



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION V
Illinois, Indiana, Michigan,
Minnesota, Ohio,
Wisconsin

200 West Adams Street
Suite 320
Chicago, IL 60606
312-353-2789
312-886-0351 (FAX)

August 26, 2015

Mr. Chris Abele
Milwaukee County Executive
Milwaukee County Courthouse
901 N. 9th Street, Room 306
Milwaukee, WI 53233

Dear Mr. Abele:

The enclosed final report documents the Federal Transit Administration's (FTA) Triennial Review of the Milwaukee County Transit System (MCTS). This review is required by Chapter 53 of Title 49, United States Code, Section 5307. Although not an audit, the Triennial Review is the FTA's assessment of MCTS's compliance with federal requirements, determined by examining a sample of grant management and program implementation practices. As such, the Triennial Review is not intended as, nor does it constitute, a comprehensive and final review of compliance with grant requirements.

The Triennial Review focused on the County's compliance in 17 areas. No deficiencies were found with the FTA requirements in 12 areas. Deficiencies were found in five areas: Procurement, Legal, Satisfactory Continuing Control, Drug-Free Workplace/Drug and Alcohol Program, and EEO. There were no repeat deficiencies from the FY2012 Triennial Review. Following the site visit MCTS provided satisfactory responses to the corrective actions in the Procurement, Legal, and Satisfactory Continuing Control areas. These corrective actions have been closed.

Please send the remaining corrective actions before the due date specified in this Final Report to Mr. Jay Ciavarella, Director, Office of Program Management & Oversight at Jason.Ciavarella@dot.gov. If MCTS requires additional time to complete the corrective action, please contact Mr. Ciavarella via email before the due date and request a time extension along with a written justification for review by FTA. If we do not receive a response by the due date, it will be considered late. Non-responses may jeopardize your agency's ability to receive future federal funding. Please notify our office if there are any extenuating circumstances for our consideration.

Thank you for your cooperation and assistance during this Triennial Review. If you need any technical assistance or have any questions, please do not hesitate to contact Ms. Lisa Joiner at (312) 353-2791 or by email at Lisa.Joiner@dot.gov.

Sincerely,

Marisol R. Simón
Regional Administrator

FINAL REPORT

FY 2015 TRIENNIAL REVIEW

of the

**Milwaukee County Transit System
(MCTS)
Recipient ID: 1260**

Performed for:

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION
REGION 5**

Prepared by:

**Pierlott & Associates, LLC
(under subcontract to Interactive Elements, Inc.)**

**Scoping Meeting Date: January 29, 2015
Site Visit Dates: June 23-24, 2015
Final Report Date: August 26, 2015**

Table of Contents

I. Executive Summary	1
II. Review Background and Process	2
1. Background.....	2
2. Process	2
3. Metrics	2
III. Grantee Description.....	3
IV. Results of the Review	5
1. Financial Management and Capacity.....	5
2. Technical Capacity	5
3. Maintenance.....	5
4. Americans with Disabilities Act	5
5. Title VI.....	6
6. Procurement.....	6
7. Disadvantaged Business Enterprise.....	6
8. Legal	7
9. Satisfactory Continuing Control	7
10. Planning/Program of Projects	7
11. Public Comment on Fare Increases and Major Service Reductions.....	8
12. Half Fare.....	8
13. Charter Bus.....	8
14. School Bus.....	8
15. Security	8
16. Drug Free Workplace and Drug and Alcohol Program	9
17. Equal Employment Opportunity	9
V. Summary of Findings	10
VI. Attendees	12
VII. Appendices	13

I. Executive Summary

This report documents the Federal Transit Administration’s (FTA) Triennial Review of the Milwaukee County Transit System (MCTS). The review was performed by the Interactive Elements, Inc. team. During the site visit, administrative and statutory requirements were discussed and documents were reviewed. The MCTS’ transit facilities were toured to provide an overview of activities related to FTA-funded projects.

The Triennial Review focused on the MCTS’ compliance in 17 areas. Deficiencies were found in the areas listed below.

Review Area	Deficiency Code	Deficiency Description
6. Procurement	D-183	No verification that excluded parties are not participating
8. Legal	D-65	Officials do not have requisite authority
9. Satisfactory Continuing Control	D-84	Lacking excess real property utilization inventory/plan out of date
16. Drug-Free Workplace/ Drug and Alcohol Program	D-14	No drug and alcohol testing program
17. EEO	D-144	Failure to obtain EEO plans from subrecipients/contractors exceeding threshold

II. Review Background and Process

1. Background

The United States Code, Chapter 53 of Title 49, requires the FTA of the United States Department of Transportation (USDOT) to perform reviews and evaluations of Urbanized Area Formula Grant activities at least every three years. This requirement is contained in 49 U.S.C. 5307(f)(2). This review was performed in accordance with FTA procedures (published in FTA Order 9010.1B, April 5, 1993). At least once every three years, the Secretary shall review and evaluate completely the performance of a grantee in carrying out its program, specifically referring to compliance with statutory and administrative requirements.

The Triennial Review includes a review of the grantee's compliance in 17 areas. The basic requirements for each of these areas are summarized in Section IV.

This report presents the findings from the Triennial Review of the Milwaukee County Transit System (MCTS). The review concentrated on procedures and practices employed during the past three years; however, coverage was extended to earlier periods as needed to assess the policies in place and the management of grants. The specific documents reviewed are referenced in this report and are available at FTA's regional office or at the grantee's office.

Process

The Triennial Review process includes a pre-review assessment, a review scoping meeting with the FTA regional office, and an on-site visit to the grantee's location. The review scoping meeting was conducted with the Region 5 Office on January 29, 2015. Necessary files retained by the regional office were sent to the reviewer electronically. A grantee information request and review package was sent to the MCTS advising it of the site visit and indicating information that would be needed and issues that would be discussed. The site visit to Milwaukee occurred on June 23 and 24, 2015.

The onsite portion of the review began with an entrance conference, at which the purpose of the Triennial Review and the review process were discussed. The remaining time was spent discussing administrative and statutory requirements and reviewing documents. MCTS' FTA-funded transit facilities were toured. Upon completion of the review, a summary of preliminary findings was provided to MCTS at an exit conference. The individuals participating in the review are listed in Section VI of this report.

2. Metrics

The metrics used to evaluate whether a grantee is meeting the requirements for each of the areas reviewed are:

- *Not Deficient*: An area is considered not deficient if, during the review, no findings were noted with the grantee's implementation of the requirements.
- *Deficient*: An area is considered deficient if any of the requirements within the area reviewed were not met.

- *Not Applicable:* An area can be deemed not applicable if, after an initial assessment, the grantee does not conduct activities for which the requirements of the respective area would be applicable.

III. Grantee Description

Organization

The Milwaukee County Department of Transportation (MCDOT) provides public transit services through the Milwaukee County Transit System (MCTS). Prior to January 1, 2015, MCDOT contracted with Milwaukee Transport Services, Inc. (MTS), a private not-for-profit corporation, for direct management and operation of the transit system. As of January 1, 2015, MTS became a quasi-governmental instrumentality of Milwaukee County responsible for the management and operation of MCTS. MTS functions as a division within the County government.

Services

MCTS serves all of Milwaukee County with contractual arrangements for limited services in adjacent Ozaukee and Waukesha Counties. The population of its service area is approximately 956,023.

MCTS operates a network of 62 fixed routes. Service is provided daily from 4:00am – 2:30am. The fixed route service includes local routes, freeway flyer (express) services, and seasonal services. Transit Plus, the grantee's paratransit service, operates during the same days and hours as the fixed route service. There are three paratransit operating contractors: Transit Express, Inc., First Transit, Inc., and American United Taxicab. Only Transit Express, Inc. and First Transit, Inc. provide ADA complementary paratransit services, while all three contractors provide non-ADA services.

The basic adult fare for bus service is \$2.25. A reduced fare of \$1.10 is offered to children under age 12, senior citizens, persons with disabilities, and Medicare card holders during all hours of service. There is a premium of \$1.00 added for Freeway Flyer fares and UBUS Flyers. Waukesha County riders pay an additional \$0.35 zone fare, and Ozaukee Express Bus riders pay \$3.50 or \$1.60 if eligible for the half-fare program. The County offers a variety of discounted pass and multi-ride ticket programs. The fare on the Transit Plus paratransit service is \$3.50 per trip.

MCTS operates a fleet of 397 buses for fixed-route service. Its bus fleet consists of standard 40-foot transit coaches. The current peak requirement is for 332 vehicles. The Transit Plus contractors provide the vans and taxi vehicles used for paratransit service.

MCTS facilities include three bus garages (Fond du Lac, Fiebrantz, and Kinnickinnic), a heavy maintenance facility on Vine Street, and the MCTS Administration Building on North 17th Street. Its service is oriented around the Downtown Transit Center on Michigan Avenue in downtown Milwaukee.

Grant Activity

Below is a list of MCTS's open grants at the time of the review.

Grant Number	Grant Amount	Year Executed	Description
WI040064	\$3,240,000	2013	State of Good Repair
WI-34-0003	\$1,961,660	2014	FY13 5339 Bus Replacements
WI-34-0009	\$1,941,849	2014	FY14 5339 Bus Replacements
WI-90-X745	\$15,882,000	2013	MCTS FY13 Formula Grant
WI-90-X753	\$435,075	2013	FY2011 5307 LAPSING FUNDS
WI-90-X766	\$15,008,548	2014	MCTS FY13/FY14 Capital
WI-90-X773	\$440,132	2014	FY2012 5317 New Freedom
WI-95-X027	\$1,510,000	2012	Sec 5307 FY 2011 CMAQ
WI-95-X038	\$6,349,980	2013	MCTS Express Bus Service
WI-96-X012	\$25,682,975	2009	45 -40' Replacement Diesel Buses

Completed Projects

MCTS has completed the following projects over the past three years:

- Purchased 145 replacement buses over the last 3 years
- Installed underground fuel storage tanks (USTs) at Fleet Maintenance

Projects Underway

The following projects are currently underway.

- Installing new bus vacuum, bus washer and HVAC systems at Kinnickinnic
- Installing new bus vacuum and bus washer systems at Fiebrantz
- Installing bus washer and fire alarm systems in Fond du Lac as well as façade repairs
- Installing driver shields on all MCTS buses
- Completing replacement of fareboxes and annunciators on all MCTS buses

Future Projects

Over the next three to five years, MCTS will carry forward the following projects.

- Replacement of video systems on all MCTS buses
- Continued bus replacements and routine building maintenance

ARRA Projects

The following projects are ARRA-funded projects that are either completed or underway

- 3 computers (completed)
- 45 replacement buses (completed)
- Replacement fareboxes (underway)
- Vehicle annunciators (underway)

IV. Results of the Review

1. Financial Management and Capacity

Basic Requirement: The grantee must demonstrate the ability to match and manage FTA grant funds, cover cost increases and operating deficits, cover maintenance and operational costs for FTA funded facilities and equipment, and conduct and respond to applicable audits.

Finding: During this Triennial Review of MCTS, no deficiencies were found with the FTA requirements for Financial Management and Capacity.

2. Technical Capacity

Basic Requirement: The grantee must be able to implement FTA funded projects in accordance with the grant application, Master Agreement, and all applicable laws and regulations, using sound management practices.

Finding: During this Triennial Review of MCTS, no deficiencies were found with the FTA requirements for Technical Capacity.

3. Maintenance

Basic Requirement: Grantees and subrecipients must keep federally funded vehicles, equipment and facilities in good operating condition. Grantees and subrecipients must keep ADA accessibility features on all vehicles, equipment and facilities in good operating order.

Finding: During this Triennial Review of MCTS, no deficiencies were found with the FTA requirements for Maintenance.

4. Americans with Disabilities Act

Basic Requirement: Titles II and III of the Americans with Disabilities Act of 1990 (ADA) provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service, including complementary paratransit service.

Finding: During this Triennial Review of MCTS, no deficiencies were found with the USDOT requirements for ADA.

5. Title VI

Basic Requirement: The grantee must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance without regard to whether specific projects or services are federally funded. The grantee must ensure that federally supported transit services and related benefits are distributed in an equitable manner.

Note: The 2015 triennial review covers a three-year period in which the FTA issued a revised circular for Title VI, which provided more information on how to comply and changed requirements for some grantees with populations over 200,000. FTA Circular 4702.1B became effective October 1, 2012. Title VI programs submitted to FTA after this date must comply with the requirements of this circular. The triennial review will look at compliance with the requirement of FTA Circular 4702.1A for the period prior to October 1, 2012, and compliance with the revised circular for activities after this date.

Finding: During this Triennial Review of MCTS, no deficiencies were found with the FTA requirements for Title VI.

6. Procurement

Basic Requirement: Grantees use their own procurement procedures that reflect applicable state and local laws and regulations, provided that the process ensures competitive procurement and the procedures conform to applicable federal law, including 49 CFR Part 18 (specifically Section 18.36) and FTA Circular 4220.1F, “Third Party Contracting Guidance.”

Finding: During this Triennial Review of MCTS, a deficiency was found with the FTA requirements for Procurement. During the examination of procurement files it was found that the two construction projects administered by the County’s Architecture, Engineering and Environmental Service Section did not have documentation demonstrating that the System for Award Management (SAM) was checked prior to award to ensure that no excluded parties were participating in either contract.

Corrective Action and Schedule: Following the site visit the County submitted to the FTA Region 5 Office revised procurement procedures that describe how the County will ensure that procurements conducted by the Architecture, Engineering and Environmental Service Section will include verifications of excluded parties in the System for Award Management (SAM) for all applicable FTA-assisted third-party procurements in the future. This corrective action has been closed.

7. Disadvantaged Business Enterprise

Basic Requirement: The grantee must comply with 49 CFR Part 26 to ensure nondiscrimination in the award and administration of DOT-assisted contracts. Grantees also must create a level playing field on which DBEs can compete fairly for DOT-assisted contracts.

Finding: During this Triennial Review of MCTS, no deficiencies were found with the USDOT requirements for DBE.

8. Legal

Basic Requirement: The grantee must be eligible and authorized under state and local law to request, receive, and dispense FTA funds and to execute and administer FTA funded projects. The authority to take actions and responsibility on behalf of the grantee must be properly delegated and executed. Grantees must comply with Restrictions on Lobbying requirements.

Finding: During this Triennial Review of MCTS, a deficiency was found with the FTA requirements for Legal. Although the authorized official and the attorney sign hard copies of the Annual Certifications and Assurances and the responsibility to PIN the Certifications and Assurances has been properly delegated, the PINs for the authorized official and the attorney are being used by the Senior Manager of Grants Compliance and the Grants Development Manager, respectively. The Senior Manager of Grants Compliance and the Grants Development Manager do not currently have their own PINs.

Corrective Action and Schedule: Following the site visit the County submitted to the FTA Region 5 Office procedures that describe how persons who PIN the Annual Certifications and Assurance in TEAM-Web have proper authority and PINs. This corrective action has been closed.

9. Satisfactory Continuing Control

Basic Requirement: The grantee must ensure that FTA-funded property will remain available to be used for its originally authorized purpose throughout its useful life until disposition.

Finding: During this Triennial Review of MCTS, a deficiency was found with the FTA requirements for Satisfactory Continuing Control. The County has excess FTA-funded real property located at 8450 West Beatrice Court in Milwaukee. Although the County has been in communication with the FTA Region 5 Office regarding this property and its planned disposal, the County did not prepare an Excess Real Property Inventory and Utilization Plan.

Corrective Action and Schedule: Following the site visit the County submitted to the FTA Region 5 Office an Excess Real Property Inventory and Utilization Plan for the Beatrice Road properties, which included all of the required elements. This corrective action has been closed.

10. Planning/Program of Projects

Basic Requirement: The grantee must participate in the transportation planning process in accordance with FTA requirements, MAP-21, and the metropolitan and statewide planning regulations. Each recipient of a Section 5307 grant shall develop, publish, afford an opportunity for a public hearing on, and submit for approval, a program of projects (POP).

Finding: During this Triennial Review of MCTS, no deficiencies were found with the FTA requirements for Planning/POP.

11. Public Comment on Fare Increases and Major Service Reductions

Basic Requirement: Section 5307 grantees are expected to have a written, locally developed process for soliciting and considering public comment before raising a fare or carrying out a major transportation service reduction.

Finding: During this Triennial Review of MCTS, no deficiencies were found with the FTA requirements for Public Comment on Fare Increases and Major Service Reductions.

12. Half Fare

Basic Requirement: For fixed route service supported with Section 5307 assistance, fares charged elderly persons, persons with disabilities or an individual presenting a Medicare card during off peak hours will not be more than one half the peak hour fares.

Finding: During this Triennial Review of MCTS, no deficiencies were found with the FTA requirements for Half Fare.

13. Charter Bus

Basic Requirement: Grantees are prohibited from using federally funded equipment and facilities to provide charter service if a registered private charter operator expresses interest in providing the service. Grantees are allowed to operate community based charter services excepted under the regulations.

Finding: During this Triennial Review of MCTS, no deficiencies were found with the FTA requirements for Charter Bus.

14. School Bus

Basic Requirement: Grantees are prohibited from providing exclusive school bus service unless the service qualifies and is approved by the FTA Administrator under an allowable exemption. Federally funded equipment or facilities cannot be used to provide exclusive school bus service. School tripper service that operates and looks like all other regular service is allowed.

Finding: During this Triennial Review of MCTS, no deficiencies were found with the FTA requirements for School Bus.

15. Security

Basic Requirement: As recipients of Section 5307 funds, grantees must annually certify that they are spending at least one percent of such funds for transit security projects or that such expenditures for security systems are not necessary.

Finding: During this Triennial Review of MCTS, no deficiencies were found with the FTA requirements for Security.

16. Drug Free Workplace and Drug and Alcohol Program

Basic Requirement: All grantees are required to maintain a drug-free workplace for all transit-related employees and to have an ongoing drug-free awareness program. Grantees receiving Section 5307, 5309 or 5311 funds that have safety-sensitive employees must have a drug and alcohol testing program in place for such employees.

Finding: During this Triennial Review of MCTS, a deficiency was found with the FTA requirements for Drug-Free Workplace and Drug and Alcohol Program. MTS contracts for maintenance services with Dependable Brake Systems to reline brakes used on MTS' vehicles. The County was unable to verify that the contractor has an FTA compliant Drug and Alcohol Testing Program.

Corrective Action and Schedule: No later than November 24, 2015, the County must submit to the FTA Region 5 Office evidence that Dependable Brake Systems has adopted and implemented an FTA compliant Drug and Alcohol Testing Program and communicated the policy to all of its safety sensitive employees.

17. Equal Employment Opportunity

Basic Requirement: The grantee must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity receiving federal financial assistance under the federal transit laws. (Note: EEOC's regulation only identifies/recognizes religion and not creed as one of the protected groups.)

Finding: During this Triennial Review of MCTS, a deficiency was found with the FTA requirements for Equal Employment Opportunity (EEO). The County receives Section 5307 grant funds for Non-Fixed Route ADA Paratransit Service (ALI 11.7C.00) and applies these funds in aggregate to its ADA operating expenses. As a result in FY2014, the amount of grant funds allocated to the paratransit contractor, Transit Express, Inc., exceeded \$1 million. Furthermore, Transit Express, Inc. also has more than 50 transit related employees. Although Transit Express, Inc. meets the thresholds for submitting a formal EEO Program to the County, no program has been submitted.

Corrective Action and Schedule: No later than November 24, 2015, the County must submit to the FTA Region 5 Civil Rights Officer evidence that Transit Express, Inc. has submitted an EEO Program in compliance with FTA C 4704.1.

V. Summary of Findings

Review Area	Finding	Deficiency	Corrective Action	Response Date	Date Closed
1. Financial Management and Capacity	ND				
2. Technical Capacity	ND				
3. Maintenance	ND				
4. ADA	ND				
5. Title VI	ND				
6. Procurement	D-183	No verification that excluded parties are not participating	Submit to the FTA Region 5 Office revised procurement procedures that describe how the County will ensure that procurements conducted by the Architecture, Engineering and Environmental Service Section will include verifications of excluded parties in the System for Award Management (SAM) for all applicable FTA-assisted third-party procurements in the future.	11/24/2015	08/10/2015
7. DBE	ND				
8. Legal	D-65	Officials do not have requisite authority	Submit to the FTA Region 5 Office procedures that describe how persons who PIN the Annual Certifications and Assurance in TEAM-Web have proper authority and PINs.	11/24/2015	08/10/2015
9. Satisfactory Continuing Control	D-84	Lacking excess real property utilization inventory/plan out of date	Submit to the FTA Region 5 Office an Excess Real Property Inventory and Utilization Plan for the Beatrice Road properties. The plan must include the following: <ul style="list-style-type: none"> • property location; • summary of any conditions on the title; • original acquisition cost; • Federal participation ratio; • FTA grant number; • appraised value and date; • description of improvements; • current use of the property; and • anticipated or proposed disposition or action. 	11/24/2015	08/10/2015
10. Planning/ POP	ND				
11. Public Comment on Fare Increases and Major Service Reductions	ND				
12. Half Fare	ND				
13. Charter Bus	ND				

Review Area	Finding	Deficiency	Corrective Action	Response Date	Date Closed
14. School Bus	ND				
15. Security	ND				
16. Drug-Free Workplace/ Drug and Alcohol Program	D-14	No drug and alcohol testing program	Submit to the FTA Region 5 Office evidence that Dependable Brake Systems has adopted and implemented an FTA compliant Drug and Alcohol Testing Program and communicated the policy to all of its safety sensitive employees.	11/24/2015	
17. EEO	D-144	Failure to obtain EEO plans from subrecipients/contractors exceeding threshold	Submit to the FTA Region 5 Civil Rights Officer evidence that Transit Express, Inc. has submitted an EEO Program in compliance with FTA C 4704.1.	11/24/2015	

VI. Attendees

Name	Title	Phone Number	E-mail Address
<i>Milwaukee County/MCTS</i>			
Dan Boehm	Managing Director	414-937-3272	dboehm@mcts.org
Mark Stein	Chief Administrative Officer	414-937-3204	mstein@mcts.org
Sandy Kellner	Chief Operating Officer	414-937-3205	skellner@mcts.org
Charteisha Carson-Clark	Chief Civil Rights & Labor Officer	414-937-3287	cclark@mcts.org
James Martin	Director of Administration-DOT	414-257-5987	james.martin@milwaukeecountywi.gov
John Rodgers	Senior Compliance Manager	414-257-5968	john.rodgers@milwaukeecountywi.gov
Steve Nigh	Grants Development Manager	414-257-5909	steven.nigh@milwaukeecountywi.gov
Tom Winter	Director of Schedule and Planning	414-937-3221	twinter@mcts.org
Mark Phillips	Contract Compliance Administrator	414-278-5104	mark.phillips@milwaukeecountywi.gov
Dan Pryba	Accounting Supervisor	414-344-4550	dpryba@mcts.org
Mark Sifuentes	Engineer	414-278-5138	mark.sifuentes@milwaukeecountywi.gov
Vijay Mehta	Managing Mechanical Engineer	414-278-4743	vijay.mehta@milwaukeecountywi.gov
Brian Engel	Engineer CBDP Compliance	414-278-4803	brian.engel@milwaukeecountywi.gov
Stephanie Baker	Director	414-937-9283	sbaker@mcts.org
Richard Walsh	Purchasing Agent	414-937-3241	rwalsh@mcts.org
Vamori Burgheim	Purchasing Agent	414-937-3293	vburgheim@mcts.org
Jennifer McIlhone	Buyer	414-937-3293	jmcilhone@mcts.org
Tracy Harrington	Director, Paratransit	414-343-1769	tharrington@mcts.org
Tom Zembruski	Asst. Director of Maintenance	414-343-1743	tzembruski@mcts.org
Bradley W. Sneddon	Director of Maintenance	414-937-3238	bsneddon@mcts.org
Kathi Miller	Manager of Employee Benefits	414-937-3270	kmiller@mcts.org
James Burns	Compliance Auditor	414-343-1701	jburns@mcts.org
<i>FTA Region 5</i>			
Lisa Joiner	Transportation Program Spec.	312-353-2791	lisa.joiner@dot.gov
Scott Schiemann	General Engineer	312-353-4118	scott.schiemann@dot.gov
Jay Ciavarella	Director Program Management and Oversight	312-353-1653	jason.ciavarella@dot.gov
Marisa Appleton	Civil Rights Officer for Oversight	202-744-0753	marisa.appleton@dot.gov
<i>Interactive Elements Inc.</i>			
George Pierlott	Reviewer	609-304-6253	george@pierlottassociates.com

VII. Appendices

No appendices included in this report.