

**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.  
1455 Market Street  
San Francisco, CA 94103  
uber.com

April 15, 2020  
Uber Technologies, Inc.  
PSG0038150  
Advice Letter No. 2

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

*Re: Uber Technologies, Inc. - Advice Letter No. 2*

**I. Purpose**

Pursuant to Decision (D.) 20-03-007, Uber Technologies, Inc. (Uber) submits this Advice Letter No. 2 to request to retroactively offset, against previous quarterly Access Fund payments paid, by the amounts spent by Uber to improve wheelchair accessible vehicle (WAV) service in Quarter 4 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 (\$)
ALAMEDA	\$ 405,213.50
ALPINE	\$ -
AMADOR	\$ -
BUTTE	\$ -
CALAVERAS	\$ -
COLUSA	\$ -
CONTRA COSTA	\$ 73,533.91
DEL NORTE	\$ -

County	Expenditures (\$)
ORANGE	\$ 52,226.96
PLACER	\$ -
PLUMAS	\$ -
RIVERSIDE	\$ 4,743.84
SACRAMENTO	\$ 395.01
SAN BENITO	\$ -
SAN BERNARDINO	\$ -
SAN DIEGO	\$ -

<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>	\$ 1,565,422.98
<b>MADERA</b>	\$ -
<b>MARIN</b>	\$ 1,185.04
<b>MARIPOSA</b>	\$ -
<b>MENDOCINO</b>	\$ -
<b>MERCED</b>	\$ -
<b>MODOC</b>	\$ -
<b>MONO</b>	\$ -
<b>MONTEREY</b>	\$ 395.01
<b>NAPA</b>	\$ -
<b>NEVADA</b>	\$ -

**Subtotal** \$ 2,045,750.44

<b>SAN FRANCISCO</b>	\$ 234,795.70
<b>SAN JOAQUIN</b>	\$ 3,952.16
<b>SAN LUIS OBISPO</b>	\$ -
<b>SAN MATEO</b>	\$ 140,916.14
<b>SANTA BARBARA</b>	\$ -
<b>SANTA CLARA</b>	\$ 314,659.22
<b>SANTA CRUZ</b>	\$ -
<b>SHASTA</b>	\$ -
<b>SIERRA</b>	\$ -
<b>SISKIYOU</b>	\$ -
<b>SOLANO</b>	\$ 790.02
<b>SONOMA</b>	\$ -
<b>STANISLAUS</b>	\$ -
<b>SUTTER</b>	\$ -
<b>TEHAMA</b>	\$ -
<b>TRINITY</b>	\$ -
<b>TULARE</b>	\$ -
<b>TUOLUMNE</b>	\$ -
<b>VENTURA</b>	\$ 1,355.39
<b>YOLO</b>	\$ -
<b>YUBA</b>	\$ -

**Subtotal** \$ 753,834.44

**Total Offset** \$ 2,799,584.88

## II. Background

In 2018, Senate Bill (SB) 1376, the “TNC Access for All Act,” was enacted by the California Legislature.<sup>1</sup> Public Utilities (Pub. Util.) Code § 5440.5 establishes a framework wherein Transportation Network Companies (TNCs) are permitted to offset against quarterly Access Fund payments for amounts spent by the TNC during the quarter to improve WAV service.<sup>2</sup>

Uber recognizes its unique position as a TNC to enable increased access to third-party WAVs<sup>3</sup> available for request via its online-enabled application, and appreciates the opportunity to submit this retroactive offset request advice letter.

## III. Accessibility at Uber

As the first TNC in California to address WAV challenges on a wide-spread 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.

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

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 isn’t 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

---

<sup>1</sup> S.B. 1376 (“SB 1376”), Cal. Legis. Serv. Ch. 701 (2018).; Pub. Util. Code § 5440.5.

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

<sup>3</sup> Pub. Util. Code § 5431.5(b). (“Wheelchair accessible vehicle” or ‘WAV’ means a vehicle equipped with a ramp or lift capable of transporting nonfolding motorized wheelchairs, mobility scooters, or other mobility devices.”).

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.

While 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 individuals 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.

Thus, Uber has invested significant capital to increase access to WAV service throughout California by partnering with third-party WAV providers. For example, in Quarter 4 of 2019 Uber spent <<Begin Confidential>> [REDACTED] <<End Confidential>> 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, and to support this program as it grows and scales. Uber requests the Commission evaluate the supporting documentation provided in light of the amount spent to enable WAV service.

Uber has partnered with MV Transportation, Inc. (MV Transportation), a national transportation provider, to enable their fleet of drivers and WAV vehicles to be available for request via the Uber app. MV Transportation is a leader in providing specialized on-demand accessible transportation for people with disabilities and seniors, serving over 110 million passengers each year across 30 U.S. states and Canada. All WAVs added to the Uber platform by MV Transportation are owned by MV Transportation and operated by their drivers, all of whom have been trained in safe wheelchair securement.

Uber continues to explore 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 provides the following supporting information in accordance with the templates provided by the Commission on April 3, 2020: "38150 Uber Technologies, Inc. AL 2 Data" and

Attachments A - B. The supporting documents represent information required pursuant to D.20-03-007 and a Confidentiality Declaration.

**1. Number of WAVs in Operation**

Data on the number of WAVs in operation throughout California, in Quarter 4 of 2019, 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. As demonstrated by the data, each month drivers are providing thousands of hours of WAV service throughout California. Uber continues to invest to increase the presence and availability of WAVs through strategic partnerships and incentives.

**2. Number and Percentage of WAV Trips**

Data provided on the number and percentage of WAV trips throughout California, in Quarter 4 of 2019, 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 variances in the data may appear exaggerated, and true improvement may be difficult to assess. Additionally, the number and percentage of WAV trips can be impacted by the geographical 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.

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

Data provided for response times for completed WAV Trips by Decile, including Periods A and

B, is provided in the tab “Retroactive Response Time Final.”

Uber urges the Commission to take into consideration numerous factors when evaluating response times. For instance, in this specific Advice Letter request, there is no prior data to compare response times to, so response times in this instance should be considered a baseline. The fact that WAVs are servicing trips in a reasonable time should weigh considerably in the evaluation. In future quarters, improved service levels can be demonstrated by sustaining response times and expanding service through an increasing number of WAV trips, or providing service in previously unserved or underserved counties. Expanding service areas may increase overall response times as riders further away from dense urban cores are able to receive service. We caution the Commission against only using response time improvements to measure success, as progressively shorter response times may disincentivize expansion of WAV service to these unserved or underserved communities.

Additionally, improvements to service levels can be interpreted in a multitude of ways, beyond pure response times. Reduced numbers of complaints may indicate that service is improving. Steady response times during periods of increased WAV availability and trips may also indicate improvements in service. At the same time, response times may vary due to factors such as seasonality, local or widespread emergencies (e.g., the COVID-19 (Novel Coronavirus) pandemic), overall traffic patterns (e.g., rush hour), and implementation of any new outreach and service efforts. It is difficult to evaluate trends during this nascent stage of the WAV program. Given the very low demand, trip numbers and minimal amounts of data available in the early stages of this program variances in the data may appear exaggerated, and true improvement may be difficult to assess

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. The benchmarks used to evaluate response times can affect what appears as “reasonable,” for instance, San Francisco and Santa Clara counties’ response times exceed future benchmarks (for Q2 2020 per D.20-03-007).

Regarding the benchmarks set in relation to the retroactive offsets at issue here, data provided in the Commission-issued templates shows that in Los Angeles county the presence and availability of WAVs on the Uber platform has increased from Quarter 3, 2019, to Quarter 4, 2019, and Quarter 1, 2020. Response times are also improving, but when metrics such as “completion rate” are decreasing, a multitude of factors should be considered, such as: Los Angeles traffic patterns, and/or the size and spread of the county. Although there are a relatively low number of overall WAV trip requests in Los Angeles county, the broad geographic distribution of WAV requests across such a large service area makes it challenging for drivers to cover the full service area and service all of the trips.

#### **4. Evidence of Outreach Efforts**

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

Uber began several outreach efforts prior to the official start date of Quarter 3, due to the establishment of a WAV program prior to that date. Materials are provided herein for Commission review.

#### **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 funds expended in Quarter 4 of 2019 is included in the tab “Funds Expended,” along with a certification sheet in tab “Funds Expended Certification.”

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 strives to keep WAV trips priced the same as a similar UberX trip. In order to do that, Uber must offer substantial incentives to drivers to make it financially viable for them to operate their WAVs on the Uber platform, given the substantially higher acquisition, operating and maintenance costs these drivers incur. To provide for those incentives and support the WAV program, Uber makes significant investments, as represented in columns Q-BD within the “Funds Expended” template. The amount Uber is investing on a per-trip basis is substantially more than the revenues generated from WAV trips. Simply, the millions of dollars Uber has demonstrated it invests, is purely to achieve an end goal of enabling access to more WAVs.

#### **7. Certification of WAV Driver Training**

Pursuant to D.20-03-007, this certification is not required for a retroactive offset advice letter.

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

Pursuant to D.20-03-007, this information is not required for a retroactive offset advice letter.



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

Pursuant to D.20-03-007, this certification is not required for a retroactive offset advice letter.

**IV. Confidentiality**

Uber requests that its confidential information contained within this Advice Letter and supporting data worksheets within “38150 Uber Technologies, Inc. AL 2 Data” be kept confidential pursuant to the attached Declaration of Confidentiality (Attachment A), General Order 96-B, Section 10.3. Accordingly, Uber requests this information be kept confidential and that it be notified if any party seeks disclosure of this confidential information from the Commission.

\* \* \* \* \*

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 Shivani Sidhar at [westregs@uber.com](mailto: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 Shivani Sidhar 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,

**Shivani Sidhar**  
Senior Counsel, Regulatory  
Uber Technologies, Inc.

Attachments

## ATTACHMENT A

### DECLARATION OF CONFIDENTIALITY PURSUANT TO GENERAL ORDER 96-B, SECTION 10.3(a-h) ON BEHALF OF UBER TECHNOLOGIES, INC. REGARDING ADVICE LETTER 2

1. I, Shivani Sidhar, in accordance with the requirements set forth in General Order 96-B, Section 10.3 (a-h), am submitting this declaration to assert that portions of the information contained in Uber Technologies, Inc.'s ("Uber") Advice Letter 2 and the below listed supporting documents (together, "Advice Letter 2 Submission") are confidential and should not be subject to public disclosure.
2. Uber's Advice Letter 2 Submission is being submitted by Uber to the California Public Utilities Commission ("CPUC") on April 15, 2020, pursuant to D.20-03-007. Confidential portions of Uber's Advice Letter 2 Submission are as follows:
  - a. **Advice Letter 2 Cover Letter**
    - i. The redacted portion of the Advice Letter 2 cover letter includes the cost of payments to third-party partners with WAVs. This figure is highly confidential and is both proprietary and commercially sensitive information that, if released by the Commission, could give Uber's competitors<sup>1</sup> an unfair business advantage. This figure identifies Uber's payments to third-party partners with WAVs in California for the fourth quarter of 2019. This figure is confidential pursuant to the California Public Records Act ("CPRA") under Gov't. Code § 6254(k), which protects "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law..." from public disclosure.<sup>2</sup> The redacted figure represents pricing data and commercially sensitive information which is proprietary and not intended for public disclosure. Public disclosure would pose potential negative impacts and/or harm to Uber's WAV partners.

---

<sup>1</sup> Competitors include all other transportation network companies (TNCs); whether operating in California and/or globally.

<sup>2</sup> See e.g., *Valley Bank of Nev. v. Superior Court*, 15 Cal.3d 652, 658 (1975) (financial information is protected - especially of non-parties).

b. **“38150 Uber Technologies, Inc. AL 2 Data” Worksheets**

- i. **“WAVs in Operation”**: Data including the number of WAVs in operation is confidential business sensitive information, the disclosure of which would reveal valuable information about product demand and operational capacity. This data contains economically valuable information which is not generally known to the public.<sup>3</sup> Disclosure of this data may inhibit competition, and is thus against public interest.<sup>4</sup> Competitors may be able to use this data to determine supply, demand, insight into resources, and gain an unfair competitive advantage.<sup>5</sup> This information is to be treated confidential by law, as stated by California Public Records Act (“CPRA”) under Gov’t. Code § 6254(k), which protects “[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law...” from public disclosure.
- ii. **“WAV Trips Completed”**: Data including the number of WAV trips completed is confidential business sensitive information, the disclosure of which would reveal valuable information about product demand and operational capacity. This data is also sensitive from a user privacy perspective because due to the low volume this data might be used to identify individual riders and drivers. This data contains economically valuable information which is not generally known to the public.<sup>6</sup> Disclosure of this data may inhibit competition, and is thus against public

---

<sup>3</sup> See, e.g., *Lion Raisins Inc. v. USDA*, 354 F.3d 1072, 1080–81 (9th Cir 2004) (where information collected by agency would allow competitor to “infer critical information about its competitors’ volume, market share, and marketing strategy,” agency appropriately refused to produce in response to Freedom of Information Act request).

<sup>4</sup> See e.g., *United States v. Columbia Pictures Indus., Inc.*, 507 F. Supp. 412, 434 (S.D.N.Y. (1980) (“Far more important than the interests of either the defendants or the existing industry . . . is the public’s interest in . . . the preservation of competition.”).

<sup>5</sup> See e.g., *Morlife, Inc. v. Perry*, 56 Cal. App. 4th 1514, 1520 (1997) (acknowledging that “preservation of our free market economic system is the concomitant right to have the ingenuity and industry one invests in the success of the business or occupation protected from the gratuitous use of that “sweat-of-the-brow” by others”).

<sup>6</sup> See, e.g., *Lion Raisins Inc. v. USDA*, 354 F.3d 1072, 1080–81 (9th Cir 2004) (where information collected by agency would allow competitor to “infer critical information about its competitors’ volume, market share, and marketing strategy,” agency appropriately refused to produce in response to Freedom of Information Act request).

interest.<sup>7</sup> Competitors may be able to use this data to determine supply and demand and gain an unfair competitive advantage.<sup>8</sup> This information is to be treated confidential by law, as stated by California Public Records Act (“CPRA”) under Gov’t. Code § 6254(k), which protects “[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law...” from public disclosure.

- iii. **“WAV Trips Not Accepted”:** Data including the number of WAV trips not accepted is confidential business sensitive information, the disclosure of which would reveal valuable information about product demand and operational capacity. This data is also sensitive from a user privacy perspective because due to the low volume this data might be used to identify individual riders and drivers. This data contains economically valuable information which is not generally known to the public.<sup>9</sup> Disclosure of this data may inhibit competition, and is thus against public interest.<sup>10</sup> Competitors may be able to use this data to determine supply and demand and gain an unfair competitive advantage.<sup>11</sup> This information is to be treated confidential by law, as stated by California Public Records Act (“CPRA”) under Gov’t. Code § 6254(k), which protects “[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law...” from public disclosure.

---

<sup>7</sup> See e.g., *United States v. Columbia Pictures Indus., Inc.*, 507 F. Supp. 412, 434 (S.D.N.Y. (1980) (“Far more important than the interests of either the defendants or the existing industry . . . is the public's interest in . . . the preservation of competition.”).

<sup>8</sup> See e.g., *Morlife, Inc. v. Perry*, 56 Cal. App. 4th 1514, 1520 (1997) (acknowledging that “preservation of our free market economic system is the concomitant right to have the ingenuity and industry one invests in the success of the business or occupation protected from the gratuitous use of that “sweat-of-the-brow” by others”).

<sup>9</sup> See, e.g., *Lion Raisins Inc. v. USDA*, 354 F.3d 1072, 1080–81 (9th Cir 2004) (where information collected by agency would allow competitor to “infer critical information about its competitors’ volume, market share, and marketing strategy,” agency appropriately refused to produce in response to Freedom of Information Act request).

<sup>10</sup> See e.g., *United States v. Columbia Pictures Indus., Inc.*, 507 F. Supp. 412, 434 (S.D.N.Y. (1980) (“Far more important than the interests of either the defendants or the existing industry . . . is the public's interest in . . . the preservation of competition.”).

<sup>11</sup> See e.g., *Morlife, Inc. v. Perry*, 56 Cal. App. 4th 1514, 1520 (1997) (acknowledging that “preservation of our free market economic system is the concomitant right to have the ingenuity and industry one invests in the success of the business or occupation protected from the gratuitous use of that “sweat-of-the-brow” by others”).

- iv. **“WAV Trips Cancelled Passenger”**: Data including the number of WAV trips cancelled by passengers is confidential business sensitive information, the disclosure of which would reveal valuable information about product demand and operational capacity. This data is also sensitive from a user privacy perspective because due to the low volume this data might be used to identify individual riders and drivers. This data contains economically valuable information which is not generally known to the public.<sup>12</sup> Disclosure of this data may inhibit competition, and is thus against public interest.<sup>13</sup> Competitors may be able to use this data to determine supply and demand and gain an unfair competitive advantage.<sup>14</sup> This information is to be treated confidential by law, as stated by California Public Records Act (“CPRA”) under Gov’t. Code § 6254(k), which protects “[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law...” from public disclosure.
- v. **“WAV Trips Cancelled by Driver”**: Data including the number of WAV trips cancelled by drivers is confidential business sensitive information, the disclosure of which would reveal valuable information about product demand and operational capacity. This data is also sensitive from a user privacy perspective because due to the low volume this data might be used to identify individual riders and drivers. This data contains economically valuable information which is not generally known to the public.<sup>15</sup>

---

<sup>12</sup> See, e.g., *Lion Raisins Inc. v. USDA*, 354 F.3d 1072, 1080–81 (9th Cir 2004) (where information collected by agency would allow competitor to “infer critical information about its competitors’ volume, market share, and marketing strategy,” agency appropriately refused to produce in response to Freedom of Information Act request.).

<sup>13</sup> See e.g., *United States v. Columbia Pictures Indus., Inc.*, 507 F. Supp. 412, 434 (S.D.N.Y. (1980) (“Far more important than the interests of either the defendants or the existing industry . . . is the public’s interest in . . . the preservation of competition.”).

<sup>14</sup> See e.g., *Morlife, Inc. v. Perry*, 56 Cal. App. 4th 1514, 1520 (1997) (acknowledging that “preservation of our free market economic system is the concomitant right to have the ingenuity and industry one invests in the success of the business or occupation protected from the gratuitous use of that “sweat-of-the-brow” by others”).

<sup>15</sup> See, e.g., *Lion Raisins Inc. v. USDA*, 354 F.3d 1072, 1080–81 (9th Cir 2004) (where information collected by agency would allow competitor to “infer critical information about its competitors’ volume, market share, and marketing strategy,” agency appropriately refused to produce in response to Freedom of Information Act request.).

Disclosure of this data may inhibit competition, and is thus against public interest.<sup>16</sup> Competitors may be able to use this data to determine supply and demand and gain an unfair competitive advantage.<sup>17</sup> This information is to be treated confidential by law, as stated by California Public Records Act (“CPRA”) under Gov’t. Code § 6254(k), which protects “[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law...” from public disclosure.

- vi. **“Retroactive Response Time Final”**: Data produced in relation to response times is confidential business sensitive information, the disclosure of which would reveal valuable information about product demand and operational capacity. This data contains economically valuable information which is not generally known to the public.<sup>18</sup> Disclosure of this data may inhibit competition, and is thus against public interest.<sup>19</sup> Company findings are commercially-developed information that are proprietary, competitively-sensitive, and highly valuable to Uber and competitors. Competitors may be able to use this data to determine supply and demand and gain an unfair competitive advantage.<sup>20</sup> Disclosure of which would inhibit competition, and thus weigh against the public’s interest. Furthermore, this data is considered highly sensitive business information that could be used to potentially predict future business

---

<sup>16</sup> See e.g., *United States v. Columbia Pictures Indus., Inc.*, 507 F. Supp. 412, 434 (S.D.N.Y. (1980) (“Far more important than the interests of either the defendants or the existing industry . . . is the public's interest in . . . the preservation of competition.”).

<sup>17</sup> See e.g., *Morlife, Inc. v. Perry*, 56 Cal. App. 4th 1514, 1520 (1997) (acknowledging that “preservation of our free market economic system is the concomitant right to have the ingenuity and industry one invests in the success of the business or occupation protected from the gratuitous use of that “sweat-of-the-brow” by others”).

<sup>18</sup> See e.g., *Lion Raisins Inc. v. USDA*, 354 F.3d 1072, 1080–81 (9th Cir 2004) (where information collected by agency would allow competitor to “infer critical information about its competitors’ volume, market share, and marketing strategy,” agency appropriately refused to produce in response to Freedom of Information Act request).

<sup>19</sup> See e.g., *United States v. Columbia Pictures Indus., Inc.*, 507 F. Supp. 412, 434 (S.D.N.Y. (1980) (“Far more important than the interests of either the defendants or the existing industry . . . is the public's interest in . . . the preservation of competition.”).

<sup>20</sup> See e.g., *Morlife, Inc. v. Perry*, 56 Cal. App. 4th 1514, 1520 (1997) (acknowledging that “preservation of our free market economic system is the concomitant right to have the ingenuity and industry one invests in the success of the business or occupation protected from the gratuitous use of that “sweat-of-the-brow” by others”).

models and/or products. Thus is protected by, Government Code Section 6254(k); Cal. Evid. Code § 1060; and Cal. Civ. Code § 3426.1(d) (Uniform Trade Secrets Act).

- vii. **“Funds Expended”**: The redacted figures show the amounts, broken down by cost category, that Uber has invested to increase access to WAV service throughout California during or before Quarter 4 of 2019. The figures contained herein are highly confidential and contain trade secrets, proprietary and commercially sensitive information that, if released by the Commission, could give Uber’s competitors an unfair business advantage. These figures identify the granularity of Uber’s expenditure amounts which would allow competitors and potential competitors to understand Uber’s operational capacity and could be used to target business opportunities that negatively impact Uber. These figures are confidential trade secrets pursuant to 18 U.S.C. § 1832 and Cal. Civil Code § 3426 et seq., thus prohibited from public disclosure in conformance with Government Code Section 6254(k). Further, the data contained within this spreadsheet is economically valuable information that is not generally known to the public and particularly valuable during early stage development of a program.<sup>21</sup> Disclosure would give competitors a “free ride” on investments, resources, expenses and efforts. Uber has expended significant capital to develop a first-of-its kind WAV program including, but not limited to, establishing the technology, logic, and systems to suit this nascent WAV program.
- viii. **“Funds Expended Certification”**: This Certification shows the amounts, broken down by cost category, that Uber has invested to increase access to WAV service throughout California during or before the Quarter 4 of 2019. The figures contained herein are highly confidential and contain trade secrets, proprietary and commercially sensitive information that, if released by the Commission, could give Uber’s competitors an unfair

---

<sup>21</sup> See e.g., *Lion Raisins Inc. v. USDA*, 354 F.3d 1072, 1080–81 (9th Cir 2004) (where information collected by agency would allow competitor to “infer critical information about its competitors’ volume, market share, and marketing strategy,” agency appropriately refused to produce in response to Freedom of Information Act request).



business advantage. These figures identify the granularity of Uber's expenditure amounts which would allow competitors and potential competitors to understand Uber's operational capacity and could be used to target business opportunities that negatively impact Uber. These figures are confidential trade secrets pursuant to 18 U.S.C. § 1832 and Cal. Civil Code § 3426 et seq., thus prohibited from public disclosure in conformance with Government Code Section 6254(k). Further, the data contained within this spreadsheet is economically valuable information that is not generally known to the public and particularly valuable during early stage development of a program.<sup>22</sup> Disclosure would give competitors a "free ride" on investments, resources, expenses and efforts. Uber has expended significant capital to develop a first-of-its kind WAV program including, but not limited to, establishing the technology, logic, and systems to suit this nascent WAV program.

3. Additionally information within the Worksheets named in Section b of the Advice Letter 2 Submission reveals proprietary internal formulas, methods, salaries, techniques, investments, and tools. Uber contributed and invested extensive time, effort, and resources into developing its WAV program and has taken all reasonable efforts to maintain the secrecy of Uber-specific processes and tools. Therefore, this information is also protected by Cal. Evid. Code § 1060 ("the owner of a trade secret has a privilege to refuse to disclose the secret, and to prevent another from disclosing it"). Cal. Evid. Code § 1060 is incorporated into the CPRA via Gov't. Code § 6254(k), which protects "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege" from public disclosure.
4. To the extent possible, portions of the supporting documentation have been marked confidential through a stamped header.
5. Given the nascent stage of Uber's WAV program and the accompanying risks associated with intentional or unintentional disclosure of proprietary information, the information referenced herein should be held confidential for an indefinite period of time.
6. Portions of the Advice Letter 2 Submission are redacted and labeled "CONFIDENTIAL" and Uber asks that they be treated as such. As required under General Order 96-B, Section

---

<sup>22</sup>*Id*

10.3(a)(iii), the un-redacted information contained in the Advice Letter 2 Submission will be made available to those who execute a nondisclosure agreement. As required under General Order 96-B, Section 10.3(a)(iv), persons to contact regarding the potential release of information by the Commission are as follows: (1) Lisa Tse (regulatory@uber.com and ltse@uber.com); (2) Shivani Sidhar (ssidhar@uber.com); or (3) Jane Lee (jylee@uber.com).

Respectfully submitted,

**Shivani Sidhar**

Senior Counsel, Regulatory  
Uber Technologies, Inc.



California  
Public Utilities  
Commission



[CPUC Home](#)

## CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

---

**PROCEEDING: R1902012 - CPUC - OIR TO IMPLEM**  
**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](#)

---

### Parties

---

ALEX LAVOI  
 NOMAD TRANSIT LLC DBA VIA  
 10 CROSBY 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  
 FOR: LOS ANGELES COUNTY METROPOLITAN  
 TRANSPORTATION AUTHORITY

AUTUMN M. ELLIOTT  
 SR COUNSEL  
 DISABILITY RIGHTS CALIFORNIA  
 350 SOUTH BIXEL STREET, STE 290  
 LOS ANGELES, CA 90017  
 FOR: DISABILITY RIGHTS CALIFORNIA

WHITNEY LEWIS  
 MVN 2 LLC  
 1048 MARINE AVE APT 10  
 GARDENA, CA 90247  
 FOR: MVN 2 LLC

LAYLA SOTTO  
 EXECUTIVE RIDE LLC  
 4532 W IMPERIAL HWY  
 HAWTHORNE, CA 90304  
 FOR: EXECUTIVE RIDE LLC DBA OPOLI

ANDRE COLAIACE  
 ACCESS SERVICES  
 PO BOX 5728  
 EL MONTE, CA 91734-1738  
 FOR: ACCESS SERVICES

ROBYN WAPNER  
 SR. GOV'T RELATIONS ANALYST  
 SAN DIEGO ASSOCIATION OF GOVERNMENTS  
 401 B STREET, SUITE 800  
 SAN DIEGO, CA 92101

MARK POTTER  
 ALTRUISTIC INC DBA BOUNCE  
 9845 ERMA ROAD, STE. 300  
 SAN DIEGO, CA 92131  
 FOR: ALTRUISTIC INC. DBA BOUNCE

FOR: SAN DIEGO ASSOCIATION OF  
GOVERNMENTS

NANCY WHELAN  
GEN. MGR.  
MARIN TRANSIT  
711 GRAND AVENUE, STE.110  
SAN RAFAEL, CA 94000  
FOR: MARIN TRANSIT

JOHN I. KENNEDY  
DEPUTY CITY ATTORNEY  
CITY OF SAN FRANCISCO  
SF CITY ATTORNEY'S OFFICE  
1390 MARKET STREET, 7TH FL. FOX PLAZA  
SAN FRANCISCO, CA 94102  
FOR: SAN FRANCISCO MUNICIPAL  
TRANSPORTATION AGENCY (SFMTA)

ANNA UHLS  
ATTORNEY  
RASIER-CA, LLC  
1455 MARKET STREET  
SAN FRANCISCO, CA 94103  
FOR: RASIER-CA, LLC DBA UBER  
TECHNOLOGIES INC.

NICOLE BOHN  
DIRECTOR  
SF MAYOR'S OFFICE ON DISABILITY  
1155 MARKET STREET 1ST FLOOR  
SAN FRANCISCO, CA 94103  
FOR: SAN FRANCISCO MAYOR'S OFFICE OF  
DISABILITY

TILLY CHANG  
EXECUTIVE DIRECTOR  
SAN FRANCISCO COUNTY TRANSPORTATION AUTH  
1455 MARKET STREET, 22ND FLOOR  
SAN FRANCISCO, CA 94103  
FOR: SAN FRANCISCO TRANSPORTATION  
AUTHORITY

DRENNEN SHELTON  
PLANNER  
BAY AREA METRO CENTER  
375 BEALE STREET, STE.800  
SAN FRANCISCO, CA 94105  
FOR: METROPOLITAN TRANSPORTATION  
COMMISSION (MTC)

BRETT COLLINS  
DIR - LEGAL, REGULATORY COMPLIANCE  
LYFT, INC.  
185 BERRY STREET  
SAN FRANCISCO, CA 94107  
FOR: LYFT INC.

CHRISTOF BAUMBACH  
CEO  
WINGZ, INC.  
795 FOLSOM STREET  
SAN FRANCISCO, CA 94107  
FOR: WINGZ, INC.

SARA SCHAER  
DOLIGHTFUL, INC  
31 WINFIELD ST  
SAN FRANCISCO, CA 94110  
FOR: DOLIGHTFUL, INC.

JEFF MALTZ  
CEO  
SILVERRIDE, LLC  
425 DIVISADERO ST., SUITE 201  
SAN FRANCISCO, CA 94117  
FOR: SILVERRIDE, LLC

MARK GRUBERG  
MEMBER OF EXE. BOARD  
S. F. TAXI WORKERS ALLIANCE  
1415 PALOU AVE.  
SAN FRANCISCO, CA 94124  
FOR: SAN FRANCISCO TAXI WORKERS  
ALLIANCE (SFTWA)

RITU NARAYAN  
ZUM SERVICES, INC.  
555 TWIN DOLPHINE DR STE 350  
REDWOOD CITY, CA 94401  
FOR: ZUM SERVICES, INC.

DARYL HALLS  
EXE. DIR.  
SOLANO TRANSPORTATION AUTHORITY  
ONE HARBOR CENTER, STE. 130  
SUISUN CITY, CA 94585  
FOR: SOLANO TRANSPORTATION AUTHORITY

MARILYN GOLDEN  
SR POLICY ANALYST  
DISABILITY RIGHTS EDU. & DEFENSE FUND  
3075 ADELINE STREET, STE. 210  
BERKELEY, CA 94703  
FOR: DISABILITY RIGHTS EDUCATION &  
DEFENSE FUND (DREDF)

MELISSA W. KASNITZ  
LEGAL DIR  
CENTER FOR ACCESSIBLE TECHNOLOGY  
3075 ADELINE STREET, STE. 220  
BERKELEY, CA 94703  
FOR: CENTER FOR ACCESSIBLE TECHNOLOGY

ABHAY JAIN  
ACTIVE SCALER INC., DBA TAGSI  
1551 MCCARTHY BLVD., STE. 10  
MILPITAS, CA 95035  
FOR: ACTIVE SCALER INC., DBA TAGSI

## Information Only

ABIGAIL COCHRAN  
UNIVERSITY OF CALIFORNIA, BERKELEY

ANNA FERRO  
DAVIS WRIGHT TREMAINE LLP

4/15/2020

CPUC - Service Lists - R1902012

EMAIL ONLY  
EMAIL ONLY, CA 00000

EMAIL ONLY  
EMAIL ONLY, CA 00000

ANNETTE WILLIAMS  
SF MUNICIPAL TRANSPORTATION AGENCY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

APARNA PALADUGU  
ZOOX  
EMAIL ONLY  
EMAIL ONLY, AA 00000

AUSTIN HEYWORTH  
UBER  
EMAIL ONLY  
EMAIL ONLY, CA 00000

ERIN MCAULIFF  
SF MUNICIPAL TRANSPORTATION AGENCY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

HENRY CLAYPOOL  
CONSULTANT - TECH POLICY  
AMERICAN ASSN OF PEOPLE WITH DISABILITIES  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JAMES ANDREW  
MANAGER, TRANSPORTATION PLANNING  
LA METROPOLITAN TRANSPORTATION AUTHORITY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JOHN BOWIE  
KEARNS & WEST, INC.  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JOHN ROWLEY  
PRIME TIME SERVICES  
EMAIL ONLY  
EMAIL ONLY, CA 00000

KATHLEEN CORTEZ  
PROGRAM ANALYST - AREA AGENCY ON AGING  
COUNTY OF SONOMA  
HUMAN SERVICES DEPT  
EMAIL ONLY  
EMAIL ONLY, CA 00000

LAURA TIMOTHY  
MGR - ACCESS, PARATRANSIT  
S.F. BAY AREA RAPID TRANSIT DISTRICT  
EMAIL ONLY  
EMAIL ONLY, CA 00000

LEUWAM TESFAI  
EXE. DIV.  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

MALLORY NESTOR-BRUSH  
MGR - ACCESSIBLE SERVICES  
AC TRANSIT  
EMAIL ONLY  
EMAIL ONLY, CA 00000

NEELA PAYKEL  
DEPUTY GENERAL COUNSEL  
EMAIL ONLY  
EMAIL ONLY, CA 00000

PAT PIRAS  
EMAIL ONLY  
EMAIL ONLY, CA 00000

PAUL S. BRANSON  
CEO  
LAKE LINKS  
EMAIL ONLY  
EMAIL ONLY, CA 00000

RICHARD SKAFF  
EXECUTIVE DIRECTOR  
DESIGNING ACCESSIBLE COMMUNITIES  
EMAIL ONLY  
EMAIL ONLY, CA 00000

ROSS GREEN  
ASSOCIATE  
KEARNS & WEST, INC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

STEVEN T. WALLAUCH  
PLATINUM ADVISORS  
EMAIL ONLY  
EMAIL ONLY, CA 00000

THYME CURTIS  
EXECUTIVE DIRECTOR  
THE CITY OF SAN DIEGO  
EMAIL ONLY  
EMAIL ONLY, CA 00000

TRACI LEE  
SENIOR PUBLIC POLICY MANAGER  
LYFT  
EMAIL ONLY  
EMAIL ONLY, CA 00000

TRISH KRAJNIAK  
HOPSKIPDRIVE, INC.  
EMAIL ONLY  
EMAIL ONLY, CA 00000

CAMERON-DANIEL, P.C.  
EMAIL ONLY  
EMAIL ONLY, CA 00000

DAVIS WRIGHT TREMAINE LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000

NOMAD TRANSIT LLC DBA VIA  
10 CROSBY STREET, 2ND FL.  
NEW YORK, NY 10013

CAITLIN BRADY  
 LEGALOPERATIONS ASSOCIATE  
 VIA TRANSPORTATION  
 95 MORTON ST., 3RD FL.  
 NEW YORK, NY 10014

JAMES C. BEH  
 JONES DAY  
 51 LOUISIANA AVENUE, N.W.  
 WASHINGTON, DC 20001  
 FOR: INSTITUTIONAL EQUITY INVESTORS

PATRICK T. METZ  
 JONES DAY  
 51 LOUISIANA AVENUE, N.W.  
 WASHINGTON, DC 20001  
 FOR: INSTITUTIONAL EQUITY INVESTORS

ANDREI GREENAWALT  
 PUBLIC POLICY  
 NOMAD TRANSIT, LLC  
 2233 WISCONSIN AVE., STE 201  
 WASHINGTON, DC 20007

IZZY AALA  
 CABCONNECT, INC.  
 714 E. MONUMENT AVE, SUITE 107  
 DAYTON, OH 45402

ASHAD HAMIDEH, PH.D  
 SR. DIR. - PLANNING & DEVELOPMENT  
 L.A. COUNTY METRO TRANSPORT.AUTHORITY  
 ONE GATEWAY PLAZA, MS 99-23-3  
 LOS ANGELES, CA 90012

JAMES ANDREW  
 MGR - PLANNING  
 L.A. COUNTY METRO TRANSPORT AUTHORITY  
 ONE GATEWAY PLAZA, MS 99-23-3  
 LOS ANGELES, CA 90012

JAMES O. JOHNSTON  
 JONES DAY  
 555 SOUTH FLOWER ST, FIFTIETH FL.  
 LOS ANGELES, CA 90071  
 FOR: INSTITUTIONAL EQUITY INVESTORS

PARMINDER JOEA  
 EXECUTIVE RIDE LLC  
 4532 W IMPERIAL HWY  
 HAWTHORNE, CA 90304  
 FOR: EXECUTIVE RIDE LLC DBA OPOLI

MEAGAN SCHMIDT  
 OPERATIONS MANAGER  
 FACT  
 600 MISSION AVENUE  
 OCEANSIDE, CA 92054

ROBERT GEBO  
 ADA PARATRANSIT PROGRAM ADMINISTRATOR  
 NORTH COUNTY TRANSIT DISTRICT  
 810 MISSION AVENUE  
 OCEANSIDE, CA 92054

JACK CHRISTENSEN  
 GRANTS ADMINISTRATOR  
 SANDAG  
 401 B STREET, STE. 800  
 SAN DIEGO, CA 92101

AMY KALIVAS  
 DIRECTOR OF PROGRAMS  
 ACCESS TO INDEPENDENCE  
 8885 RIO SAN DIEGO DRIVE NO 131  
 SAN DIEGO, CA 92108

ALLISON DRUTCHAS  
 WAYMO LLC  
 1600 AMPHITHEATRE PARKWAY  
 MOUNTAIN VIEW, CA 94043

GEORGE IVANOV  
 WAYMO LLC  
 100 MAYFIELD AVENUE  
 MOUNTAIN VIEW, CA 94043

MARI DAVIDSON  
 ATTORNEY AT LAW  
 WAYMO LLC  
 100 MAYFIELD AVENUE  
 MOUNTAIN VIEW, CA 94043

VIVEK GARG  
 ZUM SERVICES, INC.  
 555 TWIN DOLPHINE DRIVE, STE. 350  
 REDWOOD CITY, CA 94065

JULIE VEIT  
 DEPUTY CITY ATTORNEY  
 S. F. CITY ATTORNEY'S OFFICE  
 1390 MARKET STREET, 7TH FL.  
 SAN FRANCISCO, CA 94102  
 FOR: SAN FRANCISCO MUNICIPAL  
 TRANSPORTATION AGENCY (SFMTA)

SUSAN CLEVELAND-KNOWLES  
 GEN. COUNSEL / DEPUTY CITY ATTY.  
 OFFICE OF THE CITY ATTORNEY  
 1390 MARKET STREET, 7TH . FOX PLAZA  
 SAN FRANCISCO, CA 94102  
 FOR: SAN FRANCISCO MUNICIPAL  
 TRANSPORTATION AGENCY (SFMTA)

ANDREW DUGOWSON  
 CALIF PUBLIC UTILITIES COMMISSION  
 TRANSPORTATION ENFORCEMENT BRANCH  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

ANNA JEW  
 CALIF PUBLIC UTILITIES COMMISSION  
 TRANSPORTATION ENFORCEMENT BRANCH  
 AREA 3-D

BRIAN KAHR  
 CALIF PUBLIC UTILITIES COMMISSION  
 TRANSPORTATION ENFORCEMENT BRANCH  
 AREA 2-F

4/15/2020

CPUC - Service Lists - R1902012

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CODY NAYLOR  
CALIF PUBLIC UTILITIES COMMISSION  
TRANSPORTATION ENFORCEMENT BRANCH  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DEBBIE CHIV  
CALIF PUBLIC UTILITIES COMMISSION  
ADMINISTRATIVE LAW JUDGE DIVISION  
ROOM 5011  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

IRYNA KWASNY  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4107  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JEFF KASMAR  
CALIF PUBLIC UTILITIES COMMISSION  
TRANSPORTATION ENFORCEMENT BRANCH  
ROOM 2253  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MICHAEL LUO  
CALIF PUBLIC UTILITIES COMMISSION  
TRANSPORTATION ENFORCEMENT BRANCH  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MONICA PALMEIRA  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 3-90  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

NIKI BAWA  
CALIF PUBLIC UTILITIES COMMISSION  
TRANSPORTATION ENFORCEMENT BRANCH  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ROBERT MASON  
CALIF PUBLIC UTILITIES COMMISSION  
ADMINISTRATIVE LAW JUDGE DIVISION  
ROOM 5016  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SYCHE CAI  
CALIF PUBLIC UTILITIES COMMISSION  
TRANSPORTATION ENFORCEMENT BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

TERENCE SHIA  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSIONER SHIROMA  
ROOM 5306  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ELIZABETH YATES  
UBER TECHNOLOGIES, INC.  
1455 MARKET STREET, 4TH FL.  
SAN FRANCISCO, CA 94103

JADIE WASILCO  
SR. ANALYST, GOV'T AFFAIRS DIVISION  
SF MUNICIPAL TRANSPORTATION AGENCY  
1 SOUTH VAN NESS AVENUE, 8TH FLOOR  
SAN FRANCISCO, CA 94103

JANE Y. LEE  
ATTORNEY  
UBER TECHNOLOGIES, INC.  
1455 MARKET STREET, 4TH FL.  
SAN FRANCISCO, CA 94103

KATE TORAN  
INT. DIR.- TAXIS & ACCESSIBLE SVCS DIV.  
S. F. MUNICIPAL TRANSPORTATION AGENCY  
1 SOUTH VAN NESS AVE., 7TH FLOOR  
SAN FRANCISCO, CA 94103

LAURA GRAY  
COMMUNITY & GOVN'T RELATIONS MGR.  
CRUISE AUTOMATION  
1201 BRYANT STREET  
SAN FRANCISCO, CA 94103

LISA TSE  
ATTORNEY  
RASIER-CA, LLC  
1455 MARKET STREET  
SAN FRANCISCO, CA 94103  
FOR: RASIER-CA, LLC DBA UBER

SHIVANI SIDHAR  
COUNSEL, REGULATORY  
UBER TECHNOLOGIES, INC.  
1455 MARKET STREET, 4TH FL.  
SAN FRANCISCO, CA 94103

STEPHANIE KUHLMAN  
PARALEGAL, REGULATORY  
UBER TECHNOLOGIES, INC.  
1455 MARKET STREET, 4TH FL.  
SAN FRANCISCO, CA 94103

VALERIE COLEMAN  
PROGRAM ANALYST  
SF DEPT OF AGING & ADULT SERVICES  
1650 MISSION ST., 5TH FLR  
SAN FRANCISCO, CA 94103

JOSH RAPOPORT  
MORGAN LEWIS & BOCKIUS, LLP  
ONE MARKET, SPEAR STREET TOWER  
SAN FRANCISCO, CA 94105

PEJMAN MOSHFEGH  
ATTORNEY AT LAW  
MORGAN, LEWIS & BOCKIUS LLP  
ONE MARKET, SPEAR STREET TOWER  
SAN FRANCISCO, CA 94105

F. JACKSON STODDARD  
ATTORNEY  
MORGAN LEWIS & BOCKIUS, LLP  
ONE MARKET, SPEAR STREET TOWER  
SAN FRANCISCO, CA 94105-1126

ANNETTE TRAN  
COUNSEL - REGULATORY COMPLIANCE  
LYFT, INC.  
185 BERRY STREET  
SAN FRANCISCO, CA 94107

MARGARET TOBIAS  
ATTORNEY AT LAW  
TOBIAS LAW OFFICE  
460 PENNSYLVANIA AVE  
SAN FRANCISCO, CA 94107

ELIZABETH GALLAGHER  
LYFT INC.  
2300 HARRISON STREET  
SAN FRANCISCO, CA 94110  
FOR: LYFT INC.

DOLIGHTFUL INC. DBA KANGO  
31 WINFIELD STREET  
SAN FRANCISCO, CA 94110

DANIEL ROCKEY  
PARTNER  
BRYAN CAVE LEIGHTON PAISNER LLP  
THREE EMBARCADERO CENTER, 7TH FLOOR  
SAN FRANCISCO, CA 94111

I SULTAN  
ASSOCIATE  
DAVIS WRIGHT TREMAINE LLP  
505 MONTGOMERY STREET, STE. 800  
SAN FRANCISCO, CA 94111

VIDHYA PRABHAKARAN  
ATTORNEY  
DAVIS WRIGHT TREMAINE LLP  
505 MONTGOMERY ST., STE. 800  
SAN FRANCISCO, CA 94111-6533

RACHELLE CHONG  
COUNSEL  
LAW OFFICES OF RACHELLE CHONG  
345 WEST PORTAL AVENUE, STE. 110  
SAN FRANCISCO, CA 94127

THOMAS GREGORY  
DEPUTY DIR  
CENTER FOR INDEPENDENT LIVING  
2490 MARINER SQUARE LOOP, STE. 210  
ALAMEDA, CA 94501  
FOR: CENTER FOR INDEPENDENT LIVING

KATE LEFKOWITZ  
ASSOCIATE TRANSPORTATION PLANNER  
ALAMEDA TRANSPORTATION COMMISSION  
1111 BROADWAY, SUITE 800  
OAKLAND, CA 94607

ANH NGUYEN  
MGR., ADA PROGRAMS DIV.  
CITY OF OAKLAND  
1 FRANK OGAWA PLAZA, 11TH FL.  
OAKLAND, CA 94612

ADRIAN SLIPSKI  
LEGAL FELLOW  
CENTER FOR ACCESSIBLE TECHNOLOGY  
3075 ADELINE STREET, SUITE 220  
BERKELEY, CA 94703

ALEX GHENIS  
POLICY & RESEARCH SPECIALIST  
WORLD INSTITUTE ON DISABILITY  
3075 ADELINE ST., SUITE 155  
BERKELEY, CA 94703

JAY CARSON  
ATTORNEY AT LAW  
NIELSEN MERKSAMER  
2350 KEMER BOULEVARD, SUITE 250  
SAN RAFAEL, CA 94901

JOANNA HUITT  
MOBILITY PLANNER  
MARIN TRANSIT  
711 GRANVE AVE, SUITE 110  
SAN RAFAEL, CA 94901

ACTIVE SCALER INC. DBA TAGSI  
1551 MCCARTHY BLVD, STE. 10  
MILPITAS, CA 95035

JOANNA EDMONDS  
TECHNICIAN - TRANSPORTATION PLANNING  
SCCRT  
1523 PACIFIC AVENUE  
SANTA CRUZ, CA 95060  
FOR: SANTA CRUZ COUNTY REGIONAL  
TRANSPORTATION COMMISSION

LORENA BERNAL-VIDAL  
PLANNER III  
SANTA CLARA VALLEY TRANSP. AUTHORITY  
3331 NORTH FIRST STREET, BUILDING A  
SAN JOSE, CA 95134-1927  
FOR: SANTA CLARA VALLEY TRANSPORTATION  
AUTHORITY

ELIZABETH RICHARDS  
ER CONSULTING  
607 ELMIRA RD. NO. 234  
VACAVILLE, CA 95687

CURTIS L. CHILD  
LEGISLATIVE DIR  
DISABILITY RIGHTS CALIFORNIA  
1831 K STREET  
SACRAMENTO, CA 95811-4114



4/15/2020

CPUC - Service Lists - R1902012

DOUGLAS ITO  
CALIF PUBLIC UTILITIES COMMISSION  
CONSUMER PROTECTION AND ENFORCEMENT DIVI  
300 Capitol Mall  
Sacramento, CA 95814

FILIBERTO A. PINEDA  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSIONER RECHTSCHAFFEN  
300 Capitol Mall  
Sacramento, CA 95814

LAURA MCWILLIAMS  
STATE SENATOR JERRY HILL  
STATE CAPITOL, ROOM 5035  
SACRAMENTO, CA 95814

ANDREW B. BROWN  
ATTORNEY AT LAW  
ELLISON SCHNEIDER HARRIS & DONLAN LLP  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO, CA 95816-5931  
FOR: INSTITUTIONAL EQUITY INVESTORS

---

[TOP OF PAGE](#)  
[BACK TO INDEX OF SERVICE LISTS](#)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

TNC Access For All Fund Claim Form

Claim Period: Q4 2019 (October - December 2019)

Carrier Name: *Uber Technologies, Inc.*

PSG#: 0038150

County	Expenditures (\$)
ALAMEDA	\$ 405,213.50
ALPINE	\$ -
AMADOR	\$ -
BUTTE	\$ -
CALAVERAS	\$ -
COLUSA	\$ -
CONTRA COSTA	\$ 73,533.91
DEL NORTE	\$ -
EL DORADO	\$ -
FRESNO	\$ -
GLENN	\$ -
HUMBOLDT	\$ -
IMPERIAL	\$ -
INYO	\$ -
KERN	\$ -
KINGS	\$ -
LAKE	\$ -
LASSEN	\$ -
LOS ANGELES	\$ 1,565,422.98
MADERA	\$ -
MARIN	\$ 1,185.04
MARIPOSA	\$ -
MENDOCINO	\$ -
MERCED	\$ -
MODOC	\$ -
MONO	\$ -
MONTEREY	\$ 395.01
NAPA	\$ -
NEVADA	\$ -
<b>Subtotal</b>	<b>\$ 2,045,750.44</b>

County	Expenditures (\$)
ORANGE	\$ 52,226.96
PLACER	\$ -
PLUMAS	\$ -
RIVERSIDE	\$ 4,743.84
SACRAMENTO	\$ 395.01
SAN BENITO	\$ -
SAN BERNARDINO	\$ -
SAN DIEGO	\$ -
SAN FRANCISCO	\$ 234,795.70
SAN JOAQUIN	\$ 3,952.16
SAN LUIS OBISPO	\$ -
SAN MATEO	\$ 140,916.14
SANTA BARBARA	\$ -
SANTA CLARA	\$ 314,659.22
SANTA CRUZ	\$ -
SHASTA	\$ -
SIERRA	\$ -
SISKIYOU	\$ -
SOLANO	\$ 790.02
SONOMA	\$ -
STANISLAUS	\$ -
SUTTER	\$ -
TEHAMA	\$ -
TRINITY	\$ -
TULARE	\$ -
TUOLUMNE	\$ -
VENTURA	\$ 1,355.39
YOLO	\$ -
YUBA	\$ -
<b>Subtotal</b>	<b>\$ 753,834.44</b>

**Total Claim** \$ 2,799,584.88

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing 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: 1455 Market Street, 4th Floor, San Francisco, CA 94103

Title: Director, Central Operations

Date: April 15, 2020

Phone: (707) 572-5216

Email: WestRegs@uber.com

**APPENDIX A**

**Uber Technologies, Inc. Cost Summary**  
**Reporting Period Q4 2019**

<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>		
Transportation Service Partner Fees/Incentives and/or Management Fees		
Vehicle Subsidies		
Consultants/Legal		
Other (Describe)		
<b>Marketplace Costs</b>		
Recruiting		
Driver Onboarding		
Training Costs		
Driver Incentives		
Promo Codes for WAV		
Other (Describe)		
<b>Operational Costs</b>		
Marketing Costs		
Technology Investments/Engineering Costs/Enhancements		
Community Partnership/Engagement Costs		
Rental Management		
Pilot Management		
Wages, Salaries and Benefits (non-maintenance personnel)		
Other (Driver & Rider Support)		
<b>Other (Describe)</b>	\$	-
<b>Total</b>		

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: 1455 Market Street, 4th Floor, San Francisco, CA 94103

Title: Director, Central Operations

Date: April 15, 2020

Phone: (707) 572-5216

Email: WestRegs@uber.com

## ATTACHMENT B

### Uber Technologies, Inc.'s Outreach Materials Advice Letters 1 through 3 April 15, 2020

---

#### Overview

Uber Technologies, Inc. (“Uber”) began implementation of UberWAV as a pilot program in August 2018, eleven months prior to the California Public Utilities Commission administering the State program under the TNC Access for All Act (SB 1376).<sup>1</sup> Uber has conducted an outreach program to build rider and stakeholder understanding of the UberWAV program, solicit feedback from riders and stakeholders and translate learnings into refinements and updates to benefit users.

Elements of UberWAV outreach have included a CEO-level communication as part of the initial public awareness effort; assignment of personnel with experience in partnership development with organizations that serve wheelchair riders; information provided in-language via the Uber app and in accessible formats; informational webpages; earned and social media; driver training and education via a third-party partner; and engagement with community stakeholders. Additionally, the UberWAV program conducted periodic reviews to assess learnings and develop process and product improvements based on feedback received via outreach. Finally, as the UberWAV program grows under the rules adopted in March 2020, Uber is expanding its outreach to include more community stakeholders and greater consultation with community groups, with an emphasis on vulnerable and disadvantaged populations.

#### CEO-level Communications

Public awareness efforts in support of the UberWAV program were initiated with a message from company CEO, Dara Khosrowshahi, announcing a partnership with MV Transportation, a national third-party transportation provider, deploying a fleet of drivers and hundreds of WAVs available via the Uber app in several cities, including Los Angeles County and the greater San Francisco Bay Area.<sup>2</sup> In March 2018, Uber sponsored the California Society for the Blind’s annual gala, and an Uber representative spoke in multiple forums on Uber’s support for SB 1376 and the expansion of UberWAV in California. The public awareness effort also included media relations, social media postings, rider outreach and stakeholder outreach.

---

<sup>1</sup> S.B. 1376 (“SB 1376”), Cal. Legis. Serv. Ch. 701 (2018).; Pub. Util. Code § 5440.5.

<sup>2</sup> “An Improved Experience for Riders in Wheelchairs,” by Dara Khosrowshahi, (Nov. 20, 2018).

## **Program Information and Partner Outreach**

Information about UberWAV has been disseminated via earned media, email communications, social media and outreach to accessibility groups. Qualified staff with expertise in disabled community engagement and partnership development was assigned to support this effort. Media efforts have secured coverage in California media outlets (*e.g.*, *San Francisco Chronicle* and *Los Angeles Times*) and outlets focused on the accessibility community (*e.g.*, *Muscular Dystrophy News Today* and *Interactive Accessibility*) in addition to national and technology-oriented media outlets.

Additionally, between July 2019 and March 2020, the UberWAV program contacted, consulted with or disseminated program information to 15 community advocates and stakeholders, including the Center for Independent Living, the Center for Accessible Technology and On Lok Lifeways. As part of outreach, Uber has requested feedback on outreach opportunities to reach disabled consumers and provided a California-specific instructional fact sheet on accessing UberWAV for these organizations to share with their constituents. The instructional fact sheet is Section 508 compliant and translations are now available in Spanish, simplified Chinese, Tagalog, and Vietnamese.

These efforts are supported by a dedicated webpage for UberWAV<sup>3</sup> and an accessibility webpage that provides updates on new products, features, and initiatives to improve the mobility and independence for riders with disabilities.<sup>4</sup> This digital information is available in four (4) languages and includes Frequently Asked Questions, tools for consumers and a step-by-step explanation of how to use the service.

In January 2020, the company provided sponsorship to the Center for Independent Living. In March 2020, Uber developed a list of more than 100 community groups and accessibility stakeholders to contact as UberWAV grows and scales. As part of expanded outreach in 2020, Uber has engaged an external consulting firm to identify community partners to provide feedback on Uber's outreach efforts and to distribute information about UberWAV to their constituents. Additionally, in March 2020, Uber began outreach to community-based organizations to assess specific mobility challenges posed by the COVID-19 pandemic and California shelter-in-place order to individuals who use wheelchairs. As part of that effort, six community stakeholders in the San Francisco Bay Area and Los Angeles County were contacted to assess these challenges.<sup>5</sup>

## **Applying Rider and Stakeholder Feedback**

---

<sup>3</sup> <https://www.uber.com/us/en/ride/uberwav/>.

<sup>4</sup> <https://www.uber.com/us/en/about/accessibility/>.

<sup>5</sup> [Q1 2020], (Mar. 25-31, 2020).

On a periodic basis, the UberWAV program team met to assess learnings based on feedback received via outreach. Over the course of the program, an example of product or process improvements conducted as a result of passenger, driver and community stakeholder feedback including a strong preference for side-entry vehicles for safety and comfort reasons. The UberWAV program has also received feedback from riders and advocates that riders who use wheelchairs want the ability to schedule rides with UberWAV, and the development team is actively working to improve the reservations functionality for UberWAV.

<b>Outreach List</b>	
<p><b>Public Agencies</b></p> <ol style="list-style-type: none"> <li>1. Access LA</li> <li>2. AC Transit</li> <li>3. Alameda County Transportation Commission</li> <li>4. Bay Area Metro Center</li> <li>5. City of Los Angeles</li> <li>6. City of Oakland</li> <li>7. City of San Diego</li> <li>8. Los Angeles County Metropolitan Transportation Authority</li> <li>9. Los Angeles Department of Disability</li> <li>10. City and County of San Francisco</li> <li>11. Marin Transit Authority</li> <li>12. The San Diego Association of Governments</li> <li>13. San Francisco Mayor’s Office on Disability</li> <li>14. San Francisco Municipal Transportation Agency</li> <li>15. Solano Transportation Authority</li> <li>16. The University of California, Berkeley</li> </ol>	<p><b>Community Stakeholders</b></p> <ol style="list-style-type: none"> <li>1. American Association of People with Disabilities</li> <li>2. The Center for Accessible Technology</li> <li>3. The Center for Independent Living</li> <li>4. Designing Accessible Communities</li> <li>5. Disabled American Veterans of San Francisco</li> <li>6. Disability Community Resource Center of Los Angeles</li> <li>7. Disability Rights Education &amp; Defense Fund</li> <li>8. Disability Rights California</li> <li>9. FACT - Facilitating Access to Coordinated Transportation</li> <li>10. GuerneWood Neighborhood Association</li> <li>11. Jewish Family Services of Los Angeles</li> <li>12. On Lok Lifeways</li> <li>13. Shaping Mobility</li> <li>14. Stepping Thru Accessibility</li> <li>15. World Institute on Disability</li> <li>16. YMCA of San Francisco</li> </ol>

# UberWAV Initial Public Awareness Activities

US | Nov 20, 2018 Uber Newsroom

## An Improved Experience for Riders in Wheelchairs

— Written by Dara Khosrowshahi, CEO, Uber

### Examples

- CEO communications
- Rider outreach
- Social media posts
- Earned media
- Accessibility stakeholder outreach

### Placements Seen In



### Social Media Posts



Uber ✓  
@Uber

We want everyone to be able to get a ride with Uber. That's why we're investing in getting more wheelchair accessible vehicles on the road. Hear from our CEO @dkhos: [ubr.to/uberwav](http://ubr.to/uberwav)



dara khosrowshahi ✓  
@dkhos Following

We want to make accessibility a meaningful part of what we do. I'm proud we're taking this step to improve options for riders in wheelchairs.



Uber ✓ @Uber

We want everyone to be able to get a ride with Uber. That's why we're investing in getting more wheelchair accessible vehicles on the road. Hear from our CEO @dkhos: [ubr.to/uberwav](http://ubr.to/uberwav)

# UberWAV Public Information Materials - Digital Fact Sheet

## Acceder a WAV con la aplicación Uber

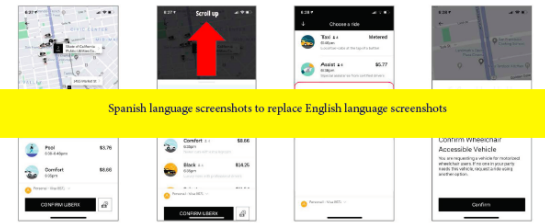
Los vehículos de MV Transportation accesibles para sillas de rueda se encuentran disponibles por medio de la aplicación Uber en el Condado Los Ángeles y el Área de la Bahía de San Francisco

Uber

### Cómo solicitar un WAV

Paso 1 → Descargue la aplicación Uber (<https://ubrt.to/2ypp8W5>) Paso 2 → Solicite su WAV

Imagen 1: Comience pidiendo un viaje como lo hace 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 Ángeles y en el área de la Bahía de San Francisco: los condados de San Francisco, Alameda, Contra Costa, Santa Clara, San Mateo, Marin, Sonoma, Solano, Napa y Santa Cruz.

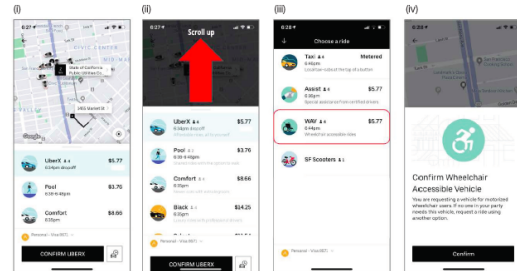
## Accessing WAV in the Uber App

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

Uber

### How to Ride with WAV

Step 1 → Download the Uber App Step 2 → Request a WAV Step 2(i) - (iv)



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

## Affordable, On-Demand Rides in Wheelchair-Accessible Vehicles

### Fast, flexible rides

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

### Trips that fit your budget

WAV rides are priced the same as UberX rides.

### Specialized drivers to assist you

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

## Follow UberWAV

What is UberWAV? Website and FAQ ([uber.com/ride/uberwav](https://uber.com/ride/uberwav))

A Letter from our CEO on Improving Accessible Service

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



## UberWAV Public Information Materials - Webpage

### Accessibility at Uber

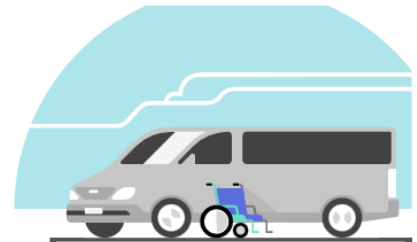
Our technology has transformed mobility for many people with disabilities, and we're committed to continuing to develop solutions that support everyone's ability to easily move around their communities.\*



### 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