BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on Regulations Relating to Passenger Carriers, Ridesharing, and New Online-Enabled Transportation Services	R. 12-12-011 (Filed December 20, 2012)

ACCESSIBILITY PLAN OF INSTANTCAB

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Submitted by:

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This document summarizes InstantCab's timeline and plans with respect to making its app more accessible to persons with disabilities.

I. INSTANTCAB'S ACCESSIBILITY GOALS

InstantCab is a company based in San Francisco that provides a mobile platform to connect people seeking a ride with drivers willing to provide a ride. InstantCab works with both taxi drivers driving a taxi and community drivers driving their personal vehicles. InstantCab believes transportation apps like the InstantCab app enhance people's mobility and transportation options and wants everyone to be able to use them.

InstantCab intends to increase access in five ways: (1) allow people with disabilities to indicate access needs within the app; (2) move towards meeting accepted accessibility standards; (3) add more vehicles in the InstantCab system that can accommodate persons with disabilities; (4) better accommodate service animals; and (5) prevent discrimination by in-app rating mechanisms. These goals have varying methods and timelines of implementation.

II. TIMELINE FOR ALLOWING PERSONS WITH DISABILITIES TO INDICATE ACCESS NEEDS

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InstantCab understands the importance of opening transportation apps to all communities, including the disabled community. To that end, InstantCab will work on allowing riders to indicate access needs within the app in both its Android and iPhone rider apps.

We have design plans that will allow riders to specify if they need a wheelchair-accessible vehicle from within the app. This will use an in-app functionality similar to a drop-down menu or a free form text field that will also allow riders to indicate more specific or detailed access needs, beyond just wheelchair access. Since these changes in the application will have to be supported via changes in operations, a campaign to inform riders and drivers about the changes, as well as non-trivial engineering and design resources, the timeline for building these features into the app is approximately 6 months for both the iPhone app and the Android app.

III.TIMELINE FOR MEETING WCAG ACCESSIBILITY STANDARDS

InstantCab will also move towards meeting the accessibility guidelines set out in Web Content Accessibility Guidelines 2.0A ("WCAG") by the World Wide Web Consortium. We will take steps to make both our Android and iPhone rider apps accessible under the WCAG guidelines.

The four primary WCAG accessibility standards are (1) perceptibility; (2) operability; (3) understandability; and (4) robustness. To make the apps more perceptible to people with disabilities, we will provide text alternatives in the app. An important step in this direction is to make the apps compatible with text-to-speech tools that are already available for iPhones and Android phones. Given that

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we are a small company with limited engineering resources, the timeline on modifying our app to make it work with existing text-to-speech tools is approximately 6 months for both the iPhone rider app and the Android rider app.

In addition, our website (http://instantcab.com/) already supports built-in web browser tools that zoom in on the page so that the text appears larger. We plan to add more video and audio files to the website so that people with visual impairments can learn about how to use our app even if they cannot read the text on the website. The timeline on adding more video and audio content to the website is approximately 3 months.

The second and third WCAG accessibility principles, operability and understandability, state that content should be easy to find, navigate, and read. The different pages on our website are titled at the top so they are easy to navigate. The website lists, among other things, FAQs, our office contact information, and links to download the iPhone and Android rider apps.

To aid understandability and operability, the InstantCab app has an interactive rider demo when a user first installs the app that walks them through how the app works and the functionalities of different buttons. The demo is sensitive to the time that different users may need to understand the content. The user must click or tap a specific place on the screen to move forward to the next step of the demo. In addition to walking the user through how to make an InstantCab request, the demo also points out the menu button where the user can make changes to their account or call support for additional help.

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Making an InstantCab request is also sensitive to different users' needs. Once the rider enters in his or her pick-up location, the request is sent to drivers only when the rider clicks "Summon an InstantCab." Once the rider is matched to a driver, the app displays the amount of time it will take for the driver to arrive at the pick-up location. A record of all trips is saved in the rider's personal InstantCab trips page. At any time, the rider can log onto this page (from the app or on the web) to see their trip history, the cost of previous trips, the driver for previous trips, and the rating they gave the driver for previous trips. Therefore, InstantCab has already taken steps toward ensuring that the app is operable and understandable by a diverse set of users.

The final WCAG principle is robustness of the technology. InstantCab has a professional in-house testing team to avoid the introduction of bugs into web features and the app. In addition, InstantCab uses beta testing to discover and address bugs and get feedback from end users of the app. When InstantCab prepares for a release of a new version of the app, we ask a core set of frequent drivers and riders to beta test the new version for a few days and notify the engineering team of any technical issues or bugs they experience. These in-house testing procedures will result in a robust website and app.

IV. PLAN FOR ADDING MORE ACCESSIBLE VEHICLES

InstantCab will recruit more drivers who can fulfill requests for accessible vehicles. InstantCab plans to incentivize community driver applicants who have accessible vehicles in multiple ways. InstantCab already mentions the need for and importance of accessible vehicles during driver recruitment, both in online

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platforms where it advertises as well as in in-person driver recruitment. InstantCab will motivate more drivers to make their vehicles accessible by letting them know that this can result in more rides and more money for them.

Another thing that InstantCab plans to do in the future is create a monetary incentive for drivers with accessible vehicles to join InstantCab. For example, we may offer a higher share or one-time bonus to drivers who have accessible vehicles because we recognize their importance within the InstantCab system. We may also offer to reimburse drivers for all or a portion of the cost of making their vehicles accessible to persons with disabilities.

V. TIMELINE FOR ACCOMMODATING SERVICE ANIMALS

Service animals enhance the daily independence of persons with disabilities, so it is important that InstantCab can accommodate service animals.

InstantCab has already posted its service animal policy on its FAQ webpage (http://instantcab.com/faq/) telling riders that service animals are allowed in vehicles within the InstantCab system. Barring a medical condition of the driver or some other emergency, drivers must allow service animals in their vehicles to remain active within the InstantCab system.

InstantCab plans to allow riders, when making a request, to indicate within the app if they need a vehicle that can accommodate a service animal. In addition, InstantCab eventually hopes to have an automated way to dispatch only those drivers who can accept service animals to such requests. In other words, drivers who cannot accept service animals would not see those ride requests where the passenger indicates they have a service animal. This reduces the problem of a driver

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having to decline the ride *after* accepting the request due to allergies or other medical reasons. Due to the design and engineering resources required for these changes, these features will take 12 months to develop for both the iPhone rider app and the Android rider app.

VI. PLAN FOR PREVENTING DISCRIMINATION BY IN-APP REVIEWS

One positive feature in TNC apps like InstantCab is that drivers and riders can rate each other and create a community that values excellent customer service. However, it is equally important that rating mechanisms are not used as a tool to unlawfully discriminate against users of the service. This applies to both riders rating drivers and to drivers rating riders.

InstantCab operates a rating system for drivers that spans from 5 (excellent driving and excellent customer service) to 1 (poor driving and poor customer service). When a rider rates a driver less than a 4, the InstantCab customer support team reaches out to the rider and asks them to share feedback about their experience. If the rider makes discriminatory remarks in the feedback, the support staff would take measures to block that rider from using the service again.

Whenever a driver has a rider-related concern, they can report it by calling or emailing support. If a driver rates a rider with a low rating, we plan to require an explanation of the low rating to avoid discrimination. Our support staff will investigate the matter by calling or emailing the rider and getting the rider's side of the story. Decisions to block a rider are based on more than just one bad rating. Moreover, we primarily block riders from using InstantCab only if they pose a safety threat or have engaged in credit card fraud. Our support team plans to audit driver

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ratings for riders on a periodic basis and contact riders to ensure that discrimination does not occur.

VII. CONCLUSION

Based on the foregoing plans and timeline, InstantCab will become more accessible to persons with disabilities in the near future. InstantCab hopes to make the app interface more accessible to persons with disabilities, take steps toward meeting accessibility standards, add more vehicles to the InstantCab system that can accommodate persons with disabilities, better accommodate service animals, and prevent discrimination by in-app rating mechanisms.

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Respectfully Submitted,

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