management Guide Light to provide guidance to small, non-rail operators who are developing TAM Plans.

**John Holak, Urban Engineers**, asked if any penalties would be imposed on agencies that don’t meet the two-year requirement.

Giorgis that the deadline is a requirement for federal grant making. It will run alongside many other requirements FTA has for participating in FTA’s grant programs.

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## **D. Performance Measurement**

FTA proposed four SGR performance measures—one for each asset class. FTA proposed an age-based measure for Rolling Stock, based on the percentage of vehicles that have met or exceeded their useful life benchmark (ULB). FTA also

proposed a condition-based approach for facilities, a performance-based approach for infrastructure and an age-related approach for equipment.

The ULB, Giorgis explained, differs from the minimum useful life requirements under FTA's grant programs. FTA for instance, established a 12 year useful-life minimum for a federally funded 40 foot bus. ULB will be a maximum level, taking into account operating environment and maintenance practices.

## **Targets**

Giorgis said annual targets must be established for each asset class. Providers will have some discretion in establishing what asset classes make sense for their own transit systems. Targets should be supported by data based on the most recent conditions available and take into account the provider's financial situation. Targets for Group Plans apply to the group as a whole. Targets must be reported annually to the NTD.

## **QUESTIONS**

**Mike Hubbell, DART**, asked whether obsolescence was mentioned in discussions related to the proposed rule. He said that obsolescence can show up at a moment's notice and substantially impact the ability of an asset to reach a particular useful life benchmark. Half-way through the useful life of a light rail car, for instance, the propulsion manufacturer may say it will no longer make subcomponents of a propulsion system. "When it fails," he said, "the propulsion system does not operate."

Giorgis said FTA did not explicitly consider obsolescence. But the framework FTA established is based around projecting what transit agencies expect to be the useful life of an asset. FTA created flexibility for vehicles with useful life benchmarks that individual transit systems can adjust based on changing conditions or changing knowledge of the technology.

**Melonie Choy, MTC**, commented that there appeared to be flexibility in terms of developing asset classes. Providers who list more than the four asset classes mentioned may end up with many targets. "Is that the intent?" she asked.

Giorgis said right now FTA is not specifying that these are the defined asset classes transit providers have to set targets for. But transit agencies will have to

report targets, particularly within vehicles if dealing with multi-modal operations, and set separate targets for each of the relevant asset classes. “It will be more than four targets you’ll be setting,” he said. Big differences exist between rail vehicles and buses in terms of their useful life benchmarks and in how capital funding is planned and allocated across different modes. Key takeaway: Providers will have to set more than four targets since there will be separate targets for each of the asset classes.

**Melonie Choy, MTC,** asked about FTA’s thought process behind the performance metric for nonrevenue vehicles in the equipment category.

Giorgis said there were many more categories of equipment than just nonrevenue vehicles. Under the law, FTA was obligated to set performance measures for each of the four asset categories. FTA selected to “tackle” the nonrevenue vehicles because it would be “relatively low burden and easy to implement to get performance measure started within the equipment category,” he said.

**Robert Guptill, MBTA,** asked whether the proposed performance metric for equipment was the same as the proposed performance metric for rolling stock.

Giorgis said that the performance metric is the same for both—percentage of revenue within a particular asset class that have met or exceeded their useful life benchmark.

**Robert Guptill, MBTA,** asked about the infrastructure metric FTA uses for performance, defined as percentage of guideway directional route miles with performance restrictions by class. He assumes that by “performance restrictions” FTA does not mean situations like a fallen tree on the tracks.

Giorgis said more guidance will be necessary to pin down the exact definition for consistency. The intent would be to drill down to performance restrictions due to lack of SGR versus any other reason. “In terms of what’s put out in the rule,” he said, “it’s a percent of guideway that has a SGR performance restriction placed on it.” FTA will provide additional guidance and technical assistance on this topic when the rule is implemented.

**Robert Guptill, MBTA,** commented that age and performance are quantitative measures. The condition rating is a qualitative measurement. Could FTA elaborate?

Giorgis said FTA considered the need to issue additional guidance and provide as much consistency as possible. Developing performance measure for buildings was challenging, he said. In the ANPRM, people commented that they struggled with how to measure performance level of buildings, given the different types of buildings. FTA will be releasing additional guidance and technical assistance on how transit systems can assess the condition of buildings.

**Robert Guptill, MBTA**, referred to the condition rating. FTA’s performance metric is a rating below 3. In the TERM Model, anything under the 2.5 level is not considered to be a SGR. How did FTA come up with 3 rating? (Insert answer)

**Nicholas Richter, MTC**, asked whether any work is being done on TERM Lite to “account for real life asset condition ratings.”

Giorgis said FTA is continuing to look at the TERM model and add customization to tailor it to individual transit system. But Giorgis said he didn’t know if that specific feature was currently under development.

**Nicholas Richter, MTC**, commented that he suspected the TERM Lite model would become more popular since it was mentioned in the rulemaking. It’s important to note, he said, that the condition outputted from TERM Lite had slightly different parameters. He suggested including a disclaimer, something along the lines of “not necessary to use straight output from TERM Lite as your condition assessment.”

Giorgis specified that under the proposed rule the performance measure is based on actual condition assessments done by individuals within the transit system. “I believe we proposed a standard in the rule that says that the condition should be re-evaluated every three years for the facilities,” he said.

**Herbert Higginbotham, Accenture**, asked how FTA envisions performance measurements and targets to line up with TAM Plans.

Giorgis said that the bottom line is that every recipient has to set targets—and that no penalties are imposed or awards given depending on compliance. The targets will be reported to the NTD. “The intent is that this target-setting process will inform investment prioritization,” he pointed out. He said he imagined most transit systems would want to set targets within the realm of achievability. “Targets will inform that process and we’ll go from there,” he said.

## **E. Recordkeeping and Reporting Requirements**

### **Annual NTD Reporting Requirements**

Every recipient, Giorgis said, will have to report performance targets for the next fiscal year, describe condition of the assets and provide a narrative report detailing changes in condition and progress toward targets.

### **Recordkeeping requirements**

Transit systems must maintain records supporting TAM Plans and share them with State and Metropolitan Planning Organizations (MPO).

### **Illustration of TAM Timelines**

Initial targets for the performance measures will have to be set within three months after the final rule is issued. The first SGR performance target revision must take place one year after the final rule is issued. The first TAM Plan will be due two years after the final rule is issued. Transit providers will have to submit to NTD a report on their assets' conditions within four months of the end of the Fiscal Year. This deadline corresponds with the NTD reporting deadline for the NTD Annual Report. The first narrative report will be due three years after the final rule is issued.

### **Certification**

TAM plans are self-certified by the Accountable Executive. FTA will update certification and assurances to reflect TAM Plan requirements.

### **Tools**

Giorgis said that technical assistance products are available at [www.fta.dot.gov/sgr](http://www.fta.dot.gov/sgr). A separate webinar will be held on the new NTD asset inventory reporting requirements. FTA already developed an Asset Management Plan and is currently developing a Light version geared toward small, non-rail systems. The agency is working on two guidebooks that will provide guidance on how to assess conditions of facilities.

### **SGR Formula Program**

MAP-21 established a new Section 5337 SGR Formula Grant Program—all projects funded under the group must be included in the grantee's TAM Plan.

## **Next Steps**

The comment period for the NPRM ends November 30, 2015.

FTA asked transit providers for feedback on cost implications, estimating benefits, non-statutory criteria, proposed group TAM plan requirements, proposed deadlines and suggestions on way to analyze the benefits and costs of addressing the SGR backlog.

## **QUESTIONS**

**Mike Hubbel, DART**, asked for clarification on the TAM Plan timelines.

Giorgis emphasized that the requirements will be fitting alongside all the other requirements associated with being an FTA grantee. “We are not proposing as part of the rule a special asset management oversight process that will be different from this,” he said.

**Steve Miller, Golden Gate Transit**, referred to someone else’s question regarding what constitutes an asset under a TAM Plan. Any thought to what FTA would entertain as far as numbers?

Giorgis said that a dollar value was not specified in the proposed rule, other than just stating the asset has to have a useful life of more than one year. In terms of what providers have to put into the asset inventory, “do things at least at the level at which you would program capital projects within our agency’s budgetary process,” he said. That level would differ based on the transit agency’s size. FTA, he said, tried to avoid requiring that every transit system provide the same level of detail in their capital project planning.

**Robert Guptill, MBTA**, pointed out that the performance measures related to age, condition or performance don’t seem to include safety or maintenance. Why not?

Giorgis said that the agency safety plan rule, expected to be issued shortly, will propose safety performance measures. The national safety plan has to directly incorporate the SGR definition FTA is proposing. FTA, he explained, proposed performance measures that are relatively “straight forward, simple and implementable” across a diverse set of transit agencies. Finding the right



performance measure required a lot of thought, he said, and “there isn’t necessarily a performance measure that makes direct connection to safety.”

**Brett Koenig, TRAPEZE**, said that FTA released a White Paper detailing different ways to measure performance. Some agencies used additional data to achieve a higher level of accuracy related to asset conditions, especially in rolling stock. Is there room within FTA’s proposed framework for agencies to incorporate other data elements as long as they meet FTA’s minimum criteria?

Giorgis said yes. FTA recognized its limited ability to set tailored requirements for both large and small agencies so it “tried to keep things simple.” He added that FTA expects some transit agencies will go above and beyond FTA’s requirements in the amount of detail they include in their TAM plans. “We encourage it,” he said.

**John McCormick, BART**, commented that there may be unintended consequences to FTA’s proposed performance measures. “When we approach it (performance measures),” he said, “it’s all about chasing the risk. I haven’t seen the connection back to risk.” He’d rather, for instance, spend more time gathering information about the condition of tracks and rolling stock than investigating the condition of roofs. “Allowing more business focus in how we do this may be more productive,” he said.

Giorgis encouraged McCormick to submit his comments to the docket—describing what the ideal set of performance measures might look like. The performance measures FTA proposed are not comprehensive, he added.

**Darton Ito, SFMTA**, said he understood that Section 5337 funds would be available to develop TAM plans. Would the funds also cover the cost of doing condition assessments and preparing asset inventories?

Giorgis said that the funding covers development of any element of the TAM plan.

**Yonel Grant, Ch3M Hill**, said he understood the linkage between FTA’s safety plan and SGR, but few references were made to risk registers or a risk management approach “that might be formalized or maybe highly encouraged, especially when it comes to project prioritization. Can FTA comment on that?”

Giorgis said that the Federal Highway Administration’s Asset Management Plans are required to have a section on formal risk analysis. “We don’t have that formal

risk analysis section in this proposal,” he said. An analysis of risk will be required when large transit agencies consider prioritization. FTA’s safety plan will require a risk analysis when safety risk has been identified due to lack of SGR in an asset.

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Giorgis thanked participants for attending the session. The meeting was adjourned.