

Fare Capping Policy Financial & Equity Assessment

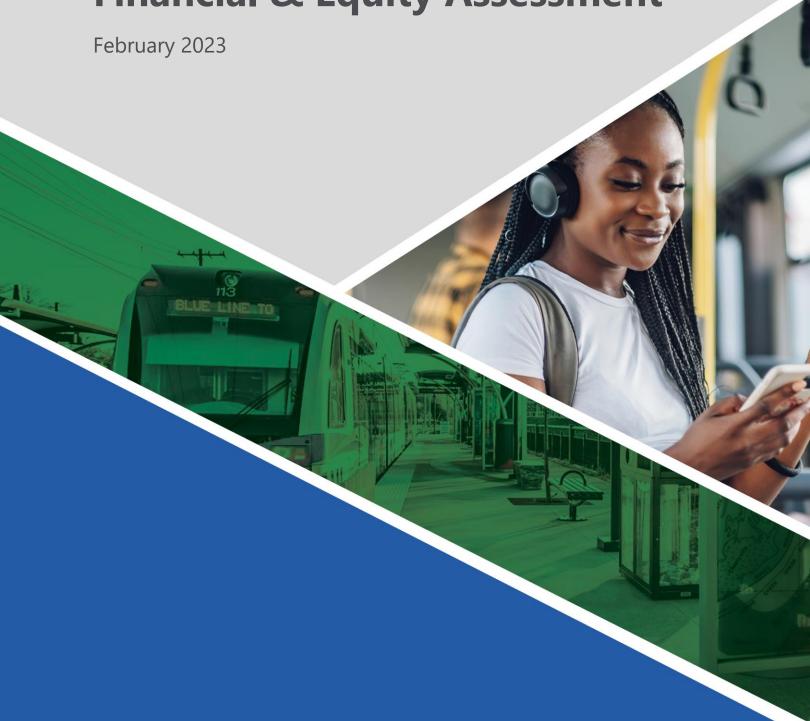




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INTRODUCTION

Charlotte Area Transit System (CATS) implemented a fare capping policy on September 21, 2022, to reward customers with a monthly pass once they have paid the equivalent value (\$88) in any combination of eligible fares through the CATS-Pass mobile app. When customers reach this threshold, a monthly pass is automatically added to their CATS-Pass wallet, enabling them to ride local bus and light rail for free for the remainder of that month. The goal of this policy is to both improve customer experience and ensure CATS services are affordable and accessible to all, especially for customers who ride frequently but cannot afford the upfront cost of a monthly pass.

The fare capping policy is currently implemented as a pilot to evaluate success over an approximate sixmonth period. During this time, a financial analysis was completed to estimate both the cost savings to CATS-Pass customers under the new policy. An assessment of the corresponding reduction in fare revenue collections resulting from customers being awarded a monthly pass, rather than paying fares for the remainder of the month, was also completed.

As a transit agency receiving federal funding through the Federal Transit Administration (FTA), CATS must conduct an equity assessment to evaluate the potential for impacts of any fare policy change on minority and low-income populations using guidance found in FTA Circular 4702.1B.

This report documents the results of the financial assessment and fare equity assessment for the CATS fare capping policy.





FARE CAPPING POLICY FINANCIAL ANALYSIS

2.1 Financial Analysis Assumptions

An analysis of fares purchased by customers through their CATS-Pass mobile app leading up to the implementation of the new fare capping policy was completed to estimate the customer benefits and corresponding monthly fare revenue reductions. The dataset included all CATS-Pass mobile fare purchases over the four-month period of April-July 2022. The parameters of this analysis include:

- The fare cap is based on the full fare monthly pass (\$88) for the Local Bus and LYNX service.
- Reduced fares for Local Bus and LYNX or other services, or fares for other services such as Express Bus, Express Bus Regional, etc., are not counted toward the fare cap.
- Only tickets/passes activated via a CATS-Pass account within a calendar month are eligible toward the fare cap. Tickets purchased are not counted toward the fare cap until activated within the CATS-Pass app.
- CATS-Pass accounts with multiple monthly passes activated within a calendar month were excluded from the analysis as the purchase of a secondary monthly pass would not apply toward the fare cap under the current policy. The analysis otherwise assumes that any combination of tickets/passes activated within a calendar month counts toward the fare cap as intended under the current policy.

2.2 Financial Analysis Results

This section presents the methodology used to review and calculate the potential financial impacts of the fare capping policy from both the customer and agency perspectives. Table 2-1 summarizes the dataset of activated fares by type during each month of the analysis period.

TABLE 2-1: SUMMARY OF TICKET COUNT BY ACTIVATION MONTH

Activation Period	Monthly Pass \$88.00	Weekly Pass \$30.80	Day Pass \$6.60	One-Way Ticket \$2.20	Total Activated Ticket Count
April 2022	97	126	1,166	16,181	17,570
May 2022	169	125	944	15,831	17,069
June 2022	225	124	954	14,861	16,164
July 2022	177	251	1,902	40,117	42,447
Total	668	626	4,966	86,990	93,250

Source: CATS Mobile Ticket Purchases (April-July 2022)

The 93,250 activated fares were each linked to a distinct CATS-Pass account and summarized based on the month activated (Table 2-2).





TABLE 2-2: # OF UNIQUE MOBILE ACCOUNTS & FARE COUNT BY ACTIVATION MONTH

Activation Period	Total Fare Count	# of Individual Mobile Accounts
April 2022	17,570	4,969
May 2022	17,069	5,069
June 2022	16,164	5,113
July 2022	42,447	8,368
Total	93,250	23,519

The fares activated under each CATS-Pass account were then analyzed to determine if the combined value exceeded the equivalent value of a monthly pass (\$88) for the month. As shown in Table 2-3, less than 1% of the CATS-Pass accounts activated eligible fares that exceeded the \$88 fare cap, equating to an average savings of approximately \$17 per customer each month. From the agency's perspective, this corresponds to an estimated fare revenue reduction of \$679 per month.

TABLE 2-3: # OF MOBILE ACCOUNTS WITH FARE CAP REACHED BY ACTIVATION MONTH

Activation Month	Total # of Mobile	Mobile Accounts Where Fare Cap Reached		Total Fare Value for	\$ / % of Total Fare Value Exceeding Monthly Fare Cap		
	Accounts	#	%	Month	(\$88)		
April 2022	4,969	23	0.5%	\$111,421	\$436	0.4%	
May 2022	5,069	26	0.5%	\$119,561	\$385	0.3%	
June 2022	5,113	29	0.6%	\$62,610	\$422	0.7%	
July 2022	8,368	78	0.9%	\$124,117	\$1,472	1.2%	
Total	23,519	156		\$417,710	\$2,715		
Monthly Average			0.6%	\$104,427	\$679	0.6%	

CATS 2022 Customer Survey; total and monthly percentages reflect weighted averages for the four month period.

Appendix A details the tickets/passes purchased under the 156 CATS-Pass accounts, along with the total fare value and estimated fare cap benefit (amount of the total fare value exceeding the \$88 monthly pass cost for each month).





3 FARE CAPPING POLICY EQUITY ASSESSMENT

In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, CATS conducts an equity assessment any time a change is proposed to its fare structure to ensure that changes do not unfairly impact persons of color or who are low-income. For proposed changes that will increase or decrease fares system-wide, on certain transit modes, or by fare payment type or fare media, CATS shall analyze available customer data to understand whether the change will result in a disparate impact (when minorities are disproportionately represented) or disproportionate burden (when the low-income community is disproportionately impacted). If disparate impacts or disproportionate burdens are identified, an analysis will be performed to determine the effect on the impacted population(s).

For purposes of this assessment and consistent with FTA Circular 4702.1B, the following definitions apply:

- Minority is defined as a person who identifies being part of one or more racial/ethnic groups besides White, non-Hispanic. Customer responses during survey questions regarding their race and Hispanic ethnicity were used to determine minority status.
- **Low-Income** is defined as a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. Customer responses during survey questions regarding their annual household income and number of people living in their household were used to determine low-income status.¹

3.1 Equity Assessment (Current Fare Capping Policy)

2022 Customer Survey Data

To conduct this equity assessment, weekday data collected during the most recent CATS customer survey (August—October 2022) were used to determine whether enacting the fare capping policy indicates a disparate impact or disproportionate burden.

The fare capping policy applies to a subset of customers who use the CATS-Pass mobile app to purchase any combination of eligible full fares, including one-way tickets, day passes, weekly passes, and monthly passes. Although the purchase of a monthly pass automatically equals the fare cap, there is nothing to preclude the purchase of individual tickets prior to the purchase of a monthly pass that would still provide the cost savings benefit of the fare cap. The type of fare a customer indicated for the surveyed trip was used to determine eligibility under the fare cap.

¹ The mid-point of the income range provided by the customer was used as the proxy for the customer's annual household income amount. This, along with the persons per household response, was used to determine whether the customer is low-income based on the 2022 HHS poverty guidelines.





Although customers were asked where they purchased the fare used, there was not a sufficient response rate to further separate customers who purchased fares eligible toward the fare cap through the CATS-Pass mobile app versus other venues. Therefore, for purposes of this analysis, eligible tickets/passes purchased by customers via CATS-Pass or other venues are considered equal.

CATS implemented the fare capping policy as a key strategy to improve rider experience and ensure its service is affordable and accessible to all, especially those who cannot afford the upfront cost of a monthly pass. The fare capping policy involves no change (increase or decrease) to the fare structure itself but may affect how much a customer pays for fares within a calendar month. For customers eligible for the fare cap there are no adverse impacts to the policy, only benefits in terms of cost savings once the fare cap is met in a calendar month.

For this proposed change, the analysis examined whether minority or low-income customers may experience a lesser share of the positive impacts due to the implementation of this policy.

Customer Demographic Profile

Table 3-1 compares the percentage of minority and low-income customers for all surveyed (systemwide) to the subset of customers using a fare eligible toward the fare cap policy. The percentage of minority customers using an eligible fare is 18% higher than the systemwide dataset, while the percentages of low-income customers are similar across both datasets. This indicates that minority customers are more likely to purchase a fare type eligible toward the fare cap policy compared to all available fare types.

TABLE 3-1: DISTRIBUTION OF WEEKDAY MINORITY & LOW-INCOME CUSTOMERS

CATS Customers (weekday)	Minority Customers	Low-Income Customers		
Systemwide	62.6%	21.8%		
Fare Type Eligible for Fare Cap ¹	74.1%	22.4%		

Source: CATS 2022 Customer Survey

For reference, Table 3-2 provides the percentage of minority and low-income populations for CATS' overall service area, as documented in the agency's 2020 Title VI Program.

TABLE 3-2: DISTRIBUTION OF WEEKDAY MINORITY & LOW-INCOME CUSTOMERS

Service Area	Minority Population	Low-Income Population
CATS Service Area Population	49.0%	15.9%

Source: CATS 2020 Title VI Program—Table 13 (minority) and Table 14 (low-income); data in the source document from the U.S. Census Bureau, 2011-2015 American Community Survey.



¹Includes full fare one-way ticket, day pass, weekly pass, or monthly pass.



Equity Assessment

The customer survey data were filtered based on fare types eligible toward the fare cap, then analyzed to understand the correlation between usage and fare price by demographic group.

As shown in Table 3-3, the data indicate that minority customers are more likely to purchase lower-cost one-way tickets and less likely to purchase higher-cost multi-trip passes. This suggests that a higher proportion of minority customers could benefit from the fare capping policy by eliminating the up-front cost of purchasing a calendar month pass and enabling customers to purchase a monthly pass in smaller increments.

TABLE 3-3: DISTRIBUTION OF TICKET PURCHASES BY TICKET TYPE - MINORITY COSTUMERS

Fare Type	Amount	All Customers		Minority Customers		Non-Minority Customers	
One-Way	\$2.20	2,173	63%	1,668	65%	505	56%
Day Pass	\$6.60	211	6%	150	6%	61	7%
Weekly Pass	\$30.80	451	13%	287	11%	164	18%
Monthly Pass	\$88.00	626	18%	459	18%	167	19%
Total		3,461		2,564		897	

Source: CATS 2022 Customer Survey

A similar assessment for low-income customers was undertaken. As shown in Table 3-4, low-income customers are more likely to purchase higher-cost multi-trip passes. However, it is important to note that, of the fare types listed in the table, a higher proportion of low-income customers purchase discounted tickets/pass options (23%) compared to higher-income customers (12%). Further, there is a higher percentage of low-income customers that ride CATS frequently (86%), defined as riding three to seven days per week on average, compared to higher-income customers (82%).

TABLE 3-4: DISTRIBUTION OF TICKET PURCHASES BY TICKET TYPE - LOW-INCOME COSTUMERS

Fare Type	Amount	All Customers		Low-Income Customers		Higher Income Customers	
One-Way	\$2.20	2,173	63%	435	58%	1,738	64%
Day Pass	\$6.60	211	6%	35	5%	176	7%
Weekly Pass	\$30.80	451	13%	144	19%	307	11%
Monthly Pass	\$88.00	626	18%	142	19%	484	18%
Total		3,461		756		2,705	

Source: CATS 2022 Customer Survey

Summary

The proposed fare policy changes required a fare equity assessment to identify any potential disparate impact on minority riders and/or disproportionate burden on low-income riders. The technical analysis using survey data found:

- No potential disparate impact/disproportionate representation on minority riders associated with the introduction of a fare capping policy.
- No potential disproportionate burden on low-income riders associated with the introduction of the fare capping policy.





 The result of this equity assessment concludes that minority and low-income riders will not be limited or denied the benefits of the proposed fare changes. The data indicate a higher proportional benefit to minority customers because of the new policy.

3.2 Other Considerations

The findings of this analysis do not prompt CATS to consider possible measures to avoid, minimize, and/or mitigate adverse impacts on minority or low-income riders within the parameters of the current fare capping policy. Albeit, there were no adverse impacts presented, as customers who reach the cap will benefit from this policy by paying less for fares over the course of a calendar month compared to if the policy were not in place. Other considerations related to fare capping and CATS' specific policy are discussed below.

Barriers to Fare Capping Benefits

Although the intention of fare capping is to provide equity in fare cost versus trips taken among transit customers, there are potential barriers to accessing the benefits of fare capping, particularly for vulnerable users. These barriers primarily include the need for both a smartphone (mobile device with internet) and credit/debit card to pay for fares via the mobile account.

An analysis of smartphone and credit access was undertaken for those customers surveyed and using a fare type eligible towards the cap. As shown in Table 3-5, a higher percentage of minority customers (13%) do not have access to a smartphone and a credit card compared to non-minority customers (7%).

TABLE 3-5: DISTRIBUTION OF CUSTOMER SMARTPHONE & CREDIT CARD ACCESS (MINORITY STATUS)

Access to Both	Fare Cap Eligible Ticket Purchases by:						
Access to Both Smartphone & Card	Systemwide Customers		Minority Customers		Non-Minority Customers		
No	386	11%	327	13%	59	7%	
Yes	3,075	89%	2,237	87%	838	93%	
Total	3,461		2,564		897		

Source: CATS 2022 Customer Survey

Similarly, a higher percentage of low-income customers (14%) do not have access to a smartphone and a credit card compared to higher-income customers (10%), as shown in Table 3-6.

TABLE 3-6: DISTRIBUTION OF CUSTOMER SMARTPHONE & CREDIT CARD ACCESS (INCOME STATUS)

Access to Both	Fare Cap Eligible Ticket Purchases by:						
Smartphone & Card	Systemwide Customers		Low-Income Customers		Higher-Income Customers		
No	386	11%	104	14%	282	10%	
Yes	3,075	89%	652	86%	2,423	90%	
Total	3,461		756		2,705		

Source: CATS 2022 Customer Survey





To help improve access to mobile fares, CATS advertises the Federal Communications Commission's income-based Affordable Connectivity Program (ACP) through which qualifying households can receive one free smartphone and free monthly service.

Discounted Fare Cap Policy Consideration

CATS' current fare capping policy applies only to full fare options as there is not currently a way to verify customer eligibility for discounted fares through purchases in the CATS-Pass app. Should this verification mechanism be added, CATS could then explore implementing a discounted fare cap policy.

Under a proportional fare cap approach, customers eligible for discounted fares would reach a monthly cap based on the cost of the discounted monthly fare (\$44). This would provide a proportional benefit after the same number of trips as a regular-fare rider, and both regular-fare riders and discounted-fare riders would experience similar percentage discounts for any number of trips. As noted previously, a higher proportion of CATS' low-income customers use discounted tickets/pass options, but do not benefit from a fare cap on the discounted monthly pass value and must, therefore, purchase twice the equivalent fare value to gain benefit of the fare cap.

An analysis of the customer mobile ticket purchases for the April-July dataset used in the financial analysis was undertaken to understand the extent of customers who purchase discounted fares and may benefit from a proportional discounted fare capping policy (Table 3-7). Using the \$44 discounted monthly pass as the cap, a significantly higher percentage of customer mobile accounts that purchase discounted tickets would likely benefit from the discounted fare cap – 4.8% on average compared to 0.6% of mobile accounts purchasing full fare tickets (from Table 2-3).

TABLE 3-7: # OF REDUCED TICKET MOBILE ACCOUNTS WITH FARE CAP REACHED BY ACTIVATION MONTH

Activation Month	Total # of Mobile	Discounte	Mobile Accounts Where Discounted Fare Cap Reached*		\$ / % of Total Fare Value Exceeding Monthly Fare Cap		
	Accounts*	#	%		(\$44)*		
April 2022	709	34	4.7%	\$9,304	\$916	9.8%	
May 2022	660	21	3.2%	\$8,538	\$586	6.9%	
June 2022	712	24	3.3%	\$8,720	\$736	8.4%	
July 2022	1,254	81	6.4%	\$19,937	\$2,270	11.4%	
Total	3,336	159		\$46,499	\$4,509		
Monthly Average		4.8%		\$11,625	\$1,127	9.7%	

CATS 2022 Customer Survey; total and monthly percentages reflect weighted averages for the four month period. *Includes CATS-Pass accounts with only discounted eligible tickets. Customers that purchased both full fare and discounted fare ticket options within a month are not included in this analysis.





Appendix A: Financial Analysis Detail

TABLE A-1: ANALYSIS OF MOBILE ACCOUNTS WITH FARE CAP REACHED — APRIL 2022

Mobile Account Sequence*		Fare Type	& Amount				
	Monthly Pass \$88.00	Weekly Pass \$30.80	Day Pass \$6.60	One-Way Ticket \$2.20	Total Ticket Count	Total Fare Value	Estimated Fare Cap Benefit
1	\$88.00 1	\$30.80	\$6.60	\$2.20 1	2	\$90.20	\$2.20
2	1			_	2		
	_			1	2	\$90.20	\$2.20
3	1			1		\$90.20	\$2.20
4	1			1	2	\$90.20	\$2.20
5	1			1	2	\$90.20	\$2.20
6			13	3	16	\$92.40	\$4.40
7		3			3	\$92.40	\$4.40
8		3			3	\$92.40	\$4.40
9	1		1		2	\$94.60	\$6.60
10		3		1	4	\$94.60	\$6.60
11				43	43	\$94.60	\$6.60
12			6	26	32	\$96.80	\$8.80
13		3	1		4	\$99.00	\$11.00
14		3	1		4	\$99.00	\$11.00
15				49	49	\$107.80	\$19.80
16				50	50	\$110.00	\$22.00
17		4			4	\$123.20	\$35.20
18		4			4	\$123.20	\$35.20
19		4			4	\$123.20	\$35.20
20		4			4	\$123.20	\$35.20
21		4			4	\$123.20	\$35.20
22		5			5	\$154.00	\$66.00
23				75	75	\$165.00	\$77.00
Total	6	40	22	252	320	\$2,459.60	\$435.60



^{*}For privacy purposes, individual mobile account #s not shown.



TABLE A-2: ANALYSIS OF MOBILE ACCOUNTS WITH FARE CAP REACHED — MAY 2022

Mobile Account Sequence*		Fare Type	& Amount			Estimated.	
	Monthly Pass \$88.00	Weekly Pass \$30.80	Day Pass \$6.60	One-Way Ticket \$2.20	Total Ticket Count	Total Fare Value	Estimated Fare Cap Benefit
1	1			1	2	\$90.20	\$2.20
2				41	41	\$90.20	\$2.20
3	1			1	2	\$90.20	\$2.20
4	1			1	2	\$90.20	\$2.20
5	1			1	2	\$90.20	\$2.20
6	1			1	2	\$90.20	\$2.20
7	1			1	2	\$90.20	\$2.20
8		3			3	\$92.40	\$4.40
9		3			3	\$92.40	\$4.40
10	1			2	3	\$92.40	\$4.40
11	1			2	3	\$92.40	\$4.40
12	1			2	3	\$92.40	\$4.40
13	1			2	3	\$92.40	\$4.40
14		3			3	\$92.40	\$4.40
15		3			3	\$92.40	\$4.40
16	1		1		2	\$94.60	\$6.60
17	1		1		2	\$94.60	\$6.60
18				43	43	\$94.60	\$6.60
19		3	2		5	\$105.60	\$17.60
20		3	3		6	\$112.20	\$24.20
21		3		11	14	\$116.60	\$28.60
22		4			4	\$123.20	\$35.20
23		4			4	\$123.20	\$35.20
24		4			4	\$123.20	\$35.20
25		5			5	\$154.00	\$66.00
26				73	73	\$160.60	\$72.60
Total	12	38	7	182	239	\$2,673.00	\$385.00



^{*}For privacy purposes, individual mobile account #s not shown.



TABLE A-3: ANALYSIS OF MOBILE ACCOUNTS WITH FARE CAP REACHED – JUNE 2022

		Fare Type	& Amount			Father at a d	
Mobile Account Sequence*	Monthly Pass	Weekly Pass	Day Pass	One-Way Ticket	Total Ticket Count	Total Fare Value	Estimated Fare Cap Benefit
1	\$88.00 1	\$30.80	\$6.60	\$2.20	2	¢00.20	¢2.20
2	1			1	2	\$90.20 \$90.20	\$2.20 \$2.20
3	1			1	2	\$90.20	\$2.20
4	1				2		
5				1	2	\$90.20	\$2.20
	1					\$90.20	\$2.20
6	1			1	2	\$90.20	\$2.20
7	1			2	2	\$90.20	\$2.20
8	1	2		2	3	\$92.40	\$4.40
9		3			3	\$92.40	\$4.40
10	_	3			3	\$92.40	\$4.40
11	1			2	3	\$92.40	\$4.40
12	1			2	3	\$92.40	\$4.40
13	1			2	3	\$92.40	\$4.40
14	1			2	3	\$92.40	\$4.40
15		3			3	\$92.40	\$4.40
16		3			3	\$92.40	\$4.40
17		3		1	4	\$94.60	\$6.60
18		3		1	4	\$94.60	\$6.60
19	1			4	5	\$96.80	\$8.80
20			14	4	18	\$101.20	\$13.20
21	1		2		3	\$101.20	\$13.20
22		3		6	9	\$105.60	\$17.60
23		3	2	2	7	\$110.00	\$22.00
24		2	9		11	\$121.00	\$33.00
25		4			4	\$123.20	\$35.20
26		4			4	\$123.20	\$35.20
27		4			4	\$123.20	\$35.20
28		5			5	\$154.00	\$66.00
29				74	74	\$162.80	\$74.80
Total	14	43	27	109	193	\$2,974.40	\$422.40



^{*}For privacy purposes, individual mobile account #s not shown.



TABLE A-4: ANALYSIS OF MOBILE ACCOUNTS WITH FARE CAP REACHED — JULY 2022

Mobile		Fare Type	& Amount	Total	Total	Ectimated	
Account Sequence*	Monthly Pass \$88.00	Weekly Pass \$30.80	Day Pass \$6.60	One-Way Ticket \$2.20	Total Ticket Count	Total Fare Value	Estimated Fare Cap Benefit
1	1			1	2	\$90.20	\$2.20
2	1			1	2	\$90.20	\$2.20
3	1			1	2	\$90.20	\$2.20
4	1			1	2	\$90.20	\$2.20
5	1			1	2	\$90.20	\$2.20
6	1			1	2	\$90.20	\$2.20
7	1			1	2	\$90.20	\$2.20
8	1			1	2	\$90.20	\$2.20
9	1			1	2	\$90.20	\$2.20
10			14		14	\$92.40	\$4.40
11		3			3	\$92.40	\$4.40
12		3			3	\$92.40	\$4.40
13		3			3	\$92.40	\$4.40
14				42	42	\$92.40	\$4.40
15	1			2	3	\$92.40	\$4.40
16				42	42	\$92.40	\$4.40
17	1			2	3	\$92.40	\$4.40
18				42	42	\$92.40	\$4.40
19	1			2	3	\$92.40	\$4.40
20		3			3	\$92.40	\$4.40
21	1			2	3	\$92.40	\$4.40
22	1		1		2	\$94.60	\$6.60
23				43	43	\$94.60	\$6.60
24		3		1	4	\$94.60	\$6.60
25			1	41	42	\$96.80	\$8.80
26	1			4	5	\$96.80	\$8.80
27	1		1	1	3	\$96.80	\$8.80
28				44	44	\$96.80	\$8.80
29			2	38	40	\$96.80	\$8.80
30			14	3	17	\$99.00	\$11.00
31		3		3	6	\$99.00	\$11.00
32		3	1		4	\$99.00	\$11.00
33				45	45	\$99.00	\$11.00
34		3	1	1	5	\$101.20	\$13.20
35		1	11		12	\$103.40	\$15.40
36		3		5	8	\$103.40	\$15.40
37		3		5	8	\$103.40	\$15.40
38		3		5	8	\$103.40	\$15.40
39			3	38	41	\$103.40	\$15.40
40			16		16	\$105.60	\$17.60
41			1	45	46	\$105.60	\$17.60
42		3	2		5	\$105.60	\$17.60





		Fare Type	& Amount			- · · · ·	
Mobile Account	Monthly	Weekly	Day Pass	One-Way	Total Ticket	Total Fare	Estimated Fare Cap
Sequence*	Pass	Pass		Ticket	Count	Value	Benefit
Sequence	\$88.00	\$30.80	\$6.60	\$2.20	Count	Value	Delicit
43		3	2		5	\$105.60	\$17.60
44		1		34	35	\$105.60	\$17.60
45		1	5	20	26	\$107.80	\$19.80
46		2	7		9	\$107.80	\$19.80
47	1		3		4	\$107.80	\$19.80
48		3		7	10	\$107.80	\$19.80
49				49	49	\$107.80	\$19.80
50				49	49	\$107.80	\$19.80
51		3		7	10	\$107.80	\$19.80
52		3	2	1	6	\$107.80	\$19.80
53		3	2	1	6	\$107.80	\$19.80
54		1	11	3	15	\$110.00	\$22.00
55				51	51	\$112.20	\$24.20
56			5	38	43	\$116.60	\$28.60
57			18		18	\$118.80	\$30.80
58		4			4	\$123.20	\$35.20
59		4			4	\$123.20	\$35.20
60		4			4	\$123.20	\$35.20
61		4			4	\$123.20	\$35.20
62		4			4	\$123.20	\$35.20
63		4			4	\$123.20	\$35.20
64		4			4	\$123.20	\$35.20
65		4			4	\$123.20	\$35.20
66		4			4	\$123.20	\$35.20
67	1			16	17	\$123.20	\$35.20
68		4			4	\$123.20	\$35.20
69		4			4	\$123.20	\$35.20
70			17	6	23	\$125.40	\$37.40
71		4		1	5	\$125.40	\$37.40
72	1	1		5	7	\$129.80	\$41.80
73				59	59	\$129.80	\$41.80
74		4		4	8	\$132.00	\$44.00
75				60	60	\$132.00	\$44.00
76			21		21	\$138.60	\$50.60
77		2		37	39	\$143.00	\$55.00
78				65	65	\$143.00	\$55.00
Total	19	112	161	978	1270	\$8,335.80	\$1,471.80



^{*}For privacy purposes, individual mobile account #s not shown.