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September 25, 2020

Docket Management Facility,  
U.S. Department of Transportation,  
1200 New Jersey Avenue SE,  
West Building Ground Floor, Room W12-140,  
Washington, DC 20590-0001.

Subject: Pathways to the Future of Transportation  
Docket No. DOT-OST-2020-0112

To Whom it May Concern:

We question the guiding principle of Technology Neutrality. While this may be a generally good principle, it runs the risk that the best transportation solutions may be counter-intuitive or extremely difficult for the private sector to develop. Personal rapid transit (PRT) is an example where city-wide systems are the most cost-efficient but very difficult to get started from scratch. The industry can survive on small, niche deployments but these hide the true potential of the technology. If the NETT Council would start by facilitating one or more credible city-wide PRT feasibility studies, the industry would step up and make large deployments happen.

The role of the government should not be to be technology neutral, it should be to investigate new concepts and help those with promise become viable. A classic example is all the attention being paid to Hyperloop and the lack of attention to PRT. A simple analysis shows that both are likely viable alternatives yet the one getting the attention is focused on inter-city travel which currently has few problems while the one being ignored has the potential to help solve congestion and mitigate transportation-related greenhouse gas emissions. The Federal Government turned its back on PRT in the mid-1970s. Now it is re-emerging around the world, but the U.S. is taking a back seat.

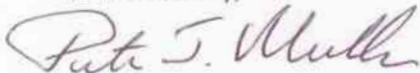
Regulation should wait until the new technology is taking shape. Railways came before FRA. Airplanes came before FAA. PRT will come before Federal PRT Administration. Existing agencies can handle incremental technology advances, such as electric cars, hydrogen cars, and autonomous cars. But existing agencies are better not involved in the regulation of a fundamentally new technology. The old methodologies do not apply. The experts have to unlearn first.

There should be a federal advanced transportation planning organization. It should think ahead in planning a new technology and coordinating it with existing technologies. For example, there will be

hundreds of thousands of miles of PRT. There will be both positive and negative impacts on existing transportation systems and the urban environment that need to be planned for in advance. Cities and transportation agencies need to know what viable options are available and how to plan for them. To leave this up to the private sector places our future in the hands of the rich and famous rather than the best.

The DOT is not technologically neutral as evidenced by its frequent references to corridors. Technologies that function better in networks than corridors (again like PRT) are already discriminated against. In our opinion, the proposed \$2 million in funds for the NETT Council is ludicrous in light of the fact that we spend \$34 billion annually on transit buses and trains.

Yours sincerely,

A handwritten signature in cursive script that reads "Peter J. Muller".

Peter J. Muller, P.E.  
President