



**STATE OF TENNESSEE
DEPARTMENT OF TRANSPORTATION**

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BUTCH ELEY
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BILL LEE
GOVERNOR

February 21, 2025

Mr. Matthew Welbes, Executive Director
Federal Transit Administration
1200 New Jersey Avenue SE, 4th Floor
Washington, D.C. 20590

RE: 49 USC 5311(f) Intercity Bus Program – State of Tennessee

Dear Mr. Welbes:

I write today as Governor Bill Lee's designee in matters involving the State of Tennessee and the Federal Transit Administration (FTA). I hereby certify to the Secretary of the United States Department of Transportation that the intercity bus service needs of the State are being met adequately. Pursuant to 49 U.S.C. 5311 (f)(2), the State accordingly does not intend to expend 15 percent of its federal fiscal years 2024, 2025, and 2026 Section 5311 apportionments to carry out a program for the development and support of intercity bus transportation as would be required by federal law in the absence of this certification.

In December 2024, the State completed a comprehensive assessment of statewide intercity bus mobility needs which included:

- a review of previous studies,
- a survey of statewide stakeholders (local governments, intercity bus riders, rural transit users, chambers of commerce, trip generators) and a survey of intercity bus and transit service providers,
- discussions with the Tennessee Public Transportation Association (TPTA) to assess intercity bus needs relative to other rural needs in the state,
- identification of intercity bus providers in the state, station locations, route locations, route frequencies, and feeder routes,
- geospatial analysis of existing station location and population coverage, and
- a transit propensity analysis using U.S. Census data.

As part of Tennessee's statewide intercity bus needs assessment, the State consulted with affected intercity bus operators. That consultation process contained:

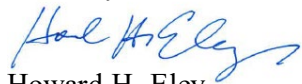
- an identification of intercity bus providers in the State,
- consultation activities with identified providers and intercity bus organizations,
- an opportunity for intercity bus providers to submit proposals for funding a part of the State's distribution of its annual apportionment, and
- a direct correlation between the results of the consultation process and a determination that the State's intercity service needs are being met adequately.

Key findings from the assessment and consultation process found:

- over 80 percent of Tennessee residents live within 25 miles of an intercity bus station,
- public transportation is available in all 95 counties of Tennessee including feeder service and general rural demand response service to intercity bus station locations,
- intercity bus providers during the consultation process did not provide specific data to detail or propose implementation of intercity bus service that would improve the intercity bus network (only the need to maintain current intercity bus services),
- intercity bus providers emphasized the need for continued communication and coordination with other transportation providers for mutually beneficial capital investments and interlining service, and
- based on the level of demand and services throughout Tennessee intercity bus needs are being adequately met.

If you have any questions regarding this matter, please do not hesitate to contact, Daniel Pallme, Director of the Passenger Transportation, Rail & Freight Division at (615) 741-4031.

Sincerely,



Howard H. Eley

Commissioner of Transportation

cc: Dr. Yvette Taylor, FTA Region 4, Regional Administrator
Robert Buckley, FTA Region 4, Financial Management & Program Oversight Director
Preston Elliott, TDOT Chief of Planning
Dan Pallme, TDOT Assistant Chief of Planning/Passenger Transportation, Rail, & Freight Director
Kaitlyn McClanahan, TDOT Public Transportation Manager