

**Compliance Filing of Side.cr LLC
Plan on Avoiding Divide Between Able and Disabled Communities
December 23, 2013**

Side.cr LLC (“Sidecar”) hereby submits this compliance filing to the requirement of the California Public Utilities Commission for an accessibility plan from Transportation Network Companies (“TNCs”) operating under agreements with the Commission prior to the due dates of the new rules and regulations for new TNC’s pursuant to Decision No. (D.) 13-09-045 (Sept. 19, 2013).

Sidecar, which has been operating for a little over a year, is a “ridematch” information service that enables members to exchange information via the Sidecar smartphone mobile application (“app”) with other members who carpool or wish to find a ridematch. Sidecar developed the software and manages an interactive computer system that facilitates communication, via a mobile app, between ridematch members who are authorized to either drive or ride (or both) under Sidecar’s terms of service. Sidecar designed its platform from the beginning to facilitate a voluntary rideshare community that allows both drivers and riders complete choice in connecting with one another.

Sidecar requires that passengers include their destination when they make a request, so that drivers can make an informed decision about whether picking them up makes sense for them or not depending on the driver’s destination. Drivers are not Sidecar employees. At present, Sidecar does not dispatch drivers, put them on “shifts”, or compensate them with wages or other consulting fees. Rather, a third party payment service processes all payments made by the passenger to the driver. The driver can access those payments through the driver app.

Sidecar has cultivated a strong sense of community among our app users, both drivers and users who utilize Sidecar’s mobile application to match rides to common destinations. Sidecar’s dedication and commitment to fostering this community has encouraged the development of several initiatives to educate and expand our service to disabled communities in all our operational cities, including our current locations throughout California. Sidecar currently provides service in San Francisco, Oakland, San Jose, Los Angeles, San Diego and Long Beach.

Sidecar submits this plan on avoiding divide between able and disabled communities on the specific topic of service to persons with disabilities in California. We welcome any further suggestions or comments on these initiatives, and expect that this plan will continue to evolve in the coming months as we partner with community groups and gain more experience.

RIDESHARING'S HISTORY AND GOALS

The goals of ridesharing have remained consistent since the United States federal government encouraged carpooling and promoted it as a patriotic duty during World War II. The goals of carpooling were to conserve energy to strengthen national security, reduce waste and environmental impacts, and defray the high cost of automobile ownership.¹ These goals are even more relevant today as the Golden State works to reduce green house gases, including automobile emissions. According to a recent study by the American Lung Association, eight of the top ten cities most polluted by long-term particle pollution are in California.²

The physical and electronic mechanisms enabling carpool and rideshare matching have evolved from bulletin boards, cork ride-boards, and telephone services to electronic message boards, social networks, and smartphone mobile app technologies, but the environmental and other benefits remain. Only the efficiencies and manner of matching drivers to riders have evolved to take advantage of advanced information technology on smart phones that fits in our pockets.

Ridesharing's potential to provide widespread benefits has been researched and documented by numerous government, non-profit and academic sources and reflect decades of government pilot studies, reports and academic reviews.³

Broad adoption of ridesharing requires a threshold and concentration of drivers and passengers. In addition, sufficient incentives need to be provided to drivers to encourage them to offer a ride to others sharing a destination. The many potential benefits of "shared transportation" will only be realized if it is able to grow out of niche commuter and casual carpooling, community bulletin boards and *ad hoc* carpooling arrangements to become a mainstream solution that is self-sustaining without government funding and subsidization.

Dynamic ridesharing platforms, like Sidecar's service, allow passengers to see in real-time that drivers are available and choose to take a ride with them. An additional benefit is the ability of riders and drivers to see community reviews of each other on the Sidecar app to add more information about the person with whom

¹ Since the introduction of carpooling by the federal Government in World War II, federal, state and local governments throughout the U.S. as well as thousands of non-profits and companies have sponsored, funded, and managed carpooling and ridesharing programs. The purpose and rationale for such programs has varied from promoting important national security, economic and environmental interests to reducing traffic and parking congestion, and helping workers reduce the costs of commuting.

² American Lung Association 2013 State of the Air Study: <http://www.stateoftheair.org/2013/city-rankings/most-polluted-cities.html>. The California cities are Bakersfield-Delano, Merced, Fresno-Madera, Hanford-Corcoran, Los Angeles-Long Beach-Riverside, Modesto, and Merced.

³ See, e.g., Nelson D. Chan & Susan A. Shaheen (2012): Ridesharing in North America: Past, Present, and Future, *Transport Reviews*, 32:1, 93-112; U.S. Department of Transportation, Ridesharing Options Analysis and Practitioners' Toolkit, December 2010.

they will share a ride. Community riders are coming to Sidecar, because our service provides them a safe, convenient and economical transportation option where they donate what they want in exchange for a ride. Community drivers are incentivized to participate in rideshare, because it helps them offset the costs associated with owning and operating a car – the second biggest household expense and most underutilized household asset.

SIDECAR IS COMMITTED TO SERVE COMMUNITIES OF PERSONS WITH DISABILITIES

Sidecar is committed to serve communities of persons with disabilities, in addition to other communities that are underserved by traditional services such as the taxi and limousine industries. Sidecar has found that encouraging ridesharing in traditionally underserved communities requires the same, if not more attention, to overcoming critical mass issues and providing driver incentives to encourage participation in and service to those communities.

Sidecar proposes to achieve adoption of its service in the disability community by actively reaching out to partner with local advocacy groups such as Disability Rights California; ADAPT, Northern California and ADAPT, Southern California; California Foundation for Independent Living Centers (CFILC), and World Institute on Disability (WID) in order to: (1) educate and train potential passengers about Sidecar and ridesharing as a transportation alternative; and to (2) discuss appropriate driver incentives to serve these communities, including those drivers who own wheelchair accessible vehicles who might wish to become Sidecar drivers. We started our community outreach this quarter and plan to have a more detailed plan by March 2014 that will include partnerships with disability groups, and potential additional incentives for drivers of wheelchair accessible vehicles.

Mobile App and Website Accessibility Standards

We commend the Commission on ensuring that TNC mobile apps and websites are accessible by people with disabilities. Visually impaired users and accessibility groups, such as the National Federation of the Blind, have indicated to Sidecar that the use of technological resources to provide better forms of transportation were necessary due to high levels of frustrations for this group when using public transportation and traditional taxi and limousine services.

As a result, Sidecar already has devoted significant resources to ensure that its app and mobile website are accessible to blind users. Sidecar is currently redesigning its website for reasons unrelated to accessibility, and the redesign will be compliant with WCAG 2.0 AA and is expected to be complete by December 31, 2013.

Although there are not consistent guidelines or rules regarding custom designed mobile applications, Sidecar has redesigned its iOS mobile application to be compatible with Apple VoiceOver, an accessibility feature on iPhones that reads text

to blind or low vision users to guide them while using their iPhone. Further, Sidecar tested new versions of the app before launch with several blind users and the National Federation of the Blind to ensure the app design was compatible with their use. Sidecar is currently in the process of redesigning the Android application for vision-impaired users although it is our understanding that most visually impaired persons use the iOS version. Sidecar expects that Android redesign to be complete on or about January 31, 2014. Blind users and the National Federation of the Blind will also be testing future app releases to ensure ease of use for blind or low vision users.

Finally, Sidecar is currently in process of performing community outreach efforts to blind and low vision groups, including those that promote independence, to help educate this group about the availability of Sidecar in California communities and how this may benefit their lives. For instance, we will be conducting a Reddit “ask me anything” with one of our accessibility engineers so that other mobile engineers can learn from our experience making the mobile application accessible. Sidecar is also sponsoring “hotspots” for national blind groups annual meetings in order to get the word out about the services that Sidecar can uniquely offer blind or low vision users.

Service Pets and Accessible Vehicles

Sidecar is currently in the process of developing pilot programs to provide service to persons with disabilities or limited mobility. Currently, most Sidecar drivers accept service pets, and Sidecar has some wheelchair accessible vehicles in the Los Angeles market. We ask our passengers to email or call the Sidecar driver before the driver arrives to confirm whether the driver will accommodate service pets. We have had no instances of a driver declining a ride due to a service pet (or any pet for that matter). In fact, we have heard from users that the drivers have provided a valuable service to them and their service pets. Where many taxi or livery vehicles would drive away, leaving a passenger with a service pet stranded, Sidecar passengers with service pets, report that Sidecar drivers are gladly accept the ride and go the extra mile to help the passenger.

Sidecar will modify our mobile app to allow a Sidecar passenger to indicate that he or she needs an accessible vehicle rather than having to call the driver. Sidecar expects to implement this feature in the next six to nine months.

As a side note, Sidecar cautions the CPUC against dictating mobile app design features such as “a drop-down menu with room for comments or through a field requesting information”, when the goal is to provide a functionality, regardless of design, to allow passengers to clearly indicate their particular needs in app. Sidecar suggests that indicating the functionality desired as the goal, and then allowing the TNCs to implement it in the best way possible given each company’s innovative mobile app design is a “best practice” for providers of mobile app software.

While Sidecar is committed to providing accessible service, providing this service to individuals who require wheelchair access is currently one of our biggest challenges. In our service model as described above, Sidecar does not own or lease the vehicles used by community drivers and is prevented from doing so by the CPUC's D. 13-09-045 Finding of Fact 25: a "TNC is not permitted to itself own vehicles used in its operation". Moreover, unlike other services, Sidecar does not dispatch or direct any driver to provide a particular ride to a user. Because Sidecar is only the technology platform that allows passengers and drivers to match themselves on a shared ride, Sidecar cannot provide wheelchair-accessible vehicles in the same way that taxis and sedan services can.

Rather, Sidecar's goal is to work to grow the wheelchair-accessible driver community in the same way that it grows the larger driver community – through appropriate driver incentives. Sidecar is holding roundtables with existing wheelchair-accessible community drivers to learn how to effectively grow this community. Sidecar is also reaching out to independent living groups and accessibility advocates, such as the Center for Accessible Technology, to identify strategies to provide sufficient incentives to increase the number of wheelchair-accessible community drivers. Sidecar is also exploring partnerships with various communities to allow them to leverage the Sidecar platform to connect wheelchair accessible vehicles (potentially owned by a city or volunteer organization) to those that need them.

Sidecar is confident that, given time, it can grow this driver base. Owners of wheelchair-accessible vehicles are passionate about the need for these types of vehicles. Further, participating in Sidecar as a community driver can help owners of such vehicles offset the high costs of these vehicles. Sidecar is also currently exploring the feasibility of a pilot program that would have wheelchair accessible vehicle drivers operate on a "volunteer fire-fighter" model and be on shift for rides requiring such vehicles. Sidecar expects to have more details about the initial success of these plans in the next nine months.

CONCLUSION

Community driven principles of inclusion and trust ensure that Sidecar will remain a ridesharing platform that serves all aspects of the disabled community. Sidecar has seen great success with our initiatives to improve accessibility for blind and low vision users and for those with service animals. Sidecar's biggest challenge in servicing wheelchair bound persons is not the attitude of its driver community towards the disabled, but the need to encourage drivers of wheelchair-accessible vehicles to participate on the Sidecar platform. Sidecar is committed to initiatives to encourage this participation and remains confident that abled and disabled Sidecar passengers will experience no material difference using the Sidecar platform in due course.