

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on)
Regulations Relating to Passenger Carriers,) Rulemaking 12-12-011
Ridesharing, and New Online-Enabled) (Filed December 20, 2012)
Transportation Services.)

**COMMENTS BY THE GREATER CALIFORNIA LIVERY ASSOCIATION ON
ASSIGNED COMMISSIONER'S RULING ON PROPOSED MODIFICATION TO
DECISION 13-09-045 ADOPTING RULES AND REGULATIONS TO PROTECT
PUBLIC SAFETY WHILE ALLOWING NEW ENTRANTS TO THE
TRANSPORTATION INDUSTRY**

The Greater California Livery Association
Attn: Rich Azzolino, President
8726 S Sepulveda Blvd #2317
Los Angeles, CA 90045-0082
T-866-392-4252
Email: razzolino@gatewaylimo.com

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On March 25, 2014, the assigned Commissioner in this Rulemaking proceeding invited comments on whether proposed additional insurance requirements were warranted and appropriate. The Greater California Livery Association (GCLA) welcomes this opportunity to comment on the additional coverage requirements set forth by the assigned Commissioner and to provide additional recommendations for consideration and adoption by the California Public Utilities Commission (CPUC).

On the issue of additional insurance coverage requirements, the GCLA believes the amount of the coverage specified in the assigned Commissioner's rules are fair and responsible because they are in line with insurance requirements for other types of operators regulated by the CPUC. However, GCLA emphatically states that to protect public safety, primary commercial coverage (not surplus or excess coverage) must be transparent (not sealed) and in full force and effect 24 hours per day, 7 days per week throughout the year, just as required for charter-party carriers and other companies engaged in transportation for hire.

Without this 24/7 requirement, in the event of a claim, an unacceptable delay would occur in paying the claim because of the time required to research the circumstances of an accident to determine if the TNC driver's mobile app was engaged and for the insurance companies to come to an agreement on which one will pay the claims. A commercial insurance card must be accessible within the vehicle providing the transportation service as required by the California Vehicle Code.

It is also essential that the TNCs register their Vehicle Identification Numbers (VIN) and California drivers' license numbers with the primary commercial insurance carrier as is required for all charter-party carriers. Additionally, all VIN numbers must be registered with the CPUC as is required for charter-party carriers.

Furthermore, to guarantee insurance carrier stability and payment of claims, the GCLA requests that only 'A' rated and admitted carriers be required. Most municipalities and airports in California currently require this. This is the only way to ensure any and all claims can and will be paid in the event of an insurance carrier's failure. Offshore captives and other aggressive insurance options need to be carefully reviewed by the CPUC before being considered.

Finally, the GCLA believes that safety training and vehicle maintenance records should be kept and reviewed annually. Again, this will align the TNCs with the requirements placed on charter-party carriers in the interest of public safety.

Dated April 7, 2014, at Los Angeles, California.

/s/ RICH AZZOLINO
Rich Azzolino
President
Great California Livery Association
8726 S. Sepulveda Blvd. #2317
Los Angeles, CA 90045-0082
razzolino@gatewaylimo.com