





Chair Mulligan and Executive Director McMillian,

We appreciate the extensive discussion of the preliminary regional network management structure presented at the November 14th Network Management Advisory Group meeting. Contemplating changes to how we govern and manage transit is difficult, but progress on Network Management is essential to building the collective trust and alignment necessary for the region to address the urgent fiscal challenges transit faces over the coming years. While the proposed structure represents a significant step, we believe there are a number of areas where the proposal could be strengthened and clarified. Our organizations hope to see the below comments addressed in December when a refined proposal is scheduled to be presented to the Advisory Group.

- 1) Clarify and strengthen policy-maker engagement. The proposed Regional Network Management (RNM) structure relies heavily on a staff-level "Executive Board" to direct a range of complex work. This approach should be balanced with more detail regarding how policymakers (via the Metropolitan Transportation Commission acting as the "Regional Visioning" element) will be meaningfully engaged on an ongoing basis. We strongly encourage the designation of an MTC committee to facilitate regular, in-depth involvement by Commissioners in the work of network management. We further urge that membership on this committee be expanded to include participation by a select group of transit-agency board members, state appointees, and customer representatives.
- 2) Set a defined term and scope. The preliminary RNM structure is an interim step and we believe that it should be bound to a defined timeframe and a specific scope of work that is mutually agreed to by both MTC and the RNM Executive Board. We suggest an initial time frame of two years with an option to extend duration based on the performance of the preliminary RNM, the need to add or adjust scope, and progress toward the development of a more durable long term RNM structure.
- 3) Commit to evaluating performance and evolving structure. Given that the proposed structure is preliminary, the MTC will need to undertake a parallel process to identify and work toward the implementation of a long-term RNM model. We believe the MTC should

initiate this process in 2023 and should also plan to evaluate the performance of the preliminary RNM structure as a basis for both informing the design of the permanent RNM model and for making interim improvements. While the RNM Executive Board will be a critical stakeholder in this effort, it should not direct the work. Governance changes are inherently the realm of policymakers and it is not appropriate for a staff body to directly oversee or direct this effort as part of their scope.

- 4) Define the 'Advisory Function' and ensure customer representation. The "Voice of the Customer" Advisory Function should be more clearly defined. Rather than creating an additional body, we suggest adapting the existing Policy Advisory Council Transit Transformation Action Plan Subcommittee to serve this function and further suggest clarifying that this group has an advisory relationship to the MTC and its committees (and not to the RNM Executive Board). Finally, we urge MTC to consider that in addition to an advisory committee, detailed market research, customer surveys and data analysis are an essential way to understand the "voice" of the customer. These types of activities should be included and resourced as part of the administrative and operations element in the preliminary RNM structure.
- 5) Strengthen and add detail to staffing approach. We strongly support the proposal for dedicated staffing, particularly the potential for the seconding of transit agency and MTC staff within a unified structure. We suggest clarifying that the reporting structure for staff runs through the MTC Executive Director and we urge both MTC and the operators to provide this group with the necessary resourcing and internal authority to successfully execute on an ambitious and challenging work program.

Thank you for your consideration of these comments and your ongoing work to improve our region's transit systems. We look forward to continuing the discussion at the next Network Management Advisory Group meeting in December.

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