



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking on  
Regulations Relating to Passenger  
Carriers, Ridesharing, and New Online-  
Enabled Transportation Services

Rulemaking 12-12-011  
(Filed December 20, 2012)

**OPENING COMMENTS OF THE LOS ANGELES DEPARTMENT OF  
TRANSPORTATION TO ORDER INSTITUTING  
RULEMAKING 12-12-011**

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**I. Introduction**

In accordance with Rule 6.2 of the California Public Utilities Commission (“Commission” or “CPUC”) Rules of Practice and Procedure (“Rules”), the Los Angeles Department of Transportation (LADOT) submits comments to the Order Instituting Rulemaking 12-12-011 (“Rulemaking”).

**II. Comments**

The following comments address questions related to Transportation Network Company (TNC) data reporting requirements outlined in tables A-C as set forth in the Assigned Commissioner’s Ruling Seeking Comments on Proposed Data Requirements.

**A. Proposed data requirements to be reported by TNCs**

The Los Angeles Department of Transportation (LADOT) supports the CPUC’s decision to increase the frequency of TNC data reporting from annual to quarterly submission. LADOT recognizes this as an important step to help TNC services support city and state policy goals pertaining to safety, sustainability, equity, and accessibility, and to ensure that they abide by

local laws. However, additional clarity on the type of data shared with government agencies, as well as the frequency and process for sharing is needed.

It is unclear from the Assigned Commissioner's Ruling Seeking Comments on Proposed Data Requirements whether TNC data provided quarterly to the CPUC will be provided directly to city governments at the time of submission. If all data must be accessed through the CPUC's public website, it is also unclear whether that data will be made immediately available on a quarterly basis and provided in its original form, or in the aggregated analysis currently provided by the CPUC on an annual basis. Accordingly, LADOT seeks clarity on the frequency, form, and mechanism by which the CPUC will provide data to city governments.

LADOT also seeks clarity on the level of data aggregation both by time and geography. Trends based on time of day, day of week, seasonal conditions, or corresponding to regular and irregular events allows city agencies like LADOT to understand and plan for a more complete range of conditions. By providing quarterly aggregations, the CPUC will dilute the value of data shared with cities. Similarly, data that is aggregated beyond city and/or region distinction lacks the specificity required for cities to understand TNC impacts and manage accordingly. As detailed in comments made in Track 3 of the Commissioner's Amended Phase III. B. Scoping Memo and Ruling, LADOT advocates for publicly available, anonymized trip data that is shared in real time.<sup>1</sup> Here, we further advocate that data be geographically distinct.

LADOT appreciates the Commission's expansion of data requirements pursuant to party comments made in Track 3 of the Commissioner's Amended Phase III. B. Scoping Memo and Ruling. Vehicle Miles Traveled (VMT) data for periods 1, 2, and 3 of TNC service, as well as vehicle occupancy rates, will provide much needed insight into the effect TNCs have on the congestion of city streets, and inform related planning and policy. Continued data collection pertaining to TNCs' ability to meet accessibility requirements will also ensure TNC service is provided to all users. It is not clear from the information provided in Table A whether the CPUC will also continue to collect data including service by zip code, problems with drivers, hours and miles logged by drivers, or driver training course completion as it currently does.<sup>2</sup> In addition to the data listed in Table A, these existing data sets are crucial for ensuring public safety and

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<sup>1</sup> Los Angeles Department of Transportation Opening Comments on Amended Phase III. B. Scoping Memo and Ruling of Assigned Commissioner Track III

<sup>2</sup> <http://www.cpuc.ca.gov/General.aspx?id=3989>

equitable service. LADOT encourages the Commission to continue collecting this data from TNCs, and requests that it too be shared publicly with the data listed in Table A. We refer to the specific data requests made by LADOT and other city agencies in both opening and reply comments of Track 3 of this proceeding for additional recommendations.

### **B. Proposed submission requirements for data reporting**

LADOT supports the CPUC's decision to require that all TNC data be submitted in a format that is common, consistent, and ready for immediate publication. Data that is provided in uniform format allows for efficient and accurate comparison and analysis, and will provide the strongest tool for cities to fulfill their responsibility to manage the public right of way. The CPUC's effort to create that tool is appreciated.

To develop a shared data language across modes in the City of Los Angeles, LADOT recently implemented Mobility Data Specifications (MDS).<sup>3</sup> MDS goes beyond the CPUC's proposed quarterly spreadsheet submission to provide a consistent format for sharing real time data. This allows cities to analyze trends across modes to gather a complete picture of the activity and demand on its streets to actively and effectively manage the public right of way. MDS was created in open source and allows cities and operators to collaborate and come to consensus on data sharing best practices. MDS does not require or expose any personally identifiable information, and can be designed to conform to additional data handling guidelines. To date, 5 cities have contributed to the design of MDS, and over 20 cities nationwide have adopted it into their policies and use it to manage transportation services. In California these cities include Los Angeles, Oakland, San Diego, San Francisco, San Jose, and Santa Monica. The City of Los Angeles will continue to pilot MDS through its upcoming Dockless Mobility Pilot program to manage the movement of dockless shared mobility devices in the public right of way, and LADOT plans to expand its application to additional fleets including DASH buses, BlueLA carshare services, and future dockless modes. As contributors to MDS design and applicants to the City of Los Angeles Dockless Mobility Pilot, TNCs Lyft and Uber, and their subsidiaries, have an in depth understanding of, and are committed to conforming to MDS requirements for their dockless devices operating in Los Angeles. To create a common form of data submission that is shared by cities across California and is embedded in additional

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<sup>3</sup> <https://github.com/CityOfLosAngeles/mobility-data-specification>

requirements for TNCs and their subsidiaries, LADOT recommends that the CPUC implement Provider MDS to receive and share TNC data.

### **C. Additional questions related to TNC data requirements**

Annual data reporting does not meet the frequency with which city governments and other agencies require information, and LADOT recommends the CPUC revise the frequency of its data reporting requirements. While annual or quarterly data offers some insight into TNC use and its effect on cities, it is a retroactive insight that does not provide the perspective and information necessary to effectively manage the public right of way. In its Dockless Mobility Pilot, the City of Los Angeles requires real time data sharing from all new, existing, and future dockless operators. This provides for active management and proactive planning, and represents the necessary frequency of data sharing for LADOT to fulfill its responsibility to promote safety, relieve congestion, and improve quality of life for the residents of Los Angeles.

As outlined previously in these comments, LADOT requests that the CPUC not limit the data it shares publicly to that listed in Table A, but instead share all TNC data that is provided to it. Further, comments provided in Track 3 of the Commissioner's Amended Phase III. B. Scoping Memo and Ruling requested additional data reporting to meet public safety and consumer protection goals, as well as additional policy goals established at both the city and state level. In the City of Los Angeles, all permitted dockless shared mobility operators are required to provide the following data, which we recommend the CPUC require of TNCs:

- Vehicle type
- Trip duration
- Trip distance
- Trip origin
- Trip destination
- Trip route (partial)
- Trip start time
- Trip end time
- Trip cost

### **III. Conclusion**

LADOT recognizes the work the Commission has done to regulate TNCs to help achieve policy goals pertaining to safety, sustainability, equity, and accessibility, and appreciates the

developments in data sharing practices as outlined in the Assigned Commissioner's Ruling Seeking Comments on Proposed Data Requirements. We recommend the CPUC expand the data it requires from TNCs, share all reported data with city governments, and consider greater frequency in receiving and sharing that data. To manage this new data sharing process in the most efficient manner possible, we further recommend that the CPUC implement Provider MDS.

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Respectfully submitted,

/s/ Seleta Reynolds

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