

## **Sample 2019 Point-to-Point Carsharing Permit Terms and Conditions August 21<sup>st</sup> – September 5<sup>th</sup> Comment Period Full Comments and Answers**

QUESTION 1: What is the fee to operate in Residential Permit Parking zones?

ANSWER 1: In the 2019 permit year, the cost is \$280 per car per year. This cost tracks the price of a standard RPP permit (\$35 currently) though, so it is subject to change when the price of the standard RPP permit changes.

QUESTION 2: Where can we access the parking spots and meter rates API? Are these in one API or are they separate?

ANSWER 2: Separate, please see the below APIs.

- Parking meter locations: <https://opendata.dc.gov/datasets/parking-meters>
- Parking meter policy (meter rates): <https://opendata.dc.gov/datasets/parking-meter-policy>
- Parking pay by space (Chinatown): <https://opendata.dc.gov/datasets/parking-meter-spaces>
- Our open data is hosted on Open Data DC (<https://opendata.dc.gov/>).

QUESTION 3: Are there APIs or files that contain the most up to date representation of Wards?

ANSWER 3: Here is the District's Open Data dataset on Ward information.

- <https://opendata.dc.gov/datasets/ward-from-2012>

QUESTION 4: Regarding the Live Map that is required, will the map actually need to list out a count of vehicles per ward? Or will dots on a map suffice? Additionally, in the Live Map section, it outlines that we should show vehicles in "surrounding jurisdictions". Is there a certain radius around the District that would suffice?

ANSWER 4: The overlay should display a count of Carsharing Vehicles available in each Ward, total Carsharing Vehicles available in the District, and total Carsharing Vehicles located in surrounding jurisdictions. This map should capture the activity of any vehicles operating under this permit.

QUESTION 5: With the membership by Ward data, would the ask here be to group users by their mailing address entered within the app or is there another method that is needed?

ANSWER 5: Using the member's mailing address to produce this deliverable is an acceptable way to meet this requirement.

QUESTION 6: Who are residents supposed to contact when they see vehicles overstaying the 24-hour residential zone limit?

ANSWER 6: To report carsharing vehicles overstaying the 24-hour limit in a residential zone, please contact the company first. The contact information for each company permitted to operate in public space is available at the below link.

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<https://ddot.dc.gov/page/street-carsharing-program>

If the company is unresponsive via these methods, the resident is encouraged to contact DDOT at [ddot.parking@dc.gov](mailto:ddot.parking@dc.gov) or (202) 673-6813. Please make sure to communicate the license plate number of the vehicle which has stayed over 24 hours.

QUESTION 7: Why are Point-to-Point Carsharing Companies allowed to park in residential areas?

ANSWER 7: Carsharing in residential areas offers an alternative to private car ownership. The availability of carsharing in reduces parking congestion by allowing residents that would otherwise own a private vehicle to share a vehicle with their neighbors.

QUESTION 8: Why is DDOT putting out a permit process for Point-to-Point Carsharing?

ANSWER 8: DDOT actively manages the On-Street Carsharing Program with a public space permit. Carsharing is a valuable service that allows for car usage without the high cost of private car ownership. The public space permit ensures that the District recovers the cost of the usage of public space, that participating Carsharing Companies provide the District with information on how they are using the public right of way, and that the Carsharing Companies operate in an equitable manner.

QUESTION 9: How long are carsharing vehicles allowed to spend in RPP zones at one time?

ANSWER 9: Point-to-Point Carsharing Vehicles operating under this permit are allowed to stay on any block in the public right-of-way (including RPP blocks) for up to 24 hours at a time.

QUESTION 10: What is the process for reporting illegally parked carsharing vehicles?

ANSWER 10: Any illegally parked vehicles, including carsharing vehicles, should be reported to DPW Parking Enforcement via the 311 phone number or 311 online portal (<https://311.dc.gov/citizen/home>).

QUESTION 11: Do the permitted carsharing companies have the resources and facilities to maintain these vehicles?

ANSWER 11: This permit requires that the Carsharing Companies report their fleet's maintenance activity to the District, so that DDOT can monitor major maintenance issues.

QUESTION 12: How much is DDOT proposing carsharing vehicles pay for these "extended parking permits"?

ANSWER 12: The two basic fees of this permit are a Residential Parking Fee and Meter Recovery Fee. The Residential Parking Fee is eight (8) times the value of a standard Residential Permit Parking (RPP) permit, per year, per Carsharing Vehicle, and the Meter Recovery Fee charges the Permit Holder for any time its vehicles spend in meter spaces.

QUESTION 13: Will we be using <https://opendata.dc.gov> parking meter APIs, or will DDOT be providing another source of data? If providing from another source, how/when will that be provided?

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ANSWER 13:

Please see the below APIs.

- Parking meter locations: <https://opendata.dc.gov/datasets/parking-meters>
- Parking meter policy (meter rates): <https://opendata.dc.gov/datasets/parking-meter-policy>
- Parking pay by space (Chinatown): <https://opendata.dc.gov/datasets/parking-meter-spaces>

Our open data is hosted on Open Data DC (<https://opendata.dc.gov/>).

QUESTION 14: Assuming we are using <https://opendata.dc.gov> parking meter APIs, in the data set:

- a. Integers for parking meter on time do not make sense. Some of them seem transcribe to integers representing time of day; others are random 2 digit numbers? Can you provide more detail on this value field.
- b. Does the data set exclude meter off times for high usage lanes in applicable areas? 7-9:30a; 4-6:30p respectively.
- c. Knowing that DC is exploring variable meter rates, will this data be provided? Our assumption is \$2.30 for all meters at this point. We do see a field that may relate to pricing or variable pricing, but it is unclear.
- d. Again, assuming the data set above, the meter locations are polydots. Will DDOT provide polygon data around the meter locations/blockfaces, or are providers expected to build these themselves based on the polydot data provided? Our goal as an operator is to provide the most accurate date, with the parameters provided, as possible.

ANSWER 14: The District asks the permittees use the below APIs to determine parking zones and report that parking activity to the District per the Data Reports section.

Please see the below APIs.

- Parking meter locations: <https://opendata.dc.gov/datasets/parking-meters>
- Parking meter policy (meter rates): <https://opendata.dc.gov/datasets/parking-meter-policy>
- Parking pay by space (Chinatown): <https://opendata.dc.gov/datasets/parking-meter-spaces>

Our open data is hosted on Open Data DC (<https://opendata.dc.gov/>).

QUESTION 15: In lieu of in-app localization, and potentially as a better user experience solution, can we offer vendor provided/paid for translation services on an as needed basis?

ANSWER 15: Please see the answer to question 102.

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QUESTION 16: In lieu of in-app localization, and potentially as a better user experience solution, can we offer vendor provided/paid for ADA accessible solutions (text to speech, relay service) on an as needed basis?

ANSWER 16: Permit Holders should meet this requirement to the best of their ability.

QUESTION 17: Are native iOS and Android Accessibility tools sufficient assuming platform compatibility? This appears to exceed the requirements of Americans with Disabilities Act of 1990, Pub. L. No. 101-336, 104 Stat. 328 (1990). Relevant native examples are VoiceOver on iOS, and Talk Back/Select to Speak on Android.

ANSWER 17: Permit Holders should meet this requirement to the best of their ability.

QUESTION 18: Are all reporting requirements and APIs, marked as trade secrets or that contain potential member privacy concerns, inherently publicly available?

ANSWER 18: None of the data requested in this permit will be inherently publicly available.

QUESTION 19: If generally considered private, are reporting requirements and APIs, marked as trade secrets or that contain potential member privacy concerns, subject to FOIA requests?

ANSWER 19: All data shared via this permit is subject to both FOIA requests the related FOIA exemptions. DDOT conducts a thorough review of any data requests to ensure that the data shared via a FOIA request does not fall under any of the standard FOIA exemptions, including the personal privacy exemption and the trade secrets exemption. Please see the link below for more information.

<https://code.dccouncil.us/dc/council/code/sections/2-534.html>

QUESTION 20: To confirm, billing—both for the permit and lost meter revenue—is due monthly?

ANSWER 20: Yes, DDOT will invoice the Permit Holder monthly for the use of public space. These invoices will have Net-30 payment terms.

QUESTION 21: With the requirement to use DC Fleet Ticketing program in mind, will there be a mechanism for transferring liability of parking tickets? Without this, DC residents cannot effectively adjudicate their own violations and this has been a frequent request by DC residents.

ANSWER 21: Permit Holders are expected to manage and be responsible for their customers' behaviors. Carsharing Companies operating under this permit may contest any citations they deem erroneous.

QUESTION 22: When are parties interested in participating in this program supposed to submit legal language suggestions for this permit? When are parties interested in participating in this program supposed to submit general suggestions for this permit?

ANSWER 22: All comments for this permit terms and conditions were due September 5th at 5 PM.

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QUESTION 23: [Referring to 2.1(a) Basic Requirements] Does “qualified drivers” refer to people who qualify to be members, rather than drivers at large?

ANSWER 23: Qualified drivers refers to drivers who qualify to be members of Permit Holder’s service.

QUESTION 24: [Referring to 2.1(b) Committed Service Level] For the two-month deadline to meet Committed Service Level, is this referring to meeting the number of vehicles made available?

ANSWER 24: This language refers to making the required number of vehicles available in the public right-of-way. This requirement is being removed from the 2019 permit terms and conditions.

QUESTION 25: [Referring to 2.1(b) Committed Service Level] For the two utilization requirements, could we specify “in the Metropolitan DC area” or “originating or ending in the Metropolitan DC area”?

ANSWER 25: This permit is concerned with point-to-point carsharing operations in the District’s public right-of-way. This requirement is being removed from the 2019 permit terms and conditions.

QUESTION 26: [Referring to 2.1(b) Committed Service Level] For the first utilization requirement, should that be “the average roadside/curbside parking duration”?

ANSWER 26: This permit is concerned with point-to-point carsharing operations in the District’s public right-of-way. This requirement is being removed from the 2019 permit terms and conditions.

QUESTION 27: [Referring to 2.1(b) Committed Service Level] Will these also apply to reserved-space / two-way carsharing programs?

ANSWER 27: These terms and conditions apply to the on-street point-to-point carsharing program only and do not discuss DDOT's other shared mobility programs.

QUESTION 28: [Referring to 2.1(d) All Eight Wards Service Level] Add to the end: “available for rental or under rental, subject to events of force majeure”

ANSWER 28: This section will remain unchanged for this permit terms and conditions.

QUESTION 29: [Referring to 2.1(e) Other Rebalancing] Would it be possible for the time limit to take into account weather conditions or other factors that are outside our control?

ANSWER 29: This section will remain unchanged for this permit terms and conditions.

QUESTION 30: [Referring to 2.1(e) Other Rebalancing] If DDOT requests relocating vehicles “for any reason,” will there be an opportunity to discuss or request details regarding reasons for the requests?

ANSWER 30: This is a general requirement intended to capture any reason the District would need the Permit Holder to move carsharing vehicles within or from the public right-of-way. Any details about the request would be provided during the actual occurrence.

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QUESTION 31: [Referring to 2.1(g) Accessibility] Can you clarify which parts of the software and website need to be accessible in those languages; just the main interface of all legal documentation, privacy policy, etc.?

ANSWER 31: Please see the answer to question 102.

QUESTION 32: [Referring to 2.1(g) Accessibility] Will there be flexibility here, given the time and process involved in meeting the language requirement?

ANSWER 32: Please see the answer to question 102.

QUESTION 33: [Referring to 2.1(g) Accessibility] Will DDOT define which ADA stipulations are applicable?

ANSWER 33: Permit Holders should meet this requirement to the best of their ability.

QUESTION 34: [Referring to 2.1(h) Carsharing Vehicle Sticker] How long does the process of compliance verification take?

ANSWER 34: The District intends to complete review of permit compliance and issue or deny the permit 5 business days after the applicant signs the permit terms and conditions and submits data and document verification of permit compliance.

QUESTION 35: [Referring to 2.1(h) Carsharing Vehicle Sticker] Can the sticker requirement be waived if a vehicle is wrecked or taken out of service permanently?

ANSWER 35: The requirement to display a Carsharing Vehicle Sticker or participate in an equivalent electronic system applies to vehicles in the public right-of-way in the District. If a vehicle is taken out of service permanently, the sticker it had is no longer valid.

QUESTION 36: [Referring to 2.1(i) Parking Limitations] #5: Would propose adding “but temporary parking with the vehicle operator present in the vehicle is not precluded”?

ANSWER 36: This section has been amended to clarify the requirement.

QUESTION 37: [Referring to 2.1(i) Parking Limitations] #6: Would propose adding “unless the vehicle operator displays his/her handicap permit on the passenger side of the windshield”

ANSWER 37: This section has been amended to clarify the requirement.

QUESTION 38: [Referring to 2.1(i) Parking Limitations] Is the information about zones/times where parking is not allowed (e.g. street sweeping) in a KML or similar format?

ANSWER 38: DDOT will provide additional information on this topic in the future.

QUESTION 39: [Referring to 2.1(k) Vehicle and Fleet Management] #1: it'd be helpful to define what counts reportable suspicious activity and who this is to be reported to

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ANSWER 39: DDOT will provide additional information on this topic in the future.

QUESTION 40: [Referring to 2.1(k) Vehicle and Fleet Management] #2: does this apply to cyber insurance?

ANSWER 40: This refers to any insurance required under the Insurance section of these permit terms and conditions.

QUESTION 41: [Referring to 2.1(k) Vehicle and Fleet Management] Can the name displayed on the Carsharing Vehicle be the Carsharing Company's "doing business as" (DBA) name?

ANSWER 41: Yes.

QUESTION 42: [Referring to 2.1(k) Vehicle and Fleet Management] #5: does this mean no license plate frames?

ANSWER 42: This requirement does not allow any installation that covers the Carsharing Vehicle license plate number and obstructs the view of the license plate number.

QUESTION 43: [Referring to 2.1(k) Vehicle and Fleet Management] #8: could we specify "ensuing from the Carsharing company's service, absent normal wear and tear"?

ANSWER 43: This requirement will remain unchanged for the 2019 permit terms and conditions.

QUESTION 44: [Referring to 2.1(m) Vehicle Registration] Could you confirm if there is a separate cost associated with the Ticket Service Program?

ANSWER 44: The Department of Motor Vehicles (DMV) manages this program. Any questions about the Multi-Vehicle Fleet Ticket Service Program should be directed to the DMV. Resources below.

<https://dmv.dc.gov/service/multi-vehicle-fleet-ticket-service>

[dcfleethelp@conduent.com](mailto:dcfleethelp@conduent.com).

QUESTION 45: [Referring to 2.1(q) Technology] Is DDOT flexible on requiring web reservations? For app-based services like ours, we typically don't offer reservations through the web (although the website would have detailed information on the service and how to use it)

ANSWER 45: This section has been amended to clarify the requirement.

QUESTION 46: [Referring to 2.1(r) Data Standards and Requirements] As this will include sensitive competitive data, could we make it available upon request?

ANSWER 46: This section has been amended to clarify the requirement. All data shared via this permit is subject to both FOIA requests the related FOIA exemptions. DDOT conducts a thorough review of any data requests to ensure that the data shared via a FOIA request does not fall under any of the standard

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FOIA exemptions, including the personal privacy exemption and the trade secrets exemption. Please see the link below for more information.

<https://code.dccouncil.us/dc/council/code/sections/2-534.html>

QUESTION 47: [Referring to 2.1(r) Data Standards and Requirements] Could you clarify if DDOT planning to share this data more widely?

ANSWER 47: None of the data requested in this permit will be inherently publicly available. All data shared via this permit is subject to both FOIA requests the related FOIA exemptions. DDOT conducts a thorough review of any data requests to ensure that the data shared via a FOIA request does not fall under any of the standard FOIA exemptions, including the personal privacy exemption and the trade secrets exemption. Please see the link below for more information.

<https://code.dccouncil.us/dc/council/code/sections/2-534.html>

QUESTION 48: [Referring to 2.1(r) Data Standards and Requirements] What specific types of data need to be shared; any examples? E.g. for “transaction activity”: what exactly is needed?

ANSWER 48: This section has been amended to clarify the requirement.

QUESTION 49: [Referring to 2.1(r) Data Standards and Requirements] Could we get some further information on system/data security standards and the types of third parties that might access this data?

ANSWER 49: This section has been amended to clarify the requirement.

QUESTION 50: [Referring to 2.1(s) Criminal Investigation] #1: Would it be possible to state here that permit holders will comply with all applicable laws?

ANSWER 50: This section has been amended to clarify the requirement.

QUESTION 51: [Referring to 2.1(s) Criminal Investigation] #2: In practice, it would be helpful to know who receives the request and what is the process

ANSWER 51: DDOT will work with the Permit Holder to clarify operational details.

QUESTION 52: [Referring to 2.1(t) Insurance] Section G: does DDOT have liability insurance for protecting customer data shared by permit holders; if so, what are the details?

ANSWER 52: This section has been amended to clarify the requirement.

QUESTION 53: [Referring to 2.1(t) Insurance] #2: will this except cyber insurance? Also, if cyber insurance is required then could we have some leeway on timing as it can be a lengthy process to finalize?

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ANSWER 53: This section has been amended to clarify the requirement.

QUESTION 54: [Referring to 2.1(t) Insurance] #4: it may help to say that it is the obligation of Carsharing Company to provide notice (rather than the insurer, as some insurers will not agree to provide notice directly to a third party)

ANSWER 54: This section has been amended to clarify the requirement.

QUESTION 55: [Referring to 2.1(t) Insurance] #5: could this be only be for the life of the permit rather than 5 years? Also, this mentions Professional Liability, but that's not listed as required insurance for Carsharing Company; could you confirm?

ANSWER 55: This section has been amended to clarify the requirement.

QUESTION 56: [Referring to 2.1(t) Insurance] #7: could this account for incidents outside the permit holder's control?

ANSWER 56: This section has been amended to clarify the requirement.

QUESTION 57: [Referring to 2.2(b) Live Map] Is this to be provided only to DDOT or must this be available generally to the public and customers?

ANSWER 57: This map needs only to be provided to DDOT and does not need to be public-facing.

QUESTION 58: [Referring to 2.2(b) Live Map] Does the map need to list out a count of vehicles per ward, or will dots on a map suffice?

ANSWER 58: The overlay should display a count of Carsharing Vehicles available in each Ward, total Carsharing Vehicles available in the District, and total Carsharing Vehicles located in surrounding jurisdictions.

QUESTION 59: [Referring to 2.2(b) Live Map] For showing vehicles in "surrounding jurisdictions," is there a certain radius around the District that would suffice?

ANSWER 59: This map should capture the activity of any vehicles operating under this permit.

QUESTION 60: [Referring to 2.2(d) Vehicle Location Application Program Interface (API)] Where can we access the parking spots and meter rates API? Are these in one API or separate?

ANSWER 60: The District asks the permittees use the below APIs to determine parking zones and report that parking activity to the District per the Data Reports section.

Please see the below APIs.

Parking meter locations: <https://opendata.dc.gov/datasets/parking-meters>

Parking meter policy (meter rates): <https://opendata.dc.gov/datasets/parking-meter-policy>

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Parking pay by space (Chinatown): <https://opendata.dc.gov/datasets/parking-meter-spaces>

Our open data is hosted on Open Data DC (<https://opendata.dc.gov/>).

QUESTION 61: [Referring to 2.2(d) Vehicle Location Application Program Interface (API)] Are there APIs/files that contain the most updated representation of Wards?

ANSWER 61: Here is the District's Open Data dataset on Ward information.

<https://opendata.dc.gov/datasets/ward-from-2012>

QUESTION 62: [Referring to 2.2(e)ii Data Requirements Trip Data] For (ii) Data Requirements, could we add "if known" to the end of #4?

ANSWER 62: This requirement will remain unchanged for the 2019 permit terms and conditions.

QUESTION 63: [Referring to 2.4(a) Carsharing Vehicle Residential Parking Fees] Will it be prorated for 2019, or is this amount already prorated?

ANSWER 63: The fee for the 2019 permit will reflect the cost of an RPP permit at the beginning of calendar year 2019. The fee is calculated and applied based on days the Permit Holder's vehicles spend in the public right-of-way.

QUESTION 64: [Referring to 2.4(a) Carsharing Vehicle Residential Parking Fees] Is the fee calculated from the date vehicles enter service?

ANSWER 64: The fee is calculated and applied based on days the Permit Holder's vehicles spend in the public right-of-way.

QUESTION 65: [Referring to 2.4(b) Meter Recovery Fees] Does DDOT have an average estimate of meter price per vehicle per month?

ANSWER 65: DDOT cannot provide this projection.

QUESTION 66: [Referring to 2.4(b) Meter Recovery Fees] Can there be more detail, e.g. if vehicles are ticketed or towed, how are meter fees charged?

ANSWER 66: The Meter Recovery Fees are based on time spend at meters and are not related to any citation or towing activity.

QUESTION 67: [Referring to 2.4(b) Meter Recovery Fees] Will the API be dynamic to account for meter pricing changes during weekends, evenings, etc.?

ANSWER 67: The District asks the permittees use the below APIs to determine parking zones and report that parking activity to the District per the Data Reports section.

Please see the below APIs.

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Parking meter locations: <https://opendata.dc.gov/datasets/parking-meters>

Parking meter policy (meter rates): <https://opendata.dc.gov/datasets/parking-meter-policy>

Parking pay by space (Chinatown): <https://opendata.dc.gov/datasets/parking-meter-spaces>

Our open data is hosted on Open Data DC (<https://opendata.dc.gov/>).

QUESTION 68: [Referring to Section 5.1 Monitoring and Records] Would propose adding: “subject to confidentiality and security requirements”

ANSWER 68: This section will remain unchanged for this permit terms and conditions.

QUESTION 69: [Referring to Section 5.2 Assignment] May the permit be pledged to a financial institution for financing purposes?

ANSWER 69: This section will remain unchanged for this permit terms and conditions.

QUESTION 70: [Referring to Section 5.3 Confidential Information] Would propose adding: “except for data generated by the Permit Holder in its business and provided to DDOT as required by the Permit and software developed by Permit Holder, should remain the property of the Permit Holder.”

ANSWER 70: This section will remain unchanged for this permit terms and conditions.

QUESTION 71: [Referring to Section 5.4 Indemnification] Would it be possible to add some specifics to the language here? E.g. to the end of first paragraph: “except if due to the negligence or willful misconduct or violation of law by an indemnified party” and to the end of second paragraph: “except damage to governmental property caused by normal wear and tear or loss or damage to persons or property due to the negligence or willful misconduct or violation of law by an Indemnified Party. In no event will DDOT or Permit Holder be liable for indirect, special, consequential or punitive damages arising out a party’s breach of this Agreement”

ANSWER 71: This section will remain unchanged for this permit terms and conditions.

QUESTION 72: [Referring to Section 5.5 Severance of Terms and Compliance with Applicable Law] Would propose adding: “except that changes in laws, regulations or rules by DDOT shall only apply to the Permit for the following year. DDOT shall provide to the Permit Holder notice of any prospective changes in District laws, regulations, or rules applicable to Point- to-Point Carsharing services in the District’s Public Right-of-Way and the opportunity to comment on them in advance of implementation”

ANSWER 72: This section will remain unchanged for this permit terms and conditions.

QUESTION 73: [Referring to Section 5.7 Remedies] Will there be specific timeframes listed to clarify “reasonable” time periods?

ANSWER 73: This section will remain unchanged for this permit terms and conditions.

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QUESTION 74: [Referring to Article 7. Termination] How long is the intended advance notice, and will Permit Holders have an opportunity to challenge this determination or surrender the permit willingly?

ANSWER 74: The Permit Holder will be given reasonable notice of any termination and given the opportunity to respond. The Permit Holder may surrender the permit willingly at any time.

QUESTION 75: [Referring to 2.1(b) Committed Service Level] Please clarify that the six hundred (600) Carsharing Vehicle cap applies to the number of vehicles operating in D.C. at a given time, not the entire registered fleet of the Carsharing Company. Is it necessary to have a cap? Due to high the high cost of capital assets we believe this makes a cap unnecessary as carshare organizations will only increase the fleet size if the demand requires it.

ANSWER 75: The 600 vehicle cap applies only to vehicles operating in the District's public right of way. The cap is not intended to arbitrarily limit the number of vehicles a Permit Holder can deploy. The vehicle cap, coupled with an option to increase the vehicle cap through proven utilization, ensures that Permit Holders are using the public right of way in an efficient manner.

QUESTION 76: [Referring to 2.1(b) Committed Service Level] Upon further discussion if a vehicle cap is deemed necessary, the Carsharing Company suggests adjusting the additional vehicle infleet cap from 50-100 to 25-200 per permit year to allow for growth as long as average parking duration metrics are being met.

ANSWER 76: This section has been amended to clarify the requirement. DDOT will continue to monitor this program to determine if the number of additional vehicles allowed under a utilization-driven cap increase should be amended.

QUESTION 77: [Referring to 2.1(b) Committed Service Level] The Carsharing Company believes the frequency of revenue-generating trips is not an appropriate or necessarily useful metric to determine if it is in the mutual interest of DDOT, the Carsharing Company, and the public to increase the level of service. Service requirements vary by vehicle location and vehicle type, notably with electric vehicles, and the Carsharing Company shouldn't be incentivized to provide less service to vehicles. However, average parking duration as a measurement is acceptable as it is a truer metric on curbside usage.

ANSWER 77: This requirement is being removed from the 2019 permit terms and conditions. The District will continue to work to better monitor the usage of public space and will consider different curb utilization metrics in the future.

QUESTION 78: [Referring to 2.1(c) Committed Service Level Rebalancing] The Carsharing Company cannot guarantee a minimum level of vehicles beyond what is stated in 2.1(b) due to the nature of the acquisition and release of automobiles as well as the federally-mandated requirements to respond to vehicle recalls and vehicle maintenance. However, the requirement to keep at least one percent (1%) of all vehicles in each Ward as specified in 2.1(d) is acceptable.

ANSWER 78: This requirement is being removed from the 2019 permit terms and conditions.

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QUESTION 79: [Referring to 2.1(e) Other Rebalancing] In order to appropriately serve the variety of needs of residents in all eight wards, the maximum idle time should be based off historical data where the Carsharing Company is successfully meeting the needs of residents in all eight wards. The recently released shared moped regulations limits idle time to five (5) days, which is also appropriate for all other vehicles using curbside space, including Carsharing Vehicles. Imposing a 24 hour maximum would effectively incentivize the Carsharing Company to rebalance to a minimum amount of vehicles in wards that currently use carsharing less.

ANSWER 79: The intent of the 24-hour requirement is to allow residents to access, at intervals, any spot on their block, while not being overly restrictive on the Permit Holder's operations. The five (5) day requirement for shared motor-driven cycles is for a different program and does not apply to point-to-point carsharing operations.

QUESTION 80: [Referring to 2.1(e) Other Rebalancing] The Carsharing Company will relocate Carsharing Vehicles for any reason upon DDOT's request. However, the Carsharing Company, similar to residents who own vehicles and store them in public space, cannot always respond "within four (4) hours". If a Carsharing Vehicle is parked illegally, enforcement should treat it at parity with other vehicles and fines imposed as appropriate

ANSWER 80: This is a general requirement intended to capture any reason the District would need the Permit Holder to move carsharing vehicles within or from the public right-of-way. This section does not only apply to vehicles parked illegally and requires the Permit Holder to move any vehicles in public space at DDOT's request, including times when the Permit Holder's vehicles need to be moved at short notice.

QUESTION 81: [Referring to 2.1(g) Accessibility] The Carsharing Company currently has a wide range of languages supported on its website, app, vehicles, and call center. While the Carsharing Company is not a "Covered entity" in the D.C. Language Access Act of 2004, it continues to expand upon the number of languages it supports.

ANSWER 81: Please see the answer to question 102.

QUESTION 82: [Referring to 2.1(i) Parking Limitations, 2. ] The Carsharing Company believes carsharing vehicles and members shall abide by the same laws as personally owned vehicles in terms of rush hour restrictions. As an example, disallowing vehicles to be used in legal parking spots unfairly targets Carsharing members who use vehicles to visit District businesses and restaurants on weekends that are on major corridors as well as those who attend religious services near streets with weekday rush hour restrictions.

ANSWER 82: This section has been amended to clarify the requirement.

QUESTION 83: [Referring to 2.1(k) Vehicle and Fleet Management, 1. ] Procedures and instructions are in the Carsharing app so they are always accessible and appropriately updated. They are not in the form of posted notices in the interior of the vehicle. Carsharing members should call 911 in case of emergencies.

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ANSWER 83: The ability to access emergency instruction via a phone does not replace the requirement to access physical emergency instructions. There is no language here prohibiting the Permit Holder from instructing its users to contact 911.

QUESTION 84: [Referring to 2.1(o) Customer Service Requirements] Customer service is available via the app, phone, and email. The contact information is in the app and on the website, but not necessarily displayed in the vehicle.

ANSWER 84: The requirement to display this contact information is for both those that use the service and those that do not use the service. When people want to report a vehicle in their neighborhood, they need to be able to see the number to call without having to search the Internet for that number.

QUESTION 85: [Referring to 2.1(o) Customer Service Requirements] There is no differentiation between our member services number and a “trouble call” number.

ANSWER 85: Please see the answer to question 99.

QUESTION 86: [Referring to 2.1(o) Customer Service Requirements] Please define. Do the community meetings in each Ward refer to presentations at Advisory Neighborhood Commission (ANC) meetings? Are they separate meetings held by DDOT? Why not allow meetings to be completed through the end of the permit year rather by the end of the eighth (8th) month?

ANSWER 86: DDOT is not holding separate meetings for this purpose. Advisory Neighborhood Commission (ANC) meetings are adequate to meet this requirement. DDOT allowed eight (8) months to complete this requirement to give the Permit Holders adequate time to attend meetings in all eight (8) wards.

QUESTION 87: [Referring to 2.1(p) Advertising] Please define other advertisement media in the Public Right-of-Way.

ANSWER 87: This section has been amended to clarify the requirement.

QUESTION 88: [Referring to 2.1(q) Technology] Real-Time information about the available Carsharing vehicles is available on the carsharing app, not on the website.

ANSWER 88: This section has been amended to clarify the requirement.

QUESTION 89: [Referring to 2.1(r) Data Standards and Requirements] The Carsharing Company cannot provide DDOT or a third-party data platform full access to transaction activity.

ANSWER 89: This section has been amended to clarify the requirement.

QUESTION 90: [Referring to 2.1(r) Data Standards and Requirements] There is no integration between the Carsharing Company and DDOT’s systems, so no reporting to any change to Carsharing Company’s software is not needed.

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ANSWER 90: This section only concerns changes to the Permit Holder's software that impacts the ability of DDOT to consume the data that the Permit Holder is required to provide per this Permit.

QUESTION 91: [Referring to 2.2(a) Community Outreach Sign-In Sheets] Dependent on the type of community outreach that we have asked for clarification on in Section 2.1(o) the Carsharing Company is concerned that D.C. residents might not want their personal information shared with a public or private entity without advanced notice.

ANSWER 91: This section asks for verification that the Permit Holder met the community meeting requirement in the Customer Service Requirements section of the permit terms and conditions. The sign-in sheet does not have to display the personal information of any of the attendees, as long as it supports that the Permit Holder's attended the meeting.

QUESTION 92: [Referring to 2.2(b) Live Map] Carsharing Company provides an app that displays available vehicles. DDOT can determine availability by Ward and in surrounding jurisdictions by using the API in 2.2(d).

ANSWER 92: The Live Map is a standardized permit enforcement and monitoring tool. Individual Permit Holder's apps do not meet the needs of the District. Section 2.2(d) has been amended in the 2019 permit terms and conditions to clarify the requirement.

QUESTION 93: [Referring to 2.2(d) Vehicle Location Application Program Interface (API)] The API uses open standards and will be made available to DDOT. The Carsharing Company is not responsible for compatibility with DDOT's systems. The API will not be posted on the Carsharing Company's website and only available to entities at the Carsharing Company's discretion. Carsharing data is not available in GBFS.

ANSWER 93: This requirement is being removed from the 2019 permit terms and conditions.

QUESTION 94: [Referring to 2.2(e) Data Reports] The proposed reports in this section are divorced from the realities of the Carsharing Company. The Carsharing Company will provide DDOT parking and fleet reports.

ANSWER 94: This requirement will remain unchanged for the 2019 permit terms and conditions. More information on why the District asks for the data required under this permit and how the District uses the data required under this permit are available on the District's On-Street Carsharing Program website, under DDOT's Point-to-Point Carsharing Data Guide.

QUESTION 95: [Referring to 2.4(a) Carsharing Vehicle Residential Parking Fees] The Carsharing Company is currently paying DDOT a fair rate based off data on how much vehicles use residential zones and meters. The Carsharing Company is open to changing to a flat rate for RPP that is based off data. However, the proposal arbitrarily raises the RPP to eight times that of personally-owned vehicle even though a car can only be parked at one place at one time. Considering how the Carsharing Company has proven to optimize the turnover of curbside space in RPP zones, the Carsharing Company has proven to

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remove and suppress the purchase of thousands of vehicles in the District, and noting that personally-owned vehicles are generally parked 95% of the time, Carsharing Company should not be charged unfairly compared to personally-owned vehicles for RPP access for District residents. Due to the fact that carsharing helps the District reach its congestion goals we believe an appropriate fee would be under the \$35 that personally owned vehicles pay, not above.

ANSWER 95: This residential parking fee in the Point-to-Point Carsharing Program's permit language has always been the cost of a standard Residential Permit Parking (RPP) permit times eight (8). The language here just reaffirms that this fee will continue to be a part of this program.

The permit and the related fee are for the permission to park only. It does not guarantee parking for resident vehicles or carsharing vehicles and it is not related to actual parking activity for resident vehicles or carsharing vehicles.

The District has established that the privilege of parking more than two (2) hours in an RPP zone currently comes at a cost of \$35 a year. For these privileges in eight (8) zones, that cost is \$35 x 8. We do not offer residents the opportunity to pay RPP fees based on their percentage of usage of RPP curbside, nor do we offer them the opportunity to opt-in to other zone's RPP by paying in additional increments of \$35.

QUESTION 96: Do all holders of the Carsharing Vehicle Sticker, regardless if they are in the point-to-point carsharing program or not, required to pay the same Carsharing Vehicle Residential Parking Fees and Meter Recovery Fees?

ANSWER 96: These terms and conditions apply to the on-street point-to-point carsharing program only and do not discuss DDOT's other shared mobility programs.

QUESTION 97: What does the 600 vehicle cap in the Committed Service Level reference to?

ANSWER 97: The upper vehicle cap, 600 in this permit, applies only to vehicles in public space in the District.

QUESTION 98: What is the need to provide the data that DDOT has requested in this permit, and what is the need to provide the data requested in the format requested?

ANSWER 98: The data required in this permit serves a variety of functions, including permit monitoring and enforcement. The format is a standard format for all point-to-point carsharing data shared with the District. More information on why the District asks for the data required under this permit and how the District uses the data required under this permit are available on the District's On-Street Carsharing Program website, under DDOT's Point-to-Point Carsharing Data Guide.

QUESTION 99: Is there a need for a specific trouble-call number, separate from the customer service number?

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ANSWER 99: The customer service number and “trouble call” number referenced in 2.1(o) Customer Service Requirements may be the same, as long as that single number fills the requirements listed for both the “trouble call” number and the customer service number.

QUESTION 100: What kind of meetings meet the Community Engagement meetings requirement?

ANSWER 100: Advisory Neighborhood Commission (ANC) meetings or a similar neighborhood or community meeting are adequate to meet this requirement.

QUESTION 101: Does DDOT anticipate any big changes to the 2020 permit?

ANSWER 101: DDOT is always working to improve the On-Street Carsharing Program. DDOT is looking to the Open Mobility Foundation and Mobility Data Standards on how to standardize carsharing data among cities and providers. In the absence of that, the 2020 permit will look at how DDOT can better receive the data provided via this permit and how DDOT can better monitor and analyze the usage of public space.

QUESTION 102: What is the best way to go about implementing the language access requirements of this permit?

ANSWER 102: The Permit Holder should translate major public facing content, which includes primary app and website pages. For other public facing content, the Permit Holder should add taglines in each language which allow a user to request the translation of that document and translate said document if the Permit Holder receives a compelling number of requests to do so.

QUESTION 103: [Referring to 2.1(s) Criminal Investigation] To ensure member privacy, Carsharing Vehicle and member data is shared by Carsharing Company on a case-by-case basis, based on internal Carsharing Company procedures. In the event Permit Holder’s Carsharing Vehicles are involved in criminal activity and the proper legal request documentation is supplied by authorities (i.e.: a Subpoena), Permit Holder will provide the authorities with information subject to the Carsharing Company’s internal procedures and the District and federal laws as deemed appropriate.

ANSWER 103: This section has been amended to clarify the requirement.