



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking on)
Regulations Relating to Passenger)
Carriers, Ridesharing, and New)
Online-Enabled Transportation Services)
_____)

Docket No. R.12-12-011

COMMENTS TO CPUC ORDER INSTITUTING RULEMAKING
FILED ON BEHALF OF THE
INTERNATIONAL ASSOCIATION OF TRANSPORTATION REGULATORS

These comments are submitted on behalf of the International Association of Transportation Regulators (“IATR”) to address the issues raised by the California Public Utilities Commission (the “CPUC” or the “Commission”) in the above-titled rulemaking proceeding.

IATR is a peer group of taxi, limousine and for-hire transportation regulators from around the world, dedicated to improving the practice of licensing, enforcement and administration of for-hire transportation through the sharing of information and resources. Member jurisdictions include taxi and limousine commissions from various jurisdictions with the sole responsibility for the governance and control of for-hire transportation licensing and enforcement; police departments and other law enforcement agencies with the responsibility of administering and enforcing for-hire transportation regulations and consumer protection; transportation agencies with responsibility for public safety and service quality; and airport authorities that regulate airport ground transportation.

We submit these comments because the issues addressed in these proceedings are critically important to all IATR members. The specific businesses at issue here started in San Francisco, but they are rapidly spreading to other cities in the United States and have made known their plans to expand internationally. The existing businesses have been rigorous in their avoidance of all contact with regulators in every City in which they already operate, making it impossible to work with them to resolve the glaring issues of safety and service that are obvious to us. Instead, they simply announce that they are perfectly legal and then proceed to do business in defiance of all legal orders against them. We believe it is important to clearly and appropriately resolve the issues presented here in California before these dangerous and irresponsible practices proliferate across the country.

3.1 JURISDICTION

Some of these smart phone app providers argue that the Public Utilities Code's definition of "ridesharing" creates a space in which they can legally operate without being licensed as charter-party carriers of passengers.¹ For example, they cite to their "voluntary suggested donation" to demonstrate that they are not operating for "profit". Under the Commission's authority, we urge you to adopt regulations and recommend legislation that draws a more distinct definition of ridesharing versus for-hire vehicle service. As the OIR highlights, vehicles providing ridesharing services, as defined in the California Public Utilities Code, between home and work locations and common destinations; are exempted from CPUC regulation, so long as the primary purpose for the transportation of those persons is NOT to make a "profit".² Further information should be collected to determine whether these companies pay their affiliated drivers, and if so, how much. It was advertised, for example, that on New Year's Eve, one of the companies matched all "donations" earned that night in order to encourage drivers to give up their personal New Years' plans and provide transportation services that night. Further information should also be collected as to the amount of "donations" that are collected by drivers, and what percentage of revenue these companies take from such "donations". Only then can the Commission truly determine whether these companies are indeed operating without "profit". The Commission should use its authority to perform investigations of such companies to ensure compliance with existing regulations.

If collecting a profit, these companies are subject to the Commission's existing regulations related to charter party carriers, including the required fare rates (based on vehicle mileage, or time of use, or a combination of the two)³; the prohibition against charging "individual fares"; and requirements for liability insurance and property damage insurance⁴.

¹ For-hire passenger carriers include limousines, defined as any sedan or sport utility vehicle, of either standard or extended length, with a seating capacity of fewer than eleven (11) passengers including the driver. For the purposes of this memorandum, we assume the vehicles used by Lyft and SideCar meet the State definition for limousines, although we again note that any properly registered vehicle may provide "ridesharing" services for both companies. <http://www.cpuc.ca.gov/NR/rdonlyres/42294D2B-412E-466E-A74B-F1862BFC6924/0/PassengerCarriersBasicInfoandApplicantsRev012811.pdf>

² California Public Utilities Code Section 5353(h).

³ <http://www.cpuc.ca.gov/NR/rdonlyres/42294D2B-412E-466E-A74B-F1862BFC6924/0/PassengerCarriersBasicInfoandApplicantsRev012811.pdf>

⁴ For example, for a Class C charter-party carrier certificate, the following minimum liability insurance requirements apply (based on vehicle seating capacity, not including the driver): 7 passengers or less - \$750,000; 8 through 15 {10809371:9}

Drivers affiliated with such companies, like all livery drivers, should have the proper registrations including enrolling in the DMV Employer Pull Notice Program⁵ and enrollment in a drug testing program.⁶ In addition, and as discussed *infra*, the Commission should consider the recommendation of additional legislation specifically related to ridesharing to address this nuanced form of for-hire transportation service. The Commission should require companies that “administer” or “coordinate” true ridesharing services to register with the Commission, if not apply for a permit, to ensure that proper oversight may be provided. This will also allow for the Commission to confirm whether such companies do in fact qualify for the ridesharing regulatory exemption.

Moreover, companies that operate for-profit, and that use smartphone applications (“apps”) that directly connect passengers to drivers, clearly fall under the Commission’s definition of a charter-party carrier, and should be subject to all of the aforementioned existing regulations as well as such additional potential rulemaking as the Commission deems necessary.

3.2. SAFETY

Upon information and belief, these app providers have minimal safety standards regarding driver qualifications, vehicle requirements, and customer service. Any California registered vehicle with valid insurance may be used to provide transportation services for some of these transportation operators, and any person with a driver’s license may become a driver.⁷ These app providers claim to conduct background checks on all drivers. However, absent direct regulation, it is unknown whether or to what extent background checks are actually performed. The driver is essentially a stranger to the passengers. These drivers cruise around the city seeking to pick up passengers, in the same manner as taxis, in order to make money. Drivers have control over the route of transportation, like charter-party carriers⁸, and also request a fare in the form of a “suggested donation”. If operating like every other for-hire vehicle service in

passengers - \$1,500,000; 16 passengers or more - \$5,000,000. See <http://www.cpuc.ca.gov/PUC/transportation/FAQs/psvfaq.htm>.

⁵ The DMV Employer Pull Notice Program provides employers and regulatory agencies with a means of promoting driver safety through ongoing review of driver records.

⁶ See Title 13 of the California Code of Regulations for requirements.

⁷ <http://www.side.cr/#drive>

⁸ <http://www.cpuc.ca.gov/NR/rdonlyres/42294D2B-412E-466E-A74B-F1862BFC6924/0/PassengerCarriersBasicInfoandApplicantsRev012811.pdf>
{10809371:9}

the state, why then are they not subject to the same safety requirements? Indeed, the potential harms and dangers that can arise when an unregulated/unlicensed driver is authorized to provide for-hire vehicle services, without oversight or enforcement, is more than just conjecture -- criminal incidents have occurred. We cannot stand-by and allow unlicensed transportation operating companies to continue to circumvent existing regulations which are intended to protect the riding public.

It is evident that there is a dearth of information necessary to evaluate these companies, their business model(s) and their services. The Commission should consider adopting newly available technological solutions for automated collection of fleet data that can offer regulators a secure, inexpensive cloud-based web interface upon which they can view a custom-designed variety of enforcement events and data, in real-time. This type of system is being considered by regulators around the country. We believe that the implementation of such a data collection system would allow regulators to leverage existing enforcement and investigative personnel to further oversee and regulate new and traditional transportation service providers within the Commission's jurisdiction.

3.3. RIDESHARING

While the Public Utilities Code exempts from regulation passenger vehicles that carry passengers on a "noncommercial enterprise basis,"⁹ this term is not defined. Nevertheless, many of these new "ridesharing" companies (i) fail to meet the definition for ridesharing (as they operate outside of strictly work and home locations, and transport passengers on trips that are NOT incidental to the driver) and (ii) fail to qualify for the Commission exemption because they are operating for profit/compensation. Although the companies say they enable ridesharing and that donations are voluntary, the rating system between passengers and drivers gives rise to potential trip refusals based on a passenger's option to not provide the "suggested donation", which also indicates a profit motive.¹⁰ Moreover, these companies receive a share of "suggested donations", which also demonstrates a "primary purpose" to make a profit. Again, the *modus operandi* of these companies is to simply announce that they fall within a regulatory exemption and that they are entitled to operate without oversight. We urge the Commission to put a stop to

⁹ Public Utilities Code § 5353(f).

¹⁰ <http://allthingsd.com/20120626/sunil-pauls-sidecar-app-will-flag-a-strangers-car-for-you/>
{10809371:9}

these avoidance tactics by making a clear statement that these companies are subject to Commission regulation.

The Commission should act to clarify the regulatory exemption and to make clear that to qualify for the exemption, a driver is prohibited from making any profit and/or accepting compensation. We propose that the Commission's definition for ridesharing be narrowed. In order to capture the true meaning of ridesharing, the IATR suggests the following language as a definition for "ridesharing":

Rideshare: The travelling of two or more persons by any mode of private passenger vehicle, including, but not limited to, carpooling, vanpooling, buspooling, to any location incidental to another purpose of the driver, without charge, fee, or payment, for which a gratuity is neither accepted, collected, encouraged, promoted and/or requested, and for which the primary purpose of the driver cannot be profit or revenue based. Gratuity herein shall not include reimbursement for gasoline usage or tolls. Currency or any other form of electronic payment or other consideration collected in excess of reimbursement for gasoline usage shall be considered for-hire transportation, and such applicable licenses are required. Rideshare transportation is exempt from [regulatory body] licensure. Rideshare services exclude any and all for-hire transportation as defined within this Code.¹¹

In addition to the foregoing, we also suggest language which explicitly prohibits any payment processing or the charging of fees by third-parties for ridesharing services. This would allow all current, legitimate ridesharing communication platforms to continue to match riders and drivers with common destinations while preventing a proliferation of unregulated, untrained and unscreened vehicles and their owners from taking to the streets to supplement their incomes to the detriment of the public interest.

3.4. TRANSPORTATION ACCESS

The enforcement of safety regulations on all transportation operating companies can only promote public safety and will ensure that the public enjoys convenient and secure transportation along the state's roadways. There is no rational basis to insulate an entire sector of transportation

¹¹ This definition was developed as part of the IATR's model regulations available at www.windelsmarx.com. {10809371:9}

providers from responsibility. Further, the rating system that is typically part of these apps may impede access to roadways. For example, a passenger with a low rating may never be picked up because drivers decline the request based on the rating. Upon information and belief, a passenger who does not maintain a fairly high rating will be removed from the system entirely. These are clearly examples of trip refusal which may be based on any number of inappropriate and/or illegal reasons, and which we all can agree is not in the best interest of the riding public.

Another example of disparate access to roadways is that vehicles affiliated with these app companies are not wheelchair-accessible and are not currently considered for-hire vehicle companies that should provide accessible service. California residents and visitors with disabilities will be excluded from this new avenue of for-hire transportation services. We simply cannot allow for this to happen.

3.5 INSURANCE

Under the California State Insurance Code¹², vehicles engaged in “personal vehicle sharing programs”, (defined as a business of facilitating the *sharing* of private passenger vehicles for noncommercial use by individuals within the state), are not considered commercial vehicles, for-hire vehicles, or liveries for purposes of for-hire vehicle insurance requirements, and drivers may collect revenue so long as such annual revenue does not exceed the annual expenses of owning and operating the vehicle. However, even vehicle owners of vehicles engaged in personal vehicle sharing programs must maintain, among other requirements, liability coverage no less than three (3) times the minimum insurance requirements for private passenger vehicles.¹³ They are also required to provide detailed trip sheets to regulatory agencies and insurance companies; they are required to take responsibility for all installation of equipment and any resulting damage to the vehicle or theft; and they are required to assume the defense of the vehicle owner when an incident occurs while someone was driving pursuant to the personal vehicle program, even if there is a dispute about who was driving at the time. Accordingly, it is not adequate to lift one element of the personal vehicle sharing statute, the definition of “profit”, and apply it to ridesharing without considering the larger context of that definition.

¹² Cal. Ins. Code § 11580.24.

¹³ *Id.*

{10809371:9}


Indeed, the operations of many of the purported “ridesharing” companies do not meet the requirements of a personal vehicle sharing program for several reasons: (1) the drivers are the vehicle owners and are not loaning-out/sharing their car with other persons, but rather providing transportation services themselves to other persons; (2) the drivers are not maintaining the necessary insurance requirements; (3) while the third-party “ridesharing” companies may be maintaining trip sheet data through their apps, the vehicle owners/drivers are not, as required under the statute; and (4) the argument can be made that these vehicles are being used for a commercial purpose.


Further, the standard used by the Insurance Code would allow all annual vehicle costs to be counted against the measure of “profit”. The American Automobile Association (“AAA”) has adopted an annual index of vehicle ownership costs, but that index is based upon an assumption of 15,000 personal miles driven. If the vehicle is driven additional miles while providing transportation services, the measure of profit should be the cost of those additional miles. Remuneration for peer-to-peer transportation services should not also subsidize the 15,000 personal miles that are assumed by AAA to calculate vehicle expenses. If the same mileage assumption is used, these “ridesharing” vehicles—that is to say, anyone with a car and a drivers’ license—would be given license to drive about 300 miles per week, hardly the incidental “community” activity that it is characterized to be by those who hope to profit from it.

We agree with the Commission that further information must be gathered from the relevant insurance stakeholders, as well as police enforcement, to continue to analyze how and to what extent these vehicles are covered by insurance when providing transportation services, whether there have been any accidents involving drivers from such companies, and what has been the final disposition of any insurance claims filed. The Commission should be aware that some of these companies currently have broad indemnification clauses in their terms and conditions that serve to waive all liability for any damages resulting from the transportation services provided (including personal injury, death, property damage, lost time or wages) and places liability with the passenger—including an obligation for the passenger to indemnify the company. Further, the terms and conditions state that the use of such services is at the passenger’s sole risk.

It is the position of the IATR that the responsibility of public safety and liability belongs to the company profiting from providing transportation services, and it is offensive for such for-

profit companies to attempt to assign that responsibility to the passenger through language hidden in a click-through agreement. Indeed, we urge the Commission to fully vet these new app providers, to conduct an in-depth review and investigation of their business models and services, and to engage all parties to this OIR in conversation and analysis of the issues raised herein, in order to maintain the mission of the CPUC to protect the consumer, and to ensure access to safe and reliable transportation services.

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Dated: January , 2013

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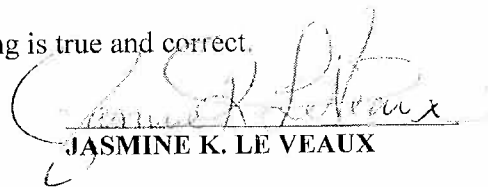
CERTIFICATE OF SERVICE

I, **JASMINE K. LE VEAUX**, am employed by the firm of Windels Marx Lane & Mittendorf, LLP, am not a party to this action, and am over 18 years of age. On January 29, 2013, I caused to be served the following:

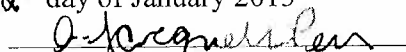
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on all known parties to the above-referenced Rulcmaking Proceeding, Docket No. 12-12-011, by transmitting an email message with the IATR Comments attached thereto, to each party named on the official service list to this proceeding, published on the website of the California Public Utilities Commission, www.cpuc.ca.gov/puc/, as of January 29, 2013, and by faxing or mailing by first-class mail, as designated by the party, a properly addressed copy of the IATR Comments to those whose email address was not available.

I hereby certify that the foregoing is true and correct.


JASMINE K. LE VEAUX

Sworn to before me this
29th day of January 2013


Notary Public

A JACQUELINE PEREZ
Notary Public, State of New York
No. 01PE5044052
Qualified in Bronx County
Commission Expires May 22, 2015

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