

2024 Annual Benchmark Report

R.19-02-012 TRANSPORTATION NETWORK
COMPANY ACCESS FOR ALL PROGRAM

February 2025

This report presents analysis of the WAV performance data submitted by participating Transportation Network Companies for the 20-quarter period from program launch in the 3rd quarter of 2019 (Q3 2019) through the 2nd quarter of 2024 (Q2 2024), focusing on service provided from the 3rd quarter of 2023 (Q3 2023) through the 2nd quarter of 2024.



**California Public
Utilities Commission**

2024 Annual Benchmark Report
on the Transportation Network Company
Access for All Program

Contributors:

Anna Jew, Senior Analyst

Noah Thoron, Analyst

Joshua Huneycutt, Program Manager, Transportation Licensing and Analysis Branch

Contents

EXECUTIVE SUMMARY	1
INTRODUCTION.....	5
ACCESS FEE REMITTANCE OFFSET STANDARDS: REVIEW OF PERFORMANCE.....	8
Offset Requirements	8
Presence and Availability of Wheelchair Accessible Vehicles	10
Wheelchair Accessible Vehicles in Operation	11
Wheelchair Accessible Vehicles Trip Requests.....	11
Trip Outcomes	13
Trips Completed and Not-Accepted.....	14
Trips Cancelled by Passengers and Drivers	14
Improved Level of Service.....	16
Response Time Standard.....	16
Response Times.....	19
Wheelchair Accessible Vehicle vs Non-Wheelchair Accessible Vehicle Response Times	22
Response Time Standard Performance	23
Trip Completion Standard.....	24
Funds Expended	26
Outreach	32
Complaints and Comments	33
ACCESS FEE REMITTANCE EXEMPTION STANDARDS: REVIEW OF PERFORMANCE.....	35
Fee Remittance Exemption Requirements.....	35
Fee Remittance Exemption Standards Analysis.....	36
ACCESS FUND ADMINISTRATORS	38
Access Fund Administrators	38
Roles and responsibilities of an Access Fund Administrator.....	38
Local Access Fund Administrators	39
Local Access Fund Administrator Funding.....	39
Local Access Fund Administrator: Access Provider Solicitation.....	40
Local Access Fund Administrator Performance.....	41
Statewide Access Fund Administrators	45
Statewide Access Fund Administrator Funding	45
COMMUNITY WHEELCHAIR ACCESSIBLE VEHICLE DEMAND.....	47

APPENDICES	51
Appendix A – Offset Requirements	51
Appendix B – Eligible Wheelchair Accessible Vehicle Expenses.....	53
Appendix C – Quarterly Exemption Response Times by TNC and County	54
Appendix D – Entities Conditionally Selected as Local Access Fund Administrators	55
Appendix E – California's Population with Ambulatory Difficulties by County ...	57

Tables & Figures

Table 1: Adopted Offsets Requirements	9
Table 2: Breakdown of WAV Trip Outcomes by TNC (Q3 2023 - Q2 2024).....	13
Table 3: Offset Response Time Benchmarks: Response Time (minutes).....	17
Table 4: Offset Time Standard (percentage) Effective Q2 2020 – Q1 2022	17
Table 5: Offset Time Standard (percentage) Effective Q2 2022 - Present	17
Table 6: Trip Completion Standard (effective Q2 2021-Q2 2022).....	18
Table 7: Trip Completion Standard (effective Q2 2022 - Present).....	18
Table 8: Trip Completion Schedule by county group (effective Q2 2022 - Present)	18
Table 9: Quarterly Level 1 Response Times by TNC and County compared to Level 1 Response Time Benchmarks.....	19
Table 10: Q1 2022 WAV and Q3 2021 – Q3 2022 Non-WAV Response Time Comparison (in minutes)	23
Table 11: Total WAV Expenditures by Category and TNC	29
Table 12: Unique Methods of Outreach (Q3 2019 – Q2 2024)	33
Table 13: Customer Complaints (Q3 2019 – Q2 2024).....	34
Table 14: Offset Response Time Benchmark (ORTB) For Exemptions	36
Table 15: Access Fund Amounts Awarded Per LAFA	40
Table 16: Access Provider Selection Utilizing Cycle 3 Funds as of July 1, 2024	41
Table 17: Remaining Access Funding Balance Through June 2023.....	45
Table 18: 2024-2025 Projected Access For All Funding Availability	46
Table 19: California's Population with Disability by Type	48
Table 20: Breakdown of Population with Ambulatory Difficulty by Age Group	48
Table 21: Quarterly Exemption Response Times by TNC and County (Level 2 Benchmark Standard: Q2 2022 - Present).....	54
Figure 1: Access for All Program Overview Diagram	7
Figure 2: Average WAV driving hours across times of day since Q3 2019	11
Figure 3: Breakdown of WAV Trips Requested by TNC (Q3 2019 - Q2 2024).....	12
Figure 4: Total WAV Trips Requested by Quarter	12
Figure 5: WAV Supply and Demand Across Time of Day	13
Figure 6: Completed trips compared to not accepted trips.....	14

Figure 7: Cancelled WAV Trips as a Percentage of All Requested Trips	15
Figure 8: Overview of Trip Outcomes by TNC (Q3 2019 - Q2 2024)	16
Figure 9: Distribution of Level 1 Response Times in County Group A and C (Q3 2019 - Q2 2024)	20
Figure 10: Distribution of Quarterly Level 1 Response Times in Group B Counties (Q3 2019- Q2 2024)	22
Figure 11: Level 1 (50%) Offset Time Standards by TNC from Q2 2020 to Q2 2024	24
Figure 12: Quarterly Total Completed Trips and Trip Completion Rate	25
Figure 13: Quarterly Total Completed Trips by TNC	25
Figure 14: Trip Completion Rate by TNC	26
Figure 15: Fees Collected and Dispered to TNCs and LAFAs (Q3 2019 to Q2 2024)	27
Figure 16: WAV Expenditure to Date (Q3 2019 – Q2 2024)	27
Figure 17: Percent of WAV Expenditures by Category and TNC (Q3 2019 – Q2 2024)	28
Figure 18: Quarterly WAV Expenditures: Requested vs. Approved	30
Figure 19: Quarterly Cost Per WAV Trip by TNC.....	31
Figure 20: Quarterly Total WAV Offsets and Completed Trips	32
Figure 21: Quarterly Trend in Customer Complaints Weighted by TNC Total WAV Trips (Q3 2019 – Q2 2024)	34
Figure 22: Trips Requested and Completed by Access Providers	42
Figure 23: WAV Hours provided by LAFAs by Quarter.....	43
Figure 24: WAV Hours provided by LAFAs by Hour of Day	43
Figure 25: WAV Hours Provided by LAFAs by County.....	44
Figure 26: Percentage of California Population with Ambulatory Difficulty, by County .	49
Figure 27: Number of People with Ambulatory Difficulty in County per Average Quarterly WAV Hours.....	50

Executive Summary

The Access for All Program (“AFA” or “Program”) was developed to implement Senate Bill (SB) 1376 (Hill, 2018), which directed the California Public Utilities Commission (CPUC) to establish a Program to increase the availability of on-demand transportation for persons with disabilities, including wheelchair users who need a wheelchair-accessible vehicle (WAV). The Program began implementation in the third quarter of 2019 and is designed to encourage growth in the availability of on-demand transportation that meets the mobility needs of persons with disabilities, including wheelchair users who need a WAV. This is achieved by collecting a per-trip fee on all transportation network company (TNC) trips that originate in California, which is then re-invested in WAV service.

This report provides a review of the Program and provides the following in accordance with Decision 21-03-005, which directed the CPUC to submit a report to include:

- (i) A study on the demand for WAVs, including demand according to time of day and geographic area.
- (ii) An analysis of the report required to be submitted by access providers receiving funding.
- (iii) The availability of unallocated funds in the Access Fund, including the need to reassess Access Fund allocations.
- (iv) An analysis of current Program capabilities and deficiencies, and recommendations to overcome any identified deficiencies.

The report presents analysis of data provided on a quarterly basis by TNCs participating in the Program¹ from the third quarter of 2019 (Q3 2019) through the second quarter of 2024 (Q2 2024).

CPUC’s Consumer Protection and Enforcement Division (CPED) staff assessed Program-funded TNC WAV service performance relative to benchmarks established by the CPUC. Service performance benchmarks include WAV trip completion rates, WAV response times, the presence of WAVs across hours of the day, WAV-related expenditures, promotion of WAV service through outreach and engagement, and occurrence of complaints from WAV customers. The findings show that, in Los Angeles, San Francisco, and San Mateo, WAV service funded by the Program and provided by TNCs often meets and exceeds Program goals in most key performance areas including meeting response times, increasing outreach and engagement efforts, and increasing presence and availability of WAVs. Still, there is room for improvement, especially in the areas of trip cost and trip completion rate, and more to be learned about statewide feasibility and appropriate performance expectations of on-demand WAV service.

¹ Note that this report reflects only the data provided by the TNCs from areas where they participated in the Program. In other words, TNCs may have provided WAV service, but may have not sought reimbursement as part of the Program. Effective Q3 2023, to address gaps in data reporting, the CPUC now requires TNCs to report data on their WAV operations in all California counties, regardless of whether they participated in the Program.

The following is a summary of performance for the last year in the context of the life of the program.

Response Times and Trip Completion Rates

- **TNC WAV service meets the required response times in several counties.** While TNCs are successfully providing WAV service in population centers across the state, reported WAV response times vary significantly by county. TNCs do not report data on counties where standards were not met or where TNCs considered but did not offer WAV service due to the infeasibility of meeting the response times. Over the last year, median response times fluctuated slightly, with no discernible trend over the past year.
- **Completed WAV trip volume more than doubled year-over-year.** From Q3 2023 to Q2 2024, TNCs completed 91,056 WAV trips, a 240% increase from the 37,879 trips completed from Q3 2022 to Q2 2023. Much of this trip volume has been provided by Uber (68%).
- **Most WAV trip requests were completed this year, reflecting an overall trend of improved reliability over the course of the program.** From Q3 2023 to Q2 2024, overall trip completion rates averaged 60%.
- **TNC WAV service met response time benchmarks,** with some geographic variance. The percentage of trips that were completed within response time benchmarks have remained above 60% in most counties, while the percentages are higher in some counties, ranging between 80 and 100%.
- **Wait times for WAV passengers are often 10+ minutes longer than for non-WAV passengers.** For example, in Los Angeles County, the largest TNC market in California, average non-WAV response times were 12 minutes faster than average WAV response times in 2019, 8 minutes faster in 2021, and 15 minutes faster in 2022. In San Francisco, non-WAV response times were 11 minutes faster in 2019, 10 minutes faster in 2021, and 8 minutes faster in 2022 than WAV response times.

Presence and Availability of WAVs

- **There is WAV availability and demand across the Program 24 hours a day, but availability varies significantly at the local level.** WAV availability is highest between the hours of 8 AM to 5 PM and lowest between 12 AM to 3 AM, matching demand. Though the hourly distribution of trips requested matches that of WAV availability, both supply and demand vary significantly by county.
- **TNCs' WAV supply appears to better match demand than in the early years of the program.** The percentage of trips completed increased while the percentage of trip requests not accepted decreased. The percentage of completed trips was 19% at the beginning of the Program in Q3 2019. However, it has increased and remained above 40% since Q2 2020 and reached an overall high of 76% in 2022. Concurrently, the share of unaccepted trips declined significantly from a high of 63% in Q3 2019 to 5% in Q3 2022, suggesting the supply of WAVs now better matches demand. From Q3 2023 to Q2 2024, overall trip completion rates averaged 60% and not accepted trip rates averaged 14%.

Funds Expended Relative to WAV Service Provided

- **Reimbursable WAV-related expenditures decreased while service expanded this year, suggesting continued cost efficiency improvements.** TNCs' reimbursable WAV-related expenditures have decreased over the Program's lifespan. To date, TNCs invested about \$73 million in WAV services, \$43 million of which was awarded through the Program, including \$14.4 million in 2024.
- **Costs to TNCs to provide WAV trips remains high, but the decreasing overall expenditures and increasing ridership could lead to further efficiencies.** Per-trip costs from Q3 2023 to Q2 2024 averaged \$158.49 overall, representing a 4% decrease from the prior year. In this analysis period, trip costs were \$145 for Lyft (a 64% decrease from the start of the program) and \$218 for Uber (a 20% decrease from the start of the program). This significant gap could be related to the variation in WAV service coverage areas across TNCs and fundamental differences in how each TNC provides WAV service, but recent performance has shown significant progress in lowering the cost per trip.

Outreach and Engagement with the Disability Community

- **TNCs have been promoting their WAV services to community groups but more robust data are needed to assess the impact of outreach efforts.** Most outreach from the TNCs involved direct marketing in the form of emails and phone calls. Other types of outreach included in-person engagement at events, in-app notifications, interviews, presentations, speaking engagements and sponsorships. Over the last year, Lyft has reported an additional 104 outreach efforts and Uber has reported an additional 40 outreach efforts. Additional outreach standards were set effective Q3 2023 including submitting an annual outreach plan, and submitting quarterly reports of progress made towards implementing the outreach plan. Uber and Lyft complied with their submitted plans thus far. In addition, to increased programmatic focus on these efforts, CPUC staff facilitates a quarterly Working Group to engage stakeholders and solicit feedback on TNCs' outreach efforts.

Complaints Logged by WAV Customers

- **Overall WAV customer complaints remained low relative to total volumes of trips requested and completed.** A total of 1,461 complaints (representing about 1% of trips) were received by the TNCs from their WAV customers between Q3 2019 to Q2 2024. The primary categories of complaints observed include driver training, vehicle safety and comfort, treatment of service animals, and stranding passengers. All three TNCs participating in the Program have low total complaints to total completed trip volume ratios. Over the last year, Uber and Lyft averaged 4.6 complaints per 1,000 trips (<1%).

Additional On-Demand WAV Service Provided by Local Access Fund Administrators (LAFAs)

- **Local Access Fund Administrators (LAFAs) administered Access for All funding in 10 counties in 2024.** Previous reports have not included data on the WAV programs provided by LAFAs. These data became available in the last year.
- **Newly available data shows LAFAs providing thousands of pre-scheduled and on-demand WAV rides each quarter.** LAFAs received an average of 9,097 ride requests (across 6 counties) per quarter from Q3 2023 to Q2 2024. Most (62%) on-demand WAV trip requests through LAFAs' programs were completed, but trip completion rates for pre-scheduled trips were much higher at 88%, resulting in an overall trip completion rate of 73% for LAFAs.
- **LAFAs received \$7,070,978 last year,** including 57% dispersed to SFMTA, 26% to LA Metro, and 13% to SANDAG. LAFAs dispersed funding primarily to cover the operating costs of their Access Providers (as opposed to capital costs associated with vehicle or equipment purchase).
- **Through LAFAs, the program expanded into new areas underserved by TNC WAV services,** including Redding Bus Authority, which will administer WAV services in Shasta County.

Introduction

BACKGROUND OF TNC ACCESS FOR ALL PROGRAM

The CPUC created the TNC Access for All Program in response to [Senate Bill \(SB\) 1376](#) (Hill: 2018), which directed the CPUC to establish a program to increase the availability of on-demand transportation for persons with disabilities, including wheelchair users who need a wheelchair-accessible vehicle.² In February 2019, the CPUC opened Rulemaking (R).19-02-012 to address implementation of SB 1376. The rulemaking has progressed along five tracks and issued corresponding decisions that address key policy and program issues for each track:

- Track 1 ([D.19-06-033](#)) – set the Access Fee amount of \$0.10 to be collected from each completed TNC trip and defined geographic areas as individual counties for the purpose of fee collection and redistribution.
- Track 2 ([D.20-03-007](#)) – established the offset and exemption requirements and process; response time standards and other criteria for TNCs; defined and identified eligible entities to serve as Local Access Fund Administrators (LAFAs); and defined the concept of a Statewide Access Fund Administrator (SAFA).
- Track 3 ([D.21-03-005](#)) – defined “on-demand” as it relates to WAVs; adjusted metrics for TNCs’ offset eligibility; set requirements for Access Providers and Local and Statewide Access Fund Administrators; and addressed other accessibility issues.
- Track 4 ([D.21-11-004](#)) – refined requirements for TNCs to be eligible for Offsets and Exemptions; modified eligibility requirements for Access Providers; clarified eligible WAV expenses must exclude WAV fare revenues received by TNCs; identified additional accessibility issues to be addressed in this proceeding; defined “Community WAV demand” for Annual Benchmarks Report; and modified CPED’s reporting schedule.
- Track 5 ([D.23-02-024](#)) – established performance framework for pre-scheduled WAV trips; modified data reporting for TNCs; and modified Community Outreach Requirements for TNCs.

To subsidize the costs of providing WAVs, [D.19-06-033](#) defined “geographic area” as counties, required TNCs to collect an “Access Fee” in the amount of \$0.10 for each TNC trip,³ and required TNCs to remit the total fees collected to the CPUC on a per county⁴ and quarterly basis beginning the third quarter of 2019. The fees collected from TNCs are

² See California Public Utilities Code [§5440.5\(a\)\(1\)](#).

³ See [D.19-06-033](#).

⁴ See [D.19-02-033](#) designated each county in California as a geographic area.

deposited into the CPUC’s TNC Access for All Fund (Access Fund) for distribution to “Access Providers”⁵ that establish on-demand transportation programs or partnerships to meet the mobility needs of persons with disabilities, including wheelchair users who need a WAV, in each county.

TNCs may “offset” the fees due to the CPUC by the amounts they spend quarterly to improve their own WAV service in each county.⁶ In [D.20-03-007](#), the CPUC established an Advice Letter process for the review and submission of offset requests.⁷ CPUC approval of offset requests allows the TNCs to keep some of the Access Fee revenue they collect, equal to the amount they invest in WAV service in a particular county in a particular quarter, so long as the WAV service meets performance requirements set by the CPUC.⁸ TNCs were allowed to retroactively seek offsets for quarters that preceded the issuance of [D.20-03-007](#), beginning with the quarter starting July 1, 2019⁹ through January 1, 2020.

If a TNC qualifies for offsets for four consecutive quarters in a geographic area and demonstrates that 80 percent of its completed WAV trips meet or exceed the Level 1 Offset Response Time Benchmarks for the same four consecutive quarters, then a TNC qualifies for an exemption from filing offset requests for the next four quarters. This allows the TNCs to keep the Access Fee revenue they collect for that county for the following four quarters. In [D.20-03-007](#), the CPUC established the Exemption process, which was refined in [D.21-11-004](#) and [D.23-02-024](#).

Any remaining monies (i.e., those not claimed by TNCs in the offset or exemption processes) are set aside in a fund called the Access Fund. These funds can then be distributed to local Access Providers through Access Fund Administrators. Access Providers are identified by Access Fund Administrators as providers that can provide WAV service similar to that of TNCs but require additional financial resources to do so.

In [D.23-02-024](#), the CPUC concluded that local transportation planning agencies (e.g., Metropolitan Planning Organizations, Regional Transportation Planning Agencies, County Transportation Commissions, and Public Transit Agencies) are best equipped and positioned to act as Local Access Fund Administrators (LAFA). The CPUC recognizes that these agencies may choose not to apply or may not qualify to be an Access Fund Administrator, or that selected agencies will not cover all geographic areas of the state. Therefore, the CPUC set forth a parallel process for CPUC staff to solicit and retain an independent entity to act as a Statewide Access Fund Administrator (SAFA), which may be a private or non-profit entity to serve as the Access Fund Administrator in geographic areas where there is no selected

⁵ SB1376 defines Access Provider as an organization or entity that directly provides, or contracts with a separate organization or entity to provide, on-demand transportation to meet the needs of person with disabilities.

⁶ See [D.20-03-007](#).

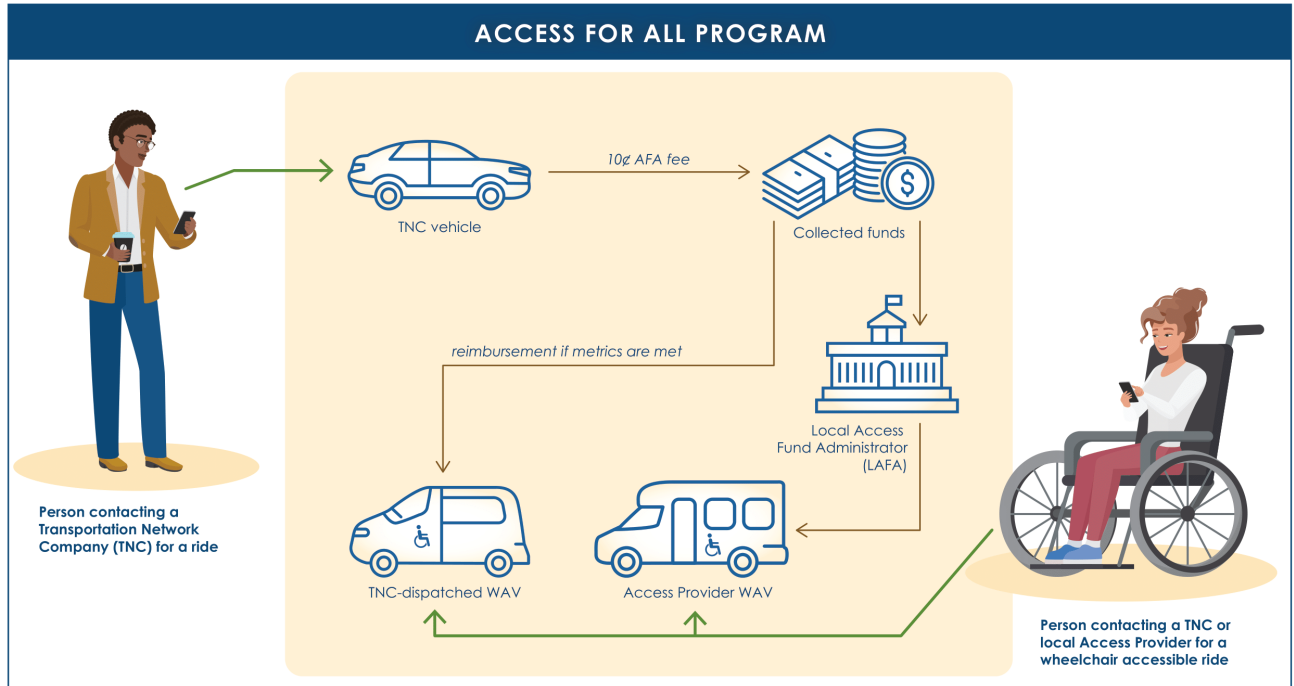
⁷ See [D.20-03-007](#) OP 19.

⁸ See Public Utilities Code [§5440.5\(a\)\(1\)\(B\)\(ii\)](#); Copies of the advice letters, including all supplements, dispositions, protests, replies and appeals, are available on the CPUC website [here](#).

⁹ See [D.20-03-007](#) at 40.

Lafa.¹⁰ Consequently, the CPUC delegated Access Fund Administrators the role of distributing funds to Access Providers in each county.

Figure 1: Access for All Program Overview Diagram



¹⁰ The Statewide Access Fund Administrator solicitation is currently in progress with an anticipation of selection in 2024.

Access Fee Remittance Offset Standards: Review of Performance

Offset Requirements

Pursuant to P.U. Code § 5440.5(a)(1)(B)(ii), CPUC authorized TNCs “to offset against the amounts due for a particular quarter the amount spent by the TNC during that quarter to improve WAV service on its online-enabled application or platform for each geographic area and thereby reduce the amount required to be remitted to the Commission.” Approval of offset requests allows the TNCs to keep some of the Access Fee revenue they collect, equal to the amount they invest in WAV service in a particular county in a particular quarter, so long as the WAV service meets performance requirements set by the CPUC.

To obtain an offset (i.e., reimbursement) for expenses accrued in the process of providing WAV service, a TNC must, at a minimum, demonstrate “in the geographic area, the presence and availability of drivers with WAVs on its online-enabled application or platform, improved level of service, including reasonable response times, due to those investments for WAV service compared to the previous quarter, efforts undertaken to publicize and promote available WAV service to disability communities, and a full accounting of funds expended.”¹¹ In addition, D.20-03-007 requires TNCs to comply with safety protocols (e.g., training and inspections).

Offset requirements have changed over the course of the program. Table 1 below illustrates the changes to the performance criteria. To satisfy the minimum performance requirements, the CPUC defined and established performance evaluation criteria. To satisfy presence and availability, data provides visibility into whether a TNC’s WAV service is improving during the quarter. The data on the number of operable WAVs and trips by hour of day provides insight into WAV supply and demand, as well as trip completion. To motivate improvements to TNC WAV service, the CPUC established response time and trip completion standards where the percentage of trips completed must improve quarter over quarter. To satisfy “efforts undertaken to publicize and promote available WAV service to disability communities,” a TNC must submit evidence of outreach efforts, which may include: a list of partners from disability communities, how the partnership promoted WAV services, and marketing or promotional materials of those activities. For “full accounting of funds expended,” the CPUC established qualifying expense categories which is defined as “a

¹¹ See Public Utilities Code [§5440.5\(a\)\(1\)\(ii\)](#).

reasonable, legitimate cost that improves a TNC’s WAV service and that is incurred in the quarter for which a TNC requests an offset.”

For a detailed description of each criterion, please see Appendix A – Offset Requirements (effective Q2 2023), which is a summary table each TNC must include upon submitting their advice letter.

Table 1: Adopted Offsets Requirements

Decision	Offset Requirements	Q3 2019 - Q1 2021	Q2 2021- Q1 2022	Q2 2022- Q1 2023	Q2 2023- onward
D.20-03-007	Presence and availability of WAVs Number of WAVs in operation; 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 for each geographic area.	✓	✓	✓	✓
D.23-02-024	Presence and availability of WAVs The unique number of WAVs in operation by quarter and by hour of the day and day of the week and total WAV trips requested and completed broken out by Census Tract.				✓
D.20-03-007	Improved Level of Service Interim Offset Response Time Benchmark (ORTB): Either Level 1 (50 th percentile) or Level 2 (75 th percentile) response times within the associated response time standard Offset Time Standard (OTS): Either Level 1 (50 th percentile) or Level 2 (75 th percentile) OTS for a quarter and demonstrated improvement over the prior quarter's performance	✓	✓		
D.21-11-004	Improved Level of Service Offset Response Time Benchmark (ORTB): Meet or exceed both the relevant Level 1 and Level 2 response time standard Offset Time Standard (OTS): Meet both the relevant Level 1 and Level 2 benchmarks (%) within the Offset response times (minutes).			✓	✓

Decision	Offset Requirements	Q3 2019 - Q1 2021	Q2 2021- Q1 2022	Q2 2022- Q1 2023	Q2 2023- onward
	The benchmarks shall advance each quarter, regardless of whether a TNC submits an Offset request in that quarter.				
D.21-03-005	Improved Level of Service Trip Completion Standard (TCS): Increase in the total number or % of completed WAV trips requested compared to previous quarter.		✓		
D.21-11-004	Improved Level of Service Trip Completion Standard (TCS): (a) Meet or exceed the applicable minimum percentage of trip requests completed, and (b) 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 benchmarks shall advance each quarter, regardless of whether a TNC submits an offset request.			✓	✓
D.20-03-007	Efforts to publicize and promote available WAV services	✓	✓	✓	✓
D.20-03-007	Full accounting of funds expended	✓	✓	✓	✓
D.20-03-007	Training and Inspections	✓	✓	✓	✓
D.20-03-007	Reporting Complaints	✓	✓	✓	✓

Presence and Availability of Wheelchair Accessible Vehicles

P.U. Code § 5440.5(a)(1)(B)(ii) requires that TNCs demonstrate “the presence and availability of drivers with WAVs on its online-enabled application or platform.” To demonstrate, D.20-03-007 requires TNCs to submit the following data:

- 1) The number of WAVs in operation - by quarter and aggregated by hour of the day and day of the week; and

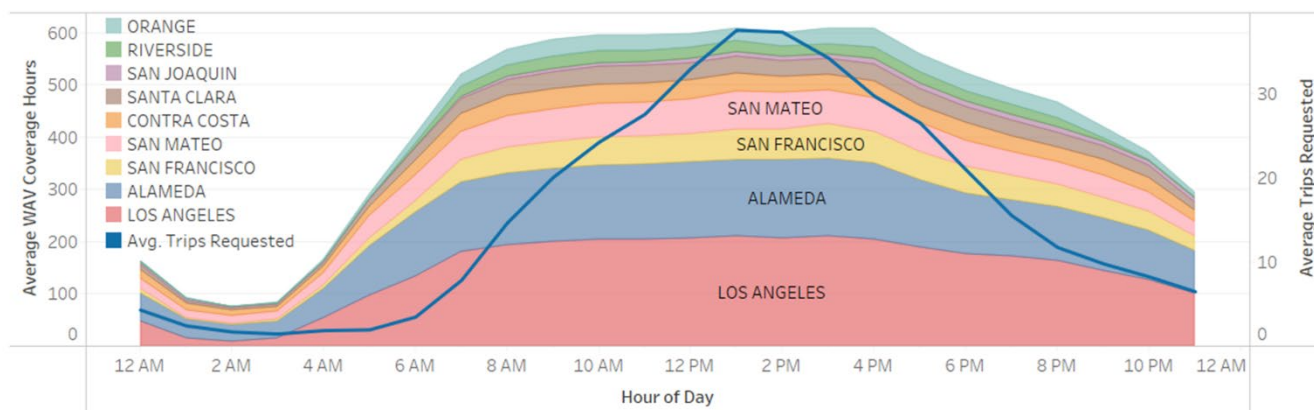
- 2) The number and percentage of WAV trips completed, not accepted, cancelled by passenger, cancelled due to passenger no-show, and cancelled by driver – by quarter and aggregated by hour of the day and day of the week.

Wheelchair Accessible Vehicles in Operation

WAV Operation Varies Based on Peak 24-Hour Demand

Figure 2 represents the average hours in a day by county, where WAVs were available to accept a trip request. As shown in Figure 2, the distribution of average hours of WAV availability varies across time of day, but it closely mirrors the average trips requested across all counties. Average WAV service across time follows a similar distribution for all counties with a peak in hours driven at approximately 7 AM. WAV availability is highest between regular business hours of 8 AM to 5 PM and lowest between 12 AM to 3 AM. TNCs are currently only required to report data for counties in which they request an offset, so the actual TNC-provided WAV service may vary (e.g., TNCs may provide WAV service in counties where they didn't request an offset, but since they are not required to report that WAV data, the number of WAV driving hours may appear lower than actual hours). Please see Appendix B for full distribution of WAV availability across times of the day by county.

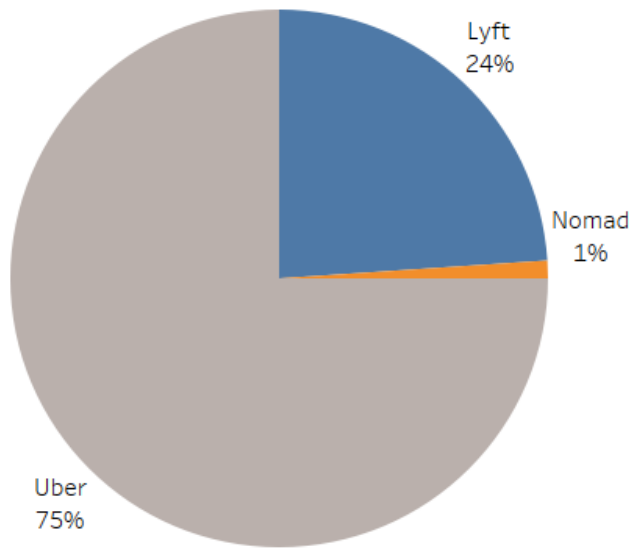
Figure 2: Average WAV driving hours across times of day since Q3 2019



Wheelchair Accessible Vehicles Trip Requests

There were 470,038 WAV trips requested from Q3 2019 to Q2 2024 and 152,159 WAV trips requested from Q3 2023 to Q2 2024, almost a third of the overall trip requests. As shown in Figure 3 below, 75% of those trips were requested through Uber, 24% through Lyft, and 1% through Nomad. Note, Nomad discontinued participation in the Program in Q1 2021.

Figure 3: Breakdown of WAV Trips Requested by TNC (Q3 2019 - Q2 2024)



Although WAV trips requested declined at the start of the COVID-19 pandemic, Q2 2023 data shows an increase in total WAV trips requested that mirror pre-pandemic numbers, which continues through the next four quarters, suggesting a return to pre-pandemic levels of demand.

Figure 4: Total WAV Trips Requested by Quarter

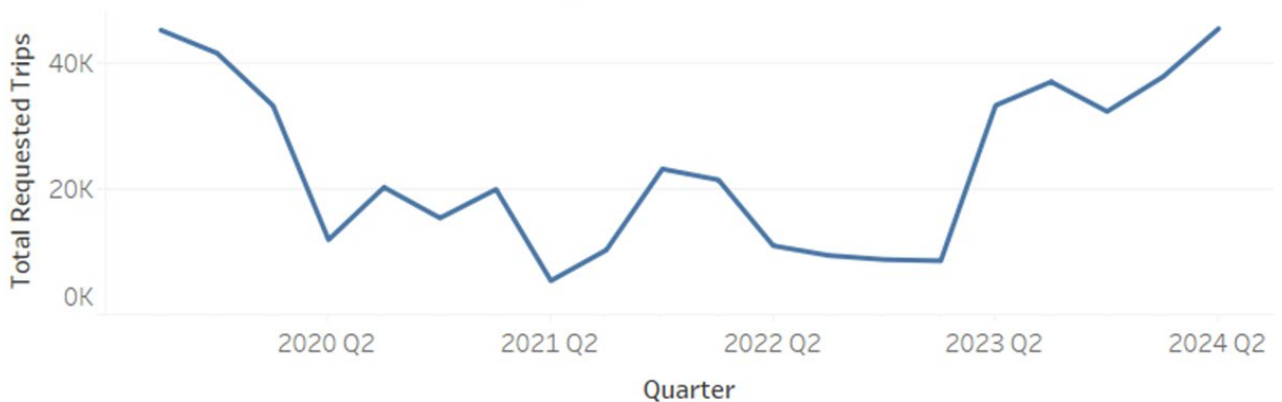
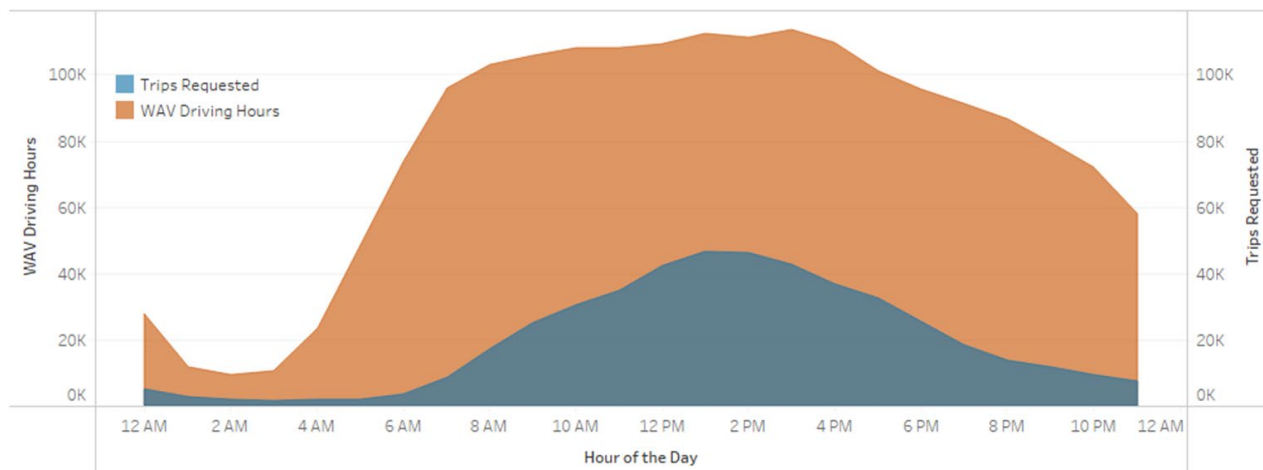


Figure 5 shows the hourly distribution of all WAV trips requested from Q3 2019 to Q2 2024, which peaks at similar hours as the WAV availability. WAV trip requests are concentrated between the hours of 8 AM to 5 PM and wane starting midnight to early morning.

Figure 5: WAV Supply and Demand Across Time of Day



Trip Outcomes

D.20-03-007 also requires the submission of the number and percentage of the following WAV trip outcomes:

- Completed – when a request is accepted and completed.
- Not accepted – when a request is not accepted because no drivers were available, or no driver accepted the request.
- Cancelled by passenger – when a passenger cancels the request before or after it was accepted by the driver.
- Cancelled by driver – when a driver accepts a request but then cancels the trip for any reason other than rider “no-show”.

These outcome types are aggregated by quarter, hour of day, and day of week. As shown in

Table 2, the breakdown by outcome type shows significant variations across outcome types by TNC. These variations may be attributed to the disparity in WAV service coverage across TNCs. Uber continues to provide WAV service in more counties than Lyft, and Nomad has not provided WAV service since Q1 2021.

Table 2: Breakdown of WAV Trip Outcomes by TNC (Q3 2023 - Q2 2024)

TNC	Total Trips Completed	Not Accepted	Canceled by Driver	Canceled by Passenger	Total Requested Trips
Lyft	28,709	2,674	709	7,008	38,079
Uber	62,347	19,173	1,766	30,831	114,117
Grand Total	91,056	21,847	2,475	37,839	152,196

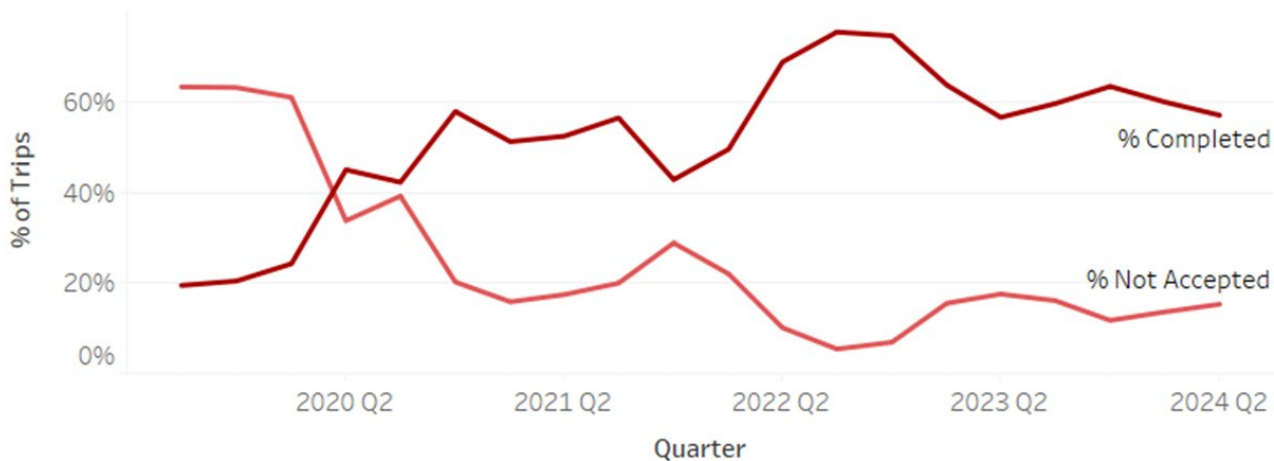
Trips Completed and Not-Accepted

Overall, the Percentage of Trips Completed Increased and Percentage of Trips Not Accepted Decreased

When comparing historical trip completion data, Q3 2022 shows the highest trip completion rate and lowest trips not accepted rate. The trend reverses in both completion and not accepted rates after late 2022. Throughout the course of the program, trip completion rates have risen as trip not accepted rates have fallen. Over the last four quarters (Q3 2023 to Q2 2024), trip completion rates have stayed relatively flat.

TNC WAV trip completion rates over the last year were lower than that of TNC non-WAV trip completion rates. Non-WAV trip completion rates averaged 96% over the last four quarters, while WAV trip completion rates for the entire program averaged 60% over the same period. In the three counties where TNCs requested funding, the overall trip completion rate was 68%, with 83% in San Francisco, 75% in San Mateo and 66% in Los Angeles.

Figure 6: Completed trips compared to not accepted trips



Trips Cancelled by Passengers and Drivers

Trip Cancellations Remained Low Relative to Volume of Requested Trips

Trip requests can be cancelled by either the passenger or driver. When a request is cancelled by a driver, the WAV application reassigns it to another available driver. However, when a request is cancelled by a passenger, the action terminates the request and the passenger needs to request another trip.

Figure 7 shows the quarterly trend in WAV trip cancellations relative to all requested trips. Trip cancellations by driver continue to remain low and the percentage of passenger cancellations has remained steady, averaging 25% from Q3 2023 to Q2 2024.

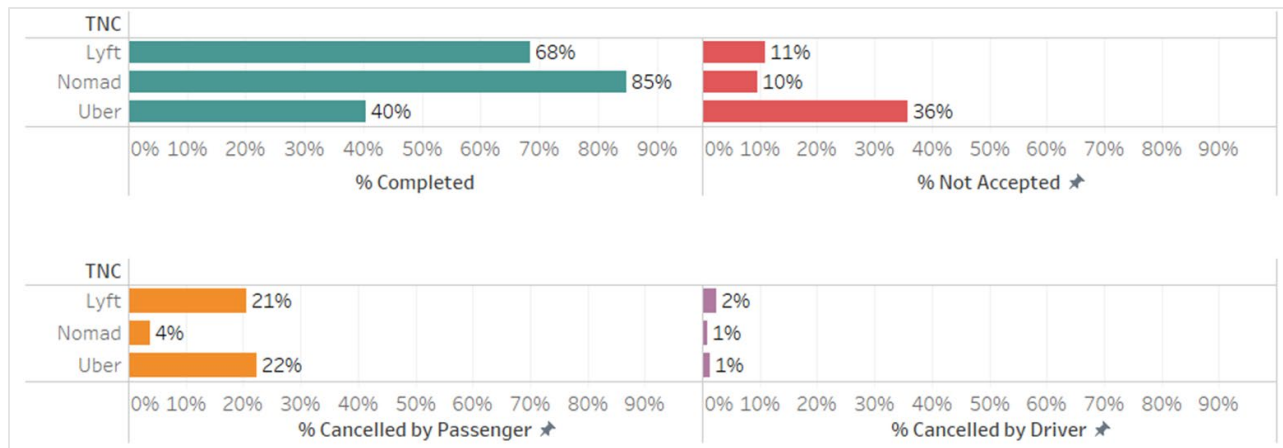
Figure 7: Cancelled WAV Trips as a Percentage of All Requested Trips



Wheelchair Accessible Vehicle Trip Outcomes by Transportation Network Company

Figure 8 shows the percentage of trip outcomes as a share of all requested trips received by TNCs. The “% completed” in Figure 8 is equivalent to the trip completion rate that the CPUC adopted in D.21-03-005. When comparing Q3 2019 to Q4 2021 data to Q3-2019 – Q2 2024 data, Uber’s percentage of completed trips increased from 29% to 40% and their percentage of not accepted trips decreased from 51% to 36%. Lyft’s percentages remained relatively consistent across the time period. Passenger initiated cancelations remain the main cause of trip cancellations.

Figure 8: Overview of Trip Outcomes by TNC (Q3 2019 - Q2 2024)



Improved Level of Service

Response Time Standard

One of the key requirements for TNCs to qualify for offsets is demonstrating improved level of service. P.U. Code § 5440.5(a)(1)(B)(ii) requires TNCs to demonstrate in a geographic area “improved level of service, including reasonable response times, due to those investments for WAV service compared to the previous quarter....” In D.20-03-007, the CPUC adopted the Offset Time Standard (OTS) to evaluate improved level of service as shown in Table 3 and Table 4. The Trip Completion Standard was later added in D.21-03-005 as shown in Table 6. Subsequently, D.21-11-004 further refined the Standards and renamed it the Offset Response Time Benchmark (ORTB) as shown in Table 5, Table 7, and Table 8 below. Both the OTS and the ORTB consist of two levels of response time benchmarks and percentages of completed trips for three different county groups.

Table 3: Offset Response Time Benchmarks: Response Time (minutes)

Geographic Area/County	Group	Level 1 WAV Response Time (mins)	Level 2 WAV Response Time (mins)
San Francisco	A	15	30
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	B	25	50
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	C	30	60

Table 4: Offset Time Standard (percentage) Effective Q2 2020 – Q1 2022

Offset Time Standard – Effective Date	Must meet at least one of:	
	Level 1 Offset Service	Level 2 Offset Service
Q2 2020 until Q1 2022	50% of completed trips are within Level 1 response times	75% of completed trips are within Level 2 response times

Table 5: Offset Time Standard (percentage) Effective Q2 2022 - Present

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

Note: 1st Quarter does not correspond to Q2 2022, it corresponds to the first quarter a TNC submits an offset request for a given county. From there, the standard begins to increase whether or not the TNC submits requests in subsequent quarters.

Table 6: Trip Completion Standard (effective Q2 2021-Q2 2022)

Trip Completion Standard	Must meet at least one of:	
	Number of Completed Trips	Percentage of Completed Trips
Q2 2021 until Q1 2022	Improvement (higher) than prior quarter	Improvement (higher) than prior quarter

Table 7: Trip Completion Standard (effective Q2 2022 - Present)

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

Table 8: Trip Completion Schedule by county group (effective Q2 2022 - Present)

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

Table 3 through Table 5 above summarize the response time and percentage requirements by county groups. To demonstrate improved level of service in a particular county where a TNC is requesting an offset, response times must either be within the Level 1 or 2 benchmarks. Level 1 represents the 50th percentile of all completed trips while Level 2 represents the 75th percentile. Effective Q2 2022 (shown in Table 5), the CPUC further refined the initial OTS percentage requirement to require TNCs to 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 Benchmark (ORTB).

In D.21.03-005, the CPUC added the Trip Completion Standard, effective starting Q1 2021 which requires a TNC to increase the number or percentage of completed WAV trips in the prior quarter.

Shortly after, the Trip Completion Standard framework was replaced, effective Q2 2022, which requires a TNC to meet the minimum percentage of trip requests completed, and increase the number of completed WAV trips.

Response Times

In D.20-03-007, response time is defined as the time between when a WAV ride was requested and when the vehicle arrived. Each quarter, TNCs provide response time data on completed WAV trip requests in deciles for each county in which they are seeking an Offset or Exemption¹². In addition, response times are divided into the time elapsed from when a trip is requested until the trip is accepted (Period A) and the time elapsed from when a trip is accepted until the vehicle arrived (Period B). Overall response time data from Q3 2019 to Q2 2024 show that completed WAV trips are generally under the required benchmarks by county. Table 9 below summarizes the quarterly response times by county and TNC.

Table 9: Quarterly Level 1 Response Times by TNC and County compared to Level 1 Response Time Benchmarks

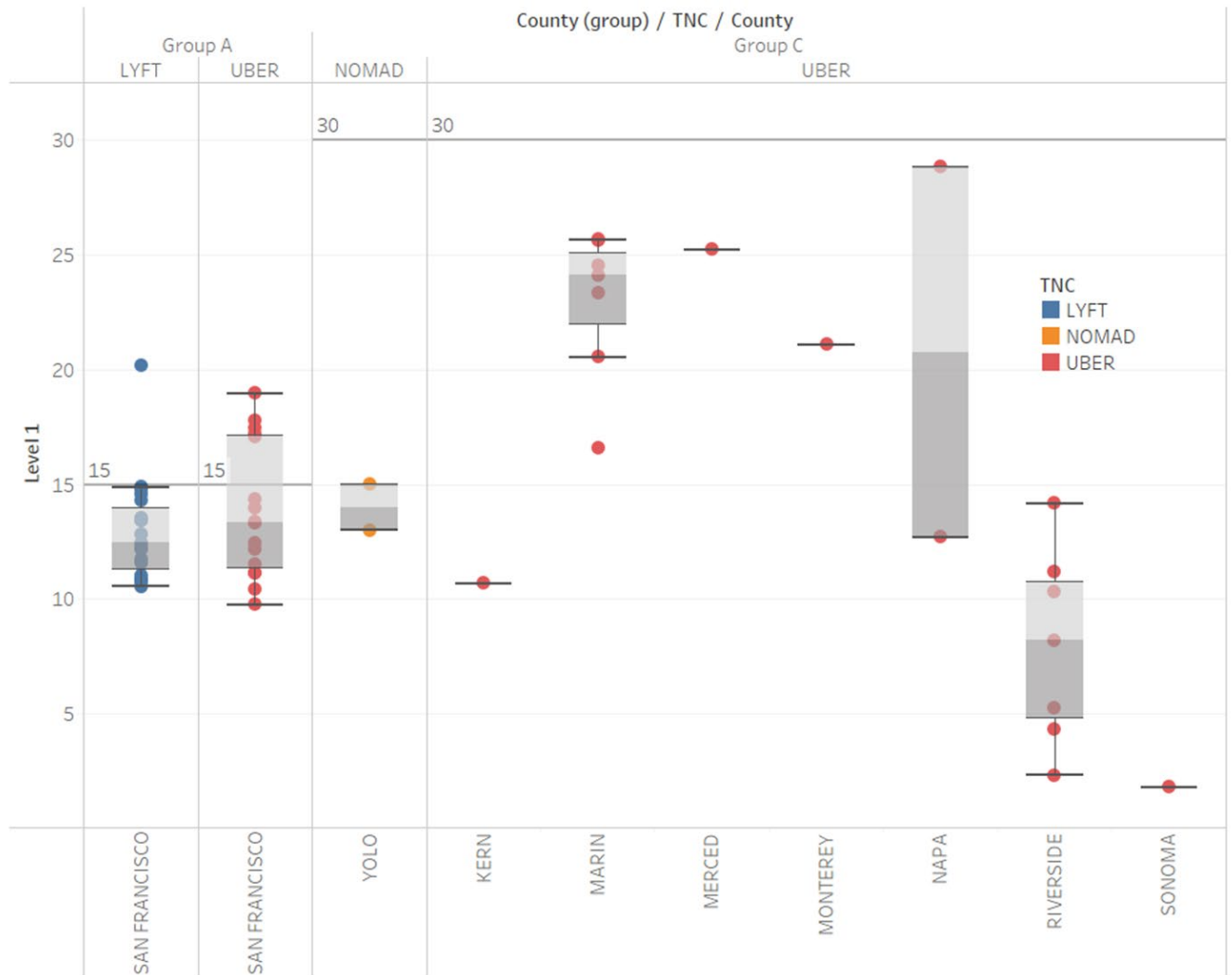
TNC	County	Response Time (minutes)									
		Track 4 Decision Standard (Level 1 – Shifting Scale)									
		Level 1 Benchmark	Q2 2022	Q3 2022	Q4 2022	Q1 2023	Q2 2023	Q3 2023	Q4 2023	Q1 2024	Q2 2024
Uber	San Francisco	15		14			14	12	10	11	10
	San Mateo	25	17		15		17	15	16	16	
	Los Angeles	25					19	19	17	17	17
	Alameda	25	16								
	Solano	25			13						
Lyft	Los Angeles	25	21	21	22	21	20	19	21	21	19
	San Francisco	15	12	12	12	12	12	11	11	11	11

An examination of the distribution of quarterly Level 1 response times by county groups also reveals noteworthy trends. Figure 9 and Figure 10 below use a chart called a box plot to illustrate the median value, spread or variation, minimum, and maximum of the data among the quarterly response times, with each dot representing a unique quarter. In San Francisco under Group A, the response times for Lyft show a service that has a more consistent performance in that there is low

¹² An Exemption allows a TNC to retain Access Fees collected for one year if a TNC can demonstrate meeting a higher performance standard the CPUC establishes.

variation in response times across quarters (evident in the comparatively shorter box plot) and largely remain within the 15-minute benchmark required for Group A.

Figure 9: Distribution of Level 1 Response Times in County Group A and C (Q3 2019 - Q2 2024)



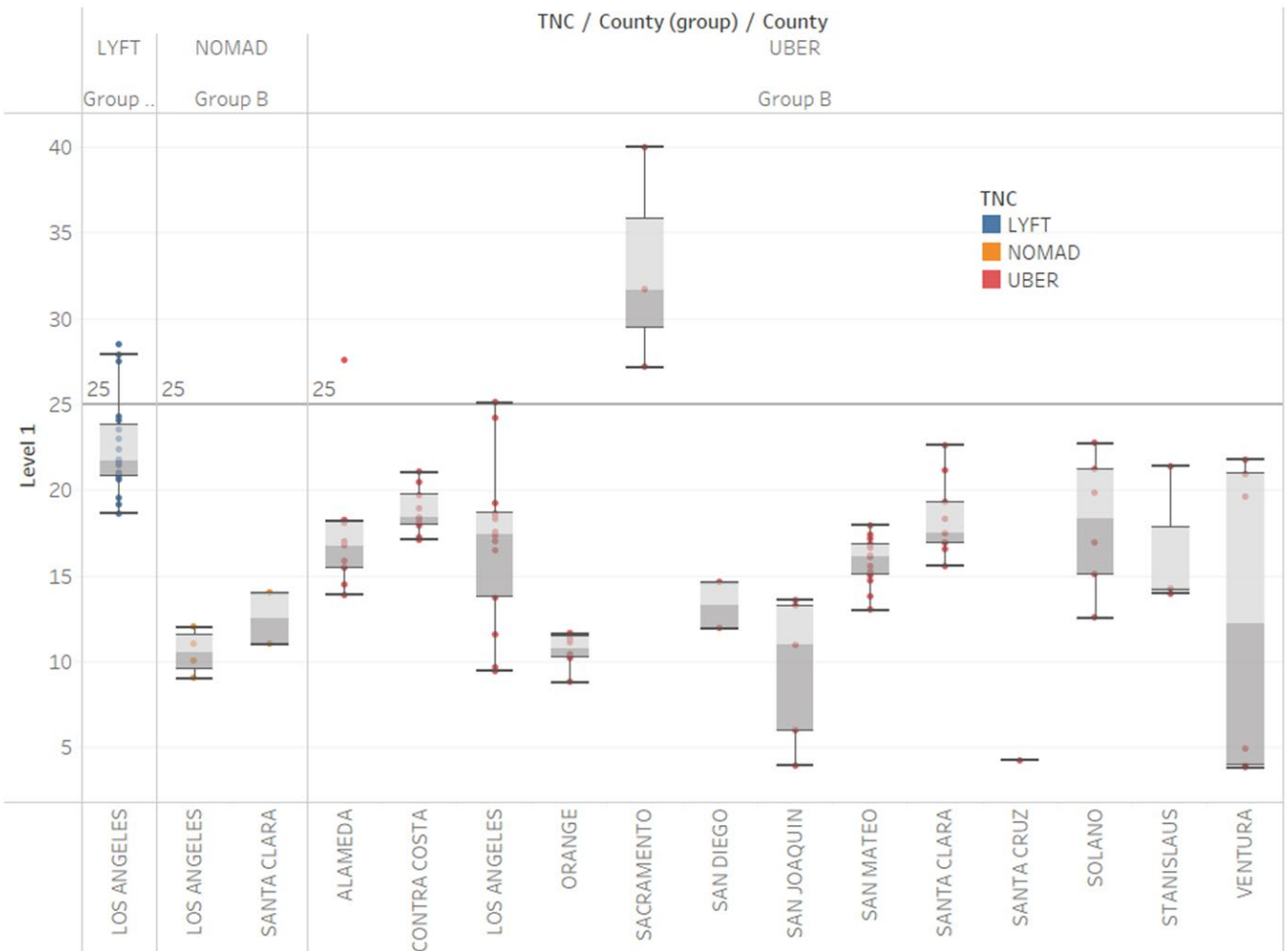
The distribution of response times in counties under Group C exhibits significant variation. As the box plots in Figure 9 illustrate the response times in Yolo, Marin, and Riverside are different. Response times in Yolo were between 13-15 minutes, response times in Riverside fluctuated between 2-14 minutes and response times in Marin ranged between 17-26 minutes. These variations in the quarterly response times among counties in Groups A, B, and C suggest that the current county grouping does not reflect actual similarities in response times. The original design of the county groups was derived by grouping counties based off non-WAV TNC response times and number of overall TNC trips per capita. Part of the discrepancy here may be the application of pre-COVID standards to post-COVID transportation patterns, but it is clear that the county groupings

do not lead to uniform outcomes within groups. This observation calls for further analysis to understand why on-demand WAV service in certain counties within a group performs better than in other counties within the same group, and what can be done to improve service in under-performing counties.

As seen in Figure 10, the distribution of response times in counties under Group B shows that Group B counties experience more variable response times than in San Francisco, like the Group C counties. Figure 10 below shows that generally most response times are within the 20 to 25-minute range. The response times in counties with shorter box plots like San Mateo, Orange, and Contra Costa fluctuated less over time than those in counties with taller box plots like Los Angeles (Uber) and Ventura.

There are also notable variations across TNCs. For example, the response times for Los Angeles indicate that the median response time for Lyft was within 21-24 minutes, with 50% of quarters within the required 25-minute benchmark for Group B. The two quarters that fell outside of the benchmark were all at the beginning of the Program. Conversely, Uber responded to requests in Los Angeles within 9-25 minutes. Nomad's response times of 9-12 minutes in Los Angeles, on the other hand, represented a narrower spread and less fluctuation.

Figure 10: Distribution of Quarterly Level 1 Response Times in Group B Counties (Q3 2019-Q2 2024)



Wheelchair Accessible Vehicle vs Non-Wheelchair Accessible Vehicle Response Times

Table 10 shows the comparison of WAV and non-WAV response times. We chose Q1 2022 WAV response times as the basis for this comparison because it was the latest quarter that contained the most data for multiple counties and appeared to reflect the diminished impact of the COVID-19 pandemic. Uber was not required to report response times for many of the preceding quarters because they did not request an offset. Non-WAV TNC data is reported on an annual basis every September, which is inclusive of data from September 1st of the previous year to August 31st of the reporting year. Staff chose to include a full year’s worth of non-WAV data response times to reduce anomalies that may be represented in smaller subsets of the data.

Median WAV response times continue to be slower than non-WAV response times across all counties but do meet or exceed the Program’s WAV response time benchmarks in most cases. When comparing WAV and non-WAV response times in minutes, Los Angeles has the largest

variance for both Uber and Lyft. Ventura County’s WAV response times (21 minutes) most closely reflect non-WAV (14 minutes) response times for Uber.

Table 10: Q1 2022 WAV and Q3 2021 – Q3 2022 Non-WAV Response Time Comparison (in minutes)

TNC	County	Response Time Benchmark (mins)	Q1 2022 WAV Median Response Time (50th Percentile)	Q3 2021 - Q3 2022 Non-WAV Median Response Time (50th Percentile)	Difference Between WAV and Non-WAV Response Times
Lyft	Los Angeles	25	21	8	13
Lyft	San Francisco	15	13	6	7
Uber	San Francisco	15	13	5	8
Uber	Santa Clara	25	19	7	12
Uber	San Mateo	25	15	6	9
Uber	Ventura	25	21	14	7
Uber	Los Angeles	25	24	9	16
Uber	Contra Costa	25	21	10	11
Uber	Alameda	25	17	7	10
Uber	Solano	25	17	10	7

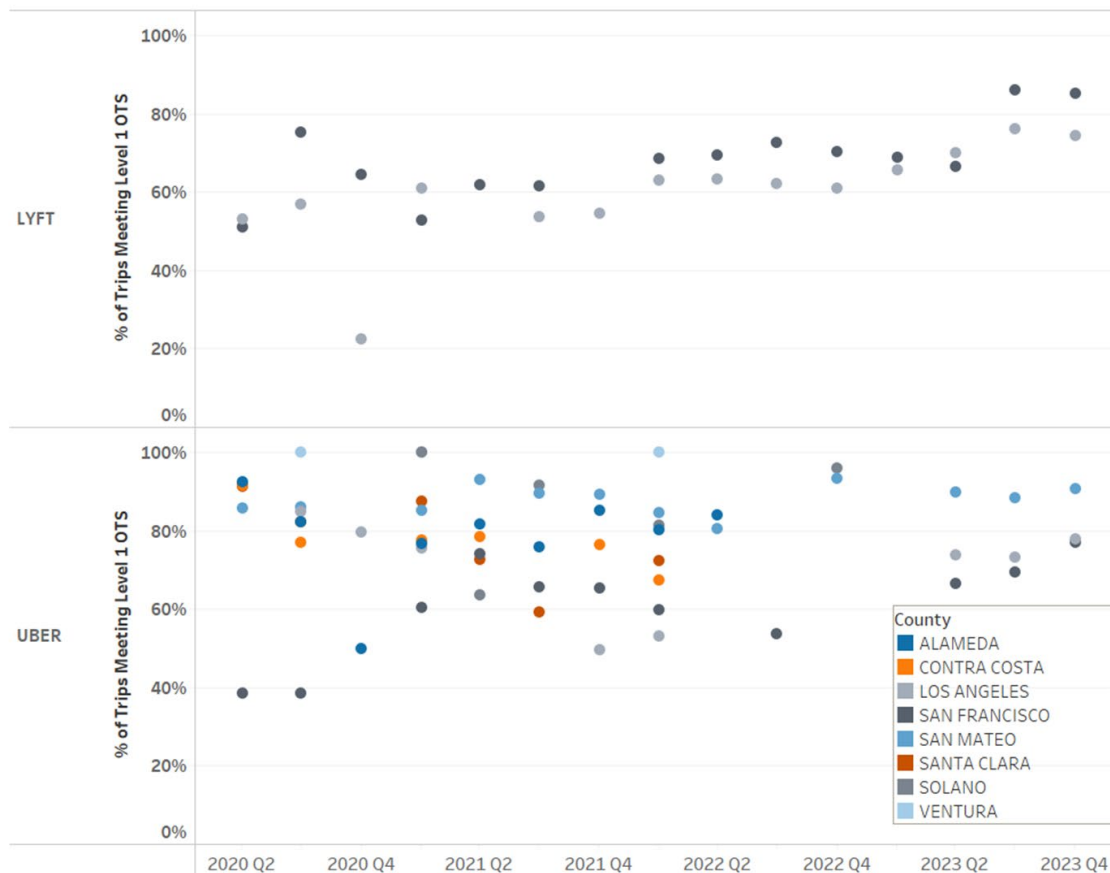
Response Time Standard Performance

The Percentage of Reported WAV Trips That Pick Up the Rider Within the Required Response Times Are Above the 50 Percent Minimum in All Counties

In addition to meeting the response time benchmarks to show improved level of service, TNCs requesting offsets must also exceed the percentage of trips that picked up the rider within the respective response time benchmarks in the prior quarter’s submission (see Table 4 and Table 5). Figure 11 below shows the distribution of Level 1 OTS percentages by county across TNCs.¹³ Uber’s average OTS percentage from Q1 2022 to Q2 2024, across all counties was approximately 78%, and Lyft’s average was 70%. During the reporting period, Lyft has averaged consistently higher OTS Level 1 percentages in San Francisco compared to Los Angeles, with one exception occurring in Q2 2023. Since Q2 2022, Uber has requested offsets for fewer counties, which has led to less data being reported. In Q1 2023, Uber did not report any data because no offset was requested for any county.

¹³ Reporting requirements for Offset Time Standards were implemented for the Q2 2020 reporting cycle.

Figure 11: Level 1 (50%) Offset Time Standards by TNC from Q2 2020 to Q2 2024



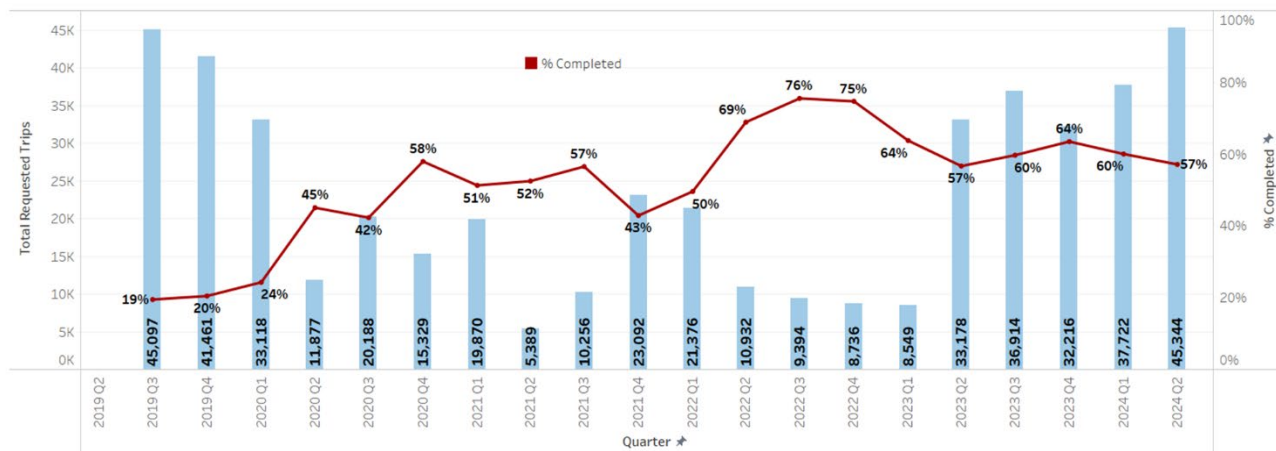
Trip Completion Standard

Trip Completion Rates Steadily Increased Until Leveling Out in 2023

In D.21-03-005, the CPUC adopted the Trip Completion Standard (TCS) as an additional measure to demonstrate improved level of service. TCS requires a TNC to increase the number or percentage of completed trips as a share of total requested WAV trips compared to the previous quarter in that geographic area. TCS became effective starting in Q2 2021, but the data for number and percentage of completed trips were already being submitted since Q3 2019.

Figure 12 shows the total percentage of completed trips in the Access for All Program. In 2022, TNCs reached the highest percentage trip completion rate at approximately 70%. In Q2 2023, the TNCs completed nearly double the number of trips compared to any of the prior quarters, as can be seen in Figure 13. According to D.20-03-007, TNCs do not have to submit WAV data when an offset is not requested. There has been a decline in the rate of trip completions since 2022, but the 57% rate achieved in Q2 2024 is approximately the average historical rate achieved in prior quarters.

Figure 12: Quarterly Total Completed Trips and Trip Completion Rate

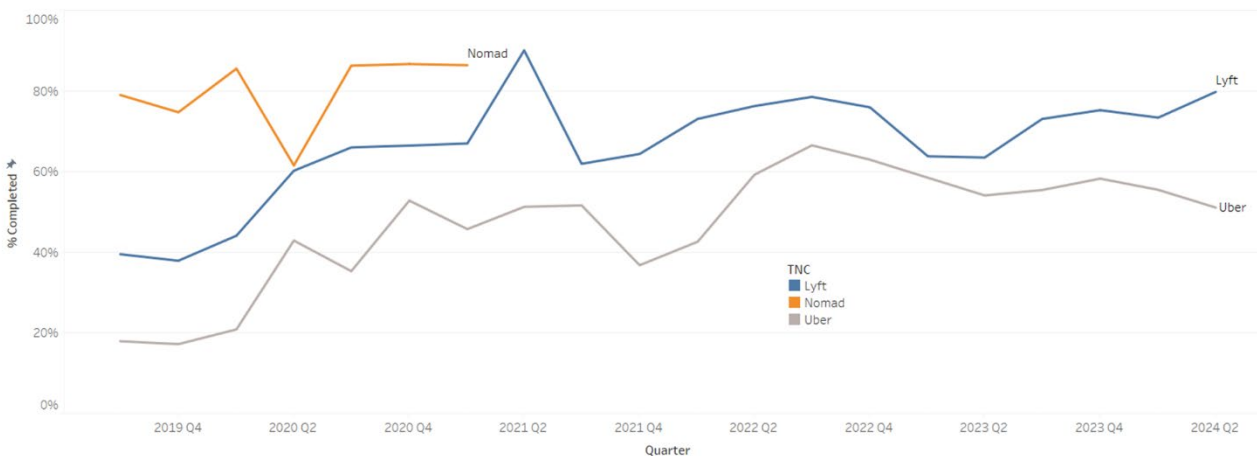


Uber completes a higher number of WAV trips than Lyft in most quarters in which they request offsets. Lyft routinely requests offsets for both Los Angeles and San Francisco Counties, which has attributed to higher completed trips totals in 2022 as seen in Figure 13. Lyft has maintained a higher trip completion percentage than Uber since the start of the Access for All Program, averaging 67% to Uber’s 46%, as seen in Figure 14.

Figure 13: Quarterly Total Completed Trips by TNC



Figure 14: Trip Completion Rate by TNC



Funds Expended

P.U. Code Section 5440.5(a)(1)(B)(ii) provides that the CPUC shall require a TNC to demonstrate in a geographic area full and detailed accounting of expenses to verify how funds were expended. D.20-03-007 adopted the following requirements, which TNCs must submit with their quarterly offset requests:

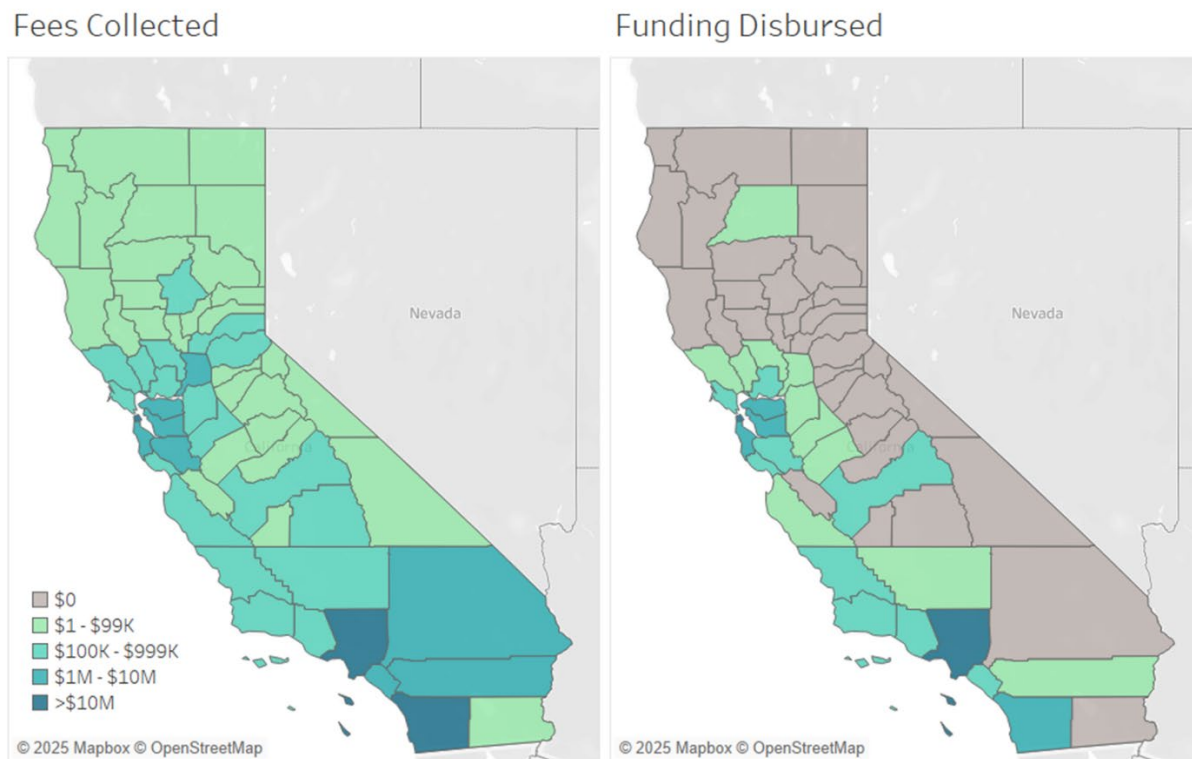
A completed “Eligible WAV Expenses” worksheet indicating how the funds were expended in a given quarter and list the amount expended for each item. A qualifying offset expense includes: (1) a reasonable, legitimate cost that improves a TNC’s WAV service, and (2) incurred in the quarter for which a TNC requests and offset. See Appendix B – Eligible Wheelchair Accessible Vehicle Expenses to view eligible cost categories.

TNCs Have Expended \$73 Million, Requested \$48 Million in Offsets, and Been Reimbursed \$43 Million Over the Course of the Program

Funds expended can be examined in three ways.

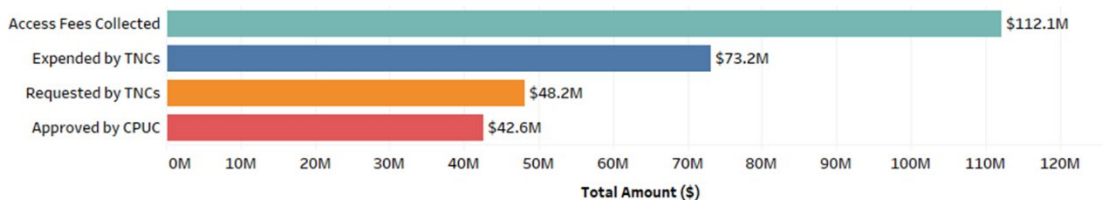
1. **Expended.** The expenditure data reported by TNCs with their advice letter offset filings represent the full amount invested according to the eligible cost categories listed in Appendix B – Eligible Wheelchair Accessible Vehicle Expenses.
2. **Requested.** In most quarters, TNCs do not request offsets for all expenditures because the maximum amount that can be offset is capped to the total Access Fees collected in a particular county and quarter. The requested amount is the actual offset requested in TNCs’ advice letter filings.
3. **Approved.** The approved amount is the amount of Access Funds TNCs were reimbursed after Staff review of offset advice letters; if the effective performance standards for that county and quarter were met, Staff approves the Requested Offset.

Figure 15: Fees Collected and Dispersed to TNCs and LAFAs (Q3 2019 to Q2 2024)



While significant funding has been collected in most counties, most of the funding expended has been in coastal or San Francisco Bay area counties. Most of the funding is collected and dispersed in Los Angeles and San Francisco counties. This is due to the higher density of these counties that make on-demand TNC and WAV services more viable than counties with lower density. There are many counties where funds have been collected but none have been expended, and this may be due to the low total amount of funds collected in many of these locations.

Figure 16: WAV Expenditure to Date (Q3 2019 – Q2 2024)



The overall trend shows that total quarterly WAV-related expenditures have varied over time. However, this does not necessarily mean that costs of providing WAV service have gone down when expenditures go down or that the costs have gone up when expenditures go up. Under Appendix A in D.20-03-007, the main categories of eligible WAV-related expenses include vehicle,

partnership, marketplace, operational, and other costs. These are further divided into sub-categories as summarized in this Report’s Appendix B – Eligible Wheelchair Accessible Vehicle Expenses.

To date, TNCs have expended over \$73 million in their WAV service programs from Q3 2019 to Q2 2024, as shown in Figure 15. Approximately \$48 million have been requested in the offset process, of which \$43 million have been reimbursed to TNCs since Q3 2019 for trips that meet the Program’s performance thresholds. The \$5.6 million difference between total costs requested and approved represents the offset amounts requested that were disallowed for not meeting the offset standards. For example, Uber requested offsets totaling \$977,055 for 13 counties in Q1 2021. However, only 9 counties met all the offset requirements. The approved offsets for the remaining 9 counties that met the eligibility criteria were about \$299,747. For Q3 2021, Uber requested about \$635,399 for 7 counties, but the OTS percentages in three of those counties (Alameda, San Francisco, and San Mateo) did not show improvement from the prior quarter. Therefore, Staff approved only about \$62,569 for the remaining 4 counties that met all the offset requirements.

Figure 17 and Table 11 below break down expenditures into five main categories. About \$68 million (94%) of total TNC expenditures from Q3 2019 to Q2 2024 cover partnership costs, which mostly include costs associated with contracting third-party WAV providers. The remaining 6% was spread across all other categories. When examined at a TNC level, Uber and Lyft differ in how they allocate funding; Uber spent 98% of their expenditures on partnership costs whereas Lyft spent 85%, with the remaining 15% primarily spent on operational costs for wages, salaries, and benefits for non-maintenance personnel.

Figure 17: Percent of WAV Expenditures by Category and TNC (Q3 2019 – Q2 2024)

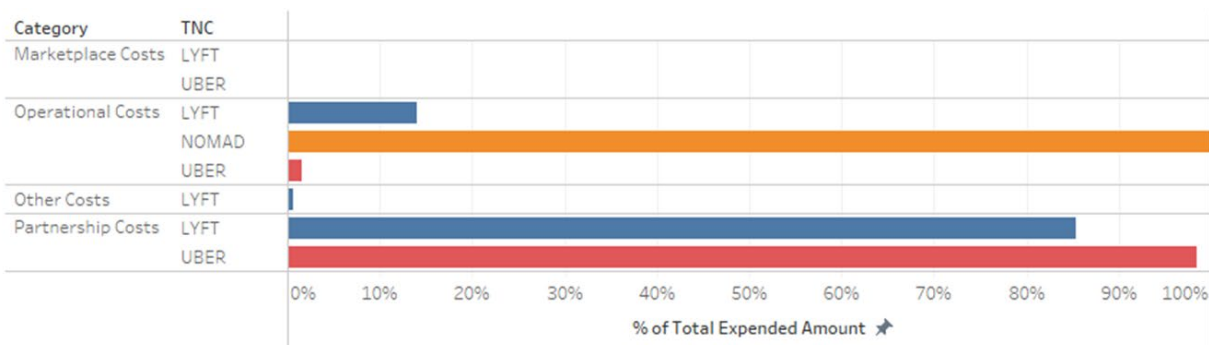


Table 11: Total WAV Expenditures by Category and TNC

TNC	Category				Grand Total
	Marketplace Costs	Operational Costs	Other Costs	Partnership Costs	
LYFT	\$9,986	\$3,069,702	\$127,400	\$18,723,670	\$21,930,758
NOMAD		\$687,201			\$687,201
UBER	\$19,197	\$768,400		\$49,769,429	\$50,557,027
Grand Total	\$29,183	\$4,525,304	\$127,400	\$68,493,100	\$73,174,986

TNCs Invested More in WAV Service than they Requested from the Program, and Received Most but Not All of the Funds they Requested

Figure 18 below breaks down quarterly WAV expenditures by type, through quarters impacted by COVID-19, which illustrates declining expenditures since the Program's inception in Q3 2019. Expenditures were highest in Q1 2020 when total offset amounts requested or approved were slightly above \$4 million, and lowest in Q2 2021 when total offset amounts requested or approved were just below \$1 million. This notable decline in WAV-related expenditures coincides with quarters that were heavily impacted by the pandemic. Such a downward trend is expected as TNCs adjust their investments to reflect the decline in demand for WAV service. This correlation between WAV demand and expenditures is notable after the Q2 2021 to present period in which total costs begin rising with the increase in demand as COVID-19 conditions improve with greater availability of vaccines. The sharp decline in Q1 2023 is due primarily to Uber not submitting any offset requests in that quarter.

Figure 18: Quarterly WAV Expenditures: Requested vs. Approved

TNC Expenses vs Approved Offsets

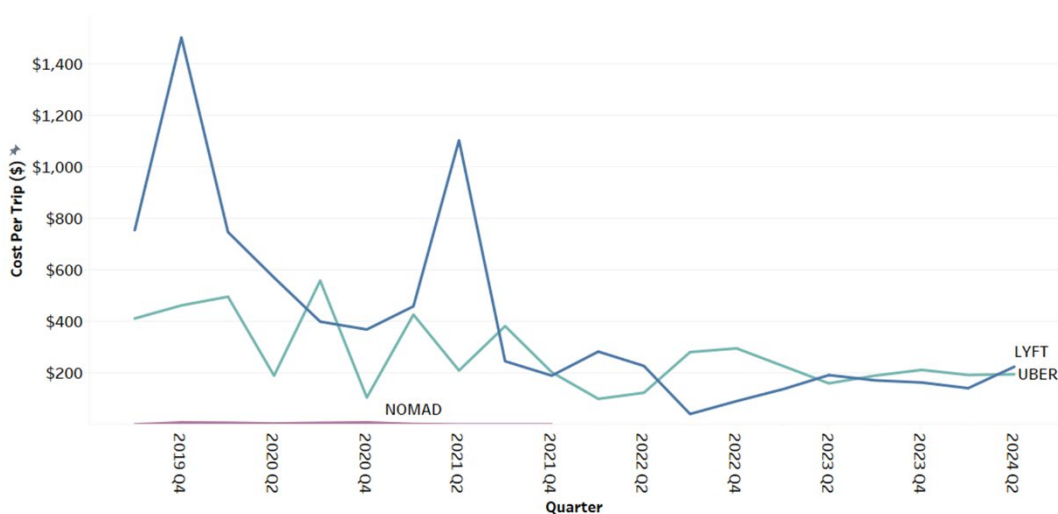


Based on TNCs’ Reported Expenditures, Per-Trip Cost to the Program Has Declined Over Time but Remains High. However, Decreasing Overall Expenditures and Increasing Ridership Could Lead to a Reduction in Per-Trip Cost.

The downward trend in quarterly WAV-related expenditures, however, does not necessarily translate to declining cost per WAV trip. Figure 19 below illustrates quarterly cost per WAV trip in which total approved offsets (\$) were divided by total completed trips. Per-trip cost can be calculated in three ways, dividing either total quarterly expended, requested, or approved amounts by total quarterly completed trips. For the purposes of this report, cost per trip is based on total approved offset amounts to reflect the actual cost to the Program as only WAV expenditures in eligible counties are reimbursable.

Early costs per trip were volatile, but as the program has progressed, trip costs have normalized and converged to an extent. Uber and Lyft’s costs per trip over the last year remain around \$185 despite a decline in total requested offset amounts for both TNCs over time, while Nomad’s cost per trip was low during its operation of WAV service. Per trip costs average \$400 for Lyft (\$145 over the last 8 quarters) and \$273 (\$218 over the last 8 quarters) for Uber since the inception of the Program. In Q2 2021, Lyft’s per trip cost was as high as \$1,100 while the highest for Uber was about \$560 in Q3 2020. The lowest cost per trip for Lyft was \$41 per trip in Q3 2022 and the similar lowest cost per trip for Uber was \$99 per trip in Q1 2022. With the decrease in overall WAV expenditures reported by TNCs in their offset requests and simultaneous increase in completed trips, the cost per trip has declined significantly in the last two quarters for Uber and Lyft. In Q2 2024, each WAV trip costs about \$195 for Uber and \$224 for Lyft.

Figure 19: Quarterly Cost Per WAV Trip by TNC

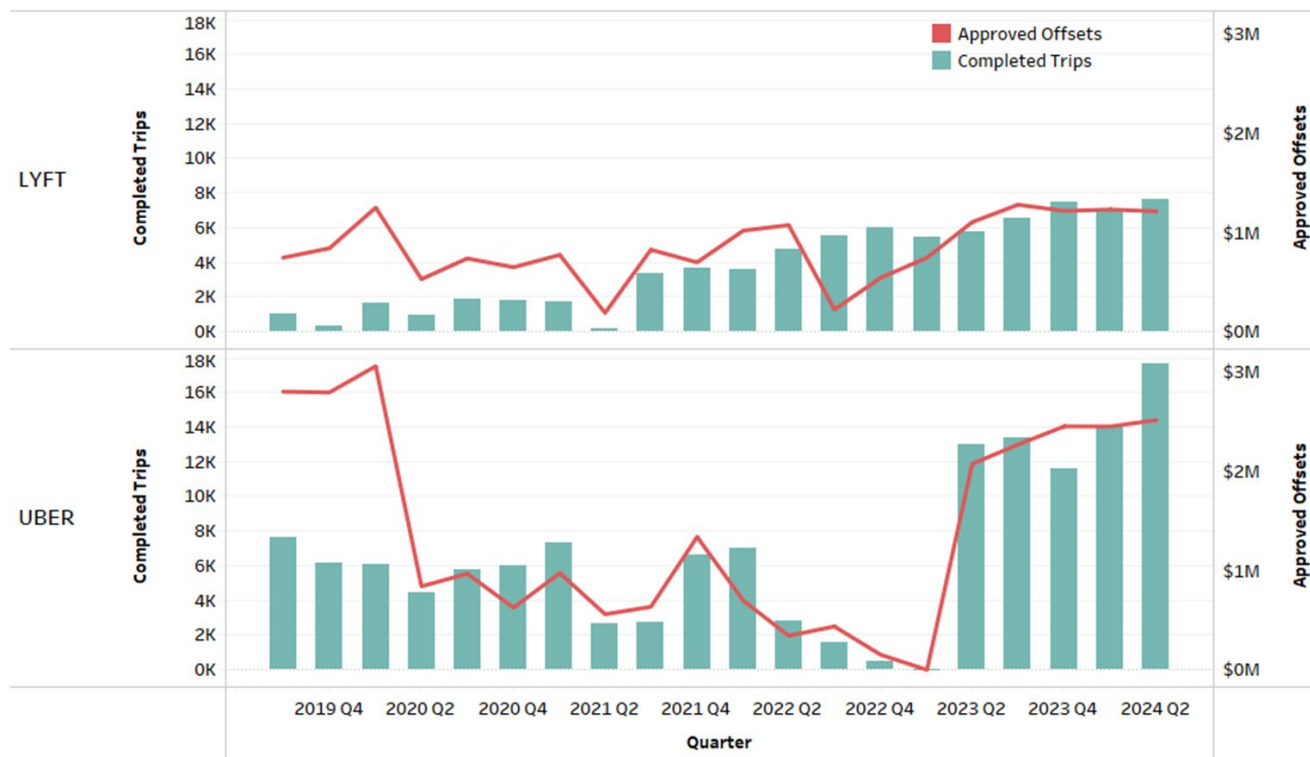


The significant gap in per trip costs across TNCs could be due to the fundamental difference in how TNCs provide WAV service. Uber and Lyft primarily contract with third-party WAV providers to supply WAV vehicles and drivers regardless of the level of demand to ensure providing a more responsive service. As observed above, these contracting costs make up most of total WAV-related expenditures reported by Uber and Lyft.

Currently, the average operating cost of a TNC-provided WAV trip (approximately \$150) is higher than demand-responsive services for the general public. Demand-responsive transit is a form of transit that transports passengers along flexible routes and on non-predetermined schedules in contrast to fixed-route/schedule transit. Examples of demand-responsive transit include paratransit, microtransit, and dial-a-ride services. The American Public Transit Association published the nationwide average operating cost per demand-response trip for 2021 in their 2023 Public Transportation Fact Book. For 2021, they calculated an average operating cost per demand-response trip of \$53.50. Post pandemic figures have not been released yet.

Although the TNC-provided on-demand WAV per-trip costs are still over \$150, the costs could continue to go down if WAV expenditures remain unchanged or fall further and WAV trip demand continues to grow within a specific geographic market. As Figure 20 illustrates, total WAV offsets (in red lines) for Lyft and Uber have declined compared to the first three quarters of the Program, while Lyft’s number of reported and completed trips has continued to improve and Uber’s number of reported and completed trips has varied significantly (both in blue bars).

Figure 20: Quarterly Total WAV Offsets and Completed Trips



Outreach

In geographic areas where TNCs request offsets, TNCs must demonstrate their efforts to publicize and promote available WAV services to disability communities. In their advice letter filings, TNCs provide evidence of their outreach efforts, including a list of entities they partner with in disability communities, how the partnership publicized or promoted WAV services, and marketing or promotional materials of those activities.

In addition to publicizing their respective WAV programs on their website and mobile apps, TNCs market to community groups and vulnerable and disadvantaged populations as shown in Table 12, which represents a unique method of outreach to an entity each quarter. Over the length of the Access of All Program, Lyft, Uber, and Nomad respectively conducted outreach in 288, 204, and 8 instances. Over the last year, Lyft has reported an additional 104 outreach efforts and Uber has

reported an additional 40 outreach efforts. Uber and Lyft most commonly provide outreach via email, presentations, and phone calls. Lyft and Uber do not currently provide evaluation metrics to determine the effectiveness of these outreach methods on increasing awareness of WAV services.

Table 12: Unique Methods of Outreach (Q3 2019 – Q2 2024)

Outreach Method	Lyft	Nomad	Uber	Grand Total
Blog post			1	1
Call and Email	5			5
Consultation			2	2
Direct marketing	11		4	15
Email	176	6	90	272
Event	1	1	2	4
In-app notification			2	2
Interview			21	21
Meeting	47			47
Partnership exploration			1	1
Phone call	39		15	54
Presentation	9		59	68
Social Media		1	4	5
Speaking engagement			2	2
Sponsorship			1	1
Grand Total	288	8	204	500

Each method represents an individual outreach effort. For example, Lyft has reported they have had 176 email correspondences with the local community.

To address the quality and effectiveness of a TNC's community outreach and engagement, effective July 1, 2023 a TNC seeking an offset must also develop and submit to CPUC an annual outreach plan with measurable objectives and goals and to submit quarterly updates as part of their offsets progress made towards implementing the outreach plan.¹⁴ As of Q2 2024, both Lyft and Uber have demonstrated meeting their July 2023 Outreach Plan.

Complaints and Comments

TNCs seeking an offset are also required by the CPUC to provide the number of complaints they received related to WAV drivers and services by quarter and geographic area. As ordered in D.20-03-007, WAV customer complaints must be also categorized as follows: securement issue, driver training, vehicle safety and comfort, service animal, stranded passenger, and other. Since the

¹⁴ See [D.23-02-024](#).

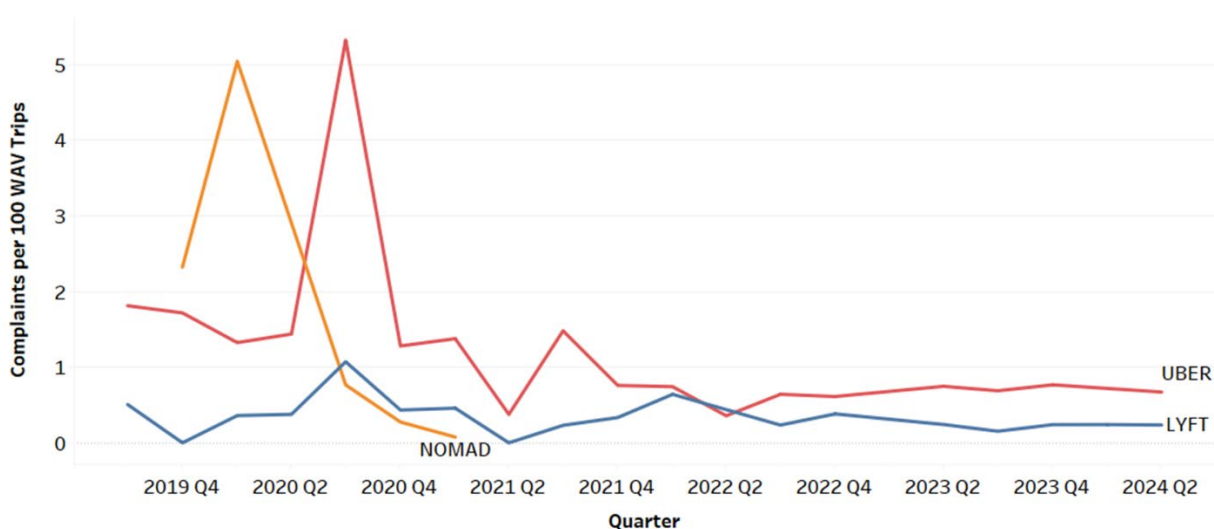
inception of the Access for All Program, a total of 1,461 customer complaints have been submitted to the TNCs. Uber accounted for 82% of the total customer complaints, Lyft accounted for 15%, and Nomad 3%. Compared to the total number of WAV trips requested of all TNCs, Uber has completed 75% of all WAV trips, Lyft has completed 24%, and Nomad has completed 1%.

Table 13: Customer Complaints (Q3 2019 – Q2 2024)

Complaint Category	Lyft	Nomad	Uber	Grand Total
Driving Training	31	12	81	124
Other	126	16	941	1,083
Securement Issues	8	1	2	11
Pickup and Drop-off	10		134	144
Vehicle Safety and Comfort	48	8	43	99
Grand Total	223	37	1,201	1,461

When requesting offsets, Uber has reported more customer complaints than Lyft in all but three quarters. However, trends in historical customer complaints are difficult to analyze because of the D.20-07-003 requirement to only report WAV data for quarters where an offset was requested. For example, data suggest that Uber has a slightly disproportionate share of customer complaints relative to their total number of completed WAV trips. However, Uber’s total share of WAV trips completed might be greater than reported because of the D.20-07-003 requirement to only report WAV data for quarters and counties where an offset was requested.

Figure 21: Quarterly Trend in Customer Complaints Weighted by TNC Total WAV Trips (Q3 2019 – Q2 2024)



Access Fee Remittance Exemption Standards: Review of Performance

Fee Remittance Exemption Requirements

Section 5440.5(a)(1)(G) provides that a TNC may be exempt from remitting quarterly Access Fund Fees in a geographic area if it satisfies certain requirements. The exemption allows a TNC to retain Access Fees collected for one year if a TNC can demonstrate meeting a higher performance standard than the CPUC establishes: “The Commission shall adopt a designated level of WAV service that is required to be met in each geographic area via a TNC’s online-enabled application or platform in order for the TNC to be exempt from paying the fee required...for the next year in that geographic area.”

In D.20-03-007, the CPUC adopted the Exemption Time Standard (later renamed to Exemption Response Time Benchmark (ERTB) in D.21-11-004) where a TNC must demonstrate the following:

- 1) 80% of its completed WAV trip response times achieve the corresponding Level 2 WAV response times, for a quarter in a geographic area, and
- 2) The TNC achieved the requisite response times for four consecutive quarters. To verify that a TNC achieved the Exemption Time Standard, a TNC must submit completed WAV response times, as well as Periods A and B, in deciles, for each qualifying quarter.

In D.21-03-005, the CPUC adopted the Trip Completion Standard (TCS) as an additional measure to demonstrate improved level of service for the four consecutive qualifying quarters for which it seeks an exemption. TCS requires a TNC to increase the number or percentage of completed trips as a share of total requested WAV trips compared to the previous quarter in that geographic area. TCS became effective starting in Q2 2021.

Subsequently in D.21-11-004, the CPUC modified the Exemption Standard to replace the existing ERTB and TCS requirement. As of Q2 2022, to qualify, a TNC must demonstrate:

- 1) 80% of its completed WAV trips met or exceeded the corresponding Level 1 Offset Response Time Benchmark (ORTB) for a given geographic area for four consecutive quarters, and
- 2) The TNC qualified for an offset in the given geographic area for the same four consecutive quarters.

To date, only Uber has demonstrated meeting the exemption standards for San Joaquin and Marin from Q3 2019 to Q2 2020, Contra Costa from Q3 2019 to Q3 2020, and Riverside and Orange

from Q3 2019 to Q4 2020. Although the TNCs haven't been able to qualify for exemptions under the modified Exemption Standards effective Q2 2022, the exemption standard is accomplishing its purpose: to reward a TNC that demonstrates high performance compared to the Offset Standards.

Fee Remittance Exemption Standards Analysis

Table 14 below summarizes the exemption response time benchmarks by county groups. As outlined above, the relevant response time for exemption is the response time for the 80th percentile of all completed trips for a particular county and quarter. It is important to note that exemption response time benchmarks represent faster response than offset response times and rely on different county groupings. Response times must be within the exemption response time benchmarks for four consecutive quarters for that county to qualify for an exemption. In addition, TNCs were also required to show improvement from the previous quarter in the overall percentage of completed trips within the Level 1 or 2 benchmarks.

Table 14: Offset Response Time Benchmark (ORTB) For Exemptions

Offset Response Time Benchmarks (ORTB)		
Geographic Area/County	Level 1 WAV Response Time (mins)	Level 2 WAV Response Time (mins)
San Francisco	8	16
Alameda, Los Angeles, San Diego, San Mateo, Santa Clara	10	20
Napa, Orange, Sacramento, San Luis Obispo, Santa Barbara, Yolo	12	24
Butte, Fresno, Kern, Monterey, San Bernardino, Santa Cruz, Solano	15	30
Contra Costa, El Dorado, Marin, Placer, Riverside, San Joaquin, Shasta, Sonoma, Stanislaus, Ventura	20	40
Del Norte, Humboldt, Imperial, Inyo, Kings, Lassen, Mendocino, Madera, Merced, Mono, Nevada, Plumas, Sutter, Trinity, Tulare, Yuba	25	50
Alpine, Amador, Calaveras, Colusa, Glenn, Lake, Mariposa, Modoc, San Benito, Sierra, Siskiyou, Tehama, Tuolumne	30	60

As seen in Appendix C, Uber met the exemption response time benchmark for four consecutive quarters in only nine of twenty-one total counties. As mentioned above, only one exemption request has been approved, which covers the quarters of Q4 2020 to Q3 2021 in the counties of Contra Costa, Orange, and Riverside. Neither Lyft nor Nomad met the exemption response times in the Program's operation. This outcome suggests that the exemption requirements are much more difficult to satisfy than the offset requirements. Given that more complete data reporting is needed

to evaluate how the addition of the Trip Completion Standard impacts exemption eligibility, as of Q3 2023, the CPUC now requires TNCs to report all data, even in counties where they are not requesting offsets. So far, TNCs have not offered any significant service in counties where they are not seeking an offset for their expenses.

Access Fund Administrators

Access Fund Administrators

In D.[20-03-007](#), the CPUC authorized Access Fund Administrators,¹⁵ a term used to refer to both the Local Access Fund Administrators (LAFA) and the Statewide Access Fund Administrator (SAFA) unless noted otherwise, to develop local WAV programs using Access Fund monies not claimed by TNCs in the offset process. [D.20-03-007](#) also tasked CPUC’s Consumer Protection and Enforcement Division (CPED) with developing these Program Requirements for: the selection of LAFAs; Access Fund Administrators’ disbursement of funds; and Access Fund Administrator compliance with data reporting requirements.¹⁶ Access Fund Administrators assist CPED by administering the local WAV program, and by contracting with and obligating available funds to eligible Access Providers on an annual basis.¹⁷ Per [D.21-03-005](#), up to 15% of the total allocated funds may be used by the corresponding Access Fund Administrator to cover costs of administering the Program. The remaining 85% shall be allocated to Access Providers within its jurisdiction in accordance with the rules set by the CPUC.

Roles and responsibilities of an Access Fund Administrator

The primary role of an Access Fund Administrator is to administer the Access for All Program in the geographic area(s) within its jurisdiction. Specifically, Decision [D.20-03-007](#) tasks Access Fund Administrators with developing local WAV programs and contracting with and obligating available funds to eligible Access Providers in accordance with criteria adopted by the CPUC. An Access Fund Administrator has the following responsibilities:

1. Submit an application to the CPUC certifying that Access Fund monies will be obligated and liquidated in accordance with the requirements established by the CPUC¹⁸
2. Submit an Affidavit certifying all is true and correct under penalty of perjury and agreeing to be subject to the CPUC rules and jurisdiction
3. Establish a process for Access Provider solicitation
4. Select Access Providers to receive Access Fund monies based on criteria adopted by the CPUC and outlined in these Program Requirements
5. Obligate available Access Fund monies to selected Access Providers
6. Submit a Consolidated Quarterly Report to the CPUC in a format specified by CPED based on the Quarterly Reports submitted to the Access Fund Administrator by Access Providers

¹⁵ See [D.21-03-005](#).

¹⁶ See [Access for All Program Overview and Requirements](#).

¹⁷ See Notice of Fund Availability under “[Funding](#)”.

¹⁸ See Application under “[Application instructions/Forms](#)”.

7. Submit annual and other quarterly reports to ensure that progress is made toward the broader goals and objectives of the Program and SB 1376

Local Access Fund Administrators

Decision [D.20-03-007](#) later modified in [D.23-02-024](#) limits the entities that may serve as LAFAs. They include Metropolitan Planning Organizations (MPOs), Regional Transportation Planning Agencies (RTPAs), County Transportation Commissions (CTCs), and Public Transit Agencies. Currently, there are 18 MPOs and 21 RTPAs, covering California’s 58 counties, as shown Appendix D – Entities Conditionally Selected as Local Access Fund Administrators in are considered “conditionally selected” as a LAFA, contingent upon their agreement to accept and fulfill the requirements established by the CPUC.

Approved Access Fund Administrators are required to establish a process for Access Provider solicitation; select, contract with and obligate available funds to eligible Access Providers by July 1; and begin obligating Access Fund monies to selected Access Providers by July 1 (the following year). Access Fund Administrators shall continue to obligate Access Fund monies to selected Access Providers annually until all Access Funds have been liquidated. The selected Access Fund Administrator shall start the project within 30 days upon award and complete the project execution (develop, solicit, award, liquidate) within a 24-month timeframe.

Local Access Fund Administrator Funding

To date, CPUC has awarded a total of \$35.7M Access Funds to Local Access Fund Administrators. Of the \$35.7M, \$12.4M was awarded in Cycle 4 for funding year 2024-2025. On April 1, 2024, the CPUC received 12 LAFA applications for Cycle 4, including four MPOs, two RTPAs, four CTCs, and two Public Transit Agencies. On June 20, 2024, the CPUC voted and passed [Resolution TL-19149](#) approving 12 Local Access Fund Administrators and their corresponding Access Fund awards.

Table 15: Access Fund Amounts Awarded Per LAFA

LAFAs Applicant	Entity Type	Geographic Areas Covered	Total Access Funding (Cycles 1-3)	Current Year Access Funding (Cycle 4)
Contra Costa Transportation Authority	CTC	Contra Costa	\$495,585	\$434,226
Fresno Council of Governments	MPO	Fresno	\$406,269	\$1,919,651
Los Angeles County Metropolitan Transportation Authority	CTC	Los Angeles	\$11,118,409	\$6,671,609
Redding Area Bus Authority	Transit	Shasta	\$5,726,632	\$59,645
San Diego Association of Governments	MPO	San Diego	\$4,4045,161	\$2,731,158
San Francisco Municipal Transportation Agency	Transit	San Francisco	\$145,824	\$1,713,063
San Luis Obispo County of Government	MPO	San Luis Obispo	\$404,536	\$68,497
Santa Cruz County Regional Transportation Commission	RTPA	Santa Cruz	\$152,818	\$155,823
Santa Barbara County Association of Governments	MPO	Santa Barbara	\$24,731	\$54,422
Solano Transportation Authority	CTC	Solano	\$198,742	\$94,210
Transportation Agency for Monterey County	RTPA	Monterey	\$189,154	\$82,658
Ventura County Transportation Commission	CTC	Ventura	\$353,861	\$143,823
TOTAL			\$23,261,722	\$12,400,785

Local Access Fund Administrator: Access Provider Solicitation

For funding cycle 3, the 12 Local Access Fund Administrators has successfully contracted with Access Providers in their respective counties to provide on-demand WAV services. For funding cycle 4, the 12 LAFAs are currently preparing the competitive procurement where the Call for Projects is developed. They will develop the Program goals, objectives, eligibility and evaluation criteria, grant agreements and the application selection process. Each LAFA is to select and contract with an Access Provider in their respective county by July 1, 2025.

Table 16: Access Provider Selection Utilizing Cycle 3 Funds as of July 1, 2024

LAFAs	Approved Access Providers
Contra Costa Transportation Authority	Tri-Delta Transit
Fresno Council of Governments	Fresno County Rural Transportation Agency Clovis Transit
Los Angeles County Metropolitan Transportation Authority	Administrative Services Cooperative The City of Santa Clarita Butterfli Technologies Inc. UCLA Transportation Ventura Transit Systems, Inc.
San Diego Association of Governments	Facilitating Access to Coordinated Transportation (FACT)
San Francisco Municipal Transportation Agency	Nomad Transit SF Green Cab TowerWAV
San Luis Obispo County of Government	Senior Go
Santa Barbara County Associations of Government	Paused due to insufficient funding available
Santa Cruz County Regional Transportation Commission	Community Bridges Lift Line
Solano Transportation Authority	Rio Vista Delta Breeze with the Pingo App Suisun Microtransit
Transportation Agency for Monterey County	Gateway Center for Monterey County
Ventura County Transportation Commission	Gold Coast Transit District and Ventura Transportation Services

Newly available data from LAFAs this year shows demand for WAVs in the thousands of ride requests each quarter, averaging 9,097 ride requests per quarter from Q3 2023 to Q2 2024. Trip completion rates for on-demand trips were 62%, but trip completion rates for pre-scheduled trips were much higher at 88%, for an overall trip completion rate of 73%.

CPED staff will continue to work with the LAFAs to monitor the progress of the Access Providers and collect ridership data from the Access Providers as it becomes available to further assess the performance of the Access Providers.

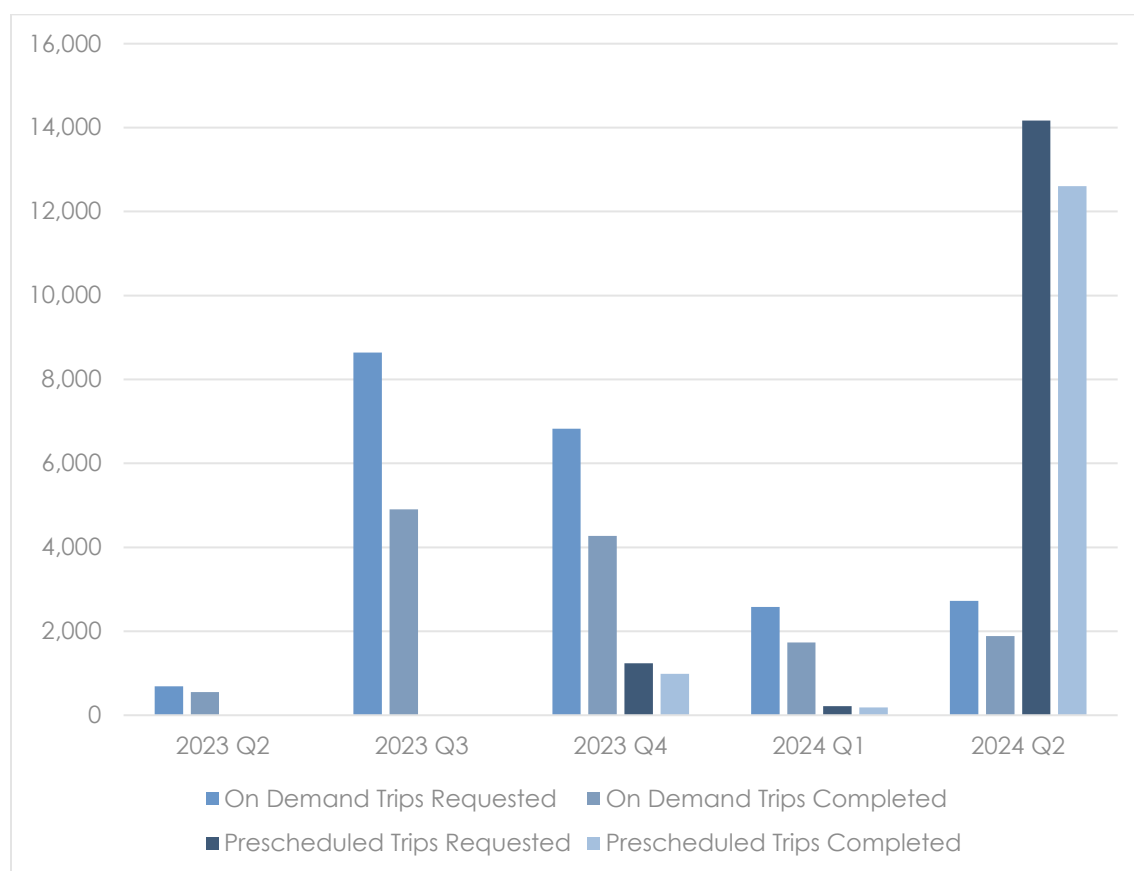
Local Access Fund Administrator Performance

Since the beginning of the program, LAFAs have overseen the completion of 27,164 rides, with an overall completion rate of 73%. While early service in the program's lifespan was focused on on-demand services, prescheduled trips have taken a prominent role in LAFAs' services. This is largely due to the Access Providers contracted by Los Angeles County Metropolitan Transportation Authority – ButterFli and Administrative Services Cooperative. As a taxi service, ASC treats all trips as prescheduled, while ButterFli previously allowed riders to schedule trips up to 24 hours in

advance. To better align with the AFA program’s goals, ButterFli has transitioned to only providing on-demand trips.

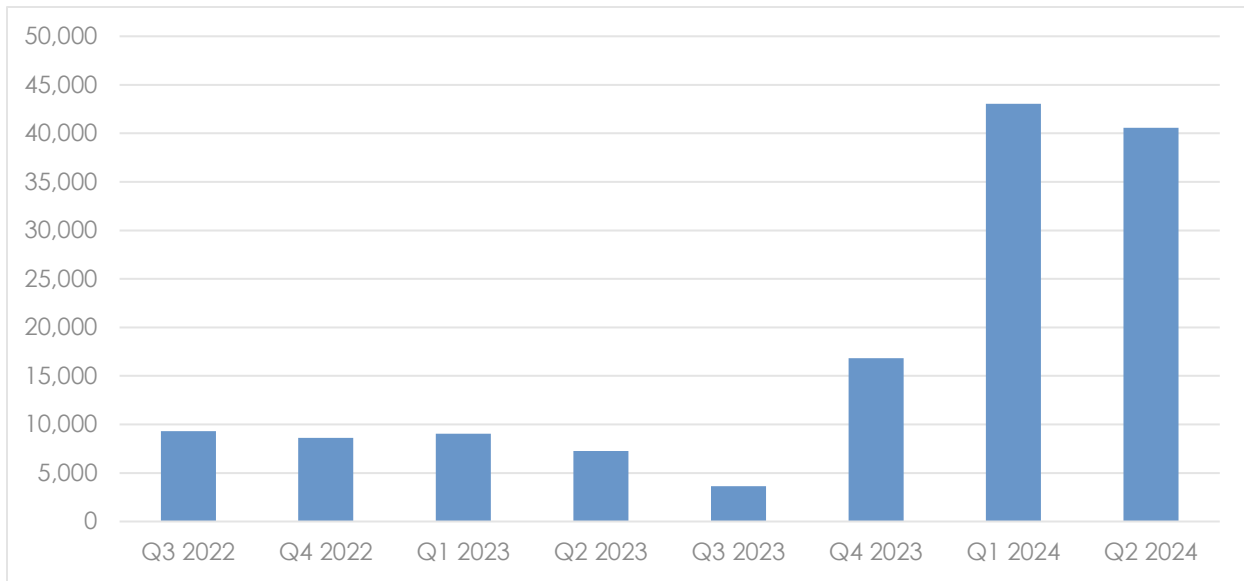
It took the LAFAs several quarters to scale up contracts with Access Providers before they were able to provide a significant volume of rides, and issues with data reporting, such as inconsistently formatted reports, the inclusion of ineligible trips in overall trip counts, and the possible exclusion of eligible trips in overall trip counts may be undercounting the true size of the program. LAFAs and Access Providers believe there is room for their programs to grow, but that the current level of funding is insufficient on its own to provide the services their communities need. CPUC staff is working with LAFAs to address reporting issues.

Figure 22: Trips Requested and Completed by Access Providers



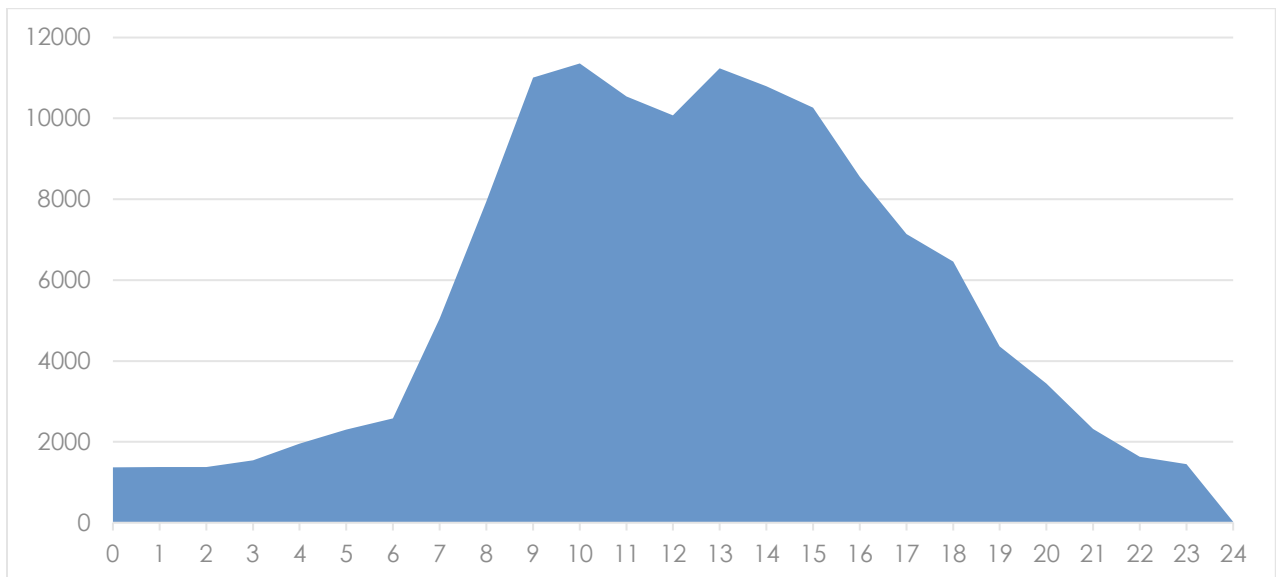
As seen in the previous chart, LAFAs WAV services have significantly expanded over the last several quarters. Most of the growth has been seen between the fourth quarter of 2023 and the first quarter of 2024. In addition to this, data reporting requirements have recently changed; this may impact the accuracy of data reporting.

Figure 23: WAV Hours provided by LAFAs by Quarter



Like the services provided by TNCs, LAFA service is primarily available during standard workday hours. WAV services provided by LAFAs peak at 10 AM and 1 PM, with LAFAs providing 69% of WAV hours between 9 AM and 4 PM. 18% of WAV hours provided were after 5 PM and 13% before 9 AM. Note that this chart is highly influenced by the service patterns in Los Angeles, where most WAV hours are provided.

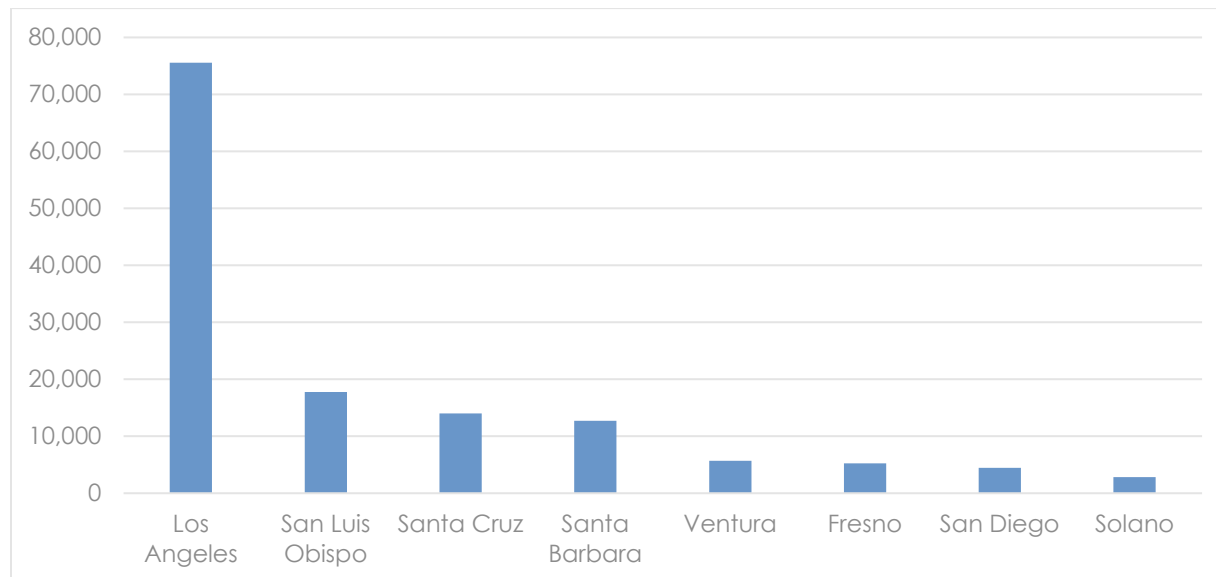
Figure 24: WAV Hours provided by LAFAs by Hour of Day



55% of WAV hours were provided by Butterfli Technologies and Administrative Services Cooperative, Access Providers contracted by Los Angeles Metro. This is likely in large part thanks to

the significantly higher funding levels available in Los Angeles compared to other counties. In addition to this, data reporting requirements have recently changed; this may impact the accuracy of data reporting.

Figure 25: WAV Hours Provided by LAFAs by County¹⁹



Over the course of the four funding Cycles, LAFAs received \$30,307,969.27 in AFA funding, with LA Metro being the largest recipient of funding, with \$12,982,896 into total funding received, 43% of the total funding distributed to LAFAs. SFMTA and SANDAG represent 27% and 22% of the total funding distributed to LAFAs, with \$8,090,322.00 and \$6,678,675.09 in funding received respectively. The other ten LAFAs that received funding totaled the remaining 8%.

Over the last year (Q3 2023 to Q2 2024), LAFAs received \$7,070,978. SFMTA received 57% or \$4,045,161 of that funding, while LA Metro received 26% or \$1,864,487. SANDAG received 13% or \$952,043, with the other seven LAFAs receiving the remaining 4%. During this time period, LA Metro awarded funds to pay for the operations of their Access Providers, Butterfli and ASC. SFMTA did not award funds in the same time period due to the lack of a dedicated staff member to administer the AFA program. SANDAG awarded funds to their Access Provider, FACT.

For the present fiscal year (Q3 2024 to Q2 2025), LAFAs received \$12,400,785. LA Metro received 54% or \$6,671,609 of that funding, while SANDAG received 22% or \$2,731,158. SFMTA received 14% or \$1,713,063, with the other nine LAFAs receiving the remaining 10%.

¹⁹ This chart does not include all LAFAs in the program, as not all LAFAs have Access Providers that have provided service.

Statewide Access Fund Administrators

For geographic areas where no LAFA is selected, Decision [D.20-03-007](#) authorizes CPUC Staff to retain an independent entity to act as the Statewide Access Fund Administrator (SAFA), which can be a private or non-profit entity or other state agency, in hopes to expand on-demand WAV service throughout the remaining geographic areas of California. CPED posted a second Request for Proposals on October 11, 2024.²⁰ CPED posted an [Intent to Award](#) to GCAP on January 13, 2025. No protest was received.

Statewide Access Fund Administrator Funding

The amount of Access Funds available to the SAFA and the Access Providers depends on the following:

- Total amount of Access Fees collected from each geographic area;
- TNCs' own investments in on-demand WAV expansion by geographic area; and
- Access Fund Administrator's participation at the local level.

Table 17 below shows the remaining balance through June 2023. The remaining balance reflects fees collected through June 2023, offsets and exemptions approved from Q3 2019 through Q2 2023, funds awarded to the LAFAs, and estimated audit contract expense. The remaining balance of \$22.8M has been allocated to the SAFA to expand on-demand WAV throughout the remaining geographic areas of California.

Table 17: Remaining Access Funding Balance Through June 2023

Access fees collected through June 2023	\$87.4M
Less: Approved offsets/exemptions through June 2023	\$28.1M
Less: Cycle 1 LAFAs FY 2019-2020	\$10.6M
Less: Cycle 2 LAFAs FY 2020-2021	\$5.6M
Less: Cycle 3 LAFAs FY 2021-2022	\$7.1M
Less: Cycle 4 LAFAs FY 2022-2023	\$12.4M
Less: Audit expense	\$800,000
Remaining Balance through June 2023	\$22.8M

²⁰ <https://caleprocure.ca.gov/event/8660/0000033076>

Table 18 below further breaks down the remaining balance of \$22.8M by County. The 12 LAFAs that were approved for Cycle Four have been removed to reflect the most up to date balance.

Table 18: 2024-2025 Projected Access For All Funding Availability

County	LAFAs Approved	Estimated Available Funds	County	LAFAs Approved	Estimated Available Funds
Alameda	No	\$2,825,014	Orange	No	\$5,537,802
Alpine	No	\$0	Placer	No	\$269,453
Amador	No	\$227	Plumas	No	\$505
Butte	No	\$125,274	Riverside	No	\$1,657,938
Calaveras	No	\$51	Sacramento	No	\$2,359,640
Colusa	No	\$297	San Benito	No	\$2,958
Contra Costa	Yes	\$434,226	San Bernadino	No	\$1,758,499
Del Norte	No	\$30	San Diego	Yes	\$2,731,158
El Dorado	No	\$77,540	San Francisco	Yes	\$1,713,063
Fresno	Yes	\$191,651	San Joaquin	No	\$328,571
Glenn	No	\$226	San Luis Obispo	Yes	\$68,497
Humboldt	No	\$17,769	San Mateo	No	\$2,150,419
Imperial	No	\$21,768	Santa Barbara	Yes	\$155,823
Inyo	No	\$13	Santa Clara	No	\$3,663,138
Kern	No	\$523,931	Santa Cruz	Yes	\$54,422
Kings	No	\$7,084	Shasta	No	\$59,645
Lake	No	\$123	Sierra	No	\$0
Lassen	No	\$16	Siskiyou	No	\$27
Los Angeles	Yes	\$6,671,609	Solano	Yes	\$94,210
Madera	No	\$5,987	Sonoma	No	\$373,222
Marin	No	\$274,800	Stanislaus	No	\$173,730
Mariposa	No	\$167	Sutter	No	\$16,449
Mendocino	No	\$764	Tehama	No	\$1,021
Merced	No	\$42,502	Trinity	No	\$0
Modoc	No	\$0	Tulare	No	\$71,037
Mono	No	\$401	Tuolumne	No	\$663
Monterey	Yes	\$82,658	Ventura	Yes	\$143,823
Napa	No	\$200,898	Yolo	No	\$265,459
Nevada	No	\$8,409	Yuba	No	\$11,021
Statewide Total		\$35,175,628 - \$12,400,785 (LAFAs Approved) = \$22,773,843*			

* Sacramento's funding balance of \$2.4M will be allocated to a LAFAs in Sacramento for Cycle 5 and therefore has been excluded in the SAFA RFP contract amount.

Community Wheelchair Accessible Vehicle Demand

In D.21-11-004, the CPUC defined community WAV demand as “the number of people who may be eligible to use and benefit from a transportation program relating to accessibility for persons with disabilities, including wheelchair users who need a WAV.” Below we provide insight regarding the number of people with disabilities across California, additional information about those with ambulatory difficulty, and insightful trends from counties served by the Access for All Program.

One key source of information is the United States Census Bureau’s disability database, which consists of sets of data from the American Community Survey (ACS), the Survey of Income and Program Participation (SIPP), and the Current Population Survey (CPS).²¹ These three surveys contain information about six disability types: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. Respondents in the survey who report any of the six disability types are considered to have a disability. To learn more about the disability communities in California, this report considered the 2023 ACS 5-year estimate data for those with ambulatory difficulty as people with this disability type could benefit the most from WAVs.

The Census Bureau’s 2023 American Community Survey’s 5-year estimates estimated that 11.3%, or about 4.4 million Californians, have disabilities as summarized in Table 19 below. Of these, about 2.1 million Californians have ambulatory difficulty, representing almost 6% of the state’s total population. Appendix E further breaks down the data for those with ambulatory disability by age group. A majority of California’s population with ambulatory difficulty (about 59%) are over the age of 65, while 39% are between the ages of 18 to 64. 2% are under the age of 18. These insights suggest that potential WAV service customers could be from all age groups.

²¹ U.S. Census Bureau, “How Disability Data are Collected from The American Community Survey,” www.census.gov/topics/health/disability/guidance/data-collection-ac.html.

Table 19: California's Population with Disability by Type

Disability Type	Population with Disability	% Share of Total CA Population
Hearing Difficulty	1,155,765	3%
Vision Difficulty	825,795	2%
Cognitive Difficulty	1,733,010	5%
Ambulatory Difficulty	2,137,316	6%
Self-care Difficulty	996,279	3%
Independent Living Difficulty	1,734,690	6%

Table 20: Breakdown of Population with Ambulatory Difficulty by Age Group

Age Group	Population with Ambulatory Issues	Percentage Share
Under 18	42,696	2%
18 to 64	815,010	38%
Over 65	1,313,487	60%
All	2,171,193	100%

The ACS data for those with ambulatory difficulty in California can also be broken down by county. Figure 26 below shows the distribution of percentage as a share of total population with ambulatory difficulty for each of California's 58 counties. The largest population with ambulatory issues is in Los Angeles, which consists of a quarter (26%) of the total population with ambulatory issues in California, followed by San Diego with 7% and Riverside with 7%. The remaining nine of the top 10 counties—Orange, San Bernardino, Sacramento, Santa Clara, Alameda, Fresno, and Contra Costa—represent 44% of the state's total population with ambulatory difficulty.

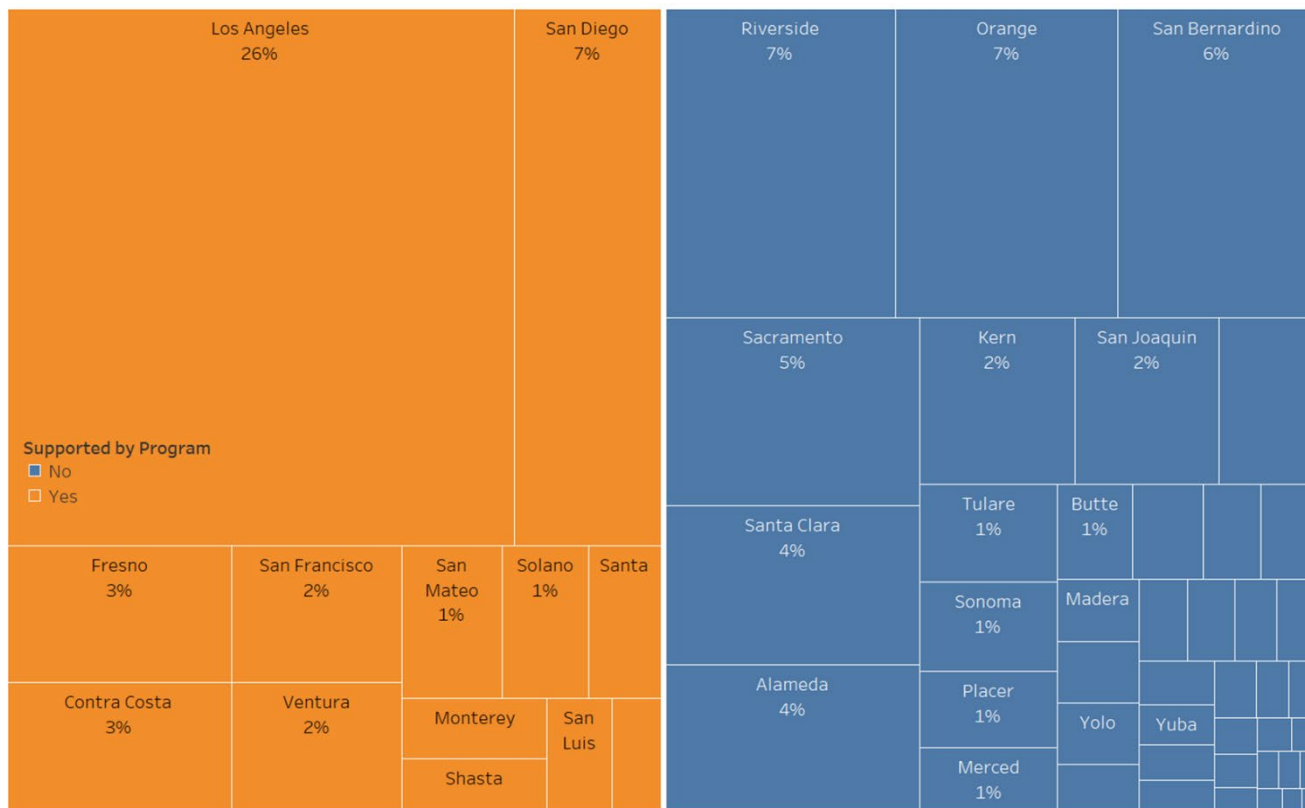
When examining the counties by the percentage of the county's total population with ambulatory difficulties, there are seven counties where 10% or more of the population lives with ambulatory difficulties. In descending order of the percentage of the population with ambulatory difficulties, those counties are Sierra County, Plumas County, Del Norte County, Modoc County, Calaveras County, Lake County, and Trinity County. These counties represent 184,559 Californians, 20,415 of whom live with ambulatory difficulties. These counties are expected to have under \$350 in total available in AFA funds in the coming funding cycle—a prime example of the value of allowing counties to pool funds.

For a complete list of all counties with corresponding ACS data, please refer to Appendix E.

Further analysis of the ACS disability dataset is needed to fully understand the population with disability, especially at a localized level. One suggestion is to dissect the data into racial and gender groups, and other socioeconomic variables such as income, poverty, and education levels. It is also beneficial to investigate the linguistic barriers within the disability communities so that effective outreach and marketing can be adjusted if needed. In addition to this information, assessing

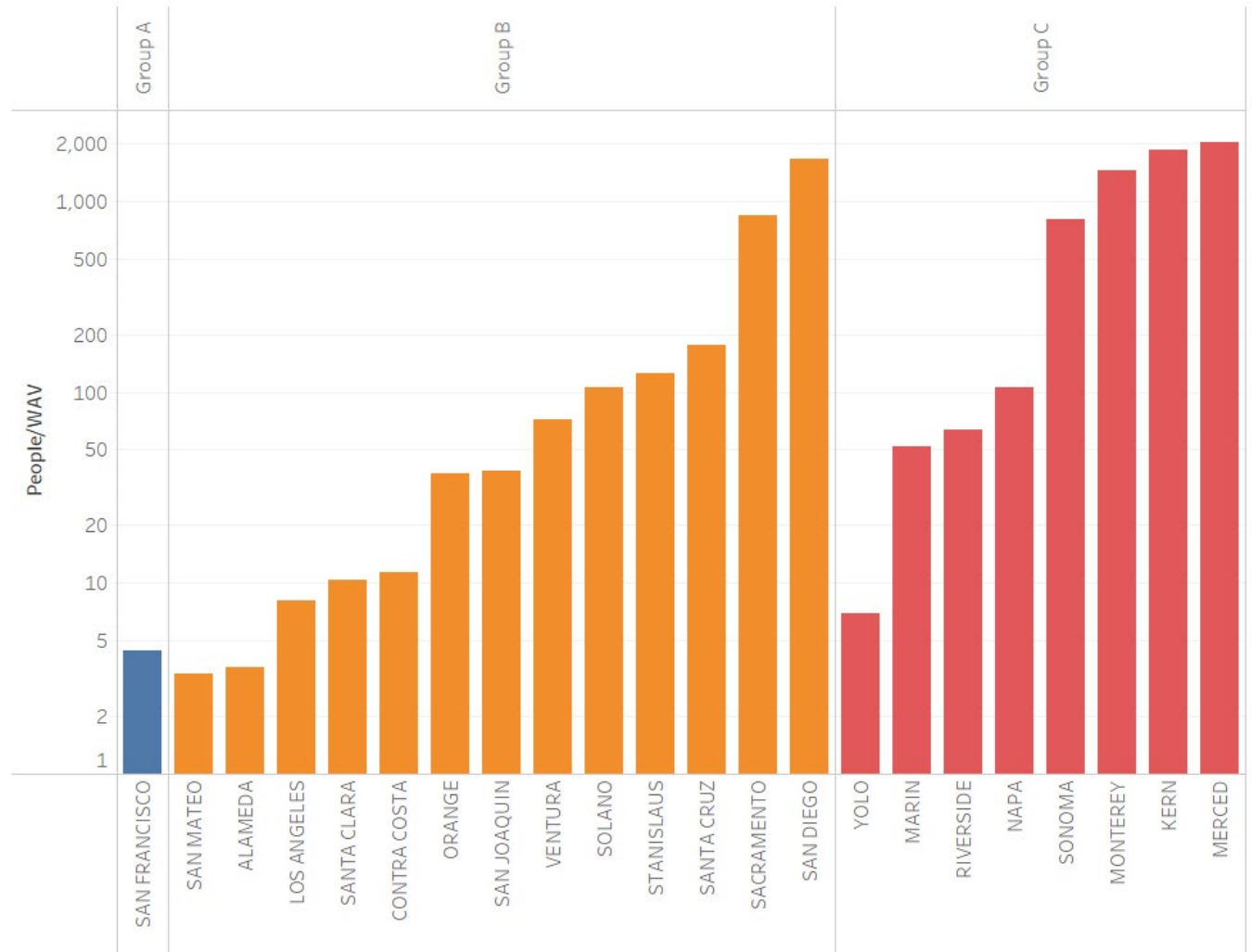
community WAV demand will require key variables including population, availability, and price of substitutes for on-demand WAV service, and customer’s taste and preferences. It is also worth noting that not all people with ambulatory difficulties use a wheelchair, making the current method of analysis limited.

Figure 26: Percentage of California Population with Ambulatory Difficulty, by County



Examining the general level of service per person with ambulatory difficulty in each county where TNC service has been offered reveals that service is not evenly distributed within county groups. Figure 27 shows the number of people with ambulatory difficulties per WAV service hour. The data was presented on a logarithmic scale to reflect significant variation between the smallest and largest values. Lower ratios indicate that WAV service is proportionally more available. Observing the data, it reveals three rough groups: 0-20, 20-200, and 200 and above. High performing counties in the 0-20 range, like San Francisco, where there are four people per WAV hour, include a significant number of Group B counties, like Los Angeles and Contra Costa, and Yolo, a Group C County. The 20-200 range includes the largest group of Group B counties, and a significant fraction of the Group C counties, with the 200 and above group being dominated by Group C counties, with some Group B counties. Service is not evenly distributed through county groups, and there are opportunities for improvement in WAV supply per person in certain counties.

Figure 27: Number of People with Ambulatory Difficulty in County per Average Quarterly WAV Hours



Appendices

Appendix A – Offset Requirements

Criteria	Must Demonstrate
1. Presence and availability of WAVs	(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 (effective Q2 2023); 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 (effective Q2 2023); and (e) operating hours for each geographic area
2. Improved level of service	Both the Offset Time and the Trip Completion Standards are satisfied: (a) (1) Offset Time Standard & 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. (b.1) Trip Completion Standard: Meet or exceed the applicable minimum percentage of trip requests completed, and (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.
3. Efforts to publicize and promote available WAV services	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
4. Full accounting of funds expended	Qualifying offset expenses are: (a) reasonable, legitimate costs that improve a TNC’s WAV service, and (b) incurred in the quarter for which a TNC requests an offset, and (c) on the list of eligible expenses attached as Appendix A in D.20-03-007 (d) net of fare revenues collected from WAV service delivery in the quarter for which a TNC requests an offset.
5. Training and inspections	(a) certification of WAV driver training completion within the past 3 years, (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

Criteria	Must Demonstrate
6. Reporting complaints	(a) number of complaints related to WAV drivers or services –by quarter and geographic area, and broken out by category

Appendix B – Eligible Wheelchair Accessible Vehicle Expenses

APPENDIX A	
Eligible WAV Expenses	
Vehicle Costs	
Lease/Rental/Purchase Costs	
Rental Subsidies for Driver	
Inspections	
Maintenance, Service & Warranty	
Fuel Cost	
Cleaning Supplies/Services	
Other (Describe)	
Partnership Costs	
Transportation Service Partner Fees/Incentives and/or Management Fees	
Vehicle Subsidies	
Consultants/Legal	
Other (Describe)	
Marketplace Costs	
Recruiting	
Driver Onboarding	
Training Costs	
Driver Incentives	
Promo Codes for WAV	
Other (Describe)	
Operational Costs	
Marketing Costs	
Technology Investments/Engineering Costs/Enhancements	
Community Partnership/Engagement Costs	
Rental Management	
Pilot Management	
Wages, Salaries and Benefits (non-maintenance personnel)	
Other (Describe)	
Other (Describe)	
Total	

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing has been examined by me and is true, correct and complete to the best of my knowledge and belief.

Signature _____
 Preparer _____
 Address _____

Title _____
 Date _____
 Phone _____
 Email _____

Appendix C – Quarterly Exemption Response Times by TNC and County

Table 21: Quarterly Exemption Response Times by TNC and County (Level 2 Benchmark Standard: Q2 2022 - Present)

TNC	County	Response Time Benchmark (Level 2)	Level 2 Benchmark Standard								
			Q2 2022	Q3 2022	Q4 2022	Q1 2023	Q2 2023	Q3 2023	Q4 2023	Q1 2024	Q2 2024
LYFT	LOS ANGELES	20	32	32	33	30	29	26	29	29	27
	SAN FRANCISCO	16	18	17	17	18	18	16	15	15	14
UBER	SAN FRANCISCO	16		21			18	20	16	16	13
	SAN MATEO	20	25		20		21	25	25	21	
	LOS ANGELES	20					27	28	26	25	24
	ALAMEDA	20	23								
	SOLANO	30			20						

Appendix D – Entities Conditionally Selected as Local Access Fund Administrators

Entity Name	Entity Type	Geographic Areas Covered
Association of Monterey Bay Area Governments (AMBAG)	MPO	Monterey, San Benito, Santa Cruz
Butte County Association of Governments (BCAG)	MPO, RTPA	Butte
Fresno Council of Governments (FresnoCOG)	MPO, RTPA	Fresno
Kern Council of Governments (KCOG)	MPO, RTPA	Kern
Kings County Association of Governments (KCOG)	MPO, RTPA	Kings
Madera County Transportation Commission (Madera CTC)	MPO, RTPA	Madera
Merced County Association of Governments (MCAG)	MPO, RTPA	Merced
Metropolitan Transportation Commission (MTC)	MPO, RTPA	Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, Sonoma
Sacramento Area Council of Governments (SACOG)	MPO, RTPA	El Dorado, Placer, Sacramento, Sutter, Yolo, Yuba
San Diego Association of Governments (SANDAG)	MPO, RTPA	San Diego
San Joaquin Council of Governments (SJCOCG)	MPO, RTPA	San Joaquin
San Luis Obispo Council of Governments (SLOCOG)	MPO, RTPA	San Luis Obispo
Santa Barbara County Association of Governments (SBCAG)	MPO, RTPA	Santa Barbara
Shasta County Regional Transportation Planning Agency (SCRTPA)	MPO, RTPA	Shasta
Southern California Association of Governments (SCAG)	MPO, RTPA	Imperial, Los Angeles, Orange, Riverside, San Bernardino, Ventura
Stanislaus Council of Governments (StanCOG)	MPO, RTPA	Stanislaus
Tahoe Regional Planning Agency (TRPA)	MPO, RTPA	Parts of El Dorado and Placer
Tulare County Association of Governments (TCAG)	MPO, RTPA	Tulare
Calaveras County COG	RTPA	Calaveras
Humboldt County Association of Governments	RTPA	Humboldt
Lake County Area Planning Council	RTPA	Lake
Mendocino COG	RTPA	Mendocino
Tuolumne County Transportation Council	RTPA	Tuolumne
Del Norte Local Transportation Commission (LTC)	RTPA	Del Norte

Entity Name	Entity Type	Geographic Areas Covered
Modoc CTC	RTPA	Modoc
Siskiyou County LTC	RTPA	Siskiyou
Tehama County LTC	RTPA	Tehama
Trinity County LTC	RTPA	Trinity
Nevada CTC	RTPA	Nevada
Inyo County LTC	RTPA	Inyo
Mono LTC	RTPA	Mono
Alpine LTC	RTPA	Alpine
Amador CTC	RTPA	Amador
Mariposa LTC	RTPA	Mariposa
Sierra LTC	RTPA	Sierra
Plumas CTC	RTPA	Plumas
Colusa CTC	RTPA	Colusa
Lassen CTC	RTPA	Lassen
Glenn CTC	RTPA	Glenn

Appendix E – California's Population with Ambulatory Difficulties by County

Data sourced from the Census Bureau's 2023 American Community Survey 5-year estimates.

County	Total Population with Ambulatory Difficulties	Percentage of California's Total Population with Ambulatory Difficulties	Total Population	Percentage of County's Total Population with Ambulatory Difficulties
Alameda	77,510	4%	1,641,321	5%
Alpine	124	<1%	1,695	7%
Amador	3,227	<1%	37,789	9%
Butte	14,540	<1%	207,385	7%
Calaveras	5,159	<1%	45,670	11%
Colusa	1,312	<1%	21,675	6%
Contra Costa	59,876	3%	1,156,624	5%
Del Norte	2,962	<1%	25,053	12%
El Dorado	10,273	<1%	191,284	5%
Fresno	62,685	3%	1,000,249	6%
Glenn	1,741	<1%	28,407	6%
Humboldt	10,907	<1%	134,502	8%
Imperial	13,575	<1%	171,830	8%
Inyo	1,350	<1%	18,442	7%
Kern	52,402	2%	888,229	6%
Kings	8,196	<1%	135,709	6%
Lake	7,031	<1%	67,517	10%
Lassen	2,309	<1%	24,167	10%
Los Angeles	553,483	26%	9,778,622	6%
Madera	10,413	<1%	152,205	7%
Marin	11,031	<1%	255,482	4%
Mariposa	1,585	<1%	16,906	9%
Mendocino	8,247	<1%	89,961	9%
Merced	18,601	<1%	283,066	7%
Modoc	977	<1%	8,481	12%
Mono	373	<1%	13,011	3%
Monterey	17,808	<1%	420,702	4%
Napa	7,829	<1%	134,594	6%
Nevada	6,565	<1%	101,534	6%
Orange	139,703	6%	3,148,716	4%
Placer	21,233	<1%	409,369	5%

County	Total Population with Ambulatory Difficulties	Percentage of California's Total Population with Ambulatory Difficulties	Total Population	Percentage of County's Total Population with Ambulatory Difficulties
Plumas	2,337	<1%	19,459	12%
Riverside	144,434	7%	2,426,978	6%
Sacramento	97,405	5%	1,570,424	6%
San Benito	3,274	<1%	65,903	5%
San Bernardino	125,142	6%	2,149,192	6%
San Diego	159,689	7%	3,171,172	5%
San Francisco	47,452	2%	832,209	6%
San Joaquin	48,844	2%	778,075	6%
San Luis Obispo	15,189	<1%	276,628	5%
San Mateo	31,168	1%	741,370	4%
Santa Barbara	22,504	1%	436,460	5%
Santa Clara	82,154	4%	1,893,216	4%
Santa Cruz	11,559	<1%	264,998	4%
Shasta	16,383	<1%	179,911	9%
Sierra	318	<1%	2,633	12%
Siskiyou	3,613	<1%	43,621	8%
Solano	26,769	1%	438,884	6%
Sonoma	24,865	1%	482,063	5%
Stanislaus	33,227	2%	549,358	6%
Sutter	6,842	<1%	97,599	7%
Tehama	5,365	<1%	65,061	8%
Trinity	1,631	<1%	15,746	10%
Tulare	27,170	1%	471,506	6%
Tuolumne	4,865	<1%	52,361	9%
Ventura	45,671	2%	830,360	6%
Yolo	10,241	<1%	216,081	5%
Yuba	6,178	<1%	80,273	8%
California Overall	2,137,316	100%	38,761,738	6%