

**TEAMSTERS, CHAUFFEURS, WAREHOUSEMEN & HELPERS  
AND PROFESSIONAL, CLERICAL, PUBLIC AND MISCELLANEOUS EMPLOYEES,  
LOCAL UNION NO. 533 OF DONNER & THE TAHOE BASIN, RENO AND  
NORTHERN NEVADA**

*Debbie Calkins  
Secretary- Treasurer*



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*Gary Watson  
President*

August 4, 2021

Mr. Geo Jackson  
General Manager  
MTM Transit  
600 Sutro Street  
Reno, NV 89512

Mr. William A. Thomas  
Executive Director  
RTC  
P. O. Box 30002  
Reno, Nevada, 89520

Re: Teamsters Local 533 and Keolis Transit America, Inc.

Dear Gentlemen:

RTC is using Teamster Union members at MTM to perform struck work in violation of the RTC – MTM contract, in a waste of public money and in violation of Federal DOT procurement statutes. The RTC has instructed MTM to take over several Keolis fixed routes and assign drivers to cover a special route along Virginia Street for “Hot August Nights.” Attached are routes MTM drivers have been ordered to perform. The Union demands that RTC and MTM stop now.

This violates the MTM - RTC agreement in three ways. First, under section 302(B) of the contract, MTM is only responsible for operating RTC ACCESS paratransit services. Second, under § 303(A)(2) of the contract, RTC can only add “other types of new services needed to meet changing paratransit demand ...” RTC’s service changes are not paratransit services. Third, RTC violates § 303(B) of the contract by skipping the requirement to submit a written proposal to MTM and give MTM 15 calendar days to draft a cost estimate. Under § 303(B)(2), MTM must provide RTC with a written estimate of the cost, impact, necessity and the feasibility of such change. RTC and MTM have made no effort to comply with any of these provisions.

MTM can charge however much money it wants after the fact because the cost has not been negotiated. This is a waste of public money.

Finally, RTC and MTM are violating Federal law. Under 49 U.S.C. § 5325 (a), “Recipients of assistance under this chapter shall conduct all procurement transactions in a manner that provides full and open competition as determined by the Secretary.” 49 U.S.C. § 5325(j), “Federal financial assistance under this chapter may be provided for contracts only if a recipient awards

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Affiliated with the International Brotherhood of Teamsters

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such contracts to responsible contractors possessing the ability to successfully perform under the terms and conditions of a proposed procurement.” The RTC–MTM arrangement to perform struck work does not even remotely comply with these requirements. They made the deal in secret and MTM does not have the employees necessary to run a fixed route system.

RTC and MTM should immediately stop performing this work.

Sincerely,

A handwritten signature in black ink that reads 'Chris Fuqua'.

Chris Fuqua  
Vice President/Business Agent  
Teamsters Local 533