Date: July 10, 2020

To: Honorable City Council
               c/o City Clerk, Room 395
               Attention: Honorable Mike Bonin, Chair, Transportation Committee

From: Seleta J. Reynolds, General Manager
               Department of Transportation

Subject: **DOCKLESS BIKE/SCOOTER SHARE PILOT PROGRAM UPDATE (CF #17-1125)**

SUMMARY

As directed by the City Council (Council) in Council File (CF) 17-1125, this report provides an evaluation of the One-Year Dockless On-Demand Personal Mobility Pilot Program and describes key elements of the updated Rules and Guidelines for an annual permit-based Dockless On-Demand Mobility Program.

RECOMMENDATION

1. ADOPT the updated Rules and Guidelines for a Dockless Permitting Program and Authorize General Manager to make technical changes, as needed.
2. REQUEST City Attorney to amend Los Angeles Municipal Code (LAMC) 71.29 and any other necessary ordinances to create an annual permit program including:
    a. Draft a Penalty Schedule
    b. Draft a Revised Fee Schedule to include trip fees.
    c. Draft an Appeal Process
3. DIRECT LADOT to Report back in one year on the status of the Program

BACKGROUND

On September 4, 2018, City Council authorized the One-Year Dockless On-Demand Personal Mobility Pilot Program (Pilot Program). The Program enabled operators of shared dockless bikes and scooters (also known as micromobility vehicles) to apply for permits for fleets of up to 10,500 vehicles each. Operators could deploy the maximum number of vehicles as long as they deployed 7,500 of those vehicles in disadvantaged communities, including San Fernando Valley. Applicants submitted fees; insurance documentation; and deployment, parking, equity, and community engagement plans. LADOT required permitted operators to provide data via API's in accordance with the Mobility Data Specification (MDS), integrate with the City's MyLA311 system, take part in a shared mobility task force, and distribute surveys to riders. LADOT issued permits on March 15, 2019.

In the yearlong pilot, LADOT permitted 36,170 vehicles across eight operators. The average citywide deployment was 12,800 vehicles with the maximum deployment occurring in July 2019 with 17,700 vehicles. LADOT offered all operators who met all current requirements a six-month extension period ending on September 15, 2020.

DISCUSSION

This report provides an update on dockless services over the six-month permit extension, an overview of the One-year Dockless On-Demand Mobility Pilot Program evaluation, and a description of key elements of the updated Rules and Guidelines. As authorized by Council in CF10-0996-S1 and LAMC 71.29, these updated Rules and Guidelines will apply to new and emerging modes of transportation moving forward. With this new permitting program, LADOT will regulate all permitted modes of transportation by one permitting framework referred to as "On-Demand Mobility Program."

This analysis occurs at a unique time amidst the COVID-19 pandemic. It is with this lens that LADOT evaluates how the Dockless On-Demand Mobility Program operates and provides Angelenos viable transportation options. This report also explores how the Program can and should evolve to grapple with shifts in local, state, and federal budgets while supporting mobility access and economic recovery.

Six-Month Permit Extension

As directed by Council, the six-month permit extension began on March 15, 2020, the date the one-year permits expired. Seven operators received extensions, permitting a total of 19,300 scooters and 6,000 e-bikes. One operator, Bolt, did not reapply for the six-month extension and terminated operations prior to the original permit expiration date. Additionally, shortly after receiving a six-month extension permit, Jump ceased operations in the City of Los Angeles.

From February 15, 2020 through June 15, 2020, LADOT observed 649,632 vehicle trips with daily deployments ranging from 3,593 vehicles in February to 1,508 vehicles in June. There was a significant drop in vehicles deployed in April and May as operators removed vehicles and scaled down operations due to the COVID-19 pandemic. However, operations are increasing as of June. MyLA311 users from February 15, 2020 through May 15, 2020, submitted 844 dockless mobility service requests. Jump received the most Service Requests (243), which accounted for 29% of all Service Requests during this time period.
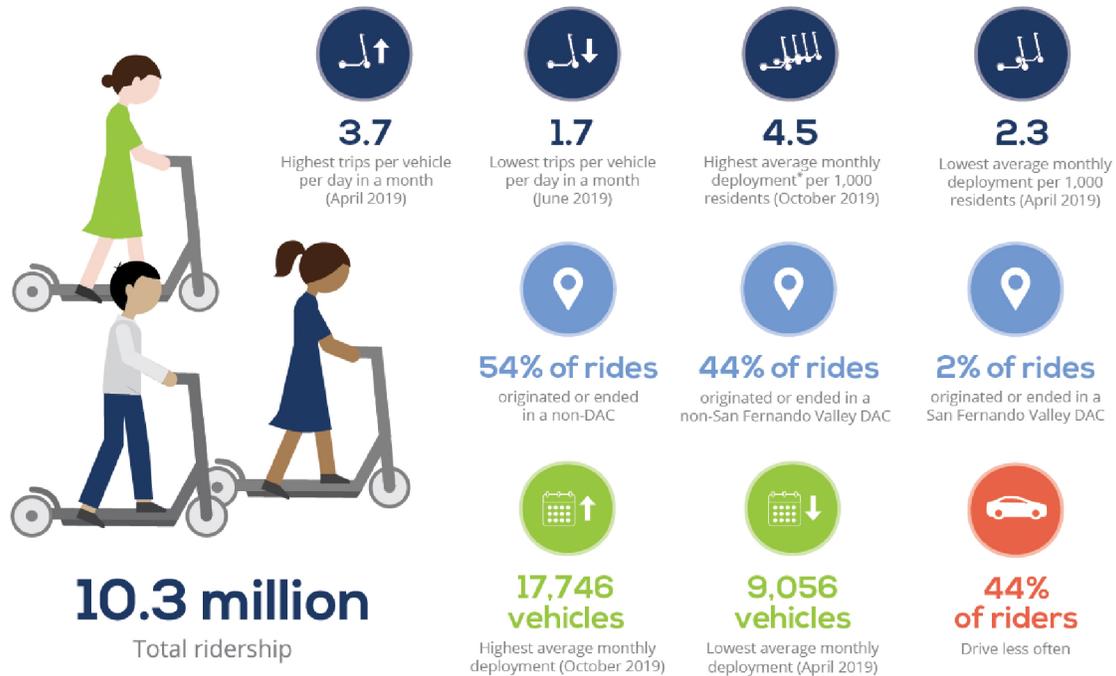
Attachment 1 contains usage, ridership, and other key statistics for the Pilot Program and Six-Month Permit Extension period.

On March 4, 2020, Mayor Garcetti declared a Local Emergency followed by the issuance of the Safer at Home Emergency Order. Consequently, on Friday, March 13, 2020, LADOT staff contacted all permitted operators requiring them to submit detailed action plans or measures describing how they were protecting the community and themselves to reduce the spread of the virus. Attachment 2 contains the official statement instructing operators to enhance their vehicle sanitation measures. As described above, the implementation of the Safer at Home order results in a marked reduction in dockless vehicle deployment. Two operators temporarily suspended service, and overall trips for all operators declined. In response to the COVID-19 pandemic, one operator began deploying vehicles with self-cleaning technology on its brake levers and handlebars.

One-Year Pilot Program Evaluation

In July 2019, LADOT executed an agreement with Nelson\Nygaard to evaluate the Pilot Program. With LADOT, they developed an evaluation methodology, a performance monitoring program, a data management plan, a framework for compliance evaluation and assessed programmatic equity. Nelson\Nygaard analyzed operator behavior and responses, ridership and utilization trends, and effectiveness of LADOT initiatives and Program regulations.

Figure 1: Key Statistics from One-Year Pilot Program

3.7 Highest trips per vehicle per day in a month (April 2019)

1.7 Lowest trips per vehicle per day in a month (June 2019)

4.5 Highest average monthly deployment* per 1,000 residents (October 2019)

2.3 Lowest average monthly deployment per 1,000 residents (April 2019)

54% of rides originated or ended in a non-DAC

44% of rides originated or ended in a non-San Fernando Valley DAC

2% of rides originated or ended in a San Fernando Valley DAC

10.3 million Total ridership

17,746 vehicles Highest average monthly deployment (October 2019)

9,056 vehicles Lowest average monthly deployment (April 2019)

44% of riders Drive less often

*   Deployment within the context of this report is defined as the average vehicle state of all vehicles in the public-right-of-way for a given month, regardless of how the vehicle ended up in the right-of-way (e.g. provider drop-off or user trip end, etc.).

Nelson/Nygaard measured the Program's performance against four core objectives: Safety, Equity, Access, and Quality of Life. Key takeaways from the One-year Evaluation Report are below. See Attachment 3 for the detailed Program evaluation.

> *Expanded Mobility*: Dockless vehicles served as a valuable mobility option for Angelenos. However, the program did not effectively serve communities with the greatest need for accessible and affordable mobility options, despite incentivized deployment in disadvantaged communities. Incentives such as an increased fleet cap and reduced fees per device were insufficient on their own to induce operators to deploy vehicles evenly across the City or provide consistent service in disadvantaged communities. In addition, few riders were unaware of discounted equity plan options. Riders primarily used electric scooters and bikes for commute and recreation trips. Survey data revealed dockless vehicle trips replaced trips from other modes including driving. Thus, the permanent program should find additional tools to address the financial burdens, safety, access concerns, and geographic and technological barriers faced by vulnerable populations (i.e. older adults, people with disabilities, and low-income Households).

Responsible Data Use: LADOT's policy, planning, regulatory, and operational functions are the foundations of right-of-way stewardship. Without data and technology to enable movement and enforce rules, LADOT would not fulfill its stewardship responsibilities. LADOT has taken extensive measures to bolster cybersecurity and rider privacy. We worked with data privacy experts to help inform how the Program protected data privacy and received recommendations for improvement. The agency drafted Data Privacy Principles[1] and operationalized key actions related to these principles, per City Council directions.

Efficient Management and Enforcement: LADOT worked with ITA to support Dockless Vehicle Operator integration with MyLA311, empowering Angelenos to share concerns in real time. LADOT used this tool to monitor transportation-related service requests and hold operators accountable to keep the public right-of-way clear. LADOT also developed and used the Mobility Data Specification (MDS) to evaluate operator compliance and the effectiveness of the rules and guidelines to achieve program outcomes. LADOT developed the MDS in open-source which allowed municipalities from around the world to see how LADOT was managing the public right of way. Today over 90 cities use MDS. Due to high municipal interest, LADOT led in creating the Open Mobility Foundation, an open-source, cross-sector foundation that is led by cities and governs MDS.

Innovation and Testing: The Pilot Program allowed LADOT to better understand how to permit, manage, and regulate app-enabled mobility services. LADOT piloted both physical and digital policy tools in select locations to address clutter and oversaturation. These tools include drop zones in Downtown and Venice, Special Operations Zones (SOZs), and geofences.

Data Privacy and Core Advisory Board (CAB)

To ensure the privacy of dockless mobility users and to protect the security of the vehicle data it manages, LADOT published its Data Protection Principles that expand on the City's existing data handling guidelines. The Principles outline standards for classifying, handling, and sharing mobility data to ensure mobility data provided via MDS is appropriately protected, never monetized, and not available to any branch of law enforcement without a warrant, subpoena, or other legal process. Each year, LADOT will publish a transparency report detailing entities that have requested and received data. These principles ensure that we keep mobility data safe and confidential. LADOT worked with data privacy experts who provided recommendations on how to improve upon the Program's data privacy policies. Following their guidance, the Department is adding further specificity to those principles to adapt and improve its policies. A more detailed description of our data privacy efforts to date can be found in a report presented to Council on June 19, 2020 (CF #19-1355).

As part of the Program evaluation, LADOT convened an advisory board made up of various community stakeholders (see Table 2) to provide specific feedback on the program evaluation and related data required to manage the Program. The board influenced several recommendations in this report and also provided significant feedback on equity, investment, and transparency, for the dockless program and throughout the department's operations. LADOT will look to establish an ongoing CAB to support not just work around dockless, but broader mobility initiatives as well.

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[1]City Council approved endorsement of the Data Privacy Principles on November 27, 2019.

Table 2: Core Advisory Board Composition

Organization / Affiliation	CAB Member
AARP	Stephanie Ramirez
Natural Resources Defense Council	Damon Nagami
Pacoima Beautiful	Veronica Padilla
Prevention Institute	Manal Aboelata
Southern California Resource Services for Independent Living (SRCS-IL)	Hector Ochoa
South Los Angeles Transit Empowerment Zone (Slate-Z)	Effie Turnbull Sanders*
Vera Institute of Justice	Stacey Strongarone**

*Ms. Turnbull Sanders was not able to attend any meetings and left the CAB due to scheduling conflicts
**Ms Strongarone was only able to attend one meeting.

The attached updated Rules and Guidelines address these lessons learned, and include new enforcement mechanisms and requirements to ensure equitable access and safe deployment of micromobility services in the Dockless On-Demand Mobility Program moving forward.

Dockless On-Demand Mobility Program: Proposed Objectives and Recommendations

Based on evaluation of the one-year Pilot Program, LADOT identified a revised set of objectives for the Dockless On-Demand Mobility Program moving forward. These objectives are as follows:

- *Healthy, transparent, and equitable*: Give Angelenos more accessible transportation choices, empower impacted communities to participate in transparent decision making, reduce racial and social inequities, and improve mental and physical health outcomes.

- *Safety-focused*: Imbed neighborhood needs in permit requirements and operator accountability metrics.

- *Clean and resilient*: Give individuals options to drive less and use clean transportation options for short trips.

- *Open marketplace*: Create local jobs. Foster competition and innovation in an open marketplace and regulate to reward good actors.

LADOT will annually review, measure, and evaluate the Dockless On-Demand Mobility Program's success in fulfilling these objectives as detailed below.

Table 3: Dockless On-Demand Mobility Program Objectives and Goals

Program Objective	Outcomes	Goal	What are we measuring?	How are we measuring?
Healthy, Transparent and Equitable	Improved Vehicle Deployment in Equity Zones	Providers are required to deploy 5% of all vehicles in Equity Zones	Number of Vehicles Deployed on a daily Basis	MDS and Physical Audit
	Improved Access in Equity Zones / unused vehicles deployed in Equity Zones	Increase trips taken in Equity Zones with users traveling short distances on dockless vehicles	Rides Per Vehicle Per Day starting or ending in Equity Zones	MDS
	More low-income Users able to access system	Increase enrollment in low-income payment plans and ensure meaningful access to vehicles for low-income users through required community outreach and education.	Number of low-income users	MDS, physical audit and rider surveys
Safety-Focused	Provide the public a mobility option that feels safe and supports the user experience	Decrease the number of injuries and collisions year over year.	Collision and Injury Statistics	Data collected from the LAPD/LAFD
	Ensure defective or unsafe vehicles are not deployed and/or quickly removed from right-of-way	Hold operators accountable for defective vehicles. Non-compliance results in operators subject to fines.	Vehicle Safety Record	Compliance Audits
	Ensure vehicles are not blocking access to the sidewalk or curb ramps.	Hold operators accountable for maintaining accessibility for wheelchair users and pedestrians.Non-compliance results in operators subject to fines.	Review 311 Compliance records for sidewalk and curb ramp blocking complaints	311, MDS, Physical Audits
Clean and Resilient	A sustainable mobility option becomes an efficient and effective mode	Move short distance trips from single occupancy cars or rideshare/taxis to zero emission scooters to reduce emissions.	Studies to review mode shift (i.e Private auto/Taxi/TNC to dockless Zero Emission Vehicle)	Consultant Study/Surveys
Open MarketPlace	Job Creation	Ensure operators contribute to the community by increasing the number of local jobs	Number of new positions with benefits including number of local hires	Self reporting and surveys
	Working with local communities	Ensure operators conduct community outreach to educate communities about mobility opportunities and provide services that reflect stakeholder needs.	Partnerships with LADOT approved CBOs	Partnerships overseen by LADOT

Note: Additional detail provided on metrics and Program evaluation can be found in the Draft Rules and Guidelines (Attachment 4).

Healthy, Transparent, and Equitable

Health

Under Mayor's Garcetti's Sustainability Plan, LADOT committed to healthy outcomes and reducing greenhouse emissions by increasing shared mobility trips. By leveraging innovation brought forth by the private sector, LADOT substantially increased the number of shared trips on scooters and e-bikes through the Program. Additionally, LADOT incentivized deployment in disadvantaged communities that were not only characterized as low-income communities, but also vulnerable geographic areas due to disproportionate exposure to greenhouse gas emissions.

As indicated in rider surveys collected during the Pilot Program, nearly a third of micromobility trips replaced high-emissions, single-occupant car trips or ridehail trips. Using these survey results and an estimated value of 202 g/mi of life cycle CO_2 emissions for each electric scooter mile traveled[2], the manufacturing, charging, and rebalancing of dockless vehicles emitted approximately 1,707 metric tons of CO_2, a savings of approximately 95 metric tons of CO_2 (5%) over car trips. LADOT will continue to calculate emissions reductions and look at opportunities to further incentivize shared mobility trips and maximize Program impacts citywide.

Transparency

Community engagement efforts to date focused on communities with high dockless use and deployment. As a result, many communities that could have reaped the greatest benefits from dockless mobility in their neighborhoods faced barriers to adopting micromobility and were excluded from the decision-making process. In order to address this issue, LADOT will dedicate funding and resources to build a community engagement program that prioritizes outreach with populations experiencing limited mobility. Engagement will be a requirement for all permitted operators. Specifically, LADOT will implement the following actions:

- Set aside $150,000 in Program generated funds to support Community Based Organizations (CBOs) to lead outreach efforts.
- Require operators to contract with CBOs to deliver outreach and increase registration of low-income plan membership.
- Require operators to include specific strategies for how they will engage older adults and disabled community members.
- Require operators to provide customer service, outreach, and advertising materials in multiple languages including but not limited to Spanish.
- Publish dockless mobility data sets to the Open Data Portal and enable communities to connect and work with the data.

Equity

LADOT will use MDS to identify geographic disparities of vehicle availability, income barriers to using shared mobility devices, and mobility needs to ensure that operators deploy devices in specific neighborhoods and achieve more equitable access to the program moving forward. The updated Rules and Guidelines include several changes intended to meet specific equity outcomes connected to two

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[2] https://iopscience.iop.org/article/10.1088/1748-9326/ab2da8

types of stakeholders: 1) existing stakeholders who cannot access the system due lack of vehicles in their community or geographic equity, and 2) existing stakeholders who cannot access the system due to costs or income equity.

Geographic Equity

During the pilot phase of the Program, LADOT incentivized deployment in Disadvantaged Communities (DAC) by lowering permitting costs associated with vehicles deployed in those areas. Operators deployed in DACs that were adjacent to high-ridership areas and did not deploy in some DACs at all, most notably San Fernando Valley. These incentives did not achieve ridership or deployment goals. Starting in the second year of the program, LADOT will identify equity zones by considering a set of more complex factors including mobility needs/availability, displacement risks, and racial equity, rather than DACs determined solely by demographics.

LADOT will consider two types of zones: Mobility Equity Zone (MEZ) and Mobility Disadvantaged Zone (MDZ). MEZs are transportation disadvantaged areas and areas that meet the Hardship Index developed by the Nelson A. Rockefeller Institute of Government[3] as a filter for socio-demographic vulnerability. "Transportation disadvantaged" refers to areas with transportation deficiencies including:

- *Lack of access to modal options*: areas that lack access to transit, bike infrastructure, or shared mobility infrastructure. Access was defined as proximity to rail and bus transit stops, bikeways (separated, protected, or painted lanes), bikeshare stations, and BlueLA stations;
- *Low travel quality*: based on frequency of transit, level of traffic stress on major streets, and generalized travel cost based on travel time; and
- *Crash safety risks*: based on number of fatal and serious injury crashes.

MDZs are areas that are transportation disadvantaged but do not meet the Hardship Index. A map of MEZ and MDZ areas are included in the Rules and Guidelines (Attachment 4).

The base number of vehicles an operator may deploy on the right-of-way will be limited to 3,500 vehicles throughout the entire City. Increases of the fleet beyond 3,500 vehicles will be based on Equity Zone deployment and other factors including satisfactory compliance scores and technology innovations. which will LADOT staff will monitor on a daily basis. During the pilot, LADOT observed that operators deployed heavily in three areas of the city that represented high numbers of rides: Venice, Downtown Los Angeles, and Hollywood. Operators that choose to deploy any of their vehicles in desirable, high-use areas must deploy a percentage of their fleet in MEZ and MDZs based on the formula below.

- For operators who want to deploy in the Venice area, five percent (5%) of their total fleet must be deployed in MEZs.
- For operators who choose to deploy in Downtown Los Angeles and/or Hollywood, five percent (5%) of their total fleet must be deployed in MDZs.

LADOT will evaluate Equity Zone ridership to review and approve fleet increases throughout the permit year. For example, if an operator demonstrates one trip per vehicle per day in the MEZs, they may add up to 2,000 additional to their fleet. If an operator has 1.5 trips per vehicle per day in the MDZs, they

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[3] https://rockinst.org/issue-area/hardship-americas-cities-suburbs/

may add up to 1,500 additional vehicles to their fleet. LADOT will periodically review this incentive and make adjustments to achieve greater equity outcomes.

Mobility Equity Zone Price Capping

LADOT aims to make devices deployed in Equity Zones both available and affordable. To do this, LADOT updated the program rules and guidelines to set a price maximum for rides beginning and ending in Equity Zones. The Department recommends a $1.25 per trip cap for trips that begin or end in MEZs, and a $1.75 per trip cap for trips in MDZs. These price caps mimic current transit fares and provide individuals living or working in Equity Zones greater access to another mode of transportation for short distance trips. This recommendation is included in the updated Rules and Guidelines, however, implementation requires technical work from both LADOT and permitted operators to ensure auditability to be completed by Spring 2021.

Income Equity: Access to Services Considering Financial Barriers

LADOT will continue to require operators to provide more options for low-income users to access dockless vehicles. Operators must provide discounted pricing options, enable cash payment capabilities, and provide their service to users without smartphones. LADOT will measure the continuation of this requirement combined with Equity Zone deployment requirements and corresponding fleet expansion incentives to gauge how the Program serves low-income communities.

Safety-focused

Safety is an important feature of the Program. The following topics contribute to renewed efforts to ensure the dockless program continues to remain focused on the safety of all users of the public right of way.

Public Safety

Prioritizing public safety is a critical part of the Program. Currently, multiple City departments play roles in the management, enforcement, and reporting of public safety-related components of the Program. LADOT created "no sidewalk riding" signs, developed parking infrastructure, deployed education campaigns regarding micromobility use, and developed infrastructure with the Information Technology Agency (ITA) to streamline reporting safety concerns through 311 from constituents. Additionally, the Los Angeles Police Department (LAPD) reports regularly on traffic collisions involving and citations issued to micromobility riders. The Los Angeles Fire Department (LAFD) tracks injury incidents involving micromobility devices.

In addition to continuing with these initiatives, LADOT recommends additional actions to address public safety for Year Two of the Program:

- LADOT will prepare regular reports related to collision and injury statistics to the Transportation Commission.
- LADOT For-Hire team will monitor vehicle equipment by reviewing 311 compliance records and gathering information from field audits.

- LADOT will coordinate closely with LAPD and meet on an as-needed basis to ensure sidewalk riding enforcement and related educational programs are delivering results aligned with programmatic goals.
- All operators must include Lock-to devices on their vehicles.
- LADOT will conduct a rider safety education campaign.
- LADOT will work with ITA to make integration improvements to 311 Service Requests and MyLA311.

LADOT considered options to prevent minors from accessing and riding dockless vehicles including monthly or quarterly resubmission of driver's license information by the account holder/rider. After review, LADOT determined that this would not materially prevent a minor from using an adult's account to ride; would also open the City to liability for conduct by private individuals; and would represent an unnecessary invasion of privacy given its limited effectiveness in reducing riding by minors.

Fleet Size and Vehicle Cap

Fleet size is a critical safety component of the dockless program. When too many dockless vehicles crowd the public right of way, travel pathways can become unsafe but too few dockless vehicles reduced the healthy competition that exists in the Los Angeles market and represents an intrusion into the marketplace by regulators that is not justified by outcomes. In an effort to prioritize safety while allowing the market to determine use, LADOT allowed for a fleet cap of 10,500 vehicles per operator during the Pilot Program. Only one operator requested authority to operate the maximum number of vehicles. In fact, LADOT observed operators deploying no more than 6,000 vehicles at any given time.

Based on analysis of ridership throughout the pilot, as well as factors related to saturation, the updated Rules and Guidelines set a fleet cap of 3,500 vehicles per operator, with the ability to increase if an operator extends their services to Equity Zones. LADOT will periodically review any increase beyond the 3,500 vehicle cap to determine if the deployment matches the ridership and mobility outcomes we identified as well as whether the operators are investing in fleet management to ensure that the vehicles are in safe working condition and not impeding sidewalk access. Below is a sample scenario of how an operator could receive a fleet increase based on their performance.

Table 4: Sample Operator Fleet Increase Metrics

Operator Status and Behavior	Citywide Fleet Size	Fleet Increase Performance Metric	Review Period
Initial Application	3,500	NA	NA
Mobility Equity Zone Performance Increase	Up to 2,000 additional vehicles	1.75 trips per vehicle per day in Mobility Equity Zones	Quarterly

Mobility Disadvantaged Zone Performance Increase	Up to 1,500 additional vehicles	1 trip per vehicle per day in Mobility Disadvantaged Zones	Quarterly
Satisfactory Compliance Score	Up to 500 additional vehicles	Fewer than 50 points assessed against Operator during the permit year as defined by the enforcement and compliance fee schedule.	Quarterly
Programmatic or Technological Innovation	Up to 500 additional vehicles	Sidewalk riding technology, providing helmets for all trips, other innovations that improve the Program	Quarterly

Micromobility Parking, Bike Lanes, Geofences, and Special Operations Zones

In order to better manage the public right-of-way and promote safety, LADOT will develop and implement a Micromobility Parking Program with a toolkit to address specific community concerns. The toolkit will include standards for the following: 1) Special Operation Zones; 2) a Standard Plan for micromobility parking including both on-street and off-street; 3) installing inverted U-Racks; and 4) installing bicycle corrals.

The Micromobility Parking Program will provide key strategies to address several concerns including: oversaturation, improperly parked vehicles, lack of micromobility parking, restricting parking, and other issues that may arise over time. Additionally, LADOT will leverage MDS, MyLA311, and existing bicycle infrastructure data to identify high use corridors and parking needs. The Department will use its digital tools to take a data-driven approach to address parking infrastructure needs and meet the demands of this evolving technology. Currently, there are over 6,000 inverted U-racks, 17 bicycle corrals, and 72 drop zones installed citywide within commercial corridors available to micromobility riders to use. First, LADOT will conduct a parking needs assessment in the Fall 2020 to identify neighborhoods with the highest activity. From this assessment, LADOT will begin implementing treatments as needed beginning in Winter 2020.

During the Pilot Program, LADOT encumbered $2 million in permit fees to make safety improvements to highly trafficked corridors, including improving active transportation infrastructure. LADOT observed the highest ridership Downtown on 7th Street and Figueroa Street, with each corridor experiencing 5,000-7,000 trips per month. For 7th Street, the Department coordinated community outreach and worked with Public Works Bureau of Street Services and Bureau of Engineering to resurface 7th Street and install a new protected bike lane. The project was installed in May 2020 and cost approximately $230,000. The Department has also scoped approximately $500,000 to extend the MyFig Protected Bike Lane project north to 2nd Street. This work is scheduled to be completed in Fall 2020. Moving forward, LADOT will continue to invest permit fees in safety improvements on high ridership corridors that provide equitable mobility benefits.

Per Council direction, LADOT continues to assess the feasibility of gyroscope technology. While the Pilot Program rules and guidelines did not require gyroscope technology, some operators opted to install it to track if vehicles are tipped over in the right-of-way. However, both LADOT and operators continue to

find gyroscope technology challenging due to inconsistent sensors, unreliable data accuracy, and a risk that data could be manipulated by the operator. LADOT recommends further assessing this technology to solve the issues mentioned above and improve its existing enforcement efforts, before determining if gyroscope technology should be required to ensure rides are not ended abruptly when vehicles are not upright.

LADOT also updated the program Rules and Guidelines to include phased-in "lock-to" requirement to reduce vehicle tipping and provide a clear path for non-riders accessing the sidewalk. This will require all operators to install lock-to equipment on all dockless vehicles to enable them to be locked to nearby infrastructure by March 1, 2021. Although LADOT expects all micromobility devices to be lock-to enabled, the lack of bicycle infrastructure may result in an imbalance in available lock-to locations across different areas while installing the necessary infrastructure to demand.

LADOT permitted over 36,000 devices in the Pilot Program. To manage oversaturation, reduce sidewalk clutter, protect restricted areas and events, and ensure rider safety, LADOT implemented geographic no-ride zones or geofences, and created Special Operations Zones (SOZs). During the Pilot Program these policies focused on addressing areas of the city with the highest deployment and ridership or geographic locations where riding was restricted either by law or for safety concerns.

There are currently geofences for the Oceanfront Walk and beach bike path as well as around the Venice Canals and Hollywood Walk of Fame. These SOZs in Venice and Hollywood use geofencing and parking requirements to prevent vehicle oversaturation, and established specific deployment and rebalancing criteria for operations within that zone. The Walk of Fame area geofence requires Operators to avoid deploying vehicles in the area and does not allow customers to end trips within that zone. LADOT attempted to limit the Hollywood geofence to the sidewalk areas of the Walk of Fame, but currently available technology does not allow that level of specificity.

In establishing geofences and SOZs in specific areas, LADOT focused on harm to the community, safety, and protection of historical monuments while still ensuring access and availability to multiple mobility options for Angelenos. For this reason, LADOT will continue to identify specific locations for geofencing and SOZs based on need, and does not recommend district-wide geofences that restrict access to a mobility option for a substantial number of Angelenos over a very large geographic area.

LADOT will continue to implement three kinds of geofences:

- **Emergency Geofences**: These are typically requested by City departments for public safety reasons such as streets being closed to the public for safety reasons, or if there is a risk to the rider's safety. These geofences typically begin with less than 72 hours notice and can be done to manage a fire or other disaster zone. LADOT is the only agency that can implement a required geofence, following internal protocols used for other emergency management.
- **Short Term Geofences**: This geofence is intended for limited special events, street closures for short term events, and street closures for construction activity. Short term geofences expire in one year or less.
- **Special Operation Zone**: These zones typically include a geofence as well as other operational policy requirements. They are often of a longer duration, or even an indefinite time period, should be reviewed at least annually, and often serve a long-term purpose to change user or operator behavior in the community.

Clean and Resilient

The COVID-19 pandemic made clear that crisis and natural disasters can exacerbate existing deep inequities in communities across the City. Transit ridership fell substantially from the onset of the pandemic, ranging from 50 to 90 percent. LADOT saw the same trend with availability of dockless devices by private companies. Several operators dramatically reduced or ceased service. For now, LADOT will continue to observe current trends and continue communication with peer cities to engage in best practices to strengthen all transportation modes, including micromobility. LADOT will also work with the City's Chief Resiliency Officer to explore ways to support the City's Resiliency Plan goals of strengthening neighborhoods. Dockless devices have not been associated with any clusters or outbreaks of COVID-19 and have not been deemed by the CDC or any other public health organization to pose a risk for outbreak or exposure. In fact, the continued use of both these devices and Metro's municipal bikeshare program point to an ongoing need for single-person transportation as an essential service to compliment public transit, particularly for essential workers.

Open Marketplace

Job Creation

During the pilot, LADOT asked operators to develop community outreach plans. In those plans, LADOT asked operators to consider lowering the cost for low-income riders in underserved communities. Furthermore, operators had to provide education, marketing, and engagement to the community describing the lower cost options for their services and engage with the community as a whole. While operators submitted community engagement plans, LADOT did not enforce adherence to these plans. Lowering the cost of operating devices by reducing the per vehicle fee in underserved areas did not increase trips in those areas. Moving forward, LADOT hopes to increase the community benefits of dockless mobility in a number of ways including by supporting and promoting the creation of local jobs.

As dockless operators continue to add vehicles to Los Angeles' right-of-way, LADOT has an opportunity through its permitting authority to require operators to partner directly with CBOs to work within designated Equity Zones on outreach, improving ridership and deployment, and other service-related functions. This could increase the availability of vehicles in these zones, and also provide opportunities to work with organizations on existing job creation programs or establishing new ones. LADOT will also explore options to use permit fees to fund service and maintenance augmentation through third-party contractors such as the Conservation Corps. This would create jobs that could assist LADOT with vehicle removal, rebalancing, and potential disposal or recycling of vehicles. The Department plans to implement the following strategies to encourage job creation:

- Identify a portion of the permit fees to fund CBOs that work within Equity Zones to support their work and that would provide a consistent funding stream for organizations to hire full time staff, as appropriate
- Identify a portion of permit fees to fund service and maintenance augmentation through third-party contractors such as the Conservation Corps or other CBOs and partners identified by LADOT.

LADOT will review these initiatives on a semi-annual basis with the CAB or other independent body to assess the benefits of this program, and adjust accordingly.

LADOT recommends retaining existing insurance requirements, $5 million per incident, but will continue to work with Risk Management and the City Attorney's office to determine if this amount is the appropriate level of insurance for dockless Operators based on claims and changes to the program. This effort will hopefully retain jobs in the operator companies themselves by ensuring the costs to operate in Los Angeles are reasonable and feasible.

Dockless On-Demand Mobility Program: Compliance and Enforcement

The Pilot Program intended to allow the market to dictate operator behavior, and relied on fleet size reduction and permit suspension to enforce compliance. Based on the one-year evaluation, LADOT determined the program requires a more active approach to manage operator accountability. The updated Rules and Guidelines place a greater emphasis on compliance and include a scalable performance and fee structure to ensure operators have both clear guidance and clear consequences for noncompliance.

Due to the complexity and high volume of trips and devices enabled by micromobility, as well as new emerging modes, operators must be compliant in order to optimize the use of available resources. The LADOT compliance team will continue to rely on technology to help manage its enforcement needs, as staff resources are limited.

LADOT will monitor and enforce operators' performance in three categories:

> *Technical compliance*: LADOT will confirm and verify compliance with MDS requirements for every company permitted to operate in the City. Permitted companies must maintain compliance for the duration of their permit. LADOT will suspend and/or revoke operator permits for willful non-compliance.

> *Operational compliance*: All On-Demand Mobility operators are responsible for the safety and maintenance of their vehicles. Operators are also responsible for maintaining up-to-date insurance documentation and must comply with all LADOT policies.

> *Policy Compliance*: An important component of operational compliance is adherence to digital policies created by LADOT and communicated to operators using MDS. Policy violations that will be measured by MDS include; vehicles not obeying the speed limit during a trip in geofenced zones, vehicles deployed in an SOZ that exceeds the number of vehicles allowed to be deployed there, or vehicles locked by riders in geofenced zones where that action is prohibited.

LADOT will use a combination of MDS and in-the-field investigation to enforce compliance in these categories.

There are four types of violations: Minor, Major, Safety, and Technical. Each violation will tally a point total commensurate with the severity of the incident. For example, leaving a vehicle with a dead battery in the right-of-way is a minor violation (1 point each), blocking wheelchair ramps and deploying more vehicles than allowed in an SOZ are major violations (10 pts each), and severe/safety violations such as failing to adhere to geofences that prohibit riding or deploying vehicles with broken handlebars result in 25 points per incident.

LADOT will use this point total to measure permitted operators' performance and determine fines related to lack of compliance. The Department will measure points and notify the operators each

calendar month of their status. A detailed breakdown of the point system is included in the Rules & Guidelines (Attachment 4).

If an operator corrects a violation, or removes the violating vehicle within one hour for safety violations and within two hours for non-safety violations, no points will accumulate for that particular violation. If the operator does not correct the violation, LADOT will issue points. LADOT will treat points accumulated during the permit year as follows:

Table 5: Program Point Thresholds

Points Accumulated During Permit Year	Fine/Penalty	Percent of Fleet Suspended and Suspension Time
50	$25,000	10% of Fleet for Seven Days
100	$50,000	50% of Fleet for Ten Days
150	$75,000	100% of Fleet for 30 Days
200	$100,000	Potential Permit Revocation

After each permit year, the point totals will start anew. Operators with the fewest points cmay qualify for advantages, including an increased number of vehicles permitted, permit fee discounts, or increased access to deploy in certain high use areas, while poorer performers may be excluded from those benefits.

All fines, including those for insurance and non-indemnity violations, are appealable. However, it is important to note that lack of insurance and continued non-compliance with MDS or other technical issues are causes for suspension and/or revocation. Details on the appeals process is also included in the Rules and Guidelines (Attachment 4).

Dockless On-Demand Mobility Program: Program Funding

Annual baseline funding of $2,982,749 is required to support general program operations, which includes City staff direct and indirect costs, contractual services, training, material supplies, as-needed temporary hiring, field enforcement activities, and infrastructure investment.
Expenditure Plan

The annual expenditure plan is derived from the annual Program funding requirements. The expenses and costs described below are estimates based on the program costs derived from the Pilot Program. Estimated program expenditures are displayed in Table 6 below.

Table 6: Program Expenditures

Expense	Cost
Salaries (Direct + Indirect Costs)	$1,603,264
Contractual Services	$655,000
Field Enforcement	$295,000
Materials, Equipment, Training, Supplies (Admin)	$64,500
As Needed Hiring/Overtime	$65,000
Community Engagement and Outreach	$150,000
Infrastructure	$151,985
Bike Corral installation (5): $2,721 per corral = $13,605	
Bike racks (50): $1,000 per rack = $50,000	
Drop Zone Installation (90): $982 per drop zone = $88,380	
TOTAL COST	**$2,984,749**

Given the high variability and unpredictability of the 2020 budget due to COVID-19, these estimated expenditures are subject to change and dependent upon staff resources, department priorities, and other factors.

Proposed Fees

Fees administered in the Pilot Program included an up-front permit application fee of $20,000, which covered initial costs to issue permits and manage technical and operational compliance. In conjunction with the application fee, operators paid a one-time per vehicle fee ranging from $39 to $130 depending on whether or not deployment was in a DAC, setting each operator's maximum fleet size for the entire year. The one-year program evaluation found that the per vehicle fee was not successful in incentivizing deployment and trips in DACs and did not provide flexibility to account for changes in the market throughout the permit year.

Based on an analysis of total trips in the pilot year, a scan of peer city pricing models, discussions with the industry, and an understanding of the volatility of the market, the program Rules and Guidelines include the following fee structure:

Up-Front Administration Fee $20,000
Per trip fee $.06 - $.40

LADOT proposes an annual permit administration fee of $20,000 per operator which will cover costs related to permit issuance and technical and operational compliance for the first two months of each permit year. Along with the annual administration fee, LADOT proposes to institute a trip fee for all trips

occurring in Los Angeles, to be billed monthly. This trip fee ranges between $0.06 to $0.40 per trip depending on trip location, with lower trip fees corresponding to trips in MEZs. LADOT determined per-trip fee rates based on the total expenditure plan and cost of administering the Program. This fee will not only incentivize trips taking place in MEZs and MDZs, but will also ensure that high demand areas like SOZs incur higher fees to account for their greater impact on Program administration at LADOT.

MEZs are equity zones with the highest need, but may see high operating costs per trip given the distance of their location from operator hubs. For this reason, MEZs should incur no fee. MDZs are zones that experience barriers to transportation (e.g. infrequent transit service) but are not characterized by socioeconomic factors that indicate additional barriers to transportation access. Therefore MDZ fees will be lower than the base and SOZ fees, and LADOT will incentivize deployment by eliminating per trip fees in MEZs. LADOT will regularly monitor and review the fee structure below to ensure the program provides equitable access.

Table 7: Per Trip Fee Structure

Geography	Applicability	Per Trip Fee*
Base	Trips that begin and end outside of SOZ and MEZ/MDZ	$0.20
SOZ	Trips that begin or end in SOZ	$0.40
MEZ	Trips that begin or end in MEZ	$0.00/ No Cost
MDZ	Trips that begin or end in MDZ	$0.06

*The lower per trip fee will apply for trips that begin in one geography and end in another.

FINANCIAL IMPACT

This is a permit program and all revenues will cover the cost of the Program. Therefore, there is no fiscal impact.
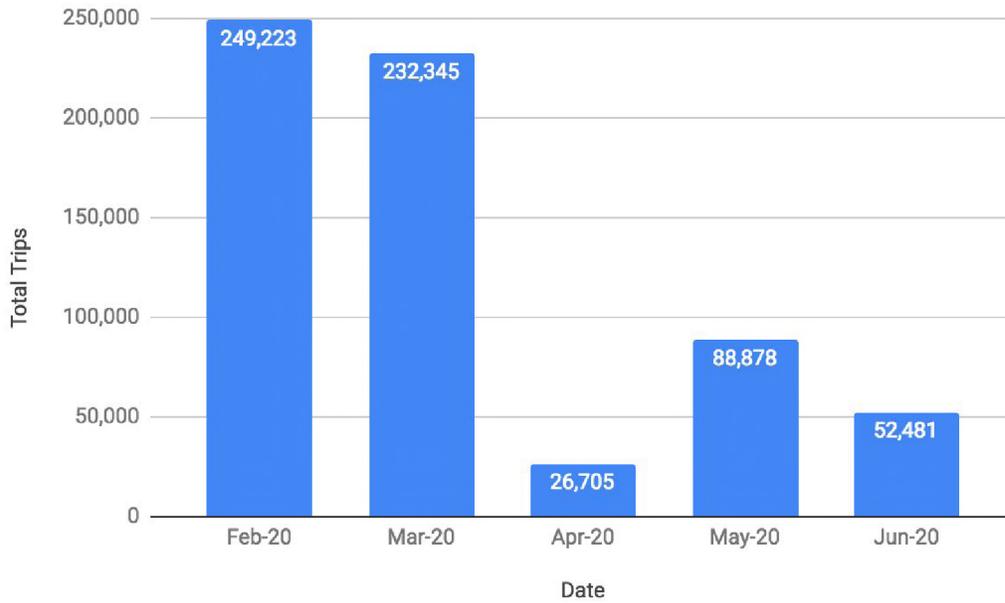
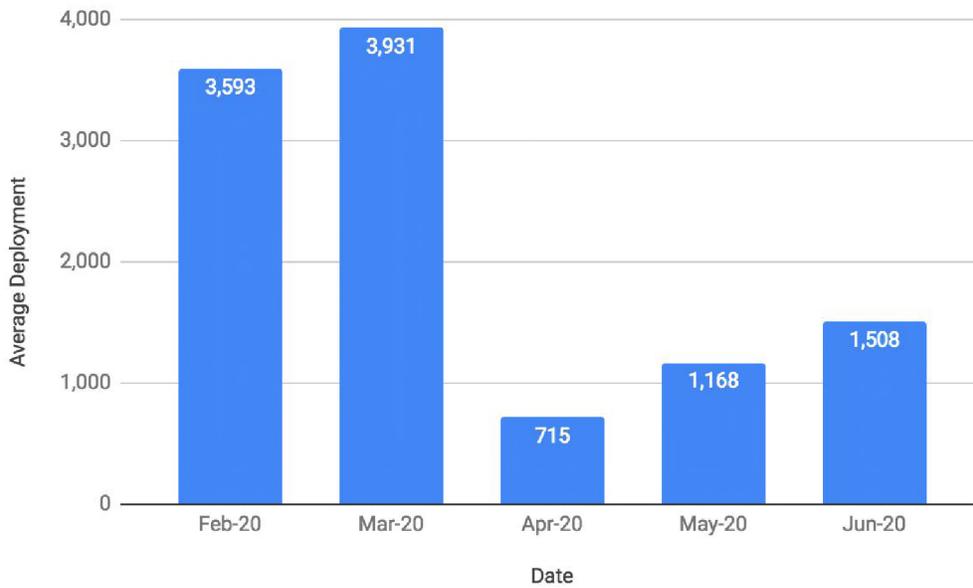**Dockless On-Demand Personal Mobility Pilot Program Statistics Update**

Ridership

From February 15, 2020 through June 15, 2020, LADOT observed 649,632 total trips.

Figure 1: Total Trips Citywide (2/15/2020 - 6/15/2020)

Daily Deployment

Figure 2: Average Daily Deployment Citywide (2/15/2020 - 6/15/2020)

LAFD Incident Reporting

From March 2019 through the week ending March 16, 2020, the Los Angeles Fire Department Emergency Medical Services Bureau reported a total of 347 incidents involving e-scooters.

Table 3: (E-scooter Related Incidents by Quarter)

Quarter	Total Incidents	PTs Transported BLS[1]	PTs Transported ALS[2]	PTs Treated & Not Transported[3]
Q1 (March-May 2019)	60	19	26	15
Q2 (Jun.-Aug. 2019)	112	34	45	33
Q3 (Sep.-Nov. 2019)	97	17	52	28
Q4 (Dec.2019-March 2020)	78	32	21	25
Total	347	102	144	101

PTs Transported BLS[1]= Patients transported via Basic Life Support Ambulance (staffed by EMTs)

PTs Transported ALS[2]=Patients transported via Advanced Life Support Ambulance (staffed by Paramedics)

PTs Treated & Not Transported[3]= Patients Treated by Paramedics or EMTs on scene, but not transported to the hospital by any type of LAFD ambulance

LAPD Reporting

Table 4: Total E-Scooter Traffic Collisions reported by LAPD (1/3/2019-3/15/2020)

LAPD Traffic Division	Number of Collisions
Central	79
West	288
South	9
Valley	31
Total	407

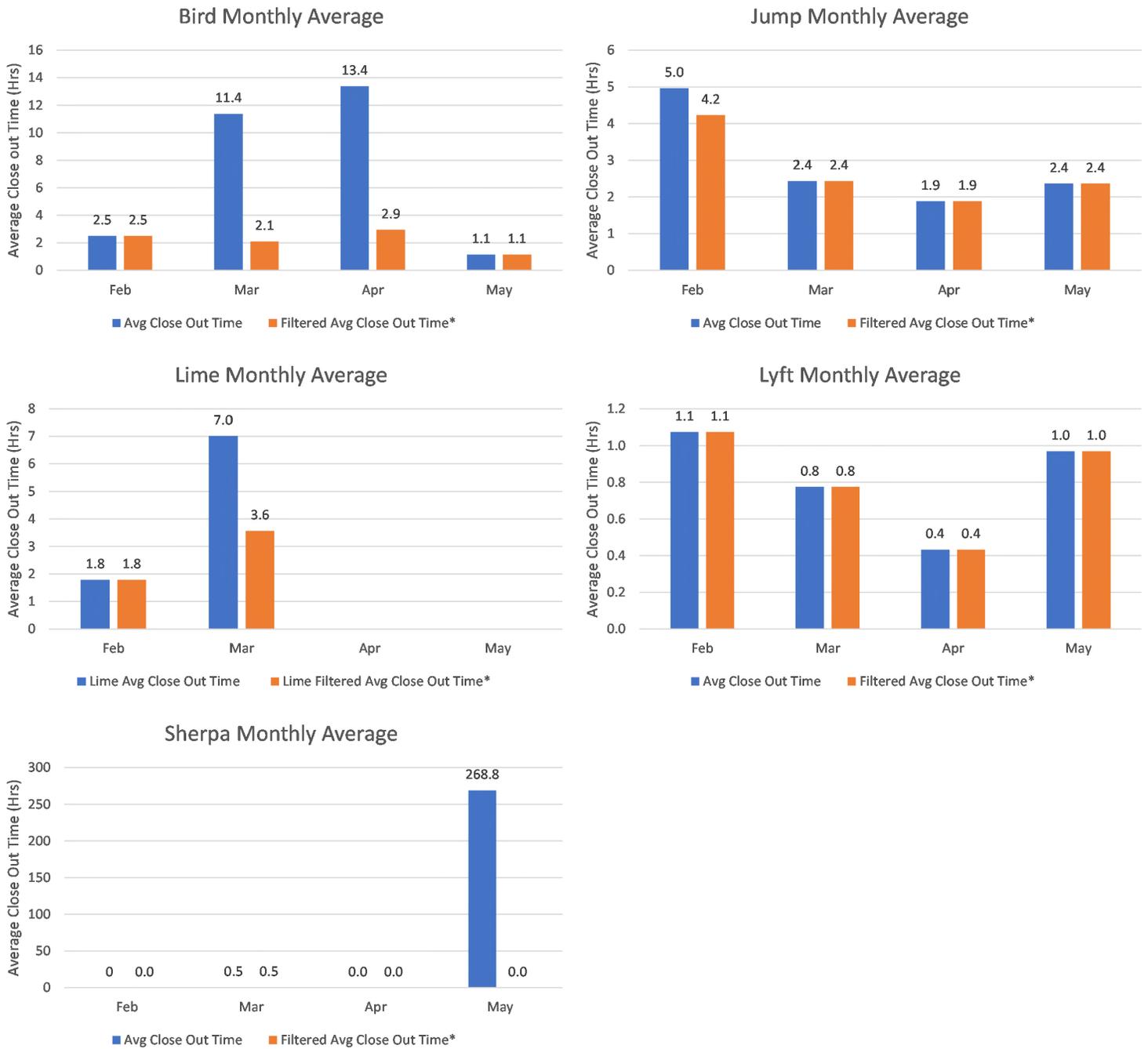**Table 5: Total E-Scooter Traffic Violation Citations Issued by LAPD (All Code Sections, 01/03/2019 - 03/15/2020)**

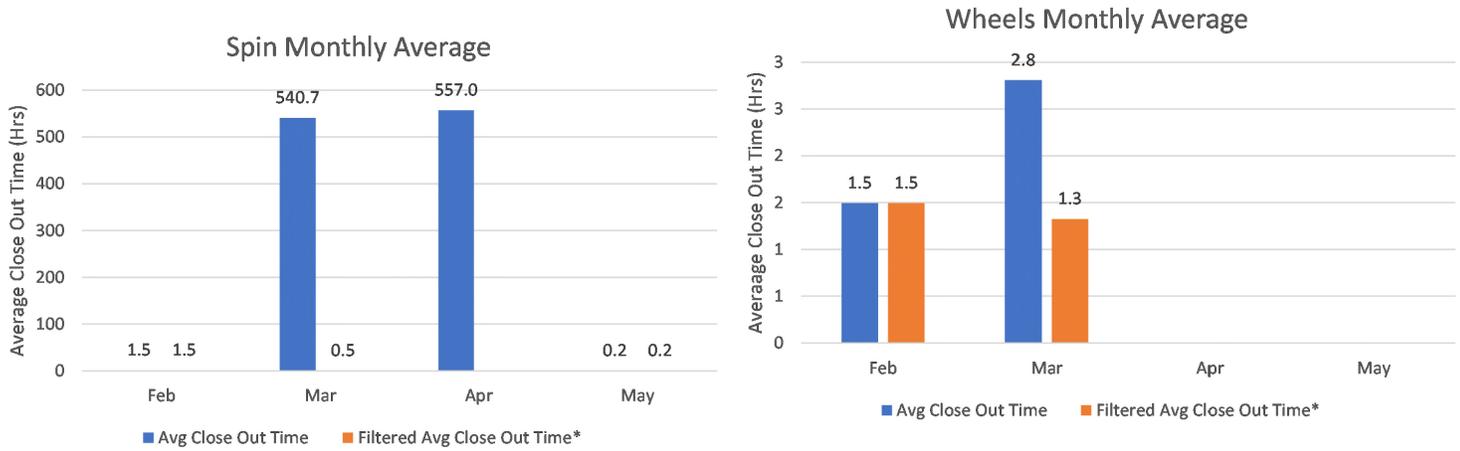| LAPD Traffic Division	Number of Citations
Central	1,033
West	241
South	33
Valley	9
Total	1,316

Table 6: MyLA311 Service Requests by Operator

Operator	Number of Service Requests (2/15/20-5/15/20)	Percent of total
Bird	156	18%
Bolt	1	0%
For-Hire Policy and Enforcement*	15	2%
Jump	243	29%
Lime	191	23%
Lyft	39	5%
Sherpa	9	1%
Spin	31	4%
Transportation Technology	104	12%
Wheels	55	7%
Grand Total	**844**	**100%**

*Previously service requests were routed to the Bureau of Transportation Technology for requests where a constituent reports sidewalk riding or does not know or provide the name of the responsible company. This has been transferred to the For-Hire Policy and Enforcement team.

Figure 7: MyLA311 Service Request Average Close Out time by operator (2/15/20 - 5/15/20)

Bird Monthly Average

Jump Monthly Average

Lime Monthly Average

Lyft Monthly Average

Sherpa Monthly Average

Spin Monthly Average

Wheels Monthly Average

Note: Over the course of the program, operators showed progress in improving their close out times. Some requests may take longer than 24 hours to complete due to technical issues (e.g. operator issues closing Service Request due to integration errors with MyLA311 or pulling Service Requests every 2 hours or longer) or due to the nature of the request (e.g. vehicle in the Venice Canals). These service requests are noted and filtered out of the average. When filtering out requests lasting over 24 hours the average close out trends are generally the same.

Figure 8: MyLA311 Service Requests by Type 2/15/20 - 5/15/20

Service Requests Received by Type
(2/15/20 - 5/15/20)
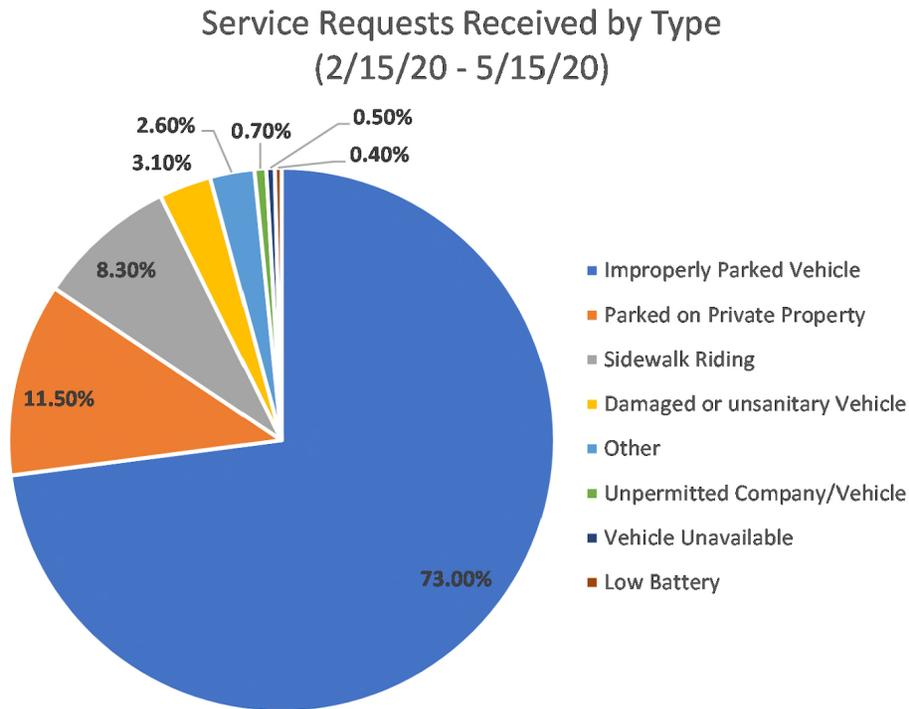
Violation Infraction	SRNumber	percent of Total
Improperly Parked Vehicle	616	73.0%
Parked on Private Property	97	11.5%
Sidewalk Riding	70	8.3%
Damaged or unsanitary Vehicle	26	3.1%
Other*	22	2.6%
Unpermitted Company/Vehicle	6	0.7%
Vehicle Unavailable	4	0.5%
Low Battery	3	0.4%
Grand Total	**844**	**100%**

*Includes requests that a constituent may not know how to categorize or do not fall within other categories (e.g. Vehicle in Venice Canals)

CITY OF LOS ANGELES
CALIFORNIA

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ERIC GARCETTI
MAYOR

April 2, 2020

ATT: Dockless Mobility Operator

Subject: **Updated COVID-19 Response Sanitation Protocols**

Dear Operator,

The Los Angeles Department of Transportation(LADOT) recognizes dockless mobility as a key transportation option, particularly for those who are practicing social distancing in response to the spread of COVID-19 (Coronavirus) in the City.   The LADOT, as the dockless mobility permitting body, has an obligation to protect the health and welfare of riders and the surrounding community.

The LADOT believes that in order to fulfill these obligations, particularly during this time of emergency, certain methods must be done to ensure the safety of the public.

These measures include the following:

- All Providers must ensure that sanitary gloves are worn by all individuals, whether employee or independent contractor, who perform any type of maintenance on the vehicles. This includes individuals who charge and/or deploy and rebalance vehicles.
- All Providers must ensure that its vehicles are sanitized and disinfected prior to each deployment or upon return to the warehouse.
- All Providers must ensure that any vehicle brought to its warehouse is sanitized and disinfected regardless of whether the vehicle was sanitized previously that day.
- All Providers must provide in-house staff with appropriate disinfectants for cleaning frequently touched surfaces and ensure that external stuff also uses appropriate disinfectants for cleaning frequently touched vehicle surfaces.
  - Refer to the Environmental Protection Agency's list of recommended disinfectants
- All Providers must educate staff, whether employee or independent contractor, on how to protect themselves from infection.
- All Providers must educate dockless mobility customers through digital media about vehicle sanitation practices.
- Dockless Providers may also temporarily remove a portion or all of its dockless fleet from circulation during this emergency if it deems such action as necessary. This will not affect the Providers permit as long as all requirements are met when the devices are re-deployed

- All Providers must submit updated sanitation protocols to the LADOT, particularly as it relates to protocols enacted to help prevent the spread of COVID-19.
- Any later updates to a provider's sanitation protocols must be submitted to the LADOT.

The LADOT is aware that many companies have already started using these protocols and is grateful for your proactive approach and service.

These instructions are to help clarify what is required during this critical time, and to inform Providers that a sanitation protocol is now required for all Providers.

The dockless mobility industry is an important part of the transportation matrix in Los Angeles and we know you will do your part to help keep your riders and our communities safe.

Attached are strategies from the Los Angeles County Department of Public Health and the United States Department of Labor to help prevent the spread of COVID-19 .

 If you have any questions , please contact Jose Elias at jose.elias@lacity.org

Sincerely,

Jarvis Murray
For-Hire Policy and Enforcement Administrator

Enclosures:

Los Angeles County Department of Public Health FAQ
OSHA - Guidance for preparing workplaces for COVID-19

LADOT

Year One Snapshot

A Review of the 2019-2020
Dockless Vehicle Pilot Program

JULY 2020
FINAL DRAFT

Acknowledgments

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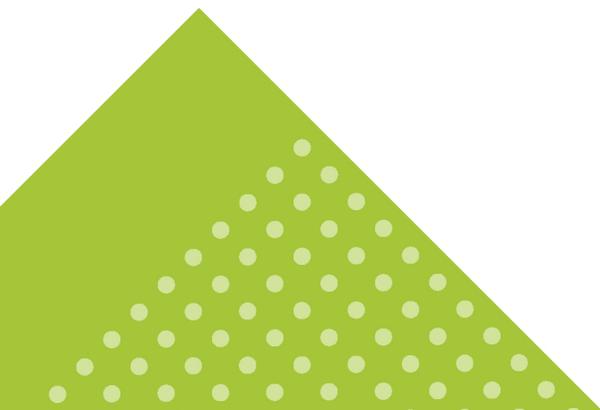### Naomi Iwasaki Consulting

Naomi Iwasaki

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List of Figures

Welcome to the Dockless Vehicle Pilot Program Year One Snapshot.

People in Los Angeles deserve safe and affordable transportation choices to get around the city. Los Angeles is a sprawling metropolis spanning 503 square miles. Its sheer size and geographic variability create challenges for the city's transportation network. The Los Angeles Department of Transportation's (LADOT) Dockless Vehicle Pilot Program aimed to balance the needs of multiple stakeholders across the city: technology companies who wanted to provide a new kind of transportation service; Angelenos who needed ways to get around, people concerned about sidewalk clutter and safety; leaders from low-income communities of color who wanted to ensure equal access to the program; and environmentalists that were both worried about the potential damage to sensitive habitats and excited about a new low-emission way to travel. Our goal was to allow an even playing field for companies to enter the market, while balancing a streamlined approach to regulation with an urgency to resolve complaints. In order to open the market, we had to provide clear assurance that we could monitor a large program with multiple operators, hold them accountable when needed while allowing enough room for thoughtful innovation, testing, and learning.

The Dockless Vehicle Pilot Program Year One Snapshot summarizes LADOT's experience managing dockless shared micromobility services — electric scooters and bikes—between April 2019 and March 2020. During that time frame, Angelenos took a total of 10.3 million trips on electric scooters and bikes to travel to work or school, to access healthcare and childcare services, and to access transit.

This report evaluates the Pilot Program and its eight permitted operators through the lens of safety, equity, access, and the community's quality of life. Making groundbreaking use of dockless vehicle trip data, compliance audit findings, user surveys, and other data sources, this report highlights the key challenges and opportunities related to dockless mobility. Lessons learned from the Pilot Program will inform data privacy and digital management policies and program direction for future shared mobility programs in Los Angeles.

01

Mobility and Technology in Los Angeles

Transportation Technology in Los Angeles

Los Angeles has a rich history of introducing new transportation technologies. From the birth of the Pacific Electric Railway Company's interurban streetcar network to the more recent expansion of shared urban mobility options, Los Angeles has always served as a laboratory for new mobility services and transportation policy innovation.

Los Angeles has fostered one of the most robust transportation technology marketplaces in the U.S. The advancement of pioneering mobility partnerships like the

BlueLA all-electric car sharing, LA Metro Bike Share, and the development of the Mobility Data Specification (MDS) serve as indications of a broader shift in how the Los Angeles Department of Transportation (LADOT) engages with companies. We are testing out models and tools that invite companies to bring new ideas to the city without creating monopolies, vendor lock-in, or black box solutions. This approach empowers LADOT to focus on what we do best: managing, building, and operating streets and sidewalks.

Perhaps more so than any other city in the United States, Los Angeles has unique transportation needs that require diverse mobility solutions. New investments in urban mobility made by LADOT, Metro, and private operators have led to a rich ecosystem of mobility products and services providing meaningful transportation options for Angelenos.

LADOT openly encourages transportation innovations that solve real mobility problems. Instead of taking a passive stance or inundating the market with stifling regulations, LADOT created a sandbox where new mobility services could test their service models. Though operators launched service without permission from the City, LADOT did not jump to remove these operators from the market. LADOT saw this as an opportunity to leverage new technology, while testing new regulatory frameworks and tools to protect the public right-of-way.

The Age of Dockless Mobility

Los Angeles has become a testing ground for new transportation technologies. This began in 2012 with the introduction of ride-hailing services like Uber and Lyft and continued with the launch of shared dockless mobility services, like shared electric scooters, bikes, and other seated small vehicles. What is unique about the current phenomena of shared micromobility is its dockless nature: operators and users are no longer bound to a limited number of docking stations. Instead, vehicles can be deployed, unlocked, ridden, and dropped off anywhere in the city's right-of way.

In November 2017, Lime debuted dockless bikes in Watts and San Pedro and Ofo deployed a small fleet of dockless bikes in Griffith Park. Less than a year later, Bird and Lime released their electric scooters on the streets of Los Angeles without City approval. These unpermitted launches, where operators flood the market before the city establishes regulations, have become a staple for tech companies. With dockless mobility though, they immediately prompted concerns of public safety, accessibility, and right-of-way management. Both small and established operators have followed suit with their own rogue launches in the hopes of entering the market before the City regulates them. To future-proof our program, LADOT positioned its Dockless Vehicle Pilot Program as a comprehensive framework for governing all shared micromobility options, irrespective of mode type and business model.
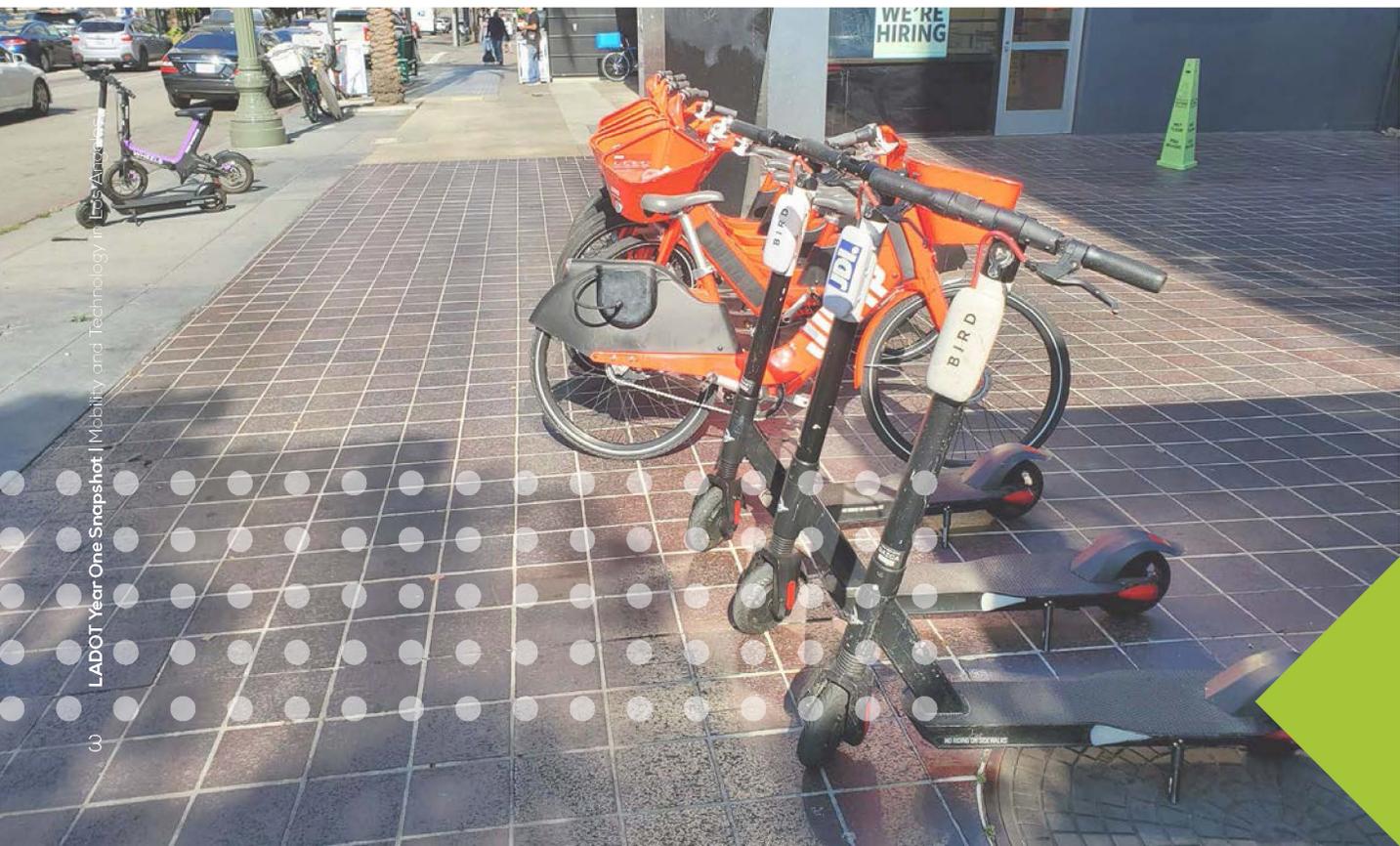
A Business Model Built on Venture Capital

The volatile nature of the dockless micromobility industry reflects the challenges of regulating such a dynamic mobility model. Venture capital (VC) funding rounds are a key to understanding the direction of the mobility market and how operators make decisions. Many startups raise capital through external funding to grow their business. Funding rounds provide outside investors the opportunity to inject cash into a growing company that they believe can provide a significant return on investment in the future.

Figure 1. Operator Funding Rounds (March 2020)

Operator	Funding Round
Bird	Series D
Bolt	Series A
JUMP	Public/Initial Public Offering (IPO) complete; Lime acquired Jump's assets in May 2020
Lime	Series D
Lyft	Public/IPO complete
Sherpa	Subsidiary to Bird
Spin	Series A
Wheels	Series A

While the path for each startup and the timeline for funding varies, operational and business decisions are often tied to attracting more funding and asserting investor confidence. On the surface, a rogue launch is a means to an end—gaining access to a market. However, rogue launches are a signal to VC investors that a city like Los Angeles is open for business. The reliance on VC funding to sustain and scale business operations means operators heavily weigh the priorities of their investors in their decision-making. While these priorities may be at odds with local regulations and public interest objectives, in some cases, they intersect. In an effort to win and retain customers, operators oversaturate sidewalks with devices to ensure they are readily available.

02

The Pilot

Following the rapid influx of unpermitted dockless vehicles in Los Angeles, the Los Angeles City Council unanimously approved a moratorium in March 2018 to temporarily ban dockless vehicles until officials could approve rules governing their use. During this time, LADOT worked to quickly develop new rules and regulations governing the operation of dockless and adaptive vehicles in Los Angeles.

Several months later, the City Council unanimously approved the Dockless On-Demand Personal Mobility Rules & Guidelines (Version 0.1), which provided a regulatory framework for dockless

modes like shared electric bikes and scooters and established requirements for a One-Year Permit Program. LADOT initially administered a 120-day conditional permit followed by a 45-day extension to allow operators time to respond to the new guidelines and submit One-Year Permit Program applications. A total of 11 operators responded, eight of which received permits to operate electric scooters and bikes after the conditional permit period.

Pilot History Timeline

March
City Council unanimously approves moratorium to temporarily ban dockless vehicles.

November
LADOT administers a 120-day Dockless On-Demand Personal Mobility Conditional Permit.

January
Conditional Use Permits are extended 45 days.

2018

September
City Council unanimously approves the Dockless On-Demand Personal Mobility Rules & Guidelines (Version 0.1).

December
One-Year Permit Program application is released.

2019

March
One-year permits are issued

Rather than begin with a permanent permit program, the City opted to create a One-Year Pilot Permit for On-Demand Personal Mobility to test and learn new tools and enforcement mechanisms through a pilot model. The pilot structure allowed LADOT to quickly adapt to the rapidly evolving industry, test different management tools, explore the effect on different communities, and ensure that dockless vehicles aligned with the City's goals. Learnings from the Pilot Program help inform state and local policy, data governance, and mobility management more broadly. LADOT's Dockless Vehicle Pilot Program was comprehensive in its requirements; however, it adopted a degree of flexibility that created opportunities for learning and collaboration with the operators. The program established a marketplace that enables service and innovation and promoted the use of MDS for right-of-way stewardship.

What did LADOT seek to learn?

Through the Dockless Vehicle Pilot Program, LADOT sought to understand dockless, on-demand technology and the implications on mobility, city streets and the people that use them. Each section of this report highlights what LADOT learned throughout the pilot process. Overall, the pilot period enabled LADOT to accomplish the following:

- Understand dynamic and evolving marketplace of private mobility operators

- Better understand public safety, accessibility and equity concerns

- Use dockless trip data to understand mobility trends and track operator performance

- Deploy and test digital tools to manage operations and directly alleviate neighborhood concerns

- Learn from peer cities

April 15
Permitted providers are required to comply to permit requirements.

2020

March
City Council approves six-month permit extension.

June
LADOT in process of updating permit rules and regulations for the next iteration of the permit program.

Vision and Objectives

From its inception, the Dockless Vehicle Pilot Program envisioned that all Angelenos would have access to safe, affordable, and sustainable mobility options that support inclusive communities. This supports LADOT's Transportation 2.0 vision of a mobility system that tackles congestion, enables economic development, provides equitable service, and saves lives. The program was guided by the following objectives:

Safety: Ensure safety of all roadway users, including non-riders.

Equity: Provide people of color with a dignified choice, access to and availability of the service, and a program that mitigates disproportionate impacts of deployment.

Access: Provide sustainable mobility options for residents, employees, and visitors of Los Angeles.

Quality of Life: Ensure that people's quality of life is improved and not inhibited.

Each section of this report is measured against these objectives and indicates whether LADOT's vision for each objective was achieved (✔), partially achieved (◑), or not achieved (○).

Nimble adaptation was a necessary hallmark of the pilot, reflecting the rapidly changing nature of the dockless micromobility industry. LADOT prioritized resource efficiency, leveraging the functionality of MDS (described in detail on page 11) and other management tools to efficiently manage operators in the public right-of-way.

Key Regulations

The Dockless One-Year Permit application and **On-Demand Personal Mobility Rules and Guidelines** establish the following requirements that governed the Dockless Vehicle Pilot Program. Permitted operators were required to comply by April 15, 2019.

System Design

- **Term of permit:** 12 months.

- **Vehicle types:** Electric scooters, electric bikes, and pedal bikes. Adaptive vehicles were allowed but no operators applied for them.

- **Number of operators:** Unlimited.

- **Fleet size and management:** Operators were allowed a maximum of 10,500 vehicles, of which a maximum of 3,000 are allowed in non-Disadvantage Communities (DACs), 2,500 in DACs, and 5,000 in San Fernando Valley DACs.[1]

- **Product check:** Summary of operator vehicles, mobile applications, and certifications of safety standard compliance.

Monitoring & Operations

- **Data sharing:** Maintain MDS compliance and submit quarterly reports on usage rates of equity service options.

- **MyLA311 integration:** Integrate MyLA311 and close out service request tickets within 2 hours.

- **Parking compliance:** Remedy incorrectly parked and inoperable vehicles within 2 hours.

Financial & Risk Management

- **Insurance:** Maintain general commercial liability insurance, workers compensation insurance, umbrella insurance, performance bond throughout the pilot.

- **Proof of business tax compliance:** Register with the City's Office of Finance for business tax compliance.

- **Indemnification:** Agree to the City's Indemnification agreement.

Operator Plans

LADOT required operators to submit plans describing their approach to addressing several topic areas within the permit application. LADOT did not prescribe specific requirements, but rather gave operators flexibility to adjust operations and innovate on the following areas to achieve program objectives.

- **Implementation Plan:** Operators describe service implementation, including timelines and service area maps.

- **Parking Plan:** Operators describe strategies for promoting safe and legal parking practices, including incentives, fees, and employing the use of geofencing.

- **Equity Plan:** Operators describe criteria for low-income customer plans and non-smartphone and non-credit card payment options.

- **Community Engagement Plan:** Operators describe operator-led outreach activities, including key stakeholders, proposed activities, and engagement strategies in underserved communities.

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1   DACs refer to areas throughout California that most suffer from a combination of economic, health, and environmental burdens, as determined by the California Communities Environmental Health Screening Tool (CalEnviroScreen).

Key Takeaways

This report highlights four key takeaways. The takeaways summarized below will serve as common themes reflected throughout this report.

Expanded Mobility

Dockless vehicles served as a valuable mobility option for Angelenos, but failed to adequately serve communities with the greatest need for accessible and affordable mobility. During the pilot, Angelenos took a total of 10.3 million trips on electric scooters and bikes. During the same period, 19 million trips were taken on DASH and LADOT transit.

Riders primarily used electric scooters and bikes for regular commute and recreation trips. Dockless vehicle trips replaced trips from other modes including driving.

Providing abundant mobility options is not an end in itself, but a tool to address the broader challenges Angelenos face accessing opportunities to gain economic mobility. Thus, the Pilot Program highlighted the need to further incentivize and address the financial burdens, safety and access concerns, and geographic and technological barriers faced by vulnerable populations such as older adults, people with disabilities, and low-income households.

Responsible Data Use

LADOT's policy, planning, regulatory, and operational functions are the foundation of right-of-way stewardship. Without data and technology to manage movement and enforce rules, LADOT would not fulfill its stewardship responsibilities. As underscored in LADOT's Technology Action Plan (TAP), LADOT aims to use technology and elements of MDS to steward both the physical and digital public realm.

LADOT takes cybersecurity and rider privacy very seriously. The agency drafted Data Privacy Principles and operationalized most key actions related to these principles, per City Council directions. LADOT worked with the City Information Technology Agency and other data protection and security experts to implement additional data security controls, data sharing protocols and data breach protocols for the purposes of this program. Data privacy is an evolving policy area. LADOT will continue working with key stakeholders and experts in this space to ensure sensitive information is protected.

Efficient Management and Enforcement

LADOT staff developed a groundbreaking tool called MDS to evaluate the effectiveness of program and policy actions.

MyLA311 empowered people to share concerns in real time, and the city effectively used it to monitor transportation-related service requests and hold operators accountable to keep the public right-of-way clear. Lessons learned during this period will help other cities implement similar programs.

Innovation and Testing

The Pilot Program served as a testing ground for LADOT to better understand how to permit, manage, and regulate dockless vehicles. LADOT identified problems and experimented with different solutions throughout the pilot process.

Given that equitable access was a chief concern, LADOT tested program incentives and requirements to benefit disadvantaged communities. Overall, these incentives were not sufficient in achieving sizable deployment and access for low-income stakeholders.

LADOT experimented with physical and digital policy tools in select locations. LADOT installed drop zones in Downtown and Venice and collaborated with operators to test digital policy tools such as special operations zones (SOZs) and geofences.

03
The Tools

LADOT tested a wide variety of programmatic, digital, and infrastructure tools to manage the Dockless Vehicle Pilot Program and deliver on the program's key objectives: Safety, Equity, Access, and Quality of Life. The following section describes key pilot management tools and conveys the complexity of managing the Dockless Vehicle Pilot Program.

The Mobility Data Specification and Digital Policy

For years, cities across the country experienced a common problem when regulating shared mobility operators. Each city asked for unique data, in different formats, with varying degrees of precision and varying degrees of success to hold companies accountable to policy goals. This created an environment where every data point requested became a negotiation, and operators built custom data feeds or monthly reports at great cost and limited utility. Cities needed a common approach to benefit cities and operators, alike.

Pioneered by LADOT, the Mobility Data Specification (MDS) is a digital tool and notification system that allows cities and operators to share information. MDS conveys information in a standard format. Similar to a common language, MDS establishes a standard way to communicate information and regulations between operators and LADOT. MDS is a cost-effective tool to digitally manage public and private operators that use the public right-of-way because it minimizes the time, staffing, and resources needed for compliance, enforcement, and monitoring. The roadmap for MDS includes taxis, carshare, and buses.

OBJECTIVES ACHIEVED

⚠ Safety	✓	∴ Access	✓
👥 Equity	✓	💚 Quality of Life	✓

TAKEAWAYS

01 **Mobility**   02 **Data-Driven**   03 **Managed**   04 **Experimental**

How does MDS work?

Implementing MDS technology is part of a broader effort to understand dockless mobility and its implications for the general public. MDS articulates the operating requirements operators must follow to be compliant. Through MDS, LADOT can establish a Service Level Agreement (SLA) for operators and determine compliance and performance levels. The SLA provides notifications to LADOT from operators which reflect the behavior of dockless vehicles.

These are the agreements and notifications LADOT established, but any other city can establish metrics and notification agreements that work for their individual city priorities and the operators that operate within the public right-of-way.

Figure 2. How It Works

1 Deploy Scooter
Permitted operator notifies LADOT they deployed a scooter to PROW

2 Status Change
Permitted operator notifies LADOT they changed scooter status (e.g., in-service, out-of-service)

3 Remove Scooter
Permitted operator notifies LADOT they removed a scooter from PROW
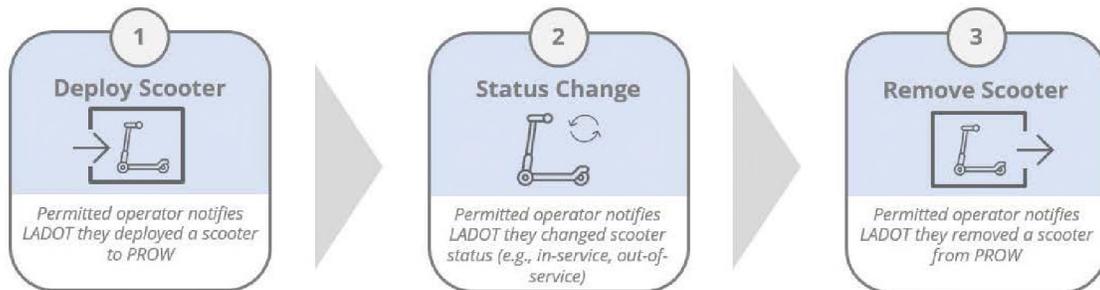
The City can now **conduct independent audits** to verify compliance of permitted operators in relation to the permit.

+

With **technical compliance confirmed** and **trusted data**, the city can:

- Build policies it can rely on
- Create operational improvements (i.e. Venice Special Ops Zone)
- Conduct enforcement of policies

The graphic above is an example of how LADOT receives notifications from operators, as part of its efforts to manage the public right of way and better understand on-demand technology and its implications on the City.

How was MDS used?

LADOT requires permitted operators operating in the public right-of-way to notify the City of movements of their GPS-enabled fleet. As the illustration below shows, LADOT collects vehicle and trip data. Vehicle data may help the city identify right-of-way concerns, such as an oversaturation of vehicles in an area. LADOT uses de-identified trips to understand ridership trends and utility of the services, to inform safety improvements and other planning efforts.

Figure 3. Data Use by Entity Type

Operator / Company Employee Data
Enables operators and company employees to charge, repair, manage vehicles

- Social Security Number
- Tax Information
- Bank Account

Rider Data
Enables rider to reserve and ride vehicles

- Full Name
- Home Address
- Cell Phone
- Email Address
- Credit Card
- Driver License (incl. photo)
- Birthdate
- Sex
- Height
- Weight
- Trip Costs
- Trip History
- Cell Phone GPS Location

Company

Uses employee and rider data to employ personnel to manage their vehicle fleet, and enable riders to use their vehicles.

Vehicle Data
Enables planning, regulation, and operations of public right-of-way

- Vehicle ID
- Trip Origin/Destination
- Trip Route
- Trip Duration
- Vehicle Status

Trip Data
Enables academic research and public insight

- Aggregated Trip Data
- Aggregated Trip Origin/Destination

City

Uses vehicle data to identify right-of-way concens, like having too many scooters in a particular area.

City ensures trip data is de-identified before making it available for public use.

MDS and Data Privacy

LADOT adheres to sound practices for privacy standards, commits to data collection transparency, and—above all else—protects individual privacy. MDS is designed to process only the most minimal vehicle data necessary to enforce city-defined policies. Additionally, the department applies strong privacy protections and security protocols to the vehicle data it receives. For example, raw MDS data is categorized as confidential under the City of Los Angeles Information Handling Guidelines, which exempts the data from the California Public Records Act. LADOT applies strong access controls and de-identification measures to the data. These measures are reflected in LADOT's Data Protection Principles, which include:

- **Data categorization:** Raw trip data is designated as Confidential Information.[2]

- **Data minimization:** Raw data will be aggregated, de-identified, obfuscated, or destroyed where there is no need for single vehicle data or where data is no longer needed for management of the public right-of-way.

- **Access limitation:** Raw trip data related to vehicles and vehicle trips is limited to what is required for operational and regulatory needs as established by City Council.

- **Security:** The City will enact administrative, physical, and technical safeguards to secure and assure integrity of data.

- **Transparency for the public:** Data types collected via the MDS and the length of time that data is retained will be shared with the public.

Data protection is central to how we manage digitally-enabled mobility services. **Appendix A** summarizes our approach to privacy and data protection, what are we doing today, and our action plan moving forward.

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2   LADOT designates raw trip data as Confidential Information under the City of Los Angeles Information Technology Policy Committee (ITPC) Information Handling Guidelines. This long-standing policy governs the obligations of the City to protect all manners of data under its control. LADOT will withhold this Confidential Information as exempt from release under the California Public Records Act.

During the pilot, digital tools helped LADOT communicate City policy directly to the companies operating in the city using code. MDS enabled LADOT to monitor and hold companies accountable to their obligations.

The Venice Special Operations Zone (SOZ) illustrates how MDS helps the City address community concerns and enforce existing rules. Compared to other areas of Los Angeles, Venice had some of the highest saturation of devices of any neighborhood in the city. This over concentration of activity led to a spike in neighborhood concerns during the initial months of the pilot. In May 2019, LADOT established the Venice Special Operations Zone (VSOZ) to address vehicle oversaturation and illegal riding on the Venice Boardwalk, bike path, and canals. The zone also allowed the department to test the use of geofence technology to reduce vehicle speeds to 0 mph. LADOT enacted the following digital policies in the Venice SOZ area:

- Deploy vehicles between the hours of 5:00 a.m. to 10:00 a.m. daily.

- Deploy a maximum of 150 vehicles across 22 LADOT-identified parking zones.

- Deploy up to five devices per operator per parking zone.

- Rebalance vehicles only within LADOT-identified parking zones after 10:00 a.m. daily.

Figure 4 illustrates the impact on Venice before and after we put the policy in place. The use of MDS to verify operator compliance, coupled with in-field enforcement, led to successful results. Scooter and bike saturation decreased from 270 average daily vehicles deployed pre-SOZ to 15 average daily vehicles deployed post-SOZ, across all operators. MyLA311 service requests fell by nearly 30% from June to September even as overall ridership climbed. In short, the SOZ allowed the department to preserve mobility options in a community while reducing clutter and neighborhood complaints. LADOT levied some penalties against non-compliant operators, but for the most part, operators collaborated with LADOT to achieve a good outcome.

Figure 4. Deployment of Dockless Vehicles in Venice Beach Before and After LADOT Implemented Special Operating Zones (SOZ)

Sunday, May 5, 2019 at noon

LEGEND
- Dockless Vehicle
- Venice Special Operations Zone

SANTA MONICA
VENICE BEACH
MARINA DEL REY

Sunday, September 16, 2019 at noon

LEGEND
- Dockless Vehicle
- Venice Special Operations Zone

SANTA MONICA
VENICE BEACH
MARINA DEL REY

The before and after images show how digital policy can have an efficient impact in keeping Venice Beach clear of dockless vehicles while keeping the public ROW clear.

Compliance Audits

Ensuring traffic law and regulatory compliance by vehicles operating in the public right-of-way is a constant and evolving challenge. People speed even though there are speed limits and they park their cars where they should not. As stewards of the public domain, LADOT and its partner agencies are continually challenged to educate road users and deliver on-the-ground enforcement to keep Angelenos safe while keeping people and goods moving.

Dockless vehicles present an equally challenging compliance environment. While LADOT establishes clear regulations governing deployment levels and other operational requirements, operators in a highly competitive start-up industry may have varying levels of staffing and resources to scale up and maintain compliance as they grow.

MDS and on-the-ground auditing work together to improve compliance and to test the validity of operator data. Some for-profit operators across many industries have falsified data to evade government regulation, particularly when those regulations have a fiscal impact. MDS reduces an operator's ability to manipulate data, and gives the city fundamental confidence in the accuracy of the information they are receiving. This transparency is critical to the City's ability to enforce regulations, plan, and invest in resources.

OBJECTIVES ACHIEVED

Safety	✓	Access	✓
Equity	○	Quality of Life	✓

TAKEAWAYS

01 Mobility	02 Data-Driven	03 Managed	04 Experimental

To supplement and cross-check technical reporting, LADOT performed monthly audits throughout Los Angeles to capture the following:

- **Venice SOZ deployment:** if operators exceeded the five-vehicle deployment maximum at designated parking zones and/or deployed outside of the approved zones

- **User parking:** how and where a vehicle is parked

- **Vehicle condition:** vehicle quality, remaining battery charge, displays required "No Riding on Sidewalks" decals

- **Unpermitted operators:** operators that deployed vehicles, yet do not have a permit

- **Location accuracy:** whether the vehicle's physical location matched what was in the operator app and MDS

Compliance Apps

LADOT developed and tested two mobile data collection tools to streamline the compliance auditing process. Using and testing new tools was a hallmark of the Pilot Program, helping LADOT to efficiently collect information and identify compliance issues. The sections below describe two of LADOT's most important compliance apps.

Audit Mobile App

LADOT used the Audit Mobile App to verify whether operators accurately registered and reported their deployed vehicles in MDS. The app uses MDS data to locate nearby vehicles, which enables LADOT to conduct on-the-ground audits using a mobile phone. Auditors can locate vehicles via an in-app map, look up information about specific vehicles, and report the following compliance violations:

- A vehicle is registered in MDS, but cannot be found where the operator reported it

- A vehicle is found in the public right-of-way, but not registered by the operator in MDS

- A vehicle is improperly parked (tipped over, in a prohibited area, or too many vehicles parked in a designated parking zone)

- A vehicle appears unsafe and should receive maintenance

Figure 5. Audit Mobile App

Compliance Apps Cont.

ArcGIS Collector Tool

LADOT also customized a geographic information system-based ArcGIS Collector tool into two digital data collection forms for compliance audits: (1) SOZ Compliance and (2) User Parking Compliance and Vehicle Quality. The SOZ Compliance Form assessed compliance to deployment maximums in the Venice SOZ. The User Parking Compliance and Vehicle Quality form documented vehicle location accuracy, how and where vehicles were parked, and the physical condition of vehicles throughout the city. Both forms are map-driven, meaning auditors can record vehicle location by dropping a pin on a map and export for further analysis later.

When field audit findings are compared against MDS data in real time, LADOT can use data to validate whether operators are allowing vehicles to occupy the physical realm in quantities that are above and beyond the operator's cap allotment. On the ground field checks, for example, have revealed cases where vehicles are being reported as removed but are physically still on-street. This has been evident with the introduction of new device models.

Figure 6. Audit Collector Tool
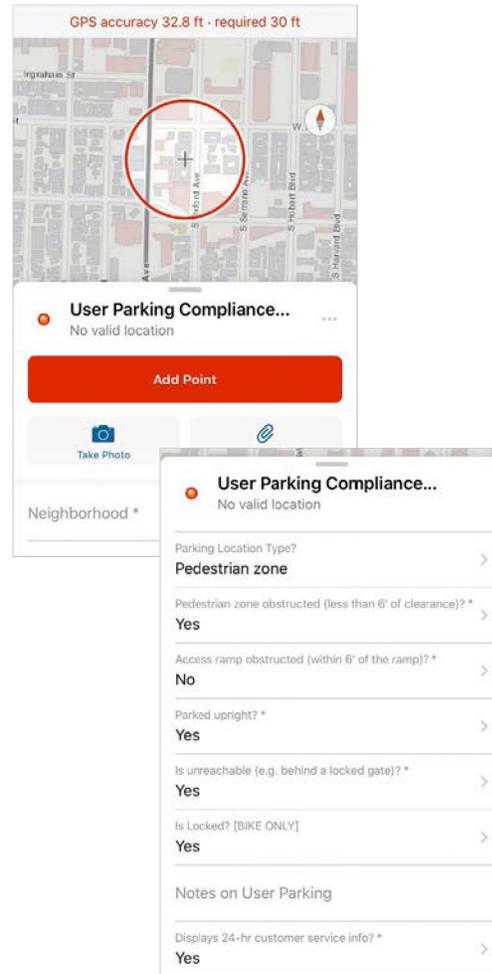
LADOT is exploring developing a tool that will simplify data collection by equipping the app with a QR code scanner to quickly scan the VIN of the vehicle being audited and to help the auditor assess and compare the field status of a vehicle to the data in the operator app.

Physical Tools

In partnership with Council District 5, LADOT designed and applied more than 40 "No Electric Scooter Riding on Sidewalk" stencils on pedestrian-heavy sidewalks, including Third Street, Melrose Avenue, and Beverly Boulevard. The goal of applying these stencils was to increase safety and awareness of sidewalk riding rules.

Sidewalk stencils are a cost-effective method to supplement safety reminders that are currently messaged in-app and on devices. LADOT determined sidewalk stencil locations primarily by public perception and high-activity sites. In the future, LADOT aims to continue using trip and deployment data to identify additional streets where high ridership levels overlap with high pedestrian volumes.

OBJECTIVES ACHIEVED

Safety	✓	Access	✓
Equity	✓	Quality of Life	✓

TAKEAWAYS

| 01	02	03	04
Mobility	Data-Driven	**Managed**	**Experimental**

Drop Zones

Drop Zones are specially marked parking areas designed for dockless mobility devices. Drop Zones consist of several vinyl stickers, which can be moved as parking demand changes. In an effort to keep sidewalks clear, LADOT installed over 30 Drop Zones throughout Downtown prior to issuing permits in April 2019, determined in partnership with the CD 14 council office and local business owners. LADOT vetted the proposed locations to ensure they were ADA-compliant. We installed additional Drop Zones in other parts of Downtown and Venice, bringing the total number of Drop Zones to 72. Several operators created digital replicas of Drop Zones within their apps to inform users where to park in Downtown and Venice.

Drop Zones are a key component to LADOT's enforcement strategy within the Venice SOZ. LADOT has paired this physical infrastructure with a policy that caps the number of scooters each operator can deploy within a Drop Zone. In doing so, LADOT has effectively communicated to operators where to deploy while simultaneously regulating the number of vehicles within Venice.

Our experience with Drop Zones in the first year was mixed: while they provided an opportunity for the public to engage with LADOT and indicate where they perceived a need, the decals faded quickly, and the locations did not always match with high scooter use. In year two, LADOT plans to create an ongoing inventory of decal locations and match those to highest observed use.

Figure 7. Location of Drop Zone As Shown in Operator App
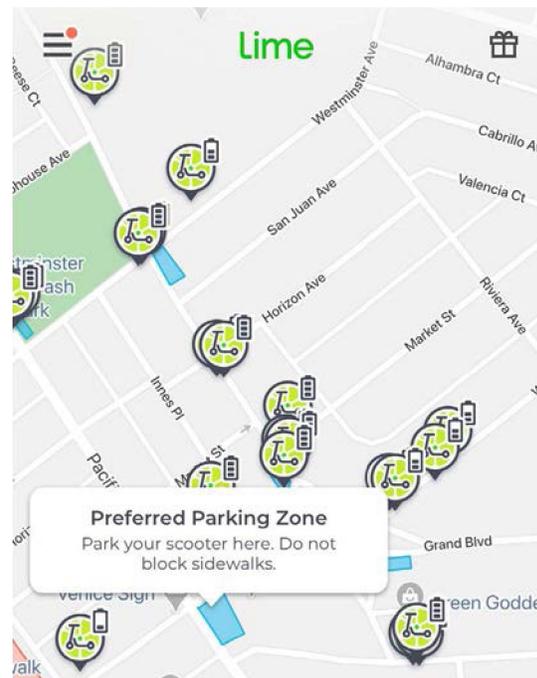
Location of Drop Zones as shown in operator app
Source: Lime

Corrals

Drop Zone decals are most appropriate on sidewalks, which means that they sometimes result in vehicles spilling onto pedestrian pathways. The growing number of dockless bikes and scooters parked on sidewalks can make it difficult for people with disabilities and pedestrians to get around. Bike parking corrals are places where the city replaces a single parallel parking space with several bike parking racks. Corrals can be a safe place to store scooters in an organized way off the sidewalk. During the year one pilot, LADOT installed a bike parking corral on Abbot Kinney to assist with the Venice Special Ops Zone, which was successful in creating storage to match the demand without creating obstacles and clutter on the sidewalk.

Safe Riding Infrastructure

A key concern regarding the dockless vehicles is sidewalk riding and the potential risk of pedestrian-involved collisions. Current regulations require dockless mobility users to ride in the travel lane, however, users may feel unsafe riding alongside automobiles. In year one, LADOT evaluated where people were riding in downtown against available crash data for all users. The data informed an infrastructure investment plan. Approximately $2 million from permit fees will go towards building infrastructure, including but not limited to the extension of protected bike lanes on Figueroa Street as part of the MyFigueroa Streetscape Project and the installation of protected bike lanes on 7th Street.

Data on micromobility movement from 2019 provides evidence that protected bike infrastructure is important to travelers. In 2019, LADOT installed more than a dozen protected bikeways throughout the region. LADOT installed protected bikeways in Downtown LA on Main Street and Spring Street The Main and Spring Forward project (https://ladotlivablestreets.org/projects/Main-&-Spring-Forward). While the Spring Street installation predated MDS data gathering, the Main Street portion of the protected bikeway was installed in November 2019.

Figure 8 shows the change in ridership between October and December 2019 on six different streets in the Main and Spring Forward project area. Although the protected bike infrastructure was already installed on Spring Street in early 2019, ridership on Main Street (only one block away) increased 4.3% following the installation of a two-way protected bike lane, indicating that dedicated, protected bike infrastructure is an important element of a comprehensive program to address safety and sustainability.

Figure 8. Downtown Dockless Ridership after Installing Protected Bike Infrastructure

MyLA311

As part of the One-Year Permit Program, LADOT required operators to integrate with MyLA311, a non-emergency request management system that links residents to city services and information. Operators were expected to respond to service requests by inspecting, relocating, or removing the vehicle if it was improperly parked or in need of maintenance. Per permit requirements, operators must respond to service requests within two hours if the request was submitted between 7 a.m. and 10 p.m. LADOT aggregates service request information to track high-level metrics that inform program management and compliance (see page 63 for operator performance).

OBJECTIVES ACHIEVED

▼ Safety	✔	⋮ Access	◯
Equity	◯	Quality of Life	✔

TAKEAWAYS

01 Mobility 02 Data-Driven 03 Managed 04 Experimental

While MyLA311 presented a comprehensive list of violations, it did not cover several edge cases, which required increased collaboration between LADOT and operators. For example, operators struggled to meet performance targets for management requests involving devices found in the Venice Canals. Operators that had access to dive teams dedicated to retrieving devices from bodies of water were able to respond quicker than those with smaller operations teams. Through these discussions, LADOT further adjusted their methodology for calculating operator responsiveness by removing unique use cases from monthly averages and tracking them separately, thereby giving operators greater flexibility to resolve these issues.

Figure 9. MyLA311 Service Request App
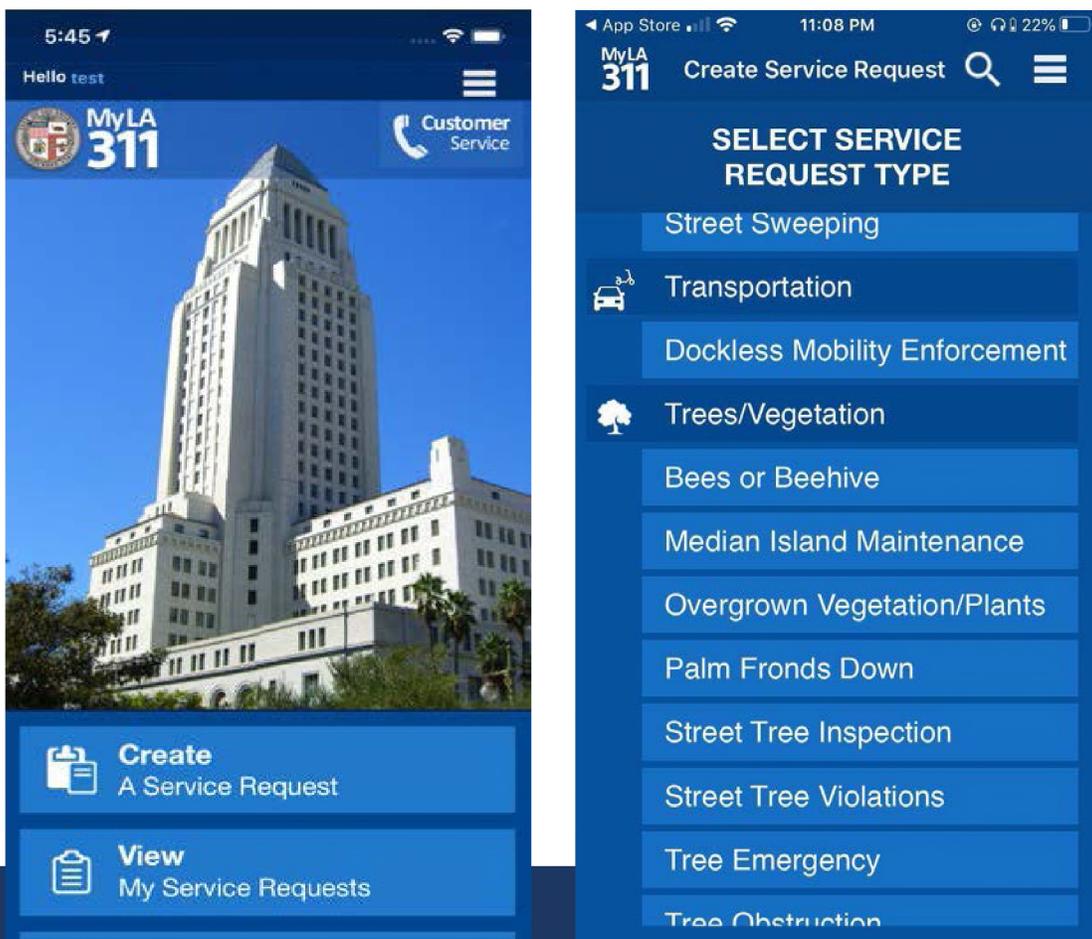
Community Engagement and Other Feedback Tools

Community engagement was used as a tool to understand issues and opportunities related to program design, policy gaps, and product-market fit. LADOT organized and hosted quarterly community meetings to provide general information on the permit program and to facilitate dialogue between the public and the operators. Meetings typically consisted of a brief presentation on program updates from LADOT staff and a period for comments and questions. Meeting topics ranged from demonstrations on how to use MyLA311, criteria for low-income plans, and proper parking practices. Operators, local business improvement districts, Neighborhood Councils, and Council District staff attended these meetings and were given the opportunity to ask questions and share their feedback.

LADOT organized and hosted quarterly community meetings to provide general

information on the permit program and to facilitate dialogue between the public and the operators. Meetings typically consisted of a brief presentation on program updates from LADOT staff and a period for comments and questions. Meeting topics ranged from demonstrations on how to use MyLA311, criteria for low-income plans, and proper parking practices.

We chose meeting locations based on electric scooter and bike ridership trends from MDS and MyLA311 response volumes. LADOT also conducted three quarterly user surveys between May 30 and December 18, 2019, generating 7,848 responses. All permitted operators distributed surveys in-app at the end of a ride. Key survey results are captured in Section 4.

OBJECTIVES ACHIEVED

Safety	✓	Access	✓
Equity	✓	Quality of Life	✓

TAKEAWAYS

01 Mobility   02 Data-Driven   03 Managed   04 Experimental

Educational Campaigns

In the months leading up to the Dockless Vehicle Pilot Program, LADOT collaborated on a safety campaign with Santa Monica to establish a unified message around safe riding and common sense parking practices. LADOT purchased ad space on DASH and Metro buses and bus shelters to deliver the "Take the Friendly Road" campaign message. Hundreds of Metro and DASH buses displayed interior bus cards. LADOT jointly ran safety ads with the City of Santa Monica that included messaging from "The Electric Scooter Rules to Know Before You Go."

The campaign touched on various topics, including:

- Parking responsibly;
- Only one rider per scooter;
- Riding on the street;
- Driver's license requirement;
- Helmet use recommended; and
- Filing service requests through MyLA311.

OBJECTIVES ACHIEVED

Safety	✓	Access	○
Equity	○	Quality of Life	✓

TAKEAWAYS

01 Mobility 02 Data-Driven 03 Managed 04 Experimental

Figure 10. Dockless Mobility Educational Campaign Materials

DRIVE SAFE!
KNOW THE RULES

- **Check brakes and wheels before riding**
Report damaged scooters to the appropriate company

- **Follow traffic rules**
Stay to the right of traffic and use bike lanes when available

- **Park with care on the sidewalk**
Park near bike racks or by the curbside

- **Don't ride on the sidewalk**
It's the law

- **Ride safely**
Helmets are encouraged

- **Don't park in ramps or at blue, yellow, or white curbs**
Blocked paths can be dangerous for persons with disabilities

- **Don't block ADA access ramps or building entrances**
Leave at least 6 feet of sidewalk space for ADA Accessibility

LADOT

take the **friendly road** for a safe santa monica

**BE SAFE. AVOID A TICKET.
WEAR A HELMET.
PARK RESPECTFULLY.
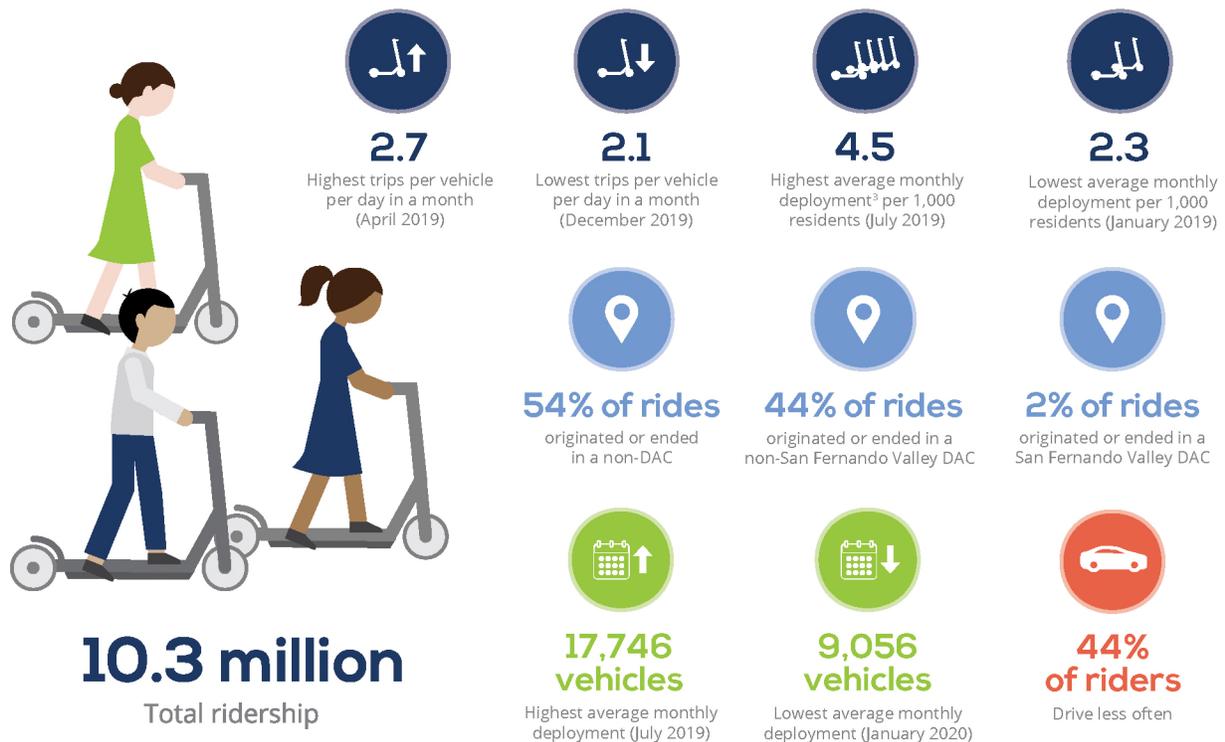HAVE A LICENSE.
ONE PERSON PER SCOOTER.
RIDE ON THE STREET.**

THE e⚡SCOOTER RULES TO KNOW BEFORE YOU GO

04
The Results

The Dockless Vehicle Pilot Program showed how electric scooters and bikes can bolster LADOT's vision for a mobility system that is safe, equitable, accessible, and supportive of people's quality of life. The pilot demonstrated LADOT's capacity and technology resources to create flexible regulatory frameworks to evaluate new mobility services. The pilot highlighted ongoing challenges and lessons learned that will guide the Year 2 program and other future mobility permit programs.

Figure 11. Dockless Pilot Results for Year 1

2.7
Highest trips per vehicle per day in a month (April 2019)

2.1
Lowest trips per vehicle per day in a month (December 2019)

4.5
Highest average monthly deployment[3] per 1,000 residents (July 2019)

2.3
Lowest average monthly deployment per 1,000 residents (January 2019)

54% of rides
originated or ended in a non-DAC

44% of rides
originated or ended in a non-San Fernando Valley DAC

2% of rides
originated or ended in a San Fernando Valley DAC

10.3 million
Total ridership

17,746 vehicles
Highest average monthly deployment (July 2019)

9,056 vehicles
Lowest average monthly deployment (January 2020)

44% of riders
Drive less often

---

3   Deployment within the context of this report is defined as the average vehicle state of all vehicles in the public-right-way for a given month, regardless of how the vehicle ended up in the right-of-way (e.g. provider drop-off or user trip end, etc.).

Access and Availability

LADOT built a pilot program that enabled permitted operators to provide abundant, readily available mobility to a wide variety of the city. If operators elected to serve the San Fernando Valley and disadvantaged communities, they could deploy up to 10,500 vehicles at a time. The number of actual deployed vehicles systemwide declined precipitously over the course of the pilot, from 17,746 vehicles in July 2019 to 9,056 vehicles in January 2020. By the end of the pilot, deployment numbers were almost half of what they were during peak deployment periods, largely due to several operators making business decisions to reduce deployment, seasonal ridership impacts, and Bolt leaving the market, among other reasons.

OBJECTIVES ACHIEVED

Safety

Access

Equity

Quality of Life

TAKEAWAYS

01 Mobility

02 Data-Driven

03 Managed

04 Experimental

Figure 12. Average Daily Trips by Electric Scooters and Bikes
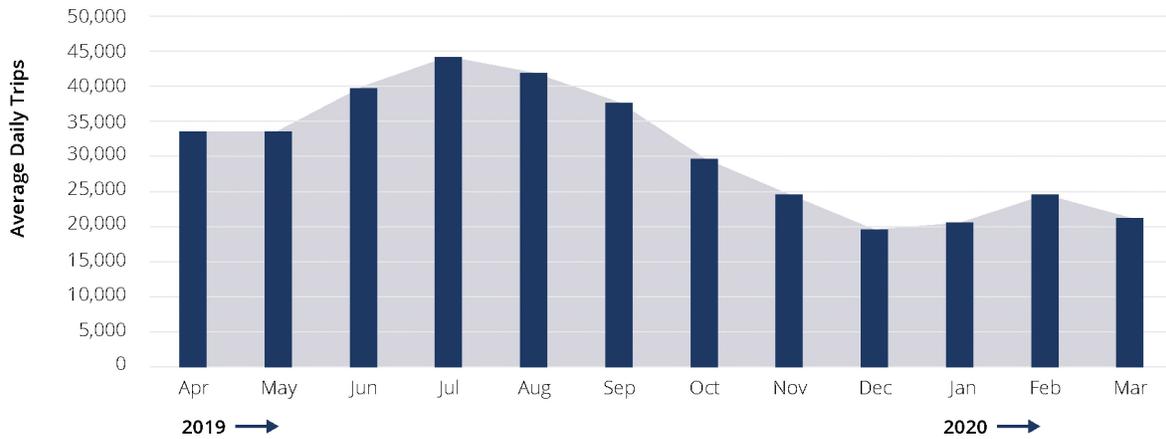
Deployment in San Fernando Valley (SFV) DACs peaked in July 2019 with only 551 vehicles while deployment in Non-SFV DACs peaked in August with 6,616 vehicles. By the end of the pilot, SFV-DAC deployment dropped 19% from peak deployment periods. Taken together, these trends suggest deployment patterns saturated everywhere but SFV DACs a few months after the pilot began. The fleet cap incentive and reduced fees were insufficient on their own to induce operators to deploy in the San Fernando Valley or to provide consistent service in other disadvantaged communities.

Figure 13. Total Monthly Deployment by Area Type

Figure 14. Dockless Activity in SFV and non-SFV DACs
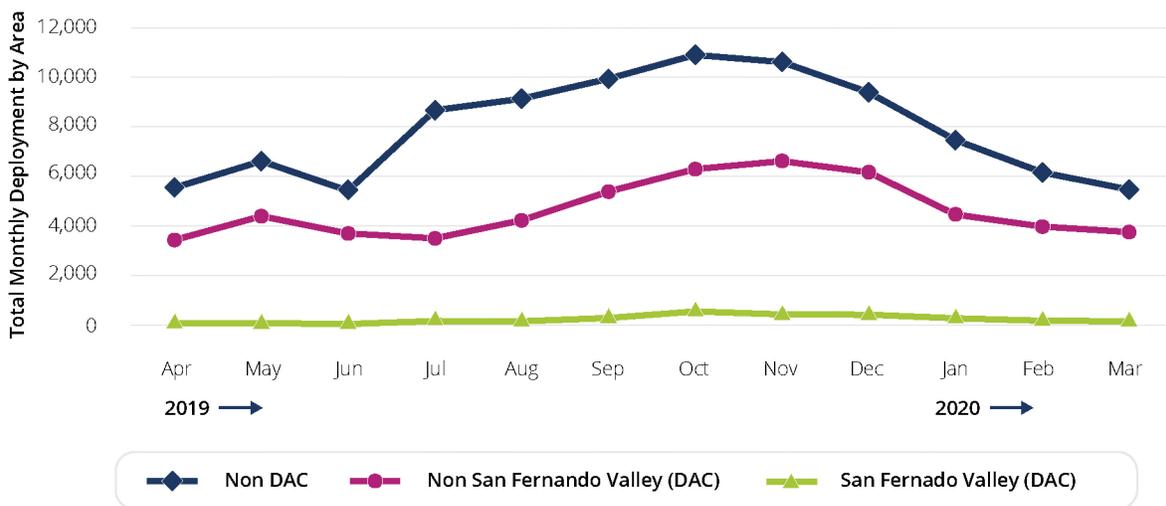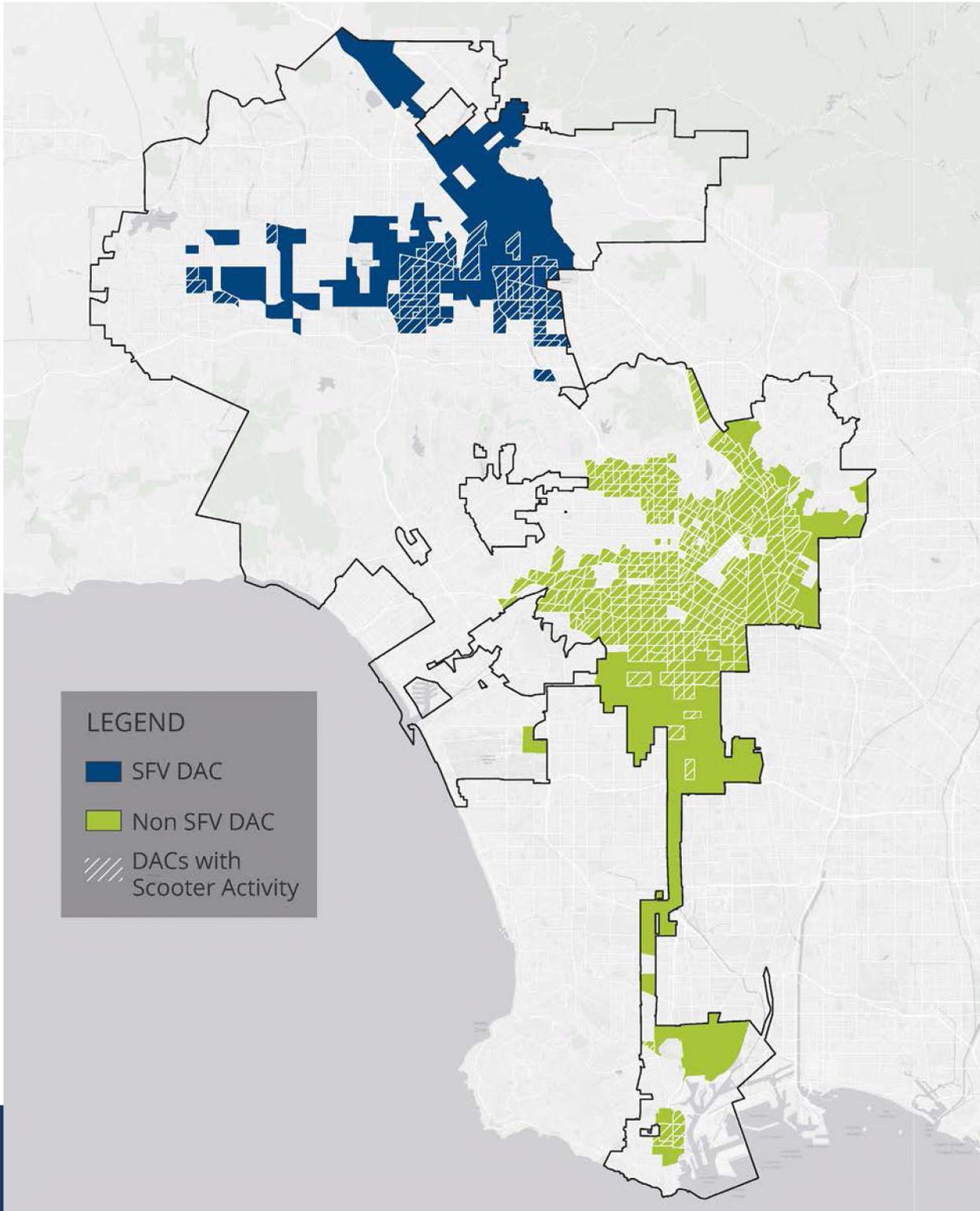

LEGEND

SFV DAC

Non SFV DAC

DACs with Scooter Activity

Ridership and Mobility

During the pilot period, people rode electric scooters and bikes throughout Los Angeles to varying degrees. Ridership trends, trip patterns, and user types help inform whether the Pilot Program was effective in its reach. Riders took a total of 10.3 million trips between April 2019 and March 2020, with activity peaking during summer months. Average daily trip volumes by month convey similar trends.

Ridership patterns mirror deployment patterns. The more vehicles that are deployed, the more people use them. Conversely, when systemwide fleet size decreases, so does use. As the program progressed, use grew to 76 rides per month per device in July 2019. This indicates that there is a demand for electric scooters and bikes if readily available and accessible. In reviewing lessons learned from the Venice Special Operations Zone, a high level of saturation is not necessary to achieve strong ridership and improve mobility. A more desirable outcome would be a large fleet more evenly deployed throughout the city to ensure a high number of trips without creating neighborhood complaints.

OBJECTIVES ACHIEVED

Safety	○	Access	◐
Equity	○	Quality of Life	○

TAKEAWAYS

01 Mobility	02 Data-Driven	03 Managed	04 Experimental

Figure 15. Total Trips and Average Daily Trips per Month

Figure 16. Average Monthly Device Use
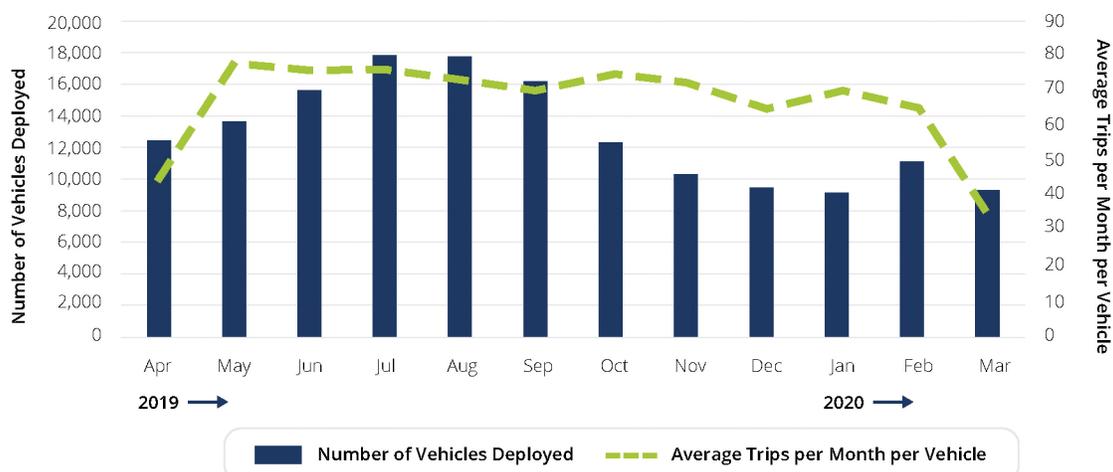
Over 50% of trips originated or ended in non-DACs, 44% originated or ended in non-SFV DACs, and 2% of all trips began or ended in SFV DACs. While this trend is generally reflective of overall deployment, operators clearly avoided some communities, and thus ridership is low or non-existent. For example, the Pico Union/Macarthur/Westlake neighborhood accounted for 1.4% of all trips even though it is a dense, well-connected part of the city with need for affordable mobility and high transit ridership.

LADOT found little difference between trips ended by customers and those delivered by rebalancers. In other words, scooters often stayed close to where operators deployed them. These findings highlight the need to restructure requirements and incentives to encourage deployment and usage in disadvantaged communities.

Figure 17. Trip Ends and Operator Drop Offs of Dockless Vehicles in Downtown LA
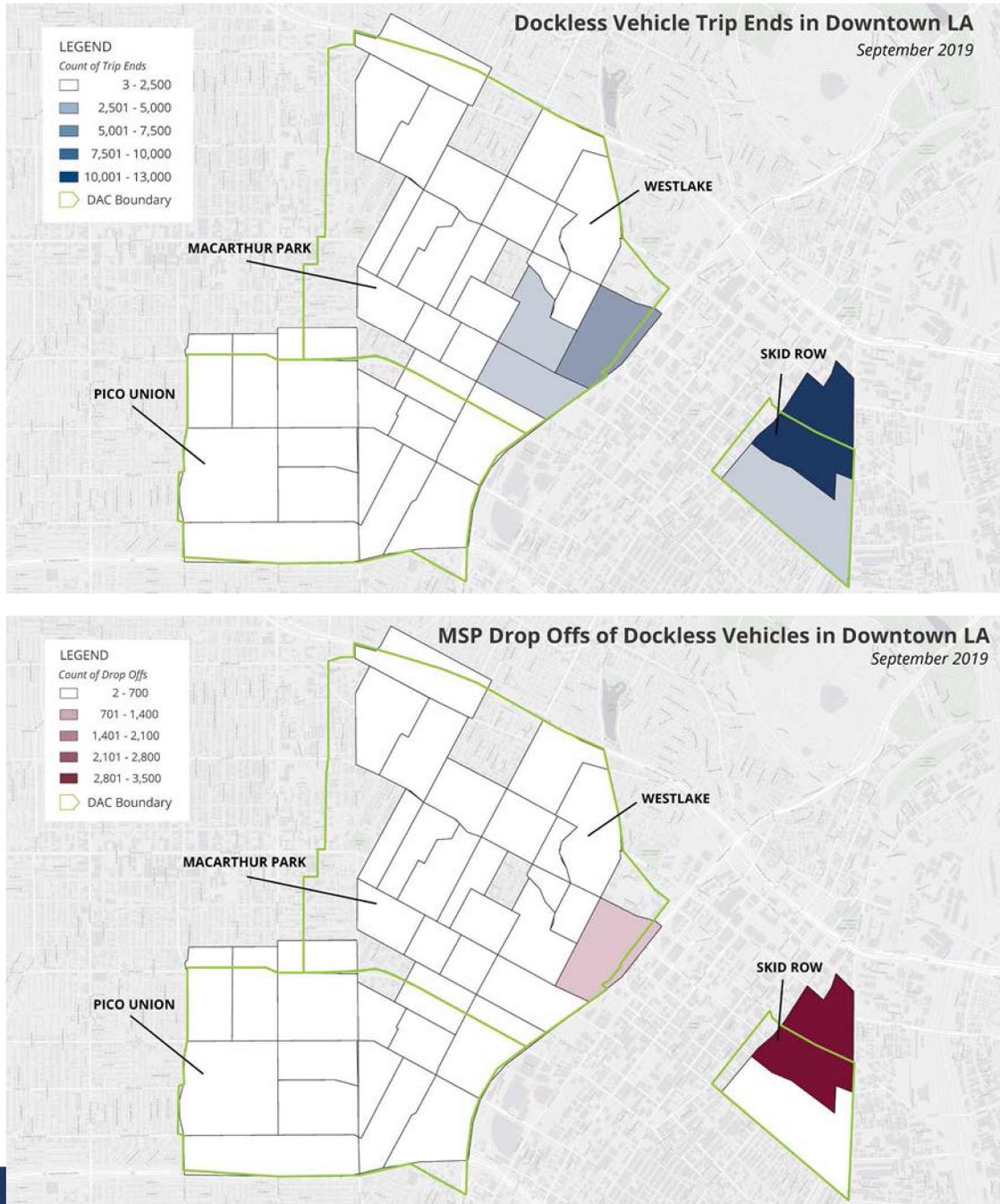
These maps compare operator drop offs and user trip ends by census tract in disadvantaged communities in Downtown Los Angeles neighborhoods of Pico Union, MacArthur Park, and Skid Row. In some areas, deployment is balanced with trip ends, while other areas show low activity. For example, shades of red show the number of operator vehicle drop offs and shades of blue show the number of vehicle trip ends that riders have made in the same area.

Figure 18. Trip Ends and Operator Drop Offs of Dockless Vehicles in Pacoima
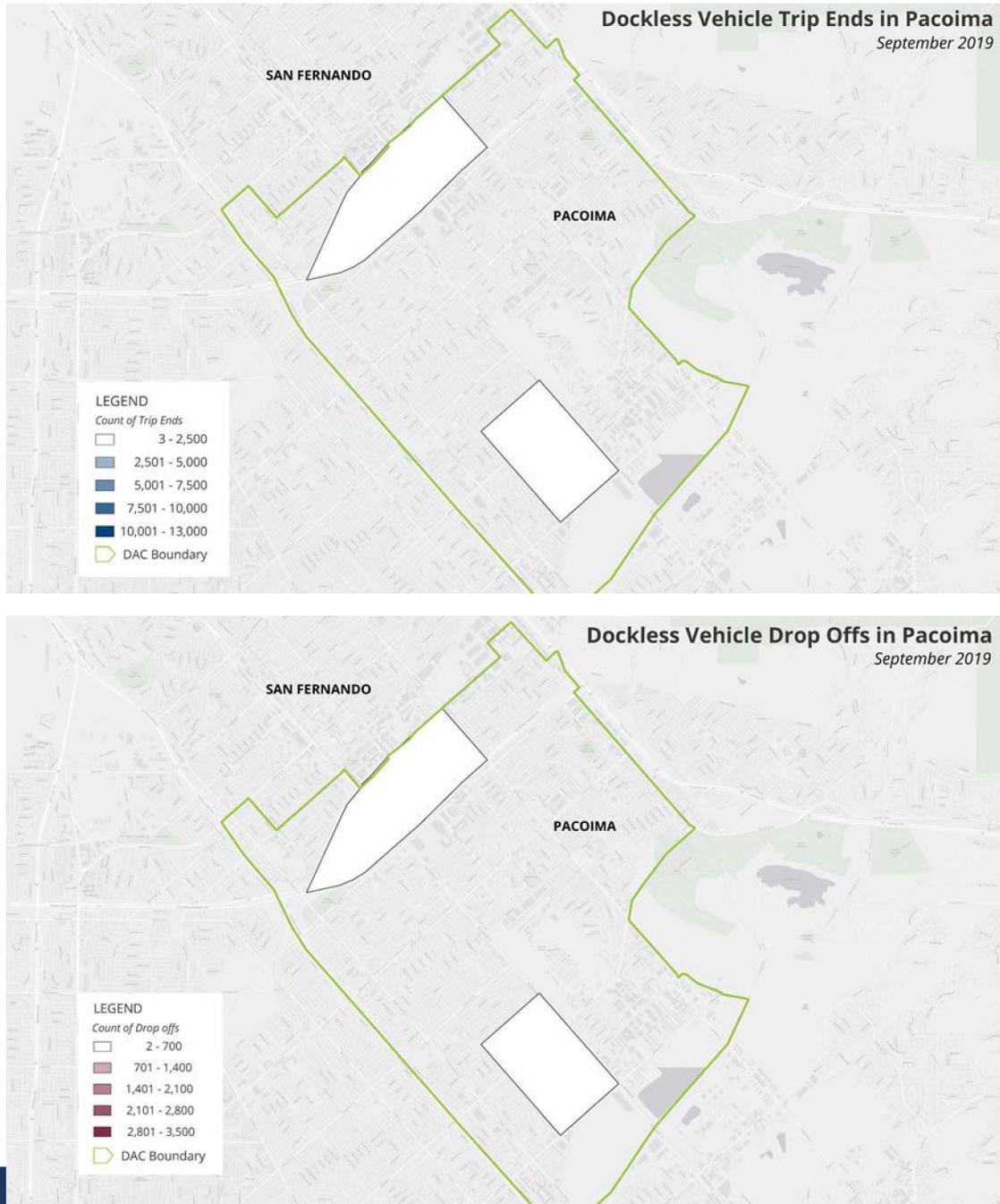
These images show a comparison between operator drop offs and user trip ends by census tract in disadvantaged communities in the Pacoima neighborhood. Pacoima has low vehicle and operator activity (shown in white).

Ridership Profile

According to survey results, the Pilot Program supported a wide variety of trips for residents and visitors to Los Angeles. Of the 7,848 people who completed LADOT's user survey, 70% are Los Angeles residents, 16% were residents of other LA County areas, and out-of-county visitors made up 15% of respondents.

Survey respondents indicate a higher share of participants who identify as male (64%), higher income, and between the ages of 18-34 (58%) than the overall demographics of the pilot geography. Nearly a quarter of respondents reported earning more than $100,000, which exceeds the median household income for LA County ($68,093), while 16% earn between $50,000 and $74,999. Additionally, roughly 12% of respondents fall below the federal poverty line, though it is unclear whether this represents jobless or low-wage students. Sixty percent of respondents who reported living in Los Angeles reported owning a vehicle, while 26% do not have regular access to a vehicle, suggesting significant potential for substituting car trips and providing more mobility for those with limited options.

Operators should actively address barriers to reaching a more diverse user base and achieve a rider profile that is representative of Los Angeles' demographics.

OBJECTIVES ACHIEVED

Safety	Access	
Equity	Quality of Life	

TAKEAWAYS

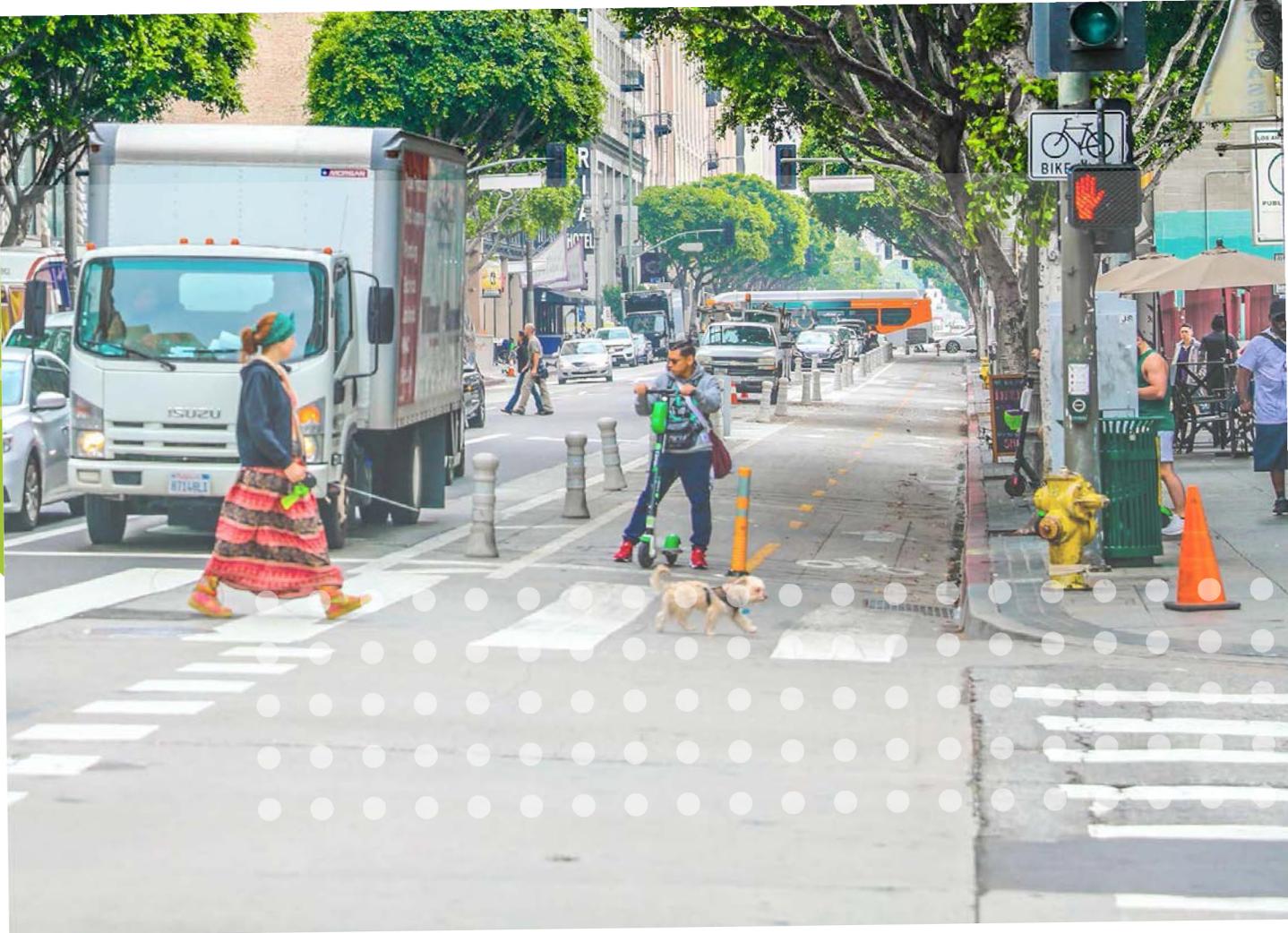01 Mobility 02 Data-Driven 03 Managed 04 Experimental

60% of people reported have access to a vehicle

26% of people **do not** have regular access to a vehicle

64% of people identify themselves as male

58% of people are between the ages of 18-34

Why People Ride

Dockless vehicles served as a viable transportation option for many Angelenos for a variety of trip purposes. Almost half of all trips were essential trips, which include commuting to and from school or work, accessing healthcare and child care services, and accessing transit. According to user surveys, nearly a third (32%) of trips were work- or school-related. More than half of all respondents who ride frequently (at least 3 times a week), use dockless electric scooters or bikes for commuting.

Almost a quarter of trips were for recreation, which suggests people simply enjoyed riding them. These trends are similar to those in Santa Monica[4] and Portland[5] where dockless mobility devices were most commonly used for work-related (29% and 18%, respectively) and recreational trips (26% and 28%,

Figure 19. Trip Purpose
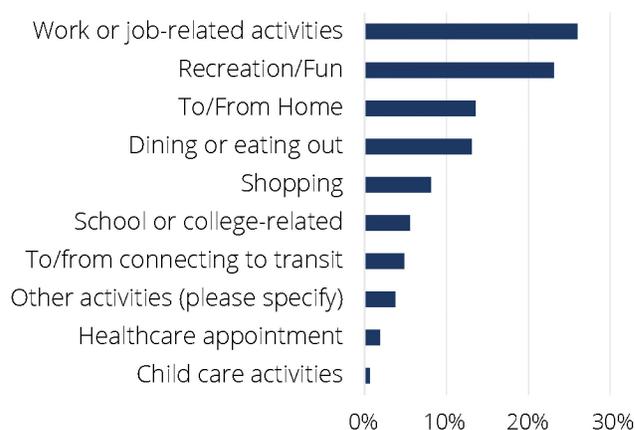
respectively). In Chicago,[6] motivations for riding varied by how frequently they reported using dockless mobility devices.

Dockless mobility helped with daily errands and other essential trips. Eight percent of people use dockless mobility devices for shopping trips, 2% for healthcare appointments, and 1% for childcare activities.

OBJECTIVES ACHIEVED

- Safety
- Access
- Equity
- Quality of Life

TAKEAWAYS

01 Mobility   02 Data-Driven   03 Managed   04 Experimental

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4   Portland Bureau of Transportation. 2018 E-Scooter Findings Report. 15 Jan. 2019.
5   City of Santa Monica. Shared Mobility Pilot Program Report. Nov. 2019.
6   City of Chicago. E-Scooter Pilot Evaluation. Jan. 2020.

Where People Go

Dockless electric scooter and bike deployment, and therefore activity, peaks in central Los Angeles where neighborhoods have denser concentrations of housing, jobs, and retail/entertainment than other parts of the city. The top 10 neighborhood destinations for dockless micromobility trips were Downtown, Venice, Hollywood, Koreatown, Westwood, University Park, Westlake, Fairfax, Mid-Wilshire, and North Hollywood. The top five neighborhood destinations in the San Fernando Valley were North Hollywood, Studio City, Van Nuys, Woodland Hills, and Northridge. Trip ends were significantly lower in South Los Angeles, but its top five neighborhood destinations were University Park, Exposition Park, Historic South-Central, West Adams, and Central-Alameda.

While the Pilot Program established clear destination hot spots, safe streets— supported by infrastructure—mattered to riders. The majority of survey respondents (66%) would ride on-street only if bicycle facilities (i.e. bike lanes, protected bike lanes, greenways, etc.) are available. Over half of respondents (53%) rode on-street without bike lanes and 32% rode on sidewalks.[7] The lack of safe riding infrastructure was a significant barrier to entry for many riders and may lead to continued sidewalk riding. To curb illegal sidewalk riding, LADOT will continue to endeavor to build safe infrastructure on streets with high ridership.

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7   Respondents were given the option to select all responses that apply for this question. As such, the cumulative total of responses is greater than 100%.

OBJECTIVES ACHIEVED

⚠ **Safety**	○	⦂⦂ **Access**	◐
🧍 **Equity**	○	♥ **Quality of Life**	○

TAKEAWAYS

01 🛴 **Mobility**   02 📊 Data-Driven   03 📋 Managed   04 ⚗ Experimental

Figure 20. Top Neighborhood Destinations for Dockless Micromobility Trips

NORTHRIDGE

VAN NUYS

NOHO

WOODLAND HILLS

STUDIO CITY

HOLLYWOOD

FAIRFAX

WESTWOOD

KOREATOWN

WESTLAKE

MID-WILSHIRE

WEST ADAMS

UNIVERSITY PARK

DTLA

EXPO PARK

SOUTH CENTRAL

CENTRAL-ALAMEDA

VENICE
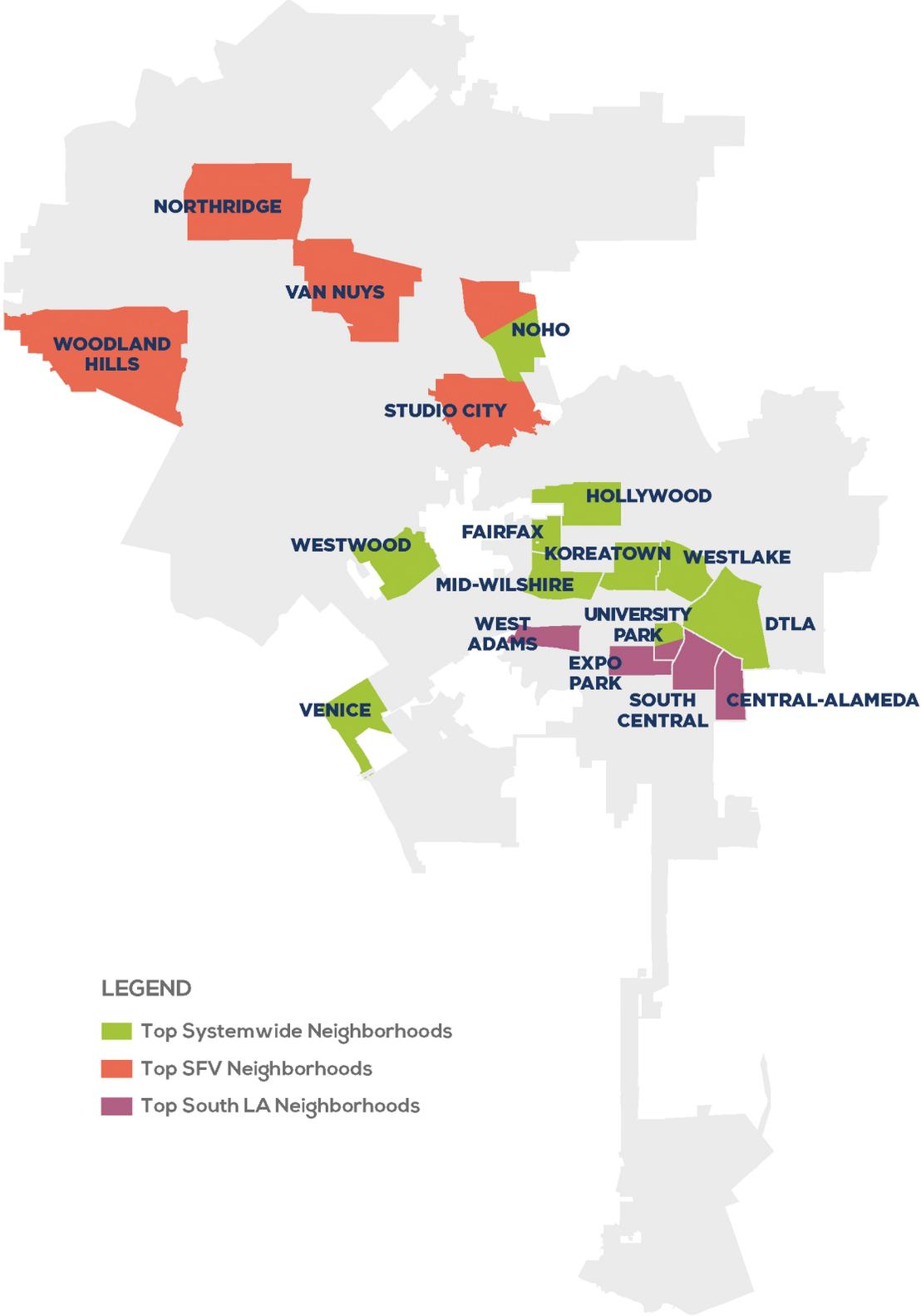
LEGEND

Top Systemwide Neighborhoods

Top SFV Neighborhoods

Top South LA Neighborhoods

Where People Park

Given the dockless nature of electric scooters and bikes, a key concern amongst City Council members, advocacy groups, and the general public is tidy vehicle parking. According to compliance audit data, 47% of audited vehicles were parked in the amenity zone, 26% were parked in the pedestrian zone, 9% were parked in the frontage zone, and 2% were parked on private property. While these results are similar to what has been observed in other cities, even just one vehicle blocking an ADA access ramp is one too many. Further enforcement, public education, and parking infrastructure is needed to reduce the number of improperly parked vehicles.

FRONTAGE ZONE	PEDESTRIAN ZONE	AMENITY ZONE
9%	26%	47%

OBJECTIVES ACHIEVED

Safety	◐	Access	◐
Equity	○	Quality of Life	◐
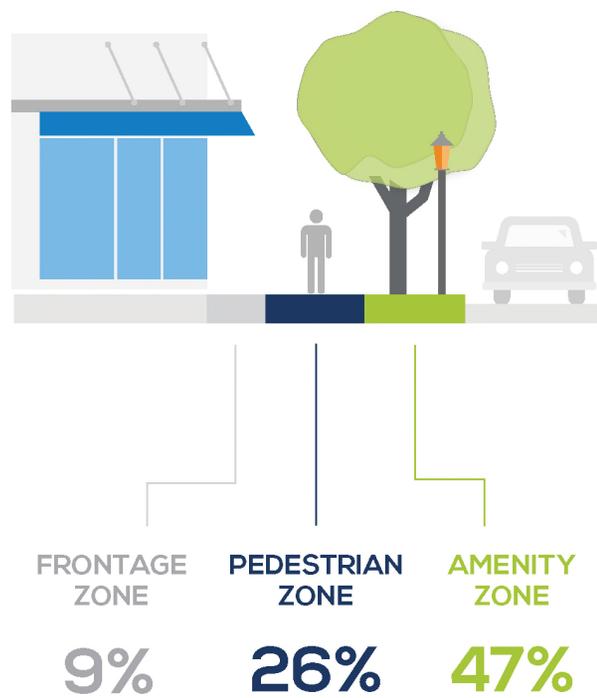
TAKEAWAYS

01 Mobility 02 Data-Driven 03 Managed 04 Experimental

Mode Shift

LADOT permitted dockless vehicles to expand mobility options and encourage mode shift to more sustainable options. Electric scooters and bikes have begun to change how some people get around. Most riders drove less (44%) and used taxi/ridehailing services like Uber and Lyft less (49%) since first using electric scooters or bikes, indicating that dockless vehicles can reduce passenger vehicle miles traveled and associated greenhouse gas emissions. While some early studies suggest that operational emissions and lithium ion battery disposal may negate the sustainability benefits of dockless mobility, LADOT needs to better understand the lifecycle costs of dockless mobility.[8]

Overall, most survey respondents noted that their mode usage is about the same as before: walking (55%), biking (60%), and use of transit (59% bus, 61% rail). Nearly a third of survey respondents (29%) walk less which might suggest reduced physical activity. However, this does not reflect the distance to walk to and from an available electric scooter or bike, which often ranges between 100 feet and a quarter mile.

More granular, longitudinal data will help LADOT understand the long-term implications to travel behavior. These initial results suggest dockless mobility may replace some walking and driving trips.

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8   Joseph Hollingsworth et al 2019 Environ. Res. Lett. 14 084031

OBJECTIVES ACHIEVED

Safety   ○   **Access**   ◑

Equity   ○   **Quality of Life**   ○

TAKEAWAYS

01 **Mobility**   02 Data-Driven   03 Managed   04 Experimental

Figure 21. Mode Shift Since Using Electric Scooters or Bikes

Mode	Less Often	About the Same	More Often
Public-Transit - Bus	31%	59%	10%
Public Transit - Rail	24%	61%	15%
Taxi/Ride Hail	49%	43%	7%
Driving alone	44%	51%	5%
Bike Share	37%	59%	5%
Personal Bike	34%	60%	6%
Walking	29%	55%	15%

Legend: ■ Less Often ■ About the Same ■ More Often
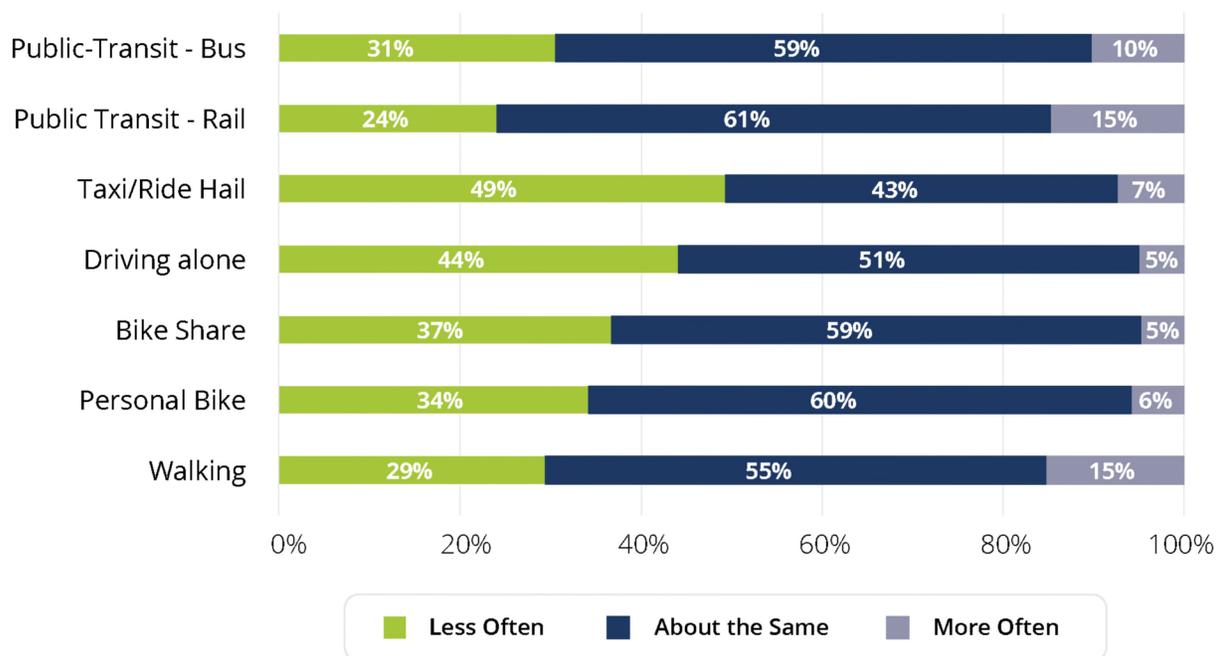
Average Trip Distance

Nearly 70% of survey respondents said they would have walked (48%), hailed a ride using Uber or Lyft (21%), or driven alone (12%) had electric scooters and bikes not been available. Across Los Angeles County, the average recorded ridehail trip is between two and four miles.[9] These results suggest that dockless vehicles are used for short-distance trips. A snapshot of distance traveled by dockless vehicles over the course of two weeks in October shows the average distance traveled for scooters was 0.97 miles, and the average distance for bicycles was 0.90 miles.[10] A third of dockless mobility trips replaced what would have otherwise been made by car, either alone or through a ridehailing service.

0.97 miles

0.90 miles

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9   Feigon and Murphy. Broadening Understanding of the Interplay Between Public Transit, Shared Mobility, and Personal Automobiles. 2018. TCRP Project J-11/Task 25 Final Report.

10   Distribution of Trip Distance by Vehicle Type for October 1-14, 2019.

CO2 Impact of Micromobility

Micromobility has the potential to replace single-occupant car and ridehailing trips, thereby reducing emissions. Using a combination of quarterly survey results, trip data, and life cycle CO_2 emissions assumptions for each mode, the 8.4 million miles travelled on dockless vehicles during the Pilot Program resulted in an estimated reduction of 1,802 metric tons in CO_2 emissions.

Figure 22 shows the estimated CO_2 impact micromobility had on each mode. The miles travelled by mode was determined by multiplying the total miles travelled during the Pilot Program with quarterly survey responses to the question "If an e-scooter/e-bike was not available what mode of transportation would you have used instead?". This was combined with CO_2 emissions assumptions to estimate CO_2 savings.

Figure 22. Estimated CO2 Savings by Mode

Mode	Percent Responses	Miles Travelled (est)	CO2 Emissions (grams/mile)	CO2 Savings (tons)
Walk	48%	4,032,687	0	0
Ride hail	21%	1,790,746	593.88[11]	1,063.5
Drive alone	12%	977,948	404[12]	395.1
Public transit (bus)	6%	529,992	290[13]	153.7
Personal bike	4%	294,680	0	0
Public transit (rail)	2%	164,071	163[13]	26.7
Metro Bike Share	2%	152,197	0	0
Taxi	2%	145,721	593.88[11]	86.5
Carpool/vanpool	2%	139,085	100	13.9
Other	2%	137,085	202[14]	27.6
Motorcycle/moped	1%	52,891	404[12]	21.3
Carshare	0%	34,541	404[12]	13.9
TOTAL	--	8,451,803	--	1,802

11 https://www.ucsusa.org/sites/default/files/2020-02/Ride-Hailing%27s-Climate-Risks.pdf
12 https://www.epa.gov/greenvehicles/greenhouse-gas-emissions-typical-passenger-vehicle
13 https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/PublicTransportationsRoleInRespondingToClimateChange2010.pdf
14 https://iopscience.iop.org/article/10.1088/1748-9326/ab2da8

CO2 Impact of Micromobility Cont.

Nearly half the trips taken on dockless vehicles during the Pilot Program replaced walking trips. However, nearly a third replaced high-emissions, single-occupant car trips or ridehailing trips. Using a value of 202 g/mi of life cycle CO_2 emissions for each electric scooter mile traveled,[15] the manufacturing, charging and rebalancing of dockless vehicles emitted approximately 1,707 metric tons of CO_2, a savings of approximately 95 metric tons of CO_2 (5%).

There are inherent limitations to this analysis, including key assumptions that customers who would have used all other modes of transportation would have traveled average trip distances. Using an average trip distance therefore may underestimate the emissions benefit, as it is more plausible that walking trips, for example, would be shorter than average, while car and ridehailing trips would have replaced longer dockless vehicle trips.

15   https://iopscience.iop.org/article/10.1088/1748-9326/ab2da8

Access to Transit

Electric scooters and bikes can enhance the existing transit system by strengthening connections to nearby transit stops and mobility hubs. However, both survey and ridership data showed that people rarely used dockless vehicles as a first/last mile ride to transit. Only 5% of survey respondents accessed their electric scooter or bike after a bus or rail trip.

This does not account for how essential dockless mobility became for many regular riders. While most trips did not provide first or last mile transit access, frequent users are much more likely to use these services to access transit than infrequent users. Forty percent of frequent riders use dockless vehicles to ride to or from transit stops. This suggests that regular riders are integrating electric scooters and bikes into their daily commuting habits and finding new ways to connect to public transit.

According to MDS data, relatively few trips start or end at an LA Metro station: 7.9% of trips begin within approximately 100 meters of an entrance to an LA Metro station, and 6.4% of trips end within approximately 100 meters of an LA Metro station entrance. Of the top ten most common stations associated with micromobility trips, seven are in or adjacent to DACs.

OBJECTIVES ACHIEVED

▼ Safety	○	∴ Access	◐
Equity	○	♥ Quality of Life	○

TAKEAWAYS

01 **Mobility** 02 **Data-Driven** 03 Managed 04 Experimental

Figure 23. Distribution of trip starts and trip ends by proximity to transit stations

LA Metro Station	Percent of Trip Starts	Percent of Trip Ends	DAC (Y/N)*
Not near a Metro Stop	92.1%	93.6%	N/A
7th Street / Metro Center Station	1.4%	1.2%	N
Pershing Square Station	0.7%	0.6%	Adjacent
Hollywood / Highland Station	0.6%	0.6%	Adjacent
Hollywood / Vine Station	0.5%	0.4%	Y
Wilshire / Vermont Station	0.5%	0.4%	Adjacent
Wilshire / Western Station	0.5%	0.3%	N
Pico Station	0.3%	0.3%	Adjacent
Wilshire / Normandie Station	0.3%	0.3%	Adjacent
Expo / Bundy Station	0.3%	0.2%	N
North Hollywood Station	0.3%	0.2%	Y
All Other Metro Stations	2.5%	1.9%	N/A

Adjacent indicates that the Station is on a border between DAC and non-DAC areas.

The 7th Street / Metro Center Station was the most common point of connection for transit access trips. Riders primarily dropped off and picked up micromobility devices along 7th St. and S. Figueroa St. near several of the main entrances to the station. Trips beginning at an LA Metro station are less likely to occur on weekends. This is consistent with less frequent LA Metro service during these times.

Given that intermodal connections to and from transit are low, more incentives may be needed to encourage electric scooters and bikes as a first/last-mile trips to major transit hubs.

Figure 24. Trip Start Activity in September 2019 From LA Metro Rail Stations
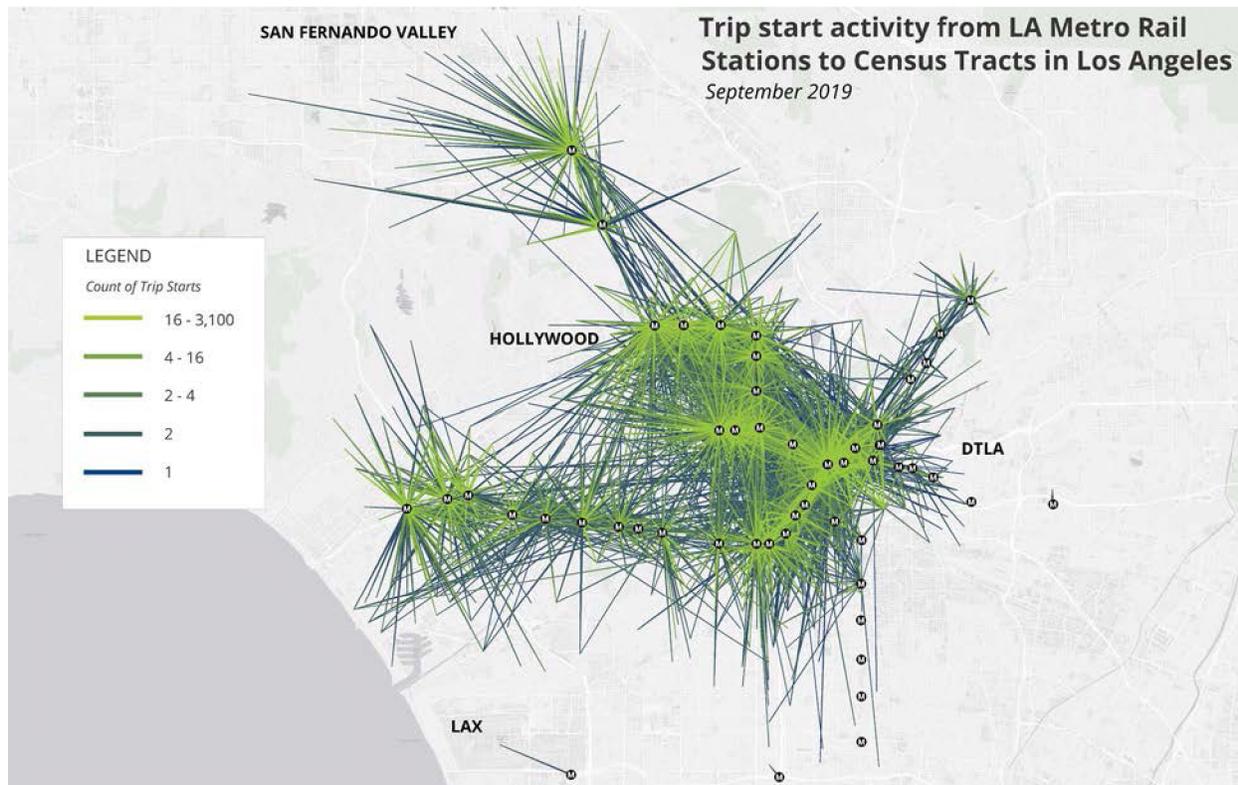
Dockless vehicles are used to access Metro rail stations as first and last mile solutions. Note that the image shows additional variability in scooter length and distance of usage across Los Angeles. The heatmap shows aggregated trips originating from the LA Metro Rail Stations to census tracts in LA. Each census tracts are shown as points of the center of census tracts.

Figure 25. Trip start and end activity density outside 7th Street/Metro Center station entrances

Snapshot of vehicles parked outside of Metro station entrances. By understanding the distribution of vehicles, LADOT can apply targeted digital parking policy.

05

The Issues and Opportunities

The Dockless Vehicle Pilot Program showed how electric scooters and bikes can bolster LADOT's vision for a mobility system that is safe, equitable, accessible, and supportive of people's quality of life. The pilot demonstrated LADOT's capacity to create flexible regulatory frameworks to evaluate new mobility services. The pilot surfaced ongoing challenges and lessons that inform the Year 2 program and other future mobility permit programs.

Affordability and Equity Measures

Cities have approached equity for shared micromobility from two angles: access to the services and availability of the vehicles. LADOT requires dockless micromobility operators to include an Equity Plan in their applications to outline how they will ensure access to their systems for those without a smartphone, those who may be unbanked or without a credit card, and those who are considered low-income. The Equity Plan requirements aimed to address financial barriers to dockless services.

Each operator had to present a plan to handle the following three challenges to:

1. Offer a cash option, non-smartphone option, and a low-income plan

2. Waive any hold deposits and provide unlimited free trips under 30 minutes for low-income customers

3. Verify low-income status

Source: Streetsblog LA

OBJECTIVES ACHIEVED

▼ Safety	○	⁙ Access	◑
👥 Equity	◑	🤍 Quality of Life	○

TAKEAWAYS

01	02	03	04
🛴 **Mobility**	📊 *Data-Driven*	📋 *Managed*	⚗ **Experimental**

Operators addressed these challenges by providing unlimited rides under 30 minutes for a monthly subscription fee. Operators required proof of enrollment in a local, state, or federal assistance program to establish eligibility. Operators offered a variety of alternative payment options for unbanked users and provided either an SMS text or call-in option to unlock rides for users without access to smartphones. As of January 2020, there were a total of 2,898 low-income plan enrollments across all operators. Lime had the greatest number of enrollments (957) followed by Bird (936) and Lyft (494). Although enrollment increased over time, more can be done to expand awareness of equity programs. Equity requirements were also limited to addressing income-based factors.

Figure 26. Summary of Dockless Operator Equity Plans

Operator	Low-Income Program (and verification process)	Cash Payment	Non-Smartphone	Additional Program Features
Bird	Bird Access offers service for $5 a month. Allows unlimited rides of 30 minutes or less. Open to those eligible for a state or federal assistance program.	Accept pre-paid debit cards.	SMS text to unlock available.	• App in several languages. • Bilingual marketing materials. • Multilingual customer service. • Military Service Members and Veterans program.
Bolt	Bolt Forward offers 50% off all rides "for those that qualify."	Can add to account with a check or money order.	SMS text to unlock available.	---
Jump	JUMP Boost offers service for $5 a month. Allows 60 minutes of free ride-time every day. Open to those who use Supplemental Nutrition Assistance Program (SNAP) benefits and other local and state benefit programs.	Cash payments through PayNearMe for older models. Can use Uber gift cards.	Call to unlock for non-smartphone access.	---
Lime	Lime Access offers a monthly subscription. Allows unlimited rides of 30 minutes or less. Open to those who qualify for any financial assistance program.	Cash payments through PayNearMe.	SMS text to unlock available.	---

Operator	Low-Income Program (and verification process)	Cash Payment	Non-Smartphone	Additional Program Features
Lyft	Lyft's Community Pass program offers service for $5 a month. Allows unlimited rides of 30 minutes or less. Open to those enrolled in or eligible for a state or federal assistance program such as Medicaid, SNAP, the Low-Income Fare is Easy (LIFE) program, or a discounted utility bill.	Accept pre-paid debit cards.	Call to unlock for non-smartphone access during services hours.	---
Sherpa	Sherpa's low-income program offers a monthly subscription. Allows unlimited rides of 30 minutes or less. Open to those eligible for a state or federal assistance program.	Accept pre-paid debit cards.	SMS text to unlock available	• App in several languages. • Bilingual marketing materials. • Multilingual customer service.
Spin	Spin's low-income program offers a monthly subscription. Allows unlimited rides of 30 minutes or less. Open to those eligible for a local assistance program.	Spin Access cards can be purchased for cash payments.	SMS text to unlock available.	---
Wheels	Wheels for All offers a monthly subscription. Allows unlimited rides of 30 minutes or less. Open to those enrolled in or eligible for a state or federal assistance program.	Cash payments accepted through promotional cards at partner locations.	Call to unlock through a reservation system.	---

LADOT required operators to submit a community engagement plan and to report on their efforts quarterly. Most operators hosted meetings and events with community-based organizations, non-profits, business improvement districts, and neighborhood councils throughout the Pilot Program. A few went further in their efforts.

Bird tabled at several public events to provide educational and safety materials, lead vehicle demonstrations, and show people how to use MyLA311. Lime led community education and awareness events and established a program that allowed riders to donate a portion of their trip costs to a local organization. Lyft partnered with several community-based organizations to launch local initiatives. Spin had a street ambassador program to sign up new riders, answer questions, and gather feedback. Spin used various social media platforms to engage with riders on best practices for parking.

The operators have varying levels of experience in community engagement. In the future, LADOT expects companies to invest resources and work with community-based organizations to encourage activity. This partner-based approach might include coordination with LADOT to enable more targeted outreach and improve engagement outcomes.

Source: Joe Linton /Streetsblog LA

Fleet-Based Incentives

In addition to providing an Equity Plan, LADOT created an incentive program to encourage operators to deploy vehicles in Disadvantaged Communities (DAC). DACs refer to areas throughout California that most suffer from a combination of economic, health, and environmental burdens. DACs are determined by the California Office of Environmental Health Hazard Assessment using CalEnviroScreen Version 3.0, a screening tool based on a climate index that incorporates factors such as potential exposure to pollutants, socioeconomic factors, and prevalence of certain health conditions.

The intent of the fleet-based incentive was to incentivize vehicle availability in low-income communities of color. Operators deploying in DACs that scored above the 75th percentile as defined by CalEnviroScreen 3.0 got an additional 2,500 vehicles, and operators deploying in DACs within the San Fernando Valley could gain an additional 5,000 vehicles, all for a discounted per vehicle rate. Although several operators initially committed to deploying in DACs, average monthly deployment in DACs fell precipitously during the pilot and never achieved its potential.

OBJECTIVES ACHIEVED

▼ Safety	○	∴ Access	○
Equity	○	♥ Quality of Life	○

TAKEAWAYS

01 Mobility   **02** Data-Driven   **03** Managed   **04** Experimental

DACs may serve as an appropriate analytical framework for other types of environmental, public health, and equity assessments, however, requiring a percentage of total fleet in large geographies does not guarantee access, nor does it address the unique mobility needs of the people that live there. A new equity zone designation is needed that more accurately reflects the geography of mobility need, displacement risk, and other racial equity measurement criteria.

Figure 27. Demographic Distribution in DACs

Education
Percent of population > 25 with less than a high school education

LEGEND
- 0% - 15%
- 15% - 30%
- 30% - 45%
- 45% - 60%
- 60% - 75%

Housing Burden
Percent of housing burdened low income households

LEGEND
- 0% - 12%
- 12% - 24%
- 24% - 36%
- 36% - 48%
- 48% - 60%

Linguistic Isolation
Percent limited English speaking households

LEGEND
- 0% - 14%
- 14% - 28%
- 28% - 40%
- 40% - 54%
- 54% - 68%

Unemployment Percentage
Percent of the population over the age of 16 that is unemployed and eligible for the labor force

LEGEND
- 0% - 15%
- 15% - 30%
- 30% - 45%
- 45% - 60%
- 60% - 75%

Poverty
Percent of the population living below two times the federal poverty level

LEGEND
- 0% - 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- 80% - 100%

Pollution Burden Score
Pollution Burden variable scaled with a range of 0-10 (CES 3.0 Score)*

LEGEND
- 0% - 2%
- 2% - 4%
- 4% - 6%
- 6% - 8%
- 8% - 10%

CalEnviroScreen identifies California communities by census tract that are disproportionately burdened by, and vulnerable to, multiple sources of pollution.

Figure 28. DACs vs. non-DACs

Non-DAC
SFV DAC
Non-SFV DAC
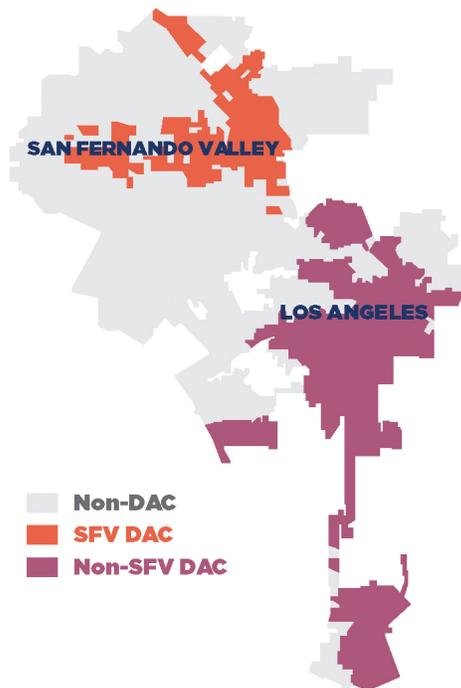
DAC designations and fleet incentives did not ensure equitable access to dockless vehicles. Deployment volumes within SFV DACs were significantly lower than those for non-SFV DACs and for non-DACs throughout the Pilot Program. During peak deployment periods, non-DACs altogether had 42% greater deployment volumes than non-SFV DACs, and over 95% greater deployment volumes than SFV DACs. LADOT has undertaken a deeper look at concentrations of mobility need and how to ensure disadvantaged communities have reliable access to mobility programs in the future.

- Although we require operators to provide equity programs to low-income users, according to the LADOT user survey results, 85% of riders are not aware of them. Many operators work with Council Offices and community-based organizations to promote and solicit enrollment in equity programs. However, most operators have limited staff dedicated to overseeing all outreach activities for the entire Los Angeles market.

- Equity Plan requirements do not consider vulnerable populations outside of those who are low-income, unbanked, and/or do not have smartphones. Among those left out are people that may face barriers to access such as older adults and people with disabilities. LADOT can work with operators to ensure that the program provides access for all, including those facing mobility challenges.

- In terms of operator responsiveness to constituent complaints, operators were most responsive to MyLA311 service requests in non-SFV DACs, which includes Downtown LA. The average response time in non-SFV DACs was 8.9 hours while the average response time in non-DAC areas was 11.6 hours. Of note, the SFV DACs had the smallest fleet size but saw the longest average response time with 12.8 hours. Average response times are skewed by service requests that have higher average response times than most other service request types (e.g. device in the Venice Canals). LADOT may consider implementing an issue-dependent, tiered SLA framework for MyLA311 dockless service requests.

Rider Behavior & Safety

Pilot data reveals that dockless vehicles, overall, represent a safe transportation option for Angelenos. The Dockless Vehicle Pilot Program experienced no deaths[16] across 10.3 million trips between April 2019 and March 2020. While this advanced LADOT's Vision Zero initiative, the program can do more to educate riders to improve safe riding behavior and ensure vehicles are safe and well-maintained.

- The Los Angeles Police Department issued 1,316 citations related to electric scooters and e-bicycles as of March 15, 2020. Roughly 85% of those citations were for sidewalk riding.[17]

- A total of 339 scooter-related emergency medical incidents were reported from March 2019 (when operators were first issued permits) to February 2020. Seventy-two percent of these incidents resulted in visits to the emergency room.[17] Incidents peaked in the summer from June to August and then diminished, which is reflective of higher ridership during these months and higher ridership by less experienced riders.

- A total of 407 scooter-related collisions were reported from 2019 through March 15, 2020.[18] Almost 80% of scooter-involved collisions involved drivers while 3% involved a person walking. Although no collisions were fatal,[19] 11% lead to severe injuries, while 43% resulted in a visible injury.

OBJECTIVES ACHIEVED

Safety ◖ **Access** ○

Equity ○ **Quality of Life** ○

TAKEAWAYS

01 Mobility 02 **Data-Driven** 03 Managed 04 **Experimental**

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16   Section 21235(g) of the California Vehicle Code states that the operator of a motorized scooter shall not operate a motorized scooter upon a sidewalk, except as may be necessary to enter or leave adjacent property.

17   Compiled from weekly scooter incident reports from the Emergency Medical Services Bureau of the Los Angeles Fire Department.

18   LAPD scooter-involved traffic collision YTD stats for 2019 and 2020. Collision data is aggregated based on vendor, LAPD Division Breakdown, and types of collision. Based on this aggregation, the analysis is unable to attribute factors (e.g. proximity to bicycle infrastructure, vehicle speed limits, time of day, etc.) that could further contextualize collision trends.

19   LADOT is aware of one fatality in Hollywood involving a pedestrian who was riding a scooter just prior to the collision. LAPD did not classify this as a scooter collision under their current reporting system, but LADOT's Dockless program managers worked with Vision Zero Core Team to discuss prevention strategies in the area following the collision.

While LADOT posts the City's parking and safe riding rules on the program website and operators include in-app safety info, rider knowledge varies. Less than three-quarter of riders (67%) know that a valid driver's license is required to ride an electric scooter or bike. Less than half of riders know that riding is prohibited on the Venice Beach Boardwalk (47%) and/or the Venice Ocean Front Walk (45%).

Even when riders know the rules, their behavior might not reflect their understanding of the rules. While the majority of riders (82%) know not to ride on sidewalks, a third of riders still prefer to ride off-street on sidewalks.

The vast majority of MyLA311 service requests were parking related. Seventy-nine percent complained of improperly parked vehicles and 10% complained of vehicles parked on private property.

Rider safety education is a shared responsibility between LADOT and the permitted operators, requiring ongoing accountability on both ends. LAPD is in charge of enforcing rider infractions.

Figure 29. Rider Awareness Knowledge of Safe Riding Rules[20]

Safe Riding Rules	Percent of Awareness
No riding on sidewalks	82%
Must obey the rules of the road	81%
Must be at least 18 years of age	68%
Must have a valid driver's license	67%
Helmets are required	48%
No riding on the Venice Beach Boardwalk	47%
No riding on the Venice Ocean Front Walk	45%

LADOT and Council Offices have been working with LAPD to enforce and reduce sidewalk riding. The face value of a sidewalk-riding citation is $197. Between January and mid-July, LAPD issued 800 tickets to electric scooter users and cited them for more than 900 violations, ranging from sidewalk riding to riding without a valid license. Approximately two-thirds of the violations involve sidewalk riding. LAPD conducted several enforcement stings targeting sidewalk riding as part of the City's efforts to reduce collisions and injuries. More coordination between LADOT and LAPD can evaluate the efficacy and scalability of sidewalk riding citations and to address the potential equity concerns related to enforcement and policing in communities of color and low-income areas.

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20   Quarterly Rider Survey (May-December 2019)

Vendor Operations & Pilot Experimentation

LADOT adopted a spirit of testing and collaboration and sought out opportunities to learn with operators throughout the permit period. Experimentation allows us to test new tools, reveal deficiencies, identify performance metrics, and shape policies that work for Los Angeles. LADOT has piloted several digital policies for micromobility in small geographic areas to understand their impacts and how they might apply to the broader citywide context. Examples of experimentation include the SOZs, event management, auditing and technical compliance.

OBJECTIVES ACHIEVED

Safety ◑   Access ○

Equity ○   Quality of Life ◑

TAKEAWAYS

01 Mobility   02 Data-Driven   03 Managed   04 Experimental

Auditing and Technical Compliance

Inspection and auditing establish the facts needed for regulatory action, incentives, and rewards. Measurable, or auditable, compliance is essential for the dockless program because it establishes certainty that operators are complying with policy. This method provides an objective, evidence-based foundation for rewarding or penalizing operators.

LADOT created several regulatory enforcement tools to support the auditing process. With these tools, City employees can check each device to ensure that the device's real-world status and position are accurately reflected in MDS. These tools enable City employees to monitor and assess operator compliance to SOZ regulations and parking requirements.

Technical compliance refers to adherence to MDS data reporting requirements. In November 2019, LADOT discovered that most vehicles found in the public right-of-way were correctly reflected in MDS. The department discovered that the status of more than 30% of vehicles from one mobility operator were inaccurately reported in MDS. Other audit trips have revealed new, unregistered devices in the public right-of-way. LADOT communicated discrepancies to operators and were able to verify compliance and correction, resulting in thousands of vehicles being represented correctly in MDS.

Public and Private Event Management

Events are a major source of electric scooter and bike demand and create potentially significant operational challenges. The non-profit organization CicLAvia hosts community events multiple times per year, which requires entire streets and intersections to be closed to motorized traffic for the day. Though no cars or trucks are permitted, larger-than-usual volumes of people walking and biking, as well as children learning to bike create an environment where faster-moving vehicles (like electric scooters) can be disruptive.

During the pilot period, there were five CicLAvia events. To help ensure safety in these temporary pedestrian areas, LADOT established policies specifically for micromobility use. They included speed limits, prohibiting users from starting and ending trips, and prohibiting deployment of micromobility vehicles within a geographic area. LADOT identified the geographic area via a GIS tool and imported that into its MDS system thus creating a "geofence." LADOT codified the policy rules in MDS via a digital policy manager tool, and referenced the geofence. LADOT then communicated the policy and geofenced location to operators by email.

Once we published the policies to the companies, we measured compliance to the policy by counting the vehicles violating the geofence.

During the "Meet the Hollywoods" CicLavia event in August 2019, LADOT geofenced approximately fourteen City blocks. Four operators had scooters in the area, with over 200 devices in the immediate vicinity of the event. CicLavia draws tens of thousands of attendees and the combination of geofencing and direct communication between LADOT, operators, and event organizers allows partners to manage the impacts together.

Figure 30. Scooter Activity during CicLAVia – Meet the Hollywoods Event (August 2019)
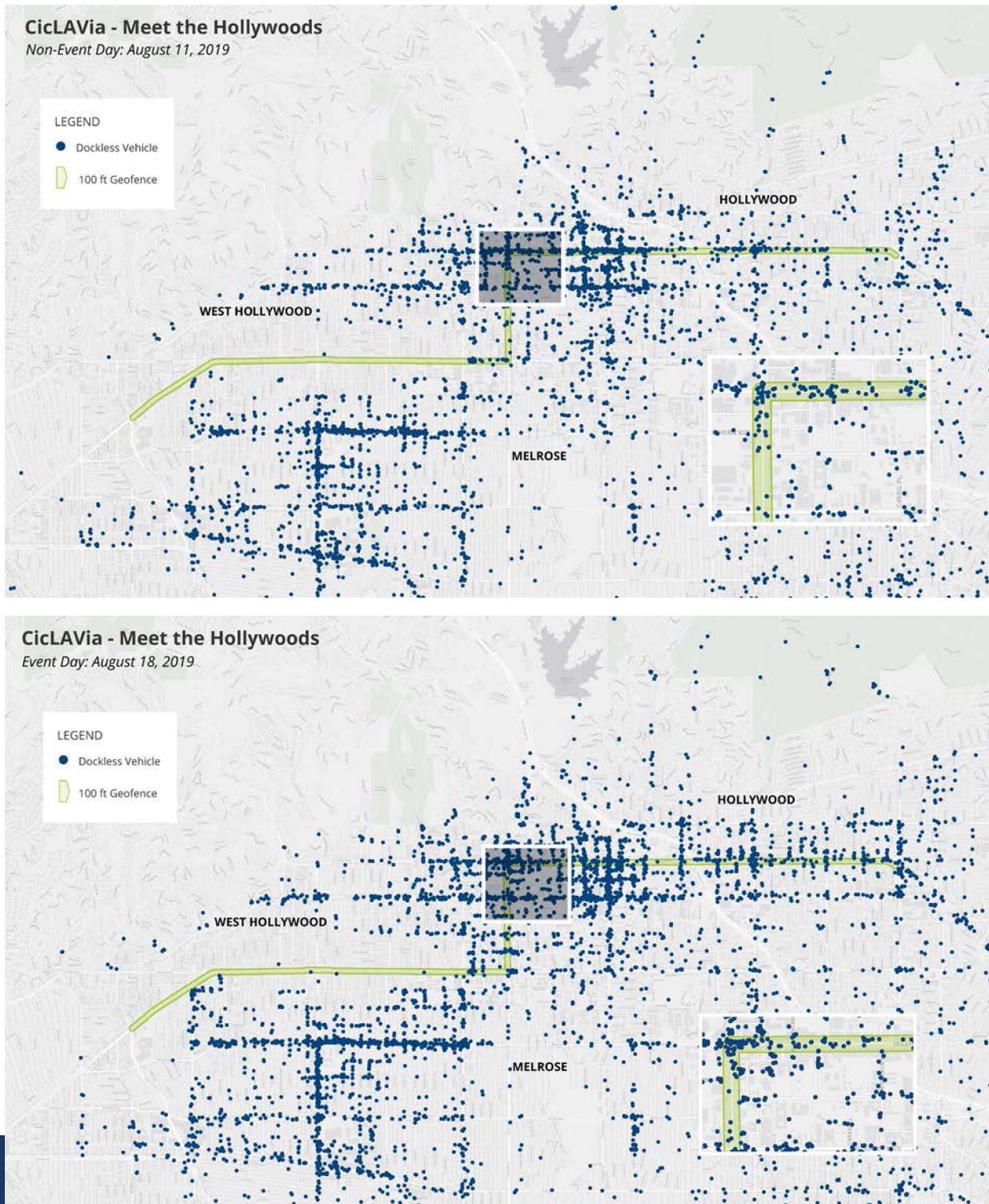
CicLAVia route map and locations of scooters locked in and around CicLAVia for Meet the Hollywoods event. This image shows a snapshot of trip ends between 9 am and 4 pm on event day, highlighting policy compliance.

Source: LADOT
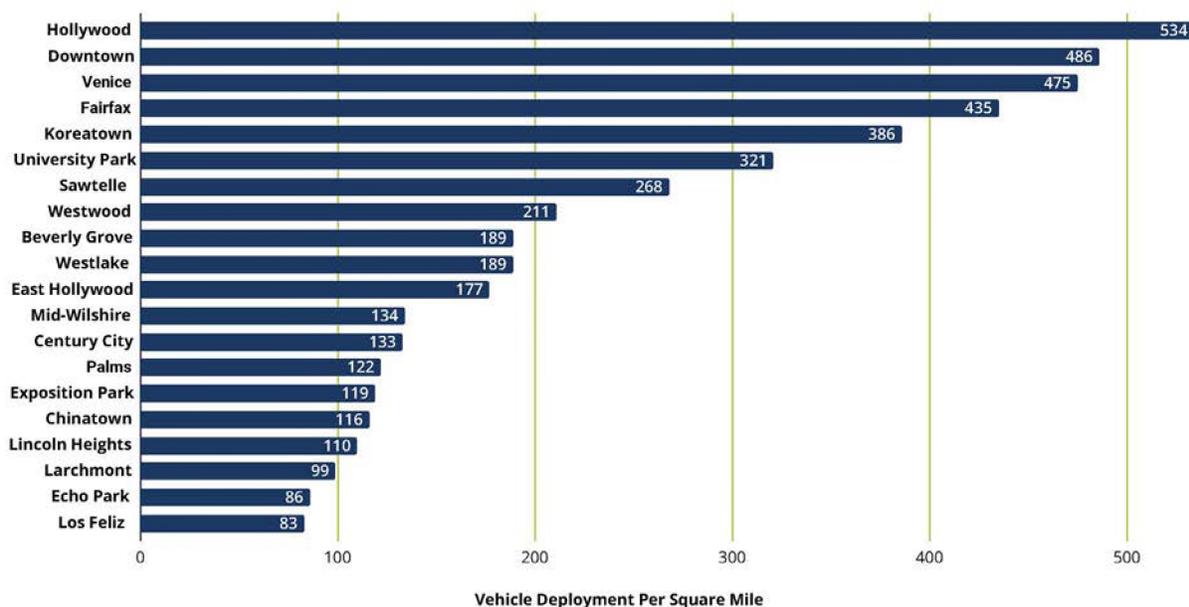
Special Operations Zones

In May 2019, LADOT established a Special Operations Zone (SOZ) in Venice in response to concerns related to oversaturated deployment, untidy parking, and conflicts between people riding dockless devices and people walking along the boardwalk. The Venice SOZ has served as the testing ground for piloting digital policies and enforcement mechanisms. Operators are limited to deploying at most five dockless mobility devices at each Drop Zone where space is available. LADOT determined Drop Zone locations based on perceived deployment hotspots. Our lessons learned from piloting digital policies like the Venice SOZ will inform the implementation of SOZs in other parts of the city.

LADOT staff, with support from Nelson\Nygaard and Ellis & Associates, conducted monthly audits to enforce SOZ policies. Operators that exceed the 5-vehicle cap or deploy vehicles outside of Drop Zones receive a warning followed by a temporary suspension of all operations within the SOZ. Operators were generally responsive to SOZ enforcement and were able to restructure operations to meet policy requirements. In several instances, LADOT suspended an operator from the Venice SOZ for seven days for violating deployment maximums. These data-driven enforcement actions led to improved compliance within the Venice SOZ.

Other regions of Los Angeles have been identified as potential sites for piloting digital policy applications. Similar to Venice, Downtown Los Angeles experiences high use of dockless mobility services, and an oversaturation of dockless vehicles. Lessons and best practices gleaned from the Venice SOZ experience can help to inform SOZ implementation in other parts of the City.

For example, the Hollywood Walk of Fame is a popular destination that, similar to the Venice boardwalk and beach path, experiences high pedestrian volumes and high utilization of dockless vehicles. As shown in Figure 31 below, electric scooter and bike deployments in Hollywood and Downtown Los Angeles were more dense than in Venice.

Figure 31. Dockless Vehicle Deployment Density

In April 2020 LADOT created a new Special Operations Zone policy with a geofence along Hollywood Blvd. from La Brea Ave. to Gower St. and along Vine St. from Sunset Blvd. to Yucca Ave. Operators were instructed that the following policies are to be implemented:

- Users are prohibited from reserving vehicles, starting trips, and ending trips within the SOZ

- Operators are prohibited from deploying vehicles, within the SOZ

- If a vehicle is found to be left in the SOZ, either through MDS or other notification (such as 311), operators are expected to pick up the vehicle within two hours of being dropped off

- Fully Motorized Vehicles are required to throttle down to 0 mph in the SOZ

Figure 32. Deployment of Dockless Vehicles on the Hollywood Walk of Fame Over Time Without Digital Policy Measures in Place
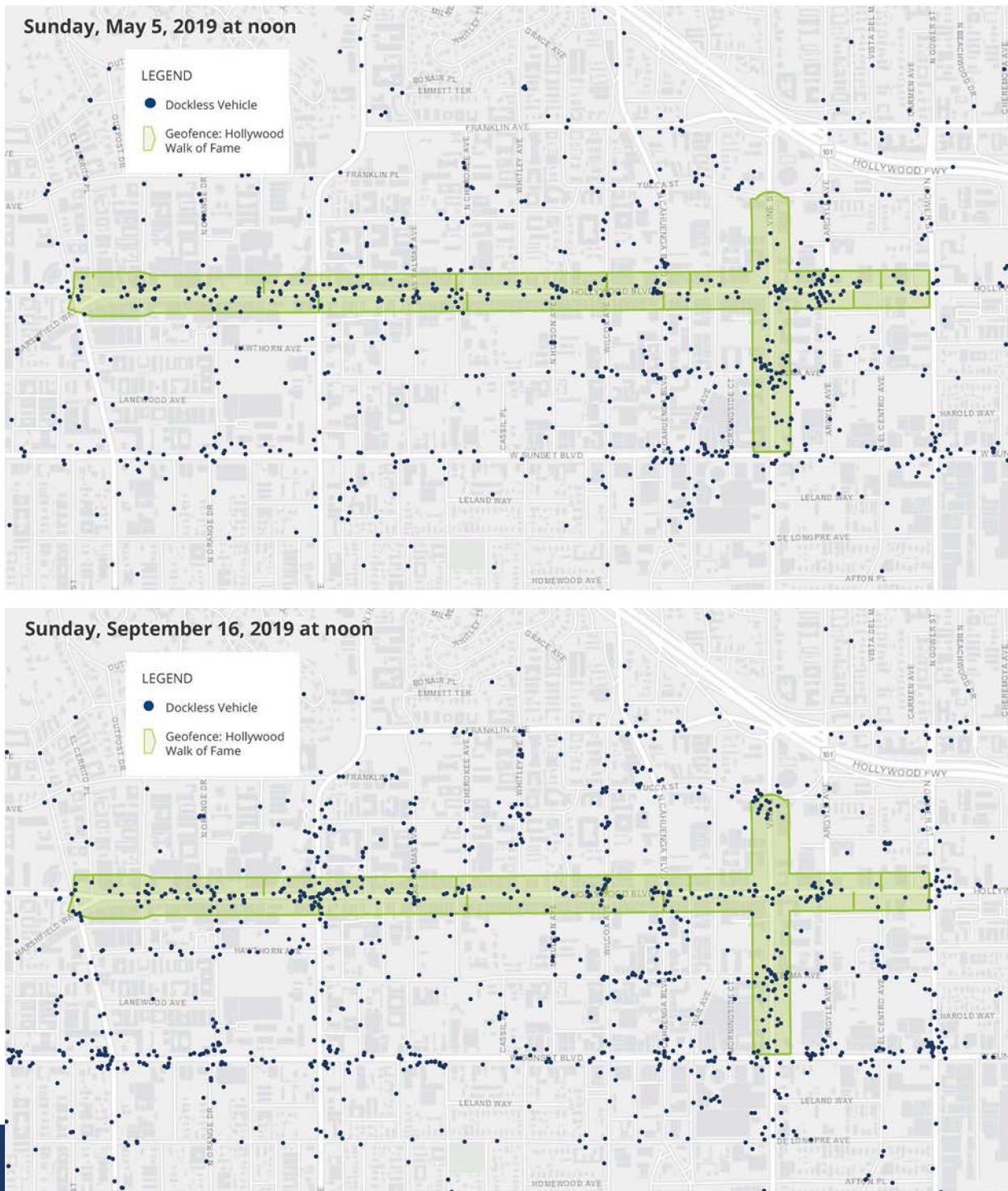
Similar to Venice Beach, the Hollywood Walk of Fame experiences high levels of tourist and pedestrian activity while sharing the same space with dockless vehicles.

Fleet Rebalancing

Dockless mobility experiences peak directional travel, which creates issues related to oversaturation in some neighborhoods and a lack of vehicle supply in others. Residents often travel in similar directions at similar times (e.g. travel to and from work or school). These travel patterns can lead to spikes in demand and shortages of mobility devices in some places and oversupply of devices in others. Operators deploy large numbers of operational staff to repair and recharge scooters, and these workers move vehicles from areas of oversupply to areas of higher demand.

An alternative way of looking at comparing supply and demand is evaluating where operators and customers take vehicles in the city. In most neighborhoods, the ratio of user vehicle trip destinations and operator vehicle drop-offs is balanced. However, some neighborhoods appear to have imbalance. Nearly 80% of scooters in Playa Del Rey were brought there by operators, while far more scooters were brought by users than operators in areas including Panorama City, north of North Hollywood, Chinatown, and near Jefferson Park.

OBJECTIVES ACHIEVED

| Safety | ○ | Access | ◑ |
| Equity | ◐ | Quality of Life | ◑ |

TAKEAWAYS

01 Mobility
02 Data-Driven
03 Managed
04 Experimental

Figure 33. Percenatge of Operator Drop Offs and Rider Trip Ends in DACs in the City of Los Angeles in September 2019
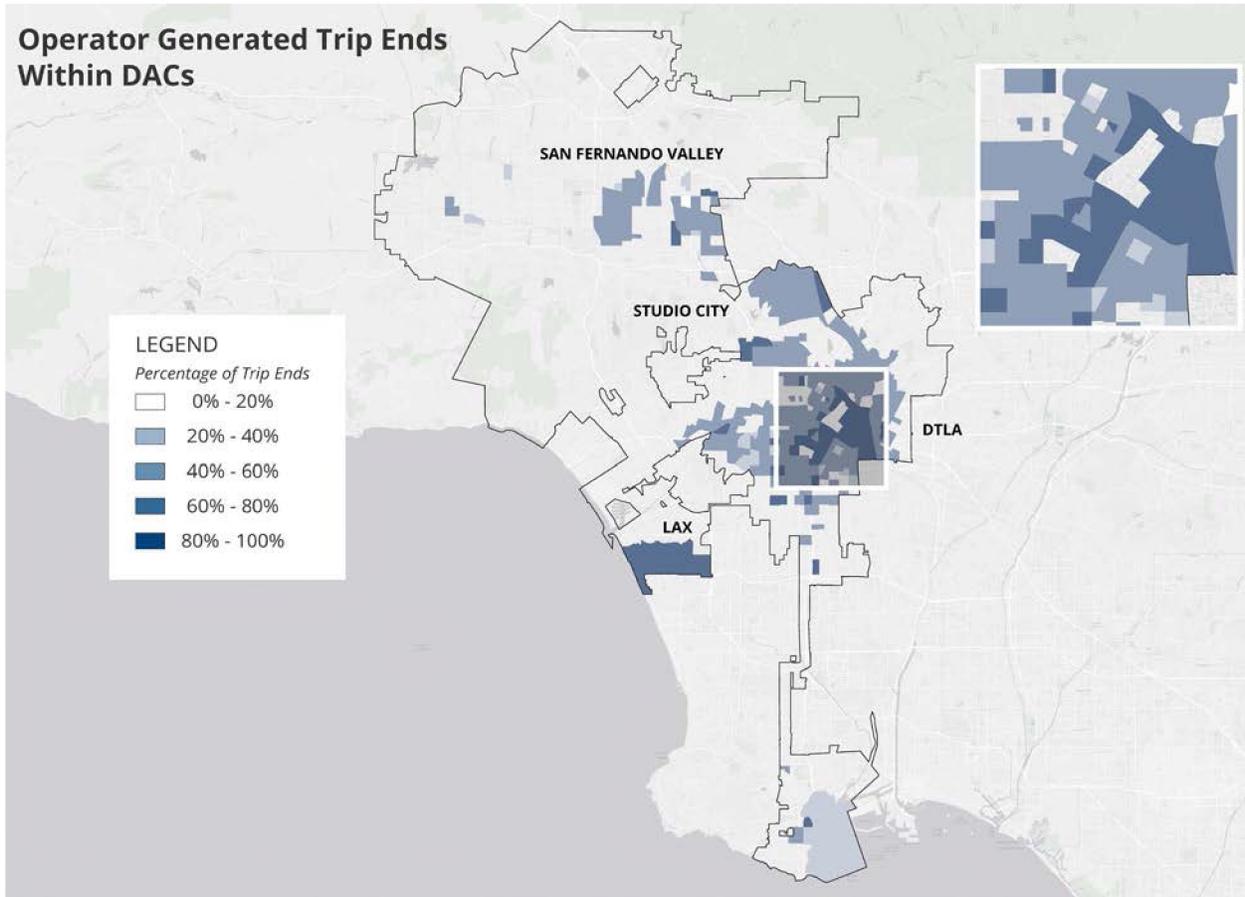

Figure 33 compares the arrival of devices in Los Angeles neighborhoods and the percentage of devices that were brought by users versus those that arrived via operator drop-offs.

Public Realm and Parking

When dockless electric scooters and bikes launched in Los Angeles, City Councilmembers and their constituents were concerned with oversaturation of abandoned vehicles and untidy parking. Vehicles that tip over or are obstructing travel paths might create accessibility challenges for people with physical, visual, and cognitive abilities while disrupting the public realm. LADOT audited parked vehicles to check for improper and obstructed parking. These audits found that:

- Nearly half of all audited devices were observed to be correctly parked in the amenity zone (47%) while 26% were parked within the pedestrian zone.

- One in five audited vehicles obstructed the pedestrian zone and failed to provide at least 6 feet of clearance.

- Seven percent of vehicles were observed to block access ramps and 8% of vehicles were tipped over.

OBJECTIVES ACHIEVED

Safety	◗	Access	○
Equity	○	Quality of Life	◗

TAKEAWAYS

01 Mobility 02 Data-Driven 03 Managed 04 Experimental

These values are similar to what has been observed in other cities,[21] indicating that LADOT's enforcement, education, and collaboration with operators were successful in achieving the outcomes Council directed. However, even one vehicle obstructing ADA access is unacceptable. Although operators have implemented in-app features that provide detailed parking instructions for users, additional efforts can expand user education around parking.

LADOT required operators to submit detailed parking plans outlining potential incentives and in-app features they can deploy to improve parking outcomes. While most operators delivered on their plans, the pilot was not structured or resourced to evaluate the effectiveness of the operator's parking plans. Greater collaboration between LADOT and operators can continue to identify a set of incentives that are appropriate to the Los Angeles market.

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21   During the first year of their pilot programs, Seattle DOT reported roughly 4% of all audited dockless bikes obstructed ADA access while the District Department of Transportation reported nearly 7% of all audited dockless vehicles were parked undesirably.

Operator Responsiveness

LADOT required operators to respond to all MyLA311 service requests within two hours, which means all service requests, including improper parking, illegal deployments, and broken devices carry the same weight. Between March 1, 2019 and March 22, 2020, LADOT received a total of 12,653 MyLA311 Dockless Mobility Service Requests.

- 68% of service requests were resolved within the required two-hour window.[22]

- Almost 90% of all service requests involved vehicles that were improperly parked or parked on private property. The least common violation type was

'Low Battery', which accounted for 0.2% of all service requests.

- Service requests involving unpermitted operators had the longest average resolution time at 41 hours while service requests involving vehicles parked on private property had the lowest average resolution time at eight hours.

- A majority of service requests were reported from non-DAC (84%) and non-SFV DAC areas (14%). These trends are reflective of deployment patterns where areas with higher service request volumes have a higher density of dockless vehicles.

OBJECTIVES ACHIEVED

⚠ Safety	◐	⬡ Access	○
🚶 Equity	○	🤲 Quality of Life	◐

TAKEAWAYS

01 Mobility	02 Data-Driven	03 Managed	04 Experimental

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22   Service requests involving 'Sidewalk Riding' were excluded from this calculation. Unlike other violations, 'Sidewalk Riding' service requests are not assigned to an operator and are immediately resolved after the service request is created. LADOT created this violation as a way to gauge general sidewalk riding behavior.

An opportunity is to modify MyLA311 response time requirements for violation types based on the volume of service requests. For example, service requests involving improperly parked vehicles may have a required response time of two hours while service requests involving abandoned vehicles in the Venice Canals may have a required response time of 24 hours. Shifting time requirements to a tiered system can help guide operators in prioritizing the most urgent service requests.

Residents have expressed concerns about the durability of vehicles. While not explicitly addressed here, MDS permits operators to deregister vehicles with a specific reason, including "decommissioned" or "missing" vehicles. In the future, these events could be used to evaluate the durability of vehicles and validated with audit data collected in the field.

06

The Future of On-Demand Mobility

The Pilot Program achieved many positive outcomes, while it fell short on others that will require new policies, protections, and partnerships. What is indisputable - shared electric scooters and bikes demonstrate potential to become a vital mobility option for Angelenos. People are taking trips—the most trips of any dockless mobility program in North America—and many of those trips are replacing the use of cars and ridehail.

The development and use of Mobility Data Specification (MDS) data was essential to manage permitted fleets and monitor company performance. Without access to trip and vehicle status data governed by MDS, our program decisions and direction for Year 2 would rely on guesswork and prediction. We are looking to lessons learned about enforcement, equity, privacy, and mobility to guide Year 2 recommendations.

Disadvantaged Community (DACs) designations and fleet incentives aimed at operators did not ensure access to dockless vehicles across LADOT's many diverse communities. Likewise, the program's current Equity Plan requirements did not fully address the range of barriers to accessing dockless services, such as geographic, technological, financial, and cultural barriers. Additionally, the requirements fail to consider other vulnerable populations that may face barriers to access, such as older adults and persons with disabilities. The role of potentially discriminatory rider enforcement in Black, brown, and immigrant communities remain a critical consideration. The shared goal of LAPD and LADOT is that companies communicate rules clearly to riders and play an education role to assist in reducing the conflicts between riders and others in the public right-of-way.

In the advent of the COVID-19 pandemic, dockless mobility is an important mobility option that can offer redundancy when public transit is not available—particularly for those essential workers that need reliable and on-demand transportation.

LADOT learned vital lessons about dockless mobility, the way the private mobility industry operates and serves the mobility needs of Angelenos, and the data necessary to engage with these services. In the years to come, we will take the program in several new directions.

Delivering On-Demand Mobility – in all its various forms.

01 | Delivering On-Demand Mobility – in all its various forms.

In Year 1, the Dockless Mobility Pilot Program served as a proving ground for shared, electric, small vehicle transport—primarily in the form of dockless scooter and bike share providers. However, the mobility ecosystem is rapidly evolving with new modes, new product features, and new ways to get a vehicle when you need it. We seek to build a program that uses a wide lens—beyond vehicle types and business models currently on the market.

Given the range of potential micromobility solutions that could expand mobility options for Angelenos, LADOT will **rebrand the program to On-Demand Mobility Program** and enable a broader set of shared micromobility services that span:

- Dockless, dock-based, and hybrid parking models;

- Different vehicle types and form factors less than 1,000 pounds; and

- Different operating models, such as subscription-based fleet services to employers, direct to consumer monthly rentals, and even goods delivery.

Shifting toward the On-Demand Mobility Program will engage a broader ecosystem of shared micromobility services that is in service of public mobility objectives. Under this branding, LADOT will look to council to approve regulations appropriate to different modes. For example, mopeds may require a driver's license and have separate insurance requirements. Eventually, LADOT's goal is to pull all permitted programs under the oversight of the for-hire transportation team. This framework will enable a more rapid and responsive expansion of new modes and services to give residents a larger set of options to get around.

The commonalities between different technologies suggests that certain policies and regulations can apply across the shared mobility service spectrum irrespective of mode type.

We are in the midst of establishing **a universal permit program** for for-hire vehicles and we plan to transition dockless and all other forms of on-demand mobility into this broader permitting framework. This strong regulatory framework can hold companies accountable for delivering desired program outcomes. At the same time, regulations should be flexible enough to enable the entry of new mobility service models.

Refined outcomes for the On-Demand Mobility program.

02 | Refined outcomes for the On-Demand Mobility program.

LADOT will deliver the On-Demand Mobility program and other mobility programs that operate in the public right-of-way based on clear objectives. The On-Demand Mobility program will align program actions, compliance and enforcement, and daily operations against our overarching goals and outcomes established in the Strategic Plan, Vision Zero Mayoral Executive Directive, LA's Green New Deal, and the Technology Action Plan.

The On-Demand Mobility program's new program objectives include:

Healthy, transparent, and equitable

Give Angelenos more accessible transportation choices. Empower impacted communities to participate in transparent decision making. Reduce racial and social inequities. Improve mental and physical health outcomes.

Safety-focused

Lead with safety. Imbed neighborhood needs in permit requirements and service provider accountability metrics.

Clean and resilient

Give those who are able options to drive less and use clean transportation options for short trips.

Open marketplace

Create local jobs. Foster competition and innovation in an open marketplace. Regulate to reward good actors.

New Direction 03

A nuanced focus on mobility equity.

03 | A nuanced focus on mobility equity.

To correct policies and program features that failed to meet expected equity outcomes, LADOT will establish a mobility equity framework. This framework will influence policy and mobility programs beyond On-Demand Mobility. The six equity principles that emerged from the Dockless Vehicle Pilot Program's Core Advisory Board (CAB), public agency leaders, and community-based organization (CBO) representatives will comprise the framework. The following equity principles build off of established frameworks developed by the Greenlining Institute and the Government Alliance on Race and Equity (GARE).

1. Correct past inequities and be transparent about how you do it
2. Start with race
3. Recognize how transportation needs intersect with other needs
4. Push toward true inclusion
5. Center historically oppressed voices and communities first
6. Value community knowledge as real expertise

The sections below highlight some of the key directions that LADOT will take to reset the On-Demand Mobility program and better address inequities and the mobility needs of communities of color.

From DACs to Nuanced Equity Zones

Setting operational requirements and incentives against the Disadvantaged Communities (DACs) designation in Year 1 did not guarantee access to scooters and bikes, nor did it address the unique mobility needs of the people that live there. LADOT will establish new designations that more accurately reflect the geography of mobility needs, displacement risk, and other racial equity factors in Los Angeles. The new equity zone designations consist of the following tiers:

- **Mobility Equity Zones (MEZ):** Areas that are transportation disadvantaged and meet the Hardship Index developed by the Nelson A. Rockefeller Institute of Government as a filter for socio-demographic vulnerability. Transportation disadvantaged refers to areas that have transportation deficiencies, which include a lack of access to transportation options (based on frequency of transit, level of traffic stress on major streets, and generalized travel cost based on travel time), and crash safety risks.

- **Mobility Disadvantage Zones (MDZ):** Areas that are transportation disadvantaged but do not meet the Hardship Index.

MEZs and MDZs (as shown in Figure 34) will be updated regularly to ensure program decisions and policies are based on the most current data and reflect how areas of transportation disadvantage change over time.

Figure 34. Mobility Equity Zones and Mobility Disadvantage Zones

EQUITY ZONES

Zone Type

- Non-Equity Zone Block Groups
- Mobility Equity Zone
- Mobility Disadvantage Zone
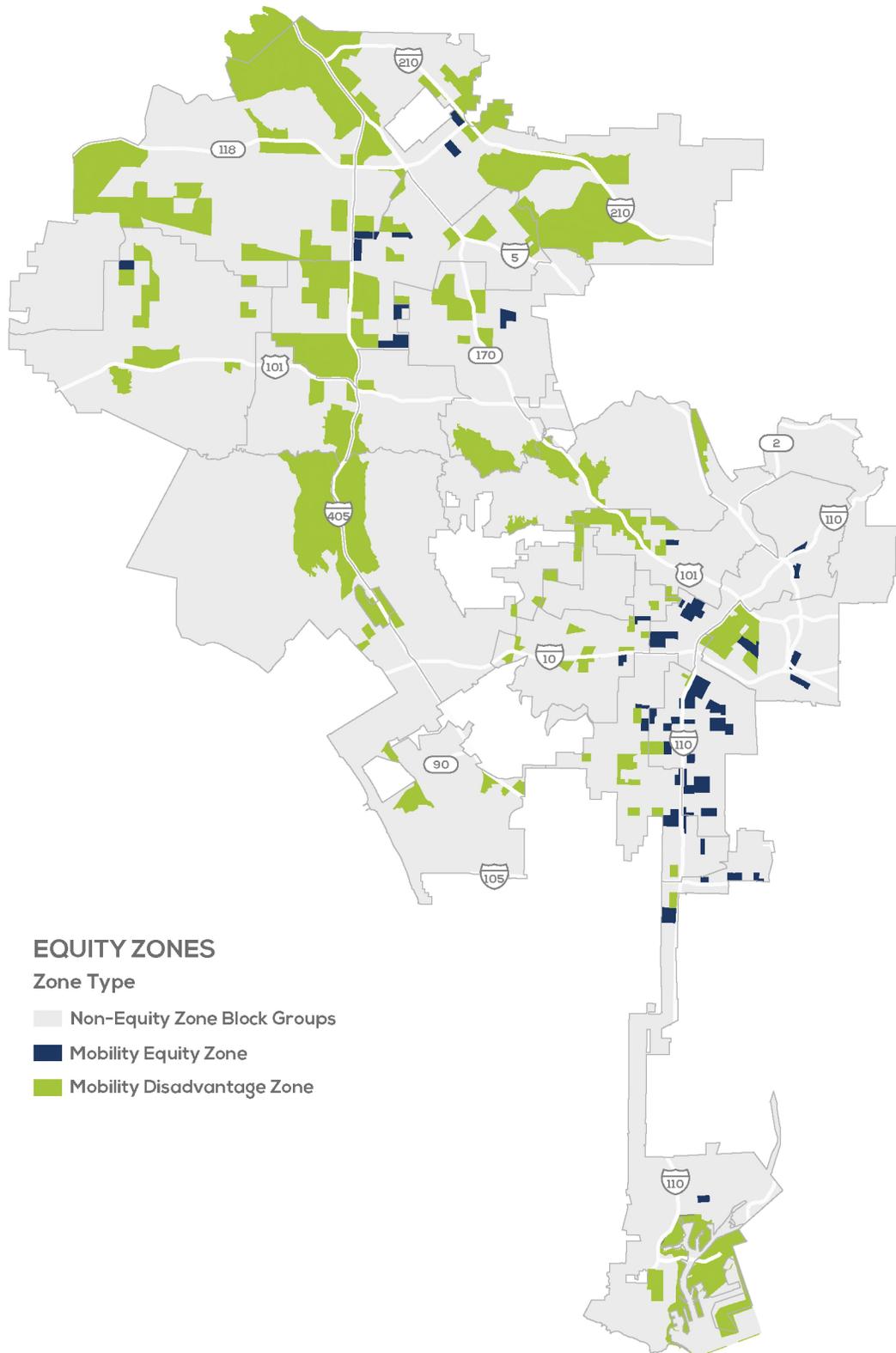
Price Capping for Equity Zone Trips

LADOT will establish a price cap for dockless trips that begin and/or end in an equity zone, with price caps varying by equity zone tiers. LADOT will require a lower price cap (no more than $1.25 for rides beginning and/or ending in MEZs and no more than $1.75 for rides beginning and/or ending in MDZs) to increase the affordability and accessibility of on-demand mobility, while mimicking the price of public transit fares.

Equity-Centered Program Requirements

LADOT will update permit requirements to better align on-demand mobility regulations with mobility access, enrichment, and anti-displacement outcomes. Some of the mobility equity program requirements that we will use to eliminate barriers to mobility services include:

- Daily deployment requirements and equitable distribution of vehicles in MEZs and MDZs;

- Consistent low-income subscription rates to eliminate customer confusion;

- Monitoring operator-driven strategies for increasing awareness of low-income programs within operator equity plans;

- Better reporting of the existing non-smartphone and cash payment options requirement; and

- New operator plans to engage with older adults and persons with disabilities.

We will continue to assess equity program enrollment to determine if and how they are addressing populations with limited mobility and accessibility.

Job Creation and Community-Based Operations

Los Angeles is a hub for mobility innovation, and we want to build long-term career prospects in this industry for unemployed and underemployed Angelenos. The On-Demand Mobility program will serve as a job creator, building full-time employment opportunities in the shared micromobility industry through new requirements and partnerships. LADOT will develop incentives to encourage operators to create full-time job opportunities and site their operations in an equity zone. Our aim is to shift the industry away from temporary independent contractor positions that do not guarantee a living wage or benefits.

In addition to building new job opportunities, LADOT will subsidize operations and maintenance support through third party contractors and/or non-profit CBOs using permit fee revenue. We will then support operators to match operations and maintenance needs with CBO placement opportunities. We will engage the CAB to determine and monitor the benefits or unintended negative impacts of this program requirement.

Inclusive Engagement and Transparency

LADOT plans to dedicate funding and resources towards a robust community engagement program that prioritizes populations with the fewest mobility choices. Engagement should integrate company-led engagement efforts. LADOT will continue engagement with the Core Advisory Board, expanding on its Dignity Infused Community Engagement model Connected to the spirit of openness and dialogue, LADOT will deliver new ways to transparently report on program performance for the On-Demand Mobility program.

LADOT will publish regular performance reports to increase transparency and accountability around program objectives, mobility data management, and equity outcomes, in particular. Similar to the approach taken in Minneapolis, LADOT will provide public access to aggregated MDS data on the City's Open Data Portal.

Digital policy, parking management, and public realm stewardship.

04 | Digital policy, parking management, and public realm stewardship.

Digital policies—and the Mobility Data Specification system that enables them—are critical tools to effectively and dynamically manage the public-right-of-way.

New MDS Functions and a Dynamic Regulatory Environment

MDS has successfully supported LADOT's Dockless Mobility pilot permit. However, new requirements and a dynamic operating environment will require LADOT to test and capitalize on greater functionality within the MDS environment. LADOT will establish digital policy thresholds for SOZs, various geofence types, drop zones, and temporary major events involving road closures, among others. We will also establish new features to ensure compliance on the equity-based price capping requirement and encode enforcement thresholds and penalty standards within MDS.

In Year 2, LADOT will document and formalize digital policies via MDS to allow for regulatory flexibility, making iterative changes to ensure geofences, speed controls, and deployment zones are meeting our management objectives as designed. We will formalize and streamline operations to ensure efficient program delivery. In Year 1, the language to communicate digital policy via email was ambiguous and informal. For example, some operators interpreted the language of the CicLAvia policy emails less strictly, which resulted in inconsistent implementation of digital policy features and geofencing (e.g., some providers only limited travel speeds by throttling down the motors of the scooters).

The "Lock-To" Option and Parking Zones

Cities like San Francisco and Chicago recently required lock-to functionality to ensure that parked scooters are not tipped over and do not block sidewalks, curb ramps, or crosswalks, while enabling traditional wheel locking where bike racks are not available. LADOT will require that all dockless on-demand vehicles be lock-to enabled, allowing for vehicles to lock to bike parking and other acceptable parking infrastructure. LADOT will continue to install bike parking racks citywide to enable an eventual requirement that dockless bicycles and scooters be locked when not in use.

We will establish parking zones to enable a mix of dockless, virtual "docking" at Drop Zones, and lock-to requirements to improve parking outcomes in different neighborhoods. We proposed the development of two parking zones, which we will communicate via MDS to companies:

- **Zone 1: Dockless + Drop Zones** — Parking within zones characterized by low dockless use and low availability of bicycle parking will continue as-is. Parking within zones characterized by medium to high dockless use and low availability of bicycle parking will receive Drop Zones paired with provider incentives that encourage users to park within Drop Zones.

- **Zone 2: Lock-to Zones** — Parking within zones characterized by high dockless use, relatively high pedestrian activity, and/or medium to high availability of bicycle parking will serve as test sites for lock-to. At first, test sites will be limited to two to three zones potentially at or around SOZs. While the ultimate intent is to establish mode-agnostic parking areas, lock-to will require an expansion of bicycle corrals and racks throughout the city, funded by On-Demand Mobility fee revenue.

On-Demand Micromobility Parking Program

After two years of experimentation, we understand that dockless mobility options need more choreographed parking, particularly in areas with high parking and deployment demand. Drop Zones helped reduce sidewalk clutter and improve user parking behavior in Downtown and Venice. However, LADOT will need to expand parking options and scale them across the city to better organize the public realm.

Given limited bicycle parking supply and the potential for thousands of devices locked to racks, LADOT will need to gradually phase in the lock-to requirement alongside the expansion of bicycle and other micromobility parking.

In addition to creating formal parking zones (see above), LADOT will develop an on-demand micromobility parking program to effectively manage, scale, and evaluate Drop Zones and other parking infrastructure across the city. The parking program will also include installation of bike parking and in-street parking corrals to support phasing-in the lock-to requirement. Micromobility parking will benefit people needing to park their personal or shared small vehicles. LADOT will manage geofenced Drop Zones, track incentives outlined in provider parking plans, and monitor whether and how providers include Drop Zones within their apps. We will also create a mechanism for businesses and property owners to propose and fund micromobility parking solutions.

Better MyLA311 Integration

Initially, LADOT sought to use the City's demand-responsive MyLA311 information system to connect service requests directly to operators. While this interim integration streamlined service requests, LADOT seeks to build general protocols and service request categories within the MDS environment that can be scaled to other mobility services and cities. This further integration will enable MyLA311 service requests to be delivered to operators via MDS API.

In addition, LADOT will establish a hierarchy for MyLA311 issues to guide providers in prioritizing the most urgent service requests. In addition, we will clearly define what is considered an adequate response to a service request and adjust response time requirements for operators based on violation type and volume of service requests.

Within MyLA311, we will adjust interface language to be more user friendly and pilot new violation categories such as Abandoned Vehicle and Unpermitted Company, reflecting inadequate service request categories.

An Outcome-Centered Fees, Incentives, and Deployment Marketplace.

05 | An Outcome-Centered Fees, Incentives, and Deployment Marketplace.

In Year 1, LADOT learned that providers largely do not serve equity zones, even when they are offered reduced per vehicle fee incentives. This passive approach does not result in more trips in equity zones. We need a better mix of incentives and nudges to achieve the wide range of public mobility and right-of-way management outcomes.

LADOT will create a new marketplace of fees, deployment incentives, and deployment requirements. The goal of this marketplace is to get better service in neighborhoods with the fewest choices. Within this marketplace, operators can choose their path to achieve their ideal fleet size, where vehicles can be placed, and the service and performance tradeoffs that can lead to fleet increases and other incentives.

A flexible marketplace approach can have the greatest impact on our ability to achieve better equity, deployment, and fleet size outcomes. LADOT will establish a fee structure that reflects the cost to administer, manage, and enforce the program, while balancing the need to support sustainable industry operations. Ultimately, this new incentive and deployment marketplace will better manage the public right-of-way and advance mobility equity.

Open Marketplace

Similar to Year 1, LADOT will not cap the number of companies that can enter the market, nor will it cap the types of on-demand micromobility modes that can apply for a permit. We will balance the need to increase mobility options for Angelenos with establishing clear expectations for performance and compliance thresholds. We expect operators to exhibit operational excellence or face penalties. Good performance will be critical for permit renewal in Year 2 and beyond.

Performance-Based Fleet Caps

LADOT will set a base fleet cap of 3,500 vehicles and award fleet increases based on good performance. Because dockless fleets concentrated in a limited number of neighborhoods during the pilot period, LADOT will require deployment and operations in Mobility Equity Zones.

LADOT did not establish a minimum fleet size in Year 1, resulting in several providers deploying fewer than 300 vehicles citywide. During the Year 2 permit program, LADOT will supplement the performance-based fleet capping system with a minimum fleet size. LADOT will establish a lower minimum fleet size for small and minority-owned businesses.

Fees

LADOT seeks to establish an On- Demand Mobility program fee structure that reflects the cost to administer, manage, enforce, and support sustainable vendor operations. For Year 2, LADOT will continue the one-time annual permit administration fee and replace the current $130 per vehicle fee with a variable per trip fee. High demand locations, such as Special Operations Zones (SOZs), have a greater management impact on LADOT and will command a higher per trip fee.

To ensure equitable access, Mobility Disadvantage Zones (MDZs) and Mobility Equity Zones (MEZs) will have a reduced and no per trip fee, respectively. This critical incentive complements MEZ deployment requirements. MDZ per trip fees will be lower than the base and SOZ fees.

Deployment Marketplace

LADOT must ensure deployment across the city is equitable and avoids both oversaturation in high demand locations and low availability in Mobility Equity Zones. We will limit the number of deployments in current and future SOZs, as is currently practiced in Venice. To gain access to high utilization areas such as Venice, Downtown Los Angeles, and Hollywood, providers must deploy a percentage of their total daily fleet in select equity zones. Our goal is to achieve at least 10% total fleet deployment in MEZs and MDZs for those providers that deploy in high utilization areas.

City Council can consider an innovative cap-and-trade subsidy model to shift the obligation of equity zone deployment to companies that want to operate in equity zones. Companies can offload their equity zone deployment requirements if they subsidize another provider to deploy in equity zones.

Incentive Marketplace

LADOT will establish the following incentives, among others:

- Eliminate per trip fees for trips to and/or from MEZs.

- Apply subsidies for MEZ trips (pending funding availability).

- Increase fleet size if operators surpass quarterly equity zone trip per vehicle per day (TVD) thresholds; achieve compliance targets; and demonstrate programmatic and technological innovation.

- Auction higher per trip fees to the highest bidder in exchange for greater supply in SOZs where deployment caps are not achieved.

Subsidizing On-Demand Mobility

On-demand, shared micromobility presents a clear public benefit and plays a key role in helping to advance LADOT's broader transportation goals. LADOT can consider identifying new funding sources to subsidize on-demand mobility service, particularly to ensure that serving equity zones is financially viable for operators. We can present revenue share mechanisms through some combination of on-vehicle and in-app advertisements and/or sponsored content for Council consideration. We will also pursue local, state, and federal grant funding to support equity zone subsidies, incentives, community-based organization partnerships, and community engagement.

New Direction 06

A rigorous compliance and enforcement framework.

06 | A rigorous compliance and enforcement framework.

LADOT will adopt a compliance program for the On-Demand Mobility Program that measures permitted provider and system performance in several key areas. The compliance framework could scale for for-hire vehicles and other future permitted mobility programs. The building blocks of LADOT's compliance evaluation and performance program include:

- **Technical compliance:** Ensure that policies implemented in the digital space are achieving their intended outcome in the real world.

- **Operational compliance and performance evaluation criteria:** Establish ongoing proactive operational compliance. Operational compliance measures operator performance across several categories, including vehicle availability; vehicle quality and safety; user and provider parking compliance; operator responsiveness to MyLA311 service requests; and adherence to application requirements.

- **Automated compliance validation that enable real-time warnings:** Build tools that track and automate compliance and enforcement activity for key compliance areas, such as fleet size thresholds; deployment thresholds in equity zones; deployment infractions in SOZs; and technical compliance thresholds. Automate compliance and enforcement activity to reduce impact on limited staff bandwidth to deliver the compliance program. These tools will enable compliance tracking and proactive notification to both City staff and operators.

- **Data collection and auditing methods, analysis, and reporting:** In-field verification will focus on variables associated with on-demand vehicle availability, vehicle quality, and vehicle parking compliance, all of which inform performance metrics that assess operator alignment to LADOT's overarching mobility, equity, and safety goals. The main reporting tools for the compliance program include a public dashboard and report card, an internal dashboard and report card, and internal and public monthly reports. The dashboard will incorporate real-time and monthly metrics, with the data varying on each depending on the frequency of data reporting.

Point-Based Fine, Penalty, and Enforcement Framework

By establishing clear performance standards and enforcement actions, we are signaling to operators and the general public our expectations for right-of-way stewardship. Enforcement should be proportional to the degree of severity and should balance specificity with enough flexibility to allow providers to act in accordance with a rule or regulation.

LADOT will establish fines, penalties, and thresholds that are outcome-oriented, fair, and definitive. LADOT will institute a points-based penalty structure where companies accrue points based on non-compliance and poor performance. Compliance will be weighted by violation type. For instance, a minor violation will accrue lower penalty points as opposed to a major violation or a violation that poses a serious safety hazard, which will command a much higher point value.

LADOT will establish a monthly fine structure based on accrued points that are determined by cumulative compliance performance. Under this fine structure, a provider's monthly points total will determine what amount they are fined on a monthly basis. A higher point total represents poor program performance and a larger fine.

New Direction 07

A culture of safety.

07 | A culture of safety.

As more on-demand mobility options become available, LADOT will establish safety requirements that guide user behavior or vehicles, vehicle design standards, and public infrastructure planning. LADOT will continue to conduct regular vehicle quality audits to ensure that vehicles are safe to operate and in good working order.

Guided by MDS trip data and performance evaluations, LADOT will use program fee revenues to fund safe street infrastructure and develop a citywide public education campaign on how to operate and park vehicles. Rider safety education will continue to be a shared responsibility between LADOT and the permitted operators, requiring ongoing accountability on both ends. However, LADOT will commit funding and resources to expand awareness far beyond the reach of the Year 1 Pilot Program.

LADOT has established new protocols that require operators to address safety and access concerns due to COVID-19. The global pandemic has heavily impacted how and where people travel. Ridership is at an all-time-low due to health concerns and safer at home orders. LADOT required operators to implement temporary sanitation protocols to address safety and access concerns. This may include developing sanitation guidelines and requiring providers to develop a sanitation plan. LADOT may also reduce per trip fees during ongoing outbreaks and require operators to provide a reduced monthly subscription rate for frontline workers as defined in Section 5.vii of the City's Safer at Home Order.

APPENDIX A
LADOT and Dockless Mobility Data Protections

LADOT and Dockless Mobility
Data Protections

With over 30,000 shared mobility devices (scooters and bicycles) registered with the City of Los Angeles, LADOT receives data notifications from dockless companies to confirm vehicle availability in disadvantaged communities, confirm company compliance with regulations that reduce sidewalk clutter and oversaturation, and prevent vehicles from operating in prohibited areas. The data also allows LADOT to audit the compliance of dockless companies with permit regulations, and confirm the accuracy and validity of the data they provide. From the onset of the program, protecting privacy has been a priority for the department and a design principle of the Mobility Data Specification the department uses to access data.

Roadmap

April 2019
Data Privacy Principles drafted for public comment

November 2019
Community Advisory Board for Dockless Evaluation Created

March 2019
Dockless Mobility Pilot Program Launches

November 2019
Data Privacy Principles endorsed by Council

Starting in Fall 2020
Aggregate data sets to the LA City Open Data Portal published

Ongoing
Update of Data Privacy Principles

June 2019
Data Privacy Report presented to City Council

September 2020
Revised data retention policies implemented

Privacy as Core Principle

LADOT maintains 52 different business lines -- from parking enforcement and traffic control to taxis and scooters -- and most require the use or receipt of data. For all of those business lines, LADOT is required to comply with all existing citywide data standards. Recognizing the unique nature of dockless mobility data received as part of its Dockless Shared Mobility Pilot, LADOT has gone beyond the City's standards, and developed program-specific approaches to protect and manage dockless mobility data.

As part of its Dockless Pilot, LADOT created Data Protection Principles to provide specificity to the classification, handling, and protection of the data received as part of this program. Key aspects of the Principles include classifying Pilot data as confidential

to protect it from public records requests, limiting access to the data within the department, and establishing a Master Data License and Protection contract to govern any City sharing with third parties. These principles explicitly prohibit monetization of the data, and also explicitly prohibit law enforcement from accessing MDS data without a warrant, subpoena or other court-ordered action.

In addition, the data providers send LADOT is encrypted in transit and LADOT encrypts all Pilot data notifications it receives using the AES-256 algorithm, an advanced encryption standard for electronic data based on specifications set by the U.S. National Institute of Standards and Technology.
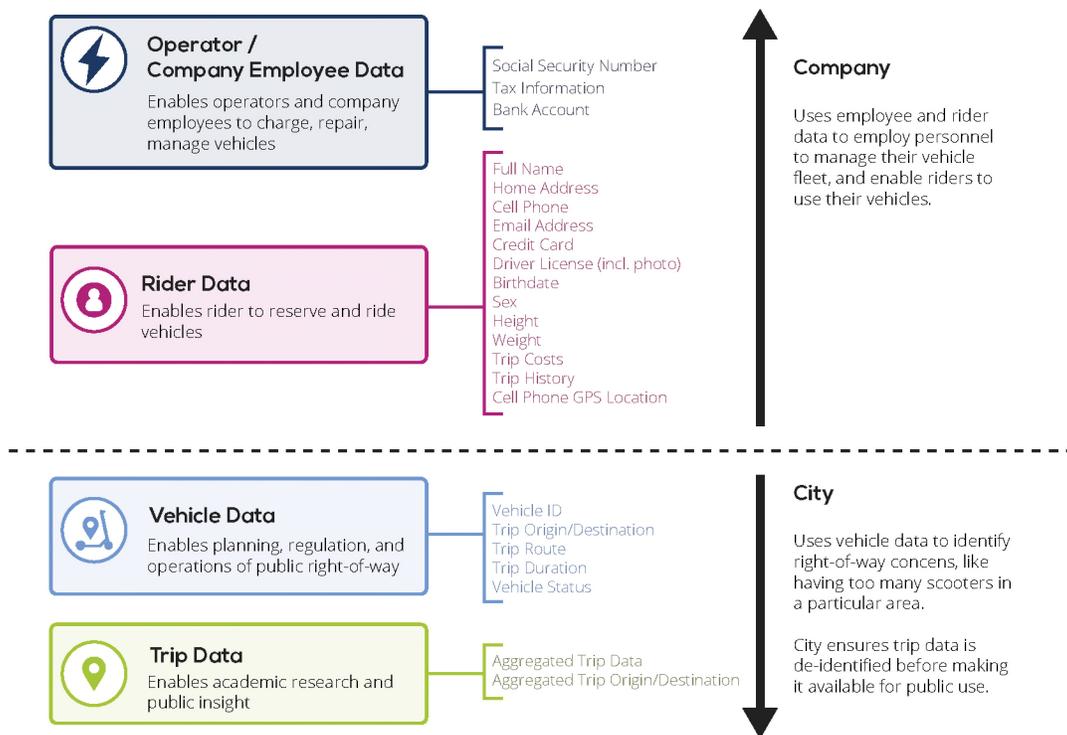
Ongoing Pilot Efforts

LADOT convened a Core Advisory Board (CAB) to engage with experts and community stakeholders and analyze equity considerations for the Pilot, including approaches to data. The board made a series of recommendations including,

developing additional communications on how LADOT is using dockless data to solve problems and address community impacts, and identifying data points that should be collected to inform equity metrics.

What Data Does LADOT Receive?

LADOT requires permitted operators operating in the public right-of-way to notify the City of movements of their GPS-enabled fleet. As the illustration below shows, LADOT collects vehicle and trip data. Vehicle data may help the city identify right-of-way concerns, such as an oversaturation of vehicles in an area. LADOT uses de-identified trips to understand ridership trends and utility of the services, to inform safety improvements and other planning efforts.

Operator / Company Employee Data
Enables operators and company employees to charge, repair, manage vehicles

- Social Security Number
- Tax Information
- Bank Account

Rider Data
Enables rider to reserve and ride vehicles

- Full Name
- Home Address
- Cell Phone
- Email Address
- Credit Card
- Driver License (incl. photo)
- Birthdate
- Sex
- Height
- Weight
- Trip Costs
- Trip History
- Cell Phone GPS Location

Company

Uses employee and rider data to employ personnel to manage their vehicle fleet, and enable riders to use their vehicles.

Vehicle Data
Enables planning, regulation, and operations of public right-of-way

- Vehicle ID
- Trip Origin/Destination
- Trip Route
- Trip Duration
- Vehicle Status

Trip Data
Enables academic research and public insight

- Aggregated Trip Data
- Aggregated Trip Origin/Destination

City

Uses vehicle data to identify right-of-way concens, like having too many scooters in a particular area.

City ensures trip data is de-identified before making it available for public use.

LADOT continues to refine the department's data practices. Key elements that LADOT will implement going forward include:

01 Publishing to the City Open Data Portal:

To share valuable insights with the public LADOT will publish de-identified Pilot data sets to the City's Open Data Portal, using proven and secure methods.

02 A Data Retention Policy Designed for Dockless Mobility Data:

Peer cities and experts agree that data should only be retained for as long as it is necessary for the data's intended purpose and use. In discussion with the City Attorney, data privacy experts, and peer cities, LADOT has developed retention policies for dockless mobility data that are in compliance with the City of Los Angeles Administrative Code Section 12.3(b):

- Depending on its purpose and role in future adjudication, any location data LADOT receives will be deleted or aggregated to minimize risk of re-identification, within 30-90 days from the time of receipt or collection.
- Location data will be deleted or de-identified within 30 days of receipt or collection for Safety and Planning/Capital Investment Use Case Types.
- Location data will be deleted or aggregated to minimize risk of re-identification within 90 days of receipt or collection for Compliance Use Case Types.

These draft policies noted above are being reviewed by ITA and the City Attorney and will be implemented Fall 2020.

03 Dockless Data Aggregation and Minimization:

To further improve data protections, LADOT will apply data treatments and strategies for each data use case. This will be a combination of data minimization and anonymization approaches, which will include aggregation, binning Trip Origin/Destination notifications, and K-anonymization as well as other future treatments as tools to protect data privacy evolve over time. LADOT is employing these approaches to improve data privacy and further reduce the risk that anonymised vehicle data can be used for re-identification.

04 LADOT Data Principles Update:

LADOT will continue to identify new protocols to update its data principles and define procedures for data minimization, anonymization, and retention, which will be revisited on an annual basis. New findings will be published in future Transparency Reports.

What is K-Anonymization?

K-anonymization is a data minimization approach that guarantees that no fewer than a specific number of scooter or bike trips can be uniquely grouped to a given time period and geographic area. For example, LADOT can set the variable of "k" to be a 10 minimum trips per zip code per week, so if fewer than 10 dockless trips occurred within a given zip code that week, the data set would not contain the location of any trips for that geographic area for that week and would instead be counted within a larger grouping for that week. This approach ensures that data remains useful while improving data protections by reducing the risk that anonymised data can be re-identified.
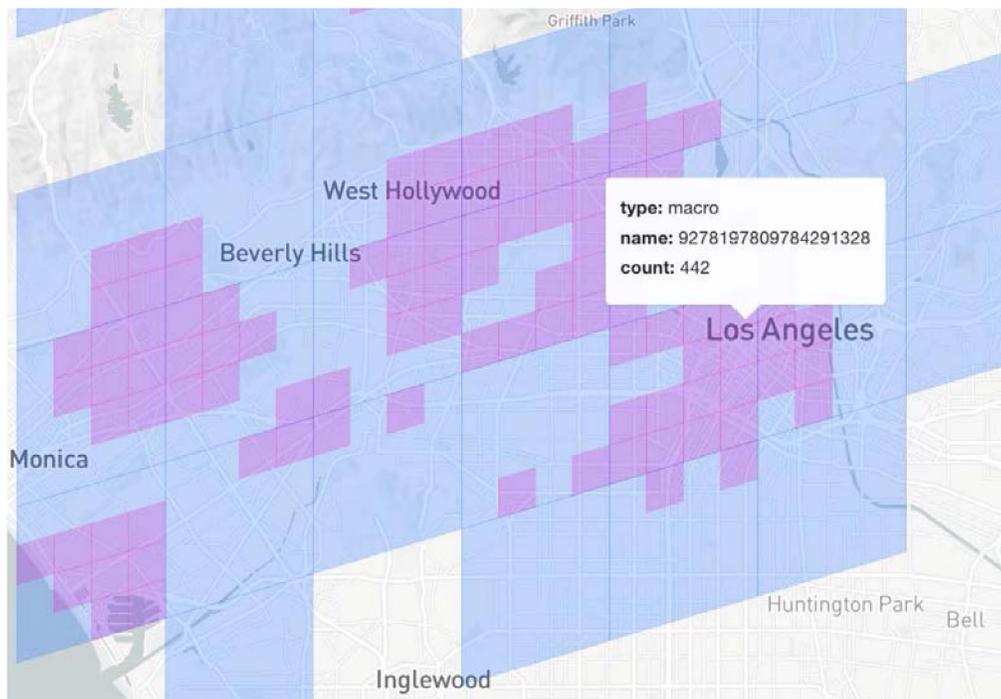
This image shows a set of dockless "trip start" notifications grouped or "binned" at two grid sizes to anonymize information.

CITY OF LOS ANGELES

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ERIC GARCETTI
MAYOR

~~DOCKLESS~~ ON-DEMAND ~~PERSONAL~~ MOBILITY RULES AND GUIDELINES
FY 2020-2021

Additions shall be *italicized and underlined*
Deletions will be evidenced by ~~Strikethrough~~

Goal

In the last decade, coinciding with the introduction of the smartphone, the City of Los Angeles ("City") has seen an explosion in new mobility products and services. Acceleration of shared mobility, artificial intelligence and machine learning, electrification and solar power, GPS and big data combined to change the mobility landscape more than in the previous 40 years. The City is taking a proactive approach to integrate these technologies into the fabric of its transportation system. This document, and the ~~beta~~ program described herein, is part of a broader effort to understand dockless, on-demand technology and the implications for the City and its citizens. This effort empowers the City with the tools to make informed, data-driven decisions to ensure transportation options are safe for City residents, and to deliver on the City's goals of socioeconomic and racial equity.

Purpose

The purpose of the ~~Dockless~~ On-Demand ~~Personal~~ Mobility Rules & Guidelines is to establish requirements to govern and permit the operation of a Program In the City.

Definitions

Adaptive or Accessible Bike *means a type of cycling device that allows people with varying levels of strength, different mobility constraints or conditions to use hands, feet, or a combination thereof to propel them and their device forward.*

City means the City of Los Angeles.

Customer means a person or organization that buys a mobility service from an Operator.

Mobility Disadvantaged Zone (MDZ) *means areas that are transportation disadvantaged but do not meet the Hardship Index developed by the Nelson A. Rockefeller Institute of Government[1] as a filter for*

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[1] https://rockinst.org/issue-area/hardship-americas-cities-suburbs/

socio-demographic vulnerability.

Mobility Equity Zone (MEZ) *are transportation disadvantaged areas and areas that meet the Hardship Index developed by the Nelson A. Rockefeller Institute of Government as a filter for socio-demographic vulnerability. "Transportation disadvantaged" refers to areas with transportation deficiencies including:*

- *Lack of access to modal options: areas that do not have access to transit, bike infrastructure, or shared mobility infrastructure. Access was defined as proximity to rail and bus transit stops, bikeways (separated, protected, or painted lanes), bikeshare stations, and BlueLA stations.*
- *Low travel quality: based on frequency of transit, level of traffic stress on major streets, and generalized travel cost based on travel time, and*
- *Crash safety risks: based on number of fatal and serious injury crashes*

Municipality means a city or a town that has corporate status and local government.

Program means the ~~Dockless~~ On-Demand ~~Personal~~ Mobility ~~Beta~~ Permit within the City.

Operator means a company that operates a Mobility-as-a-Service company within a Municipality.

Special Operation Zone (SOZ) *means a geographic zone that typically includes a geofence as well as other operational policy requirements to manage Operator or rider behavior in the area.*

Vehicle means an Operator device that is used or intended to be used by a person to move from one physical point to another.

Duration

A. ~~The Program is intended to last 1 calendar year from issuance of the first Program permit. The City reserves the right to modify the Program In duration or scope based on the information it collects from the Program.~~

B. ~~Notwithstanding the duration of the Program,~~ Operator Program permits must be renewed yearly. Permit requirements may be adjusted yearly to accommodate changing technology, needs, and priorities.

Modifications

At its discretion, the City reserves the right to amend, modify or change the terms and conditions within the Program.

Relationship to City

A. In rendering service hereunder, the Operator shall be and remain an Independent Contractor. It is expressly understood and acknowledged by the parties that any amounts payable hereunder shall be paid in gross amount, without reduction for penalties, taxes, or charges. Operators are responsible for assuming any applicable federal or state withholding taxes, estimated tax payments, or any other fees or expenses whatsoever.

B. Permits issued under this Program are not to be assigned or delegated to a substitute ~~provider~~

Operator, a successor in interest, or a purchaser of the permit without express written permission by the City.

C. The City reserves the right to terminate permits at any time and require the Operator to remove their entire fleet of Vehicles from City streets. An Operator will have 30 days to remove the entire fleet from City streets.

D. _Failure to comply with any of the rules and guidelines in this document may subject the Operator to suspension, revocation or non-renewal of its permit._

Non-transferability

A. This permit may not be transferred to another party or entity without the express written permission of the City of Los Angeles.

Indemnification

AGREEMENT TO INDEMNIFY, DEFEND AND HOLD HARMLESS ("Agreement")

By obtaining this permit, Operator agrees to defend, indemnify, and hold harmless the City, its officers, elected or appointed officials, employees, agents, and volunteers from and against any and all claims, damages, losses, expenses, fines, penalties, judgments, demands, and defense costs (including, without limitation, actual, direct, out-of-pocket costs and expenses, and amounts paid in compromise, settlement, or judgment, and reasonable legal fees arising from any claim or litigation of every kind or nature or liability of any kind or nature including civil, criminal, administrative or investigative) arising out of, in connection with, or which are in any way related to, the City's issuance of or decision to approve the Operator's Permit, the process used by the City in making decisions, Operator's participation in the Shared Mobility Device Pilot Program, the Operator's (including its officers, managers, employees, contractors, agents, and volunteers) business conduct and operations, any violation of any laws by the Operator (including its officers, managers, employees, contractors, agents, and volunteers) or its users, or any bodily injury including death or damage to property arising out of or in connection with any use, misuse, placement or misplacement, including but not limited to placement or misplacement resulting in alleged violations of the Americans with Disabilities Act (ADA), of Operator's device, property or equipment by any person, except such loss or damage which was caused by the sole willful misconduct of the City. Operator will conduct all defenses pursuant to this Agreement at Operator's sole cost and expense, and City shall reasonably approve selection of the counsel to represent City as proposed by Operator. This Agreement shall apply to all claims and liability regardless of whether any insurance of Operator, its affiliates or other parties are applicable thereto. The policy limits of any insurance of Operator, its affiliates or other parties are not a limitation upon the obligation of Operator, including without limitation, the amount of indemnification to be provided by Operator. The provisions of this section shall survive the termination of this Agreement.

SEVERABILITY AND GOVERNING LAW. If any provision or portion of this Permit shall be held by a court of competent jurisdiction to be invalid, void, or otherwise unenforceable, the remaining provisions shall remain enforceable to the fullest extent permitted by law. This Permit shall be governed by and

construed and enforced in accordance with the laws of the State of California applicable to contracts made and to be performed in California.

AMENDMENT/INTERPRETATION OF THIS PERMIT. This Permit represents the entire understanding of the parties as to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. The City, at its sole discretion pursuant to Los Angeles Municipal Code Section 71.29, may amend any term or condition of this Permit as necessary during the Pilot Program. This Permit shall not be interpreted for or against any party by reason of the fact that such party may have drafted this Permit or any of its provisions.

CPRA INDEMNITY LANGUAGE. ("Company") undertakes and agrees to defend, indemnify and hold harmless the City of Los Angeles and any of its boards, officers, agents, and employees (collectively, the "City") from and against all suits, claims, and causes of action brought against the City for the City's refusal to disclose Company's trade secrets or other technical or financial information, or Company's personally identifiable customer data, to any person making a request pursuant to the State of California Public Records Act (California Government Code Section 6250 et seq.). Company's obligations herein include, but are not limited to, all reasonable attorney's fees (both in house and outside counsel), reasonable costs of litigation incurred by the City or its attorneys (including all actual, costs incurred by the City, not merely those costs recoverable by a prevailing party, and specifically including costs of experts and consultants) as well as all damages or liability of any nature whatsoever arising out of any such suits, claims, and causes of action brought against the City, through and including any appellate proceedings. Company's obligations to the City under this indemnification provision shall be due and payable on a monthly, on-going basis within thirty (30) days after each submission to Company of the City's invoices for all fees and costs incurred by the City, as well as all damages or liability of any nature. Company shall receive prompt notice from the City of any (1) communication to the City challenging the City's refusal to disclose Company's information, and (2) any complaint or petition to the court challenging the City's refusal to disclose Company's information. Further should Company choose to intervene in any court action relating to the City's refusal to disclose Company's information, the City shall not oppose Company's motion to intervene. Company shall be discharged of its obligations to the City under this provision in any circumstance where Company provides written confirmation to the City that 1) all of the requested records at issue are not Company trade secrets, technical, financial or other similar information or personally identifiable customer data and 2) the City may release said records to the requester.

Insurance Requirements

A. All permitted Operators shall have commercial general liability insurance, including contractual liability, and property damage insurance written by an insurance company authorized to do business in the State of California, or approved by the California Department of Insurance as a surplus lines insurer eligible to do business in California, rated VII, A- or better in Best's Insurance Guide (or an alternate guide acceptable to City and Department if a Best's Rating is

not available) with Licensee's normal limits of liability, but not less than _Five Million Dollars_ ($5,000,000) for injury or death to one or more persons out of each accident or occurrence and Five Million Dollars ($5,000,000) for bodily injury and property damage for each occurrence. Each policy shall name the "City of Los Angeles, its officers, agents and employees" as Primary additional insureds.

B.   Workers' Compensation insurance as required by the State of California, with Statutory Limits and Employers' Liability Insurance with limits no less than $1,000,000 per accident for bodily injury or disease.

C.   Operators shall maintain an umbrella insurance policy providing coverage in excess of its primary general liability, employer's liability and automobile liability policies in an amount not less than $5,000,000 per occurrence. The city of Los Angeles must be named as additional insured.

D.   Automobile insurance with limits of liability not less than One Million Dollars ($1,000,000) covering injuries or death resulting from each accident or claim arising out of any one claim or accident. This insurance shall cover all owned, non-owned, and/or hired automobiles. Each policy shall name the "City of Los Angeles, its officers, agents and employees" as Primary additional insureds.

E.   All Operators shall have a performance bond of $80/Vehicle. The form of the bond shall be approved by the City. These funds shall be accessible to the City for costs that may be incurred for, including but limited to, removing and storing improperly parked Vehicles and if an Operator fails to remove the Vehicles when its permit is terminated. If an Operator increases the size of their fleet, the performance bond shall be adjusted appropriately before deploying additional Vehicles.

Operator Responsibilities

A.   Operators seeking to participate in the Program will register with the Office of Finance within the City for business tax compliance. Operators can either register on-line or in person at one of the public service centers.

B.   Operators must be in compliance and in good standing with tax payments or the permit may be revoked or not eligible for renewal the following year.

Universal Permit Requirements

A.   No vehicle shall be put in service until the appropriate Program permit is obtained from the City.

B.   Program permits shall be valid for a maximum of ~~six(6) months~~ _one year_ from the date of issue and all issued Program permits will expire on the same date.

C.   Operators are advised that application for a Program permit does not guarantee issuance of a Program permit.

Application Process and Permit Fees

Applicants for On-Demand Mobility vehicle permits shall file with the Department an application upon forms provided by the department, containing such information as is required by the rules and regulations of the LAMC, the Board, and the LADOT.

Each Operator who makes application for a permit shall submit with an application a nonrefundable administration fee, in the amount of ($20,000) as specified in LAMC Section ~~XX.XX~~ This fee is also to be paid upon renewal of the permit.

Permit applications must be succinct and all pages must be numbered. Boilerplate and glossy promotional materials are discouraged; any such materials deemed necessary should be included as a separate appendix and may or may not be considered as part of the evaluation. All components of the permit application shall be on 8.5" x 11" pages with the exception of two to three pages depicting imagery, mapping, etc. which may be on 11" x 17" pages. Font size shall be limited to 10-point font or larger with single line spacing.

Required Attachments including but not limited to:
- *Completed ON-DEMAND MOBILITY VERSION XX PERMIT APPLICATION with signatures.*
- *Application agreement*
- *Synopsis of operator service model and qualifications, including images of the vehicles and mobile application*
- *Schedule for implementation, including the size of fleet and service area at launch*
- *Size and service area of any planned fleet expansions (optional)*
- *Organizational structure of the operations team, including title, and their specific responsibilities on the project*
- *Screenshot illustrating how customers will be notified through a mobile and web application of the following:*
  - *Riders encouraged to wear helmets*
  - *Riders must obey all traffic laws*
  - *Proper parking procedures*
  - *Operating an electric scooter on the sidewalk is prohibited*
- *Proof of general commercial liability insurance with a minimum liability limit of $5,000,000 and that lists the "City of Los Angeles, its officers, agents and employees" as Primary additional insureds*
- *Proof of automobile insurance with limits of liability not less than One Million Dollars ($1,000,000) and that lists the "City of Los Angeles, its officers, agents and employees" as Primary additional insureds.*
- *Proof of Workers' Compensation insurance as required by the State of California, with Statutory Limits and Employers' Liability Insurance with limits of no less than $1,000,000 per accident for bodily injury or disease.*
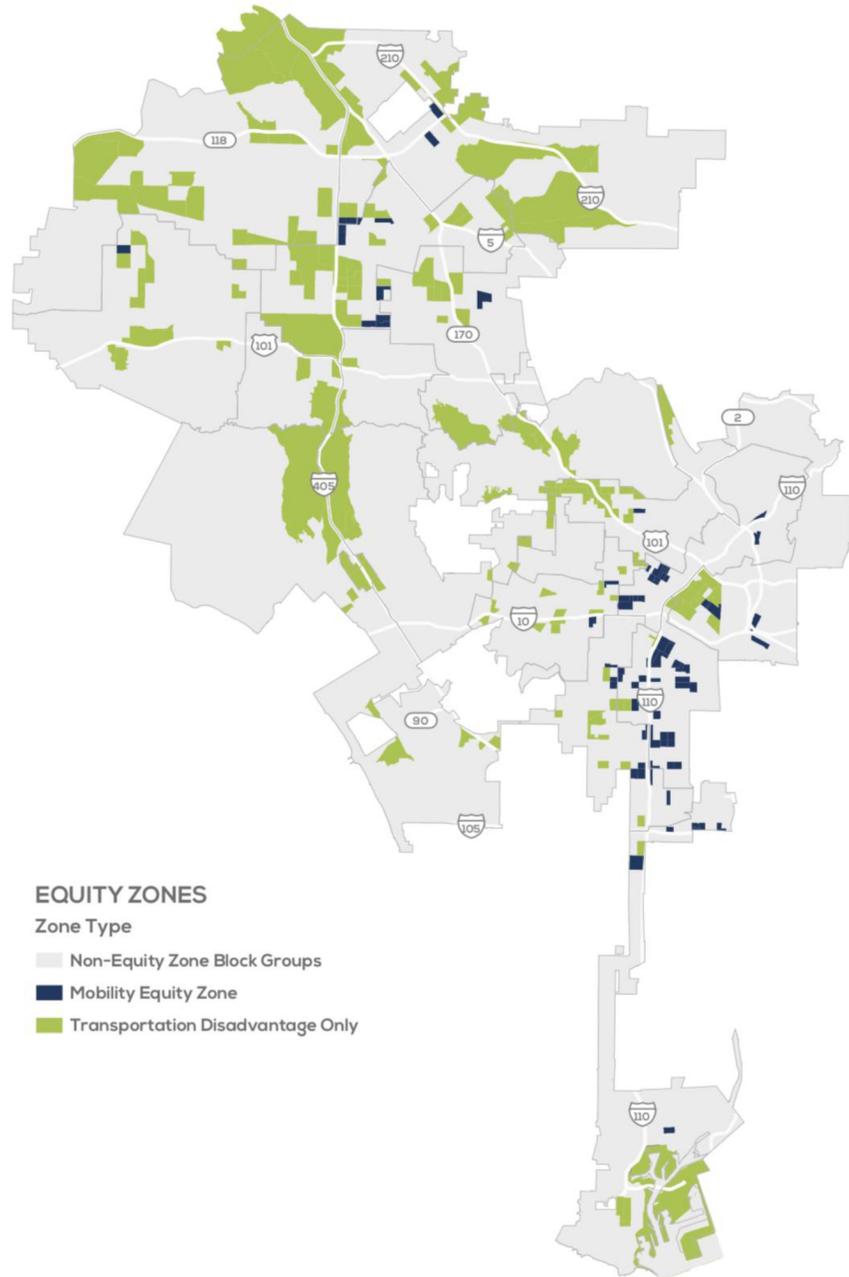- *Proof of umbrella insurance policy providing coverage in excess of its primary general liability,*

employer's liability and automobile liability policies in an amount not less than $5,000,000 per occurrence. The city of Los Angeles must be named as additional insured.

- *Proof of performance bond of $80/Vehicle.*
- *Indemnity Agreement (attachment provided by city).*
- *Non-Refundable Permit administration fee*
- *Organizational Chart & 24-Hour Contact Information*
- *Community Outreach plan that gives specific strategies for engaging with older adults and persons with disabilities.*

Upon Approval of the application and deployment of vehicles on the right of way, the permittee shall be subject to trip fees of $0.06 to $0.40 as follows:

Geography	*Applicability*	*Per Trip Fee**
Base	*Trips that begin and end outside of SOZ and MEZ*	*$0.20*
SOZ	*Trips that begin or end in SOZ*	*$0.40*
MEZ	*Trips that begin or end in MEZ*	*$0.00/ No Cost*
MDZ	*Trips that begin or end in MDZ*	*$0.06*

*The lower per trip fee will apply for trips that begin in one geography and end in another.

EQUITY ZONES

Zone Type

- Non-Equity Zone Block Groups
- Mobility Equity Zone
- Transportation Disadvantage Only

(Shapefiles will be made available to Operators)

The monthly trip fee payment is due on the last day of the following calendar month after which a trip has accrued. The payment is delinquent if not paid on or before the due date.

A penalty of ten percent of the amount of the payment and interest of 1.5% shall be assessed on any payment that has become delinquent. Failure to pay any delinquent payment within 30 days will result in

suspension of the Operator's permit.

Any fees arising from the need for City crews to relocate or remove vehicles from any location where a vehicle is prohibited under this permit shall equal the Bureau of Sanitation's Maintenance Laborer hourly rate plus any additional storage/impound fees.

Data Protection and Privacy

A. ~~As directed by the Los Angeles City Council (CF 19-1355)- the City will apply LADOT's data protection principles to all data obtained from Operators to carry out the City's and the Department's data protection responsibilities including, but not limited to, data categorization, data minimization, access limitation, security, and transparency to the public.~~

A. *The City of Los Angeles Department of Transportation (LADOT) works to deliver a safe, livable, and well-run transportation system throughout the region. Our vision is for all people in Los Angeles to have access to safe and affordable transportation choices that treat everyone with dignity and support vibrant, inclusive communities. As we work to achieve our responsibilities of safety, congestion relief, equity, and sustainability, we also have a responsibility to protect individual privacy and promote a transportation system free from discrimination and the exploitation of personal mobility data.*

B. *The Mobility Data Specification (MDS) is designed to process vehicle data minimally necessary for our stated goals and to apply strong privacy protections and security protocols.*

C. *As part of its Dockless Mobility permitting process, the City of Los Angeles requires Mobility Service Providers (Operators) operating on the streets of Los Angeles to comply with the MDS. Such permitting rules set a consistent standard for the transfer, use, and protection of vehicle data from Operators to LADOT.*

D. As directed by the Los Angeles City Council (CF 19-1355)- the City will apply LADOT's data protection principles to all data obtained from Operators to carry out the City's and the Department's data protection responsibilities including, but not limited to, data categorization, data minimization, access limitation, security, and transparency to the public.

1) Data categorization: LADOT designates raw trip data as Confidential Information under the City of Los Angeles Information Technology Policy Committee (ITPC) Information Handling Guidelines. This long-standing policy for the City of Los Angeles governs the obligations of the City to protect all manners of data under its control. LADOT will withhold this Confidential Information as exempt from release under the California Public Records Act.

2) Data minimization: LADOT will mandate data sets solely to meet the specific operational and safety needs of LADOT objectives in furtherance of its responsibilities and protection of the public right of way.

a. Aggregation, obfuscation, de-identification, and destruction: Where possible, LADOT will aggregate, de-identify, obfuscate, or destroy raw data where we do not need

single vehicle data or where we no longer need it for the management of the public right-of-way.

b. Methodologies for aggregation, de-identification, and obfuscation of trip data will rely on industry best practices and will evolve over time as new methodologies emerge.

3) Access limitation: LADOT will limit access to raw trip data related to vehicles and vehicle trips to what is required for our operational and regulatory needs as established by the City Council.

a. Law enforcement and other government agencies, whether local, state, or federal will not have access to raw trip data other than as required by law, such as a court order, subpoena, or other legal process.

b. Similarly, the City will only allow access to raw trip data by contractors under the LADOT Third Party Master Data License Agreement which explicitly limits the use of raw trip data to purposes directed by LADOT and as needed for LADOT's operational and regulatory needs. LADOT will prohibit use of raw trip data for any non-LADOT purposes, including for data monetization or any third party purpose.

c. After completion of the Dockless Mobility Pilot, LADOT will create a publicly accessible transparency report discussing the types of third party requests for Dockless Mobility data that LADOT has received and how we have responded to those requests.

4) Security: The City will enact appropriate administrative, physical, and technical safeguards to properly secure and assure the integrity of data.

a. Los Angeles' formal information security program and the comprehensive set of security protections and standards established by the City will govern this data as it does all other city data, including but not limited to security incident and emergency response reporting.

b. The City will conduct ongoing security testing to audit and improve security protections, consistent with the City of Los Angeles' information technology policies and practices.

5) Transparency for the public: The public deserve a clear description of the data used by LADOT and the ways such data is pertinent to the responsibility of protecting the public right-of-way. To that end, LADOT will publish a list of the data types collected via the MDS and the length of time that data is retained.

a. The City of Los Angeles shares certain information with the public to increase transparency, accountability, and customer service and to empower companies,

individuals, and non-profit organizations with the ability to harness a vast array of useful information to improve life in our city. We share data via the City of Los Angeles Open Data Portal. Before we publish any Dockless. Mobility data to the Open Data Portal, LADOT will ensure the data is de-identified in accordance with established data protection methodologies. LADOT will not release any Dockless Mobility data on the Open Data Portal until data de-identification and destruction treatments are implemented.

Vehicle Identification

A. Every Vehicle shall have a unique identifier that is readily visible to the Customer or any member of the public. Operators shall provide easily visible contact information, including toll-free phone number and email address, on each Vehicle for the Customers or members of the public to make relocation requests or to report other issues with the vehicles.

Health and Safety

A. All bicycles shall meet the safety standards outlined in ISO 43.150 – Cycles, as well as the standards outlined in Code of Federal Regulations Title 16, Chapter II, Subchapter C, Part 1512 – Requirements for Bicycles. In addition, all bicycles shall meet the standards established in CVC section 21201, including for lighting during operation in darkness.

B. Electric-assist bicycles shall be "Class 1" or "Class 2" electric bicycles only, as defined in California Vehicle Code (CVC) Section 312.5 Additionally, the City reserves the right to terminate any permit issued under this Program if the battery or motor on an electric-assist bicycle is determined by the City to be unsafe for public use.

C. An electric scooter shall be any two-wheeled device that has handlebars, has a floorboard that is designed to be stood upon when riding, and is powered by an electric motor or other power source. This device may also have a driver seat that does not interfere with the ability of the rider to stand and ride and may also be designed to be powered by human propulsion. A motorcycle, as defined in Section 400 of the California Vehicle Code, a motor-driven cycle, as defined in Section 405 of the California Vehicle Code, or a motorized bicycle or moped, as defined in Section 406 of the California Vehicle Code, is not an electric scooter.

D. Electric scooters shall be incapable of reaching a top speed of greater than 15 mph. LADOT reserves the right to revise the speed limit based on collision and injury data.

E. Electric-assist bicycle systems shall have visible language that notifies the user that:
    -   Helmet use is encouraged while riding a bicycle;
    -   Riders shall yield to pedestrians; and
    -   When riding on-street, follow the rules of the road, following all motor-vehicle laws and ordinances in the City of Los Angeles.

F.   Electric scooter systems shall have visible language that notifies the user that:
    -    Helmets use is encouraged when operating an electric scooter;
    -   Riders shall yield to pedestrians;
    -   When riding on-street, follow the rules of the road, following all motor-vehicle laws

and ordinances in the City of Los Angeles;

- "No Riding On Sidewalks" (minimum 48-point font) located on the platform of every scooter; and
- Customers must be a minimum of 18 years old with Driver's License to operate a Vehicle.

G. Electric scooter systems shall have always-on front and back lights that are visible from a distance of at least 300 feet under normal atmospheric conditions at night. Front and rear lights must stay illuminated for at least 90 seconds after the vehicle has stopped during a trip.

H. *Cleanliness and Sanitary Guidelines*
Operators have an obligation to protect the health and welfare of riders and the surrounding community.
The LADOT requires that certain methods must be done to ensure the safety of the public. These measures include the following:
● All Providers must ensure that sanitary gloves are worn by all individuals, whether employee or independent contractor, who perform any type of maintenance on the vehicles. This includes individuals who charge and/or deploy and rebalance vehicles.
● All Providers must ensure that its vehicles are sanitized and disinfected prior to each deployment or upon return to the warehouse.
● All Providers must ensure that any vehicle brought to its warehouse is sanitized and disinfected regardless of whether the vehicle was sanitized previously that day.
● All Providers must provide in-house staff with appropriate disinfectants for cleaning frequently touched surfaces and ensure that external stuff also uses appropriate disinfectants for cleaning frequently touched vehicle surfaces.
      ○ Refer to the Environmental Protection Agency's list of recommended disinfectants
● All Providers must educate staff, whether employee or independent contractor, on how to protect themselves from infection.
● All Providers must educate dockless mobility customers through digital media about vehicle sanitation practices.
● Dockless Providers may also temporarily remove a portion or all of its dockless fleet from circulation during an emergency if it deems such action as necessary. This will not affect the Providers permit as long as all requirements are met when the devices are re-deployed

● All Providers must submit updated sanitation protocols to the LADOT, particularly as it relates to protocols enacted to help prevent the spread of COVID-19.
● Any later updates to a provider's sanitation protocols must be submitted to the LADOT.

Fleet Size

A. All Operator applicants to the Program shall include the total fleet size in their application.
B. All Operators shall have a ~~minimum~~ *maximum* fleet of ~~500~~ *3,500* Vehicles; ~~Operators shall meet~~

~~this fleet size within four weeks of the date of issuance of their Program permit.~~

C. ~~All Operators using only adaptive bicycles for persons with disabilities (non-electric) shall have no minimum fleet size. If using any combination of dockless bicycles (non-electric), electric-assist bicycles, or electric scooters with adaptive bicycles, Operator will be required to meet the 500-vehicle minimum.~~

D. ~~Operators must reserve a minimum of 50 percent of their fleet size for electric vehicles unless providing adaptive bicycles (non-electric) and/or scooters for persons with disabilities. Operators that do not provide 50 percent of their fleet size for electric vehicles must reserve a minimum of 1 percent of their fleet size for adaptive bicycles.~~ *All vehicles must be zero emission.*

E. Operators shall notify the City and submit a revised Permit Application To request an increase in total permitted fleet size prior to deploying new Vehicles into service.

F. ~~The overall fleet size per Operator may not exceed 3,000 Vehicles, with the exception if the Operator is adding vehicles within disadvantaged communities as defined by the CalEnviroScreen 3.0~~

G. ~~Operators may add up to 2,500 vehicles in communities that scored at or above the 75th percentile as defined by the CalEnviroScreen 3.0, Operators may be allowed up to 5,000 additional vehicles in disadvantaged communities in the San Fernando Valley.~~

H. Additional vehicles after the total ~~10,500~~ *3,500* fleet maximum may be permitted at the discretion of the General Manager and may depend on factors related to performance and Program compliance. ~~General Manager to publish the criteria used to evaluate expansion permits.~~

I. *At the end of each quarter, a requested fleet increase beyond 3,500 vehicles may be authorized if the following Equity Zone trip thresholds are achieved based on a tiered trips per vehicle per day (TVD) metric.*

- *If an operator can demonstrate an average of 1.0 Trip per Vehicle per Day for vehicles deployed in MEZs (lowest demand, highest need) equity zones, an additional 2,000 vehicles may be authorized by the LADOT.*

- *If an Operator can demonstrate an average of 1.5 TVD in MDZs, an additional 1,500 vehicles may be authorized by the LADOT.*

J. If an Operator's Compliance score is less than 50 points at the end of each quarter an additional 500 vehicles may be authorized by the LADOT.

K. If an Operator demonstrates programmatic and technological innovation (e.g. sidewalk riding technology, helmet provision for all trips, etc.), an additional 500 additional vehicles may be authorized by the LADOT per area of excellence

L. The General Manager may reduce the permitted number of vehicles in the case of demonstrated

Program noncompliance and/or nonperformance by permittee.

DEPLOYMENT

The base number of vehicles an operator may deploy on the right-of-way will be limited to 3,500. LADOT will allow for access to high utilization areas such as Venice, Downtown Los Angeles, and Hollywood, by requiring operators to also deploy a percentage of their total fleet in the defined Equity Zones.

- *Operators that deploy any vehicles in the Venice area, shall have at least five percent (5%) of the Operator's total fleet also deployed in MEZs.*

- *Operators that deploy any vehicles in Downtown Los Angeles and/or Hollywood (but not Venice), shall have at least five percent (5%) of its total fleet deployed in MDZs or MEZs.*

- *Failure to adhere to these requirements may result in a reduction of the Operator's fleet, or a suspension or revocation of the permit.*

MEZ and MDZ Price Capping (Effective Spring 2021)

To ensure that equity zone trips are available and affordable for those in the area, the LADOT requires the following maximum charges for trips in these areas:

- *Trips that begin or end in MEZs shall not exceed $1.25 per trip per customer.*

- *Trips that begin or end in MDZs will not exceed $1.75 per trip per customer.*

- *Trips that use adaptive vehicles shall not exceed $1.25 per trip, per customer in any zone.*

Compliance with Mobility Data Specification
A. All Operators shall abide by the Mobility Data Specification("Specification") as published online at https://github.com/openmobilityfoundation/mobility-data-specification and updated from time to time.
B. As part of the Program permit application process (initial or renewal), all Operators shall demonstrate support for v1.1 or any subsequent version of the LADOT MDS API Technical Compliance Overview.
C. The City may conduct maintenance on, stop providing, and/or change the method of access to the Services, Software, and/or Content outlined in the LADOT MDS Compliance Guidelines at any time, with or without notice to the Operator. For avoidance of doubt, the City, in its sole discretion, may temporarily or permanently suspend Operator's access to the Services, Software, and/or Content under this Agreement.

Service Area and Geo-Fencing

A. The Program is valid only for operations within the City's rights-of-way.
B. At the City's discretion, additional operating zones may be established including locations within parks, publicly-accessible plazas, on-street parking spaces, off-street parking lots/garages, or campuses. However, permission to do so shall require coordination with the appropriate department, agency, or property owner; and shall be communicated to the Customer through signage approved by the respective entity and/or through the Operator's mobile and web application.
C. The City reserves the right to determine where Vehicle parking is prohibited or to create geo-fenced stations within certain areas where Vehicles shall be parked. The City will make this information available via MDS policy end-point or alternative method.
D. The City shall maintain geographic parking boundaries for Operators and make these available via the MDS policy end-point or alternative method.

Special Operations Zones (SOZ)

A. At the City's discretion, Special Operations Zones may be established to address neighborhood-specific concerns including, but not limited to, oversaturation, operating regulations, equity, fleet caps, and parking behavior. These Special Operations Zones will be published via the MDS policy end-point.

~~Marketing / Advertising~~

~~A.   Operators shall not display third party advertising on their Vehicles.~~

Operator Customer Service

A. All Operators shall provide a mechanism for Customers to notify the Operator that there is a safety or maintenance issue with the Vehicle.
B. Operator shall maintain an updated organizational chart with contact information of their operations team and advise the LADOT Program Manager of any changes within 48 hours.

Reporting / Data Sharing

A. Raw data supplied by an Operator shall be held confidentially between the City and the Operator to the extent that is permitted by law. However, summaries, program utilization data, and trend data may be made public.
B. Personally Identifiable Information on Customers collected by Operators may not be transmitted to, processed or stored at a destination outside of the United States.
C. The City is permitted to use all data the Operator provides in accordance with the Program including, but not limited to, displaying real-time data and real-time Vehicle availability data to the public. Third parties are permitted to republish any data the City publishes.
D. During the Program, Operators shall distribute to their Customers a City-provided customer survey at a maximum frequency of quarterly.

Operations & Maintenance

A. All Operators shall have a staffed operations center in the City and a 24-hour contact person available for emergency removals.

B. Operator shall remedy devices parked incorrectly or are inoperable within two hours of being notified by the City from 7am to 10pm daily.

~~C. Operator shall remedy devices parked incorrectly or are inoperable within two hours of being notified by the general public from 7am to 10pm daily.~~

C. *In emergency situations where the public's safety may be involved, Operators, when notified by the Department, shall deactivate and remove all vehicles within a given area and not re-deploy them until advised to do so by the City.*

D. An Operator shall repair any inoperable Vehicle or any Vehicle that is not safe to operate before returning the Vehicle into revenue service.

E. If LADOT or any other City department or office incurs any costs addressing or abating any violations of this agreement, or incurs any costs of repair or maintenance of public property, and potentially upon receiving written notice of City costs, the Operator shall reimburse the City for such costs within thirty days of receipt of an invoice detailing such costs.

F. Operators will attend an on-site meeting with City staff to discuss the program and show a demonstration Vehicle that will be deployed prior to permit approval.

G. Operators shall submit maintenance schedule and maintenance logs to the City via the report-maintenance API or MDS v0.1 endpoint.

311 Integration and Response

Operator agrees to be responsible for integrating with and closing out MyLA311 Service Request tickets within the 311 System. Failure to respond to open Service Requests in 311 will be grounds for discipline including but not limited to denying increased fleet sizes, reducing existing fleet size, and/or revoking permit.


Parking

A. For any permitted location response obtained from the MDS policy end-point, an Operator shall ensure their Vehicles are parked in the landscape/furniture zone of the sidewalk, preferably to a bicycle rack or in another area specifically designated for bicycle parking. Operators shall inform Customers on how to properly park a Vehicle.

B. *Throughout the course of Permit year 2020-2021, but no later than March 1, 2021,* every Vehicle ~~may~~ *shall* be equipped with a locking mechanism to lock to a fixed object preferably a bicycle rack.

C. Every Vehicle may have smart technology equipment to prevent theft, technology identifying if a vehicle is upright and properly parked, and GPS tracking. ~~However, LADOT shall reserve the right to require operators to include a locking mechanism to lock to a fixed object at any time.~~ Operators shall remove electric scooters from the public right-of-way on a daily basis.

D.   All ~~dockless~~ vehicles within a reasonable timeframe but no longer than 3 months after issuance of the latest Program permit shall come equipped with technology that would prevent operators from ending a ride if the vehicle is not standing upright.

E.   Operators shall ensure their Vehicles are not parked in a way that impedes the regular flow of travel in the public way, or in a way that impedes the clearance on sidewalks needed for ADA compliance. Legal parking includes the landscape/furniture zone and any bicycle rack in the public right of way.

F.   Operators are responsible for informing Customers how to park the Vehicle correctly. Operators will provide a "Parking Plan" on how they will incentivize Customers to park safely and correctly and will be responsible for passing on fees and disincentives for Vehicles parked illegally outside of the "furniture zone" and outside of "geo-fenced areas".

G.   Restrictions to eligible parking zones on sidewalks shall be as follows:
- Vehicles shall not be parked at the corners of sidewalks nor at any crosswalk, curb ramp, or within any feature that serves as an accessible element such as landings, areas of refuge, detectable warning surfaces, or any other physical feature that may be required for mobility.
- Vehicles shall not be parked on blocks where the landscape/furniture zone is less than 3 feet wide, or where there is no landscape/furniture zone.
- On blocks without sidewalks, Vehicles may be parked if the travel lane(s) and 6-foot pedestrian clear zone are not impeded.
- The City reserves the right to determine certain block faces where dockless parking is prohibited.
- Vehicles can only be parked on hard surfaces within the landscape/furniture zone (e.g. concrete, asphalt).
- Any Vehicle that is parked in one location for more than 5 consecutive days without moving may be removed by the City's Bureau of Sanitation and taken to a City facility for storage at the expense of the Operator. Bureau of Sanitation shall invoice the violating Operator for fees incurred.
- Vehicles shall not be parked in the landscape/furniture zone adjacent to or within:
    - Parklets;
    - Transit zones, including bus stops, shelters, passenger waiting areas and bus layover and staging zones, except at existing bicycle racks;
    - Loading zones;
    - Disabled parking zone, or any other accessible route that would otherwise create a barrier to accessibility;
    - Locked to street furniture that requires pedestrian access (for example - benches, parking pay stations, bus shelters, transit information signs, etc.);
    - Curb ramps;
    - Red curb zones;
    - Entryways; and

- Driveways.

H. Vehicles shall be upright when parked.

I. Operators shall work with each individual Council District if additional parking is required, which includes bicycle racks and/or bicycle corrals.

J. Vehicles shall not be parked within 15' of street corner pedestrian ramps (25' if there is only a single pedestrian ramp). Refer to graphic below:
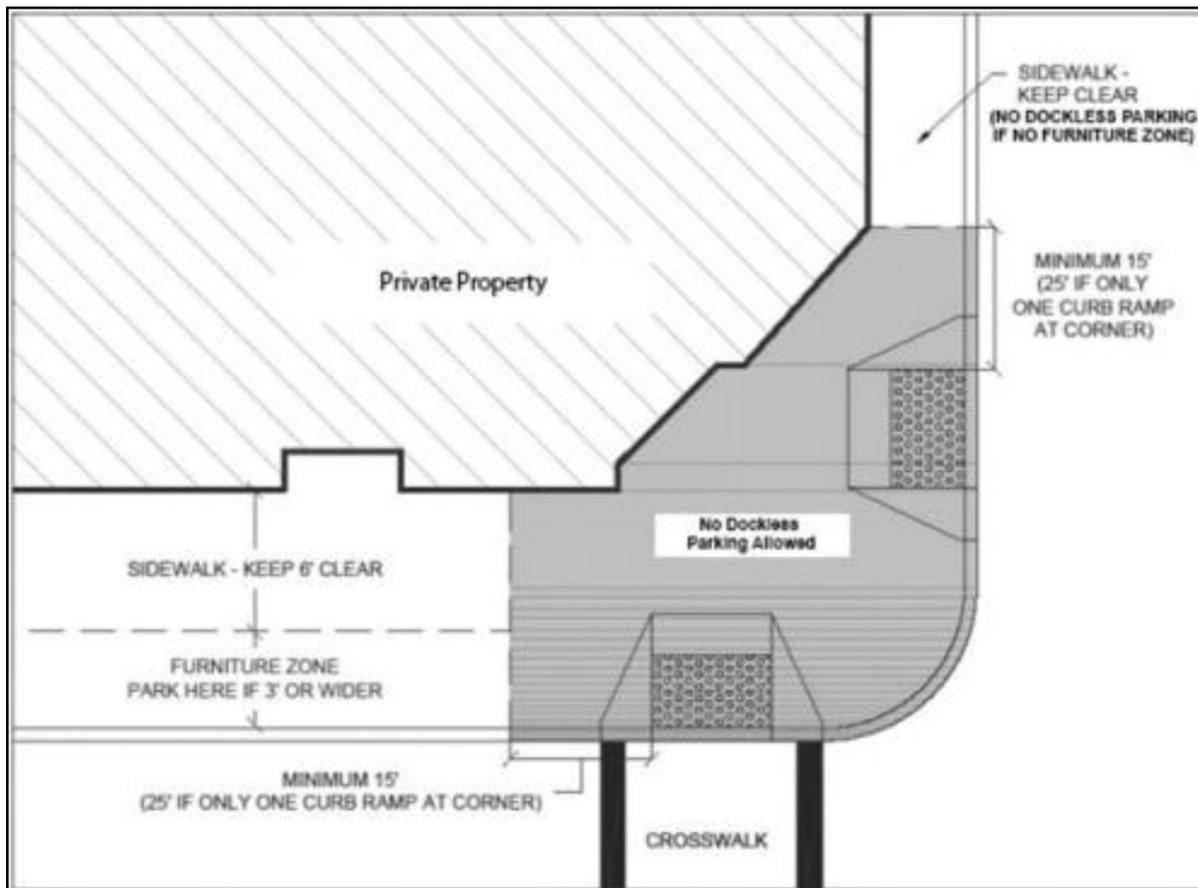
Enforcement & Termination Grounds

A. If data is falsified or the City suspects dishonest reporting, the City reserves the right to revoke the Program permit. In the case of a Program permit being so revoked, the Operator will not have an opportunity to reapply for a permit for at least one year.

B. If Vehicle parking standards are not met on a monthly basis, the City reserves the right to revoke the Program permit.

C. Grounds for terminating Program permits include, but are not necessarily limited to:

- Failure to meet the terms and conditions set forth in the Program permit and/or the Rules and Guidelines;
- Failure to put vehicles into service within 30 days;
- Failure to share data;

- Failure to abide by the MDS Specification;
- Failure to abide by the LADOT MDS API Technical Compliance Overview v1.1 or any subsequent version
- Failure to move vehicles located outside of the defined geo-fenced area.
- *Falsification or information submitted by the Operator of any portion of the application that has been determined to be intentionally misleading.*

Fine and Penalty Schedule
The purpose of the fines and penalty schedule is to encourage Operators to maintain their fleet and self-regulate. The following is a set of violations and their classifications which will be measured against the Operators:
Operational Requirements are below:

Minor (1 point)	_Moderate (10 points)_	_Severe (25 points)_
Dirty vehicles	_Non-functioning headlights_	_Failure to submit or maintain insurance as required (Immediate Suspension of Permit until issue rectified)_
Flat tire	_Low brake power(minimal)_	
Broken lenses	_Bent or loose stems_	_Non-Indemnity_
Missing slip pad or loose pieces	_Bent handlebars (minor)_	_Major brake failure_
Excessive dents and scratches	_Unauthorized or "Ghost" vehicles deployed_	_Bald Tires_
Loose kickstands	_Vehicles blocking pedestrian walkways_	_Cracked frames_
Tipped or downed vehicles		_Locking brakes_
Vehicles blocking traffic right-of-way	_Blocking wheelchair ramps, access zones or crosswalks_	_Loose wheels_
Vehicles with dead batteries in the right-of-way	_Missing or illegible QR Square or identification number_	_Bent wheels_
Use of vehicle which has been removed from the registry	_Abandonment of vehicle_	_Non-Functioning accelerator_
Failure to respond to customer or Department request for action or information	_Missing battery_	_Loose brake handles_
Failure to de-register vehicles that are lost or unrecoverable and advise the Department		_Loose, broken handlebars_
Failure to respond to customer complaints or notify the Department of the resolution		_Exposed wires or circuitry_
Missing safety and contact information		_Failure to respond to a safety complaint_
		Failure to respond to a safety violation

Technical compliance:

Upon submission of any application for authorization to operate within the City, every company will be subject to LADOT verification and confirmation that the company fully complies with the Mobility Data Specification (MDS) requirements. Once confirmed, all such requirements shall be kept current at all times during the duration of any permits issued. Willful non-compliance or inability to comply shall be due cause for immediate suspension and/or revocation of the operator's permit.

All vehicles shall be registered through MDS prior to deployment on City streets and highways.

Required information shall be available to the Department on a 24 hour/ 7 days a week basis.

All company's vehicles shall conform to the MDS current requirements for all Service Level Agreements (SLAs) as defined by the LADOT

Technical Compliance Chart

Issue	*Impact to downstream compliance needs*	*Unit measure of non-compliance*	*Points per infraction*
All dockless vehicles present in the LA public right-of-way (defined by /policy/geographies) must be registered with MDS registry endpoint (/vehicles) prior to deployment.	*1*	*For each vehicle found to be unregistered*	*1*
All events must have a valid timestamp as defined in the OMF MDS Agency specification. Timestamps cannot be in the future (i.e. greater than at the time of the event).	*1*	*For every 1,000 event points that are non-compliant*	*1*
All telemetry must have a valid timestamp as defined in the OMF MDS Agency specification. Timestamps cannot be in the future (i.e. greater than at the time of the event).	*1*	*For every 10,000 telemetry points that are non-compliant*	*1*
All events must follow valid state transitions as defined in the OMF MDS Agency state diagram.	*1*	*For every 10,000 state transitions that are non-compliant*	*1*

All telemetry must be valid (ex. cannot be [lat: 0, lng: 0])	*1*	*For every 10,000 telemetry points that are non-compliant*	*1*

Each trip needs to be well-formed:
 	
    ○ *Each trip_id must have at least one associated trip_start or trip_end event*
 	
    ○ *Each trip_id can have multiple associated trip_enter or trip_leave events*
	1	*For every 10,000 trip_id's that are non-compliant*	*1*

*The following vehicle events need to be posted (/vehicles/{device_id}/event) within **5 seconds** of the company-triggered action occurring. These events are those that occur in the public right of way.*
 	
    ○ *Trip_start*
 	
    ○ *Trip_end*
	1	*For every 10,000 events posted that are non-compliant*	*1*

*The following vehicle events need to be posted (/vehicles/{device_id}/event) within **30 seconds** of the company-triggered action occurring. These events are those that occur in the public right of way.*
 	
    ○ *Provider_drop_off*
 	
    ○ *Provider_pick_up*
 	
    ○ *Service_start*
 	
    ○ *Service_end*
 	
    ○ *Trip_enter*
 	
    ○ *Trip_leave*
	2	*For every 10,000 events posted that are non-compliant*	*1*

○ *Reserve* ○ *Cancel reservation*				

For all posted vehicles telemetry that is associated with a trip must have an associated trip_id. These include:
 	
    ○   *Trip_start*
 	
    ○   *Trip_end*
 	
    ○   *Trip_enter*
 	
    ○   *Trip_leave*
	1		*For every 10,000 telemetry points that are non-compliant*	*1*

*All telemetry data must be provided via the telemetry endpoint (/vehicles/telemetry) during the trip or **within 24 hours of trip completion**.*	*1*		*For every 10,000 telemetry points that are non-compliant*	*1*
*Telemetry data must include a telemetry measure point **at least every 5 seconds** along the path traveled within the city's boundary (/geography/geographies).*	*2*		*For every 10,000 events posted that are non-compliant*	*1*
*Vehicles last reported in the public right of way **shall not go more than 48 hours without sending an update** to the LADOT MDS System. For vehicles that have lost connectivity, the operator is required to send a valid event transition. Vehicles last reported in the public right of way that do not send a signal after 48 hours will still be considered in the public right of way.*	*2*		*For every 10,000 telemetry points that are non-compliant*	*1*

Policy compliance*: an important component of operational compliance is adherence to digital policies created by LADOT and communicated to Operators using MDS.*

Policy compliance violations will be measured by the number of distinct days on which an Operator violated each policy (per-policy-per-day), irrespective of how many vehicles were adjudged to have violated the policy. All policy compliance violations are correctable.

Operators failing to provide MDS required data, after agreement to do so in their application shall have 10 days to come into compliance. Failure to do so by the 10th day may result in revocation of their authorization to operate within the City

All On-Demand Mobility Operators are responsible for the following violations:

Major (10 points)	_Safety (25 points)_
Vehicles not obeying the speed limit during a trip in geofenced zones with a speed limit of >0mph *A number of vehicles deployed in a geography defined by a policy that exceeds the number of vehicles allowed to be deployed there (e.g. a parking zone in the Venice Special Operations Zone)* *Vehicles deployed in a geography defined by a policy where deployment is prohibited (e.g. areas of Venice Beach outside parking zones)* *A number of vehicles deployed in the public right-of-way by Operators within the city boundary that exceeds the overall cap(s) on the number of vehicles allowed to be deployed there*	*Vehicles not obeying the speed limit during a trip in geofenced zones with a speed limit of 0mph* *Vehicles locked by riders in geofenced zones where locking vehicles is prohibited*

For every violation that accumulates points, there will be a monthly assessment with the attendant penalty being issued to the company each month. The points shall be cumulative. The fines shall be issued based upon where the company is in its points schedule. Below is the penalty assessment schedule:

Penalty Fees	
1-9 points: *Written warning*	*110-119 points:* *$55,000*
10-19 points: *$5,000*	*120-129 points:* *$60,000*
20-29 points: *$10,000*	*130-139 points:* *$65,000*
30-39 points: *$15,000*	*140-149 points:* *$70,000*
40-49 points: *$20,000*	***150-159 points:*** ***$75,000****
50 + points: ***$25,000****	*160-169 points:* *$80,000*
60-69 points: *$30,000*	*170-179 points:* *$85,000*
70-79 points: *$35,000*	*180-189 points:* *$90,000*
80-89 points: *$40,000*	*190-199 points:* *$95,000*
90-99 points: *$45,000*	***200+ points:*** ***$100,000*******
100+ points: ***$50,000*****	

Program Point Thresholds

Points Accumulated During Permit Year	*Fine/Penalty*	*Percent of Fleet Suspended and Suspension Time*
50	*$25,000*	**10% of Fleet for Seven Days*

_100_	_$50,000_	_**50% of Fleet for Ten Days_
_150_	_$75,000_	_***100% of Fleet for 30 Days_
_200_	_$100,000_	_****Potential Permit Revocation_

Correctable Safety Violations: Vehicle Removal

Once an operator has been notified that a vehicle has been deemed **unsafe** or in such a condition that removal must be immediate, the operator shall have One hour to remove the vehicle from the public right of way.

Correctable Minor/Major Violations: Vehicle Removal

Once an operator has been notified that a vehicle is in violation (minor or major), Vehicle removal must occur within two hours of notification.

Performance Scoring:

For violations that are correctable, no points will be issued if the vehicle is removed in the appropriate time frame or repaired within the appropriate time frame. Although LADOT will not issue a point a record of the violation will be maintained.

> _For violations that have not been corrected within the appropriate time frame, or that are uncorrectable_
> _based upon the chart, points will issue and will accumulate throughout the permit year. Each company will be informed monthly of its point totals and any fines that will be issued based on_
> _point accumulation._

All violations (with the exception of Insurance and non-indemnity violations) are appealable.
All fines, including those for insurance and non-indemnity violations are appealable.

Lack of Insurance and continued non-compliance with MDS are causes for suspension and/or
Revocation.

For every violation, alleged violation or series of violations cited the operator shall be issued a notice of violation. The notice shall list a brief description of the violation(s), point totals alleged and commensurate fine amount.

Los Angeles Municipal Code Sections 71.07-71.10 governs appeals processes, suspensions, revocations and monetary penalties.

Appeal- Administrative Hearing

An operator has 10 days to appeal notice of violation and fine as described above. Failure of the operator to appeal within 10 days subjects the operator to the full fine amount and point totals.

The Hearing will be scheduled with an independent Administrative Hearing Officer.

During the appeal, the fine amount does not have to be paid at that time and the operator may continue to operate.

Exceptions to operation: Lack of Insurance, or inability of LADOT to digitally identify vehicle on Right of Way within the Service Level Agreement timeframes.

Appeal Process to Transportation Commission:

If the operator is assessed a penalty after the administrative hearing, it shall have a second right to appeal the Department's assessment at the Transportation Commission. The Operator would have 10 days to appeal the matter to the Commission.

The operator shall list the reason(s) why the suspension or monetary penalty should not be upheld.

Based on the evidence presented, the Board may uphold all or part of the Department's action. Unless the operator can provide proof of new, unheard evidence, the decision of the Board is final.

Judicial Review

If the Transportation Commission upholds the Department's action the Operator has the right of judicial

review.

Judicial review of an action by the Board levying such monetary penalty or of an action of the City Council in denying an appeal, as provided for herein, shall be available only if a petition for a writ of mandate is filed in the Superior Court not later than the 90th day following the date upon which the decision of the Board becomes final, which shall be the expiration of the period during which reconsideration can be sought, provided that if reconsideration is sought the decision is final for the purposes of this section on the date that reconsideration is rejected.

Termination Payment

The City may terminate a Program permit issued without cause, in whole or in part, at any time by written notice to the Operators. Operators shall remit any final payment to the City no later than 60 days from the written notice of termination.

Waiver

The City's decision not to insist upon strict performance by the Operators of any provision of the permit in every one or more instances shall not constitute a waiver of such provision by the City, nor shall, as a result, the City relinquish any rights that it may have under the terms of the pilot program.

Liquidated Damages - Forfeiture

A. As actual damages would be difficult, if not impossible to determine, the City and any Operator accepting permits under the Program agree that penalty for noncompliance with any provision of the Rules and Guidelines and other permit issuance requirements may result in termination of all or one Program permits, at the election of the City, without refund, reimbursement or adjustment or any and all fees paid to the City as of the date forfeiture for breach is determined. Determination shall be written notice from the City to the Operator.

Outreach & Equity

A. Operators must attend meetings with City's Business Improvement Districts, Neighborhood Councils, Council Districts, surrounding municipalities, Transportation Management Organizations/Associations, Disability Rights Organizations/Centers for Independent Living, and any other community-based organization as stipulated by the City to introduce the Operators to them and make these communities aware of the Program and how it may affect the communities.

B. *Operators must partner with a Community Based Organization (CBO) approved by the LADOT for the duration of its permit. The Operator may change CBOs during the permit year, but each organization must be approved by the LADOT. Failure to partner with a CBO will result in suspension or revocation of the permit.*

C. Vehicles will be available at rates that are clearly and understandably communicated to the

Customer prior to Vehicle use.

D. Operators are responsible for educating the public on the Program, and on how to use the Vehicle safely.

E. Operators are required to have a non-smart phone option for Customers to use the ~~dockless On-Demand Mobility~~ Vehicle system.

F. Operators are required to have a non-credit card option for Customers to use the ~~dockless~~ On-Demand Mobility vehicle system.

G. Operators will offer a one-year low-income Customer plan that waives any applicable bicycle/e-scooter deposit and offers an affordable cash payment option and unlimited trips under 30 minutes to any customer with an income level at or below 200% of the federal poverty guidelines, subject to annual renewal.

H. *Operators must provide customer service, outreach, and advertising materials in multiple languages including but not limited to Spanish.*

I. *Operators must conduct, submit, or respond to surveys as requested by the LADOT including but not limited to surveys related to job creation and community outreach.*

~~**Fees**~~

~~**Annual Permit Application Fees**~~	~~$20,000/year~~	~~Administration of the Permit. Fees shall be due upon application submittal(Non-Refundable)~~
~~**Annual Vehicle Fee**~~	~~$130/vehicle per year~~	~~An increase in fleet size shall incur additional charges and must be paid prior to deployment.~~
~~**Discounted Vehicle Fee**~~	~~$39/vehicle per year~~	~~Discounts extend to vehicles deployed and maintained in CalEnviroscreen 3.0 Disadvantaged Communities. The discount represents a 70% reduction.~~

A. ~~Applicants shall pay $20,000 for an Annual Permit for the Program. Note if any stations or other structures are proposed, each site shall require additional review deposits and permitting.~~

B. ~~Applicants shall pay a program administrative fee of $130/vehicle the City.~~

Application Requirements

Permit applications must be succinct and all pages must be numbered. Boilerplate and glossy promotional materials are discouraged; any such materials deemed necessary should be included as a separate appendix and may or may not be considered as part of the evaluation. All components of the permit application shall be on 8.5" x 11" pages with the exception of two to three pages depicting imagery, mapping, etc. which may be on 11" x 17" pages. Font size shall be limited to 10-point font or larger with single line spacing.

Required Attachments including but not limited to:
- Completed DOCKLESS ON-DEMAND PERSONAL MOBILITY VERSION 0.2 PERMIT APPLICATION with signatures.
- Application agreement
- Synopsis of operator service model and qualifications, including images of the vehicles and mobile application
- Schedule for implementation, including the size of fleet and service area at launch
- Size and service area of any planned fleet expansions (optional)
- Organizational structure of the operations team, including title, and their specific responsibilities on the project. There is a strong preference to hire locally.
- Screenshot illustrating how customers will be notified through a mobile and web application of the following:
    - Riders encouraged to wear helmets
    - Riders must obey all traffic laws
    - Proper parking procedures
    - Operating an electric scooter on the sidewalk is prohibited
- Proof of general commercial liability insurance with a minimum liability limit of $5,000,000 and that lists the "City of Los Angeles, its officers, agents and employees" as Primary additional insureds
- Proof of automobile insurance with limits of liability not less than One Million Dollars ($1,000,000) and that lists the "City of Los Angeles, its officers, agents and employees" as Primary additional insureds.
- Proof of Workers' Compensation insurance as required by the State of California, with StatutoryLimitsandEmployers' Liability Insurance with limits of no less than $1,000,000 per accident for bodily injury or disease.
- Proof of umbrella insurance policy providing coverage in excess of its primary general liability, employer's liability and automobile liability policies in an amount not less than $5,000,000 per occurrence. The city of Los Angeles must be named as additional insured.
- Proof of performance bond of $80/Vehicle.
- Indemnity Agreement (attachment provided by city).
- Permit application fee of $10,000.
- Organizational Chart & 24-Hour Contact Information

- ~~Discounted Vehicle fee of $20/vehicle for vehicles deployed and maintained in CalEnviroscreen 3.0 Disadvantaged Communities.~~

Modification of the Agreement

A. The City may modify any of the terms and conditions contained in this Agreement at any time and in the City's sole discretion.

B. If any modification is unacceptable to you, your sole recourse is to terminate this agreement. Your continued usage of the services, software, and/or content following the city's modification constitutes your irrevocable and binding acceptance of the change.