



Sent via email: <taac@toronto.ca>

February 22, 2021

Ms. Jennifer Lin
Secretariat Contact, Toronto Accessibility Advisory Committee
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

RE: DI14.1 Electric Kick-Scooters (E-scooters) - Accessibility Feedback (Ward All)

Dear Toronto Accessibility Advisory Committee,

I am writing in response to provide further context and information on the Transportation Services staff report referenced above that is before your Advisory Committee on February 25, 2021.

Bird Canada Inc. is a first KM / last KM, commercial electric scooter sharing company dedicated to bringing affordable, environmentally friendly transportation solutions to Canadian municipalities. We provide shared e-scooter services in Edmonton, Calgary and most recently this past summer in Ottawa.

Bird Canada takes the concerns of the accessibility community seriously. Since commencing operations in Canada, Bird Canada has actively sought out input from the accessibility community, meeting regularly with the Canadian National Institute for the Blind (CNIB) and hosting, in collaboration with e-scooter operator Lime, a recent accessibility stakeholder roundtable in Toronto in early November 2020.

In addition, among other things, the Bird app is accessible and compatible with screen readers and offers voiceover support for both iOS and Android users, on-page navigation, captions and text alternatives to images, and closed captioning for all videos. Bird's website also adheres to accessibility standards and our customer telephone support accommodates TTY relay services.

Summary

- **Insurance and Liability**
 - 3rd party coverage (covering injury to the public caused by a rider of an e-scooter either through negligent riding or negligent parking (not by the fault of the shared e-scooter operator) does not currently exist in North America. None of the over 55 cities in which Bird operates in North America require this insurance nor is it available.



- Canadian cities with permitted commercial shared e-scooter operations have not required the above 3rd party insurance coverage.
 - Bicyclists in Toronto and Bike Share Toronto are not required and nor do they possess the 3rd party insurance coverage, even if it were available.
 - The rate of injury from an e-scooter rider injuring a member of the public is virtually non-existent in Canada and this is true even in cities like Calgary that permit e-scooter riding on sidewalks.
- **Safety and Liability**
 - Calgary had close to 1M e-scooter trips in 2020 alone with permitted sidewalk riding. However, during the 2019 and 2020 pilot, there were only 3 incidents involving a pedestrian being injured by an e-scooter rider and 1 cyclist being injured by an e-scooter rider. There were 0 fatalities and 0 admissions to the ICU stemming from e-scooters.
 - Alberta Health Services comparative [analysis](#) found that during the 2019 and 2020 commercial shared e-scooter pilot, trips by bicycles, automobiles (vehicles) and motorcycles saw significantly higher emergency room, ICU, fatality, and surgeries required as compared with e-scooters.
 - Ottawa city staff [reported](#) an injury rate during their 2020 e-scooter pilot of 0.003 percent.
 - Montreal city staff [found](#) no fatal or serious accident involving an e-scooter during their 2019 pilot with only 4 minor injuries to e-scooter riders, yet over the [same period](#) they experienced 8 serious and 360 light injuries emanating from the JUMP shared e-bike program.
 - **“Lock-to” E-scooters**
 - “Lock-to” e-scooters operate with a lock (akin to a bike lock) attached to the e-scooter that is unlocked via an e-scooter share company app so that it may be locked to permitted municipal infrastructure.
 - In San Francisco, a [study](#) by the San Francisco Municipal Transportation Agency (SFMTA) found that complaints about sidewalk riding and improper parking were significantly reduced. Likewise, the Chicago Dept. of Transport. [found](#) a 79% decrease in 3-11 complaints-per-day-per-device in 2020 with “lock-to” e-scooters compared to 2019 without this requirement.
 - **Canadian and Ontario Context**
 - To date, British Columbia, Alberta, Ontario, and Quebec have adopted provincial regulation on e-scooters.
 - Calgary made their e-scooter program permanent after a 2-year pilot, Edmonton has renewed their e-scooter program for three straight years, and Ottawa City Council voted in February 2021 to continue their one year e-scooter pilot in 2020 into 2021 and expand it.



- Over a dozen other Canadian cities are at various stages of regulatory development towards commercial shared e-scooter programs.
- According to Ottawa City Councillor Tim Tierney, Chair of Ottawa's Transportation Committee, "There's a been a lot of thought put into this and, touch wood, it's probably been one of the more successful pilot scooter projects across the country if not throughout North America." ([Toronto Star](#))
- **Large Urban Peer Cities**
 - Hundreds of cities around the world have successfully introduced commercial shared e-scooter programs. Closer to home, 7 Canadian cities have introduced and managed commercial shared e-scooter pilots to date with that number growing.
 - In 2019, Toronto temporarily banned both personally owned and commercial shared e-scooters until such time as a regulatory framework can be introduced, despite the growing prevalence of e-scooter ridership on city streets where no regulations currently exist.

Insurance and Liability

In North America, public or rider injury caused by the negligence of an e-scooter operator like Bird Canada (i.e. shared e-scooter improperly maintained) is covered by the Commercial General Liability (CGL) insurance policies. Cities in Canada with commercial shared e-scooter programs already require e-scooter operators to possess these policies.

However, despite the statement by Transportation Services staff in their presentation that "3rd party coverage must be provided by e-scooter companies for riders", 3rd party coverage does not currently exist in North America:

- 3rd party coverage covers rider liability: Injury to the public caused by a rider of an e-scooter either through negligent riding or negligent parking (not by the fault of the shared e-scooter operator)

Canadian cities with permitted commercial shared e-scooter operations to date including Kelowna, Calgary, Edmonton, Waterloo, Ottawa, Montreal, and Westmount, have not required the above 3rd party insurance coverage. To date, no U.S. city has required this 3rd party insurance coverage either.

It should be noted that while this 3rd party insurance coverage is available in a select few cities in the European Union (EU) such as Italy, the insurance carriers providing this insurance in these EU cities have been unwilling to write this policy in North America.

We understand that individual riders of personally owned bicycles in the City of Toronto and Bike Share Toronto are not required and nor do they possess, even if it were available, the above 3rd party insurance coverage covering injury to members of the public by negligent



bicycle riders. This is despite the fact that in cities like Calgary, the number and severity of injuries sustained by riders of personally owned bicycles vastly outnumber those of commercial shared e-scooter riders (see section below re Canadian and Ontario context for further information).

Moreover, cities around the world are not regulating injury to a person themselves riding an e-scooter. Like bicycle riders, insurance for this is not being required globally.

Below is a table covering the availability of various insurance coverages with respect to commercial shared e-scooters in North America and the European Union, as compared to Bike Share Toronto.

		North America	European Union	Bikeshare TO	Comments
1	Commercial General Liability	✓	✓	✓	<ul style="list-style-type: none"> Insurance covers rider and public against negligence from e-scooter company
2	Insurance covering injury to rider from rider fault	✗	✗	✗	<ul style="list-style-type: none"> Like bicycle riders, insurance for this is not required globally
3	Insurance covering injury to public from rider	✗	✓	✗	<ul style="list-style-type: none"> A select few EU cities only Insurance carriers are unwilling to make this same insurance available in North America currently

It is important to note that the U.K. (and Germany), although referred to by Transportation Services staff, are not relevant examples and nor are comparisons fair to the U.K. (and/or Germany). Paris and Germany regulate e-scooters as “motor vehicles” and thus automobile liability coverage is required. Though it was hard to obtain, this same automobile type coverage is available in the U.K.

In these cities (Paris, France, Germany and U.K.), e-scooters qualify for automobile insurance because they are viewed at law as essentially one in the same to cars and are therefore insured like cars. This does not suggest anything regarding the risk to third parties posed by e-scooters. It is simply a function of how e-scooters are regulated in these places. E-scooters are considered “motor vehicles” in Paris, France, U.K. and Germany, and thus have the same insurance as a car, which is also a “motor vehicle” at law.

In Canada, e-scooters are not “plated” and thus don’t qualify for coverage under the automobile insurance regime. We understand that the same goes for individually owned bicycles in the City of Toronto and Bike Share Toronto. Either way, the insurance Bike Share Toronto has is comparable to what Bird Canada has for insurance coverage in Canadian cities.



Safety and Liability

With respect to safety and liability issues, Transportation Services staff point to German and Australian research about e-scooter riders being more prone to injure others as compared to bicycle riders and e-scooter riders preference for sidewalk riding.

In Canada, municipal staff reports from cities including Calgary, Ottawa, and Montreal, with commercial shared e-scooter programs, reveal these concerns raised by Toronto Transportation Services staff to be largely unwarranted to date.

Calgary

In Calgary, city staff commissioned a study with Alberta Health Services and the University of Calgary Cumming School of Medicine. This study aimed to better understand who, how, when, and why people were being injured on shared e-scooters which are permitted to be operated on sidewalks, among other designated locations like cycle tracks, etc. The study took place from July 8, 2019 to October 31, 2019 and from May 22, 2020 to September 30, 2020.

This study retrospectively reviewed paper medical records of all patients presenting to Adult Emergency Departments in Calgary who arrive via emergency medical services (EMS) with the term “scooter” included in the triage note. One research assistant reviewed each paper chart in the secure Health Records Office and transcribed de-identified data onto the Case Report Form.

The key [findings](#) from the study include:

- 71 out of 75 people injured during the pilot were riding on an e-Scooter; three incidents involved pedestrians and one incident involved a person cycling

Again, it is important to note that Calgary had close to 1M e-scooter trips in 2020 alone by over 200K unique riders with permitted sidewalk riding. During the 2019 and 2020 e-scooter pilot, only 3 incidents involved a pedestrian being injured by an e-scooter rider and 1 cyclist being injured by an e-scooter rider. There were 0 fatalities and 0 admissions to the ICU stemming from e-scooters.

On the other hand, Alberta Health Services comparative [analysis](#) examined injuries requiring an ambulance that involved bicycles, motorcycles, and/or motor vehicles. During the 2019 and 2020 commercial shared e-scooter pilot, trips by bicycles, automobiles (vehicles) and motorcycles saw significantly higher emergency room, ICU, fatality, and surgeries required as compared with e-scooters.



Table 4: AHS Data on Number of Transportation Injuries Requiring an Ambulance

Type	2019 (July 8 to October 31)				2020 (May 22 to September 30)			
	E-Scooter	Bicycle	Vehicle	Motorcycle	E-Scooter	Bicycle	Vehicle	Motorcycle
Emergency	33	197	502	103	42 ¹	484	617	166
ICU	0	4	17	3	0	3	11	5
Fatality ²	0	1	3	0	0	3	4	1
Surgery	8	33	51	35	24	109	79	57

¹ There were an additional 25 e-Scooter injuries requiring EMS that did not contain detailed patient records in 2020.

² Fatality numbers do not include those who died on site. There were no e-Scooter fatalities.

Ottawa

During the 2020 commercial shared e-scooter pilot in Ottawa, city staff [reported](#) that, “To date, staff are aware of reports of seven minor injuries caused by e-scooter falls or collisions. These reports are from a combination of residents emailing staff, riders reporting injuries to e-scooter operators and OPS [Ottawa Police Services] contacting staff. This represents an injury rate of 0.003 per cent.”

Montreal

During the 2019 commercial shared e-scooter pilot in Montreal, city staff [found](#) no fatal or serious accident involving an e-scooter with only 4 minor injuries from e-scooters, yet over the [same period](#) they experienced 8 serious and 360 light injuries emanating from the JUMP shared e-bike program.

In addition, the city staff report analyzing the 2019 pilot, makes no mention of issues related to sidewalk riding. This is likely because sidewalk riding was not permitted for e-scooters and like Toronto, Montreal is a large and densely populated metropolis with busy sidewalks that prevent/deter e-scooter sidewalk riding and sufficient and expanding active mobility infrastructure (bike lanes).

“Lock-to” E-scooters

Commercial shared e-scooters with “Lock-to” parking solution technology operate with a lock (akin to a bike lock) attached to the e-scooter that is unlocked via an e-scooter share company app. This technology is not “still emerging” and is in fact adequate as it’s being used in a number of large U.S. cities.

Unlike smaller cities, large urban cities like Toronto generally have more adequate levels of available permitted infrastructure for locking e-scooters to, such as bike racks, etc. If approved,



Toronto would be the first Canadian City with this parking solution. While this parking technology enhances parking compliance, it will reduce overall trip volumes.

In San Francisco, commercial shared e-scooters are required to be “lock to” and locked to municipally permitted infrastructure at the end of a trip. Upon locking the e-scooter, riders are required to take a photo of the e-scooter locked to a bike rack or permitted infrastructure. A [study](#) by the San Francisco Municipal Transportation Agency (SFMTA) found that:

- Complaints about sidewalk riding and improper parking were significantly reduced under the [Shared E-scooter] Pilot
- The lock-to design addresses major issues with sidewalk clearance and pedestrian safety

Data collected by Scoot in San Francisco (Bird operates under the “Scoot” brand in San Francisco) found that with “lock-to” e-scooters, they were parked properly 99.2% of the time. Likewise, the Chicago Dept. of Transport. [found](#) a 79% decrease in 3-11 complaints-per-day-per-device in 2020 with “lock-to” e-scooters compared to 2019 without this requirement.

Some raise concerns that “lock-to” e-scooters can be locked to infrastructure that is not permitted such fencing or rails) and the addition of e-scooters being locked to bike racks “would worsen the number of sidewalk obstructions on already narrow and cluttered sidewalks”. In response to the above concerns, the same can be said of bicycles in the City of Toronto. The City permits bicycles to be locked to municipally permitted infrastructure like bike racks and on occasion bicycles are in fact locked to non permitted infrastructure like handrails, etc.

The difference with commercial shared e-scooters as compared to personally owned bicycles is important from an accountability and enforcement point of view:

- Unlike bicycle riders, commercial shared e-scooters riders are required to take a photo of the e-scooter locked to a bike rack or permitted infrastructure before they can end their trip. An e-scooter locked to non permitted infrastructure can result in a warning, financial penalty or removal from the app for repeated infractions. This level of accountability is not possible with individual bicycle riders locking their bicycles to municipal infrastructure in the City of Toronto, yet the City permits this activity.
- Unlike for bicycles, if permitted to operate in a City, commercial shared e-scooter operators like Bird Canada employ a “Safe Streets Team” to manage the public right of way. Notification via internal apps and monitoring tools or general street level observation about “lock-to” e-scooters misparked, enables quick response times to rectify the situation. Again, this level of enforcement and response is not possible with misparked bicycles in the City of Toronto, yet the City continues to permit riders to lock bicycles to permitted infrastructure.



- Lastly, the City of Toronto's permitted municipal infrastructure for bicycle parking (and presumably e-scooter parking if commercial shared "lock-to" e-scooters were permitted) is in fact broader than just bike racks. The City of Toronto permits locking bicycles to a broad range of permissible infrastructure including poles, metal cages around trees, etc. While bicycle parking can always be increased, it's also not necessarily inadequate if the City of Toronto were to permit an initial small-scale commercial shared e-scooter pilot downtown of no more than three operators with a maximum initial shared fleet size of 600 e-scooters per approved operator.

Canadian and Ontario Context

In just over 2 years, there have been significant developments related to e-scooters in Canada. To date, British Columbia, Alberta, Ontario, and Quebec have adopted provincial regulation on e-scooters. While the form these rules take vary by Province, they all have the same purpose of permitting the shared use of e-scooters in municipalities that wish to make them available to local residents (in addition to individually owned e-scooters in Ontario).

- **British Columbia** has an Active Transportation strategy "["Move Commute Connect"](#)". On Oct. 7, 2019, the BC government introduced [amendments to the Motor Vehicle Act](#) to permit e-scooters and pilots which were passed into law in late 2019. In January 2020, the BC government announced it was accepting applications from municipalities with respect to micro-mobility (shared e-scooters) with approval via Order in Council forthcoming (delayed due to COVID-19 in 2020).
- **Alberta** has issued a [regulatory exemption](#) for electric scooter companies that is issued upon a municipality issuing a permit to an e-scooter company to operate locally. Bird Canada was granted a regulatory exemption by the Province in 2019 to operate an e-scooter share by the Province.
- **Quebec** Minister of Transport on June 19, 2019, authorized a "[Pilot project concerning electric scooters for self-service rental](#)". This was the first province in Canada to provide a regulatory framework for electric scooter share in Canada. Bird Canada has been [authorized by the Province](#) to participate in this Pilot.
- **Ontario** Minister of Transportation introduced [amendments to the Highway Traffic Act](#) to permit a 5-year e-scooter pilot that came into force on Jan. 1, 2020 that permits municipalities to have e-scooters on public roads (both shared scooters from companies like Bird Canada and individually owned and used scooters on public roads).

With respect to Canadian cities:



- **Richmond:** City Council directed staff to develop a regulatory framework for commercial shared e-scooters in 2019
- **Victoria:** Delayed by COVID-19, city staff are developing a regulatory framework for commercial shared e-scooters. The Mayor of Victoria previously wrote to the Province requesting regulatory permission.
- **Vancouver:** City Council voted in 2020 to permit a personally owned e-scooters pilot
- **Calgary:** 2-year commercial shared e-scooter pilot made permanent in Jan. 2021
- **Edmonton:** Commercial shared e-scooter pilot renewed for third year in 2021
- **Winnipeg:** City staff made a formal request to the Province to permit e-scooters on roads in Dec. 2020 and a commercial shared e-scooter pilot
- **Brampton/Hamilton/Mississauga:** All cities have city staff reports coming this Q1/Q2 2021 on commercial shared e-scooters after Hamilton and Mississauga approved use of personally owned e-scooters
- **London/Windsor:** Both cities have issued RFPs for commercial shared e-scooters in late 2020 and early 2021
- **Waterloo Region:** Launched public consultations in January 2021 on commercial shared e-scooters prior to possible regulation
- **Montreal:** Commercial shared e-scooter pilot in 2019
- **Westmount:** Commercial shared e-scooter pilot in 2019
- **Halifax:** City Council directed city staff to develop regulatory framework for commercial shared e-scooters in 2019 pending provincial regulatory approval

The City of Toronto Transportation Services presentation references Calgary and Ottawa for more detailed exploration in the presentation material shared with the Advisory Committee. It is important to note that commercial shared e-scooter operations in both of these cities have been successful programs: Calgary made their e-scooter program permanent after a 2-year pilot and Ottawa City Council voted in February 2021 to continue their one year e-scooter pilot in 2020 into 2021 and expand it.

City of Toronto Transportation Services staff note that both Calgary and Ottawa do not have bike share. While this is true (although Calgary did have dockless bike share in 2019), it is important to note that bike share systems (docked or dockless) often operate in the same City with commercial shared e-scooter operations. In fact, according to the [U.S. Department of Transportation Bureau of Transportation Statistics](#):

Dockless bikeshare and e-scooter systems expanded coverage [from existing docked bike share systems], first appearing in the U.S. in 2017. As of August 2020, there are 50 dockless bikeshare systems and 145 e-scooter systems (not counting systems limited to college or employer campuses). **Many systems serve the same city.** As of August 2020, dockless bikeshare systems serve 45 cities and e-scooters serve 69 cities. [Emphasis added]



Ottawa

According to Ottawa city [staff](#), "In the 2020 pilot, e-scooters provided residents with a convenient, physically distanced mobility option that some residents used to replace short car trips. They also encouraged residents to support local businesses and were observed to have a very low rate of reported injuries."

According to Ottawa City Councillor Tim Tierney, Chair of Ottawa's Transportation Committee:

- "There's a been a lot of thought put into this and, touch wood, it's probably been one of the more successful pilot scooter projects across the country if not throughout North America." ([Toronto Star](#))
- "There are "many positive highlights in our pilot, especially how we managed to put limits in place to ensure scooters would not be laying everywhere and now we've become a new gold standard for other municipalities looking to implement." ([Ottawa Sun](#))

With respect to the environment:

- 27% indicated that they chose to use an e-scooter to reduce GHG emissions
- Reduction in GHG emissions: 46% reported driving less and 33% reported travelling less as a car passenger.

With respect to local economic impact:

- 48% of e-scooter trips started in a BIA and 45% ended in a BIA, bringing residents to local businesses and supporting Ottawa's economic recovery during COVID-19.
- Of the 34% of e-scooter riders who visited a local business and the 33% who visited a local restaurant:
 - 6% reported spending more than \$100 on a typical visit
 - 18% spent between \$51 and \$100
 - 36% spent between \$21 and \$50.

Calgary

According to Calgary city staff, "Micromobility services (e.g. shared e-Scooters and e-Bikes) funded by the private sector provide additional mobility options and recreation to Calgarians". Upon the 2-year e-scooter pilot being made permanent in the City, [Mayor Naheed Nenshi stated](#), "Even when people were staying close to home (in 2020) we still saw an increase in use. Ultimately, people enjoy these things. The majority of the uses are to run errands and just for fun, and there's nothing wrong with having a little fun as long as you're doing it safely."

Calgary city staff also noted that commercial shared e-scooters:

- Commercial shared e-scooters provided local residents with a choice to not take a personal car which contributes to traffic congestion. In Calgary, [1 in 3 shared e-scooter trips replaced a car trip](#).
- Over 1M shared e-scooter trips as of June 2020 with [more than 1M KM's travelled](#)
- More than 50% of e-scooter trips end in a BIA or Business Revitalization Zone (BRZ).



As noted above, Calgary city staff commissioned a study with Alberta Health Services and the University of Calgary Cumming School of Medicine. City of Toronto Transportation Services staff note in their presentation that it is “Likely that e-scooters have the highest rate of injury per transportation mode”, although this assertion does not appear to have been stated anywhere, in neither the 2019 nor the 2020 City of Calgary staff report on e-scooters.

On the other hand, during the 2019 and 2020 commercial shared e-scooter pilot in Calgary, trips by bicycles, automobiles (vehicles) and motorcycles saw significantly higher emergency room, ICU, fatality, and surgeries required as compared with e-scooters (see table below):

Table 4: AHS Data on Number of Transportation Injuries Requiring an Ambulance

Type	2019 (July 8 to October 31)				2020 (May 22 to September 30)			
	E-Scooter	Bicycle	Vehicle	Motorcycle	E-Scooter	Bicycle	Vehicle	Motorcycle
Emergency	33	197	502	103	42 ¹	484	617	166
ICU	0	4	17	3	0	3	11	5
Fatality ²	0	1	3	0	0	3	4	1
Surgery	8	33	51	35	24	109	79	57

¹ There were an additional 25 e-Scooter injuries requiring EMS that did not contain detailed patient records in 2020.

² Fatality numbers do not include those who died on site. There were no e-Scooter fatalities.

Large Urban Peer Cities

Reviewing the portion of the City of Toronto Transportation Services presentation on Large Urban Peer Cities might lead one to believe that commercial shared e-scooters are relegated to a few cities globally. In fact, commercial shared e-scooters are available in >100 cities globally and growing. As one commercial e-scooter operator, Bird operates in nearly 100 cities globally:

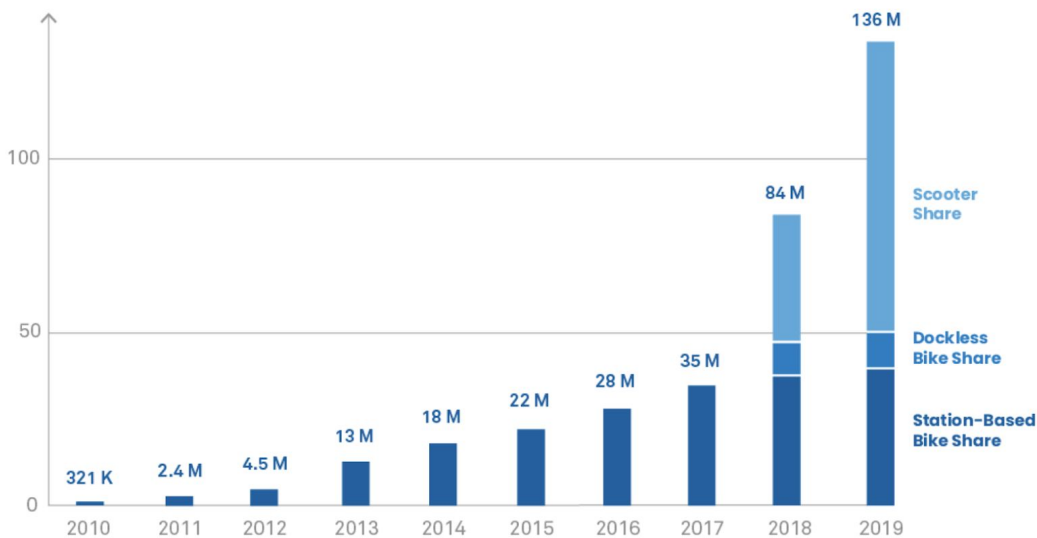


Europe	Verona	Columbia	Montgomery County
Annecey	Vienna	Columbus	Nashville
Antwerp	Middle East	Coral Gables	Norman
Barcelona	Givatayim	Culver City	Oakland
Berlin	Ramat Gan	Dallas	Phoenix
Bordeaux	Tel Aviv	Denver	Portland
Cologne	North America	Detroit	Richmond
Frankfurt	Mexico City	Durham	Salt Lake City
Hamburg	South America	Fairfax	San Diego
Krakow	Santiago - Las Condes	Fort Collins	San Francisco
Lisbon	United States	Ft. Lauderdale	San Jose
Lyon	Alexandria	Harrisonburg	Santa Monica
Madrid	Arlington	Indianapolis	Scottsdale
Marseille	Atlanta	Kansas City	St. Louis
Munich	Austin	London	Tallahassee
Paris	Bakersfield	Long Beach	Tampa
Redditch	Bloomington	Los Angeles	Tempe
Rimini	Boise	Louisville	Tucson
Rome	Brookline	Memphis	Tulsa
Sevilla	Charlotte	Meridian	Virginia Beach
Stockholm	Cincinnati	Miami	Washington DC
Torino	Cleveland	Milwaukee	

The National Association of City Transportation Officials (NACTO) compiles a [shared micro-mobility report](#) on North America annually. The report (not including data from European cities with e-scooter operations like Paris, Rome, Frankfurt, Stockholm, Vienna, etc.) and other parts of the world including South America and Australia, notes the sheer scale at which commercial shared e-scooter operations exist and flourish, eclipsing the number of trips compared to dockless and station-based bike share systems (see table below).

SHARED MICROMOBILITY RIDERSHIP GROWTH FROM 2010-2019, IN MILLIONS OF TRIPS

Source: NACTO





On the other hand, In 2019, Toronto temporarily banned both personally owned and commercial shared e-scooters until such time as a regulatory framework can be introduced, despite the growing prevalence of e-scooter ridership on city streets where no regulations currently exist.

In the end, Bird Canada takes the concerns of the accessibility community seriously. While there are always issues to be mitigated with respect to any municipal program and improvements that can always be made to existing programs, despite the concerns and objections outlined in this City of Toronto Transportation Services presentation, hundreds of cities around the world have successfully introduced commercial shared e-scooter programs. Closer to home, 7 Canadian cities have introduced and managed commercial shared e-scooter pilots to date with that number growing each year.

Sincerely,

A handwritten signature in black ink that reads "Chris Schafer".

Chris Schafer

Vice President, Government Affairs

Bird Canada

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