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INTERNATIONAL BRIDGE, TUNNEL AND TURNPIKE ASSOCIATION

International Bridge, Tunnel and Turnpike Association
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December 17, 2021

Ms. Juli Huynh, Director, Office of Policy Coordination and Development
Office of the Assistant Secretary for Transportation Policy
c/o Docket of Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE, Room PL-401
Washington, D.C. 20590-0001

Subject: IBTTA Comments on Notice of Request for Public Comment, U.S. DOT Strategic Plan (Office of the Secretary - Docket No. DOT-OST-2021-0140)

Dear Director Huynh:

The International Bridge, Tunnel and Turnpike Association (IBTTA) appreciates the opportunity to comment on the U.S. Department of Transportation's (USDOT or Department) Notice of Request for Public Comment (RFC) published on December 3, 2021, regarding the USDOT Strategic Framework.

IBTTA is the worldwide association for the owners and operators of toll facilities and the businesses that serve the industry. Our mission is to advance transportation solutions through tolling and road pricing. Founded in 1932, IBTTA represents 131 toll operators in 34 states that operate 355 distinct toll facilities with more than 6,500 centerline miles. In 2019, these organizations processed 8.3 billion transactions, representing more than \$22 billion in toll revenue for investment and funding of transportation facilities and operations. IBTTA also has hundreds of members in more than 20 countries on six continents.

IBTTA supports the six goals in the USDOT Strategic Framework. IBTTA's comments on the RFC are set forth in this letter and the attachment. The attachment, IBTTA Response to the Request For Public Comment Questions, includes answers to the proposed RFC questions and provides a concise and convenient manner for USDOT staff to review IBTTA's response. The responses to the specific questions are intended to be read in the context of the points made in this letter.

Overview of USDOT Strategic Framework Goals

Safety – Make our transportation system safer for all people.

IBTTA and its members share the goal of safety as one of our highest priorities by providing a world-class system of well-maintained and safely operated toll roads, bridges, and tunnels. Toll facility owners and operators are committed to doing their part to reduce transportation-related serious injuries and fatalities.

Economic Strength & Global Competitiveness – Grow an inclusive and sustainable economy.

The toll operator members of IBTTA operate some of the most critical assets in the nation's highway system, accommodating high traffic volumes with a strong record of safety and reliability. There has never been a greater need to address infrastructure investment with proper funding. Toll facilities across the country play a key role in contributing to a vibrant and growing economy and strong productivity of transportation to maintain U.S. competitiveness on the global stage.

Equity – Reduce inequities.

IBTTA and its members take our stewardship of essential transportation facilities and services as a responsibility to ensure that equity, environmental justice, and access to opportunity are at the foundation of the outcomes these assets must deliver. Our Task Force on Diversity, Social and Racial Inclusion is advancing many programs to raise industry consciousness about the need to right wrongs of the past and to ensure access and opportunity for all Americans.

Climate & Sustainability – Tackle the climate crisis by ensuring that transportation plays a central role in the solution.

IBTTA welcomes the USDOT strategic goal related to climate and sustainability. The IBTTA community recognizes the harmful effects of climate change and the transportation industry's role in addressing objectives to care for the environment and manage the consequence of years of neglect. Our Task Force on Sustainability and Resilience is promoting best practices, exploring use of alternative fuels and renewable energy in toll facility operations, researching the use of performance management and metrics to drive environmental objectives and outcomes, and seeking partnerships to establish guidelines and tools for mitigating climate change and enhancing resiliency of critical assets.

Transformation – Design for the future.

IBTTA welcomes the recognition by the USDOT of the important role that technology, research, data, and collaboration play in the transportation arena.

The transportation operators and business members of IBTTA are experts in transportation finance, infrastructure, operations, technology, and management, and are uniquely positioned to leverage user payment principles to guide equitable mobility solutions and investment for the future.

Organizational Excellence – Strengthen our world class organization.

Many of the objectives listed in the USDOT Strategic Framework related to Organizational Excellence are shared by IBTTA members – improved customer service; attracting and retaining a quality workforce development; the importance of data-driven programs and policies; and the use of evidence-based budgeting. By sharing best practices and experiences, USDOT and IBTTA members can achieve the desired outcome of this strategic goal.

IBTTA members stand ready to assist the Department in implementing the USDOT Strategic Framework. If you have any questions, please do not hesitate to contact Mark Muriello, Director of Policy and Government Affairs at 201-249-3982 or mmuriello@ibtta.org.

Sincerely,



Mark Compton
President, IBTTA
CEO, Pennsylvania Turnpike
Commission



Patrick D. Jones
Executive Director & CEO
IBTTA

**IBTTA Comments for on Notice of Request for Public Comment
U.S. DOT Strategic Plan Office of the Secretary
Docket No. DOT-OST-2021-0140**

IBTTA Responses to Request for Public Comment Questions

1. What strategies or priorities should the U.S. DOT adopt to achieve the Department's strategic goals and objectives?

The “Transformation” strategic goal would benefit from more focus and relevance to decision-making and innovation in this goal.

Additional objectives and strategies could address:

- a. Data and Information: Support for leveraging the exponential growth in transportation data and the role of information in effective transportation management programs and systems in the future.
- b. Modal Integration: How technology and innovation may optimize performance of the transportation system across modes to drive efficiencies and global competitiveness.
- c. Partnerships: Recognize that 21st century solutions and strategic outcomes will require an array of partnerships among transportation operators, infrastructure providers, state and other public agencies, technology companies, vehicle manufacturers, financial institutions, and many third-party service providers. Ensuring a wide range of participants in the development of transportation operations and service delivery models will support public acceptance of new transportation solutions through a variety of value propositions and service options for users.
- d. Requirement-based Approaches to Planning and Project Implementation - Project development and implementation based on clearly defined functional and technical requirements will protect investments by ensuring solutions are flexible, scalable, and adaptable to changing technologies.

3. What emerging challenges or opportunities in transportation warrant additional U.S. DOT activities or investments?

There are no financial goals or objectives in the draft USDOT strategic planning framework. The U.S. has been facing a growing transportation revenue crisis that concerned transportation professionals have been warning about for decades. The federal motor fuels taxes are unable to provide a sustainable source of ongoing transportation funding and investment financing with the growing fuel efficiency of modern vehicles and the conversion of vehicle propulsion to electric power and other alternative fuels. There is an urgent need for the Department to recognize the need for ongoing, sustainable, and dedicated sources of transportation revenue.

Federal support of user fees as a reliable transportation revenue source has diminished, as evidenced by the increasing reliance on General Fund transfers to maintain the solvency of the Highway Trust Fund. User fees represent dedicated revenue tied to travelers' use of transportation assets, promoting a fair and equitable financial policy and a clear value proposition for users. The USDOT Strategic Framework should address the role of user fees in sustaining the desired outcomes, including gas taxes, tolling, and the potential for future mileage-based user fees.

4. How can U.S. DOT best coordinate its activities with Federal, State, local, tribal, labor, private sector, academic, non-profit, international, and other stakeholders?

USDOT needs to provide stakeholders with opportunities to engage in the federal transportation program and policy process. This includes the owners and operators of this nation's toll facilities. IBTTA welcomes collaboration with USDOT in many areas such as the Federal System Funding Alternative Advisory Board, Electric Vehicle Infrastructure Charging, Congestion Reduction, and other topics where IBTTA member expertise can assist the Department.

5. How can U.S. DOT best utilize additional programs and authorities in the Infrastructure Investment and Jobs Act to accomplish the goals laid out in the strategic plan?

The Infrastructure and Jobs Act has committed historic levels of spending in competitive and discretionary grant programs, opening federal funding to organizations and projects that have not historically had access to federal funding but are worthy of investment and have significant public benefits. An important strategy and priority should ensure sufficient outreach and communications to those unfamiliar with federal application processes and requirements. Measurement of numbers of new funding recipients would be valuable in understanding the effectiveness of outreach.