

**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 COMMENTS OF THE SAN FRANCISCO MUNICIPAL TRANSPORTATION  
AGENCY, THE SAN FRANCISCO OFFICE ON DISABILITY AND ACCESSIBILITY, AND  
THE SAN FRANCISCO COUNTY TRANSPORTATION AUTHORITY TO PROPOSED  
DECISION GRANTING PETITION FOR MODIFICATION OF DECISION 20-03-007 BY  
UBER TECHNOLOGIES, INC.**

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Dated: August 11, 2025

## I. INTRODUCTION

Pursuant to California Public Utilities Commission (“Commission” or “CPUC”) Rule of Practice and Procedure 14.3, the San Francisco Municipal Transportation Agency, the San Francisco Office on Disability and Accessibility, and the San Francisco County Transportation Authority (collectively “San Francisco” or “SF”) submits these Joint Comments (“Comments”) to the Proposed Decision Granting Petition for Modification for Decision 20-03-007 by Uber Technologies, Inc. (“Uber”), filed on July 22, 2025 (“Proposed Decision”).

San Francisco supports the Proposed Decision and its additional qualification applying requirements (1)-(3) of Ordering Paragraph 12 of Decision 21-11-004.<sup>1</sup> San Francisco submitted a response in support of Uber’s Petition for Modification of Decision 20-02-007 (“Uber’s Petition for Modification”) and agrees with the Proposed Decision that “a modification to OP 28 would expand the number of WAV [Wheelchair Accessible Vehicle] options for customers and enhance the AFA Program’s [Access for All Program’s] ability to ensure the widest access to WAV services.”<sup>2</sup>

## II. DISCUSSION

As stated in San Francisco’s response to Uber’s Petition for Modification, allowing taxicabs and charter-party carriers (“TCPs”) to provide WAV trips via the Uber App as part of the AFA Program will increase the on-demand availability of such trips.<sup>3</sup> Further, as San Francisco noted in our response, “[t]axicabs are subject to strict safety requirements that strongly align with the Access for All Program standards established by the Commission.”<sup>4</sup> Therefore, San Francisco appreciates the Commission’s support for Uber’s Petition for Modification and reiterates its desire to “explore permitting a partnership between TNCs [Transportation Network Companies] such as Uber and taxi

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<sup>1</sup> Proposed Decision at 1, 9.

<sup>2</sup> *Id.*, at 7.

<sup>3</sup> Joint Response of SF to Uber’s Petition for Modification at 1.

<sup>4</sup> *Id.*, at 2.

companies to provide WAV service on ramp taxis.”<sup>5</sup> San Francisco “would monitor such a program to ensure ramp taxi riders, including paratransit riders, do not experience degraded service.”<sup>6</sup>

The Proposed Decision’s additional qualification would require WAV providers without TCP permits to demonstrate they meet standards (1)-(3) of Ordering Paragraph 12 of Decision 21-11-004, which cover background checks, insurance requirements, and controlled substance and alcohol testing.<sup>7</sup> San Francisco supports this addition to Uber’s proposed modification.

### III. CONCLUSION

For the reasons stated above, San Francisco supports the Commission’s Proposed Decision granting Uber’s Petition for Modification. Allowing taxis to provide WAV trips via TNCs will enhance access to on-demand service for those requesting a wheelchair accessible trip while providing additional business and income for WAV taxi drivers.

Dated: August 11, 2025

Respectfully submitted,

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On behalf of: THE SAN FRANCISCO MUNICIPAL  
TRANSPORTATION AGENCY, THE SAN  
FRANCISCO OFFICE ON DISABILITY AND  
ACCESSIBILITY, AND THE SAN FRANCISCO  
COUNTY TRANSPORTATION AUTHORITY

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<sup>5</sup> *Id.*, at 3.

<sup>6</sup> *Id.*

<sup>7</sup> Proposed at 6-8.