NEW YORK CITY COMPTROLLER
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Metropolitan Transportation Authority's Express Bus Accessibility and User Satisfaction

BUREAU OF AUDIT & INVESTIGATIONS

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Introduction

The Metropolitan Transportation Authority (MTA) provides bus service in New York City, including local buses, Select Bus Service (SBS), limited-stop (LTD) buses, and express buses, which travel between Manhattan and parts of the outer boroughs. There are currently 79 express bus routes serving Queens (30), Staten Island (29), the Bronx (11), and Brooklyn (9). Many express bus routes serve neighborhoods that lack rail service—known as "transit deserts"—increasing the need for reliable service. For most riders, the fare for local, SBS, and LTD buses (i.e., local buses) is $2.90, and the fare for express buses is $7.00. Within the MTA, New York City Transit (NYCT) and MTA Bus Company are responsible for managing, maintaining, and running bus service.

Accessibility of MTA's Bus Fleet

The Americans with Disabilities Act of 1990 (ADA) requires state and local governments to provide people with disabilities equal access to services, programs, and activities, including transportation services. The *MTA Sensitivity & Disability Etiquette Training with ADA* guide states that this includes making bus service wheelchair accessible and "encouraging people with any disability to use the regular fixed-route service."

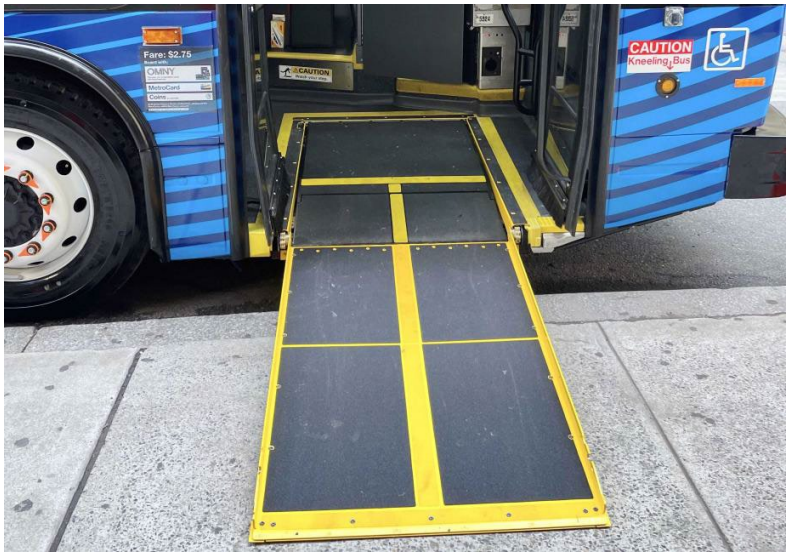
In May 2018, the MTA released *Fast Forward: The Plan to Modernize New York City Transit*, known as the Fast Forward Plan. In this document, the MTA states that, "As a conduit to employment, opportunity, culture and community, transit should give all members of the public a reliable way to travel," and that the MTA was prioritizing accessibility because "for too long people with disabilities have felt that their concerns and needs have not been adequately heard and addressed by our transit system."

Immediate priorities included making "existing facilities work better for those with accessibility challenges." The MTA stated that it would accelerate accessibility by providing training to all staff on working with customers with disabilities, providing enhanced training for bus operators on operating wheelchair lifts, and engaging the accessibility community in critical decisions, including the design of new vehicles, among other things.

According to the MTA, all buses are wheelchair accessible. But in practical terms, accessibility varies greatly by bus type. Local and Select Bus Services vehicles are low-floor buses, which are accessible via front-door ramps that deploy at sidewalk level. To allow wheelchair users to board a local bus, the driver kneels the bus and presses a button to deploy the wheelchair ramp and lower it to the sidewalk, allowing wheelchair users to board the bus themselves (as shown in Figure 1).

Traveling by express bus, however, can be a daunting experience for wheelchair users. Unlike local buses (which are low-floor), the MTA's express bus fleet consists of high-floor, coach-style vehicles commonly used for long-distance or intercity travel (e.g., Greyhound buses). These buses are more difficult to board for wheelchair users, and the boarding process takes much longer, since they must be accessed via an external wheelchair lift located in the middle of the bus, and the driver must leave his or her seat and exit the bus to operate the lift, as shown in Figure 2.

Figure 1: MTA Local Bus with Front-Door Wheelchair Ramp



Source: MTA

Figure 2: MTA Express Bus with External Wheelchair Lift

Source: MTA

Wheelchair users are dependent on the driver's knowledge and experience operating the lift to safely board an express bus—a complex, multi-step process. This requires the driver to move two rows of seats to accommodate the wheelchair user, exit the vehicle, unlock the lift cassette door, deploy the lift and lower it to the sidewalk, board the wheelchair user onto the lift and secure them, raise the lift, open the door to the bus cabin, and secure the customer's wheelchair in place, among other things.

MTA Bus Ridership Data

The MTA publicly reports monthly data on bus ridership and the number of wheelchair ramp and lift deployments. However, ramp and lift deployment data is not separated by local and express bus.

On September 17, 2024, the Comptroller's Office sent a Request for Information to the MTA seeking monthly statistics for express bus wheelchair lift usage, among other things. The audit team calculated wheelchair ramp deployments for local buses by subtracting express bus wheelchair lift deployments from total deployments.

Based on MTA data, riders who use wheelchairs or other mobility devices ride express buses far less frequently than they ride local buses, as detailed in Chart I and Table I below. For Calendar Year 2023, the MTA reported express bus ridership of 15,287,376, and wheelchair lift usage of 3,173. This equates to approximately 208 deployments per 1,000,000 rides.

For this same period, the MTA reported local bus ridership of 411,149,393, and 1,252,450 wheelchair ramp deployments, which equates to approximately 3,046 deployments per 1,000,000 rides.

This means riders who use wheelchairs or other mobility devices represent 0.30% of all rides on local buses, but a tiny 0.02% of express bus rides. People who use wheelchairs are 15 times more likely to ride a local bus than an express bus, an enormous disparity.

This data supports reports received by the auditors that wheelchair users do not use express buses due to unreliable service and safety concerns, discussed below.

Chart I: Local and Express Bus Wheelchair Lift/Ramp Deployments Per One Million Rides

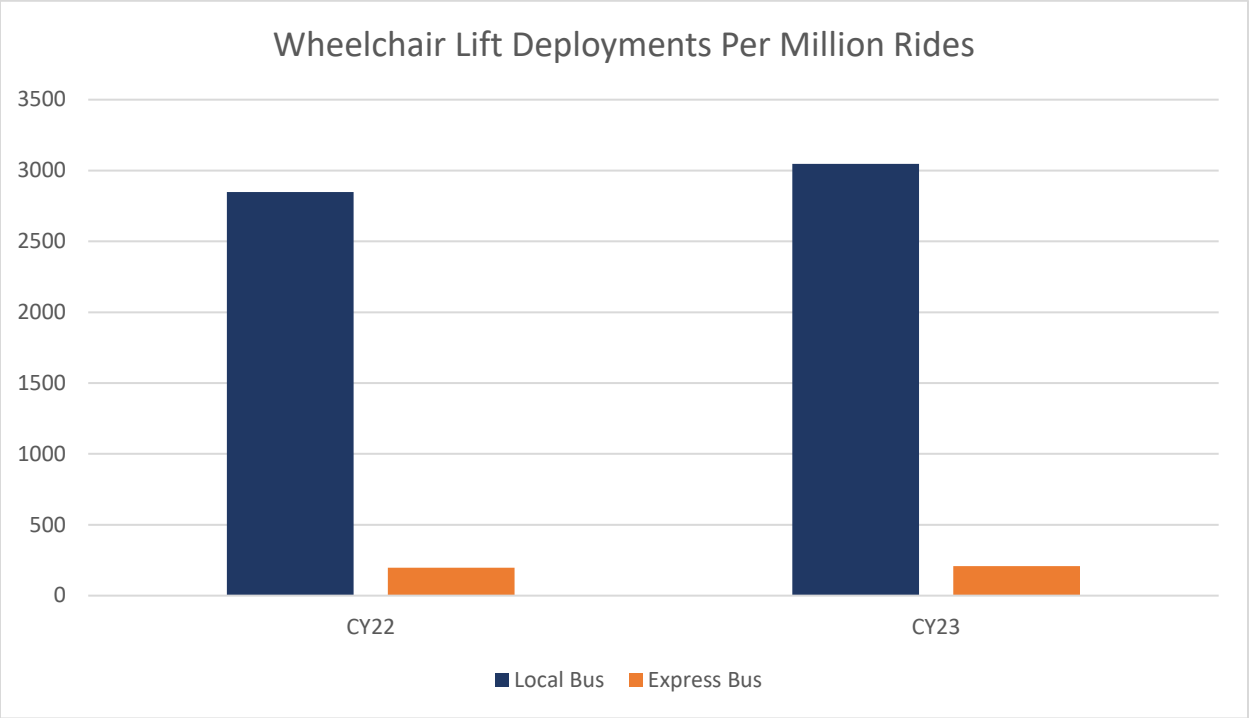


Table I: Local and Express Bus Ridership and Wheelchair Lift/Ramp Deployments

Year	Local Bus			Express Bus		
	Ridership	Wheelchair Lift/Ramp Deployments	Deployments Per Million Rides	Ridership	Wheelchair Lift Deployments	Deployments Per Million Rides
CY22	412,169,650	1,171,008	**2,841**	13,023,660	2,568	**197**
CY23	411,149,393	1,252,450	**3,046**	15,287,376	3,173	**208**

Riders' Concerns

In 2023 and 2024, the New York City Comptroller's Office hosted Disability Justice roundtables to hear directly from disability rights advocates about challenges impacting New York City residents with disabilities. These roundtables are part of the Comptroller's efforts to actively engage with

and advocate for the disabled community. Information gleaned from these roundtables helped inform this report, with participants expressing dissatisfaction with express bus service and highlighting the need for improvements to accessibility.

In August 2024, the Audit Bureau distributed surveys to all express bus riders to assess rider satisfaction with express bus accessibility, performance, and communication.

These two efforts are described in greater detail below.

Disability Justice Roundtables

Participants in the Disability Justice Roundtables said they were unable to regularly board express buses because of inoperable wheelchair lifts or because bus drivers did not know how to operate them, forcing them to wait for the next bus. In addition, participants stated that, on occasion, wheelchair lifts get stuck, which leaves them suspended—more than five feet in the air—while the bus awaits assistance from the Fire Department.

These concerns were detailed in a November 2023 article in *The City,* which investigated the two cases in which this roundtable participant was left suspended above the sidewalk for nearly an hour—once due to faulty hydraulic lifts, and once because the driver did not know how to operate the lift.[1] Firefighters were called to the scene both times and were eventually able to safely remove the woman and her wheelchair from the lift.

Some participants said that they experienced inappropriate, rude, hostile, or threatening behavior, from drivers and/or other passengers, when using or attempting to ride express buses. Participants said that they do not use or are apprehensive about using express buses due to unreliable service and safety concerns—a sentiment supported by the extraordinarily low number of wheelchair lift deployments on express buses, as discussed above.

In addition to these accessibility concerns, disability and express bus rider advocacy groups complained about inadequate, irregular service, including excessive cancelations and poor on-time performance, leading to significant gaps in service and lengthy trip times which cause riders to be late.

Furthermore, riders traveling to parts of Staten Island or Eastern Queens said that they may be stranded if the last scheduled express bus trip is canceled due to a lack of alternative transportation, forcing them to pay for costly taxi or car service. Advocacy groups also reported that the Bus Time (a service providing real-time bus location and information) and MTA app platforms do not always provide sufficient notice of service cancelations (if at all), and that real-time reporting of bus locations is not always accurate or timely.

Rider Satisfaction Surveys

The Audit Bureau staff distributed user satisfaction surveys to riders at express bus stops during the morning and evening rush hours, as well as midday hours. Surveys were also distributed to

[1] Jose Martinez, "Express Bus Lift Problems Leave Wheelchair Users Stuck," *The City*, November 20, 2023, https://www.thecity.nyc/2023/11/20/express-bus-lift-problems-wheelchairs/.

disability advocates and volunteers who participated in express bus observations, which are discussed below.

The Audit Bureau received responses from 458 riders from all five boroughs, most of whom indicated that they ride express buses three or more days per week. Only 11 of the 458 (2.4%) survey respondents indicated that they used or attempted to use a wheelchair lift to board an express bus within the last year.

The survey responses echoed feedback from Disability Justice Roundtable participants, with respondents expressing frustration with the lack of accessibility, lengthy wait times, and generally poor service.

Highlights of the survey are as follows:

- Five of the 11 respondents who reported that they used or attempted to use the wheelchair lift to board an express bus reported that drivers had issues operating lifts on some or most occasions. Another three respondents said that drivers were *never* able to deploy lifts.
- 5 of the 11 respondents who reported that they used or attempted to use the wheelchair lift to board an express bus said that they experienced inappropriate, rude, hostile, or threatening behavior, either from drivers or other passengers, when attempting to board buses.
- More than a third of all respondents (34.5%) said that buses do not operate according to schedule during weekday rush hour. Similarly, 28.4% of respondents said that buses don't operate on schedule outside of rush hour.
- Nearly 70% of respondents said that they were impacted by service cancelations, with 7.6% of those impacted reporting that they were forced to wait more than an hour for the next bus. Based on statistics received from the MTA for January through September 2024, there have been a total of 16,516 trips canceled. Those buses were canceled because no bus operator was present (12,803 trips, 77.5%), there was a road call/mechanical failure (2,949 trips, 17.9%), no buses were available (501 trips, 3%), or other reasons (263 trips, 1.6%).
- Regarding communication, 85.4% of respondents said that they used the Bus Time website in the last year, while 53.7% said they used the MTA app. A significant number of respondents expressed dissatisfaction with both platforms, but more so with the MTA app. Bus Time users reported that they were dissatisfied or very dissatisfied with the accuracy (29.4%) and timeliness (25.6%) of service alerts and accuracy of real-time bus locations (23.8%). While MTA app users reported that they were dissatisfied or very dissatisfied with the accuracy (36.6%) and timeliness (32.5%) of service alerts and accuracy of bus locations (29.7%).

For full survey results, see Appendix 1.

Field Observations

In the months following the Disability Justice roundtables, the Audit Bureau organized field observations of express bus accessibility features to better understand the practical experiences of wheelchair users.

During the planning process, auditors determined that the testing of wheelchair lifts in a closed, stable environment (i.e., an MTA bus depot) would not accurately and reliably test lift functionality and capacity to accommodate different types of wheelchairs and assess drivers' knowledge and experience operating lifts in real-time, field conditions. Auditors determined that conducting field observations with wheelchair users would best capture accurate results and provide insight into driver knowledge and preparation in real conditions.

Auditors teamed up with wheelchair users in August 2024 and attempted to on and off board express buses at stops in all five boroughs during morning and evening rush hours, as well as during midday off-peak hours. This was the first time auditors in this office have partnered with members of the community to conduct field testing. As volunteers attempted to access express buses, auditors observed and recorded the results. In addition to checking wheelchair lift deployment, auditors determined whether drivers properly boarded and secured wheelchair users on lifts, secured wheelchairs once inside the bus and announced stops. Auditors also observed drivers' and other passengers' interactions with wheelchair customers.

Express Bus Accessibility Observations

Wheelchair Users Unable to Board Nearly 25% of Sampled Express Buses

Audit Bureau staff observed express bus drivers deploying or attempting to deploy wheelchair lifts and securing wheelchair users on 25 express buses, covering routes to or from each of the five boroughs. Wheelchair users were unable to board six of the 25 (24%) buses because of issues related to the wheelchair lift (in four instances), or because drivers failed to stop and pick up passengers at bus stops (in two instances). As a result, wheelchair users had to wait for up to one hour before they could successfully board an express bus.

In addition, when wheelchair users were able get on buses, they were often delayed in boarding and not properly secured. These accessibility and safety issues are discussed further below.

Drivers Failed to Pick Up Wheelchair Users

The *MTA Permanent Bulletin on Customer Service* dated March 18, 2021 (the *MTA Customer Service Bulletin*) states that any refusal to board a customer with disabilities is a violation of rules. Furthermore, denying service to customers on the basis of disability violates the ADA. However, one bus driver was observed failing to stop for a wheelchair user waiting at a bus stop designated for express bus pick-up service.

Another bus driver informed a wheelchair user that they could not pull up to the curb and deploy the wheelchair lift because the bus stop was obstructed by illegally parked cars. This contravenes the *MTA Student Bus Operator Instruction Manual,* which states, “If an operator cannot pull the bus into the curb because of an obstruction, they must deploy the lift in the street.” In addition, the *MTA Customer Service Bulletin* states that when a customer using a wheelchair or other mobility device is at a bus stop and the stop is obstructed, the bus driver should “position the bus so that there is sufficient room to maneuver the mobility device onto the lift platform safely.”

Wheelchair Users Unable to Board Due to Lift Issues

On four occasions, wheelchair users were unable to board express buses because of drivers’ lack of knowledge and experience operating wheelchair lifts or mechanical issues. Based on the auditors’ observations, at least one bus driver was unable to board a wheelchair user because he did not perform the lift deployment steps in the proper sequence. Specifically, the driver opened the wheelchair entry door to the bus cabin before deploying the wheelchair lift, as shown in the image below. To deploy the lift, the bus driver must first lower the lift to the ground, board the wheelchair user, and raise the lift before opening the door to the cabin.

Figure 3: Wheelchair Lift Could Not Be Raised because Driver Performed Steps Out of Sequence

In another instance, a bus driver and supervisor could not deploy the wheelchair lift because they did not insert the key in the lift cassette door, attempting instead to insert the key in the baggage bay door.

Figure 4: Wheelchair Lift Could Not Be Deployed because MTA Staff Did Not Know How to Open the Cassette Door

In the two other instances, the auditors could not determine whether the lift failed to deploy due to driver error or mechanical issues.

The *MTA Permanent Bulletin on Wheelchair Lift/Ramp Malfunctions and Customer Delays* dated April 6, 2021, states that if customers who use wheelchairs or other mobility devices are delayed in boarding due to malfunction, bus drivers must immediately inform the Bus Command Center (BCC), and BCC will ensure that appropriate assistance is sent to the location. In addition, the bulletin states that "**every effort** must be made to resolve the issue quickly to avoid further delay to the customer" and bus drivers must inform the customer that help is being sent to the scene. [Emphasis added.] However, on the day of observations, BCC did not send assistance to any of the drivers experiencing difficulties with the lifts and none of the issues were resolved. In all four instances wheelchair users were told that they would have to wait for the next bus, and in three of the four instances the bus was taken out of service and all passengers had to wait for the next bus.

Wheelchair Users Delayed in Nearly 50% of Observed Boardings

Of the 19 instances in which wheelchair users were able to board express buses, nine (47.4%) were delayed. In one instance, it took a driver 20 minutes to board the customer. Again, these delays were due to bus drivers' lack of knowledge and experience operating wheelchair lifts or mechanical issues.

BCC did not send assistance as required, which resulted in further undue delays. Drivers spent considerable effort trying to resolve issues through trial and error or by seeking assistance from other MTA employees. In some cases, drivers were only able to deploy lifts after a passenger or Comptroller's Office staff intervened to provide them with instructions. On two occasions, when bus drivers had difficulties deploying the lift, wheelchair users were suspended in the air for several minutes while drivers troubleshooted issues.

Wheelchair Users Traveling to and from Staten Island Were Most Impacted

Staten Island's lack of transportation options to Manhattan pose singular challenges for wheelchair users. The single-line Staten Island Railway is not integrated into the broader subway system and the only direct connection to Manhattan is by express bus or ferry. This means that Staten Island residents are heavily reliant on express bus service to get to and from Manhattan. The borough is served by 29 express routes—the second-most after Queens.

Staten Islanders who use wheelchairs are uniquely impacted by poor express bus service. As detailed in Table II below, wheelchair users were unable to board five of the 10 (50%) sampled express buses traveling to or from Staten Island.[2] Anecdotally, one wheelchair user reported that they are routinely unable to board express buses traveling from Staten Island to Manhattan and

[2] 10 of the 25 express bus routes observed were to and from Staten Island. As noted, Staten Island along with Queens have the most express bus routes.

must wait for multiple buses before they can successfully board. During the observations, this person was not able to board two express buses and had to wait an hour before they could successfully board a third bus.

Table II: Express Bus Observation Results by Borough

Borough	Total # of Routes	# of Routes Tested	# of Express Buses Tested	# and % of Buses Wheelchair Users Were Able to Board		# and % of Buses Wheelchair Users Were *Not* Able to Board	
				#	%	#	%
Staten Island	29	5	10	5	50%	5	50%
Queens	30	3	6	5	83%	1	17%
Bronx	11	2	3	3	100%	0	0%
Brooklyn	9	4	6	6	100%	0	0%
Total	**79**	**14**	**25**	**19**	**76%**	**6**	**24%**

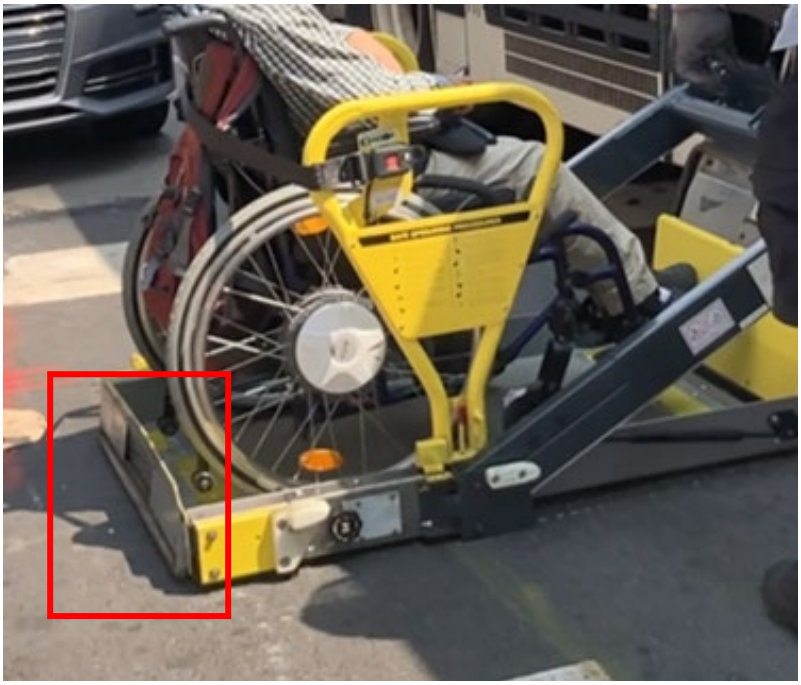
Wheelchair Users Were Not Safely Boarded and Secured

In 16 of the 19 (84.2%) instances in which wheelchair users were able to board express buses, drivers did not correctly position wheelchairs on the lift and/or properly secure wheelchairs once the riders were inside the bus.

Bus Drivers Did Not Recommend that Wheelchair Users Back onto Lift Platforms

The express bus fleet is composed of Motor Coach Industries, Inc. (MCI) and Prevost buses. Both manufacturers' training videos state that wheelchair users should enter the platform with the large wheels facing the bus and small wheels facing the front because the front roll-stop is not designed to keep the larger wheels from rolling off the platform. In addition, the *MTA Customer Service Bulletin* recommends that wheelchair users back onto the lift. However, in 16 of the 19 (84.2%) boardings observed, the express bus drivers did not ensure that wheelchair users backed onto lifts as recommended, as shown in the photo below.

Figure 5: Wheelchair User Incorrectly Positioned on Lift Platform



Although MTA bus manufacturers and the *MTA Customer Service Bulletin* state that wheelchair users should back onto lifts, the MTA express bus training video fails to mention this and, worse, depicts incorrect onboarding procedures. Boarding passengers facing the bus may also make it more difficult for wheelchair users to board express buses, and in particular users of powerchairs—which are longer than standard wheelchairs—may face greater difficulties. During the observations, a powerchair user was boarded facing forward and she had to remove the wheelchair footrests to fit onto the lift platform. If the bus driver had recommended that she back onto the lift, she may not have had to remove her footrests since the front roll-stop is lower than the back roll-stop.

Bus Drivers Did Not Properly Secure Wheelchairs while Bus Was in Motion

The *MTA Student Bus Operator Instruction Manual* states that bus drivers are responsible for securing wheelchairs properly by "affixing the tie down straps to the frame of the wheelchair and tightening them to hold the wheelchair firmly in place." The MTA Customer Service Bulletin states that all four of the tie-down straps must be used to secure the wheelchair. However, during observations, express bus drivers did not properly secure wheelchairs for eight of the 19 (42.1%) boardings primarily because they did not use all four straps. One volunteer said that they were very uncomfortable when the bus made turns or abrupt stops because their wheelchairs were not secured properly.

ADA Violations Regarding Driver Conduct and Announcements

During this review, the auditors noted other serious ADA violations.

For example, drivers did not announce stops in nine of the 19 (47.4%) instances in which wheelchair users were able to board express buses. The MTA Customer Service Bulletin states that the ADA and MTA regulations require bus drivers to make bus stop announcements before arriving to allow passengers enough time to signal that they want to get off the bus. Further, the bulletin states that failure to make announcements is a violation of federal law, a major violation of MTA regulations, and grounds for disciplinary action.

In addition, on two occasions, express bus drivers' conduct may have violated ADA and MTA regulations intended to prevent discrimination. As noted above, one express bus driver failed to stop at a designated pick-up location and board a wheelchair user, and in another instance, when an express bus driver was informed that a wheelchair user wanted to board the bus, the driver laughed and stated, "Are you serious?". The *MTA Sensitivity & Disability Etiquette Training with ADA* states that when people with disabilities ask for an accommodation, such as deploying a wheelchair lift, the driver should respond with courtesy and respect.

MTA's Training and Oversight Is Inadequate

In September 2024, the auditors requested that the MTA provide detailed information regarding the status and implementation of Fast Forward Plan accessibility initiatives, including training on working with customers with disabilities and enhanced training for bus drivers on operating wheelchair lifts. In response, the MTA stated that the agency provided further instructions to bus drivers and increased the frequency of wheelchair lift trainings. The MTA stated that the additional training was particularly helpful for express bus drivers since "the number of customers using the lift is lower compared to other bus routes and the technologies are more complex and deployed less frequently." In addition, the MTA provided the auditors with training materials and guidance provided to bus drivers.

The MTA also reported that it increased the frequency of testing accessibility features, streamlined the process for reporting issues with wheelchair lifts, and conducted undercover ADA compliance checks in response to riders' concerns.

However, based on the results of the auditors' observations and bus drivers' anecdotal comments, it appears that either bus drivers did not receive annual training, or that training and other measures were ineffective. During the observations, several express bus drivers stated that they were trained only once on wheelchair lift operation, or that this was their first time operating the lift. One driver stated that they were trained once when they started driving express buses around 10 years ago.

MTA's Has Failed to Meet its Obligations for Express Bus Accessibility

MTA Did Not Sufficiently Identify and Test New Bus Designs or Engage the Accessibility Community in Decision Making

The Fast Forward Plan outlines the MTA's immediate priorities, which include reimagining the bus network to improve customer experience and increase capacity, and "accelerating accessibility" by engaging the accessibility community in critical decisions, including the design of new vehicles. To address those priorities, the MTA stated that it evaluated new bus designs and tested the use of double-decker buses and ramp-equipped express buses.

However, since 2018, the MTA has piloted only one potentially viable ramp-equipped express bus design. This design received positive feedback from wheelchair users and the general ridership. However, the MTA did not expand the pilot or implement the new design, citing negative feedback on some bus features, increased costs, and structural qualifications. Furthermore, the MTA did not meaningfully engage people with disabilities in the selection and evaluation of new bus designs.

These and other issues are explained in detail below.

MTA Tested Only One New Viable Express Bus Since 2018, but Did Not to Move Forward With It (for Reasons that are not Clear) Even Though It was Preferred by All Wheelchair Users

In 2018, the MTA piloted two alternative bus designs: the Alexander Dennis Enviro500 SuperLo Double-Decker bus and the MCI D45 Commuter Rapid Transit (CRT) Low Entry (LE) bus. However, only one of these designs (the MCI D45) was a potentially viable alternative to models in the MTA's current express bus fleet, while the other (the Alexander Dennis) was fundamentally unsuitable for New York City's roadways and should never have been piloted in the first place.

Alexander Dennis Enviro500 SuperLo Double-Decker Bus

From April 23 to May 27, 2018, the MTA piloted one Alexander Dennis Enviro500 SuperLo Double Decker demonstration bus in revenue service to evaluate the feasibility of using double-decker buses for express routes. However, the MTA should have known that the Alexander Dennis

double-decker bus was not suitable for service in New York City due to its height. Nevertheless, the MTA piloted this bus for one month and engaged NYCT Market Research to survey general ridership and conduct a focus group with customers who use wheelchairs.

In December 2018, the MTA issued an In-Service Evaluation Report for the Alexander Dennis double-decker pilot, which stated that, "[d]ue to the height of the double-decker bus, there are limits to the roadways on which it can be driven, particularly tunnels." The height of the double-decker bus precluded it from traveling through the Hugh Carey Tunnel, Queens-Midtown Tunnel, Holland Tunnel, and the upper level of the Ed Koch Queensboro Bridge. Therefore, the bus could not be used for any express bus routes serving Brooklyn and could only be used for a limited number of routes serving Staten Island and Queens. It is unclear whether the bus could have been used for routes serving the Bronx because the MTA did not determine whether those routes pass under low bridges or other structures.

In addition, the Alexander Dennis double-decker bus was not viable because it generally did not fit in bus depots. The In-Service Evaluation Report stated that only one express bus depot could accommodate the height of a double-decker bus.

MCI D45 CRT LE Bus

From June 26 to September 14, 2018, the MTA piloted one MCI D45 CRT LE demonstration bus in revenue service to evaluate accessibility features, including mid-door low entry with wheelchair ramp and automatic wheelchair restraint system. This bus consisted of two levels: a lower-level vestibule with three seats and space for two wheelchair users, and an upper level with seats similar to existing express buses.

The MCI bus loan agreement stated that this bus would generally be evaluated on its suitability for operation in revenue service and stated that evaluation criteria would include reliability, durability, safety, fuel economy, noise, and passenger and driver feedback. In December 2018, the MTA issued an In-Service Evaluation Report for the MCI bus, which stated that it generally had the same fuel economy as other MCI model buses in the MTA's fleet. In addition, the report stated that general ridership preference was nearly evenly divided between the MCI D45 CRT LE bus and the existing bus fleet.

There was positive feedback for many features, though riders were dissatisfied with legroom and (to a lesser extent) seat comfort. All wheelchair users preferred the MCI D45 CRT LE bus' wheelchair ramp to the lifts in the existing fleet. The In-Service Evaluation Report noted that wheelchair lifts in current express buses were a major concern, with customers saying that lifts were precarious in operation and time-consuming. The report also stated that wheelchair customers "mostly liked the vestibule" offered by the MCI bus.

However, in a letter dated November 29, 2024, the MTA stated that it generally looks for "overwhelmingly positive feedback before moving the fleet in a new direction," and determined that the MCI D45 CRT LE was not an improvement over its existing fleet due to the negative feedback regarding leg room, seat comfort, and accessible seating area, and increased costs. The MTA stated that "during a bus procurement that occurred following the demonstrations, the MCI [D45] CRT LE was offered as an alternative, with purchase costs approximately 20% more than the standard express bus" and "found to be not structurally qualified for consideration." In

support of this, the MTA provided only limited procurement documentation and did not provide any documentation regarding structural qualifications.

Other Consultations

Since 2018, the MTA has not piloted any other alternative bus designs. The MTA stated that it consulted with additional manufacturers but the "limited pool of bus manufacturers presents a key challenge for achieving wider accessibility on the Express Bus network." The MTA reported that NYCT attempted to test and evaluate other alternative buses in 2023 but was unable to pilot them.

The MTA stated that NYCT worked with its procurement division and two different vendors (ABC Companies and ENC) to test and evaluate buses, but one vendor would not agree to the MTA's terms and conditions, and the other vendor shut down its bus business due to changes in market conditions.

While the MTA Surveyed More than 1,000 General Ridership Customers, It Surveyed Only 10 Wheelchair Users

The MTA's stated priorities included "accelerating accessibility" by "[engaging] the accessibility community in critical decisions including the design of new vehicles." While the MTA solicited feedback from hundreds of general ridership customers via in-person and online surveys over the duration of each pilot, it conducted only a single focus group with a handful of wheelchair customers. The MTA's own research team deemed wheelchair customers' feedback inadequate to project to the population.

For the Alexander Dennis double-decker bus pilot, the MTA received and considered feedback from 377 general ridership customers. During the one-month evaluation period, NYCT Market Research interviewed 244 general ridership customers in-person, and an additional 133 customers responded to an online survey. However, NYCT Market Research conducted a focus group with only six wheelchair customers and one member of the NYC Transit Riders Council, who boarded and toured a demonstration bus.

The In-Service Evaluation Report stated that there was one group conversation that lasted approximately 90 minutes regarding participants' current transit system use, existing bus fleet, and a tour and discussion of the demonstration bus. The report stated that the findings "should not be considered as projectable to a population at large" and represent only "issues for consideration." In addition, the demonstration bus was fitted to another transit operator's specifications and may not have all the features that would be selected by the MTA.

Similarly, for the MCI bus pilot, the MTA received and considered feedback from 645 general ridership customers. During the 90-day evaluation period, NYCT Market Research interviewed 184 general ridership customers in-person, and an additional 461 customers responded to an online survey. However, NYCT Market Research conducted a focus group with only four wheelchair customers and one member of the NYC Mayor's Office for People with Disabilities, who boarded and toured a demonstration bus.

Conclusion

The findings of this report affirm the concerns and dissatisfaction with service that people with disabilities and express bus riders expressed during roundtables and other meetings and in response to our survey. These objectively demonstrate that the MTA has fallen short on its stated priorities and commitments to engage the accessibility community and improve accessibility and performance.

The MTA states that all buses are accessible for riders who use a wheelchair. However, the extent to which wheelchair users were unable to board sampled express buses or encountered difficulties and delays in boarding them, and the MTA's failure to implement alternative bus designs to make express buses more accessible, highlights the urgent need for improvements.

As previously noted, many express buses serve transportation deserts and are the only direct access between the outer boroughs and Manhattan. Therefore, it is imperative that the MTA make good on its commitments to people with disabilities and general ridership. To that end, we offer the recommendations below.

Recommendations

To address the abovementioned findings, the auditors recommend that the MTA should:

1. Immediately conduct refresher trainings on wheelchair lift operation, as well as ADA and MTA requirements for providing service to people with disabilities. This includes immediately informing BCC of lift issues, safely boarding customers, securing wheelchairs, making bus stop announcements as required, and appropriate etiquette.
2. Ensure that all express bus drivers receive annual hands-on training in operating wheelchair lifts and provide express bus drivers with field instructions for operating wheelchair lifts.
3. Separately report express bus wheelchair lift deployments, including the number of failed deployments and successful deployments.
4. Pilot additional low-floor entry buses or other accessible bus designs and consider implementing those buses as vehicles are retired.
5. Make meaningful efforts to engage the accessibility community on new bus designs, including designs that provide ramp entry. Those efforts should include, but not be limited to, selecting buses to pilot, accessibility features and bus design, and revenue service pilots. When piloting new bus designs, ensure that demonstration buses are equipped with accessibility features that the MTA proposes to implement and that a sufficient number of people with disabilities are engaged so that their feedback is projectable to the population.
6. Compare express bus scheduled pick up and drop off times to actual times and revise bus schedules as necessary to ensure they are realistic and as accurate as possible.
7. Address bus driver shortages and mechanical failures to minimize the impact of service cancelations. If shortages cannot be addressed, revise service schedules to minimize service cancelations.
8. Improve MTA communication applications to ensure that they provide customers with accurate and timely information on service alerts, bus locations, and estimated bus arrival times.

Appendix 1

Express Bus User Survey Results

Accessibility[3]			
Question	**Yes**	**No**	**No Response**
Have you used or attempted to use the wheelchair lift in the past 12 months?	2.4%	97.6%	
Have you experienced inappropriate, rude, hostile, or threatening behavior, either from drivers or other passengers, when using or attempting to use the express bus?	45.5%	36.4%	18.2%
Has your experience with inappropriate, rude, hostile, or threatening behavior impacted whether or how often you use express bus service?	27.3%	18.2%	54.6%

Accessibility					
Question	**On most occasions, the driver is able to deploy the lift and I am able to board the bus**	**On most occasions, the driver is unable to deploy the lift and I am not able to board the bus**	**Sometimes the driver is unable to deploy the lift and I am not able to board the bus**	**The driver is always able to deploy the lift and I am able to board the bus**	**The driver is never able to deploy the lift and therefore, I am unable to use express bus service**
Select the option which best describes your experience boarding or attempting to board the express bus using the lift.	10.0%	30.0%	20.0%	20.0%	20.0%

[3] In August 2024, the Audit Bureau distributed surveys to express bus riders to assess their satisfaction with express bus accessibility, performance, and communication. Of the 458 survey respondents, 11 (2.4%) indicated that they used or attempted to use a wheelchair lift to board an express bus within the last year. The percentages for all other survey questions regarding accessibility pertain to those 11 respondents.

Performance[4]						
Question	**More than five days per week**	**Three to five days per week**	**One or two days per week**	**One to three days per month**	**Less than once per month**	**Never**
How often do you take the express bus?	17.7%	63.8%	9.6%	4.4%	4.4%	0.2%
Question	**Strongly agree**	**Agree**	**Neutral - neither agree nor disagree**	**Disagree**	**Strongly disagree**	**I do not ride the express bus during weekday rush hours**
During the weekday rush hours, the express bus generally runs in accordance with the schedule?	10.3%	33.3%	17.3%	190%	16.8%	3.3%
Outside of weekday rush hours, the express bus generally operates in accordance with the schedule?	5.2%	22.8%	19.2%	16.80%	13.3%	22.8%
Question	**Less than one hour (1:00)**	**1:00 – 1:15**	**1:16 – 1:30**	**1:31 - 1:45**	**1:46 – 2:00**	**More than 2:00**
On average, how long is your express bus ride going to midtown/downtown Manhattan?	33.3%	37.4%	18.4%	6.5%	3.0%	1.4%
On average, how long is your express bus ride leaving midtown/downtown Manhattan?	13.3%	29.5%	26.3%	17.3%	7.6%	6.0%

[4] The percentages for survey questions regarding performance pertain to all 458 respondents.

Performance			
Service Cancelations			
Question	**No**	**Yes**	
Have you been impacted by service cancelations?	31.2%	68.8%	
Question	**1-5 Times**	**6-10 Times**	**More Than 10 Times**
Within the last month, how often has your scheduled express bus been canceled?	80.6%	10.5%	8.9%

Service Cancelations						
Question	**Less than 15 minutes**	**16 - 30 minutes**	**31 - 45 minutes**	**45 - 60 minutes**	**More than one hour**	**Another bus did not arrive because it was the last scheduled trip for the day**
When your scheduled express bus was canceled, on average how long did you wait for the next bus to arrive?	3.5%	45.4%	24.4%	16.3%	8.1%	2.3%

MTA BUS TIME[5]					
Question	**Less than once per month**	**More than five days per week**	**One or two days per week**	**One to three days per month**	**Three to five days per week**
How often do you use MTA Bus Time?	3.2%	36.6%	9.5%	6.9%	43.9%
Question	**Very Satisfied**	**Satisfied**	**Neutral - neither satisfied nor dissatisfied**	**Dissatisfied**	**Very Dissatisfied**
How satisfied are you with the timeliness of MTA Bus Time reporting of service alerts?	12.3%	31.0%	31.2%	17.4%	8.2%
How satisfied are you with the accuracy of MTA Bus Time reporting of service alerts?	8.8%	33.4%	27.4%	22.4%	7.9%
How satisfied are you with the accuracy of MTA Bus Time reporting of "Real-Time" bus locations?	10.4%	37.9%	26.5%	18.9%	6.3%
How satisfied are you with the accuracy and reliability of MTA Bus Time reporting of "Real-Time" estimated arrival times for next stops?	9.8%	40.7%	23.3%	19.9%	6.3%
How satisfied are you with the accuracy of MTA Bus Time reporting of "Estimated" bus locations?	9.2%	35.0%	33.1%	16.1%	6.6%
How satisfied are you with the accuracy and reliability of MTA Bus Time reporting of "Estimated" estimated arrival times for next stops?	10.4%	36.6%	31.6%	14.5%	6.9%

[5] Of the 458 survey respondents, 391 (85.4%) said that they used the Bus Time website in the last year. The percentages for all survey questions regarding Bus Time pertain to those 391 respondents.

MTA BUS TIME[5]					
Question	**One or two days per week**	**Three to five days per week**	**More than five days per week**	**One to three days per month**	**Less than once per month**
How often do you use the MTA app?	11.8%	39.8%	32.5%	11.0%	4.9%
Question	**Very satisfied**	**Satisfied**	**Neutral - neither satisfied nor dissatisfied**	**Dissatisfied**	**Very dissatisfied**
How satisfied are you with the timeliness of the MTA app reporting of service alerts, cancellations, and boarding changes?	5.0%	30.0%	31.5%	25.0%	8.5%
How satisfied are you with the accuracy of the MTA app reporting of service alerts, cancellations, and boarding changes?	4.5%	32.5%	25.5%	27.5%	10.0%
How satisfied are you with the accuracy of the MTA app reporting of real time bus locations?	7.5%	33.0%	29.0%	21.5%	9.0%

[6] Of the 458 survey respondents, 246 (53.7%) said that they used the MTA app in the last year. The percentages for all survey questions regarding the MTA app pertain to those 246 respondents.

MTA Communications[7]					
Question	**Very Satisfied**	**Satisfied**	**Neutral - neither satisfied nor dissatisfied**	**Dissatisfied**	**Very Dissatisfied**
How satisfied are you with the accuracy and timeliness of reporting of route changes while riding on the express bus?	6.6%	25.1%	41.5%	18.9%	7.9%
How satisfied are you with the language access of MTA communications?	13.1%	31.4%	43.7%	7.7%	4.1%

[7] The percentages for survey questions regarding MTA Communications pertain to all 458 respondents

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