



DATE May, 2010

SUBJECT: **APTA'S POSITION ON MODIFYING FTA'S RANSIT BUS SPARE RATIO RULE (THE "20% RULE")**

After careful consideration, review, and data compilation of the 40-year- old Spare Ratio rule the American Public Transportation Association (APTA) provides the following recommendations designed to accommodate the multitude of operating conditions facing modern, multi-modal, multi-faceted transportation operations working with advanced technologies, and high customer service demands while meeting the ultimate goal of providing quality public transportation services.

In response to the Transit Cooperative Research Program's (TCRP) report, bus fleet management in an Era of Increasing Technical Complexity: Analysis of Bus Fleet Spare Ratios, the following represents a summary of the recommendations from APTA's bus and paratransit CEO's for metrics to be used when calculating the spare ratio rule:

1. Fewer Than 50 Buses

- Determined by the transit agency based on local conditions

2. 50 To 250 Buses

- Annual Spare Bus Declaration Report
- No report required if the spare ratio is less than 25 percent

3. More Than 250 Buses

- 25 percent spare ratio for transit vehicles 35-feet in length and longer
- If spares exceed 25 percent, operations will need to submit a Bus Fleet Management Plan
- Small bus and non-diesel powered vehicles will be exempt from a spare ratio

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2

Spare ratio calculation includes the number of buses in a fleet, other exemptions, and recommendations include:

- Nine-month period for old/new transition review.
- Clarification of policy exemption for demand-response vehicles and trolley buses
- Exclude the following fleet vehicles under specific conditions when calculating the spare ratio:
 - buses being replaced by newly-procured buses (to be excluded for a defined period of time)
 - seasonal fleets
 - specific fixed-route sub-fleets would be excluded when calculating the fleet-wide spare ratio, such as experimental vehicles being tested in revenue service
 - exclude fleets designated as having manufacturer fleet defects when calculating the spare ratio
- For all others, calculate individual spare ratios by sub-fleet
- Exclude buses not used as a result of service cuts (for financial reasons) when calculating the spare ratio, if those vehicles are necessary to restore service when financial conditions improve
 - contingency fleet plan must be developed to report status of parked fleet and maintenance plan

Documents developed to support the updated spare ratio rule include:

- The *Annual Spare Bus Declaration Report* consists of a current and projected inventory of buses in the agency fleet, by sub-fleet, and a high-level description of the service and maintenance demands of each fleet/sub-fleet.
- The *Bus Fleet Management Plan* is an extensive report designed to document and justify the fleet's peak and spare vehicle levels, and will be evaluated by the FTA for compliance, reasonableness of application, and operational efficiencies. The 25 percent spare ratio change is a reasonable level to recommend with potential flexibility beyond this percentage as evaluated. The service profiles and interchangeability considerations will be important elements to include in the annual report by documenting the spare ratio requirements with basis. More flexibility in spare ratios to meet unique operational needs and local conditions may be needed.