

## Communication from Public

**Name:** Colin Hughes, Lyft Senior Policy Manager - Transit, Bikes, & Scooter  
**Date Submitted:** 03/15/2021 10:38 AM  
**Council File No:** 17-1125  
**Comments for Public Posting:** Please see attached for Lyft's comments in response to the forthcoming dockless mobility permit.



PDF VIA EMAIL

3-11-2021

Jarvis Murray  
For-Hire Transportation Administrator  
City of Los Angeles  
Department of Transportation  
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Los Angeles, CA 90012  
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Mr. Murray,

We are contacting you jointly to discuss several matters related to the forthcoming dockless mobility permit. We have appreciated your outreach to the operators over recent months to develop new regulations around equitable service provision and feel that aspect of the regulations has improved significantly. As you know, we currently have less than 3 weeks before we expect a new dockless mobility permit to be issued in Los Angeles and the final language of the permit has not yet been released. We have several questions and concerns we would appreciate you addressing at your earliest convenience:

**Special Operating Zones:** LA's Special Operating Zones are areas that took a huge amount of investment in community outreach, product development, and operational refinement on the part of current operators to serve sustainably. Furthermore, fleet sizes are already highly limited in these areas. We ask that you not allow new operators to serve SOZ's for their first year of operation as a means to ensure that current operators can recoup their investment in serving these areas sustainably, and new operators do not arrive and upset the harmony with these communities that we have all worked so hard to establish.

**Double-charging fees on trips that cross municipal boundaries:** We all know that seamless transportation networks are crucial to improving people's access and mobility, especially when it comes to sustainable modes like micromobility and transit. We also know that the fractured governance structures in the LA area is a challenge for many governments. Currently LADOT would charge us a full fee for any trip that starts or ends in another municipality, the result being that operators will be double-charged for providing this seamless, sustainable public mobility service across municipal lines. We do not think that providing intra-municipal trips should be met with the punishment of a double fee charge, we believe it should be encouraged. We ask that you charge us half price, for trips that start or end outside of Los Angeles city limits.

**Insurance Requirements:** Los Angeles has one of the country's highest insurance requirements for any dockless mobility program. In Los Angeles, a dockless scooter requires General Liability of \$5M per occurrence, \$5M in the aggregate, and \$5M in excess insurance. However, a shared car in Los Angeles only requires \$1M per occurrence, \$2M in the aggregate, and zero excess insurance. Even rental aircraft in Los Angeles require only \$5M per occurrence in general liability and zero excess insurance. Other leading cities in shared mobility, like Washington DC and Denver, also only require \$1 million per occurrence and \$2 million in aggregate. While safety is always a top concern for us, after two years of operating scooters in LA, it seems clear that these small, slow vehicles are not substantially more dangerous to the public than cars and aircraft and do not require 5 times the insurance. Requiring more insurance than necessary for micromobility, compared with car rentals, hurts micromobility's ability to compete with cars and weakens operators' ability to invest in meeting other goals of the city -- like providing equitable service. We ask you to please amend the insurance requirements to be in line with California's recently adopted micro mobility insurance requirement of \$1 million per occurrence and \$5 million in aggregate.

**New permit application process:** Given the very limited amount of time left to operators to develop and submit applications for LADOT's review, can you please detail a timeline and requirements for the permit application process? We ask that, as in most cities, we are given at least a month to assess and complete a permit application.

We look forward to working closely on these regulations going forward.

Sincerely,

Colin Hughes  
Senior Policy Manager - Transit, Bikes, & Scooter

CC:  
Seleta Reynolds, General Manager  
Jose Elias, Transportation Planning Associate  
Councilmember Bob Blumenfield, District 3  
Councilmember Paul Koretz, District 5  
Councilmember Mike Bonin, District 11  
Councilmember John Lee, District 12  
Councilmember Mitch O'Farrell, District 13  
Councilmember Kevin de León, District 14  
Councilmember Joe Buscaino, District 15