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July 10, 2007

FHWA-2007-28076-4

Ms. Heather Contrino
 U.S. Department of Transportation
 400 7th St. SW
 Nassif Building, Room PL-401
 Washington, DC 20590-0001

via fax: 202-493-2251

RE: Request for comments regarding reinstatement of the National Household Travel Survey

Dear Ms. Contrino,

On behalf of the Metropolitan Policy Program (MPP) of the Brookings Institution, I am pleased to respond to the notice in the May 11, 2007 Federal Register seeking comments regarding plans for the 2008 National Household Travel Survey (NHTS).

MPP promotes innovative solutions to help the nation's metropolitan communities grow in more inclusive, competitive, and sustainable ways. From this perspective, efficient, cost-effective transportation networks are vital to the health and well-being of metropolitan areas. Understanding how well that system operates is of the utmost importance. The critical value of the NHTS is in demonstrating the effects of household travel on metropolitan transportation networks' reliability and efficiency; in so doing, it helps policymakers make informed decisions about appropriate investments in local and regional transportation networks. As the only national survey to collect non-work, personal travel data, the NHTS has proven to be worth far more than its cost.

Valuable specific roles for NHTS include the following:

- NHTS data are used in studies on trip chaining, traffic safety, energy use, and the relationship between socioeconomic characteristics and travel patterns.
- As the nation's baby-boom generation reaches retirement age, we expect that NHTS data will prove valuable in determining the transportation needs of an aging population.
- In regions needing to address traffic congestion and poor air quality, NHTS data can be used to model alternative future travel demand scenarios and so guide transportation planning accordingly.
- Of particular value to metro areas, the NHTS transferability model (modeled estimates for census tracts and TAZs using NHTS sample data and census "long form" data) has proven to be a useful tool in transportation modeling and planning. In

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an era of dwindling resources for surveys, we believe that the NHTS transferability model holds great promise for creating reliable, synthetic data for travel modeling purposes.

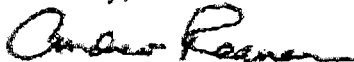
In light of the various important uses of NHTS, MPP strongly endorses the intent of the Federal Highway Administration (FHWA) to conduct the 2008 NHTS. Moreover, we support FHWA efforts to increase the number of add-on surveys to the 2008 NHTS. The data from those surveys will prove invaluable to travel models in those states and regions that paid for them. At last count, the agency has secured commitments for double the number of add-on surveys it conducted in the last NHTS in 2001. At the same time, we urge that add-on surveys not be used in lieu of a full, national survey of 25,000 households; the add-ons cannot replace a national survey with a sample that reflects the nation as a whole.

While we are pleased to support the FHWA in conducting the NHTS in 2008, we have several concerns about the commitment of the Department of Transportation (DOT) to the program. DOT has conducted personal travel surveys on an intermittent, ad hoc basis for some time. As a result, it appears, funding for such surveys has been difficult to come by, with the consequence that the quality and scope of the surveys has diminished over time. In 1995, the Bureau of Transportation Statistics spent \$18 million on the American Travel Survey to collect valuable intercity travel data from 67,000 households; in the same year, the FHWA spent \$4.1 million to survey 21,000 households for the Nationwide Personal Transportation Survey. In 2001, the two surveys were combined into a single, 25,000-household survey costing \$10.3 million, with disappointing results regarding the intercity travel data. The 2008 national NHTS without intercity travel data is estimated to cost \$5.9 million (with consideration of cutting costs to \$4.3 million by using the add-on surveys from states and regions as part of the national survey rather than keeping them as supplements).

To produce the travel data needed by transportation planners charged with wisely spending hundreds of billions of government funds, we encourage DOT and the FHWA to make a commitment to fully fund personal travel surveys on a fixed and more frequent schedule and with sufficient sample size. A regularly scheduled survey conducted every few years would allow for more appropriate use of time series data. In addition, a long-term commitment to a regular schedule would enable the replacement of the current ad hoc funding mechanism, which often leads to last-minute decisions about the survey's future and its content, a process not conducive to producing the needed data.

To reiterate, MPP strongly supports the 2008 National Household Travel Survey with the national-level survey intact. We hope you find our comments of value, and thank you for the opportunity to provide them.

Sincerely,



Andrew Reamer, Fellow
Metropolitan Policy Program