NEW CASTLE AREA TRANSIT AUTHORITY TITLE VI POLICY AND COMPLAINT PROCESS, REVISED 2018

The New Castle Area Transit Authority (NCATA) grants equal access to its programs and services to all citizens. This document serves to make citizens aware of their rights to such access, and serves to educate citizens so that they may understand the civil rights laws that protect their receipt and benefit of such services as defined by Title VI of the Civil Rights Act of 1964.

WHAT IS TITLE VI?

Title VI is a section of the Civil Rights Act of 1964 requiring that "No person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance" Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit genderdiscrimination or other forms of protected activity.

NCATA has reviewed the demographics in its service area and the demographics have not changed since 2014 when its original Title VI Plan (the "Plan") was adopted. However, this revised Plan is intended to acknowledge new services that may be available to NCATA's existing constituents.

NCATA'S TITLE VICOMPLAINT AND INVESTIGATION PROCEDURES

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 for alleged discrimination in any program or activity administered by the New Castle Area Transit Authority.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and NCATA may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file separate complaints.

1.) A formal complaint must be filed within 180 calendar days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompanyall complaints. AnNCATA Title VI complaint form can be found at the end of this document. NCATA encourages individuals to submit Title VI complaints in writing using this form and mailing it to:

Title VI Coordinator New Castle Area Transit Authority 311 Mahoning Ave. New Castle, PA 16102

- 2.) In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to NCATA Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and NCATA Title VI Coordinator will assist the complainant in completing a written statement.
- 3.) In the event of a case where the complainant needs assistance in coordinating the complaint process, but English is not the complainant's primary language, a service will be provided to provide language assistance in completing your complaint.
- 4.) When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant, within ten (10) calendar days by registered mail or hand delivery.
- 5.) If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided sixty (60) calendar days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
- 6.) Within fifteen (15) calendar days from receipt of a complete complaint, NCATA will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) calendar days of this decision, the Transportation Director or his/her authorized designee will notify the Complainant and Respondent, by registered mail or hand delivery informing them of the disposition.
 - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
 - b. If the complaint is to be investigated, the notification shall state the grounds of NCATA's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 7.) When NCATA does not have sufficient jurisdiction, the Transportation Director or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holdingsuchjurisdiction.
- 8.) If the complaint has investigative merit, the Transportation Director or his/her authorized designee will instruct the Title VI Coordinator to fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be submitted to the Transportation Director within sixty (60) days from receipt of the

complaint. The report will include a description of the incident, summaries of all persons interviewed, and a finding with recommendations and proposed resolution where appropriate. If the investigation is delayed for any reason, the Title VI Coordinator will notify the appropriate authorities, and an extension will be requested. During the investigation process, a Language Service will be used, as necessary, to ensure that a complete investigation occurs, including the use of the service for any witness interviews.

- 9.) The Transportation Director or his/her authorized designee will issue letters of finding to the complainant and Respondent within sixty (60) days from receipt of the complaint.
- 10.) If the Complainant is dissatisfied with NCATA's resolution of the complaint, he/she has the right to file a complaint in the time allotted by law with:

Federal Transportation Administrator Attn: Civil Rights Officer 1760 Market Street Philadelphia, PA 19103

FTA Complaint procedures can also be found on the FTA website at www.fta.dot.gov. These procedure are also outlined in the FTA Circular 4702 1A, Chapter IX.

EQUITY ANALYSIS/COMMITTEES

At the current time NCATA does not have any contracted facilities that would fall within the provisions of Title VI. When, and if they do, have any contracted facilities NCATA will provide the Department with a Title VI analysis immediately and otherwise comply with the provisions that are required by Title VI.

At the present time NCATA does not have any non-elective committees. In the event that NCATA would ever form any non-elective committees NCATA will inform the Department immediately by depicting the committees broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees.

When and if an equity analysis and/or non-elective committees are formed, the Propio Language Service referenced herein, will be utilized to ensure participation by all protected groups under Title VI.

Plan will be adopted by the Board with a Resolution at the August 29,2018 Board Meeting.

TITLE VI

COMPLAINT FORM

If you would like to submit a Title VI Complaint to New Castle Area Transit Authority, please complete the form below and return to: NCATA, Attention: Title VI Coordinator, 311 Mahoning Avenue New Castle, PA 16102. For questions, please contact NCATA at 724-654-3130.

2. Phone:		3. H	3. Home Address (street #, city, state, zip code):					
	ne name of the per iscriminated again		5. Date of the incident:					
6. Discrimination	n based on (please	check all tha	at apply):					
Race	Color	Nationa	l Origin					
		-	feel you were discriminated against. Ited differently than you.					

1	
9. Is there any other information that you feel may be	relevant to this investigation?
10. How can these issues be resolved to your satisfaction	n?
11. Please list any person(s) who we can contact for add support/clarify your complaint:	itional information or to
Name: Address:	Phone Number:
12. Have you filed this complaint with any other federal	state or local agency or with any
federal or state court?	, state, or local agency, or with any
Yes No	
If yes, circle all that apply:	
Federal Agency Federal Court	State Court State
Agency Local Agency	
If filed at an agency and/or court, please provide infor	mation on a contact personat that
Agency/Court: Agency/Court Contact's Name: Address:	PhoneNumber:
rigency/ court Contact's Ivame. radiess.	Thonesvamber.
Signature (Complainant):	Date of Filing:

Introduction

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964-National Origin Discrimination against Persons with Limited English Proficiency." (See 65 FR 50123, August 16,2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination. Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as the New Castle Area Transit Authority (NCATA) and governments, private and non-profit entities, and sub recipients.

Plan Summary:

NCATA has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to NCATA services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the NCATA's extent of obligation to provide LEP services, NCATA conducted a U.S. Department of Transportation four factor LEP analysis which

considers the following: 1) The number or proportion of LEP persons eligible in the NCATA service area who may be served or likely to encounter an NCATA program, activity, or service; 2) the frequency with which LEP individuals come in contact with NCATA services; 3) the nature and importance of the program, activity or service provided by the NCATA to the LEP population; and 4) the resources available to the NCATA and overall costs to provide LEP assistance.

The LEP analysis was initially performed in 2014 as part of NCATA's Title VI Plan ("Plan"). As part of this revision, NCATA has analyzed the same information and data. No changes in demographics or population has occurred in NCATA's service area since the initial 2014 Plan. However, NCATA incorporates the steps that it performed as part of this update.

A brief description of these considerations is provided in the following section.

Four Factor Analyses

1. The number or proportion of LEP persons eligible in the NCATA service area who may be served or likely to encounter a NCATA program, activity, or service.

The NCATA examined the US Census report from 2010, and, using data from Census tracts in the NCATA service area, was able to determine that approximately 95.3% people within NCATA 's service area spoke only English. Approximately .01% speak a language other than English. Of the people reporting they speak other languages than English, 1.0% of respondents speak Spanish. Of the people reporting they speak other languages than English, 3.4% of respondents speak Indo-European. Of the people reporting they speak other languages than English, 0.2% of respondents speak Asian and Pacific Islander.

2. The frequency with which LEP individuals come in contact with an NCATA program, activity, or service. NCATA assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes documenting phone inquiries and surveying drivers and customer service personnel.

NCATA has had no requests for interpreters and zero requests for translated NCATA documents. NCATA staff and drivers have had very little to no contact with LEP individuals.

3. The nature and importance of the program, activity, or service provided by the NCATA to LEP community. There is no large geographic concentration

of any one type of LEP individuals in the NCATA service area.

The overwhelming majority of the populations, 95.3% of residents speak only English. Therefore, for the most part, LEP individuals do not use NCATA's LEP services.

4. The resources available to NCATA and overall costs NCATA assessed its available resources that could be used for providing LEP assistance.

NCATA included identifying costs associated with subscription to the Language Line service, the costs of additional translation services such as a professional interpreter on an as needed basis, which documents would be the most valuable to be translated if and when the populations supports, taking an inventory of available organizations that NCATA could partner with for outreach and translation efforts, and what level of staff training is needed.

After analyzing the four factors, the NCATA developed the planoutlined in the following section for assisting persons of limited English proficiency at a low cost.

New Castle Area Transit Authority Service Standards and Policies

It is the intent of the New Castle Area Transit Authority (NCATA) to ensure full compliance with Title VI Regulations. The information below has been reviewed and adopted as policy by the NCATA Board of Directors at a regularly scheduled meeting on August 29,2018.

Vehicle Load Standard:

NCATA will maintain a vehicle load standard of 1.25 for Low Floor type vehicles 1.25 for all other vehicles operating in fixed route public transportation service. The following vehicle load calculations will be used for vehicles assigned to fixed route service:

Year	Make Model	Seating Capacity	Load Factor	Max Capacity
	See Attached Schedule I			
	Year	See Attached	See Attached	See Attached

Service Types:

NCATA will operate 2 types of fixed route service,

- 1. Half-Hour
- 2. One-Hour

Vehicle Headway:

NCATA will maintain a minimum of 30 minute headways on all fixed routes in City between the hours of 6:00 am – 6:00 pm. Service to county areas and surrounding communities in the corridor is provided with a 60 minute headway NCATA will use load factors from a sample of ridership and locations of major generators such as Medical, University's, Technical Schools, shopping and recreational facilities along each route to establish priorities for service operated at headways shorter than 30 minutes. Routes that demonstrate higher load factors per route verse other routes and have larger concentrations of major generators will be considered for headways shorter than 60 minutes.

On-time performance:

NCATA will consider "on-time" for all fixed routes in operation to be within 5 minutes of scheduled arrival/departure. NCATA will measure on-time performance based on route origin and destination timing. NCATA will strive to maintain 90% on-time performance. On-time performance will be measured by means including, but not limited to, route ride along and/or timed observations at various random stops by supervisors and camera observation.

Service Availability:

NCATA will establish, as a means of service availability, that all fixed routes will maintain a distance no greater than one-third miles between bus stops along the route when possible. NCATA permits flag stop boarding and departures on all rural routes. All base fixed routes

connect at Transfer Center. We provide service where surveys and data indicate a large number of people will utilize this service.

Fixed Route Service Policy

Distribution of transit amenities:

NCATA will establish a minimum standard on all fixed route vehicles to include priority seating for senior citizens and persons with disabilities. All fixed route vehicles less than 28 feet in length will include three surveillance cameras per vehicle, fixed route vehicles with a length 29 feet or longer will include 3 surveillance cameras. All future fixed route vehicles will include 3 installed cameras installed at the time of purchase. All fixed route vehicles will maintain an area inside the vehicle for bus schedules. NCATA will ensure that all Authority-owned bus shelters maintain an area for printed materials such as bus schedules and include covered passenger waiting areas. At the current time, NCATA owns 11 bus shelters within our service area. Bus shelters are currently placed at strategic locations as dictated by ridership and available footprint for installation. NCATA maintains all of its shelters for cleanliness on a weekly basis weather permitting. Public requests for bus shelters locations in the future will be evaluated by reviewing areas of high concentrations of transit-dependent riders for shelters in residential areas and NCATA will review areas of high employment/retail concentrations for bus shelters in commercial areas. All bus shelters owned by NCATA will include covered waiting areas with seating and covered areas for wheelchair access.

Vehicle Assignment:

NCATA will assign vehicles based on ridership counts and routing. Our vehicles will be evenly assigned to each route.

LIMITED ENGLISH PROFICENCY PLAN OUTLINE

How to Identify an LEP Person who Needs Language Assistance Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When NCATA sponsored workshops or informational areas are established to provide information on NCATA's services are

held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply;

- Have the Census Bureau's "I Speak Cards" at the workshops or informational areas sign-in sheet table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the NCATA Transit Center; and
- Survey drivers and other first line staff on an annual basis at the beginning of each fiscal year regarding their experience on having any direct or indirect contact with LEP individuals.

Language Assistance Measures

NCATA has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least "well," and the lack of resources available in the NCATA service area:

• When an interpreter is needed, in person or on the telephone, staff will utilize a language service. All customer service personnel will have the information available for the language service hotline which will provide the appropriate interpreter services. The services will be utilizes for all programs that incorporate the NCATA LEP Plan..

NCATA Staff Training

All NCATA staff will be provided with the LEP Plan and will be educated on procedures to follow. This information will also be part of the NCATA staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities;
- What language assistance services the NCATA offers;
- Use of LEP "I Speak Cards";
- How to use the Language Line interpretation and translation services;
- Documentation of language assistance requests;
- How to reach the Language Services Plan and have readily available the

contact information and call center data for over-the-phone interpretation services;

How to handle a Title VI and/or LEP complaint

Outreach Techniques

NCATA does not have a formal practice of outreach techniques due to the lack of LEP population and resources available in the service area. However, the following are a few options that NCATA will incorporate when and/or if the need arises for LEP outreach:

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop or informational session in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.
- When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into "A (insert alternative Language) translator will be available".
- Key print materials will be translated and made available at the NCATA Transit Center, on board vehicles and in communities when a specific and concentrated LEP population is identified

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. This update is part of that effort which will continue as necessary. At a minimum, NCATA will follow the Title VI Program update schedule for the LEP Plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in NCATA service area?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified NCATA programs? Are there other programs that should be included?

- Have the NCATA 's available resources, such as technology, staff, and financial costs changed?
- Has the NCATA fulfilled the goals of the LEP Plan?
- Were any complaints received?

As part of the monitoring and update plan, NCATA will track and has tracked the activity of usage of its services by LEP persons and requests for assistance from Customer Service and Operator staff, and record information from annual passenger surveys which will identify the language spoken by passengers and their need for assistance. NCATA will also maintain communication with municipalities in its service area at a minimum on an annual basis to identify LEP individuals who may have moved into a part of NCATA 's service area and may require assistance. These municipalities will also be instructed to contact NCATA with any requests that they may receive for language assistance.

Dissemination of the NCATA Limited English Proficiency Plan

NCATA includes the LEP plan on the NCATA website (www.newcastletransit.org) together with its Title VI Policy and Complaint Procedures. The NCATA 's Notice of Rights under Title VI to the public is available in the NCATA Transit Center and on all vehicles. Any person, including social service, non-profit, and law enforcement agencies, along with other community partners with Internet access will be able to access the plan. Copies of the LEP Plan will be provided upon request. LEP persons may obtain copies/translations of the plan upon request.

List of Title VI Investigations/Complaints/Lawsuits

- NONE

Any questions or comments regarding this plan should be directed to the NCATA Title VI Coordinator.

Title VI Coordinator New Castle Area Transit Authority 311 Mahoning Ave. New Castle, PA 16102

48.38.012114/ 12.30.16

NCATA Load Factor - SCHEDULE I

	Unit No.	Veh. ldent. # (serial no.)	License Number	Year	Current Mileage	Passenger Capacity	No. of Wheelchair Positions	Vehicle Length	Series Model	Make	Туре	Date Put In Service (Mo./Yr.)	Gross Vch. Wt. Rating	Load Factor	Max load Capacity	Tag Capacity
L	001	1C9S2HFS41W535237	MT-37006	2001	72,703	27	2	30 feet		Chance	Bus	9/1/2001	27,200	1.25	34	48
2	002	1C9S2HFS41W535240	MT-37253	2001	55,254	27	2	30 feet		Chance	Bus	11/1/2001	27,200	1.25	34	48
3	6005	15GGE291851090709	MT-46925	2005	462,778	28	2	30 teet		Gillig	Bus	7/2005	30,000	1.25	35	48
4	6015	15GGE291451090710	MT-46875	2005	411,480	28	2	30 feet		Gillig	Bus	7/2005	30,000	1.25	35	48
5	6025	15GGE291651090711	MT-46873	2005	406,410	28	2	30 feet		Gillig	Bus	7/2005	30,000	1.25	35	48
6	6035	15GCD211751110879	MT-46923	2005	419,231	45	2	40 feet		Gillig	Bus	7/2005	39,600	1.25	56	60
7	1061	15GCD211161110880	MT-46924	2006	447.838	45	2	40 feet		Gillig	Bus	2/2006	39,600	1.25	56	60
8	8091	15GGE271681091624	MT-46884	2008	443,070	28	2	29 ft LF		Gillig	Bus	11/6/08	30,000	1.25	38	45
9	8092	15GGE271881091625	MT-46883	2008	434,606	28	2	29 ft LF		Gillig	Bus	11/6/08	30,000	1.25	38	45
10	8093	15GGD211781079700	MT-46882	2008	545,746	45	2	40 ft LF		Gillig	Bus	11/6/08	39,600	1.25	49	70
11	8094	15GGD211981079701	MT-46881	2008	513,638	45	2	40 ti LF		Gillig	Bus	11/6/08	39,600	1,25	49	70
12	1071	15GGD2714A1178303	MT-46872	2010	416,801	39	2	40 n LF		Gillig	Bus	8/10/10	39,600	1.25	49	70
13	1072	15GGD2716A1178304	MT-46871	2010	497,838	39	2	40 tt LF		Gillig	Bus	8/10/10	39,600	1.25	49	70
14	1073	15GGD2718A1178305	MT-46860	2010	423,198	39	2	40 ft LF		Gillig	Bus	8/10/10	39,600	1.25	49	70
15	1074	15GGE2713A1091912	MT-46861	2010	383,311	30	2	29 it LF		Gillig	Bus	8/10/10	30,000	1.25	38	42
16	1075	15GGE2715A1091913	MT-46862	2010	343,887	30	2	29 tt LF		Gillig	Bus	8/10/10	30,000	1.25	38	42
17	1076	15GGD211671078321	MT-46863	2007	645,203	39	2	40 feet		Gillig BRT	Bus	8/5/10	39,600	1,25	49	69
18	1077	15GGD211671078334	MT-46888	2007	655,998	39	2	40 feet		Gillig BRT	Bus	8/4/10	39,600	1.25	49	69
19	1331	15GGB3017D1181366	MT-46864	2013	238,840	35	2	35 feet	G30B102N4	Gillig Hybrid BRT	Bus	5/13/13	39,600	1.25	44	71
20	1332	15GGB3019D1181367	MT-46865	2013	227,392	35	2	35 feet		Gillig Hybrid BRT,	Bus	5/13/13	39,600	1.25	44	71
21	1333	15GGB3010D1181368	MT-46866	2013	213,427	35	2	35 feet		Gillig Hybrid BRT	Bus	5/13/13	39,600	1.25	44	71
22	1334	15GGB3012D1181369	MT-46867	2013	209,741	35	2	35 feet	FIG	Gillig Hybrid BRT	Bus	5/13/13	39,600	1.25	44	71
23	1335	15GGB3019D1181370	MT-46868	2013	237,452	35	2	35 feet	G30B102N4	Gillig Hybrid BRT	Bus	5/13/13	39,600	1.25	44	71
24	1561	15GGB3014F1184244	MT-46869	2015	135,411	35	2	35 feet		Gillig Hybrid BRT	Bus	9/23/15	39,600	1.25	44	71
25	1562	15GGB3016F1184245	MT-46870	2015	142,150	35	2	35 feet		Gillig Hybrid BRT	Bus	9/23/15	39,600	1.25	44	71
26	1563	15GGB3018F1184246	MT-46887	2015	130,918	35	2	35 feet		Gillig Hybrid BRT	Bus	9/23/15	39,600	1.25	44	71
27	1564	15GGB301XF1184247	MT-46886	2015	146,300	35	2	35 feet		Gillig Hybrid BRT	Bus	9/23/15	39,600	1.25	44	71
28	1565	15GGB3011F1184248	MT-46885	2015	137,632	35	2	35 feet		Gillig Hybrid BRT	Bus	9/23/15	39,600	1.25	44	71
29	1851	15GGE3117J3093293	MT-47977	2018	2726	28	2	30		Gillig/CNG	Bus	8/1/2018	34500	1.25	38	45
30	1852	15GGE3119J3093294	MT-47978	2018	3039	28	2	30		Gillig/CNG	Bus	8/1/2018	34500	1.25	38	45
31	1853	15GGB3116J3189344	MT-47979	2018	2784	33	2	35		Gillig/CNG	Bus	8/1/2018	41600	1.25	44	71
32	1854	15GGB3118J3189345	MT-47980	2018	2875	33	2	35		Gillig/CNG	Bus	8/1/2018	41600	1.25	i	
33	1855	15GGD3117J3189346	MT-47975	2018	2806	39	2	40		Gillig/CNG	Bus	8/1/2018	41600	1.25	44	71
34	1856	15GGD3119J3189347	MT-47976	2018	2753	39	2	40		Gillig/CNG	Bus	8/1/2018	41600	1.25	49	70