

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## Consumer Protection and Enforcement Division

### Passenger Transportation Carrier Advice Letter (AL) Summary Form

#### PASSENGER TRANSPORTATION CARRIER FILER INFORMATION

Date of Submission: July 12, 2024	Date AL served on parties: July 12, 2024	
Carrier Name: Uber Technologies, Inc.	PSG #: 0038150-P	
DBA Name: Uber Technologies, Inc.		
Address: 1725 3rd Street		
City: San Francisco	State: CA	ZIP Code: 94158
Filer's Name: First, Last Justine Woodland		
Filer's Email: jwoodland@uber.com	Filer's Phone: (415) 494-7405	

#### AL INFORMATION

Advice Letter #: 28	Requested Effective Date: August 11, 2024	AL Tier: <input type="checkbox"/> I <input checked="" type="checkbox"/> II <input type="checkbox"/> III <input type="checkbox"/> Information Only
Subject of filing: Uber Technologies, Inc.'s Advice Letter 28		
Authorization for filing: Resolution #, Decision #, etc. D.20-03-007, D.21-03-005, D.21-11-004, and D.23-02-02		
Notes/comments: Other information & reference to advice letter, etc. Uber Technologies, Inc.'s Advice Letter No. 28 requesting an offset against the quarterly Access For All Fee payments collected for San Francisco County and Los Angeles County.		

#### SUBMISSION INFORMATION

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

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

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

Questions regarding the Clean Miles Standard Advice Letter filings, please email:  
[CleanMiles@cpuc.ca.gov](mailto:CleanMiles@cpuc.ca.gov)

Questions regarding the Transportation Network Companies general Advice Letter filings, please email:  
[Licensing\\_TNC@cpuc.ca.gov](mailto:Licensing_TNC@cpuc.ca.gov)



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

**July 12, 2024**  
**Uber Technologies, Inc.**  
**PSG0038150**  
**Advice Letter No. 28**

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. 28 (Q2 2024)**

**I. Offset Request**

Pursuant to Decisions (D.) 20-03-007, D.21-03-005, D.21-11-004, and D.23-02-024, Uber Technologies, Inc. (“Uber”) submits this Advice Letter No. 28 to request to offset Quarter 2 of 2024 TNC Access For All Fund<sup>1</sup> fee payments by the amounts Uber spent to improve wheelchair accessible vehicle (“WAV”) service in Quarter 2 of 2024. The requested effective date of this advice letter is August 11, 2024 (30 days from date of filing).<sup>2</sup>

The offset amounts requested by county<sup>3</sup> are as follows:

County	Offset Expenses (\$)	Percent Allowed (%) <sup>4</sup>	Offset Requested (\$)
ALAMEDA	\$ -	%	\$ -

County	Offset Expenses (\$)	Percent Allowed (%)	Offset Requested (\$)
ORANGE	\$ -	%	\$ -

<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> As a good faith participant in the TNC Access for All program, Uber submits this advice letter without any request for confidential treatment. While Uber maintains that certain information contained herein is commercially sensitive and constitutes protectable trade secrets, Uber submits this information unredacted in an effort to advance the goals of this program. Uber reserves its right to seek confidential treatment of this type of information in the future.

<sup>3</sup> Uber is not including San Mateo County in this offset request in light of the CPUC’s July 9, 2024 approval of Uber’s Advice Letter 23, which grants an exemption for San Mateo County from Quarter 2 of 2024 through Quarter 1 of 2025.

<sup>4</sup> D.23-02-024 OP6.

July 12, 2024  
 Uber Technologies, Inc.  
 PSG0038150  
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<b>ALPINE</b>	\$ -	%	\$ -
<b>AMADOR</b>	\$ -	%	\$ -
<b>BUTTE</b>	\$ -	%	\$ -
<b>CALAVERAS</b>	\$ -	%	\$ -
<b>COLUSA</b>	\$ -	%	\$ -
<b>CONTRA COSTA</b>	\$ -	%	\$ -
<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>PLACER</b>	\$ -	%	\$ -
<b>PLUMAS</b>	\$ -	%	\$ -
<b>RIVERSIDE</b>	\$ -	%	\$ -
<b>SACRAMENT O</b>	\$ -	%	\$ -
<b>SAN BENITO</b>	\$ -	%	\$ -
<b>SAN BERNARDINO</b>	\$ -	%	\$ -
<b>SAN DIEGO</b>	\$ -	%	\$ -
<b>SAN FRANCISCO</b>	\$583,780.40	100%	\$583,780.40
<b>SAN JOAQUIN</b>	\$ -	%	\$ -
<b>SAN LUIS OBISPO</b>	\$ -	%	\$ -
<b>SAN MATEO</b>	\$ -	%	\$ -
<b>SANTA BARBARA</b>	\$ -	%	\$ -
<b>SANTA CLARA</b>	\$ -	%	\$ -
<b>SANTA CRUZ</b>	\$ -	%	\$ -
<b>SHASTA</b>	\$ -	%	\$ -
<b>SIERRA</b>	\$ -	%	\$ -

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LASSEN	\$ -	%	\$ -
LOS ANGELES	\$1,710,826.60	100%	\$1,710,826.60
MADERA	\$ -	%	\$ -
MARIN	\$ -	%	\$ -
MARIPOSA	\$ -	%	\$ -
MENDOCINO	\$ -	%	\$ -
MERCED	\$ -	%	\$ -
MODOC	\$ -	%	\$ -
MONO	\$ -	%	\$ -
MONTEREY	\$ -	%	\$ -
NAPA	\$ -	%	\$ -
NEVADA	\$ -	%	\$ -
<b>Subtotal</b>	\$ -	%	\$ -

SISKIYOU	\$ -	%	\$ -
SOLANO	\$ -	%	\$ -
SONOMA	\$ -	%	\$ -
STANISLAUS	\$ -	%	\$ -
SUTTER	\$ -	%	\$ -
TEHAMA	\$ -	%	\$ -
TRINITY	\$ -	%	\$ -
TULARE	\$ -	%	\$ -
TUOLUMNE	\$ -	%	\$ -
VENTURA	\$ -	%	\$ -
YOLO	\$ -	%	\$ -
YUBA	\$ -	%	\$ -
<b>Subtotal</b>	\$ -	%	\$ -
<b>Total Offset Request</b>	<b>\$2,294,607.00</b>	<b>100%</b>	<b>\$2,294,607.00</b>

Per D.20-03-007, D.21-03-005, D.21-11-004, and D.23-02-024, Uber provides the following documents in support of its request as indicated in the summary table below:

<b>Criteria</b>	<b>Must Demonstrate</b>	<b>Documentation Included (Y/N)</b>
<b>1. Presence and availability of on-demand and pre-scheduled<sup>5</sup> WAVs<sup>6</sup></b>	(a) the number of WAVs in operation - by quarter and aggregated by hour of the day and day of the week; (b) the unique number of WAVs in operation – by quarter and by hour of the day and day of the week; and (c) the number and percentage of WAV trips completed, not accepted, cancelled by passenger, cancelled due to passenger no-show, and cancelled by driver – by quarter and aggregated by hour of the day and day of the week; (d) the total WAV trips requested and completed broken out by Census Tract; and (e) operating hours for each geographic area	<b>Y</b>

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

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

<p><b>2a. Improved level of service (on-demand WAVs)<sup>7</sup></b></p>	<p>Both the Offset Time and the Trip Completion Standards are satisfied:</p> <p>(a)(1) Offset Time Standard &amp; WAV Response Times<sup>8</sup>: Meet or exceed both the relevant Level 1 and Level 2 Response Time Benchmarks for a given quarter in a given geographic area within the Offset Response Time Benchmarks (ORTB). The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request in that quarter (see Table A)</p> <p>(b.1) Trip Completion Standard<sup>9</sup>: Meet or exceed the applicable minimum percentage of trip requests completed (see Table B), and</p> <p>(b.2) Either (i) a greater number of completed trips than in the immediately prior quarter, or (ii) a greater number of completed trips than in the immediately prior year’s same quarter, if sufficient data is available. A TNC may elect to be compared to this prior quarter or prior year’s same quarter, if applicable (see Table C). The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request.</p>	<p><b>Y</b></p>
<p><b>2b. Improved level of service (pre-scheduled WAVs)<sup>10</sup></b></p>	<p>Both the Pickup Delay Benchmark and the Trip Completion Standards are satisfied:</p> <p>(a) Pickup Delay Standard within the Pickup Delay Benchmark<sup>11</sup>: Meet or exceed both the relevant Response Time Benchmarks for a given quarter in a given</p>	<p><b>N/A</b></p>

<sup>7</sup> D.21-11-004 Ordering Paragraph 1-3, 6, and 7.

<sup>8</sup> D.21-11-004 Ordering Paragraph 1, 2, and 3.

<sup>9</sup> D.21-11-004 Ordering Paragraph 6 and 7.

<sup>10</sup> D.23-02-024 Ordering Paragraph 1-5.

<sup>11</sup> D.23-02-024 Ordering Paragraph 4.

	<p>geographic area within the Pre-scheduled Pickup Delay Benchmarks (PDB). The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request in that quarter (see Table D)</p> <p>(b.1) Pre-scheduled Trip Completion Standard<sup>12</sup>: Meet or exceed the applicable minimum percentage of trip requests completed (see Table E), and</p> <p>(b.2) Either (i) a greater number of completed trips than in the immediately prior quarter, or (ii) a greater number of completed trips than in the immediately prior year’s same quarter, if sufficient data is available. A TNC may elect to be compared to this prior quarter or prior year’s same quarter, if applicable (see Table F). The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request.</p>	
<p><b>3. Efforts to publicize and promote available WAV services<sup>13</sup></b></p>	<p>Evidence of outreach efforts such as a list of partners from disability communities, how the partnership promoted WAV services, and marketing or promotional materials of those activities, including but not limited to:</p> <p>(a) Submitted an annual outreach plan (due no later than July 1 of each year),</p> <p>(b) Information about disability access and WAV in general marketing campaigns,</p> <p>(c) Submit a quarterly report for each offset county on the following: Progress made towards implementing the outreach plan; The number of entities contacted; The method, nature, outcome of the contact; the number of partnerships developed; Efforts to publicize and promote WAV service in each offset county and whether efforts were</p>	<p><b>Y</b></p>

<sup>12</sup> D.23-02-024 Ordering Paragraph 5.

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

	<p>accessible to people with disabilities and limited English proficiency; Educational materials developed and distributed; and outcome of TNCs efforts to outreach and engage wheelchair users.</p> <p>Quarterly Report shall also address the following questions:</p> <ol style="list-style-type: none"> <li>1. What methods of engagement did the TNC find most effective and why?</li> <li>2. What common concerns/questions came up during the engagement process?</li> <li>3. What challenges have you encountered? How do you plan to overcome them?</li> </ol>	
<p><b>4. Full accounting of funds expended<sup>14</sup></b></p>	<p>Qualifying offset expenses are:</p> <ol style="list-style-type: none"> <li>(a) reasonable, legitimate costs that improve a TNC’s WAV service, and</li> <li>(b) incurred in the quarter for which a TNC requests an offset, and</li> <li>(c) on the list of eligible expenses attached as Appendix A, and</li> <li>(d) net of fare revenues collected from WAV service delivery in the quarter for which a TNC requests an offset<sup>15</sup></li> </ol>	<p><b>Y</b></p>
<p><b>5. Training and inspections<sup>16</sup></b></p>	<ol style="list-style-type: none"> <li>(a) certification of WAV driver training completion within the past 3 years, and</li> <li>(b) WAV driver training programs used per geographic area, and the number of WAV drivers that completed WAV training in that quarter, and</li> <li>(c) Certification of WAV inspection and approval</li> </ol>	<p><b>Y</b></p>

<sup>14</sup> D.20-03-007 Ordering Paragraph 10.

<sup>15</sup> D.21-11-004 Ordering Paragraph 9.

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



<b>6. Reporting complaints<sup>17</sup></b>	Number of complaints related to WAV drivers or services – by quarter and geographic area, and broken out by category: Securement Issues; Driver Training; Vehicle Safety and Comfort; Service Animal; Stranded Passenger, Pickup, Drop Off, and Other issues.	<b>Y</b>
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**Table A: Level 1 and Level 2 Offset Time Standards (percent) and ORTB (minutes) by County**

County	Q2 2024					TNC claims the data demonstrates meeting or exceeding % of completed trips and within ORTB for Level 1 and 2?
	# Quarter Submission (1st, 2nd, 3rd, ...8th)	Level 1 (%)	Level 1 (mins) <sup>18</sup>	Level 2 (%)	Level 2 (mins)	
Los Angeles	5th	76.43	17.03	95.68	24.37	Yes
San Francisco	8th	82.71	9.75	98.34	13.18	Yes

**Table B: Trip Completion Standard (part b.1)**

County	# Quarter Submission (1 <sup>st</sup> , 2 <sup>nd</sup> , 3 <sup>rd</sup> , ...8 <sup>th</sup> )	County Group A, Group B, or Group C?	Trip Completion Rate (%)	TNC claims the data demonstrates meeting the minimum % of trip requests completed?
Los Angeles	5th	B	64.08%	Yes
San Francisco	8th	A	78.61%	Yes

<sup>17</sup>D.23-02-024 Ordering Paragraph 13.

<sup>18</sup> Level 1 and Level 2 (mins) represent the applicable ORTB percentile for the appropriate quarter submission. Response time minutes for each decile is included in the file UBER\_2024Q1\_Response\_Times\_3.

**Table C: Trip Completion Standard (part b.2)**

County	Option 1 or 2 <sup>19</sup>	(1) # of completed trips previous quarter	(2) # of completed trips in the immediately prior year's same quarter	(1) # of completed trips this quarter	(2) # of completed trip this quarter
Los Angeles	1	10702	8331	13573	13573
San Francisco	1	2656	1807	3256	3256

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

County	Q2 2024			TNC claims the data demonstrates meeting or exceeding % of completed trips and within PDB?
	# Quarter Submission (1 <sup>st</sup> , 2 <sup>nd</sup> , 3 <sup>rd</sup> , ...8 <sup>th</sup> )	PDS (%)	PDB (mins)	
Los Angeles	N/A	N/A	N/A	N/A
San Francisco	N/A	N/A	N/A	N/A

**Table E: Pre-scheduled Trip Completion Standard (part b.1)**

County	# Quarter Submission (1 <sup>st</sup> , 2 <sup>nd</sup> , 3 <sup>rd</sup> , ...8 <sup>th</sup> )	County Group A, Group B, or Group C?	Pre-scheduled Trip Completion Standard (%)	TNC claims the data demonstrates meeting the minimum % of trip requests completed?
Los Angeles	N/A	B	N/A	N/A
San Francisco	N/A	A	N/A	N/A

<sup>19</sup> See D.21-11-004 Ordering Paragraph 6.

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

<b>County</b>	<b>Option 1 or 2<sup>20</sup></b>	<b>(1) # of completed trips previous quarter</b>	<b>(2) # of completed trips in the immediately prior year's same quarter</b>	<b>(1) # of completed trips this quarter</b>	<b>(2) # of completed trip this quarter</b>
<b>Los Angeles</b>	N/A	N/A	N/A	N/A	N/A
<b>San Francisco</b>	N/A	N/A	N/A	N/A	N/A

Per D.23-02-24<sup>21</sup>, Uber submits information on the on-demand and Pre-scheduled Service Mix as indicated in the table below.

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

<b>County</b>	<b># of On-Demand WAV Trips</b>	<b># of Pre-scheduled WAV Trips</b>	<b>% of On-Demand WAV trips out of the total Pre-scheduled WAV trips</b>	<b>% of Pre-scheduled WAV trips out of the total on-demand WAV trips</b>
<b>Los Angeles</b>	13573	0	100%	N/A
<b>San Francisco</b>	3256	0	100%	N/A

Per D.23-02-24<sup>22</sup>, Uber submits information on Wait and Save data as indicated in the table below.

<sup>20</sup> See D.23-02-024 Ordering Paragraph 5.

<sup>21</sup> See D.23-02-024 Ordering Paragraph 6.

<sup>22</sup> See D.23-02-024 Ordering Paragraph 11.

**Table H: Wait and Save**

County	# of WAV Wait & Save Trips	# of On-Demand WAV Trips	% of Wait & Save Trips out of the total on-demand WAV trips
Los Angeles	0	13573	0%
San Francisco	0	3256	0%

**WAV Operating Hours**

Any prospective passenger can request a WAV ride through Uber’s app 24 hours a day, 7 days a week in all counties (each geographic area) throughout California.

**II. Background**

In 2018, Senate Bill 1376, the “TNC Access for All Act,” was enacted by the California Legislature.<sup>23</sup> Public Utilities (“Pub. Util.”) Code § 5440.5 establishes a framework whereby Transportation Network Companies (“TNCs”) are permitted to offset against quarterly Access Fund fee payments for amounts spent by the TNC during the quarter to improve WAV service.<sup>24</sup>

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

**III. Accessibility at Uber**

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.

<sup>23</sup> S.B. 1376; *see also* Pub. Util. Code § 5440.5.

<sup>24</sup> Pub. Util. Code § 5440.5(a)(1)(B)(ii).

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

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

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

Riders who are deaf or hard of hearing: Audio is not needed for full functionality of the Uber app. Assistive technology such as visible and vibrating alerts can help riders who are deaf or hard of hearing use the Uber app easily, and in-app features, such as the ability to enter a destination, can facilitate non-verbal communication between the rider and driver.

Share your ETA and location: Riders can easily share their ride details, including the specific route and estimated time of arrival, with loved ones for extra peace of mind. Friends or family members will receive a link where they can see the driver's name, photo, and vehicle information, and track where the rider is on the map in real time until they arrive at their destination—all without downloading the Uber app.

When evaluating a TNC's efforts to increase access to third-party WAVs, Uber requests that the following be taken into consideration: compared to standard vehicles, WAVs have higher purchase prices; higher operating and maintenance costs; higher fuel costs; and higher insurance costs. Additionally, demand for WAV trips is extremely low, representing a very small fraction (less than 1%) of overall TNC demand.

Historically, Uber relied on drivers using their own WAVs to provide WAV services on the Uber platform. However, after observing the trends with individual-WAV ownership, Uber determined there were not enough individual WAV owners willing to make their WAVs available via the Uber app to service the public's demand, especially when geographic and temporal factors were taken into account.

Uber has invested significant capital to increase access to WAV service by partnering with third-party WAV providers. For example, in Quarter 2 of 2024, Uber spent over **\$3 million** on payments to third-party partners with WAVs.

In Quarter 2 of 2024, UberWAV service levels improved with Uber's ongoing partnership with Tower WAV LLC. Uber continues this partnership to further support program reliability across

the San Francisco Bay Area counties and Los Angeles county. Additionally, during the second quarter of 2024, Uber continued working to understand when and where WAV demand was coming from, and made significant operational improvements to strategically position WAV supply to best address that demand. These optimizations have resulted in increased reliability for WAV riders and an increase in completed WAV trips in the San Francisco Bay Area and Los Angeles.

Uber's ability to continue to invest heavily to expand WAV service is dependent on the expectation that it will recoup some of its costs through the Access for All program, especially upon a showing of very high reliability and performance. If the Access for All program's offset rules preclude Uber from qualifying for fee offsets, Uber will not be able to invest at the same levels.

#### **IV. Uber's Offset Request Advice Letter**

In accordance with D.20-03-007, D.21-03-005, D.21-11-004, and D.23-02-024, and the templates provided by the Commission, Uber provides the following supporting information: this Advice Letter "38150 Uber Technologies, Inc. AL 28 Forms," including Attachment A (Training and Inspections Declarations) and Attachment B (Outreach Quarterly Report); and the .csv files referenced below.

##### **1. WAVs in Operation**

Data for the WAVs in operation in Quarter 2 of 2024 is provided in the report "UBER\_2024Q2\_WAVS\_In\_Operation\_1a." Per the template provided by the Commission, the data is aggregated by hour of the day and day of the week for each county.

##### **2. Unique WAVs in Operation**

Data for unique WAVs in operation in Quarter 2 of 2024 for every county in which Uber requests (or previously requested) an offset is provided in the report "UBER\_2024Q2\_Unique\_WAVS\_In\_Operation\_1b." Per the template provided by the Commission, the data is aggregated by hour of the day and day of the week for each county.

##### **3. WAV Trips**

Data detailing WAV trips in Quarter 2 of 2024 for every county in which Uber requests (or previously requested) an offset is provided in the report "UBER\_2024Q2\_WAV\_Trips\_2." This

report includes data on the percentage, number, and Census Tract<sup>25</sup> of WAV trips completed, not accepted, canceled-no show,<sup>26</sup> canceled by passenger, canceled by driver, and cancellations within completed trips, cancellations within not completed trips, and unique trips, aggregated by the hour of the day and day of the week.<sup>27</sup>

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

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

Data for response times for completed WAV Trips, including Periods A and B, is provided in the report “UBER\_2024Q2\_Response\_Times\_3.” Data demonstrating that Uber has fulfilled the relevant Offset Time Standard percentages for Level 1 and Level 2 is provided in the report “UBER\_2024Q2\_OTS\_PDS\_4.”

Uber urges the Commission to take into consideration numerous factors when evaluating response times. First, coverage can vary across counties and providers, making comparisons difficult, if not impossible. For example, some providers may only offer service during certain time windows or in certain areas. These providers cannot be compared to a provider that offers service across an entire county 24 hours a day, 7 days a week. Second, the fact that WAVs are servicing trips in a reasonable time compared to alternative accessible options should weigh

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

<sup>26</sup> Uber cannot provide information regarding the number of WAV trips canceled due to passenger “no-shows” because there is insufficient reliable data to report. Attempting to collect data reflecting whether or not the reason for a cancellation is tied to a passenger not showing up would be susceptible to bias and other design issues, which would result in incomplete and inaccurate data collection. For those same reasons, a portion of driver cancellations may be due to rider “no-shows,” yet Uber cannot reasonably ascertain which portion of driver initiated cancellations this would account for. While Uber does not have reliable data to report for this category, for ease of the Commission’s analysis of Uber’s data files, Uber has entered “0” for this data rather than indicating “N/A.”

<sup>27</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\_Trips” row of the data file. Similar to previous instructions regarding counting trips, Uber has reported cancellations for the day and hour of the ultimate trip event.

considerably in the evaluation. Third, response times can be highly variable due to external factors such as seasonality, local or widespread emergencies, overall traffic patterns (e.g., rush hour), and business events such as onboarding of new third-party WAV service providers and implementation of 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.

### **5. Trip Completion Standard (TCS)**

Data demonstrating that Uber has fulfilled the Trip Completion Standard is provided in the report “UBER\_2024Q2\_TCS\_PTC5.”

Similar to response times, because coverage can vary across counties and providers, comparisons for metrics such as trip completion rate can be difficult, if not impossible. For example, some providers may only offer service during certain time windows or in certain areas. These providers cannot be compared to a provider that offers service across an entire county 24 hours a day, 7 days a week. Further, completion rates can be highly variable due to the same external factors which can impact response times.

### **6. Outreach**

Between April and June 2024 (Quarter 2 of 2024), Uber continued implementing its 2023-2024 Revised Annual Outreach Plan. Details of Uber’s efforts including 1) a narrative of its efforts, 2) a tracker documenting its quarterly efforts pursuant to its plan, 3) answers to questions set forth in D.23-02-024<sup>28</sup>, and 4) exemplar marketing materials are included as Attachment B.

Additional data detailing Uber’s outreach efforts is provided in the report “UBER\_2024Q2\_Outreach\_7.” In this report, there may be date ranges in the columns labeled “Date” that are associated with email and phone outreach. These ranges reflect the range of start dates of outreach for specific partners in that county for email and phone outreach.

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<sup>28</sup> See D.23-02-024 Ordering Paragraph 16.



## 7. WAV Training and Inspections

Information regarding WAV Driver Training is provided in the report “UBER\_2024Q2\_Training\_and\_Inspections\_8” and required certifications are provided within Attachment A. The number of WAV drivers that have completed training is assigned according to the physical location of the fleet partner’s office, as that is where the training takes place.

## 8. Complaints

Information regarding complaints related to WAV services for each geographic area is provided in the report “UBER\_2024Q2\_Complaints\_9.” In an effort to be comprehensive, some complaint information included may represent a situation unrelated to the actual quality of WAV service provided, such as inquiries regarding lost items and account or payment questions.

## 9. Accounting of Funds Expended

An accounting of certain funds expended in Quarter 2 of 2024 is included in the report “UBER\_2024Q2\_Funds\_Expended\_10.”

As indicated in the supporting documentation provided, Uber is investing a significant amount of money to enable increased access to WAVs. It is more expensive to maintain and incentivize WAV trips over UberX trips, and Uber must offer substantial incentives to our partners to make it financially viable for them to operate their WAVs on the Uber platform, given the substantially higher acquisition, operating, and maintenance costs incurred. Further, the amounts included herein are not exhaustive and represent only a subset of the capital expended to enable the WAV program. Simply put, the millions of dollars Uber has demonstrated it invests is intended to achieve an end goal of enabling access to accessible, on-demand transportation to the general population at a price, service level, and scale that simply is not commercially available anywhere else in the market today.

## 10. Contract Information

Information regarding contracts with service providers is included in the report “UBER\_2024Q2\_Contract\_Information\_11.” The “Duration” column identifies the total length of the contract that was in effect during the reporting quarter. The entry “All CA Counties” under the column “County” indicates that the provider associated with that entry is eligible to provide trips starting in all California counties.

\* \* \* \* \*

In compliance with General Order 96-B, we served a copy of this advice letter via email upon the parties identified on the attached R.19-02-012 service list on July 12, 2024. If there are any questions regarding this advice letter, please contact Alex Larro 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 Alex Larro 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 HAVE BEEN EXAMINED BY ME AND ARE TRUE, CORRECT AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.**

Respectfully submitted,

/s/ Alexander Larro

Alexander Larro  
Counsel, Regulatory  
Uber Technologies, Inc.

#### Attachments

1. Attachment A - Signed Training & Inspection Declarations (PDF)
2. Attachment B - Outreach Quarterly Report (PDF)
3. Data Attachments in CSV format (WAVs in Operation; Unique WAVs in Operation; WAV Trips; Response times; OTS/PDS; TCS/PTC; Outreach; Training and Inspections; Complaints; Funds Expended; and Contract Information)



California  
Public Utilities  
Commission



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## CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

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**LAST CHANGED: JULY 10, 2024**

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# **EXHIBIT A**

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

Carrier Name: Tower WAV LLC

PSG#: 39427-A

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

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

**CERTIFICATION**

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

Date: \_\_\_\_\_

7/2/24

Andres Munoz

Print Name of Applicant/Officer

Signature of Applicant(s)

Signature of Corporate Officer

Manager-COO

Title of Corporate Officer

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

Carrier Name: Tower WAV LLC

PSG #: 39427-A

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

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

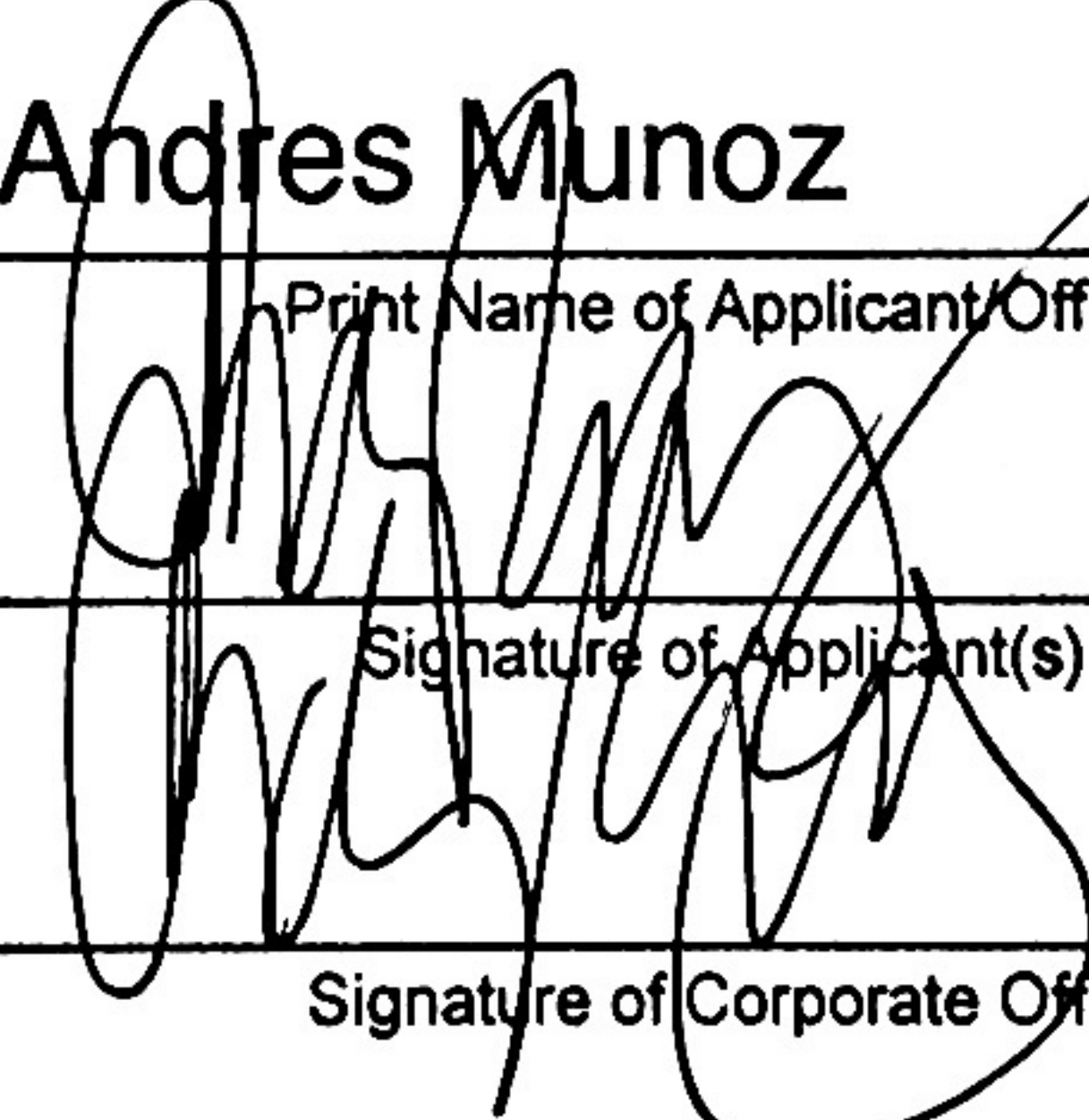
TNCs shall be responsible for ensuring that each of their WAV drivers complies with these requirements and shall maintain records of such compliance for the duration of the program which is scheduled to sunset on January 1, 2026.

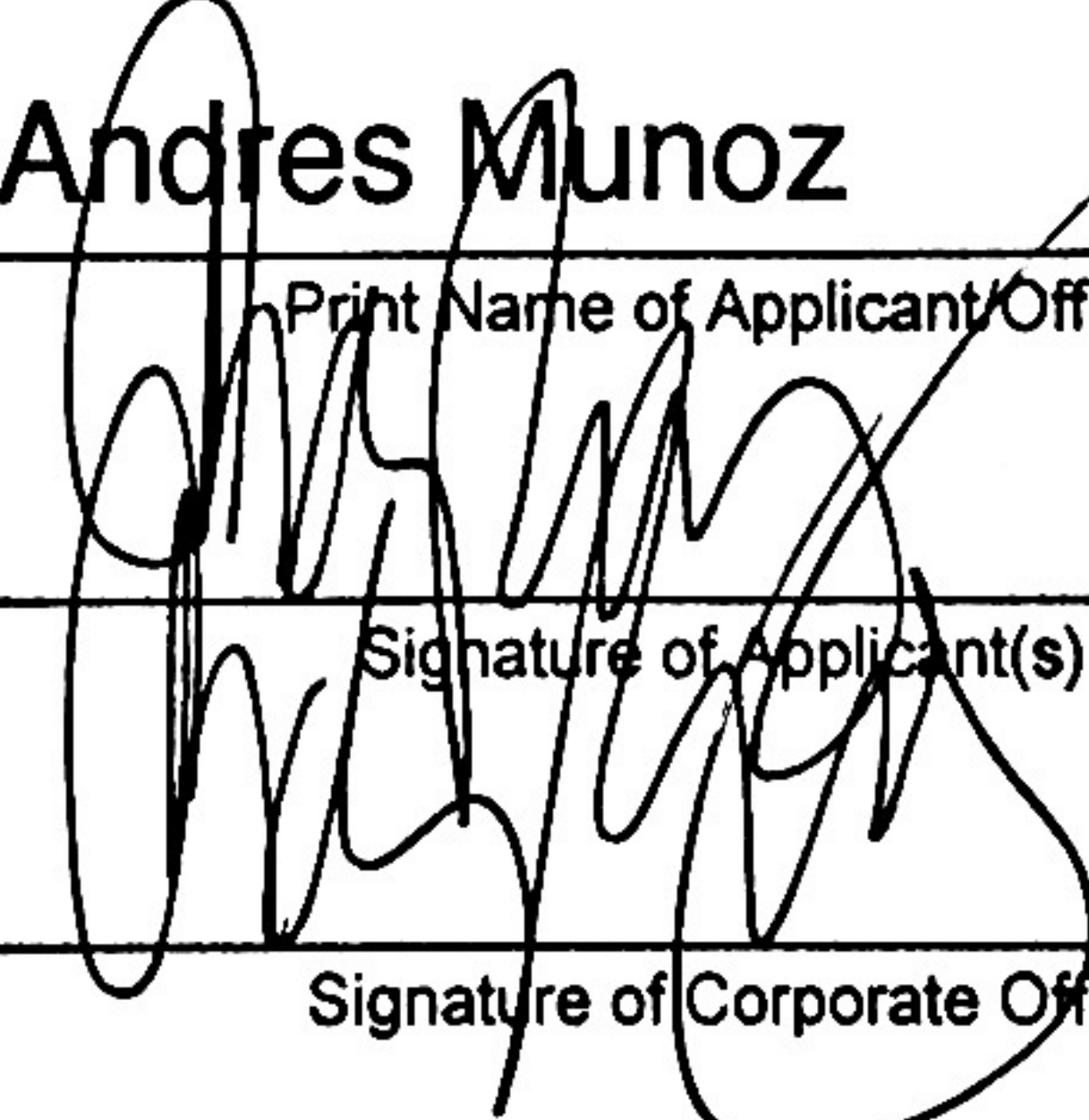
**CERTIFICATION**

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

Date: 7/2/24

Andres Munoz  
Print Name of Applicant/Officer

  
Signature of Applicant(s)

  
Signature of Corporate Officer

Manager-COO  
Title of Corporate Officer

# **EXHIBIT B**

## ATTACHMENT B

### Uber Technologies, Inc.'s Outreach Quarterly Report Quarter 2 2024

July 12, 2024

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In the second quarter of 2024, Uber Technologies, Inc. continued its efforts to enhance the outreach of the UberWAV (Wheelchair Accessible Vehicles) program. This initiative complies with the California Public Utilities Commission (CPUC) regulations under the TNC Access for All Act (SB 1376) and aligns with Uber's revised annual outreach plan as mandated by Decision (D.) 23-02-024, Ordering Paragraph 16, and Rule 6.1 of General Order 96-B.

Uber implemented a comprehensive outreach strategy, engaging both new and previously contacted organizations. During this quarter, Uber engaged in 107 interactions, including follow-up communications with 87 previously engaged organizations and initiating contact with 20 new organizations.

A key highlight of Q2 2024 was holding three focus group sessions. These sessions gathered diverse perspectives on accessibility needs, offering valuable insights into how UberWAV can better serve the community. Additionally, Uber conducted five presentations with various groups. These presentations communicated the benefits of the UberWAV service and gathered feedback from different stakeholders.

Uber's outreach strategy involved targeted communications with organizational staff. When contact information was available, Uber followed up emails with phone calls, resulting in higher response rates and more meaningful engagement. By directly addressing specific concerns and needs, Uber fostered more effective interactions and gained valuable insights into how the UberWAV program can better serve the community.

Looking ahead, Uber is committed to continuing its outreach initiatives. Uber plans to apply the feedback received during this quarter to enhance its engagement with communities and organizations. The goal is to ensure that the benefits and availability of the UberWAV service are clearly communicated and accessible to those who need it most.

### **Effective Engagement Methods:**

The most effective engagement methods involved direct calls and consistent, targeted interactions. Direct calls continue to yield positive results, and consistent, targeted interactions have proven valuable in building strong relationships. Additionally, asking organizations to connect Uber with other organizations that may benefit from this engagement has been very effective. For example, engagement with SCDD Bay Area led to recommendations to reach out to SCDD Los Angeles and the Contra Costa Ambassador Program, resulting in a focus group with these two organizations.

### **Common Concerns/Questions:**

Certain groups Uber engaged with in the Bay Area raised concerns about the availability and quality of UberWAV services in Alameda County. Common questions included the accessibility and inclusivity of UberWAV, the affordability of services for individuals with disabilities, and the operational logistics of accessing these services. There were also inquiries about driver training to ensure appropriate services, such as handling luggage and assisting passengers into the vehicle. These concerns highlight a demand for services that are not only physically accessible but also economically viable and seamlessly integrated into existing support frameworks.

### **Challenges:**

A notable challenge has been getting groups to fill out the follow-up survey after engagements. To address this, we plan to implement more personalized follow-up strategies and streamline the survey process to encourage higher participation rates. Another challenge was coordinating focus groups, as some organizations had members ready to participate but couldn't align their schedules. To resolve this, we will allow more time for planning and schedule focus groups further in advance to ensure better participation.

Key outreach activities in the second quarter of 2024 included:

- **Stakeholder Engagement:** In the second quarter, our focus remained on enhancing relationships with key stakeholders, including disability advocacy organizations, independent living groups, state agencies, veteran groups, and community service providers. We used a variety of communication channels, such as direct calls, emails, phone conversations, and interactive formats like focus groups and presentations, to ensure comprehensive and meaningful engagement. This quarter, we conducted three focus groups and delivered five presentations to various stakeholder groups, gathering valuable feedback and fostering collaborative relationships.
- **Outreach Efforts:** We conducted outreach to a total of 107 organizations, initiating dialogue with 20 new entities and engaging in 87 follow-up interactions. Our approach



included asking organizations to connect Uber with other groups that could benefit from our services.

- **Follow-Up Strategy:** The most impactful follow-up methods included direct phone calls and consistent, focused communications. Phone calls have consistently yielded positive outcomes, boosting engagement and response rates. Regular, focused interactions have been instrumental in cultivating strong relationships with organizational staff. Moreover, encouraging organizations to refer Uber to other potential partners has been highly successful. For example, collaboration with SCDD Bay Area led to referrals to SCDD Los Angeles and the Contra Costa Ambassador Program. This resulted in a fruitful focus group with both organizations, offering valuable insights and broadening our network. By maintaining these personalized and strategic follow-up methods, Uber can foster deeper connections and better understand community needs.
- **Post-Engagement Initiatives:** Following the focus groups and presentations, we pursued further engagement opportunities, including follow-up and continued engagement to identify other stakeholder groups. We also supported the production and dissemination of customized outreach materials for our partner organizations, providing additional opportunities to showcase the UberWAV service directly to potential users.
- **Social Media Influencer:** We engaged a wheelchair user and Instagram influencer (@rollwithguru) in the Southern California area to publish posts on his social media channels demonstrating the use of the UberWAV service. We are hopeful this form of popular marketing—including reposting the content on Uber social media channels—will increase awareness of the service in combination with Uber’s other efforts.

### **Speaking Engagements**

#### *Southern California Resource Services for Independent Living (SCRS-ILC)*

On June 27, 2024, Uber held a presentation and discussion with SCRS-ILC. During the meeting, Uber confirmed that UberWAV services are available 24/7 in several California counties. This broad availability ensures accessible transportation options for individuals with disabilities across these regions.

In response to questions raised by SCRS-ILC, Uber confirmed the availability of UberWAV in Sacramento, where SCRS-ILC recently opened an office, but noted that vehicle concentration could affect response times in less populated areas.

Uber also addressed inquiries about pricing, confirming that UberWAV matches the pricing of UberX rides, ensuring affordability, and that specialized training is provided for drivers to assist passengers with disabilities. Additionally, Uber discussed its proactive marketing efforts, including outreach to advocacy groups and partnerships with influencers from the disability advocacy community. The meeting concluded with plans for Uber to follow up regarding the August and November SCRS-ILC collaborative meetings, where Uber hopes to participate and

explore a more meaningful partnership to enhance accessible transportation options for the accessibility community.

#### *Golden Castle Adult Day Health Center (ADHC)*

On April 10, 2024, Uber conducted a presentation and engaged in a discussion with Golden Castle Adult Day Health Center (ADHC) to discuss UberWAV services and address specific concerns related to their population of seniors with disabilities and low-income medical recipients.

During the session, Golden Castle ADHC raised the issue that the cost of UberWAV services was significantly higher than paratransit options. They inquired about the possibility of creating a business account to secure different rates for their patients. Uber responded that while they were unsure about different rates, they could connect Golden Castle with Uber's business team to explore this further. They mentioned Uber's health B2B product, which collaborates with healthcare providers to offer rides for patients to and from appointments, with the healthcare provider covering the ride costs.

Another concern raised was about drivers canceling rides, an issue Golden Castle had experienced recently. Uber confirmed that it tracks both rider and driver cancellations and acknowledged the importance of this feedback, committing to pass it along to the operations team. Uber also strives to keep wait times below 20 minutes for every ride, emphasizing its commitment to improving service reliability.

The session concluded with plans to connect Golden Castle ADHC with Uber's business team for further discussions and to follow up with relevant materials, including a handout, a deck, and a survey to gather more detailed feedback.

#### *Pacific ADA*

On April 15, 2024, Uber engaged in a productive discussion with the Pacific ADA Center to explore potential collaborations and address specific transportation needs for the disability community. The Pacific ADA Center is dedicated to fostering partnerships between the disability and business communities, promoting full and unrestricted participation in society for persons with disabilities through education and technical assistance.

During the engagement, Uber and Pacific ADA Center discussed various strategies to enhance the accessibility and reliability of transportation services. Key topics included improving the availability of UberWAV services, addressing challenges faced by passengers with disabilities, and exploring ways to provide better support to both drivers and riders in the disability community.

The conversation also focused on the importance of education and training for drivers to ensure they are equipped to meet the needs of passengers with disabilities. Uber highlighted its ongoing

efforts to provide specialized training for drivers on assisting passengers with disabilities, including proper ingress and egress techniques and handling equipment.

#### *ADC Evergreen*

On April 18, 2024, Uber engaged in an in-depth discussion with Evergreen ADC, a family-owned and operated adult day care service, to explore potential transportation solutions tailored to their specific needs. This session was a follow-up to previous communications and aimed to delve deeper into understanding and addressing the transportation challenges faced by the organization. Evergreen ADC operates its transportation services internally and typically hires third-party vendors to meet their transportation needs. The discussion highlighted their limited reach and their interest in enhancing transportation capabilities.

Staff shared insights into current practices, where they transport program participants to community locations such as parks, libraries, and community centers using a small vehicle with one staff member accompanying four individuals. They expressed the need for vehicles that can accommodate more than one passenger, including passengers with disabilities. Several questions were raised about the various Uber services available, and Uber proposed the potential setup of a business account for the organization, enabling them to dispatch rides (UberWAV/Uber) for their clients and members. This discussion led to connecting them with the business team for further exploration.

Evergreen ADC inquired about the presence of cameras in Uber vehicles for safety and compliance. Uber clarified that while it is not a requirement, they encourage drivers to have cameras, and specific requirements for WAV vehicles will be followed up. Further discussions will be scheduled to address outstanding questions and operational details.

#### *Alameda County Transportation Commission (CTC)*

On May 2, 2024, Uber engaged in a discussion with Alameda County Transportation Commission (CTC) staff and consultants who work extensively on transit and accessibility issues. The discussion highlighted the significant challenges faced in ensuring the availability and quality of UberWAV services in Alameda County.

Alameda County presents unique difficulties due to its number of healthcare facilities, geographic size, and traffic, which complicate meeting response times and managing cancellation rates. Despite efforts to prioritize the WAV product, the county continues to prove challenging. Participants discussed ideas for increasing the supply of WAV vehicles and improving service quality.

The geographic layout and the concentration of healthcare facilities in Alameda County were noted as significant factors affecting service reliability. While Uber provides approximately 200 WAV trips per month in Alameda County, most of these trips occur within the metropolitan areas

of Oakland and San Leandro. This issue is compounded by the high demand from healthcare facilities, which impacts wait times.

Participants shared their personal experiences, highlighting the sporadic reliability of UberWAV services in the county. It was noted that the paratransit advisory committee frequently discusses these challenges. Despite grant and regular formula funding, the decentralized nature of transportation in Alameda County, with multiple bus systems and city programs, complicates service delivery.

Uber expressed interest in continuing the dialogue with Alameda CTC and offered to speak to their council to gather more feedback and address concerns. The conversation emphasized the need for a collaborative approach to enhance WAV services in Alameda County, with Uber committed to ongoing engagement and improvement efforts.

*State Council on Developmental Disabilities (SCDD) Bay Area and Los Angeles, and Contra Costa Specialty Health Ambassador Program*

On April 25, 2024 and May 16, 2024, Uber engaged with the State Council on Developmental Disabilities (SCDD) in both the Bay Area and Los Angeles, and the Contra Costa Specialty Health Ambassador Program to discuss the UberWAV services and address specific concerns related to the developmental disabilities community.

In the Bay Area session, the discussion focused on the barriers Uber faces in Alameda County compared to San Mateo County. One significant challenge is the high demand due to numerous healthcare facilities in Alameda County, discussed above. Participants also discussed potential solutions, such as working with Alameda transit and the city of Fremont to reserve WAV vehicles for on-demand use. During this engagement, it was recommended that Uber reach out to the Contra Costa Specialty Health Ambassador Program, which helps families with disabilities navigate the system, to explore potential collaborations for improving service delivery and accessibility.

In the Los Angeles focus group session, participants discussed several key issues, including the availability of UberWAV services in Los Angeles County, particularly in Glendale, and the potential expansion to Sacramento and San Diego. Uber explained that the demand in these areas is currently low, which affects fleet positioning, but it hopes to expand in the future. Participants were directed to the Uber website for information on UberWAV services. There were inquiries about the process for storing equipment and the liabilities for drivers. Uber assured that drivers are trained for proper ingress and egress and assist with loading equipment, emphasizing that UberWAV drivers help with everything, including handling luggage for passengers with special needs. A representative from the Contra Costa Specialty Health Ambassador Program joined this session, providing additional insights and discussing potential collaborative opportunities.

## **Program Information and Community Group Outreach**

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

To identify outreach opportunities that effectively reach disabled consumers, Uber has actively sought input from these stakeholders. To support these efforts, Uber has provided a California-specific instructional fact sheet on accessing UberWAV to stakeholder organizations and has prepared English, Spanish, and Mandarin versions of the sheet for distribution. (See Section B)

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

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

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



# Ride with UberWAV

October 2022

**Uber**

# Intros

**Seth Smith**

Manager, California Public Policy

seth.smith@uber.com

## Agenda

**01** What is WAV?

**02** How to ride with UberWAV

**03** SB 1376 (2018) Access For All

**04** Uber + Public Transit

**05** Q&A

# Accessibility using Uber

Our technology and the transportation provided by drivers has transformed mobility for many people with disabilities, and we're committed to continuing to develop technologies that support everyone's ability to easily move around their communities.



## Riders with disabilities

Uber's technology is helping to increase mobility and independence for riders with disabilities, with features and capabilities like these:



### Cashless payments

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



### On-demand transportation

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



### Upfront pricing

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



### Anti-discrimination policies

Every trip request a rider makes is automatically matched to a nearby driver by the Uber app, reducing opportunities for unlawful discrimination to interfere with the process of securing reliable, affordable transportation.



### Service animal policies

For riders who are blind or low-vision and may be traveling with service animals, Uber's Community Guidelines and Service Animal Policy clearly require drivers to comply with all applicable laws regarding the transportation of service animals.



### 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.



### Wait time fee waivers

Riders with disabilities, or individuals who frequently accompany riders with disabilities on trips, can request a waiver of wait time fees for their accounts by submitting a certification.



## Riders with mobility disabilities

We're using technology to make transportation more accessible and reliable for riders with mobility disabilities, including through WAV (wheelchair-accessible vehicles).

[Read more](#)



### Equipped vehicles

Uber's WAV lets riders who use non-folding motorized wheelchairs connect with drivers in wheelchair-accessible vehicles equipped with ramps or lifts.



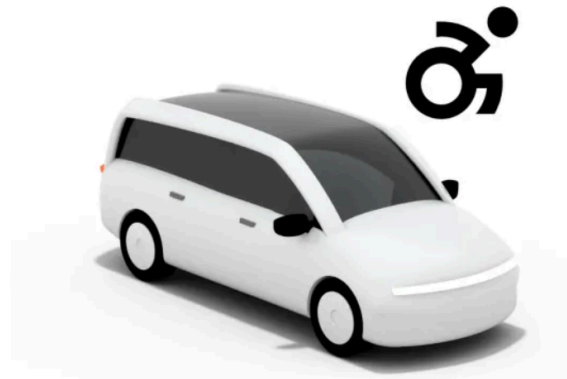
### Available around the world

We're using several WAV models in cities around the world (including Bangalore, Boston, Chicago, London, Los Angeles, New York, Philadelphia, San Francisco, Toronto, and Washington, DC) to determine which wheelchair-accessible vehicle options best meet the needs of riders and drivers.

## Uber 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.



## Why ride with Uber WAV



### Fast, flexible rides

When and where WAV is available, request a ride on demand that works around your life, not the other way around.



### Trips that fit your budget

The price of a WAV ride in the Uber app is comparable to UberX, our basic ride option.



### Specialized drivers to assist you

Every person driving with Uber WAV has completed a certification course offered by a third party to help you enter and exit the vehicle.\*

## How to ride with WAV

[Read more about how riding works](#)

### 1. Request

Open the app and enter your destination in the "Where to?" box. Once you confirm your pickup and destination addresses are correct, select WAV at the bottom of your screen (a promo code is required in some cities). Then tap **Confirm WAV**.

If a WAV driver is available and accepts your ride request, you'll see your driver's picture and vehicle details and can track their arrival on the map.

### 2. Ride

Check that the vehicle details match what you see in the app before getting in your WAV.

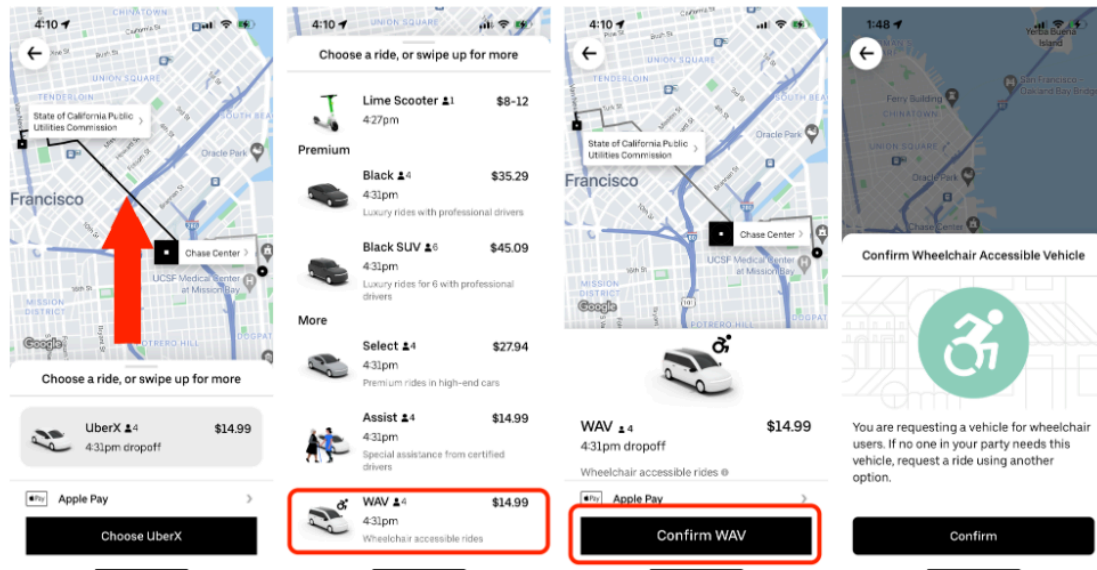
Your driver has your destination and directions for the fastest way to get there, but you can always request a specific route.

### 3. Exit the vehicle

You'll be automatically charged through your payment method on file, so you can exit your WAV as soon as you arrive.

Remember to rate your driver to help keep Uber safe and enjoyable for everyone.

## How to ride with WAV



## Intent of State Bill 1376

*“It is the intent of the Legislature that wheelchair users who need WAVs have prompt access to TNC services, and for the commission to facilitate greater adoption of wheelchair accessible vehicles on transportation network companies’ online-enabled applications or platforms.”*

SB 1376 (2018), Section 3 (adding Public Utilities Code Section 5440(j))

# TNC Remittance Offset: Quarterly Evaluation Criteria

## **Presence & Availability of Drivers with WAVs and Improved Level of Service**

- Hours of WAV service
- WAV drivers
- WAV Trips
- Response Time on WAV

## **Publicize WAV Services to the Disability Community**

- Efforts taken by TNC to publicize and promote WAV service to disability communities

## **Accounting of Funds Expended**

- Provide a statement of account for funds expended prepared in accordance with generally accepted accounting principles

# Q&A

# Thank you

Seth Smith ([seth.smith@uber.com](mailto:seth.smith@uber.com))

# Uber

## Section B: UberWAV Public Information Materials - Digital Fact Sheet

### Acceder a WAV con la aplicación Uber

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

Uber

#### Cómo solicitar un WAV

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

**Paso 2 →** Solicite su WAV

Imagen 1: Comience pidiendo un viaje como lo haría con cualquier otro viaje, asegurándose 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.

### Accessing WAV in the Uber App

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

Uber

#### How to Ride with WAV

**Step 1 →** Download the Uber App

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

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

### 在优步应用中访问 Uber WAV

在南加州和旧金山湾区的部分地区，乘客现可通过优步应用搭乘无障碍车辆

Uber

#### 如何搭乘 Uber WAV

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

**第 2 步 →** 预约 Uber WAV 第 2 步 (i) - (iv)

#### 经济实惠的无障碍车辆按需接载服务

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

与您的预算相符的行程  
Uber WAV 行程的收费与优选轿车行程相同。

专业司机为您提供帮助  
Uber WAV 司机需要完成由第三方提供的轮椅安全认证课程。

#### 关注 UberWAV

什么是 UberWAV？网站和常见问题 ([uber.com/ride/uberwav](https://uber.com/ride/uberwav))

优步首席执行官关于改善无障碍服务的信 (<https://ubr.to/uberwav>)

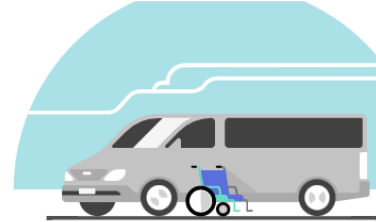
2021 年

## Section C: UberWAV Public Information Materials - Webpage

### WAV

WAV provides affordable rides in wheelchair-accessible vehicles, where available.

We're committed to developing solutions that support everyone's ability to easily move around their communities. Riders who use motorized wheelchairs or scooters can in certain cities\* request a ride in a wheelchair-accessible vehicle (WAV). WAV driver-partners are certified by a third party in safely driving and assisting people with disabilities.



[sign up to ride](#)

### Accessibility at Uber

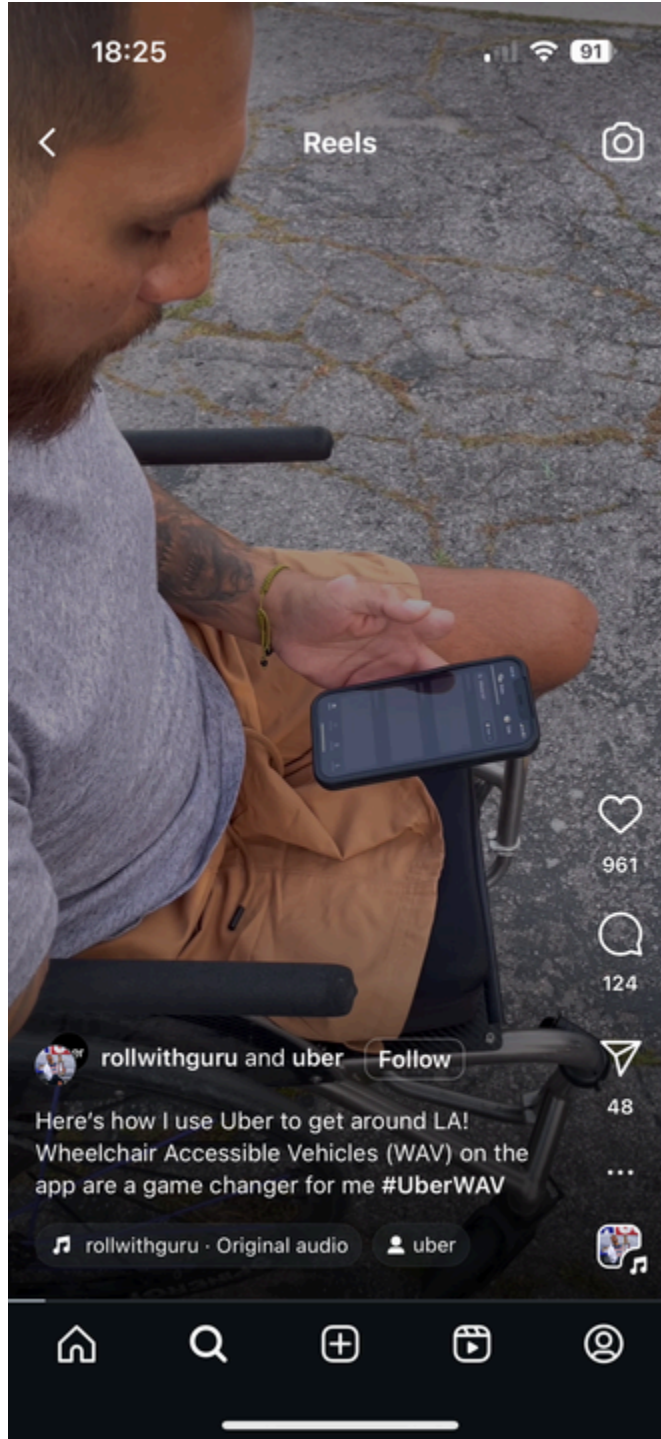
Our technology has transformed mobility for many people with disabilities, and we're committed to continuing to develop solutions that support everyone's ability to easily move around their communities.\*



**Section D: UberWAV Public Information Materials - Social Media Influencer Posts**

**Instagram Post:**

Partnership with social media influencer: @rollwithguru






## Section E: UberWAV Public Information Materials - Emails

Uber

### Ride on your time

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





[Request a trip →](#)



### Rides with you in mind

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

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

- **UberXL**  
Need room for an extra friend or luggage? Ride with UberXL.
- **Uber Comfort**  
Treat yourself to extra leg room on a personalized ride.
- **Uber Black**  
Business meeting or big night out? Get dropped off in luxury.
- **Uber WAV**  
Need a wheelchair accessible vehicle? Select Uber WAV.

[Try now >](#)

TCP 38150-P and TCP 38150-A

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

This is a promotional email from Uber Technologies  
3515 3rd St., San Francisco, CA 94158  
Uber.com

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

## Section F: UberWAV Progress Toward Quarterly Goals

	Objective / Quarter	Q2 2024
<b>1.1</b>	Conduct initial email outreach to at least 20 stakeholder groups per quarter	Email Outreach: 107 SGs contacted Presentation Outreach: 8 SGs contacted (including three focus groups)
<b>1.2</b>	Conduct at least 1 tailored follow-up meeting with responsive stakeholder groups per quarter (4 per year), highlighting UberWAV's features and addressing any specific questions from stakeholders or organizations.	<input checked="" type="checkbox"/>
<b>1.3</b>	Collect continuous feedback from stakeholder groups and riders in digital and virtual forms of engagement (via in-app support for riders, Uber's custom feedback form, email input).	<input checked="" type="checkbox"/>
<b>2.1</b>	Collaborate with local organizations on at least 1 joint outreach initiative per quarter (4 per year).	<input checked="" type="checkbox"/>
<b>2.2</b>	Conduct at least 1 focus group or listening session per quarter (4 per year) with representatives from non-traditional disability communities.	Uber hosted focus groups with the Alameda County Transportation Commission (CTC), the State Council on Developmental Disabilities (SCDD) in the Bay Area and Los Angeles, and the Contra Costa Specialty Health Ambassador Program. Discussions in Alameda County focused on challenges in providing reliable UberWAV services due to healthcare facility demands, geographic size, and traffic, exploring ideas to increase WAV vehicle supply. The Bay Area session with SCDD addressed barriers and potential collaborations with local transit authorities. The Los Angeles session discussed UberWAV availability in Los Angeles County and potential expansion to Sacramento and San Diego, emphasizing fleet positioning and driver training. All focus groups highlighted the importance of partnerships to enhance service delivery for the developmental disabilities community.
<b>2.3</b>	Engage at least 1 consultant specializing in stakeholder outreach and participation annually to optimize Uber's interaction strategies.	<input checked="" type="checkbox"/>
<b>3.1</b>	Provide multilingual materials in three primary languages (English, Spanish, Mandarin-Chinese) to disability advocacy groups in multi-ethnic communities where English is not the predominant language.	Yes: Uber has prepared materials in English, Spanish and Mandarin Chinese for distribution
<b>3.2</b>	Launch at least one mass email campaign per month highlighting UberWAV (with aim to reach at least 30,000 riders per quarter)	50,302 rider emails sent this quarter
<b>3.3</b>	Publish at least one piece of social media content per quarter promoting UberWAV (with aim to reach at least 100,000 impressions per quarter)	90,300 impressions through instagram post
<b>3.4</b>	Partner with a social media influencer once per year to raise awareness of UberWAV and accessibility issues more broadly	<input checked="" type="checkbox"/>
<b>4</b>	Monitoring and Evaluation	<input checked="" type="checkbox"/>
<b>Deliverable</b>	<ol style="list-style-type: none"> <li>1. What methods of engagement did the TNC find most effective and why?</li> <li>2. What common concerns/questions came up during the engagement process?</li> <li>3. What challenges have you encountered? How do you plan to overcome them?</li> </ol>	<p>During this period, Uber continued its outreach efforts, contacting a total of 107 organizations. This included 87 follow-up engagements with previously contacted organizations and outreach to 20 new entities. A key highlight of Q2 2024 was holding three focus group sessions. These sessions gathered diverse perspectives on accessibility needs, offering valuable insights into how UberWAV can better serve the community. Additionally, Uber conducted five presentations with various groups. These presentations communicated the benefits of the UberWAV service and gathered feedback from different stakeholders. Uber identified targeted and consistent interactions, such as direct calls to leaders and detailed focus groups, as the most effective engagement methods for building trust and addressing community needs. A common concern raised by Bay Area advocates centered on the availability and quality of UberWAV services in Alameda County. Common questions included the accessibility and inclusivity of UberWAV, the affordability of services for individuals with disabilities, and the operational logistics of accessing these services. These concerns highlight demand for services that are not only physically accessible but also economically viable and seamlessly integrated into existing support frameworks. A notable challenge has been getting groups to fill out the follow-up survey after engagements. To address this, we plan to implement more personalized follow-up strategies and streamline the survey process to encourage higher participation rates. Another challenge was coordinating focus groups, as some organizations had members ready to participate but couldn't align their schedules. To resolve this, we will allow more time for planning and schedule focus groups further in advance to ensure better participation.</p>