

CALIFORNIA PUBLIC UTILITIES COMMISSION
Consumer Protection and Enforcement Division
Advice Letter Summary Form

TNC & AL FILER INFORMATION

Date of Submission:	Date of Service:
TNC Name:	PSG #:
DBA Name:	
Address:	
City:	State: ZIP Code:
Filer's Name:	
Filer's Email:	Filer's Phone:

AL INFORMATION

Advice Letter #:	AL Type: Offset Retroactive Exemption
Geographic Area(s):	
Offset/Retroactive Amount:	Quarter: Year:
Documents Included: <input type="checkbox"/> Cover letter <input type="checkbox"/> Service List <input type="checkbox"/> Training Declaration <input type="checkbox"/> Marketing Materials <input type="checkbox"/> Signed Accounting of Funds <input type="checkbox"/> Inspection Declaration <input type="checkbox"/> Data Reports (Excel)	
Reason (if not all document boxes above are marked):	

SUBMISSION INFORMATION

Combine (in this order) AL summary form, cover letter, service list, Marketing Materials, TNC WAV training declaration, TNC vehicle inspection declaration, Signed Accounting of Funds Expended, and Signed Claim form (if necessary) into a single PDF file. The completed data reports must be in a single Excel file. A complete advice letter submission will consist of only two attachments: the PDF and Excel packets. Submit via email the advice letter with two attachments to TNCAccess@cpuc.ca.gov and to the [R.19-02-012 service list](#).

The cut off time to be considered filed the same day as submitted is 5:00 PM (Pacific Standard Time). Files submitted after 5:00 PM or on a non-business day will be considered filed on the following business day.

FOR CPUC USE ONLY

Analyst:	30-Day Due Date:
Completion Date:	Disposition:
Approved Offset/Retroactive Amount:	AL Effective Date:
Supervisor:	Supervisor Review Date:



Uber Technologies, Inc.
 1515 3rd Street
 San Francisco, CA 94158
 uber.com

October 17, 2022
Uber Technologies, Inc.
PSG0038150
Advice Letter No. 15

California Public Utilities Commission
 Consumer Protection and Enforcement Division
 Transportation Licensing and Analysis Branch
 505 Van Ness Avenue
 San Francisco, CA 94102

Re: Uber Technologies, Inc. - Advice Letter No. 15 (Q3 2022)

I. Offset Request

Pursuant to Decision (D.) 20-03-007, D.21-03-005, and D.21-11-004, Uber Technologies, Inc. (“Uber”) submits this Advice Letter No. 15 to request to offset Quarter 3 of 2022 TNC Access For All Fund¹ fee payments by the amounts Uber spent to improve wheelchair accessible vehicle (“WAV”) service in Quarter 3 of 2022. The requested effective date of this advice letter is November 16, 2022 (30 days from date of filing).^{2 3}

The offset amounts requested by county are as follows:

County	Offset Requested⁴ (\$)
ALAMEDA	\$ -
ALPINE	\$ -

County	Offset Requested (\$)
ORANGE	\$ -
PLACER	\$ -

¹ S.B. 1376, Cal. Legis. Serv. Ch. 701 (2018); *see also* Pub. Util. Code § 5440.5(a)(1)(B)(ii).

² Pursuant to Rule 1.15 (Computation of Time) of the Commission Rules and Procedures (California Code of Regulations Title 20, Division 1, Chapter 1), Uber submits this advice letter on the first day when Commission offices are open after 15 days from the end of Quarter 3 of 2022.

³ As a good faith participant in the TNC Access for All program, Uber submits this advice letter without any request for confidential treatment. While Uber maintains that certain information contained herein is commercially sensitive and constitutes protectable trade secrets, Uber submits this information unredacted in an effort to advance the goals of this program. Uber reserves its right to seek confidential treatment of this type of information in the future.

⁴ The expenditures included here are not exhaustive and inclusive of all amounts spent by Uber to enable, expand, and improve WAV service on the Uber platform.

AMADOR	\$ -
BUTTE	\$ -
CALAVERAS	\$ -
COLUSA	\$ -
CONTRA COSTA	\$ -
DEL NORTE	\$ -
EL DORADO	\$ -
FRESNO	\$ -
GLENN	\$ -
HUMBOLDT	\$ -
IMPERIAL	\$ -
INYO	\$ -
KERN	\$ -
KINGS	\$ -
LAKE	\$ -
LASSEN	\$ -
LOS ANGELES	\$ -
MADERA	\$ -
MARIN	\$ -
MARIPOSA	\$ -
MENDOCINO	\$ -

PLUMAS	\$ -
RIVERSIDE	\$ -
SACRAMENTO	\$ -
SAN BENITO	\$ -
SAN BERNARDINO	\$ -
SAN DIEGO	\$ -
SAN FRANCISCO	\$ 437,690.33
SAN JOAQUIN	\$ -
SAN LUIS OBISPO	\$ -
SAN MATEO	\$ -
SANTA BARBARA	\$ -
SANTA CLARA	\$ -
SANTA CRUZ	\$ -
SHASTA	\$ -
SIERRA	\$ -
SISKIYOU	\$ -
SOLANO	\$ -
SONOMA	\$ -
STANISLAUS	\$ -
SUTTER	\$ -
TEHAMA	\$ -

MERCED	\$ -
MODOC	\$ -
MONO	\$ -
MONTEREY	\$ -
NAPA	\$ -
NEVADA	\$ -

TRINITY	\$ -
TULARE	\$ -
TUOLUMNE	\$ -
VENTURA	\$ -
YOLO	\$ -
YUBA	\$ -

Subtotal \$ 0

Subtotal \$ 437,690.33

Total Offset Request **\$ 437,690.33**

Per D.20-03-007, D.21-03-005, and D.21-11-004, Uber provides the following documents in support of its request as indicated in the summary table below (including all counties for which the TNC seeks offsets):

Criteria	Must Demonstrate	Documentation Included (Y/N)
1. Presence and availability of WAVs ⁵	(a) the number of WAVs in operation - by quarter and aggregated by hour of the day and day of the week; and (b) the number and percentage of WAV trips completed, not accepted, cancelled by passenger, cancelled due to passenger no-show, and cancelled by driver – by quarter and aggregated by hour of the day and day of the week; and (c) operating hours for each geographic area	Y

⁵ D.20-03-007 Ordering Paragraph 1.

<p>2. Improved level of service⁶</p>	<p>(a) Offset Time Standard & WAV Response Times⁷: Meet or exceed both the relevant Level 1 and Level 2 Response Time Benchmarks for a given quarter in a given geographic area within the Offset Response Time Benchmarks (ORTB). The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request in that quarter (see Table A)</p> <p>(b.1) Trip Completion Standard⁸: Meet or exceed the applicable minimum percentage of trip requests completed (see Table B), and</p> <p>(b.2) Either (i) a greater number of completed trips than in the immediately prior quarter, or (ii) a greater number of completed trips than in the immediately prior year’s same quarter, if sufficient data is available. A TNC may elect to be compared to this prior quarter or prior year’s same quarter, if applicable (see Table C). The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request.</p>	<p>Y</p>
<p>3. Efforts to publicize and promote available WAV services⁹</p>	<p>Evidence of outreach efforts such as a list of partners from disability communities, how the partnership promoted WAV services, and marketing or promotional materials of those activities</p>	<p>Y</p>

⁶ D.21-11-004 Ordering Paragraph 1-3, 6, and 7.

⁷ D.21-11-004 Ordering Paragraph 1, 2, and 3.

⁸ D.21-11-004 Ordering Paragraph 6 and 7.

⁹ D.20-03-007 Ordering Paragraph 9.

<p>4. Full accounting of funds expended¹⁰</p>	<p>Qualifying offset expenses are: (a) reasonable, legitimate costs that improve a TNC’s WAV service, and (b) incurred in the quarter for which a TNC requests an offset, and (c) on the list of eligible expenses attached as Appendix A, and (d) net of fare revenues collected from WAV service delivery in the quarter for which a TNC requests an offset¹¹</p>	<p>Y</p>
<p>5. Training and inspections¹²</p>	<p>(a) certification of WAV driver training completion within the past 3 years, and (b) WAV driver training programs used per geographic area, and the number of WAV drivers that completed WAV training in that quarter, and (c) Certification of WAV inspection and approval</p>	<p>Y</p>
<p>6. Reporting complaints¹³</p>	<p>Number of complaints related to WAV drivers or services – by quarter and geographic area, and broken out by category: Securement Issues; Driver Training; Vehicle Safety and Comfort; Service Animal; and Other issues.</p>	<p>Y</p>

¹⁰ D.20-03-007 Ordering Paragraph 10.

¹¹ D.20-03-007 Ordering Paragraph 9.

¹² D.20-03-007 Ordering Paragraph 13 and 15(f), 15(g), and 15(h).

¹³ D.20-03-007 Ordering Paragraph 14.

Table A: Level 1 and Level 2 Offset Time Standards (percent) and ORTB (minutes) by County

County	Q3 2022					TNC claims the data demonstrates meeting or exceeding % of completed trips and within ORTB for Level 1 and 2?
	# Quarter Submission (1st, 2nd, 3rd, ...8th)	Level 1 (%)	Level 1 (mins)	Level 2 (%)	Level 2 (mins)	
SAN FRANCISCO	1st ¹⁴	53.56%	14.33	97.24%	19.70	Yes (Both)

Table B: Trip Completion Standard (part b.1)

County	# Quarter Submission (1 st , 2 nd , 3 rd , ...8 th)	County Group A, Group B, or Group C?	Trip Completion Rate (%)	TNC claims the data demonstrates meeting the minimum % of trip requests completed?
SAN FRANCISCO	1st	A	66.51%	Yes

Table C: Trip Completion Standard (part b.2)

County	Option 1 or 2 ¹⁵	(1) # of completed trips previous quarter	(2) # of completed trips in the immediately prior year's same quarter	(1) # of completed trips this quarter	(2) # of completed trip this quarter
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¹⁴ This is the first quarterly submission for San Francisco county under the requirements set forth within D.21-11-004.

¹⁵ See D.21-11-004 Ordering Paragraph 6.

SAN FRANCISCO	2	1572	1042	1559	1559
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WAV Operating Hours

Any prospective passenger can request a WAV ride through Uber’s app 24 hours a day, 7 days a week in all counties (each geographic area) throughout California.

II. Background

In 2018, Senate Bill 1376, the “TNC Access for All Act,” was enacted by the California Legislature.¹⁶ Public Utilities (“Pub. Util.”) Code § 5440.5 establishes a framework whereby Transportation Network Companies (“TNCs”) are permitted to offset against quarterly Access Fund fee payments for amounts spent by the TNC during the quarter to improve WAV service.¹⁷

Uber recognizes its unique position as a TNC to enable increased access to third-party WAVs¹⁸ available for request via its online-enabled application, and appreciates the opportunity to submit this offset request advice letter.

III. Accessibility at Uber

As the first TNC in California to address WAV challenges on a widespread basis, Uber understands the hurdles associated with enabling increased access to WAVs on its platform. Uber’s technology is helping to increase mobility and independence for riders with disabilities, with features and capabilities like:

Cashless payments: Uber’s cashless payment option simplifies the payment process, reducing the need for riders to worry about counting out cash or exchanging bills with a driver.

On-demand transportation: The Uber app makes it easier for riders with disabilities to get from A to B at the touch of a button. They no longer have to arrange rides through a dispatcher or resort to other, less convenient, means of finding a ride.

Agreements and policies: Driver agreements, Uber’s Community Guidelines, Uber’s Service Animal Policy, and Uber’s Non-Discrimination Policy confirm that drivers must

¹⁶ S.B. 1376; *see also* Pub. Util. Code § 5440.5.

¹⁷ Pub. Util. Code § 5440.5(a)(1)(B)(ii).

¹⁸ Pub. Util. Code § 5431.5(b) (“‘Wheelchair accessible vehicle’ or ‘WAV’ means a vehicle equipped with a ramp or lift capable of transporting non-folding motorized wheelchairs, mobility scooters, or other mobility devices.”).

comply with all applicable laws, including, for example, those relating to their transportation of riders' service animals.

Riders who are blind or low-vision: With iOS VoiceOver, Android TalkBack, and wireless Braille display compatibility, the Uber app makes it easier for riders who are blind or low-vision to get where they need to go.

Riders who are deaf or hard of hearing: Audio is not needed for full functionality of the Uber app. Assistive technology such as visible and vibrating alerts can help riders who are deaf or hard of hearing use the Uber app easily, and in-app features, such as the ability to enter a destination, can facilitate non-verbal communication between the rider and driver.

Share your ETA and location: Riders can easily share their ride details, including the specific route and estimated time of arrival, with loved ones for extra peace of mind. Friends or family members will receive a link where they can see the driver's name, photo, and vehicle information, and track where the rider is on the map in real time until they arrive at their destination—all without downloading the Uber app.

When evaluating a TNC's efforts to increase access to third-party WAVs, Uber requests that the following be taken into consideration: compared to standard vehicles, WAVs have higher purchase prices; higher operating and maintenance costs; higher fuel costs; and higher insurance costs. Additionally, demand for WAV trips is extremely low, representing a very small fraction (less than 1%) of overall TNC demand.

Historically, Uber relied on drivers using their own WAVs to provide WAV services on the Uber platform. However, after observing the trends with individual-WAV ownership, Uber determined there were not enough individual WAV owners willing to make their WAVs available via the Uber app to service the public's demand, especially when geographic and temporal factors were taken into account.

Uber has invested significant capital to increase access to WAV service by partnering with third-party WAV providers. For example, in Quarter 3 of 2022, Uber spent nearly \$2.2 million on payments to third-party partners with WAVs.

In Quarter 3 of 2022, UberWAV service levels continued to ramp up in the Los Angeles service area due to Uber's expanded partnership with Tower WAV LLC (launched in Los Angeles in Quarter 1 of 2022). Uber expects this partnership to further support program growth and reliability across the San Francisco Bay Area counties and Los Angeles county.

More broadly, Uber remains invested in building an ecosystem that includes multiple WAV partners throughout its active markets to minimize the possibility of future service disruptions.

Uber also continues to explore other ways to enable increased access for persons with disabilities, and is committed to working with the Commission and interested stakeholders on this important issue.

Uber’s ability to continue to invest heavily to expand WAV service is dependent on the expectation that it will recoup some of its costs through the Access for All program, especially upon a showing of very high reliability and performance. If the Access for All program's offset rules preclude Uber from qualifying for fee offsets, Uber will not be able to invest at the same levels.

IV. Uber’s Offset Request Advice Letter

In accordance with D.20-03-007, D.21-03-005, and the templates provided by the Commission, Uber provides the following supporting information: this Advice Letter “38150 Uber Technologies, Inc. AL 15 Forms,” including Attachment A (Training and Inspections Declarations) and Attachment B (Outreach Narrative and Materials); and the .csv files referenced below.

1. WAVs in Operation

Data for the WAVs in operation in Quarter 3 of 2022 is provided in the report “UBER_2022Q3_WAVS_In_Operation_1.” Per the template provided by the Commission, the data is aggregated by hour of the day and day of the week for each county.

2. WAV Trips

Data detailing WAV trips in Quarter 3 of 2022 is provided in the report “UBER_2022Q3_WAV_Trips_2.” This report includes data on the percentage and number of WAV trips completed, not accepted, canceled-no show,¹⁹ canceled by passenger, canceled by

¹⁹ Uber cannot provide information regarding the number of WAV trips canceled due to passenger “no-shows” because there is insufficient reliable data to report. Attempting to collect data reflecting whether or not the reason for a cancellation is tied to a passenger not showing up would be susceptible to bias and other design issues, which would result in incomplete and inaccurate data collection. For those same reasons, a portion of driver cancellations may be due to rider “no-shows,” yet Uber cannot reasonably ascertain which portion of driver initiated cancellations this would account for. While Uber does not have reliable data to report for this category, for ease of the Commission’s analysis of Uber’s data files, Uber has entered “0” for this data rather than indicating “N/A.”

driver, and cancellations within completed trips, cancellations within not completed trips, and unique trips, aggregated by the hour of the day and day of the week.²⁰

When analyzing trip data, it is critical to acknowledge that riders often submit multiple trip requests prior to taking a WAV trip. This may occur because an initial trip request is not matched with a driver, the rider cancels or modifies an initial trip request, or the rider requests multiple times, hoping to find a closer vehicle. A subsequent completed non-WAV trip might also indicate that the prior WAV request was possibly made in error.

3. Response Times and the Offset Time Standard (OTS)

Data for response times for completed WAV Trips by Decile, including Periods A and B, is provided in the report “UBER_2022Q3_Response_Times_3.” Data demonstrating that Uber has fulfilled the relevant Offset Time Standard percentages for Level 1 and Level 2 is provided in the report “UBER_2022Q3_OTS_4.”

Uber urges the Commission to take into consideration numerous factors when evaluating response times. First, coverage can vary across counties and providers, making comparisons difficult, if not impossible. For example, some providers may only offer service during certain time windows or in certain areas. These providers cannot be compared to a provider that offers service across an entire county 24 hours a day, 7 days a week. Second, the fact that WAVs are servicing trips in a reasonable time compared to alternative accessible options should weigh considerably in the evaluation. Third, response times can be highly variable due to external factors such as seasonality, local or widespread emergencies (e.g., the COVID-19 pandemic), overall traffic patterns (e.g., rush hour), and business events such as onboarding of new third-party WAV service providers and implementation of any new outreach and service efforts resulting in increased demand for WAV trips.

In accordance with Pub. Util. Code § 5440.5, offset requests should be evaluated in light of “reasonable response times.” When analyzing the information presented for a certain county, the data should be considered holistically, as each piece of data is part of an overall picture of the county and California-wide service.

²⁰ Per CPUC’s instructions received via email on September 25th, 2020 in the file attachment labeled “Data Template Changes 092520.pdf”, Uber has calculated “Cancellations - Completed” and “Cancellations - Not Completed” as the total number of times that a trip request was accepted and canceled by a driver and redispached among trip requests that were ultimately completed and not completed, respectively. *E.g.*, per CPUC’s example, if trip request A was accepted, canceled and redispached a total of 5 times before being completed, then Uber would add 5 to the total count reported in the “Cancellations_Completed_Trips” row of the data file. Similar to previous instructions regarding counting trips, Uber has reported cancelations for the day and hour of the ultimate trip event.

4. Trip Completion Standard (TCS)

Data demonstrating that Uber has fulfilled the Trip Completion Standard is provided in the report “UBER_2022Q3_TCS_5.”

Similar to response times, because coverage can vary across counties and providers, comparisons for metrics such as trip completion rate can be difficult, if not impossible. For example, some providers may only offer service during certain time windows or in certain areas. These providers cannot be compared to a provider that offers service across an entire county 24 hours a day, 7 days a week. Further, completion rates can be highly variable due to the same external factors which can impact response times.

5. Outreach

Between July and September 2022 (Quarter 3 of 2022), Uber continued outreach to enhance understanding of the UberWAV program, solicit feedback for improving UberWAV as well as the broader accessibility of the Uber app, field questions from stakeholders, and strengthen ties for further partnerships to promote UberWAV post-pandemic. This quarter’s efforts included outreach, education, consultation, and follow-ups with community groups across Southern California and the San Francisco Bay Area. Core outreach activities in Q3 of 2022 included:

- **Email and newsletter updates, phone calls, and Q&A with stakeholder organizations**, including veteran disability groups, independent living organizations, community service providers, and community-based organizations.
- **Research and create a new outreach list of veteran disability groups** to raise awareness about UberWAV with a more diverse pool of accessibility stakeholders.
- **Offer presentations** with accessibility groups, independent living organizations, to raise awareness about UberWAV and help community members better utilize the service.

Additional narrative regarding Uber’s outreach efforts and related substantive materials are attached to this Advice Letter filing as Attachment B.

More data about Uber’s specific outreach efforts is provided in the report “UBER_2022Q3_Outreach_7.” In this report, there may be date ranges in the columns labeled “Date” that are associated with email and phone outreach. These ranges reflect the range of start dates of outreach for specific partners in that county for email and phone outreach.

6. WAV Training and Inspections

Information regarding WAV Driver Training is provided in the report “UBER_2022Q3_Training_and_Inspections_8” and required certifications are provided within Attachment A. The number of WAV drivers that have completed training is assigned according to the physical location of the fleet partner’s office, as that is where the training takes place.

7. Complaints

Information regarding complaints related to WAV services for each geographic area is provided in the report “UBER_2022Q3_Complaints_9.” In an effort to be comprehensive, some complaint information included may represent a situation unrelated to the actual quality of WAV service provided, such as inquiries regarding lost items and account or payment questions.

8. Accounting of Funds Expended

An accounting of certain funds expended in Quarter 3 of 2022 is included in the report “UBER_2022Q3_Funds_Expended_10.”

As indicated in the supporting documentation provided, Uber is investing a significant amount of money to enable increased access to WAVs. It is more expensive to maintain and incentivize WAV trips over UberX trips, yet Uber keeps WAV trips priced the same as a similar UberX trip. In order to do that, Uber must offer substantial incentives to our partners to make it financially viable for them to operate their WAVs on the Uber platform, given the substantially higher acquisition, operating, and maintenance costs incurred. Further, the amounts included herein are not exhaustive and represent only a subset of the capital expended to enable the WAV program. Simply put, the millions of dollars Uber has demonstrated it invests is intended to achieve an end goal of enabling access to accessible, on-demand transportation to the general population at a price, service level, and scale that simply is not commercially available anywhere else in the market today.

9. Contract Information

Information regarding contracts with service providers is included in the report “UBER_20223_Contract_Information_11.” The “Duration of Contract” column identifies the total length of the contract that was in effect during the reporting quarter. The entry “All CA Counties” under the column “County” indicates that the provider associated with that entry is eligible to provide trips starting in all California counties.

* * * * *

In compliance with General Order 96-B, we served a copy of this advice letter via email upon the parties identified on the attached R.19-02-012 service list on October 17, 2022. If there are any questions regarding this advice letter, please contact Adam Bierman at westregs@uber.com.

Any Party can protest or respond to this advice letter by sending a written protest or response via email to CPED at TNCAccess@cpuc.ca.gov. If submitting a protest, the protest must set forth the specific grounds on which it is based, including supporting information or legal arguments. A protest or response to the advice letter must be submitted to CPED within twenty (20) days of the date the advice letter was filed and must be served on the TNC on the same day.

Email a copy of the protest or response to this advice letter to Adam Bierman at westregs@uber.com.

To obtain information about the CPUC's procedures for advice letters and protests, visit CPUC's website at www.cpuc.ca.gov and look for links to General Order 96-B.

I HEREBY CERTIFY UNDER THE PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOLLOWING ATTACHMENTS HAVE BEEN EXAMINED BY ME AND ARE TRUE, CORRECT AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Respectfully submitted,

/s/ Adam Bierman

Adam Bierman
Senior Counsel, Regulatory
Uber Technologies, Inc.

Attachments

1. Attachment A - Signed Training & Inspection Declarations (PDF)
2. Attachment B - Outreach Narrative and Marketing Materials (PDF)
3. Data Attachments in CSV format (WAVs in Operation; WAV Trips; Response times; OTS; TCS; Outreach; Training and Inspections; Complaints; Funds Expended; and Contract Information)



California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: R1902012 - CPUC - OIR TO IMPLEM
FILER: CALIFORNIA PUBLIC UTILITIES COMMISSION
LIST NAME: LIST
LAST CHANGED: OCTOBER 10, 2022

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ATTACHMENT A

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
TNC ACCESS FOR ALL
WHEELCHAIR ACCESSIBLE VEHICLE INSPECTION DECLARATION FORM**

Carrier Name: Tower WAV LLC

PSG#: 39427-A

Pursuant to Decision 20-03-007 Ordering Paragraphs 14(c) and 15(h), all Wheelchair Accessible Vehicles (WAVs) operating on a TNC's platform shall be inspected and approved to conform with the Americans with Disabilities Act Accessibility Specifications for Transportation Vehicles within the past year.

TNCs shall be responsible for ensuring that each of their WAVs complies with this requirement and shall maintain records of such compliance for the duration of the program which is scheduled to sunset on January 1, 2026.

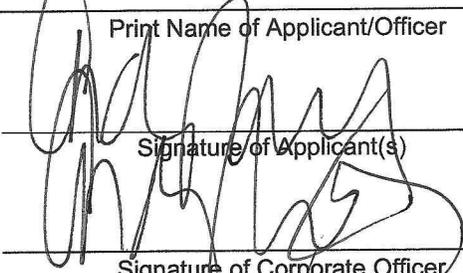
CERTIFICATION

I (we) certify (or declare), under penalty of perjury, that I (we) have read and understand the above requirements that all WAVs operating on the TNC platform be inspected and approved to conform with the Americans with Disabilities Act (ADA) Accessibility Specifications for Transportation Vehicles, and that I (we) am (are) to and will comply with it. I (we) certify (or declare), under penalty of perjury, that the foregoing is true and correct.

Date: 10/07/2022

Andres Munoz

Print Name of Applicant/Officer


Signature of Applicant(s)

Signature of Corporate Officer

Manager - COO

Title of Corporate Officer

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
TNC ACCESS FOR ALL
WHEELCHAIR ACCESSIBLE VEHICLE TRAINING DECLARATION FORM**

Carrier Name: Tower WAV LLC

PSG #: 39427-A

Pursuant to Decision 20-03-007 Ordering Paragraph 14(a) and 16(f), all Wheelchair Accessible Vehicle (WAV) drivers operating on TNCs platform shall have completed WAV driver training within the past three years. The required training shall include, at minimum below:

1. Sensitivity training
2. Passenger assistance techniques
3. Accessibility equipment use
4. Door-to-door service
5. Safety procedures

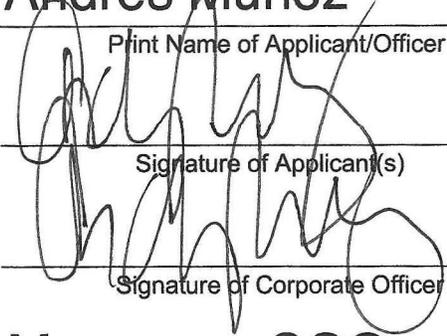
TNCs shall be responsible for ensuring that each of their WAV drivers complies with these requirements and shall maintain records of such compliance for the duration of the program which is scheduled to sunset on January 1, 2026.

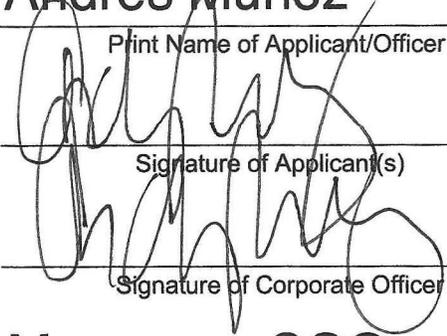
CERTIFICATION

I (we) certify (or declare), under penalty of perjury, that I (we) have read and understand the above requirement that all WAV drivers operating on TNCs platform must have completed WAV driver training within the past three years, and that I (we) am (are) to and will comply with it. I (we) certify (or declare), under penalty of perjury, that the foregoing is true and correct.

Date: 10/07/2022

Andres Munoz
Print Name of Applicant/Officer


Signature of Applicant(s)


Signature of Corporate Officer

Manager - COO
Title of Corporate Officer

ATTACHMENT B

ATTACHMENT B

Uber Technologies, Inc.'s Outreach Narrative and Materials Quarter 3 2022

October 17, 2022

Overview

Uber Technologies, Inc. (Uber) continues its implementation of UberWAV service under the rules developed by the California Public Utilities Commission (CPUC) under the TNC Access for All Act (SB 1376). Between July and September 2022 (Quarter 3 2022), Uber continued outreach to enhance understanding of the UberWAV program, incorporate veteran disability groups into its list of accessibility stakeholders, solicit feedback for improving UberWAV as well as the broader accessibility of the Uber app, field questions from stakeholders, and strengthen ties for further partnerships to promote UberWAV post-pandemic. This quarter's efforts included outreach, education, consultation, research and follow-ups with community groups across Northern and Southern California, and the San Francisco Bay Area.

Core outreach activities in Q3 2022 included:

- **Email and newsletter updates, phone calls, and Q&A with stakeholder organizations**, including veteran disability groups, independent living organizations, community service providers, and community-based organizations.
- **Research and create a new outreach list of veteran disability groups** to raise awareness about UberWAV with a more diverse pool of accessibility stakeholders.
- **Offer presentations** with accessibility groups, independent living organizations, to raise awareness about UberWAV and help community members better utilize the service.

Speaking Engagements

After extensive research and outreach to stakeholder groups throughout Quarter 3, Uber expanded their list of accessibility stakeholders to include veteran disability groups, had the opportunity to speak with two executive directors of veteran disability groups, deliver one presentation (See Section A) on UberWAV's functionality and schedule a presentation for Quarter 4.

The presentation took place on Thursday, July 14, 2022 at the California Disability Services Association (CDSA) member meeting. CDSA is a statewide association representing more than 100 community-based organizations that support and empower people with intellectual and developmental disabilities (I/DD) and their families. CDSA is led by a Board of Directors,

composed of representatives from member organizations like On My Own Services, Adjoin, the Arc of Fresno and Madera Counties and PathPoint. CDSA advocates on behalf of disability groups at the federal level and state level. They work directly with the Department of Developmental Services, the Department of Rehabilitation and legislative offices. A representative from Uber presented to roughly 20 members of the Accessibility Advisory Committee about UberWAV, how to use the service and how riders in wheelchairs can utilize UberWAV.

The representative from Uber also responded to questions and feedback from CDSA members. Questions ranged from the difference between UberWAV and Uber Assist, UberWAV rates and economic accessibility, the training level of WAV drivers, and eligibility for WAV services. CDSA members also expressed that Uber should continue to educate and raise awareness about UberWAV in Northern California as many in need of services could benefit from UberWAV's offerings or do not know about its price-point and on-demand services. After the meeting, the UberWAV outreach team sent resources and UberWAV public information materials mentioned during the meeting.

An upcoming UberWAV presentation is scheduled for Quarter 4 on October 17, 2022 with New Horizons. New Horizons is a nonprofit organization dedicated to empowering individuals with special needs (age 16 and older) to reach their full potential and fulfill their dreams. They offer job training and placement, education, counseling, residential services, social programs and person-centered planning with a focus on community integration.

The UberWAV outreach team has requested or is currently scheduling for Q4 2022 similar presentations and Q&A opportunities with other community-based organizations across Los Angeles, San Francisco, San Diego, Marin, and Santa Clara Counties. These stakeholders include local Regional Centers serving Californians with developmental disabilities, paratransit coordinating councils, veteran disability groups and regional transportation authorities.

Program Information and Community Group Outreach

Between July 1, 2022 and September 30, 2022, the UberWAV outreach program contacted, consulted with, or disseminated program information to California accessibility stakeholders, including veteran disability groups, disability groups, local agencies, community service providers, in-language service providers and community-based organizations. To date the outreach team's growing network of over 350 stakeholders across California receives regular program updates, raises questions and concerns, and facilitates requests to help spread the word about UberWAV.

As part of this outreach, Uber has continued to solicit input on outreach opportunities to reach disabled consumers and provided a California-specific instructional fact sheet on accessing UberWAV to these organizations to share with their constituents. (See Section B). The digital fact sheet is compliant with accessibility requirements to enable public sector entities to post it online, as appropriate.

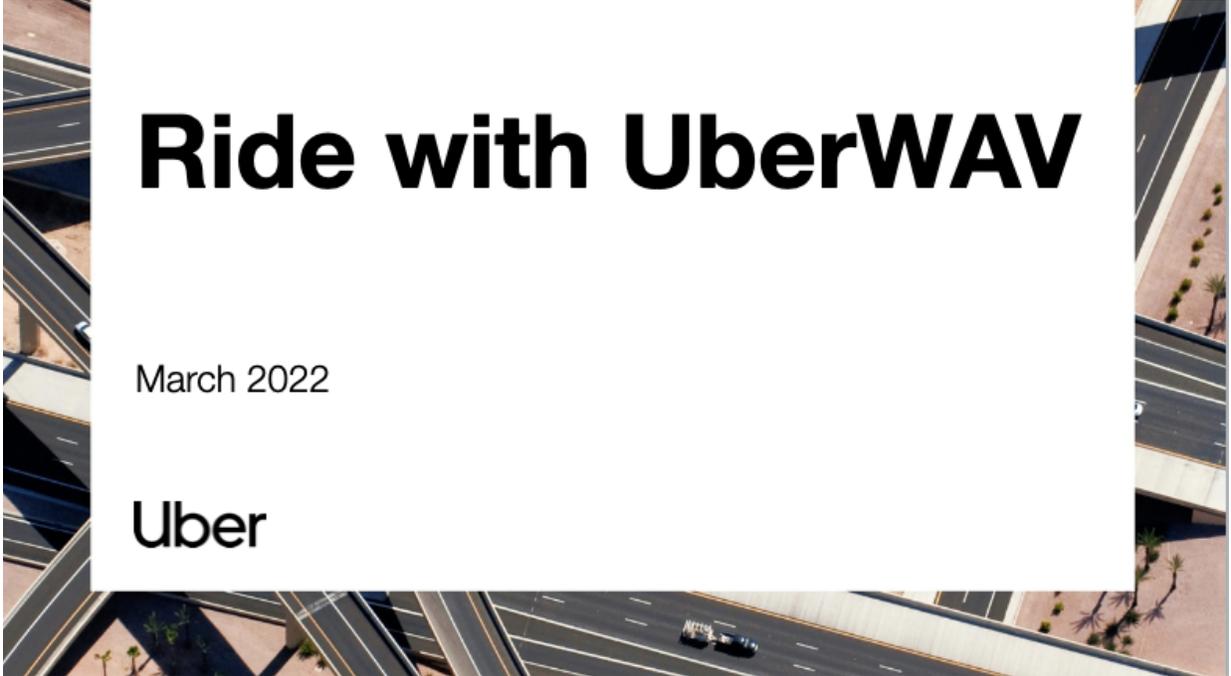
These efforts are supported by a dedicated webpage for UberWAV, as well as an accessibility webpage that provides updates on new products, features, and initiatives to improve the mobility and independence for riders with disabilities. This digital information is available in four languages and includes Frequently Asked Questions, tools for consumers, and a step-by-step explanation of how to use the service. (See Section C).

Section A: Ride with UberWAV Community Presentation

Ride with UberWAV

March 2022

Uber



Intros

Seth Smith

Manager, California Public Policy

seth.smith@uber.com

Agenda

01 What is WAV?

02 How to ride with UberWAV

03 SB 1376 (2018) Access For All

04 Uber + Public Transit

05 Q&A

Accessibility using Uber

Our technology and the transportation provided by drivers has transformed mobility for many people with disabilities, and we're committed to continuing to develop technologies that support everyone's ability to easily move around their communities.



Riders with disabilities

Uber's technology is helping to increase mobility and independence for riders with disabilities, with features and capabilities like these:



Cashless payments

Uber's cashless payment option simplifies the payment process, reducing the need for riders to worry about counting out cash or exchanging bills with a driver.



On-demand transportation

The Uber app makes it easier for riders with disabilities to get from A to B at the touch of a button. They no longer have to arrange rides through a dispatcher or resort to other, less convenient, means of finding a ride.



Upfront pricing

Uber uses upfront pricing to let riders know the cost of their trip before they request a ride. This gives them peace of mind and helps eliminate the risk of fraud.



Anti-discrimination policies

Every trip request a rider makes is automatically matched to a nearby driver by the Uber app, reducing opportunities for unlawful discrimination to interfere with the process of securing reliable, affordable transportation.



Service animal policies

For riders who are blind or low-vision and may be traveling with service animals, Uber's Community Guidelines and Service Animal Policy clearly require drivers to comply with all applicable laws regarding the transportation of service animals.



Share your ETA and location

Riders can easily share their ride details, including the specific route and estimated time of arrival, with loved ones for extra peace of mind. Friends or family members will receive a link where they can see the driver's name, photo, and vehicle information, and track where the rider is on the map in real time until they arrive at their destination—all without downloading the Uber app.



Wait time fee waivers

Riders with disabilities, or individuals who frequently accompany riders with disabilities on trips, can request a waiver of wait time fees for their accounts by submitting a certification.

Riders with mobility disabilities

We're using technology to make transportation more accessible and reliable for riders with mobility disabilities, including through WAV (wheelchair-accessible vehicles).

[Read more](#)



Equipped vehicles

Uber's WAV lets riders who use non-folding motorized wheelchairs connect with drivers in wheelchair-accessible vehicles equipped with ramps or lifts.



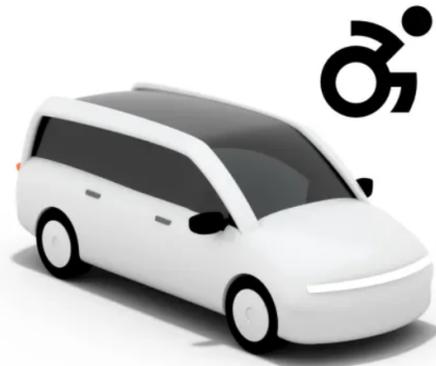
Available around the world

We're using several WAV models in cities around the world (including Bangalore, Boston, Chicago, London, Los Angeles, New York, Philadelphia, San Francisco, Toronto, and Washington, DC) to determine which wheelchair-accessible vehicle options best meet the needs of riders and drivers.

Uber WAV

WAV provides affordable rides in wheelchair-accessible vehicles, where available.

We're committed to developing solutions that support everyone's ability to easily move around their communities. Riders who use motorized wheelchairs or scooters can in certain cities* request a ride in a wheelchair-accessible vehicle (WAV). WAV driver-partners are certified by a third party in safely driving and assisting people with disabilities.



Why ride with Uber WAV



Fast, flexible rides

When and where WAV is available, request a ride on demand that works around your life, not the other way around.



Trips that fit your budget

The price of a WAV ride in the Uber app is comparable to UberX, our basic ride option.



Specialized drivers to assist you

Every person driving with Uber WAV has completed a certification course offered by a third party to help you enter and exit the vehicle.*

How to ride with WAV

[Read more about how riding works](#)

1. Request

Open the app and enter your destination in the "Where to?" box. Once you confirm your pickup and destination addresses are correct, select **WAV** at the bottom of your screen (a promo code is required in some cities). Then tap **Confirm WAV**.

If a WAV driver is available and accepts your ride request, you'll see your driver's picture and vehicle details and can track their arrival on the map.

2. Ride

Check that the vehicle details match what you see in the app before getting in your WAV.

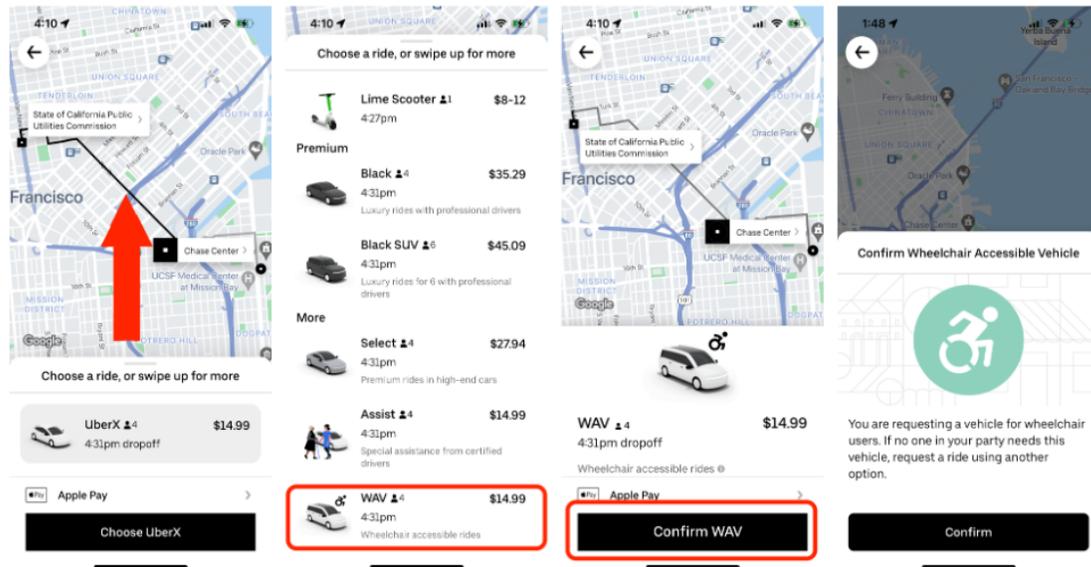
Your driver has your destination and directions for the fastest way to get there, but you can always request a specific route.

3. Exit the vehicle

You'll be automatically charged through your payment method on file, so you can exit your WAV as soon as you arrive.

Remember to rate your driver to help keep Uber safe and enjoyable for everyone.

How to ride with WAV



Intent of State Bill 1376

“It is the intent of the Legislature that wheelchair users who need WAVs have prompt access to TNC services, and for the commission to facilitate greater adoption of wheelchair accessible vehicles on transportation network companies’ online-enabled applications or platforms.”

SB 1376 (2018), Section 3 (adding Public Utilities Code Section 5440(j))

TNC Remittance Offset: Quarterly Evaluation Criteria

Presence & Availability of Drivers with WAVs and Improved Level of Service

- Hours of WAV service
- WAV drivers
- WAV Trips
- Response Time on WAV

Publicize WAV Services to the Disability Community

- Efforts taken by TNC to publicize and promote WAV service to disability communities

Accounting of Funds Expended

- Provide a statement of account for funds expended prepared in accordance with generally accepted accounting principles

Q&A

Thank you

Seth Smith (seth.smith@uber.com)

Uber

Section B: UberWAV Public Information Materials - Digital Fact Sheet

Acceder a WAV con la aplicación Uber

Los vehículos de MV Transportation accesibles para sillas de rueda se encuentran disponibles por medio de la aplicación Uber en el Condado Los Ángeles y el Área de la Bahía de San Francisco

Uber

Cómo solicitar un WAV

Paso 1 → Descargue la aplicación Uber (<https://ubr.to/2wpc9W5>)

Paso 2 → Solicite su WAV

Imagen 1: Comencios pidiendo un viaje como lo haría con cualquier otro viaje, asegurando sus lugares de origen y destino.

Imagen 2: Desplácese hacia abajo hasta la opción WAV

Imagen 3: Elija WAV como su transporte

Imagen 4: Confirme que está solicitando un vehículo accesible para sillas de ruedas.

Spanish language screenshots to replace English language screenshots

Actualmente habilitado para personas con sillas de ruedas motorizadas y scooters en el Condado Los Ángeles y en el área de la Bahía de San Francisco: los condados de San Francisco, Alameda, Contra Costa, Santa Clara, San Mateo, Marin, Sonoma, Solano, Napa y Santa Cruz.

Accessing WAV in the Uber App

MV Transportation's wheelchair accessible vehicles are now available via the Uber app in Los Angeles County and the San Francisco Bay Area

Uber

How to Ride with WAV

Step 1 → Download the Uber App

Step 2 → Request a WAV Step 2(i) - (iv)

Currently available for riders who use motorized wheelchairs and scooters in Los Angeles County and the San Francisco Bay Area—the counties of San Francisco, Alameda, Contra Costa, Santa Clara, San Mateo, Marin, Sonoma, Solano, Napa, and Santa Cruz.

Affordable, On-Demand Rides in Wheelchair-Accessible Vehicles

Fast, flexible rides

When and where WAV is available, rides are requested on demand - simply enter your destination and tap to request.

Trips that fit your budget

WAV rides are priced the same as UberX rides.

Specialized drivers to assist you

WAV drivers complete a certification course offered by a third party in safe wheelchair securement.

Follow UberWAV

What is UberWAV? Website and FAQ (uber.com/ride/uberwav)

A Letter from our CEO on Improving Accessible Service

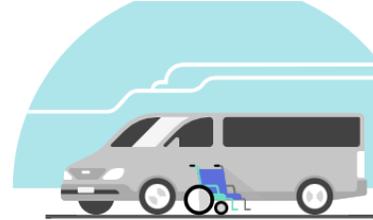
(<https://ubr.to/uberwav>)

Section C: UberWAV Public Information Materials - Webpage

WAV

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sign up to ride

Accessibility at Uber

Our technology has transformed mobility for many people with disabilities, and we're committed to continuing to develop solutions that support everyone's ability to easily move around their communities.*

