

September 6, 2007

TO: Chairman Gibbons and Commissioners

FROM: Alfred H. Harf
Executive Director

RE: Fleet Maintenance Remedial Action Plan – Status Report

Introduction

At the July 2007 meeting, the Commission was informed of the results of the spring 2007 fleet maintenance audit. The July 2007 information report and accompanying independent audit report found aspects of First Transit's maintenance performance wanting. In response to the audit report findings (and the findings of a companion analysis of service interruptions that PRTC's fleet inspection contractor – the Transit Resource Center [TRC] – did at PRTC's request), First Transit was directed to produce a remedial action plan, and the Commission asked for a follow-up briefing at the September 2007 meeting so the content of the action plan and the status of implementation efforts could be discussed.

The Issues Triggering the Need for the Plan

Two developments over the course of the past year evidenced a need for changes in the “fleet maintenance” practices:

1. The “service interruptions” statistic that is routinely tracked began trending in the wrong direction. This statistic measures the number of miles between service interruptions such that the larger the number, the better the performance. Service interruptions are a consequence of multiple factors (e.g., mechanical breakdowns; operator errors; accidents; etc.) and the interruptions are categorized by type so the data can be analyzed to hone in on causes. When this statistic began trending downward significantly, it became a topic of extended discussion between PRTC and First Transit management. PRTC management repeatedly asked First Transit to “drill down” into the data to see if patterns were present, and when this didn't happen, PRTC management tasked TRC to do an analysis of the service interruptions that provided further insights about problem areas.

2. The mixed results in the spring 2007 independent audit report. While the audit found that total defects per bus was substantially the same as it was in the prior year audit, the incidence of “A-level” defects¹ increased significantly (more cosmetic types of defects improved significantly, offsetting the rise in “A-level” defects and causing the “total defects per bus” statistic to turn out substantially the same). The significant rise in “A-level” defects was highlighted as a concern, since these types of defects are safety-related.

First Transit’s Plan

First Transit prepared a first draft of the plan and provided it to PRTC management for review in July. PRTC management had a number of constructively critical reactions, and since then there have been several iterations. The most recent draft of the plan was provided to PRTC management on August 17th (attachment one) and, while it is much improved compared to the original draft, it is not yet a finished product. On August 22nd, PRTC management reacted to the August 17th draft (attachment two), and First Transit is now working on further refinements in response to PRTC’s reactions, which is expected to result in a plan fully acceptable to PRTC management.

Since facets of the prospective plan have already been well received by PRTC management, implementation efforts are already underway that PRTC management is monitoring. While the plan is not yet a finished product, its constituent parts can be described in summary terms, as the balance of this informational item will do:

1. Stepped-up training for operators and maintenance technicians. To some degree, the diagnosed problems are a consequence of procedural non-compliance. Operator pre- and post-trip inspections are essential sources of information for flagging “repair” needs, and inspections have not been uniformly thorough. Also, there are indications that preventive maintenance inspections (PMIs) have not been uniformly thorough. And finally, some of First Transit’s technicians have not succeeded in passing ASE certification tests despite training efforts to-date. As a result, First Transit is reinforcing its training regimen for both groups.

¹ “A-level” defects are those defects that are safety-related, such that they warrant repair before the bus is released for revenue service, whether it is a defect found during preventative maintenance inspections (PMI) or otherwise. “A-level” defects have been defined by TRC, using the U.S. DOT Federal Motor Carrier safety Administration (FMCSA) requirements as a starting point. The same definition has been in use by PRTC/TRC for some time.

2. Enhanced quality assurance (QA) efforts. QA has always been an integral part of First Transit's managerial oversight, but these efforts are in the process of being augmented. Newly conceived QA practices include:
 - Random checking of operators' post-trip inspections to verify thoroughness and to re-train/mentor/discipline operators as necessary;
 - Reinvigoration of the fleet inspection program in which the maintenance manager randomly samples 10% of the fleet each month to identify PMI lapses (if any);
 - An enhanced QA check on completed PMI's;
 - Newly instituted audits by the QA manager and Goodyear to insure compliance with the "tire-related" standards;
 - Stepped-up service island inspection audits by the QA manager; and
 - Random sampling of the fuel dump to monitor fuel quality and flag problems if and when they arise.
3. Master technician recruitment enhancements. First Transit has boosted the starting salary for ASE certified master technicians in light of its recent market assessment, which is already yielding dividends recruitment-wise.
4. Increased service technician headcount. First Transit has authorized the hiring of an additional technician in light of the growth in both the active fleet size and hours of operation. Still under discussion is the question of how staffing adequacy in this area will be measured going forward, with the aim of establishing an agreed-upon approach for deciding whether further supplementation of "technician" staff is necessary.
5. Redefinition of "minimum qualifications" requirements for service technicians. First Transit and PRTC management are continuing to discuss a prospective contract change in which "relevant experience" requirements would be lengthened in exchange for relaxing the "at least one ASE certification" requirement that is now part of the contract specification. While ASE certifications would still be sought in recruiting for new hires, the change

would surely make recruitment easier without compromising proficiency, in First Transit's judgment. Such a change would be brought to the Commission for approval as a change order to the contract.

Also under discussion is the handling of existing service technicians that do not meet the existing or prospective changed qualification requirements.

6. Procedural changes. Certain changes are designed to disseminate time-sensitive information more quickly and facilitate more timely maintenance efforts - some have been or are in the process of being made, namely:
 - Expedited transmittals of pre-trip inspection reports/findings to maintenance so maintenance management has more time to organize necessary maintenance work;
 - The establishment of designated lane where vehicles requiring repair (as documented in the operators' *Driver Vehicle Condition Reports [DVCR]*) can be placed for expedited handling; and
 - Timelier "vehicle down list" entries in TransTrack so dispatch staff has improved "real-time" knowledge of which buses are available for substitute assignment as necessary.

Still other changes are designed to improve information-gathering/work flow and reduce the incidence of predictable service interruptions, including:

- Form enhancements to facilitate the identification of defects;
- Presence of a stand-by technician during morning and afternoon pull-outs to handle small issues;
- Renewal of the service island inspection process so the service crews check fluids regularly to minimize, if not eliminate entirely, the incidence of service interruptions for these reasons; and
- Changing-out the OmniLink Gillig buses in a different fashion to reduce "low fuel" incidents.

7. Specifications changes. Several such changes have been or are being made, namely:
 - The inception of a maintenance campaign to eliminate “emergency” window-related “A-level” defects, featuring an updated standard and entry on the PMI form;
 - A change to the “tire tread depth” standard (i.e., from 2/32 of an inch to 4/32 of an inch); and
 - Exploring (with engine manufacturers) the possibility of adjusting “parameters” to lessen the incidence of unnecessary alarms and warnings.
8. Refined audit protocol. To enhance the audit process, the following changes have been made or are being made:
 - Three-times annually independent audits of 33% of the fleet rather than a once-yearly audit of 100% of the fleet (this is a change that PRTC management is instituting with the Commission’s sanction, independent of the First Transit- authored plan);
 - A refined inspection form to make the findings and First Transit’s response to the findings more transparent; and
 - A renewed pledge by First Transit to witness all of the inspections and provide immediate feedback on any finding it believes is contestable.
9. Maintenance management personnel changes. First Transit has seen fit to replace its maintenance manager and its QA manager, decisions that PRTC management supports. The new appointments have been vetted and approved by PRTC management. The new maintenance manager (Todd Johnson) is already onboard and the new QA manager (Jerry Vincent) will commence work on September 10th. Both are veteran managers in their respective areas and had outstanding reference checks.

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Pending action

As this report is being written, First Transit's response to the August 22nd PRTC management reactions is still in preparation. If completed prior to the September 6th Commission meeting, it will be furnished. In either event, PRTC and First Transit management are prepared to discuss the status and respond to any questions that this information report may prompt.

Attachments: As stated