

RESOLUTION NO. 1990-207

**A RESOLUTION ADOPTING A LOCAL POLICY FOR THE  
COMPETITIVE CONTRACTING OF TRANSPORTATION SERVICES  
IN NORTHEAST OHIO BY THE GREATER CLEVELAND REGIONAL  
TRANSIT AUTHORITY.**

WHEREAS, the Greater Cleveland Regional Transit Authority is to establish a locally developed policy and process for encouraging private sector participation in the planning and operating of public transportation services, as required by Urban Mass Transportation Administration Circular 7005.1, issued on December 1986; and

WHEREAS, the Northeast Ohio Areawide Coordinating Agency, which must certify compliance with such a locally developed policy and process, has produced a Local Policy For The Competitive Contracting of Transportation Services in Northeast Ohio; and

WHEREAS, the Greater Cleveland Regional Transit Authority would be in compliance with UMTA C 7005.1 by its adoption of said Policy;


NOW THEREFORE, BE IT RESOLVED, by the Board of Trustees of the Greater Cleveland Regional Transit Authority:

SECTION 1. That the Authority hereby adopts the Local Policy For The Competitive Contracting of Transportation Services in Northeast Ohio so as to be in compliance with UMTA C 7005.1.

SECTION 2. That this resolution take effect immediately upon its adoption by the Board of Trustees.

Adopted: November 27, 1990

  
President

Attested:   
General Manager  
Secretary-Treasurer

Greater Cleveland

# Regional Transit Authority

## Inter-Office Correspondence

To: Earl J. Martin  
President, Board of Trustees

Date: November 20, 1990

From: Ronald J. Tober, General Manager  
Secretary-Treasurer

Subject: Policy for Privatization/  
Competitive Contracting of  
Transportation Services

On December 5, 1986, the Urban Mass Transportation Administration (UMTA) issued a Circular (UMTA C.7005.1) establishing procedural guidance for public transit operators in implementing locally developed processes for private sector participation in the provision of transit services. This Circular was pursuant to UMTA's private enterprise participation policy, published in the October 22, 1984 edition of the Federal Register (49 CFR 4310). This policy was designed to encourage involvement by private transportation providers in the planning and provision of public transit services.

The local process is submitted to UMTA for its concurrence. When accepted, the Metropolitan Planning Organization (MPO) certifies the local process is being used through monitoring conformance with it by public transit operators.

In the Greater Cleveland area, the Northeast Ohio Areawide Coordinating Agency (NOACA) is the MPO. RTA, LAKETRAN, and Lorain County Transit are the local public operators subject to the UMTA Circular. Representatives of each of these entities have worked together to develop a local policy which takes a regional approach to creating a process for private sector participation. The document created thus provides for private sector involvement in the planning process; establishes criteria for evaluating services for possible competitive tender; provides for periodic examination of services; outlines a dispute resolution process. This was previously presented to the Board's Operations Committee for review.

In previous conversation regarding the policy with the Board Operations Committee, some questions were raised about the criteria established for determining a services' candidacy for competitive tender. These criteria are to be locally established. For Northeast Ohio's public transit operators, a varying threshold approach is used. It is designed to prevent highly expensive and administratively inefficient packaging of services for competitive tender. It recognizes that for a large system, such as RTA, the preparing of every minor service change for bid would be costly and time consuming. The varying thresholds thus allow competitive tender of truly significantly restructured services.

Some examples of applying the threshold approach to RTA service changes are as follows:

- o #45 West 65th-Ridge
  - Original weekday service operated peak hours only, 6:20 a.m. - 9:48 a.m. and 3:10 p.m. - 6:28 p.m. with a 70-minute frequency of service. Service was improved by adding trips throughout the day and evening, 6:20 a.m. - 11:08 p.m., and increasing frequency of service to 40 minutes.

The route went from one bus operating 7 service hours daily to two buses each operating 16 hours daily. This is a greater than 100% increase in service hours, the threshold for service that was operating in the 60-89 minute range. This would thus be a significant restructuring of service.

o #71 Ford-Holland

- Original service operated weekdays 5:39 a.m. - 6:54 p.m. with a 30-minute frequency of service using one bus. The route was extended, the service span was expanded slightly and the frequency of service remained comparable. However, a second bus was added and thus service hours increased by 100%. The threshold for routes with 30-44 minute frequencies is 50%. This would also constitute a significant service restructuring.

o #98 Brookpark Road

- This service originally operated during peak hours only on weekdays, 6:11 a.m. - 9:56 a.m. and 2:54 p.m. - 6:37 p.m., with an 80-minute frequency of service, using one bus. The improved service operates throughout the day, 6:11 a.m. - 9:39 a.m., with a 30-minute frequency of service along an extended route using two buses. This is a greater than 100% improvement in service, the threshold for service with a 60-89 minute frequency. It too is a significant restructuring.

All three of the above mentioned routes involved route extensions, increased service frequencies and expanded service spans. Most RTA service improvements do not exceed the thresholds, however. Three examples from the upcoming December service changes best demonstrate this:

o #4 Payne-Wade Park

- The route is being extended to Garrett Square at Lakeview and Superior. The existing weekday service operates 5:12 a.m. - 1:01 a.m., a 20-hour span. Existing frequency of service varies from 30 to 60 minutes depending on the time of day. The span will remain the same and frequency of service will be 20 to 40 minutes. Because service hours will be increased within the percentage thresholds established for each frequency of service range, the service would not be considered significantly restructured.

o #38 Payne-Hough

- Frequencies of service will be comparable to the 45-minute base and 22-minute peak frequencies currently in place span of service will remain basically the same, 5:30 a.m. - 11:30 p.m. The route will be extended from the V.A. Hospital to the East 118th Street Loop. Service hours will be slightly increased overall, but still fall well within the established thresholds.

Earl J. Martin  
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- o #36 Eddy Road
  - Span of service (5:00 a.m. - 7:00 p.m.) and frequency of service (16-32 minute) will remain basically the same as the existing service is extended to Garrett Square. While a bus is added for part of the day, service hours will not increase by the 25%-50% range required to define it as significantly restructured.

The varying threshold approach allows RTA to continue to address service enhancements while only requiring consideration of significant improvements for privatization.

RJT:ryw

DRAFT

DEVELOPMENT  
OF A  
LOCAL POLICY  
FOR THE  
COMPETITIVE CONTRACTING  
OF  
TRANSPORTATION SERVICES  
IN  
NORTHEAST OHIO

NOVEMBER, 1990

NORTHEAST OHIO AREAWIDE COORDINATING AGENCY  
668 EUCLID AVENUE, FOURTH FLOOR  
CLEVELAND, OHIO 44114

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## PART I - INTRODUCTION TO COMPETITIVE CONTRACTING

### Competition - A National Overview

The use of private sector resources in service to the public sector has been gaining increased use and acceptance in recent years. Public and quasi-public jurisdictions and agencies have found it advantageous to involve private enterprise in the design, construction, ownership, financing and operation of public services and facilities for the following reasons:

- reduction of direct public expenses through private sector efficiencies in costs, time, productivity, and economies of scale;
- extension of public general obligation (tax) fund resources;
- limitation of public risk by sharing or shifting risks with private providers, or;
- maintenance of or increased service levels with no increase in taxes or user fees.

This "public/private partnership" puts the business talent and drive of private enterprise to work for the good of the general public. The central theme is to have the private sector provide goods, facilities, or services which have traditionally been provided by the public sector. Examples of competition include these public services commonly contracted out in the Northeast Ohio region:

- |                                      |                                      |
|--------------------------------------|--------------------------------------|
| - commercial solid waste collection  | - transit services:                  |
| - residential solid waste collection | RTA's C.R.T. and Flats flyer service |
| - street lighting                    | LCTB's fixed route operation         |
| - vehicle towing and storage         | LAKETRAN'S Commuter Service          |
| - ambulance service                  | BTA's fixed route operation          |

and, most recently, prison construction and operation.

## Competition in Transit Services

The Federal government's role in mass transit can be likened to a pendulum. Until the early 1970's there was little involvement with or subsidy to local operators. Then, due to a number of factors, private transit providers began going out of business. Transit dependent segments of the population--the poor and elderly--were faced with hardship. The Federal government, through the Urban Mass Transportation Administration (UMTA), stepped in to play an active role in transit for the benefit of its citizens. Government subsidies for the operating and capital expenditures of transit systems led to the creation of public transit authorities. These authorities purchased private transit providers and assembled areawide operations into coordinated public transit systems.

Public Transit Systems soon had to deal with the same problems the private sector had dealt with unsuccessfully--decline in ridership, increased labor and operating costs, deferred capital expenditures, and escalating maintenance costs. Thus, costs to the taxpayer increased annually while, in many cases, fewer people used the services. By the early-and mid-80's, public subsidies continued to grow at a rate which became difficult to sustain and more difficult to overlook. Therefore, new approaches to the transit industry had to be explored.

While the government viewed public transportation as a vital ingredient to the overall health and welfare of its citizens, it also recognized that costs were becoming burdensome. Therefore, UMTA devised and promoted the doctrine of increased private involvement in providing transit services.

Competition by private sector suppliers for providing goods and services to public and private transit operators is as important as providing basic transit service. Cost accounting and analysis practices have taken on new importance by providers to rationalize purchase of goods or services from private sector suppliers.



## PART II - PRIVATE SECTOR PARTICIPATION PROCESS

### Legal Framework for Competitive Private Participation

The Urban Mass Transit Administration (UMTA) published its private enterprise policy in the October 22, 1984, Federal Register (49 FR 4310) which stipulated that the private sector be assured of participation in the provision of goods and services for public transit.

This is to be done by the establishment of a local process that sets forth mechanisms for such participation. On December 5, 1986, UMTA released a Circular (UMTA C 7005.1) providing procedural guidance for establishing the local process. This Circular sets forth the following elements that must be included in the local process:

- Early notice and consultation with private providers of plans involving new or restructured service and periodic re-examination of existing service.
- Periodic examination, at least every three years, of each route to determine if it could be more efficiently operated by private enterprise.
- Description of how new or restructured services will be evaluated to determine if they could be more efficiently provided by the private sector through a competitive bidding process.
- The use of fully-allocated costs as a factor in the public/private decision.
- A dispute resolution process which affords all interested parties an opportunity to object to an initial decision.

This local process is to be submitted to UMTA where it will be reviewed for conformance with statutory requirements. When an accepted local process is in place, the MPO (NOACA, in this case) shall be responsible for certifying that each Annual Element of the Transportation Improvement Plan (TIP) submitted by recipients of UMTA funds fulfills these local process requirements. UMTA, however, may not:

- Condition a Section 9 grant on a specific level of private sector involvement;
- Establish quotas for private sector involvement; or
- Mandate the local decision regarding private sector involvement.

This process relies on the MPO to: 1) certify the use of the local process to guarantee private sector access, and 2) to document the results of the process. This places greater emphasis on the MPO as a monitor of policy conformance and provides UMTA the role as an appeal mechanism for the private sector.

#### Major Areas of Opportunity for Private Involvement

It is in the following three areas of service provision that current private sector efforts are concentrated:

- direct provision of transit services, where a private entity contracts competitively with a public operator to deliver a specific service. These can be route operation, maintenance, management, planning, or a whole range of consulting services such as engineering, accounting, billing and ordering;
- provision of new, start-up services that have not heretofore been provided. These "turn key" operations can include

specialized services such as elderly, handicapped, light-rail, or other elements provided to the public sector's needs and specifications;

- and the opportunity for the public sector to grant to the private sector certain concessions the government has that are worth money to the private sector. These concessions might include zoning for a building project, air rights development options, or other building variances in return for the developer providing a service, constructing a transit station, or the like. This area is the least explored of all the options.

Major opportunities for competitive contracting activities include purchase of vehicles, spaces, fuel and lube items, tools, maintenance items and other supplies, and specialized business services such as consulting planning and engineering, advertising and public relations, or temporary personnel. Competitively contracted service provides a measure by which to compare the performance of in-house service. Deciding on whether or not to privatize service is comparable to any other buying decision and should utilize the latest in cost analysis procedures and software.

#### NOACA "Forums"

Six special meetings of private providers were held by NOACA during the development of these competitive contracting policies. Called "Forums" to indicate a free exchange of information and ideas, each had a specific topic or focus. These Forums included:

Forum One -- March 17, 1989 -- Introduction to the Competitive Contracting process

Forum Two -- June 16, 1989 -- Entrepreneurism

Forum Three -- October 10, 1989 -- Competitive Contracting Workshop

Forum Four --- December 14, 1989 -- Labor Issues

Forum Five -- June 7, 1990 -- Draft Policy Statement

Forum Six --- September 11, 1990 -- Final Policy Statement

Goals for these interactive meetings included:

- o to get private transit providers involved in public transit because of their knowledge, skill, spirit, and productivity;
- o to establish effective communications between public and private transit providers;
- o to continue and enhance provision of transportation services to the community, particularly the transit-dependent;
- o to inventory all public and private transit suppliers of services and materials;
- o to create an organization of private transit providers and establish a regular meeting schedule;
- o to develop a methodology for the writing of technical proposals (RFP's) and a consistent process of analysis and evaluation of responses;
- o to provide education on contract preparation, Federal and State legal requirements for the contracting process, and 13c labor provision guidelines;

- o to develop parameters for measuring service and financial performance (productivity) during a contract;
- o to provide education in management and public relations techniques.

A mailing list for Forum participants was developed through a combination of existing NOACA lists, ODOT's Public Transportation Division, the Ohio School and Transit Association, responses to public meeting advertising, and word-of-mouth.

#### Development of a Local Policy

On April 22, 1986, NOACA provided approximately sixty private transit providers and those public operators in the five-county area with copies of its draft Interim Policies and Procedures concerning Private Sector/Competitive Participation in Mass Transportation Programs within Northeast Ohio. These transit providers were invited to submit their comments to NOACA on the interim policies and procedures. The Lorain County Transit Board, the City of Maple Heights Transit System, the City of North Olmsted Municipal Bus Line, the Greater Cleveland Regional Transit Authority, LAKETRAN and Greyhound Bus Lines provided feedback. The Ohio Department of Transportation has also supplied NOACA with its input.

The local policy (Part III of this report) was developed as a result of the cooperative effort of the above listed organizations.

#### Policy Issues

For purposes of these policies and procedures, where providers eligible to bid on supplying transit service are mentioned, the publicly-owned, including municipal transit systems, are encompassed, as are private

sector transit carriers. This change was made because the Urban Mass Transportation Administration has moved toward promoting the broader issue of competition for providing services versus exclusive privatization of transit operations, and these publicly-owned systems should be accorded the same rights and assurances as private operators.

The competitive contracting policy that UMTA has promulgated, which implements those sections of the UMT Act pertaining to private enterprise participation, is intended to encourage and promote increased private sector opportunities in the provision of mass transportation services within a more competitive environment. The improved, more efficiently provided, and/or lower cost operation of transit services is the goal of this policy.

It should be noted that the policy which is contained in Part III of this report is not concerned with procurement issues, as these are subject to other UMTA and State regulations and laws. That is, the competitive tender of all projects offered to private providers/operators will be governed by federal and state procurement rules, contained in UMTA Circular C4220.1A, and Section 306 of the Ohio Revised Code, respectively. Such issues as procurement (including the form and structure of the tender, and contractual terms and conditions), maintenance, management/marketing issues, plus issues arising from an existing contract between the complainant and the transit authority must be resolved under these rules and regulations. The private enterprise participation policy addresses concerns relative to public operators meeting UMTA-mandated procedures in planning and operation issues.

The UMTA policies regarding private sector participation raise various local issues related to the manner in which:

1. The private sector will be provided with the opportunity to participate in the transportation planning process.
2. The private sector will be provided with the opportunity to bid on new or restructured transit services.

3. The private sector will be provided with the opportunity to bid on existing transit services.
4. The private sector will be provided with the opportunity to jointly develop capital investment projects with public agencies.
5. Proposals or bids by the private sector will be fully and fairly evaluated (i.e., development of criteria and cost methodology).
6. Disputes on provider issues are to be resolved within a predictable process (i.e., the development of a local mechanism for the resolution of complaints).

Each of these issues is discussed herein with a recommended local private sector/competitive participation policy to be adopted by NOACA in complying with UMTA's policy directives.

PART III: THE LOCALLY DEVELOPED PRIVATE ENTERPRISE  
PARTICIPATION POLICY FOR THE NOACA REGION

Section I: Private Sector Participation in the Planning Process

To accomplish the objective of maximum feasible private sector participation in the MPO planning process, particularly in development of the TIP/Annual Element, NOACA hereby establishes a process whereby transit providers are given an opportunity to participate and have their views considered.

- A. An inventory identifying all transit providers in the area has been prepared and will be updated to remain current with active providers.
- B. Reasonable notices (45 days minimum) will be provided to providers regarding proposed transportation plans and programs in order that they are made aware of opportunities for providers and can present their views.
- C. If a provider expresses a willingness to supply services being proposed, the requirements of the service involved should be specifically defined by an RFP or an IFB. The terms of equipment needs, time of service, hours of service, special service provision, etc., are made available to the provider so that it is given the opportunity to submit its response to the RFP or IFB.
- D. Cost comparisons should be a factor in evaluating service proposals of the providers versus public operators.

The existing and proposed operating costs of the public operators to provide the proposed services should be defined. All the fully allocated costs should be counted.



Any operating subsidies, capital grants and the use of public facilities should be reflected. Individual cost elements including overhead, labor, and maintenance should be identified.

The proposed price of the private provider to supply the needed services should be defined as required by the RFP or IFB. It should be noted that lack of availability of desired equipment by the private operator should not be considered in comparing service proposals as appropriate equipment may be leased from the public agencies to the provider, if the specified type of equipment is in the public transit agency's possession.

If equipment is not made available by the private operator, the private operator must insure that the specified type of equipment will be available by the planned start date.

- E. The steps undertaken by public transit agencies to involve providers in the planning process should be documented, including the evaluation of private operator service proposals, and presented to the NOACA Policy Board for consideration before endorsement of the Annual Element of the Transportation Improvement Program.

## Section II: Bidding on New or Restructured Transit Services

Federal regulations require that a list of all new or restructured services and operations to be implemented as a result of projects included in the Transportation Improvement Program be provided to UMTA either prior to, or concurrent with, the TIP approval process. This list is to include a description of how new or restructured transit services have been (or will be) developed consistent with UMTA's competitive provider policy.

The first step is identification of new or restructured service. The January 24, 1986 Federal Register includes in its definition "any new route(s), significant increase in service on an existing route, and a change in the type or mode of service provided on a specific, regularly scheduled route." The transit operators through the TIP process, are asked to identify these services. At present, they are also asked to provide their criteria in determining what constitutes a significant change. These are reviewed by NOACA.

A variable threshold will be used to evaluate opportunities for competitive tender of restructured services. The threshold varies as follows:

<u>Frequency of Existing Service</u>	<u>Service Improvement Threshold</u>
90 minutes or more	200%
60-89 minutes	100%
45-59 minutes	75%
30-44 minutes	50%
1-29 minutes	25%

The varying threshold approach recognizes the need for efficiency and cost-effectiveness in the tender of services by the public transportation provider for the competitive bid. The establishment of an inflexible standard would be expensive for the public providers if they were to be forced to adhere to it. For example, if a strict 25 percent benchmark was to be mandated, the public provider would have to bid every service improvement that exceeded it. Thus, if a route which is operated with only two buses were to have a third bus added as a frequency of service improvement, from a 60-minute to a 40-minute headway, this would represent a 50 percent increase in service hours. Consequently, under a strict 25 percent threshold, this relatively small piece of service would have to be placed for competitive tender. For a large system, in which such minor service changes would be routine, it would prove highly

expensive and administratively inefficient to prepare bid documents and manage the competitive tender process for each and every one of these minor service changes.

The sliding thresholds based upon varying levels of existing service and service improvements would allow for economies of scale logically linked to existing service structures. Subsequently, public operators can package truly significant service restructurings into worth while competitive bidding opportunities for private operators. These competitive tenders would thus be of a scale so as to attract a variety of bidders. Also, they would allow for the public operators to prepare and administer a reasonable number of significant competitively tendered projects versus an unreasonably large number of relatively insignificant projects that would fail to solicit a strong response from prospective bidders.

The second step in the process is soliciting provider interest in the operation of those services identified as opportunities for their involvement. The inventory of providers will be utilized to solicit interest. Proposals will be evaluated by the public operator using a cost methodology which places all those proposals received on an equal footing. The public operator shall pursuant to UMTA guidelines, determine its full cost of the service prior to opening bids/proposals from eligible operators using the same cost methodology, so as to compare the bids submitted with the public operator's cost. The public operator will be responsible for monitoring contract compliance. The public operator will provide results/status reports to NOACA on an annual basis as part of the submission for the TIP.

If a public operator should conduct a demonstration project of limited scope, area of impact, and duration that exceeds the appropriate threshold requirement regarding mileage or revenue hours, the project shall not be construed as new or restructured service only under the following circumstances: (1) That it is a declared demonstration project; and

(2) The project lasts no longer than twelve months without providing eligible transit operators the opportunity for competitive involvement in the project.

### Section III: Periodic Examination of Existing Transit Services

UMTA requires a periodic examination, at least every three years, of each route to determine if it could be more efficiently operated by a private enterprise.

After completion of these examinations, each agency using the provider inventory to solicit interest, will determine if such providers can provide any existing services. Each agency will provide NOACA with their analysis and any resulting recommendations.

The public transit system in Geauga County will conduct periodic reviews of existing services to assess potential competitive participation by providers, as required by the January 24, 1986 Federal Register Notice for Section 18 and Section 16(b)(2) Recipients. The Geauga County system will provide NOACA with the results/recommendations of its analysis as a matter of information.

### Section IV: TIP/AE Documentation

Public operators will provide sufficient information and/or access to such information to NOACA to enable the MPO to certify that the local process has been followed and to describe how the local process led to the development of the projects contained in the TIP/AE.

The TIP/AE documentation will contain:

- 1) A description of the involvement of the private sector in the development of the specific projects. The determination of whether service or support functions reflected in the annual

element are to be provided by a public or private provider can be arrived at through use of requests for proposals, invitations for bids, or other means in local planning process;

- 2) A description of the proposals received from the private sector and how they were evaluated;
- 3) A description of impediments to holding service out for competition and the measures taken to address the impact of such impediments; and
- 4) A description and status of private sector complaints.

#### Section V: - Dispute Resolution Process

The October 22, 1984 Federal Register requires the development of a local mechanism to resolve disputes on provider competition related issues. This process is required to ensure that disputes are resolved in a manner which ensures fairness to all parties. UMTA will entertain complaints only upon procedural grounds that the local planning and programming process has not established procedures for the maximum feasible competitive participation of providers consistent with Section 8(e) of the Urban Mass Transportation Act of 1964, as amended, and the spirit of UMTA's competitive participation policy; or that the local procedures were not followed; or that the local process does not provide for fair resolution of disputes. Accordingly, UMTA will not review disputes concerning the substance of local decisions regarding service or the appropriate service provider. Nor will UMTA entertain procedural protests prior to a disposition of complaints at the local level.

Since the publicly-owned transit systems are the primary operators of public transit service, and NOACA is the responsible entity for development of the TIP, both must have a major role in the resolution of disputes. It is recommended that Stage I of the process be a written filing

of the complaint with the public transit system (see Figure 1). The transit system shall notify NOACA of such complaints within fifteen (15) days. The complaint should identify the major area of concern, such as:

- 1) Failure to provide reasonable notice of proposed plans and programs;
- 2) Inadequate documentation of service requirements, i.e., lack of a fully detailed scope of services that includes costs and criteria;
- 3) Cost proposal comparison methodology issues; and/or
- 4) Contractual terms, changes, payment, problems.

The public transit operator shall review the complaint and prepare a response to the complainant within thirty (30) days of its filing. The public transit operator will provide NOACA with a copy of the response at the same time.

If the complainant is not satisfied with the resolution at the end of Stage I, then the complainant files a written appeal to NOACA within 30 days of the delivered response. This begins Stage II of the process, and it initiates the appeal resolution process.

Appeals will be heard by an arbitrator chosen by the American Arbitration Association. The complainant will bear the costs of the arbitrator. Transit Agencies will continue operations while the dispute is being arbitrated. If the transit agency and complainant are satisfied by the arbitration findings, then the issue will be considered resolved. If they are not satisfied with the findings, the transit agency or complainant may appeal to the appropriate federal or state agency.

**Figure 1:**

**LOCAL COMPLAINT RESOLUTION PROCESS  
FOR COMPETITION-RELATED DISPUTES  
INVOLVING SERVICE AND OPERATIONS ISSUES ONLY**

<b>● STAGE I:</b>	<b>ESTIMATED DAYS PER STEP</b>
1.) WRITTEN FILING OF COMPLAINT WITH PUBLIC TRANSIT SYSTEM.	0-15
2.) NOTICE TO NOACA BY TRANSIT AGENCY.	0-15
3.) TRANSIT AGENCY REVIEWS COMPLAINT AND DELIVERS RESPONSE TO COMPLAINANT AND NOACA.	0-30
<b>● STAGE II:</b>	
1.) IF COMPLAINANT IS NOT SATISFIED WITH THE RESULTS OF STAGE I, THE COMPLAINANT FILES A WRITTEN APPEAL TO NOACA WITHIN 30 DAYS OF THE DELIVERED RESPONSE.	0-30
2.) APPEAL COMMITTEE HEARING	0-30
3.) APPEAL COMMITTEE FINDINGS ISSUED	0-30
4.) IF TRANSIT AGENCY AND COMPLAINANT ARE SATISFIED WITH THE COMMITTEE FINDINGS, THE ISSUE IS RESOLVED. IF NOT, THE FOLLOWING APPEALS ARE POSSIBLE: FOR GCRTA AND LAKETRAN, THE APPEAL IS TO UMTA; FOR LCT AND ACCESS NETWORK, THE APPEAL IS TO ODOT; AND FOR BTA THE APPEAL IS TO GCRTA.	N/A