DCTC is obligated to protect public safety especially when the core service being provided is on public roadways and has potential safety impacts for third party and property. The underlying principal is public safety and regulation must be the safety net that the public relies on for protection.

Ride share services are not providing voluntary or “donation” services. They are “for profit” companies with a core business of providing transportation for compensation and should be regulated as such.

We do not agree with the creation of a third rail of service but if this forced on us we expect these entities to be regulated equally and no less than the taxicab industry.

Taxicab drivers should not be allowed to participate in Ride Share even if this service is equally regulated as the taxicab industry. Removing the firewall that should exist between these two services would result in the unintended deregulation of the taxicab industry and create confusion and chaos to the riding public. The unregulated or unverifiable “off-meter” allowance and cross-pollination of the providers would be significantly exploited to the detriment of the riding public and violate DCTC’s obligation to ensure public safety and consumer protection. The public must be able to rely on public transportation being consistent, affordable priced and somewhat predictable.

The requirement that a PSP or company must integrate with a DDS should be dropped from the already passed regulation especially if the PSP is a dispatch company. This forced integration is very costly and places the burden on the PSP to allow an unwanted competitor into their service domain and easy access to their customers.

Now that taxicabs have installed payment systems we should eliminate regulation that forces PSP and taxicab companies to further invest in or upgrade in-vehicle equipment. Customers are showing growing preferences for obtaining, paying for services and viewing direct marketing using their own mobile devices and the government is preparing regulation to allow taxicab metering to be done by mobile solutions. The limited capital resources of the companies could be better used to create and market more innovative technology and services to be more competitive with these new forces.

Reinstate Shared Ride service for taxicab drivers. The elimination of Shared Ride when taximeters were installed deprived drivers of significant income and impacted service in the underserved areas. It also opened the door for e-hailing applications because more passengers were left waiting or were passed up because drivers were now restricted to one-passenger or group per trip. Shared Ride would give taxicab drivers a monetary incentive to remain in the industry and provide improved service to customers.

Ride Share drivers should have commercial insurance for their vehicle and not the unverifiable and mysterious “blanket” policy provided by the company.

Vehicle Age limit should be at least 10 years for both industries. Vehicles must be subject to DMV inspection before being placed in service.
Taxicab Industry Ownership Group
Ride Share Comments

• Driver age limit should be at least 21 years for both industries. Drivers must show a clean driving record and be subject to the same points system as taxicab drivers

• Drivers must be a resident of and licensed in a city within the COG operating area

• Shift limits for Ride Share drivers should not exceed 4 hours per day or 20 per week. Since these entities claim that the drivers are not full-time operators then part-time hours should be applicable

• Ride Share drivers must undergo the same training, criminal background checks, drug and alcohol policies. The assigned vehicles must follow the same strict licensing and inspection policies as taxicabs

• There should be strong penalties for service and policy violations by both drivers and companies providing ride share service

• Driver and Vehicles should be verified, certified, licensed and regulated by DCTC. No self-regulation or “honor” system as allowed by the initial CPUC regulations

• Ride Share entities must be held accountable for the behavior of their signed drivers and ensure that they are strictly adhering to all regulatory policies and guidelines

• Existing area reciprocity agreement must apply to Ride Share. No allowances should be provided to allow pickups and drop-offs in non-domicile area

• Ride Share should not be allowed to perform advance booking trips. Trips must be requested and completed within a limited timeframe. If they are allowed to do advance trips it would be a direct threat to taxicab dispatch services

• Ride Share vehicle should not be allowed to pick up “street hails” and every vehicle should have internal and external warning decals for the consume viewing that no “street hailing allowed”. The ride share companies should display the “street hail” warning on their website and on the smart phone application

• There should be a consistent pricing and some set minimum pricing which is not below regulated taxicab rates. If their business model is “for profit” they should not be allowed to set non-competitive pricing when they have lower overhead from not being required to maintain a physical infrastructure like a taxicab company

• Surge pricing should not be allowed at any time!! Taxicab industry have regulated pricing and Ride Share pricing should be just as consistent and transparent

• There should be no free marketing giveaways!! The taxicab industry cannot compete because they do not control the drivers earnings

• Ride Share should be equal accessibility to all persons desiring to use this service. The Ride Share companies should be required to demonstrate they serve all areas of the city and just not selected operating areas at certain times of day. Taxicab industry is charged in the Taxi Innovation Act to eventually provide 100% wheelchair accessibility. Providing services to persons with accessibility needs, individuals without smartphone or credit cards should not
be the burden for one industry while the other industry is allowed to build its core business on exclusivity

- Ride Share should be restricted to certain operating areas and not be allowed to occur at points of embarkation or disembarkation like airports, train stations, metro stations or establishments like hotels and conventions centers that have cabs stands with registered taxicab drivers

- The CPUC regulation is a good starting point except for allowing self-governance by the Rider Share entities and not insisting that the vehicles performing ride share obtain commercial insurance versus the highly questionable “blanket” policy provided by the rider share company

- The City of Austin went a bit further and defined “Ride Share” as the travelling of two or more persons by any mode or private passenger vehicle, including but not limited to, carpooling, vanpooling, business pooling to any location incidental to another purpose of the driver for which compensation is neither accepted, collected, encouraged, promoted or requested