



F E D E R A L T R A N S I T A D M I N I S T R A T I O N

Toledo Area Regional Transit Authority
FTA ADA Stop Announcement and Route Identification
Final Review Report

May 2015

Federal Transit Administration



U.S. Department of Transportation
Federal Transit Administration

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Contents

1. Table of Contents

Executive Summary	1
1. General Information.....	3
2. Jurisdiction and Authorities	4
3. Purpose and Objectives.....	5
3.1 Purpose.....	5
3.2 Objectives	5
4. Introduction to Toledo Area Regional Transit Authority	6
4.1 Introduction to Services and Organizational Structure.....	6
5. Scope and Methodology	7
5.1 Scope.....	7
5.2 Methodology	7
6. Findings and Advisory Comments.....	11
6.1 Complaint Resolution and Compliance Information	11
6.2 Stop Announcements	14
6.3 Orientation Announcements	16
6.4 Route Identification	17
6.5 Training.....	18
6.6 Maintenance of Accessible Features: General.....	20
Summary Table of Compliance Review Findings	24

Attachment A - FTA Notification Letter

Attachment B - On-Site Review Schedule

Attachment C - Coach Operator Interview Form

Attachment D - Agency/Customer Contact Forms

Attachment E - TARTA Complaint Form

Attachment F - Stop Announcement Observation Form

Attachment G - Route Identification Observation Form

Attachment H - TARTA Response to Draft Report

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Executive Summary

Objective and Methodology –

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

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

TARTA's Stop Announcement and Route Identification Program includes the following positive program elements.

Positive Program Elements

- One hundred percent of TARTA's fixed route fleet is equipped with an automated voice annunciator system, referred to as "Talking Bus" by the manufacturer Clever Devices.
- Coach operators cannot disable the Talking Bus system, and Dispatch is able to monitor whether the system is operable in each bus. If the Talking Bus system fails in a particular vehicle, Dispatch is often able to reset it remotely. If that fails, Dispatch has Maintenance immediately trade out the bus and replace it with a bus with an operable Talking Bus system.
- TARTA has a lengthy training program, a minimum of 24 days for new coach operators, and includes a module devoted specifically to announcing bus stops if the Talking Bus system is inoperable.
- TARTA conducts mandatory, quarterly training meetings with all of its employees, and each meeting emphasizes ADA requirements, including the obligation to announce bus stops if the Talking Bus system is inoperable.
- TARTA has a thorough complaint investigation program that attempts to address every complaint received within 48 hours of receipt of the complaint.

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

Administrative Deficiencies

- TARTA is not consistently identifying ADA related complaints. TARTA tracks complaints through a coding system; however, numerous complaints that are ADA related were miscoded as a "coach operator" complaint and therefore not investigated as an ADA related complaint.

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

Substantive Deficiencies

- TARTA coach operators are not announcing all required bus stops and identifying routes at transfer points with other routes if the Talking Bus system is inoperable. TARTA management is not effectively monitoring coach operator compliance with ADA requirements for bus stop announcements and route identification.
- TARTA's Talking Bus system is not programmed to announce destination points or intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.
- TARTA's Talking Bus system announcements do not include each instance when two or more bus routes intersect for route identification purposes.
- TARTA management has not trained coach operators to announce major intersections, destination points, orientation intervals, and to identify routes when two or more routes intersect if the Talking Bus system is inoperable.
- TARTA's Talking Bus system equipment and external speakers are not included in TARTA's preventive maintenance program, and Talking Bus operability and external speaker functionality are not part of TARTA's pre-trip inspection procedures.

1. General Information

This chapter provides basic information concerning this compliance review of Toledo Area Regional Transit Authority (TARTA). Information on TARTA, the review team, and the dates of the review are presented below.

Grant Recipient:	Toledo Area Regional Transit Authority (TARTA)
City/State:	Toledo, OH
Grantee Number:	5022
Executive Official:	James Gee, General Manager/CEO
On-site Liaison:	Tom Metzger, Transportation Superintendent
Report Prepared By:	Advanced Systems Technology and Management, Inc. (AdSTM)
Dates of On-site Visit:	January 12–14, 2015
Review Team Members:	Gwen Larson (Lead Reviewer), Keith Carlson, Sue Mason, and John Mecca

2. Jurisdiction and Authorities

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

The Federal Transit Administration (FTA) is responsible for ensuring compliance with the ADA and the DOT regulations implementing the ADA.

3. Purpose and Objectives

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

3.1 Purpose

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

3.2 Objectives

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

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

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

4. Introduction to Toledo Area Regional Transit Authority

Toledo Area Regional Transit Authority (TARTA) of Toledo, Ohio, provides public transit services in the Toledo metropolitan area, which includes the City of Toledo and adjoining communities in Lucas County (Maumee, Ottawa Hills, Sylvania, Sylvania Township, and Waterville) and Wood County (Rossford). TARTA provides fixed route bus and ADA complementary paratransit service (TARPS). TARTA also provides demand response service (Call-A-Ride) in suburban areas outside of the fixed route service and offers shuttle service from Park-and-Ride lots to seasonal sports and other entertainment venues. Approximately 400,000 people live in the TARTA service area, which covers roughly 133 square miles.

4.1 Introduction to Services and Organizational Structure

TARTA, a regional transit authority, was formed in 1971 through an agreement between the City of Toledo and several suburban and semi-rural jurisdictions. Local funding is provided from a dedicated portion of property taxes. A Board of Trustees governs TARTA, and there are 14 Trustees appointed by the municipalities that participate in the regional transit authority. The Board elects its own officers. The TARTA General Manager/CEO reports directly to the Board of Trustees. The General Manager/CEO is responsible for the day-to-day operations of the organization, and the remaining TARTA employees report to him.

TARTA services operate seven days a week on 37 fixed routes (with 27 variations). Fixed route service is provided from 5:30 a.m. to 11:30 p.m. on weekdays, from 6:45 a.m. to 10:45 p.m. on Saturday, and from 7:25 a.m. to 8:35 p.m. on Sunday. TARTA directly operates all bus routes and does not utilize contractors. On an average weekday, TARTA fixed route bus ridership totals approximately 10,500; FY13 fixed route unlinked trips totaled 3,128,592.

TARTA's entire fleet of 90 buses is equipped with Automatic Voice Annunciation (AVA), which makes both on-board stop announcements and external route identification announcements.



5. Scope and Methodology

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

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

5.1 Scope

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

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

- Complaint resolution and compliance information (49 CFR §§ 27.13(b) and 27.121(b))
- Nondiscrimination (49 CFR § 37.5)
- Service under contract (49 CFR § 37.23) (if applicable)
- Training requirements (49 CFR § 37.173)
- Maintenance of accessibility features (49 CFR § 37.161)
- Stop announcements (49 CFR § 37.167(b))
- Route identification (49 CFR § 37.167(c))

5.2 Methodology

The FTA Office of Civil Rights sent a notification letter to TARTA's General Manager, James Gee, on September 26, 2014, confirming the time frame for the review and requesting that information be sent to the review team within 30 days of the date of the notification letter.

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

- TARTA's description of how its fixed route service is structured
- Public information describing TARTA's fixed route service
- Fixed route bus fleet roster
- Stop lists or other information provided to operators
- Information describing the methods TARTA uses to make stop announcements and route identifications

- Information describing any technology TARTA uses to make stop announcements and route identifications
- TARTA's documentation notifying coach operators, supervisors, mechanics, technicians and other transit personnel regarding stop announcement and route identification procedures, policies, and maintenance requirements
- TARTA's training materials for coach operators, supervisors, mechanics, technicians and other transit personnel regarding stop and route identification announcements, and maintenance of vehicle announcement equipment
- TARTA's documentation regarding stop and route identification and route identification announcement monitoring activities and results
- TARTA's list of complaints related to stop announcements and route identification filed with TARTA in the past year
- Copies of TARTA's contracts with private or public contractors providing fixed route service, if applicable

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

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

The on-site review of TARTA took place from January 12–14, 2015. On the first day and for two hours on the second day, review team members conducted, recorded, and tabulated covert stop announcement and route identification observations made in the field. An opening conference was held at 10 a.m. on Tuesday, January 13, 2015 at the TARTA administrative offices at 1127 West Central Avenue, Toledo, OH 43697-0792. As part of this meeting, the review team presented a proposed schedule for the remainder of the site visit. The following people attended the meeting:

Name	Title
Tom Metzger	Transportation Superintendent
Marjorie Espina	Region V, Regional Civil Rights Officer (RCRO)
Gwen Larson	Lead Reviewer
Sue Mason	Reviewer

Following the opening conference, the review team met with TARTA staff to discuss the information sent in advance as well as the information and materials that were available on site. TARTA's policies and procedures were discussed. For the remainder of the day, the review team discussed the process in place at TARTA to record and respond to customer complaints and requested complaint data from the past year. Two team members conducted field observations for two hours during the morning line-up at the Downtown Loop.

On Tuesday, January 13, 2015, the review team collected data and interviewed coach operators, supervisors, managers, and technical staff at TARTA to learn more about the policies, procedures, and practices regarding stop announcements and route identification. Coach operators at the Central Garage, co-located with TARTA's administrative offices, provided information regarding their knowledge of the policies and requirements, and the training they received. Team members interviewed TARTA managers regarding maintenance, employee training, compliance monitoring oversight, any disciplinary actions taken, and effective oversight of staff. TARTA information technology personnel and maintenance personnel were interviewed to obtain information about the agency's AVA equipment installation and management policies, procedures, and practices.

The review team paid particular attention to whether discrepancies existed between TARTA policies and observed day-to-day practices regarding stop announcements, route identification, route identification announcements, maintenance of accessibility features, and complaint handling. In addition, the review team observed whether TARTA made the required announcements, maintained the automated systems installed to provide such announcements, and made the required announcements if the automated system was inoperable.

The review team gathered and analyzed the following information:

- Comments from riders and advocates from telephone interviews, and through a review of the comments and complaints on file at FTA and TARTA
- Complaint reports prepared by TARTA showing the number, type, and resolution of stop announcement, route IDs, and route identification complaints
- Direct observations by review team members of the handling of stop announcements and route identification announcements, and interviews with TARTA operators and managers about the agency's training regarding stop announcements, route IDs and route identification announcements, monitoring, and discipline.

On Tuesday, January 13, 2015, the review team tabulated the various data that had been gathered and prepared for the exit conference.

The exit conference took place on Wednesday, January 14, 2015 at 10 a.m. at the TARTA office. Attending the conference were:

Name	Title
Jim Gee	General Manager/CEO
Tom Metzger	Transportation Superintendent
Michael Blackston	Director of Information Services
John Day	FTA HQ Office of Civil Rights
Marisa Appleton	FTA HQ, Office of Civil Rights
Marjorie Espina	Region V, Regional Civil Rights Officer (RCRO)
Gwen Larson	Lead Reviewer
Keith Carlson	Reviewer
Sue Mason	Reviewer
John Mecca	Reviewer

6. Findings and Advisory Comments

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

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

Findings of deficiency shall always require corrective action and/or additional reporting, and will always be expressed as:

- A statement concerning the policy or practice in question at the time of the review
- A statement concerning the DOT ADA requirements being violated or potentially being violated
- A statement concerning the required corrective action to resolve the issue

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

6.1 Complaint Resolution and Compliance Information

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

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

Note: While requirements to respond to complainants are not included in the DOT ADA regulations, it is a common and effective practice for a transit agency to respond to complainants and for transit agencies to investigate allegations to ensure that all DOT ADA requirements are

being met. If the transit agency has not established these policies and procedures, review team members shall include them as advisory comments.

Discussion: During this compliance review, deficiencies were found with the requirement to resolve complaints promptly and equitably and keep summaries and records of complaints on file or with how the transit agency communicates its complaint policies and procedures to customers.

Prior to the site visit, FTA informed the review team that no formal ADA complaints were on file for TARTA. The review team conducted telephone interviews with six agencies that serve clients with disabilities who use TARTA service. The agencies contacted included:

- Toledo Society for the Blind
- Lucas County Non-Emergency Transportation Services
- Toledo Veterans Center
- Sight Center of NW Ohio
- Lucas County Department of Jobs and Family Services
- Lucas County Board Developmental Activities
- Board of Developmental Disabilities

Persons interviewed at these agencies were generally not aware of clients with specific complaints about TARTA's fixed route service since the majority of their clients use TARTA's ADA complementary paratransit service (TARPS).

Prior to the on-site visit, team members reviewed TARTA's written policies and procedures for the complaint process and developed site visit questions. During the on-site review, team members interviewed TARTA's General Manager/CEO, Transportation Superintendent, and Director of Information Services.

TARTA maintains written policies/procedures for the complaint process. There is a dedicated complaint phone line (419-245-5250) that is covered 24/7 by voice and voicemail systems. Customers also have three other options to file a complaint:

- E-mail – on TARTA's website (www.tarta.com/contact) customers can file a complaint by e-mail.
- Walk-in – customers can file a complaint in person at TARTA's administrative office. Information about customer service walk-in hours is available on TARTA's website.
- Mail – customers can file a complaint by mail. The mailing address is provided on TARTA's website.

It was observed during this compliance review that TARTA responds quickly to complaints, including those that are ADA-related. All complaints are channeled to one person within the agency, and a process is in place to accept complaints when this individual, an Administrative Assistant, is on break or out of the office. Voicemail is checked daily in the morning to retrieve any complaints. All complaints are entered in the complaint log. An attempt is made to respond by phone within 48 hours to inform the complainant that the complaint is being investigated and

ask for additional information, if needed. This individual tries to ensure that complaints are investigated within 48 hours of receipt.

If a Civil Rights complaint is received, including an ADA complaint, it is immediately forwarded to the Transportation Superintendent. The Transportation Superintendent determines which individual within the organization shall complete the investigation, and he follows up to ensure the investigation was completed. The Transportation Superintendent investigates ADA-specific complaints directly, responds to ADA complaints within 48 hours, and the response and resolution of complaints is documented.

All complaints are investigated, and parties are interviewed by phone (complainant) and in person (coach operators or other staff). If necessary during the investigation, video and AVL evidence can be pulled by the Road Supervisors, Information Services, and the Transportation Superintendent. TARTA's wireless connection is used during bus pull-in to download data from the interior and exterior cameras. This data can be pulled immediately if necessary. Data is stored on the buses for approximately four to six weeks and then is downloaded to the mainframe.

The Transportation Superintendent stated that all complaints are investigated by transit management staff and they "strive to investigate, and answer/respond within 48 hours." The Transportation Superintendent pointed out that the number of complaints has decreased by 50% since the Transportation Superintendent took the position at TARTA in 2010 (~1,300 complaints in 2009 to ~700 complaints in 2014).

The complaint investigation process is overseen and managed solely by the Transportation Superintendent, although investigations may involve multiple departments. If the complaint is valid, the Transportation Superintendent is the final arbiter of all complaints and responsible for administering TARTA's progressive discipline policy. The Transportation Superintendent discussed the official five-step process – counseling, verbal discussion, written warning, suspension, and termination – and noted that no complaint resolution has exceeded counseling in the past two years.

The Transportation Superintendent reiterated that ADA-specific complaints are followed up on and responded to within 48 hours and the response and resolution of complaints is documented. If the ADA complaint is about a coach operator, retraining is mandatory in all areas of ADA. Retraining can be integrated with new operator training.

TARTA maintains a complaint database that it uses to spot trends or problems. The Transportation Superintendent indicated that the majority of complaints are related to physical location and condition of bus stops. Both the Transportation Superintendent and the General Manager referred to increased construction activity in the Toledo area. TARTA has a policy in place (Orange Cone policy) that it will not pickup/drop off at bus stops that are close to construction zones. However, TARTA is flexible to accommodate riders by moving stops (usually temporarily) to locations outside these zones or establishing special 'flag' stops. The Transportation Superintendent cited an example of the recent work TARTA performed (pouring a new concrete pad) to relocate a stop to better accommodate mobility devices.

The Administrative Assistant maintains the complaint log and enters a ‘code’ for each complaint (i.e., is it a complaint about maintenance, operator conduct, ADA, etc.). The Transportation Superintendent and the Administrative Assistant review complaints once a day. The code is entered in the complaint log, and the complaint is then investigated. During discussion of the site visit questions, the Transportation Superintendent indicated that “less than 0.001 percent of all complaints are ADA complaints over the last five years, none for voice annunciation.”

However, in reviewing TARTA’s complaint log for 2013 and 2014, it was detected that the Administrative Assistant was not consistently identifying ADA related complaints as such. There were numerous complaints that were ADA-related that were miscoded as an “operator” complaint. These complaints were not forwarded to the Transportation Superintendent for investigation since they had been incorrectly labeled as non-ADA. Therefore, TARTA is not properly investigating ADA-related complaints.

Corrective Action Schedule: Within 60 days of the issuance of the final report, TARTA shall submit to the FTA Office of Civil Rights, procedures for correctly identifying complaints that are ADA-related. The procedures shall incorporate a process for periodic review by a supervisor, knowledgeable in DOT’s ADA requirements, of all complaints received by the Administrative Assistant to verify that complaints are coded correctly, and that ADA complaints are properly addressed.

6.2 Stop Announcements

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

- (1) The entity shall announce at least at transfer points with other fixed routes, other major intersections and destination points,
- (2) The entity shall announce any stop on request of an individual with a disability.

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

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

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

Discussion: During this compliance review, deficiencies were found with the requirements for making stop announcements.

It was observed that TARTA utilizes an automated stop announcement and route identification program in all of its fixed route fleet vehicles called Talking Bus, manufactured by Clever Devices. However, while the review team was on site, the Talking Bus system was partially inoperable. On Monday, January 12, 2015, review team members rode buses from 7 a.m. until 7 p.m. on 27 separate route segments. TARTA runs 34 different routes with 27 variations (the variations are for a.m. and p.m. rush hours and weekends). According to TARTA's published schedules and stop lists, 484 stops should have been announced. Team members observed that a total of 271 stops were announced and 213 were not announced – an average of 56% of stops announced.

It was observed while review team members rode the buses that bus operators did not call out bus stops or identify routes on five of the six routes in which the Talking Bus system was inoperable. On the one route in which the bus operator did announce stops, only six of the 22 stops were announced, and the coach operator did not identify the route when necessary.

When questioned about the inoperable Talking Bus system, TARTA management stated that they were aware the system was having difficulties. They explained that they implemented a new schedule (run cut) on Sunday, January 4, 2015, which created difficulties for the Talking Bus system. Management said it appeared that elements of the Talking Bus system did not have all the data needed to operate the system on the revised schedule. Representatives from Clever Devices were scheduled to meet with management at the TARTA offices on Thursday, January 15, 2015, to determine how to resolve the problems.

TARTA's posted policy requires coach operators to announce major intersections and any stop at the request of an individual with a disability when the Talking Bus system is inoperable. In addition, Dispatch plays an automated announcement over the two-way radio system once every hour each day, which reminds coach operators to announce major intersections if the Talking Bus system is not working.

However, TARTA management does not provide a copy of the stops to be announced or locations where routes must be identified to its coach operators onboard the buses. Instead, only the major intersections are posted in a non-removable location in the bullpen (staging room), and coach operators are expected to memorize the list. Team members interviewed coach operators about this procedure, and some stated that it was too difficult to memorize the list of major intersections, especially since the new schedule was implemented. Coach operators mentioned that when they drive different routes (extra board) it is difficult to memorize all the different stop announcement lists.

TARTA road supervisors and operator trainers do ride buses periodically to monitor coach operator performance, and this includes compliance with bus stop announcements and route identification requirements. TARTA management stated that coach operators meet all requirements when a supervisor is watching them, and they understand this is not an effective means of monitoring operators for ADA compliance.

Therefore, TARTA relies on the Ohio Transit Risk Pool (OTRP) to monitor its coach operators for bus stop announcement compliance. Mystery (ghost) riders from OTRP ride the buses annually to monitor operators' performance in several areas. One item OTRP monitors is whether bus stop announcements are made. However, the checklist used by OTRP does not monitor whether routes are identified, when required.

OTRP conducted its most recent ghost ride in November 2014, and ghost riders reported 100 percent compliance with bus stop announcements. Yet, this is not a reliable indication of compliance with bus stop announcements since the OTRP ghost riders do not receive a copy of the stops that should be announced. The OTRP is simply monitoring whether or not any announcements are made, and not if the required stops are announced.

Corrective Action Schedule: Within 60 days of the issuance of the final report, TARTA shall submit to the FTA Office of Civil Rights:

- Procedures to ensure that coach operators announce all required bus stops and identify routes at transfer points with other routes, if the Talking Bus system is inoperable. It is a best practice to make the list of bus stops to be announced and route identification locations available on every fixed route vehicle.
- Procedures to effectively monitor coach operator compliance with ADA requirements for bus stop announcements and route identification. It is a best practice to pull the digital video recordings when Dispatch is notified that the Talking Bus system is inoperable in a particular bus.

6.3 Orientation Announcements

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

- (1) The entity shall announce at least at transfer points with other fixed routes, other major intersections and destination points, and intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.
- (2) The entity shall announce any stop on request of an individual with a disability.

The transit agency must establish policies and procedures for an effective means of route identification. The DOT ADA regulations do not require transit agencies to equip vehicles with an automated announcement and/or route identification system. Instead, the regulations require the transit agency to ensure that operators make stop announcements, route IDs, and route identification announcements for everyone and, in addition, to ensure that whenever a customer

with a disability requests it, operators announce a stop. If an automated system malfunctions, the operator does not use the system, or the vehicle is not equipped with such a system, the operator remains responsible under the DOT ADA regulations to make announcements at intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location. The transit agency must not limit the provision of stop announcements and route identifications to those customers who, in the operator's opinion, need the announcement.

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

Discussion: During this compliance review, deficiencies were found with the requirements for making orientation announcements.

TARTA management programmed Talking Bus to announce only major intersections. Based on field observations, the review team discerned that the list of major intersections is inadequate for route orientation announcements. Talking Bus is not announcing destination points or intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location. The review team observed some routes where there were long gaps (up to two miles) when no announcements were made.

Corrective Action Schedule: Within 60 days of the issuance of the final report, TARTA shall submit to the FTA Office of Civil Rights a plan for ensuring that destination points and intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location are announced.

6.4 Route Identification

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

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

Discussion: During this compliance review deficiencies were found with the requirements for route identification.

TARTA's policy for route identification is based on using major intersections. The General Manager and route planners meet monthly with community advocacy groups and solicit public input at monthly Trustee Meetings. Coach operators periodically distribute onboard surveys (developed by Planning) asking passengers to provide route and destination information and suggestions for improvement. During field observations, the review team discerned that route identification announcements are inadequate. Talking Bus announcements do not include each instance when two or more bus routes intersect for route identification purposes.

Corrective Action Schedule: Within 60 days of the issuance of the final report, TARTA shall submit to the FTA Office of Civil Rights a plan for ensuring that route identification announcements are made wherever two or more bus routes intersect.

6.5 Training

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

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

Discussion: During this compliance review, deficiencies were found with training requirements.

The review team reviewed training materials and discussed TARTA's training program with the Transportation Superintendent. During the on-site review, the Transportation Superintendent described several elements of the new coach operator training and retraining platforms that have been implemented in the last two to three years. These platforms were added to enhance ADA compliance awareness and emphasize DOT ADA regulations requiring that operators make stop announcements and route identifications. Although TARTA's entire bus fleet is now equipped with an automated annunciator system, the training program emphasizes the importance of making stop announcements and route identifications when the automated system is not working.

TARTA also uses a comprehensive training video developed by the Ohio Transit Risk Pool (OTRP) for Ohio transit agencies.

The Transportation Superintendent mentioned that voice annunciation and sensitivity training have been added to the three-year training cycle for wheelchair tie-down procedures, to begin in February and March 2015. All coach operators will be retrained in 2015.

Both the Transportation Superintendent and General Manager described the establishment of a closed road course (located at the central garage) that is being used to train coach operators for CDL requirements, general operator training, and includes a section on ADA requirements. One road supervisor (a former coach operator) works with the safety and training departments to coordinate new operator training, as well as retraining operators for specific issues identified during supervisor ride-alongs, ghost rider observations, and/or from complaints.

The Transportation Superintendent explained that the five-step progressive discipline policy (counseling, documented verbal discussion, written warning, suspension, and termination) applies to all employees. The Amalgamated Transit Union (ATU) represents operators and mechanics, and the Toledo Area Administrative Professionals (TAAP) union represents dispatchers and professional employees; both unions support the progressive discipline policy.

The Transportation Superintendent reported that no other disciplinary actions (other than Step 1-Counseling) were taken for ADA violations (including stop announcements and route identifications) in the last year. Counseling and retraining are the “front-line” actions, and the Transportation Superintendent talks to operators who are in compliance to encourage positive reinforcement. The Transportation Superintendent is trying to implement a “mentoring” program pairing senior operator trainers with new operators to reinforce compliance.

The Transportation Superintendent instituted quarterly “Town Hall” meetings for all TARTA staff that are mandatory for the entire transportation department including coach operators, mechanics, and dispatchers. Different topics are discussed, but every meeting includes reinforcement of the requirements for stop announcements and route identifications.

Another compliance reinforcement element the Transportation Superintendent implemented is recording an automated announcement reminding coach operators that ADA compliance includes making stop announcements and route IDs. The pre-recorded message is pushed through hourly over the two-way radio system. The voice used to record the message is distinctively different from the dispatchers’ voices so it stands out over dispatch traffic. Two review team members heard this announcement during covert field observations. The volume and voice stand out from dispatch traffic on the coach operator’s radio system, but it does not interfere with the automated annunciator system.

During discussion of the site visit questions, the Transportation Superintendent opined that the most significant training challenge has been with senior operators (“old dog/new trick” syndrome). In the past five years, approximately 30 percent of senior operators retired or resigned. It has been easier to implement ADA compliance training (including stop

announcements and route identification training) with new operator trainees because they do not have to “unlearn old habits.”

Upon reviewing TARTA’s training materials, however, it was discovered that coach operators are only required to announce major intersections and any stop on request from an individual with a disability when the Talking Bus system is inoperable. Coach operators are not instructed to call out destination points, orientation points, or transfer points where two or more bus routes intersect.

Corrective Action Schedule: Within 60 days of the issuance of the final report, TARTA shall submit to the FTA Office of Civil Rights documentation that it has trained coach operators to announce major intersections, destination points, orientation intervals, and to identify routes when two or more routes intersect.

6.6 Maintenance of Accessible Features: General

Maintain in Operative Condition

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

Transit agencies must maintain in operating condition the public address (PA) systems used to announce stops aboard their buses¹, their stop and route identification signs, and other accessibility equipment. Effective repair and preventive maintenance programs are key to keeping accessibility features in good working order. Appendix D to 49 CFR § 37.161 notes: “It is not sufficient to provide features such as lift-equipped vehicles, elevators, communications systems to provide information to people with vision or hearing impairments, etc. if these features are not maintained in a manner that enables individuals with disabilities to use them.”

Discussion: During this compliance review, deficiencies were found with the requirements concerning maintenance of accessibility features.

The review team interviewed the Director of Information Services and the electronics technician responsible for maintaining the automatic voice annunciator (AVA) system. They provided information on the system installed on TARTA’s bus fleet - the fleet is 100 percent AVA-equipped. The AVA system TARTA uses is manufactured by Clever Devices, Inc. (DR-600) and the system is integrated with the internal and external speakers, the scrolling LED interior sign, and the front exterior LED destination sign. Within the last two years, TARTA completed installation of an automatic vehicle locator (AVL) system, global positioning satellite (GPS) software, wireless capability, and a new two-way radio system.

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

The Director of Information Services and the electronics technician, and (during later interviews) the Transportation Superintendent and General Manager, mentioned the difficulties encountered working with the manufacturer to complete the installation of Talking Bus and to get all components working correctly. TARTA staff acknowledged they are still resolving issues that affect the maintenance and operation of this accessible feature.

During discussions with the Director of Information Services and electronics technician, the review team asked how general automated annunciator system maintenance is performed. At the time of the site visit “repair as needed-failure triggers repair” is the current practice. This can be partially attributable to the severe labor shortage in the Toledo area - electronics technicians and information services, specifically. There is one electronics technician working with Director of Information Services to repair 90 automated annunciator systems.

In reviewing TARTA’s preventive maintenance checklist, it was discerned that the Talking Bus equipment and external speakers are not included in TARTA’s preventive maintenance procedures. TARTA management stated that they only had one electronics technician to service Talking Bus, so this electronics technician was not able to conduct preventive maintenance on Talking Bus or the external speakers. The electronics technician works overtime in order to keep up with the service repairs, and management said it has been trying to hire an additional Talking Bus electronics technician for over a year.

During interviews, TARTA management stated that all fixed route buses are equipped with external speakers that are integrated with the Talking Bus system, and opening the door triggers the route identification announcement. However, during covert field observations the review team did not hear any external route identification announcements. On Monday, January 12, 2015, review team members rode 26 different buses and did not hear a single external route identification announcement. The next morning two team members went to two stations on the Downtown Loop (Government and Park) during the morning pull-in, observed 50 different buses, and again did not hear a single external route identification announcement. TARTA management was unaware that external route identification announcements were not operating correctly. TARTA management was unable to identify the cause of the problem; they were not sure if it was a problem with the speakers or a glitch in the Talking Bus system.

The review team asked TARTA management if external speaker functionality and an operable Talking Bus system were part of the pre-trip inspection procedures. At the time of the site visit, there is no formalized pre-trip inspection process to check external speakers and the automated annunciator system. TARTA plans to install Fleetwatch software that will generate an electronic pre-trip inspection record that includes these items; however, there is no specific timeframe. It should be noted that dispatch is automatically notified when Talking Bus is inoperable in a particular vehicle.

Corrective Action Schedule: Within 60 days of the issuance of the final report, TARTA shall submit to the FTA Office of Civil Rights:

- Documentation that the Talking Bus system and external speakers have been added to TARTA's preventive maintenance checklist, and evidence that preventive maintenance on these systems is being conducted.
- Documentation that the external speakers are operational on all fixed route vehicles, and that operators are checking speaker functionality during daily pre-trip inspections.

Prompt Repair of Accessible Features and Accommodating Riders with Disabilities

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

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

Discussion: During this compliance review, no deficiencies were found with the requirements concerning timely repair of accessibility features.

TARTA has implemented the Talking Bus system in 100% of its fixed route fleet, and it has a 20% spare ratio, so under normal circumstances, when Talking Bus fails in just one or two vehicles at a time, TARTA has no difficulty removing that bus from service and replacing it with a vehicle in which Talking Bus is operable.

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

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

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

Discussion: During this compliance review, no deficiencies were found during review of the transit agency's public information or observed during the site visit with respect to the requirements concerning isolated or temporary interruptions in service or access due to maintenance or repair of accessibility features.

TARTA has implemented the Talking Bus system in 100% of its fixed route fleet, and it has a 20% spare ratio, so under normal circumstances, when Talking Bus fails in just one or two vehicles at a time, TARTA has no difficulty removing that bus from service and replacing it with a vehicle in which Talking Bus is operable.

Summary Table of Compliance Review Findings

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding deficiency/ no deficiency or advisory comment	Finding(s) of Deficiency	Response Days/Date
1	Complaint Resolution and Compliance Information	27.13(b); 121(b); 37.5	Deficiency	TARTA is not consistently identifying ADA-related complaints. TARTA tracks complaints through a coding system, and there were numerous complaints that were ADA-related that were miscoded as a “coach operator” complaint. These complaints were not forwarded to the Transportation Superintendent for investigation since they had been incorrectly labeled as non-ADA. Therefore, TARTA is not properly investigating ADA-related complaints.	Within 60 days of issuance of final report
2	Stop Announcements	37.167(b)	Deficiency	TARTA coach operators do not announce all required bus stops and identify routes at transfer points with other routes, if the Talking Bus system is inoperable. TARTA management does not effectively monitor coach operator compliance with ADA requirements for bus stop announcements and route identification.	Within 60 days of issuance of final report

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding deficiency/ no deficiency or advisory comment	Finding(s) of Deficiency	Response Days/Date
3	Orientation Announcements	37.167(b)	Deficiency	TARTA's automated voice annunciation system is not programmed to announce destination points or intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.	Within 60 days of issuance of final report
4	Route Identification	37.167(c)	Deficiency	TARTA's automatic voice annunciator system announcements do not include each instance when two or more bus routes intersect for route identification purposes.	Within 60 days of issuance of final report
5	Training	37.173	Deficiency	TARTA management has not trained coach operators to announce all major intersections, destination points, orientation intervals, and to identify routes when two or more routes intersect if the automatic voice annunciator system is inoperable.	Within 60 days of issuance of final report

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding deficiency/ no deficiency or advisory comment	Finding(s) of Deficiency	Response Days/Date
6	<p>Maintenance of Accessible Features</p> <p>A. Maintain in Operative Condition</p> <p>B. Prompt Repair</p> <p>C. Excludes Isolated or Temporary Interruptions in Service or Access due to Maintenance or Repairs</p>	<p>37.161(a)</p> <p>37.161(b)</p> <p>37.161(c)</p>	<p>Deficiency</p> <p>No Deficiency</p> <p>No Deficiency</p>	<p>TARTA's automatic voice annunciator system and external speakers are only repaired on an as-needed basis, and neither the AVA system nor the speakers are included on its preventive maintenance checklist. In addition, the coach operators do not test the external speakers to ensure they are operational as a part of the pre-trip inspection.</p>	<p>Within 60 days of issuance of final report</p>

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding deficiency/ no deficiency or advisory comment	Finding(s) of Deficiency	Response Days/Date
7	Service Under Contract with a Private Entity (if applicable)	37.23	NA*		
8	Service Provided by Another Public Entity (if applicable)	37.21(b)	NA*		

* NA – Not Applicable

Attachment A
FTA Notification Letter

Attachment A



U.S. Department
Of Transportation
Federal Transit
Administration

Headquarters

East Building, 5th Floor, TCR
1200 New Jersey Ave., SE
Washington, D.C. 20590

September 26, 2014

Mr. James Gee
General Manager
Toledo Area Regional Transit Authority
1127 W. Central Avenue
Toledo, OH 43697-0792

Dear Mr. Gee:

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

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

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

In order that we may properly prepare for the on-site visit, we request that you provide the information outlined in the enclosure to this letter within 30 days of the date of this letter. These materials should be forwarded to:


Sue Mason
AdSTM, Inc.
6465 Skyward Court
Columbia, MD 21045
443-851-0300
sue.mason@adstm.com

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

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

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

Sincerely,



John Day
ADA Team Leader

Enclosure

cc: Marisol R. Simón, FTA Region V Administrator
Marjorie Espina, FTA Region V Civil Rights Officer
Monica McCallum, Regional Operations Division Chief

**Toledo Area Regional Transit Authority
ADA Stop Announcement Compliance Review**

Enclosure

We request that the following information be submitted to AdSTM Inc. within 30 calendar days from the date of this letter.

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

Attachment B
On-Site Review Schedule

Attachment B

Review Schedule: ADA Stop Announcements/ Route Identification - TARTA

Time	Activity	Team Members	Location
Monday, January 12, 2015			
All Day	<ul style="list-style-type: none"> Ride selected routes and record stop announcement observations and Route IDs on vehicles Record Route ID observations at transit hubs 	All review team members	Various
Tuesday, January 13, 2015			
8:00 – 9:00	<ul style="list-style-type: none"> Record Route ID observations at Park and Government Stations 	Carlson, Mecca	Downtown Transit Center
9:00 – 12:00	<ul style="list-style-type: none"> Conduct Opening Conference with FTA, TARTA, and Review Team Review policies and procedures for stop announcements and route identification Review practices for monitoring driver performance 	Larson, Mason All review team members	TARTA Offices
12:00 – 1:00	Lunch		
1:00 – 5:00	<ul style="list-style-type: none"> Discuss complaint system and policies Discuss training policies Discuss IT policies and issues Discuss maintenance policies and practices 	All review team members	TARTA offices
4:00 – 5:00	<ul style="list-style-type: none"> Conduct operator interviews at Central Garage (adjacent to TARTA administrative office) 	Carlson, Mecca	Central Garage
Evening	<ul style="list-style-type: none"> Review team meets to tabulate observations, collect data and prepare for exit conference 	All review team members	Other
Wednesday, January 14, 2015			
9:00 – 9:30	<ul style="list-style-type: none"> Pre-exit call with FTA 	FTA; Gwen Larson, AdSTM	Other
10:00 – 11:00	<ul style="list-style-type: none"> Conduct Exit Conference with TARTA 	FTA; All review team members; TARTA	TARTA offices

Attachment C
Coach Operator Interview Form

Attachment C

Fixed Route Driver Interview Form

Agency: TARTA

Driver Name _____

Date and Place of Interview

BBBBBBBBBBBBBBBBBBBBB

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 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?
Yes all the time.
 - 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 to identify the route? 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 D
Agency/Customer Contact Form

Agency/Customer Contact Form (Fixed Route Stop Announcements)

Agency Name: _____

Contact Person Name: _____

Contact Person Title: _____

Contact Person Phone Number: _____ Date of Contact: _____

Summarize comments regarding on-board stop announcements: _____

Summarize comments regarding route identification: _____

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

Recommended follow-up for review team:

Signature of FTA Contractor Completing this Form

Print Name

Attachment E
TARTA Complaint Form

Attachment E

Toledo Area Regional Transit Authority Title VI Discrimination Complaint Form

NAME (Complainant):	PHONE: ()
----------------------------	-------------------------

HOME ADDRESS (Include City, State and ZIP):	E-MAIL (If Applicable):

If applicable, name of persons who allegedly discriminated against you:

Basis of Discriminatory Action(s):

_____Race _____Color _____National Origin _____Sex _____Age _____Disability

Date of Alleged Incident:	Location and position of person(s) who alleged discriminated against you if known:
----------------------------------	-------------------------------------------------------------------------------------------

Explain briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Please attach additional pages as needed or any additional written material about your complaint.

**Toledo Area Regional Transit Authority
Title VI Discrimination Complaint Form**

What do you believe these events occurred?

What other information do you think is relevant to this complaint?

How can this issue or issues be resolved to your satisfaction?

Please list below the names, addresses, phone numbers and job titles of person(s) we may contact for additional information about your complaint (witnesses, fellow employees, supervisors, others):

NAME	ADDRESS	PHONE NUMBER	JOB TITLE

Signature:

Date:

Attachment F
Stop Announcement Observation Form
(January 12, 2015)

Attachment F

On-Board Fixed Route Stop Announcements Assessment Form

Transit agency Name _____ Date: _____

Route #/Direction/Destination _____ Vehicle Number: _____

Boarded at: _____ Disembarked at: _____

Time: _____ AM / PM Time: _____ AM

/ PM

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

Summary

	On System List						Other					
No. of Announcements	Made:			Not Made:			Made:			Not Made:		
No. of Announcements Made By	Voice:		PA:		Auto:		Voice:		PA:		Auto:	
No. of Announcements	Audible:			Not Audible:			Audible:			Not Audible:		

Notes

Signature and Name _____

Attachment G
Route Identification Observation Form
(January 12, 2015)

Attachment G

Route/Line Identification Assessment Form

Transit Agency Name: _____

Stop/Station Location: _____ Date: _____

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

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

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

Signature and Name of FTA Contractor:

Attachment H
TARTA Response to Draft Report

Attachment H

From: [James Gee](#)
To: [Heard, Anita \(FTA\)](#); tmetzger@tarta.com
Cc: [Espina, Marjorie \(FTA\)](#); [Mitchell, Yolanda CTR \(FTA\)](#)
Subject: RE: TARTA ADA Draft Report
Date: Thursday, March 26, 2015 10:17:10 AM

Ms. Heard,

We have reviewed the draft compliance review report and have found no factual errors or omissions. We are working on the follow-up items and will reply within the deadlines presented within the document.

Sincerely,

James Gee
General Manager
Toledo Area Regional Transit Authority

From: ANITA.HEARD@dot.gov [<mailto:ANITA.HEARD@dot.gov>]
Sent: Monday, March 23, 2015 2:01 PM
To: jgee@tarta.com; tmetzger@tarta.com
Cc: marjorie.espina@dot.gov; yolanda.mitchell.ctr@dot.gov
Subject: TARTA ADA Draft Report

Mr. Gee,

Thank you for the cooperation that you and your staff provided during the ADA Stop Announcement and Route Identification Compliance review conducted the week of January 12-14, 2015 of the Toledo Area Regional Transit Authority (TARTA). Attached is the draft report conducted by AdSTM. You have seven (7) days, or until March 31, 2015, to review the report for any factual misstatements or omissions. Provide all comments to anita.heard@dot.gov. Should you have any questions about the enclosed report, please contact me at (202) 493-0318.

Anita Heard
Equal Opportunity Specialist
Internal EEO Program Coordinator
Federal Transit Administration
Office of Civil Rights, TCR
1200 New Jersey Ave.
E54-420, East Bldg.
Washington, DC 20590
Phone: 202-493-0318
Fax: 202-366-3475
Follow us on