

## **NTD Asset Inventory Expansion Webinar Q&A Session - 12/16/15**

Question: If ULBs can be set by agencies but have to be approved by FTA how will that work when FTA is not receiving TAM plans?

Answer: We are asking you to report a useful life benchmark to the NTD. The benchmark will be entered with your NTD reporting and approved at that time.

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Question: Asset management NPRM issued in September requires annual assessments and reporting. This NPRM has a three year assessment schedule. Will this conflict be reconciled as part of the final rule?

Answer: That is a good question. Since it refers to the requirements in the rule making, I think we will have to defer to make sure that the rule making team sits down to address any confusion about what's required in terms of the asset inventory that goes in to the asset management plan versus what we are asking you to report to the NTD, which is separate from what you have in your plan. We need to make sure we iron out any inconsistencies.

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Question: Is useful life benchmark the same as FTA's definition of useful life in this NPRM?

Answer: The useful life benchmarks (reported to the NTD) would be based on what you would have in your transit asset management plan. So yes.

But the thing we want to continually emphasize is that the Useful Life Benchmark reported to the NTD is different from the useful life that is used for grant making purposes. Many people are familiar with FTA's grant rules which require a minimum useful life of 12 years for a bus. The ULB that is reported to the NTD is the point at which the asset will enter in to your state of good repair backlog. Not the minimum useful life you have to reach for grant making purposes.

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Question: What if the owner of the facility and the partial owner of the facility are both federal grantees. How are the costs and conditions to be allocated if this condition exists?

Answer: You would both report the facility. If you are both responsible for funding a part of that capital replacement, both grantees would report it as a reportable facility and you would indicate if you are fully or partially responsible. If you only fund a part of the capital replacement, you would mark the percentage you are responsible for funding. If the owner is responsible for funding only a part of the replacement, they would also report it. And they would say they are partially responsible and what percentage they are responsible for replacing.

The NTD has to deal with this situation for many years. One agency would be designated as the primary.

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Question: How about a parking lot for employee parking?

Answer: I don't know that we have a final answer for this. I think this is one that we will have to defer and get back to you guys on. When we publish the final guidance we will publish a response to comments for anything we don't have an answer to right now.

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Question: I think this question refers to the first question that we had related to the ULBs. The person mentioned how will that work when we have to set goals within three months of the final rule? How will that work with FTA receiving TAM plans and how will that work when we have to set goals within three months of the final rule?

Answer: In terms of NTD reporting, you are only required to report the useful life benchmark when you are reporting to the NTD. So the NTD reporting requirement will not change. Annual reporting requirement will follow the regular reporting cycle. So we are not expecting that within three months of the final rule you have to report this information in to the NTD. If there will be required reporting of that information through the TAM program, the final rule will address how that will occur.

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Question: What is meant by ten year age buckets?

Answer: They are essentially referring to within a decade; so 1900 to 1910, 1910 to 1920, et cetera, et cetera. We are basically asking you to lump your assets by age into the decade in which it was either originally procured or had its last substantial rehabilitation.

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Question: For condition reporting on Facilities, is this an average condition rating of facilities and its components?

Answer: There will be more detailed guidance on how to conduct a facilities condition assessment and how to report it to the NTD forthcoming; but what we are suggesting is one condition rating per facility. For each facility you would report one condition assessment rating and for all of your reportable facilities the system would calculate an average.

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Question: How do you propose to allocate ATC cab signaling equipment which is used along the

right-of-way but does not have fixed location assets as in the wayside signal configuration?

Answer: We are not asking for cab signaling equipment as part of your guide way reporting. You will only be reporting your wayside signaling equipment; anything that is in a fixed location along your guide way.

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Question: We run a fixed route bus system. There is some local developer who is building an interior waiting area for transit riders. They will not manage or maintain. Does this have to be reported?

Answer: I would probably need a little bit more information to understand this question. This might be one if you want to e-mail me directly at the e-mail that I provided to get a little more information. If it is a waiting room within a company's building that they allow transit riders to use, I don't know if that would be reportable. But if it is being built as a passenger station it may be reportable. So again if you want to contact me at my e-mail we can discuss that one a little more specifically.

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Question: Are we required to report information regarding our subrecipient's vehicles?

Answer: There is some reporting required for any vehicle used in the provision of transportation service. For non-dedicated fleets we don't intend to change the reporting requirements. You would in the same way you report now: you provide information on a representative vehicle for a non-dedicated fleet. For 5310 and 5311 subrecipients, reporters would be required to report on all of their revenue vehicles.

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Question: Will authorities that have subrecipients be required to provide group TAMs? Who is responsible for the NTD reporting, group plan owner or subrecipient?

Answer: They would remain the same as they are now. If a state DOT is already doing all of NTD reporting for its subrecipient that would remain the same. The group TAM plan is really related to the performance metrics. A group TAM plan is where the group sponsor would be reporting the performance metrics for all of the people within that group TAM plan. So whoever is the sponsor of the group plan would be responsible for reporting the performance metrics to the NTD.

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Question: Do service vehicles only include street legal vehicles only besides steel wheeled?

Answer: I don't know that I have a specific answer for that yet. I may need to mark that one and do a little bit more research.

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Question: To tie in with the anticipated burden percentages discussed (6.5 percent increase annually), is it expected that the reporters' time preparing and entering this data would be reportable in the context of the applicable general expense object class and classes?

Answer: Yes. Any additional time that you spend on reporting or any additional administrative burden would be reportable on the financial forms as a general administration expense.

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Question: If an operator has historically reported an asset in NTD but has no capital responsibility for the asset, who should be responsible for reporting: the asset owner or operator?

Answer: Under the current proposal, administrative and maintenance facilities are only reportable by an operator if they have a capital responsibility for the replacement or rehabilitation of the facility. An operator must report all revenue vehicles, guideway and passenger facilities that are used in the provision of public transportation. The reporter must indicate their percentage of capital responsibility.

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Question: Is the Small Systems Waiver still at 30 vehicles?

Answer: Yes

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Question: What is the definition of an "asset"?

Answer: That definition of an asset will also be for specifically addressed in the transit asset rule. In general, an asset is anything you would buy with a capital expenditure as opposed to an operating expenditure. There is a rule of thumb in a lot of FTA guidance at least a \$5,000 in value.

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Question: Would bus signal priority systems be included in the signal definition?

Answer: We are still hashing out bus right-of-way and reporting for bus right-of-way . It will be addressed more specifically in guidance.

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Question: When will we know when the NPRM is finalized?

Answer: The final rule will be published in the Federal Register. If you are on the NTD or asset inventory mailing list, you will receive an announcement that it has been finalized by

publication in the Federal Register.

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Question: Are we only required to report on 5310 funded vehicle and administration maintenance facilities of our subrecipients?

Answer: For subrecipients that provide public transportation, you need to report all assets used in public transportation regardless of funding source.

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Question: If multiple transit operators serve as a single station should they all include that same station in their reports or should only one operator report on that station?

Answer: Everyone should include the station in their report. One agency would be designated as the primary owner of that station, or primary capital funding behind that station. Even if you do not own the station, if you use a passenger station in revenue service you must report that station and indicate whether or not you are responsible for any of the capital replacement cost.

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Question: Can you go back to the whole "divide into ten year segments" statement and can you explain that further? Thank you.

Answer: We are asking to you to divide the assets into ten year buckets. So, as I mentioned before, you would take the asset for track, for instance, and you would say I have a thousand feet of track, a hundred feet of it was built in 1950. That would be 100 feet reportable to 1950 to 1960. A hundred feet of it was built in 1965. That would be hundred feet reportable from 1960 to 1970 etc. So essentially what you are doing is cutting up that asset and assigning it to the decade in which it was originally built or received its last major rehab.

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Question: How do you account for assets that have undergone rehabilitation to extend their useful life? Will you put them a bucket that reflects their total age or one that reflects their age based on when they were rehabbed.

Answer: What you would do is put it in the 10 year bucket when it received its last major rehab.

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Question: What do you mean when you say it an agency's responsible for replacement with regards to an asset, for instance, most of our assets are funded with grants and we insure them. We replace them when we get additional funding but don't have the local resources to replace them.

Answer: If you are paying for an asset with grant money that is provided to your agency and

you write the check for that asset, you are responsible for that asset. You spend the money on it out of your capital budget. You are responsible for the capital replacement in the reporting requirements we have outlined here.

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Question: How can we determine the age of our inherited infrastructure and facilities?

Answer: This is tough one for historic systems. Essentially, it would be based on the best information that you have available. So if you have any original engineering documentation, if you have a news clip from when it first opened, you could use this to report on the age. We are basically asking for you to report based on the best records that you have available to determine the age of the infrastructure that you have.

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Question: Must a not-for-profit report to NTD?

Answer: Yes. Under this current proposal, if you receive 5310 grant funds used for public transportation then your vehicles would be reportable to the NTD in the revenue vehicle inventory.

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Question: This presentation keeps referring to useful life when FTA documents refer to a minimum useful life. Is there a difference?

Answer: Our grant making documentation refers to a minimum useful life that an asset must reach to be eligible for additional funding. The useful life benchmark we are talking about in this presentation would be based on your capital replacement cycle. The useful life is the point at which it tips from what you would consider a state of good repair within your operating environment: when you would replace or place that asset in your state of good repair backlog. So they are not quite the same thing.

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Question: Are there agencies that have already made some progress towards implementing these changes? Can we learn some lessons from them?

Answer: There are definitely agencies that have made good progress towards creating asset inventories. A couple of years ago, FTA funded a number of asset management pilot projects and you can see which agencies were involved with them and their final reports from implementing asset management on FTA's asset management/state of good repair website. You can also see the reports from those pilot projects. <http://www.fta.dot.gov/13248.html>

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Question: How many comments did you get on the proposed TAM rule and when do you expect

the final rule to be released?

Answer: We have received roughly 110 comments on the asset management rule. If you are interested in them they are all publicly available at [regulations.gov](http://www.regulations.gov) (<http://www.regulations.gov/#!documentDetail;D=FTA-2014-0020-0001>). We are currently targeting a release of a final rule sometime in the summer 2016.

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Question: Is an agency that has small system waiver report the same way as a large system?

Answer: No. Small system waiver reporters have a smaller set of data that they are required to report. You would report the smaller vehicle inventory form. If you are in the small system waiver program that means you don't have a rail system which means you will not be responsible for any guideway reporting discussed today. The number of changes to what you have to report is going to be a lot lower. You will have to report targets and any eligible facilities.

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Question: When a state is reporting for 5310 recipient are we to report on all revenue vehicles or only vehicles that are funded by the FTA?

Answer: If this is a 5310 subrecipient then you must report all assets used in public transportation regardless of funding source.

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Question: Will there be any specific changes to reporters who receive 5311 funds, and therefore already report their vehicles, but also receive 5310 funds? Will they simply report them the same or will 5310 be added as a funding source for different fleets?

Answer: Reporting requirements for vehicles will remain the same, but you will now report the benchmarks and will be required to report on any eligible facilities.

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Question: Will SGR performance targets need to be submitted to NTD three months after the TAM rule effective date or do we simply need to have them set within three months and submit them to NTD along with the subsequent fiscal years reporting?

Answer: Although you must set the targets within the three months, you will report them in conjunction with your NTD reporting cycle.

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Question: Where is the definition of useful life benchmark and how is it defined -- determined if it is different than the use of life standards listed in FTA's 5010?

Answer: The useful life benchmark is the age at which the asset would enter in to your state of good repair backlog or you would replace that asset. FTA will provide default useful life benchmarks in the reporting system. The useful life benchmark is different from the minimum useful life used for FTA's grant making purposes. This is a minimum amount of time that you must keep the asset in service before it is eligible for replacement with additional FTA funds.

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Question: In Los Angeles, LACMTA is the legal owner of ROW operated and maintained by Metrolink, a separate transit agency. Would FTA expect these assets to be reported by both agencies?

Answer: I would probably need a little more information from the reporters. If you want to e-mail me directly offline I will help you address this.

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Question: Once the new TAM is in place fully, will Fixed-Facility Analyses still be required for Title VI purposes, or will the data now being input into NTD supersede this requirement?

Answer: We are not planning any changes to title 6 as part of the TAM rule process.

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Question: How long will we have to comply?

Answer: The NTD reporting will become a requirement at the time that the TAM rule is finalized. So once the final TAM rule is published, the NTD reporting requirements will go in to effect. As I said, I anticipate that will mean optional reporting in FY16 and mandatory reporting in FY17.

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Question: One of the requirements was to record how many miles of track is tangent versus curved. Is that correct?

Answer: Yes. The current inventory does request miles of track in tangent or curve.

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Question: How much additional time will be given to states to complete the NTD requirements since the reporting requirements will be substantially increased within the addition of 5310 systems. Obviously this is not the same as the 6% addition to providers.

Answer: We would have to appreciate comments filed in response to this from state DOTs about how long they expect they would need to comply with these requirements. We would take those comments into consideration when deciding on a final timeline for implementation. In general, we are usually pretty flexible about granting waivers upon request in the first year.



Obviously this will be a little different because there is an intersection here with the compliance with the TAM rule. The TAM rule obviously doesn't get in to the reporting requirements. This would be a great opportunity for states to comment on what would be the appropriate length of time they would need to comply with reporting.

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Question: With regard to nonrevenue support and maintenance vehicles for rail modes, will specialized equipment be reportable i.e., wire trains, tie inserters, ballasting and tamping equipment, etc?

Answer: Yes. You would report any of your specialty rail equipment as a steel wheel service vehicle.

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Question: Has a specific definitions been established for each conditioning rating. For example, what does condition rating 1 mean?

Answer: We will be providing more guidance on how to collect and calculate each condition assessment rating at the time that the TAM rule is finalized.

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Question: For support vehicles, would that include equipment like vehicles also? For example, pickup trucks or forklifts?

Answer: Yes. Service vehicles would be the automobiles that are not used in revenue service. So cars that you use for supervisors or managers or drives or for automobiles that move work crews around. It would also include like tow trucks forklifts, tampers, work trains, et cetera.

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Question: How will 5310 vehicle information be reported if the recipient is not a state DOT and does not operate transit service?

Answer: Under the asset management rule, if you are a designated recipient for a large urbanized area, the proposed asset management rule makes you responsible for offering those 5310 subrecipients a group plan and then likewise you would be responsible for handling the NTD reporting for the subrecipients in your plan.

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Question: Each facility will get a condition rating. What components, for example roofs, HVAC etc will be included in the assessment? So is there a limit on the building components that are to be included as part of the condition rating report?

Answer: The short answer to that yes, there be a limit on the components that will be included

and that will come out in the additional guidance. That will be provided later.

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Question: What is a realistic timeline? Is it likely to be finalized for fiscal year 2017 reporting requirements?

Answer: That's what we anticipate at this time. What we propose in the notice is that reporting would be optional for the 2016 reporting year beginning in the fall and would kick in to effect for 2017 reporting which, of course, wouldn't begin until September of 2017.

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Question: We serve a city in a neighboring state. Would that state also require a report or is it only required in the primary state of operation?

Answer: We probably need a few more details for this. The rules work slightly different if you are a 5311 only subrecipient and depends if you are receiving funding from both states. This question does not provide all the details to fully answer. If general if you are a direct reporter to the NTD you report once and that's it.

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Question: 5310 grantees do not provide public transportation. Will they only have to report on the FTA funding vehicles?

Answer: The way it was worded the rule is only applicable to 5310 subrecipients that provide public transportation. For the purpose of the NTD reporting, we are implementing a reporting requirement for those 5310 recipients covered in the proposed rule. Assuming the requirements for a 5310 is in the final rule, then that applicability requirement will carry over in to the NTD reporting. But as it stands in the proposed rule it was just applicable to 5310 providers that provide public transportation.

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Question: Will rail road at grade crossings, right-of-ways and waysides be reportable?

Answer: Yes, they would be reportable as signal assets. They would be reportable through the guideway module. Grade crossings would be reportable as special guide way elements and then signal houses would get lumped in with your signal reporting and would be a percentage of the total cost of the asset in ten year buckets. You would look at your entire signal system and if 20% of it was built in 1950, then you report 20% in 1950 and if 25% was built in 1970 it gets reported in 1970. I hope that answers the question.

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Question: I don't see in the asset inventory module reporting manual where fixed asset equipment would be reported. I see categories such as "passenger & parking facilities," "service

vehicle inventory," "revenue vehicle inventory", "administrative & maintenance facility inventory." Would equipment assets fall into one of these categories?

Answer: I might need a little more detail, but I am assuming the commenter is asking about equipment like hoists or lifts that are within your garage. We are not asking for any of that information. We are not asking for specific reporting of lifts, hoists, HVAC equipment etc. You must only report the facility as a whole and a condition asset of that facility. Guidance on how you would specifically conduct that assessment is forthcoming.

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Question: Does this include reporting on park and ride lots?

Answer: Yes. That would be considered passenger parking.

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Question: When will an updated draft reporting manual and forms be available?

Answer: There is a draft of the reporting manual and reporting forms available on the NTD website now (<http://www.ntdprogram.gov/ntdprogram/assetInventory.htm>). We hope to build out the forms in the new NTD reporting system in the new year and have them available in the system in the fall of 2016 for optional reporting.

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Question: How will the NTD determine the parameters and standards for asset management data, especially during the first few years of data reporting? For example, in the current NTD fuel costs have been given a range of exceptional values and if a price falls outside of that range there is a trigger for explanation. But this is based on typical years of data and benchmarks.

Answer: We will not going to be able to do historic benchmarks for data that's brand new to the system but is there the ability to benchmark against comparable agencies and if you fall very far outside of the bounds of what peers are reporting your analysts may contact you. There will be some ability for analysts to do that just based on peer comparisons. But as you mentioned yes, there will be additional checks and benchmarking added to the system over time as the historic record grows.

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Question: For 5310 recipients: how will they need to report their inventories? So if you get a vehicle once every ten years how long will you have to report?

Answer: You will report that vehicle until it is retired and then will report the new vehicle when it enters service. The inventory is a rolling snapshot of where you are that year. You will report any active vehicle and then when you retire that vehicle you report it as retired and you report your new active vehicle.

The asset management rule applies to 5310 subrecipient as long as they remain part of the program. If you are planning to regularly replace that subrecipient's vehicles through the 5310 program then they are an active subrecipient and they are included. It is worth noting that if they are only changing their vehicle inventory every ten years the reporting burden is very minimal because the NTD system will carry over the inventory each year and you will only be reporting changes.

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Question: With regard to asset inventory reporting for a non-dedicated fleet, could you provide more information on the definition of a "representative vehicle"?

Answer: There is no change from current reporting requirements. If you are relying upon a non-dedicated fleet you are supposed to include in the asset inventory a 'representative vehicle' and indicate the number of vehicles you run in peak service.

If you need additional clarity on the definitions, please consult the policy manual on the website. <http://www.ntdprogram.gov/ntdprogram/2014Policy.htm>

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Questions: When is this expected to be implemented?

Answer: We anticipate optional reporting in the fall of 2016 and mandatory in the fall of 2017. And that is all assuming that the transit asset management rule is finalized within that time period. If it is not finalized before fall of 2017 or within a reasonable time period before fall of 2017 the implementation would be concurrent with the final TAM rule.

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Question: Are rehabs required to maintain assets to the end of their useful life? Transit providers do not extend the asset use of life when rehabs take place. Only life extension overhauls will extend useful life of asset. Is that FTA's assumption and if so why would the assets be included in a different bucket once a rehab occurs?

Answer: This is mixing two buckets: the useful life benchmark is reporting for a service vehicle fleet in which case we are not asking you to report based on when you had a last overhaul or rehab. It is for track or guideway elements that you may report based on your last major rehabilitation. Please comment on the Federal Register notice if you have additional concerns.

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Question: If a 5310 subrecipient public transit provider has multiple assets that they own, how will we report replacement costs if we don't have detailed data on the assets?

Answer: We removed any requirement for the replacement cost information from the asset inventory. It was one of the major changes.

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Question: Expands on the previous one: are 5310 public transit providers required to report benchmark and replacement costs?

Answer: They are required to report a useful life benchmark for their revenue vehicles. At this point, a 5310 reporter that's only reporting vehicles would report a vehicle inventory and a useful life benchmark for that vehicle inventory.

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Question: If an agency receives 5310 funding, does it have to become a reporter on its own or through the designated recipient of funding? How does the 5310 reporter have to report to the NTD?

Answer: Under the rule urbanized area designated recipients are required to offer a group TAM plan to the 5310 subrecipients, which would mean they would have to report on behalf of those subrecipients. The 5310 subrecipient could also report directly to the NTD if they opted out of the group TAM plan.

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Question: Is all the inventory information we have already reported to NTD going to be loaded in to the new system or do we have to start in scratch?

Answer: What you currently report, which is basically the vehicle revenue inventory, will remain in the system and it will all be populated. I don't know that any of the track information that's currently reported will translate well to the new module but I will look in to that further.

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Question: When you say optional reporting will begin in 2016, does that mean reporting 2016 numbers in 2017 or reporting 2015 numbers in the year 2016?

Answer: It means fiscal year 2016 reporting. So you would report information for fiscal year 2016 the same criteria that you are using for 2016 reporting now for the NTD.

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Question: If the state passes through 5311 monies to a tribe to buy a vehicle who is responsible for NTD reporting for that vehicle?

Answer: The reporting remains the same as the current reporting structure. If the state currently reports for the subrecipient, the state would continue to report that for the subrecipient.

If the tribe is a direct recipient of tribal transit funds and reports directly to FTA then they

would continue to report directly.

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Question: Will we get a template of future NTD report that states all the data we will need?

Answer: Yes. In fact, that template exists right now on website.

<http://www.ntdprogram.gov/ntdprogram/assetInventory.htm>

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Question: What is your definition of a transit provider? We have 5310 subrecipients. Are they considered transit providers in the FTA?

Answer: That's a question we received in the asset management rule and we will be working out a specific response to that question as part of the response to comments in the rule. So that will refer to both the applicability of the asset management requirements in the TAM rule and by extension the NTD reporting requirements are just an extension of applicability of the TAM rule. Stay tuned as part of the release of the final TAM rule.

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Question: When the asset inventory expansion model is implemented, is it planned to include a bulk upload feature for accommodate upload of lengthy or detailed asset inventory listings?

Answer: We do not yet have a bulk upload feature built in to the NTD but that is something we are working on scoping out for this new system. So stay tuned. Not yet but I hope I hope to have it in time for the asset inventory.

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Question: Will there be an electronic data feed/API for the TAM reporting requirements?

Answer: So this is a similar question. I hope to have this functionality soon. Stay tune.

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Question: How does TERM come in to play with regards to condition rating?

Answer: It is the sample scale we will be using. So the condition assessment rule will generally follow the one to five TERM rating. The additional guidance on how to conduct and report a condition assessment will follow the publication of a final rule.

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Question: The single largest FTA-funded asset is a 3-block pedestrian mall, funded with w SGR grant. The mall is served by 3 bus stops. Do we report the pedestrian mall as a pedestrian facility or as something else?

Answer: If we are really agency specific questions like that we have a direct communication to make sure we have all the details that would be necessary to answer that question. But in general in it is FTA funded asset and it is part of the public transportation system, we expect it to be reported.

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Question: If we are the designated 5310 recipient with subs that receive vehicles for public transit but the vehicle remains titled to the designated recipient, will that affect whether it's reported as a subs vehicle versus designated agency's vehicle?

Answer: In general we try to avoid the issue of who is titled to a particular asset. We know from experience that there are all sorts of relationships regarding the titling and leasing of assets for reason or another. What we really look at is who was the operator of public transportation service. Is that operator or subrecipient funded by FTA? If so, they must report all the assets that are needed for the public transportation service.

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Question: Could you provide further clarification on implementation. I hear the fall of 2016 voluntary and fall of 2017 mandatory. In the fall of 2016 we will be reporting FY 16 data. So the fall of 2017 mandatory reporting will we actually submitted with the fiscal year's 2017 data or since the fall of 2017 is part of the fiscal year '18 then it is the fiscal year 2018?

Answer: In the fall of 2016 you will begin reporting data for your fiscal year 2016. So in the fall of 2017 you will begin reporting data for your fiscal year 2017. This is the same way that you have been reporting to NTD now. You will continue to report on the same timeline as you currently report. So if you have a fiscal year ending in the summer of 2016, you will begin reporting that data in fall of 2016. Fiscal year report ending at the end of 2016 will begin reporting that data in the spring of 2017. So you will be reporting on the same cycle that you report on now. Fiscal year 2017 mandatory reporting would be reporting in the fall of 2017 for fiscal year 2017 data.

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Question: How would assets of the regional Complementary ADA Paratransit provider be the responsibility of the fixed route transit agency?

Answer: What we look at is who is the operator of the public transportation services and is that operator funded by FTA, yes or no. If yes, then the TAM plan requirements apply to it and typically the NTD reporting requirements apply to it as well. An operator reports all of their assets necessary for providing service.

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Question: If a maintenance facility is not FTA funded does it still need to be reported in the NTD?

Answer: If you are responsible for the capital replacement and use the facility for the provision of public transportation services then it is reportable.

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Question: I run a purchase transportation service. Four of the 22 buses were purchased with FTA funds. Do I report on just the four buses or all buses?

Answer: You would report on all buses used in public transportation service regardless of funding source. If this is a purchased transportation provider, purchased transportation is normally reported by the purchaser of the service. The purchaser would be reporting all 22 buses that are used in the purchased service regardless of the funding source.

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Question: How does an agency account for non-owned assets used in the provision of transit services on a cost per hour basis such as taxi cab and/or Uber services used on a dynamic basis during peak loads?

Answer: This gets back to the previous question about non-dedicated fleets. The first thing to recognize here is that if the trip is being scheduled through your paratransit dispatch service on an overflow basis that makes it public transportation. If you are using dispatch for paratransit to provide overflow trips through another operator such as taxi operator or Uber that is using a non-dedicated fleet, you would report a representative vehicle to the inventory based on typical service.