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April 23, 2018

Commissioner Liane M. Randolph  
California Public Utilities Commission  
505 Van Ness Ave.  
San Francisco, CA 94102

**RE: Sharing of Rides in Autonomous Vehicles – PUC Proposed Decision Authorizing a Pilot Test Program for Autonomous Vehicle Passenger Service**

Dear Commissioner Randolph:

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to express our concern regarding a key element of the PUC's April 6 Proposed Decision Authorizing a Pilot Test Program for Autonomous Vehicle (AV) Passenger Service.

AVs have the potential to save thousands of lives, reduce congestion and negative environmental impacts, provide access to affordable transportation to the elderly, disabled and economically underserved, and reorient the design and function of the cities across the country around its residents not its vehicles.

The potential of AVs to expand ridesharing and reduce the need for car ownership is a critical factor in California's ability to meet its aggressive climate and air quality goals. California is home to three of the five most congested cities in the country and in order to reduce the state's rate of single-occupant vehicle trips, we need to aggressively promote shared rides as the default choice for AV transportation.

The PUC's proposed ban on shared rides during AV testing unfortunately runs counter to this goal and risks undermining an important opportunity to reduce carbon emissions. It is critical that we do everything we can to encourage, not discourage, shared rides.

For all the billions spent on diamond lanes and academic studies showing 95% of trips could be shared, the percentage of commuters choosing to carpool declined for decades. Ridesharing services like Lyft Line that group multiple people in one car are changing that by making carpooling more accessible and convenient than ever. This success should be extended without interruption to AVS.

Ridesharing companies have also introduced a number of new technologies designed to keep riders safe. For example, all rides are tracked via GPS from start to finish and passengers can share their route and ETA with friends and family easily from their smartphones. Passengers also receive a photo of the vehicle's make and color and the license plate number and transactions are handled through the app

with no need to handle or carry cash. These advances to protect consumer safety will continue to help ensure catching a safe ride home is easier than ever before—whether you are ridesharing with a driver or in an AV.

The environmental benefits of AV technology when paired with ridesharing platform are substantial. By 2025, Lyft estimates that its shared platform will provide at least 1 billion rides per year using electric autonomous vehicles and will reduce CO2 emissions for the U.S. transportation sector as a whole by at least 5 million tons per year. These critical advances can only be achieved if Californians continue to increasingly view sharing a ride with someone with a similar destination as the default.

We urge the PUC to remove the ban on shared rides from the proposed decision on AVs to avoid encouraging solo trips and, in turn, missing a critical opportunity to reduce traffic congestion and carbon emissions.

Sincerely,



Colin Parent  
Executive Director and General Counsel  
Circulate San Diego