

SENATE BILL 1376

Transportation Network Company Access for All Program

REPORT TO THE LEGISLATURE

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This report presents analysis of the Program's performance for the 16-quarter period from the 3rd quarter of 2019 (Q3 2019) through the 2nd quarter of 2023 (Q2 2023).



**California Public
Utilities Commission**

SENATE BILL 1376
Report to the Legislature
on the Transportation Network Company
Access for All Program

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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 into providing WAV service.

This report provides a review of the Program and provides the following in accordance with P.U. Code § 5440.5(2)(A), which directed the CPUC to submit a report to include but not limited to all of the following:

- (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 2023 (Q2 2023). This reporting period includes three quarters during which travel was impacted by COVID-related shelter-in-place orders.

CPUC’s Consumer Protection and Enforcement Division (CPED) staff assessed whether WAV service is within service benchmarks established by the CPUC, which covers various features of service, including presence of WAVs across hours of the day, decrease in WAV-related expenditures, promotion of WAV service through outreach and engagement, and occurrence of complaints from WAV customers. The findings show that TNCs have an ability to meet and exceed Program goals in most key performance areas in some counties, but there is still room for improvement and more to be learned about statewide feasibility of offering 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.

Response Times and Trip Completion Rates

- TNC WAV service can meet the required response times in several counties.** However, reported WAV response times vary significantly by county and reports lack comprehensive data on counties where standards were not met or where TNCs were considered but did not offer WAV service due to the infeasibility of meeting the response times.
- Completed WAV trip volume in the Program is stable and recovering after the COVID pandemic's impacts, and the trip completion rate is increasing over time.** The highest completion rate across all TNCs in the Program was registered in Q3 2022 at over 70 percent. Although there was a significant decline in the total number of completed trips during Q2 2021 due to the pandemic, by Q4 2021 completed trips were back at the same level as Q1 2021.
- A higher percentage of WAV trips are being completed than at the beginning of the Program.** The percentages of trips that were completed within the specific response time benchmarks have remained above 60 percent in most counties, while the percentages are higher in some counties, ranging between 80 and 100 percent.
- Wait times for WAV passengers in the Program are longer than for non-WAV passengers outside of the Program.** 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 regular business hours of 8 AM to 5 PM and lowest between 12 AM to 3 AM. Though the hourly distribution of trips requested matches that of WAV availability, both supply and demand vary significantly by county.
- The percentage of trips that are completed has increased while the percentage of trip requests not accepted has 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 76% in 2022. In contrast, the share of unaccepted trips has declined significantly from a high of 63% in Q3 2019 to 5% in Q3 2022.

Funds Expended Relative to WAV Service Provided

- Reimbursable WAV-related expenditures have decreased.** TNCs' reimbursable WAV-related expenditures have decreased over the Program's lifespan. To date, TNCs have expended about \$43 million, requested \$32 million in reimbursements, and have been awarded \$28 million. Though funds expended have decreased, per-trip cost remains high. However, the reduction in overall expenditures and increasing volume of ridership could lead to further efficiencies.

- **Cost to TNCs to provide trips remains high, but the decreasing overall expenditures and increasing ridership could lead to further efficiencies.** Per-trip costs average \$456 for Lyft and \$293 for Uber over the Program’s lifespan. This significant gap could be related to the variation in WAV service coverage across TNCs and fundamental differences in how each TNC provides WAV service.

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 employed also included in-person engagement at events, in-app notifications, interviews, presentations, speaking engagements and sponsorships. More robust data are needed to further assess the effectiveness of TNCs’ outreach efforts. Additional outreach standards have been set effective Q3 2023.

Complaints Logged by WAV Customers

- **Overall WAV customer complaints have remained low relative to total volumes of trips requested and completed.** A total of 997 complaints (representing about 1% of trips) were received by the TNCs from their WAV customers between Q3 2019 to Q2 2023. 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.

Program Recommendations to the Legislature

- **Implement a competitive biennial process:** Provide Local Access Fund Administrators the flexibility to solicit Access Providers at least as often as every two years. This flexibility could reduce barriers for the Local Access Fund Administrators and Access Providers.
- **Ensure WAV service requirements are not limited to one technology.** Ensure that autonomous vehicle passenger service providers participate in the Access for All Program. New and emerging on-demand transportation services, such as autonomous vehicle passenger services could disrupt the market for on-demand transportation services. As the market for transportation services evolves it is important to ensure that access requirements evolve too.
- **Reauthorize SB1376:** Maintain the Legislature’s goals for the Program while including the modifications described above to further strengthen the Program.

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 deposited into the CPUC’s TNC Access for All Fund (Access Fund) for distribution to

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.

“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.

Any remaining monies (i.e., those not claimed by TNCs in the offset process) 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 LAFA.¹⁰ Consequently, the CPUC delegated Access Fund Administrators the role of distributing funds to Access Providers in each county.

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](#).

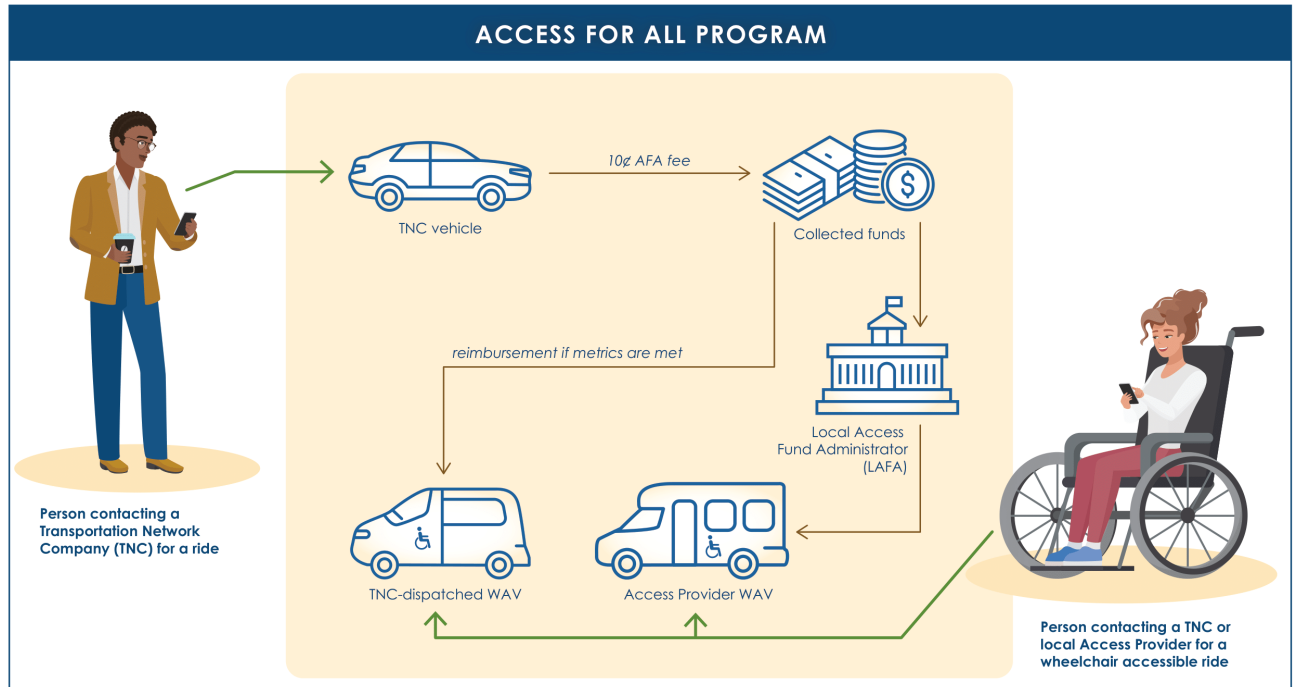
⁷ See [D.20-03-007](#) OP19.

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.

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

Figure 1: Access for All Program Overview Diagram



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).

Over the 16-quarter period (Q3 2019-Q2 2023), the offset requirements have changed. 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

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

is defined as “a 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	<u>Presence and availability of WAVs</u> 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	<u>Presence and availability of WAVs</u> 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	<u>Improved Level of Service</u> 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	<u>Improved Level of Service</u> 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). The benchmarks shall advance each quarter, regardless of whether			✓	✓

Decision	Offset Requirements	Q3 2019 - Q1 2021	Q2 2021- Q1 2022	Q2 2022- Q1 2023	Q2 2023- onward
	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

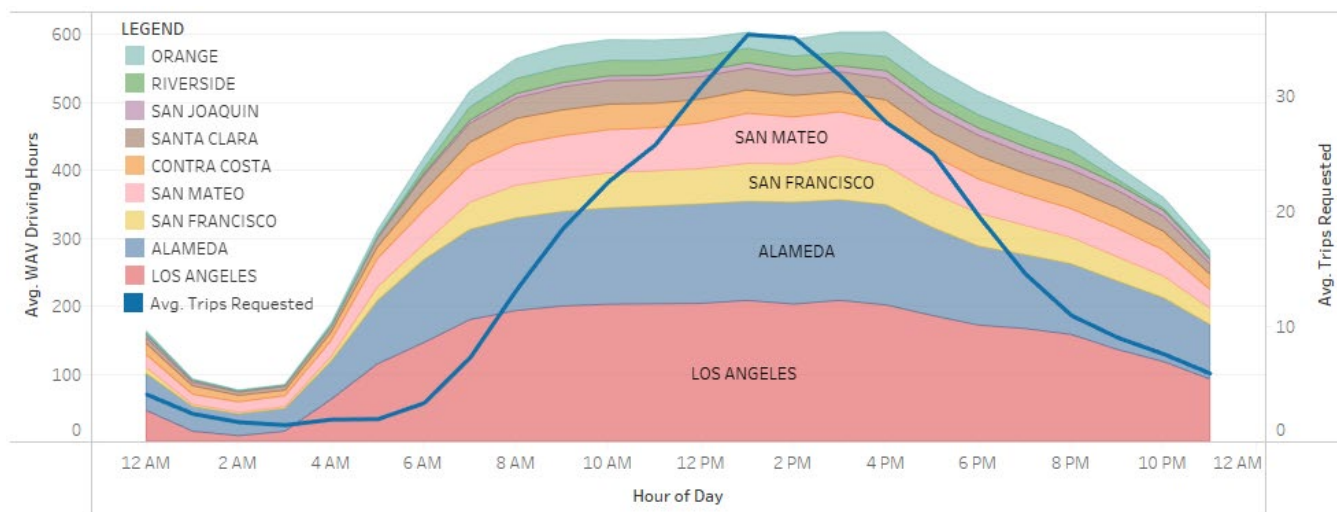
- 2) The number and percentage of WAV trips completed, not accepted, cancelled by passenger, cancelled due to passenger no-show, and cancelled by driver – by quarter and aggregated by hour of the day and day of the week.

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 spike 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. Please note, the TNCs are currently only required to report data for counties in which they are requesting an offset, so the actual TNC-provided WAV service may vary more than what is represented (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.

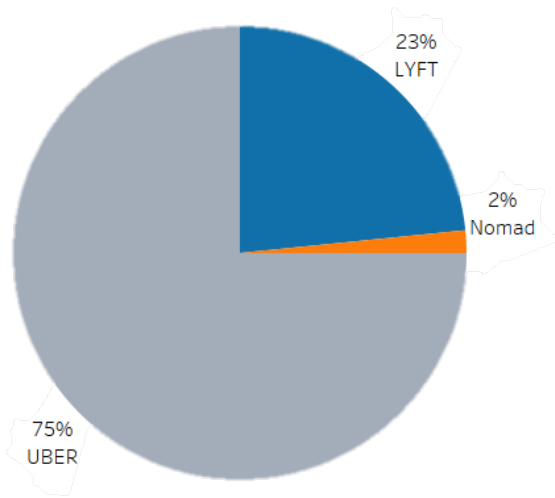
Figure 2: Average WAV driving hours across times of day since Q3 2019



Wheelchair Accessible Vehicles Trip Requests

There were 317,842 WAV trips requested from Q3 2019 to Q2 2023. As shown in Figure 3 below, 75% of those trips were requested through Uber, 23% through Lyft, and 2% through Nomad. Note, Nomad discontinued participation in the Program in Q1 2021.

Figure 3: Breakdown of WAV Trips Requested by TNC (Q3 2019 - Q2 2023)



Although there has been an overall downward trend in WAV trips requested since the start of the Program and the COVID-19 pandemic, Q2 2023 shows an increase in total WAV trips requested that mirror pre-pandemic numbers.

Figure 4: Total WAV Trips Requested by Quarter

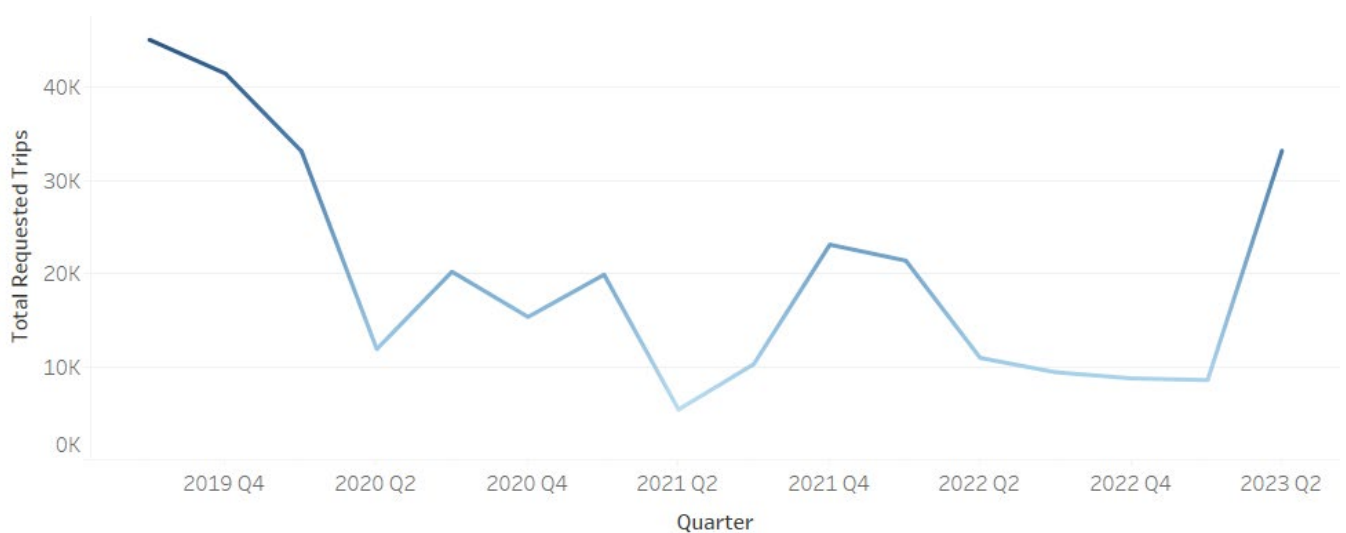
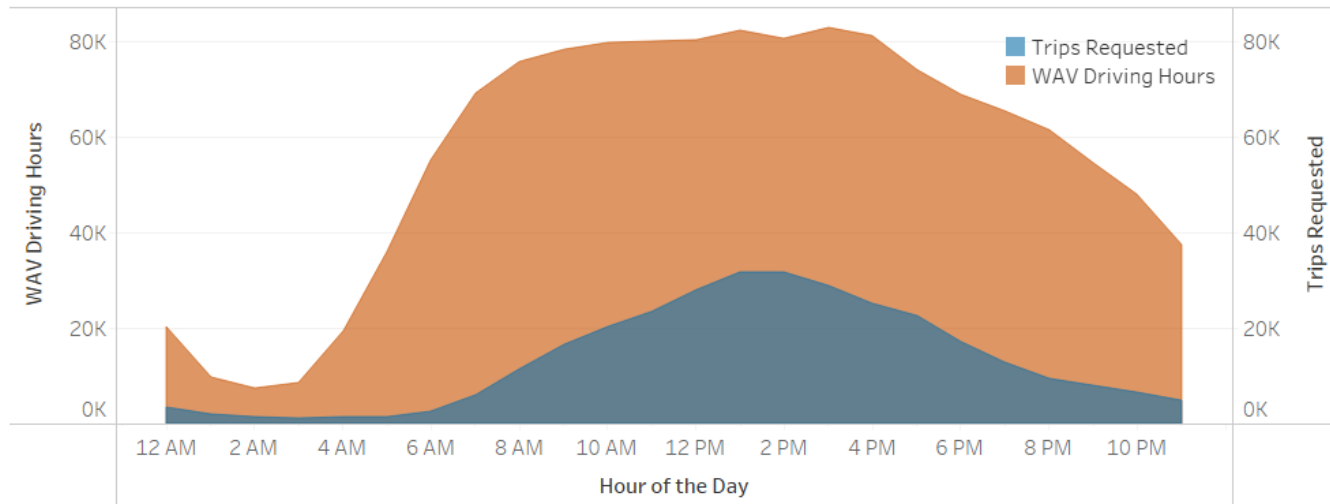


Figure 5 shows the hourly distribution of all WAV trips requested from Q3 2019 to Q2 2023, which peaks at similar hours as the WAV availability. WAV trip requests are concentrated between the hours of 8 AM to 5 PM and wane starting midnight to early morning.

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 2019 - Q2 2023)

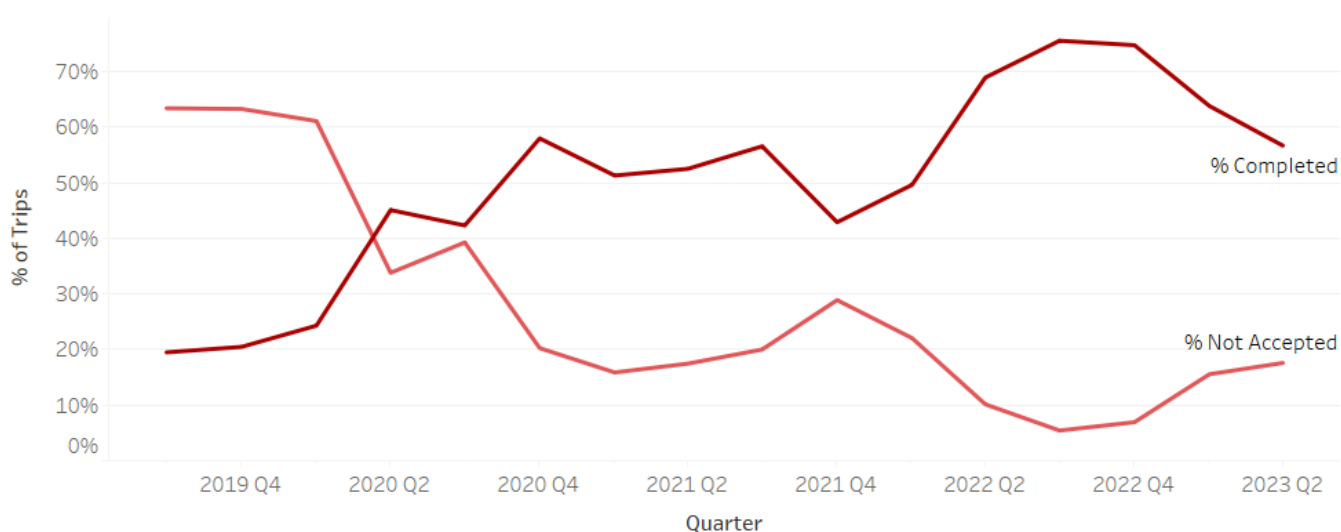
TNC	Completed	Not Accepted	Canceled by Driver	Canceled by Passenger	Total Requested Trips
Lyft	48,132	9,537	1,975	16,198	74,380
Nomad	4,308	494	49	189	5,084
Uber	80,402	106,969	2,955	48,052	238,378
Grand Total	132,842	117,000	4,979	64,439	317,842

Trips Completed and Not-Accepted

In 2022, 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.

Figure 6: Completed trips compared to not accepted trips

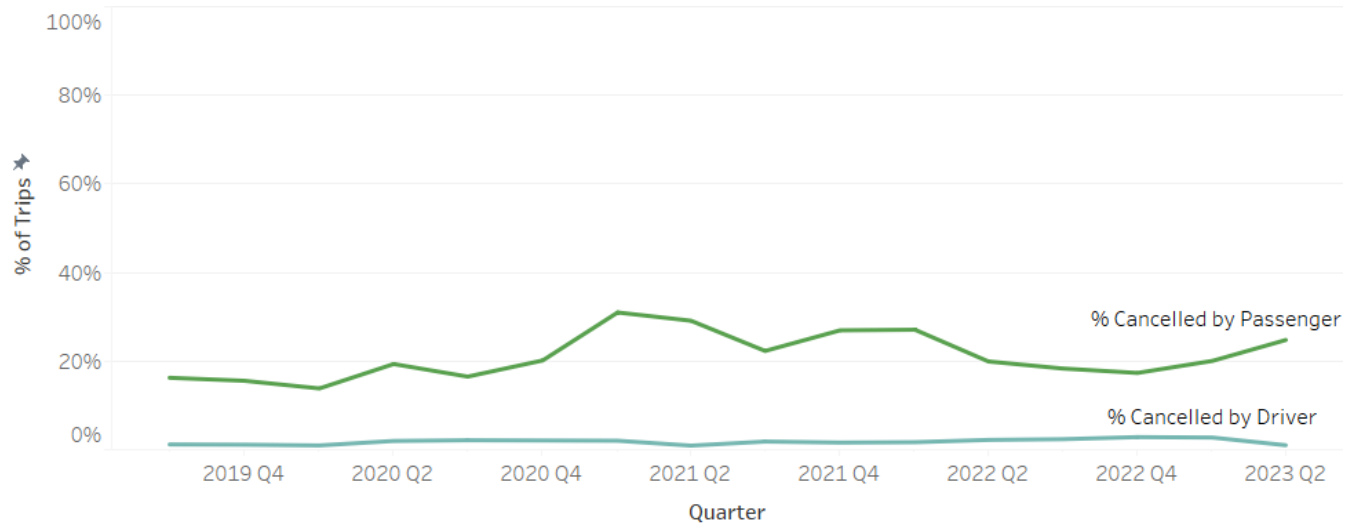


Trips Cancelled by Passengers and Drivers

Trip Cancellations Have 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 around 20%.

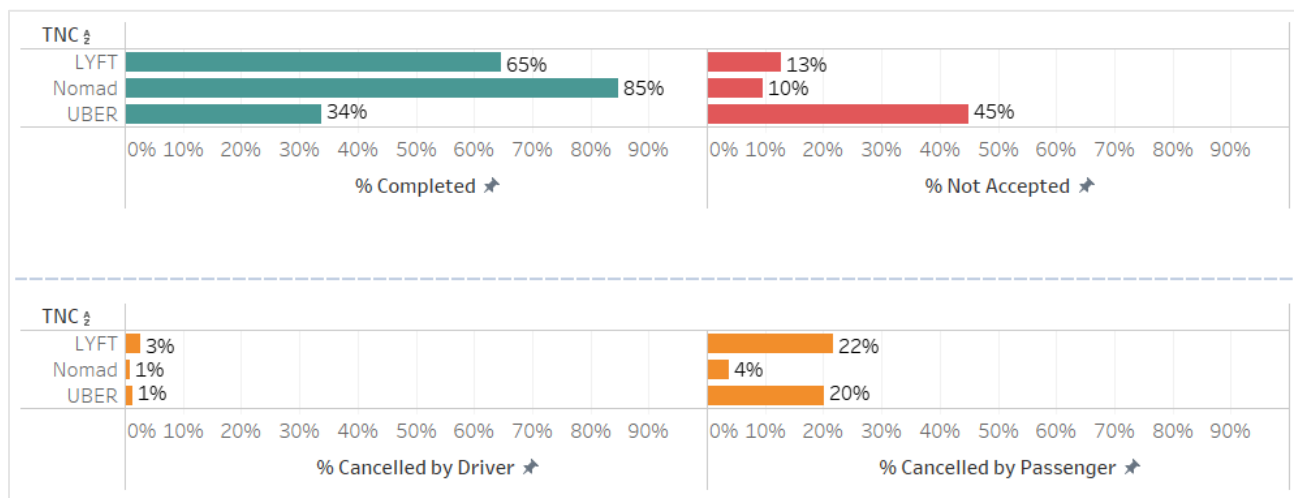
Figure 7: Cancelled WAV Trips as a Percentage of All Requested Trips



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 2023 data, Uber’s percentage of completed trips increased from 29% to 34% and their percentage of not accepted trips decreased from 51% to 45%. Lyft’s percentages remained relatively consistent across the time period. Passenger initiated cancellations remain the main cause of trip cancellations.

Figure 8: Overview of Trip Outcomes by TNC (Q3 2019 - Q2 2023)



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 2023 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.

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.

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

TNC County		Response Time (minutes)																		
		Level 1 Benchmark	Track 2 Decision Standard (Level 1 – 50 th percentile)											Track 4 Decision Standard (Level 1 – Shifting Scale)						
			Q3 2019	Q4 2019	Q1 2020	Q2 2020	Q3 2020	Q4 2020	Q1 2021	Q2 2021	Q3 2021	Q4 2021	Q1 2022	Q2 2022	Q3 2022	Q4 2022	Q1 2023	Q2 2023		
Uber	San Francisco	15	17	17	17	18	19		13	11	12	12	13					14		14
	San Diego	25	12		15															
	Santa Clara	25	17	17	17	16	18		17	21	23		19							
	San Mateo	25	17	17	16	15	17		18	13	14	15	15	17		15				17
	Ventura	25	22	4	20		4		5				21							
	San Joaquin	25	6	14	4	13					11									
	Sacramento	25	27	40					32											
	Riverside	30	2	11	8	14	5	4	10											
	Orange	25	12	11	10	10	9	11	10			12								
	Napa	30	13							29										
	Marin	30	24	17	21	26			25	23		26								
	Los Angeles	25	12	10	9	14	18	18	19			25	24							19
	Contra Costa	25	18	18	17	17	19		20	18		20	21							
	Alameda	25	16	15	14	14	18	28	18	17	18	16	17	16						
	Solano	25		20					23	21	15		17						13	
	Monterey	30		21																
	Kern	30				11														
	Stanislaus	25			21				14	14										
	Santa Cruz	25							4											
	Merced	30								25										
Sonoma	30										2									

Time values in green represent response times that are under the benchmark for that county. Black represents response times that are above the benchmark for that county.

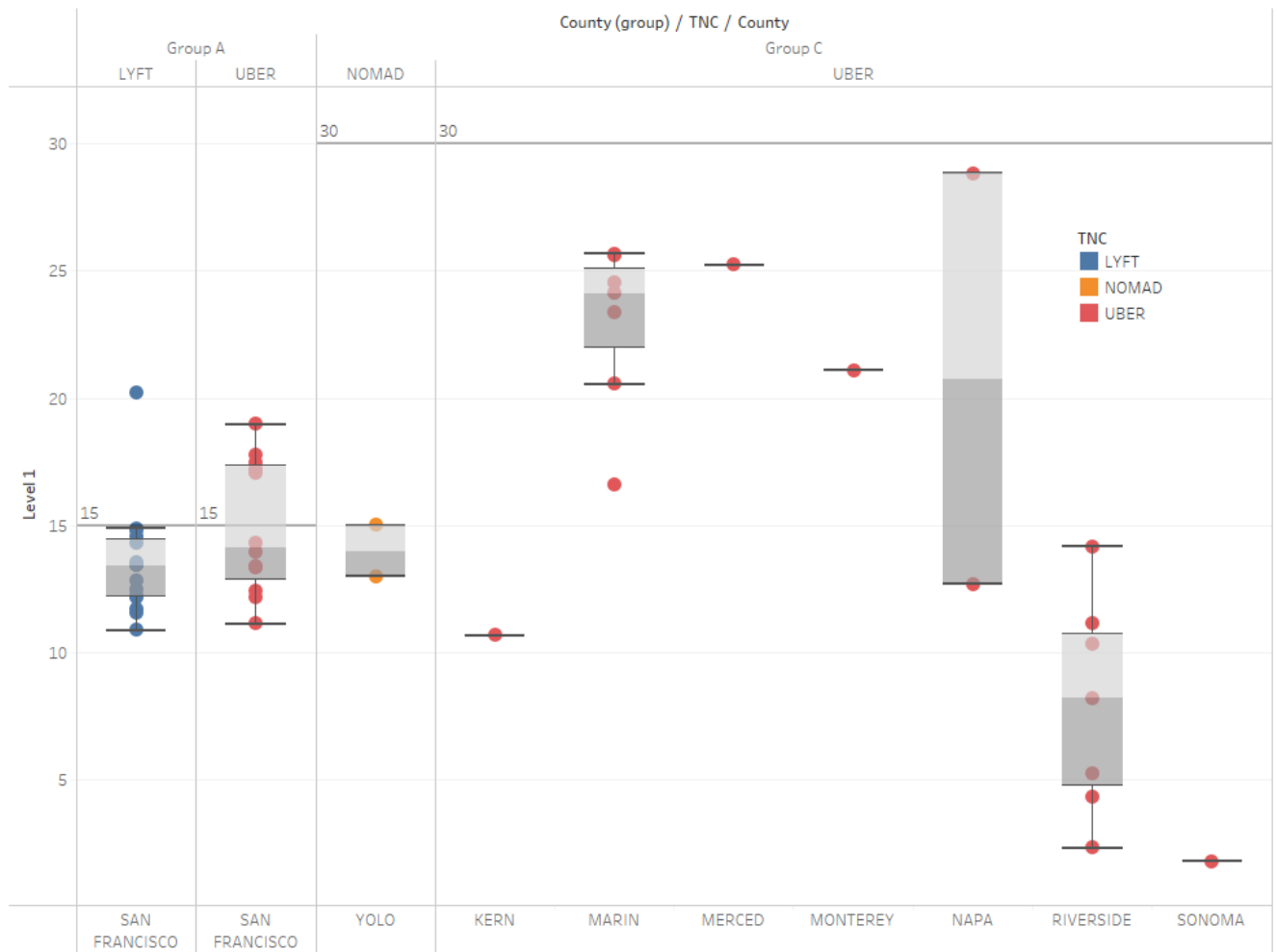
2023 TNC ACCESS FOR ALL: LEGISLATIVE REPORT

TNC County		Response Time (minutes)																
		Level 1 Benchmark	Track 2 Decision Standard (Level 1 – 50 th percentile)										Track 4 Decision Standard (Level 1 – Shifting Scale)					
			Q3 2019	Q4 2019	Q1 2020	Q2 2020	Q3 2020	Q4 2020	Q1 2021	Q2 2021	Q3 2021	Q4 2021	Q1 2022	Q2 2022	Q3 2022	Q4 2022	Q1 2023	Q2 2023
Lyft	Los Angeles	25	28	28	27	24	23	22	22		24	24	21	21	21	22	21	20
	San Francisco	15	20	15	14	15	11	13	15	13	14		13	12	12	12	12	12
Nomad	Los Angeles	25	10	12	11		10	9										
	Santa Clara	25		14	14	11												
	Yolo	30					15	13	13									

Time values in green represent response times that are under the benchmark for that county. Black represents response times that are above the benchmark for that county.

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 generally show a more reliable service in that there is low 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 2023)



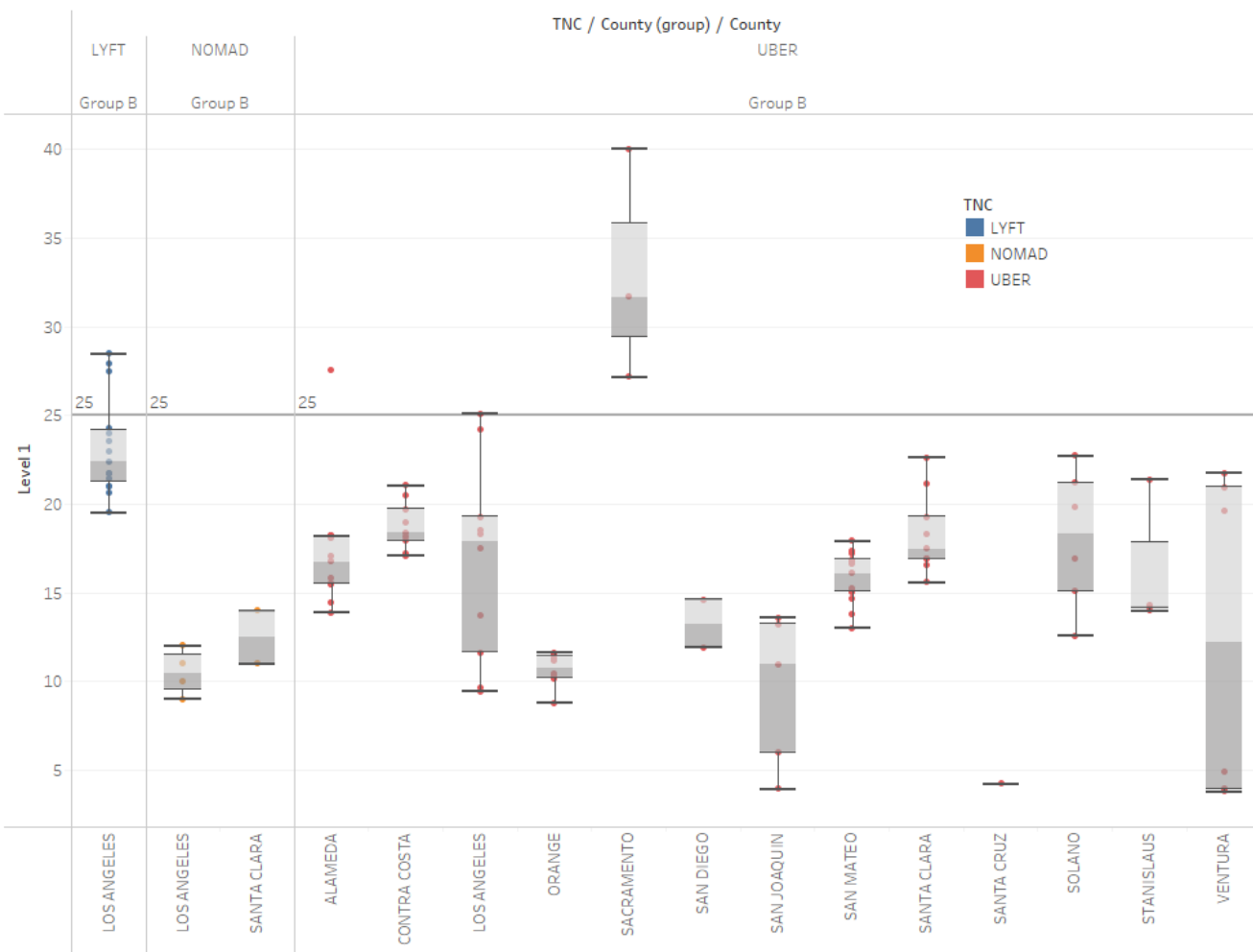
The distribution of response times in counties under Group C exhibits significant variation. As the box plots in Figure 9 illustrate the response times in Yolo, Marin, and Riverside are very different from each other. Yolo registered Level 1 response times between 13-15 minutes, Riverside’s fluctuated between 2-14 minutes and Marin’s 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 the actual similarities in how fast or slow WAV drivers respond to trip requests. 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 20-28 minutes, with 80% of quarters within the required 25-minute benchmark for Group B. The 20% 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 2023)



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 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 2023, across all counties was approximately 78%, and Lyft’s average was 61%. 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 significantly fewer offsets per county, 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 2023



Trip Completion Standard

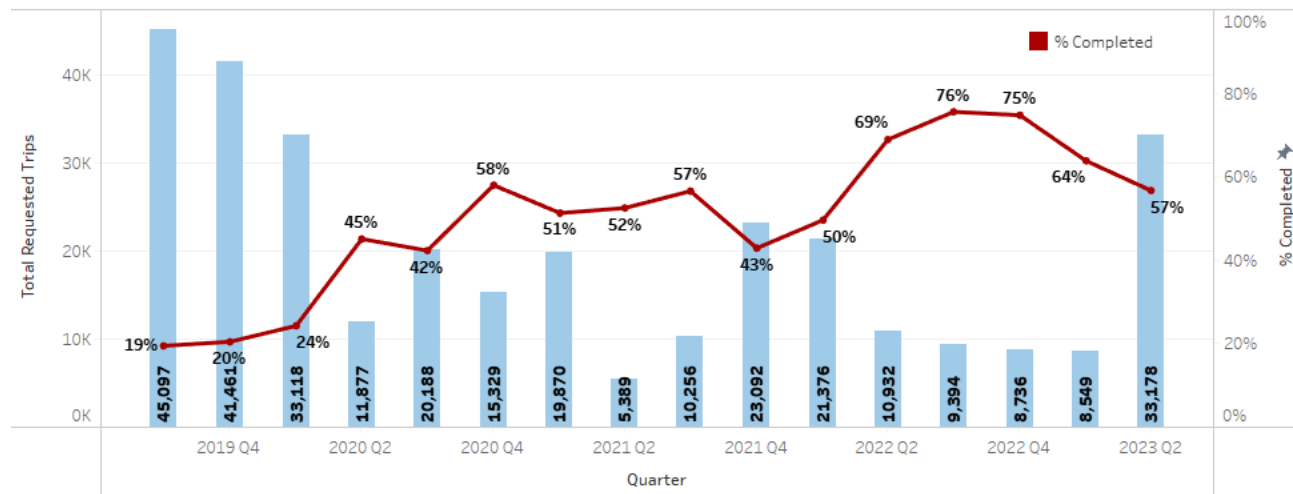
Trip Completion Rates Have Steadily Increased Over Time, but Have Started to Decrease in 2023

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 2023 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. Lyft has maintained higher trip completion percentages since the start of the Access for All Program, but Uber’s percentage of completed trips has risen to within eight percent of Lyft’s rate in Q2 2023.

Figure 13: Quarterly Total Completed Trips by TNC

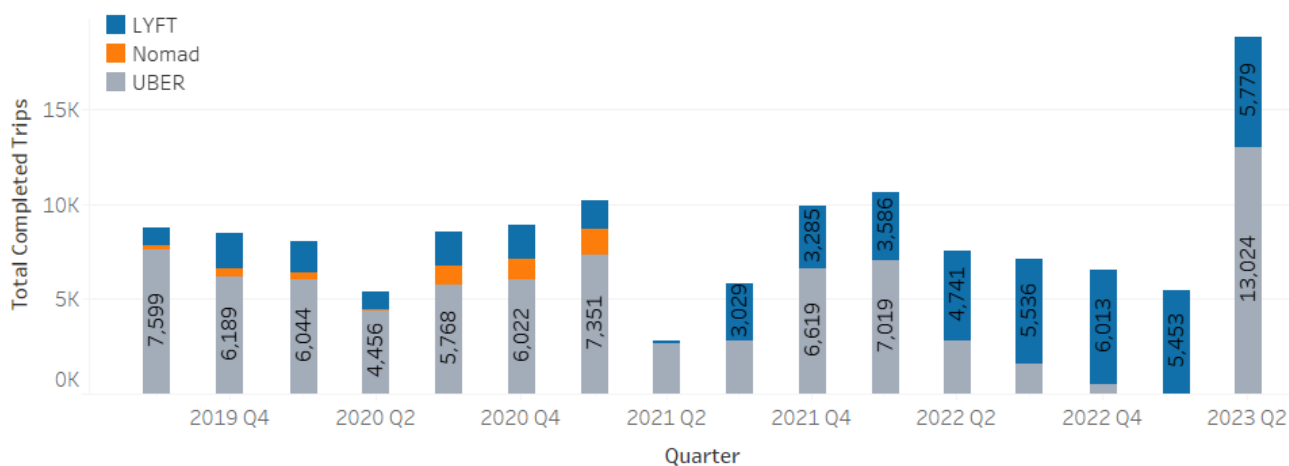
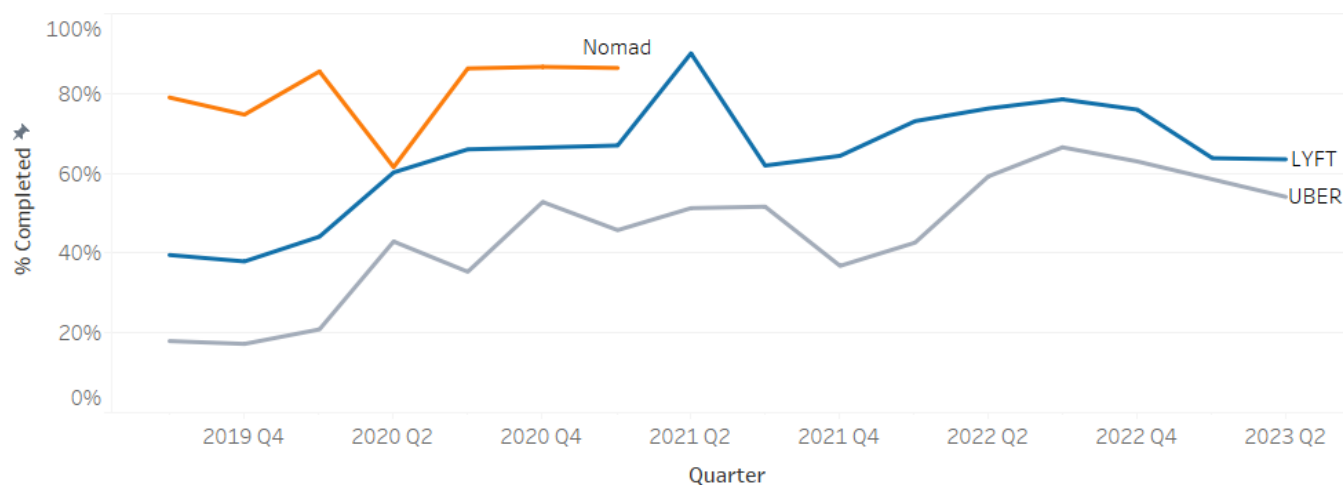


Figure 14: Trip Completion Rate by TNC



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:

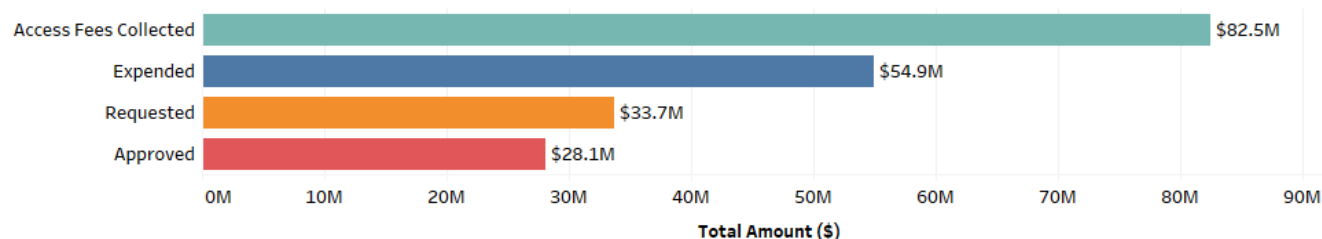
- 1) A completed “Eligible WAV Expenses” worksheet indicating how the funds were expended in a given quarter and list the amount expended for each item. A qualifying offset expense includes: (1) a reasonable, legitimate cost that improves a TNC’s WAV service, and (2) incurred in the quarter for which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

TNCs Have Expended Almost \$55 Million, Requested \$34 Million, and Been Reimbursed \$28 Million Over the Course of the Program

WAV 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: WAV Expenditure to Date (Q3 2019 – Q2 2023)



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 about \$55 million in their WAV service programs from Q3 2019 to Q2 2023, as shown in Figure 15. Approximately \$34 million have been requested in the offset process, of which \$28 million have been reimbursed to TNCs since Q3 2019 for trips that meet the Program’s performance thresholds. The roughly \$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 about \$977,000 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 \$300,000. For Q3 2021, Uber requested about \$635,000 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 \$62,500 for the remaining four counties that met all the offset requirements.

Figure 16 and Table 11 below break down expenditures into five main categories. About \$36 million (about 90%) of total TNC expenditures from Q3 2019 to Q2 2023 cover partnership costs, which mostly include costs associated with contracting third-party WAV providers. The remaining 10% 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 77%. Nomad spent 100% of its investments on operational costs to cover wages, salaries, and benefits for WAV drivers.

Figure 16: Percent of WAV Expenditures by Category and TNC (Q3 2019 – Q2 2023)

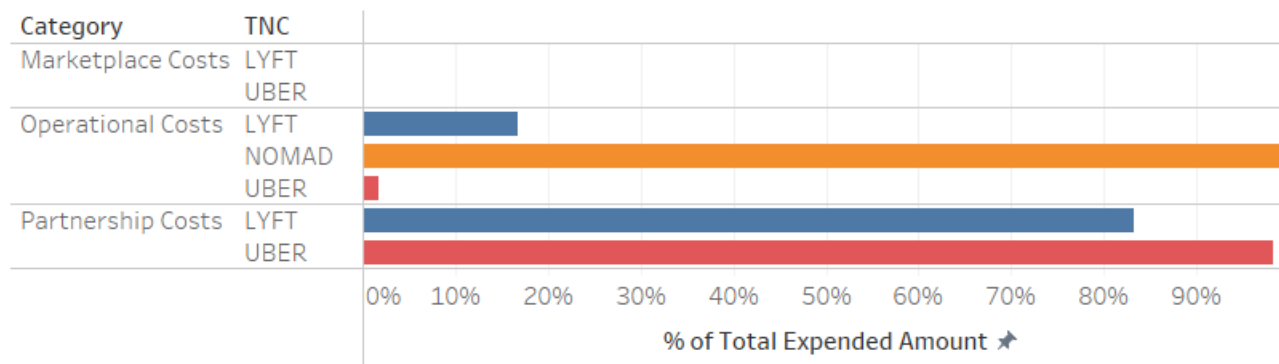


Table 11: Total WAV Expenditures by Category and TNC

TNC	Category			Grand Total
	Marketplace Costs	Operational Costs	Partnership Costs	
LYFT	\$7,001	\$2,833,350	\$14,135,578	\$16,975,929
NOMAD		\$638,353		\$638,353
UBER	\$19,197	\$644,145	\$37,359,322	\$38,022,664
Grand Total	\$26,198	\$4,115,847	\$51,494,900	\$55,636,946

TNCs Requested Most but Not All of the Funds they Spent; TNCs Received Most but Not All of the Funds they Requested

Figure 17 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 17: Quarterly WAV Expenditures: Requested vs. Approved

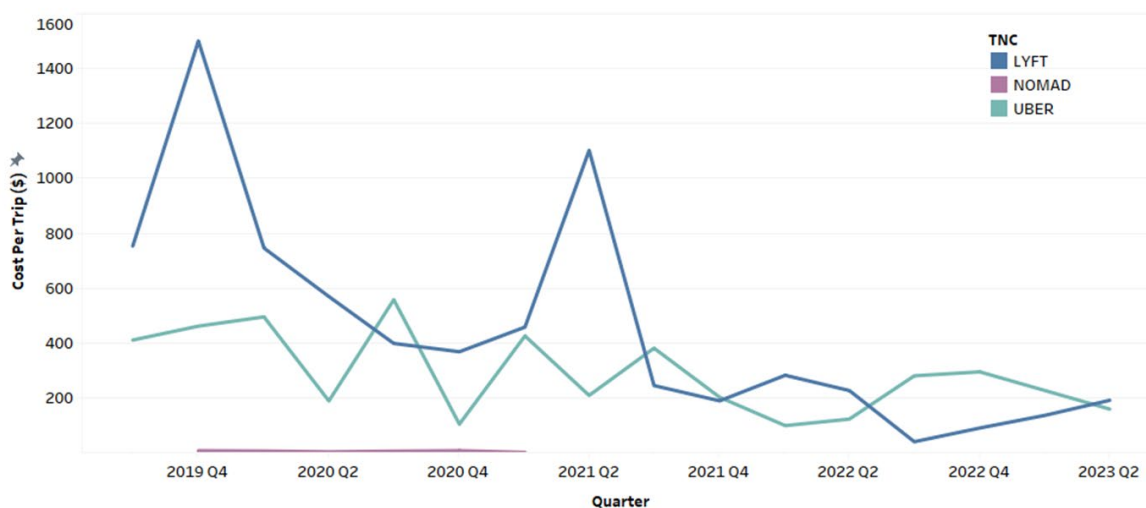


Based on TNCs’ Reported Expenditures, Per-Trip Cost to the Program Has Declined Over Time, but Remains High. However, Decreasing Overall Expenditures and Increasing Ridership Could Lead to a Reduction in Per-Trip Cost.

The downward trend in quarterly WAV-related expenditures, however, does not necessarily translate to declining cost per WAV trip. Figure 18 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.

Results show a highly volatile trend with quarterly cost per trip across TNCs showing significant differences, which are related to the WAV service coverage for each TNC. Uber and Lyft’s costs per trip remain above \$150 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 \$456 for Lyft (\$176 over the last 8 quarters) and \$293 (\$220 over the last 8 quarters) for Uber since the inception of the Program, while the average for Nomad was only \$6 per trip. 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. 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 2023, each WAV trip costs about \$160 for Uber and \$192 for Lyft.

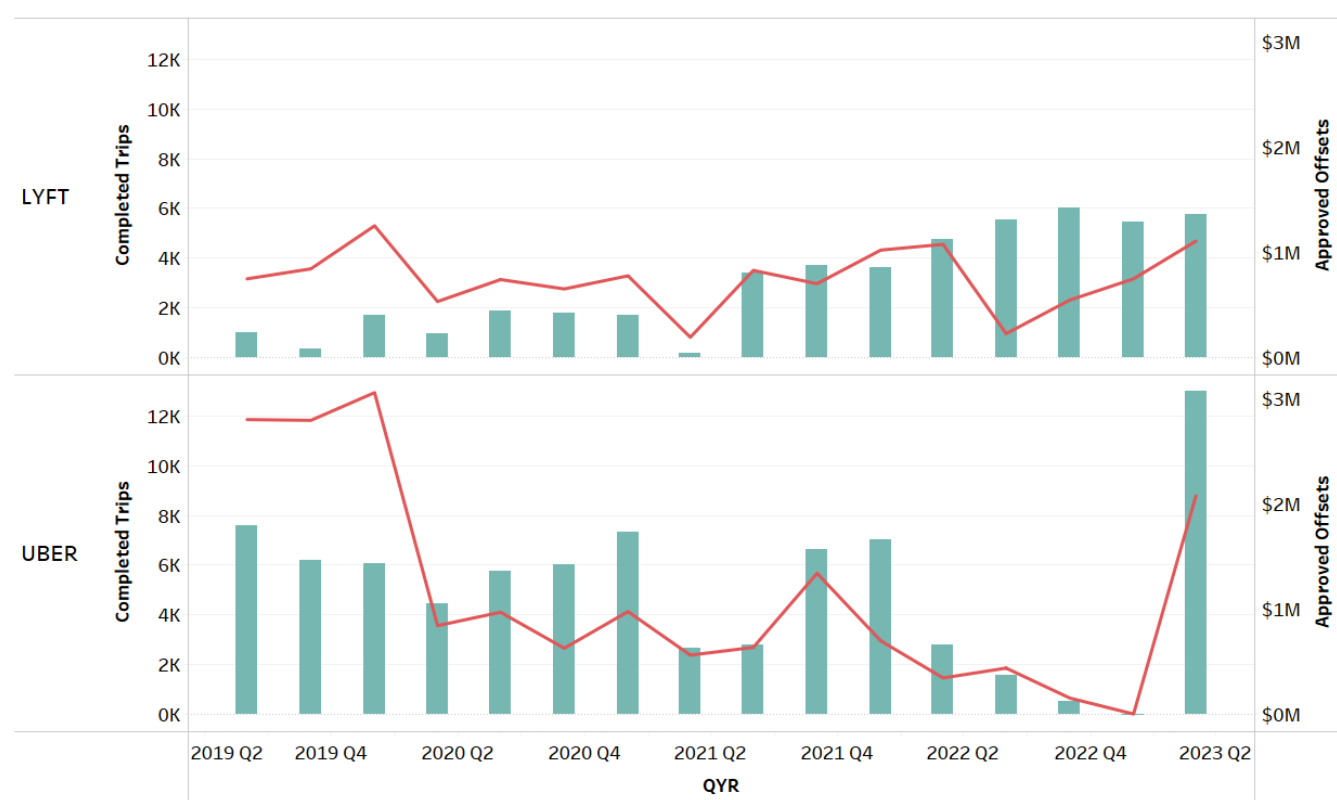
Figure 18: Quarterly Cost Per WAV Trip by TNC



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. Nomad partnered with cities and transit agencies that had existing WAV programs and then operated and managed them using their dispatching technology platform on their behalf. As a result, Nomad only invested \$500,000 in operational costs over the six quarters it requested offsets, which is substantially lower than the \$36 million in partnership costs incurred by Uber and Lyft from their contracts with WAV providers over sixteen quarters.

Although these per-trip costs are still high, the trend 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 19 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 19: 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 in a given quarter. Over the length of the Access of All Program, Lyft, Uber, and Nomad respectively conducted outreach in 184, 164, and 8 instances. 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 2023)

Outreach Method	Lyft	Nomad	Uber	Grand Total
Blog post			1	1
Call and Email	3			3

Outreach Method	Lyft	Nomad	Uber	Grand Total
Consultation			2	2
Direct marketing	11		4	15
Email	87	6	63	156
Event	1	1	2	4
In-app notification			2	2
Interview			21	21
Meeting	35			35
Partnership exploration			1	1
Phone call	38		15	53
Presentation	9		50	59
Social Media		1		1
Speaking engagement			2	2
Sponsorship			1	1
Grand Total	184	8	164	356

Each method represents an individual outreach effort. For example, Lyft has reported they have had 87 email correspondences with the local community.

Complaints/Comments

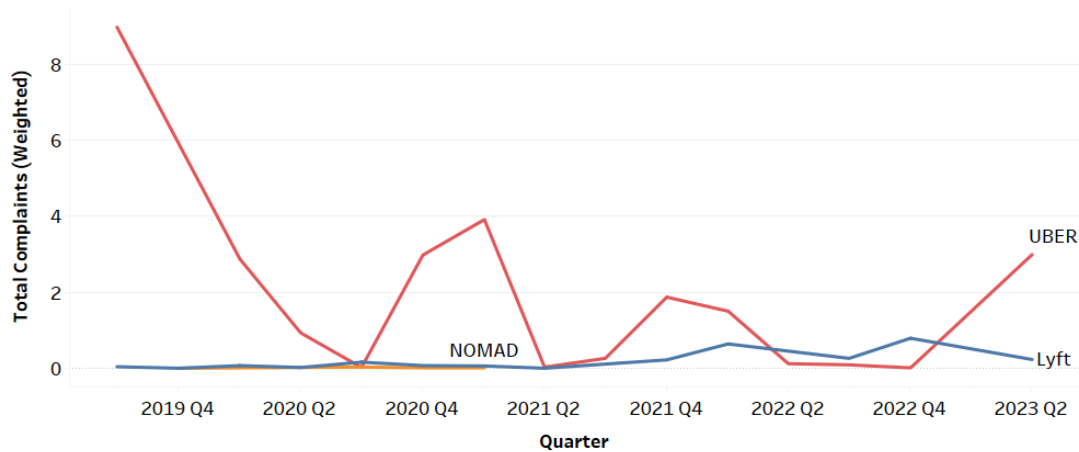
TNCs seeking an offset are also required by the CPUC to provide the number of complaints they received related to WAV drivers and services, by quarter and geographic area. As adopted in D.20-03-007, WAV customer complaints must be also categorized into the following issues: securement issue, driver training, vehicle safety and comfort, service animal, stranded passenger, and other. Since the inception of the Access for All Program, a total of 997 customer complaints were submitted to the TNCs. Uber accounted for 80% of the total customer complaints, Lyft accounted for 16%, and Nomad 4%. Compared to the total number of WAV trips completed by all TNCs, Uber has completed 60% of all WAV trips, Lyft has completed 36%, and Nomad has completed 3%. These data suggest that Uber has a 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 where an offset was requested.

Table 13: Customer Complaints (Q3 2019 – Q2 2023)

Complaint Category	Lyft	Nomad	Uber	Grand Total
Driving Training	19	12	41	72
Other	81	16	738	835
Securement Issues	9	1	2	12
Service Animal	2			2
Securement Issues				0
Vehicle Safety and Comfort	46	8	22	76
Grand Total	157	37	803	997

When requesting offsets, Uber has provided more customer complaints than Lyft in all but three quarters. However, trends in historical customer complaints are difficult to analyze because of D.20-07-003 requirement to only report WAV data for quarters where an offset was requested.

Figure 20: Quarterly Trend in Customer Complaints Weighted by TNC Total WAV Trips (Q3 2019 – Q2 2023)



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)

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.

Funding Allocation to Access Fund Administrators

Access Fund Administrators

In D.[20-03-007](#), the CPUC authorized Access Fund Administrators,¹⁴ a term used to generally 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.¹⁵ 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.¹⁶ 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 CPUC¹⁷
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

¹⁴ See [D.21-03-005](#).

¹⁵ See [Access for All Program Overview and Requirements](#).

¹⁶ See Notice of Fund Availability under "[Funding](#)".

¹⁷ 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 will be 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) on an annual basis. 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 Cycle 1: 2021-2022

On May 3, 2021, the CPUC received 10 LAFA applications, including five MPOs, and five CTCs. On June 28, 2021, the CPUC voted and passed [Resolution TL-19133](#) approving 10 Local Access Fund Administrators and their corresponding Access Fund awards.

Table 15: Access Fund Amounts Awarded Per LAFA for Funding Year 2021-22

Lafa Applicant	Entity Type	Geographic Areas Covered	Total Access Funding
Contra Costa Transportation Authority	CTC	Contra Costa	\$279,949.83
Fresno Council of Governments	MPO	Fresno	\$222,436.80
Los Angeles County Metropolitan Transportation Authority	CTC	Los Angeles	\$6,629,057.88
Riverside County Transportation Commission*	CTC	Riverside	\$556,432.20
San Diego Association of Governments	MPO	San Diego	\$2,976,476.08
San Luis Obispo County of Government	MPO	San Luis Obispo	\$79,751.50
Santa Barbara County Associations of Government	MPO	Santa Barbara	\$211,697.60
Shasta Regional Transportation Agency*	MPO	Shasta	\$24,730.60
Solano Transportation Authority	CTC	Solano	\$92,661.68
Transportation Agency for Monterey County	CTC	Monterey	\$98,405.79

LAFAs Applicant	Entity Type	Geographic Areas Covered	Total Access Funding
TOTAL			\$11,171,599.96

*Both Riverside and Shasta decertified as the LAFAs shortly after approval primarily due to funding challenges amongst other reasons.

Of the 10 LAFAs, only two LAFAs (San Luis Obispo County of Government and Solano Transportation Authority) were able to complete the project execution (develop, solicit, award, liquidate) within a 24-month timeframe. Many LAFAs were unable to meet the July 1, 2022 obligation deadline due to a number of reasons including the delayed release of CPUC's [D. 21-11-004](#) which was released November 2021 regarding Access Provider eligibility. Until this information was known, the LAFAs were unable to make substantive progress on the Call for Projects or conduct sufficient and meaningful outreach on the Program given the impacts to recipients of the Access Funds. Other reasons for the delay were: lack of Access Provider applicants due to the extensive reporting requirements, and lack of capacity to be able to implement the Program. Recognizing that 2021 was the first year of implementation including some of the challenges the LAFAs were experiencing, the deadline of selecting an Access Provider by July 1, 2022 was extended to a reasonable date the LAFAs requested. Table 16 below summarizes the status of each LAFAs in their Access Provider selection process utilizing Cycle 1 Access Funds as of July 1, 2022.

Table 16: Access Provider Selection Status Utilizing Cycle 1 Funds as of July 1, 2022.

LAFAs	Approved Access Providers
Contra Costa Transportation Authority	Extension Granted
Fresno Council of Governments	Extension Granted
Los Angeles County Metropolitan Transportation Authority	Extension Granted
Riverside County Transportation Commission	N/A (Rescinded LAFAs status)
San Diego Association of Governments	Extension Granted
San Luis Obispo County of Government	Ventura Transit System, Inc.
Santa Barbara County Associations of Government	Extension Granted
Shasta Regional Transportation Agency	N/A (Rescinded LAFAs status)
Solano Transportation Authority	Rio Vista Delta Breeze with Uber Platform
Transportation Agency for Monterey County	Extension Granted

SLOCOG selected Ventura Transit System, Inc. (VTS) due to their ability to deliver trips with the shortest response times. As of July 1, 2022, VTS received few trip requests because the fares were expensive. VTS was not aware that the Access Funds could be used towards subsidizing fares but

have since modified the fare structure to subsidize rides. CPUC will continue to monitor the progress of VTS and their performance.

Solano Transportation Authority (STA) and Rio Vista Delta Breeze have partnered with Uber Transit as a result of a Request for Qualifications process to provide technology and support of an on-demand transportation service. This service is operated by the Rio Vista Delta Breeze using trained drivers and accessible vehicles listed as the Wheelchair Accessible Vehicle Provider for the City of Rio Vista. As of July 1, 2022, STA reported ridership of approximately 891. STA continues to work with the Solano County Paratransit Coordinating Council. The Council serves as an advocate for improved availability of transit services for older adults, people with disabilities, minorities, economically disadvantaged, and other transit dependent persons.

Local Access Fund Administrator Funding Cycle 2: 2022-2023

On April 1, 2022, the CPUC received 10 LAFA applications, including four MPOs, two RTPAs, and four CTCs. On June 23, 2022, the CPUC voted and passed [Resolution TL-19138](#) approving 10 Local Access Fund Administrators and their corresponding Access Fund awards. Of the 10, eight recertified and two (Santa Cruz County and Ventura County) are new.

Table 17: Access Fund Amounts Awarded Per LAFA for Funding Year 2022-23

LAFAs Applicant	Entity Type	Geographic Areas Covered	Total Access Funding
Contra Costa Transportation Authority	CTC	Contra Costa	\$204,388.35
Fresno Council of Governments	MPO	Fresno	\$136,950.50
Los Angeles County Metropolitan Transportation Authority	CTC	Los Angeles	\$2,624,863.68
San Diego Association of Governments	MPO	San Diego	\$1,798,113.00
San Luis Obispo County of Government	MPO	San Luis Obispo	\$42,968.42
Santa Barbara County Associations of Government	MPO	Santa Barbara	\$192,838.38
Santa Cruz County Regional Transportation Commission	RTPA	Santa Cruz	\$134,587.00
Solano Transportation Authority	CTC	Solano	\$76,570.57
Transportation Agency for Monterey County	RTPA	Monterey	\$70,506.99
Ventura County Transportation Commission	CTC	Ventura	\$293,789.16
TOTAL			\$5,575,576.05

Table 18: Access Provider Selection Status Utilizing Cycle 2 Funds as of July 1, 2023

LAFAs	Approved Access Providers
Contra Costa Transportation Authority	Tri-Delta Transit

Lafa	Approved Access Providers
Fresno Council of Governments	Fresno County Rural Transportation Agency
Los Angeles County Metropolitan Transportation Authority	Preparing Funding Agreements for Five Access Providers
San Diego Association of Governments	Facilitating Access to Coordinated Transportation (FACT)
San Luis Obispo County of Government	Ventura Transit System, Inc.
Santa Barbara County Associations of Government	Ventura Transit System, Inc.
Santa Cruz County Regional Transportation Commission	Scoring in Progress
Solano Transportation Authority	Rio Vista Delta Breeze with Uber Platform
Transportation Agency for Monterey County	Gateway Center for Monterey County
Ventura County Transportation Commission	Goal Coast Transit District and Ventura Transportation Services

While SLOCOG and STA continue to implement the WAV service, the other LAFAs have either just selected their Access Provider(s) and or are about to contract with the selected Access Provider(s) by preparing the funding agreement(s). Given the delay of the selection process, there is very limited to no data reported from the Access Providers for this cycle. 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 when it becomes available to further assess the performance of the Access Providers.

Local Access Fund Administrator Funding Cycle 3: 2023-2024

On April 1, 2023, the CPUC received 10 Lafa applications, including three MPOs, two RTPAs, four CTCs, and one Public Transit Agency. On June 29, 2023, the CPUC voted and passed [Resolution TL-19143](#) approving 10 Local Access Fund Administrators and their corresponding Access Fund awards.

Table 19: Access Fund Amounts Awarded Per Lafa for Funding Year 2023-24

Lafa Applicant	Entity Type	Geographic Areas Covered	Total Access Funding
Contra Costa Transportation Authority	CTC	Contra Costa	\$11,247
Fresno Council of Governments	MPO	Fresno	\$46,882
Los Angeles County Metropolitan Transportation Authority	CTC	Los Angeles	\$1,864,487
San Diego Association of Governments	MPO	San Diego	\$952,043
San Francisco Municipal Transportation Agency	Transit	San Francisco	\$4,045,161
San Luis Obispo County of Government	MPO	San Luis Obispo	\$23,104

LAFAs Applicant	Entity Type	Geographic Areas Covered	Total Access Funding
Santa Cruz County Regional Transportation Commission	RTPA	Santa Cruz	\$18,231
Solano Transportation Authority	CTC	Solano	\$29,510
Transportation Agency for Monterey County	RTPA	Monterey	\$20,241
Ventura County Transportation Commission	CTC	Ventura	\$60,072
TOTAL			\$7,070,978

The 10 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, 2024.

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.

Progress of Request for Proposal Solicitation for Statewide Access Fund Administrator

CPED is currently in the process of preparing a Request for Proposal and anticipates the SAFA to start by July 1, 2024 in time for Funding Cycle 4. The notice of funding availability for Cycle 4 utilizing FY 2022-2023 Access Fees is anticipated to be released in January 2024. The roles and responsibilities of the SAFA will be like the LAFAs'.

Table 20 below shows the remaining balance through June 2022. The remaining balance reflects fees collected through June 2022, offsets and exemptions approved from Q3 2019 through Q2 2022, funds awarded to the LAFAs, and estimated audit contract expense. The remaining balance of \$14.7M will be allocated to the SAFA to expand on-demand WAV throughout the remaining geographic areas of California.

Table 20: Remaining Access Funding Balance Through June 2022

Access fees collected through June 2022	\$55.8M
Less: Approved offsets/exemptions through June 2022	\$17M
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: Audit expense	\$800,000
Remaining Balance through June 2022	\$14.7M

Table 21 below further breaks down the remaining balance of \$14.7M by County. The 10 LAFAs that were approved for cycle three have been removed to reflect the most up to date balance.

Table 21: 2023-2024 Projected Access For All Funding Availability

COUNTY	ESTIMATED AVAILABLE FUNDS	COUNTY	ESTIMATED AVAILABLE FUNDS
ALAMEDA	\$1,652,470	ORANGE	\$3,536,321
ALPINE	\$0	PLACER	\$186,656
AMADOR	\$203	PLUMAS	\$410
BUTTE	\$88,296	RIVERSIDE	\$1,029,701
CALAVERAS	\$43	SACRAMENTO	\$1,632,650
COLUSA	\$142	SAN BENITO	\$2,197
CONTRA COSTA	(LAFAs Approved) \$11,247	SAN BERNADINO	\$1,158,482
DEL NORTE	\$30	SAN DIEGO	(LAFAs Approved) \$952,043
EL DORADO	\$55,551	SAN FRANCISCO	(LAFAs Approved) \$4,045,161
FRESNO	(LAFAs Approved) \$46,882	SAN JOAQUIN	\$229,750
GLENN	\$111	SAN LUIS OBISPO	(LAFAs Approved) \$23,104
HUMBOLDT	\$14,211	SAN MATEO	\$1,421,245
IMPERIAL	\$14,615	SANTA BARBARA	\$0
INYO	\$13	SANTA CLARA	\$2,297,110
KERN	\$357,398	SANTA CRUZ	(LAFAs Approved) \$18,231
KINGS	\$5,373	SHASTA	\$41,121
LAKE	\$83	SIERRA	\$0
LASSEN	\$16	SISKIYOU	\$26
LOS ANGELES	(LAFAs Approved) \$1,864,487	SOLANO	(LAFAs Approved) \$29,510
MADERA	\$3,245	SONOMA	\$259,502
MARIN	\$187,661	STANISLAUS	\$126,900
MARIPOSA	\$164	SUTTER	\$11,759
MENDOCINO	\$485	TEHAMA	\$277
MERCED	\$31,894	TRINITY	\$0
MODOC	\$0	TULARE	\$44,143
MONO	\$398	TUOLUMNE	\$427
MONTEREY	(LAFAs Approved) \$20,241	VENTURA	(LAFAs Approved) \$60,072
NAPA	\$136,202	YOLO	\$174,353
NEVADA	\$6,320	YUBA	\$7,617
STATEWIDE TOTAL	\$21,786,549 - \$7,070,978 (LAFAs Approved) = \$14,715,571		

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).¹⁸ 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 2021 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 estimated that 11.2%, or about 4,324,000 Californians, have disabilities as summarized in Table 22 below. Of these, about 2,080,000 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 58%) are over the age of 65, while 40% are between the ages of 18 to 64. Only about 2% are under the age of 18. These insights suggest that potential WAV service customers could be from all age groups.

Table 22: California's Population with Disability by Type

Disability Type	Population with Disability	% Share of Total CA Population
Hearing Difficulty	1,126,836	3%
Vision Difficulty	779,818	2%
Cognitive Difficulty	1,597,223	4%
Ambulatory Difficulty	2,080,280	6%
Self-care Difficulty	950,314	3%
Independent Living Difficulty	1,640,802	5%

¹⁸ 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 23: Breakdown of Population with Ambulatory Difficulty by Age Group

Age Group	Population with Ambulatory Issues	Percentage Share
Under 18	35,920	2%
18 to 64	837,552	40%
Over 65	1,206,808	58%
All	2,080,280	100%

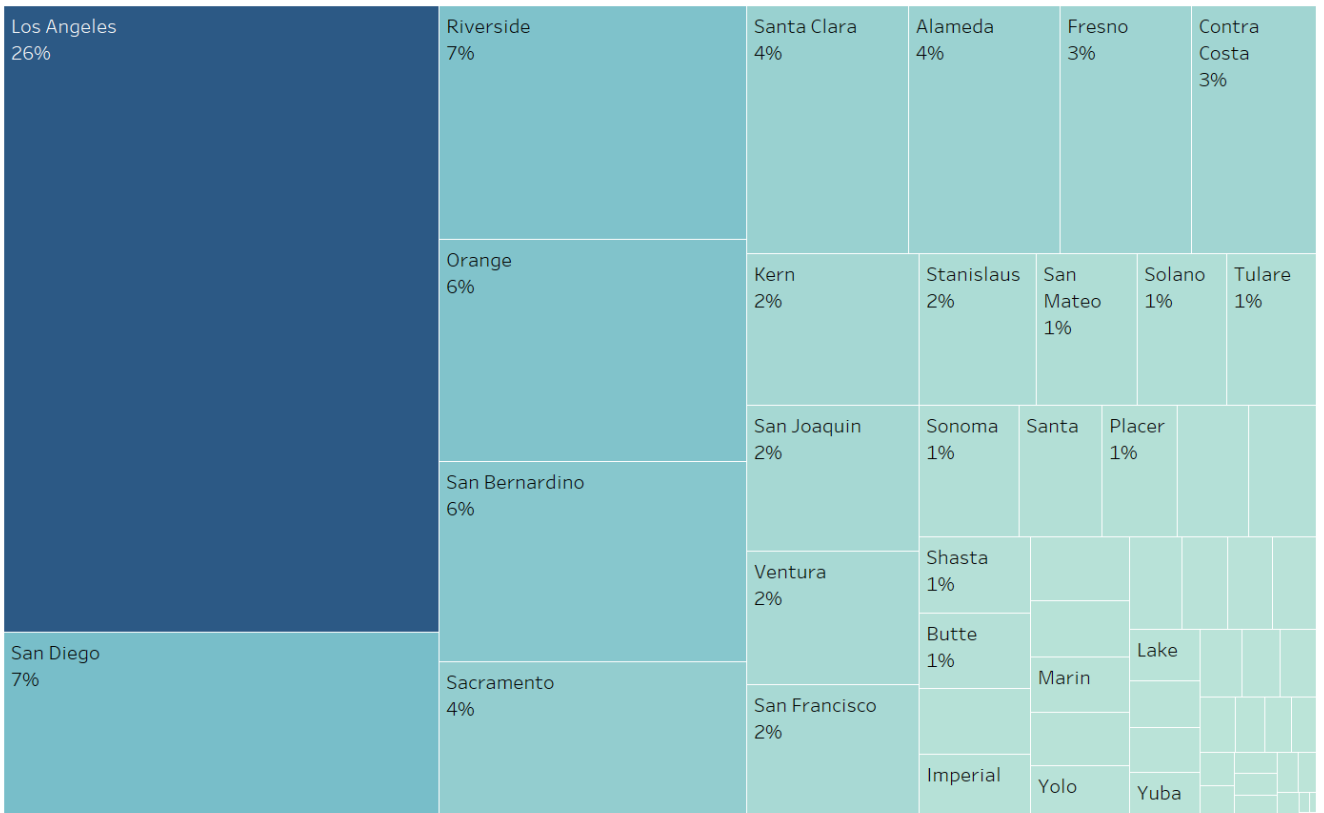
The ACS data for those with ambulatory difficulty in California can also be broken down by county. Figure 21 below shows the distribution of percentage as a share of total population with ambulatory difficulty for each of California’s 58 counties. The largest population with ambulatory issues is in Los Angeles, which consists of a quarter (26%) of the total population with ambulatory issues in California, followed by San Diego with 8% and Riverside with 7%. The remaining top 10 counties—Orange, San Bernardino, Sacramento, Santa Clara, Alameda, Contra Costa, and Fresno—represent about 30% 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% of the population lives with ambulatory difficulties. In order of highest to lowest, they are Modoc County, Trinity County, Calaveras County, Del Norte County, Lake County, Lassen County, and Mariposa County. These counties represent 190,000 Californians, almost 22,000 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.

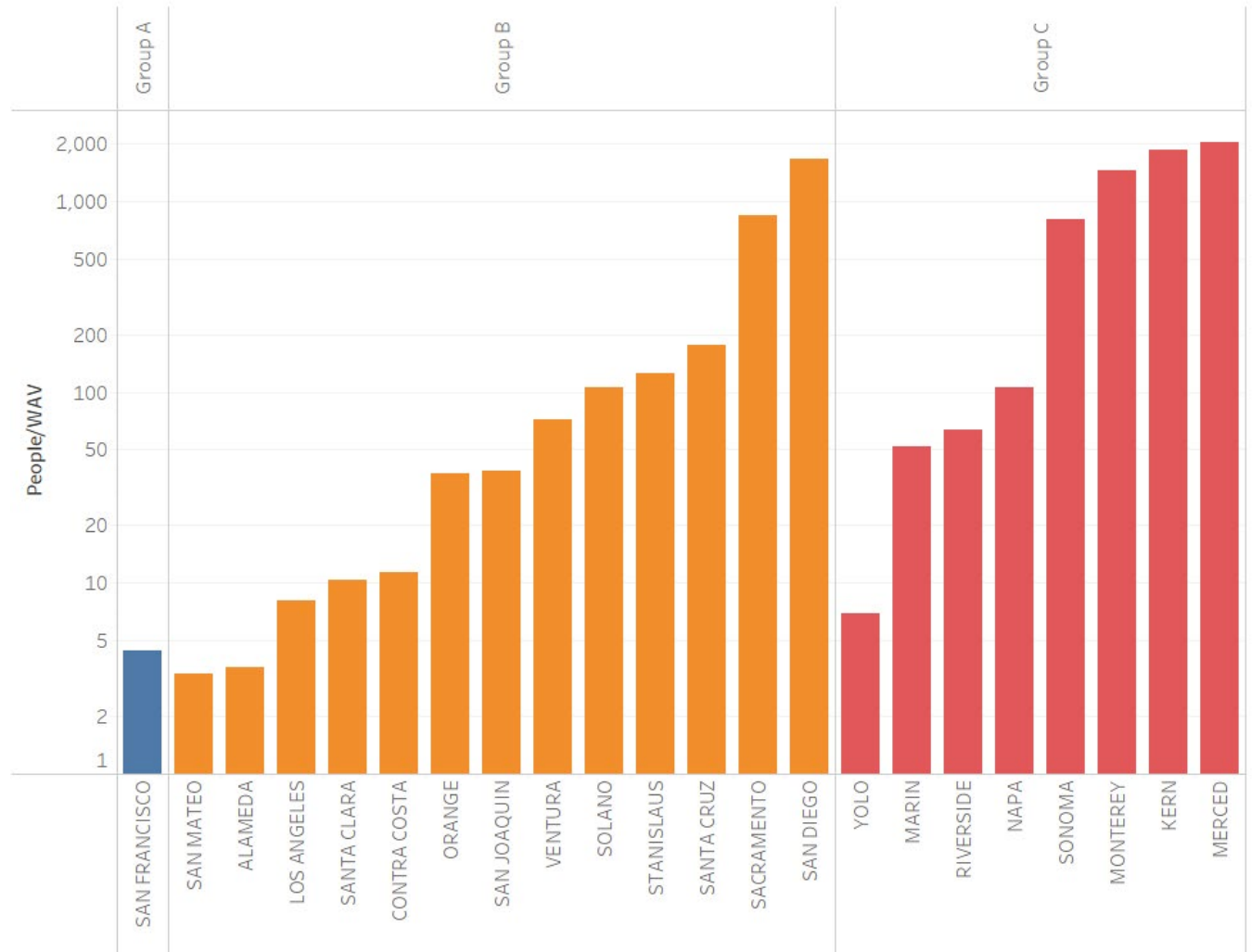
Further analysis of the ACS disability dataset is needed to fully understand the population with disability, especially at a localized level. One suggestion is to dissect the data into racial and gender groups, and other socioeconomic variables such as income, poverty, and education levels. It is also 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 21: 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 22 shows the number of people in ambulatory difficulties in each county per average quarterly WAV hours on a logarithmic scale. The data was presented this way 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 that there are opportunities for improvement in service per person in certain counties.

Figure 22: Number of People with Ambulatory Difficulty in County per Average Quarterly WAV Hours



Program Successes

The Program Supports Growth in On-Demand Wheelchair Accessible Vehicle Coverage

Since the Program began in 2019, the number of counties where TNC WAV service has been funded by the Program has increased from 14 to 22. The original 14 counties are home to 1.5 million Californians with ambulatory difficulties, and the 8 added counties are home to almost 190,000 more Californians with ambulatory difficulties.

On-Demand Wheelchair Accessible Vehicle Response Times Have Improved

Response times in most counties have become faster at the 50th percentile. For example, Lyft's service in both San Francisco and Los Angeles was 8 minutes faster in the most recent quarter compared to the first quarter of reported data, a 40% and 30% reduction in wait times respectively. In San Francisco, Uber's service has improved by 3 minutes, going from 17 minutes in 2019 to 14 minutes in 2023, an almost 20% reduction, while in Los Angeles, the wait times have increased by 7 minutes, an almost 60% increase in wait times, from 12 minutes in 2019 to 19 minutes in 2023. Overall, wait times appear to be decreasing, with most of the gains being in counties with already high wait times. The few places where wait times have increased are largely in counties with low wait times early in the Program's life cycle.

On Demand Wheelchair Accessible Vehicles are Providing More Trips

The number of trips completed increased in the study period. In the most recent quarter of data reported, Q2 2023, the number of trips completed was over twice the number of trips completed in the first quarter of the Program, Q3 2019. In terms of raw numbers of trips completed, that is 8,794 in Q3 2019 and 18,803 in Q2 2023. Notably, this increase was largely driven by Uber, who reported 70% more trips in Q2 2023 than in any other quarter. Uber claims it does not know what caused this increase but speculates that it could be due to continuing informational programs and improving service quality. Lyft's service has been increasing steadily, going from almost 1,000 quarterly trips in Q3 2019 to about 5,800 trips in Q2 2023. Going forward, the requirement to report all WAV trips, regardless of whether an offset is requested, will help illuminate future trends.

Program Opportunities

Increase Participation of Local Access Fund Administrators to Expand On-Demand Wheelchair Accessible Vehicle Coverage

To apply to be a LAFA, the CPUC developed a simple application process in hopes of attracting applications from MPOs/RTPAs/CTCs/Transit Agencies.

Despite having a simple application process, only 13 applications were received, 2 of which were rescinded, leaving 47 counties without a LAFA to develop WAV programs at the local level. We have subsequently investigated some of the issues that are facing LAFAs, including the two that rescinded their status and found their primary concern to be not being able to budget for the following year given the nature of the Program of annual volatility of Access Funds. For example, a county may receive a large amount of funding for one year but may receive very little to no funding the following year. This is because the amount of available funds is dependent on the following: (1) TNC trips (\$0.10 fee); (2) TNC's own investment in WAV service; and (3) TNC exemptions consistent with the Statute.

In addition to the issue of annual volatility of funds, the LAFAs have also expressed concerns regarding limited availability of funding in their counties. The concern is that administrative costs will likely exceed the 15% administrative allocation, and that until the funding increases, many cannot support the management of the Program while also providing WAV service via Access Providers. For example, in Cycle 1, Shasta Regional Transportation Agency (SRTA) applied to become a LAFA. They were approved \$24,730, where 15% or \$3,709 is to be allocated to SRTA for administrative cost of developing the WAV program. 85% or \$21,020 is to be allocated to Access Providers in Shasta County for providing WAV service. With only \$3,709 allocated for administrative cost, SRTA finds the “administrative requirements of the program too onerous for smaller regions that receive limited funding; until the administrative requirement become less burdensome, or funding increases substantially to warrant managing, SRTA cannot support the management of the program locally” and therefore rescinded their LAFA status. Although the issue of volatility of funds is unavoidable, there is an opportunity to increase funding availability in counties where there is very limited funding available to increase LAFA participation.

Reduce the Annual Competition Burden on Access Fund Administrators and Access Providers

Consistent with P.U. Code §5440.5(1)I and §5440.5(1)(F), Decision D.20-03-007 directed LAFAs to distribute Access funds annually on a competitive basis to Access Providers. P.U. Code §5440.5(1)(C) states, “The Commission shall distribute funds in the Access Fund on a competitive basis to Access Providers that establish on-demand transportation programs or partnerships to meet the needs of person with disabilities, including wheelchair users who need a WAV”. Paragraph (F)

further states “The Commission shall distribute funds...in the Access Fund within 90 days following the end of each year. If no Access Provider meets the requirements, funds shall remain in the Access Fund and be distributed the next year.”

One of the issues LAFAs faced over the course of the three funding cycles is the difficulty of having to go through the time- and labor-intensive task of releasing a Call for Projects every year to satisfy the Statute’s goal of a “competitive” process. This is burdensome for the LAFAs for various reasons, including: 1) the work requires additional staff resource time, even though currently there are already existing staff resource constraints, 2) there is already a limited amount of Access Funds available, and 3) the existing Access Provider(s) may already be doing a satisfactory or exceptional job of providing the WAV service. Given the many concerns already mentioned, requiring an annual competitive process deters LAFAs from participating. For example, in Cycle 1 Riverside County Transportation Commission (RCTC) applied to be a LAFA but ultimately rescinded their application due to “the administrative responsibilities to administer this program will likely exceed the administrative allocation.” They went on to state that “RCTC will continue to monitor the program and be engaged and if circumstances become more favorable for us, then will return to the CPUC with the full program outline to administer the program for Riverside County.” Recognizing the difficulties of an annual competitive process, there is an opportunity to improve the annual competition by reducing the annual competition burden on Access Fund Administrators and Access Providers.

Increase Access Provider Participation

As of July 1, 2023, 11 Access Providers have been approved to receive Access Funds to improve WAV service in their respective geographic area. In D.21-03-005, the CPUC determined on an interim basis that “an Access Provider shall be limited to transportation carriers that hold a CPUC-issued permit prior to applying to become an Access Provider.”¹⁹ Subsequently in D.21-11-004, the CPUC modified the Access Provider eligibility to allow a non-permitted carrier to apply as long as comparable safety protocols to the CPUC-issued permitting requirements are demonstrated in order to increase the pool of Access Providers. Unfortunately, due to the nature of the Program (i.e., volatility of funding year over year, brand new Program, extensive reporting requirements (all which are unavoidable), and re-compete each year), many potential Access Providers are hesitant to apply, and application rates have remained low. In some cases, no Access Provider applications were received, which resulted in the LAFAs having to release another Call for Projects. For example, Santa Cruz County Regional Transportation Commission, the LAFA for Santa Cruz County, released a Request for Proposal (RFP) that received no proposals by the original deadline. Santa Cruz later reissued another RFP with an extended deadline.

Although some of the concerns LAFAs raised are unavoidable, LAFAs have explored opportunities to increase Access Provider applicants. By modifying the requirement of an annual competitive process, the Access Funds can be allocated to provide WAV service instead of allocating funds for

¹⁹ See D.20-03-005 at OP 8.

the administrative costs of recertifying to be an Access Provider, especially given that many Access Providers already have very limited funding available to provide WAV service. Reducing the burden of having to apply every year provides an opportunity to increase Access Provider participation.

Increase Funding Stability and Sustainability

Consistent with P.U. Code §5440.5(1)(B)(ii), the CPUC required TNCs to collect an “Access Fee” in the amount of \$0.10 for each TNC trip and to remit the total fees collected to the CPUC by geographic area, consistent with the statute’s goal of WAV expansion. As of June 30, 2023, the TNCs have collected and remitted a total of \$82.5M Access Fees collectively. Of the \$82.5M, \$24.6M was collected and remitted in fiscal year 2019-2020, \$10.6M was collected and remitted in fiscal year 2020-2021, \$20.6M was collected and remitted in fiscal year 2021-2022, and \$26.7M was collected and remitted in fiscal year 2022-2023. Although fiscal years 2019-2020 and 2020-2021 included months when COVID occurred, data overall shows fluctuations in Access Fees collected due to variable demand for TNC services in this time period. TNCs may not have fully recovered from the pandemic, but there may be additional forthcoming disruptions from autonomous vehicle (AVs) passenger services that would affect the volume of trips provided by TNCs, which ultimately would affect the amount of Access Fees collected. The current framework only requires TNCs to collect the Access Fee; AV companies currently aren’t required to collect Access Fees because AVs are not licensed as TNCs, but rather as TCPs (Transportation Charter-Party Carrier).²⁰ As of August 31, 2023, California’s Department of Motor Vehicles (DMV) has issued approximately 39 AV Testing permits (with a driver), and as of June 8, 2023 authorized the deployment of 4 driverless AV companies.²¹ Although the future of AV passenger service is uncertain, restricting Access Fee Collection to only one type of carrier (TNCs) will limit the funding available for WAV expansion unless the CPUC is authorized to require other transportation carriers to also collect an Access Fee for each trip.

²⁰ See [D.18-05-043](#).

²¹ <https://www.dmv.ca.gov/portal/vehicle-industry-services/autonomous-vehicles/autonomous-vehicle-testing-permit-holders/>

Recommended Next Steps

Implement a Biennial Competitive Process to Select Access Providers

P.U. Code §5440.5(a)(1)(C) provides that “the Commission shall create the TNC Access for All Fund (Access Fund) and deposit monies collected in the Access Fund. The CPUC shall distribute funds in the Access Fund on a competitive basis to Access Providers that establish on-demand transportation programs or partnerships to meet the needs of person with disabilities, including wheelchair users who need a WAV, in the geographic areas selected.” Further, P.U. Code §5440.5(a)(1)(F) also states that “the Commission shall distribute funds in the Access Fund within 90 days following the end of each year. If no Access Provider meets the requirements, funds shall remain in the Access Fund and be distributed the next year.”

Requiring an annual competitive process has been challenging for many of the LAFAs as it requires multiple departments within an agency (i.e., project management staff, public relations, marketing, and IT) to launch a successful competitive solicitation. Prospective LAFAs must often pursue Budget Amendments, which is time and resource consuming. This process often requires prospective LAFAs to make changes to their budget internally, create a report and accompanying materials for the Board, go to their Transportation Committee for recommendation, and go to their Board of Directors²² for approval of the amendment, accepting the additional CPUC funding, and authorizing their CEO to enter into another grant agreement with the CPUC. In addition, given the required investment to launch a successful competitive solicitation, the amount available to potential Access Providers (the benefit) should be significant enough to justify the cost.

Given the concerns the LAFAs have raised, CPED recommends the flexibility of allowing a biennial call for projects (once every two years). This will provide the LAFAs:

1. Sufficient time to develop Calls for Projects;
2. Time to analyze and synthesize data between Calls for Projects to inform program development and ongoing improvement;
3. Ability to more easily combine multiple years of funding without local budget amendments, especially given the volatility of funding from year to year;
4. More funding for the Access Providers, which would have a bigger impact on end users; and
5. Sufficient community input and feedback process to fully inform Calls for Projects.

Overall, providing Access Fund Administrators the flexibility to develop Calls for Projects on a biennial cycle will not only address resource constraints, but also could increase LAFA and Access Provider participation.

²² Board of Directors may be made up of elected mayors, councilmembers, and county supervisors that are appointed from each of the region’s 19 local governments.

Ensure WAV Service Requirements Evolve with New Technologies

Technology is evolving rapidly. Although we can't predict what the future of transportation will look like, new technologies like AVs are rapidly changing the personal and public transportation landscape. The Access for All Program is currently limited to TNCs. As new transportation service technologies emerge and transportation options expand it is important that accessible options expand as well. In order to further the purpose of the statute, the Legislature may wish to consider extending WAV service requirements to new and emerging on-demand transportation services that the CPUC regulates, such as AVs.

Reauthorize Senate Bill 1376 – The TNC Access for All Act

The Access for All Program supports the expansion of critical on-demand WAV service. Without it, thousands of customers could lose access or suffer from more limited access. Either of these outcomes would drastically reduce the ability for these users to engage in the basic freedom of movement that able-bodied Californians enjoy. The existing Program sunsets in 2026; the additional barriers to mobility that would be created by the end of the Access for All Program could limit affordable access to jobs, healthcare, education, and recreation for wheelchair users and their families. The end of Access for All would create a burden that would fall on more than just people who rely on wheelchairs, but also on their families, their friends, and the communities they are vital and vibrant members of. This is clear from the words of those people, their friends, their family, and others who are touched by their presence in the broader community (please see Appendix F). The Legislature may wish to consider extending the Program beyond 2026.

Appendices

Appendix A – Offset Requirements

Criteria	Must Demonstrate
<p>1. Presence and availability of WAVs</p>	<p>(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</p>
<p>2. Improved level of service</p>	<p>Both the Offset Time and the Trip Completion Standards are satisfied:</p> <p>(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.</p> <p>(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.</p>
<p>3. Efforts to publicize and promote available WAV services</p>	<p>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</p>
<p>4. Full accounting of funds expended</p>	<p>Qualifying offset expenses are:</p> <p>(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.</p>
<p>5. Training and inspections</p>	<p>(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</p>
<p>6. Reporting complaints</p>	<p>(a) number of complaints related to WAV drivers or services – by quarter and geographic area, and broken out by category</p>

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 24: Quarterly Exemption Response Times by TNC and County (Level 2 Benchmark Standard: Q3 2019 - Q1 2022)

TNC	County	Response Time Benchmark (Level 2)	Level 2 Benchmark Standard										
			Q3 2019	Q4 2019	Q1 2020	Q2 2020	Q3 2020	Q4 2020	Q1 2021	Q2 2021	Q3 2021	Q4 2021	Q1 2022
LYFT	LOS ANGELES	20	42	42	42	34	33	32	32		35	35	32
	SAN FRANCISCO	16	30	22	22	20	16	18	20	19	19		17
NOMAD	LOS ANGELES	20	19	22	19								
	SANTA CLARA	20		24									
	YOLO	24	33										
UBER	SAN FRANCISCO	16	23	23	23	22			0	17	18	19	20
	SAN DIEGO	20	12		12								
	SANTA CLARA	20	22	23	22	20			2	27	30		28
	SAN MATEO	20	23	22	23	23	24		2	20	21	21	23
	VENTURA	40	24	4	24		4		0				21
	SAN JOAQUIN	40	6	18	6	24					11		
	SACRAMENTO	24	27	40	27				8				
	RIVERSIDE	40	2	14	2	14	5	4					
	ORANGE	24	16	16	16	15	14	17				15	
	NAPA	24	13		13					29			
	MARIN	40	24	19	24	26			4	25		33	
	LOS ANGELES	20	19	13	19	21		25				34	33
	CONTRA COSTA	40	23	23	23	22	25			25		26	29
	ALAMEDA	20	22	21	22	21		30	3	24	27	23	25
	SOLANO	30		20					0	29	17		20
	MONTEREY	30		21									
	KERN	30				11							
	STANISLAUS	40				21			0	23			
	SANTA CRUZ	30							4				
	MERCED	50								25			
SONOMA	40									2			

Table 25: Quarterly Exemption Response Times by TNC and County (Level 1 Benchmark Standard: Q2 2022 - Present)

TNC	County	Response Time Benchmark (Level 1)	Level 1 Benchmark Standard				
			Q2 2022	Q3 2022	Q4 2022	Q1 2023	Q2 2023
LYFT	LOS ANGELES	10	32	32	33	30	29
	SAN FRANCISCO	8	18	17	17	18	18
UBER	SAN FRANCISCO	8		21			18
	SAN MATEO	10	25		20		21
	LOS ANGELES	10					27
	ALAMEDA	10	23				
	SOLANO	15			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
Modoc CTC	RTPA	Modoc

Entity Name	Entity Type	Geographic Areas Covered
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

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	73,424	4%	1,570,372	5%
Alpine	91	<1%	1,243	7%
Amador	3,204	<1%	35,072	9%
Butte	16,549	<1%	203,818	8%
Calaveras	5,116	<1%	42,991	12%
Colusa	1,430	<1%	20,101	7%
Contra Costa	60,392	3%	1,092,401	6%
Del Norte	2,699	<1%	23,421	12%
El Dorado	10,344	<1%	180,666	6%
Fresno	63,938	3%	916,202	7%
Glenn	1,981	<1%	26,309	8%
Humboldt	10,912	<1%	129,162	8%
Imperial	13,389	<1%	156,081	9%
Inyo	1,685	<1%	17,681	10%
Kern	51,175	2%	809,552	6%
Kings	8,225	<1%	123,162	7%
Lake	7,134	<1%	63,156	11%
Lassen	2,284	<1%	21,623	11%
Los Angeles	534,417	26%	9,378,427	6%
Madera	9,474	<1%	136,958	7%
Marin	10,741	<1%	246,714	4%
Mariposa	1,703	<1%	16,356	10%
Mendocino	7,976	<1%	85,578	9%
Merced	18,310	<1%	255,335	7%
Modoc	1,003	<1%	8,060	12%
Mono	390	<1%	12,345	3%
Monterey	17,479	<1%	393,057	4%
Napa	8,040	<1%	130,549	6%
Nevada	6,169	<1%	96,809	6%
Orange	134,170	6%	2,984,409	4%
Placer	19,389	<1%	376,860	5%
Plumas	1,778	<1%	18,628	10%
Riverside	140,624	7%	2,235,038	6%
Sacramento	92,366	4%	1,458,280	6%

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
San Benito	2,848	<1%	59,066	5%
San Bernardino	120,571	6%	1,975,154	6%
San Diego	155,795	7%	2,989,719	5%
San Francisco	44,099	2%	823,732	5%
San Joaquin	48,868	2%	707,255	7%
San Luis Obispo	14,266	<1%	263,694	5%
San Mateo	29,779	1%	717,105	4%
Santa Barbara	21,183	1%	412,737	5%
Santa Clara	78,570	4%	1,810,894	4%
Santa Cruz	12,401	<1%	257,785	5%
Shasta	16,634	<1%	170,010	10%
Sierra	271	<1%	2,949	9%
Siskiyou	3,816	<1%	41,773	9%
Solano	26,651	1%	411,652	6%
Sonoma	25,876	1%	464,836	6%
Stanislaus	34,939	2%	509,181	7%
Sutter	6,450	<1%	91,154	7%
Tehama	5,565	<1%	61,007	9%
Trinity	1,833	<1%	15,034	12%
Tulare	26,598	1%	430,177	6%
Tuolumne	4,817	<1%	49,722	10%
Ventura	44,984	2%	789,982	6%
Yolo	9,608	<1%	203,766	5%
Yuba	5,857	<1%	71,589	8%
California Overall	2,080,280	100%	36,596,389	6%

Appendix F – Customer Feedback & Comments

In January 2022, the CPUC received letters from the public, all petitioning to maintain the Access for All Program in San Francisco. These letters speak to users’ own experiences, and the experiences of family members, friends, teachers, healthcare providers, and more. To provide narrative context on how the Program has helped Californians, below are the anonymized letters received.

- I am a San Francisco resident and I am writing to advocate for keeping Uber and Lyft wheelchair accessible vehicles in SF. This is especially needed now, because families need safer methods of transportation than MUNI and also more convenience for those whom mobility is already more challenging. Imagine not having a car, and having a wheelchair bound, immune compromised daughter who needs to be driven to a routine physical therapy session. Ride shares like Uber and Lyft are the best option because they have the least exposure risk and can offer more convenience for families who already have to handle more logistical complexity.
- I support requiring Uber and Lyft to maintain wheelchair accessible vehicles as part of its fleet.
- I am a special education teacher and work with children with disabilities. Some of my students are wheelchair bound and have many health conditions that require frequent trips to the doctor. By having accessible cars with Lyft and Uber, my students families are able to bring them to their appointments. This also opens opportunities for my students to travel different places in the city. The public buses are unreliable and unsafe due to Covid. Please continue to have Lyft and Uber provide accessible vehicles.
- San Francisco desperately needs wheelchair accessible ride hail services for it’s citizens. I support requiring UBER and LYFT to maintain wheelchair accessible vehicles as part of it’s fleet in San Francisco.
- As a nurse practitioner caring for a population of seniors and people with disabilities it is crucial to continue wheelchair ride services. As the aunt of a child who is wheelchair-bound it is an absolute necessity. Please do not cut them/us off from the World.
- I work with disabled individuals, both kids and adults. San Francisco Bay Area has always had a shortage of accessible rides for people that need them. For non-ambulatory people that live in the East Bay, it might take 2 separate trains and a bus to get to a physicians appointment. Insurance and hospital systems rarely cover transportation support causing an undue burden on disabled individuals. Having access to accessible and reliable rides is important to receiving quality health care and maintaining independence.
- I am writing to urge your support to keep Lyft and Uber wheelchair accessible vehicles in San Francisco. Access to transportation is key to keeping many friends and their families engaged in our city. That engagement benefits us all personally, culturally, and financially. Finally, any service that uses and profits from public infrastructure and monies actually cannot discriminate against people with disabilities, full stop. They can't discriminate against anyone. We've actually passed laws that make this excessively clear. One wonders why this is even a discussion. Some people use wheelchairs. They must have equal access to the services that a company provides.

- I'm a frequent visitor to SF for work and to see family. It is important that we all continue to make all services more accessible and more equitable for all our citizens. Lyft and Uber should be required to keep wheel chair vehicles in San Francisco.
- Please make sure to keep accessible Uber and lyft for disabled people. I am a 56 year old with multiple sclerosis who is wheelchair bound. There is not many taxis that provide this service. I can get stranded when I am out at night with nobody to pick me up. I often can't go to events because there are no services with wheelchair access. Please allow me to have a life outside of home.
- I support keeping Uber and Lyft wheelchair accessible vehicles in SF - - we need options and accessibility for those with disabilities who live and visit our city.
- I would like to advocate to keep Uber and Lyft wheelchair accessible vehicles in SF. It is important to provide access to those who need it. In a city that wants less personal cars, this is an important service to preserve.
- Keeping Uber and Lyfts wheelchair accessible are very important to our community. We are a family of five. Our 15 year old son uses a wheelchair. It has been very important to have wheelchair accessible Uber's and Lyfts for him to be able to access the community. Well I can only speak for ourselves, I can tell you there are countless classmates he's had over the years who I know also depend on them.
- Regardless of Uber & Lyft vehicle policies in general, please keep Uber & Lyft Wheelchair accessible vehicles in San Francisco. Their services are invaluable and irreplaceable.
- I'm writing to urge the leaders of the San Francisco CA Public Utilities Commission to continue to support those community members that require wheelchair accessible transportation. My sister, Thu Phan, was in a wheelchair since birth. I witnessed first hand the hardship she had dealing with mass transit, buses and paratransit. Often times, the disabled endure long waits, broken wheelchair lyfts and it's a absolute heartbreak to know they have to spend hours to get from point A to point B. There is no alternative mode of transportation in some cases. Please continue to require Uber and Lyft mandates to provide accessible transportation for all. This is our civic duty to provide equal and fair access to provide assistance to those most in need.
- I'm writing to you in support of keeping Uber and Lyft wheelchair accessible vehicles in SF is really needed now, especially for those who don't have great access. This service is especially critical in a city where residents often rely on public transportation and ride hail companies like Lyft and Uber on a daily basis. Folks in wheelchairs often have it tough enough getting around and out in the community, let's make it a little easier for them by ensuring they have the same opportunity the rest of us have of just calling an Uber or Lyft as we like.
- I'd like to request that you please keep the options for wheelchair accessible Lyft and Uber in San Francisco. There are families who have a vital need for this service.
- I've lived in San Francisco for over 20 years and have a young daughter who has needed a wheelchair since she was old enough to walk. When she was younger and smaller, it was easy enough for us to lift her in and out of a carseat and collapse her adaptive stroller in our car to get her around. Of course, as she's grown, she's required an adult-size, heavy wheelchair

that we can't collapse, nor can we lift her. I tell you all this to explain why it's difficult for my family to take my daughter anywhere in a car that isn't wheelchair accessible. We've only become aware of Lyft and Uber's wheelchair accessible vehicles in the past year. Where have they been hiding them? I'm serious. I only learned of them because of my advocacy work in the disability community. I hope Uber and Lyft aren't gauging demand for WAVs based on the past few years like I've heard from their drivers because: 1. The pandemic has kept a lot of folks, especially disabled people like my daughter, home. And, 2. Has Uber or Lyft advertised these wheelchair accessible vehicles? How has the community at-large been alerted to this option? Again, from what I understand, the option to order a WAV/ Access vehicle has been around for several years??? WHO KNEW? Since learning of the availability of Uber and Lyft's wheelchair accessible vehicles, we've used Lyft most often because its drivers seem to be more available. We almost exclusively use Lyft now. The drivers are lovely and we always give them a BIG tip because we are so grateful and they are always so lovely to my daughter. The experience has been wonderful! THANK YOU! It's also been easy enough to use once you realize you have to go to your settings to activate the accessible vehicle option - that's annoying and not intuitive, but once done, you're good! I can't express the extent to which having these TNC wheelchair accessible vehicles has improved the quality of life for my daughter. She is able to get out more often and more safely into the community. We can be just like other families now and call a Lyft for the entire family when we need a ride. We are not dependent on having an expensive and large van of our own; these vans are especially hard to own and park in a city like San Francisco. Moreover, even with state help to purchase a wheelchair accessible van of our own, it's still expensive as the state only covers the cost of the wheelchair adaptation to the van. Don't get me wrong, we're grateful for any help with the cost of these vans but truth be told, we'd rather NOT have to own one if we can reliably call an Uber or Lyft. Besides, lots of families can't afford even their share of the adapted vehicle. I've taken the bus with my daughter and am grateful that public transportation is wheelchair accessible. I am grateful most buildings are wheelchair accessible. Let's make certain that more modern transportation methods like Uber and Lyft - ways of getting around these days that have become largely the norm in societies around the world - let's make sure TNCs remain accessible to EVERYONE.

- I am writing to thank you for making sure that Uber and Lyft have wheelchair accessible vehicles, and to implore you to PLEASE keep Uber and Lyft wheelchair accessible vehicles in SF. This service has been invaluable to many of my dear friends and family in maintaining the ability to move around the city as necessary.
- Getting around in San Francisco is challenging even for those of us without mobility impairments. Lyft and Uber wheelchair accessible rides offer an alternative for families and wheelchair-bound individuals who need to get around the city to medical appointments, to shop, and live in a city where cars are difficult to own.
- A dear loved one who is a powerchair user was visiting from Colorado and we were in San Francisco on a very cold night earlier this month. Thankfully, we were able to call a Lyft Access back home to Oakland. It was an incredible relief to be able to access a fully accessible van to take us home. My friend reminded me that there is nothing like this in Colorado and how San Francisco having this is a model for other places. Later during that

same week, we were hoping to take a Lyft Access from Oakland, but they are only accessible in San Francisco. We would love for continued investment and strengthening of Lyft Access and other similar programs, including expanding to the East Bay.

- I'm a constituent from 94122, writing in support of keeping Uber and Lyft wheelchair accessible vehicles in SF. We need it now more than ever! Please keep this invaluable resource so that our community has access to rideshare services!
- I'm writing in support of requiring Uber + Lyft to maintain an adequate fleet of wheelchair-accessible vehicles. My immediate family does NOT have a person in a wheelchair, but my grandmother uses one, and when I've tried to take her places, it's so difficult to go anywhere that isn't well-served by public transit, because we really don't know when or if we can get a ride. There aren't really other options for certain trips, and disabled people deserve mobility. Not everyone can drive or maintain a car that can be made wheelchair-accessible for their family members. We are all one illness or accident away from being in a wheelchair, and I just think it's vital for us to support access for people who use one.
- I am writing to express my strong support for maintaining wheelchair accessibility in rideshare vehicles in San Francisco. This service is critical to families in need, who are already struggling with a dearth of workable transit options in the city. I encourage you to continue to protect these families.
- I'm a wheelchair user residing in Oakland, CA. I've had many good experiences with Uber WAV in the current iteration of that program - during daytime hours, I can usually get a vehicle, which was often not the case before, and I have used this for both short-distance and cross-bay trips. I still suspect wait time for me is longer than for my non-disabled peers - simply based on seeing non-WAV vehicle wait times lower than WAV wait times, and experiences with those wait times being underestimates compared with actual arrival times. I believe those are not being measured and reported to CPUC? In which case, that seems like an area in need of improvement. I also wanted to note a lack of transparency in availability of WAVs, and the impact that has on riders. As I understand it, Uber operates WAV vehicles only during certain hours of the day, but these times are not public knowledge. A few days ago, I arrived at SFO and unfortunately was too late to take BART home. My next option was Uber - but I could not select Uber WAV in the app. It is not clear to me whether this was a result of geofencing (can Uber WAVs pick up at SFO, like non-WAV Ubers?) or time of day. Seeing non-WAV Ubers available at SFO while being unable even to request a WAV seems like the kind of disparate access SB1376 seeks to address.
- Hello I am writing to let you know that we find it extremely important to support of keeping Uber and Lyft wheelchair accessible vehicles in Uber/Lyft . I have people who live in San Francisco that rely on this transportation as a means to get to treatment and physical therapy. Please know that we strongly support the need of San Francisco accessibility for all.
- Please strongly consider keeping wheelchair accessible vehicles for Uber and Lyft. Many families depend on these rides for their disabled children and to not have access for their wheelchairs would be highly limiting and have longstanding consequences on their therapies, outings etc.

- I am writing to request support for keeping Uber and Lyft wheelchair accessible vehicles in SF. We have many citizens in our city who depend on these resources. Please make these available to them.
- These services are helping to provide equity for disabled people and families. Access to this type of transportation allows those with certain physical disabilities a convenient way to travel to healthcare appointments and myriad destinations otherwise inaccessible via public transport. These types of ride share services should continue to be available to San Franciscans.
- Uber WAV and Lyft Access have been an indispensable service for our family. My 11-year old daughter is severely disabled and wheelchair bound. Prior to Uber and Lyft we accessed the buses, walked or used our own car to get anywhere in San Francisco. However, with the dangers of Covid we no longer take the bus. Our daughter now weighs 80 pounds and her wheelchair weighs 100 pounds making the car a backbreaking effort. Now, we are able to call Uber and Lyft for my daughter's numerous doctors appointments across San Francisco. But where Uber and Lyft literally became life-saving services were the four times in 2021 that they took our daughter to the emergency rooms at UCSF and CPMC. We have the option to purchase our own accessible van with a subsidy from the government but we would still have to pay \$40,000 for our share. The \$20 one-way fares with Lyft and Uber is a considerable savings. The able-bodied have access to Lyft/Uber so why wouldn't the most vulnerable population have equal access?
- As a resident of San Francisco and parent of a child with mobility issues I want to make my voice heard about how important it is to have Lyft and Uber to continue to offer wheelchair accessible vehicles.
- We need them and are so grateful to have them. It is so helpful.
- Please ensure individuals living with disabilities have access to Uber and Lyft among other types of ride share services now and in the future.
- I really like this pilot program, it is giving people with disabilities (wheelchair users) more opportunities for independence. Good job.
- I was so overwhelmed wondering how I was going to get my mom to Dr appt I'm extremely grateful and satisfied.
- So wonderful! I was nervous about using the accessible lyft ride for the first time but [driver] was wonderful! Sweet, kind, patient and understanding. I also felt more than safe entering and exiting the vehicle ramp (backwards!). I highly recommend this driver and the lyft accessible service.
- [Driver] is very courteous, pleasant and helpful. It was our FIRST time using Lyft and with Access capability!!
- Very personable and understanding. Made my Mom, who is in a wheelchair feel comfortable and human, especially during these scary times increasing her fear to go out. Much appreciated
- [Driver] was a lifesaver. We couldn't find a cab with a wide enough wheelchair ramp for our wheelchair.

- [Driver's] kindness and care during my first ever outing in my wheelchair was greatly appreciated
- [Driver] was really careful putting my daughter, who's in a wheelchair, in the van. And he drove very safely. My family has lived in San Francisco for over 20 years.... I can't express how much joy it gives us to be able to call a Lyft when we're with my daughter. We just found out about Lyft's WAV program - it has changed our lives knowing we can travel more easily with our daughter in the city. She can get out into the community more with us! THANK YOU, Lyft, from the bottom of our hearts.
- Consistent, reliable transportation does more than simply move an individual from point A to point B. It has the potential to open up realms of opportunity and independence for individuals and whole communities.
- Lyft Wheelchair Accessible Vehicle (WAV) service in Los Angeles County and San Francisco has done just that. It has expanded transportation options for many disabled people, including my brother and I. Since its pilot launch in July of 2019, my brother and I have made use of the service nearly two dozen times - from medical appointments, to work travel and even for leisure, like going to the movies. The service has truly given us increased independence. I myself drive my own vehicle, a modified, fully automated van, and my brother is a full-time paratransit user; but having the added availability of on-demand rideshare service like Lyft WAV has given both of us so much more flexibility. I'm ineligible for paratransit service, but through the Lyft WAV pilot, I have a same-day service at my disposal should I choose not to drive in L.A. traffic or have to commute to areas like Downtown L.A. where parking is a real headache. Lyft's dedicated and attentive WAV Team has made all the difference as this program continues to improve and grow. As an advocate for the disability community, working with rideshare companies hasn't always come easy, but Lyft has continuously engaged with organizations such as SCRS-IL, a Center for Independent Living in L.A. I'm also excited to see Lyft is partnering with Bay Area organizations, such as Self Help for the Elderly, for their WAV Pilot in San Francisco County. Lyft continues to demonstrate their commitment to equity, and have proven to me firsthand that they are "always looking at ways to expand transportation opportunities to the communities that need it most." For my brother and I, and so many others, we look forward to continued engagement with Lyft to inform the best possible WAV service for the community.