District of Columbia Government
Advisory Neighborhood Commission 6A
PO Box 15020
Washington, DC 20003

October 11, 2026

Director Sharon Kershbaum
Jason Rubinstein, Office of the Director
Ted Randell, Office of Micromobility
District Department of Transportation

Via email and the TOPS Website

Re: ANC 6A Comment Letter - Shared Fleet Devices (Notice ID N146433), 73 DCR Vol. 73/36, published September 4, 2026

Dear Director Kershbaum, Mr. Rubinstein and Mr. Randell,

At a regularly scheduled and properly noticed[1] meeting on October 8, 2026 our Commission voted 4-0-0 (with 4 Commissioners required for a quorum) to send this comment letter to DDOT regarding the Notice of Proposed Rulemaking to amend the rules and regulations concerning shared fleet micromobility operation in the District of Columbia.

Over the past several months, ANC 6A's Transportation and Public Space Committee has discussed issues and concerns related to shared fleet micromobility devices. This included a meeting with Ted Randell in DDOT's Micromobility Office and another meeting with representatives from Lime and Veo.

ANC 6A applauds DDOT for implementing some of the changes that were discussed at these meetings, including updated speed limit changes to allow all devices to operate at 15 mph in the road and requiring improved sidewalk detection technology on all devices operating in DC. The Commission appreciates the new requirements for: shared fleet devices to be able to change speed limiting between roads and sidewalks; audible messages to encourage safe riding; and push notifications regarding restricted areas and riding. ANC 6A also appreciates the amendments to address underage riding, which at least anecdotally appears to be linked to some of the unsafe operation witnessed.

The Commission also appreciates the changes to DDOT's Low Income Customer Program (LICP), which appears to be linked to much of the underage riding. The new rule's restructuring of the central LICP benefit to move it from unlimited rides under 30 minutes to a fixed monthly benefit of 300 minutes that don't roll over (plus a 50% discount on fees after that) will disincentivize the sharing of LICP accounts with underage family members while still providing ample and affordable usage to neighbors in need. Account holders will still be able to use shared fleets for commuting, errands, and recreational travel.

[1] ANC 6A meetings are advertised electronically on anc-6a@googlegroups.com, and in newhilleast@groups.io, at www.anc6a.org, and through print advertisements in the *Hill Rag*.

While ANC 6A generally supports the amendments to shared fleet device rules, we recommend additional changes to the proposed rule, with an emphasis on shared fleet operator ("Operator") accountability and timely enforcement, including:

1. **Sidewalk Speed Limits and Geolocation**

    a. Sidewalk riding speeds should be set to 6 mph instead of 10 mph. This would be more in line with jogging speeds already experienced on the sidewalk and promote safer operation among pedestrians.
    b. Operators should be required to have devices that gradually (for example, for no more than 60 seconds), decelerate from 15 mph to 6 mph when sidewalk detection speed limiting begins. This will prevent riders unaccustomed to new speed limiting from crashing or otherwise injuring themselves.
    c. The geolocating devices must be accurate within much less than one meter for sidewalk detection purposes. If those devices cannot yet produce this level of accuracy, other methods of detection should be used. After research, ANC 6A recommends requiring camera-based sidewalk detection. ANC 6A gives deference to DDOT on which method is best but believes that shared fleet operators should be required to use the absolute best sidewalk detection technology available.

2. **Education and Safety**

    a. Operators should be required to encourage helmet usage both in their apps and through audible reminders from the device.

    b. Operators should also be required to encourage safely and kindly sharing space on sidewalks and streets while operating and storing devices.

3. **Parking Enforcement and Hubs**

    a. **Enforce existing parking rules.** Commissioners and residents regularly see devices left on sidewalks, curbs and crosswalks, unlocked, despite the rules the NOPR retains (§ 3314.34). DPW and other authorized personnel should routinely ticket operators for improperly parked devices; operators can seek to recover the cost from riders.
    b. **Clarify the two-hour clock.** The NOPR penalizes failure to move a device within two hours of "notification" (proposed § 4316.4(b)) without saying who must notify. The clock should start at the submission of a 311 report, a report to the operator, or the operator otherwise learning of the problem (including through its own GPS or camera data).
    c. **Strengthen hubs.** The NOPR makes hub incentives optional and requires one preferred hub per ward only if incentives are offered (§§ 3314.5(k)(3), 3314.36). Operators should be required to offer meaningful incentives, with hubs scaled to fleet size and equitably distributed within each ward.

**4. Rider Verification and Accountability**

a. Operators should be required to use effective systems to verify, at the start of each ride, that the rider is the account holder and meets the minimum age.
b. Operators should be able to identify the rider of any device involved in a crash or alleged crime and provide that information to law enforcement when required by law. Failure to do so should carry a meaningful penalty for the Operator.
c. Habitual violations by a rider of Operator Terms & Conditions, including unauthorized account sharing, should result in loss of access. Bans from shared fleet devices should be temporary and proportionate, comparable to how the District suspends a driver's license: for a defined period based on the severity and frequency of violations, with notice, an opportunity to appeal, and automatic reinstatement once the period ends and any required safety training is completed.
d. Operators should safeguard devices against hacking and tampering, to the extent feasible.

**5. Unsafe Riding**

a. Operators should be accountable for promptly detecting and ending rides involving two or more riders, underage riders, and/or riding in restricted areas.

**6. Reducing Sidewalk Conflicts**

a. Within one year after reduced sidewalk speeds are implemented, DDOT should publish an evaluation of the potential need, risks and benefits of expanding the areas where shared fleet devices may not be ridden on sidewalks beyond the Central Business District. Reduced sidewalk speed zones focusing on busy commercial corridors such as H Street NE and areas near schools, daycares, playgrounds, senior centers and health facilities should also be considered. Any restrictions should not impact mobility devices used by people with disabilities.
a. The NOPR's audible and visual alerts appear aimed at riders (§ 3314.5(u)(3)). While these alerts are crucial for improving rider behavior, they fail to provide vital situational awareness to nearby pedestrians. As currently written, these prompts are localized to the rider and easily masked by urban ambient noise. We urge the agency to amend this section to require that audible alerts triggered by high-risk infractions—specifically sidewalk encroachment and geofenced over-speeding—emit an external acoustic notification of sufficient volume to warn nearby pedestrians, ensuring that vulnerable users have adequate time to react and avoid conflicts.

7. **Consistent Standards and Performance Accountability**

Uniform requirements and enforcement across all Operators will keep weaker safety practices from becoming a competitive advantage.

a. Beyond the monthly reporting the NOPR requires on sidewalk detection and incentive use (§§ 3314.5(u)(4), 3314.36(e)), operators should report standardized monthly data on parking compliance and response times, rider verification and underage use, and enforcement actions.
b. The NOPR ties fleet increases and revocations to deployment, ridership and low-income participation (§§ 3319.1–3319.9). DDOT should add minimum safety and compliance targets, so

operators that miss them face a smaller fleet, fines or permit suspension, and those that exceed them can earn increases.

Another issue which may need to be addressed in a different rule or approach all together that ANC 6A supports would be increased micromobility education. As high school students approach the age where they will legally be able to operate shared fleet devices, the Operators could visit high schools in D.C. to provide instruction on the law and safe riding. Existing law (D.C. Code § 50-2201.03c) already requires Operators to offer an optional free monthly class, in person or virtually, on the law, safe operation and parking of devices. DDOT should ensure Operators actively promote that class, and school visits would build on it.

Separately from this rulemaking, DDOT, and D.C. government more generally, should explore all avenues to prevent the sale and operation of e-motos/class 3 e-bikes that exceed the District's e-bike limits (750 watts; assist up to 28 mph). New York City has begun working on this via cease-and-desist letters to online retailers and manufacturers that sell such illegal products to NYC residents. DDOT and the Council should also consider sidewalk limits for privately owned, throttle-based devices above a set weight or size, particularly delivery vehicles, with MPD and DPW able to ticket their owners.

ANC 6A appreciates DDOT's efforts to amend shared fleet micromobility rules to create a safer environment for all street and sidewalk users. Many of the changes will help to create a better experience for all parties. And we believe the additional suggestions would help further strengthen the proposed rule amendments if adopted.

Thank you for giving great weight to the recommendations of this Commission. I can be contacted at 6A04@anc.dc.gov.

On behalf of the Commission,

Amber K. Gove

Amber Gove
Chair, Advisory Neighborhood Commission 6A

CC: Councilmember Charles Allen (callen@dccouncil.gov)