

Carma Tolling App HOV Discount Violation and Account Suspension Policy

Version 1.2

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Summary

Carma is responsible for identifying potential High Occupancy Vehicle (HOV) violation candidates, communicating with them through a series of messages and deactivating persistent violators. This process is governed by the HOV Discount Violation Process Policy determined by NCTCOG and its partner agencies. Unlike real-time roadside HOV discount violation identification, Carma identifies potential candidates based on pattern analysis of usage against a set of HOV Discount Violation Trigger Scenarios. This improves the effectiveness of HOV discount violation identification and allows for a fairer engagement with users.

High Occupancy Vehicle (HOV) Violation Definition

Violation as used below is as defined in the applicable Carma Tolling App Terms of Service (TOS) and includes any activity engaged in by the account holder that results in that person obtaining an HOV discount in a manner that is not consistent with the TOS or Regional Transportation Council (RTC) TOLled Managed Lane Policy. Violations include, but are not limited to, intentionally or unintentionally obtaining the HOV discount through the use of an additional phone/device and/or occupant beacons. Violations at multiple gantries during one day is only considered one violation for the purposes of this policy. The HOV discount violation will be referred to as “violation” through the remainder of the document.

Violation Process Policy

- NCTCOG is responsible for determining the Violation Process Policy, i.e. rules and guidelines determining how violations should be handled.
- Carma is responsible for communicating with violation candidates. This will comprise the following communication channels:
 - call center
 - email
 - in-app messaging
- NCTCOG will not seek retrospective toll payment collection for confirmed violators.
- Violators will not be issued with any tickets / fines / legal proceedings.
- HOV account violations (a user creates a second account) will result in an instant and permanent account suspension.

Overview/Concept

Customer Education Period (0-90 days after account set up)

Any potential violations of the TOS of the Carma Tolling App will be treated as an opportunity to educate the customer on proper use of the app as well as vehicle and occupant beacons in order to qualify for the HOV discount. No account suspensions will occur during this period, absent clear, willful abuse and/or fraud.

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The 90-day clock will start with the application download.

- Violations detected will automatically receive a warning issued by Carma (email, in-app). This warning will include:
 - a reminder of general instructions
 - a warning that repeat violation may result in their account being suspended
 - instructions for how to contact Carma

Regular Account Usage Period (rolling 45-day periods)

Violations will be assessed during rolling 45-day periods after the Customer Education Period

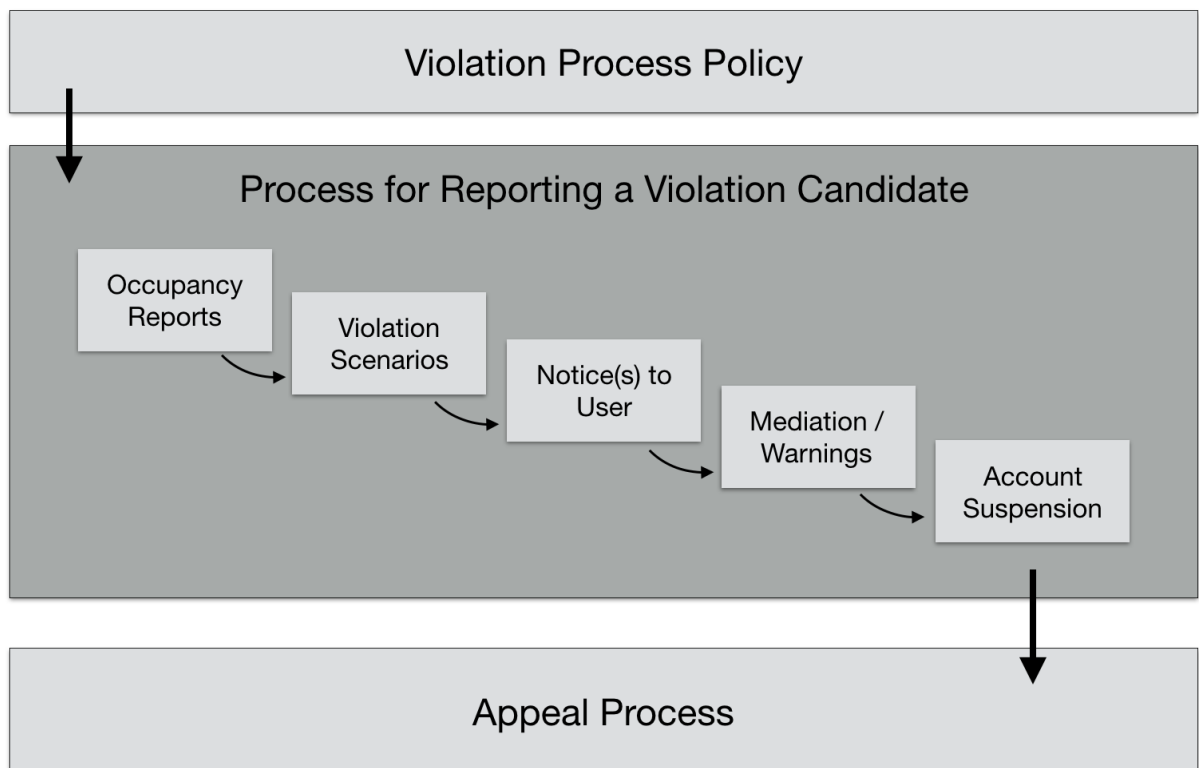
Increasing level of communication with each violation

- Violations that are repeated 5 times within 45 days will automatically trigger an account suspension of 45 days. This means:
 - The Carma user will not be eligible for HOV discounts
 - The Carma user vehicle account will be suspended and any Car Beacon registered to the Carma user will not be eligible for HOV discounts. The Carma user passenger account will not be suspended as a passenger or occupant.
 - The user will see a Notice of Account Suspension when they open the app
 - The user will receive a Notice of Account Suspension by emailAutomatically reinstated after 45 days
- Violations that are repeated 5 times during the 2nd 45-day rolling period will result in a 60-day account suspension.
 - Same suspension as above plus the following.
 - May be appealed to Carma
 - Define what the recourse is if they do not like response.
 - Automatically reinstated after 60 days
 - Warning that future account suspension will be considered for a one-year period
- Violations that are repeated 5 times during the 3rd 45-day rolling period will result in a one-year suspension.
 - May be appealed to NCTCOG
 - Can only be reinstated after one-year or approval by NCTCOG
- Violators (with confirmed suspensions) may appeal their account suspension
 - Each Notice of Account Suspension includes a link to an Appeal form, which collects:
 - the user's email address
 - the user's name
 - text description of why the user believes their account suspension is incorrect
 - On submission of the form
 - an email is sent to Carma

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- a confirmation email is issued to the user, explaining that they will receive a response within X days
- Carma will provide an evidence package to NCTCOG with
 - the user's email address
 - the user's toll tag details (if applicable)
 - the user's license plate details (if applicable)
 - list of violations (type, timestamp, evidence)
 - the user's appeal
- Carma will revoke an account suspension if requested by NCTCOG

Usage Violation Policy Overview:



Notifications to Users Prior to Suspensions

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For each rolling 45-day period during the Regular Account Usage Period, violations will be treated as follows:

1st Violation:

Customer service notification (friendly) through app (e.g., Oops, looks like you may left your occupant beacon in the car....).

Identify specific violation

Refer to specific FAQ tailored to violation

2nd Violation:

Notice of Violation of Terms of Service (It appears that you have violated TOS....)

Identify specific violation

Referral to "Customer Service" for questions on how to address

Warning that future violations may result in temporary account suspension

3rd Violation:

Notice of Violation of Terms of Service (You have violated TOS....)

Identify specific violation

Referral to "Account Suspension Department" to address

Warning that future violations may result in a temporary account suspension

4th Violation:

Notice of Violation of Terms of Service (You have violated TOS....)

Identify specific violation

Referral to "Account Suspension Department" to address

Warning that any future violations will result in a 45-day temporary account suspension.

5th Violation:

Notice of 30-Day Temporary Account Suspension

Referral to "Account Suspension Department"

Suspension Department can determine whether to uphold or reverse the suspension

Account is automatically reinstated after 45 days.

The above language should be adjusted for the 2nd and 3rd 45-day rolling periods as appropriate.

Carma Violation Trigger Scenarios

There are 2 types of Carma Violation Trigger Scenarios:

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1. Account Violation Trigger Scenarios
2. Usage Violation Trigger Scenarios

Account Violation Trigger Scenarios

Account violations occur when a user creates another Carma account. Account violations result in instant and permanent account suspensions.

The Carma violation identification engine will evolve over time, but the table below serves to outline sample known violation scenarios.

#	Title	Description
1	2nd Account	A user creates a second account using a different email address / phone number / name.

Usage Violation Trigger Scenarios

Usage violations occur when Carma detects violations based on usage / occupancy reports.

The Carma violation identification engine will evolve over time, but the table below serves to outline sample known violation scenarios.

#	Title	Description
2	2nd Smartphone Left in Car	A user leaves a 2nd smartphone in the car at all times to ensure HOV status is achieved even on SOV trips.
3	Occupant Beacon Left in Car	A user leaves an Occupant Beacon in the car at all times to ensure HOV2 status is achieved even on SOV trips
4	2nd Smartphone Carried	A user carries a second smartphone at all times to ensure HOV2 status is achieved even on SOV trips.
5	2nd Occupant Beacon Carried	A user carries an Occupant Beacon at all times, in addition to another occupant device, to ensure that HOV2 status is achieved even on SOV trips.
6	2 Cars Together	2 single occupancy cars are next to each other in traffic so that each car momentarily achieves a HOV 2 status.

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7	Duplicate Account	If a toll tag, license plates and/or email is used, then deleted, then a customer tries to use any of these items again. They are not eligible for the 90-day grace period.
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Account Suspension Rules:

A violation candidate will be issued with a *Notice of Account Suspension* based on the Violation Process Policy defined above.

Account Suspension will apply to a specific Carma user account. In the event where multiple Carma users are involved in the same repeat violations, each user account will receive a *Notice of Account Suspension*.

Account Suspension will result in the following being applied:

Title	Description
HOV Discount Suspension	The user's details will be excluded from the Carma User Tag Set, resulting in the user becoming ineligible to receive a HOV Toll Discount.

The period of account suspension will be determined by the Violation Process Policy, e.g. first account suspension will be for 45 days, second account suspension will be for 60 days, third (or greater) account suspension will be for 90 days. If account suspension occurs 5 times, the account suspension will be for 1-year.

As defined the Violation Process Policy, a user may appeal their account suspension.