

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



**VIA ELECTRONIC MAIL**

October 4, 2024

Justine Woodland  
Uber Technologies, Inc.  
1515 Third Street  
San Francisco, CA 94158  
[jwoodland@uber.com](mailto:jwoodland@uber.com)

Subject: TNC Access for All Advice Letter 28 Disposition

Dear Justine Woodland,

Pursuant to Commission Decisions D.20-03-007, D.21-03-005, D.21-11-004, and D.23-02-024, the Consumer Protection and Enforcement Division (CPED) of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records. This status certificate indicates:

- AL Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of AL Filing
- Date Filed
- Disposition of Filing (Approved, Rejected, Withdrawn, etc.)
- Amount of Approved Offsets by County
- Effective Date of Filing

CPED did not receive any protests against AL 28.

Please review your AL filing with the information contained in the attached AL status certificate and the Appendix for a description of the AL, protest, and staff's disposition. If you have any questions on this matter, please contact CPED Staff via email at [tncaccess@cpuc.ca.gov](mailto:tncaccess@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Terra Curtis".

Terra Curtis  
Director, Consumer Protection and Enforcement Division

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**Advice Letter Status Certificate**

Status of Advice Letter 28 as of October 4, 2024

**Uber Technologies, Inc.** (TCP 38150)  
Attention: Justine Woodland  
1515 Third Street  
San Francisco, CA 94158

Advice Letter Subject: **Offset for Q2 2024 in compliance with Decisions D.20-03-007, D.21-03-005, D.21-11-004, and D.23-02-024**

Division Assigned: Consumer Protection and Enforcement

Date Filed: 7-12-2024

**Disposition: Approved**  
**Effective Date: 10-04-2024**

**Approved Offsets:**

COUNTY	APPROVED OFFSETS (\$)
LOS ANGELES	\$1,710,826.60
SAN FRANCISCO	\$583,780.40
<b>TOTAL OFFSET AMOUNT APPROVED</b>	<b>\$2,294,607.00</b>

CPUC Contact Information: [tncaccess@cpuc.ca.gov](mailto:tncaccess@cpuc.ca.gov)

TNC Contact Information: Justine Woodland  
[jwoodland@uber.com](mailto:jwoodland@uber.com)

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Appendix: Staff Review and Disposition

Background

In accordance with D.20-03-007, D.21-03-005, D.21-11-004, and D.23-02-024 Uber, Inc. (Uber) filed advice letter (AL) 28 on July 12, 2024 to request offsets against quarterly Access Fund payments for amounts it spent during the Second Quarter (Q2) of 2024 to improve wheelchair accessible vehicle (WAV) service. No parties filed protests or responses.

This disposition evaluates Uber’s compliance with offset requirements based on the dataset provided.

To qualify for an offset in a geographic area, a Transportation Network Company (TNC) must report the following in its quarterly AL filing: (1) presence and availability of WAVs; (2) improved level of service; (3) outreach efforts; (4) accounting of funds expended; (5) training and inspections; and (6) complaints related to WAV service. D.21-11-004 replaced the interim Offset Time Standard (OTS) framework adopted in D.20-03-007 (See [Table 2](#)), and replaced the Trip Completion Standard (TCS) framework adopted in D.21-03-005 (See

[Table 3](#)). [Table 1](#) below summarizes the evaluation criteria adopted in D.20-03-007, D.21-03-005, D.21-11-004, and D.23-02-024:

Table 1: Criteria for Evaluating Offsets

Evaluation Criteria	Must Demonstrate	Satisfied By
<b>1. Presence and availability of WAVs</b>	(a) the number of WAVs in operation - by quarter and aggregated by hour of the day and day of the week, and (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	Submission of the relevant data
<b>2a. Improved level of service (on-demand WAVs)<sup>1</sup></b>	Both the Offset Time and the Trip Completion Standards are satisfied:	Achievement of the Offset Time Standard <sup>2</sup> and Trip

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

<sup>2</sup> D.21-11-004, Ordering Paragraphs 1, 2, 3, and 4

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Evaluation Criteria	Must Demonstrate	Satisfied By
	<p>(a) (1) Offset Time Standard &amp; WAV Response Times: Meet or exceed both the relevant Level 1 and Level 2 Offset 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.</p> <p>(b.1) Trip Completion Standard: Meet or exceed the applicable minimum percentage of trip requests completed, 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. The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request.</p>	<p>Completion Standard<sup>3</sup></p>
<p><b>2b. Improved level of service (pre-scheduled WAVs)<sup>4</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>5</sup>: Meet or exceed both the relevant Response Time Benchmarks for a given quarter in a given 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</p> <p>(b.1) Pre-scheduled Trip Completion Standard<sup>6</sup>: Meet or exceed the applicable minimum percentage of trip requests completed, 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</p>	<p>Achievement of the Pickup Delay Benchmark and the Trip Completion Standards</p>

<sup>3</sup> D.21-11-004, Ordering Paragraphs 6, 7, and 8

<sup>4</sup> D.23-02-024 Ordering Paragraph 1-5

<sup>5</sup> D.23-02-024 Ordering Paragraph 4

<sup>6</sup> D.23-02-024 Ordering Paragraph 5

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Evaluation Criteria	Must Demonstrate	Satisfied By
	data is available. A TNC may elect to be compared to this prior quarter or prior year’s same quarter, if applicable. The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request.	
<p><b>3. Efforts to publicize and promote available WAV services<sup>7</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> <ul style="list-style-type: none"> <li>(a) Submitted an annual outreach plan (due no later than July 1 of each year),</li> <li>(b) Information about disability access and WAV in general marketing campaigns,</li> <li>(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 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. Quarterly Report shall also address the following questions:                             <ul 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> </ul> </li> </ul>	<p>Achievement of the outreach efforts provided in their annual outreach plan and submission of relevant data</p>
<p><b>4. Full accounting of funds expended<sup>8</sup></b></p>	<p>Qualifying offset expenses are:</p> <ul 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> </ul>	<p>Submission of the relevant data</p>

<sup>7</sup> D.20-03-007 Ordering Paragraph 9, and D.23-02-024 Ordering Paragraph 16

<sup>8</sup> D.20-03-007 Ordering Paragraph 10

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Evaluation Criteria	Must Demonstrate	Satisfied By
	(c) on the list of eligible expenses <sup>9</sup> attached as Appendix A (d) net of fare revenues collected from WAV service delivery in the quarter for which a TNC requests an offset <sup>10</sup> .	
<b>5. Training and inspections<sup>11</sup></b>	(a) certification of WAV driver training completion within the past 3 years, <sup>12</sup> (b) WAV driver training programs used per geographic area, and the number of WAV drivers that completed WAV training in that quarter, and (c) Certification of WAV inspection and approval <sup>13</sup>	Submission of the relevant data
<b>6. Reporting complaints<sup>14</sup></b>	(a) number of complaints related to WAV drivers or services – by quarter and geographic area, and broken out by category <sup>15</sup>	Submission of the relevant data

The Commission adopted standards for demonstrating improved level of service in D.20-03-007, D.21-03-005, D.21-11-004 (see [Table 2](#), and Table 3 below). The Commission in D.23-02-024 expanded outreach efforts a TNC must demonstrate (see above table “Efforts to publicize and promote available WAV services”) but did not set qualifying standards for the four other evaluation criteria. **As long as a TNC satisfies both the Offset Time and Trip Completion Standards for improved level of service, achieved outreach efforts, and submits all the required data showing WAV presence and availability, accounting of expended funds, training and inspections, and complaints related to WAV service, it is eligible to receive offsets and its advice letter will be approved.**

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<sup>9</sup> D.20-03-007, Appendix A

<sup>10</sup> D.21-11-004 Ordering Paragraph 9

<sup>11</sup> D.20-03-007 Ordering Paragraph 13 and 15(f), 15(g), and 15(h)

<sup>12</sup> Must include: sensitivity training, passenger assistance techniques, accessibility equipment use, door-to-door service, and safety procedures, D.20-03-007, Ordering Paragraph 13.

<sup>13</sup> Should state that WAVs conform with the Americans with Disabilities Act Accessibility Specifications for Transportation Vehicles within the past year, D.20-03-007, Ordering Paragraph 13.

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

<sup>15</sup> Categories include securement issue, driving training, vehicle safety and comfort, service animal issue, stranded passenger, pickup, drop off, and others, D.23-02-024, Ordering Paragraph 13.

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Table 2: On-Demand WAV Offset Response Times and Offset Time Standard

Geographic Area/County	Level 1 WAV Response Time (mins)	Level 2 WAV Response Time (mins)
<b>Group A</b> San Francisco	15	30
<b>Group B</b> San Diego, Santa Clara, Alameda, Sacramento, Contra Costa, Ventura, San Joaquin, Stanislaus, Santa Barbara, Solano, San Luis Obispo, Santa Cruz, Shasta, Imperial, Madera Los Angeles, Orange County, San Mateo	25	50
<b>Group C</b> Riverside, San Bernardino, Fresno, Kern, Sonoma, Tulare, Monterey, Placer, Merced, Marin, Butte, Yolo, El Dorado, Napa, Humboldt, Kings, Nevada, Sutter, Mendocino, Yuba, Lake, Tehama, San Benito, Tuolumne, Calaveras, Siskiyou, Amador, Glenn, Del Norte, Lassen, Colusa, Plumas, Inyo, Mariposa, Mono, Trinity, Modoc, Sierra, Alpine	30	60

Offset Time Standard (OTS)	Level 1 Offset Service	Level 2 Offset Service
1 <sup>st</sup> Quarter Submission	50%	80%
2 <sup>nd</sup> Quarter	54%	81%
3 <sup>rd</sup> Quarter	57%	83%
4 <sup>th</sup> Quarter	61%	84%
5 <sup>th</sup> Quarter	64%	86%
6 <sup>th</sup> Quarter	68%	87%
7 <sup>th</sup> Quarter	71%	89%
8 <sup>th</sup> (and subsequent) Quarter	75%	90%

Table 3: On-Demand WAV Trip Completion Standard

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Trip Completion Standard	County Group A	County Group B	County Group C
1 <sup>st</sup> Quarter Submission	50%	50%	50%
2 <sup>nd</sup> Quarter	54%	53%	51%
3 <sup>rd</sup> Quarter	57%	56%	53%
4 <sup>th</sup> Quarter	61%	59%	54%
5 <sup>th</sup> Quarter	64%	61%	56%
6 <sup>th</sup> Quarter	68%	64%	57%
7 <sup>th</sup> Quarter	71%	67%	59%
8 <sup>th</sup> (and subsequent) Quarter	75%	70%	60%

Trip Completion Standard	Must meet at least one of:	
	Number of Completed Trips (Option 1)	Number of Completed Trips (Option 2)
Beginning Q2 2022	Improvement (higher) than prior quarter	Improvement (higher) than prior year's same quarter if sufficient data is available.

Table 4: Pre-scheduled WAV Pickup Delay Benchmark and Standard

Geographic Area/County	Pre-scheduled WAV Response Time (mins)
<b>Group A</b> San Francisco	8
<b>Group B</b> San Diego, Santa Clara, Alameda, Sacramento, Contra Costa, Ventura, San Joaquin, Stanislaus, Santa Barbara, Solano, San Luis Obispo, Santa Cruz, Shasta, Imperial, Madera, Los Angeles, Orange County, San Mateo	13
<b>Group C</b> Riverside, San Bernardino, Fresno, Kern, Sonoma, Tulare, Monterey, Placer, Merced, Marin, Butte, Yolo, El Dorado, Napa, Humboldt, Kings, Nevada, Sutter, Mendocino, Yuba, Lake, Tehama, San Benito, Tuolumne, Calaveras, Siskiyou, Amador, Glenn, Del Norte, Lassen, Colusa, Plumas, Inyo, Mariposa, Mono, Trinity, Modoc, Sierra, Alpine	15



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Pre-scheduled Pickup Delay Standards (PDS)		
Percentage of Completed Trips under Pickup Delay Benchmarks		
1 <sup>st</sup> Quarter Submission	50%	80%
2 <sup>nd</sup> Quarter	54%	81%
3 <sup>rd</sup> Quarter	57%	83%
4 <sup>th</sup> Quarter	61%	84%
5 <sup>th</sup> Quarter	64%	86%
6 <sup>th</sup> Quarter	68%	87%
7 <sup>th</sup> Quarter	71%	89%
8 <sup>th</sup> (and subsequent) Quarter	75%	90%

Table 5: Pre-scheduled WAV Trip Completion Standard

Pre-scheduled Trip Completion Standard	County Group A	County Group B	County Group C
1 <sup>st</sup> Quarter Submission	90%	80%	65%
2 <sup>nd</sup> Quarter	90%	81%	67%
3 <sup>rd</sup> Quarter	90%	82%	70%
4 <sup>th</sup> Quarter	90%	83%	73%
5 <sup>th</sup> Quarter	90%	84%	76%
6 <sup>th</sup> Quarter	90%	86%	79%
7 <sup>th</sup> Quarter	90%	88%	82%
8 <sup>th</sup> (and subsequent) Quarter	90%	90%	85%

**Discussion****A. Offset Requirements**

To qualify for an offset, a TNC must demonstrate improved level of service by satisfying both the Offset Time Standard (OTS) and Trip Completion Standard (TCS) established in Decisions D.20-03-007, D.21-03-005, and D.21-11-004. Ordering Paragraph 1 in D.21-11-004 provides the requirements that must be satisfied to meet the OTS:

*To demonstrate improved level of service for offset eligibility, a Transportation Network Company (TNC) must demonstrate that it met or exceeded both the relevant Level 1 and Level 2 Response Time Benchmarks for a given quarter in a given geographic area. The 1<sup>st</sup> quarter percentages shall apply to the first quarter that a TNC submits an Offset Request in a given county. Once the schedule begins for a TNC in a given county, the schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request in that quarter.*

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This means that a TNC must demonstrate first that it meets Level 1 and 2 response time benchmarks for that county (first test), and second, it must meet the minimum percentage of completed trips beginning the first quarter that a TNC submits an Offset Request in a given county (second test). Once the schedule begins in a given county, the schedule will advance each quarter regardless of whether a TNC submits an Offset Request for that quarter.

Ordering Paragraph 6 in D.21-11-004 replaced the TCS framework adopted in D.21-03-005, effective starting the second quarter of 2022 (applicable to this advice letter), which requires a TNC to meet the minimum percentage of trip requests completed (third test), and increase the number of completed WAV trips (fourth test):

*To demonstrate improved level of service for offset eligibility, a TNC must demonstrate that it met or exceeded:*

*(a) The applicable minimum percentage of trip requests and completed, and*

*(b) Either: (a) a greater number of completed trips than in the immediately prior quarter, or (b) 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 the prior quarter or prior year's same quarter, if applicable.*

**B. Review of Offset Requests**

Uber's AL 28 requested offsets for on-demand WAV service in Q2 2024 totaling \$2,294,607.00 in two counties. [Table 6](#) and [Table 7](#) below summarize the Q2 2024 Offset Time Standard (response times and OTS percentages), while [Table 8](#) and

[Table 9](#) summarizes the Trip Completion Standard (percentages and numbers) reported for each geographic area eligible for offsets.

The review of AL 28 showed that Uber satisfied both the first and second tests for on-demand WAV service as its response times and OTS percentages for on-demand WAV service in Los Angeles and San Francisco counties met the Level 1 and 2 benchmarks (see [Table 6](#) and [Table 7](#)). It also satisfied the third and fourth tests in both counties as the percentage of trip requests that were ultimately completed met the minimum benchmarks, and the number of completed trips in both counties resulted in a greater number of completed trips compared to the previous quarter and the prior year's same quarter (see [Table 8](#) and

[Table 9](#)).

Finally, Uber satisfied the other requirements by submitting the required information regarding WAV presence and availability, outreach efforts, full accounting of funds expended, complaints related to WAV service, and training and inspections.

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Uber did not request offsets for pre-scheduled WAV service.

**C. Disposition of AL 28**

After review of AL 28, Staff concludes that Uber complied with all offset eligibility requirements for on-demand WAV service in D.20-03-007, D.21-03-005, and in D.21-11-004 for the counties of Los Angeles and San Francisco, as summarized in Tables 6-13 below. Uber did not provide pre-scheduled WAV service and did not seek offsets. Therefore, Uber’s AL 28 is approved, effective October 4, 2024. The approved total offset amount is \$2,294,607.00. Consistent with D.20-03-007, Uber shall submit the Q2 2024 Quarterly Report for the counties of Los Angeles and San Francisco within 7 days following the issuance of this disposition.

Table 6: Uber’s On-Demand WAV Level 1 and 2 Response Times (minutes) by County in Q2 2024

County	Benchmark (minutes)		Q2 2024 (minutes)		Within Benchmark?
	Level 1	Level 2	Level 1	Level 2	
LOS ANGELES	25	50	17.03	24.37	Yes (Level 1 and 2)
SAN FRANCISCO	15	30	9.75	13.18	Yes (Level 1 and 2)

Table 7: Uber’s On-Demand WAV Level 1 and 2 Offset Time Standards (percent) by County in Q2 2024

County	# Quarter Submission	Benchmark (OTS %)		Q2 2024 (OTS %)		Meeting or Exceeding %?
		Level 1	Level 2	Level 1	Level 2	
LOS ANGELES	5 <sup>th</sup>	64%	86%	76.4%	95.7%	Yes (Level 1 and 2)
SAN FRANCISCO	8 <sup>th</sup>	75%	90%	82.7%	98.3%	Yes (Level 1 and 2)

Table 8: Uber’s On-Demand WAV Trip Completion Standards by County in Q2 2024 (part b.1)

County	# Quarter Submission	Benchmark (TCS)		Q2 2024 (TCS %)	Meeting the Minimum %?
		County	TCS (%)		
LOS ANGELES	5 <sup>th</sup>	B	61%	64.1%	Yes
SAN FRANCISCO	8 <sup>th</sup>	A	75%	78.6%	Yes

Table 9: Uber’s On-Demand WAV Trip Completion Standards by County in Q2 2024 (part b.2)

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County	Option 1 or 2	(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 trips this quarter	Meeting or Exceeding #?
LOS ANGELES	1	10,702	8,331	13,573	13,573	Yes (1 & 2)
SAN FRANCISCO	1	2,656	1,807	3,256	3,256	Yes (1 & 2)

Table 10: Uber's Pre-scheduled WAV Response Times (minutes) by County in Q2 2024

County	Benchmark (PDB minutes)	Q2 2024 (minutes)	Within Benchmark?
LOS ANGELES	NA	NA	NA
SAN FRANCISCO	NA	NA	NA

Table 11: Uber's Pre-scheduled WAV Pickup Delay Standards (percent) by County in Q2 2024

County	# Quarter Submission	Benchmark (PDS %)	Q2 2024 (PDS %)	Meeting or Exceeding %?
LOS ANGELES	NA	NA	NA	NA
SAN FRANCISCO	NA	NA	NA	NA

Table 12: Uber's Pre-scheduled WAV Trip Completion Standards by County in Q2 2024 (part 2b. b.1)

County	# Quarter Submission	Benchmark (PTCS)		Q2 2024 (PTCS %)	Meeting the Minimum %?
		County	TCS (%)		
LOS ANGELES	NA	NA	NA	NA	NA
SAN FRANCISCO	NA	NA	NA	NA	NA

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Table 13: Uber's Pre-scheduled WAV Trip Completion Standards by County in Q2 2024 (part 2b. b.2)

County	Option 1 or 2	(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 trips this quarter	Meeting or Exceeding #?
LOS ANGELES	NA	NA	NA	NA	NA	NA
SAN FRANCISCO	NA	NA	NA	NA	NA	NA