



**San Francisco  
County Transportation  
Authority**

# Implementing SB 1376

## TNC Access for All - Track 4 Issues

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# TNC OFFSET REQUIREMENTS

- The Commission Should Adopt San Francisco's Adjusted Interim WAV Response Time Metric To Account For Trip Completion Issues

|   |              |
|---|--------------|
| Offset Request (approved)                     | \$709,265.07 |
| Unique WAV Trip Requests                      | 3,510        |
| # Cancelled by Customer                       | 1,099        |
| # Completed                                   | 1,393        |
| % Completed (excluding cancelled by customer) | 58%          |

|                | Standard | Response Time | Adj Response Time |
|----------------|----------|---------------|-------------------|
| Level 1        | 25       | <b>27.47</b>  | <b>47.54</b>      |
| Level 2        | 50       | <b>41.52*</b> | <b>71.86</b>      |
| Meet Standard? |          | <b>Yes</b>    | <b>No</b>         |

\*This represents the 80th percentile as template does not include reporting on the 75<sup>th</sup> percentile

# TNC OFFSET REQUIREMENTS

- The Commission should **only use the Level 1 (50<sup>th</sup> percentile) benchmark**
  - Level 2 is so high that it is easily met, as demonstrated in the Commission's Response Time Report
  - "Either/Or" Level 1 or Level 2 means standard is easily met
  - Response times are biased because they don't reflect the fact that many trips go unfulfilled, leaving WAV users without transportation

| County        | Level 2 Benchmark | Avg Level 2 Response Time |
|---------------|-------------------|---------------------------|
| San Francisco | 30                | 22.5                      |
| Alameda       | 50                | 21.3                      |
| Contra Costa  | 50                | 23.1                      |
| Los Angeles   | 50                | 23.9                      |
| Orange        | 50                | 15.5                      |
| Sacramento    | 50                | 33.6                      |
| San Diego     | 50                | 13.3                      |
| San Joaquin   | 50                | 17.2                      |
| San Mateo     | 50                | 22.1                      |
| Santa Clara   | 50                | 22.3                      |
| Ventura       | 50                | 14.9                      |
| Marin         | 60                | 22.0                      |
| Riverside     | 60                | 11.6                      |

Source: TNC ACCESS FOR ALL PROGRAM Response Time Report

# TNC OFFSET REQUIREMENTS

- The Commission should establish permanent metrics and **benchmarks that incentivize achieving service levels equivalent to non-WAV service**
- Current Trip Completion Standard
  - **Inconsistent with the Statute** (ie. “shall include...percentage of trips fulfilled vs trips requested”)
  - **Does not require meaningful improvement** (e.g. serving one single trip more from one quarter to the next would meet the standard)
  - Should **incentivize achieving service levels equivalent to non-WAV service**
- Additional Metrics Are Not Necessary At This Time
- Amend Appendix A to require TNCs to identify fare revenues, or any other revenues, associated with the service giving rise to an offset request

# ACCESS FUND DISBURSEMENTS

Access provider eligibility **unfairly precludes qualified access providers** already serving WAV riders, such as taxis in San Francisco.

- Utilize Commission staff analysis and **adopt required standards for Access Fund Administrators**
- Meanwhile, while the Commission resolves its concerns, **allow potential access providers to provide non-Commission certifications** if they are regulated by other entities



# ACCESS FUND DISBURSEMENTS

- The Commission **should not consider exceptions for "smaller TNCs"** until the issue is clearly defined and relevant to improving access to riders with disabilities.
- The Commission should **rescind eligibility for TNCs to apply as Access Providers in counties they do not provide WAV services.**

# ADDITIONAL ACCESSIBILITY ISSUES

The CPUC should **establish an ADA Coordination Office** to focus on accessible transportation issues

- It is the Commission's obligation to ensure access under the Americans with Disabilities Act (ADA)
- ADA Coordination Office should oversee transportation issues, including but not limited to Charter Party Carriers, Passenger Stage Corporation Carriers, Vessel Common Carriers, TNCs, and Autonomous Vehicles
- This rulemaking should identify essential duties as they pertain to implementing TNC Access for All Act

# Contact Information

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