

CALIFORNIA PUBLIC UTILITIES COMMISSION
Consumer Protection and Enforcement Division
Passenger Transportation Carrier Advice Letter (AL) Summary Form

PASSENGER TRANSPORTATION CARRIER FILER INFORMATION

Date of Submission: December 30, 2025	Date AL served on parties: October 15, 2025	
Carrier Name: Uber Technologies, Inc.	PSG #: 0038150-P	
DBA Name: Uber Technologies, Inc.		
Address: 1725 3rd Street		
City: San Francisco	State: CA	ZIP Code: 94158
Filer's Name: First, Last Justine Woodland		
Filer's Email: jwoodland@uber.com		Filer's Phone: (415) 494-7405

AL INFORMATION

Advice Letter #: 37A	Requested Effective Date: November 14, 2025	AL Tier: <input type="checkbox"/> I <input checked="" type="checkbox"/> II <input type="checkbox"/> III <input type="checkbox"/> Information Only
Subject of filing: Uber Technologies, Inc.'s Advice Letter 37A		
Authorization for filing: Resolution #, Decision #, etc. D.20-03-007, D.21-03-005, D.21-11-004, and D.23-02-02		
Notes/comments: Other information & reference to advice letter, etc. Uber Technologies, Inc's Advice Letter No. 37A requesting an offset against the quarterly Access For All Fee payments collected for San Francisco County and San Mateo County.		

SUBMISSION INFORMATION

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.

Questions regarding the Access for All Program Advice Letter filings, please email:
tncaccess@cpuc.ca.gov

Questions regarding the Autonomous Vehicle Passenger Service Programs Advice Letter filings, please email:
AVPrograms@cpuc.ca.gov

Questions regarding the Clean Miles Standard Advice Letter filings, please email:
CleanMiles@cpuc.ca.gov

Questions regarding the Transportation Network Companies general Advice Letter filings, please email:
Licensing_TNC@cpuc.ca.gov



Uber Technologies, Inc.
1725 3rd Street
San Francisco, CA 94158
uber.com

December 30, 2025

Uber Technologies, Inc.

PSG0038150

Advice Letter No. 37A

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. 37A Supplement (Q3 2025)

I. Offset Request

Pursuant to Decisions (D.) 20-03-007, D.21-03-005, D.21-11-004, and D.23-02-024, Uber Technologies, Inc. (“Uber”) submits this Supplemental Advice Letter No. 37A to request to offset Quarter 3 of 2025 TNC Access For All Fund¹ fee payments by the amounts Uber spent to improve wheelchair accessible vehicle (“WAV”) service in Quarter 3 of 2025.² Consistent with Rule 7.5.1 of General Order 96-B, Uber makes no changes from Advice Letter No. 37 regarding the existing requested effective date.³

Uber submits this supplement to address a California Public Utilities Commission (“Commission”) Consumer Protection Enforcement Division (“CPED”) staff directive sent via email by Noah Thoron on December 11, 2025. In that email, CPED staff directed Uber to file a supplement to Advice Letter No. 37 (filed on October 15, 2025) to amend the response time information according to updated guidance, as reflected in Table A of this cover letter.

The offset amounts requested by county are as follows:

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

² 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.

³ The filing of an advice letter supplement does not automatically continue or reopen the protest period or delay the effective date of an advice letter. See General Order 96-B, Rule 7.5.1.

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County	Offset Expenses (\$)	Percent Allocated (%) ⁴	Offset Requested (\$)
ALAMEDA	\$ -	%	\$ -
ALPINE	\$ -	%	\$ -
AMADOR	\$ -	%	\$ -
BUTTE	\$ -	%	\$ -
CALAVERAS	\$ -	%	\$ -
COLUSA	\$ -	%	\$ -
CONTRA COSTA	\$ -	%	\$ -
DEL NORTE	\$ -	%	\$ -
EL DORADO	\$ -	%	\$ -
FRESNO	\$ -	%	\$ -
GLENN	\$ -	%	\$ -
HUMBOLDT	\$ -	%	\$ -
IMPERIAL	\$ -	%	\$ -
INYO	\$ -	%	\$ -

County	Offset Expenses (\$)	Percent Allowed (%)	Offset Requested (\$)
ORANGE	\$ -	%	\$ -
PLACER	\$ -	%	\$ -
PLUMAS	\$ -	%	\$ -
RIVERSIDE	\$ -	%	\$ -
SACRAMENTO	\$ -	%	\$ -
SAN BENITO	\$ -	%	\$ -
SAN BERNARDINO	\$ -	%	\$ -
SAN DIEGO	\$ -	%	\$ -
SAN FRANCISCO	\$573,100.90	100%	\$573,100.90
SAN JOAQUIN	\$ -	%	\$ -
SAN LUIS OBISPO	\$ -	%	\$ -
SAN MATEO	\$242,431.20	100%	\$242,431.20
SANTA BARBARA	\$ -	%	\$ -
SANTA CLARA	\$ -	%	\$ -

⁴ D.23-02-024 OP6.

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KERN	\$ -	%	\$ -
KINGS	\$ -	%	\$ -
LAKE	\$ -	%	\$ -
LASSEN	\$ -	%	\$ -
LOS ANGELES	\$ -	%	\$ -
MADERA	\$ -	%	\$ -
MARIN	\$ -	%	\$ -
MARIPOSA	\$ -	%	\$ -
MENDOCINO	\$ -	%	\$ -
MERCED	\$ -	%	\$ -
MODOC	\$ -	%	\$ -
MONO	\$ -	%	\$ -
MONTEREY	\$ -	%	\$ -
NAPA	\$ -	%	\$ -
NEVADA	\$ -	%	\$ -
Subtotal	\$ -	%	\$ -

SANTA CRUZ	\$ -	%	\$ -
SHASTA	\$ -	%	\$ -
SIERRA	\$ -	%	\$ -
SISKIYOU	\$ -	%	\$ -
SOLANO	\$ -	%	\$ -
SONOMA	\$ -	%	\$ -
STANISLAUS	\$ -	%	\$ -
SUTTER	\$ -	%	\$ -
TEHAMA	\$ -	%	\$ -
TRINITY	\$ -	%	\$ -
TULARE	\$ -	%	\$ -
TUOLUMNE	\$ -	%	\$ -
VENTURA	\$ -	%	\$ -
YOLO	\$ -	%	\$ -
YUBA	\$ -	%	\$ -
Subtotal	\$ -	%	\$ -

Total Offset Request	\$815,532.10	100%	\$815,532.10
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Per D.20-03-007, D.21-03-005, D.21-11-004, and D.23-02-024, Uber provides the following documents in support of its request as indicated in the summary table below:

Criteria	Must Demonstrate	Documentation Included (Y/N)
1. Presence and availability of on-demand and pre-scheduled⁵ WAVs⁶	(a) the number of WAVs in operation - by quarter and aggregated by hour of the day and day of the week; (b) the unique number of WAVs in operation – by quarter and by hour of the day and day of the week; and (c) 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; (d) the total WAV trips requested and completed broken out by Census Tract; and (e) operating hours for each geographic area	Y

⁵ As Uber has explained in previous submissions, Uber does not currently have a pre-scheduled WAV offering. As such, information and data tables relating to pre-scheduled trips are marked “N/A”.

⁶ D.20-03-007 Ordering Paragraph 1; D.23-02-024 Ordering Paragraph 11 and 12.

2a. Improved level of service (on-demand WAVs)⁷	<p>Both the Offset Time and the Trip Completion Standards are satisfied:</p> <p>(a)(1) Offset Time Standard & WAV Response Times⁸: 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 Standard⁹: 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>	Y
2b. Improved level of service (pre-scheduled WAVs)¹⁰	<p>Both the Pickup Delay Benchmark and the Trip Completion Standards are satisfied:</p> <p>(a) Pickup Delay Standard within the Pickup Delay Benchmark¹¹: Meet or exceed both the relevant Response Time Benchmarks for a given quarter in a given</p>	N/A

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

⁸ D.21-11-004 Ordering Paragraph 1, 2, and 3.

⁹ D.21-11-004 Ordering Paragraph 6 and 7.

¹⁰ D.23-02-024 Ordering Paragraph 1-5.

¹¹ D.23-02-024 Ordering Paragraph 4.

	<p>geographic area within the Pre-scheduled Pickup Delay Benchmarks (PDB). The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request in that quarter (see Table D)</p> <p>(b.1) Pre-scheduled Trip Completion Standard¹²: Meet or exceed the applicable minimum percentage of trip requests completed (see Table E), 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 F). The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request.</p>	
3. Efforts to publicize and promote available WAV services¹³	<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, including but not limited to:</p> <p>(a) Submitted an annual outreach plan (due no later than July 1 of each year),</p> <p>(b) Information about disability access and WAV in general marketing campaigns,</p> <p>(c) Submit a quarterly report for each offset county on the following: Progress made towards implementing the outreach plan; The number of entities contacted; The method, nature, outcome of the contact; the number of partnerships developed; Efforts to publicize and promote WAV service in each offset county and whether efforts were</p>	Y

¹² D.23-02-024 Ordering Paragraph 5.

¹³ D.20-03-007 Ordering Paragraph 9, and D.23-02-024 Ordering Paragraph 16.

	<p>accessible to people with disabilities and limited English proficiency; Educational materials developed and distributed; and outcome of TNCs efforts to outreach and engage wheelchair users.</p> <p>Quarterly Report shall also address the following questions:</p> <ol style="list-style-type: none">1. What methods of engagement did the TNC find most effective and why?2. What common concerns/questions came up during the engagement process?3. What challenges have you encountered? How do you plan to overcome them?	
4. Full accounting of funds expended¹⁴	<p>Qualifying offset expenses are:</p> <p>(a) reasonable, legitimate costs that improve a TNC's WAV service, and</p> <p>(b) incurred in the quarter for which a TNC requests an offset, and</p> <p>(c) on the list of eligible expenses attached as Appendix A, and</p> <p>(d) net of fare revenues collected from WAV service delivery in the quarter for which a TNC requests an offset¹⁵</p>	Y
5. Training and inspections¹⁶	<p>(a) certification of WAV driver training completion within the past 3 years, and</p> <p>(b) WAV driver training programs used per geographic area, and the number of WAV drivers that completed WAV training in that quarter, and</p> <p>(c) Certification of WAV inspection and approval</p>	Y

¹⁴ D.20-03-007 Ordering Paragraph 10.

¹⁵ D.21-11-004 Ordering Paragraph 9.

¹⁶ D.20-03-007 Ordering Paragraph 13 and 15(f), 15(g), and 15(h).

6. Reporting complaints¹⁷	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; Stranded Passenger, Pickup, Drop Off, and Other issues.	Y
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Table A: Level 1 and Level 2 Offset Time Standards (percent) and ORTB (minutes) by County

County	Q3 2025					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) ¹⁸	Level 2 (%)	Level 2 (mins)	
San Francisco	13	81.71	13.25	98.63	18.28	Yes
San Mateo	14	91.2	19.00	99.92	24.2	Yes

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	13	A	79.14	Yes

¹⁷ D.23-02-024 Ordering Paragraph 13.

¹⁸ Level 1 and Level 2 (mins) represent the applicable ORTB percentile for the appropriate quarter submission. Response time minutes for each decile is included in the file UBER_2025Q3_Response_Times_3.

San Mateo	14	B	74.47	Yes
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Table C: Trip Completion Standard (part b.2)

County	Option 1 or 2 ¹⁹	(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
San Francisco	1	4129	3718	4226	4226
San Mateo	1	1088	781	1193	1193

Table D: Pre-scheduled Pickup Delay Standards (PDS) (percent) and Pickup Delay Benchmarks (PDB) (minutes) by County

County	Q3 2025			TNC claims the data demonstrates meeting or exceeding % of completed trips and within PDB?
	# Quarter Submission (1 st , 2 nd , 3 rd , ...8 th)	PDS (%)	PDB (mins)	
San Francisco	N/A	N/A	N/A	N/A
San Mateo	N/A	N/A	N/A	N/A

Table E: Pre-scheduled 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?	Pre-scheduled Trip Completion Standard (%)	TNC claims the data demonstrates meeting the minimum % of trip requests completed?
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¹⁹ See D.21-11-004 Ordering Paragraph 6.

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Uber Technologies, Inc.

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San Francisco	N/A	N/A	N/A	N/A
San Mateo	N/A	N/A	N/A	N/A

Table F: Pre-scheduled Trip Completion Standard (part b.2)

County	Option 1 or 2 ²⁰	(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
San Francisco	N/A	N/A	N/A	N/A	N/A
San Mateo	N/A	N/A	N/A	N/A	

Per D.23-02-24²¹, Uber submits information on the on-demand and Pre-scheduled Service Mix as indicated in the table below.

Table G: On-demand and Pre-scheduled Service Mix

County	# of On-Demand WAV Trips	# of Pre-sched uled WAV Trips	% of On-Demand WAV trips out of the total Pre-scheduled WAV trips	% of Pre-sched uled WAV trips out of the total on-deman d WAV trips
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²⁰ See D.23-02-024 Ordering Paragraph 5.

²¹ See D.23-02-024 Ordering Paragraph 6.

San Francisco	4226	0	100	0
San Mateo	1193	0	100	0

Per D.23-02-24²², Uber submits information on Wait and Save data as indicated in the table below.

Table H: Wait and Save

County	# of WAV Wait & Save Trips	# of On-Demand WAV Trips	% of Wait & Save Trips out of the total on-demand WAV trips
San Francisco	0	4226	0
San Mateo	0	1193	0

WAV Operating Hours

Where UberWAV is available, prospective passengers can request a WAV ride through Uber’s app 24 hours a day, 7 days a week.

II. Background

In 2018, Senate Bill 1376, the “TNC Access for All Act,” was enacted by the California Legislature.²³ 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.²⁴

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

III. Accessibility at Uber

²² See D.23-02-024 Ordering Paragraph 11.

²³ S.B. 1376; *see also* Pub. Util. Code § 5440.5.

²⁴ Pub. Util. Code § 5440.5(a)(1)(B)(ii).

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 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 2025, Uber spent over **\$3.4M** on payments to third-party partners with WAVs.

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, D.21-11-004, and D.23-02-024, and the templates provided by the Commission, Uber provides the following supporting information: this Advice Letter "38150 Uber Technologies, Inc. AL 37A Forms," including Attachment A (Training and Inspections Declarations) and Attachment B (Outreach Quarterly Report); and the .csv files referenced below.

1. WAVs in Operation

Data for the WAVs in operation in Quarter 3 of 2025 is provided in the report "UBER_2025Q3_WAVS_In_Operation_1a." 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. Unique WAVs in Operation

Data for unique WAVs in operation in Quarter 3 of 2025 for every county in which Uber requests (or previously requested) an offset is provided in the report "UBER_2025Q3_Under_WAVS_In_Operation_1b." Per the template provided by the Commission, the data is aggregated by hour of the day and day of the week for each county.

3. WAV Trips

Data detailing WAV trips in Quarter 3 of 2025 for every county in which Uber requests (or previously requested) an offset is provided in the report "UBER_2025Q3_WAV_Trips_2." This

report includes data on the percentage, number, and Census Tract²⁵ of WAV trips completed, not accepted, canceled-no show,²⁶ canceled by passenger, canceled by 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.²⁷

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.

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

Data for response times for completed WAV Trips, including Periods A and B, is provided in the report “UBER_2025Q3_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_2025Q3_OTS_PDS_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 in a given county 24 hours a day, 7 days a week. Second, the fact that WAVs are

²⁵ Due to default formatting settings on .csv readers, Census Tract information may appear as a 10-digit code instead of an 11-digit code, omitting the 0 in California’s 06 state code.

²⁶ 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.”

²⁷ 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 cancellations for the day and hour of the ultimate trip event.

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, overall traffic patterns (e.g., rush hour), and business events such as onboarding of new third-party WAV service providers and implementation of 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.

5. Trip Completion Standard (TCS)

Data demonstrating that Uber has fulfilled the Trip Completion Standard is provided in the report “UBER_2025Q3_TCS_PTC5.”

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 in a given 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.

6. Outreach

Between July and September 2025 (Quarter 3 of 2025), Uber began implementing its 2025-2026 Annual Outreach Plan. Details of Uber’s efforts including 1) a narrative of its efforts, 2) a tracker documenting its quarterly efforts pursuant to its plan, 3) answers to questions set forth in D.23-02-024²⁸, and 4) exemplar marketing materials are included as Attachment B.

Additional data detailing Uber’s outreach efforts is provided in the report “UBER_2025Q3_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.

7. WAV Training and Inspections

²⁸ See D.23-02-024 Ordering Paragraph 16.

Information regarding WAV Driver Training is provided in the report “UBER_2025Q3_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.

8. Complaints

Information regarding complaints related to WAV services for each geographic area is provided in the report “UBER_2025Q3_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.

9. Accounting of Funds Expended

An accounting of certain funds expended in Quarter 3 of 2025 is included in the report “UBER_2025Q3_Funds_Expend_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, and 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.

10. Contract Information

Information regarding contracts with service providers is included in the report “UBER_2025Q3_Contract_Information_11.” The “Duration” 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 December 30, 2025. If there are any questions regarding this advice letter, please contact Ashley Fillmore 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 Ashley Fillmore 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/ Ashley Fillmore
Ashley Fillmore
Senior Counsel, Regulatory
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Attachments

1. Attachment A - Signed Training & Inspection Declarations (PDF)
2. Attachment B - Outreach Quarterly Report (PDF)
3. Data Attachments in CSV format (WAVs in Operation; Unique WAVs in Operation; WAV Trips; Response times; OTS/PDS; TCS/PTC; 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 IMLEM
FILER: CALIFORNIA PUBLIC UTILITIES COMMISSION
LIST NAME: LIST
LAST CHANGED: DECEMBER 11, 2025**

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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: 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: 10/10/2025

Andres Munoz

Print Name of Applicant/Officer

Andres Munoz

Signature of Applicant(s)

Andres Munoz

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: 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: 10/10/2025

Andres Munoz

Print Name of Applicant/Officer

Andres Munoz

Signature of Applicant(s)

Andres Munoz

Signature of Corporate Officer

Manager-COO

Title of Corporate Officer

ATTACHMENT B

ATTACHMENT B

Uber Technologies, Inc.'s Outreach Quarterly Report Quarter 3 2025

October 15, 2025

In the third quarter of 2025, Uber Technologies, Inc. continued to advance its UberWAV (Wheelchair Accessible Vehicles) program in alignment with the 2025–2026 outreach strategy and in compliance with the California Public Utilities Commission's TNC Access for All Act (SB 1376). During this quarter, Uber delivered one presentation and conducted one in-person focus group. The team engaged with 99 organizations, including follow-up outreach to 32 previously contacted groups and initial engagement with 67 new organizations.

Although activities during this period were affected by scheduling changes, an extended transition in Uber's public policy leadership, and an unexpected cancellation of a planned focus group, the team quickly pivoted and successfully met their engagement goals. Within a condensed timeline, we delivered our largest in-person focus group to date with Self-Help for the Elderly. Securing their participation required Mandarin and Cantonese translation and interpretation – presentation materials were translated on short notice, and we worked with their staff to offer live Cantonese interpretation.

Third Quarter 2025 Outreach Questions Checklist:

1. What methods of engagement did the TNC find most effective and why?

This quarter, developing a translated presentation and conducting targeted follow-up conversations were the most effective methods of engagement. We were able to extend our reach to Mandarin-speaking seniors in the community. Targeted follow-up conversations helped address initial questions in advance, supporting one-on-one engagements. This led to the distribution of our fact sheets across regional teams, which generated positive feedback. It was noted that more members accessed the service partly due to the fact sheets, which provided step-by-step instructional guidance.

2. What common concerns/questions came up during the engagement process?

Below are some of the common questions and concerns raised during Q3 outreach engagements regarding the UberWAV program:

- How can UberWAV be integrated within Uber Health accounts?

- How can Uber for Business admins and coordinators use Central or Uber Health to request WAV or Assist vehicle options for riders with disabilities and mobility challenges?
- What is the current service availability of WAV in Southern and Northern California?
- How much longer does it take to order an UberWAV than an UberX?
- Is there a designated phone number to order WAV service?

3. What challenges have you encountered? How do you plan to overcome them?

A key challenge during this period involved addressing language accessibility needs within a short timeline. Following the last-minute cancellation of a planned engagement, we quickly pivoted to organize our largest in-person focus group to date with Self-Help for the Elderly, whose participants are primarily monolingual Cantonese speakers. To ensure effective communication, we translated presentation materials on short notice and worked with their staff to provide Cantonese interpretation. Moving forward, we plan to use translated presentation materials to expand outreach with similar communities.

Key outreach activities in the third quarter of 2025 included:

- **Stakeholder Engagement:** This quarter, outreach efforts included disability service providers, rehabilitation facilities, disability program facilitators, college disability offices, support groups, and community-based organizations that assist individuals with mobility and access needs. A presentation was delivered to Arosa Care and an in-person focus group session was conducted for Self Help for the Elderly – the largest to date, with 57 participants.
- **Outreach Efforts:** We engaged with 99 organizations this quarter, including 67 new contacts and 32 follow-up interactions with previously connected groups.
- **Follow-Up Strategy:** Phone calls continued to be the primary method for follow-up, allowing for direct, timely conversations.
- **Post-Engagement Initiatives:** Following presentations and meetings, outreach continued to explore additional connections and identify new organizations for future engagement.

Speaking Engagements

Organization Name	Key Themes	Engagement Type
Arosa Care	<ul style="list-style-type: none">• Ease of scheduling WAV rides for seniors and caregivers• Integrating UberWAV within Uber Health Accounts• Reliability of WAV availability for medical appointments• Cost considerations and program fees for WAV rides• Communication of ride details to seniors and families• Support for mobility devices (walkers, scooters, oxygen equipment)• Assistance from drivers for seniors with limited mobility	Presentation
Self-Help for the Elderly	<ul style="list-style-type: none">• Affordability of WAV rides compared to standard UberX service• Ability to book an Uber ride by phone• Wait times for UberWAV compared to UberX	Focus Group

Program Information and Community Group Outreach

The outreach team has established a network of over 350 stakeholders across California who receive regular program updates, provide feedback, and help spread the word about UberWAV. During presentation opportunities, Uber utilizes its UberWAV presentation deck to engage with stakeholder groups and educate them about the program. The deck provides an introductory overview of UberWAV, highlighting its features and benefits. It also includes detailed instructions on how to use UberWAV, with step-by-step guidance on booking a ride and what to expect during the ride. The presentation emphasizes the intent of State Bill 1376, which requires transportation network companies to adopt wheelchair-accessible vehicles on their platforms, highlighting the significance of the UberWAV program and Uber's commitment to improving accessibility and inclusivity for riders with disabilities. (See Section A).

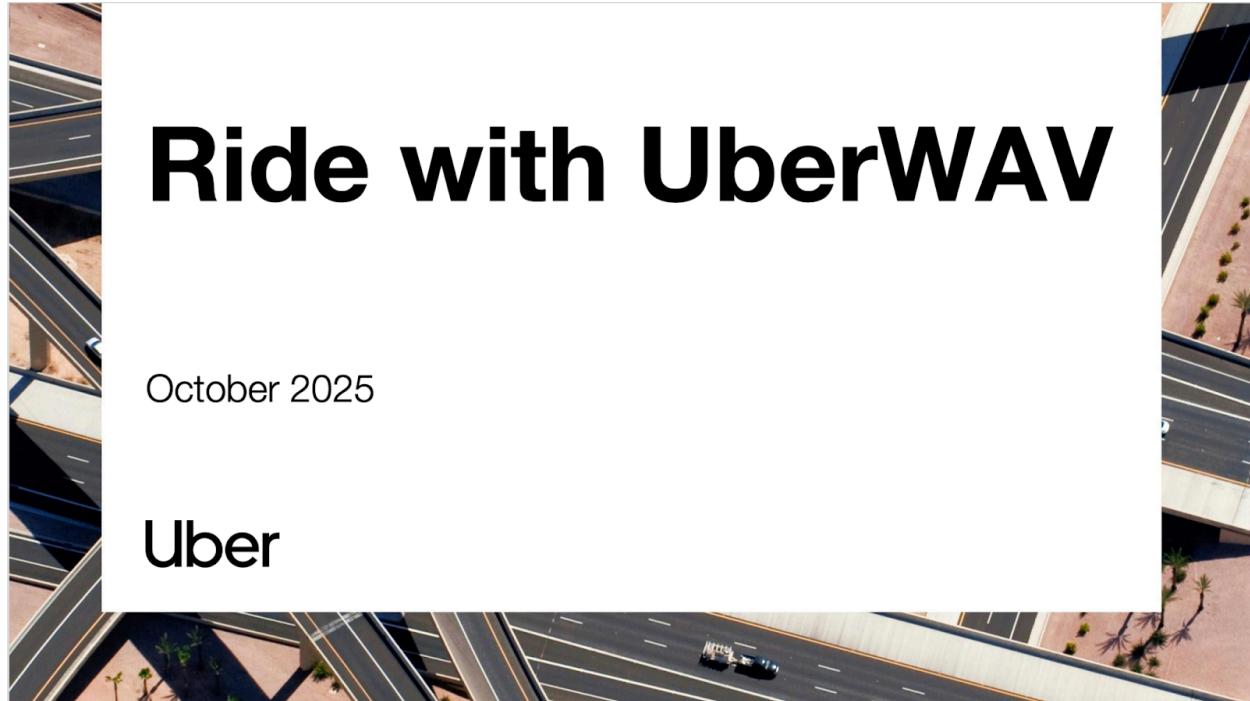
To identify outreach opportunities that effectively reach disabled consumers, Uber has actively sought input from these stakeholders. To support these efforts, Uber has provided a California-specific instructional fact sheet on accessing UberWAV to stakeholder organizations

and has prepared English, Spanish, and Mandarin versions of the sheet for distribution. (See Section B).

In addition to these resources, Uber has created a dedicated webpage for UberWAV and an accessibility webpage that provides regular updates on new products, features, and initiatives aimed at improving the mobility and independence of riders with disabilities. These digital resources are available in four languages and include Frequently Asked Questions, tools for consumers, and a step-by-step explanation of how to use the service. The user-friendly design provides a comprehensive guide to using UberWAV, highlighting Uber's commitment to improving accessibility for all riders. (See Section C). Additionally, Uber has undertaken marketing efforts to expand awareness of UberWAV offerings, such as by including UberWAV in our general mass marketing email campaigns (see Section D).

Finally, to help summarize Uber's various efforts throughout the quarter, Uber is attaching a chart showing its progress towards its quarterly goals established in its outreach plan. (See Section E).

Section A: Ride with UberWAV Community Presentation



October 2025

Uber

Intros

Danielle Lam

Public Policy and Communications Lead (California)

danielle.lam@uber.com

WAV-group@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 Features + Options



For riders who are blind or low vision



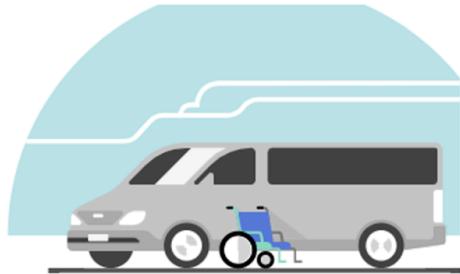
For riders who are deaf or hard-of-hearing



For riders using folding wheelchairs, motorized wheelchairs & scooters

What is WAV?

UberWAV provides affordable rides in wheelchair-accessible vehicles (WAV). In certain cities, riders who use motorized wheelchairs or scooters can request a ride in a WAV. WAV driver-partners are certified by a third party in safely driving and assisting people with disabilities.



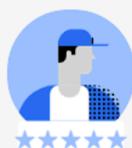
Fast, reliable rides

When and where WAV is available, rides are requested on demand, and work around your life, not the other way around.



Trips that fit your budget

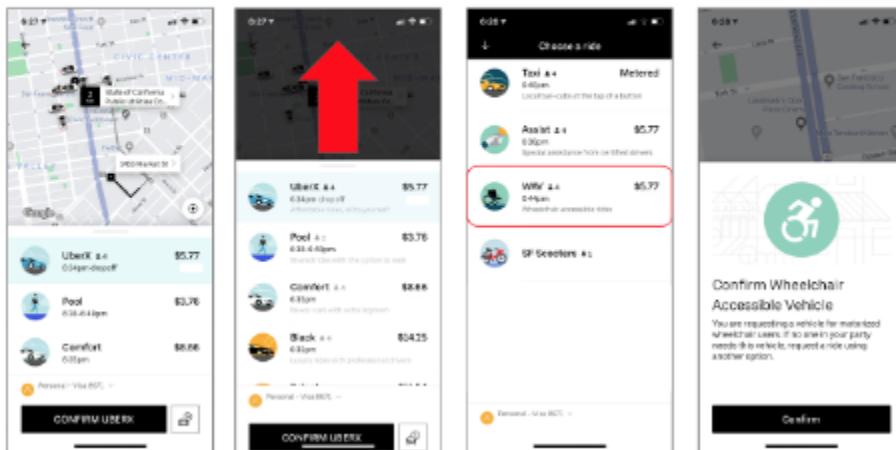
The price of a WAV ride is similar to an uberX trip, our basic ride option.



Specialized drivers to assist you

Every WAV driver has completed a certification course offered by a third party to help you enter and exit the vehicle.

How to ride with WAV



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

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))

Q&A

Thank you

Danielle Lam (danielle.lam@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



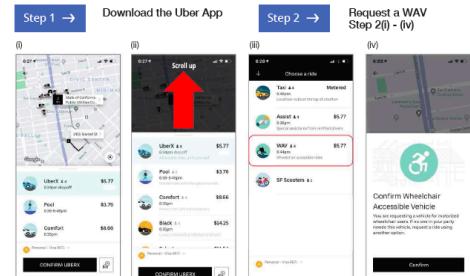
Actualmente habilitado para personas con sillas de ruedas motorizadas y scooters en el Condado Los Ángeles y en el área de la Bahía de San Francisco: los condados de San Francisco, Alameda, Contra Costa, Santa Clara, San Mateo, Marin, Sonoma, Solano, Napa y Santa Cruz.

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



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.

在优步应用中访问 Uber WAV

在南加州和旧金山湾区的部分地区，乘客现可通过优步应用搭乘无障碍车辆

Uber

如何搭乘 Uber WAV

第1步 → 下载优步应用
(<https://ubr.to/2wpc9W5>)

第2步 → 预约 Uber WAV
第2步 i) - (iv)

(i) (ii) (iii) (iv)

经济实惠的无障碍车辆按需接载服务

快速灵活的接载服务
在提供 Uber WAV 服务的
时间和地点按需叫车
只需输入目的地，然后轻触叫车按钮即可。

与您的预算相符的行程
Uber WAV 行程的收费与优
选轿车行程相同。
专业司机为您提供帮助
Uber WAV 司机需要完成由第
三方提供的轮椅安全认证程
程。

关注 UberWAV

什么是 UberWAV？ 网站和常见问题 (uber.com/ride/uberwave)
优步首席执行官关于改善无障碍服务的信
(<https://ubr.to/uberwave>)

Uber ऐप में Uber WAV को एक्सेस करना

देशीय कैलिफोर्निया और सेंट्रल फ्रायमिल्स के एरिया के कुछ हिस्सों में अब Uber ऐप
के ज़रिए कूलीलेपर सुलभ गाइडिंग उपलब्ध हैं

Uber

Uber WAV के साथ राइड कैसे ले

स्टेप 1 → Uber ऐप डाउनलोड करें
(<https://ubr.to/2wpc9W5>)

स्टेप 2 → अपने लिए Uber WAV राइड की रिकवर करें
स्टेप 2(i) - (iv)

(i) (ii) (iii) (iv)

देशीय गाइडिंग में किसायती, मौग पर उपलब्ध राइड

तेज़, तुलचयक राइड
Uber WAV द्वारा जैसी भी जगह
जानकारी है, जैसी कि यह की विवरण भी
जानकारी है, जैसी कि यह की विवरण भी
जैसी कि यह की विवरण भी।

आपके वर्क में यह होने
वाली है।
Uber WAV यहाँ का विवरण,
Uber WAV के विवरण होते हैं।

आपकी यह जगह के लिए
लिखी जाती है कि यहाँ
Uber WAV यहाँ का विवरण,
Uber WAV के विवरण होते हैं।

Uber WAV को कॉलॉ करें

Uber WAV क्या है? वेबसाइट और भ्रमण यूपर जाने वाले साथाल
(uber.com/ride/uberwave)
समस्या यारों को बेटार बातों के लिये मैं हमारे CEO का सदैर
(<https://ubr.to/uberwave>)

Truy cập WAV trong ứng dụng Uber

Hiện bạn đã có thể đặt xe thuận tiện cho người đi xe lăn thông
qua ứng dụng Uber ở một số khu vực miền Nam California và
khu vực Vịnh San Francisco

Uber

Cách đặt xe WAV

Bước 1 → Tải ứng dụng Uber
(<https://ubr.to/2wpc9W5>)

Bước 2 → Đặt xe WAV
Bước 2(i) - (iv)

(i) (ii) (iii) (iv)

Chuyển xe nhanh chóng,
linh hoạt
Khi và tại nơi có xe
WAV, bạn có thể đặt xe
trong ứng dụng Uber
chỉ cần nhập điểm đến và
chạm để yêu cầu.

Các chuyến đi hợp túi tiền
Chuyển xe Uber có giá bằng
hỗ trợ bạn

Tài xế chuyển trả
Tài xế WAV hoàn thành khóa
hỗ trợ bạn

Theo dõi UberWAV

UberWAV là gì? Trang web và Câu hỏi thường gặp
(uber.com/ride/uberwave)
Thư từ CEO về việc Cải thiện dịch vụ hỗ trợ người khuyết tật
(<https://ubr.to/uberwave>)

Section C: UberWAV Public Information Materials - Webpage

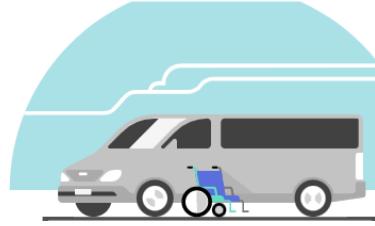


WAV

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](#)



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.*



Section D: UberWAV Public Information Materials - Emails

Uber

Ride on your time

Ready to get on the road again? We have trip options available on demand for when you're on the go.

[Request a trip →](#)



Rides with you in mind

Discover new ways to travel with Uber—check out the range of options available in the app.

Certain products and features are not available in all markets. Check your Uber app for the latest availability.

UberXL
 Need room for an extra friend or luggage? Ride with UberXL.

Uber Comfort
 Treat yourself to extra leg room on a personalized ride

Uber Black
 Business meeting or big night out? Get dropped off in luxury

Uber WAV
 Need a wheelchair accessible vehicle? Select Uber WAV

[Try now >](#)

TCP 38150-P and TCP 38150-A

[Help Center](#) [Privacy](#)
[Terms](#) [Community](#)
[Unsubscribe](#) [Email Preferences](#)

This is a promotional email from Uber Technologies
1515 3rd St., San Francisco, CA 94158
Uber.com

[f](#) [X](#) [@](#)

Section E: UberWAV Progress Toward Quarterly Goals

A	B	C
	Objective / Quarter	Q3 2025
1.1	Conduct initial email outreach to at least 60 stakeholder groups per quarter	Email Outreach: 99 SGs contacted Presentation Outreach: 2 SGs contacted (including one focus group)
1.2	Conduct at least 1 tailored follow-up meeting with responsive stakeholder groups per quarter (4 per year), highlighting UberWAV's features and addressing any specific questions from stakeholders or organizations.	<input checked="" type="checkbox"/>
1.3	Collect continuous feedback from stakeholder groups and riders in digital and virtual forms of engagement (via in-app support for riders, Uber's custom feedback form, email input).	<input checked="" type="checkbox"/>
2.1	Collaborate with local organizations on at least 1 joint outreach initiative per quarter (4 per year).	<input checked="" type="checkbox"/>
2.2	Conduct at least 1 focus group or listening session per quarter (4 per year) with representatives from non-traditional disability communities.	<input checked="" type="checkbox"/>
2.3	Engage at least 1 consultant specializing in stakeholder outreach and participation annually to optimize Uber's interaction strategies.	<input checked="" type="checkbox"/>
3.1	Provide multilingual materials in five primary languages (English, Spanish, Mandarin-Chinese, Hindi, and Vietnamese) to disability advocacy groups in multi-ethnic communities where English is not the predominant language.	Yes: Uber has prepared materials in English, Spanish, Mandarin Chinese, Hindi and Vietnamese for distribution.
3.2	Launch at least one mass email campaign per month highlighting UberWAV (with aim to reach at least 40,000 riders per quarter)	43,482 rider emails sent this quarter
3.3	Publish at least two pieces of social media content per year promoting UberWAV (with aim to reach at least 100,000 impressions per post)	In Progress
3.4	Partner/Collaborate with a wheelchair user or social media influencer once per year to raise awareness of UberWAV	In Progress
4	Monitoring and Evaluation	<input checked="" type="checkbox"/>
Deliverable	<p>1. What methods of engagement did the TNC find most effective and why?</p> <p>2. What common concerns/questions came up during the engagement process?</p> <p>3. What challenges have you encountered? How do you plan to overcome them?</p>	<p>Translated presentations and targeted follow-up conversations were the most effective engagement methods. Translating materials expanded outreach to Mandarin-speaking seniors, and follow-ups helped address basic questions early on. Key themes of questions included: UberWAV integration with UberHealth accounts; Uber Business Admin user guidance; WAV availability in Southern and Northern California; WAV costs compared to UberX; and WAV response times.</p> <p>A key challenge was meeting language accessibility needs on short notice. After a last-minute cancellation, we organized our largest focus group with Self-Help for the Elderly, providing translated materials and Cantonese interpretation. We'll continue using these materials to reach similar communities.</p>