

# Compliance with FTA Requirements in Transit/Shared Mobility Partnerships

Transcript

*October 23, 2019*

**Speaker:**

Let me do this again. Can people now hear me speaking? I'm hearing yeses. That's fantastic. The wonders of technology. Thanks for your patience as we get started. We appreciate everyone for that.

So, it looks like we have a pretty consistent message now that audio can be heard. I would note again, forgive me for mundane detail. Our audio is presented over voice over IP. That means you need to have your computer speakers on, and turned up in order to be able to hear our speakers this afternoon. One thing you might do to make sure that you have better sound quality is in the audio menu of the webinar room on the upper left section of the screen, there is a wizard to utilize to make sure your settings are correct to enable you to hear us as well as you possibly can. So, given that note, I will, barring any particular issues, it looks like for the most part we're okay. I will go ahead and get started. So, thank you everyone, and welcome very much to the second of two webinars that we are hosting this month in our efforts to promote learning in our industry around partnerships between. We've learned a great deal about what agencies have been doing around the country and especially those partnered with us on the Mobility on Demand program. We are very glad to see two of the lessons of that work have spread outside the Sandbox to other agencies. We have an opportunity today to learn in conversation with a couple of our colleagues who are both inside and outside of the Sandbox as well as from staff within FTA who have some useful knowledge to share. This kind of knowledge is really vital to FTA's goal to support the field in its efforts to innovate in the ways in which we serve the traveling public and do so in a way that benefits everyone. So that as this mobility landscape that we're experiencing involving continues to grow and change, it does that in a way that helps us achieve our goals of complete trips for all. So, in today's session in particular, we're going to highlight practices that help to ensure compliance with FTA's rules and other requirements, particularly as they relate to the Americans with Disabilities Act, Title VI of the Civil Rights Act, and drug and alcohol testing requirements and how those are impacted around partnerships between public transportation providers and shared mobility companies. So, to help us to learn in that direction, we're going with a group of excellent experts. We have first among that group today is Bonnie Graves from FTA's Office of the Chief Counsel, she was instrumental in crafting the frequently asked questions documents that are available at FTA's website, from which she will refer in much of her presentation today and will provide excellent background in how many of these rules are applying in this new mobility space. Then I'm going to ask my colleague, Brian, if he wouldn't mind reading a bit more of the biographical information of people on the ground helping to lead us in this new direction. Brian, can you introduce Penny and John?

**Brian Jackson:**

Sure. Penny Grellier is the Business Partnership Administrator for Pierce Transit headquartered in Washington. Been with the agency four years. Coordinates outreach promoting agency services and projects, facilitates partnerships to support transit, transportation and shared use mobility options, and develops new approaches to innovative service, prior to joining, 15 years managing regional transportation program for low-income special needs population and the nonprofit sector. She lived in Tacoma over 20 years and enjoys outdoor and community-based activities. John Andoh is the Director and Chief Executive Officer COMET. He has a strong passion for public transit and has been working in public transit since the age of 13, beginning as an intern at Valley Transportation in San Jose. He became a transit manager at the transit authority working for the Board of Directors and implementing inner city transit service. Before coming to the COMET, he was County Public Transit at -- in New York and in Texas. Overseeing 445 bus routes...3 contractors. Been the leader at COMET...2018.

**Speaker:**

Excellent. Thank you for that, Brian. Before I move further, I'm seeing comments over the chat that there is some troubles yet with the audio. There is a chance that this might be connection based with individual computers, but in the possibility that there might be other static, I'm wondering if anybody who is currently not speaking would be good enough to mute their phones. Let's see if we can't cut back on some of the static that might be coming across the line. So, we'll see if that improves. So, thank you, again, very much for that, and again, forgive us, for minor difficulties. We have practitioners with excellent experience in the trenches, they've learned a great deal that we think can be a great value to others who are considering these kind of partnerships or working to make sure their efforts in general to innovative, keep in mind the larger goals we have, and we at FTA have, to ensure that we benefit everyone and ensure compliance. Following the presentation part of this, we're going to allow for questions. That gives me a bit of an interlude into more housekeeping, as I said, for those of you who are still trying to figure out the audio situation today, we are coming to you through voice over IP. If you can't hear us, try turning your computer speakers up or adjusting your headphones. There's also, if you go to the audio menu, at the webinar screen, there is an audio wizard of some kind, I believe it might say audio conference, but under audio, there should be a very obvious, for participants, forgive me, there should be a fairly obvious opportunity there to check the settings that are being used, and make sure that the sound is coming out of the appropriate output. Also, to kick us off and begin.

**Bonnie Graves:**

Thanks, Rick. Welcome, everyone, thank you so much for calling into this webinar today. We're going to talk about mobility and TNCs, I'm going to be talking the legal -- when entering into TNCs, typically we see TNCs wanting to partner with transit agencies; legal issues include eligibility for FTA funds, when can web page. So I have included the address at the top of the screen if you want to take a minute to write that down. If you don't have the opportunity to do that, if you go to the home page, and then type in Shared Mobility in the search box, it will take you straight to the shared mobility

screen. So, everything I'm going to discuss is available in more detail on our shared mobility web page. There you'll find answers to frequently asked questions, shared mobility definitions, information about the shared use mobility center, and the DOT's colleague letter related to equity and access to shared mobility issued by former secretary Fox. So the types of service that we typically see with public transit and TNCs is first mile last mile service, in particular to rail stations. Replacing route service when demand is low, for example, late night service, so they're doing demand response instead of fixed routes. Supplementing Americans with Disabilities Act paratransit service, the provision of new demand response service, and as well as non-service partnerships such as linking to TNC app and doing joint marketing. [No audio]. Rik, the page didn't come up. We seem to be having more technical difficulty. Rik or Brian?

**Speaker:**

Hi, Rik is here. Sorry, it seems like we had a little bit of a --

**Bonnie Graves:**

I can no longer see the slides. If you can see them, I can do them by paper.

**Speaker:**

All right. Let's go old school, shall we? It should be eligibility for FTA funds, slide 5. There we are, carry on.

**Bonnie Graves:**

I can't see them; I will have to tell you slide when I need you to move them.

**Speaker:**

No worry.

**Bonnie Graves:**

Of shared ride service. The definition of public transportation or part of it. Shared ride service open to the general public or a segment of the public defined by age disability or low income. Not every ride must be shared ride. But the service generally must be considered shared ride. And we define that in our guidance as if the driver or the first passenger can decline to pick up another unrelated passenger, then it's exclusive ride service. So, to be public transportation, it must be shared ride service. Since most TNCs are exclusive ride service they're not eligible for FTA funds. And if they're not -- but if they're not shared rides they may be eligible for programs that allow alternatives to public transportation, for example the section for seniors and individuals disabilities program, or for job access and reverse commute projects. Next slide, civil rights. So, the two civil rights issues that arise typically with TNCs are -- Americans with Disabilities Act, and Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color and national origin. There are two types, disparate impact, neutral policy that results in unintentional -- and treatment --...fortunately, we don't see a lot of... The next slide, the basic principles under the ADA, the ADA applies to -- federal funding, it doesn't matter if participating in the project or not, the ADA will apply. The DOT ADA regulations apply to both public and private entities, although the rules are

somewhat different for private entities. The service must be provided in the most integrated setting. And there is a use provision that says if a private entity is entering into a contract or other relationship with a public entity then they are subject to the public entity provision. Next slide. On fixed route service, all vehicles must be accessible to and usable by individuals with disabilities, including wheelchair users, and there are no exceptions to this rule. All fixed route vehicles must be accessible to people with disabilities including people who use wheelchairs. The interaction between the passenger and service does not make otherwise fixed services -- for example, if you can stand on the corner and flag the bus down, that does not make it demand response, it is still a fixed route service if it is traveling along a fixed route. Demand responsive service, grantees can acquire inaccessible vehicles for demand responsive service when the system as viewed in its entirety provides a level of service to people with disabilities including wheelchair users equivalent to service providers individuals without disabilities. And there are several equivalent service standards. And the reason there's a difference, demand response for this -- served ever serves as a broader area, it's a different interaction...person and the bus. So the equivalent service standard included response time, fares, the geographic area of service must be equivalent, hours and days of service, restrictions or priorities based on trip purpose, availability of information and reservation capability, and anything -- capacity or service availability. If there are restraints, for example, on the number of people that can be served applied to both the people with disabilities and people without disabilities, service needs to be equivalent with people with disabilities...next slide, TNCs demand response, when -- most TNC service is demand response service, when partnering with a TNC, the public transit agency has the obligation to meet the equivalent service standard, this is because you're contracting with a private entity but the public entity rules apply. So that equivalent service standard can be met by a number of different ways. It can be met by the TNC operator, most TNC operators do not have accessible vehicles, but if they do, then certainly the TNC operator can be the entity that provides the accessible vehicles. It can be provided by another operator; for example, a lot of taxi companies especially in larger cities have accessible vehicles, and the taxi companies can be contracted with to provide the accessible service to meet the equivalent service requirement. You can also use transit agency assets, for example, cut weighs that are used for your -- transit service, and you might need those in order to provide the equivalent service for demand response service. Next slide. Talking about ADA paratransit. FTA permits as long as vehicles are dispatched for those who need them. A lot know this because they do contract with taxi service overflows for with --...all of the paratransit ... applies, origin, destination, if necessary, the driver may have to -- the vehicle to walk the person to the door. The service area, three quarters of a mile on each side of the fixed route service. Response time, next day service. Fares can't exceed twice the fixed route fare. No restrictions on trip purpose, and hours and days of service are the same as the fixed route, and no capacity constraints. If you're using TNCs to supplement your ADA paratransit service, all the same ADA pro transit requirements apply. The next slide talks a little bit about -- a lot of transit agencies have been using partnerships...costs, some of the disability ... TNCs, because TNCs aren't on demand real-time service, they may offer better service as an incentive, but only for ambulatory people with disabilities, which then have the tendency to make next day paratransit a second class service for

wheelchair users. To the extent possible, if supplementing your ADA -- you definitely want to find a way to use accessible vehicles if possible ... so you don't have that issue. Next, to Title VI, TNC services have a tendency to rely on smartphones and credit cards, which can be a barrier for low income and limited English proficient individuals. Low income is not a protected class, but minority populations are disproportionately low income. So we keep -- we take a look at making sure that we're not accidentally or unintentionally discriminating. You want to consider your ... from linking the app and consider Title VI implications when establishing locations of pilot programs. So, for pilot programs, it is a good idea to make sure a neutral policy such as offering first and last mile service to one or two rail stations, doesn't have the effect of -- discriminating on the basis of race, color, or national origin. Where possible select diverse area if not offered system-wide. You may select a neutral policy of -- rail stations, the parking lots fill up at 6:30 in the morning, you want to try the first and last mile service, that's a neutral policy, if it happens to be those are your affluent non-minority neighborhoods you may end up with an unintentional Title VI problem, you want to take a look at your private program and where you're setting that up and make sure that your neutral policies doesn't result in unintentional discrimination. Next, drug and alcohol rules. Apply to recipients of the urbanized area program, Section 5307, capital investment -- Section 5309 and rural area programs Section 5311, as well as the contractors and subcontractors. The TNC is likely to be a contractor providing the safety sensitive function, operating a revenue vehicle, even if they're not providing public transportation as a shared ride service. Private operators are not exempt from the drug and alcohol rules, but the taxicab exception may apply to TNCs. So the taxicab exception is when a public transit passenger randomly -- from among a number of taxicab companies providing service, then the drug and alcohol testing regulations do not apply. This is because FTA recognizes the practical difficulty of trying to administer a drug and alcohol testing program in connection with multiple companies and upwards of hundreds and thousands of drivers. For example -- guaranteed ride home programs, been around quite some time, the transit agency contacts with multiple to find as or more taxicab companies and the passenger -- taxicab company to contact to get a ride home. In that situation, because the passenger makes the call, the taxicab exception would apply and drug and alcohol rules would not apply to those drivers. So the taxicab exception does not apply when a passenger does not choose a taxi company providing the service. For example, a lot of operators do use taxis as overflow for their ADA service. In those situations, when the ADA paratransit provider contacts the taxi company to schedule the trip, the drug and alcohol rules do apply to the company providing the service. Similarly, if the public transit agency provides vouchers to passengers to use for one taxicab company, the passenger does not have a choice of which company to contact. So far the drug and alcohol rules do apply. So, when applying the taxicab exception to TNCs, when a public transit agency has a contract or other arrangement with two or more TNCs, or taxi companies, provide service, and the public transit passenger chooses among the providers, accept and applies, and drug and alcohol testing is not required. A transit agency may contact two or more TNCs, plus their taxi company to ensure access to all customers. And even if the taxi company is the only entity that has accessible vehicles, or scheduled trip -- and accept cash, meaning that some passengers only have one choice, because most passengers have more than one choice we have

determined that the taxicab exception applies, and the drug and alcohol would not apply in that situation. Slide 18, application of taxi cap -- TNCs, drug and alcohol rules do not apply to section...research funds, even if the recipient also receives urbanized area capital investment or rural area funds. And so, that's -- the MODs -- drug and alcohol do not apply to MOD research projects. Drug and alcohol do apply to pilot programs that don't FTA funds. If the transit agency is -- pilot for them, and they're not following the taxicab exception, so you can always -- two or more is all you need, and that can be a TNC and a taxi company, that's two or more, and as long as the passengers can -- not just people with disabilities, or people who need -- use a phone, anybody can use a taxi company or the TNC, that's two or more. Then the drug and alcohol rules do not apply. So, the last slide is just information on a report that was published last year on legal issues related to TNCs and public transit. The report includes a description of ride sourcing services in the United States, it includes state and municipal statutes and regulatory issues, includes procurement, and processes, contracts and partnership provisions and agreements between transit agencies, and ride sourcing providers, or TNCs, issues of compliance with federal law and civil rights, legal plans and litigation, and risk management -- stemming from relationships between TNCs and transit agencies. So, if you have additional concerns about legal issues that -- I would encourage you to take a look at that, as well. With that, I'm going to turn it back over to Rik.

**Rik Opstelten:**

Thank you very much, Bonnie. That was very helpful explanation of some of the background of the requirements that apply to these ever evolving range of agreements between public transportation and shared mobility, and these new mobility providers. So given that background, what we've now done is we have Penny Grellier from the Mobility on Demand Sandbox project out in Tacoma, Washington, who has taken some of the considerations that Bonnie has explained, and been able to design a program to be responsive to those. We would like her to take this opportunity to share with you some of the process that she went through in setting up her experiment with us in the mobility on demand sand box, and how that has evolved. We thank you very much, Penny, for being with us today, please go ahead.

**Penny Grellier:**

Thanks, Rik. Hello, everyone. Good morning or good afternoon, depending where you are right now. I am Penny Grellier with Pierce Transit, a medium size transit agency in Tacoma, or Lakewood, Washington. And my Sandbox project will be the topic of today's discussion. I'll go ahead and advance here. So, the purpose of this project that we put together and the funding provided by the FTA's Mobility on Demand Sandbox grant, was to determine if TNCs transit companies and partners can work together to improve availability of shared use mobility options. On my slide, you can see the various partners that we worked with on the project. I'm going to go ahead and go back there. We're Pierce Transit, Lyft is our transportation networking company. We had Sound Transit, a regional transportation agency, and Pierce College, a local community college on board for the project. So, our particular project had a goal of providing first and last mile connections to transit hubs, and bus stops in areas and at times of limited service.

Pierce transit has a fairly large service area, but we admittedly do not have good service in that entire area. And so there are parts of our service area with fairly dense population that, unfortunately, would have a long way to walk to get to the nearest fixed route service. So the challenges we found with our project were the negotiations, and data sharing agreement with our transportation networking company. Also, being able to ensure equity in service provision, and that had to do with wheelchair accessible vehicles, smartphone, or no smartphone, and those who were unbanked, in other words, those among our population who did not have a credit card handy to set up an account with a TNC. Also, a challenge, which seems fairly old fashioned, but is still very true, is getting the word out effectively, and in all different kinds of ways over a long period of time. The status of our project is that we launched May 15th, 2018, the projects through sand box were initially designed to last one year, but we received permission from the FTA to extend through December 31st of this year in order to make sure we made the best use of the funds that were available to us. This little colorful map shows you the greater part of our service area in and around the city of Tacoma. The different colored areas represent the various zones we established for our partnership with Lyft. The zones were selected based on population density, walkability, and fixed route service limitations. They were also designed to meet different needs. So some provided congestion relief, whether that's traffic or parking congestion. Several provided connections to trunk routes, that is our most frequent routes with the longest band of service. And also one was designed to provide late night rides home to college students. So, we took on quite a lot with our project in so far as we were testing a variety of types of service in a variety of areas. So, a quick overview of how our project works. You download the Lyft app, and there is a promo code associated with each of the zones which you enter into your app. And then you request a Lyft ride during the days and times that your particular zone is active. One end of your trip must be one of the designated connection points where there are various types of transit service available. So this could be a bus stop or a transit center, or in one case, a sound transit train station. The ride shows up when you select it as credited fully. We are a fully subsidizing all of the rides using grant funds. And the Lyft ride comes to get you and takes you total transit point to connect to our service. If you don't have a smartphone, we ended up setting up what's called concierge service, a tool that Lyft uses basically gives you the Lyft app as a desktop tool, and our customer service representatives in our paratransit department had a special number that was assigned to this project. They answer those calls, and they dispatch the Lyft rides from their desktop, and the person on the phone is told when to expect the Lyft ride. And then it works in the other direction. If you're just getting off a bus, or if you're on a bus approaching your stop, you can go ahead and summon the Lyft ride to take you the rest of the way. Now, speaking of equity concerns, we had to make sure this was available to everyone, including those who use a wheelchair and other mobility aids. We put out two separate RFPs to try and get someone to provide that service for us. But we think because of the fact that it was so unknown as far as service levels, number of vehicles, anticipated demand, we did not have any responses to our RFPs. Lyft doesn't have a call center of their own. So, what we did was we decided to have our paratransit service, customer service agents respond to the calls. We set up a dedicated phone line, and then we trained our customer service reps on how to use the Lyft concierge tool. The calls that come in as a

side note, are -- make up less than 5% of the overall number of trips that we do through this project. So most people are using the app. We also have not had any wheelchair accessible vehicle trip requests during the course of the project. We have done outreach to a variety of groups who we felt would be the most likely to have wheelchair accessible vehicle needs. However, it's a very small portion of the population, because there are those who are deemed eligible for our paratransit services, and would likely take those, because they are door-to-door. There are those who are considered conditionally eligible, who would be the folks most likely to want to try this service, because you have to connect to transit at some point during this trip. And so if you're using a wheelchair, and you have one of our vehicles respond for the first part of the journey, you do need to be able to use transit at the other part of the journey. And so that rules out anyone who can't use fixed route transit. But, despite doing outreach as we did, we did not get any requests yet for that service. The other reason we have the phone line is because of -- there are folks who don't have smartphones. And Lyft, of course, is app-based. Some people also don't have credit cards or the wherewithal to set up an account. We have in our region an ORCA card, which is one regional card for all, or basically a card with a chip in it that you can load fare media onto. We could not, with respect to this project, connect the trips to the ORCA card in any way, just because the ORCA card technology is not advanced enough to do that. So, our response was that, again, we trained our customer service reps on the concierge tool, and then Lyft invoices us monthly separate from the app-based trips, we get an invoice from concierge trips, as well. So, I just wanted to touch briefly on how public input has shaped the project. We decided before the project even started to install ride share signage at our transit centers. Not only so -- for public to see where they could safely catch their Lyft ride, but also to keep Lyft drivers out of our bus lanes at transit centers to make it safe for our operators and buses, and for the Lyft drivers, as well. We also received feedback in the early months of the project that allowed us to expand our zones to better cover the needs of people that wanted to use the service. We also added a couple of connection points that made sense to get to transit. We adjusted the times of service in a couple of our zones so they would be able to be utilized when people needed the service. We adjusted our fixed route service in one of the areas based on findings from this project, and some other budget constraints that were happening that were cutting back on fixed route service. And then we also tried to update and simplify the messaging, because all the different zones that we have with different characteristics can be confusing to someone who is unfamiliar with this kind of project. And so we worked to make each zone -- we did targeted marketing to people in the particular zones just about their zone so it made a bit more sense to them. And then -- I just made a note that we have no direct access to about 95% of the customers using this service, and that's because Lyft does not share the identities of the users with us. So we know who those folks are that are using the concierge tool, but the rest of the app-based customers we cannot contact directly. So we couldn't do any user surveys along the way. We are doing one at the end of the project that will go out through Lyft. But otherwise we couldn't contact people for feedback in the interim. Just a quick showing of how many trips we've had per month so far over the course of the project. We did anticipate a drop in summertime, which did happen, but we've kind of leveled out now. Very proud of those 16 trips back in May of 2018, by the way. And then our top



three zones are the zone that feeds into the sound or train station, where there's a lot of parking problems around that train station, very congested early in the day. Our span away park land number two zone, rural, but it feeds into our highest ridership, a couple years will become bus rapid transit. And a couple of other areas that bring people in from kind of donut holes of service that are fairly isolated, and they bring them into connection points with several fixed route service lines available. The average duration of the trips are about 10 minutes. The average distance is 4 miles. The average trip cost is over \$11. The miniature maps are heat maps, somewhat generalized, they don't want to give us specific details. We can tell at the census block level where rides are picking up and dropping off. So, what's next? We have a rider survey that will go out through Lyft which will give us a lot more information about people's behaviors around this service, why they chose it, why they didn't choose to use it in certain circumstances. And we have an independent evaluation ongoing. We'll do a report to the community. And then per our CEO's instructions, we will continue a service in the top one or two zones, based on public response thus far and usage of the project service. There is my contact information. So there we are. Thank you.

**Rik Opstelten:**

And thank you very much, Penny. We appreciate that sort of on the ground perspective of how you have had to maybe do some things, and go in a couple of different directions to achieve the goals you have around providing service in a way that is equitable that everybody can take advantage of. We appreciate that, and I appreciate your partnership until the sand box. We've had a good number of questions so far coming from the audience. I would encourage you all to continue to post those in the chat box as the presentations continue today. We're taking those down, and after John's presentation, we're going to enter into a Q&A kind of period, and we'll be asking those questions from the chat box to the presenters, so just please continue to feed them to us in that way. So, with that, I would now like to invite to the floor John Andoh with the COMET agency. He has a really interesting perspective in having created a service in partnership with shared mobility providers that is specifically targeting very important community needs. To which there are tied some considerations around providing access that is equitable and available to everyone. And John's project outside of the Mobility on Demand Sandbox universe, but has taken many of the same kinds of approaches that Penny shared. We would like to have the opportunity to learn from him how his process of design came about, and what the result has been in terms of providing a very vital point of access to his community. John, thank you very much for being with us, please go ahead.

**John Andoh:**

Yes. Thank you for having me. Do you hear me okay?

**Rik Opstelten:**

Just fine.

**John Andoh:**

Perfect. So, about us, we are the Central Midland's Regional Transit Authority, we're a regional transportation authority in Columbia, South Carolina, where we provide transit services within two counties, Richland and Lexington counties. And the COMET is our brand name for our transit services. We provide service on 34 fixed routes, 4 reflex, 8 in rural areas, van pool, subsidy with Lyft and Uber, 10 bike shares, and ADA paratransit. We have a fleet of 81 buses and vans. We operate from 4:45 in the morning until 12 midnight on week days and 5:45 to midnight on Saturdays, and 5:45 to 11:45 Sundays. This kind of gives you an idea of our system. We have a fairly large service area. Most of our services are provided in Richland County. And then we do have some limited services that we operate in Lexington County, primarily in the western portion of the county, in the cities of west Columbia, Casey, and Springdale and unincorporated areas in the I-26 corridor, a hub-and-spoke system with a lot of our services hubbing in the downtown Columbia area. Last year, we were trying to tackle two challenges that we were facing with the COMET system—transportation at night as well as transportation to grocery stores. As relates to nighttime transportation, we were operating routes unproductive and not cost effective for us to be providing fixed route transit services, but there is still a need for people to have access to transportation at night. In addition, Columbia has significant food deserts throughout the city, and we are trying to find an easier way to get people to and from the grocery store without necessarily have to navigate the transit system, especially if you're a single parent, and you have to carry groceries, plus the stroller for your child, and you're coming from work or some other activity throughout the day. These programs that we created was to help mitigate the challenges on fixed route transit. So, we created a program in partnership with Lyft and Uber called COMET on the Go. And as part of COMET on the Go, we have COMET at Night and COMET to the Market, and soon we'll be starting COMET to Work. With both -- with these programs, we do a \$5 maximum subsidy for trips within the COMET service area. We wanted to ensure equity access for those that are using mobility devices or could not use Lyft and Uber, by creating a dedicated wave service which we use our D.A.R.T. subcontractor to operate that service with the same span that you would have if you had utilized Uber or Lyft to get to those destinations covered by our programs. And then we also made sure that we had the ability to have access for those that are unbanked, and for those that don't have smart phones to make reservations and to pay for Lyft and Uber rides. And we have approximately \$150,000 budget for the overall COMET on the Go program. So, starting with COMET at Night, it is a program that operates from 9:00 p.m. to 3:00 a.m. It operates anywhere in our service area where there's COMET fixed route bus service. What we did in the Lyft and Uber apps, we overlaid the COMET fixed route service area, basically a three quarter mile radius around any COMET route regardless if it is express route or a local route. And then we applied \$75,000 for the COMET at night program, which we split that in half, 37,500 for Uber and 37,500 for Lyft. This program replaced 12 bus routes that costed the COMET \$335,000 to operate, where they were running 1.5 passengers or less on average. In order to use COMET at night you have to get a code on the buses. We want COMET at Night to be an extension of the COMET system, not a replacement. So, at the minimum,

somebody would have to ride the COMET system 12 times a year in order to take advantage of COMET at night. Because at least we've got them on the bus, and we envision if they're on the bus, then they would perhaps continue to ride our services. Our next program is COMET to the Market. And as I mentioned, we have significant food deserts in Columbia, and access to fresh food is a challenge for residents in the city of Columbia. So, by creating COMET to the Market, we have been able to help address that challenge. We budgeted \$75,000 for this program, 37,500 to both Lyft and Uber, we allowed two trips per week, we geofenced, and also geofenced the grocery stores with fresh produce and fresh meat in Lyft and Uber. Your trip has to end or start at a fresh -- grocery store with fresh produce and fresh meats. The service operates from 6:00 a.m., to 10:00 p.m. We did a survey working in conjunction with our local council of governments to determine where all the grocery stores with fresh produce and meats are, and based on that survey we learned that a lot of those stores are open from 6:00 a.m., to 10:00 p.m. So that has been a helpful in getting people to the market. This gives you an idea of the COMET on the Go service area. The area in purple is where it's geofenced in the Lyft and Uber programs so that people know where they can actually take advantage of the program. And then the area on the map on the left is where all the food deserts are, and the areas in red in our service area shows where there is lacking of grocery stores based on census tracts. So, definitely where our COMET fixed route bus service operates is where people are taking advantage of the COMET to the Market program. One thing I do want to mention is that as part of our equity issues to ensure compliance with Federal Transit Administration requirements, we have our Wave program for those that have mobility devices that can't use Lyft and Uber, in order for a user to take advantage of that program, they would just simply have to contact the COMET the same day whenever they're ready to utilize either program, either COMET to the Market or COMET at Night, we will dispatch a vehicle to pick up that person within 90 minutes of the call. And they end up paying a flat rate of \$10. And they can use the program based on the program parameters. So we have someone available to take calls between 9:00 p.m. and 3:00 a.m., for the nighttime program and then our DART dispatchers are taking calls between 6:00 a.m., and 10:00 p.m. for the market program. For the unbanked, how we're able to address the unbanked community was we are selling gift cards at our transit center, COMET central in downtown Columbia with Visa and MasterCard logo, we encourage our riders to go to a grocery store, Walmart, local pharmacy, to purchase those gift cards as well and utilize those gift cards on our programs. We also encourage folks to purchase Lyft or Uber gift cards with designated value that they're looking for, which they can use to pay for their rides on this program. We also have learned that most of the rides can be done within the \$5 subsidy. A lot of our riders aren't traveling that far. If they exceed the \$5 subsidy, the average fare they're paying is approximately \$2.50 above the subsidy, which is fairly affordable. And this gives you an idea of some of the things we have going on at the COMET. And this is a picture of our other buses, the DART van is part of the Wave program that we utilize for folks that don't have access to the -- to Uber or Lyft. I want to add for those that don't have smartphones, we're part of Uber central and Lyft concierge, they can contact us through DART reservation center and we'll book the Uber or Lyft for them so they still have access to the system. This is my contact information, if you would like to reach out, if you want to do a similar program, and I'm

happy to answer any questions.

**Speaker:**

Thanks, John. This is Brian Jackson with the Research Office in Washington, D.C. I'm a colleague of Rik in Mobility Innovation Division. Over the last hour, we've received a variety of questions. Thank you, everyone, both for dialing in as well as sharing your questions with us. So in the interest of time, we have a few more minutes before this webinar is scheduled to end. I'm going to try to step through some of the questions that we've recorded thus far from each of the speakers. I'm going to ask each speaker to respond in kind. I'll let you know, Bonnie, John, and Penny, which question is assigned to each of you. Bonnie, this is for you. What about TNC's transportation network companies, particularly Uber pool in terms of shared or exclusive rides, how does FTA - apply to them?

**Bonnie Graves:**

If it is Uber pool or Lyft lines, then that is a shared ride service and would be eligible for FTA funding.

**Brian Jackson:**

Okay. Thanks, Bonnie. Penny, one person asked, is Lyft required to perform a level two finger print background collection to protect the riding public, and if so, how does Pierce Transit check eligibility for riders?

**Penny Grellier:**

So, part of our agreement with Lyft was that they would perform their standard driver checks. So they do -- they didn't make any changes to their driver check program, and because we were part of the Sandbox project, you know, we were looking at ways that we could work with them. And so we -- they obviously don't meet the same standards as transit operators. But because of the way that the project was structured, we were in agreement with them to just go ahead with their standard screening process.

**Brian Jackson:**

Okay. Similar question, also to you, Penny. Was Lyft required to abide by Pierce Transit's language access program?

**Speaker:**

We have it set up so if someone needs a language other than English we have a phone line that can be utilized for quite a number of languages that are prevalent in our area, and using that service, we could go ahead and schedule the ride through concierge. If they need that particular kind of help.

**Brian Jackson:**

Thank you. One last question for you, Penny. How does Pierce Transit confirm driver -- I'm sorry, you've already answered that. Could a grocery store or pharmacy also be a second destination or midday destination if it helps with the subsidies that Pierce Transit provides?

**Penny Grellier:**

No. The rides are from -- well, if a person was standing in a grocery store that's within one of the zones during the time that the zone is active, they could be picked up there. But there are no stops between pick-up and drop-off at the transit connection point or vice versa.

**Brian Jackson:**

Okay. And I'm sorry, one last question for you, Penny. Quite a few folks are interested in Pierce Transit experiment. Does your -- how does your customer service center work? With someone who needed an interpreter service, how would they be able to use the system?

**Penny Grellier:**

The customer service reps that answer these calls are usually working for our paratransit service, so I trained them on these particular kinds of calls. Again, they would refer a customer through our interpreter line, and then I suppose we would have a call with that interpreter on the line, as well as the customer service rep so the customer's ride was scheduled.

**Brian Jackson:**

Thank you. John, this question is for you. How has COMET's overall ridership increased, and by how much of the COMET to the Market and COMET at Night? Do you have any stats on that offhand?

**John Andoh:**

Yes, for COMET at Night since December of 2018 when we started the program, we're seeing gains 5 to 10% month after month. As more people get to learn and utilize the program and it has contributed to our overall unlinked passenger trip increases to the transit system. COMET to the Market is actually growing faster than COMET at Night, which is not surprising because of the fact that people have been wanting better access to grocery stores for some time. And we've seen 10 to 15% increases month after month. We have some good controls in place to make sure that fraud doesn't occur on the program so that we also stay in line with our budget, and when we did our recent budget to actual reconciliation, we're still on par with expending the appropriate budget amounts for both of those programs.

**Brian Jackson:**

Thank you. Also to you, John, what type of grant is the COMET using to operate this service?

**John Andoh:**

Right now we are using our local funds to cover this. So basically our local sales tax revenues is covering the program.

**Brian Jackson:**

Okay. Thank you, again, in the interest of time, again, we are still getting questions, thank you, we're really glad that you all are very interested in this. We'll try to follow up once we present the slides, make them available for everyone to download later on this week. We'll try to provide responses as to the questions that we've gotten. So, with that, turn it back over to Rik, if you want to make closing remarks.

**Speaker:**

There's been a question here that I do want to get to; this one will probably be best answered by Bonnie. The question is, are we aware of cuts for fixed route services that happened after a partnership is established with the -- service, and are we looking at those potential changes -- is there any particular thought to the monitoring of that when it comes to -- process or something you can speak to in terms of the protocol impact to the traditional service by virtue of these kind of new service routes?

**Bonnie Graves:**

I don't think we've heard anything specific about -- route service and negatively impacting riders. So, certainly I saw something about complaint process for people with disabilities, the first line of complaint always is to the transit agency, and the second line is -- but you always start complaint processes with the transit agency. Any time somebody cuts fixed route service, everybody defines what a major service change is for themselves from a Title VI perspective, and also from a 6307 perspective to the public -- station process is necessary under Section 5307 in urbanized areas if you have a major service change, that -- any type typically a cut of a line is almost always going to be considered a major service change, but that, again, that's defined by the transit agency. So, that's up to you and your policies as to what is considered a major service change.

**Brian Jackson:**

Thank you for the explanation. John has been good to respond to the chat box. John, did you want to take a second and speak to the process that you all went through in looking at changes to your service?

**John Andoh:**

Yes, in the summer of 2018, we did a series of public workshops, we did a formal announcement that we wanted to create a COMET on the go partnership with Lyft and Uber after we solidified agreements with them. And we talked about what programs we would create, and we sought public feedback in accordance with fare and service policy. We did caution the public that we will be eliminating service on some of our transit routes that operated later than 10:00 p.m. and shift those folks to the COMET at Night program. Then we brought this before our Service Committee, which they held a workshop session in August to understand how this would work. The impacts, the education, process to folks on how to utilize this program. Some of our economy members had concerns about folks not understanding technology and understanding

this replacement service and were concerned that it wasn't going to work. We did have a public hearing before the Board of Directors and ultimately at the September 2018 Board of Directors meeting they did approve the implementation of this program. So we treated it as if we were implementing a new bus route or taking away a new bus route to make sure we were compliant with our fare and service change policy.

**Speaker:**

Thank you very much for explaining that process. It's important to ensure that there is that level of input into those kinds of design changes. Thank you, also, by the way, for referencing your availability of fresh produce at your transit center.

**John Andoh:**

Yeah, of course.

**Speaker:**

So, at the same time, Penny has been answering questions in the chat box. Penny, we thank you for that. I don't know if we have had in the meantime other questions come across the chat that are directed toward any of our speakers. Brian, do you have any there in -- at HQ that we have yet to answer?

**Brian Jackson:**

No.

**Speaker:**

Okay. Let's take a moment's time. I see there are some -- it says multiple attendees are typing. We have a lot of typing going on in the chat box. We'll leave things open for a moment, if anybody wants to conclude their typing and answer a few more questions for a second or two, if our speakers don't mind. Here we go. And so, John, can you speak to a moment about how you determined what was a food desert in part of your planning?

**John Andoh:**

Yes. So working with our Council of Governments and the State of South Carolina -- I believe Department of Agriculture, they have a statewide database that's tracking based on census track where all the food deserts are. So, as you can see on this map that I put back on the display, all the areas in red within census tracks do not have a grocery store with fresh produce or fresh meats. So, we overlaid the COMET fixed route bus system to just get an idea on how long it would take a user to use our fixed route bus system to get from one portion of a food desert area to the nearest grocery store, and based on our current system design learned that for some people it could take upwards of an hour to an hour-and-a-half just to get to a grocery store. This information was the catalyst to help us get Uber and Lyft engaged on wanting to do a program like this.

**Speaker:**

Thank you for the explanation. Looks as if we might still have people -- thank you, John, for that. We're joined, and thanks for your explanation. I'm going to bear with people as

they type a few seconds longer, if there are any remaining pressing questions we can answer in the next minute or two. Sure, there is one other, thank you for the reminder. A question from Diane Northrop to John or Penny—is anyone requiring Lyft or Uber to -- alcohol programs?

**John Andoh:** I can answer on the case of the COMET. We purposely wanted to have both Lyft and Uber participate in this program. We do freedom of choice, so State laws apply when it comes to background checks and drug and alcohol testing of Lyft and Uber drivers. If I understood correctly, if we had only had one contract, then I think we -- then we had to have the drug and alcohol testing rules apply. Just to be clear, it is not about having Lyft or Uber set up a drug and alcohol testing, it is including the Lyft and Uber drivers in the transit agency's testing program.

Thanks, Bonnie, for that clarification. Again, I would refer folks to Bonnie's earlier slides that provide some of the kind of high level information to those points, and there are some links that she offered that provide additional information. To that point about links, the notes page on the section of the webinar system to the left there has a link to the site where we're pasting the recordings of this session as well as agreements, and we will also there provide links, for example, to our shared mobility FAQs, and business section on drug and alcohol testing, as well as there is for ADA service -- for people with disabilities. So, you can delve deeper into questions there. So, sorry, looking at question. Again, in terms of complaints, as Bonnie referenced, first you're looking at contacting the transit agency FTA Office of Civil Rights, also, has a process where you can provide information, may have to do with the possible question of that, you can find that on FTA's website. If there are questions there that can be directed in that direction. I apologize. So, given that we seem like we've maybe gotten through the majority of questions. I don't see that same fury of typing happening in the chat box. Let me once again thank, as Brian did, our speakers. Bonnie, Penny, and John, we thank you very much for taking the time to share your experience, and your wisdom with us, we hope that it has been informative for those of you in the field to learn from our speakers today and to have some exchange happening also in the chat box. Again, we're going to have additional resources made available to you and links to other resources, too. We have a great deal of information available about projects happening all around the country in this shared mobility space. We have a partnership with the Mobility Center, Mobility on Demand Learning Center, meet all manner of case studies, and project-related documents. So, a great deal of information will be made available, already to be found in other parts of the internet, as it were, and FTA's website where you can continue to learn and delve more and expand your learning in this space. Again, thank you to everyone, we look forward to the next time we're able to have this kind of exchange, as we continue to process what we've learned from the Mobility Sandbox and our partner agencies around the country. Much appreciated, have a good rest of your days.

**Speaker:**  
Thank you.