



Commonwealth of the Northern Marianas Islands  
Commonwealth Office of Transit Authority  
Office of the Governor



"Driving You Forward"

## ACKNOWLEDGEMENT

I hereby acknowledge that I approve the Commonwealth Office of Transit Authority's (COTA) Title VI Plan Update on the 12<sup>th</sup> day of September 2023.

For 

Alfreda Camacho Maratita  
Special Assistant for Public Transportation

09/12/2023

Date



COTA Administrative Building and Maintenance Facility. 12841 Lower Base Dr. Saipan  
Caller Box 10007 • Saipan MP 96950 • (670) 664-2682 • [alfredac.maratita@gov.mp](mailto:alfredac.maratita@gov.mp)  
[www.facebook.com/COTASaipan](https://www.facebook.com/COTASaipan)

**Arnold I. Palacios**  
Governor



**David M. Apatang**  
Lieutenant Governor

**COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**  
**OFFICE OF THE GOVERNOR**

**MEMORANDUM**

**GOV2023-857**

**DATE:** August 09, 2023  
**TO:** All Department and Agency Heads  
**FROM:** Governor  
**SUBJECT:** Delegation of Authority

The Special Assistant for Public Transportation, Ms. Alfreda Camacho Maratita will be on personal leave beginning August 10, 2023 to August 26, 2023 followed by Official Business from August 27, 2023 to August 30, 2023 and from August 31, 2023 to September 12, 2023 will be on personal leave.

Until her return Mr. Ernie Bell, Operations and Maintenance Coordinator, is designated Acting Special Assistant for Public Transportation.

Please extend your full cooperation and assistance to Mr. Ernie Bell as he assumes this additional responsibility.

Sincerely,

A handwritten signature in blue ink, appearing to read "Arnold I. Palacios".

**ARNOLD I. PALACIOS**



Commonwealth of the Northern Marianas Islands  
Commonwealth Office of Transit Authority  
Office of the Governor



"Driving You Forward"

**Title VI Plan Update**

Date Updated: September 12, 2023

Date Update Approved: September 12, 2023

**I. Plan Statement**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance” (42 U.S.C. Section 2000d).

Commonwealth Office of Transit Authority (COTA) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by the Title VI in Federal Transit Administration (FTA) Circular 4702.1B.

This plan was developed to guide the COTA in its administration and management of Title VI-related activities.

**Contact Information:**

**Alfreda Camacho Maratita**  
**Special Assistant for Public Transportation**  
**Commonwealth Office of Transit Authority**  
**Office of the Governor**  
**Administrative Building & Maintenance Facility**  
**12841 Lower Base Dr., Saipan**  
**Commonwealth of the Northern Mariana Islands**  
**Caller Box 10007**  
**Saipan, MP 96950**  
**Tel: (670) 664-2682**  
**Email address: [alfredac.maratita@gov.mp](mailto:alfredac.maratita@gov.mp)**  
**COTA Website: [www.ctacnmi.com](http://www.ctacnmi.com)**

## **II. Title VI Information Dissemination**

Title VI information posters shall be prominently and publicly displayed in the COTA facility and on their revenue vehicles. The name of the Title VI Coordinator is available on the COTA's website, at [www.ctacnmi.com](http://www.ctacnmi.com). Additional information relating to nondiscrimination obligation can be obtained from the Special Assistant for Public Transportation.

Title VI information shall be disseminated to COTA employees annually via the Employees Education form (**Appendix A**) in payroll envelopes. This form reminds employees of the COTA's policy statement, and of their Title VI responsibilities in their daily work and duties.

During New Employees Orientation, new employees shall be informed of the provisions of Title VI, and the COTA's expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (**Appendix B**).

## **III. Subcontractors and Vendors**

All subcontractors and vendors who receive payments from COTA where funding originates from any Federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contract shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

## **IV. Record Keeping**

The Special Assistant for Public Transportation will maintain permanent record, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the COTA Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

## **V. Title VI Complaint Procedures**

**How to file a Title VI Complaint? (Complaint Form-Appendix C)**

The complainant may file a signed, written complaint to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information for any witnesses.
- Other information that you deem significant

The Title VI Complaint Form may be used to submit the complaint information. The complaint may be filed in writing with COTA at the following address:

Commonwealth Office of Transit Authority  
Office of the Governor  
COTA Administrative Building & Maintenance Facility  
12841 Lower Base Dr., Saipan  
Caller Box 10007  
Saipan, MP 96950

NOTE: COTA encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Special Assistant for Public Transportation as soon as possible, but no later than 180 calendar days from the alleged date of discrimination.

#### **What happens to the complaint after it is submitted?**

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by COTA will be directly addressed by COTA. COTA shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, COTA shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledging receipt of complaint will be mailed within seven days (**Appendix D**). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

#### **How will the complainant be notified of the outcome of the complaint?**

COTA will send a final written response letter (see **Appendix E or F**) to the complainant. In the letter notifying complainant that the complaint is not substantiated (**Appendix F**), the complainant is also advised of his or right to 1) appeal within seven calendar days of receipt of the final written decision from COTA, and/or 2) file complaint externally with the U.S. Department of

Transportation and/or the FTA. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

**Federal Transit Administration Office of Civil Rights  
Attention: Title VI Coordinator  
East Building, 5<sup>th</sup> Floor-TCR  
1200 New Jersey Ave., SE Washington, DC 20590**

#### **VI. Limited English Proficiency (LEP) Plan**

Upon request you may be provided a copy of the COTA approved LEP Plan.

#### **VII. Community Outreach (Public Participation Plan)**

Community Outreach is a requirement of the Title VI. Recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have a wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of the recipient. As an agency receiving federal financial assistance, we have made the following community outreach efforts:

1. NMPASI's Early Hearing Detection and Intervention 2020 Meet and Greet Outreach on December 14, 2020.
2. Center of Living Independently (CLI) Mini Workshop on February 26, 2021.
3. NMPASI MCHB Hard of Hearing Workshop (Tinian) on March 13, 2021.
4. Center of Living Independently (CLI) Mini Workshop (Rota) on April 30, 2021.
5. NMPASI MCHB Hard of Hearing Workshop (Rota) on May 01, 2021.
6. DCCA-Division of Youth Services Family Fun Day 2021 on May 08, 2021.
7. 2021 DCCA-Division of Youth Services Parent Leadership workshop on May 14, 2021.
8. Office Vocational Rehabilitation Full Blown Outreach on August 5, 2021.
9. Division of Youth Affairs Family Fun Day on August 13, 2021.

10. Cooperative Education Program Spring 2022 Semester Job Fair on February 3, 2022.
11. Joeten-Kiyu Public Library's Third Annual Community Mobile Information Literacy Fair on April 2, 2022.
12. 2022 DCCA-Division of Youth Services Family Fun Day – Raise Awareness Against Child Abuse and Child Neglect on July 2, 2022.
13. NMI Judiciary 2022 Pretrial, Probation, and Parole Supervision Week – Probation and Parole Awareness Month Professional Development on July 22, 2022.
14. CNMI PSS Cooperative Education Fall Semester Job Fair on September 15, 2022.
15. National Disability Employment Awareness Month on October 6, 2022 and October 8, 2022.
16. International Day of People with Disabilities on December 03, 2022.
17. Marianas Visitor's Authority (MVA) Korea Road Show on August 29-30, 2023.

### **The process**

The COTA uses a variety of methods to inform, increase awareness, and engage the public during the development of plans and programs. The medium used and the degree to which the public is encouraged to be involved varies depending on the planning activity. The COTA uses the following methods and techniques:

- **News Media:** COTA staff distributes meeting agendas and public notices associated with transit plans and programs, and public announcements for special studies using press releases to our media contact list.
- **Contact Lists:** COTA staff maintains an extensive list of public participation contacts that includes representatives of:
  - Commonwealth Public Transportation Advisory Board
  - Military and Veterans Affairs Office
  - Northern Marianas College
  - Council on Developmental Disabilities
  - Office on Aging

- Non-Profit Organizations (i.e., Northern Marianas Protection and Advocacy Systems, Inc., Center for Living Independently in the Commonwealth of the Northern Mariana Islands)
- News Media
- Social Services Agencies
- Office of Vocational Rehabilitation
- Public School System
- Department of Public Works
- Commonwealth Ports Authority
- Community Organization (i.e., American Red Cross, Rotary Club, Saipan Chamber of Commerce)
- Other interested Parties

- **Public meetings, Workshops, & Open Houses:** These activities provide opportunities for public input throughout the planning process. The results and comments obtained at these meetings are incorporated into the appropriate planning documents. The COTA strives to provide widespread access to these forums by conducting them at accessible times and locations. In addition, presentations at partner agencies meetings are scheduled to inform and engage. Supplemental materials such as questionnaires, surveys, and handouts of presentation materials may be distributed to interested parties, and posted on the website to accommodate those unable to participate in person.
- **Public Information Presentations:** COTA staff will, upon request, present before any civic organization, school, special interest group, neighborhood, or other group to inform, increase awareness about COTA's planning functions, plans, programs, or special studies.
- **Surveys:** Surveys, which may be project-specific, are used during the updates of plans for data gathering. The survey process and the survey results are incorporated into their respective planning documents.
- **Information Booths/Kiosks:** The COTA periodically sets up and maintains information booths or kiosks at locations and special events.
- **Visualization Techniques:** COTA staff relies on maps, graphics, and PowerPoint presentations to describe and discuss transportation plans and programs. Products include maps, charts, graphs, and pictures, which are used extensively within the documents and supplement materials to existing and future conditions of transportation systems and to illustrate recommendations.
- **Radio/TV:** This media is periodically used to provide increased focus for broad reach to the general public for special projects. The COTA also uses this media when reaching out to

specific populations, such as members of a community where an upcoming public meeting will be taking place, or members of a community where English is not the primary language in use.

- **COTA Website** at [www.ctacnmi.com](http://www.ctacnmi.com): COTA maintains a website about its activities and programs, including publications, and other relevant information.
- **Board Meetings.** The COTA Advisory Board holds quarterly meetings and the public is invited to attend.
- **Public Meetings.** When new services is proposed information is disseminated to the neighborhoods affected and public meetings are scheduled.
- **Customer Complaint Process.** Citizens may call the Special Assistant for Public Transportation at Tel: 670-664-2682 to lodge a complaint or comment. All complaints/comments are researched and response is given back to the citizen. The COTA’s transit comment/complaint process is updated annually as needed.
- **Annual Federal Grant Application.** We submit to the Department of Transportation annually an application for funding. The application requests funding for both capital and operating assistance. Part of the annual application is a public notice, which includes a 30-day public comment period.

**VIII. The COTA will provide updated information on our website, [www.ctacnmi.com](http://www.ctacnmi.com) regarding any investigations, lawsuits and/or complaints lodged against the transit system in order to comply with federal regulations. The format used in this notification is below:**

List of Investigations, Lawsuits and Complaints

	Date	Basis of complaint (race, color, or national origin)	Status	Action(s) Taken
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

## Investigations

As of September 12, 2023, COTA has no active lawsuits, investigations, or complaints alleging discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.

## IX. Systemwide Service Standards and Policies

To prevent discriminatory service design or operation, the FTA 49 CFR Section 21.5(b) (2) and (7), Appendix C to 49 CFR part 21 requires transit agencies to adopt systemwide service standards and system service policies. Systemwide service standards are required for vehicle load, vehicle headway, on-time performance, service availability, distribution of transit amenities, and vehicle assignment.

### Service Standards

#### Vehicle Load Standards:

Vehicle Load Factor is described as follows by FTA Circular 4702.1B:

Vehicle load can be expressed as the ratio of passengers to the total numbers of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times.

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 14 passengers for a 15' mini-bus, 20 passengers for 27', and 22 passengers for 29' medium-duty buses.

Vehicle Type	Average Passenger Capacities			Maximum Load Factor
	Seated	Standing	Total	
ADA accessible 29' medium-duty, low floor bus	22	0	22	1.0
ADA accessible 27' medium-duty, low floor bus	20	0	20	1.0
ADA Accessible 15' mini-bus	14	0	14	1.0

**Vehicle Headway Standards:**

Vehicle Load Factor is described as follows by FTA Circular 4702.1B:

Vehicle headway is the amount of time between five (5) vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g. 15 minutes). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination.

Due to the global pandemic in March 2020 the Commonwealth Office of Transit Authority (COTA) temporarily suspended its Fixed Route Services in the CNMI. COTA had to reassess the routes in Saipan to gauge the actual time and minutes that the service operates on the Green Line, Blue Line, and Red Line. Headway for the Green Line shall take every 30 minutes or better, for the Blue Line, every 35 minutes or better, and for the Red Line, which is every 15 minutes or better from early morning to late in the evening, seven days a week. This is only the **PROPOSED Fixed Route System**.

Services on all routes will be available as the buses will be simultaneously running through its designated routes. If anything shall change in regards to the routes, notices will be issued to the general public at least sixty (60) days prior to the implementation of any additional routes.

Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to major transportation developments, land use connectivity, and transportation demand management and funding availability.

**WEEKDAY (Monday to Friday)**

**Blue Line Service Beach Road to Koblerville**

6:30 am-8:30 pm

**Green Line Service Middle Road to NMC**

6:30 am-8:30 pm

**Red Line Service NMC to Koblerville (Connecting Route between Blue & Green Line Routs)**

6:30-8:30 pm

**SATURDAY, SUNDAY, & HOLIDAYS**

**Blue Line Service Beach Road to Koblerville**

6:30 am-8:00 pm

**Green Line Service Middle Road to NMC**

6:30 am-8:00 pm

**Red Line Service NMC to Koblerville (Connecting route between Blue Line & Green line Routes)**

6:30 am-8:00 pm

**On-Time Performance Standards:**

On-time performance is described as follows by FTA Circular 4702.1B:

On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be “on time.” For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measured against the level of performance for the system.

A vehicle is considered on time if it departs a scheduled time point no more than 1 minute early and no more than 5 minutes late. COTA’s on-time performance is 90% or greater. The COTA continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

**Service Availability Standards:**

Service availability is described as follows by FTA Circular 4702.1B:

Service availability is a general measure of the distribution of routes within a transit provider’s service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density.

The Commonwealth Office of Transit Authority will distribute transit service so that 90% of all residents and businesses in the service area are within ¼ mile walk of bus service.

## **Service Policies**

### **Background**

FTA requires that all providers of fixed route public transportation develop qualitative policies for the following procedures. These policies are to be set by individual transit providers; therefore, these policies will apply to individual agencies rather than across the entire transit industry.

- Vehicle Assignment
- Transit Amenities

### **COTA's Vehicle Assignment Policy**

Vehicle assignment is described as follows by FTA Circular 4702.1B:

Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods.

Vehicles shall be assigned to specific routes and trips according to the following guidelines. These guidelines may be modified if operational and scheduling needs require:

- 29' Medium-Duty Bus: The standard bus for all routes.
- 27' Medium-Duty Bus: The standard bus for all routes.
- 15' Mini-Bus: The will be used as spare.

Medium buses are deployed on frequent service and other high-ridership routes, so these buses carry a higher share of ridership than their numerical proportion of the overall bus fleet. All buses are equipped with air conditioning.

Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Start-up or local routes with lower ridership may be assigned small buses rather than the 29-foot or the 27-foot buses.

### **COTA's Transit Amenities Policy**

Transit amenities are described as follows by FTA Circular 4702.1B:

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed-route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit

users have equal access to these amenities. This...is not intended to impact funding decisions for transit amenities. Rather, this... applies after a transit provider has decided to fund an amenity.

Transit amenities are distributed on a system-wide basis. Transit amenities include shelters and benches. The location of transit is determined by factors such as ridership, individual requests, staff recommendations, and vendor preference (in the case of shelters which feature advertisements).

## **X. Title VI Equity Analysis**

COTA has completed a Title VI Equity Analysis during the planning stages with regard to the selection of its proposed administrative building and maintenance facility's location in Lower Base, Saipan without regard to race, color, or national origin.

## **XI. Sub-recipient Title VI Plan**

At this time and as an entity that operates a transit system, COTA does not plan or budget for sub-grant awards to private or public entities; therefore, COTA does not have any sub-recipients. However, COTA does bid and contract out goods and services to private entities to meet COTA's grant goals and milestones. Although COTA does not sub-awards its FTA grants to private and public entities, COTA does ensure its contractors comply with FTA requirements and FTA Contract Clauses as applicable.

## **Appendix A**

### **Employee Annual Education Form**

#### **Title VI Policy**

No person 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.

All employees of the Commonwealth Office of Transit Authority (COTA) are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to Alfreda Camacho Maratita, Special Assistant for Public Transportation.

In all dealings with citizens, use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to address them without regard to race, color or national origin.

## Appendix B

### Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of the Commonwealth Office of Transit Authority Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B.

---

Your signature

---

Print your name

---

Date

**Appendix C**

**COTA Title VI Complaint Form**

**Instructions:**

You have one-hundred eighty (180) calendar days from the date of alleged discrimination to submit your complaint. Please fill the form below.

**Contact Information**

---

Name:

---

Address:

---

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Home Phone: \_\_\_\_\_ Work Phone: \_\_\_\_\_

Email:

---

**Discrimination Complaint**

---

Name of Staff Person that You

Believe Discriminated Against You:

---

Date of Alleged Incident:

---

You were discriminated because of:

- Race
- Color
- National Origin

**Explain as briefly and clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently than you. Also attach any written material pertaining to your case:**

Signature:

Date:

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Commonwealth Office of Transit Authority  
COTA Administrative Building & Maintenance Facility  
12841 Lower Base Dr., Saipan  
Caller Box 10007, Saipan, MP 96950  
Phone: 670-664-2682 | [www.ctacnmi.com](http://www.ctacnmi.com)

## Appendix D

### Letter Acknowledging Receipt of Complaint

Today's Date  
Ms. Jo Doe  
P.O. Box 123  
Saipan, MP 96950

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against Commonwealth Office of Transit Authority alleging \_\_\_\_\_.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by calling 670-664-2682, or write to me at Caller Box 10007, Saipan MP 96950.

Sincerely,

Alfreda Camacho Maratita  
Special Assistant for Public Transportation

## Appendix E

### Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date  
Ms. Jo Doe  
P.O. Box 123  
Saipan, MP 96950

Dear Ms. Doe:

The matter referenced in your letter of \_\_\_\_\_ (date) against the COTA alleging Title VI violation has been investigated. (An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. (If a hearing is requested, the following sentence may be appropriate.) You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Alfreda Camacho Maratita  
Special Assistant for Public Transportation

## Appendix F

### Letter Notifying Complainant that the Complaint Is Not Substantiated

Today's Date  
Ms. Jo Doe  
P.O. Box 123  
Saipan, MP 96950

Dear Ms. Doe:

The matter referenced in your complaint of \_\_\_\_\_ (date) against the COTA alleging \_\_\_\_\_ has been investigated. The results of the investigation did not indicate that the provisions of the Title VI of the Civil Rights Act of 1964 had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

The COTA has analyzed the materials and facts pertaining to your case for evidence of the COTA's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from COTA, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at

Federal Transit Administration Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor-TCR  
1200 New Jersey Ave., SE  
Washington, DC 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Alfreda Camacho Maratita, Special Assistant for Public Transportation

## Appendix G

**Samples of Narrative to be included in posters to be displayed on COTA's website and in public areas of the COTA's office, including the reception desk, meeting rooms, revenue vehicles, facilities, etc. This public notice is also translated into Carolinian, Chamorro and Filipino (Tagalog) languages.**

### TITLE VI

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground 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" (42 U.S.C. Section 2000d).

COTA is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. **If you feel you are being denied participation in or being denied benefits of the transit services provided by COTA, or otherwise being discriminated against because of your race, color, national origin, you may contact:**

Alfreda Camacho Maratita  
Special Assistant for Public Transportation  
Commonwealth Office of Transit Authority  
COTA Administrative Building & Maintenance Facility  
12841 Lower Base Dr., Saipan  
Caller Box 10007, Saipan, MP 96950  
Tel: (670) 664-2682  
Email: [alfredac.maratita@gov.mp](mailto:alfredac.maratita@gov.mp)  
Website: [www.ctacnmi.com](http://www.ctacnmi.com)

## Appendix H

### Advisory Board Composition

MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES Title 49; CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.” Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

Commonwealth Public Transportation Advisory Board (CPTAB). CPTAB is comprised of representatives from Saipan, Rota, Tinian and Northern Islands. The board has the authority and primary responsibility to conduct reviews related to transit activities and advise the Special Assistant for Public Transportation (Executive Body) on appropriate measures to be taken for the overall planning direction of the region.

COMMUNITY	REPRESENTATIVE(S)
CNMI-wide	A representative from the business community (VACANT)
CNMI-wide	Alfreda Camacho Maratita, Special Assistant for Public Transportation
CNMI-wide	Donna Flores, Public School System
CNMI-wide	Ray N. Yumul, Secretary of Public Works
Municipality of Tinian & Agrihan	Edwin P. Aldan, Mayor of Tinian & Agrihan
Municipality of Rota	Aubry M. Hocog, Mayor of Rota

### Statistical Data of Communities:

The information below was provided through the CNMI Department of Commerce

Demographic Estimates located at:

<https://data.census.gov/cedsci/table?g=0400000US69,69%240500000,69%240600000,69%241600000&d=DECIA%20Northern%20Mariana%20Islands%20Demographic%20Profile&tid=DECENNIALDPMP2020.DP1>

Geographic Area	Total Pop	White	Black	Asian	Hawaiian & Pacific Islanders	Other	Two or More Ethnic Origins	Hispanic
Saipan	47,329	1,015	65	22,054	20,665	65	3,453	554
Tinian	2,044	23	2	770	1,033	66	213	25
Rota	1,893	28	1	557	1,212	3	92	17
1.2% of the population identifies as two or more races.								

Race and Gender Statistics for CPTAB Committee Member:

	RACE		GENDER	
	Pacific	White	Male	Female
CPTAB Members	4	0	3	1