

**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

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

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

***Re: Uber Technologies, Inc. - Advice Letter No. 4A***

**I. Purpose**

Pursuant to Decision (D.) 20-03-007, Uber Technologies, Inc. (Uber) submits this Advice Letter No. 4A to request to offset Quarter 2 of 2020 “TNC Access For All Fund”<sup>1</sup> fee payments, by the amounts spent by Uber to improve wheelchair accessible vehicle (WAV) service in Quarter 2 of 2020. Consistent with Rule 7.5.1 of General Order 96-B, Uber makes no changes from Advice Letter No. 4 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. 4 (filed on July 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. This Advice Letter No. 4A 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.

The offset amounts requested by geographic areas are as follows:

<b>County</b>	<b>Expenditures<sup>2</sup> (\$)</b>
<b>ALAMEDA</b>	\$ 62,156.00
<b>ALPINE</b>	\$ -

<b>County</b>	<b>Expenditures (\$)</b>
<b>ORANGE</b>	\$ 21,488.29
<b>PLACER</b>	\$ -

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

<sup>2</sup> 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.

<b>AMADOR</b>	\$ -
<b>BUTTE</b>	\$ -
<b>CALAVERAS</b>	\$ -
<b>COLUSA</b>	\$ -
<b>CONTRA COSTA</b>	\$ 24,426.00
<b>DEL NORTE</b>	\$ -
<b>EL DORADO</b>	\$ -
<b>FRESNO</b>	\$ -
<b>GLENN</b>	\$ -
<b>HUMBOLDT</b>	\$ -
<b>IMPERIAL</b>	\$ -
<b>INYO</b>	\$ -
<b>KERN</b>	\$ 716.28
<b>KINGS</b>	\$ -
<b>LAKE</b>	\$ -
<b>LASSEN</b>	\$ -
<b>LOS ANGELES</b>	\$ 557,936.20
<b>MADERA</b>	\$ -
<b>MARIN</b>	\$ 2,507.97
<b>MARIPOSA</b>	\$ -
<b>MENDOCINO</b>	\$ -
<b>MERCED</b>	\$ -
<b>MODOC</b>	\$ -
<b>MONO</b>	\$ -
<b>MONTEREY</b>	\$ -

<b>PLUMAS</b>	\$ -
<b>RIVERSIDE</b>	\$ 716.28
<b>SACRAMENTO</b>	\$ -
<b>SAN BENITO</b>	\$ -
<b>SAN BERNARDINO</b>	\$ -
<b>SAN DIEGO</b>	\$ -
<b>SAN FRANCISCO</b>	\$ 89,046.52
<b>SAN JOAQUIN</b>	\$ 5,015.94
<b>SAN LUIS OBISPO</b>	\$ -
<b>SAN MATEO</b>	\$ 34,735.80
<b>SANTA BARBARA</b>	\$ -
<b>SANTA CLARA</b>	\$ 43,305.80
<b>SANTA CRUZ</b>	\$ -
<b>SHASTA</b>	\$ -
<b>SIERRA</b>	\$ -
<b>SISKIYOU</b>	\$ -
<b>SOLANO</b>	\$ -
<b>SONOMA</b>	\$ -
<b>STANISLAUS</b>	\$ 1,253.98
<b>SUTTER</b>	\$ -
<b>TEHAMA</b>	\$ -
<b>TRINITY</b>	\$ -
<b>TULARE</b>	\$ -
<b>TUOLUMNE</b>	\$ -
<b>VENTURA</b>	\$ -

NAPA	\$ -
NEVADA	\$ -

**Subtotal**                      \$647,742.45

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YOLO	\$ -
YUBA	\$ -

**Subtotal**                      \$195,562.61

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**Total Offset**                      **\$ 843,305.06**

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## II. Background

In 2018, Senate Bill (SB) 1376, the “TNC Access for All Act,” was enacted by the California Legislature.<sup>3</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>4</sup>

Uber recognizes its unique position as a TNC to enable increased access to third-party WAVs<sup>5</sup> available for request via its online-enabled application, and appreciates the opportunity to submit this offset request advice letter.

## III. Accessibility at Uber

As the first TNC in California to address WAV challenges on a 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

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<sup>3</sup> S.B. 1376; *see also* Pub. Util. Code § 5440.5.

<sup>4</sup> D.20-03-007, Decision on Track 2 Issues: Offsets, Exemptions and Access Provider Disbursements (“D.20-03-007”), March 19, 2020; Pub. Util. Code § 5440.5(a)(1)(B)(ii).

<sup>5</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.”).

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 app 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, even with ridership down *significantly* in Quarter 2 of 2020 due to the COVID-19 pandemic, Uber spent approximately <<Begin Confidential>>\$██████████<<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.

During Quarter 2 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 supporting information within this Advice Letter “38150 Uber Technologies, Inc. AL 4A Supplement Forms” and accompanying Attachments A - D; and the master data sheet entitled “38150 Uber Technologies, Inc. AL 4A Supplement Data.”

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

Data on the number of WAVs in operation throughout California, in Quarter 2 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 2 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.<sup>6</sup>

### **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 “Offset Response Time.”

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. 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.

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.

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

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<sup>6</sup> Per CPUC’s instructions received via email on September 25th, 2020 in the file attachment labeled “Data Template Changes 092520.pdf”, Uber has calculated “Cancellations - Completed” and “Cancellations - Not Completed” as the total number of times that a trip request was accepted and canceled by a driver and redispached among trip requests that were ultimately completed and not completed, respectively. E.g., per CPUC’s example, if trip request A was accepted, canceled and redispached a total of 5 times before being completed, then Uber would add 5 to the total count reported in the “Cancellations - Completed” tab of the templates. Similar to previous instruction regarding counting trips, Uber has reported cancelations for the day and hour of the ultimate trip event.

data should be considered holistically, as each piece of data is part of an overall picture of the county and California-wide service.

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

Information on outreach efforts is provided in the tab “Outreach Efforts,” and related substantive materials are attached to this Advice Letter filing as Attachment D. In the tab “Outreach Efforts” there may be date ranges in the columns labeled “Date” that are associated with email and phone outreach. These ranges reflect the range of start dates of outreach for specific partners in that county for email and phone outreach.

#### **5. Complaints**

Information is provided regarding complaints related to WAV services for each geographic area in the tab “Complaints.” In an effort to be comprehensive, some complaint information included may represent a situation unrelated to the actual quality of WAV service provided, such as inquiries regarding lost items and account or payment questions.

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

An accounting of certain funds expended in Quarter 2 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 C.

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**

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

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

Information regarding WAV Driver Training is provided in the tab “Training and Inspections.” The number of WAV drivers that have completed training is assigned according to the physical location of the fleet partner’s office, as that is where the training takes place.

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

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

**IV. Confidentiality**

In response to Resolution ALJ-388, Uber has made a good faith effort to publicly disclose as much information as feasible (including disclosure of otherwise business sensitive information) for the benefit of the public and to best advance the goals of the TNC Access for All Program. However, certain cost information included in this submission comprises Uber’s highly sensitive core trade secrets. Consequently, Uber requests that this information be kept confidential pursuant to General Order 96-B, Section 10.3. Specifically, Uber seeks confidential treatment of the following information: third party partner cost amounts, as reflected in the redacted portion of this Advice Letter No. 4A cover letter and in the redacted portions of worksheet tabs Funds Expended, Funds Expended Certification (the worksheet and the signed pdf document), and Contract Information, as set forth in greater detail in the attached Declaration of Confidentiality (Attachment A).

As required under General Order 96-B, Section 10.3(a)(iii), confidential information contained in this Advice Letter No. 4A submission will be made available to those who execute a nondisclosure agreement. Persons to contact regarding access to confidential information are as follows: (1) Lisa Tse (westregs@uber.com and ltse@uber.com); (2) Adam Bierman (adam.bierman@uber.com); or (3) Jane Lee (jylee@uber.com).

\* \* \* \* \*

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](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 Adam Bierman at [westregs@uber.com](mailto:westregs@uber.com).

To obtain information about the CPUC's procedures for advice letters and protests, visit CPUC's website at [www.cpub.ca.gov](http://www.cpub.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

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**PROCEEDING: R1902012 - CPUC - OIR TO IMPLEM**  
**FILER: CALIFORNIA PUBLIC UTILITIES COMMISSION**  
**LIST NAME: LIST**  
**LAST CHANGED: DECEMBER 3, 2020**

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[Back to Service Lists Index](#)

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### Parties

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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

ANNE MAYER  
EXE. DIR  
RIVERSIDE COUNTY TRANSP. COMMISSION  
4080 LEMON STREET, 3RD FL.  
RIVERSIDE, CA 92501  
FOR: RIVERSIDE COUNTY TRANSPORTATION  
COMMISSION

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

VARUN JAIN  
UBER TECHNOLOGIES, INC.  
1455 MARKET STREET, 4TH FLOOR  
SAN FRANCISCO, CA 94103  
FOR: UBER TECHNOLOGIES, INC.

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.

DANIEL ROCKEY  
PARTNER  
BRYAN CAVE LEIGHTON PAISNER LLP  
THREE EMBARCADERO CENTER, 7TH FL  
SAN FRANCISCO, CA 94111  
FOR: LYFT, 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 &

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

DEFENSE FUND (DREDF)

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  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

ANNA FERO  
 DAVIS WRIGHT TREMAINE LLP  
 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 PEPEL 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

PHILIP LAW  
 EMAIL ONLY  
 EMAILONLY, CA 00000

PRISCILLA FREDUAH-AGYEMANG  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

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

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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

TOM BELLINO  
EMAIL ONLY  
EMAIL ONLY, CA 00000

TRACI LEE  
SENIOR PUBLIC POLICY MANAGER  
LYFT  
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

ANDREI GREENAWALT  
HEAD OF PUBLIC POLICY  
VIA TRANSPORTATION INC.  
160 VARICK STREET, 4TH FL.  
NEW YORK, NY 10013  
FOR: VIA TRANSPORTATION INC.

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  
FOR: VIA TRANSPORTATION INC.

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

AARON HAKE

DAVID KNUDSEN

12/4/2020

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RIVERSIDE COUNTY TRANSP. COMMISSION  
4080 LEMON STREE, 3RD FL.  
RIVERSIDE, CA 92501

RIVERSIDE COUNTY TRANSP. COMMISSION  
4080 LEMON STREET, 3RD FL.  
RIVERSIDE, CA 92501

ERIC DEHATE  
RIVERSIDE COUNTY TRANSP. COMMISSION  
4080 LEMON STREET, 3RD FL.  
RIVERSIDE, CA 92501

LORELLE MOE-LUNA  
RIVERSIDE COUNTY TRANSP. COMMISSION  
4080 LEMON STREET, 3RD FL.  
RIVERSIDE, CA 92501

MONICA MORALES  
RIVERSIDE COUNTY TRANSP. COMMISSION  
4080 LEMON STREET, 3RD FL.  
RIVERSIDE, CA 92501

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  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

BRIAN KAHR  
CALIF PUBLIC UTILITIES COMMISSION  
TRANSPORTATION ENFORCEMENT BRANCH  
AREA 2-F  
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  
NEWS AND OUTREACH OFFICE  
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

REAGAN ROCKZSFORDE  
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

THERESA BUCKLEY  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5139  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ADAM BIERMAN  
UBER TECHNOLOGIES, INC.  
1455 MARKET STREET, 4TH FLOOR  
SAN FRANCISCO, CA 94103

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

JUSTINE WOODLAND  
UBER TECHNOLOGIES, INC.  
1455 MARKET STREET, 4TH FLOOR  
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

AICHI DANIEL  
COUNSEL, REGULATORY  
LYFT, INC.  
185 BERRY STREET, SUITE 5000  
SAN FRANCISCO, CA 94107

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

DEMETRIUS REAGANS  
LYFT, INC.  
185 BERRY STREET, SUITE 5000  
185 BERRY STREET, STE. 5000  
SAN FRANCISCO, CA 94107

IZZY GERUNDIO  
LYFT, INC.  
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

TAHIYA 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

REBECCA RUFF  
CENTER FOR ACCESSIBLE TECHNOLOGY  
3075 ADELIN STREET, SUITE 220  
BERKELEY, CA 94703

JAMES W. CARSON  
ATTORNEY AT LAW  
NIELSEN MERKSAMER PARRINELLO GROSS  
2350 KERNER 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  
SCCRTC  
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

DOUGLAS ITO  
CALIF PUBLIC UTILITIES COMMISSION  
CONSUMER PROTECTION AND ENFORCEMENT DIVI  
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

DARIN SANDS  
BRADLEY BERNSTEIN SANDS LLP  
PO BOX 4120, PMB 62056

HEIDI BRADLEY  
BRADLEY BERNSTEIN SANDS LLP  
113 CHERRY STREET

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# **ATTACHMENT A**

**ATTACHMENT A**  
**DECLARATION OF CONFIDENTIALITY**  
**PURSUANT TO GENERAL ORDER 96-B SECTION 10.3 AND**  
**GENERAL ORDER 66-D**  
**ON BEHALF OF UBER TECHNOLOGIES, INC.**  
**REGARDING ADVICE LETTER NO. 4A**

1. I, Peter Sauerwein, have been designated by Nelson Chai, Chief Financial Officer of Uber Technologies, Inc., (“Uber”) to submit this declaration, in accordance with the requirements set forth in General Order (“G.O.”) 66-D and General Order 96-B, Section 10.3, to assert that portions of the information contained in Uber’s Advice Letter No. 4A and the below listed supporting documents (together, “Advice Letter 4A Submission”) are confidential and should be protected from public disclosure.
2. Uber’s Advice Letter 4A Submission is being submitted by Uber to the California Public Utilities Commission (“CPUC” or “Commission”) on December 4, 2020, pursuant to D.20-03-007.
3. Throughout its Advice Letter 4A Submission, Uber has redacted figures which reflect funds paid in Quarter 2 of 2020 to third party partners that assist with and provide WAV services throughout the state. These cost figures reflect commercially sensitive and highly confidential contractual pricing terms that qualify as trade secrets under 18 U.S.C. § 1832 and Cal. Civil Code § 3426 et seq.<sup>1</sup>
  - a. Specifically, these redacted cost figures indicate the precise amounts of money that Uber has paid to its third party partners as part of its investment to develop and operate its WAV program throughout the state. These figures are broken down in different ways throughout Uber’s Advice Letter 4A Submission. In Uber’s Advice Letter 4A Cover Letter, the fees paid to third party transportation service partners are disclosed as a total. In the “Funds Expended” tab of the “38150 Uber Technologies, Inc. AL 4A Data” worksheets, third party cost figures are broken

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<sup>1</sup> As defined in California Civil Code § 3426.1(d), “trade secret” means “information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.”

down by type of expense (e.g., fees paid to third party transportation service partners and fees paid to third party consultants), and further broken down by county. In the “Contract Information” tab of the “38150 Uber Technologies, Inc. AL 4A Data” worksheets, the fees paid to third party transportation service partners are broken down by provider. In the “Funds Expended Certification” tab of the “38150 Uber Technologies, Inc. AL 4A Data” worksheets (and the signed PDF), the fees paid to third party transportation service partners and to third party consultants are again broken down by type of expense.

- b. Uber’s costs to third party partners constitute economically valuable information that is generally not known to the public. This information is particularly valuable to Uber during the early stage development of a program such as the WAV program by virtue of the fact that it is not public.<sup>2</sup> Uber has expended significant capital and resources to develop a first-of-its kind WAV program including, but not limited to, developing business relationships with its third party WAV partners, negotiating pricing terms for those third party services, and allocating money to invest in different markets. Uber’s costs (by type, by county, by partner, or in total) are a direct result of its internal, proprietary business processes, which it has invested substantial time, energy, and resources to develop.
- c. Disclosure of the redacted granular expense information would cause material economic harm to Uber by enriching competitors who gain access to information about Uber’s payments to third parties. While the information disclosed in the Advice Letter does not include precise contract terms regarding, for example, the fees charged by third party WAV providers for each ride taken on the platform, this information can be easily discerned by Uber’s competitors using other publicly available information. For example, competitors who have access to publicly disclosed information regarding the total number of WAV trips taken on the platform in Los Angeles County during a quarter could use straightforward

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<sup>2</sup> See, e.g., *Lion Raisins Inc. v. U.S. Dep’t of Agric.*, 354 F.3d 1072, 1080–81 (9th Cir. 2004) (where information collected by agency would allow a 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).

arithmetic to divide the total fees paid to Uber's transportation service partner in Los Angeles County to deduce the cost to Uber per ride using the third party service provider.

- d. With access to this information, Uber's competitors would be given a "free ride" for highly sensitive information about Uber's investments, resources, expenses, and efforts to build a WAV program with third party partners across the state. Using this information, competitors could cherry-pick markets for investment by analyzing, for example, which counties show the highest number of WAV trips for the lowest funds expended. Competitors could also seek to undercut Uber's contractual terms with its third party WAV partners by, for example, seeking out better contract terms with those same partners. These are just two examples of the ways in which competitors could seek to unfairly undermine Uber's WAV efforts by using Uber's own internally developed, confidential business information against it.
  - e. Further, third-party WAV partners could use this contract pricing information to identify opportunities to raise their prices. In addition to harming Uber, this increased cost would directly harm WAV users, as it would hamper Uber's ability to further invest in and expand its WAV service throughout the state, including reducing available funds for marketing, algorithmic improvements, or incentives for drivers.
  - f. Uber has taken every reasonable measure to protect the redacted information as highly confidential, including requiring confidentiality as a condition of each of its third party WAV partner agreements.
4. As described in Paragraph 3, the figures redacted throughout Uber's Advice Letter 4A Submission constitute trade secrets.
- a. The redacted information constitutes "business information (such as financial information, cost and pricing, manufacturing information . . . )" that Uber "has created, on its own, to further its business interests."<sup>3</sup> Specifically, as described in Paragraph 3(b) above, Uber invested heavily in the development of third party

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<sup>3</sup> Resolution ALJ-388, at 7.

WAV relationships, negotiated pricing with those partners, and determined appropriate amounts of investment for those partners.

- b. The type of cost information at issue can constitute a trade secret protected from disclosure. *See, e.g., Whyte v. Schlage Lock Co.*, 101 Cal. App. 4th 1443, 1455 (2002) (noting that “cases have recognized that information related to cost and pricing can be trade secret” and finding that information such as “pricing, profit margins, costs of production, pricing concessions, promotional discounts, advertising allowances, volume rebates, marketing concessions, payment terms and rebate incentives” had economic value and could constitute trade secret.).
  - c. The redacted information is also not generally “known to the public or to other persons who can obtain economic value from its disclosure or use.”<sup>4</sup> While certain WAV information is separately disclosed to the Commission in Uber’s Annual Reports and publicly disclosed as part of this Advice Letter 4A Submission, Uber does *not* publicly disclose amounts paid to third party partners in the WAV program, either in the Annual Reports or elsewhere. Thus, the amounts paid to third party WAV providers is not a subset of—or otherwise connected with—other information that is separately disclosed elsewhere. And while funds paid to third party partners submitted in *prior* Advice Letters have been publicly disclosed, the funds paid in the Second Quarter of 2020 have *not* been publicly disclosed in any format.
5. Because these figures constitute trade secrets, they are protected from disclosure under 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 Cal. Public Records Act 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.
  6. 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.

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<sup>4</sup> Cal. Civ. Code § 3426.1(d).

7. As discussed herein, Uber requests that the redacted portions of this Advice Letter 4A Submission be treated as confidential. As required under General Order 96-B, Section 10.3(a)(iii), this confidential information 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) Adam Bierman (adam.bierman@uber.com); or (3) Jane Lee (jylee@uber.com).

Respectfully submitted,

*/s/ Peter Sauerwein*

Peter Sauerwein  
Head of Regulatory Strategy  
& Operations, West  
Uber Technologies, Inc.



# **ATTACHMENT B**

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

Carrier Name: JOLIE LIMO LLC

PSG #: 33256-B

Pursuant to Decision 20-03-007 Ordering Paragraph 14(a) and 16(f), all Wheelchair Accessible Vehicle (WAV) drivers operating on TNCs platform shall have completed WAV driver training within the past three years. The required training shall include, at minimum below:

1. Sensitivity training
2. Passenger assistance techniques
3. Accessibility equipment use
4. Door-to-door service
5. Safety procedures

TNCs shall be responsible for ensuring that each of their WAV drivers complies with these requirements and shall maintain records of such compliance for the duration of the program which is scheduled to sunset on January 1, 2026.

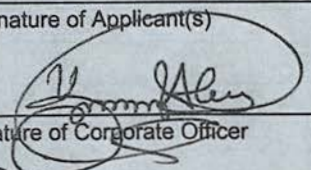
CERTIFICATION

I (we) certify (or declare), under penalty of perjury, that I (we) have read and understand the above requirement that all WAV drivers operating on TNCs platform must have completed WAV driver training within the past three years, and that I (we) am (are) to and will comply with it. I (we) certify (or declare), under penalty of perjury, that the foregoing is true and correct.

Date: July 10<sup>th</sup>, 2020

YOSEF JOE ALEM  
Print Name of Applicant/Officer

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

  
Signature of Corporate Officer

PRESIDENT  
Title of Corporate Officer

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

Carrier Name: MV Wave

PSG #: TCPO012064B

Pursuant to Decision 20-03-007 Ordering Paragraph 14(a) and 16(f), all Wheelchair Accessible Vehicle (WAV) drivers operating on TNCs platform shall have completed WAV driver training within the past three years. The required training shall include, at minimum below:

1. Sensitivity training
2. Passenger assistance techniques
3. Accessibility equipment use
4. Door-to-door service
5. Safety procedures

TNCs shall be responsible for ensuring that each of their WAV drivers complies with these requirements and shall maintain records of such compliance for the duration of the program which is scheduled to sunset on January 1, 2026.

CERTIFICATION

I (we) certify (or declare), under penalty of perjury, that I (we) have read and understand the above requirement that all WAV drivers operating on TNCs platform must have completed WAV driver training within the past three years, and that I (we) am (are) to and will comply with it. I (we) certify (or declare), under penalty of perjury, that the foregoing is true and correct.

Date: July 14, 2020

Myron Watkins  
Print Name of Applicant/Officer

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

  
Signature of Corporate Officer

VP Strategic Operations  
Title of Corporate Officer

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

Carrier Name: JOLIE LIMOLLC

PSG#: 33256B

Pursuant to Decision 20-03-007 Ordering Paragraphs 14(c) and 15(h), all Wheelchair Accessible Vehicles (WAVs) operating on a TNC's platform shall be inspected and approved to conform with the Americans with Disabilities Act Accessibility Specifications for Transportation Vehicles within the past year.

TNCs shall be responsible for ensuring that each of their WAVs complies with this requirement and shall maintain records of such compliance for the duration of the program which is scheduled to sunset on January 1, 2026.

CERTIFICATION

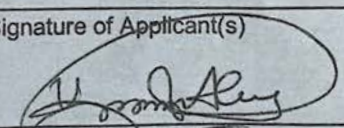
I (we) certify (or declare), under penalty of perjury, that I (we) have read and understand the above requirements that all WAVs operating on the TNC platform be inspected and approved to conform with the Americans with Disabilities Act (ADA) Accessibility Specifications for Transportation Vehicles, and that I (we) am (are) to and will comply with it. I (we) certify (or declare), under penalty of perjury, that the foregoing is true and correct.

Date: July 10<sup>th</sup>, 2020

JOSEF JOE ALSM

Print Name of Applicant/Officer

Signature of Applicant(s)

  
Signature of Corporate Officer

PRESIDENT  
Title of Corporate Officer

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

Carrier Name: MV Wave

PSG#: TCP0012064B

Pursuant to Decision 20-03-007 Ordering Paragraphs 14(c) and 15(h), all Wheelchair Accessible Vehicles (WAVs) operating on a TNC's platform shall be inspected and approved to conform with the Americans with Disabilities Act Accessibility Specifications for Transportation Vehicles within the past year.

TNCs shall be responsible for ensuring that each of their WAVs complies with this requirement and shall maintain records of such compliance for the duration of the program which is scheduled to sunset on January 1, 2026.

**CERTIFICATION**

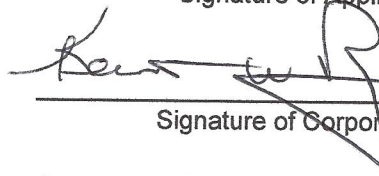
I (we) certify (or declare), under penalty of perjury, that I (we) have read and understand the above requirements that all WAVs operating on the TNC platform be inspected and approved to conform with the Americans with Disabilities Act (ADA) Accessibility Specifications for Transportation Vehicles, and that I (we) am (are) to and will comply with it. I (we) certify (or declare), under penalty of perjury, that the foregoing is true and correct.

Date: July 14, 2020

Kenneth Pouncey

Print Name of Applicant/Officer

Signature of Applicant(s)



Signature of Corporate Officer

Director, Fleet & Facilities Maintenance

Title of Corporate Officer

# **ATTACHMENT C**

**APPENDIX A**

**Uber Technologies, Inc. Cost Summary  
Reporting Period Q2 2020**

<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 (Describe)	\$	-
<b>Other (Describe)</b>	\$	-
<b>Total Expended</b>		
<b>Total Offset Requested</b>	\$	843,305.06

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

Phone: (707) 572-5216

Email: WestRegs@uber.com

# **ATTACHMENT D**



**Uber Technologies, Inc.**  
**UberWAV Outreach Narrative**  
**Q2 2020**

December 4, 2020

**Overview**

Uber Technologies, Inc. (Uber) continues its implementation of UberWAV service under the rules developed by the California Public Utilities Commission (CPUC) to implement the TNC Access for All Act (SB 1376). Between April and June 2020, Uber continued outreach to build understanding of the UberWAV program and solicit feedback from stakeholders. Efforts in this quarter included expanding outreach to community groups, including those that serve vulnerable populations, consulting with community groups on the needs of their constituents in light of the COVID-19 crisis, and answering questions about UberWAV service.

Elements of UberWAV outreach have included: information provided in-language and in accessible formats via the Uber app; informational web pages; earned and social media; driver training and education via a third-party partner; distribution of informational materials and engagement with stakeholder organizations. Additionally, the UberWAV program has conducted periodic reviews to assess learnings and develop outreach processes and product improvements based on feedback received via outreach.

**Program Information and Community Group Outreach**

Between April 2020 and June 2020, the UberWAV outreach program contacted, consulted with, or disseminated program information to stakeholder organizations, including disability groups, local agencies, community service providers, in-language service providers and community-based organizations. This quarter, Uber placed an emphasis on working to expand relationships with stakeholder groups outside its core urban areas and gaining an understanding of stakeholder needs and concerns in light of the COVID-19 crisis.

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 to these organizations to share with their constituents (see screenshots below). Translations of the fact sheet are available in Spanish, simplified Chinese, Tagalog, and Vietnamese. The digital fact sheet is compliant with accessibility requirements to enable public sector entities to post it online, as appropriate.

Outreach efforts in this quarter were conducted in twelve counties where UberWAV service is available. UberWAV outreach included the distribution of program materials via email, outreach phone calls, and consultation interviews, collectively totaling approximately 180 outreach contact points (with some

stakeholder organizations being reached both by email and phone). Uber prioritized outreach to include a wider range of stakeholders.

These efforts are supported by a dedicated [webpage for UberWAV](#), as well as an [accessibility webpage](#) that provides updates on new products, features, and initiatives to improve the mobility and independence for riders with disabilities. This digital information is available in four languages and includes Frequently Asked Questions, tools for consumers, and a step-by-step explanation of how to use the service (see screenshots below).

### **Stakeholder Interviews and Feedback**

Uber conducted interviews with ten stakeholder organizations, including the Pacific ADA Center, the College of Marin Disabled Students Program, and Asians and Pacific Islanders with Disabilities of California (APIDC). The purpose of the interviews was to consult with stakeholder organizations on the needs of wheelchair users, including any specific challenges as a result of COVID-19, inform outreach to wheelchair users, and identify outreach and partnership opportunities.

Interviewees provided feedback on how the COVID-19 crisis is impacting their constituents and services. Interviewee responses included requests for information on how Uber is responding to COVID-19 and safety protocols for riders and drivers; interest in communicating the service to constituents; requests for in-language outreach; questions about how different stakeholders can access the UberWAV service; and opportunities for outreach including speaking engagements and potential community partners to reach. Learnings from these interviews will be used to inform future outreach. Additionally, the UberWAV program team meets regularly to discuss and implement process improvements, as appropriate, as a result of multilayered stakeholder feedback.

## ATTACHMENTS

### UberWAV Public Information Materials - Fact Sheets Samples

#### Accessing WAV in the Uber App

MV Transportation's wheelchair accessible vehicles are now available via the Uber app in parts of Southern California and the San Francisco Bay Area

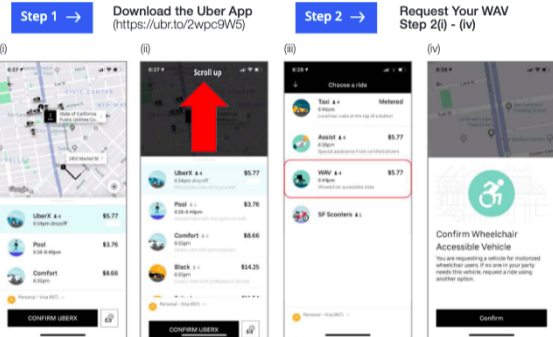
Uber

#### Acceder a WAV con la aplicación Uber

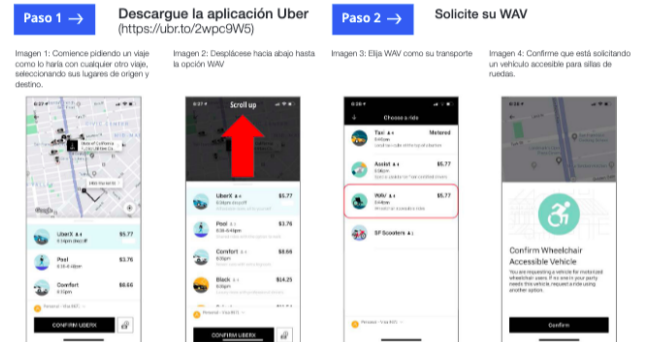
Los vehículos de MV Transportation accesibles para sillas de rueda se encuentran disponibles por medio de la aplicación Uber en el Condado Los Ángeles y el Área de la Bahía de San Francisco

Uber

#### How to Ride with WAV



#### Cómo solicitar un WAV



### 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 - Accessibility and UberWAV Webpages

# Accessibility at Uber

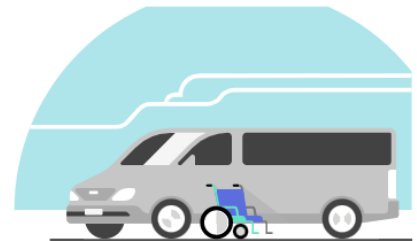
Our technology has transformed mobility for many people with disabilities, and we're committed to continuing to develop solutions that support everyone's ability to easily move around their communities.\*



# 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