



District of Columbia Taxicab Commission

Payment Service Providers (PSP) Audit Report

Sept 10, 2015



1.0	Introduction	7
2.0	Auditors' Statement	7
2.1	Audit Process	7
2.2	Audit Scope	8
2.3	Audit Questions and Compliance	8
3.1	Audit Response - Creative Mobile Technologies (CMT)	9
3.1.1	Contract	12
3.1.2	Confirmation Telephone Number	12
3.1.3	Secure Storage of Business Records	12
3.1.4	Archiving of Business Records	13
3.1.5	Copy of Fee Table or Statement of Fees	13
3.1.6	Copies of Records Demonstrating Payments	13
3.1.7	Statement of Current Vehicle Inventory	13
3.1.8	Operator Inventory	14
3.1.9	Demonstration for Multiple Brands	14
3.1.10	Validation of Dataset Against TDMS data	14
3.1.11	Contingency Plan - Storage of Data	14
3.1.12	Contingency Plan - Collection of Required Data	15
3.1.13	Contingency Plan - Transmittal of Required Data	15
3.1.14	Monitoring of Data Input for Errors	15
3.1.15	Statement of Integration - Third Party DDS	15
3.1.16	Physical Equipment Compliance	16
3.1.17	Safety Features	16
3.2	Audit Response - Hitch	17
3.2.1	Contract	19
3.2.2	Confirmation Telephone Number	19
3.2.3	Secure Storage of Business Records	20
3.2.4	Archiving of Business Records	20
3.2.5	Copy of Fee Table or Statement of Fees	20
3.2.6	Copies of Records Demonstrating Payments	20
3.2.7	Statement of Current Vehicle Inventory	21
3.2.9	Demonstration for Multiple Brands	21

3.2.10	Validation of Dataset Against TDMS data	21
3.2.11	Contingency Plan - Storage of Data	21
3.2.12	Contingency Plan - Collection of Required Data	22
3.2.13	Contingency Plan - Transmittal of Required Data	22
3.2.14	Monitoring of Data Input for Errors	22
3.2.15	Statement of Integration - Third Party DDS	22
3.2.16	Physical Equipment Compliance	22
3.2.17	Safety Features	23
3.3	Audit Response - Transco	24
3.3.1	Contract	26
3.3.2	Confirmation Telephone Number	27
3.3.3	Secure Storage of Business Records	27
3.3.4	Archiving of Business Records	27
3.3.5	Copy of Fee Table or Statement of Fees	27
3.3.6	Copies of Records Demonstrating Payments	27
3.3.7	Statement of Current Vehicle Inventory	28
3.3.8	Statement of Current Operator Inventory	28
3.3.9	Demonstration for Multiple Brands	28
3.3.10	Validation of Dataset Against TDMS data	28
3.3.11	Contingency Plan - Storage of Data	29
3.3.12	Contingency Plan - Collection of Required Data	29
3.3.13	Contingency Plan - Transmittal of Required data	29
3.3.14	Monitoring of Data Input for Errors	30
3.3.15	Statement of Integration - Third Party DDS	30
3.3.16	Physical Equipment Compliance	30
3.3.17	Safety Features	30
3.4	Audit Response - UVC	31
3.4.1	Contract	33
3.4.2	Confirmation Telephone Number	34
3.4.3	Secure Storage of Business Records	34
3.4.4	Archiving of Business Records	34
3.4.5	Copy of Fee Table or Statement of Fees	34

3.4.6	Copies of Records Demonstrating Payments	35
3.4.7	Statement of Current Vehicle Inventory	35
3.4.8	Statement of Current Operator Inventory	35
3.4.9	Demonstration for Multiple Brands	35
3.4.10	Validation of Dataset Against TDMS data	35
3.4.11	Contingency Plan - Storage of Data	36
3.4.12	Contingency Plan - Collection of Required Data	36
3.4.13	Contingency Plan - Transmittal of Required Data	36
3.4.1	4 Monitoring of Data Input for errors	36
3.4.15	Statement of Integration - Third Party DDS	37
3.4.16	Physical Equipment Compliance	37
3.4.1	7 Safety Features	37
3.5	Audit Response - Verifone	38
3.5.1	Contract	41
3.5.2	Confirmation Telephone Number	41
3.5.3	Secure Storage of Business Records	42
3.5.4	Archiving of Business Records	42
3.5.5	Copy of Fee Table or Statement of Fees	42
3.5.6	Copies of Records Demonstrating Payments	42
3.5.7	Statement of Current Vehicle Inventory	43
3.5.8	Statement of Current Operator Inventory	43
3.5.9	Demonstration for Multiple Brands	43
3.5.10	Validation of Dataset Against TDMS data	43
3.5.11	Contingency Plan - Storage of Data	43
3.5.12	Contingency Plan - Collection of Required Data	44
3.5.13	Contingency Plan - Transmittal of Required Data	44
3.5.14	Monitoring of Data Input for Errors	44
3.5.15	Statement of Integration - Third Party DDS	44
3.5.16	Physical Equipment Compliance	45
3.5.17	Safety Features	45
3.6	Audit Response - VIP	46
3.6.1	Contract	48

3.6.2	Confirmation Telephone Number	48
3.6.3	Secure Storage of Business Records	49
3.6.4	Archiving of Business Records	49
3.6.5	Copy of Fee Table or Statement of Fees	49
3.6.6	Copies of Records Demonstrating Payments	49
3.6.7	Statement of Current Vehicle Inventory	50
3.6.8	Statement of Current Operator Inventory	50
3.6.9	Demonstration for Multiple Brands	50
3.6.10	Validation of Dataset Against TDMS data	50
3.6.11	Contingency Plan - Storage of Data	50
3.6.12	Contingency Plan - Collection of Required Data	51
3.6.13	Contingency Plan - Transmittal of Required Data	51
3.6.14	Monitoring of Data Input for Errors	51
3.6.15	Statement of Integration - Third Party DDS	51
3.6.16	Physical Equipment Compliance	52
3.6.17	Safety Features	52
3.7	Audit Response - Yellowcab of DC	53
3.7.1	Contract	55
3.7.2	Confirmation Telephone Number	56
3.7.3	Secure Storage of Business Records	56
3.7.4	Archiving of Business Records	56
3.7.5	Copy of Fee Table or Statement of Fees	56
3.7.6	Copies of Records Demonstrating Payments	56
3.7.7	Statement of Current Vehicle Inventory	57
3.7.8	Statement of Current Operator Inventory	57
3.7.9	Demonstration for Multiple Brands	57
3.7.10	Validation of Dataset Against TDMS data	57
3.7.11	Contingency Plan - Storage of Data	58
3.7.12	Contingency Plan - Collection of Required Data	58
3.7.13	Contingency Plan - Transmittal of Required Data	58
3.7.14	Monitoring of Data Input for Errors	58
3.7.15	Statement of Integration - Third Party DDS	58

3.7.16	Physical Equipment Compliance	59
3.7.17	Safety Features	59
4.0	Initial Findings	59
4.1	Inconsistencies in Contract and frequency of payment	60
4.2	Operator Records	60
4.3	Variation in Fees	61
4.4	DDS Integration	61
4.5	In Vehicle Information Module Technical Specifications	61
4.6	In Vehicle Safety Features	61
4.7	PSP Audit Updates	62

1.0 Introduction

This document reports on the findings of the Payment Service Providers (“PSP”) audit undertaken by independent consultants Dr. James M. Cooper and Pedro Agosto on behalf of the District of Columbia Taxicab Commission (“DCTC” or “Commission”) in July and August 2015.

This report details the findings in respect of individual PSPs and may contain information that is confidential and proprietary. As a result the report is not intended for public circulation.

2.0 Auditors’ Statement

We have undertaken the following audit in accordance with the submission made by the District of Columbia Taxicab Commission (“DCTC”) (“Commission”) in accordance with the commission’s objectives under Title 31 of the District of Columbia Municipal Regulations (“Title 31”), “Taxicabs and Public Vehicles for Hire”. The audit relates to the areas of responsibility defined within the submission to audit PSPs, with prior notice to PSPs and set out in detail below.

We conducted our audits in accordance with our understanding of current standards, Government Auditing Standards (2011 revision), set out by the Comptroller General of the United States, GAO-12-331G.

While all the PSPs appeared to be compliance in the majority of the requirements, it is also noted that none fulfilled the requirements for passenger safety features. This is discussed in more detail in the subsequent text.

2.1 Audit Process

The audit follows a standard set of questions focused on four core operating areas mandated under Title 31, and notified to all PSPs currently providing services to taxi operators and companies in the District of Columbia. Details of the questions asked are set out in subsequent sections of this document.

PSPs were provided with a copy of the questions at least two weeks in advance of the audit meeting, and were invited to prepare materials specific to the questions. PSPs were also able to seek clarification of the intended meanings of the questions, which two PSPs did.

An audit meeting was then arranged in agreement with the PSPs and scheduled to take place in the District offices of each of the PSPs.

Following the audit, PSPs were provided with a copy of a draft Audit Report and invited to provide any feedback and additional information based on the report. The reports and subsequent additional information is set out in detail in the subsequent sections of this document.

2.2 Audit Scope

This audit is limited in scope to an assessment of the current operation of PSPs providing services to taxicabs within the District of Columbia and their adherence to the operational and data requirements as set out in Title 31.

The audit covered four objective areas: contractual compliance, operational compliance, record keeping and data handling. Wherever possible, copies of documents that demonstrate compliance have been provided and are held at the DCTC. Due to the confidential and proprietary nature of this information these are not available for public review, but are certified, by the consultants, as accurate where addressed.

2.3 Audit Questions and Compliance

In this report, we address individual questions pertaining to the four objective areas. We also describe the areas of compliance; describe the appropriate response, including the format of response; and provide the audit response.

The majority of PSPs also operate as taxi companies in their own right. These include individual companies operating under a single brand, and companies that operate under a number of different names. One PSP limits its service to provision of payment services to other taxi companies. Thus Yellowcab provides PSP services to its operators and a dispatch service to the public. Verifone provides services to taxi companies only, as a Business to Business (B2B) provider without a public dispatch function, and the Taxi Company then sells the payment service to their operators and provides such dispatch functions as appropriate.

In the subsequent pages we set out the responses of each of the PSPs in alphabetical order.

3.1 Audit Response - Creative Mobile Technologies (CMT)

A PSP audit was undertaken in the Washington D.C. offices of CMT on July 24, 2015. The results are set out below and summarized in Table 1, below.

Following our audit, the consultants are satisfied that CMT is in compliance with a majority of the requirements within the scope of the audit; however, the PSP is not in compliance with respect of the provision of safety buttons passengers, as detailed below. The following deficiencies were also noted and have since been resolved: (1) the audit identified a discrepancy with the telephone number provided during the audit and that advertised on the company website (section 3.1.2); (2) the audit identified that insurance records, collected by fleets, were not available to the PSP (section 3.1.8); (3) the audit identified a potential error in data handling and transmission to Taxicab Data Management System (TDMS), see section 3.1.10; and (4) the audit was unable to access records using a common trip ID identifier. The PSP was technically able to provide DDS integration, but was not currently doing so.

As a result of the audit process the following recommendations were made, and feedback received, as set out below.

Recommendation: CMT should immediately update the contact information on their website to correspond with the telephone number provided to the consultants during the audit.

Response: *CMT has changed the information and, in addition, have ordered a "202" phone number that will be publicized once in service.*

Recommendations: CMT should make arrangements with their fleet operators to ensure insurance records are entered into the CMT system and be available on request. This action should be reported to the DCTC and demonstrated when complete.

Response: *CMT has added an Insurance field to their system and is in the process of updating information from fleet records,*

Recommendations: CMT should take immediate steps to remedy or explain issues identified in the reporting of data fields to the TDMS, including the addition of trip ID as a selection criteria and the apparent discrepancy between the collected and reported time information for pick ups and drop offs. This action should be undertaken as a matter of urgency and reported to the DCTC upon conclusion. It is further recommended that this element of the audit be repeated upon such a notification of completion.

Response: *CMT has investigated the cause of the discrepancy and will report back to the Commission with findings.*

Recommendation: CMT should implement a system of integration for DDS trips that would allow, at a minimum, the use of a push button to identify DDS trips, or a greater level of integration such as an API integration.

Response: *We technically support either, but would not implement anything less than a full integration. Our operators and fleets are legally obligated to use CMT as their sole payment provider, therefore all trip payments must be processed by CMT. This will require a full API integration.*

Recommendation: CMT should implement a safety feature as required in Title 31.

Response: *“We would need more details about how the safety feature is to work and who will be liable for any issues related to its use.”*

It is our recommendation that CMT undertake the actions listed above no later than three months from the date of the final version of this report.

Table 1: Audit Responses - CMT

Ref	Requirement	Initial Audit Finding	Feedback from PSP	Status
1	Demonstrate contract with operators	Demonstrated		In compliance
2	Local or free to call customer service	Demonstrated but differs from number stated on website	Has been resolved. New 202 number in use	In compliance
3	Process for storing business records	Demonstrated		In compliance
4	Process for archiving records	Demonstrated		In compliance
5	Copy of fee table	Demonstrated		In compliance
6	Records demonstrating payments	Demonstrated		In compliance
7	Vehicle Inventory	Demonstrated		In compliance
8	Operator Inventory	Demonstrated with the exception of insurance records	Has added field to capture insurance information	Not in compliance

Ref	Requirement	Initial Audit Finding	Feedback from PSP	Status
9	Demonstration of records for multiple companies where appropriate	Demonstrated		In compliance
10	Data set validation for sample day	Records shown but with discrepancy on time stamp, and unable to demonstrate using trip ID	Company will investigate issue with ID and time stamp, since resolved,.	In compliance
11	Contingency for failure of Information Storage	Demonstrated		In compliance
12	Contingency for failure of Information collection	Demonstrated		In compliance
13	Contingency for failure of Information transmittal	Demonstrated		In compliance
14	Statement of system for error identification	Demonstrated		In compliance
15	Statement of integration with third party DDS	Technically able to support API and push button integration, but not currently doing so		Not in compliance

In addition to the physical audit carried on premises, the PSP was asked to confirm that vehicles associated with the PSP were compliant in terms of the technical specification requirements of passenger consoles and on-board equipment, and that the vehicle was equipped with a compliant passenger safety feature. These are summarized in the table below.

Ref	Requirement	Audit Finding	Feedback from PSP	Status
16	In vehicle consoles in compliance with Title 31, (PIM / DIM), with a PIM display no less than seven (7 #) inches, and no greater than twelve (12 #) inches in size, and a DIM capable of electronic manifest or detailed messaging, or holding a written exemption thereto.	Confirmed by PSP		In compliance

Ref	Requirement	Audit Finding	Feedback from PSP	Status
17	<p>Safety feature</p> <ul style="list-style-type: none"> - triggered by a physical button or prominent screen icon; - available at all times when a passenger is inside the vehicle; - Send a real-time notification to the Office of Unified Communications that a taxicab passenger is reporting a threat to his or her safety; - Be operated discreetly and without interference by the operator; and - Incorporate features to prevent accidental or intentional misuse. 	The PSP does not include a safety feature as required.	The PSP would require details in respect of the functioning of the safety feature in order to implement it.	<p>Not in compliance</p> <p>See section 4.</p>

3.1.1 Contract

Aim: The aim of this requirement is to identify the nature of contract existing between the PSP and the operators. The PSP was to provide a copy of an agreement, contract or similar document between the PSP and operators for the delivery of payment services.

Response: A written contract was provided that was consistent with the requirements of Title 31.

Result: Compliant

3.1.2 Confirmation Telephone Number

Aim: The aim of this question was to ensure that calls could be received in relation to customer inquiries using a local or free to call number.

Response: The telephone number CMT provided for the audit was “(877) 268-2947.”

Additional information: The number provided was dialed and connected successfully.

Result: Compliant

3.1.3 Secure Storage of Business Records

Aim: The aim of this question was to demonstrate that the PSP had a secure system for storing and maintaining records for the stated minimum period as required by Title 31. In this instance we addressed the storage of payment records.

Response: Records and storage protocol was demonstrated. All records are stored under lock and key and are compliant with PCI standards.

Result: Compliant

3.1.4 Archiving of Business Records

Aim: To meet this requirement, the PSP must demonstrate that the PSP maintained a secure archive of its business records.

Response: CMT provided hard-copy records dating back to 2013.

Additional information: A random date was selected by the auditors and provided by the PSP. Records demonstrated for this date were corroborated both against payment and trips made, detailed further below.

Result: Compliant

3.1.5 Copy of Fee Table or Statement of Fees

Aim: To ensure that operators were aware of the fees they would be charged.

Response: CMT provided their statement of fees

Result: Compliant

3.1.6 Copies of Records Demonstrating Payments

Aim: This requirement ensures that a transaction originating as a trip fare and processed by a PSP can be traced from its original trip record to demonstrated payment to operator.

Response: CMT demonstrated a payment audit trail for two operators chosen at random by the consultants. The audit followed payment from a sample of trips to payment credit to operator.

Result: Compliant

3.1.7 Statement of Current Vehicle Inventory

Aim: To ensure that the PSP can identify all vehicles operating under its service.

Response: CMT provided a hard-copy of its vehicle inventory.

Result: Compliant

3.1.8 Operator Inventory

Aim: To ensure that the PSP can identify all operators operating under its service and their current status.

Response: CMT demonstrated its operator database. Insurance information is not captured by the PSP.

Additional Information: Collection of insurance records, particularly the validity and the expiry, appears to be a difficulty for most PSPs. In the case of CMT this responsibility is passed to fleet owners.

Result: Not Compliant.

3.1.9 Demonstration for Multiple Brands

Aim: To ensure that the PSP can identify all elements across its companies or brands.

Response: CMT demonstrated that its PSP services were available consistently across all of the brands it served.

Result: Compliant

3.1.10 Validation of Dataset Against TDMS data

Aim: To ensure that the PSP can validate data collection for all trip records. This section differentiates between data held by the PSP in the PSP's native systems, and the data received by the DCTC and processed using the TDMS system, with the requirement that both data collected by the PSP and that received by the TDMS system are the same.

Response: The consultants selected a random date, and requested a random sample of data fields that would normally be held in a native system. CMT demonstrated data that matched the requested sample, but was not able to sort nor fully validate records against the information held by the TDMS.

Additional Information: CMT was unable to call up records on the basis of trip IDs provided by the auditor. Records differed from those reported via TDMS and were, therefore, considered inaccurate. The difference relates to CMT records indicating pick up and drop off times one hour behind those recorded on TDMS.

Result: Not Compliant

3.1.11 Contingency Plan - Storage of Data

Aim: To ensure that the PSP has a strategy to address a failure in storage of data.

Response: CMT detailed and demonstrated its architecture. Data back up was based on the use of real time back up to two data centers.

Result: Compliant

3.1.12 Contingency Plan - Collection of Required Data

Aim: To ensure that the PSP has a strategy to address failure in collection of data.

Response: CMT detailed and demonstrated its contingency plan. This included addressing errors in transmission upon restoration of reception, local storage and recovery.

Result: Compliant

3.1.13 Contingency Plan - Transmittal of Required Data

Aim: To ensure that the PSP has a strategy to address failure in transmission of data.

Response: CMT demonstrated their approach to back up of data and its transmittal following system failure. The contingency plan includes a multi-carrier provision and a system to request data be provided from vehicle systems (pull system) where systems fail and are restored.

Result: Compliant

3.1.14 Monitoring of Data Input for Errors

Aim: To ensure that the PSP has a strategy to monitor for inconsistencies and errors within the collection of operational data

Response: CMT demonstrated their contingency plan in the event of error identification. The system includes data integrity checks to ensure consistent provision of accurate data.

Result: Compliant

3.1.15 Statement of Integration - Third Party DDS

Aim: To ensure that the PSP provided a method of integration for DDS trips into their system or reporting. This can take the form of either a DDS trip “button” that can be pushed for DDS trips, and/or a clear Application Protocol Interface (API) between the DDS and the PSP systems.

Response: The PSP is technically able to support API and push button integration, but not currently doing so.

Result: Not Compliant

3.1.16 Physical Equipment Compliance

Aim: To ensure that the PSP conforms with requirements for in vehicle equipment, based on the technical specifications set out in Title 31.

Response: The PSP confirmed that the in-vehicle equipment complied with required technical specifications.

Result: Compliant

3.1.17 Safety Features

Aim: To ensure that the PSP meet requirements for the provision of safety features and their minimum technical specifications set out in Title 31.

Response: The PSP does not currently provide a passenger safety feature, as required in Title 31.

Result: Not compliant

3.2 Audit Response - Hitch

A PSP audit was undertaken in the Washington D.C. offices of Hitch on July 27, 2015. The results are set out and summarized in Table 2 below.

At the time of the audit visit, the consultants were satisfied that Hitch is in compliance on most aspects included within the scope of the audit. The PSP was found to be non-compliant with the passenger safety feature requirement, see below. It was also identified that the PSP was not compliant in respect of integration with DDS trips, and had not demonstrated technical compliance of all elements of in vehicle equipment.

Per 3.2.10 the audit identified an error in the GPS coordinates in the PSP dataset.

Recommendations: Hitch should identify and rectify the cause of the error. We recommend that the audit team re-examine element 3.2.10 within a period of three months from the date of the final version of the report. Additionally, Hitch should ensure that it can provide passenger safety features as required by Title 31.

Response: *Hitch has provided an update to the data structure as set out in section 3.2.10, which meets the requirements of Title 31.*

The PSP does not provide a passenger safety feature, as required under the auspices October 31. In respect of Safety Equipment.

Response: The PSP indicated that in “... a teleconference on January 7, 2014, an in person meeting on March 20th, 2014, and follow-up correspondence there is still an outstanding issue of how the DCTC wants the alert system to communicate with the Office of Unified Communications (i.e. where to send an alert, and the format of the message & data).”

Recommendation: The PSP should implement a safety feature as required in Title 31.

Hitch has not demonstrated a functioning integration with DDS trips. In-vehicle equipment was demonstrated to be compliant for Passenger Information Modules (PIMs) and Operator Information Modules (DIMs). Hitch should ensure that all in vehicle equipment complies with Title 31 specifications.

Response: Hitch expressed concern that the issues of DDS integration and detail of the in-vehicle equipment specifications had not been included in the original audit.

Table 2: Audit responses - Hitch

Ref	Requirement	Initial Audit Finding	Feedback from PSP	Status
1	Demonstrate contract with operators	Demonstrated		In compliance
2	Local or free to call customer service	Demonstrated		In compliance
3	Process for storing business records	Demonstrated		In compliance
4	Process for archiving records	Demonstrated		In compliance
5	Copy of fee table	Demonstrated		In compliance
6	Records demonstrating payments	Demonstrated		In compliance
7	Vehicle Inventory	Demonstrated		In compliance
8	Operator Inventory	Demonstrated		In compliance
9	Demonstration of records for multiple companies where appropriate	Demonstrated		In compliance
10	Data set validation for sample day	Not Fully Demonstrated	Data updated, and demonstrated to Commission	In compliance
11	Contingency for failure of Information Storage	Demonstrated		In compliance
12	Contingency for failure of Information collection	Demonstrated		In compliance
13	Contingency for failure of Information transmittal	Demonstrated		In compliance
14	Statement of system for error identification	Demonstrated		In compliance
15	Statement of integration with third party DDS	Not demonstrated		Not in compliance

In addition to the physical audit conducted on the premises, the PSP was asked to confirm that vehicles associated with the PSP were compliant in terms of the technical specification of

passenger consoles and on board equipment, and that the vehicle was equipped with a compliant passenger safety feature. These findings are summarized in the table below.

Ref	Requirement	Audit Finding	Feedback from PSP	Status
16	In vehicle consoles in compliance with Title 31, (PIM / DIM), with a PIM display no less than seven (7 #) inches, and no greater than twelve (12 #) inches in size, and a DIM capable of electronic manifest or detailed messaging, or holding a written exemption thereto.	Confirmed by PSP		In compliance
17	Safety feature <ul style="list-style-type: none"> - triggered by a physical button or prominent screen icon; - available at all times when a passenger is inside the vehicle; - Send a real-time notification to the Office of Unified Communications that a taxicab passenger is reporting a threat to his or her safety; - Be operated discreetly and without interference by the operator; and - Incorporate features to prevent accidental or intentional misuse. 	The PSP does not provide a passenger safety feature as required.	The PSP indicated that the commission had not provided a method by which the system could communicate with the Office of Unified Communications	Not in compliance

3.2.1 Contract

Aim: The aim of this question was to identify the nature of contract existing between the PSP and the operators. PSP were to provide a copy of an agreement, contract or similar document between the PSP and operators for the delivery of payment services.

Response: Hitch provided three written documents, all current contracts for rental operators, and owners with different equipment rates. All were consistent with the requirements of Title 31.

Result: Compliant

3.2.2 Confirmation Telephone Number

Aim: The aim of this question was to ensure that calls could be received in relation to customer inquiries using a local or free to call number.

Response: The telephone number Hitch provided for purposes of the audit was “(202) 810-4482”

Additional information: The number provided was dialed and connected successfully.

Result: Compliant

3.2.3 Secure Storage of Business Records

Aim: The aim of this question was to demonstrate that the PSP had a secure system for storing and maintaining records for the stated minimum period required by Title 31. In this instance we addressed the storage of payment records.

Response: Hitch provided a statement detailing the secure storage of records, which are held under lock and key. All records are also scanned and held securely electronically.

Result: Compliant

3.2.4 Archiving of Business Records

Aim: This element requires the PSP to demonstrate that the PSP maintained a secure archive of its business records.

Response: Hitch provided hard copy records dating back to 2013.

Result: Compliant

3.2.5 Copy of Fee Table or Statement of Fees

Aim: To ensure that operators were aware of the levels of fees that they would be charged.

Response: Hitch submitted their statement of fees.

Result: Compliant

3.2.6 Copies of Records Demonstrating Payments

Aim: This requirement ensures that a transaction originating as a trip fare and processed by a PSP can be traced from its original trip record to demonstrated payment to operator.

Response: Hitch demonstrated a payment audit trail for two operators chosen at random by the consultants on their data system. Entries were verified and matched to operator payments.

Result: Demonstrated Successfully

3.2.7 Statement of Current Vehicle Inventory

Aim: To ensure that the PSP can identify all vehicles operating under its service.

Response: Hitch provided a hard-copy of its vehicle inventory.

Result: Compliant

3.2.8 Operator Inventory

Aim: To ensure that the PSP can identify all operators operating under its service and their current status.

Response: Hitch demonstrated its operator database which contained vehicle insurance and operator record checks.

Result: Compliant

3.2.9 Demonstration for Multiple Brands

Aim: To ensure that the PSP can identify all elements across its companies or brands.

Response: Hitch demonstrated for differing companies as requested by the consultants.

Result: Compliant

3.2.10 Validation of Dataset Against TDMS Data

Aim: To ensure that the PSP can demonstrate data collection for trip records in its native format, to coincide with data transmitted to the DCTC

Response: The consultants selected a random date, and requested a random sample of data fields that would normally be held in a native system. Hitch demonstrated data held for requested cells. With one exception associated with incorrect GPS coordinates, all other fields including address fields were correct.

Result: Not compliant

3.2.11 Contingency Plan - Storage of Data

Aim: To ensure that the PSP has a strategy to address failure in the storage of data.

Response: Hitch provided a written statement regarding this contingency.

Result: Compliant

3.2.12 Contingency Plan - Collection of Required Data

Aim: To ensure that the PSP has a strategy to address failure in the collection of data,

Response: Hitch provided a written statement regarding this contingency.

Result: Compliant

3.2.13 Contingency Plan - Transmittal of Required Data

Aim: To ensure that the PSP has a strategy to address a failure in transmission of data.

Response: Hitch provided a written statement regarding this contingency.

Result: Compliant

3.2.14 Monitoring of Data Input for Errors

Aim: To ensure that the PSP has a strategy to monitor for inconsistencies and errors within the collection of operational data

Response: Hitch provided a written statement regarding this contingency.

Result: Compliant

3.2.15 Statement of Integration - Third Party DDS

Aim: To ensure that the PSP provided a method of integration for DDS trips into their system or reporting. This could take the form of either DDS trip “button” that can be pushed for DDS trips and/or a clear Application Protocol Interface (API) between the DDS and the PSP systems.

Response: The PSP has not demonstrated integration

Result: Not compliant

3.2.16 Physical Equipment Compliance

Aim: To ensure that the PSP conforms with requirements for in vehicle equipment, based on the technical specifications set out in Title 31.

Response: The PSP confirmed that in-vehicle PIMs complied with technical specifications. The PSP has not demonstrated that DIM modules are compliant.

Result: Not compliant

3.2.17 Safety Features

Aim: To ensure that the PSP meet requirements for the provision of safety features and their minimum technical specifications set out in Title 31.

Response: the PSP does not currently provide a passenger side safety feature, as required in Title 31.

Result: Not compliant

3.3 Audit Response - Transco

A PSP audit was undertaken in the Washington D.C. offices of Transco Inc. on July 23, 2015. The results are summarized in Table 3 below.

The consultants were satisfied that Transco is in compliance with the majority of the aspects included within the scope of the audit. The PSP was found to be non-compliant with the passenger safety feature requirement (see below) and with a number of reporting functions, also described in the subsequent text.

The audit identified an issue in the reporting of data from the PSP native system to the TDMS, (see section 3.3.10). The issue related to an error within the native system, which is provided to the PSP by a third party, and identified that one data field was reporting inaccurate or incomplete data to the TDMS. The audit also identified errors with providing a contingency plan for failures in the storage of data (3.3.11), and for failures in the collection of data (3.3.12).

Response: The PSP indicated *"...we are communicating with [third party vendor] ...regarding the matters that were not fully demonstrated during the test. Once the matters have been resolved, we will follow up."*

A further response from the PSP was received confirming that the outstanding concerns highlighted had been reviewed and corrected. This was demonstrated as having been corrected by the audit team.

The PSP was unable to demonstrate that required passenger safety equipment had been installed.

Response: The PSP stated that safety systems were *"...currently only working for operator safety. Passenger system, PSP currently looking at a process" ...[for development]... "In agreement with the DCTC."*

Table 3: Audit responses – Transco

Ref	Requirement	Initial Audit Finding	Feedback from PSP	Status
1	Demonstrate contract with operators	Demonstrated		In compliance
2	Local or free to call customer service	Demonstrated		In compliance
3	Process for storing business records	Demonstrated		In compliance
4	Process for archiving records	Demonstrated		In compliance
5	Copy of fee table	Demonstrated		In compliance
6	Records demonstrating payments	Demonstrated		In compliance
7	Vehicle Inventory	Demonstrated		In compliance
8	Operator Inventory	Demonstrated with the exception of full insurance records		Not in compliance
9	Demonstration of records for multiple companies where appropriate	Demonstrated		In compliance
10	Data set validation for sample day	Error in one field in reporting to TDMS	Investigated and confirmed	In compliance
11	Contingency for failure of Information Storage	Nature of contract with third party vendor not apparent	Investigated and confirmed	In compliance
12	Contingency for failure of Information collection	Nature of contract with third party vendor not apparent	Investigated and confirmed	In compliance
13	Contingency for failure of Information transmittal	Demonstrated		In compliance
14	Statement of system for error identification	Demonstrated		In compliance
15	Statement of integration with third party DDS	Integration between the PSP system and DDS trips was not demonstrated		Not in compliance

In addition to the physical audit carried out on the premises, the PSP was asked to confirm that vehicles associated with the PSP were compliant in terms of the technical specification of

passenger consoles and on board equipment, and that the vehicle was equipped with a compliant safety feature. These are summarized in the table below.

Ref	Requirement	Audit Finding	Feedback from PSP	Status
16	In vehicle consoles in compliance with Title 31, (PIM / DIM), with a PIM display no less than seven (7 #) inches, and no greater than twelve (12 #) inches in size, and a DIM capable of electronic manifest or detailed messaging, or holding a written exemption thereto.	Confirmed by PSP		In compliance
17	Safety feature <ul style="list-style-type: none"> - triggered by a physical button or prominent screen icon; - available at all times when a passenger is inside the vehicle; - Send a real-time notification to the Office of Unified Communications that a taxicab passenger is reporting a threat to his or her safety; - Be operated discreetly and without interference by the operator; and - Incorporate features to prevent accidental or intentional misuse. 	The PSP were unable to demonstrate that appropriate passenger safety equipment had been installed.	The PSP stated <i>“Currently only working for operator safety.”</i>	Not in compliance

3.3.1 Contract

Aim: The aim of this question was to identify the nature of contract existing between the PSP and the operators. The PSP was to provide a copy of an agreement, contract or similar document drawn up as between PSP and operators for the delivery of payment services.

Response: Transco provided a copy of their written agreement which they held on file.

Additional information: Discussion with the PSP highlighted, and later demonstrated, that operators do received payment within 24 hours, though this was not explicit within the contract.

Result: Compliant

3.3.2 Confirmation Telephone Number

Aim: The aim of this question was to ensure that calls could be received in relation to customer inquiries, using a local or free to call number.

Response: The telephone number provided to the auditors by Transco was “(202) 398-0500.” This number was tested and confirmed to be valid number.

Result: Compliant

3.3.3 Secure Storage of Business Records

Aim: The aim of this question was to demonstrate that the PSP had a secure system for storing and maintaining records for the stated minimum period as required by Title 31. In this instance we addressed the storage of payment records.

Response: Transco provided both on-line and hard-copy records. The company described and demonstrated their system for storage of hard-copy records. Binders are kept under lock and key on their business premises. Electronic records were kept on behalf of the PSP by third party vendors.

Result: Compliant

3.3.4 Archiving of Business Records

Aim: This element requires the PSP to demonstrate that the PSP maintained a secure archive of its business records.

Response: Transco provided hard-copy records dating back to 2013.

Result: Compliant

3.3.5 Copy of Fee Table or Statement of Fees

Aim: To ensure that operators were aware of the levels of fees that they would be charged.

Response: Transco provided a copy of their fee table.

Result: Compliant

3.3.6 Copies of Records Demonstrating Payments

Aim: This requirement ensures that a transaction originating as a trip fare and processed by a PSP can be traced from its original trip record to demonstrated payment to operator.

Response: Transco demonstrated a payment audit trail for two operators chosen at random by the consultants. Entries were verified and matched with the summation of trip by trip record from beginning of the trip to end payment.

Result: Compliant

3.3.7 Statement of Current Vehicle Inventory

Aim: To ensure that the PSP can identify all vehicles operating under its service.

Response: Transco provided a hard-copy of its vehicle inventory.

Result: Compliant

3.3.8 Statement of Current Operator Inventory

Aim: To ensure that the PSP can identify all operators operating under its service, and their current status.

Response: Transco demonstrated its operator database using its on-line system for all of the fields specific to each operator.

Additional Information: Although insurance provider is listed, it was not possible to verify whether the insurance was current. Transco commented that to do so would require a change in external regulation to allow an interested party access to detailed insurance records.

Result: Not compliant

3.3.9 Demonstration for Multiple Brands

Aim: To ensure that the PSP can identify all elements across its companies or brands.

Response: Transco demonstrated for differing companies as requested by the consultants.

Result: Compliant

3.3.10 Validation of Dataset Against TDMS data

Aim: To ensure that the PSP can demonstrate data collection for trip records in its native format, to coincide with data transmitted to the DCTC

Response: The consultants selected a random day sample, and requested confirmation of a random sample of data fields that would normally be held in a native system. Transco provided data for requested cells, with the exception of a transmission error resulting in one character in the address field being omitted. This transmission error did not appear to be an error on the part of the PSP, but highlighted an area of potential concern between the PSP and the DCTC contractor CabConnect. It was unclear whether this error stemmed from the PSP or CabConnect. Not fully demonstrated at time of audit. The PSP subsequently demonstrated compliance by confirming details against a further sample provided by the audit team.

Result: Compliant

3.3.11 Contingency Plan - Storage of Data

Aim: To ensure that the PSP has a strategy to address failure in the storage of data,

Response: Transco commented on the nature of its storage, particularly that failure in systems would be required of their third party vendor. It was not possible to demonstrate the nature of this at the time of the audit. The PSP subsequently demonstrated its contingency plan to the audit team. Not fully demonstrated at time of audit, but subsequently confirmed

Result: Compliant

3.3.12 Contingency Plan - Collection of Required Data

Aim: To ensure that the PSP has a strategy to address failure in collection of data,

Response: Transco commented on the nature of its data collection. Collection would be maintained by vehicle based systems, with responsibility for back up lying with a third party vendor. It was not possible to demonstrate the nature of this contract to the audit team. Not fully demonstrated at time of audit, but subsequently confirmed

Result: Compliant

3.3.13 Contingency Plan - Transmittal of Required data

Aim: To ensure that the PSP has a strategy to address a failure in the transmission of data.

Response: The PSP provided a contingency plan.

Result: Compliant

3.3.14 Monitoring of Data Input for Errors

Aim: To ensure that the PSP has a strategy to monitor for inconsistencies and errors within the collection of operational data

Response: Transco demonstrated its approach to monitoring of data, including operator log-in and log-out procedures and data delivery. Errors would be identified at time of payment processing and would be checked on each occasion and re-entered if appropriate.

Result: Compliant

3.3.15 Statement of Integration - Third Party DDS

Aim: To ensure that the PSP provided a method of integration for DDS trips into their system or reporting. This could take the form of either a DDS trip “button” that can be pushed for DDS trips and/or a clear Application Protocol Interface (API) between the DDS and the PSP systems.

Response: The PSP has not demonstrated compliance

Result: Not compliant

3.3.16 Physical Equipment Compliance

Aim: To ensure that the PSP conforms with requirements for in vehicle equipment, based on the technical specifications set out in Title 31.

Response: The PSP confirmed that the in-vehicle equipment complied with the technical specifications required by Title 31.

Result: Compliant

3.3.17 Safety Features

Aim: To ensure that the PSP meet requirements for the provision of safety features and their minimum technical specifications set out in Title 31.

Response: The PSP does not currently provide a passenger side safety feature as required by Title 31.

Result: Not compliant

3.4 Audit Response - UVC

A PSP audit was undertaken in the Washington D.C. offices of UVC on July 22, 2015. The results are set out and summarized in Table 4 below. UVC was found to be in compliance in the majority of requirements. The PSP was found to be non-compliant in its integration with DDS trips and only partly compliant in the provision of a passenger safety feature. The PSP Operator Inventory is unable to demonstrate that all insurance records are current. The UVC safety feature currently informs the taxi operator of activation of the safety button. The PSP indicated:

“We put the [passenger emergency] button in the lower right area of the screen with an icon not necessarily associated with emergency. The operator has to press another location typically in the top left corner of the screen to authenticate the touch on the Panic button.

To our knowledge, no city has implemented a panic button on the passenger terminal in case presumably the passenger is threatened by the operator. More likely is there will be a large number of false alarms due to intentional nuisance touches. The button would need an emergency symbol to be usable by passengers and we are concerned passengers on exit would touch the button to annoy the operator or to just be troublesome. We strongly recommend not implementing the passenger panic button unless there is empirical evidence that it is effective and not abused.

Additionally, regarding the online interface to 911 emergency systems, we asked DCTC and 911 Emergency organization for interface documents about 18 to 24 months ago. We were told by the 911 Emergency organization that this did not exist and it was not possible for us to interface to them. We did not pursue this further.”

It is recommended that the DCTC work with all PSPs to develop a defined protocol for safety feature activation and response.

Table 4: Audit responses - UVC

Ref	Requirement	Initial Audit Finding	Feedback from PSP	Status
1	Demonstrate contract with operators	Demonstrated		In compliance
2	Local or free to call customer service	Demonstrated		In compliance
3	Process for storing business records	Demonstrated		In compliance

Ref	Requirement	Initial Audit Finding	Feedback from PSP	Status
4	Process for archiving records	Demonstrated		In compliance
5	Copy of fee table	Demonstrated		In compliance
6	Records demonstrating payments	Demonstrated		In compliance
7	Vehicle Inventory	Demonstrated		In compliance
8	Operator Inventory	Demonstrated with the exception of full insurance records		Not in compliance
9	Demonstration of records for multiple companies where appropriate	Demonstrated		In compliance
10	Data set validation for sample day	Demonstrated		In compliance
11	Contingency for failure of Information Storage	Demonstrated		In compliance
12	Contingency for failure of Information collection	Demonstrated		In compliance
13	Contingency for failure of Information transmittal	Demonstrated		In compliance
14	Statement of system for error identification	Demonstrated		In compliance
15	Statement of integration with third party DDS	Integration between the PSP system and DDS trips was not demonstrated		Not in compliance

In addition to the physical audit carried out on the premises, the PSP was asked to confirm that vehicles associated with the PSP were compliant in terms of technical specification requirements for passenger consoles and on board equipment, and that the vehicle was equipped with a compliant safety feature. These results are summarized in the table below.

Ref	Requirement	Audit Finding	Feedback from PSP	Status
16	In vehicle consoles in compliance with Title 31, (PIM / DIM), with a PIM display no less than seven (7 #) inches, and no greater than twelve (12 #) inches in size, and a DIM capable of electronic manifest or detailed messaging, or holding a written exemption thereto.	Confirmed by PSP		In compliance
17	<p>Safety feature</p> <ul style="list-style-type: none"> - triggered by a physical button or prominent screen icon; - available at all times when a passenger is inside the vehicle; - Send a real-time notification to the Office of Unified Communications that a taxicab passenger is reporting a threat to his or her safety; - Be operated discreetly and without interference by the operator; and - Incorporate features to prevent accidental or intentional misuse. 	UVC only partially fulfills the requirements for a passenger safety feature, by providing a panic button that would then require operator action.	<i>"We put the button in the lower right area of the screen with an icon not necessarily associated with emergency. The operator has to press another location typically in the top left corner of the screen to authenticate the touch on the Panic button."</i>	Not in compliance

3.4.1 Contract

Aim: The aim of this question was to identify the nature of contract existing between the PSP and the operators. The PSP was to provide a copy of an agreement, contract or similar document drawn up as between PSP and operators for the delivery of payment services.

Response: A written contract was provided that was consistent with the requirements of Title 31.

Additional Information: Discussion with the PSP highlighted that the majority of operators preferred to be paid on a weekly basis, although the PSP suggests that daily payment was possible. An addendum to the original contract was also shown where operators choose to accept seven-day payment cycles.

Result: Compliant

3.4.2 Confirmation Telephone Number

Aim: The aim of this question was to ensure that calls could be received in relation to customer inquiries, using a local or free to call number.

Response: UVC provided their number to the audit, (202) 269-1100

Result: Compliant

3.4.3 Secure Storage of Business Records

Aim: The aim of this question was to demonstrate that the PSP had a secure system for storing and maintaining records for the stated minimum period required by Title 31. In this instance we addressed the storage of payment records.

Response: A written statement was provided detailing the secure storage of records. Previous records were produced to demonstrate the format of records held.

Result: Compliant

3.4.4 Archiving of Business Records

Aim: This question provides a follow up to that set out in 3.3. The aim of this question was to demonstrate that the PSP maintained a secure archive of its business records.

Response: UVC demonstrated hard-copy records dated to 2013.

Result: Compliant

3.4.5 Copy of Fee Table or Statement of Fees

Aim: To ensure that operators were aware of the levels of fees that they would be charged.

Response: UVC demonstrated their statement of fees which was contained within their contract.

Result: Compliant

3.4.6 Copies of Records Demonstrating Payments

Aim: To ensure that an audit trail exists from a native trip dataset from the beginning of trip through to payment to operator.

Response: UVC demonstrated a payment audit trail for two operators chosen at random by the consultants. Entries were matched and verified with the summation of trip by trip record.

Result: Compliant

3.4.7 Statement of Current Vehicle Inventory

Aim: To ensure that the PSP can identify all vehicles operating under its service.

Response: UVC provided a hard-copy of its vehicle inventory.

Result: Compliant

3.4.8 Statement of Current Operator Inventory

Aim: To ensure that the PSP can identify all operators operating under its service and their current status.

Response: UVC provided its operator database which contained insurance information and operator record checks. The operator inventory was unable to demonstrate the status of third party insurance.

Result: Not compliant

3.4.9 Demonstration for Multiple Brands

Aim: To ensure that the PSP can identify all elements across its companies or brands.

Response: UVC demonstrated for differing companies as requested by the consultants.

Result: Compliant

3.4.10 Validation of Dataset Against TDMS data

Aim: To ensure that the PSP can demonstrate data collection for trip records in its native format, to coincide with data transmitted to the DCTC

Response: The consultants selected a random day sample, and requested confirmation of a random sample of data fields that would normally be held in a native system. UVC demonstrated data held for requested cells

Result: Compliant

3.4.11 Contingency Plan - Storage of Data

Aim: To ensure that the PSP has a strategy to address a failure in storage of data.

Response: UVC demonstrated their architecture to the consultants and demonstrated the back-up system of real time back-up at two data centers.

Result: Compliant

3.4.12 Contingency Plan - Collection of Required Data

Aim: To ensure that the PSP has a strategy to address a failure in collection of data.

Response: UVC provided a verbal description of their systems and demonstrated the back-up architecture specific to failures in reception.

Result: Compliant

3.4.13 Contingency Plan - Transmittal of Required Data

Aim: To ensure that the PSP has a strategy to address a failure in transmission of data.

Response: UVC demonstrated their approach to backing up its data and the transmittal of data following a system failure.

Result: Compliant

3.4.14 Monitoring of Data Input for errors

Aim: To ensure that the PSP has a strategy to monitor for inconsistencies and errors within the collection of operational data

Response: UVC demonstrated their approach to verifying data, which occurs weekly to coincide with its seven-day payment structure. UVC's approach to updates were also outlined successfully.

Result: Compliant

3.4.15 Statement of Integration - Third Party DDS

Aim: To ensure that the PSP provided a method of integration for DDS trips into their system or reporting. This could take the form of either demonstration of a DDS trip “button” that can be pushed for DDS trips, and/or a clear Application Protocol Interface (API) between the DDS and the PSP systems.

Response: The PSP has not demonstrated integration

Result: Not compliant

3.4.16 Physical Equipment Compliance

Aim: To ensure that the PSP conforms with requirements for in vehicle equipment, based on the technical specifications set out in Title 31.

Response: The PSP confirmed that the in-vehicle equipment complied with technical specifications required by Title 31.

Result: Compliant

3.4.17 Safety Features

Aim: To ensure that the PSP meet requirements for the provision of safety features and their minimum technical specifications set out in Title 31.

Response: The PSP does provide a safety feature as described in section 3.4 above, but this fails to meet the requirements Title 31 as UVC’s system requires operator intervention.

Result: Not compliant

3.5 Audit Response - Verifone

A PSP audit was undertaken in the Washington D.C. offices of Verifone on July 22, 2015. The results are summarized in Table 5, below.

The consultants are satisfied that Verifone is in compliance with a majority of the aspects included within the scope of the audit. Verifone did not provide a copy of a contract with an operator on the basis of confidentiality concerns (section 3.5.1). Verifone did not provide a full audit trail of operator's payment (section 3.5.6). Verifone was unable to demonstrate data against a trip ID (section 3.5.10). Verifone was also unable to demonstrate an operational passenger safety feature as detailed in section 3.5.17 below.

Recommendations: Verifone should provide a redacted version of the contract and for review by the audit team. Verifone should provide a corresponding operator payment record to match the sample provided during the audit which will be reviewed by the audit team. Verifone should also ensure that data is available and may be referenced using a Trip ID. Verifone should work with DCTC to ensure the provision of a functioning passenger safety feature as required by Title 31.

Response: Verifone provided detailed information in areas where responses had not demonstrated compliance with the requirements of Title 31. At the time of this report, all elements with the exception of section 3.5.1, contracts, have been successfully demonstrated.

Audit staff member, Dr. James Cooper, was recused from the audit with Verifone.

Table 5: Audit responses - Verifone

Ref	Requirement	Initial Audit Finding	PSP Feedback	Status
1	Demonstrate contract with operators	Not Demonstrated	Would seek legal advice given proprietary nature of contract	Not in compliance.
2	Local or free to call customer service	Demonstrated		In compliance
3	Process for storing business records	Demonstrated		In compliance

Ref	Requirement	Initial Audit Finding	PSP Feedback	Status
4	Process for archiving records	Partially demonstrated. PSP demonstrated records for a different year than requested	Would seek additional material to demonstrated compliance	In compliance
5	Copy of fee table	Demonstrated		In compliance
6	Records demonstrating payments	Partially demonstrated. PSP did not provide a operator side record	Would seek additional material to demonstrated compliance	In compliance
7	Vehicle Inventory	Demonstrated		In compliance
8	Operator Inventory	Demonstrated		In compliance
9	Demonstration of records for multiple companies where appropriate	Demonstrated		In compliance
10	Data set validation for sample day	Partially demonstrated. PSP could not demonstrate record using Trip ID	Would seek additional material to demonstrated compliance, since demonstrated	In compliance
11	Contingency for failure of Information Storage	Demonstrated		In compliance
12	Contingency for failure of Information collection	Demonstrated		In compliance
13	Contingency for failure of Information transmittal	Demonstrated		In compliance
14	Statement of system for error identification	Demonstrated		In compliance
15	Statement of integration with third party DDS	Not Demonstrated	VeriFone is planning to release a DDS application in DC that will enable an end to end hailing and payment through the mobile application. There will be a message on the	Not in compliance

Ref	Requirement	Initial Audit Finding	PSP Feedback	Status
			screen indicating the trip will be paid through the application. There will also be an option to for passengers to pay through the application even if the cab was not hailed using the app, this will be done through a code that is displayed on the screen which connect the trip to the passenger account in the app.	

In addition to the physical audit conducted on premises, the PSP was asked to confirm that the vehicles associated with the PSP were compliant in terms of technical specification required for passenger consoles and on board equipment, and that the vehicle was equipped with a compliant safety feature. The results are summarized in table below.

Ref	Requirement	Audit Finding	Feedback from PSP	Status
16	In vehicle consoles in compliance with Title 31, (PIM / DIM), with a PIM display no less than seven (7 #) inches, and no greater than twelve (12 #) inches in size, and a DIM capable of electronic manifest or detailed messaging, or holding a written exemption thereto.	Confirmed by PSP		In compliance

Ref	Requirement	Audit Finding	Feedback from PSP	Status
17	<p>Safety feature</p> <ul style="list-style-type: none"> - triggered by a physical button or prominent screen icon; - available at all times when a passenger is inside the vehicle; - Send a real-time notification to the Office of Unified Communications that a taxicab passenger is reporting a threat to his or her safety; - Be operated discreetly and without interference by the operator; and <p>Incorporate features to prevent accidental or intentional misuse.</p>	<p>The PSP was unable to demonstrate an operational safety feature.</p>	<p><i>“we are aware of the regulation and we have requested for a technical specification from the DCTC in order to implement it. The answer we got is that the DCTC is working on this and will share it with us as soon as it will be ready. Until now we have not received any specification and thus are not able to implement it.”</i></p>	<p>Not in compliance</p> <p>See section 4.5</p>

3.5.1 Contract

Aim: The aim of this question was to identify the nature of contracts existing between the PSP and the companies and operators. The PSP was to provide a copy of an agreement, contract or similar document drawn up as between PSP and operators for the delivery of payment services. It is noted that Verifone provides a B2B service alone.

Response: Verifone declined to provide a copy of their agreement.

Additional information: Verifone expressed concerns related to the confidentiality of the contract between Verifone and its customers. The information was felt to be proprietary. Verifone indicated that it would seek legal advice as to whether a redacted version may be made available.

Result: Not compliant

3.5.2 Confirmation Telephone Number

Aim: The aim of this question was to ensure that calls could be received in relation to customer inquiries using a local or free to call number.

Response: Verifone provided the auditors with their number (866) 638-3688 which was tried successfully.

Result: Compliant

3.5.3 Secure Storage of Business Records

Aim: The aim of this question was to demonstrate that the PSP had a secure system for storing and maintaining records for the stated minimum period required by Title 31. In this instance we addressed the storage of payment records.

Response: Verifone demonstrated that all records are held securely and that it is compliant with on-line security protocols.. Hard-copy records are held securely in the financial business office under lock and key.

Result: Compliant

3.5.4 Archiving of Business Records

Aim: This element requires the PSP to demonstrate that the PSP maintained a secure archive of its business records.

Response: Verifone provided hard-copy records dating back to 2012.

Result: Compliant

3.5.5 Copy of Fee Table or Statement of Fees

Aim: To ensure that operators were aware of the levels of fees that they would be charged.

Response: Verifone provided their statement of fees for the Washington D.C. market.

Result: Compliant

3.5.6 Copies of Records Demonstrating Payments

Aim: This requirement ensures that a transaction originating as a trip fare and processed by a PSP can be traced from its original trip record to demonstrated payment to operator.

Response: Verifone submitted a payment record for dated July 21, 2015 but did not provide a operator record for that date. The PSP stated that they would provide this record, and have subsequently presented records to the commission.

Result: Compliant

3.5.7 Statement of Current Vehicle Inventory

Aim: To ensure that the PSP can identify all vehicles operating under its service.

Response: Verifone provided a copy of its vehicle inventory.

Result: Compliant

3.5.8 Statement of Current Operator Inventory

Aim: To ensure that the PSP can identify all operators operating under its service and their current status.

Response: Verifone demonstrated its operator database which included insurance and operator record checks.

Additional Information: Insurance information is captured at the time of installation.

Result: Compliant

3.5.9 Demonstration for Multiple Brands

Aim: To ensure that the PSP can identify all elements across its companies or brands

Response: Verifone demonstrated for differing companies as requested by the consultants

Result: Compliant

3.5.10 Validation of Dataset Against TDMS Data

Aim: To ensure that the PSP can show data collection for trip records in its native format to coincide with data transmitted to the DCTC.

Response: Verifone demonstrated its datasets to the audit, but was unable to search records using the common trip ID identification. This has subsequently been rectified

Result: Compliant

3.5.11 Contingency Plan - Storage of Data

Aim: To ensure that the PSP has a strategy to address a failure in storage of data,

Response: Verifone detailed and demonstrated its contingency plan architecture.

Result: Compliant

3.5.12 Contingency Plan - Collection of Required Data

Aim: To ensure that the PSP has a strategy to address failure in collection of data,

Response: Verifone detailed and demonstrated its contingency plan architecture.

Result: Compliant

3.5.13 Contingency Plan - Transmittal of Required Data

Aim: To ensure that the PSP has a strategy to address a failure in transmission of data.

Response: Verifone detailed and demonstrated its contingency plan architecture.

Result: Compliant

3.5.14 Monitoring of Data Input for Errors

Aim: To ensure that the PSP has a strategy to monitor for inconsistencies and errors within the collection of operational data

Response: Verifone detailed and demonstrated its contingency plan architecture. Trips that are not flagged as successfully transmitted are marked and three attempts made to resend.

Result: Compliant

3.5.15 Statement of Integration - Third Party DDS

Aim: To ensure that the PSP provided a method of integration for DDS trips into their system or reporting. This can take the form of either a DDS trip “button” that can be pushed for DDS trips, and/or a clear Application Protocol Interface (API) between the DDS and the PSP systems.

Response: The PSP has not demonstrated this integration, but provided the following statement: “VeriFone is planning to release a DDS application in DC that will enable an end to end hailing and payment through the mobile application. There will be a message on the screen indicating the trip will be paid through the application.

There will also be an option to for passengers to pay through the application even if the cab was not hailed using the app, this will be done through a code that is displayed on the screen which connect the trip to the passenger account in the app.”

Result: Not compliant

3.5.16 Physical Equipment Compliance

Aim: To ensure that the PSP conforms with requirements for in vehicle equipment, based on the technical specifications set out in Title 31.

Response: The PSP confirmed and verified that in-vehicle equipment complied with technical specifications as required by Title 31.

Result: Compliant

3.5.17 Safety Features

Aim: To ensure that the PSP meet requirements for the provision of safety features and their minimum technical specifications set out in Title 31.

Response: The PSP does not currently provide a passenger side safety feature as required by Title 31.

Result: Not compliant

3.6 Audit Response - VIP

A PSP audit was undertaken in the Washington D.C. offices of VIP on July 24, 2015. The results are summarized in table 6 below.

At the time of the audit visit, the consultants were satisfied that the PSP was in compliance on most aspects included within the scope of the audit. The PSP was found to be non-compliant with the passenger safety feature requirement (see below).

The PSP was also not in compliance in that the VIP contract does not explicitly state the ability for a operator to be paid more frequently than once every seven days.

Recommendations: VIP should update their contract or issue a contract addendum to state that payment within 24 hours is possible. This update or addendum should be submitted to the DCTC as soon as possible. VIP should also work with the DCTC to ensure that a passenger safety feature is made available, and that DDS trips are integrated.

Table 6: Audit responses - VIP

Ref	Requirement	Initial Audit Finding	Feedback from PSP	Status
1	Demonstrate contract with operators	Partially Demonstrated. PSP could not demonstrate ability for operators to be paid within 24 hours within contract.	None received	Not in compliance
2	Local or free to call customer service	Demonstrated		In compliance
3	Process for storing business records	Demonstrated		In compliance
4	Process for archiving records	Demonstrated		In compliance
5	Copy of fee table	Demonstrated		In compliance
6	Records demonstrating payments	Demonstrated		In compliance
7	Vehicle Inventory	Demonstrated		In compliance
8	Operator Inventory	Demonstrated with the exception of operator insurance where held with third party	It is difficult and may not be possible to obtain insurance records from third parties	Not in compliance

Ref	Requirement	Initial Audit Finding	Feedback from PSP	Status
9	Demonstration of records for multiple companies where appropriate	Demonstrated		In compliance
10	Data set validation for sample day	Demonstrated with the exception of use of trip ID		Not in compliance
11	Contingency for failure of Information Storage	Demonstrated		In compliance
12	Contingency for failure of Information collection	Demonstrated		In compliance
13	Contingency for failure of Information transmittal	Demonstrated		In compliance
14	Statement of system for error identification	Demonstrated		In compliance
15	Statement of integration with third party DDS	Demonstrated	PSP uses DDS button for integration.	In compliance

In addition to the physical audit carried out on premises, the PSP was asked to confirm that vehicles associated with the PSP were compliant in terms of technical specification of the passenger consoles and on board equipment, and that the vehicle was equipped with a compliant safety feature. These are summarized in table below.

Ref	Requirement	Audit Finding	Feedback from PSP	Status
16	In vehicle consoles in compliance with Title 31, (PIM / DIM), with a PIM display no less than seven (7 #) inches, and no greater than twelve (12 #) inches in size, and a DIM capable of electronic manifest or detailed messaging, or holding a written exemption thereto.	Confirmed by PSP		In compliance

Ref	Requirement	Audit Finding	Feedback from PSP	Status
17	<p>Safety feature</p> <ul style="list-style-type: none"> - triggered by a physical button or prominent screen icon; - available at all times when a passenger is inside the vehicle; - Send a real-time notification to the Office of Unified Communications that a taxicab passenger is reporting a threat to his or her safety; - Be operated discreetly and without interference by the operator; and - Incorporate features to prevent accidental or intentional misuse. 	The PSP does not currently provide a safety feature.	No response	<p>Not in compliance</p> <p>See section 4.5</p>

3.6.1 Contract

Aim: The aim of this question was to identify the nature of contract existing between the PSP and the operators. The PSP was to provide a copy of an agreement, contract or similar document drawn up as between PSP and operators for the delivery of payment services.

Response: VIP provided a written document that was consistent with the requirements of Title 31 with one exception. Title 31 requires payment to companies or independent owners within 24 hours or one business day. Similar to other PSPs, VIP offers payment on a weekly basis and this is written into the contract. The company demonstrated to the auditors that payment is made on a more frequent basis to operators who request this. The opportunity to receive payment more frequently is not currently defined in the PSP contract.

Result: Not compliant

3.6.2 Confirmation Telephone Number

Aim: The aim of this question was to ensure that calls could be received in relation to customer inquiries, using a local or free to call number.

Response: The number VIP provided to the auditors was (202) 269-9000. This number was tested and determined to be a valid number.

Result: Compliant

3.6.3 Secure Storage of Business Records

Aim: The aim of this question was to demonstrate that the PSP had a secure system for storage and maintaining records for the stated minimum period as detailed in Title 31. In this instance, we addressed the storage of payment records.

Response: A statement was provided detailing the secure storage of records, which are held under lock and key in the company's Landover, MD office for six months after which time they are held in secure archives for five years. Records were produced to show the format of records held. Data records are also held securely as detailed in later questions.

Result: Compliant

3.6.4 Archiving of Business Records

Aim: This requires the PSP to demonstrate that the PSP maintained a secure archive of its business records.

Response: VIP provided hard copy records dating back to 2013.

Result: Compliant

3.6.5 Copy of Fee Table or Statement of Fees

Aim: To ensure that operators were aware of the levels of fees that they would be charged.

Response: VIP provided their statement of fees which was contained within their contract.

Result: Compliant

3.6.6 Copies of Records Demonstrating Payments

Aim: This requirement ensures that a transaction originating as a trip fare and processed by a PSP can be traced from its original trip record to demonstrated payment to operator.

Response: VIP demonstrated a payment audit trail for two operators chosen at random by the consultants on their data system. Entries were matched according through the summation of trip by trip record to end payment.

Result: Compliant

3.6.7 Statement of Current Vehicle Inventory

Aim: To ensure that the PSP can identify all vehicles operating under its service.

Response: VIP provided a hard copy of its vehicle inventory.

Result: Compliant

3.6.8 Statement of Current Operator Inventory

Aim: To ensure that the PSP can identify all operators operating under its service and their current status.

Response: VIP demonstrated its operator database which included insurance and operator record check. The PSP was not able to access insurance status information where this was held by third part insurers.

Result: Not compliant

3.6.9 Demonstration for Multiple Brands

Aim: To ensure that the PSP can identify all elements across its companies or brands

Response: VIP demonstrated for differing companies as requested by the consultants

Result: Compliant

3.6.10 Validation of Dataset Against TDMS data

Aim: To ensure that the PSP can demonstrate data collection for trip records in its native format, to coincide with data transmitted to the DCTC

Response: The consultants selected a random day sample, and requested confirmation of a random sample of data fields that would normally be held in a native system. VIP demonstrated data held for requested cells, but could not identify records using a trip ID.

Result: Not compliant

3.6.11 Contingency Plan - Storage of Data

Aim: To ensure that the PSP has a strategy to address a failure in storage of data,

Response: VIP detailed and demonstrated its redundant data structure.

Result: Compliant

3.6.12 Contingency Plan - Collection of Required Data

Aim: To ensure that the PSP has a strategy to address a failure in collection of data,

Response: VIP detailed and demonstrated its contingency plan as it relates to the restoration from the same dataset and secure data storage, as well as secure hard copy storage.

Result: Compliant

3.6.13 Contingency Plan - Transmittal of Required Data

Aim: To ensure that the PSP has a strategy to address failure in transmission of data,

Response: VIP demonstrated their approach to back up and its transmittal following system failure. This included multiple transmission attempts from the DIM, error logging and multiple frequency use. A fail safe chip back up is also held.

Result: Compliant

3.6.14 Monitoring of Data Input for Errors

Aim: To ensure that the PSP has a strategy to monitor for inconsistencies and errors within the collection of operational data

Response: VIP detailed and demonstrated error identification, including the use of reverse geocoding in the event of partial data capture for locations.

Result: Compliant

3.6.15 Statement of Integration - Third Party DDS

Aim: To ensure that the PSP provided a method of integration for DDS trips into their system or reporting. This to take the form of either demonstration of a DDS trip 'button' that can be pushed for DDS trips, and/or a clear Application Protocol Interface (API) between the DDS and the PSP systems.

Response: The PSP provides integration using a DDS button.

Result: Compliant.

3.6.16 Physical Equipment Compliance

Aim: To ensure that the PSP conforms with requirements for in vehicle equipment, based on the technical specifications set out in Title 31.

Response: the PSP confirmed and that in the vehicle equipment comply with technical specifications acquired thereof.

Result: Compliant

3.6.17 Safety Features

Aim: To ensure that the PSP meet requirements for the provision of safety features and their minimum technical specifications set out in Title 31.

Response: the PSP does not currently provide a passenger side safety feature, as required in Title 31.

Result: Not compliant

3.7 Audit Response - Yellowcab of DC

A PSP audit was undertaken in the Washington D.C. offices of Yellowcab (“Yellow”) on July 21, 2015. The results are set summarized in Table 7 below.

The PSP was unable to demonstrate operational passenger safety feature, discussed in section 3.7.17. It is our recommendation that the PSP work with the DCTC to ensure the provision of this feature.

The PSP was unable to demonstrate insurance records for operators where these were held by third party insurers. It is our recommendation that the PSP work with DCTC to identify a method of obtaining third party insurance records.

Table 7: Audit responses - VIP

Ref	Requirement	Initial Audit Finding	Feedback from PSP	Status
1	Demonstrate contract with operators	Demonstrated		In compliance
2	Local or free to call customer service	Demonstrated		In compliance
3	Process for storing business records	Demonstrated		In compliance
4	Process for archiving records	Demonstrated		In compliance
5	Copy of fee table	Demonstrated		In compliance
6	Records demonstrating payments	Demonstrated		In compliance
7	Vehicle Inventory	Demonstrated		In compliance
8	Operator Inventory	Demonstrated with the exception of insurance records held by third party insurers	Insurance validity is noted as difficult to confirm in some instances of third party insurers.	Not in compliance
9	Demonstration of records for multiple companies where appropriate	Demonstrated		In compliance
10	Data set validation for sample day	Demonstrated		In compliance

Ref	Requirement	Initial Audit Finding	Feedback from PSP	Status
11	Contingency for failure of Information Storage	Demonstrated		In compliance
12	Contingency for failure of Information collection	Demonstrated		In compliance
13	Contingency for failure of Information transmittal	Demonstrated		In compliance
14	Statement of system for error identification	Demonstrated		In compliance
15	Statement of integration with third party DDS	Demonstrated		In compliance

In addition to the physical audit carried out on premises, the PSP was asked to confirm that vehicles associated with the PSP were compliant in terms of the technical specification of passenger consoles and on board equipment, and that the vehicle was equipped with a compliant safety feature. These are summarized in the table below.

Ref	Requirement	Audit Finding	Feedback from PSP	Status
16	In vehicle consoles in compliance with Title 31, (PIM / DIM), with a PIM display no less than seven (7 #) inches, and no greater than twelve (12 #) inches in size, and a DIM capable of electronic manifest or detailed messaging, or holding a written exemption thereto.	Confirmed by PSP	We have a written exemption granted under special conditions by the previous administration which we have fully met and complied with.	Granted Exemption

Ref	Requirement	Audit Finding	Feedback from PSP	Status
17	<p>Safety feature</p> <ul style="list-style-type: none"> - triggered by a physical button or prominent screen icon; - available at all times when a passenger is inside the vehicle; - Send a real-time notification to the Office of Unified Communications that a taxicab passenger is reporting a threat to his or her safety; - Be operated discreetly and without interference by the operator; and - Incorporate features to prevent accidental or intentional misuse”; 	<p>Yellow cab was unable to demonstrate an operational passenger safety feature.</p>	<p>In respect of the safety feature the Yellow indicated: <i>“all associated PSP vehicles have a discrete safety device installed on the operator information module (DIM). There is no safety device installed on the PIM as described in 603.8 N (3). Emergency rule making passed on 8/12/15 section 510.5 states that each company shall provide one or more safety devices to conform to the equipment standards of 603.8 N(3) including a device which provides for operator safety”</i></p>	<p>Not in compliance</p> <p>See section 4.5</p>

3.7.1 Contract

Aim: The aim of this question was to identify the nature of contract existing between the PSP and the operators. The PSP would provide a copy of an agreement, contract or similar document drawn up as between PSP for the delivery of payment services.

Response: Yellow provided detailed written documents complying with the requirements of Title 31.

Result: Compliant

3.7.2 Confirmation Telephone Number

Aim: The aim of this question was to ensure that calls could be taken in relation to customer enquiries, using a local or free to call number.

Response: The telephone number Yellow provided to the auditors was (202) 544-1212

Result: Compliant

3.7.3 Secure Storage of Business Records

Aim: The aim of this question was to demonstrate that the PSP had a secure system for storing and maintaining records for the stated minimum period as required by Title 31. In this instance we addressed the storage of payment records.

Response: Yellow provided a written statement regarding the secure storage of records and demonstrated a secure “redundant” system architecture for electronic records.

Result: Compliant

3.7.4 Archiving of Business Records

Aim: The requires the PSP to demonstrate that the PSP maintained a secure archive of its business records.

Response: Yellow demonstrated hard copy records dated to 2013.

Result: Compliant

3.7.5 Copy of Fee Table or Statement of Fees

Aim: To ensure that operators were aware of the levels of fees that they would be charged.

Response: Yellow demonstrated their statement of fees

Result: Compliant

3.7.6 Copies of Records Demonstrating Payments

Aim: To ensure that an audit trail exists from a native trip dataset through to payment made to operator.

Response: Yellow demonstrated a payment audit trail. The company demonstrated transactions which were corroborated against operator payment.

Result: Compliant

3.7.7 Statement of Current Vehicle Inventory

Aim: To ensure that the PSP can identify all vehicles operating under its service.

Response: Yellow stated that their vehicle inventory was transmitted via TDMS to the DCTC and this was corroborated on the TDMS system.

Result: Compliant

3.7.8 Statement of Current Operator Inventory

Aim: To ensure that the PSP can identify all operators operating under its service, and their current status.

Response: Yellow demonstrated its operator database on its system. Records included details of operators' status including insurance status.

Additional Information: Insurance validity is noted as difficult to confirm in some instances of third party insurers.

Result: Not compliant

3.7.9 Demonstration for Multiple Brands

Aim: To ensure that the PSP can identify all elements across its companies or brands

Response: Yellow operates as a single brand

Result: Compliant

3.7.10 Validation of Dataset Against TDMS data

Aim: To ensure that the PSP can demonstrate data collection for trip records in its native format, to coincide with data transmitted to the DCTC.

Response: The consultants selected a random day sample, and requested confirmation of a random sample of data fields that would normally be held in a native system. Yellow demonstrated data held for requested cells.

Result: Compliant

3.7.11 Contingency Plan - Storage of Data

Aim: To ensure that the PSP has a strategy to address a failure in storage of data.

Response: Yellow provided a written guide for contingency planning and demonstrated a redundancy system.

Result: Compliant

3.7.12 Contingency Plan - Collection of Required Data

Aim: To ensure that the PSP has a strategy to address a failure in collection of data.

Response: Yellow provided a written guide to contingency planning and demonstrated a redundancy system.

Result: Compliant

3.7.13 Contingency Plan - Transmittal of Required Data

Aim: To ensure that the PSP has a strategy to address failure in transmission of data.

Response: Yellow provided a written guide to contingency planning and demonstrated a redundancy system.

Result: Compliant

3.7.14 Monitoring of Data Input for Errors

Aim: To ensure that the PSP has a strategy to monitor for inconsistencies and errors within the collection of operational data

Response: Yellow demonstrated a written guide to contingency planning and demonstrated a redundancy system. The company also described its relationship with DDS in the recovery of data.

Result: Compliant

3.7.15 Statement of Integration - Third Party DDS

Aim: To ensure that the PSP provided a method of integration for DDS trips into their system or reporting. This to take the form of either demonstration of a DDS trip 'button' that can be pushed for DDS trips, and/or a clear Application Protocol Interface (API) between the DDS and the PSP systems.

Response: Yellow demonstrated its API integration with Curb

Result: Compliant

3.7.16 Physical Equipment Compliance

Aim: To ensure that the PSP conforms with requirements for in vehicle equipment, based on the technical specifications set out in Title 31.

Response: The PSP has a written exemption granted by the commission in respect of the physical dimensions of their PIM. All other aspects of the technical requirements are full met.

Result: Compliant, subject to exemption

3.7.17 Safety Features

Aim: To ensure that the PSP meet requirements for the provision of safety features and their minimum technical specifications set out in Title 31.

Response: The PSP does not currently provide a passenger side safety feature as required in Title 31.

Result: Not compliant

4.0 Initial Findings

In undertaking the audit, a number of common themes were observed across PSPs. These relate to:

- Inconsistencies in contract and frequency of payment
- Inconsistencies and non-compliance with recording of insurance
- Variance in fees
- Extent and nature of integration for DDS trips
- Safety Call buttons

4.1 Inconsistencies in Contract and frequency of payment

PSPs are required to process payments to operators within a 24-hour period of receipt of payment. This should, in theory, allow for daily payments from PSPs to operators. The majority of PSPs offered payment to operators on a weekly basis, which is not compliant with the current requirements of Title 31. 3 of the PSPs reported they were able to offer payment on a 24-hour basis, though all suggested weekly payment was preferred by operators and PSPs.

A number of PSPs presented the view that operators' preference for payment frequency was once per week rather than the mandated 24-hour period after reporting. This is clearly an option that the operators may choose to make voluntarily with the PSP and should not be discouraged. The current regulations require, however, that the payment be available more frequently should the operator so desire this, and this fact is not clear in a number of contracts.

The lack of reference to payments on a daily basis appears to be in conflict with the requirement to process payment within 24 hours.

It may be appropriate for the Commission to revisit this requirement to identify whether a weekly payment cycle may be permissible as a "normal" cycle, or whether the existing requirement should continue.

4.2 Operator Records

PSPs are required to make reasonable effort to ensure that the status of operators using their services is current and valid. This was interpreted to include reasonable efforts to demonstrate a operator held valid licenses and insurance.

All PSPs were able to demonstrate operator status, including valid licensing, with the exception of current insurance status.

In many instances, the PSP is also the insurance broker for its operators in and, in these cases, all PSPs were able to demonstrate operators had coverage. PSPs were not able to provide details of insurance status for operators insured through third party brokers. It is apparent that the current lack of information prevents some PSPs from fully complying with their requirements.

It may be appropriate that the Commission take action to ensure that the PSP may obtain this information from the insurance broker where this is a separate third party provider.

4.3 Variation in Fees

It is noted that the differing PSPs offer a number of competitive fee structures. This reflects a standard approach to a competitive market.

4.4 DDS Integration

Title 31 sets a requirement that PSPs provide a method of integration for DDS trips into their system or reporting. This can take the form of either a DDS trip “button” that can be pushed for DDS trips, and/or the development of an Application Protocol Interface (API) between the DDS and the PSP systems. Only one PSP (Yellow) demonstrated active integration though the same concept was highlighted as desirable by other PSPs. One PSP (VIP) uses a DDS Button to record DDS trips. Verifone also provided feedback that they were launching a DDS app in DC, but this is unlikely to satisfy the requirements for integration as currently stated in Title 31.

4.5 In Vehicle Information Module Technical Specifications

Title 31 defines a series of technical specifications in relation to in vehicle equipment, including minimum screen size requirements. These were included as additional audit questions, and are set out in the preceding sections by PSP.

The minimum specification for a passenger information module is a screen size no less than seven inches and no greater than 12 inches across. All PSPs, with the exception of Yellow cab, comply with this size requirement. Yellow cab has a written exemption to this requirement, issued under the Linton administration, and this exemption has no expiration. All other PSPs are in compliance with this requirement.

4.6 In Vehicle Safety Features

Title 31, § 603.8 (n) (3) sets out technical specifications and requirement for vehicles to their safety equipment for the use of passengers.

At the time of this writing, none of the PSPs were in compliance with the requirement to provide a passenger safety feature, though a number have provided feedback indicating that the

Commission has been in the process of developing a protocol for the operation of a safety feature beyond what is required Title 31. None of the PSP's are fully compliant.

4.7 PSP Audit Updates

In a number of cases, further actions have been requested of the PSPs, with a number of actions already completed and noted in this report.

It is recommended that the Commission review the status of any outstanding audit updates no later than three months from the date of the final version of this report and continue to do so on a three-month cycle until all outstanding issues are resolved.