

**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

November 20, 2020  
Uber Technologies, Inc.  
PSG0038150  
Advice Letter No. 6

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. 6*

**I. Purpose**

Pursuant to Decision (D.) 20-03-007, Uber Technologies, Inc. (Uber) submits this Advice Letter No. 6 to request to offset Quarter 3 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 3 of 2020. The requested effective date is December 20, 2020 (30 days from date of filing).<sup>2</sup>

The offset amounts requested by geographic areas are as follows:

County	Expenditures <sup>3</sup> (\$)
ALAMEDA	\$81,321.70
ALPINE	\$ -
AMADOR	\$ -
BUTTE	\$ -
CALAVERAS	\$ -

County	Expenditures (\$)
ORANGE	\$8,278.34
PLACER	\$ -
PLUMAS	\$ -
RIVERSIDE	\$1,133.44
SACRAMENTO	\$ -

<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> On October 15, 2020, Uber submitted Advice Letter No. 5, which requested fee offsets in certain counties for Quarter 3 of 2020, and fee exemptions in certain counties for Quarter 4 of 2020 through Quarter 3 of 2021. Pursuant to Consumer Protection and Enforcement Division’s directive, we withdrew Advice Letter No. 5 on November 12, 2020, and we are submitting our requests for fee offsets and fee exemptions as Advice Letters No. 6 and 7, respectively.

<sup>3</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>COLUSA</b>	\$ -
<b>CONTRA COSTA</b>	\$30,236.90
<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>	\$ -
<b>KINGS</b>	\$ -
<b>LAKE</b>	\$ -
<b>LASSEN</b>	\$ -
<b>LOS ANGELES</b>	\$675,444.60
<b>MADERA</b>	\$ -
<b>MARIN</b>	\$589.00
<b>MARIPOSA</b>	\$ -
<b>MENDOCINO</b>	\$ -
<b>MERCED</b>	\$ -
<b>MODOC</b>	\$ -
<b>MONO</b>	\$ -
<b>MONTEREY</b>	\$ -
<b>NAPA</b>	\$ -
<b>NEVADA</b>	\$ -

**Subtotal**           \$787,592.20

<b>SAN BENITO</b>	\$ -
<b>SAN BERNARDINO</b>	\$ -
<b>SAN DIEGO</b>	\$987.25
<b>SAN FRANCISCO</b>	\$47,534.47
<b>SAN JOAQUIN</b>	\$ -
<b>SAN LUIS OBISPO</b>	\$ -
<b>SAN MATEO</b>	\$54,929.90
<b>SANTA BARBARA</b>	\$ -
<b>SANTA CLARA</b>	\$68,190.80
<b>SANTA CRUZ</b>	\$ -
<b>SHASTA</b>	\$ -
<b>SIERRA</b>	\$ -
<b>SISKIYOU</b>	\$ -
<b>SOLANO</b>	\$ -
<b>SONOMA</b>	\$589.00
<b>STANISLAUS</b>	\$ -
<b>SUTTER</b>	\$ -
<b>TEHAMA</b>	\$ -
<b>TRINITY</b>	\$ -
<b>TULARE</b>	\$ -
<b>TUOLUMNE</b>	\$ -
<b>VENTURA</b>	\$834.11
<b>YOLO</b>	\$ -
<b>YUBA</b>	\$ -

**Subtotal**           \$182,477.31

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Total Offset

\$970,069.51

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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>4</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>5</sup>

Uber recognizes its unique position as a TNC to enable increased access to third-party WAVs<sup>6</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 widespread basis, Uber understands the hurdles associated with enabling increased access to WAVs on its platform. Uber’s technology is helping to increase mobility and independence for riders with disabilities, with features and capabilities like:

Cashless payments: Uber’s cashless payment option simplifies the payment process, reducing the need for riders to worry about counting out cash or exchanging bills with a driver.

On-demand transportation: The Uber app makes it easier for riders with disabilities to get from A to B at the touch of a button. They no longer have to arrange rides through a dispatcher or resort to other, less convenient, means of finding a ride.

Agreements and policies: Driver agreements, Uber’s Community Guidelines, Uber’s Service Animal Policy, and Uber’s Non-Discrimination Policy confirm that drivers must comply with all applicable laws, including, for example, those relating to their transportation of riders’ service animals.

Riders who are blind or low-vision: With iOS VoiceOver, Android TalkBack, and wireless Braille display compatibility, the Uber app makes it easier for riders who are blind or low-vision to get where they need to go.

Riders who are deaf or hard of hearing: Audio is not needed for full functionality of the Uber app. Assistive technology such as visible and vibrating alerts can help riders who

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<sup>4</sup> S.B. 1376; *see also* Pub. Util. Code § 5440.5.

<sup>5</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>6</sup> Pub. Util. Code § 5431.5(b) (“‘Wheelchair accessible vehicle’ or ‘WAV’ means a vehicle equipped with a ramp or lift capable of transporting non-folding motorized wheelchairs, mobility scooters, or other mobility devices.”).

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 in Quarter 3 of 2020 due to the COVID-19 pandemic, Uber spent approximately **<<Begin Confidential>>** [REDACTED] **<<End Confidential>>** on payments to third-party partners with WAVs. Further, Uber is investing heavily to keep WAV trips priced the same as a similar UberX trip, and to support this program as it grows and scales. Uber requests the Commission evaluate the supporting documentation provided in light of the amount spent to enable WAV service.

Uber recognizes its performance in California is not what would be expected based on Uber's results in the second quarter of 2020. The change in performance is primarily for two reasons. First, there were a number of COVID-19-related marketplace issues and anomalies. During the peak of COVID-19 lockdowns (starting in April 2020), WAV supply decreased by a much smaller proportion than the corresponding decrease in WAV demand. This dynamic was a factor in the reliability level of the WAV product in the second quarter. When WAV and overall TNC trip demand began recovering in the third quarter, reliability metrics began returning to earlier levels, better reflecting what we would expect to see in the market without COVID-19 anomalies, but appearing as a quarter-over-quarter decrease within the data.

Second, Uber's main service partner, MV Transportation, left the San Francisco Bay Area market in the third quarter.<sup>7</sup> During the second quarter, MV Transportation informed Uber that MV Transportation would be unable to continue its partnership in San Francisco. MV Transportation cited higher than forecasted operating costs and difficulty in hiring and retaining drivers in the San Francisco Bay Area as key reasons underlying its decision. At that time, Uber secured a multi-month extension of the partnership in an effort to delay the effects of a service disruption on riders with disabilities in San Francisco Bay Area counties.

Concurrently, Uber began an intensive search for alternative options for service providers in the market, including local fleets, other national fleets, and vehicle rental partners. Despite all of Uber's efforts, it was unable to secure a partnership with a service provider before its partnership with MV Transportation was terminated.

As a result, starting on September 1st when MV Transportation suspended operations in San Francisco Bay Area counties, UberWAV experienced a temporary service disruption in that region. In advance of the disruption, Uber notified the Commission and sent in-app messages and emailed customers who had recently used UberWAV in Northern California. The in-app messages and emails provided important information about what would happen and were designed to help users of UberWAV manage the temporary service disruption more effectively.

After a comprehensive selection process, Uber has identified a new service partner, Tower WAV LLC, to provide UberWAV services in San Francisco Bay Area counties. Tower WAV LLC will operate as a full service WAV provider that will hire and train drivers and own and maintain a fleet of WAV vehicles. Uber formally entered into an agreement with Tower WAV LLC on October 16, 2020, and Uber is working with Tower WAV LLC to bring WAV services back online in San Francisco Bay Area counties as soon as practicable in Q4 2020.

More broadly, Uber remains invested in building an ecosystem that includes multiple WAV partners throughout its active markets to minimize the possibility of future service disruptions. Uber also 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.

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<sup>7</sup> MV Transportation, Inc. (MV Transportation) is a national provider offering on-demand accessible transportation for people with disabilities and seniors. Uber had partnered with MV Transportation, Inc., 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.

AL 6 Forms” and accompanying Attachments B - D; and the master data sheet entitled “38150 Uber Technologies, Inc. AL 6 Data.”

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

Data on the number of WAVs in operation throughout California in Quarter 3 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 for each county.

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

Data provided on the number and percentage of WAV trips throughout California, in Quarter 3 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>8</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 data should be considered holistically, as each piece of data is part of an overall picture of the county and California-wide service.

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<sup>8</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.



#### **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 3 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 put, the millions of dollars Uber has demonstrated it invests intended 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. 6 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. 6 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 November 20, 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.cpuc.ca.gov](http://www.cpuc.ca.gov) and look for links to General Order 96-B.

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

Respectfully submitted,

    /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: NOVEMBER 6, 2020**

[Download the Comma-delimited File](#)  
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### Parties

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**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. 6**

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. 6 and the below listed supporting documents (together, “Advice Letter 6 Submission”) are confidential and should be protected from public disclosure.
2. Uber’s Advice Letter 6 Submission is being submitted by Uber to the California Public Utilities Commission (“CPUC” or “Commission”) on November 20, 2020, pursuant to D.20-03-007.
3. Throughout its Advice Letter 6 Submission, Uber has redacted figures which reflect funds paid in Quarter 3 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 6 Submission. In Uber’s Advice Letter 6 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 6 Data” worksheets, third party cost figures are broken down by type of expense (e.g., fees paid to third party transportation service

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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.”

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 6 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 6 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 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.

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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).

- 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 6 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 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

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

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 6 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 Third 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.
7. As discussed herein, Uber requests that the redacted portions of this Advice Letter 6 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).

---

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

Respectfully submitted,

**Peter Sauerwein**

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



**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.

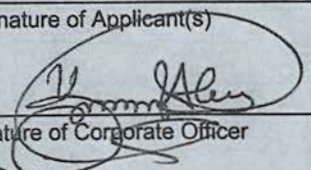
**CERTIFICATION**

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 LIMOLLE

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**

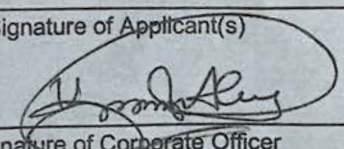
I (we) certify (or declare), under penalty of perjury, that I (we) have read and understand the above requirements that all WAVs operating on the TNC platform be inspected and approved to conform with the Americans with Disabilities Act (ADA) Accessibility Specifications for Transportation Vehicles, 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 ALAM

Print Name of Applicant/Officer

Signature of Applicant(s)

  
Signature of Corporate Officer

PRESIDENT  
Title of Corporate Officer

ATTACHMENT B

**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**

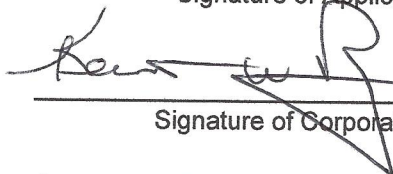
I (we) certify (or declare), under penalty of perjury, that I (we) have read and understand the above requirements that all WAVs operating on the TNC platform be inspected and approved to conform with the Americans with Disabilities Act (ADA) Accessibility Specifications for Transportation Vehicles, 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 Q3 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>	\$ 970,069.51

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: \_\_\_\_\_

Title: Director, Central Operations

Preparer: Uber Technologies, Inc.

Date: November 20, 2020

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

Phone: (707) 572-5216

Email: WestRegs@uber.com

## ATTACHMENT D

### Uber Technologies, Inc.'s Outreach Materials Narrative Advice Letter 6

November 20, 2020

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#### 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 July 2020 and September 2020, Uber continued outreach to enhance understanding of the UberWAV program and solicit feedback from stakeholders. Efforts in this quarter included additional outreach to community groups, with an emphasis on Southern California. Outreach remained focused on both answering questions about the UberWAV service as well as important health and sanitary protocols necessary to serve vulnerable populations during COVID-19.

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 July 2020 and September 2020, the UberWAV outreach program contacted, consulted with, or disseminated program information to more stakeholder organizations, including disability groups, local agencies, community service providers, in-language service providers and community-based organizations.

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* Section A.) The digital fact sheet is compliant with accessibility requirements to enable public sector entities to post it online, as appropriate.

Uber continued to conduct outreach in the areas where UberWAV service is available. UberWAV outreach in Q3 included the distribution of program materials via email, outreach phone calls,

and consultation interviews, collectively totaling 94 outreach actions (with some stakeholder organizations being reached both by email and phone).

Included in this effort was a presentation to the Inland Empire Disabilities Collaborative, a working group with over 450 member organizations in the Southern California region. (See Section D.) Uber's accessibility outreach team presented information on the UberWAV service and participated in a Q&A session with organizations present at the meeting.

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. (See Section B.) 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 Section B.) This quarter, Uber's accessibility outreach team developed a new outreach presentation for use with community groups.

### **Stakeholder Interviews and Feedback**

Uber conducted interviews with nine stakeholder organizations, including the Bay Area Outreach and Recreation Program, Community Resources for Independent Living, Marin Center for Independent Living, City Heights CDC, United Cerebral Palsy of Los Angeles, Ventura and Santa Barbara counties, and the Westside Regional Center. The interviews serve as an opportunity to consult with experts 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 stakeholder feedback.

During the third quarter, UberWAV experienced a temporary service disruption in the San Francisco Bay Area counties. The disruption began on September 1st when service provider MV Transportation suspended operations in San Francisco Bay Area counties. MV Transportation cited higher than forecasted operating costs and difficulty in hiring and retaining drivers in the San Francisco Bay Area as key reasons underlying its decision. For months, Uber had been

searching for alternative options for service providers in the market, including local fleets, other national fleets, and vehicle rental partners. Despite all of Uber's efforts, it was unable to secure a partnership with a service provider before its partnership with MV Transportation was terminated.

In advance of the disruption, Uber had notified the Commission and had sent in-app messages and emailed customers who had recently used UberWAV in Northern California. (*See* Section C.) The in-app messages and emails provided important information about what would happen and were designed to help users of UberWAV manage the temporary service disruption more effectively. Although MV Transportation suspended its San Francisco Bay Area operations, it remains one of Uber's partners in Southern California as well as other U.S. markets where WAV service is available.


After a comprehensive selection process, Uber has identified a new service partner, Tower WAV LLC, to provide UberWAV services in San Francisco Bay Area counties. Tower WAV LLC will operate as a full service WAV provider that will hire and train drivers and own and maintain a fleet of WAV vehicles. Uber formally entered into an agreement with Tower WAV LLC on October 16, 2020, and Uber is working with Tower WAV LLC to bring WAV services back online in San Francisco Bay Area counties as soon as practicable in Q4 2020. More broadly, Uber remains invested in building an ecosystem that includes multiple WAV partners throughout its active markets to minimize the possibility of future service disruptions.



## Section A: 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



**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



### Cómo solicitar un WAV

**Paso 1 →** Descargue la aplicación Uber (<https://ubr.to/2wpc9W5>)

**Paso 2 →** Solicite su WAV

Imagen 1: Comencio pidiendo un viaje como lo haria 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

Imagen 4: Confirme que está solicitando un vehículo accesible para sillas de ruedas.



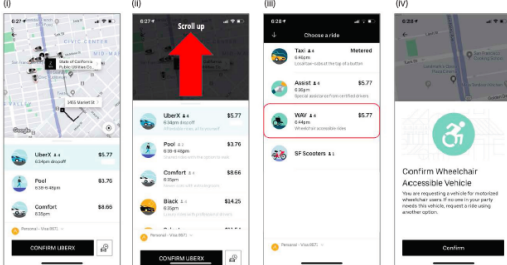
Spanish language screenshots to replace English language screenshots

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.

### How to Ride with WAV

**Step 1 →** Download the Uber App

**Step 2 →** Request a WAV Step 2(i) - (iv)



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

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

### Fast, flexible rides

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

### Trips that fit your budget

WAV rides are priced the same as UberX rides.

### Specialized drivers to assist you

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

## Follow UberWAV

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

A Letter from our CEO on Improving Accessible Service

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

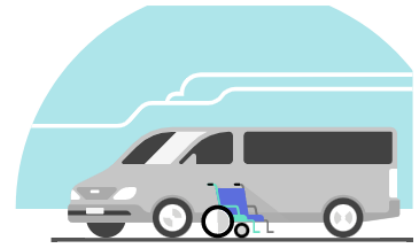
## Section B: UberWAV Public Information Materials - Webpage

Uber Products Company Safety Help COVID-19 resources EN Log in Sign up

# 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](#)

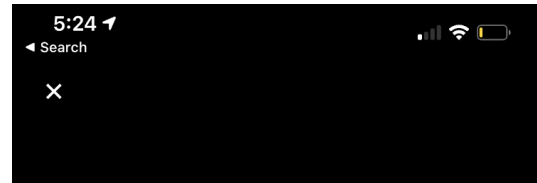
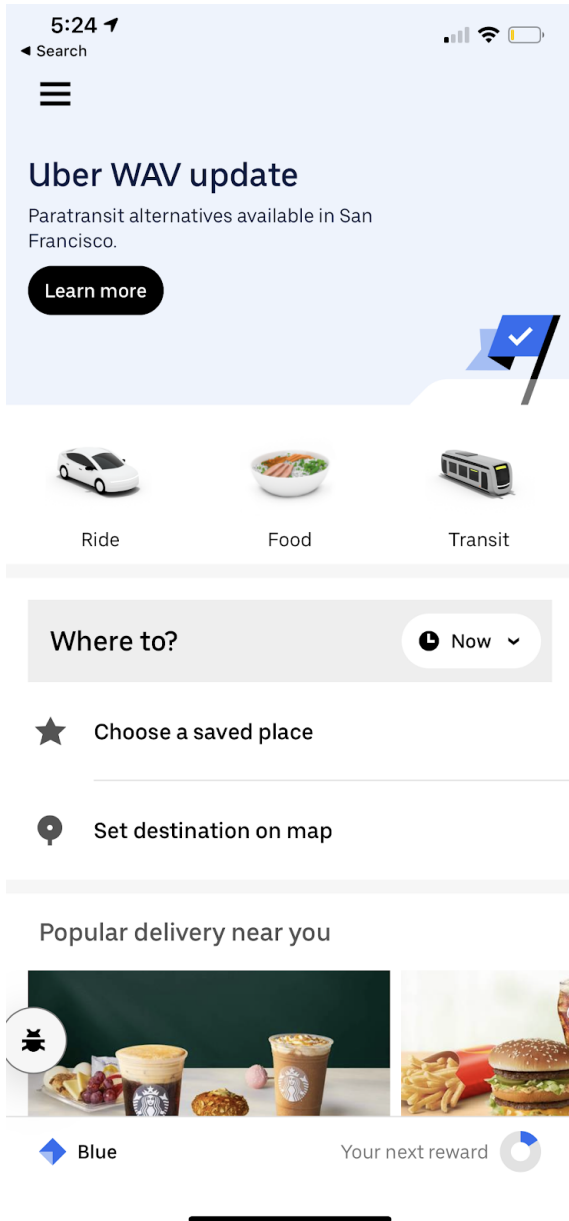
Uber Products Company Safety Help EN Log in Sign up

# 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.\*



### Section C: Consumer and Stakeholder Notifications: Bay Area Service Disruption



We're working to find alternative providers of on-demand WAV service for the San Francisco market; in the meantime, tap below for other paratransit options available in your area.

[SFMTA Paratransit](#)

SFMTA Paratransit is a third party provider. Uber is not responsible for products and services offered by third parties





# Temporary disruption to Uber WAV service in San Francisco

Hi Connor,

We want to let you know that, starting on September 1, you may experience longer wait times and/or limited or no availability when requesting an Uber WAV trip in or around San Francisco. This temporary disruption is due to the fact that the primary provider of wheelchair accessible vehicles on the Uber platform is leaving the San Francisco market.

We're working hard to find alternative providers of WAV service for the San Francisco market, and we remain committed to facilitating accessible transportation on the Uber platform.

You can expect to hear more from us once we have further updates on the situation. We're sorry for any inconvenience this may cause.



5:24  
Search

×

Paratransit | SFMTA

SFMTA

Alerts HeadsUp: This Monday, #LaborDay, #SFMuni service will operate on a Sunday schedule. Holiday parking enforcement det <https://t.co/N84MWayhLE> (More: 7 in last 48 hours)

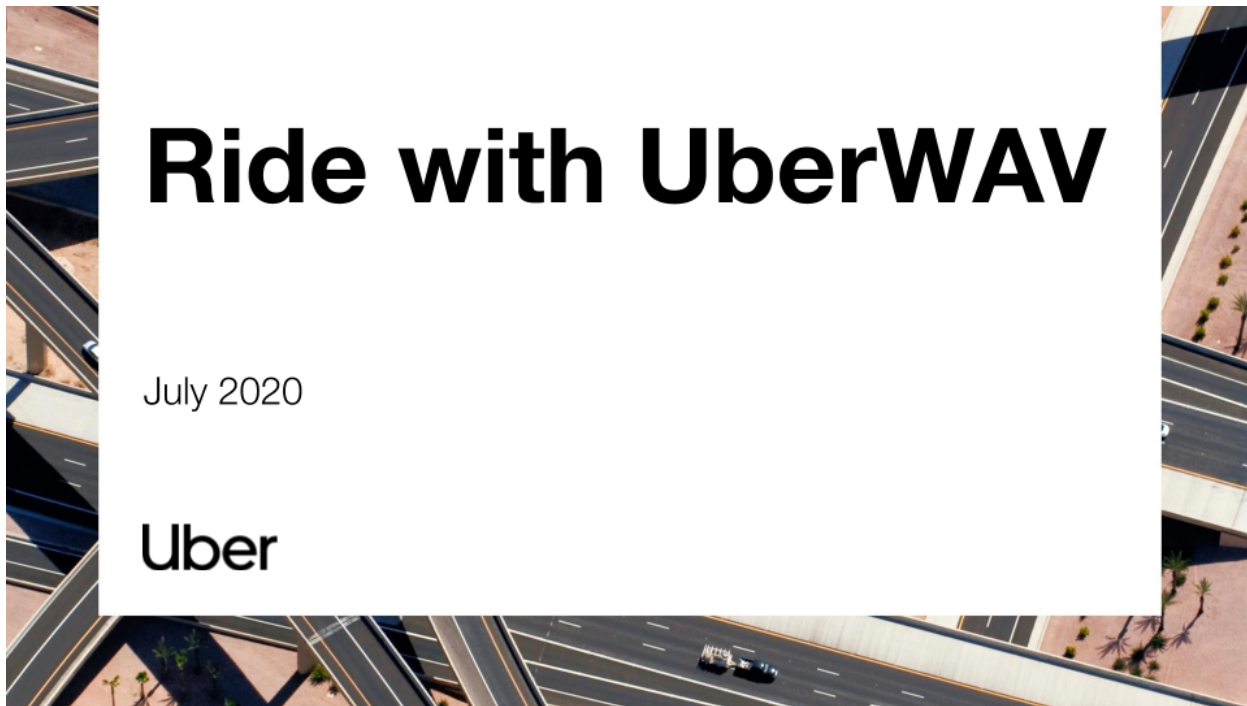
Subscribe

The [SFMTA COVID-19 page](#) has the latest service and citation information. / La [página SFMTA COVID-19](#) tiene la información más reciente sobre los servicios de tránsito y las citaciones. / 瀏覽[SFMTA COVID-19網頁](#),了解最新客運及罰單信息 / Ang [pahina ng SFMTA COVID-19](#) ay may pinakabagong impormasyon sa serbisyo at pagbanggit.

**Paratransit**  
and Taxi services for people with disabilities

Home / Getting Around / Accessibility  
/ Paratransit

**Section D: Ride with UberWAV Community Presentation**



# Ride with UberWAV

July 2020



## Intros

**Austin Heyworth**

California Public Affairs and Policy

**Christian Mendez**

UberWAV Outreach Team

Kearns & West

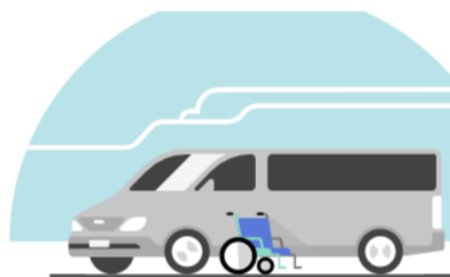
[cmendez@kearnswest.com](mailto:cmendez@kearnswest.com)

# Agenda

- 01** What is WAV?
- 02** Our accessible transportation partner
- 03** Safety
- 04** How to ride with UberWAV
- 05** Q&A

## What is WAV?

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





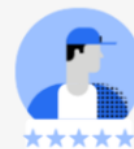
### Fast, reliable rides

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



### Trips that fit your budget

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



### Specialized drivers to assist you

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

## Our Partner



MV TRANSPORTATION, INC

### **MV Owned, Driver Operated**

All WAVs added to the Uber platform by MV are owned by MV and operated by their drivers. Every driver has a specialized Wheelchair Accessible Vehicle for transporting non-folding, motorized wheelchairs. Every MV driver completes both sensitivity and securement training prior to going online.

### **Uber Enabled**

Uber has invested heavily to price WAV trips the same as a similar UberX trip, and to support this program as it grows and scales.



**Leading innovations in on-demand mobility for people with disabilities.**

# Safety

Uber has implemented comprehensive health and safety standards for the protection of both riders and drivers, including:

- **“Go Online” Checklist and Mask Verification.** Before a driver can go online and become active, they will be asked to confirm, via a new Go Online Checklist, that they’ve taken certain safety measures and are wearing a mask or face cover.
- **Supplies for Riders and Drivers.** To assist with sanitization, Uber is dedicating \$50 million to purchase and distribute cleaning supplies and protective equipment to active drivers.
- **Accountability.** Accountability works best when it goes both ways. That’s why we’re encouraging drivers to cancel trips without penalty if they don’t feel safe, including if a rider isn’t wearing a face cover.

## How to ride with WAV

