

TELEPHONE HOLD TIME IN ADA PARATRANSIT

THIS SERIES OF TOPIC GUIDES INCLUDES:

- 1 Equipment Maintenance
- 2 Stop Announcements and Route Identification
- 3 Eligibility for ADA Paratransit
- 4 Telephone Hold Time in ADA Paratransit
- 5 Origin To Destination Service in ADA Paratransit
- 6 On-Time Performance in ADA Paratransit
- 7 No-Shows in ADA Paratransit

A Series of
Topic Guides
for Transit
Agencies,
Riders, and
Advocates on
the Americans
with Disabilities
Act (ADA) and
Transportation

The series is available at <http://dredf.org/ADAtg>

TABLE OF CONTENTS

INTRODUCTION	4
BEST PRACTICES IN TELEPHONE HOLD TIMES	5
Best Method: Maximum Allowable Hold Times	6
Another Method: Hourly Average of Hold Times	6
Automatic Call Distribution (ACD) Systems	7
Transit Agencies Without ACD Systems	8
“Where’s My Ride” Calls	9
Secondary Holds	10
When Might Secondary Holds Be Necessary?	10
Checking Back With Caller Frequently	10
Tracking Secondary Hold Time	11
Best Practices For Reducing Secondary Holds	11
No Busy Signals	12
Don’t Necessitate Long Distance Charges	13
Abandoned Calls	13
Avoid Limits on the Number of Trip Requests per Call	13
WHAT ELSE RIDERS AND ADVOCATES NEED TO KNOW	14
The Rider’s Role	14
Enforcement of Your ADA Rights	14
Other Resources	16

(Table of Contents continues on next page)

Published June 2010

By the Disability Rights Education & Defense Fund (DREDF) and TranSystems Corporation¹

Funded by the Federal Transit Administration²

©2010 DREDF and TranSystems Corporation

Reproduction of this document is encouraged.

WHAT ELSE TRANSIT AGENCIES NEED TO KNOW	16
Customer Service	16
Subscription Service	17
Don't Misinterpret the 50% Cap	18
Responding to "Where's My Ride" Calls During Pickup Window	18
Telephone Messages and Callbacks	18
Communication Access	19
Staffing Issues	19
Call Recording Capabilities	20
Alternative Technologies	21
Customer-Friendly Call Options and Menus	21
Call Handling Procedures and Scripts	21
Complaint Investigation	22
GENERAL RESOURCES FROM FTA	22
ENDNOTES	23

INTRODUCTION

The Americans with Disabilities Act (ADA) does not permit transit agencies to have any capacity constraints in ADA paratransit.³ Capacity constraints are defined as any operational patterns or practices that significantly limit the availability of service to ADA paratransit eligible individuals.

Some of the prohibited capacity constraints are specifically listed in the U.S. Department of Transportation (DOT) ADA regulation, such as substantial numbers of significantly untimely pickups, substantial numbers of trip denials or missed trips, and substantial numbers of trips with excessive lengths. However, any other operational practices that significantly limit the availability of the service are also capacity constraints, and are illegal. One important example is when riders must wait on the telephone for unduly long periods of time to arrange rides.

The Federal Transit Administration (FTA) ADA compliance reviews have confirmed concerns expressed by the National Council on Disability that long telephone holds are a widespread problem.⁴ Because of shortages of staff or telephone capacity in some transit systems, many callers experience long telephone hold times. Related problems include situations in which callers hear a telephone network message that “all circuits are busy,” or they are put on hold and subsequently disconnected.

This Topic Guide on Telephone Hold Time in ADA Paratransit⁵ first addresses the ADA requirements and best operational practices for avoiding long telephone hold times and related telephone practices that constrain ADA paratransit capacity. A subsequent section discusses additional information riders and advocates need to know, including the rider’s role in reducing telephone hold times. The final sections address other operational practices that transit agencies need to know, including how to avoid misinterpreting the 50% subscription service cap and other practices that can affect telephone hold time, and general resources from FTA.

The Topic Guide Series on ADA Transportation is for transit agencies, public transit riders, and disability advocates. The Topic Guides bring together the requirements of the ADA and the DOT ADA regulation, FTA determinations, and best operational practices on each topic. The Federal Transit Administration enforces the ADA in the area of publicly funded transit. Readers who wish to understand the most authoritative and up-to-date interpretations of the ADA transportation requirements may wish to check both the text and endnotes of this Topic Guide to find specific FTA determinations on particular paratransit telephone hold issues.

The determinations FTA makes in its ADA compliance reviews indicate key transit agency requirements and responsibilities that are important for transit agencies to implement. In each ADA compliance review, FTA *Findings* are the basis for corrective actions by the transit agency. FTA *Recommendations* identify one possible way to address the Findings. Many of the

reviewed agencies have implemented service improvements since the time of their reviews. The FTA ADA compliance reviews may be found in full at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html, or go to www.fta.dot.gov/ada and select FTA ADA Compliance / ADA Compliance Review Final Reports.

The Topic Guide series on ADA Transportation also draws information from many other sources, including DOT Disability Law Guidance; FTA ADA Letters of Finding and Bulletins; Transportation Research Board and National Council on Disability publications; National Transit Institute courses; Easter Seals Project ACTION publications and Distance Learning Sessions; American Public Transportation Association draft Recommended Practices; and the recommendations of nationally recognized ADA paratransit operators, planners, and researchers on the best operational practices for implementing ADA requirements.

BEST PRACTICES IN TELEPHONE HOLD TIMES⁶

FTA has stated that a transit agency “must design and implement its system to ... achieve minimal telephone wait times.”⁷

There are two basic methods to measure and monitor ADA paratransit telephone hold times. The best way is to establish standards for the **maximum allowable hold time**, and then to measure each caller’s hold time, comparing the times to the established standards for maximum allowable time.

Some transit agencies do not have the technology necessary to measure hold times using the maximum allowable hold time approach. In that situation only, the transit agency will need to measure the **hourly average** of its hold times.

Measuring hold times by their maximum length is superior to measuring the hourly average.

Measuring hold times by the maximum allowable time is superior to measuring the hourly average because the maximums approach is more straightforward—both simpler to calculate and more transparent. For this reason, measuring by maximums is the method strongly preferred by FTA.⁸

Both methods require an Automatic Call Distribution (ACD) system [also see *Automatic Call Distribution (ACD) Systems* below, page 7]. For transit systems without ACD, telephone hold times need to be monitored using other approaches.

All of these methods are described below.

Regardless of the method used, FTA has made it clear that establishing standards⁹ for, and thoroughly monitoring,¹⁰ telephone hold times are key elements of ADA compliance. This is true for both reservations calls and for dispatch (also called “Where’s My Ride”) calls. [Also see “Where’s My Ride” Calls below, page 9.]

BEST METHOD: MAXIMUM ALLOWABLE HOLD TIMES

A good practice, using the maximum allowable hold time method, would be a standard that 95 percent of calls should be answered within three minutes, and 99 percent of calls should be answered within five minutes.¹¹

A good standard is 95% of calls answered in three minutes, and 99% in five minutes.

Here is an example of how a transit agency might apply this standard, measuring by maximum allowable hold times. Telephone reports typically list how many calls are received each day, each week, and each month, as well as what percent of the calls are answered within specified time increments (for example, 60 seconds, 120 seconds, 180 seconds, and so forth). The reports should list the percentage of calls answered by one-minute increments up to six or seven minutes. If there were 10,000 calls last month, how many were answered within three minutes? It should be at least 95 percent, or 9,500 calls. How many were answered within five minutes? It should be at least 99 percent, or 9,900 calls.

When measuring maximum hold time, looking at hourly information is helpful for determining how to address problems. For example, if a transit agency finds that six percent of the maximums are over three minutes, it would want to know when these occurred so that it could adjust staffing accordingly.

Every call group should be subject to this standard, but each call group should be analyzed separately. For example, reservation calls should be measured separately from “Where’s My Ride” calls.

ANOTHER METHOD: HOURLY AVERAGE OF HOLD TIMES

If transit agencies don’t have adequate technology to measure maximum allowable hold times, they may need to consider a less preferred method: measuring the hourly average hold time.

Average hold time should be calculated **for each hour of the day when calls are taken from riders on that telephone line.**¹² Averages need to be hourly, at most—it is not useful to average hold times over an entire day, or over any other period longer than an hour. Longer periods of time for measuring averages (such as daily, weekly, or monthly averages) allow periods of significantly longer hold times to be obscured by the process of averaging in the periods with shorter hold times. Thus, hourly averaging is necessary for transparency—in order to determine what hold times are actually occurring during various parts of the day. While hourly averaging is a good practice, some transit agencies use an even shorter time period, averaging by the half hour, which is a best practice.

A good practice for hourly averaging is a standard that 95 percent of the hourly periods should have an average hold time of no more than one minute, and 99 percent of the hourly periods should have an average hold time of no more than two minutes.¹³

Here is an example of how a transit agency might apply this standard, measuring by hourly average hold time. An average hold time should be calculated for each hour when calls are taken from riders on that particular line. For example, suppose that between 9 a.m. and 10 a.m. on a particular day, the average is 45 seconds. If the telephone line is open for 10 hours a day, for 31 days in one particular month, $10 \text{ hours} \times 31 \text{ days} = 310$ hourly averages. At least 95 percent of those hourly averages should be no more than one minute. $95 \text{ percent of } 310 = 295$, so at least 295 of the hourly averages should be one minute or less. And at least 99 percent of the hourly averages (307 of the 310) should be two minutes or less.

Every call group should be subject to this standard, but each call group should be analyzed separately. In other words, reservation calls should be measured separately from “Where’s My Ride” calls.

If a transit agency measures hold times only by averaging, it may be helpful to also conduct random sampling of maximum hold times. Make test calls during the hours with the longest average hold times, and record the actual time on hold. This can provide more accurate information about the hold times being experienced by callers.

AUTOMATIC CALL DISTRIBUTION (ACD) SYSTEMS

To implement the *maximum allowable hold time* or, if that is not possible, the *hourly average hold time* methods, a transit agency must have:

- An automatic call distribution (ACD) system. Without ACD, calls don’t go into a queue in which hold times can be measured. Many mid-sized and large transit agencies have this technology.

- An agreement with its telephone service provider to set up and generate customized reports. The telephone service provider will offer reporting capability and the contract should give the transit agency the capability to generate these reports. The telephone service provider will ask what increments should be set up and what the reports should show. The reports should be tailored to be consistent with the standards the transit agency has adopted, and should provide information that enables the transit system to determine if the standards are being met.

Example for measuring MAXIMUM hold time: A typical report set-up should report time increments for every 60 seconds until at least seven minutes.

Example for measuring AVERAGE hold time: A typical report set-up should capture the average of the hold times for each hourly period.

If a transit agency buys an ACD system, it should measure maximum hold time.

If a transit agency is deciding which ACD system to buy, it should select one that has the capability of measuring maximum hold times. Also, some systems can measure any increment of time, from 15 seconds up to any larger amount—this capability is preferred. The system purchased should also be capable of showing call volume and hold times for each hour or half-hour of the day. Hourly information is important for staff planning.¹⁴

It is a best practice for an ACD system to include a queue-positioning feature that lets callers know where they are in the queue. For example, a recording would inform callers “Your call will be answered in two minutes.”

TRANSIT AGENCIES WITHOUT ACD SYSTEMS

Small agencies and those without ACD must monitor in other ways.

Smaller transit agencies and those without ACD technology may have a main number and a few roll-over numbers; lights flash and staff persons pick up the telephone. These transit

agencies must monitor telephone hold time in other ways, including:

- Random visits to locations where calls are taken
- Random, statistically significant sampling throughout the days and hours of telephone operation at each location where calls are taken

If an ACD system is not used, it is important to limit the maximum number of calls that any one reservationist or dispatcher will handle at a time. Typically, each workstation might have a main line and one or two extensions that will enable employees to put one or two calls on hold while they handle another call. Problems can occur if there is more than one main line and two extensions, or more than one active call and two on hold at any given time.

If employees are handling more than one call at a time, they should check frequently with any callers who are on hold—at least once every minute—to let them know that they will be assisting them shortly.

“Where’s My Ride” calls should have the shortest hold times.

“WHERE’S MY RIDE” CALLS

The telephone hold times for calls to dispatch (also termed “Where’s My Ride”, “late ride”, “ride check”, and “ride status”) are just as important as reservation hold times, if not more so. These hold times should be limited to, at most, the same standards as are reservation calls [also see *Best Method: Maximum Allowable Hold Times*, p. 6 above and *Another Method: Hourly Average of Hold Times*, p. 6 above].

It is a best practice for these calls to have the shortest hold times. Riders making these calls cannot wait for lengthy periods while they are attempting to obtain updates on pickup information. Callers have no control over when to make the call, and may be calling from a doctor’s office telephone or similarly inconvenient situation. They are often at risk of missing the vehicle by making the call. Thus, another reason to keep these hold times to a minimum is to avoid the riders being considered no-shows because they are inside on hold. More detailed information on *No-Shows in ADA Paratransit*, which is the subject of another Topic Guide, is available at <http://dredf.org/ADAtg>.

FTA has clearly indicated its concern with hold times in dispatch in numerous ADA compliance reviews.¹⁵ [Also see *Customer Service* below, page 16.]

If there are any secondary holds during “Where’s My Ride” calls, a staff person should check with the caller frequently—at least once every minute—to let him or her know the question is still being addressed, because callers are often waiting for a vehicle and/or calling from an inconvenient situation. [Also see *Secondary Holds* below, p. 10.]

SECONDARY HOLDS

A secondary hold is when a call is answered, then subsequently placed on hold. Secondary holds should be avoided whenever possible. When they are necessary, the length should be minimized as much as possible.

When Might Secondary Holds Be Necessary?

Secondary holds should generally be necessary only during “Where’s My Ride” calls, when the calls come to reservations, but the callers need information available only from the dispatch office, so the calls are internally transferred. Or, if these calls go directly to dispatch, secondary holds may be necessary while dispatchers contact drivers for updates on pickups. A good rule of thumb is that secondary holds involving a dispatcher are acceptable if the dispatcher is still working on the caller’s questions during the entirety of the hold time.

Reservations calls should generally not include secondary holds, with a few exceptions of short duration. For example, on occasion during the trip booking process, a reservationist may need assistance from a supervisor. Another exception may be occasional instances in small transit agencies that are not using ACD telephone systems.

A staff person should check back with the caller at least once every minute.

Checking Back With Caller Frequently

A staff person should check with the caller frequently—at least once every minute—to let him or her know the question is still being addressed, because callers are often waiting for a vehicle and/or calling from an inconvenient situation [also see “Where’s My Ride” Calls above, page 9].

Tracking Secondary Hold Time

Some telephone systems cannot track the hold time for these internal transfers. However, new technology can measure secondary holds. If secondary holds cannot be measured with the technology available to a particular transit agency, the agency should still use other methods to monitor secondary holds closely to ensure they do not pose a problem. Other methods may include a random review of recorded calls, random visits to locations where calls are taken, or a transit agency representative making calls. The transit agency may wish to use a third party to make these calls, rather than having a transit staff person make the calls, because most systems have caller ID.

New technology can measure secondary holds.

Secondary holds should never be included in measurements of initial hold time, but rather, should be measured separately.

Secondary holds should never be used to distort initial hold time.¹⁶ This can happen if, for example, call takers routinely answer calls quickly, but then place callers on long secondary holds while conducting other business. This is a poor practice that is not consistent with the ADA.

Best Practices For Reducing Secondary Holds

A best practice for minimizing secondary holds for “Where’s My Ride” calls is to ensure there is an adequate number of dispatchers to handle these requests.¹⁷ Sometimes, there might be enough reservationists to take these calls initially, but then a smaller number of dispatchers to handle the calls when transferred from multiple reservationists. It is important to avoid creating a bottleneck in the system by having too few dispatchers to adequately handle all the calls directed to them.

Another best practice to reduce “Where’s My Ride” secondary holds is to install advanced technology that enables reservationists or other operations staff (for example, dispatch assistants) to handle most inquiries. If vehicles are equipped with Automatic Vehicle Locator (AVL) and Mobile Data Terminals (MDT), the location and status of each vehicle can be recorded and displayed in the system. Reservationists or dispatch assistants can be trained to check on the status of runs, and inform callers of the status of their scheduled pickups. In transit systems with these technologies, many “Where’s My Ride” calls can be handled by

reservationists or dispatch assistants. A dispatcher's involvement is necessary only when the status of a run and its upcoming pickups is not clear.

NO BUSY SIGNALS

There should be no busy signals. FTA has stated that a transit agency "must design and implement its system to avoid busy signals and achieve minimal telephone wait times."¹⁸ To avoid busy signals, transit agencies should have adequate incoming call capacity to handle the highest expected call volumes throughout the operating day.

There should be no busy signals.

FTA also found that if a transit agency has no means for monitoring busy signals, it cannot demonstrate its compliance with the ADA requirement to provide telephone access sufficient to meet paratransit demand.¹⁹ Business telephone lines may obtain a "busy report" from the telephone company that can be ordered in advance to monitor and count busy signals.

In addition, most ACD systems can track when all telephone lines are being used. Even though they cannot detect when additional callers receive busy signals—that information must be obtained from the telephone company by advance request—it is still important for transit agencies with ACD systems to utilize the systems' capability to track if there are periods of time when all lines are simultaneously occupied. This is sometimes called a "Trunk Busy" report. If there are such periods, more lines should be added.

Transit agencies without ACD may have one or more incoming telephone numbers that roll over to several extensions. These agencies can monitor whether, and how often, all extensions are occupied.

All these tools should be utilized to ensure that callers don't receive busy signals when trying to reach the ADA paratransit service. In addition, transit agencies should still periodically obtain busy reports from the telephone company, particularly for peak call times of day.

Other telephone practices that, like busy signals, result in the unavailability of telephone service when it should be available are also incompatible with the ADA. For example, an FTA ADA compliance review found that "any calls left in the queue at the end of the day were abandoned. As a result, some customers calling before 4:30 p.m. are not being served."²⁰

DON'T NECESSITATE LONG DISTANCE CHARGES

Calls made within the service area to the paratransit reservation and dispatch telephone lines should not require the caller to pay long distance toll charges. This local telephone number should be properly advertised.²¹

ABANDONED CALLS

Transit agencies should monitor the number and percentage of abandoned calls—when the caller hangs up before being served. A high percentage of abandoned calls can indicate problems.²² It might indicate that hold times are too long and that riders' access to making trips reservations has been frustrated. It might also indicate that riders are not getting through to the extensions they want. For example, the various call options (such as "Press one to schedule a ride; press two to check on the status of a ride, press three to cancel a ride," and so forth) might be too complex or confusing to some riders. [Also see *Customer-Friendly Call Options and Menus* below, page 21.]

Most ACD telephone systems can track and report abandoned calls. If these reports show a high rate of abandoned calls, a review of the telephone set-up and discussions with riders about telephone issues and experiences is recommended.

While callers are on hold, telephone systems should use music, informational messages, or some other indication that the call is still in queue. Hearing only silence could cause callers to abandon their calls.²³

Avoid limits on the number of trip requests per call.

AVOID LIMITS ON THE NUMBER OF TRIP REQUESTS PER CALL

Some transit agencies have placed limitations on the number of trips a caller may arrange on a single telephone call. However, such limits can increase hold times due to the need for repeated customer calls, according to an FTA ADA compliance review.²⁴ Such policies also pose added burdens on riders. For these reasons, it is not a best practice. While such a limitation may seem like a good way to limit the time a call taker must spend with each caller, it appears to have consequences that outweigh any benefit.

WHAT ELSE RIDERS AND ADVOCATES NEED TO KNOW

THE RIDER'S ROLE

Riders can assist a transit agency to reduce telephone hold times.

Call During Off-Peak Times, When Possible. Sometimes there may be known times when call volumes are the highest and hold times are the longest. This is sometimes the first thing in the morning, when the telephone lines first open, or the last hour of the day, when riders are calling to make last-minute trip requests. Riders can help by calling during less busy times, when possible.

Check on Rides Only When They Are Actually Late. If the service has an on-time window, also termed a pickup window or “be ready” time—that is, a period of time during which vehicles are considered to be arriving on time—it is helpful to wait until this full period has passed before calling to check on a ride. For example, a system might have a pickup window that starts at the scheduled pickup time and goes until 30 minutes after the scheduled time (a 0/+30 window). It is helpful for riders to remember that the vehicle is not late until after this period, and to refrain from calling until the 30-minute window has elapsed. Calling during the pickup window, when the pickup is not really late, increases the burden on dispatchers and can cause longer hold times for other riders whose vehicles may be truly late.

Riders, advocates, and transit agencies should all work to ensure that the best practices to attain appropriate ADA paratransit telephone hold times (many of which are described in this Topic Guide) are implemented. Riders are an important source of information about service quality. And as the National Council on Disability showed, disability advocates can play an important role in improving the performance of their transit agencies.²⁵

ENFORCEMENT OF YOUR ADA RIGHTS

If you think your transit agency is not in compliance with the ADA, there are several avenues available for enforcement. You may pursue them in any order; you are not required to use them in the order listed below.

1. File a local complaint

You can file a complaint with your local transit agency and/or otherwise communicate with local agency staff. Transit agencies are required to have procedures to receive, resolve, maintain records of, and report on complaints.²⁶ It is best to file the complaint quickly, as soon as possible after the problem, and keep a copy of it. Include as many details as possible (who, what, when, where, and so on). Find the transit agency Customer Service department or ADA Coordinator to learn how to submit the complaint. Transit agencies usually have one or more

of the following options for filing complaints: by e-mail, through their websites, by telephone, and/or by postal mail. If the issue remains unresolved after allowing a reasonable amount of time for a response, you can file a complaint with the Federal Transit Administration in Washington D.C. and show your local complaint records [also see *File an ADA complaint in Washington D.C.* below, page 15].

2. Engage in local advocacy

You can also engage in a variety of efforts to advocate for changes by your local transit agency.

You may be able to obtain assistance from local, state, and national disability rights organizations, including:

- Your state's Protection and Advocacy agency, which you can find by going to <http://ndrn.org> and scrolling down to the "Get help in your state" section, or by calling 202/408-9514 (or by TTY, 202/408-9521).
- Your local Center for Independent Living (CIL), which you can find by going to www.ilru.org/html/publications/directory/index.html or calling 713/520-0232 (Voice/TTY). You can also find CILs by going to www.ncil.org/directory.html.

In some cities, the disability community and the transit agency have succeeded in building a collaborative relationship in which they work together to improve transit service for people with disabilities.

3. File an ADA complaint in Washington, D.C.

You can file a complaint with the Office of Civil Rights of the Federal Transit Administration (FTA) in Washington, D.C., by:

- Filling out and sending the Rider Complaint Form at www.fta.dot.gov/civilrights/ada/civil_rights_3889.html
- Going to the FTA ADA website at www.fta.dot.gov/ada and selecting ADA Technical Assistance / File an ADA Complaint with the FTA
- Sending a complete letter to:

Director
FTA Office of Civil Rights
East Building – 5th Floor, TCR
1200 New Jersey Ave. SE
Washington, D.C. 20590

Include as many details as possible (who, what, when, where, and so forth), including a record of ongoing ADA violations you believe have occurred. As the FTA Office of Civil Rights states on the Rider Complaint Form:

You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.²⁷

4. File a lawsuit

The other method of enforcing the ADA is to file a lawsuit.

OTHER RESOURCES

You will find many other resources on the FTA ADA website at www.fta.dot.gov/ada. You may also contact the FTA Office of Civil Rights by e-mail at FTA.ADAAssistance@dot.gov or by telephone at 202/366-4018 or 888/446-4511 (or by TTY at 800/877-8339).

In addition to providing technical assistance via telephone and e-mail, the FTA Office of Civil Rights conducts ADA compliance reviews of several transit agencies every year. These are posted on the FTA ADA website at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Additional resources may be available from a variety of local, state, and national disability rights organizations.

WHAT ELSE TRANSIT AGENCIES NEED TO KNOW

CUSTOMER SERVICE

On May 15, 2009, the American Public Transportation Association (APTA), a national trade association for bus, paratransit, and rail transit agencies, published a draft Recommended Practice for public comment addressing “Where’s My Ride” calls. The APTA draft described best practices in customer service for this type of call:

Passengers who call the “Where’s my ride?” line deserve professional, courteous and honest information provided in a patient manner. Accurate details of a vehicle’s estimated time of arrival provided with empathy set the tone for a good customer service experience. Passengers want their calls answered quickly. Upon answering, an agent should give his or her name and department

and ask, “How can I be of assistance?” An apology should be readily offered when appropriate.

Callers want to know the most recent known location of the vehicle, the number of other stops before the caller will be picked up, the estimated time of arrival, the vehicle number, and any other identifying information, such as vehicle type and any identifying name on the vehicle. They do not want to be placated with a stock answer such as, “It will be 10 minutes” or “Your driver is around the corner.” It is preferable to give an updated estimated time of arrival and to confirm the exact location where the passenger will be waiting. Agents should then ensure that the information is received by the driver.

Don’t give callers a stock answer like “Your driver is around the corner.”

The agent should obtain a contact number, if available. If a delay will require rescheduling or conditions are uncertain, the agent should tell the passenger how much time will be required to resolve the problem and give him or her the option to call back at a specified time, to wait on hold, or to be called back. Agents should ensure that follow-up calls are made. ... Agents should apologize for the inconvenience and, when appropriate, offer a free ride coupon for the inconvenience. If applicable, an agent should reassure a caller that he or she will not be penalized with a “no-show” and update the passenger’s record.

Rapid resolution of “Where’s my ride?” calls is a priority. Speed of resolution is measured by total call time, since the calls often involve either the use of personal cell phone minutes or tying up a business phone in a reception area.²⁸

SUBSCRIPTION SERVICE

The provision of subscription service for repeat trips can be beneficial to riders as well as to transit agencies. One key benefit is reducing telephone call volume.²⁹ If subscription service is not provided, many riders are forced to book multiple trips on a single call—for example, a week of trips at a time. These multiple trip calls have very long servicing times, can keep agents busy for long periods, and can lead to long hold times. Where appropriate, providing subscription service eliminates the need for riders to call every day or every week.

Don't Misinterpret the 50% Cap

Many transit agencies have misinterpreted the DOT ADA regulation as capping subscription service at 50% of paratransit capacity, regardless of the circumstances. The cap only applies when there is no non-subscription capacity; that is, when there are capacity constraints.³⁰ Transit agencies with no trip denials may provide as much subscription service as they wish.³¹

Transit agencies with no denials may provide as much subscription service as they wish.

Thus, many transit agencies have unnecessarily limited subscription service and may increase how much they provide. Such an increase can reduce telephone call volume, as well as offering significant benefits for riders.

RESPONDING TO "WHERE'S MY RIDE" CALLS DURING PICKUP WINDOW

Some transit agencies will not respond to "Where's My Ride" calls during the rider's pickup window. Such policies are established in response to an underlying problem, which is that some riders do not understand the pickup window, and call repeatedly if their ride isn't there at the agreed-upon pickup time. Because this can be burdensome on dispatchers, some transit agencies may not take "Where's My Ride" calls until the pickup window is over. [Also see the Topic Guide on *On-Time Performance in ADA Paratransit*, which includes *On-Time Pickups and the Pickup Window*, and which is available at <http://dredf.org/ADAtg>.]

However, public education may be a better approach, because some of the queries are important and merit a response, even during the pickup window. For example, sometimes a visually impaired rider may have difficulties making the connection with the ride, even after it has arrived. Or there may be confusion about the correct waiting location for the vehicle. Responding to these calls can avoid missed connections and missed trips, which are expensive for a transit system. [Also see the Topic Guide on *Origin to Destination Service in ADA Paratransit*, which is available at <http://dredf.org/ADAtg>.]

TELEPHONE MESSAGES AND CALLBACKS

Some transit agencies take telephone messages and make callbacks to avoid long hold times or for other reasons. This practice is not acceptable for a "Where's My Ride" line; riders need to check on "Where's My Ride" issues at the time they are calling. On a reservation line, telephone messages and callbacks are acceptable, according to the DOT ADA regulation

Appendix D, which provides interpretive guidance on the regulation.³² If callbacks are used, the trips should be booked based on the times requested in the messages, and return calls should be made to confirm the final scheduled times. If riders cannot be reached with return confirmation calls, the exact times requested should become the scheduled times. However, relying on telephone messages and callbacks is not a best practice, because riders legitimately want to know that their trip request has been received and confirmed by the transit agency. If transit agencies rely on telephone messages and callbacks in large numbers, it is a poor practice, because it is time-consuming and increases the potential for miscommunication.³³

If riders cannot be reached, the time requested should be the scheduled time.

COMMUNICATION ACCESS

It is important for call takers to understand how to provide equal communication accessibility to people with speech impairments placing voice calls, and to people with speech and hearing impairments who place their calls on a TTY or through a TTY relay service.

Telecommunications equipment should be maintained in working order.³⁴ Staff should be trained to use both TTYs and the relay service, both of which lengthen calls. Also, staff needs to understand that riders who use communications devices may be difficult to hear on a speakerphone.

Some transit agencies have developed best practices for aiding callers with speech impairments. For example, having separate files listing riders' frequently taken trips can make it possible for callers to say a single word, and call takers can confirm where they are going. Or call takers can go down the riders' frequently taken trips list. It is easier to ask yes/no questions than to ask the caller to spell the destination. Staff should be trained in all these telephone techniques.

STAFFING ISSUES

Staffing for each telephone line, at all times throughout the operating day, is a key to providing and maintaining good telephone service. The number of reservationists on duty throughout the day should match, as much as possible, the expected call volume at various times of the day.³⁵ Staffing should also consider scheduled and unscheduled absences to ensure that staff numbers are adequate even if some agents are on leave or call in sick.³⁶

The number of dispatchers should be sufficient to respond to calls about the status of pickups (also called “Where’s My Ride,” “late ride,” “ride check,” or “ride status” calls). Consideration should also be given to having dispatch assistants handle routine trip status calls, or training reservationists to be able to perform simple checks on the status of a ride.

There should be enough dispatchers to respond to “Where’s My Ride” calls.

Some transit agencies have expressed the concern that attaining an appropriate hold time during the peak traffic hours requires too many part-time staff for optimum functioning. However, while it is true that transit agency call centers with a large portion of part-time staff can have difficulties, it is not a good practice to sacrifice appropriate hold times simply in order to preserve a full-time work force. There are a variety of other solutions. Ordinarily, there should be enough staff to cover the extra calls. If not, part-timers with adequate experience may be available. If experienced part-timers are not available, some transit agencies stagger their shifts, just as transit agencies do with vehicle pull-outs, or have supervisors or middle management take calls during one hour of the day. So if hold times are beginning to exceed transit agency standards for one or two hours in the day, staffing should respond.

Transit systems should also consider cross-training to enable available staff in other areas of operations to assist with covering the extra calls as needed.³⁷ For example, data entry staff might also be trained to handle trip reservations and might be asked to assist during peak call times. Or reservationists might be cross-trained to handle both trip bookings and “Where’s My Ride” calls, in order to switch between these call groups depending on the call volumes and hold times in each group.

Paratransit managers should continuously check and stay aware of the hold times in each call group. They should then make internal adjustments in agent assignments, depending upon where the staffing is needed.

CALL RECORDING CAPABILITIES

It is desirable to have a telephone system with the capacity to record and play back calls to and from riders upon request. State-of-the-art systems record calls digitally and allow sorting and reviewing of calls by day, workstation, and incoming or dialed number. Recorded calls can help in monitoring employee performance. They can also be a valuable source of information for investigating rider comments and complaints.

ALTERNATIVE TECHNOLOGIES

Some transit agencies currently use alternative technologies that can reduce the number of callers and/or their telephone hold times, and offer added benefits to callers. For example, some automated telephone systems and websites enable callers to confirm reservations, see where a vehicle is, and/or cancel the ride, through use of a confirmation number. Some enable on-line booking and booking rides via an Interactive Voice Response (IVR) telephone system. Smaller transit agencies without IVR and other advanced technologies can still offer similar functions through simple websites and e-mail. Some transit agencies now accept ride requests via fax, both from riders and from social service agencies that do booking for multiple riders.

Transit agencies are encouraged to develop these technologies. For example, transit systems with Automatic Vehicle Locator (AVL) technology and IVR may be able to make real time vehicle location data available by computer, cell phone, or personal digital assistant (PDA).

Transit agencies should be thorough and careful in their introduction of new technologies. These alternatives should be designed and implemented with rider input and should be thoroughly tested before going live.

CUSTOMER-FRIENDLY CALL OPTIONS AND MENUS

It is a best practice to keep call options and menus clear, understandable, and to a minimum. Multiple menus or an excessive number of telephone menu options can be confusing to riders and can result in calls going to incorrect locations within the operation. Work with riders to develop call menus and options that meet operational needs, but that are still clear and understandable.³⁸

CALL HANDLING PROCEDURES AND SCRIPTS

It is a best practice to develop call handling procedures and scripts that serve as the basis of staff training and are readily available to all who handle calls from riders.³⁹ Call handling procedures should address issues such as frequently checking in with callers if they are placed on hold, and putting one's telephone on "unattended status" if away from a workstation, so calls won't continue to be sent to that workstation. Scripts should provide step-by-step instructions for handling each type of call and situation.

Scripts in other languages may need to be considered for compliance with the transit agency Title VI plan. Some plans call for non-English accommodations, depending on the percentage and density of populations in the area. Information about Title VI, Limited English Proficiency (LEP), and related requirements is available at www.dotcr.ost.dot.gov/asp/lep.asp#LEP%20Guidance.

System managers should monitor calls periodically to ensure that procedures and scripts are being followed. Re-training should be provided as needed.

[For more on call handling procedures and scripts, see the Topic Guide on *On-Time Performance in ADA Paratransit*, which includes *Reinforce the Pickup Window* and *Reservations*, and which is available at <http://dredf.org/ADAatg>.]

COMPLAINT INVESTIGATION

The thorough investigation of all complaints related to the use of ADA paratransit service is an important part of monitoring and compliance. Transit agencies should ensure that all rider complaints are recorded and investigated. Transit agencies are required to have procedures to receive, resolve, maintain records of, and report on complaints.⁴⁰

Thorough complaint investigation is an important part of ADA compliance.

Transit agencies should provide timely responses to riders with information about the outcome of investigations. Transit systems should then use information obtained from investigations to address any performance issues and improve service, as an integral part of their ADA compliance effort.

GENERAL RESOURCES FROM FTA

Many ADA resources are available on the website of the Office of Civil Rights of the Federal Transit Administration at www.fta.dot.gov/ada. The FTA Office of Civil Rights may be contacted by e-mail at FTA.ADAAssistance@dot.gov or by telephone at 202/366-4018 or 888/446-4511 (or by TTY, 800/877-8339).

ENDNOTES

- 1 The authors of the Topic Guide Series on ADA Transportation are Marilyn Golden, Policy Analyst, Disability Rights Education & Defense Fund (DREDF) and Russell Thatcher, Senior Transportation Planner, TranSystems Corporation.

We wish to acknowledge our Advisory Committee and the additional people who reviewed the Topic Guide series. The Advisory Committee includes Linda Deavens, Director, Paratransit, Inc., Sacramento, California; Susan Gallagher, Manager of Accessible Services, San Francisco Bay Area Rapid Transit District, Oakland, California; Bonnie Hitch, Customer Service Manager, DART First State/Delaware Transit Corporation, Dover, Delaware; Kevin Irvine, formerly Senior Advocate, Equip for Equality, Chicago, Illinois; Toby Olson, Executive Secretary, Washington State Governor's Committee on Disability Issues and Employment, Olympia, Washington; and Nancy Pineles, Managing Attorney, Maryland Disability Law Center, Baltimore, Maryland.

The Topic Guide series was also reviewed, in whole or in part, by Doug Douglas, Vice President, Paratransit Services and Tammy Haenftling, Assistant Vice President, Paratransit Management Services, Dallas Area Rapid Transit (DART), Dallas, Texas; Karen Hoesch, Executive Director, Access Transportation System, Pittsburgh, Pennsylvania; Richard Weiner, Principal, Nelson\Nygaard Consulting Associates, San Francisco, California; and Stacy Zwagers, Program Manager, Access to Independence, San Diego, California.

The authors also extend appreciation to DREDF staff Ann McDonald-Cacho, Dave Nold, Julia Epstein, Linda D. Kilb, and Katie Keil.

- 2 This report was funded through a cooperative agreement between the Disability Rights Education & Defense Fund (DREDF) and the Federal Transit Administration (FTA), U.S. Department of Transportation. The views and policies expressed herein do not necessarily represent the views or policies of the Federal Transit Administration. The United States government assumes no liability for the contents or use of this report.
- 3 The Americans with Disabilities Act (ADA) at 42 U.S.C. § 12143(c)(3), available at www.dotcr.ost.dot.gov/Documents/ycr/ADA1990.htm, and the Department of Transportation (DOT) ADA regulation at 49 C.F.R. § 37.131 and 49 C.F.R. Part 37, App. D, § 37.131, available at www.fta.dot.gov/civilrights/ada/civil_rights_3906.html.
- 4 Many FTA ADA compliance reviews, including the nine quoted below, addressed overly long telephone hold times. The National Council on Disability reached a similar finding.

National Council on Disability, *The Current State of Transportation For People With Disabilities in the United States*, June 13, 2005, pp. 68 – 69.

Finding: “Phone performance prior to May 2002 appears to have been poor. Hold times of 10 to 20 minutes appear to have been common during peak calling periods. Lack of adequate staffing appears to have been a significant contributor to this poor performance.”

Recommendation: “MTA should consider establishing tighter telephone performance standards. A standard that defines a desired average hold time for any half-hour period of the day is recommended. The standard for this average hold time be significantly less than the 4 to 5 minutes allowed by current standards. The objective for meeting these standards should also be higher than the 85% now set for Call Group 11 (late calls).”

Federal Transit Administration ADA Compliance Review of Maryland Transit Administration (MTA), Baltimore, Maryland, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted June 17 – 21, 2002, Final Report dated January 16, 2003, p. 35, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: “Based on the telephone management system reports and comments by consumers, it appears the busy signal problem was resolved late in 2000. However, long hold times continue to be a problem, with callers having to wait upwards of 8 minutes during early morning and late afternoon hours.”

Recommendation: “It is recommended that Sun Metro carefully monitor telephone system reports compared to staffing levels and provide adequate staffing during busy call times (early mornings and late afternoons) to avoid long hold times.”

Recommendation: “It is recommended that Sun Metro set a goal for call hold times that will help to reduce the time passengers are currently kept on hold.”

Federal Transit Administration ADA Compliance Review of Sun Metro LIFT, El Paso, Texas, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted January 22 – 25, 2001, Final Report dated May 24, 2001, pp. 27 and 28, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "During the week of April 2, 2007, the DART reservations center received 4,194 calls. The two longest hourly average hold times during this period were 7 and 9 minutes. Average daily hold times ranged from 1 minute and 25 seconds to 3 minutes and 50 seconds, with a daily average of 2 minutes and 27 seconds. Twenty-three percent of calls during the week were answered in 2 minutes or less. Abandoned calls—calls terminated by the customer before they could be answered—were between 13 and 24 percent of daily calls for each day during that week. This high abandonment rate is an indicator of difficulty in getting through on the phone lines to make reservations at that time."

Recommendation: "DART should maintain the staffing levels of the reservations center used during the week of the on-site review (14 full-time and two part-time reservationists), and adjust as needed to avoid substantially long hold times for ADA eligible individuals who are making trip reservations."

Federal Transit Administration ADA Compliance Review of Delaware Transit Corporation, Dover, Delaware, *ADA Complementary Paratransit Service Compliance Review*, conducted May 15 – 18, 2007, Final Report dated August 29, 2008, pp. 42 and 43, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "Often the main reservations line appears to have excessively long hold times. A significant percentage of callers (33%) end up abandoning their calls because of the long hold times. The poor level of phone service that was observed and documented could be considered a constraint on the service that could deter customers from requesting trips and using the service."

Federal Transit Administration Compliance Review of Metropolitan Atlanta Rapid Transit Authority (MARTA), Atlanta, Georgia, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted September 10 – 14, 2001, Final Report dated March 19, 2002, pp. 25 – 26, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "During the period July 1, 2000, through January 31, 2001, approximately 19% of customers calling STS abandoned their phone calls. For one sample day, 98% of those who abandoned calls did so after waiting for more than 5 minutes. The long times required to complete a reservation could be considered an operational pattern or practice that significantly limits the availability of service to ADA eligible persons."

Recommendation: "It is recommended that MDTA review the staffing of its trip reservations operation with its contractor to assure that sufficient resources are provide to avoid substantial numbers of significant delays in calling to make trip reservations and take actions as necessary to reduce the number and length of customer hold times."

Federal Transit Administration ADA Compliance Review of Metro-Dade Transit Agency, Special Transportation Services, Miami, Florida, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted February 12 – 15, 2001, Final Report dated September 6, 2001, p. 22, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "Riders indicated that hold times can be long in the mornings. Review team observations indicated hold times of up to four minutes on the morning of Friday, February 9."

Recommendation: "COTA should redesign the current weekly telephone reports to show the percentage of calls answered within specific increments of time, up to three minutes—rather than only up to 50 seconds. Reports should also show hold times by day of week and hour of the day. Once these reports are prepared, COTA should review and adjust its staffing schedules for reservationists to address any days and times when holds are consistently long."

Federal Transit Administration ADA Compliance Review of Central Ohio Transit Authority (COTA), Columbus, Ohio, *ADA Complementary Paratransit Service Compliance Review*, conducted February 6 – 9, 2007, Final Report dated November 15, 2007, pp. 50 and 51, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "Telephone access appears to limit customers' ability to make trip requests. Hold times exceed 5 minutes for more than 14% of all calls to make trip reservation requests. With the exception of ASI operations monitoring, all of the call centers experienced average hold times that exceeded ASI's standard for eight or more consecutive hours. There appears to be a pattern of longer hold times in late afternoon."

Recommendation: "MTA and ASI should consider steps to increase the number of trips scheduled for each call in order to reduce call volumes and, as a result, reduce the amount of time customers are on hold and the number of abandoned calls. This might be accomplished in part by extending the time that trips can be requested to

the entire business day before the travel day, and by promoting customer use of Steady trips.

“The service plan adopted by the ASI Board of Directors in February 2003 provides for an increase in the number of trips requested during a phone call from four one-way trips to six one-way trips. The plan also provides for accepting reservations for next day service between 6:00 AM and 10:00 PM on the day before the trip. The plan also anticipates an increase in the number of standing order (Steady) trips as customers learn more about this service. These plan elements are scheduled for implementation on July 1, 2003.”

Recommendation: “MTA and ASI should continue monitoring service performance and increase staff coverage as needed to reduce hold times and abandonment of calls. Call center staffing should be adjusted regularly, as needed, to achieve MTA standards for hold times independently of efforts to reduce call volume.”

Federal Transit Administration ADA Compliance Review of Los Angeles County Metropolitan Transportation Authority (MTA), Los Angeles, California, *Compliance Review of ADA Complementary Paratransit Service*, January 27 – 31, 2003, Final Report dated August 2, 2004, pp. 38 and 39, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: “From 5 to 6 p.m., 29 percent of calls to confirm trips were on hold for more than 4 minutes and 20 percent of calls were on hold for more than 5 minutes.”

Recommendation: “Centro should take measures to reduce hold times during afternoon hours, particularly after 3 p.m. This could be accomplished through a combination of several changes, including increasing staffing during these hours, increasing live scheduling and thereby reducing customer call backs, and simplifying the procedures for determining trip eligibility and thereby reducing call times.”

Federal Transit Administration ADA Compliance Review of Central New York Regional Transportation Authority, Syracuse, New York, *ADA Complementary Paratransit Service Compliance Review*, conducted April 23 – 26, 2007, Final Report dated March 5, 2008, p. 58, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: “For all non-abandoned ADA Complementary Paratransit calls made to the call center from January to August 2002, the average hold time was 4:05. This

compares to DDOT’s future goal of a three-minute average hold time. DDOT did not meet this goal in any of these eight months.”

Finding: “For a sample week in August 2002, the average hold time for all non-abandoned calls was 4:23. It is likely that many callers were on hold for more than four minutes.”

Recommendation: “DDOT should increase its staff of call takers to reduce hold times for riders calling for ADA Complementary Paratransit service. It also should review the shift schedules of the call takers to increase the number of active call takers when hold times are longest.”

Federal Transit Administration ADA Compliance Review of Detroit Department of Transportation, Detroit, Michigan, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted September 9 – 13, 2002, Final Report dated July 15, 2003, pp. 31 and 32, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

- 5 This Topic Guide discusses the provisions of the Americans with Disabilities Act (ADA) at 42 U.S.C. § 12143(c)(3), available at www.ada.gov/pubs/adastatuteo8.htm, and of the Department of Transportation (DOT) ADA regulation at 49 C.F.R. § 37.131 and 49 C.F.R. Part 37, App. D, § 37.131, available at www.fta.dot.gov/civilrights/ada/civil_rights_3906.html.
- 6 Much of the material in this section of this Topic Guide on Telephone Hold Time in ADA Paratransit was shared with the American Public Transportation Association (APTA) Accessibility Consensus Standards program, which subsequently released a draft version of a Recommended Practice for public comment (not final) on May 15, 2009, entitled *Recommended Practice for Reservation Hold Times for ADA Complementary Paratransit Call Centers*, available at www.aptastandards.com/Home/AccessibilityDocuments/tabid/283/Default.aspx.
- 7 An FTA letter found that a transit agency “must design and implement its system to avoid busy signals and achieve minimal telephone wait times.”

Michael A. Winter, then Director, Office of Civil Rights, Federal Transit Administration, letter to Ms. Christine Malafi, County Attorney, Suffolk County Department of Law, Hauppauge, New York, February 15, 2007, regarding Suffolk County Transit, Suffolk County, New York. This letter was sent pursuant to a joint investigation by the U.S. Department of Justice (DOJ) and FTA, following a request

by plaintiffs in *Collins v. Suffolk County*, Civ. No. 04-3384 (E.D.N.Y.) that the United States intervene in that litigation. The December 8, 2006, settlement agreement reached by the parties in *Collins* ended the DOJ role. The joint investigation supplemented FTA efforts to resolve two prior complaints, FTA File Nos. 98-0244 and 04-0004, the latter submitted by the plaintiffs in *Collins*.

- 8 In several ADA compliance reviews, including these two, FTA stated that measuring telephone hold times by the maximum allowable time is clearly preferred to measuring hold times by the average hold time.

Finding: "Van Tran's call management system generates data by hour and by day for average telephone call times and hold times, but does not provide data for maximum hold times and call times."

Recommendation: "It is recommended that Van Tran explore the possibility of obtaining data from its call management system on maximum hold times and call times. The current available data that presents only averages does not enable management to identify instances of long individual hold times."

Federal Transit Administration ADA Compliance Review of City of Tucson Transit Services Division, Tucson, Arizona, *ADA Complementary Paratransit Service Compliance Review*, conducted March 24 – 27, 2003, Final Report dated April 1, 2004, p. 32, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "Metro tracks performance by measuring the callers' average time in the telephone queue. This performance measure does not capture the number of callers that have significantly long hold times, which provides a better index of customer service and telephone access."

Recommendation: "Metro should track telephone system performance by measuring the number and percent of calls by the length of time that they are in the phone queue by hour of day."

Federal Transit Administration ADA Compliance Review of Metro, St. Louis, Missouri, *ADA Complementary Paratransit Service Compliance Review*, conducted April 11 – 14, 2005, Final Report dated February 25, 2007, pp. 38 and 39, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

- 9 In several ADA compliance reviews, including these four, FTA found that transit agencies did not have a standard for measuring telephone hold times.

Finding: "Neither the City of Tucson nor Van Tran has any quantitative standards regarding the handling of telephone calls. There are no performance goals for hold times, call times, or queue lengths."

Recommendation: "It is recommended that the City of Tucson establish quantitative performance standards for Van Tran telephone call handling. These performance standards should include thresholds for both maximum and average hold times and call times. This would enable City and Van Tran management to determine when telephone performance might warrant additional staffing or other resources. This would also enable management to inform the riders of expectations for performance."

Federal Transit Administration ADA Compliance Review of City of Tucson Transit Services Division, Tucson, Arizona, *op. cit.*, p. 32.

Finding: "TARTA does not have a policy or standard for performance in responding to telephone calls."

Recommendation: "It is recommended that TARTA adopt policy standards for telephone response and hold times."

Federal Transit Administration ADA Compliance Review of Toledo Area Regional Transit Authority (TARTA), Toledo, Ohio, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted April 2 – 5, 2001, Final Report dated September 10, 2001, pp. 26 – 27, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "CDTA does not have a performance standard for hold or wait times for callers making trip requests for STAR service."

Recommendation: "CDTA should adopt performance standards for STAR's telephone performance. These standards should measure the percent of calls in queue by time increments, that is: 'X %' calls answered within one minute, 'Y %' in two minutes, etc. The upper bound should be set to avoid significantly long hold times."

Federal Transit Administration Compliance Review of Capital District Transportation Authority, Albany, New York, *ADA Complementary Paratransit Service Compliance Review*, conducted June 13 – 16, 2005, Final Report dated January 31, 2007, p. 33, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "MVRTA does not have a standard for telephone performance."

Recommendation: "Although all calls appear to be answered promptly, MVRTA may wish to consider developing a standard for monitoring future telephone performance. This standard should set maximum hold times for incoming calls for a given hour of day."

Federal Transit Administration ADA Compliance Review of Merrimack Valley Regional Transit Authority (MVRTA), Haverhill, Massachusetts, *ADA Complementary Paratransit Service Compliance Review*, conducted March 15 – 18, 2005, Final Report dated December 26, 2006, pp. 40 and 41, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

- 10** In many ADA compliance reviews, including these five, FTA found that transit agencies were not adequately monitoring telephone hold times.

Finding: "CDTA's existing telephone systems for STAR does not measure hold or wait time performance. STAR managers did not otherwise monitor telephone performance."

Federal Transit Administration ADA Compliance Review of Capital District Transportation Authority, Albany, New York, *op. cit.*, p. 33.

Finding: "The telephone system at Transit Express does not appear capable of generating daily service and performance reports. This lack of reporting capability makes it very difficult to ensure that hold time standards are being met."

Recommendation: "MCTS should require contractors to prepare more detailed telephone service reports and keep them on file. These reports should then be periodically checked by MCTS to ensure contract compliance. Daily reports should be prepared which show key service and performance data for each one-hour period of the day. At a minimum, the following information should be tracked by day, and by hour, for both the reservations and dispatch phone lines:

- Average hold times
- Maximum hold times
- Number of abandoned calls
- Average time on hold before abandoned"

Recommendation: "It may also be possible to program the report function to record the number and percentage of calls on hold longer than 2 minutes so that specific information regarding compliance with the hold time standard can be measured."

Federal Transit Administration ADA Compliance Review of Milwaukee County Transit System (MCTS), Milwaukee, Wisconsin, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted July 10 – 13, 2001, Final Report dated January 11, 2002, p. 28, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "TARPS' current telephone system is not equipped with automated monitoring and reporting capabilities. As a result, automated monitoring of performance in serving customer access to TARPS to schedule trips and make other inquiries was not possible. TARTA has ordered a new telephone system with monitoring capabilities."

Recommendation: "It is recommended that TARTA continue with the planned purchase and installation of a new telephone system. It is further recommended that TARTA monitor customer response and hold times."

Federal Transit Administration ADA Compliance Review of Toledo Area Regional Transit Authority (TARTA), Toledo, Ohio, *op. cit.*, pp. 26 and 27.

Finding: "GHTD's call management system is inactive, preventing continuous monitoring of reservations center telephone performance."

Recommendation: "While the assessment team did not observe any delays in responding to incoming calls, GHTD should install the call management system so that supervisors can monitor performance in responding to telephone calls."

Federal Transit Administration ADA Compliance Review of Connecticut Department of Transportation/Greater Hartford Transit District, Hartford, Connecticut, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted June 25 – 28, 2001, Final Report dated December 20,

2001, p. 27, available at
www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "GPTC does not have a telephone management system. Currently, GPTC does not appear to have capacity constraints related to telephone access; however that observation could not be quantified and confirmed."

Recommendation: "As the system, and associated call volume grows, GPTC should consider installing a call management system to track calls."

Federal Transit Administration ADA Compliance Review of Gary Public Transportation Corp. (GPTC), Gary, Indiana, *Compliance Review of ADA Complementary Paratransit Service*, conducted April 22 – 25, 2003, Final Report dated November 21, 2005, pp. 30 – 31, available at
www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

- 11** Several FTA ADA compliance reviews, including the following three, found transit agencies' telephone hold times to be acceptable at or below this standard that 95 percent of calls should be answered within three minutes, and 99 percent of calls should be answered within five minutes.

Finding: "For Paratransit, Inc., there do not appear to be any telephone system capacity constraints. Telephone answer times were well within the contract standard [of 95 percent within one minute and 100 percent within three minutes] for the two-week sample period analyzed."

Federal Transit Administration ADA Compliance Review of Pinellas Suncoast Transit Authority (PSTA), Pinellas County, Florida, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted December 13 – 16, 1999, Final Report dated July, 2000, pp. 26 and 28.

Observation: "As noted in the 'Background' section of this report, the standard established for telephone service for the DART program is that 'contractors are to have sufficient reservationists on duty at all times so that no more than 5% of all callers must remain on hold for more than 1 minute. Furthermore, no caller is to be on hold for more than 3 minutes.'"

Finding: "Telephone access does not appear to constrain customer's ability to make trip reservations. For the week of September 9 to 15, 2007, daily average delays in

answering calls ranged from 5 seconds to 31 seconds. During this week, 85.6 to 98.1 percent of daily calls were answered in less than one minute.”

Federal Transit Administration ADA Compliance Review of Autoridad Metropolitana de Autobuses (AMA), San Juan, Puerto Rico, conducted October 2007 (draft).

Finding: “During the assessment, telephone calls were answered promptly with very few calls placed on hold. Hold times appeared to be about one minute long.”

Federal Transit Administration ADA Compliance Review of Toledo Area Regional Transit Authority (TARTA), Toledo, Ohio, *op. cit.*, p. 26.

- 12** In several ADA compliance reviews, including these three, FTA found that the transit agencies did not monitor by *hourly* average telephone hold times, but rather, monitored in longer increments such as daily average telephone hold times. FTA has found repeatedly that if transit systems are monitoring by averages, the averages must be hourly.

Finding: “There may be calls with significantly long hold times during some periods of the day. During the week of April 2, 2007 the two longest hourly average hold times were 7 and 9 minutes. DART does not regularly monitor telephone performance by hour of day and the BCMS system does not track number of calls by length of time in queue by hour of day. As a result, hourly average hold times for the period May 14 to 17 were not assessed. Although telephone performance measurements for the May 14 to 17 period indicate significant improvement in level of performance on a daily basis compared to the week of April 2, DART does not have the data for the review team to determine that there were no hours during the May 14 week in which customers experienced significantly long hold times.”

Recommendation: “DART should set performance standards and track telephone system performance by measuring the number or proportion of calls by the length of time that they are on hold in the phone queue by hour of day. To accomplish this, DART should request that a report of calls on hold in the queue and maximum hold times, by hour, be provided as part of the new call management system.”

Federal Transit Administration ADA Compliance Review of Delaware Transit Corporation, Dover, Delaware, *op. cit.*, pp. 42 – 43.

Finding: “Current telephone performance reports do not show the hold time distributions for those calls that are on hold more than 50 seconds. Also, the current

reports provide aggregate hold time distributions for the entire week without a breakdown of the data by day of week and hour of the day.”

Recommendation: “COTA should redesign the current weekly telephone reports to show the percentage of calls answered within specific increments of time, up to three minutes—rather than only up to 50 seconds. Reports should also show hold times by day of week and hour of the day. Once these reports are prepared, COTA should review and adjust its staffing schedules for reservationists to address any days and times when holds are consistently long.”

Federal Transit Administration ADA Compliance Review of Central Ohio Transit Authority (COTA), Columbus, Ohio, *op. cit.*, pp. 50 and 51.

Finding: “AMA does not have standards for telephone performance. AMA managers do not regularly monitor or report telephone performance. They were able to provide hold time data on a daily basis, but not for smaller time increments.”

Federal Transit Administration ADA Compliance Review of Autoridad Metropolitana de Autobuses (AMA), San Juan, Puerto Rico, *op. cit.*

- 13** The following six FTA ADA compliance reviews addressed hold times measured by averaging. The first three compliance reviews below found a transit agency telephone hold times to be acceptable. The hold times are roughly consistent with this standard that 99 percent of hourly average hold times should be no more than two minutes. The fourth ADA compliance review below suggested a similar standard. The fifth and sixth ADA compliance reviews below found that more lenient standards were not acceptable. The fifth one made a recommendation that the transit agency should “consider establishing tighter telephone performance standards” that are “significantly less than [those] allowed by current standards.”

Observation: “The review team members observed call taking at various times from Monday, February 24 to Thursday, February 27. Team members recorded 171 incoming calls, of which 108 were for reservations and 63 were customer service calls. Twenty-two of the customer service calls were ‘Where’s my ride?’ calls, and 41 were mostly trip cancellations, confirmation/verifications. Call takers followed their scripts and reminded callers they need to be ready for pickup at the beginning of the 20-minute window given to them in their reservation. No long hold times on the phones were noted during these observations.”

Finding: "ATC has a goal in its contract with EBP of two minutes for its average hold time for telephone calls. Sample data from ATC's call management system yielded an average hold time of 2:15."

Federal Transit Administration ADA Compliance Review of Alameda-Contra Costa Transit District (AC Transit) and San Francisco Bay Area Rapid Transit District (BART), Oakland, California, *Compliance Review of ADA Complementary Paratransit Service*, conducted February 24 – 28, 2003, Final Report dated March 16, 2005, pp. 32 and 33, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Observation: "The results in Table VI.1 suggest that, on average, reservation calls were answered in one minute or less (55-second average for the period). Talk times during the period averaged 1:33. Abandoned calls averaged 491 for the period, about 10 to 11 percent of all calls. The average time to abandon reservations calls was 1:40, relatively constant from month to month. However, it should be noted that the average hold time exceeded two minutes during 22 one-hour time intervals (eight percent of the time) during September 2002."

Finding: "An initial review of the data provided by the BCMS monitor system used by HRT for Handi-Ride suggests that customers have good access to the reservations and dispatch lines."

Federal Transit Administration ADA Compliance Review of Transportation District Commission of Hampton Roads (Hampton Roads Transit), Hampton, Virginia, *Compliance Review of ADA Complementary Paratransit Service*, conducted October 8 – 11, 2002, Final Report dated January 28, 2005, pp. 37 and 40, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "During the months of February to July 2002, Wichita Transit's special services answered calls in 34 seconds, on average. In May 2002, average call waiting times of over one minute occurred from 3:15 to 4:45 p.m. WT's goal is to answer all calls within 20 seconds. Although telephone response times exceed WT's goal, it does not appear to be a significant impediment to customers scheduling trips."

Federal Transit Administration ADA Compliance Review of Wichita Transit, Wichita, Kansas, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted August 12 – 15, 2002, Final Report dated April 21, 2003, p. 23, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "Often the main reservations line appears to have excessively long hold times. A significant percentage of callers (33%) end up abandoning their calls because of the long hold times. The poor level of phone service that was observed and documented could be considered a constraint on the service that could deter customers from requesting trips and using the service."

Recommendation: "MARTA should consider a standard that would define a maximum average hold time for any hourly period of the day. Typically, standards call for average hold times to be no more than two minutes for any hourly period of the day."

Federal Transit Administration ADA Compliance Review of Metropolitan Atlanta Rapid Transit Authority (MARTA), Atlanta, Georgia, *op. cit.*, pp. 25 – 26.

Finding: "Current MTA telephone performance standards appear to be very generous. Average "serving times" (interpreted to be hold times) of five minutes are permitted in Call Group 11 (late ride calls) and even longer holds are permitted 15% of the time. Average "serving times" of four minutes are permitted in Call Group 13 (future trip requests) and even longer holds are permitted 10% of the time. Given that these standards represent daily averages, even if these standards were met, it is possible that many callers could experience hold times of twice these times (eight to ten minutes)."

Recommendation: "MTA should consider establishing tighter telephone performance standards. A standard that defines a desired average hold time for any half-hour period of the day is recommended. The standard for this average hold time be significantly less than the 4 to 5 minutes allowed by current standards. The objective for meeting these standards should also be higher than the 85% now set for Call Group 11 (late calls)."

Federal Transit Administration ADA Compliance Review of Maryland Transit Administration (MTA), Baltimore, Maryland, *op. cit.*, pp. 34 and 35.

Finding: "Metro's policy goal of average times in queue of 4.18 minutes likely results in many calls in queue for periods of time well in excess of 4.18 minutes and would appear to significantly limit ADA complementary paratransit customers' ability to use Call-A-Ride service."

Federal Transit Administration ADA Compliance Review of Metro, St. Louis, Missouri, *op. cit.*, p. 38.

- 14** In this ADA compliance review, the transit agency was in the process of obtaining a new telephone system for the ADA complementary paratransit office. FTA gave examples of Automatic Call Distribution (ACD) telephone system characteristics that would provide the agency with more effective and efficient telephone operations.

Finding: "The current phone system, which does not have a central queue and directs calls to the reservationists even if they are already serving customers, appears to cause stress and potential miscommunications in the reservations process. It also appears that the use of the voice mail system may prevent customers from making timely contact with MATAPlus staff for the purpose of making or changing trip reservations."

Recommendation: "It was noted during the review that MATA is in the process of obtaining a new telephone system for the ADA Complementary Paratransit office. It is recommended that this new system be set-up to place incoming calls in a central queue and then route them to the next available reservationist. Directing calls, one at a time, to the next available reservationist will permit them to stay with one caller, without distractions, until the trip has been fully booked or other services have been provided. While callers are on hold, a message could remind them to have address and other information available and to be ready to record pick-up time information. The message could provide other phone numbers (to redirect callers seeking dispatch or eligibility information). Other useful information about the service could also be provided.

"The new system should also include a real-time call monitoring capability to allow the Operations Manager to monitor the number of callers on hold and the maximum hold time. Additional staff can then be assigned to assist in reservations as needed. The new phone system should also be designed to provide daily, weekly, and monthly call summaries, including hold times, service times, and abandoned calls by hour. This information will allow MATA to better track phone service and reservations performance.

"If a new phone system employing a central call queue is implemented, and adequate staffing to handle incoming calls is provided, the voice messaging system should be discontinued. In the meantime, messages left on voice mail should be checked more regularly and call-backs made to customers as soon as possible."

Federal Transit Administration ADA Compliance Review of Memphis Area Transit Authority (MATA), Memphis, Tennessee, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted February 14 – 17, 2000, Final Report dated August 1, 2000, pp. 11 – 12, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

- 15 Many ADA compliance reviews, including these five, demonstrated that FTA places emphasis on good telephone practices not only for reservation calls, but also for “Where’s My Ride” calls.

Finding: “Dispatchers at the central CCT Connect office sometimes do not appear to be able to respond to customer inquiries in a timely manner.”

Recommendation: “SEPTA should implement a new call-handling process in the dispatch office that will allow designated call-takers to handle customer inquiries and involve appropriate dispatchers as needed. This will allow dispatchers to focus on assisting drivers and will allow straightforward inquiries from customers (pick-up time confirmations, etc.) to be handled in a more timely way. It will also allow call-takers to identify the appropriate dispatcher for customer inquiries and will eliminate transfers of calls between dispatchers.”

Federal Transit Administration ADA Compliance Review of Southeastern Pennsylvania Transportation Authority (SEPTA), Philadelphia, Pennsylvania, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted March 6 – 10, 2000, Final Report dated November 17, 2000, p. 17, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: “Responses to ride checks appeared to be reasonable during the on-site observations by the assessment team. However, consumer representatives indicated that responses to ride checks could take as much as 45 minutes. Telephone staff also noted that they were receiving faster responses on ride checks from dispatchers during the assessment team’s visit than normal.”

Recommendation: “Palm Trans and ATC should consider assigning one Palm Tran or ATC staff person to coordinate ride status and schedule changes on a real time basis with the dispatchers for the four carriers. Such real time coordination could improve response times on ride check calls by making current field information available to telephone staff on a timely basis. The staff person could also improve schedule coordination between ATC and the service providers.”

Federal Transit Administration ADA Compliance Review of Palm Tran Incorporated (Palm Tran), Palm Beach County, Florida, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted April 17 – 20, 2000, Final Report dated January 2001, p. 21, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "First-hand observations suggest that MTA reservation agents sometimes still have difficulty getting through to Yellow Transportation dispatch, which appears to be the main cause of continuing long hold times for callers checking on late rides."

Recommendation: "MTA should work to further reduce hold times for Call Group 11 (late rides). Under the current service design, this might mean working with Yellow Transportation to allow quicker access to dispatchers through the addition of another call taker at the Yellow dispatch office. In the long-term, MTA might also consider bringing dispatch in-house to streamline communications with drivers."

Federal Transit Administration ADA Compliance Review of Maryland Transit Administration (MTA), Baltimore, Maryland, *op. cit.*, pp. 34 and 35.

Finding: "With only one dispatcher on duty during all hours of the day, it appears that calls are frequently routed to voice mail. Even though there is a dispatcher on duty, many messages regarding cancellations are left on voice mail. This could result in miscommunications of desired cancellation information (which was noted in two complaints file with R-GRTA between October 11 and November 8, 2002)."

Recommendation: "In order to avoid potential miscommunication of trip cancellations between customers and dispatchers, R-GRTA should consider ways to either relieve dispatchers of the need to handle phone calls during the times when the Call Center is open, or consider additional dispatch staffing during peak operating hours. Given all of the duties assigned, one dispatcher may not be able to handle primary dispatch functions and calls from riders during peak hours."

Federal Transit Administration ADA Compliance Review of Rochester-Genesee Regional Transportation Authority (R-GRTA), Rochester, New York, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted November 18 – 21, 2002, Final Report dated October 27, 2003, p. 40, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "Riders also indicated that some calls to dispatch go unanswered in the late evenings. According to the dispatchers' schedule, after 7:30 p.m. on weekdays and at almost all hours on weekends, only one dispatcher is on duty. Dispatchers indicated that when they step away from the phones, calls can go unanswered. They indicated that they generally try to get someone else in the building to cover while they step away, but that this is not always done."

Recommendation: "COTA should develop procedures to ensure that there is always telephone coverage in the dispatch area. The procedures should address problems that occur on days and times when there is only one dispatcher on duty and that person needs to step away for a short period of time."

Federal Transit Administration ADA Compliance Review of Central Ohio Transit Authority (COTA), Columbus, Ohio, *op. cit.*, pp. 50 and 51.

- 16** Several FTA ADA compliance reviews, including these two, addressed the problem of secondary holds—answering calls and then putting callers back on hold, which can mask true hold times.

Finding: "Telephone staff were observed responding to calls and placing the caller on hold, de facto, by asking them to wait while conducting other business. As a result the reported hold times understate the period the customer spends waiting for service from telephone staff."

Recommendation: "ATC telephone staff should be instructed to complete one call, including associated activity, before beginning the next call. Doing so could reduce the potential for distraction and error, and produce automated reports which more accurately reflect the time customers spend waiting for telephone service."

Federal Transit Administration ADA Compliance Review of Palm Tran Incorporated (Palm Tran), Palm Beach County, Florida, *op. cit.*, pp. 38 and 40.

Finding: "Referring callers who are on hold and who need immediate assistance to the ADA Complementary Paratransit and general customer service numbers and then transferring these calls back to the reservation line (placing them back at the beginning of the queue) add further to customer frustration in trying to make a trip request."

Federal Transit Administration ADA Compliance Review of Metropolitan Atlanta Rapid Transit Authority (MARTA), Atlanta, Georgia, *op. cit.*, p. 26.

- 17** This FTA ADA compliance review addressed the importance of an adequate number of dispatchers to avoid creating a bottleneck in the system that causes overly long secondary holds and makes dispatchers unavailable to handle other calls.

Finding: "Secondary hold times of up to 5 minutes were observed for several riders who were calling to get updates on the status of late rides. The one dispatcher in the communications center assigned to be the contact point for all ride status calls appears to create a bottleneck that can increase hold times. This bottleneck also appears to keep CSRs tied up and unavailable for other calls."

Federal Transit Administration ADA Compliance Review of Pierce Transit, Tacoma, Washington, conducted November 2007.

- 18** An FTA letter stated that a transit agency "must design and implement its system to avoid busy signals and achieve minimal telephone wait times."

Michael Winter, Letter to Christine Malafi, February 15, 2007, *op. cit.*

- 19** The FTA Suffolk County Transit letter [*ibid.*] also stated:

Finding: "SCT lacks a procedure to monitor the frequency of busy signals or the length of hold times experienced by SCAT riders. Thus, SCT cannot demonstrate its compliance with the requirement to provide telephone access sufficient to meet paratransit demand."

Request: "Please explain what steps SCT will take to ensure that callers seeking paratransit services do not encounter busy signals or long telephone hold times, and what steps SCT will take to monitor the effectiveness of the SCAT phone system. Also, if it has not done so already, SCT should implement a system (automated or otherwise) to record the percent of callers receiving a busy signal, as well as the length of time by percentile (or average and longest length of time if percentile is not possible), broken out by hour of day or comparable unit of time. To the extent such information is available already, please provide that data to FTA."

Michael Winter, Letter to Christine Malafi, February 15, 2007, *op. cit.*

- 20** This FTA ADA compliance review addressed abandoning callers on hold at closing time, thus failing to serve them even though they called before closing time.

Finding: "Any calls left in the queue at the end of the day were abandoned. As a result, some customers calling before 4:30 p.m. are not being served."

Recommendation: "Center staffing schedules should be revised to assure that all customer calls initiated between 7:30 a.m. and 4:30 p.m. are answered. This can be accomplished by scheduling staff to work after 4:30 p.m. until all calls in the phone queue at 4:30 p.m. are answered."

Federal Transit Administration ADA Compliance Review of Metro, St. Louis, Missouri, *op. cit.*, pp. 38 and 39.

- 21** This FTA ADA compliance review indicated the importance of a transit agency having a telephone number that does not require callers to pay long distance toll charges for accessing paratransit service. This phone number should be properly advertised.

Finding: "The toll-free phone number for accessing paratransit service is not well advertised. It is included in a recent Mobility flyer, but is not in the current Rider's Guide."

Recommendation: "MTA should include information about the toll free paratransit phone number in the next printing of the Rider's Guide."

Federal Transit Administration ADA Compliance Review of Maryland Transit Administration (MTA), Baltimore, Maryland, *op. cit.*, p. 35.

- 22** Several FTA ADA compliance reviews, including these five, addressed abandoned calls and discussed problems related to high rates of abandoned calls.

Finding: "During the week of April 2, 2007, the DART reservations center received 4,194 calls. The two longest hourly average hold times during this period were 7 and 9 minutes. Average daily hold times ranged from 1 minute and 25 seconds to 3 minutes and 50 seconds, with a daily average of 2 minutes and 27 seconds. Twenty-three percent of calls during the week were answered in 2 minutes or less. Abandoned calls—calls terminated by the customer before they could be answered—were between 13 and 24 percent of daily calls for each day during that week. This high abandonment rate is an indicator of difficulty in getting through on the phone lines to make reservations at that time."

Recommendation: "DART should maintain the staffing levels of the reservations center used during the week of the on-site review (14 full-time and two part-time reservationists), and adjust as needed to avoid substantially long hold times for ADA eligible individuals who are making trip reservations."

Federal Transit Administration ADA Compliance Review of Delaware Transit Corporation, Dover, Delaware, *op. cit.*, pp. 42 and 43.

Finding: "Often the main reservations line appears to have excessively long hold times. A significant percentage of callers (33%) end up abandoning their calls because of the long hold times. The poor level of phone service that was observed and documented could be considered a constraint on the service that could deter customers from requesting trips and using the service."

Recommendation: "MARTA needs to ensure that there is adequate staffing to meet a higher performance standard MARTA should minimize or eliminate reliance on voice mail and callbacks since this process is time-consuming and unreliable."

Federal Transit Administration ADA Compliance Review of Metropolitan Atlanta Rapid Transit Authority (MARTA), Atlanta, Georgia, *op. cit.*, pp. 25 and 26.

Finding: "During the period July 1, 2000, through January 31, 2001, approximately 19% of customers calling STS abandoned their phone calls. For one sample day, 98% of those who abandoned calls did so after waiting for more than 5 minutes. The long times required to complete a reservation could be considered an operational pattern or practice that significantly limits the availability of service to ADA eligible persons."

Recommendation: "It is recommended that MDTA review the staffing of its trip reservations operation with its contractor to assure that sufficient resources are provide to avoid substantial numbers of significant delays in calling to make trip reservations and take actions as necessary to reduce the number and length of customer hold times."

Federal Transit Administration ADA Compliance Review of Metro-Dade Transit Agency, Special Transportation Services, Miami, Florida, *op. cit.*, p. 22.

Finding: "Callers abandon 20 to 30 percent of calls during the day, with hourly abandonment rates ranging from 10 to 70 percent."

Federal Transit Administration ADA Compliance Review of Metropolitan Tulsa Transit Authority, Tulsa, Oklahoma, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted March 11 – 14, 2002, Final Report dated October 3, 2002, p. 24, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "During the week of February 7 to 11, 2005, Metro received a total of 4,053 calls to the reservation center. Daily average hold times for the four phone lines ranged from 0.65 minutes to 2.45 minutes. Of the 4,053 calls, 737 were abandoned by the caller for an abandonment rate of 18 percent. This high abandonment rate is an indicator of difficulty in getting through on the phone lines to make reservations. Call Center staffing and equipment limits may be contributing to long hold times and high abandonment rates."

Recommendation: "Metro should expand staffing and capacity of the telephone reservations system as needed to achieve telephone service levels that do not impede access to service."

Federal Transit Administration ADA Compliance Review of Metro, St. Louis, Missouri, *op. cit.*, pp. 38 and 39.

- 23** In this ADA compliance review, FTA found that music or informational messages should be used so that callers on hold know they are still in the queue.

Finding: "Leaving callers on hold for up to five minutes without music or any other indication that the call is still in the queue could be causing many people to abandon their calls."

Recommendation: "Music or informational messages should be added to the system so that callers on hold know they are still in the queue."

Federal Transit Administration ADA Compliance Review of Metropolitan Atlanta Rapid Transit Authority (MARTA), Atlanta, Georgia, *op. cit.*, p. 26.

- 24** In this ADA compliance review, FTA found that a limit on the number of trips a caller may arrange on a single telephone call can increase hold times due to the need for repeated customer calls.

Finding: "Metro accepts only four one-way trip requests per call during peak call times. This policy can increase the length of telephone queues by requiring reservationists to handle multiple calls rather than one to serve one customer and placing multiple calls rather than one in the phone queue."

Federal Transit Administration ADA Compliance Review of Metro, St. Louis, Missouri, *op. cit.*, p. 39.

- 25** National Council on Disability, *The Current State of Transportation For People With Disabilities in the United States*, June 13, 2005, pp. 97 – 99.
- 26** This requirement is not in the DOT ADA regulation, but rather in what is called Part 27. Part 27 contains other transit agency obligations including the DOT regulation for Section 504 of the Rehabilitation Act of 1973, another disability rights law. Part 27, which is formally cited as 49 C.F.R. Part 27, is available at www.fta.dot.gov/civilrights/ada/civil_rights_3907.html. The reporting requirement is at 49 C.F.R. § 27.13(b), 49 C.F.R. Subpart C, §§ 27.121 – 27.129.
- 27** Federal Transit Administration Office of Civil Rights, *Rider Complaint Form*, available at www.fta.dot.gov/civilrights/ada/civil_rights_3889.html.
- 28** American Public Transportation Association (APTA), Accessibility Call Center Working Group, *Recommended Practices for Handling ADA Complementary Paratransit "Where's My Ride?" Calls*, draft version released for public comment (not final), May 15, 2009, pp. 4 – 5, available at www.aptastandards.com/Home/AccessibilityDocuments/tabid/283/Default.aspx.
- 29** In this ADA compliance review, FTA found that one of many benefits of providing subscription service for repeat trips is reducing telephone call volume.

Finding: "There are a large percentage of calls that may be avoidable if the system was configured differently. For example, the low percentage of subscription trips contributes to a great deal of calls for individual trips that might typically be subscription trips in another system (e.g., dialysis, school, training, work trips)."

Federal Transit Administration ADA Compliance Review of Sun Metro LIFT, El Paso, Texas, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted January 22 – 25, 2001, Final Report dated May 24, 2001, *op. cit.*, p. 27, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

30 49 C.F.R. § 37.133(b) and 49 C.F.R. Part 37, App. D, § 37.133.

31 In this ADA compliance review, FTA found that if a transit agency has no denials for paratransit service, there is no need to limit the amount of paratransit capacity dedicated to subscription service. FTA recommended accepting all requests for subscription service, in order to reduce the number of on-call trips that must be addressed in the reservations and scheduling process.

Finding: "Although there appear to be no denials for TARPS service, TARTA's contract with Laidlaw limits subscription trips to 50% of the trips during any hour of the service day."

Recommendation: "TARTA should consider accepting all requests for subscription trips without limit to reduce the number of on-call trips to be addressed in the reservations and scheduling process."

Federal Transit Administration ADA Compliance Review of Toledo Area Regional Transit Authority (TARTA), Toledo, Ohio, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted April 2 – 5, 2001, Final Report dated September 10, 2001, p. 32, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

32 49 C.F.R. Part 37, App. D, § 37.131, *originally published at* 56 Fed. Reg. 45747 (Sept. 6, 1991).

33 In these two ADA compliance reviews, FTA illustrated the significant drawbacks of using voicemail and callbacks for reservation calls.

Finding: "The inability to handle calls in a timely way appears to be creating additional work that further reduces staff's capacity to handle incoming calls. About 100 callbacks appear to be made per day to contact people who have left messages after being on hold for ten minutes. Twenty-five percent of the time these callbacks are unsuccessful in reaching customers."

Recommendation: "MARTA needs to ensure that there is adequate staffing to meet a higher performance standard MARTA should minimize or eliminate reliance on voice mail and callbacks since this process is time-consuming and unreliable."

Federal Transit Administration ADA Compliance Review of Metropolitan Atlanta Rapid Transit Authority (MARTA), Atlanta, Georgia, *op. cit.*, p. 26.

Finding: "A sample of call-backs indicated that 86% of required callbacks were confirmed. The use of call-backs rather than real time scheduling with a single call increases the potential for miscommunication between call takers and customers."

Recommendation: "TARTA should consider a reservations and scheduling system that completes the reservation request and confirmation in one call, thereby reducing the potential for communication errors."

Federal Transit Administration ADA Compliance Review of Toledo Area Regional Transit Authority (TARTA), Toledo, Ohio, *op. cit.*, p. 27.

- 34** In this ADA compliance review, FTA found that the transit agency failed to maintain the TTY in working order.

Finding: "The TTY at the MTA office does not appear to be working. The unit was not functioning at the time of the assessment and follow-up calls made a month later indicate continuing problems."

Recommendation: "MTA should immediately repair the TTY line/unit. Even though many persons with TTYs use the Maryland Relay service, some individuals may prefer direct communications with the Mobility office."

Federal Transit Administration ADA Compliance Review of Maryland Transit Administration (MTA), Baltimore, Maryland, *op. cit.*, pp. 34 and 35.

- 35** In many ADA compliance reviews, including these seven, FTA found that transit agencies did not ensure an adequate number of call takers, and/or did not match the greatest number of available call takers to the times when the greatest volume of calls was expected.

Finding: "Available staffing for phone coverage in Syracuse steadily decreases after 3 p.m. even though call volumes are highest between 3 and 5 p.m. This leads to longer telephone hold times."

Recommendation: "Centro should take measures to reduce hold times during afternoon hours, particularly after 3 p.m. This could be accomplished through a combination of several changes, including increasing staffing during these hours, increasing live scheduling and thereby reducing customer call backs, and simplifying the procedures for determining trip eligibility and thereby reducing call times."

Federal Transit Administration ADA Compliance Review of Central New York Regional Transportation Authority, Syracuse, New York, *op. cit.*, p. 58.

Finding: "ATC's peak staffing for call-takers is from 1 PM to 3 PM. However, call management data indicates that the peak time for calls is from 3 PM to 5 PM."

Recommendation: "ATC should review its staffing schedule for call-takers and adjust it to match the call volumes."

Federal Transit Administration ADA Compliance Review of Alameda-Contra Costa Transit District (AC Transit) and San Francisco Bay Area Rapid Transit District (BART), Oakland, California, *op. cit.*, p. 33.

Finding: "There did not appear to be adequate staff to handle trip reservation calls during the busiest call times of the day."

Recommendation: "MARTA needs to ensure that there is adequate staffing to meet a higher performance standard such as the one suggested above. MARTA should minimize or eliminate reliance on voice mail and callbacks since this process is time-consuming and unreliable."

Federal Transit Administration ADA Compliance Review of Metropolitan Atlanta Rapid Transit Authority (MARTA), Atlanta, Georgia, *op. cit.*, p. 26.

Finding: "The reservation function at MATAPlus does not appear to be adequately staffed. To handle incoming calls during the peak morning and afternoon times observed, staff was working extremely hard and fast. Still, to handle calls in a timely manner during these peak times, several staff members from other areas had to get involved in the reservations process. This causes trip request information to be spread throughout the office and increases the likelihood that information will not be fully and accurately reflected in the computer system when it is eventually entered."

Recommendation: "It is strongly recommended that MATA provide for a second dedicated reservationist on weekdays and that reservations capacity at other times be evaluated (the review team did not observe weekend operations)."

Federal Transit Administration ADA Compliance Review of Memphis Area Transit Authority (MATA), Memphis, Tennessee, *op. cit.*, p. 11.

Finding: "Staffing appears to be inadequate at a number of the carriers' call centers during some periods of the day."

Recommendation: "MTA and ASI should continue monitoring service performance and increase staff coverage as needed to reduce hold times and abandonment of calls. Call center staffing should be adjusted regularly, as needed, to achieve MTA standards for hold times independently of efforts to reduce call volume."

Federal Transit Administration ADA Compliance Review of Los Angeles County Metropolitan Transportation Authority (MTA), Los Angeles, California, *op. cit.*, pp. 38 and 39.

Finding: "Between 7:00 AM, when reservation lines are opened, and 8:30 AM, only one person is available for taking trip reservations and dispatching while also addressing scheduling tasks. It appeared that during busy periods, the effort of addressing all three functions is more than one person could effectively handle. This could result in calls not being answered in a timely fashion."

Recommendation: "It is recommended that TARTA increase staff availability to take calls when phone lines open at the beginning of the day until 8:30 AM when a second worker's shift begins. This could be done by: (1) increasing staff assignments to two people during this period, or (2) deferring other work tasks, such as scheduling, until 8:30 AM when a second person is available to cover phones. On April 11, 2001, TARTA issued an information bulletin (Attachment G) to its customers advising them that the hours for telephone reservations would change from 8:00 AM to 5:00 PM effective April 15, 2001. The previous hours were 7:00 AM to 6:00 PM. The new hours correspond to TARTA's office hours."

Federal Transit Administration ADA Compliance Review of Toledo Area Regional Transit Authority (TARTA), Toledo, Ohio, *op. cit.*, pp. 26 – 27.

Finding: "It appears that the reservations staffing level during the week of April 2 limited the ability of customers to make reservations and obtain DART ADA paratransit service."

Recommendation: "DART should maintain the staffing levels of the reservations center used during the week of the on-site review (14 full-time and two part-time reservationists), and adjust as needed to avoid substantially long hold times for ADA eligible individuals who are making trip reservations."

Federal Transit Administration ADA Compliance Review of Delaware Transit Corporation, Dover, Delaware, *op. cit.*, pp. 42 and 43.

- 36** In several ADA compliance reviews, including these three, FTA found that transit agencies did not consider scheduled and unscheduled absences, in order to ensure that staff numbers are adequate even if some agents are on leave or call in sick.

Finding: "STAR has two reservationists during most of the time during the hours that it accepts reservations. However, there is no assigned backup staff when a reservationist calls in sick, goes to lunch, or leaves the room for any other reason. The dispatchers and other STAR office staff have secondary responsibility for answering the phone, but are usually engaged in their other tasks."

Federal Transit Administration ADA Compliance Review of Capital District Transportation Authority, Albany, New York, *op. cit.*, p. 33.

Finding: "According to the call center supervisor, the ideal peak staffing (10 AM to 2 PM) is eight call takers. However, the call center is rarely staffed at the desired levels. Individuals on medical leave have occupied several of the full-time positions. The assessment team also was told that absenteeism is a problem that contributes to understaffing."

Federal Transit Administration ADA Compliance Review of Detroit Department of Transportation, Detroit, Michigan, *op. cit.*, p. 31.

Finding: "Access to both the CCT Connect reservations and dispatch functions appears to be impacted by inconsistent staffing patterns. When a full complement of reservationists and dispatchers is available, phone performance appears to be quite good. When just a few positions are vacant for a day, phone performance is impacted significantly. The current practice of using temporary employees for these functions appears to have an impact on the ability to manage staffing in these areas."

Federal Transit Administration ADA Compliance Review of Southeastern Pennsylvania Transportation Authority (SEPTA), Philadelphia, Pennsylvania, *op. cit.*, p. 53.

- 37** In this ADA compliance review, FTA lauded a transit agency practice of cross-training to enable available staff to assist in other areas of operations as needed. FTA found there are benefits from this operational practice.

Finding: "It is Metro's practice for reservation clerks to rotate into the dispatch center and handle customer assistance calls. This appears to be very beneficial because it allows the reservation clerk to understand additional aspects of the reservation process and gives the clerk a greater sensitivity to the customer's needs."

Federal Transit Administration ADA Compliance Review of Metro, St. Louis, Missouri, *op. cit.*, p. 38.

- 38** In these two ADA compliance reviews, FTA indicated the importance of telephone menus and call options that are clear and customer-friendly, rather than confusing to riders and leading to errors. In the first review, FTA lauded the transit agency telephone menus, and in the second review, found difficulties with them.

Finding: "The phone system used by MetroAccess appears to have sufficient capacity to handle the current call volume. The menu is clear and usually directs the caller to the proper department."

Federal Transit Administration ADA Compliance Review of Washington Metropolitan Area Transit Authority (WMATA), Washington, D.C., *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted September 24 – 28, 2001, Final Report dated June 26, 2007, p. 27, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

Finding: "Instructions for canceling rides appear to be confusing. One way indicated to cancel rides (by pressing "1" when calling the main reservations number) results in callers being disconnected. Cancellations after 5:00 PM require two calls and then only allow the caller to leave a voice message. This could discourage or even confuse some riders and result in late cancellations or even no-shows if riders cannot efficiently cancel trips."

Recommendation: "It is recommended that the R-GRTA review procedures and instructions provided to riders for canceling trips and revise the procedures to permit customers to easily cancel rides when necessary."

Federal Transit Administration ADA Compliance Review of Rochester-Genesee Regional Transportation Authority (R-GRTA), Rochester, New York, *op. cit.*, p. 40.

39 In these three ADA compliance reviews, FTA findings illustrated the importance of developing call handling procedures and scripts that serve as the basis of staff training and provide step-by-step instructions, in order to ensure the consistent gathering of trip request information. In the first ADA compliance review below, FTA lauded the transit agency practices. In the second and third compliance reviews, FTA found difficulties with the lack of scripts, or the lack of using scripts.

Finding: "The ASI Policy Manual appears to provide very comprehensive procedures for call taking. Use of the ASI Manual and associated scripts by call-takers appear to minimize the potential for miscommunication in scheduling trip requests."

Federal Transit Administration ADA Compliance Review of Los Angeles County Metropolitan Transportation Authority (MTA), Los Angeles, California, *op. cit.*, p. 39.

Finding: "Carriers do not have prepared scripts for call takers, and call takers are not consistent in confirming the trip details at the end of a call."

Recommendation: "HRT should develop a basic script for call takers to use to ensure the consistent gathering of trip request information among all carriers."

Federal Transit Administration ADA Compliance Review of Transportation District Commission of Hampton Roads (Hampton Roads Transit), Hampton, Virginia, *op. cit.*, pp. 40 and 41.

Finding: "Carriers have prepared scripts for call takers, but the call takers did not use the scripts on a consistent basis."

Recommendation: "PVTA should develop a script for the call takers of all carriers to ensure the consistent gathering of trip request information among all carriers."

Federal Transit Administration ADA Compliance Review of Pioneer Valley Transit Authority, Springfield, Massachusetts, *Assessment of ADA Complementary Paratransit Service Capacity Constraints*, conducted July 15 – 18, 2002, Final Report dated January 21, 2003, pp. 25 and 26, available at www.fta.dot.gov/civilrights/ada/civil_rights_3899.html.

40 This requirement is not in the DOT ADA regulation, but rather in what is called Part 27. Part 27 contains other transit agency obligations including the DOT regulation for Section 504 of the Rehabilitation Act of 1973, another disability rights law. Part 27, which is formally

cited as 49 C.F.R. Part 27, is available at www.fta.dot.gov/civilrights/ada/civil_rights_3907.html. The reporting requirement is at 49 C.F.R. § 27.13(b), 49 C.F.R. Subpart C, §§ 27.121 – 27.129.