

**Emily Gordon - Lime public comments on East Lansing draft scooter regulations**

---

**From:** Scott Mullen <mully@li.me>  
**To:** <council@cityofeastlansing.com>  
**Date:** 2/5/2019 4:26 PM  
**Subject:** Lime public comments on East Lansing draft scooter regulations  
**Cc:** George Lahanas <glahana@cityofeastlansing.com>, <baumannt@msu.edu>  
**Attachments:** LIME public comment on East Lansing scooter regs Jan'31.pdf

---

Mayor Meadows, Members of the City Council, Manager Lahanas, and Chair Baumann:

I hope this note finds you well. Attached please find my comments on the draft scooter regulations currently under development. I look forward to continue working with the City to finalize a framework that will benefit all and truly transform mobility in the region.

My best, Scott



Lime

Scott Mullen  
Director of Expansion, Northeast  
[781-999-1943](tel:781-999-1943)

[Your ride anytime.](#)  
[We're hiring!](#)



January 31, 2019

Neutron Holdings, Inc, dba Lime  
1 Sansome St, Suite 2100  
San Francisco, CA 94104

City of East Lansing  
Attn: City Council  
410 Abbot Rd  
East Lansing, MI 48823

Mayor Meadows and Members of the City Council,

I am pleased to submit these written comments with regard to the draft ordinance to create licensing and regulation of dockless scooter companies. The first draft is comprehensive and one that Lime can support in large part. Below are a few points of clarification that I feel compelled to raise.

- Sec. 8-606. License issuance, fees. === Lime supports the calculation of fees on a per trip basis and recommends \$0.05 per trip. We also look to the cities in which we operate for accounting of how those monies will be allocated. Hopefully, they will be put toward testing out pilot infrastructure to support ridership, thus creating a virtuous cycle. With regard to proposed \$5,000 licensing fee, we find this prohibitive but could support something much lower. It's crucial to think about our fleet in a larger, regional context since our scooters cross municipal lines regularly. Any fee structure that East Lansing implements will likely be copied by neighboring communities which makes the entry costs prohibitively high. I should note that we declined to launch a fleet in Ann Arbor due to a similarly prohibitive fee structure.
- Sec. 8-610 (1): We have the technical ability to limit speeds based on geo-fenced zones but prefer to use that as a last resort since it creates a negative user experience and potential confusion about the health of the scooter. I am happy to further discuss this and other ways we can solve for the potential issues you're trying to address.
- Sec. 8-610 (2): All Lime scooters have a unique ID number and QR code mounted in multiple places. The proposed requirement for unique identifier to be in minimum 2" font will be difficult to comply with due to lack of available surface area. It is worth noting that



- we've tried to comply with similar requirements in other cities – for example Austin, Texas – and the requirement was scrapped after a short pilot period. I'm happy to work with you to determine what the desired result is and how we may be able to get to the outcome you want in a different and more practical way.
- Sec. 8-610 (8): Regarding our community outreach “..at the person or entity's own cost”, we would look to the City to assist us in developing our goals and targets and we would ask for introductions to relevant stakeholder groups and coordination to ensure we are successful in our outreach, especially to underserved communities.
- Sec. 8-610 (12): We are happy to develop our 'hotspot' map of deployment zones in coordination with the City to ensure our team is placing scooters in optimal areas for best and seamless service of the community.
- Sec. 8-610 (13): While most of our vehicles come in for charging each night, some stay out to serve 3<sup>rd</sup> shift workers and others who may come to rely on our scooters for their daily transportation needs. We would look for some flexibility here in the interest of being a reliable service for all.
- Sec. 8-610 (14): Similar to the section above, our scooters should be seen as a reliable service that people can count on and thus we would seek permission to operate year-round, weather permitting of course.
- Sec. 8-612 Reporting Requirements: Lime already offers East Lansing officials access to a robust data dashboard that contains much of the information outlined here, and much more. We have granted the same access to CATA to aid in the development of their forthcoming regional mobility plan. We have likewise made this information available to Michigan State University. I look forward to discussing the power of our data in more detail and how East Lansing might take advantage of it for planning purposes.

At Lime, our goal is to bring sustainable, active, low-impact transportation to the region and we do that at no cost to the cities in which we operate. We were thrilled at the opportunity to operate in East Lansing last autumn and look forward to the conversation about coming back in the spring. Thanks for your consideration on the above points. I am happy to meet in person or by phone to discuss further.

My Best,

Scott Mullen  
Director of Expansion, Northeast

Cc: George Lahanas, City Manager  
Thomas Baumann, East Lansing Transportation Commission Chair