

March 29, 2016

Lauren Kucera
Administrative Assistant
City of London
300 Dufferin Avenue
London, Ontario
P.O. BOX 5035
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Dear Ms. Kucera,

**RE: TRANSPORTATION NETWORK COMPANIES / PRIVATE VEHICLES FOR HIRE -
OPTIONS REPORT & TAXICAB AND LIMOUSINE LICENSING BY-LAW - AMENDMENTS
REPORT**

In reply to the staff report entitled, Transportation Network Companies / Private Vehicles for Hire - Options Report” and “Taxicab and Limousine Licensing By-Law - Amendments” Report, please see the tables below.

With respect to this staff report, Uber Canada is supportive of the following:

- The staff report addressing licensing options for Transportation Network Companies (TNCs) / Private Vehicles for Hire be received by the Community and Protective Services Committee;
- That direction be provided to Civic Administration to organize public consultation sessions to allow for public feedback on the form and regulation of the vehicle for hire industry; and,
- As the staff report is written, Policy Options #5 - “Permit TNCs and PVHs Under New Categories - TNC Responsible for Safety and Consumer Protection Guidelines”.
- However, the staff report notes that, “There is a possibility that subject to public consultation, a recommended option might not be any one of the following options but a hybrid which includes a variety of regulations based on the City’s vehicle for hire guiding principles”.
 - Uber Canada suggests a hybrid of Policy Options #4 and #5 could be possible although not in the manner in which the staff report currently envisions Option #4.
 - The key change with ridesharing regulations is the move from dual-licensing (with companies and drivers both needing a license) to a unified regime where only companies are licensed and where anyone can become a driver so long as they meet/pass the standard criteria (background checks, etc.).

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- However, it must be noted that this model is a co-regulatory model and not self-regulation. This model does not reallocate safety and consumer protection responsibilities away from municipalities to a third party. The municipality still sets the regulatory requirements for ridesharing with respect to public safety and consumer protection. Under this regulatory model, for example, the third party provider (i.e. Garda in Quebec and ISB in Ontario) conducts the background check on behalf of the TNC required by regulation and the city audits the TNC to ensure compliance with the requirement to conduct said background check.
- Ultimately, Uber and cities share the same regulatory goals such as public safety and consumer protection, however the means used to achieve these objectives can differ based on different ridesharing and taxi business models.

Since launching Uber in Canada just over 4 years ago, Uber driver partners have completed nearly 16 million trips in Toronto alone to date. With this volume of trips to date, not only is the public support for Uber strong and growing rapidly across Southwestern Ontario and Canada, including London, it is indicative that the potential concerns around ridesharing expressed by some have not materialized.

TRANSPORTATION NETWORK COMPANIES / PRIVATE VEHICLES FOR HIRE - OPTIONS REPORT

Staff Report	Ridesharing Best Practices
<p>Vehicle for Hire Guiding Principles</p> <p>“Calling a vehicle-for-hire ‘ridesharing’ is nothing more than a marketing campaign or ‘buzzword’ which may deceive the public that they are somehow involved in a car pooling activity”.</p>	<p>The “sharing-economy” is all about better allocation of things like housing and cars. It doesn’t make sense for cars to sit unused for the vast majority of the day. A whopping 96 percent of cars are parked, unutilized, taking up valuable urban space, at any given time. Uber lets people push a button and get a ride, reducing the need for personal vehicle ownership, and freeing up those parking spaces spaces for better uses, like another lane, a park, or neighborhood shops.</p> <p>Opening by-laws up to allow for new technologies facilitates possibilities of what the future in London can be from a transportation perspective. Including ridesharing and other technology in the Region’s Transportation Master Plan is indicative of the broad and inclusive conversation taking place in cities today like the Region of Waterloo.</p> <p>UberPOOL is a prime example of a forward looking Uber product that matches riders who are heading in the same</p>

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	<p>direction in real time. When this happens at-scale, cities will reap the benefits of having fewer cars on the road, with reductions in both congestion and emissions. UberPOOL (think tech enabled carpooling), is currently available in Toronto and a host of other international cities.</p>
<p>Review of Public Opinion</p> <p>“Based on the above responses, there is general support for new operators of vehicle for hire services. There is strong support for similar safety regulations in line with the taxi industry”.</p>	<p>This section of the staff report does not include numerous polls in Ontario that show strong (rather than general) support for ridesharing/Uber and the development of new bylaws to allow ridesharing to operate in cities.</p> <ul style="list-style-type: none"> ● Environics Research (December 2015) <ul style="list-style-type: none"> ○ >50% support for Uber In Toronto. ● Forum Research Inc. survey (April 2015) <ul style="list-style-type: none"> ○ >75% of Torontonians do not support banning or restricting the operation of the Uber app. ● Nanos Research survey (September 2015) <ul style="list-style-type: none"> ○ >75% support for having the City of Toronto develop new City of Toronto by-laws to allow the uberX ridesharing service in Toronto. ● Nanos Research survey (February 2016) <ul style="list-style-type: none"> ○ 82% support City of Toronto working on new by-laws to regulate ridesharing services like Uber.
<p>Private Vehicle for Hire Insurance</p>	<p>Currently, every ride on the uberX platform is backed by contingent liability insurance coverage.</p> <p>Uber has previously announced a relationship with Intact Financial, Canada’s largest home, auto and business insurer.</p> <p>Intact Financial is working with insurance regulators and different levels of government in the provinces where ridesharing currently exists (Ontario, Alberta and Québec) to create a ridesharing specific insurance product in collaboration with stakeholders that satisfies the requirements of both insurance and transportation regulators.</p> <p>With respect to insurance, Edmonton’s ridesharing bylaw required as a condition, the approval of a ridesharing specific insurance product, such as the one AVIVA recently received approval for from the Financial Services Commission of Ontario (FSCO), and/or the ridesharing insurance program being pursued by Intact Financial for approval by FSCO (and the</p>

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	Alberta equivalent).
<p>What is the current vehicle for hire landscape in London?</p> <p>“In the 1980s, several US cities deregulated and removed taxicab caps. In many of the cities which deregulated, the supply of cabs increased, fares increased, service quality declined and there were more trip refusals, lower vehicle quality and aggressive solicitation of customers resulting from a higher supply of cabs”.</p>	<p>With respect to taxi deregulation in the 1980s, such reform efforts were from a time that was prior to the ubiquity of smartphones, the Internet, or the emergence of rideshare enabling technologies. The introduction of Uber actually results in the opposite along many dimensions of what is suggested (lower driver incomes, less investment, etc.):</p> <ul style="list-style-type: none"> ● With the prevalence of the Internet today, Uber customers using a smartphone app to request a ride, are able to compare prices and the quality of customer service offered by a range of companies, more easily than ever before. This was not the case in the 1980s or for academics that studied the issue prior to the last 5 years or so, which explains why in the absence of information and being able to compare prices and quality of service between taxi companies, prices rose and quality of service declined. However, open entry for companies like Uber has meant improved transportation availability and lower rates. The ability of consumers in the Internet era to more readily access information and share it (both positive and negative), means that companies like Uber have to continually strive to improve customer service or risk losing customers to competitors. ● Flexible supply and dynamic pricing on the Uber platform enables drivers to come on the road when they are needed which increases operational efficiency and productivity in contrast to having an increased number of taxis on the road at all times increasing congestion. ● Ridesharing alternatives actually help to relieve congestion. UberPool, like carpooling when you share a ride and split the costs, has profound implications. On average uberX is already 30% to 50% cheaper than traditional taxi and becomes upwards of 80% cheaper with UberPool. This allows Uber to become cost competitive with owning a car. Technological innovations like UberPool which were not possible pre smartphone can achieve real results in terms of reducing the number of cars on the road, congestion in cities, pollution, and parking challenges. ● In cities, where Uber has introduced uberX, rates for riders have decreased. UberX is about 30-50% cheaper

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	<p>than a taxi, depending on the city in Canada. With the affordability of uberX, even more users can rely on a safe and reliable ride. At the same time, as long as demand keeps growing, and Uber has seen no sign that it won't in the markets it has entered, that means there are more riders, and that means drivers will be doing more trips per hour. The more efficient a driver is, the more money they earn.</p> <ul style="list-style-type: none"> • High customer service levels are a core value of the Uber platform. Collecting feedback is an important part of ensuring a high quality experience for Uber riders and partners alike. That's why riders are encouraged to anonymously rate and provide comments about their experience at the end of every trip and drivers can do the same. This feedback is continuously monitored to improve customer service and experience.
<p>Option #1 Status Quo “This option involves no changes to the current administration and enforcement of the Taxi and Limousine Licensing By-law”.</p>	<p>Option #1 is not an option that respects the September 29, 2015 Motion adopted by London Council for the provision by Civic Administration of “licensing options with respect new ground transportation providers (TNCs)...”.</p>
<p>Option #2 Permit TNCs to Operate as Brokers & PVHs to Operate as Taxis</p>	<p>Option #2 does not allow for TNCs and PVHs to offer a new form of competitive transportation in London. As with Option #1, it is not respectful of the will of City Council expressed in its Motion of September 29, 2015, to license new ground transportation providers like Uber.</p> <p>The intent of the September 29th Motion passed is to examine and potentially adopt regulations akin to ridesharing regulations passed in dozens of cities in the United States, and most recently in Edmonton, that create a licensing category for TNCs (ridesharing companies).</p> <p>Ridesharing is one part of a growing sharing economy enabled by digital technology used by TNCs like Uber. Ridesharing services are distinct from traditional taxi services. Ridesharing does not street hail or occupy taxi stands, they do not use taxi meters, all transactions are electronic, and it's underpinned by a digital peer-to-peer platform, where rides are matched based on geographic location which minimizes travel distance and waiting times.</p>

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	<p>In addition, ridesharing is largely an ad hoc commercial pursuit with uberX driver partners offering a shared ride on a schedule of their choosing. This is different from the traditional taxi industry. While there are full-time uberX driver partners on the Uber platform, most Uber driver partners drive on the Uber platform for less than 10 hours a week. In many ways, Uber for these driver partners is not a full-time or part-time opportunity, but an opportunity to earn a few extra thousands of dollars a year to pay for a family vacation, save for a mortgage down payment, retirement, etc.</p> <p>The attraction of the ridesharing proposition is to build it around personal and family schedules, be it 5 a.m., 5 p.m., or 10:37 p.m. It means driving for 3 hours one week, none the next two weeks, and driving again the following week for 6.3 hours. It also means driving full-time in the event of a sudden job loss. The flexibility rests totally with Uber driver partners.</p>
<p>Option #3 Permit TNCs to Operate as Brokers & PVHs to Operate as Limousines</p>	<p>As with Options #1 and #2, Option #3 is not respectful of the will of City Council expressed in its Motion of September 29, 2015, to license new ground transportation providers like Uber.</p> <p>The intent of the September 29th Motion passed is to examine and potentially adopt regulations akin to ridesharing regulations passed in dozens of cities in the United States, and most recently in Edmonton, that create a licensing category for TNCs (ridesharing companies).</p> <p>Ridesharing is unique from taxi as it relies upon personal vehicles not limousines or taxis. Ridesharing driver partners use their own personal and/or family vehicles for use on the Uber platform (subject to a vehicle inspection by a certified auto mechanic). Requiring the citizens of London to acquire a limousine in order to access ridesharing and the sharing economy, is an unnecessary burden for those looking to supplement their income with a few hours of driving a week or for those that may be looking to make ends meet after a sudden loss of other full-time or part-time employment.</p> <p>Almost two-thirds of Uber partners in Ontario drive less than 10 hours per week (taxis are generally on the road 24 hours a day in 12 hour shifts). In Ontario, they are using vehicles that have a median age of 5 years old and are not allowed to be rebuilt or more than 10 years old.</p>
<p>Option #4 Permit TNCs and PVHs Under New</p>	<p>As provided for in the staff report, Option 4 would not work with the ridesharing model, as it would require all vehicles, including</p>

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<p>Categories - City Retains Responsibility for Safety & Consumer Protection Regulations</p>	<p>ridesharing vehicles, to have security cameras, in class driver training, etc. See other sections of this report that address these issues.</p> <p>Although common objectives are shared with respect to public safety and consumer protection, different means can be used to achieve them, recognizing the unique ridesharing business model as compared to the traditional taxi model.</p> <p>Operating under fixed assumptions of current regulatory models that limit competition, regulators often suggest that there is only a fixed number of rides in a given city. With shifting demographics, growing urban lifestyles, driving behaviours, and technology enabled offerings like ridesharing, that statement could not be further from the new reality. Helping citizens connect with and explore their city is not a zero sum game. Uber is in fact growing the pie by offering a safe, but principally more reliable and more affordable transportation option.</p>
<p>Option #5 Permit TNCs and PVHs Under New Categories - TNC Responsible for Safety and Consumer Protection Guidelines</p>	<p>This option gets closest to the ridesharing regulatory model adopted in jurisdictions across the United States and in Edmonton, the first Canadian city to adopt ridesharing regulations.</p> <p>The key change with ridesharing regulations is the move from dual-licensing (with companies and drivers both needing a license) to a unified regime where only companies are licensed and where anyone can become a driver so long as they meet/pass the standard criteria (background checks, etc.).</p> <p>However, it must be noted that this model is a co-regulatory model and not self-regulation. This model does not reallocate safety and consumer protection responsibilities away from municipalities to a third party. The municipality still sets the regulatory requirements for ridesharing with respect to public safety and consumer protection. Under this regulatory model, for example, the TNC conducts the background check through a third party provider (Garda in Quebec for example) required by regulation and the city audits the TNC to ensure compliance with the requirement to conduct said background check.</p> <p>Ultimately, Uber and cities share the same regulatory goals such as public safety and consumer protection, however the means used to achieve these objectives can differ based on different ridesharing and taxi business models.</p>

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For example, does the vehicle inspection for a ridesharing vehicle need to be carried out by a mechanic with a City, or can the inspection be conducted by certified auto mechanics providing service in a City? The objective of a vehicle inspection is still obtained, but without additional regulatory burden of having ridesharing driver partners have to come to one City facility during business hours when they are otherwise engaged in other part-time or full-time employment. What works under a traditional taxi business and regulatory model, does not work under a ridesharing model.

With respect to consumer protection, the goal at Uber is to ensure everyone can push a button and always get a ride within minutes—whatever the weather and on the busiest nights of the year. Uber’s dynamic pricing model, or “surge” pricing as it is known, makes this possible.

Uber riders always know the price (base fare + time and distance) of a ride in app in advance of making a ride request.

Uber also provides an “estimate your fare” feature so riders can always check the price in advance from where they are to where they are going.

When riders open the app, they instantly see whether their Uber ride is surging thanks to the lightning bolt icon at the bottom of their smartphone screen. If they request a ride, a popup alerts them to the surge multiplier at that time, and they’re then asked to confirm the fare increase or given the option to be notified when the price drops. When the multiplier is unusually high, riders will be asked to manually type-in the multiplier to ensure they really are OK to pay the higher fare.

Flexible supply and dynamic pricing on the Uber platform enables drivers to come on the road when they are needed which increases operational efficiency and productivity in contrast to having an increased number of taxis on the road at all times increasing congestion.

Flexible supply best meets consumer demand (No supply caps):

- Cities and residents should enjoy transportation alternatives that are reliable at all times of day in all communities.

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	<ul style="list-style-type: none"> • Traditionally underserved communities get greater access to reliable and affordable transportation. For example, in a mature Uber market like Chicago, four in ten trips begin or end in what the city has deemed to be traditionally underserved neighbourhoods. <p>In cities across Canada, traditional taxi regulations restrict entry by requiring a license to operate a taxi. This limits the supply of available taxis in a city. While taxis are an integral component of the urban transportation network of any city, and will remain so into the future, the main effect of such supply restriction, is that prices remain high, taxis wait times are longer, among other undesirable policy outcomes.</p> <p>Regulating ridesharing is an opportunity to re-examine the regulations governing the taxi and limo industries and make necessary changes to reduce the regulatory burden on them and help them be more competitive in a changing ground transportation industry.</p>
<p><u>Review of Regulations Insurance</u> “City Administration is aware that although the initial part time insurance product does have some limitations and challenges from a compliance perspective, there are further discussions with other insurance brokers and FSCO on this matter”.</p>	<p>The ridesharing insurance product proposed by Intact Financial for approval by the Financial Services Commission of Ontario (FSCO) is not a part time insurance product (limiting the # of hours per week a ridesharing driver partner could operate on a ridesharing platform) but would provide appropriate coverage for the various times ridesharing driver partners may spend on the platform each day, week or otherwise. In this respect, the Intact Financial ridesharing insurance product, if and when approved by FSCO, would eliminate any challenges that may exist with respect to compliance as it concerns the ridesharing insurance product currently offered by Aviva.</p>
<p><u>Vehicle Inspections</u> “The Taxi and Limousine By-law requires owners to submit at the time of annual licence renewal a Safety Standards Certificate issued within the previous 60 days of the renewal application”.</p>	<p>Uber vehicles are not permitted to be more than 10 years old on the platform. Given that a majority of Uber driver partners drive less than 10 hours a week on the platform, ridesharing vehicles are subject to less wear and tear than traditional taxis that are generally on the road 24-hours a day (two 12-hour driver shifts).</p> <p>In Edmonton, Uber’s annual 26-point vehicle inspection conducted by any provincially certified auto mechanic is accepted and compliance confirmed via audit by City.</p> <p>In addition, after each trip, riders can provide real-time feedback on trips by rating drivers on a 5-star rating system, in addition to providing written feedback on trips that is monitored</p>

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	<p>and responded to by Uber 24-hours a day.</p>
<p>Safety Dash Cameras “TNCs are generally not supportive of camera regulations”.</p>	<p>Security cameras may make sense for taxis because of the nature of taxis business model. Whether someone calls a broker, street hails, or gets a taxi at a taxi stand, the passenger remains anonymous to the taxi brokerage and taxi driver. When passengers are anonymous and drivers carry cash, security cameras are necessary.</p> <p>On the other hand, TNCs leverage its technology to achieve a safety experience for rider and driver in ways that others cannot. Cameras in cars are not needed--and do not work--with an industry where a significant percentage of drivers are very occasional.</p> <p>With uberX, trips are not anonymous. When a driver-partner accepts a request, a rider sees his or her first name, photo, vehicle model, and license plate number.</p> <p>In cities across Ontario, limousines are not currently required to have in vehicle cameras because, like TNCs (Uber), the limousine model is based on prearrangement between two parties that must identify themselves.</p> <p>The Ottawa Policy Options paper paper notes that, “...there have not been any incidents which would suggest cameras should be a requirement under the amended regulation”. The City of Calgary and Edmonton in their ridesharing regulations is not making it a requirement that Transportation Network Companies (TNCs) like Uber have security cameras in ridesharing vehicles for these reasons.</p> <p>In addition, uberX is also a cashless platform, which means drivers do not need to carry cash in vehicle, every trip is GPS monitored, and each trip is subject to in app feedback mechanisms (that include the ability to provide written feedback after each trip) that is monitored and responded to in real time by Uber.</p>
<p>Medical Certificate “From a public safety perspective, it is important to verify the requirement for a medical certificate for a driver’s licence.”</p>	<p>Most of ridesharing driver partners drive on ridesharing platforms part time. These are not truck drivers or taxi drivers driving full time. Ridesharing driver partners are already using their personal vehicles to drive loved ones around without physicals as are Ontarians.</p> <p>Because there is no anonymity on ridesharing platforms, and Uber has a driver partner rating system and 24/7 customer</p>

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	<p>response capacity, Uber has the ability to know about various issues related to a driver partner's performance and address them quickly (including remotely shutting down access to accepting trip requests by a driver partner account). While features are typically used to resolve issues like lost items or recommendations for driver partners to improve the quality of their service, it does allow Uber to know if there is any concern with the driver partner's health and/or driving.</p>
<p>Fees “The average cost of licensing per vehicle-for-hire ride is \$0.16 per ride. There has been some discussion on charging fees based on rides in place of application fees”.</p>	<p>A flat annual fee imposed on the Transportation Network Company (Uber) rather than per driver and/or vehicle fees ensure a City recoups regulatory compliance costs while not creating an unnecessary obstacle to local citizens looking to rideshare as a means to supplement income.</p> <p>The Edmonton ridesharing by-law licenses the Transportation Network Company (Uber) and fees are imposed on Uber rather than the individual driver partner looking to take advantage of a flexible earning opportunity via the sharing economy.</p> <p>Edmonton has a flat annual licensing fee for TNCs of \$50,000 + a per ride fee of \$0.06.</p> <p>The key change with ridesharing regulations is the move from dual-licensing (with companies and drivers both needing a license) to a unified regime where only companies are licensed and where anyone can become a driver so long as they meet/pass the standard criteria (background checks, etc.).</p> <p>Separate requirements on drivers deter people who only want to drive for a few hours each week and will benefit from this kind of flexible work.</p>
<p>Vehicle Identification “Vehicle identification is a key issue which will benefit from public engagement. Some vehicle signage is necessary to prevent clients from entering into wrong vehicles as well as to deter PVH imposters. Vehicle identification is also required to assist with field enforcement”.</p>	<p>In a large majority of markets in which ridesharing/Uber is regulated in the U.S., decals or vehicle identification is not required. It is often not required due to the fact that an Uber passenger already receives the picture of the driver, name of the driver, make and model of the vehicle and driver plate licence number when making a request for a ride on the Uber platform.</p> <p>Since launching Uber in Canada just over 4 years ago, Uber driver partners have completed nearly 16 million trips in Toronto alone to date. If entering wrong vehicles was an issue, this would have been identified by ridesharing riders as an issue.</p>

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	<p>Making a decal or identifier mandatory on Uber vehicles presents the possibility that drivers not affiliated with Uber (in addition to be subject to the background check and vehicle inspection requirements of the Uber platform) may try to use a decal to street hail passengers similar to ways in which “bandit” cabs currently street hail passengers.</p> <p>With respect to street enforcement by bylaw officers, enforcement officers can be provided with dedicated rider accounts that could be used to order Uber rides for compliance purposes. Uber Driver partners would not know who is ordering a ride when they receive a request. Vehicle identification for field enforcement therefore is not an issue.</p>
<p>Criminal Record Checks “Permitting third party criminal records analysis may appear to be cost effective on face value, however, the long-term risks to public safety far outweigh any short-term cost savings”.</p>	<p>Uber’s background checks use CPIC to search the National Repository of Criminal Records and PIP to search local police records.</p> <p>Uber’s background check uses the same checks as Girl Guides of Canada and other national and provincial organizations.</p> <p>Third party criminal records analysis is used globally by companies and organizations to conduct background checks and ridesharing regulations allow them in jurisdictions in the United States that regulate ridesharing, including in Edmonton. In Canada, Uber currently uses ISB, First Advantage, and Garda to conduct these checks.</p> <p>Uber driver partners are also subject to a local police check, provincial motor vehicle reference check for ticketable offences, 26-point vehicle inspection by certified mechanic, and insurance.</p> <p>Trips are not anonymous When a driver-partner accepts a request, a rider sees his or her first name, photo, vehicle model, and license plate number. Riders can also check whether others have had a good experience with him or her.</p> <p>Share your location Riders can easily share their trip details -- including the specific route and estimated time of arrival -- with selected friends or family at the touch of a button.</p> <p>Feedback and ratings after every trip</p>

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	<p>Riders and driver-partners are asked to rate each other and provide feedback for every trip before requesting or accepting another ride.</p> <p>24/7 support If riders or driver-partners have any questions about their trip, or if they need to report an incident, our customer support team is ready to respond to any issues.</p> <p>Rapid response We have a dedicated Incident Response Team to answer any urgent issues. If we receive a report that there has been an accident or incident, we can suspend the relevant parties and prevent them from accessing the platform until the matter is resolved.</p> <p>Contact drivers without providing personal information Uber uses technology that anonymizes riders' and driver-partners' phone numbers so that they do not have each other's real contact details.</p> <p>Always on the map Global Positioning System (GPS) data for all rides on the Uber platform are logged so we know which driver-partners and riders are riding together and where they are for the duration of their trip. GPS also enables us to verify the efficiency of every route being used, which creates accountability and a strong incentive for good behaviour.</p>
<p>Driver Training "The Taxi and Limousine By-law requires applicants to complete an English assessment exam and vehicle for hire training exam administered by the City...There is no rationale from a public policy perspective to create two classes of driver training and testing modules based on the method the driver generally accepts trip requests".</p>	<p>Requiring an English-language proficiency assessment or a valid Ontario secondary school graduation diploma are measures that discriminate against new Canadians by prohibiting them from accessing a flexible earning opportunity.</p> <p>In addition, the Uber app works with the language settings built into modern smartphones that enable driver partners and riders to use the Uber app in English, or one of dozens of languages of their choice like German, Spanish, Korean, etc.</p> <p>Requiring in class driver training courses would be a huge barrier for London residents looking to use a ridesharing platform to supplement their income, given that the majority of them have full-time jobs and only rideshare for a few hours per week. And driver training courses have proven far less effective than in-app ratings at ensuring good service, as noted in the City of Ottawa's report on customer service (see below).</p>

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	<p>Uber uses GPS technology in app for routing trips. Passengers can determine their location and destination by using GPS and/or entering information such as an address or location name (i.e. hotel name, restaurant name, etc.).</p> <p>Uber facilitates learning and training on using the app and customer service, among other items.</p> <p>With the Uber app, riders and driver-partners are asked to rate each other and provide feedback for every trip before requesting or accepting another ride. This feedback is monitored and responded to by Uber 24-hours a day.</p> <p>The fact that Uber driver partners know they are being rated on each trip, in addition to the feedback provided after trips by riders, enables Uber driver partners to constantly improve customer service.</p> <p>As Ottawa's Policy Options paper notes, "Customer service concerns have been raised by users of the traditional taxi service, while customer service provided by Uber drivers has been reported as generally being very good. This raises a question as the effectiveness of the course relative to other mechanisms, such as driver rating".</p> <p>Research firm Core Strategies who conducted the focus groups in September 2015 for the City of Ottawa's taxi bylaw review, reported that Uber scored higher than taxi for car cleanliness, comfort and driver courtesy. Uber driver partners were found to be more caring, professional, and engaged than taxi drivers.</p>
<p>Driver Record Screening "As part of the application process, the applicant must submit a Ministry of Transportation drivers abstract dated no later than 60 days prior to the application for a licence...There is no public policy rationale to support third party screening".</p>	<p>Uber Canada already requires the submission and review of Ministry of Transportation drivers abstracts before driver partners are granted access to the Uber platform.</p> <p>The key change with ridesharing regulations is the move from dual-licensing (with companies and drivers both needing a license) to a unified regime where only companies are licensed and where anyone can become a driver so long as they meet/pass the standard criteria (background checks, drivers abstract check, etc.).</p> <p>Under the TNC model of regulation, the Transportation Network Company (Uber), restricts access to the platform by driver partners. Only those authorized to drive by Uber, have</p>

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	<p>access to the driver partner app to receive ride requests. The City audits the practices to ensure compliance in this regard with respect to drivers abstract checks, criminal records check, etc.</p>
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With respect to the, “Taxicab and Limousine Licensing By-Law - Amendments” Report:

Staff Report	Ridesharing Best Practices
<p>Harmonized Sales Tax</p> <p>“All drivers collect the federal HST tax via the fares and are responsible for submitting the HST tax collected from passengers to the federal government. From an administrative perspective, it would be preferable to document the HST registration number from all the licence applicants at the time of the application process”.</p>	<p>With respect to the GST (or the HST where applicable in Canada), it is a sales tax that is customarily charged to the purchaser of a service (passenger in an Uber driver partner vehicle) and remitted to the government by the service provider (Uber driver partner). Uber Canada takes into account GST and factors it into the price of fares, to enable driver partner friendly economics.</p> <p>Whether or not an independent contractor (in this case the Uber driver partner) is remitting GST/HST depends on their own personal income. The threshold for the filing of GST/HST kicks in for independent contractors at the \$30,000 level according to the CRA.</p> <p>Uber Canada explains to our Uber driver partners that any taxes due on trips are the responsibility of the partner to remit based on their own personal income situation. However, like other contractors in various sectors of the Canadian economy, it is ultimately the Uber driver partner’s responsibility to comply with relevant CRA tax related obligations.</p> <p>The independent contract nature of being an Uber driver partner is what fundamentally enables Ontarians from all walks of life to tap into the sharing economy to earn extra income with the added benefit of flexibility to set their own schedule and work around the schedules of other part- and full-time jobs and family commitments.</p>
<p>Student Fare Discounts</p> <p>“It is the position of Civic Administration that fares could be discounted by a maximum of 10% for</p>	<p>The goal at Uber is to ensure everyone can push a button and always get a ride within minutes—whatever the weather and on the busiest nights of the year. Uber’s dynamic pricing model, or “surge” pricing as it is known, makes this possible.</p> <p>Uber riders always know the price (base fare + time and distance) of a ride in app in advance of making a ride request.</p>

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<p>student clients. Civic Administration does not support allowing discounting fares with no minimum limit or surge pricing with no maximum limit. Fares are set for the greater public good whereby the public has a certain expectation and certainty on the cost of this public transportation service. Discounting affairs with no minimum limit would lead to what's known in the industry as “a race to the bottom”. This results in reduced profits for drivers which may inherently result in declining vehicle maintenance and customer service.”</p>	<p>Uber also provides an “estimate your fare” feature so riders can always check the price in advance from where they are to where they are going.</p> <p>When riders open the app, they instantly see whether their Uber ride is surging thanks to the lightning bolt icon at the bottom of their smartphone screen. If they request a ride, a popup alerts them to the surge multiplier at that time, and they're then asked to confirm the fare increase or given the option to be notified when the price drops. When the multiplier is unusually high, riders will be asked to manually type-in the multiplier to ensure they really are OK to pay the higher fare.</p> <p>Minimum fares are bad for drivers and riders. Drivers earn less money and consumers pay too much when Uber is prevented from lowering prices.</p> <p>For some cities, 2016 was the third year in a row where Uber cut prices, and driver earnings in those cities continue to rise year after year. A price minimum may prevent Uber and taxi from reducing prices to the benefit of drivers (who earn more money after price cuts due to increased demand, and riders who benefit from price competition in the market and lower prices).</p> <p>Lower prices increase demand, and higher demand means more time driving and increased driver earnings.</p> <p>As an example, Uber cut prices in Ottawa last June and again this January and as a result, driver partner earnings are up 30% on average.</p> <p>Since Uber's launch in Ottawa in October 2014, driver partner earnings have increased an average of 65%. The latest earnings increase came since Uber reduced prices in early January 2016.</p> <p>Minimum fares could also prevent the introduction of uberPOOL (carpooling facilitated through the Uber app) in Sudbury. Fares for uberPOOL rides are less expensive per rider than riding alone in an uberX vehicle.</p> <p>At the same time, independent research by Research firm Core Strategies who conducted the focus groups in September 2015 for the City of Ottawa's taxi bylaw review, found that Uber scored higher than taxi for car cleanliness, comfort and driver</p>
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	courtesy. Uber driver partners were found to be more caring, professional, and engaged than taxi drivers.
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