

Communication from Public

Name: Tim Alborg
Date Submitted: 10/23/2019 11:35 AM
Council File No: 17-1125-S3
Comments for Public Posting: Comments regarding Dockless Scooter Pilot Program are attached.

October 23, 2019

To: Seleta J. Reynolds, General Manager
Los Angeles Department of Transportation

Re: Dockless Scooter Pilot Program Recommendations

Thank you for your recent quarterly update on the One-Year Dockless On-Demand Personal Mobility Pilot Program. We look forward to the future of shared dockless mobility in Los Angeles and the possibility of LADOT ushering the pilot towards a permanent program.

At Spin, we're committed to working with your team to ensure that all Angelinos benefit from micromobility options such as Spin scooters in their neighborhoods. That's why we suggest the following items for consideration in LADOT's permanent dockless mobility regulations:

Limit Vendors and Vehicles

Consider a limit on the number of vendors (either through a limited vendor RFP or permit application process) and a limit on the number of vehicles (per company + overall) that can participate in the permanent program. Companies that are selected to participate in LA's permanent program should be awarded additional vehicles *per review period* based on achieving certain metrics. Cities like Washington, DC, San Antonio, Nashville, and others are creating new regulations that seek to limit the number of operators in order to create a more sustainable business for operators (better user experience, less apps for users to download, etc.) and a better city management experience (easier communication with operators, higher standards, and better enforcement).

Incentives for Good Partners

Incentivize companies that follow the rules and prove themselves to be good partners. The City of Portland provides a good example through an incentive program they've created. Their incentive language reads:

"A permittee who demonstrates a commitment to collaboration with the City and recognizes the importance of local control of regulation and management of the Public Right-of-Way may be eligible for a 15% allotment increase."

We propose that LADOT consider a 25% increase per review period for good partners. Here are some of the "good partnership" metrics that Portland tracks:

- Permittee is compliant with communication
- Permittee is proactively communicating and responding swiftly to the appropriate party to thoroughly resolve all questions or requests
- Participation in innovative projects or programs that support city goals and are outside of daily pilot program requirements
- Required data reports are on-time, complete, and appropriately formatted
- Permittee organizes free safety workshops

Penalize Bad Actors

Penalize companies who score negatively on partnership metrics. These companies should not be considered good actors and therefore subject to a fleet decrease (amount to be determined by LADOT, but we'd suggest 25% fewer vehicles per review period).

Promote W-2 Hiring Practices

Incentivize companies that hire W-2 employees (rather than 1099 independent contractors) in the City of Los Angeles. For example, companies that hire W-2 employees that provide living wages should receive additional fleet increases each review period.

Per-ride Fee

Consider a per-ride fee of \$0.10, rather than a per-vehicle fee, for enforcement and administration of the permanent program.

Expansion of Special Operations Zones

In the near term, before permanent regulations are finalized, expand the Special Operations Zone to the neighborhoods of Downtown LA, Hollywood, and Koreatown to mitigate the oversaturation of vehicles and bad behavior exhibited by some dockless mobility companies.

Spin believes that SOZ rules have been helpful in mitigating some of the bad behavior that we've seen from these companies in places like Venice.

Thank you for your consideration as we move forwards together towards a permanent program early next year!

If you have any questions or concerns, please don't hesitate to reach out.

Thank you,

A handwritten signature in black ink, appearing to read 'T. Alborg', with a large, stylized flourish at the end.

Tim Alborg
Director of Government Partnerships
Spin, Inc.
(770) 595-0190
tim.alborg@spin.pm