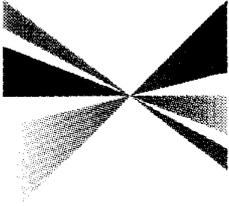


Southern California Rideshare

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SOUTHERN CALIFORNIA



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June 14, 1999

JUN 18 1999

Magalie Roman Salas
Federal Communications Commission, Portals II
445 12th Street, SW, Suite TW-A325
Washington, DC. 20554

Re: File No. NSD-L-99-24

CC DOCKET: 92-105

Dear Mrs. Salas:

The Southern California Association of Governments (SCAG), the regional planning agency for Southern California, is very pleased to see the interest that has been generated in the concept of a national traveler information telephone number.

We also appreciate the opportunity to participate in the determination process established by the FCC regarding potential approval or non-approval of the concept and do so by filing our official comments herein.

While the idea of a nationwide, three digit number is not without merit and indeed does have several positive reasons why it should be established, SCAG believes that there are a number of important issues and potential problem areas that need to be addressed before a three digit number for transportation is authorized.

ISSUES AND POTENTIAL PROBLEMS

The following are areas where issues and potential problems might arise in the establishing of a three digit nation-wide commuter transportation number.

Wide Variety of Information Being Requested: "Transportation" is a very broad subject area. People are likely to call to find out why their local traffic signal isn't working; to get a taxi; to get a pot hole fixed; to schedule a dial-a-ride trip; to get congestion information; to get bus schedules and more. In the Los Angeles area alone, the answers to these questions...and the ability to provide the service requested...is dispersed among hundreds of different public

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and private agencies. It would be extremely difficult to maintain such a wide variety of data from multiple sources in a complete, accurate, and up-to-date data base.

Unrelated and misdirected calls are already a frequent occurrence with our current region wide system. It is called 1-800-COMMUTE and mirrors the proposed system in that it is toll free, serves a wide area and houses multiple providers who dispense commuter information ranging from transit, to rideshare information, to rail schedules, real time construction and traffic congestion information and more. With a system like the one being proposed, the problem would be magnified with unrelated calls "clogging" the system. For example, people call our present system asking about jobs, about how to get to the doctor or the bank and if we can send a car to take them to the super market or the concert being held at the Hollywood Bowl on Friday night. It's the same with the 911 number which also receives a lot of non-emergency calls that are about things such as minor cuts, colds, the flu and requests for routine transportation to medical office appointments or clinics. These types of unrelated and misdirected calls utilize time and resources which take away time from the primary responsibility of responding to emergencies or in our case commuter situations.

Need for On-going Political/Public Support: The 911 number, which is widely perceived to be a valuable service and has strong political, public, and media support is underfunded. A three digit transportation number could be even more expensive to administer, but would not be perceived as having as high a priority as the emergency 911 number. If not generously funded on a long term basis, the program would only generate a public backlash as complaints of long waits, lack of information, and poor service accumulated.

Technical Feasibility: The system design concept in itself would at best be complicated. That coupled with the necessary buy-in and participation of the hundreds of potential providers across the country, each having their own agendas and program needs, bring into question the feasibility of such a concept.

Staffing: Due to the wide variety of information likely to be requested, the geographic dispersion of the callers, the difficulty of keying in complex requests using the phone key pad, and the complex phone trees that would have to be designed to handle the calls automatedly, most calls would have to be handled by live operators. In an area like Los Angeles as well as in many other large metropolitan areas, that could require hundreds of information agents.

Multiple/Overlapping Jurisdictions: Police, fire and emergency medical services are provided by a relatively small number of agencies. The number of "transportation" agencies is greater by orders of magnitude. Simply completing an inventory of who is responsible for what and where would be extremely difficult. Going the second step...getting interagency coordination and cooperation among these agencies would be more difficult still. And that doesn't even address the technical issues of obtaining current, accurate information in standardized formats, and organizing that information for easy dissemination to the public.

Maintaining the System and Updating Information: A whole separate issue, aside from obtaining current, accurate information, is responding to system problems and development needs submitted by the hundreds of providers on an ongoing basis. They may be technical, software or design related in nature but, in any case could require substantial resources and expertise to support. In addition, the integrity of the system will necessitate that all parties involved also maintain updated information at all times, no small request when one looks at the magnitude of the operation.

Funding: The funding for the 911 emergency number is provided by local governments - what is the proposed funding source for a three digit transportation number?

Some other issues that need to be considered are:

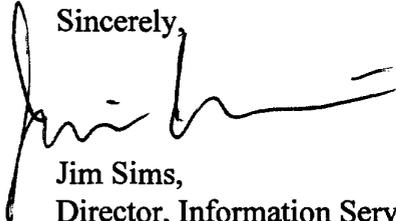
- Identify long term funding sources
- Assess public agency resources, capabilities and willingness to participate
- Will there be a governing body that oversees the overall system operation? If so, how will that body be determined?
- Is the Internet a better medium for this service?

SUMMARY

In summary, while establishment of a three digit transportation number may sound simple, it is an extremely complex proposition. The technical, financial and administrative difficulties involved in meeting the public expectations for information and services are formidable, and should not be underestimated.

Perhaps a "pilot" project should be implemented to test the concept before going "nationwide". That way everyone involved could get a clear understanding of the feasibility of implementing such a system. With that approach, it appears that there is nothing to lose and everything to gain.

Sincerely,



Jim Sims,
Director, Information Services

CC: Docket No. 92-105