

Shared Electric Scooters Permit Application



I. Shared Electric Scooter Pilot Period

The Portland Bureau of Transportation (PBOT) is planning a one-year pilot for the regulation of Shared Electric Scooters (herein referred to as “Shared Scooters”) beginning in the spring of 2019 and ending spring of 2020 (“the Pilot Period”). The Pilot Period will help the City determine whether Shared Scooters can support the City’s policy goals to: reduce private motor vehicle use and congestion; prevent fatalities and injuries on the transportation system; improve pedestrian safety, accessibility, and convenience for people of all ages and abilities; provide equitable transportation services; and reduce air pollution, including climate pollution. Through public engagement and program evaluation, City officials will determine whether and under what circumstances Shared Scooters will be permitted to continue operating in the public Right-of-Way after the Pilot Period.

The operation of a Shared Scooter is a privilege, not a right, and requires a valid, current Shared Scooter permit issued by the City. Currently, the City only intends to provide permits to companies for the Pilot Period. Therefore, the City will only be providing permits valid from April 26, 2019 to April 26, 2020. Following the Pilot Period, the Bureau of Transportation may update this permit. Companies must certify to the City of Portland that all Shared Scooters have met all applicable certifications and operating requirements.

For the duration of the Pilot Period, the Director of PBOT may issue multiple, independent permits for an initial allotment of 250-1,250 Shared Scooters per Permittee. The Director will determine the number of permitted scooters per Permittee. Permittees must: coordinate with the City regarding their launch schedule; deploy Shared Scooters within two-weeks of permit issuance; make available a maximum of 50 percent of their Allotted Shared Scooters for the first week of deployment; and deploy a minimum of 15 percent of the Permittee’s available fleet each day in the historically underserved East Neighborhoods as defined by the City of Portland’s 2035 Comprehensive Plan.

A failure to comply with the applicable City Code provisions, State provisions, Federal provisions, TRN 15.01 Shared Electric Scooter Administrative Rule, and all permit conditions is subject to an assessment of enforcement penalties and suspension or revocation of the company’s permit by the Director of PBOT or designee. Penalties will be applied per violation and per day a company is in violation of City Code and this Rule.

Applicants should read through this document and its appendix carefully, as they outline all permit requirements. Applications will not be reviewed and processed until all application requirements are fulfilled, including payment of the application fee.

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II. Permit Application Instructions

A. Application Submission and Deadline

Applications must either be emailed to e-scooter@portlandoregon.gov, or mailed to:

Portland Bureau of Transportation
Regulatory Division
ATTN: Tim Moore
1120 SW 5th Avenue, Suite 800
Portland, OR 97204

Permit Applications must be received by **11:59 p.m. (PST) April 9, 2019** and submitted in a single PDF (*partial packages will NOT be accepted*). The City will make every effort to confirm receipt of an Applicant's Application within two business days of application submission.

B. Fee Schedule

Permit Application Fee	\$500.00	(non-refundable)
Per Scooter Pilot Permit Fee	\$80.00	(non-refundable, prorated at \$20.00 per quarter)
Street Use Surcharge	\$0.25	(invoiced monthly after commencement of operation)
Right-of-Way Use Surcharge		
Central City Pattern Area	\$0.20	(invoiced monthly after commencement of operation)
West Neighborhoods, Inner Neighborhoods, River & Industrial Pattern Area	\$0.10	(invoiced monthly after commencement of operation)
East Neighborhoods Pattern Area	\$0.05	(invoiced monthly after commencement of operation)

C. Fee and Surcharge Payment

The Permit Application Fee is due at time of application submission and is non-refundable. The Pilot Permit Fee is due at the time of permit issuance and is non-refundable. If a Permittee's allotment increases, the Pilot Permit Fee is due at the time of permit issuance for the quarter in which the Allotment is granted and is not refundable. The Per-Trip Surcharge and Right-of-Way Use Surcharge must be paid within a month of the invoice date after commencement of operation.

Permittees shall add a \$0.25 Street Use Surcharge to the User's total fare of each completed trip, as enumerated by TRN-15.01.

Failure to fully and accurately pay fees and surcharges may result in permit revocation. Payment can be made by check, Visa, MasterCard or American Express.

D. Applicant Finalists

In addition to meeting the permit requirements, Applications will be evaluated based on the criteria in

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Appendix F. Applicant finalists will be informed on April 18, 2019 and will be required to demonstrate their scooter is in compliance with TRN 15.01 prior to receiving a permit.

E. Questions

Questions can be directed to e-scooter@portlandoregon.gov or (503) 823-7483.

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III. Application Checklist

The checklist provided below should be used to ensure application completeness.

IV. Application Questions

- A. Company Overview
- B. Shared Electric Scooter Description
- C. Maintenance & Operations Plan
- D. Safety History Report
- E. Pricing & User Equity Plan
- F. Economic Opportunity Plan
- G. Communication & Outreach Plan
- H. User Compliance Plan
- I. Life Cycle Assessment Report or Reporting Plan
- J. Vehicle Miles Traveled Reporting Plan
- K. Data Breach History Report
- L. Privacy Policy
- M. Data Sharing Agreement

V. Required Documentation

- A. City of Portland Business License
- B. Copy of Secretary of State Registration
- C. Proof of Insurance, including additionally insured documentation
- D. Certificate of PCI Compliance
- E. Shared Electric Scooter Company Permit Application

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- VI. **Appendix**
 - A. Permit Application
 - B. Shared Scooter Unique Identification Master List Template
 - C. Data Sharing Agreement
 - D. Pattern Areas Map
 - E. High Crash Corridors Map
 - F. Permit Application Evaluation Criteria
 - G. Review Schedule & Incentives
 - H. Sidewalk Corridor

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IV. Application Questions

- A. Company Overview. Provide an overview of your company, along with:
- a) Every North American city that you currently operate, a local regulatory contact, and the number of scooters in each.
 - b) List all legal or regulatory enforcement actions, by type, initiated against the company
- B. Shared Electric Scooter Description.
- a) Provide a detailed description of your scooter model(s), including expected life cycle of:
 - i. Handlebars
 - ii. Deck
 - iii. Wheels
 - iv. Brakes
 - v. Lights
 - vi. Motor
 - vii. Battery
 - viii. Locking or fastening equipment
 - b) Provide proposed language, placement and font size for each of the required messaging:
 - i. Unique scooter identification number
 - ii. Permittee's customer service information
 - iii. Name of the Permittee
 - iv. Safety messaging on the vehicle, including notices stating:
 - a) Helmets are required
 - b) Age requirements
 - c) Sidewalk riding is illegal
 - d) It is illegal to ride or park in Portland parks, including Waterfront Park, Eastbank Esplanade, and Springwater Corridor
 - e) Scooters must be parked in a way that does not impede pedestrian or vehicle travel
 - f) Violations of applicable laws may result in fines and account suspension.
 - c) Provide image(s) of the branded scooter model(s) you propose for Portland
- C. Maintenance & Operations Plan
- a) Maintenance – describe:
 - i) The frequency and extent of your maintenance and cleaning of scooters
 - ii) The type of labor (employees, staffing services, contract labor, etc.) conducting maintenance
 - iii) The average lifespan of the main scooter parts and scooter disposal practice
 - iv) The extent of scooter maintenance
 - b) Operations – describe:

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- i) Proposed launch schedule – provide an estimate number of days from permit issuance to launch and provide an estimate of the number of days from launch to deployment of your full allotment.
- ii) Hours of operation – list typical Shared Electric Scooter deployment time, pick-up time, and typical hours Shared Electric Scooters are available to rent
- iii) Pricing plan, including discounted pricing plans offered
- iv) Storage of scooters during non-operational hours
- v) Proposed fleet size and service area at launch. Note that PBOT requires 15 percent of fleet to be deployed daily with the East Neighborhoods Pattern Area, as shown in the Appendix.
- vi) Methods and frequency of deploying, redistributing, and charging scooters. Specify if you utilize fleet vehicles, contractors' vehicles, electric vehicles, electric bicycles, swap batteries and/or any other methods. Approximately what percentage of deploying, redistributing, and charging scooters is completed via each method?
- vii) Process for receiving and resolving complaints and problems with scooters blocking the travel movement in real-time (e.g., sidewalk, travel lane, etc.). Include the customer intake process, and staffing levels. In what time frame are complaints acknowledged and resolved? (Communication strategies with users are listed later.)
- viii) Helmet distribution strategy
- ix) Inclement Weather Plan – describe weather conditions which would preclude the deployment of your equipment

b) Local Operator Contact Information

- i) Provide the name, email, phone of your local operator, available by phone 24 hours/7 days a week
- ii) List address(es) of Portland operations and any storage facilities

c) Customer Service Operations

- i) Provide location(s) of your customer service operations.
- ii) Provide your 24-hour customer service number.
- iii) Does your customer service number provide the ability for translation services? If yes, list the languages translation is available.
- iv) Does your customer service number receive SMS text messages?
- v) Provide the URL for your online report form for Users and non-Users / public to report parking issues, maintenance issues, and other issues.

D. Safety History Report. For each market that you operate, provide a summary report of safety incidents.

The summary must include:

- a) Total number of reported injuries, separated by: major injuries resulting in hospitalization, fatal injuries
 - i) For each fatal injury, provide details of the collision, including other parties involved (e.g. auto, e-scooter, pedestrian, bicycle)
- b) Total number of reported injuries resulting from device malfunction
- c) Total number of reported injuries that involved person(s) with a disability
- d) A summary of changes made by Applicant in response to safety incidents
- e) Provide average time taken to respond to customer service calls, and average time taken to resolve customer service complaints

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E. Pricing & User Equity Plan

- d) What strategies will you use to reduce barriers and increase access to Shared Scooters for historically underserved communities, including people with low-incomes, people of color, and people with disabilities? List any partnerships you have with Portland-based community-based organizations, cultural organizations, or nonprofits.
- e) What will your discounted pricing be for people living on low-incomes? What is the sign-up process for receiving discounted pricing?
- f) Attach documents or provide an URL to printed marketing materials you have for low-income pricing in every language provided.
- g) How will you provide access to people who do not have a smartphone?
- h) Describe any cash payment options, if you have them.
- i) List the languages your rental cell phone application is currently provided in.
- j) Are your cell phone application(s) and website(s) compliant with ADA standards and screen reader compatible?

F. Economic Opportunity Plan

- a) How will you create jobs for people living on low-income and traditionally underserved, including people of color, low-income people, immigrants and refugees, veterans, people with disabilities, women, and formerly incarcerated people?
- b) List any workforce development corporations in Portland you have a partnership with.
- c) How will you contribute to enhancing the economic and civic vitality of Portland?

G. Communication & Outreach Plan

- a) User Education: Describe your plan to educate and encourage user compliance with all applicable laws, including minimum age, helmet requirements, prohibition on riding in Portland parks, prohibition of sidewalk riding, and user notifications, warnings, fines and account suspension. To reduce barriers to access, PBOT discourages Permittees from requiring driver's license verification.
 - i) Provide proposed language to educate Users on the safe operation of a Shared Scooter. Include screenshots of education provided at the time of User registration, at the time of activation of rental, and at any other points.
 - ii) Provide proposed language and format of interactive safety messaging, such as quizzes, in your application. What frequency will you deliver interactive messaging to Users?
- b) General Public Communication: Describe your plan to communicate to the public on system use, driving safely around scooters, and how to report complaints. List the languages your communications are provided in.

H. User Compliance Plan

- a) How will you ensure that Users comply with all applicable laws? Describe the process by which you distribute notifications, warnings, fines and suspend Users' accounts for documented occurrences of non-compliant behavior.

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- b) How do you propose reporting to PBOT regarding notifications, warnings, fines and suspensions delivered to Users?

- I. Life Cycle Assessment Report or Reporting Plan
 - a) Are you providing a Life Cycle Assessment as part of your application?
 - b) If not, describe your plan to acquire a Life Cycle Assessment within six months of receiving a permit.

- J. Vehicle Miles Traveled Reporting Plan
 - a) How do you propose to report on energy consumed and operational vehicle miles traveled (VMT), including but not limited to scooter deployment, rebalancing, and charging?

- K. Privacy Policy
 - a) Provide a copy of your privacy policy, and describe how you safeguard Users' information, including personal, financial, and travel information.
 - b) List all of the parts of a User's mobile phone (e.g., camera, location services, contacts) that are required by Applicant for access to its service. Why are they required? Does the company use this data for other commercial purposes beyond the Shared Scooter service?
 - c) List additional elements a User's mobile phone that are requested during the registration process or subsequently. Why are they requested? Does the company use this data for other commercial purposes beyond the Shared Scooter service?

- L. Data Breach History Report
 - a) Provide a summary report describing the date, location, and type of data accessed for all data breaches.

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V. Required Documentation

- A. **Permit Application** – Appendix
- B. **City of Portland Business License Certificate of Compliance** – May be obtained from the Portland Revenue Bureau (<https://www.portlandoregon.gov/revenue/59484>)
- C. **Secretary of State Registration** – Companies must be registered with the Oregon Secretary of State (<https://sos.oregon.gov/business/pages/register.aspx>)
- D. **Proof of Insurance, including additionally insured documentation**
- E. **Certificate of Payment Card Industry (PCI) Compliance**

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APPENDIX A – SHARED ELECTRIC SCOOTER PERMIT APPLICATION

THE PORTLAND BUREAU OF TRANSPORTATION (PBOT) WILL ADMINISTER AN ONE-YEAR PILOT FOR THE REGULATION OF SHARED ELECTRIC SCOOTERS (“SHARED SCOOTERS”) BEGINNING IN THE SPRING OF 2019 (“THE PILOT PERIOD”). THE PILOT PERIOD WILL HELP THE CITY DETERMINE WHETHER SHARED SCOOTERS CAN SUPPORT THE CITY’S POLICY GOALS. THE CITY ONLY INTENDS TO PROVIDE PERMITS TO COMPANIES FOR THE PILOT PERIOD. COMPANIES MUST SECURE A PERMIT FROM PBOT TO OFFER SHARED SCOOTERS FOR COMMERCIAL PURPOSES IN PORTLAND. THE OPERATION OF A SHARED SCOOTER IS A PRIVILEGE, NOT A RIGHT.

COMPANY INFORMATION

COMPANY NAME	
BUSINESS ADDRESS	MAILING ADDRESS (IF DIFFERENT THAN BUSINESS ADDRESS)
CITY, STATE, ZIP CODE	CITY, STATE, ZIP CODE
PORTLAND BUSINESS LICENSE NUMBER	ODOT ACCOUNT NUMBER
PRIMARY CONTACT NAME	TITLE
PHONE NUMBER	EMAIL ADDRESS @
ALTERNATE CONTACT NAME	TITLE
PHONE NUMBER	EMAIL ADDRESS @
GENERAL CONTACT PHONE NUMBER	GENERAL FAX NUMBER
GENERAL CONTACT EMAIL ADDRESS	@

CONTACT INFORMATION

APPLICATION MATERIALS

CITY OF PORTLAND BUSINESS LICENSE	ISSUE DATE	SECRETARY OF STATE REGISTRATION	EXPIRATION DATE	PROOF OF INSURANCE	EXPIRATION DATE	CERTIFICATE OF PCI COMPLIANCE	INITIAL
DATA SHARING AGREEMENT	INITIAL	PAID APPLICATION FEE	INITIAL	MAINTENANCE & OPERATIONS PLAN	INITIAL	COMMUNICATIONS & OUTREACH PLAN	INITIAL
PRIVACY POLICY	INITIAL	PRICING & USER EQUITY PLAN	INITIAL	ECONOMIC OPPORTUNITY PLAN	INITIAL	SAFETY HISTORY REPORT	INITIAL
DATA BREACH HISTORY REPORT	INITIAL	SHARED ELECTRIC SCOOTER DESCRIPTION	INITIAL	LIFE CYCLE ASSESSMENT REPORT OR REPORTING PLAN	INITIAL	VEHICLE MILES TRAVELED REPORTING PLAN	INITIAL
COMPANY OVERVIEW	INITIAL	AGREE TO PARTICIPATE IN EVALUATION	INITIAL	LOCAL AGENT CONTACT INFORMATION	INITIAL	NUMBER OF SHARED SCOOTERS REQUESTED	NUMBER

I CERTIFY, BY SIGNING BELOW, EACH CRITERION OUTLINED IN TRN 15.01 HAS BEEN MET AND WILL BE CORRECT AND ACCURATE UPON AN AUDIT CONDUCTED BY THE PORTLAND BUREAU OF TRANSPORTATION. THE APPLICANT AGREES TO PARTICIPATE IN THE EVALUATION OF THE PILOT PERIOD BY DISTRIBUTING A CITY SURVEY TO ITS USERS. FAILURE TO COMPLY WITH CITY CODE, TRN 15.01, AND PERMIT CONDITIONS MAY RESULT IN ONE OR MORE OF THE FOLLOWING: CIVIL PENALTY, VEHICLE IMPOUND, SUSPENSION OR REVOCATION OF THE SHARED ELECTRIC SCOOTER COMPANY PERMIT. I FURTHER AGREE TO INDEMNIFY, DEFEND, AND HOLD THE CITY OF PORTLAND AND ITS ELECTED OFFICIALS, OFFICERS, EMPLOYEES, AND AGENTS HARMLESS FROM AND AGAINST ALL CLAIMS ARISING FROM, IN WHOLE OR IN PART, THE APPLICANT’S OPERATIONS UNDER THIS PERMIT.

FURTHERMORE, I ACKNOWLEDGE, BY SIGNING BELOW, THE AUTHORITY OF THE CITY OF PORTLAND TO REGULATE AND MANAGE ITS RIGHT OF WAY, INCLUDING THE OPERATION OF THE APPLICANT’S BUSINESS. THE APPLICANT AGREES AND ACKNOWLEDGES THAT LOCAL CONTROL OF THE RIGHT OF WAY IS ESSENTIAL FOR THE CITY TO ENSURE PUBLIC SAFETY AND THUS, AN IMPORTANT GOVERNMENT FUNCTION.

SIGNATURES

PLEASE PRINT NAME	SIGNATURE
TITLE OF SIGNOR	DATE

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PBOT USE	DATE STAMP DOCUMENTS RECEIVED	DOCUMENTS RECEIVED BY	APPLICATION FULFILLS MATERIAL REQUIREMENTS (INITIAL, DATE)	
			PERMIT DENIED	ISSUED PERMIT DATE
			PERMIT APPROVED	
	NUMBER OF APPROVED SHARED SCOOTERS	FULL DEPLOYMENT DATE		

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APPENDIX C - Data Sharing Agreement

- a) At time of application submission, Applicants must agree to provide the City or a City-identified third-party researcher, access to data in accordance with the requirements specified in the City's mobility data specification published at <https://github.com/CityofPortland/mobility-data-specification>.
 - b) At time of application submission, Applicants must provide the City with a publicly-available API consistent with GBFS standards. Provide a link to your GBFS API:
-

In addition, all Applicants must agree to distribute, in a manner consistent with PBOT criteria:

- c) User survey(s), developed by the City and distributed by the Permittee during the Pilot Period.
- d) Employee and contractor survey(s), developed by the City and distributed by the Permittee during the Pilot Period.

If the City receives a request for any confidential information pursuant to a Public Record request pursuant to ORS Chapter 192, or any other applicable law or is sued in order to obtain the disclosure of such information, the City shall promptly notify Permittee upon receipt of such request or lawsuit so as to afford Permittee the opportunity to take steps to prevent disclosure. In the event the City is ordered by a court of competent jurisdiction that a portion or all of the confidential information is not required to be kept confidential or does not constitute trade secrets or confidential information exempt from disclosure, or disclosure is otherwise required by law, the City shall provide Permittee prompt notice before complying with the court order or law, so that Permittee may take appropriate actions, including seeking an injunction, appeal and stay of the court order or otherwise challenge the law.

- Do you agree to provide data in accordance with the requirements specified in the City's mobility data specification?
 Yes
 No
- Do you agree to provide the City monthly reports on chargers, users, and complaints as specified in TRN 15.01?
 Yes
 No
- Do you agree to distribute City-developed user survey(s)?
 Yes
 No
- Do you agree to distribute City-developed employee and contractor survey(s)?
 Yes
 No

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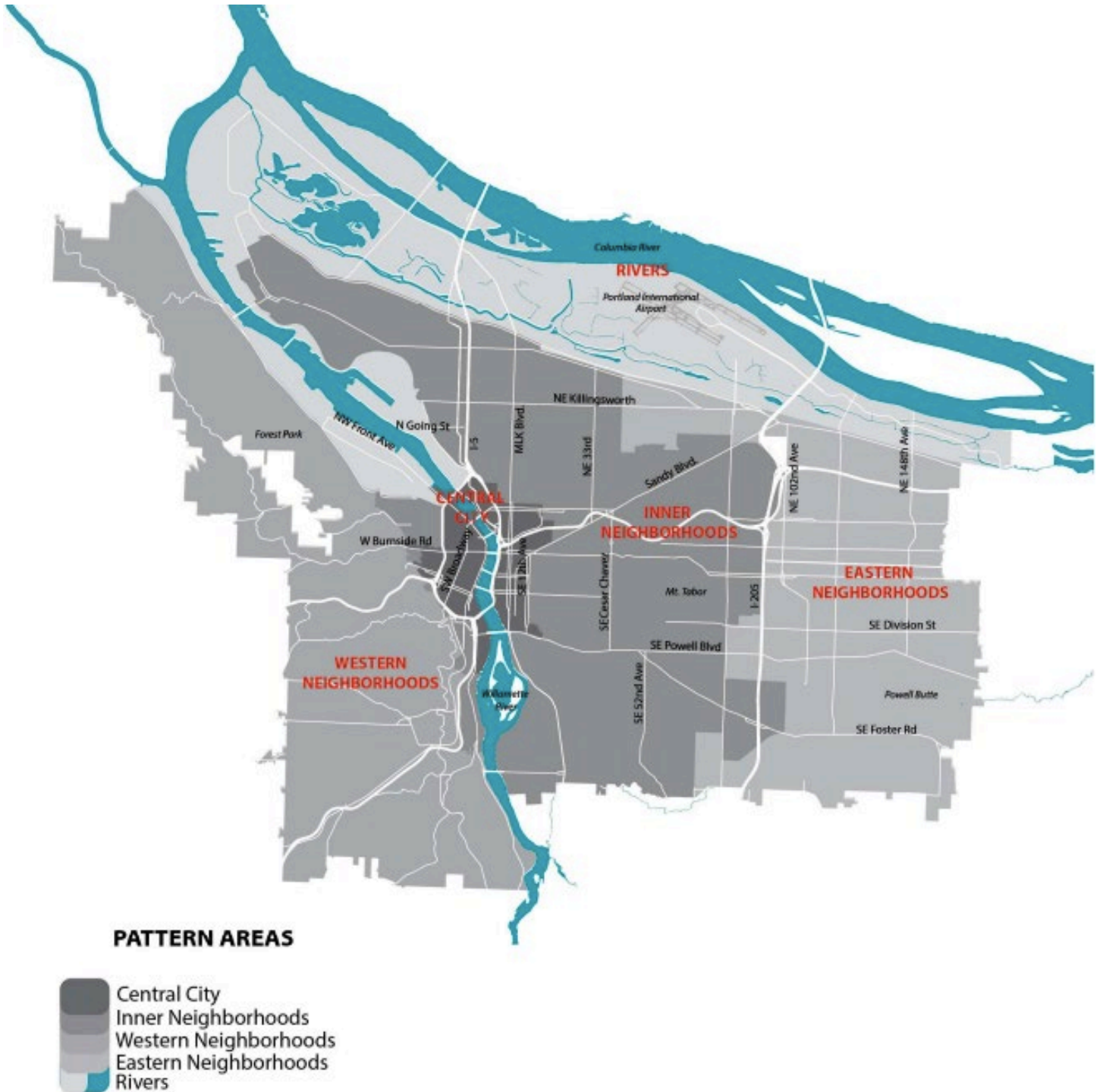
- Do you agree to report operational Vehicle Miles Traveled data to a City-identified research partner or contractor?
 - Yes
 - No

- Do you agree to provide additional data to a City-identified research partner or contractor for the purposes of program evaluation?
 - Yes
 - No

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Appendix D – Pattern Areas Map

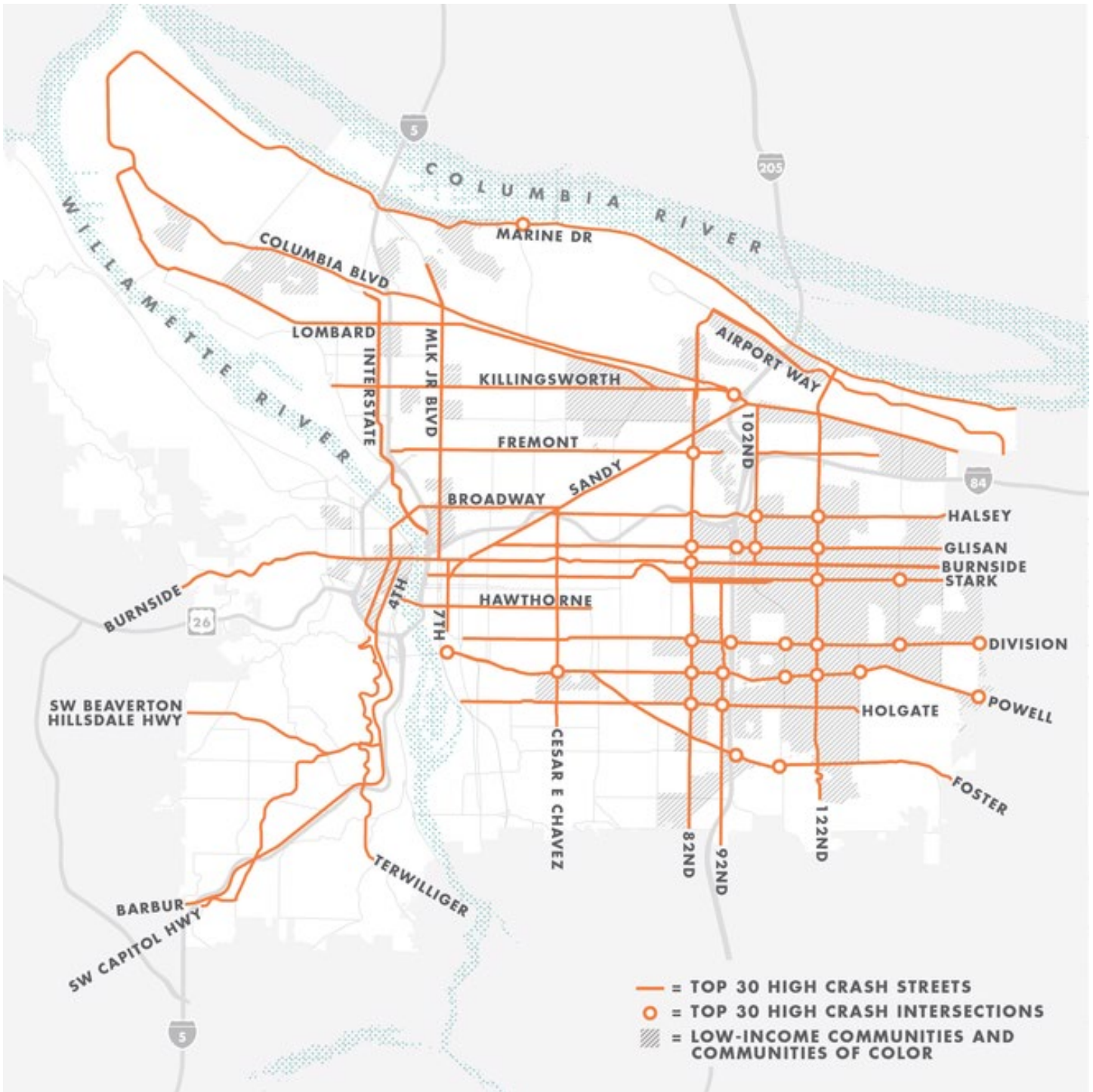


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Appendix E – High Crash Corridor Map

Link to online version: <https://pdx.maps.arcgis.com/apps/MapSeries/index.html>



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Appendix F – Permit Application Evaluation Criteria

In addition to ensuring Applicants meet the permit requirements, PBOT may use the below criteria to evaluate Applicants and select Applicant finalists.

GOAL(S) SUPPORTED	OBJECTIVE(S) SUPPORTED	EVALUATION CRITERIA	SCORE AWARDED 0 = No response 1 (Poor) - 5 (Excellent)
SAFETY	Support safe riding and safe walking conditions	A plan to reduce improper parking and riding, including in-app education beyond requirements, street teams, and enforcement by the company	
		Demonstrates technology that detects and eliminates sidewalk riding and improper parking	
		Fully accessible app including TTY options for reporting issues	
EQUITY	Reduce barriers and increase access to Shared Scooters by people with low incomes, people of color, and people with disabilities	Seated scooters as part or all of their fleet (1 point for <25%; 2 points for 25%; 3 points for 50%; 4 points for 75%; 5 points for 100%)	
		No requirement for a driver's license to create an account, or allows users to verify age by using alternate forms of identification, such as a state-issued ID, passport, or passport card	
		App available for each of Portland's 10 Safe Harbor languages (1 point per 2 languages offered)	
		Evaluation of plan to provide an equitable e-scooter service, including education, marketing, and engagement with low-income, communities of color, non-English speaking, people with disabilities	

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REDUCE MOTOR VEHICLE USE; REDUCE AIR POLLUTION		Demonstrate economic opportunity plan with established agreements with workforce and CBO hiring partners. Commitment to hiring a percentage of workforce who are people of color, low-income, women, LGBTQA, people with disabilities.	
	Increase the number of trips shifted from automobiles; Reduce barriers and increase access to Shared Scooters	Create parent/guardian waiver for riders 16-17 years old. (Aligns company rules with ORS minimum age requirements).	
	Understand permittees' scooter life cycle climate impacts	Evaluation of lifecycle assessment report, if provided, that details how the Applicant is minimizing environmental impacts in their operations and supply chain. If no Life Cycle Assessment provided, evaluation of plan to provide one.	
OVERALL	Meet objectives of pilot, commitment to collaboration and city partnerships	Applicant demonstrates innovative and/or effective strategies that address the main objectives of the pilot.	
		Applicant 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.	
		Applicant's demonstrated customer service and issue response process.	

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Appendix G - Review Schedule & Incentives

PBOT will monitor, evaluate and recommend changes to a Permittee’s Allotment during the following review periods:

Review period	Review Period Dates	Allotment determination
1	April 26 - June 30	7/15/19
2	July 1 - September 30	10/15/19
3	October 1 - December 31	1/15/20

Incentives may be distributed based on a Permittee’s performance during the review periods. Eligible Applicants may obtain incentive fleet increases in multiple review periods. After receiving an incentive for demonstrated performance, PBOT expects companies to maintain performance in subsequent review periods. Performance metrics may include:

SAFETY	A Permittee who implements innovative technology or business practices that eliminate sidewalk riding may be eligible for an up to 20% allotment increase.
	A Permittee who implements innovative technology or business practices that eliminate improper parking may be eligible for an up to 20% allotment increase.
	A Permittee who organizes free safety workshops in partnership with a local nonprofit organization during the review period may be eligible for a 2.5% allotment increase per 10 documented event participants, up to a total of 15%.
UTILIZATION	A Permittee who meets or exceeds an average of 3-4 trips per scooter per day outside of East Portland may be eligible for an up to 35% allotment increase.
EQUITY	A Permittee who meets or exceeds an average of 2-3 trips per scooter per day in East Portland may be eligible for an up to 35% allotment increase.
REDUCE VMT	A Permittee who works with a third-party researcher or consultant to provide an analysis and verifiably demonstrates a reduction in operational vehicle miles traveled and climate impacts during the third review period may be eligible for an up to 35% allotment

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GOOD PARTNER

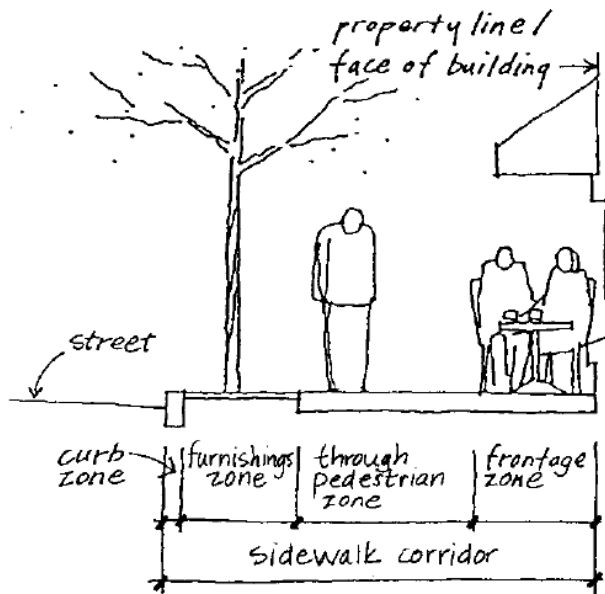
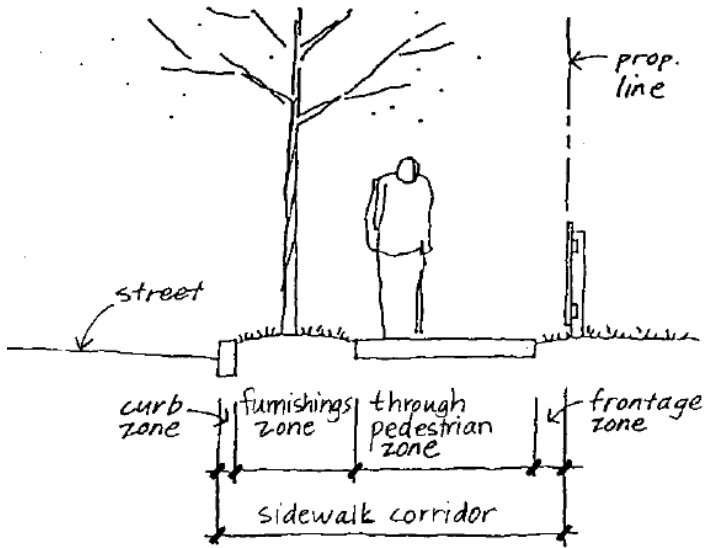
increase. The allotment increase may be determined by the relative amount of the permittee's per scooter operational VMT to the aggregate per scooter VMT from all permittees submitting reports.

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.

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Appendix H – Sidewalk Corridor



Typical sections of Sidewalk Corridor in residential zone, top, and commercial zone, bottom sketch.