

CF# 17-1125

COMMENTS FROM LIME

Date: 6-27-18
Submitted in T Committee
Council File No: 17-1125
Item No.: 24
Deputy: public

After reviewing the latest staff report on Los Angeles' Dockless Mobility Permit Program, Lime is supportive of revisions made following Committee Member comments last month. We appreciate the City's efforts to provide additional scale and flexibility to operators. We have a few remaining suggestions regarding the current version which we believe would improve our ability to be responsive to the mobility needs of LA's diverse neighborhoods:

- Fleet size
 - Lime supports a minimum fleet size of 500 vehicles to ensure that operators are capable of providing a service to a minimum standard.
 - As an alternative to the tiered cap structure recommended in the report, we recommend the City institute a truly dynamic cap that would allow companies to adjust fleet size on a real-time basis without the burden and delays of administrative approval for each incremental change in fleet size. The minimum threshold for fleet expansion should be 3 trips per vehicle per day (TVD) in non-disadvantaged communities. This TVD requirement would be waived for deployments in disadvantaged communities, to ensure operators continue to allocate vehicles to these areas even if ridership is lower than in other areas.
 - Because operators will be implementing the Mobility Data Specification in keeping with the City's proposed requirements, the City will have full visibility to monitor operator compliance with TVD thresholds and other performance-based metrics, and can communicate with operators if issues arise, making additional administrative approval or verification unnecessary.
 - Operators will still be incentivized to deploy vehicles in disadvantaged communities under the dynamic cap approach, since the TVD threshold requirement will be waived for those areas, and City fees for those vehicles may be lower, depending on which fee structure the City chooses.
- Marketing/Advertising
 - Lime opposes the restriction placed on operators from displaying third party ads on their vehicles. City buses and taxi vehicles display advertisements. Equal treatment should be provided to pilot program operators as well to ensure operators have the opportunity to generate additional sources of revenue that will help reduce prices for customers.

- Parking

- Lime recognizes the City has a legitimate objective in ensuring that these vehicles are parked in a compliant way. However, we do not view requiring operators to have a lock-to mechanism as a viable solution. The detailed parking guidelines and operational standards laid out in the regulations provide a sufficient incentive to operators to develop appropriate technologies and operational procedures to ensure vehicle parking compliance. A lock-to requirement would also be detrimental to the City's goal of having operators provide vehicles in disadvantaged communities, as availability of infrastructure in those communities may not be adequate to support this function.
- We are constantly pursuing technology improvements to increase user parking compliance without compromising mobility access, and are also excited to work with the City on creating better infrastructure solutions for parking, starting with prototyping street or sidewalk parking corrals in high-traffic areas to better accommodate Angelenos benefitting from this new mode of travel.
- If the City feels it is imperative to reserve the lock-to requirement as an option at a later point, we believe this decision should at a minimum go through a full City Council approval process due to the impact it would have on all communities in Los Angeles.

Our suggested language changes are in the attached document, with edits in red.

We are excited about and supportive of this program and look forward to serving the City of LA.

Fleet Size

e) Initially, all Operators are limited to a fleet-size of 500 Vehicles. Operators may exceed the minimum 500 vehicle fleet size provided that the Operator maintains a fleet average of 3 rides per day per vehicle, subject to City verification via the Operator's implementation of the Mobility Data Specification. All vehicles deployed in disadvantaged communities as defined by the CalEnviroScreen 3.0, or communities scored at or above the 75 percentile as defined by CalEnviroScreen 3.0, will be excluded from the calculation of the operator's daily average of rides per vehicle.

~~f) Operators shall notify the City two weeks prior to deploying new Vehicles to the fleet and shall submit a revised Notice to Proceed and Permit Application.~~

~~g) The overall fleet size per Operator may not exceed 2,500 Vehicles, with the exception of if they are adding vehicles within disadvantaged communities as defined by the CalEnviro Screen 3.0~~

~~h) Operators may add up to 2,500 vehicles in communities that scored at or above the 75 percentile as defined by the CalEnviroScreen 3.0.~~

~~i) Additional vehicles may be permitted at the discretion of the General Manager and may depend on factors related to performance and compliance.~~

Marketing/Advertising

~~a) Operator shall not display third party advertising on its Vehicles.~~

Parking

b) During the period of the pilot, LADOT shall work with all Operators to identify areas of high program utilization where the City shall allocate sidewalk or curbside street space for bike and scooter parking corrals to improve the availability of appropriate vehicle parking locations. Use of these spaces shall be voluntary for users and shall not infringe on the right of users to park vehicles in legal sidewalk locations in the same vicinity. ~~Every Vehicle shall may be equipped with a locking mechanism to lock to a fixed object preferably a bicycle rack, or shall have smart technology equipment to prevent theft, technology identifying 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.~~

Outreach & Equity

f) Operators will offer **discounted pricing to low-income customers** ~~a one-year low income Customer plan~~ that waives any applicable bicycle/e-scooter deposit and offers an affordable cash payment option and **a discounted rate aligned with the current percentage savings offered by the Los Angeles Metropolitan Transportation Authority's LIFE (Low-Income Fare is Easy) program** ~~unlimited trips under 30 minutes~~ to any customer with an income level at or below 200% of the federal poverty guidelines, subject to **Operator verification** ~~annual renewal~~.