

Dockless Vehicle Rules & Regulations

Public Comment Report



OVERVIEW

The Baltimore City Department of Transportation (BCDOT) released the proposed Rules and Regulations (R&R) for the Dockless Vehicle for Hire Permit on April 1, 2021. This release and public comment period complied with the new Administrative Procedure Act regulations. BCDOT accepted and reviewed public comment on the R & R until May 5, 2021 to fulfill the required 30 days of public comment required in City Code Section §38-3. Comments were accepted via voicemail, email, comments on the BCDOT webpage, comments on the Law Department webpage, or delivered to BCDOT offices.

These R & R are only one aspect of the new permitted program and are designed to:

- Regulate commerce on the public right of way (ROW), just like any other business.
- Determine where vehicles are permitted to operate, in order to protect health and safety of the public.
- To assure that the entire public can interact with this service operating in the ROW, whether that is in using vehicles, interacting with them, or reporting an issue with the permit holder.

For more information about the full program visit: <https://transportation.baltimorecity.gov/bike-baltimore/dockless-vehicles> .

Over the course of the public comment period, BCDOT received 44 comments on the R&R. In addition to comments from the general public, BCDOT received comments from potential permit applicants, national groups, and local stakeholder groups representing different interests of the Baltimore community. Out of all the comments 24 (54.5%) were submitted via email, 11 (25%) were conveyed during private stakeholder meetings, 6 (13.6%) were from the public Dockless Vehicle Committee meeting, 2 (4.5%) came from the BCDOT webpage comment box, and 1 (2.3%) was received as a voicemail. BCDOT did not track demographic or identifying information from commenters.

PUBLIC COMMENT SUBMISSIONS

The following table shows comments sorted by the section in which they appear in the Rules and Regulation, as well as the BCDOT response to those comments.

R&R Section	Submission	Comment Summary	BCDOT Response
Adoption, Applicability, and Scope of Regulations	Email	There should be two permits guaranteed for operators with two vehicle types, not just reserved	Permits will be awarded based on a competitive application process. Permits for having multiple vehicle types are not guaranteed. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	Email	Permit should be 2 years instead of 1 year, with an annual evaluation of whether more permits are needed.	The proposed regulations allow for a renewal given compliance and approval. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	Email	Specify that "Director" refers to the DOT Director	BCDOT will make this edit.

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Adoption, Applicability, and Scope of Regulations	Email	BCDOT should work collaboratively with permit holders before issuing penalties.	In practice, BCDOT works collaboratively and issues several warning before issuing penalties. This clause is a last resort approach and no additional changes will be made.
Definitions	Email	Fleet should include non-operational vehicles in the ROW.	BCDOT will make this change.
Definitions	Public Meeting	Equity zones should be advertised to riders	Equity Zones all have parking corrals which appear in the app and riders can see the vehicles deployed there daily. No additional changes will be made.
Standards for vehicles	Stakeholder meeting	Compliance timeline for vehicles which do not meet standards should be 90 days or even 6 months so that new vehicles can be transitioned in over the winter. Supply chains are backed up and a shorted timeline could reduce services. A hybrid fleet could also be an option.	BCDOT will change this section to allow for compliance timelines based on the extent of standards, small cosmetic changes will be given 60 days, substantial changes will be allowed up to 6 months for compliance.
Standards for vehicles	Stakeholder meeting	Weight limit should be different for different vehicle types.	BCDOT is still tracking this issue and only knows of one city with a limit below 75 lbs. No additional changes will be made.
Standards for vehicles	Email	The weight limit for scooters should be lower than that for bikes, recommend 60 lbs.	BCDOT is still tracking this issue and only knows of one city with a limit below 75 lbs. No additional changes will be made.
Standards for vehicles	Voicemail	The scooters in DC seem to be better on bumps, seems to be because the wheels are bigger.	BCDOT will keep the 9 inch wheel size requirement, this is 1 inch larger than some vehicles currently in use around Baltimore.
Standards for vehicles	Stakeholder meeting	Tire size benefits are not 100% proven, some users like smaller wheels for maneuverability.	Larger wheels are proven to handle potholes better when hit. BCDOT will keep the wheel size requirement since this is better for safety. This is especially better for novice riders who are more likely to be involved in a crash.
Standards for vehicles	Email	The larger wheel requirement is a good idea and is aligned with the industry's inclusion of larger wheels for new vehicles. The larger tires have been found to perform better in urban environments such as Baltimore and increase the maximum load capacity, allowing various sizes to experience shared e-scooters.	BCDOT agrees, no additional changes will be made.
Standards for vehicles	Stakeholder meeting	It is good to have consistent decal requirements with nearby cities, this change should be kept.	BCDOT will keep this new requirement which matches requirements in the DC metro area.
Standards for vehicles	Email	Speedometers are redundant for vehicles which have speed governors.	Speedometers are necessary for a rider to monitor their own speed. Baltimore City law requires a slower speed which riding on a sidewalk or shared path, this is not regulated through the speed governor, so riders will need to use the speedometer. No additional changes will be made.
Standards for vehicles	Public meeting	Permit holders should develop ways to prevent tampering with speed governors	This is covered in the section of the rules about hacking and tampering with vehicles, no change is needed to this section.
Standards for vehicles	Email	Vehicle inspections should be required before awarding a permit to evaluate standards and geo-fencing.	BCDOT staff regularly rides and tests vehicles in Baltimore and neighboring municipalities. No additional changes will be made.

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Standards for vehicles	Email	Baltimore should consider requiring advanced battery safety features such as a minimum of IP67 Certification. IP67-certified batteries are dust-tight and can survive immersion in Water.	BCDOT will ask about this on the permit application in order to assess requiring this on future permits. No additional changes will be made.
Standards for fleet size	Stakeholder meeting	There should be a lower limit for second vehicle types during winter months. Especially with vandalism, bicycle fleets are hard to maintain. Rather than 150, there should be a 75 vehicle minimum	BCDOT will require a 75 fleet minimum, but not allow the higher overall fleet cap unless there are 150 vehicles of the second type.
Standards for fleet size	Email	The metrics for fleet increases should be clarified	BCDOT will clarify that fleet increase criteria will be shared quarterly.
Standards for deployment	Email	The NE deployment district should be merged with another. Maximum fleet % should be higher to reflect demand.	Considering Morgan State University's return to campus planned for Fall 2021, this change is not warranted. No additional changes will be made.
Standards for deployment	Public meeting	The city should consider public libraries for deployment	BCDOT considered libraries when designating equity zones and will continue to encourage deployment to libraries, but there is no change necessary to these rules.
Standards for deployment	Online form	Several grammatical errors noted	BCDOT will make these edits.
Standards for deployment	Stakeholder meeting	Request for deployment exemptions should be accepted immediately without the 5 days' notice for safety issues	BCDOT will makes this change.
Standards for parking and operations	Email	More needs to be done to stop vehicles from littering the sidewalk	BCDOT has several new regulations that address this: new corral deployment requirements, updates to parking inspection procedures, incentivizing anti-tipping vehicles, and user quizzes about parking laws. No additional changes will be made.
Standards for parking and operations	Stakeholder meeting	Question about where vehicles can be ridden	BCDOT will require easier access to laws for users so that this question can be easily answers. No additional changes will be made.
Standards for parking and operations	Online form	Grammatical error noted	BCDOT will make this edit.
Standards for seizure	Email	Response time should be longer if the requests for repositioning are submitted overnight.	BCDOT does not regularly report vehicles outside of business hours, any such reporting would be an emergency and necessitate a 3-hour response timeline. No additional changes will be made.
Standards for seizure	Email	Specify that pictures will be taken of the illegally parked vehicles before they are towed, not just the location.	BCDOT will make this edit.
Standards for User Education and Engagement	Email	More needs to be done to teach courteous riding, riders zip very close to people walking	BCDOT has several new regulations that address this: user quizzes about riding laws and more educational event requirements. No additional changes necessary.

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Standards for User Education and Engagement	Public meeting	The required quiz should only be 5 questions so it does not deter new riders. Questions should not all be yes/no.	BCDOT will makes this change.
Standards for User Education and Engagement	Stakeholder meeting	The required quiz should only be 5 questions.	BCDOT will makes this change.
Standards for User Education and Engagement	Stakeholder meeting	The required quiz should be 5 questions and should be taken within the first 3 rides and should be repeated semi-regularly.	BCDOT will makes this change.
Standards for User Education and Engagement	Public meeting	Permit holders should consider hosting community events at recreation centers and libraries.	BCDOT will share any planned events with permit holders so they can partner with existing events at libraries or other locations. No additional changes necessary.
Standards for Equitable Dockless Vehicle Access	Public meeting	Residential area or zip code should be added to the list of traits pricing cannot be based on.	This is already covered in a preceding regulation
Standards for Data and Reporting	Stakeholder meeting	GPS data with 30 second transmission should only be while vehicles are on trip and should be under the MDS specifications.	BCDOT will make this edit.
Standards for Data and Reporting	Email	GPS data with 30 second transmission should only be while vehicles are on trip.	BCDOT will make this edit.
Standards for Data and Reporting	Email	Grammatical error in the publicly accessible API section.	BCDOT will make this edit
Standards for Data and Reporting	Email	Permit holders should be a party to any agreement with 3 rd parties to share MDS Data	BCDOT will include this change to allow for Permit Holder review.
Standards for Data and Reporting	Email	MOUs with third parties need to include a provision to aggregate data to a heat map level, not individual data	BCDOT will specify a level of aggregation with obscures personally identifiable data
Standards for Data and Reporting	Email	Recommend replacing "Reports on any crashes involving Permit Holder's Dockless Vehicles with "Incidents involving reported medical treatment."	BCDOT is still researching crash causes for this new vehicle type. Reporting of all crashes, regardless of injury, is needed for research. No additional changes will be made.
Standards for Data and Reporting	Stakeholder meeting	Monthly reporting should specify the types of customer complaints to include- i.e. twitter and social media	BCDOT will edit this section to clarify the types of complaints to be reported.
Standards for insurance	Email	Delete the word "sole"" from E.	This is standard language for the City of Baltimore, no changes will be made.
General	Email	Fleet size, Parking, Education, Distribution and Equity of Access - More attention should be paid to all of these topics. Riders sometimes operate vehicles erratically.	BCDOT addresses these concerns in the proposed R&R
General	Email	DOT should favor applicants with similar operations other cities based on fleet size, weather, and desired equity programs.	BCDOT has developed a robust scoring process which reflects this, no changes necessary on the R&R.