

Respondent		Comment	Proposed Response	Document Impact
Electronic Frontier Foundation	1	LADOT Fails to Acknowledge the Sensitive and Personal Nature of the Information of Granular Trip Information.	Most privacy experts agree that anonymized location data (latitude & longitude coordinates) can be used to re-identify a person through analysis of travel patterns and other data (like address, name, work address). Acknowledging this, LADOT has and will continue to consider all data from Dockless Mobility Providers as Confidential Information, making it exempt from California Public Records Act (CPRA) requests and subject to restricted access per the City Attorney and the City's Information Handling Guidelines.	No
Electronic Frontier Foundation	2	LADOT Has Failed to Set Out Detailed Policies Limiting the Use and Retention of Precise Location Data.	Regarding use: LADOT will use mobility data to verify that permitted dockless mobility companies are complying with the terms of their permit and other City regulations. Additionally, mobility data allows LADOT to better understand dockless mobility users' infrastructure and safety needs. To date, LADOT has used mobility data to monitor companies' compliance with authorized fleet size, service requests, and/or violation rectification as well as to review whether vehicles are distributed in lower-income, disadvantaged neighborhoods. Regarding retention: The City of Los Angeles' Information Handling Guidelines gives guidance on data retention and LADOT is following this guidance for all dockless scooter data. LADOT is considering refining its data retention policies further for the purposes of this program.	No
Electronic Frontier Foundation	3	LADOT Has Failed to Commit in Writing to Require a Warrant for Location Data.	LADOT has committed in writing to the following in its first draft of its Data Protections Principles: <i>LADOT will follow all existing legal process rules and laws. Law enforcement and other government agencies, whether local, state, or federal will not have access to raw trip data other than as required by law, such as a court order, subpoena, or other legal process.</i>	No
Electronic Frontier Foundation	4	LADOT Has Been Sharing Geolocation Data With At Least One Third Party Without Appropriate Privacy Protections.	LADOT has drafted a Third Party Data License Agreement that includes data protection provisions, such as: >> access-point location requirements >> access limitations >> security best practices >> credential restrictions The Agreement will require any City Contractor or Subcontractor to implement system administration and network security measures, such as: >> application security and software development controls >> antivirus >> vulnerability management and patching >> logging and monitoring >> vulnerability and risk assessments	Update 3rd party access language to make reference to the Third Party Data License Agreement.
Electronic Frontier Foundation	5	The MDS Violates the California Electronic Communications Privacy Act.	Comment noted. LADOT's current understanding is that the intent of the CALEPCA was not to regulate dockless shared mobility.	No
Electronic Frontier Foundation	6	LADOT Has Failed to Consider Privacy-Protective Solutions.	LADOT takes privacy seriously. The One Year Dockless Mobility program is designed to exceed the criteria set forth in the City of Los Angeles' Information Handling Guidelines, while also developing more specific privacy protections around the program as noted in the Data Protection Principles. LADOT has also worked with privacy experts to further refine its Data Protections Principles.	No
Electronic Frontier Foundation	7	LADOT should disclose specific aggregation, obfuscation, de-identification, and destruction details.	LADOT will not release any data on an open data platform until aggregation and destruction details are complete.	Added this language as clarifying language to the Principles document.
Electronic Frontier Foundation	8	LADOT should describe its data security controls and data breach protocols.	The City of Los Angeles was named the Number 1 Digital City three years in a row for its Cybersecurity, Data Protection, and Consumer Privacy Practices. In 2013, Mayor Garcetti signed Executive Directive #2 requiring all departments to participate in a Cyber Intrusion Command Center and requiring all departments to follow strict guidelines on Cyber Security Protocol set forth by the Information Technology Agency and its Information Technology Policy Committee. The City of Los Angeles was the first city to launch America's first city-based Cyber Lab. LADOT has worked and will continue to work with the City Information Technology Agency and other data protection and security experts to implement additional data security controls and data breach protocols for the purposes of this program.	No

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Uber/Jump	9	The Principles must be updated to clearly state that Trip Data is Personal Information.	See comment 1.	No
Uber/Jump	10	The Principles must describe how the City intends to use the data it collects.	See comment 2.	No
Uber/Jump	11	LADOT should adopt and disclose a specific aggregation standard.	See comment 7.	No
Uber/Jump	12	The City Must Implement Data Security Controls and Data Breach Protocols.	See comment 8.	No
Uber/Jump	13	LADOT must uphold its promise to strictly limit sharing with law enforcement and third parties such as Remix.	See comment 3 and comment 4.	No
Uber/Jump	14	The City did not engage the public in meaningful debate about the MDS.	<p>The City has engaged in a year-long public discussion around dockless mobility regulation in Los Angeles, inclusive of MDS and permit data sharing requirement. The Los Angeles City Council has publicly reviewed the regulations multiple times and LADOT has undertaken community outreach across the city, which will continue this outreach effort over the course of the pilot. On September 13, 2018, the Los Angeles City Council adopted Ordinance Number 185785 adding section 71.29 to the Los Angeles Municipal Code authorizing LADOT to implement a Shared Mobility Device Pilot Program and issue permits to authorized Mobility Service Providers. The Ordinance makes reference to LADOT's dockless mobility operating procedures and guidelines which introduced the requirement for compliance to MDS.</p> <ol style="list-style-type: none"> May 3, 2018 - the initial version of the City of Los Angeles Mobility Data Specification is made open source through GitHub. May 12-14, 2018 - LADOT introduces APIs that we know today as Agency APIs. June 27, 2018 - LADOT provides City Council with proposed Dockless On-Demand Personal Mobility Rules and Guidelines. September 12, 2018 - LADOT hosts an open, in-person and online technical workshop to provide details on the dockless mobility permit process including i) structure of the Conditional Use Permit (CUP) period; ii) structure of the One-year period; and iii) the requirement of compliance to the MDS in each period. October 1, 2018 - Conditional Use Permit period for Dockless On-Demand Personal Mobility begins. November 14, 2018 - LADOT hosts a public Developer conference to provide an overview of the permit process and review the MDS roadmap. January, 2019 - Los Angeles City Council grants a 45-day extension making the CUP expiration March 13, 2019. February 1, 2019 - LADOT initiates the one-year permit process including the requirement of full compliance to the MDS. LADOT notifies all potential dockless mobility permit applicants that full MDS compliance will be required on April 15, 2019 representing a 30-day grace period between LADOT issuing the one-year permit and MSPs requirement for MDS compliance. March 22, 2019 - LADOT posts the Data Protection Principles that will apply to all data we obtain from Mobility Providers with an initial two week comment period that ended on April 5, 2019. April 12, 2019 - LADOT publishes revised Data Protection Principles and all comments received within the public comment period. 	No

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Lyft	15	LADOT would collect highly granular real-time and slightly delayed data that would allow the City to track the precise movements of our customers. Real-time tracking amounts to an enormous privacy invasion with numerous unintended consequences.	While Mobility Providers share only limited vehicle information with the City of Los Angeles, LADOT understands the sensitive nature of this data. LADOT designates this trip data as Confidential Information under the City of Los Angeles Information Handling Guidelines, which also means this vehicle information is exempt from release under the California Public Records Act. LADOT receives far less information and less precise information than the Mobility Providers have. LADOT does not get any information about a customer on a device, such as address, income, etc. Further, LADOT intends to use the data only for the express regulatory and planning purposes described in the Los Angeles City Council regulations. LADOT will ensure the data is de-identified in accordance with established data protection methodologies before any Dockless Mobility data begins to be published to the City of Los Angeles Open Data Portal.	No
Lyft	16	Agency-API does not follow the LADOT's own principle of Data Minimization outlined in its Privacy Protection Principles.	Insufficient information to respond. LADOT's review of Agency API is that it fully complies with the Data Protection Principles.	No
Lyft	17	There are many unresolved questions and serious issues relating to LADOT's use of Remix to ingest, store, and interpret data collected through Agency-API.	See comment 4.	No
Lyft	18	Agency-API results in unprecedented government control over an individual's right to make purchasing decisions by locking out access to individual scooters until the government deems it is appropriate.	The MDS Agency API provides information to the Mobility Providers. The Mobility Providers determine what action or communication, if any, to provide to their riders. Agency API does not give the City the ability to direct, change, or limit the behavior of a rider.	No
Lyft	19	The data sharing standard unveiled by LADOT may be particularly problematic if adopted outside Los Angeles.	Insufficient information to respond. LADOT's Data Protection Principles are only intended to inform the Dockless Mobility Program in the City of Los Angeles.	No
Lyft	20	What are LADOT's explicit use cases for this data and what is LADOT's commitment to using the data only for these purposes? Is LADOT collecting only the minimum amount of data necessary to achieve these goals?	See comments 2 and 6.	No
Lyft	21	Who will have access to data collected through Agency-API? What legal, technical, and organizational measures will be taken to protect customer information?	See comment 1, 3 and 4.	No
Lyft	22	How will Remix be held accountable for securing and limiting use of data collected through Agency-API? Will they be restricted from reusing or selling data or insights?	See comment 4.	No
Lyft	23	How will LADOT protect Agency-API data from being disclosed as a result of public records requests?	See comment 1.	No
Lyft	24	How is LADOT vetting their policies with privacy and security experts? What is being done to remedy any concerns or vulnerabilities?	LADOT engaged in multiple discussions with privacy and security experts to refine its Data Protection Principles. We received and reviewed comments from the City's internal experts at ITA to ensure the data receives the same care and handling as other sensitive and confidential data the city collects. See also comment 8.	No
Lyft	25	Is Agency-API compliant with the California Consumer Privacy Act and the California Electronic Communications Privacy Act?	Per the City Attorney, the California Consumer Privacy Act does not apply to government agencies. However, LADOT does not intend to put companies at any risk once the CCPA becomes law. Per the City Attorney, our Dockless Mobility Permit requirements also do not put companies in a position where they would violate this act. See comment 5 re: CalECPA.	No
Brentwood Neighborhood Council	26	The API's provide no way for a feedback loop to indicate how and when \$197 sidewalk ticketing occurs on scooters and when the money is paid to the City.	LADOT is collecting the minimum data necessary to regulate private for profit vehicles in the public right of way. This request exceeds that data minimization requirement.	No

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	27	The API's do not generate a hexbin map of origin/destination - we have to collect data and do it ourselves. Tracking the exact whereabouts of every vehicle is necessary ensure the vendors comply with the permit requirements.	See comment 26.	No
	28	All photos uploaded to My311 should provide the embedded information to denote time, location of photo - there is no reason to protect that information if it is being used to enforce the permit.	Comment noted. LADOT has referred this comment to ITA.	No
	29	The City has absolutely no way for the LAPD to enforce the permit ticketing for sidewalk riding - the entire data collection and API calling fails to address any of it.	LADOT has referred this comment to LAPD. However, LADOT is only collecting the minimum data necessary to regulate private for profit vehicles in the public right of way. This request exceeds that data minimization requirement.	No
	30	LADOT has issued permits with no regard to community and specific plans. Every vendor has to obtain Design Review Board approval and you don't mention any of this in the permit process.	See comment 14.	No
M Chapman	31	Scooters (and bicycles) regularly ride on the Washington Blvd sidewalks.	Comment noted. LADOT has referred this comment to LAPD.	No
	32	Scooters (and bicycles) regularly violate the recently modified traffic signal at Washington & Pacific. In particular, bikes & scooters cross with pedestrians rather than with traffic. Also, cars block pedestrian crosswalks and illegally turn right on red lights.	Comment noted. LADOT has referred this comment to LAPD.	No
	33	Scooters, bicycles, skateboards (electric & carelessly ridden human-powered) regularly ride on Ocean Front Walk.	Comment noted. LADOT has referred this comment to LAPD.	No
	34	Signage does not appear to tell scooters where they CAN ride.	Comment noted. LADOT has referred this comment to the Recreation and Parks Department.	No
	35	Pedestrians are all over the bike path. If we expect bicycles & scooters to avoid Ocean Front, it seems only fair to expect pedestrians to stay off the bike path except to cross it.	Comment noted. LADOT has referred this comment to the Recreation and Parks Department.	No
	36	Scooters have been proven considerably more dangerous than autos or bicycles in terms of injuries and deaths. Additional signage (including telling scooter riders where they SHOULD ride instead of only where they should NOT ride) along with consistent enforcement will increase the safety and enjoyment of all.	LADOT determines this to be an inaccurate statement. Please see visionzero.lacity.org to learn more.	No
M Harris	37	Which of the providers you have approved the permits for and will more providers (such as Skip) be signing up for the program as well?	Please see ladot.io/programs/dockless .	No
R Rense	38	The streets are horribly congested. People ride scooters on sidewalks, on the wrong side of the street, in crosswalks, through red lights, through stop signs, while wearing headphones, etc.	Comment noted.	No
J Murez	39	People who charge devices must be able to prove they have a legal power bill in their name at an address where such a device would not create another violation of the building code by charging there.	Comment noted.	No

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J Hilberman	40	What if the scooter co was fined for every machine parked improperly, and passed the cost on to the user (as they know who it was)?	Comment noted.	No
A Percus	41	Why are you required to be 18 years or older to ride a scooter when the legal age to drive a vehicle is 16?	Comment noted.	No
A Palacios	42	Suggested locations for parking zones.	LADOT will consider suggested locations as part of its Dockless Parking Zone program.	No
D Brown	43	Sidewalk riding enforcement	Comment noted. LADOT has referred this comment to LAPD.	No