

# Dockless Vehicle Rules & Regulations

## 2022 Revisions - 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 March 15, 2022. 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 April 15, 2022 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 permit 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 28 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 7 (25%) were submitted via email, 1 (4%) were conveyed during private stakeholder meetings, 20 (71%) were from the public Dockless Vehicle Committee meeting, and 0 (0%) 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	BCDOT Response
Adoption, Applicability, and Scope of Regulations	Email	Are you guys wedded to the 3 operators at this point, or is it still up in the air on whether you would allow 4? Also, wondering about your interest in scheduling the demo for Bird in late April / early May?	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one vehicle type and an adaptive vehicle program. No additional changes will be made.  At this time, DVC meetings will remain virtual.

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R&R Section	Submission	Comment	BCDOT Response
Adoption, Applicability, and Scope of Regulations	DVC Meeting	2 [permit holders] will allow longer term healthier program instead of multiple well-funded businesses throwing money at a market and then leaving.	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one vehicle type and an adaptive vehicle program. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	3 [permit holders]. Better accountability.	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one vehicle type and an adaptive vehicle program. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	3-4 [permit holders] as industry is still growing.	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one vehicle type and an adaptive vehicle program. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	Fewer operators. 2 max.	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one vehicle type and an adaptive vehicle program. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	Best to keep the option to select 4 [permit holders] this year to give residents more options (bikes, adaptive vehicles, etc.)	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one vehicle type and an adaptive vehicle program. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	Fewer operators with larger vehicle offerings.	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one

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			vehicle type and an adaptive vehicle program. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	Either 2 operators max or unlimited operators and a city bike share program.	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one vehicle type and an adaptive vehicle program. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	The city should be subsidizing obviously successful programs that have demonstrated their utility and need. If this means fewer operators, so be it.	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one vehicle type and an adaptive vehicle program. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	Fewer operators should come with more stringent requirements for multiple vehicle types like a large bike fleet.	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one vehicle type and an adaptive vehicle program. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	Up to 4 operators allows the city to figure out what truly works best.	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one vehicle type and an adaptive vehicle program. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	More corrals on streets, remove more car parking. Take a spot on every block zoned C-1 and above R-8. Lock-to is terrible.	BCDOT is working to add more parking corrals this spring and summer. Corral locations are identified by reviewing ridership trends. Corrals will be installed in areas of high ridership and with high concentrations of Dockless Vehicles. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	Larger vehicle offerings equal more vehicle types.	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to

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			maintain a daily fleet of two or more vehicle types or one vehicle type and an adaptive vehicle program. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	If community is concerned about parking issues they need to accept losing car parking to add safe scooter parking.	BCDOT is working to add more parking corrals this spring and summer. Corral locations are identified by reviewing ridership trends. Corrals will be installed in areas of high ridership and with high concentrations of Dockless Vehicles. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	More operators allows BCDOT to ensure they are getting the latest in safety technologies as industry continues to innovate. Locking into limited options limits latest in safety innovation for BCDOT.	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one vehicle type and an adaptive vehicle program. No additional changes will be made.
Adoption, Applicability, and Scope of Regulations	DVC Meeting	3-4 [permit holders]	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one vehicle type and an adaptive vehicle program. No additional changes will be made.
Standards for Vehicles	Email	Bird recommends including a waiver process for adaptive micromobility options that may weigh over 100 lbs. While our BirdThree e-scooter and Bird Bike e-bike both weigh under 100 lbs, some adaptive vehicles models may weigh more. Bird believes in making micromobility accessible for everyone and we want to ensure that adaptive vehicles are able to operate throughout the city of Baltimore, whether they meet this vehicle weight standard or not.	Adaptive vehicles are not subject to the weight limit. BCDOT tests and approves adaptive vehicles individually. No additional changes will be made.
Standards for Fleet Size	Email	Bird recommends that the city of Baltimore retain the option to choose up to four operators instead of reducing the maximum number of companies to three. Having a cap of four provides more flexibility for BCDOT to choose operators that offer a multimodal fleet to best suit the	BCDOT will issue up to three Dockless Vehicles permits annually and based on a competitive application process and will reserve two permits for providers that commit to maintain a daily fleet of two or more vehicle types or one

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		<p>micromobility needs of the city. BCDOT would still have the option to choose just three operators, as happened in 2021, based on the quality of applications it receives.</p> <p>While the industry has matured, there is still a high level of uncertainty as established operators have gone out of business or been acquired by other companies. As micromobility has become a transportation option that Baltimore residents rely on, a greater number of operators will allow Baltimore to avoid disruption in service should an operator experience difficulties. Bird suggests waiting for future longer-term contracts to reduce the number of operators; having more operators in the meantime allows BCDOT to better evaluate which operators are the right fit for the city going forward.</p>	<p>vehicle type and an adaptive vehicle program. No additional changes will be made.</p>
Standards for Parking and Operation	Meeting	<p>On page 10 –change physical check to a mechanical check</p> <p>C. If a Dockless Vehicle has been parked at the same location and not ridden for five consecutive days, Permit Holder shall: (1) physically check the Dockless Vehicle; (2) relocate the Dockless Vehicle to another Block Face; or (3) physically check the Dockless Vehicles and relocate the Dockless vehicle to another Block Face</p>	<p>BCDOT will make this change.</p>
Standards for Parking and Operation	Email	<p>Please incorporate the law utilized in DC that requires shared dockless vehicles to be locked to bike racks. This greatly reduces the amount of clutter on sidewalks while also reducing the amount of vandalism and e-waste produced when thrown around while parked.</p>	<p>BCDOT reviewed the ‘lock-to’ requirement implemented in DC. At this time, BCDOT will not be implementing the ‘lock-to’ requirement without commitment to increase the number of bike racks in the city. Baltimore currently does not have enough bike parking to successfully implement the requirement. No additional changes will be made.</p>
Standards for Parking and Operation	Email	<p>Bird supports implementing parking requirements that will include the ability for BCDOT to initiate parking picture checks for users who violate parking laws. Bird understands that vehicle clutter and inappropriate parking creates a pedestrian liability and a headache for the city.</p>	<p>Permit Holders shall require end of trip pictures from riders that show where and how the vehicle was parked. Permit Holders shall use the end of trip pictures to: (a) check end of trip pictures when a parking violation is reported by DOT; and (b) disable rider accounts when</p>

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		Our revolutionary AR Parking (AI-verified) uses a blend of GPS and on-vehicle data to verify when a rider is parked in an approved area. We work with each city to create parking zones that best suit the area and riders are unable to end their ride unless they are parked in a designated spot.	three or more end of trip pictures show unlawful parking or do not show the parking of the vehicle. No additional changes will be made.
Standards for Parking and Operation	Email	So are these going to be left abandoned all over the neighborhood? The regular scooters are left laying about on sidewalks and in the streets here in Brooklyn. I think they are a nuisance, don't bring them here.	<p>The rules and regulations are the annual revision to the existing program, this will not be a new program. This just adds additional rules, including more parking regulations, to the scooters like Lime, Link, and Spin which operate here.</p> <p>Individual scooters should be reported to the company (phone number is on every vehicle) but BCDOT can help to enforce rules if there are specific problem areas.</p>
Standards for Parking and Operation	DVC Meeting	Reporting parking problems in app	Riders can report parking issues using the customer service numbers shown in the mobile phone applications and listed on the Dockless Vehicles.
Standards for Parking and Operation	DVC Meeting	Data-based corral locations	BCDOT is working to add more parking corrals this spring and summer. Corral locations are identified by reviewing ridership trends. Corrals will be installed in areas of high ridership and with high concentrations of Dockless Vehicles. No additional changes will be made.
Standards for Parking and Operation	DVC Meeting	Temporary corral locations when busy	BCDOT is working to add more parking corrals this spring and summer. Corral locations are identified by reviewing ridership trends. Corrals will be installed in areas of high ridership and with high concentrations of Dockless Vehicles. No additional changes will be made.
Standards for Parking and Operation	DVC Meeting	Corral carrots and sticks	BCDOT is working to add more parking corrals this spring and summer. Corral locations are identified by reviewing ridership trends. Corrals will be installed in areas of high ridership and with high concentrations of Dockless Vehicles.

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Standards for Parking and Operation	DVC Meeting	City spot parking photo checks	<p>BCDOT is looking into increasing signage surrounding parking corrals and education about parking corrals. No additional changes will be made.</p> <p>Permit Holders shall require end of trip pictures from riders that show where and how the vehicle was parked. Permit Holders shall use the end of trip pictures to: (a) check end of trip pictures when a parking violation is reported by DOT; and (b) disable rider accounts when three or more end of trip pictures show unlawful parking or do not show the parking of the vehicle. No additional changes will be made.</p>
Standards for Data and Reporting	Email	<p>Bird has already implemented MDS 1.0 and is ready to support the use of it in Baltimore. Bird is committed to sharing the data that cities need and we typically provide detailed information about our operations in the format that best suits the city every night. Additionally, our operations team compiles a comprehensive list of variables surrounding ridership, rebalancing operations, e-scooter and e-bike maintenance, reported incidents, accessibility compliance, outreach and environmental impact. We have seen first-hand how our data can help guide local infrastructure improvements and are committed to providing the details each city needs.</p> <p>Providing accurate and timely data on vehicles that are not being used or are suspected of being vandalized is important to fleet management. Bird is easily able to capture this information by changing the status of the vehicle to 'Unknown' within our system if it is suspected to be vandalized or missing for five or more days.</p>	No additional changes will be made.