



**METROPOLITAN
TRANSPORTATION
COMMISSION**

Agenda Item 5

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Memorandum

TO: Policy Advisory Council

DATE: October 3, 2011

FR: Denise Rodrigues

W.I. 1114

RE: Title VI Update: Clipper® Title VI Summary Report and Public Participation and
General Title VI Update

This memorandum addresses Title VI activities within the agency: the first section is Clipper®-specific, while the second provides a general MTC status report. Staff is seeking input from the Policy Advisory Council on the draft Clipper® Summary Report findings and possible approaches for public participation.

Clipper® Title VI Summary Report

In February 2010, MTC adopted Resolution No. 3866. This resolution mandated that those transit agencies participating in Clipper® would need to transition pre-paid paper fare media to be Clipper®-only. After its adoption, MTC secured a consultant to conduct assessments of the Title VI impacts of each of these fare media transitions. The firm of Milligan and Company (through a sub-consulting arrangement under the Clipper® Technical Advisor Contractor) was selected to perform this assessment.

Beginning in May 2010, Milligan worked with the five transit operators for which fare media transitions were specified in Res. 3866 – AC Transit, BART, Caltrain, GGBHTD, and SFMTA – to gather demographic data and relevant information about their various fare products. Milligan also relied on MTC data on transit ridership in preparing its assessment. Milligan organized the analysis of the 30 fare products into 17 assessment reports. Once the individual reports were completed, staff consolidated them into a summary report and added a discussion of MTC's general initiatives to ensure equitable access to Clipper®. The draft Summary Report has been released for public comment and is attached to this memo as Attachment 1.

Ensuring Equitable Access to Clipper

MTC and transit agency staff have undertaken a number of initiatives to ensure that Title VI-protected persons have equitable access to Clipper program benefits and services, including:

- Customer Education – Conducted multiple and ongoing media campaigns in Chinese and Spanish advertising venues and vehicles.

Ensuring Equitable Access to Clipper (continued)

- Outreach – Held over 800 outreach events in coordination with the transit operators, as well as worked with Community Based Organizations to identify specific community needs.
- Customer Service – Enhanced multi-lingual capabilities at the Clipper Service Bureau.
- Card Distribution/Retailer Presence – Offered incentives to the Clipper Contractor to ensure sufficient retailer coverage in communities of predominately low-income and minority residents.
- Card fee – The \$5 card fee has been waived since June 2010.

Title VI Analysis, Key Findings and Mitigation Activities

As shown on Table 1, Milligan’s analysis indicated that six of the 30 fare media transitions yielded findings of potential disparate impact on persons protected by Title VI. These findings were based on an analysis of demographic data indicating that minority and low-income patrons use these six fare products at a disproportionately higher rate compared to non-minority and higher income patrons, and therefore are potentially more severely impacted by their transition to Clipper®-only availability. Table 1 also lists the mitigation actions MTC and the transit operators have undertaken to address these potential impacts.

While MTC and the transit operators have taken a number of steps to ensure that Clipper® is accessible to all Bay Area transit patrons, MTC staff will continue to work on the following mitigation activities:

- Conduct outreach and customer education, with a multi-lingual, multi-cultural emphasis
- Perform ongoing analysis and discussions with the Clipper® Contractor to monitor status of Clipper vendors and adjust locations, as appropriate.
- Monitor discount card enrollment opportunities and adjust as appropriate.
- Propose a card fee policy to mitigate impacts on low-income and minority customers, while addressing Clipper® operational needs.

Community Engagement

MTC plans to partner with community-based organizations (CBOs) to get feedback from low-income communities, communities of color, and persons with limited English proficiency on the proposed mitigation strategies for the Clipper® program, as well as on our general outreach strategy. While our community engagement effort is still in the planning stages, staff expects to hold focus groups in communities throughout the Bay Area. We believe focus groups – facilitated discussions with small groups of residents recruited by the CBO – are the most effective strategy to get specific feedback on the proposed mitigations. Where needed, we may supplement the focus groups with other activities, such as surveys, one-on-one interviews, etc. Initially, we will target communities already listed as Communities of Concern in MTC’s Equity Analysis, but based on our experience educating broad customer groups about Clipper®, we may tailor our outreach, adding additional groups as needed based on transit ridership rates and general geographic equity. We also would need to include the communities identified by Milligan’s analysis as having a potential disparate impact with Bay Area residents.

Community Engagement (continued)

Staff is seeking input from the Policy Advisory Council on the Report findings and possible approaches for public participation. Staff will return to the Policy Advisory Council with a summary of public input and final mitigation recommendations for the Clipper[®] Program before seeking Commission approval.

General Title VI Update

Staff last presented a Title VI briefing and a brief update on Clipper[®] Title VI evaluations to this Committee in July 2011. Recent and upcoming Title VI activities include:

- Staff participated in and moderated the July 18, 2011, Title VI working group meeting. The Title VI working group includes several transit agencies and Metropolitan Planning Organization (MPO) from throughout the state, including the Bay Area Rapid Transit District (BART), the San Francisco Municipal Transportation Agency (SFMTA), and the San Diego Association of Governments (SANDAG).
- Staff continues to monitor Title VI compliance of sub recipients of JARC/New Freedom funds.
- Human Resources staff is developing a web based Title VI and Language Assistance training program, and will provide training to all MTC staff.
- On September 21, 2011, the Federal Transit Administration (FTA) completed a Title VI compliance review of MTC. MTC expects to receive a formal report on the review findings by December of this year. Staff will return to the Policy Advisory Council with the results of the FTA compliance review.
- On September 29, 2011, the FTA issued a Notice of Availability of a proposed Circular on Environmental Justice and proposed revisions to the Title VI Circular. MTC will assist the FTA with its Informational Session regarding their Environmental Justice Circular and proposed revisions to the Title VI Circular, which will be held in the San Francisco Bay Area on November 14, 2011.

Attachments

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Table 1: Fare Media Transitions, Title VI Assessment Findings and MTC Mitigations

Date of Transition	Fare Media No Longer Issued/Accepted	Potential Disparate Impact?	Recommended Mitigation	MTC Action
AC Transit				
7/31/2010	31-day paper youth ticket	Yes – Insufficient youth outreach & enrollment locations	More targeted outreach & additional locations accepting youth applications	Supporting and funding extensive AC Transit youth outreach and enrollment activities
12/31/2010	31-day paper adult ticket	Yes – Vendor deficiency in 1 location and \$5 card fee	1 additional Clipper vendor; elimination of \$5 card fee	Added 2 Clipper vendors; MTC proposes reducing card fee to \$3 with a \$2 minimum load
12/31/2010	10-ride paper ticket (Adult)	No	N/A	N/A
12/31/2010	10-ride paper ticket (Y/S/D)	No	N/A	N/A
BART				
12/15/2010	EZ Rider smart card as transit payment	No	N/A	N/A
12/31/2011	High Value Discount magnetic stripe tickets	No	N/A	N/A
12/31/2011	Senior (green) magnetic stripe ticket	No	N/A	N/A
12/31/2011	Youth & disabled (red) magnetic stripe ticket	No	N/A	N/A
Caltrain				
1/31/2011	Full fare 8-ride paper ticket	No	N/A	N/A
1/31/2011	Discounted 8-ride paper ticket	No	N/A	N/A
3/1/2011	Full fare paper monthly pass	No	N/A	N/A
3/1/2011	Discounted paper monthly pass	No	N/A	N/A
3/1/2011	Caltrain + Muni paper monthly pass	No	N/A	N/A
TBD	Paper Go Pass	No	N/A	N/A
GGBHTD				
8/1/2010	\$25.00 Transit Value Card	No	N/A	N/A
8/1/2010	\$50.00 Transit Value Card	No	N/A	N/A
8/1/2010	\$75.00 Transit Value Card	No	N/A	N/A

Table 1 (Continued)

SFMTA				
4/15/2010	Golden Gate Ferry paper two-way transfer	No	N/A	N/A
4/30/2010	Adult Single Ride paper Ticket Book (10 rides)	No	N/A	N/A
10/4/2010	BART to Muni paper two-way transfer	No	N/A	N/A
11/1/2010	Adult Muni/BART paper Fast Pass	No	N/A	N/A
2/1/2011	Disabled Monthly Sticker	Yes – Vendor deficiency in 2 locations	2 additional Clipper vendors	One vendor in each of the 2 impacted communities are recruited with signed contracts from Cubic. Installation and training to be completed 10/19-10/21/2011
4/1/2011	Adult Muni-only paper Fast Pass	No	N/A	N/A
6/1/2011	Paper Senior Pass	No	N/A	N/A
8/1/2011	Paper Youth Pass	Yes – Insufficient enrollment locations and vendor deficiency in 2 locations	Additional locations accepting youth applications; 2 additional Clipper vendors	Support and funding for SFMTA-led outreach and enrollment activities; One vendor in each of the 2 impacted communities are recruited with signed contracts from Cubic. Installation and training to be completed 10/19-10/21/2011
TBD	BART/Daly City paper two-way transfer	Yes - \$5 card fee	Elimination of \$5 card fee or retention of transfer machines	Transition has not occurred - in discussions with SFMTA; MTC proposes reducing card fee to \$3, with a \$2 minimum load policy
TBD	Adult Single Ride Token	No	N/A	N/A
TBD	1-day, 3-day, and 7-day paper Passports	No	N/A	N/A
TBD	Paper bus transfers	Yes – Vendor deficiency, low accessibility to fare media and \$5 card fee	Retention of paper transfer; elimination of card fee; addition of Clipper vendors in several areas; expanded distribution of limited use tickets	Transition has not occurred - in discussions with SFMTA
TBD	Paper ADA transfers	No	N/A	N/A

DRAFT Title VI Summary Report
Clipper® Fare Media Transitions
Presented to the Metropolitan Transportation Commission
September 2, 2011

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I. Executive Summary

In February 2010, the Metropolitan Transportation Commission (MTC), which oversees the Clipper® smart card system, adopted MTC Resolution No. 3866, which required transit operators to convert certain specified paper fare media to Clipper.¹ Shortly after the adoption of Resolution No. 3866, Clipper staff began work to identify the appropriate steps to ensure Clipper's compliance with the regulations of Title VI of the Civil Rights Act of 1964, and determined that an assessment of the fare media conversions to Clipper would be the appropriate course of action. To ensure an independent and thorough review, MTC asked its primary Clipper project consultant, Booz Allen Hamilton (BAH), to procure the services of an experienced Title VI consultant to perform this assessment. This report provides the results of the analyses performed by that consultant, Milligan and Company (Milligan). It also provides context for the overall fare media change to Clipper and additional information on strategies MTC has employed to make the shift to Clipper as smooth as possible for all of the Bay Area's transit riders and more specifically for persons protected by Title VI.

MTC and the transit agencies are still in the process of deploying Clipper region-wide. While these analyses were being performed, the program was undergoing tremendous growth and rapid consumer adoption. Consequently, it was difficult for the individual reports for each fare media transition to reflect the latest developments to the program. This report describes the current state of the program's implementation and summarizes issues that were consistently raised in the individual reports.

Milligan analyzed the transitions of 30 fare products, and found no potential disparate impact for 24 of them. Where potential disparate impacts were found, they were related to retailer locations, the \$5 card acquisition fee, distribution of special (discount category) cards, and outreach, all of which will be discussed in the body of this report.

Before discussing the findings of the Title VI assessments, this report explains the basics of the Clipper system and provides an overview of the various ways in which the Clipper program has strived to provide equitable access to Clipper's services and benefits.

II. Background

A. Basics of the Clipper System

Clipper is a smart card system that allows transit patrons to transfer seamlessly between participating transit systems in the Bay Area. The Clipper card is reloadable and stores cash value (known as "e-cash"), tickets, and passes. It provides the ability to load from five cents to \$300 to the card at any time. Unlike most magnetic stripe tickets, the card is intended for

¹ Additional detail regarding the legal basis for Resolution No. 3866 appears in Part II.B of this report.

extended use, and it can be reloaded online, by phone, fax, or in person at retail outlets and ticket vending and add value machines.

The concept of the Clipper electronic fare payment system was created in 1999 under the brand name “TransLink[®]”. In 2003, MTC entered into a Memorandum of Understanding with the major transit operators of the Bay Area, calling for a phased deployment of the system. It underwent a pilot phase, testing, and various soft (limited) launches, before starting to garner more significant market share in 2010. Alameda-Contra Costa Transit District (AC Transit) and Golden Gate Bridge, Highway and Transportation District (GGBHTD) launched in 2006, San Francisco Municipal Transportation Agency (SFMTA) in 2008, Peninsula Joint Powers Board (Caltrain) and Bay Area Rapid Transit (BART) in 2009, San Mateo County Transit District (SamTrans) in 2010, and Santa Clara Valley Transportation Authority (VTA) in early 2011. These seven systems account for 95% of the ridership in the region.

TransLink was re-branded as Clipper on June 16, 2010 to support the official regional launch of the system. In conjunction with the launch of this new brand, a coordinated customer education campaign was initiated, which will be described in greater detail in Part III.A of this report.

The Clipper system supports the fare structures, transit products, and transfer policies already offered by each transit agency, rather than imposing a uniform fare structure across the region. In total, the system supports 4,000 unique fares, 100 fare products, and 12,000 transfer combinations. The system also supports the various payment configurations used by different transit agencies: flat fare, distance-based, and zone-based. All operators can sell each other’s agency’s fare products. In total, there are nearly 9,000 devices deployed across the region. For a description of the types of Clipper cards, see **Appendix A**.

B. Fare Media Transitions and MTC Resolution No. 3866

MTC is required by state statute to adopt rules and regulations to promote the coordination of fares and schedules for all public transit systems within its jurisdiction, to require every system to enter into a joint fare revenue sharing agreement with connecting systems, and to recommend consolidation of transit operator functions to improve transit efficiency.² Initiating and managing the Clipper program is a significant part of MTC’s efforts to comply with these statutory requirements.

MTC’s first adopted a Transit Coordination Implementation Plan (Plan) in 1998 via MTC Resolution 3055. The first Plan was largely voluntary and did not produce significant results in terms of fare coordination. Throughout the fall of 2009, MTC worked with its transit partner agencies to develop the update to the Plan, with the intention of establishing the Clipper smart card fare collection system as the foundation for fare coordination in the Region. The result of those efforts was a revised Transit Coordination Implementation Plan, MTC Resolution No. 3866, which was adopted in February 2010. (See http://www.mtc.ca.gov/planning/tcip/RES-3866_approved.pdf.) Among other requirements, Resolution No. 3866 requires transit operators

² Per California Government Code Sections 66516 and 66516.5, enacted in 1989 and 1996, respectively.

participating in the Clipper program (AC Transit, BART, Caltrain, GGBHTD, and SFMTA) to implement, operate and promote Clipper as their primary fare payment system. The Plan also identified a list of fare products that would transition to be exclusively available through Clipper. Per the Resolution, MTC declared that failure to eliminate these specified existing paper fare products and transition them to Clipper exclusively could result in sanctions, including withholding funds.

Dubbed “fare media transitions”, the Resolution put forth a schedule, negotiated with transit operators, of the dates the paper form of these products were to be eliminated. For the first five operators, the fare media transitions were set to begin in March 2010 and conclude in June 2011. The original schedule is shown in Table 1.

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Table 1: Fare Media Transition Schedule per Resolution No. 3866

Assessment Number	Date of Transition	Transit Operator	Fare Media Transition Description
1	October 1, 2010	BART	Acceptance ends of EZ Rider card as transit payment
2	August 1, 2010	SFMTA	Acceptance ends of paper Adult Muni/BART Fast Pass
3	September 30, 2010	AC Transit	Sales end of paper 31-day youth ticket
	December 31, 2010	AC Transit	Acceptance ends of paper 31-day youth ticket
3	September 30, 2010	AC Transit	Sales end of paper 31-day adult ticket
	December 31, 2010	AC Transit	Acceptance ends of paper 31-day adult ticket
4	August 1, 2010	Golden Gate Transit	Acceptance ends of \$25.00 Transit Value Card
	August 1, 2010	Golden Gate Transit	Acceptance ends of \$50.00 Transit Value Card
	August 1, 2010	Golden Gate Transit	Acceptance ends of \$75.00 Transit Value Card
5	August 1, 2010	SFMTA	Acceptance ends of paper BART two-way transfer
	August 1, 2010	SFMTA	Acceptance ends of paper BART/Daly City two-way transfer
6	September 30, 2010	AC Transit	Sales end of paper 10-ride tickets (A/Y/S/D)
	December 31, 2010	AC Transit	Acceptance ends of paper 10-ride tickets (A/Y/S/D)
7	September 30, 2010	SFMTA	Acceptance ends of paper RTC/Disabled Fast Pass
8	January 31, 2011	Caltrain	Acceptance ends of paper full fare 8-ride ticket
	January 31, 2011	Caltrain	Acceptance ends of paper discounted 8-ride ticket
9	January 31, 2011	Caltrain	Acceptance ends of paper full fare monthly pass
	January 31, 2011	Caltrain	Acceptance ends of paper discounted monthly pass
	January 31, 2011	Caltrain	Acceptance ends of paper Caltrain + Muni monthly pass
	January 31, 2011	Caltrain	Acceptance ends of paper Go Pass
10	February 1, 2011	SFMTA	Acceptance ends of paper Senior Muni-only Fast Pass
	February 1, 2011	SFMTA	Acceptance ends of paper Youth Muni-only Fast Pass
11	March 1, 2011	BART	Sales end of High Value Discount magnetic stripe tickets
	May 1, 2011	BART	Sales end of senior (green) magnetic stripe tickets
	May 1, 2011	BART	Sales end of youth & disabled (red) magnetic stripe tickets
12	April 1, 2011	SFMTA	Acceptance ends of paper Adult Muni-only Fast Pass
13	April 1, 2011	SFMTA	Sales end of Adult Single Token
14	June 30, 2011	SFMTA	Acceptance ends of paper 1-day, 3-day, and 7-day Passports
15	September 30, 2011	SFMTA	Acceptance ends of paper bus, metro/subway, and ADA transfers
16	TBD	SFMTA	Acceptance ends of paper Senior and Disabled Muni/BART Fast Passes
	TBD	SFMTA	Acceptance ends of paper Lifeline Pass
	TBD	SFMTA	Acceptance ends of paper Class Pass
17	March 30, 2010	SFMTA	Acceptance ends of paper Golden Gate Ferry Two-Way Transfer
18	April 30, 2010	SFMTA	Sales end of paper Adult Single Ride Ticket Book (10 rides)

Note that a portion of these transitions did not meet the original schedule. Some were delayed and are underway now, or are being re-examined to determine when or if they should take place.

Resolution No. 3866 did not require all fare products offered by these five transit agencies to transition to Clipper-only availability. Only fare products that were mutually agreed upon after

discussions with the transit operators are listed in the Resolution. Some paper fare products were excluded due to a higher degree of difficulty in implementing various aspects of their fare media transitions. Additionally, MTC has allowed for continued, limited distribution of paper fare media to populations for whom distribution concerns exist, on a case-by-case basis.

The fare media transition process as specified in Resolution No. 3866 has been instrumental in promoting the mass adoption of Clipper as the primary payment system for the original five participating operators. This shift has allowed these operators to begin to limit the expenditure and resources necessary to support two separate fare payment systems. Largely due to the elimination of paper fare media, the number of monthly Clipper fare payment transactions grew from under 2 million in June 2010 to over 12 million in June 2011.

Resolution No. 3866 did not specify the fare product transitions for SamTrans and VTA. Also, these systems had not launched Clipper at the time the Title VI assessment process was initiated.³ Therefore, Milligan was not asked to produce Title VI reports on the as yet to-be-determined fare media transitions for these agencies. MTC and the transit agencies are currently in the process of updating Resolution No. 3866, and part of that update involves specifying which fare products SamTrans and VTA will transition to Clipper-only availability. Therefore, the Title VI analyses of their fare media transitions will be forthcoming.

III. MTC's Initiatives to Ensure Equitable Access to Clipper

In advance of and beyond the scope of the fare media transitions and Milligan's assessments, MTC and transit agency staff have undertaken a number of initiatives intended to ensure that Title VI-protected persons have equitable access to Clipper program benefits and services. These activities fall into the categories of customer education, outreach, customer service, card and value distribution, and card policy. These are each considered in detail below.

A. Customer Education

When the Clipper brand launched in June 2010, MTC initiated a media and customer education campaign to inform transit riders about how to get and use a Clipper card. This effort included multi-lingual advertising materials (10% translated into Chinese and 10% translated into Spanish). It should be noted that most of the customer education messaging during this campaign was placed in "free space" areas on the various transit operators' systems and therefore MTC had little control over the appropriateness of the placement of linguistically-specific signage, car cards, etc.

Beginning in March 2011, MTC implemented a media campaign to specifically communicate with persons with Limited English Proficiency (LEP) about how to get and use a Clipper card. (See **Appendix B.**) Spanish- and Chinese-speaking communities were identified as the core LEP

³ The introductory language in Milligan's Title VI reports indicates that only five systems operated Clipper at the time their assessments were conducted.

communities at a regional level, while individual operators have taken responsibility for outreach to other LEP communities within their respective service areas.

Table 2 summarizes this initiative. Samples of advertising materials in Spanish and Chinese from both campaigns are attached at **Appendix C**.

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Table 2: Recent LEP Media Campaign

Type of Media	Spanish	Chinese
Print	Mix of ¼ & ½ page color insertions	Mix of ¼ & ½ page color insertions
Number of News Papers	3	2
Number of Insertions	19	13
Estimated Impressions	1,000,000	750,000
Television	30s spots targeting Adults 25-54	30s spots in Cantonese & Mandarin
Number of Channels	3	1
Number of Spots	282	60
Estimated Impressions	2,000,000	Not measured
Radio	30s spots & 15s traffic/weather sponsorship	60s spots in Cantonese & Mandarin
Number of Stations	3	3
Number of Spots	337	270
Estimated Impressions	3,000,000	Not measured
Outdoor	Advertising, eco-posters, bus shelters & vinyl clings in SF's Mission District	Wild posting, bus shelters & vinyl clings in SF's Chinatown
Estimated Impressions	800,000	75,000

B. Outreach

In addition to broader customer education activities described in Part III.A, MTC has and will continue to engage in culturally appropriate Clipper outreach 1) at a regional level and 2) through targeted collaboration with Community Based Organizations (CBOs) that work with low-income and minority communities.

1. General Outreach

In FY 2010 - 2011, MTC, with support from transit agencies, conducted approximately 800

outreach events to educate transit riders about the Clipper card; while many of these events were intended for general outreach to educate all potential Clipper customers, MTC employed outreach staff members who speak English, Spanish, Mandarin, Cantonese and other languages for events in areas that might attract monolingual non-English speakers. Activities included transit and street team events, retail support and participation in community events. MTC has also provided funding for targeted Clipper outreach by transit agencies, specifically for outreach to seniors, youth and disabled persons.

Transit and Street Team Events:

MTC concentrated outreach activities on transit stations and major transfer centers. However, outreach teams also conducted “ride-alongs” - riding on the more heavily used bus lines to reach people while they are actually on the bus. MTC included non-English speakers at events at these locations, shown in **Appendix D**.

Retail Support and Events:

MTC has leveraged several third-party distribution locations for events that provide in-person multi-lingual outreach/education services to LEP customers. In San Francisco’s Chinatown, MTC has deployed outreach staff to events at Best Food, Walgreens, Photo Focus, Hop Hing Ginseng, Ho Ho Smoke Shop, and Self-Help for the Elderly. Other retail outreach events were conducted at Sapphire Photo, TransLatina Express, and Walgreens in the Mission District, and at T&MW Market in the Tenderloin neighborhood, also in San Francisco.

Community Events:

MTC has also staffed a booth or table at the following events: Autumn Moon Festival, September 2010; Chinatown Community Street Fair, February 2011; Chinatown Community Development Center Super Sunday, March 2011; Wu Yee Children’s Services Family Resource Fair, April 2011; Oakland Cinco de Mayo Festival, May 2011; Santa Clara Cinco de Mayo Festival, May 2011; Berkeley Juneteenth Festival, June 2011; Wu Yee Children’s Services Fair, August 2011

Senior-Specific Outreach:

MTC has provided funding for SFMTA to conduct targeted outreach to seniors at senior residences, senior centers, libraries and other events where seniors congregate. A list of the locations of these events that have targeted non-English speakers (some have had multiple events) is attached at **Appendix E**.

2. Outreach through Community Based Organizations

On an agency-wide level, MTC performs numerous and ongoing equity analyses to address the needs of populations termed “Communities of Concern” and defined as areas that are either 70% minority or 30% low-income. Clipper staff in turn has utilized this same definition and has used targeted outreach to educate Communities of Concern about the Clipper program and any specific planned fare media transitions that may impact them. Staff first identifies CBOs who work with the desired communities in the targeted areas. Once partnerships are established with these CBOs, MTC staff strives to gain a better understanding of levels of awareness and knowledge of Clipper within the community; who buys transit products and plans the families’

use of transit; what appropriate messaging might be; what the barriers are to Clipper adoption; and recommended methods of removing barriers. This then translates into strategies for reaching community members.

Examples of outreach strategies implemented in FY 2010-2011 include:

- Working through local service providers: Staff works with schools, churches, senior living facilities, social service groups, etc., to identify meetings/events in which MTC can participate, or works with organizations to set up special events. Outreach staff attends meetings or events to give an overview of Clipper, distribute cards, and take applications for senior cards. Staff also provides extra materials for these providers to have on hand for their clients/members.
- Conducting outreach at local gathering places: Staff identifies locations that attract the largest number of residents of the community. This can include grocery stores that accept food stamps, community or park and recreation centers, laundromats, libraries, etc. Staff contacts these organizations to discuss displaying flyers or posters or possibly having outreach staff on-site to distribute information and cards and answer questions.
- Conducting transit events: Staff holds on-street and on-vehicle outreach activities to distribute information and cards as well as answer questions.
- Providing support at participating retailers: Staff identifies the Clipper retailers within the community and arranges to have outreach staff on hand, either in front of or inside the store to answer customers' questions, during key periods.
- Participating in community events: Staff works with the CBO partners to identify appropriate street fairs and other community celebrations, and makes arrangements to participate by having a booth, having street teams roaming the crowd, etc.
- Utilizing community-specific media: MTC also works with CBOs to identify opportunities to use free media coverage through press events, interviews, etc., to promote Clipper in general and local events specifically.

Communities that ranked high in MTC equity analyses in terms of low-income and minority populations included the Chinese community in San Francisco and the African-American and Latino communities in western Contra Costa County. MTC has formed extremely productive partnerships with CBOs and local agencies in these communities:

San Francisco Chinese Community:

MTC established partnerships with the Chinatown Community Development Center, Self-Help for the Elderly, and Wu Yee Family Services to identify and implement appropriate strategies for conducting outreach to monolingual Chinese speakers in San Francisco. These organizations have provided assistance with scheduling events at their locations, shared advice about larger community events in which Clipper should participate, identified retailers that need additional support, provided translation assistance to ensure materials are culturally competent, provided guidance regarding media buys for the foreign-language ad campaign in spring 2011, and set up opportunities for media interviews. In the case of Self-Help for the Elderly, this organization has taken an additional step of becoming a Clipper retailer at their payment center in San Francisco Chinatown and is currently planning to provide mobile services at senior centers serving non-English speakers throughout San Francisco.

West Contra Costa County African-American and Latino Communities:

Working with the West Contra Costa Transportation Advisory Committee and the West Contra Costa Unified School District, MTC has implemented a series of events designed to help low-income, minority and monolingual Spanish youths to obtain Clipper cards that can be used for AC Transit's significantly discounted youth pass.⁴

C. Customer Service

Outside of these media campaigns and outreach activities, patrons interact with the Clipper system on a recurring basis in a number of ways. Clipper's primary contractor, Cubic Transportation Systems, Inc. (Cubic) operates the Clipper Service Bureau (CSB), which delivers the majority of Clipper's customer service functions. In addition, MTC manages several other contractors who oversee and provide customer support services. In total, patrons are able to access Clipper services through the Clipper call center, website, two in-person customer service centers⁵, an extensive third-party vendor network, and transit agency ticket offices.

MTC has instructed its contractors to take steps to ensure meaningful access for LEP persons through these various customer interfaces. The call center is staffed with Cantonese, Mandarin and Spanish speaking customer service representatives, and utilizes the AT&T Language Line service, which provides interpreter service into approximately 150 languages. The Clipper website, clippercard.com, has key pages and critical forms translated into Spanish and Chinese. The two in-person customer service centers are staffed with Spanish, Cantonese and Mandarin speaking customer service representatives, and are stocked with Clipper brochures in Spanish and Chinese. Cubic distributes multi-lingual brochures to third-party vendors, and has conducted special recruitments and training of merchants in San Francisco's Chinatown. The transit agency ticket offices are also able to stock brochures in Spanish and Chinese. Some transit agencies are translating the brochures into additional languages based on their ridership needs (Russian for SFMTA and Vietnamese for VTA).

D. Card and Value Distribution

All of the customer interfaces described above allow for a patron to obtain an adult Clipper card. More specifically, patrons can obtain an adult Clipper card:

- By placing an order online, by phone, or by fax with the CSB
- By accessing a Clipper Ticket Vending Machine, located in nine Muni metro stations and three Golden Gate Ferry terminals
- By going to a Clipper in-person customer service center
- By going to transit agency ticket offices and sales kiosks
- By going to a participating Clipper retailer

⁴ As of May 2011

⁵ Two are located in downtown San Francisco; a third will open in downtown Oakland in winter 2011.

Additionally, once a patron has a card but needs to add value to the card, there are Clipper-enabled ticket vending machines in all 44 BART stations, as well as Clipper Add Value Machines that dispense products and value (but not cards) in select locations.

Several of Milligan's Title VI assessments indicated a potentially disparate impact regarding access to Clipper retailers in predominately minority and low-income areas. These assessments related to AC Transit's 31-Day ticket, and SFMTA's disabled monthly sticker, youth pass, and bus transfers. While specific mitigation activities regarding these fare products will be discussed in Part V.A, MTC's overall approach to building the Clipper retailer network is presented in greater detail here.

1. Clipper Retailer Network

Bay Area transit agencies have sold transit fare media through retailers for many years on a commission basis, and the Clipper third-party distribution network preserves that option for transit riders. While Clipper introduces other new purchasing options, such as Autoload, which is available through clippercard.com, MTC has long recognized that the third-party distribution network provides not only a continuation of a purchasing option that pre-dates Clipper, but also a purchasing option for transit riders who either cannot or choose not to use the other purchasing options. Reasons that a transit rider may not be able to use Autoload or other online purchasing options include a transit rider's not having a bank account (being "unbanked") and/or not having sufficient funds to establish a recurring automatic purchase. The locations participating in the Clipper third-party distribution network all accept cash for purchases.

MTC's contract with Cubic requires Cubic to provide 400 third-party Clipper distribution locations (e.g., Clipper vendors or retailers) at which patrons can purchase Clipper cards and load Clipper value. The contract specifies a county-by-county distribution of the locations throughout the Bay Area with the largest number of locations required in the counties with the largest numbers of transit riders, i.e. San Francisco and Alameda. The program had approximately 125 locations by November 2006, when Clipper⁶ service began on AC Transit and Golden Gate Transit and Ferry, and approximately 225 locations by June 2010. As of July 2011, Cubic is providing third-party distribution services through a network of over 330 retailers.

MTC's contract with Cubic requires deployment of retailer locations that provide unbanked segments of the population with convenient third-party locations for purchasing Clipper cards and adding Clipper value. In general, Cubic initiates its efforts to recruit Clipper distribution locations by approaching retailers that previously sold paper transit fare media. Where a transit agency has more paper ticket sales locations than the MTC-Cubic contract requires for Clipper distributors, transit agencies provide direction to Cubic concerning the optimal locations to establish Clipper distributors. Additionally, transit agency staff often direct Cubic to retailers located in low-income and minority communities as a matter of course. In conjunction with these efforts, MTC has taken additional steps to deploy third-party distribution locations in these communities:

⁶ Was actually launched under the previous name TransLink

- In 2007, MTC executed a change order to the Cubic contract to provide incentives for vendor recruitment in targeted communities. The change order provides an incentive (additional compensation to Cubic) for recruitment of specific distribution locations and/or locations in specific geographic areas. As described above, MTC works with the transit agencies to identify high priority retailers. Many of these are in low-income and minority communities. As detailed in Part V.A, MTC is utilizing this “incentive” change order to address findings of potential disparate impact in the Title VI reviews related to insufficient vendor distribution in certain communities.
- MTC has participated in discussions with transit agency staff and CBOs concerning the establishment of retail locations in key areas they jointly identified. This resulted in the successful recruitment of several distribution locations: Self Help for the Elderly, Foodvale Market in Oakland’s Fruitvale neighborhood, and Pal Market in East Palo Alto.

It is important to note that irrespective of whether MTC offers an additional financial incentive for specific locations, the ultimate decision concerning whether or not the retailer will participate in the Clipper program is up to the retailer; a retailer cannot be mandated to vend Clipper.

The Clipper vendor network is continually expanding; the most recent maps of the network are available at clippercard.com.

2. CVS Participation in Clipper Retailer Network

When Milligan was originally contracted to perform MTC’s Title VI analysis, the CVS pharmacy chain was under contract with Cubic to initiate distribution of Clipper products, and Milligan included CVS locations in its vendor mapping. Subsequent to Milligan’s completion of much of this work, Cubic’s negotiations with CVS stalled and the implementation of CVS locations did not proceed as originally planned. To ensure that Milligan’s analysis would remain intact, staff performed an analysis to determine where the absence of CVS vendors would significantly impact areas that Milligan had identified as predominately minority and low-income. This analysis revealed that generally speaking, CVS stores were not located within these areas.

However, staff identified five sites region-wide where there was an absence of a CVS vendor in a predominately minority and low-income area, and no Clipper vendors within three-quarters of a mile of that CVS store: two in Oakland, one in Richmond, and two in Santa Rosa. To rectify these gaps, MTC has offered Cubic the same incentives as described above to recruit vendors in these areas.

3. Distribution of Youth and Senior Clipper Cards

Discount category cards – youth, senior, and RTC – have eligibility requirements, and different card acquisition processes and fees than adult cards. These are discussed in detail in **Appendix A**.

Discount fare categories, specifically senior and youth, are intended to offer significant discounts for eligible patrons. However, the potential for fraudulent use is high with paper fare media, as the burden of enforcement falls to private retailers and bus or train operators. With Clipper, however, eligibility for these heavily discounted fares is centralized at the ticket offices of the participating transit agencies or at Clipper in-person customer service centers, and therefore retailers and frontline operator staff do not have to play as substantive a role in enforcement of the legitimate use of these products.

Two of Milligan's assessments of youth fare products indicate that the Clipper in-person application process adds a potentially burdensome step to obtaining these products: AC Transit's 31-Day youth ticket and SFMTA's youth pass.⁷ However, this additional step is an intentional part of the system meant to curtail abuse of discount fare categories and its implementation was requested by the transit operators. Irrespective, the benefits of expanded add-value channels for discount category patrons after the initial card acquisition process outweigh the potential burden of the application requirement. In addition, this practice serves both the program and the public interest.

E. Card Policy

1. Card Acquisition Fee

Beginning in November 2006, when Clipper (then called TransLink) began operating on all AC Transit and Golden Gate Transit and Ferry routes, the program began requiring customers to pay a \$5 fee when acquiring a TransLink Card. MTC and the participating transit operators adopted this fee as part of the Operating Rules that dictate certain program policies. The fee was adopted both to offset expenses associated with ongoing procurement of the cards and to prevent customers from abusing the card's negative balance feature. (The negative balance feature allows customers to complete a single trip even if the remaining cash balance on a card is insufficient to pay the fare required for the trip; this is a convenience feature designed to assist customers who may be in a hurry. Following a trip where the card's cash balance is negative, the customer must add value to the card before using it again.) In 2006, the system design allowed for customers to have a maximum negative balance of -\$5; the corresponding \$5 card acquisition fee effectively prevented customers from cheating the system by disposing of cards with negative balances rather than adding enough value to continue using the card.

In addition to establishing the \$5 card acquisition fee, the Operating Rules specified that the card acquisition fee does not apply to customers who set up the Autoload feature or participate in an Institutional Program, e.g. employer transit benefit programs. The Operating Rules also specified that the program would set aside about 225,000 cards for distribution to customers at no charge as part of transit operator-managed promotions.

In April 2010, MTC and the participating transit operators approved both a three month suspension of the card acquisition fee for adult cards in order to encourage transit customers to adopt the card and permanent elimination of the card acquisition fee for youth and senior cards.

⁷ Mitigation activities related to these fare products will be addressed in Part V.A.

In August 2010, MTC decided to extend suspension of the card acquisition fee through June 30, 2011 to ensure cards would remain free through the end of the major fare media transitions.

While MTC had planned to reinstate the card acquisition fee on July 1, 2011, as described in Part V.A, several of the Title VI reviews indicate that reinstatement of the \$5 card acquisition fee could present a barrier to acquiring Clipper cards for persons protected by Title VI, and the reviews recommend eliminating the fee permanently. While the reviews indicate the possibility that reinstatement of the card acquisition fee could present a barrier for certain customers, distribution of free cards to all customers since June 2010 has engendered a number of operational issues, which are described in Part III.E.2.

Taking into account both the findings of the Title VI reviews and the operational issues associated with the wide-scale distribution of free cards, MTC has approached the matter of reinstatement of the \$5 card acquisition fee carefully with the goal of identifying an approach that addresses the following objectives:

- Cover cost of the cards;
- Discourage fraudulent abuse of the negative balance feature;
- Discourage the casual disposing or loss of cards;
- Discourage hoarding of cards;
- Minimize potential barriers to adoption of Clipper; and
- Continue to support/encourage customer adoption of the Clipper card.

MTC has taken the following points under consideration as part of its deliberation about whether to reinstate the card acquisition fee:

- The fundamental premise of the Clipper card is that it is a reloadable extended use card, and the life of a card is typically 3 years or longer; a regular transit rider would likely use the card a minimum of 100 times thereby rendering the card acquisition fee a *de minimis* fee.
- Additionally, there are several legitimate business reasons for the card acquisition fee:
 1. It helps offset the cost of procuring the cards;
 2. It encourages customers to retain their cards and not treat them as disposable; and
 3. It de-incentivizes abuse of the negative balance feature.

Title VI guidance in FTA Circular 4702.1A, Chapter V.4, indicates that offsetting benefits can be taken into account when assessing any adverse effects of proposed fare changes. Use of the Clipper system meets a substantial need that is in the public interest and offers numerous benefits that improve the transit experience for all riders, regardless of race or income:

- The ability to transfer through multiple transit systems without changing fare instrument;
- The ability to load any amount onto the card (with certain restrictions), and to store cash value, thereby eliminating the need for exact change;
- Balance restoration if a registered card is lost or stolen - a feature not available with paper fare media;
- The negative balance feature described above; and
- The automatic calculation of transfers, which in the case of paid transfers eliminates the need for a customer to decide to purchase a transfer upon boarding a first vehicle that may or may

not be valid upon boarding a second vehicle depending on when the patron completes his or her journey.

2. Operational Issues and Minimum Load Requirement

Operational Issues

Since the suspension of the card fee began, the Clipper program has encountered a number of operational issues related to distributing free cards.

Fraudulent use of the cards

As described above, the Clipper system has a negative balance feature that allows customers to complete a single trip even if the remaining cash balance on a card is insufficient to pay the fare required for the trip; this is a convenience feature designed to assist customers who may be in a hurry. Following a trip where the card's cash balance is negative, the customer must add value to the card before using it again. The \$5 card acquisition fee discouraged customers from abusing this feature by disposing of cards with negative balances rather than adding enough value to continue using the card because the customers would need to pay \$5 for replacement cards. Once the program suspended the card acquisition fee, some customers began abusing the negative balance feature in the manner described above; this meant that a substantial number of customers were not paying the full fare for their trips. Media coverage of the fraud in 2010 exacerbated the problem.

Disposing and hoarding of the cards

Separate from the fraudulent use of the system, there are some patrons who dispose of or lose track of their cards but the cards may or may not have negative balances. In these instances, the customers simply acquire replacement cards at no cost to the customer, but the program bears the capital and operating expenses of providing multiple cards to a single customer. It is also possible that, due to the free card promotion, some customers are hoarding cards to be sold when the program reinstates the card acquisition fee. These types of behaviors have a negative impact on card inventory and promote inefficient use of the cards.

Financial costs and losses associated with not charging a fee for the card

Based on the program's last two card procurements, the cost of one card is \$2.22. The minimum fee to the program of distributing the card is \$1.31, which brings the total cost per distributed card to \$3.53. This is a significant expense to the Clipper program if the program continues to waive the card acquisition fee. The program's long-term budget does not include a substantial amount of funding for card procurement because the program assumed a revenue stream from card acquisition fees.

Minimum Load Requirement

After the suspension of the \$5 card fee, Clipper's primary third-party distributor - Walgreens - indicated to MTC that it was losing staff time to transactions when patrons requested free Clipper cards but did not add value on the cards. In order to address this issue, in September 2010 the Clipper program instituted a \$2 minimum load requirement for customers acquiring new Clipper cards. In other words, when a patron obtained a new card, he or she had to purchase either a pass product or load \$2 of cash value.

In November 2010, numerous media outlets published stories essentially instructing customers how to abuse the negative balance feature. Subsequently and not surprisingly, there was a dramatic increase in the number of cards with new negative balances. In December 2010, MTC and the transit operators began a process of considering a number of options for minimizing abuse of the negative balance feature. Rather than eliminate the negative balance feature, reinstate the card acquisition fee earlier than the planned reinstatement on July 1, 2011, or deploy other more complex solutions, MTC decided to increase the minimum load requirement from \$2 to \$5. MTC believed that this approach best balanced MTC's interests in facilitating access to Clipper, preserving the benefit of the negative balance feature, and deploying a solution quickly and inexpensively.

The change to increase the minimum load to \$5 went into effect on March 1, 2011. Following the implementation of a \$5 minimum load, MTC staff continued monitoring the level of negative balance abuse. Per June 2011 data, the increase in the required minimum load for new cards generally appears to be having the intended effect of reducing abuse of the negative balance feature. However, there continue to be approximately 8,000 additional cards with new negative balances each month, and the aggregate negative balance amount increases at a rate of roughly \$30,000 per month.

Reduce Card Acquisition Fee to \$3, with \$2 Minimum Load Requirement

MTC believes that as long as the Clipper card is free patrons will have little incentive to treat the card as something of value, and they will continue both to prematurely dispose of and to hoard cards. Since the suspension of the card fee in June 2010, the Clipper program has distributed over 1.1 million free cards. The sometimes wasteful manner in which these cards are being used has generated a rate of card inventory depletion that is not sustainable.

MTC now proposes reducing the card acquisition fee to \$3 and the minimum load requirement to \$2 on January 1, 2012— still a \$5 initial outlay — as a step to mitigate any potential impact on Title VI-protected individuals while balancing the operational needs of the Clipper program as a whole. MTC plans to perform targeted outreach to Title VI populations prior to the change, and MTC will only reinstate the card fee after receiving their feedback. In addition, MTC will develop a customer education initiative to coincide with reinstatement of a card acquisition fee, and MTC will work collaboratively with transit agency staff to ensure impacted customers are aware of the fee.

IV. Process of Conducting the Title VI Reviews

As previously mentioned, in order to conduct the Title VI reviews, MTC asked its primary consultant, BAH, to procure the services of a consultant with expertise in the area of Title VI. They selected Milligan to perform these analyses.

On March 18, 2010, MTC notified the general managers of each transit agency of its plan for completing these analyses of the fare media transitions, and requested their cooperation in both sharing any demographic and other relevant data with Milligan, and reviewing the documents for completeness and accuracy. (See sample letter at **Appendix F**.) In conjunction with this letter,

MTC convened a meeting on March 23, 2010 with the Title VI compliance staff and Clipper staff from each agency to define the assessment process.

MTC staff coordinated meetings with each operator individually to further explain the process of the assessment and obtain demographic data specific to each agency. Milligan then drafted reports for each agency and fare product. Each operator was given the opportunity to review the drafts of the Title VI assessments related to their agency and provide comments to MTC. In general, operator comments centered on the \$5 card fee and card acquisition challenges posed by the change in process for discount category patrons. MTC staff reviewed all comments and determined which would be included in the final assessment; all operator comments were not incorporated into the final versions of these reports. The drafts were returned to Milligan for their final review of recommended changes and completion.

Data Collection

As described above, Milligan worked with each of the five transit operators to collect any and all demographic and ridership information in their possession, which consisted mostly of passenger surveys. Milligan also relied on MTC-collected data, which was drawn primarily from the Transit Passenger Demographic Survey, an on-board passenger survey conducted region-wide in 2006. In many cases this survey was the only available data source linking demographic information to fare media usage. For general demographic information, Milligan used U.S. Census and American Community Survey data.

Methodology

The basic framework for analyzing the impacts of each fare media transition involves examining the “pre-Clipper only” scenario, and then comparing it to the post-Clipper only scenario. The analysis includes a description of the features and benefits associated with the paper version of the product, and then proceeds to describe the fare payment options available to patrons once the fare product under examination converts to Clipper-only availability.

Although the Title VI circular defines low-income as meeting the federal poverty threshold, MTC instructed Milligan to define low-income as 200% of this threshold to reflect the high cost of living in the Bay Area, consistent with how MTC defines low-income in conducting equity analyses for other agency reports and projects. MTC also instructed Milligan to conform to the service area definitions used by each transit operator.

The methodology that Milligan used for its analysis of each fare product follows the same general structure, outlined below:

- Use of operator’s fare media overall: Percentages of patrons using each product/cash
- Assessment of disproportionate impact: Use of fare instrument by income and race
- Assessment of adverse impact
 - Fare policy change: Change in value, card fee, etc.
 - Fare media change: Accessibility of vendor locations
 - Identification of census tracts within service area that are predominantly both low-income and minority
 - Comparison of proximity of access to paper fare media in those areas to proximity of access to Clipper

Milligan organized the review according to the fare products listed in MTC Resolution No. 3866, resulting in 17 reports. This was done to consolidate the analysis where possible, while still maintaining the level of detail needed to assess impacts of the fare media transitions on the end user of each fare product.

V. Findings of the Title VI Reviews

As noted earlier, out of 30 fare media transitions, Milligan found that 24 of them would not generate a potential disparate impact. These findings are presented in Table 3.

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Table 3: Fare Media Transitions, Title VI Assessment Findings, and MTC Mitigations

Date of Transition	Fare Media No Longer Issued/Accepted	Potential Disparate Impact?	Recommended Mitigation	MTC Action
AC Transit				
7/31/2010	31-day paper youth ticket	Yes – Insufficient youth outreach & enrollment locations	More targeted outreach & additional locations accepting youth applications	Supporting and funding extensive AC Transit youth outreach and enrollment activities
12/31/2010	31-day paper adult ticket	Yes – Vendor deficiency in 1 location and \$5 card fee	1 additional Clipper vendor; elimination of \$5 card fee	Added 2 Clipper vendors and reduce card fee to \$3, with a \$2 minimum load
12/31/2010	10-ride paper ticket (Adult)	No	N/A	N/A
12/31/2010	10-ride paper ticket (Y/S/D)	No	N/A	N/A
BART				
12/15/2010	EZ Rider smart card as transit payment	No	N/A	N/A
12/31/2011	High Value Discount magnetic stripe tickets	No	N/A	N/A
12/31/2011	Senior (green) magnetic stripe ticket	No	N/A	N/A
12/31/2011	Youth & disabled (red) magnetic stripe ticket	No	N/A	N/A
Caltrain				
1/31/2011	Full fare 8-ride paper ticket	No	N/A	N/A
1/31/2011	Discounted 8-ride paper ticket	No	N/A	N/A
3/1/2011	Full fare paper monthly pass	No	N/A	N/A
3/1/2011	Discounted paper monthly pass	No	N/A	N/A
3/1/2011	Caltrain + Muni paper monthly pass	No	N/A	N/A
TBD	Paper Go Pass	No	N/A	N/A
GGBHTD				
8/1/2010	\$25 Transit Value Card	No	N/A	N/A
8/1/2010	\$50 Transit Value Card	No	N/A	N/A

Date of Transition	Fare Media No Longer Issued/Accepted	Potential Disparate Impact?	Recommended Mitigation	MTC Action
8/1/2010	\$75 Transit Value Card	No	N/A	N/A
SFMTA				
4/15/2010	Golden Gate Ferry paper two-way transfer	No	N/A	N/A
4/30/2010	Adult Single Ride paper Ticket Book (10 rides)	No	N/A	N/A
10/4/2010	BART to Muni paper two-way transfer	No	N/A	N/A
11/1/2010	Adult Muni/BART paper Fast Pass	No	N/A	N/A
2/1/2011	Disabled Monthly Sticker	Yes – Vendor deficiency in 2 locations	2 additional Clipper vendors	Offered incentive to Contractor to add 2 vendors in impacted communities
4/1/2011	Adult Muni-only paper Fast Pass	No	N/A	N/A
6/1/2011	Paper Senior Pass	No	N/A	N/A
8/1/2011	Paper Youth Pass	Yes – Insufficient enrollment locations and vendor deficiency in 2 locations	Additional locations accepting youth applications; 2 additional Clipper vendors	Support and funding for SFMTA-led outreach and enrollment activities; Offered incentive to Contractor to add 2 vendors in impacted communities
TBD	BART/Daly City paper two-way transfer	Yes - \$5 card fee	Elimination of \$5 card fee or retention of transfer machines	Transition has not occurred - in discussions with SFMTA and reduce card fee to \$3, with a \$2 minimum load
TBD	Adult Single Ride Token	No	N/A	N/A
TBD	1-day, 3-day, and 7-day paper Passports	No	N/A	N/A
TBD	Paper bus transfers	Yes – Vendor deficiency, low accessibility to fare media and \$5 card fee	Retention of paper transfer; elimination of card fee; addition of Clipper vendors in several areas; expanded distribution of limited use tickets	Transition has not occurred - in discussions with SFMTA
TBD	Paper ADA transfers	No	N/A	N/A

The following is a description of the operators whose fare media transitions are listed in Table 2, as well as those with future fare media transitions, organized into three categories: operators with potential disparate impact findings, operators without potential disparate impact findings, and operators with upcoming transitions. Only those fare media transitions with potential disparate impact findings are discussed in detail.

A. Operators with Potential Disparate Impact Findings

1. Alameda-Contra Costa Transit District (AC Transit)

AC Transit defines its service area as 331 census tracts in Alameda and Contra Costa counties. Overall, the roughly 1.5 million residents of this area are 56% minority, 26% low-income, and 19% LEP.

AC Transit’s 10-ride adult ticket and 10-ride youth/senior/disabled ticket both transitioned in December 2010. Milligan’s assessments of these products did not find their transition to cause a potential disparate impact. The assessments of the 31-Day youth and adult tickets, however, did indicate a finding of potential disparate impact, as described in Table 4.

Table 4: AC Transit Fare Media Transitions with Potential Disparate Impact Findings

Fare Product	Date of Transition in Res. 3866	Actual Date of Transition	Potential Disparate Impact?	Recommended Mitigation	MTC Action
31-Day youth ticket	12/31/2010	7/31/2010	Yes – Insufficient youth outreach & enrollment locations	More targeted outreach & additional locations accepting youth applications	Supporting and funding extensive AC Transit youth outreach and enrollment activities
31-Day adult ticket	12/31/2010	12/31/2010	Yes – Vendor deficiency and \$5 card fee	1 additional Clipper vendor; elimination of \$5 card fee	2 additional Clipper vendors; MTC currently plans to reduce card fee to \$3

a. Mitigation Actions in Response to Findings

i. 31-Day Youth Ticket

As described in detail in Part III.D.3, the Clipper system centralizes eligibility verification for discount category patrons by requiring senior and youth patrons to apply for the appropriate Clipper card in order to receive their discounted fares. Due to this change in process and the fact that a disproportionate amount of low-income and minority youth use the 31-Day youth ticket, this assessment recommends more targeted outreach and enrollment locations for AC Transit’s youth patrons. However, because Milligan could not continually update its reports with real-time outreach activity, this assessment was written without the benefit of complete information regarding the outreach and enrollment activities that AC Transit conducted prior, during, and after this fare media transition. Between March 2010 and January 2011, AC Transit issued more

than 15,500 youth Clipper cards. Also, during an initial outreach phase that ended October 1, 2010, AC Transit held over 70 outreach events in Alameda and West Contra Costa counties. During this time period, the AC Transit Ticket Office, normally open Monday through Friday only, opened on one to two Saturdays per month to accommodate student and parent schedules.

A more recent initiative was launched in mid-May 2011, wherein seven youth outreach and enrollment events were conducted in Richmond. MTC has supported these efforts financially and continues to work with AC Transit staff to make sure all eligible youth are aware of and enrolled in the Clipper program. However, since AC Transit has elected to require photographs on their youth cards (a unique implementation), they ultimately bear the responsibility to ensure that they have sufficient outreach and enrollment events. In addition, AC Transit has continued limited distribution of paper youth tickets in cases where Clipper distribution concerns remain.

ii. 31-Day Adult Ticket

This assessment revealed that the 31-Day adult ticket is also used predominately by low-income and minority patrons, and changes associated with its transition to Clipper could affect these patrons disproportionately. One of these potentially adverse impacts is the change in retail availability of the product. This assessment therefore examined the vendor network to ensure sufficient distribution in predominately low-income and minority areas and recommends that an additional Clipper vendor be added in Union City. However, neither MTC nor AC Transit staff considered Union City to be a core part of AC Transit's service area due to the fact that Union City operates a separate transit system and only one AC Transit route runs through the city. Instead, AC Transit staff conducted a different vendor needs analysis, on a zip code basis, and they determined that additional Clipper vendors were needed in the 94603 zip code (East Oakland). (See GM memo attached at **Appendix G**.) In consultation with AC Transit staff, MTC staff directed Cubic to contact the three AC Transit vendors in the area and solicit their participation in Clipper's retail network. Two of the three merchants joined the network. See Part III.D.1 for previous discussion regarding strategies and challenges concerning vendor recruitment.

This assessment also recommends that MTC consider eliminating the \$5 card fee as a potential barrier for persons protected by Title VI. As noted in Part III.E, the card fee was suspended on June 16, 2010; the current proposal is to implement a \$3 fee along with a \$2 minimum load requirement. The \$5 fee was suspended throughout all of AC Transit's fare media transitions.

b. Special Considerations

A major capital improvement project that was completed during Milligan's performance of these reviews and therefore was not reflected in them was the integration of Clipper add-value capabilities into BART's existing ticket vending machines. This development favorably impacts AC Transit riders, as there are at least 15 BART stations within AC Transit's service area that now provide AC Transit e-cash riders with in-person access to Clipper value.

2. San Francisco Municipal Transportation Agency (SFMTA)

SFMTA's service area is defined as the city and county of San Francisco, which includes 176 census tracts and about 775,000 residents. Overall, this area is roughly 50% minority, 24% low-income, and 24% LEP.

The assessments of SFMTA’s Golden Gate Ferry two-way transfer, adult single ride ticket book, BART to Muni two-way transfer, adult Muni/BART Fast Pass, adult Muni-only Fast Pass, senior pass, adult single ride token, 1, 3, and 7-day passports, and ADA transfers indicated their transitions would not yield a potential disparate impact. The assessments of the remaining fare media transitions did yield a potential disparate impact finding, as described in Table 5.

Table 5: SFMTA Fare Media Transitions with Potential Disparate Impact Findings

Fare Product	Date of Transition in Res. 3866	Actual Date of Transition	Potential Disparate Impact?	Recommended Mitigation	MTC Action
BART Daly City Transfer	8/1/2010	TBD	Yes – \$5 card fee	Elimination of card fee or retention of transfer machines	In discussions with SFMTA; MTC currently plans to reduce card fee to \$3
Disabled Monthly Sticker	2/1/2011	2/1/2011	Yes – Vendor deficiency	2 additional Clipper vendors	Offered incentive to Contractor to add 2 vendors in impacted communities
Youth Pass	2/1/2011	8/1/2011	Yes – Insufficient enrollment locations and vendor deficiency	Additional locations accepting youth applications; 2 additional Clipper vendors	Support and funding for SFMTA-led outreach and enrollment activities; Offered incentive to Contractor to add 2 vendors in impacted communities
Bus Transfers	9/30/2011	TBD	Yes – Vendor deficiency/low accessibility to fare media and \$5 card fee	Retention of paper transfer; elimination of card fee; addition of Clipper vendors in several areas; expanded distribution of limited use tickets	In discussions with SFMTA; MTC currently plans to reduce card fee to \$3

a. MTC’s Actions in Response to Findings

i. *BART Daly City Transfer*

The BART Daly City transfer is a paper transfer that is accessible to BART patrons exiting the Daly City BART station. It entitles the holder to a free round-trip on two SFMTA bus routes that service the station. In its paper form, it is dispensed by machines located in the BART station.

The assessment revealed that the majority of these transfer users are minority, but not low-income. This assessment recommends the elimination of the card acquisition fee or the retention of the transfer machines in this BART station based on a study indicating that minority patrons are less likely to have banking services, and therefore would be less likely to enroll in Autoload and thus would more likely be subject to the \$5 card fee. The assessment indicates that the potential loss of savings, \$4 on a round-trip Muni ride, is significant, and if the card fee is reinstated, it recommends retention of the transfer machines so as not to require these patrons to

acquire a Clipper card to receive the transfer discount. Although MTC does not agree with the basis of this argument (given the fact that a majority of the affected patrons are higher income) and similarly does not agree with the retention of transfer machines as a viable mitigation strategy, these machines have not been removed. MTC will discuss further with SFMTA to determine the appropriate course of action.

ii. Disabled Monthly Sticker

The disabled monthly sticker, a sticker that is affixed to the Regional Transit Connection (RTC) card (see **Appendix A** for more details), is used predominately by low-income and minority patrons. Based on the vendor network analysis, this assessment recommends the addition of Clipper vendors in two areas of San Francisco: Bernal Heights and the Richmond District. As described in Part III.D.1, MTC has informed the contractor that these areas are high priority and has offered to pay an incentive if the Contractor is able to secure two additional vendors in the impacted communities.

iii. Youth Pass

SFMTA's youth pass is a monthly pass and is also used predominately by low-income and minority patrons. Similar to the AC Transit 31-Day youth ticket, this assessment recommends outreach to youth and additional locations accepting youth Clipper card applications. MTC is supporting and funding SFMTA's efforts to conduct youth outreach and provide additional locations accepting youth applications, which are not reflected in Milligan's report. Per a funding agreement executed between MTC and SFMTA, SFMTA conducted youth outreach and enrollment events throughout summer 2011, culminating in the elimination of the paper youth pass at the beginning of the 2011-12 school year.

As with the disabled monthly sticker, this assessment also recommends adding additional vendors in Bernal Heights and the Richmond District. As noted above, MTC is working with Cubic to add Clipper vendors in these locations.

iv. Bus Transfers

Bus transfers in their paper form are issued to patrons when they pay cash fare upon boarding a Muni bus. Although demographic data regarding the patrons who uses these transfers is not available, cash-paying customers are predominately low-income and minority. Due to the ubiquitous distribution of the paper bus transfer, this assessment has multiple mitigation recommendations: retention of the paper transfer; elimination of the card fee; addition of vendors in Bayview, Visitacion Valley/Crocker Amazon, Bernal Heights, and the Richmond District; and addition of limited use ticket vending machine locations. At this time, this transition is not scheduled and MTC will discuss these issues further with SFMTA to determine the appropriate course of action.

B. Operators without Potential Disparate Impact Findings

1. San Francisco Bay Area Rapid Transit District (BART)

BART defines its service area as the entire four-county area in which its stations are located: Alameda, Contra Costa, San Francisco, and San Mateo. There are 820 census tracts and roughly

3.9 million people included in this area. Overall, residents of the service area are 53% minority, 21% low-income, and 17% LEP.

BART transitioned its EZ Rider smart card as transit payment in December 2010. The High Value Discount, senior, and youth and disabled tickets are currently scheduled to transition in December 2011.

Special Considerations:

As noted above, a major capital improvement project that was completed during Milligan's performance of these reviews was the integration of Clipper add-value capabilities into BART's existing ticket vending machines. This development dramatically changed the issue of accessibility to Clipper for BART's ridership, being that the ability to add value to one's Clipper card at the point-of-use (any BART station) is the most accessible way to add value.

2. Peninsula Corridor Joint Powers Board (Caltrain)

Caltrain defines its service area as 672 census tracts located in San Francisco, San Mateo, and Santa Clara counties. This area includes about 3.1 million residents. The residents of this area are 46% minority, 18% low-income, and 21% LEP.

Although no potential disparate impact was found, MTC has determined that the addition of one Clipper vendor within a ¼ mile of the Redwood City station would be desirable to fill the gap caused by the loss of CVS as a potential Clipper vendor. MTC is working with Cubic to determine the feasibility of making this addition.

Caltrain transitioned its full fare and discounted 8-ride tickets in January 2011. It transitioned its monthly passes in March 2011. Its Go Pass has not transitioned yet, as there are technical aspects of the product requiring additional implementation on Clipper.

3. Golden Gate Bridge, Highway and Transportation District (GGBHTD)

GGBHTD defines its service area as 90 census tracts located in Sonoma and Marin counties. There are 467,031 residents in this area. This population is 19% minority, 18% low-income, and 10% LEP.

GGBHTD transitioned its \$25, \$50, and \$75 transit value cards in August 2010.

C. Operators with Upcoming Fare Media Transitions

1. Santa Clara Valley Transportation Authority (VTA)

VTA began accepting Clipper on February 16, 2011. MTC and VTA are now in the process of determining which paper fare products will be transitioning to Clipper-only availability. Therefore, Milligan was not asked to produce a Title VI analysis report on the elimination of

VTA's fare media. Instead, MTC will work on this analysis in the coming months. The analysis will be appended to this report.

2. San Mateo County Transit District (SamTrans)

SamTrans began accepting Clipper on December 16, 2010, and will be completing its fare media transition process as of December 31, 2011. Milligan was not asked to produce a Title VI analysis report on the elimination of SamTrans's fare media, as the specifics of the transitions were not determined during the time of Milligan's engagement. MTC is currently working on this analysis. The analysis will be appended to this report.

VI. Conclusion and Next Steps

MTC and the transit operators have taken a number of steps to ensure that Clipper is accessible to all Bay Area transit patrons, from the general (all of the initiatives outlined in Part III) to the specific (mitigation activities in response to Milligan's Title VI reports). MTC is committed to continuing both of these fronts, by proactively doing the following:

- Continuing outreach and customer education, with a multi-lingual, multi-cultural emphasis
- Ongoing analysis and discussions with the Clipper Contractor to adjust locations of future Clipper vendors and other distributors
- Title VI impact analysis of the fare media transitions for SamTrans and VTA

The Clipper system is dynamic and requires ongoing maintenance, planning, and fine-tuning. Going forward, impacts of these processes on persons protected by Title VI will be given continued full consideration.

VII. Appendices

Appendix A

Types of Clipper Cards

Adult

This is the standard full fare category applicable to the majority of riders. Prior to the launch of the Clipper brand on June 16, 2010, the fee for this type of card was \$5; the fee was suspended in conjunction with the launch. MTC is proposing to reinstate a reduced card acquisition fee of \$3 on January 1, 2012, along with a \$2 minimum load requirement. To date, the Clipper program has distributed over 1.1 million free adult cards.

The \$5 fee is not charged when a patron registers his or her card for Autoload. Autoload allows a patron to link his or her Clipper card account to a credit card or bank account so that it is automatically replenished with value every time it reaches a minimum threshold: in the case of e-cash, this minimum is \$10, and in the case of monthly passes and tickets, value replenishment occurs when the pass or ticket expires or exhausts its value.

Youth

This card provides significantly discounted fares for youth; the eligible age range varies by transit operator. To obtain a youth card, a youth or his or her guardian must apply for the card in person at select locations in each transit operator's service area. Upon submitting the application, most youth will receive the card after several weeks; however, at several of the locations, instant issuance of the youth card is available. Also, there are specific provisions for use by AC Transit patrons.

Senior

This card provides significantly discounted fares for patrons aged 65 and up. To obtain a senior card, a patron must apply for the card in person at select locations in each transit operator's service area. Like the youth card, the card is generally mailed to the patron several weeks after submission of his or her application, but at several locations, instant issuance is possible. Eligible age range varies by operator.

RTC (Senior and Disabled)

The Regional Transit Connection program is a Bay Area wide program that provides disabled and senior transit patrons with discounted fares. BART manages a contract with a private entity, Cordoba Corporation, which handles the administration of the program by processing eligibility verification and issuing the fare payment instrument. The RTC card expires every three years and must be renewed. (When DMV documentation is provided to demonstrate eligibility, the card expires after two years.)

Before Clipper, Cordoba issued the RTC Discount ID card, which patrons affixed a discount sticker to and used as a flash pass. The card also functioned as proof of eligibility for discounted cash fares, enforced at the point-of-use. Upon initiation of the RTC Clipper card program, when

patrons renewed their RTC eligibility, they received an RTC Clipper card as the replacement fare instrument. This initiative began in 2007; by summer 2010, 100% of the approximately 90,000 participants in the program had been converted to the Clipper form of the RTC card.

The RTC Clipper card costs patrons \$3. However, this is not a change from the RTC Discount ID program. Also, when existing RTC Discount ID holders renew their eligibility and receive an RTC Clipper card, the fee is waived. The fee helps offset Cordoba's administrative costs.

In addition, the application process for the RTC Clipper card has not changed from the process to obtain the RTC Discount ID card. Patrons must apply in person at any of 16 participating transit ticket offices in the region, and their photo must be taken. The card is then sent to the patron within 3 weeks of submission of the application.

Limited Use Tickets

Clipper limited use tickets are low-value, temporary fare media that utilize smart card technology. They are intended to be used by the occasional rider and tourist. They expire after 90 days and can be reloaded, but only with the fare product that they were initially loaded with. Currently, only two transit operators issue limited use tickets – SFMTA and Golden Gate Ferry. The only products supported by the limited use tickets are one way and round trip fares on SFMTA and Golden Gate Ferry. They are available at ticket vending machines located in the 9 Muni metro stations, and at the Golden Gate Ferry terminal locations.

Appendix B

Spanish and Chinese Media Plan

MTC-ClipperSM
Communities of Concern
Media Recommendation

February 8, 2011

S W I R L





Plan Recommendation: Spanish

Spanish Newspaper

- * El Mensajero
 - » A community paper providing useful and entertaining information to the Spanish-speaking market. Around the Bay Area section (*En la bahia*) is a synergistic environment for ClipperSM.
 - » Circulation: 104,000
 - » Published/Format: Sunday/Tabloid
- * El Reportero
 - » Is a true bi-lingual newspaper committed to sports, culture, entertainment and events that help shape Hispanic Americans within the San Francisco Bay Area.
 - » Circulation: 20,000
 - » Published:/Format: Wednesday/Tabloid
- * El Observador
 - » Prides itself on educating Latin Americans who are innovative, creative and capable of becoming leaders in the community.
 - » Circulation: 40,000
 - » Published/Format: Friday/Tabloid
- * Buy Details:
 - » Mix of ¼ & ½ page color insertions
 - » Run-of-paper & premium sections
 - » Distributed: San Francisco, South San Francisco, East Bay, South Bay & Peninsula
- * Est. # of Insertions: 19
- * Est. # of Impressions: 1,001,402
- * Spend: \$28,851



Spanish Television

- * KDTV- channel 14 (Univision)
 - » Ranked #1 Spanish language in all demographics across all day-parts
- * KFSF- channel 66 (Telefutura)
 - » Ranked #2 Spanish language with A25-54 in some day- parts
- * KSTS- channel 49 (Telemundo)
 - » Ranked #2 Spanish language with A25-54 in some day- parts
- * Buy Details:
 - » Mix of day-parts (early morning, early news, prime, late news & weekend)
 - » Purchase specific programs with higher viewership (e.g. News , Sports & Novellas)
 - » Adults 25-54 primary target
 - » :30s spots

- * Est. # of Spots & GRPs: 282 spots/325 GRPs
- * Est. # of Impressions: 2,031,250
- * Flight Length: 5 weeks
- * Spend: \$52,833



Spanish Radio

- * KSOL- 98.9 FM (Univision)
 - » Mexican Regional format
 - » Ranked #1 Adults 25-54, M-F 6a-7p
- * KBRG- 100.3 FM (Univision)
 - » Recuerdo Spanish Adult Classic Hits format
 - » Ranked #2 Adults 25-54, M-F 6a-7p
- * KRZZ- 93.3 FM (Spanish Broadcasting System)
 - » La Raza Mexican Regional format
 - » Ranked #3 Adults 25-54, M-F 6a-7p
- * Buy Details:
 - » Mix of day-parts (AM drive, mid-day, PM drive, evening & weekend)
 - » Targeted shows & radio personalities
 - » Adults 25-54 primary target
 - » Combined coverage reaches broader San Francisco Bay Area
 - » :30s spots & :15s news/weather/traffic sponsorships
- * Est. # of Spots & GRPs: 337 spots/450 GRPs
- * Est. # of Impressions: 2,986,650
- * Flight Length: 6 weeks
- * Spend: \$52,833



Spanish Outdoor

- * Harrison s/o 17th St, North-facing wall unit
 - » 12,650 Daily Estimated Circulation
 - » 24'x 24'
- * Eco Posters
 - » Targeted to the Mission district
 - » 4 locations
 - » Exposed to car and foot traffic
- * Bus Shelters
 - » Targeted to the Mission district
 - » 5 units
- * Vinyl Clings
 - » 11" x 17" posters displayed in storefronts of community retailers including, but not limited to grocery stores, restaurants and cafes, laundry mats, bars, community centers, and any additional locations that have heavy traffic from the targeted community
 - » Exact locations TBD
- * Est. # of Impressions: 779,300 (not including vinyl clings- format not measured)
- * Flight Length: 13 weeks
- * Spend: \$26,541



Spanish Outdoor (cont.)

- * Bus Shelters are in blue
- * Ecoposter (30-sheets) & Wall units are in red
- * Vinyl Cling locations are TBD; general area is circled





Plan Recommendation: Chinese

Chinese Newspaper

- * World Journal / Chinese Daily SF
 - » International paper that focuses on international & local San Francisco information including consumer, finance, entertainment and home/living/health that affects Chinese Americans here and abroad.
 - » Circulation: 65-75,000 (dependant on day of week)
 - » Published/Format: M-Su/Tabloid
- * Sing Tao Daily
 - » Hong Kong's second largest Chinese newspaper provides readers with local, national and international news. Editorial ranges from entertainment & sports to business & finance.
 - » Circulation: 40-45,000 (dependant on day of week)
 - » Published/Format: M-Su/Broadsheet
- * Buy Details:
 - » Mix of ¼ & ½ page color insertions
 - » Run-of-paper & premium sections
 - » Distribution: San Francisco, South San Francisco, East Bay, South Bay & Peninsula

- * Est. # of Insertions: 13
- * Est. # of Impressions: 750,000
- * Spend: \$18,498



Chinese Television

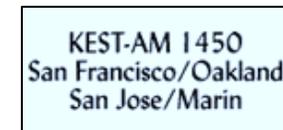
- * KTSF- Channel 26/Cable 8 (Independent Station)
 - » Known as “The Face of The Bay” is the largest Asian-language broadcast station in the US
- * Buy Details:
 - » Mix of day-parts (early morning, early news, prime, late news & weekend)
 - » Purchase specific programs with higher viewership
 - » Cantonese & Mandarin
 - » :30s spots

- * Est. # of Spots: 60 spots
- * Est. # of Impressions: N/A (not measured)
- * Flight Length: 5 weeks
- * Spend: \$27,517



Chinese Radio

- * KVTO- 1400 AM (Inner City Broadcasting)
 - » “The Voice of the Orient”
 - » World Ethnic /Talk format
- * KEST- 1450 AM (Multicultural Broadcasting)
 - » “Personal Growth Radio”
 - » World Ethnic /Talk format
- * KSQQ- 96.1 FM (Coyote Communications)
 - » “Ethnic Voice”
 - » World Ethnic /Talk format
- * Buy Details:
 - » Day-parts based on programming language
 - » Cantonese & Mandarin
 - » Combined coverage reaches broader San Francisco Bay Area
 - » :60s spots
- * Est. # of Spots: 270
- * Est. # of Impression: N/A stations not measured
- * Flight Length: 6 weeks
- * Spend: \$23,865



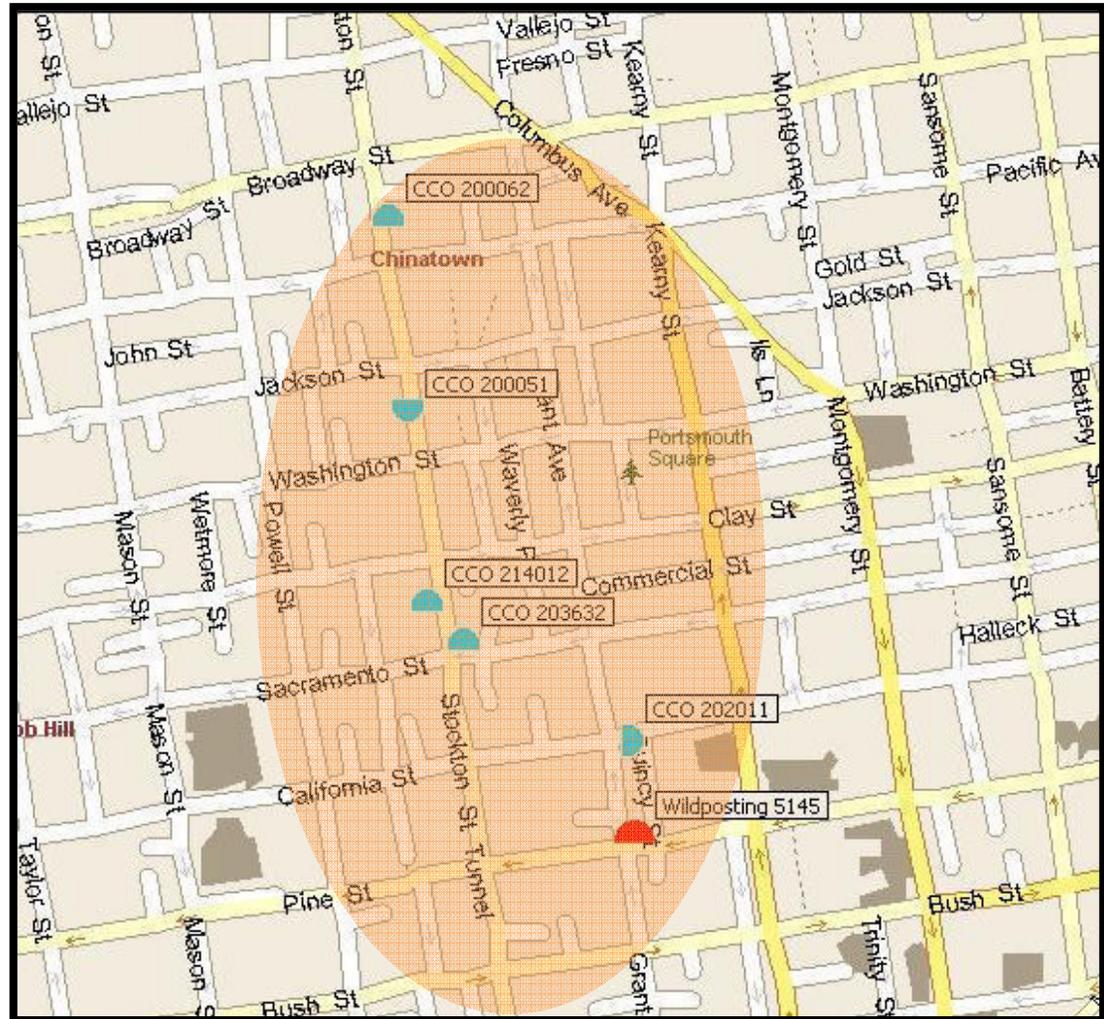
Chinese Outdoor

- * Wild Posting
 - » At the corner of Grant St. & Pine St.
 - » 6.83'h x 28.5'w
- * Bus Shelters
 - » In Chinatown
 - » 5 units
- * Vinyl Clings
 - » 11" x 17" posters in the front windows of laundry mats, stores, restaurants, etc. in the Mission
 - » Exact locations TBD
- * Est. # of Impressions: 72,800 (not including wild posting or vinyl clings)
- * Flight Length: 10 weeks
- * Spend: \$29,447



Chinese Outdoor (cont.)

- * Bus shelters are in blue
- * Wild Posting is in red
- * Vinyl Cling locations are TBD; general area is circled



Appendix C

Samples of Clipper Advertising in Chinese and Spanish

1. Car Card – Chinese
2. Car Card – Spanish
3. Ad in World Journal – Chinese
4. Ad in El Mensajero – Spanish
5. Bus Shelter Ad – Chinese
6. Bus Shelter Ad – Spanish

八方交通聚一卡

▶▶ Clipper 乃一體化規格的可增值交通卡，管理您的通票、車費及轉乘費，令您高枕無憂。
欲瞭解詳情，請致電 877.878.8883 或瀏覽 clippercard.com。



▶ MUNI

▶ BART

▶ AC TRANSIT

▶ CALTRAIN

▶ GOLDEN GATE TRANSIT AND FERRY

TODOS SUS MEDIOS DE TRANSPORTE EN UNA SOLA TARJETA.



Clipper es la tarjeta de medios de transporte completa y recargable que administra sus pases, sus tarifas y sus transbordos para que usted no tenga que hacerlo. Para obtener más información, llame al 877.878.8883 o visite clippercard.com.



- ▶ MUNI
- ▶ BART
- ▶ AC TRANSIT
- ▶ CALTRAIN
- ▶ GOLDEN GATE TRANSIT AND FERRY

CLIPPERSM ES LA NUEVA MANERA DE VIAJAR EN TRANSPORTE PÚBLICO.

▶▶ Clipper es una tarjeta de tránsito “todo-en-una” que guarda la cuenta de todos sus pases, boletos de descuento o valor en efectivo.

Paso #1: Cómprala

Tarjetas Clipper se pueden comprar en Walgreens, distribuidores autorizados, o visite www.clippercard.com

Paso #2: Agregue Saldo

Añada valor en efectivo, compre pases y libros de boletos para el transporte público en cualquier Walgreens, distribuidores autorizados y en www.clippercard.com

Paso #3: Úsela

Toque su tarjeta al lector Clipper localizados en Muni, BART, AC Transit, VTA, SamTrans, Golden Gate Transit and Ferry y Caltrain. Espere el “BIP” y la “LUZ VERDE,” y retire la tarjeta. ¡Ya está!

Eso es todo. La tarjeta Clipper es su comprobante de pago durante el viaje.

Atención personas mayores y jóvenes:

Para ordenar su tarjeta Clipper y obtener su descuento, deben llenar una solicitud y mostrar comprobante de edad.



CLIPPERSM (路路通) 卡是一個乘搭公共 交通工具的新方式。



Clipper (路路通) 卡是可乘搭各類公共交通工具的混合卡，它可以存下你所有的乘車證，折扣票，或現金值。

第一步：獲取：(如何獲得 Clipper (路路通) 卡)

Clipper (路路通) 卡可在各 Walgreens，認可零售處，和 www.clippercard.com 購買。

第二步：增值：(如何為 Clipper (路路通) 卡增值)

你可到各 Walgreens，認可零售處，和 www.clippercard.com 為你的 Clipper (路路通) 卡增值，購買乘車證和通行票。

第三步：使用：(如何使用 Clipper (路路通) 卡)

只需要將 Clipper (路路通) 卡平置於 Muni (三藩市公車)，BART (灣區捷運)，AC Transit (東灣公車)，VTA (聖他克拉谷交通局)，SamTrans (聖馬刁公車)，Caltrain (加州火車) 及 Golden Gate Transit and Ferry (公車/金門渡輪) 都有設置的讀咭器上，直至聽到“嗶”聲和綠燈亮起，便可取回。完成！

就是這麼簡單。乘搭交通工具時，Clipper (路路通) 卡就是你的付款證明。

長者及青少年請注意：

如要申請長者及青少年 Clipper (路路通) 卡折扣，申請人需填寫申請表及出示適當身份證明。



如需要查找你附近的 Clipper (路路通) 卡辦事處，請電 1.877.878.8883 或瀏覽 www.clippercard.com

一張乘搭 各類公共交 通工具的 混合卡。



ClipperSM (路路通) 卡是可乘搭 Muni (三藩市公車), BART (灣區捷運), 和其他公共交通工具的混合卡。

今日就到各 Walgreens, 認可零售處, 和 www.clippercard.com 購買你的 Clipper (路路通) 卡。

請電 1.877.878.8883。提供華語顧客服務。



TODO TU TRANPORTE PÚBLICO EN UNA TARJETA



Clipper™ es una tarjeta “todo-en-una” que te permitirá viajar en Muni, BART y otras agencias de transporte público.

Compra Clipper hoy en Walgreens, distribuidores autorizados y en www.clippercard.com

Llama al 1.877.878.8883 para servicio en español.



Appendix D

Street Team Event Locations

- 24th St. BART
- 16th St. BART
- Fruitvale BART
- Hayward BART
- Fremont BART
- Embarcadero BART
- Montgomery BART
- Powell BART
- Civic Center BART
- Concord BART
- Daly City BART
- Muni Rt. 5 Fulton
- Muni Rt. 8X/8AX Bayshore
- Muni Rt. 9 San Bruno
- Muni Rt. 14 Mission
- Muni Rt. 19 Polk
- Muni Rt. 21 Hayes
- Muni Rt. 22 Fillmore
- Muni Rt. 24 Divisadero
- Muni Rt. 28 19th Avenue
- Muni Rt. 29 Sunset
- Muni Rt. 30 Stockton
- Muni Rt. 31 Balboa
- Muni Rt. 38 AB X
- Muni Rt. 47 Van Ness
- Muni Rt. 49 Van Ness – Mission
- Muni Rt. 54 Felton
- Muni T-Third
- Muni N-Judah
- Muni F-Balboa
- San Rafael Transit Center
- AC Transit Route 1
- AC Transit Route 51A/B
- AC Transit Route 72/72M
- AC Transit stops at 14th and Broadway, Oakland
- 19th St/Holloway Street Team
- 3rd and Stevenson Street Team
- Mission and Geneva Street Team
- Stockton and Columbus Street Team
- City College Street Team

Appendix E

Senior Outreach Locations

- 30th Street Senior Center
- Alexis Apartments
- Catholic Charities/OMI Senior Center
- Ceatrice Polite
- Central Latino Senior Center
- China Town Library
- Chinatown Community Tenants Association
- Clementina Towers
- Cumberland Presbyterian Chinese Church
- Curran House
- Curry Senior Center
- DAC/Latino Partnership with ADRC-Mini Connect
- Dorothy Day SC (Mercy)
- Eastern Park Apts
- Eugene Coleman Center
- Excelsior Senior Center
- Francis of Assisi Community
- Geen Mun Senior Center
- Jackie Chan Senior Center
- Kimochi
- Lady Shaw Senior Center
- Lassen Apartments
- Manilatown Senior Center
- Maria Manor
- Mei Lun Yuen
- Mendelssohn House Residence
- Mendelssohn House Senior Center
- Menorah Park
- Mercy Terrace
- Mission Creek Senior Residence
- Mission Creek/Senior University (SAN)
- NCPHS Community Services
- Park Sunset Apartments
- Parkview Terraces
- Planning for Elders/Bayanihan Center/SAN
- Presentation Senior Community
- Rosa Parks Apartment/NCPHS
- Salvation Army
- Senior Action Network

- SF Senior Center
- Silvercrest. Residence
- Soma Family Apartments
- South Sunset Senior Center
- St. Mary's Medical Center
- SWISH
- Visitacion Valley Senior Center
- Western Park Apt
- Woolf House Apartment Building
- Woolf House Senior Center
- YWCA Apartments

Appendix F

Sample Letter to General Managers re: Title VI Assessment Project



**METROPOLITAN
TRANSPORTATION
COMMISSION**

Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607-4700
TEL 510.817.5700
TTY/TDD 510.817.5769
FAX 510.817.5848
E-MAIL info@mtc.ca.gov
WEB www.mtc.ca.gov

March 18, 2010

Scott Haggerty, Chair
Alameda County

Adrienne J. Tissier, Vice Chair
San Mateo County

Tom Azumbrado
U.S. Department of Housing
and Urban Development

Tom Bates
Cities of Alameda County

Dean J. Chu
Cities of Santa Clara County

Dave Cortese
Association of Bay Area Governments

Chris Daly
City and County of San Francisco

Bill Dodd
Napa County and Cities

Dorene M. Giacopini
U.S. Department of Transportation

Federal D. Glover
Contra Costa County

Anne W. Halsted
San Francisco Bay Conservation
and Development Commission

Steve Kinsey
Marin County and Cities

Sue Lempert
Cities of San Mateo County

Jake Mackenzie
Sonoma County and Cities

Jon Rubin
San Francisco Mayor's Appointee

Bijan Sartipi
State Business, Transportation
and Housing Agency

James P. Spring
Solano County and Cities

Amy Rein Worth
Cities of Contra Costa County

Ken Yeager
Santa Clara County

Steve Heminger
Executive Director

Ann Flemer
Deputy Executive Director, Policy

Andrew B. Fremier
Deputy Executive Director, Operations

Ms. Dorothy Dugger
General Manager
San Francisco Bay Area Rapid Transit District
P.O. Box 12688
Oakland, CA 94604-2688

Dear Ms. Dugger:

The Metropolitan Transportation Commission adopted Resolution 3866 on February 24. As you know, this resolution identifies specific fare media by operator to transition to smart card only availability. The TransLink[®]/ClipperSM program is funded in part by the Federal Transit Administration (FTA). Chapter V-4 of FTA Circular 4720.1A, "Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients" requires the evaluation of the impact of fare changes on minority and low-income populations. Although the requirements of Chapter V are the responsibility of transit operators, MTC intends to conduct a Title VI evaluation under Chapter V-4, to determine whether the fare media transitions required by Resolution 3866 are "fare changes" and if so, to ensure that the transitions will not result in adverse or discriminatory impacts on the communities of concern identified in Title VI. After the evaluations are completed, we plan to present the evaluation results and any necessary mitigations to MTC's Operations Committee.

In order to ensure that the final product is an effort the operators can endorse, we intend to work with all the operators to ensure its thoroughness and credibility. You are probably aware that Title VI evaluations are data driven. Census or other data which shows the demographics of a transit agency's service area, and surveys or other sources which show the demographics of a transit agency's actual ridership, are often fundamental to a Title VI evaluation. Assistance from your agency staff, such as providing information about your agency's ridership demographics, will almost certainly be required to properly carry out the Title VI evaluations. I ask that you direct your staff to promptly cooperate with any request from MTC for information related to the Title VI evaluations. MTC staff is convening a meeting with transit agency fare media transition liaisons and Title VI compliance officers to discuss this on Tuesday, March 23, 2010 at 2 PM here at MTC; the names of the persons MTC understands fill these respective positions are attached to this letter. Please feel free to recommend to us other staff you would like to join us in this meeting.

Since several transit agencies have fare media products that are transitioning to TransLink[®]/ClipperSM in the next few months, time is of the essence to do the needed work. MTC expects to engage a consultant to assist with these evaluations, and plans to get this support under contract quickly.

Dorothy Dugger

Page 2

The TransLink[®]/ClipperSM program is on the cusp of unprecedented growth and patron acceptance. I ask for your assistance in seeing that these evaluations of planned fare media transitions are viewed not as another hurdle to the wider use of TransLink[®]/ClipperSM, but as a way to ensure the populations protected by Title VI can enjoy the benefits of the program.

Sincerely,

A black rectangular box containing a white handwritten signature that reads "Andrew B. Fremier".

Andrew B. Fremier
Deputy Executive Director, Operations

Invited Staff
Title VI Kick-off Meeting

Agency	Fare Media Transition Staff	Title VI Staff
AC Transit	Ken Rhodes	Tina Spencer
BART	Larry Kozimor	Wayne Wong
Caltrain	Janet McGovern	TBD
Golden Gate Transit and Ferry	Barbara Vincent	Harvey Katz
SFMTA	Diana Hammons	Kathleen Sakelaris

Appendix G

AC Transit GM Memo re: Elimination of Paper Fare Media

AC TRANSIT DISTRICT
Board of Directors
Executive Summary

GM Memo No. 10-125b

Meeting Date: September 1, 2010

Committees:

Planning Committee
External Affairs Committee
Rider Complaint Committee
Board of Directors

Finance and Audit Committee
Operations Committee
Paratransit Committee
Financing Corporation

SUBJECT: Setting the End Date for the Sale of the 31 Day Local Adult, 10 Ride Local Adult and 10 Ride Youth/Senior/Disabled Magnetic Strip Passes to be October 31, 2010 and Set the Last Use Date of the Passes to be December 31, 2010.

RECOMMENDED ACTION:

Information Only Briefing Item Recommended Motion

Consider Setting the End Date for the Sale of the 31 Day Local Adult, 10 Ride Local Adult and 10 Ride Youth/Senior/Disabled Magnetic Strip Passes to be October 31, 2010 and Set the Last Use Date of the Passes to be December 31, 2010.

At the Operations Committee meeting on June 9, 2010, the members requested that the memo be forwarded to the Board, and that it be updated to include a report on the progress of the transition of the Youth Pass to Translink/Clipper, as well as maps of the current vendors and Translink/Clipper vendors.

At the July 14, 2010 Board meeting, the Board delayed action on this item until the review of MTC's Title VI Assessment was completed and reviewed by staff. New information regarding the assessment is contained in the memo in bold type.

Fiscal Impact:

None as a result of this report. Failure to achieve the elimination of magnetic strip fare media at retail by **October 31, 2010** may impact the TDA funding for the coming fiscal year and beyond.

Background/Discussion:

AC Transit submitted a fare media transition plan to MTC in July 2009. The transition plan states that all magnetic strip fare media sold at retail will be transitioned to TransLink / Clipper no later than September of 2010. **However, due to a delay in the MTC Title VI assessment, that date has been pushed to October 31, 2010.**

During the past 12 months, TransLink usage on AC Transit has increased to over 18,000 boardings per day. Further increases in passenger usage are anticipated as youth and adult local riders transition. As seen with the transbay riders, much of the transition to the TransLink / Clipper card will only occur once the current magnetic strip tickets are no longer available.

To prepare for the final media transition to the TransLink / Clipper fare card, significant effort has been made by AC Transit to understand customer issues and address those issues as they arise:

- A public meeting in San Francisco to hear feedback from transbay riders prior to elimination of transbay magnetic strip fare media
- The elimination of transbay 31 day and 10 ride magnetic strip tickets
- The addition of Walgreens as a retailer for TransLink / Clipper cards and value
- Outreach to schools and parent / teacher groups to let parents know about TransLink for youth
- Decision to raise the youth eligibility age to include the 18th year for students
- The decision to eliminate youth 31 day magnetic strip passes
- The addition of CVS pharmacy as a TransLink / Clipper retailer

Based on prior discussions with the Board regarding outreach efforts to understand issues and concerns with TransLink, no public meeting is recommended or planned for this change to the fare media used by AC Transit.

This memo will address the current program status, the transition from TransLink to Clipper, the Title VI assessment. It will also address outreach plans to assure that the information about all of these changes reach our patrons.

Current Program Status:

1. **The transition from TransLink to Clipper was completed on June 16, 2010**
2. TransLink / Clipper Customer Service office at the Service Bureau continues to meet the performance criteria (report attached)
3. **Youth Outreach Update:**
 - **As of August 26, 2010, over 6,500 youth cards have been issued. Over 100 additional card applications are being taken by the ticket office every day**
 - **The ticket office was open Saturday July 24 and Saturday, August 28**
 - **Over 55 outreach events have been completed**
 - **Additionally, staff continues to work with social service agencies and schools to determine additional opportunities to register youth for TransLink / Clipper.**
4. **MTC's vendor, the Clipper Customer Service office, continues to add staff to address growing card and customer volumes. The service center had been keeping up with demand, but slipped in the last six to eight weeks due to increases in volume driven by the SFMTA transitions.**
5. The last day to purchase a Youth 31 day local magnetic strip pass is June 30th
6. An in-person card replacement location is currently being established in San Francisco. Timeline is fall / winter 2010.
7. On-line value and usage information is now available on the TransLink / Clipper website

Title VI Review:

The MTC is conducting a regional Title VI assessment for the TransLink/Clipper transitions to assess disparate impacts to minority/low income populations and determine any mitigation measures that would be necessary.

The assessment for the AC Transit adult pass transition includes analysis for the rider populations that would be impacted by the change as well as an analysis of vendor locations to ensure that there will be similar access to Clipper vendors compared to current AC Transit pass vendors. To assess impacts to riders, MTC's consultants used data from the District's 2008 on-board survey, which will be presented to the AC Transit Board in October.

Based on the Title VI assessment of the Clipper transition, MTC's consultants suggest that there may be disparate impacts to low income and minority rider populations. As a result, MTC staff and District staff will be developing strategies to ensure that the disparate impacts can be successfully mitigated. AC Transit has previously suggested that continuing the free Clipper card would be an appropriate mitigation and will be advocating that with MTC staff. If there is a problem negotiating mitigations, staff will bring this back to the Board.

Additionally, as a result of the vendor analysis, there may be some areas in the outer sections of the District that will require further vendor recruitment. Based on input from the Board at the July 14th meeting, MTC has also directed Cubic to find vendors in inner East Oakland. However, based on the vendor analysis that reviewed access to vendors within a ¼ to ¾ mile radius, there were enough vendors in that area to mitigate any impact on access.

Vendor Analysis:

The TransLink / Clipper network is not an exact match to the current network, but with the addition of the CVS Pharmacy stores (previously Longs Drugs) the ability to access AC Transit passes is very good. Currently there are about 130 vendors selling AC Transit fare media; most, but not all of them are retail outlets. The TransLink / Clipper implementation plan originally committed to locating 75 vendors (currently there are 73) for the AC Transit implementation, but with the addition of CVS Pharmacy in the coming months, there will be 115 vendors. In addition to the "on the street" network, customers can also add value on TransLink via the telephone, the internet or using Autoload.

The marketing staff performed a very specific analysis of the vendor network (Attachment 4) by zip code. This analysis is intended to identify gaps in the vendor network that need to be addressed. Information is included to compare current and future coverage by zip code, by city and by district ward.

In summary, the zip codes below may warrant further attention because there will be at least two fewer vendors in these areas than there are today, or, in two cases, there will be no

Translink/Clipper vendors. Staff is already working with staff from MTC and Clipper to try and address these gaps.

Zip Codes with at least two Fewer Clipper Vendors than the current network (or no Clipper vendors)

City	Zip	Current	Future
Fremont	94536	4	1
Union City	94587	3	1
Oakland	94601	6	4
Oakland	94603	3	0
Oakland	94612	9	4
Berkeley	94703	4	1
San Lorenzo	94580	1	0

On the other hand, in several zip codes there will be more vendors than the current AC Transit network; below is a list of those areas in which there will be at least two more vendors.

City	Zip	Current	Future
Hayward	94544	3	6
Hayward	94545	0	1
San Pablo	94806	2	6
El Sobrante	94803	0	1
Fremont	94555	0	1

In response to a specific question, staff determined that the City of Richmond has an equal number of vendors to the current network and San Pablo has 4 additional TransLink / Clipper vendors. **The contractor has contacted the two social service agencies that were recommended as possible vendors; as of August 26, 2010, neither of these two agencies has joined the program. The contractor continues to follow up.**

The ClipperCard contractor has contacted all three current AC Transit vendors in zip code 94603. It is likely that one of the three vendors will become a Clipper vendor; the other two vendors are not responding or not interested. The contractor continues to look for other possible vendors in the zip code 94603.

Marketing / Outreach Plans:

The marketing outreach plan includes a combination of passenger education and outreach, vendor communications and internal staff communications. Attached is a document detailing outreach plan.

Prior Relevant Board Actions/Policies:

1. Adopt Resolution No. 09-011 Eliminating the Sale and Use of Transbay 10-Ride and 31-Day Magnetic-Strip Tickets from the District's and Dumbarton Express Fare
2. GM Memo 10-079 – Youth TransLink Transition Dates

Attachments:

1. Adult Local Paper Fare Media Elimination Marketing and Outreach
2. TransLink Program Management Report KPIs, May 2020
3. Vendor Maps from Title VI Analysis
4. Vendor Analysis by Zip Code

**Approved by: Mary V. King, Interim General Manager
Kathleen Kelly, Chief Operating Officer**

Prepared by: Ken Rhodes, Customer Service Manager

Date Prepared: August 26, 2010

AC Transit Adult Local Paper Fare Media Elimination

Communications Strategies

The challenge of transitioning thousands of Adult local passengers to TranLink/Clipper can be overcome with a comprehensive plan for reaching Adult Local passengers during their commute, and their day-to-day activities. Marketing and Community Relations staff has developed a strategy for communicating with Adult local passengers using a combination of tactics including creative marketing formats that are effective at reaching specific target markets, onboard signs, and online communications/social media. Staff will also work with other AC Transit employees – particularly Operations and Telephone Information staff – and retail vendors to educate them about the elimination of Adult local tickets. Working with MTC, staff will also leverage regional outreach efforts promoting the Clipper card in support of AC Transit's ticket elimination campaign.

1. Passenger education. Staff will reach AC Transit's Adult local passengers (including low-income and non-English speaking) in several ways. Educational materials will be produced in large quantities and in three languages, and handed out at outreach events, given out by ticket office staff, offered at AC Transit community meetings and events, and mailed to community groups, libraries and organizations through which passengers can be reached.

This summer, onboard signs in three languages will inform passengers of the end-of-sale date for Adult local paper media, followed in the fall by a second set of signs informing passengers of the end-of-acceptance date. All materials and signs will encourage Adult passengers to switch to Clipper, unless they already have a TransLink card which will continue to work. Regional MTC-sponsored street teams will promote Clipper at a variety of locations and on selected agency vehicles/bus lines, explaining how it works and where to obtain a free card. AC Transit's ticket elimination message will be made part of the regional Clipper outreach messaging.

Educational materials about the paper fare media elimination will include a trilingual brochure announcing the ticket elimination, posters in languages at AC Transit ticket vendors alerting customers of the upcoming change, and onboard signs in three languages. Whenever possible, AC Transit will include Clipper brochures in three languages with information about where to get a card and how to use it. Social media, e-News, and Web site articles with links to the clippercard.com site will also be used to inform passengers of the ticket elimination and persuade them to switch to Clipper.

Free (non-personalized, adult) Clipper cards will be available regionally for at least three months, approximately July – September, at ticket offices and all Clipper retail locations. (Agencies will be able to offer free Clipper cards for an indefinite period, as part of agency-specific outreach.)

Advertising specific to AC Transit's ticket elimination will include:

- Spanish-, Chinese-, and English-language radio spots, explaining the paper fare media elimination and how to use Clipper;
- Display ads in Spanish- and Chinese-language newspapers;
- Chinese and Spanish-language TV spots, repurposing the Clipper regional ad with a voiceover narration about AC Transit's ticket elimination, in the appropriate language;

- Messages imprinted on check-cashing cash jackets, in English and Spanish, distributed in check cashing stores in specific zip code areas in AC Transit's service in the East Bay

2. In person Outreach. AC Transit plans to use grant funds to hire its own trilingual street team to educate passengers on buses, at select BART stations, and other community locations, about their new fare payment options and about how to use Clipper. This effort will focus heavily on communities with a higher percentage of underserved passengers. Community organizations will receive geographically-targeted mailings of educational materials in appropriate languages.

3. Vendor Education- AC Transit and Clipper Retail Locations. Staff will also work with retail vendors to educate them about the elimination of Adult local tickets. (Cubic staff will be responsible for Clipper education.) AC Transit and Clipper vendors will receive a letter and phone call explaining the upcoming fare media change, and be provided with customer take-ones about AC Transit's Adult local ticket exchange program. All vendor materials will be available in English, Chinese, and Spanish.

4. Staff education- Operators and AC Transit customer services. At every point possible where passengers will interact with our operators, supervisors, and customer services staff, training and information will be provided so that front-line employees can clearly answer questions about the Adult local ticket elimination, and Clipper. Internal education will include a new TransLink/Clipper training video about using TransLink/Clipper, periodic Operations Bulletins, and the FAQ brochure and Clipper brochures. (Cubic customer services staff will also receive AC Transit-specific information.)

System Operations Key Performance Indicators

Table 3: Cardholder Support Service Performance Level Standards

KPI	KPI Description	Below Base	Base	Above Base	KPI Value Apr. 10	KPI Value Mar. 10
I.	Percent of telephone calls answered by live agent within 20 seconds	< 80%	80-90%	> 90%	85.84%	90.48%
II.	Percent of telephone calls voluntarily abandoned by caller	> 6%	4-6%	< 4%	1.82%	1.87%
III.	Percent of telephone calls answered within 3 minutes	< 90%	90-98%	> 98%	98.45%	98.45%
IV.	Average number of days to fill request for new card	> 5	2-5	< 2	2.14	2.24
V.	Percent of requests for replacement card filled within 3 business days	< 95%	95-98%	> 98%	98.49%	96.71%
VI.	Average number of hours to process Remote Add Value requests	> 24	12-24	< 12	4.62	4.98
VII.	Percent of transaction history requests processed within 3 business days	< 95%	95-98%	> 98%	98.00%	98.91%
VIII.	Percent of card value refunds processed within 21 business days	< 98%	98-99.5%	> 99.5%	100.00%	100.00%
IX.	Percent that the website homepage is available	< 99%	99-99.73%	> 99.73%	99.93%	99.81%
X.	Percent of email contacts acted upon within 24 hours	< 90%	90-98%	> 98%	TBD	TBD
XI.	Percent of calls resolved on the first call	< 65%	65-80%	> 80%	78.31%	76.97%
XII.	Customer satisfaction	< 65%	65-80%	> 80%	TBD	TBD

Above baseline requirement
 Meets baseline requirement
 Below baseline requirement

Contractor met all KPIs in April.



System Operations Key Performance Indicators

Table 4: System Availability Performance

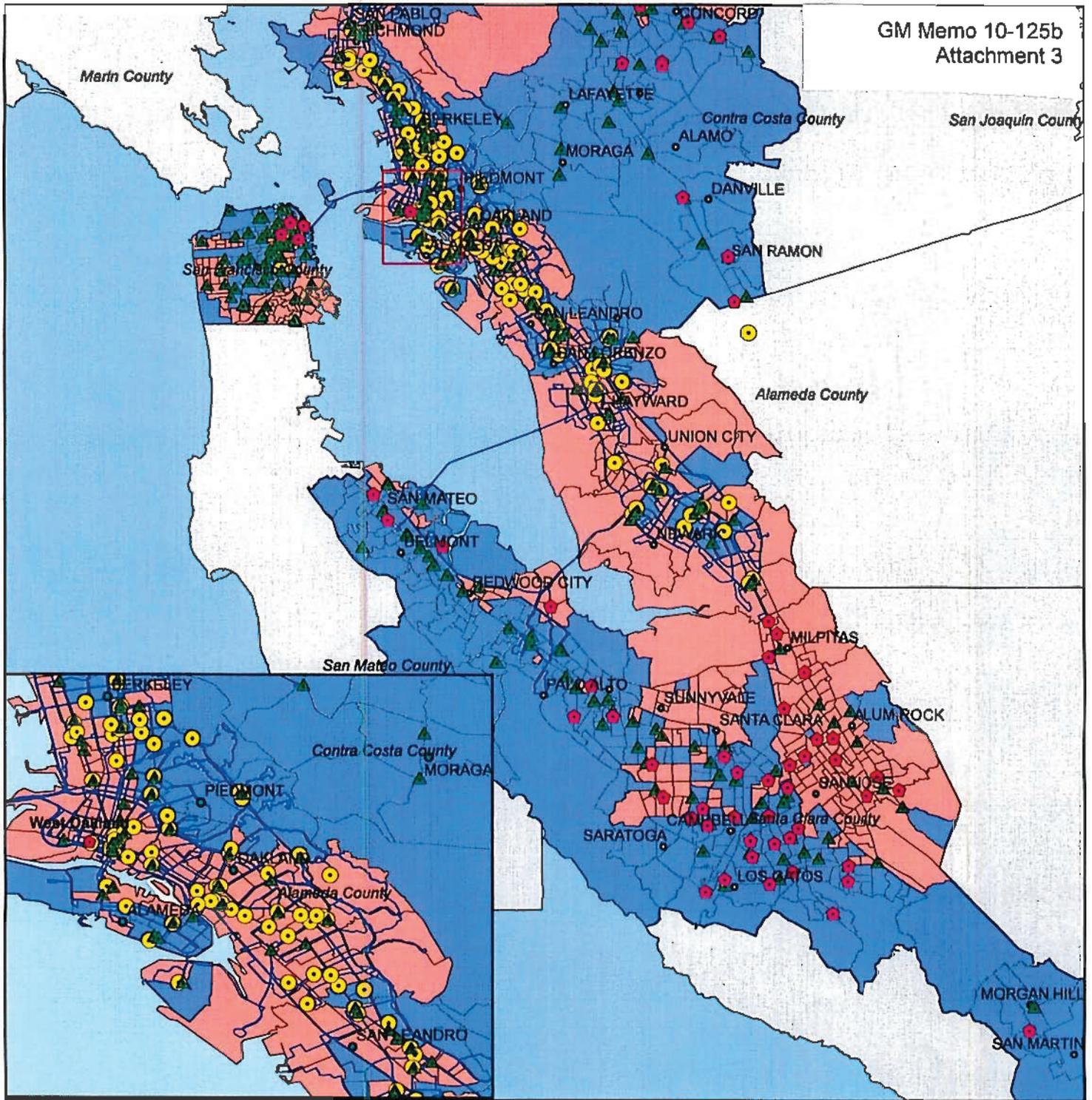
Device	Goal	Status
AVM	99.73%	97.93% ¹
TOT	99.73%	99.41% ²
TDS	99.73%	99.79%
TCS	99.73%	100%
Data Store	99.73%	100%

Table 5: Accuracy Performance – April 2010

Device	Goal	Status
AVM	99.73%	100%
TOT	99.73%	100%
CID1	99.73%	99.89%
CID2	99.73%	100%
CID3	99.73%	93.54% ³

1. AVM performance was marginal due to multiple card reader replacements.
2. A software bug prevented TOT operators from issuing senior cards using the driver's license as the document type. TOT operators identified a workaround for this issue, which did not affect device functionality.
3. The TransLink Contractor is investigating the decline in CID3 accuracy.





Proportion of Minorities in the Alameda-Contra Costa Transit District

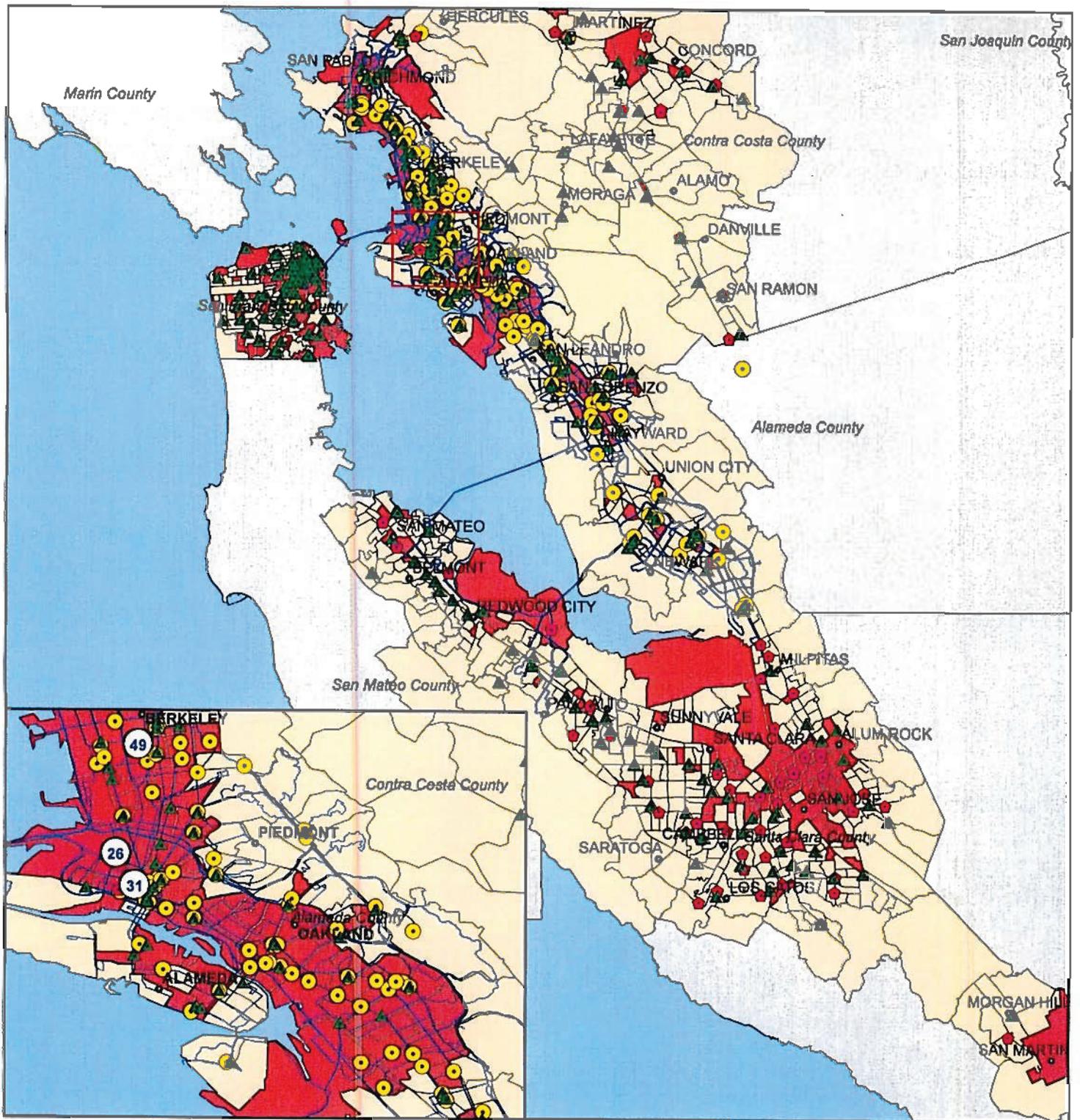
- ◆ Future Clipper Merchants
- ▲ Clipper Vendors
- AC Transit Vendors
- Transit Routes

Census 2000

Proportion of Minority Population

- Below Average
- Average
- Above Average

FIGURE 1
Assessment 3
Alameda-Contra Costa Transit District



Proportion of Low Income in the Alameda-Contra Costa Transit District

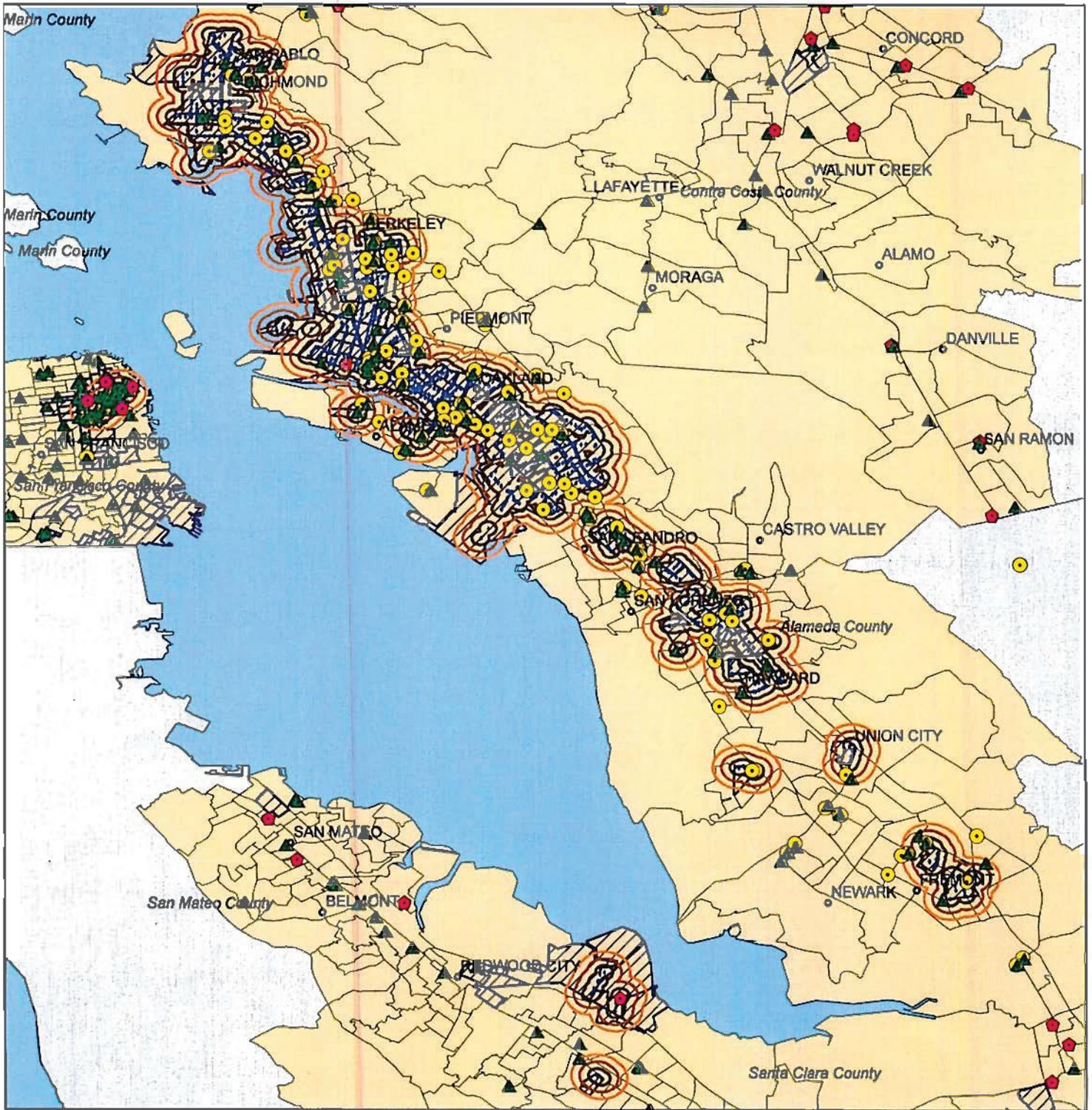
- ◆ Future Clipper Merchants
- ▲ Clipper Vendors
- AC Transit Vendors
- Transit Routes

Census 2000

Proportion of Low Income Persons

- Below Average
- Average
- Above Average

FIGURE 2
Assessment 3
Alameda-Contra Costa Transit District



AC Transit and Clipper Vendors within Quarter, Half, and Three Quarter Mile Radii of Transit Stops serving Predominantly Minority and Low Income Areas

- ▲ Clipper Vendor
- ◆ Future Clipper Vendor
- AC Transit Vendors
- Quarter Mile
- Half Mile
- Three_Quarter_Mile
- Transit Stops in Tracts > Avg Min and LI Populations
- ▨ Tracts > Average Min and LI Popn
- AC TRANSIT Service Area

FIGURE 8
Assessment 3
Alameda-Contra Costa Transit District

Summary of Data

Vendors by City

City	Current	Future	Difference
Alameda	5	7	2
Albany	1	2	1
Berkeley	13	9	(4)
Castro Valley	2	3	1
El Cerrito	3	3	0
El Sobrante	0	1	1
Emeryville	1	2	1
Fremont	11	11	0
Hayward	6	9	3
Newark	2	2	0
Oakland	41	28	(13)
Pinole	2	2	0
Richmond	4	4	0
Rodeo	1	0	(1)
San Leandro	7	10	3
San Lorenzo	1	0	(1)
San Pablo	2	6	4
Total	102	99	(3)

Vendors By Ward

Ward	Current	Future	Difference
1	20	21	1
2	31	24	(7)
3	26	20	(6)
4	9	17	8
5	16	17	1
Total	102	99	(3)

Comparison by Location (City and Zip Code)
AC Transit retail vendors vs. Clipper retail vendors

Updated 7/5/10

AC Transit Retail Vendor	Address	City	Zip	Clipper Retail Vendor	Address	City	Zip
Longs Drugs #5/ CVS #09128	2314 Santa Clara Ave.	Alameda	94501	Nob Hill #632	2531 Blanding Avenue	Alameda	94501
Lucky #700	815 Marina Village Pkwy.	Alameda	94501	Walgreens #4050	1916 Webster Street	Alameda	94501
				CVS	2314 Santa Clara Avenue #9128	Alameda	94501
				CVS	885 A Island Drive #9250	Alameda	94501
Mastick Senior Center *	1155 Santa Clara Ave	Alameda	94501	CVS	931 Marina Village Parkway #9255	Alameda	94501
Safeway	867 Island Drive	Alameda	94501	Walgreens #9248	2300 Otis Drive	Alameda	94501
Safeway	2130 Southshore Center	Alameda	94501	Packaging Store	535 South Shore Center	Alameda	94501
Eskaton Hazel Shirley	11025 San Pablo Ave.	El Cerrito	94530	Walgreens #3770	11565 San Pablo Avenue	El Cerrito	94530
Lucky #709	1000 El Cerrito Plaza	El Cerrito	94530	CVS	10650 San Pablo Avenue #3053	El Cerrito	94530
Safeway	10636 San Pablo Ave.	El Cerrito	94530	CVS	670 El Cerrito Plaza #9086	El Cerrito	94530
Long's #49/ CVS #09600	35720 Fremont Blvd	Fremont	94536				
Lucky #712	34101 Fremont Blvd.	Fremont	94536				
Lucky #713	35820 Fremont Blvd.	Fremont	94536				
Safeway	39100 Argonaut Way	Fremont	94536	CVS	35720 Fremont Boulevard #9600	Fremont	94536
Long's #3/ CVS #09099	4020 Fremont Hub	Fremont	94538	Bin & Barrel	42314 Fremont Boulevard	Fremont	94538
Lucky #711	40055 Mission Blvd.	Fremont	94538	Walgreens #2660	41400 Blacow Road	Fremont	94538
Lucky #714	5000 Mowry Ave.	Fremont	94538	Walgreens #4517	2600 Mowry Avenue	Fremont	94538
Raley's #315	39200 Paseo Padre Pkwy	Fremont	94538	Raley's #315	39200 Paseo Padre Parkway	Fremont	94538
Safeway	3902 Washington Blvd	Fremont	94538	CVS	4020 Fremont Hub #9099	Fremont	94538
Long's #234/ CVS #09234	46445 Mission Blvd.	Fremont	94539	Mission Liquors	39945 Mission Boulevard	Fremont	94539
Safeway	46848 Mission Blvd.	Fremont	94539	Walgreens #6080	46844 Mission Boulevard	Fremont	94539
				CVS	46445 Mission Boulevard #9234	Fremont	94539
				CVS	2000 Driscoll Road #931	Fremont	94539
				Walgreens #2366	3660 Decoto Road	Fremont	94555
Long's #472/ CVS #00816	22801 Foothill Blvd.	Hayward	94541	Walgreens #2401	21463 Foothill Boulevard	Hayward	94541
Lucky #715	22555 Mission Blvd.	Hayward	94541	Walgreens #6502	23958 Hesperian Boulevard	Hayward	94541
				CVS	22501 Foothill Boulevard #816	Hayward	94541
Long's #53/ CVS #09622	243 W. Jackson St.	Hayward	94544	Walgreens #4659	164 W Jackson Street	Hayward	94544
Safeway	22280 Foothill Blvd.	Hayward	94544	Walgreens #2306	1138 W Tennyson	Hayward	94544
Safeway	231 West Jackson St.	Hayward	94544	Joyti Supermarket	27938 Baldwin Street	Hayward	94544
				Walgreens #5310	26781 Mission Boulevard	Hayward	94544
				Food Source #710	26905 Mission Boulevard	Hayward	94544
				CVS	243 West Jackson Street #9622	Hayward	94544
Lucky #716	25151 Santa Clara St.	Hayward	94545				
Lucky #704	3443 Castro Valley Blvd.	Castro Valley	94546	Walgreens #101	3382 Castro Valley Boulevard	Castro Valley	94546
Safeway	20629 Redwood Rd.	Castro Valley	94546	CVS	3667 Castro Valley Boulevard #9904	Castro Valley	94546
				PW Markets	4015 E. Castro Valley Blvd.	Castro Valley	94552
Raley's #314	6397 Jarvis Ave.	Newark	94560	Check Stop Check Cashing	7052 Jarvis Avenue	Newark	94560
Safeway	5877 Jarvis Ave.	Newark	94560	Raley's #314	6397 Jarvis Avenue	Newark	94560
				CVS	35080 Newark Blvd. #9494	Newark	94560
Lucky #742	1530 Fitzgerald Drive	Pinole	94564	Pinole Vista Liquor	1586 Fitzgerald Drive	Pinole	94564
				CVS	1401 Tara Hills Drive #9299	Pinole	94564
Safeway	1421 Tara Hill Drive	Pinole	94579				
Safeway	605 Parker Ave., Bldg. A	Rodeo	94572				
Long's #354/ CVS #09842	1401 Washington Ave.	San Leandro	94577	CVS	1188 East 14th Street #9635	San Leandro	94577
Lucky Check Cashing Inc.	1210 E. 14th St.	San Leandro	94577	CVS	1401 Washington #9942	San Leandro	94577

AC Transit Retail Vendor	Address	City	Zip	Clipper Retail Vendor	Address	City	Zip
Safeway	555 Bancroft Ave.	San Leandro	94577				
Safeway	1499 Washington Ave.	San Leandro	94577				
Long's #469/CVS #00414	14869 E. 14th Street	San Leandro	94578	Guadalajara Market Y Camicera	14327 E 14th Street	San Leandro	94578
Lucky #767	1300 Fairmont Drive	San Leandro	94578	CVS	14869 E. 14th St. #414	San Leandro	94578
My TransitPlus	15242 Hesperian Blvd.	San Leandro	94578	Guadalajara Western Wear	14341 E 14th Street	San Leandro	94578
				Walgreens # 3032	15850 E 14th Street	San Leandro	94578
				My Transit Plus Bay Fair Station	15242 Hesperian Blvd.	San Leandro	94578
				Walgreens # 7274	1456 136th Avenue	San Leandro	94578
				CVS	699 Lewelling Boulevard #9876	San Leandro	94579
				Walgreens # 2426	15500 Washington Avenue	San Leandro	94579
Lucky #768	15840 Hesperian Blvd.	San Lorenzo	94580				
				Le Asia Supermarket	9100 Alcosta Boulevard	San Ramon	94583
Lucky #782	32300 Dyer St.	Union City	94587	Penny Wireless	34675 Alvarado Niles Road	Union City	94587
Lucky Check Cashing Inc.	31854 Alvarado Blvd.	Union City	94587				
Safeway	1790 Decoto Rd	Union City	94587				
				CVS	987 East Hillsdale Boulevard #9879	Foster City	94404
				Walgreens # 4026	2900 N. Main Street	Walnut Creek	94596
				CVS	50 Moraga Way #9939	Orinda	94563
Ciudad De Mexico	3800 International Blvd.	Oakland	94601	Farmam Snack & Grocery	3313 Farmam Street	Oakland	94601
Evergreen Produce	3225 Foothill Blvd.	Oakland	94601	Walgreens # 1537	3232 Foothill Boulevard	Oakland	94601
Foodvale Market	3401 International Blvd.	Oakland	94601	Ciudad de Mexico	3800 International Boulevard	Oakland	94601
Fruitvale & San Antonio Sr. Ctr.	3301 E 12th Street, Ste 201	Oakland	94601				
La Raza Market	5040 B International Blvd	Oakland	94601				
Mi Ranchito	3326 Foothill Blvd	Oakland	94601	Bay Area Wireless	3237 Foothill Boulevard	Oakland	94601
Longs Drugs #24/CVS #09226	3320 Fruitvale Ave.	Oakland	94602	CVS	3320 Fruitvale Avenue #9226	Oakland	94602
Safeway	3550 Fruitvale Ave.	Oakland	94602				
4-A Check Cashing	1082 98th Ave.	Oakland	94603				
California Check Cashing	10950 International Blvd #S	Oakland	94603				
In & Out Check Cashing	10220 International Blvd.	Oakland	94603				
Checks, ETC.	7300 Mac Arthur Blvd	Oakland	94605	Checks, Etc.	7300 MacArthur Boulevard	Oakland	94605
Chico's Market	2801 Havenscourt Blvd.	Oakland	94605	Chico's Market	2801 Havenscourt Boulevard	Oakland	94605
EZ Pay Payment Centers	7637 MacArthur Blvd	Oakland	94605	E-Z Pay Payments Center	7637 MacArthur Blvd.	Oakland	94605
Shop Rite Market	5800 Bancroft Ave.	Oakland	94605	Shop Rite Market	5800 Bancroft Avenue	Oakland	94605
Lucky #736	247 E. 18th St.	Oakland	94606				
New Chinatown Pharmacy	719 E. 12th St.	Oakland	94606	New Chinatown Pharmacy	719 E. 12th Street	Oakland	94606
M&F Check Cashing	900 Market St. - Suite L	Oakland	94607				
New Oakland Pharmacy	388 9th St., Suite 108	Oakland	94607	New Oakland Pharmacy	388 9th Street	Oakland	94607
New Oakland Pharmacy	333 9th St.	Oakland	94607	New Oakland Pharmacy	333 9th Street	Oakland	94607
Y & S Check Cashing	1460-A 7th Street	Oakland	94607	Y&S Check Cashing	1460 7th Street	Oakland	94607
West Oakland Senior Center	1724 Adeline St.	Oakland	94607				
				Walgreens # 3170	3400 Telegraph Avenue	Oakland	94609
				Lee's Donuts	4013 "D" Telegraph Avenue	Oakland	94609
CVS #01283	3228 Lakeshore Ave.	Oakland	94610	Walgreens # 1625	5055 Telegraph Avenue	Oakland	94609
				Walgreens # 10526	3250 Lakeshore Avenue, Ste B	Oakland	94610
Oakland Senior Center.*	200 Grand Ave.	Oakland	94610	CVS	3236 LAKESHORE AVE # 1283	OAKLAND	94610
Safeway	3747 Grand Ave.	Oakland	94610				
Long's #7/CVS #09130	175 41st St.	Oakland	94611	CVS	5100 Broadway #3023	Oakland	94611
Lucky #734	1963 Mountain Blvd.	Oakland	94611	CVS	175 41st Street #9130	Oakland	94611
Safeway	5130 Broadway	Oakland	94611	CVS	2000 MOUNTAIN BLVD #9929	OAKLAND	94611

AC Transit Retail Vendor	Address	City	Zip	Clipper Retail Vendor	Address	City	Zip
Safeway	2096 Mountain Blvd.	Oakland	94611				
AC Transit Customer Service	1600 Franklin Street	Oakland	94612	AC Transit Cust. Service Ctr.	1600 Franklin Street	Oakland	94612
Long's #386/CVS #09957	344 20th St.	Oakland	94612	CVS	344 20th Street #9957	Oakland	94612
Lucky #735	3000 E. 9th St.	Oakland	94612				
Take 5 Snack & News	1221 Broadway Street	Oakland	94612				
TNT Financial	2510 Telegraph Ave.	Oakland	94612	TNT Check Cashing	2510 Telegraph Avenue	Oakland	94612
Walgreens	1330 Broadway	Oakland	94612	Walgreens # 2393	1330 Broadway	Oakland	94612
Lucky Check Cashing Inc.	1518 Broadway	Oakland	94612				
East Bay Korean Center	1723 Telegraph Ave.	Oakland	94612				
Lucky #733	4055 MacArthur Blvd.	Oakland	94619	CVS	4100 REDWOOD RD #9378	OAKLAND	94619
My TransiPlus	7200 San Leandro Blvd.	Oakland	94621	Walgreens # 3295	8102 E 14th Street	Oakland	94621
Kwik Way Payment Center	6207 International Blvd.	Oakland	94621	My Transit Plus Coliseum Station	7200 San Leandro Blvd.	Oakland	94621
E14 Produce	7135 International Blvd	Oakland	94621				
Long's #553/CVS #9553	4349 San Pablo Ave	Emeryville	94621	65th Street Market	6444 San Pablo Avenue	Emeryville	94608
Ecology Center	2530 San Pablo Ave.	Berkeley	94702	CVS	4349 San Pablo Avenue #9553	Emeryville	94608
No Hassle Check Cashing	2800 San Pablo Ave.	Berkeley	94702	Walgreens # 2609	2995 San Pablo Avenue	Berkeley	94702
Andronico's Market #4	1414 University Ave.	Berkeley	94702	No Hassle Check Cashing	2800 San Pablo Avenue	Berkeley	94702
Berkeley Bowl	2020 Oregon St.	Berkeley	94703	Annaher Grocery & Liquors Inc.	2451 San Pablo Avenue	Berkeley	94702
Lee's Market	2700 Martin Luther King Jr Way	Berkeley	94703	Walgreens #4614	2801 Adeline Street	Berkeley	94703
Safeway	1444 Shattuck Pl.	Berkeley	94703				
Ashby Supermarket	2948 Martin Luther King Jr. Way	Berkeley	94703				
Andronico's Market #2	2655 Telegraph Ave.	Berkeley	94704	Walgreens # 10045	2310 Telegraph Avenue	Berkeley	94704
Walgreens	2187 Shattuck Ave.	Berkeley	94704	Walgreens # 3127	2187 Shattuck Ave.	Berkeley	94704
Berkeley Mallroom *	2124 Kittredge St.	Berkeley	94704	CVS	2300 SHATTUCK AVE #3026	BERKELEY	94704
Long's #496/CVS #03026	2300 Shattuck Ave	Berkeley	94704				
Redwood Gardens	2951 Derby St.	Berkeley	94705				
Andronico's Market #1	1850 Solano Ave.	Berkeley	94707	CVS	1451 Shattuck Avenue #9941	Berkeley	94709
Safeway	1500 Solano Ave.	Albany	94708	Walgreens # 2314	1050 Gilman Street	Berkeley	94710
				Copy Express	1164 Solano Ave.	Albany	94706
				CVS	1382 SOLANO AVE #9595	ALBANY	94706
My TransiPlus	1600 Nevin Ave.	Richmond	94801	My Transit Plus Richmond Station	1600 Nevin Avenue	Richmond	94801
Commercial Support	1420 Regatta Blvd.	Richmond	94804	Walgreens # 2506	1150 Macdonald Avenue	Richmond	94801
Richmond Senior Center *	2525 MacDonal Ave.	Richmond	94804	CVS	2151 Meeker Avenue #3078	Richmond	94804
Safeway	4925 MacDonal Ave.	Richmond	94805	Azteca Sport & Minimart	3405 Macdonald Avenue	Richmond	94805
Lucky #769	300 San Pablo Towne Center	San Pablo	94806	Adobe Liquors	13800 San Pablo Avenue	San Pablo	94806
San Pablo Senior Center *	1943 Church Lane	San Pablo	94806	Walgreens # 2435	13751 San Pablo Avenue	San Pablo	94806
				Handy Liquors	14301 San Pablo Street	San Pablo	94806
				Walgreens # 11861	2455 San Pablo Dam Road	San Pablo	94806
				Walgreens # 4491	15650 San Pablo Avenue	San Pablo	94806
				Raley's #321	3360 San Pablo Dam Road	San Pablo	94806
				Walgreens # 4049	3630 San Pablo Dam Road	El Sobrante	94803
* These AC vendors sell to the public.	Currently /05 AC Transit vendors			CVS	45 North Milpitas Boulevard #9161	Milpitas	95035
				CVS	855 El Camino Real, Space 116 #3935	Palo Alto	94301
				CVS	352 University Avenue #9915	Palo Alto	94301
				CVS	2701 Middlefield Road #9984	Palo Alto	94306
				CVS	1039 El Camino Real #9329	Redwood City	94063

AC Transit Retail Vendor	Address	City	Zip	Clipper Retail Vendor	Address	City	Zip
				CVS	1301 Broadway #9690	Redwood City	94063
				CVS	77 Bovet Road #9554	San Mateo	94402
				CVS	4242 South El Camino Real #9833	San Mateo	94403
				CVS	872 North Delaware #9940	San Mateo	94401
				CVS	124 DE ANZA BLVD #9977	SAN MATEO	94402
				Before adding CVS locations, there are currently 73 TL/Clipper retail locations in AC Transit service area			
				Once all 42 CVS locations are selling Clipper, the Clipper network in service area will total 115 locations.			

Pink = high-volume AC Transit sales location

First 15 CVS stores scheduled to start selling Clipper August 2010

non-CVS Clipper locations current as of May, 2010