



Sept 9, 2022

Attn: Dennis Mulligan, Chair, Network Management Business Case Advisory Group
Re: Methodology Change for Network Management Business Case
Sept 12th Network Management Business Case Advisory Group

Chair Mulligan,

As groups that have taken a keen interest in the recovery and transformation of the Bay Area's transit system, we wish to express concern over the recent shift in methodology in the Network Management Business Case.

We recommend that the “bottom-up analysis” presented in the Sept 12th update be combined with the continued analysis and assessment of more comprehensive regional network manager structures identified in [the September 2021 RNM Structure Evaluation Summary Report](#), and which were previously presented to both the MTC and the Network Management Business Case Advisory Committee, in order to inform the ultimate recommendation for a long-term network management structure.

The shared vision supported by the Blue Ribbon Transit Recovery Task Force in the Transformation Action Plan was **a system with integrated service, fares, schedules, customer information and identity**. The network management business case was initiated with the goal of identifying a path toward institutional changes to bring about the shared vision.

Our primary concern is the updated methodology described in the September 12th meeting materials may represent a step away from the principle of "begin with the end in mind"- creating a resilient long-term institutional structure that can grow to fulfill the vision of a rider-friendly, high-ridership system.

We understand that the revised “bottom-up” analytical framework seeks to improve confidence of the value of regionalizing key transit system functions by spelling out the benefits - and, where possible, citing data and existing studies that establish a clear basis for institutional change. This can be helpful in building consensus among elected officials and staff. But this should not come at the expense of evaluating comprehensive long-term network management structures for the additional value they will bring.

The proposed revised methodology risks pointing us toward an “a la carte” network management approach, which we are concerned will underestimate the potential value or strategic case for larger scale, more comprehensive strategic institutional reforms. By itemizing the costs and benefits of regional standards for specific functions, we may fail to recognize the strong synergies between different system functions that would be best overseen by a common decision-making structure. Synergies have already appeared between the Wayfinding and Fare Coordination and Integration Study, and would logically arise when considering Network Planning and Transit Priority, and other functions. Surely, there are synergistic benefits to coordinated schedules, integrated fares, and faster, more reliable service that are greater than the sum of the parts.

Without a holistic path toward integrated service enabled by effective governance, we will not be able to put the Bay Area on track to reach its ambitious mode shift and climate goals - in the near or long term.

In the Blue Ribbon Task Force, there was consensus about a set of functions that would benefit from unified network management to provide the best, most coordinated, easy to use, accessible rider experience. It is concerning that the proposed methodology seems to be re-opening questions that seemed settled by consensus earlier, and which were presented to the Metropolitan Transportation Commission a year ago.

We urge you to follow the recommendations of the [RNM Structures Evaluation Summary Report](#) completed at the end of the Blue Ribbon Task Force. That report recommended:

- **Recommendation 1** - Start with “how” not “whether” to regionalize regional transit accountabilities.
- **Recommendation 5** - Separate long term ‘entity design’ roles and responsibilities from near term initiative priorities
- **Recommendation 8** - Priority RNM roles should be the primary driver of entity design
- **Recommendation 14** - Distinguish business decisions from public policy decisions

In summary, rather than shift purely to a bottom-up approach, we recommend that the bottom-up analysis be combined with the continued analysis and assessment of more comprehensive regional network manager structures identified in [the September 2021 RNM Structure Evaluation Summary Report](#), and which were previously presented to both the MTC and the Network Management Business Case Advisory Committee, in order to inform the ultimate recommendation for a network management structure.

Thank you,

Ian Griffiths, Policy Director
Seamless Bay Area

Sheri Burns, Executive Director
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Amy Thomson, Transportation Policy Analyst
TransForm

Russ Hancock, President and CEO
Joint Venture Silicon Valley

Jason Baker, Senior Vice President, Infrastructure & Regional Partnerships
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