

# **Los Angeles Department of Transportation (LADOT)**

**Los Angeles, California**

**April 19–23, 2010**

*Summary of Observations*

## **Review of Route Identification and Stop Announcements**

**Prepared for**

**Federal Transit Administration**

**Office of Civil Rights**

**Washington, DC**

**Prepared by**

**Planners Collaborative, Inc.**

**with**

**TranSystems Corporation**

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# 1 Introduction

## 1.1 Purpose and Overview

The Federal Transit Administration (FTA) is responsible for ensuring compliance with the Americans with Disabilities Act of 1990 (ADA) and the U.S. Department of Transportation (DOT) regulations (49 CFR Parts 27, 37, 38, and 39) that implement this civil rights law. Section 37.167 of the DOT ADA regulations requires transit systems to 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 disabilities to be oriented to their location. In addition, transit systems are required to announce any stop upon the request of an individual with a disability. In cases where a bus stop or rail station serves more than one route, transit systems are required to provide an effective means for a person with a visual impairment or other disability to identify the proper vehicle they wish to board.

As part of its oversight efforts, FTA, through its Office of Civil Rights, conducts periodic reviews of fixed route transit services operated by grantees. In a letter dated January 22, 2010, FTA notified the Los Angeles Department of Transportation (LADOT) 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.

Planners Collaborative, Inc., and TranSystems Corporation, both located in Boston, MA conducted the review. Jim Purdy served as the review team leader. Other reviewers were John Hersey of Planners Collaborative and Tom Procopio of TranSystems.

The stop announcement and route identification field work began on Monday, April 19, 2010, and continued on April 20 and April 21, with all three reviewers making observations. Members of the FTA Los Angeles Metropolitan Office made additional observations. Following the standard methodology for stop announcement reviews, FTA informed LADOT that the review team was on site, and on Wednesday, April 21, the opening conference took place at LADOT's offices. Attendees included:

Corinne Ralph	LADOT Head of Transit Operations
Yanna Loewy	LADOT Section Head – DASH Section
Jeffrey Anderson	LADOT Project Manager, DASH Packages 5A and 5B
Jacob Brothers	LADOT Project Manager, DASH Package 1
Mary Gligorov	LADOT Project Manager, Commuter Express Region 1
Raphael Gomez	LADOT Project Manager, Commuter Express Region 2
Michael Pasqual	LADOT Project Manager, DASH Package 2
Cheryl Rogers	First Transit General Manager, Commuter Express (Region 1)
Mike Royle	First Transit Maintenance Manager, Commuter Express (Region 1)
Robert Mendoza	MV Transportation General Manager, Commuter Express (Region 2)
Arcy Torres	MV Transportation General Manager, DASH Package 4
Jose Villaseñor	MV Transportation General Manager, DASH Package 5B
Duane Eskiarta	Veolia Transportation Regional Manager
Michael Keith	Veolia Transportation General Manager, DASH Package 3

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Ralph Power	Veolia Transportation General Manager, Downtown DASH
Steve Rodriguez	Veolia Transportation General Manager, DASH Packages 1 & 2
Tina Trisby	Veolia Transportation General Manager, DASH Package 5A
Ray Tellis	FTA Los Angeles Metropolitan Office
Jonathan Klein	FTA Los Angeles Metropolitan Office
Derrin Jourdan	FTA Region IX Civil Rights Officer (by phone)
Susan Clark	FTA Office of Civil Rights (by phone)
Jim Purdy	Planners Collaborative, Team Leader
John Hersey	Planners Collaborative
Tom Procopio	TranSystems

Mr. Tellis of the FTA Los Angeles Metropolitan Office introduced Susan Clark of the FTA Office of Civil Rights, who participated via telephone. Ms. Clark began her remarks by thanking LADOT for its assistance with the review and stated that the review team had been on site since Monday, April 19. She explained that reviews of on-board announcements were conducted by providing a general timeframe for the review, having the review team make initial observations, and then notifying the transit system and requesting an opening conference. This process ensures that the field observations of stop and route announcements are not influenced by the grantee knowing when the review team is on site.

Ms. Clark stated that the main purpose of the review is to assess compliance with ADA requirements. She also mentioned that the review team had significant experience with ADA fixed route operations and encouraged LADOT to use the review team for technical assistance. She said that preliminary findings and an opportunity to respond would be provided at the closing meeting on Friday April 23, 2010. She encouraged LADOT to ask questions about the preliminary findings and about possible approaches for addressing any issues that might be identified.

Mr. Purdy summarized the activities of the review team from the previous two days, which consisted of field observations of stop and route announcements on LADOT bus routes. Activities also included waiting at stops served by multiple bus routes and observing route identification performance patterns. Mr. Purdy then presented a proposed schedule of meetings with LADOT and contractors for Wednesday and Thursday. Attachment B is a copy of the on-site review schedule.

During the remainder of the day, the review team met with various LADOT senior staff, including Chief of Transit James Lefton, who was unable to attend the opening conference. The review team gathered information about policies and procedures for stop and route announcements. These discussions included LADOT procedures for regular meetings with contractors and for monitoring their compliance with ADA. On Wednesday afternoon and Thursday, the review team interviewed general managers (GMs) and supervisory staff at four of LADOT's contractor sites regarding maintenance of public address (PA) systems, driver training, driver performance monitoring, and driver discipline. The review team also conducted interviews with drivers at three of the contractor facilities.

On Friday April 23, 2010, the review team finished compiling the data from their field observations and prepared preliminary findings for presentation at the exit conference that afternoon. Those present at the exit conference were:

Corinne Ralph	LADOT Head of Transit Operations
Kari Derderian	LADOT Section-Head Commuter Express Program
Jeffrey Anderson	LADOT Project Manager, DASH Packages 5A and 5B
Michael Pasqual	LADOT Project Manager, DASH Package 2
Myron Broadnax	MV Transportation Operations Manager, DASH Package 4
Arcy Torres	MV Transportation General Manager, DASH Package 4
Michael Keith	Veolia Transportation General Manager, DASH Package 3
Ralph Power	Veolia Transportation General Manager, Downtown DASH
Steve Rodriguez	Veolia Transportation General Manager, DASH Packages 1 & 2
Ray Tellis	FTA Los Angeles Metropolitan Office
Jonathan Klein	FTA Los Angeles Metropolitan Office
Susan Clark	FTA Office of Civil Rights (by phone)
Jim Purdy	Planners Collaborative
John Hersey	Planners Collaborative
Tom Procopio	TranSystems

Ms. Clark began the exit conference by thanking LADOT staff members for their cooperation and assistance with the review. She indicated that a draft report would be prepared and forwarded to LADOT for review and comment. Ms. Clark stated that once the draft was transmitted to LADOT, it would be subject to release in response to Freedom of Information Act (FOIA) requests. LADOT's comments on the draft would then be incorporated into a final report, and the final report would be posted on FTA's website. Ms. Clark advised LADOT that it will be required to respond to the findings but is not required to follow the recommendations presented in the draft report. Recommendations are offered as suggestions for addressing the findings, and LADOT may consider the recommendations in developing responses to the findings.

The review team then presented the preliminary findings from the on-site review.

## 1.2 Organization of the Report

Chapter 2 summarizes the review team's findings. Chapter 3 describes efforts by LADOT and its contractors to comply with the regulations, including written policies and procedures, driver training, and compliance-monitoring efforts. Chapter 4 presents the review team's observations, analysis, and findings related to on-board stop announcement performance. Chapter 5 presents observations, analysis, and findings regarding route identification performance.

A copy of LADOT's response to the draft report is included as Attachment C (for Final Report).

## 1.3 Overview of LADOT Transit Services

LADOT operates local fixed route bus services known as DASH as well as fixed route commuter services known as Commuter Express. Among county transit operators, LADOT is second to the Los Angeles County Metropolitan Transit Authority (LACMTA) in the size of its fleet and the number of passengers served. In addition to DASH and Commuter Express, LADOT also operates the CityRide paratransit service, which was not part of this review.

LADOT is funded, in part, by California's Proposition A, which established sales tax revenue for local transit providers in communities that vote to opt in. Voters in Los Angeles County adopted a half-cent sales tax in 1980. The first DASH route began operation in the downtown area in

1985. Commuter routes and additional local routes were added in 1987, and the system grew substantially in the 1990s. At the time of the on-site review, LADOT had 8 downtown DASH routes, 2 downtown shuttles, 30 Community DASH routes (operating outside Downtown), and 16 Commuter Express routes. Also at the time of the review, the fare for DASH routes was 25 cents; free transfers were not provided. Fares for Commuter Express were based on zones and ranged from \$0.90–\$3.10.

Owing to budget constraints at the time of the on-site review, LADOT had recommended fare increases and service reductions to the City Council. Under these recommendations, DASH fares would increase to 35 cents in fiscal year (FY) 2010–11 and to 50 cents in FY 2011–12. The recommended service cuts include elimination of 2 Downtown DASH routes, 4 Community DASH routes, and 3 Commuter Express routes and reduction of hours, frequency, and/or Sunday and holiday service on 14 DASH routes and 5 Commuter Express routes.

LADOT maintains a website ([www.ladottransit.com](http://www.ladottransit.com)) with schedule, fare, and route information, rider bulletins, and other information. LADOT fixed route bus routes operate in the same service areas as LACMTA routes and in the same service area as bus routes operated by several smaller municipal transit systems. These transit providers share bus stops with LADOT in downtown Los Angeles and many neighborhoods throughout the city and beyond the city boundaries. DASH routes serve areas from Northridge to San Pedro, and LADOT Commuter Express routes extend from the Simi Valley and Pasadena in the north to Long Beach in the south.

The City of Los Angeles owns the LADOT fixed route fleet, which comprises 341 vehicles; 223 are used for DASH routes and 118 are used for Commuter Express routes. Contractors operate all routes and maintain the vehicles assigned to them. There are seven DASH contract packages and two Commuter Express contract packages. Each package represents part of the service that contractors provided to LADOT, and each has an assigned project manager (PM). Table 1.1 shows the routes for each package and contractor. Except for Packages 1 and 2 (P1 and P2), which are combined, each package has a separate GM and staff of supervisors, drivers, maintenance, and administrative personnel.

At the time of the on-site review, 23 of the 223 buses used on DASH routes had automatic voice annunciators (AVAs). The review team observed AVA-equipped buses operating on the following Community DASH routes: Wilmington, Van Nuys/Studio City, and Panorama City/Van Nuys. Buses equipped with PA systems and interior and exterior speakers serve nearly all other DASH routes. On the Commuter Express routes, nearly all of the buses were equipped with PA systems with interior speakers only. The fleet is described in more detail in Chapter 3.

**Table 1.1 – LADOT Contract Packages**

<b>Package</b>	<b>Routes</b>	<b>Contractor</b>	<b>Assigned Routes</b>
1 and 2	17	Veolia Transportation	Beachwood Canyon, Crenshaw, Fairfax, Highland Park/Eagle Rock, Hollywood, Hollywood/Wilshire, Hollywood/West Hollywood, Hyde Park, King-East, Los Feliz, Lincoln Heights/Chinatown, Leimert/Slauson, Mid town, Observatory Shuttle, Pueblo del Rio, Southeast, Wilshire Center/Koreatown.
3	5	Veolia Transportation	Northridge, Panorama City/Van Nuys, Van Nuys/Studio City, Warner Center – North, Warner Center – South
4	3	MV Transportation	Boyle Heights/East LA, El Sereno/City Terrace, Pico Union/Echo Park
5A	3	Veolia Transportation	Chesterfield Square, Vermont/Main, Watts
5B	2	MV Transportation	San Pedro, Wilmington
6	8	Veolia Transportation	Downtown DASH A, B, C, CCE, D, DD, E, F
8A	8	First Transit	Commuter Express 142, 430, 431, 437, 438, 448, 534, Metrolink Bunker Hill shuttle
8B	9	MV Transportation	Commuter Express 409, 413, 419, 422, 423, 549, 573, 574, 575
<b>Total</b>	<b>55</b>		

## 1.4 Rider Comments

In the experience of FTA, input from transit riders who rely on stop announcements and route identification can be helpful in conducting reviews. This input assists the reviewers in identifying specific problem areas to be addressed during the course of the review. In addition, the input provides anecdotal support to reviewers' observations and analyses. The review team gathered this input from interviews with riders, rider groups, and agency representatives and by reviewing LADOT complaint records.

At the time of the on-site review, FTA had no complaints on file regarding LADOT stop announcements and route identification.

## Agency and Rider Interviews

The review team interviewed four riders by telephone. Local organizations serving people who are blind or who have vision impairments provided rider names and contact information and included Community Rehabilitation Services, Independent Living Centers of Southern California, Westside Center for Independent Living, and Junior Blind of America. The review team asked riders about their most frequently-used routes. Most of their comments were related to trips on LADOT routes (as opposed to routes operated by LACMTA or suburban bus



systems). Attachment D includes the questionnaire. Specific rider comments are presented in Chapter 4 (on-board stop announcements) and Chapter 5 (route identification announcements).

All four riders mentioned erratic and unpredictable stop announcements. They reported that drivers never identify the bus route or destination, even at transfer points, unless they make such a request. Each rider said they believed LADOT buses were not equipped with external speakers.

None of the riders mentioned an issue with requesting stops. They all said that the pull-cord or push-tape system is effective and sufficient in requesting a stop.

None of the riders had filed complaints with LADOT on these issues in the past. Three of the four riders mentioned that they take LACMTA buses more regularly because they better accommodate fixed route riders with disabilities and riders in general.

## 2 Summary of Findings

This chapter summarizes the findings made as a result of the review. Findings denote deficiencies in ADA compliance or topics on which FTA requires additional reporting to ensure that an ADA compliance issue does not exist. Findings always require corrective action and/or additional reporting. Recommendations are statements detailing suggested changes to policy or practice to ensure best practices under the ADA. The basis for findings and recommendations is detailed in Chapters 3, 4, and 5.

### 2.1 Findings Regarding Stop Announcements and Route Identification Requirements

1. The LADOT RFP/contract sections requiring ADA compliance are general in nature and do not reference specific sections of the regulations or list specific ADA requirements with which contractors are to comply regarding stop announcements, orientation announcements and route identification. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity must ensure that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service. LADOT must ensure that all contract sections requiring ADA compliance enumerate the applicable sections of the regulations.
2. The contractors' penalty for failure to make stop announcements for regular DASH service is \$200 per occurrence, and the penalty for failure to make stop announcements for Commuter Express service is \$100 per occurrence. This lack of uniformity is inconsistent with Section 37.23(a) and the applicability of ADA to both local and commuter service. LADOT must establish, communicate, and enforce standards equally for local and commuter service.
3. There is no specific penalty provision in the contracts for failure to make route identification announcements. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity must ensure that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service. LADOT must establish, communicate, and enforce standards for making route identification announcements, or other 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, as required by Section 37.167(c).
4. While the contractors' training programs all include sections on ADA requirements, it does not appear that the requirements relating to stop and orientation announcements and the requirement for effective route identification are adequately stressed during training. Section 37.173 requires that personnel be trained to proficiency as appropriate to their duties so that they properly assist individuals with disabilities; this includes making all announcements as required by Section 37.167(b) and (c). LADOT must establish, communicate, and enforce standards for training with respect to Section 37.167 (b) and (c).

5. LADOT assigns a PM to each DASH or Commuter Express contract package. The PMs are responsible for oversight of the package, including a requirement to spend two days per week conducting field inspections. There is no standard written checklist used to record these field inspections. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity must ensure that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service. LADOT must institute procedures to monitor compliance with its standards for making announcements.
6. LADOT retains complaint documentation as required by Part 27.121 of the DOT ADA regulations. There were 15 complaints on file with LADOT regarding missed stop announcements; the complaint documentation indicated that the contractor followed up with the driver in 6 of the cases. However, for the remaining nine complaints, there was no follow-up documentation. Part 27 does not require follow-up to complaints, but lack of follow-up to a majority of complaints indicates that LADOT is not monitoring contractor performance to ensure that contractors are performing to LADOT's standards relative to the requirement in Part 37.167(b) to make stop and orientation announcements. To ensure compliance with this requirement, LADOT must document the follow-up process for all complaints. To ensure compliance with this requirement, LADOT must have documentation for follow-up to all complaints.
7. Not all PMs enter the results of their field inspections into LADOT's TransTrack database. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity must ensure that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service. LADOT must institute procedures to monitor compliance with its standards for making announcements.
8. LADOT requires contractors to use outside firms to perform service-quality checks on DASH and Commuter Express service, and LADOT uses vendors to perform its own quality checks. These service-quality checks do not sufficiently assess compliance with making required stop and orientation announcements. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity shall ensure that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service. LADOT must ensure that its vendors and the contractors' vendors for DASH and Commuter express include the requirements of Section 37.167(b) and (c) in quality checks.
9. The service-quality checks that contractors perform using outside firms do not include route identification checks. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity must ensure that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service. Section 37.167(c) requires the transit entity to 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. LADOT must establish standards for contractor performance on route identification announcements (or other means that LADOT elects to use to satisfy the regulation), communicate those standards to contractors, and monitor contractor performance to ensure that contractors are performing to LADOT's standards. The quality checks must address this requirement.

10. All contractors use a progressive disciplinary process consisting of at least three steps. Only MV Transportation had disciplined drivers within the 12 months prior to the on-site review for failure to make announcements; there were no driver terminations or suspensions for failure to make stop or route identification announcements. Also, only Veolia employed covert monitoring of drivers. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity must ensure that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service. The lack of disciplinary actions by contractors when compared to the observations of the review team indicates that LADOT was not fulfilling these requirements in managing its contractors. LADOT must ensure that all of its contractors are using effective monitoring and discipline as necessary to comply with its standards for meeting the requirements of Sections 37.167(b) and (c).
11. LADOT has elected to use route identification announcements to meet the requirements of Section 37.167(c). Most buses used for DASH service have PA systems with internal and external speakers. Most buses used for Commuter Express lack external speakers, and the oldest buses in the fleet have inoperable PA systems that cannot be repaired owing to unavailable parts. At the time of the review team's site visit, LADOT planned to replace the Commuter Express fleet over the next three years. Section 37.161 requires that all accessibility features of vehicles be maintained in operative condition; systems to facilitate communication with persons with impaired vision are specifically mentioned in 37.161(a). LADOT must regularly inspect speakers and replace or repair them if they are not working properly.

## **2.2 Findings Regarding On-Board Stop Announcement Performance**

1. Many of the drivers that the review team interviewed were not able to list the types of stops that are required to be announced, although many of them said they announce all stops. None of the drivers stated that ADA requires them to announce stops at sufficient intervals for passengers to orient themselves. Some drivers mentioned that they frequently announce stops if they judge that a passenger on the bus was a person who had low vision. Limiting stop and orientation announcements in this manner could potentially exclude some customers with disabilities. Furthermore, stop and orientation announcements are intended to provide access for people with other types of disabilities, not just people with vision disabilities and blindness. Section 37.173 requires operators to be trained to proficiency in meeting all ADA requirements, including Section 37.167(b). LADOT must establish standards for contractor performance on stop announcements, communicate those standards to contractors, and monitor contractor performance to ensure that contractors are performing to LADOT's standards.

2. Of the 64 route segments observed by the review team, LADOT made at least 80 percent of the stop announcements for only 14 segments (22%). All stops (i.e., 100%) were announced on only 12 of the observed route segments. On 30 of the 64 route segments observed by the review team, no stops were announced. On another five route segments, the driver announced a single stop, prompted by a review team member's request. This performance indicates inadequate compliance by contractors with Section 37.167(b), which requires announcement of stops to passengers on transit vehicles. LADOT must establish standards for contractor performance on stop announcements and orientation announcements, communicate those standards to contractors, and monitor contractor performance to ensure that contractors are performing to LADOT's standards.
3. Stop announcement performance was slightly better on Commuter Express routes than on DASH routes. At least 80 percent of stop announcements were made on 27 percent of the Commuter Express route segments observed. At least 80 percent of stop announcements were made on 21 percent of the DASH route segments observed. LADOT must establish standards for contractor stop announcements and orientation announcements, communicate those standards to contractors, and monitor contractor performance to ensure that contractors are performing to LADOT's standards.
4. On DASH routes, approximately 30 percent of the observed announcements made without the PA were judged to be inaudible. All announcements made by AVA or PA were judged to be audible. Several interviewed drivers said they preferred not to use the PA system. These findings indicate inadequate compliance with Section 37.167 (b), which requires announcement of stops to passengers on transit vehicles. LADOT must establish standards for contractor performance with respect to the audibility of stop announcements and orientation announcements, communicate those standards to contractors, and monitor contractor performance to ensure that contractors are performing to LADOT's standards.

## 2.3 Findings Regarding Vehicle/Route Identification Performance

1. At the time of the on-site review, LADOT had elected to use external route identification announcements as its means of route identification at all stops served by more than one bus route, but it had not implemented these announcements. Section 37.167(c) of the DOT ADA regulations requires the transit entity to 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. LADOT must implement an effective means of route identification and ensure that the means is communicated to all fixed route riders, including visitors. This includes compliance with Section 37.161(a) with regard to maintaining external speakers on buses that have them, and using training, monitoring, and discipline to achieve compliance. Section 37.161(b) also requires that when an accessibility feature such as an external speaker is out of order, reasonable steps, such as making audible announcements by voice, must be taken to accommodate individuals with disabilities. Alternatively, LADOT may elect to institute another method to comply with the regulation (such as colored mitts or numbered cards described in Appendix D to the regulation), and

establish, communicate, and monitor contractor compliance with standards to implement this method.

2. All drivers reported that they make verbal external announcements if they suspect that a passenger at the stop cannot read the headboard or seems otherwise confused. Limiting external route identification announcements in this manner could potentially exclude some customers with other types of disabilities, not just people with vision disabilities and blindness, at all stops serving multiple routes. Section 37.167(c) requires an effective means of route identification or means of identifying to the vehicle operator that a person seeks a ride on a particular route, regardless of whether or not the disabilities of the waiting patrons are evident. LADOT must establish standards for contractor performance on route identification announcements, communicate those standards to contractors, and monitor contractor performance to ensure that contractors are performing to LADOT's standards. LADOT may elect to institute another method to comply with the regulation (such as colored mitts or numbered cards described in Appendix D to the regulation), and establish, communicate, and monitor contractor compliance with standards to implement this method.
3. Review team members observed 83 buses at stops served by more than one route; no route identification announcements were heard during their observations. LADOT must require contractors to train, monitor, and discipline their drivers to achieve compliance with LADOT's standards for meeting the requirements of Section 37.167(c).



### **3 Stop Announcement and Route Identification Compliance Efforts**

Sections 37.167(b) and 37.167(c) of the DOT ADA regulations require announcement of stops to passengers on transit vehicles and identification of transit routes to people waiting at stops. This chapter presents information about LADOT’s efforts to comply with the regulations requiring that drivers announce stops and identify routes to riders. The review included:

- LADOT’s policies and procedures and requirements for contractors
- LADOT’s monitoring of contractor adherence to the policies and procedures, including training practices and written materials, monitoring of employee performance, and disciplinary procedures

Prior to the on-site review, LADOT provided the review team with written information on its policies and procedures for stop announcements and route identification to the review team. While on site, the review team interviewed LADOT managers and supervisors about management and monitoring of contractors regarding their performance with respect to ADA regulations. The review team also interviewed GMs, maintenance managers, and drivers at First Transit, MV Transportation, and Veolia Transportation.

#### **3.1 Policies and Procedures**

##### **LADOT Stop Announcement and Route Identification Standards**

LADOT’s policy regarding on-board stop announcements is contained in the Request for Proposals (RFP) issued by the City of Los Angeles for transit service. Because these RFP provisions were incorporated into the final contract for the selected contractor, this discussion is a review of the contract language.

The language pertaining to ADA compliance in the RFP is vague and does not reference any specific section of the applicable DOT ADA regulations. In addition, the RFP does not contain any specific references to external route identification announcements at stops serving more than one route. Based on review team interviews with LADOT managers, LADOT has chosen to use a method other than route identification announcements to meet the requirements of Section 37.167(c) of the regulations (such as an alternative means using colored mitts or numbered cards, which are described as possible methods in Appendix D to the regulations.)

The specific language for the DASH and Commuter Express RFPs varies slightly, as does the stated penalty for failure to announce major stops and transfer points. Section 6.A.9 of the RFP for DASH service states that the contractor must “provide a program of operator training in vehicle operations, defensive driving, passenger relations, ADA requirements....”

In addition, the RFP for Commuter Express Service Regions 1 and 2 (August 2007) and the RFP for DASH Service Package 1 (P1), P2, and P3 (April 2009) require semi-annual service-quality checks, which includes adherence to ADA requirements (Section 4.D). Section 7.B.16 (“Operating Performance Penalties”) calls for penalties of \$200 per occurrence for failure of a driver to announce major stops and transfer points.



LADOT’s separate RFP for Commuter Express has slightly different language regarding ADA requirements and announcing stops and transfer points. Section 4.A of the RFP requires the proposer to “describe how it will maintain a driver sensitivity and empathy training program directed toward the needs of disabled passengers in compliance with the Americans with Disability Act (ADA).” Section 4.D requires semi-annual service-quality checks, including adherence to ADA requirements. Section 4.E calls for penalties of \$100 per occurrence for failure to announce major stops and transfer points while in revenue service.

## **Bus Stop Signage**

In Downtown Los Angeles, more than a dozen commuter routes, LACMTA local and limited-stop routes, and DASH routes may use a single bus stop. Placards indicate Commuter Express stops served by LADOT contractors with the Commuter Express logo and route number. LADOT DASH stops are clearly indicated by a standard sign with the DASH logo. LACTMA operates express routes that are numbered similarly to the LADOT Commuter Express routes, and both the LACTMA and LADOT routes are listed on the same placard. In addition, many commuter bus stops are shared with services operated by other jurisdictions, such as Santa Monica’s Big Blue Bus.

## **3.2 Driver Training**

Proper training is essential for implementing a successful stop announcement and route identification program. Training to proficiency that is relevant to job function is a requirement under Section 37.173 of the DOT ADA regulations. At the time of the on-site review, LADOT’s three service contractors used corporate training programs. The amount of training time varied among the contractors and ranged from 79–173 hours. As described below, all provided approximately 40 hours of classroom training time, as well as behind-the-wheel training in both non-revenue and revenue service.

### **Contractors’ Driver Training Programs**

A review of the three contractors’ training programs showed that the programs are similarly structured. Training is conducted independently at each contractor site using corporate training materials.

All contractors provide new drivers with approximately 40 hours of classroom training. In all cases, the classroom training includes a module covering ADA issues. The amount of time spent covering ADA and disability awareness varies by contractor and ranges from 3–7 hours. Each contractor’s ADA training includes the instruction that drivers are to announce stops, major destinations, transfer points, and any stops requested by individuals. Only two of the training programs (Veolia and First Transit) mention the need to make external route identification announcements. In light of the review team’s observations of performance in making external announcements, it is apparent that the need to make external route identification announcements is not sufficiently covered during training (see Chapter 5).

### **Veolia Transportation**

The review team visited the Veolia Transportation site for contractor packages P1 and P2 to learn about the training program at that location. Veolia provides new drivers 155–173 hours of training. The training program starts with 38.5 hours of classroom training, called the Operator

Development Program (ODP), for new drivers. Day Two provides four hours of sensitivity training and Day Three includes three hours of ADA training. ADA training includes a list of nine rules specific to fixed route service. Two of the rules included in Veolia's "Americans with Disabilities Act Review" address stop announcements and external route identification announcements:

Drivers must announce stops at major intersections and destinations, transfer points, and at the request of passengers with disabilities. Recorded announcements are acceptable.

Where more than one bus serves the same stop, drivers must provide a means to help passengers with visual disabilities to identify their buses.

Once the classroom training is completed, the trainee participates in the 17-hour Pre-Driving Skills (PDS) training. This portion involves operating a vehicle on a closed course and includes skills such as judging stops, backing, alley docking, parallel parking, and controlled right turns. After completing the PDS training, the trainee moves on to non-revenue road training, driving in traffic on bus routes. This training lasts 37.5 hours unless the driver is already credentialed from a previous job. Drivers who are already credentialed from a previous job must go through 20 hours of road training before proceeding to the final portion of the training program, known as "cadetting." In this step, a new driver goes into revenue service with a driver/trainer on board. Generally, during the first few days, the new driver rides along in revenue service, observes, and then takes over as driver of the vehicle while the trainer observes and evaluates performance. Cadetting generally lasts 80 hours.

Veolia holds monthly driver safety meetings, during which accidents, incidents, and complaints are reviewed. The Training and Safety Manager indicated that he selects an observed trend in the complaints and incidents and focuses on that issue during the monthly safety meeting. Retraining (remedial training) based on complaints and incidents is provided as needed for individual drivers. Remedial training generally lasts 2–4 hours. At the time of the on-site review, Veolia was entering the second year of the contract and planned to provide one-day refresher training to all drivers.

## **MV Transportation**

MV Transportation provides 84–102 hours of training for new drivers. The training consists of 40 hours classroom training, 20–30 hours of behind-the-wheel training, and 24–32 hours of cadetting.

The classroom training starts with the history of MV Transportation, knowledge of the vehicle, and customer service issues. The customer service part of the training involves watching a DVD that presents various customer service scenarios, including serving customers with disabilities. After viewing each scenario, the class discusses how to handle the situation. The part of the classroom training specific to ADA takes about four hours to cover. The ADA module includes a discussion of ADA requirements, questions about rights, discrimination, accommodation and special treatment, mobility equipment features, wheelchairs and lift operating procedures, assisting customers with service animals, and stop announcements.

The instruction on stop announcements states that a driver must announce:

- Major destinations
- Time points listed on the schedule
- Transfer points
- Stops requested by customer

In the ADA portion of the classroom training, the trainees are given a copy of the *Transit Operator's Pocket Guide (Pocket Guide)* developed by Easter Seals Project ACTION. The *Pocket Guide* provides more detail on the requirement to announce stops. It states that drivers are required to:

- Announce stops at all major intersections, transfer points and major destination points
- Announce stops at sufficient intervals along a route to orient a person with a visual disability to the vehicle's location
- Announce any stop requested by a passenger

The *Pocket Guide* and other written materials used by MV do not speak directly to drivers making external route identification announcements at bus stops served by vehicles for more than one route. This is inconsistent with LADOT's policy of requiring drivers to make external route identification announcements.

After the classroom training is completed, a new driver goes through 20–30 hours of behind-the-wheel training, not in revenue service. This part of the training focuses on the skills needed to operate the vehicle and the equipment in the vehicle. New drivers are rated on 31 different skills. The rating ranges from 1 (unacceptable) to 5 (excellent). A new driver must attain a rating of 90 or above to graduate to the next phase of the training.

The final stage of training is cadetting. The new driver is evaluated using the same form as is used in the previous training stage; this part of the training lasts 24–32 hours.

The MV Transportation Training Manager indicated that MV conducts two or three refresher trainings per year in addition to the regular monthly safety meetings. The corporate office sets the topics covered at the safety meetings. One of the 10 mandatory topics is "ADA and Transportation." Individual MV Transportation sites are encouraged to add relevant and timely meeting topics. At the time of the on-site review, MV anticipated reducing the frequency of safety meetings from monthly to bi-monthly.

## First Transit

The training program at First Transit encompasses approximately 79 hours of training. The first 40 hours is classroom training followed by 24 hours of behind-the-wheel training and 15 hours of cadetting, where a new driver is in revenue service with an experienced driver.

The classroom portion of the training includes material developed by First Transit, the Transportation Safety Institute, the National Transit Institute (NTI), and the Community Transportation Association of America (CTAA). The ADA module consists of one hour on ADA requirements and four hours on assistance guidelines for older adults and passengers with disabilities.

The study guide given to the new drivers provides a basic overview of the ADA and states that drivers are required to announce the following:

- Bus and route number to customers standing outside of the bus
- Stops
- Transfer points
- Points of interest
- Route and direction of travel at intervals
- Stops requested by customers

The trainees are also informed that failure to comply will result in disciplinary action up to and including termination and that a non-working microphone is not a valid excuse to failing to make the required announcements. At the end of the ADA portion, each student is required to pass a customer service/ADA test with a score of at least 80 percent. A student who fails the test must retake it to move on to behind-the-wheel training.

There are two versions of the 20-question customer service/ADA test. A student failing one of the tests is retested using the second version of the test. The questions on Test #1 deal mostly with customer service matters that may touch upon disability-related issues. While Test #2 is similar to Test #1, it contains four questions that mention the ADA. Neither test contains questions that specifically address making stop announcements or route identification announcements.

After the classroom training is completed, the behind-the-wheel training takes place. This consists of 6 hours on a closed course (including an ADA review) and 18 hours on bus routes. The balance of the material in the closed course and on-road work consists of various driving skills needed to operate the vehicle. When trainees have successfully completed the behind-the-wheel training, they proceed to the cadetting portion of the training.

When a new driver is hired, he or she is provided with an employee handbook, which is divided into 11 chapters. Chapter 10 of the handbook is titled “Operators and Safety Sensitive Employees.” The section of Chapter 10 dealing with ADA requirements lists 21 guidelines, one of which addresses stop announcements:

Operators must announce stop and transfer points on fixed routes. Also operators are required to announce stops upon the request of a customer with a disability.... Operators must announce, outside of the bus, their route number at transfer points and bus stops serviced by other routes to assist sight impaired customers who find it hard to read a bus destination sign.

First Transit conducts monthly driver meetings. At each meeting, LADOT and ADA issues are discussed. ADA issues are also addressed via memos to drivers and at the driver meeting after the memo is distributed. At the time of the on-site review, the review team was provided with a copy of the most recent ADA memo, dated February 2, 2010. The memo cited language from Sections 37.167(a) and (b) of the DOT ADA regulations on announcing stops and the need for external route identification. Operators are informed that “FTA will be auditing our service over the next few months...” and that an operator failing to announce stops will be subject to the progressive disciplinary process up to and including dismissal.

### 3.3 Complaint Handling Process

The DOT ADA regulations require public transit providers to receive complaints from riders, to resolve them promptly and equitably, to keep copies of complaints on file for 1 year, and to maintain a summary of complaints on file for five years (49 CFR 27.13(b) and 27.121(b)). While requirements to respond to complaints are not included in the DOT ADA regulations, it is a common and effective practice for a transit provider to respond to complaints and investigate allegations to ensure that all DOT ADA requirements are being met.

#### Complaint Policies and Procedures

LADOT invites customers to contact it to record a complaint via mail, via phone, online, or in person. In each case, complaints are forwarded to the Transit Store, LADOT's customer service office located across from City Hall. Transit Store staff gather information from any medium and enter it into a database, which LADOT shares with its service contractors, who can directly enter information regarding the resolution of the complaint. The complaint database provides a medium through which LADOT can review the complaint as well as the contractor's method of addressing it. The contractor resolves the complaint by reviewing details with the driver and, if applicable, a road supervisor who may have information about an incident that led to the complaint. Based on this input, the contractor's GM applies progressive discipline (as described in Section 3.5, "Contractor Monitoring and Discipline") and enters a description of this action into the database so that LADOT staff can communicate the resolution to the complainant. At the time of the on-site review, LADOT staff said that they regularly follow up with both the complainant and the contractor to ensure that issues were properly addressed.

According to Transit Store staff, it is expected that all LADOT buses carry complaint cards for passengers to complete and mail to the Transit Store, where staff members transcribe information into the database from the card, including contact information and the nature of the complaint. A copy of the complaint card is provided in Attachment E.

Customers may also call the Transit Store; its telephone number (213-808-2273) is available on complaint cards, online, and from drivers. Upon receiving a customer call, Transit Store staff members record the complaint along with the complainant's contact information and identification of the driver, bus number, and/or bus route into the database. A complainant may also visit the Transit Store, at which staff follow similar procedures as if the complaint were made by mail or phone.

A customer may also file a complaint on line. Listed near the bottom of LADOT's Transit Services website, a link sends users to LADOT's complaint form, where complainants may submit contact information, request a particular method of response from LADOT or its contractors, and include information about the service type, route number, bus number, date, time and location of incident, and information about the driver.

LADOT requires contractors to address complaints to the satisfaction of the LADOT PM. As mentioned in Chapter 1, PMs are LADOT employees assigned to oversee the contractor of one or more packages.

## Analysis of Complaints

In response to an FTA notification letter dated January 22, 2010, LADOT provided the review team with all stop-announcement-related comments from the preceding year (April 2009 to April 2010). Each complaint includes the date, details, and LADOT response. Complaints are categorized into six categories, including Operator/Bus Service Performance. This is further divided into eight types of complaints, including “Did not call out stop.”

On file were 15 complaints regarding missed stop announcements, 10 involving rude drivers, 6 involving late-arriving buses, and 7 concerning other issues. By contractor, nine stop announcement complaints concerned Veolia and six related to MV Transit; there were no stop announcement complaints regarding First Transit. By service, 11 stop announcement complaints concerned Dash routes, and 4 concerned Commuter Express routes.

The complaint documentation indicated that the contractor consulted the driver in six cases. The follow-up involved monitoring the drivers’ future performance in two cases, and providing remedial training to the driver in one case. For the remaining 12 complaints related to stop announcements, no follow-up information was documented.

### 3.4 LADOT Monitoring of its Contractors

As discussed in Chapter 1, LADOT divides the DASH and Commuter Express services among eight packages. Each package represents part of the service provided by contractors for LADOT, and each has an assigned PM. The review team met with the PM responsible for one of the DASH packages and the PM responsible for a Commuter Express package. Both PMs indicated that their approach to field inspections was representative of the approach to field inspections for all of the packages.

According to the PMs interviewed, they typically spend two days each week conducting field inspections. These inspections may take place at the garage location or occur on street, usually at the end points of bus routes.

When conducting an on-street inspection, PMs:

- Test the PA system and the volume and functionality of the interior speakers
- Examine the destination signs
- Test the wheelchair ramp
- Check that all securement straps and passenger restraints are present and in working order

Failure for any of these items may result in a penalty, as specified in the RFP. The interviewed PMs said that whereas they previously used a written checklist to conduct these inspections, the checklist was currently being used only as a training aid for new PMs. The PMs reported that there is no standard procedure to inspect vehicles, although at the time of the on-site review LADOT was developing a standardized procedure for vehicle inspections.

PMs do not check to see if drivers make external route identification announcements. On occasion, PMs may conduct a ride-along and board a bus in revenue service to observe the driver’s performance.

When inspections occur at garages, PMs:

- Review maintenance records
- Inspect buses for cleanliness and physical condition
- Observe pullout inspections by drivers
- Talk to drivers to get their input

The PMs also interview riders waiting at bus stops and sometimes board a bus for a ride-along to observe the driver's performance. If an issue with a driver is observed, the PM conducts a ride-along with the same driver again within a week.

The interviewed PMs stated that they check the complaint system daily and follow up as required. Each PM may assess penalties on the contractors if the contractors fail to respond appropriately and in a timely fashion to the complainant.

PMs may issue penalties for any discrepancies found during their field inspections. In the 12 months prior to the on-site review, LADOT had not assessed any penalties to contractors for failure to announce bus stops. Over the same period, PMs did assess penalties for issues with lifts such as operating with inoperable lifts or for vehicle pass-bys (i.e., not stopping for a customer who uses a wheelchair waiting at a stop).

As discussed further in Section 3.5, to provide the required reports to LADOT, the contractors use road supervisors to monitor their drivers. The contractors report the results to LADOT in an "ADA Compliance Weekly Report." The report indicates the number of observations of non-compliance along with remarks describing measures taken to correct the non-compliance. The GM for each package is required to review and sign the report before sending it to LADOT. An example of an "ADA Compliance Weekly Report" can be found in Attachment F.

LADOT holds bi-weekly meetings with each contractor individually to discuss maintenance, operations, and other service-related issues. The standing agenda, also included in Attachment F, includes a review of LADOT field checks and the contractor's "ADA Compliance Weekly Reports." Any discrepancies found by PMs during their field checks are brought to the attention of the package's GM at the bi-weekly meeting.

As mentioned in Section 3.1, at the time of the on-site review, LADOT was beginning to require contractors to have a semi-annual service-quality check performed by an outside company reporting directly to the contractor. This requirement, particular to semi-annual service monitoring, was instituted in 2008; the requirement is not in all of the contracts. Contractors submit the results of completed service-quality checks to the PM for review and discussion at the bi-weekly contractor meeting. Contractors develop action plans to address any issues raised in the report.

LADOT also contracts with an outside firm to conduct annual service-quality checks. The review team analyzed the 2010 results for the DASH 5A Package. The report for P5A found that 41 percent of the observed drivers announced bus stops. The 2010 percentage was lower than in 2009, when 54 percent of the observed drivers for P5A made stop announcements. The report did not specify what percent of stops a driver needed to announce for LADOT to consider performance as satisfactory.

In October 2009, LADOT began using TransTrack, a system that enables PMs to record their field observations. When PMs find a deficiency in their field inspections, they can enter the information in TransTrack and automatically assess a penalty. Contractors have access to data

relating to their specific package of services. A contractor has 10 days to respond to any deficiencies entered into TransTrack. However, at the time of the on-site review, the use of TransTrack had not been fully implemented. The software was installed and functioning properly, but not all of the PMs were entering the results of their field reviews into the system.

### **3.5 Contractor Monitoring and Discipline**

While on site, the review team met with LADOT contractors regarding monitoring service provision and driver performance and visited at least one garage for each provider under contract to LADOT. At each location, the person responsible for monitoring day-to-day service and driver discipline had the title of either the Operations Manager or the Assistant GM. The review team obtained information about monitoring activities, the progressive discipline process, and specific information regarding disciplinary actions against drivers for failure to announce stops or provide make external route announcements.

#### **Summary of Monitoring and Disciplinary Procedures**

Each contractor uses Road Supervisors to monitor driver performance and employs a multi-step, progressive discipline process in its operations. The process for each starts with a verbal warning or counseling, a written warning, a written warning with suspension, and termination as the final step. Of the three contractors, only MV Transportation combines the written warning with a three-day suspension followed by termination. Monitoring procedures vary slightly among the three contractors reviewed, but only Veolia uses a form that specifically addresses stop announcements. None of the monitoring forms addresses route identification announcements. Only MV Transportation had disciplined drivers within the previous 12 months for failure to make announcements.

#### **Veolia Transportation**

The review team visited the Veolia garage for P6 (Downtown DASH). At this location, there were approximately 114 drivers and 15 Road Supervisors (approximately one Road Supervisor for every eight drivers). Activities performed by Road Supervisors include:

- Monitoring the service area for closed or damaged streets
- Monitoring on-time performance
- Following buses in revenue service to monitor safe driving
- Talking to passengers at major bus stops or at vehicle layovers
- Conducting ride-along checks

Each of the 15 Road Supervisors is required to conduct three ride-alongs each week (45 per week). They use a ride-along checklist (found in Attachment G) to indicate satisfactory or unsatisfactory performance by a driver. While one measure on the checklist is “Call all stops properly,” this is inconsistent with information drivers provided when interviewed by the review team. Drivers reported that they are expected to announce major stops and transfer points at a minimum. In addition, the checklist makes no reference to external route identification.

Once the checklist is completed, the Road Supervisor reviews the checklist with the driver and both sign the checklist. The Operations Manager reviews the completed form and may refer the driver to the Safety and Training Manager for remedial training if the form indicates



unsatisfactory performance. A copy of the completed form is kept in the driver's file in the Safety and Training office.

The review team also visited the site for Combined P1 and P2 (17 neighborhood DASH routes), also operated by Veolia. This package uses a different Operator Evaluation Form (also found in Attachment G). The Road Supervisor uses the detailed two-page checklist to rate driver skills as "Meets Expectations," "Needs Improvement," or "Not Applicable." The form includes a rating for ADA announcements. The driver signs the completed form and, if the Training Manager determines that additional training is needed, the GM also signs the form.

In addition to the ride-alongs, Veolia (P1 and P2) has a "secret rider" program (covert monitoring by a person not known to the driver). The secret rider rides on different routes each day and rides all runs; he/she may ride a specific run or focus on a specific driver in response to a complaint. The Operations Manager reviews the secret rider's reports and forwards them, if necessary, to the Training and Safety Manager for driver retraining.

Veolia use a four-step progressive disciplinary process:

- First Offense – verbal warning
- Second Offense – written warning
- Third Offense – three-day suspension
- Fourth Offense – termination

When the first offense occurs, Veolia counsels the driver and documents the offense for the driver's personnel file. When the second offense occurs, the driver receives a written warning detailing the nature of the offense. The Operations Manager and the driver sign the written warning; the driver receives a copy of the signed warning, and a copy is placed in the driver's personnel file. When a third offense occurs, the driver receives a three-day unpaid suspension. A written document, spelling out the offense and indicating that this is the Final Warning, is prepared; the document also indicates that this is the Final Warning. The Operations Manager and the driver sign the document. The driver receives a copy, and a copy is placed in the driver's file. A fourth offense results in termination. Veolia indicated that they did not have an appeals process, but a driver can use the grievance procedure in the union contract to challenge the dismissal. The union contract for the drivers for contract package 5A states that an offense cannot be held against a driver after one year if no further offenses have occurred.

In the 12 months prior to the on-site review, Veolia gave 4 drivers verbal warnings for failure to announce stops. There were no written warnings, three-day suspensions, or terminations for failure to announce stops or make external announcements in the previous 12 months prior to the on-site review.

## **MV Transportation**

The review team visited the MV Transportation garage for P4 (Boyle Heights/East LA, El Sereno/City Terrace and Pico Union/Echo Park). There are approximately 64 drivers and 10 Road Supervisors (about one Road Supervisor for every six drivers) at this garage. Road Supervisors:

- Observe and monitor routes
- Observe and monitor on-time performance

- Observe and monitor safe driving
- Observe and monitor how customers using wheelchairs are boarded and secured
- Coach drivers
- Perform ride-alongs
- Road check drivers

In addition to the occasional PMs' ride-alongs, each of the 10 Road Supervisors is required to observe 3 routes per week (30 total per week). These observations include the ride-alongs for purposes of completing the required weekly "ADA Compliance Report" for LADOT discussed above. In addition, MV road-checks every driver every 45 days and documents driver performance on the Operator Skills Evaluation and Refresher Training Form. A copy of this form is included in Attachment G. The form rates driver skills as Satisfactory (S), Unsatisfactory (U), or N/A. The form does not include an entry for rating the driver on how well he or she calls stops or makes external route announcements. The Director of Operations reviews this driver evaluation. Any unsatisfactory ratings or remarks may result in the driver being counseled or sent back for retraining depending upon the driver's previous evaluations. After sending a driver for retraining, MV performs an additional review after the training is completed. MV Transportation has a three-step disciplinary process:

- First Offense – verbal counseling
- Second Offense – written warning
- Third Offense – final written warning, three-day suspension, and pending termination

When the first offense occurs, the Operations Director counsels the driver. The driver, the Operations Director, and a witness sign a summary of the session. One copy of the written summary is placed in the driver's personnel file, one copy is given to the driver, and a third copy is sent to the union local. A second offense results in a written warning, which is prepared in triplicate and distributed in the same manner as the counseling summary. MV reported that a second offense could result in a final written warning depending upon the severity of the offense or the driver's record or attitude. A third offense results in a final written warning and a three-day suspension with termination upon the next offense. Before termination, the driver is given the option to file a grievance through the union. MV stated that depending upon the severity of the offense, the action could go directly from a verbal warning to termination. For example, failure to properly secure a passenger's wheelchair can lead to immediate termination.

In the 12 months prior to the on-site review, MV Transportation reported 29 instances of verbal counseling for failure to announce stops, 18 written warnings for failure to announce stops, and 3 final written warnings and suspensions for failure to announce stops. Based on a review of the disciplinary records from the prior year, there were no terminations for failure to announce stops.

## **First Transit**

The review team visited the First Transit facility providing service for P8A (Commuter Express Routes 142, 430, 431, 437, 438, 448, 534, and Metrolink Bunker Hill shuttle). There are 47 drivers and 10 Road Supervisors at this location.

Road Supervisors are responsible for in-service observations of drivers. They monitor on-time performance of all drivers and also observe drivers about whom a customer has complained. The

on-street review also includes a review of whether the buses and equipment are working properly. First Transit indicated that Road Supervisors conduct ride-alongs to observe driver performance but do not have a set number of ride-alongs that they are required to perform.

First Transit uses a four-step disciplinary process:

- First offense – verbal warning
- Second offense – written warning
- Third offense – written warning with a three-day suspension
- Fourth offense – termination

When a first offense occurs, the driver is counseled, and an Employee Consultation Report is completed and placed in the driver's personnel file. The second offense results in a written warning to the driver, with a copy going to the driver's file. A third offense results in a written warning and a three-day suspension. A fourth offense results in termination. Depending upon the severity of the offense, a driver may be discharged, suspended, or given a written warning on the first offense. The *Employee Handbook* describes four classes of infractions: Class 1 infractions subject the employee to discharge (convictions and imprisonment, certain safety violations, or violation of drug and alcohol rules); Class 2 infractions subject the employee to a suspension and final warning upon the first offense and may include absenteeism, personal misconduct, and violation of work rules or insubordination; Class 3 infractions result in a written warning upon the first infraction, and include offenses such as noncompliance with reporting policies and violation of work rules; Class 4 infractions are the least serious category of infraction and include violations of ADA stop announcement requirements. Violation of any of rules contained in this group may result in a written warning upon the first infraction. Subsequent infractions (up to four) may lead to discharge.

Based on a review of the disciplinary records from the prior year, there were no disciplinary actions for failure to announce stops or make external announcements.

## **3.6 Stop Announcement and Route Identification Equipment**

The buses used on DASH bus routes generally have both internal and external speakers for announcements of stops and identification of routes. Only 3 of the 223 buses used for DASH service lacked speakers, and an additional 4 buses had internal but not external speakers. Buses used for Commuter Express service generally had internal but not external speakers; 3 of the 118 Commuter Express buses lacked internal speakers.

At the time of the on-site review, LADOT was beginning to implement announcement of stops and route identification with an AVA system. The system had been installed on 23 of the 223 buses used by LADOT for DASH routes and was being used on 2 DASH bus routes for stop announcements; it was not being used for external route identification announcements. Buses with AVA installed had external speakers, and LADOT anticipated implementing automatic route identification announcements. AVA systems are under warranty for the first two years after installation and are serviced by the manufacturer at a location in the Los Angeles area. LADOT was retrofitting AVA on buses with compatible speakers and requiring newly-purchased buses to have AVA installed.

The review team met with vehicle maintenance staff at sites operated by three different contractors. The primary purpose of these discussions and analysis was to understand the procedures in place at each location for maintenance staff to learn about problems with, and make necessary repairs to, the PA systems on the buses. At the sites for Veolia P5A, P6, and MV P4, which are bases for DASH service, maintenance managers indicated that PA maintenance is a standard part of preventive maintenance (PM) inspections and that PA systems are generally in good working order. They promptly repair them when a driver reports a malfunction or if they find a problem when performing PM. Replacement parts for these repairs are generally available. At the First Transit site (Commuter Express), the maintenance manager indicated that PA inspections are a routine part of PM and that repairs are promptly made, except in the case of the 1992 S&S Apollo buses. As these older buses were no longer manufactured, replacement parts for the PA systems on these buses were no longer available. The PA systems are generally inoperable, and drivers must make unamplified announcements.

LADOT annually inspects all buses in its fleet and inspects the PA and AVA equipment. LADOT also performs quality control inspections on a sample of bus repair work orders to confirm that the reported defects were fixed.

## Bus Fleet

Tables 3.1 and 3.2 present LADOT's data on the various vehicle models and years, types of PA technology, and speaker configuration of the LADOT fixed route bus fleet. Except for P1 and P2, which are combined at a single site, buses for each package are based at separate sites independent of the other packages. The fleet consisted of 341 buses, with 118 in the 2 Commuter Express packages and 223 in the 7 DASH packages.

At the time of the on-site review, LADOT anticipated replacing all of the buses used for Commuter Express over the next three years.

**Table 3.1 – LADOT Fixed Route Bus Fleet and PA Equipment  
Commuter Express Vehicles**

Quantity	Make	Model	Year	Internal Speakers	External Speakers	Public Address System
3	Gillig	Phantom	1985	6	0	N/A
26	Gillig	Phantom	1987	6	0	N/A
12	Gillig	Phantom	1988	6	0	N/A
1	Gillig	Phantom	1991	6	0	N/A
14	S & S	Apollo	1992	4	0	N/A
41	Neoplan	Metroliner	1992	8	1	REI 700168
2	Gillig	Phantom	1996	3	0	N/A
3	ElDorado	E450	2001	0	0	N/A
5	Neoplan	Metroliner	2002	24	0	N/A
4	MTA	RTS 2		8	0	N/A
3	Orion	Orion V	2004	8	0	N/A
4	Gillig (leased)	Phantom	1996	3	0	N/A
<b>118</b>	<b>Total Commuter Express Vehicles</b>					

**Table 3.2 – LADOT Fixed Route Bus Fleet and PA Equipment – DASH Vehicles**

Quantity	Make	Model	Year	Internal Speakers	External Speakers	Public Address System	Automated Announcement System
4	Gillig	Phantom	1987	6	0	N/A	N/A
16	ElDorado	E-Z Rider	1998	4	1	REI 700168	N/A
32	ElDorado	E-Z Rider	1999	4	1	REI 700168	N/A
1	ElDorado	REA-29	1999	4	1	REI 700168	N/A
30	ElDorado	E-Z Rider	2000	4	1	REI 700168	N/A
3	Ford	Trolley	2001	4	1	REI 700168	N/A
3	ElDorado	E450	2001	0	0	N/A	N/A
40	ElDorado	E-Z Rider	2002	4	1	REI 700168	N/A
38	ElDorado	E-Z Rider II	2002	4	1	REI 700168	N/A
8	ElDorado	E-Z Rider II	2003	4	1	REI 700168	N/A
18	ElDorado	E-Z Rider II	2006	4	1	REI 700168	N/A
1	ElDorado	E-Z Rider II	2006	4	1	REI 700962	REI DRC600
5	ElDorado	E-Z Rider II	2007	4	1	REI 700168	N/A
22	ElDorado	E-Z Rider II	2009	4	1	REI 700962	REI DRC600
2	ElDorado	E-Z Rider II	2009	4	1	REI 700168	N/A
<b>223</b>	<b>Total DASH Vehicles</b>						

### 3.7 Findings

1. The LADOT RFP/contract sections requiring ADA compliance are general in nature and do not reference specific sections of the regulations or list specific ADA requirements with which contractors are to comply regarding stop announcements, orientation announcements, and route identification. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity must ensure that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service. LADOT must ensure that all contract sections requiring ADA compliance enumerate the applicable sections of the regulations.
2. The contractors' penalty for failure to make stop announcements for regular DASH service is \$200 per occurrence, and the penalty for failure to make stop announcements for Commuter Express service is \$100 per occurrence. This lack of uniformity is inconsistent with Section 37.23(a) and the applicability of ADA to both local and commuter service. LADOT must establish, communicate, and enforce standards equally for local and commuter service.
3. There is no specific penalty provision in the contracts for failure to make route identification announcements. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity must ensure that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service. LADOT must establish, communicate, and enforce standards for making route identification announcements (or other 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, as required by Section 137.167(c)).

4. Whereas all contractors' training programs include sections on ADA requirements, it does not appear that the requirements relating to stop and orientation announcements and the requirement for effective route identification are adequately stressed during training. Section 37.173 requires that personnel be trained to proficiency as appropriate to their duties so that they properly assist individuals with disabilities; this includes making all announcements as required by Section 37.167(b) and (c). LADOT must establish, communicate, and enforce standards for training with respect to Section 37.167 (b) and (c).
5. LADOT assigns a PM to each DASH or Commuter Express contract package. The PMs are responsible for oversight of the package, including a requirement to spend two days per week conducting field inspections. There is no standard written checklist used to record these field inspections. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity shall ensure that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service. LADOT must institute procedures to monitor compliance with its standards for making announcements.
6. LADOT retains complaint documentation as required by Part 27.121 of the DOT ADA regulations. There were 15 complaints on file with LADOT regarding missed stop announcements; the complaint documentation indicated that the contractor followed up with the driver in 6 of the cases. However, for the remaining nine complaints, there was no follow-up documentation. Part 27 does not require follow-up to complaints, but lack of follow up to a majority of complaints indicates that LADOT is not monitoring contractor performance to ensure that contractors are performing to LADOT's standards relative to the requirement in Part 37.167(b) to make stop and orientation announcements. To ensure compliance with this requirement, LADOT must document the follow-up process for all complaints. To ensure compliance with this requirement, LADOT must have documentation for follow-up to all complaints.
7. Not all PMs enter the results of their field inspections into LADOT's TransTrack database. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity must ensure that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service. LADOT must institute procedures to monitor compliance with its standards for making announcements.
8. LADOT requires contractors to use outside firms to perform service-quality checks on DASH and Commuter Express service, and LADOT uses vendors to perform its own quality checks. These service-quality checks do not sufficiently assess compliance with making required stop and orientation announcements. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity must ensure that the private entity meets the requirements of this part that would apply to the public

entity if the public entity itself provided the service. LADOT must ensure that its vendors and the contractors' vendors for DASH and Commuter express include the requirements of Section 37.167(b) and (c) in quality checks.

9. The service-quality checks that contractors perform using outside firms do not include route identification checks. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity must ensure that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service. Section 37.167(c) requires the transit entity to 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.... LADOT must establish standards for contractor performance on route identification announcements (or other means that LADOT elects to use to satisfy the regulation), communicate those standards to contractors, and monitor contractor performance, to ensure that contractors are performing to LADOT's standards. The quality checks must address this requirement.
10. All contractors use a progressive disciplinary process consisting of at least three steps. Only MV Transportation had disciplined drivers within the 12 months prior to the on-site review for failure to make announcements; there were no driver terminations or suspensions for failure to make stop or route identification announcements. Also, only Veolia employed covert monitoring of drivers. Section 37.23(a) requires that when a public entity enters into a contractual or other arrangement or relationship with a private entity to operate fixed route or demand responsive service, the public entity must ensure that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service. The lack of disciplinary actions by contractors when compared to the observations of the review team indicates that LADOT was not fulfilling these requirements in managing its contractors. LADOT must ensure that all of its contractors are using effective monitoring and discipline as necessary to comply with its standards for meeting the requirements of Sections 37.167(b) and (c).
11. LADOT has elected to use route identification announcements to meet the requirements of Section 37.167(c). Most buses used for DASH service have PA systems with internal and external speakers. Most buses used for Commuter Express lack external speakers, and the oldest buses in the fleet have inoperable PA systems that cannot be repaired owing to unavailable parts. At the time of the review team's site visit, LADOT planned to replace the Commuter Express fleet over the next three years. Section 37.161 requires that all accessibility features of vehicles are maintained in operative condition; systems to facilitate communication with persons with impaired vision are specifically mentioned in 37.161(a). LADOT must regularly inspect speakers and replace or repair them if they are not working properly.

## 3.8 Recommendations

The following are recommendations for LADOT's use to address the findings in the previous section.

1. In the RFP/contract, either refer to specific sections of the DOT ADA regulations regarding stop announcements, orientation announcements, and route identification or list the specific DOT ADA requirements that contractors are required to meet.
2. Standardize the penalty for failure to make stop announcements on the regular DASH and Commuter Express routes.
3. Include a specific penalty for failure to make route identification announcements in all future contracts.
4. Ensure that all LADOT contractor-training programs emphasize making required stop announcements and external route identification efforts as part of ADA compliance.
5. Regularly review complaint documentation and require contractors to remedy any deficiencies in complaint follow-up.
6. Ensure that contractors' training activities emphasize the requirements for making announcements, so that all bus operators are fully aware of them.
7. To standardize monitoring across and among the packages, ensure that LADOT PMs use the same written field inspection checklist and enter the results of field reviews and any assessed penalties into TransTrack.
8. Focus part of LADOT service-quality checks on compliance with required ADA stop announcements and external route identification efforts and define what constitutes driver compliance.
9. Require contractors to conduct covert monitoring or demonstrate that adequate performance is achieved by other means if no covert monitoring is conducted.
10. Take corrective action, including mentoring of contractors and application of penalties as necessary, to achieve compliance.
11. Consider a variety of means to achieve compliance with vehicle maintenance standards, including mentoring of contractors and application of penalties as necessary.
12. Require contractors to specifically address both required stop announcements and external route identification announcement efforts in its Road Supervisor observations; encourage all contractors to institute covert ride-checks of drivers.
13. Require outside firms and vendors to include checks of required stop announcements and route identification efforts either as part of contract service-quality checks or contractors' required service-quality checks on DASH and Commuter Express service.
14. Train PMs to use TransTrack for entering results of field inspections.



## 4 On-Board Stop Announcement Performance

Section 37.167(b) of the DOT ADA regulations sets forth the following requirement related to the announcement of stops on fixed route systems operated by public or private entities:

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.

This chapter focuses on LADOT performance in making stop announcements, including:

- Summary of consumer comments from telephone interviews
- Summary of driver comments from interviews with the review team
- Description of the review team’s method for observing on-board stop announcements
- Summary of information collected and observations of stop-announcement efforts

### 4.1 Consumer Comments

There were 15 complaints regarding stop announcements in the 12 months prior to the review. The four riders interviewed prior to the review all indicated that LADOT’s performance in making stop announcements was very poor.

### 4.2 Driver Interviews

The review team interviewed 15 drivers: 6 from First Transit, 4 from MV Transit, and 5 from Veolia. Together, the drivers had an average of 4.5 years of service for LADOT. The interview form is presented in Attachment H.

When asked what types of stops require on-board stop announcements, eight drivers stated that they announce every stop. Seven drivers were able to identify the type of bus stops that they are required by their employer to announce: transfer points, time points, and/or major intersections. While time points are not specifically mentioned in the DOT ADA regulations, such time points usually correspond to major intersections or destinations at which stop announcements are required. None of the drivers stated that ADA requires them to announce stops at sufficient intervals for passengers to orient themselves. Some drivers mentioned that they would frequently announce stops if they judged that a passenger on the bus was a person who had low vision. Limiting stop and orientation announcements in this manner could potentially exclude some customers with disabilities. Furthermore, stop and orientation announcements are intended to provide access for people with other types of disabilities, not just people with vision disabilities and blindness. These announcements are required regardless of whether or not the disabilities of riders are evident.

While nine drivers said that the contractor provides lists of all stops on each route, these lists do not identify the stops where they should make announcements. Six drivers said they were not

told when or where to announce stops. If passengers ask about the location of a stop or request a particular stop, all drivers said that they announce the stop.

All but one driver explained that the buses have PA systems, but they prefer making unamplified announcements. All but two drivers said that they check the PA systems during pre-trip inspections, and that they note malfunctioning PAs in the Driver Vehicle Report, which informs the Maintenance Department of the need for repairs. Two of the drivers who were interviewed regularly operate buses with automated internal stop announcements, and they appreciate them greatly.

### 4.3 Review Team Observations

On April 19–21, 2010, the review team conducted on-board observations of the stop announcements, recording the bus number; the place along the route that announcements should be made (in advance of the stop); whether the announcement was made via the PA system, AVA, or voice; and whether each announcement was audible. The 3 reviewers rode 64 different route segments in all parts of the service area. A route segment may include all or part of a bus route (in one direction); these observations included routes from all nine contractor packages. The review team made 11 observations on 6 different Commuter Express routes and 53 observations on 37 different DASH and shuttle routes. Staff from the FTA Los Angeles Metropolitan Office made additional observations. The On-Board Stop Announcements Assessment Form used to record observations is presented in Attachment I, and the results are presented in Attachment J.

Observers boarded as early as 6:36 AM and as late as 5:40 PM and performed both peak and off-peak observations. Reviewers observed route segments for nearly 21 hours and averaged approximately 19 minutes per route segment.

The observers noted all stops that were announced and whether the announcement was clearly audible from the observer's position in the middle of the bus. Using the maps printed on the LADOT schedules, observers also listed stops that, in their judgment, should have been called but were not, including all stop announcements that the DOT ADA regulations require (transfer points, major intersections, major destinations, and orientation announcements). For the majority of route segments observed, either all or nearly all stops were announced, or none were announced.

Table 4.1 presents the results of the observations. The given percentages treat each route segment as one observation.

**Table 4.1 – Observed On-Board Stop Announcement Performance**

Route Type	Observations	Rate of Observations Made				
		<i>None</i>	<i>&lt;66.7%</i>	<i>66.7–80%</i>	<i>80–99%</i>	<i>100%</i>
DASH	53	26	15	1	2	9
Commuter Express	11	4	4	0	0	3
<b>Total</b>	<b>64</b>	<b>30</b>	<b>19</b>	<b>1</b>	<b>2</b>	<b>12</b>
<b>Percent</b>	<b>100%</b>	<b>46.9%</b>	<b>29.7%</b>	<b>1.6%</b>	<b>3.1%</b>	<b>18.8%</b>

The observations showed that LADOT achieved an 80 percent rate of announcing stops on only 14 segments (22%). All stops were announced on just 12 of the observed route segments; for 4 of these 12 segments, announcements were made by AVA. At the other end of the spectrum, on 49 of the observed route segments (77%), less than two-thirds of the announcements were made,

and in 30 of these 49 observations, no announcement was made. In 5 of these 49 segments, the driver asked the observer what stop he wanted, and the driver announced only this stop. This suggests that the driver might announce a stop if requested by a person with a disability as required by Section 37.167(b)(2), but that does not address the fact that no other stops were announced.

On Commuter Express routes, 3 of 11 segments (27%) had at least 80 percent of stop announcements made.

On DASH routes, 11 of 53 segments (21%) had at least 80 percent of stop announcements made.

Table 4.2 summarizes the method of making the observed announcements. A total of 206 announcements were observed on 34 different route segments on which at least one stop announcement was made. Of this total, 125 announcements (60%) were made by unamplified voice, including all 42 of the announcements observed on Commuter Express routes. For DASH routes, there were 164 observed announcements; 51 percent of these were made by unamplified voice, 24 percent by the driver using the PA system, and 25 percent by automatic announcements.

**Table 4.2 – Announcement Method**

Route Type	Total	By Driver (Voice)		By Driver (PA)		Automated	
		Num.	Pct.	Num.	Pct.	Num.	Pct.
DASH	164	83	51%	40	24%	41	25%
Commuter Express	42	42	100%	0	0%	0	0%
<b>Total</b>	<b>206</b>	<b>125</b>	<b>60%</b>	<b>40</b>	<b>20%</b>	<b>41</b>	<b>20%</b>

Table 4.3 summarizes the audibility of the observed announcements. Overall, 87 percent of the announcements were judged to be clearly audible, 3 percent were of mixed audibility, and 10 percent were inaudible. Calls were judged to be of mixed audibility if, in the opinion of the observer, a person familiar with the local street names could interpret the announcement. All of the announcements made by PA or AVA were clearly audible from the observer's position in the bus. The inaudible announcements on both DASH and Commuter Express routes were all made by voice, and, in some instances, the observer was aware that the announcement was being made only because he could see the driver's reflection in the driver's mirror; there may have been additional instances in which the inaudibility of the announcement led the observer to believe that no announcement had been made.

**Table 4.3 – Audibility of On-Board Stop Announcements**

Route Type	Total	Inaudible		Mixed Audibility		Audible	
		Num.	Pct.	Num.	Pct.	Num.	Pct.
DASH	164	20	12%	5	3%	139	85%
Commuter Express	42	1	2%	1	2%	40	95%
<b>Total</b>	<b>206</b>	<b>21</b>	<b>10%</b>	<b>6</b>	<b>3%</b>	<b>179</b>	<b>87%</b>

Although all of the observed announcements on Commuter Express routes were made by voice rather than by PA, they were generally audible to the observer. On the DASH routes, 25 of the 83 announcements (30%) made by voice were inaudible or of mixed audibility.

## 4.4 Findings

1. Many of the drivers that the review team interviewed were not able to list the types of stops that are required to be announced, although many of them said they announce all stops. None of the drivers stated that ADA requires them to announce stops at sufficient intervals for passengers to orient themselves. Some drivers mentioned that they would frequently announce stops if they judged that a passenger on the bus was a person who had low vision. Limiting stop and orientation announcements in this manner could potentially exclude some customers with disabilities. Furthermore, stop and orientation announcements are intended to provide access for people with other types of disabilities, not just people with vision disabilities and blindness. Section 37.173 requires operators to be trained to proficiency in meeting all ADA requirements, including Section 37.167(b). LADOT must establish standards for contractor performance on stop announcements, communicate those standards to contractors, and monitor contractor performance to ensure that contractors are performing to LADOT's standards.
2. Of the 64 route segments observed by the review team, LADOT made at least 80 percent of the stop announcements for only 14 segments (22%). All stops (i.e., 100%) were announced on only 12 of the observed route segments. On 30 of the 64 route segments observed by the review team, no stops were announced. On another five route segments, the driver announced a single stop, prompted by a review team member's request. This performance indicates inadequate compliance by contractors with Section 37.167(b), which requires announcement of stops to passengers on transit vehicles. LADOT must establish standards for contractor performance on stop announcements and orientation announcements, communicate those standards to contractors, and monitor contractor performance to ensure that contractors are performing to LADOT's standards.
3. Stop announcement performance was slightly better on Commuter Express routes than on DASH routes. At least 80 percent of stop announcements were made on 27 percent of the Commuter Express route segments observed. At least 80 percent of stop announcements were made on 21 percent of the DASH route segments observed. LADOT must establish standards for contractor stop announcements and orientation announcements, communicate those standards to contractors, and monitor contractor performance to ensure that are performing to LADOT's standards.
4. On DASH routes, approximately 30 percent of the observed announcements made without the PA were judged to be inaudible. All announcements made by AVA or PA were judged to be audible. Several interviewed drivers said they preferred not to use the PA system. These findings indicate inadequate compliance with Section 37.167 (b), which requires announcement of stops to passengers on transit vehicles. LADOT must establish standards for contractor performance with respect to the audibility of stop announcements and orientation announcements, communicate those standards to contractors, and monitor contractor performance to ensure that contractors are performing to LADOT's standards.

## 4.5 Recommendations

The following are recommendations for LADOT's use to address the findings in the previous section:

1. Direct contractors to ensure that all drivers review stop lists and receive refresher training on the types of stops that must be announced, making orientation announcements, and the need for a means of external route identification.
2. Direct contractors to use disciplinary systems to achieve compliance.
3. Increase monitoring performance regarding required stop and orientation announcements. Ensure that contractors make the required announcements through monitoring, discipline, and refresher training. Direct contractors to require drivers to use the PA system. Direct Road Supervisors to monitor performance of required announcements and their audibility and report their observations to LADOT in the Weekly ADA Compliance Reports.

## 5 Vehicle/Route Identification Performance

Section 37.167(c) of the DOT ADA regulations states:

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 driver as a person seeking a ride on a particular route.

This chapter addresses LADOT's efforts to identify bus routes to customers waiting at stops shared by more than one route, including:

- Summary of consumer comments from telephone interviews
- Summary of driver comments from review team interviews
- Description of the review team's method for reviewing route identification efforts
- Summary of information collected and observations made regarding route identification

### 5.1 Consumer Comments

As mentioned in Chapter 2, all four interviewed riders commented that drivers never identify the bus route or destination, even at transfer points, unless requested by passengers. Each interviewee stated that LADOT buses were not equipped with external speakers. DASH buses have external speakers, but they may not be perceptible to riders if not frequently used.

There were no complaints filed with LADOT in the 12 months prior to the review regarding route identification announcements.

### 5.2 Driver Interviews

At the at the time of the on-site review, LADOT had elected to use external route identification announcements as its means of route identification at all stops served by more than one bus route, but it had not implemented these announcements. None of the 15 interviewed drivers had operated a bus equipped with automated external announcement equipment. All drivers reported that they make oral external announcements if they suspect that a passenger at the stop cannot read the headboard or seems otherwise confused. Limiting external route identification announcements in this manner could potentially exclude some customers with disabilities. Furthermore, external route announcements provide access for people with other types of disabilities, not just people with vision disabilities and blindness, at all stops serving multiple routes. An effective means of route identification is required under Section 37.167(c) of the DOT ADA regulations, regardless of whether or not the disabilities of the waiting patrons are evident.

None of the drivers appeared to be familiar with the need for route identification.

### 5.3 Review Team Observations

The review team conducted 83 observations of external route identification announcements using the Route Identification Announcements Assessment Form presented in Attachment K. Three of these observations were made at bus stops outside Downtown Los Angeles; 80 of the observations were made at Downtown stops where many routes converge and the stops serve multiple routes (e.g., 5th Street at Flower Street, and 7th Street at Figueroa Avenue). These

observations took place on April 19–21, 2010, during morning and/or evening peak periods. Each LADOT bus arriving at the stop where a reviewer was stationed was documented and counted as a single observation.

No route identification announcement was made by any of the LADOT buses during these observations.

Attachment L presents the full set of route identification announcement data.

## 5.4 Findings

1. At the at the time of the on-site review, LADOT had elected to use external route identification announcements as its means of route identification at all stops served by more than one bus route, but it had not implemented these announcements. Section 37.167(c) of the DOT ADA regulations requires the transit entity to 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. LADOT must implement an effective means of route identification and ensure that the means is communicated to all fixed route riders including visitors. This includes compliance with Section 37.161(a) with regard to maintaining external speakers on buses that have them, and using training, monitoring, and discipline to achieve compliance. Section 37.161(b) also requires that when an accessibility feature such as an external speaker is out of order, reasonable steps, such as making audible announcements by voice, must be taken to accommodate individuals with disabilities. Alternatively, LADOT may elect to institute another method to comply with the regulation (such as colored mitts or numbered cards described in Appendix D to the regulation) and establish, communicate, and monitor contractor compliance with standards to implement this method.
2. All drivers reported that they make verbal external announcements if they suspect that a passenger at the stop cannot read the headboard or seems otherwise confused. Limiting external route identification announcements in this manner could potentially exclude some customers with other types of disabilities, not just people with vision disabilities and blindness, at all stops serving multiple routes. Section 37.167(c) requires an effective means of route identification or means of identifying to the vehicle operator that a person seeks a ride on a particular route, regardless of whether or not the disabilities of the waiting patrons are evident. LADOT must establish standards for contractor performance on route identification announcements, communicate those standards to contractors, and monitor contractor performance to ensure that contractors are performing to LADOT's standards. LADOT may elect to institute another method to comply with the regulation (such as colored mitts or numbered cards described in Appendix D to the regulation), and establish, communicate, and monitor contractor compliance with standards to implement this method.
3. Review team members observed 83 buses at stops served by more than one route and heard no route identification announcements. LADOT must require contractors to train, monitor, and discipline their drivers to achieve compliance with LADOT's standards for meeting the requirements of Section 37.167(c).

## 5.5 Recommendations

The following are recommendations for LADOT's use to address the findings in the previous section:

1. Ensure that LADOT drivers and contractor drivers understand the requirement for an effective means of route identification. Consider implementing external route identification announcements as the effective means at all stops served by more than one bus route. Consultation with the disability community is recommended.
2. Work with contractors to ensure that the means of route identification is implemented and effective through refresher training, monitoring, and discipline of drivers and consultation with the disability community. If external route announcements are selected as the effective means, then monitor performance of route identification announcements. These announcements should be incorporated into LADOT's road inspections and bi-weekly contractor meetings.



## **Attachment A**

### **FTA Notification Letter**



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

Headquarters

East Building, 5<sup>th</sup> Floor - TCR  
1200 New Jersey Ave., SE  
Washington, D.C. 20590

January 22, 2009

James Lefton  
Chief of Transit - Los Angeles Department of Transportation  
10<sup>th</sup> Floor  
100 Main St.  
Los Angeles, CA 90012

Dear Mr. Lefton:

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, and 38, 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. Los Angeles Department of Transportation (LA DOT) has been selected for such a review.

The focus of the review will be LA DOT's compliance with 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 overall review process will consist of the collection of data prior to the visit, an on-site review of LA DOT'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 four days. FTA has engaged the services of Planners Collaborative, Inc. (PCI) of Boston, MA with TranSystems, Corp. of Medford, MA, to conduct the compliance review. Representatives of PCI and FTA will participate in the exit conference. The on-site visit will take place between June 1, 2010 and the next 120 days, although we do not provide the actual date ahead of time because of the nature of the observation.

The dates for this review have been moved at the request of LA DOT due to potential changes in its contracted service providers, and in light of other FTA reviews that are occurring in the same time period. We are providing very early notification of the upcoming review and would

therefore appreciate it if LA DOT would keep us informed of relevant changes to service, such as changes to route schedules, that occur between now and the end of the review period.

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 120 calendar days of the date of this letter. These materials should be forwarded to:

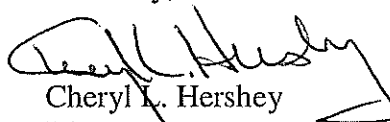
David Chia  
Planners Collaborative, Inc.  
122 South Street  
Boston MA 02111  
617-338-0018 x17  
617-338-4228 fax  
*dc@thecollaborative.com*

We also request that you identify a LA DOT staff contact to coordinate our activities before, during, and after the on-site review. 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 including 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. When the report is final, it will be a public document and subject to the Freedom of Information Act upon request.

We welcome your suggestions and encourage your participation as we prepare for the review by asking questions or commenting on any issues you may feel are relevant. If you have any questions or concerns prior to the site visit, please contact Jonathan Klein, FTA Equal Opportunity Specialist, at 202-366-0809 or at his e-mail address: *jonathan.klein@dot.gov*. You may also contact David Chia, of PCI, whose contact information is above.

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

Sincerely,



Cheryl L. Hershey  
Director  
FTA Office of Civil Rights

Enclosure

cc: Leslie Rogers, FTA Region IX Administrator  
Derrin Jourdan, FTA Region IX Civil Rights Officer  
Ray Tellis, FTA Los Angeles Metropolitan Office  
David Chia, PCI

**Enclosure**

We request that the following information be submitted to Planners Collaborative Inc. **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 current detailed route schedules.
3. Identification of which routes are operated directly by LA DOT and which are operated by a private contractor.
4. Identification of transfer points and locations where different routes share a common line: paper copy as well as electronic format, if available.
5. Current Fixed Route Operator Manual/s, notices, bulletins, memoranda, or other documentation informing vehicle operators of stop announcement and vehicle/passenger identification policies.
6. Current roster of fixed route bus fleet including: make, model year, number of internal speakers, number of external speakers, type of public address system, and (if any) type of automated announcement system: paper copy as well as electronic format, if available.
7. Reports, memoranda, or other documentation regarding stop announcement monitoring activities and findings.
8. A list of complaints related to stop announcements in the past year. The list should include customer's name, trip origin, date and type of complaint, carrier, and resolution (any corrective actions requested and taken).

## **Attachment B**

### **Site Visit Schedule**

**Review of ADA Stop Announcements**  
**Los Angeles Department of Transportation (LADOT), Los Angeles, CA**  
**April 19-23, 2010**  
**On-Site Schedule**

<b>Time</b>	<b>Activity</b>	<b>Who</b>	<b>Where</b>
<b>Monday, April 19, 2010</b>			
All Day	<ul style="list-style-type: none"> <li>➤ Ride selected routes and record stop announcements</li> <li>➤ Check for Route IDs at transfer points</li> </ul>	Review Team, plus Jonathan Klein, FTA	On LADOT buses
<b>Tuesday, April 20, 2010</b>			
All Day	<ul style="list-style-type: none"> <li>➤ Ride selected routes and check for Route IDs at transfer points</li> </ul>	Review Team, plus Jonathan Klein, FTA	On LADOT buses
Morning	<ul style="list-style-type: none"> <li>➤ Call LADOT to arrange meetings on Wednesday and Friday.</li> </ul>	Purdy	
<b>Wednesday, April 21, 2010</b>			
Early/late	<ul style="list-style-type: none"> <li>➤ Catch additional LADOT Commuter lines</li> </ul>	all	On LADOT buses
9:00 AM	<ul style="list-style-type: none"> <li>➤ Opening conf with LADOT</li> </ul>	Review Team, FTA	LADOT offices
9:30 AM	<ul style="list-style-type: none"> <li>➤ Review policies and procedures for stop announcements and route identification</li> <li>➤ Review LADOT practices for monitoring driver practices</li> </ul>	Purdy, Hersey  Procopio	LADOT offices
10:00	<ul style="list-style-type: none"> <li>➤ Meet with manager of contractor services</li> </ul>	Review Team	LADOT offices
10:30 AM	<ul style="list-style-type: none"> <li>➤ Meet with customer service manager to discuss complaint system</li> </ul>	Review Team	LADOT offices
12:00 PM	<ul style="list-style-type: none"> <li>➤ Travel to First Transit garage</li> <li>➤ Conduct driver interviews at two locations</li> <li>➤ Interview Training Manager and Ops Super</li> <li>➤ Meet with vehicle maintenance manager and review files.</li> </ul>	Hersey, Procopio   Purdy	First Transit garage

<b>Thursday, April 22, 2010</b>			
Early/late	➤ Catch additional LADOT Commuter lines	all	On LADOT buses
	Travel to Veolia and MV garages: ➤ Conduct additional driver interviews at three locations ➤ Interview maintenance managers/review files ➤ Interview Training Managers and Ops Supers ➤ Team meeting to tabulate observations and prepare for exit conference	Review Team	Veolia Garages  MV Garages
<b>Friday, April 23, 2010</b>			
Morning	➤ Review team meeting to tabulate observations and prepare for exit conference	Review Team	Metro HQ offices
2:00 PM	➤ Exit Conference	Review Team, plus Jonathan Klein and FTA/OCR	Metro HQ offices

### **Review Team**

Jim Purdy, Planners Collaborative, Team Leader

617.791.3537

[jpurdy02464@gmail.com](mailto:jpurdy02464@gmail.com)

[jpurdy@thecollaborative.com](mailto:jpurdy@thecollaborative.com)

John Hersey, Planners Collaborative, Reviewer

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Tom Procopio, TranSystems, Reviewer

t (857) 453-5530

c 339-221-3890

[tprocopio@transystems.com](mailto:tprocopio@transystems.com)

## **Attachment C**

### **LADOT Response to Draft Report**



## **Furrer, Jeremy (FTA)**

---

**From:** James Lefton <james.lefton@lacity.org>  
**Sent:** Wednesday, March 05, 2014 5:43 PM  
**To:** Furrer, Jeremy (FTA)  
**Cc:** Day, John (FTA); Jourdan, Derrin (FTA); Corinne Ralph; Kari Derderian; Martha D'Andrea; Brian Lee; Yanna Loewy; Michael Pascual; Phil Aker  
**Subject:** LADOT ADA Stops Review Report - Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mr. Furrer,

Thank you for the opportunity for the City of Los Angeles Department of Transportation (LADOT) to comment on the preliminary final Route Identification and Stop Announcements Review report. We do not have any corrections to material statements of fact at this time. We would like to update you on several of the findings in the report, as discussed below.

### **Update to Findings, Section 3.7**

1. Finding #1 - LADOT added new contract language in its most recent requests for proposals (RFPs), released in late 2010 and 2012, and contracts providing additional information regarding ADA requirements. We will modify this contract language, as necessary, to ensure that all contract sections requiring ADA compliance enumerate the applicable sections of the regulations.
2. Finding #2 - LADOT's most recent RFPs have included uniform penalties for both DASH and Commuter Express services covering all ADA related requirements including stop announcements.
3. Finding #3 - LADOT's most recent RFPs included a \$500 penalty for any incident involving an ADA violation. The compliance standard is 100%. LADOT will incorporate specific penalties for ADA route identification announcements in its RFPs and contracts.
4. Finding #7 - LADOT has implemented the use of the Service Monitor Ridecheck View in TransTrack for project managers to enter the results of their field inspections (including all ADA related inspections and deficiencies) into TransTrack. The Project Managers have been trained to use the system and are currently entering their field inspection results into TransTrack.
5. Finding #11 - LADOT replaced all of its older Commuter Express buses in 2012 with new coaches from MCI (95 total). All DASH and Commuter Express buses are now equipped with a PA system with internal and external speakers. LADOT has also ensured that the PA system is being properly maintained by our contractors.

Thanks.

Jim

--

James Lefton

Executive Officer, Transit Services  
LADOT  
100 South Main Street, 10th Floor  
Los Angeles CA 90012  
[\(213\) 972-8408](tel:(213)972-8408)  
[james.lefton@lacity.org](mailto:james.lefton@lacity.org)

## **Attachment D**

### **Customer Interview Form**

## Agency/Customer Contact Form (Fixed Route Stop Announcements)

Agency Name: LADOT

Contact Person Name: \_\_\_\_\_

Contact Person Title: \_\_\_\_\_

Contact Person Phone Number: \_\_\_\_\_ Date of Contact: \_\_\_\_\_

Summarize person's input regarding on-board stop announcements: \_\_\_\_\_

---

---

---

Summarize person's input regarding vehicle and passenger 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 be sent).

---

---

---

Recommended review follow-up: \_\_\_\_\_

---

---

\_\_\_\_\_  
Signature of Person Completing this Form

\_\_\_\_\_  
Print Name

## **Attachment E**

### **LADOT Customer Complaint Card**

Please drop into a mailbox. Include your name, address and phone number. / Deposite en un buzón. Incluya su nombre, dirección y número de teléfono.

Name / Nombre \_\_\_\_\_

Phone / Número de teléfono \_\_\_\_\_

Address / Dirección \_\_\_\_\_

\_\_\_\_\_

Email / Correo electrónico \_\_\_\_\_

Date of Incident / Fecha del incidente \_\_\_\_\_

Time of Day / Hora del día \_\_\_\_\_

DASH Route Name / Nombre de la Ruta de DASH \_\_\_\_\_

Commuter Express Route / Ruta # \_\_\_\_\_

Other Service / Otro servicio \_\_\_\_\_

Direction / Dirección \_\_\_\_\_

Driver's Name / Nombre del conductor \_\_\_\_\_

\_\_\_\_\_

Bus Number / Número de autobús \_\_\_\_\_

Stop Location (nearest intersection) / Ubicación de la

parada (intersección más cercana) \_\_\_\_\_

How would you like us to contact you regarding your comments? / ¿Cómo desearía que nos comuniquemos con usted con respecto a sus comentarios?

- ☐ Written response / Respuesta escrita  
☐ Telephone / Teléfono  
☐ Email / Correo electrónico  
☐ No response necessary / No es necesaria una respuesta

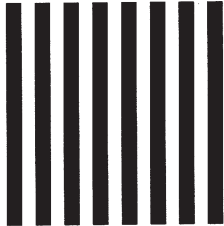
thank you

LADOT

place tape here to seal /  
coloque la cinta aquí para sellar



NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES



BUSINESS REPLY MAIL

FIRST-CLASS MAIL PERMIT NO. 46544 LOS ANGELES CA 90012

POSTAGE WILL BE PAID BY ADDRESSEE

LADOT TRANSIT STORE  
201 N LOS ANGELES ST STE 18B  
LOS ANGELES CA 90099-9171



díganos  
LO QUE  
piensa

tell us what  
YOU  
think



LADOT  
City of Los Angeles  
Department of Transportation

# Commendations or Complaints

## Felicitaciones o quejas

The City of Los Angeles Department of Transportation (LADOT) is committed to offering our riders the best possible service. To help us achieve that goal, we need to hear from you about how well we are doing. If there is something you would like us to know, please use this card. / El Departamento de Transporte de la ciudad de Los Angeles (LADOT) está dedicado a ofrecer el mejor servicio posible a nuestros pasajeros. Para ayudarnos alcanzar nuestra meta, queremos saber su opinión acerca de la calidad de servicio que ofrecemos. Si hay algo en particular que Ud. desee decirnos, use esta tarjeta.

### Driver/Bus Service Performance / Desempeño del servicio del conductor / autobús

- ☐ Courteous bus driver / Conductor amable
- ☐ Rude bus driver / Conductor descortés
- ☐ Bus On Time / Autobús a tiempo
- ☐ Bus late / Autobús retrasado
- ☐ Bus early / Autobús con adelanto
- ☐ Bus did not stop for me / El autobús no se detuvo para recogerme
- ☐ Bus did not show up / El autobús no llegó
- ☐ Two or more buses stop at same time / Dos o más autobuses se detienen a la misma hora
- ☐ Did not call out stop / No anunció la parada
- ☐ Other / Otros

### Driver Driving Skills / Habilidades de manejo del conductor

- ☐ Excellent / Excelentes
- ☐ Good / Buenas
- ☐ Fair / Regulares
- ☐ Changes lanes illegally / Cambia de carril ilegalmente
- ☐ Drives too slow / Maneja muy lentamente
- ☐ Drives too fast / Maneja muy rápidamente
- ☐ Tailgates / Se acerca demasiado al auto de adelante
- ☐ Does not use signals / No utiliza señales
- ☐ Unsafe turning / Da giros peligrosos
- ☐ Other / Otros

### Vehicle Condition / Condición del vehículo

- ☐ Heating is comfortable / La calefacción es cómoda
- ☐ Air conditioning is comfortable / El aire acondicionado es cómodo
- ☐ Too cold - no heat / Muy frío - no hay calefacción
- ☐ Too hot - no air conditioning / Muy caliente - no hay aire acondicionado
- ☐ Bus broke down / El autobús se dañó
- ☐ Wheel chair lift broken / El elevador para sillas de ruedas está dañado
- ☐ Other / Otros

### Bus Cleanliness / Limpieza del autobús

- ☐ Bus is clean on exterior / El autobús está limpio en el exterior
- ☐ Bus is clean on interior / El autobús está limpio en el interior
- ☐ Bus is dirty or damaged on exterior / El autobús está sucio o dañado en el exterior
- ☐ Bus is dirty or damaged on interior / El autobús está sucio o dañado en el interior

### Fare concerns / Preocupaciones respecto al precio de los pasajes

- ☐ Fare is a good value / El pasaje tiene un buen precio
- ☐ Overcharged / Cobrado en demasía
- ☐ Fare dispute / Disputa de precio de un pasaje
- ☐ Other / Otros

### Service information concerns / Preocupaciones sobre la información del servicio

- ☐ Schedules and other materials provided / Se proveen horarios y otros materiales
- ☐ Brochures easy to understand / Los folletos son fáciles de entender
- ☐ Signs easy to understand / Los senales son fáciles de entender
- ☐ No schedules on bus / No hay horarios en el autobús
- ☐ No bus stop signs / No hay paradas de autobús
- ☐ No Pass Order forms / No hay formularios para órdenes de pases
- ☐ No Rider Alerts/Notices of Changes / No hay alertas/avisos de cambios para los pasajeros
- ☐ No comment cards provided / No se provee tarjetas para comentario
- ☐ Other / Otros

### Is there anything else you'd like to tell us? / ¿Quisiera decirnos algo más?



**Attachment F**

**LADOT Bi-Weekly Contractor Meeting Agenda  
and  
Contractor ADA Weekly Compliance Report**



Rita Robinson  
GENERAL MANAGER

City of Los Angeles  
CALIFORNIA



ANTONIO R. VILLARAIGOSA  
MAYOR

DEPARTMENT OF  
TRANSPORTATION  
221 N. FIGUEROA ST., SUITE 400  
LOS ANGELES, CA 90012  
(213) 580-5443  
FAX (213) 580-5458

**BI-WEEKLY MEETING OF LADOT & MV TRANSPORTATION, INC.  
DASH PACKAGES 1 & 2**

Thursday, February 5, 2009  
LADOT, 100 S. Main St., Los Angeles, CA 90012  
Pacific Palisades Conference Room

**AGENDA**

1. Signing-in at 10:00 a.m.
2. Approval of Minutes
3. General Manager's Statement/Concerns
4. Maintenance
  - 4.1. Review of Hold List
  - 4.2. Update hybrid bus # 99002
  - 4.3. Update on 25 lbs. fire suppression equipment (if any)
  - 4.4. Mechanics list with attained level of certification
  - 4.5. Destination Signs / Monitoring Worksheet
  - 4.6. Other maintenance issues
5. Operations
  - 5.1. Customer Complaints
  - 5.2. Missed revenue hours, missed trips and road calls
  - 5.3. ADA Compliance Audit
  - 5.4. TransTrack Data Input
  - 5.5. Field Checks
6. Staff Training and Safety, Number of Drivers
7. Other
8. The next meeting date will be February 19, 2009.

**PACKAGE 5A**  
**ADA COMPLIANCE WEEKLY REPORT**

Report Date: 4/19/2010

Dates covered by report:

Route: CSQ

DATES	TYPES AND NUMBER OF DRIVER NON COMPLIANCE OBSERVED			REMARKS
	STOP ANNOUNCEMENT	TRANSFER ANNOUNCEMENT	WHEEL CHAIR OPERATION	
Monday,				
Tuesday				
Wednesday,				
Thursday	OK	OK	OK	APPLON, K., 2069
Friday,	OK	OK	OK	RODRIGUEZ, 2044
Saturday,				
Sunday,				
<b>WEEKLY TOTAL</b>				

*Note: This Weekly Report of ADA compliance is a summary of the Daily ADA compliance audit done during the week.*

*This weekly report is submitted to the LADOT Project Manager every Monday morning by 10:00.*

*The Remarks column will be used to indicate any measures taken to remedy any of the problems indicated.*

Reviewed and signed by the GM:

Tina Trisby

Date:

4/19/2010

[illegible]

## **Attachment G**

### **Monitoring Forms Used by Contractors**

## RIDE ALONG CHECKLIST

Date: \_\_\_\_\_ Driver: \_\_\_\_\_ Route: \_\_\_\_\_ Bus: \_\_\_\_\_ Time: \_\_\_\_\_

	Satisfactory	Unsatisfactory	Supervisor comments
Destination signs working properly			
Schedules on bus			
Commendation/Complaint cards			
Personal appearance			
Seat belt			
Bus cleanliness inside			
Courtesy to passengers			
Willing to talke and follow instructions			
Call all stops properly			
Stops at all bus stops			
Stops/starts smoothly			
Adjusts speed to traffic conditions			
Proper use of signals			
Correct stops at railroad crossing			
Observes traffic			

Supervisor: \_\_\_\_\_

Reviewed with driver on: \_\_\_\_\_

Signature of driver: \_\_\_\_\_

Signature of reviewer: \_\_\_\_\_

# Operator Evaluation Form



**VEOLIA**  
TRANSPORTATION

START TIME: \_\_\_\_\_ END TIME: \_\_\_\_\_

OPERATOR: \_\_\_\_\_ DATE: \_\_\_\_\_

BUS NUMBER: \_\_\_\_\_ EVALUATOR: \_\_\_\_\_ LOCATION: \_\_\_\_\_

TYPE: ☐ BTW Training ☐ Bi Annual ☐ Trail Check ☐ Post Accident ☐ Return LOA ☐ Re-Hire ☐ Final Evaluation

ROUTE DRIVEN: \_\_\_\_\_ VEHICLE TYPE: \_\_\_\_\_ Lift \_\_\_\_\_

BRAKE TYPE: ☐ Air Brake ☐ Hydraulic Brake PROPER MIRROR POSITION Yes \_\_\_\_\_ No \_\_\_\_\_

## Driving Evaluation

✓ = Meets Expectations

O = Needs Improvement

N/A = Not applicable

	✓	O	N/A
<b>Pre-Trip Inspection</b>			
Completes appropriate brake test			
Completes outside pre-trip			
Completes inside pre-trip			
Completes pre-trip form			
<b>Preparing to Drive</b>			
Checks mirror adjustment			
Scans mirrors before moving			
Turns headlights on before departure			
Uses seat belt appropriately			
Adjusts driver's seat			
Re-checks gauges before departure			
<b>Passenger Management</b>			
Demonstrates passenger courtesy/assistance			
Deals with passenger inquiries effectively			
Assists passengers on board when necessary			
Monitors passenger safety			
<b>Radio Procedures</b>			
Proper pickup and drop notification			
Uses radio appropriately			
Communicates effectively			
Follows established procedure			
<b>Defensive Driving</b>			
Aims high in steering			
Gets the big picture			
Keeps eyes moving to see all hazards			
Leaves an out by planning ahead			
Makes sure others see him / her			
Makes eye contact with other drivers			
Covers the brake when necessary			
Uses proper hand positions on steering wheel			
Has appropriate clearance on sides of bus			
Accelerates / brakes and reacts smoothly			
Uses signals appropriately			
Uses horn appropriately			
Obeys speed limit			
Maintains proper following distance			
Uses proper passing procedures			
Stays in appropriate lane for conditions			
Displays courtesy to other drivers and conditions			

	✓	O	N/A
<b>Backing Skills</b>			
Backs only when necessary			
Views path before backing			
Backs slowly using all mirrors			
Uses horn and hazards to warn others			
Backs no further than necessary			
Knows rear-end clearance to fixed objects			
Backs from driver's side when possible			
Uses proper steering in relation to rear wheels			
Uses backing weave where practical			
Follows all local backing requirements			
<b>Turning Skills</b>			
Approaches turn from proper lane			
Turns into proper lane			
Establishes proper lane position before turning			
Maintains clearance and performs square turns			
Uses appropriate speed when turning			
Uses reference points when turning			
Uses mirrors appropriately when turning			
<b>Intersections</b>			
Approaches intersections cautiously			
Covers brake when entering intersection			
Obeys all traffic controls			
Is aware of stale and fresh green lights			
Grants right of way to pedestrians and other vehicles			
Stops completely behind stop sign/stop line			
Does not start too soon after green light			
Scans intersections before moving			
Checks mirrors before moving			
<b>Braking</b>			
Brakes smoothly to stop (no rebound)			
Brakes early to avoid unnecessary wear			
Understands braking system of bus being used			
Is able to panic stop and use emergency stopping system			
Slows and covers brake at stale green light			
Uses steady, light application on hills, mountains and curves (does not "pump" brakes)			



	✓	O	N/A
<b>Passenger Pick Up / Drop Off</b>			
Uses all appropriate signals prior to stop			
Selects a safe position for stop			
All appropriate warning lights are on			
Proper position to curb at stop			
Monitors traffic at stop			
ADA Announcements made			
Uses door safely at stop			
Passenger safety is monitored			
Passenger / Traffic check performed			
Signals to move into traffic			
Merges smoothly into traffic			
<b>Railroad Crossing</b>			
Uses appropriate lane			
Uses appropriate warning lights			
Stops at appropriate distance (15 to 50 feet)			
Shuts off all noisy accessories			
Displays correct use of door and windows			
Asks passengers to be quiet			
Looks and listens in both directions for train			
Ensures clearance for vehicle after crossing tracks			
Uses lowest gear when crossing tracks			
Is aware of different types of tracks			
Re-enters traffic safely using appropriate signals			
<b>Wheelchair Procedures</b>			
Places wheelchair on lift properly			
Uses proper load / unload procedures			
Secures the chair properly			
Uses tie-downs and ramp covers properly			
Passenger lap and shoulder strap used			
Secures the vehicle when leaving seat (takes key)			
Understands emergency-manual lift operation			
Positions vehicle properly at loading zones			
<b>Engine / Transmission Skills</b>			
Uses appropriate gears			
Does not over rev engine			
Monitors idling time			
Monitors gauges while driving			
Comes to a complete stop before changing from reverse to forward and vice versa			
Downshifts when needed / appropriate			

	✓	O	N/A
<b>Hill and Mountain Driving</b>			
Maintains proper speed for conditions			
Maintains proper following distance for conditions			
Appropriate gear selection for up and down grades			
Curbs tires appropriately			
Uses proper lane			
Uses caution on hills, curves and no passing zones			
Uses proper chain procedures when applicable			
Avoids roll back on hills			
Mountain certified drivers must demonstrate ability to install, remove, and stow chains			
<b>Post -Trip Inspection</b>			
Does inside / outside post trip			
Secures the vehicle			
Completes all paperwork			
<b>Professionalism and Appearance</b>			
Carries appropriate license / certificate			
Carries company identification			
Dresses in accordance with company policy			
Wears appropriate footwear			
Personal hygiene acceptable			
Maintains vehicle cleanliness			

<b>Overall Operator Performance Evaluation</b>
Overall Evaluation: <input type="checkbox"/> Meets Expectations <input type="checkbox"/> Needs Improvement
Specific Areas of Concern: _____
_____
_____
_____
Corrective Action: _____
_____
_____
_____
Evaluator's General Comments: _____
_____
_____
_____
_____

I certify that this evaluation has been discussed with me. I understand my signature does not necessarily indicate agreement with the content of the evaluation. Operator Signature \_\_\_\_\_ Date: \_\_\_\_\_

Recommended Training Plan Activity	Time Required	Scheduled Date	Completed Date
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

GM Signature \_\_\_\_\_ Date Reviewed \_\_\_\_\_





## Driver Skills Evaluation and Refresher Training Form

<b>Driver Name (print):</b>		<b>Employee Number:</b>		<b>Start Time:</b>		<b>Date of Accident/Incident:</b>	
				<b>Stop Time:</b>			
<b>Reason for Refresher (Check one)</b>	<b>Post Accident</b>	<b>Road Check</b>	<b>Division Name &amp; Div. #</b>			<b>Date of Refresher:</b>	
	<b>Return to Work</b>	<b>45/90 Day Follow up (New Hires)</b>				<b>Instructor Name (print):</b>	
	<b>Drive Cam</b>	<b>Other:</b>					
<b>Driver License #</b>		<b>CDL (Y/N)</b>		<b>Class</b>		<b>State</b>	
						<b>Expiration Date</b>	
<b>D.O.T. Medical Card Exp. Date</b>				<b>Vehicle / Bus Type &amp; Model</b>			

S = Satisfactory    U = Unsatisfactory    N/A = Strike through boxes

Pre-Trip/Post	S	U	Intersections	S	U	Backing	S	U	Get The Big Picture	S	U
DVI	<input type="checkbox"/>	<input type="checkbox"/>	Mirror Use	<input type="checkbox"/>	<input type="checkbox"/>	Mirror Use	<input type="checkbox"/>	<input type="checkbox"/>	Observes Speed Limit	<input type="checkbox"/>	<input type="checkbox"/>
Interior	<input type="checkbox"/>	<input type="checkbox"/>	Turn Signal Use	<input type="checkbox"/>	<input type="checkbox"/>	Activate 4-Way Flasher	<input type="checkbox"/>	<input type="checkbox"/>	Speed for Conditions	<input type="checkbox"/>	<input type="checkbox"/>
Brake Check	<input type="checkbox"/>	<input type="checkbox"/>	Approach/Lane Position	<input type="checkbox"/>	<input type="checkbox"/>	Use Horn - 2 X Prior	<input type="checkbox"/>	<input type="checkbox"/>	Takes in Whole Scene	<input type="checkbox"/>	<input type="checkbox"/>
Exterior	<input type="checkbox"/>	<input type="checkbox"/>	Speed on Approach	<input type="checkbox"/>	<input type="checkbox"/>	Utilizes Assistance	<input type="checkbox"/>	<input type="checkbox"/>	Aware of Hazards	<input type="checkbox"/>	<input type="checkbox"/>
Emergency Equipment	<input type="checkbox"/>	<input type="checkbox"/>	Blocks Turns	<input type="checkbox"/>	<input type="checkbox"/>	Checks for Obstacles/	<input type="checkbox"/>	<input type="checkbox"/>	Obeys Signs/Signals	<input type="checkbox"/>	<input type="checkbox"/>
Mirrors/Glass	<input type="checkbox"/>	<input type="checkbox"/>	Pedestrian Awareness	<input type="checkbox"/>	<input type="checkbox"/>	Walk Around	<input type="checkbox"/>	<input type="checkbox"/>	Yields Right of Way/Ped.	<input type="checkbox"/>	<input type="checkbox"/>
Lights	<input type="checkbox"/>	<input type="checkbox"/>	Left Turns	<input type="checkbox"/>	<input type="checkbox"/>	Backs Only When	<input type="checkbox"/>	<input type="checkbox"/>	Checks Mirrors Prior and	<input type="checkbox"/>	<input type="checkbox"/>
Gauges / Horn	<input type="checkbox"/>	<input type="checkbox"/>	Right Turns	<input type="checkbox"/>	<input type="checkbox"/>	Necessary	<input type="checkbox"/>	<input type="checkbox"/>	After	<input type="checkbox"/>	<input type="checkbox"/>
Tires	<input type="checkbox"/>	<input type="checkbox"/>	Mirror Scan	<input type="checkbox"/>	<input type="checkbox"/>	Straight Line Backing	<input type="checkbox"/>	<input type="checkbox"/>	Checks Restricted	<input type="checkbox"/>	<input type="checkbox"/>
Oil Leaks	<input type="checkbox"/>	<input type="checkbox"/>	Points Out Hazards	<input type="checkbox"/>	<input type="checkbox"/>				Vision Areas/Off Track	<input type="checkbox"/>	<input type="checkbox"/>
Seats	<input type="checkbox"/>	<input type="checkbox"/>	Covers Brakes	<input type="checkbox"/>	<input type="checkbox"/>	<b>Leave Yourself An Out</b>			Utilizes Reference	<input type="checkbox"/>	<input type="checkbox"/>
Wheelchair Securm't	<input type="checkbox"/>	<input type="checkbox"/>	Checks Left-Right-Left	<input type="checkbox"/>	<input type="checkbox"/>	Observes Speed Limit	<input type="checkbox"/>	<input type="checkbox"/>	Points	<input type="checkbox"/>	<input type="checkbox"/>
			Proper distance from curb	<input type="checkbox"/>	<input type="checkbox"/>	Ensure Space Cushion	<input type="checkbox"/>	<input type="checkbox"/>	"Rock and Roll" at turns	<input type="checkbox"/>	<input type="checkbox"/>
<b>Equipment Usage</b>						Not Aggressive in Traffic	<input type="checkbox"/>	<input type="checkbox"/>	Intersections - pauses 3	<input type="checkbox"/>	<input type="checkbox"/>
Brakes	<input type="checkbox"/>	<input type="checkbox"/>	<b>Railroad Crossing</b>	<input type="checkbox"/>	<input type="checkbox"/>	Stopping Distance, Judge	<input type="checkbox"/>	<input type="checkbox"/>	seconds before moving	<input type="checkbox"/>	<input type="checkbox"/>
4-Way Flashers	<input type="checkbox"/>	<input type="checkbox"/>	*Activates 4-Way Flasher	<input type="checkbox"/>	<input type="checkbox"/>	Maintains Lane Positions	<input type="checkbox"/>	<input type="checkbox"/>	<b>Keep Your Eyes Moving</b>	<input type="checkbox"/>	<input type="checkbox"/>
Headlights On	<input type="checkbox"/>	<input type="checkbox"/>	Open Side Window	<input type="checkbox"/>	<input type="checkbox"/>	Smooth Starts/Stops	<input type="checkbox"/>	<input type="checkbox"/>	Eyes/Head Moving	<input type="checkbox"/>	<input type="checkbox"/>
Parking Brake Release	<input type="checkbox"/>	<input type="checkbox"/>	Stops 15'-50' from Tracks	<input type="checkbox"/>	<input type="checkbox"/>	Covers Brake	<input type="checkbox"/>	<input type="checkbox"/>	Checks Mirrors During	<input type="checkbox"/>	<input type="checkbox"/>
Mirror(s) Adjustment	<input type="checkbox"/>	<input type="checkbox"/>	Looks & Listens	<input type="checkbox"/>	<input type="checkbox"/>	Passing	<input type="checkbox"/>	<input type="checkbox"/>	Survey/Scan While	<input type="checkbox"/>	<input type="checkbox"/>
Seat Belt	<input type="checkbox"/>	<input type="checkbox"/>	Plans Ahead	<input type="checkbox"/>	<input type="checkbox"/>	Initial Brake Depression	<input type="checkbox"/>	<input type="checkbox"/>	Survey/Scan After	<input type="checkbox"/>	<input type="checkbox"/>
Steering Wheel	<input type="checkbox"/>	<input type="checkbox"/>	Merges into Traffic	<input type="checkbox"/>	<input type="checkbox"/>	Ensures Clearance/	<input type="checkbox"/>	<input type="checkbox"/>			
(Push-Pull)	<input type="checkbox"/>	<input type="checkbox"/>				Tailswing	<input type="checkbox"/>	<input type="checkbox"/>	<b>Other</b>	<input type="checkbox"/>	<input type="checkbox"/>
Signal Lights	<input type="checkbox"/>	<input type="checkbox"/>	<b>Make Sure They See you</b>	<input type="checkbox"/>	<input type="checkbox"/>	Adjusts Driving for Night/	<input type="checkbox"/>	<input type="checkbox"/>	Wheelchair 4 pt. Tie Down	<input type="checkbox"/>	<input type="checkbox"/>
Transmission	<input type="checkbox"/>	<input type="checkbox"/>	Smooth Maneuver/Merge	<input type="checkbox"/>	<input type="checkbox"/>	Restricted Vision	<input type="checkbox"/>	<input type="checkbox"/>	Passenger Lap Belt	<input type="checkbox"/>	<input type="checkbox"/>
*Use only when applicable			Signals Properly	<input type="checkbox"/>	<input type="checkbox"/>	Safe Lane Changes	<input type="checkbox"/>	<input type="checkbox"/>	Proper Fare Handling	<input type="checkbox"/>	<input type="checkbox"/>
Use of Controls	<input type="checkbox"/>	<input type="checkbox"/>	Communication	<input type="checkbox"/>	<input type="checkbox"/>				Proper radio procedure	<input type="checkbox"/>	<input type="checkbox"/>
<b>General</b>			Use of Horn	<input type="checkbox"/>	<input type="checkbox"/>	<b>Aim High In Steering</b>	<input type="checkbox"/>	<input type="checkbox"/>	Driver appearance	<input type="checkbox"/>	<input type="checkbox"/>
Log Procedures	<input type="checkbox"/>	<input type="checkbox"/>	Pedestrian Awareness	<input type="checkbox"/>	<input type="checkbox"/>	Survey/Scan Far Ahead	<input type="checkbox"/>	<input type="checkbox"/>	Professional manner	<input type="checkbox"/>	<input type="checkbox"/>
Accident Procedures	<input type="checkbox"/>	<input type="checkbox"/>	Other Motorists/Veh	<input type="checkbox"/>	<input type="checkbox"/>	Choice of Lane	<input type="checkbox"/>	<input type="checkbox"/>			
			Bicyclists / Pedestrians	<input type="checkbox"/>	<input type="checkbox"/>	Anticipates Conflicts	<input type="checkbox"/>	<input type="checkbox"/>			

**Driver Signature:** \_\_\_\_\_

**Instructor Signature:** \_\_\_\_\_

Comments: \_\_\_\_\_

**Safety Videos/DVDs  
Shown:**

**Smith System/5 Keys**  
**Wheelchair Securement**






## MV Transportation Division #64

### Training Department



#### Fixed Route Evaluation

Route Number: \_\_\_\_\_

Driver: \_\_\_\_\_

Trainer: \_\_\_\_\_

Date: \_\_\_\_\_

Vehicle Number \_\_\_\_\_

Time On Duty \_\_\_\_\_

Time Off Duty \_\_\_\_\_

Point Total 0

1 Unacceptable

2 Needs Major Improvement

3 Needs Minor Improvement

4 Acceptable

5 Excellent

Skills	Grade	Comments	Skills	Grade	Comments
1. Pre Ops Inspection			17. Left Turns		
2. Appearance			18. Lane Changes		
3. Attitude			19. Directional Signals		
4. Client Rights			20. Speed		
5. Passenger Assistance			21. Following Distance		
6. Wheelchair Ramp Operation			22. Traffic Conditions		
7. Wheelchair Securement			23. Pedestrians		
8. Seat Belt			24. Railroad Crossing		
9. Hand Position			25. Mirrors		
10. Braking			26. Freeways		
11. Acceleration			27. Schedules		
12. Backing			28. Radio Operations		
13. Traffic Signals			29. Equipment		
14. Intersections			30. Map Reading		
15. Right Turns			31. Bus Stops In / Out		
16. Up/ Down Hill Parking					
	0			0	



## MV TRANSPORTATION

Daily BTW and CADET hours log

Division: DASH Div. 64



DATE: \_\_\_\_\_

TRAINER: \_\_\_\_\_

TRAINEE: \_\_\_\_\_

BTW Hours Needed

Clock In

Lunch Out

Clock Out

Lunch In

Total Hours

Total BTW Hours for the day

Balance Due

Cadet Hours Needed

Clock In

Clock Out

Total Hours

Total Cadet Hours for the day

Balance Due

TRAINER'S NOTES: \_\_\_\_\_

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## **Attachment H**

### **Fixed Route Driver Interview Form**

## **Fixed Route Driver Interview Form**

Agency: LADOT

Contractor: \_\_\_\_\_

Driver First Name \_\_\_\_\_

Date and Place of Interview \_\_\_\_\_

Reviewer \_\_\_\_\_

- 
- 1 How long have you been a bus operator?
  - 2 When do you make on-board stop announcements?
  - 3 Are you provided a list of stops to announce?
  - 4 What do you do if a passenger asks you to announce a stop?
  - 5 Do you announce your route name/destination to waiting customers?
    - a. If yes, when, at what type of stops?
    - b. What do you announce?
  - 6 Do you drive buses that have automated stop announcement systems? How often
    - a. In your experience, does the automated stop announcement system typically work?
    - b. What do you do if the stop announcement system is not working?

- 7 Do you drive buses that make automated external bus route announcements? How often?
- a. In your experience, does the external route announcement system typically work?
  - b. What do you do if the bus route announcement system is not working?
- 8 Do you use the PA system to make on-board stop announcements? How often?
- a. In your experience, does the PA system typically work?
  - b. What do you do if the PA is not working?
- 9 Do you check at the beginning of each shift to see if the PA or enunciator equipment is working?
- a. 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? Is there anything that would help you?

## **Attachment I**

### **On-Board Stop Announcement Assessment Form**

## On-Board Fixed Route Stop Announcements Assessment Form

Transit System Name: **LADOT**      Garage: \_\_\_\_\_      Date: \_\_\_\_\_

Route #/Direction/Dest: \_\_\_\_\_ Bus or Car # \_\_\_\_\_

Boarded at: \_\_\_\_\_ Disembarked at: \_\_\_\_\_

Time: \_\_\_\_\_ AM / PM                      Time: \_\_\_\_\_ AM / PM

[illegible]

---

**Summary:**

## On System List

Other

# of announcements:	___Made	___Not Made	___Made	___Not Made
# of announcements:	___Voice	___PA	___Voice	___PA
# of announcements:	___Audible	___Not Audible	___Audible	___Not Audible

**Notes:**

Signature and Name: \_\_\_\_\_

## **Attachment J**

### **On-Board Stop Announcement Data**



# LADOT Stop Announcement Observations

Date	By	Pkg	Route	Dir	Bus	Boarding		Alight		Duration Observed	Stops Announced				
						Time	Location	Time	Location		PA	Voice	Total	Inaud./Mix.	Audible
4/19	jk	8B	CE413	in	87007	6:36	Laural Canyon/Vanover	7:30	Hill/8 <sup>th</sup>	0:54		3	3	1	2
4/19	jh	6	Downtown F	sb	2007	6:55	Flower/5th	7:15	Flower/Washington	0:20		8	8		8
4/20	tp	8B	CE549	in	xxxx	6:58	Lake St Station	7:50	Burbank/Fulton	0:52			0		0
4/20	jp	8A	CE438	nb	xxxx	7:05	37 <sup>th</sup> Transitway	7:14	Flower/3 <sup>rd</sup>	0:09		5	5		5
4/19	jp	8A	CE438	nb	92041	7:05	37 <sup>th</sup> Transitway	7:14	Figueroa/7 <sup>th</sup>	0:09		6	6		6
4/19	jh	4	Pico	wb	xxxx	7:25	Washington/Figueroa	7:40	Metro Station	0:15		14	14		14
4/19	tp	1-2	Wilshire/Koreatown	ccw	2077	7:47	Wilshire/Vermont	8:05	Western/Wilshire	0:18			0		0
4/20	tp	3	Van Nuys/Studio City	ccw	9311	7:58	Burbank/Fulton	8:12	Sylvan/Sylmar	0:14	11		11		11
4/21	tp	8B	CE419	in	92017	8:00	Chatsworth Sta.	9:20	Hill/4 <sup>th</sup>	1:20		8	8		8
4/19	tp	1-2	Hollywood/Wilshire	nb	99050	8:13	Western/Wilshire	8:36	Hollywood/Argyle	0:23			0		0
4/19	jp	6	Downtown F	nb	2007	8:20	USC Entrance 2	8:43	Figueroa/7th	0:23	12		12		12
4/20	tp	3	Panorama City/Van Nuys	ccw	9313	8:22	Sylvan/Sylmar	8:36	Metrolink	0:14	11	1	12		12
4/19	jp	6	Downtown E	sb	99023	8:47	Figueroa/7th	8:47	Los Angeles/8 <sup>th</sup>	0:00		1	1		1
4/19	tp	1-2	Beachwood Canyon	nb	6305	8:57	Hollywood/Argyle	9:11	Beachwood/Westshire	0:14		1	1	1	0
4/19	jp	6	Downtown E	sb	98023	8:57	Los Angeles/8 <sup>th</sup>	9:04	San Pedro/Washington	0:07		1	1		1
4/19	jp	1-2	King East	cw	98017	9:16	San Pedro/Washington	9:33	Grand/37 <sup>th</sup>	0:17			0		0
4/20	jh	8B	CE419	sb	92017	9:25	Hill/7th	9:40	Jefferson/Hoover	0:15		10	10		10
4/20	tp	3	Northridge	nb	99063	9:34	Northridge Metrolink	9:43	Nordhoff/Tampa	0:09		5	5	3	2
4/19	jh	6	Downtown C	sb	99027	9:40	7th/Flower	9:50	Grand/14th	0:10			0		0
4/19	tp	1-2	Beachwood Canyon	sb	6305	9:41	Beachwood/Westshire	9:49	Hollywood/Argyle	0:08		2	2		2
4/19	jh	6	Downtown D	ccw	xxxx	9:50	Grand/14th	10:05	Main/7th	0:15			0		0
4/20	tp	3	Northridge	sb	99061	9:51	Nordhoff/Tampa	10:09	Northridge Metrolink	0:18	18		18		18
4/19	tp	1-2	Hollywood	cw	99018	10:06	Hollywood/Argyle	10:36	Gower/Fountain	0:30		1	1		1
4/19	jp	1-2	Southeast	cw	6306	10:10	Grand/37 <sup>th</sup>	10:26	Vernon/Long Beach	0:16	8		8		8
4/19	jh	6	Central City East	cw	xxxx	10:15	Los Angeles/7th	10:25	Central/3rd	0:10			0		0
4/19	jh	6	Downtown A	wb	2011	10:30	3rd/Central	10:40	Grand/1st	0:10		8	8	8	0
4/19	jp	1-2	Pueblo del Rio	sb	6302	10:35	Vernon/Long Beach	10:40	Gage/Holmes	0:05			0		0
4/19	jp	5A	Chesterfield Sq	wb	2069	10:47	Gage/Wilmington	11:18	Florence/Main	0:31			0		0
4/19	jh	6	Downtown B	nb	98026	10:50	Grand/3rd	11:05	Union Station	0:15		8	8		8
4/19	tp	1-2	Hollywood	ccw	99014	11:03	Gower/Fountain	11:10	Highland/Sunset	0:07		3	3	1	2
4/19	jp	5A	Vermont/Main	sb	2071	11:30	Florence/Main	11:39	Century/Main	0:09		6	6	6	0
4/19	jh	1-2	Lincoln Heights	eb	1002	11:40	Alameda/Chavez	11:55	USC Med	0:15			0		0
4/19	jh	4	Boyle Heights	eb	xxxx	12:05	Mereno/Cornwell	12:30	Hamel/Gage	0:25			0		0
4/19	tp	1-2	Hollywood/W. Hollywood	sb	98105	12:14	Hollywood/Highland	12:30	La Cienega/3 <sup>rd</sup>	0:16			0		0
4/19	jp	5A	Watts	cw	6313	12:21	Century/Avalon	12:46	103 <sup>rd</sup> Blue	0:25		2	2		2
4/20	jp	5B	Wilmington	cw	9305	12:47	Figueroa/Pac Coast Hwy	13:03	Avalon/M St	0:16	11		11		11

**LADOT Stop Announcement Observations**

Date	By	Pkg	Route	Dir	Bus	Boarding		Alight		Duration Observed	Stops Announced				
						Time	Location	Time	Location		PA	Voice	Total	Inaud./Mix.	Audible
4/19	tp	1-2	Fairfax	eb	3003	12:52	La Cienega/3 <sup>rd</sup>	13:10	Fairfax/3 <sup>rd</sup>	0:18			0		0
4/19	jh	4	El Sereno	eb	2060	12:55	Hamel/Gage	13:15	Eastern/Lombardy	0:20			0		0
4/19	jp	1-2	Southeast	cw	99046	13:14	Vernon/Long Beach	13:34	Vernon/Vermont	0:20	2		2		2
4/20	tp	3	Warner South	cw	6311	13:20	Warner Ctr Transit Hub	13:32	Erwin/Canoga	0:12			0		0
4/20	tp	3	Warner North	cw	6310	13:35	Erwin/Canoga	13:52	Desoto Station Orange	0:17			0		0
4/20	jp	5B	Wilmington	cw	9305	13:37	Avalon/West Opp	13:59	Figueroa/Pac Coast Hwy	0:22	8		8		8
4/19	tp	1-2	Fairfax	wb	2078	13:43	Fairfax/3 <sup>rd</sup>	13:56	La Cienega/Melrose	0:13		1	1		1
4/19	jp	1-2	Leimert Slauson	ccw	2037	13:46	Vernon/Vermont	14:15	Magic Theater	0:29			0		0
4/19	tp	1-2	Hollywood/W. Hollywood	nb	6307	14:07	La Cienega/Melrose	14:28	Hollywood/Highland	0:21		1	1		1
4/20	jp	5B	San Pedro	sb	87032	14:20	Crestwood/Western	14:33	Centre/5 <sup>th</sup>	0:13		8	8		8
4/19	jh	1-2	Highland Park	eb/wb	99053	14:25	Figueroa/Ave. 60	14:45	Metro Station	0:20			0		0
4/19	jp	1-2	Crenshaw	cw	3002	14:26	Magic Theater	14:42	Stevely/Pinafore	0:16			0		0
4/19	tp	1-2	Hollywood	cw	60303	14:47	Hollywood/Highland	15:16	Vermont/Sunset	0:29			0		0
4/20	jp	8A	CE142	eb	87026	14:50	7th/PalosVerdes	15:12	Long Beach Transit Mall	0:22			0		0
4/20	jh	6	Bunker Hill Shuttle	nb	92057	15:00	Hope/4th	15:15	Union Station	0:15			0		0
4/19	jp	1-2	Crenshaw	ccw	3004	15:03	Stevely/Pinafore	15:24	Magic Theater	0:21			0		0
4/19	jp	1-2	Midtown	nb	99037	15:24	Magic Theater	15:47	Adams/Crenshaw	0:23			0		0
4/20	jp	8A	CE142	wb	87024	15:42	Long Beach Transit Mall	16:02	Grand/7 <sup>th</sup>	0:20			0		0
4/19	tp	1-2	Hollywood	ccw	2034	15:57	Vermont/Hollywood	16:12	Yucca/Argyle	0:15			0		0
4/19	jp	1-2	Midtown	sb	2036	16:07	Adams/Crenshaw	16:22	Magic Theater	0:15			0		0
4/20	jp	5B	San Pedro	nb	87030	16:20	Grand/7 <sup>th</sup>	16:33	Crestwood/Western	0:13		6	6	6	0
4/19	jp	1-2	Leimert Slauson	ccw	99052	16:22	Magic Theater	16:38	Crenshaw/Slauson	0:16		1	1		1
4/19	jp	1-2	Hyde Park Shuttle	eb	99019	16:48	Crenshaw/Slauson	16:51	Van Ness/59 <sup>th</sup>	0:03			0		0
4/20	jk	8A	CE448	out	87028	16:55	Flower/7 <sup>th</sup>	17:47	Crenshaw/PCH	0:52		1	1	1	0
4/20	jh	8B	CE422	sb	10	17:15	Broadway/Temple	17:35	Jefferson/Hoover	0:20		9	9		9
4/18	jp	6	Downtown DD	sb	6315	17:20	Hill/3 <sup>rd</sup>	17:25	Macy's Plaza/7 <sup>th</sup>	0:05		4	4		4
4/19	jk	8B	CE413	out	87008	17:33	Hill/8 <sup>th</sup>	18:35	Laural Canyon/Vanover	1:02			0		0
4/19	jp	5A	Chesterfield Sq	eb	2042	17:40	Slauson/Denker	18:08	Florence Blue	0:28			0		0

## **Attachment K**

### **Route Identification Announcements Assessment Form**

### Route/Line Identification Review Form

Transit System Name: LADOT

Stop/Station Location: \_\_\_\_\_ Date: \_\_\_\_\_

#### Record of External Announcements or Other Method of Route/Line Identification:

Page \_\_\_\_\_ of \_\_\_\_\_

1. Bus or Car # \_\_\_\_\_ Route #: \_\_\_\_\_  
Time: \_\_\_\_\_ Vehicle/Run Announced? ☐ YES ☐ NO  
Announcement: " \_\_\_\_\_ "
2. Bus or Car # \_\_\_\_\_ Route #: \_\_\_\_\_  
Time: \_\_\_\_\_ Vehicle/Run Announced? ☐ YES ☐ NO  
Announcement: " \_\_\_\_\_ "
3. Bus or Car # \_\_\_\_\_ Route #: \_\_\_\_\_  
Time: \_\_\_\_\_ Vehicle/Run Announced? ☐ YES ☐ NO  
Announcement: " \_\_\_\_\_ "
4. Bus or Car # \_\_\_\_\_ Route #: \_\_\_\_\_  
Time: \_\_\_\_\_ Vehicle/Run Announced? ☐ YES ☐ NO  
Announcement: " \_\_\_\_\_ "
5. Bus or Car # \_\_\_\_\_ Route #: \_\_\_\_\_  
Time: \_\_\_\_\_ Vehicle/Run Announced? ☐ YES ☐ NO  
Announcement: " \_\_\_\_\_ "
6. Bus or Car # \_\_\_\_\_ Route #: \_\_\_\_\_  
Time: \_\_\_\_\_ Vehicle/Run Announced? ☐ YES ☐ NO  
Announcement: " \_\_\_\_\_ "

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

\_\_\_\_\_  
\_\_\_\_\_

Signature and Name: \_\_\_\_\_

## **Attachment L**

### **Route Identification Announcements Data**

LADOT Route Identification Observations

Date	Time	Location	Route	Bus No.	Package	Announced?
4/19/2010	8:57	Hollywood & Argyle	Beachwood Canyon	6305	1-2	No
4/19/2010	10:54	Fountain & Gower	Hollywood/Wilshire	20705	1-2	No
4/19/2010	12:52	3rd & La Cienga	Hollywood	60307	1-2	No
4/19/2010	12:54	3rd & La Cienga	Fairfax	30003	1-2	No
4/19/2010	14:51	Melrose & La Cienga	Fairfax	3003	1-2	No
4/19/2010	15:07	Melrose & La Cienga	Hollywood/W. Hollywood	6307	1-2	No
4/19/2010	15:45	Hollywood Place & Vermont	Los Feliz	99058	1-2	No
4/19/2010	15:57	Hollywood Place & Vermont	Hollywood	2034	1-2	No
4/20/2010	13:35	Erwin & Canoga	Warner North	6310	3	No
4/20/2010	15:43	5th & Flower	CE437	87003	8A	No
4/20/2010	15:43	5th & Flower	DASH A	2015	6	No
4/20/2010	15:47	5th & Flower	DASH A	98028	6	No
4/20/2010	15:47	5th & Flower	DASH F	2003	6	No
4/20/2010	15:50	5th & Flower	DASH B	2030	6	No
4/20/2010	15:51	5th & Flower	DASH B	2001	6	No
4/20/2010	15:56	5th & Flower	DASH A	6315	6	No
4/20/2010	16:00	5th & Flower	CE438	92057	8A	No
4/20/2010	16:12	7th & Flower	DASH E	99026	6	No
4/20/2010	16:16	7th & Flower	DASH B	2016	6	No
4/20/2010	16:20	7th & Flower	DASH B	2009	6	No
4/20/2010	16:23	7th & Flower	DASH C	2031	6	No
4/20/2010	16:32	7th & Flower	DASH E	99028	6	No
4/20/2010	16:34	7th & Flower	DASH B	2013	6	No
4/20/2010	16:36	7th & Flower	DASH A	2028	6	No
4/20/2010	16:38	7th & Flower	DASH F	2006	6	No
4/20/2010	16:42	7th & Flower	DASH A	6316	6	No
4/20/2010	16:46	7th & Figueroa	DASH A	8208	6	No
4/20/2010	16:52	7th & Figueroa	DASH F	2005	6	No
4/20/2010	16:54	7th & Figueroa	DASH A	6316	6	No
4/21/2010	8:20	5th & Flower	DASH B	2013	6	No
4/21/2010	8:22	5th & Flower	DASH B	98023	6	No
4/21/2010	8:23	5th & Flower	DASH F	2002	6	No
4/21/2010	8:25	5th & Flower	CE423	xxxx	8B	No
4/21/2010	8:27	5th & Flower	DASH A	2020	6	No
4/21/2010	8:28	5th & Flower	CE409	92013	8B	No
4/21/2010	8:29	5th & Flower	DASH B	98022	6	No
4/21/2010	8:32	5th & Flower	DASH F	99024	6	No
4/21/2010	8:33	5th & Flower	DASH A	2017	6	No
4/21/2010	8:35	5th & Flower	DASH A	6317	6	No
4/21/2010	8:37	5th & Flower	DASH B	2021	6	No
4/21/2010	8:38	5th & Flower	DASH F	2006	6	No
4/21/2010	8:40	5th & Flower	DASH B	2014	6	No
4/21/2010	8:42	5th & Flower	DASH A	6316	6	No
4/21/2010	8:44	5th & Flower	CE423	87021	8B	No
4/21/2010	16:36	5th & Figueroa	DASH F	2001	6	No
4/21/2010	16:40	5th & Figueroa	DASH A	2011	6	No
4/21/2010	16:45	5th & Figueroa	DASH A	2028	6	No
4/21/2010	16:56	5th & Figueroa	DASH F	2007	6	No
4/21/2010	16:58	5th & Flower	DASH A	2017	6	No
4/21/2010	16:58	5th & Flower	DASH B	2026	6	No
4/21/2010	17:00	5th & Flower	DASH B	2029	6	No
4/21/2010	17:01	5th & Flower	CE448	92041	8A	No
4/21/2010	17:02	5th & Flower	DASH F	2007	6	No

LADOT Route Identification Observations

Date	Time	Location	Route	Bus No.	Package	Announced?
4/21/2010	17:03	5th & Flower	DASH A	6317	6	No
4/21/2010	17:04	5th & Flower	CE438	96401	8A	No
4/21/2010	17:05	5th & Flower	CE437	92055	8A	No
4/21/2010	17:07	5th & Flower	CE422	87017	8B	No
4/21/2010	17:08	5th & Flower	DASH F	2005	6	No
4/21/2010	17:09	5th & Flower	CE431	87022	8A	No
4/21/2010	17:10	Flower & 7th	DASH A	6713	6	No
4/21/2010	17:10	Flower & 7th	DASH F	2007	6	No
4/21/2010	17:11	5th & Flower	DASH B	98027	6	No
4/21/2010	17:12	5th & Flower	DASH A	2009	6	No
4/21/2010	17:12	5th & Flower	DASH F	2002	6	No
4/21/2010	17:14	5th & Flower	DASH B	2031	6	No
4/21/2010	17:15	5th & Flower	CE438	24502	8A	No
4/21/2010	17:15	Flower & 7th	CE422	87017	8B	No
4/21/2010	17:15	Flower & 7th	DASH F	2005	6	No
4/21/2010	17:16	5th & Flower	CE437	98048	8A	No
4/21/2010	17:19	5th & Flower	DASH A	2011	6	No
4/21/2010	17:19	5th & Flower	DASH F	2006	6	No
4/21/2010	17:20	5th & Flower	CE431	92058	8A	No
4/21/2010	17:20	Flower & 7th	CE448	24501	8A	No
4/21/2010	17:20	Flower & 7th	DASH A	6316	6	No
4/21/2010	17:20	Flower & 7th	DASH A	2009	6	No
4/21/2010	17:25	Flower & 7th	CE438	24502	8A	No
4/21/2010	17:25	Flower & 7th	DASH F	2002	6	No
4/21/2010	17:30	Flower & 7th	CE422	87016	8B	No
4/21/2010	17:30	Flower & 7th	DASH A	2011	6	No
4/21/2010	17:35	Flower & 7th	CE438	65002	8A	No
4/21/2010	17:35	Flower & 7th	DASH F	2006	6	No
4/21/2010	17:40	Flower & 7th	DASH A	2028	6	No
4/21/2010	17:40	Flower & 7th	DASH B	98023	6	No