DEPARTMENT OF TRANSPORTATION

PROPOSED USE POLICY
Data Sharing Agreement with Dockless
Mobility Service Providers for Program
Management and Enforcement

Kerby Olsen, Shared Mobility Coordinator
Parking and Mobility Division
Department of Transportation
City of Oakland
May 31, 2019

1. Purpose

The City of Oakland Department of Transportation (DOT) intends to enter into data sharing agreements with existing and future dockless mobility service providers operating in Oakland, such as, but not limited to, GPS-enabled dockless bikeshare, e-scooters, and shared vehicle or ride providers who work within the public right-of-way. This agreement would allow dockless mobility operators to share anonymized trip and parking data, as defined by the Mobility Data Specification (MDS), with DOT.

DOT requires trip and parking data from dockless mobility service providers in order to effectively manage their impact on the public right-of-way. This includes enforcing permits, communicating events and informing transportation planning and policy.

By requiring operators to be transparent in their operations through the sharing of data, DOT can monitor compliance and ensure operators are meeting demand, equity goals, and responding to complaints.

2. Authorized Use

Access to trip and parking data shared under this agreement will be limited to designated officials within DOT solely for the purposes of enforcing permits, communicating events and informing transportation planning and policy.

Transportation planning and policy purposes include, but are not limited to:
   a) Understanding utilization rates
   b) Designating dockless mobility-related infrastructure (parking zones, bike lanes, etc.)
   c) Prioritizing infrastructure improvements
   d) Monitoring safety and collisions
   e) Permit Enforcement

3. Data Collection

DOT is not involved in the collection of dockless mobility data. Data is generated by GPS-enabled dockless vehicles and collected by each individual dockless mobility service operator.

4. Data Access

Authorized staff may be from the City's Department of Transportation (DOT) Parking and Mobility Division or other DOT teams that contribute to the planning and monitoring of dockless mobility programs and infrastructure.

Data will be accessed through a third-party mobility management platform. Authorized users of the data platform will require a unique username and password. Any data stored and used by DOT outside the platform will have first been aggregated by the third party mobility management vendor to the block or street level, removing privacy risk, and will therefore not require strict access controls.

5. Data Protection

DOT will depend on its third-party vendor to securely store, transmit, and audit the data. DOT has not yet undergone the procurement process for the third-party vendor, and therefore does not know the official data protection protocol. However, the third-party vendor will adhere to industry standards for encryption, transmission, logging, and auditing.

As an example of industry best practices, one possible vendor, Remix, outline's their data security protocol on their website here: https://www.remix.com/security. Other vendors follow similar operating procedures.

6. Data Retention

Raw data may be stored by the third-party vendor for no more than 2 years and will be deleted after being aggregated to the block or street level. If the contract between the third-party vendor and DOT is severed, all data will be deleted from third party servers.

7. Public Access

The public may access trip and parking data through public records requests. However, DOT will only release data in a highly aggregated and obfuscated form to the point where privacy risk is removed.

8. Third-Party Data-Sharing

Data shared by dockless mobility service providers under this agreement will be ingested, aggregated and stored by a third party primarily to reduce privacy risk. In order to protect raw data from public records requests, DOT will not ingest, store, or access raw trip data. A third-party aggregator reduces the risks of surveillance and re-identification. In addition, because this

DRAFT – FOR DISCUSSION PURPOSES ONLY

is real-time data, the ingestion and management of data this size is time and labor intensive. DOT does not have the staff capacity to do this work in-house.

9. Training

Training will be provided by the third-party mobility management vendor and will be limited to authorized DOT staff. Staff will direct the third-party vendor to incorporate this use policy and related privacy policies and procedures into its operating procedures.

10. Auditing and Oversight

Auditing procedures will vary depending on the third-party vendor and will follow industry best practices. Industry best practices include logging and reporting data using systems such as AWS CloudTrail or Google Cloud Audit. The third-party vendor will also engage an external team for a regular review of security practices to ensure they are up to standard and follow best new industry practices.

11. Maintenance

The third-party vendor will maintain and manage trip all raw trip and parking data.

Questions or comments concerning this draft Use Policy should be directed to Kerby Olsen, Shared Mobility Coordinator, Parking and Mobility Division, via email at kolsen@oaklandca.gov or phone at (510) 238-2173.