

REGULATION OF URBAN PUBLIC TRANSPORT CONCESSIONS BASED ON FEDERAL LAW NO. 12,587/2012: AN INSTRUMENT FOR CITY DEVELOPMENT

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Submitted November 5, 2024 - Accepted December 23, 2024

DOI: 10pts.15628/holos.2024.17973

ABSTRACT

This article analyzes the regulation of Urban Public Transportation (UPT) as a strategic tool for urban development in Brazil, with a focus on the role of municipalities as entities responsible for the concession and oversight of this essential service. The analysis is grounded in national legislation, particularly the Brazilian Federal Law No. 12,587/2012, which establishes the National Urban Mobility Policy. Based on a theoretical and documentary approach, the study interprets the legal provisions and connects them to the concept of development understood as the realization of fundamental rights within the urban space. Initially, the article discusses the importance of UPT in ensuring mobility as a social right. It then contextualizes the main challenges faced by public transportation systems in Brazilian cities, such as declining

demand, deterioration of service quality, and economic-financial imbalances in operations. In light of this scenario, the research argues that appropriate regulation of UPT public concessions is one possible pathway to improving service delivery. As its main contribution, the article proposes an analytical systematization of the regulatory guidelines established in Brazilian legislation, organized into six categories: service planning, social participation and oversight, performance-based incentives for concessionaires, fare affordability, transparency, and supervision. These categories provide technical and legal support for public managers, urban planners, and researchers to enhance concession models, strengthen governance, and expand access to urban mobility in a fair, efficient, and sustainable manner.

KEYWORDS: Urban Public Transportation, Regulation, Development.

Regulação das Concessões de Transporte Público a partir da Lei Federal nº12.587/2012: um instrumento para o desenvolvimento das cidades

RESUMO

Este artigo analisa a regulação do Transporte Público Urbano (TPU) como ferramenta estratégica para o desenvolvimento urbano no Brasil, com foco na atuação dos municípios enquanto entes responsáveis pela concessão e fiscalização desse serviço essencial. A análise está ancorada na legislação nacional, especialmente na Lei Federal brasileira nº 12.587/2012, que institui a Política Nacional de Mobilidade Urbana. A partir de uma abordagem teórico-documental, o estudo interpreta os dispositivos legais e os articula ao conceito de desenvolvimento entendido como a efetivação de direitos fundamentais no espaço urbano. Inicialmente, discute-se a relevância do TPU para a garantia da mobilidade como direito social. Em seguida, o artigo contextualiza os principais desafios enfrentados pelos sistemas de transporte coletivo nas cidades brasileiras, como a redução da demanda, a precarização da oferta e o desequilíbrio

econômico-financeiro das operações. Diante desse cenário, a pesquisa argumenta que a regulação adequada das concessões públicas de TPU é um dos caminhos possíveis para qualificar a prestação do serviço. Como principal contribuição, o artigo propõe uma sistematização analítica das diretrizes regulatórias previstas na legislação brasileira, organizadas em seis categorias: planejamento do serviço, participação e controle social, incentivos ao desempenho das concessionárias, modicidade tarifária, transparência e fiscalização. Essas categorias fornecem subsídios técnicos e jurídicos para que gestores públicos, planejadores urbanos e pesquisadores possam aprimorar os modelos de concessão, fortalecendo a governança e ampliando o acesso à mobilidade urbana de forma justa, eficiente e sustentável.

PALAVRAS-CHAVE: Transporte Público Urbano, Regulação, Desenvolvimento.

1 INTRODUCTION

Urban Public Transport (UPT) is a form of collective transport designed to ensure the efficient movement of people in urban areas at low cost, in a sustainable and effective manner, ensuring the right of all citizens to move freely, accessibly, and safely within cities. Because of these characteristics, UPT is a central axis in addressing the problem of urban mobility, especially in the context of disorganized growth and unequal occupation of urban spaces.

In Brazil, UPT services are primarily provided through public concession schemes, in which the public authority retains ownership of the service but delegates its operation to private entities via contractual agreements. Nonetheless, the structuring, planning, and supervision of the service remain the responsibility of public administration. Therefore, the public authority plays a fundamental role in regulating UPT services to ensure their proper delivery. Under Brazilian law, Federal Law No. 12.587/2012, which instituted the National Urban Mobility Policy, introduced important guidelines and tools for regulating UPT concessions, which must be observed by municipal governments.

The decision to study the regulation of UPT concessions arises from the growing importance of urban mobility as a structural public policy in Brazilian cities. The absence of an efficient public transport system directly impacts the population's access to fundamental rights such as healthcare, education, and employment. Based on this, the objective of this study is to contribute to the improvement of UPT regulation by public administrators, offering a systematization of the tools provided by Federal Law No. 12.587/2012 in light of the principles of inclusive and sustainable urban development.

In this context, the central objective of this article is to analyze the regulation of Urban Public Transport concessions under Brazilian Federal Law No. 12.587/2012 by proposing an interpretive categorization of its regulatory guidelines, highlighting their contributions to the promotion of urban development understood as the realization of fundamental rights. To achieve this, the research systematizes the regulatory guidelines and instruments established in national legislation, proposing a categorization that may support municipal public administrators in formulating more accessible, inclusive, and sustainable mobility policies.

2 METHODOLOGY

This article adopts a qualitative and theoretical-documentary approach, based on bibliographic review and normative analysis of Brazilian legislation on urban mobility, particularly Federal Law No. 12.587/2012, which establishes the National Urban Mobility Policy. This approach was chosen due to the central objective of the work: to systematize and interpret the regulatory guidelines provided in current legislation, relating them to the concept of urban development as the realization of rights.

The investigation was conducted through the analysis of primary sources — such as the federal legislation itself (Laws No. 12.587/2012 and No. 8.987/1995), technical and normative

documents — and secondary sources, based on academic books and scientific articles discussing urban mobility, public concessions, and development policies.

Data analysis was carried out qualitatively, through the identification, categorization, and interpretation of the regulatory tools provided in the legislation, organized into six core categories: service planning, social participation and oversight, performance incentives, fare affordability, transparency, and supervision.

This categorization was built inductively based on critical reading of legislation and regulatory documents, and later validated through comparison with specialized literature, ensuring coherence between empirical data and the theoretical frameworks adopted.

3 LITERATURE REVIEW

3.1 The concept of 'development'

The term “development” is widely used across different fields of knowledge, assuming various meanings depending on the context. In this study, the concept of development is understood as the realization of fundamental rights in urban spaces, particularly those related to the right to mobility.

Especially after World War II (1939–1945), development theories gained significant prominence in public debates, each seeking to analyze the diverse economic and social realities of countries, as well as their historical processes of formation and integration in the global landscape (Nierdele & Radomsky, 2016). However, the transformations brought about by the post-war period in people’s daily lives revealed that analyzing development required a broader understanding than economic growth indicators alone.

This is because development is not merely a metric applied to states and markets, but rather a process centered on people — diverse social subjects with complex desires, needs, and deprivations.

It is in this context that Sen’s work (2000) is situated. He understands development as the expansion of people’s freedoms to achieve their capabilities and live the lives they value. For Sen, development is the condition that enables individuals to realize the life opportunities they aspire to. Similarly, Sachs (2020) argues that development can be seen as the historical process of achieving and implementing rights.

Thus, the realization of rights is an essential condition for both individual and collective progress. Ensuring the right to transportation, for instance, directly supports access to work, education, healthcare, and civic participation, thereby promoting social progress and reducing urban inequalities.

This work, therefore, adopts the conception of development as synonymous with the realization of fundamental rights within the urban context, directly linking public mobility policies to the building of fairer, more accessible, and sustainable cities.

2.2. Development and Urban Public Transport

For a citizen to fully realize their capabilities within a city, they must have access to its various urban spaces. In this sense, the right to mobility becomes an essential requirement for urban development. This right becomes even more relevant in the face of the historical urban growth process marked by severe socio-spatial inequalities (Oliveira, 1977). As a result of this process, city outskirts have become increasingly distant, precarious, and lacking access to basic rights (Rolnik, 1999).

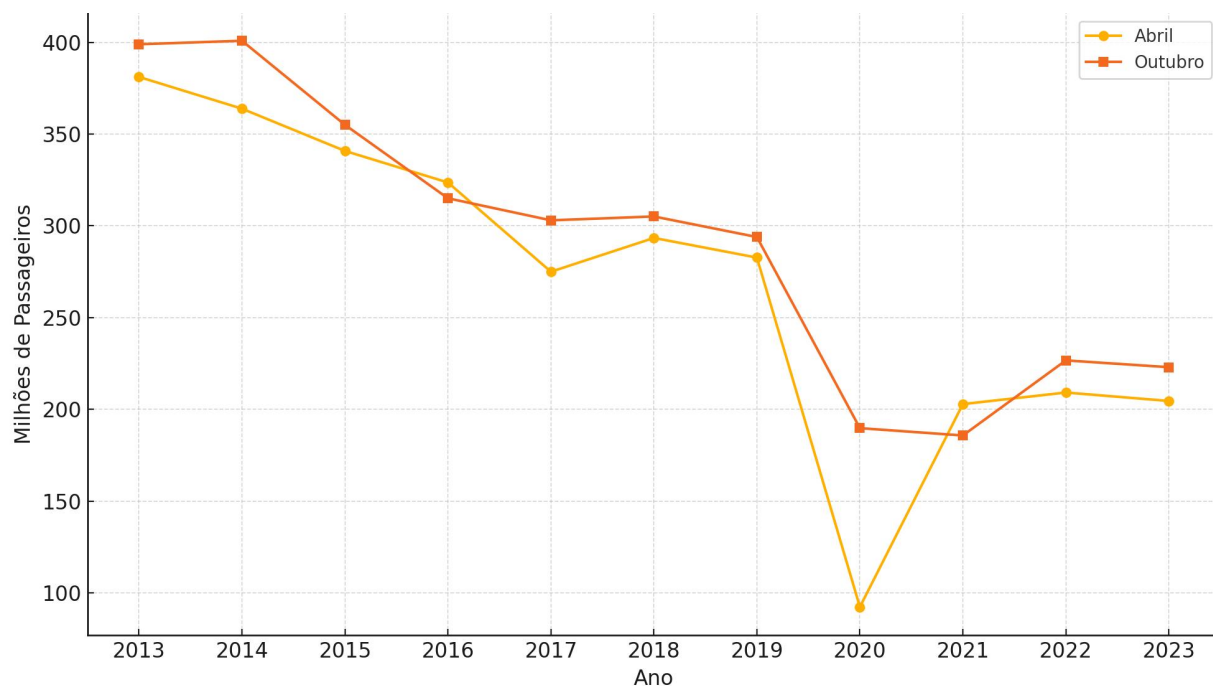
Due to this segregation, access to urban services and activities has come to depend on an efficient, accessible, and inclusive public transportation system. Silva and Lapa (2019) emphasize that motorized public transport is indispensable for ensuring access to essential services for poorer populations. Similarly, Vasconcellos (2014) points out that these populations are the most affected by long travel times, discomfort, and lack of transportation alternatives.

On the other hand, UPT services are facing significant challenges in Brazilian cities. Carvalho (2016) notes a growing reliance on individual vehicles, resulting in increased traffic congestion and deterioration of collective transport options. As a consequence of this decline, Carvalho (2021) highlights worsening urban problems, such as rising traffic, pollution, road accidents, and the exclusion of low-income populations from accessing services and opportunities within cities. Likewise, Pereira (2021) shows a gradual replacement of public transport by private motorized transport, pushing UPT into a vicious cycle of declining ridership, rising fares, and deteriorating quality.

Data from the National Confederation of Transport (2024) show that the percentage of the population that considers public transport a major issue rose from 12.4% in 2017 to 24.3%. During the same period, the percentage of bus users dropped from 45.2% to 30.9%. The study also reveals that social classes C and D represent the majority of public transport users: 79.2% for buses, 77.1% for urban/metropolitan trains, and 62.3% for subways.

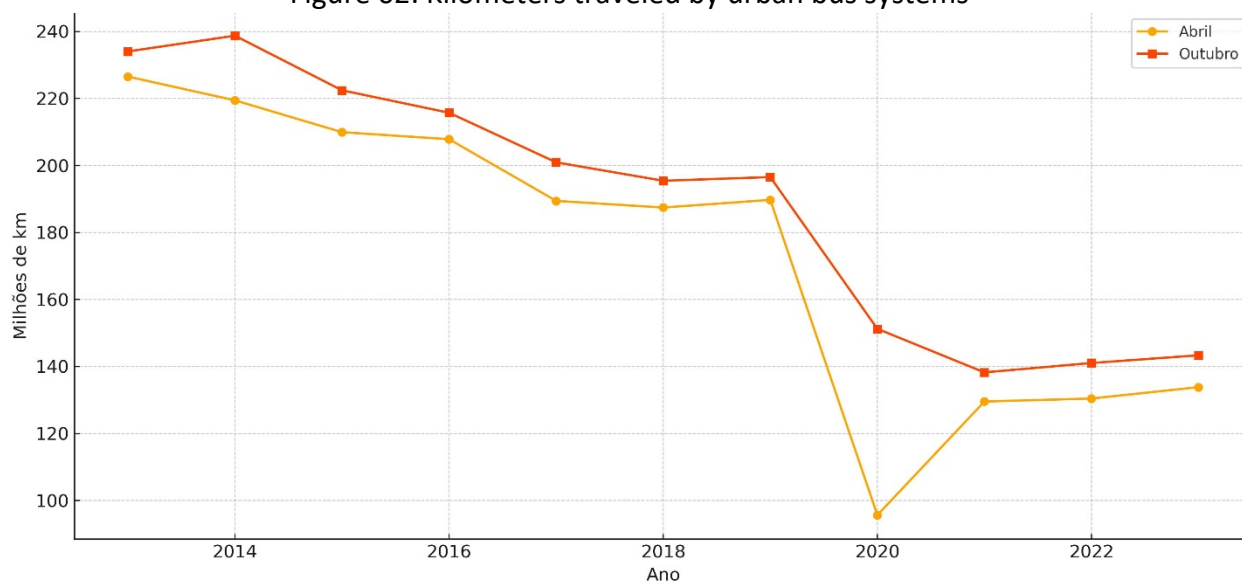
Similarly, data from the NTU Yearbook 2023:2024, by the National Association of Urban Transport Companies, show a drop in the number of equivalent passengers transported in urban systems, from 381.1 million/month (April 2013) to 204.6 million/month (April 2023). In the same period and cities analyzed, the report also notes a reduction in the kilometers traveled by urban bus systems, from 226.5 million/month to 133.8 million/month.

Figure 01: Equivalent passengers transported in urban systems



National Association of Urban Transport Companies – Brasília: NTU, 2024, ISSN: 2317-886

Figure 02: Kilometers traveled by urban bus systems



National Association of Urban Transport Companies – Brasília: NTU, 2024, ISSN: 2317-886

2.3. Urban Public Transport Concession

Urban Public Transport (UPT) is a responsibility assigned to municipalities by the Federal Constitution. Holding ownership of the service, municipalities may choose to provide it directly or delegate it through public concessions, as established in Article 30, item V of the Constitution. Given the complexity of operating such services, municipalities generally opt to grant concessions to the private sector.

A public concession is a legal mechanism, governed by federal law, that allows the direct administration to delegate the provision of a public service to a private operator. In this arrangement, ownership of the service—as well as responsibility for its organization, planning, supervision, and regulation—remains with the public authority. The concessionaire, in turn, is tasked with operating the service.

The terms of the concession are defined in a concession contract signed between the public authority (“Granting Authority”) and the company responsible for providing the service (“Concessionaire”). Typically, the concessionaire is selected through a public bidding process. In addition to the contract, the concession is subject to legal limitations, particularly Federal Law No. 8.987/1995, which regulates public concessions in Brazil.

The concession contract, within the limits of the law, defines the rights and obligations of both the Granting Authority and the Concessionaire. It establishes the structure of the concession model, the rules for operating the UPT system, financing and remuneration of the concessionaire, and any performance indicators to evaluate service quality. The contract also empowers the municipality to oversee and monitor the service, including the legal authority to apply penalties in cases of non-compliance.

Therefore, the municipality holds significant responsibility in defining and monitoring the chosen concession model, as it is in charge of structuring, planning, and supervising the concession.

In general terms, the structure of a UPT concession in Brazil can be summarized as follows:

Table 01: Public Concession of Urban Public Transport (UPT) in Brazil

Concession Element	Description	Legal Basis
Service ownership	Municipalities	Federal Constitution of 1988, art. 30, item V
Provision model	Indirect provision through public concession to the private sector	Law No. 8.987/1995
Public authority responsibilities	Plan, organize, supervise, and regulate the service	Law No. 8.987/1995 and Law No. 12.587/2012
Selection of concessionaire	Carried out through a public bidding process, which defines rules and obligations	Law No. 8.987/1995

Concession Element	Description	Legal Basis
Concession contract	Instrument that structures the service model, defines goals, indicators, and oversight criteria	Law No. 8.987/1995
Supervision and penalties	Supervision is the responsibility of the municipality, based on the contract and performance indicators	Law No. 12.587/2012, arts. 7 to 9

4 REGULATION OF URBAN PUBLIC TRANSPORT

When a public service has its execution outsourced to the private sector, it is the duty of the public authority to take precautions and establish clear rules that guarantee the fulfillment of the public purpose of that service. Regulation of a service, in this sense, is the set of rules that structure, organize, and define the actions to be performed in the provision of the service. According to Marques Neto (2002), regulation is an activity in which the State conditions, restricts, or encourages a certain activity carried out by private entities, based on the public purpose that the State itself is responsible for guaranteeing and preserving. State regulation, therefore, is the creation of rules by the State to encourage or inhibit actions of private agents with the purpose of promoting the public interest in the sector operated by such agents (Coutinho, 2019).

Since in the public concession of Urban Public Transport (UPT) the execution of the service is outsourced to the private sector, it is up to the State, as the Granting Authority, to create the necessary rules to ensure the achievement of the public purpose of the service, as well as to guarantee its supervision and oversight. The objective of regulation in the UPT service is to ensure that transportation is provided in accordance with the law and the rights of users, guaranteeing a quality, accessible, safe, and inclusive service for all citizens. In this case, it is understood that the market alone is not capable of ensuring the fulfillment of public interests, since its operational logic is based exclusively on economic rationality.

Gomide and Carvalho (2016), analyzing UPT as an essential public service, explain this conception based on four distinct arguments for state regulation of UPT. The first argument is based on the fact that UPT is a network economy case, in which each passenger added to the service benefits all users by helping to reduce its cost. For example, imagine two bus companies serving the same route, where demand could be sufficiently met by a single vehicle. Such a situation would increase operational costs and, consequently, the cost of the service to users, as well as increase traffic congestion on the route.

The second argument is that UPT generates positive externalities, meaning the benefits of its service are enjoyed both by users and non-users. For example, using UPT instead of individual vehicles helps reduce pollution and traffic congestion.

The third argument concerns the fact that it is a service at risk of predatory and inefficient competition. One point of this argument is precisely the network economy example. Furthermore, while free competition could lead to oversupply on certain routes, others might be left isolated and without service because they are not financially viable, thereby harming the universality of the service.

The fourth and final argument is that governance over UPT is, above all, a demand of community interest — a political demand that must be coordinated by agents who have legitimacy to represent the interests and rights of the population, that is, public agents.

These arguments can be seen in the table below, which also relates each highlighted point with empirical evidence observed from data collected in the NTU Yearbook 2023:2024:

Table 02: Foundations for the Regulation of UPT in Brazil

Basis for Regulation	Theoretical Justification	Empirical Evidence (NTU, 2024)
Network Economy	Integrated operation under public control generates greater efficiency and lower cost per passenger	The kilometers traveled decreased by 40.9% from April 2013 to April 2023, indicating network contraction and possible inefficiency.
Positive Externalities	Public transport reduces congestion, emissions, and inequalities	The average fleet age reached 6 years and 5 months (the highest in the historical series), affecting service attractiveness and environmental sustainability.
Avoid Predatory Competition	Unregulated competition causes overlap of profitable routes and abandonment of peripheral routes	Productivity has fallen by 37.8% since 1993, with continuous loss of passengers even in structured systems.
Public Interest and Guarantee of Social Rights	The State must ensure mobility as a social right and coordinate the service transparently	The demand for paying passengers fell 44.1% in the last decade; 365 cities already adopt some subsidy to guarantee access.

5 ANALYSIS OF REGULATORY TOOLS IN THE NATIONAL URBAN MOBILITY POLICY: A PROPOSAL FOR CATEGORIZATION

In concrete terms, the Brazilian legislation that has most advanced in defining criteria and regulatory tools for the Urban Public Transport (UPT) service is Federal Law No. 12,587/2012, which established the National Urban Mobility Policy.

According to a study by IPEA (2012), this law was created in response to the urban mobility crisis faced by many municipalities across the country. In addition to providing general guidelines for urban mobility nationwide, creating rules and obligations for all federative entities, Federal Law No. 12,587/2012 established important tools to be used by municipalities in the planning, organization, and supervision of UPT services. These guidelines and instruments are mainly organized in Chapter II of the law, which addresses the “Guidelines for the Regulation of Urban Public Transport Services.” These guidelines and tools include everything from rules for tariff definition to rules ensuring transparency and social control of the service.

By systematically organizing the rules laid out in the legislation, six categories of regulatory issues can be identified that municipalities must use in regulating UPT, as detailed below.

4.1. Service Planning

This category includes guidelines and tools to ensure that the municipality adequately plans the service before and during its concession. Its purpose is to ensure that managers can plan and organize the concession to efficiently meet user demands, with appropriate allocation of routes, itineraries, infrastructure, and funding.

Generally, planning tools involve the development of prior and ongoing technical evaluations, with studies that identify service demands and propose efficient organization of routes and itineraries, aiming to serve all citizens at the lowest possible cost. Furthermore, the legislation requires municipalities to establish a Municipal Urban Mobility Plan, a legally regulated urban planning instrument that must consider not only UPT but all other modes and elements related to urban mobility.

Finally, the legislation also requires municipalities to ensure their own adequate budget allocation to finance public policies focused on UPT, thus integrating public transportation issues into the political agenda of municipal managers.

4.2. Participation and Social Control

This category aims to guarantee democratic and decentralized management of the UPT system, ensuring community participation in decisions regarding planning, execution, and control of public transport. This is based on the assumption that active community participation is fundamental to preserve citizens' interests and rights through public policies aligned with users' realities and needs.

To this end, the legislation mandates the holding of periodic public hearings and consultations by public authorities to allow the population to express their views on UPT policies.

The law also requires popular participation to be guaranteed through collegiate bodies that include representatives from society, the Executive Branch, and service operators. An example of such a body is municipal councils, established by municipal law, which ensure civil society's participation in government decisions regarding UPT.

Lastly, the legislation requires municipalities to create ombudsman offices specifically for receiving complaints, reports, and suggestions, as well as to implement systematic communication, user satisfaction assessments, and accountability procedures toward the population.

4.3. Performance Incentives

This category focuses on defining mechanisms to incentivize good performance by concessionaires, aiming to improve service delivery to users.

Such mechanisms revolve around the possibility for the Granting Authority to establish quality and performance targets for the concessionaire, measurable through pre-established indicators. Based on these targets and indicators, the municipality can set up incentive policies for the concessionaire's performance, through bonuses or penalties depending on whether goals are met or not.

The legislation empowers municipalities to link concessionaire remuneration to performance parameters, which can also serve as control and evaluation mechanisms for applying penalties. These mechanisms contrast with the traditional concessionaire payment model, where all operational costs are passed on to the tariff, providing no incentive for efficient service management. Moreover, these tools offer an important means of monitoring and supervising service quality standards, promoting good user service.

4.4. Fare Affordability

This category seeks to ensure that the fare charged to users is inclusive and affordable, enabling access to UPT at a low cost. Fare affordability stems from the understanding that UPT is a right guaranteed to all citizens regardless of their financial capacity. Thus, ensuring fare affordability, or even its exemption, is a legal requirement demanding that municipal authorities provide appropriate funding instruments.

One of the key tools provided by legislation is the possibility of public subsidy for fares, where the municipality partially or fully finances the cost of the service, ensuring lower fares for users or even fare-free service. This aligns with Federal Law No. 12,587/2012's provision that fare funding must include contributions from both direct and indirect beneficiaries—that is, users and non-users alike.

Additionally, the law provides other important tools to achieve fare affordability, such as fare integration. Through this mechanism, the UPT system is organized so that passengers requiring multiple modes or routes to reach their destination pay a single fare or receive progressive discounts on additional fares.

The legislation also allows for alternative revenue sources to fund the service, such as advertising on vehicles and infrastructure. It also prioritizes the use of electronic fare credits (electronic ticketing), which facilitates fare purchases and reduces system costs.

4.5. Transparency

This category seeks to ensure full transparency of all matters related to UPT, especially since it is a fundamental public service that must be monitored and overseen by everyone. It aims to guarantee compliance with publicity as a constitutional principle, allowing the public to access all information about UPT services.

The legislation requires municipalities to publicly disclose accessible information on fare structure, review processes, tariff composition, and the impact of fare benefits on tariff prices. Operational, accounting, and financial information about the concession, contract documents, users' rights and responsibilities, and operators' obligations must also be made available.

Another essential transparency tool is the provision of information about boarding and disembarking points, itineraries, schedules, service fares, and interaction with other modes. All this information is the responsibility of the UPT concession, through the Granting Authority and Concessionaire, serving as key tools to guarantee service publicity.

4.6. Oversight

As mentioned earlier, one of the main duties of the Granting Authority in a public concession is to oversee service execution, ensuring that public objectives and contractual terms are met. Federal Law No. 12,587/2012 mandates that public authorities conduct oversight and control of delegated services, highlighting the municipalities' key role in this regard.

In this sense, three main aspects should be observed by municipal authorities to guarantee effective oversight:

First, the public authority must have a technical team available and qualified to monitor contract execution. This team is necessary to verify various aspects of service delivery, such as compliance with routes, itineraries, and bus schedules; proper vehicle maintenance; adherence to accessibility rules for people with disabilities; and satisfactory user service. The public authority may also rely on technological tools to assist in monitoring, mapping, and controlling service activities, including gathering important data related to the concession, such as passenger counts per route.

Second, periodic inspections must be conducted, with reports documenting monitoring and evaluating the services provided, so that concession execution can be tracked, improvements demanded, and contractual breaches identified.

Finally, the municipality may perform independent audits of the UPT service by hiring impartial third parties with expertise to evaluate concession services as well as operational, accounting, and financial information related to service provision. Independent audits deepen and ensure impartiality in evaluations, enabling proper concession data monitoring.

This point deserves special attention considering the common phenomenon of information asymmetry in UPT concessions. Since the concessionaire executes the service, it usually holds operational, accounting, and financial information and is responsible for providing it to the Granting Authority. Without adequate instruments and resources to monitor and audit such information, the balance of the concession is naturally compromised, leaving the public authority dependent on information supplied by the concessionaire itself.

These six regulatory tools can be summarized in the following table:

Table 03: Regulatory Tools for Urban Public Transport (UPT) in Brazil:

Regulatory Tool	Brief Explanation	Hypothetical Example of Application
Service Planning	Guidelines for organizing the concession focusing on routes, frequency, demand, and adequate infrastructure	A city government develops an operational plan that includes integration between transport modes and the creation of new lines for peripheral neighborhoods.
Participation and Social Control	Involvement of civil society through councils, public hearings, and active transparency	A city government creates a Municipal Urban Mobility Council with decision-making power to evaluate fare adjustment proposals, broadcasting sessions publicly online.
Performance Incentives for Concessionaires	Mechanisms linking part of the concessionaire's remuneration to meeting quality, regularity, and efficiency targets	A city government establishes that the concessionaire's payment index depends on achieving targets such as maintaining a fleet with an average age under 5 years and punctuality above 95%.
Fare Affordability	Measures to ensure affordable fares for the population without compromising the system's financial and economic balance	A city government adopts a policy of subsidizing the concessionaire to keep fares lower, conditioning the subsidy on meeting quality performance indicators.
Transparency	Provision of contractual, operational, and financial information in an accessible and understandable way	A city government provides monthly graphs on passengers, revenues, and costs per route via its Transparency Portal.
Oversight	Monitoring of service delivery by public agents or independent auditors based on indicators	A city government, through the responsible department, carries out monthly inspections and annual audits on mileage and electronic ticketing data.

4.7. Challenges and Limitations in the Implementation of Brazilian Federal Law No. 12,587/2012

Despite representing a significant normative advance by consolidating guidelines for urban mobility, Federal Law No. 12,587/2012 faces considerable challenges in its effective application by municipal entities. One of the main gaps observed is the absence of national mechanisms to induce or monitor local implementation of the prescribed guidelines. Many municipalities, especially small and medium-sized ones, lack institutional, technical, and budgetary capacity to develop mobility plans, structure concession models, and oversee contracts based on the parameters defined by the law.

Furthermore, informational asymmetry between granting authorities and concessionaires remains one of the greatest obstacles to effective oversight and the application of the principles of transparency and social control. The difficulty in accessing operational, financial, and accounting data compromises the regulatory capacity of municipalities and weakens the accountability of the system. These aspects indicate that, beyond applying the provisions of the Urban Mobility Law, it is necessary to develop support policies, capacity-building, and normative harmonization that allow the effective implementation of its principles in the daily management of municipal public administration.

6. Conclusions

Urban Public Transport (UPT) constitutes an essential component for the development of cities, as it directly influences the population's access to fundamental rights such as health, education, employment, and civic participation. This article demonstrated that the realization of these rights requires the existence of accessible, efficient, and inclusive urban mobility systems, whose structuring depends on public policies based on solid and effective regulatory principles.

Based on the analysis of Federal Law No. 12,587/2012, the article proposed an interpretative categorization of the regulatory guidelines applicable to Urban Public Transport concessions, structured around six analytical axes: service planning, participation and social control, performance incentives, fare affordability, transparency, and oversight. This proposal aims to contribute to the conceptual and normative organization of municipal public managers' activities, offering an analytical model that integrates legal, operational, and social foundations.

By transforming the normative framework into a concrete application matrix, the article advances toward operationalizing public policy based on technical and legal criteria. Thus, the research contributes not only to the academic debate on urban mobility but also to improving the regulation of UPT concessions in Brazil, providing support for more efficient, transparent, and sustainable governance.

In this context, the study points out that municipal public managers should strive to institutionally strengthen the regulation of UPT. This can be achieved, for example, by linking part of the concessionaires' remuneration to the fulfillment of quality and efficiency goals based on pre-established indicators; implementing urban mobility councils with qualified social participation; conducting periodic independent audits that help address informational asymmetry between the granting authority and concessionaires; and adopting tariff subsidy policies with multisectoral financing and sustainable budget planning.

The development and constant updating of the Municipal Mobility Plan also prove fundamental, as it is a structuring instrument for organizing the public transport system within the broader context of urban development.

Moreover, the study suggests that future investigations deepen the empirical analysis of the implementation of the regulatory tools systematized here, observing their effects on operational efficiency, economic sustainability, and service quality. Comparative studies between

municipalities with different regulatory models, as well as research incorporating users' perceptions of public transport, may provide relevant subsidies for improving the national urban mobility policy. Similarly, it is recommended that future research explore the impacts of regulatory guidelines on the transition to low-carbon transport systems as a way to align urban mobility policies with Brazil's environmental and climate commitments.

It is therefore concluded that the proper regulation of public UPT concessions, based on already available legal instruments, can decisively contribute to promoting more inclusive, sustainable, and integrated cities, reaffirming the role of public transport as a driver of social justice and urban development.

6 ACKNOWLEDGMENTS

The authors would like to thank CNPQ, FAPEMIG, and CAPES for the financial support granted to the projects that contributed to the development of this work.

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HOW TO CITE THIS ARTICLE:

Renó Gama, P., & Palma Lima, J. Regulação das Concessões de Transporte Público a partir da Lei Federal nº12.587/2012: Um instrumento para o desenvolvimento das cidades. *HOLOS*. Recuperado de <https://www2.ifrn.edu.br/ojs/index.php/HOLOS/article/view/17973>

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Editor: Francinaide de Lima Silva Nascimento
Ad Hoc Reviewer: Carlos Eduardo de Lima e Maisa Sales Gama Tobias



Submitted November 5, 2024
Accepted December 23, 2024
Published June 8, 2025