



MILWAUKEE COUNTY TRANSIT SYSTEM

2014 TITLE VI UPDATE

August 1, 2014

MCTS 2014 TITLE VI UPDATE

This document is a collection of various memos and reports relating to MCTS’ ongoing efforts to:

- Ensure that public transportation services are provided in a non-discriminatory manner
- Promote full and fair participation in public transportation decision making without regard to race, color, or national origin
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency

Because this update is a collection of various documents, each with their own numbering system, a unified numbering system will appear in the upper right corner of each page in this binder for the reader’s convenience. These numbers will be prefixed with an “A” and will correspond with the page numbers shown below.

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**Milwaukee County Transit System
Interoffice Memorandum**

TO: File

FROM: Mark McComb

SUBJECT: Title VI Notice to the Public

DATE: July 31, 2014

The Federal Transit Administration (FTA) requires transit providers display a notice to the public informing customers of their rights under Title VI. At a minimum, this notice must be posted on Milwaukee County Transit System's (MCTS) website, and in the public areas of MCTS' offices and facilities.

An example of MCTS' notice to the public is shown on the next page. This notice is available on MCTS' website (www.ridemcts.com/about-us/title-vi-policy), in the lobby of MCTS' administration building, and in the vestibules of MCTS' operating stations which are open to the public. This notice is also displayed in the MCTS transit guide, on public timetables (when space permits), and on board MCTS' buses.

This notice is also available in Spanish, the language spoken by the Limited English Proficient (LEP) population that meets the Safe Harbor Threshold in the Milwaukee area.

Title VI Policy • Title VI of the Civil Rights Act of 1964



"No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

The Milwaukee County Transit System (MCTS) respects civil rights and operates its programs and services without regard to race, color or national origin. MCTS is committed to complying with Title VI requirements in all of its programs and services. For more information on the Title VI transit obligations, contact MCTS as listed below:

MCTS Human Resources Department
1942 North 17th Street
Milwaukee, WI 53205
(414) 344-4550

Making a Title VI Complaint

Any person who believes he/she has been subjected to discrimination in the delivery of or access to public transportation services on the basis of race, color or national origin, may file a complaint with Milwaukee County Transit System (MCTS). Such complaint must be filed in writing with MCTS no later than 180 days after the alleged discrimination. [You can file your complaint using this form](#) (you may need to [download Adobe Acrobat Reader](#) to view.) Once completed, you can print the form and mail to MCTS at the address below.

For more information on how to file a complaint, contact MCTS as listed below:

MCTS Human Resources Department
1942 North 17th Street
Milwaukee, WI 53205
(414) 344-4550
Title6@MCTS.org

Política del Título VI

"No se le negará a ninguna persona que resida en Estados Unidos la participación o beneficios, por motivo de su raza, color u origen nacional, ni será discriminada en ningún programa o actividad que reciba asistencia financiera federal".

Milwaukee County Transit System (MCTS) respeta los derechos civiles y opera sus programas y servicios independientemente de la raza, el color u origen nacional. El MCTS se compromete a cumplir con los requisitos del Título VI en todos sus programas y servicios. Para obtener más información acerca de las obligaciones de tránsito contenidas en el Título VI comuníquese con el MCTS como se indica a continuación.

CÓMO REALIZAR UN RECLAMO CONFORME AL TÍTULO VI

Toda persona que crea que ha sufrido un acto de discriminación al momento de prestársele o de recibir el servicio de transporte público en base a su raza, color u origen nacional puede presentar un reclamo al Milwaukee County Transit System (MCTS). El reclamo debe presentarse por escrito al MCTS antes de transcurridos 180 días posteriores al supuesto acto de discriminación. Para obtener más información acerca de cómo presentar un reclamo, comuníquese con el MCTS como se indica a continuación:

MCTS Human Resources Department
1942 North 17th Street
Milwaukee, WI 53205
(414) 344-4550
Title6@MCTS.org

MILWAUKEE COUNTY TRANSIT SYSTEM (MCTS)

Title VI Complaint Procedures

Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color or national origin may file a written complaint with the Human Resources Department, Milwaukee County Transit System, 1942 North 17th Street, Milwaukee, WI 53205. Complainants have the right to complain directly to the appropriate Federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the MCTS representative may be utilized for resolutions.

PROCEDURE

1. The complaint must include the following:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The MCTS representative will interview the Complainant and assist the person in converting verbal complaints in writing. All complaints must, however, be signed by the Complainant or his/her representative.
 - b. Include the date(s) of the alleged act of discrimination.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal law requires complaints be filed within 180 calendar days of the alleged incident.
2. Upon receipt of the complaint, the MCTS representative will determine its jurisdiction, acceptability, need for additional information, and investigate the complaint, if accepted.
3. The Complainant will be provided with a written acknowledgment that MCTS has either accepted or rejected the complaint.
4. A complaint must meet the following criteria for acceptance:
 - a. The complaint must be filed within 180 days of the alleged occurrence.
 - b. The allegation must involve a covered basis such as race, color or national origin.
 - c. The allegation must involve a MCTS service, the County of Milwaukee as a Federal-aid recipient, or its sub-recipient.
5. A complaint may be dismissed for the following reasons:
 - a. The Complainant requests the withdrawal of the complaint.
 - b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The Complainant cannot be located after reasonable attempts.

6. MCTS representative will prepare an investigative report within 90 calendar days of the acceptance of the complaint. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
7. The investigative report and its findings will be reviewed with MCTS officials and in some cases the investigative report and findings will be reviewed by MCTS' legal counsel.
8. The MCTS representative/legal counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows:
 - a. In the event MCTS is in noncompliance with the Title VI regulations, remedial actions will be listed. MCTS will take necessary action in order to come into compliance.
 - b. If the investigation concludes that MCTS is not in violation of Title VI, findings describing compliance will be documented.
9. Notice of the MCTS representative's determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
 - a. The MCTS representative will reconsider the determination if new facts come to light.
 - b. If Complainant is dissatisfied with the determination and/or resolution set forth by the MCTS representative, the same complaint may be submitted to the FTA for investigation. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, 200 W. Adams Street, Suite 320, Chicago, IL 60606, telephone 312-353-3855.
10. A copy of the complaint and the MCTS representative's investigation report/letter of finding and Final Remedial Action Plan, if appropriate, will be issued to FTA within 120 days of the receipt of the complaint.
11. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.



MCTS Title VI Complaint Form

Title VI of the 1964 Civil Rights Act and related nondiscrimination statutes and regulations require that *no person in the United States shall, on the grounds of race, color, national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.*"

The following information is necessary to assist us in processing your complaint. Assistance is available upon request. If information is needed in another language, then please contact us at 414-937-3218 or Title6@mcts.org.

Please complete and return this form to the following: Human Resources Department Milwaukee County Transit System, 1942 North 17th Street, Milwaukee, WI 53205-1697, or email to Title6@mcts.org.

1. Complainant's Name _____

2. Address _____

3. City _____ State _____ Zip _____

4. Telephone Number (home) _____ (business) _____

5. Email Address _____

6. Person discriminated against (if someone other than the complainant)

Name _____

Address _____

City _____ State _____ Zip _____

7. In your own words, describe your complaint. You should include specific details such as names, dates, time, route numbers, witnesses and any other information that would assist us in our investigation of your allegations. If you have additional documentation related to this complaint, please include as an attachment. Please use the back of this form if additional space is required.

8. Have you filed this complaint with any other federal, state or local agency; or with any federal or state court? Yes No

If yes, check each box that applies:

Federal agency Federal court State agency State court Local agency

9. Please provide information about a contact person at the agency/court where the complaint was filed.

Name _____

Address _____

City _____ State _____ Zip _____

Telephone Number _____ Email address _____

10. Signature required below.

Complainant's Signature Date

**MILWAUKEE COUNTY TRANSIT SYSTEM
SUMMARY OF TITLE VI COMPLAINTS
2012 - 2014**

NAME OF COMPLAINANT	DATE FILED	NAME OF AGENCY PROCESSING COMPLAINT	BASIS OF COMPLAINT	ALLEGATION(S)	INVESTIGATION STATUS/ ACTION TAKEN	STATUS
Francisco Urbina	9/06/2013	MTS, Inc.	Race, Disability	Bus stop at Marian Center on Route 51 is non-ADA compliant & hazardous (alleges bus stop was not shoveled during winter)	Internal investigation completed, no merit found that bus stop is non-ADA compliant or that Complainant's access to transit services were adversely impacted based on race, color or national origin.	Complainant advised of determination October 13, 2013.

**Milwaukee County Transit System
Interoffice Memorandum**

TO: File

FROM: Abigail Ofori-Amoah

SUBJECT: Title VI Public Participation Plan

DATE: July 18, 2014

Introduction

MCTS exists to provide reliable, convenient, and safe public transportation services that effectively meet the varied travel needs of the community and contribute to its quality of life. We make connections daily by getting our customers to their destinations. In efforts to provide the best service to our community we are taking more measures to gain input and feedback from those we dedicate our service to.

MCTS is taking the initiative to involve the public in creating a community involvement strategy that will be an inclusive process to improve and support our existing transit system. Getting public feedback is a critical first step towards providing meaningful and appropriate service, and formulating a final public participation plan that meets the public's needs and expectations. Particular emphasis will be given to involving under-represented/served population and neighborhoods in the greater Milwaukee community. This plan will aid MCTS staff in the process of designing meaningful outreach efforts regarding the public participation process. Our goals for engaging the public in the planning process are the following:

- Providing a wealth of knowledge and information to the public
- Effectively communicate to the public of future changes to the existing transit system
- Gain insight and input from the public to inform planning decisions.

It is important to note that the implementation of a public participation plan in accordance to Title IV requirements will continue to be an evolving process. With each year, the previous year's activities will be built upon and refined. After public comments have been obtained, a recommendation will be brought forward for approval by the Milwaukee County Board of the formalized participation process. The plan primarily seeks to collect public input on MCTS' policies for major service changes, community

needs as well as providing a baseline for general knowledge pertaining to MCTS operations. Comprehensive public involvement is pivotal to the success of the transportation planning process. In order to understand the concerns of Milwaukee County Transit System's users, public participation must involve a variety of stakeholders to ensure perspectives are heard and leveraged toward the MCTS decision-making process.

This strategy will help us to achieve various levels of Public Engagement:

(According to the International Association for Public Participation)

- **Inform:** To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.
- **Consult:** To obtain public feedback on analysis, alternatives and/or decisions.
- **Involve:** To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.
- **Collaborate:** To partner with the public in each aspect of the decision including the development of alternatives and the identification of a preferred solution.
- **Empower:** To place final decision-making in the hands of the public.

All of these components will be an important part to achieve of our immediate goals and plan for transit in the future.

The Planning Phases

Because MCTS wants to ensure that the public is effectively involved in helping shape the final plan, MCTS will be finalizing many of the engagement details (such as locations, dates, and times) in the latter half of 2014. The following phases provide an overview of the planning process:

Phase 1: Early Planning (Early 2014-Mid 2014)

Identifying Transit riders

- Stakeholders /Taxpayers
- Disabled individuals
- African Americans, Hispanic, Hmong, Other Groups
- Limited English proficient populations
- Elderly
- Business leaders
- Universities & University students
- Local Elected officials
- Southeastern Wisconsin Regional Planning Commission
- Federal Transit Administration

Other Tasks during this phase:

- Develop a framework for meetings and soliciting feedback
- Define meeting topics and focus areas
- Assign critical roles to involved staff

Phase 2: Engage the public in the planning process (Late 2014)

- Create an outline of expectations and goals from public meetings.
- Develop a meeting calendar and public announcement process.
- Construct meeting formats, materials and outreach plan to inform public of upcoming meetings.

Phase 3: Draft a Public Participation Plan and present it to the public for feedback (late 2014-early 2015)

Phase 4: Finalize MCTS Public Participation Plan (early 2015)

Outreach Activities and Education

In order to accomplish the stated goals, MCTS must conduct appropriate tasks and activities to most effectively collect and integrate public input.

Public Meetings/Forums

The meetings will include an educational component on the feedback being sought. The education piece will be accompanied by surveys designed to allow the public to select responses that are reflective of their interests and needs. The format of the meetings will involve poster presentations, question/answer by MCTS staff and language interpretation service. The overall flow of the community meetings should be loosely regulated. Attendee's should not feel pressured; however, there should be a general flow during the meeting process that helps keep attendees on track.

- Facilities
 - i. Any facility selected should account for maximum accessibility.
 - ii. Facilities for meetings should be easily accessible to transit locations as well as provide ample parking.
- Time Range and meeting dates: Meetings should be scheduled in both the afternoon and evening to ensure people working different shifts can attend.
- Geographic Location
 - i. Meetings will be located in various parts of city for allowable access to, all groups. Locations may vary based on what region of the county will be the focus. Meetings will be held to allow for flexibility for individuals to attend at their specified locations when determined
 - ii. MCTS will continue to development a framework for meetings and the scheduling.

Workshops

Focus Groups: Will provide for a way to get in-depth information about issues, perceptions, and needs for various neighborhoods. Detailed responses from volunteers will help the planning department to make informed decisions.

Special Events

Interactive and Visual Tools

- Maps and Photos that simulate proposed projects

- Proposals
- Completed or ongoing projects reviewed.
- Before and after scenarios of proposed changes

Materials and Publications (To be collaborated with Marketing department)

- Newsletter
- Bus Lines Mailer
- Website updates-Public feedback portal
- Summary report of feedback
- Press Release
- Attendance Tracking
- Feedback response process
- Social Media Updates

Evaluation of Participation Efforts

Following a major planning effort an evaluation will be completed of the public participation process. The evaluation will assess the techniques used and conclusions summarizing the overall process and areas to seek improvements. (Adopted from SEWRPC Public Participation Plan)

Sample Meeting Agenda

&

Press Release

MCTS Public Meeting:
Seeking Feedback on Public Involvement
(To be edited accordingly)

Public Participation Plan Agenda
(Date)

Handouts & Surveys

- Welcome/About this Meeting (One Page)
- Goals, major changes, new routes, transit planning process

Station 1: Introduction

- 1) Welcome
- 2) About This Meeting
- 3) Public Participation

Central Station:

- Organizational Structure
- 2014 Milwaukee County Transit Guide
- MCTS Operational Information

Station 2: Major Service Changes

- 4) MCTS Major Service Changes
 - 5) MCTS Major Service Change Policy
- *Drop off survey

Station 3: Public Participation Approach

- *Drop off Survey

Station 4: Conclusion

- 9) Thank You
- *Drop off survey & pick up upcoming MCTS info (AVA, real-time, fare box, etc.)

Meeting Deadlines

DRAFT MEDIA RELEASE

TBD

Contact: TBD

Contact:#

MCTS ANNOUNCES PUBLIC MEETING
Seeking Feedback on Public Participation Plan
 (To be edited accordingly)

MILWAUKEE, WI – Milwaukee County Transit System (MCTS) has scheduled a series of public meetings to solicit feedback on public participation in the planning process of transit services. As a public agency that receives funding from the Federal Transportation Administration (FTA), MCTS must adhere to service policies of Title VI of the Civil Rights Act of 1964. On (Enter Date) MCTS will present the public with proposed approach to better engage the public on current and future MCTS projects.

MCTS will present: (meeting topics)

MCTS Public Meeting Schedule and Locations:

(Date, Location, Time, Frequency)

The public is encouraged to attend the interactive public meetings. Attendees will be able to visit displays that explain individual goals and MCTS personnel will be present to gather feedback and answer questions. Regarding the importance of attendance, Sandy Kellner, MCTS Chief Operating Officer stated, “It is our goal to ensure fair and equitable transit service and receiving public feedback is key to helping MCTS update guidelines for when a change in service or fare will affect our riders.”

Feedback from the public will be combined with an in-depth analysis of MCTS’s current service and practices to be shared with the Milwaukee County Board in the form of a policy recommendation. Upon approval from the board, MCTS will have a comprehensive, publicly planned process.

If you are unable to attend the meeting and would like more information, visit RideMCTS.com to view meeting materials, or call 414-344-4550 and ask for (Contact Info) Feedback about Title VI policies may be made in writing to: Planning Department – (Contact, Milwaukee County Transit System, 1942 N. 17th Street, Milwaukee, WI 53205 or by visiting <http://ridemcts.com/about-us/contact-us/suggestions-feedback/> and filling out the online form.

The meeting sites are accessible by wheelchair. With advance notice of five business days, MCTS can make special accommodations for persons with disabilities, limited English speaking ability, or persons needing auxiliary aids or services including interpreters for the public sessions. Call (Enter point of contact) to request special accommodations.

**Milwaukee County Transit System
Public Outreach and Involvement Activities**

Subject Matter	Sponsor	Forum	Date	Location
2012				
Chat with the Chair	County Board Chair - Dimitrijevic (and other supervisors)	Public information/input (18)	Jun-Dec 12	Various locations
Proposed 2012 Program of Projects	County Board TPWT Committee	Public hearing	7/11/2012	Milwaukee County Courthouse
2013 Budget	County Board Supervisors (9)	Budget Listening Sessions & Town Hall Meetings (14)	Oct & Nov 12	Various locations
2013 Budget	County Board of Supervisors	Public hearing	10/29/2012	Milwaukee County Courthouse
2013 Budget	County Board of Supervisors	Public hearing	10/29/2012	Marcus Center
2013 Section 85.21 grant application	County Board TPWT Committee	Public hearing	12/5/2012	Milwaukee County Courthouse
2013				
Proposed 2013 Program of Projects	County Board TPWT Committee	Public hearing	6/5/2013	Milwaukee County Courthouse
2014 Budget	County Board Supervisors (6)	Budget Listening Sessions & Town Hall Meetings (11)	Apr & Oct 13	Various locations
Title VI Policies	MCTS	Public information/input	10/1/2013	Center Street Library
Title VI Policies	MCTS	Public information/input	10/8/2013	Milwaukee Central Library
2014 Budget	County Board of Supervisors	Public hearing	11/4/2013	Milwaukee County War Memorial
2014 Section 85.21 grant application	County Board TPWT Committee	Public hearing	12/4/2013	Milwaukee County Courthouse
2014				
Proposed 2014 Program of Projects	County Board TPWT Committee	Public hearing	5/7/2014	Milwaukee County Courthouse
New MCTS MCTS Fareboxes/AVA/RTPI	MCTS	Public outreach (15)	Mar-Jul 14	Various locations

Section 4: Milwaukee County Transit System 2014 Limited English Proficiency Plan

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II. Introduction

Per Circular 4702.1B, “Title VI and Title VI-Dependent Guidelines for FTA Recipients”, the Federal Transit Administration (FTA) requires that recipients and sub-recipients of federal funding take responsible steps to ensure that persons with limited English proficiency (LEP) are afforded meaningful access to services, programs and activities.

This document provides details of an extensive effort undertaken by the Milwaukee County Transit System for ensuring meaningful access to public transportation for those individuals who have limited English-speaking skills. It includes a language assistance plan to guide implementation efforts for the LEP population.

III. Relevant Guidance

Throughout the preparation of this plan, several resources were referenced in order to ensure compliance and development of a comprehensive plan. Some of the resources utilized are listed below.

<http://www.justice.gov/crt/about/cor/Pubs/eolep.php>

“Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency”, August 11, 2000.

<http://www.dotcr.ost.dot.gov/asp/lep.asp>

U.S. Department of Transportation Civil Rights, Limited English Proficiency

<http://www.lep.gov/resources/selfassesstool.htm>

Limited English Proficiency – A Federal Interagency Website

http://www.fta.dot.gov/documents/LEP_Handbook.doc

“Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons. A Handbook for Public Transportation Providers”. Prepared by The Federal Transit Administration Office of Civil Rights, April 13, 2007.

http://dwd.wisconsin.gov/det/civil_rights/participant_guide_06/crc_subject_matter_reference.pdf

Civil Rights Compliance in Service Delivery Training: Subject Matter Reference Guide.

<http://www.lep.gov/ISpeakCards2004.pdf>

Printable version of US Census “I Speak Cards”.

IV. LEP Needs Assessment: Four Factor Analysis

The Title VI Plan submitted in 2011 contained a plan for conducting the four-factor analysis to assist in understanding and addressing the needs of the LEP population. This comprehensive analysis was initiated in 2009 and updated to its present form in 2014. The following information outlines the progress of that analysis and presents the findings that resulted.

A. FACTOR 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

(a) How LEP persons interact with the recipient's agency;

MCTS researched and reviewed information kept by MCTS on past interactions with members of the public who are LEP. This included an analysis to determine the extent to which LEP persons have come into contact with the various divisions of MCTS.

***Results:** The analysis of past contact examined four areas of customer contact including, Administration front desk, Information Center, Customer Service phone line, and Paratransit office. All areas reported very limited LEP contact, with Spanish as the noted language. Only the Paratransit office had any recollection of LEP contact in a language other than Spanish (Russian was cited). The use of a tracking form/survey was developed for continued monitoring capability.*

(b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;

(c) The literacy skills of LEP population in their native languages, in order to determine whether translation of documents will be an effective practice;

(d) Whether LEP persons are underserved by the recipient due to language barriers

***Results:** Four community-based organizations that provide social services to the Spanish-speaking population in Milwaukee County worked with MCTS to provide crucial information about the LEP populations in Milwaukee. In 2014 after MCTS completes the launch of three important new technologies, MCTS will conduct*

another survey with these four agencies and also approach 10 other community groups.

Organizations

United Community Center

Archdiocese of Milwaukee, Office for Multicultural Services

Council for the Spanish Speaking, Adult Education Program

Council for the Spanish Speaking, Housing Department

B. FACTOR 2: The frequency with which LEP persons come into contact with the program.

- a) Customer service interactions
- b) Ridership surveys

(a) Customer service interactions

Information was gathered from interviews with MCTS staff that typically come in contact with LEP persons. The same individuals/departments identified in the first task were polled for this information.

Results: *MCTS conducted internal surveys to assess the degree to which LEP persons are likely to encounter a transit program, activity or service. Very limited LEP contact in the past has been identified. Through this research, it was revealed that LEP persons are encountered fairly infrequently.*

Customer service representatives receive 10-20 requests per year; Front desk at the administrative building 1 request per year; Ticket Agents (two operating stations) 50 requests per year; In each of the instances summarized above, the requests have been limited to Spanish language. Also in each case, an MCTS employee with Spanish speaking skills or a contracted Language Service Provider was available to assist and ultimately satisfy the request. Only the Paratransit office had any recollection of LEP contact in a language other than Spanish (Russian was cited).

Notably, the internal surveys conducted up to now have been somewhat informal. However, they serve as a good basis for understanding the LEP groups utilizing our service and the frequency of contact. That being said, MCTS has taken steps to formalize the information gathering process, which is discussed later in this document. MCTS staff has prepared a web-based survey for future tracking/monitoring of contacts with LEP individuals. An internal on-line survey form has been developed and is accessible companywide.

(b) Ridership Surveys;

Results: *Two of the four community-based organizations indicated that their clientele rarely inquired about or expressed a need for transit. In contrast, one organization reported frequent use of 5 of the 11 routes that service the Spanish-language LEP population concentration area. Survey response rates among the four organizations varied from a low of 23% to a high of 75%. Transit usage among survey respondents ranged from a low of 36% to a high of 79%.*

Each community organization provided insight into engaging with the LEP population. A Spanish-language questionnaire was the preferred method of engagement. As a result, 650 surveys were distributed by the partner organizations with just over half completed and returned. Among the completed surveys, nearly half were from individuals who use MCTS service. Open-ended questions related to MCTS service covered the following topic areas:

- *General transit usage*
- *Routes/schedules*
- *Communications materials*
- *Fares/tickets*
- *Safety & security*

Based on input from community organizations, focus groups were not utilized. Instead only surveys were used. In addition to distribution of the Spanish language questionnaire by the community organizations, MCTS distributed the same survey directly. The response rate was significantly less using this method of distribution than the response to the community organization issued survey.

As mentioned above, another survey will be completed at the end of 2014.

C. FACTOR 3: The nature and importance of the program, activity or service provided by the program to people’s lives.

1. **Identify MCTS’ most critical services.** MCTS reviewed and identified programs and activities that would have serious consequences to individuals if language barriers prevent a person from benefiting from the activity. The impact on actual and potential beneficiaries of delays in the provision of LEP services was also considered.

Results: *Staff identified the following areas as critical to using transit services with ease.*

Knowing how to ride the bus including:

- *How to know which bus to take;*
- *How to pay the fare;*
- *Where to buy tickets/passes, and;*
- *Accessibility issues.*

Access to informational materials and services such as:

- *Route guides and schedules;*
- *Contacting MCTS by phone;*
- *Customer Service call centers including TTY;*
- *Transit Guide containing overall system map, how to ride the bus and how to read a route guide information, and;*
- *Important route updates offered through passenger announcements, website, signs and newsletter.*

Security Measures:

- *Importance of reporting problems on the bus to the bus operator.*

Knowledge of the rules of behavior including:

- *Passenger rights and responsibilities, and;*
- *What is not allowed on buses – no open food or beverage, no loud music or cell phone usage, no littering.*

2. Review input from community organizations and LEP persons.

Results:

Printed schedules are a primary source of information and yet pose a consistent obstacle for LEP persons. A detailed How to Ride Guide in Spanish was produced and distributed to Spanish Community Centers.

Use of the website and information phone line continues to be minimal among LEP persons.

An understanding of fares and appropriate usage of fare media does not appear to be an issue area for LEP persons. However, this information is detailed in the How to Ride Guide. Additionally, all buses have detailed fare information in Spanish.

The passenger Bill of Rights is now in Spanish on all buses. In 2014, a detailed security pamphlet will be produced in Spanish to explain MCTS security procedures. This was recognized as a need in the customer surveys - how to appropriately respond to critical safety/security issues.

D. FACTOR 4: The resources available to the recipient for LEP research, as well as the associated costs associated with that outreach.

1. Inventory language assistance measures currently being provided, along with associated costs

Results: Several Spanish-language information items have been produced and distributed. These include:

- *Bienvenido – Spanish How to Ride Guide - a more expansive general brochure explaining how to ride the bus. At a cost of approximately \$8,000 for 20,000 brochures, this item was distributed in display racks throughout the community and sent to community groups. This brochure will be revised to include updated information about the new fare system.*
- *Transit Guide – has Spanish information explaining what and where to get the Spanish How to Ride Guide. It also has information in Spanish on how to file a Title VI complaint. Cost: just translation – roughly \$100 – since this is a collaborative piece.*
- *On board Passenger Rights – Cost approximately \$900*
- *On board Passenger Fares – Cost approximately \$900*
- *On board decals of safety information and rules of the bus – Collaborative piece – no specific costs*
- *On board How to Make a Title VI complaint – Cost approximately \$900*
- *Safety tips card that provided bus rules and traveling tips. It was distributed on buses in 2007 under the “See Something, Say Something” security campaign at a cost of approximately \$4,000 for 10,000 cards.*

2. Determine what, if any, additional services are needed to provide meaningful access.

Results: The following items should be addressed to improve access to our programs and activities:

- *Provide Spanish-language ads on Routes Guides to announce the availability of the Spanish-language How to Ride Guide;*
- *Real-Time Information Brochure is being translated into Spanish*
- *Produce a security/safety tip card, and;*
- *Distribute Spanish-language How to Ride Guide to additional locations.*

3. Analyze our budget

Results: Based upon MCTS’ experience with LEP populations, it is determined that base level measures, such as document translations, must be in place for the Spanish-speaking population. Converting English documents to Spanish costs between \$80-150 per one sheet. Additional budgetary resources may be needed in the event that demand occurs among other LEP population groups. It should

be noted that the community groups who assisted us with distributing the surveys were asked for translating assistance. All stated that they do not have the time and/or resources to assist with this.

Currently, there is not a separate account dedicated to addressing the identified LEP needs. However, MCTS has ensured funds are directed for this purpose and will continue to allocate funds, as needed for continued LEP improvements. MCTS will monitor and dedicate resources as needed.

4. Consider cost effective practices for providing language services

Results: *Prior to November 2013, the extent of MCTS' foreign language interpretation capabilities was one employee in the administration building handling infrequent Spanish-speaking customer service calls as a side duty whenever needed. No other employee had significant foreign language skills, a problem when a customer with limited English proficiency needed our services at any of our stations or the administration building.*

In November 2013, MCTS implemented Certified Languages International to service all foreign language interpretation needs. Their agents are available 24 hours a day, seven days a week in virtually any language in the world. Spanish-speaking translation services cost \$0.99 per minute while all other languages cost \$1.45 per minute. Instituting this service across all departments within the organization has increased our level of customer service proficiency, especially to Milwaukee County's growing Spanish-speaking population. Our professionalism and image in the community have improved because we are no longer turning away limited English speakers—we now have a resource to help us communicate with every single customer.

To date we have totaled 53 Spanish-speaking translation minutes at a cost of \$52.47. That number is sure to increase in the coming years as we accommodate all customers in order to serve their public transit needs.

V. Language Assistance

MCTS has developed a comprehensive strategy to provide meaningful access to LEP populations based on results from the four-factor analysis. This summarized in the following **Table 1**. The identification and assessment of LEP individuals within the service area is well documented and involves the latest available Census data. This assessment process has also set the stage for establishing a strong network of community groups and effective communication with LEP groups in the MCTS service area. This communication, which is an essential component of the plan, has guided MCTS towards specific actions. At present those efforts will focus on the Spanish-language LEP population. Several actions have already been implemented and many more are in the works. In the next several months to year, MCTS will place emphasis in the area of staff training.

TABLE 1

MCTS Checklist for Ensuring Meaningful Access to LEP Populations

	Action Item	Start Date	Complete	Review Annually
Identifying & Assessing LEP Needs				
1	Develop LEP Plan Outline	2008	X	
2	Conduct Four-factor Analysis	2009	X	
3	Community Outreach: Conduct surveys and/or focus groups	2009	X	X
4	Consider if additional language groups need assistance measures	2009	X	X
5	Develop a contact list of agencies with overlapping jurisdictions; Determine what level of LEP research and resource sharing is possible	2015		X
Language Assistance Measures				
1	Create Community Outreach Surveys and Summarize Results	2009	X	
2	Review Community Outreach Efforts	2009	X	X
3	Prepare employee survey for monitoring LEP contacts	2010	X	
4	Informally survey employees for assessing LEP contact frequency	2008	X	
5	Distribute employee survey for monitoring LEP contacts	2011		
6	Refine procedures for improved tracking of LEP contacts specific to functional areas (examples: ticket office clerks, bus operators, dispatchers, paratransit office, etc.) 2011	2011		X
7	Develop internal MCTS "LEP" web-page for employees	2011		
8	Incorporate topic of LEP goals/procedures into New Bus Operator Orientation and New Employee Orientation	2012		X
9	Develop Incident Code for Bus Operators to report LEP Contacts	2012		
10	Conduct inventory of employees who have bilingual skills	2012		X
11	Add links to website: Title VI complaint form and procedures	2011		
12	Prepare Spanish-language brochure with bus rules, safety & traveling tips	2008	X	X
13	Determine which MCTS documents are considered "vital documents"; stay aware of new documents that may be considered "vital"	2011	X	X
14	Post bilingual instructional decals on buses	2009	X	
15	Ensure procedures are available for translation after office hours	2008	X	

16	Translate additional documents into Spanish (i.e. individual route schedules)	2012		X
17	Follow up with key staff to ensure Title VI measures are being effectively communicated. Re-assess/revise internal measures as needed	2012		X

Providing Notice to LEP of the Availability of Language assistance

1	Add notice of Title VI policy and contact information on printed MCTS materials	2011	X	
2	Translate Title VI complaint form and procedures document into Spanish	2011		

Staff Training

1	Prepare & disseminate general LEP & Title VI information to employees	2011		
2	Familiarize key staff with LEP resources (I-speak Cards, translation websites, etc.)	2011		X
3	Conduct meetings for key staff on LEP goals and expectations	2011		X
4	Implement/share access to internal "LEP Resource" web-page	2011		
5	Distribute procedural guidance on LEP, specific to functional areas (see below)	2011		X
5a	Bus Operators	2011		
5b	Ticket Clerks (Transportation & Cashiers' Staff)	2011		
5c	Dispatchers	2011		
5d	Information Agents & Customer Service Reps	2011		
5e	Front Desk Clerk and Lost & Found Clerk	2011		
5f	Schedule and Planning, Marketing Staff	2011		
5g	Paratransit Staff	2011		
5h	Risk Management Staff	2011		
5i	Human Resources, Labor Relations	2011		

Monitoring and Updating the Plan

1	Summarize & review LEP experiences annually	2009	X	X
2	Update maps when new Census/ACS data become available	2008	X	X

VI. Monitoring and Updating the Plan

MCTS recognizes that in order to achieve success, there must be a base level of awareness throughout the organization regarding LEP and Title VI goals and responsibilities. Employee education and awareness will evolve, and so may the LEP needs. That is why regular monitoring of the LEP needs and measures employed will be necessary. MCTS is intent on carrying out this plan designed to ensure that all individuals can benefit from the services provided.

A. Current Measures

MCTS has already successfully incorporated a variety of strategies for meeting the needs of LEP individuals in the service area including the following:

Document Translations:

- Brochure: “Bienvenido” in Spanish - A general informational brochure was developed and distributed at informational racks throughout the service area.
- Planning Surveys: On-board customer surveys have been translated into Spanish. These surveys, written in English on one side and Spanish on the other, are designed to obtain customer feedback in order to improve overall effectiveness of bus service.
- Title VI Policy: Statement of policy and procedures for making a Title VI complaint is printed in English and Spanish onboard buses and in the overall Transit Guide
- Survey of Spanish speaking customers – A survey was conducted to nearly 400 Spanish-speaking individuals through community groups.
- Translation – When an individual contacts MCTS with a request in Spanish, there are designated employees at various work areas who will assist with the request during office hours.
- After Office Hours – If an individual requires language assistance after the office is closed, Dispatch office is notified and they may then contact the local police department to request assistance. Currently, this is an infrequent occurrence and relatively informal. Therefore, there is no cost associated with this effort.
- Bilingual Instructions – MCTS added bilingual (English and Spanish) instructional decals on-board the buses. Examples include a notice to give up seats for a passenger who is disabled and how to use the bicycle rack.
- Internal Surveys - MCTS staff has prepared an internal web-based survey for future tracking/monitoring of contacts of LEP individuals MCTS is prepared to the address additional measures previously noted that would allow for continued success in providing meaningful access to LEP populations.

MCTS will monitor the demand for services by LEP populations and use this plan as a working guide. Updates to this plan will be mad as needed.

**Milwaukee County Transit System
Inter-Office Memorandum**

To: File

From: Tom Winter, Director of Schedule & Planning

Re: **Title VI - Minority Representation on Planning and Advisory Bodies**

Date: June 10, 2014

The Transit Services Advisory Committee (TSAC) and the Transit Plus Advisory Committee (TPAC) are two MCTS advisory committees that are comprised of non-elected members. Members are selected by officials on the Milwaukee County Board of Supervisors.

A list of the survey questions used to query members about their racial identify and/or ethnicity, a table depicting the racial breakdown of the committees, as well as efforts to encourage participation of minorities on those committees are shown below.

Questionnaire:

By self-identification, what is your ethnicity (cultural or national origin) and/or race? (You may choose to report more than one race to indicate racial mixture.)

- **Hispanic, Latino, or Spanish Origin**
A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- **White**
A person having origins in any of the original peoples of Europe, the Middle East or North Africa.
- **Black or African-American**
A person having origins in any of the black racial groups of Africa.
- **Native Hawaiian or other Pacific Islander**
A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- **American Indian or Alaska Native**
A person having origins in any of the original people of the North and South American Continent (including Central America), and who maintain tribal affiliation or community attachment.
- **Asian**
A person having origins in any of the original people of the Far East, Southeast Asia, or the Indian Subcontinent, including for example, Cambodia, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand or Vietnam.

Table 1: Racial Breakdown of the Membership of Advisory Committees

	Milwaukee County	Transit Service Advisory Committee*	Transit Plus Advisory Committee
Approved Membership Positions	n/a	10	13
Filled Membership Positions	n/a		12
Members Completing Survey	n/a		8
Hispanic, Latino, or Spanish Origin	13%		0
White	63%		3
Black or African-American	28%		5
Native Hawaiian or other Pacific Islander	0.1%		0
American Indian or Alaska Native	1.4%		1
Asian	4%		0

*Data was unable to be collected from the Transit Service Advisory Committee prior to document submittal. This information is scheduled to be collected at the next committee meeting.

County of Milwaukee Interoffice Communication

DATE: June 18, 2014
TO: Tom Winter, Director of Scheduling and Planning, MCTS
FROM: John Rodgers, Transportation Business Manager, MCDOT
SUBJECT: Milwaukee County Monitoring of Subrecipient Title VI Programs for the Federal Transit Administration Section 5310 Program within the Milwaukee Urbanized Area.

POLICY

This report is for informational purposes only.

BACKGROUND

In July of 2012, the new federal transportation authorization bill Moving Ahead for Progress in the 21st Century (MAP-21) was signed into law and combined two transit programs that were separate under the previous federal transportation authorization legislation – the Safe, Accountable, Flexible, Efficient Transportation Equity Act – A Legacy for Users (SAFETEA-LU). The former transit programs were:

- **Transportation for Elderly Persons and Persons with Disabilities Program (Section 5310)**, which provided federal funds to help private non-profit agencies purchase vehicles and other capital items to transport seniors and people with disabilities
- **New Freedom Program (Section 5317)**, which provided federal funds to expand transportation mobility options for people with disabilities.

These two programs were combined under MAP-21 to create the **Enhanced Mobility of Seniors and Individuals with Disabilities Program (Section 5310 Program)**.

Based on program requirements issued by the Federal Transit Administration (FTA), Section 5310 requires the designation of at least one recipient in the Milwaukee urbanized area for funding eligibility and a determination of the method for allocating the funds within the urbanized area. Representatives from the four counties – Milwaukee, Ozaukee, Washington, and Waukesha – and the five transit operators within the Milwaukee urbanized areas met several times to determine the preferred allocation method for the Section 5310 program. It was agreed that Milwaukee County would be the sole designated recipient for the Section 5310 funds in the Milwaukee urbanized area. As the designated recipient, Milwaukee County is responsible for administering grant agreements, applying for federal funds, and satisfying documentation and reporting requirements.

Recipients of the Milwaukee urbanized area's Section 5310 program funds are required to meet civil rights requirements under Title VI, as well as Equal Employment Opportunity (EEO) and Disadvantaged Business Enterprise (DBE) regulations.

Title VI

The elements of a Title VI Program are determined by FTA Circular 4702.1B (Appendix A) and include, but are not limited to:

- Title VI notice to the public, including a list of locations where the notice is posted
- Title VI complaint procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint) and Title VI complaint form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public participation plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program.

The Milwaukee County Transit System prepares a Title VI Program Update for submission to the FTA every three years.

Section 5310 Program subrecipients must submit their Title VI Programs to Milwaukee County, which will develop a schedule that outlines the frequency with which subrecipients must submit their Title VI programs. A subrecipient's Title VI program must be approved by the subrecipient's appropriate governing entity or official(s) responsible for policy decisions (e.g., board of directors, mayor, tribal executive, city administrator, etc.). Subrecipients must submit a copy of the board resolution, meeting minutes, or similar documentation as evidence of approval.

Contractors and subcontractors are not required to submit a Title VI report. However, they are responsible for complying with the Title VI Program of the recipient with whom they are contracting. Recipients and subrecipients are responsible for ensuring that their contractors are complying with their Title VI Program and Title VI regulations.

Milwaukee County is available to assist subrecipients with Title VI compliance. Milwaukee County will provide sample notifications, forms, and program language to subrecipients upon request.

Milwaukee County oversees subrecipient compliance with Title VI as follows:

- **Grant Agreements** – Through annual grant agreements, the subrecipient agrees to comply with applicable civil rights statutes and regulations, including Title VI of the Civil Rights Act, Equal Employment Opportunity (EEO), and Disadvantaged Business Enterprise (DBE). As subrecipients to Milwaukee County, Section 5310 Program subrecipients must comply with the FTA's Annual List of Certifications and Assurances signed annually by Milwaukee County.

- **Review of Subrecipient's Title VI Program** – Milwaukee County reviews the contents of Title VI Program materials as submitted by subrecipients, including public notification language, LEP, complaint procedures and complaint form, and public participation and outreach. Milwaukee County provides sample materials and technical assistance to subrecipients in developing a compliant Title VI Program.
- **Investigation and Monitoring of Title VI Complaints (or potential complaints and/or lawsuits)** – As part of its annual application, Milwaukee County requires subrecipients to report any Title VI complaints or lawsuits. Subrecipients may contact Milwaukee County at any time during the year to report Title VI complaints, potential complaints, and/or lawsuits. Milwaukee County may also receive complaints regarding subrecipients or their contractors directly from the public.
- **On-Site Visits** – Milwaukee County staff may conduct on-site visits as necessary to monitor subrecipient compliance. During on-site visits, staff will verify the location of the public notification language as stated in the subrecipient's Title VI Program. During this time, staff may also discuss with the subrecipient any new or potential opportunities for public participation and public outreach that may present themselves since the previous submission of the subrecipient's Title VI Program.

RECOMMENDATION

This report is for informational purposes only.

Prepared by: John Rodgers, Transportation Business Manager, MCDOT

**COUNTY OF MILWAUKEE
INTEROFFICE COMMUNICATION**

DATE: June 23, 2014

TO: Michael Mayo, Sr., Chairperson, Transportation, Public Works and Transit Committee

FROM: Brian Dranzik, Director, Department of Transportation

SUBJECT: Resolution Approving of Milwaukee County Transit System (MCTS) Title VI Policy Definitions for Major Service Change, Disparate Impact, and Disproportionate Burden

POLICY

Title VI of the Civil Rights Act of 1964 states: “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Title VI is codified under U.S. Department of Transportation Regulations (49 CFR part 21). The Federal Transit Administration (FTA) establishes requirements for transit systems with respect to Title VI under FTA Circular 4702.1B; Chapter IV, Section 3a (2)(e) of which establishes a requirement for board approval of Title VI policy definitions for major service change and disparate impact used by a transit system.

BACKGROUND

The FTA requires transit systems to analyze proposed service changes and fare changes to determine if there is potential for a disparate impact on minority populations or a disproportionate burden on low-income populations. Disparate impacts and disproportionate burdens are to be considered, and mitigated as possible. Prior to performing the required analysis, it is necessary to establish local policy definitions for “major service change,” “disparate impact” and “disproportionate burden.”

The FTA requires transit systems to use a public engagement process when establishing these local definitions. Furthermore, the FTA requires the Milwaukee County Transit System (MCTS)

to obtain County Executive and County Board approval of major service change and disparate impact policy definitions.

In October 2013, MCTS conducted two public outreach meetings to inform the public of proposed policy definitions and gather input about the policies. Meetings were held at the Center Street Library and at the Downtown Central Library. About 90 persons from the community attended these meetings. Based on the feedback received from the public, MCTS recommends the following policy definitions for approval by the County Executive and County Board.

MAJOR SERVICE CHANGE POLICY

A Major Service Change is defined as a change that:

- Affects 25 percent of the in-service bus hours on a route or group of routes,
- Affects 25 percent of the one way mileage of a route or group of routes,
- Affects 25 percent of the daily service period,
- Reduces the service span by more than an hour during the late night (930 pm to 6 am)
- Reduces the frequency of service (increases the headway) by 50 percent, and
- Creates a gap of greater than one-half mile from the nearest alternative service.

DISPARATE IMPACT POLICY / DISPROPORTIONATE BURDEN POLICY

MCTS uses the four-fifths rule, also known as the 80 percent rule, as the threshold for its disparate impact and disproportionate burden policies. Specifically, an impact has occurred when the ratio of the reduction in service to the minority or low-income population compared to the non-minority or non-low-income population exceeds four/fifths or 80 percent. The four-fifths rule is a commonly accepted measure used by many transit systems.

RECOMMENDATION

Approve the resolution defining the MCTS major service change policy and disparate impact policy.

Prepared by: Tom Winter, Director of Schedule and Planning, MCTS
Daniel Boehm, Interim Managing Director, MCTS

Approved by:

Brian Dranzik
Director, Department of Transportation

cc: Chris Abele, Milwaukee County Executive
Marina Dimitrijevic, Chairwoman, County Board of Supervisors
Kelly Bablitch, Chief of Staff, County Board of Supervisors
Raisa Koltun, Interim Chief of Staff, Milwaukee County Executive Office
John Zapfel, Deputy Chief of Staff, Milwaukee County Executive Office
Don Tyler, Director, Department of Administrative Services
Josh Fudge, Fiscal and Budget Administrator, Department of Administrative Services
Anthony Geiger, Fiscal and Budget Analyst, Department of Administrative Services

**COUNTY OF MILWAUKEE
INTEROFFICE COMMUNICATION**

DATE: June 23, 2014

TO: Michael Mayo, Sr., Chairperson, Transportation, Public Works and Transit Committee

FROM: Brian Dranzik, Director, Department of Transportation

SUBJECT: Federally Required Update to Title VI Program for the Milwaukee County Transit System (MCTS)

POLICY

MCTS periodically provides informational reports to the Committee on transit issues.

BACKGROUND

Title VI of the Civil Rights Act of 1964 states: “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Title VI is codified under U.S. Department of Transportation Regulations (49 CFR part 21).

The Federal Transit Administration’s (FTA) Title VI Circular 4702.1B requires transit providers prepare a Title VI Program Plan and update it every three years to document compliance with Title VI. The Milwaukee County Transit System’s (MCTS) current Title VI Program Plan was completed in 2011 and accepted by the FTA. MCTS is in the process of updating its Title VI Program Plan to meet a submittal deadline to the FTA of October 1, 2014.

The purpose of a Title VI Program Plan is to:

- Ensure that public transportation services are provided in a non-discriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

Title VI Program Plans submitted after 2012 are required to be approved for MCTS by the County Executive and County Board of Supervisors. Accordingly, MCTS will return in the September cycle to seek approval of the completed plan.

The MCTS Title VI Program Plan, which is currently under development, will include but not be limited to the following:

- Public notification that MCTS complies with Title VI, instructions on how to file a discrimination complaint, and a list of investigations, complaints, or lawsuits filed with MCTS.
- A public participation plan that includes an outreach plan to engage minority populations.
- A language assistance plan to engage limited English proficiency populations.
- Racial break-down of the members of non-elected committees: Transit Services Advisory Committee (TSAC); and Transit Plus Advisory Council (TPAC).
- A description of system-wide service standards and policies, and monitoring thereof.
- A demographic analysis of the transit service area including maps, charts and surveys.
- A description of the public engagement process used to set definitions for “major service change”, “disparate impact” and “disproportionate burden”
 - Adoption of a resolution approving of MCTS policy definitions for major service change, disparate impact, and disproportionate burden is also required by FTA.
- Analyses of major service changes and fare changes prior to County Executive and County Board approval of changes.
- Evidence of Board approval of major service change policy and disparate impact policy.

RECOMMENDATION

This report is informational only.

Prepared by: Tom Winter, Director of Schedule and Planning, MCTS
Dan Boehm, Interim Managing Director, MCTS

Approved by:

Brian Dranzik
Director, Department of Transportation

cc: Chris Abele, Milwaukee County Executive
Marina Dimitrijevic, Chairwoman, County Board of Supervisors
Kelly Bablitch, Chief of Staff, County Board of Supervisors
Raisa Koltun, Interim Chief of Staff, Milwaukee County Executive Office
John Zapfel, Deputy Chief of Staff, Milwaukee County Executive Office
Don Tyler, Director, Department of Administrative Services
Josh Fudge, Fiscal and Budget Administrator, Department of Administrative Services
Anthony Geiger, Fiscal and Budget Analyst, Department of Administrative Services

Chapter IV

PUBLIC TRANSIT SERVICE OBJECTIVES AND STANDARDS

INTRODUCTION

One of the critical steps in the preparation of a transit system development plan is the articulation of the objectives to be served by the transit system, together with the identification of supporting standards that can be used to measure the degree of attainment of the objectives. The objectives and standards provide the basis for assessing the performance of the existing transit system, identifying unmet transit service needs, designing and evaluating alternative transit system plans, and recommending service changes and improvements. The objectives and standards formulated under this study are intended to represent the level of transit performance desired by Milwaukee County.

This chapter presents the public transit service objectives, principles, and standards that were formulated and applied under the County's transit system development plan. The objectives and supporting standards set forth in this chapter may also be used by the County to guide in the design, operation, and review of its transit services after completion of this planning effort.

OBJECTIVES

The transit service objectives, principles, and standards set forth in this chapter are intended to reflect the underlying values of the elected officials and residents of Milwaukee County. One of the important functions of the Milwaukee County Public Transit Planning Advisory Committee was to articulate transit service objectives, principles, and supporting standards for the planning effort. By drawing upon the collective knowledge, experience, views, and values of the members of the Committee, it is believed that a meaningful expression of the performance desired for the Milwaukee County Transit System was obtained, and a relevant set of transit service objectives and supporting principles and standards was defined.

The specific objectives adopted envision a transit system that will effectively serve transit travel by Milwaukee County residents both within the County and between the County and other adjacent communities in the Milwaukee urbanized area. More specifically, the following objectives were adopted by the Advisory Committee:

1. The public transit system should effectively serve the existing land use pattern and support the implementation of planned land uses, meeting the demand and need for transit services, and particularly the needs of the transit-dependent population;

2. The transit system should promote effective utilization of transit service and operate service that is reliable and provides for user convenience and comfort;
3. The transit system should promote the safety and security of its passengers, operating equipment and facilities, and personnel;
4. The public transit system should promote efficiency in the total transportation system; and
5. The public transit system should be economical and efficient, meeting all other objectives at the lowest possible cost.

PRINCIPLES AND STANDARDS

Complementing each of the foregoing transit service objectives is a planning principle and two sets of service standards, as set forth in Table 32. The planning principle supports each objective by asserting its validity. Each set of standards is directly related to the transit service objective and serves several purposes. The service design and operating standards are intended to primarily provide guidelines for the design of new and improved services, the operation of the transit system, and the acquisition of capital equipment and construction of facilities. The service performance standards primarily facilitate the evaluation of the performance of the existing transit system and of alternative service improvements. For each performance standard, one or more criteria are identified which can be used to quantify the performance of the transit service for measurement against the standard.

The performance evaluation of the existing transit system undertaken for the current study included assessments of transit performance on both a systemwide basis and on an individual route basis. The performance standards set forth in Table 32 represent the specific standards and performance measures that were applied in conducting these evaluations. The performance standards in Table 32 include the transit system performance measures which the Wisconsin Department of Transportation utilizes to assess the performance of Wisconsin transit systems, and which the State requires be included in multi-year service and performance goals for each such transit system. Such measures include operating ratio, or farebox recovery rate; operating expense per passenger; passengers per capita; passengers per revenue vehicle hour of service; operating expenses per revenue vehicle hour of service; and revenue vehicle hours of service per capita. The performance standards and evaluation findings of this study can, therefore, provide guidance to the County in establishing the required multi-year service and performance goals.

OVERRIDING CONSIDERATIONS

The objectives, principles, and standards set forth in Table 32 were intended to be used to guide the evaluation of the performance of the existing transit system and the design and evaluation of alternative service improvements. In the application of the objectives, principles, and standards, several overriding considerations must be recognized.

First, it must be recognized that an overall evaluation of the existing public transit services and the alternative service plans must be made on the basis of cost and revenue. Such an analysis may show the attainment of one or more standards to be beyond the economic capability of the community and, therefore, the standards cannot be met practically and must be either modified or eliminated.

Second, it must be recognized that a transit system is unlikely to fully meet all the standards and that the extent to which each standard is met, exceeded, or violated must serve as the final measure of the ability of the system to achieve the objective that a given standard supports.

Third, it must be recognized that certain intangible factors, including the perceived value of the transit service to the County and its potential acceptance by the concerned elected officials, may influence the preparation and selection of a recommended plan. Inasmuch as transit service may be perceived as a valuable service, the County may decide to initiate or retain such services regardless of performance or cost. Only if a considerable degree of such acceptance exists will service recommendations be implemented and their anticipated benefits realized.

Table 32

PUBLIC TRANSIT SERVICE OBJECTIVES, PRINCIPLES, STANDARDS, AND PERFORMANCE MEASURES FOR BUS SERVICE PROVIDED BY THE MILWAUKEE COUNTY TRANSIT SYSTEM

Objective	Principle	Standards	Performance Measure												
<p>1. The public transit system should effectively serve the existing land use pattern and support the implementation of planned land uses, meeting the demand and need for transit services, and particularly the needs of the transit-dependent population</p>	<p>Public transit is an essential element of the transportation system, connecting major land use activities and providing the accessibility essential to the support of these activities. Transit services are most cost-efficient when serving areas that are fully developed to medium and high densities. Transit also provides an important means of access to jobs and services for all segments of the population, but particularly for persons who must depend on transit as their primary means of travel. Accessible mainline bus service can promote flexible and cost-effective transit service by reducing expenditures for paratransit services.</p>	<p><u>Service Design and Operating Standards</u></p>													
		<p>1. The public transit system should serve travel demand generated within contiguous areas of urban development in the urbanized area and should be designed to provide for a higher degree of accessibility to areas of high density (7.0-17.9 dwelling units per net residential acre), and medium density (2.2-6.9 dwelling units per net residential acre) urban development than to areas of low-density development or which should be protected from development</p>	<p>1. --</p>												
		<p>2. Public transit services should be designed and operated so as to permit the orderly and efficient expansion of service to developing areas</p>	<p>2. --</p>												
		<p>3. Public transit services should be provided that address the varied travel and mobility needs of the County population and offer access to the major activity centers in the urbanized area. The transit services provided should include:</p> <ul style="list-style-type: none"> a. Rapid and express service designed to reduce travel times for the longest trips made between component parts of the transit service area and to connect areas of high and medium density urban development to the Milwaukee central business district and the largest major activity centers b. Local service designed to provide transit within and between residential areas, to link residential areas with nearby major activity centers, and to provide for transfer connections with rapid, express, and other local services c. Local shuttle services designed to connect with rapid, express, and local services serving major activity centers d. Paratransit service designed to meet the needs of people with disabilities who are unable to use accessible mainline bus service 	<p>3. --</p>												
		<p>4. The public transit system should serve and connect major activity centers in the urbanized area that currently generate, or have the potential to generate, significant ridership including:</p> <ul style="list-style-type: none"> a. Housing facilities serving transit-dependent persons who are living independently including elderly persons, people with disabilities, and low-income individuals b. Principal hospitals and medical centers c. Major retail shopping malls d. Principal colleges and universities e. Major Federal, State, and local governmental offices and institutions f. Major employers with more than 500 employees at one site g. Major industrial and office parks h. Major passenger terminals for intercity bus, passenger rail, and airline carriers i. Major public and private recreational centers hosting high attendance events 	<p>4. --</p>												
		<p><u>Service Performance Standards</u></p>													
		<p>1. The population served should be maximized, particularly those who are transit-dependent. The population shall be considered as served when it resides within the following distances of transit service:</p>	<p>1. The number of people residing within appropriate walking or driving distance of a bus stop and the percent of the total population represented</p>												
		<p style="text-align: center;"><u>Maximum Distance from a Bus Stop</u></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;"><u>Service Type</u></th> <th style="text-align: center;"><u>Walking</u></th> <th style="text-align: center;"><u>Driving</u></th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td style="text-align: center;">1/2 Mile</td> <td style="text-align: center;">3 Miles</td> </tr> <tr> <td>Express</td> <td style="text-align: center;">1/2 Mile</td> <td style="text-align: center;">--</td> </tr> <tr> <td>Local</td> <td style="text-align: center;">1/4 Mile</td> <td style="text-align: center;">--</td> </tr> </tbody> </table>	<u>Service Type</u>	<u>Walking</u>	<u>Driving</u>	Rapid	1/2 Mile	3 Miles	Express	1/2 Mile	--	Local	1/4 Mile	--	
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<p>2. The major activity centers and jobs served should be maximized. Major activity centers and jobs shall be considered as served when located within the following distance of transit service:</p> <p style="text-align: center;">Maximum Walking</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;"><u>Service Type</u></th> <th style="text-align: center;"><u>Distance from a Bus Stop</u></th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td style="text-align: center;">1/2 Mile</td> </tr> <tr> <td>Express</td> <td style="text-align: center;">1/2 Mile</td> </tr> <tr> <td>Local</td> <td style="text-align: center;">1/4 Mile</td> </tr> </tbody> </table>	<u>Service Type</u>	<u>Distance from a Bus Stop</u>	Rapid	1/2 Mile	Express	1/2 Mile	Local	1/4 Mile	<p>2. The number of major activity centers and jobs located within appropriate walking distance of a bus stop and the percent of the total activity centers and jobs represented</p>						
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<p>3. The transit supportive land area served should be maximized. To be considered transit supportive, an area should have a density of at least 4 dwelling units per net residential acre, or at least 4 jobs per gross acre</p>	<p>3. The proportion of the transit supportive land area located within one-quarter mile of a local bus route</p>														

Table 32 (continued)

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1. (continued)	(continued)	<p>4. The public transit system should provide service within the urbanized area that maximizes the population that is:</p> <ul style="list-style-type: none"> a. Within 45 minutes overall transit travel time of 40 percent of the jobs in the urbanized area b. Within 35 minutes overall transit travel time of a major shopping mall c. Within 40 minutes overall transit travel time of a major college or university d. Within 30 minutes overall transit travel time of a major hospital or medical center e. Within 40 minutes overall transit travel time of a major Federal, State, or local governmental office or public institutional center f. Within 60 minutes overall transit travel time of a major passenger terminal for an intercity bus, passenger rail, or airline carrier g. Within 60 minutes overall transit travel time of a major public or private recreational center hosting high attendance events 	4. The number of people residing within each of the prescribed travel times and the percent of the total population represented																										
2. The transit system should promote effective utilization of transit service and operate service that is reliable and provides for user convenience and comfort.	The benefits of a public transit system are, to a large extent, greatly related to the degree to which it is used as measured by transit ridership. Ridership is a function of the degree to which people have access to transit services which are reliable and provide for quick, convenient, and comfortable travel. Riders view transit services with these attributes as an effective and attractive alternative to the private automobile.	<p><u>Service Design and Operating Standards</u></p> <ol style="list-style-type: none"> 1. Public transit routes should have direct alignments with a limited number of turns, and should be arranged to minimize duplication of service and unnecessary transfers which would otherwise discourage transit use. 2. Rapid and express transit routes should be extended as needed to perform a collection-distribution function at the ends of the route 3. Public transit service that does not meet service performance standards may be warranted in special instances if it improves total system continuity and/or provides significant feeder service or transfer opportunities to other routes 4. Bus stops should be clearly marked by easily recognized bus stop signs and located so as to minimize the walking distance to and from residential areas and major activity centers over an accessible path for all users including people with disabilities, and to facilitate connections with other transit services where appropriate. The suggested locations and spacing for stops are as follows: <table border="1" data-bbox="673 903 1242 1060"> <thead> <tr> <th><u>Service Type</u></th> <th><u>Stop Locations and Spacing</u></th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td>At terminal areas and one-mile or more on line-haul sections</td> </tr> <tr> <td>Express</td> <td>At terminal areas, intersecting transit routes, signalized intersections with arterial streets, and major activity centers</td> </tr> <tr> <td>Local</td> <td>600 to 1,200 feet (two to three blocks) apart</td> </tr> </tbody> </table> <p>5. The public transit system should be designed and operated so as to achieve the following minimum overall travel speeds by area based on average weekday conditions:</p> <table border="1" data-bbox="673 1123 1242 1249"> <thead> <tr> <th rowspan="2"><u>Service Type</u></th> <th colspan="3"><u>Travel Speed (miles per hour)</u></th> </tr> <tr> <th><u>CBD</u></th> <th><u>Central City</u></th> <th><u>Outlying Areas</u></th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td>5-10</td> <td>15-30</td> <td>40-55</td> </tr> <tr> <td>Express</td> <td>5-10</td> <td>15-20</td> <td>25-35</td> </tr> <tr> <td>Local</td> <td>5-10</td> <td>12-15</td> <td>18-25</td> </tr> </tbody> </table>	<u>Service Type</u>	<u>Stop Locations and Spacing</u>	Rapid	At terminal areas and one-mile or more on line-haul sections	Express	At terminal areas, intersecting transit routes, signalized intersections with arterial streets, and major activity centers	Local	600 to 1,200 feet (two to three blocks) apart	<u>Service Type</u>	<u>Travel Speed (miles per hour)</u>			<u>CBD</u>	<u>Central City</u>	<u>Outlying Areas</u>	Rapid	5-10	15-30	40-55	Express	5-10	15-20	25-35	Local	5-10	12-15	18-25
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6. The hours of service operation for the public transit system should serve the demand generated by the land use activities served by, and the function of, each route. Service periods should also accommodate the travel needs of those who depend on the transit system as their primary travel mode. The transit system should, therefore, strive to operate routes with service hours as follows: <table border="1" data-bbox="673 1354 1242 1480"> <thead> <tr> <th rowspan="2"><u>Service Type</u></th> <th colspan="3"><u>Desirable Service Hours</u></th> </tr> <tr> <th><u>Weekdays</u></th> <th><u>Saturdays</u></th> <th><u>Sundays/Holidays</u></th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td>6:00 a.m.-10:00 p.m.</td> <td>6:00 a.m.-10:00 p.m.</td> <td>6:00 a.m.-10:00 p.m.</td> </tr> <tr> <td>Express</td> <td>5:00 a.m.-11:00 p.m.</td> <td>5:00 a.m.-11:00 p.m.</td> <td>5:00 a.m.-11:00 p.m.</td> </tr> <tr> <td>Local</td> <td>5:00 a.m. - 1:00 a.m.</td> <td>5:00 a.m. - 1:00 a.m.</td> <td>5:00 a.m. - 1:00 a.m.</td> </tr> </tbody> </table>	<u>Service Type</u>	<u>Desirable Service Hours</u>			<u>Weekdays</u>	<u>Saturdays</u>	<u>Sundays/Holidays</u>	Rapid	6:00 a.m.-10:00 p.m.	6:00 a.m.-10:00 p.m.	6:00 a.m.-10:00 p.m.	Express	5:00 a.m.-11:00 p.m.	5:00 a.m.-11:00 p.m.	5:00 a.m.-11:00 p.m.	Local	5:00 a.m. - 1:00 a.m.	5:00 a.m. - 1:00 a.m.	5:00 a.m. - 1:00 a.m.	7. The availability of weekend and holiday service enhances the attractiveness of weekday service and positively affects system ridership by providing that regular weekday riders need not seek alternative travel modes. Therefore, a reasonable level of service should also be maintained on weekends and holidays.									
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8. Operating headways for public transit fixed-route service should be capable of accommodating passenger demand at the recommended load standards, and should also provide for a convenient service so as to encourage transit use. The desirable headways presented below represent a frequency of transit service that would be desirable to provide a service of high quality and to promote transit ridership. Lower headways may be provided in the core service area ⁹ for the system and high density corridors of heavy travel demand, while only higher headways may be feasible in areas of low and medium density. <table border="1" data-bbox="673 1743 1242 1879"> <thead> <tr> <th rowspan="3"><u>Service Type</u></th> <th colspan="3"><u>Desirable Headway (minutes)</u></th> </tr> <tr> <th colspan="2"><u>Weekday</u></th> <th><u>Weekend</u></th> </tr> <tr> <th><u>Peak Period</u></th> <th><u>Off-Peak Period</u></th> <th><u>Periods/Holidays</u></th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td>10</td> <td>20</td> <td>30</td> </tr> <tr> <td>Express</td> <td>10</td> <td>20</td> <td>30</td> </tr> <tr> <td>Local</td> <td>10</td> <td>20</td> <td>30</td> </tr> </tbody> </table>	<u>Service Type</u>	<u>Desirable Headway (minutes)</u>			<u>Weekday</u>		<u>Weekend</u>	<u>Peak Period</u>	<u>Off-Peak Period</u>	<u>Periods/Holidays</u>	Rapid	10	20	30	Express	10	20	30	Local	10	20	30	8.						
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2. (continued)	(continued)	<p>8. (continued) Operating headways should not exceed the following maximum headways throughout the service area when service is offered: <u>Maximum Headway (minutes)</u></p> <table border="1" data-bbox="673 304 1031 430"> <thead> <tr> <th rowspan="2">Service Type</th> <th colspan="2">Weekday</th> <th>Weekend</th> </tr> <tr> <th>Peak</th> <th>Off-Peak</th> <th>Periods/ Holidays</th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td>30</td> <td>60</td> <td>60</td> </tr> <tr> <td>Express</td> <td>30</td> <td>60</td> <td>60</td> </tr> <tr> <td>Local</td> <td>30</td> <td>60</td> <td>60</td> </tr> </tbody> </table> <hr/> <p>9. All transit vehicles should be equipped with padded seats, heating/air conditioning units, and wheelchair lifts/ramps that are in good working condition. Window treatments should maintain outward visibility for passengers. Vehicle interiors and exteriors should be cleaned and inspected daily with needed equipment repairs made on a timely basis</p> <hr/> <p>10. Consideration should be given to rehabilitating or replacing each public transit vehicle at the end of its normal service life, which shall be defined as follows:</p> <table border="1" data-bbox="673 598 1120 724"> <thead> <tr> <th rowspan="2">Vehicle Type</th> <th rowspan="2">Length (feet)</th> <th colspan="2">Normal Service Life</th> </tr> <tr> <th>Years</th> <th>Mileage</th> </tr> </thead> <tbody> <tr> <td>Heavy-duty bus</td> <td>35 or more</td> <td>12</td> <td>500,000</td> </tr> <tr> <td>Heavy-duty bus</td> <td>25-30</td> <td>10</td> <td>350,000</td> </tr> <tr> <td>Medium-duty bus</td> <td>25-30</td> <td>7</td> <td>200,000</td> </tr> <tr> <td>Light-duty bus</td> <td>25-30</td> <td>5</td> <td>150,000</td> </tr> </tbody> </table> <hr/> <p>11. Consideration should be given to providing passenger shelters of an attractive design at all bus stops where warranted by existing conditions including: boarding passenger counts, passenger waiting time, bus stop situation, exposure to weather conditions, and the facility or land use being served.^b Access to shelters for people with disabilities should be maintained.</p> <hr/> <p>12. Park-ride facilities should be provided at appropriate stops on rapid and express services to serve transit users from medium and low density residential areas. Sufficient off-street automobile parking should be provided at park-ride facilities to accommodate the total parking demand generated by transit users and carpoolers</p> <hr/> <p>13. Provisions for transporting bicycles on transit vehicles should be considered</p> <hr/> <p><u>Service Performance Standards</u></p> <p>1. Ridership on the transit system and the overall effectiveness of the services provided should be maximized.</p> <p>2. Ridership and service levels on each transit route should be monitored and service levels adjusted to be appropriate for demand levels unless special circumstances warrant otherwise.^c</p> <p>3. The minimum service effectiveness levels to warrant continued service operation shall be as specified below, unless special circumstances warrant otherwise^c:</p> <table border="1" data-bbox="673 1375 1128 1480"> <thead> <tr> <th>Service Period</th> <th>Total Boarding Passengers Per Revenue Vehicle Hour</th> </tr> </thead> <tbody> <tr> <td>Weekdays</td> <td>22^e</td> </tr> <tr> <td>Saturdays</td> <td>15^e</td> </tr> <tr> <td>Sundays/Holidays</td> <td>10^e</td> </tr> </tbody> </table> <hr/> <p>4. The average maximum load factor, measured as the ratio of passengers to bus seats at that point on a route where passenger loads are highest, should not exceed the following during any one-hour period:</p> <table border="1" data-bbox="673 1522 1153 1627"> <thead> <tr> <th rowspan="2">Service Type</th> <th colspan="2">Average Maximum Load Factor</th> </tr> <tr> <th>Peak Periods</th> <th>All Other Times</th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td>1.00</td> <td>1.00</td> </tr> <tr> <td>Express</td> <td>1.33</td> <td>1.00</td> </tr> <tr> <td>Local</td> <td>1.33</td> <td>1.00</td> </tr> </tbody> </table> <hr/> <p>5. The transit system should be designed and operated to maximize schedule adherence and be "on-time" at least 90 percent of the time. On-time is defined as schedule adherence within the ranges of one minute early and three minutes late.</p> <hr/> <p>6. Travel for public transit passengers should be reasonable in comparison to travel by private automobile for trips made between component parts of the service area. Transit travel distances and times should not be more than 1.5 times longer than with the automobile travel for comparable trips</p>	Service Type	Weekday		Weekend	Peak	Off-Peak	Periods/ Holidays	Rapid	30	60	60	Express	30	60	60	Local	30	60	60	Vehicle Type	Length (feet)	Normal Service Life		Years	Mileage	Heavy-duty bus	35 or more	12	500,000	Heavy-duty bus	25-30	10	350,000	Medium-duty bus	25-30	7	200,000	Light-duty bus	25-30	5	150,000	Service Period	Total Boarding Passengers Per Revenue Vehicle Hour	Weekdays	22 ^e	Saturdays	15 ^e	Sundays/Holidays	10 ^e	Service Type	Average Maximum Load Factor		Peak Periods	All Other Times	Rapid	1.00	1.00	Express	1.33	1.00	Local	1.33	1.00	<p>9. --</p> <hr/> <p>10. --</p> <hr/> <p>11. --</p> <hr/> <p>12. --</p> <hr/> <p>13. --</p> <hr/> <p>1a. Total passengers 1b. Total passengers per capita 1c. Revenue vehicle hours per capita 1d. Total passengers per revenue vehicle hour 1e. Total passengers per revenue vehicle mile</p> <hr/> <p>2a. Total boarding passengers per revenue vehicle mile 2b. Total boarding passengers per revenue vehicle hour 2c. Productivity frequency index^d</p> <hr/> <p>3. Total boarding passengers per revenue vehicle hour</p> <hr/> <p>4. Average maximum load factor by route for the weekday peak hour of service</p> <hr/> <p>5. Percent of scheduled bus trips on time</p> <hr/> <p>6a. Ratio of transit to highway distance 6b. Ratio of transit to highway travel time</p>
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2. (continued)	(continued)	7. Preventative maintenance policies and practices should be established to maximize the reliability of revenue vehicles so that: a. All of the vehicles required to operate peak service are available daily b. The number of breakdowns requiring a maintenance road call do not exceed one per 6,000 vehicle miles of service	7a. Number of buses available for weekday peak service versus peak bus requirement 7b. Percent of buses that miss scheduled pull-outs 7b. Vehicle miles between road calls
3. The transit system should promote the safety and security of its passengers, operating equipment and facilities, and personnel and project a positive image to the general public.	Accidents take a heavy toll in property damage and human suffering, and can contribute substantially to the overall costs of operation for the public transit system and, in particular, the public funds required. Incidences that jeopardize the security of passengers or transit system property may promote the perception that transit travel is not safe, thereby hampering the mobility of persons who must travel within areas the public deems unsafe. Therefore, every attempt should be made in the operation of the transit system to reduce the incidence and severity of accidents and to increase security for transit passengers, equipment and facilities, and personnel	<u>Service Design and Operating Standards</u> 1. Public transit service should not be operated over streets that exhibit conditions that may be hazardous for transit operations including steep grades, narrow traffic lanes, uncontrolled intersections, poor pavement conditions, or habitual problems with illegal parking	1. --
		2. Nearside bus stops facilitate passenger use of crosswalks and convenience in transferring between routes, provide for adequate sight considerations for vehicle operators, and allow transit vehicles to utilize the intersection to merge into traffic. The use of nearside locations for bus stops on a consistent basis is also favored by people with disabilities. Therefore, bus stops should generally be located at the nearside of intersections to promote passenger safety and the safe operation of transit vehicles. Stops may be located elsewhere if warranted by special circumstances	2. --
		3. Bus stops should not be located in areas without adequate pedestrian facilities such as sidewalks or adequately maintained roadway shoulders that provide for a safe and accessible travel path for all users including people with disabilities.	3. --
		4. The public transit system should promote the use of appropriate security equipment and practices--such as mobile radios, automatic vehicle location (AVL) hardware, cameras, passenger information kiosks with security call boxes, and security personnel--to enhance the security of passengers and transit system equipment, facilities, and personnel	4. --
		<u>Service Performance Standards</u> 1. The number of accidents on the public transit system should be minimized	1. The number of accidents on the transit system per 100,000 vehicle miles of service
		2. The number of security incidences on transit property should be minimized	2. The number of security incidences on the transit system per 100,000 vehicle miles of service
4. The public transit system should promote efficiency in the total transportation system	Public transit facilities and services can promote economy and efficiency in the total transportation system. The transit system has the potential to supply additional passenger transportation capacity, which can alleviate peak loadings on arterial street facilities and assist in reducing the demand for land necessary for parking facilities at major activity centers. Efficient transit service also has the potential to reduce energy consumption and air pollutant emissions	<u>Service Performance Standards</u> 1. The total amount of energy and the total amount of energy per passenger mile consumed in operating the total transportation system of which the public transit system is an integral part, particularly petroleum-based fuels, should be minimized 2. The amount of highway system capacity which must be provided to serve travel demand should be minimized	1. Passenger miles per gallon of motor fuel 2. Potential increase in vehicle traffic on surface streets if transit trips use automobile
5. The public transit system should be economical and efficient, meeting all other objectives at the lowest possible cost	The total financial resources of the County are limited and any investment of funds in public transit facilities and services must be weighed against other public investments. Therefore, total transit system costs should be minimized for the desired level of transit service and transit revenues should be maximized to maintain the financial stability of the services. The attainment of this objective may at times conflict with, and require the modification or elimination of, other standards	<u>Service Design and Operating Standards</u>	
		1. The total operating and capital investment for the public transit system should be minimized and reflect efficient utilization of resources	1. --
		2. The fare policy for the public transit system should provide for premium fares for premium transit services, as well as special or discounted fares for priority population groups and frequent transit riders	2. --
		3. Periodic increases in passenger fares should be considered to maintain the financial stability of the public transit system when: a. The farebox recovery rate for the transit system goes below levels determined to be acceptable by local officials b. Operating expenses for the transit system have increased by 10 to 15 percent since fares were last raised c. Projected levels of Federal and State operating assistance funds would require an increase in projected local operating assistance levels above that determined to be acceptable by local officials	3. --
4. Public transit service should not be extended to communities or major activity centers located outside the County at the direct expense of County taxpayers. The net local costs—total costs minus passenger revenues and Federal and/or state assistance funds—of such transit service shall be provided through sources other than County tax dollars unless special circumstances warrant otherwise	4. --		

Table 32 (continued)

Objective	Principle	Standards	Performance Measure
5. (continued)	(continued)	<p><u>Service Performance Standards</u></p> <p>1. The operating expense per unit of transit service, the operating expense per passenger, and the total operating assistance per passenger should be minimized for the public transit system as a whole. Annual increases in such costs should not exceed the average percentage increase experienced by comparable transit systems</p> <hr/> <p>2. Public transit system operating revenues generated from passenger fares and private sources should be maximized.</p> <hr/> <p>3. The total operating expense per passenger and total operating assistance per passenger should be minimized for the public transit system as a whole. Annual increases in such costs should not exceed the average percentage increase experienced by comparable transit systems</p> <hr/> <p>4. Cost effectiveness levels on each transit route should be monitored and service levels adjusted to be appropriate for demand levels or the route eliminated unless special circumstances warrant otherwise^c. Cost effectiveness levels shall be measured using the total boarding passengers per revenue vehicle hour for each route.</p>	<p>1a. Operating expense per revenue and total vehicle mile</p> <p>1b. Operating expense per revenue and total vehicle hour</p> <p>1c. Operating expense per boarding passenger</p> <p>1d. Total operating assistance per boarding passenger</p> <hr/> <p>2. Percent of operating expenses recovered through passenger and other operating revenues, excluding public operating assistance</p> <hr/> <p>3a. Total operating expense per boarding passenger</p> <p>3b. Total operating assistance per boarding passenger</p> <hr/> <p>4a. Total boarding passengers per revenue vehicle hour</p>

^aThe "core service area" for the transit system is the area bounded by Capitol Drive on the north, Oklahoma Avenue on the south, 76th Street on the west, and Lake Michigan on the east.

^bPotential bus shelter locations shall be reviewed and scored against criteria which are deemed to warrant the construction of a shelter, with a range of point values assigned to conditions for the criteria that rate the relative need for a shelter. The total point value for each location shall determine its rank in a prioritized listing of potential sites with a maximum possible total score of 100 points for each location. The criteria and conditions used to rank bus shelter locations are as follows:

Conditions Warranting Bus Shelter	Point Value	Conditions Warranting Bus Shelter	Point Value
<u>Boarding Passenger Counts</u>		<u>Facility or Land Use Being Served</u>	
Less than 25 passengers.....	0	(values are additive up to a maximum of 10 points)	
25-74 passengers.....	10	Not a transit trip generator.....	0
75-149 passengers.....	20	Commercial or shopping center.....	5
150-299 passengers.....	30	Industrial plant or office building.....	5
300 or more passengers.....	40	Park or recreation center.....	5
<u>Passenger Waiting Time</u>		Other significant transit trip generator.....	5
(one-half of the midday headway)		High density residential area.....	10
Less than 3.0 minutes.....	0	Facility or activity for elderly individuals.....	10
3.1-6.0 minutes.....	4	Facility or activity for people with disabilities.....	10
6.1-9.0 minutes.....	8	Hospital, medical center, or clinic.....	10
9.1-12.0 minutes.....	12	University, college, or public secondary school.....	10
12.1-15.0 minutes.....	16		
More than 15.0 minutes.....	20		
<u>Bus Stop Situation</u>			
Not a transfer point.....	0		
Transfer point.....	10		
<u>Exposure to Weather Conditions</u>			
None.....	0		
Minimum.....	5		
Average.....	10		
Full.....	20		

^cA reasonable period of time should be allowed for ridership to develop and stabilize before evaluating the performance of new transit services to determine if the service should be continued, modified, or eliminated. Generally, new transit services should achieve 40 percent of average performance levels for existing routes after six months of operation; 60 percent of average performance levels for existing routes after nine months of operation; and 80 percent of average performance levels for existing routes after one year of operation. The period for services that are funded through Federal or state transit demonstration grants may be extended to coincide with the period for the demonstration grant.

^dThe productivity frequency index (PFI) is an analytical tool developed by the Milwaukee County Transit System which measures the relationship between passengers per revenue vehicle hour of service and the service frequency, or headway on each bus route. The index is calculated for each route in the transit system by service period as follows:

$$PFI = \text{Boarding Passengers per Revenue Vehicle Hour} \times \frac{\text{Average Headway on Route}}{60 \text{ Minutes}}$$

The PFI values calculated for each route are compared against target values for the transit system to assist in determining if changes in the headways on the route should be considered.

^eDuring 2004, the transit system carried about 41 total passengers per revenue vehicle hour systemwide on all services and the regular routes operated on an average weekday carried about 35 total passengers per revenue vehicle hour.

Source: SEWRPC.

**Milwaukee County Transit System
Interoffice Memorandum**

DATE: June 23, 2012

TO: File

FROM: Mark McComb

SUBJECT: 2011 Title VI Assessment of Compliance - Requirement to Monitor Transit Service

Planning staff have annually compared the level and quality of transit service in minority and non-minority areas to ensure that the application of MCTS standards and policies results in an equitable distribution per Title VI guidelines. MCTS followed the service monitoring procedures described in the “Level of Service Methodology” section in Title VI regulations (FTA C 4702.1A, Page V-7). The ridership and service hours data used in this analysis were taken from the September 2011 schedule period.

For the purposes of assessing compliance with Title VI, a census tract was identified as minority if the concentration of minority residents in that tract exceeded the county-wide average for minority residents. According to U.S. Census statistics from 2010, 45.7% of the population of Milwaukee County is made up of ethnic minorities who are not white and not Hispanic. Similarly, census tracts with a percentage of minority residents less than the county-wide average were identified as a non-minority tract. Given these definitions, each MCTS bus route was identified as primarily serving:

- Minority areas
 - If > 75% of the census tracts that the route served were minority tracts
- Minority and Non-Minority areas
 - If 25% - 75% of the census tracts that the route served were minority tracts
- Non-Minority areas.
 - If < 25% of the census tracts that the route served were minority tracts

Service Standards

Vehicle Load - Average maximum loads were calculated during the a.m. and p.m. peak periods for each regular route (see table – 2011 Weekday Average Maximum Load Factors). All regular routes are well below the 1.3 standard. The highest maximum loads were on routes that traveled through areas that served minority populations, however these load factors well still well below the standard.

Vehicle Headways – All routes are provided with sufficient service to meet demand. The headways of routes that serve minority and minority and non-minority areas are better than

the headways on routes that serve non-minority areas (see table – 2011 Weekday, Saturday, or Sunday Average Headways for Regular Routes).

On Time Performance - All operators are required to meet an on-time performance standard of being between one minute early and three minutes late at a time point. MCTS regularly monitors on-time performance throughout the system. MCTS has set a system wide on-time standard of 90%. Data from 2011 shows that weekday service met this standard, while weekend service fell slightly short with an average on-time performance in the upper 80% range (see table – 2011 MCTS System On-Time Performance). 2011 on-time performance has improved over 2010; however, MCTS will continue to work towards improving weekend on-time performance to meet the standard by 2013.

Distribution of Transit Amenities – The supply and demand for transit service is measured according to the number of passenger per bus hour (PBH) on a route. The application of this measure to the system produces an equitable distribution of bus hours (see table – 2011 Weekday Bus Hours and PBH).

The distribution of bus shelters is based on a scoring system that rates several factors, e.g., daily ridership at the bus stop, if the stop is at a transfer corner, and the level of exposure to the weather at the stop. Most of the highest utilized bus stops, and thus shelters, are in areas that have a high minority population.

Route guides and timetables are extensively distributed throughout the community. An entire set of all routes guides can be found at libraries, government offices, and employment centers. Timetables for the specific route are also available on-board the vehicle, with changes to the timetable being made available prior to implementation. Passengers can have printed timetables mailed to them, and may also access schedule information via a mobile phone or the internet. Passengers are able to purchase tickets and passes at several grocery stores, gas stations, and banks/credit unions.

Service Availability – The span of service, e.g., from 5:00 a.m. until 1:00 a.m., is equitably distributed among both minority and non-minority areas (2011 – Average Hours of the Day Served on Weekdays).

Service Policies

Vehicle Assignment – MCTS’s fleet is fairly standardized with regard to amenities. All 40 foot vehicles are standard New Flyer coaches with two doors, standard seats, and auxiliary heating and air conditioning (see table - Bus Distribution and Count). MCTS no longer operates 30-foot vehicles; therefore, all routes are served with standard 40-foot buses. All vehicles are available for use on any route, and are assigned in no particular order.

Transit Security – In addition to the oversight provided by the Manager of Security and Street Operations, the primary security-related support to on bus incidents is provided by a private security firm contracted by MTS. G4S Secure Solutions Inc. employs over 20 Custom Protection Officers (CPOs) and provides over 848 hours of weekly service, of which

about 70 weekday hours are spent riding buses. Contract Security managers and the Manager of Security and Street Operations work together to assign priority for bus riding to the routes and times of day where the data suggest a higher likelihood for security incidents to occur. They work to provide appropriate coverage for vehicle response and assign special teams to operators who report specific incidents. Data collected from operator calls through the CAD/AVL are mapped and graphed to aid the security team in the development of sound security deployment strategies.

Beyond the coordination with security and law enforcement, several additional measures are taken to ensure a safe environment for both employees and passengers. The Manager of Security and Street Operations meets monthly with representatives from the operator's union and management to address and discuss security issues. To deter and detect criminal activity, there are four security cameras (both video and audio) installed on every bus, and MCTS has partnered with the Milwaukee Police Department to secure a grant to install over 20 cameras and major transfer corners throughout the city. These cameras are owned and operated by MPD, but purchase through a Transit Security Grant.

The Manager of Security and Street Operations trains all new operators in safe passenger interaction techniques and conflict communication skills. New operators also receive training on suspicious activity recognition through nationally recognized "Transit Watch" program. This program is aimed to raise passenger and employee awareness of suspicious persons, activity and potential threats to our transportation infrastructure. Campaign materials were funded through a Homeland Security grant and are available in both English and Spanish as well as on the website.

2011 Title VI Route Evaluation

Weekday Average Maximum Load Factors For Regular Routes During AM and PM Peak Periods

Rt	Name	Category	Load Factor	Load Factor
			AM	PM
Minority				
12	12th - Wisconsin	Minority	0.72	0.79
23	Fond du Lac Avenue	Minority	0.67	0.74
27	27th Street	Minority	0.72	0.87
33	Vliet Street	Minority	0.38	0.28
35	35th Street	Minority	0.56	0.59
63	Silver Spring Drive	Minority	0.49	0.54
80	6th Street	Minority	0.72	0.59
Group Average			0.61	0.63
Non-Minority				
15	Oakland - Kinnickinnic	Non-Minority	0.74	0.85
28	108th Street	Non-Minority	0.26	0.31
55	Layton Avenue	Non-Minority	0.31	0.49
64	S. 60th	Non-Minority	0.21	0.15
68	Port Washington	Non-Minority	0.18	0.21
Group Average			0.34	0.40
Minority and Non-Minority				
10	Humboldt - Wisconsin	Minority and Non-Minority	0.79	0.69
11	Holton-Greenfield/Howell	Minority and Non-Minority	0.41	0.41
14	Forest Home	Minority and Non-Minority	0.56	0.82
18	National Avenue	Minority and Non-Minority	0.59	0.62
19	King - S. 13th/S. 20th	Minority and Non-Minority	0.64	0.72
21	North Avenue	Minority and Non-Minority	0.46	0.54
22	Center Street	Minority and Non-Minority	0.49	0.54
30	Sherman - Wisconsin	Minority and Non-Minority	0.74	0.74
31	State - Highland	Minority and Non-Minority	0.38	0.51
51	Oklahoma Avenue	Minority and Non-Minority	0.49	0.44
53	Lincoln Avenue	Minority and Non-Minority	0.51	0.31
54	Mitchell - Burnham	Minority and Non-Minority	0.41	0.41
57	Walnut - Lisbon	Minority and Non-Minority	0.49	0.38
60	Burleigh Street	Minority and Non-Minority	0.46	0.67
62	Capitol Drive	Minority and Non-Minority	0.62	0.82
67	N. 76th - S. 84th	Minority and Non-Minority	0.62	0.67
76	N. 60th - S. 70th	Minority and Non-Minority	0.59	0.72
Group Average			0.54	0.59

Maximum loads are based on the average of the maximum number of people aboard each trip from 6a-9a or 3p-6p in the peak direction from APC route trip list report data for Fall of 2011.

Load Factor is calculated by taking the average of the peak period, peak direction maximum trip loads divided by the number of seats on a standard 40 foot bus (39 seats)

2011 Title VI Route Evaluation

Weekday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM HW</u>	<u>MD HW</u>	<u>PM HW</u>	<u>EVE HW</u>	<u>LN HW</u>
Minority						
12	12th - Wisconsin	10	13	11	18	20
23	Fond du Lac Avenue	10	16	10	20	22
27	27th Street	10	12	10	16	23
33	Vliet Street	35	33	37	25	25
35	35th Street	18	17	19	25	29
63	Silver Spring Drive	19	25	20	31	60
80	6th Street	11	18	12	20	20
	Group Average	16	19	17	22	28
Non-Minority						
15	Oakland - Kinnickinnic	13	17	14	22	30
28	108th Street	32	32	30	44	
55	Layton Avenue	28	29	30	40	40
64	S. 60th	42	43	45		
68	Port Washington	28	28	28	49	49
	Group Average	29	30	29	39	40
Minority and Non-Minority						
10	Humboldt - Wisconsin	18	21	14	18	30
11	Holton-Greenfield/Howell	17	15	16	20	30
14	Forest Home	20	20	21	27	33
18	National Avenue	14	14	14	18	21
19	King - S. 13th/S. 20th	10	16	18	15	25
21	North Avenue	14	17	11	18	27
22	Center Street	11	14	13	21	31
30	Sherman - Wisconsin	7	10	8	18	19
31	State - Highland	20	23	22	27	28
51	Oklahoma Avenue	18	18	16	28	27
53	Lincoln Avenue	20	26	16	23	32
54	Mitchell - Burnham	20	18	16	35	32
57	Walnut - Lisbon	18	19	16	45	40
60	Burleigh Street	13	17	13	21	36
62	Capitol Drive	10	14	12	17	21
67	N. 76th - S. 84th	16	22	18	32	52
76	N. 60th - S. 70th	21	22	23	26	30
	Group Average	16	18	16	24	30

Data is for Fall of 2011 service from 2011 MCTS Annual Ridership Statistics Book

2011 Title VI Route Evaluation

Saturday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM HW</u>	<u>MD HW</u>	<u>PM HW</u>	<u>EVE HW</u>	<u>LN HW</u>
Minority						
12	12th - Wisconsin	27	20	18	21	28
23	Fond du Lac Avenue	20	14	14	16	20
27	27th Street	17	13	13	14	28
33	Vliet Street	28	30	30	30	27
35	35th Street	32	24	22	26	30
63	Silver Spring Drive	29	25	26	21	59
80	6th Street	24	21	21	26	31
	Group Average	25	21	21	22	32
Non-Minority						
15	Oakland - Kinnickinnic	19	19	19	22	24
28	108th Street	48	48	49		
55	Layton Avenue	34	27	26	35	37
64	S. 60th	120	56	56		
68	Port Washington	48	57	57	50	50
	Group Average	54	41	41	36	37
Minority and Non-Minority						
10	Humboldt - Wisconsin	35	29	29	27	30
11	Holton-Greenfield/Howell	32	26	25	25	30
14	Forest Home	35	29	29	35	32
18	National Avenue	19	16	16	20	22
19	King - S. 13th/S. 20th	18	17	17	17	23
21	North Avenue	17	18	19	23	30
22	Center Street	20	18	17	20	27
30	Sherman - Wisconsin	13	11	11	17	19
31	State - Highland	35	28	28	52	52
51	Oklahoma Avenue	29	29	28	38	36
53	Lincoln Avenue	37	38	38	38	38
54	Mitchell - Burnham	66	37	25	32	31
57	Walnut - Lisbon	45	31	31	31	50
60	Burleigh Street	20	17	15	20	35
62	Capitol Drive	20	15	15	20	30
67	N. 76th - S. 84th	59	33	32	34	58
76	N. 60th - S. 70th	25	18	19	25	29
	Group Average	31	24	23	28	34

Data is for Fall of 2011 service from 2011 MCTS Annual Ridership Statistics Book

2011 Title VI Route Evaluation

Sunday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM HW</u>	<u>MD HW</u>	<u>PM HW</u>	<u>EVE HW</u>	<u>LN HW</u>
Minority						
12	12th - Wisconsin	23	16	17	29	28
23	Fond du Lac Avenue	28	18	18	21	40
27	27th Street	22	15	15	16	27
33	Vliet Street	26	30	29	26	26
35	35th Street	31	23	21	32	28
63	Silver Spring Drive	55	25	25	32	58
80	6th Street	24	20	20	24	30
	Group Average	30	21	21	26	34
Non-Minority						
15	Oakland - Kinnickinnic	30	26	26	28	33
28	108th Street	95	48	51		
55	Layton Avenue	38	40	40	38	
64	S. 60th	55	56	56		
68	Port Washington	49	57	57		
	Group Average	53	45	46	33	33
Minority and Non-Minority						
10	Humboldt - Wisconsin	34	28	28	31	40
11	Holton-Greenfield/Howell	29	24	24	22	29
14	Forest Home	32	26	26	31	29
18	National Avenue	26	26	18	25	25
19	King - S. 13th/S. 20th	30	20	20	22	35
21	North Avenue	28	16	20	22	27
22	Center Street	29	16	16	22	26
30	Sherman - Wisconsin	25	15	15	14	23
31	State - Highland	32	27	27	49	50
51	Oklahoma Avenue	24	28	28	38	35
53	Lincoln Avenue	35	37	37	36	35
54	Mitchell - Burnham	53	37	25	34	31
57	Walnut - Lisbon	41	30	33	32	44
60	Burleigh Street	37	22	21	21	43
62	Capitol Drive	28	23	17	23	29
67	N. 76th - S. 84th	58	31	31	59	57
76	N. 60th - S. 70th	48	23	26	30	30
	Group Average	35	25	24	30	35

Data is for Fall of 2011 service from 2011 MCTS Annual Ridership Statistics Book

2011 MCTS System On-Time Performance

Averaged by Day and Time

Month	Day	Percent on time at sample time shown			
		7:00 AM	12:00 PM	4:00 PM	9:00 PM
Jan	Weekday	93.62%	91.58%	90.71%	91.66%
	Saturday	92.70%	90.28%	90.55%	90.43%
	Sunday	94.00%	90.93%	93.43%	94.00%
Feb	Weekday	92.18%	90.22%	88.31%	90.03%
	Saturday	95.98%	87.16%	82.49%	84.77%
	Sunday	94.59%	88.54%	82.75%	88.87%
Mar	Weekday	94.95%	91.45%	91.11%	91.47%
	Saturday	95.85%	88.69%	88.78%	88.89%
	Sunday	94.17%	90.86%	91.24%	93.02%
Apr	Weekday	95.93%	90.01%	91.27%	92.33%
	Saturday	95.96%	88.44%	87.29%	87.52%
	Sunday	92.81%	88.75%	87.39%	87.34%
May	Weekday	95.63%	88.74%	90.24%	92.39%
	Saturday	95.48%	86.06%	90.24%	88.06%
	Sunday	94.24%	87.67%	87.41%	86.99%
Jun	Weekday	95.97%	88.92%	90.40%	90.82%
	Saturday	95.46%	90.43%	92.32%	92.59%
	Sunday	93.31%	62.81%	87.15%	88.68%
Jul	Weekday	95.75%	89.38%	91.38%	91.07%
	Saturday	91.81%	89.89%	86.82%	83.79%
	Sunday	92.86%	89.14%	90.52%	86.37%
Aug	Weekday	96.00%	89.20%	91.05%	90.37%
	Saturday	91.40%	89.11%	85.29%	80.78%
	Sunday	92.72%	88.59%	89.47%	83.35%
Sep	Weekday	94.98%	90.77%	90.76%	92.63%
	Saturday	93.23%	86.31%	85.56%	85.64%
	Sunday	93.91%	89.48%	89.72%	86.09%
Oct	Weekday	95.52%	91.06%	90.87%	92.35%
	Saturday	94.98%	88.96%	86.78%	89.02%
	Sunday	95.66%	90.64%	91.98%	89.62%
Nov	Weekday	95.59%	93.06%	91.28%	94.09%
	Saturday	91.85%	86.53%	87.85%	91.54%
	Sunday	94.99%	90.58%	93.49%	92.84%
Dec	Weekday	95.56%	94.34%	92.84%	94.03%
	Saturday	92.67%	91.77%	88.73%	90.94%
	Sunday	96.33%	92.50%	93.67%	91.30%
2011 Average	Weekday	95.14%	90.73%	90.85%	91.94%
	Saturday	93.95%	88.64%	87.73%	87.83%
	Sunday	94.13%	87.54%	89.85%	89.04%

2011 Title VI Route Evaluation Weekday Bus Hours and PBH

<u>Rte</u>	<u>Name</u>	<u>Type of Route</u>	<u>Bus Hours</u>	<u>Passengers per bus hour</u>
Minority				
12	12th - Wisconsin	Regular	188	41
23	Fond du Lac Avenue	Regular	211	42
27	27th Street	Regular	228	59
33	Vliet Street	Regular	39	25
35	35th Street	Regular	114	43
63	Silver Spring Drive	Regular	58	44
80	6th Street	Regular	192	39
			Group Average: 147	42
Non-Minority				
15	Oakland - Kinnickinnic	Regular	216	41
28	108th Street	Regular	43	20
55	Layton Avenue	Regular	44	30
64	S. 60th	Regular	25	14
68	Port Washington	Regular	31	15
			Group Average: 72	24
Minority and Non-Minority				
10	Humboldt - Wisconsin	Regular	205	36
11	Holton-Greenfield/Howell	Regular	121	33
14	Forest Home	Regular	102	38
18	National Avenue	Regular	140	43
19	King - S. 13th/S. 20th	Regular	210	37
21	North Avenue	Regular	136	39
22	Center Street	Regular	88	43
30	Sherman - Wisconsin	Regular	280	50
31	State - Highland	Regular	90	19
51	Oklahoma Avenue	Regular	87	33
53	Lincoln Avenue	Regular	71	31
54	Mitchell - Burnham	Regular	82	36
57	Walnut - Lisbon	Regular	86	25
60	Burleigh Street	Regular	112	41
62	Capitol Drive	Regular	150	51
67	N. 76th - S. 84th	Regular	121	38
76	N. 60th - S. 70th	Regular	171	37
			Group Average: 133	37

Data is for Fall of 2011 service from 2011 MCTS Annual Ridership Statistics Book

2011 Title VI Route Evaluation

Average Hours of the Day Served on Weekdays

<u>Rte</u>	<u>Name</u>	<u>Type of Route</u>	<u>Hours of Day Served</u>
Minority			
12	12th - Wisconsin	Regular	21
23	Fond du Lac Avenue	Regular	23
27	27th Street	Regular	22
33	Vliet Street	Regular	20
35	35th Street	Regular	22
63	Silver Spring Drive	Regular	21
80	6th Street	Regular	22
Group Average:			21
Non-Minority			
15	Oakland - Kinnickinnic	Regular	23
28	108th Street	Regular	16
55	Layton Avenue	Regular	19
64	S. 60th	Regular	13
68	Port Washington	Regular	19
Group Average:			18
Minority and Non-Minority			
10	Humboldt - Wisconsin	Regular	22
11	Holton-Greenfield/Howell	Regular	22
14	Forest Home	Regular	22
18	National Avenue	Regular	23
19	King - S. 13th/S. 20th	Regular	22
21	North Avenue	Regular	22
22	Center Street	Regular	21
30	Sherman - Wisconsin	Regular	22
31	State- Highland	Regular	19
51	Oklahoma Avenue	Regular	21
53	Lincoln Avenue	Regular	21
54	Mitchell - Burnham	Regular	21
57	Walnut - Lisbon	Regular	21
60	Burleigh Street	Regular	21
62	Capitol Drive	Regular	21
67	N. 76th - S. 84th	Regular	20
76	N. 60th - S. 70th	Regular	22
Group Average:			21

Hours of day Served = Time of last pull in subtracted from time of first pull out

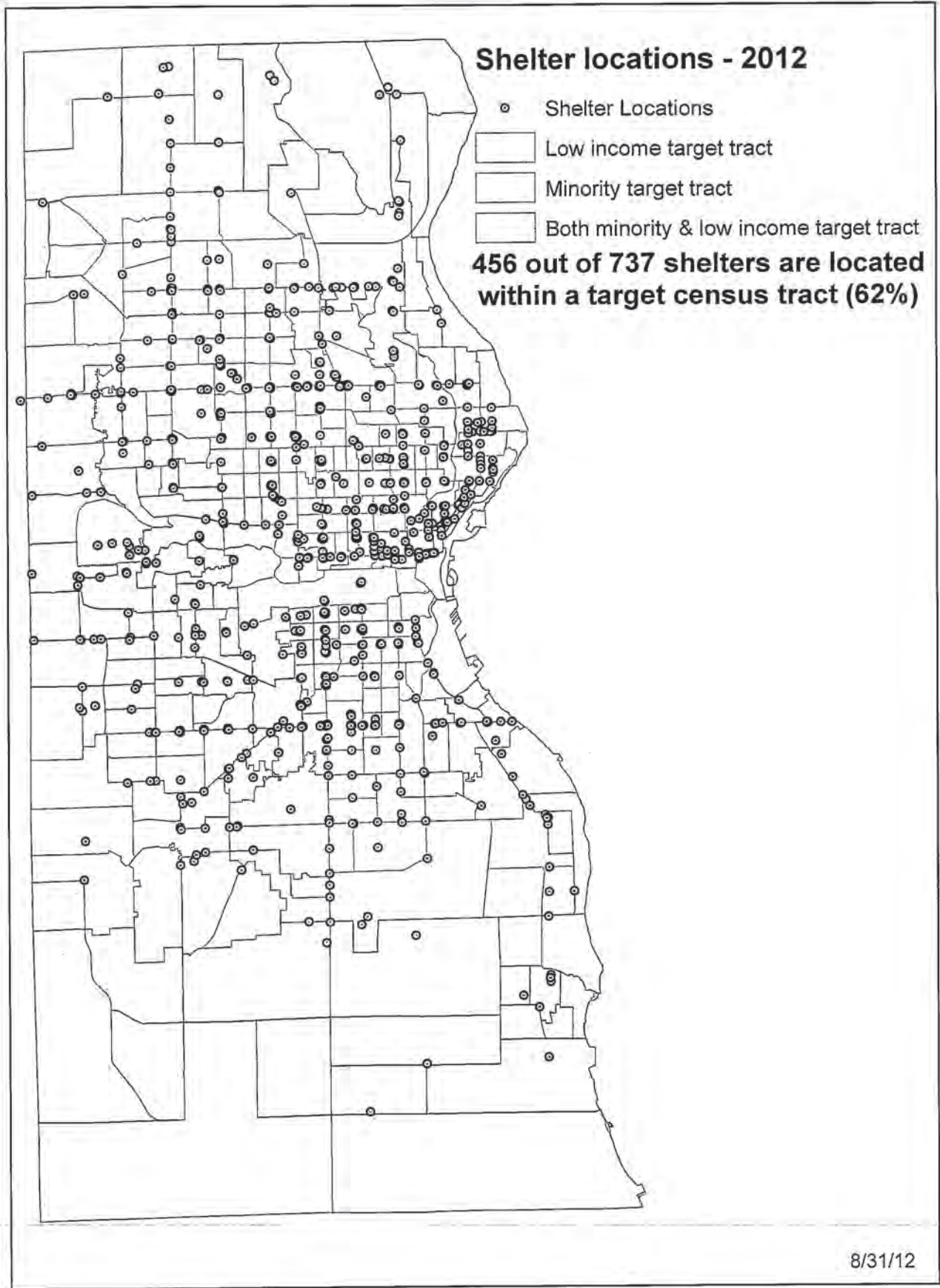
Data is from Fall of 2011 HASTUS Vehicle Schedule Overview

BUS DISTRIBUTION AND COUNT AS OF JUNE 21, 2012

	2000 New Flyer	2001 New Flyer	2002 New Flyer	2002 Gillig	2003 New Flyer	2004 New Flyer	2005 New Flyer	2006 New Flyer	2010 New Flyer	2011 New Flyer	2012 New Flyer
Fond du Lac Garage	<u>ALA</u> 4300, 4302, 4304, 4305, 4307, 4312, 4317, 4320, 4329, 4338, 4345, 4348, 4355, 4362, 4369, 4374, 4376, 4381, 4382, 4387 <u>NON-ALA</u> 4370, 4371	4426, 4428, 4429, 4430, 4431, 4432, 4433, 4434, 4435, 4436, 4437, 4438, 4439, 4440, 4441, 4442, 4443, 4444, 4445, 4446, 4448, 4449, 4450, 4451, 4452, 4453, 4463, 4466, 4468,			4709 (Brewer Bus)			5000-5008	5100-5123		5300-5354
140	22	29	0	0	1	0	0	9	24		55
Fiebrantz MCTS Buses 97 Oz Buses 5 102	0	0	0	1000-1004	4700-4708 4710-4732	4800-4829				5200-5234	
102	0	0	0	5	32	30	0	0	0	35	
Kinnickinnic Garage	0	4404, 4409, 4410, 4415, 4416, 4418, 4420, 4421, 4422, 4423, 4424	4600-4603 4605-4639		4733-4750		4900-4914		5124-5189		
149	0	11	39	0	18	0	15	0	66		
Active Buses 391	22	40	39	5	51	30	15	9	90	35	55
MCTS Buses 386											

<u>Active Vehicles</u>		<u>Count</u>	<u>Length/Seats</u>
2000	New Flyers	4300-4389	22 40' / 39
2001	New Flyers	4400-4468	40 40' / 39
2002	New Flyers	4600-4639	39 40' / 39
2002	Ozaukee Gilligs	1000-1004	5 40' / 37
2003	New Flyers	4700-4750	51 40' / 39
2004	New Flyers	4800-4829	30 40' / 39
2005	New Flyers	4900-4914	15 40' / 39
2006	New Flyers	5000-5008	9 40' / 39
2010	New Flyers	5100-5189	90 40' / 39
2011	New Flyers	5200-5234	35 40' / 39
2012	New Flyers	5300-5354	55 40' / 39
Total Active Buses:		391	
Average Age:		5.74	

<u>Buses for Sale (Inactive)</u>		
Group 14:	4501, 4507, 4509, 4510	4
Group 15:	4365, 4377, 4407, 4425, 4427, 4464	6
Out of Service Buses:		10
Active MCTS 40' Buses:	386	
Active Ozaukee 40' Buses:	5	
Total Active Buses:	391	
Out of Service Buses:	10	
Contingency Fleet:	25	
Grand Total:	426	



**Milwaukee County Transit System
Interoffice Memorandum**

DATE: June 2, 2014

TO: File

FROM: Mark McComb

SUBJECT: 2012 Title VI Assessment of Compliance - Requirement to Monitor Transit Service

Planning staff have annually compared the level and quality of transit service in minority and non-minority areas to ensure that the application of MCTS standards and policies results in an equitable distribution per Title VI guidelines. MCTS followed the service monitoring procedures described in the “Level of Service Methodology” section in Title VI regulations (FTA C 4702.1A, Page V-7). The ridership and service hours data used in this analysis were taken from the September 2012 schedule period.

For the purposes of assessing compliance with Title VI, a census tract was identified as minority if the concentration of minority residents in that tract exceeded the countywide average for minority residents. According to U.S. Census statistics from 2010, 45.7% of the population of Milwaukee County is made up of ethnic minorities who are not white and not Hispanic. Similarly, census tracts with a percentage of minority residents less than the countywide average were identified as a non-minority tract. Given these definitions, each MCTS bus route was identified as primarily serving:

- Minority areas
 - If > 33.3% of the route mileage operated within minority tracts
- Non-Minority areas.
 - If < 33.3% of the route mileage operated within minority tracts

Service Standards

Vehicle Load - Average maximum loads were calculated during the a.m. and p.m. peak periods for each regular route (see table – 2012 Weekday Average Maximum Load Factors). All regular routes are well below the 1.3 standard. The highest maximum loads were on routes that traveled through areas that served minority populations, however these load factors well still well below the standard.

Vehicle Headways – All routes are provided with sufficient service to meet demand. The headways of routes that serve minority areas are better than the headways on routes that serve non-minority areas (see table – 2012 Weekday, Saturday, or Sunday Average Headways for Regular Routes).

On Time Performance - All operators are required to meet an on-time performance standard of being between one minute early and three minutes late at a time point. MCTS regularly monitors on-time performance throughout the system. MCTS has set a system wide on-time standard of 90%. Data from 2012 shows that weekday service met this standard, while weekend service fell slightly short with an average on-time performance in the upper 80% range (see table – 2012 MCTS System On-Time Performance). MCTS will continue to work towards improving weekend on-time performance to meet the standard by 2013.

Distribution of Transit Amenities – The supply and demand for transit service is measured according to the number of passenger per bus hour (PBH) on a route. The application of this measure to the system produces an equitable distribution of bus hours (see table – 2012 Weekday Bus Hours and PBH). While the passengers per bus hour is higher on route that serve minority populations, the greater number of bus hours allocated to these routes shows that service hours are being allocated appropriately.

The distribution of bus shelters is based on a scoring system that rates several factors, e.g., daily ridership at the bus stop, if the stop is at a transfer corner, and the level of exposure to the weather at the stop. Most of the highest utilized bus stops, and thus shelters, are in areas that have a high minority population. In 2012, 62% of MCTS shelters were located in census tracts identified as predominantly minority. (See map – Shelter locations 2012)

Route guides and timetables are extensively distributed throughout the community. An entire set of all routes guides can be found at libraries, government offices, and employment centers. Timetables for the specific route are also available on-board the vehicle, with changes to the timetable being made available prior to implementation. Passengers can have printed timetables mailed to them, and may access schedule information via a mobile phone or the internet. Passengers are able to purchase tickets and passes at several grocery stores, gas stations, and banks/credit unions.

Service Availability – The span of service, e.g., from 5:00 a.m. until 1:00 a.m., is equitably distributed among both minority and non-minority areas (2012 – Average Hours of the Day Served on Weekdays). No route identified as service minority areas receives less than a 19-hour span of service on Weekdays.

Service Policies

Vehicle Assignment – MCTS’s fleet is fairly standardized with regard to amenities. All 40-foot vehicles are standard New Flyer coaches with two doors, standard seats, and auxiliary heating and air conditioning (see table - Bus Distribution and Count). All vehicles are available for use on any route, and are assigned in no particular order.

Transit Security – In addition to the oversight provided by the Manager of Security and Street Operations, the primary security-related support to on bus incidents is provided by a private security firm contracted by MTS. G4S Secure Solutions Inc. employs over 30 Custom Protection Officers (CPOs) and provides over 1360 hours of weekly service, of

which about 70% of weekday hours are spent riding buses. Contract Security managers and the Manager of Security and Street Operations work together to assign priority for bus riding to the routes and times of day where the data suggest a higher likelihood for security incidents to occur. They work to provide appropriate coverage for vehicle response and assign special teams to operators who report specific incidents. Data collected from operator calls through the CAD/AVL are mapped and graphed to aid the security team in the development of sound security deployment strategies.

Beyond the coordination with security and law enforcement, several additional measures are taken to ensure a safe environment for both employees and passengers. The Manager of Security and Street Operations meets monthly with representatives from the operator's union and management to address and discuss security issues. To deter and detect criminal activity, there are four security cameras (both video and audio) installed on every bus, and MCTS partnered with the Milwaukee Police Department to secure a grant to install over 20 cameras at major transfer corners throughout the city. These cameras are owned and operated by MPD, but purchased through a Transit Security Grant.

The Manager of Security and Street Operations trains all new operators in safe passenger interaction techniques and conflict communication skills. New operators also receive training on suspicious activity recognition through nationally recognized "Transit Watch" program. This program is aimed to raise passenger and employee awareness of suspicious persons, activity and potential threats to our transportation infrastructure. Campaign materials were funded through a Transit Security grant and are available in both English and Spanish as well as on the website.

2012 Title VI Route Evaluation
Weekday Average Maximum Load Factors For Regular Routes During AM and PM Peak Periods

<u>Rte</u>	<u>Name</u>	<u>Category</u>	<u>Load Factor</u>	
			<u>AM</u>	<u>PM</u>
	Minority			
BLU	Fond du Lac - National MetroEXpress	Minority	0.79	0.74
RED	Capitol Drive MetroEXpress	Minority	0.74	0.74
12	Teutonia - Hampton	Minority	0.64	0.77
14	Forest Home	Minority	0.59	0.69
19	M.L. King/S.13th & S. 20th	Minority	0.67	0.74
21	North Avenue	Minority	0.56	0.59
22	Center Street	Minority	0.64	0.67
23	Fond du Lac- National	Minority	0.72	0.79
27	27th Street	Minority	0.77	0.82
30	Sherman - Wisconsin	Minority	0.82	0.74
31	State - Highland	Minority	0.31	0.46
33	Vliet Street	Minority	0.44	0.41
35	35th Street	Minority	0.64	0.77
54	Mitchell - Burnham	Minority	0.54	0.46
57	Walnut - 92nd	Minority	0.62	0.56
60	Burleigh Street	Minority	0.67	0.64
62	Capitol Drive	Minority	0.51	0.46
63	Silver Spring Drive - Port Washington	Minority	0.56	0.64
67	N. 76th - S. 84th	Minority	0.59	0.59
76	N. 60th - S. 70th	Minority	0.64	0.67
80	6th Street	Minority	0.67	0.69
Group Average			0.63	0.65
	Non-Minority			
GRE	Bayshore - Airport	Non-Minority	0.64	0.74
10	Humboldt - Wisconsin	Non-Minority	0.85	0.72
15	Holton - Kinnickinnic	Non-Minority	0.54	0.72
28	108th Street	Non-Minority	0.18	0.26
51	Oklahoma Avenue	Non-Minority	0.54	0.56
52	Clement - 15th Ave	Non-Minority	0.23	0.21
53	Lincoln Avenue	Non-Minority	0.44	0.46
55	Layton Avenue	Non-Minority	0.31	0.41
56	Greenfield Avenue	Non-Minority	0.31	0.41
64	S. 60th Street	Non-Minority	0.15	0.15
Group Average			0.42	0.46

Maximum loads are based on the average of the maximum number of people aboard each trip from 6a-9a or 3p-6p in the peak direction from APC route trip list report data for Fall of 2011.

Load Factor is calculated by taking the average of the peak period, peak direction maximum trip loads divided by the number of seats on a standard 40 foot bus (39 seats)

2012 Title VI Route Evaluation

Weekday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM_HW</u>	<u>MD_HW</u>	<u>PM_HW</u>	<u>EVE_HW</u>	<u>LN_HW</u>
Minority						
RED	Capitol Drive MetroEXpress	15	17	15	26	25
BLU	Fond du Lac - National MetroEXpress	20	23	18	29	38
12	Teutonia - Hampton	10	12	11	16	20
14	Forest Home	19	19	20	28	28
19	King - S. 13th/S. 20th	12	16	16	16	22
21	North Avenue	16	16	11	18	27
22	Center Street	16	18	16	22	30
23	Fond du Lac - National	20	23	20	29	37
27	27th Street	10	10	11	16	22
30	Sherman - Wisconsin	9	9	8	16	15
31	State - Highland	19	22	21	26	25
33	Vliet Street	35	33	37	25	25
35	35th Street	18	22	16	24	24
54	Mitchell - Burnham	29	28	29	31	30
57	Walnut -N. 92nd	25	26	28	29	33
60	Burleigh Street	21	20	18	22	27
62	Capitol Drive	17	23	16	24	24
63	Silver Spring - Pt. Washington	25	25	25	24	40
67	N. 76th - S. 84th	16	22	17	25	43
76	N. 60th - S. 70th	16	20	17	27	25
80	6th Street	11	15	13	22	21
Group Average		18	20	18	24	28
Non-Minority						
GRE	Oakland - Howell MetroEXpress	13	13	11	21	21
10	Humboldt - Wisconsin	18	21	15	29	26
15	Holton - Kinnickinnic	20	20	21	27	28
28	108th Street	26	27	29	40	40
51	Oklahoma Avenue	25	23	17	27	27
52	Clement - 15th Avenue	42	42	45	67	86
53	Lincoln Avenue	20	26	22	23	25
55	Layton Avenue	30	30	32	45	44
56	Greenfield Avenue	27	27	29	25	43
64	S. 60th	41	40	42	40	40
Group Average		26	27	26	34	38

Data is for Fall of 2012 service from 2012 MCTS Annual Ridership Statistics Book

2012 Title VI Route Evaluation Saturday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM_HW</u>	<u>MD_HW</u>	<u>PM_HW</u>	<u>EVE_H</u>	<u>LN_HW</u>
Minority						
RED	Capitol Drive MetroEXpress	32	26	27	33	46
BLU	Fond du Lac - National MetroEXpress	37	30	29	36	42
12	Teutonia - Hampton	25	21	17	18	34
14	Forest Home	34	28	28	32	30
19	King - S. 13th/S. 20th	19	18	18	19	25
21	North Avenue	18	18	19	25	28
22	Center Street	26	23	23	21	27
23	Fond du Lac - National	38	34	29	37	42
27	27th Street	15	13	13	14	25
30	Sherman - Wisconsin	13	12	12	17	17
31	State - Highland	38	28	26	38	45
33	Vliet Street	28	30	30	30	27
35	35th Street	32	24	22	26	30
54	Mitchell - Burnham	43	47	47	45	44
57	Walnut -N. 92nd	46	33	33	30	29
60	Burleigh Street	40	25	22	21	30
62	Capitol Drive	27	23	23	33	31
63	Silver Spring - Pt. Washington	31	28	24	23	37
67	N. 76th - S. 84th	60	33	33	32	60
76	N. 60th - S. 70th	25	20	19	27	26
80	6th Street	25	21	24	25	34
Group Average		31	25	25	28	34
Non-Minority						
GRE	Oakland - Howell MetroEXpress	28	19	19	21	28
10	Humboldt - Wisconsin	30	30	30	30	30
15	Holton - Kinnickinnic	31	33	33	39	49
28	108th Street	50	36	42	51	
51	Oklahoma Avenue	28	28	29	41	39
52	Clement - 15th Avenue	40	43	41	81	79
53	Lincoln Avenue	37	38	38	38	38
55	Layton Avenue	28	30	31	43	42
56	Greenfield Avenue	30	25	25	35	41
64	S. 60th	139	59	59		
Group Average		44	34	35	42	43

Data is for Fall of 2012 service from 2012 MCTS Annual Ridership Statistics Book

2012 Title VI Route Evaluation

Sunday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM_HW</u>	<u>MD_HW</u>	<u>PM_HW</u>	<u>EVE_HW</u>	<u>LN_HW</u>
Minority						
RED	Capitol Drive MetroExpress	29	26	25	30	45
BLU	Fond du Lac - National MetroExpress	47	38	37	38	63
12	Teutonia - Hampton	25	16	16	27	32
14	Forest Home	33	29	29	33	31
19	King - S. 13th/S. 20th	19	18	18	19	25
21	North Avenue	27	21	20	23	29
22	Center Street	29	21	21	22	29
23	Fond du Lac - National	48	38	37	38	61
27	27th Street	18	15	15	20	25
30	Sherman - Wisconsin	22	16	14	18	25
31	State - Highland	36	27	25	49	50
33	Vliet Street	26	29	29	27	26
35	35th Street	31	23	21	26	31
54	Mitchell - Burnham	42	33	31	44	43
57	Walnut -N. 92nd	41	30	33	32	44
60	Burleigh Street	40	25	22	21	30
62	Capitol Drive	29	33	31	32	31
63	Silver Spring - Pt. Washington	30	28	26	31	50
67	N. 76th - S. 84th	58	31	31	37	59
76	N. 60th - S. 70th	32	24	28	31	283
80	6th Street	27	21	20	27	32
Group Average		33	26	25	30	50
Non-Minority						
GRE	Oakland - Howell Metro Express	29	25	25	25	36
10	Humboldt - Wisconsin	29	28	28	26	37
15	Holton - Kinnickinnic	37	31	33	38	37
28	108th Street	103	48	35	38	
51	Oklahoma Avenue	24	28	28	40	39
52	Clement - 15th Avenue	41	41	42	88	79
53	Lincoln Avenue	35	37	37	36	35
55	Layton Avenue	21	30	30	42	
56	Greenfield Avenue	41	33	32	46	41
64	S. 60th	55	56	56		
Group Average		42	36	35	42	43

Data is for Fall of 2012 service from 2012 MCTS Annual Ridership Statistics Book

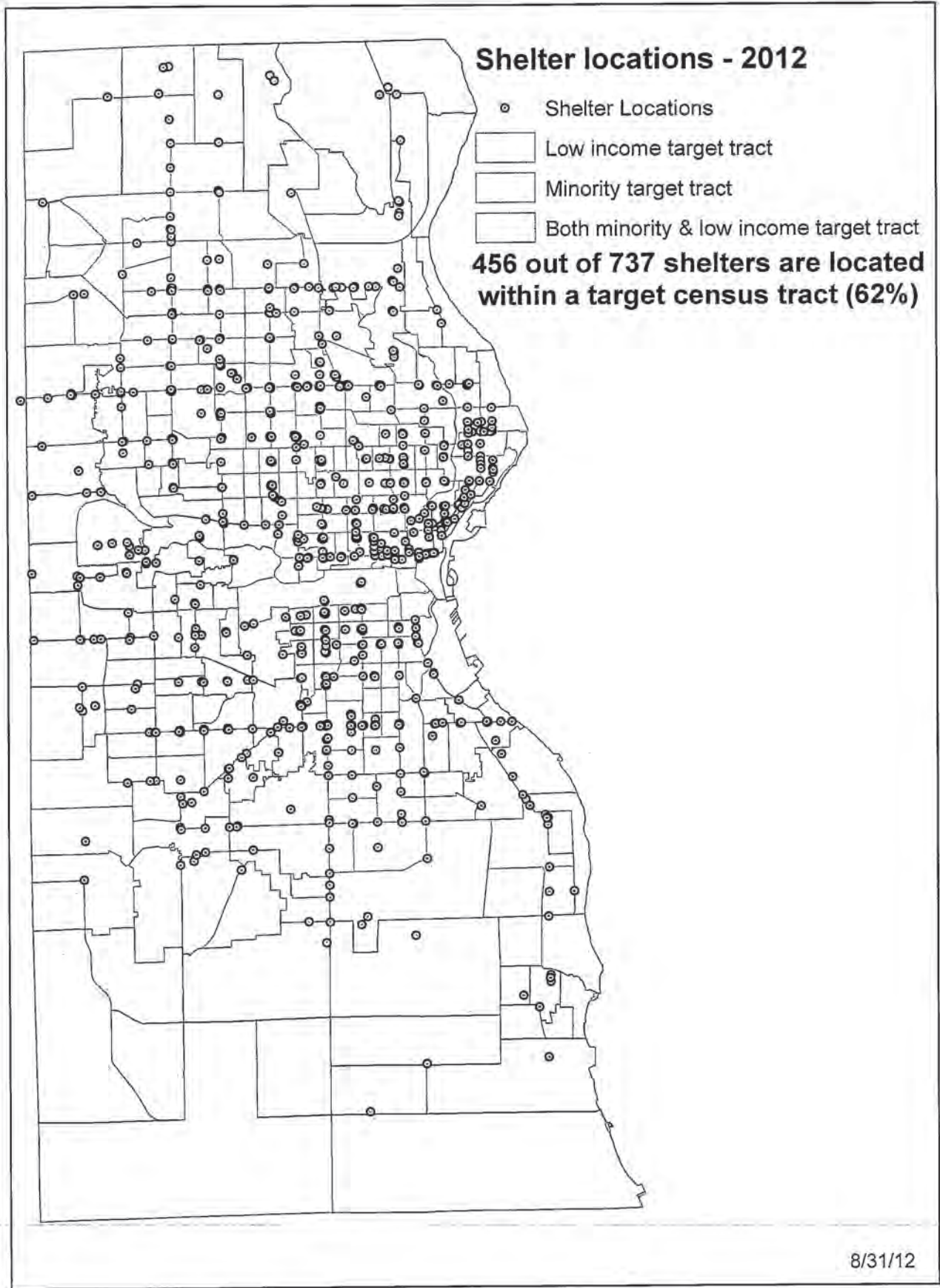
2012 MCTS System On-Time Performance Averaged by Day and Time

Month	Day	Percent on time at sample time shown			
		7:00 AM	12:00 PM	4:00 PM	9:00 PM
Jan	Weekday	93.53%	92.44%	91.42%	90.87%
	Saturday	93.99%	88.69%	86.66%	86.98%
	Sunday	91.87%	89.97%	92.15%	90.56%
Feb	Weekday	94.77%	92.12%	91.72%	91.46%
	Saturday	92.41%	89.87%	85.64%	83.22%
	Sunday	91.00%	90.68%	89.12%	90.19%
Mar	Weekday	93.74%	92.78%	92.60%	91.71%
	Saturday	95.32%	91.30%	89.75%	87.46%
	Sunday	91.98%	92.88%	90.84%	91.80%
Apr	Weekday	95.55%	91.37%	91.11%	94.02%
	Saturday	96.07%	91.28%	86.22%	86.99%
	Sunday	93.77%	90.91%	90.46%	89.29%
May	Weekday	95.12%	91.25%	87.97%	92.68%
	Saturday	96.59%	91.30%	83.47%	84.20%
	Sunday	93.52%	90.34%	87.79%	87.55%
Jun	Weekday	95.62%	91.02%	88.71%	91.07%
	Saturday	96.53%	86.04%	83.52%	84.03%
	Sunday	93.78%	90.84%	89.08%	88.30%
Jul	Weekday	95.33%	90.97%	90.72%	90.44%
	Saturday	94.82%	90.95%	89.02%	85.49%
	Sunday	95.47%	91.67%	88.93%	88.51%
Aug	Weekday	95.53%	91.24%	90.88%	91.11%
	Saturday	94.07%	91.06%	87.66%	82.53%
	Sunday	95.08%	91.35%	87.74%	87.11%
Sep	Weekday	95.18%	92.07%	86.92%	91.08%
	Saturday	95.14%	84.38%	83.23%	86.91%
	Sunday	94.43%	88.74%	89.03%	88.10%
Oct	Weekday	95.23%	93.54%	90.20%	94.78%
	Saturday	94.28%	89.83%	84.89%	87.92%
	Sunday	93.19%	90.50%	90.85%	90.51%
Nov	Weekday	96.16%	94.86%	91.69%	94.30%
	Saturday	92.04%	90.61%	88.01%	92.46%
	Sunday	93.67%	92.78%	90.68%	90.74%
Dec	Weekday	96.42%	95.95%	91.11%	92.95%
	Saturday	94.33%	90.68%	89.13%	89.32%
	Sunday	93.50%	92.06%	85.44%	87.76%
2012 Average	Weekday	95.18%	92.47%	90.42%	92.21%
	Saturday	94.63%	89.67%	86.43%	86.46%
	Sunday	93.44%	91.06%	89.34%	89.20%

2012 Title VI Route Evaluation Weekday Bus Hours and PBH

<u>Rte</u>	<u>Name</u>	<u>Type of Route</u>	<u>Bus Hours</u>	<u>Passengers per bus</u>
Minority				
RED	Capitol Drive MetroEXpre	Regular	117	46
BLU	Fond du Lac - National M	Regular	169	43
10	Humboldt - Wisconsin	Regular	184	40
12	12th - Wisconsin	Regular	188	49
14	Forest Home	Regular	105	33
19	King - S. 13th/S. 20th	Regular	214	37
21	North Avenue	Regular	142	45
22	Center Street	Regular	75	74
23	Fond du Lac Avenue	Regular	183	40
27	27th Street	Regular	239	59
30	Sherman - Wisconsin	Regular	298	52
31	State - Highland	Regular	95	21
33	Vliet Street	Regular	40	22
35	35th Street	Regular	104	47
54	Mitchell - Burnham	Regular	74	40
57	Walnut - Lisbon	Regular	75	36
60	Burleigh Street	Regular	95	53
62	Capitol Drive	Regular	73	52
63	Silver Spring Drive	Regular	72	53
67	N. 76th - S. 84th	Regular	135	41
76	N. 60th - S. 70th	Regular	186	36
80	6th Street	Regular	203	30
Group Average:			139	43
Non-Minority				
GRE	Bayshore - Airport	Regular	213	36
15	Oakland - Kinnickinnic	Regular	160	31
28	108th Street	Regular	62	18
51	Oklahoma Avenue	Regular	79	40
52	Clement - 15th Ave	Regular	33	14
53	Lincoln Avenue	Regular	67	33
55	Layton Avenue	Regular	51	26
56	Greenfield Avenue	Regular	70	27
64	S. 60th Street	Regular	28	15
Group Average:			85	27

Data is for Fall of 2012 service from 2012 MCTS Annual Ridership Statistics Book



2012 Title VI Route Evaluation

Average Hours of the Day Served on Weekdays

<u>Rte</u>	<u>Name</u>	<u>Type of Route</u>	<u>Hours of Day</u>
Minority			
RED	Capitol Drive MetroEXpress	Regular	21
BLU	Fond du Lac - National MetroEXpress	Regular	23
12	Teutonia - Hampton	Regular	21
14	Forest Home	Regular	22
19	ML King - S. 13th/S. 20th	Regular	22
21	North Avenue	Regular	22
22	Center Street	Regular	21
23	Fond du Lac - National	Regular	24
27	27th Street	Regular	22
30	Sherman - Wisconsin	Regular	22
31	State- Highland	Regular	19
33	Vliet Street	Regular	20
35	35th Street	Regular	22
57	Walnut - N.92nd	Regular	21
60	Burleigh Street	Regular	21
62	Capitol Drive	Regular	20
63	Silver Spring - Port Washington	Regular	21
67	N. 76th - S. 84th	Regular	22
76	N. 60th - S. 70th	Regular	22
80	6th Street	Regular	22
Group Average:			21
Non-Minority			
GRE	Oakland - Howell MetroEXpress	Regular	24
10	Humboldt - Wisconsin	Regular	22
15	Holton - Kinnickinnic	Regular	24
28	108th Street	Regular	15
51	Oklahoma Avenue	Regular	21
52	Clement - 15th Avenue	Regular	20
53	Lincoln Avenue	Regular	21
54	Mitchell - Burnham	Regular	22
55	Layton Avenue	Regular	17
56	Greenfield Avenue	Regular	22
64	S. 60th Street	Regular	14
Group Average:			20

Hours of day Served = Time of last pull in subtracted from time of first pull out
 Data is from Fall of 2012 HASTUS Vehicle Schedule Overview

BUS DISTRIBUTION AND COUNT AS OF JUNE 21, 2012

	2000 New Flyer	2001 New Flyer	2002 New Flyer	2002 Gillig	2003 New Flyer	2004 New Flyer	2005 New Flyer	2006 New Flyer	2010 New Flyer	2011 New Flyer	2012 New Flyer
Fond du Lac Garage	<u>ALA</u> 4300, 4302, 4304, 4305, 4307, 4312, 4317, 4320, 4329, 4338, 4345, 4348, 4355, 4362, 4369, 4374, 4376, 4381, 4382, 4387 <u>NON-ALA</u> 4370, 4371	4426, 4428, 4429, 4430, 4431, 4432, 4433, 4434, 4435, 4436, 4437, 4438, 4439, 4440, 4441, 4442, 4443, 4444, 4445, 4446, 4448, 4449, 4450, 4451, 4452, 4453, 4463, 4466, 4468,			4709 (Brewer Bus)			5000-5008	5100-5123		5300-5354
140	22	29	0	0	1	0	0	9	24		55
Fiebrantz MCTS Buses 97 Oz Buses 5 102	0	0	0	1000-1004 5	4700-4708 4710-4732 32	4800-4829 30	0	0	0	5200-5234 35	
Kinnickinnic Garage	0	4404, 4409, 4410, 4415, 4416, 4418, 4420, 4421, 4422, 4423, 4424 11	4600-4603 4605-4639 39	0	4733-4750 18	0	4900-4914 15	0	5124-5189 66		
Active Buses 391	22	40	39	5	51	30	15	9	90	35	55
MCTS Buses 386											

<u>Active Vehicles</u>		<u>Count</u>	<u>Length/Seats</u>
2000	New Flyers	4300-4389	22 40' / 39
2001	New Flyers	4400-4468	40 40' / 39
2002	New Flyers	4600-4639	39 40' / 39
2002	Ozaukee Gilligs	1000-1004	5 40' / 37
2003	New Flyers	4700-4750	51 40' / 39
2004	New Flyers	4800-4829	30 40' / 39
2005	New Flyers	4900-4914	15 40' / 39
2006	New Flyers	5000-5008	9 40' / 39
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2012	New Flyers	5300-5354	55 40' / 39
Total Active Buses:		391	
Average Age:		5.74	

<u>Buses for Sale (Inactive)</u>		
Group 14:	4501, 4507, 4509, 4510	4
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**Milwaukee County Transit System
Interoffice Memorandum**

DATE: June 2, 2014

TO: File

FROM: Mark McComb

SUBJECT: 2013 Title VI Assessment of Compliance - Requirement to Monitor Transit Service

Planning staff have annually compared the level and quality of transit service in minority and non-minority areas to ensure that the application of MCTS standards and policies results in an equitable distribution per Title VI guidelines. MCTS followed the service monitoring procedures described in the “Level of Service Methodology” section in Title VI regulations (FTA C 4702.1A, Page V-7). The ridership and service hours data used in this analysis were taken from the September 2013 schedule period.

For the purposes of assessing compliance with Title VI, a census tract was identified as minority if the concentration of minority residents in that tract exceeded the countywide average for minority residents. According to U.S. Census statistics from 2010, 45.7% of the population of Milwaukee County is made up of ethnic minorities who are not white and not Hispanic. Similarly, census tracts with a percentage of minority residents less than the countywide average were identified as a non-minority tract. Given these definitions, each MCTS bus route was identified as primarily serving:

- Minority areas
 - If > 33.3% of the route mileage operated within minority tracts
- Non-Minority areas.
 - If < 33.3% of the route mileage operated within minority tracts

Service Standards

Vehicle Load - Average maximum loads were calculated during the a.m. and p.m. peak periods for each regular route (see table – 2013 Weekday Average Maximum Load Factors). All regular routes are well below the 1.3 standard. The highest maximum loads were on routes that traveled through areas that served minority populations, however these load factors well still well below the standard.

Vehicle Headways – All routes are provided with sufficient service to meet demand. The headways of routes that serve minority areas are better than the headways on routes that serve non-minority areas (see table – 2013 Weekday, Saturday, or Sunday Average Headways for Regular Routes).

On Time Performance - All operators are required to meet an on-time performance standard of being between one minute early and three minutes late at a time point. MCTS regularly monitors on-time performance throughout the system. MCTS has set a system wide on-time standard of 90%. Data from 2013 shows that service met this standard daily (see table – 2013 MCTS System On-Time Performance). In recent years, the on-time performance of weekend services was in the upper 80% range, and MCTS set a 2013 goal of achieving a 90% or better on-time performance for all days of service; MCTS has achieved this goal, and is now meeting this standard.

Distribution of Transit Amenities – The supply and demand for transit service is measured according to the number of passenger per bus hour (PBH) on a route. The application of this measure to the system produces an equitable distribution of bus hours (see table – 2013 Weekday Bus Hours and PBH). While the passengers per bus hour is higher on route that serve minority populations, the greater number of bus hours allocated to these routes shows that service hours are being allocated appropriately.

The distribution of bus shelters is based on a scoring system that rates several factors, e.g., daily ridership at the bus stop, if the stop is at a transfer corner, and the level of exposure to the weather at the stop. Most of the highest utilized bus stops, and thus shelters, are in areas that have a high minority population. In 2012, 62% of MCTS shelters were located in census tracts identified as predominantly minority.

Route guides and timetables are extensively distributed throughout the community. An entire set of all routes guides can be found at libraries, government offices, and employment centers. Timetables for the specific route are also available on-board the vehicle, with changes to the timetable being made available prior to implementation. Passengers can have printed timetables mailed to them, and may also access schedule information via a mobile phone or the internet. Passengers are able to purchase tickets and passes at several grocery stores, gas stations, and banks/credit unions.

Service Availability – The span of service, e.g., from 5:00 a.m. until 1:00 a.m., is equitably distributed among both minority and non-minority areas (2013 – Average Hours of the Day Served on Weekdays). No route identified as service minority areas receives less than a 19-hour span of service on Weekdays.

Service Policies

Vehicle Assignment – MCTS’s fleet is fairly standardized with regard to amenities. All 40-foot vehicles are standard New Flyer coaches with two doors, standard seats, and auxiliary heating and air conditioning (see table - Bus Distribution and Count). All vehicles are available for use on any route, and are assigned in no particular order.

Transit Security – In addition to the oversight provided by the Manager of Security and Street Operations, the primary security-related support to on bus incidents is provided by a private security firm contracted by MTS. G4S Secure Solutions Inc. employs over 30

Custom Protection Officers (CPOs) and provides over 1360 hours of weekly service, of which about 70% of weekday hours are spent riding buses. Contract Security managers and the Manager of Security and Street Operations work together to assign priority for bus riding to the routes and times of day where the data suggest a higher likelihood for security incidents to occur. They work to provide appropriate coverage for vehicle response and assign special teams to operators who report specific incidents. Data collected from operator calls through the CAD/AVL are mapped and graphed to aid the security team in the development of sound security deployment strategies.

Beyond the coordination with security and law enforcement, several additional measures are taken to ensure a safe environment for both employees and passengers. The Manager of Security and Street Operations meets monthly with representatives from the operator's union and management to address and discuss security issues. To deter and detect criminal activity, there are four security cameras (both video and audio) installed on every bus, and MCTS partnered with the Milwaukee Police Department to secure a grant to install over 20 cameras at major transfer corners throughout the city. These cameras are owned and operated by MPD, but purchased through a Transit Security Grant.

The Manager of Security and Street Operations trains all new operators in safe passenger interaction techniques and conflict communication skills. New operators also receive training on suspicious activity recognition through nationally recognized "Transit Watch" program. This program is aimed to raise passenger and employee awareness of suspicious persons, activity and potential threats to our transportation infrastructure. Campaign materials were funded through a Transit Security grant and are available in both English and Spanish as well as on the website.

2013 Title VI Route Evaluation
Weekday Average Maximum Load Factors For Regular Routes During AM and PM Peak Periods

<u>Rte</u>	<u>Name</u>	<u>Category</u>	<u>Load Factor</u>	
			<u>AM</u>	<u>PM</u>
Minority				
RED	Capitol Drive	Minority	0.80	0.74
BLU	Fond du Lac - National	Minority	0.86	0.94
12	Teutonia - Hampton	Minority	0.71	0.83
14	Forest Home	Minority	0.57	0.80
19	M.L. King/S.13th & S. 20th	Minority	0.69	0.86
21	North Avenue	Minority	0.63	0.66
22	Center Street	Minority	0.66	0.69
23	Fond du Lac- National	Minority	0.74	0.77
27	27th Street	Minority	0.63	0.80
30	Sherman - Wisconsin	Minority	0.80	0.89
31	State - Highland	Minority	0.40	0.66
33	Vliet Street	Minority	0.46	0.37
35	35th Street	Minority	0.66	0.71
54	Mitchell - Burnham	Minority	0.51	0.43
57	Walnut - 92nd	Minority	0.57	0.60
60	Burleigh Street	Minority	0.71	0.74
62	Capitol Drive	Minority	0.49	0.57
63	Silver Spring Drive - Port Washington	Minority	0.69	0.69
67	N. 76th - S. 84th	Minority	0.71	0.66
76	N. 60th - S. 70th	Minority	0.57	0.83
80	6th Street	Minority	0.71	0.63
Group Average			0.65	0.71
Non-Minority				
GRE	Bayshore - Airport	Non-Minority	0.71	0.77
10	Humboldt - Wisconsin	Non-Minority	0.86	0.71
15	Holton - Kinnickinnic	Non-Minority	0.60	0.71
28	108th Street	Non-Minority	0.26	0.34
51	Oklahoma Avenue	Non-Minority	0.57	0.51
52	Clement - 15th Ave	Non-Minority	0.26	0.26
53	Lincoln Avenue	Non-Minority	0.43	0.46
55	Layton Avenue	Non-Minority	0.31	0.34
56	Greenfield Avenue	Non-Minority	0.37	0.46
64	S. 60th Street	Non-Minority	0.29	0.23
Group Average			0.47	0.48

Maximum loads are based on the average of the maximum number of people aboard each trip from 6a-9a or 3p-6p in the peak direction from APC route trip list report data for Fall of 2013.

Load Factor is calculated by taking the average of the peak period, peak direction maximum trip loads divided by the number of seats on a standard 40 foot bus (35 seats)

2013 Title VI Route Evaluation

Weekday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM_HW</u>	<u>MD_HW</u>	<u>PM_HW</u>	<u>EVE_HW</u>	<u>LN_HW</u>
Minority						
RED	Capitol Drive MetroEXpress	15	19	14	33	33
BLU	Fond du Lac - National MetroEXpress	22	31	18	43	42
12	Teutonia-Hampton	10	12	11	16	19
14	Forest Home	20	20	21	27	29
19	ML King - S. 13th/S. 20th	14	16	15	16	20
21	North Avenue	15	17	12	17	29
22	Center Street	15	18	15	22	30
23	Fond du Lac- National	12	24	19	29	38
27	27th Street	11	11	12	17	22
30	Sherman - Wisconsin	6	9	9	14	16
31	State - Highland	18	22	24	23	26
33	Vliet Street	29	32	38	26	25
35	35th Street	18	22	17	24	31
54	Mitchell - Burnham	29	27	28	30	30
57	Walnut - Lisbon	25	26	28	25	31
60	Burleigh Street	21	21	21	25	26
62	Capitol Drive	18	18	19	18	29
63	Silver Spring - PT. Washington	25	25	26	24	44
67	N. 76th - S. 84th	15	22	19	23	58
76	N. 60th - S. 70th	19	20	14	28	36
80	6th Street	13	15	13	22	24
Group Average		18	20	19	24	30
GRE	Oakland-Howell MetroEXpress	14	13	12	20	20
10	Humboldt - Wisconsin	18	21	15	31	32
15	Holton - Kinnickinnic	22	22	23	23	23
28	108th Street	35	29	29	54	
51	Oklahoma Avenue	25	22	19	27	27
52	Clement - 15th Avenue	42	45	45	59	84
53	Lincoln Avenue	21	28	15	26	27
55	Layton Avenue	29	32	33	46	43
56	Greenfield Avenue	27	25	29	35	45
64	S. 60th Street	41	40	42		
Group Average		27	28	29	36	38

Data is for Fall of 2013 service from 2013 MCTS Annual Ridership Statistics Book

2013 Title VI Route Evaluation

Saturday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM HW</u>	<u>MD HW</u>	<u>PM HW</u>	<u>EVE HW</u>	<u>LN HW</u>
Minority						
RED	Capitol Drive MetroEXpress	32	26	27	30	39
BLU	Fond du Lac - National MetroEXpress	40	49	49	47	
12	Teutonia-Hampton	30	22	18	17	34
14	Forest Home	36	32	30	35	33
19	ML King - S. 13th/S. 20th	19	18	19	18	25
21	North Avenue	17	18	19	24	30
22	Center Street	32	22	23	21	28
23	Fond du Lac - National	34	30	29	38	50
27	27th Street	17	15	14	14	25
30	Sherman - Wisconsin	13	12	12	17	17
31	State - Highland	41	29	26	31	45
33	Vliet Street	28	30	30	28	30
35	35th Street	31	25	22	24	30
54	Mitchell - Burnham	42	45	45	43	42
57	Walnut - Lisbon	46	33	33	30	30
60	Burleigh Street	44	31	23	22	21
62	Capitol Drive	29	23	22	31	30
63	Silver Spring - PT. Washington	35	26	24	23	29
67	N. 76th - S. 84th	60	34	33	33	65
76	N. 60th - S. 70th	26	20	21	28	28
80	6th Street	27	22	23	35	34
Group Average		32	27	26	28	33
Non-Minority						
GRE	Oakland-Howell MetroEXpress	26	21	19	19	25
10	Humboldt - Wisconsin	30	30	31	34	30
15	Holton - Kinnickinnic	33	35	33	42	52
28	108th Street		54	53		
51	Oklahoma Avenue	28	28	29	42	40
52	Clement - 15th Avenue	40	42	42	56	80
53	Lincoln Avenue	38	41	41	39	37
55	Layton Avenue	38	30	31	44	42
56	Greenfield Avenue	29	25	25	32	43
64	S. 60th Street		59	59		
Group Average		33	33	36	39	44

Data is for Fall of 2013 service from 2013 MCTS Annual Ridership Statistics Book

2013 Title VI Route Evaluation

Sunday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM_HW</u>	<u>MD_HW</u>	<u>PM_HW</u>	<u>EVE_HW</u>	<u>LN_HW</u>
Minority						
RED	Capitol Drive MetroEXpress	32	26	25	30	45
BLU	Fond du Lac - National MetroEXpress	40	39	37	47	
12	Teutonia-Hampton	25	23	17	17	33
14	Forest Home	33	29	29	33	33
19	ML King - S. 13th/S. 20th	25	19	19	19	34
21	North Avenue	28	20	20	24	30
22	Center Street	29	21	22	22	30
23	Fond du Lac-National	48	38	37	36	56
27	27th Street	21	16	17	20	26
30	Sherman - Wisconsin	24	20	14	15	26
31	State - Highland	39	25	25	50	
33	Vliet Street	26	29	29	27	25
35	35th Street	31	21	21	22	32
54	Mitchell - Burnham		44	46	42	
57	Walnut - Lisbon	41	32	32	30	35
60	Burleigh Street	43	31	23	22	21
62	Capitol Drive	32	32	31	30	29
63	Silver Spring - PT. Washington	31	25	26	34	40
67	N. 76th - S. 84th	60	31	33	34	61
76	N. 60th - S. 70th	39	29	25	34	31
80	6th Street	26	22	22	34	35
Group Average		34	27	26	30	35
Non-Minority						
GRE	Oakland-Howell MetroEXpress	32	24	25	25	35
10	Humboldt - Wisconsin	29	28	29	26	
15	Holton - Kinnickinnic	37	55	44	43	40
28	108th Street		54	54		
51	Oklahoma Avenue	24	28	28	38	39
52	Clement - 15th Avenue	42	41	42	58	82
53	Lincoln Avenue	36	39	40	38	37
54	Mitchell - Burnham		44	46	42	
55	Layton Avenue	43	44	46	42	
56	Greenfield Avenue	40	32	33	44	42
64	S. 60th Street		59	59		
Group Average		35	41	41	40	46

Data is for Fall of 2013 service from 2013 MCTS Annual Ridership Statistics Book

2013 MCTS System On-Time Performance Averaged by Day and Time

Month	Day	Percent on time at sample time shown			
		7:00 AM	12:00 PM	4:00 PM	9:00 PM
Jan	Weekday	94.89%	94.91%	91.29%	94.49%
	Saturday	94.46%	93.79%	89.13%	91.09%
	Sunday	92.96%	93.05%	91.61%	91.75%
Feb	Weekday	93.49%	94.43%	90.63%	92.70%
	Saturday	91.14%	92.21%	90.17%	91.43%
	Sunday	93.55%	93.76%	89.25%	86.89%
Mar	Weekday	95.76%	94.21%	95.43%	95.92%
	Saturday	93.13%	88.65%	89.15%	87.87%
	Sunday	90.59%	88.16%	95.02%	92.09%
Apr	Weekday	98.58%	97.58%	96.87%	96.65%
	Saturday	97.78%	97.67%	95.83%	95.63%
	Sunday	95.64%	97.34%	96.35%	94.26%
May	Weekday	98.02%	96.44%	94.84%	95.39%
	Saturday	92.05%	87.21%	93.36%	91.61%
	Sunday	96.27%	96.34%	94.59%	93.20%
Jun	Weekday	98.88%	97.15%	96.03%	96.20%
	Saturday	97.53%	96.81%	93.65%	91.34%
	Sunday	97.58%	96.67%	92.91%	93.95%
Jul	Weekday	98.09%	96.57%	95.78%	95.78%
	Saturday	94.32%	92.21%	90.40%	90.55%
	Sunday	92.01%	91.14%	86.05%	88.13%
Aug	Weekday	97.53%	95.26%	94.50%	94.50%
	Saturday	96.43%	97.28%	92.43%	90.95%
	Sunday	95.20%	94.15%	92.42%	92.75%
Sep	Weekday	97.64%	96.47%	92.19%	94.05%
	Saturday	95.96%	92.30%	96.05%	94.35%
	Sunday	95.69%	94.11%	94.68%	95.51%
Oct	Weekday	97.46%	96.50%	95.36%	96.84%
	Saturday	92.47%	89.79%	96.79%	95.71%
	Sunday	96.95%	95.93%	94.74%	94.77%
Nov	Weekday	97.05%	95.97%	96.08%	97.64%
	Saturday	97.99%	95.96%	95.78%	97.23%
	Sunday	93.97%	94.69%	97.49%	97.60%
Dec	Weekday	95.92%	95.59%	96.27%	95.75%
	Saturday	90.11%	90.16%	92.88%	93.29%
	Sunday	92.11%	90.07%	97.32%	92.75%
2013 Average	Weekday	96.94%	95.92%	94.61%	95.49%
	Saturday	94.45%	92.84%	92.97%	92.59%
	Sunday	94.38%	93.78%	93.54%	92.80%

2013 Title VI Route Evaluation Weekday Bus Hours and PBH

<u>Rt</u>	<u>Name</u>	<u>Type of Route</u>	<u>Bus Hours</u>	<u>Passengers per bus hour</u>
Minority				
RED	Capitol Drive MetroEXpress	Regular	113	40
BLU	Fond du Lac - National MetroEXpress	Regular	160	49
12	Teutonia - Hampton	Regular	187	52
14	Forest Home	Regular	102	33
19	King - S. 13th/S. 20th	Regular	209	38
21	North Avenue	Regular	137	58
22	Center Street	Regular	74	55
23	Fond du Lac-National	Regular	173	39
27	27th Street	Regular	227	58
30	Sherman - Wisconsin	Regular	284	52
31	State - Highland	Regular	90	23
33	Vliet Street	Regular	39	21
35	35th Street	Regular	100	53
63	Silver Spring-Pt. Washington	Regular	70	54
54	Mitchell - Burnham	Regular	73	39
57	Walnut - Lisbon	Regular	73	25
60	Burleigh Street	Regular	92	45
62	Capitol Drive	Regular	69	41
67	N. 76th - S. 84th	Regular	123	39
76	N. 60th - S. 70th	Regular	172	33
80	6th Street	Regular	192	39
Group Average:			131	42
Non-Minority				
GRN	Oakland-Howell MetroEXpress	Regular	208	36
10	Humboldt - Wisconsin	Regular	177	35
15	Holton - Kinnickinnic	Regular	156	31
28	108th Street	Regular	43	19
51	Oklahoma Avenue	Regular	75	36
52	Clement-15th Ave.	Regular	33	14
53	Lincoln Avenue	Regular	65	41
55	Layton Avenue	Regular	45	29
56	Greenfield Avenue	Regular	76	27
64	S. 60th Street	Regular	27	15
Group Average:			91	28

Data is for Fall of 2013 service from 2013 MCTS Annual Ridership Statistics Book

**2013 Title VI Route Evaluation
Average Hours of the Day Served on Weekdays**

<u>Rt</u>	<u>Name</u>	<u>Type of Route</u>	<u>Hours of Day Served</u>
Minority			
RED	Capitol Drive MetroExpress	Regular	21
BLU	Fond du Lac - National MetroExpress	Regular	23
12	Teutonia - Hampton	Regular	21
14	Forest Home	Regular	22
19	M.L. King - S. 13th/S. 20th	Regular	22
21	North Avenue	Regular	22
22	Center Street	Regular	21
23	Fond du Lac - National	Regular	24
27	27th Street	Regular	22
30	Sherman - Wisconsin	Regular	22
31	State- Highland	Regular	19
33	Vliet Street	Regular	20
35	35th Street	Regular	22
54	Mitchell - Burnham	Regular	22
57	Walnut - N. 92nd	Regular	21
60	Burleigh Street	Regular	21
62	Capitol Drive	Regular	20
63	Silver Spring - Port Washington	Regular	21
67	N. 76th - S. 84th	Regular	21
76	N. 60th - S. 70th	Regular	22
80	6th Street	Regular	22
Group Average:			21
Non-Minority			
GRE	Oakland-Howell MetroExpress	Regular	24
10	Humboldt - Wisconsin	Regular	22
15	Holton - Kinnickinnic	Regular	24
28	108th Street	Regular	17
51	Oklahoma Avenue	Regular	21
52	Clement - 15th Avenue	Regular	20
53	Lincoln Avenue	Regular	21
55	Layton Avenue	Regular	17
56	Greenfield Avenue	Regular	22
64	S. 60th Street	Regular	14
Group Average:			20

Hours of day Served = Time of last pull in subtracted from time of first pull out
Data is from Fall of 2013 HASTUS Vehicle Schedule Overview

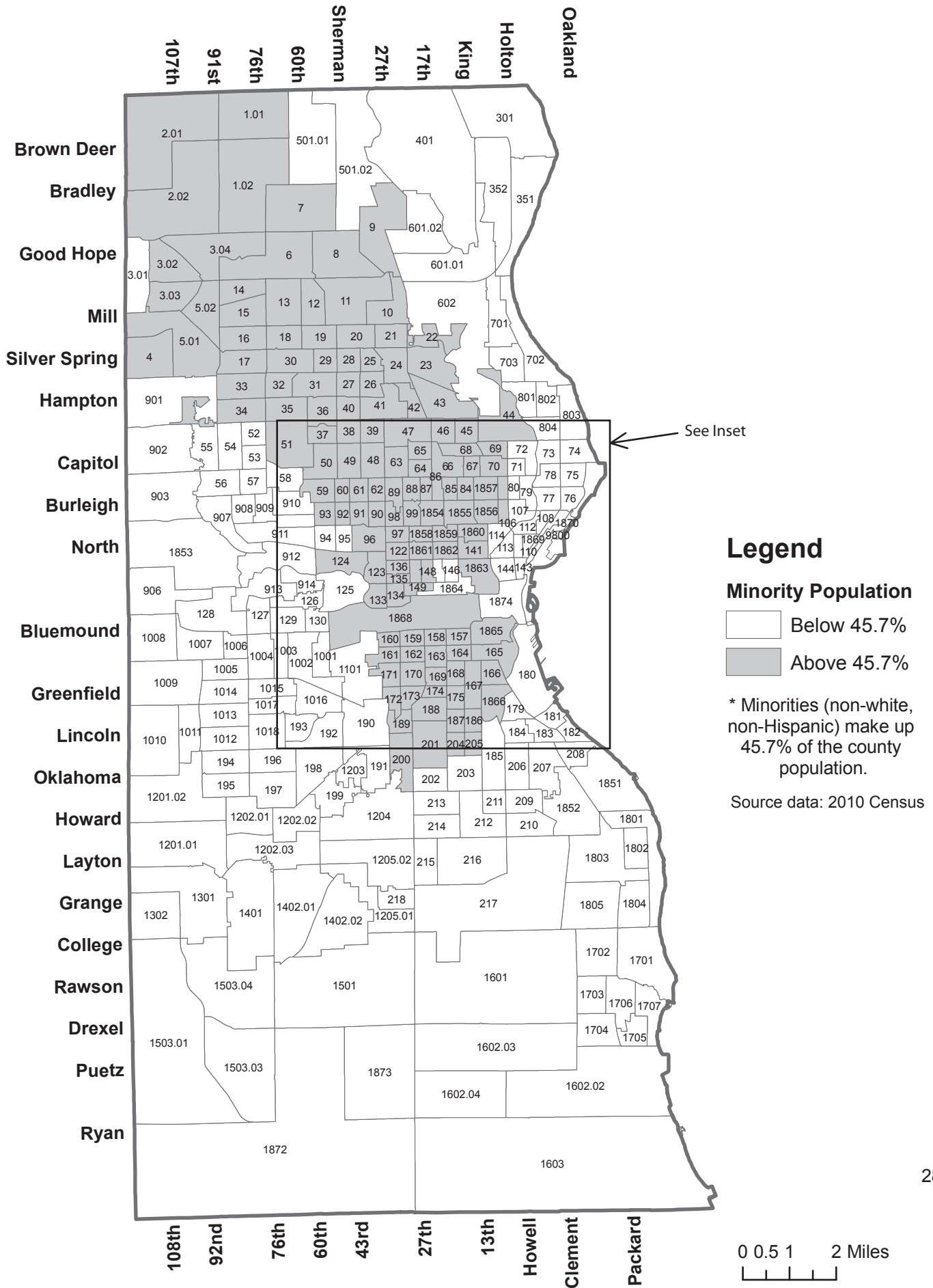
BUS DISTRIBUTION AND COUNT AS OF APRIL 30, 2014

	2002 New Flyer	2002 Gillig	2003 New Flyer	2004 New Flyer	2005 New Flyer	2006 New Flyer	2010 New Flyer	2011 New Flyer	2012 New Flyer	2013 New Flyer
Fond du Lac Garage	4606, 4615, 4616, 4619, 4621, 4622, 4628, 4631, 4639,		4700-4714			5000-5007	5100-5123		5300-5354	
146	9	0	15	0	0	8	24	0	55	0
Fiebrantz MCTS Buses 104 Oz Buses <u>5</u> 109		1000-1004	4715-4728	4800-4829				5200-5234		5430-5454
	0	5	14	30	0	0	0	35		25
Kinnickinnic Garage	4600-4638		4729-4750		4900-4914		5124-5189			5400-5429
148	15	0	22	0	15	0	66	0		30
Active Buses 403	24	5	51	30	15	8	90	35	55	55
MCTS Buses 398										

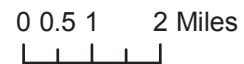
<u>Active Vehicles</u>	<u>Count</u>	<u>Length/Seats</u>
2000	0	40' / 39
2001	0	40' / 39
2002	24	40' / 39
1000-1005	5	40' / 37
4700-4750	51	40' / 39
4800-4829	30	40' / 39
4900-4914	15	40' / 39
5000-5007	8	40' / 39
5100-5169	90	40' / 39
5200-5234	35	40' / 39
5300-5354	55	40' / 39
5400-5454	55	40' / 39
5500-5534	35	40' / 35

<u>(Inactive)</u>	
Group 19:	37
Out of Service Buses:	37
Active MCTS 40' Buses:	398
Active Ozaukee 40' Buses:	<u>5</u>
Total Active Buses:	403
Out of Service Buses:	37
Contingency Fleet:	0
Grand Total:	440

Minority Population by Census Tract Compared to Milwaukee County Minority Population

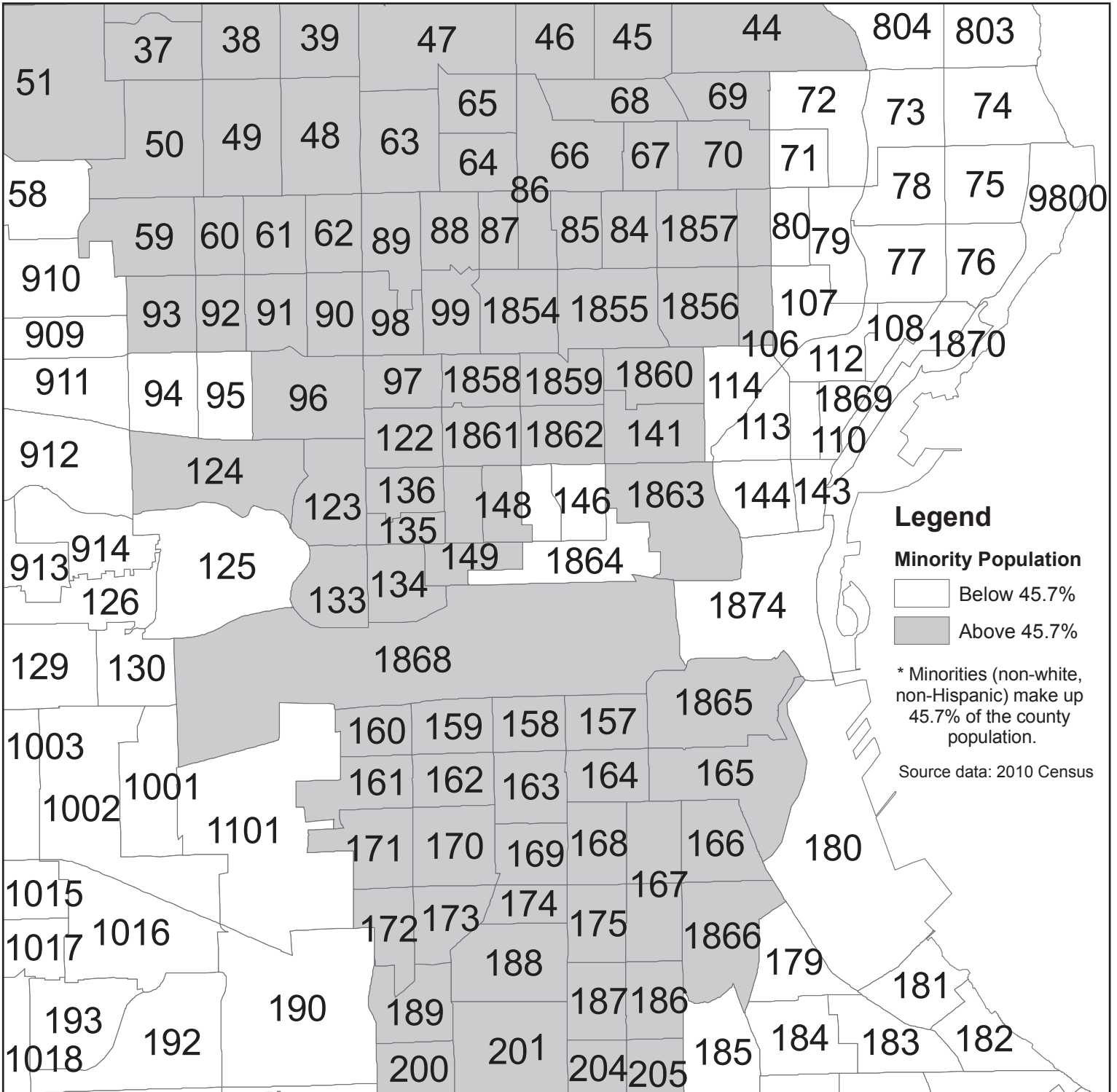


28 July 2011



Map Inset

Minority Population by Census Tract Compared to Milwaukee County Minority Population



Legend

Minority Population

- Below 45.7%
- Above 45.7%

* Minorities (non-white, non-Hispanic) make up 45.7% of the county population.

Source data: 2010 Census

Milwaukee County Population and Race Distribution Chart 2010

Census Tract	2010 Population	White	Black		American Indian and Alaska Native		Asian		Native Hawaiian and Pacific Islander		Other		Multiracial		Hispanic or Latino		Total Minority
			#	%	#	%	#	%	#	%	#	%	#	%	#	%	
101	4822	1415	3014	62.5	15	0.3	176	3.6	2	0	48	1	152	3.2	164	3.4	72.0
102	3507	1142	2131	60.8	21	0.6	81	2.3	3	0.1	48	1.4	81	2.3	121	3.5	68.8
201	5450	1291	3185	58.4	16	0.3	163	3	0	0	569	10.4	226	4.1	840	15.4	79.8
202	6101	2449	3051	50	50	0.8	279	4.6	8	0.1	56	0.9	208	3.4	253	4.1	62.1
301	1483	1254	154	10.4	4	0.3	26	1.8	2	0.1	5	0.3	38	2.6	38	2.6	17.1
302	3028	388	2426	80.1	4	0.1	55	1.8	1	0	51	1.7	103	3.4	128	4.2	87.9
303	1873	906	695	37.1	8	0.4	96	5.1	1	0.1	39	2.1	128	6.8	104	5.6	53.3
304	3382	1389	1517	44.9	12	0.4	285	8.4	1	0	40	1.2	138	4.1	133	3.9	60.8
400	2439	889	1314	53.9	18	0.7	46	1.9	4	0.2	62	2.5	106	4.3	140	5.7	65.6
502	4878	816	3586	73.5	27	0.6	182	3.7	2	0	60	1.2	205	4.2	188	3.9	84.6
504	3450	1687	1377	39.9	23	0.7	142	4.1	4	0.1	62	1.8	155	4.5	191	5.5	54.0
600	6290	1826	3404	54.1	16	0.3	776	12.3	1	0	68	1.1	199	3.2	198	3.1	72.1
700	3580	1185	2133	59.6	19	0.5	89	2.5	0	0	43	1.2	111	3.1	107	3	68.1
800	5129	1290	3228	62.9	26	0.5	274	5.3	2	0	84	1.6	225	4.4	209	4.1	76.1
900	3694	699	2779	75.2	16	0.4	57	1.5	0	0	17	0.5	126	3.4	119	3.2	82.3
1000	3654	663	2716	74.3	28	0.8	68	1.9	0	0	40	1.1	139	3.8	149	4.1	83.1
1100	2800	327	2336	83.4	14	0.5	11	0.4	0	0	34	1.2	78	2.8	66	2.4	88.7
1200	2985	212	2022	67.7	8	0.3	652	21.8	10	0.3	18	0.6	63	2.1	47	1.6	93.4
1300	3733	621	2551	68.3	15	0.4	388	10.4	0	0	47	1.3	111	3	170	4.6	85.1
1400	2595	391	1463	56.4	8	0.3	593	22.9	0	0	20	0.8	120	4.6	83	3.2	85.7
1500	3173	489	1940	61.1	8	0.3	631	19.9	0	0	39	1.2	66	2.1	109	3.4	85.8
1600	2990	526	2137	71.5	14	0.5	158	5.3	0	0	41	1.4	114	3.8	124	4.1	84.2
1700	4458	1087	2893	64.9	18	0.4	252	5.7	2	0	43	1	163	3.7	125	2.8	76.7
1800	3153	471	2492	79	10	0.3	81	2.6	0	0	23	0.7	76	2.4	103	3.3	86.1
1900	3518	530	2631	74.8	14	0.4	197	5.6	0	0	51	1.4	95	2.7	121	3.4	86.3
2000	2470	325	2038	82.5	11	0.4	1	0	1	0	26	1.1	68	2.8	91	3.7	88.5
2100	2474	222	2144	86.7	10	0.4	7	0.3	0	0	28	1.1	63	2.5	108	4.4	92.3
2200	1790	643	1014	56.6	7	0.4	19	1.1	0	0	27	1.5	80	4.5	93	5.2	66.2
2300	4406	187	4050	91.9	8	0.2	3	0.1	1	0	35	0.8	122	2.8	128	2.9	96.4
2400	2244	98	2053	91.5	2	0.1	27	1.2	0	0	17	0.8	47	2.1	48	2.1	96.1
2500	2195	148	1949	88.8	11	0.5	3	0.1	6	0.3	38	1.7	40	1.8	91	4.1	94.2
2600	2829	186	2500	88.4	19	0.7	22	0.8	0	0	24	0.8	78	2.8	78	2.8	94.2
2700	1995	203	1681	84.3	15	0.8	22	1.1	1	0.1	29	1.5	44	2.2	57	2.9	90.3
2800	2252	197	1878	83.4	9	0.4	59	2.6	1	0	36	1.6	72	3.2	71	3.2	92.0
2900	2179	306	1664	76.4	14	0.6	101	4.6	1	0	45	2.1	48	2.2	115	5.3	88.3
3000	3782	739	2649	70	23	0.6	195	5.2	0	0	47	1.2	129	3.4	168	4.4	81.8
3100	3572	446	2639	73.9	19	0.5	315	8.8	0	0	43	1.2	110	3.1	132	3.7	88.9
3200	2819	457	1913	67.9	7	0.2	344	12.2	0	0	23	0.8	75	2.7	80	2.8	84.5
3300	5182	1279	3234	62.4	19	0.4	351	6.8	0	0	62	1.2	237	4.6	198	3.8	76.7
3400	5533	2229	2718	49.1	44	0.8	233	4.2	4	0.1	53	1	252	4.6	206	3.7	61.6
3500	3410	540	2525	74	6	0.2	155	4.5	1	0	71	2.1	112	3.3	166	4.9	85.4
3600	1893	216	1547	81.7	7	0.4	30	1.6	0	0	36	1.9	57	3	71	3.8	89.8
3700	2315	411	1786	77.1	7	0.3	23	1	0	0	18	0.8	70	3	79	3.4	83.1
3800	2196	177	1948	88.7	2	0.1	5	0.2	0	0	15	0.7	49	2.2	65	3	93.0
3900	2630	107	2403	91.4	7	0.3	23	0.9	0	0	19	0.7	71	2.7	56	2.1	96.5
4000	2662	121	2428	91.2	6	0.2	8	0.3	0	0	18	0.7	81	3	51	1.9	95.6
4100	2565	132	2358	91.9	4	0.2	17	0.7	0	0	18	0.7	36	1.4	58	2.3	95.8
4200	3047	94	2835	93	13	0.4	4	0.1	1	0	14	0.5	86	2.8	76	2.5	97.4
4300	5349	143	5049	94.4	8	0.1	7	0.1	0	0	58	1.1	84	1.6	138	2.6	97.7
4400	3333	725	2365	71	14	0.4	94	2.8	0	0	82	2.5	53	1.6	147	4.4	79.6
4500	2478	60	2308	93.1	5	0.2	18	0.7	5	0.2	15	0.6	67	2.7	87	3.5	98.2
4600	2984	28	2841	95.2	18	0.6	30	1	0	0	12	0.4	55	1.8	60	2	99.3

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			#	%	#	%	#	%	#	%	#	%	#	%	#	%	
4700	4021	73	3827	95.2	8	0.2	11	0.3	0	0	20	0.5	82	2	70	1.7	98.3
4800	4002	140	3684	92.1	11	0.3	40	1	0	0	40	1	87	2.2	106	2.6	97.1
4900	4506	756	3551	78.8	17	0.4	36	0.8	0	0	44	1	102	2.3	148	3.3	84.2
5000	4707	1414	3017	64.1	21	0.4	41	0.9	0	0	64	1.4	150	3.2	210	4.5	71.6
5100	3401	712	2424	71.3	11	0.3	106	3.1	1	0	42	1.2	105	3.1	128	3.8	80.5
5200	1657	962	496	29.9	12	0.7	109	6.6	0	0	27	1.6	51	3.1	76	4.6	43.8
5300	1920	1318	413	21.5	14	0.7	33	1.7	3	0.2	42	2.2	97	5.1	106	5.5	34.0
5400	3690	2797	638	17.3	12	0.3	91	2.5	1	0	44	1.2	107	2.9	196	5.3	27.3
5500	3318	2824	290	8.7	21	0.6	71	2.1	1	0	47	1.4	64	1.9	137	4.1	17.2
5600	2198	1945	114	5.2	11	0.5	49	2.2	5	0.2	20	0.9	54	2.5	62	2.8	13.2
5700	2371	1886	361	15.2	6	0.3	36	1.5	0	0	13	0.5	69	2.9	79	3.3	22.9
5800	3430	2278	915	26.7	12	0.3	31	0.9	3	0.1	36	1	155	4.5	161	4.7	36.4
5900	3614	971	2280	63.1	31	0.9	115	3.2	0	0	68	1.9	149	4.1	205	5.7	75.0
6000	2658	200	2320	87.3	4	0.2	33	1.2	2	0.1	19	0.7	80	3	78	2.9	93.3
6100	2320	206	1955	84.3	13	0.6	36	1.6	0	0	31	1.3	79	3.4	76	3.3	92.0
6200	2923	87	2749	94	13	0.4	24	0.8	0	0	13	0.4	37	1.3	73	2.5	97.6
6300	2462	49	2273	92.3	4	0.2	34	1.4	0	0	24	1	78	3.2	56	2.3	98.3
6400	2510	37	2395	95.4	9	0.4	12	0.5	0	0	13	0.5	44	1.8	29	1.2	98.8
6500	2628	25	2519	95.9	9	0.3	8	0.3	1	0	22	0.8	44	1.7	55	2.1	99.2
6600	3053	33	2906	95.2	7	0.2	1	0	0	0	37	1.2	69	2.3	78	2.6	99.3
6700	1492	16	1435	96.2	2	0.1	1	0.1	0	0	1	0.1	37	2.5	25	1.7	99.3
6800	2813	93	2652	94.3	7	0.2	4	0.1	1	0	24	0.9	32	1.1	56	2	97.2
6900	2585	181	2167	83.8	14	0.5	11	0.4	0	0	108	4.2	104	4	274	10.6	95.9
7000	3020	201	2528	83.7	16	0.5	4	0.1	1	0	126	4.2	144	4.8	280	9.3	95.9
7100	1912	1386	304	15.9	29	1.5	13	0.7	0	0	91	4.8	89	4.7	269	14.1	34.6
7200	2791	1884	583	20.9	21	0.8	26	0.9	0	0	124	4.4	153	5.5	341	12.2	38.1
7300	2477	2220	57	2.3	17	0.7	116	4.7	1	0	18	0.7	48	1.9	84	3.4	12.6
7400	4122	3770	137	3.3	9	0.2	75	1.8	1	0	56	1.4	74	1.8	171	4.1	11.4
7500	2706	2513	56	2.1	2	0.1	63	2.3	0	0	19	0.7	53	2	64	2.4	9.2
7600	3275	3017	90	2.7	5	0.2	107	3.3	1	0	8	0.2	47	1.4	69	2.1	9.5
7700	3807	3223	189	5	14	0.4	228	6	4	0.1	39	1	110	2.9	135	3.5	17.3
7800	3446	3186	71	2.1	6	0.2	85	2.5	1	0	21	0.6	76	2.2	106	3.1	9.8
7900	2224	1811	214	9.6	9	0.4	40	1.8	0	0	76	3.4	74	3.3	168	7.6	22.6
8000	1951	1306	340	17.4	28	1.4	23	1.2	2	0.1	161	8.3	91	4.7	361	18.5	41.0
8100	1331	220	951	71.5	9	0.7	1	0.1	0	0	96	7.2	54	4.1	235	17.7	90.8
8400	1315	11	1240	94.3	2	0.2	14	1.1	0	0	14	1.1	34	2.6	34	2.6	99.7
8500	1309	15	1249	95.4	4	0.3	12	0.9	0	0	13	1	16	1.2	17	1.3	98.9
8600	1500	9	1444	96.3	4	0.3	2	0.1	0	0	4	0.3	37	2.5	29	1.9	99.7
8700	1410	28	1342	95.2	0	0	0	0	0	0	11	0.8	29	2.1	28	2	98.2
8800	2121	44	2005	94.5	13	0.6	13	0.6	0	0	4	0.2	42	2	55	2.6	98.9
8900	1462	72	1334	91.2	1	0.1	16	1.1	2	0.1	29	2	8	0.5	80	5.5	96.2
9000	2544	60	2315	91	12	0.5	106	4.2	0	0	15	0.6	36	1.4	79	3.1	98.5
9100	2425	166	2044	84.3	11	0.5	70	2.9	0	0	30	1.2	104	4.3	81	3.3	94.2
9200	1901	413	1324	69.6	10	0.5	60	3.2	0	0	19	1	75	3.9	112	5.9	80.0
9300	2535	1400	928	36.6	18	0.7	48	1.9	0	0	32	1.3	109	4.3	138	5.4	47.4
9400	2423	1969	289	11.9	22	0.9	41	1.7	2	0.1	32	1.3	68	2.8	166	6.9	22.8
9500	2121	1533	442	20.8	7	0.3	27	1.3	0	0	7	0.3	105	5	99	4.7	30.7
9600	2317	141	1777	76.7	13	0.6	255	11	1	0	40	1.7	90	3.9	113	4.9	95.7
9700	1939	90	978	50.4	2	0.1	804	41.5	0	0	19	1	46	2.4	24	1.2	95.7
9800	1433	47	1165	81.3	3	0.2	170	11.9	0	0	6	0.4	42	2.9	51	3.6	97.1
9900	1458	80	1299	89.1	10	0.7	22	1.5	0	0	16	1.1	31	2.1	60	4.1	96.4
10600	1192	351	674	56.5	6	0.5	14	1.2	0	0	84	7	63	5.3	167	14	74.8

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			#	%	#	%	#	%	#	%	#	%	#	%	#	%		
10700	2208	1500	464	21	9	0.4	38	1.7	0	0	97	4.4	100	4.5	268	12.1	37.3	
10800	2469	2092	154	6.2	10	0.4	100	4.1	3	0.1	38	1.5	72	2.9	128	5.2	18.1	
11000	3428	2711	443	12.9	39	1.1	125	3.6	1	0	39	1.1	70	2	147	4.3	23.6	
11100	1481	1269	84	5.7	4	0.3	65	4.4	4	0.3	24	1.6	31	2.1	76	5.1	17.4	
11200	2219	1775	263	11.9	12	0.5	54	2.4	1	0	40	1.8	74	3.3	124	5.6	22.9	
11300	1829	1571	130	7.1	8	0.4	68	3.7	0	0	16	0.9	36	2	74	4	16.8	
11400	1137	902	141	12.4	6	0.5	41	3.6	0	0	17	1.5	30	2.6	64	5.6	23.9	
12200	2557	285	1234	48.3	10	0.4	822	32.1	0	0	124	4.8	82	3.2	242	9.5	91.1	
12300	1122	167	771	68.7	6	0.5	85	7.6	0	0	43	3.8	50	4.5	84	7.5	88.1	
12400	2592	1332	804	31	35	1.4	184	7.1	0	0	95	3.7	142	5.5	218	8.4	51.3	
12500	2014	1720	156	7.7	16	0.8	48	2.4	1	0	21	1	52	2.6	91	4.5	17.5	
12600	2169	1876	115	5.3	10	0.5	32	1.5	1	0	51	2.4	84	3.9	198	9.1	19.2	
12700	1189	1081	32	2.7	15	1.3	14	1.2	0	0	31	2.6	16	1.3	87	7.3	13.4	
12800	2958	2432	193	6.5	14	0.5	136	4.6	0	0	109	3.7	74	2.5	252	8.5	21.1	
12900	2942	2345	188	6.4	50	1.7	36	1.2	0	0	173	5.9	150	5.1	424	14.4	26.9	
13000	1800	1401	133	7.4	23	1.3	22	1.2	1	0.1	132	7.3	88	4.9	317	17.6	30.8	
13300	1066	484	304	28.5	16	1.5	111	10.4	0	0	76	7.1	75	7	166	15.6	58.8	
13400	2335	303	1611	69	14	0.6	170	7.3	3	0.1	137	5.9	97	4.2	273	11.7	90.2	
13500	1911	298	1455	76.1	21	1.1	3	0.2	0	0	71	3.7	63	3.3	135	7.1	86.1	
13600	2489	482	1741	69.9	26	1	39	1.6	0	0	117	4.7	84	3.4	246	9.9	83.2	
13700	1578	186	1118	70.8	16	1	100	6.3	0	0	101	6.4	57	3.6	153	9.7	90.4	
14100	1551	221	1253	80.8	7	0.5	7	0.5	0	0	40	2.6	23	1.5	101	6.5	86.8	
14300	2297	2005	103	4.5	4	0.2	126	5.5	1	0	16	0.7	42	1.8	91	4	15.7	
14400	2612	2125	110	4.2	5	0.2	284	10.9	1	0	34	1.3	53	2	108	4.1	21.2	
14600	3946	2869	781	19.8	10	0.3	205	5.2	1	0	43	1.1	37	0.9	178	4.5	29.9	
14700	3291	2179	813	24.7	9	0.3	177	5.4	2	0.1	55	1.7	56	1.7	180	5.5	36.6	
14800	2403	1258	837	34.8	6	0.2	172	7.2	5	0.2	46	1.9	79	3.3	129	5.4	49.8	
14900	1483	589	555	37.4	8	0.5	132	8.9	2	0.1	135	9.1	62	4.2	256	17.3	66.1	
15700	3231	1644	437	13.5	19	0.6	32	1	0	0	974	30.1	125	3.9	2414	74.7	89.4	
15800	3058	1487	469	15.3	48	1.6	108	3.5	2	0.1	800	26.2	144	4.7	2080	68	86.6	
15900	3819	1808	416	10.9	86	2.3	170	4.5	1	0	1110	29.1	228	6	2410	63.1	80.6	
16000	3310	1498	291	8.8	94	2.8	227	6.9	0	0	978	29.5	222	6.7	2060	62.2	80.6	
16100	3574	1754	195	5.5	86	2.4	97	2.7	0	0	1234	34.5	208	5.8	2503	70	79.5	
16200	3366	1601	264	7.8	57	1.7	148	4.4	5	0.1	1136	33.7	155	4.6	2243	66.6	80.4	
16300	5124	1964	642	12.5	79	1.5	85	1.7	14	0.3	2097	40.9	243	4.7	3740	73	88.0	
16400	4948	2221	597	12.1	64	1.3	104	2.1	2	0	1720	34.8	240	4.9	3820	77.2	90.8	
16500	2695	1174	276	10.2	64	2.4	82	3	0	0	934	34.7	165	6.1	2044	75.8	90.8	
16600	2313	1058	472	20.4	45	1.9	11	0.5	0	0	605	26.2	122	5.3	1397	60.4	81.7	
16700	3355	1501	365	10.9	81	2.4	27	0.8	0	0	1227	36.6	154	4.6	2552	76.1	88.3	
16800	3450	1617	411	11.9	36	1	89	2.6	5	0.1	1109	32.1	183	5.3	2569	74.5	88.8	
16900	4130	1970	386	9.3	67	1.6	39	0.9	0	0	1456	35.3	212	5.1	3090	74.8	86.1	
17000	6112	2953	391	6.4	138	2.3	163	2.7	1	0	2140	35	326	5.3	4246	69.5	80.3	
17100	2937	1477	83	2.8	40	1.4	99	3.4	0	0	1110	37.8	128	4.4	2178	74.2	81.3	
17200	2509	1363	85	3.4	39	1.6	52	2.1	0	0	839	33.4	131	5.2	1794	71.5	78.4	
17300	3894	1914	170	4.4	105	2.7	101	2.6	4	0.1	1403	36	197	5.1	2827	72.6	81.5	
17400	2953	1313	321	10.9	32	1.1	48	1.6	0	0	1076	36.4	163	5.5	2053	69.5	82.4	
17500	4185	1834	335	8	83	2	83	2	0	0	1591	38	259	6.2	3069	73.3	85.8	
17600	3195	1469	190	5.9	70	2.2	102	3.2	2	0.1	1192	37.3	170	5.3	2362	73.9	84.1	
17900	3003	2322	143	4.8	58	1.9	64	2.1	2	0.1	239	8	175	5.8	619	20.6	32.1	
18000	2749	2372	100	3.6	47	1.7	25	0.9	1	0	103	3.7	101	3.7	347	12.6	21.0	
18100	1637	1506	24	1.5	12	0.7	20	1.2	1	0.1	38	2.3	36	2.2	115	7	12.3	
18200	1608	1507	23	1.4	3	0.2	14	0.9	1	0.1	22	1.4	38	2.4	93	5.8	10.0	

Milwaukee County Population and Race Distribution Chart 2010

Census Tract	2010 Population	White	Black		American Indian and Alaska Native		Asian		Native Hawaiian and Pacific Islander		Other		Multiracial		Hispanic or Latino		Total Minority
			#	%	#	%	#	%	#	%	#	%	#	%	#	%	
18300	2344	2040	61	2.6	39	1.7	19	0.8	3	0.1	95	4.1	87	3.7	251	10.7	17.9
18400	1404	1229	34	2.4	9	0.6	7	0.5	0	0	74	5.3	51	3.6	218	15.5	21.5
18500	1633	1414	18	1.1	24	1.5	16	1	0	0	109	6.7	52	3.2	282	17.3	21.8
18600	3000	1447	244	8.1	53	1.8	29	1	0	0	1014	33.8	213	7.1	2066	68.9	79.3
18700	3876	2009	296	7.6	75	1.9	46	1.2	2	0.1	1253	32.3	195	5	2827	72.9	81.8
18800	2066	1037	128	6.2	39	1.9	48	2.3	0	0	735	35.6	79	3.8	1570	76	85.3
18900	1635	983	112	6.9	23	1.4	47	2.9	0	0	390	23.9	80	4.9	812	49.7	59.9
19000	4545	3636	230	5.1	60	1.3	100	2.2	0	0	364	8	155	3.4	946	20.8	30.0
19100	3584	2714	251	7	35	1	156	4.4	5	0.1	276	7.7	147	4.1	780	21.8	36.1
19200	3186	2725	106	3.3	30	0.9	46	1.4	0	0	183	5.7	96	3	474	14.9	22.3
19300	2557	2339	35	1.4	15	0.6	31	1.2	1	0	77	3	59	2.3	289	11.3	15.8
19400	3732	3293	143	3.8	35	0.9	74	2	4	0.1	89	2.4	94	2.5	434	11.6	19.4
19500	3350	2995	65	1.9	39	1.2	41	1.2	0	0	114	3.4	96	2.9	332	9.9	16.0
19600	3616	3189	131	3.6	21	0.6	65	1.8	0	0	115	3.2	95	2.6	351	9.7	16.8
19700	5344	4509	180	3.4	61	1.1	180	3.4	2	0	219	4.1	193	3.6	651	12.2	22.0
19800	4913	4258	154	3.1	60	1.2	70	1.4	0	0	212	4.3	159	3.2	689	14	21.4
19900	3479	3047	76	2.2	41	1.2	81	2.3	4	0.1	148	4.3	82	2.4	555	16	22.4
20000	3411	2200	274	8	38	1.1	274	8	0	0	474	13.9	151	4.4	1179	34.6	53.3
20100	3529	2167	361	10.2	66	1.9	41	1.2	0	0	738	20.9	156	4.4	1581	44.8	57.8
20200	3024	2239	93	3.1	42	1.4	93	3.1	0	0	445	14.7	112	3.7	1084	35.8	44.1
20300	3773	2843	58	1.5	31	0.8	57	1.5	0	0	677	17.9	107	2.8	1492	39.5	44.3
20400	3216	1815	152	4.7	36	1.1	54	1.7	5	0.2	990	30.8	164	5.1	2061	64.1	71.4
20500	2921	1771	73	2.5	51	1.7	29	1	2	0.1	871	29.8	124	4.2	1802	61.7	66.3
20600	3525	3065	66	1.9	69	2	49	1.4	1	0	160	4.5	115	3.3	509	14.4	21.5
20700	4311	3885	93	2.2	42	1	50	1.2	2	0	124	2.9	115	2.7	457	10.6	16.1
20800	3009	2776	26	0.9	30	1	40	1.3	0	0	53	1.8	84	2.8	209	6.9	12.0
20900	2553	2304	44	1.7	12	0.5	36	1.4	0	0	73	2.9	84	3.3	320	12.5	17.8
21000	2189	1954	41	1.9	13	0.6	39	1.8	0	0	75	3.4	67	3.1	341	15.6	21.4
21100	1364	1234	16	1.2	19	1.4	3	0.2	1	0.1	62	4.5	29	2.1	185	13.6	17.2
21200	2097	1758	46	2.2	19	0.9	97	4.6	0	0	100	4.8	77	3.7	323	15.4	25.3
21300	1631	1267	121	7.4	25	1.5	14	0.9	0	0	154	9.4	50	3.1	387	23.7	34.5
21400	3288	2249	209	6.4	40	1.2	259	7.9	2	0.1	375	11.4	154	4.7	916	27.9	44.9
21500	2824	2407	34	1.2	23	0.8	150	5.3	6	0.2	115	4.1	89	3.2	439	15.5	25.4
21600	4365	3425	142	3.3	36	0.8	374	8.6	3	0.1	175	4	210	4.8	709	16.2	31.8
21700	6142	5332	140	2.3	57	0.9	245	4	4	0.1	185	3	179	2.9	890	14.5	23.3
21800	2223	1911	83	3.7	19	0.9	55	2.5	1	0	97	4.4	57	2.6	332	14.9	23.1
30100	4300	3896	147	3.4	13	0.3	159	3.7	3	0.1	20	0.5	62	1.4	121	2.8	11.6
35100	2257	2149	16	0.7	4	0.2	55	2.4	0	0	5	0.2	28	1.2	37	1.6	6.4
35200	4435	3979	172	3.9	4	0.1	187	4.2	0	0	24	0.5	69	1.6	125	2.8	12.4
40100	1597	1314	100	6.3	4	0.3	120	7.5	0	0	16	1	43	2.7	66	4.1	20.0
50101	5990	3931	1409	23.5	30	0.5	342	5.7	6	0.1	81	1.4	191	3.2	244	4.1	36.6
50102	6009	3499	2022	33.6	12	0.2	242	4	1	0	48	0.8	185	3.1	227	3.8	43.9
60101	4038	3205	542	13.4	10	0.2	151	3.7	3	0.1	28	0.7	99	2.5	148	3.7	23.1
60102	3138	2620	330	10.5	6	0.2	110	3.5	4	0.1	19	0.6	49	1.6	81	2.6	18.4
60200	5705	4399	941	16.5	16	0.3	154	2.7	3	0.1	47	0.8	145	2.5	236	4.1	25.6
70100	4373	4127	43	1	5	0.1	99	2.3	0	0	27	0.6	72	1.6	148	3.4	8.4
70200	5172	4905	41	0.8	10	0.2	123	2.4	0	0	21	0.4	72	1.4	106	2	6.8
70300	4541	3923	186	4.1	4	0.1	291	6.4	0	0	17	0.4	120	2.6	145	3.2	16.1
80100	2680	2301	101	3.8	8	0.3	178	6.6	1	0	20	0.7	71	2.6	87	3.2	16.3
80200	3368	2962	94	2.8	9	0.3	176	5.2	0	0	26	0.8	101	3	144	4.3	15.0
80300	3884	3551	70	1.8	4	0.1	151	3.9	1	0	28	0.7	79	2	117	3	10.6
80400	3254	2805	119	3.7	10	0.3	238	7.3	0	0	27	0.8	55	1.7	99	3	15.9

Milwaukee County Population and Race Distribution Chart 2010

Census Tract	2010 Population	White	Black		American Indian and Alaska Native		Asian		Native Hawaiian and Pacific Islander		Other		Multiracial		Hispanic or Latino		Total Minority
			#	%	#	%	#	%	#	%	#	%	#	%	#	%	
90100	4558	3761	478	10.5	15	0.3	161	3.5	0	0	39	0.9	104	2.3	144	3.2	19.6
90200	1800	1622	91	5.1	2	0.1	49	2.7	0	0	3	0.2	33	1.8	38	2.1	11.8
90300	3297	2652	261	7.9	23	0.7	221	6.7	3	0.1	32	1	105	3.2	134	4.1	22.2
90600	4642	4185	157	3.4	18	0.4	129	2.8	8	0.2	51	1.1	94	2	188	4	12.6
90700	3159	3052	24	0.8	1	0	33	1	3	0.1	9	0.3	37	1.2	40	1.3	4.2
90800	2363	2189	60	2.5	2	0.1	46	1.9	5	0.2	7	0.3	54	2.3	56	2.4	9.0
90900	3837	3290	214	5.6	14	0.4	154	4	2	0.1	28	0.7	135	3.5	142	3.7	16.4
91000	4438	3913	319	7.2	6	0.1	53	1.2	1	0	29	0.7	117	2.6	190	4.3	14.8
91100	4250	4054	56	1.3	4	0.1	52	1.2	2	0	7	0.2	75	1.8	94	2.2	6.5
91200	4699	4236	156	3.3	18	0.4	170	3.6	0	0	31	0.7	88	1.9	135	2.9	11.7
91300	3737	3520	42	1.1	9	0.2	87	2.3	4	0.1	19	0.5	56	1.5	89	2.4	7.5
91400	2195	2023	69	3.1	14	0.6	31	1.4	0	0	9	0.4	49	2.2	84	3.8	10.8
100100	3693	2870	182	4.9	52	1.4	49	1.3	6	0.2	329	8.9	205	5.6	748	20.3	30.4
100200	3724	2857	251	6.7	72	1.9	84	2.3	0	0	278	7.5	182	4.9	647	17.4	30.8
100300	3067	2436	185	6	46	1.5	56	1.8	0	0	196	6.4	148	4.8	424	13.8	26.1
100400	2801	2446	116	4.1	48	1.7	44	1.6	0	0	68	2.4	79	2.8	212	7.6	16.8
100500	3557	3110	143	4	59	1.7	55	1.5	0	0	88	2.5	102	2.9	341	9.6	18.1
100600	2103	1919	40	1.9	18	0.9	25	1.2	0	0	44	2.1	57	2.7	132	6.3	12.1
100700	2834	2672	31	1.1	14	0.5	40	1.4	0	0	44	1.6	33	1.2	157	5.5	9.2
100800	2975	2797	31	1	10	0.3	44	1.5	0	0	31	1	62	2.1	119	4	8.7
100900	3662	3056	154	4.2	26	0.7	218	6	4	0.1	84	2.3	120	3.3	287	7.8	20.9
101000	5121	4244	348	6.8	40	0.8	227	4.4	3	0.1	113	2.2	146	2.9	362	7.1	21.1
101100	1812	1661	40	2.2	11	0.6	55	3	0	0	27	1.5	18	1	98	5.4	11.8
101200	3240	3067	22	0.7	20	0.6	34	1	0	0	55	1.7	42	1.3	128	4	7.5
101300	3142	2889	63	2	30	1	49	1.6	2	0.1	48	1.5	61	1.9	185	5.9	11.2
101400	3660	3318	84	2.3	22	0.6	56	1.5	1	0	97	2.7	82	2.2	250	6.8	12.5
101500	4420	3825	161	3.6	55	1.2	29	0.7	0	0	194	4.4	156	3.5	507	11.5	19.3
101600	4582	3925	168	3.7	63	1.4	36	0.8	2	0	275	6	113	2.5	710	15.5	22.1
101700	3369	2957	119	3.5	55	1.6	39	1.2	0	0	93	2.8	106	3.1	288	8.5	16.3
101800	2649	2347	61	2.3	7	0.3	91	3.4	1	0	91	3.4	51	1.9	175	6.6	14.0
110100	4305	2984	433	10.1	37	0.9	140	3.3	2	0	528	12.3	181	4.2	1134	26.3	42.0
120101	3953	3656	68	1.7	20	0.5	129	3.3	1	0	26	0.7	53	1.3	186	4.7	10.9
120102	3891	3652	52	1.3	12	0.3	94	2.4	0	0	36	0.9	45	1.2	171	4.4	9.0
120201	3606	3316	41	1.1	16	0.4	119	3.3	1	0	53	1.5	60	1.7	172	4.8	10.6
120202	3173	2847	56	1.8	27	0.9	55	1.7	0	0	89	2.8	99	3.1	304	9.6	15.8
120203	3529	3084	122	3.5	30	0.9	118	3.3	4	0.1	84	2.4	87	2.5	337	9.5	18.7
120300	1987	1775	24	1.2	18	0.9	47	2.4	0	0	51	2.6	72	3.6	268	13.5	20.0
120400	7312	6153	313	4.3	70	1	286	3.9	0	0	278	3.8	212	2.9	861	11.8	22.5
120501	3960	3393	105	2.7	31	0.8	229	5.8	3	0.1	91	2.3	108	2.7	356	9	20.3
120502	5246	4556	101	1.9	27	0.5	329	6.3	5	0.1	125	2.4	103	2	438	8.3	18.5
130100	4869	4567	51	1	25	0.5	113	2.3	0	0	53	1.1	60	1.2	228	4.7	9.4
130200	2822	2716	24	0.9	12	0.4	21	0.7	1	0	13	0.5	35	1.2	105	3.7	6.7
140100	2999	2823	10	0.3	5	0.2	132	4.4	0	0	2	0.1	27	0.9	56	1.9	7.5
140201	5235	4817	74	1.4	41	0.8	131	2.5	1	0	53	1	118	2.3	287	5.5	11.4
140202	5812	5397	86	1.5	13	0.2	171	2.9	1	0	65	1.1	79	1.4	324	5.6	11.1
150100	8972	7637	175	2	51	0.6	825	9.2	3	0	91	1	190	2.1	518	5.8	18.9
150301	5906	5571	57	1	19	0.3	130	2.2	2	0	61	1	66	1.1	257	4.4	8.7
150303	4856	4652	43	0.9	12	0.2	96	2	1	0	18	0.4	34	0.7	132	2.7	6.4
150304	4041	3634	80	2	13	0.3	232	5.7	2	0	20	0.5	60	1.5	162	4	13.3
160100	6528	5908	135	2.1	46	0.7	202	3.1	1	0	122	1.9	114	1.7	509	7.8	14.9
160202	7310	6490	131	1.8	59	0.8	309	4.2	1	0	150	2.1	170	2.3	542	7.4	15.8
160203	6069	5209	234	3.9	41	0.7	290	4.8	7	0.1	138	2.3	150	2.5	495	8.2	19.3

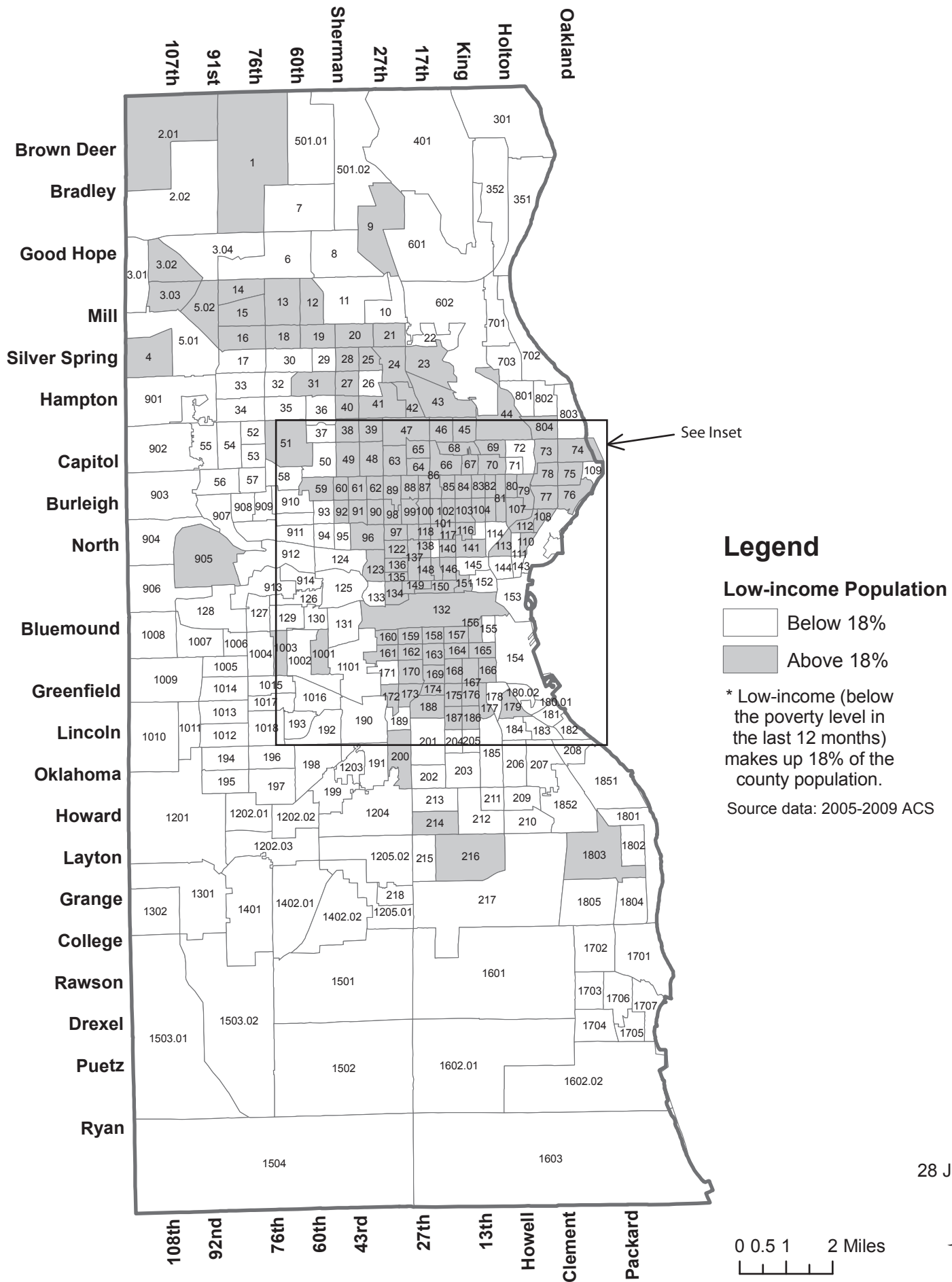
Milwaukee County Population and Race Distribution Chart 2010

Census Tract	2010 Population	White	Black		American Indian and Alaska Native		Asian		Native Hawaiian and Pacific Islander		Other		Multiracial		Hispanic or Latino		Total Minority
			#	%	#	%	#	%	#	%	#	%	#	%	#	%	
160204	4962	3939	253	5.1	25	0.5	443	8.9	4	0.1	161	3.2	137	2.8	421	8.5	24.8
160300	9582	8676	205	2.1	76	0.8	309	3.2	4	0	149	1.6	163	1.7	615	6.4	14.0
170100	2689	2524	38	1.4	10	0.4	16	0.6	0	0	44	1.6	57	2.1	187	7	10.6
170200	3869	3455	118	3	23	0.6	78	2	0	0	124	3.2	71	1.8	341	8.8	15.6
170300	2662	2489	56	2.1	25	0.9	13	0.5	1	0	23	0.9	55	2.1	144	5.4	10.0
170400	3362	3161	36	1.1	20	0.6	41	1.2	0	0	46	1.4	58	1.7	189	5.6	9.8
170500	2471	2266	55	2.2	22	0.9	13	0.5	0	0	58	2.3	57	2.3	183	7.4	12.1
170600	3384	2981	77	2.3	56	1.7	44	1.3	1	0	110	3.3	115	3.4	422	12.5	19.7
170700	2719	2513	52	1.9	18	0.7	28	1	0	0	48	1.8	60	2.2	233	8.6	13.0
180100	3029	2725	34	1.1	17	0.6	28	0.9	0	0	133	4.4	92	3	286	9.4	13.6
180200	4536	3905	133	2.9	65	1.4	54	1.2	1	0	241	5.3	137	3	552	12.2	18.7
180300	3371	2861	178	5.3	44	1.3	46	1.4	2	0.1	118	3.5	122	3.6	424	12.6	22.4
180400	2735	2570	28	1	16	0.6	33	1.2	0	0	41	1.5	47	1.7	134	4.9	8.8
180500	4596	4158	113	2.5	19	0.4	92	2	3	0.1	122	2.7	89	1.9	373	8.1	14.3
185100	4210	3751	106	2.5	44	1	111	2.6	1	0	103	2.4	94	2.2	312	7.4	14.7
185200	5149	4564	146	2.8	46	0.9	89	1.7	0	0	163	3.2	141	2.7	571	11.1	17.8
185300	3438	3090	143	4.2	13	0.4	104	3	0	0	32	0.9	56	1.6	116	3.4	12.2
185400	1639	33	1522	92.9	1	0.1	16	1	0	0	34	2.1	33	2	58	3.5	98.2
185500	1709	46	1594	93.3	11	0.6	8	0.5	0	0	9	0.5	41	2.4	46	2.7	97.7
185600	1776	269	1375	77.4	14	0.8	15	0.8	0	0	16	0.9	87	4.9	71	4	85.9
185700	2124	76	1940	91.3	11	0.5	3	0.1	1	0	28	1.3	65	3.1	85	4	97.4
185800	1606	77	1331	82.9	4	0.2	94	5.9	0	0	54	3.4	46	2.9	97	6	97.0
185900	1213	50	1063	87.6	0	0	74	6.1	0	0	7	0.6	19	1.6	28	2.3	96.6
186000	1451	177	1245	85.8	5	0.3	4	0.3	0	0	9	0.6	11	0.8	28	1.9	88.6
186100	2275	128	1706	75	7	0.3	297	13.1	0	0	61	2.7	76	3.3	111	4.9	96.0
186200	1422	110	1161	81.6	5	0.4	78	5.5	0	0	24	1.7	44	3.1	53	3.7	93.7
186300	3268	1608	1466	44.9	29	0.9	72	2.2	5	0.2	26	0.8	62	1.9	163	5	54.4
186400	1643	1333	178	10.8	11	0.7	83	5.1	0	0	23	1.4	15	0.9	105	6.4	22.9
186500	1667	997	143	8.6	24	1.4	15	0.9	0	0	423	25.4	65	3.9	969	58.1	69.5
186600	2152	1120	238	11.1	43	2	32	1.5	15	0.7	562	26.1	142	6.6	1238	57.5	73.9
186800	1614	775	422	26.1	25	1.5	57	3.5	0	0	288	17.8	47	2.9	596	36.9	67.8
186900	2213	1910	108	4.9	4	0.2	151	6.8	2	0.1	8	0.4	30	1.4	68	3.1	16.2
187000	3288	2783	271	8.2	6	0.2	119	3.6	2	0.1	38	1.2	69	2.1	115	3.5	17.2
187200	5384	3752	1303	24.2	8	0.1	238	4.4	0	0	21	0.4	62	1.2	252	4.7	34.1
187300	6293	5621	76	1.2	23	0.4	389	6.2	0	0	55	0.9	129	2	271	4.3	13.8
187400	2341	2085	127	5.4	2	0.1	81	3.5	1	0	17	0.7	28	1.2	79	3.4	13.2
980000	0	0	0		0		0		0		0		0		0		0.0
990000	0	0	0		0		0		0		0		0		0		0.0

Note: Highlighted cells have a total minority rate greater than the county average of 45.7%

Data Source: Data from 2010 Decennial Census.

Low-Income Population by Census Tract Compared to Milwaukee County Low-Income Population



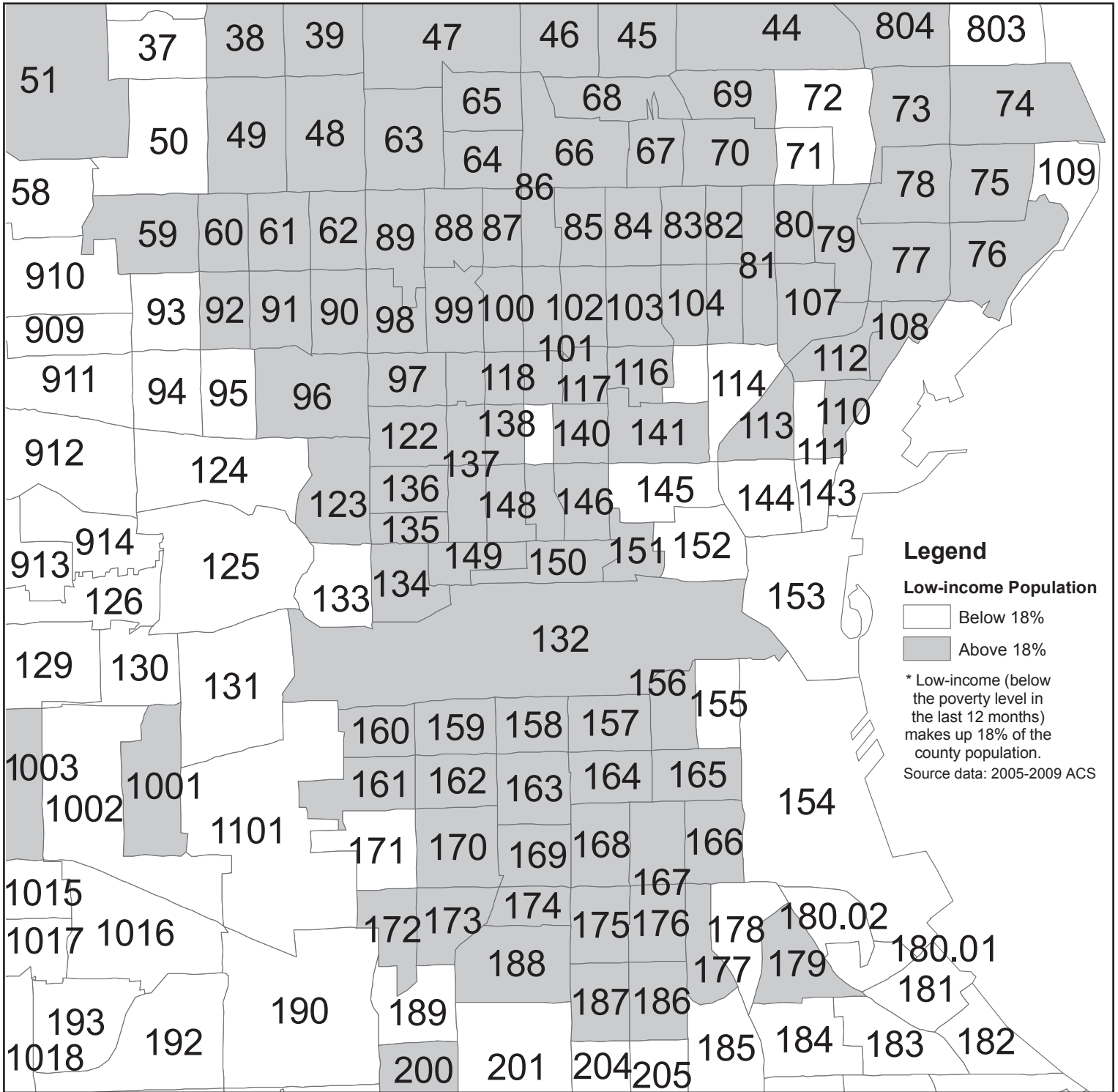
28 July 2011



0 0.5 1 2 Miles

Map Inset

Low-Income Population by Census Tract Compared to Milwaukee County Low-Income Population



Milwaukee County Population and Poverty Distribution Chart

Census Tract	Total Population	Poverty Population	Percent Poverty
1	7373	1478	20.0
2.01	4885	1752	35.9
2.02	6177	902	14.6
3.01	1500	43	2.9
3.02	2938	879	29.9
3.03	2269	504	22.2
3.04	3404	32	0.9
4	2659	630	23.7
5.01	3494	221	6.3
5.02	3787	1288	34.0
6	6291	1049	16.7
7	3674	444	12.1
8	4855	585	12.0
9	3717	955	25.7
10	3798	619	16.3
11	3004	357	11.9
12	2842	1150	40.5
13	3977	1000	25.1
14	2620	1131	43.2
15	3056	971	31.8
16	2992	923	30.8
17	4780	699	14.6
18	3072	1330	43.3
19	3466	887	25.6
20	2477	601	24.3
21	2259	712	31.5
22	1932	175	9.1
23	4457	1411	31.7
24	2616	968	37.0
25	2159	511	23.7
26	2868	396	13.8
27	1822	635	34.9
28	2174	680	31.3
29	1725	262	15.2
30	3558	402	11.3
31	3327	647	19.4
32	2809	345	12.3
33	5142	669	13.0
34	5723	802	14.0
35	3589	579	16.1
36	1548	251	16.2
37	2451	90	3.7
38	2249	406	18.1
39	2480	465	18.8
40	2873	1237	43.1
41	2710	538	19.9
42	2595	644	24.8
43	4908	1614	32.9
44	2954	1140	38.6
45	2835	1531	54.0
46	3191	801	25.1
47	4693	1617	34.5
48	4390	1318	30.0
49	4257	889	20.9
50	4368	486	11.1
51	3198	940	29.4

Milwaukee County Population and Poverty Distribution Chart

Census Tract	Total Population	Poverty Population	Percent Poverty
52	1818	130	7.2
53	2214	92	4.2
54	3889	488	12.5
55	3677	98	2.7
56	2005	78	3.9
57	2650	81	3.1
58	3708	365	9.8
59	3966	882	22.2
60	2466	572	23.2
61	2318	708	30.5
62	3296	1741	52.8
63	2247	1181	52.6
64	2704	1457	53.9
65	2640	1045	39.6
66	2943	1093	37.1
67	1797	876	48.7
68	2264	768	33.9
69	2353	778	33.1
70	2695	1143	42.4
71	1860	288	15.5
72	3150	419	13.3
73	2463	754	30.6
74	1652	439	26.6
75	2591	714	27.6
76	3489	770	22.1
77	3377	876	25.9
78	3027	1496	49.4
79	1968	405	20.6
80	2268	745	32.8
81	1475	933	63.3
82	1072	496	46.3
83	971	623	64.2
84	1237	753	60.9
85	1382	710	51.4
86	1452	695	47.9
87	1805	1150	63.7
88	1799	825	45.9
89	1464	845	57.7
90	2748	1440	52.4
91	2276	1206	53.0
92	2057	519	25.2
93	2760	354	12.8
94	2707	285	10.5
95	2436	242	9.9
96	1712	690	40.3
97	2200	1013	46.0
98	1654	704	42.6
99	1341	508	37.9
100	833	490	58.8
101	1016	653	64.3
102	1172	264	22.5
103	766	455	59.4
104	976	614	62.9
105	1290	365	28.3
106	1408	699	49.6

Milwaukee County Population and Poverty Distribution Chart

Census Tract	Total Population	Poverty Population	Percent Poverty
107	2504	949	37.9
108	1981	482	24.3
109	5185	738	14.2
110	3265	592	18.1
111	2030	324	16.0
112	2446	524	21.4
113	1228	402	32.7
114	859	60	7.0
115	384	0	0.0
116	1122	656	58.5
117	356	184	51.7
118	331	201	60.7
119	477	149	31.2
120	831	385	46.3
121	945	374	39.6
122	2238	467	20.9
123	794	395	49.7
124	2713	252	9.3
125	2013	140	7.0
126	2268	183	8.1
127	1350	85	6.3
128	2964	514	17.3
129	3255	346	10.6
130	1871	134	7.2
131	0	0	0.0
132	1855	604	32.6
133	1102	194	17.6
134	3000	904	30.1
135	1782	721	40.5
136	2856	1531	53.6
137	1638	836	51.0
138	1306	645	49.4
139	569	99	17.4
140	332	136	41.0
141	1267	924	72.9
143	2388	133	5.6
144	1910	224	11.7
145	0	0	0.0
146	1841	1277	69.4
147	2666	2169	81.4
148	1641	790	48.1
149	1774	636	35.9
150	500	312	62.4
151	163	92	56.4
152	1118	182	16.3
153	1156	59	5.1
154	143	0	0.0
155	833	60	7.2
156	932	390	41.8
157	3283	975	29.7
158	3535	1276	36.1
159	3460	793	22.9
160	3005	1054	35.1
161	3156	660	20.9
162	3437	1137	33.1
163	4133	1675	40.5

Milwaukee County Population and Poverty Distribution Chart

Census Tract	Total Population	Poverty Population	Percent Poverty
164	4196	1661	39.6
165	2735	1278	46.7
166	2522	785	31.1
167	3190	1396	43.8
168	3101	1222	39.4
169	5029	2573	51.2
170	6126	1881	30.7
171	2925	521	17.8
172	2609	617	23.6
173	3514	776	22.1
174	2784	1024	36.8
175	3925	1318	33.6
176	3190	1393	43.7
177	1509	539	35.7
178	207	12	5.8
179	2995	564	18.8
180.01	1224	2	0.2
180.02	1820	204	11.2
181	1767	89	5.0
182	1824	39	2.1
183	2492	254	10.2
184	1406	211	15.0
185	1838	17	0.9
186	2910	844	29.0
187	3078	664	21.6
188	1990	649	32.6
189	1853	328	17.7
190	4761	354	7.4
191	3240	582	18.0
192	3512	258	7.3
193	2569	96	3.7
194	3992	424	10.6
195	3692	306	8.3
196	3905	246	6.3
197	6044	829	13.7
198	5204	335	6.4
199	3664	292	8.0
200	3760	748	19.9
201	3215	338	10.5
202	3014	331	11.0
203	4271	326	7.6
204	2933	334	11.4
205	3260	392	12.0
206	4189	148	3.5
207	4853	554	11.4
208	3588	589	16.4
209	2753	159	5.8
210	2226	195	8.8
211	1641	100	6.1
212	2044	229	11.2
213	1466	141	9.6
214	3145	818	26.0
215	2747	75	2.7
216	4366	1229	28.1
217	6477	569	8.8
218	1995	10	0.5

Milwaukee County Population and Poverty Distribution Chart

Census Tract	Total Population	Poverty Population	Percent Poverty
301	4307	91	2.1
351	2239	88	3.9
352	4292	109	2.5
401	1823	46	2.5
501.01	5876	247	4.2
501.02	5991	439	7.3
601	7149	226	3.2
602	5369	500	9.3
701	4184	121	2.9
702	4864	102	2.1
703	4631	135	2.9
801	2790	190	6.8
802	3470	333	9.6
803	3847	187	4.9
804	3122	607	19.4
901	3986	38	1.0
902	1843	136	7.4
903	3295	120	3.6
904	3028	30	1.0
905	251	251	100.0
906	4562	192	4.2
907	3141	82	2.6
908	2346	138	5.9
909	3398	95	2.8
910	4169	91	2.2
911	4208	145	3.4
912	4604	462	10.0
913	3615	232	6.4
914	2133	208	9.8
1001	3801	1030	27.1
1002	3652	446	12.2
1003	2843	536	18.9
1004	2721	446	16.4
1005	3136	426	13.6
1006	1935	146	7.5
1007	2554	62	2.4
1008	2748	263	9.6
1009	3847	554	14.4
1010	5598	763	13.6
1011	1814	181	10.0
1012	2903	86	3.0
1013	2868	283	9.9
1014	3409	351	10.3
1015	4721	386	8.2
1016	4184	395	9.4
1017	3455	349	10.1
1018	2606	228	8.7
1101	3861	678	17.6
1201	8109	281	3.5
1202.01	3874	254	6.6
1202.02	3041	201	6.6
1202.03	3316	178	5.4
1203	1860	38	2.0
1204	6457	499	7.7
1205.01	3987	159	4.0
1205.02	4738	234	4.9

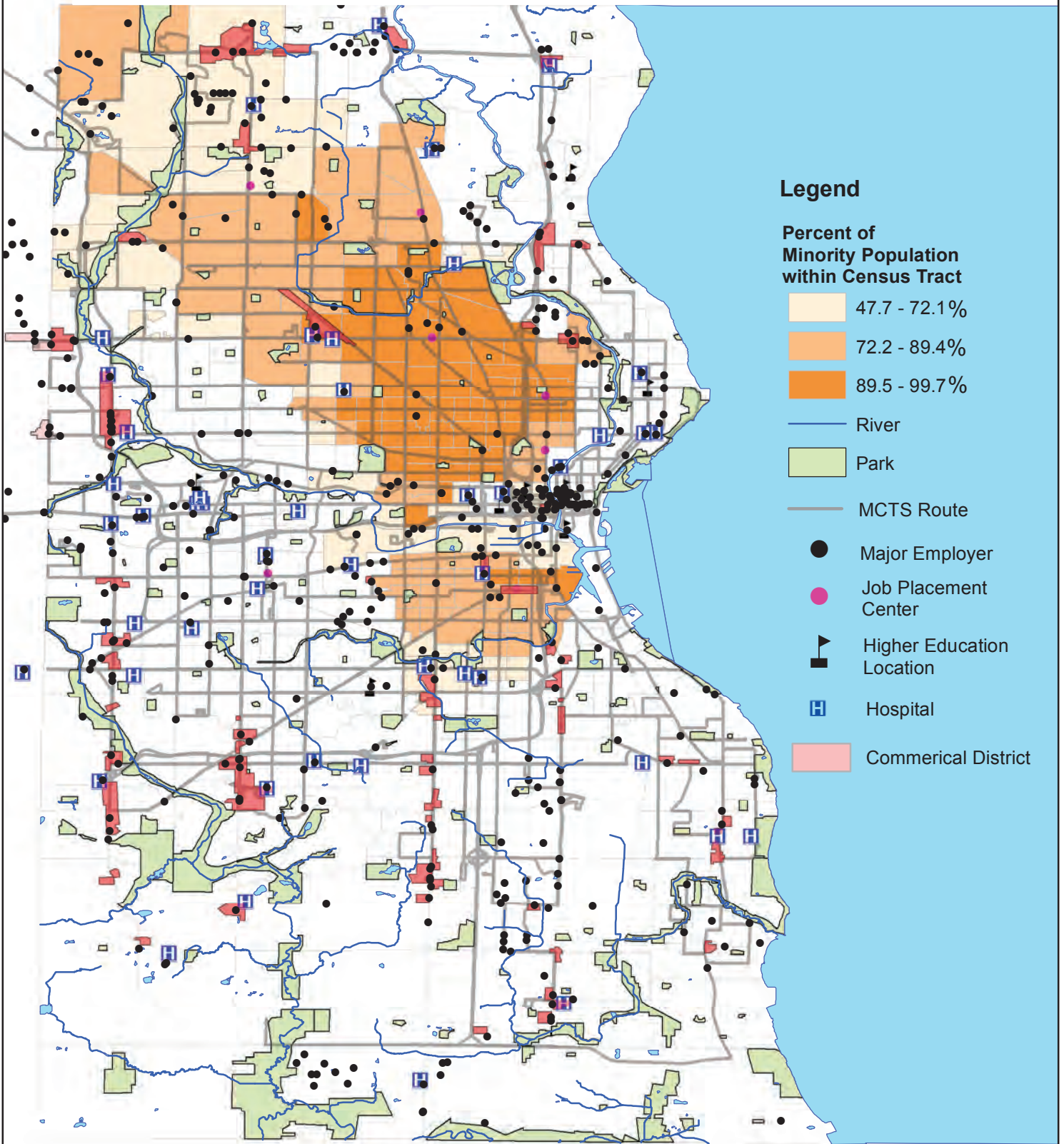
Milwaukee County Population and Poverty Distribution Chart

Census Tract	Total Population	Poverty Population	Percent Poverty
1301	4829	137	2.8
1302	2824	277	9.8
1401	2882	174	6.0
1402.01	5084	302	5.9
1402.02	5849	417	7.1
1501	9051	347	3.8
1502	8594	208	2.4
1503.01	5567	450	8.1
1503.02	8873	300	3.4
1504	1101	53	4.8
1601	5818	394	6.8
1602.01	10687	931	8.7
1602.02	7278	599	8.2
1603	9425	81	0.9
1701	3126	166	5.3
1702	3937	324	8.2
1703	2795	289	10.3
1704	3107	29	0.9
1705	1888	298	15.8
1706	3944	591	15.0
1707	2306	164	7.1
1801	3258	379	11.6
1802	4911	788	16.0
1803	3487	681	19.5
1804	2911	230	7.9
1805	4091	196	4.8
1851	3978	296	7.4
1852	5692	475	8.3

Note: Highlighted census tracts have a total poverty rate greater than the county average of 18%.

Data Source: 2005-2009 American Community Survey

Milwaukee County Transit System Percent of Minority Population within Census Tract



Legend

Percent of Minority Population within Census Tract

47.7 - 72.1%

72.2 - 89.4%

89.5 - 99.7%

River

Park

MCTS Route

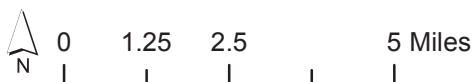
Major Employer

Job Placement Center

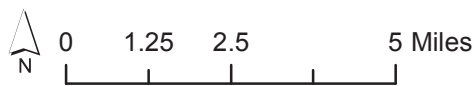
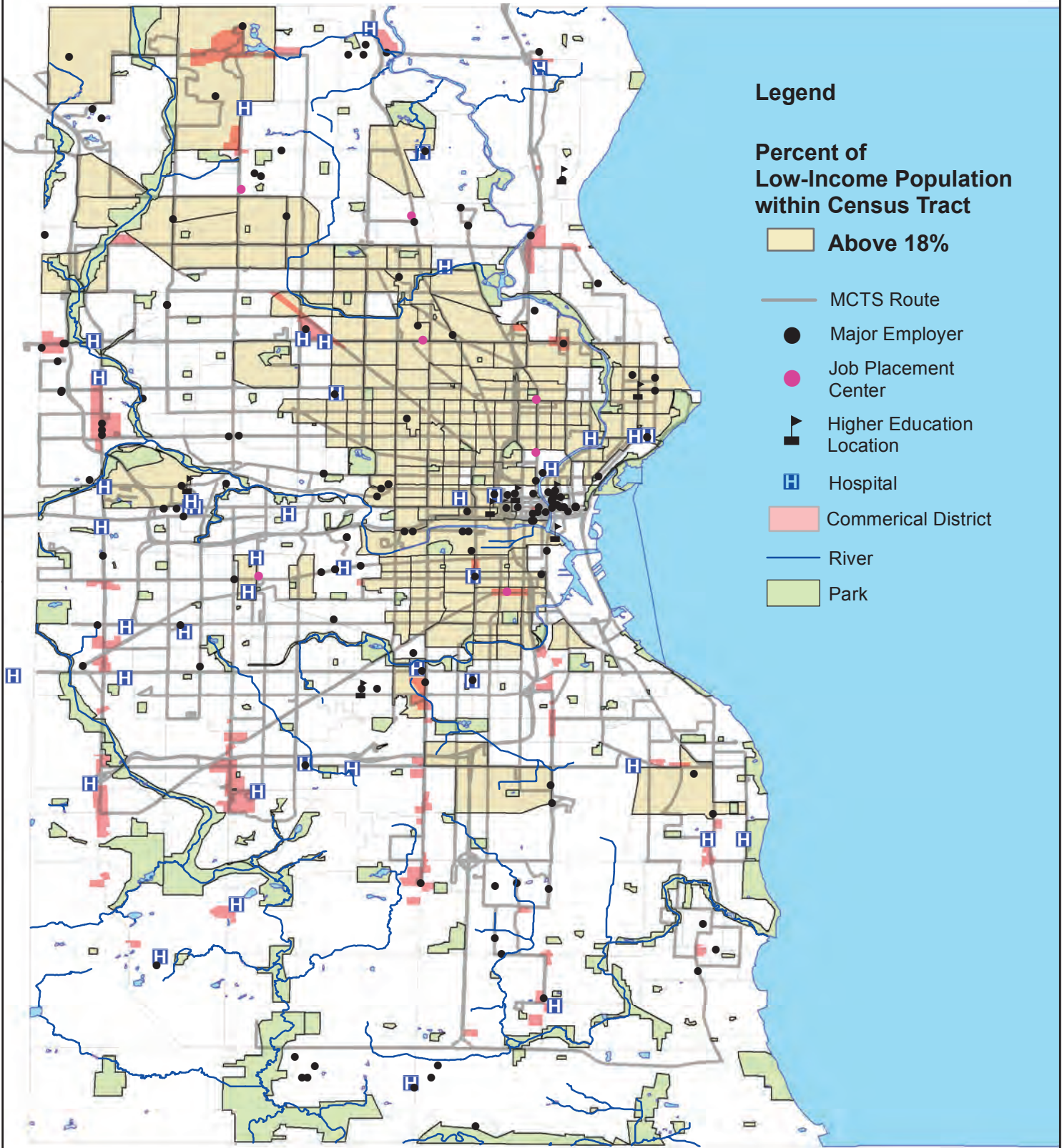
Higher Education Location

Hospital

Commerical District



Milwaukee County Transit System Percent of Low-Income Population within Census Tract



Source: Map Produced by MCTS Planning Department
Location: L:\Apps\Arcview\Projects\ATillman\MXD

**MILWAUKEE COUNTY
TRANSIT SYSTEM**

CUSTOMER STUDY

April, 2014

**PREPARED BY:
MANAGEMENT DECISIONS, INC.
6525 W. BLUEMOUND RD.
MILWAUKEE, WI 53213
414/774-0623**

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EXECUTIVE SUMMARY

As detailed in this report, a number of conclusions follow from the analysis of Milwaukee County Transit customers and their evaluation of the bus service they receive. The main findings from the study are:

- Rider demographics changed slightly over the past 1-1/2 years.
- Fifteen percent (15.0%) said their bus usage decreased this wave, which is an increase compared to the previous year (13.6%).
- When asked why their bus usage decreased, the reason mentioned most in April, 2014 was access to an automobile (35.0%) which is lower when compared to the previous year (48.6%).
- Overall satisfaction with MCTS this wave of the study has declined statistically with eighty-three percent (82.5%) of riders reporting their bus service needs being met or exceeded compared to eighty-eight percent (87.6%) in the previous year.

OBJECTIVES & METHODOLOGY

The Milwaukee County Transit System is interested in better understanding their customers and satisfaction with their services. At the request of MCTS, Management Decisions Inc. is conducting a customer satisfaction tracking study.

This telephone survey is designed with primarily two purposes: First, to create a ridership profile, and secondly, to measure ridership overall satisfaction and satisfaction with specific aspects of bus service. In addition, areas of special interest are frequently incorporated into the scope of the research. A copy of the questionnaire appears in Appendix A.

The sampling frame was based on a systematic random sampling of households in the MCTS service area. Potential respondents were 18 years of age or older and had ridden a MCTS bus within the past three months.

The study began in July, 1995. Data was collected quarterly, (January, April, July, and October) through April, 1997; (a total of eight waves). Since then, the study has been conducted on a semi-annual basis, (October and April) exceptions being May, 2001 and March, 2004. In 2006 just one wave of 400 interviews was conducted. In 2007 the study returned to being conducted on a semi-annual basis. The most recent wave of 400 interviews was conducted in April, 2014.

To date, a total of 16,100 telephone interviews have been conducted. For the first four waves, 200 interviews per wave were conducted. During the following four waves, 250 interviews per wave were conducted. For the semi-annual waves before April, 2003, a total of 500 interviews were conducted for each wave. Beginning in April, 2003, a total of 400 interviews have been conducted per wave.

Beginning in April, 2012, in addition to landline phone numbers, the random sample had cell phone numbers included as well. Over time there has been a gradual shift from landline completes to greater cell phone completes. In April 2014, forty-seven percent (47.0%) of the completes came from cell phones.

This report presents a “snap-shot” and longitudinal examination of the data collected. It focuses on the survey results of the most recent wave, (April, 2014; Wave 41) and those of the previous modified year, which includes the last two waves, (April, 2013 & October 2013; Waves 39 & 40).

The term “significance” appearing in the text implies that reported differences are not likely due to chance or error, and appear to be real differences in the population.

OBJECTIVES & METHODOLOGY

Management Decisions, Inc.

Sampling error varies with sample size, the variability in answers to specific questions and sub-groups within each sample. Generally-speaking, the following are margins of error for various random sample sizes at the 95% confidence level ranges:

<u>Sample size</u>	<u>95% agreement (little variability)</u>	<u>50% agreement (maximum variability)</u>
800	+/- 1.5%	+/- 3.5%
400	+/- 2.1%	+/- 4.9%
200	+/- 3.0%	+/- 6.9%

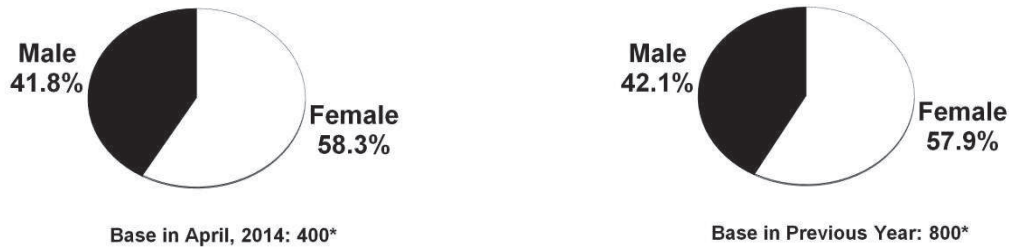
Other potential errors in conducting any telephone survey include non-response error, response error, interviewing error and data processing error. Management Decisions, Inc. exercises proven and professionally accepted research procedures to help minimize these types of errors.

Percentages shown in the charts may not always add to 100% due to rounding errors and/or because certain questions allow for multiple responses.

RIDERSHIP PROFILE

Four hundred recent MCTS adult riders were interviewed during April, 2014¹. Results from this most recent wave are matched with results from 800 interviews conducted in the modified previous year (where possible).

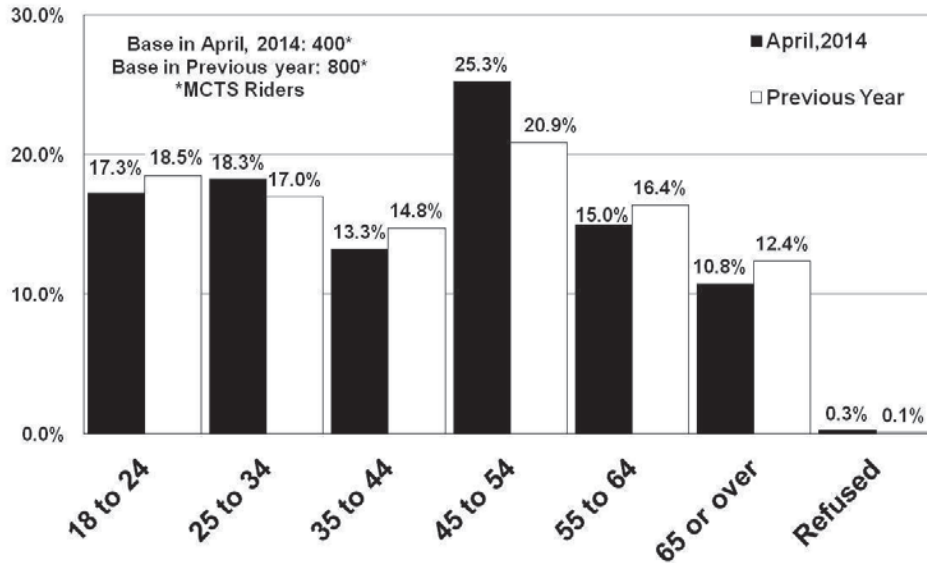
GENDER



*MCTS Riders

Fifty-eight percent (58.3%) of the respondents interviewed were female, and forty-two percent (41.8%) were male, almost identical to the previous year.

AGE



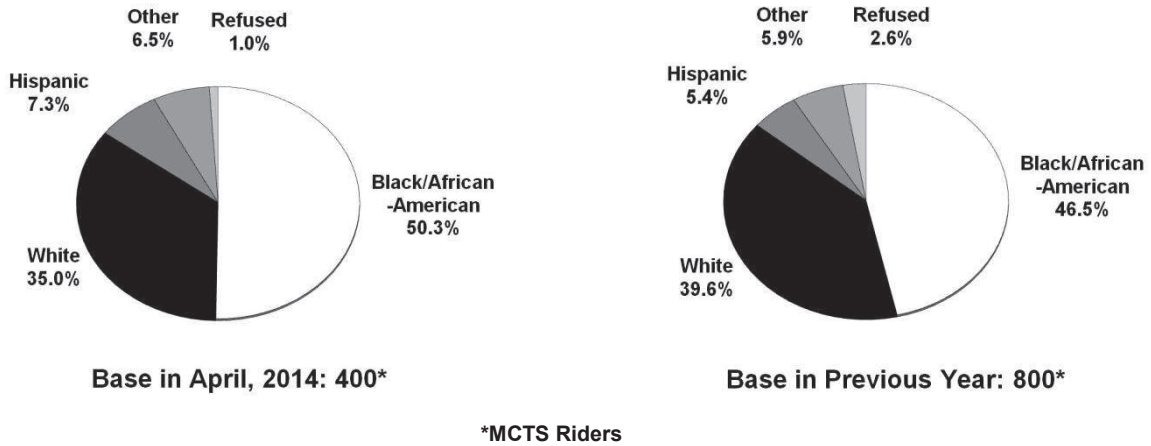
In April, 2014, twenty-five percent (25.3%) of the respondents interviewed were ages 45-54 compared to the previous year where twenty-one percent (20.9%) were ages 45-54. All other age groups varied by one point eight percent (1.6%) or less.

¹ Ridership profile tables can be found in Appendix B.

RIDERSHIP PROFILE

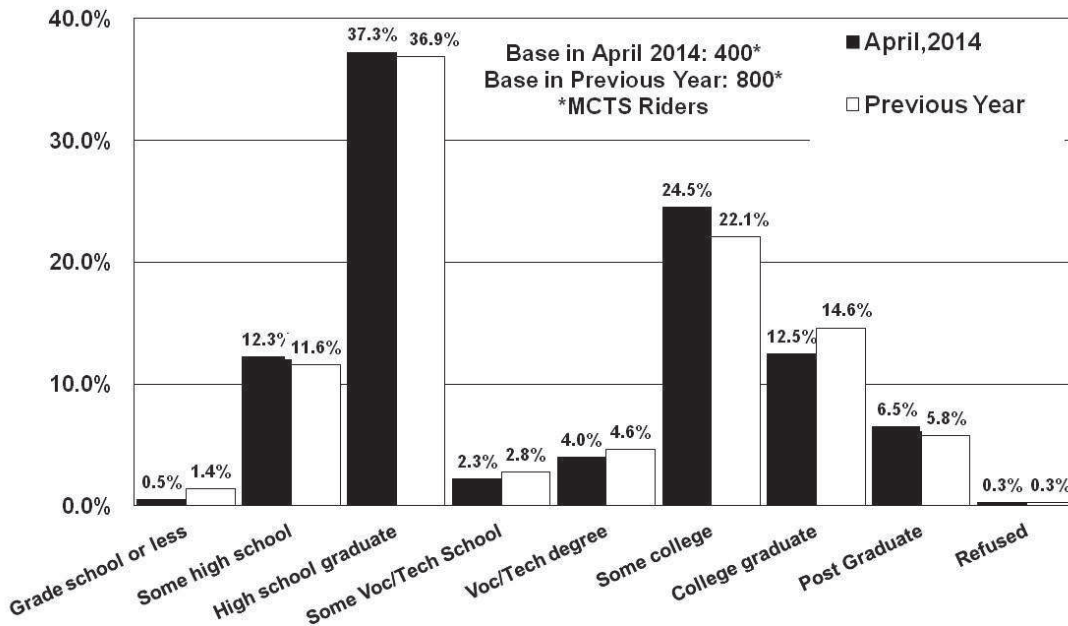
Management Decisions, Inc.

ETHNICITY



In April, 2014, thirty-five percent (35.0%) of the respondents interviewed were White/Caucasian compared to the previous year where forty percent (39.6%) were White/Caucasian. In April, 2014 the category multiracial was added into the other category.

EDUCATION

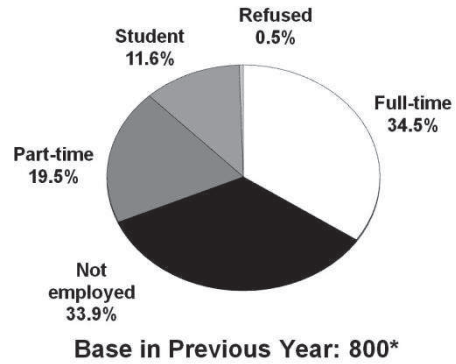
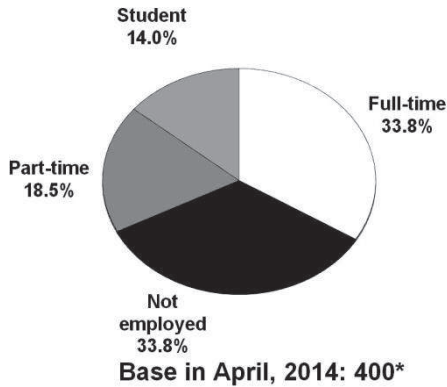


In general, education remained similar to the previous year with eighty-seven percent (87.1%) having finished high school and fifty percent (49.8%) receiving formal education beyond high school.

RIDERSHIP PROFILE

Management Decisions, Inc.

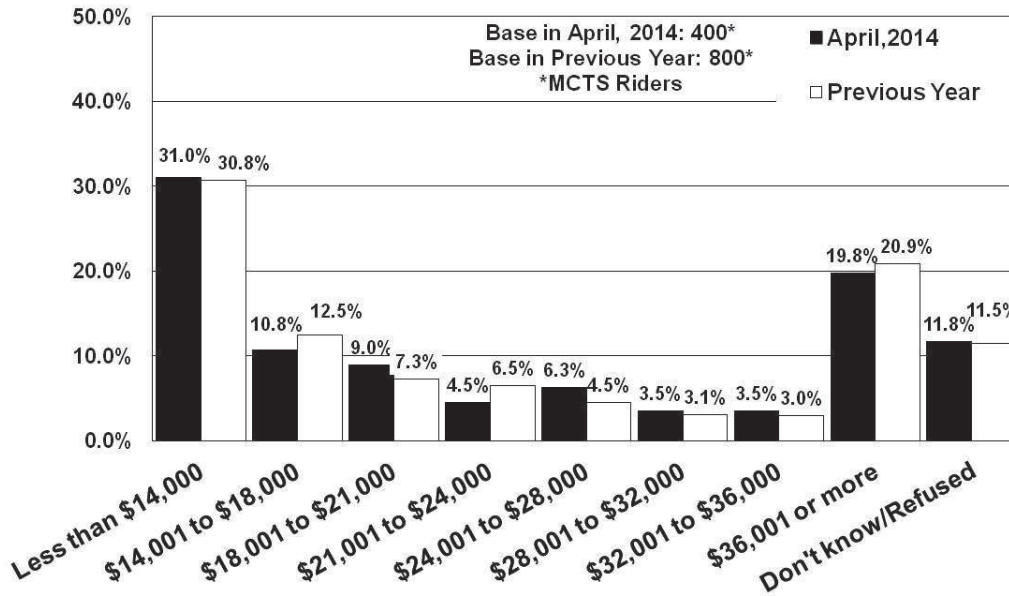
EMPLOYMENT



*MCTS Riders

Thirty-four percent (33.8%) of MCTS riders were unemployed this wave; the same as in the previous year (33.9%). Riders who were not employed were equal to those who were employed full time in April, 2014, as well as in the previous year, with thirty-four percent (33.8% and 34.5% respectively).

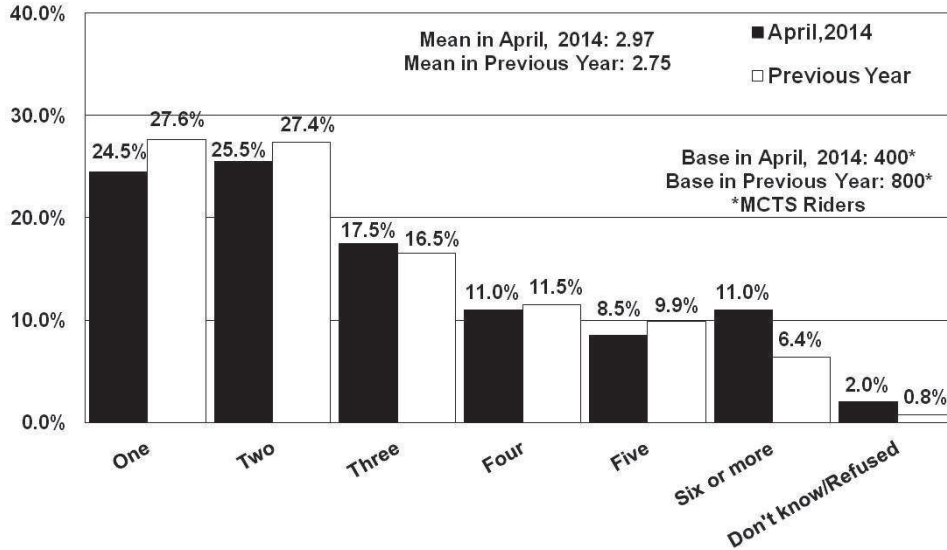
TOTAL HOUSEHOLD INCOME



In April, 2014 over half (61.6%) of riders said they earned less than \$28,001 in total household income this wave, which is identical to the previous year (61.6%). A subset within the \$28,001 or less range, \$21,001 – \$24,000, shows a decrease between April, 2013 (4.5%) and the previous year (6.5%). The percentage of riders with a household income of \$28,001 statistically remained the same between the current wave (26.8%) and the previous one (27.0%).

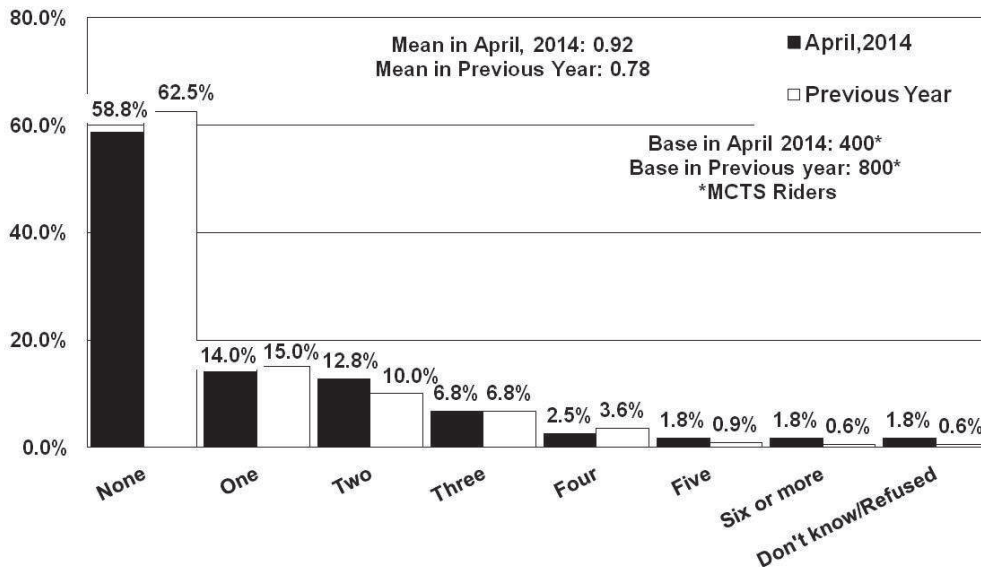
RIDERSHIP PROFILE

NUMBER IN HOUSEHOLD



In April, 2014, seventy-four percent (73.5%) of riders live in households having two or more residents, compared to the previous year (71.7%). Twenty-five percent (24.5%) of riders are living by themselves this wave, a decrease compared to the previous year (27.6%).

DEPENDENTS UNDER 18 LIVING IN HOUSEHOLD

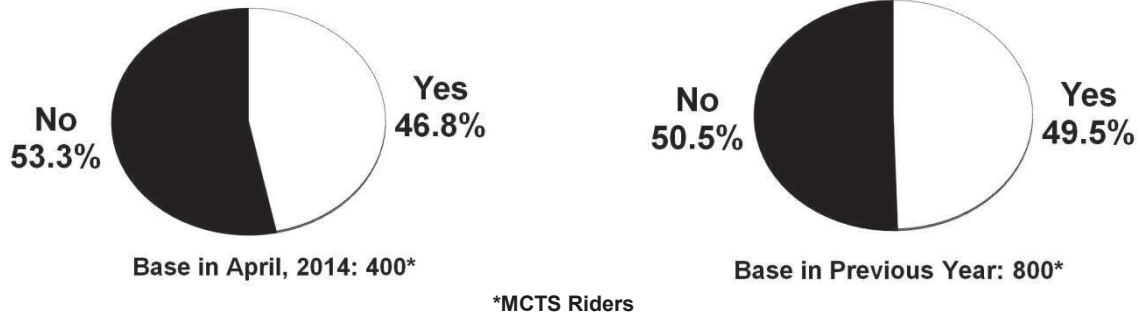


Fifty-nine percent (58.8%) of the riders this wave have no dependents under 18 living in their households, a decrease from the previous year (62.5%). The remaining households (39.7%) have one or more dependents, which is higher than the previous year (36.9%).

RIDERSHIP PROFILE

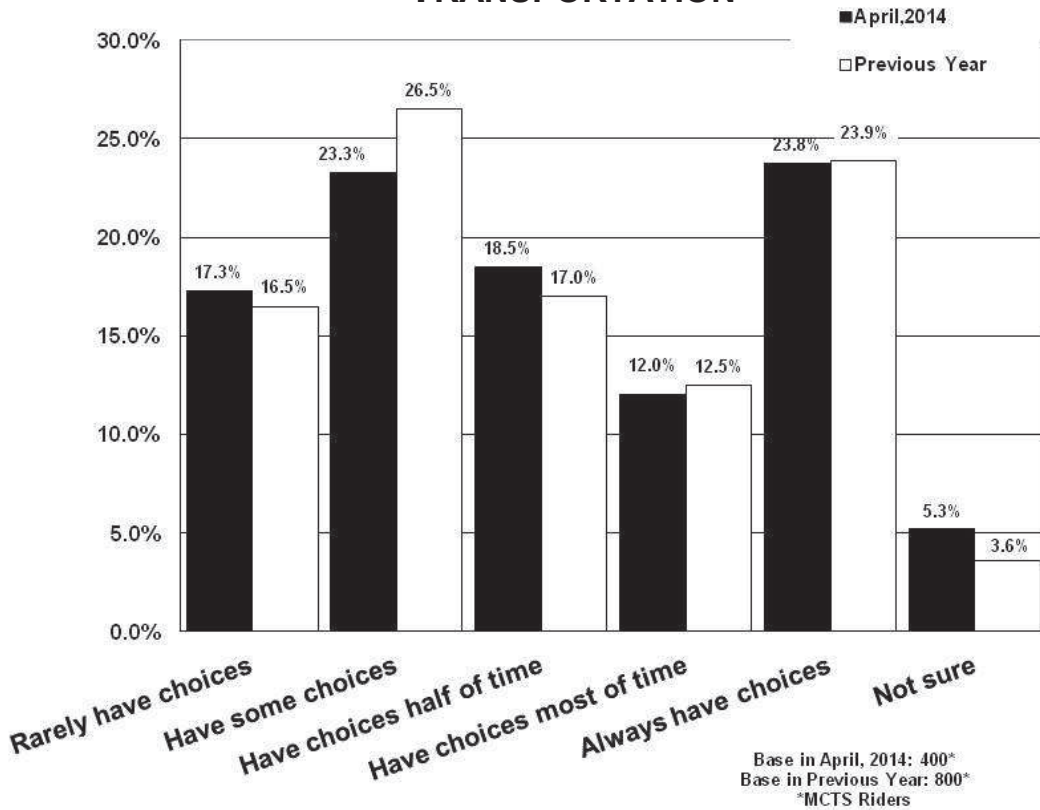
Management Decisions, Inc.

VALID DRIVER'S LICENSE



More than half (53.3%) of the riders surveyed in April, 2014 did not have a valid driver's license, which is an increase from the previous year (50.5%).

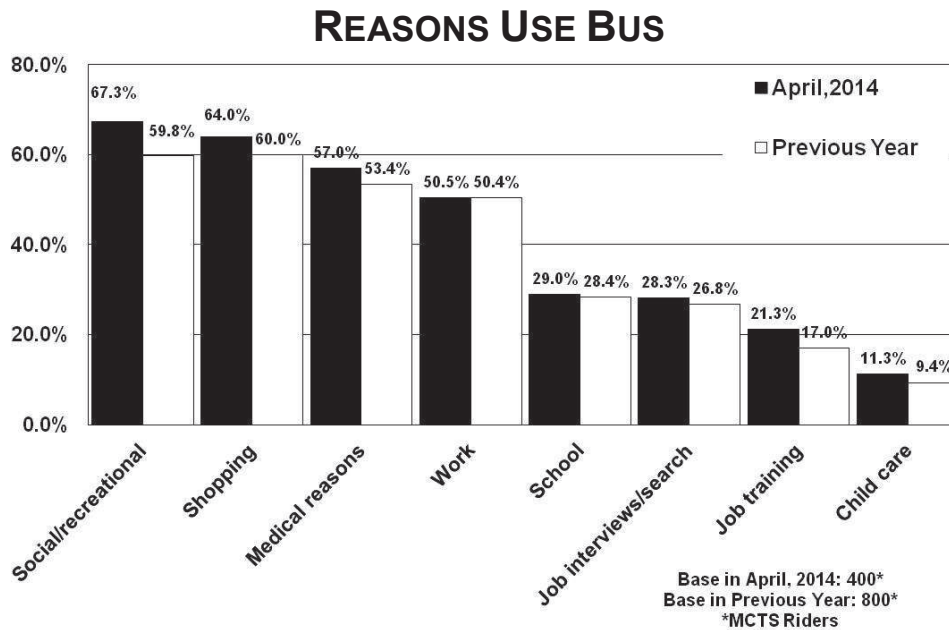
MAKING DECISIONS ABOUT RIDING THE BUS OR SOME OTHER TRANSPORTATION



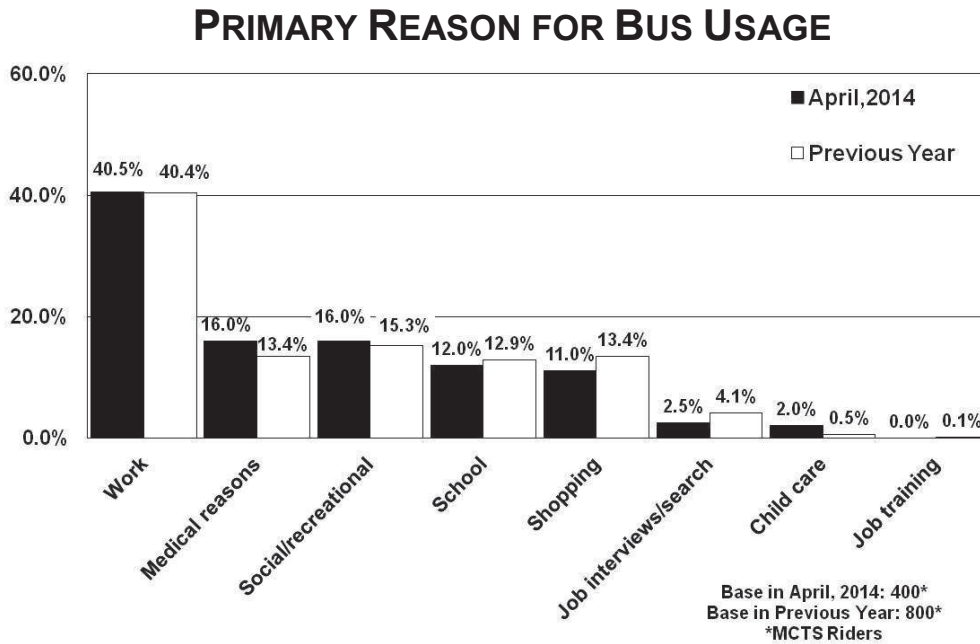
Almost one-of-four MCTS riders (23.8%) said they always have alternative choices to using the bus this wave. Thirty-one (30.5%) have alternatives either most or half of the time. Twenty-three percent (23.3%) have just some alternatives to the bus, and the rest (17.3%) rarely have alternative transportation choices to using the bus.

RIDERSHIP PROFILE

Management Decisions, Inc.



In April, 2013 riding the bus for social/recreational (67.3%) was the most cited of all reasons for using the bus, which is a significant increase compared to the previous year (59.8%). This wave, shopping (64.0%) was the second most cited reason. Medical reasons (57.0%) were the third most mentioned reason. Work was also frequently cited by riders.

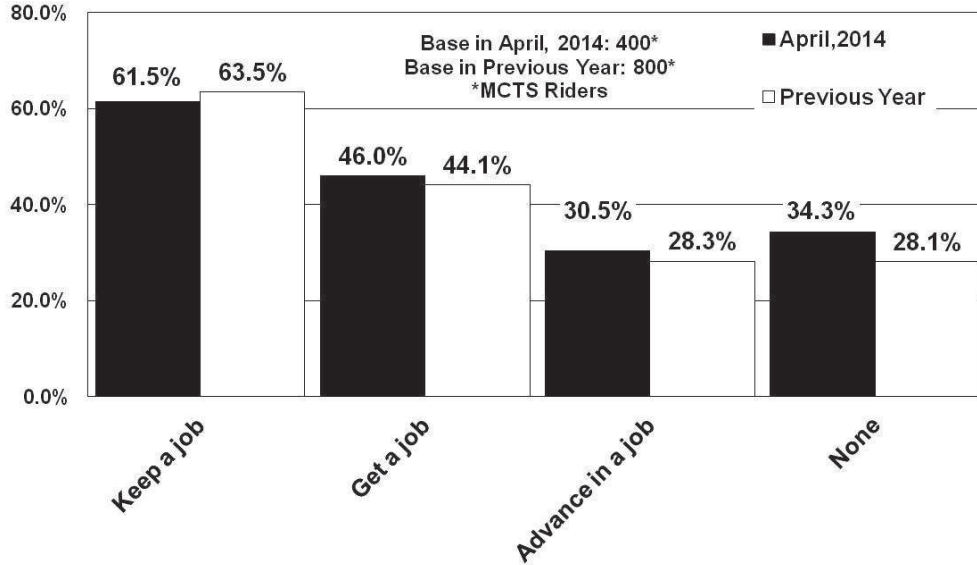


Of all the reasons for using the bus, four-in-ten riders (40.5%) in April, 2014 said they primarily use the bus for transportation to and from work, the same as the previous year (40.4%). Medical reasons (16.0%) were the second most cited primary reason, followed

RIDERSHIP PROFILE

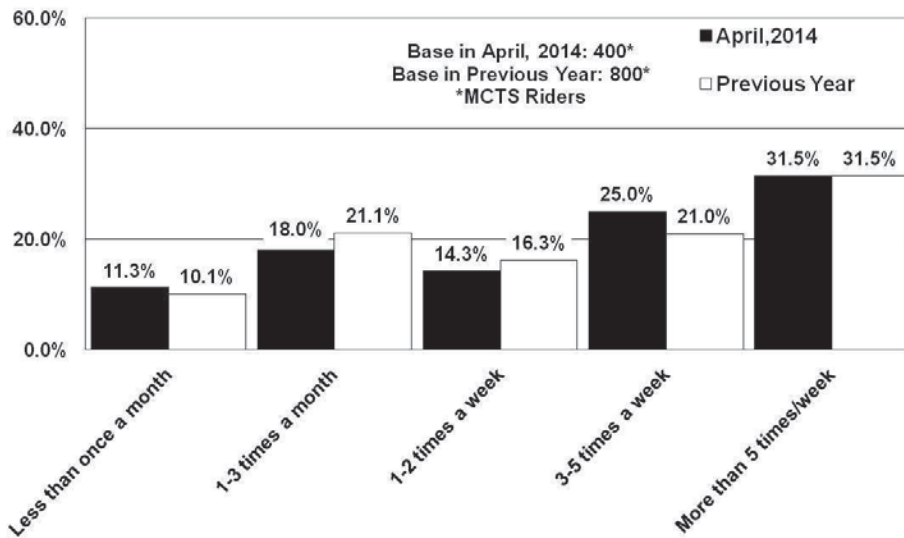
by social or recreational activities (16.0%) and school (12.0%), statistically similar to the previous year.

HELPED BY BUS SERVICE



Sixty-two percent (61.5%) of all MCTS riders in April, 2014 said the bus has helped them keep a job, a lower percentage than the previous year (63.5%). Forty-six percent (46.0%) said the bus has helped them get a job, higher than the previous year (44.1%). Thirty-one percent (30.5%) mentioned advancing in their jobs, also higher than the previous year (28.3%).

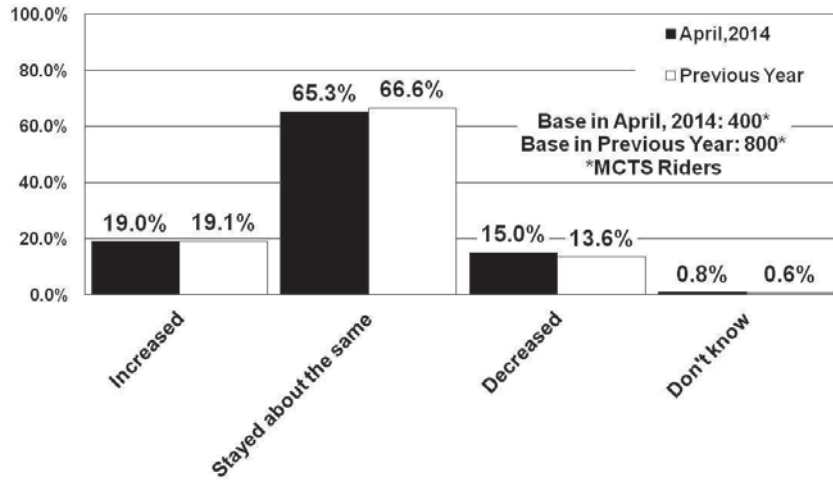
TIMES RIDDEN IN LAST THREE MONTHS



Thirty-two percent (31.5%) of riders in April, 2013 reported using the bus more than five times a week, the same as the previous year (31.5%). Twenty-five percent (25.0%) ride three to five times a week, higher than the previous year (21.0%).

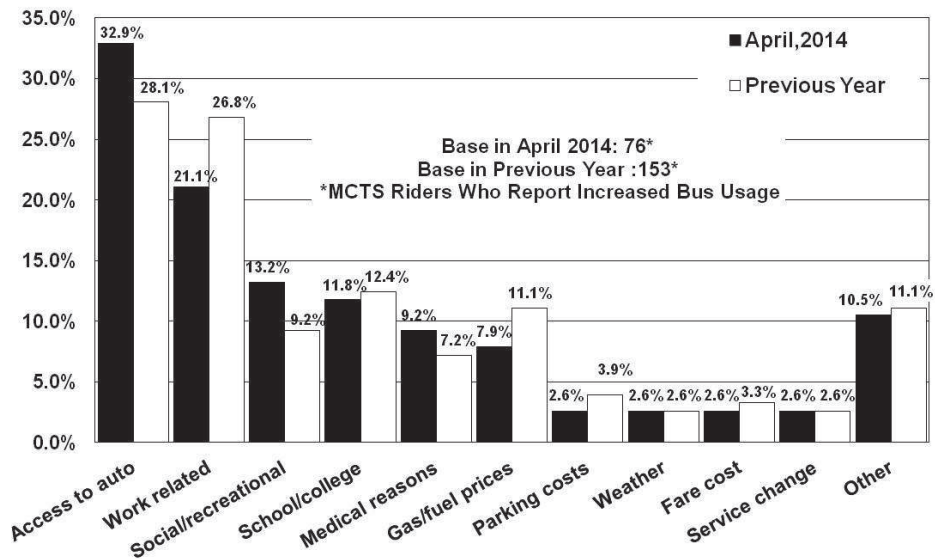
RIDERSHIP PROFILE

BUS USAGE IN LAST THREE MONTHS



The number of riders stating that bus usage increased (19.0%) in April, 2014, is the same as the previous year (19.1%). Sixty-five percent (65.3%) said their bus usage stayed about the same during the last three months, statistically the same as the previous year (66.6%). Fifteen percent (15.0%) said their bus usage decreased, which is about the same as the previous year (13.6%).

REASONS BUS USAGE INCREASED IN LAST THREE MONTHS

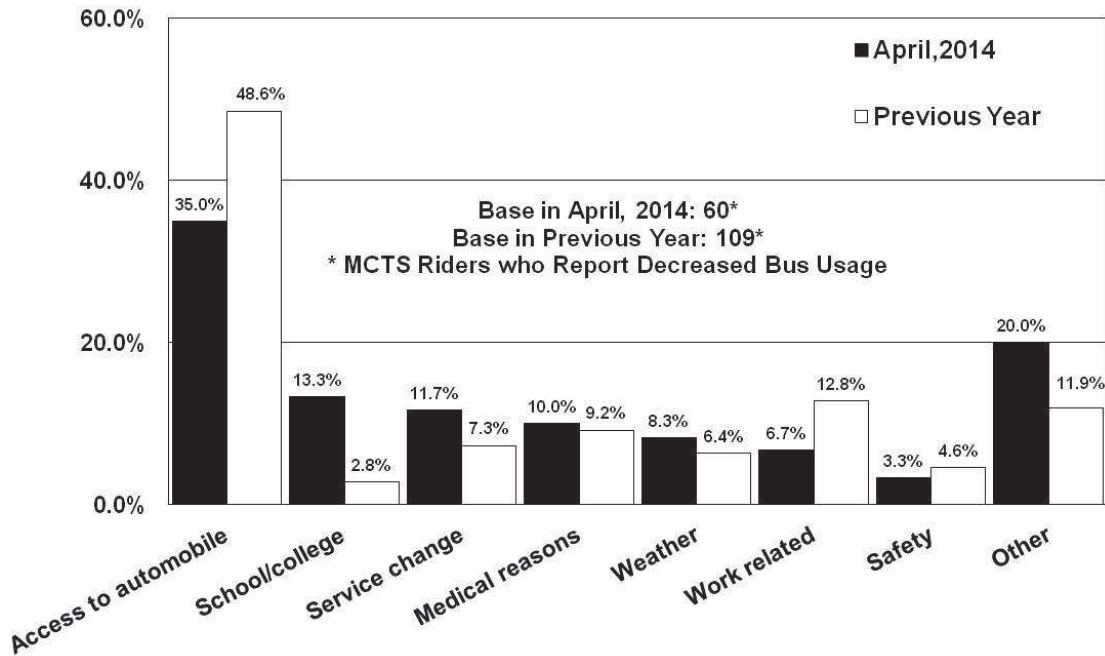


In April, 2014 when asked why bus usage has increased in the last three months, not having access to an automobile (32.9%) was the most cited reason, a slight increase compared to the previous year (28.1%). Work related reasons were the second-most cited reason (21.1%) in April, 2014, which was lower than the previous year (26.8%), and reflected the largest differential. The number of riders who increased bus usage due to social and recreational reasons increased to thirteen percent (13.2%) from nine percent (9.2%).

Warning: base sizes are very small

RIDERSHIP PROFILE

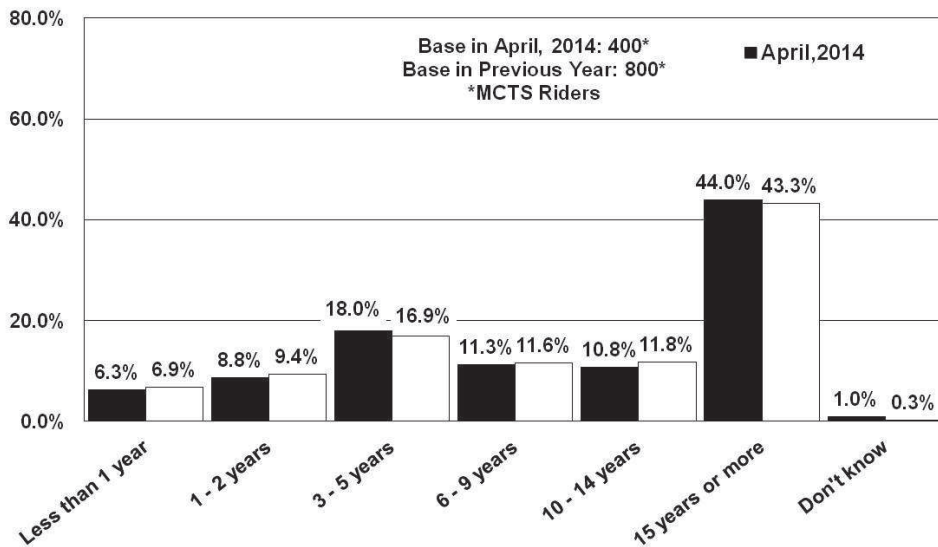
REASONS BUS USAGE DECREASED IN LAST THREE MONTHS



When asked why their bus usage decreased, the reason mentioned most was access to an automobile (35.0%) which is lower compared to the previous year (48.6%).

Warning: base sizes are very small

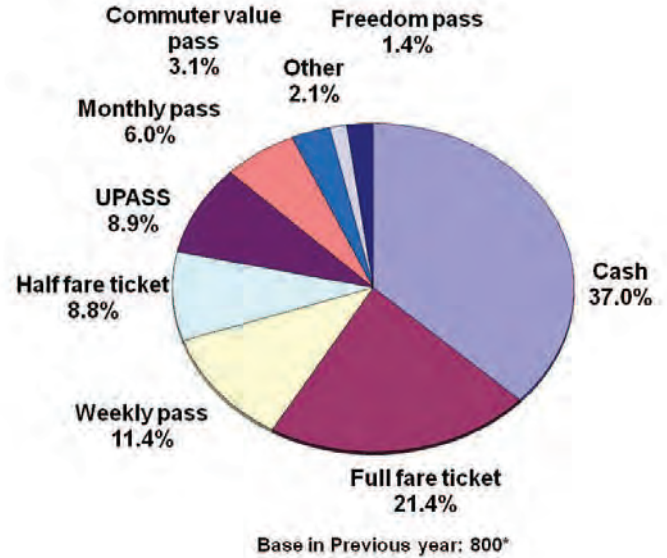
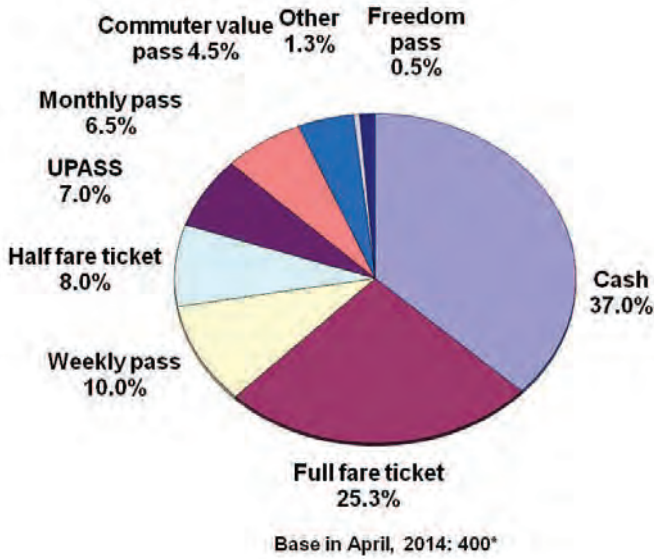
YEARS USING MCTS FOR TRANSPORTATION NEEDS



Forty-four percent (44.0%) have been using MCTS for 15 years or more, which shows no significant change from the previous year (43.3%). In April, 2014 four-in-ten riders (40.1%) have been riding three to fourteen years. Fifteen percent (15.1%) have been riding for two years or less.

RIDERSHIP PROFILE

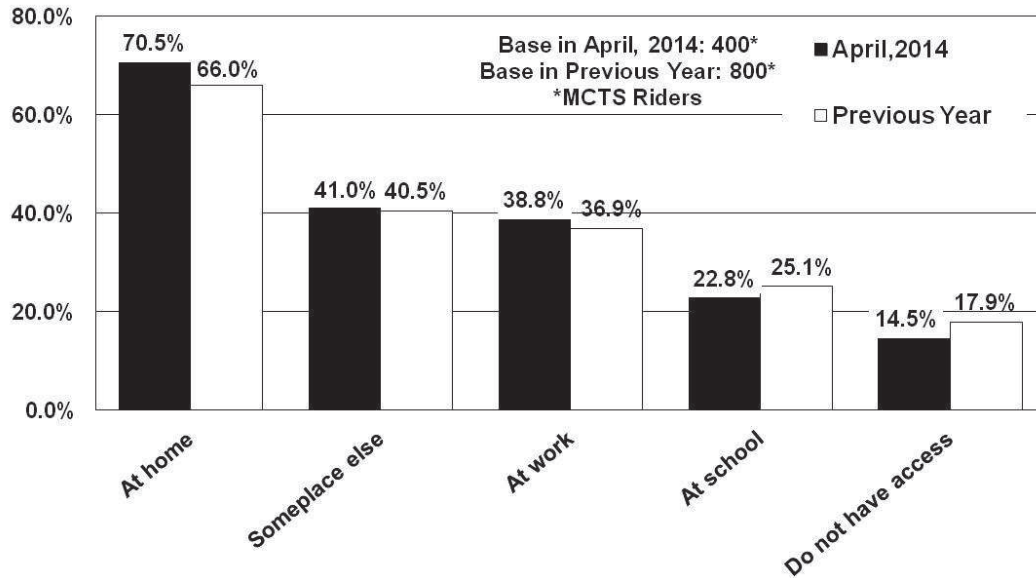
HOW FARE IS NORMALLY PAID



*MCTS Riders

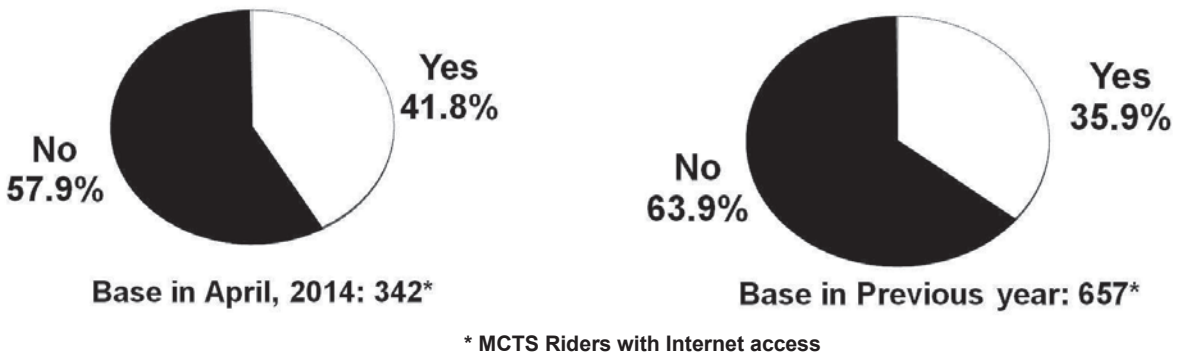
Cash continues to be the preferred method of payment for riding the bus and was mentioned by thirty-five percent (37.0%) of the riders. Full fare tickets continue to be the next most used payment method at twenty-five percent (25.3%). Other riders typically purchased a weekly pass (10.0%), half fare tickets (8.0%), a UPASS (7.0%), or a monthly pass (6.5%). The use of Commuter Value Passes showed an increase in April, 2014 to five percent (4.5%) from the previous year's three percent (3.1%).

ACCESS TO THE INTERNET



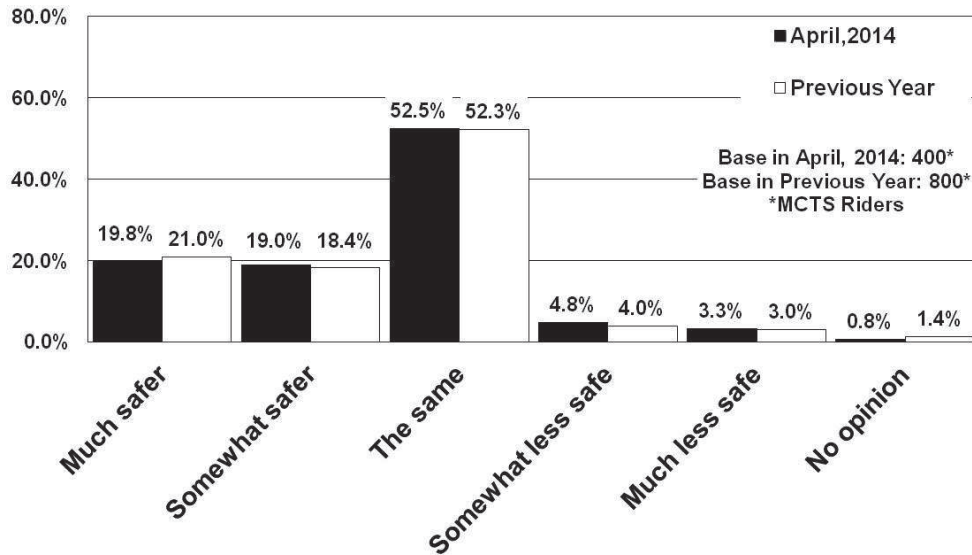
In April, 2014 fifteen percent (14.5%) of the riders do not have internet access, a decrease from the previous year (17.9%). Access to the internet from home was mentioned the most (70.5%), similar to the previous year (66.0%). Access to the internet from someplace else was the second most mentioned place (41.0%), with access at work (38.8%) ranking third.

VISITED MCTS WEB SITE IN THE LAST MONTH



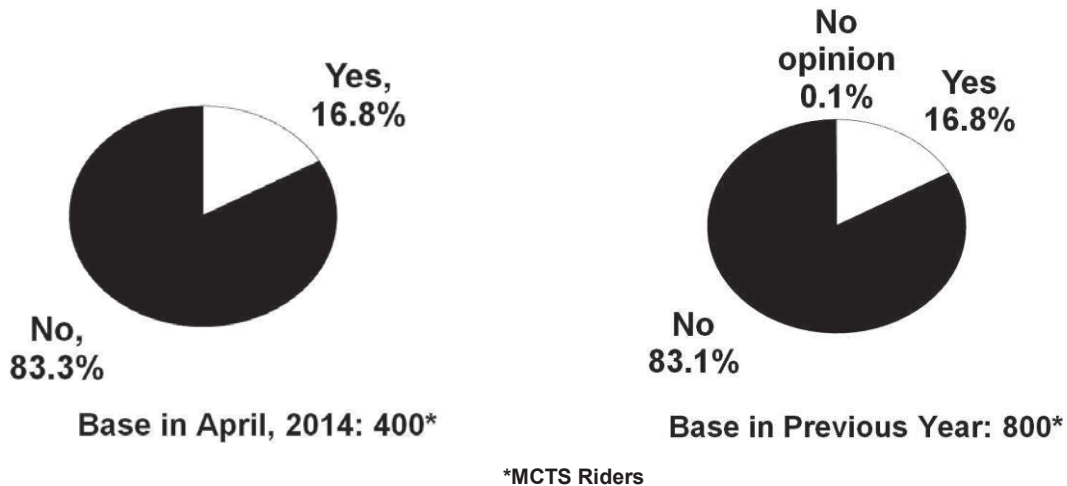
For those having internet access, more riders this wave said they had visited the MCTS web site within the last month (41.8%) than had the previous year (35.9%).

PERSONAL SAFETY



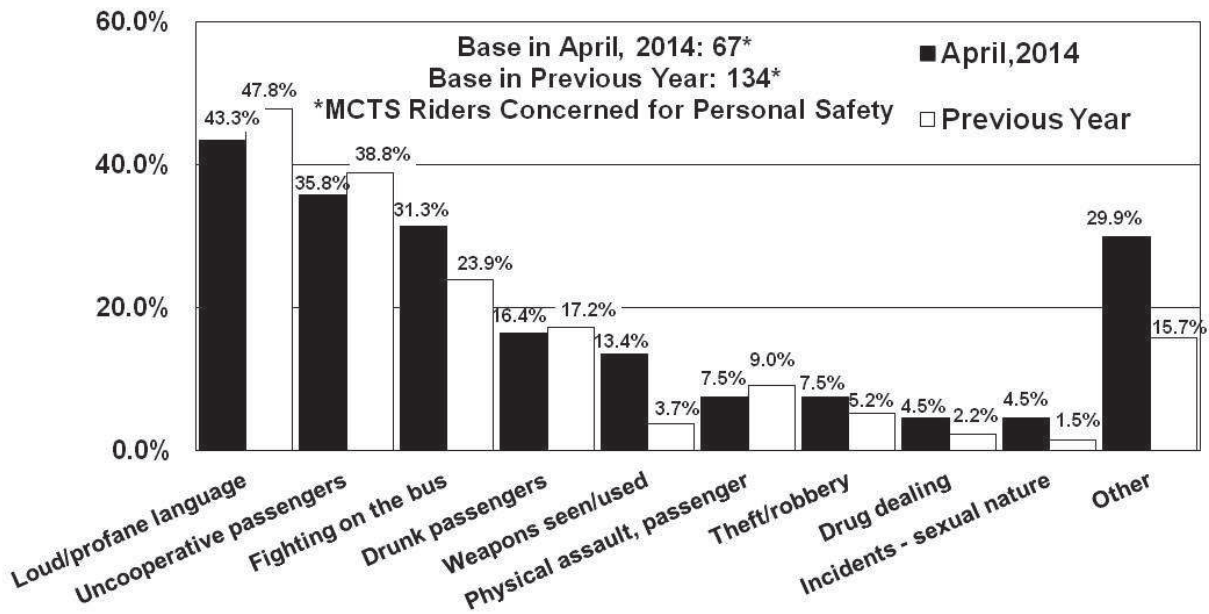
Between April, 2014 and the previous year, responses are statistically similar with regard to their own safety during the last six months. In the current wave, thirty-nine percent (38.8%) of riders said they felt somewhat or much safer during the last six months. Only eight percent (8.1%) said they felt somewhat less safe or much less safe.

CONCERN FOR PERSONAL SAFETY/SECURITY



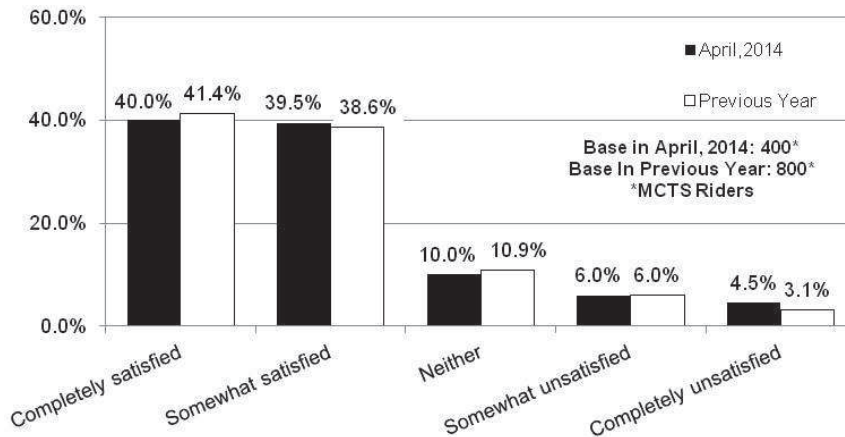
Sixteen percent (16.8%) of the riders this wave said they witnessed an event that made them concerned for their own personal safety or security when riding the bus in the last six months, the same as the previous year (16.8%).

REASON FOR SAFETY/SECURITY CONCERN



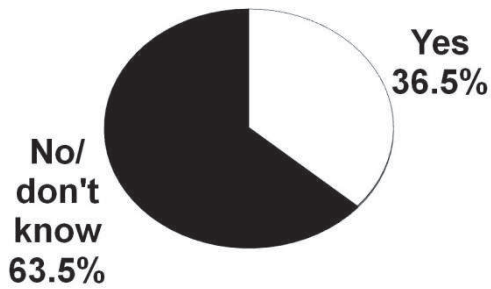
Of the riders who felt concern for their safety/security, forty-three percent (43.3%) cited loud or profane language as one of their reasons for concern, a slight decrease over the previous year (47.8%). Thirty-six percent (35.8%) of the riders cited uncooperative passengers as a reason for feeling unsafe. *Warning: base size is very small.*

SATISFACTION WITH SECURITY MEASURES

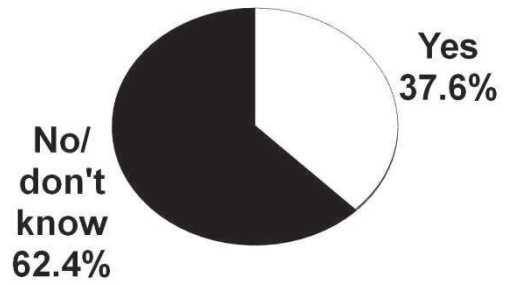


Eighty percent (79.5%) of the MCTS riders this wave are either completely satisfied or somewhat satisfied with the current security measures in place, which is equal to the previous year (80.0%). Dissatisfaction with security measures was reported as somewhat unsatisfied by six percent (6.0%) of riders, while five percent (4.5%) are completely unsatisfied with the security measures. *New question added April 2012*

RIDER INSIDER AWARE



Base in April, 2014: 400*

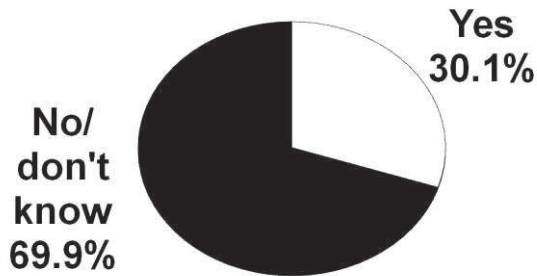


Base in Previous Year: 800*

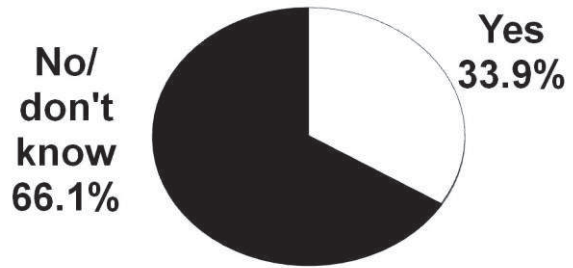
*MCTS Riders

More than one third (36.5%) of MCTS riders in April, 2014 were aware of the Rider Insider relationship marketing program, statistically the same as the previous year (37.6%).

SIGNED UP FOR RIDER INSIDER



Base in April, 2014: 146*

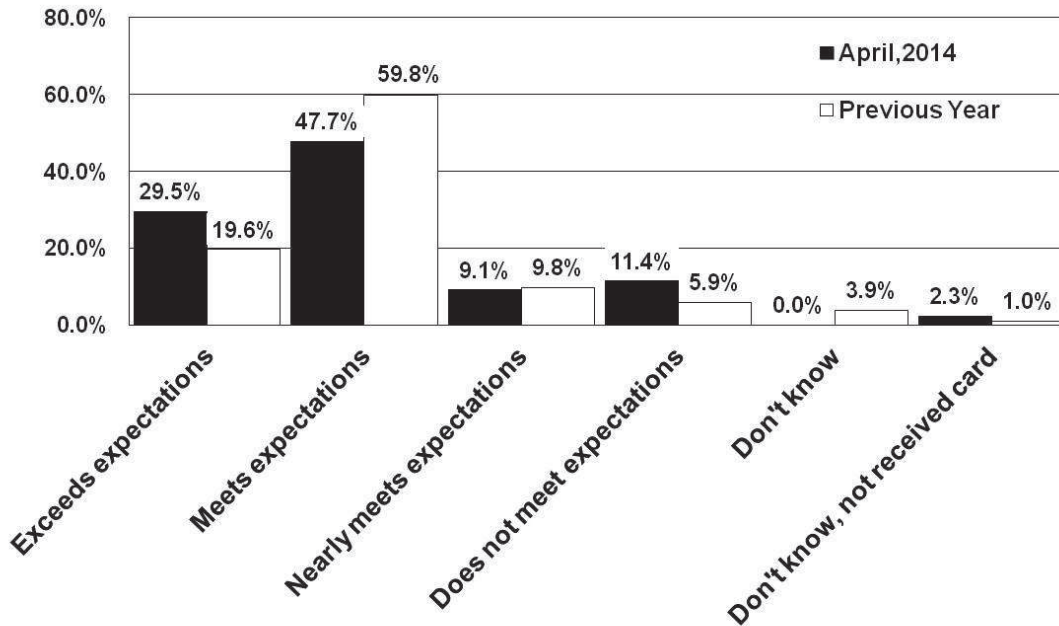


Base in Previous Year: 301*

*MCTS Riders who are Aware of Rider Insider

Thirty percent (30.1%) of MCTS riders who were aware of the Rider Insider program signed up for the program, slightly less than the previous year (33.9%).

OVERALL SATISFACTION WITH RIDER INSIDER



Base in April, 2014: 44*
 Base in Previous Year: 102*
 *MCTS Riders who Signed Up for Rider Insider

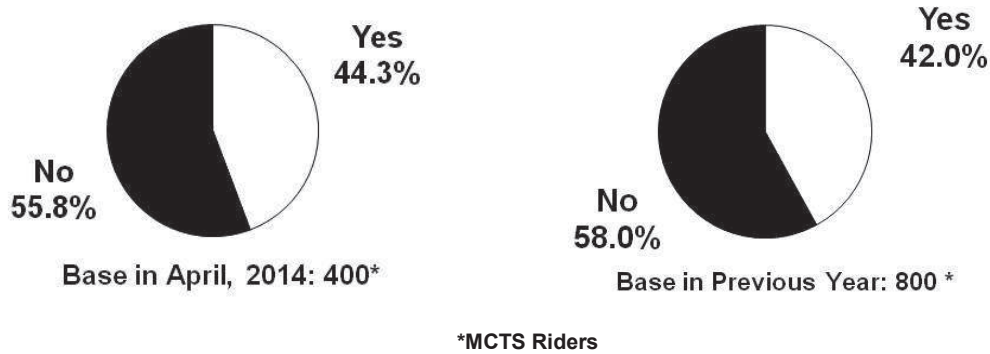
Seventy-seven percent (77.2%) of the Rider Insider participants said the program meets their expectations or exceeds their expectations, which is a decrease from the previous year (79.4%). Nine percent (9.1%) in April, 2104 said the program nearly meets their needs, similar to the previous wave (9.8%). This wave, eleven percent (11.4%) said it does not meet their expectations, which is higher compared to the previous year (5.9%).

Warning: base size is very small.

TELEPHONE INFORMATION

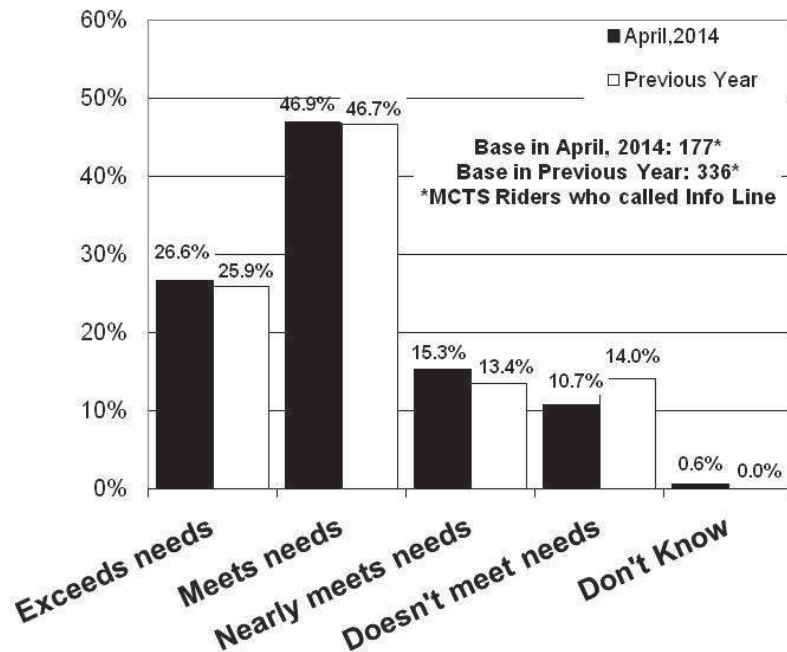
Management Decisions, Inc.

CALLED INFORMATION LINE



Forty-four percent (44.3%) this wave said they had called the MCTS Telephone Information Line since January 1st of this year compared to forty-two percent (42.0%) in the previous year.

EASE GETTING TELEPHONE INFORMATION

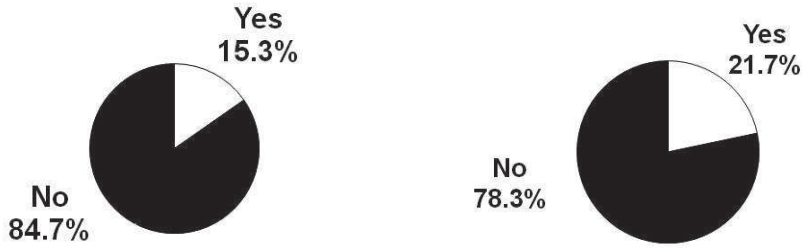


Of those riders who called the Telephone Information Line in April, 2014, seventy-four percent (73.5%) said the ease of getting telephone information exceeds (26.6%) or meets (46.9%) their needs, an increase compared to the previous year (72.6%). Fifteen percent (15.3%) stated the ease of getting information nearly meets their needs, and eleven percent (10.7%) said getting information doesn't meet their needs; with the former showing a slight increase and the later a decrease compared to the previous year.

TELEPHONE INFORMATION

Management Decisions, Inc.

PROBLEMS FINDING/RECEIVING INFORMATION



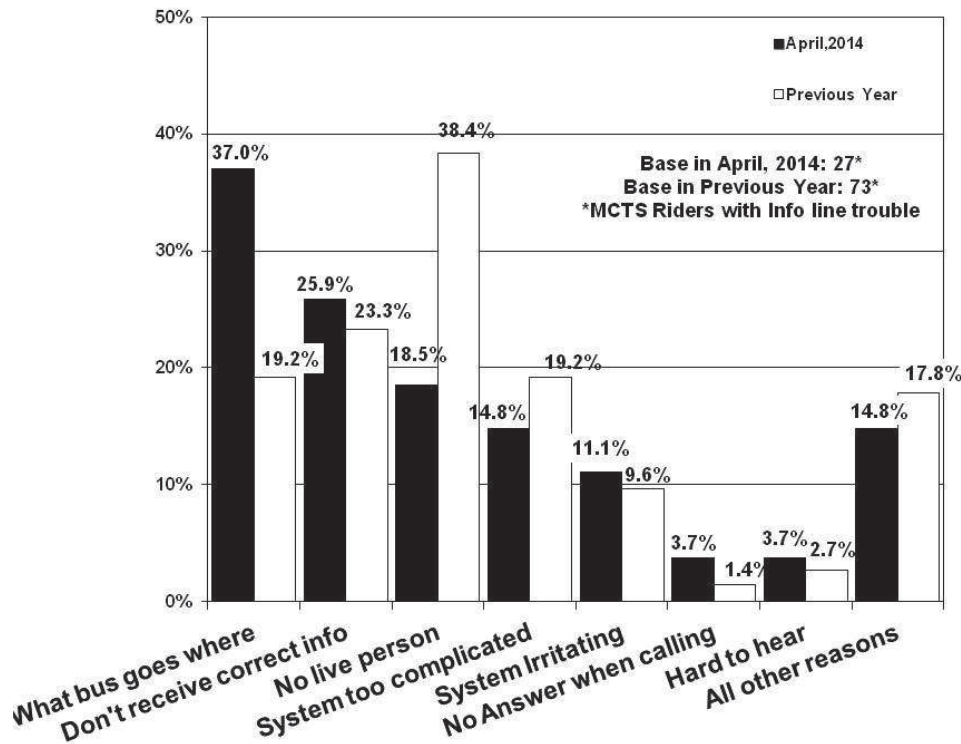
Base in April, 2014: 177*

Base in Previous Year: 336*

*MCTS Riders who called info line

This wave, eighty-five percent (84.7%) of riders who called the information line said they did not have any problems finding or receiving information, which is an increase compared to the previous year (78.3%). Fifteen percent (15.3%) said yes, they did have difficulty finding or receiving information, which is a decrease compared to the previous year (21.7%).

WHAT PROBLEMS



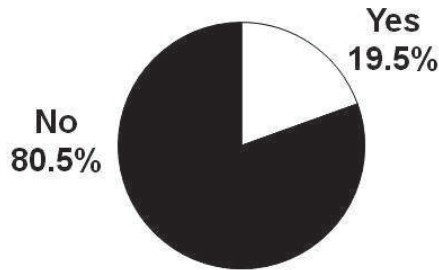
Trying to find out what bus goes where (37.0%) was the main problem MCTS riders calling the Information Line had, which was an increase to the prior year where nineteen percent (19.2%) cited that as an issue. There was a *statistically significant* decrease in the percentage of riders mentioning no live person as a problem in April, 2014 (18.5%) compared to the previous year (38.4%)

Warning: base size is very small.

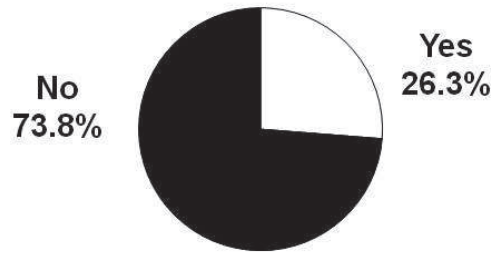
RIDING HABITS

Management Decisions, Inc.

RIDING HABIT CHANGE



Base in April, 2014: 400 *

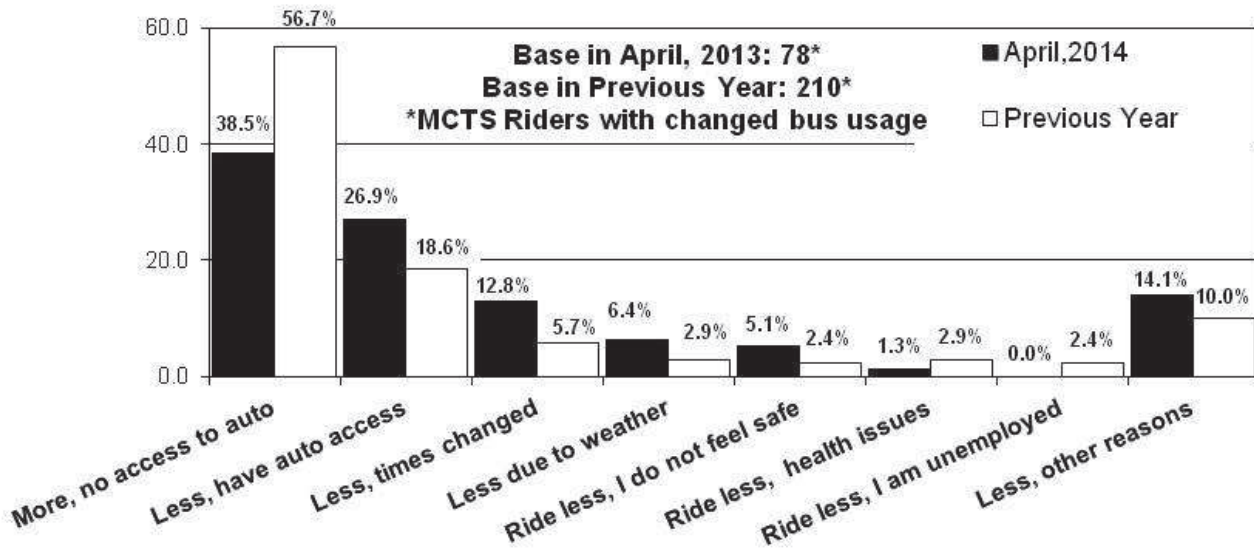


Base in Previous Year: 800 *

*MCTS Riders

In April, 2014 twenty percent (19.5%) said yes their riding habits or bus usage had changed since January 1st of the year, lower than the previous year (26.3%). Reversely, eighty-one percent (80.5%) said no, their riding habits or bus usage had not changed since January 1st of the year, more than the previous year (73.8%).

HOW THEY CHANGED

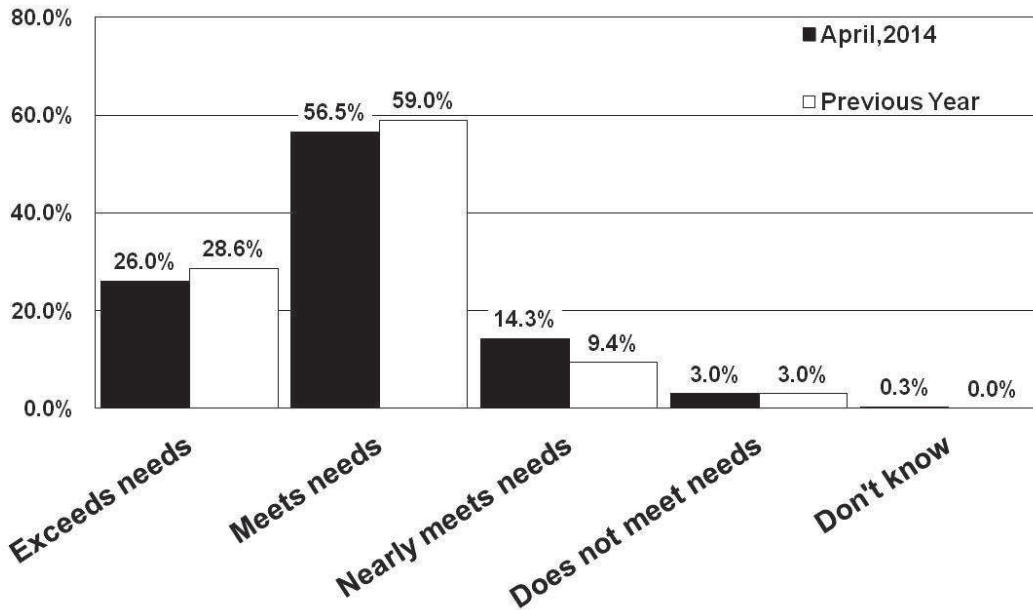


In April, 2014 *significantly* less MCTS riders, whose habits have changed, ride the bus more due to not having access to an automobile (38.5%), compared to the previous year (56.7%).

EVALUATION SUMMARY

Management Decisions, Inc.

OVERALL, WOULD YOU SAY THE MILWAUKEE COUNTY TRANSIT SYSTEM...



Base in April, 2014: 400*
 Base in Previous Year: 800*
 *MCTS Riders

For the April, 2014 wave of MCTS rider interviews, eighty-three percent (82.5%) of the riders reported having their overall bus service needs either met or exceeded by the Milwaukee County Transit System, down slightly compared to the previous year (87.6%). Reversely, those whose needs are nearly met or not met, taken together, have increased between this wave and the previous year (17.3% vs. 12.4%). On average though, the score for this wave (3.06) is quite similar to the previous year's score (3.13).

In addition to their overall satisfaction, riders were also asked about 27 individual aspects of general bus service. They were asked to rate each aspect on a 4-point scale where "4" means that their needs were exceeded, "3" means their needs were met, "2" means their needs were nearly met and "1" means their needs were not met at all. In Tables 2 and 3, each aspect is listed with the corresponding "Average Quality" (mean score) and percentage of riders who felt their needs were NOT met ("1" or "2" on the 4-point scale) for April, 2014 and the previous year. The tables are ranked in descending order by "Average Quality". Of all 27 aspects, the top ten rated aspects, starting with the best, are: "The drivers' appearance", "How safely they drive the bus", "How often the drivers know the answers to people's questions", "How well buses are air-conditioned in the summer", "How well buses are heated in winter", "How good drivers are in helping people make connections", "How helpful drivers are", "The ease of getting passes and tickets", "How friendly drivers are", and "The ease of understanding printed schedules". All of the above scored the highest "Average Quality" ratings and had some of the lowest "Needs Not Met" percentages. In general, the driver's aspects of appearance, safe driving and being helpful, along with heated/air conditioned buses are usually rated highly by the riders.

EVALUATION SUMMARY

The ten aspects having the lowest “Average Quality” scores and highest “Needs Not Met” percentages in the April, 2014 wave, starting with the worst, are: “The availability of night service”, “The location of bus shelters”, “The cleanliness of bus shelters”, “The availability of weekend service”, “How good the drivers are in waiting for people running for the bus”, “Presence of adequate security measures on the buses”, “The buses not being late” “The frequency of service or time between buses”, “The buses not being early”, and “How often a seat is available”. Although the order has changed, these aspects being at the bottom of the rating list is consistent with previous years.

When comparing April, 2014 with the previous year overall, only 2 of the 27 general bus service aspects experienced a better “Average Quality” rating and a better “Needs Not Met” percentage. Starting with the highest ranked aspect for “Average Quality”, they are: “The ease of getting printed schedules”, and “The availability of weekend service”.

Nineteen of the aspects had both worse “Average Quality” ratings and worse “Needs Not Met” percentages this wave compared to the previous year, starting with the lowest ranked aspect by “Average Quality”, they are: “The availability of night service”, “The cleanliness of bus shelters”, “How good the drivers are in waiting for people running for the bus”, “Presence of adequate security measures on the buses”, “Buses not being late”, “The frequency of service or time between buses”, “Buses not being early”, “How often a seat is available”, “Getting to your destination without transferring”, “How clean buses are on the inside”, “The speed or travel time of buses”, “How clean the buses are on the outside”, “How often buses break down”, “How friendly drivers are”, “How helpful drivers are”, “How good drivers are in helping people make connections”, “How well buses are heated in the winter”, “How well buses are air-conditioned in the summer”, and “The driver’s appearance”.

EVALUATION SUMMARY

Management Decisions, Inc.

TABLE 2 April, 2014 Bases vary by aspect; total possible base = 400	Average Quality (4-pt. Scale)	Needs Not Met
The drivers' appearance	3.29	4.8%
How safely they drive the bus	3.26	7.0%
How often the drivers know the answers to people's questions	3.21	12.0%
How well buses are air conditioned in summer	3.20	9.3%
How well buses are heated in winter	3.16	10.8%
How good drivers are in helping people make connections	3.16	14.8%
How helpful drivers are	3.15	14.3%
The ease of getting passes and tickets	3.12	11.3%
How friendly drivers are	3.06	19.3%
The ease of understanding printed schedules	3.05	13.3%
The ease of getting printed schedules	3.05	16.0%
How often buses break down	3.02	20.0%
How clean buses are on the outside	3.01	14.3%
The walking distance to and from bus stops	2.98	17.0%
The speed or travel time of buses	2.92	19.8%
How clean buses are on the inside	2.91	22.8%
Getting to your destination without transferring	2.85	24.5%
How often a seat is available	2.84	26.8%
The buses not being early	2.71	31.0%
The frequency of service or time between buses	2.66	34.5%
The buses not being late	2.66	35.0%
Presence of adequate security measures on the buses	2.64	32.8%
How good the drivers are in waiting for people running for the bus	2.60	41.0%
The availability of weekend service	2.55	34.5%
The cleanliness of bus shelters	2.54	37.8%
The location of bus shelters	2.54	38.5%
The availability of night service	2.52	32.3%

EVALUATION SUMMARY

Management Decisions, Inc.

<p style="text-align: center;">TABLE 3 Previous Year (April, 2013 - October, 2013) Bases vary by aspect; total possible base = 800</p>	<p style="text-align: center;">Average Quality (4-pt. Scale)</p>	<p style="text-align: center;">Needs Not Met</p>
The drivers' appearance	3.33	4.0%
How safely they drive the bus	3.31	8.1%
How well buses are air conditioned in summer	3.26	8.8%
How helpful drivers are	3.25	11.0%
How well buses are heated in winter	3.23	8.5%
How often the drivers know the answers to people's questions	3.20	11.9%
How often buses break down	3.18	13.6%
How clean buses are on the outside	3.17	10.1%
How good drivers are in helping people make connections	3.17	13.9%
The ease of getting passes and tickets	3.15	11.5%
How friendly drivers are	3.10	17.0%
The ease of understanding printed schedules	3.05	16.0%
The ease of getting printed schedules	3.02	17.9%
The speed or travel time of buses	3.01	16.9%
How often a seat is available	3.00	20.8%
The walking distance to and from bus stops	2.99	18.5%
How clean buses are on the inside	2.96	22.0%
Getting to your destination without transferring	2.89	22.4%
Presence of adequate security measures on the buses	2.82	24.5%
The buses not being late	2.80	29.5%
The buses not being early	2.77	27.6%
How good the drivers are in waiting for people running for the bus	2.73	35.6%
The frequency of service or time between buses	2.69	33.1%
The availability of night service	2.61	28.6%
The cleanliness of bus shelters	2.59	37.0%
The location of bus shelters	2.57	39.3%
The availability of weekend service	2.50	37.9%

RATINGS

Management Decisions, Inc.

Riders were asked to rate the Milwaukee County Transit System on 27 varying bus aspects by whether the bus system exceeds their needs, meets their needs, nearly meets their needs or does not meet their needs. Each of the ratings has been assigned a number to create a 4-point scale where “4” means that their needs were exceeded, “3” means their needs were met, “2” means their needs were nearly met and “1” means their needs were not met. The average or mean score is defined as “Average Quality.”

Those riders who stated that their needs were either nearly met or not met (“1” or “2” on the 4-point scale) are considered to have their needs NOT met.

Each of the individual bus aspects has been categorized into one of the following five groups:

- ◆ Ratings related to the Bus Driver (9 aspects)
- ◆ Ratings related to Bus Equipment (6 aspects)
- ◆ Ratings related to Bus Service (8 aspects)
- ◆ Ratings related to Bus Information and Schedule (3 aspects)
- ◆ Ratings related to Bus Security (1 aspect)

The following tables and charts present the specific aspects by the five groups providing the “Average Quality” and percentage of those whose needs were not met for April, 2014, October, 2013 and April, 2013.

All tables also include the “Average Importance” ratings on each bus aspect from the first four survey waves (July, 1995 - April, 1996). These averages or mean scores are based on a 5-point scale in which “5” means very important and “1” means not at all important. The tables and charts are ranked in descending order by “Average Importance.” Aspects missing “Average Importance” ratings were added to the study after April, 1996.

Any *significant* changes (at the 95% confidence level) between wave pairs, e.g., October, 2013 & April, 2013; October, 2013 & April, 2014 are identified in the tables by shadings and underlining. A shaded box marks an “Average Quality” rating or “Needs Not Met” percentage that is *significantly* higher than the preceding wave. An underlined rating or percentage signals a shift *significantly* lower.

Sometimes changes are gradual over time. A series of waves may show a trend higher or lower for a specific aspect that may not be *significant* when looking at wave-to-wave differences but the change from the oldest wave to most recent may be *significant*. This type of *significant* change will not be featured in the shading or underlining, but it would be discussed in the text that explains the table.

When comparing previous waves to more recent, remember an increase in the “Average Quality” and/or a decrease in the “Needs Not Met” percentage for a specific aspect shows improvement.

RATINGS

Management Decisions, Inc.

While every respondent was asked to rate all 27 individual bus aspects, in some instances respondents were not able to furnish a rating for one or more aspects. Please note that in this report the non-responses are excluded from the “Average Quality” calculations. Bases do vary.

<u>Total Possible Base</u>	
April, 2014	400
October, 2013	400
April, 2013	400

BUS DRIVER

Six of the nine bus driver aspects rank among the top ten aspects and three are in the bottom ten (refer to Evaluation Summary – Table 2) “Drivers’ appearance”, the least important in “Average Importance” (4.15/5-points) ranked first in “Average Quality” this wave. The most important aspect in “Average Importance” (4.83/5-points) “How safely they drive the bus”, ranked second in “Average Quality”.

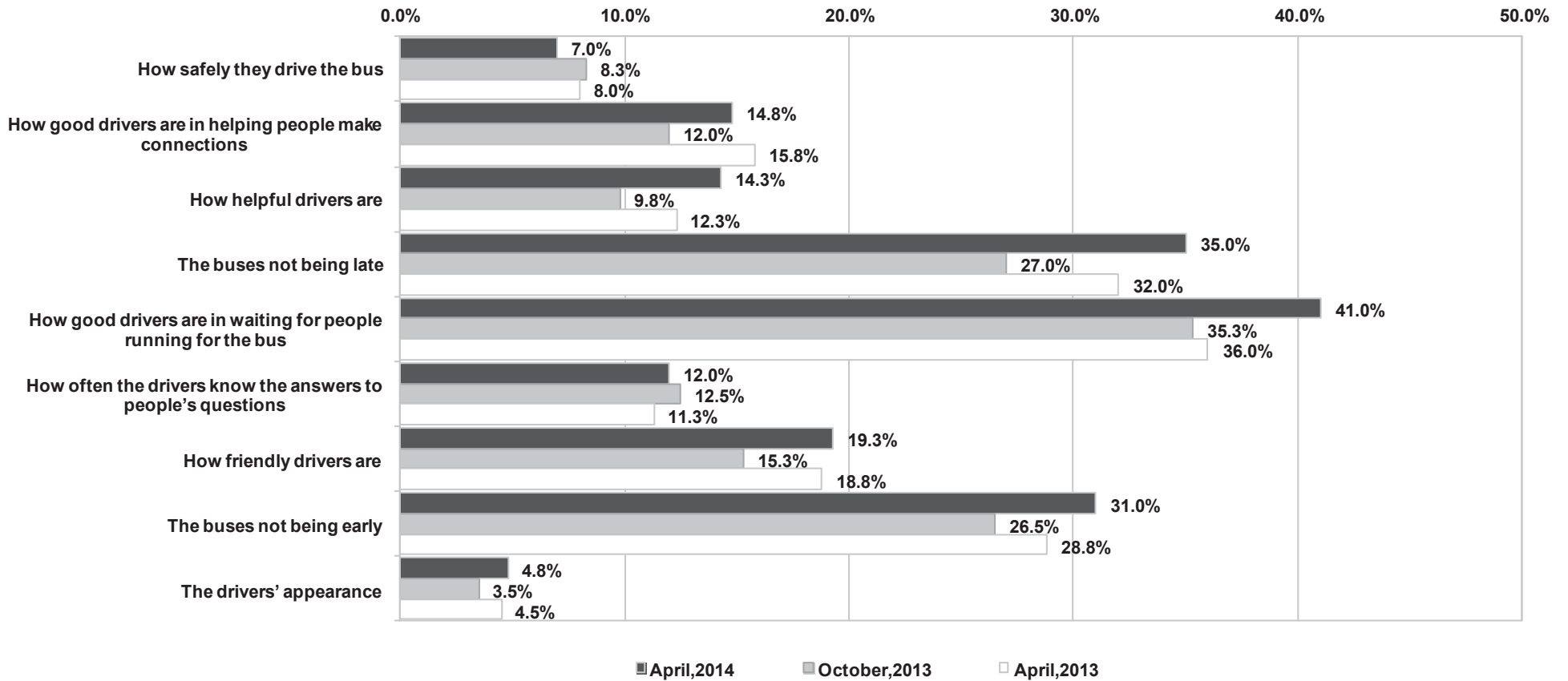
The same three bus driver aspects again rank among the *bottom* ten rated bus aspects; “Drivers waiting for people running for the bus”, is the fifth worst ranking of all 27 aspects, “Buses not being late” ranked seventh worst and “Buses not being early” ranked ninth worst.

Riders said that the drivers announced streets and transfer corners seventy-eight percent (77.5%) of the time which is about the same compared to the prior year (73.9%). In April, 2014 eighteen percent (17.8%) said the drivers did not announce them.

	Average Import. (5-pt. Scale)	April,2014		October,2013		April,2013	
		Average Quality (4-pt. Scale)	Needs Not Met	Average Quality (4-pt. Scale)	Needs Not Met	Average Quality (4-pt. Scale)	Needs Not Met
How safely they drive the bus	4.83	3.26	7.0%	3.30	8.3%	3.32	8.0%
How good drivers are in helping people make connections	4.59	3.16	14.8%	3.21	12.0%	3.13	15.8%
How helpful drivers are	4.58	<u>3.15</u>	14.3%	3.29	<u>9.8%</u>	3.22	12.3%
The buses not being late	4.51	<u>2.66</u>	35.0%	2.84	<u>27.0%</u>	2.76	32.0%
How good drivers are in waiting for people running for the bus	4.48	<u>2.60</u>	41.0%	2.75	35.3%	2.71	36.0%
How often the drivers know the answers to people’s questions	4.46	3.21	12.0%	3.19	12.5%	3.21	11.3%
How friendly drivers are	4.28	3.06	19.3%	3.14	15.3%	3.06	18.8%
The buses not being early	4.26	2.71	31.0%	2.81	26.5%	2.73	28.8%
The drivers’ appearance	4.15	<u>3.29</u>	4.8%	3.38	3.5%	<u>3.28</u>	4.5%

BUS DRIVER

Percent Needs Not Met

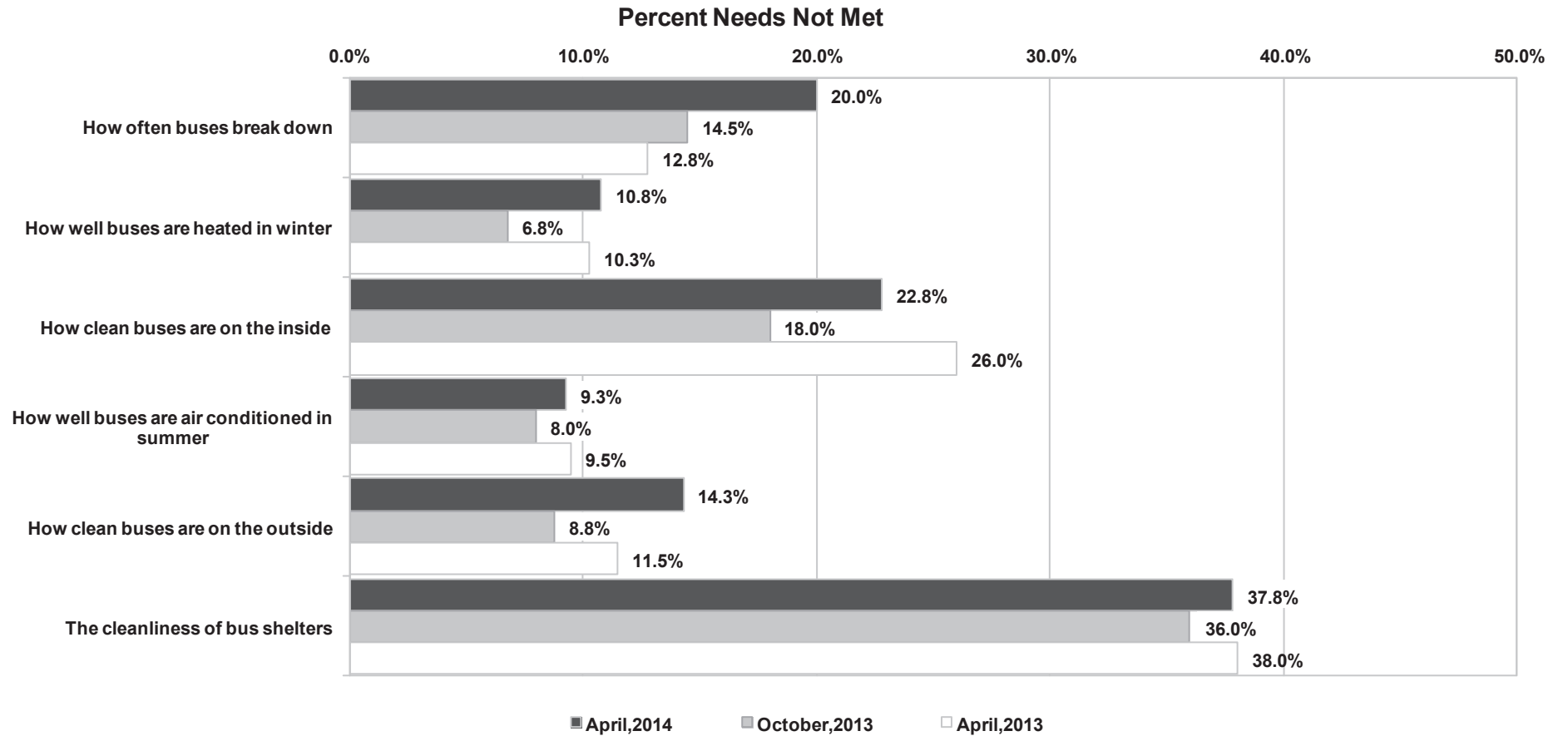


BUS EQUIPMENT

The most important bus equipment aspect “How often buses break down”, was not ranked in the top or bottom ten aspect ratings for “Average Quality” (refer to the Evaluation summary – Table 2), but ranked twelfth. “How well buses are air conditioned in summer”, was the second highest rated aspect in “Average Quality” this wave. “How clean buses are on the outside” was the fourth highest ranked aspect of all 27 aspects. “The availability of night service” continues to be the lowest ranked bus equipment aspect in “Average Quality” this wave replacing “The availability of weekend service” from the previous year.

	Average Import. (5-pt. Scale)	April,2014		October,2013		April,2013	
		Average Quality (4-pt. Scale)	Needs Not Met	Average Quality (4-pt. Scale)	Needs Not Met	Average Quality (4-pt. Scale)	Needs Not Met
How often buses break down	4.68	<u>3.02</u>	20.0%	3.17	<u>14.5%</u>	3.19	<u>12.8%</u>
How well buses are heated in winter	4.54	<u>3.16</u>	10.8%	3.27	<u>6.8%</u>	3.19	10.3%
How clean buses are on the inside	4.34	<u>2.91</u>	22.8%	3.02	<u>18.0%</u>	2.90	<u>26.0%</u>
How well buses are air conditioned in summer	4.29	3.20	9.3%	3.30	8.0%	3.22	9.5%
How clean buses are on the outside	3.36	<u>3.01</u>	14.3%	3.20	<u>8.8%</u>	3.14	11.5%
The cleanliness of bus shelters	-	2.54	37.8%	2.62	36.0%	2.56	38.0%

BUS EQUIPMENT



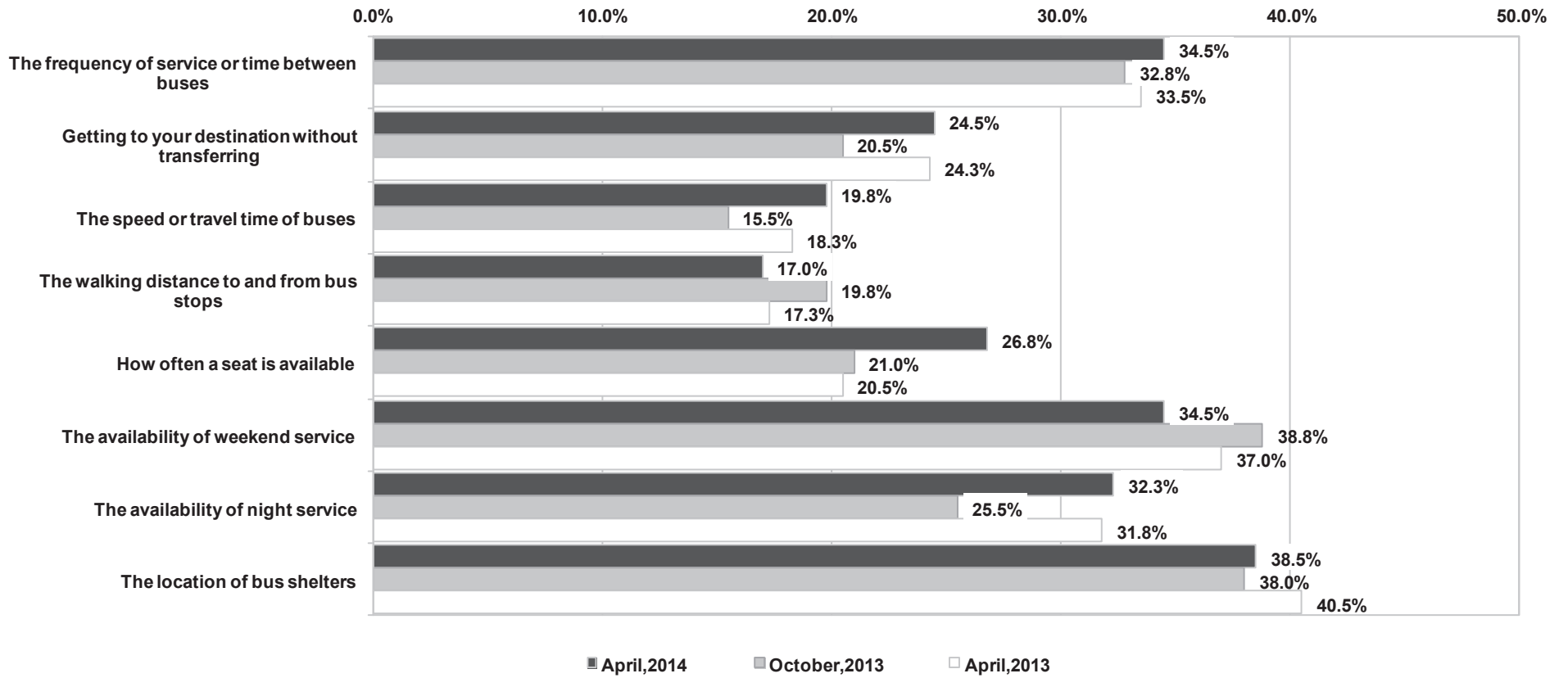
BUS SERVICE

The eight aspects covering bus service historically have ranked at the bottom of the average quality rankings (refer to Evaluation summary – Table 2) and the April, 2014 wave was no different. Five of the aspects placed in the bottom ten. “Availability of night service”, “Location of bus shelters”, “Availability of weekend service”, “Frequency of service or time between buses” and “How often a seat is available” are respectively the first, second, fourth eighth and tenth worst rated aspects in “Average Quality”.

	Average Import. (5-pt. Scale)	April,2014		October,2013		April,2013	
		Average Quality (4-pt. Scale)	Needs Not Met	Average Quality (4-pt. Scale)	Needs Not Met	Average Quality (4-pt. Scale)	Needs Not Met
The frequency of service or time between buses	4.33	2.66	34.5%	2.71	32.8%	2.68	33.5%
Getting to your destination without transferring	4.16	2.85	24.5%	2.95	20.5%	2.83	24.3%
The speed or travel time of buses	4.14	<u>2.92</u>	19.8%	<u>3.04</u>	15.5%	2.97	18.3%
The walking distance to and from bus stops	4.11	2.98	17.0%	3.01	19.8%	2.97	17.3%
How often a seat is available	4.05	<u>2.84</u>	<u>26.8%</u>	<u>3.00</u>	21.0%	<u>2.99</u>	<u>20.5%</u>
The availability of weekend service	3.95	2.55	34.5%	2.47	38.8%	2.53	37.0%
The availability of night service	3.93	2.52	<u>32.3%</u>	2.66	<u>25.5%</u>	2.57	<u>31.8%</u>
The location of bus shelters	-	2.54	38.5%	2.58	38.0%	2.55	40.5%

BUS SERVICE

Percent Needs Not Met



BUS INFORMATION/SCHEDULE

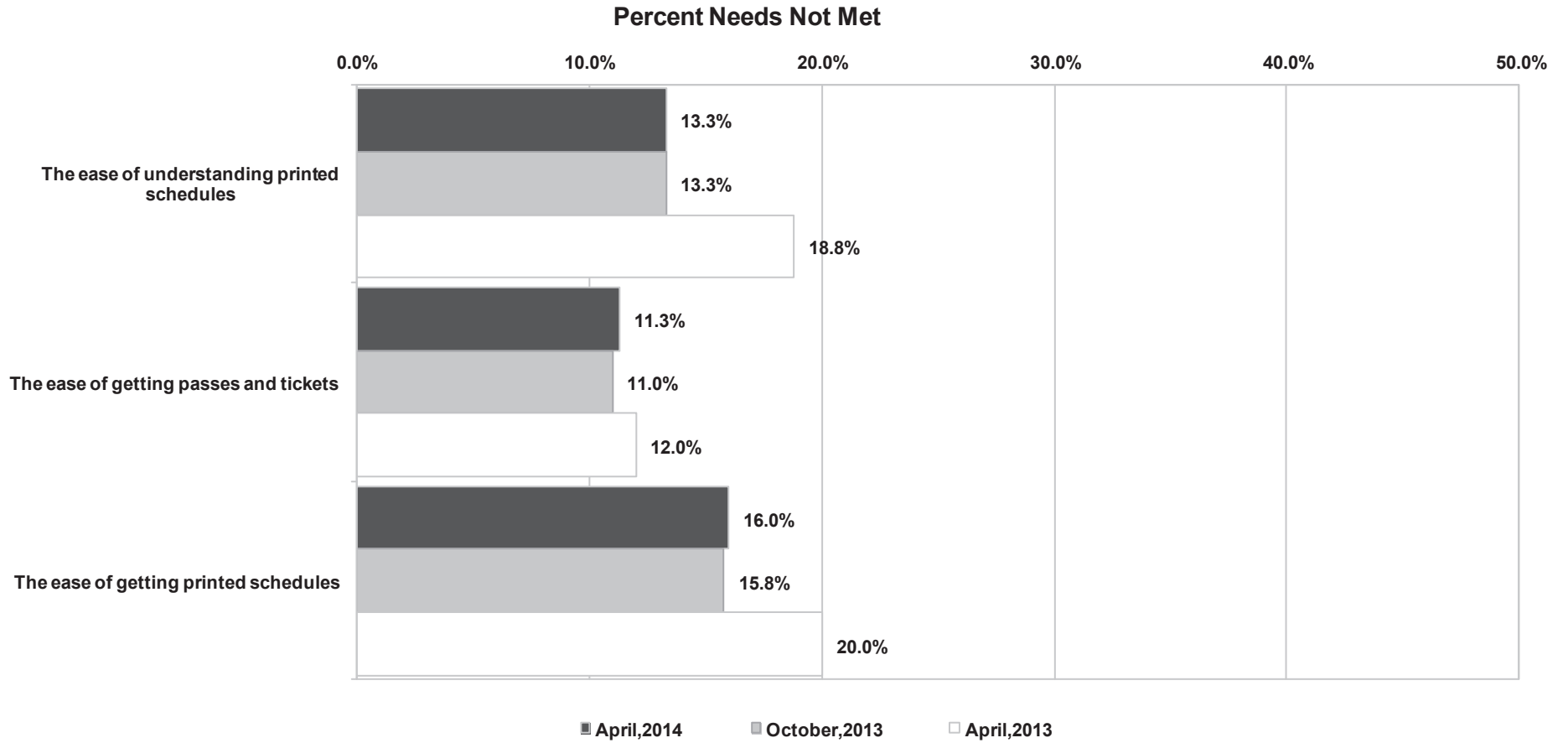
Two of the three Bus Information/Schedule aspects, “The ease of getting passes and tickets” and “The ease of getting printed schedules” are statistically the same compared to recent waves. “The ease of understanding printed schedules”, when compared to April 2013, saw a *significant* statistical decrease in “Needs Not Met”. “The ease of getting passes and tickets” is the eighth highest ranked of the 27 “Average Quality” aspects ratings (refer to Evaluation Summary – Table 2). The remaining two, “The ease of understanding printed schedules”, and “The ease of getting printed schedules” ranked as tenth and eleventh highest aspects.

	April,2014			October,2013		April,2013	
	Average Import. (5-pt. Scale)	Average Quality (4-pt. Scale)	Needs Not Met	Average Quality (4-pt. Scale)	Needs Not Met	Average Quality (4-pt. Scale)	Needs Not Met
The ease of understanding printed schedules	4.51	3.05	<u>13.3%</u>	3.10	<u>13.3%</u>	2.99	18.8%
The ease of getting passes and tickets	4.29	3.12	11.3%	3.16	11.0%	3.13	12.0%
The ease of getting printed schedules	4.25	3.05	16.0%	3.06	15.8%	2.99	20.0%

RATINGS

Management Decisions, Inc.

BUS INFORMATION/SCHEDULE



RATINGS

Management Decisions, Inc.

BUS SECURITY

The last aspect is in the Bus Security category, the “Presence of adequate security measures on the buses” has an “Average Importance” (4.45/5-points) to riders, and has the sixth lowest ranking in “Average Quality” (refer to Evaluation Summary – Table 2) this wave.

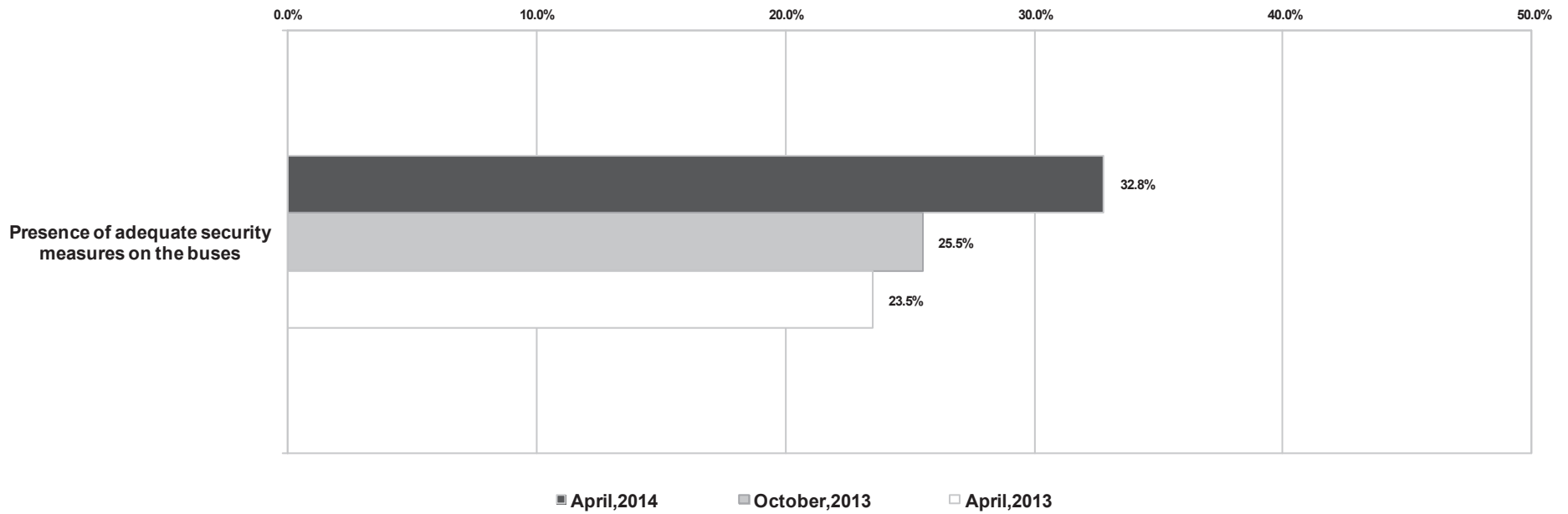
TABLE 8							
	Average Import. (5-pt. Scale)	April,2014		October,2013		April,2013	
		Average Quality (4-pt. Scale)	Needs Not Met	Average Quality (4-pt. Scale)	Needs Not Met	Average Quality (4-pt. Scale)	Needs Not Met
Presence of adequate security measures on the buses	4.45	<u>2.64</u>	32.8%	2.82	<u>25.5%</u>	2.82	<u>23.5%</u>

RATINGS

Management Decisions, Inc.

BUS SECURITY

Percent Needs Not Met



APPENDIX A

APPENDIX B

Gender	April,2014	Previous Year
Female	58.3%	57.9%
Male	41.8%	42.1%

Age	April,2014	Previous Year
18 to 24	17.3%	18.5%
25 to 34	18.3%	17.0%
35 to 44	13.3%	14.8%
45 to 54	25.3%	20.9%
55 to 64	15.0%	16.4%
65 or over	10.8%	12.4%
Refused	0.3%	0.1%

Ethnicity	April,2014	Previous Year
Black/African-American	50.3%	46.5%
White	35.0%	39.6%
Hispanic	7.3%	5.4%
Other	6.5%	5.9%
Refused	1.0%	2.6%

Education	April,2014	Previous Year
Grade school or less	0.5%	1.4%
Some high school	12.3%	11.6%
High school graduate	37.3%	36.9%
Some Voc/Tech School	2.3%	2.8%
Voc/Tech degree	4.0%	4.6%
Some college	24.5%	22.1%
College graduate	12.5%	14.6%
Post Graduate	6.5%	5.8%
Refused	0.3%	0.3%

Employment	April,2014	Previous Year
Full-time	33.8%	34.5%
Not employed	33.8%	33.9%
Part-time	18.5%	19.5%
Student	14.0%	11.6%
Refused	-	0.5%

Total Household Income	April,2014	Previous Year
Less than \$14,000	31.0%	30.8%
\$14,001 to \$18,000	10.8%	12.5%
\$18,001 to \$21,000	9.0%	7.3%
\$21,001 to \$24,000	4.5%	6.5%
\$24,001 to \$28,000	6.3%	4.5%
\$28,001 to \$32,000	3.5%	3.1%
\$32,001 to \$36,000	3.5%	3.0%
\$36,001 or more	19.8%	20.9%
Don't know/Refused	11.8%	11.5%

Management Decisions, Inc.

Number in Household	April,2014	Previous Year
One	24.5%	27.6%
Two	25.5%	27.4%
Three	17.5%	16.5%
Four	11.0%	11.5%
Five	8.5%	9.9%
Six or more	11.0%	6.4%
Don't know/Refused	2.0%	0.8%
Mean	2.97	2.75

Dependents Under 18 Living in Household	April,2014	Previous Year
None	58.8%	62.5%
One	14.0%	15.0%
Two	12.8%	10.0%
Three	6.8%	6.8%
Four	2.5%	3.6%
Five	1.8%	0.9%
Six or more	1.8%	0.6%
Don't know/Refused	1.8%	0.6%
Mean	0.92	0.78

Valid Driver's License	April,2014	Previous Year
Yes	46.8%	49.5%
No	53.3%	50.5%

Ride Bus or Use Alternative Transportation	April,2014	Previous Year
Rarely have choices	17.3%	16.5%
Have some choices	23.3%	26.5%
Have choices half of time	18.5%	17.0%
Have choices most of time	12.0%	12.5%
Always have choices	23.8%	23.9%
Not sure	5.3%	3.6%

Reasons Use Bus	April,2014	Previous Year
Social/recreational	67.3%	59.8%
Shopping	64.0%	60.0%
Medical reasons	57.0%	53.4%
Work	50.5%	50.4%
School	29.0%	28.4%
Job interviews/search	28.3%	26.8%
Job training	21.3%	17.0%
Child care	11.3%	9.4%

Management Decisions, Inc.

Primary Reason for Bus Usage	April,2014	Previous Year
Work	40.5%	40.4%
Medical reasons	16.0%	13.4%
Social/recreational	16.0%	15.3%
School	12.0%	12.9%
Shopping	11.0%	13.4%
Job interviews/search	2.5%	4.1%
Child care	2.0%	0.5%
Job training	-	0.1%

Helped by Bus Service	April,2014	Previous Year
Keep a job	61.5%	63.5%
Get a job	46.0%	44.1%
Advance in a job	30.5%	28.3%
None	34.3%	28.1%
Refused	-	-

Times Ridden in Last Three Months	April,2014	Previous Year
Less than once a month	11.3%	10.1%
1-3 times a month	18.0%	21.1%
1-2 times a week	14.3%	16.3%
3-5 times a week	25.0%	21.0%
More than 5 times/week	31.5%	31.5%
Don't know	-	-

Bus Usage in Last Three Months	April,2014	Previous Year
Increased	19.0%	19.1%
Stayed about the same	65.3%	66.6%
Decreased	15.0%	13.6%
Don't know	0.8%	0.6%

Reasons Bus Usage Increased in Last Three Months	April,2014	Previous Year
Access to auto	32.9%	28.1%
Work related	21.1%	26.8%
Social/recreational	13.2%	9.2%
School/college	11.8%	12.4%
Medical reasons	9.2%	7.2%
Gas/fuel prices	7.9%	11.1%
Parking costs	2.6%	3.9%
Weather	2.6%	2.6%
Fare cost	2.6%	3.3%
Service change	2.6%	2.6%
Other	10.5%	11.1%

Management Decisions, Inc.

Reasons Bus Usage Decreased in Last Three Months	April,2014	Previous Year
Access to automobile	35.0%	48.6%
School/college	13.3%	2.8%
Service change	11.7%	7.3%
Medical reasons	10.0%	9.2%
Weather	8.3%	6.4%
Work related	6.7%	12.8%
Safety	3.3%	4.6%
Other	20.0%	11.9%

Years Using MCTS for Transportation Needs	April,2014	Previous Year
Less than 1 year	6.3%	6.9%
1 - 2 years	8.8%	9.4%
3 - 5 years	18.0%	16.9%
6 - 9 years	11.3%	11.6%
10 - 14 years	10.8%	11.8%
15 years or more	44.0%	43.3%
Don't know	1.0%	0.3%

How Fare is Normally Paid	April,2014	Previous Year
Cash	37.0%	37.0%
Full fare ticket	25.3%	21.4%
Weekly pass	10.0%	11.4%
Half fare ticket	8.0%	8.8%
UPASS	7.0%	8.9%
Monthly pass	6.5%	6.0%
Commuter value pass	4.5%	3.1%
Freedom pass	0.5%	1.4%
Other	1.3%	2.1%

Access to the Internet	April,2014	Previous Year
At home	70.5%	66.0%
Someplace else	41.0%	40.5%
At work	38.8%	36.9%
At school	22.8%	25.1%
Do not have access	14.5%	17.9%

Visited MCTS Web Site	April,2014	Previous Year
Yes	41.8%	35.9%
No	57.9%	63.9%
Don't know	0.3%	0.2%

Management Decisions, Inc.

Personal Safety	April,2014	Previous Year
Much safer	19.8%	21.0%
Somewhat safer	19.0%	18.4%
The same	52.5%	52.3%
Somewhat less safe	4.8%	4.0%
Much less safe	3.3%	3.0%
No opinion	0.8%	1.4%

Safety/Security Concern	April,2014	Previous Year
Yes	16.8%	16.8%
No	83.3%	83.1%
No opinion	-	0.1%

Reason for Safety/Security Concern	April,2014	Previous Year
Loud/profane language	43.3%	47.8%
Uncooperative passengers	35.8%	38.8%
Fighting on the bus	31.3%	23.9%
Drunk passengers	16.4%	17.2%
Weapons seen/used	13.4%	3.7%
Physical assault, passenger	7.5%	9.0%
Theft/robbery	7.5%	5.2%
Drug dealing	4.5%	2.2%
Incidents - sexual nature	4.5%	1.5%
Other	29.9%	15.7%

Satisfied with security measures?	April,2014	Previous Year
Completely satisfied	40.0%	41.4%
Somewhat satisfied	39.5%	38.6%
Neither	10.0%	10.9%
Somewhat unsatisfied	6.0%	6.0%
Completely unsatisfied	4.5%	3.1%

Rider Insider Awareness	April,2014	Previous Year
Yes	36.5%	37.6%
No/ don't know	63.5%	62.4%

Rider Insider Participation	April,2014	Previous Year
Yes	30.1%	33.9%
No/ don't know	69.9%	66.1%

Management Decisions, Inc.

Rider Insider	April,2014	Previous Year
Exceeds expectations	29.5%	19.6%
Meets expectations	47.7%	59.8%
Nearly meets expectations	9.1%	9.8%
Does not meet expectations	11.4%	5.9%
Don't know	-	3.9%
Don't know, not received card	2.3%	1.0%

	April,2014	Previous Year
Called the MCTS information line?		
Yes	44.3%	42.0%
No	55.8%	58.0%

	April,2014	Previous Year
Ease of getting telephone information...?		
Exceeds needs	26.6%	25.9%
Meets needs	46.9%	46.7%
Nearly meets needs	15.3%	13.4%
Doesn't meet needs	10.7%	14.0%
Don't Know	0.6%	-

Any problems finding/receiving information?	Oct, 2012	Previous Year
Yes	15.3%	21.7%
No	84.7%	78.3%

What problems have you had?	April,2014	Previous Year
What bus goes where	37.0%	19.2%
Don't receive correct info	25.9%	23.3%
No live person	18.5%	38.4%
System too complicated	14.8%	19.2%
System Irritating	11.1%	9.6%
No Answer when calling	3.7%	1.4%
Hard to hear	3.7%	2.7%
All other reasons	14.8%	17.8%

Management Decisions, Inc.

Bus Riding Habits Changed	April,2014	Previous Year
Yes	19.5%	26.3%
No	80.5%	73.8%

How have they changed?	April,2014	Previous Year
More, no access to auto	38.5%	56.7%
Less, have auto access	26.9%	18.6%
Less, times changed	12.8%	5.7%
Less due to weather	6.4%	2.9%
Ride less, I do not feel safe	5.1%	2.4%
Ride less, health issues	1.3%	2.9%
Ride less, I am unemployed	-	2.4%
Less, other reasons	14.1%	10.0%

Announce streets, corners, or major destinations?	April,2014	Previous Year
Yes	77.5%	73.9%
No	17.8%	21.3%
Not Sure	4.8%	4.9%

Overall, Would You Say The Milwaukee County Transit System ...	April,2014	Previous Year
Exceeds needs	26.0%	28.6%
Meets needs	56.5%	59.0%
Nearly meets needs	14.3%	9.4%
Does not meet needs	3.0%	3.0%
Don't know	0.3%	-

APPENDIX C

**Milwaukee County Transit System
Interoffice Memorandum**

TO: Sandy Kellner, Chief Operating Officer

FROM: Planning Department -Tom Winter, Mark McComb, Dan Huebner

SUBJECT: Public Meetings: Seeking Input on Definitions' of Major Service Change, Disparate Impact, and Disproportionate Burden

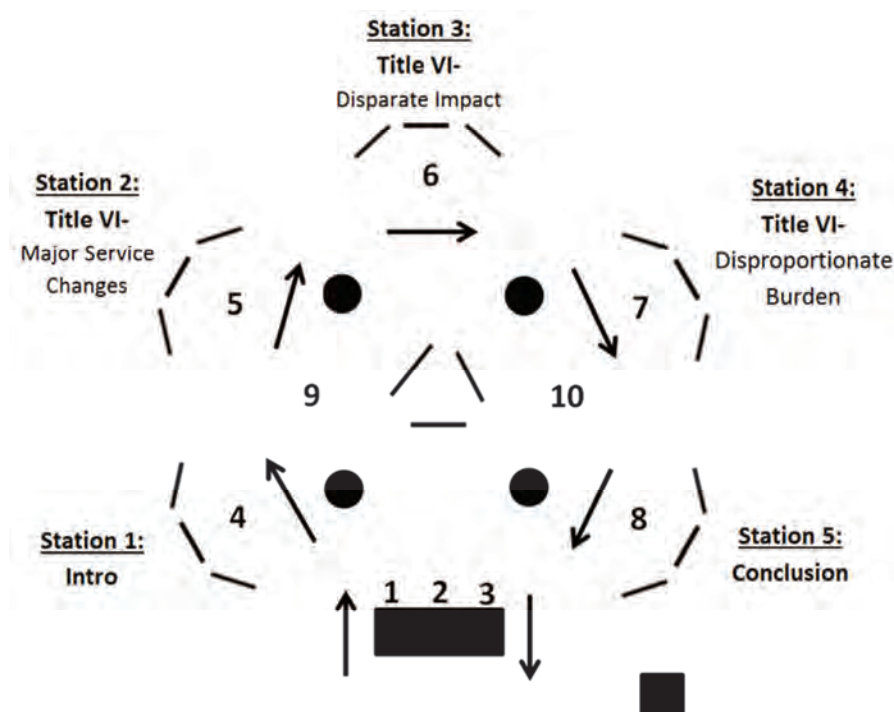
DATE: July 29, 2013

- Goal
 - To create a Public Participation Plan in accordance with Federal Transit Administration's Title VI program. The plan primarily seeks to collect public input on MCTS' policy definitions for major service change, disparate impact and disproportionate burden as well as providing a baseline for general knowledge pertaining to MCTS operations.

- Main Objectives
 - Inform the public of the importance and use of the specific policies
 - Explain to the public the current policy definitions
 - Allow the public to ask questions regarding the policies
 - Solicit feedback on the policy definitions
 - Adjust policy definitions based on feedback
 - Prepare for 2nd round of Public Participation

- Identified Stakeholders (Communication Methods)
 - Transit riders (Internal Communication)
 - General Public/Taxpayers (Politician Newsletters, Press Releases, Libraries)
 - Disabled individuals (Transit Plus, Independence First, etc.)
 - African Americans, Hispanic, Hmong, Other Groups (Community Papers, Community Organizations, Community Leaders)
 - Elderly (Milwaukee County Department on Aging)
 - Business leaders (CVP partnerships)
 - Universities & University students (U-Pass Partnerships)
 - Elected officials (County & Municipal)

- Tasks and Activities
 - In order to accomplish the stated objectives, MCTS must conduct appropriate tasks and activities to most effectively collect and integrate public input. The following diagram and subsequent personnel requirements seek to accomplish the stated objectives:



The overall flow of the public participation meeting should be loosely regulated. Attendee's should not feel pressured; however, there should be a general clockwise flow to the learning process. To help usher the flow, there will be MCTS members to keep attendee's on-track.

- Personnel
 - 1-3: Work at entrance table for material distribution. Direct attendees to a particular station based on each attendee's knowledge of MCTS operations. Collect surveys at the end of each attendee's session.
 - 4-8: Individuals will answer questions regarding each station they are assigned to. Personnel should encourage attendee's to use the adjacent tables to write down comments or questions they have.
 - 9-10: An important part of the process will be keeping the flow and conversation of the meeting consistent. Some attendee's will become off topic or stray off-course from the public participation objectives. These individuals will help to keep the meeting on task and relieve any potential confrontation among attendee's. They will also assist in any general questions that may arise regarding the adjacent system maps.

- Stakeholder Material Distribution
 - MCTS Overview
 - This is a one-page brochure with a basic overview of the company and the transit system. This will help to bring those attending under a basic understanding of our system and how MCTS operates.
 - Title VI Overview
 - Major Service Changes
 - Disparate Impact
 - Disproportionate Burden
 - Survey

- MCTS Policy Definitions
 - Major Service Change

MCTS defined a major service change back in June 24, 2009 as a change that meets at least one of the following conditions (These guidelines were chosen based on information provided in Federal Transit Administration (FTA) Circular 4702.1A):

 - it affects 25% of the bus hours on a route,
 - it affects 25% of the one way mileage of a route,
 - it affects 25% of the daily service period,
 - it reduces the frequency of service (increases the headway) by 50%, and
 - it creates a gap of greater than one-half mile from the nearest alternative service.

 - Disparate Impact

The FTA definition – refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

MCTS defined a disproportionately adverse impact using the “four – fifths” rule. Specifically, a disparate impact has occurred when the ratio of the reduction in service to the minority / low-income population compared to the non-minority / non low-income population exceeds four/fifths or 0.80. This measure has been used by other transit systems in their evaluation of major service changes.

 - Disproportionate Burden

FTA definition - refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Thomas Winter - FOR IMMEDIATE RELEASE: MCTS ANNOUNCES PUBLIC MEETINGS

From: Jennifer Bradley
To: Bradley, Jennifer
Date: 9/17/2013 11:39 AM
Subject: FOR IMMEDIATE RELEASE: MCTS ANNOUNCES PUBLIC MEETINGS

To View this email properly, please go to "View" and select "HTML"



FOR IMMEDIATE RELEASE

September 17, 2013

Contact: Jennifer Bradley
 414-937-3253

MCTS ANNOUNCES PUBLIC MEETINGS

Seeking Feedback on Title VI Equity Standards and Guidelines

MILWAUKEE, WI – Milwaukee County Transit System (MCTS) has scheduled two public meetings to solicit feedback on setting up guidelines for transit services. We are asking for public input to assist us in answering questions like, “If MCTS had to make changes to bus service, what would be fair to all individuals?”

On Tuesday, October 1 and Tuesday, October 8, 2013, MCTS will present the public with proposed Title VI policy definitions for public feedback. As a public agency that receives funding from the Federal Transportation Administration, MCTS follows the service policies of Title VI of the Civil Rights Act of 1964.

Title VI policy definitions include:

- **Major Service Change:** the policy that defines the level at which MCTS, the public and its riders consider a major service change.
- **Disparate (Unequal) Impact:** the policy that defines the amount of when a reduction in MCTS service or a fare change unfairly

(disproportionately) affects members of a group identified by race, color or national origin.

- **Disproportionate (Unequal) Burden:** the policy that defines when a low-income population is affected more by service or fare changes than a non-low-income population and how MCTS will evaluate alternatives and ease burdens where possible.

MCTS Public Meeting Schedule and Locations:

Tuesday, October 1, 2013 from 1 PM to 4 PM

Milwaukee Center Street Library, 2727 W. Fond du Lac Ave., Milwaukee, WI 53210
On MCTS bus routes: BlueLine, 22, 23 and 27

Tuesday, October 8, 2013 from 4 PM to 7 PM

Milwaukee Central Library, 814 W. Wisconsin Ave., Milwaukee, WI 53233
On MCTS bus routes: BlueLine, 10, 12, 14, 23, 30 and 31

The public is encouraged to attend the interactive meetings. Attendees will be able to visit displays that explain individual Title VI policy definitions and MCTS personnel will be present to gather feedback and answer questions.

Regarding the importance of attendance, Sandy Kellner, MCTS Chief Operating Officer said, "Receiving feedback is essential to helping MCTS ensure fair and equitable transit service."

Feedback from the public will be combined with an in-depth analysis of MCTS's current service and practices to be shared with the Milwaukee County Board in the form of a policy recommendation. Upon approval from the board, MCTS will have a comprehensive, publicly evaluated Title VI policy.

For those unable to attend the meeting and would like more information, they can visit RideMCTS.com to view meeting materials, or call 414-344-4550 and ask for Daniel Huebner. Feedback about Title VI policies may be made in writing to: Planning Department – Title VI, Milwaukee County Transit System, 1942 N. 17th Street, Milwaukee, WI 53205 or by visiting RideMCTS.com/about-us/contact-us/suggestions-feedback and filling out the online form. Feedback will be considered through October 15, 2013.

The meeting sites are accessible by wheelchair. With advance notice of five business days, MCTS can make special accommodations for persons with disabilities, limited English speaking ability, or persons needing auxiliary aids or services including interpreters for the public sessions. Call 414-344-4550 and ask for Daniel Huebner to request special accommodations.

The Milwaukee County Transit System is a vital service to the community, connecting 45 million riders each year with jobs, schools, shopping, healthcare and recreation in Milwaukee County.

###



MCTS ANNOUNCES PUBLIC MEETING

Seeking Feedback on Title VI Equity Standards and Guidelines

Milwaukee County Transit System (MCTS) has scheduled two public meetings to hear your feedback on Title VI equity standards and guidelines for transit services. As a public agency that receives funding from the Federal Transportation Administration, MCTS follows the service policies of Title VI of the Civil Rights Act of 1964. Please attend one of the meetings.

MCTS Public Meeting Schedule and Locations:

Tuesday, October 1, 2013 from 1 PM to 4 PM

Milwaukee Center Street Library
2727 W. Fond du Lac Ave.
Milwaukee, WI 53210
On MCTS bus routes:
BlueLine, 22, 23 and 27

Tuesday, October 8, 2013 from 4 PM to 7 PM

Milwaukee Central Library
814 W. Wisconsin Ave.
Milwaukee, WI 53233
On MCTS bus routes: BlueLine, 10, 12, 14, 23, 30 and 31

Locations are ADA accessible. For more information or to request special accommodations call Daniel Huebner at 414-344-4550.



Attendees will be able to visit displays that explain the following individual Title VI policy definitions and MCTS personnel will be present to gather feedback and answer questions:

- **Major Service Change:** the policy that defines the threshold at which MCTS, the public and its riders consider a major service change.
- **Disparate Impact:** the policy that defines the measure of when a reduction in MCTS service or fare change disproportionately affects members of a group identified by race, color or national origin.
- **Disproportionate Burden:** the policy that defines when a low-income population is affected more by service or fare changes than non-low-income population and how MCTS will evaluate alternatives and ease burdens where possible.

If you are unable to attend the meeting and would like more information, visit our website to view meeting materials and provide feedback beginning October 1, 2013, or call 414-344-4550 and ask for Daniel Huebner.

Feedback about Title VI policies may be made in writing to: Planning Department – Title VI, Milwaukee County Transit System, 1942 N. 17th Street, Milwaukee, WI 53205. Feedback will be considered through October 15, 2013.

414-344-6711 - RideMCTS.com



WELCOME!

To MCTS' Public Meeting
to Seek Feedback on Title VI Equity
Standards and Guidelines.

Thank you for attending this MCTS public meeting. We appreciate your feedback on setting up our guidelines for transit service and fare changes. Your feedback will help us in answering questions like, "If MCTS had to make changes to bus service, what would be fair to all individuals?"

As a recipient of federal funds, MCTS complies with Title VI of the Civil Rights Act of 1964, Presidential Executive Order 12898, and Federal Transit Administration (FTA) Circular 4702.1B. This is designed to ensure that changes to transit service and changes to transit fares are not discriminatory to minorities or low-income individuals.

As part of this process, MCTS develops internal policies that guide us when fare or service changes are proposed. Those policies are:

- **Major Service Change:** the policy that defines the level at which MCTS, the public and its riders consider a major service change.
- **Disparate (Unequal) Impact:** the policy that defines when a change in MCTS service or a fare change unfairly (disproportionately) affects members of a group identified by race, color or national origin.
- **Disproportionate (Unequal) Burden:** the policy that defines when a low-income population is affected more by service or fare changes than a non-low-income population and how MCTS will evaluate alternatives and ease burdens when possible.

Comments will be accepted at this public information meeting, as well as online at RideMCTS.com or via mail. Comments will be accepted through October 15th, 2013. MCTS will then take the comments received into consideration when drafting the final policy definitions. Details on where comments can be submitted can be found on the handout you received when you arrived at the welcome desk.

About This Meeting

There are four stations, each with different information:

- 1) Introduction to Title VI and the process**
- 2) Major Service Change**
- 3) Disparate Impact & Disproportional Burden**
- 4) Conclusion**



Please explore each station and offer your comments. This meeting is designed to collect your comments on MCTS' definition of a Major Service Change, as well as MCTS' Disparate Impact & Disproportional Burden Policies. At each of these stations, MCTS staff will be available to answer any questions you may have about the information presented.

There are various ways that you may share your comments with us:

- Share your comments with our staff members, who will officially record them
- Write down your comments on the survey forms that you received when you arrived
- Visit our website RideMCTS.com and submit comments online
- Mail your comments to us by addressing them to:

TITLE VI
MILWAUKEE COUNTY TRANSIT SYSTEM
1942 N 17TH STREET
MILWAUKEE WI 53205

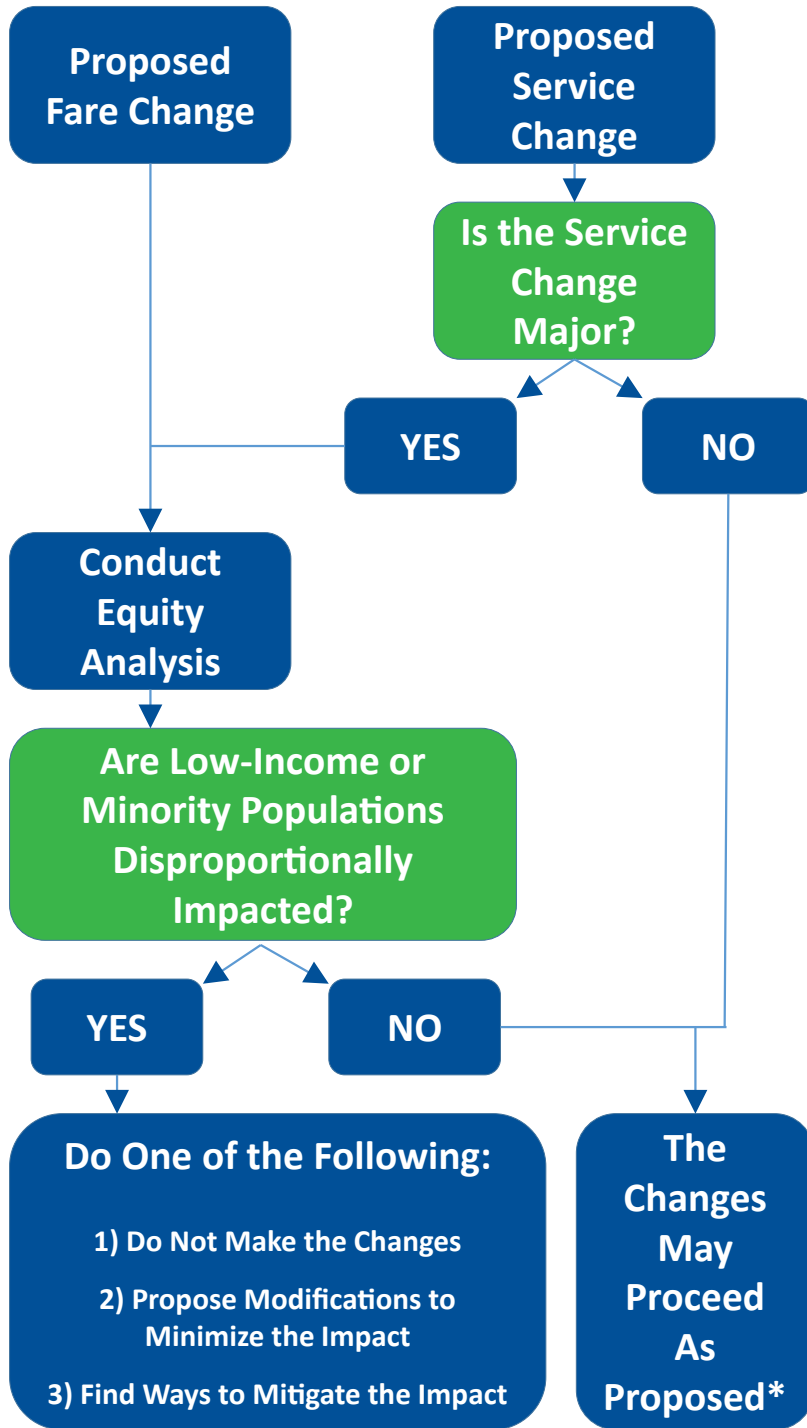
Your feedback will be accepted until October 15th, 2013. Using public feedback as guidance, MCTS will then formulate final policies which will be presented to the Milwaukee County Board for formal adoption.

What this meeting is not about:

No specific service or fare changes are being proposed at this time. The goal of this meeting is to set equity policies that relate to future fare and service proposals. Unfortunately, due to limited time, only comments relating to these policies will be recorded as part of the official record; however, if you wish to comment about other transit concerns please see a staff member in the center of the room.

Fare and Service Equity Analysis Process

The following flowchart illustrates the steps that MCTS must follow when proposing a fare or service change based on the guidelines from Title VI of the Civil Rights Act of 1964. The questions below in green ("Is the service change major?" and "Are low-income or minority populations disproportionately impacted?") are the focus of this meeting. MCTS is seeking your input about what should constitute a "Major Service Change" and input on the policies that determine when low-income or minority populations are disproportionately impacted by such changes.



Whether a service change is considered "major" is determined by MCTS' Major Service Change Policy. If the proposed changes do not meet the policy thresholds then the changes are not considered major may occur as planned.

All proposed fare changes must be analyzed, regardless of how minor the proposed changes are.

MCTS' Disparate Impact Policy is the threshold that determines if minority populations are disproportionately impacted by the changes.

MCTS' Disproportionate Burden Policy is the threshold that determines if low-income populations are disproportionately impacted by the changes.

Each policy can use the same thresholds, or they can differ. MCTS currently uses the same threshold for both.

If a proposed change result in a disproportionate impact, MCTS will consider modifying the proposed change to avoid, minimize or mitigate the disproportionate burden of the change. Any modifications to the original proposal will then be re-evaluated.

If MCTS chooses not to alter the proposed changes, the agency may still implement the change if there is substantial legitimate justification for the change and the agency can show that there are no alternatives that would have less on an impact and would still accomplish the agency's legitimate program goals.

*-See "MCTS fare and service change approval process" board for more information.

MCTS Major Service Change Policy

MCTS defined a major service change in June of 2009 as a change that meets at least one of the following conditions (these guidelines were chosen based on information provided in Federal Transit Administration (FTA) Circular 4702.1A):



- 1) affects 25% of the bus hours on a route or group of routes**
- 2) affects 25% of the one-way mileage of a route or group of routes**
- 3) affects 25% of the service span**
- 4) reduces the frequency of service by 50%**
- 5) creates a gap of greater than one-half mile from the nearest alternative service**

The following are not considered “major service changes”: short-term seasonal changes, temporary changes resulting from construction activity, changing a route number or other designation, change or discontinuation of demonstration or experimental service within the first year, service changes on special service routes, or changes resulting from an emergency situation.

These guidelines apply to any service addition, expansion, reduction, adjustment, or reallocation. It is important to remember that the definition should truly reflect what is considered a major change that has the potential to affect many people, rather than minor changes which may only impact a limited number of people.

This policy does not determine what kinds of service changes that MCTS can, or cannot, engage in. This policy simply determines when proposed changes require MCTS to conduct an equity analysis. If an equity analysis is conducted, and the results show that there are no disproportionately negative impacts to minority or low-income populations, then MCTS can proceed with the changes. Similarly, if a proposed change is not considered “major” then MCTS may also proceed with the changes.

Examples of Service Changes (1 of 2) ^{A-159}



Affects 25% of the bus hours on a route or a group of routes:

What are "Bus Hours"?

A bus route has multiple buses going back and forth along the route all day.
A route's total "bus hours" is the total of the time that each vehicle is on the road.

For the following examples, suppose a bus route has 3 buses going back and forth all day (see right).

Bus Number	Time the bus leaves the garage to the time it returns	Bus Hours
1	6am to 6pm	12
2	6am to 7pm	13
3	7am to 7pm	12

The total bus hours for the route is 37 (12+13+12).
In order for a major service change to occur, the bus hours would have to increase or decrease by more than 9.25 hours (25% of 37 hours).

Based on this policy, would a major service change equity evaluation be needed if...

- another bus was added to this route from 7am to 7pm (12 more hours)? **Yes**
- bus number 3 was removed from this route (12 less hours)? **Yes**,
- another bus is added to this route from 7am to 11am (4 more hours)? **No**

Affects 25% of the one-way mileage of a route or a group of routes:

What is "One-Way Mileage"?

One-way mileage is the distance in miles from one end of a route to the other.

For the following examples, if a route was 10 miles long, a major change would occur if more than 2.5 miles of the route were added, removed, or changed (25% of 10 miles is 2.5 miles).



Based on this policy, would a major service change equity evaluation be needed if...

- the route was shortened by 2 miles? **No**



- the route was shortened by 4 miles? **Yes**



- the route remains 10 miles; however, 4 miles of the route are diverted to a different street? **Yes** (more than 2.5 miles of the route are "affected" (changed) in this situation)



Examples of Service Changes (2 of 2)^{A-160}



Affects 25% of the service span:

What is the “Service Span” of a route?

The service span is the time of the first bus of the day on a route until the time of the last bus of the day on the route. For example, if the first bus on a route left at 5am and the last bus on the same route was at 11pm then the service span of that route would be 18 hours (5am to 11pm).

For the following examples, if the service span of a route was 18 hours (from 5am to 11pm), then an increase, or a decrease, of 4.5 hours would be considered a major service change (25% of 18 hours is 4.5 hours).

Based on this policy, would a major service change equity evaluation be needed if the route is modified to operate from...

- 5am to 7pm (14 hours, a span reduction of 4 hours)? **No**
- 5am to 6pm (13 hours, a span reduction of 5 hours)? **Yes**
- 4am to 1am (21 hours, a span increase of 3 hours)? **No**
- 4am to 3am (23 hours, a span increase of 5 hours)? **Yes**

Reduces the frequency of service by 50%:

What is a route’s “Frequency of Service”?

At any location, a route’s frequency of service is the number of minutes it takes after one bus leaves until the next bus leaves. This is also known as a route’s headway.

For example, if a route has a 20-minute frequency of service (a bus shows up every 20 minutes), it would be considered a major service change if the frequency of service was reduced to every 30 minutes or greater (50% of 20 minutes is 10 minutes. If the frequency is already 20 minutes then reducing it an additional 10 minutes between buses would become 30 minutes).

Creates a gap of greater than one-half mile from the nearest alternative service:

If service is eliminated, it is important that customers have alternative services that they can use. If none are available, it creates a significant hardship on the customer’s ability to get where they need to go. For example:

- If two routes are operating on the same street, and one of them is eliminated, passengers may still be able to use the other route that would still be operating on that street. This would not be considered a major service change because **the affected people would still have transportation.**
- If only one route operated on a street, and it was **a one-mile walk to the next closest route**, then it would be a major service change for passengers to no longer serve this street. In this situation, the affected customers could find themselves without access to transportation.

MCTS Disparate Impact Policy



What is “Disparate Impact”?

It is unintentional discrimination. For MCTS, it is when a fare or service change negatively affects minority populations more than non-minority populations.

MCTS proposes to establish this Disparate Impact policy in compliance with applicable federal requirements (Executive Order 12898 and FTA Circular 4702.1B).

MCTS uses the four-fifths rule (also known as the 80% rule) as the threshold for its Disparate Impact policy.

Please see the special display board for an understanding of how the four-fifths rule is calculated.

If a proposed change results in exceeding this threshold, MCTS will attempt to minimize or mitigate the impact that the changes have on minority populations. MCTS can also decide to no longer proceed with the change. Please see the Fare and Service Equity Process board for more information.

MCTS Disproportionate Burden Policy



What is “Disproportionate Burden”?

It is when a fare or service change negatively affects low-income populations more than non-low-income populations. MCTS defines low income as being below the US poverty guidelines.

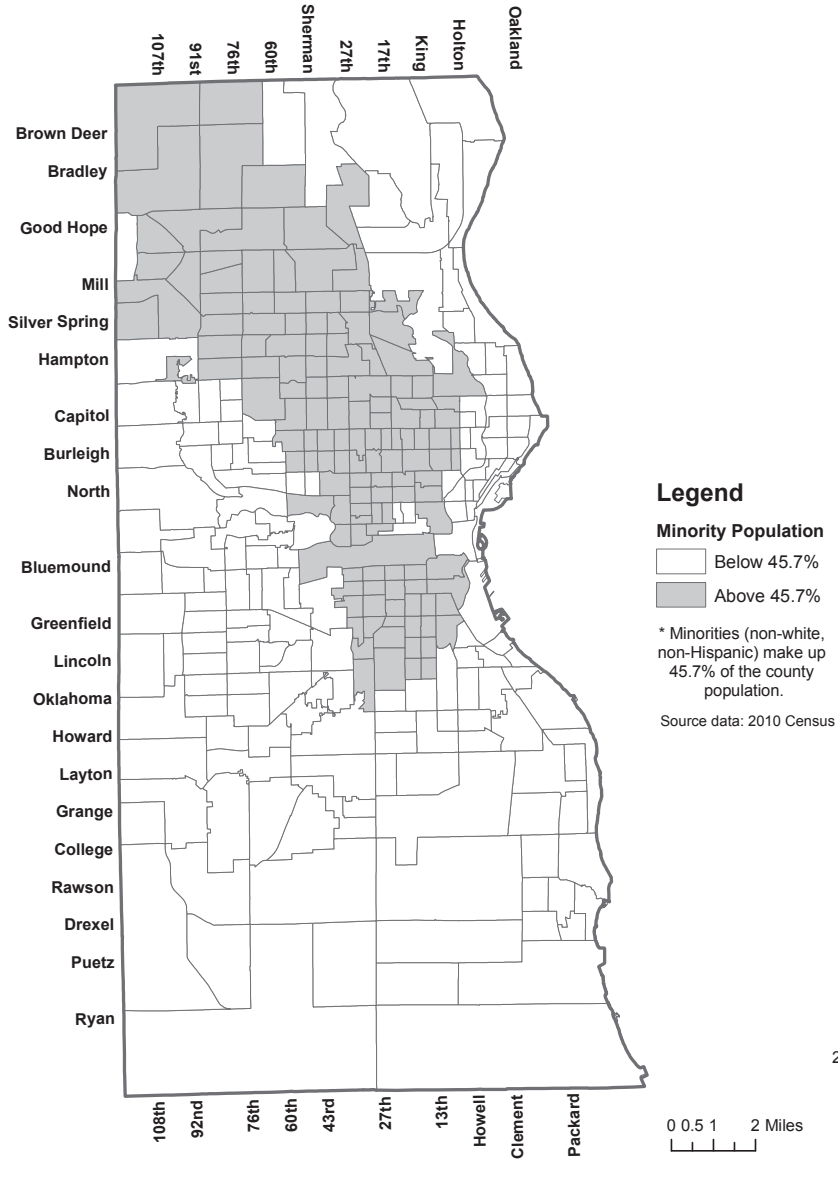
MCTS proposes to establish this Disproportionate Burden policy in compliance with applicable federal requirements (Executive Order 12898 and FTA Circular 4702.1B).

MCTS uses the four-fifths rule (also known as the 80% rule) as the threshold for its Disproportionate Burden policy.

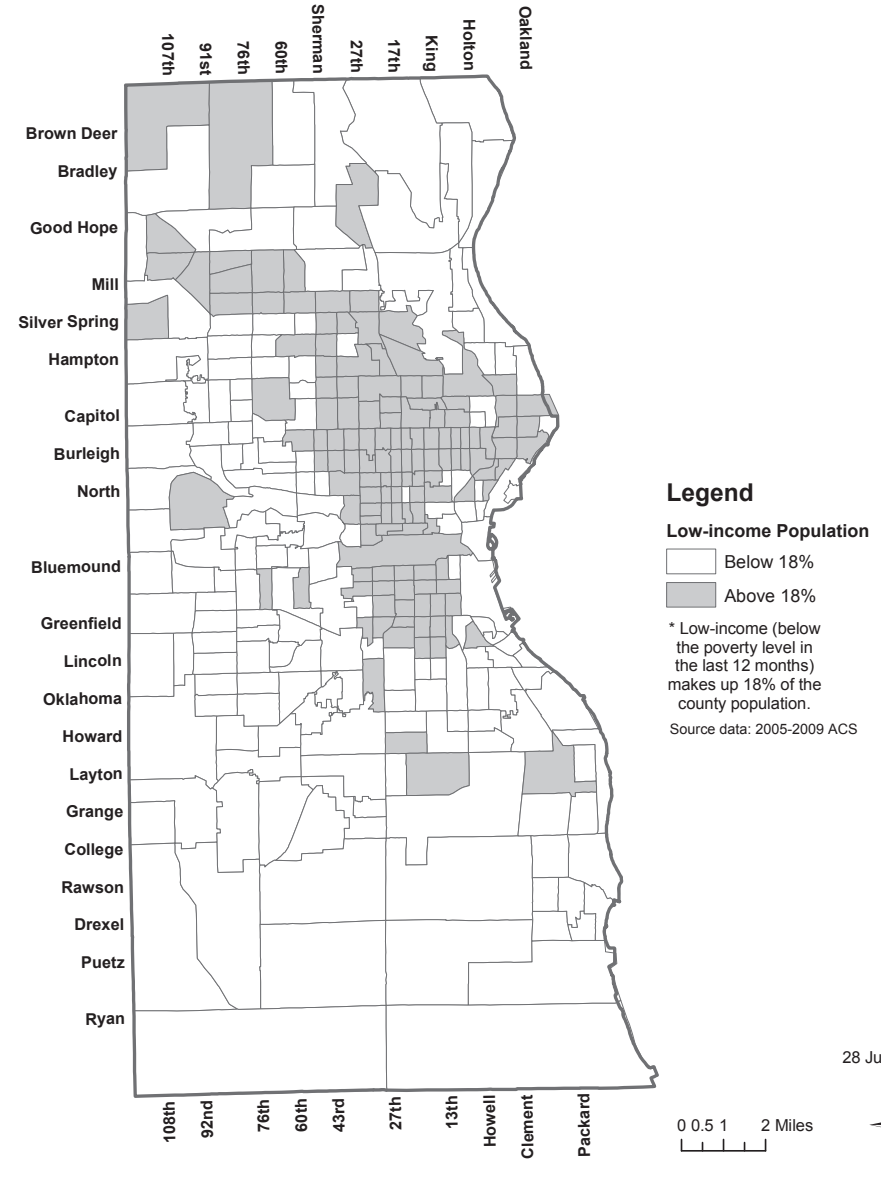
Please see the special display board for an understanding of how the four-fifths rule is calculated.

If a proposed change results in exceeding this threshold, MCTS will attempt to minimize or mitigate the impact that the changes have on low-income populations. MCTS can also decide to no longer proceed with the change. Please see the Fare and Service Equity Process board for more information.

Minority Population by Census Tract Compared to Milwaukee County Minority Population



Low-Income Population by Census Tract Compared to Milwaukee County Low-Income Population



What is the Four-Fifths Rule?



The four-fifths rule, also known as the 80% rule, is a method of calculating how much one group is impacted when compared to another group. Specifically, when using this threshold, a disparate impact or disproportionate burden has occurred when the ratio of the reduction in service to the minority (or low-income) population compared to the non-minority (or non-low-income population) is below four/fifths (80%). The easiest way to understand this is through some examples:

Example 1:

- A low-income area has 50 buses passing through (bus trips) per day and there is a proposal to remove 5 trips. This is 90% of the level of service that originally operated. ($45 \div 50 = 90\%$)
- A non-low-income area has 20 trips per day and there is a proposal to remove 3 trips. This is 85% of the level of service that originally operated. ($17 \div 20 = 85\%$)

To determine if this example violates the four-fifths rule, take the low-income area's outcome (90%) and divide it by whichever group has the highest outcome (in this case the low-income area has the highest outcome with 90%). If the results are less than 80% then there is a violation.

In this case: $90 \div 90 = 100\%$ so there is not a violation.

Example 2:

- A minority area has service from 6am to 10pm (a service span of 16 hours) per day and there is a proposal to end service at 6pm instead (6am to 6pm is a service span of 12 hours). This is 75% of the service span that originally operated. ($12 \div 16 = 75\%$)
- A non-minority area has service from 6am to 6:30pm (a service span of 12.5 hours) per day and there is a proposal to end service at 6pm instead (6am to 6pm is a service span of 12 hours). This is 96% of the service span that originally operated. ($12 \div 12.5 = 96\%$)

To determine if this example violates the four-fifths rule, take the minority area's outcome (75%) and divide it by whichever group has the highest outcome (in this case the non-minority area has the highest outcome with 96%). If the results are less than 80% then there is a violation.

In this case: $75 \div 96 = 78\%$ so there **IS** a violation.

How is the Disparate Impact Policy calculation different from the Disproportionate Burden Policy?

The only difference is the population group that they apply to. Disparate Impact applies to minority populations while Disproportionate Burden applies to low-income populations. MCTS has chosen to use the four-fifths rule as the threshold for both of its policies; therefore, they are both calculated the same based on the population group that they represent.



THANK YOU!

**Your participation today
gave us important feedback.**

Thank you for attending this Milwaukee County Transit System public meeting. The information received will be combined with a study of MCTS' current practices to be shared with the Milwaukee County Board in the form of a policy recommendation. Upon approval from the Milwaukee County Board, MCTS will have a comprehensive, publicly evaluated Title VI policy.

Future decisions about transit service or fare changes will be evaluated using the policies that you helped form to ensure that changes are distributed equitably to minority and low-income populations and are not discriminatory.

Please place your completed survey forms in the boxes located at each station.

Questions? Ask an MCTS representative or contact us by mail:

TITLE VI
MILWAUKEE COUNTY TRANSIT SYSTEM
1942 N 17TH STREET
MILWAUKEE WI 53205

(414) 344-4550

Materials from this meeting will also be posted at RideMCTS.com

-Milwaukee County Transit System

**Milwaukee County Transit System
Interoffice Memorandum**

DATE: August 25, 2011
TO: Nancy Senn
FROM: Tom Winter
SUBJECT: MCTS Title VI Program - Equity Evaluation of Proposed 2012 Budget

The Federal Transit Administration (FTA) requires transit systems that receive federal funding and serve urbanized areas over 200,000 residents to evaluate major service changes or fare changes as a part of their Title VI plan. The intent of the analysis is to verify that proposed or planned changes in service and fares do not have a discriminatory impact on persons based on their race, color, or national origin or who have low incomes (FTA Circular 4702.1A, Page V-5, May 2007). The purposes of this process are as follows:

- Assess the effects of the proposed service or fare change.
- Assess the alternatives available for people affected by change.
- Determine if proposals would have a disproportionately adverse effect on low income or minority riders.
- Describe the actions proposed to minimize, mitigate, or offset any adverse effects.

A disproportionately adverse impact is defined as one that (1) is predominately borne by a minority population and/or a low-income population, or (2) will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse impact that will be suffered by the non-minority population and/or non-low-income population.

Background - Equity Evaluation and Major Service Change Policy

FTA guidelines state that an equity evaluation is required when changes in service are considered to be “major”, i.e., they are above a locally defined threshold. MCTS defined a major service change as one that met at least one of the following conditions:

- it affects 25% of the bus hours on a route,
- it affects 25% of the one way mileage of a route,
- it affects 25% of the daily service period,
- it reduces the frequency of service (increases headway) by 50%, or
- it creates a gap of greater than one-half mile from the nearest alternative service.

These guidelines were chosen based on information provided in FTA Circular 4702.1A.

Identification of Major Service Changes - 2012 Proposed MCTS Budget

The proposed 2012 budget required MCTS to reduce operating costs by \$9.6 million compared to 2011. This decrease translated to a 12% reduction in annual bus hours. It should also be noted that service levels have been reduced 25% from their high point in 2000 to 2010 for a combined reduction of 37%.

Given the magnitude of these changes, MCTS decided that a system-wide route restructuring plan was a better approach as opposed to previous approaches that simply eliminated individual routes. The benefit of this plan is that it would allow resources to be reallocated in a way that would benefit the majority of riders and yet still meet the budget target. In essence, this plan would provide necessary levels of service where the demand was high, and basic levels of service elsewhere. The consequence of this decision is that nearly every route in the system would undergo a major service change according to the definitions described earlier.

The specific changes in the proposed 2012 budget for transit service are as follows (Maps 1 – 2011 Existing System Map and 2 - 2012 Proposed Budget Map):

- Eliminate Freeway Flyer Routes 40, 43, 44, 46, 48 and 49.
- Eliminate Route 68 and in Fall 2012, Routes 50, 85, 87, 88 and 89.
- Eliminate extensions and additional service provided by funding from the Job Access - Reverse Commute (JARC) program and the Wisconsin Employment Transportation Assistance Program (WETAP) program: Extension on Routes 12 and 27, Added service on Route 28, and Route 68 service on Saturday night and all day Sunday service.
- Restructure service on the following sets of routes:
 - Routes 12, 21, 30, 35, and 80
 - Routes 19 & 57
 - Routes 31 and 33
 - Routes 11, 18, 54 and 68
 - Routes 15 and 51
- Eliminate segments of the following routes: Routes 12, 23, 27 and 60.
- Reduce the frequency of service on the following routes: Routes 21, 22, 23, 30, 53, 55, 60, 62 and 63
- Eliminate special event service: all service (flyers and shuttles) to ethnic festivals and flyer service to Summerfest and State Fair. Route 90 service to Miller Park would also be discontinued.
- Increase Transit Plus paratransit fare from \$3.25 to \$4.50
- Reduce Transit Plus paratransit service area to within $\frac{3}{4}$ mile of fixed routes.

Methodology for Analyzing Service Changes

FTA allows transit systems to develop their own procedures in their evaluation of major changes in service and fares (FTA Circular 4702.1A, Page V-7, May 2007). MCTS chose to develop its own procedures as described in “Option B - Locally Developed Evaluation Procedure”. This option was particularly appropriate since planners could address the issues noted in the Title VI regulations at the same time they were trying to meet the requirement to reduce the budget.

The methodology used by MCTS compared the existing level of service within individual census tracts to the proposed level of service. The level of service was measured as the total number of daily transit trips serving each census tract. The percent change in service from the existing to the proposed was then calculated and assigned to each tract. This value was used as the measure of change in access to transit service. The demographics of each census tract were then reviewed to determine if it was a predominantly minority or low-income area. Finally, the change in access to transit was compared among minority and non-minority areas and among low-income and non-low-income areas to determine if there was a disparate distribution in the change in access to transit.

Data Definitions

The minority population was defined as everyone not white-alone, non-Hispanic origin. Using 2010 Census data, the average minority population (non-white) within Milwaukee County is 45.7%. Census tracts with a minority population greater than 45.7% are defined as predominantly minority areas (Map 3 – Minority Rate in Predominantly Minority Areas).

The low-income population is defined as everyone with incomes, in the past 12 months, below the poverty level. Using 2005-2009 American Community Survey data at the level of Milwaukee County the low-income rate is 18%. Census tracts with a low-income population greater than 18% are considered predominantly low income census tracts for the analysis (Map 4 – Poverty Rate in Predominantly Low Income Areas).

A geographic information system was used to guide the process of assigning routes to specific census tracts. MCTS considered a distance of 0.25 mile from a route to be the extent of its service area. A census tract that had more than 50% of its area within a 0.25-mile buffer of the bus route was considered within its service area. These “served” census tracts were then assigned the sum of weekday bus trips from weekday bus route segments that intersect those tracts. The existing level of service was based on bus schedules in effect from January to March 2011. The proposed level of service was taken from the 2012 budget service plan.

MCTS defined a disproportionately adverse impact using the standard “four – fifths” rule. Specifically, a disparate impact has occurred when the ratio of the reduction in service to the minority / low-income population compared to the non-minority / non low-income population exceeds four/fifths or 0.80. This measure has been used by other transit systems in their evaluation of major service changes.

Review of Impacts on the Minority and Low-Income Community

FTA guidelines state that transit systems must identify the impacts service changes will have on the minority and/or low-income communities. As regards route changes, they require that maps be produced to show how routes would be eliminated or reduced along with demographic data that highlights census tracts where the minority and low-income population is greater than the average in system's service area. Similar maps must be made for routes that will undergo a reduction in their span of service.

As was noted, the minority population in Milwaukee County is 45%. The average percent change in transit service in minority tracts was calculated to be -10.39% (Map 5 - Percent Change in Service in Predominantly Minority Areas and Table 1). In comparison, the average percent change in transit service in non-minority tracts was -13.43% (Table 2). The resulting impact of proposed changes is a smaller level of service reduction in predominantly minority census tracts.

The low-income rate in Milwaukee County is 18%. The average percent change in transit service in low-income census tracts was calculated to be -15.51% (Map 6 - Percent Change in Service in Predominantly Low Income Areas and Table 3). In comparison, the average percent change in service in non low-income tracts was -14.53% (Table 4). The resulting impact of proposed changes is a slightly greater level of service reduction in predominantly low-income census tracts.

The span of service would be reduced on five routes created / modified in the restructuring process. Routes 52, 64, 70, 84, and 92 would only operate on weekdays from approximately 6 a.m. to 6 p.m. Existing service on these street segments operates all day and on weekends. The population served by these routes, however, is not within the area defined as predominantly minority or low-income (Maps 7 & 8 - Routes with Reduced Service Spans and Percent Minority / Poverty Census Tracts).

The only fare change under consideration is the proposed increase in paratransit fare from \$3.25 to \$4.50. The existing fare has been in place since 2003 when the Americans with Disabilities Act (ADA) required service provisions were implemented. The proposed increase to \$4.50 is within the maximum allowed under the ADA regulations, i.e., double the fixed route cash fare (currently \$2.25). An analysis of the impact of this proposed change, however, is limited by a lack of data on the paratransit service. As a result, it is our intent to examine additional data needs specific to paratransit and develop a plan for future data collection to assist with service monitoring and equity evaluation.

The proposed MCTS budget for 2012 also includes a reduction in the size of the area that would receive paratransit service. MCTS currently provides service to all of Milwaukee County. This proposed change would continue to satisfy the ADA requirements, i.e., service would include origins and destinations within a three-fourths of a mile corridor along each fixed route. Despite this overall service area reduction, service would continue

to include nearly all of those areas defined as being predominantly minority and low income (Maps 9 and 10 - Assessing Equity in Transit Plus Service Area Change).

Identification of Alternatives to Riders Impacted By Proposed Service Changes

FTA guidelines state that transit systems should analyze what routes are available for people affected by service reductions. This analysis should compare the travel time and cost of the current route with the travel time and cost to the rider of the alternatives.

MCTS made every effort during the process of restructuring service to avoid complete route eliminations as well as to minimize the impact on riders. The only fixed route elimination included in the proposed plan was Route 68 (Port Washington Road). The segment of this route that is the most heavily utilized would be replaced by an extension of a new route (Route 11).

Several segments of routes would also be eliminated in the restructuring plan. Only two segments, however, are within the area defined as being predominantly minority and /or low-income. In these cases – Route 11 on Miller Parkway and Route 12 on Green Bay Road – alternative service is available within one-half mile of an adjacent route. There would not be any change in fare to use the alternative service.

Route Segment Eliminated	Available Alternative Service
Route 11 – On Miller Parkway from Greenfield to Lincoln	Various alternatives within ½ mile of Routes 18, 53, 54, & 56
Route 11– On Bolivar from Howell to Pine and On Pine from Bolivar to Layton	Routes 11 & 55 within ½ mile of Howell and Layton
Route 12 – On Green Bay Rd. from Good Hope to Brown Deer	Limited alternatives: Route 12 within ½ mile of Good Hope and Route 65 within ½ mile of Brown Deer
Route 15 – On Madison, 5 th , and Columbia Ave.	Limited alternatives: Route 15 within ½ mile of 10 th Ave. and Columbia Ave.
Route 19 On 20 th , Wood Ave., 19 th , and Salem south of College	Route 20 within ½ mile of College
Route 27 – Limited Service to Glendale Industrial Park	Route 63 within ½ mile of Silver Spring
Route 27 – On Ramsey, 35 th , and College Ave.	Route 27 within ½ mile of 27 th
Route 31 – On Ludington Ave. from Wauwatosa Ave. to North	Routes 21 within ½ mile of North and Route 76 within ½ mile of 76 th
Route 31 – On Milwaukee Ave. from 68 th to Harwood Rd.	Routes 31, 33 and 70 within ¼ mile
Route 67 – On 92 nd St. from Greenfield Ave. to Bluemound Rd.	Route 56 within ½ mile of Greenfield Ave. and Route 10 within ½ mile of Bluemound
Route 76 – On 68th St. from Forest Home Ave. to Southridge	Route 14 within ½ mile of Forest Home, Route 55 within ½ mile of Layton, and Route 64 within ½ mile of Northway
Route 76 – On Bluemound Rd. from 68 th to 76 th	Route 65 within ½ mile of Hawley and Route 70 within ½ mile of 68 th

The trip based routes identified for elimination, i.e., freeway flyer routes and school routes, are outside the area defined as being either predominantly minority and low-income. Most of these riders would still have access to alternative service, although their travel time would be longer.

Freeway Flyer routes are premium routes that provide limited stop express service from suburban Park & Ride (P&R) lots to the central business district via the freeway. These routes occasionally also have suburban on-street stops spaced at least every half of a mile along major roadways. These routes only operate during weekday rush hours and require a premium surcharge for traveling along the freeway portion of the route.

School oriented routes are local fixed routes that operate limited schedules on school days only. While these routes are designed with the school as the primary major destination, these routes may still be used by anyone to travel to or from any stop that these routes serve.

Route Eliminated & Location served	Service Type & Fare* Of Eliminated Route	Available Alternative Service	Approximate increase in travel time (in minutes)	Service Type & Fare* Of Alternative Route
Route 40 – Ryan P&R	Freeway Express / Premium	None	N/A	N/A
Route 40 – College P&R	Freeway Express / Premium	Route 19 or 20	8	Local
Route 43 – Whitnall P&R	Freeway Express / Premium	Route 28	33	Local
Route 43 – Stops on 108 th , Grange, and Forest Home	Freeway Express / Premium	None	N/A	N/A
Route 44 – Fair Park P&R	Freeway Express / Premium	Route 76	12	Local
Route 44 – Stops south of Greenfield Ave.	Freeway Express / Premium	Various local routes	14-19	Local
Route 46 – Southridge P&R	Freeway Express / Premium	Route 14	11	Local
Route 46 – Loomis P&R	Freeway Express / Premium	None	N/A	N/A
Route 46 – Holt P&R	Freeway Express / Premium	Route 80	7	Local
Route 48 – Cudahy/S. Milwaukee	Freeway Express / Premium	Route 51	13-17	Local
Route 48 – Oklahoma Avenue	Freeway Express / Premium	Route 15	8	Local
Route 49 – Green Bay P&R	Freeway Express / Premium	Route 65	32	Local
Route 49 – Brown Deer P&R	Freeway Express / Premium	None	N/A	N/A
Route 49 – Northshore P&R	Freeway Express / Premium	Route 10 or 15	14-19	Local
Route 50 – Morgan Avenue	Local	Various cross routes within ¼ mile, no east-west alternative	Varies	No Change
Route 85 – Whitman & Wauwatosa West schools	Local	Routes 10, 28	Varies	No Change
Route 87 – Nathan Hale HS	Local	Routes 28, 53	Varies	No Change
Route 88 – Cudahy schools	Local	Route 55	Varies	No Change
Route 89 – St. Francis schools	Local	None	N/A	N/A

*Local fare: \$2.25 for adults, \$1.10 for children, seniors and disabled

*Premium fare: Applicable local fare + surcharge of \$1.00 for adults, \$0.50 children, seniors and disabled.

Identification of Measures to Mitigate Adverse Service Changes

During the process of restructuring service, MCTS endeavored to avoid adversely affecting the minority and low-income community. Noting how few outright eliminations of service were made in these areas validated this effort. Nonetheless, there will be reductions in the frequency of service. MCTS will need to inform the affected communities so there is a reasonable transition from the existing to the proposed changes in service.

Determination of Disproportionate Adverse Impacts

As previously indicated, MCTS chose to use the four-fifths rule to measure whether a disproportionate adverse impact would exist if the proposed changes in service were implemented. The data indicated the ratio of average percent reduction in service between the minority and non-minority community was 0.77 (-10.39 / -13.43). While this ratio might indicate a disproportionate adverse impact, the greater adverse impact is on the non-minority community who will experience greater levels of service reduction than the minority community. The ratio of the average percent reduction in service between the low-income and non low-income community was 0.94 (-14.53 / -15.51). This ratio is greater than 0.80 (four / fifths) indicating relatively little difference in adverse impact between these communities. Given these results, the proposed changes would not have a disproportionate adverse impact on the minority or low-income population.

Outreach and Involvement to Minority and Low Income Communities

Milwaukee County and MCTS have used a variety of methods to invite the public to learn about major service changes during the budget process. These methods include informational meetings that are hosted by the County Executive and County Supervisors. MCTS would provide information in several formats: passenger newsletters and announcements, press releases, special signage at bus stops affected by the routing change, as well as posting material on the MCTS website (ridemcts.com) and the customer call center phone line.

Consideration of Outreach to Limited English Proficiency (LEP) Communities

The largest LEP community in Milwaukee County consists of people whose primary language is Spanish (4.79%), based on the latest available census data. MCTS has partnered with four community organizations that work with people who have a limited proficiency in English.

- United Community Center
- Archdiocese of Milwaukee, Office for Multicultural Services
- Council for the Spanish Speaking, Adult Education Program
- Council for the Spanish Speaking, Housing Department

It would be our intent to work with these groups to inform the LEP community of proposed changes in service as a result of the budget cutbacks.

**Milwaukee County Transit System
Interoffice Memorandum**

TO: File

FROM: Tom Winter

SUBJECT: Title VI Fare Equity Analysis - New Fare Collection System

DATE: July 21, 2014

The Federal Transit Administration (FTA) requires transit providers to conduct an analysis of any change in fares to determine whether these changes will have a disparate impact on Title VI protected groups, i.e., minority and low-income populations. MCTS is in the process of replacing and upgrading its existing fare collection system with a smart card based fare collection system that is designed to eventually machine-validate all fares. The new system is expected to be operational in third quarter 2014. Referred to as a “fare equity analysis”, this information must be included in Milwaukee County’s overall Title VI program that is submitted to the FTA.

Background on New Fare Collection System

The primary feature of the new fare collection system will be introduction of “smart cards”. Smart cards will be able to be loaded with weekly and/or monthly passes or any cash value via an internet revaluing portal (IRP) or at a retail fare outlet. A one-day pass will be also allowed to be loaded on a smart card at the farebox on the bus. This system will allow the replacement of existing paper tickets, paper transfers, and paper weekly / monthly period (flash) passes. MCTS will continue to collect cash fares, but cash and coins will be validated, rather than registered. Details about fare forms and the distribution of fare forms are as follows:

Pre-paid Stored Value – Stored value results from loading dollars onto a smart card. A passenger that chooses to pay with a smart card that is loaded with dollar value will see their stored value amount reduced with each fare that is paid. Using pre-paid stored value dollars from a smart card results in fare discounts that are similar to the current pricing of tickets.

Rolling Period Passes – 7 day and 31 day passes will replace weekly and monthly passes. They will be available at retail outlets and on-line via an internet revaluing portal.

Other Special Fares (Transfers) – Transfers will be available to persons with smart cards as soon as smart cards are used as fare forms on the bus. In addition, passengers that have a smart card with them will be able to have a transfer encoded on it even if they pay their fare with cash.

Smart Card Fare Forms Distribution – The distribution network under which smart cards and advance purchase fares will be available is being expanded from ready-fare retail outlets to also include an internet revaluing portal and the farebox, as described below:

- Internet Revaluing Portal: The IRP will allow passengers with access to the internet and possession of a credit card to purchase fare forms on-line. It will also be possible for a passenger to set up an account that will permit their smart card to be automatically loaded with additional dollar stored value amounts or transit passes whenever needed, provided that they have a valid credit card on file.
- Smart media attended revaluing device (SMARD): A SMARD consists of a counter-top tablet computer and smart card reader/writer that will permit the loading of pre-purchased dollar stored value and transit passes directly onto a smart card. A network of retail outlets will be provided with SMARDs.
- Farebox: One-day passes can be loaded onto a smart card at the farebox when a passenger pays with cash or stored value. This will be a new fare form for MCTS.

Description of Fare Equity Analysis and Definitions

The basic steps in the fare equity analysis are as follows:

- Develop a disparate impact policy and a disproportionate burden policy with input from the public
- Examine fare use patterns for both minority riders and low income riders (the percent of riders for each fare type)
- Review the current and proposed change in fares
- Assess the impacts of the proposed change in fares
- Determine if there is a finding of a disparate impact or disproportionate burden
- If necessary, examine alternatives or modify the proposal to mitigate the impact or burden

A disparate impact is “neutral policy or practice that disproportionately affects members of a protected class identified by race, color, or national origin.” It exists where a transit provider’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives, but with less disproportionate effect on the basis of race, color, or national origin. A disproportionate burden refers to “a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.”

Disparate Impact Policy and Disproportionate Burden Policy

MCTS uses the four-fifths rule as the threshold for measuring whether minority riders are bearing a disparate impact of adverse effects of a fare change or whether low-income riders are bearing a disproportionate burden of such a fare change. The four-fifth’s rule is a method of calculating how much one group is impacted compared to another group. Specifically, a disparate impact has occurred when the ratio of the reduction in service or the ratio of the percent change in fares in the minority group compared to the non-minority group is below four-fifths (0.80) or 80%. Similarly, a disproportionate burden has occurred when the ratio of the reduction in service or the ratio of the percent change in fares in the low income group compared to the non-low-income group is below four-fifths.

Fare Use Patterns by Passenger Group

MCTS obtained fare use data collected by the Southeastern Wisconsin Regional Planning Commission (SEWRPC). They distributed an extensive on-bus travel survey to MCTS passengers in October and

November 2012. The survey was conducted on all regular and freeway flyer service. Passengers were specifically asked how they paid for their trip. The results of the survey are shown in Table 1.

Table 1.
Fare Usage on MCTS Fixed Route Service by Group.

	% Minority	% Non – Minority	% Low Income	% Non –Low Income	% of Total
In Total	70	30	43	57	99
Weekly Pass Passengers	28.0	15.8	26.0	23.2	24.5
Ticket Passengers	23.6	19.7	21.6	23.1	22.4
UPASS/MPS	17.1	28.9	23.5	18.3	20.4
Cash Passengers	18.4	14.0	16.2	17.9	17.2
Monthly Pass Passengers	6.5	11.5	6.8	8.9	8.0
CVP Passengers	1.6	4.6	1.4	3.5	2.6
Half Cash Passengers	1.7	2	1.8	1.7	1.8
Paper Transfer Passengers	1.4	1.6	1.5	1.3	1.5
Non-response/Free	1.9	1.2	1.1	1.5	1.0
New Freedom Pass	0.2	0.4	0.3	0.1	0.3

Note: Data obtained from SEWRPC 2012 on bus passenger survey. Low-income status was determined by SEWRPC using 2012 U.S. Department of Health and Human Services Poverty Guidelines.

Review of Current and Proposed Fare Changes with the New Fare Collection System

The 2015 budget for transit, if adopted as proposed, will begin implementation of the new smart card fare forms (assuming the new project progresses into installation through operability testing and passes final acceptance testing). The most important aspect of this transition is that there are no changes to existing cash fares, advance purchase fares, special fares, or paratransit fares (Table 2).

Table 2.
2014 MCTS Operating Budget – Current and Proposed Fare Types

Proposed Fare Name	Current Fare	Proposed Fare	Change in Fare? / Comments
Cash Fares			
Adult	2.25	\$2.25	No change in fare
Premium	3.25	\$3.25	No change in fare
Concession (Half-Fare)	1.10	\$1.10	No change in fare
Advance Purchase Fares			
Adult Tickets	10/\$17.50	\$1.75	No change in fare. Value deduction smart card replaces paper tickets
Premium Tickets	10/\$23.50	\$2.35	No change in fare. Value deduction smart card replaces paper tickets
Concession (Half-Fare) Tickets	10/\$11.00	\$1.10	No change in fare. Value deduction smart card replaces paper tickets
Pass Fares			
1-Day Adult Pass	New Product	\$4.00	Purchased in advance at ready fare outlet
1-Day Adult Pass	New Product	\$5.00	Loaded on existing smart card at farebox
1-Day Premium Pass	New Product	\$6.00	Purchased in advance at ready fare outlet or loaded on existing smart card at farebox
1-Day Concession Pass	New Product	\$2.00	Purchased in advance at ready fare outlet
1-Day Concession Pass	New Product	\$3.00	Loaded on existing smart card at farebox
3-Day Adult Pass	New Product	\$12.00	Purchased at ready fare outlet
3-Day Premium Pass	New Product	\$18.00	Purchased at ready fare outlet
3-Day Concession Pass	New Product	\$6.00	Purchased at ready fare outlet
3-Day Concession Prem. Pass	New Product	\$9.00	Purchased at ready fare outlet
7-Day Adult Pass	\$17.50	\$17.50	No change in fare. Replaces paper calendar pass. Avail. at ready fare outlets or on-line
7-Day Premium Pass	New Product	\$24.00	Purchased at ready fare outlet or on-line
7-Day Concession Pass	New Product	\$11.00	Purchased at ready fare outlet or on-line
31-Day Adult Pass	\$64.00	\$64.00	No change in fare. Replaces paper calendar pass. Avail. at ready fare outlets or on-line
31-Day Premium Pass	New Product	\$85.00	Purchased at ready fare outlet or on-line
31-Day Concession Pass	New Product	\$32.00	Purchased at ready fare outlet or on-line
Other Special Fares			
Student Pass	\$16.50	\$16.50	No change in fare. Valid weekdays, available to schools only
UPASS	\$45.00	\$45.00	No change in fare (value per semester)
Commuter Value Pass	\$201.00	\$201.00	No change in fare (value per quarter)
New Freedom Pass	Free	Free	Free to eligible paratransit clients
Transfer	Free	Free	When paying cash, a transfer can be encoded on smart card
Paratransit Fare	\$4.00	\$4.00	No change in fare. (per one way trip)

Assessment of the Impact / Process Used to Analyze New Fare Forms

The proposed changes that would occur with the transition to new fare forms have to do with the mechanisms that some fares are made available. As was noted earlier, paper tickets (adult, premium, and half-fare) would no longer be available as they would be purchased and encoded on a smart card. A similar change would occur for passengers that use student passes, UPASS, Commuter Value Pass, and the New Freedom pass. Weekly and monthly paper passes will be replaced with rolling - period passes, i.e., 7 day and 31 day, respectively, which will also be encoded on the smart card. Finally, paper transfers will be replaced as they will be encoded onto a passenger's smart card.

Passengers that pay with cash are currently eligible for a paper transfer that is issued by the bus operator. The transfer allows the passenger to ride free on another bus within a 60 minute timeframe. The new fare collection system will move MCTS towards machine validation of all fare forms, which means the eventual discontinuation of paper transfers. As the elimination of paper transfers would require passengers who pay with cash or tickets pay an additional fare (depending on the number of transfers needed), staff completed an analysis of the impact this would have on minority and low income passengers.

MCTS used the following process to analyze the impact of an increase in fares and to determine if a disparate impact exists as a result:

1. Determine the percent usage for both minority and non-minority passengers for each fare type.
2. Compare the percent usage for both the minority group and the non-minority group to see which has the higher use for each fare type:
 - a. If the percent usage by minority passengers is higher than for non-minority passengers, an impact ratio is calculated that is equal to the percent use by non-minority passengers divided by the percent use of minority passengers.
 - i. If the ratio is less than 0.80, the 4/5ths rule threshold has been crossed and a disparate impact exists. If the ratio is greater than 0.80, a disparate impact does not exist.
 - b. If the percent usage by minority passengers is lower than for non-minority passengers, the impact ratio is scored as 100%, i.e., the impact of the fare increase will be greater on non-minority passengers than on minority passengers.

The same process would be followed to determine if a disproportionate burden existed for persons with low incomes.

Analysis of the Impact of Eliminating Paper Transfers: Cash and Tickets

The percent of minority passengers that pay with cash (18.4%) exceeds that for non-minority passengers (14.0%) (Table 1). The impact ratio would be 0.76 (14.0 / 18.4) and a disparate impact would technically exist as it is below 0.80. As regards ticket usage, 23.6% of minority passengers use tickets while the percent usage by non-minority passengers is 19.7. In this case, the ratio is 0.83 (19.7 / 23.6) and there would not be a finding of a disparate impact.

As regards to income levels, the percent of low income passengers that pay with cash (16.2%) is less than that for non-low-income passengers (17.9%) (Table 1). Similarly, the percent of low income passengers

that pay with tickets (21.6%) is less than that for non-low-income passengers (23.1%). In both cases, the impact ratio is 100% and a disproportionate burden does not exist.

Requirement to Mitigate Disparate Impacts / Disproportionate Burdens

FTA requires transit systems that determine a finding of a disparate impact or a disproportionate burden must take actions to minimize or mitigate the impact. As was noted, MCTS identified that a disparate impact would occur for minority passengers who pay with cash and use a transfer under the proposed new fare collection system. Consequently, MCTS will take the following actions to minimize or mitigate this impact:

- Passengers will be able to present a blank smart card to the bus operator who can encode a transfer onto the card after receipt of the full cash fare. MCTS will distribute smart cards for free for a limited period of time throughout the community.
- After the initial ‘free card’ period, smart cards will be available for \$2.00. Since smart cards are reusable for a period of many years, the cost is not considered prohibitive.
- MCTS will oversee an extensive effort to educate the passengers and the public of the cost benefits of using smart cards versus using cash.

Additional Analysis of the New Fare Collection System – Change in Access to Retail Outlets

MCTS also analyzed the impact of a proposal to reduce the number of retail outlets where passes are sold to see if there would be a disparate impact or disproportionate burden on minority or low income passengers. While geographic access to outlets is not specifically mentioned in the FTA Title VI Circular 4702.1B, it was felt this issue should be analyzed as it fits in with the intent of the guidance.

MCTS’ current network of outlets includes approximately 250 locations. These sites include grocery stores, banks, pharmacies, universities, and municipal offices. The transition to the new fare collection system is proposed to reduce the number of outlet locations to approximately 100. In the past, no special infrastructure was needed to approve a location as a retail outlet. Under the new system, outlets will need internet data connections to allow customers to load funds onto their smart card or to purchase fares. This will require outlets have specialized computer equipment (SMARD’s). Therefore, MCTS had to balance the amount of sales at an outlet versus the cost of equipping the outlet with a SMARD. Despite this reduction, MCTS made sure to maintain outlets in areas of high residential density and high bus ridership.

A GIS analysis indicated that 65% (161) of outlets are in minority census tracts and 35% (86) are in non-minority tracts. Under the proposed plan, the number of outlets in minority census tracts would decrease 64% and there would be 50% reduction in non-minority tracts. The impact ratio would thus be 0.78 (50 / 64) and a disparate impact would exist as it is below 0.80.

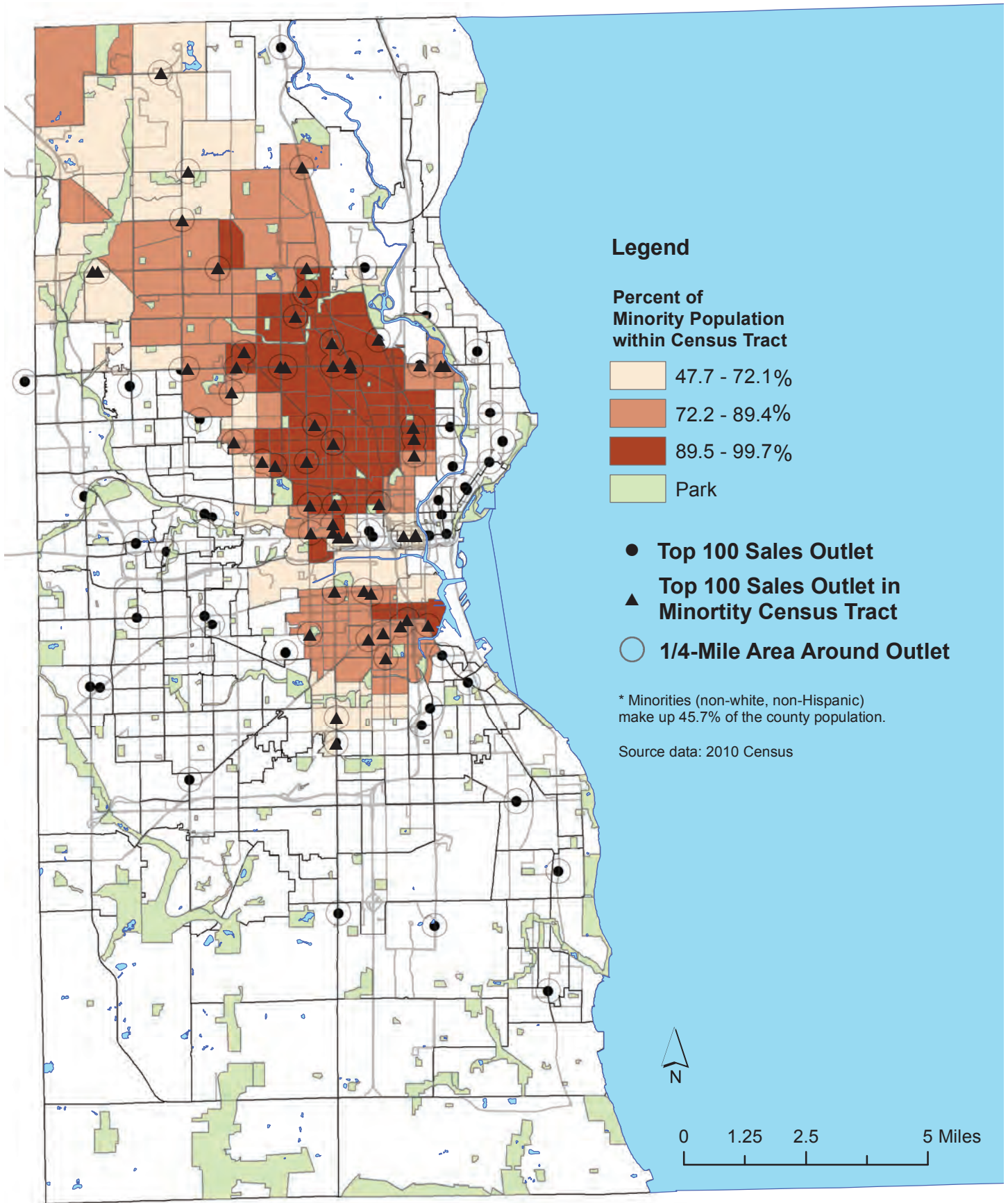
As regards income measures, 58% are in low income census tracts and 42% are in non-low-income tracts. Under the proposed plan, the number of outlets in low income census tracts would decrease 62% and there would be 53% reduction in non-minority tracts. The impact ratio would thus be 0.85 (53 / 62) and a disproportionate burden would not exist.

Requirement to Mitigate Disparate Impacts / Disproportionate Burdens

As was noted earlier, the FTA requires transit systems that determine a finding of a disparate impact or a disproportionate burden take actions to minimize or mitigate the impact. Consequently, MCTS will take the following actions to minimize or mitigate the impacts / burdens described earlier with regard to the proposed reduction on retail outlets:

- MCTS can expand the number of SMARD's in minority census tracts. This change will negate the finding of a disparate impact.
- Passes will be made available from the phone for persons who do not have access to the internet.
- The smart card will be made capable of being loaded with two 7-day passes at one time, which reduces the total number of trips to retail outlets to purchase weekly passes.

Proposed MCTS Sales Outlet Locations Compared to Percent of Minority Population within Census Tract



Proposed MCTS Sales Outlet Locations Compared to Percent of Low-Income Population within Census Tract

