

November 2001

TRANSIT LABOR ARRANGEMENTS

Most Transit Agencies Report Impacts Are Minimal

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United States General Accounting Office
Washington, D.C. 20548

November 19, 2001

The Honorable Phil Gramm
Ranking Minority Member
Committee on Banking, Housing, and Urban Affairs
United States Senate

The Honorable Wayne Allard
Ranking Minority Member
Subcommittee on Housing and Transportation
Committee on Banking, Housing, and Urban Affairs
United States Senate

The Honorable Mike Crapo
United States Senate

Over the last several years, there has been renewed concern about the 37-year old statutory provision commonly known as Section 13(c)— codified as section 5333(b) of title 49 U.S. Code. Before the Federal Transit Administration (FTA) may make grants to transit applicants, Section 13(c) requires that the Department of Labor (DOL) certify that fair and equitable arrangements are in place to protect mass transit employees affected by federal assistance. Section 13(c) requires that the arrangements contain provisions for, among other things, the continuation of collective bargaining rights and the protection of employees against a worsening of their positions. Once certified, the arrangements are incorporated into the grant agreement between FTA and the grantee. Critics of Section 13(c) have claimed that it greatly increases the cost of transit operations, hinders transit agencies' efforts to adopt new technology, and creates constraints on the efficient operation of transit systems. However, supporters have claimed that Section 13(c) has enhanced labor-management stability and has on occasion helped to improve communication and working relationships between management and labor.

You requested that we assess the impact of Section 13(c). We agreed with your office to assess the impact of Section 13(c) on labor costs and the technological and operational management of transit agencies—aspects of transit operations industry officials identified as most likely to be affected by Section 13(c). We also agreed to assess the impact of Section 13(c) on the timely receipt of federal transit grants, as well as the burden of complying with Section 13(c) relative to other federal grant requirements. To address this request, we reviewed relevant studies and the legislative

history of Section 13(c), interviewed federal agency and union officials, and conducted a nationwide mail survey of the 105 largest transit agencies in April 2001. We received responses to our survey from 92 transit agencies for a response rate of 88 percent. Our survey instrument and overall results are included in appendix I.

Results in Brief

Except for their ability to contract out for transit services, the transit agencies we surveyed generally reported that Section 13(c) has had a minimal impact on their (1) labor costs, (2) ability to adopt new technologies, and (3) ability to modify transit operations. Transit agencies reported that Section 13(c) has delayed the award of federal grants and has presented a burden regarding time, efforts, and resources. Transit officials said that growth in the transit industry may act to mitigate the effects of Section 13(c).

- Most transit agencies that responded to our survey indicated that Section 13(c) had a minimal impact on labor costs. Although labor costs account for the largest share of operating costs in the transit industry, and critics have suggested that Section 13(c) raises labor costs, 68 percent of the transit agencies reported that Section 13(c) did not affect their labor costs. Twenty-seven percent reported that Section 13(c) had somewhat increased their labor costs, and 4 percent reported that Section 13(c) had greatly increased labor costs.
- Similarly, most transit agencies reported that Section 13(c) had a minimal effect on their ability to adopt new technologies. Eighty-five percent of the agencies reported that, in general, Section 13(c) did not affect their decisions whether to adopt new technologies. Further, Section 13(c) had a minimal impact on their decisions whether to adopt specific technologies. For example, of the 76 agencies that considered adopting a computer assisted dispatching and scheduling system, only 2 indicated that Section 13(c) influenced their decisions whether to adopt that technology.
- Most agencies reported that Section 13(c) was not a factor in their decisions whether to modify operations. When agencies indicated that they had considered changes in their transit operations, on average 81 percent of those decisions were not influenced by Section 13(c). Further, 63 percent of the transit agencies reported that Section 13(c) did not have any effect on their relations with the unions representing their employees. Thirty-four percent of the transit agencies reported that Section 13(c) made relations with their unions more contentious,

and 3 percent of the transit agencies reported that Section 13(c) made their labor relations more amicable.

Transit officials we interviewed suggested that growth in the transit industry may act to mitigate the impact of Section 13(c) by allowing transit agencies to adopt labor-saving technology and modify transit operations without displacing or dismissing employees. In addition, 85 percent of the transit agencies we surveyed reported that they would be required to engage in collective bargaining independent of Section 13(c) and its requirement to continue collective bargaining rights. Some collective bargaining agreements contain provisions similar to those found in Section 13(c) arrangements and thus make isolating the impact of Section 13(c) difficult.

Although transit agencies generally reported that Section 13(c) had a minimal impact on their management of operations, many reported that Section 13(c) impeded their ability to contract out for fixed-route transit services. Historically, one of the major concerns of Section 13(c) critics is that it impairs the ability of transit agencies to contract out for transit services. Forty-six percent of the transit agencies responded that Section 13(c) made it somewhat or much more difficult to contract out for fixed-route services. However, some of the officials we interviewed suggested that Section 13(c) does not directly limit an agency's actual ability to contract out; instead, the threat of problems related to Section 13(c) discourages agencies from pursuing the use of contracting out for transit services.

Transit agencies have argued that Section 13(c) requirements result in delays in grant application processing. Fifty-seven percent of the transit agencies responding to our survey reported that Section 13(c) greatly or somewhat delayed the award of a transit grant. However, transit agencies' experiences with delays did not always correspond to satisfaction with grant application processing, as only 24 percent of transit agencies were either somewhat or greatly dissatisfied with the timeliness of FTA's grant processing; and only 29 percent were either somewhat or greatly dissatisfied with the timeliness of DOL's grant processing.

When asked about the difficulty imposed by Section 13(c) compared to other standard federal requirements for transit grant applicants regarding time, effort, and resources, 30 percent of the transit agencies surveyed reported that it was either somewhat or very difficult to meet Section 13(c) requirements. However, a larger percentage of transit agencies indicated

that certain other federal requirements were burdensome. For example, over 70 percent of the survey respondents reported that it was somewhat or very difficult to comply with the requirements of the Disadvantaged Business Enterprise program and the Americans with Disabilities Act.

In the returned questionnaires, we observed that transit agencies' responses concerning difficulties with contracting, delays in the receipt of federal grants, or fulfilling Section 13(c) requirements did not show any pattern regarding agency size, structure, or location.¹

Generally, the transit agencies we surveyed indicated that it would be useful for FTA and DOL to undertake some actions to ease the burden of fulfilling Section 13(c) requirements, such as providing information on best practices in transit agencies and providing information about Section 13(c) on FTA and DOL Web sites. DOL has advised us that compliance information on the Section 13(c) program is included on its Web site, as well as on the FTA Web site.

We provided a draft of this report to the Secretary of Transportation and the Secretary of Labor. Neither agency had substantive comments; however, both provided technical comments that we incorporated into this report as appropriate.

¹ The number of responses we received does not support a reliable statistical assessment of the characteristics of transit agencies who reported difficulties.

Background

In 1964, Congress passed the Urban Mass Transportation Act to provide financial assistance to states and local governments to extend and improve urban mass transportation systems beleaguered by rising costs and declining ridership. The provisions commonly called Section 13(c) were included to protect employees who might be adversely affected by industry changes resulting from financial assistance under the act. One specific concern was that if municipalities and other public entities used federal assistance to purchase failing private transportation providers, the employees could lose their jobs, collective bargaining rights, or other rights they had gained through collective bargaining.² For example, prior to the passage of the act, transit employees in Dade County, Florida lost their collective bargaining rights; and subsequent decisions regarding wages, hours, and working conditions were made unilaterally after their employer was acquired by a public transit authority. Another concern leading to Section 13(c) was that technological advances made with federal assistance would reduce the need for transit labor.

Section 13(c) is unusual in that two federal agencies administer it: DOT and DOL. Section 13(c) requires that DOL certify that fair and equitable labor protection arrangements are in place before DOT makes grants to transit applicants. Such labor protection arrangements are to provide for (1) the preservation of rights, privileges, and benefits under existing collective bargaining agreements; (2) continuation of collective bargaining rights; (3) protection of employees against a worsening of their positions with respect to their employment; (4) assurances of employment to employees of acquired mass transportation systems and priority of reemployment for employees terminated or laid off; and (5) paid training or retraining programs.

²As public employees, they would not be covered under the National Labor Relations Act (NLRA). Because states and municipalities are exempt from NLRA, public transit agencies would not be required to bargain collectively with the transit unions or honor existing collective bargaining agreements unless required to do so under state laws. In addition to collective bargaining rights, employees could potentially lose the right to strike and lose pension and retirement benefits.

In carrying out its responsibilities, DOL ensures that the protective terms are in place through Section 13(c) arrangements, which are incorporated within a transit agency's grant agreement with DOT. The DOL certification process begins when FTA forwards a grant application to DOL.³ DOL refers the grant application and recommended terms and conditions to the unions representing transit employees in the service area of the project and the transit agency applying for the grant. No referral is made when (1) employees in the service area are not represented by a union or (2) the grant is for routine replacement items.⁴ After DOL referral, the parties review the proposed terms and conditions and submit objections, if any. If no objection is submitted, DOL issues a final certification based on the terms and conditions recommended to the parties. If an objection is submitted, DOL considers its validity. If DOL determines that the objection is not valid, it issues a certification that is based on the recommended terms and conditions. If it determines that the objection is valid, and it cannot be resolved through a technical correction, the parties are provided an opportunity to resolve disputed matters through negotiations. If they are unable to do so, DOL makes a determination after considering the objections of the parties. If the terms and conditions applied by DOL are not acceptable to the grant applicant, it may choose not to accept federal transit assistance.

After the certification process, employees who believe they have been adversely affected as a result of federal transit assistance may file claims under the procedures set forth in the Section 13(c) arrangements certified by DOL. The procedures for filing and resolving Section 13(c) claims vary according to each agreement, but they typically set forth (1) a time period for filing claims; (2) an informal process under which the parties can resolve disputes over claims; and (3) a formal dispute resolution process, such as binding arbitration, in the event that an informal settlement is not reached.

³ DOL has developed simplified processes for certain grant programs, such as for nonurbanized area formula grants. In addition, certain grants and loans for special needs of elderly individuals and individuals with disabilities do not require a labor protection certification.

⁴ If there is no union representing employees, DOL sets forth employee protective arrangements in a standard certification. For grants for the routine replacement of equipment of like kind and character, DOL applies preexisting terms and conditions unless the grant has a potential for a material effect on transit employees.

Section 13(c) Has Had Minimal Impact on Labor Costs at Most Transit Agencies

The agencies we surveyed generally reported Section 13(c) had a minimal impact on their labor costs. Critics have expressed concern that Section 13(c) hinders transit agencies' ability to lower labor costs, which, according to the American Public Transportation Association, account for over 80 percent of the operating expenses in the public transportation industry. In addition, some critics have stated that Section 13(c) has caused inflated wages and benefits in the transit industry. However, 68 percent of the transit agencies that responded to our survey reported that, in general, Section 13(c) had no effect on their labor costs. Twenty-seven percent reported that Section 13(c) had somewhat increased their labor costs, and 4 percent reported that Section 13(c) had greatly increased labor costs.

Moreover, a study by Rutgers University found that hourly transit wages for operators and mechanics rose very little in real terms and substantially less than average earnings per employee in other sectors of the economy from 1982 to 1997.⁵ When compared within metropolitan areas, transit wages (1) rose less than average earnings per employee in the manufacturing and government sectors, (2) were about the same as average earnings per employee in the transportation and public utilities sectors, (3) and rose much less than average earnings per employee in all other sectors of the economy. In addition, using data from 130 transit agencies, the Rutgers study found that mean top-wages for transit bus operators hovered at roughly the same level over the 1982 to 1997 period. (See table 1.)

⁵ Neal A. Denno and Martin E. Robins, *The Trend of Transit Labor Costs: 1982-97*. (New Brunswick, NJ: Alan M. Voorhees Transportation Center, Rutgers University, 2000), p.1.

Table 1: Mean Top-Wage Rates for Transit Bus Operators

	1982	1987	1992	1997
All agencies (N=130)	\$15.07	\$15.33	\$14.95	\$15.13
Large agencies (N=53)	\$16.74	\$16.85	\$16.37	\$16.54
Small agencies (N=77)	\$13.92	\$14.28	\$13.97	\$14.15
Agencies with rail service (N=22)	\$17.56	\$17.59	\$17.17	\$17.33

Note: Amounts in constant 1999 dollars.

Source: Neal A. Denno and Martin E. Robins, *The Trend of Transit Labor Costs: 1982-1997*. (New Brunswick, NJ: Alan M. Voorhees Transportation Center, Rutgers University, 2000), p. 5., calculated from APTA wage reports.

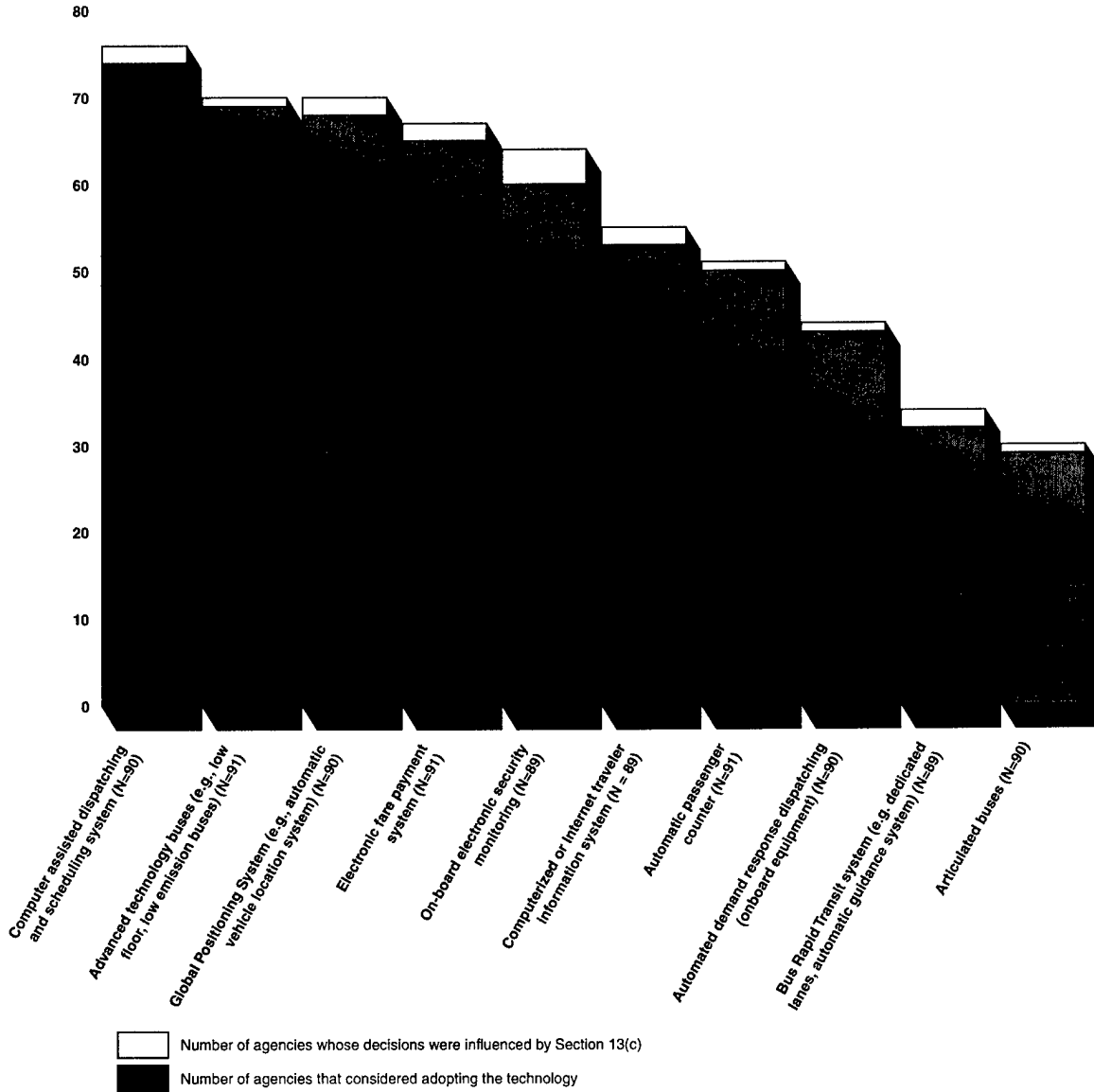
Section 13(c) could also affect a transit agency's costs through Section 13(c) claims. Section 13(c) arrangements typically establish a process whereby employees adversely affected by federal assistance can file claims against transit agencies, for example, for a dismissal allowance when employees lose their jobs. Claims may be filed for an individual or for a group of employees and claims filed in the last 5 years covered an average of 37 employees per claim. Eighty-seven percent of the transit agencies we surveyed reported that they have not had any Section 13(c) claims in the last 5 years. The remaining 12 agencies had an average of 3 claims filed during this period. Only eight of these agencies had Section 13(c) claims reach settlement, arbitration, or DOL decision. For those agencies, the average total amount paid per agency was \$188,067.

Section 13(c) Has Had No Influence on Most Transit Agencies' Decisions Whether to Adopt New Technologies

Critics of Section 13(c) have asserted that it creates disincentives for transit agencies to examine and adopt innovative technologies. However, 85 percent of the transit agencies surveyed reported that, in general, Section 13(c) did not affect their decisions on whether to adopt new technologies. In addition, we asked the transit agencies whether Section 13(c) had influenced their decisions whether to adopt specific technologies, including automatic passenger counters and electronic fare payment systems. For each technology we identified, few or none of the transit agencies surveyed indicated that Section 13(c) had influenced their decisions on whether to adopt the technology. For example, of the 65 agencies that had considered adopting onboard electronic security monitors, 4 indicated that Section 13(c) influenced their decisions whether to adopt that technology. Only 1 of the 30 agencies that had considered using articulated buses indicated that Section 13(c) influenced their decisions whether to adopt that technology. Of the 71 agencies that

considered using a global positioning system, 2 indicated that Section 13(c) influenced their decision whether to adopt that technology; however, officials who identified Section 13(c) as influencing their decisions did not offer any explanation for why Section 13(c) proved problematic in these cases. (See fig. 1.)

Figure 1: The Impact of Section 13(c) on the Adoption of New Technologies



Source: GAO.

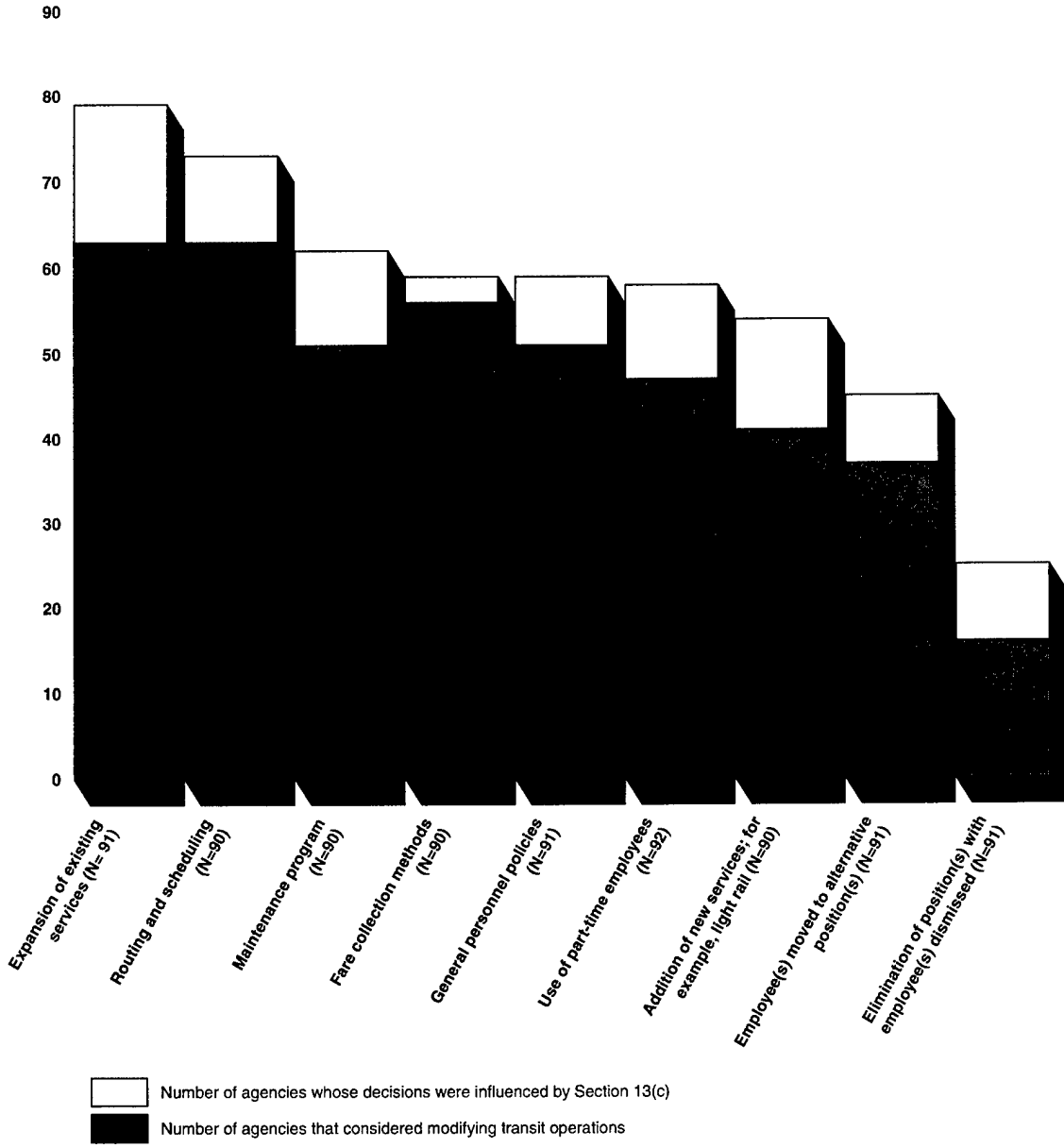
In addition, some officials suggested that the impact of Section 13(c) on transit agencies' decisions concerning technology may be limited because many transit systems are experiencing growth. According to the American Public Transportation Association (APTA), over the past 5 years, transit ridership has grown 21 percent. Consequently, transit agencies may be able to adopt labor-saving technologies without dismissing or displacing employees. Of the transit agencies we surveyed, 10 percent reported that they have fewer employees now than 5 years ago; and 84 percent reported that they have more employees now than 5 years ago. The remaining transit agencies reported no change in the number of employees.

Section 13(c) Minimally Influenced Transit Agencies' Operations, Except for Contracting

The transit agencies we surveyed generally reported that Section 13(c) had a minimal impact in some selected areas of their operations, including their decisions to modify transit operations and their relations with their unions. However, the agencies reported a greater impact due to Section 13(c) on their ability to contract for transit services.

Critics of Section 13(c) have stated that it creates disincentives for transit agencies to modify their operations. However, transit agencies generally reported that Section 13(c) did not influence their decisions in this area. We asked transit agencies to identify which of nine operational areas they had considered modifying, and whether Section 13(c) had influenced their decisions on whether to implement changes. When agencies indicated that they had considered changes in their transit operations, on average 81 percent of those decisions were not influenced by Section 13(c). (See fig. 2.)

Figure 2: The Impact of Section 13(c) on the Modification of Transit Operations



Source: GAO.

The majority of transit agencies we surveyed also reported that Section 13(c) generally did not affect their relations with the unions that represented their employees. For example, when asked whether Section 13(c) had caused their relations with the unions to become more amicable or more contentious, 63 percent of the agencies reported that Section 13(c) had not had any effect. Thirty-four percent of the agencies reported that Section 13(c) had made relations with the unions more contentious, and the remaining 3 percent reported that Section 13(c) had made their labor relations more amicable. In addition, 85 percent of the transit agencies we surveyed reported that they would be required to engage in collective bargaining independent of Section 13(c) and its requirements to continue collective bargaining rights. Some collective bargaining agreements contain provisions similar to those found in Section 13(c) arrangements and thus make isolating the impact of Section 13(c) difficult.

Although Section 13(c) had a minimal impact on most areas of transit operations we identified, many transit agencies we surveyed indicated that it had affected their ability to contract for fixed-route transit services.⁶ For example, 46 percent indicated that Section 13(c) made it somewhat or much more difficult to contract out for fixed-route services. In contrast, 17 percent of the transit agencies indicated that Section 13(c) made it somewhat or much more difficult to contract out for paratransit services.⁷ A transit official we interviewed explained this difference by noting that employees represented by labor unions have historically operated fixed-route service, but paratransit services have historically been contracted out; thus, the continuation of contracting out paratransit services does not pose a problem.

In addition, some transit industry officials reported that although provisions of Section 13(c) arrangements may directly limit contracting out for services, more often agencies are discouraged from contracting out because of their perception that such action will cause problems, such as Section 13(c) claims or delays in the receipt of grants.

⁶ APTA defines fixed-route services as those provided on a repetitive, fixed-schedule basis along a specific route with vehicles stopping to pick up and deliver passengers to specific locations; each fixed-route trip serves the same origins and destinations.

⁷ APTA defines paratransit services as those involving passenger cars, vans, or buses with fewer than 25 seats, operating in response to calls from passengers or their agents to the transit operator. Paratransit is sometimes also referred to as "Demand Response" and "Dial-A-Ride."

Section 13(c) Can Delay Grant Awards, But Transit Agencies Were Generally Satisfied With the Timeliness of Grant Application Processing

Transit agencies have argued that Section 13(c) causes delays in application processing and the award of federal grants. As noted in our August 2000 report,⁸ when transit applications are not processed in a timely manner, transit benefits are delayed. In addition, a lack of predictability and consistency in processing times can make planning and project execution difficult for transit agencies. As we detailed previously, 93 percent of DOL's applications processed from January 1996 through April 2000 met DOL's internal 60-day processing goal.⁹ As we noted in the August 2000 report, because of inconsistencies in DOL and FTA databases we were unable to determine whether Section 13(c) labor certification requirements delayed the award of transit grants. However, 57 percent of the transit agencies we surveyed indicated that Section 13(c) had caused such delays.

Although a majority of the transit agencies indicated that Section 13(c) had caused delays, the transit agencies were generally satisfied with the processing of federal transit grant applications. Forty-eight percent of the transit agencies were either somewhat or very satisfied with the timeliness of FTA's grant processing, where 24 percent were either somewhat or very dissatisfied. The remaining were neither satisfied nor dissatisfied. Forty-two percent were either somewhat or very satisfied with the timeliness of DOL's grant processing, and 29 percent were either somewhat or very dissatisfied with the timeliness of DOL's grant processing. The remaining were neither satisfied nor dissatisfied.

Section 13(c) Identified As a Burden Less Often Than Other Federal Grant Requirements

Some of the transit agencies we surveyed indicated that Section 13(c) requirements for receiving financial assistance were a burden regarding time, effort, and resources. However, more agencies identified other requirements as burdensome. All of the transit agencies indicated that FTA and DOL could undertake some actions to ease the burden of fulfilling Section 13(c) requirements, such as providing information on best practices in transit agencies and providing information about Section 13(c) on FTA and DOL Web sites. DOL has advised us that compliance

⁸ *Transit Grants: Need for Improved Predictability, Data, and Monitoring in Application Processing* (GAO/RCED-00-260, Aug. 30, 2000).

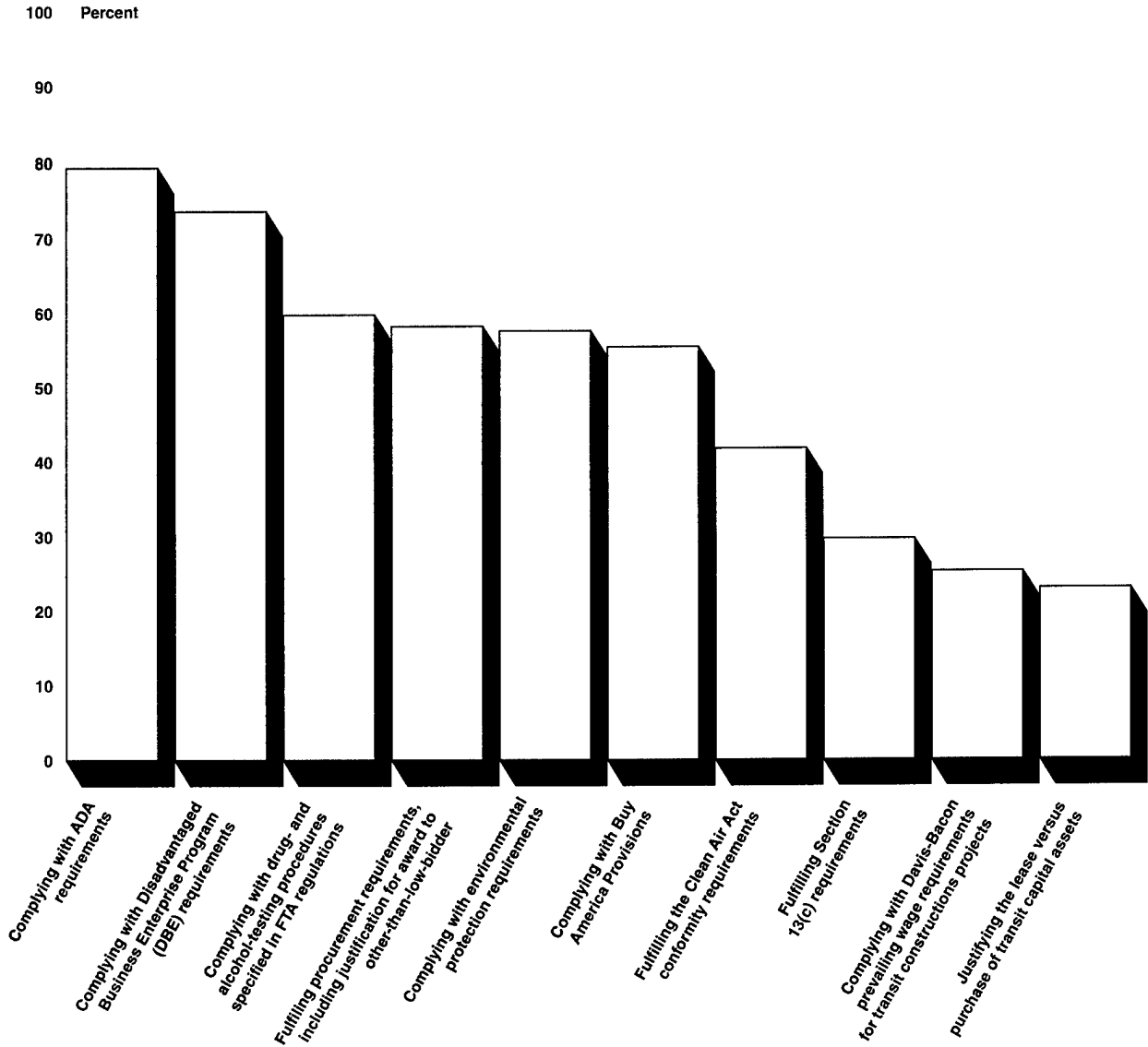
⁹ The percentage of certifications processed by DOL within 60 days is based on DOL processing time from the receipt of an application from FTA. DOL's calculation differs slightly because DOL does not start its 60-day clock until the agency finalizes initial processing and refers employee protective terms and conditions.

information on the Section 13(c) program is included on its Web site, as well as on the FTA Web site.

The transit agencies were presented with a list of 10 different federal requirements for receiving federal transit assistance and asked to indicate how easy or difficult it was to fulfill those requirements regarding time, effort, and resources. Thirty percent of the transit agencies we surveyed indicated that fulfilling Section 13(c) requirements was either somewhat or very difficult. Fifty-six percent indicated that fulfilling Section 13(c) requirements was neither easy nor difficult, and 14 percent indicated that fulfilling the requirements was somewhat or very easy.

More transit agencies we surveyed indicated that other federal requirements were burdensome. For example, 79 percent of the transit agencies indicated that complying with Americans with Disabilities Act requirements was somewhat or very difficult. Seventy-four percent of the transit agencies indicated that fulfilling Disadvantaged Business Enterprise program requirements was somewhat or very difficult. Figure 3 shows the percentage of agencies that indicated that the requirements were difficult to fulfill.

Figure 3: The Difficulty in Fulfilling Federal Requirements



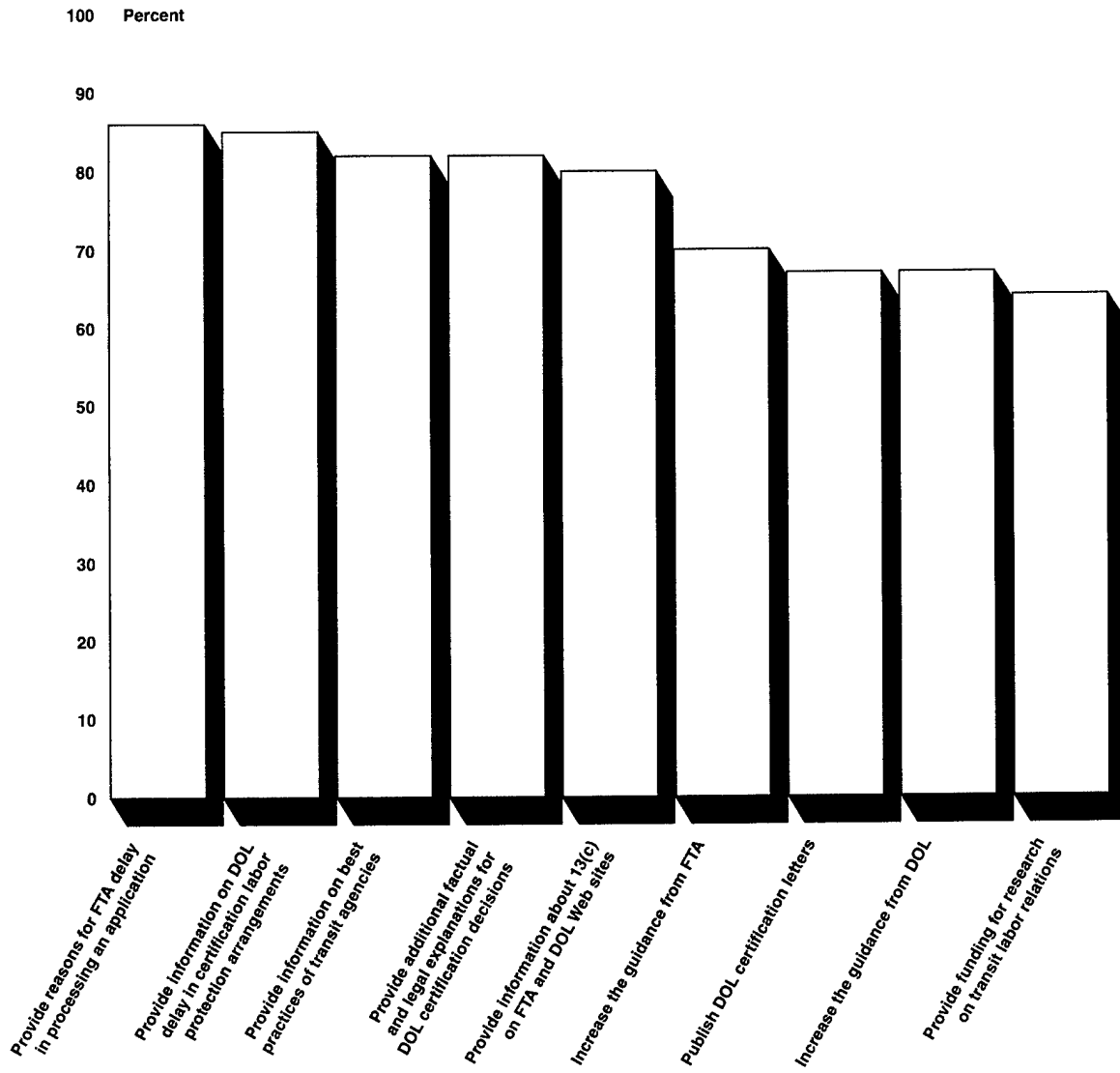
Source: GAO.

In the returned questionnaires, we observed that transit agencies' responses concerning difficulties with contracting, delays in the receipt of federal grants, or fulfilling Section 13(c) requirements did not show any pattern regarding agency size, structure, or location.¹⁰

Our survey respondents were provided a list of actions that FTA and DOL could undertake to help transit agencies with Section 13(c), and agencies were asked to indicate whether the actions would be useful or not useful. More than 50 percent of the transit agencies indicated that each of the nine actions listed would be definitely or probably useful. For example, 86 percent of the transit agencies we surveyed indicated that it would definitely or probably be useful if FTA were to provide information on delays in application processing. Similarly, 85 percent of the transit agencies we surveyed indicated that it would be definitely or probably useful if DOL were to provide reasons for delays in processing an application. Eighty percent indicated that it would be definitely or probably useful if DOL and FTA were to provide information about Section 13(c) on their Web sites. Figure 4 shows the percentage of agencies that indicated that the actions would be useful.

¹⁰ See footnote 1.

Figure 4: DOT and FTA Actions That Transit Agencies Said Would Be Useful in Fulfilling Section 13(c) Requirements



Source: GAO.

Observations

The transit agencies we surveyed generally reported that Section 13(c) has had a minimal impact on labor costs, adoption of technologies, and operations. However, a notable number of transit agencies reported that Section 13(c) has discouraged them from contracting for fixed-route transit services and has delayed their receipt of federal grants. In addition, although 30 percent of the transit agencies indicated that Section 13(c) is a burden on their time, efforts, and resources, more transit agencies indicated that certain other federal transit requirements were burdensome.

In the returned questionnaires, we observed that transit agencies' responses concerning difficulties with contracting, delays in the receipt of federal grants, or fulfilling Section 13(c) requirements did not show any pattern regarding agency size, structure, or location.¹¹

Two factors are relevant to understanding the impact of Section 13(c) on transit agencies. First, 85 percent of the transit agencies we surveyed reported that they would be required to engage in collective bargaining independent of Section 13(c) and its requirements to continue collective bargaining rights. Some collective bargaining agreements contain provisions similar to those found in Section 13(c) arrangements and thus make isolating the impact of Section 13(c) difficult. Second, 84 percent of the transit agencies reported that they have more employees now than 5 years ago. Officials we interviewed suggested that the growth of many transit agencies has reduced or eliminated the need to dismiss or displace employees when making technological or operational changes, thus potentially reducing the concern over the implications of such changes under Section 13(c).

Finally, the transit agencies indicated that some actions FTA and DOL could take, such as providing information about Section 13(c) on their Web sites and providing additional information about processing delays, would be helpful in fulfilling Section 13(c) requirements.

Agency Comments

We provided a draft of this report to the Secretary of Transportation and the Secretary of Labor. Neither agency had substantive comments; however, both provided technical comments that we incorporated into this report as appropriate.

¹¹See footnote 1.

Scope and Methodology

To determine the impact of Section 13(c), we reviewed relevant studies, interviewed federal agency and union officials, and surveyed the 105 largest transit agencies. To obtain background information on Section 13(c), we reviewed the legislative history of the Urban Mass Transportation Act of 1964 and interviewed officials at the APTA, FTA, DOL's Employment Standards Administration, the Amalgamated Transit Union, and the Transportation Workers Union. These officials shared their views on the costs and benefits of Section 13(c) as well as key information on the Section 13(c) certification process, the characteristics of transit agencies most likely to be affected by Section 13(c), and the history of Section 13(c).

To obtain the list of transit agencies to survey, we analyzed data from FTA's National Transit Database (NTD). From our interviews, we determined that larger transit authorities were more likely to have had relevant and reportable experiences with Section 13(c). First, larger transit agencies generally receive more federal financial assistance than smaller agencies. Second, the officials we interviewed reported that larger agencies were more likely to have employees represented by unions. Finally, DOL has simplified certification requirements for transit authorities not located in urbanized areas. Consequently, we requested that FTA officials provide us with a list of all transit providers that serve populations greater than 200,000 and that annually operate 100 or more revenue vehicles in maximum service.¹² In commenting on a draft of this report, FTA noted that smaller and nontraditional grantees that were not included in our list may also experience some difficulties in complying with Section 13(c).

We used the NTD, Internet searches, and telephone calls to exclude the following from our initial list: (1) transit agencies operating as subsidiaries of other transit agencies on our list, (2) transit agencies not receiving federal financial assistance, and (3) private organizations that provide purchased transit services to transit agencies already on our list. We also added to our list transit agencies that met our criteria but were not

¹² The number of revenue vehicles available to the general public and operated to meet the maximum service requirement for the fiscal year; based on 1999 data filed with the NTD.

included in the list provided from FTA because they had not filed with the NTD.¹³ Our final mailing list contained 105 transit agencies.

After we developed the list of 105 transit agencies to survey and developed a preliminary questionnaire, we pretested the survey with officials from nine transit agencies. The pretest participants were selected from transit agencies of different sizes operating in a variety of geographic areas. During the pretesting, we simulated the actual survey experience by asking the transit agency officials to complete the survey. We then interviewed the officials after they had completed the survey to ensure that (1) the questions were understandable and clear, (2) the terms used were precise, (3) the survey did not place an undue burden on agency officials, and (4) the survey was unbiased. On the basis of the pretesting, we incorporated appropriate changes into the final questionnaire.

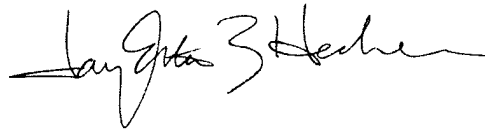
After mailing the questionnaire in April 2001, we sent three additional reminders in order to increase our response rate. First, we sent a postcard 1 week after the survey. Second, we sent a follow-up letter and a replacement questionnaire to nonrespondents 1 month after the initial mailing. Finally, we sent E-mail messages and placed telephone calls to nonrespondents during June and July 2001. We received questionnaires from 92 transit agencies, for a response rate of 88 percent.

We performed our review from December 2000 through October 2001 in accordance with generally accepted government auditing standards.

As arranged with your offices, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days after the date of this report. At that time, we will send copies to the Secretary of Transportation, the Secretary of Labor, and interested congressional committees. Copies will also be made available to others on request.

¹³Urbanized Area Formula Grant recipients are required to submit a report to the NTD. In addition, FTA encourages all transit agencies, regardless of whether they receive federal assistance, to file with NTD so that FTA will have a more complete depiction of mass transit in the United States.

If you have any questions about this report, please call me at (202) 512-2834 or contact me at heckerj@gao.gov. Major contributors to this report are listed in appendix II.



JayEtta Z. Hecker
Director
Physical Infrastructure Issues

GAO's Survey Instrument and Overall Results

U.S. General Accounting Office

GAO

Survey of the Impact of Transit Labor Arrangements On Transit Agencies

During Federal Fiscal Years (FFY) 1995-2000 (i.e., from 10/1/95 to 9/30/2000) did your transit agency receive a grant or grants from FTA that required you to obtain a Section 13(c) certification? *(Please check yes or no, then follow the instructions.)* N=96

- 4.2% No: You do not need to complete this questionnaire. Please return the uncompleted questionnaire using the enclosed envelope.
- 95.8% Yes: Please complete the questionnaire and return it to us using the enclosed envelope.

April 2001

U.S. General Accounting Office
441 G Street, NW
Washington, D.C. 20548-0001

**Survey of the Impact of Transit Labor Arrangements
On Transit Agencies**

Introduction

The U.S. General Accounting Office (GAO) has been asked by the Senate Committee on Banking, Housing and Urban Affairs to assess the impact of transit labor protection arrangements (often called "Section 13(c) arrangements") that must be in place to protect the interest of employees who may be affected by federal transit assistance.

As part of our study, we are surveying all transit agencies that serve populations over 200,000 and that operate 100 or more vehicles in maximum service.

Your cooperation is critical to our ability to provide current and complete information to the Congress.

If you have any questions, please contact Yvonne Pufahl at pufahly@gao.gov or (202) 512-3213 or Casey Brown at brownc@gao.gov or (202) 512-7445.

Instructions

Please Read Before Beginning

- As you fill out this questionnaire, please be sure that you consult with the person(s) in your agency with the most accurate information for each question.
- For definitions of terms not specifically defined in this questionnaire, please refer to those used in the National Transit Database.
- In order to ensure that your data are entered accurately, please use blue or black ink to write in your answers. Return the original copy of the completed questionnaire booklet to us.
- We suggest you make a copy of your answers for your records.
- Please return your completed questionnaire booklet to us, within three weeks of receipt, in the enclosed postage-paid envelope.
- If the return envelope is misplaced, return your questionnaire to:

Casey Brown
Mail Room 2A10
U.S. General Accounting Office
441 G Street, NW
Washington, DC 20548

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Part I

Background Information

1. **What is the total population of the standard metropolitan area(s) where your transit agency operates? (Please check one.) N=91**
 - 1.1% Less than 200,000
 - 17.6% 200,000 – 499,999
 - 22.0% 500,000 – 999,999
 - 35.2% 1,000,000 – 2,499,999
 - 24.2% 2,500,000 or more

2. **Which of the following services does your transit agency provide (either directly, by contracting out, or by pass through of funds)? (Please check all that apply.) N=92**
 - 96.7% Bus (Motor bus or Trolleybus)
 - 9.8% Commuter Rail
 - 19.6% Light Rail
 - 12.0% Heavy Rail
 - 88.0% Paratransit
 - 34.8% Vanpool
 - 1.1% Jitney
 - 5.4% Ferryboat
 - 7.6% Other *Please specify:*

3. **What percentage of your transit services are contracted out? (Please check one.) N=77**
 - 11.0% 100% → *Go to Question 11.*
 - 4.4% 75 – 99%
 - 0.0% 50 – 74%
 - 15.4% 25 – 49%
 - 53.9% 1 – 24%
 - 15.4% 0%

4. **How many employees does your transit agency currently have? (Please enter number in space below.) N=79**

Number of Employees: **1651 (avg.)**

5. **How does the current number of employees compare to the number of employees five years ago? (Please check one.) N=80**
 - 32.5% More than 15% additional employees now
 - 51.3% Between 1% and 15% additional employees now
 - 6.3% No change in number of employees in the last five years
 - 8.8% Between 1% and 15% fewer employees now
 - 1.3% More than 15% fewer employees now

6. **During the past five years, did your transit agency eliminate or restructure any positions? (Please check one.) N=81**
 - 32.1% No → *Go to Question 8.*
 - 68.0% Yes

7. **When your transit agency eliminated or restructured positions, what happened to the employees in those positions? (Please check all that apply.) N=55**
 - 88.5% Employees were retained and filled a new or vacant position.
 - 33.3% Employees were dismissed/laid off.
 - 50.0% Employees left or retired.
 - 6.3% Other *Please explain:*

8. **How many of your employees are represented by a union? (If none, enter 0, then go to Question 10.) N=54**

Number of Employees: **1578.6 (avg.)**

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9. How many unions and bargaining units represent your employees? *(Please enter number in space below.)*

Number of Unions: **3.1 (avg.) (N=75)**
Number of Bargaining Units: **3.7 (avg.) (N=72)**

10. Without Section 13(c), would your agency have to engage in collective bargaining with the union(s) representing your employees? *(Please check one.) N=81*

11.1% No
85.2% Yes
3.7% Uncertain

11. Is your current Section 13(c) capital arrangement based on the 1979 Warranty (referred to in DOL Guidelines at (215.3(b)(3)(ii))? *(Please check one.) N=83*

38.6% No
51.8% Yes
9.6% Not Applicable *Please Explain:*

12. Is your current Section 13(c) operating arrangement based on the 1975 Model Agreement (referred to in DOL Guidelines at (215.3(b)(3)(i))? *(Please check one.) N=83*

22.9% No
63.9% Yes
13.3% Not Applicable *Please Explain:*

13. Does your state or municipality have labor laws or regulations containing provisions similar to those of Section 13(c) that require labor protection arrangements as a condition for receiving state or municipal transit funds? *(Please check one.) N=88*

81.8% No
17.1% Yes
1.1% Not Applicable *Please Explain:*

14. During the period from 10/1/95 to 9/30/2000 has your transit agency had any Section 13(c) claims filed against it? *(Please check one.) N=91*

86.8% No → *Go to Question 18.*
13.2% Yes

15. How many claims were filed between 10/1/95 and 9/30/2000? *(Please enter number in space below.) N=12*

Number of Claims: **2.8 (avg.)**

16. Did any of these claims, filed between 10/1/95 and 9/30/2000, lead to a settlement, arbitration, or DOL decision? *(Please check one.) N=12*

33.3% No → *Go to Question 18*
66.7% Yes

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17. Please provide the following information about settlements, arbitrations, and/or DOL decisions concerning Section 13(c) claims that were filed between 10/1/95 and 9/30/2000. (If you need more spaces, please make a copy of this page and include with your completed questionnaire.) N=8

Date of Settlement, Arbitration, or DOL Decision (Please indicate how the claim was processed, and give date of final decision.)	Total Estimated Value of Section 13(c) Payments and Amount Paid to Date (Please enter number in space below. If none, enter 0.)	Type of Claim (Please check all that apply.)	Number of Individuals Affected (Please enter number in space below.)
4 Settlement 8 Arbitration 0 DOL Decision Mo.: _____ Yr.: _____	Total Value of Payments: \$ 148,872.17 (Avg.) Amount Paid to Date: \$ 109,705.50 (Avg.)	8 Adverse Effects 7 Dismissal 7 Displacement 0 Relocation 0 Change of Benefits 7 Other Please specify: _____	Number: 36.7 (Avg.)
<input type="checkbox"/> Settlement <input type="checkbox"/> Arbitration <input type="checkbox"/> DOL Decision Mo.: _____ Yr.: _____	Total Value of Payments: \$ _____ Amount Paid to Date: \$ _____	<input type="checkbox"/> Adverse Effects <input type="checkbox"/> Dismissal <input type="checkbox"/> Displacement <input type="checkbox"/> Relocation <input type="checkbox"/> Change of Benefits <input type="checkbox"/> Other Please specify: _____	Number: _____
<input type="checkbox"/> Settlement <input type="checkbox"/> Arbitration <input type="checkbox"/> DOL Decision Mo.: _____ Yr.: _____	Total Value of Payments: \$ _____ Amount Paid to Date: \$ _____	<input type="checkbox"/> Adverse Effects <input type="checkbox"/> Dismissal <input type="checkbox"/> Displacement <input type="checkbox"/> Relocation <input type="checkbox"/> Change of Benefits <input type="checkbox"/> Other Please specify: _____	Number: _____
<input type="checkbox"/> Settlement <input type="checkbox"/> Arbitration <input type="checkbox"/> DOL Decision Mo.: _____ Yr.: _____	Total Value of Payments: \$ _____ Amount Paid to Date: \$ _____	<input type="checkbox"/> Adverse Effects <input type="checkbox"/> Dismissal <input type="checkbox"/> Displacement <input type="checkbox"/> Relocation <input type="checkbox"/> Change of Benefits <input type="checkbox"/> Other Please specify: _____	Number: _____

Part II

Effects of Section 13(c) On Your Transit Agency
Between 10/1/95 and 9/30/2000

18. Which of the following best describes the effect of Section 13(c) on your agency's labor costs between 10/1/95 and 9/30/2000? (Please check one.) N=92

- 4.4% Section 13(c) has greatly increased labor costs.
- 27.2% Section 13(c) has somewhat increased labor costs.
- 68.5% Section 13(c) has not had any effect on labor costs.
- 0.0% Section 13(c) has somewhat decreased labor costs.
- 0.0% Section 13(c) has greatly decreased labor costs.

19. Which of the following best describes the effect of Section 13(c) on your agency's relations with labor unions between 10/1/95 and 9/30/2000? (Please check one.) N=92

- 2.2% Section 13(c) has made relations with labor unions much more amicable.
- 1.1% Section 13(c) has made relations with labor unions somewhat more amicable.
- 63.0% Section 13(c) has not had any effect on relations with labor unions.
- 29.4% Section 13(c) has made relations with labor unions somewhat more contentious.
- 4.4% Section 13(c) has made relations with labor unions much more contentious.

20. Which of the following best describes the effect of Section 13(c) on your agency's receipt of federal transit funds between 10/1/95 and 9/30/2000? (Please check one.) N=92

- 6.5% Section 13(c) has greatly delayed the receipt of federal transit funds.
- 50.0% Section 13(c) has somewhat delayed the receipt of federal transit funds.
- 42.4% Section 13(c) has not had any effect on the timing of the receipt of federal transit funds.
- 0.0% Section 13(c) has somewhat expedited the receipt of federal transit funds.
- 1.1% Section 13(c) has greatly expedited the receipt of federal transit funds.

21. Which of the following best describes the effect of Section 13(c) on your agency's adoption of new technologies between 10/1/95 and 9/30/2000? (Please check one.) N=92

- 0.0% Section 13(c) has greatly facilitated the adoption of new technologies.
- 0.0% Section 13(c) has somewhat facilitated the adoption of new technologies.
- 84.8% Section 13(c) has had no effect on the adoption of new technologies.
- 13.0% Section 13(c) has somewhat hindered the adoption of new technologies.
- 2.2% Section 13(c) has greatly hindered the adoption of new technologies.

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22. Which of the following best describes the effect of Section 13(c) on your agency's ability to contract out for fixed-route transportation or fixed-route transportation-related services between 10/1/95 and 9/30/2000? (Please check one.) N=71

- 0.0% Section 13(c) has made it much easier to contract out.
- 0.0% Section 13(c) has made it somewhat easier to contract out.
- 53.5% Section 13(c) has had no effect on our ability to contract out.
- 28.2% Section 13(c) has made it somewhat more difficult to contract out.
- 18.3% Section 13(c) has made it much more difficult to contract out.
- 0.0% Not Applicable

23. Which of the following best describes the effect of Section 13(c) on your agency's ability to contract out for paratransit services between 10/1/95 and 9/30/2000? (Please check one.) N=80

- 0.0% Section 13(c) has made it much easier to contract out.
- 0.0% Section 13(c) has made it somewhat easier to contract out.
- 69.6% Section 13(c) has had no effect on the ability to contract out.
- 10.9% Section 13(c) has made it somewhat more difficult to contract out.
- 6.5% Section 13(c) has made it much more difficult to contract out.
- 0.0% Not Applicable

24. Which of the following best describes the effect of Section 13(c) on your agency's ability to pass through federal funds to another agency or entity between 10/1/95 and 9/30/2000? (Please check one.) N=52

- 0.0% Section 13(c) has made it much easier to pass through funds.
- 0.0% Section 13(c) has made it somewhat easier to pass through funds.
- 65.4% Section 13(c) has had no effect on the ability to pass through funds.
- 19.2% Section 13(c) has made it somewhat more difficult to pass through funds.
- 15.4% Section 13(c) has made it much more difficult to pass through funds.
- 0.0% Not Applicable

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25. Did Section 13(c) influence your decisions to adopt or upgrade new technologies between 10/1/95 and 9/30/2000? (Please follow instructions below for each question.)

Technology	1. Did Your Transit Agency Consider Adopting or Upgrading This Technology Between 10/1/95 and 9/30/2000? (If you answered 'No' for a technology, then go on to the next technology without answering Questions 2 and 3 for that technology.)		2. Has Your Transit Agency Implemented or Upgraded This Technology or Do You Plan to Implement or Upgrade This Technology? (If you answered 'Yes' for a technology in Question 1, please check 'yes' or 'no' for that technology.)		3. Was Your Transit Agency's Final Decision Influenced by Section 13(c)? (If you answered 'Yes' for a technology in Question 1, please check 'yes' or 'no' for that technology.)	
	No	Yes	No	Yes	No	Yes
Automatic Passenger Counter	56.0% (N=91)	44.0% (N=91)	17.7% (N=51)	82.4% (N=51)	98.0% (N=51)	2.0% (N=51)
Electronic Fare Payment System	26.4% (N=91)	73.6% (N=91)	11.9% (N=67)	88.1% (N=67)	97.0% (N=67)	3.0% (N=67)
Computerized or Internet Traveler Information System	36.0% (N=89)	64.0% (N=89)	8.9% (N=56)	91.1% (N=56)	96.4% (N=55)	3.6% (N=55)
Computer Assisted Dispatching and Scheduling System	15.6% (N=90)	84.4% (N=90)	5.3% (N=75)	94.7% (N=75)	97.4% (N=76)	2.6% (N=76)
Global Positioning System (e.g., Automatic Vehicle Location System)	21.1% (N=90)	78.9% (N=90)	15.5% (N=71)	84.5% (N=71)	97.1% (N=70)	2.9% (N=70)
Automated Demand Response Dispatching (On-Board Equipment)	48.3% (N=89)	51.7% (N=89)	17.8% (N=45)	82.2% (N=45)	97.7% (N=44)	2.3% (N=44)
Articulated Buses	66.7% (N=90)	33.3% (N=90)	6.7% (N=30)	93.3% (N=30)	96.7% (N=30)	3.3% (N=30)
Advanced Technology Buses (e.g., Low Floor, Low Emission Buses)	22.0% (N=91)	78.0% (N=91)	7.1% (N=70)	92.9% (N=70)	98.6% (N=70)	1.4% (N=70)
Bus Rapid Transit System (e.g., Dedicated Lanes, Automatic Guidance System)	61.8% (N=89)	38.2% (N=89)	29.4% (N=34)	70.6% (N=34)	94.1% (N=34)	5.9% (N=34)
On Board Electronic Security Monitoring	27.0% (N=89)	73.0% (N=89)	13.9% (N=65)	86.2% (N=65)	93.8% (N=64)	6.3% (N=64)
Other (Please specify.)	0.0% (N=2)	100.0% (N=2)	0.0% (N=2)	100.0% (N=2)	100.0% (N=2)	0.0% (N=2)

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26. Did Section 13(c) influence your decisions to change or enhance any of the following areas of transit operations between 10/1/95 and 9/30/2000? (Please follow instructions below for each question.)

Transit Operations Area	1. Did Your Transit Agency Consider a Change or Enhancement in This Area Between 10/1/95 and 9/30/2000? (If you answered 'No' for a transit operations area, then go on to the next transit operations area without answering Questions 2 and 3 for that transit operations area.)		2. Has Your Transit Agency Made or Do You Plan to Make a Change or Enhancement in This Area? (If you answered 'Yes' for a transit operations area in Question 1, please check 'yes' or 'no' for that transit operations area.)		3. Was Your Transit Agency's Decision Influenced by Section 13(c)? (If you answered 'Yes' for a transit operations area in Question 1, please check 'yes' or 'no' for that transit operations area.)	
	No	Yes	No	Yes	No	Yes
Fare Collection Methods	34.4% (N=90)	65.6% (N=90)	5.1% (N=59)	94.9% (N=59)	94.9% (N=59)	5.1% (N=59)
Maintenance Programs	31.1% (N=90)	68.9% (N=90)	9.7% (N=62)	90.3% (N=62)	82.3% (N=62)	17.7% (N=62)
Routing and Scheduling	18.9% (N=90)	81.1% (N=90)	0.0% (N=73)	100.0% (N=73)	86.3% (N=73)	13.7% (N=73)
Expansion of Existing Services	13.2% (N=91)	86.8% (N=91)	3.8% (N=79)	96.2% (N=79)	79.8% (N=79)	20.3% (N=79)
Addition of New Services, for example, Light Rail	40.0% (N=90)	60.0% (N=90)	7.4% (N=54)	92.6% (N=54)	75.9% (N=54)	24.1% (N=54)
Elimination of Position(s) with Employee(s) Dismissed	71.4% (N=91)	28.6% (N=91)	28.0% (N=25)	72.0% (N=25)	64.0% (N=25)	36.0% (N=25)
Employee(s) Moved to Alternative Position(s)	48.4% (N=91)	51.7% (N=91)	8.7% (N=46)	91.3% (N=46)	82.2% (N=45)	17.8% (N=45)
Use of Part-Time Employees	35.9% (N=92)	64.1% (N=92)	24.1% (N=58)	75.9% (N=58)	81.0% (N=58)	19.0% (N=58)
General Personnel Policies	35.2% (N=91)	64.8% (N=91)	8.5% (N=59)	91.5% (N=59)	86.4% (N=59)	13.6% (N=59)
Other (Please specify.)	0.0% (N=0)	0.0% (N=0)	0.0% (N=0)	0.0% (N=0)	0.0% (N=0)	0.0% (N=0)

27. Please briefly describe any other actions or steps you decided to take or not to take because of Section 13(c). N=5

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28. Transit agencies must comply with a number of federal requirements and regulations. Each of these take some time, effort, and resources. Considering the time, effort, and resources required, please indicate how easy or difficult it has been for your agency to meet the following federal requirements between 10/1/95 and 9/30/2000. (For each requirement, please indicate the degree of difficulty by checking the appropriate box.)

Federal Requirement	Very Easy	Somewhat Easy	Neither Easy or Difficult	Somewhat Difficult	Very Difficult
Fulfilling <u>procurement requirements</u> , including justification for award to other-than-low-bidder (N=91)	4.4%	8.8%	28.6%	49.5%	8.8%
Complying with <u>Buy America Provisions</u> (N=92)	7.6%	9.8%	27.2%	53.3%	2.2%
Justifying the <u>lease versus purchase of transit capital assets</u> (N=87)	4.6%	9.2%	63.2%	18.4%	4.6%
Complying with <u>ADA requirements</u> (N=92)	3.3%	4.4%	13.0%	47.8%	31.5%
Complying with <u>Disadvantaged Business Enterprise Program (DBE) requirements</u> (N=91)	2.2%	2.2%	22.0%	63.7%	9.9%
Complying with <u>environmental protection requirements</u> (N=92)	4.4%	5.4%	32.6%	44.6%	13.4%
Fulfilling the <u>Clean Air Act</u> conformity requirements (N=91)	7.7%	6.6%	44.0%	30.8%	11.0%
Complying with <u>drug and alcohol testing procedures</u> specified in FTA regulations (N=92)	5.4%	6.5%	28.3%	45.7%	14.1%
Complying with <u>Davis-Bacon prevailing wage requirements</u> for transit construction projects (N=91)	8.8%	13.2%	52.8%	22.0%	3.3%
Fulfilling <u>transit labor (Section 13 (c)) requirements</u> (N=91)	9.9%	4.4%	56.0%	23.1%	6.6%
Other (Please specify.) (N=2)	0.0%	0.0%	0.0%	0.0%	100.0%

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Part III

**Assistance Provided by the Department of Labor
And the Department of Transportation's Federal Transit Administration**

29. Listed below are a number of actions that DOL or FTA could undertake to help transit agencies with Section 13(c). How useful would each of these actions be to your transit agency? (For each action, put a check in the box that best indicates the degree to which the action would be useful to your transit agency.)

Action	Definitely Useful	Probably Useful	Uncertain	Probably Not Useful	Definitely Not Useful
Provide information on best practices of transit agencies (N=91)	40.7%	41.8%	14.3%	2.2%	1.1%
Provide funding for research on transit labor relations (N=91)	30.8%	23.1%	28.6%	14.3%	3.3%
Provide information about Section 13(c) on FTA and DOL web sites (N=91)	42.9%	37.4%	13.2%	4.4%	2.2%
Increase the guidance from FTA (N=91)	36.3%	34.1%	15.4%	12.1%	2.2%
Increase the guidance from DOL (N=91)	30.8%	36.3%	13.2%	13.2%	6.6%
Provide reasons for FTA delay in processing an application (N=91)	56.0%	29.7%	8.8%	3.3%	2.2%
Provide information on DOL delay in certifying labor protection arrangements (N=91)	53.9%	30.8%	11.0%	2.2%	2.2%
Publish DOL certification letters (N=91)	33.0%	34.1%	24.2%	6.6%	2.2%
Provide additional factual and legal explanations for DOL certification decisions (N=90)	47.8%	34.4%	14.4%	2.2%	1.1%
Other (Please specify) (N=4)	100.0%	0.0%	0.0%	0.0%	0.0%

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30. How satisfied are you with the timeliness of FTA's processing of grant applications that require Section 13(c) certification? N=91

17.6% Very Satisfied
30.8% Somewhat Satisfied
27.5% Neither Satisfied nor Dissatisfied
19.8% Somewhat Dissatisfied
4.4% Very Dissatisfied

31. How satisfied are you with the timeliness of DOL's certification of labor protection arrangements? N=90

14.4% Very Satisfied
27.8% Somewhat Satisfied
28.9% Neither Satisfied nor Dissatisfied
14.4% Somewhat Dissatisfied
14.4% Very Dissatisfied

32. Please briefly describe any changes that DOL or FTA could make to help transit agencies with Section 13(c) requirements.

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Information About Individual(s) Completing Questionnaire

Please provide the following information on all individuals who completed or helped to complete this questionnaire. (Attach additional sheets if necessary.)

Name: _____

Title: _____

Phone: _____

E-mail: _____

Name: _____

Title: _____

Phone: _____

E-mail: _____

Name: _____

Title: _____

Phone: _____

E-mail: _____

Thank you very much for taking the time to complete this questionnaire. If you would like to make additional comments concerning any topic covered in this questionnaire, please feel free to use this page or to attach additional pages.

GAO Contacts and Staff Acknowledgments

GAO Contacts

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Acknowledgments

In addition to those named above, the following staff members made key contributions to this report: Casey Brown, Helen Desaulniers, Curtis Groves, Lynn Musser, and Yvonne Pufahl.

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