



**Directorate of Urban Land Transport**

**Response to clarification requests and queries formally submitted on the Permit Application during the stipulated time for response after Operators' Meet conducted at the office of the DULT on 19 January 2018**

SL #	Topic	Suggestion from operator	Remarks from DULT team
1	Bicycle	Front light for bicycle to be made recommendatory instead of mandatory as it can be prone to theft and vandalism	The conditions of the permit remains unchanged. Front lights are required for safety of cyclists as the operational hours are not restricted to day light timings.
2	Bicycles	Kindly relax the requirement for bicycles to be able to last for upto 5 years. Request to amend this requirement to "3 years or more"	The condition has been amended to state that the bicycles shall last for 3 years. However, defunct cycles and/or part of the system shall be removed from public space by the operator. - Please check the amended application document
3	Bicycles	Requirement for visibility of the light from the sides of the bicycles to be relaxed	Visibility of cycles on public roads is important for safety. The conditions of the permit remains unchanged.
4	Bicycles	Request relaxation on requirement of red flash light and confirm that red reflector must alone suffice	The conditions of the permit remains unchanged.
5	Bicycles	Request relaxation on - " Lights must turn on automatically and stay on while a trip is being made, whether the user is in motion or stopped"	The condition has been amended "The light must turn on automatically and stay on while a trip is being made"- Please check the amended application document
6	Bicycles	Request relaxation on -"When stopped, light must stay on for 120 seconds "	The condition has been amended.- Please check the amended application document
7	Bicycles	Request change of requirement on "real time location data" to "near-real time location data"	The condition has been amended. The "near real time" has been defined as 15 minutes- Please check the amended application document
8	Bicycles/ SLAs	Request relaxation on - " At a minimum, the density of bicycles in the designated service area shall not fall below at least three bicycles per sq. km for more than 10 consecutive minutes between the hours of 6:00 am and 10:00 pm seven days a week"  the requirement needs to be established based on actual adoption studies at a later stage based on tangible insights on demand availability in every 1sqkm cluster for a considerable period of time and it exceeding the combined supply of all operators in that cluster. This requirement otherwise will disincentivize operators to achieve optimum deployment driven by actual demand and drive adoption	This condition has been amended. The SLAs have been made recommendatory
9	Cabinet GO	Please make explicit the Cabinet of Minister's decision on enabling a multi-player PBS system in Bengaluru	NA
10	Central control system	DULT shall develop a central monitoring and tracking system to track and regulate the operators; monitor SLAs etc. (We can assist DULT in integrating all operators and establish a central control system)	NA. This suggestion cannot be accommodated at this point.
11	Data	Operators can submit monthly report with consolidated data instead of real-time access	The condition has been amended. DULT requires "near real time" defined as 15 minutes. However DULT welcomes submission of structured monthly reports can also be submitted- Please check the amended application document
12	Data	Data sharing can be consulted further in a focus group. Worried about safety of confidential data	
13	Data	Request the requirement to be changed from "real time location data" to "near-real time location data" and reduce burden on the infrastructure and availability of bike (e.g. battery getting drained due to real-time data communication)	
14	Dispute Resolution	request the the dispute resolution to be further allowed to be referred to a independent arbitrator, jointly nominated by the DULT and Operator or by their authorised representatives	The conditions of the permit remains unchanged.
15	Enforcement	Parking hubs to strictly enforced and unauthorised usage prevented	Permittees are expected to report any unlawful use of parking hubs to the Bengaluru Traffic Police/BBMP/DULT and action will be taken as per the prevailing law
16	Fare	Impose a min and max fare in order to avoid a monopolistic situation where one operator will charge lower than others till all competition is extinguished and then increase the charge.	The conditions of the permit remains unchanged.
17	Fare	Set upper and lower fare limits	

18	Hours of operation	Hours of operation can start with 12 hours instead of 16	The conditions of the permit remains unchanged.
19	Infrastructure	DULT should share its infrastructure plan including design and timelines for PBS operators to roll out accordingly	Will be shared shortly and put up on DULT website.
20	Number of Bicycles	Cap the maximum number of bicycles that are to be operated within the DULT specified areas	The conditions of the permit remains unchanged.
21	Number of Bicycles	Set upper and lower limits of bicycles.	The condition has been amended. A lower limit of 500 bicycles shall be mandated per permittee.
22	Number of Bicycles	Please define availability as referred in the condition on "100% of the fleet permitted for operations should be available at any given point of time" given: a) the parking hubs are limited space (per Hub) and in limited numbers made accessible to users from multiple operators at any given time and b) the possibility of users leaving the bike at places outside of parking hubs and related lead time that may be required to recover these bikes The condition of availability especially when there is little precedent of PBS adoption in the city may be relaxed during the initial period of 10 months	The conditions of the permit remain unchanged. We only require 100% of the fleet that was declared for operations and calculating permit fee. Apart from these, the operators may declare number of stand-by bikes
23	Parking hubs	All parking zones should be open and accessible to all PBS operators	The condition has been amended. All permittees may use any DULT PBS Parking Hub within the city. Annual permit fee of Rs100/Bicycle will be paid to Authority. In lieu levying penalty periodically based on SLAs, the operator performance shall be assessed during the year and the permit renewal fee shall be linked to performance in the previous year.
24	Parking hubs	Hubs should be designed to withstand weather conditions	NA
25	Parking hubs	CCTV surveillance to be installed as part of parking hubs	NA
26	Parking hubs	Penalty on operators if they misuse the space or obstruct other operators	This is construed as vandalism and permittee would be required to report to police lawfully.
27	Performance Guarantee	Request this requirement to be dropped and instead a single fee of not more than 10 rs per bike per year be collected as fees from the operator to availing the permit. This would help reduce the cost of enabling the service to the citizens of bangalore	The condition has been amended. All permittees may use any DULT PBS Parking Hub within the city. Annual permit fee of Rs100/Bicycle will be paid to Authority. In lieu levying penalty periodically based on SLAs, the operator performance shall be assessed during the year and the permit renewal fee shall be linked to performance in the previous year.
28	Permit fee	Parking zones to be available at no cost to permittees, instead of nominal fee of Rs 10/bicycle/year (Kolkata model) to be charged depending on the number of bicycles they bring in	
29	Permit fee	permit fee should be proportional to number of bicycles instead parking hubs	
30	Permit fee	fee should be linked to number of cycles instead of parking hubs; Fixed fee for infrastructure development per annum	
31	Permit fee	Fee associated with parking hubs must be enforced only after operators reach a certain level of operations	
32	Permit Revocation (Ref- The Permittee agrees to surrender such permit in accordance with	Request the same be modified to "The Permittee agrees to surrender such permit in accordance with the instructions in the notice of revocation. In the event that DULT revokes a permit, permittee shall remove the bicycles from the parking hubs within 15 (fifteen) business days from the date of the notice of revocation."	The condition has been amended. The permittee shall be required to remove the bicycles from the parking hubs within 7 business days (as per government of Karnataka) from the date of issue of revocation notice.
33	Permit Revocation (Ref-The DULT reserves the right to revoke a Bicycle Share Program Permit at any time upon	Request the same be modified to "The DULT reserves the right to revoke a Bicycle Share Program Permit at any time with a due cause upon written notice of revocation sent to both the Permittee's mailing and email addresses listed on the Permittee's Application submitted to DULT, after providing the operator with an opportunity to resolve the cause and take corrective measures within fifteen days of receiving a show cause notice"	The condition has been amended
34	Permit- Documents to be submitted	Min 3 years of audited accounts statements required, however many operators are less than 3 years old	The conditions of the permit remain unchanged.
35	Permit- Documents to be submitted	Parking lot selection as part of permit process restricts the operator participation	The condition has been amended and permit fee has been linked to the number of bicycles. However the permittee must declare their intended area of operation
36	Permit- Documents to be submitted	Compliance certifications should be allowed to be submitted after signing of Mou up till launch of operations	Conditional permission can be provided
37	Permit- Documents to be submitted	The 3 years audited account statement is not applicable for company incorporated in the current financial year. Kindly confirm	The conditions of the permit remain unchanged.
38	Permit- Documents to be submitted	Part C in the document does not mention any details about insurance (coverage are, documents). Request to provide information on the proof of insurance for 1) Areas of insurance to be covered 2) Proof documents required	Please refer to the amended Permit Application document

39	Permit- Documents to be submitted	1. Kindly confirm the test result in the form of a certificate issued by the concerned authority or their authorised agencies shall suffice. 2. Going by standard timelines for certifications (both ISO 4210 and IS 10613), operator would not be able to produce the bicycle test results in time to apply for the bicycle sharing permit. Could the test results on Bicycles be submitted by the operator before the launch of the operations? Additionally, operator could submit an undertaking on the submission of the required document at the time of application for the permit. Kindly confirm	Conditional permission can be provided. However the operator shall provide an undertaking for the same.
40	Permit- Documents to be submitted	request the size of fleet and planned fleet expansion be allowed to be indicative while actuals shall be based on uptake of services and based on the the scale of parking infrastructure being made available	The permittee can increase the fleet size, however, this shall be enacted by suitably revising the permit.
41	Permit- Documents to be submitted	kindly confirm that operators can apply for all parking hubs, provided/committed by DULT a) at the time of issuance of permit and b) even later.	Refer amended document. All permittees may use any DULT PBS parking hubs
42	Permit- Documents to be submitted	kindly clarify that the strategy to manage damaged decrepit bicycles referred here covers bicycles and other PBS infrastructure components, as deployed by the operator	The strategy document shall cover the operators plan to remove decrepit bicycles and any other PBS components the permittee brings into the system (like redistribution vehicles, etc)
43	Permit- Documents to be submitted	Relaxation on operators required to identify parking hubs at the time of submitting the application for permit. Operators who apply for the permit would be applying for all the parking hubs and would pay for the hubs based on the number of cycles each operator deploys on road as against applying for specific parking hubs in the city	The condition has been amended and permit fee has been linked to the number of bicycles. However the permittee must declare their intended area of operation
44	SLAs	SLA "3 cycles for every 100 residents or about 3 lakh cycles in the city in aggregate" not relevant and enforceable at the individual permittee level and hence request it to be dropped	The SLA section has been amended to make them recommendatory for the guidance of the operator
45	SLAs	Unless there is a demand guarantee, the SLA "3 or more trips per cycle per day or about 7.5 lakh PBS cycle trips per day." may not be feasible for enforcement. Request this SLA to be dropped.  Given the business model driving the permit system naturally incentivises operator to seek/generate more trips to be sustainable, the proposed SLA is redundant. Instead a performance based permits/renewals system be considered as incentive for operators to meet this objective and enable more marketing effort from them to drive increased adoption	
46	SLAs	SLA "The users should be able to access bicycles at a maximum walking distance of 250-500m from any point in the city" is attributable to DULT and not operator as it depends on parking hubs being made available.	
47	System	A multi-operator model may result in problems of overload of bicycles	The conditions of the permit remain unchanged.
48	System	A consortium of atleast 3 members should be allowed	The conditions of the permit remain unchanged.
49	System	Branding must be allowed on bicycles and parking hubs	The conditions of the permit remain unchanged. (The operator shall have no rights for branding on the parking hubs.)
50	System	Seattle model is an experiment	NA
51	System	1. Kindly confirm that the permit application is for seeking permission to operate in the city covered within BBMP limits in general and is not confined to seeking access to parking hubs provisioned by DULT. 2. Kindly confirm that any bicycle sharing operator shall require a permit to offer bicyclesharing services in the BBMP limits of Bangalore 3. What is the implication for any operator who is operating within the BBMP limits without a formal permit from DULT.	The area currently chosen for providing infrastructure and starting PBS operations is based on the priority of the Government of Karnataka. However, DULT is open to operators operating in other areas within BBMP limits, but infrastructure readiness should be taken care of by the operator. DULT may support wherever feasible. In all instances permit from DULT shall be obtained.
52	System	All other relevant stakeholders - BBPM, BDA BMRC etc for this permit of Bicycle Sharing system are onboard with this permit and no other requests/permissions has to be taken by the operator. Kindly Confirm	DULT intends to ensure that all PBS operations within the BBMP limits of Bengaluru shall be carried out under this permit system
53	Control Centre Address	We wont be having a physical control centre at every location. Please change it to address of office.	If there are any issues with the operations, DULT would like to contact the control centre. If no such systems exists, address of the office shall be provided.
54	Audited Statement of Accounts	We are newly incorporated company and will be undergoing audit only later in the year. Kindly state that the company shall be registered in India or abroad.	The conditions of the permit remain unchanged. Same to be indicated in the application and audited statement of accounts can be submitted when prepared.
55	Proof of Insurance	No mention in Part C of insurance. Please accept our global insurance or let us obtain insurance as per agreed specification in due course, as practicable.	The conditions of the permit have been amended. Insurance clause has been added in Part C. The insurance shall cover the damages to property/people using the system and as well include third party coverage.
56	Cycle testing requirements	Any testing requires time. Allow us to get back to you with the test results while not making this a precondition for obtaining the permit.	An undertaking in this regard may be provided while applying for permit. Conditional permits can be provided.
57	Maintenance, cleaning and repair plan	This forms the core of our business and hence a trade secret.	The permittee shall provide a broad schedule of maintenance, cleaning, etc. As these cycles will be on public property
58	Cycle	To ensure that 100% of fleet to be available for operations will call for a large inventory of stand-by cycles and is statistically impossible to achieve. Please change to 70%.	The conditions of the permit remain unchanged. The permittee shall declare cycles that would be operated and cycles in stand-by in the application. Permit fee shall be charged on the cycles that are declared for operations.

59	Real-time data	We will be unable to provide real-time information due to concern over leakage of confidential data of our users and our operational strategy.	The conditions of the permit have been amended. Near real-time data (with not more than 15 min lag) shall be made available to DULT.
60	SLAs	We cannot be enforcers. We do encourage good customer behavior.	The conditions of the permit remain unchanged.