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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on
Regulations Relating to Passenger Carriers,
Ridesharing, and New Online-Enabled
Transportation Services.

Rulemaking 12-12-011
(Filed December 20, 2012)

**RULING OF ASSIGNED ADMINISTRATIVE LAW JUDGE ORDERING
RASIER-CA, LLC TO APPEAR FOR HEARING AND TO SHOW CAUSE WHY
IT SHOULD NOT BE FOUND IN CONTEMPT, WHY PENALTIES SHOULD
NOT BE IMPOSED, AND WHY RASIER-CA, LLC'S LICENSE TO OPERATE
SHOULD NOT BE REVOKED OR SUSPENDED FOR FAILURE TO COMPLY
WITH COMMISISON DECISION 13-09-045**

Summary

This Ruling orders Rasier-CA, LLC (UberX or Respondent) to appear for an Order to Show Cause Evidentiary Hearing (OSC hearing) and to show cause, if any, why Respondent should not be found in contempt of Decision 13-09-045 (Decision or D.13-09-045), fined and penalized, including suspension or revocation of its license to operate from this Commission, for failing to comply with D.13-09-045. The specific allegations that Respondent must address at the upcoming OSC hearing are discussed below.

The authorities that Respondent is ordered to address are Rule 1.1 of the Commission's Rules of Practice and Procedure, as well as Pub. Util. Code §§ 701, 2107, 2108, 2113, 5411, 5415, 5378(a) and 5381.

1. Background

On September 19, 2013, the Commission, in D.13-09-045 created a new category of charter party carrier (TCP) of passengers called Transportation Network Companies (TNCs). The Decision set forth the various requirements that TNCs must comply with in order to operate in California. Among other regulatory requirements, the Decision required TNCs to submit annual reports containing certain information. Specifically, the Decision states that:

- One year from the effective date of these rules and annually thereafter, each TNC shall submit to the Safety and Enforcement Division a report detailing the number and percentage of their customers who requested accessible vehicles, and how often the TNC was able to comply with requests for accessible vehicles.¹
- One year from the effective date of these rules and annually thereafter, each TNC shall submit to the Safety and Enforcement Division a verified report detailing the number of rides requested and accepted by TNC drivers within each zip code where the TNC operates; and the number of rides that were requested but not accepted by TNC drivers within each zip code where the TNC operates. The verified report provided by TNCs must contain the above ride information in electronic Excel or other spreadsheet format with information, separated by columns, of the date, time, and zip code of each request and the concomitant date, time, and zip code of each ride that was subsequently accepted or not accepted. In addition, for each ride that was requested and accepted, the information must also contain a column that displays the zip code of where the ride began, a column where the ride ended, the miles travelled, and the amount paid/donated. Also, each report must contain information aggregated by zip code and by total California of the number of rides requested and

¹ D.13-09-045 at 30-31.

accepted by TNC drivers within each zip code where the TNC operates and the number of rides that were requested but not accepted by TNC drivers.²

- One year from the effective date of these rules and annually thereafter, each TNC shall submit to the Safety and Enforcement Division a verified report in electronic Excel or other spreadsheet format detailing the number of drivers that were found to have committed a violation and/or suspended, including a list of zero tolerance complaints and the outcome of the investigation into those complaints. Each TNC shall also provide a verified report, in electronic Excel or other spreadsheet format, of each accident or other incident that involved a TNC driver and was reported to the TNC, the cause of the incident, and the amount paid, if any, for compensation to any party in each incident. The verified report will contain information of the date of the incident, the time of the incident, and the amount that was paid by the driver's insurance, the TNC's insurance, or any other source. Also, the report will provide the total number of incidents during the year.³
- One year from the effective date of these rules and annually thereafter, each TNC shall submit to the Safety and Enforcement Division a verified report detailing the average and mean number of hours and miles each TNC driver spent driving for the TNC.⁴
- TNCs shall establish a driver training program to ensure that all drivers are safely operating the vehicle prior to the driver being able to offer service. This program must be filed with the Commission within 45 days of the adoption of this decision. TNCs must report to the Commission on an annual

² *Id.* at 31-32.

³ *Id.* at 32.

⁴ *Id.* at pp. 32-33.

basis the number of drivers that became eligible and completed the course.⁵

Respondent operates the transportation application commonly known as UberX. D.13-09-045 found that UberX was a charter party carrier of passengers, thus subjecting Respondent to the Commission's jurisdiction. On April 7, 2014, the Commission issued Respondent's TNC Permit. Prior to this time, the respondent was operating under an interim agreement with the Safety and Enforcement Division (SED), while Rulemaking 12-12-011 progressed.

2. Respondent Failed to Submit All of The Information Ordered in Decision 13-09-045.

On September 19, 2014, Respondent submitted annual report information to SED. SED reviewed the information submitted by Respondent and found that Respondent had failed to provide all of the information specified in the Decision.

Specifically, Respondent failed to provide the following:

1. The number and percentage of customers who requested accessible vehicles;
2. How often the TNC was able to comply with requests for accessible vehicles;
3. The number of rides requested and accepted by TNC drivers within each zip code where the TNC operates;
4. The number of rides that were requested but not accepted by TNC drivers within each zip code where the TNC operates;
5. The date, time, and zip code of each ride request;
6. The concomitant date, time, and zip code of each ride that was subsequently accepted or not accepted;

⁵ *Id.* at 27 (*emphasis added*).

7. Columns that displays the zip code of where each ride that was requested and accepted began, ended, the miles travelled, and the amount paid/donated;
8. Information aggregated by zip code and a statewide total of the number of rides requested and accepted by TNC drivers within each zip code where the TNC operates and the number of rides that were requested but not accepted by TNC drivers;
9. For the report on issues with drivers, the cause of each incident reported;
10. For each incident reported, the insurance amount paid, if any, by any party other than the TNC's insurance.⁶

Since September 19, 2014, SED has worked to obtain complete information as required by the Commission's Decision through the issuance of additional data requests. As discussed in SED's Staff Report attached herein, SED has issued additional data requests to Respondent seeking a complete response to annual reporting requirements. As of the date of this Ruling, SED has not received all of the information ordered by D.13-09-045.⁷

3. Fines, Penalties, and Contempt

Pub. Util. Code § 2107 provides for a penalty of not less than five hundred dollars and not more than fifty thousand dollars for a utility's failure or neglect to comply with "any part or provision of any order, decision, decree, rule, direction, demand, or requirement of the [C]ommission." Pub. Util. Code § 2108 provides that every violation of any order, decision, decree, rule, direction, demand or requirement of the Commission "is a separate and distinct offense,

⁶ See SED Staff Report at 4-5.

⁷ SED Staff Report at 3-4.

and in case of a continuing violation each day's continuance thereof shall be a separate and distinct offense."

Pub. Util. Code § 5411 provides that a TCP that "fails to obey, observe, or comply with any order, decision, rule, regulation, direction, demand, or requirement of the [C]ommission" is guilty of a misdemeanor and is punishable by a fine of not less than one thousand dollars and not more than five thousand dollars for every violation or failure to comply with any order or decision of the Commission. Every violation of Pub. Util. Code § 5411 et seq. "is a separate and distinct offense, and in case of a continuing violation each day's continuance thereof is a separate and distinct offense." (Pub. Util. Code § 5415.)

Pub. Util. Code § 2113 states that a utility, corporation, or person which fails to comply with any part of any order, decision, rule, regulation, direction, demand, or requirement of the Commission or any Commissioner is "in contempt of the [C]ommission," and may be punished by the Commission "in the same manner and to the same extent as contempt is punished by courts of record."

In addition, pursuant to Rule 1.1 of the Commission's Rules of Practice and Procedure, any person who transacts business with the Commission may never "mislead the Commission or its staff by an artifice or false statement of fact or law." A person who violates Rule 1.1 may be sanctioned in accordance with Pub. Util. Code § 2107.

Moreover, in addition to imposing monetary fines, penalties, and holding a utility in contempt, the Commission can do all things necessary and convenient in the exercise of its power and jurisdiction. (Pub. Util. Code § 701; Pub. Util. Code § 5381.) Accordingly, penalties may also include additional requirements for Respondent to immediately rectify its violations by requiring it to

immediately turn over all requested information to SED, or any other measures the Commission deems necessary. Finally, the Commission is empowered by law to permanently revoke the Respondent's permit. Pub. Util. Code § 5378(a) provides that the Commission may "cancel, revoke, or suspend any operating permit or certificate" issued to any charter party carrier, including Respondent, for any violation of any order, decision, rule, or requirement of the Commission.

In sum, the Commission may impose, fines, penalties, hold Respondent in contempt, and/or impose any other punishments consistent with the foregoing Public Utilities Code Sections and Rule 1.1 if found to be supported by the evidence at the OSC hearing.

4. Ex Parte Prohibition

As provided in Rule 1.3(a) and 8.2(b) of the Commission's Rules of Practice and Procedure, and as set forth in the Assigned Commissioner's Ruling of November 7, 2014, the OSC portion of this proceeding, including the OSC hearing, is categorized as adjudicatory and *ex parte* communications are prohibited. The determination as to category is appealable pursuant to Rule 7.6 of the Commission's Rules of Practice and Procedure.

IT IS RULED that:

1. Respondent is ordered to appear at an Order to Show Cause (OSC) hearing to be scheduled as described below, and there to show cause why the Commission should not adjudge Respondent in contempt of the Commission, for failing to comply with the Commission's orders in Decision (D.) 13-09-045 and for violating the specific requirements set forth in D.13-09-045.

2. Respondent shall appear and show cause why it should not be fined or otherwise penalized, or have its license to operate revoked or suspended, at the following evidentiary hearing:

December 11, 2014, 9:30 a.m.
Commission Hearing Room
505 Van Ness Avenue
San Francisco, CA 94102

3. A quorum of the Commission may attend the hearing.
4. At the hearing, Respondent shall cause to appear a senior executive capable of addressing all of the alleged violations in this Ruling and in the accompanying Safety and Enforcement Division (SED) Staff Report, as well as any other officers, employees, or agents necessary to explain and address all of the above allegations. Such witnesses shall be placed under oath and subject to cross-examination. Respondent may provide other competent witnesses to provide relevant testimony.
5. No later than December 4, 2014, UberX shall file and serve a verified statement responding to the allegations contained in this Ruling and in the accompanying SED Staff Report.
6. No later than December 9, 2014, SED shall file and serve a verified reply statement in response to UberX's December 4, 2014 statement.
7. This Ruling constitutes the Notice of Opportunity to Be Heard pursuant to Pub. Util. Code §§ 2113 and 5378(a)(2). Respondent is ordered to address
8. Rule 1.1 of the Commission's Rules of Practice and Procedure, as well as Pub. Util. Code §§ 701, 2107, 2108, 2113, 5411, 5415, 5378(a), and 5381. Respondent must appear at the hearing. Should Respondent fail to appear, the allegations in this Ruling and the accompanying SED Staff Report will be deemed admitted although the assigned Administrative Law Judge may allow additional evidence or information.
9. Respondent and any agent, representative, employee, consultant, or other individual or person acting on behalf of the respondent must cease and desist

from any and all violations of and comply with all Commission orders, rules or regulations, and any pertinent Public Utilities Code statute, including the requirement that respondent must obtain the Commission's prior written approval before executing any agreement for the sale, transfer, or encumbrance of any ownership interests of its TNC business.

10. This Order to Show Cause (OSC) portion of the proceeding, including the OSC hearing, is categorized as adjudicatory and *ex parte* contacts are prohibited. The determination as to category is appealable pursuant to Rule 7.6 of the Commission's Rules of Practice and Procedure.

11. This Ruling shall be served on the mailing list for this proceeding. Additionally, the Executive Director will send by certified mail return receipt requested, a copy of this Ruling to the Respondent at the following addresses:

Travis Kalanik, Manager
Rasier-CA, LLC
182 Howard Street, #8
San Francisco, CA 94105

Krishna Juvvadi
Counsel for Uber
Uber Technologies, Inc.
1455 Market Street , 4th Floor
San Francisco, CA 94103

Rasier-CA, LLC
C/O National Registered Agents, Inc.
100 Canal Pointe Blvd Ste. 212
Princeton NJ 08540

12. This Ruling is effective today.

Dated November 14, 2014, at San Francisco, California.

/s/ ROBERT M. MASON

Robert M. Mason
Administrative Law Judge

ATTACHMENT

Safety and Enforcement Division

STAFF REPORT



**REPORT ON THE FAILURE OF
RASIER-CA, LLC.
TO COMPLY WITH
THE REPORTING REQUIREMENTS OF
DECISION (D.) 13-09-045**

**Prepared By The Safety and Enforcement Division
Transportation Enforcement Branch**

October 2014

1. Executive Summary

On September 19, 2013, the California Public Utilities Commission (Commission) adopted rules and regulations for Transportation Network Companies (TNCs) to obtain a permit to operate in California. Among other requirements, the Commission ordered each TNC to submit specific and detailed information to the Safety and Enforcement Division (SED) one year from the effective date of the decision, for a submission deadline of September 19, 2014.¹ SED found significant gaps and omissions in the data submitted by Rasier-CA, LLC (“Rasier”) doing business under the web-enabled app/platform developed by Uber Technologies, Inc. (“Uber”).² Rasier failed to submit to SED the most critical data components required by Decision (D.)13-09-045, a violation of the Commission’s order.

2. TNC Data Reporting Requirements

D.13-09-045 requires each TNC to submit six verified³ reports to SED by September 19, 2014 and annually thereafter. Commission staff developed reporting templates and posted those templates on the Commission's website. The final version became available on February 12, 2014 (Attachment A).⁴

Specifically, D.13-09-045 requires the TNCs to submit the following information:

Report on Providing Accessible Vehicles

- The number and percentage of customers who requested accessible vehicles and how often the TNC complied with such requests.

Report on Providing Service By Zip Code

- Rides requested and accepted by TNC drivers within each zip code where the TNC operates.
- Rides requested but not accepted by TNC drivers within each zip code of operation,
- Date, time and zip code of each request and whether the ride was accepted or not accepted.
- Zip code of where the ride began and ended.
- Amount paid.
- Number of rides requested, accepted and not accepted, aggregated by zip code.

Report on Hours Logged by Drivers and Report on Miles Logged by Drivers

- The average and mean number of hours and miles each TNC driver incurred while driving for the TNC.

¹ R.12-12-011 Decision 13-09-045 Decision Adopting Rules and Regulations to Protect Public Safety While Allowing New Entrants to the Transportation Industry, adopted September 19, 2013, Ordering Paragraph 1, referring to Safety and Regulatory Requirements at pp. 26-33.

² On April 7, 2014, the Commission issued a TNC permit to Rasier-CA, LLC (copy accessible here: <http://www.cpuc.ca.gov/NR/rdonlyres/E3470797-2DCB-463F-B898-E5F2697850BE/0/RaiserCALLCPermit.pdf>). This staff report refers to Uber and Rasier jointly, as Rasier licenses Uber’s technology in order to enable its (Rasier’s) drivers to accept ride requests.

³ D.13-09-045, p.29 “...a signature of a corporate officer of the TNC verifying under penalty of perjury...that the report is accurate and contains no material omissions.”

⁴ <http://www.cpuc.ca.gov/PUC/Enforcement/TNC/TNC+Required+Reports.htm>, accessed October 30, 2014.

Report on Problems with Drivers

- The number of drivers that were found to have committed a violation and/or suspended, including a list of zero tolerance complaints and the outcome of investigation into those complaints.
- Each accident or other incident that involved a TNC driver and was reported to the TNC,
 - The cause of each incident;
 - Date and time of incident/accident;
 - Amount paid, if any, for compensation to any party in each incident;
 - Amount Paid by Driver's Insurance;
 - Amount Paid by TNC's insurance;
 - Amount Paid by any other Source.

Report on Drivers Completing Driver Training Course.

- Number of drivers that became eligible and completed the course by month and year.

3. SED Data Collection Efforts

On September 9, 2014, SED staff sent an email to all TNC representatives to provide a courtesy reminder regarding the September 19, 2014 deadline for submitting reports pursuant to D.13-09-045.

On September 10, 2014, SED staff received an invitation (via email) from the Policy and Planning Division (PPD) to meet with PPD staff and counsel representing Uber/Rasier, scheduled for September 11, 2014.

During the September 11, 2014 meeting, Uber/Rasier's representatives expressed concerns about providing information at the level of detail required by D.13-09-045, citing the sensitivity and market value of data required in the Report on Providing Services by Zip Code. SED advised Uber/Rasier to request confidential treatment for information it considered market-sensitive or proprietary. SED also reminded Uber/Rasier that D.13-09-045 specifically states that the TNCs were instructed to submit the reports confidentially.⁵ Uber/Rasier advocated for a limited data submittal, and offered to provide a heat map and aggregated data in lieu of a detailed submission. SED indicated that a refusal to provide complete data violates the Commission order. Without the underlying data, SED would be unable to verify the accuracy of heat map(s) and aggregated information, or to present meaningful findings to the Commission.

After the meeting, SED staff emailed the Uber/Rasier attendees to confirm that the detailed data specified in D.13-09-045 must be submitted to SED by September 19, 2014. Uber/Rasier's outside counsel replied by email to acknowledge SED staff's message. Those email messages are included with this report as Attachment B.

On September 19, 2014, Uber/Rasier submitted files pursuant to D.13-09-045. After reviewing the submission, SED staff concluded that Uber/Rasier had failed to provide a significant portion of the information required by D.13-09-045.

On October 6, 2014, SED staff informed Uber/Rasier that its September 19, 2014 submission was incomplete, and indicated that Uber/Rasier must provide the required data within four days. On October 7, 2014, an attorney for

⁵ D.13-09-045. Footnote 42.

Uber/Rasier emailed SED staff to acknowledge SED's communication, and stated that Uber/Rasier would not be able to meet the October 10, 2014 deadline.

On October 14, 2014, SED staff attended a meeting arranged by PPD staff with representatives from all the TNCs.⁶ The purpose of the meeting was to discuss the Commission's upcoming En Banc, specifically the TNC Panel and associated presentations. During that meeting, Uber/Rasier attorneys made a verbal commitment to SED staff that Uber/Rasier would submit additional data by October 17, 2014.

On October 17, 2014, SED staff received an email from Uber/Rasier counsel at 6:33 pm, which stated that Rasier shipped a DVD to SED, and to contact him if the DVD did not arrive on Monday morning.

On October 20, 2014, at 12:07 pm, SED staff informed Uber/Rasier counsel that SED had not yet received any DVD from Rasier or Uber. At 12:17 pm, Uber/Rasier responded that it would hand deliver the DVD in about two hours, and asked if that day's Federal Express shipment had arrived. At 1:28 pm, SED staff responded that Federal Express delivered the daily shipment, which did not include any items from Uber/Rasier. At 3:18 pm, SED staff received notice from the Commission's mail room staff that an envelope had been hand delivered to the mailroom. After reviewing these materials, SED staff concluded that Uber/Rasier remains out of compliance with several of the reporting requirements in D.13-09-045.

And finally, Uber/Rasier met with SED staff on October 27, 2014. Uber/Rasier stated that it did not collect certain data required by D.13-09-045, and that it lacked the information technology and trained staff to extract the required data within the specified timeframe. Uber/Rasier also confirmed that it would not provide its Zip Code report at the level of detail required by D.13-09-045, but would be willing to work with SED to get data on the cause of each incident included in its Report on Problems With Drivers, but that this would take longer than the timeframe specified by SED. SED indicated that while the Commission could consider proposals to refine the data metrics in Phase 2, SED could not enable Uber/Rasier to avoid compliance with the current reporting requirements.⁷

4. Uber/Rasier Data Submissions

SED received incomplete data submissions from Uber/Rasier on September 19, 2014 and October 20, 2014, respectively. After reviewing the Uber/Rasier reports, SED staff concluded that Uber/Rasier failed to submit detailed data for the Report on Providing Service by Zip Code, arguably the most substantial of the six reports.⁸ In summary, three of the six required reports lacked one or more required component(s), as follows:

Report on Accessibility:

- The number and percentage of customers who requested accessible vehicles.
- How often the TNC was able to comply with requests for accessible vehicles.⁹

⁶ November 4, 2014 En Banc Agenda - <http://www.cpuc.ca.gov/NR/rdonlyres/A1896AC3-E251-4251-853A-59D010AEDC8F/0/TNCEnBancAgenda101514.pdf>, accessed October 30, 2014.

⁷ SED notes that the reports submitted by Sidecar, Wingz and Summon comply with the reporting requirements specified in D.13-09-045.

⁸ To provide some context, the size of Sidecar's Zip Code report constitutes approximately 89 percent of the total size (measured in kilobytes) of their total submission.

⁹ In its September 19, 2014 submission, which was not marked confidential, Uber/Rasier stated: "In the six months since its TNC permit was issued on April 7, 2014, Rasier has made significant progress towards achieving the goals set forth in the Accessibility Plan. Specifically, Rasier worked with UTI to develop and provide a feature on UTI's software application for

Report on Providing Service by Zip Code:

- Number of rides requested and accepted by TNC drivers within each zip code where the TNC operates.
- Number of rides that were requested but not accepted by TNC drivers within each zip code where the TNC operates.
- Date, time, and zip code of each request.
- Concomitant date, time, and zip code of each ride that was subsequently accepted or not accepted.
- For each ride that was requested and accepted: a column that displays the zip code of where the ride began, a column where the ride ended, the miles travelled, and the amount paid/donated.
- Information aggregated by zip code and a statewide total of the number of rides requested and accepted by TNC drivers within each zip code where the TNC operates and the number of rides that were requested but not accepted by TNC drivers.

Report on Problems With Drivers:

- The cause of each incident.
- Amount paid, if any, by any party other than the TNC's insurance.¹⁰

SED staff also concluded that Uber/Rasier provided complete information on several data components as required by D.13-09-045, which includes:

- Number of drivers that became eligible and completed the driver training course.
- Number of drivers that were found to have committed a violation and/or were suspended, including a list of zero tolerance complaints and the outcome of the investigation into those complaints,
- Information on each accident or other incident that involved a TNC driver and was reported to the TNC, such as:
 - o Date and time of the incident.
 - o Amount paid by the TNC's insurer, if any, to compensate any party in each incident,
 - o Total number of incidents since October 1, 2013.
 - o Average and median number of hours and miles each TNC driver spent driving for the TNC.¹¹

riders to request a wheelchair accessible vehicle. This new feature will be available in October 2014. In addition, Rasier has identified existing partners who can provide wheelchair accessible vehicles, and will continue to work to find new partners with WAVs to be onboarded in the future.”

¹⁰ During the Sep. 11, 2014 meeting, Uber/Rasier's representatives stated that they did not have any information on amounts paid for incidents other than those paid by the TNC's insurance.

5. Discussion

Uber/Rasier had multiple opportunities to raise concerns regarding the reporting requirements, yet failed to notify SED of any concern regarding the reporting requirements. Uber/Rasier did not initiate a discussion with SED staff until September 4, 2014, which is the date Uber/Rasier requested a meeting for the following week, and eight working days before the submission deadline. Even at this point, Uber/Rasier only verbally stated its concerns informally to SED staff.

On October 23, 2013, Uber filed an Application for Rehearing of D.13-09-045. No part of that application raised concerns with the reporting requirements contained in D.13-09-045.¹² Uber did not file a Petition for Modification of D.13-09-045 within the timeframe specified by the Commission's Rules of Practice and Procedure (Rule 16.4). And finally, Uber did not file a motion for a protective order with the Commission to prevent it from having to submit the reports as required. Templates for the required reports have been available on the Commission's website since, at the latest, February 12, 2014, yet Uber/Rasier did not raise concerns regarding the submission until approximately one week before the reports were due.¹³

6. Recommendations

SED recommends that the Commission take the following actions:

- Issue an Order to Show Cause to determine why the Commission should not take an enforcement action against Uber, such as financial penalties or revocation of Rasier's Permit to Operate.
- Order Uber/Rasier to submit to SED the detailed data required by D.13-09-045.
- If Uber/Rasier fails to provide sufficient reason for its failure to comply with D.13-09-045 Ordering Paragraph 1, the Commission should assess a civil penalty on Uber/Rasier pursuant to Public Utilities Code §5378(b).

¹¹ During the Sep. 11, 2014 meeting, SED staff and Uber/Rasier representatives agreed that the terms "mean" and "average" represent roughly the same type of data, and that Uber could provide the average and median number of hours and miles each TNC driver spent driving for the TNC.

¹² R.12-12-011 Application of Uber Technologies, Inc. for Rehearing of Decision 13-09-045, filed October 23, 2013, <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M078/K578/78578749.PDF>

¹³ <http://www.cpuc.ca.gov/PUC/Enforcement/TNC/TNC+Required+Reports.htm>, accessed October 15, 2014, states "Last Modified: 2/12/2014".

ATTACHMENT A

DATA SUBMISSION TEMPLATES

Annual Report on Providing Accessible Vehicles

YEAR:						
Month	Total # of Requested Rides (all types)	Number of Hours an Accessible vehicle is available per month	Number of accessible vehicles	Total Number of Customer Requests for Accessible Vehicles	Total Percentage (%) of Customer Requests for Accessible Vehicles	Total Number of fulfilled Accessible Vehicle Requests
January						
Feb						
Mar						
Apr						
May						
June						
Jul						
Aug						
Sep						
Oct						
Nov						
Dec						

**Annual Report on Number of Drivers Completing
Driver Training Course**

YEAR:	
Month	Total Number of Drivers tht Became Eligible and Completed the Course
January	
Feb	
Mar	
Apr	
May	
June	
Jul	
Aug	
Sep	
Oct	
Nov	
Dec	
TOTAL:	0

ATTACHMENT B

EMAILS BETWEEN SED AND UBER/RASIER

[PAGES REDACTED]

ATTACHMENT C
SUMMARY OF UBER/RASIER DATA SUBMISSIONS

[PAGES REDACTED]