



R.19-02-012 “TNC Access For All”

Advice Letter Process

&

Reporting Requirement Training

Pursuant to D.20-03-007



April 1, 2020





Housekeeping

- This Presentation is being recorded.
- Phone lines will not be open and will be on mute for the duration of the presentation.
- Staff will Monitor the Chat box. Please let us know if you cannot hear us or see the slides any time during the presentation.
- We will answer all questions at the end of the presentation.
- This Power Point Presentation along with the required templates will be posted on CPUC website <https://www.cpuc.ca.gov/tncaccessAL/>
- If you have any additional questions after the training, please contact TNCAccess@cpuc.ca.gov.





Agenda

- A. Advice Letter Basics
- B. Filing Advice Letters for TNCs
 - i. What to file
 - ✓ Required forms, letters and declarations
 - ✓ Data templates for Retroactive, Offsets, Exemptions and Quarterly Reports
 - ✓ Claims Process
 - ii. When to file
 - iii. How to file
- C. Short Break
- D. Filing Protests, Responses & Replies
- E. Q & A



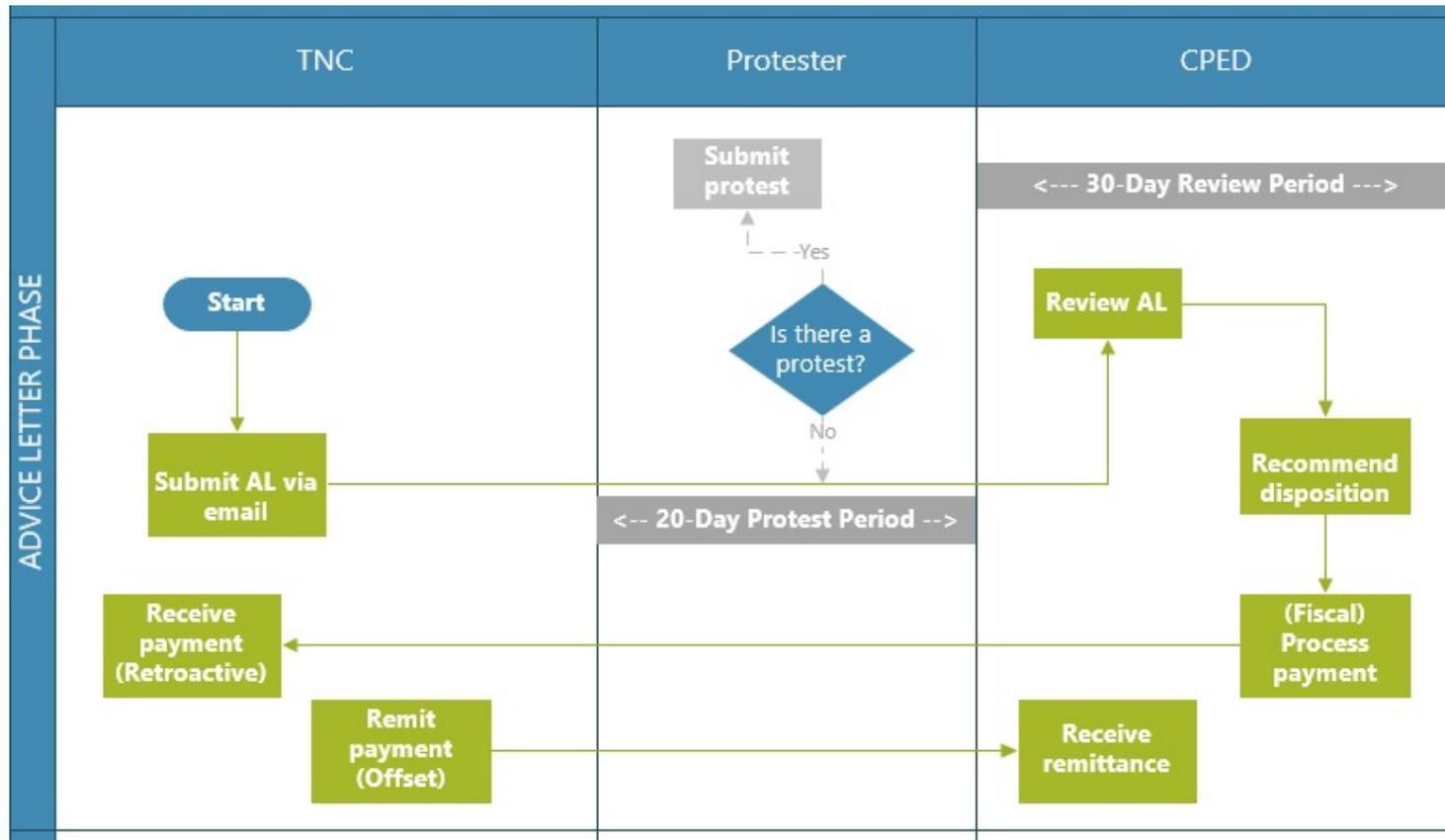


Step-by-Step Guide for Filing Advice Letters and Supplements





Overview of the AL Process





Advice Letter Basics

Definition

- An Advice Letter or AL is an informal request by a carrier for CPUC approval or authorization outside a formal proceeding

Requirements

- General Rules for filing advice letters are available in GO 96-B with modifications mentioned in D.20-03-007

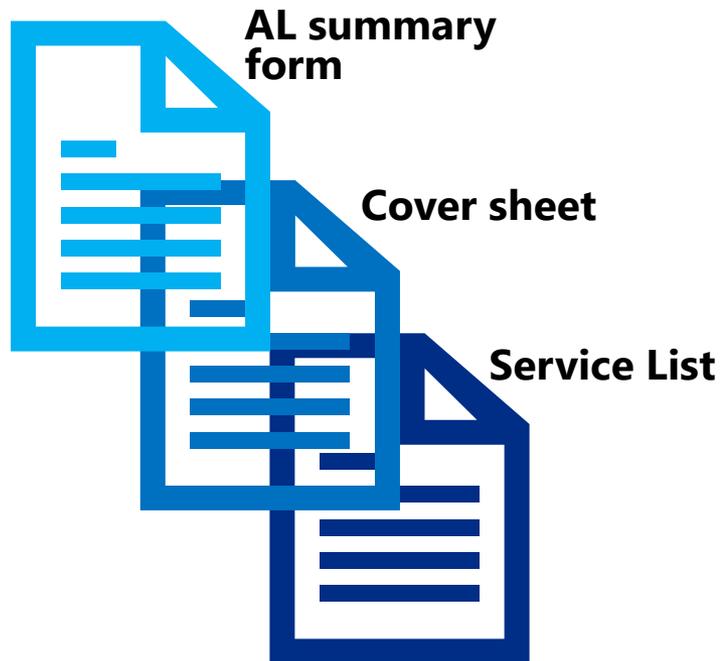
- ✓ **All ALs must be served to the R19.02.012 service list**
- ✓ **Parties can protest, reply or respond**
- ✓ **TNCs can file AL between the 1st and 15th day after quarter ends**
- ✓ **Initial review period: 30 days from date of filing**





Step 1. Prepare the advice letter (AL)

An AL filing has four key components:



Supporting documents



Excel data templates

- WAV presence & availability
- WAV response times
- accounting of funds expended
- marketing / outreach
- complaints

WAV training declaration

WAV inspection declaration

Form std204 (One-time)

Claim Form if necessary





Step 1. Prepare the advice letter (AL)

1.1 Complete the AL summary form

- ✓ **AL Filing must be filed sequentially**
- ✓ **Number [1, 2, 3...] for the original AL**
- ✓ **Number & Letter [1A, 1B, 1C...] for the supplemental AL**

CALIFORNIA PUBLIC UTILITIES COMMISSION Consumer Protection and Enforcement Division Advice Letter Summary Form			
TNC & AL FILER INFORMATION			
Date of Submission: 4/15/20		Date of Service: 4/15/20	
TNC Name: XYZ		PSG #: 12345	
DBA Name:			
Address: 1 XYZ Circle			
City: San Francisco		State: CA	ZIP Code: 94111
Filer's Name: John Smith			
Filer's Email: jsmith@xyz.com		Filer's Phone: 415-555-1234	
AL INFORMATION			
Advice Letter #: 1		AL Type: <input checked="" type="checkbox"/> Offset <input type="checkbox"/> Retroactive <input type="checkbox"/> Exemption	
Geographic Area(s): San Diego, Santa Clara, Alameda, Sacramento, Contra Costa, Ventura, San Joaquin, Stanislaus, Santa Barbara, Solano, San Luis Obispo, Santa Cruz, Shasta, Imperial, Madera			
Offset/Retroactive Amount: \$ 550,000.00		Quarter: Q1	Year: 2020
Documents Included: <input checked="" type="checkbox"/> Cover Letter <input checked="" type="checkbox"/> Service List <input checked="" type="checkbox"/> Training Declaration <input checked="" type="checkbox"/> Marketing Materials <input checked="" type="checkbox"/> Signed Accounting of Funds <input checked="" type="checkbox"/> Inspection Declaration <input checked="" 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:	





Step 1. Prepare the advice letter (AL)

1.2 Prepare the AL cover letter

- A cover letter summarizes the content of the advice letter.
- Per G.O. 96-B, an incomplete cover letter may result in rejection of the AL filing.





Step 1. Prepare the advice letter (AL)

What should a cover letter contain?

A. Date of submission

C. CPUC authority (decisions, resolutions, GO, PU Codes, etc.)

April 15, 2020
ABC Transportation
Advice Letter No. 1

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

Pursuant to Decision (D.) 20-03-007, ABC Transportation submits this Advice Letter No. 1 to request to offset, against the quarterly Access Fund payments due, the amounts spent by ABC Transportation to improve wheelchair accessible vehicle (WAV) service in Quarter ___ of 2019. The requested effective date is May 15, 2020 (30 days from date of filing).

The offset amounts requested by geographic areas are as follows:

County	Expenditures (\$)	County	Expenditures (\$)
ALAMEDA		ORANGE	
ALPINE		PLACER	
AMADOR		PLUMAS	
BUTTE		RIVERSIDE	
CALAVERAS		SACRAMENTO	
COLUSA		SAN BENITO	
CONTRA COSTA		SAN BERNADINO	
DEL NORTE		SAN DIEGO	
EL DORADO		SAN FRANCISCO	
FRESNO		SAN JOAQUIN	
GLENN		SAN LUIS OBISPO	
HUMBOLDT		SAN MATEO	
IMPERIAL		SANTA BARBARA	
INYO		SANTA CLARA	
KERN		SANTA CRUZ	
KINGS		SHASTA	
LAKE		SIERRA	
LASSEN		SISKIYOU	
LOS ANGELES		SOLANO	
MADERA		SONOMA	
MARIN		STANISLAUS	
MARIPOSA		SUTTER	
MENDOCINO		TEHAMA	
MERCED		TRINITY	
MODOC		TULARE	
MONO		TUOLUMNE	
MONTEREY		VENTURA	
NAPA		YOLO	
NEVADA		YUBA	
Subtotal	\$ -	Subtotal	\$ -
Total Offset		\$ -	

B. Brief description of the AL

D. Effective date

E. Date served on parties

F. Language about filing and serving the protest or response

Per D.20-03-007, ABC Transportation provides the following documents in support of its request:

- Number of WAVs in operation – aggregated by hour of the day and day of the week
- Number and percentage of WAV trips completed, not accepted, cancelled by passenger, cancelled due to passenger no-show, and cancelled by driver – aggregated by hour of the day and day of the week
- Completed WAV trip request response times in deciles as well as Periods A and B in deciles
- Evidence of outreach efforts
- Accounting of Funds expended
- Certification of WAV driver training
- WAV driver programs used and number of WAV drivers that completed the training in the quarter
- Certification that all WAVs operating on its platform have been inspected and approved to conform with Americans with Disabilities Act (ADA) Accessibility Specifications

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, 2020. If there are any questions regarding this advice letter, please contact _____ (TNC's contact info).

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 John Smith (TNC contact person) at _____ (TNC email address).

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 HAS BEEN EXAMINED BY ME AND IS TRUE, CORRECT AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Yours truly,

John Smith
Title
ABC Transportation

Attachments

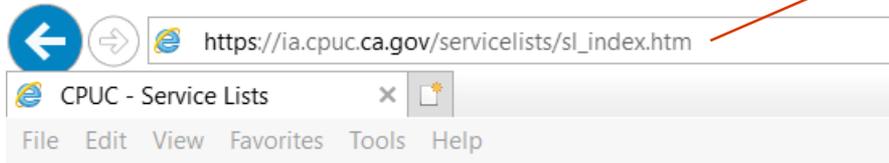


Step 1. Prepare the advice letter (AL)

1.3 Obtain the R.19-02-012 service list

Pursuant to G.O. 96-B AL must be served to the appropriate Service List.

A. Go to the [R.19-02-012 service list](https://ia.cpuc.ca.gov/servicelists/sl_index.htm) site



R1812006 LIST	18-MAR-2020	CPUC
R1901006 LIST	10-MAR-2020	CPUC
R1901011 LIST	19-MAR-2020	CPUC
R1902012 LIST	12-MAR-2020	CALIFORNIA PUBLIC UTILITIES COMMISSION
R1903009 LIST	12-MAR-2020	CPUC

B. Select appropriate list





Step 1. Prepare the advice letter (AL)

Where and how to download the service list?

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: R1902012 - CPUC - OIR TO IMPLM
FILER: CALIFORNIA PUBLIC UTILITIES COMMISSION
LIST NAME: LIST
LAST CHANGED: MARCH 12, 2020

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

[Back to Service Lists Index](#)

C. Download the list

Parties

ALEX LAVOI
NOMAD TRANSIT LLC DBA VIA
10 CROSSBY STREET, 2ND FL.
NEW YORK, NY 10013
FOR: NOMAD TRANSIT LLC DBA VIA

JONATHAN COHEN
LITIGATION AND REGULATORY COUNSEL
VIA TRANSPORTATION INC.
95 MORTON STREET, 3RD. FL.
NEW YORK, NY 10014
FOR: VIA TRANSPORTATION INC.

EDWARD HOFFMAN
RIDE PLUS, LLC
1275 PEACHTREE ST NE 6TH FL
ATLANTA, GA 30309
FOR: RIDE PLUS LLC DBA PROVADO MOBILE
HEALTH

TRISH KRAJNIAK
HOPSKIPDRIVE INC.
1933 S. BROADWAY STE. 1144
LOS ANGELES, CA 90007
FOR: HOPSKIPDRIVE INC.

JARVIS MURRAY
ADMIN - FOR-HIRE POLICY & ENFORCEMENT
LA DEPT OF TRANSPORTATION
100 S. MAIN STREET
LOS ANGELES, CA 90012
FOR: LOS ANGELES DEPARTMENT OF
TRANSPORTATION (LADOT)

WIL RIDDER
EXE. OFFICER - PLANNING & DEVELOPMENT
LA COUNTY METROPOLITAN TRANSPORT AUTHOR
ONE GATEWAY PLAZA, MS 99-23-3
LOS ANGELES, CA 90012

D. Open in Excel and save as PDF
and attach with AL Filing

Do you want to open or save R1902012_86476.csv (21.9 KB) from ia.cpuc.ca.gov? x





Step 1. Prepare the advice letter (AL)

1.4 Prepare supporting documents

- ✓ Supporting documents vary by the type of AL request
 - e.g. Retroactive, Offset, or Exemptions
- ✓ Generally, supporting documents have two types: data reporting and forms/declarations

(see following slide for an overview of what to file and when to file)

Note: Data templates and forms/declaration will be posted at www.cpuc.ca.gov/tncaccessAL/





Summary of all requirements by type of AL

TNC Access for All				
TNC Submittal Checklist				
	RETROACTIVE (one-time filing)	OFFSET (recurring filing)	EXEMPTIONS (recurring filing)	QUARTERLY REPORT (recurring filing)
	(Due April 15, 2020 for each quarter)	(Due 15 days after end of each quarter)	(Due 15 days after end of fourth quarter)	(Due 30 days after end of each quarter beginning after July 1, 2020 (July 30))
ADVICE LETTER	✓	✓	✓	
Summary Form (PDF)	✓	✓	✓	
Signed Cover Letter (PDF)	✓	✓	✓	✓
WAVs in Operation (Excel)	✓	✓	✓	✓
Number and % of WAV Trips Completed, not accepted, cancelled by passenger, cancelled due to passenger no-show, and cancelled by driver (Excel)	✓	✓	✓	✓
Response Time (Excel)	✓	✓	✓	✓
"Offset Response Time", meeting offset time standard at Level 1 or Level 2 (Excel)		✓		
"Retroactive Response Time", 50% of completed trip improved quarter over quarter (Excel)	✓			
"Exemption Response Time", 80% 4 quarters at Level 2 (Excel)			✓	
Outreach Efforts (Excel)	✓	✓	✓	✓
Outreach Materials (PDF)	✓	✓	✓	✓
Training and Inspections (Excel)		✓	✓	✓
Signed Training Declaration (PDF)		✓	✓	✓
Signed Inspection Declaration (PDF)		✓	✓	✓
Complaints (Excel)	✓	✓	✓	✓
Accounting Of Funds (Excel)	✓	✓	✓	✓
Signed Accounting Of Funds (PDF)	✓	✓	✓	✓
Claim Form (Excel)	✓			
Signed Claim Form (PDF)	✓			
Signed Form STD 204 (one -time) (PDF)	✓			
Serve to Service List	✓	✓	✓	
Email to TNCAccess@cpuc.ca.gov	✓	✓	✓	✓





Step 2. Follow filing requirements

PDF/Excel Format



File Name Format



Email Subject



PDF/A Compliance



File Size



Email Body





Step 2. Follow filing requirements

Step 2.1 PDF/Excel file formatting – combine all the PDF documents into a single PDF file and keep all the Excel docs in a single Excel file

PDF documents

1. AL summary form
2. AL cover letter
3. Service list
4. WAV training declaration
5. WAV inspection declaration
6. Form std204 (One-time)
7. Claim form if necessary
8. Accounting of funds expended certification

Excel documents

- Excel data templates (count: 20)
- WAV presence & availability
 - WAV response times
 - Accounting of funds expended
 - Marketing / outreach
 - Complaints

Note: There will only be 2 file attachments with the AL filing.





Step 2. Follow filing requirements

2.2 File name format – name the 2 file attachments with these naming conventions

Original AL filing

• PDF Packet

➤ [5-Digit TCP Number] [TNC Name]
[AL Number] [Forms]

➤ e.g. 12345 XYZ AL 1 Forms

• Excel Packet

➤ [5-Digit TCP Number] [TNC Name]
[AL Number] [Data]

➤ e.g. 12345 XYZ AL 1 Data

Supplemental filing

• PDF Packet

➤ [5-Digit TCP Number] [TNC Name]
[AL # Letter] [Supplement Forms]

➤ e.g. 12345 XYZ AL 1A Supplement Forms

• Excel Packet

➤ [5-Digit TCP Number] [TNC Name]
[AL # Letter] [Supplement Data]

➤ e.g. 12345 XYZ AL 1A Supplement Data





Step 2. Follow filing requirements

2.3 PDF/A compliance – ensure that the PDF packet is PDF/A compliant

How to make PDF documents PDF/A compliant?

Adobe Acrobat

<https://helpx.adobe.com/acrobat/using/pdf-x-pdf-a-pdf.html>

Nitro

<https://www.gonitro.com/user-guide/pro/article/create-a-pdf-a-file>





Step 2. Follow filing requirements

2.4 File size – follow file size limit

Size limit

- 5 MB per email

What if file is >5 MB?

- Use CPUC's sFTP

How to use sFTP?

- Info on how to set up an account & upload files is available [here](#)

Submit AL

- [Log in here](#) if you already have an account





Step 2. Follow filing requirements

2.5 Email subject format – follow these examples for email subject

Original AL Filing

- [TNC Name] [AL #]
- e.g. XYZ AL 1

Supplement Filing

- [TNC Name] [AL # Letter] [Supplement]
- e.g. XYZ AL 1A Supplement

Note: Use the same email subject format if sending via CPUC's sFTP.





Step 2. Follow filing requirements

2.6 Email body – follow the example below

To TNCAccess@cpuc.ca.gov Bcc

Cc [Service List]

XYZ AL 1

 12345 XYZ AL1 Forms.pdf 137 KB	 12345 XYZ AL1 Data.xlsx 23 KB
---	--

To CPED and Service List:

XYZ submits this advice letter requesting offset against the quarterly Access Fee payments collected to improve wheelchair accessible vehicle service in Quarter 1 of 2020. Please find the two attached documents related to this filing.

For questions on this filing, please contact John Smith at 514-500-5000 or jsmith@xyz.com.





Step 3. Submit AL via email

3.1 Attach two files only

PDF Packet

1. AL summary form
2. AL cover letter
3. Service list
4. WAV training declaration
5. WAV inspection declaration
6. Form std204 (one-time)
7. Claim form if necessary
8. Accounting of funds expended



Excel Packet

- Excel data templates (count: 20)
- WAV presence & availability
 - WAV response times
 - accounting of funds expended
 - marketing / outreach
 - complaints

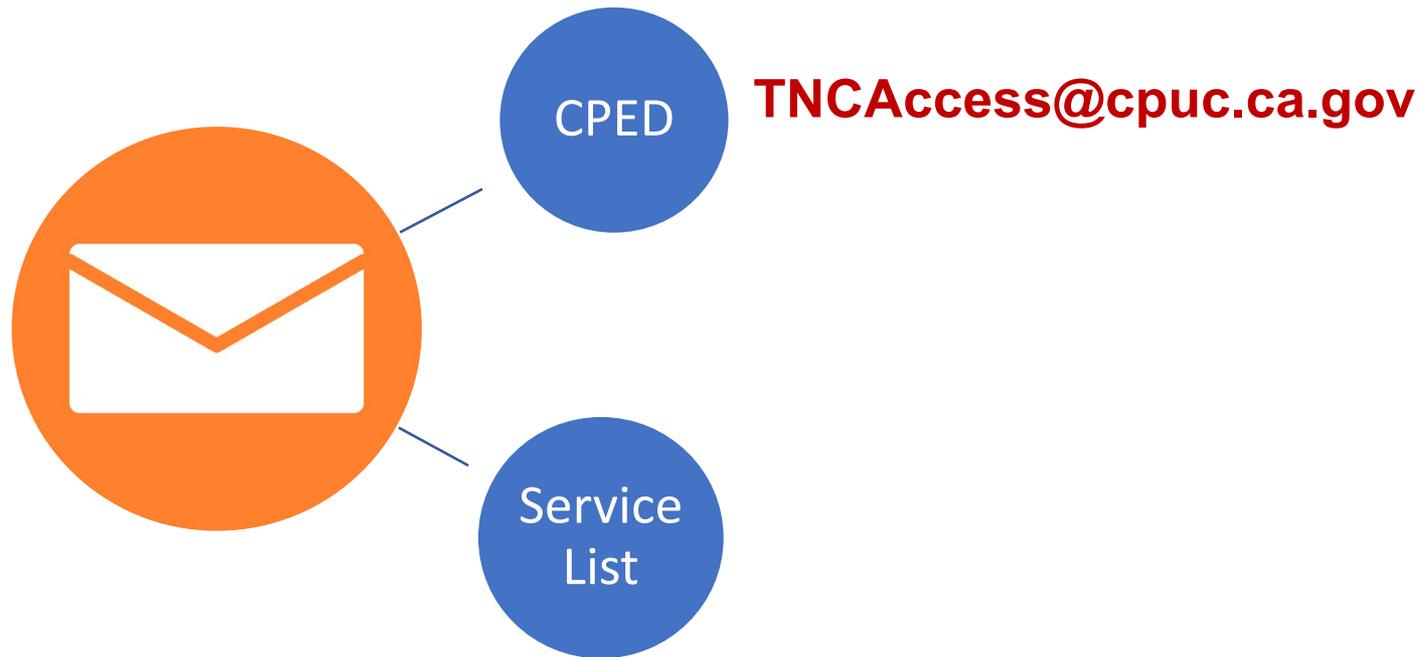
- **For a supplemental filing, the PDF packet must include only the summary form, cover letter, service list and any other PDF document.**
- **Any other supplemental document that is required to be in Excel format must be attached as such.**





Step 3. Submit AL via email

3.1 Email the original AL or supplemental filing





Step 3. Submit AL via email

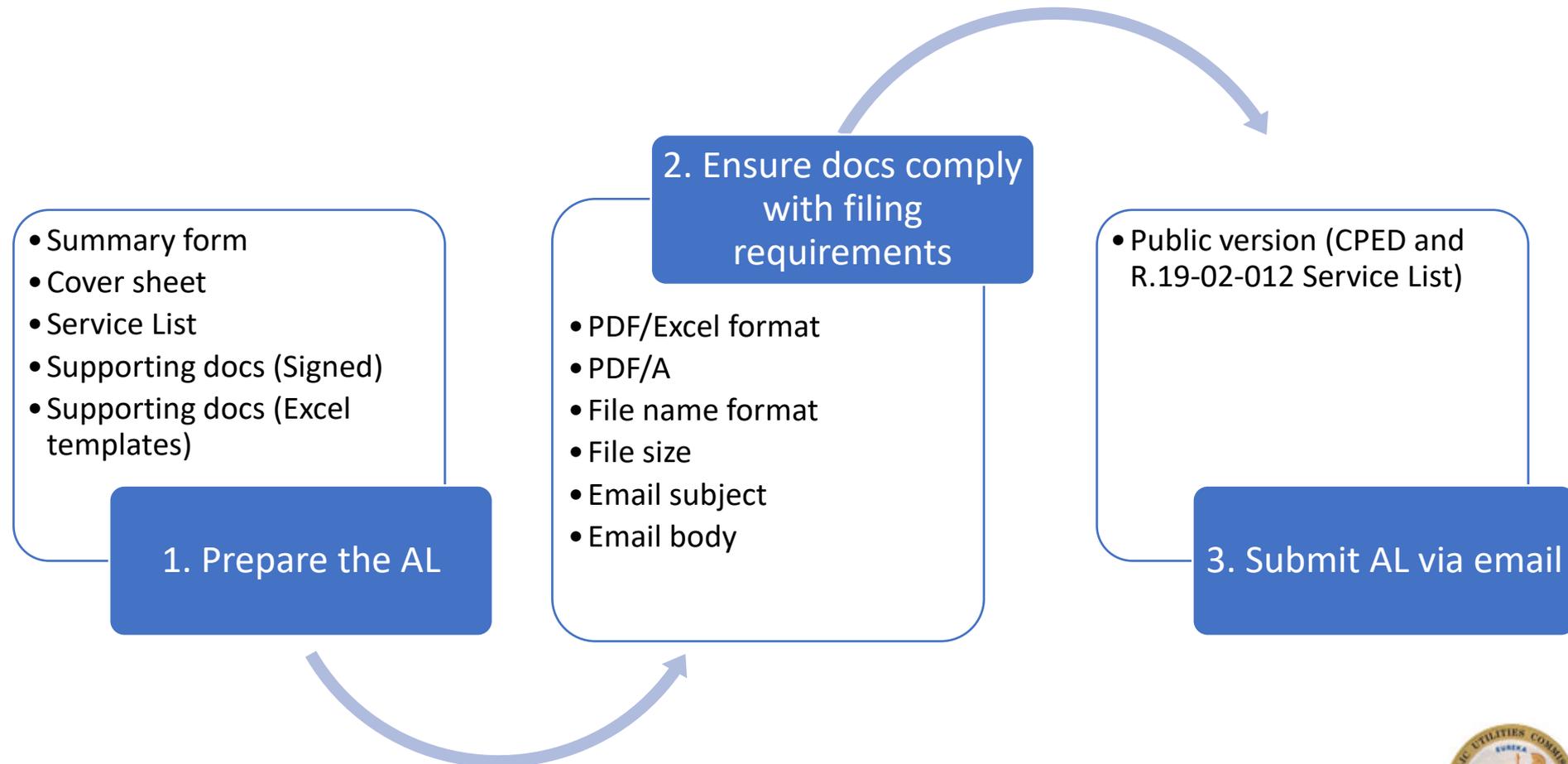
Cut off times and confirmation

- ✓ The **cut off time** to be considered filed the same day as submitted is **5:00 PM PST**.
- ✓ Filings received by the Consumer Protection and Enforcement Division (CPED) **after 5:00 PM PST** or on a **non-business** day will be considered filed the **following** business day.
- ✓ Automatic confirmation email from CPED will be sent upon receiving any AL filing.



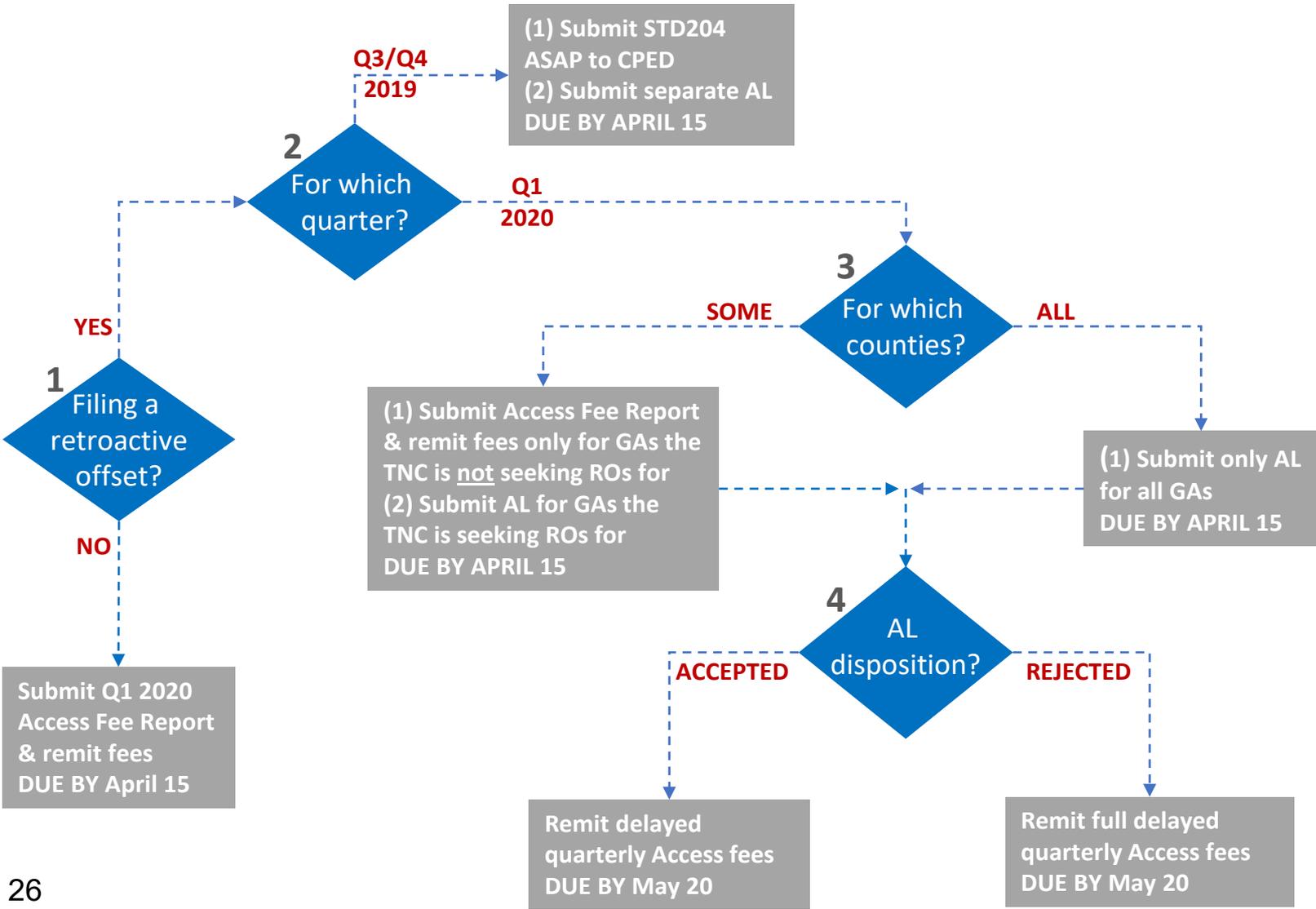


Advice Letter Process: Recap





Retroactive Offset Process





Step-by-Step Guide for Filing Protests/Responses or Replies





Step 1. Prepare the protest/response or reply

Protest/response and reply basics

- General Order 96-B (General Rule 7.4) provides the grounds and requirements for a protest/response or reply to an advice letter
- File a protest/response within 20 days of the AL's submission date
- A carrier shall reply to each protest within 5 business days after the end of the protest period
- The protestor cannot reply to the TNC's reply
- Protests/responses and replies are not required to be served on the service list





Step 1. Prepare the protest/response or reply

Key components



**Protest/response
or reply letter**



**Supporting
documents** (if any)

- ✓ Summary form and cover letter are not needed when filing a protest/response or reply
- ✓ Protest/response or reply is not required to be served on the service list per G.O. 96-B





Step 2. Follow filing requirements

PDF/Excel Format



File Name Format



Email Subject



PDF/A Compliance



File Size



Email Body





Step 2. Follow filing requirements

Step 2.1 PDF/Excel file formatting – combine the letter and any supporting documents into a single PDF file

PDF

1. Letter of protest/response or reply
2. Non-Excel supporting documents (if any)

Note: If there are supporting documents in Excel format, please save them as PDF.





Step 2. Follow filing requirements

2.2 File name format – name the 2 file attachments with these naming conventions

Protest

- **[Protest by] [Protester's Name] [TNC Name] [AL #]**
e.g. Protest by Cal Alliance XYZ AL 1

Reply

- **[Reply to] [Protester's Name] [TNC Name] [AL #]**
e.g. Reply to Cal Alliance XYZ AL 1

Response

- **[Response to] [Responder's Name] [TNC Name] [AL #]**
e.g. Response to SFMTA XYZ AL 1





Step 2. Follow filing requirements

2.3 PDF/A compliance – ensure that the PDF packet is PDF/A compliant

How to make PDF documents PDF/A compliant?

Adobe Acrobat

<https://helpx.adobe.com/acrobat/using/pdf-x-pdf-a-pdf.html>

Nitro

<https://www.gonitro.com/user-guide/pro/article/create-a-pdf-a-file>





Step 2. Follow filing requirements

2.4 File size – follow file size limit (this is less likely to become an issue for protest filings)

Size limit

- 5 MB per email

What if file is >5 MB?

- Use CPUC's sFTP

How to use sFTP?

- Info on how to set up an account & upload files is available [here](#)

Submit AL

- [Log in here](#) if you already have an account





Step 2. Follow filing requirements

2.5 Email subject format – follow these examples for email subject

Protest filing

- [Protest by] [Protester's Name] [TNC Name] [AL #]
e.g. Protest by Cal Alliance XYZ AL 1

Reply filing

- [Reply to] [Protester's Name] [TNC Name] [AL #]
e.g. Reply to Cal Alliance XYZ AL 1

Response filing

- [Response to] [Responder's Name] [TNC Name] [AL #]
e.g. Response to SFMTA XYZ AL 1

Note: Use the same email subject formats if submitting via CPUC's sFTP.





Step 2. Follow filing requirements

2.6 Email body – follow the example below

To TNCAccess@cpuc.ca.gov Bcc

Cc info@XYZ.com

Protest by Cal Alliance XYZ AL1

 Protest by Cal Alliance XYZ A...
2 MB

To CPED:

Cal Alliance submits this protest to XYZ AL 1 requesting offset against the quarterly Access Fee payments collected to improve wheelchair accessible vehicle service in Quarter 1 of 2020. Please find the attached document/s related to this filing.

For questions on this filing, please contact Elizabeth Smith at 514-500-5000 or elizabeth@calalliance.org.





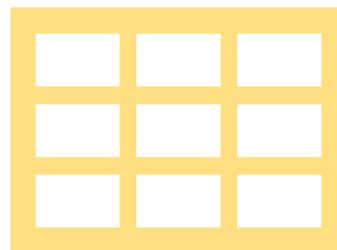
Step 3. Submit AL via email

3.1 Attach the protest/response or reply letter and any supporting docs

**Protest/response or
reply letter**



**Supporting documents
in Excel (if any)**





Step 3. Submit AL via email

3.1 Email the protest/response or reply filing



TNCAccess@cpuc.ca.gov

Protest

- CPED
- TNC

Reply

- CPED
- Protester or Responder

Response

- CPED
- TNC





Step 3. Submit AL via email

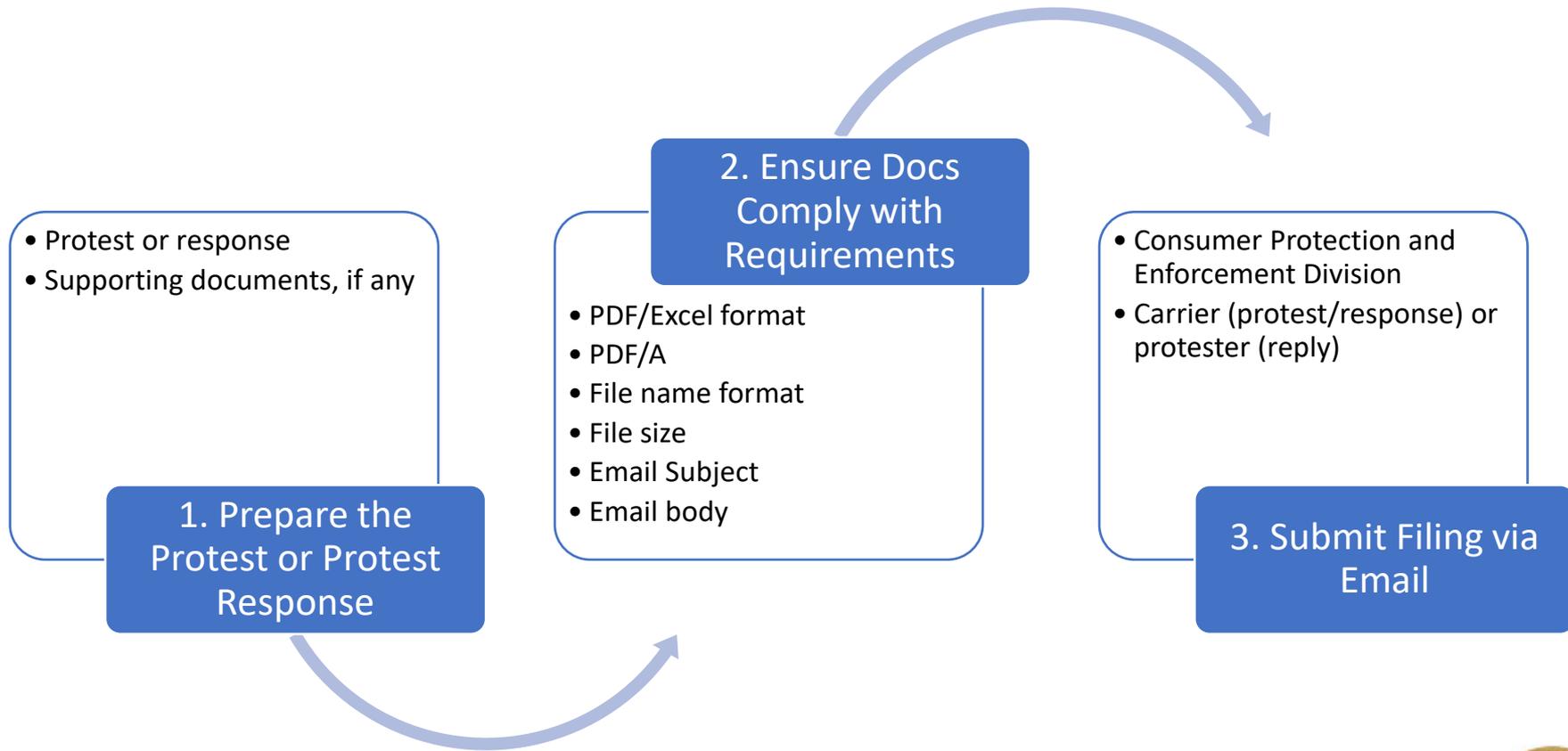
Cut off times and confirmation

- ✓ The **cut off time** to be considered filed the same day as submitted is **5:00 PM PST**.
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- ✓ Automatic confirmation email from CPED will be sent upon receiving the filing.





Protest and Reply/Response Process: Recap





Links to AL Resources

[General Order 96-B](#)

Detailed rules and requirements covering ALs

[D.20-03-007](#)

Track 2 Decision establishing Advice Letter Process for Retroactive, Offset, and Exemption.

[Advice Letter Manual and Templates](#)

Step-by-step guide in addition to templates to use when filing ALs.





Thank you!

Questions or Comments





Thank you!
For Additional Information:
www.cpuc.ca.gov
**[https://www.cpuc.ca.gov/tncaccessAL/
TNCAccess@cpuc.ca.gov](https://www.cpuc.ca.gov/tncaccessAL/TNCAccess@cpuc.ca.gov)**

