

Remotely-Piloted Personal Delivery Devices

Existing Policy Summary & Recommendations

Purpose

In both Santa Monica and the City of Los Angeles, Coco was approved to support local businesses with their delivery needs as the cities developed their regulations for Personal Delivery Devices. Coco would like to begin providing local deliveries for restaurants and markets in Culver City by late October / early November. Below is a summary of the regulations Coco recommends for this space, based on what has proven effective elsewhere. Coco has provided thousands of deliveries without any major incidents. These deliveries have prevented the emissions of thousands of pounds of CO2 and saved their restaurant and market partners thousands of dollars in delivery costs.

Regulation Recommendations

Speed Limit: 7 mph on sidewalks

Weight Limit: 100 lb (empty) - Early state legislation often adopted 80 lb limits based on the weight of vehicles available at the time. Most sidewalk robots available now are a little larger (80lb to 100 lb), this accommodates grocery orders.

Visibility Flag: Required

Remotely-piloted Vehicles: Treated separately from autonomous vehicles.

Insurance: Required

Fleet size: No caps necessary, as fleet size is naturally limited by local restaurant and market demand. The reasons motivating fleet caps for shared e-scooters do not apply to remotely-piloted personal delivery devices. Unlike e-scooters, these devices are never left unattended or fallen over in groups on sidewalks. They also only operate at low speeds and under the guidance of trained pilots. The vehicles are expensive and operators are not incentivized to flood the city with vehicles in search of riders. If a cap is included, it should be able to scale regularly with city approval. The City of Santa Monica does not have a cap and has not had any issues with too many vehicles being deployed. Los Angeles, in their pilot, included a cap of 75 vehicles per neighborhood, with increases allowed with approval from LADOT.

Other: Vehicles required to yield to pedestrians. Brake and lighting standards should be included (see Santa Monica and state regulations).

Background

State Legislation: Many states have adopted legislation allowing for the operation of personal delivery devices. Speed limits, weight limits and insurance are usually included (see table on the next page). Requirements also often address braking, lighting, and other operational guidelines (e.g., yielding to pedestrians). While the state regulations we have reviewed do not include caps on fleet size, if such regulations are being considered, we have provided recommendations (below) that we believe would make the program successful. Note that a number of states have recently adopted legislation allowing for significantly heavier vehicle types, faster speed limits, and on street operation--these vehicle types should be treated separately.

City Legislation: While a few cities have adopted regulations around autonomous delivery, these have been designed to be extremely limited tests of autonomous technology, often including very low fleet size limits, and requiring physical chaperones. Such regulations are inappropriate for remotely-piloted personal delivery devices and would prevent them from being a significantly helpful option for local businesses during COVID and the post-COVID economic recovery. Santa Monica and Los Angeles, however, have adopted regulations specific to remotely-piloted personal delivery devices. Please see attached ordinance, which was unanimously approved by the City Council. Initially Santa Monica had contemplated only allowing personal delivery devices in their Downtown/Main Street Zero Emission Delivery Zone, but after hearing from restaurants dealing with the high cost of car-based delivery services, and residents excited about having more sustainable delivery options, they quickly recommended that remotely-piloted delivery devices be allowed to operate throughout the city. After months of operation and hundreds of miles traveled without any significant accidents, incidents, or complaints, the program is seen as a tremendous success and has broad support from local businesses, neighborhood associations, business improvement districts, and city staff.

Personal Delivery Device - State Legislation Examples

State	Bill #	Top Speed	Weight (no cargo)	Insurance (Min)
Idaho	HB 204 (2017)	10 mph	80 lb	Required. Amount not specified.
Wisconsin	Act 13 (2017)	10 mph	80 lb	NA
North Carolina	SB 739 (2020)	10 mph (sidewalks), 20 mph streets	500 lb	\$100,000
Ohio	State Budget Bill Addition (2017)	10 mph	90 lb	\$100,000
Florida	HB 1027 (2017)	10 mph	80 lb	\$100,000
Virginia	SB 1207 (2017)	10 mph	- 50 lb	\$100,000
Arizona	- SB 1305 (2020) - HB 2422 (2018)	- 12 mph In ped zone, 20 highway shoulder. Local authority can lower to 7 mph in pedestrian zone. - 7 mph	- 200 lb - 80 lb	\$100,000
Utah	H.B. 277 (2020)	10 mph	150 lb	\$100,000
Tennessee	SB 2836	10mph	NA	\$100,000
Texas	SB 969 (2019-2020)	10 mph (local authority can set as low as 7 mph)	NA	\$100,000