

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

Order Instituting Rulemaking to Implement
Senate Bill 1376 Requiring Transportation
Network Companies to Provide Access for
Persons with Disabilities, Including Wheelchair
Users who need a Wheelchair Accessible
Vehicle.

R.19-02-012
(Filed February 21, 2019)

**JOINT RESPONSE OF THE SAN FRANCISCO MUNICIPAL TRANSPORTATION
AGENCY, THE SAN FRANCISCO OFFICE ON DISABILITY AND ACCESSIBILITY, AND
THE SAN FRANCISCO COUNTY TRANSPORTATION AUTHORITY TO UBER
TECHNOLOGIES, INC.'S PETITION FOR MODIFICATION OF
DECISION 20-03-007**

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Dated: May 8, 2025

I. INTRODUCTION

Pursuant to California Public Utilities Commission (“Commission” or “CPUC”) Rule of Practice and Procedure 16.4(f), the San Francisco Municipal Transportation Agency (“SFMTA”), the San Francisco Office on Disability and Accessibility, and the San Francisco County Transportation Authority, (collectively “San Francisco” or “SF”) submit this joint response to Uber Technologies, Inc.’s (“Uber’s”) Petition for Modification of Decision (“D.”) 20-03-007, filed on April 8, 2025.

San Francisco supports Uber’s Petition to modify D.20-03-007 to allow third-party transportation providers that are taxicab companies, in addition to charter party-carriers (“TCPs”), to provide wheelchair accessible vehicle (“WAV”) service in partnership with Transportation Network Companies (“TNCs”) as part of the Access for All Program (“AFA Program”)¹ Allowing taxis to provide WAV trips via TNC applications would lead to enhanced access to a larger fleet of on-demand WAVs for those requesting TNC WAV trips, while providing additional business and income for WAV taxi drivers.

II. DISCUSSION

- A. To increase the availability of on-demand WAV trips, the Commission should accept Uber’s proposed modification to D.20-03-007 to allow taxicabs to provide WAV trips via a TNC’s app as part of the AFA Program, including allowing these trips to be counted toward a TNC’s offset requests.**

As Uber notes, “[c]urrently, the WAV supply does not meet all rider demand on Uber’s platform throughout California. In addition, many taxicab companies have available resources to meet this demand: wheelchair ramp taxis.”² These resources are certainly available in San Francisco, where there are approximately 50 ramp taxi medallions in service. Moreover, it is within the SFMTA’s regulatory authority to permit additional ramp taxis if needed to meet increased demand.³

Uber continues, “[f]urthermore, the existing partnerships between Uber and the taxi industry have been successful, showing increased earning for drivers and more utilization of taxis by riders.”⁴

¹ Uber Petition for Modification of D.20-03-007, at 4.

² *Id.*, at 3.

³ San Francisco Transportation Code § 1115.

⁴ Uber Petition for Modification of D.20-03-007, at 3.

In San Francisco, the Taxi Upfront Fare Pilot Program allows third-party providers, such as Uber, to send trip requests to taxi E-Hail applications, which are then serviced by participating taxi drivers. This arrangement has resulted in more taxi trips, increased earnings for drivers, and no negative effects on overall taxi service, including paratransit service provided by taxicabs.⁵ Currently, WAV trips are not serviced through the Taxi Upfront Fare Pilot. But if D.20-03-007 were modified, ramp taxi WAV service could be incorporated into the Pilot or another program, adding to the above stated benefits while also increasing the availability of on-demand WAV rides.

Uber states that “this proposal is only feasible if WAV rides referred through the Uber App and fulfilled by ramp taxis will qualify for inclusion in the AFA Program and Uber’s requests for offsets pursuant to that Program.”⁶ San Francisco supports this inclusion because TNCs who choose to partner with taxi providers will pay for costs incurred for these trips, including incentives or bonuses, just like it pays for other subcontractors providing on-demand WAV trips under the AFA Program. Because driving a ramp taxi requires additional training, a more expensive vehicle, and often more expensive maintenance costs, the SFMTA pays ramp taxi drivers incentives to support service availability.⁷ In San Francisco, the SFMTA would collaborate with stakeholders to ensure similar incentives are available to ramp taxis providing WAV trips in partnership with a TNC.

B. Taxicabs are subject to strict safety requirements that strongly align with the AFA Program standards established by the Commission.

As the regulator of taxicabs in San Francisco, the SFMTA affirms that San Francisco taxis must adhere to rigorous safety standards, which include criminal background checks, liability insurance, and drug and alcohol testing.⁸ As Uber notes, “[t]he standards established for non-permitted transportation carriers who can be eligible Access Providers in the AFA Program are effectively the

⁵ Kate Toran, *Memorandum to the SFMTA Board of Directors, Taxi Upfront Fare Pilot – Year 2, Second Quarter Report*, SFMTA.com, Nov. 14, 2024, at 3, <https://www.sfmta.com/media/41144/download?inline>.

⁶ Uber Petition for Modification of D.20-03-007, at 3.

⁷ *SFMTA Ramp Taxi Incentive Program*, SFMTA.com, last update May 26, 2023, <https://www.sfmta.com/ramp-taxi-incentive-program>.

⁸ Kate Toran, *SFMTA Ramp Taxi Requirements*, SFMTA.com, May 20, 2022, <https://www.sfmta.com/media/31777/download?inline>; San Francisco Transportation Code § 1103.

same standards established for taxicab companies.”⁹ Additionally, all San Francisco ramp taxi drivers undergo additional training to learn how to properly secure wheelchair users, as well as disability sensitivity training. Ramp taxi drivers in San Francisco are well-equipped to provide safe, accessible WAV service.

C. If Uber’s Petition were granted, San Francisco would explore permitting a partnership between TNCs such as Uber and taxi companies to provide WAV service on ramp taxis and would monitor such a program to ensure ramp taxi riders, including paratransit riders, do not experience degraded service.

San Francisco has had ramp taxi service since the early 1990s. In San Francisco, taxis (including ramp taxis) are all required to provide paratransit trips, and taxis have long been an essential partner in providing accessible transportation to people with disabilities and older adults. If the Commission allows taxis to provide WAV service as part of the AFA Program and if, as mentioned above, the SFMTA permits a partnership between ramp taxis and TNCs, such as Uber, the SFMTA would closely monitor the program to ensure it does not negatively affect ramp taxi service, including paratransit ramp taxi service. As the taxi industry regulator, the SFMTA has policy and enforcement levers that can be deployed if adjustments are necessary to ensure the ongoing provision of high-quality ramp taxi service.

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⁹ Uber Petition for Modification of D.20-03-007, at 6.

III. CONCLUSION

Given the opportunity to increase access to on-demand WAV service, and for the reasons stated above, San Francisco supports Uber's Petition and requests that the Commission revise Ordering Paragraph 28 of D.20-03-007 to allow taxicab companies, in addition to TCPs, to provide WAV services in partnership with TNCs as part of the AFA Program and allow trips provided by ramp taxis (and expenses associated with those trips) to be included within a TNC's requests to qualify for offsets as part of the AFA Program. Finally, San Francisco notes that the alignment between Uber and San Francisco on this issue is a positive development resulting from the collaboration and lessons learned on this now long-standing rulemaking.

Dated: May 8, 2025

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