



**CITY OF ALBUQUERQUE
TRANSIT DEPARTMENT**

**REVISED
AMERICANS WITH DISABILITIES ACT FIXED-ROUTE BUS STOP
ANNOUNCEMENT POLICY - 2012**

July 30, 2012

BACKGROUND INFORMATION

**AMERICANS WITH DISABILITIES ACT – REQUIREMENTS FOR FIXED-ROUTE
BUS STOP ANNOUNCEMENTS**

The Americans with Disabilities Act (ADA) of 1990 requires public transit agencies to provide on-board bus stop and bus stop transfer information. The specific requirements for stop announcements and route identification are set forth in 49 CFR 37.167. The required fixed-route bus stop announcements are:

1. Stops associated with major intersections,
2. Stops associated with major destination points,
3. Stops associated with transfer points to other fixed-routes,
4. Any stop when requested by an individual with a disability,
5. At sufficient intervals along a route to permit individuals with visual disabilities to be oriented to their location, and
6. Where vehicles or other conveyances serve the same stop, the transit agency shall provide a means by which an individual with a visual impairment or other disability can identify the proper vehicle to enter or be identified to the vehicle operator as a person seeking to ride on a particular route.

**TRANSIT DEPARTMENT FIXED-ROUTE BUS STOP ANNOUNCEMENTS –
SUMMARY OF POLICY AND PRACTICE**

In August 1994, before on-board announcement systems were on buses and when motor coach operators (bus drivers) had to make verbal announcements during their entire work shift, the Transit Department issued a bus stop announcement policy to the

motor coach operators. This policy, while reiterating the ADA bus stop announcement requirements, did not define “major intersections”, “major destinations” or “sufficient intervals”. The failure to define these locations led to inconsistencies in the announcements that were made by motor coach operators.

In 2003 the Transit Department ordered new buses that included automated, on-board bus stop announcement systems. Transit Department staff met with staff from the New Mexico Commission for the Blind to discuss concerns with how bus stop locations were being announced and how the new on-board announcement system could be programmed to address the needs of the visually impaired community. The informal agreement (there was no written agreement with the New Mexico Commission for the Blind nor did the Transit Department revise its 1994 bus stop announcement policy) was that the on-board announcement system would be programmed to announce every traffic controlled intersection: “traffic controlled” was defined as every intersection that was controlled by a traffic light or a stop sign.

In 2004 the new buses were placed into operation. With each subsequent fixed-route bus purchase the Transit Department has included an on-board announcement system as a component of the bus purchase package. The on-board announcement system is programmed to announce controlled intersections.

There is a subtle but significant difference between the Transit Department's 1994 bus stop announcement policy and the announcement practice that was implemented in 2004. The 1994 policy correctly states the ADA requirement of announcing bus stops. The announcement practice that was implemented in 2004 focused on controlled intersections, not bus stops. The current practice does allow individuals to use the on-board announcement system to identify bus stops at some controlled intersections but not at all controlled intersections.

ESTIMATING HOW FAR IN ADVANCE OF THE REQUIRED BUS STOP LOCATION TO TRIGGER THE BUS STOP ANNOUNCEMENT

The ADA directive is to announce required bus stops in sufficient time so that when an individual hears an announcement for their desired bus stop, he or she can pull/push the “stop request” cord/button, the “stop request” bell and words are then sounded and displayed, and then the motor coach operator responds to this request by pulling safely over to the bus stop. The number of seconds it takes to announce the upcoming bus stop, the estimated passenger/motor coach operator reaction time, the estimated speed of the bus, and the accuracy (approximately 66 feet) of the signals from global positioning system (GPS) satellites determines the location at which the bus stop announcement begins.

Given these factors the distance of the bus stop announcement “trigger point” from the bus stop location will vary. Estimated bus speed is the factor that varies the most.

COMPLAINTS TO THE FEDERAL TRANSIT ADMINISTRATION REGARDING THE TRANSIT DEPARTMENT'S ON-BOARD FIXED-ROUTE ANNOUNCEMENTS AND FEDERAL TRANSIT ADMINISTRATION FINDINGS

In March 2011, the Federal Transit Administration (FTA) received a complaint against the Transit Department. The complaint alleged that the Department is failing to make stop announcements for riders with visual impairments, as required by the ADA. The complaint stated that the automated announcement systems on-board ABQ Ride buses are out of sync with actual stop locations.

In June 2011 a similar complaint was filed with the FTA. This complaint also stated that automated stop announcements on ABQ Ride buses were frequently silent.

The FTA requested bus stop announcement information from the Transit Department, which was provided and analyzed by FTA staff. In January 2012 FTA staff came to Albuquerque (not announced to the Transit Department) to observe and evaluate the performance of ABQ Ride stop announcement and route identification efforts.

The FTA findings were as follows:

1. FTA staff observed that the annunciators had been programmed to announce upcoming intersections. However, announcements were consistently made too late for riders to get off at the announced intersection's corresponding bus stop; announcements were judged to be late 30.58% of the time.
2. FTA staff observed a "no-call" rate of 11.5%. This was because some motor coach operators were not making verbal bus stop announcements when the on-board announcement system was not working; either the equipment was not working or the equipment had not been turned-on or the equipment had been turned-off.
3. FTA staff observed that ABQ Ride did not include announcements for transfer points with other fixed-routes.

The FTA conclusions were as follows:

1. ABQ Ride must provide timely notice to riders of the bus stop correlating to the announced intersection. The announcement system does not always provide riders with sufficient time to alert the motor coach operator of the rider's need to alight at a specific stop.
2. ABQ Ride must also announce transfer points with other fixed-routes and must ensure that the drivers are trained to proficiency on their responsibilities to make these announcements both when the annunciator is not working and when required to do so by riders with disabilities.

BUS STOP ANNOUNCEMENT POLICY ACTIONS UNDERTAKEN BY THE TRANSIT DEPARTMENT

In response to the FTA's findings and conclusions, the Transit Department issued a draft "Americans With Disabilities Act Fixed-Route Announcement Policy" on June 6, 2012. The purpose of this draft policy was to bring the Transit Department into compliance with the ADA fixed-route bus stop announcement requirements by:

1. Better defining bus stop locations that are required to be announced, and
2. To have a policy that will be used by Transit Department staff to program the on-board announcement system for bus stop announcements and that will be used by motor coach operators to make bus stop announcements when the on-board announcement system is not working.

Notice of the draft policy was placed in buses; a notice and copy of the draft policy was placed on Transit's Web site and were sent to visually impaired and disability advocacy groups, and to the New Mexico Commission for the Blind. A public meeting, announced on Transit's Web site and in the local newspaper, regarding the draft policy was held on June 23, 2010. Individuals were able to provide comments during this meeting. Individuals were also able to submit comments by regular mail or to an e-mail address.

A telephone conference call was conducted on July 17, 2012 with staff from the FTA, New Mexico Commission for the Blind, and the Transit Department to discuss the ADA requirements for bus stop announcements, FTA's findings concerning the Transit Department's current bus stop announcement practice, and possible changes to this practice.

PUBLIC COMMENTS RECEIVED AND THE TRANSIT DEPARTMENT'S RESPONSES TO THESE COMMENTS

The Transit Department has grouped similar comments together and the responses to these comments are provided below.

Retain the Current Policy of Announcing All Controlled Intersections

The ADA requires that bus stops associated with major intersections be announced. The Transit Department's practice of focusing on the announcing of controlled intersections and not on the bus stops associated with these intersection has been determined by the FTA to be in non-compliance with the ADA regulations.

The Global Positioning System Coordinates Need To Be Adjusted - The Current Policy Doesn't Need To Be Changed

Currently, the Transit Department is using GPS signals to locate trigger points for announcements of approaching intersections, not approaching bus stops. The Department must reprogram its announcement system to focus on bus stops.

Announce All Controlled Intersections Regardless of Whether There Is An Associated Bus Stop

The Transit Department wants to provide in-vehicle location information that is usable to the visually impaired community. The Department will strive to provide this information while having a bus stop announcement system that meets ADA requirements.

The Current Announcement System is Familiar to Many Blind and Visually Impaired Residents of Albuquerque and Making Changes Could be Confusing to These Residents

The Transit Department is required to come into conformity with ADA fixed-route bus stop announcement requirements. Before any changes go into effect, the department will design and implement an informational campaign that will explain the changes.

Not All Bus Stops Have An Accessible Sidewalk or Built Public Infrastructure and Not Announcing Nearby Controlled Intersections May Result in Dangerous Situations

The Transit Department believes that concise announcements provide useful information for transit passengers.

Bus Drivers Must Make Announcements When the Announcement System Fails

The Transit Department agrees.

The On-Board Announcement System Should be Programmed So That Drivers Cannot Turn-Off the System

The Transit Department is looking for such an “off-the-shelf” announcement system.

What Are The Announcement Policies at Other Transit Agencies

All transit agencies must meet the same ADA bus stop announcement requirements. Communities have flexibility in how terms, such as “major intersections” or “major destinations” are defined.

Will Some Bus Stops Be Eliminated

It is likely that some bus stops may need to be eliminated to prevent confusion as to where the bus is stopping. Specifically, those bus stops between the location of the bus stop announcement trigger point and the location of the announced bus stop.

Announcing Controlled Intersections That Have No Bus Stops Is Confusing

The Transit Department is required to meet all ADA fixed-route bus stop announcement requirements. While meeting these requirements it will consider the announcement desires of all transit riders.

Where There Are Streets On Which More Than One Route Operates Will Each Route Have a Different Announcement

Different routes that operate on the same street may have difference announcements depending on the type of service provide: commuter, local or rapid.

When the “Stop Request” is Displayed Have the Date/Time Show-Up At Least Once Every 30 Seconds

The Transit Department will take this suggestion under consideration.

How Is Reasonable Amount Of Time To Hear and React To The Bus Stop Announcement Defined

The Transit Department defines this amount of time as three (3) seconds from the end of the announcement.

What Is A Limited Access Facility

Limited access facilities are highways/roads that have controlled points of access, such as, Interstate 25 and Paseo Del Norte.

How Is The Trigger Box Length Determined

Please see above “Estimating How Far In Advance Of The Required Bus Stop Location To Trigger The Bus Stop Announcement”.

It Is Beneficial For People With A Variety of Disabilities To Have More Rather Than Less Bus Stops

The Transit Department seeks to balance the requests for additional bus stops with the potential for additional ridership and the necessity of maintaining a reasonable time schedule.



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**PURPOSE OF THE TRANSIT DEPARTMENT FIXED-ROUTE BUS STOP
ANNOUNCEMENT POLICY**

The purpose of the Transit department’s revised fixed-route bus stop announcement policy is to meet the requirements of the ADA fixed-route, bus stop announcement

regulations by better defining bus stop locations and to provide information to the public regarding how the Transit department intends to fulfill its ADA responsibilities. The Department's policy provides information needed by: Transit employees who are responsible for programming the on-board bus stop announcement system, motor coach operators who are responsible for making verbal bus stop announcements, if the automated bus stop announcement system fails, and by employees who are responsible for ensuring compliance with the ADA regulations.

DEFINITIONS

As used in this policy:

Americans with Disabilities Act (ADA) means the federal law that requires specific types of bus stop announcements on fixed-route buses.

Announcement ending location means the geographical position where the bus stop announcement ends. This ending location will be before the location of the stop or the destination being announced.

Announcement trigger point means the global positioning system location used to trigger the start of the bus stop announcement.

Cross-street means a street that intersects with another street.

Far side bus stop means a bus stop, given the direction of travel of the bus, which is located after the bus travels through an intersection.

Fixed-route means a transit agency's regularly scheduled bus service that operates along a prescribed route according to a prescribed time schedule.

Global positioning system (GPS) means the space-based, satellite navigation system that provides location and time information in all weather, anywhere on or near the Earth, where there is an unobstructed line of sight to the GPS satellites. This system is accurate within 66 feet of a specific location.

Major destination point means a specific geographical area, or a specific building or buildings, which are located within one-quarter of a mile of a transit route and are of interest to a significant portion of transit riders. The Transit Department will maintain a list of major destinations and their respective geographical areas or geographical locations. Examples of major destinations include: major educational institutions, major hospitals, transit centers, major governmental offices.

Major intersection means a signalized intersection where either a) two urban principal arterials intersect, or b) where two urban minor arterials intersect, or c) where an urban principal arterial intersects with an urban minor arterial, and there is a bus stop associated with this intersection. The Mid-Region Council of Governments' "Street Classification Report" is used to identify "urban principal arterials" and "urban minor arterials".

Near-side bus stop means a bus stop, given the direction of travel of the bus, which is located before the bus travels through an intersection.

Requested stop announcement means any bus stop that a passenger requests the driver to announce, even if it does not meet any of the other announcement criteria.

Transit Center refers to an off-street or a combined off-street / on-street facility where passengers board and alight from bus or rail vehicles. Transit centers may include all or some of the following attributes: multiple bus transit or rail transit routes, signage, lighting, canopies, wind shelters, and on-site non-transit vehicle and/or bicycle parking.

Transfer points with other fixed-routes means a location where an individual can change from one route to another to continue their trip.

Trigger box length means the estimated distance, in feet, traveled by the bus from the bus stop announcement trigger point to the bus stop announcement ending location so that there is a reasonable amount of time for a passenger to hear the announcement, and if the passenger wants to get off the bus, to pull the stop request cord or push the stop request tape, and for the motor coach operator to hear the stop request announcement or see the stop request light, and to safely stop at the bus stop.

PROCEDURES FOR ESTABLISHING ADA FIXED-ROUTE BUS STOP ANNOUNCEMENT TRIGGER POINTS

Major Intersections

The announcement trigger point for a major intersection is established based on the location of the bus stop associated with this intersection and the associated trigger box length.

Major Destinations

The announcement trigger point for a major destination is established based on the geographical boundary or geographical location of the major destination and the associated trigger box length.

Transfer Points With Other Fixed-Routes

Transfer information will be announced in the following manner:

1. **Transit Center Information**

The on-board announcement system will name the transit center that the bus is approaching and state that this transit center is a transfer location.

The announcement trigger point will be located after the last bus stop prior to the transit center location.

2. **Cross-Street Fixed-Route Service**

The on-board announcement system will provide cross-street route information, if there is a bus stop associated with the cross-street and the street on which the bus is operating.

The trigger box length for this announcement will be:

- a. For cross-street intersections where the near-side bus stop is the same distance or less distance to the intersection than the far-side bus stop, the trigger box length will be from the next-to-the-last bus stop prior to the cross-street intersection and before the first bus stop before the cross-street intersection.
 - b. For cross-street intersections where the far-side bus stop is significantly less distance to the intersection than the near-side bus stop, the trigger box length will be from the near-side bus stop to the cross-street intersection.
3. **On-Street Bus Stops that Serve Multiple Routes**
Where multiple routes serve some of the same bus stops while traveling on the same street, transfer announcements will be made where the routes first come together, first potential transfer location, and at the last stop before the routes diverge, last potential transfer location. The transfer points will not be announced, if all routes serve all bus stops.

At Sufficient Intervals Along A Route To Permit Individuals With Visual Disabilities To Be Oriented To Their Location

Geographical location announcements will be made a minimum of one announcement every mile, except where a route has no stops because it is operating on a limited access facility, the announcements will be made at three mile intervals and when entering and exiting the limited access facility.

STOP REQUESTS BY INDIVIDUALS

Motor coach operators are required to honor all requests from passengers to announce a bus stop. If a passenger will be asking a motor coach operator to announce a stop, the passenger is not required to make this request upon boarding the bus. The passenger must, however, give the motor coach operator sufficient advanced notice so that the motor coach operator is able to announce and to safely stop at the requested bus stop.

POSSIBLE REMOVAL OR RELOCATION OF BUS STOPS IN ORDER TO PREVENT PASSENGER DISORIENTATION

Bus stops located within the trigger box length for a required ADA bus stop announcement will be relocated or removed to prevent passengers from being disoriented, as may occur in the following scenario: The bus passes an announcement trigger point and the announcement system makes the required ADA "approaching bus stop" announcement. If a passenger then pulls the "Stop Request" cord for a bus stop located before the announced ADA bus stop location, passengers who want to get off at the ADA bus stop location may be confused when the motor coach operator stops at the "Stop Request" location.

BUS STOP CURB SIDE ANNOUNCEMENT

When the front door of the bus is opened the on-board announcement system will announce the route number and the destination that the bus is serving. This information will be announced from the bus' curb side, external speakers.