

The Washington State Agency Council on Coordinated Transportation (ACCT) finds the proposed *Policy Statement on FTA School Bus Operations Regulations*, (FTA-2008-0015) could be interpreted to be overly restrictive and counter to FTA's stated goal of supporting coordinated transportation. The Council requests that FTA retain the historic school operations policy and provide additional clarification to assure transit operators and school district administrators that current practice is allowable under the revised policy framework.

ACCT is a Washington State partnership of the Department of Transportation, Department of Social and Health Services, Office of Superintendent of Public Instruction, Community Transportation Association of the Northwest, Washington State Transit Association, Washington Association for Pupil Transportation, Office of the Governor, Developmental Disabilities Council, Governor's Committee on Disability Issues and Employment, consumers at-large, and state legislators. The Council's vision is to remove transportation as a barrier to full participation in the community.

Washington State has several areas where the proposed policy change would seem to result in a significant change in rules and possibly result in adverse affects on coordinated transportation. We have a long history of transit agencies collaborating with school districts in order to provide a high level of service at a low cost to the taxpayer.

In Mason County, Washington, Mason Transit has worked with the school districts on coordinated transportation for many years. In this example of good government, the school district pays no money for the service and receives a fee for use of their school buses. Mason Transit uses district owned school buses and operates a flex-routed schedule that leaves from an area adjacent to the school property and is open to the general public. This service does not compete with regular school bus transportation. This service provides transportation for after school activities, when no school bus transportation would otherwise be provided, and no other transit vehicles are available.

This award-winning coordinated transportation service is a national model often pointed to by the Community Transportation Association of America, FTA, United We Ride, and others. However, it is not clear that this model would be permissible under the proposed policy change. The new policy states that only *de minimus* route changes would be allowed. While open to the general public, students are the primary beneficiary of the Mason Transit service. This service is beneficial to a community and not taking business away from private industry (there are no school bus contractors operating in the area). Yet the proposed policy would stop this well regarded service from operating.

ACCT believes that this proposed policy could result in undue hardship on public school populations, public school districts and transit agencies. Presently,

funding resources for public school districts are under severe constraint, and in many instances student transportation services are being reduced, if not eliminated. Because of these budgetary constraints, it would be improbable that public school districts would be able to contract these transportation services with private school bus providers.

While ACCT understands the concerns of FTA to provide protection for the private school transportation industry in competition with transit agencies, the policy statement as worded is ambiguous enough that local transit agencies may decide to cancel existing school service based on their interpretation of the intent of the proposed policy. Many school districts in Washington State have used transit systems to meet part of the student transportation need in their community. This provides transportation service at low cost and increases the student awareness of local transit systems. Hopefully, this results in long term increases in transit ridership. This use of transit vehicles has worked successfully in Washington State without complaint from school bus contractors for many years.

ACCT recommends that FTA clarify and provide assurance that the historic and current school transportation operations by Washington transit agencies are within the scope of the amended policy.