

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

TNC & AL FILER INFORMATION

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

AL INFORMATION

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

SUBMISSION INFORMATION

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

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

FOR CPUC USE ONLY

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



Uber Technologies, Inc.
1455 Market Street
San Francisco, CA 94103
uber.com

December 4, 2020
Uber Technologies, Inc.
PSG0038150
Advice Letter No. 3A

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. 3A

I. Purpose

Pursuant to Decision (D.) 20-03-007, Uber Technologies, Inc. (Uber) submits this Advice Letter No. 3A to request to retroactively offset Quarter 1 of 2020 “TNC Access For All Fund”¹ fee payments, by the amounts spent by Uber to improve wheelchair accessible vehicle (WAV) service in Quarter 1 of 2020. Consistent with Rule 7.5.1 of General Order 96-B, Uber makes no changes from Advice Letter No. 3 regarding the existing requested effective date.

Uber submits this supplement to address a California Public Utilities Commission (“Commission”) Consumer Protection Enforcement Division (“CPED”) staff request sent via email by Mr. Reagan Rockzsfforde on September 25th, 2020. In that email, the CPED staff requested that Uber file a supplement to Advice Letter No. 3 (filed on April 15, 2020) to provide further information consistent with a revised data template attached in the email. The CPED staff also requested that Uber include contract information pursuant to D.20-03-007, Order Paragraph 11. Finally, the CPED staff requested that Uber revise its advice letter to remove counties that the CPED staff determined were not eligible for offsets because “Uber did not satisfy the requirement to demonstrate improvement from the prior quarter.” This Advice Letter No. 3A addresses the CPED staff’s request and updates the explanations below consistent with Uber’s most recent advice letters, Advice Letters No. 6 and 7. Further, in accordance with Commission Resolution ALJ-388 Order Paragraph 3, this Advice Letter No. 3A is being served fully unredacted to the service list in Rulemaking 19-02-012.²

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

² This Advice Letter No. 3A contains all relevant information that was contained in Advice Letter 3, plus additional information requested by CPED.

The offset amounts requested by geographic areas are as follows:

County	Expenditures³ (\$)
ALAMEDA	\$ 294,451.80
ALPINE	\$ -
AMADOR	\$ -
BUTTE	\$ -
CALAVERAS	\$ -
COLUSA	\$ -
CONTRA COSTA	\$ 90,503.50
DEL NORTE	\$ -
EL DORADO	\$ -
FRESNO	\$ -
GLENN	\$ -
HUMBOLDT	\$ -
IMPERIAL	\$ -
INYO	\$ -
KERN	\$ -
KINGS	\$ -
LAKE	\$ -
LASSEN	\$ -

County	Expenditures (\$)
ORANGE	\$ 61,204.49
PLACER	\$ -
PLUMAS	\$ -
RIVERSIDE	\$ 1,406.80
SACRAMENTO	\$ -
SAN BENITO	\$ -
SAN BERNADINO	\$ -
SAN DIEGO	\$ -
SAN FRANCISCO	\$ -
SAN JOAQUIN	\$ 8,948.87
SAN LUIS OBISPO	\$ -
SAN MATEO	\$ 210,816.01
SANTA BARBARA	\$ -
SANTA CLARA	\$ 268,136.10
SANTA CRUZ	\$ -
SHASTA	\$ -
SIERRA	\$ -
SISKIYOU	\$ -

³ The expenditures included here are not exhaustive and inclusive of all amounts spent by Uber in relation to enabling WAV service on the Uber platform.

LOS ANGELES	\$ 1,895,713.27
MADERA	\$ -
MARIN	\$ -
MARIPOSA	\$ -
MENDOCINO	\$ -
MERCED	\$ -
MODOC	\$ -
MONO	\$ -
MONTEREY	\$ -
NAPA	\$ -
NEVADA	\$ -

Subtotal \$ 2,280,668.57

SOLANO	\$ -
SONOMA	\$ -
STANISLAUS	\$ -
SUTTER	\$ -
TEHAMA	\$ -
TRINITY	\$ -
TULARE	\$ -
TUOLUMNE	\$ -
VENTURA	\$ -
YOLO	\$ -
YUBA	\$ -

Subtotal \$ 550,512.27

Total Offset \$ 2,831,180.84

II. Background

In 2018, Senate Bill (SB) 1376, the “TNC Access for All Act,” was enacted by the California Legislature.⁴ 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.⁵

Uber recognizes its unique position as a TNC to enable increased access to third-party WAVs⁶ available for request via its online-enabled application, and appreciates the opportunity to submit this retroactive offset request advice letter.

⁴ S.B. 1376 ; *see also* Pub. Util. Code § 5440.5.

⁵ D.20-03-007, Decision on Track 2 Issues: Offsets, Exemptions and Access Provider Disbursements (“D.20-03-007”), March 19, 2020.; Pub. Util. Code § 5440.5(a)(1)(B)(ii).

⁶ 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.”).

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.

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.

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 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 application to service the public's demand, especially when geographic and temporal factors were taken into account.

Uber has invested significant capital to enable increased access to WAV service throughout California by partnering with third-party WAV providers. For example, in Quarter 1 of 2020 Uber spent \$3.8 million on payments to third-party partners with WAVs. Further, Uber is investing heavily to keep WAV trips priced the same as a similar UberX trip, 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.

During Quarter 1 of 2020, Uber partnered with MV Transportation, Inc. (MV Transportation), a national transportation provider offering on-demand accessible transportation for people with disabilities and seniors, to enable their fleet of drivers and WAV vehicles to be available for request via the Uber app. All WAVs added to the Uber platform by MV Transportation were owned by MV Transportation and operated by their drivers, all of whom had 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.

In accordance with D.20-03-007 and the templates provided by the Commission, Uber provides the following supporting information within this Advice Letter “38150 Uber Technologies, Inc. AL 3A Supplement Forms” and accompanying Attachments A - C; and the master data sheet entitled “38150 Uber Technologies, Inc. AL 3A Supplement Data.”

1. Number of WAVs in Operation

Data on the number of WAVs in operation throughout California, in Quarter 1 of 2020, 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.

2. Number and Percentage of WAV Trips

Data provided on the number and percentage of WAV trips throughout California, in Quarter 1 of 2020, 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 through analysis of these percentage rates alone. Additionally, the number and percentage of WAV trips can be impacted by the geographical and temporal distribution of WAV trip requests.

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

Uber has also included data for “Cancellations - Completed” and “Cancellations - Not Completed” based on the CPUC’s latest reporting instructions and revised data template.⁷

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. Importantly, WAV service on the Uber app is enabled 24 hours a day, 7 days a week. Given Uber’s commitment to providing the most hours of WAV service possible, the fact that WAVs are servicing trips in a reasonable time compared to alternative accessible options 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 time thresholds may disincentivize expansion of WAV service to these unserved or underserved communities.

⁷ Per CPUC’s instructions received via email on September 25th, 2020 in the file attachment labeled “Data Template Changes 092520.pdf”, Uber has calculated “Cancellations - Completed” and “Cancellations - Not Completed” as the total number of times that a trip request was accepted and canceled by a driver and redispached among trip requests that were ultimately completed and not completed, respectively. E.g., per CPUC’s example, if trip request A was accepted, canceled and redispached a total of 5 times before being completed, then Uber would add 5 to the total count reported in the “Cancellations - Completed” tab of the templates. Similar to previous instruction regarding counting trips, Uber has reported cancelations for the day and hour of the ultimate trip event.

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 resulting in increased demand for WAV trips. 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. 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 C. In the tab “Outreach Efforts” there may be date ranges in the columns labeled “Date” that are associated with email and phone outreach. These ranges reflect the range of start dates of outreach for specific partners in that county for email and phone outreach.

Uber began several outreach efforts prior to the official start date of Quarter 3 of 2019, 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 certain funds expended in Quarter 1 of 2020 is included in the tab “Funds Expended,” along with a certification sheet in tab “Funds Expended Certification,” which is also included in this Advice Letter as Attachment B.

As indicated in the supporting documentation provided, Uber is investing a significant amount of money to enable increased access to WAVs. It is more expensive to maintain and incentivize WAV trips over UberX trips, yet Uber 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. The amount Uber is investing on a per-trip basis is substantially more than the revenues generated from WAV trips. Further, the amounts included herein are not exhaustive and represent only a subset of the capital expended to enable the WAV program. Simply, the millions of dollars Uber has demonstrated it invests is purely to achieve an end goal of enabling access to accessible, on-demand transportation to the general population at a price, service level, and scale that simply is not commercially available anywhere else in the market today.

7. Contract Information

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

8. Certification of WAV Driver Training

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

9. 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.

10. 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.

* * * * *

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 4, 2020. If there are any questions regarding this advice letter, please contact Adam Bierman at westregs@uber.com.

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

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

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

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

Respectfully submitted,

/s/ Adam Bierman
Adam Bierman
Counsel, Regulatory
Uber Technologies, Inc.

Attachments



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: DECEMBER 3, 2020

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12/4/2020

CPUC - Service Lists - R1902012

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12/4/2020

CPUC - Service Lists - R1902012

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ATTACHMENT A

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

TNC Access For All Fund Claim Form

Claim Period: Q1 2020 (January - March 2020)

Carrier Name: Uber Technologies, Inc.

PSG#: 0038150

County	Expenditures (\$)
ALAMEDA	\$ 294,451.80
ALPINE	\$ -
AMADOR	\$ -
BUTTE	\$ -
CALAVERAS	\$ -
COLUSA	\$ -
CONTRA COSTA	\$ 90,503.50
DEL NORTE	\$ -
EL DORADO	\$ -
FRESNO	\$ -
GLENN	\$ -
HUMBOLDT	\$ -
IMPERIAL	\$ -
INYO	\$ -
KERN	\$ -
KINGS	\$ -
LAKE	\$ -
LASSEN	\$ -
LOS ANGELES	\$ 1,895,713.27
MADERA	\$ -
MARIN	\$ -
MARIPOSA	\$ -
MENDOCINO	\$ -
MERCED	\$ -
MODOC	\$ -
MONO	\$ -
MONTEREY	\$ -
NAPA	\$ -
NEVADA	\$ -
Subtotal	\$ 2,280,668.57

County	Expenditures (\$)
ORANGE	\$ 61,204.49
PLACER	\$ -
PLUMAS	\$ -
RIVERSIDE	\$ 1,406.80
SACRAMENTO	\$ -
SAN BENITO	\$ -
SAN BERNADINO	\$ -
SAN DIEGO	\$ -
SAN FRANCISCO	\$ -
SAN JOAQUIN	\$ 8,948.87
SAN LUIS OBISPO	\$ -
SAN MATEO	\$ 210,816.01
SANTA BARBARA	\$ -
SANTA CLARA	\$ 268,136.10
SANTA CRUZ	\$ -
SHASTA	\$ -
SIERRA	\$ -
SISKIYOU	\$ -
SOLANO	\$ -
SONOMA	\$ -
STANISLAUS	\$ -
SUTTER	\$ -
TEHAMA	\$ -
TRINITY	\$ -
TULARE	\$ -
TUOLUMNE	\$ -
VENTURA	\$ -
YOLO	\$ -
YUBA	\$ -
Subtotal	\$ 550,512.27

Total Claim \$ 2,831,180.84

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: December 4, 2020

Phone: (707) 572-5216

Email: WestRegs@uber.com

ATTACHMENT B

APPENDIX A	
Uber Technologies, Inc. Cost Summary	
Reporting Period Q1 2020	
Vehicle Costs	\$ -
Lease/Rental/Purchase Costs	\$ -
Rental Subsidies for Driver	\$ -
Inspections	\$ -
Maintenance, Service & Warranty	\$ -
Fuel Cost	\$ -
Cleaning Supplies/Services	\$ -
Other (Describe)	\$ -
Partnership Costs	\$ 3,779,550.96
Transportation Service Partner Fees/Incentives and/or Management Fees	\$ 3,768,960.52
Vehicle Subsidies	\$ -
Consultants/Legal	\$ 10,590.44
Other (Describe)	\$ -
Marketplace Costs	\$ 5,983.91
Recruiting	\$ -
Driver Onboarding	\$ 3,616.80
Training Costs	\$ -
Driver Incentives	\$ -
Promo Codes for WAV	\$ 2,367.11
Other (Describe)	\$ -
Operational Costs	\$ 235,966.97
Marketing Costs	\$ -
Technology Investments/Engineering Costs/Enhancements	\$ 160,862.24
Community Partnership/Engagement Costs	\$ 10,000.00
Rental Management	\$ -
Pilot Management	\$ -
Wages, Salaries and Benefits (non-maintenance personnel)	\$ 63,886.76
Other (Describe)	\$ 1,217.97
Other (Describe)	\$ -
Total Expended	\$ 4,021,501.84
Total Offset Requested	\$ 2,831,180.84

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: December 4, 2020
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ATTACHMENT C

ATTACHMENT C

Uber Technologies, Inc.'s Outreach Materials Advice Letters 1A through 3A December 4, 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).¹ 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.² 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.

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

² “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 UberWAV³ and an accessibility webpage that provides updates on new products, features, and initiatives to improve the mobility and independence for riders with disabilities.⁴ 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.⁵

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

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

⁵ [Q1 2020], (Mar. 25-31, 2020).

Applying Rider and Stakeholder Feedback

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.

Outreach List	
Public Agencies <ol style="list-style-type: none">1. Access LA2. AC Transit3. Alameda County Transportation Commission4. Bay Area Metro Center5. City of Los Angeles6. City of Oakland7. City of San Diego8. Los Angeles County Metropolitan Transportation Authority9. Los Angeles Department of Disability10. City and County of San Francisco11. Marin Transit Authority12. The San Diego Association of Governments13. San Francisco Mayor's Office on Disability14. San Francisco Municipal Transportation Agency15. Solano Transportation Authority16. The University of California, Berkeley	Community Stakeholders <ol style="list-style-type: none">1. American Association of People with Disabilities2. The Center for Accessible Technology3. The Center for Independent Living4. Designing Accessible Communities5. Disabled American Veterans of San Francisco6. Disability Community Resource Center of Los Angeles7. Disability Rights Education & Defense Fund8. Disability Rights California9. FACT - Facilitating Access to Coordinated Transportation10. GuerneWood Neighborhood Association11. Jewish Family Services of Los Angeles12. On Lok Lifeways13. Shaping Mobility14. Stepping Thru Accessibility15. World Institute on Disability16. YMCA of San Francisco

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



 **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



UberWAV Public Information Materials - Digital Fact Sheet

Acceder a WAV con la aplicación Uber

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

Uber

Cómo solicitar un WAV

Paso 1 → Descargue la aplicación Uber (<https://ubr.to/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.

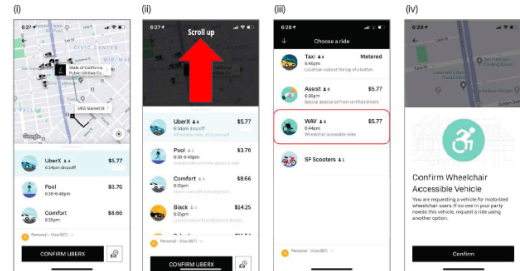
Accessing WAV in the Uber App

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)

A Letter from our CEO on Improving Accessible Service

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

UberWAV Public Information Materials - Webpage

Uber Products Company Safety Help

EN Log in Sign up

Accessibility at Uber

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



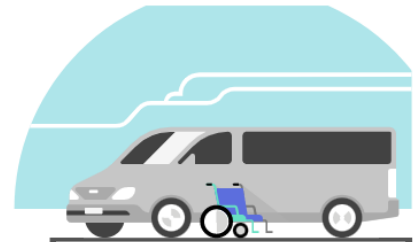
Uber Products Company Safety Help COVID-19 resources

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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