



METROPOLITAN
TRANSPORTATION
COMMISSION



Commissioner Liane Randolph
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: R-12-12-011 -- Application of Public Utilities Code §5401 to Ridesharing Features Offered by Transportation Network Companies

Dear Commissioner Randolph:

On August 6, you requested that interested persons comment on whether Public Utilities Code §5401 should be applied to transportation network company ridesharing platforms that allow drivers to carry multiple parties and charge individual fares. The undersigned organizations believe that shared ride services represent an important new innovation in carpooling that in turn offers promise in advancing California environmental and sustainability goals.

We do not support the application of §5401 to preclude shared ride services provided on the platforms of these transportation network companies. The ability of these services to charge fares on an individual fare basis is a critical enabler of pooled rideshares and the benefits they offer.

- Split fare ridesharing allows multiple parties to ride together in a personal vehicle and split the cost, reducing vehicles miles travelled and making rides more affordable.
- These ridesharing models aid California's efforts to promote carpooling and reduce fuel consumption, offering promise in reducing emissions of greenhouse gases and criteria air pollutants.
- These services also help solve the last-mile problem, expanding access to public transit and reducing the need for car ownership.

We encourage the Public Utilities Commission to give the Legislature time to address the question of legal authority for the fare splitting features of Lyft Line and Uber Pool. Rather than make a determination about whether an old statute applies to these new and popular carpooling options, the Commission should allow the Legislature to complete its efforts underway to review and clarify the application of the Public Utilities Code to these services.

If the Commission decides to make a decision, we strongly favor an interpretation that dated restrictions on fare splitting applicable to charter party carriers must not apply to transportation network company innovations like Lyft Line or Uber Pool. Shared rides' social and environmental benefits hinge on the ability of different parties to split the cost of a ride, thus making it more affordable and efficient. We urge the Commission not to stymie this new innovation in transportation.

Thank you for your consideration.



Steve Heminger, Executive Director
Metropolitan Transportation Commission



Timothy J. O'Connor, Senior Attorney &
Director, California Climate Initiative
Environmental Defense Fund



Gabriel Metcalfe, President & CEO
SPUR



Matt Vander Sluis, Program Director
Greenbelt Alliance



Colin Parent, Policy Counsel
Circulate San Diego



Hasan Ikhrata, Executive Director
Southern CA Association of Governments



Sage Sweetwood, Executive Director
Planning and Conservation League
Foundation



Jonathan Parfrey, Executive Director
Climate Resolve



Bill Magavern, Policy Director
Coalition for Clean Air



Daniel Sisson, Vice Chair
SF Transit Riders



Jim Hartnett, Executive Director
Caltrain



Joshua Stark, State Policy Director
TransForm