

**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](mailto: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

April 15, 2021  
Uber Technologies, Inc.  
PSG0038150  
Advice Letter No. 9

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. 9*

**I. Purpose**

Pursuant to Decision (D.) 20-03-007, Uber Technologies, Inc. (“Uber”) submits this Advice Letter No. 9 to request to offset Quarter 1 of 2021 TNC Access For All Fund<sup>1</sup> fee payments by the amounts Uber spent to improve wheelchair accessible vehicle (“WAV”) service in Quarter 1 of 2021. The requested effective date of this advice letter is May 15, 2021 (30 days from date of filing).<sup>2</sup>

The offset amounts requested by geographic areas are as follows:<sup>3</sup>

County	Expenditures <sup>4</sup> (\$)
ALAMEDA	\$ 82,165.20
ALPINE	\$ -

County	Expenditures (\$)
ORANGE	\$ 12,685.25
PLACER	\$ -

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

<sup>2</sup> As a good faith participant in the TNC Access for All program, Uber is submitting 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.

<sup>3</sup> Uber requested a fee exemption for Contra Costa, Riverside, and Orange Counties for Q4 2020 - Q3 2021 in its Advice Letter No. 7 and 7A Supplement. This request has not yet been approved. Advice Letter No. 9 requests fee offsets for these counties in the event that such exemption requests are not approved.

<sup>4</sup> 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.

<b>AMADOR</b>	\$ -
<b>BUTTE</b>	\$ -
<b>CALAVERAS</b>	\$ -
<b>COLUSA</b>	\$ -
<b>CONTRA COSTA</b>	\$ 25,451.58
<b>DEL NORTE</b>	\$ -
<b>EL DORADO</b>	\$ -
<b>FRESNO</b>	\$ -
<b>GLENN</b>	\$ -
<b>HUMBOLDT</b>	\$ -
<b>IMPERIAL</b>	\$ -
<b>INYO</b>	\$ -
<b>KERN</b>	\$ -
<b>KINGS</b>	\$ -
<b>LAKE</b>	\$ -
<b>LASSEN</b>	\$ -
<b>LOS ANGELES</b>	\$ 638,350.00
<b>MADERA</b>	\$ -
<b>MARIN</b>	\$ 1,670.17
<b>MARIPOSA</b>	\$ -
<b>MENDOCINO</b>	\$ -
<b>MERCED</b>	\$ -
<b>MODOC</b>	\$ -
<b>MONO</b>	\$ -
<b>MONTEREY</b>	\$ -

<b>PLUMAS</b>	\$ -
<b>RIVERSIDE</b>	\$ 820.78
<b>SACRAMENTO</b>	\$ 594.19
<b>SAN BENITO</b>	\$ -
<b>SAN BERNARDINO</b>	\$ -
<b>SAN DIEGO</b>	\$ -
<b>SAN FRANCISCO</b>	\$ 158,384.30
<b>SAN JOAQUIN</b>	\$ -
<b>SAN LUIS OBISPO</b>	\$ -
<b>SAN MATEO</b>	\$ 51,019.90
<b>SANTA BARBARA</b>	\$ -
<b>SANTA CLARA</b>	\$ -
<b>SANTA CRUZ</b>	\$ 594.19
<b>SHASTA</b>	\$ -
<b>SIERRA</b>	\$ -
<b>SISKIYOU</b>	\$ -
<b>SOLANO</b>	\$ 594.19
<b>SONOMA</b>	\$ -
<b>STANISLAUS</b>	\$ 3,565.14
<b>SUTTER</b>	\$ -
<b>TEHAMA</b>	\$ -
<b>TRINITY</b>	\$ -
<b>TULARE</b>	\$ -
<b>TUOLUMNE</b>	\$ -
<b>VENTURA</b>	\$ 1,159.76

<b>NAPA</b>	\$ -
<b>NEVADA</b>	\$ -

<b>YOLO</b>	\$ -
<b>YUBA</b>	\$ -

**Subtotal** \$ 747,636.95

**Subtotal** \$ 229,417.70

**Total Offset** \$ 977,054.65

## II. Background

In 2018, Senate Bill (SB) 1376, the “TNC Access for All Act,” was enacted by the California Legislature.<sup>5</sup> 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.<sup>6</sup>

Uber recognizes its unique position as a TNC to enable increased access to third-party WAVs<sup>7</sup> 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

<sup>5</sup> S.B. 1376; *see also* Pub. Util. Code § 5440.5.

<sup>6</sup> D.20-03-007, Decision on Track 2 Issues: Offsets, Exemptions and Access Provider Disbursements (“D.20-03-007”), March 19, 2020; Pub. Util. Code § 5440.5(a)(1)(B)(ii).

<sup>7</sup> 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, at a minimum, 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, even with ridership down in Quarter 1 of 2021 due to the COVID-19 pandemic, Uber spent over \$2.5 million on payments to third-party partners with WAVs. Further, Uber is investing heavily to keep WAV trips priced the same as a similar UberX trip. Uber requests the Commission evaluate the supporting documentation provided in light of the amount spent to enable WAV service.

In Quarter 1 of 2021, UberWAV was able to maintain supply levels and increase reliability, even as demand fluctuated, and in most instances, grew. UberWAV service levels continued to ramp up in San Francisco Bay Area counties due to Uber's new partnership with Tower WAV LLC (launched in Quarter 4 of 2020). This partnership has improved UberWAV reliability in the San Francisco Bay Area, and we expect further improvement in the coming quarters.

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 seeks improved accessibility on the Uber platform. However, 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.

In accordance with D.20-03-007 and the templates provided by the Commission, Uber provides the following supporting information within this Advice Letter "38150 Uber Technologies, Inc. AL 9 Forms" and accompanying Attachment A (Training and Inspections Declarations), Attachment B (Accounting of Funds Expended Certification), and Attachment C (Outreach Materials Narrative); and the master data sheet entitled "38150 Uber Technologies, Inc. AL 9 Data."

### **1. Number of WAVs in Operation**

Data for the number of WAVs in operation throughout California in Quarter 1 of 2021 is provided in the tab "WAVs in Operation." 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. Number and Percentage of WAV Trips**

Data for the number and percentage of WAV trips throughout California, in Quarter 1 of 2021, is provided in tabs "WAV Trips Completed" through "%WAV Trips Cancelled Driver" and includes data on trips completed, not accepted, cancelled by passenger, and cancelled by driver, aggregated by the hour of the day and day of the week.

Uber cannot provide information regarding the number of WAV trips cancelled 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.

Notably, it is difficult to evaluate trends during this nascent stage of the WAV program, and some WAV trip percentages may not be meaningful. Given the very low demand and trip numbers and minimal amounts of data available in the early stages of this program, and the impact on both supply and demand due to the COVID-19 pandemic, variances in the data may appear exaggerated, and true improvement may be difficult to assess through analysis of these percentage rates alone. Additionally, the number and percentage of WAV trips can be impacted by the geographical and temporal distribution of WAV trip requests.

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.

Uber has also included data for “Cancellations - Completed” and “Cancellations - Not Completed” based on the CPUC’s latest reporting instructions and revised data template.<sup>8</sup>

### **3. Completed WAV Trip Request Response Times**

Data for response times for completed WAV Trips by Decile, including Periods A and B, is provided in the tab “Offset Response Time.”

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 also 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. We caution the Commission against only using response time improvements to measure success, as requiring progressively shorter response

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<sup>8</sup> 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” tab of the templates. Similar to previous instructions regarding counting trips, Uber has reported cancelations for the day and hour of the ultimate trip event.

time thresholds may disincentivize expansion or improvement of WAV service by measures other than response time.

Indeed, improvements to service levels can be demonstrated in a multitude of ways, beyond response times. Reduced numbers of complaints may indicate that service is improving. Further, improved service levels can be demonstrated by sustaining response times and expanding service through an increasing number or percentage of completed WAV trips, increasing the number of hours when WAVs are available on the platform, or providing service in previously unserved or underserved counties.

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.

#### **4. Outreach Efforts**

Information is provided regarding outreach efforts in the tab “Outreach Efforts,” and related substantive materials are attached to this Advice Letter filing as Attachment C. In the tab “Outreach Efforts” 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.

#### **5. Complaints**

Information is provided regarding complaints related to WAV services for each geographic area in the tab “Complaints.” 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.

#### **6. Accounting of Funds Expended**

An accounting of certain funds expended in Quarter 1 of 2021 is included in the tab “Funds Expended,” along with a certification sheet in tab “Funds Expended Certification,” which is also included in this Advice Letter as Attachment B.

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.

**7. Contract Information**

Information regarding contracts with service providers is in the tab “Contract Information.” 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(s)” indicates that the provider associated with that entry is eligible to provide trips starting in all California counties.

**8. Certification of WAV Driver Training**

Information regarding WAV Driver Training is provided in the tab “Training and Inspections” and certifications are provided within Attachment A.

**9. WAV Driver Programs Used and Number of WAV Drivers That Completed the Training**

Information regarding WAV Driver Training is provided in the tab “Training and Inspections.” 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.

**10. Certification That All WAVs Operating On Its Platform Have Been Inspected and Approved to Conform with Americans with Disabilities Act (ADA) Accessibility Specifications**

Information regarding WAV inspections is provided within the tab “Training and Inspections” and certifications are provided within Attachment A.

\* \* \* \* \*

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 April 15, 2021. 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](mailto: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](mailto: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](http://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 HAS BEEN EXAMINED BY ME AND IS TRUE, CORRECT AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.**

Respectfully submitted,

/s/ Adam Bierman

Adam Bierman  
Counsel, Regulatory  
Uber Technologies, Inc.

Attachments



[CPUC Home](#)

## CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

**PROCEEDING: R1902012 - CPUC - OIR TO IMPLEM**  
**FILER: CALIFORNIA PUBLIC UTILITIES COMMISSION**  
**LIST NAME: LIST**  
**LAST CHANGED: APRIL 5, 2021**

[Download the Comma-delimited File](#)  
[About Comma-delimited Files](#)

[Back to Service Lists Index](#)

## Parties

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 FOR: NOMAD TRANSIT LLC DBA VIA

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 TRANSPORTATION (LADOT)

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 LA COUNTY METROPOLITAN TRANSPORT AUTHOR  
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ROBYN WAPNER  
 SR. GOV'T RELATIONS ANALYST

MARK POTTER  
 ALTRUISTIC INC DBA BOUNCE

4/15/2021

CPUC - Service Lists - R1902012

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COMMISSION

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## Information Only

---

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# **ATTACHMENT A**

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

Carrier Name: MV TRANSPORTATION

PSG #: 0012064-B

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: 4/6/21

KEITH MULLO

Print Name of Applicant/Officer

[Signature]  
Signature of Applicant(s)

[Signature]  
Signature of Corporate Officer

V.P. Strategic Ops

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**

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Date: 4/7/2021

ANDRES MUNOZ  
Print Name of Applicant/Officer

[Signature]  
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: \_\_\_\_\_

PSG #: \_\_\_\_\_

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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: \_\_\_\_\_

\_\_\_\_\_  
Print Name of Applicant/Officer

\_\_\_\_\_  
Signature of Applicant(s)

  
\_\_\_\_\_  
~~Signature of Corporate Officer~~

\_\_\_\_\_  
Title of Corporate Officer

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

Carrier Name: MV TRANSPORTATION

PSG#: 0012064-B

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.

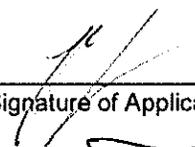
CERTIFICATION

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: 4/6/21

KEITH MBULO

Print Name of Applicant/Officer

  
Signature of Applicant(s)

  
Signature of Corporate Officer

V. P. Strategic Ops

Title of Corporate Officer

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

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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: 4/7/2021

ANDRES MUNOZ

Print Name of Applicant/Officer

[Handwritten Signature]

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 INSPECTION DECLARATION FORM**

Carrier Name: \_\_\_\_\_

PSG#: \_\_\_\_\_

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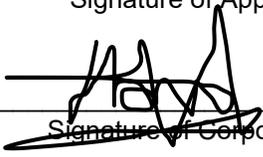
**CERTIFICATION**

**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: \_\_\_\_\_

\_\_\_\_\_  
Print Name of Applicant/Officer

\_\_\_\_\_  
Signature of Applicant(s)

  
\_\_\_\_\_  
Signature of Corporate Officer

\_\_\_\_\_  
Title of Corporate Officer

# **ATTACHMENT B**

**APPENDIX A**

**Uber Technolgies, Inc. Cost Summary**

**Reporting Period Q1 2021**

<b>Vehicle Costs</b>	\$ -
Lease/Rental/Purchase Costs	\$ -
Rental Subsidies for Driver	\$ -
Inspections	\$ -
Maintenance, Service & Warranty	\$ -
Fuel Cost	\$ -
Cleaning Supplies/Services	\$ -
Other (Describe)	\$ -
<b>Partnership Costs</b>	\$ 2,666,441.02
Transportation Service Partner Fees/Incentives and/or Management Fees	\$ 2,653,636.86
Vehicle Subsidies	\$ -
Consultants/Legal	\$ 12,804.16
Other (Describe)	\$ -
<b>Marketplace Costs</b>	\$ -
Recruiting	\$ -
Driver Onboarding	\$ -
Training Costs	\$ -
Driver Incentives	\$ -
Promo Codes for WAV	\$ -
Other (Describe)	\$ -
<b>Operational Costs</b>	\$ 42,541.45
Marketing Costs	\$ -
Technology Investments/Engineering Costs/Enhancements	\$ -
Community Partnership/Engagement Costs	\$ -
Rental Management	\$ -
Pilot Management	\$ -
Wages, Salaries and Benefits (non-maintenance personnel)	\$ 42,541.45
Other (Describe)	\$ -
<b>Other (Describe)</b>	\$ -
<b>Total Expended</b>	\$ 2,708,982.47
<b>Total Offset Requested</b>	\$ 977,054.65

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing cost summary has been examined by me and is true, correct and complete to the best of my knowledge and belief.



Signature: \_\_\_\_\_

Preparer: Uber Technologies, Inc.

Address: 1515 3rd Street, San Francisco, CA 94158

Title: Director, Central Operations

Date: April 15, 2021

Phone: (707) 572-5216

Email: WestRegs@uber.com

# **ATTACHMENT C**

## **Uber Technologies, Inc.'s Outreach Materials Narrative Quarter 1 2021**

April 15, 2021

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### **Overview**

Uber Technologies, Inc. (Uber) continues its implementation of UberWAV service under the rules developed by the California Public Utilities Commission (CPUC) to implement the TNC Access for All Act (SB 1376). Between January and March 2021 (Quarter 1 2021), 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 focused on outreach, education, consultation, and follow-ups with community groups across Southern California and the San Francisco Bay Area.

Elements of ongoing UberWAV outreach have included: program information provided in-language and in accessible formats; informational fact sheets, newsletters, and webpages; driver training and education via a third-party partner; distribution of informational materials and engagement with stakeholder organizations.

### **Program Information and Community Group Outreach**

Between January 2021 and March 2021, the UberWAV outreach program contacted, consulted with, or disseminated program information to more stakeholder organizations, including disability groups, local agencies, community service providers, in-language service providers and community-based organizations.

In March, the UberWAV outreach team distributed the first in a series of quarterly newsletters to over 200 community organizations across Alameda, Contra Costa, Los Angeles, Marin, Orange, Riverside, San Francisco, Sonoma, San Mateo, Santa Clara, and Ventura counties. The quarterly newsletter (*See Section A*) provided stakeholders with recent improvements and investments Uber has made to make its platform more accessible, including a program update on UberWAV, recent accessible technology improvements, and Uber's vaccination transportation partnerships. Groups forwarded the quarterly accessibility newsletter to their stakeholders, and several stakeholders opted in to future communications. As part of this outreach, Uber has requested feedback 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.

Quarter 1 2021 outreach also included updates to accessibility groups on Uber’s Door-to-Door Safety Standard<sup>1</sup>, which includes new measures that are designed to help protect the health and safety of everyone who uses the platform during the pandemic. Safety features like Uber’s Mask Verification for riders and drivers have been of particular interest for community organizations, including senior centers, health clinics, and community service collaboratives.

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. (See Section C). 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.) This quarter, Uber’s accessibility outreach team developed a new outreach presentation for use with community groups.

### **Community Consultation on Accessibility Improvements**

In January, the UberWAV outreach team escalated feedback from a community representative on how to improve platform accessibility to Uber’s Rider app product team, which is considering the recommendation. The San Francisco-based stakeholder requested that Uber explore adding an audio representation of a vehicle’s route and location as it is arriving to pick up a rider. For blind and low-vision users, the estimated arrival time is helpful, but it currently does not provide information on the direction the driver’s vehicle is traveling from or whether it will arrive on the same side of the street where the rider is waiting. The outreach team served as a conduit between the community representative and Uber’s product team to further understand the needs of users with visual impairments and potential technology solutions.

The UberWAV outreach team has since reached out to the Lighthouse for the Blind for additional input on how to make the Uber app more accessible to users who are blind or low-vision—and it continues to solicit feedback from community organizations about other potential improvements to make UberWAV and the rest of the Uber app more accessible to everyone.

### **Vaccine Transportation Education**

Millions of older adults, medically vulnerable, and low-income people of color who are at higher risk of contracting the virus do not have cars, do not drive, or do not live near public transit.<sup>2</sup> That is why Uber has partnered with the National Urban League, the Morehouse School of

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<sup>1</sup> Uber, *Safety*, at <https://www.uber.com/us/en/safety/> (last visited April 15, 2021).

<sup>2</sup> Bergal, Jenni, *Without a Ride, Many in Need Have No Shot at COVID-19 Vaccine*, Pew (Feb. 1, 2021), at <https://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2021/02/01/without-a-ride-many-in-need-have-no-shot-at-covid-19-vaccine>.

Medicine, and the National Action Network — organizations with deep ties to communities of color that have been disproportionately hurt by the pandemic. Alongside community partners, Uber is working to ensure that communities of need can get to and from their vaccine appointments. Uber is partnering with GoGoGrandparent to help coordinate rides and vaccine appointments over the phone for those who are unable to request a ride by themselves. And here in California, Uber has teamed up with the City of Los Angeles to provide 15,000 free rides — and another 20,000 rides half-off — to bring South L.A. residents to USC for vaccination appointments. Uber's contribution amounts to \$500,000 worth of rides, making it the largest commitment of its kind anywhere in the country.

In March, the UberWAV outreach team raised awareness about Uber's Los Angeles partnership by contacting 31 community groups based in South L.A., including health clinics, community centers, senior services organizations, disability groups, and immigration service organizations. These community-based organizations also serve wheelchair users, and the outreach team provided UberWAV program information in English and Spanish — and requested that these organizations distribute the program materials to members via their communications channels.

Q1 2021

# California Accessibility Update

Uber

## Uber Prioritizes Platform Accessibility

California's commitment to accessibility is woven into much of the fabric of this state with policies at every level of government enacted to ensure access for all. We're proud of this and as a California based company, Uber believes that our platform must serve all riders. This is why we have implemented solutions across our platform designed to support everyone's ability to easily move around their communities.



Our app's technology along with the transportation options we deliver to riders have given new mobility to many people with disabilities. We continue to put our energy towards expanding our platform and investing in new technologies that make it possible for people to move around their communities easily.

Uber makes transportation more accessible through several foundational features such as:

## Policies and technology that support all riders

- **Cashless payment option** that simplifies the payment process;
- **Anti-discrimination policies** that help prevent unlawful discrimination from interfering with securing reliable, affordable transportation by matching ride requests with nearby drivers;
- **On-demand transportation** that makes it simple for riders with disabilities to get to their destinations quickly and without having to pre-arrange rides far in advance
- **Upfront pricing** lets riders know the cost of their trip before they finalize their ride, helping eliminate the risk of fraud
- **Braille display compatibility** through the app is available for IOS and Android users to make it easier for riders who are blind or low vision to get to their destination.
- **Service animal policies** mean that riders who are blind or low vision can travel with their service animals;
- **Assistive technology** such as visible and vibrating alerts and voice command options help riders who are deaf or hard of hearing use the Uber app; and
- **ETA and location sharing** features help friends and family members know where their loved one is traveling and when they'll arrive at their destination and this can be done all without downloading the Uber app.

# UberWAV expands mobility options

At Uber, we're committed to developing solutions that support everyone's ability to easily move



around their communities. With the launch of UberWAV in California, we've been able to better serve persons with disabilities by offering an on-demand transportation option to get riders where they need to go. This offering lets riders who rely on non-folding motorized wheelchairs connect with drivers in wheelchair accessible vehicles featuring ramps or lifts. This fast, flexible service costs no more than our standard UberX ride, while offering response times that are far prompter than other

WAV transportation options such as paratransit. In 2020, we provided over 22,000 WAV trips across California.

We also know there's more work ahead. We continue to seek out and partner with new providers. We're adding in new features to improve supply and reliability, such as our planned expansion into WAV rentals and exploration of a reservations solution to improve rider experience.

And we want to hear from you about how we can improve our UberWAV services as it improves.

## Destination vaccination

With vaccine distribution ramping up and the lowering of COVID-19 cases, our services will again be relied on by many who use Uber as their main transportation option and others who use it for specific trips. We are preparing now and have company policies that ensure the health and safety of all our riders and drivers. Uber offers multiple products that can be used at the state level or even by individual cities, counties or health systems to help get people to their vaccination appointments. Millions of older adults and low-income people of color who are at higher risk of contracting the virus don't have cars, don't drive, or don't live near public transit.<sup>1</sup> Which is why we've partnered with the National Urban League, the Morehouse School of Medicine, and the National Action Network— organizations with deep ties to communities of color that have been disproportionately hurt by the

pandemic. Alongside our community partners, we are working to ensure that communities of need to and from their vaccine appointments.

Uber is partnering with GoGoGrandparent to help coordinate rides and vaccine appointments over the phone for those who are unable to request a ride by themselves.

And here in California, Uber has teamed up with the City of Los Angeles to provide 15,000 free rides — and another 20,000 rides half-off — to bring South L.A. residents to USC for vaccination appointments. Uber's contribution amounts to \$500,000 worth of rides, making it the largest commitment of its kind anywhere in the country.

"Equity drives every facet of our strategy to end the pandemic, but our efforts will come up short unless we shorten the distance between life-saving vaccines and our hardest-

hit Angelenos," said **Mayor Eric Garcetti**. "Our City is determined to deliver doses to residents of South L.A. and every community — and our partnerships with both USC and Uber will enable us to get shots into the arms of thousands more Angelenos every day and move us closer to defeating COVID-19."



<sup>1</sup> <https://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2021/02/01/without-a-ride-many-in-need-have-no-shot-at-covid-19-vaccine>

Interested in hearing more?  
Let us know!

Ramona Prieto ([ramona.prieto@uber.com](mailto:ramona.prieto@uber.com))  
California Public Affairs & Policy Manager, 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 Angeles 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: Comience pidiendo un viaje como lo haría con cualquier otro viaje, seleccionando sus lugares de origen y destino.

Imagen 2: Desplácese hacia abajo hasta la opción WAV

Imagen 3: Elija WAV como su transporte un vehículo accesible para sillas de ruedas.

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 Angeles 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)

(i) (ii) (iii) (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](https://uber.com/ride/uberwav))

A Letter from our CEO on Improving Accessible Service

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

## Section C: UberWAV Public Information Materials - Webpage

Uber Products Company Safety Help COVID-19 resources

EN Log in Sign up

### 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.



sign up to ride

Uber Products Company Safety Help

EN Log in Sign up

### 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.\*

