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To: [SB125 Transit@CALSTA](mailto:SB125Transit@CALSTA)
Subject: MEETING #12 Item 4 Public Comment
Date: Tuesday, August 26, 2025 8:00:59 AM

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Dear Members of The Transit Transformation Task Force,

I appreciate the opportunity to submit a public comment on Service and fare coordination or integration between transit agencies (1.f.1.A). I am alarmed by the recent trend towards the adoption of non-interoperable fare systems. In the Southern California region, there are several examples of the need for greater coordination at the local, regional, and state levels.

The LA Metro 2023 fare change appears to have led to the unintended elimination of transfers to agencies outside of Los Angeles County. Switching from a pass-based fare system to a cap-based fare system eliminated the paper passes that other agencies used to validate transfers. Previously, LA Metro's J line and Foothill Transit's Silver Streak both accepted passes from either agency through the Silver-2-Silver program. Page 7 of the OC BusBook describes how to transfer to OCTA using Metro passes that no longer exist. These transfers have been eliminated, apparently by accident, since these agencies do not have an interoperable fare system capable of validating a LA Metro fare cap.

The elimination of the transfer between Foothill Transit and LA Metro directly impacts the service quality experienced by riders. The previous pass-based fare system allowed riders to purchase a day pass and then ride the next bus from either operator. The current fares as published imply that no transfer exists between these agencies. Foothill Transit's website, which still refers to the outdated Metro passes, does not inform riders if the LA Metro daily and weekly fare caps would be applied towards a Silver Streak boarding. Similarly, LA Metro's fare page is silent on if a Foothill Transit day pass will cover the J Line fare. With this lack of clarity, fare-conscious riders only ride with one agency, which effectively means a reduced frequency of service on the shared segment.

I support the recommendation for a greater level of regional and statewide coordination between agencies. If only the LA Metro Board of Directors and the Foothill Transit Board of Directors would update the Silver-2-Silver program with the new fare system, the transfer would be restored. Getting local agencies to resolve these interagency problems requires a regional level of coordination.

I am highly concerned about the trend towards non-interoperability with other agencies in this generation of new fare systems.

A lack of interoperability seems to be a fundamental tradeoff with smart card and

smartphone based fare systems. In Orange County, the existing OCTA paper pass-based fare system requires no special equipment for other agencies to validate the fare; other agencies can visually inspect the date printed on the pass by the OC bus farebox. However, smart cards require the installation of specialized fare equipment. As more agencies adopt a smart fare system, transferring agencies would require an additional fare reader for each non-interoperable fare system, which is impractical.

OCTA has announced the launch of the Wave fare system, which will not be compatible with LA Metro's TAP fare system. OCTA buses will be unable to accept TAP stored value and passes and LA Metro buses will not honor OCTA Wave cards. This lack of interoperability poses a technical barrier to offering transfers between agencies. In addition, agencies along the LA-OC county line might be forced to choose one incompatible system or the other. The cost of installing multiple card readers is especially significant for smaller operators so some existing transfers may be eliminated as a side effect of the new fare system.

I would strongly urge the State to require all state-funded transit agencies to have interoperable fare systems. Many vendors offer proprietary systems that do not interoperate with other systems. As more agencies have adopted smart payment systems, the statewide transit network has become a patchwork of non-interoperable systems. I urge the State to establish a common technical standard to mandate interoperability between fare systems.

I would support coordinating fare payment systems on a regional level because fare system interoperability is a prerequisite for fare coordination. The Bay Area's Clipper and Los Angeles County's TAP show the potential of single interoperable regional fare systems to enable fare coordination. A shared single interoperable form of fare payment for all operators in the entire region eliminates technical barriers to interagency transfers.

NCTD and Amtrak Pacific Surfliner provide an example of how interoperability is critical to enabling interagency transfers. When I rode the Pacific Surfliner last year, a conductor informed me that Amtrak would soon be checking receipts to validate an NCTD Coaster Day Pass loaded on a PRONTO smart card. Amtrak has a legitimate need to validate tickets but has no ability to read a PRONTO smart card. However, shifting the burden onto the rider creates an unfair situation. Nothing on the Pacific Surfliner or NCTD website indicates that the receipt is needed to validate the NCTD Coaster Day Pass on Pacific Surfliner. Furthermore, the NCTD Coaster Day Pass can be purchased online, leaving the rider without any receipt. Clearly, NCTD should provide Amtrak with PRONTO card readers to ensure that its riders are accepted per their Rail2Rail agreement.

The State should obligate all state-funded transit agencies to provide technical assistance to each other when necessary to enable interagency transfers. Evidently, NCTD's Rail2Rail Agreement with Amtrak does not include a clause requiring NCTD to provide Amtrak with

technical assistance to interoperate with NCTD's fare system.

Thank you for your consideration,
Grady Yu

References:

<https://www.octa.net/ebusbook/CompleteBusbook.pdf>

Effective August 10, 2025

"Metro day passes cannot be used on OC Bus, only monthly passes will be accepted"

"OC Bus will honor Metro monthly bus passes, MTA TAP and MTA TAP cards with EZ sticker at all bus stops along the line on the seven OC Bus routes that serve Los Angeles County"

<https://www.foothilltransit.org/silver-streak-j-line-metro-silver>

"If you ride Foothill Transit's Silver Streak or Metro's J Line (Silver) between El Monte Station and downtown LA, you have options! Silver Streak to J Line (Silver) lets you ride whichever line you want — Foothill Transit Silver Streak or Metro J Line (Silver) — if you pay with a Foothill Transit Pass or a Metro pass. "

<https://www.metro.net/riding/fares/>

<https://gonctd.com/services/coaster-commuter-rail/r2r-ride-amtrak/>

"Check the schedule board on any Pacific Surfliner train and show the Amtrak conductor any valid COASTER Regional Day or COASTER Monthly Pass."