

# 2024 Tennessee Intercity Bus Needs Assessment

December 2024

Prepared for:



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# 1. Executive Summary

## Conclusions

- The assessment recommends the Governor's certification that Intercity Bus needs are adequately met.

## Recommendations

- Actively facilitate coordination between ICB operators, municipalities, and transit agencies, particularly regarding access to public facilities.
- Commission a study investigating a potential state-contracted intercity bus service in Tennessee in line with the recommendations from the 2023 Tennessee Commission on Intergovernmental Relations (TACIR) report, "Back on Track? Intercity Passenger Rail Options for Tennessee."
- Increase coordination between TDOT Multimodal and comparable staff in surrounding state DOTs.
- Revisit the eligible activities for TDOT's 5311(f) American Rescue Plan funding to support intercity bus providers' current needs.

# 2. Requirements of FTA Section 5311(f) Program

Federal statute 49 USC Chapter 53 Section 5311(f) requires each state to expend at least 15 percent of its annual Section 5311 apportionment "to carry out a program to develop and support intercity bus transportation" unless the governor certifies that "the intercity bus service needs of the state are being met adequately." Additionally, Section 5311(f) requires a state to consult with ICB providers before the governor makes this certification. The requirement to spend at least 15 percent applies only to the amount of FTA's annual apportionment of Section 5311 funds to the state; it does not apply to any funds the state subsequently transfers to its Section 5311 program from another program. Note that FTA Circular 9040.1G states that "...the assessment of intercity bus needs may be made relative to other rural needs in the state," which has historically been interpreted to allow states to balance the need of intercity bus against the needs of rural transit providers in funding determinations.

In many states, intercity bus service is a vital link between otherwise isolated rural communities and the rest of the nation. Historically, major intercity bus carriers abandoned less productive routes. Patronage generated in rural areas, however, appears to be important to the continuing viability of the remaining intercity routes. The objectives of funding for intercity bus service under Section 5311 are:

- Support the connection between rural areas and the larger regional or national system of intercity bus service.

- Support services to meet the intercity travel needs of residents in rural areas.
- Support the infrastructure of the intercity bus network through planning and marketing, assistance, and capital investment in facilities. FTA encourages states to use the funding under Section 5311(f) to support these national objectives, as well as priorities determined by the state.

FTA Circular 9040.1H defines Intercity Bus as: "Regularly scheduled bus service for the general public that operates with limited stops over fixed routes connecting two or more urban areas not in close proximity, that has the capacity for transporting baggage carried by passengers, and that makes meaningful connections with intercity bus service to more distant points if such service is available."

Intercity service is not limited by the size of the vehicle used or by the identity of the carrier. Intercity bus does not include air, water, or rail service. While much of the public transportation service assisted under Section 5311 covers large distances because of the nature of the areas served, not all long-distance trips are included in the definition of intercity service. For example, a service that provides extensive circulation within a region (in contrast to regular but infrequent service from limited points in the community of origin to limited points in the destination community) is not considered an intercity service, although it may be an eligible public transportation service. Similarly, service that only incidentally stops at an intercity bus facility among other destinations within the city at either end of a route that covers a long distance, without regard to scheduled connections, is eligible for Section 5311 assistance as public transportation but is not an intercity feeder service.

Eligible services and service areas: connection to the national network of intercity bus service is an important goal of Section 5311(f), and services funded must make meaningful connections wherever feasible. Intercity bus projects may include package express service if it is incidental to passenger transportation. The definition of intercity bus does not include commuter service (service designed primarily to provide daily work trips within the local commuting area). Commuter service is excluded because it is considered a local public transportation service eligible for assistance under Section 5311 but does not count toward the required percentage for Section 5311(f).

Eligible activities under Section 5311(f) must support intercity bus service in rural areas. Section 5311(f) specifies eligible intercity bus activities to include "planning and marketing for intercity bus transportation, capital grants for intercity bus shelters, joint-use stops and depots, operating grants through purchase-of-service agreements, user-side subsidies and demonstration projects, and coordination of rural connections between small public transportation operations and intercity bus carriers." This listing does not preclude other capital and operating projects for the support of rural intercity bus service.

FTA encourages the participation of private companies that provide public transportation to the maximum extent feasible in this and other FTA programs. Among the various types of projects in which private intercity bus providers may wish to participate are improvements to existing intercity terminal facilities for rural passengers, modifications to transit facilities to facilitate shared use by intercity bus, intercity rail, and rural transit operators, operating assistance to support specific intercity route segments and applications of intelligent transportation systems (ITS) technology for coordinated information and scheduling.

## **2.1. Compliance with Program Requirements**

The 2024 Intercity Bus Needs Assessment process followed the guidelines set forth in FTA Circular 9040.1G and includes an assessment of current intercity bus service, an analysis of statewide needs, and a consultation process with intercity bus providers.

### **2.1.1. Assessment of intercity bus service currently available and determination of existing statewide intercity mobility needs relative to other rural needs in the state**

This portion of the needs assessment included the following outreach and analysis methods:

- A survey of statewide stakeholders (local governments, intercity bus riders, transit users, chambers of commerce, and others) and a survey of intercity bus and public transit providers
- Identification of intercity bus providers in the state, station locations, route frequencies, and feeder routes
- Analysis of existing station locations and nearby populations
- Analysis of historical patterns in intercity bus and feeder service provision
- Transit propensity analysis
- Trip generator analysis

### **2.1.2. Documentation of consultation process with intercity bus providers**

A consultative process with intercity bus providers was carried out to meet the following requirements, as described in FTA Circular 9040.1G:

- "Inform intercity bus carriers of the state's rural planning process and encourage their participation in that process, and where a state is considering possible certification of needs being met adequately, provide an opportunity to submit comments, and/or request a public meeting to identify unmet needs and discuss proposals for meeting those needs."
- "Inform intercity bus providers about the development of local, coordinated public transit-human services transportation plans required by Section 5310 and encourage intercity bus provider participation."

- "Solicit comments through direct mail and advertise in newspapers in various locations around the state of the state's intent to certify needs are being met adequately unless needs are identified."

Consultation activities for this study included:

- Identification of interlining and non-interlining intercity bus providers in the state:
  - Provider websites
  - Discussions with TDOT staff
  - Consultative meetings with intercity bus and public transit providers
  - Intercity bus and public transit provider survey responses
- Consultation activities with identified intercity bus and public transit providers included:
  - Two group consultative meetings with intercity bus and public transit providers
    - April 3<sup>rd</sup>, 2024
    - April 17<sup>th</sup>, 2024
  - Individual consultative meetings with intercity bus and rural transit providers, the need for which was identified through group consultative meetings, survey responses, and email correspondence
  - An intercity bus and public provider survey
  - Email correspondence regarding the intercity bus assessment process

An opportunity for intercity bus providers to propose projects that meet the existing intercity bus needs: During the consultative meetings and in the provider survey, intercity bus providers were given the opportunity to identify services and other support from TDOT necessary to fulfill unmet intercity bus needs in Tennessee.

## **3. Previous Plan Review**

### **3.1. TDOT Intercity Bus Consultation CARES Act Report (2020)**

The Federal Government passed the Coronavirus Aid, Relief, and Economic Security (CARES) Act on March 27, 2020; Tennessee received \$64,523,351 for the Section 5311 program, of which 15 percent (\$9,678,502) is set aside for intercity bus service. Funding can be used for expenses incurred on or after January 20, 2020, that help prevent, prepare for, and respond to economic or other conditions caused by COVID-19.

TDOT conducted a COVID-specific Consultation process with intercity bus providers to determine need and impact of the pandemic on intercity bus service in Tennessee. The consultation process included a survey of providers. Greyhound and Miller responded to TDOT's June 2020 survey. Both intercity bus providers reported a 60 to 79 percent negative impact on Tennessee service and revenue due to COVID-19. Neither carrier had terminated Tennessee stops at this time, but Greyhound had reduced operating frequency by 50 percent of overall mileage and 55 percent of scheduled stops as

compared to pre-COVID levels. Greyhound has since closed its stops in Covington, Dyersburg, and Union City. Miller has discontinued service altogether in Tennessee since the June 2020 survey.

TDOT acknowledged the impact of the pandemic on intercity bus service and allocated 15% of the CARES apportionment (\$9,678,502) to eligible intercity bus providers, with Greyhound being awarded \$9,160,503 and Miller receiving \$518,000 to offset network losses. As of the writing of this report, Greyhound has since submitted claims for the entirety of its awarded CARES funding, while Miller is working through the TDOT reimbursement process.

TDOT used the same method of allocation to provide funds to intercity bus providers for the American Rescue Plan funds set aside in the apportionment table for intercity bus, totaling \$2,912,502. TDOT issued an allocation letter in early 2024 awarding additional COVID-19 relief funds to Greyhound in the amount of \$2,756,683, and Miller in the amount of \$155,819.

### **3.2. 2021 Tennessee Intercity Bus Needs Assessment**

TDOT most recently completed an intercity bus needs assessment in 2021, which identified existing service levels, tracked service changes since the last assessment, and determined whether intercity bus needs are being adequately met.

The 2021 Assessment found that intercity bus needs across Tennessee were adequately met based on the following factors:

- 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 ICB station locations.
- No intercity bus routes were eliminated, and no stations closed due to the COVID-19 pandemic.
- ICB providers during the consultation process did not provide specific data to detail or specific proposals to implement ICB service that would address unmet demand for the service. ICB providers noted that there is no new need for ICB, only the need to maintain current ICB services.
- ICB providers emphasized the need for communication and coordination with other transportation providers for scheduling and fare ticketing. Communication and coordination opportunities currently exist through TDOT, ICB providers, and rural transit providers to address these needs without additional funding.
- ICB providers suggested that demand for service is unknown and is only determined once on-the-ground service enters into operations.

Other recommendations were identified, including:

- Inclusion of intercity bus providers to TDOT distribution lists
- Intercity providers should regularly check TDOT's website for opportunities to participate in planning activities
- TDOT should create a streamlined method of communication and coordination with ICB providers regarding the annual 5311 grant application process and apportionment
- ICB and rural transit providers should integrate schedules using available technology to streamline the passenger experience for trip interlining, ticket purchasing, and an ability to find service to available destinations inter and intra-state

### **3.3. TACIR Report: *Back on Track? Intercity Passenger Rail Options for Tennessee***

The Tennessee Advisory Commission on Intergovernmental Relations (TACIR) developed *Back on Track? Intercity Passenger Rail Options for Tennessee*, in which TACIR identifies intercity rail corridors in Tennessee and recommends that TDOT seek federal funding to study and plan for implementation of intercity rail.

The TACIR report recognized the importance of intercity bus in connecting rural areas to urban areas, especially where intercity rail may not be feasible. Intercity bus improvements are recommended as an interim solution given the length of time intercity rail takes to develop and the comparative flexibility and speed with which intercity bus can be implemented. Intercity bus is also recognized as a permanent solution, with the following corridors specifically identified:

- Along US-64 between Memphis and Nashville, via currently unserved communities
- Increased service along I-40 and I-81, connecting Memphis, Nashville, Knoxville, and Bristol

State-contracted service managed by the Virginia Department of Transportation (VDOT) is specifically mentioned in the TACIR report and is the subject of **Section 4.1** of this report.

### **3.4. Coordinated Public Transit-Human Services Transportation Plans (CPT-HSTP)**

TDOT assisted the following entities in Tennessee to update the regional CPT-HSTPs in 2022: Southwest Human Resource Agency, South Central Tennessee Development District, and the Southeast Human Resource Agency. Each agency identified the establishment of a regional transportation advisory board as a key step to increasing coordination and communication among transportation providers and other service providers, including intercity bus providers.

## 4. State ICB System Peer Review

The establishment of a Tennessee ICB program has gained interest in light of the Tennessee Advisory Commission on Intergovernmental Relations (TACIR) report regarding intercity passenger rail in Tennessee, as referenced in Section 3.3 of this report. While the TACIR report recommendations largely focus on establishing an intercity rail network, intercity bus was recommended as an option both during the establishment of a rail network and on a permanent basis on some corridors within the state. The TACIR Report's intercity bus service focused on service within Tennessee's borders, rather than the wider national network.

As part of this ICB needs assessment, peer reviews were conducted to explore the extent of possibility for the type of intercity bus service identified in the TACIR Report and how it could intersect with the existing national intercity bus network. TDOT and WSP conducted a series of interviews with other state departments of transportation that fund and manage ICB systems in their state, including the Virginia Department of Transportation and the Washington Department of Transportation. The following two sections summarize key details and insights from the respective Virginia and Washington ICB program managers.

### 4.1. Virginia Department of Transportation

#### 4.1.1. Program History

The Virginia Department of Transportation, through its Division of Rail and Public Transportation (DRPT), funds and manages the Virginia Breeze ICB service, a statewide service operating within Virginia state lines. **Figure 4-1** below displays the four (4) routes currently operating, each of which operates out of Washington D.C., and traverses the entirety of the state, serving different portions of Virginia. Virginia Breeze initially began with the Valley Flyer in 2017 (originally referred to as the Virginia Breeze), the pink line in **Figure 4-1**, but has since added the three (3) additional displayed routes.

*Figure 4-1: Virginia Breeze Bus Lines Route Map (Source: Virginia DRPT)*



Prior to 2017, DRPT typically certified that ICB needs were being adequately met and awarded the 15 percent 5311(f) set aside to rural transit agencies. However, a 2013 ICB needs assessment concluded that there were sufficient ICB needs in the state to warrant increased involvement by the State in ICB. DRPT conducted a follow-up study in 2014 that specifically investigated potential ICB routes and schedules, including modeling ridership, revenue, and other operational factors. This follow-up study was the basis for establishing the first Virginia Breeze line (now referred to as the Valley Flyer) and has been used alongside follow-up analyses as the basis for establishing new routes.

#### **4.1.2. Program Management**

Megabus was selected as the provider for Virginia Breeze through a competitive selection process where ICB companies submitted proposals. Megabus was chosen based on its flexibility regarding branding and stop location at the time of selection. Megabus was willing to rebrand its existing buses with Virginia Breeze's branding. Additionally, DRPT plays a determinative role in ICB stop location and facilitates discussions with municipalities, transit agencies, and others to ensure adequate facility access.

DRPT also has significant power over the level of service provided, including daily operations. The DRPT program manager sets fares and assists with day-to-day customer

service needs. The program manager also has access to detailed ticketing information, including current bus loads, to identify and decide when additional vehicles are put into service to meet passenger demands. Ten (10) vehicles in operation at a time is typical for the DRPT service.

DRPT funds Virginia Breeze using its 15 percent 5311(f) set aside, including both operations and associated planning efforts. Between 5311(f) and the various COVID-19 relief programs instituted by the federal program (e.g., CARES), ICB funding currently exceeds annual Virginia Breeze expenses. However, the agency expects that this will not be the case in the future as COVID-relief funds run out and needs evolve. The DRPT annual 5311 apportionment, excluding the 15 percent 5311(f) set-aside, is not currently fully utilized, nor has it typically been in the past.

DRPT currently plans to petition for state funding to meet ongoing needs should current ICB/rural transit needs exceed current funding levels. Virginia Breeze's annual expenses are approximately \$2.9 million, with local match obtained from in-kind service provided by Megabus.

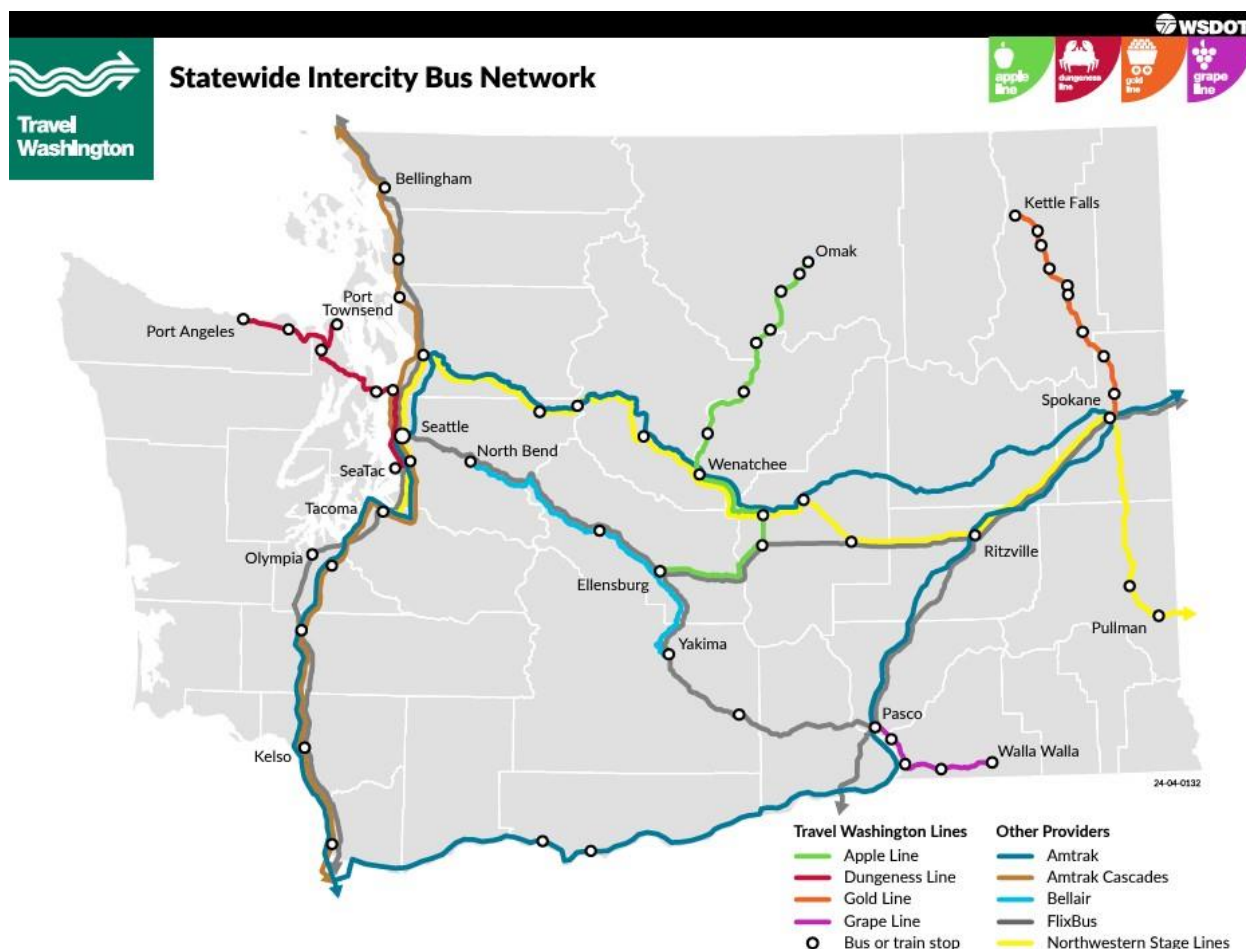
One program manager is responsible for managing the Virginia Breeze program. Depending on the level of involvement, one (1) staff member is sufficient to manage a statewide ICB program, although two (2) staff members may be necessary at high involvement levels. At DRPT, marketing is managed by internal staff that is not exclusively dedicated to Virginia Breeze, with the creation of specific marketing materials contracted out as necessary.

## **4.2. Washington Department of Transportation**

### **4.2.1. Program History**

The Washington Department of Transportation (WSDOT) funds and manages the Travel Washington bus service, a statewide ICB service operating within Washington state lines. **Figure 4-2** below displays the four routes currently operating, all of which travel reduced distances compared to the routes operated by regional and nationwide carriers. In 2007, Travel Washington began with the Grape Line but has since added three (3) routes and is piloting two (2) additional routes.

Figure 4-2: Travel Washington Route Map (Source: WSDOT)



A 2006 ICB needs assessment identified unmet needs throughout Washington, concluding that a statewide ICB program was necessary and identified potential routes to consider. A follow-up implementation plan was completed in 2007, which focused on developing specific projects to link rural portions of Washington to the greater ICB network.

At the inception of the Travel Washington program, WSDOT owned the vehicles themselves and allowed providers to use them. Since then, WSDOT no longer owns vehicles; ICB providers are to provide vehicles and build vehicle-related costs into their cost estimate when bidding for a Travel Washington route.

#### 4.2.2. Program Management

WSDOT bids Travel Washington routes out individually through a competitive selection process, including cost and customer service, to holistically evaluate each bid received. Three (3) providers currently operate the Travel Washington routes: Northwest Trailways, Greyhound, and Belair Charters via Central Washington Airporter. Vehicles carry the Travel Washington brand and the branding specific to their operating route. WSDOT plays a determinative role in stop location and selection, enforced through the bidding and

contracting process. Internally, WSDOT has minimal involvement in the daily bus operations for Travel Washington.

Private providers bidding for a Travel Washington route must establish costs on a cost-per-mile operated basis, which includes Washington-specific costs. For example, staffing and vehicle acquisition specifically for operating a Travel Washington route must be rolled into the cost per mile quoted to WSDOT. Travel Washington's annual expenses are approximately \$2.3 million for the four (4) primary routes and \$800,000 per year for the two (2) trial routes funded through COVID-relief sources.

WSDOT engages heavily with DOTs from surrounding states, such as Idaho and Oregon, regarding ICB service. Travel Washington's program manager and their counterparts in surrounding states regularly meet to share information and address current ICB challenges. For example, in establishing an ICB route to serve Washington and Oregon, WSDOT and the Oregon DOT agreed on which agency would provide operating subsidy to the route and how responsibility for respective subsidy levels would be determined.

Interstate coordination also enables WSDOT to ensure compliance among participants in the Travel Washington program, specifically regarding in-kind matches. WSDOT relies heavily upon agreements with private ICB providers to use their unsubsidized service as in-kind match for the Travel Washington program. In addition to obtaining agreement from private providers that their in-kind service will remain unsubsidized, coordination with surrounding DOTs acts as a secondary check that this is the case.

Travel Washington's program manager is involved in facilities access discussions with transit agencies, municipalities, and other stakeholders. WSDOT communicates its ambition for success and benefits of Travel Washington to decision-makers controlling facilities access to address reservations regarding collaborating with ICB providers.

WSDOT funds Travel Washington using its 15 percent 5311(f) set aside, including operations and associated planning efforts. WSDOT does not currently spend the entirety of its annual apportionment on Travel Washington; instead, the agency preserves leftover funding for subsequent years and declines to petition the governor for governor's certification. WSDOT's annual 5311 apportionments, excluding the 15 percent 5311(f) set aside, is not fully utilized, which is consistent with previous annual utilization.

## 5. Current Levels of Service

To evaluate trends in intercity bus service provision across the state of Tennessee, TDOT has evaluated the change over time in the number and frequency of intercity bus routes, as well as the changes in stop locations. This analysis was conducted for stop locations and routes between 2015 and existing service in 2024. The main sources of information for this assessment included intercity bus provider websites, previous TDOT intercity bus needs assessments, data provided by intercity bus providers, and websites with publicly available data, such as the North American Bus Timetables and Transcor Data Services, which collects intercity bus timetables directly from providers.

A sub-section discussing historical findings regarding feeder service in previous intercity bus needs assessment is located in section 5.2.

### 5.1. Existing Intercity Bus Service

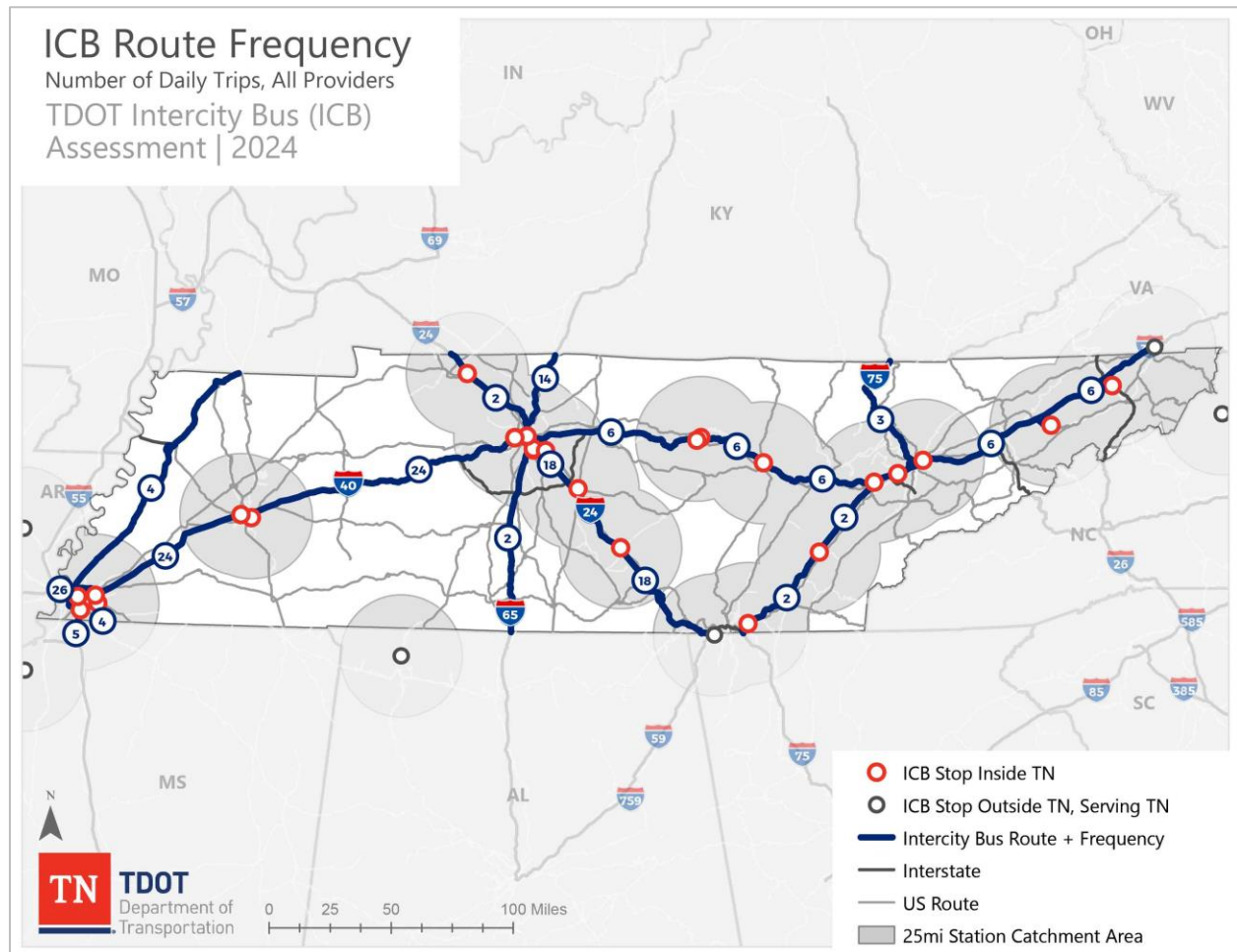
#### 5.1.1. Existing Intercity Bus Routes and Stops

Tennessee is currently served by seven (7) interlining and non-interlining providers, meaning providers with varying levels of explicit service coordination, such as co-locating stops in the same city and allowing single tickets to be purchased on other providers ticketing platforms regardless of separate trip legs and transfers. The seven providers identified as operating services in Tennessee include Greyhound Lines ("Greyhound"), Delta Bus Lines ("Delta"), Jefferson Lines ("Jefferson"), Tornado Bus Company ("Tornado"), Panda NY Bus ("Panda NY"), Wanda Coach ("Wanda"), and Vonlane.

**Figure 5-1** below displays the routes, stop locations, and daily one-way trip frequencies for all seven (7) intercity bus providers combined. Additionally, 25-mile catchment areas illustrate the approximate area served by each intercity bus stop. One-way trip frequencies represent the number of buses traversing each portion of the roadway per day in either direction. Since the number of trips operated by some providers varies daily or is less than one (1) trip per day, frequencies are represented in the maximum number of buses traversing a segment throughout the week.

The vast majority of interstate highway miles in Tennessee carry intercity buses, with the exception of I-26 and I-40 between I-81 and the North Carolina/Tennessee state border. The highest trip frequencies are on I-40 between Memphis and Arkansas/Tennessee state border (26 trips), I-40 between Nashville and Memphis (24 daily trips), and I-24 between Nashville and Wildwood, Georgia/Chattanooga (18 Trips). US-51 between Memphis and the Kentucky/Tennessee state border carries four (4) Greyhound trips per day, although Greyhound does not stop in any Tennessee communities along this corridor aside from Memphis.

*Figure 5-1: ICB Route Frequency, All Providers*



### 5.1.2. Historical Intercity Bus Service Trends

TDOT examined previous intercity bus needs assessments (2015, 2018, and 2021) to identify historical service and route locations in Tennessee to compare with current routes and stop locations. Note that previous assessments excluded non-interlining providers from key portions of their analysis and thus often do not have the same level of detail as discussion related to interlining providers. Greyhound, Delta, and Miller Transportation ("Miller") have consistently interlined their services since 2015 and are thus discussed together, while separate analyses are provided for non-interlining providers.

### 5.1.3. Interlining Providers – Bus Stops

**Table 5-1** and **Figure 5-2** below summarize before (2015) and after (2024) stop locations in Tennessee for interlining providers, with historical context for service cuts made between each intercity bus needs assessment provided.

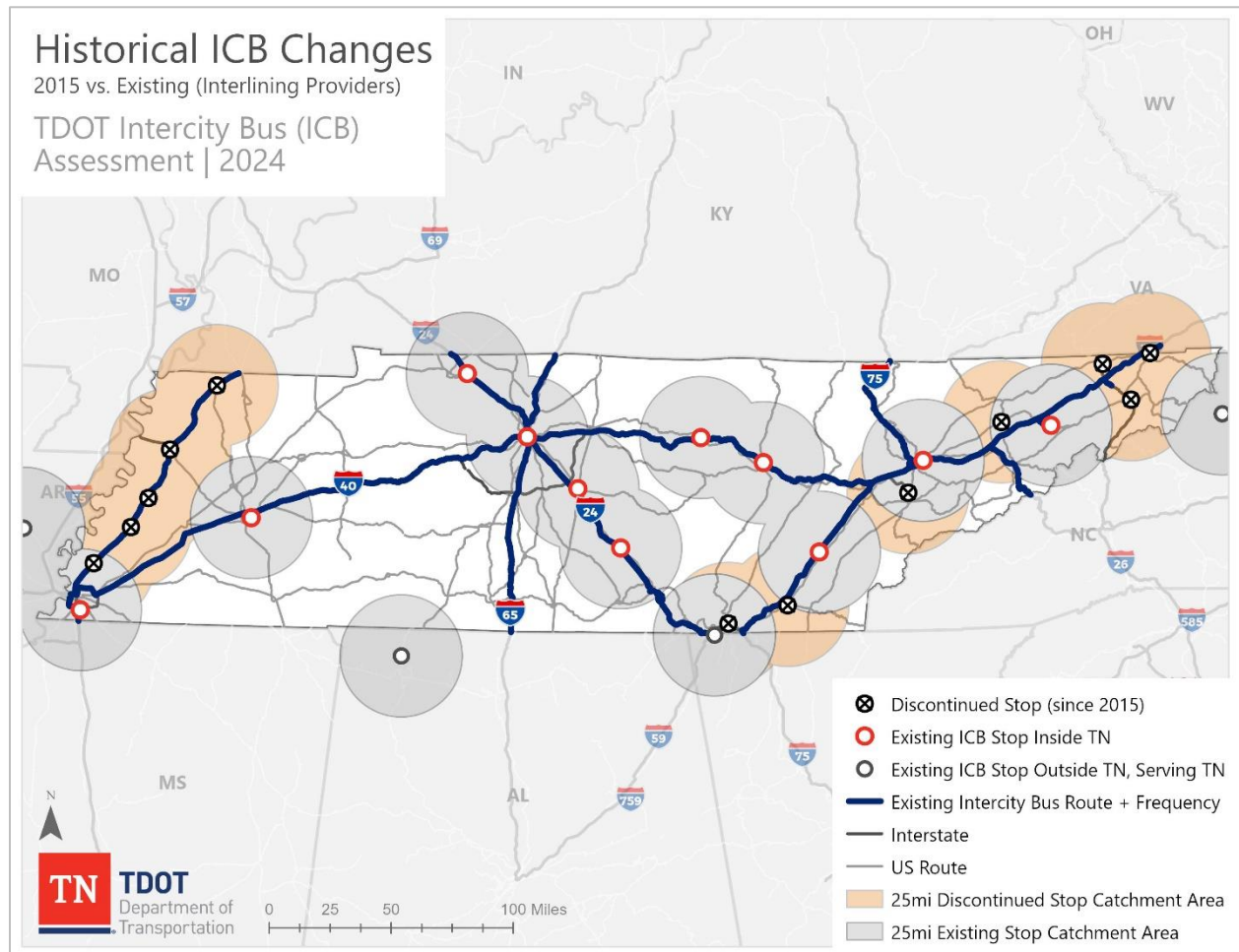
*Table 5-1: Interlined Provider Bus Stop Comparison, 2015 vs. 2024*

City	2015			2024		
	Greyhound	Delta	Miller	Greyhound	Delta	Miller
Athens						
Bristol						
Chattanooga						
Clarksville						
Cleveland						
Cookeville						
Covington						
Crossville						
Dyersburg						
Greeneville						
Jackson						
Johnson City						
Kingsport						
Knoxville						
Knoxville(McGhee Tyson Airport)						
Manchester						
Memphis						
Millington						
Morristown						
Murfreesboro						
Nashville						
Ripley						
Union City						
Wildwood, Georgia*						

Served by Greyhound	Served by Delta	Served by Miller
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\* Greyhound stop relocated from Chattanooga to Wildwood, Georgia.

*Figure 5-2: Historical ICB Bus Stop Changes, 2015 vs. 2024*



Interlining service has steadily declined in Tennessee in terms of the number of stops served. The 2018 intercity bus needs assessment identified nineteen (19) cities as being serviced by ICB providers, with a reduction of four (4) stops compared to 2015: Kingsport, Millington, Ripley, and Tyson McGhee Airport in Knoxville. No new cities were identified as receiving service since the 2015 study. The cities retaining service were Athens, Bristol, Chattanooga, Clarksville, Cleveland, Cookeville, Covington, Crossville, Dyersburg, Greenville, Jackson, Johnson City, Knoxville, Manchester, Memphis, Morristown, Murfreesboro, Nashville, and Union City.

The 2021 ICB study identified eighteen (18) cities as being serviced by ICB providers, representing a reduction of one (1) stop (Morristown) from the 2018 study. No new cities were identified as receiving service since the 2015 study. The cities retaining service were Athens, Bristol, Chattanooga, Clarksville, Cleveland, Cookeville, Covington, Crossville, Dyersburg, Greenville, Jackson, Johnson City, Knoxville, Manchester, Memphis, Murfreesboro, Nashville, and Union City.

Since 2021, the number of Tennessee cities served further decreased from eighteen (18) to eleven (11), with an additional twelfth city accounting for Wildwood, Georgia, to which Greyhound relocated its Chattanooga stop. Miller has since reduced its Tennessee operations to only stopping in Memphis. In combination with Greyhound closing its stops in Covington, Dyersburg, and Union City, due to the pandemic, this corridor only has a stop in Memphis despite Greyhound still running, serving along US-51 into Paducah, Kentucky. Eastern Tennessee was also heavily impacted by pandemic-related stop closures, including the closure of Greyhound stops in Bristol, Cleveland, and Johnson City.

#### **5.1.4. Interlining Providers – Tables and Schedules**

**Table 5-2** below summarizes before (2015) and after (2024) table<sup>1</sup> and schedule<sup>2</sup> counts operated by Greyhound and Miller in Tennessee. The 2015 table and schedule information was obtained from the 2015 Tennessee intercity bus needs assessment, which excluded Delta from its analysis due to Delta's service only consisting of a short segment from Memphis south to Mississippi. This analysis also excludes Delta to enable direct comparison with 2015 service levels. 2024 Greyhound table and schedule counts were obtained from Greyhound directly. **Table 5-2** only includes Greyhound tables and schedules that could be verified using Greyhound's website. Greyhound table 427, which includes schedules 1520, 3620, 3641, and 1541, could not be verified and are thus excluded.

Between 2015 and 2024, the number of tables operated by interlining carriers in Tennessee decreased from eleven (11) to seven (7), while the number of schedules decreased from eighty-six (86) to thirty-eight (38), or approximately 42 percent of 2015 service levels. Note that Greyhound is still suffering decreased service levels due to the COVID-19 pandemic, thus, service levels directly prior to the pandemic may be more favorable compared to 2015. As noted previously, Miller has ceased all Tennessee operations.

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<sup>1</sup> A table corresponds to an intercity bus route which includes stops that may or may not be served.

<sup>2</sup> A schedule corresponds to stops served and associated arrival/departure times in a table.

*Table 5-2: Interlined Provider Table and Schedule Comparison, 2015 vs. 2024*

2015				2024 (Existing)			
Carrier	Table	# of SB Schedules*	# of NB Schedules*	Carrier	Table	# of SB/EB Schedules	# of NB/WB Schedules
Greyhound	144	3	3	Greyhound	144	1	1
Greyhound	280	3	4	Greyhound	280	1	1
Greyhound	426	3	2	Greyhound	426	1	1
Greyhound	427	1	1	Greyhound	438	5	5
Greyhound	433	3	3	Greyhound	444	6	6
Greyhound	435	1	1	Greyhound	445	1	1
Greyhound	438	8	8	Greyhound	478	4	4
Greyhound	444	10	10				
Greyhound	445	5	5				
Greyhound	478	5	5				
Miller	2503	1	1				
<b>Total</b>	<b>11</b>	<b>43</b>	<b>43</b>	<b>Total</b>	<b>7</b>	<b>19</b>	<b>19</b>

\* The 2015 intercity bus needs assessment labels schedules as either northbound or southbound, regardless of whether travel is eastbound or westbound.

### 5.1.5. Non-Interlining Providers

Tennessee is also served by at least six (6) non-interlining providers, meaning that while they may stop in cities served by the greater intercity bus network, they generally do not co-locate with other providers, nor do they allow ticket sales on each other's ticketing platforms. These providers include Jefferson, Tornado, Panda NY, Wanda Coach, Vonlane, and New York to Tennessee Bus.

Brief descriptions of the current state of non-interlining services are provided below:

**Jefferson Lines** currently only operates out of Memphis, with connections to its greater network of routes in the central and western United States. States served include Arkansas, Idaho, Iowa, Kansas, Minnesota, Missouri, Montana, Nebraska, North Dakota, Oklahoma, South Dakota, Tennessee, Washington, Wisconsin, and Wyoming.

**Tornado Bus Company** primarily operates in Mexico, the southern United States, and out of Illinois and Indiana, and it is mainly focused on Spanish-speaking customers. States served include Florida, Georgia, Indiana, Illinois, Kansas, North Carolina, Texas, and Tennessee. In Tennessee, Tornado has stops in Nashville and Jackson. Tornado also has a stop in West Memphis, Arkansas.

**Vonlane** bills itself as a luxury intercity bus provider, providing trips between Memphis and Nashville and between Nashville and Atlanta.

**New York to Tennessee Bus, Panda NY, and Wanda Coach** all specifically operate trips connecting southern cities to New York City. **Table 5-3** below summarizes the Tennessee cities served by these three providers.

*Table 5-3: New York to Tennessee Bus, Panda NY, Wanda Coach Stop Comparison, 2015 vs. 2024*

City	Non-Interlining Provider		
	New York to Tennessee Bus	Panda NY	Wanda Coach
Chattanooga			
Cookeville			
Jackson			
Johnson City			
Knoxville			
Memphis			
Nashville			

Served by New York to Tennessee Bus	Served by Panda NY	Served by Wanda Coach
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Previous Tennessee intercity bus assessments vary in how much detail they provide on non-interlining providers if they are discussed at all. As a result, the specific service histories of some non-interlining providers could not be identified. The 2018 needs assessment shows that the status of non-interlining providers in Tennessee varies. In comparison to 2024, the following changes have occurred among non-interlining providers:

**Bus Ticket, Inc.** and **Megabus** have ceased operations in Tennessee.

**Tornado** no longer operates a stop in Dickson, Tennessee, but now serves Nashville.

**Vonlane** and **Panda NY** are new providers in Tennessee relative to the 2018 needs assessment.

**New York to Tennessee Bus** added service in Cookeville.

#### 5.1.6. Historical Feeder Service Trends

The 2015 assessment documented that nine (9) of the state's rural transit agencies provided feeder service to intercity bus stops in at least twelve (12) cities statewide. As summarized in **Figure 5-3** below, these trips were generally provided through deviated fixed routes or general public demand responsive services.

*Figure 5-3: Feeder Services Identified in 2015 Needs Assessment*

Rural Transit Agency	Intercity Bus Stations/Stops Served	Days of Service	Service Type
Delta HRA	Jackson, Memphis	Monday - Friday	GPDR
East Tennessee HRA	Bristol, Greeneville, Johnson City, Kingsport, Knoxville, Morristown	Monday - Saturday	GPDR
First Tennessee HRA	Bristol, Greeneville, Johnson City, Kingsport	Monday - Friday	DFR, GPDR
Mid-Cumberland HRA	Clarksville, Murfreesboro, Nashville	Monday - Friday	GPDR
Northwest Tennessee HRA	Jackson, Memphis, Nashville	Monday - Friday	DFR, GPDR
South Central TDD	Chattanooga, Murfreesboro, Nashville,	Monday - Friday	GPDR
Southeast HRA	Chattanooga	Monday - Friday	DFR
Southwest HRA	All Stations/Stops	Monday - Friday	GPDR
Upper-Cumberland	Chattanooga, Cookeville, Knoxville, Murfreesboro, Nashville	Monday - Friday	DFR, GPDR

DFR=Deviated Fixed Route; GPDR=General Public Demand Response

Source: 2015 TDOT Intercity Bus Needs Assessment

The 2018 study only identified two (2) rural providers of intercity bus feeder service. This change was likely made to distinguish between services provided with the express purpose of connecting with ICB providers and those demand response trips that are infrequent or incidental to ICB connection. The Upper Cumberland Human Resource Agency (UCHRA) was identified as providing the Nashville I-40 Express with stops in Silver Point, Carthage, and Lebanon, designed to connect these and other small communities with Greyhound stations. UCHRA also ran the I-24 Express Bus, with stops in Centertown, Woodbury, Kittrell, and Murfreesboro. Both of these routes are still run by UCHRA, as discussed previously.

As of 2021, all three (3) previously identified feeder routes (Nashville I-40 Express, I-24 Express, and Lawrenceburg SCATS) were still in operation. According to TDOT's 2020 ICB CARES Act Report, UCHRA indicated a 60 to 79 percent revenue loss but no service cuts. When ridership declined, UCHRA reduced routes to two (2) per day but reinstated service when demands increased. UCHRA offers three (3) I-40 Express routes per day and two (2) I-24 Express routes per day, as indicated by their publicly available schedule dated May 2021. The Lawrenceburg SCATS routes run on a regular schedule and connect to the Nashville and Murfreesboro Greyhound stations. The Nashville service runs two (2) routes per day on Monday, Tuesday, Thursday, and Friday; the Murfreesboro service runs one (1) route per day on Wednesday.

## 5.2. Feeder Service Evaluation

### 5.2.1. Feeder Service 5311(f) Program Requirements

The coordination of rural connections between small transit operations and intercity bus carriers may include the provision of service that acts as a feeder to intercity bus service and makes meaningful connections with scheduled intercity bus service to more distant points. The feeder service is not required to have the same characteristics as the intercity service with which it connects. For example, feeder service may be demand-responsive, while intercity service is fixed route. Service that only incidentally stops at an intercity bus facility among other destinations within the city at either end of a route that covers a long distance, without regard to scheduled connections, is eligible for Section 5311 assistance as public transportation but is not an intercity feeder service<sup>3</sup>.

Feeder routes can use 5311(f) in-kind local match funds to “fill in gaps” in service. States may use the capital costs incurred by unsubsidized, privately operated mainline intercity bus routes as the in-kind local match for the operating costs of connecting rural intercity bus feeder service. The unsubsidized private operator costs can be used as the local match only if the private operator agrees in writing to the use of the costs of the private operator for the unsubsidized segment of intercity bus service as an in-kind match. To be eligible under 5311(f), the net project costs contributed by the private operator as in-kind match must connect the rural community to key destinations. This type of funding mechanism is authorized under Section 5311(g)(3)(d). The feeder services run by rural transit providers in Tennessee do not use this funding source and instead, use a portion of their regular 5311 funding to operate their feeder service.

### 5.2.2. Eligibility Evaluation of Potential Feeder Services

Feeder service is a form of intercity bus service, as outlined in FTA Circular 9040.1G, with the purpose of providing connections between small transit operations and intercity bus carriers via rural areas. Similar to intercity bus service itself, feeder service must make meaningful connections to other intercity bus services, meaning within a very close distance and within a short period of time. Feeder service may be fixed-route or demand-response and may be provided by transit agencies or contracted for by the State.

Feeder service can play a critical role in maintaining the health of the overall intercity bus network, including by providing shorter trips and feeding passengers into the more extensive network that goes beyond state lines.

To evaluate potential feeder services in Tennessee, the study team asked rural transit agencies to indicate if they provide service that might qualify as feeder service in the Stakeholder Survey. The study team then met individually with rural transit agencies to

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<sup>3</sup> FTA Circular 9040.1G,  
[https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA\\_Circular\\_9040\\_1Gwith\\_index\\_-\\_Final\\_Revised\\_-\\_vm\\_10-15-14%281%29.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Circular_9040_1Gwith_index_-_Final_Revised_-_vm_10-15-14%281%29.pdf)

gather more information if they indicated they might be currently providing feeder service. Information gathered from rural transit agencies is summarized below, which is used to evaluate the eligibility of these services for intercity bus funding and any alterations to the service that would need to be made to make the service eligible.

### 5.2.3. Upper Cumberland Human Resources Agency (UCHRA)

This section contains a description of services provided by UCHRA that may qualify as feeder service, an analysis of each service regarding its eligibility for intercity bus funding, and any service alterations that would need to be made to make each service eligible.

#### *McMinnville to Nashville via I-24 and US-70S (I-24 Express Bus)*

##### Service Description

UCHRA's McMinnville to Nashville service includes two (2) trips in both directions for a total of four (4) trips, Monday through Friday, serving Centertown (Warren County), Woodbury (Cannon County), Kittrell (Rutherford County), Murfreesboro (Rutherford County), and Nashville International Airport as intermediate stops. In McMinnville, it operates out of UCHRA's Warren County office<sup>4</sup>, while in Nashville, it operates out of WeGo Central. However, it does not have a dedicated bay to pick up or unload passengers. Upon request, UCHRA drivers will take passengers to nearby street corners or businesses that are near their final destination, although drop-off at private residences is generally disallowed. **Table 5-4** and **Table 5-5** below shows the stops and departure times for outbound and inbound trips of the I-24 Express Bus, respectively.

*Table 5-4: I-24 Express Bus Outbound Departure Times*

<b>I-24 Express Bus Outbound Departure Times</b>		
<b>Stop Locations</b>	<b>Bus 1</b>	<b>Bus 2</b>
McMinnville, UCHRA Warren County Office	6:00 AM	11:00 AM
Centertown, Dollar General	6:15 AM	11:15 AM
Woodbury, Hardee's	6:30 AM	11:30 AM
Kittrell, Church of Christ	6:45 AM	11:45 AM
Murfreesboro	7:00 AM	12:00 PM
Nashville International Airport (to Downtown Nashville)	8:00 AM	12:30 PM

<sup>4</sup> 201 Locust St. #16, McMinnville, TN 37110

*Table 5-5: I-24 Express Bus Inbound Departure Times*

<b>I-24 Express Bus Inbound Departure Times</b>		
<b>Stop Locations</b>	<b>Bus 1</b>	<b>Bus 2</b>
Downtown Nashville	11:00 AM	4:00 PM
Nashville International Airport	11:30 AM	4:30 PM
Murfreesboro	12:30 PM	5:00 PM
Kittrell, Church of Christ	1:00 PM	5:30 PM
Woodbury, Hardee's	1:15 PM	5:45 PM
Centertown, Dollar General (to UCHRA Warren County Office in McMinnville)	1:30 PM	6:00 PM

### Eligibility Evaluation

This service generally meets most FTA requirements for feeder service. The scheduled arrival time of both buses at WeGo Central is within a short period of time for multiple scheduled Greyhound bus departures. While Greyhound trips do not depart directly from WeGo Central, multiple WeGo bus routes serve the Greyhound Station on Rep. John Lewis Way, providing ample time to take a bus from WeGo Central to the Greyhound Station.

This service largely operates on a regular timetable with fixed stop locations. However, the fact that UCHRA drivers will take passengers to specific, requested locations may indicate that this service runs outside of the FTA requirement that intercity feeder connections not be incidental in nature. Miles operated in deviated service may not be eligible as feeder service, while miles operated along the fixed-route portion may be eligible as feeder service.

Likewise, the lack of a direct connection in an area with a large Greyhound bus station may indicate that any intercity bus connections are incidental despite transit connections being readily available.

### Service Alterations

It is unclear if this service qualifies as a feeder service, given that passengers can request to deviate from the route, which may indicate that intercity bus connections are incidental. Prior to making service alterations, consultation with TDOT and FTA is an appropriate initial step to determine feeder service eligibility.

Disallowing deviation would bring this service in closer alignment with the definition of feeder service, converting it to a typical fixed-route service and increasing the likelihood that 5311(f) funds could be utilized for this service. Additionally, adding a stop at the Greyhound Bus Station would help demonstrate that intercity bus access is a primary purpose of this route.

Should TDOT and UCHRA wish to use 5311(f) funding for this service without disallowing deviation within Nashville, it may be necessary to leverage 5311 and 5311(f) separately. For example, miles operated in deviated service upon a passenger request may utilize 5311 funding, while miles operated along the fixed-route portion may utilize 5311(f).

### *Murfreesboro/VA Express*

#### Service Description

UCHRA's Murfreesboro/VA Express service includes two (2) trips per day in both directions for a total of four (4) trips, Monday through Friday. In McMinnville, it operates out of UCHRA's Warren County office, while in Murfreesboro, it operates out of the Alvin C. York VA Medical Center, with an intermediate stop at UCHRA's Cannon County office.

#### Eligibility Evaluation

This service's alignment with feeder service requirements is unclear. This service operates on a fixed, regular timetable. Passengers can ride a Murfreesboro Transit route from the VA Medical Center to a stop that is a half-mile walk from the Murfreesboro Greyhound bus stop. Additionally, the total travel distance from the VA Medical Center to the Greyhound stop is more than five (5) miles, with total travel time exceeding thirty (30) minutes. No explicit public transit connection time or distance requirement exists; thus, judgment on the part of the FTA or TDOT may determine the eligibility of this service with regard to accessibility via transit.

Given current Greyhound schedules operating out of Murfreesboro, it is unclear if the time periods between alighting from UCHRA's service in Murfreesboro and Greyhound departures are short enough, given that they vary from one (1) to thirteen (13) hours. This is compounded by the lack of specific requirements for the length of feeder service connection times.

#### Service Alterations

As there is no clear standard regarding feeder service connection times or distances, consultation with FTA to determine a possible "rule of thumb" may be necessary. TDOT should also consider establishing a reasonable standard by which potential Feeder services can be evaluated as "meaningful" or not.

Altering the route to include an intermediate stop at the Greyhound stop, or a close location would more closely align this service with the feeder service eligibility standards by demonstrating that intercity bus connections are a core purpose of this route. Similarly, changing the timing of existing runs or adding new runs to shorten the time between alighting from UCHRA's service and Greyhound departures would strengthen the nexus between UCHRA's service and Greyhound's service. When adding new runs, the timing of intercity bus connections should be considered, as new runs may not be feeder service-eligible if the connection times are not "meaningful."

## *Cookeville to Nashville via I-40 (I-40 Express Bus)*

### Service Description

UCHRA's Cookeville to Nashville service includes three (3) trips in both directions for a total of six (6) trips each weekday, serving Silver Point (Putnam County), Carthage (Smith County), Lebanon (Wilson County), and the Nashville International Airport as intermediate stops. In Cookeville, it operates out of the Cookeville Transit Hub/Greyhound Station; in Nashville, it operates out of the Nashville Greyhound Bus Station, WeGo Central, and the Nashville International Airport. Upon request, UCHRA drivers will take passengers to nearby street corners or businesses near their final destination, although drop-off at private residences is generally disallowed. UCHRA's Cookeville Transit Hub is the transfer point for all UCHRA passengers wishing to use this service. **Table 5-6** and **Table 5-7** below show the stops and departure times for outbound and inbound trips of the I-40 Express Bus, respectively.

*Table 5-6: I-40 Express Bus Outbound Departure Times*

<b>I-40 Express Bus Outbound Departure Times</b>			
<b>Stop Locations</b>	<b>Bus 1</b>	<b>Bus 2</b>	<b>Bus 3</b>
Cookeville Transit Hub/Greyhound Station	6:00 AM	9:00 AM	12:00 PM
I-40 Exit 273, Silver Point (Putnam County)	6:20 AM	9:20 AM	12:20 PM
I-40 Exit 258, Carthage (Smith County)	6:40 AM	9:40 AM	12:40 PM
I-40 Exit 238, Lebanon (Wilson County)	7:00 AM	10:00 AM	1:00 PM
Nashville International Airport (on request)	7:30 AM	10:30 AM	1:30 PM
Nashville Greyhound Bus Station (on request)	8:00 AM	11:00 AM	2:00 PM

*Table 5-7: I-40 Express Bus Inbound Departure Times*

<b>I-40 Express Bus Inbound Departure Times</b>			
<b>Stop Locations</b>	<b>Bus 1</b>	<b>Bus 2</b>	<b>Bus 3</b>
Nashville Greyhound Bus Station (on request)	10:30 AM	1:30 PM	4:30 PM
Nashville International Airport (on request)	11:00 AM	2:00 PM	5:00 PM
I-40 Exit 238, Lebanon (Wilson County)	11:30 AM	2:30 PM	5:30 PM
I-40 Exit 258, Carthage (Smith County)	11:50 AM	2:50 PM	5:50 PM
I-40 Exit 273, Silver Point (Putnam County)	12:10 PM	3:10 PM	6:10 PM
Cookeville Transit Hub/Greyhound Station	12:30 PM	3:30 PM	6:30 PM

### Eligibility Evaluation

This service generally meets most FTA requirements for feeder service. The scheduled arrival time of multiple buses at WeGo Central and the Cookeville Transit Hub/Greyhound Station are within a short period of time of multiple scheduled Greyhound bus departures. While Greyhound trips do not depart directly from WeGo Central, multiple WeGo bus routes serve the Greyhound Station on Rep. John Lewis Way, providing ample time to

take a bus from WeGo Central to the Greyhound Station. In Cookeville, there is a direct connection with Greyhound's service operating out of the Cookeville Transit Hub.

This service primarily operates on a regular timetable with fixed stop locations. However, the fact that UCHRA drivers will take passengers to specific, requested locations may indicate that this service runs outside of FTA requirements that intercity feeder connections are not incidental in nature. Miles operated in deviated service may not be eligible as feeder service, while miles operated along the fixed-route portion may be eligible as feeder service.

Likewise, the lack of a direct connection in an area with a large Greyhound bus station may indicate that intercity bus connections are incidental despite readily available transit connections.

### Service Alterations

It is unclear if this service qualifies as feeder service, given that passengers can request to deviate from the route, which may indicate that intercity bus connections are incidental. Before making service alterations, consultation with FTA is an appropriate initial step to determine feeder service eligibility.

Disallowing deviation would bring this service in closer alignment with the definition of feeder service, converting it to a typical fixed-route service and increasing the likelihood that 5311(f) funds could be utilized for this service. Additionally, adding a stop at the Greyhound Bus Station in Nashville would help demonstrate that intercity bus access is a primary purpose of this route.

Should TDOT and UCHRA wish to use 5311(f) funding for this service without disallowing deviation within Nashville, it may be necessary to leverage 5311 and 5311(f) separately. For example, miles operated in deviated service upon a passenger request may utilize 5311 funding, while miles operated along the fixed-route portion may utilize 5311(f).

### *Crossville to Knoxville via I-40*

#### Service Description

UCHRA's Crossville to Knoxville service includes one (1) trip in each direction on Mondays, Wednesdays, and Fridays, serving no fixed, intermediate stops, though passengers can request drop-off along the route. In Crossville, it operates out of the UCHRA Cumberland County office<sup>5</sup>, while in Knoxville, it operates out of the Knoxville Airport (McGhee Tyson Airport).

#### Eligibility Evaluation

This route is unlikely to qualify as feeder service, given that it operates on a deviated-fixed-route model, where route termini are fixed but intermediate stops are based on passenger requests. While the Crossville Greyhound stop is close to UCHRA's Cumberland

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<sup>5</sup> 1720 West Ave, Crossville, TN 38555

County office and may be along the route itself, no connection is made unless customers request it. Similarly, no intercity bus service is provided at McGhee Tyson Airport. As a result, trips taken on this route, unless a specific request is made to stop at a Greyhound location, may be incidentally related to intercity bus but is more likely to be unrelated.

### Service Alterations

This route would likely need to be converted to a traditional fixed-route model with regular, scheduled stops, including one (1) at the Greyhound stop in Crossville itself, to qualify as feeder service. Doing so would demonstrate that intercity bus connections are a primary purpose of this route.

If a deviated-fixed-route model is maintained, it may be necessary to leverage 5311 and 5311(f) separately. For example, a trip where a passenger(s) requests deviation to a Greyhound stop may utilize 5311(f) funding, while deviations to other destinations would utilize 5311 funding.

### *Lafayette to Nashville via Hwy. 52 and US-31E South*

#### Service Description

UCHRA's Lafayette to Nashville service includes one (1) trip in each direction on Monday through Friday, serving Gallatin as an intermediate stop. In Lafayette (Macon County), it operates out of UCHRA's Macon County office.<sup>6</sup> In Nashville, it operates out of WeGo Central, the Greyhound Bus Terminal, and Nashville International Airport. Upon request, UCHRA drivers will take passengers to nearby street corners or businesses near their final destination, although drop-off at private residences is generally disallowed.

#### Eligibility Evaluation

It is not clear if this route would qualify as feeder service. While this route operates on a fixed timetable with fixed stops, including a direct connection at the Greyhound Bus terminal in Nashville, the fact that customers can request to deviate to near their final destination may disqualify all or some of the service provided on this route. In one scenario, deviated services may be required to use 5311 funding (especially if not deviated to intercity bus stops), whereas miles operated along the fixed-route portion may be funded through 5311(f). Alternatively, none of the miles operated on this route may qualify as feeder service, as the ability to deviate so changes the character and purpose of this route that it has little nexus with intercity bus.

#### Service Alterations

As discussed before, this service may not need to be altered for portions of miles operated to qualify as feeder service, particularly the fixed portions of the route. In this scenario, the deviated portions of the route would utilize 5311 funding.

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<sup>6</sup> 607 TN-52 Bypass, Lafayette, TN 37083

That said, it is unclear whether this route qualifies as feeder service, at least in part. Converting this route to a traditional fixed-route model while maintaining the Greyhound Bus Terminal stop in Nashville would clearly align this route with the FTA's feeder service requirements.

#### 5.2.4. South Central Tennessee Development District (SCTDD)

This section contains a description of services provided by SCTDD that may qualify as feeder service, an analysis of each service regarding its eligibility for intercity bus funding, and any service alterations that would need to be made to make each service eligible. SCTDD's public transit services are branded as SCATS or South Central Area Transit Services.

##### *Lawrence County SCATS – Nashville Route*

###### Service Description

This service includes two (2) trips in each direction, Monday through Friday, between Leoma/Loretto and Nashville. Intermediate stops include Lawrenceburg, Ethridge, Summertown, Mt. Pleasant, Columbia, and Spring Hill or Franklin (upon request on inbound trips). In Nashville, this route operates out of the Greyhound Bus Station. Aside from service to Spring Hill and Franklin, it is unclear to what extent vehicles will deviate to pick up or drop off passengers. **Table 5-8** and **Table 5-9** below shows the stops and departure times for outbound and inbound trips of the SCATS Nashville Route, respectively.

*Table 5-8: SCATS Nashville Route Outbound Departure Times*

SCATS Nashville Route Outbound Departure Times		
Stop Locations	Bus 1	Bus 2
Leoma/Loretto (Archive Building)	6:30 AM	11:30 AM
Lawrenceburg (Career Center)	6:45 AM	11:45 AM
Ethridge (Amish Stop)	7:15 AM	12:15 PM
Summertown (Super Rama)	7:30 AM	12:30 PM
Mt. Pleasant (Rite Aid)	7:45 AM	12:45 PM
Columbia (McDonalds Bear Creek)	8:00 AM	1:15 PM
Spring Hill/Franklin	Upon Request	

*Table 5-9: SCATS Nashville Route Inbound Departure Times*

<b>SCATS Nashville Route Inbound Departure Times</b>		
<b>Stop Locations</b>	<b>Bus 1</b>	<b>Bus 2</b>
Nashville/Greyhound	12:00 PM	4:30 PM
Columbia (McDonald's Bear Creek)	1:30 PM	6:00 PM
Mt. Pleasant (Rite Aid)	2:00 PM	6:30 PM
Summertown (Super Rama)	2:15 PM	6:45 PM
Ethridge (Amish Stop)	2:30 PM	7:00 PM
Lawrenceburg (Career Center)	2:45 PM	7:15 PM
Leoma/Loretto (Archive Building)	3:00 PM	7:30 PM

### Eligibility Evaluation

To the extent that vehicles do not deviate to pick up or drop off passengers, it is likely that the miles operated on this route largely qualify as feeder service. A direct connection is made at the Nashville Greyhound Bus Station at times that are within a few hours of multiple Greyhound bus departures on both the morning and afternoon SCATS runs.

It is unclear if miles operated on deviations to Spring Hill and Franklin qualify as feeder service. If deviation is done to pick up a passenger alighting at the Nashville Greyhound Bus Station, these miles may qualify as feeder service. However, deviations to drop off passengers at Spring Hill and Franklin may not qualify as feeder service.

### Service Alterations

No alterations to this service may be necessary for the bulk of miles operated to qualify as feeder service, given that service is provided to the Nashville Greyhound Bus Station. It is unlikely that the fact that some deviation requests may be non-feeder service disqualifies the vast bulk of fixed-route, feeder service-eligible mileage.

Fully converting this route to a fixed-route model with no deviations would more clearly align the entirety of this service with the FTA's definition of feeder service. Should SCTDD wish to maintain the deviated service provided to Spring Hill and Franklin, it may be necessary to utilize 5311 or 5311(f) funding depending on the purpose of the deviation, such as whether or not passengers being dropped off or picked up to continue on to Nashville.

## *Lawrence County SCATS – Murfreesboro Route*

### Service Description

This service includes one (1) trip in each direction on Wednesday between Leoma/Loretto and Murfreesboro. Intermediate stops include Lawrenceburg, Ethridge, Summertown, Mt. Pleasant, and Columbia. In Murfreesboro, this route operates out of the Greyhound bus stop. It is unclear to what extent vehicles will deviate to pick up or drop off passengers.

**Table 5-10** and **Table 5-11** below show the stops and departure times for outbound and inbound trips of the SCATS Nashville Route, respectively.

*Table 5-10: SCATS Murfreesboro Route Inbound Departure Times*

<b>SCATS Nashville Route Inbound Departure Times</b>	
<b>Stop Locations</b>	<b>Departure Time</b>
Leoma/Loretto (Archive Building)	6:30 AM
Lawrenceburg (Career Center)	6:45 AM
Ethridge (Amish Stop)	7:15 AM
Summertown (Super Rama)	7:30 AM
Mt. Pleasant (Rite Aid)	7:45 AM
Columbia (McDonald's Bear Creek)	8:00 AM

*Table 5-11: SCATS Murfreesboro Route Inbound Departure Times*

<b>SCATS Nashville Route Inbound Departure Times</b>	
<b>Stop Locations</b>	<b>Departure Time</b>
Murfreesboro/Greyhound	12:00 PM
Columbia (McDonald's Bear Creek)	1:30 PM
Mt. Pleasant (Rite Aid)	2:00 PM
Summertown (Super Rama)	2:15 PM
Ethridge (Amish Stop)	2:30 PM
Lawrenceburg (Career Center)	2:45 PM
Leoma/Loretto (Archive Building)	3:00 PM

### Eligibility Evaluation

To the extent that vehicles do not deviate to pick up or drop off passengers, it is likely that all miles operated on this route qualify as feeder service. A direct connection is made at the Murfreesboro Greyhound bus stop at times that are within a few hours of at least one Greyhound bus departure.

### Service Alterations

Given that this service is provided to the Murfreesboro Greyhound bus stop, no alterations to this service are likely necessary for the miles operated to qualify as feeder service.

### *Perry County SCATS*

### Service Description

This service includes two (2) trips in each direction, Monday through Friday, between Linden and Nashville. Intermediate stops include Hohenwald and Columbia. It is not immediately clear what the exact nature of this service is. Based on the schedule on SCTDD's website, significant time is built into the schedule to pick up passengers and

take them to medical appointments. While the same communities are served day-to-day, it is unclear if there are any fixed stop locations.

#### Eligibility Evaluation

It is unlikely that this service would qualify as feeder service. Based on the service schedule, the primary purpose of this service is for medical appointments, and it is unclear if trips are provided for other purposes. Additionally, while service is provided to Nashville, it is unclear if service would be provided, even upon request, to WeGo Central or the Nashville Greyhound Bus Station. If service is provided to the Nashville Greyhound Bus Station upon request, the miles operated for that trip may be feeder service-eligible, but not other trips.

#### Service Alterations

At a minimum, this service would need to be converted to a deviated fixed route to qualify as a feeder service, with one of the fixed stops being the Nashville Greyhound Bus Station at the time that allows reasonable transfers. Doing so would more clearly convey that intercity bus connections are a primary purpose of this route.

### *Lincoln County SCATS*

#### Service Description

This service includes three (3) fixed-route trips in each direction on Monday, Wednesday, and Friday, serving local shopping destinations and apartment buildings in Fayetteville.

#### Eligibility Evaluation

This service is general public transportation rather than feeder service. No connection is made with intercity bus services, as the entirety of this route is run in Fayetteville, where no intercity bus service is provided.

Even if an intercity bus stop was located in Fayetteville and this route served it, this route would still qualify as general public transportation as opposed to feeder service. The close proximity of stops to each other and the fact that only one rural community is served convey that the primary purpose of this service is local circulation rather than connecting to a greater network of intercity bus services.

#### Service Alterations

This service would need to be significantly restructured to qualify as feeder service, especially given that any intercity bus provider does not serve Fayetteville. In particular, connections would need to be made to intercity bus stops in Chattanooga, Manchester, Murfreesboro, or Nashville at appropriate times. Some of the local circulation in Fayetteville may be preservable from a regulatory standpoint. However, it would be difficult and expensive to maintain comparable frequencies within Fayetteville itself, given the distance to travel to intercity bus stops.

### **5.3. Local Public Transit Connections**

The following local public transit connections were identified through this assessment:

- In Cookeville, the Greyhound stop is co-located with UCHRA public transit services at is Putnam County office.
- In Memphis, Greyhound and MATA maintain a close partnership, with Greyhound collocated with MATA at MATA's Airways Transit Center.
- In Nashville, WeGo has multiple local bus routes near the Greyhound Bus Station.

Since 2021, Greyhound has discontinued its stop in Johnson City, which was previously located at the Johnson City Transit Center. This was not an impact from the pandemic, however, the closure was due to Greyhound eliminating staff levels at the transit center after Flix Bus purchased the company. Johnson City Transit discontinued the relationship due to safety concerns. The sale to Flix Bus also impacted stops in Bristol, Chattanooga, and will require a new location to be identified in Nashville.

### **5.4. Pandemic Impacts to Intercity Bus Service**

The COVID-19 pandemic continues to have wide-ranging impacts on a variety of systems in the United States, including the intercity bus system. A clear understanding of these ongoing impacts is critical to identifying ways to mitigate and overcome them.

COVID-19-related impacts on intercity bus providers and travel in Tennessee were evaluated through two (2) primary means: the provider and stakeholder surveys and meetings with providers and stakeholders. Each information-gathering process has a dedicated section below, in which the findings of each process related to COVID-19 impacts are discussed and summarized. Note that surveys, meetings, and other discussions held throughout this needs assessment were not exclusively concerned with the effects of COVID-19.

#### **5.4.1. Provider and Stakeholder Surveys**

Two (2) surveys were conducted to gather information on intercity bus needs through Tennessee, including information related to COVID-19 impacts on intercity bus service. The Provider Survey sought feedback from intercity bus providers (both current and future), rural transit providers, and urban transit providers. In contrast, the Stakeholder Survey sought feedback from organization stakeholders and the general public.

Both surveys were available between February 27, 2024, and April 30, 2024. The Provider Survey received twenty-one (21) responses, while the Stakeholder Survey received 328 responses.

More comprehensive summary information on the provider and stakeholder surveys is provided in the Task 4 Summary Report.

### 5.4.2. Provider Survey

On the Provider Survey, ICB providers were asked if they had reduced or eliminated service as a result of the COVID-19 pandemic and had not reinstated the same level of service as pre-pandemic. Greyhound was the only intercity bus provider that responded to the Provider Survey and answered this question, noting that they reduced frequencies in Tennessee due to the pandemic and have not yet attained the same level of service frequency.

In follow-up correspondence, Greyhound provided snapshots of pre- and post-pandemic schedules operating in Tennessee from 2019 to 2024, documenting the service frequency cuts referenced in their survey response. Based on Greyhound's schedules, service frequency reductions between 40 percent and 50 percent were typical, with multiple routes reduced to a single run per day.

Additionally, Greyhound provided aggregated ridership data showing passenger volumes broken down by whether passengers boarded or alighted in Tennessee, including if they both boarded and alighted in Tennessee. This data was provided for the months of January through September for the years 2019 through 2023. This data is summarized in **Table 5-12** below, where it is compared to 2019 levels:

*Table 5-12: Greyhound Passenger Volumes by January – September Period*

Boarding Location – Alighting Location	Passenger Volumes by January – September Period (% vs. 2019 Passenger Volumes)				
	2019	2020	2021	2022	2023
In Tennessee – In Tennessee	49,063 (100%)	25,703 (52%)	23,436 (48%)	28,843 (59%)	37,487 (76%)
In Tennessee – Outside Tennessee	117,781 (100%)	69,133 (59%)	70,777 (60%)	79,494 (67%)	91,637 (78%)
Outside Tennessee – In Tennessee	138,788 (100%)	74,629 (54%)	73,888 (53%)	81,809 (59%)	95,039 (68%)
<b>Total</b>	<b>305,632 (100%)</b>	<b>169,465 (55%)</b>	<b>168,101 (55%)</b>	<b>190,146 (62%)</b>	<b>224,163 (73%)</b>

Compared to 2019 passenger volumes, Greyhound's ridership has not recovered to pre-pandemic levels, with 2023 passenger volumes being 73 percent of 2019 passenger volumes for all boarding or alighting trips in Tennessee.

Napaway also provided ridership data for its service between Washington DC and Nashville, indicating they had run approximately 210 trips in both directions. However, they have since paused this service due to high operating costs.

The first section of this report provides a fuller accounting of historical changes in intercity bus service throughout Tennessee.

### 5.4.3. Stakeholder Survey

Respondents to the Stakeholder Survey were asked if intercity bus services used by their clients or by themselves have become unavailable since the COVID-19 pandemic, the results of which are summarized in **Figure 5-4**.

Few respondents reported that their intercity bus services have become unavailable since the COVID-19 pandemic. Among Stakeholder Survey respondents indicating “No” or “Unsure,” most indicated that they do not use intercity bus services. While not the majority, significant percentages of Stakeholder Survey respondents indicated that they use intercity bus service while being unsure of pandemic-related service reductions or not losing access to service they do use, possibly indicating that the effects of pandemic-related service reductions on individuals vary according to circumstance.

Few written responses explaining the effects of COVID-19-related service reductions on individuals themselves or respondents’ clients were provided. Greyhound and Megabus were the two providers mentioned in the provided responses.

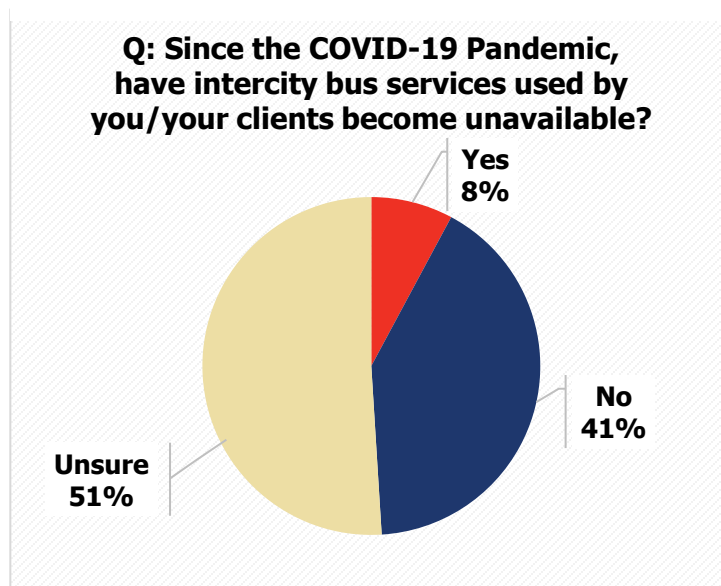
Megabus no longer operates any service in Tennessee, having consistently decreased its Tennessee services since at least 2018.<sup>7</sup> As a result, it is unclear to what extent the pandemic affected Megabus’s service offerings in Tennessee—news articles from as recent as November 2023 document the discontinuation of Megabus services.<sup>8</sup>

Written responses mentioning Greyhound reflect many of the service reductions documented by Greyhound itself, including discontinued service in Bristol, Johnson City, and Morristown, as well as service reductions through Nashville and Clarksville.

### 5.4.4. Provider and Stakeholder Meetings

A series of Provider and Stakeholder Meetings were held to gather information on a number of topics, including the ongoing impacts of the COVID-19 pandemic. Two (2) provider meetings were held, in which intercity bus providers and rural and urban transit agencies participated. One (1) stakeholder meeting was held, in which members of the

*Figure 5-4: Availability of ICB Services Now vs. Pre-Pandemic*



<sup>7</sup><https://www.knoxnews.com/story/money/business/2018/01/18/megabus-drops-knoxville-stops/1038218001/>

<sup>8</sup>[https://www.fox13memphis.com/news/megabus-no-longer-rolling-through-memphis-company-says/article\\_0eee9dde-833b-11ee-83b8-178425aa9c46.html](https://www.fox13memphis.com/news/megabus-no-longer-rolling-through-memphis-company-says/article_0eee9dde-833b-11ee-83b8-178425aa9c46.html)

general public and representatives from various organizational stakeholders participated. On an as needed basis, multiple one-on-one meetings were held with stakeholders and intercity bus and transit providers.

More comprehensive summary information of the provider and stakeholder meetings is provided in the Task 4 Summary Report.

#### **5.4.5. Provider Meetings**

Many of the same pandemic-related challenges were reported by both intercity bus providers and urban and rural transit agencies, including the following:

**Labor challenges:** Intercity bus providers and transit agencies reported ongoing challenges in hiring the staff required to operate their service, particularly drivers. Greyhound noted that their hiring rate currently exceeds their staff turnover rate, though they are still experiencing staff shortages. Likewise, transit agencies reported being consistently understaffed, resulting in ongoing challenges in meeting service demand. The primary contributor highlighted was meeting the expectations of candidates in terms of base pay and fringe benefits, as the cost of providing them has increased to a level that agencies struggle to provide.<sup>9</sup>

**Vehicle delivery time and vehicle cost increase:** The delivery times and cost of vehicles, both coach buses operated by intercity bus providers and vehicles used by transit agencies, have increased significantly, straining the ability of providers to maintain their fleets and meet the demand for their services. Intercity bus providers specifically noted that coach bus prices had increased 30 to 40 percent, while transit agencies noted nine (9) to twelve (12) vehicle delivery delays versus pre-pandemic delivery times. The experiences of Tennessee providers fit into a nationwide pattern of significant supply chain issues negatively affecting the transit industry.<sup>10</sup>

**Exhaustion of COVID-relief funding:** Both intercity bus providers and transit agencies have major concerns regarding funding levels and their ability to maintain operations after these sources are exhausted, which include CARES<sup>11</sup> and ARP funding<sup>12</sup>. Some providers noted that they have been judicious about not using COVID-relief funding to expand service due to the limited availability of CARES and ARP funding, but that there is a significant risk that the exhaustion of COVID-relief funding will lead to service cuts. As with other challenges, those faced by Tennessee providers are part of a nationwide trend in agencies facing significant deficits.<sup>13</sup>

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<sup>9</sup> <https://www.apta.com/research-technical-resources/research-reports/transit-workforce-shortage/>

<sup>10</sup> <https://www.masstransitmag.com/management/article/21289077/what-can-be-done-about-transits-supply-chain-challenges>

<sup>11</sup> Coronavirus Aid, Relief, and Economic Security (CARES) Act

<sup>12</sup> American Rescue Plan (ARP) Act of 2021

<sup>13</sup> <https://www.apta.com/wp-content/uploads/APTA-Survey-Brief-Fiscal-Cliff-June-2023.pdf>

#### **5.4.6. Stakeholder Meetings**

No specific discussion occurred during the Stakeholder Meeting, which compared pre-pandemic service levels to current service levels. However, meeting participants noted recent service reductions potentially exacerbated by the COVID-19 pandemic, including Megabus ceasing operations in Tennessee altogether and eliminating Greyhound service in Bristol.

#### **5.4.7. Summary of Pandemic Impacts**

Based on the information collected from intercity bus providers during the consultation process, critical obstacles exist to these services returning to pre-pandemic service levels. As outlined above, the number of intercity bus schedules operated in Tennessee has decreased significantly while the costs of operating a given level of service have increased considerably. Simultaneously, at least for Greyhound, intercity bus ridership has not recovered to pre-pandemic levels. COVID-relief programs such as CARES and ARP funding are nearing exhaustion, representing a significant revenue barrier to service expansion. Achieving pre-pandemic levels of services will likely require a mixture of new revenue sources for intercity bus providers, increased revenue from existing sources, and intentional policy actions by the State.

## **6. Identification of Unmet Need**

### **6.1. Demographic Indicators**

Intercity bus service in Tennessee primarily runs along major interstates and highways into major urban areas. Demographic groups considered in this analysis were those with a greater propensity and need to use ICB services, including individuals below the poverty line, populations with a disability, zero-vehicle households, college-aged populations, and the older adults populations. Understanding the demographic characteristics of those who receive and are without ICB service is critical to supporting future accessibility and mobility for underserved populations.

The communities surrounding the bus stops were identified using a 25-mile buffer from existing ICB provider stops, described as station catchment areas for this report. As defined by the Bureau of Transportation Statistics and the Office of the U.S. Secretary of Transportation, any person who lives within twenty-five (25) miles of an ICB stop is considered to have reasonable access to intercity buses and is within the service area.<sup>14</sup> The findings from the demographic existing conditions will help inform future decision-making, including service changes and financial allocations to providers.

**Table 6-1** displays the census tract data of the catchment areas as compared to the State of Tennessee. The percentage of population and households belonging to the demographic groups within the ICB catchment areas all track closely with the

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<sup>14</sup> <https://www.bts.gov/data-spotlight/85-rural-residents-have-reasonable-access-intercity-transportation-lack-reasonable>

corresponding percentages for Tennessee. Notably, the vast majority of each group is within twenty-five (25)miles of an active ICB stop. Individuals who possess one (1) or more of the characteristics of interest comprise over half of the catchment areas and state populations.

*Table 6-1: ICB Catchment Areas vs. Tennessee Demographic Characteristics*

Demographic	Catchment Areas		Tennessee	
	Total	Percent of Population / Households	Total	Percent of Population / Households
Individuals below the Poverty line	1,029,050	18.2%	1,285,645	18.6%
Individuals with a Disability	618,764	11.0%	823,898	11.9%
Households without Vehicles	118,286	5.3%	144,321	5.3%
College Population	526,354	9.3%	638,580	9.2%
Older Adults Population	912,428	16.2%	1,155,313	16.7%

Source: 2022 5-Year American Community Survey (ACS) Estimates

### 6.1.1. Total Population

**Figure 6-1** displays the population by census tract throughout Tennessee. The population within the census tract totals approximately 5,650,000 people, roughly 82 percent of the total population in the State of Tennessee. Within the catchment areas, the population is most concentrated at major urban centers such as Chattanooga, Knoxville, Memphis, and Nashville, as well as the nearby areas. Compared to the population decline from the previous year in major cities across Tennessee, from 2021-2022, these cities have shown significant growth except for Memphis, which continues to decline.<sup>15</sup>

While Memphis has consistently declined in population, western Tennessee is poised to experience significant demographic changes due to Blue Oval City, the planned Ford Motor Company assembly plant near Stanton. Five thousand eight hundred (5,800) jobs are estimated to be created at the assembly plant itself, with the potential for significant economic spillover effects throughout the region, such as the development of related industries and other employment opportunities to provide goods and services to new residents.<sup>16</sup> **Table 6-2** details the municipalities identified by ICB bus stops currently served by ICB services and their respective population, the cities and towns that are in the 25-mile catchment area, and the surrounding census tract population within 25 miles

<sup>15</sup> <https://tnsdc.utk.edu/2023/05/18/2022-population-estimates-show-big-cities-on-the-move-in-tennessee/>

<sup>16</sup> [https://www.fox13memphis.com/news/ford-to-invest-5-6-billion-in-memphis-area-megasite-to-build-electric-vehicles-and/article\\_b60a7d9e-3099-54de-a45e-d7696d4b7457.html](https://www.fox13memphis.com/news/ford-to-invest-5-6-billion-in-memphis-area-megasite-to-build-electric-vehicles-and/article_b60a7d9e-3099-54de-a45e-d7696d4b7457.html)

of the stop. Aligned with the assessment's intent, the population surrounding the station areas focuses on those in Tennessee.

*Figure 6-1: Total Population*

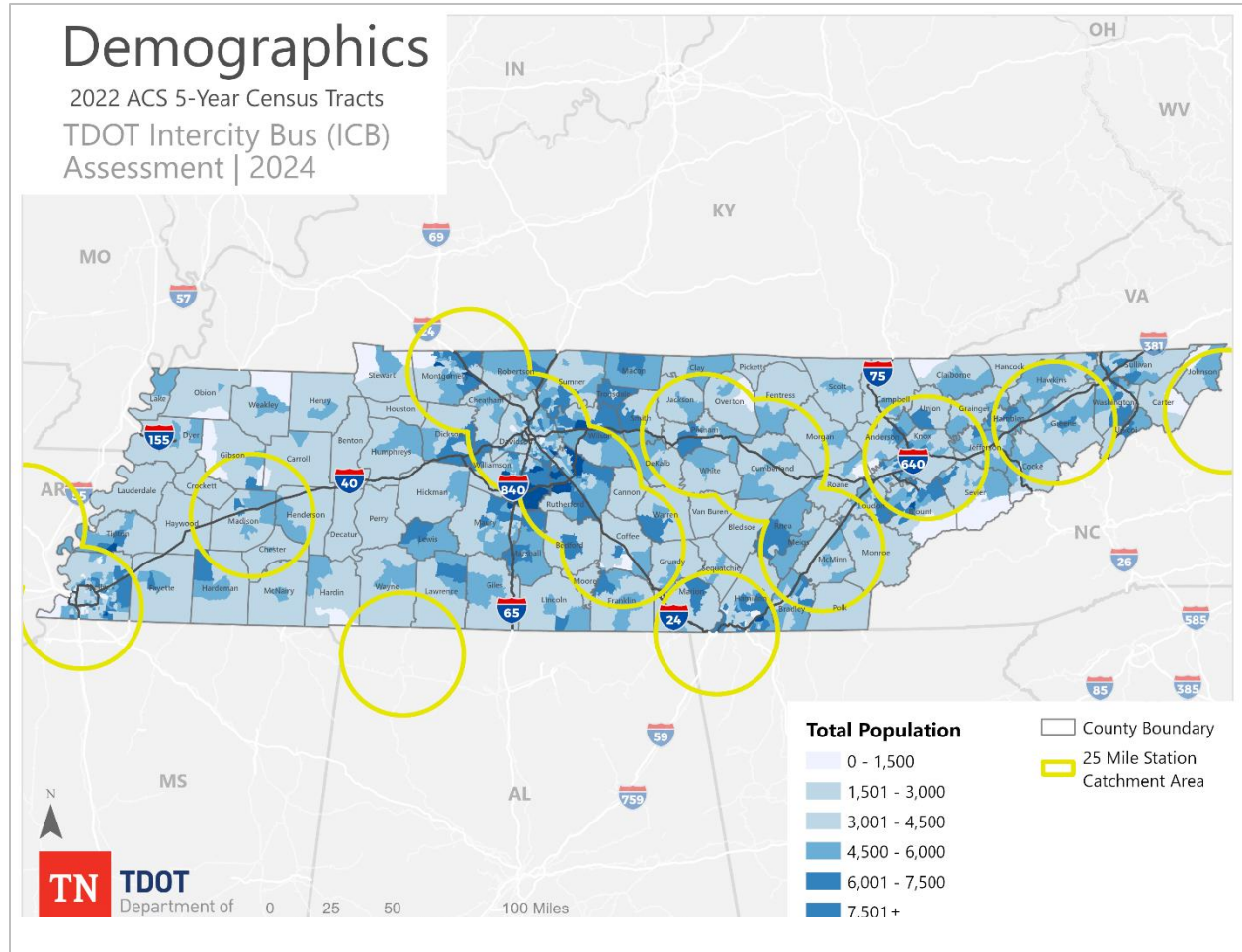


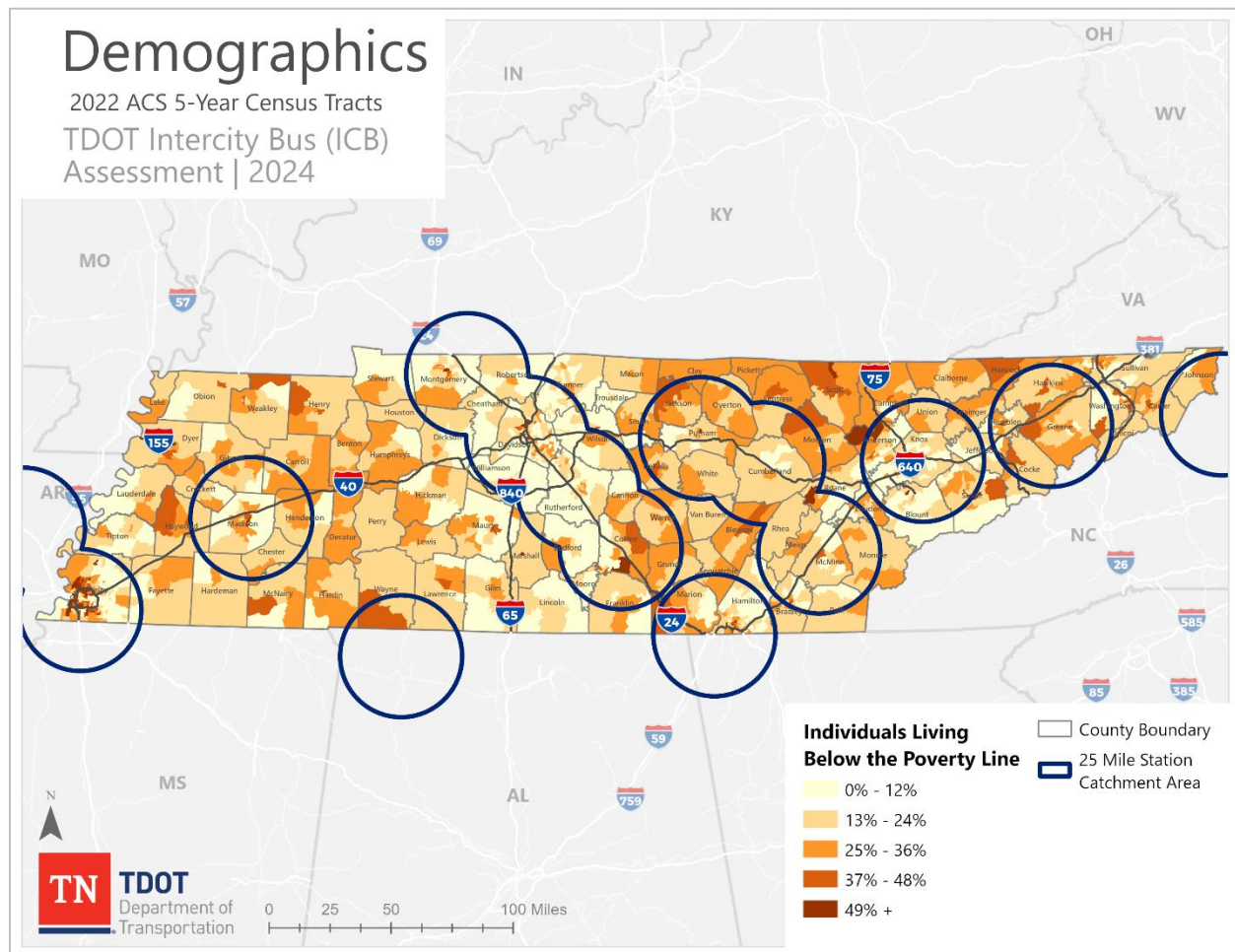
Table 6-2: Intercity Bus – Populations Served

Stop Location	Provider	Population (TN Only)	Other Cities and Towns Served	Tennessee Population within 25 Miles of Stop
Athens	Greyhound	14,091	Benton, Calhoun, Charleston, Cleveland, Dayton, Decatur, Englewood, Etowah, Graysville, Loudon, Madisonville, Niota, Philadelphia, Spring City, Sweetwater, Tellico Plains, Vonore	259,324
Boone (NC)	Greyhound	-	Mountain City	31,753
Clarksville	Greyhound	167,882	Adams, Ashland City, Cedar Hill, Charlotte, Clarksville, Coopertown, Cumberland City, Greenbrier, Nashville, Pleasant View, Ridgetop, Slayden, Springfield, Vanleer	247,574
Cookeville	Greyhound, PandaNY Bus	34,967	Algood, Baxter, Carthage, Doyle, Gainesboro, Gordonsville, Livingston, Monterey, Pleasant Hill, Smithville, South Carthage, Sparta	137,652
Crossville	Greyhound	12,099	Cookeville, Crab Orchard, Harriman, Monterey, Pleasant Hill, Rockwood, Sparta, Spring City, Sunbright	191,969
Florence (AL)	Greyhound	-	Collinwood, Loretto, St. Joseph	27,685
Jackson	Greyhound, Wanda Coach	67,993	Alamo, Atwood, Bells, Clarksburg, Enville, Finger, Gadsden, Gibson, Henderson, Humboldt, Lexington, Medina, Medon, Milan, Parker's Crossroads, Silerton, Three Way, Toone, Trenton	247,110
Knoxville	Greyhound, Miller/Hoosier Ride, PandaNY Bus, Wanda Coach	191,857	Alcoa, Blaine, Clinton, Dandridge, Farragut, Friendsville, Jefferson City, Lenoir City, Louisville, Luttrell, Maryville, Maynardville, New Market, Norris, Oak Ridge, Oliver Springs, Pigeon Forge, Plainview, Rockford, Rocky Top, Rutledge, Sevierville, Townsend	896,099
Manchester	Greyhound	12,325	Altamont, Beersheba, Bell Buckle, Centertown, Coalmont, Cowan, Decherd, Estill Springs, Gruetli-Laager, Lynchburg, McMinnville, Monteagle, Morrison, Murfreesboro, Normandy, Shelbyville, Tracy City, Tullahoma, Viola, Wartrace, Winchester, Woodbury	147,708
Marked Tree (AR)	Greyhound	-	(None)	8,664
Memphis	Delta, Greyhound, Jefferson Lines, Miller/Hoosier Ride, Vonlane, Wanda Coach	630,027	Arlington, Atoka, Bartlett, Collierville, Germantown, Lakeland, Millington, Munford, Oakland, Piperton, Rossville	953,781
Mosheim Town (Greenville)	Greyhound	2,492	Baileyton, Baneberry, Bean Station, Bulls Gap, Church Hill, Jonesborough, Morristown, Newport, Parrottsville, Rogersville, Surgoinsville, Tusculum, White Pine	304,447
Murfreesboro	Greyhound	153,487	Alexandria, Auburntown, Bell Buckle, Brentwood, Chapel Hill, Eagleville, Franklin, La Vergne, Lebanon, Mount Juliet, Nashville, Nolensville, Shelbyville, Smyrna, Thompson's Station, Wartrace, Watertown, Woodbury	293,301
Nashville	Greyhound, Miller/Hoosier Ride, PandaNY Bus, Tornado Bus, Vonlane, Wanda Coach	684,103	Ashland City, Belle Meade, Berry Hill, Brentwood, Coopertown, Fairview, Forest Hills, Franklin, Gallatin, Goodlettsville, Greenbrier, Hendersonville, Kingston Springs, La Vergne, Lebanon, Millersville, Mount Juliet, Murfreesboro, Nolensville, Oak Hill, Pegram, Pleasant View, Ridgetop, Smyrna, Springfield, Thompson's Station, White Bluff, White House	1,493,767
Wildwood (GA) (Chattanooga)	Greyhound	-	Chattanooga, Collegedale, Dunlap, East Ridge, Jasper, Kimball, Lakeside, Lookout Mountain, New Hope, Orme, Powells Crossroads, Red Bank, Ridgeside, Signal Mountain, Soddy-Daisy, South Pittsburg, Walden, Whitwell	408,092
<b>Total Population Served (Tennessee Only)</b>				<b>5,648,926</b>

### 6.1.2. Individuals Below the Poverty Line

The overall percentage of populations living below the poverty line within the catchment areas is 18.2 percent, which is slightly less than the Tennessee total (18.6 percent). The concentration of impoverished populations is disbursed throughout the State of Tennessee, with the greatest concentrations living in census tracts of urban areas and within the northeast region of the state northwest of I-640, as illustrated in **Figure 6-2**.

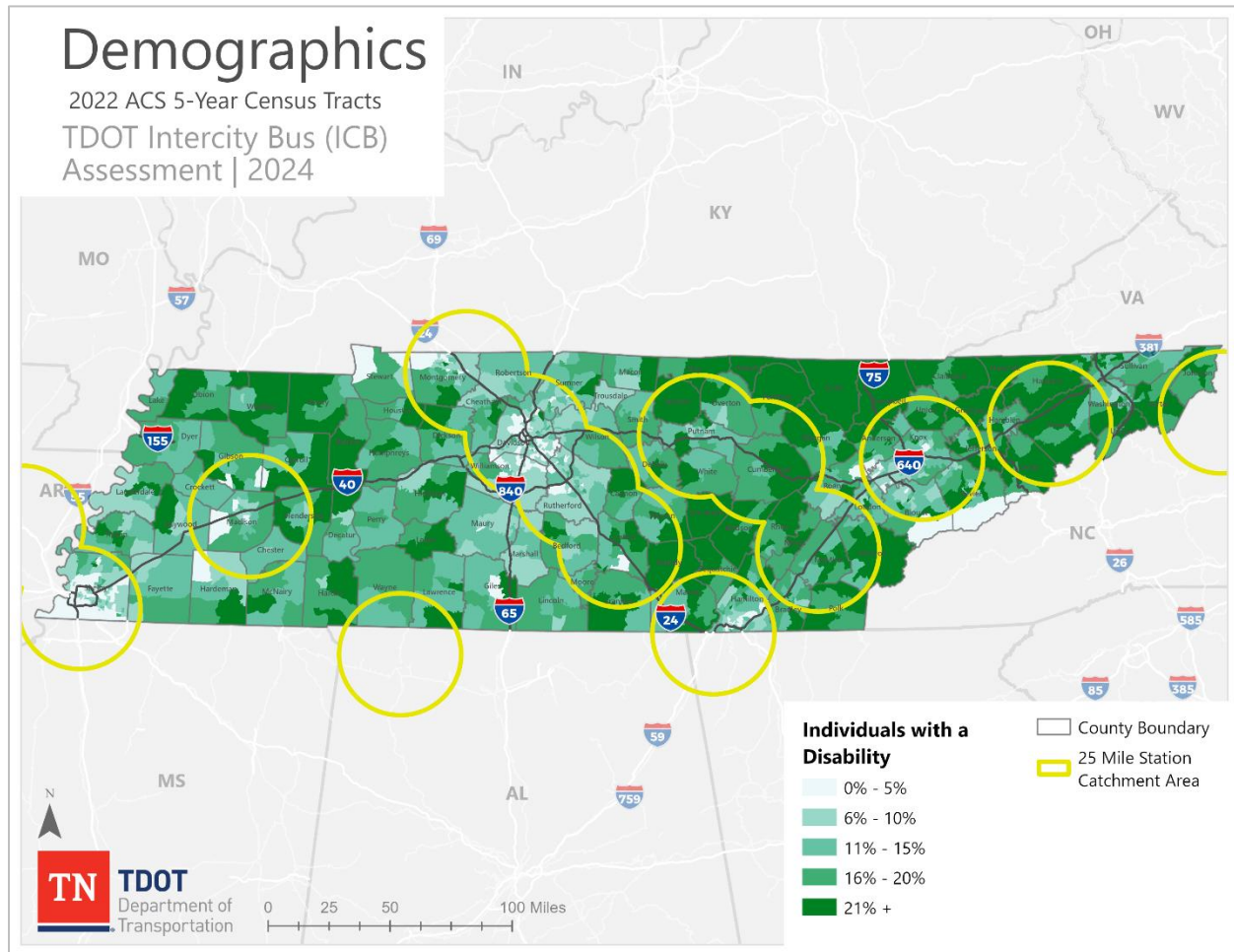
*Figure 6-2: Individuals Living Below the Poverty Line*



### 6.1.3. Individuals with a Disability

When compared to the average percentage of disabled populations within the State of Tennessee (11.9 percent), census tracts within the catchment area have a lower percentage of individuals with a disability (11 percent). As shown in **Figure 6-3**, the distribution of disabled populations is evenly dispersed across catchment areas and throughout the state. Findings show that there is significant aggregation within the northeast portion of the state, similar to individuals living below the poverty line.

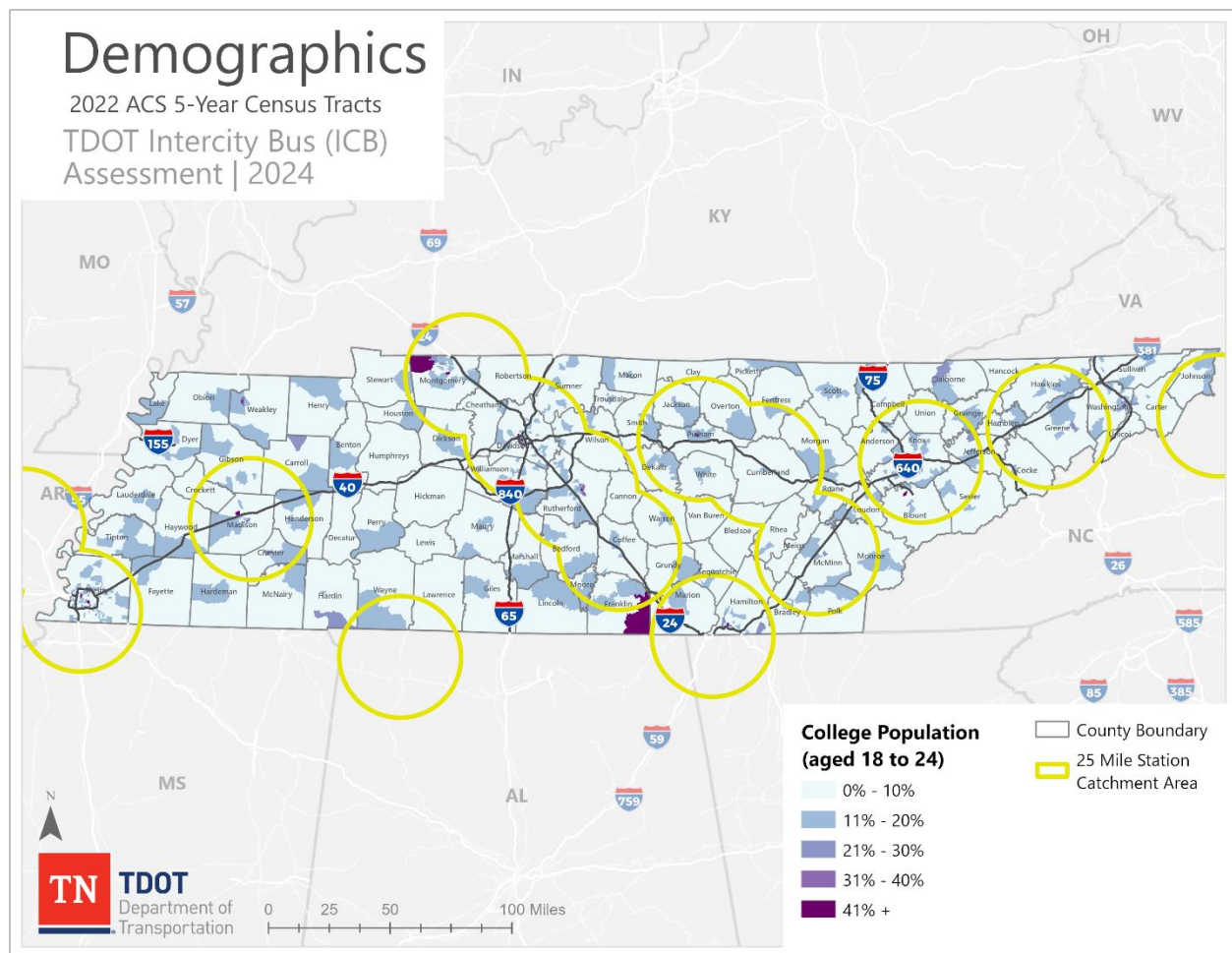
*Figure 6-3: Individuals with a Disability*



#### 6.1.4. College Population

This report defines the college population as a person 18 to 24 years of age. Within the catchment areas, the college population is 9.3 percent, which is nearly equal to that of Tennessee (9.2 percent). These populations are concentrated in urban centers and rural areas near major institutions of higher education, as shown in **Figure 6-4**.

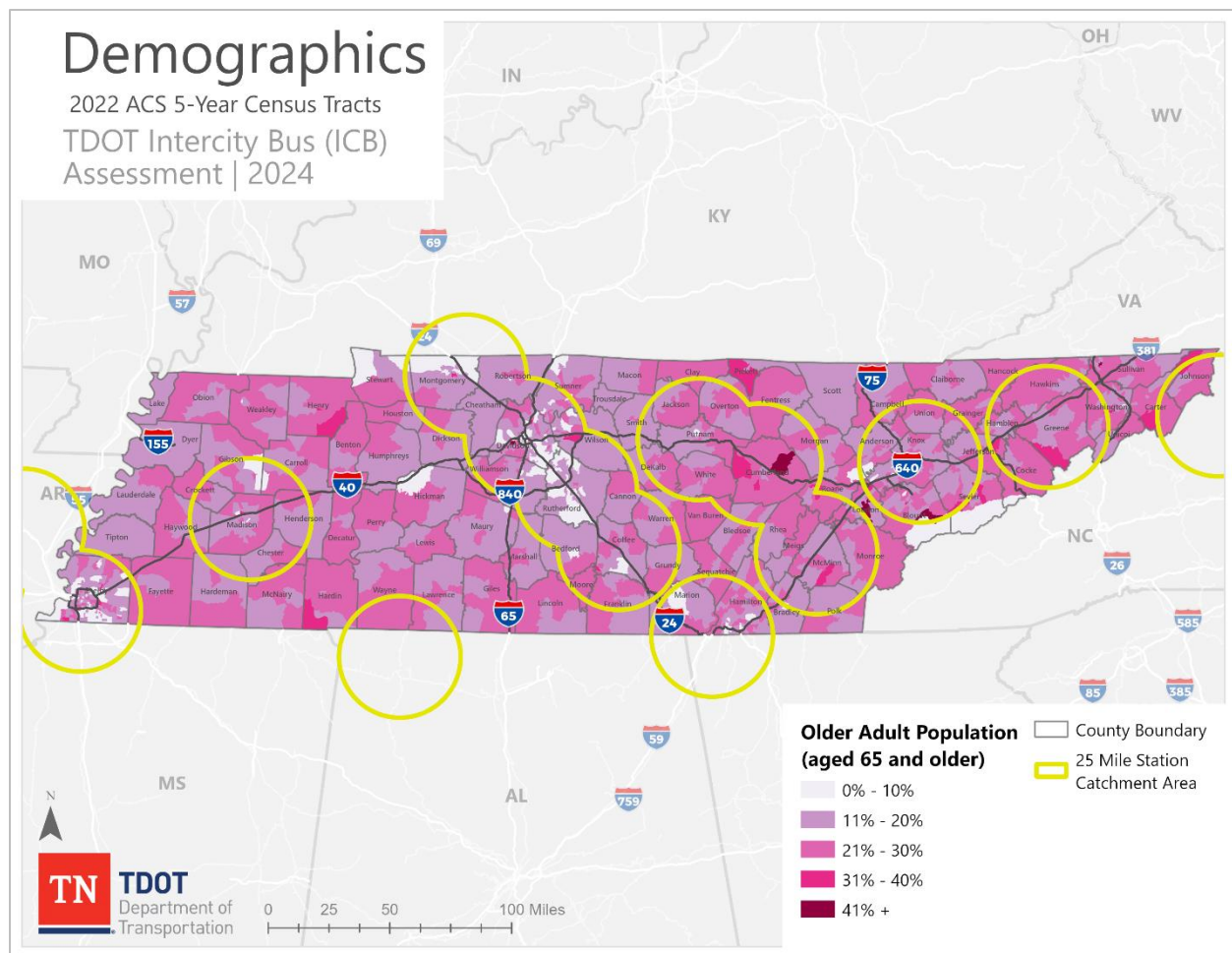
*Figure 6-4: College Population (Aged 18 to 24)*



### 6.1.5. Older Adults Population

This report defines older adults as anyone over the age of 65. Within Tennessee and the catchment areas, there is an even distribution of the concentration of older adults, as shown in **Figure 6-5**. The percentage of older adults within the station catchment areas is 16.2 percent as compared to 16.7 percent statewide.

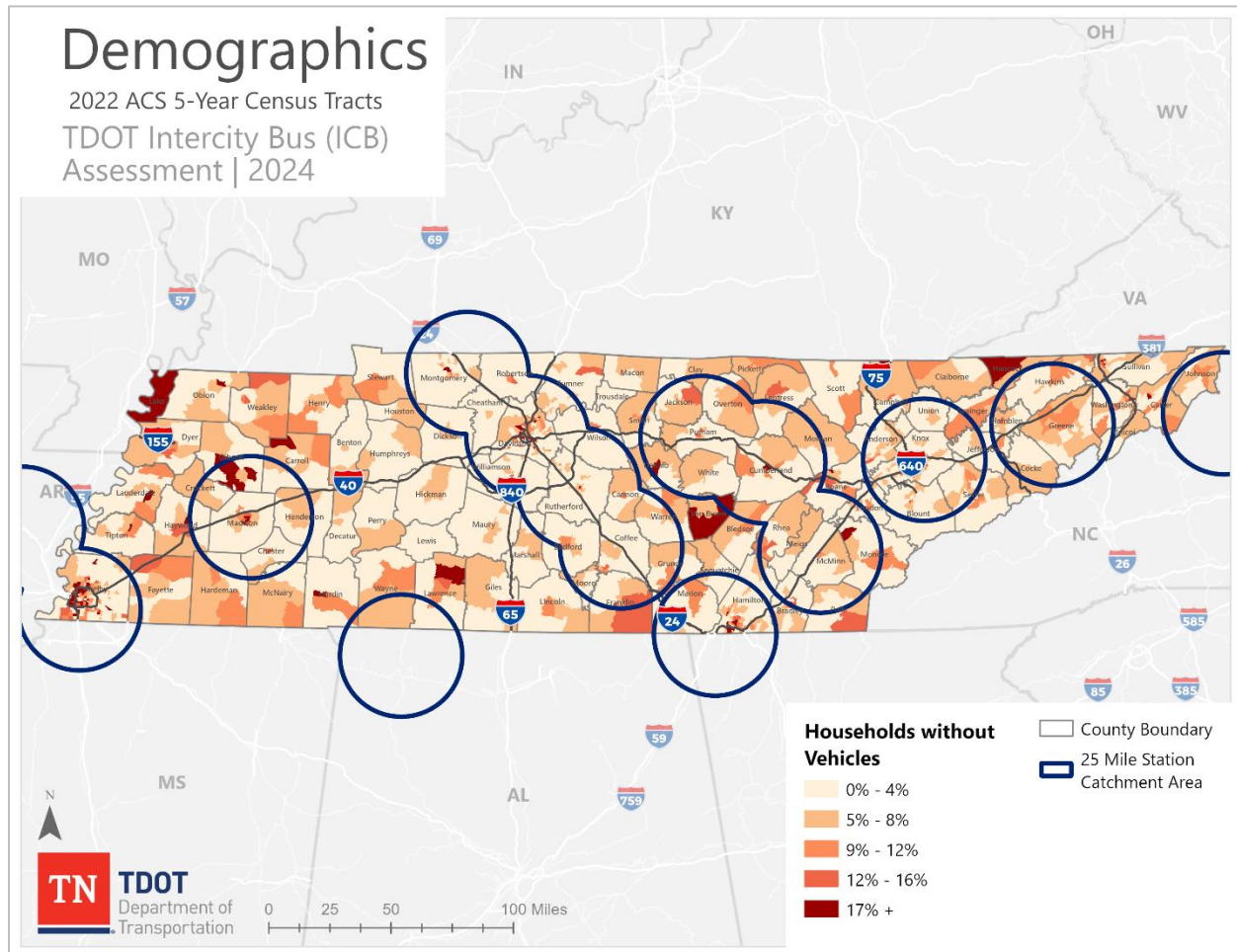
*Figure 6-5: Older Adults (Aged 65 and Older)*



### 6.1.6. Households without Vehicles

The average percentage of zero-vehicle households in the census tracts within the catchment areas is 5.3 percent, which is comparable to the state's (5.3 percent). Within the catchments, the greatest number of census tracts that have notable zero-vehicle households are those that capture major cities such as Nashville, Memphis, and Chattanooga. As shown in **Figure 6-6**, outside the catchment area, zero vehicle households are also present in rural communities.

*Figure 6-6: Households without Vehicles*



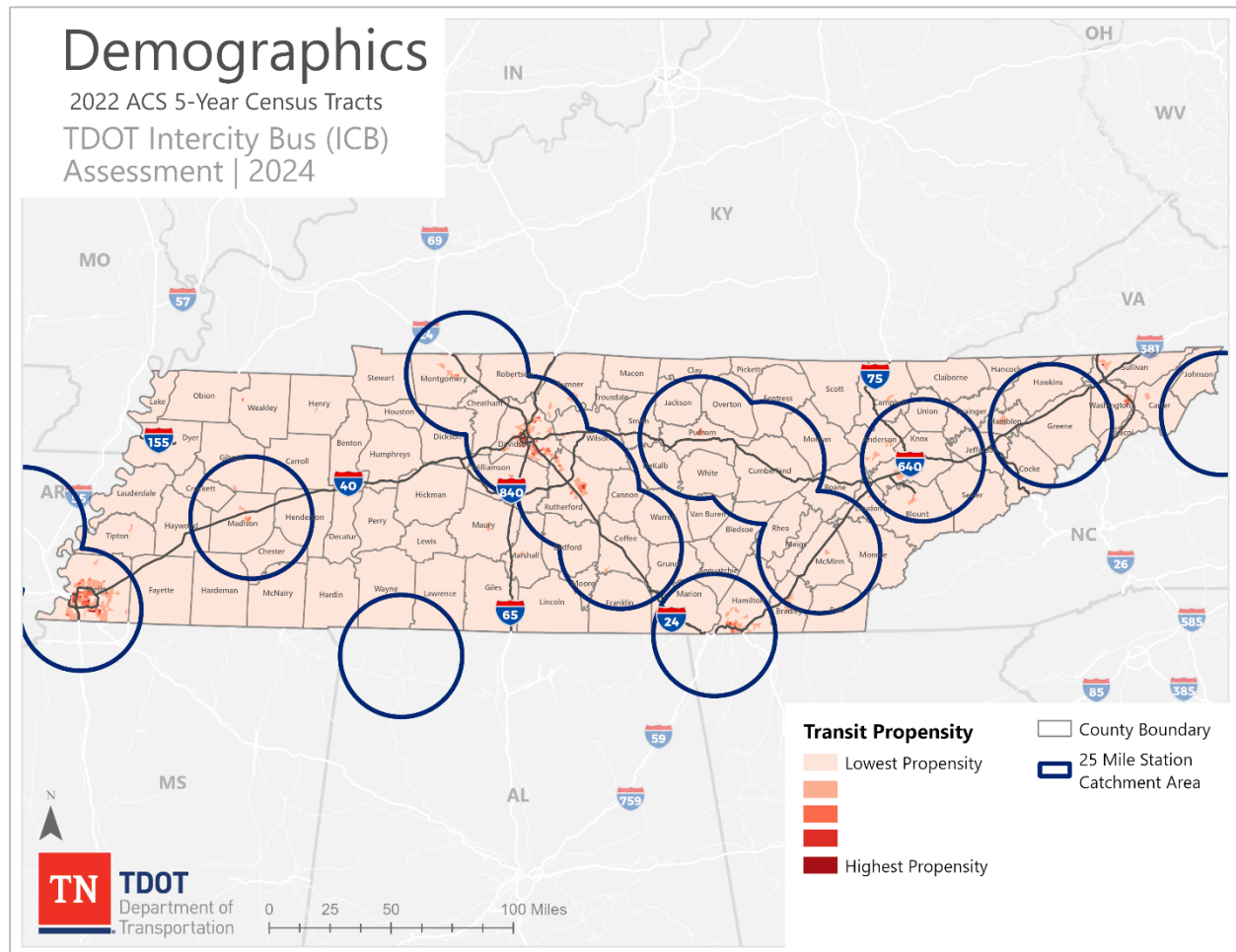
### 6.1.7. Transit Propensity

Transit propensity is used to provide a succinct analysis of the likelihood of residents in an area to utilize public transit. The transit propensity of a census tract shows the relative demand for transit in the area based on the demographic characteristics previously mentioned in the report. This report applies transit propensity to ICB services under the assumption that the various situations and economic conditions detailed above will result in populations using public transportation instead of alternative transportation such as car or air travel. For this analysis, transit propensity for all census tracts was calculated using the square mile population density based on the aggregate total of the demographic groups of interest.

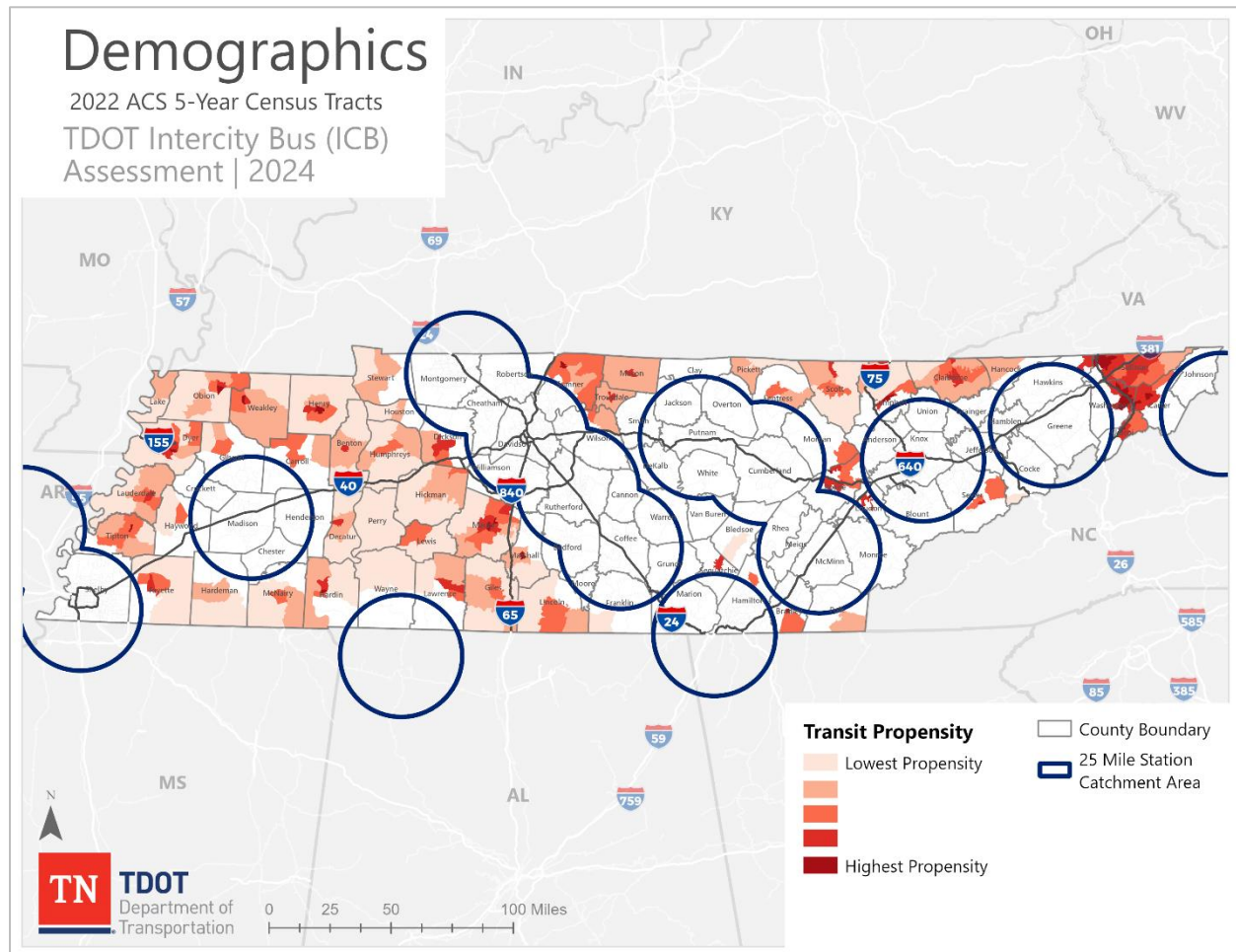
**Figure 6-7** shows that census tracts nearby and within major urban areas have the greatest transit propensity within the catchment areas and statewide. Urban areas surrounding Chattanooga, Knoxville, Nashville, and Memphis have the top 40 percent of transit-propensity census tracts. **Figure 6-8** illustrates the transit propensity of the remainder of the state after removing the populations in existing stop catchment areas. Gaps in service can be identified in census tracts throughout the state, but primarily in counties near catchment areas and specifically along the northeastern most portion of the state. However, it is critical to note that urban service providers do operate in this area.

When considering transit service in the area, understanding the potential for residents to use transit across the state is critical to establishing a system that provides efficient service for those who would benefit most. The results from the transit propensity analysis show that currently, there is adequate coverage of ICB service for the populations most likely to utilize ICB services. Future planning for ICB service should include recommendations that continue to enhance mobility for communities with high concentrations of transit riders.

*Figure 6-7: Transit Propensity*



*Figure 6-8: Transit Propensity with Catchment Area Exclusion*



## 6.2. Major Trip Generators

ICB services allow for increased access to key destinations that are most desired by the reviewed demographic groups of interest. These destinations include airports, medical facilities, military bases, colleges and universities, and correctional institutions. Additionally, ICB is often used for recreational travel for Tennessee residents as well as out-of-state tourists. Popular tourism-centered destinations such as national and state parks, stadiums and arenas, amusement parks, and convention centers are examples of other major trip generators for ICB service.

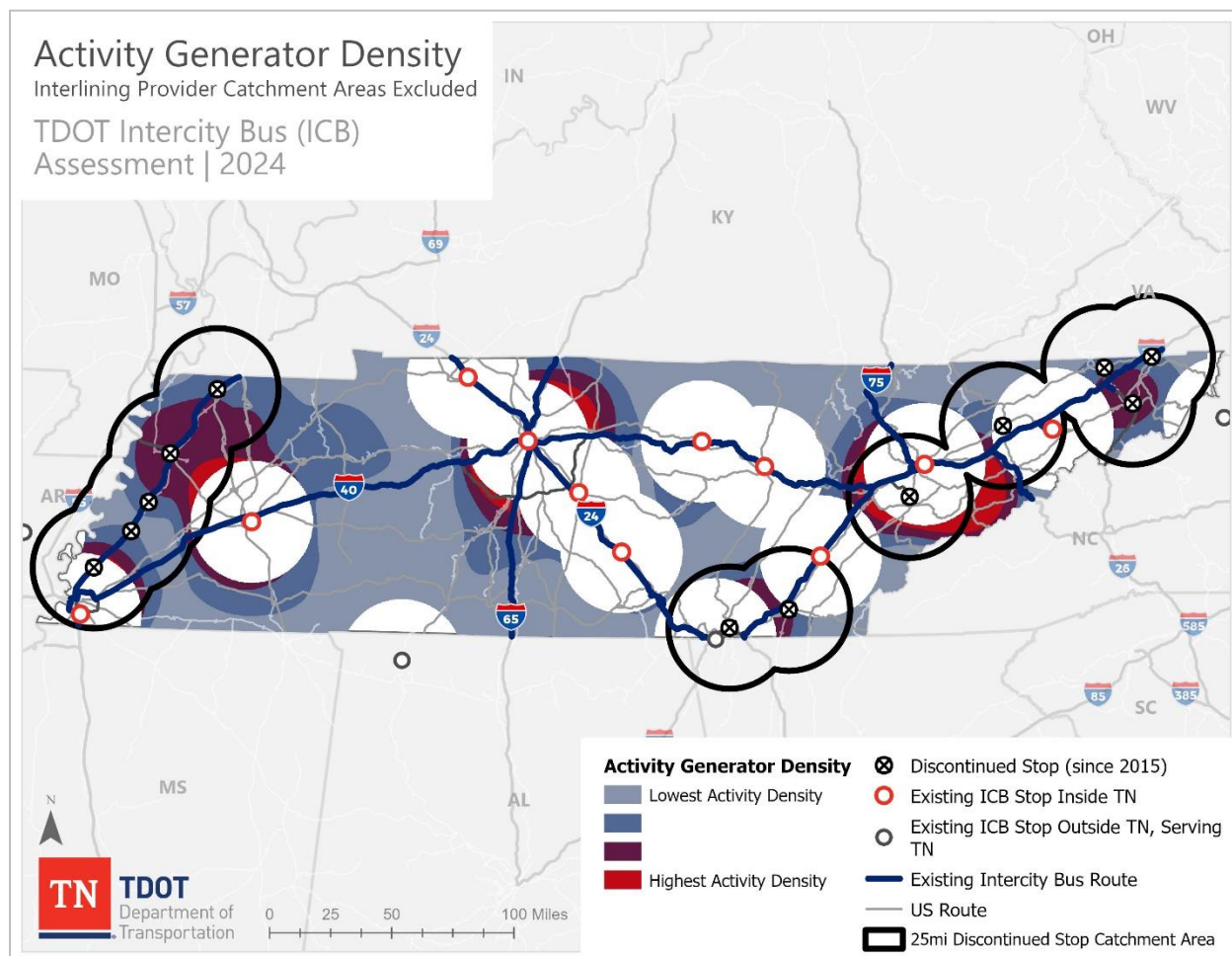
The popularity of travel trip generators as origins and destinations via ICB services varies depending on use and time of year. Colleges and universities typically generate the greatest demand for services during holidays, weekends, and the beginning and end of the school year and school breaks. Correctional institution trips usually occur on the weekends from visiting persons and throughout the year due to complimentary bus

tickets issued by the facility to previously incarcerated populations. Military families also generate trips throughout the year. The majority of these populations often do not have a personal vehicle and depend on ICB service to improve their mobility and provide access to these destinations.

**Figure 6-9** illustrates the dispersion of activity centers that generate ICB trips throughout Tennessee and their proximity to ICB bus stops. Portions of Tennessee within the catchment areas of existing stops have been excluded to focus specifically on unserved areas with significant concentrations of activity generators. The most significant concentration of activity centers is located in the areas surrounding major urban areas, those being Nashville, Memphis, Knoxville, Chattanooga, and Jackson. Findings also identify high-activity areas southeast of Knoxville near Gatlinburg and Pigeon Forge. Moderate activity centers are also located north of Memphis, along US-51, and in the Tri-Cities/Morristown area, along I-81.

ICB stops that have been discontinued since 2015 have resulted in service gaps within their previous 25-mile catchment area to key destinations throughout the state. Findings have identified these gaps primarily north of Memphis and east Tennessee towards the Tri-Cities/Morristown area.

*Figure 6-9: Activity Generator Density*



### 6.3. Provider and Stakeholder Engagement

The Tennessee Department of Transportation (TDOT) carried out an in-depth engagement process in alignment with Federal Transit Administration (FTA) requirements established in FTA Circular 9040.1G and with TDOT's goals for clearly establishing the level of intercity bus need in Tennessee with respect to rural transit needs. ICB providers, rural and urban transit providers, organizational stakeholders, and members of the general public were all included in this engagement process, which consisted of a series of focused group discussions, individual agency discussions, and online surveys.

The following sections summarize the primary findings of each engagement activity, organized by the group or type of agency engaged.

#### 6.3.1. Intercity Bus and Transit Provider Consultation Meetings

Engagement with ICB providers and other transit providers that provide service in the State of Tennessee included consultative meetings to garner an understanding of the

challenges and success of providing ICB service. Two (2) meetings were conducted: the first meeting was on April 3, 2024, followed by a second meeting on April 17, 2024, the latter of which focused on discussion highlights and key takeaways from a meeting prior with stakeholders and the general public.

### *Provider Consultation Meeting #1*

Twenty (20) providers attended the first meeting. Participants for both meetings represented private bus providers and rural public transit providers. The objective of the initial meeting was to discuss the purpose of the ICB assessment, existing bus stops, and services, as well as to present the interim results of the survey. Several key points emerged from the discussions. Firstly, TDOT expressed keen interest in enhancing accessibility to the state's transportation network, underscoring the need for improved communication among providers. Challenges in coordinating with municipalities and transit agencies to establish stops and connections were highlighted by participating ICB agencies. Charter bus agencies expressed their desire to become ICB providers and requested inclusion in the assessment, citing their interest in serving smaller communities and connecting with existing ICB providers.

Operational hurdles such as hiring challenges, inflated vehicle costs, and supply chain disruptions leading to delays in bus production and increased prices were also brought to light. Participants emphasized the importance of attracting youth to the industry as the current providers age out of the workforce and advocated for the construction of transfer stations for ICB. Additionally, there was a call to explore interstate connections and coordination with neighboring states, with TDOT encouraging the review of relevant reports for additional insights.

Discussions also revolved around potential new or expanded services along various corridors, contingent upon securing additional funding. These corridors included US-51 from Memphis north to Paducah and reinstating stops in the Tri-Cities and Morristown.

The impact of the COVID-19 pandemic was evident, with reduced trip frequencies, challenges in ramping up services post-pandemic, and persistent labor issues. Suggestions were made for government-led educational initiatives to raise awareness about ICB services among the public. Throughout the meeting, there was a consensus on the necessity for local government and public transit provider support of ICB services. Memphis was highlighted as a success story in addressing stop/station challenges and supporting ICB services.

Greyhound raised facilities access in Nashville as a particular concern due to the national importance of Nashville as a transfer location. The lease on their current bus station expires in October 2024 and is not expected to be renewed, raising serious concerns about the future of transfers in Nashville.

### *Provider Consultation Meeting #2*

The second meeting engaged fourteen (14) providers. The primary objective of the meeting was to provide updates on the ongoing 2024 ICB assessment and to emphasize participation in completing and distributing the stakeholder survey and engaging in the assessment. Feedback to guide the direction of the forthcoming report was also solicited.

Several pertinent issues were addressed during the discussions. Greyhound, a major ICB provider, shared insights into their operational strategies, including the use of onboard surveys and website data to gauge demand and travel patterns. It was noted that although Greyhound continues to serve large markets post-pandemic, frequencies have been reduced, and smaller markets have experienced significant ridership declines. Specific challenges were highlighted, such as Greyhound's struggle to secure a regular stop location in Knoxville due to zoning constraints and cost-related issues with the local transit center.

Concerns were raised by rural transit providers about the inadequacy of current funding levels to sustain pre-pandemic service, with particular concerns about maintaining service levels once COVID relief funds are depleted. Rural transit agencies also cited frequent trip denials as evidence of service provision impacted by a lack of funding. Participants offered constructive suggestions for TDOT's support of ICB providers, including fostering closer collaboration with funded entities, facilitating funding and coordination discussions with Metropolitan Planning Organizations (MPOs) and local governments, and drawing inspiration from successful state programs like those in North Carolina, Texas, Virginia, Washington, and Florida. The establishment of a regular forum for discussing ICB issues and for ICB providers and transit providers to coordinate was highlighted.

#### **6.3.2. Rural Transit Provider Consultation Meeting**

On May 2, 2024, TDOT organized a meeting to discuss the needs of rural transit providers. FTA Circular 9040.1G states, "...the assessment of ICB needs may be made relative to other rural needs in the state." This meeting was designed as an opportunity to gather information from rural transit providers on their current needs, challenges, and impacts of funding availability in relation to the ICB program. Many of the state's eleven (11) rural transit agencies attended the meeting, with five (5) agencies providing comments. A summary of the discussions is outlined below.

The Upper Cumberland Human Resource Agency (UCHRA) is grappling with multiple challenges that are impacting its transportation services. The agency is concerned about the poor service reliability of Greyhound, which has resulted in customers being stranded, and they are facing significant funding issues that hinder operations. Despite returning to pre-pandemic service levels, UCHRA struggles with low starting pay of \$13 per hour, which is insufficient to attract and retain drivers. Additionally, the agency finds acquiring large cutaways harder than raised-roof vans, complicating vehicle availability. Local funding challenges make it difficult to fully utilize their 5311 funds, and TNCARE trips

have been reduced by two-thirds since 2010 due to competition from private carriers such as MEDIC. Reducing the agency's 5311 funding would further reduce service and exacerbate wage competitiveness issues.

Similar problems are seen across other agencies in Tennessee:

- East Tennessee Human Resources Agency (ETHRA) has lost ICB service from Morristown to Knoxville and finds its starting salary of \$15 per hour too low, though it is now offering full benefits to attract drivers.
- The Northwest Human Resource Agency (NWHRA) is losing drivers to competitors paying \$20 per hour while it can only offer \$14.05 per hour, and it faces ongoing vehicle acquisition challenges.
- Mid-Cumberland Human Resource Agency (MCHRA) acknowledges that its current driver pay of \$14.05 per hour is inadequate and needs to increase to \$17 per hour.
- Delta Human Resource Agency also struggles with low driver pay at \$14 per hour, difficulties recruiting new drivers and acquiring vehicles, and has not returned to pre-pandemic service levels.

Providers were prompted on what they believe the possible impacts of TDOT reserving the 15 percent 5311(f) set aside for ICB operations would be on their service<sup>17</sup>. Universally, rural providers stated that this would significantly hinder their ability to maintain current service levels or reinstate pre-pandemic service levels.

Overall, these agencies are experiencing a combination of low wages, insufficient funding, vehicle acquisition difficulties, and competition from private carriers, all of which threaten their ability to maintain and expand transportation services.

### **6.3.3. Individual Transit Provider Consultation Meetings**

Feeder service is a form of ICB service, as outlined in FTA Circular 9040.1G<sup>18</sup>, with the purpose of providing connections between small transit operations and ICB carriers via rural areas. Similar to ICB service itself, feeder service must make meaningful connections to other ICB services, i.e., within a very close distance and within a short period of time. Feeder service may be fixed-route or demand-response, and it may be provided by transit agencies or contracted for by the state. Vehicles must have the ability to handle passenger luggage.

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<sup>17</sup> TDOT typically seeks the Governor's certification that intercity bus needs are being adequately met relative to rural transit needs, thus TDOT reserving the 15% set aside for 5311(f) operations would effectively cut Federal funding for rural transit by 15%.

<sup>18</sup> FTA Circular 9040.1G,  
[https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA\\_Circular\\_9040\\_1Gwith\\_index\\_-\\_Final\\_Revised\\_-\\_vm\\_10-15-14%281%29.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Circular_9040_1Gwith_index_-_Final_Revised_-_vm_10-15-14%281%29.pdf)

Feeder service can play a critical role in maintaining the health of the overall ICB network by providing shorter ICB trips and by directly connecting passengers to the more extensive ICB network that transcends state lines.

To evaluate potential feeder services in Tennessee, rural transit agencies were asked to indicate if they provide service that might qualify as feeder service in the Stakeholder Survey. Individual meetings with rural transit agencies were held to gather more information if the agency indicated they might be currently providing feeder services. Information collected from rural transit agencies is summarized below, which was used to evaluate the eligibility of these services for ICB funding and any alterations to the service that would need to be made to make the service eligible.

### *Upper Cumberland Human Resources Agency (UCHRA)*

UCHRA's McMinnville to Nashville service includes two (2) trips in both directions for a total of four (4) trips, Monday through Friday, serving Centertown (Warren County), Woodbury (Cannon County), Kitrell (Rutherford County), Murfreesboro (Rutherford County), and Nashville International Airport as intermediate stops. In McMinnville, the service operates out of the UCHRA Warren County office<sup>19</sup>, while in Nashville, it serves the downtown WeGo Central Station. However, the service does not have a dedicated bay to pick up or unload passengers.

The UCHRA Murfreesboro/VA Express service includes two (2) trips per day in both directions for a total of four (4) trips, Monday through Friday. In McMinnville, the service operates out of the UCHRA Warren County office, while in Murfreesboro, it serves the Alvin C. York VA Medical Center, with an intermediate stop at the UCHRA Cannon County office.

The UCHRA Cookeville to Nashville service includes three (3) trips in both directions for a total of six (6) trips each weekday, serving Silver Point (Putnam County), Carthage (Smith County), Lebanon (Wilson County), and the Nashville International Airport as intermediate stops. In Cookeville, the service operates out of the Cookeville Transit Hub/Greyhound Station; in Nashville, it serves the Nashville Greyhound Bus Station, the WeGo Central Station, and the Nashville International Airport. The UCHRA Cookeville Transit Hub is the transfer point for all UCHRA passengers utilizing the service.

The UCHRA Crossville to Knoxville service includes one (1) trip in each direction on Mondays, Wednesdays, and Fridays, serving no fixed, intermediate stops, though passengers can request drop-off along the route. In Crossville, the service operates out of the UCHRA Cumberland County office<sup>20</sup>, while in Knoxville, it serves the Knoxville Airport (McGhee Tyson Airport).

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<sup>19</sup> 201 Locust St. #16, McMinnville, TN 37110

<sup>20</sup> 1720 West Ave, Crossville, TN 38555

The UCHRA Lafayette to Nashville service includes one (1) trip in each direction on Monday through Friday, serving Gallatin as an intermediate stop. In Lafayette (Macon County), it operates out of the UCHRA Macon County office<sup>21</sup> while in Nashville it serves the downtown WeGo Central Station, the Greyhound Bus Terminal, and the Nashville International Airport.

Upon request, UCHRA drivers will take passengers to nearby street corners or businesses that are near their final destination, although drop-off at private residences is generally disallowed.

#### *South Central Tennessee Development District (SCTDD)*

The SCTDD Lawrence County to Nashville service includes two (2) trips in each direction, Monday through Friday, between Leoma/Loretto and Nashville. Intermediate stops include Lawrenceburg, Ethridge, Summertown, Mt. Pleasant, Columbia, and Spring Hill or Franklin (upon request on inbound trips). In Nashville, this route operates out of the Greyhound Bus Station. Aside from service to Spring Hill and Franklin, it is unclear to what extent vehicles will deviate to pick up or drop off passengers.

The SCTDD Lawrence County to Murfreesboro service includes one (1) trip in each direction on Wednesday between Leoma/Loretto and Murfreesboro. Intermediate stops include Lawrenceburg, Ethridge, Summertown, Mt. Pleasant, and Columbia. In Murfreesboro, this route operates out of the Greyhound bus stop. There is an unset variation to what extent vehicles will deviate to pick up or drop off passengers.

The SCTDD Perry County service includes two (2) trips in each direction, Monday through Friday, between Linden and Nashville. Intermediate stops include Hohenwald and Columbia. It is not immediately clear what the exact nature of this service is. Based on the SCTDD website schedule, significant time is built into the schedule to pick up passengers and take them to medical appointments. While the same communities are served day-to-day, it is unclear if there are any fixed stop locations.

#### **6.3.4. Stakeholder Meeting**

On April 11, 2024, the Tennessee Department of Transportation (TDOT) organized a meeting involving a diverse group of stakeholders and members of the general public. The meeting engaged thirty-four (34) stakeholders. The central aim of this meeting was to delve into the ongoing revision of the 2024 ICB Assessment conducted by TDOT and to gather valuable insights and feedback from ICB users, local governments, human service agencies, and other stakeholders regarding their experiences with ICB transportation.

Public agencies raised concerns regarding the necessity for improved coordination with ICB providers to ensure seamless connectivity to key destinations. Attendees also

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<sup>21</sup> 607 TN-52 Bypass, Lafayette, TN 37083

highlighted the utility of strategies employed by other agencies, such as the statewide transportation model utilized by the Virginia Department of Rail and Public Transportation (DRPT), in effectively gauging travel demands. Additionally, there was expressed interest in establishing crucial connections between Anderson County (Clinton/Oak Ridge) and the transit station in Knoxville. Some stakeholders mentioned addressing concerns about Greyhound's compliance with ADA needs and ensuring dependable transportation options for elderly and disabled residents.

The meeting also shed light on challenges related to differentiating between local and ICB services, as well as service limitations due to labor shortages faced by agencies due to the pandemic. An agency noted they are approximately thirteen (13) to fifteen (15) drivers short. Furthermore, stakeholders advocated for expanding services to various locations, including Rutherford County and Clinton/Oak Ridge, in response to constituent demands for more options and additional bus providers. It is important to note that the type of service requested during the meeting was more aligned with rural public transportation than ICB service. Transit riders' persistent requests for increased access to key destinations, such as medical appointments in Knoxville and regular service from Fayette County, were also underscored.

### 6.3.5. Provider Survey

An online survey of ICB providers and rural and urban transit providers was conducted to gather information on ICB needs throughout Tennessee. Available via Microsoft Forms, this survey was available between February 27, 2024, and April 30, 2024, and received twenty-one (21) responses, which included three (3) charter bus providers who do not currently provide ICB service in Tennessee. **Table 6-3** lists the providers who responded to the provider survey by type. Note: some agencies provided multiple responses.

*Table 6-3: Provider Survey Respondents by Agency Type*

Provider	Provider Type	Provider	Provider Type
Coach USA	ICB	Murfreesboro Transit	Urban Transit
Delta Human Resource Agency	Rural Transit	Napaway Coach	ICB
First Class Charter LLC	Charter Bus	Northwest Tennessee Human Resource Agency	Rural Transit
FTHRA	Rural Transit	On Your Mark Transportation LLC	Charter Bus
Greyhound Lines, Inc.	ICB	SETHRA	Rural Transit
Jefferson Lines	ICB	Southeastern Stages, Inc	ICB
Memphis Area Transit Authority	Urban Transit	Southwest HRA	Rural Transit
Memphis Area Transit Authority	Urban Transit	Todlow Coach, LLC	Charter Bus

Mid-Cumberland Human Resource Agency	Rural Transit	Upper Cumberland Human Resource Agency	Rural Transit
Mid-Cumberland Human Resource Agency	Rural Transit	Vonlane	ICB
Miller Transportation	ICB		

The following seven ICB providers responded, with those currently providing service in Tennessee in bold:

- Coach USA
- **Greyhound Lines, Inc.**<sup>22</sup>
- **Jefferson Lines**<sup>23</sup>
- Miller Transportation
- **Napaway Coach**
- Southeastern Stages, Inc.
- **Vonlane**

All questions were written responses, allowing providers to provide significant detail in their answers if desired. Specific questions varied according to the type of provider, with the following subjects being addressed throughout all surveys:

- Current status of interagency coordination
- New or planned ICB stops and routes
- New or planned frequency increases
- Effects of COVID-19 on ICB services
- Current services that may qualify as feeder service

The following section describes the primary findings of the provider survey, with each provider type discussed in separate sections.

### *Intercity Bus Providers*

#### *Customer Feedback Regarding Being Unable to Complete Trips*

According to ICB providers, the primary customer feedback they have received on the reason for being unable to complete trips was focused on a lack of service altogether. Providers noted requests for service in Nashville, Knoxville, and Chattanooga. While service is already provided to these cities by Greyhound, providers reporting receiving this feedback were smaller, boutique providers such as Napaway and Vonlane. Lack of frequency was also a secondary concern reported by customers to ICB providers, including to cities that currently have service.

<sup>22</sup> Greyhound operates routes connecting most major cities in Tennessee.

<sup>23</sup> Jefferson Lines currently operates out of Memphis only.

### Coordination with Transit Providers

Greyhound and Jefferson Lines are the only ICB providers that reported they were coordinating with public transit agencies in Tennessee, while smaller ICB providers universally reported that they do not coordinate, nor did they express any interest in coordinating with public transit providers.

Jefferson Lines currently only operates out of Memphis, specifically out of the Memphis Area Transit Authority's (MATA) Airways Transit Center and has expressed interest in continuing to coordinate with transit agencies as they expand service in Tennessee.

Aside from coordination with MATA, Greyhound operates out of the UCHRA Cookeville office. Greyhound indicated that facility access for passengers and drivers of their service is a primary concern for them in the future. A lack of facility access has led to both the closure of stops (e.g., Johnson City) as well as the relocation of stops to less convenient locations (e.g., the Chattanooga stop being relocated to Wildwood, GA and the Knoxville Greyhound stop being relocated outside of downtown Knoxville).

Greyhound also reports that the lease on their Nashville Greyhound station expires in October 2025 and is not expected to be renewed. Greyhound is currently discussing facility access with WeGo at the planned Antioch Transit Center..

### New Stops, Routes, or Frequency Increases Planned

Multiple smaller providers expressed a desire to expand service offerings in Tennessee, including adding routes to Memphis, Nashville, Chattanooga, and Knoxville, connecting to Atlanta, GA, and Columbia, SC.

Greyhound is interested in reinstating stops that were recently discontinued for a variety of reasons. Bristol, Johnson City, Kingsport, and Morristown were discontinued due to facility access issues. Union City, Dyersburg, Covington, and Millington were discontinued due to limited ridership and the need to provide faster connections between Memphis and St. Louis. Greyhound currently operates a service that runs through these communities along US-51 but does not stop at them. Finally, Greyhound expressed an interest in serving Etheridge, Humboldt, Milan, and Cleveland but noted that these stops are prohibitively far from the main highway where routes operate.

### At-Risk Stops or Routes

Two smaller providers noted that they have either put services on hold or may reduce service levels due to high operating costs versus passenger volumes. Napaway has suspended their Nashville to Washington D.C. service due to high operating costs, while Vonlane stated they may need to cut service to Memphis and Atlanta from Nashville.

Greyhound indicated they are not anticipating service reduction on any Tennessee routes due to low ridership but that facility access continues to be a challenge in the following locations:

- Greyhound recently relocated its Chattanooga stop to a service station in Wildwood, GA, an outlying area with little sidewalk connectivity or transit access.
- As noted before, Greyhound's lease on their Nashville bus station is ending in October 2025, and they are currently working to identify a suitable replacement.
- Greyhound has attempted to co-locate with Knoxville Area Transit at their transit center but has been unsuccessful.

### Additional Comments

Greyhound emphasized that Nashville is the second largest transfer location in their network and that Memphis has taken on new importance in facilitating transfers due to facility access challenges in Little Rock, AR.

### *Rural Transit Providers*

#### Coordination with Transit Providers

Most rural transit providers who responded to the provider survey regarding coordination with ICB providers responded "N/A" or that they did not currently coordinate with them. Some rural transit providers may not coordinate with ICB providers because there are no ICB stops in their service area.

Among those rural providers that coordinate with ICB providers, two (2) noted that they either currently or previously provided fixed-route services they believe qualify as feeder services (FTHRA and UCHRA). FTHRA continues to provide demand-response service to ICB stops that are within the agency service area. UCHRA mentioned five (5) potential feeder service routes, including one (1) operating between Cookeville and Nashville and one (1) operating between McMinnville and Murfreesboro.

Mid-Cumberland Human Resources Agency (MCHRA) also noted that they provide demand-response trips to the Clarksville and Nashville Greyhound stops.

#### Intercity Bus Service

No rural transit providers mentioned providing ICB service, although some providers highlighted the need for ICB in their region. Gallatin and Lebanon were noted as potentially benefitting from an ICB stop, while Tipton, Lauderdale, and Fayette counties were highlighted as possible opportunities for ICB service in light of development likely to occur as part of Blue Oval City outside of Memphis.

#### Feeder Service

Providers who indicated they provide feeder service primarily mentioned that they provide demand-response trips to any ICB stops that are in their service area. FTHRA specifically mentioned that they also connect passengers to the Greeneville ICB stop that originate their trip outside of the FTHRA service area with a different rural transit agency.

Agencies universally stated that they would require additional funding to begin providing feeder services without reducing general public transit service.

### *Urban Transit Providers*

The urban transit provider portion of the survey focused primarily on coordination efforts with ICB providers. Murfreesboro Transit stated that they currently do not coordinate with ICB providers, do not plan to coordinate in the future, and are not planning to coordinate on facility access to the Murfreesboro Transit hub.

Meanwhile, MATA reported success in its coordination with ICB providers, especially regarding its Airways Transit Center. MATA detailed the strong connections between local bus trips and ICB trips, the ability to generate additional revenue from the lease agreement, and the fact that the transit center has been maintained well with all leaseholders. MATA is interested in continuing this partnership and expanding its coordination efforts with rural transit providers and ICB providers, especially in preparation for Blue Oval City.

### *Charter Companies*

Charter providers were not initially included in the provider survey but expressed a desire to be included in the needs assessment and in future planning efforts. As such, the survey was opened to charter providers interested in providing ICB service.

Charter companies noted the following ICB connections that are needed:

- Lawrenceburg to Nashville
- Martin to Nashville
- Martin to Memphis
- Johnson City to Morristown
- Morristown to Knoxville

Etheridge and Savannah were also highlighted as needing ICB service.

### **6.3.6. Stakeholder Survey**

An online survey of ICB, public transit stakeholders, and the general public was conducted to gather information on ICB needs throughout Tennessee. Available via Microsoft Forms, this survey was available between February 27, 2024, and April 30, 2024, and received 328 responses. The general public was asked to respond on their own behalf, while other stakeholders, which were generally organizations, were asked to respond on behalf of their clients or communities.

A broad array of subjects related to intercity and public transit were covered in the survey, including the following:

- Respondent's information and background
- Current usage of ICB services
- Desired usage of ICB services
- Challenges in using ICB services, including accessibility issues
- Desired improvements to ICB usage in Tennessee

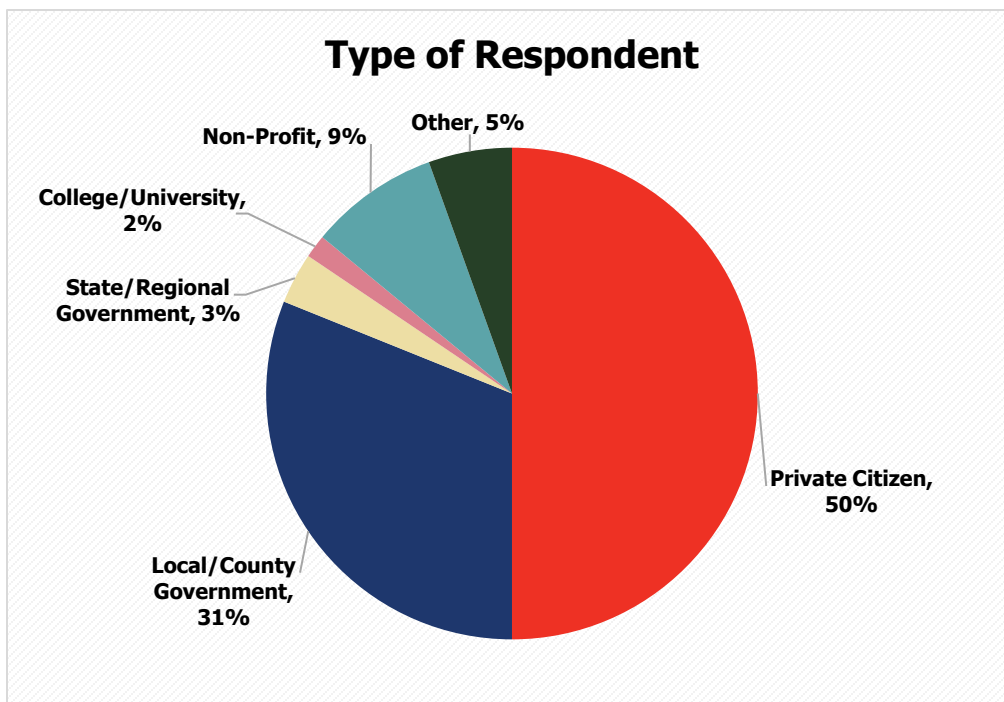
- Importance to respondents of increasing ICB service in their community; alternatively, the value of ICB service that is currently provided in a respondent's community

This section describes the stakeholder survey's primary findings, including a discussion of specific questions and associated responses underlying the findings. Questions are sorted into specific sections according to their overall theme or subject matter.

### *Respondent Information*

**Figure 6-10** illustrates the types of respondents to the stakeholder survey. Private citizens and local/county governments comprise the vast majority of respondents, with 50 percent and 31 percent of responses, respectively. Among local/county governments, representatives of town, city, and county governments were the primary responses, with additional representation from stakeholders such as public libraries, schools, and airports. Among respondents indicating "Other," chambers of commerce were the most common respondents.

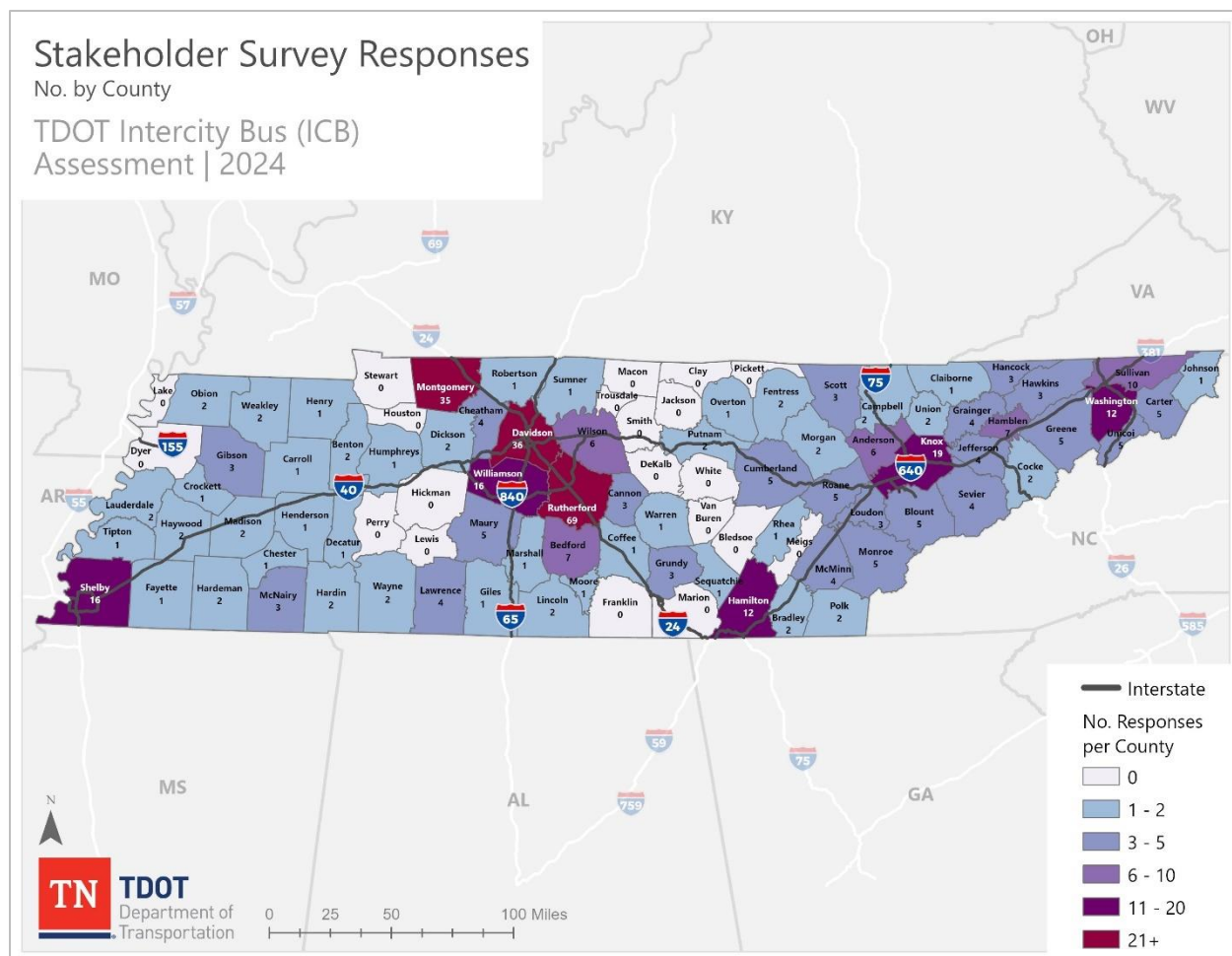
*Figure 6-10: Stakeholder Survey Respondents by Type*



The survey also collected information on which county respondents either reside in themselves or which county their clients or community reside in, as illustrated in **Figure 6-11**. Respondents were primarily from counties containing Tennessee's major urban areas, namely Davidson (Nashville), Hamilton (Chattanooga), Knox (Knoxville), Montgomery (Clarksville), Rutherford (Murfreesboro), Shelby (Memphis), and Washington (Johnson City). Among counties with no respondents to the stakeholder

survey, many are located in the east-central portion of Tennessee, between Nashville and Knoxville, and north and south of I-40.

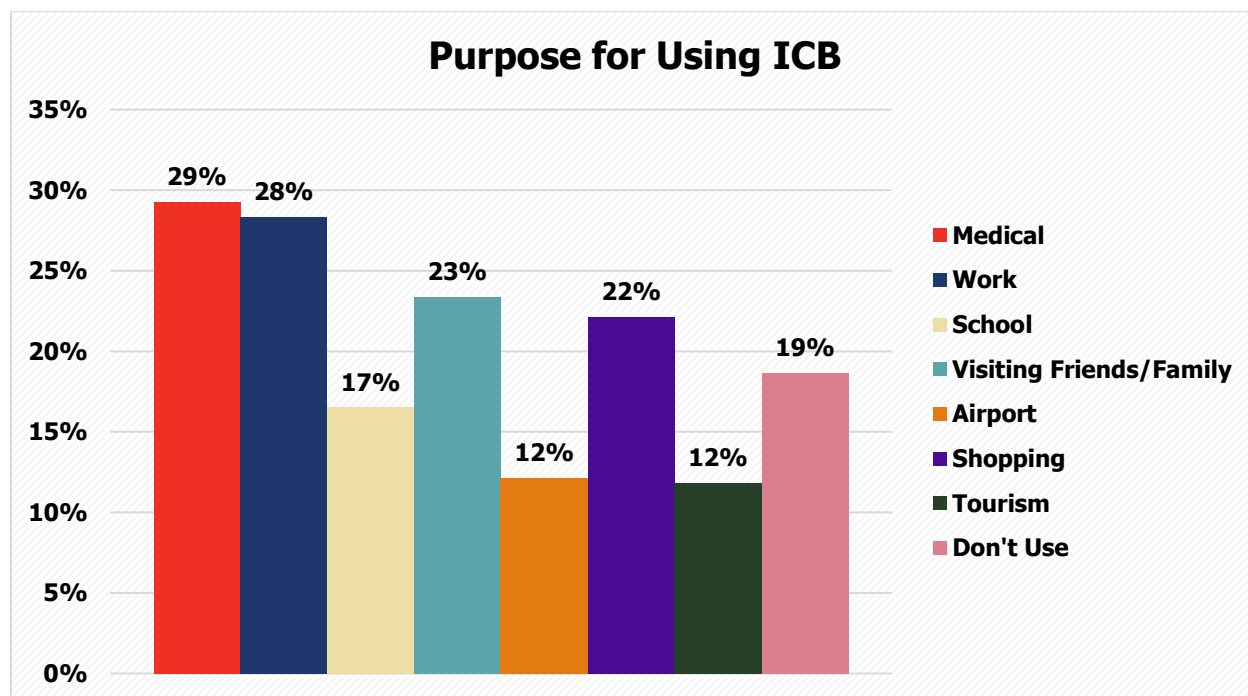
*Figure 6-11: Stakeholder Survey Responses by County*



Finally, respondents were asked to report the purposes for which they currently use ICB service, including if they do not use ICB service at all (see **Figure 6-12**). Respondents could select multiple options if they use ICB service for multiple purposes. The percentages in **Figure 6-12** represent the percentage of respondents who selected each response. Medical and work-related purposes were the most common, with 29 percent and 28 percent of respondents selecting these options, respectively. 19 percent of respondents indicated that they do not use ICB services.

Through conversations with stakeholders during the Stakeholder Consultation Meeting, it was clear that stakeholders struggle to distinguish between general public transit and ICB services. For example, an individual may presumably use ICB services to attend a job interview in a distant location. Still, ICB services are rarely structured in such a way that they meet everyday work commuting needs. As such, making specific conclusions about the purposes for which respondents use ICB is challenging.

*Figure 6-12: Purposes for Using ICB*



### *Intercity Bus Challenges and Unmet Needs*

Respondents were asked questions related to cases when existing ICB service has not met their mobility needs, including why they could not complete specific trips and if there were any accessibility challenges with using ICB service in Tennessee.

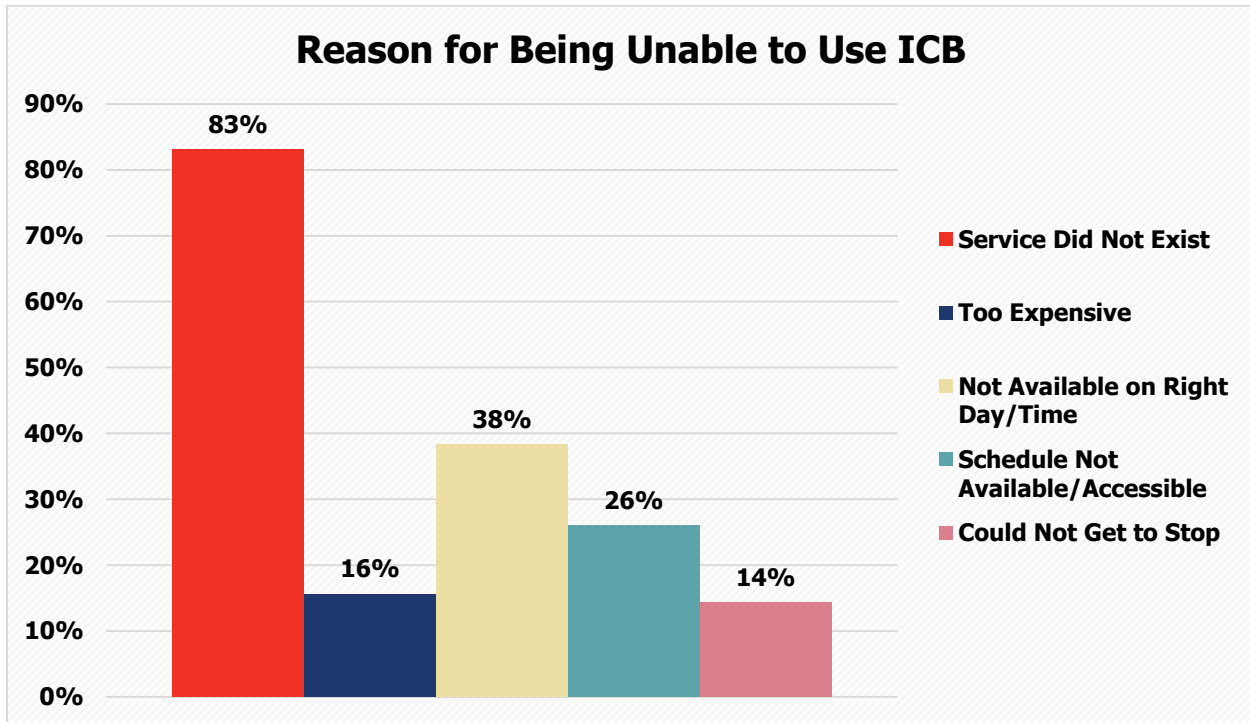
**Figure 6-13** below summarizes respondents' reasons for being unable to use ICB in cases where they have wanted to, with the percentages representing the percentage of respondents to this question selecting a certain response (respondents could select multiple responses). Overwhelmingly, the primary reason respondents say they have been unable to use ICB in certain cases is because the service did not exist (83 percent of respondents). The second most common reason, at 38 percent of respondents, was that the service was not available at the right time or on the right date.

Each of these findings underscores the importance of service existing in the right places and times, such that the needs of current and prospective riders are met. In multiple parts of Tennessee, existing intercity service runs once per day and often at unconventional travel times (e.g., late nights and early mornings), such that use of the service may be difficult to justify in comparison to other options.

Simultaneously, addressing a lack of ICB service may not always be in TDOT's control, given that many ICB trips involve interstate travel. Thus, prospective riders may have specific needs in terms of final destination outside Tennessee, over which Tennessee has no say outside of regional ICB planning processes (which do not currently exist between Tennessee and surrounding states).

Few respondents left written responses after selecting the "Other" option, though respondents who did comment focused primarily on inconvenient schedules and dissatisfaction with the cleanliness of vehicles.

*Figure 6-13: Reason for Being Unable to Use ICB (Percent of Responses Received)*



Respondents were also asked to describe how "accessible" they believe ICB services are to individuals with disabilities and older adults. Given that this question asked for written responses, key themes that emerged are presented below:

- **Lack of Stops:** A lack of stops altogether was commonly mentioned by respondents to this question, highlighting that providing service in the first place is a prerequisite to ensuring that older adults and people with disabilities are served. Older adults and people with disabilities, due to general mobility challenges, tend to face transportation barriers that non-disabled and younger individuals do not face, compounded by a lack of access to ICB.
- **Sidewalk Accessibility:** A lack of sidewalks, bike lanes, and other active transportation infrastructure was highlighted as a barrier to accessing ICB stops. Given reports of ICB providers locating stops well outside downtown cores where active transportation tends to be better connected, this appears to be a pressing concern for current and prospective riders.
- **Drop-Off Locations:** Related to sidewalk accessibility, a lack of convenient stops was commonly reported by respondents to this question, sometimes due to providers relocating stops from downtown cores to outlying portions of

communities that are generally more difficult to access, especially for older adults and people with disabilities.

### *Desired Intercity Bus Improvements*

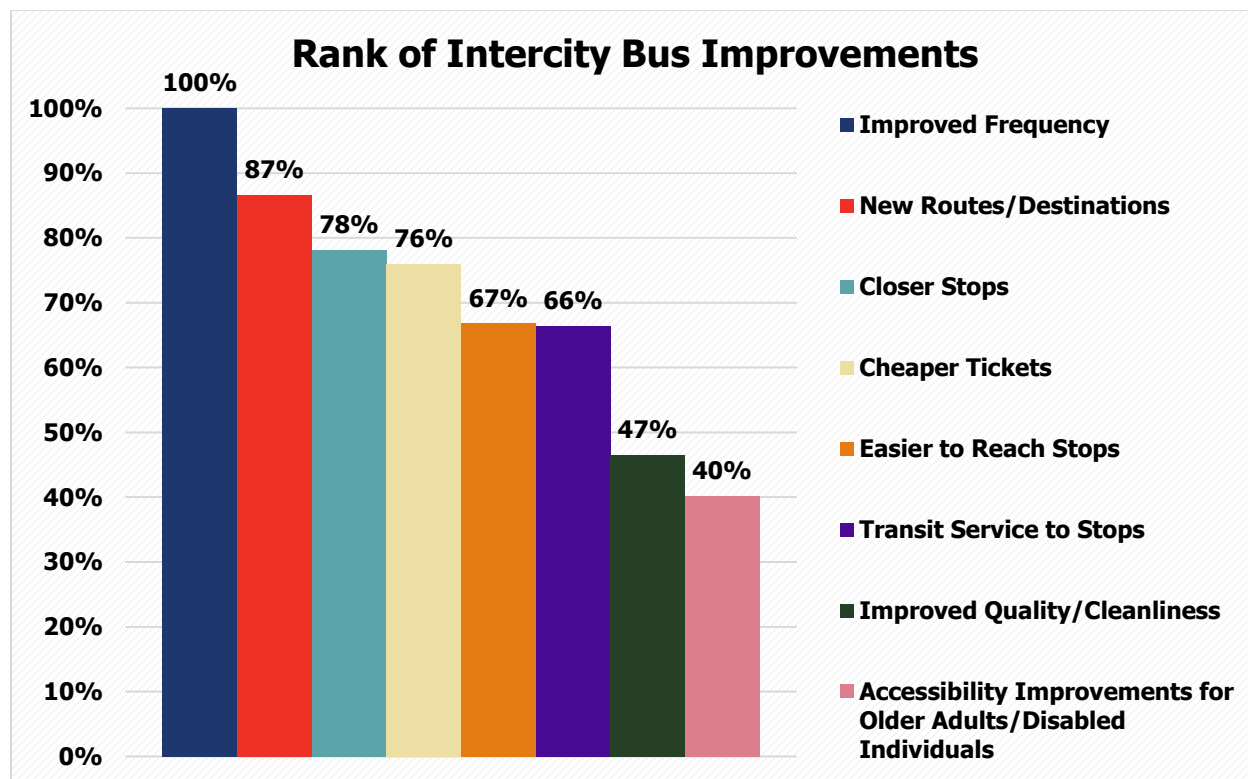
Respondents were asked a series of questions to identify what improvements would entice them to start using ICB services as well as locations that they would like ICB to go to in Tennessee.

**Figure 6-14** summarizes the results of respondents being asked to rank various improvements according to how likely the improvements would be to entice them to start using ICB service. Based on responses, weighted scores were created for each improvement, with more points awarded to an improvement if a respondent ranked it higher versus lower.

The percentages in **Figure 6-14** represent the relative weighted scores for each improvement in comparison to "Improved Frequency," which is 100 percent because it had the highest weighted scores and was, therefore, the priority for survey respondents. "New Routes/Destinations" was the second most prioritized response, while "Closer Stops" and "Cheaper Tickets" were the third and fourth most prioritized, respectively. Continuing the theme in other survey questions, responses related to frequency, stop location, and the existence of routes and stops were top priorities for respondents, underscoring the importance of these factors in making ICB service attractive relative to other modes.

Respondents also had the ability to write in any additional improvements that would entice them to use ICB. Written responses most commonly reinforced the need for service to be provided in new locations or for new routes to be provided, as well as an increase in frequency. Written responses also commonly related to the quality and location of existing stops. Many respondents stated a desire for more permanent stop facilities, such as benches, shelters, and other physical infrastructure. Additionally, respondents often highlighted the inconvenient location of many stops, specifically when stops are located in outlying areas with poor sidewalk and bike lane connectivity.

*Figure 6-14: Rank of Most Desired ICB Improvements  
(Weighted Score Relative to Improved Frequency)*

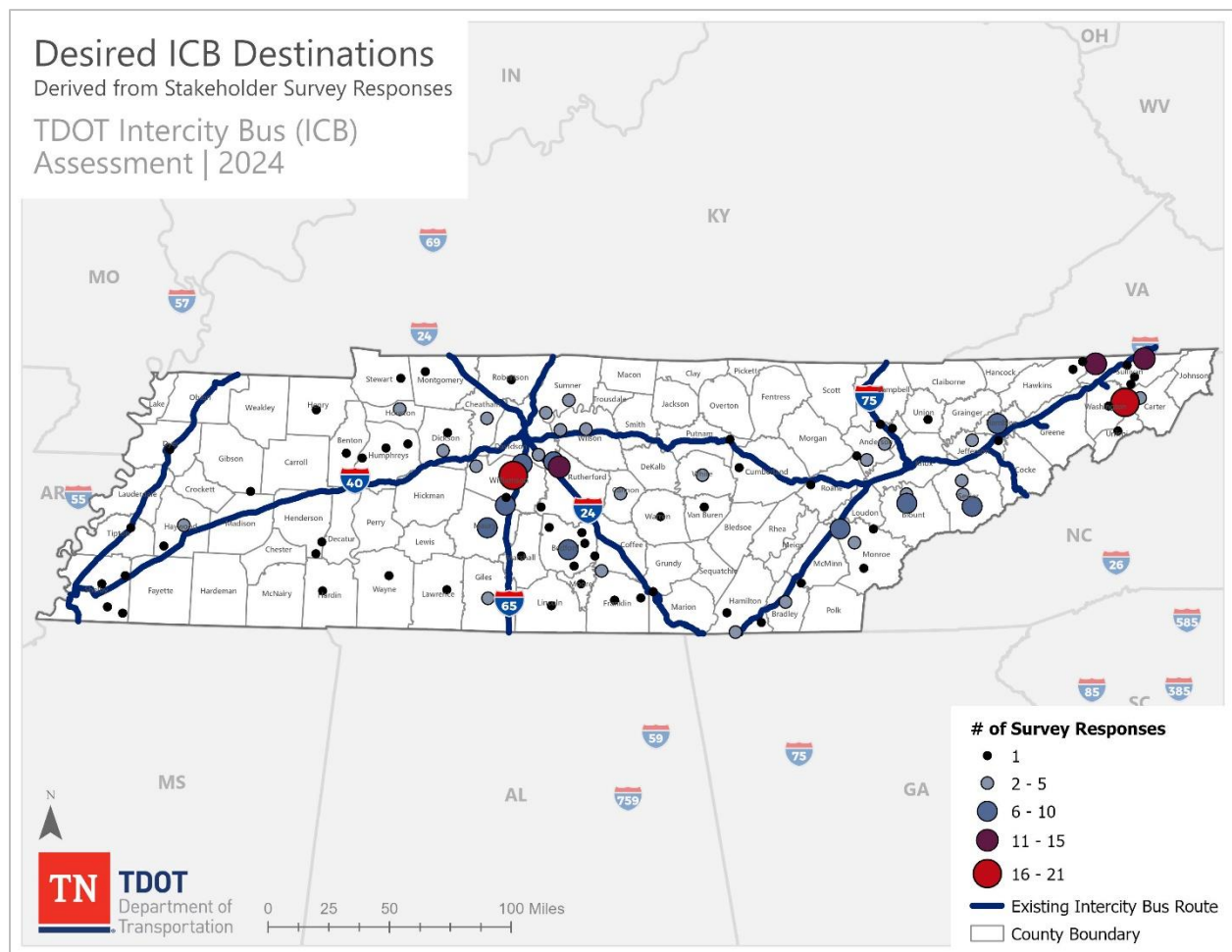


Respondents also had the opportunity to identify specific cities and towns within Tennessee that they would like to travel to via ICB. **Figure 6-15** and **Table 6-4** below display the result of this question, with each dot corresponding to a specific city or town requested by respondents and the number of responses mentioning each one. Many respondents stated they would like to travel to cities or towns with existing ICB service, which may be an indication that the current service does not meet their needs. To specifically focus on areas without service currently, **Figure 6-15** does not include cities and towns with existing service from interlining carriers. Similarly, cities and towns with existing service from interlining characters are highlighted in **Table 6-4** to distinguish them from cities and towns without service.

The outlying towns and cities surrounding Nashville (e.g., Smyrna and LaVergne) and the Tri-Cities (Bristol, Johnson City, Kingsport) were the most common locations that respondents indicated they would like to go to where service did not already exist. Notably, the Tri-Cities had ICB service in the recent past that was discontinued. Additionally, respondents commonly mentioned Morristown, which had ICB service discontinued recently.

When considering cities and towns that already have ICB service, Nashville, Knoxville, Chattanooga, Murfreesboro, and Memphis were the top five (5) responses, with a likely contributor being that each of these cities represents the most major population centers in the state. These cities receiving so many responses highlight their importance as central transfer and connection hubs in the ICB network. Additionally, despite these cities already having service, it may be the case that the current level of service, frequency, or some other factor makes ICB service less attractive than other modes, thus their mention by survey respondents.

*Figure 6-15: Desired ICB Destinations (# of Survey Responses, Existing Stops Excluded)*



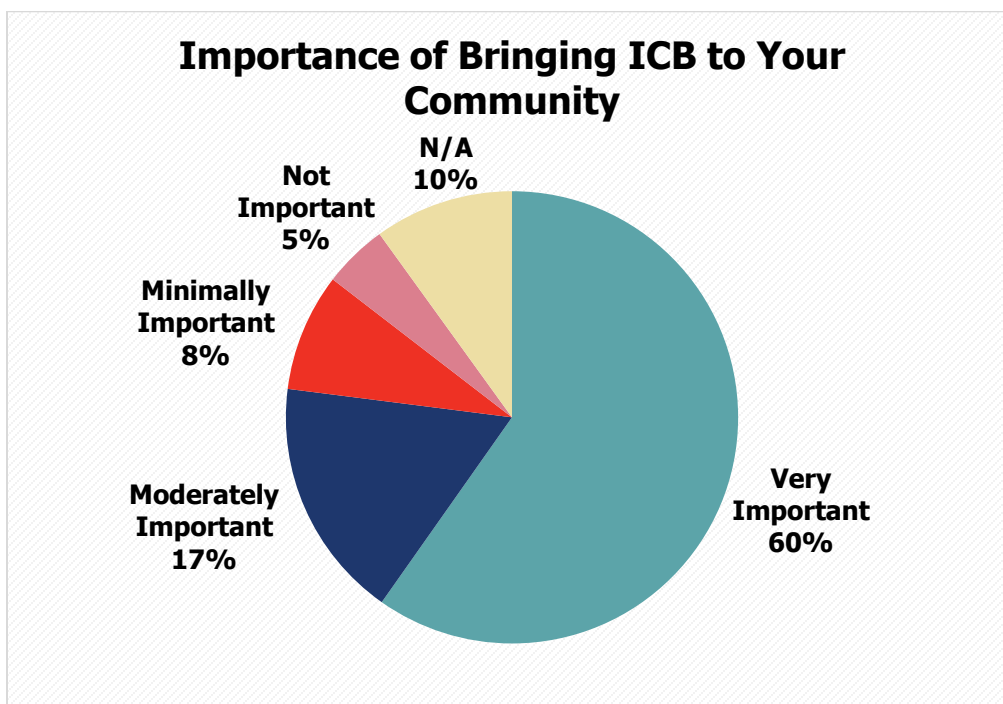
*Table 6-4: Desired ICB Destinations  
(# of Survey Responses, Existing Stops Highlighted)*

City/Town	# of Responses	City/Town	# of Responses	City/Town	# of Responses
<b>Nashville</b>	<b>77</b>	Woodbury	3	Maynardville	1
<b>Knoxville</b>	<b>45</b>	Alcoa	2	McEwen	1
<b>Chattanooga</b>	<b>43</b>	Ashland City	2	McMinnville	1
<b>Murfreesboro</b>	<b>30</b>	Brownsville	2	Medina	1
<b>Memphis</b>	<b>29</b>	East Ridge	2	Monterey	1
Franklin	21	Erin	2	Mount Carmel	1
Johnson City	16	Fairview	2	Monteagle	1
Bristol	13	Gallatin	2	New Johnsonville	1
Kingsport	13	Hendersonville	2	Normandy	1
Smyrna	12	Jefferson City	2	Norris	1
Brentwood	10	Madisonville	2	Oliver Springs	1
La Vergne	9	Sevierville	2	Paris	1
Morristown	9	Sparta	2	Piney Flats	1
<b>Clarksville</b>	<b>8</b>	Arlington	1	Pleasant Hill	1
Gatlinburg	8	Bartlett	1	Red Bank	1
Columbia	7	Bell Buckle	1	Rockwood	1
<b>Jackson</b>	<b>7</b>	Blountville	1	Rocky Top	1
Maryville	6	Bluff City	1	Sardis	1
Shelbyville	6	Camden	1	Savannah	1
Spring Hill	6	Charleston	1	Scotts Hill	1
Sweetwater	6	Charlotte	1	Sewanee	1
Tullahoma	5	Church Hill	1	Spencer	1
<b>Crossville</b>	<b>4</b>	Collegedale	1	Springfield	1
Lebanon	4	Collierville	1	Stanton	1
Oak Ridge	4	Covington	1	Tellico Plains	1
Antioch	3	Dyersburg	1	Thompson's Station	1
<b>Athens</b>	<b>3</b>	Eagleville	1	Unionville	1
Cleveland	3	Erwin	1	Vonore	1
Clinton	3	Fayetteville	1	Wartrace	1
<b>Cookeville</b>	<b>3</b>	Flat Creek	1	Waverly	1
Dickson	3	Germantown	1	Waynesboro	1
Elizabethton	3	Indian Mound	1	White Pine	1
<b>Greeneville</b>	<b>3</b>	Jonesborough	1	Winchester	1
Mount Juliet	3	Lawrenceburg	1	Woodlawn	1
Pigeon Forge	3	Lewisburg	1	<b>Existing Stop</b>	
Pulaski	3	Lynchburg	1		

### *Importance and Value of Intercity Bus Service*

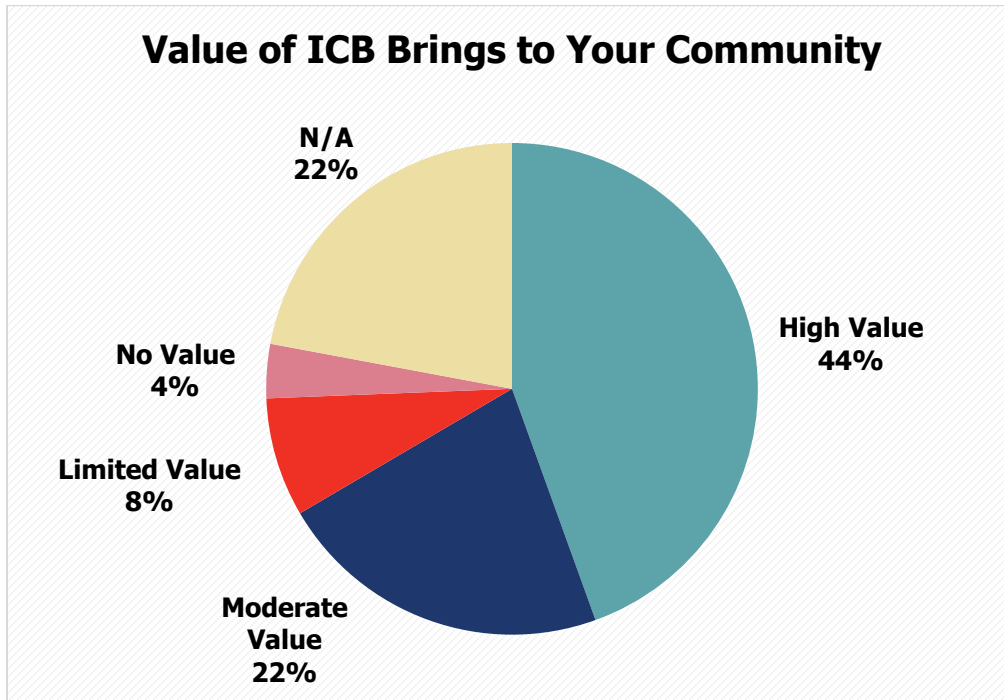
Stakeholder survey respondents were also asked to rate the importance of bringing ICB service to their community if it is not currently served; see **Figure 6-16** below. A majority of respondents noted that it was "Very Important" to bring ICB to their community, while 17 percent stated it was "Moderately Important." Taken together, 77 percent of respondents stated that bringing ICB to their community was at least "Moderately Important."

*Figure 6-16: Importance of Bringing ICB to Respondent's Community*



Similarly, respondents were asked to rate the value that ICB brings to their community if it is currently served (see **Figure 6-17**). Forty-four (44) percent of respondents stated that ICB brings "High Value" to their community, while 22 percent stated, "Moderate Value." Twenty-two (22) percent of respondents also responded "N/A," interpreted as their community not currently served by ICB; therefore, this question does not apply to them.

*Figure 6-17: Value ICB Brings to Respondent's Community*



## 7. Conclusions & Recommendations

Intercity bus services are an important general public mode linking most rural and urban areas. As such, they play an integral role in the State of Tennessee's surface transportation network. However, ICB services have markedly declined in Tennessee and across the nation due to the effects of the COVID-19 pandemic.

Under Section 5311, the FTA requires that all state programs receiving funds use 15 percent of their annual total Section 5311 funding allocation for rural intercity bus projects unless the state determines that there are no unmet needs for rural intercity bus assistance. That assistance can be provided through capital, operating, administrative, and/or project administration assistance. If it is found that there are no needs for rural intercity bus assistance, the state can certify to the FTA that there are no unmet rural ICB service needs and use the funding for other rural public transportation projects. If a state identifies a need for rural ICB assistance that requires less than 15 percent, it can submit a partial certification to FTA, freeing the state to use a portion of the 15 percent ICB allocation for other rural needs. Additionally, the federal regulations state that **"the assessment of intercity bus needs may be made relative to other rural needs in the state."**

This study relied on a literature review, an inventory of existing ICB services, and the identification of unmet needs through geospatial analysis, demographic indicators, and solicitations of needs and interest from local communities, rural transit providers, and ICB providers within the State of Tennessee.

### 7.1. Status of Intercity Bus Needs Relative to Rural Public Transit Needs

The primary purpose of this assessment was to investigate the level of intercity bus service in Tennessee with respect to intercity bus needs and the needs of rural public transit agencies and users in accordance with the requirements established in FTA Circular 9040.1G. **Based on this assessment, intercity bus needs are being adequately met throughout Tennessee relative to the needs of rural public transit agencies and users.** This determination is based upon the following factors:

- Approximately 82 percent of the population of Tennessee lives within a 25-mile catchment area surrounding an intercity bus stop.
- Nearly all of the areas within Tennessee with the largest concentration of transit-dependent populations are within a 25-mile catchment area surrounding an intercity bus stop.
- Nearly all of the largest concentrations of trip generators within Tennessee are within a 25-mile catchment area surrounding an intercity bus stop.

- Many rural transit providers stated that current rural public transit funding levels, including COVID-relief funding, are not sufficient to return to pre-pandemic service levels. Thus, using even a portion of the 15 percent 5311(f) set aside for intercity bus services would increase the likelihood that pre-pandemic rural transit service levels would never return.<sup>24</sup>
- Rural transit providers commonly reported that current funding levels are not sufficient to pay employees competitive wages, offer competitive benefits, fulfill all trip requests, and appropriately maintain or replace revenue vehicles.
- Stakeholders and the general public frequently requested improvements to general public transit services when prompted for improvements to intercity bus services.
- The most commonly desired destinations for intercity bus services by stakeholders and the general public already have intercity bus services (i.e., Nashville, Knoxville, Chattanooga, Murfreesboro, and Memphis).

Given the aforementioned factors, this report recommends the issuance of a Governor's certification that intercity bus needs are being adequately met in Tennessee.

## 7.2. Other Recommendations

While TDOT concludes that intercity bus needs are being adequately met in Tennessee, it recognizes the value that intercity service provides to Tennesseans and that it may need to play a greater role in facilitating access to intercity bus services. As such, this report identifies the following recommendations regarding how intercity bus service can be improved in Tennessee.

### 7.2.1. Recommendation #1: Actively facilitate coordination between intercity bus providers, municipalities, and transit agencies, particularly regarding public facilities access.

Access to transit centers and other public facilities for intercity buses was identified as a major barrier by intercity bus providers and transit agencies alike. Without the ability to stop in convenient, centrally located areas, intercity buses are pushed to inconvenient, outlying areas, making the service less competitive as a result.

The state DOT playing a facilitation role between intercity bus providers, municipalities, and transit agencies has worked successfully for states such as Virginia and Washington, which can be a model for TDOT. In these states, intercity bus program managers meet with local jurisdictions, alongside intercity bus providers, to ensure that the state's interest in the success of the intercity bus program is known.

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<sup>24</sup> TDOT typically seeks the Governor's certification that intercity bus needs are being adequately met, thus the 15 percent 5311(f) set-aside is typically awarded to rural public transit providers.

TDOT may utilize the Office of Mobility & Accessible Transportation and the Planning Division's Office of Community of Transportation (OCT) as a resource, given its close relationships and frequent interactions with local jurisdictions and transit agencies.

The Tri-Cities (Bristol, Kingsport, and Johnson City), Chattanooga, Knoxville, and Nashville should be of primary concern for TDOT because each of these cities has lost service, is currently being negatively affected, or is at risk of being negatively affected due to facilities access issues.

Additionally, this report recommends increasing coordination between TDOT, ICB providers, and local transit agencies. Meeting at least annually outside of the needs assessment will facilitate improved communication, build the strength of Tennessee's ICB program, and identify needs and solutions more effectively. This coordination is an important first step to potentially building a state-sponsored program.

#### **7.2.2. Recommendation #2: Commission a study investigating a potential state-contracted intercity bus service in Tennessee.**

In response to recommendations made by the TACIR report, this report recommends further study of potential intercity bus corridors in the state, similar to explorations conducted by Virginia and Washington, as described in **Section 4** of the report. TDOT could play a greater role in the provision of intercity bus service in Tennessee, which may include an intercity bus service operated by an existing intercity bus provider but funded and managed by TDOT.

A follow-up study on state-contracted intercity bus service should include, at minimum, the following components: potential routes/corridors, demographic analysis, ridership estimates, cost and revenue estimates, labor requirements, performance measure estimates (e.g., farebox recovery), model timetables, and identify potential federal, state, and local funding sources.

#### **7.2.3. Recommendation #3: Increase coordination between TDOT Multimodal and comparable staff in surrounding state DOTs.**

Increased coordination between TDOT Multimodal and surrounding state DOTs may help alleviate multiple challenges highlighted during this assessment and support the other recommendations:

- Should TDOT establish a state-contracted intercity bus program, coordination with surrounding states could enable interstate routes and associated cost-sharing by multiple state DOTs.<sup>25</sup>

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<sup>25</sup> WSDOT coordinates with the Oregon Department of Transportation to share costs on intercity bus routes that serve both states.

- Increased coordination supports compliance and oversight, such as monitoring if ICB providers are using Tennessee service as in-kind match in other states.

**7.2.4. Recommendation #4: Revisit the eligible activities for TDOT's 5311(f) American Rescue Plan funding to support intercity bus providers' current needs.**

TDOT has awarded the \$2,912,502 in American Rescue Plan funding to Greyhound and Miller to offset network losses due to the pandemic. This report recommends that TDOT revisit with both Miller and Greyhound to determine if the ARP funds could be used to re-establish some of the closed facilities in Tennessee. Re-opening facilities along existing routes would enhance access to the national intercity bus network.

## 8. Appendices

Items will be included in the final document:

- Comprehensive survey graphics
- Meeting notes/minutes
- Email notifications sent to providers and stakeholders
- PDF or Excel of stakeholder lists