FTA

FEDERAL TRANSIT ADMINISTRATION

King County Metro Transit (KCMT)
FTA ADA Stop Announcement and Route Identification
Review ReporW

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Federal Transit Administration

U.S. Department of Transportation
Federal Transit Administration

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Executive Summary

Objective and Methodology –

KCMT Stop Announcement and Route Identification Program includes the following positive program elements –

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Positive Program Elements

➢ KCMT is implementing an On Board System (OBS) with auto-annunciator (AVA); all buses are equipped with OBS.

➢ KCMT's drivers properly assist and treat individuals with disabilities who use the service in a respectful and courteous way, with appropriate attention to the difference among individuals with disabilities.

➢ KCMT, in cooperation with the Seattle Lighthouse for the Blind, provides an innovative method for communicating with individuals who are deaf-blind; all drivers are trained in this technique.

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KCMT has the following administrative deficiencies that are easily correctable to bring its program into compliance with 49 CFR Parts 27, 37 and 38.

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Administrative Deficiencies

➢ KCMT has not systematically programmed all required and necessary stops into its automated annunciator system (OBS).

➢ KCMT's Eight-Hour Refresher Training does not emphasize the regulatory requirements in 49 CFR Part 37.167 for drivers to announce stops and identify buses.

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KCMT has the following substantive deficiencies that need to be addressed to bring its program into compliance with 49 CFR Parts 27 and 37 and 38.

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Substantive Deficiencies

➢ Stop announcements are not being made at all stops required by 49 CFR Part 37, 37.167(b)(1).

➢ Where buses for more than one route serve the same stop, proper identification of vehicles' routes and destinations is not consistently provided by either automated or driver announcements as required by 49 CFR Part 37, 37.167(c).

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1. General Information

This chapter provides basic information concerning this compliance review of KCMT. Information on KCMT, the review team, and the dates of the review are presented below.

Grant Recipient:	King County KCMT Transit
City/State:	Seattle, King County, Washington
Grantee Number:	1731
Executive Official:	Kevin Desmond, General Manager
On-site Liaison:	David Morrison
Report Prepared By:	Meeting the Challenge, Inc.
Dates of On-site Visit:	August 11 – 15, 2014
Review Team Members:	Kent Kelley, Geoff Ames, Ken Heldt, and Robert Gattis, Jr.

2. Jurisdiction and Authorities

Public entities that operate fixed route transportation services for the general public are required by the U.S. Department of Transportation (DOT) regulations implementing the Americans with Disabilities Act of 1990 (ADA) to make on-board stop announcements on fixed route bus and rail vehicles and to provide an effective means for route identification of vehicles at stops that serve more than one route or line. These regulations (49 CFR Parts 27, 37, 38, and 39) include the requirements to have administrative procedures in place for the prompt and equitable resolution of complaints, and to comply with complaint records retention requirements.

The Federal Transit Administration (FTA) is responsible for ensuring compliance with the ADA and the DOT regulations implementing the ADA. As part of its compliance efforts, FTA, through its Office of Civil Rights, conducts periodic reviews of fixed route transit services operated by grantees. In a letter dated May 15, 2014, FTA notified the King County KCMT Transit (KCMT, known locally as KCMT) that a fixed route review had been scheduled and a site visit would be conducted within 120 days of the date of the letter (Attachment A). The FTA notification letter also explained that the review would consider on-board stop announcements and route identification efforts.

The requirements for stop announcements and route identification are set forth in
49 CFR § 37.167:

> *(b) On fixed route systems, the entity shall announce stops as follows:*
> *(1) The entity shall announce at least transfer points with other fixed routes, other major intersections and destination points, and intervals along a route sufficient to permit individuals with visual disabilities to be oriented to their location.*
> *(2) The entity shall announce any stop on request of an individual with a disability.*
> *(c) Where vehicles or other conveyances for more than one route serve the same stop, the entity shall provide a means by which an individual with a visual impairment or other disability can identify the proper vehicle to enter or be identified to the vehicle operator as a person seeking to ride on a particular route.*

Meeting the Challenge, Inc. of Colorado Springs, CO conducted the review. Geoff Ames served as the review team leader. Other review team members were Kent Kelley, Ken Heldt, and Robert Gattis.

3. Purpose and Objectives

This chapter discusses the purpose and objectives of an FTA ADA Stop Announcement and Route Identification compliance review and the review process.

3.1   Purpose

Pursuant to 49 CFR §§27.19 and 27.123, as part of its oversight efforts, the FTA, through its Office of Civil Rights, conducts periodic reviews of fixed route services operated by its grantees. Compliance with all applicable requirements of the Americans with Disabilities Act (ADA) of 1990 (42 USC 12101-12213), including the DOT ADA Regulations, is a condition of eligibility for receiving Federal financial assistance.

3.2   Objectives

The primary objective of this review is to verify whether a public operator of a fixed route transit agency that benefits from FTA funding is meeting its obligations under the ADA to make on-board stop announcements on fixed route bus and rail vehicles and provide an effective means for route identification of vehicles at stops that serve more than one route or line. This review examines the policies, procedures, practices, and performance of the transit agency's operations; complaint process; maintenance and training programs.

The review team observed operations and maintenance activities, and reviewed records and operating documents. To verify the accuracy of the public operator's reported information and evaluate its methodology, the review team conducted an independent analysis of sample data. In addition, FTA solicited comments from eligible riders and from local disability organizations.

This report summarizes findings and advisory comments. Findings of deficiency require corrective action and/or additional reporting. Advisory comments are statements detailing recommended or suggested changes to policy or practice to ensure best practices under the ADA.

4. Introduction to King County Metro Transit

King County Metro Transit (KCMT) of Seattle, King County, Washington, is the eleventh largest transit agency in the U.S. It provides public transit services in the King County metropolitan areas, which includes numerous cities and villages, among them, Seattle, West Seattle, Kirkland, Bellevue, SeaTac, and Redmond. In addition, KCMT coordinates its services with Community Transit, Everett Transit, Kitsap Transit, Pierce Transit, South Lake Union Streetcar, and Washington State Ferries, at the boundaries of King County. KCMT also coordinates with Sound Transit's Link light rail service within King County. KCMT provides standard fixed route bus, RapidRide bus rapid transit, a vanpool program, and ADA complementary paratransit service. Approximately 2,045,000 people live in the KCMT service area, which covers approximately 2,115 square miles. According to a 2011 American Community Survey, in Seattle, 22.2 percent of people with disabilities commute by public transit.

RapidRide, KCMT's bus rapid transit serves some of the County's busiest travel corridors. KCMT launched the last of six lines in June 2014, and ridership is soaring as customers enjoy RapidRide's fast, frequent service throughout the day. In addition to KCMT's regular local services and its RapidRide buses, there are nine Express routes and four Night Owl routes. Local routes typically run on 15 minute headways. KCMT also supports commuters by maintaining 130 Park & Ride lots that are used by almost 20,000 people daily. KCMT adult single zone peak travel fare is $2.50.

4.1   Introduction to Services and Organizational Structure

KCMT services operate seven days a week. Some of its RapidRide and express routes operate twenty-four hours a day, seven days a week. Local routes typically operate from around 5 a.m. until 1 a.m. KCMT's four Night Owl routes operate nightly between roughly 2 a.m. and 4:30 a.m. At the time of the on-site review, KCMT operated 197 fixed bus routes directly and none through contractors. On an average weekday, KCMT bus ridership totals approximately 325,000; FY 2013 bus ridership totaled 118.6 million. At the time of the on-site review, KCMT's Dial-a-Ride Transportation (DART) and ADA paratransit ACCESS service were operated by contractors.

Of the KCMT fleet of 1,358 buses, all are equipped with Automatic Voice Annunciation (AVA), which makes both on-board stop announcements and external route identification announcements (see Attachments K and N). The system also includes a scrolling visual display of all stops inside the bus. KCMT refers to this integrated announcement system, provided by INIT, Inc., as its On-Board System (OBS). Fleet installation began in 2010, with the first operational use of the system beginning in early October 2010 on KCMT's RapidRide A line. KCMT has yet to approve work performed under its contract with INIT, Inc. INIT is sending an audio engineer to complete final adjustments to the OBS in the near future.

KCMT will begin reduction of its service hours by 161,000 hours of bus service effective September 27, 2014, due to budgetary constraints. Only 55 of KCMT's fixed routes are anticipated to remain unchanged by the service reduction.

5. Scope and Methodology

The purpose of this review is to provide FTA with a tool for determining whether a public operator of a fixed-route system is in compliance with the DOT ADA regulatory requirements found in 49 CFR Part 37 governing on-board stop announcements on bus and rail vehicles and route and line identification of vehicles at stops that serve more than one route or line. However, the deficiencies identified and findings made in this report are by necessity limited to the information available to and the observations made by the review team at the time of the site visit. A lack of findings in a particular review area does not constitute an endorsement or approval of an entity's specific policies, procedures, or operations. Instead, it simply indicates that no deficiencies in the delivery of service were observed at the time of the review.

The scope of the review and the methodology employed by the review team are described in greater detail below.

5.1   Scope

The review focused on whether the KCMT makes the required on-board stop announcements on fixed route bus vehicles and provides an effective means for route identification at stops that serve more than one route or line.

Overall, the stop announcement and route identification compliance review included the following regulatory requirements:

- Complaint resolution and compliance information (49 CFR §§ 27.13(b) and 27.121(b))
- Nondiscrimination (49 CFR § 37.5)
- Service under contract (49 CFR § 37.23) (if applicable)
- Training requirements (49 CFR § 37. 173)
- Maintenance of accessibility features (49 CFR § 37.161)
- Stop announcements (49 CFR § 37.167 (b))
- Route identification (49 CFR § 37.167 (c))

5.2   Methodology

The FTA Office of Civil Rights sent a notification letter to KCMT's General Manager, Kevin Desmond, on May 15, 2014, confirming the time frame for the review and requesting KCMT to send information to the review team within 21 days of the date of the notification letter. (Attachment A).

Prior to the on-site visit, the review team examined the following information:

- KCMT's description of how its fixed route service is structured
- Public information describing KCMT's fixed route service
- Fixed route bus fleet roster
- Stop lists or other information provided to operators
- Information describing the methods KCMT uses to make stop announcements and route and line identifications
- Information describing any technology KCMT uses to make stop announcements and route and line identifications (see Attachment N)

- KCMT's documentation notifying operators, supervisors, mechanics, technicians and other transit personnel regarding stop announcement and route and line identification procedures, policies, and maintenance requirements (see Attachment M)
- KCMT's training materials for operators, supervisors, mechanics, technicians and other transit personnel regarding stop and route and line identification announcements, and maintenance of vehicle announcement equipment (see Attachment F)
- KCMT's documentation regarding stop and route and line identification and route identification announcement monitoring activities and results
- KCMT's list of complaints related to stop announcements and route and line identification filed with KCMT in the past year (see Attachment E)

As requested by FTA, KCMT made additional information available during the visit:

- Copies of KCMT's most recent policies, procedures, and maintenance requirements regarding stop announcements and route and line identification
- Copies of any materials distributed to transit staff, including mechanics and information technology personnel, regarding stop and route and line identification policies, procedures, and requirements
- Sample forms that KCMT uses to record monitoring of employee and contractor compliance with stop announcement and route and line identification announcement requirements
- Copies of KCMT's current policies and procedures regarding complaint recording, documentation, handling, and retention; policies and procedures for handling ADA-related complaints

The on-site review of KCMT took place from August 11 to August 15, 2014. On the first day, review team members conducted, recorded, and tabulated covert stop announcement and route and line identification observations made in the field (see Attachments I and J). On the second morning, one review team member conducted, recorded, and tabulated additional route and line identification observations made in the field. An opening conference was held at KCMT's headquarters at 201 S. Jackson Street, Seattle, Washington, on Tuesday, August 12, 2014. As part of this meeting, the review team presented a proposed schedule for the remainder of the site visit (see Attachment B). The following people attended the meeting:

Melony Joyce	KCMT Accessibility Planner
Brad Kittredge	KCMT Transit Systems Operations Manager
Heather Kilbourn	KCMT Superintendent
Rob Gannon	KCMT Deputy General Manager
Maggie Haltr	KCMT Chief, Vehicle Maintenance
David Morrison	KCMT Grants Administrator
Anita Heard	FTA Office of Civil Rights (by phone)
Christopher MacNeith	FTA Region X Civil Rights Officer (by phone)
Geoff Ames	Meeting the Challenge, Review Team Leader
Kent Kelley	Meeting the Challenge, Project Manager
Ken Heldt	Meeting the Challenge, Reviewer

Following the opening conference, the review team met with KCMT staff to discuss the information sent in advance as well as the information and material that was available on site,

along with KCMT's policies and procedures. For the remainder of the day, the Review Team Leader discussed the process in place at KCMT to record and respond to customer complaints and requested complaint data from the past year. Other review team members began quality control and organization of data collected in the field.

On Wednesday, August 13, 2014, the review team collected data and interviewed operators, supervisors, managers, and technical staff at KCMT to learn more about the policies, procedures, and practices regarding stop announcements, route IDs, and route and line identification announcements. Bus operators came to KCMT headquarters to provide information regarding their knowledge of KCMT policies and requirements, and the training they received. The Review Team Leader interviewed KCMT managers regarding maintenance, employee training, monitoring to oversee compliance, and any disciplinary actions taken. KCMT information technology personnel and maintenance were interviewed to obtain information about the agency's AVA equipment installation and management policies, procedures, and practices.

The review team paid particular attention to whether discrepancies existed between KCMT policies and observed day to day practices regarding stop announcements, route and line identification announcements, maintenance of accessibility features, and complaint handling. In addition, the review team observed whether or not KCMT made the required announcements, maintained the automated systems installed to provide such announcements, and made the required announcements if the automated system was inoperable.

The review team gathered and analyzed the following information:

- Comments from riders and advocates through telephone interviews, and through a review of the comments and complaints on file at KCMT (FTA reported no complaints on file)

- Complaint reports prepared by KCMT showing the number, type, and resolution of stop announcement, route ID, and route and line identification complaints

- Direct observations of the handling of stop announcements and route and line identification announcements by review team members, and interviews with KCMT operators and managers about the agency's training regarding stop announcements, route IDs, and route identification announcements, monitoring, and discipline

On Wednesday and Thursday, August 13 and 14, 2014, the review team tabulated the various data that had been gathered and prepared for the exit conference.

The exit conference took place at 8:30 a.m. at the KCMT office. Attending the conference were:

Rob Gannon	KCMT Deputy General Manager
Michael List	KCMT Transit Operations Manager
Heather Kilbourn	KCMT Superintendent
David Morrison	KCMT Grants Administrator
Melony Joyce	KCMT Accessibility Planner
Tim Reutebuch	KCMT Analyst (SDO)
Geoff Ames	Meeting the Challenge, Review Team Leader
Kent Kelley	Meeting the Challenge, Project Manager
Ken Heldt	Meeting the Challenge, Reviewer

5.3 Stakeholder Interviews

This section discusses information on the service or policy issues resulting from interviews with representatives from the local disability community and local disability advocacy organizations concerning the subject of this review. Prior to the site visit, the Review Team Leader, Mr. Ames, interviewed seven individuals with disabilities. Interviewed individuals represented the National Federation of the Blind of Washington (NFBW), the Washington Council of the Blind (WCB), the Seattle Lighthouse for the Blind, and the Seattle Commission for People with Disabilities. One of the NFBW members is also a member of the Transit Riders Union and one of the WCB members is a former member of the Transit Advisory Commission. One of the interviewees uses a wheelchair and is not blind or visually impaired. Four interviewees are totally blind and two have low-vision (see Attachments C and D, customer interview forms).

The questions asked in the interviews were:

- How would you describe your experience with stop announcements on KCMT buses?

- At bus stops that serve more than one route are external route identification and destination announcements made so that you can readily board the right bus?

- Have you ever filed a complaint to KCMT about stop or route identification announcements? If so, do you have documentation? Do you feel that your complaint was resolved to your satisfaction?

- Do you have any other comments about KCMT service?

There is general consistency between the different interviews with regard to particular issues. While none of the interviewed subjects provided documentation of a complaint submitted to KCMT, one of the interviewed individuals did provide the URL for a blog post that she had written in August of 2010, recounting a successful complaint regarding access at a bus stop. The following questions were identified during the interviews:

- Stop announcements
  - Frequent enough ("to be oriented to… location")?
  - Loud enough?
  - Slow enough?
  - Clear enough (does driver have a foreign accent)?
  - Timed sufficiently ahead of stops?
  - Audible for same stops as visible display?
  - Made for special requests?
- Route/bus IDs
  - Provided without asking drivers?
  - Clear when multiple buses are in "zone" at same time?
  - Do buses come to the stop point in the "zone" before leaving?
- Other

- Do drivers request other passengers to leave priority seats for people with disabilities?
- Is the on-line complaint process accessible/usable by individuals who are blind?

The comments of interviewed individuals informed subsequent field observations by the review team. Concern expressed by interviewed individuals, specific to whether enough stops are announced to allow individuals to orient themselves to their location, suggested observing and tracking the number of consecutive stops without announcements, as part of the review team's assessment. Comments suggesting that drivers forget to announce stops that have been specially requested informed both on-board observations and operator interviews. The interviewee's descriptions of the circumstances in which multiple buses arrive at a stop simultaneously prepared the review team for the difficulty of finding the right bus in the absence of external route ID announcements.

The outcomes experienced and reported by interviewed individuals can be summarized as:

(1) traveling to a stop one or more stops beyond the individual's desired stop or;

(2) missing one bus and having to wait for the next bus on the desired route.

Individuals identified sitting in priority seats as a strategy to facilitate communication with drivers and ensure that needed stops are announced. The six interviewed subjects who are blind or visually impaired related that other passengers waiting for buses are frequently helpful in identifying the right bus in the absence of route ID announcements. In spite of the difficulties encountered due to stop announcement and route ID deficiencies, all of the interview subjects expressed preference for the use of KCMT's fixed route transit over ADA paratransit service.

6. Findings and Advisory Comments

This chapter details the findings for each of the areas pertinent to the regulations found in 49 CFR Sections 27 and 37 and 38 outlined in the Scope and Methodology section above. For each area, an overview of the relevant regulations and a discussion of the regulations as they apply to KCMT's fixed route service are provided below, with corrective actions and a timetable to correct deficiencies for each of the requirements and sub-requirements, where necessary.

Findings are expressed in terms of "deficiency" or "no deficiency." Findings of deficiency denote policies or practices found to be not in compliance with the DOT ADA regulations or matters, for which FTA requires additional reporting to determine whether an ADA compliance issue exists.

Findings of deficiency shall always require corrective action and/or additional reporting, and will always be expressed as:
- A statement concerning the policy or practice in question at the time of the review
- A statement concerning the DOT ADA requirements being violated or potentially being violated
- A statement concerning the required corrective action to resolve the issue

Advisory comments are statements detailing recommended or suggested changes to policies or practices to ensure best practices under the ADA or otherwise assist the entity in achieving or maintaining compliance.

6.1   Complaint Resolution and Compliance Information

Requirement: Under 49 CFR § 37.5, transit agencies must not discriminate against an individual with a disability in connection with the provision of transportation service, or deny any individual with a disability the opportunity to use the transportation services it provides to the general public. The agency must provide service to persons with disabilities in the most integrated setting possible. Discriminatory practices include and are not limited to requiring the use of alternate transportation services rather than fixed route service; requiring persons with disabilities to be accompanied by an attendant; imposing special charges upon people with disabilities; and requiring people with disabilities to use designated priority seating.

Under 49 CFR § 27.13(b), the transit agency must have administrative procedures in place that incorporate appropriate due process standards and provide for the prompt and equitable resolution of complaints. Under 49 CFR § 27.121(b), the agency must keep all complaints of noncompliance on file for one year and a record of all such complaints (which may be in summary form) for five years. Establishing these policies and procedures is the responsibility of the transit agency, not its contractors.

Note: While requirements to respond to complainants are not included in the DOT ADA regulations, it is a common and effective practice for a transit agency to respond to complainants and for transit agencies to investigate allegations to ensure that all DOT ADA requirements are being met. If the transit agency has not established these policies and procedures, review team members shall include them as advisory comments.

Discussion: During this compliance review, no deficiencies were found with the requirement to resolve complaints promptly and equitably and keep summaries and records of complaints on file

or with how the transit agency communicates its complaint policies and procedures to customers. However, interviews of individuals with disabilities, most (six of seven) of whom are blind or visually impaired, caused concern, as those individuals expressed reluctance to file formal complaints for one or both of two reasons. The first reason was the perception of interviewed individuals that filing a complaint might have negative consequences for a particular driver, but would not bring about needed systemic change. The second reason was the difficulty of filing an on-line complaint in a form that has a required field asking for *bus number* (which typically cannot be seen from the sidewalk by individuals who are blind or visually impaired). It appears that the on-line form was either misunderstood or has been corrected, as it now instructs users "If unknown, enter a zero." A brief description of the two essential difficulties reported by individuals with disabilities is that 1) the number of stop announcements is not sufficient to provide orientation to location and 2) route identification is routinely unavailable at stops used by multiple routes. As KCMT has provided numerous documented complaints, this comment is advisory.

From the middle of May 2013, until the end of the year, three complaints were specifically directed at the OBS in regard to provision of stop announcements or route identification. Two of these (#3780261 and #3925387) were submitted by individuals who are blind and one (#3777231), (see Attachment E) by the Transit Riders Union. The individuals who are blind each requested the addition of specific stops/locations to the OBS. The Transit Riders Union submitted a letter, on June 19, 2013, requesting a meeting to discuss the following issues:

(1) Stop announcements that are unpredictable

(2) Not enough stop announcements

(3) Announcements are not loud enough

(4) Timing is off

(5) Announcement of reroutes

(6) Problems with route announcements at bus stops

(7) ORCA Card readers (beeps [during] announcements)

KCMT has demonstrated consistently positive action in adding stops to the OBS in response to passenger complaints and requests for additional stop announcements to be programmed in OBS. KCMT's complaint resolution for the letter from the Transit Riders Union indicates that KCMT replied in writing on the same day that the letter was received. The review team was not provided with a copy of the reply letter. There is no documentation of a meeting or other interaction with the Transit Riders Union to address the issues raised in the Transit Riders Union's letter.

Most complaints in 2014 have been with regard to announcements (internal and external) that are too loud. As of May 13, 2014, only two complaints are specifically directed at the OBS in regard to the provision of stop announcements or route identification. Apparently, neither of these two complaints was submitted by an individual who is blind or reports having a disability. One complaint (#3943726) reports the failure of the visual stop displays and driver failure to make voice or PA announcements. The other complaint (#3972321) reports a "mislabeled bus"; that is, the external route display incorrectly identified the route and neither the OBS nor the driver had made a route identification announcement. These complaints were resolved through ongoing efforts to complete the implementation of the OBS. Significantly, these complaints make clear

that announcements made by drivers and the OBS provide a fundamental customer service for all passengers, not just those with disabilities.

6.2   Stop Announcements

Requirement: Under 49 CFR § 37.167 (b), on fixed route systems, the entity shall announce stops as follows:

(1) The entity shall announce at least at transfer points with other fixed routes, other major intersections and destination points,

(2) The entity shall announce any stop on request of an individual with a disability.

The transit agency must establish policies and procedures for stop announcements. The DOT ADA regulations do not require transit agencies to equip vehicles with an automated announcement and/or route identification system. Instead, the regulations require the transit agency to make all required stop announcements and to ensure operators announce stops requested by a person with a disability. In the event that an automated system is inoperable, not used, or not installed on the vehicle, the operator remains responsible under the DOT ADA regulations to make announcements at intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location. The transit agency must not limit provision of stop announcements to those customers who, in the operator's opinion, need the announcement.

The vehicle operator remains responsible under the DOT ADA regulations to make the required stop announcements in the event that an automated system malfunctions, the operator does not use the system, or no system was installed on a particular vehicle.

The transit agency must monitor the performance of its operators and drivers in making stop announcements.

Discussion: During this compliance review, deficiencies were found with the requirements for making stop announcements. During covert rides, review team members observed 932 bus stops, stations, and transit centers on 38 different routes. KCMT had programmed 388 of those stops to be announced, by the following types:

- 222 at transfer points
- 71 at major destinations
- 43 at major intersections
- 52 at other stops (to provide orientation to location)

Of these 388 stops, 345 (89 percent) were announced, by the following types:

- 194 at transfer points (87 percent of the total transfer points)
- 68 at major destinations (96 percent of the total major destinations)
- 41 at major intersections (65 percent of the total major intersections)
- 42 at other stops, to provide orientation to location (81 percent of the total other)

Of the 345 stop announcements heard, 340 (99 percent) were automated and the other five were made by operators using the PA system. Neither the OBS nor bus operators made stop announcements for the other 43 stops (11 percent) that are programmed in the system.

The review team objectively identified an additional 275 stops, serving more than one route or line, not included in the number of stops programmed to be announced in the OBS. By definition, these stops are transfer points. In total, the review team identified 497 transfer points among the 932 bus stops, stations, and transit centers observed. 209 (42 percent) of these stops were announced and 288 (58 percent) were not.

The review team subjectively identified an additional 17 stops considered to be major destinations. In total, the review team identified 88 major destinations, including the 71 programmed into the OBS. 72 (82 percent) of those stops were announced and 16 (18 percent) were not.

The review team subjectively identified an additional 73 stops considered to be major intersections. In total, the review team identified 116 major destinations, including the 43 programmed into the OBS. 46 (40 percent) of those stops were announced and 70 (60 percent) were not.

Stop announcements were heard at 47 other stops (46 of those were automated announcements). These stops were not considered to be transfer points, major destinations, or major intersections. It is presumed that these announcements were added either to permit orientation to location or at the specific request of passengers or operators.

The review team, though acknowledging that these observations are somewhat arbitrary, believes that a significant number of the locations considered to be major destinations or intersections ought to be designated ADA stops in KCMT's OBS.

In summary, the review team identified, as required or otherwise considered, a total of 701 of the 932 stops observed as transfer points, major destinations, or major intersections. Only 327 (47 percent) of those 701 stops were announced. Of those 701 stops, KCMT's OBS identified only 336 (48 percent) as stops required to be announced (see Attachments O, S, and T).

The review team observed no requests for stops in addition to automated stop announcements. However, interviewed individuals with disabilities consistently reported that drivers often forget to announce specially requested stops. The conjecture given by individuals with disabilities is that with the advent of the OBS drivers are no longer "in the habit" of announcing stops by voice or PA. Drivers interviewed indicated that recently hired drivers (i.e., those hired since the installation of the OBS) have had virtually no practice or experience of making any stop announcements and may not even know which stops to announce as ADA stop lists are no longer available to drivers for all routes.

The review team concludes that KCMT is not providing all required stop announcements. KCMT's OBS has not been programmed to announce all the stops that can be described as transfer points, major destinations, or major intersections. All designated ADA stops (in the OBS) are not automatically announced. There is little evidence to indicate that drivers are consistently making stop announcements when the OBS fails to make automatic announcements. KCMT is deficient in providing required stop announcements.

Corrective Action Schedule: Within 180 days of the issuance of the final report, KCMT must systematically enter all stops defined as transfer points, major destinations, or major intersections into its OBS. Within 60 days of the issuance of the final report, KCMT must provide drivers with lists of all stops to be announced.

6.3   Orientation Announcements

Requirement: Under 49 CFR §37.167 (b), on fixed route systems, the entity shall announce stops as follows:

（1）The entity shall announce at least at transfer points with other fixed routes, other major intersections and destination points, and intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.

（2）The entity shall announce any stop on request of an individual with a disability.

The transit agency must establish policies and procedures for an effective means of route identification. The DOT ADA regulations do not require transit agencies to equip vehicles with an automated announcement and/or route identification system. Instead, the regulations require the transit agency to ensure that operators make stop announcements, route IDs, and route identification announcements for everyone and, in addition, to ensure that whenever a customer with a disability requests it, operators announce a stop. If an automated system malfunctions, the operator does not use the system, or the vehicle is not equipped with such a system, the operator remains responsible under the DOT ADA regulations to make announcements at intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location. The transit agency must not limit the provision of stop announcements and route identifications to those customers who, in the operator's opinion, need the announcement.

The transit agency must monitor the performance of its operators and drivers in making stop announcements, route IDs, and route identification announcements.

Discussion: During this compliance review, deficiencies were found with the requirements for making orientation announcements. With regard to the requirement to announce stops at "intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location", 26 of 51 route segments observed had five or more consecutive stops that were unannounced. Eight of those 26 route segments had eight or more consecutive stops that were unannounced. For one route segment, 17 of 17 stops observed went unannounced. The review team documented 11 of 51 route segments where the percentage of stops announced ranged from zero to 26 percent.

KCMT staff presents no systematic or proactive methodology for determining which stops to announce in order to sufficiently "permit individuals with visual impairments or other disabilities to be oriented to their location." Stop announcements are made for ten of 15 stops following the stop nearest to the Seattle Lighthouse for the Blind, on bus route 7. However, staff reports that in neighborhoods where passengers who are blind are not expected to be on the bus, few stops are announced unless specific requests are made. It is not evident that consideration was given to ensure that enough stops, to allow orientation to location, would be programmed in the OBS. At best, the methodology for programming stop announcements is reactive.

The review team concludes that KCMT does not have enough stop announcements in its OBS to meet the requirement for orientation to location. A consistent perception of interviewed individuals with disabilities is that the number of stops being announced is not sufficient to allow individuals to orient themselves to their location. Observations recorded by the review team provide considerable evidence to confirm the perception of interviewed individuals with disabilities that the number of stops being announced is not sufficient to allow individuals to

orient themselves to their location. The review team finds KCMT to be deficient in meeting this requirement (see Attachment Q).

Corrective Action Schedule: Within 180 days of the issuance of the final report, KCMT must review stops programmed for announcements in its OBS and enter additional stop announcements to provide a number of stops sufficient to permit individuals to orient themselves to their location. KCMT must solicit input from the community, including people who are blind, who have visual impairments, and who have cognitive impairments, to ensure that the needs of these populations are met with regard to fixed route public transit service.

6.4   Route Identification

Requirement: Under 49 CFR § 37.167 (c), where vehicles or other conveyances for more than one route serve the same stop, the entity shall provide a means by which an individual with a visual impairment or other disability can identify the proper vehicle to enter or be identified to the vehicle operator as a person seeking to ride on a particular route.

Appendix D to 49 CFR § 37.167 explains: "The rule does not prescribe what means is to be used, only that some effective means be provided." Means of making route identification announcements can include installing automated annunciator systems on vehicles, or deploying street supervisors or passenger services personnel at transit hubs to assist customers. Appendix D continues: "The idea is to prevent, at a stop where vehicles from a number of routes arrive, a person with vision impairment from having to ask every driver whether the bus is the right one." The vehicle operator must make route IDs and route identification announcements.

Discussion: During this compliance review, deficiencies were found with the requirements for route identification. Sixty buses were observed at 41 different stops that serve two or more routes. Of those 60 buses, six (10 percent) were heard providing external route identification announcements. Of those six announcements, only two were considered by the review team to be sufficiently loud enough to be understood. Not one of the six external announcements was considered to be too loud for the environment. The documented external announcement of route identifications includes only those instances where a review team member was stationed at a stop for the specific purpose of observing route identification performance or when a review team member had time to record routes and numbers of buses while waiting for buses (for stop announcement review route segments). However, review team members report that virtually no route identification announcements were heard while waiting to board buses at stops serving multiple routes. This observation coincides with comments made by most interviewed individuals prior to the on-site visit (see Attachment P).

It is not clear whether the significant absence of external route identification announcements is evidence of a technical problem with the OBS or some other factor. Staff and drivers report that it is possible and has been suggested to drivers that the external speakers can and should be defeated in quiet residential neighborhoods. No drivers were observed switching off external speakers. Regardless, when required external route identification announcements are not made automatically by the OBS, it is the responsibility of drivers to make those announcements so that individuals at those stops are effectively informed of the route and destination served by that bus. It is understood from KCMT technical staff that external route announcements are programmed to begin as a bus's door is opened and repeat every thirty seconds thereafter as long as the door is open. Drivers, when hearing no external announcement as the door is opened, are required to

make the route identification announcements so they can be heard by all individuals waiting at any bus stop serving multiple routes.

The review team concludes that KCMT consistently fails to provide required external route identification announcements, based on the number documented external route announcements, casual observations, and comments from interviewed individuals with disabilities. The review team finds KCMT to be deficient in meeting the requirement to identify routes and destinations of buses at stops that serve multiple routes.

KCMT provides additional means of route identification for individuals with difficulty with navigation. Bus ID kits are available with colors to indicate the type of disability: White is for customers who are blind and yellow for customers who are deaf/blind. KCMT also implemented a program to use the *Print on Palm* method to print the route number on the open palm of individuals who are deaf-blind. The driver then places the individual's hand in the crook of his arm and guides the individual to the bus and an appropriate seat. Little information is provided regarding the frequency of use of these cards, but it is understood that these cards are primarily used by individuals who are deaf/blind. This process was developed and presented to drivers in a collaborative training effort with The Seattle Lighthouse for the Blind.

There was no mention of this program in interviews with individuals with disabilities conducted prior to the site visit. Neither was the existence of this special program and training for it reported by drivers during on-site interviews. While this program does provide "a means by which an individual with a visual impairment or other disability can identify the proper vehicle to enter or be identified to the vehicle operator as a person seeking a ride on a particular route," its benefits are limited to those individuals for whom it was specifically developed.

KCMT continues to have difficulty with controlling the volume level of both interior and exterior speakers. The system is designed for interior speakers to self-adjust volume, within a pre-set range, by means of a feedback loop. When internal background noise on the bus is loud, stop announcement volume is intended to increase automatically. The review team observed that internal speaker volume was sometimes too low particularly on older buses. This perception was confirmed by KCMT staff remarks. It is expected that INIT's audio engineer will complete final and effective adjustments to the feedback loop so that stop announcements will be neither too loud nor too soft, except on the older buses that have speakers that are not capable of consistently producing sufficient volume.

The review team members had limited observations of external speaker performance. However, from a review of complaints related to the OBS, it is understood that excessive exterior speaker volume has been an ongoing problem for KCMT since the OBS was introduced. There is no feedback loop to self-adjust the external speakers. Therefore, once the volume is set in the system, the exterior speakers cannot self-adjust relative to the ambient sound level in the environment.

Apparently, as a result of complaints from members of the public who live near bus stops, two means of resolving complaints have been tested. First, external speaker volume was globally adjusted in the system to be lower from late evening through early morning hours. Second, bus operators manually defeat the external speakers when driving through quiet residential neighborhoods. Drivers explained that they cannot raise or lower the volume of external speakers. They can only switch them on or off. In interviews, drivers and other KCMT staff

indicated that when using this second method, drivers sometimes forget to switch on the external speakers when leaving quiet residential neighborhoods.

KCMT intends to apply recommendations of this ADA compliance review before completing the contract. In addition, KCMT will be replacing its oldest buses and trolleys which have antiquated audio systems. Original plans had been to replace these buses prior to installation of the OBS. However, due to budget considerations, purchase of replacement buses was postponed to 2014.

Corrective Action Schedule: Within 180 days of the issuance of the final report, KCMT must reprogram its OBS to automatically make external announcements identifying the route and destination of buses at stops that serve multiple routes. In addition to making changes to the OBS, within 60 days of the issuance of the final report, KCMT must demonstrate that it has a policy, enforced through training and disciplinary measures, to ensure that drivers consistently identify routes and destinations when the OBS fails to do so.

6.5　Training

Requirement: Under 49 CFR § 37.173, each public or private entity which operates a fixed route or demand responsive system shall ensure that personnel are trained to proficiency, as appropriate to their duties, so that they operate vehicles and equipment safely and properly assist and treat individuals with disabilities who use the service in a respectful and courteous way, with appropriate attention to the difference among individuals with disabilities.

Even if the transit agency has equipped all or a portion of its fleet with an automated announcement system, operators must still be trained and prepared to make the required stop announcements and route identifications. Drivers must announce any stop requested by a passenger with a disability. The DOT ADA regulations require that drivers make stop announcements, route IDs, and route identification whether or not the vehicle features an automated system, and no matter whether that system functions. Even when an entire vehicle fleet uses an automated system, the automated system may stop working during a run, or a bus with a non-operational automated system may be assigned to a run. Drivers must be trained to proficiency on their responsibilities to announce stops and identify routes. If the transit agency installs this equipment, drivers must also learn to use the announcement system to make the required announcements and route identifications.

Discussion: During this compliance review, deficiencies were found with training requirements. Deficiencies in meeting requirements to announce stops, bus routes, and destinations indicate that drivers have not been thoroughly trained to provide announcements when the OBS fails to make announcements automatically. Anecdotal accounts, from interviewed individuals with disabilities who use KCMT's fixed route system, indicate that the lack of internal and external announcements contribute significantly to their difficulty in accessing and navigating KCMT's fixed route buses. Interviewed individuals did not indicate that these difficulties prevented them from using the fixed route system. However, on occasion, the absence of consistent and sufficient stop announcements has resulted in traveling beyond desired stops. The absence of effective external route identification announcements often means missing a bus and having to wait for the next one. In addition, individuals with disabilities consistently report that drivers forget to announce specially requested stops.

There is some concern that drivers, especially those who have been hired since the implementation of the OBS began, have become overly reliant on automated announcements.

Recently hired drivers have little practical experience with making announcements, as the OBS has been in operation on most buses for most or all of their driving history at KCMT. Interviewed drivers report that lists of stops required to be announced are no longer provided for all routes. While experienced drivers (i.e., those who began driving for KCMT prior to 2010) profess knowledge of the stops required to be announced, review team members documented only eight of the 932 stops reviewed where drivers provided either a voice or PA announcement of the stops.

One KCMT ADA Trainer explained a technique he uses to help drivers remember to make specially requested stop announcements. He suggests that the driver use a dry erase marker to write the requested stop on the left-side window where it will serve as a reminder each time the driver looks at his mirror. The driver can then wipe the reminder off the window after announcing the stop.

In the pamphlet, "Eight-Hour Refresher Training for KCMT Transit Operators," there is no content specifically or directly addressing the requirement for operators to announce stops or announce route identification and destination in the absence of automated announcements. While there is significant content addressing the need to understand invisible disabilities, interviewed drivers consistently related that they predicate, to some extent, stop announcements, and to a great extent, external route identification and destination announcements on the presence of individuals who are blind or have other observable disabilities. This conception, apparently held by well-meaning drivers, indicates that interviewed drivers do not have a thorough understanding of the regulatory requirements (see Attachments G, H, and L).

The need for training of technical staff is apparent from the inconsistency between the requirements for stop announcements and external route identification and destination announcements and the announcements actually programmed (per on-bus observations) into KCMT's OBS. Subsequent to the site visit, KCMT provided their *Enunciator System Manual* (see Attachment U) to the review team. This manual describes the logic model used to generate automated stop announcements. The manual prescribes a process for designating stops for announcement complying with the DOT regulation. The manual would have been very useful during the on-bus stop announcement observation phase of the review. The technical staff is responsive to customer requests to add stop announcements to the OBS.

Drivers demonstrate a positive attitude and willingness to be helpful, respectful, and courteous. This translates to the practice of announcing stops and identifying their bus's route and destination for individuals whom they recognize as being blind or having another disability. If an individual's disability is not apparent to drivers, she may not receive the additional assistance provided by drivers to people with an apparent disability.

The effects of many disabilities, including but not limited to low-vision, cognitive, or developmental disabilities, are not always visible or apparent. For example, individuals with low-vision often can navigate successfully without a white cane or a dog guide; however, they cannot read route signs on buses. Drivers must be trained to understand that stop and route identification announcements must be made systematically and consistently (even if/when the automated system fails), at all times, and not only when they perceive the need based on their own observations.

Training, or enhanced communication between technical staff and drivers, is needed to help drivers understand the operational capacities of the OBS. Interviewed drivers were not aware of

the process by which they can request the addition of stop announcements to the OBS (see Attachment L). The most frequent complaints about the OBS have been from residential neighborhoods (often served by a single route). Residents complain that the external announcements are too loud. In response to these complaints, some drivers defeat the external announcements in these locations, often neglecting to reactivate the external announcements where they must be made.

The review team concludes that KCMT does not provide adequate training for operators and technical staff. Based on training materials and policies presented to the review team, the training curriculum must be improved to more accurately convey the regulatory requirements. Drivers and technical staff must understand the reasons for providing stop and route identification announcements in order to perform their respective duties to proficiency.

Corrective Action Schedule: Within 90 days of the issuance of the final report, KCMT must review and revise training materials to fully explain and emphasize the specific requirements for stop announcements and route identification and destination. Upon completion of the review and revision of training materials, KCMT must initiate comprehensive refresher training for all bus operators and technical staff responsible for the design, programming, and operation of KCMT's OBS.

6.6   Maintenance of Accessible Features: General

Maintain in Operative Condition

Requirement: Under 49 CFR § 37.161(a) it states: "Public and private entities providing transportation services shall maintain in operative condition those features of facilities and vehicles that are required to make the vehicles and facilities readily accessible to and usable by individuals with disabilities. These features include, but are not limited to, lifts and other means of access to vehicles, securement devices, elevators, signage, and systems to facilitate communications with persons with impaired vision or hearing."

Transit agencies must maintain in operating condition the public address (PA) systems used to announce stops aboard their buses[1], their stop and route identification signs, and other accessibility equipment. Effective repair and preventive maintenance programs are key to keeping accessibility features in good working order. Appendix D to 49 CFR § 37.161 notes: "It is not sufficient to provide features such as lift-equipped vehicles, elevators, communications systems to provide information to people with vision or hearing impairments, etc. if these features are not maintained in a manner that enables individuals with disabilities to use them."

Discussion: During this compliance review, no deficiencies were found with the requirements concerning maintenance of accessibility features. However, an advisory comment is made regarding this requirement. Some difficulty was observed with the audibility of stop announcements inside buses. Of 374 stops announcements, only 28 (7 percent) were documented as either partially audible (22) or not audible (6). It is not clear whether the insufficient volume level was the result of improperly calibrated output from the OBS, due to aging speakers on older buses, or a combination of both factors. The lack of sufficient volume and clarity of announcements was noted on eleven different buses, but not for every stop that was announced

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[1] Under 49 CFR 38.35, public address systems are required for buses in excess of 22' in length used in multi-stop, fixed route service,

on any of those buses. Typically, the buses with audio output quality problems are among the oldest in KCMT's fleet (see Attachment R).

The review team, in assessing whether to document this problem as a deficiency or an advisory comment, considered several mitigating factors. KCMT intends to replace its oldest buses in the near future. The number and percentage of inaudible or partially audible announcements observed was minimal. KCMT is still refining the OBS and the system vendor, INIT, Inc., is sending an audio engineer to complete final adjustments before the end of the year. It is apparent that through KCMT's normal maintenance routine, the scheduled purchase of new buses, and the ongoing implementation of the OBS, these problems will be addressed.

The review team concludes that the volume and clarity of stop announcements is not optimum in all cases. KCMT must address the maintenance of its stop announcement equipment, including internal speakers, on a timely basis.

Prompt Repair of Accessible Features and Accommodating Riders with Disabilities

Requirement: Under 49 CFR § 37.161 (b), accessibility features shall be repaired promptly if they are damaged or out of order. When an accessibility feature is out of order, the entity shall take reasonable steps to accommodate individuals with disabilities who would otherwise use the feature. The rule does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs.

Appendix D to 49 CFR § 37.161 explains: "Repairs must be made "promptly." The rule does not, and probably could not, state a time limit for making particular repairs, given the variety of circumstances involved. However, repairing accessible features must be made a high priority. Allowing obstructions or out of order accessibility equipment to persist beyond a reasonable period of time would violate this Part, as would mechanical failures due to improper or inadequate maintenance."

Discussion: During this compliance review, no deficiencies were found with the requirements concerning timely repair of accessibility features. KCMT's implementation of the OBS is ongoing and reported problems are handled as promptly as possible. Bugs and glitches in the system continue to be resolved and the vendor, INIT, Inc., continues to support the process. A brief review of complaints, from 2013 through May 2014, related to the OBS, demonstrates a substantial reduction in problems. It should be noted that the majority of complaints about the OBS in the past year are not from people with disabilities. Passengers have complained about the volume (too loud) inside the bus and residents of neighborhoods adjacent to routes complained about external rout announcements (also too loud).

Excludes Isolated or Temporary Interruptions in Service or Access due to Maintenance or Repairs

Requirement: Under 49 CFR § 37.161 (c), the rule does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs.

The rule points out that temporary obstructions or isolated instances of mechanical failure would not be considered violations of the ADA or this rule.

Discussion: During this compliance review, no deficiencies were found during review of the transit agency's public information or observed during the site visit with respect to the

requirements concerning isolated or temporary interruptions in service or access due to maintenance or repair of accessibility features.

6.7   Service Under Contract with a Private Entity (if applicable)

Requirement: Under 49 CFR § 37.23, the transit agency must ensure that any private entity with which it has entered into a contract or other arrangement to provide service meets all the obligations of the DOT ADA regulations, including those for service provision, maintenance, and vehicle or equipment acquisition, that the transit agency would be required to meet, if it provided the service directly. The transit agency must have policies and procedures in place to monitor the performance of its contractor(s) and ensure that these requirements are met. The transit agency must not neglect monitoring or limit its monitoring to the terms and conditions of its contract or other arrangement with the private entity or entities.

Discussion: KCMT has not entered into contract with any private entity to provide fixed route bus service.

6.8   Service Provided by Another Public Entity (if applicable)

Requirement: Part 37 of title 49, Code of Federal Regulations, applies to any public entity that provides designated public transportation or intercity or commuter rail transportation. Under 49 CFR § 37.21(b), for entities receiving Federal financial assistance from the Department of Transportation, compliance with the applicable requirements of Part 37 is a condition of section 504 of the Rehabilitation Act of 1973 and of receiving financial assistance. Where a transit agency relies on another public entity to provide service on its behalf, the transit agency remains responsible for meeting the requirements of 49 CFR Part 37.

The transit agency must ensure that the service provided on its behalf meets all of the requirements that the transit agency would be required to meet, if the transit agency provided the service directly. The transit agency must have policies and procedures in place to monitor the performance of such service to ensure that these requirements are met; the transit agency is not permitted to defer to the public entity operating the service.

Discussion: KCMT has not entered into contract with any other public entity to provide fixed route bus service on its behalf.

Summary Table of Compliance Review Findings

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding deficiency/ no deficiency or advisory comment	Finding(s) of Deficiency	Response Days/Date
1	Complaint Resolution and Compliance Information	27.13(b); 121(b); 37.5	Advisory Comment	It is a best practice to ensure that accessible means of filing complaints are provided through auxiliary aids and alternative formats that provide for communication that is as effective for people with disabilities as it is for others.	September 27, 2014
2	Stop Announcements	37.167 (b)	Deficiency	KCMT does not provide all required stop announcements.	180 days
3	Orientation Announcements	37.167 (b)	Deficiency	KCMT has not programmed enough stop announcements in its OBS to meet the requirement for orientation to location.	180 days
4	Route Identification	37.167 (c)	Deficiency	KCMT fails to provide required external route identification announcements.	180 days
5	Training	37.173	Deficiency	KCMT does not provide adequate training for operators and technical staff.	90 days

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding deficiency/ no deficiency or advisory comment	Finding(s) of Deficiency	Response Days/Date
6	Maintenance of Accessible Features A. Maintain in Operative Condition B. Prompt Repair C. Excludes Isolated or Temporary Interruptions in Service or Access due to Maintenance or Repairs	37.161 (a) 37.161 (b) 37.161(c)	Advisory Comment No Deficiency No Deficiency	Some difficulty was observed with the audibility of stop announcements inside buses.	90 days
7	Service Under Contract with a Private Entity (if applicable)	37.23	N/A		

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding deficiency/ no deficiency or advisory comment	Finding(s) of Deficiency	Response Days/Date
8	Service Provided by Another Public Entity (if applicable)	37.21(b)	N/A		

Attachments

Attachment A	FTA Notification Letter
Attachment B	Site Visit Schedule
Attachment C	Customer Interview Form (Blank)
Attachment E	On-Line Complaint From & Sample from KCMT Complaint Database
Attachment G	Fixed Route Operator Interview Form (Blank)
Attachment I	On-Board Stop Announcements Assessment Form
Attachment J	Route Identification Assessment Form
Attachment L	KCMT OBS Feedback Form
Attachment M	Excerpts from KCMT Procedures
Attachment O	On-Board Stop Announcement Data
Attachment P	External Route ID Announcement Data
Attachment Q	Stop Announcements Sufficient for Orientation Data
Attachment R	Audibility of On-Board Announcements Data
Attachment S	Performance – Programmed Stops in OBS
Attachment T	Comparison and Summary of Required and Programmed Announcements

Attachment A
FTA Notification Letter to King County Metro Transit

U.S. Department   Headquarters   East Building, 5th Floor, TCR
Of Transportation   1200 New Jersey Ave., SE
Federal Transit   Washington, D.C. 20590
Administration

May 15, 2014

Kevin Desmond, General Manager Metro Transit Division
King County Metro Transit
King Street Center
KSC-TR-0415
201 South Jackson Street
Seattle, WA 98104-3856

Dear Mr. Desmond:

The Federal Transit Administration (FTA) is responsible for ensuring compliance with the Americans with Disabilities Act of 1990 (ADA) and the Department of Transportation's (DOT) implementing regulations at 49 CFR Parts 27, 37, 38, and 39 as they relate to public transportation. As part of our ongoing oversight efforts, FTA's Office of Civil Rights conducts a number of on-site compliance reviews of fixed route transit providers. The King County Metro Transit (KCMT) has been selected for such a review.

The purpose of this review will be to determine whether KCMT is meeting its obligations under the DOT ADA regulations applicable to stop announcements and means of route identifications. Section 37.167(b) requires that operators of fixed route vehicles announce stops "at least at transfer points with other fixed routes, other major intersections and destination points, and intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location." Additional stops also must be announced at the request of passengers with disabilities. Section 37.167(c) requires that "where vehicles…for more than one route serve the same stop, the entity shall provide a means by which an individual with a visual impairment or other disability can identify the proper vehicle to enter or be identified to the vehicle operator as a person seeking a ride on a particular route."

The review process includes data collection prior to the visit, an on-site review of KCMT's fixed route stop announcements, an opening conference after on-site observations have commenced, and an exit conference. The entire on-site portion of the review will be completed within 5 days. FTA has engaged the services of Meeting the Challenge, Inc. (MTC) of Colorado Springs, CO, to conduct the compliance review. Representatives of MTC and FTA will participate in the opening and exit conferences, with FTA participating by telephone. The on-site visit will take place between the date of this letter and the next 120 days, although we do not provide the actual date ahead of time because of the nature of the observation. MTC will contact you during their first day of on-site observations to schedule an opening conference at **9 a.m.** of the second day of their visit.

In order that we may properly prepare for the on-site visit, we request that you provide the information outlined in the enclosure to this letter within 21 days of the date of this letter. These materials should be forwarded to:
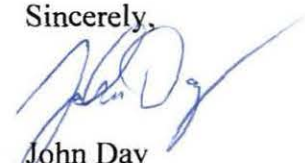
Kent Kelley
Meeting the Challenge, Inc.
3630 Sinton Road, Suite 103
Colorado Springs, CO 80907
719-444-0252, x121
kkelley@mtc-inc.com

We also request that you identify a member of KCMT staff to coordinate our activities before, during, and after the on-site review. Because review team members will spend considerable time on site during the week, please provide them with temporary identification and a workspace within or near the transit offices for the duration of their visit. The exit conference will be scheduled with short notice during the site visit, and will occur on the final day. This conference will afford an opportunity for the reviewers to discuss their observations with you and your organization. We request that you or your designee, the bus fleet service manager, the ADA coordinator, and other key staff attend the exit conference, where available. Findings will be made by the FTA Office of Civil Rights and provided to you in a written draft at a future date. You will then have an opportunity to provide comments before the report becomes final. Once transmitted to KCMT, both the draft and Final Reports will be public documents and subject to the Freedom of Information Act upon request.

We welcome your suggestions and encourage your participation as we prepare for the review. Please feel free to ask questions or provide comments on any issues you may feel relevant. If you have any questions or concerns prior to the site visit, please contact me at 202-366-1671 or by e-mail at john.day@dot.gov.

Thank you for your assistance and cooperation as we undertake this process together. We look forward to a meaningful and successful review.

Sincerely,

John Day
ADA Team Leader

Enclosure

cc: Rick Krochalis, FTA Region X Administrator
     Monica McCallum, Regional Operations Division Chief
     Christopher, MacNeith, FTA Region X Civil Rights Officer

Enclosure

<u>We request that the following information be submitted to Meeting the Challenge, Inc.</u> **within 21 calendar days from the date of this letter.**

1. Five copies of the most recent system route map.
2. Three complete sets of the current fixed route schedules.
3. A written overview of the routes operated directly by the transit agency and those operated by a private or public contractor, including copies of such contracts.
4. A description identifying the transfer points and locations where different routes serve the same stop (station) in print and electronic format, if available.
5. A written overview of the techniques and technology the transit agency uses to make stop (station) announcements and route identifications (IDs).
6. Current Fixed Route Operator Manual/s, notices, bulletins, memoranda, or other documentation informing vehicle operators of stop announcement and vehicle/passenger identification policies and procedures regarding the maintenance of the automated announcement system.
7. Materials illustrating stop announcement and route identification training for operators and supervisors, and for mechanics or technicians responsible for maintaining vehicle announcement equipment.
8. Copies of stop lists or other information the transit agency provides to vehicle operators (conductors) and/or contractors.
9. Copies of reports, memoranda, or other documentation regarding stop (station) and route (line) identification announcement monitoring activities and results.
10. A current fixed route bus fleet roster including: make, model year, number of internal speakers, number of external speakers, type of public address system, and type of automated announcement system in print and electronic format.
11. A list of complaints related to stop (station) announcements and route (line) identification filed in the past year. The list should include customer's name, contact information (telephone number and/or e-mail address), trip origin, route number, date, and nature of the complaint, carrier, and resolution (any corrective actions requested and taken).
12. A list of routes that KCMT anticipates may be terminated, truncated, or re-scheduled in the next three to six months.
13. Copies of vehicle pre-trip inspection and preventative maintenance form(s).
14. A copy of any policy pertaining to disciplinary practices for failure to make required stop announcements or vehicle identification.
15. Any records of disciplinary actions taken subsequent to complaints for failure to make ADA-required stop announcements or vehicle identification.

Attachment B
On-Site Schedule for King County Metro Transit

Reviews of ADA Stop Announcements
King County Metro Transit, King County, Washington
August 11–15, 2014
On-Site Schedule

Time	Activity	Who	Where
Monday, August 11, 2014			
All Day	Ride selected routes and record stop announcements Listen for Route IDs at transfer points	Ames/Heldt/Kelley/Gattis	On KCMT buses
Morning	Call KCMT to arrange meetings on Tuesday and Friday	Ames	
Tuesday, August 12, 2014			
10 a.m.	Opening conference with KCMT	Ames/Heldt/Kelley with FTA	KCMT Offices
Morning	Listen for Route IDs at transfer points	Gattis	At selected bus stops
1 p.m.	Interview KCMT Transit Systems Operations Manager and Technical Team	Ames	KCMT Offices
3 p.m.	Interview Accessibility Planner	Ames	KCMT Offices
Afternoon	Begin compiling data from bus and stop surveys	Heldt/Kelley	KCMT Offices
Wednesday, August 13, 2014			
All Day	Interviews with KCMT staff and drivers	Ames	KCMT Offices
All Day	Prepare data summary reports, using additional OBS stop announcement data from KCMT	Heldt/Kelley	Off-Site
Thursday, August 14, 2014			
All Day	Summarize data and begin draft report preparation	Heldt/Kelley/Ames	Off-Site

Afternoon/Evening	Forward summary of initial findings to Project Manager for QA/QC	Kelley	Off-Site
Friday, August 15, 2014			
Before exit conference	Address QA/QC comments/questions	Ames/Kelley	Off-Site
Before exit conference	Brief FTA on initial findings	Ames/Kelley	Off-Site
8:30 a.m.	Conduct exit conference	Ames/Heldt/Kelley with FTA	KCMT Offices

Attachment C
Customer Interview Form (Blank)

Agency/Customer Contact Form (Fixed Route Stop Announcements)

Agency Name:_____

Contact Person Name:_____

Contact Person Title:_____

Contact Person Phone Number:_____ Date of Contact:_____

Summarize comments regarding on-board stop announcements: _____

_____

_____

_____

Summarize comments regarding route identification: _____

_____

_____

_____

Did the person cite any documentation of issues or efforts to work with the transit agency regarding stop announcements or vehicle/passenger identification? Summarize documentation cited (and request copies are sent).

_____

_____

_____

Recommended follow-up for review team:
_____

_____

_____

_____ _____
Signature of FTA Contractor Completing this Form   Print Name

Attachment E
On-Line Complaint From & Sample from KCMT Complaint Database

Bus Rides

Use this form for questions, comments or suggestions about your ride on a Metro bus. Your feedback is important to us. Please provide as much detail as possible so staff can research your concerns, ensure your feedback is handled appropriately, and respond if requested.

* Required Fields

Your Comment

Type of comment *   Choose... ▼

Your Message *

The Ride Details

Date of the Ride *What day were you on the bus?

Time of the Day *What time were you on the bus or when did the incident occur?

Route Number *Please enter the route number you were traveling (example, enter "167" for Route 167). For RapidRide lines, enter the letters A, B, C or D.

Bus Number *This is the 3- or 4-digit number on the outside of a bus in the outer corners or inside at the right front corner, opposite the driver, is the bus number. If unknown, enter a zero.

Location *Where were you when the incident occured?

Direction of the Bus *For example, toward or away from downtown Seattle, toward or away from the Eastside or Bellevue, north, south, east or westbound. If unknown, enter X.

Your Contact Information

Name *

Email *

Phone NumberPlease include the area code. The prefix of the phone number -   The last 4 numbers of the phone number -

How do you want to be contacted? *

Choose... ▼

Send Information   Clear

Metro Customer Information
Email: customer.comments@kingcounty.gov • Phone: 206-553-3000

King County

MCS COMMENT DETAIL REPORT

Report Generated: 5/19/14 @ 12:35:14 pm

Comment # **3777231**
Created by: **40621**
Created on: **6/19/13**
Received on: **6/19/13**
Received via: **E-Mail**

CUSTOMER INFORMATION

[redacted]

Phone: (206)[redacted]

Email: contact@transitriders.org

Comment Status: **Closed**
Comment Routed on: **6/19/13**
Comment Reviewed on: **6/19/13**
Review Result:

INFORMATION FROM CAO

Red Flag?
Comment Type: **Complaint**
Primary Category: **48 - On Board System (OBS)**
2nd Category:
Tracking Category ID:
Customer Injured?
Insurance Referral:
Accident Report # :
Petition:
Used?   AVL   CSR   VAQ
Number of Attachments:

OPERATOR INFORMATION

Base:

TRIP INFORMATION

Incident Date: **6/17/13**
Route:
Parent Route/Run:
Vehicle ID:
Side of Street:
Direction of Travel:
In/Outbound:
On Street:
Cross Street:
Landmark:
Bus Stop ID:
Is Timepoint?
Scheduled Time:

CUSTOMER STATEMENT:

Letter written to Kevin Desmond by Katie Wilson, General Secretary for the Transit Rider's Union, requesting a meeting to discuss the following issues:

1. Stop announcements are unpredictable

2. Not enough stop announcements

3. Announcements are not loud enough

4. Timing is off

5. Announcement of reroutes

6. Problems with route announcements at bus stops

7. ORCA Card readers (beeps versun announcements)

Letter forwarded by GM to Brad Kittredge for response.

COMMENT ROUTING(S)

RECIPIENT	ROUTED FOR	DATE ROUTED
46231 - B. Kittredge	Information	6/19/13

COMMENT REPLY/REVIEW NOTE(S)

TYPE	DATE/TIME		FROM
REPLY	6/19/13	8:59 am	46231 - B. KITTREDGE

To: Thomas J. Randall - I received the letter yesterday from the Transit Riders Union, and prepared a response to these questions for Mr. Desmond the same day.

Attachment G
Fixed Route Operator Interview Form (Blank)

Fixed Route Driver Interview Form

Agency:

Driver Name:

Date and Place of Interview:

Reviewer:

---

1. How long have you been a bus operator?

2. When do you make on-board bus stop announcements?

3. Are you provided a list of bus stops to announce?
   - ○ Yes
   - ○ No
   - ○ Sometimes

4. What do you do if a passenger asks you to announce a stop?

5. Do you announce your route to waiting customers?
   - ○ Yes
   - ○ No
   - ○ Sometimes

   5a. If Yes, when and at what kind of stops?

   5b. What do you announce?

6. Do you drive buses that have automated stop announcement systems?
   - ○ Yes
   - ○ No
   - ○ Sometimes

   How often?

   6a. In your experience, does the automated stop announcement system typically work?
   - ☐ Yes
   - ☐ No
   - ☐ Sometimes

   6b. What do you do if the stop announcement system is not working?

7. Do you drive buses that make automated external bus route announcements?

○ Yes
○ No
○ Sometimes

How often?

[   ]

7a. In your experience, does the automated external bus route announcement system typically work?

○ Yes
○ No
○ Sometimes

7b. What do you do if the external bus route announcement system is not working?

[   ]

8. Do you use the PA system to make on-board stop announcements?

○ Yes
○ No
○ Sometimes

How often?

[   ]

8a. In your experience, does the PA system typically work?

○ Yes
○ No
○ Sometimes

8b. What do you do if the PA system is not working?

[   ]

9. Do you check at the beginning of each shift to see if the PA or enunciator equipment is working?

○ Yes
○ No
○ Sometimes

9a. If it is not working, what do you do?

[   ]

10. Do you have any problems with making on-board stop and route announcements?

[   ]

11. Do you feel that you have all the information and training that you need to make the proper on-board stop announcements?

○ Yes
○ No
○ Sometimes

Is there anything that would help you?

[   ]

Attachment I
On-Board Stop Announcements Assessment Form

Exhibit 6

<u>**On-Board Fixed Route Stop Announcements Assessment Form**</u>

Transit agency Name _____ Date:_____

Route #/Direction/Destination _____ Vehicle Number:_____

Boarded at: _____Disembarked at: _____

Time:_____AM /PM   Time: _____AM

/ PM

List stops that should be announced (transfer points, orientation, major destinations) and Source (bus schedule, system map, transit agency response to FTA, etc.) _____	Check (✓) If On Transit Agency Stop List	On-Board Announcement Made?		Method of Announcement			Audible?	
		Yes	No	Voice	PA	Auto	Yes	No

Attachment J
Route Identification Assessment Form

Exhibit 7

Route/Line Identification Assessment Form

Transit Agency Name: _____

Stop/Station Location:_____ Date:_____

**Record of External Announcements or Other Method of Route (Line) Identification:
Page _____ of _____**

1. Bus or Car #_____ Driver Name or Badge #:_____

    Time:_____ Vehicle/Run Announced? ☐ YES ☐ NO

    Announcement:"_____"

2. Bus or Car #_____ Driver Name or Badge #:_____

    Time:_____ Vehicle/Run Announced? ☐ YES ☐ NO

    Announcement:"_____"

3. Bus or Car #_____ Driver Name or Badge #:_____

    Time:_____ Vehicle/Run Announced? ☐ YES ☐ NO

    Announcement:"_____"

4. Bus or Car #_____ Driver Name or Badge #:_____

    Time:_____ Vehicle/Run Announced? ☐ YES ☐ NO

    Announcement:"_____"

5. Bus or Car #_____ Driver Name or Badge #:_____

    Time:_____ Vehicle/Run Announced? ☐ YES ☐ NO

    Announcement:"_____"

6. Bus or Car #_____ Driver Name or Badge #:_____
    Time:_____ Vehicle/Run Announced? ☐ YES ☐ NO
    Announcement:"_____"

Notes Regarding Other Observations (lift/securement use, assistance provided, etc.):_____
_____
_____

Signature and Name of FTA Contractor:

_____

Attachment L
KCMT OBS Feedback Form

King County

Atlantic Base OBS Feedback Form

Operator Name: _____   ID#: _____

Date: _____

Route/Run #: _____   Coach #: _____   Base: _____

Please return this form to the Window for the base chiefs. Thank You!

Please report the following types of problems on this form:

- Radio
- DDU
- ORCA
- Schedule or Headway Issues
- Instructions from Coordinator

- Next stop Announcements and Displays
- Exterior route and destination announcements
- Destination sign changes
- Road-side equipment (ORCA Card Readers and Real Time Information Signs)

Please document each problem you observe.

| Time: |
| Route: |
| Direction: |
| Location: |
| What Went Wrong? |
| What was happening before the problem occurred? |

| Time: |
| Route: |
| Direction: |
| Location: |
| What Went Wrong? |
| What was happening before the problem occurred? |

Revised: 11-10-11

Time:

Route:

Direction:

Location:

What Went Wrong?

What was happening before the problem occurred?

Time:

Route:

Direction:

Location:

What Went Wrong?

What was happening before the problem occurred?

Time:

Route:

Direction:

Location:

What Went Wrong?

What was happening before the problem occurred?

Time:

Route:

Direction:

Location:

What Went Wrong?

What was happening before the problem occurred?

Attachment M
Excerpts from KCMT Procedures

Operator Service and Facilities Report

When completed, please turn in to the Base Window

King County METRO

Operator
(First/Last Name) _____ I.D.# _____ Date _____

☐ Regular Operator
☐ Board/Vacation Relief Operator

Contact Phone or Email _____

Route # _____ Run # _____ Coach # _____ Base _____ Response Requested ☐ Yes ☐ No

---

For Office Use Only

Routing for
Base Chief Certification: Base Chief Name: _____ Phone #: _____ Date Forwarded: ____ / ____ / ____

☐ Item A – To: KSC-TR-0413, Route Facilities > **ENTER Zone #** _____ *http://servdev/other/busstops/busstops.cfm*
☐ Item B – To: KSC-TR-0828, Work Center
☐ Item C – To: KSC-TR-0894, Information Production   ☐ Item E – To: KSC-TR-0422, Service Planning
☐ Item D – To: KSC-TR-0424, Scheduling   ☐ Item F – To: TCC-TR-0422, ORCA – ADMIN
Comments:

Do not submit this form if you reported this problem via the Metro **Work Center / Graffiti** Hotline 206-263-6369.

A Bus Zone Related Problems

1) Record the exact location (*required)

*City _____ Direction of Travel: ☐ NB ☐ SB ☐ EB ☐ WB

*On Street _____

*Nearest Cross Street _____

*Signed Route # _____

Please label the map to the right with streets names and use the following symbols to show where the problem is.

🌳 For tree/bushes that need trimming   ⚑ Zone location

⊕ For lights that are out

(Map with N, S, E, W directions)
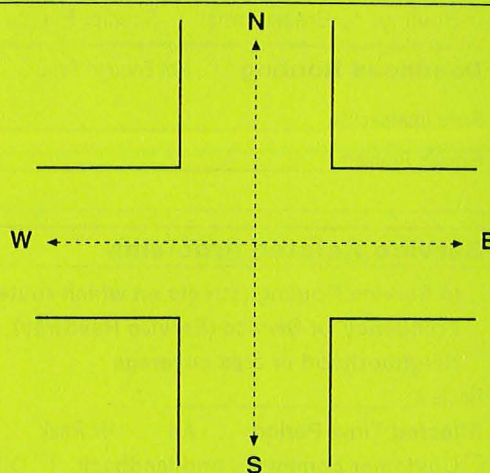
2) Action(s) Requested

Bus Zone:	☐ Move	☐ Remove	☐ Re-install	☐ New Bus Zone Requested
Bus Sign:	☐ Down	☐ Missing	**Route Number On Sign:** ☐ Remove·Route # _____	☐ Add Route # _____
Bus Sign Post:	☐ Down	☐ Missing	☐ Leaning	
Sign Stickers:	☐ Missing Accessibility	☐ Incorrect Type of Sticker	☐ Missing Ride Free Area	☐ Other _____
Curb Paint Needed:	☐ Bus Stop	☐ Layover		
Graffiti:	☐ Sign	☐ Shelter	☐ Mural	
Lighting Needed:	☐ Yes	☐ Other _____		

Streetlight or Bus Zone Light Out: Pole # _____ (helps to get light repaired faster)

Tree/Bushes: ☐ Needs Trimming   ☐ Needs Removal   ☐ Other _____

ADA Improvements Needed: ☐ Passenger Loading Area   ☐ Walkway/Sidewalk Improvements Needed   ☐ Other _____

B Bus Shelter Related Problems

Location (Required): *Please complete Section A1* (record the exact location **and** label the map)
☐ Sign ☐ Sign ☐ Sign ☐ Other
Maintenance Problems: ☐ Litter ☐ Shelter Window Broken ☐ Damaged Shelter ☐ Other _____ Shelter # _____

Explain Problem: _____

C Customer Information Related Problems

Location (Required): *Please complete Section A1* (record the exact location **and** label the map)

Schedule Holder/Schedule:	☐ Down or Missing	☐ Glass Broken	☐ Schedule Incorrect*	☐ Schedule missing
Information Sign/Kiosk:	☐ Down or Missing	☐ Glass Broken	☐ Schedule Incorrect*	☐ Schedule missing

Highlight error and attach copy of timetable

Explain Problem: _____

D | Scheduling Related Problems

Schedulers make regular Base visits, watch for notices posted at your Base.

Overload   **Definition:**   When customers are standing more than 20 minutes **and** *Standard coach*: at least 9 standing,
Artic coach: at least 14 standing, *Vans*: at least 4 standing.

Route Number Operated at Time of Overload: _____   ☐ Inbound   ☐ Outbound   ☐ Shuttle

Number of Passengers Standing: _____   Time Occurred **From:** ___:___ ☐ a.m./ ☐ p.m. **Until:** ___:___ ☐ a.m./ ☐ p.m.

Overload is Consistent on: ☐ M   ☐ T   ☐ W   ☐ Th   ☐ F **or** ☐ All weekdays   ☐ Sat   ☐ Sun

Are Passengers Being Passed Due to Overload?   ☐ Yes   ☐ No   **Type of Coach** _____

Intersection Where the Overload Started _____

Intersection Where the Overload Cleared _____

Trip Operated: ☐ On-time ☐ Early ☐ Late   **Coordinator Contacted** ☐ Yes ☐ No Time Contacted: ___:___ ☐ a.m./ ☐ p.m.

Schedule Running Times *Please report problems that cause the trip(s) to operate early or late*

☐ Early   ☐ Late > *Mark a run card with actual arrival times at each timepoint for trip(s) that need to be changed. Attach it to this report.*
Late operation results in missed transfer at _____

Occurs Consistently Due to: ☐ Traffic light   ☐ Business On-Route   ☐ Difficult Turn   ☐ Bus Zone(s)   ☐ Schedule
☐ Routing   ☐ Breakdowns   ☐ Special Events   ☐ Construction   ☐ Lift Use   ☐ Overloads   ☐ Other_____

Deadhead Routing ☐ Not Enough Time   ☐ Too Much Time   ☐ Poor Routing   ☐ Other

From Intersection _____ to _____ Intersection

Explain Problem: _____
_____

E | Service Related Problems

☐ In Service Routing (streets on which route operates in revenue service)   ☐ New Route(s)
☐ Frequency Of Service (Service Headway)   ☐ Route Extension(s)
☐ Neighborhood or area coverage
Route # _____

Affected Time Period: ☐ All   ☐ AM Peak   ☐ Midday   ☐ PM Peak   ☐ Evening or Night   ☐ Saturday   ☐ Sunday
☐ Customer comments and feedback   ☐ Other (useful for service planners to hear)

Explain Problem: _____
_____

F | ORCA Related Problems

Login Problems:_____
Incorrect Trip Data
Trip Start Time different from Run Card   **Note which trip:** _____
Trip Missing / Extra Trip (check one) at ___:___ ☐ a.m./ ☐ p.m.   Trip information_____
First fare default is incorrect at ___:___ ☐ a.m./ ☐ p.m. Fare is: _____   Should be: _____
Wrong fare set / unable to set correct fares at ___:___ ☐ a.m./ ☐ p.m. Explain: _____
Comments:_____
_____

Section Response to Problems   (For Office Use Only)

☐ Item A – Route Facilities_____

☐ Item B – Work Center _____

☐ Item C – Information Production _____

☐ Item D – Scheduling _____

☐ Item E – Service Planning_____

☐ Item F – ORCA _____

Name: _____   Section: _____   Date: _____ / _____ / 20 ____

Metro
Ride Check Report

King County

Ride Check Type:

Base:	Chief:	Date:
Operator:	Badge:
Route No:	Run No:	On Route:	Coach:
From:		To:
Time:	☐ AM ☐ PM	Time:	☐ AM ☐ PM

Re-instructed:

Pass: ☐   **Follow Up Required:** ☐

Remarks:

Signature: **ID:**

Date: **Grading Choices:**

TOQS: ☐

Grading Choices:
E = Excellent
S = Satisfactory
R = Re-instructed
U = Unsatisfactory
/ = Not Observed

A. Driving Skills

1		**Starting/Rollback**
2		**Stopping**
	a	Smooth Application
	b	Full Stop
	c	Before Stop Bar
	d	Spacing
3		**Lane change**
4		**Lanes**
	a	Clearance
	b	Steering
	c	Lane Position
5		**Turn Signals**
6		**Speed**
7		**Following Distance**
8		**Reading Road, Def. Drive**
9		**Passing**
10		**Intersections**
11		**Bus Zones / Bays**
	a	Mirrors
	b	Clearance
	c	Speed In/Out
	d	Position
	e	Doors
12		**Railroad Crossing**
13		**Safety Stops**

14		**Mirrors**
	a	Frequency
	b	Pedestrians
	c	Traffic
15		**Steering**
16		**Right turns**
	a	Speed
	b	Mirrors
	c	Signal/4-way flashers
	d	Traffic
	e	Pedestrian
	f	Set Up, Execution
17		**Left turns**
	a	Speed
	b	Mirrors
	c	Signal/4-way flashers
	d	Traffic
	e	Pedestrian
	f	Set Up, Execution
18		**Schedule**
19		**Trolley procedures**
	a	Overhead Speed
	b	Hill-Holder, Rollback
20		**Tunnel procedure**
	a	Signal Compliance

B. Non-driving Duties

21	Route Knowledge
22	Signage
23	Seat and Mirrors Adjust
24	Safety Belts
25	Fares - Transfers
26	ORCA

27	**OBS/DDU**
28	Fare Box
29	Lift/Ramp Procedures
30	Kneeling
31	Mobility Device Secure
32	Terminal Procedures

C. Professionalism

33		**Customer Service**
	a	Courtesy
	b	Giving Information
	c	**Stops Called per ADA**
	d	Assisting Special Needs

| 34 | **Uniform** |
| 35 | **Appearance** |

Attachment O
On-Board Stop Announcement Data

King County Metro Transit
On-Board Stop Announcement Performance

Stop Type	Number of Stops	OBA Yes	%	OBA No	OBA Auto	Audible Yes	Audible Partial	Audible No	OBA PA	Audible Yes	Audible Partial	Audible No	OBA Voice	Audible Yes	Audible Partial	Audible No
Transfer	497	209	42.1%	288	204	186	13	5	1	1			4	4		
Major Destination	88	72	81.8%	16	71	70	1						1	1		
Major Intersection	116	46	39.7%	70	45	43	1	1					1	1		
Other	47	47	100.0%	0	46	41	5									
N/A	184	0	0.0%	184	0	0			1	1						
TOTALS	932	374	40.1%	558	366	340	20	6	2	2			6	6		

Attachment P
External Route ID Announcement Data

Team Member	Route	Bus #	Stop Location	Date	Time	Stop serves > 1 route	Route ID Announced?	Volume Too Soft	Volume Too Loud	Volume Good
BG	106 Barton	6829	Intl Dist/Chinatown Bay C [623]	8/12/14	10:30:00 AM	Yes	No			
GA	106 Renton	6938	Georgetown: 13th Ave S & S Bailey St	8/11/14	1:21:00 PM	Yes	No			
GA	120 Burien TC	2694	SW Barton St & 25th Ave SW Bay 3	8/11/14	8:48:00 AM	Yes	No			
GA	124 Tukwila Link	6825	3rd Ave & Pike St	8/11/14	12:50:00 PM	Yes	No			
GA	128 Admiral	7162	Southcenter Mall: Andover Park W & Baker Blvd	8/11/14	3:24:00 PM	Yes	No			
KH	13 Seattle Pacific	4164	1st Ave N & Mercer St	8/11/14	2:46:00 PM	Yes	No			
BG	131 Downtown	2886	Burien Transit Center BAY 4:	8/11/14	3:45:00 PM	Yes	No			
GA	131 Downtown	2401	Burien Transit Center BAY 4:	8/11/14	4:06:00 PM	Yes	No			
GA	132 Downtown	6920	Burien Transit Center BAY 4	8/11/14	9:15:00 AM	Yes	No			
KK	245 Crossroads/Factoria	3495	Kirkland Transit Center BAY 4	8/11/14	1:45:00 PM	Yes	No			
KK	255 Kirkland	6992	University Street Station Bay B	8/11/14	1:04:00 PM	Yes	No			
BG	255 Kirkland TC	6887	Intl Dist/Chinatown Bay B [622]	8/12/14	10:30:00 AM	Yes	No			
KK	271 University	3392	Bellevue Transit Center BAY 8	8/11/14	2:40:00 PM	Yes	No			
KH	32 University	3610	W Nickerson St & 3rd Ave W	8/11/14	3:20:00 PM	Yes	No			
KH	331 Aurora Village	1168	Shoreline Community College	8/11/14	12:57:00 PM	Yes	No			
BG	345 Northgate	1168	Shoreline Community College	8/11/14	9:57:00 AM	Yes	No			
KH	345 Shoreline CC	1142	N 130th St & Meridian Ave N	8/11/14	12:10:00 PM	Yes	No			
KH	346 Aurora Village	3619	Northgate Transit Center BAY 3	8/11/14	11:31:00 AM	Yes	No			
GA	36 Othello Station	4251	Beacon Hill Station: Beacon Ave S & S Lander St	8/11/14	10:48:00 AM	Yes	No			
BG	36 Othello Station	4190	Beacon Ave S & S Lander St	8/11/14	1:57:00 PM	Yes	No			
BG	36 Othello Station	4214	S Jackson & 5th Ave S	8/12/14	10:00:00 AM	Yes	No			
KH	40 Northgate	2629	NW Market St & Ballard Ave NW	8/11/14	10:56:00 AM	Yes	No			
BG	40 Northgate	3514	NW Market St & Ballard Ave NW	8/11/14	9:12:00 AM	Yes	No			
BG	41 Lake City	2732	Northgate Transit Center - Bay 2	8/11/14	10:47:00 AM	Yes	No			
KK	43 Downtown	4292	E John St & 15th Ave E	8/11/14	3:45:00 PM	Yes	No			
KK	43 University	4242	Pike St & 4th Ave	8/11/14	8:09:00 AM	Yes	No			
KH	44 Ballard	4203	15th Ave NE & NE Campus Pkwy	8/11/14	10:23:00 AM	Yes	No			
KH	48 Loyal Heights	6941	Aurora Ave N & N 85th St	8/11/14	1:59:00 PM	Yes	No			
BG	49 Downtown	4237	NE 45th St & University Way NE	8/11/14	1:03:00 PM	Yes	No			
KK	49 University	4242	Broadway E & E John St	8/11/14	9:50:00 AM	Yes	No			
BG	5 Shoreline CC	2737	3rd Ave & Pine St	8/11/14	8:30:00 AM	Yes	No			
BG	5 Shoreline CC	2764	Greenwood Ave N & N 103rd St	8/11/14	9:43:00 AM	Yes	No			
BG	550 Bellevue	?	Intl Dist/Chinatown Bay D [624]	8/12/14	10:30:00 AM	Yes	No			
BG	550 Bellevue	9603	Intl Dist/Chinatown Bay D [624]	8/12/14	10:30:00 AM	Yes	No			
BG	60 Westwood Village	7012	Broadway & E Pine St	8/11/14	1:31:00 PM	Yes	No			
KH	65 University	2744	NE 125th St & 35th Ave NE	8/11/14	9:31:00 AM	Yes	No			
BG	65 University	3692	30th Ave NE & NE 130th St	8/11/14	11:16:00 AM	Yes	No			
GA	7 Downtown	2615	Mt Baker TC BAY 1: Rainier Ave S & S Forest St	8/11/14	11:30:00 AM	Yes	No			
BG	7 Ranier	4208	S Jackson & 5th Ave S	8/12/14	10:00:00 AM	Yes	No			
BG	7 Ranier	4220	S Jackson & 5th Ave S	8/12/14	10:00:00 AM	Yes	No			
KK	70 Downtown	4152	15th Ave NE & NE Campus Pkwy	8/11/14	3:03:00 PM	Yes	No			
BG	70 Downtown	4192	S Main St & 3rd Ave S	8/12/14	10:15:00 AM	Yes	No			
BG	71 Downtown	2696	NE 65th St & 35th Ave NE	8/11/14	11:57:00 AM	Yes	No			
KH	75 Lake City/Northgate	2692	NE Campus Pkwy & Univ Way NE	8/11/14	8:45:00 AM	Yes	No			
KK	8 Seattle Center	2876	Rainier Ave S & Mt Baker TC BAY 1	8/11/14	9:20:00 AM	Yes	No			
KK	8 Seattle Center	6932	E John St & 23rd Ave E	8/11/14	11:29:00 AM	Yes	No			
BG	99 Pioneer Square	3639	S Jackson & 5th Ave S	8/12/14	10:00:00 AM	Yes	No			
BG	99 Pioneer Square	3039	S Jackson & 5th Ave S	8/12/14	10:00:00 AM	Yes	No			
KK	B Bellevue	6035	156th Ave NE & Overlake TC BAY 7	8/11/14	2:06:00 PM	Yes	No			
GA	C West Seattle	6110	3rd Avenue & Pike	8/11/14	8:07:00 AM	Yes	No			
KH	D Downtown	6047	15th Ave NW & NW 85th St	8/11/14	2:19:00 PM	Yes	No			
KH	E Downtown	6085	Aurora Village Transit Ctr Bay 10	8/11/14	1:12:00 PM	Yes	No			
GA	F Burien	6103	Renton TC Bay 3: Transit Center Roadway & Burnett Ave S	8/11/14	2:38:00 PM	Yes	No			
GA	F Burien	6000	Tukwila Intl Blvd Station BAY 3	8/11/14	3:49:00 PM	Yes	No			
BG	14 Mt Baker	4154	S Jackson & 5th Ave S	8/12/14	10:00:00 AM	Yes	Yes			Yes
BG	150 Kent	6950	Intl Dist/Chinatown Bay C [623]	8/12/14	10:30:00 AM	Yes	Yes			Yes
BG	36 Othello Station	4134	S Jackson & 5th Ave S	8/12/14	10:00:00 AM	Yes	Yes	Yes		
BG	36 Othello Station	4144	S Jackson & 5th Ave S	8/12/14	10:00:00 AM	Yes	Yes	Yes		
BG	36 Othello Station	4130	S Jackson & 5th Ave S	8/12/14	10:00:00 AM	Yes	Yes	Yes		
BG	7 Ranier	4244	S Jackson & 5th Ave S	8/12/14	10:00:00 AM	Yes	Yes	Yes		

Attachment Q
Stop Announcements Sufficient for Orientation Data

37.167(b)(1) "... intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location."

Route Number	Bus Number	Segment — From	Segment — To	Total Number of Stops Observed	Number of Stops OBA	Percent of Stops OBA	Max Number Consecutive Stops w/o OBA
106 - Renton	6938	S Albro Pl & Stanley Ave S	S Henderson St & Martin L King Jr Way S	18	6	33%	5
107 - Renton TC	1173	Renton Ave S & S Henderson St	Transit Center Roadway & Burnett Ave S Bay 2	43	11	26%	12
120 - Burien TC	2694	SW Roxbury St & 26th Ave SW	Burien Transit Center BAY 5	20	8	40%	3
124 - Tukwila Link Station	6825	3rd Ave & Seneca St	13th Ave S & S Bailey St	19	7	37%	7
128 - Admiral District	7162	Andover E & Strander Blvd	Tukwila Intl Blvd Sta BAY 3	13	4	31%	5
13 - Seattle Pacific	4164	Queen Anne Ave N & Aloha St	W Nickerson St & 3rd Ave W	12	3	25%	6
131 - Downtown Seattle	2401	1st Ave S & S 146th St	4th Ave S & S Royal Brougham Way	44	9	20%	9
132 - Downtown Seattle	6920	1st Ave S & S 146th St	8th Ave S & S Cloverdale St	36	8	22%	8
245 - Crossroads/Factoria	3495	6th St S & Kirkland Way	156th Ave NE & Overlake TC BAY 7	29	7	24%	8
255 - Kirkland	6992	Westlake Station Bay B	Kirkland Transit Center BAY 2	20	9	45%	4
271 - University District	3392	NE 8th St & 108th Ave NE	15th Ave NE & NE Campus Pkwy	15	7	47%	7
32 - University District	3610	W Nickerson St & Queen Anne Ave N	NE Campus Pkwy & Univ Way NE	16	1	6%	12
331 - Aurora Village	1168	Greenwood Ave N & N Greenwood Dr	Aurora Village Transit Center	21	5	24%	6
345 - Seg 1 - Northgate	1168	N Innis Arden Way & Greenwood Ave N	Northgate Transit Center Bay 4	32	11	34%	7
345 - Seg 2 - Shoreline C C	1142	N 130th St & Ashworth Ave N	Shoreline Community College	16	4	25%	7
346 - Aurora Village	3619	1st Ave NE & NE 95th St	Meridian Ave N & N 130th St	14	5	36%	6
36 - Seg 1 - Othello Station	4190	Beacon Ave S & S Stevens St	Beacon Ave S & S Columbian Way	7	3	43%	3
36 - Seg 2 - Othello Station	4251	Beacon Ave S & S Stevens St	S Myrtle St & 39th Ave S	18	4	22%	9
40 - Seg 1 - Northgate	3514	24th Ave NW & NW 57th St	Holman Rd N & Greenwood Ave N	17	0	0%	17
40 - Seg 2 - Northgate	2629	24th Ave NW & NW 57th St	Northgate Transit Center	27	9	33%	4
41 - Lake City	2732	5th Ave NE & NE 103rd St	Lake City Way NE & NE 130th St	13	6	46%	4
43 - Seg 1 - University District	4242	Pike St & Convention Pl	23rd Ave E & E John St	11	9	82%	1
43 - Seg 2 - Downtown Seattle	4213	NE 45th St & University Way NE	E John St & 23rd Ave E	18	9	50%	6
43 - Seg 3 - Downtown Seattle	4292	E John St & 12th Ave E	Pine St & 5th Ave	7	7	100%	0
44 - Seg 1 - Ballard	4258	NW Market St & NW 48th St	NW Market St & Ballard Ave NW	9	4	44%	4
44 - Seg 2 - Ballard	4203	15th Ave NE & NE 42nd St	NW Market St & 15th Ave NW	21	15	71%	4
48 - Seg 1 - Loyal Heights	6941	N 85th St & Fremont Ave N	NW 85th St & 15th Ave NW	7	3	43%	2
48 - Seg 2 - Mt. Baker TC	6395	23rd Ave E & E Madison St	Rainier Ave S & S Forest St BAY 2	15	9	60%	5
49 - Seg 1 - Downtown Seattle	4237	15th Ave NE & NE 43rd St	Broadway & E Pine St	16	5	31%	9
49 - Seg 2 - University District	4242	Broadway E & E Harrison St	11th Ave NE & NE 45th St	13	7	54%	4
5 - Seg 1 - Shoreline CC	2737	3rd Ave & Virginia St	Phinney Ave N & N 46th St	15	10	67%	3
5 - Seg 2 - Shoreline CC	2764	Greenwood Ave N & N 107th St	Shoreline Community College	17	4	24%	6
50 - West Seattle/SODO, Alki	1100	S Columbian Way & S Angeline St	Delridge Way SW & SW Genesee St	12	5	42%	5
50 - Seg 1 - Westwood Village	7012	Broadway & E Pike St	Beacon Ave S & S Lander St	19	11	58%	4
60 - Seg 2 - Broadway	3602	S Cloverdale St & 12th Ave S	Beacon Ave S & S Lander St	21	8	38%	4
60 - Seg 1 - University District	3692	30th Ave NE & NE 127th St	35th Ave NE & NE 65th St	20	7	35%	5
65 - Seg 1 - University District	2744	35th Ave NE & NE 34th Ave NE	Grant Ln & Stevens Way	28	13	46%	5
7 - Downtown Seattle	2615	Rainier Ave S & S Bayview St	3rd Ave & Pike St	17	12	71%	2
70 - Seg 1 - University District	4177	3rd Ave & Columbia St	NE Campus Pkwy & Univ Way NE	18	10	56%	4
70 - Seg 2 - Downtown Seattle	4152	NE Campus Pkwy & 12th Ave NE BAY 4	3rd Ave & Union St	19	10	53%	3
71 - Downtown Seattle	2696	NE 65th St & 32nd Ave NE	University Way NE & NE 45th St	13	4	31%	4
75 - Lake City/Northgate	2692	Grant Ln & George Wash Ln	NE 125th St & 35th Ave NE	32	11	34%	6
8 - Seg 1 - Seattle Center	2876	Martin L King Jr Way S & S Mcclellan St	E Olive Way & Broadway E	24	13	54%	4
8 - Seg 2 - Seattle Center	6943	Martin L King Jr Way S & S Holly St	Rainier Ave S & S Forest St BAY1	13	5	38%	5
8 - Seg 3 - Seattle Center	6932	E Thomas St & 19th Ave E	Denny Way & Broad St	14	10	71%	5
Rapid Ride B - Bellevue	6035	NE 31st St & 156th Ave NE	Bellevue Transit Center BAY 3	13	8	62%	1
Rapid Ride C - West Seattle	6110	3rd Ave & Seneca St	SW Barton St & 26th Ave SW BAY 1	16	10	63%	3
Rapid Ride D - Downtown Seattle	6047	15th Ave NW & NW 80th St	Queen Anne Ave N & W Mercer St	16	9	56%	5
Rapid Ride E - Downtown Seattle	6085	Aurora Ave N & N 200th St	Aurora Ave N & N 85th St	20	11	55%	3
Rapid Ride F - Seg 1 - Burien TC	6103	S 2nd St & Shattuck Ave S	Strander Blvd & Andover Park E	10	4	40%	2
Rapid Ride F - Seg 2 - Burien TC	6000	S 154th St & 32nd Ave S	Burien Transit Center BAY 4	8	4	50%	2
				932	374	40%	

Attachment R
Audibility of On-Board Announcements Data

Route #	Bus #	Number Of Inaudible or Partially Audible Announcements
120 Burien	2694	1
131 Downtown	2401	5
255 Kirkland	6992	2
32 University	3610	1
345 Shoreline CC	1142	1
36 Othello	4190	2
36 Othello	4251	2
44 Ballard	4258	3
49 Downtown	4237	3
49 University	4242	3
65 University	3692	4
75 Lake City	2692	1
Total		28

Attachment S
Performance – Programmed Stops in OBS

King County Metro Transit
Performance - Stops Programmed in OBS

Stop Type	Number of Stops	OBA Yes	%	OBA No	OBA Auto	Audible Yes	Audible Partial	Audible No	OBA PA	Audible Yes	Audible Partial	Audible No	OBA Voice	Audible Yes	Audible Partial	Audible No
Transfer	222	194	87.4%	28	191	174	13	4					3	3		
Major Destination	71	68	95.8%	3	67	66	1						1	1		
Major Intersection	43	41	95.3%	2	40	39	1						1	1		
Other	52	42	80.8%		25	37	5									
TOTALS	388	345	88.9%	43	340	316	20	4					5	5		

Attachment T
Comparison and Summary of Required and Programmed Announcements

King County Metro Transit
Comparison and Summary of Required and Programmed Announcements

Stop Type	Number of Stops	Number Programmed in OBS	% of Total Programmed in OBS	OBA Total	OBA % of Total	OBA for Programmed Stops	OBA % of Programmed Stops
Transfer	497	222	44.7%	209	42.1%	194	87.4%
Major Destination	88	71	80.7%	72	81.8%	68	95.8%
Major Intersection	116	43	37.1%	46	39.7%	41	95.3%
Subtotals	701	336	47.9%	327	46.6%	303	90.2%
Other	47	52	110.6%	47	100.0%	42	80.8%
N/A	184	544	N/A	0	0.0%	0	0.0%
TOTALS	932	932	51.9%	374	40.1%	345	37.0%