



June 5, 2020

The Honorable Chairman DeFazio  
Chair  
Committee on Transportation and Infrastructure  
United States House of Representatives  
Washington, D.C. 20515

Dear Chairman DeFazio:

On behalf of the Community Transportation Association of America's nearly 1,300 members, comprised of rural, small-urban, non-emergency medical and specialized transportation providers, we are writing to thank you and your staff for your leadership in drafting legislation that speaks to many of the priorities that have been raised by CTAA and our partners in public transportation.

As Congress begins to debate the next surface transportation reauthorization bill, we wanted to voice our support for the following portions of the bill:

- The increased funding proposed under FTA's formula grants for urban, rural, tribal and specialized transit. In FY 2020, spending from the Highway Trust Fund's Mass Transit Account is \$10.2 billion, with a healthy "plus-up" in general revenues that further boosted formula grants. The INVEST in America Act would maintain these levels in FY 2021, then bump up trust fund spending to \$16.2 billion in FY 2022, with incremental increases to \$17.0 billion in FY 2025. CTAA strongly supports increasing FTA's formula grant programs. These tried-and-true formulas ensure that transit systems, no matter the size, receive an equitable share of transit funding. Additionally, the use of formulas allow systems to properly budget and prepare for the coming years.
- The INVEST in America Act would add a provision, applicable to Section 5307, 5310 and 5311 recipients, under which capital assets that have reached the end of their useful life, but are still worth more than \$5,000, can be sold off at their current market value, with the transit agency and FTA sharing the proceeds of that sale. This is better for transit agencies, as the current federal regulations' require that 100 percent of all such sale proceeds must go to the US Treasury, even if there's no remaining federal financial interest in the asset.

- Increasing the set aside in Section 5307 for the Small Transit Intensive Communities (STIC) program to 3 percent. Many of CTAA’s small-urban transit system members rely on STIC to fully serve their communities.
- The increased funding for bus and bus facilities under Section 5339. In FY 2020, the Section 5339 authorization is \$808.7 million, to which Congress has added supplemental appropriations from general revenues. The INVEST in America Act boosts Section 5339 funding to \$2.1 billion in FY 2022, which would increase steadily to \$2.2 billion in FY 2025.
- The INVEST in America Act would make some initial modifications to FTA’s Buy America and Pre-Award/Post-Delivery Audit requirements, and would call for bus procurements to be conducted using open-market, performance-based specifications, around which there’d be a negotiated rulemaking aimed at establishing a list of specific components deemed eligible for inclusion in bus procurements.

We also appreciate the following COVID-19 provisions included in the *INVEST in America Act*:

- Formula funding determinations in FY 2022 would be based on transit data for the 2019 reporting year, thus avoiding impacts from many transit systems’ dramatically reduced operations during the pandemic.
- The proposed supplemental authorization for FY 2021, modeled after the CARES Act, in which \$5.8 billion would be distributed on a formula basis to recipients of Section 5307, 5310 and 5311 funding. Inclusion of Section 5310 is something we did not see with the CARES Act. Unlike the CARES Act, these particular funds would carry the same time limits as “regular” apportionments of Section 5307, 5310 and 5311 funding. There also would be a \$958 million supplemental appropriation to Section 5309. All these funds could be used to cover 100 percent of eligible costs
- ALL formula grants under Sections 5307, 5310, 5311, 5337 and 5340 in FY 2021 would carry a 100 percent federal share.

The record level of investment proposed in this bill would not only allow our rural, tribal, specialized and small-urban transit providers to continue meeting demand, but explore new and innovative ways to better serve their communities. We applaud this bill's important emphasis on improved bus operations and capital investment, the incorporation of meaningful improvements to procurement and vehicle disposition, and the focus on transit services for low-income and persistent poverty communities.

We were honored to work with you and your staff on this legislation and we thank you for the opportunity to present challenges and ideas faced by our members. We look forward to continuing this relationship as we approach the upcoming FAST Act deadline.

If you have any questions, please don't hesitate to reach out to me at [bogren@ctaa.org](mailto:bogren@ctaa.org) or 202.247.1921.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Bogren", with a long horizontal flourish extending to the right.

Scott Bogren  
Executive Director