Toledo Area Regional Transit Authority (TARTA)

June 15 - 18, 2009

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

Final Report November 28, 2011

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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, and 38) 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 buses or rail systems serve 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.

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 February 3, 2009, FTA notified the Toledo Regional Transit Authority (TARTA) that a fixed route compliance 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. Thomas Procopio of TranSystems served as the review team leader. Other review team members were David Chia of Planners Collaborative and Caroline Ferris of TranSystems.

The stop announcement and route identification fieldwork began Monday, June 15, 2009, and continued into the next day with all three reviewers making observations. The following individuals participated in the opening conference:

Jim Gee	CEO/General Manager, TARTA
Larry Hyttenhore	Maintenance Supervisor, TARTA
Jerry Austin	Superintendent of Transportation, TARTA
Michael Blackston	Director of Information Services, TARTA
Bill Kelly	Planning Director, TARTA
Thomas Procopio	TranSystems Corporation
David Chia	Planners Collaborative
Caroline Ferris	TranSystems Corporation

Susan Clark of the FTA Office of Civil Rights in Washington, DC participated in the opening conference via telephone. Ms. Clark began by thanking TARTA for its assistance with the review. She noted that the review team had been on site since Monday, June 15, 2009. Ms. Clark explained that FTA's on-board announcements reviews include providing each transit property with a general timeframe for the compliance review, the review team would then make initial observations, notify the transit system and subsequently request an opening conference.

This process was used to ensure that the field observations of stop and route announcements would not be influenced by the grantee knowing when the review team was on site.

Ms. Clark emphasized that the primary purpose of the review was to ensure compliance with ADA requirements. She also noted that the review team had significant experience with ADA fixed route operations and encouraged TARTA to utilize the review team for ADA technical assistance as well. TARTA was informed that preliminary findings and an opportunity to respond would be provided on June 18, 2009 at the exit conference. Ms. Clark encouraged TARTA to ask questions about the preliminary findings and seek recommendations for addressing any issues that were identified.

Mr. Gee asked if corrective measures made by TARTA between the time of the site visit and the time the draft report is released will be reflected in the report. Ms. Clark responded that corrective measures implemented prior to the release of the draft report would be included in the final report. The final report would then be posted on the Civil Rights page of the FTA website. Mr. Chia added that findings related to TARTA's compliance would require a response and accompanying corrective action.

Mr. Procopio summarized the activities of the review team from the previous two days. These activities included field observations of stop and route announcements that were conducted while aboard TARTA bus routes; and waiting at stops used by multiple bus routes and observing route identification patterns. Mr. Procopio then presented a proposed schedule to meeting with TARTA on Wednesday and Thursday. Attachment B includes a copy of the review team's site visit schedule.

During the remainder of that day, review team members met with various TARTA senior staff members. The review team gathered information about policies and procedures for stop announcements and route announcements, maintenance of public address (PA) systems, vehicle operator training, operator performance monitoring, and operator discipline.

On Thursday the review team finished gathering data from the field observations and prepared preliminary findings for presentation at the exit conference that afternoon. The following individuals were present during the exit conference:

Jim Gee	CEO/General Manager, TARTA
Jerry Austin	Superintendent of Transportation, TARTA
Michael Blackston	Director of Information Services, TARTA
Bill Kelly	Planning Director, TARTA
Caroline Ferris	TranSystems Corporation
Thomas Procopio	TranSystems Corporation
David Chia	Planners Collaborative

Susan Clark participated in the exit conference via telephone. Ms. Clark began the exit conference by thanking TARTA staff members for their cooperation and assistance during the review. She indicated that a draft report would be prepared and forwarded to TARTA for their review and comment. TARTA's comments would then be incorporated into a final report. Ms. Clark stated that once the report became a final document, it would be posted on FTA's web site.

Ms. Clark noted that the draft report would contain findings as well as recommendations. The findings related to compliance need to be addressed in writing by TARTA and the recommendations are be included for TARTA's consideration and should be taken into in

account when correcting the noted deficiencies—findings. Since the process of finalizing the report would take several months, Ms. Clark encouraged TARTA to begin addressing those findings presented at the exit conference.

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

TARTA received a copy of the draft report for review and response. A copy of the correspondence received from TARTA on February 2, 2011, documenting its response to the draft report is included as Attachment C.

1.2 Organization of the Report

This report summarizes the observations and findings of the TARTA ADA Fixed Route Stop Announcements and Route Identification on site review. Chapter 2 recapitulates all findings sited by the review team. Chapter 3 describes TARTA's efforts to comply with the regulations, including written policies and procedures, operator training, monitoring efforts, equipment, and equipment maintenance procedures. Chapter 4 presents the review team's observations, analysis, and findings related to on-board stop announcement performance. Chapter 5 includes observations, analysis, and findings regarding route identification performance.

1.3 Overview of TARTA

TARTA was created in 1971 and at the time of the review had over 40 routes in and around the Toledo, OH metropolitan area. The service area includes Lucas County and the communities of Toledo, Maumee, Ottawa Hills, Perrysburg, Rossford, Spencer Township, Sylvania, Sylvania Township, and Waterville. According to the 2007 National Transit Database (NTD), the Toledo urbanized area is just over 200 square miles with approximately 500,000 people. TARTA serves approximately 426,000 people in 149 square miles.

TARTA provides a range of services including fixed route services including: general dial-a-ride service in suburban areas, ADA complementary paratransit (TARPS), and a system of park-and-ride lots. Funding for the services is primarily from a 2.5-mil property tax levy on its member communities; the levy makes up 55 percent of its operating funds. Federal assistance and fares each make up an additional 20 percent of operating funds and the remaining five percent of operating funds come from the State of Ohio and other sources.

The fixed route bus fare is $1 per trip with a discount fare of 50 cents available to persons 65 and older and persons with disabilities. Weekly passes are available for $10 ($5 for older adults and persons with disabilities). A monthly pass is available for $40.

TARTA directly operates fixed route and public dial-a-ride services from of one garage located at 1127 West Central Avenue in Toledo. According to the 2007 NTD agency profile, TARTA provided 5.7 million trips in that year.

TARTA has designated 11 transfer points for its bus routes. The major transfer points are located in the Central Business District, collectively called "The Loop." The Loop has four stations and all routes stop at each station. Printed schedules indicate the first time point for each run.

The other designated transfer points are:

- University of Toledo (UT) Main Campus and UT Scott Park Campus
- UT Health Science Campus and Southland
- Lakeside Center and Alexis Road Meijer
- Westfield Franklin Park
- Westgate
- Southwyck and Arrowhead Park
- Miracle Mile

The fixed route fleet is comprised of 154 buses. Of these, 77 are equipped with a public address system. These vehicles range in age from 10–18 years and have eight internal speakers and one external speaker. The remainder of the fleet, 77 vehicles, is equipped with the "Talking Bus" automatic announcement system, manufactured by Digital Recorders, Inc. These vehicles range in age from 1–6 years and all have one external speaker and 4-8 internal speakers.

In spring 2009, TARTA conducted a comprehensive operations analysis. The analysis made a number of recommendations regarding funding and services. The major recommendations from the analysis were:

- Replace The Loop with a single hub system in downtown Toledo and add additional cross-town routes to enable passengers to avoid having to come into downtown to transfer
- Merge the suburban dial-a-ride services to facilitate transportation to adjoining communities
- Repeal the existing property tax levy and replace it with a 0.5 percent sales tax in all of Lucas County, and Perrysburg and Rossford in Wood County to allow service expansion into new areas of Lucas County

At the time of the FTA review, TARTA managers indicated that they plan to begin work on these and other recommendations outlined in the operations analysis as soon as possible.

1.4 Rider Input

Input from transit riders, particularly those who rely on stop announcements and route identification, can be helpful in conducting reviews. Such input assists reviewers in identifying specific problem areas to be addressed during the course of the review. In addition, the input provides anecdotal support for observations made by the reviewers and conclusions drawn from the reviewers' analyses. The review team gathered consumer input from three sources: (1) formal complaints on file with FTA, (2) consumer and agency representative interviews, and (3) TARTA's customer comment/complaint records.

Formal Complaints

At the time of the review, there were no formal ADA complaints on file with FTA regarding TARTA's e fixed route service.

Agency and Rider Comments

Prior to the site visit, the review team attempted to conduct telephone interviews with individuals who use the TARTA services or agencies that serve persons with disabilities who use the service. The agencies contacted included:

- Ability Center of Greater Toledo
- Site Center of Northwest Ohio
- Bureau of Vocational Rehabilitation and Services for the Visually Impaired
- Lucas County Board of Mental Retardation
- LOTT Industries
- Epilepsy Foundation
- Lutheran Blind Mission/Toledo Outreach Center

In spite of significant outreach efforts, the review team was only able to speak with one person with a visual or cognitive disability who was familiar with TARTA's fixed route service. Most clients of the agencies contacted use TARTA's ADA complementary paratransit service (TARPS) rather than fixed route service. On the basis of a single consumer interview, the review team found it difficult to assert that this interview provided an accurate depiction of how the riding-public viewed TARTA service, with regard to stop announcements and route identification.

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 an ADA compliance issue does not exist. Findings shall 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 are detailed in Chapters 3 through 5.

2.1 Stop Announcements and Route Identification Requirements

1. While TARTA informs its operators of the regulatory requirement to announce stops, observations made during the site visit indicate that there is not enough emphasis placed upon enforcing the requirements.

2. TARTA does not have a policy and explicit procedure for operators to follow when making orientation announcements.

3. TARTA's complaint process did not meet the requirements of Part 27 of the DOT ADA Regulations. The complaint records prior to February 2009 were not made available to the review team. TARTA did not appear to have a process in place for accepting written complaints from riders. TARTA keeps a full copy of a complaint in the driver's personnel file if disciplinary action takes place, but discards the initial complaint form if there is no such action.

4. TARTA must routinely monitor stop announcement compliance. TARTA has failed to perform this task consistently. Since 2009, TARTA has participated in "Ghost Rider" monitoring arranged through the Ohio Transit Risk Pool, which includes, but does not emphasize, stop announcement and route identification compliance. In the past TARTA also used college students for "secret shopper" on-board observations, but not in 2009.

5. For buses not equipped with the Talking Bus system—or when the Talking Bus system is not working properly, operators are expected to announce the same set of stops that are on the stop lists developed for Talking Bus. However, TARTA does not provide its operators the complete list of stops that they are expected to announce for each bus route.

6. The mechanics that maintain the Talking Bus system, speakers and microphones do not have a maintenance information system (MIS) to record and track the work that they perform. The vehicle maintenance department does have a vehicle maintenance MIS; however, this MIS includes neither the work performed by the IS specialists, nor the maintenance history of the vehicles' electronic components overseen by IS.

7. The most recent comprehensive review of the Talking Bus units was completed in October 2009. The Talking Bus units are not included in any preventative maintenance schedule.

2.2 On-Board Stop Announcement Performance

1. Overall stop announcement performance needs significant improvement. Of the 42 TARTA bus route segments observed by the review team, 14.3 percent (six) had 80 percent or more of the required stop announcements made. Another 19 percent (eight) had between 66.7 and 80 percent of the required announcements made, while 66.7 percent (28) had a smaller proportion of the required announcements made. For 33.3 percent (14) of the observations, no required announcement was made.

2. Performance was particularly poor on buses not equipped with Talking Bus. Reviewers rode 11 route segments on buses without the Talking Bus system. The best performance on any of these 11 segments was only 42.9 percent. There were no announcements on eight of these 11 segments.

3. Operators did not take the responsibility for making announcements when they were operating a bus with a nonfunctioning Talking Bus system. Six of the 31 bus route segments on buses equipped with Talking Bus had no automated announcements; another four segments on buses with the Talking Bus had between one and five automated announcements. For only one of these 10 segments did the vehicle operator make any additional announcements.

2.3 Vehicle/Route Identification Performance

1. TARTA does not have an explicit procedure for making external route identifications.

2. The performance was particularly poor for buses that did not have the Talking Bus system; there was only one route identification announcement out of 40 observations: a performance ratio of 2.5 percent.

3 Stop Announcement and Route Identification Compliance Efforts

Sections 37.167 (b) and (c) of the DOT ADA regulations require stop announcements for passengers on transit vehicles and identification of transit routes to individuals waiting at stops. This chapter contains an analysis of TARTA's efforts to ensure that operators announce stops and identify routes to fixed route bus and trolley customers. The review included:

- TARTA policies and procedures
- TARTA operator training practices and written materials
- TARTA monitoring and disciplinary procedures

Prior to the site visit, the review team received written information from TARTA on its policies and procedures for stop announcements and route identification. TARTA also provided copies of its operator bulletins concerning stop announcements.

3.1 Policies and Procedures

TARTA Stop Announcement and Route Identification Standards

TARTA's on-board stop announcement policy is included in the fixed route operator manual. This manual is distributed to all operators. The memorandum (*Bulletin 0-853*, dated November 12, 1991) discusses the regulations that affect fixed route service. Attachment D contains all TARTA memoranda and bulletins cited in this chapter.

The memorandum includes a section concerning the requirements for stop announcements stating:

> On fixed route systems the operator shall announce stops as follows:
>
> a. The operator 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 impairments or other disabilities to be oriented to their location. Major intersections and intervals for our purpose will be understood to be the downtown loop stations and intersections with traffic signal lights throughout the system.
>
> b. The operator shall announce any stop on request of an individual with a disability.
>
> c. Where more than one route serves the same stop the operator shall identify which route he/she is operating on for the benefit of persons with a visual or other impairment who might be seeking to ride on a particular route.

In January 1992, TARTA issued follow-up bulletin (Bulletin 0-860) reinforcing stop announcement requirements for The Loop stations and major intersections. The policy is generally consistent with the requirement to call out stops at transfer points, major intersections, and intervals along the route to orient riders to their location. TARTA provided evidence of additional stop announcement policies that serve as reminders for operators. The first notice, dated July 9, 2007, dealt with the automated announcement system. Operators were reminded

that the law requires stop announcements to be made and that "operators must activate the Talking Bus feature if the unit is equipped with the feature." This was followed by a memorandum (September 19, 2007) with instructions on how to log into the Talking Bus feature. According to TARTA staff, these notices were re-posted on the bulletin board in the operators' lounge on February 13, 2009.

TARTA uses automated and manual procedures to comply with the requirements for stop announcements and route identification (ID) announcements. Buses purchased since 1999 are equipped with the Talking Bus in addition to the PA system.

Buses purchased prior to 1998 have internal and external speakers but do not have the Talking Bus system. On these buses, operators must make the stop and route ID announcements orally, with or without the public address (PA) system.

Selection of Stops to be Announced

In FTA's experience, the definitions of a "major intersection" a destination point and sufficient intervals for orientation should be determined by the transit system in consultation with the disability community. Orientation announcements are generally needed at least every few minutes in urban areas, and more frequently when routes change direction, in order to satisfy the DOT ADA regulatory requirements.

TARTA developed lists of stops to be announced for each route (and route variation) for the outbound (away from The Loop) and inbound directions. TARTA began developing these lists in 1999 when it first obtained buses equipped with the Talking Bus system. A TARTA committee composed of the administrative manager, planning manager (now the General Manager) and operators selected the stops to be announced for each route. According to the General Manager, TARTA based its selections on the requirements in the DOT regulations and for "key destinations" based on actual travel patterns of the riders. However, at the time of the review, TARTA did not provide its operators the complete list of stops that they are expected to announce for each bus route.

At the time of the review, TARTA's planning department was responsible for reviewing and updating the stop announcement data, which it provides to the information systems (IS) department. The IS staff transfers the data to the Talking Bus units on each bus. All Talking Bus units have the data for all routes.

TARTA's policy states that major intersections (defined by TARTA as intersections with traffic lights) and destination points are to be included in the stop announcements. However, the stop lists provided to the review team (and review team observations) indicated that certain major destinations and intersections with traffic lights are not announced. For example, when riding the following Talking Bus-equipped routes, the review team noted the following:

- During observations on Route 5 (Dorr) outbound, no intersections were announced from the time the vehicle departed Promenade Station (one of the stations in The Loop) until the vehicle crossed Collingsworth Boulevard on Dorr Street, a distance of two miles. The next intersection that was announced was Dorr Street at Detroit Avenue (a time point), which is 1.2 miles from Collingsworth and Dorr.

- Route 13 (Starr) outbound and Route 14 (East Broadway) inbound both travel along Main Street in East Toledo. During observations on Route 13, the intersections of Main and Front and Main and Second were announced. The next intersection announced was

Main and Starr, while no announcements were made at the intermediate intersections of Main and Fourth and Main and Sixth Streets. On Route 14 inbound, the intersections of Main and Starr, Main and Fourth, and Main and Front were announced, while the intersections of Main and Sixth and Main and Second were not.

- Route 31G (Glendale/Southwyck) travels to the Toledo Zoo, Toledo Commons Shopping Center, and the University of Toledo Health Campus. During on-board observations, none of these destinations were announced.

Route Identification Announcements

The Talking Bus system also provides the external route ID announcements. The route ID announcements are made via the external speaker at every stop where the operator opens the door. The announcement is made whether one route or multiple routes serve the stop.

For buses not equipped with the Talking Bus system—or when the Talking Bus system is not working properly—operators are expected to announce the same set of stops that are on the stop lists developed for Talking Bus. There is no explicit procedure for operators making route ID announcements.

3.2 Operator Training

Proper training is essential for implementing a successful stop and route identification announcement program. Training to proficiency, relevant to job function, is an ADA regulatory requirement (49 CFR § 37.173), as noted in Chapter 1.

The review team met with TARTA's Superintendent of Transportation, who is responsible for new operator training, to discuss how stop announcement and route identification information is incorporated into operator training. Copies of training materials and the training syllabus were also obtained and examined.

All new vehicle operators at TARTA receive 24 days of training. The optimum number of trainees per class is 5–8 individuals, although classes have been conducted for as few as 2–3 individuals and as many as 11–12 individuals at one time. One full day of this training is dedicated to customer service and ADA issues. This includes general customer service skills, ADA requirements, and disability awareness. Requirements related to stop announcements and route identification, and instructions for meeting these requirements, are covered in this portion of the training.

Stop announcement and route identification requirements and procedures are covered in an "ADA Training Module." TARTA obtained this module and other training materials from the Transportation Safety Institute. Relevant pages of this module are provided in Attachment E. Page ten of the ADA module notes,

Bus operators are required under the ADA regulation to announce stops. Although you may think this is not necessary because you do not have a blind customer on board, you may not know if you have cognitively-impaired customers who cannot read, or a sight-impaired person with seriously degraded fields of vision on board. The material indicates that operators should announce:

- All four stations in The Loop
- Major intersections

- Any stops requested by customers

It also reminds operators to:

- Announce stops loudly and clearly
- Check PA during pre-trip inspection

Page 12 of the "Customers with Visual Impairments" module tells operators:

> If you see a person with a white cane or guide dog or suspect that a person waiting at a bus stop is blind, follow these tips:

- Place the bus slowly and properly in the bus stop
- Park close to the curb and look for hazards
- Announce your route and destination
- Use your voice to help guide the customer to the door
- Ask able body passengers to move from priority seating
- Ask blind persons where they would like to alight
- Announce stops
- Verbally guide them to an empty seat
- When there is already a guide dog onboard, let boarding blind persons know there is currently a guide dog on board. Let it be their decision if they wish to board.

This section reiterates the TARTA stop announcement policy that requires operators to announce**:**

- All five stations in The Loop
- All major intersections
- Any stop requested by the customer

The training materials indicate that "Talking Bus makes these announcements for you," which may lead to the mistaken impression that all buses in the TARTA fleet are equipped with the technology and that operators are not responsible for making sure that all stops required by the ADA are announced.

The wording on page 12 is ambiguous and seemingly implies that route identification announcements are needed only when the operator sees a customer who is blind or has a vision disability. Limiting external announcements in this manner could potentially exclude some customers with disabilities. Furthermore, external route announcements are intended to provide access for people with other types of disabilities and are required by the DOT ADA regulations on all stops serving multiple routes. This requirement is needed independent of operator's observance of an apparent disability.

The training materials do not describe the Talking Bus function which automatically makes on-board stop announcements and external route identification announcements; neither does it differentiate the operator's responsibility when the Talking Bus technology is not properly functioning.

The training material directs operators to use the PA system if available. During the on-site review all buses in the TARTA fleet were equipped with microphones.

On pages 16 and 17 of the module is a list of vehicle operator guidelines addressing ADA compliance and service to older adults and people with disabilities with disabilities. One of the guidelines states:

> You are required to announce bus stops and transfer points from inside the bus. Outside your bus, you must announce your route number at bus stops and transfer points.

The TARTA Operator Training program's ADA section appears to contain the necessary information for fixed route operators. It includes an overview of the ADA, provides information on interacting appropriately with persons with various disabilities, provides tips on dealing with persons with disabilities, and includes a summary of guidelines for operators to follow.

After the completion of the ADA module, operators are required to sign a receipt indicating that they have "received, read, and understand the ADA module." The signed receipt is placed in the operator's personnel file. The review team evaluated the personnel files for the 30 most recently hired operators. Signed receipts were found in 27 out of the 30 files reviewed. The review team believes that the lack of a signed receipt for ADA training does not indicate that the operators in question did not go through that part of the training, but rather that the three missing receipts are likely a clerical error.

All operators are required to go through quarterly refresher training in addition to the initial training given upon hire. The refresher training lasts 1–1.5 hours and may cover any one of a number of operator related topics. At the time of the review, the most recent refresher training occurred the week of April 20, 2009 and dealt with wheelchair securement and stop announcements. At the end of a refresher training session, a "retraining receipt" is signed by each participant and placed in their respective personnel files.

The review team reviewed the personnel files of the 30 most recently hired operators and found the refresher training receipt in 28 out of the 30 files.

Remedial training, as stipulated by the collective bargaining agreement, may also be provided.

While TARTA informs its operators of the regulatory requirement to announce stops, the review team's findings indicate that there is insufficient emphasis placed on enforcing the regulatory requirement to make stop announcements and route identification. Failure to make the necessary stop or route identification announcements were not included in the list of infractions with consequences. This lack of consequences is possibly evidence of lack of enforcement.

As noted in Chapter 1, the review team interviewed nine TARTA fixed route vehicle operators. Five of the nine operators interviewed specifically mentioned the refresher training provided in April 2009. Three operators mentioned that recent training was very helpful in providing guidance on ADA requirements, with specific regard to making stop announcements. One operator indicated he was told to try to announce all stops, while another indicated that the April training was the first time any guidance on ADA issues was provided.

3.3 TARTA Complaint Handling-Process

The DOT ADA regulations require public transit providers to receive complaints from riders, resolve them promptly and equitably and to keep copies of complaints on file for one year and maintain a summary of complaints on file for five years (49 CFR 27.13(b) and 27.121(b)). While requirements to respond to complainants are not included in the DOT ADA regulations, it

is a common and effective practice for a transit provider to respond to complainants and for transit providers to investigate allegations to ensure that all DOT ADA requirements are being met.

Complaint Policies and Procedures

Customers wishing to file a complaint may do so by calling the TARTA "RIDE line," at 419-245-5205, a special complaint line posted on the TARTA web site. They can also submit a complaint via e-mail at info@TARTA.com. At the time of the review, there did not appear to be a process in place for receiving written complaints from the public. TARTA staff stated that most complaints are filed via RIDE line because consumers are familiar with the mode of communication. TARTA collects complaint information gathered through RIDE line by taking handwritten messages or transferring the complainant's call to the Assistant to the Superintendent of Transportation (Assistant), or her voicemail. The Assistant tries to obtain the following information from the complainant:

- Complainant name
- Complainant phone number
- Occurrence date, time, day of the week
- Description of complaint
- Route
- Line
- Bus number
- Direction
- Location
- Operator or badge number
- Male or female
- Approximate operator age

This information, along with the day of the week, date, and time the complaint was received is entered into a "Complaint Log" spreadsheet that acts as a complaint record database. Three additional fields in the Complaint Log are left blank (hard drive pulled, response, and date of resolution.) are entered later. Through a mail merge, the information contained in the Complaint Log is then used to generate a TARTA Complaint Form.

Once a Complaint Form is completed, the complaint is either handled by the Assistant directly or, if necessary, forwarded to the Road Supervisor for further action. TARTA tries to make initial contact with a complainant within 24 hours and to resolve all complaints within seven days.

The decision on how to handle a specific complaint is at the discretion of the Assistant. In cases where the Assistant addresses the complaint—for example, if a rider has simply requested an apology from TARTA—the Assistant generally contacts the rider by telephone or e-mail, as requested by the complainant, and tries to bring about a resolution immediately. Once this type of complaint is resolved, the Complaint Log is updated with date and manner of resolution and the paper Complaint Form is discarded.

In other cases, complaints are forwarded to the Road Supervisor for investigation. The Road Supervisor will request that the security camera hard drive record be pulled for the vehicle in question. However, the video contained on the hard drive is recorded over after three days, so if the complaint is not received within three days of the event, video verification is not possible. If the complaint is received within three days of the alleged incident, a request to pull the security camera hard drive records is attached to the TARTA Complaint Form before it is given to the Road Supervisor. The Road Supervisor then reviews the security tape if available, speaks to the operator, and investigates if necessary. The Road Supervisor then fills out an investigation summary. When the investigation summary is completed a copy is sent back to the Assistant, who is responsible for contacting the customer to communicate the resolution of the complaint. A copy of the investigation resolution is also sent to the Superintendent of Transportation for his review and information.

The Complaint Log is then updated with a response and date of resolution and, unless operator disciplinary action is required, the paper Complaint Form is discarded. Should disciplinary action be required, all complaint information is entered into disciplinary tracking software "Tiny Term" and a paper copy of the complaint in placed into the operator's personnel file.

TARTA has been tracking complaints in this manner since May 2009. From February–May 2009, Road Supervisors recorded complaints were recorded on a legal pad. Previously, complaints were tracked in an ACCESS database, which has since become inaccessible. Part 27 of the DOT ADA regulations requires TARTA to keep complaints on file for one year, and a summary of complaints received for five years. At the time of the review, TARTA's complaint process did not satisfy Part 27 requirements. Records prior to February 2009 could not be provided to the review team.

As of May 2009, TARTA had received 132 complaints, requests, or comments, none of which were related to stop announcements or route identification.

3.4 Monitoring Procedures

In addition to training, monitoring and feedback on performance are ways to measure compliance with the stop announcement and route identification requirements. For vehicle operators to succeed, they must know what is expected of them, have the necessary tools and skills to perform their jobs, and receive feedback about their performance. At the time of the review TARTA had not routinely monitored stop announcement compliance.

The January 22, 1992, bulletin indicated that frequent ride checks would be performed to verify that stops were being announced. TARTA staff indicated that road supervisors conduct street observations, but that the primary goal of those observations is to monitor on-time performance and not to measure compliance with stop announcement requirements. This process also does not include a review of external route ID announcements. An informal "secret shopper" program using local college students was used in the past to observe operator performance. There were no on-board observations conducted in this manner during 2009.

In 2009 TARTA entered into the Ghost Rider Program sponsored by the Ohio Transit Risk Pool (OTRP). This program is designed to "improve transit safety and customer service by establishing a program to exchange independent and knowledgeable feedback to operators and transit systems." A Ghost Rider is a staff member from another transit system who, by invitation, visits a participating transit system and anonymously rides on selected routes to

observe operator conduct, passenger relations, and compliance with established policies and procedures. The observation form used contains 35 areas of observations, including one labeled ADA Compliance. Attachment F includes a description of the Ghost Rider program, feedback forms, and participant roles and responsibilities.

Since the Ghost Riders are from other transit systems, their identity is not apparent to the operator being observed. The program provides for two ghost riders to visit each transit system.

The feedback provided by the Ghost Riders may be used is by the host transit system to provide positive feedback to the observed transit operators, identify individual areas for transit operator development, and/or identify gaps in the host transit agency's training program that need to be addressed. The program not designed to be used as a formal evaluation of any observed transit operator. The Ghost Riders' feedback provides the host transit system an objective look at the host transit's service from a rider's point of view.

At the time of the review, TARTA was tentatively scheduled for three Ghost Rider site visits by the end of 2009 (June, August, and October).

3.5 Operator Discipline

Corrective and disciplinary actions related to compliance with stop announcement and route identification policies are governed by TARTA's progressive discipline procedure. The collective bargaining agreement between TARTA and United Auto Workers Local 5242 recognizes the right of TARTA to take appropriate, timely disciplinary action in a progressive fashion. TARTA management and the union recognize that, depending upon the seriousness of the misconduct, one or more of the steps in the disciplinary process may be eliminated.

There is one unofficial step and five official steps in the progressive discipline process. The unofficial step in the process is called "Made Aware." This step involves the Superintendent of Operations bringing the operator in and informing the operator that he (the Superintendent of Operations) is aware of an issue or failure to follow a specific TARTA policy. The Made Aware notation is entered into the employee's personnel file. Whether or not this step is used depends upon the performance background of the particular operator. If the operator in question has no negative performance issues in their file, the Made Aware step is used before the first step of the progressive discipline.

The five official steps in the progressive discipline are:

1. **Counsel**. Session with the Superintendent of Transportation which is documented in the employee personnel file. The operator is reminded of the need to follow the appropriate policy or procedure.

2. **Verbal**. Conversation with the Superintendent of Transportation, documented by a memorandum that is placed in the personnel file

3. **Written**. More formal memorandum written to the employee stressing the seriousness of the situation and the need to improve. Copies of the memorandum are kept in the personnel file.

4. **Suspension**. Continued failure of an operator to remedy the performance issue will result in a work suspension. The length of the suspension depends upon the severity of the infraction.

5. **Termination**. If the operator fails to remedy the performance issue after all of the previous steps in the process have occurred, the result is termination

In cases where an operator has reached the Termination stage, mitigating circumstances or a request from the union may result in the operator being given a "Last Chance Agreement." A Last Chance Agreement letter stipulates that the operator has one last chance to comply in order for employment to be continued at TARTA. The agreement is effective for 12 months, at which time the Superintendent of Transportation reviews the performance of the operator. After the Superintendent of Transportation's review, one of three outcomes occurs: (1) if the performance of the operator has improved in the area covered by the agreement, TARTA retains the operator; (2) if the performance of the operator in the area covered by the agreement has not improved, the operator is terminated; and (3)I f a decision is not made about retaining or terminating the operator after the 12-month period, the Superintendent of Transportation may choose to extend the agreement an additional six months.

Upon hire, all employees are placed on a 90-day probationary period, during which the progressive discipline steps do not apply. Employees can be suspended or terminated during the probationary period without prior counseling or oral or written reminders, depending on the seriousness of the performance violation or issue.

In addition to the progressive discipline described above, TARTA has seven policies with consequences:

- Computer systems
- Cell phone use
- Smoking
- Sexual harassment
- Garnishment
- Violence in the workplace
- Accident prevention and chargeability

TARTA management considers rules violations in these categories more serious than violations in other areas. They acknowledged that violation of ADA requirements is not included in the list of policies with consequences. During the site visit, TARTA staff members said that they would consider revising this list to include compliance with ADA requirements.

In 2008, no operator was disciplined for failure to make announcements. TARTA's external ride checks focus on on-time performance. The only way that an on-board issue such as not calling stops would be initiated is if a rider files a complaint.

3.6 Stop Announcement and Route Identification Equipment

Half of TARTA's bus fleet was equipped with the Talking Bus system during the time of the on-site review. Talking Bus is a technology made by Digital Recorders, Inc., of Durham, NC. The primary component of this system is a processor installed on a bus that stores stop and route information, receives GIS data on the bus's location (usually from a connected global positioning system), and generates stop and route information to be transmitted through the bus's speakers.

There are two generations of the Talking Bus system installed on TARTA buses. Buses purchased from 1999–2005 have the DR-500C+ version, while buses purchased in 2007 (and 2009 not yet in service) have the DR-600 version. According to TARTA staff, the practical difference between the two generations is that the DR-600 can download stop and route data through a wireless signal, which allows for quicker updates. For a bus rider, there is no discernable difference.

All buses are equipped with a microphone for use by the operator. The TARTA fleet has a mix of hand-held microphones and gooseneck microphones. At the time of the review, TARTA was phasing out the gooseneck microphones. Staff indicated that they required more maintenance and that operators preferred the hand-held microphones.

Maintenance

TARTA had two mechanics that specialize in the electronic components of the buses (radios, fare boxes, cameras, microphones, speakers, and the Talking Bus systems) during the time of the on-site review. Their work is separate from the vehicle mechanics that maintain all other components of the buses. The electronic component mechanics work for the IS department.

To divide the work appropriately, the trouble report forms are in two colors, pink for electronics and beige for other vehicle problems. Attachment G presents sample trouble cards related to Talking Bus problems reported by TARTA operators.

When an operator submits a pink trouble card, one of the IS mechanics is responsible for reviewing the stated problems and diagnosing and repairing the problem. The IS mechanics do not have a maintenance information system (MIS) to record and track the work that they perform. The only record of their activities is their daily timesheet on which they record the bus number, problem, repair made, and time spent for each piece of work they perform. The vehicle maintenance department does have a vehicle maintenance MIS but the system does not include any information on the electronic components.

The most recent comprehensive review of all the Talking Bus units occurred from August–October 2008 and was performed by an IS specialist. The Talking Bus units are not included in any preventative maintenance schedule.

A review of the pink trouble cards for the two-month interval up to the time of the site visit found 11 cards (six different buses) for which operators reported a problem with the Talking Bus system. However (as discussed in Chapters 4 and 5), over the two days that review team members were recording stop announcements and route ID announcements, they recorded ten Talking Buses with an insufficient number of stop announcements. If operators were reporting these failures on the trouble cards, one would expect to see more trouble cards on file. Based on these separate observations, it appears that operators reported problems with the Talking Bus systems for only a small proportion of the instances when there was a problem, given the disparity between the number of problems observed and the number of trouble cards on file.

Bus Fleet

Table 3.1 presents TARTA's fixed route bus fleet and the type of passenger communications equipment on each type of bus. At the time of the site visit, half of the fleet (77 of 154 active buses) was equipped with the Talking Bus system. All buses had internal speakers and an external speaker. TARTA was planning to replace the 28 buses from the 200 series in late 2009.

New buses—as well as all future TARTA bus purchases—will be equipped with the Talking Bus system.

Table 3.1 – TARTA Fixed Route Fleet and Communications Equipment

Bus Series	Make, Model	Year	Active Buses	Talking Bus	Internal Speakers	External Speakers
201-246	TMC T70606	1990	28	No	6	1
300-309	Bluebird 35ULF	2005	10	DR-500 C+	6	1
310-319	Bluebird 35ULF	2007	10	DR-600	6	1
400-419	TMC T70606	1994	20	No	4	1
500-536	Thomas SLF235	2003	37	DR-500 C+	6	1
600-612	Gillig LF	1998	13	No	8	1
700-719	Gillig LF	1999	20	DR-500 C+	8	1
900-917	FLX Metro	1993	16	No	8	1
Total			**154**			
Talking Bus			**77**			

3.7 Findings

1. While TARTA informs its operators of the regulatory requirement to announce stops, observations made during the site visit indicate that there is not enough emphasis placed on enforcing the requirements

2. TARTA does not have a policy and explicit procedure for operators to follow when making route identification announcements.

3. TARTA's complaint process did not meet the requirements of Part 27 of the DOT ADA regulations. The records prior to February 2009 were not made available to the review team. TARTA did not appear to have a process in place for accepting written complaints from riders TARTA keeps a full copy of a complaint in the driver's personnel file if disciplinary action takes place but discards the original complaint form if there is no disciplinary action.

4. TARTA has not routinely monitored stop announcement compliance. In 2009, TARTA entered into "Ghost Rider" monitoring arranged through the Ohio Transit Risk Pool, which includes, but does not emphasize, stop announcement and route identification compliance. In the past TARTA had also used college students for "secret shopper" on-board observations, but not in 2009.

5. For buses not equipped with the Talking Bus system—or when the Talking Bus system is not working properly, operators are expected to announce the same set of stops that are on the stop lists developed for Talking Bus. However, TARTA does not provide its operators the complete list of stops that they are expected to announce for each bus route.

6. The mechanics that maintain the Talking Bus system, speakers and microphones do not have a maintenance information system (MIS) to record and track the work that they perform. The

vehicle maintenance department does have a vehicle maintenance MIS; however, this MIS includes neither the work performed by the IS specialists, nor the maintenance history of the vehicles' electronic components overseen by IS.

7. The most recent comprehensive review of the Talking Bus units was completed in October 2009. The Talking Bus units are not included in any preventative maintenance schedule.

3.8 Recommendations

1. In consultation with the disability community, TARTA should develop more specific criteria for which bus stops its operators are required to announce, either by using the PA system, or the Talking Bus system.

2. TARTA should develop a policy and explicit procedures for operators to follow when making route identification and orientation announcements.

3. TARTA should actively monitor its operators compliance with stop announcements and route identifications, whether through its ongoing monitoring methods or through additional monitoring.

4. TARTA, in cooperation with the union, should develop and add a policy with consequences for failing to make stop, route identification or orientation announcements.

5. TARTA must maintain copies of all complaints in a central file for at least 1 year in compliance with Part 27 of the DOT ADA requirements.

6. TARTA should maintain records—whether electronic or paper—of all maintenance work performed by its IS specialists on the buses' electronic components. It would be helpful if these records were combined with the vehicle maintenance records kept by the maintenance department.

7. TARTA should institute periodic maintenance of its Talking Bus units and other components related to communications on the vehicle.

8. TARTA should the list of stops to be announced on all routes and make this information readily available for all operators.

9. TARTA should emphasize to its operators the importance of reporting problems with Talking Bus systems.

10. Buses purchased prior to 1998 do not have the Talking Bus system. On these buses, operators must make the stop and route ID announcements themselves, with or without PA system. TARTA should reinforce to operators that they are responsible for ensuring that stop announcements are to be made on all vehicles, including and not limited to when the Talking Bus technology is not functioning possibility.

11. According to the General Manager, TARTA bases its selection of which stops to announce for each route on the requirements in the DOT regulations and for "key destinations," based on actual travel patterns by the riders. The TARTA planning department is responsible for reviewing and updating the stop announcement lists. Please consider formulating a list of additional key destination announcements.

15. A review of the pink trouble cards for the two-month interval up to the time of the site visit found 11 cards (six different buses) for which operators reported a problem with the Talking

Bus system. However (as discussed in Chapters 4 and 5), over the two days that review team members were recording stop announcements and route ID announcements, the review team recorded ten Talking Buses with an insufficient number of stop announcements. Were operators reporting these failures on the trouble cards, one would expect to see more trouble cards on file. Please consider updating your operator reporting system so that all system failures are properly recorded and resolved in a timely manner.

16. In addition to the progressive discipline, TARTA has seven "policies with consequences", actions that may lead to disciplinary action against any TARTA employee. Failure to comply with ADA requirements is not included among these seven. Consider revising "policing with consequences" to include some punitive actions for an operator's failure to make stop announcements. Also consider including these new punitive measures in your employee training manual and collective bargaining agreement.

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 TARTA's performance in making stop announcements. Included are:

- Summary of operator comments from interviews with review team members
- 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 Operator Interviews

The review team interviewed nine TARTA vehicle operators. The average length of service for these operators was 5 years, ranging from 4–9 years. At the time of the review, although there was no available list of required stop announcements, all of the operators knew that some stops are required to be announced. However, there was confusion as to which stops are required to be announced. Two operators said major intersections were required and four felt that major intersections and time points were required to be announced. One operator also felt points of interest should be announced.

All nine operators indicated that they make stop announcements when specifically requested by riders, although one operator said that it can be easy to forget to announce a stop, even when he is requested to do so.

Only two of the nine operators interviewed indicated that route identifications were required. One of these said he only made route identifications in the downtown area. The other operator said that he only sometimes announced the route.

The operators said that they were likely to get a vehicle equipped with Talking Bus at least 60 percent of the time; although most operators perceived that the Talking Bus only works correctly or works at all slightly more than half of the time. Five of the operators felt that Talking Bus had been incorrectly programmed. One operator said that the system announces the incorrect stops on the same routes and at the same stops, regardless of the vehicle used. One operator said that the stops on a particular weekend route variant were continually wrong because the stop announcements had been programmed for the weekday route variation. In cases where this happens, a few operators felt that their riders generally knew where they were and were usually amused by the incorrect announcements.

The operators thought that external route identifications made by Talking Bus were correct roughly 60 percent of the time.

Five of the nine operators said that they checked the Talking Bus and PA systems as part of their pre-trip inspection. All nine interviewees reported that they are generally required to take the vehicle they are assigned, whether or not the PA and Talking Bus systems are working, although one operator does attempt to request a different bus.

Three operators cited a recent training that was very helpful in providing guidance on ADA requirements, with specific regard to making stop announcements. Five operators said that equipment in working condition would help them adhere to requirements and one operator said that a list of required stop announcements would be very helpful. At least three operators expressed concern that requiring stop announcements puts other passengers' safety at risk, by forcing operators to take their eyes off the road to look at street signs.

4.2 Review Team Observations

On Monday and Tuesday, three review team members rode buses throughout the TARTA service area. The purpose of these observations was to determine whether the stop announcements that were made complied with the regulatory requirement to announce (at a minimum) transfer points, major intersections, and destinations, and at intervals sufficient for individuals with visual impairments to orient themselves. Review team members also judged whether stop announcements were being made in accordance with TARTA's policies.

Review team members usually sat at mid-bus (one or two rows forward of the rear door) to make observations and recorded the results on the On-Board Stop Announcements Assessment Form (Attachment H). Review team members used the printed public bus route schedules to determine the minimally required stop announcements (time points and transfer points with other TARTA bus routes). The schedules also indicated major intersecting roads and some key points of interest for each route. As they rode each segment, the reviewers used this information to record whether the on-board announcement was made for each stop. Reviewers also referred to the lists of required stop announcements for each route that TARTA provided subsequent to their on-board observation to see if there were additional stops that operators were supposed to announce.

For each stop announced, reviewers noted whether the announcement was made with or without the PA system and whether the announcement was clear and audible. Attachment I presents detailed data on the review team's observations.

The three reviewers rode 42 different route segments in all parts of the TARTA service area. A route segment may include all or part of a bus route (in one direction). The bus routes observed included TARTA local routes; reviewers did not make any observations on TARTA express routes. Reviewers rode 36 distinct route segments (inbound and outbound directions of a route considered distinct) and 34 different vehicles. Of the 42 observations, 31 segments were on buses equipped with Talking Bus and 11 were on buses without Talking Bus.

Observers boarded as early as 8 a.m. and were on buses as late as 5:20 p.m. The total time on board a bus for these observations was 19 hours, 39 minutes, with an average time per segment of 28 minutes. The time on board for a segment ranged from 13–67 minutes.

Table 4.1 presents the results of the observations. The percentages given in the table refer to each route segment as one observation. Overall, 14.3 percent (six) of the buses ridden by the reviewers had 80 percent or more of the required stop announcements made. Another 19 percent (eight) had between 66.7–80 percent of the required announcements made, while 66.7 percent

(28) had a smaller proportion of the required announcements made. In fact, for 33.3 percent (14) of the observations, there were no required announcements made (for one of these observed segments, the operator made two announcements, but none of the required announcements).

Table 4.1 – Observed On-Board Stop Announcement Performance

Announcements Made	All Observations		Talking Bus		No Talking Bus	
	Segments	Percent	Segments	Percent	Segments	Percent
80 percent or more	6	14.3%	6	19.4%	0	0
66.7–80 percent	8	19.0%	8	25.8%	0	0
Below 66.7 percent	28	66.7%	17	54.8%	11	100%
No announcement	14	33.3%	6	19.4%	8	72.7%
Total	**42**	**100%**	**31**	**100%**	**11**	**100%**

The observations identify several concerns with TARTA's performance:

- Reviewers rode 11 segments on buses without the Talking Bus system. Operator performance was very poor. For eight of the 11 segments, no announcements were made. On the three segments in which operators announced stops, the best performance was 42.9 percent.

- Six of the 31 segments via Talking Bus-equipped buses had no automated announcements and another four segments featured between one and five automated announcements. On these ten buses with inoperative Talking Bus systems, the operator made stop announcements on only one segment.

- Overall performance needs significant improvement, regardless of the availability of particular technology on a vehicle.

The review team also noted whether the stop announcements were audible from where the reviewer was sitting. Table 4.2 summarizes these observations. Audibility refers both to the clarity and the volume of the announcement.

Table 4.2 –Audibility of On-Board Stop Announcements

Method of Announcement	Observations (Calls Made)	Calls Inaudible		Mixed Audibility		Audible	
Talking Bus	278	3	1.1%	20	7.2%	255	91.7%
Voice	11	4	36.4%	2	18.2%	5	45.5%
PA	1	0	0.0%	0	0.0%		100.0%
Total	**290**	**7**	**2.4%**	**22**	**7.6%**	**261**	**90.0%**

The automated Talking Bus system made the vast majority of the stop announcements while the reviewers were riding: 95.9 percent (278) of the total 290 stop announcements used the Talking Bus. Reviewers judged 91.7 percent (255) of the 278 to be audible. Another 7.2 percent (20) were of mixed audibility.   This meant that the reviewer could understand the stop announcement

in part because he or she was anticipating that announcement. The other 1.1 percent (3) of announcements made by the Talking Bus system were considered inaudible.

There were 11 stop announcements made by voice without use of the PA system. Five of these were audible, four were inaudible, and two were of mixed audibility

The one announcement made with the use of the bus's PA was judged to be audible.

Announcements were made with sufficient time for a passenger to alight at the desired stop.

The review team noted a lack of orientation announcements.

4.3 Findings

1. Overall stop announcement performance needs significant improvement. Of the 42 TARTA bus route segments observed by the review team, 14.3 percent (six) had 80 percent or more of the required stop announcements made. Another 19 percent (eight) had between 66.7 and 80 percent of the required announcements made, while 66.7 percent (28) had a smaller proportion of the required announcements made. For 33.3 percent (14) of the observations, no required announcement was made.

2. Performance was particularly poor on buses not equipped with Talking Bus. Reviewers rode 11 route segments on buses without the Talking Bus system. The best performance on any of these 11 segments was only 42.9 percent. There were no announcements on eight of these 11 segments.

3. Operators did not take the responsibility for making announcements when they were driving a bus with the Talking Bus system, but the system was not working. Six of the 31 bus route segments on buses equipped with Talking Bus had no automated announcements; another four segments on buses with the Talking Bus had between one and five automated announcements. For only one of these 10 segments did the vehicle operator make any additional announcements.

4.4 Recommendations

1. Five of the nine operators said that they checked the Talking Bus and PA systems as part of their pre-trip inspection even though TARTA requires operators to perform these checks. TARTA should reinforce the requirement for full compliance with the ADA regulations on stop announcements for its operators. This could include operator bulletins, providing stop lists to operators, discussion at safety meetings, and training of new operators.

2. TARTA must enforce the requirement for operators to perform pre-trip inspections of the Talking Bus system and PA system and to report problems to the maintenance personnel.

3. TARTA must reinforce the need for operators to make stop announcements if the Talking Bus system is not working on their bus.

4. TARTA should particularly focus on buses without the Talking Bus system and buses for which the system is not working properly when monitoring compliance with stop announcement requirements.

5. TARTA should encourage operators to use the public address system when making announcements rather than relying on their unamplified voices.

6. Among all bus route segments, reviewers recorded 290 stop announcements made either by voice, by PA, or by the Talking Bus system. Reviewers judged that 90 percent of these announcements were audible. Another 7.6 percent were of mixed audibility. Please consider frequent operator refresher training with an emphasis on stop announcements and route identifications.

7. There were 11 stop announcements made by voice without use of the public address (PA) system. Five of these were audible, four were inaudible, and two were of mixed audibility. The one announcement made with the use of the bus's PA was judged to be audible from mid-bus. Please consider documenting steps to ensure Talking Bus external speakers are working properly.

5 Vehicle/Route Identification Performance

Section 37.167(c) of the DOT ADA regulations related to the identification of fixed route services 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 vehicle operator as a person seeking a ride on a particular route.

This chapter addresses TARTA's efforts to implement the requirement to identify bus routes to customers waiting at stops shared by more than one route. This chapter includes:

- A summary of operator comments from interviews with on-site review team members
- A description of the review team's method for reviewing route identification efforts
- A summary of information collected and observations made regarding route identification

5.1 Vehicle Operator Interviews

As noted in Chapter 4, only two of the nine operators interviewed indicated that route identification announcements were required. One of those operators indicated that he made route identifications in the downtown area, while the other said he sometimes announces the route. The operators interviewed felt that the external route identifications made by the talking bus were correct about two-thirds of the time.

5.2 Review Team Observations

The review team conducted 159 observations of external route identification announcements. The Route Identification Review Form is presented in Attachment J. Most of these observations were made at one of the four stops in The Loop: Government (18), Park (36), Promenade (41), or Seagate (31). Reviewers also made route ID observations at Monroe and Superior in downtown (14), the University of Toledo Transit Center (12), Westfield Franklin Park (6), and on Secor at Central (1). These observations tool place on June 15–16, 2009.

Reviewers waiting at the stop listened to determine if a route identification announcement was made, either by the Talking Bus system or by the operator, as the bus pulled into the stop. Each bus arriving at the stop where a reviewer was stationed was recorded and counted as a single observation. As shown in Table 5.1, reviewers heard 39 external route identification announcements, yielding a performance ratio of 24.5 percent.

As shown in Table 5.1, performance was particularly poor for buses that did not have the Talking Bus system. There was only one route identification announcement out of 41 observations. Performance for buses equipped with the Talking Bus system was 31.9 percent (38 of 119).

Table 5.1 – Observed Route Identification Announcement Performance

Bus Type	Total Observations	Route ID Announcement Made		No Route ID Announcement
Talking Bus	119	38	31.9%	81
No Talking Bus	40	1	2.5%	39
TOTAL	**159**	**39**	**24.5%**	**120**

Attachment K presents the full set of route ID announcement data.

5.3 Findings

1. The performance was particularly poor for buses that did not have the Talking Bus system; there was only one route identification announcement out of 40 observations—a performance ratio of 2.5 percent.

5.4 Recommendations

1. TARTA should reinforce the need to perform external route identification announcements as part of compliance with the DOT ADA regulations. This could include operator bulletins, discussions at safety meetings, and training of new operators.

2. Operators should be aware that they are required to make route identification announcements by voice—either with or without the external speaker—at all stops served by multiple routes if they have a bus without the Talking Bus system or if the Talking Bus system is not working properly.

3. TARTA should monitor compliance with the requirement for external announcements.

4. Review team members observed 39 route identification announcements from 159 observations at bus stops served by more than one route: a performance ratio of 24.5 percent. Please be mindful that TARTA operators must be prepared and willing to make announcements as necessary despite automated announcement systems. Please consider frequent operator refresher training with a special emphasis on stop announcements and route identifications.

Attachment A

FTA Notification Letter

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

February 3, 2009

Jim Gee
Toledo Area Regional Transit Authority
1127 West Central Ave.
P.O. Box 792
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, 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. Toledo Area Regional Transit Authority
(TARTA) has been selected for such a review.

The focus of the review will be TARTA'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 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 4 days. FTA has engaged the services of Planners Collaborative, Inc.
(PCI) of Boston, 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 May 22, 2009 and
the next 120 days, although we do not provide the actual date ahead of time because of the nature
of the observation.

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 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 TARTA 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 John Day, Acting ADA Team Leader, at 202-366-1671 or at his e-mail address: *john.day@dot.gov.* You may also contact Mr. Chia, at the contact information listed 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 N. Hershey
Director
FTA Office of Civil Rights

Enclosure

cc: Marisol Simon, FTA Region V Administrator
       Dwight Sinks, FTA Region V Civil Rights Officer
       Dominick J. Gatto, FTA Region V Director of Program Management & Oversight

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 Los Angeles Metro 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

On-Site Review Schedule

ADA Stop Announcements Review
TARTA
June 15 through June 18, 2009

Time	Activity	Who	Where
	Monday June 15, 2009		
All Day	Ride selected routes and record stop announcements. Check for external announcements at transfer points	All	On TARTA Buses
	Tuesday June 16, 2009		
All Day	Ride selected routes and record stop announcements. Check for external announcements at transfer points	All	On TARTA Buses
Afternoon	Call TARTA(call Jim Gee, General Manager) to arrange meetings on Wednesday and Thursday	Procopio	419-243-7433
	Wednesday June 17, 2009		
9:00	Opening Meeting	All	1127 West Central Ave
9:30	Review complaint process/customer complaints	Ferris	1127 West Central Ave
9:30:00 to 12:00 PM	Review policies and procedures for stop announcements and route identification. Review policies and procedures for monitoring driver performance with TARTA staff	Procopio, Chia	1127 West Central Ave
1:00	Driver Interviews	Ferris	1127 West Central Ave
1:00	Driver Interviews	Chia	1127 West Central Ave
1:00	Meet with trainer(s) to discuss driver training and discipline. Review driver observations	Procopio	1127 West Central Ave
2:00	Meet with vehicle/system maintenance manager to review maintenance procedures and records for PA and talking bus systems	Chia	1127 West Central Ave
	Thursday June 18, 2009		
8:00	Team meeting to tabulate observations and prepare for exit conference	All	1127 West Central Ave
2:00	Exit Conference	All	1127 West Central Ave

Attachment C

TARTA Response to Draft Report

TARTA

Toledo Area Regional Transit Authority
1127 West Central Avenue, P.O. Box 792
Toledo, Ohio 43697-0792
(419) 243-7433 – Phone
(419) 243-8588 – fax
www.TARTA.com

March 8, 2011

Ms. Cheryl L. Hershey
Director
FTA Office of Civil Rights
East Building, 5th Floor, TCR
1200 New Jersey Ave., S.E.
Washington, D.C. 20590

RECEIVED IN TCR
2011 MAR 21 A 9: 40

Dear Ms. Hershey:

Thank you for the opportunity to review the draft report created as a result of the ADA compliance review initiated in June, 2009. I have reviewed the report and the accompanying table listing corrective issues.

Attached is a copy of the table provided by FTA to be used to outline deficiencies and corrective actions. Please use me as the agency contact for any follow up issues. Per your request, I will make sure that all necessary actions are taken to ensure full compliance.

All of us at TARTA appreciate the approach and assistance shown by the representatives from Planners Collaborative, Inc. and TranSystems Corp. in conducting this latest review.

Sincerely,

James K. Gee
General Manager

Enclosure

cc: Erick Allen, FTA Region V Equal Opportunity Specialist (by email)
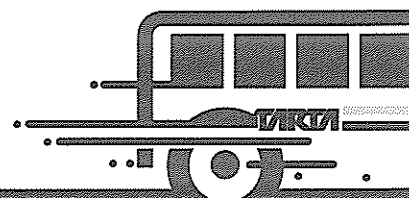
Attachment D

**Documentation of TARTA Policies and Procedures
Regarding Stop Announcements and Route Identification**

BULLETIN: O-853   NOTE: Check your mailbox for your individual copy

TO: ALL OPERATORS

FROM: J. M. Stewart

DATE: November 12, 1991

SUBJECT: AMERICANS WITH DISABILITIES ACT OF 1990

The American with Disabilities Act of 1990 (ADA) is a Federal law that guar-
antees the Civil rights of people with disabilities in access to the normal
activities of communication, and transportation. As various sections take
effect over the next few years, many changes will occur that impact the lives
of people with disabilities and the services provided to them. People with
disabilities will be fully integrated into activities and services and will no
longer be forced to accept segregated (and often sub-standard) services and
opportunities.

Since the ADA is civil rights legislaltion and we, individually and collec-
tively, can be the subject of investigations and penalties for failing to
comply, you should know what is expected of you.

The regulations which most directly affect us at this time are:

1.   A system of regular and frequent checks of lifts sufficient
     to determine if they are operative shall be established.
     Hence, the directive to deploy your lift before leaving the
     property and shortly after making relief.

2.   Bus operators shall report the failure of a lift by the
     most immediate means available (Radio the dispatcher or
     notify the garage personnel).

3.   All common wheelchairs and their users, and mobility devices
     shall be transported. (A common wheelchair is defined as one
     which is 30 or less inches wide, 48 or less inches long and
     no more than 600 pounds loaded.) You are not required to per-
     mit persons in wheelchairs to ride in other than designated
     securement areas in the vehicle where such areas exist.

4. When necessary, or upon request, the operator **shall assist** individuals with disabilities with the use of securement systems and lifts. If it is necessary for the operator to leave his/her seat to provide this assistance he/she shall do so.

5. The operator **may not deny transportation** to a wheelchair or its user on the ground that the device cannot be secured or restrained satisfactorily.

6. The operator **shall permit individuals with disabilities who do not use wheelchairs, including standees, to use a vehicle's lift.**

7. On fixed route systems the operator shall announce stops as follows:

   a. The operator **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. Major intersections and intervals for our purpose will be understood to be the downtown loop stations and intersections with traffic signal lights throughout the system.

   b. The operator shall **announce any stop on request** of an individual with a disability.

   c. Where more than one route serves the same stop the operator shall identify which route he/she is operating on for the benefit of persons with a visual or other impairment who might be seeking a ride on a particular route.

8. The operator shall permit service animals to accompany individuals with disabilities on the bus. They include both "seeing eye" dogs and "help" dogs.

9. The operator **shall not prohibit** a passenger traveling with a respirator or portable oxygen supply, consistent with applicable Department of Transportation rules on the transportation of hazardous materials.

10. The operator **shall ensure** that adequate time is provided to allow individuals with disabilities to complete boarding or disembarking from the vehicle.

Once again, because these regulations are Federal law we have no choice but to comply.

JMS:se

BULLETIN: 0-860

TO: ALL OPERATORS

FROM: J. M. Stewart

DATE: January 22, 1992

SUBJECT: ADA Requirements

As mentioned in a previous communique, the American with Disabilities Act (ADA) sets forth numerous requirements with which public transit must comply. One requirement is that the lift on each bus must be cycled through before leaving the garage and/or after making relief. This applies whether or not the bus is assigned to a lift equipped run. Another important requirment is that all operators call out the loop stations and major intersections. (For our purposes this will be where major traffic signals are present.)

The Authority is obligated to make a good faith effort to be in compliance. To this end, supervision will make periodic checks to see that the lifts are being cycled during A.M. and P.M. pull outs. Also we will be doing frequent ride checks to see that the stops are being called out.

Please remember the ADA is a federal civil rights law, not simply a TARTA regulation. Failure to comply can result in more than disciplinary action by the Authority against an operator. A citizen can actually bring legal action against the individual operator as well as the Authority.

JMS:se

TARTA

MEMORANDUM   (Reposted February 13th, 2009)

TO: All Operators

FROM: G. R. Austin, Superintendent of Transportation

DATE: July 9th, 2007

SUBJECT: ADA REQUIREMENTS

Recently it has been noted that the TALKING BUS feature was not activated or was inoperable on some buses.

Operators must activate the TALKING BUS feature if the unit is equipped with this feature. Should you find the feature to be out of order or your bus not equipped with this feature the operator is required by law to make announcements to the passengers at the stops in the CBD, major locations on the route, intersections and points of interest.

Operators are also required to notify dispatch should a sight impaired patron request them to advise the unit that they need to be alert to the location and pick them up.

Should you have any questions or concerns contact any dispatcher or me.

Violations of these rules will result in disciplinary action.

MEMORANDUM   (Reposted February 13th, 2009)

TO: All Operators

FROM: G. R. Austin, Superintendent of Transportation

DATE: September 19th, 2007

SUBJECT: TALKING BUS

To better comply with ADA requirements and to address complaints recently received from sight impaired passengers that the "Talking Bus" feature was not functioning on some buses, listed below are the procedures that should be followed when logging on to the "Talking Bus".

1. Start your bus.
2. Wait for a prompt to enter "A" code.
3. Enter the sign code.
4. Press enter.

To set "B" code,
1. Press "B" button.
2. Enter sign code.
3. Press enter.

To change the sign from "A" to "B" or reverse, just push "A" or "B" and enter.

Should you find any routes or buses inoperable notify dispatch and they will forward the information to me.

Attachment E

TARTA Training Materials Related to Stop Announcements and Route Identification

ANNOUNCE STOPS

Bus operators are required under the ADA regulation to announce stops. Although you may think this is not necessary because you do not have a blind customer on board, you may not know if you have cognitively- impaired customers who cannot read, or a sight- impaired person with seriously degraded fields of vision on board.

Items to remember:

- Announce stops loudly and clearly;
- Check PA or Talking bus during your pre-trip inspection, before leaving the terminal;
- Announce stations in the loop, and major intersections.

Notes:

_____

_____

_____

_____

_____

_____

_____

_____

CUSTOMERS WITH VISUAL IMPAIRMENTS

If you see a person with a white cane or guide dog or suspect that a person waiting at a bus stop is blind follow these tips:

- Place the bus slowly and properly in the bus stop;

- Park close to the curb and look for hazards;

- Announce your route and destination;

- Use your voice to help guide the customer to the door;

- Ask able body passengers to move from priority seating;

- Ask blind persons where they would like to alight;

- Announce stops;

- Verbally guide them to an empty seat;

- When there is already a guide dog onboard, let boarding blind persons know there is currently a guide dog on board. Let it be their decision if they wish to board.

TARTA requires the operator to announce all:

All five stations in the loop

Major intersections

Any stop requested by the customer

Talking Bus makes these announcements for you.

Use the PA system if available.

ADA SUMMARY: BUS OPERATOR GUIDELINES

- You must provide the same service to a customer with a disability as provided to able-bodied customers.

- You cannot require a person with a disability to travel with an attendant. A customer with a disability is allowed to have one attendant, for whom no fare is charged.

- You cannot require customers with disabilities to use priority seating or able-bodied customers to move.

- Wheelchair lifts and ramps must be cycled before you leave the garage or as soon as practical if you relieve downtown. You are required to check the operation of the lift or ramp and securement devices.

- Whenever a person with disabilities must be delayed in their travel, it must be reported to the dispatcher.

- You are required to ensure that the wheelchair is secured.

- You may recommend that the customer transfer from the wheelchair or 3-wheeled scooter to a normal seat, but cannot require it.

- You are required to provided assistance, including securing a wheelchair and storing a walker or crutches.

- You are required to allow customers with disabilities to use the lift or ramp.

- Customers with disabilities may board the lift facing either direction (Follow lift manufacturer's recommendations).

- Seat belts and shoulder harnesses must be provided to customers in wheelchairs, but you cannot require the customer to use them.

- You are required to announce bus stops and transfer points from inside the bus. Outside your bus, you must announce your route number at bus stops and transfer points.

ADA SUMMARY: BUS OPERATOR GUIDELINES (CONT.)

- You are required to use all accessibility equipment, including the PA system, if the bus is so equipped.

- Customers with respiratory conditions that require oxygen may bring the oxygen cart aboard and it must be secured.

- You are required to give customers with disabilities more time to board and alight.

- You must permit service animals to board the bus.

- You must be trained in issues relating to disability awareness and sensitivity, and customer assistance techniques.

Attachment F

Ohio Transit Risk Pool Ghost Rider Program

Ohio Transit Risk Pool

OTRP

Ghost Ride Form

Transit Operator_____   Date_____

Vehicle #_____   Start Time_____

Boarding Loc_____   End Time_____

Alighting Loc_____   Route #_____

Score: 3-Exceeds Expectations, 2-Meets Expectations, 1-Needs Improvement

#	Score	Driving Skills	#	Score	Misc/Passenger Relations
1		Smooth accelerations	21		Courteous to motorists/peds
2		Smooth stopping/complete stops	22		ADA compliance*
3		Smooth steady speed	23		On time/schedule – (early or late)
4		Turns*	24		Break time selection
5		Bus Stops*	25		Climate control
6		Lane use*	26		Proper uniform*
7		Mirror use (checks every 5-8 sec)	27		Radio use
8		Intersection awareness*	28		Pre-trip inspection/route turnover*
9		Defensive driving skills (proper distance)	29		Proper body mechanics*
10		Steering control & hand position	30		Proper fare & transfer procedures
11		Railroad crossings*	31		Consistent adherence to policy/procedures
12		Road scan	32		Passenger relations*
13		Yields right-of-way*	33		Bus interior*
14		Vehicle securement*	34		Operator personal habits*
15		Obeys traffic signs/signals*	35		Occasional extra activities*
16		Speed control*	36		Proper wheelchair securement
17		Cushion of safety/safety zone			
18		Stopping distance			
19		Wears seatbelt			
20		Door operation			

Comments: (If you rate the operator a three or a one an explanation is required)

General Experience/Comments:

Signatures:

_____	_____
Ghost Rider	Ghost Rider Program Coordinator

*Information Sheet

Item 4 – Turns: Square turns, Smoothness, Checks mirrors, Proper Distance from curb/lane placement

Item 5 – Bus Stops: Merging, Curb Alignment, Safe Stop Selection, Flashers and Turn Signals, Allows Passengers to reach safe place before accelerating

Item 6 – Lane Use: Proper position in lane, Choice of proper lane, Avoids unnecessary lane changes, Lane change, Stops, Canceling, Maintains lane, Turn signal use

Item 8 – Intersection Awareness: Checks intersection before entering, Correct response to traffic control, Yields to non-motorized traffic (pedestrians, bikes, etc.)

Item 11 – Railroad Crossings: Approaches with Caution, Activates Flashers 100ft prior, Stopping distance from tracks, Makes complete stops at tracks

Item 13 – Yields Right-Of-Way: Courteous to other drivers, Pullouts, In motion

Item 14 – Vehicle Securement: Brake set, Neutral, Doors

Item 15 – Obeys traffic Signs/Signals: Crosswalks

Item 16 – Speed Control: Safe speed fro conditions, Speed on curves & corners, Complies with posted speed limit

Item 22 – ADA Compliance: Announce time points prior to and at bus stop with sufficient interval to orient visually impaired to their location, Stop announcements interior and exterior, Use of designated seating, Service animal management, Proper use of Wheelchair lift and Kneeler

Item 26 – Proper Uniform: Presents neat, clean appearance, Name badge

Item 28 – Pre-trip Inspection/Route Turnover: Walks around bus before taking over, Mirrors, Checks interior for lost and found or damage, Destination signs appropriate

Item 29 - Proper Body Mechanics: Seat adjustment, Steering wheel adjustment

Item 32 – Passenger relations: Courteous and polite, Gives accurate information, Schedules available on bus, Keeps conversations to a minimum, Maintains "order" on the bus, Handles passenger problems appropriately

Item 33 – Bus Interior: Clean free of debris in aisle, Driver compartment free of clutter, Wheelchair securements stowed away

Item 34 – Operator Personal Habits: Drinking/eating, Cell phone, Smoking, Personal items onboard, AM/FM/CD use, Negativity towards other personnel or system verbalized

Item 35 – Occasional/Extra Activities: Bicycle loading/unloading, Flag stop selection and pullout safety, Smoking, Animals, Strollers

OTRP Ohio Transit Risk Pool

Transit System Feedback Form

Ghost Ride Dates: _____

Vehicle #s: _____

Boarding Locations: _____

Alighting Locations: _____

Route #s: _____

Mark (x) the category(s) for which comments are provided.

#	Comment		#	Comment	
1		Bus Stops*	4		Basic Routing*
2		Schedules*	5		Bus Conditions*
3		Customer Service*	6		Transfer Center*

Comments: The following are specific comments for categories marked above. Comments are made when a category (or areas within a category) exceeded the Ghost Riders' expectations or was noted to need improvement.

General Experience/Comments:

Signatures:

_____   _____
            Ghost Rider   Program Coordinator

*Information Sheet

Item 1 – Bus Stops: Lighting, Safety, Cleanliness, Signage, Security (personal safety-how customer feels), Access, Amenities *(each comment for this section **must** include location & time of day)*

Item 2 – Schedules: Readily Available, Easy to Use, Up to Date, Fare Information (basics), Information on Priority Seating, Route Maps

Item 3 – Customer Service: Polite, Informative, Assistance with General Questions (sightseeing, points of interest), Helpful, *(each comment for this section **must** include location & time of day)*

Item 4 – Basic Routing: Points of Interest, Ease of Transfers, Timeliness as it Relates to Transfers & Routes, Essential/Common Destinations (medical facilities, library, social services)

Item 5 – Bus Conditions: Cleanliness (inside & out), Grab Rails Secure and easy to Notice, Equipment (serviceability), Environment (noise, temperature), Signage for Priority Seating, Fare Information Posted, *(each comment for this section **must** include Vehicle# & time of day)*

Item 6 – Transfer Center: Self Directing and/or Safe Path of Travel, Fare Information, Posted Timetable, Clock, Cleanliness, Safety, Security (personal safety- how customer feels), System Map, Restrooms, Personnel, *(each comment for this section **must** include name of transit center & time of day)*

GHOST RIDER PROGRAM
PARTICIPANTS' ROLES AND RESPONSIBILITIES

The host transit agency will:

- Schedule the Ghost Rides (dates and times).
- Identify and prepare Program Coordinators for host and Ghost rider transit agencies.
- Select routes to be observed:
    · Specify time-efficient routes;
    · Identify routes providing maximum access to operators/all routes;
    · Explain route lengths and one-way routes;
    · Arrange for Ghost Riders' transportation to move between routes when necessary;
    · Identify suitable locations for Ghost Riders' comfort breaks and meals;
    · Identify methods to "catch-up" if a Ghost Rider gets behind.
- Explain the Ghost Rider Program to host transit agency operators and stakeholders prior to Ghost Rider visit.
- Provide a contact person and emergency contact number for the Ghost Riders throughout their visit.
- Explain procedures to follow if a host transit operator detects a Ghost Rider, (i.e., the Ghost Rider will contact the Host Transit Agency's Program Coordinator).
- Provide Ghost Riders with information regarding their personal accommodation needs, such as nearby hotels, restaurants, transit locations, etc.
- Determine the most typical fare-pay format (pass, cash) for any given route. (Fares may be provided by the Host Transit or Ghost Riders may request reimbursement for fares as part of WSTIP's travel reimbursement).
- Notify Ghost Riders of any special circumstances or activities during their visit that may affect route performance, such as festivals, fairs, or school holidays.
- Notify Ghost Riders of any variations in routes/operators' availability between weekend and weekdays visits.
- Provide strategies to Ghost Riders on how to blend in among the riders on any given route in order to avoid detection by the operator and riders.
- Provide Ghost Riders with "Host Packet." Host Packet may include: System Description, Drivers & Routes, Schedules, Sign-up Sheets, and Run Cuts.

The Ghost Riders will:

- Contact the Host Transit Agency's Ghost Rider Program Coordinator a minimum of two weeks prior to visit to set-up logistics and Ghost Rides schedule.
- Work with the host transit agency to:
    · Select time-efficient routes;
    · Select random routes providing maximum access to operators/all routes;
    · Ask for clarification as needed, including lengths of routes and one-way routes;
    · Establish options for "catching up," and breaks;

- Identify how the host transit agency will address their transportation needs between routes.
- Obtain "Host Packet" which may include System Description, Operators & Routes, Schedules, Sign-up Sheets, and Run Cuts.

- Complete a "Ghost Ride Form" for each operator observed.
- Complete a "Ghost Rider Transit System Feedback Form."
- Communicate with the Host Transit Agency's Ghost Rider Program Coordinator throughout the visit and alert them to any emergencies or emerging issues observed.
- Contact the Host Transit Agency's Ghost Rider Program Coordinator if a transit operator has recognized them.
- Ask the Host Transit Agency's Ghost Rider Program Coordinator for guidance regarding logistical needs such as hotel accommodations, transit locations, etc.
- Pay using the fare format the Host Transit Agency Ghost Rider Program Coordinator has identified for each route.
- Discuss with Host Transit Agency's Ghost Rider Program Coordinator any strategies for blending in among the riders of any given route, and use convincing "props" such as newspaper, book, note pads, schedules, appropriate attire, etc.
- Submit completed Ghost Rider forms to own transit agency's Ghost Rider Program Coordinator within one week of any given ride. The Coordinator will forward the Ghost Rider forms to the Host Transit Agency's Ghost Rider Program Coordinator.

The Ghost Riders' Transit Agency's Ghost Rider Program Coordinator will:

- Work with the Ghost Riders and the Ghost Riders' transit agency to establish dates and times for Ghost Rides.
- Obtain the name and contact information of the Host Transit Agency's Ghost Rider Program Coordinator for the Ghost Rider to arrange logistics.
- Obtain signed, confidential agreements for each Ghost Rider.
- Review submitted Ghost Rider forms for completeness and understanding, and sign.
- Submit forms to the Host Transit Agency's Ghost Rider Program Coordinator within 10 business days of the Ghost Ride.

GHOST RIDER PROGRAM SUMMARY

Purpose

The purpose of the Ghost Rider Program is to improve transit safety and customer service by establishing a program to exchange independent and knowledgeable feedback to operators and transit systems. The Ghost Rider Program is sponsored by Ohio Transit Risk Pool (OTRP).

What does the Ghost Rider Program provide?

The Ghost Rider Program provides a framework and guidelines for transit agencies to exchange experienced, knowledgeable staff that can observe and provide feedback on individual operators and the entire transit system's performance. Individual transit agencies commit to OTRP to provide knowledgeable experienced staff to serve as Ghost Riders. Each transit agency involved in the Ghost Rider Program will participate in Ghost Rides two times a year.

What is a Ghost Rider?

Ghost Riders are seasoned, high-performing transit staff members who, by invitation only, visit participating host transit agencies to anonymously observe the driving safety, passenger relations, and host transit system performance and practices. Each transit agency provides two Ghost Riders. The Ghost Riders are specially trained to participate in the program, including how to:

- Complete Ghost Rider Feedback Forms (sample attached);
- Complete the Ghost Rider Transit System Feedback Form (sample attached);
- How to best conduct Ghost Rides to provide valuable information to the host transit agency;
- Fulfill host and donor transit agencies roles and responsibilities (sample attached).

How are host transit agency operators and routes selected for observation?

The Ghost Riders work with the host transit agency to identify which routes provide the maximum opportunity to observe as much of the host transit system as possible in a two-day period.

How is Feedback Provided?

Each Ghost Rider completes a Ghost Rider Feedback Form for each transit operator observed. The form includes two categories for observation (driving skills and passenger relations), which include 35 areas of observation. Examples include turning practices, lane use, defensive driving, ADA compliance,

time/schedule, fares and passenger relations.   In addition to individual route and transit operator feedback, the Ghost Riders provide general feedback of his/her experience using the transit system on a Transit System Feedback Form. The form includes six areas of observation, bus stops, schedules, customer service, basic routing, bus conditions and transfer centers. The Ghost Riders forward their completed forms to their home transit agency's Ghost Rider Program Coordinator, who then forwards them to the host transit agency.

How does the host transit agency use the feedback they receive from the Ghost Riders?

How the feedback provided by the Ghost Riders is used is at the sole discretion of the host transit agency, with one exception: it is not to be used as a formal evaluation of any observed transit operator. The Ghost Ride feedback can be used to provide positive feedback to the observed transit operators, identify individual areas for transit operator development, and/or identify gaps in the host transit agency's training program that need to be addressed. The Ghost Riders' feedback provides the host transit agency an objective look at the host transit's service from a regular rider's point of view. If a Ghost Rider observes any safety issues that require immediate attention by the host transit agency, the Ghost Rider must inform the Host Transit Agency's Program Coordinator at their first opportunity.

How are costs covered in the Ghost Rider Program?

Participating agencies pay the salaries of their selected Ghost Riders to provide service in the assigned transit agency. Even though this is an initial resource use, each transit will receive the same or similar benefit of another Ghost Rider's observations. OTRP will reimburse participating agencies for the cost of travel, lodging, and other miscellaneous expenses for their Ghost Riders.

Are there any additional benefits to participating transits in the Ghost Ride Program?

Yes. Ghost Riders obtain valuable information and best practices that can be taken back to their home transit agency.

Attachment G

Sample "Trouble Cards" Noting Talking Bus Problems

Radio, Fare Box, Camera, and Talking Bus Trouble Report

Bus No. 530   Badge No. 736

Date: 5-11-09   Time In: 4:52 p.m.

Trouble: Talking Bus does not accept codes.

TARTA – 48

Radio, Fare Box, Camera, and Talking Bus Trouble Report

Bus No. 711   Badge No. 713

Date: 6·12·09   Time In: 11:35 p.m.

Trouble:

Talking Bus Announces 22 m Route, inb/and outb/ with wrong coordinates.

TARTA – 48

Radio, Fare Box, Camera, and Talking Bus Trouble Report

Bus No. 505   Badge No. 2012

Date: 6/16/09   Time In: 6:36 pm

Trouble: Talking Bus does not Work.

TARTA – 48

Radio, Fare Box, Camera, and Talking Bus Trouble Report

Bus No. 7_
Date: 6-1-09
Badge No. 713
Time In: 5:51 pm

Trouble:

Talking Bus Feature Does Not Work.

TARTA - 48

Radio, Fare Box, Camera, and Talking Bus Trouble Report

Bus No. 714
Date: 15 JUNE 09
Badge No. 1597
Time In: —

Trouble:

TALKING BUS DOES NOT WORK

TARTA - 48

Radio, Fare Box, Camera, and Talking Bus Trouble Report

Bus No. 520
Badge No. 1046
Date: 6-12-09
Time In: 9:20 A.M.

Trouble: TALKING BUS NEEDS TO BE RE-PROGRAMMED, #3 LINE DOES NOT GO TO POINT PLACE OR PERRYSBURG ANYMORE. ALSO IT RANDOMLY ANNOUNCES STOPS THAT ARE NO WHERE NEAR THE LOCATION YOU ARE AT.

TARTA - 48

Attachment H

On-Board Stop Announcement Assessment Form

On-Board Fixed Route Stop Announcements Assessment Form

Transit System Name: _____TARTA_____ Date: _____

Route #/Line Name: _____ Bus or Car #_____

Boarded at: _____ Disembarked at: _____

Time: _____ AM / PM   Time: _____ AM / PM

List stops that should be announced (transfer points, orientation, major destinations). Source: _____	Check (✓) If On System List	On-Board Announce. Made?		Method of Announcement			Audible?	
		Yes	No	Voice	PA	Auto	Yes	No

Summary: **On System List**   **Other**

# of Announcements: ___Made   ___Not Made   ___Made   ___Not Made

# of Announcements Made By: ___Voice ___PA ___Auto   ___Voice ___PA ___Auto

# of Announcements: ___Audible ___Not Audible   ___Audible ___Not Audible

Notes:_____

_____

_____

Signature and Name: _____

Attachment I

Stop Announcements Observations

FTA Stop Announcement Observations of TARTA
15-16 June 2009

Date	Route	Bus	Takling Bus	Boarding Time	Location	Alight Time	Location	Total Time Observed	Stops Announced Auto	Voice	PA	Total	Not announced System List	Other	Total	Audible	Mixed	Inaudible	% Announced
6/16/2009	34	303		13:13	U Toledo Health Sci Cent	13:34	Park Station	0:21		2		2	11		11	1		1	15.4%
6/16/2009	31G	307		14:40	Southland Mall	15:15	Monroe & Superior	0:35	9			9	2	6	8	9			52.9%
6/16/2009	26D	310		11:20	Park Station	11:55	Miracle Mile	0:35	4			4	17	1	18	4			18.2%
6/15/2009	17E	311		16:40	Miracle Mile	17:20	Seagate	0:40	15	1		16	7		7	13	3		69.6%
6/15/2009	5	312		10:05	Dorr & City Park	10:20	Seagate	0:15	3			3	6	1	7	3			30.0%
6/15/2009	26L	314		15:27	Park Station	16:05	Miracle Mile	0:38	9			9	12	1	13	8		1	40.9%
6/16/2009	28	314		9:40	Park Station	9:54	Indiana & City Park	0:14				0	12		12				0.0%
6/16/2009	2M	403	n	13:40	Seagate	14:00	Westfield Park Mall	0:20				0	13	6	19				0.0%
6/16/2009	34K	407	n	8:03	Monroe & Huron	8:27	Detroit & Glendale	0:24		1		1	11	2	13	1			7.1%
6/15/2009	31H	408	n	8:00	Seagate	8:15	Detroit & Glendale	0:15		3		3	4		4	1	1	1	42.9%
6/15/2009	31G	408	n	8:50	Glendale & Detroit	9:16	Seagate	0:26		2		2	5		5	2			28.6%
6/16/2009	2M	408	n	10:25	Westfield Park Mall	11:01	Park Station	0:36				0	12	6	18				0.0%
6/15/2009	2C	416	n	9:42	Monroe & Whiteford	9:50	Westfield Park Mall	0:08				0	3	1	4				0.0%
6/15/2009	32R	505		14:50	Seagate	15:39	Southwyck & Cheyenne	0:49	17			17	5		5	17			77.3%
6/15/2009	20T	506		12:10	Government Station	12:45	Westfield Park Mall	0:35	16			16	5	3	8	8	6	2	66.7%
6/15/2009	30	510		11:43	U Toledo Scott Park	12:02	Park Station	0:19	12			12	2	1	3	12			80.0%
6/15/2009	20T	511		13:12	Government Station	13:49	Central & Secor	0:37	17			17	1	1	2	12	3	2	89.5%
6/16/2009	5R	511		8:15	Park Station	8:37	U Toledo Transit Center	0:22	9			9		5	5	9			64.3%
6/16/2009	5R	511		9:26	U Toledo Transit Center	9:53	Seagate	0:27	11			11		2	2	11			84.6%
6/15/2009	14	512		15:02	Starr & East Broadway	15:18	Government Station	0:16	5			5		7	7	5			41.7%
6/15/2009	13	514		13:46	Promenade Station	14:29	Starr & East Broadway	0:43	8			8	1		1	8			88.9%
6/15/2009	2M	516		14:25	Westfield Park Mall	14:59	Park Station	0:34				0	12	6	18				0.0%
6/15/2009	12	520		11:00	Seagate	11:20	Wheeling & York	0:20	7			7	3	1	4	7			63.6%
6/15/2009	12	520		12:28	York & Whelling	12:42	Seagate	0:14	1			1	4	1	5		1		16.7%
6/16/2009	3	525		12:33	U Toledo Transit Center	12:55	U Toledo Health Sci Cente	0:22	7			7	1	1	2	7			77.8%
6/15/2009	27N	533		16:06	Southwyck & Cheyenne	16:52	Park Station	0:46	14			14	5	1	6	12	2		70.0%
6/15/2009	39M	535		8:36	Seagate	9:07	Monroe & Whiteford	0:31				0	11	3	14				0.0%
6/16/2009	17E	600	n	14:49	Lagrange & Manhattan	15:02	Promenade Station	0:13				0	7		7				0.0%
6/16/2009	2M	600	n	16:00	Westfield Park Mall	16:35	Seagate	0:35				0	14	6	20				0.0%
6/16/2009	17E	602	n	12:35	Miracle Mile	13:07	Seagate	0:32				0	20	2	22				0.0%
6/16/2009	16C	611	n	13:59	Park Station	14:24	Chestnut & Manhattan	0:25				0	10	1	11				0.0%
6/15/2009	22F	705		10:04	Westfield Park Mall	11:11	Government Station	1:07				0	23	6	29				0.0%
6/16/2009	19F	706		9:00	Promenade Station	9:37	Westfield Park Mall	0:37	18		1	19	6	2	8	19			70.4%
6/15/2009	30	708		11:01	Park Station	11:33	U Toledo Scott Park	0:32	14	2		16	1	2	3	14	2		84.2%
6/15/2009	24	710		13:53	Secor & Central	14:25	Seagate	0:32	20			20	1		1	16	4		95.2%
6/16/2009	5	710		10:56	Seagate	11:14	U Toledo Transit Center	0:18				0	7		7				0.0%
6/16/2009	15A	713		10:42	Seagate	11:20	Alexis Meijer	0:38	18			18	2	3	5	18			78.3%
6/16/2009	15A	713		11:40	Alexis Meijer	12:10	Seagate	0:30	15			15	5		5	15			75.0%
6/16/2009	34H	906	n	8:53	Detroit & Glendale	9:11	Park Station	0:18				0	11	2	13				0.0%
6/15/2009	11			8:49	Park Station	9:05	East Broadway & Oakdale	0:16	8			8	2	3	5	8			61.5%
6/15/2009	14			9:58	East Broadway & Oakdal	10:15	Seagate	0:17	9			9	3	5	8	9			52.9%
6/16/2009	31G			13:17	Park Station	13:44	Southland Mall	0:27	12			12	4	3	7	12			63.2%

Attachment J

Route Identification Review Form

Vehicle/Passenger Identification Review Form

Transit System Name: __TARTA_____

Stop/Station Location: _____   Date: _____

Record of External Announcements or Other Method of Vehicle/Passenger Identification:

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: "_____"

7. Bus or Car #_____   Route #:_____
    Time: _____   Vehicle/Run Announced?   ☐ YES   ☐ NO
    Announcement: "_____"

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

_____

_____

Signature and Name:_____

Attachment K

Route Identification Observations

TARTA External Route Identification Observations

Location	Date	Time	Bus No.	Route	Announced?
Government Station	15-Jun-09	1:04 PM	414	17E	n
Government Station	15-Jun-09	1:05 PM	701	2M	n
Government Station	15-Jun-09	1:07 PM	706	19F	n
Government Station	15-Jun-09	1:11 PM	713	22M	n
Government Station	15-Jun-09	1:12 PM	511	20T	n
Secor at Central	15-Jun-09	1:53 PM	710	24	n
Seagate Station	15-Jun-09	2:33 PM	602	28	n
Seagate Station	15-Jun-09	2:33 PM	509	30	y
Seagate Station	15-Jun-09	2:34 PM	309?	15A	n
Seagate Station	15-Jun-09	2:36 PM	701	17B	n
Seagate Station	15-Jun-09	2:37 PM	317	34	n
Seagate Station	15-Jun-09	2:46 PM	713	22F	y
Seagate Station	15-Jun-09	2:47 PM	511	22M	y
Park Station	15-Jun-09	4:55 PM	416	2C	n
Park Station	15-Jun-09	4:57 PM	303	14	y
Park Station	15-Jun-09	4:59 PM	701	17E	n
Park Station	15-Jun-09	5:01 PM	533	16C	n
Park Station	15-Jun-09	5:02 PM	901	7	n
Park Station	15-Jun-09	5:04 PM	611	13	n
Park Station	15-Jun-09	5:05 PM	711	19	y
Park Station	15-Jun-09	5:05 PM	411	42	y
U Toledo Transit Center	16-Jun-09	11:23 AM	312	5F	n
U Toledo Transit Center	16-Jun-09	11:35 AM	311	5	y
U Toledo Transit Center	16-Jun-09	11:41 AM	525	3 north	y
U Toledo Transit Center	16-Jun-09	12:12 PM	312	5	n
U Toledo Transit Center	16-Jun-09	12:23 PM	511	5F	n
U Toledo Transit Center	16-Jun-09	12:32 PM	710	5R	n
U Toledo Transit Center	16-Jun-09	12:33 PM	525	3 south	n
Promenade	15-Jun-09	8:00 AM	611	611	n
Promenade	15-Jun-09	8:01 AM	701	2M	n
Promenade	15-Jun-09	8:02 AM	408	31H	n
Promenade	15-Jun-09	8:03 AM	515	2C	n
Promenade	15-Jun-09	8:04 AM	510	28	n
Promenade	15-Jun-09	8:04 AM	514	13	n
Promenade	15-Jun-09	8:05 AM	414	7E	n
Promenade	15-Jun-09	8:10 AM	704	34K	n
Promenade	15-Jun-09	8:10 AM	701	2M	n
Promenade	15-Jun-09	8:11 AM	517	20T	y
Promenade	15-Jun-09	8:16 AM	536	31G	y
Promenade	15-Jun-09	8:17 AM	507	32H	n
Promenade	15-Jun-09	8:18 AM		5R	n
Promenade	15-Jun-09	1:29 PM	302	31G	y
Promenade	15-Jun-09	1:29 PM	401	27N	n
Promenade	15-Jun-09	1:33 PM	516	2M	y
Promenade	15-Jun-09	1:33 PM	612	16C	n
Promenade	15-Jun-09	1:33 PM	311	17B	n
Promenade	15-Jun-09	1:33 PM		28	n
Promenade	15-Jun-09	1:35 PM	317	34B	n
Seagate Station	15-Jun-09	10:34 AM	414	7B	n
Seagate Station	15-Jun-09	10:36 AM	317	34	n
Seagate Station	15-Jun-09	10:37 AM	700	15A	y
Seagate Station	15-Jun-09	10:39 AM	509	30	y
Seagate Station	15-Jun-09	10:40 AM		28	n
Seagate Station	15-Jun-09	10:43 AM	506	20M	n
Seagate Station	15-Jun-09	10:43 AM	303	11	y
Seagate Station	15-Jun-09	10:45 AM	514	13	n
Seagate Station	15-Jun-09	10:47 AM	83	31	n

TARTA External Route Identification Observations

Location	Date	Time	Bus No.	Route	Announced?
Seagate Station	15-Jun-09	10:49 AM	701	2M	n
Seagate Station	15-Jun-09	10:49 AM	719	22F	y
Seagate Station	15-Jun-09	10:50 AM	610	Sylvania	n
Seagate Station	15-Jun-09	10:50 AM	505	32R	n
Government Station	15-Jun-09	3:24 PM	533	27N	n
Government Station	15-Jun-09	3:26 PM	313	16K	y
Government Station	15-Jun-09	3:26 PM	535	31G	n
Government Station	15-Jun-09	3:32 PM	414	7B	n
Government Station	15-Jun-09	3:32 PM	700	15E	n
Government Station	15-Jun-09	3:33 PM	602	28	n
Government Station	15-Jun-09	3:34 PM	509	30	n
Government Station	15-Jun-09	3:35 PM	317	34	n
Government Station	15-Jun-09	3:36 PM	314	26D	y
Government Station	15-Jun-09	3:40 PM	701	2M	n
Government Station	15-Jun-09	3:42 PM	303	11	y
Government Station	15-Jun-09	3:42 PM	705	22F	n
Government Station	15-Jun-09	3:47 PM	710	24	y
Park Station	16-Jun-09	7:51 AM	524	26L	n
Park Station	16-Jun-09	7:54 AM	900	24T	n
Park Station	16-Jun-09	7:57 AM	235	12	n
Park Station	16-Jun-09	8:00 AM	304	28	y
Park Station	16-Jun-09	12:28 PM	510	24	n
Park Station	16-Jun-09	12:30 PM	714	19S	n
Park Station	16-Jun-09	12:31 PM	403	17B	n
Park Station	16-Jun-09	12:32 PM	515	30	n
Park Station	16-Jun-09	12:34 PM	314	28	n
Park Station	16-Jun-09	12:35 PM		2M	n
Park Station	16-Jun-09	12:38 PM	303	34	n
Park Station	16-Jun-09	12:38 PM	311	11	n
Park Station	16-Jun-09	12:38 PM	403	17B	n
Park Station	16-Jun-09	12:41 PM	413	31H	n
Monroe and Superior	16-Jun-09	3:12 PM	501	32H	n
Monroe and Superior	16-Jun-09	3:13 PM		2M	n
Monroe and Superior	16-Jun-09	3:14 PM	532	14	n
Monroe and Superior	16-Jun-09	3:18 PM	609	27	n
Monroe and Superior	16-Jun-09	3:18 PM	506	20T	n
Monroe and Superior	16-Jun-09	3:21 PM	713	15E	n
Monroe and Superior	16-Jun-09	3:21 PM	708	22M	n
Monroe and Superior	16-Jun-09	3:24 PM	705	31G	y
Monroe and Superior	16-Jun-09	3:28 PM	528	27N	n
Monroe and Superior	16-Jun-09	3:33 PM	303	34	n
Monroe and Superior	16-Jun-09	3:34 PM		2M	n
Monroe and Superior	16-Jun-09	3:34 PM	610	19	n
Monroe and Superior	16-Jun-09	3:36 PM	311	11	n
Monroe and Superior	16-Jun-09	3:38 PM	515	30	n
U Toledo Transit Center	16-Jun-09	8:39 AM	205	3 north	n
U Toledo Transit Center	16-Jun-09	8:50 AM	710	5	n
U Toledo Transit Center	16-Jun-09	9:30 AM	312	5	y
U Toledo Transit Center	16-Jun-09	9:20 AM	525	3 south	n
U Toledo Transit Center	16-Jun-09	9:29 AM	511	5	y
Promenade	16-Jun-09	8:24 AM	510	24	y
Promenade	16-Jun-09	8:31 AM	520	13	n
Promenade	16-Jun-09	8:31 AM	714	19T	n
Promenade	16-Jun-09	8:35 AM	504	16K	n
Promenade	16-Jun-09	8:35 AM	408	17B	n
Promenade	16-Jun-09	8:37 AM	517	15B	y
Promenade	16-Jun-09	8:37 AM	522	39M	y

TARTA External Route Identification Observations

Location	Date	Time	Bus No.	Route	Announced?
Promenade	16-Jun-09	8:39 AM	515	30	y
Promenade	16-Jun-09	8:40 AM	303	34	y
Promenade	16-Jun-09	8:41 AM	314	28	n
Promenade	16-Jun-09	8:41 AM	403	2M	n
Promenade	16-Jun-09	8:46 AM	603	20	n
Promenade	16-Jun-09	8:46 AM	531	32R	n
Promenade	16-Jun-09	8:47 AM	312	5	y
Promenade	16-Jun-09	8:49 AM	533	31H	n
Promenade	16-Jun-09	8:50 AM	505	11	n
Promenade	16-Jun-09	8:50 AM	508	27H	y
Promenade	16-Jun-09	8:51 AM	419	14	n
Promenade	16-Jun-09	8:54 AM	235	12	n
Promenade	16-Jun-09	8:54 AM	414	26L	n
Promenade	16-Jun-09	8:59 AM	302	13	y
Park Station	16-Jun-09	11:02 AM	416	30	n
Park Station	16-Jun-09	11:03 AM	516	12	n
Park Station	16-Jun-09	11:04 AM	403	2M	n
Park Station	16-Jun-09	11:06 AM	510	24T	n
Park Station	16-Jun-09	11:08 AM	408	17E	n
Park Station	16-Jun-09	11:10 AM	520	22M	n
Park Station	16-Jun-09	11:10 AM	706	19T	n
Park Station	16-Jun-09	11:11 AM	413	31G	n
Park Station	16-Jun-09	11:13 AM	511	5R	n
Park Station	16-Jun-09	11:13 AM	501	32H	y
Park Station	16-Jun-09	11:14 AM	532	14E	y
Park Station	16-Jun-09	11:17 AM	411	15E	n
Park Station	16-Jun-09	11:18 AM	906	34H	n
Park Station	16-Jun-09	11:20 AM	310	26D	n
Seagate Station	16-Jun-09	1:22 PM	312	5R	y
Seagate Station	16-Jun-09	1:23 PM	532	14	y
Seagate Station	16-Jun-09	1:25 PM	414	26D	n
Seagate Station	16-Jun-09	1:28 PM	504	16K	y
Seagate Station	16-Jun-09	1:34 PM	408	17B	n
Seagate Station	16-Jun-09	1:35 PM	314	28	n
Seagate Station	16-Jun-09	1:35 PM	515	30	y
Seagate Station	16-Jun-09	1:39 PM	309	27N	y
Seagate Station	16-Jun-09	1:40 PM	713	15A	n
Seagate Station	16-Jun-09	1:40 PM	303	34	n
Seagate Station	16-Jun-09	1:40 PM	403	2M	n
Westfield Franklin Park	16-Jun-09	10:02 AM	706	19S	n
Westfield Franklin Park	16-Jun-09	10:25 AM	408	2M	n
Westfield Franklin Park	16-Jun-09	3:31 PM	507	2C	n
Westfield Franklin Park	16-Jun-09	3:39 PM	534	22F	n
Westfield Franklin Park	16-Jun-09	3:45 PM	514	3 south	n
Westfield Franklin Park	16-Jun-09	4:00 PM	600	2M	n
	Observations	Announced	%	Not Announced	
Total observations	159	39	24.5%	120	