

September 6, 2022

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket No. FTA-2022-0018; National Transit Database Reporting Changes and Clarifications

Dear Secretary Buttigieg,

As the nation's leading advocate for the technological modernization of our transportation system by focusing on advancing research and deployment of intelligent transportation technology, the Intelligent Transportation Society of America (ITS America) is grateful for the opportunity to comment on the U.S. Department of Transportation's (USDOT) proposed National Transit Database (NTD) reporting changes.

ITS America was founded in 1991 as an advisory council to USDOT on technology innovation and emerging transportation technologies. It is the only organization in the country that represents all sectors – public, private, academic, and nonprofit – to advance transportation technology. Our membership includes state and city departments of transportation, transit agencies, metropolitan planning organizations, automotive manufacturers, technology companies, engineering firms, automotive suppliers, insurance companies, and research and academic universities. Our vision is a better future transformed by intelligent mobility: one that is safer, greener, and smarter. We work toward a world in which we achieve the nation's Vision Zero goals to eliminate fatalities and serious injuries on our roadways; a world that is more sustainable, resilient, and adaptable to climate change; and a world in which communities have equitable and affordable access to transportation and critical services. Our vision aligns directly with USDOT's goals to advance safety, climate, and equity.

ITS America is especially supportive of two proposed changes: 1) requiring annual submissions of static General Transit Feed Specification (GTFS) data to the NTD; and 2) requiring certain demand response modes to report geospatial data to the NTD.

ITS America supports increased digital infrastructure investments writ large, including broadband, 5G, intelligent transportation systems, and of course, open-sourced, digital infrastructure software and data standards. We see data standards as an important component of digital infrastructure to address issues of connectivity and comprehensive transportation planning and demand management. We support the development of open data standards like GTFS, including the California Integrated Travel Project (Cal-ITP) proposed extensions, and other data formats related to transit.

Our transit sector members have frequently expressed their need to optimally leverage data to better see and understand their riders' needs along with the full breadth of their systems. Transit agencies frequently deal with private sector mobility companies that limit their access to trip data. For instance, in working with microtransit providers, agencies want to know vehicle locations, but private sector

providers won't share that data outside of the vendor's platform. This keeps transit agencies from seeing and understanding what the entire system looks like.

Vendors often are not using modern technology standards for sharing data. Some systems are closed and outdated, making them hard to access. Public transit agencies need unfettered access to all trip data in their service areas. ITS America appreciates USDOT's support, which encourages the type of access needed to achieve widely held transit industry goals.

Finally, as we start thinking about innovative modes, how we count trips and boardings is critically important. There is serious value in thinking about what it means to count and fund different types of rides and connections, and the addition of both GTFS data and geospatial data allows for a clearer and more robust picture. We fully support the NTD including all these data points.

ITS America looks forward to working with the Federal Transit Administration on these issues as they continue to develop.

Sincerely,



Laura Chace
President and CEO