



Board Report

File #: 2018-0051, File Type: Policy

Agenda Number: 5.

FINANCE, BUDGET AND AUDIT COMMITTEE

MARCH 14, 2018

AD HOC CUSTOMER EXPERIENCE COMMITTEE

MARCH 15, 2018

**SUBJECT: TRANSFER ON 2ND BOARDING CUSTOMER
READINESS EFFORTS**

ACTION: APPROVE RECOMMENDATION

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to:

- A. REPLACE Day Pass sales onboard bus with ability to purchase Stored Value and Metro base fare onboard bus;
- B. ELIMINATE tokens and transition to TAP;
- C. IMPLEMENT a consistent \$2 fee for TAP cards system-wide; and
- D. FIND that the proposed change in adding Stored Value sales aboard buses results in a Disparate Impact (See Attachment D) but there is substantial legitimate justification for the proposed change and there are no alternatives that would have a less disparate impact on minority riders.

ISSUE

Onboard bus TAP Day Pass purchases have declined by over 85% since October, 2011. In comparison, Stored Value fare payments are growing and are expected to increase significantly once Transfer on 2nd Boarding is implemented. With approval, onboard Day Pass sales will be replaced with the ability to purchase or reload TAP cards with either Stored Value or base fare at the farebox. This change will align internal efforts with customer demand and make it easier for customers to purchase fare and travel throughout LA County. Day Pass sales will continue to be available online at taptogo.net, by calling 866.TAPTOGO, at Metro Customer Centers, at TAP vending machines located at Metro rail, Silver Line and Orange Line stations, at El Monte Transit Center, at Patsaouras Bus Plaza, and at over 400 TAP vendor locations.

Title VI Analysis for Adding Stored Value Sales onboard Bus

According to the Title VI analysis for adding Stored Value sales aboard bus (See Attachment D), this fare change confers a benefit on a group that is less minority than all riders and that creates a disparate impact. There is no financial barrier to prevent other users from joining the ranks of Stored Value bus riders, and it is expected that this disparate impact will correct itself very quickly due to benefits that are available. There is no other fare structure or media change that could create this benefit and maintain current revenues. In order to proceed with the proposed action, the Board of Directors must pass a motion that there is a substantial legitimate justification for the proposed action, and that no other action having a lesser disparate impact would accomplish the objectives of the proposed action.

The popularity and added security of TAP cards and the elimination of the discounted fare for Metro tokens has caused tokens to become obsolete. At one time, a token was good for one ride at a discounted rate but now a token is worth the same as the regular base fare of \$1.75. Transitioning token customers to TAP will provide customers with faster and safer boardings. Customers will no longer have to search for tokens but will quickly touch their TAP cards to the farebox to board. Registered TAP cards can be replaced if lost or stolen.

The price of TAP cards vary depending on the purchase method. The TAP card cost is \$2 when purchased online, by phone, at a Metro Customer Center or at a retail vendor and \$1 if purchased at a TAP vending machine or on a Metro bus. The actual cost of a TAP card is about \$2 per card and includes producing the TAP card, and its handling and distribution. The discounted rate was introduced at a time to encourage the use of TAP and is no longer recommended. Making this cost to customers consistent across all point of sale locations will rectify inequities, improve customer understanding and encourage customers to retain and reuse their cards.

DISCUSSION

Transfer on 2nd Boarding was approved by the Board in June, 2015 (see Attachment A for Transfer on 2nd boarding Board Report) and is set to be implemented Spring 2018.

Transfer on 2nd Boarding refers to the approved regional interagency transfer policy that eliminates the need for paper transfers for customers transferring between agencies. Transfer fare will be automatically paid with a TAP card when boarding a second transit agency within 2.5 hours from the first boarding. Customers will benefit from faster boardings and will no longer need to carry exact change. TAP cards will be provided to support this improved method of interagency transfers.

1 Million Free TAP card Distribution

The Board approved 1 million free TAP card distribution will prepare customers for Transfer on 2nd Boarding. Additionally, it will also help customers during the transition of tokens to TAP as well as the

implementation of consistent \$2 TAP card cost. TAP staff is working on a distribution plan to ensure these free TAP cards are distributed strategically and efficiently. Distribution recipients include, 24 TAP partner agencies, over 400 TAP retail vendors, Social Service Agencies, Veterans Outreach groups, Metro Customer Relations and Community Relations staff, as well as a variety of Metro Service Planning projects that require TAP cards.

Replace Day Pass Purchases with Stored Value Onboard the Bus

Staff recommends replacing Day Pass sales onboard bus with Stored Value and base fare, (see ATTACHMENT B for onboard Day Pass sales). The findings from the Title VI analysis (see ATTACHMENT C for Title VI analysis for removing Day Pass sales onboard bus) conclude that there is no disparate impact on customers. The findings from the Title VI analysis on adding Stored Value does have a disparate impact because the group of riders who would benefit from the increased convenience of being able to add value to their TAP cards on buses is a significantly less minority when compared to Metro's overall ridership (see ATTACHMENT D for Title VI analysis for adding Stored Value on bus). Day Pass sales will continue to be available online at taptogo.net, by calling 866.TAPTOGO, at Metro Customer Centers, at TAP vending machines located at Metro rail, Silver Line and Orange Line stations, at El Monte Transit Center, at Patsaouras Bus Plaza, and at over 400 TAP vendor locations.

Token Transition to TAP

Staff recommends eliminating Metro tokens as a payment option because they are obsolete due to TAP technology. As token use continues to decline (see ATTACHMENT E for token sale analysis) the TAP card is proven to be a viable, cost effective replacement that enables simpler, safer and automatic farebox collection. A Title VI evaluation of the proposed action found no Disparate Impact as the minority share of token users is not significantly different from the minority share of TAP card users (see ATTACHMENT F for Title VI evaluation for the discontinuation of tokens). Additionally, tokens are no longer cheaper than the base fare, so there is no customer benefit to this method of fare payment. The proposed efforts help to ensure broad availability of TAP media in lieu of tokens, and the de minimis cost due to its 10 year lifespan of the TAP card substantially mitigates this impact.

The implementation plan for phasing out Metro tokens will take place over 18 months. The first 2 months will be dedicated to a customer friendly campaign notifying patrons of final token sale and use dates, and how to transition to TAP. During the third month, Metro token sales will end. However, tokens will be accepted for at least one year. This length of time ensures that customers can utilize their existing tokens and obtain a TAP card. Prior to termination of token sales, TAP will begin distribution of (Board approved) 1 million free TAP cards. Additionally, a special token replacement plan will be implemented for social service agencies and other heavily token-reliant programs.

TAP Card Price Consistency (\$2 everywhere)

Staff recommends that the cost of TAP cards be consistent by making them \$2 across all purchasing platforms (see TABLE 1). There will be an increase of \$1 to customers who purchase TAP cards

onboard the bus and at TAP vending machines located at rail and some bus stations. The extra cost of the TAP card is amortized over its life of about 10 years making the card cost de minimis (see ATTACHMENT G for Title VI evaluation for equalizing TAP card costs). If approved, this card cost consistency will be implemented no later than Summer 2018 following a six week customer facing campaign.

Table 1

	Taptogo.net	866.TAPTOGO	Metro Customer Center	TAP Vendors	TAP Vending Machines	Metro Bus
Current	\$2	\$2	\$2	\$2	\$1	\$1
Proposed	\$2	\$2	\$2	\$2	\$2	\$2

Notice of Public Hearing

Pursuant to Metro's Administrative Code Section 2-50-025, the notice for this public hearing was provided to the general public as follows:

- Via Metro's website, metro.net, on a rotating banner
- Via the public hearing landing page, information on proposed recommendations including the notice of public hearing (See Attachment H) and frequently asked questions (See Attachment I)
- Via social media (Facebook and Twitter posts)
- Via posts on The Source discussing proposed recommendations
- Via e-blasts to Metro general information and key stakeholders e-mail lists
- Via printed legal notice of public hearing, published 30 days before the hearing in the following periodicals:

Asian Journal (LA), CA
 Daily News Los Angeles, CA
 LA Opinion, CA
 Panorama, CA
 Rafu Shimpō, CA
 The Korea Times, CA
 World Journal (Chinese Daily News), CA

- Via Metro Briefs as an ad item
- Via a "Take One" brochure onboard Metro buses and trains in 10 Title VI languages
- Messages on hold on 323.GOMETRO

Additional outreach included presentations to the following groups:

- Community Relations All Staff Meeting- 9/22/2017
- Citizen's Advisory Council- 10/25/2017
- Bus Operator Subcommittee- 12/5/2017
- Regional Service Council- 12/13/2017

For a summary of the public hearing results, see Attachment J.

Additional Efforts

Efforts are in progress to increase TAP card accessibility and to ensure TAP operator readiness for implementation of Transfer on 2nd boarding. TAP vendor recruitment efforts have resulted in over 400 vendor locations including 35 Los Angeles County Library locations. TAP plans to install an additional 52 Los Angeles County Library locations within the next year along with a 16 vendor pilot with 7-Eleven. Other efforts include distributing (Board-approved) 1 million free TAP cards and providing technical, and customer communications support to 24 TAP partner agencies.

...Determination_Of_Safety_Impact

DETERMINATION OF SAFETY IMPACT

Reducing the use of cash and increasing TAP use will enhance safety by speeding up boardings. TAP also provides registered cardholders with the benefit of Balance Protection to safeguard their TAP purchase against loss or theft.

FINANCIAL IMPACT

The proposed recommendations are within the limits of FY18 adopted budget. No additional funds are required.

ALTERNATIVES CONSIDERED

The Board could choose not to approve any of the aforementioned recommendations, however this action would not be recommended or consistent with the Board approved Transfer on 2nd Boarding mitigation strategies.

NEXT STEPS

Upon Board approval, staff will execute the following internal and external customer readiness efforts to support seamless implementation of Transfer on 2nd Boarding and fare collection efficiencies (see Attachment K for implementation timeline). Additionally, staff will work with appropriate Metro departments to implement incentives and rewards for customers who pay fare using a TAP card.

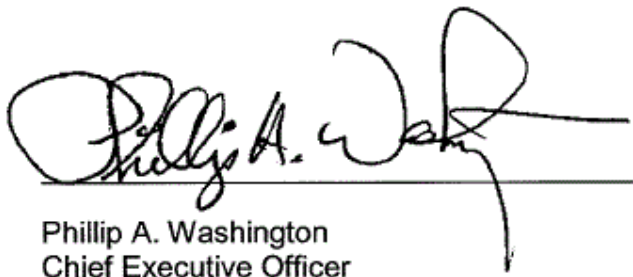
ATTACHMENTS

Attachment A - Transfer on 2nd Boarding Board Report

Attachment B - Decline of Onboard Day Pass Sales
Attachment C - Title VI analysis for removing Day Pass sales onboard bus
Attachment D - Title VI analysis for adding Stored Value on bus
Attachment E - Token sale analysis
Attachment F - Title VI Evaluation of Discontinued Tokens
Attachment G - Title VI Evaluation for \$2 TAP card pricing
Attachment H - Notice of Public Hearing
Attachment I - Frequently Asked Questions
Attachment J - Results of Public Hearing Summary
Attachment K - Implementation Timeline

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Board Report

File #:2015-0449

FINANCE, BUDGET AND AUDIT COMMITTEE
JUNE 17, 2015

SUBJECT: REGIONAL INTERAGENCY TRANSFER (IAT) POLICY

ACTION: APPROVE RECOMMENDATIONS

RECOMMENDATIONS

- A. Adopt the proposed change to the Policy on Use of Interagency Transfers as described in Attachment A.
- B. Adopt finding that the proposed policy change results in a Disparate Impact but there is substantial legitimate justification for the proposed change and there are no alternatives that would have a less disparate impact on minority riders.
- C. Adopt recommendation to distribute up to 1 million TAP cards free to bus riders purchasing transfers in advance of the effective date of the policy to address the underlying cause of the Disparate Impact finding (current TAP card possession).

ISSUE

As of May 2015, the last of the County's transit providers that participate in a regional fare program - EZ transit pass or Inter-Agency Transfers (IATs) - are on TAP. The region is now poised to fully realize the seamless travel across the County envisioned when the TAP program was launched in 2002, improving customer convenience and improving boarding times.

The proposed Policy on the Use of Inter-Agency Transfers (Attachment A) makes the following changes to the current policy by:

- 1) eliminating the paper inter-agency transfer by requiring all transfers to be made with a TAP card;
- 2) paying the transfer fare upon second, rather than first, boarding;
- 3) extending the inter-agency transfer window from 2 to 2 ½ hours; and,
- 4) providing for a single inter-agency transfer within the transfer window.

The new policy would not change the transfer price charged by each transit operator; transfer fares

would still be a local fare policy decision. Further, the new policy would not require change to intra-agency (i.e., within system) transfer policies like those at Metro, LADOT, Culver City BusLines, or Norwalk Transit, but would be integrated to work seamlessly with local TAP transfer policies on an operator-by-operator basis.

DISCUSSION

As the region has migrated to a TAP-based fare collection system over the last decade, IAT policy has presented many challenges because not all IAT-participating operators were on TAP. Operators with TAP capability had to consider the TAP capabilities or lack thereof when providing IATs to their customers. This resulted in the hybrid IAT program that we have today:

- Paper transfers are used for cash-paying customers transferring from bus to bus;
- TAP loaded transfers are used for customers who know they are transferring between TAP-enabled operators. To assist customers who may not know, most agencies load TAP transfers and continue to provide paper IATs;
- TVM-issued paper transfers are issued to customers transferring from Metro Rail to non-TAP operators;
- Limited use TAP “polka dot” transfers are issued to cash-paying customers transferring to Metro Rail or TAP customers transferring to Metro Rail from non-TAP operators.

These transfer accommodations have been difficult to manage for operators and difficult to use for customers. Now that all of the IAT-participating agencies are on TAP, the complexity of the IAT program can be simplified to the mutual benefit of both customers and operators. The policy change would provide an automatic transfer to customers when an eligible transfer boarding is made.

Regional Readiness

Several operators have already taken steps to harness the benefits the TAP system provides for transfer activity. Antelope Valley Transit and Santa Clarita Transit both eliminated paper transfers from their systems in recent years, requiring all customers who wish to transfer to another operator do so with their TAP cards. LADOT began the implementation of internal transfers on TAP with their conversion to the TAP program in 2013. Most recently, Metro implemented it’s own Board-approved internal transfer policy with the two hours of free transfers on TAP as part of the September 2014 fare change.

Beginning with the TAP conversion of Long Beach Transit in April 2014, 14 additional operators have been added to the TAP system bringing the total to 24 TAP enabled operators in the County (Attachment B). As the most recent 14 agencies have prepared for TAP transition over the last year, the region has been discussing the proposed changes to IAT policy through a number of forums including the General Managers’ group, Bus Operators Subcommittee (BOS), and Local Transit Systems Subcommittee (LTSS). Unanimous approval of the proposed policy was achieved by the

General Managers on May 13th, and the BOS on May 19th. Additionally, the policy proposal will be presented to the Citizens Advisory Committee on June 24th.

Should the policy be approved by the Board, a Working Group comprised of operator representatives together with TAP staff will oversee the technical and marketing efforts necessary for implementation.

Policy Changes

There are four significant changes proposed to the IAT policy.

1. Transfers within Los Angeles County would be allowed with a TAP card only. This would eliminate the paper transfers, Rail TVM paper transfers, and TAP "polka dot" transfers currently in use. This would require all base fares whether single ride fares or pass fares to be paid with a TAP card at which time eligibility for a transfer at the next boarding would be encoded on the TAP card. Transfers would not be available for cash-paying customers. However, there will be limited routes that may need to maintain paper transfers for transfers to operators outside Los Angeles County. These routes will be handled on a case-by-case basis.
2. Transfer fare would be deducted when making the second boarding. The customer no longer has to determine need for the transfer as it will happen automatically if the boarding is transfer eligible. Today, the customer requests a transfer on the first vehicle, is provided with a paper transfer, and the paper transfer is provided to the driver of the second vehicle. Under the proposal, the customer would simply tap for both boardings - a base fare would be deducted on the first vehicle and a transfer fare would be deducted on the second vehicle. Revenues are expected to remain unchanged as a result of the policy change but will now be collected on different legs of the trip.
3. The transfer window would be extended to 2.5 hours from the current 2 hour window. The extension of the transfer window was warranted due to increasing traffic congestion and the distance of some routes, particularly those from the Antelope Valley.
4. The policy would provide for a single IAT per base fare boarding. Today, it is each operator's discretion to issue another IAT when a customer boards with an IAT. Most operators, however, do not sell an IAT when presented with an IAT for boarding. The proposed policy would standardize this practice across the region.

Customer Benefits

The benefits to the customer of the proposed policy change include:

- *Speeding up boardings* - Under the new policy, a customer would not need to communicate with the driver to purchase an IAT. The transfer would happen automatically upon making the transfer boarding, ensuring the customer receives the transfer to which they are entitled, and speeding up boardings for all customers.

- *Eliminating necessity to carry exact change* - Restricting IATs to TAP cards only would eliminate the customer's need to carry exact change to purchase a transfer. Instead, riders would add cash to their TAP card. TAP cards can be registered for balance protection, allowing the TAP card balance to be restored should the card be lost or stolen (subject to a \$5 fee).
- *Customer ease of use* - A customer will no longer have to consider all legs of a continuous transit trip when determining when and what transfer to buy at any point along that trip. For example, a Metro customer today will automatically receive a transfer to another Metro route but has to know when he/she is transferring outside of Metro and that an IAT must be purchased. If the IAT is purchased before the Metro transfers are completed, the customer will lose the ability to transfer within Metro. Further, a customer transferring between operators would not need to know the exact cost of the transfer for each operator; the TAP system would recognize the valid transfer boarding and automatically deduct the best fare from the stored value balance.

Operator Benefits

The benefits to regional transit operators include:

- *Faster boarding time* - Under the new structure, a customer will not need to request a specific transaction for the transfer. This new policy would remove the necessity for the customer to communicate with the driver, which will expedite the boarding process and decrease dwell time, therefore increasing efficiency.
- *Encouraging the use of TAP* - The restriction of IATs to TAP cards is intended to add to recent efforts to increase TAP utilization. The new fare structure implemented in September 2014 added two hours of free transfers for customers paying the base fare on a TAP card. Prior to the 2014 fare changes, Metro did not offer intra-agency transfers, which meant that customers had to pay for each boarding. Additionally, the proposed policy change is consistent with the gating of Metro Rail which required all Rail boardings to be made with TAP cards. The proposed change to IATs would restrict all transfers to a TAP card, further increasing the TAP share of overall fare media usage which is 80% TAP for Metro. When customers use TAP, the region's operators can collect more data about when, where, and how the system is being used. This additional data makes for more well-informed decision making with regard to fare policy, transit routes, and scheduling.
- *Reduction of fraud* - Proof of payment for IATs is currently provided to customers in the form of paper transfers. This presents an opportunity for fraud, as paper transfers are relatively easy for passengers to resell or reproduce. Restricting the use of IATs to TAP cards links the original fare and the transfer to the same fare media, and the system would validate base fare

payment before authorizing the transfer. In addition, restricting IATs to TAP cards would eliminate the monetary incentive to resell the transfers since the TAP card itself costs \$1 to \$2.

- *Directly collected IAT revenues* - Under the current IAT structure, the transfer must be purchased upon the first boarding, which means that the agency providing the service for the original boarding collects both the base fare and the IAT fare. The proposed IAT policy would create a new system where the IAT fare would be automatically deducted upon the transfer boarding. This is a fairer and more appropriate fare payment, since the agency providing the transfer service would directly collect the IAT revenue.

Title VI

Metro conducted a Title VI evaluation (Attachment C) for the proposed policy change on behalf of the region. The County's population was divided into eight groups of riders defined by their proximity to a TAP sales location (within ¼ mile walking distance or not), their ability to load their TAP card on a transit vehicle, and whether they have a TAP card already in their possession. The Title VI evaluation found one group of the eight to be disparately impacted by the proposal - a group of 800,000 people who are constituents of Antelope Valley, Foothill Transit, Gardena, Montebello, and Torrance that currently do not have a TAP card, and are not within walking distance of a place to obtain one (though they could add value to it if they had one), and constitutes about 8.3% of all persons within walking distance of fixed route transit.

The proposed TAP-based IAT should be pursued given that more than 91% of the population would not be *Disparately Impacted* nor *Disproportionately Burdened* by the program. Customer convenience for those having to transfer would be improved with faster boarding times, and not having to carry added cash for transfer charges. It is in Metro's interest to pursue improved multi-operator coordination and the provision of seamless fare mechanisms for riders which the proposed program would accomplish. Given the significant investment in TAP, there is no alternative that would provide a consistent multi-operator transfer program without printed fare media than the proposed TAP-based transfer program. Approval of the policy by the Board constitutes that there is no cost-effective alternative to changing the IAT policy and it is in the regional transit operators' business interest to make the change despite the disparate impact finding. Metro and its regional TAP partners will reduce the negative effect of the policy change by conducting an extensive marketing and outreach campaign, including TAP card distribution. This campaign will address the underlying cause of the disparate impact finding.

TAP Sales Locations

Currently, customers can purchase and/or load passes or value to a TAP card from various sources:

- Metro TAP Vending Machines (TVMs) in all 80 rail stations, 17 Orange Line stations, and El Monte Station

- Operator Customer Service Centers
- 393 Third Party TAP Vendors
- Online at taptogo.net
- By telephone at 1-866-TAPTOGO

Additionally, TAP is actively working on expansion of the TAP sales network with the addition of new third party vendors and new TVM locations, and a new mobile app for TAP card sales. Current sales locations are being mapped against the fixed route network to target vendor expansion efforts to those areas with the least access to TAP sales locations.

Marketing and Training

Staff is working with the TAP member agencies on numerous strategies and tactics to ensure successful customer communications on the new transfer policy, including the dissemination of up to 1 million TAP cards in advance of policy implementation. Messaging will include important customer education tools, as well as highlight where TAP cards can be purchased and reloaded. These messages will be consistent throughout a traditional print and digital marketing campaign, with particular emphasis on major transfer rail stations and inter agency connectivity. The marketing committee will also implement an internal campaign to prepare all TAP agency bus and rail operators for the change. This will include in-person trainings, on-site division marketing and materials for operators to distribute to customers.

DETERMINATION OF SAFETY IMPACT

There is no discernable safety impact.

FINANCIAL IMPACT

Adoption and implementation of the proposed policy change would result in annual savings of \$685,000, beginning in FY17, for the printing and processing of the three different paper-based transfer media:

- \$400,000 of savings annually through the elimination of bus-issued paper transfers;
- \$15,000 in Metro Rail TVM-issued paper transfers; and,
- \$270,000 in the production of polka-dot one-time use TAP transfers used by municipal operator patrons transferring to Metro Rail.

Additionally, a decrease in the use of cash has undefined savings on equipment maintenance and cash counting.

There will be a one-time cost of approximately \$750,000 for up to 1 million TAP cards to be made available to the public in preparation for the policy change. The one-time expense is already part of

the FY16 TAP Operation budget.

The proposed policy does not change the cost of an IAT. As such, the proposed changes are not designed to and will not have a significant impact on fare revenues collected.

ALTERNATIVES CONSIDERED

The current Policy on Use of Interagency Transfers can remain in effect. This would require the continued use of paper inter-agency transfers for bus to bus transactions, TVM-issued paper transfers for rail-to-bus transfers, and polka dot TAP transfers for bus-to-rail transfers. However, this would not achieve the same benefits to the riding public. In addition it would not fulfill the objective of the region's transit providers to create a more seamless, coordinated transit system.

NEXT STEPS

If the policy is approved, Metro staff, together with regional TAP partners, will begin the technical efforts to program the policy change into the TAP system, and will initiate a thorough marketing and outreach effort to inform the public. The effective date of the policy change will be agreed upon by the Working Group and is estimated to be in approximately 6 to 9 months due to the time needed to program the TAP system, educate and train each agency's operators, and inform and prepare the public.

Additionally, Metro staff will assist TAP partners with presentation of the Fare Equity Analysis results to their respective Boards/Councils for approval per FTA guidelines.

ATTACHMENTS

Attachment A - Proposed Changes to the Policy on the Use of Inter-Agency Transfers

Attachment B - TAP-Participating Operators

Attachment C - Title VI Evaluation

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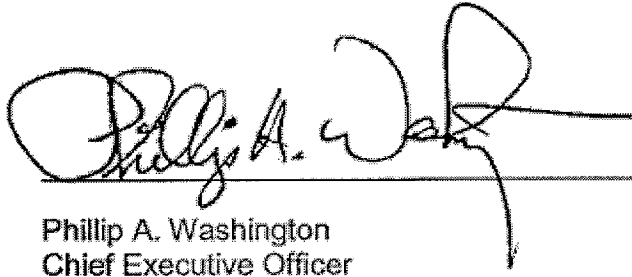
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Phillip A. Washington
Chief Executive Officer

**Proposed Changes to the
Policy on the Use of Inter-Agency Transfers**

In an effort to promote seamless travel for the public, and in response to state TDA law, included and eligible municipal operators and the LACTMA establish the following revised interagency transfer policy:

~~A transfer that a rider receives from one bus system or Metro Rail line will be accepted by other bus systems or Metro Rail lines for segments of a one-way continuous trip that the rider makes within a two-hour period on any one day. For systems having designated transfer points, the interagency transfer will only be accepted at these points.~~

A rider shall receive one transfer between bus systems or Metro Rail lines operated by different agencies within two and one-half hours of payment of a base fare. If the person is transferring to express or premium service, the operator will follow that system's policy about charging an additional fare for the express/premium service.

~~The rider may use the same transfer for all transfer segments, unless the receiving operator has a policy to collect transfers from boarding passengers. In that event, the bus operator will provide the passenger with a new interagency transfer upon payment of the interagency transfer fare. If the person is transferring to express or premium service, the accepting operator will follow that system's policy about charging an additional fare for the express/premium services. Fares for interagency transfers are determined by the issuing transit system.~~

Transfers shall be made available to customers as follows:

TAP cardholders shall automatically receive one transfer, if applicable, upon boarding their second bus or train within two and one-half hours. Fares for the TAP interagency transfer are determined by the accepting transit system.

TAP Enabled Operators

<u>Operator</u>	<u>TAP Fare Collection Devices</u>
Antelope Valley Transit Authority	Fareboxes
Baldwin Park Transit Lines	Bus Mobile Validators
BurbankBus	Bus Mobile Validators
Carson Circuit	Bus Mobile Validators
Compton Renaissance Transit	Bus Mobile Validators
Culver CityBus	Fareboxes
Foothill Transit	Fareboxes
GTrans (Gardena)	Fareboxes
Glendale BeeLine	Bus Mobile Validators
Huntington Park COMBI	Bus Mobile Validators
LA County	Bus Mobile Validators
LADOT	Driver Control Units/Light Validators
Los Angeles World Airports	Bus Mobile Validators
Long Beach Transit	Bus Mobile Validators
Metro	Fareboxes, Stand Alone Validators, Gates
Montebello Bus Lines	Fareboxes
Monterey Park Spirit Bus	Bus Mobile Validators
Norwalk Transit	Fareboxes
Pasadena Arts	Bus Mobile Validators
Palos Verdes Peninsula Transit Authority	Bus Mobile Validators
Beach Cities Transit (Redondo Beach)	Bus Mobile Validators
Santa Clarita Transit	Fareboxes & Driver Control Units/Light Validators
Big Blue Bus (Santa Monica)	Bus Mobile Validators
Torrance Transit	Fareboxes

**Title VI Evaluation
Replacement of Existing Interagency Transfers
With TAP-Based Method**

This is a Title VI evaluation of the replacement of current methods of providing Interagency Transfers (IATs) with a TAP-based method. The affected operators are those Los Angeles County fixed route service providers that receive some form of formula operating subsidy from the Los Angeles County Metropolitan Transportation Authority (Metro)(Table 1).

***Table 1
Los Angeles County
Formula Funded Fixed Route Operators***

Antelope Valley	Gardena	Norwalk
Beach Cities Transit	Long Beach	Santa Clarita
Culver City	Los Angeles DOT	Santa Monica
Foothill Transit	Metro	Torrance
	Montebello	

For this evaluation the Universe of potentially impacted persons is all persons within one-quarter mile of any bus stop served by one or more of the above operators, and/or within one-half mile of any rail station. Ethnic data for this population is obtained from the 2010 US Census, and Household Income data for this population is obtained from the 2006-2010 American Consumer Survey (ACS). Because the Census data is provided at the block group level, and the ACS data is at the tract level the size of the impacted population is slightly greater for the ACS data (block groups that are more than one-quarter mile from a bus stop would be excluded from the Census data, but could be included in the ACS data if the tract containing such block groups was within that one-quarter mile of a bus stop).

For reference purposes this evaluation will refer to the Ethnic population as the Title VI data, and the Household Income population will be referred to as the Environmental Justice data. The Title VI population consists of 9,648,798 persons of whom 6,826,725 are minorities (70.8%). The Environmental Justice population consists of 9,742,481 persons of whom 1,531,488 are living in households below the federally defined Poverty income levels (15.7%).

Evaluation Methodology

The Universe of potentially impacted persons has been defined as essentially all persons who can walk to fixed route transit. Under current methods any passenger

desiring an IAT may purchase it at the time that they board a bus, or at a rail station at the time that they purchase their rail ticket. In order to be unaffected by the introduction of TAP-based IAT's a passenger must still be within walking distance of the means to purchase the IAT before taking their transit ride. Otherwise, a person would be adversely affected by the new method.

The mechanics of the proposed IAT process require that the passenger have a TAP card with a cash purse holding sufficient value to purchase an IAT. Such a rider would pay their initial fare by whatever means they normally use (either a cash deduction from the TAP card purse, or the use of whatever pass is stored on the TAP card). When the transfer boarding occurs, the cost of the transfer would be debited from the TAP card purse.

The relevant factors for this evaluation are 1) does the rider have a TAP card, or not, and 2) can the rider add value to that TAP card to ensure the ability to pay for the trip. The ability to add value to a TAP card adds an additional level of complexity to this evaluation – some of the fixed route operators have the ability to add value to a TAP card on board a bus and some do not have this capability. In the latter instance, whether a rider remains unaffected by the proposed method will depend on whether or not they are within walking distance of an alternative means of adding value to the TAP card. The alternatives consist of rail and Orange Line stations which have TVM's capable of issuing and upgrading TAP cards, or customer service outlets which can sell and/or upgrade TAP cards (there are several hundred of these). The possible combinations of these factors and nature of rider impacts are shown in Table 2.

This evaluation assumes that having to purchase a TAP card is inconsequential because the \$1-\$2 cost of the card can be amortized over its multiple year validity. Therefore, the No TAP Card riders whose only potential adverse impact would be the need to buy a TAP card are considered to be Not Impacted as long as they are otherwise able to walk to a location where they can add value to the card.

As can be seen from Table 2 there are three scenarios that result in an adverse impact for riders so situated:

1. The rider has No TAP Card and adding value to the TAP purse on the bus has no value because they are not within walking distance of a location where they could obtain the TAP card itself;
2. The rider has a TAP Card but cannot add value to it anywhere; and
3. The rider has No Tap Card and cannot add value to it or buy one.

Table 2
Rider Impact Categorizations

	<u>TAP Card</u>	<u>No TAP Card</u>
Can Add Value Can Walk to Outlet	No Impact	No Impact
Can Add Value Cannot Walk to Outlet	No Impact	Adverse Impact
Cannot Add Value Can Walk to Outlet	No Impact	No Impact
Cannot Add Value Cannot Walk to Outlet	Adverse Impact	Adverse Impact

Results of Evaluation

The next step in this evaluation was to determine the number of persons associated with each Impact Category, and for the potential Adverse Impact categories, whether or not the resulting impacts were Disparate (disproportionately affecting minorities) or imposed a Disproportionate Burden (disproportionately impacted persons in Poverty).

Metro has defined a Disparate Impact as an adverse impact affecting a group having an absolute 5% greater minority share than the overall population (Universe) (in this instance, $70.8\% + 5\% = 75.8\%$ or greater) or a 20% greater share ($70.8\% \times 1.20 = 85.0\%$). This evaluation uses the lesser threshold of 75.8%. A Disproportionate Burden has been defined as an adverse impact affecting a group having an absolute 5% greater Poverty share ($15.7\% + 5\% = 20.7\%$), or a 20% greater Poverty share than the overall population (in this instance, greater than $15.7\% \times 1.20 = 18.8\%$ or greater). This evaluation uses the lesser share of 18.8%.

The first adversely impacted group consists of those riders who do not have a TAP card, but could add value to it if they did. This is the non-TAP card portion of the second group in Table 3. The minority share of this group (75.9%) exceeds the Disparate Impact threshold (75.8%) so this group is **Disparately Impacted**. The Poverty share (14.7%) is less than the threshold for Disproportionate Burden (18.8%) so there is no Environmental Justice consequence for this group.

Table 3

Intra Agency Transfer Tap Proposal
Title VI and Environmental Justice Analysis Results

Scenario	Sub Categories	Title VI		Environmental Justice	
		Total Population	Minority Population	% Minority	% Poverty
Existing Universe		9,648,798	6,826,725	70.8%	15.7%
Existing Conditions					
	Can add value	1,968,742	1,553,530	78.9%	20.9%
	Can walk to Tap Local				
	Can add value	2,874,232	2,181,275	75.9%	14.7%
	Can't walk to Tap Local				
	Can't add value	3,990,023	3,060,150	76.7%	19.8%
	Can walk to Tap Local				
	Can't add value	8,270,940	5,816,187	70.3%	16.1%
	Can't walk to Tap Local				

Notes

1. Title VI is performed at the census block group level using 2010 Census Data
2. Environmental Justice is performed at the census tract level using 2010 5 Year American Community Survey Data
3. Transit buses and stations where one can add value to the tap card - AVTA, Foothill, Gardena, Montebello, Torrance and Metro Orange Line and Rail
4. Transit buses where one can't add value to the tap card - Metro buses, Beach Cities, Culver City, Long Beach, LADOT, Norwalk, Santa Monica and SCVTA
5. Used quarter mile buffers for bus stops and half mile buffers for rail stations.

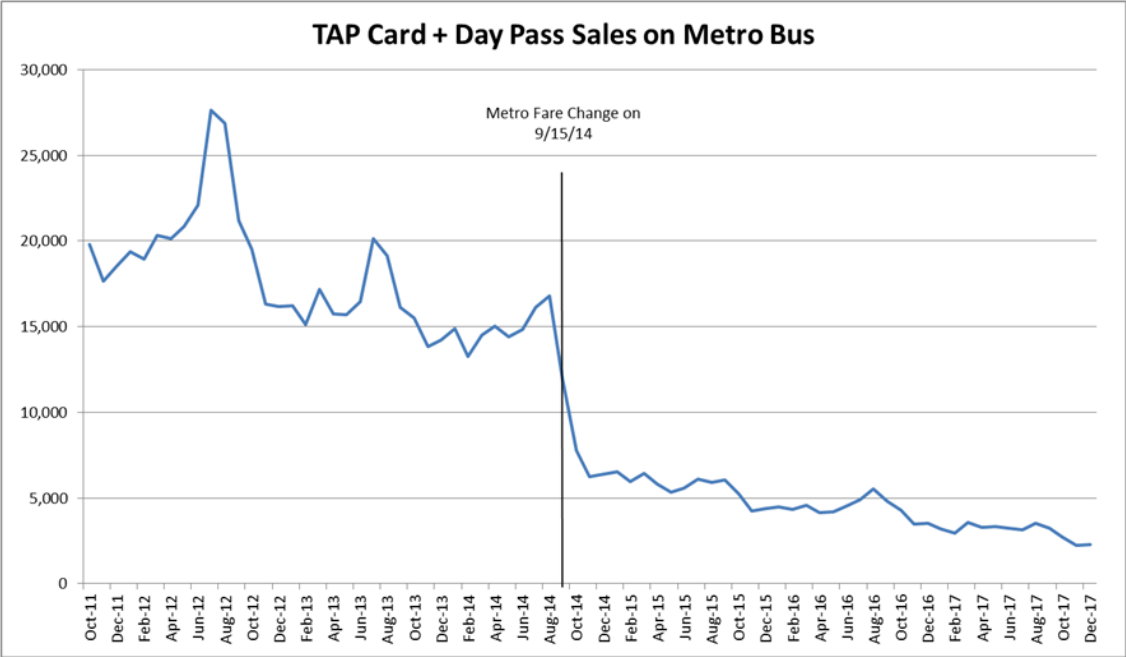
The remaining two adversely impacted groups comprise the totality of the fourth category in Table 3 (whether or not they have a TAP card, they have no way to add value to it). Both the minority share (70.3% compared with 75.8%) and the Poverty share (16.1% compared with 18.8%) are less than the thresholds for Disparate Impact and Disproportionate Burden, respectively, so there are no Title VI or Environmental Justice consequences for these groups.

Findings

The group of riders having no TAP card, and not within walking distance of a place to obtain one (though they could add value to it if they had one) was found to be **Disparately Impacted** by the proposed TAP-based IAT. The most recently processed Customer Satisfaction Survey indicates that about 72% of Metro riders have a TAP card (probably a higher percentage now as this data is over a year old). This yields a group of approximately 800,000 people who are constituents of Antelope Valley, Foothill Transit, Gardena, Montebello, and Torrance (those affording the opportunity to add value to the TAP purse at the trip origin). This group constitutes about 8.3% of all persons within walking distance of fixed route transit.

The proposed TAP-based IAT should be pursued given that more than 91% of the population would not be Disparately Impacted nor Disproportionately Burdened by the program. Customer convenience for those having to transfer would be improved with faster boarding times, and not having to carry added cash for transfer charges. It is clearly in Metro's interest to pursue improved multi-operator coordination and the provision of seamless fare mechanisms for riders which the proposed program would accomplish. Given the significant investment in TAP, there is no other cost-effective mechanism for providing a consistent multi-operator transfer program without printed fare media than the proposed TAP program.

Decline of Day Pass Sales on Bus



EVALUATION OF DISCONTINUED DAY PASS SALES ON BUSES

Federal Transit Administration (FTA) Circular 4702.1B provides guidance for the conduct of equity evaluations of proposed service and fare changes. A transit operator must have a locally adopted process for determining when public hearings, and the equity evaluations associated with such proposals, are required. Impacts to both minority and poverty level persons must be assessed, and there must be locally adopted standards for when differences between impacted persons and everyone else are significant.

Metro's Administrative Code contains these rules and definitions in Section 2-50. A public hearing and equity evaluation is required for any fare change. The difference between the minority/poverty shares of impacted riders and all others is deemed significant if either the absolute difference is 5% or greater, or the relative difference is 35% or more.

Proposal to be Evaluated

At the present time, Metro riders may purchase a Day Pass online at taptogo.net, by calling 866.TAPTOGO, at Metro Customer Centers, at TAP vending machines located at Metro rail, Silver Line and Orange Line stations, at El Monte Transit Center, at Patsaouras Bus Plaza, and at over 400 TAP vendor locations. The card costs \$2 except when purchased at a TVM or onboard bus. In the latter two instances, they cost \$1. Because TAP cards may be reused, and have an expected lifetime of ten years, the price difference for the differing sales outlets is considered de minimus.

Title VI Evaluation and Findings

The most current available ridership data was collected as part of the Spring 2016 Customer Satisfaction Survey. The relevant data provided by this survey includes method of payment, discount category, ethnicity, and poverty status. Day pass users were found to be 91.78% minority compared with 88.24% minorities among all users. This difference does not meet the threshold for a disparate impact using Metro's definitions

Environmental Justice Evaluation and Findings

The share of Day Pass users below the poverty level is 33.69% compared with 43.75% of all riders. This is a significant difference using Metro's current definitions, but there is no disproportionate burden imposed because the adversely impacted riders are significantly less poor than all riders.

ATTACHMENT D

EVALUATION OF ADDING TO TAP CARD STORED VALUE ON BUSES

Federal Transit Administration (FTA) Circular 4702.1B provides guidance for the conduct of equity evaluations of proposed service and fare changes. A transit operator must have a locally adopted process for determining when public hearings, and the equity evaluations associated with such proposals, are required. Impacts to both minority and poverty level persons must be assessed, and there must be locally adopted standards for when differences between impacted persons and everyone else are significant.

Metro's Administrative Code contains these rules and definitions in Section 2-50. A public hearing and equity evaluation is required for any fare change. The difference between the minority/poverty shares of impacted riders and all others is deemed significant if the absolute difference is either 5% or greater, or the relative difference is 35% or more.

Proposal to be Evaluated

At the present time, Metro riders may add Stored Value onto their TAP cards at TAP Vending Machines (TVM's) at Metro rail, Silver Line, El Monte Transit Center, Patsaouras Bus Plaza and Orange Line stations, at Metro Customer Centers, at more than 400 third party sales outlets, online at taptogo.net and by calling 866-TAPTOGO. The proposed action would permit patrons the same capability on buses.

Title VI Evaluation and Findings

The most current available ridership data was collected as part of the Spring 2016 Customer Satisfaction Survey. The relevant data provided by this survey includes method of payment, discount category, ethnicity, and poverty status. A comparison of minority representation among TAP Stored Value riders and all riders is provided in Table 1.

Table 1

	<u>Minority Share</u>	<u>Absolute Diff.</u>	<u>Relative Diff.</u>
TAP Stored Value			
Regular	77.52%	-10.72%	-12.15%
Elderly/Disabled	71.61%	-16.63%	-18.85%
Student (K-12)	89.95%	1.71%	1.94%
All Riders	88.24%		

Current TAP Stored Value users are less minority than all riders (except for Student riders, who represent only 4.63% of Stored Value users). This change confers a benefit on a group that is less minority than all riders and that creates a disparate impact. There is no financial barrier to prevent others users from joining the ranks of **Stored Value** bus riders, and it is expected this disparate impact will correct itself very quickly due to benefits that are available. There is no other fare structure or media change that could create this benefit and maintain current revenues.

In order to proceed with the proposed action the Board of Directors must pass a motion that there is a substantial legitimate justification for the proposed action, and that no other action having a lesser disparate impact would accomplish the objectives of the proposed action.

Environmental Justice Evaluation and Findings

An environmental justice evaluation of the proposed action considers the poverty status of impacted riders in comparison with all riders. The poverty representation of the impacted riders compared with all riders is provided in Table 2.

Table 2

	<u>Poverty Share</u>	<u>Absolute Diff.</u>	<u>Relative Diff.</u>
TAP Stored Value			
Regular	63.47%	19.72%	45.07%
Elderly/Disabled	50.50%	6.75%	15.43%
Student (K-12)	23.08%	-20.67%	-47.25%

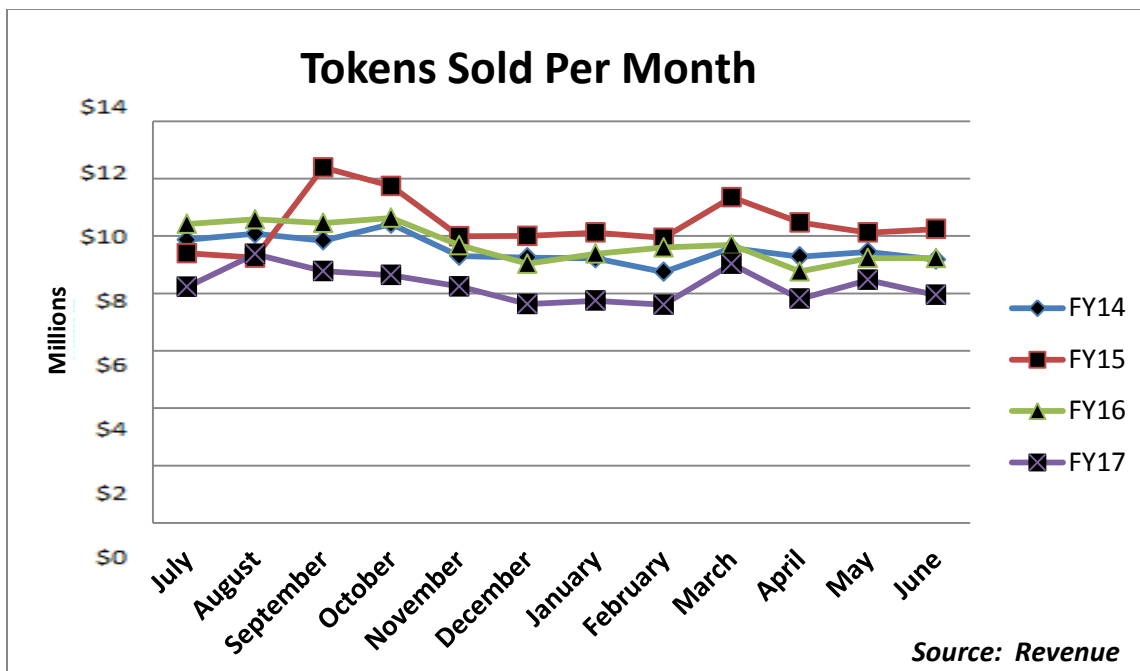
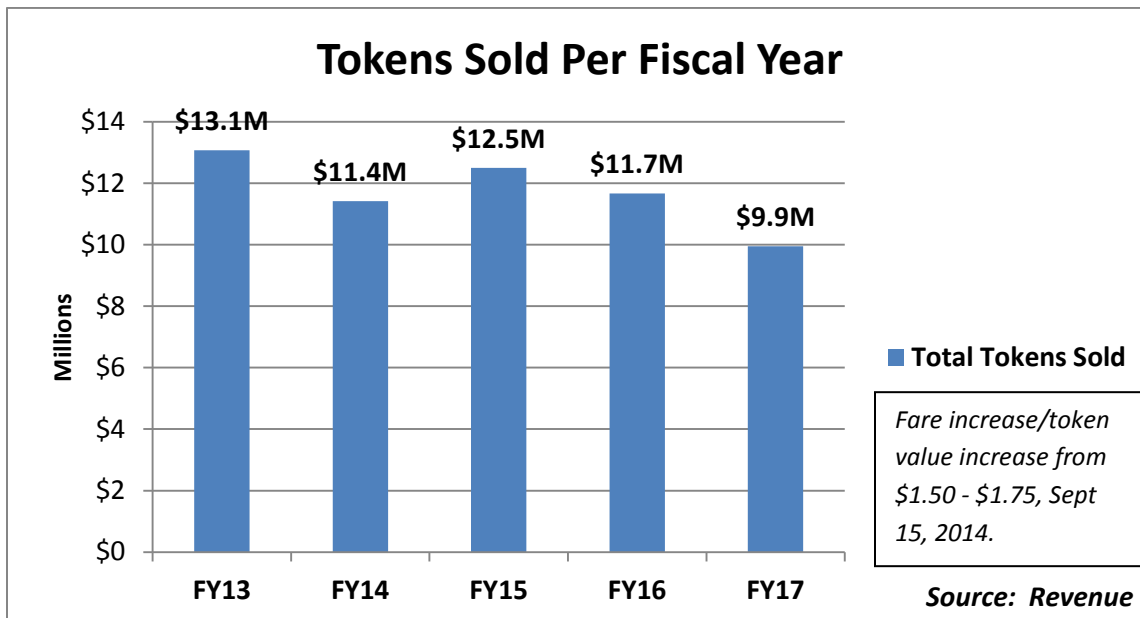
All Riders	43.75%
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The poverty representation of all subcategories of TAP Stored Value riders differs significantly from that of all riders. However, since the action is considered beneficial, there is no disproportionate burden.

Decline in Token Sales & Processing

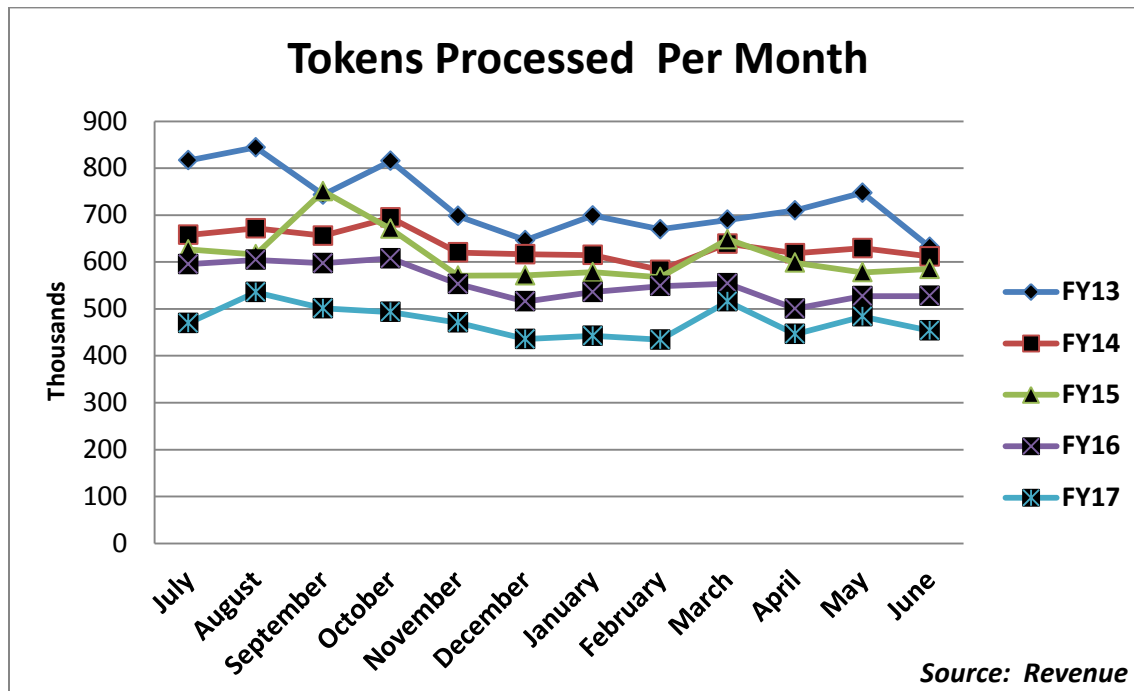
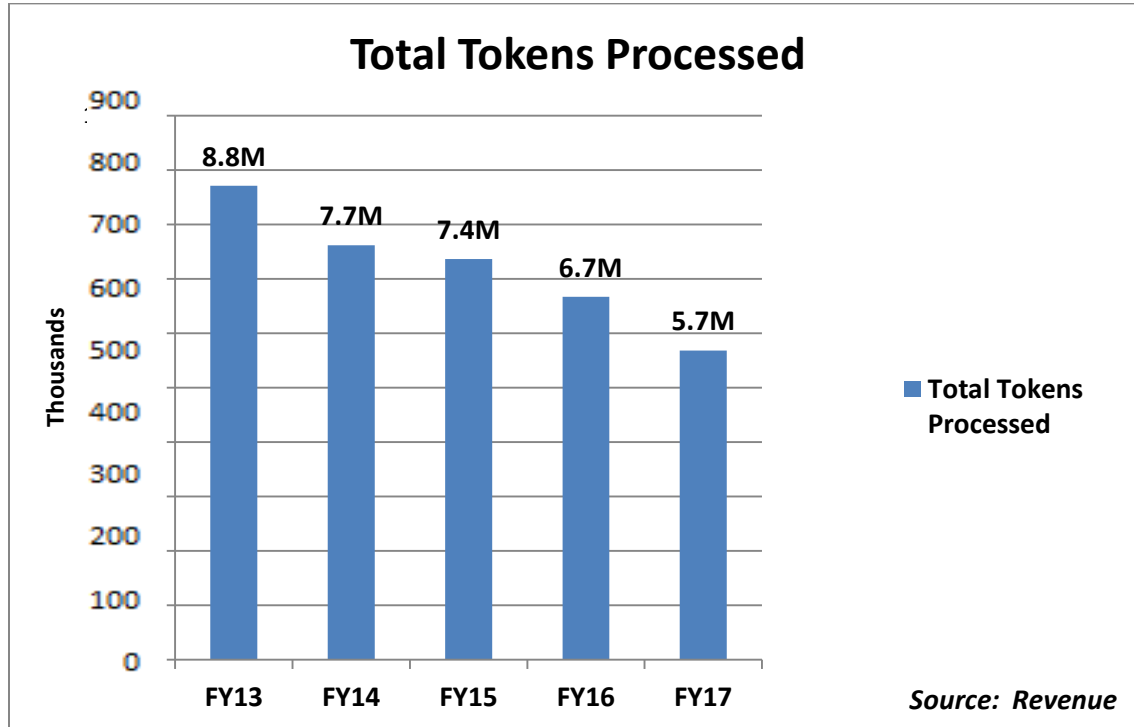
Token Sales

Token sales from 2013-2017 has decreased by an estimated **\$3.2M** or **24.4%** system-wide (bus and rail). Refer to the below charts for token sales.



Token Processed

Token processing from 2013-2017 has decreased by an estimated **3.1M** or **35.2%** system-wide (bus and rail). Refer to the below charts for processed token counts.



EVALUATION OF DISCONTINUED TOKENS

Federal Transit Administration (FTA) Circular 4702.1B provides guidance for the conduct of equity evaluations of proposed service and fare changes. A transit operator must have a locally adopted process for determining when public hearings, and the equity evaluations associated with such proposals, are required. Impacts to both minority and poverty level persons must be assessed, and there must be locally adopted standards for when differences between impacted persons and everyone else are significant.

Metro's Administrative Code contains these rules and definitions in Section 2-50. A public hearing and equity evaluation is required for any fare change. The difference between the minority/poverty shares of impacted riders and all others is deemed significant if either absolute difference is 5% or greater, or the relative difference is 35% or more.

Proposal to be Evaluated

At the present time, Metro riders may purchase Tokens in packages of 10 for \$17.50. Each token is good for one boarding on Metro and has a value equivalent to the Cash base fare of \$1.75. Tokens are also used as a means of funding transit travel for participants in Metro's Immediate Needs Program with each Token providing one boarding on Metro.

The proposed action would discontinue the availability of Tokens. Patrons who buy tokens would need to obtain or use a TAP card and add Stored Value to the card. TAP cards and the ability to add Stored Value to them are available at the same places where Tokens can be obtained, and are also available through Ticket Vending Machines (TVM's) meaning broader availability. In addition, if a TAP card with Stored Value is used to board Metro, then the patron is entitled to free Metro to Metro transfers for up to two and a half hours from the initial boarding – an added benefit. While the TAP card initially costs \$1 to \$2, depending on where it is purchased, its 10-year expected lifetime (it is reusable) means that the cost of the card is de minimus and not a factor for an equity analysis.

For those who receive Tokens through the Immediate Needs Program, there is a separate action being undertaken to replace that benefit with pre-loaded, stored value TAP cards. Thus, the benefit would be maintained using different media, and the added benefit of free transfers as described above would also be conferred. A separate Title VI evaluation of proposed changes to the Immediate Needs Program (as well as the Rider Relief Program) has been prepared.

Title VI Evaluation and Findings

The most current available ridership data was collected as part of the Fall 2016 Customer Satisfaction Survey. The relevant data provided by this survey includes method of payment, race, and poverty status. Comparative statistics for Token and TAP users are provided in Table 1.

Table 1

	<u>All Users</u>	<u>Token Users</u>	<u>Absolute Diff.</u>	<u>Relative Diff.</u>
Minority Share	91.4%	91.4%	0.0%	0.0%
Poverty Share	60.5%	74.0%	13.5%	22.3%

The minority shares of Token and TAP card users are not significantly different, so the proposed action would not have Disparate Impact on Token users. On the other hand, the share of Token users with poverty level incomes is significantly greater than for TAP card users. This creates a Disproportionate Burden on Token users from the proposed action. this impact is mitigated as the replacement media will have greater availability than Tokens, and also confer a greater benefit when used by virtue of the free Metro to Metro transfers provided.

EVALUATION OF EQUALIZING TAP CARD COSTS

Federal Transit Administration (FTA) Circular 4702.1B provides guidance for the conduct of equity evaluations of proposed service and fare changes. A transit operator must have a locally adopted process for determining when public hearings, and the equity evaluations associated with such proposals, are required. Impacts to both minority and poverty level persons must be assessed, and there must be locally adopted standards for when differences between impacted persons and everyone else are significant.

Metro's Administrative Code contains these rules and definitions in Section 2-50. A public hearing and equity evaluation is required for any fare change. The difference between the minority/poverty shares of impacted riders and all others is deemed significant if the absolute difference is either 5% or greater, or the relative difference is 35% or more.

Proposal to be Evaluated

Metro prepaid fare media is stored on reusable TAP cards. Stored Value media may be added to TAP cards for convenient payment of individual fares. Once purchased the TAP card should be retained by the rider as it may be reused continuously for up to 10 years.

At the present time TAP cards may be obtained online at taptogo.net, by calling 866.TAPTOGO, at Metro Customer Centers, at TAP vending machines located at Metro rail, Silver Line and Orange Line stations, at El Monte Transit Center, at Patsaouras Bus Plaza, and at over 400 TAP vendor locations and onboard buses (if purchasing a Day Pass). The cards cost \$2 except when purchased at a TVM or onboard a bus. In the latter two instances, they cost \$1.

The proposed action would equalize the cost of a TAP card at \$2 wherever purchased.

Evaluation and Findings

TAP cards are reusable with an expected life of 10 years. At \$2, amortized over 10 years, the cards cost less than 1.7 cents per month. This is considered de minimus and is therefore not subject to a equity analysis



NOTICE OF PUBLIC HEARING

Los Angeles County Metropolitan Transportation Authority

The Los Angeles County Metropolitan Transportation Authority will hold a public hearing on January 17, 2018 to receive community input on the **proposed customer readiness efforts surrounding Transfer on 2nd Boarding**, set for implementation Spring 2018. Details of the hearing date, time, and location are shown below.

PUBLIC HEARING SCHEDULE

1:00 PM
Metro Headquarters Building
January 17, 2018
Board Room
One Gateway Plaza
Los Angeles, CA 90012-2932

The upcoming public hearing is being held in conformance with federal public hearing requirements outlined in Section 5307 (d) 1 of Title 49 U.S.C., and public hearing guidelines adopted by Metro's Board of Directors in 1993, as amended.

Transfer on 2nd Boarding was approved by the board in June, 2015 and refers to the approved interagency transfer policy that eliminates the need for paper transfers for customers transferring between agencies. Transfer fare will be automatically paid with Stored Value on a TAP card when boarding a second transit agency within 2.5 hours from first boarding. Customers will benefit from faster boardings and will no longer need to carry exact change.

In order to prepare customers for Transfer on 2nd Boarding, the following efforts are recommended:

Replace Day Pass and Add Stored Value sales aboard Buses

Discontinuation of Day Pass sales will enable the sale of Stored Value. Replacing TAP Day Pass purchases with the ability to reload Stored Value will allow passengers to add fare immediately to their TAP card, which is necessary in preparation for transfer on 2nd boarding.

Transition Tokens to TAP

Phase out of Metro tokens as a payment option they are obsolete due to advances in TAP acceptance. The TAP card is a viable, cost effective replacement that enables simpler, safer and automatic farebox collection.

Implementation of a consistent \$2 TAP card price to customers across all purchase touch points

It is recommended that the cost of TAP cards be consistent by making them \$2 across all purchasing platforms. Costs of cards remain the same at TAP vendors, Metro Customer Centers and online. The card will go from \$1 to \$2 onboard buses and TAP vending machines. The extra cost of the TAP cards in vending machines and buses is negligible as amortized over its life of 10 years.

Additional details about these proposals will be available for public review after **December 1**. To obtain this information contact the address listed below, or visit your nearest Metro Customer Relations Center. Information can also be accessed at: www.metro.net

Note these proposals may be approved in whole or in part at a date following the public hearings. Approved changes may also include other alternatives derived from public comment. Interested members of the public are encouraged to attend the upcoming hearing and provide testimony on the fare proposals under consideration. Persons unable to attend the hearings may submit written testimony postmarked through midnight, January 17, the close of the public record. All written testimony should be addressed to:

Metro Customer Relations:

Attn: Transfer on 2nd Boarding Readiness
One Gateway Plaza, 99-PL-4
Los Angeles, CA 90012-2952

Comments can also be sent via e-mail with **“Transfer on 2nd Boarding Readiness”** as the subject to:

customerrelations@metro.net

Facsimile at: 213-922-6988

Upon request, foreign language translation, sign language interpretation, materials in alternative formats and other accommodations are available to the public for MTA-sponsored meetings and events. All requests for reasonable accommodations must be made at least three working days (72 hours) in advance of the scheduled meeting date. Please telephone (213) 922-4600 between 8 a.m. and 5 p.m., Monday through Friday.

Frequently Asked Questions

What is Transfer on 2nd Boarding?

Transfer on 2nd Boarding refers to the board-approved policy that eliminates the need for paper transfers for customers transferring between transit agencies. Instead of purchasing paper transfers, customers will need to load Stored Value onto their TAP card in order to transfer between agencies. Transfer fare will automatically be deducted from the Stored Value when boarding a second transit agency within 2.5 hours from the first boarding. Customers will benefit from faster boardings and will no longer need to carry exact change.

Why are these changes being proposed now?

These changes are being requested in order to enhance customer convenience and improve fare collection efficiencies by removing paper transfers from the system.

How will Transfer on 2nd Boarding Work?

Transfer on 2nd Boarding simplifies inter agency transfers. For example, a customer pays for their first boarding with a TAP card. Within 2.5 hours from that first boarding, the customer boards a different transit agency bus and taps their TAP card. The transfer fare will automatically be deducted from the TAP card's Stored Value. Customers must have Stored Value on their TAP card before boarding the 2nd transit agency.

Where can I buy Stored Value?

Stored Value can be purchased at TAP vending machines, online at TAPTOGO.net, by calling 866.TAPTOGO, at Metro Customer Centers and at over 415 TAP vendor locations throughout LA County. And upon Board approval (March 2018), Stored Value will be available for sale onboard buses. Customers can use their own TAP card or purchase one from the operator.

Why offer Stored Value sales on the bus?

Customers transferring from one agency to another must have a TAP card loaded with enough Stored Value to pay for the transfer. Making Stored Value available for purchase onboard bus will increase customer convenience and eligibility for automatic transfers on TAP.

What will be the process for loading Stored Value on buses?

Customers will be able to load Stored Value by boarding the front of the bus and requesting to add Stored Value to their TAP card. TAP cards will also be available for purchase on bus along with Stored Value, up to \$20.

Why replace Day Pass sales with Stored Value sales onboard the bus?

Day pass sales have declined by 74% since August 2011, while Stored Value sales have increased systemwide. Replacing Metro Day Pass purchases onboard bus with the ability to reload Stored Value will allow passengers to add fare immediately to their TAP card, which is necessary for Transfer on 2nd Boarding.

Will this proposal eliminate Metro Day Pass?

No, Metro Day Passes are available for sale at TAP vending machines, online at TAPTOGO.net, by calling 866.TAPTOGO, at Metro Customer Centers and at over 415 TAP vendor locations throughout LA County.

Why are tokens being phased out?

The use of TAP cards has caused Metro tokens to become obsolete. As token use continues to decline, TAP cards have proven to be a viable, cost effective replacement that enables simpler, safer and automatic farebox collection. Tokens cannot be used to purchase transfers currently.

How long will it take for tokens to be phased out?

If approved by the Metro Board, the sale of tokens will cease in May of 2018. Tokens already in circulation will still be accepted until March of 2019.

What will replace tokens?

TAP cards will replace tokens. Social service agencies will be offered limited use TAP cards to distribute to their clients.

Why are TAP card prices increasing?

Currently, the cost of TAP cards is inconsistent depending on where TAP cards are sold. It is recommended that cards should be priced at \$2 at all pass sales venues. There will be an increase of \$1 to customers who purchase TAP cards onboard the bus and at rail stations. A TAP card's life was originally set for 3 years, it has since been extended to 10 years so it will be cheaper for the customer over the life of the TAP card.

When will these changes take place and how will customers be notified?

If approved, replacing Metro Day Pass with Stored Value onboard bus will take place in March 2018. The sale of tokens will cease in May of 2018 and will be accepted until March of 2019. The \$2 TAP card price consistency will be implemented in Summer of 2018. For each effort, customers will be notified through a print and digital marketing campaign.

Are the costs of Metro to Muni transfers increasing?

No.

Will the cost of Reduced Fare cards be increased?

No. Reduced Fare TAP cards will remain free of charge to qualified applicants.

Why should I register my TAP card?

If you purchased your TAP card online or by phone, or if you have a Reduced Fare TAP card, your card is already registered. If you purchased your card at a TAP vending machine or TAP vendor location, register your card to take advantage of Balance Protection, general account management and additional features such as Autoload.

How can I get a reduced fare TAP card?

If you are a senior citizen, a person with a disability, a college or vocational student, or a K-12 student, you may be eligible for reduced fares. To review reduced fare eligibility and apply for a Reduced Fare TAP card, visit TAPTOGO.net or a Metro Customer Center.

RESULTS OF JANUARY 17, 2018 PUBLIC HEARING FOR CUSTOMER READINESS RECOMMENDATIONS FOR TRANSFER ON 2ND BOARDING

PUBLIC COMMENT

On Wednesday, January 17, 2018, a public hearing on possible customer readiness recommendations was held with the Finance, Audit and Budget Committee of the Metro Board. Out of an estimated customer base of 1.2 million daily transit riders, testimony from six speakers was heard. In addition to the verbal testimony, 70 emails and other written comments were submitted into the public record on this subject. Collectively, 76 responses on the fare proposals were received by the close of the public record through midnight, January 17, 2018.

Below is a summary of the written and oral comments relevant to the customer readiness recommendations for Transfer on 2nd Boarding.

Replace Day Pass Sales with Stored Value onboard Bus

Of the 29 comments received on this topic, 11 comments favored the recommendation to replace Day Pass sales with Stored Value on bus. The remaining 18 comments raised concerns with this recommendation. With consideration to the written and oral comments received on this topic, staff supports the original recommendation to replace Day Pass sales with Stored Value on buses. A summary of comments and staff responses are highlighted below:

Summary of Comments

Comments		Staff Responses	
Transit dependent riders do not live near TAP vending machines and therefore do not have other convenient methods for purchases Day Passes		Day Pass sales will continue to be available online at <i>taptogo.net</i> , by calling 866.TAPTOGO, at Metro Customer Centers, at TAP vending machines located at all Metro rail, Silver Line and Orange Line stations, at El Monte Transit Center, at Patsaouras Bus Plaza, and at over 400 TAP vendor locations. As evidenced in the Title VI analysis on discontinuing Day Pass sales on bus (see Attachment C), there is no significant difference in minority representation between riders who only have walk access to the bus and those who also have walk access to other sources for TAP card reloading sources.	
Potential financial impact on customers		With the addition of the Board Approved two hour Metro to Metro transfer, customers have the ability to pay a base fare of \$1.75 to travel in one direction on multiple lines. They can also make the return trip for \$1.75 as well, effectively saving \$3.50 when compared to the cost of a \$7 Day Pass. This is the primary reason for the 85% decline on Day Pass sales on bus.	
Agree with the addition of Stored Value sales, however disagree with removing Day Pass sales		See above.	
Stored Value sales onboard bus will prolong boarding times Bus operator farebox errors during Stored Value reloads will financially impact customers		TAP staff does not anticipate an increase in boarding time due to the fact that Day Passes will be removed. TAP expects to see a decrease in dwell times due to automatic payment of interagency transfers.	

Eliminate Tokens and Transition to TAP

Of the 19 comments received on this topic, 11 comments favored the elimination of tokens and transition to TAP cards. The remaining 8 comments raised concerns with this recommendation. A summary of comments and staff responses are highlighted below:

Summary of Comments

Comments		Staff Responses	
<ul style="list-style-type: none">Social Services and nonprofit organizations need tokens to distribute		<ul style="list-style-type: none">Social service agencies and nonprofit organizations will receive limited use TAP cards for distribution, which will work just like tokens with added benefits such as free Metro to Metro transfers.	
<ul style="list-style-type: none">Impact on riders with disabilities, including visually and cognitively impaired riders.		<ul style="list-style-type: none">Staff will also work with Communications to launch a public information effort to encourage seniors and persons with disabilities, who pay with cash or tokens, to apply for a reduced fare TAP card.Reduced fare TAP cards enable riders to travel with free transfers and the ability to ride at the lowest possible base fare and monthly passes. TAP cards protect riders’ fare balance from loss or theft. Cash and tokens cannot be replaced if lost or stolen.	
<ul style="list-style-type: none">Although Access ID TAP cards may be tapped for free fare on fixed route transit systems, Access vehicles do not have a TAP validator.		<ul style="list-style-type: none">Just 2.5% of Access’ vehicles transactions are paid for with tokens. Staff will work with Access to ensure their customers who use tokens can transition smoothly to other trip purchase options such as: Access coupon books, using cash and/or credit/debit cards.	
<ul style="list-style-type: none">What do riders do with unused tokens?		<ul style="list-style-type: none">Token sales will end mid-May 2018. Customers will have up to 18 months to use their existing supply of tokens	
<ul style="list-style-type: none">Difficulty in determining TAP card balance. Tokens are distinguishable from U.S. currency		<ul style="list-style-type: none">Upon request, bus operators can tell passengers their TAP card balance informationTAP vending machines can display or announce TAP card balance as well	

\$2 TAP card cost consistency

Of the 26 comments received on this topic, 12 comments favored making the \$2 TAP card cost consistent across all TAP card purchase points. The remaining 14 comments raised concerns with this recommendation. A summary of comments and staff responses are highlighted below:

Summary of comments

Comments		Staff Responses	
<ul style="list-style-type: none">Impact on low income ridersFirst time riders are disadvantaged		<ul style="list-style-type: none">As the Title VI analysis (see Attachment H) reflects, there is no disparate impact on any group of riders including low income and first time riders, due to TAP cards having a 10 year lifetime, instead of 3 yearsLow income and first time riders can also take advantage of the free 1 million TAP card distribution	
<ul style="list-style-type: none">TAP card cost should be \$1		<ul style="list-style-type: none">TAP cards are \$1 on Metro buses and at TAP vending machines as a result of a long running promotion where Metro subsidized the	

everywhere	remaining \$1 to the TAP region. As that promotion comes to a close, TAP cards will be \$2 at all customer purchase touch points. <ul style="list-style-type: none">Reduced Fare TAP cards such as Senior/Disabled, College/Vocational and K-12 Student will remain free to qualifying customers.
<ul style="list-style-type: none">TAP card costs should not be increased	<ul style="list-style-type: none">TAP card costs are currently not consistent across the system. They are \$2 when purchased online, by phone, at Metro Customer Centers and at over 400 TAP vendor locations.In addition, the TAP card life has increased from 3 to 10 years, making the impact de minimis.

PUBLIC HEARING COMMENTS

WRITTEN COMMENTS																						
No.	Date Received in Public Hearing Inbox	Name	Email Address	Is the Comment on topic?	If Yes - Positive or Negative ?	If No or if Multiple Subjects - What is the Subject?	Brief Summary	Removal of Metro Day pass	Transfer fees	TAP card price	What to do with old tokens?	Replace Day pass with Stored Value on Bus	Transition Tokens to TAP	Transfer on 2nd boarding	Paper Transfers	Transfer time	Stored Value Min/Max	Mixing up IAT w/ Internal Metro transfer	Token-Social Service/ Non Profit	Metro Fares	TAP Provided Response to Constituent /Customer Relations	Other
1	12/12/2017 ; 12/14/17	Alexander Friedman	alek3773@gmail.com	No		IAT transfer fees	Question- is the proposed transfer to another bus agency also going to be free? Or will the cost be \$0.50 deducted from SV?		x													
2	12/13/2017	Hon Lung Cheng	chef_lung@yahoo.com	Yes	Both		Disabled patron requesting that day passes continue to be sold; Agrees with increasing TAP card price	x			x											
3	12/14/2017	Juanita Rubio-Griepsma	rubio@bacup.net	Yes	Positive		"I vote YES"			x		x	x									
4	12/14/2017	Monica Murray	monicamurray79@yahoo.com	Yes	Negative		Do not discontinue tokens. Limited access to TAP cards. Prefer cash and paper transfers						x									
5	12/14/2017	Scott Lawrence Lawson	scottlawrencelawson@gmail.com	Yes	Negative		How does the TAP card price support transfers? Increase will hurt low income riders			x												
6	12/13/2017	Patrick Pun	pun.chunkit@yahoo.com	Yes	Negative	Stored Value purchases	Suggests adding SV and keeping Day Pass; eliminating day pass hurts customers who start their trip on the bus	x														
7	12/13/2017	Mark Bonilla	mark.mathguy@gmail.com	Yes	Negative		Riders still need paper transfers in LA County; Use of an IAT automatically removes Metro internal free transfer								x							
8	12/13/2017	David Fukumoto	web@davidfukumoto.com	Yes	Negative		TAP cards substandard quality; replacing day passes with SV will increase costs for riders; wants a 4 hour transfer period	x				x				x						

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28	12/11/2017	David Bailey	david@davidabailey.com	Yes	Positive		In support of changes to TAP; Metro should explore proof of payment for all buses; TVMs on buses to avoid conflicts with operators			x		x	x								x
29	12/11/2017	Aram Hacopian	aramhacopian@gmail.com	Yes	Negative		\$2 TAP card price is expensive if you are not a regular rider; get Metrolink and other cities to accept TAP cards			x											x
30	12/14/2017	Judy Boroch	Judy.Boroch@webush.com	No	Negative	Metrolink Transfers; Parking costs	Charging metrolink passholders for transferring to Metro; Upland Station parking costs		x												
31	12/14/2017	Dan Mick	danmick@gmail.com	Yes	Positive		They all sound good to me			x		x	x								
32	12/14/2017	Alison	alisonmanheim@verizon.net	Yes	Positive		Paying for transfers with SV is easier							x							
33	12/14/2017	Frank Weeks	feweeeks@mac.com	Yes	Positive		Supportive of transfer on 2nd boarding and consistent TAP card pricing; thinks TAP cards should be \$1 not \$2			x				x							
34	12/14/2017	Marbel Juarez	bellemmj@me.com	Yes	Negative		Why would you raise prices when Metro is always having maintenance issues; take a look at transportation in Chicago & New York			x											x
35	12/15/2017	Matthew Crotteau	matt@mattcrotteau.com	Yes	Positive		Longer transfers are awesome							x							
36	12/15/2017	Regina Smith	reggie_ah_gogo@yahoo.com	No		N/A	"Thank You"														x
37	12/15/2017	Craig Coleman	coalago@live.com	No		Stored Value purchases	What is Stored Value sale?														x
38	12/17/2017	Ferris McLeod	ferrisb87@gmail.com	Yes	Positive		agree with all proposed changes			x		x	x								
39	12/18/2017	Carl Geiberger	CarlG@srfpublshers.org	No		System is behind	Even with proposed streamlining, system is behind; London Metro accepts any UK credit card														x
40	12/18/2017	Deborah King	deborahking@economyofficesupply.com	Yes	Positive		Supportive of not selling passes on bus. Questions TAP card accessibility for handicapped, seniors and children					x									x
41	12/18/2017	Adam Emmer	AEmmer@burbankca.gov	Yes	N/A		Requests a call from Customer Service for explanation of proposal														x
42	12/18/2017	Fabian Campos	camposfa@guclia.edu	Yes	Both		Day Pass sale on bus-no because transit-dependent communities are not located near TVM; Agree with token phase out and card cost; expand all door boarding; create metro rapid plus			x		x	x								x
43	12/18/2017	Melissa Neifield	melissadouma@gmail.com	Yes	Both		Day passes are easier, do not do away with them, agree with token phase out and TAP card cost	x		x			x								x
44	12/18/2017	Lauren Campedilli	laurencampedilli@gmail.com	Yes	Both		Keep day passes on bus; \$2 TAP cards are too expensive; agree with token phase out	x		x			x								x

																		X			
45	12/18/2017	John de la Fontaine	marybetha@sbcglobal.net	Yes	Negative		Do not eliminate tokens, it's needed for social service functions											X			
46	12/19/2017	Jerry pooboo	jerrypooboo@gmail.com	Yes	Positive		Agree with \$2 TAP card; riders must be able to purchase TAP on every bus			x											x
47	12/19/2017	Sarah Evans	sarah-evans@sbcgloball.net	Yes	Negative		Tokens are needed for non profits			x		x	x					x			
48	12/19/2017	Rachel Ralston	rachel@lesardevelopment.com	Yes	Positive		agree with all changes														
49	12/19/2017	David Feinberg	David.Feinberg@SMGOV.NET	Yes	N/A		General confusion on why we are going to the board														x
50	12/19/2017	Mark Clemens	mark.works.hard@gmail.com	Yes	Positive		Stored Value on bus-agree; no opinion on tokens, ok with TAP card price but not thrilled			x		x	x								
51	12/20/2017	Aaron Hernandez	mrhorsemchorse@icloud.com	Yes	Negative		Eliminating day pass purchase from bus is disturbing	x									x				x
52	12/21/2017	M.G.	yks77@hotmail.com	Yes	N/A		What to do with unused tokens?				x										
53	12/27/2017	Carrie Wynes	aprillove153@yahoo.com	No		Metro fares	Metro monthly and weekly fares are too high												x		
54	12/29/2017	Tony Tallarico	tallarico@gmail.com	Yes	Negative		Price change of tap cards, raising the in-person purchase cost is unfair			x											
55	1/5/2018	Alexander Bruno	BrunoA@email.uaccd.edu	Yes	Negative		Make all TAP cards \$1			x											
56	1/6/2018	Dessa Kaye	dikaye@junoco.com	Yes	Negative		Keep paper transfers, tokens and day passes; unrelated Metro parking costs	x					x		x	x					x

57	1/7/2018	Bob Albertazzi	balbertazzi68@gmail.com	No	Both	Metro fares & infrastructure	Day passes should be eliminated; Bus operators give away free rides, TAP only payments on bus													X
58	1/10/2018	Paul Mercier	PMercier@mtsac.edu	No	N/A	Metrolink & Gold Line TAP card														
59	1/10/2018	Aracely Rivas	aracelyrivas2015@icloud.com	Yes	Positive		Agrees with day pass/SV replacement; get rid of tokens				X	X								
60	1/10/2018	Stephen Ma	ma212223@gmail.com	Yes	Negative		Customer believes that transfer on 2nd boarding will result in a cost increase for some passengers. Outline of a trip included as an example; all fare concessions should be on TAP.		X					X						
61	1/10/2018	Hank Fung	hank@bleeble.org	Yes	Both		Loading Stored Value- concerned about lost fares and driver/passenger error; TAP should continue to expand vendor network. Customer noted successful 7-11 pilot; Tokens-align end sale and use dates around a major Metro event; Raising TAP card cost is reasonable			X	X		X			X				X
62	1/11/2018	Miguel Lopez	mipastor11@yahoo.com.mx	Yes	Both		Consider third class or Elder civilian when phasing out tokens. They need prepaid options available; TAP and Metro service has been good thus far.						X							
63	11/17/2018	Danielle Valentino On behalf of the Metro CAC Chair and Citizens' Advisory Council (CAC)	valentinod@metro.net	Yes	Negative		The members of the public stated that elimination of tokens negatively impacts the ability of visually and cognitively impaired individuals to pay their fares on Access Services. The CAC members concurred with this concern. Mobile validators should be installed on Access vehicles. There is also no way for visually impaired riders.						X							
64	11/17/2018	Jessica Meaney On behalf of the Investing in Place	jessica@investinginplace.org	Yes	Negative		discontinuation of Day Pass sales on the metro buses due to the disparate impact this policy would have on bus riders. Metro to assess the feasibility of capping the fare amount charged on Stored Value at \$7.	X												X
65	11/17/2018	Abraham Chapman	abrahamchapman@hotmail.com	Yes	Negative		remove day pass sales on bus, i disagree with removing the option to buy a day pass on the bus. For many bus riders, a day pass is a better value. transition from tokens to tap, i disagree with getting rid of tokens. Tap cards fail. raise the price of tap cards to \$2, don't. With out tokens, one will need multiple loaded tap cards to serve as backup for when their main tap card inevitably fails.	X		X			X							

66	11/17/2018	Dwayne Coleman	dwayne.coleman55@yahoo.com	Yes	Negative		Regarding your proposal to have TAP cards \$2 everywhere sold, instead of \$1 in select locations; I think that is a bad idea. If anything, I think they should be \$1 everywhere. You also are processing to get rid of the Day Pass. That can be an inconvenience for visitors to the Los Angeles area if Day Passes are discontinued. Lastly, you mention how token sales have decreased. The fact that they are not at a discounted rate is why.	X		X			X										
67	1/17/2018	Katherine James	mzkl69@gmail.com	Yes	Positive		adding the Municipal transfer to the TAP card would be less confusing and an easier transition for the Bus Operators instead of dealing with the paper transfers. Also, adding an addition 30 minutes to the 2nd boarding would be beneficial to the passengers if they missed their connection on the 2nd boarding due to various reasons and make it so their TAP Card isn't charged an additional fare if their time has expired.	X				X		X	X	X	X						
68	1/18/2018	Charles Michel Deemer	west_high_49er@iuno.com	Yes	Negative		people wanting to transfer between the 2 counties will be forced to pay full fare each time they travel between 2 counties for non TAP enabled agencies. 7-11 and \$2.00 TAP cards. Negative impact on loading SV on board buses, people fumble with the machines around 15-20% of the time just getting 1-2 dollar bills accepted. I totally disagree with your intention to stop the sale of day passes on buses. You're showing a discriminatory preference for one bus rider over another. I'd suggest to help mitigate boarding speed only \$10, \$20 and possibly \$50. bills be accepted to purchase Stored Value.	X		X		X				X			X		X		X
69	1/18/2018	Kenneth Hak	ken151996@gmail.com	Yes/No	Negative	Reduced Fare card + expiration	No token at 10.75 per bag . I dont want u guys to replace day pass sales with stored value sales aboard metro buses ? It would be nice if we can go on bus and train on same day when have at train station vending machine .	X					X										X

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ORAL TESTIMONY TRANSCRIPTIONS

No.	Date of Public Testimony	Name	Email Address	Is the Comment on topic?	If Yes - Positive or Negative ?	If No or if Multiple Subjects - What is the Subject?	Testimony Transcript	Removal of Metro Day pass	Transfer fees	TAP card price	What to do with old tokens?	Replace Day pass with Stored Value on Bus	Transition Tokens to TAP	Transfer on 2nd boarding	Paper Transfers	Transfer time	Stored Value Min/Mas	Mixing up IAT w/ Internal Metro transfer	Token-Social Service/ Non Profit	Metro Fares	TAP Provided Response to Constituent /Customer Relations	Other
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Transfer on 2nd Boarding Customer Readiness
Implementation Timeline

Transfer on 2nd Boarding-Customer Readiness
Onboard Bus-Replace Day Pass with Stored Value & Metro Base Fare
Metro Token Elimination
Consistent \$2 TAP card cost
Transfer on 2nd Boarding Implementation
1 million TAP card distribution (IAT Mitigation)

Transfer on 2nd Boarding Customer Readiness Efforts

Finance, Budget & Audit Committee
Robin O'Hara, Deputy Executive Officer, TAP
March 14, 2018



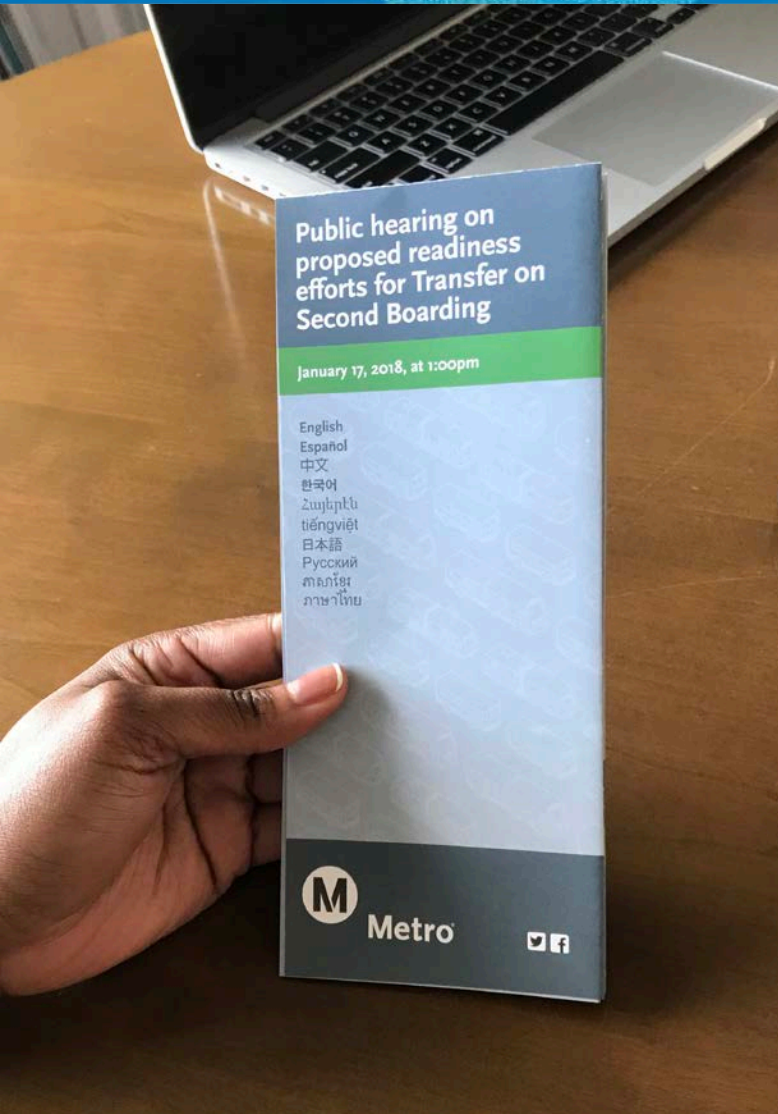
Transfer on 2nd Boarding - Review



- Regional interagency transfer policy (from one transit agency to another)
- Board approved June 2015
- Transfer period extended from 2 hours to 2.5 hours
- Transfers paid automatically with Stored Value on TAP
- Eliminates paper transfers

Public Outreach Efforts

6 Public Comments, 76 Total Responses



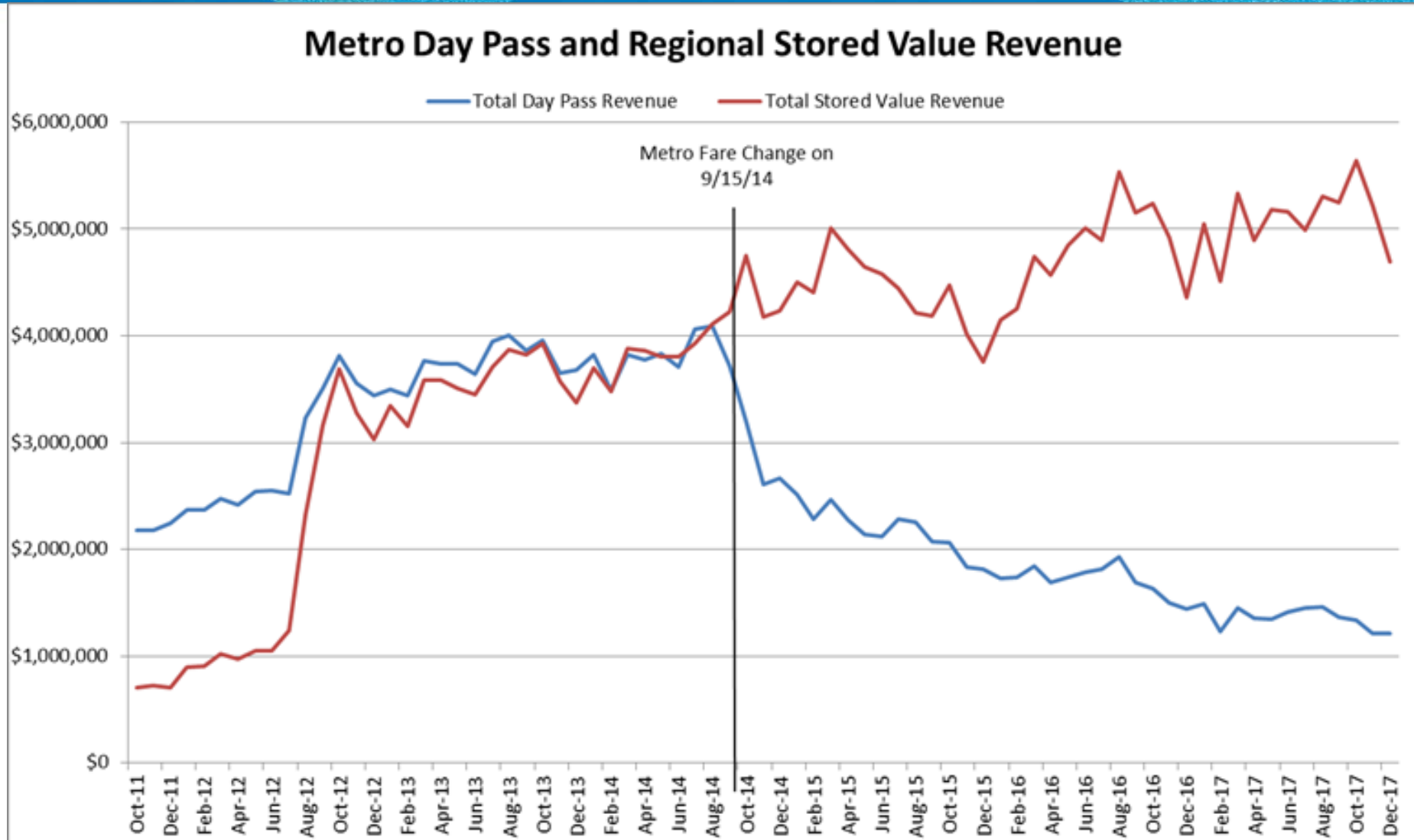
- Public hearing conducted January 17, 2018 at Finance, Budget and Audit Committee
- 75,000 Brochures distributed on buses and trains (10 languages)
- Public notices in newspapers
- Social media announcements
- Presentations to internal and external stakeholders

Summary of Public Comments on 3 Staff Recommendations:

Recommendation 1: Replace Day Pass with Stored Value

Concern:	Response:
Financial impact on low-income patrons	<ul style="list-style-type: none">• Customers pay \$3.50 for round trip with free internal transfers instead of \$7 Day Pass (savings of \$3.50)
Slower boarding	<ul style="list-style-type: none">• Increase in boarding times not expected since Day Pass sales would be removed• Decrease in dwell times expected due to automatic payment of Interagency transfers• Average stored value purchase for regular TAP card is \$8, enabling multiple boardings
Access to Day Pass	<ul style="list-style-type: none">• Day Pass sales still available via web, phone, TVMs, Customer Centers and 400+ vendors• Customers are moving to more economical base fare with free transfers: less expensive & primary reason for 88% decline in Day Pass sales• Less than 1% of transactions aboard buses include a Day Pass sale• Day Pass is trending down and Stored Value is trending up

Day Pass is trending down,
Stored Value is trending up



Summary of Public Comments on 3 Staff Recommendations (cont.):

Recommendation 2: Transition Tokens to TAP

Concern:	Response:
Distribution to Social Services and impact on low-income patrons	<ul style="list-style-type: none">• Social service agencies and nonprofits will receive limited-use TAP as replacement• 1 million free TAP cards are being distributed• TAP Cards enable many more benefits
Lack of ACCESS vehicle TAP hardware	<ul style="list-style-type: none">• Just 2.5% of Access vehicles' transactions are paid with tokens. Staff will work with Access to transition to other purchase options such as cash and coupons
No way to tell TAP balance	<ul style="list-style-type: none">• TAP balance is available on TAP readers and equipment• Bus operators can tell customers their balance

Summary of Public Comments on 3 Staff Recommendations (cont.):

Recommendation 3: \$2 TAP Card Price Consistency

Concern:	Response:
Impact on low income or first-time riders	<ul style="list-style-type: none">• 1 million free TAP cards will be distributed• All Reduced Fare TAP cards remain free• TAP card life is 10 years
TAP card costs should remain the same	<ul style="list-style-type: none">• TAP card costs should be consistent. They are \$2 when purchased via web, phone, and at vendors
TAP card cost should be \$1 everywhere	<ul style="list-style-type: none">• TAP cards are \$1 on Metro buses and at TAP vending machines as a result of a promotion. As that promotion comes to a close, TAP cards will be \$2 at all customer purchase touch points.• Reduced Fare TAP cards will remain free

Additional Readiness Efforts



- Distribute one million free TAP cards (Board-approved)
- Provide assistance from Metro Blue Shirts & TAP partner agency volunteers
- Increase TAP vendor network
- Provide “train the trainer” Operator demos for Metro and Region
- Provide TAP Call Center training
- Implement regional system-wide marketing together with TAP Partner Agencies

Requesting the Board to Approve these Customer Experience Recommendations

	Recommendation	Benefit
1	Replace declining Day Pass sales on bus with ability to purchase Stored Value on bus	<ul style="list-style-type: none">• Aligns operator efforts with fare sale trends• Increases Stored Value purchase touch points
2	Transition tokens to TAP	<ul style="list-style-type: none">• Replaces obsolete tokens with TAP• Enables balance protection, automatic transfers, faster boardings, etc.
3	Implement \$2 TAP card price consistency	<ul style="list-style-type: none">• Consistent & equitable pricing for all customers
4	Find adding Stored Value sales on buses results in a Disparate Impact but there is legitimate justification for adding it	<ul style="list-style-type: none">• Stored Value is expected to be in high demand since that is what is needed for agency-to-agency transfers• Adding SV on buses is expected to help correct the Disparate Impact