



Commonwealth of Massachusetts
Office of the State Auditor
Suzanne M. Bump

Making government work better

Official Audit Report – Issued July 2, 2018

Cape Cod Regional Transit Authority

For the period July 1, 2015 through June 30, 2017





Commonwealth of Massachusetts
Office of the State Auditor
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Making government work better

July 2, 2018

Mr. Thomas Cahir, Administrator
Cape Cod Regional Transit Authority
215 Lynnough Road
PO Box 1988
Hyannis, MA 02601

Dear Mr. Cahir:

I am pleased to provide this performance audit of the Cape Cod Regional Transit Authority. This report details the audit objectives, scope, methodology, findings, and recommendations for the audit period, July 1, 2015 through June 30, 2017. My audit staff discussed the contents of this report with management of the agency, whose comments are reflected in this report.

I would also like to express my appreciation to the Cape Cod Regional Transit Authority for the cooperation and assistance provided to my staff during the audit.

Sincerely,

A handwritten signature in blue ink, appearing to read "SMBump".

Suzanne M. Bump
Auditor of the Commonwealth

cc: Stephanie Pollack, Secretary of Transportation and Chief Executive Officer, Massachusetts Department of Transportation (MassDOT)
Sally Atwell, Director of Internal Special Audit, MassDOT

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LIST OF ABBREVIATIONS

CCRTA	Cape Cod Regional Transit Authority
EOAF	Executive Office for Administration and Finance
FTA	Federal Transit Administration
MassDOT	Massachusetts Department of Transportation
MBTA	Massachusetts Bay Transportation Authority
RTA	regional transit authority
RTD	Rail and Transit Division

EXECUTIVE SUMMARY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of the Cape Cod Regional Transit Authority (CCRTA) for the period July 1, 2015 through June 30, 2017. In this performance audit, we assessed certain aspects of CCRTA's preventive maintenance activities related to its fleet of vehicles, including equipment and vehicles for transporting passengers with disabilities under the requirements of the Americans with Disabilities Act of 1990. We also examined CCRTA's use of its non-revenue-producing vehicles, as well as its compliance with the General Laws regarding providing its financial records to the Secretary of Administration and Finance for public disclosure.

Below is a summary of our findings and recommendations, with links to each page listed.

Finding 1 Page 10	CCRTA did not submit required financial information to the Commonwealth to be made available to the public on a searchable website.
Recommendations Page 11	<ol style="list-style-type: none">1. CCRTA should develop formal policies and procedures for submitting this required information to the Executive Office for Administration and Finance.2. CCRTA should establish monitoring controls to ensure that the staff members assigned to this task adhere to these policies and procedures.
Finding 2 Page 11	CCRTA did not properly document the use of its non-revenue-producing vehicles by its employees.

Recommendations
Page 12

1. CCRTA should establish policies and procedures, consistent with those established by the Massachusetts Department of Transportation for its non-revenue-producing vehicles, that require a log that documents the following:
 - a. the name and driver's license expiration date of the employee who used the vehicle
 - b. the date and time the vehicle was picked up
 - c. the date and time the vehicle was returned
 - d. the vehicle's license plate number
 - e. the vehicle description
 - f. the intended destination and purpose
 - g. the beginning odometer reading
 - h. the condition of the vehicle before and after use
 - i. any damage
 - j. any maintenance issues identified during use
2. CCRTA should ensure that these policies and procedures include monitoring controls to ensure that they are adhered to.

OVERVIEW OF AUDITED ENTITY

Regional Transit Authorities

Chapter 161B of the Massachusetts General Laws established regional transit authorities (RTAs) to provide a public transportation system under the control of municipalities. Each RTA supports a number of communities (member communities) and is governed by an advisory board composed of the chief elected officials from those communities. Chapter 161B of the General Laws gives the Commonwealth certain oversight responsibilities, and it defines the process by which RTAs may be formed or expanded within the Commonwealth, as well as the duties, powers, and limitations of these RTAs. This law also outlines the membership of RTA advisory boards and their authority to appoint administrators, approve budgets, and approve significant changes in service fares. Currently, there is a network of 15 RTAs (12 urban and 3 rural) operating in the Commonwealth, in addition to the transit services provided by the Massachusetts Bay Transportation Authority (MBTA). These RTAs serve a total of 262 cities, suburban municipalities, and rural communities outside the greater Boston area and provide transportation via buses and minibuses operated by private transit service companies. RTAs, which are locally controlled, manage their own operations but must hire private operating companies to provide their services in accordance with Chapter 161B of the General Laws.

Section 53 of Chapter 6C of the General Laws makes the Rail and Transit Division (RTD) of the Massachusetts Department of Transportation “responsible for overseeing, coordinating and planning all transit and rail matters throughout the commonwealth,” including intercity buses, the MBTA, and RTAs. RTD carries out its responsibility of providing and managing financial assistance for RTAs through its Community Transit Program Unit, which oversees the federal, state, and local programs that financially support RTAs. State appropriations for the 15 RTAs increased from approximately \$70 million in fiscal year 2014 to approximately \$80 million in fiscal years 2016 through 2018.

The Cape Cod Regional Transit Authority

The Cape Cod Regional Transit Authority (CCRTA) was established on October 13, 1976 and reports to RTD under Chapter 25 of the Acts of 2009, “An Act Modernizing the Transportation Systems of the Commonwealth.” According to its website, CCRTA’s mission is “to provide excellent customer service through efficient, reliable, safe, and affordable transit options to all of our customers and communities.” An administrator is responsible for day-to-day administration of the agency, which had 14 full-time and

2 part-time staff members during our audit period. CCRTA’s operations are overseen by an advisory board made up of one member from each of the 15 communities¹ the agency serves and a disabled-commuter representative. The advisory board is responsible for hiring an administrator, setting fares, establishing service levels, and authorizing real-estate purchases. During our audit period, CCRTA contracted with Eastern MA Transit Company, a subsidiary of MV Transportation, Inc., to provide fixed-route and demand-response² transportation services, including maintenance and administrative functions.

During our audit period, CCRTA’s capital contributions were \$3,611,836 for fiscal year 2016 and \$3,279,273 for fiscal year 2017.

In fiscal years 2016 and 2017, CCRTA received revenue from a variety of sources, including fares from riders and assistance from various federal, state, and local sources. The largest source of funding is brokerage service³ income, followed by Federal Transit Administration (FTA) grants, state contract assistance,⁴ local assessment⁵ payments, and farebox revenue. The table below shows the types of funding CCRTA received during the audit period.

CCRTA Operating Funding Sources

Type of Funding	Fiscal Year 2016	Fiscal Year 2017
Farebox Revenue	\$ 1,528,117	\$ 1,438,920
Brokerage Service Income	10,744,036	11,178,494
Federal Grants	4,908,061	6,716,948
State Contract Assistance	4,394,256	4,440,656
Local Assessments	1,823,151	1,868,730
Parking	246,852	232,308
Other Funds*	138,880	87,446
Total	<u>\$23,783,353</u>	<u>\$25,963,502</u>

* Other funds include shuttle fares and reimbursements.

1. The communities are Barnstable, Bourne, Brewster, Chatham, Dennis, Eastham, Falmouth, Harwich, Mashpee, Orleans, Provincetown, Sandwich, Truro, Wellfleet, and Yarmouth.
2. Demand-response transportation services are those that run on a flexible schedule and on flexible routes based on the needs of RTA passengers with special needs.
3. Brokerage services are contracted transportation for eligible residents who receive services through certain human-service agencies.
4. Under Section 23 of Chapter 161B of the General Laws, the Commonwealth, through the Executive Office for Administration and Finance, can contract with an RTA to fund 50% of the net cost of the service the RTA provides. Known as state contract assistance, this funding is provided through the Commonwealth Transportation Fund and the Massachusetts Transportation Trust Fund.
5. Under Section 9 of Chapter 161B of the General Laws, annual local assessment payments are adjusted based on the “loss” (operating cost minus revenue) for each specific transit route and the activity and the share of that loss attributable to each town or city.

During our audit period, CCRTA’s operating costs were as follows.

CCRTA Operating Expenses

Type of Expense	Fiscal Year 2016	Fiscal Year 2017
Transit Service	\$ 19,237,506	\$ 20,107,803
Maintenance	3,388,513	3,908,723
Other Operating Expenses	1,271,180	1,708,738
Total	<u>\$ 23,897,199</u>	<u>\$ 25,725,264</u>

Vehicle Fleet and Service Route Area

CCRTA operates local fixed-route and demand-response services within the 394-square-mile Cape Cod area, serving a population of more than 200,000. It operates a network of seven local transit routes, six commuter routes, and three supplemental seasonal trolley routes. The local fixed-route service operates six days a week; weekday service runs from as early as 5:30 a.m. to 9:00 p.m., and Saturday service runs from 5:30 a.m. to 9:00 p.m. The supplemental seasonal trolley routes operate seven days a week in the summer, from as early as 7:00 a.m. to 10:35 p.m.

Minibuses provide transit services to the vast majority of CCRTA’s passengers, and its vanpool provides paratransit services. The table below shows the number of revenue-producing and non-revenue-producing vehicles⁶ used at CCRTA during fiscal years 2016 and 2017.

Number of CCRTA Vehicles

Vehicle Type	Fiscal Year 2016	Fiscal Year 2017
Revenue-Producing	84	96
Non-Revenue-Producing	7	10
Total	<u>91</u>	<u>106</u>

Vehicle Maintenance

CCRTA operates its administrative office and a maintenance facility in an approximately 19,435-square-foot building in South Dennis. At the end of our audit period, CCRTA had a total of 106 vehicles in its fleet. The table below shows the types and average ages of the vehicles in CCRTA’s fleet during the audit period.

6. Non-revenue-producing vehicles are light-duty vehicles for temporary use by CCRTA employees for agency-related business.

CCRTA Vehicle Fleet Average Age

Make and Model	Vehicle Type	Vehicle Count	Average Age (Years)
Gillig Standard Low Floor	Bus	26	9
Ford E450	Minibus	57	2
Ford F550/F350	Truck	3	4
Ford/GMC Van	Van	5	7
Ford E350	Minibus	13	7
John Deere Forklift	Mobile Equipment	2	5

The table below shows CCRTA's maintenance expenses for the audit period.

CCRTA Maintenance Expenses

Expenses	Fiscal Year 2016	Fiscal Year 2017
Salaries	\$ 1,871,774	\$ 1,894,017
Parts and Equipment	504,772	603,638
Contract Maintenance and Management Fees	566,812	730,291
Insurance	349,031	443,735
Other Maintenance	96,124	237,042
Total	<u>\$ 3,388,513</u>	<u>\$ 3,908,723</u>

Below are the actual mileage and maintenance costs per vehicle for fiscal year 2017.

CCRTA Vehicle Mileage and Maintenance Expenses

Make and Model	Vehicle Count	Total Mileage	Labor Cost	Parts Cost	Total Maintenance Cost	Average Maintenance Cost per Vehicle
Gillig Standard Low Floor	26	1,241,672	\$ 430,215	\$ 433,922	\$ 864,137	\$33,236
Ford E450	57	1,626,644	307,759	85,159	392,918	\$6,893
Ford F550/F350	3	3,878	5,765	2,240	8,006	\$2,669
Ford/GMC Van	5	52,730	8,725	2,443	11,168	\$2,234
Ford E350	13	62,064	7,645	6,032	13,678	\$1,052
John Deere Forklift	2	N/A	1,144	114	1,258	\$629
Total	<u>106</u>	<u>2,986,988</u>	<u>\$ 761,253</u>	<u>\$ 529,910</u>	<u>\$ 1,291,165</u>	

FTA requires all RTAs to report to it any information related to their transit vehicle inventories or maintenance and repairs that they conduct. This information is included in FTA's National Transit

Database. At the time of our audit, CCRTA was using fleet management software called Ez Bus to document all of its vehicle asset and expense information and report it to FTA.

CCRTA Community Programs

CCRTA created a Youth Educational Program to educate students in the Cape Cod community on all of the public transportation options available throughout Cape Cod. CCRTA also owns and operates the Hyannis Transportation Center, a hub of intermodal transportation that provides coordinated and efficient transportation in Cape Cod's surrounding communities. During weather-related emergencies (e.g., snowstorms or hurricanes), CCRTA provides emergency transportation to and from shelters for people in need. CCRTA has recently initiated a collaborative effort with Cape Cod Healthcare, the area's largest employer, to help schedule transportation for Medicaid-eligible patients, offer discounted transportation to low-income hospital employees, and alleviate parking congestion by shuttling hospital employees from remote parking lots.

AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of certain activities of the Cape Cod Regional Transit Authority (CCRTA) for the period July 1, 2015 through June 30, 2017.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Below is a list of our audit objectives, indicating each question we intended our audit to answer; the conclusion we reached regarding each objective; and, if applicable, where each objective is discussed in the audit findings.

Objective	Conclusion
1. Did CCRTA maintain a cost maintenance log for each vehicle to ensure that preventive maintenance for vehicles and equipment for transporting passengers with disabilities under the requirements of the Americans with Disabilities Act of 1990 was up to date per Federal Transit Administration (FTA) guidelines?	Yes
2. Did CCRTA submit all required financial records to the Commonwealth for inclusion on the Commonwealth's searchable website as required by Section 14C of Chapter 7 of the General Laws?	No; see Finding <u>1</u>
3. Did CCRTA properly manage the use of its non-revenue-producing vehicles?	No; see Finding <u>2</u>

To achieve our audit objectives, we gained an understanding of CCRTA's internal controls that we deemed significant to our audit objectives through inquiries and observations, and we evaluated the design of controls over cost maintenance logs, financial reporting to the Commonwealth, and non-revenue-producing vehicles.

In addition, we performed the following procedures to obtain sufficient, appropriate audit evidence to address the audit objectives.

- We analyzed the data in the Ez Bus software maintained by CCRTA, which documents all vehicle fleet maintenance and repairs, to determine whether all vehicles used and vehicle maintenance performed during the audit period were properly documented.
- We verified that CCRTA had a vehicle maintenance schedule and tested to determine whether the agency followed the recommended schedule for preventive maintenance and replacement.
- We compared records of the mileage traveled per vehicle to records of oil changes performed during the audit period and tested to determine whether CCRTA followed specific vehicles' manufacturer guidelines and the required FTA preventive maintenance guidelines.
- We extracted from Ez Bus a fleet inventory list and maintenance records. We used original maintenance work orders, as well as copies, as evidence to verify the information in the Ez Bus-generated report. We reviewed a nonstatistical random sample of 10 of the 77 work orders for non-revenue-producing vehicles, which we compared to the data in Ez Bus. We used nonstatistical sampling and therefore did not project our results to the population.
- We reviewed a statistical sample of 30 out of 5,188 work orders for revenue-producing vehicles, using a 95% confidence level and a 10% tolerable error rate, which we compared to the data in Ez Bus. The Ez Bus database included 25 work orders that did not have specific revenue-producing or non-revenue-producing vehicles assigned to them. The audit team tested all 25 of the unassigned vehicle work orders; we compared them to the Ez Bus database and discussed them with management to gain an understanding of them. We verified attributes of the work orders pertaining to the maintenance work performed and maintenance costs.
- We asked CCRTA management about the use of non-revenue-producing vehicles and the process of lending a non-revenue-producing vehicle from the motor pool.
- We asked CCRTA management whether the keys to non-revenue-producing vehicles were in the possession of the general manager of Eastern MA Transit Company or CCRTA personnel or were left in the vehicles.
- We requested the sign-in/sign-out log for non-revenue-producing vehicles.
- We examined the state's publicly available, searchable website, as well as CCTRA's own website, to determine whether they included data for CCRTA expenditures, including payroll, to ensure transparency with regard to the agency's spending.

We analyzed Ez Bus data by performing validity and integrity tests, including testing for missing data and scanning for duplicate records. We performed a source documentation review of the original hardcopy work orders to determine whether they matched the information in Ez Bus. We determined that the data from this system were sufficiently reliable for the purposes of our audit.

DETAILED AUDIT FINDINGS WITH AUDITEE'S RESPONSE

1. The Cape Cod Regional Transit Authority did not submit required financial information to the Commonwealth to be made available to the public on a searchable website.

The Cape Cod Regional Transit Authority (CCRTA) did not submit required financial information about its operations (e.g., expenditures) to the Executive Office for Administration and Finance (EOAF) so this information could be made available to the public on a searchable website. Therefore, CCRTA did not allow the Commonwealth to give the public a sufficient level of transparency regarding CCRTA's operations, including its overall financial health and the nature and extent of its expenses.

Authoritative Guidance

Section 14C of Chapter 7 of the Massachusetts General Laws requires agencies, including quasi-public independent entities such as CCRTA, to report their "appropriations, expenditures, grants, subgrants, loans, purchase orders, infrastructure assistance and other forms of financial assistance" to the Secretary of EOAF for inclusion on the searchable website of the Office of the State Comptroller. Section 14C(e) states, "All agencies shall provide to the secretary all data that is required to be included in the searchable website not later than 30 days after the data becomes available to the agency."

Reasons for Noncompliance

In its response to our draft report, CCRTA senior management stated,

The RTAs as a group proposed a low cost alternative to their participation in this initiative, which involved publication of the financial data on the RTAs' individual websites. . . . Chapter 7, Section 14C under clause (g) contemplates and provides for the redirection of the public from the State's Open Checkbook website to other government websites as long as each of those websites complies with the requirements of this section.

Consequently, CCRTA stated, it believed the financial reporting on its website complied with the "spirit and transparency goal" of the transparency initiative. It also stated,

The CCRTA has made a concerted effort over the years to comply with the spirit and transparency goal of the Chapter 7, Section 14C "Open Checkbook (CTHRU)" initiative through the publication of its payroll and financial payment information, audited financial statements, and approved fiscal year budgets on its website in a searchable format. We believe the financial information currently contained on our website provides the public with a sufficient level of transparency regarding the CCRTA's operations, including its overall financial health and the

nature and extent of its expenses. As a matter of routine, we direct public requests for CCRTA's financial information to the Open Government section of our website, which in most instances satisfies the public's request for information. In those rare cases a request for information is not contained on our website, we treat it as a Public Information Request and quickly respond to the individual, generally at no cost. Interestingly, these types of specialized requests, in most instances, would not be available through the data information elements presently contained in the State's Open Checkbook (CTHRU) searchable format website.

Recommendations

1. CCRTA should develop formal policies and procedures for submitting this required information to EOAF.
2. CCRTA should establish monitoring controls to ensure that the staff members assigned to this task adhere to these policies and procedures.

Auditee's Response

In the future, the CCRTA plans on taking the necessary steps to report its financial information to the EOAF Secretary for inclusion on the Office of the State Comptroller's searchable website (i.e. "CTHRU"). Recent conversations with the State Comptroller's Office regarding the RTAs' participation in the "CTHRU" website have been very encouraging and early indications appear to provide for technical assistance help and ongoing maintenance costs at no expense to the RTAs. This latest development removes a major financial impediment to the CCRTA's full participation in the Commonwealth's "CTHRU" system and we look forward to working with the Comptroller's Office and other RTAs to achieve the goal of full financial reporting as envisioned under Chapter 7, Section 14c.

Auditor's Reply

Based on its response, CCRTA is taking measures to ensure that it reports this required information to EOAF.

2. CCRTA did not properly document the use of its non-revenue-producing vehicles by its employees.

CCRTA did not properly document the use of its non-revenue-producing vehicles. Specifically, it did not properly document information such as the name and driver's license expiration date of the employee who used the vehicle, the trip's intended destination and purpose, the date and time the vehicle was picked up, the date and time it was returned, its license plate number, its description, its beginning odometer reading, its condition before and after use, any damage, and any maintenance issues identified during use, for every trip for all of its non-revenue-producing vehicles. According to CCRTA records, its 10 non-revenue-producing vehicles were driven a combined total of 44,663 and 56,608 miles

during fiscal years 2016 and 2017, respectively. As a result of the lack of monitoring of use, there is a higher-than-acceptable risk that these vehicles may be used for non-business purposes without detection.

Authoritative Guidance

CCRTA's oversight agency, the Massachusetts Department of Transportation (MassDOT), has a Motor Vehicles Policy, No. P-D0032-01, dated October 5, 2016, regarding the use of MassDOT's non-revenue-producing vehicles by its staff. This policy requires MassDOT management to maintain a log that documents the name and driver's license expiration date of the employee who used the vehicle, the trip's intended destination and purpose, the date and time the vehicle was picked up, the date and time it was returned, its license plate number, its description, its beginning odometer reading, its condition before and after use, any damage, and any maintenance issues identified during use. Although CCRTA is not required to follow this policy, it represents a best practice in vehicle fleet management that CCRTA should follow because it will allow the agency to more effectively manage the maintenance and proper use of these vehicles.

Reasons for Noncompliance

CCRTA management stated that the agency had an informal policy, verbally communicated to all staff members, that required employees to request the use of non-revenue-producing vehicles from CCRTA's fleet director. They said they believed that the vehicles were adequately safeguarded from potential misuse because the fleet director was the only staff member who had the keys when employees asked to sign out the non-revenue-producing vehicles. CCRTA does not have policies and procedures in place for the use of its non-revenue-producing vehicles or the monitoring of that use.

Recommendations

1. CCRTA should establish policies and procedures, consistent with those established by MassDOT for its non-revenue-producing vehicles, that require a log that documents the following:
 - a. the name and driver's license expiration date of the employee who used the vehicle
 - b. the date and time the vehicle was picked up
 - c. the date and time the vehicle was returned
 - d. the vehicle's license plate number

- e. the vehicle description
 - f. the intended destination and purpose
 - g. the beginning odometer reading
 - h. the condition of the vehicle before and after use
 - i. any damage
 - j. any maintenance issues identified during use
2. CCRTA should ensure that these policies and procedures include monitoring controls to ensure that they are adhered to.

Auditee's Response

We had been monitoring the use of non-revenue vehicles in the following manner:

- *All non-revenue vehicles were assigned and used only as needed. Each vehicle's use was approved and authorized first by a manager for that use. Subsequently, the manager would check when the vehicle returned to ensure its use was only for the authorized purpose.*
- *Fuel, mileage and fluid levels of each non-revenue vehicle were logged at the time of fuel fill-ups and mileage compared to the amount of fuel dispensed into that vehicle. The amount of fuel dispensed needed to correlate with the amount of miles driven. Since the vehicles had always appeared to be within acceptable ranges, no further documentation appeared necessary. However, given the comprehensive discussions with your team around the necessity to better document these procedures, we have implemented a more rigorous oversight policy. . . .*
- *There are three outlier vehicles that are permanently assigned to individuals, rather than being shared for their use. They are:*
 - *Administrator's vehicle . . . (2012 Ford Escape)*
 - *Facilities Manager's vehicle . . . (2017 Ford F-250)*
 - *General Manager's vehicle . . . (2010 Ford Escape)*

For these vehicles, mileage and fuel used were documented at each fill-up. We had never seen a discrepancy with the amount of fuel consumed vis a vis the mileage accrued for that interval. Employees were aware that managers were involved in their use and monitoring. However, the new policy is well illustrated in the . . . form that is now required in all of the regular, nonrevenue vehicles.

Each vehicle will now contain a clipboard with a pad of "CCRTA NON-REVENUE VEHICLE LOG" forms that are specific to that particular vehicle. Each employee that is authorized to utilize the vehicle will be required by new policy to complete the log. A manager will also be required to thoroughly review each log and sign off on the documentation and use on a weekly basis.

Lastly, CCRTA has also assigned unit numbers to the vaulting trailer and electric yard carts for better documentation purposes.

Auditor's Reply

Although CCRTA may have had some procedures in place to monitor certain aspects of the use of its non-revenue-producing vehicles, we do not believe that these procedures provided adequate control over their use or ensured that the vehicles were only used for business purposes. However, based on its response, CCRTA is taking measures to address our concerns in this area.