



**STATE OF TENNESSEE  
DEPARTMENT OF TRANSPORTATION**

**COMMISSIONER'S OFFICE**  
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**CLAY BRIGHT**  
COMMISSIONER

**BILL LEE**  
GOVERNOR

July 9, 2021

Ms. Nuria Fernandez, Administrator  
Federal Transit Administration  
1200 New Jersey Avenue SE, 4<sup>th</sup> Floor  
Washington, D.C. 20590

RE: 49 USC 5311(f) – Intercity Bus Program

Dear Ms. Fernandez:

I write today as Governor Bill Lee's designee in matters involving the State of Tennessee and the Federal Transit Administration (FTA). I hereby certify to the Secretary of the United States Department of Transportation that the intercity bus service needs of the State are being met adequately. Pursuant to 49 U.S.C. 5311(f)(2), the State accordingly does not intend to expend 15 percent of its federal fiscal years 2021, 2022, and 2023 Section 5311 apportionments to carry out a program for the development and support of intercity bus transportation as would be required by federal law in the absence of this certification.

In June 2021, the State completed a comprehensive assessment of statewide intercity bus mobility needs which included:

- a review of previous studies,
- a survey of statewide stakeholders (local governments, intercity bus riders, rural transit users, chambers of commerce, trip generators) and a survey of intercity bus and transit service providers,
- discussions with the Tennessee Public Transportation Association (TPTA) to assess intercity bus needs relative to other rural needs in the state,
- identification of intercity bus providers in the state, station locations, route locations, route frequencies, and feeder routes,
- geospatial analysis of existing station location and population coverage, and
- a transit propensity analysis using U.S. Census data.

As part of Tennessee's statewide intercity bus needs assessment, the State consulted with affected intercity bus operators. That consultation process contained:

- an identification of intercity bus providers in the State,
- consultation activities with identified providers and intercity bus organizations,
- an opportunity for intercity bus providers to submit proposals for funding a part of the State's distribution of its annual apportionment, and
- a direct correlation between the results of the consultation process and a determination that the State's intercity service needs are being met adequately.

Key findings from the assessment and consultation process found:

- over 80 percent of Tennessee residents live within 25 miles of an intercity bus station,
- public transportation is available in all 95 counties of Tennessee including feeder service and general rural demand response service to intercity bus station locations,
- no intercity bus routes were eliminated and no stations were closed due to the COVID-19 pandemic,
- intercity bus providers during the consultation process did not provide specific data to detail or specific proposals to implement intercity bus service that would address unmet demand for the service (only the need to maintain current intercity bus services),
- intercity bus providers emphasized the need for continued communication and coordination with other transportation providers for scheduling and fare ticketing, and
- based on the level of demand and services throughout Tennessee intercity bus needs are being adequately met.

If you have any questions regarding this matter, please do not hesitate to contact, Daniel Pallme, Interim Director of the Division of Multimodal Transportation Resources at 615-741-4031.

Sincerely,



Clay Bright  
Commissioner

cc: Dr. Yvette Taylor, Administrator, FTA Region IV  
Robert Buckley, Director, Office of Financial Management & Program Oversight, FTA Region IV  
Michael Sherman, Community Planner, FTA Region IV  
Preston Elliott, Deputy Commissioner/Chief of Environment and Planning, TDOT  
Daniel Pallme, Assistant Chief of Environment and Planning / Interim Director Multimodal, TDOT  
Larry Sanborn, Assistant Director, Multimodal Division, TDOT  
Kaitlyn McClanahan, Transit Administration Manager, Multimodal Division, TDOT