

United States Department of Transportation, Office of the Secretary

Docket No. DOT-OST-2019-0165

Request for Comments on Non-Traditional and Emerging Transportation Technology (NETT) Council

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January 10, 2020

The following comments are in response to the notice in this docket published at 84 Federal Register 65214 et seq. (November 26, 2019) on matters relevant to the work of the Non-Traditional and Emerging Transportation Technology (NETT) Council, an internal body at the U.S. Department of Transportation (USDOT) that focuses on issues concerning new transportation technologies.

I work for a non-profit called the Greater Wisconsin Agency on Aging Resources, Inc. providing technical assistance to transportation programs in aging and social services agencies across Wisconsin. Many of these public agencies operate directly or contract with transportation services that include transit, volunteer drivers and demand response buses – what can be deemed traditional services. Sometimes, these public programs are the only transportation options available in that community or region and by nature of geography, long distance and low-density trips are expensive. These systems generally have limited resources and expertise so many of these programs operate with antiquated or no technology or automation.

It is commendable for the Department to recognize the importance of looking at and planning for emerging and non-traditional technologies in transportation that are here and evolving. In my role working with traditional transportation programs, my comments focus on the need to include traditional modes and systems in NETT Council discussions. The NETT Council should ensure jurisdictional and regulatory solutions are fairly applied across new and existing systems, that traditional services can have the opportunity to benefit from emerging technology and that unintended consequences of new regulation and policies to existing systems are considered and alleviated.

The unique needs for individualized transportation solutions challenges traditional and will challenge non-traditional transportation services and technologies. It is the hope that this Council will use available resources and brain power for innovations beyond urban and population dense areas to improve the provision of door through door service for someone with dementia, or a ride to the clinic for someone who uses a bariatric wheelchair they need assistance to move, or for a 60-mile, one-way ride to dialysis through areas without cell phone service.

We recognize that emerging technology in the transportation sector can have positive and life-changing impacts on individuals who do not drive. We have also experienced unintended consequences of new laws related to these emerging projects. For example, laws regulating Transportation Network Company operations impacted the ability of volunteer drivers, an essential component of Wisconsin's transportation system, to retain personal vehicle insurance. Policies on personal delivery devices and other wheeled personal transport options often compete with pedestrians on sidewalks and endanger pedestrian safety. Walking is the second highest used mode of transportation of older adults.

The potential to improve existing transportation options with new technology is exciting, however, existing modes, with their unique benefits as well as challenges and limitations, should be part of the discussions that happen in the NETT. While new and emerging modes can offer different options, there may still be an important role for traditional modes, especially if they have been modernized through the process.

Ensuring traditional transportation providers and consumers of those services are included in the NETT Council creates opportunities to improve existing services through the use of technology and address potential unintended consequences of emerging projects. Without the engagement of these voices, even with the latest innovation, we risk losing critical infrastructure and options for those who have no other options.

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