

UBER

June 20, 2016

Betty Mercier
Committee Secretary
City Clerk's Office
City of London
300 Dufferin Avenue
London, Ontario
P.O. BOX 5035
N6A 4L9

Dear Ms. Mercier,

RE: EXISTING VEHICLE-FOR-HIRE INDUSTRY JUNE 21, 2016

In reply to the staff report entitled, Existing Vehicle-for-Hire Industry June 21, 2016, I am attaching a table that outlines the positions taken by a number of Canadian and Ontario ridesharing bylaws (Edmonton, Ottawa, and Toronto) with respect to the issues before the City of London concerning potential regulatory changes to address ridesharing and Transportation Network Companies (TNCs) like Uber.

In addition, I also indicate how Region of Waterloo staff are addressing the same issues, including how the policy experts at the MaRS Centre for Social Innovation addressed the same issues in their report on ridesharing for the Ontario and City of Toronto governments.

I look forward to continuing to work with Orest Katolyk and city staff and Council on these issues.

Sincerely,



Chris Schafer
Public Policy Manager
Uber Canada

ISSUE	MaRS REPORT	TORONTO BYLAW	OTTAWA BYLAW	EDMONTON BYLAW	WATERLOO STAFF REPORT	LONDON STAFF REPORTS	UBER POSITION
<p>Number of Permitted Vehicles Including Accessible Taxis</p> <p>Potential Cap on the Number of Uber Drivers at any one time</p>	<p>No position</p>	<p>No cap on number of Uber drivers at any one time</p>	<p>No cap on number of Uber drivers at any one time</p>	<p>No cap on number of Uber drivers at any one time</p>	<p>No cap on number of Uber drivers at any one time</p>	<p>City staff appears to favour limits on taxi: maintaining the plate/population ratio as is.</p> <p>Inconclusive with respect to new entrants into market.</p>	<p>Uber does not support capping number of Uber drivers at any one time:</p> <p>No jurisdiction in the world under regulation for ridesharing has capped the # of Uber drivers</p> <p>Capping vehicle supply will frustrate riders who have to wait longer for a ride when they need one.</p> <p>Traditionally underserved communities get greater access to reliable and affordable transportation when there are no caps on # of drivers.</p> <p>Not capping # of drivers enables the ground transportation industry (taxi et al.) to “grow the pie” as more residents live car-free and/or car-light lifestyles.</p> <p>Not capping driver supply creates flexible earning opportunities for local residents that need them.</p> <p>Not all TNC/Uber vehicles are on the road at any one time. Given the flexible nature of ridesharing, TNC supply on the roads at any one time matches closely rider demand.</p>

ISSUE	MaRS REPORT	TORONTO BYLAW	OTTAWA BYLAW	EDMONTON BYLAW	WATERLOO STAFF REPORT	LONDON STAFF REPORTS	UBER POSITION
Fares	<p>Let taxi decide pricing in app; street hails / taxi stand at fixed rate</p> <p>No limit on new entrants into market</p>	<p>Let taxi discount fare in app; street hails / taxi stand at fixed rate</p> <p>No limit on new entrants into market</p> <p>Minimum fare set at \$3.25</p>	<p>Let taxi discount fare or surge price in app; street hails / taxi stand at fixed rate</p> <p>No limit on new entrants into market</p>	<p>Let taxi discount fare or surge price in app; street hails / taxi stand at fixed rate</p> <p>Minimum fare set at \$3.25 for new entrants into market</p>	<p>Set fares for taxis that provide a “hail” service but do not impose a fee for a pre-booked service.</p>	<p>Unknown</p>	<p>Uber does not support a surge price cap or any form of price cap:</p> <p>No jurisdiction in world has capped surge pricing / No bylaw or City staff report anywhere in Canada has proposed capping surge pricing. (Some jurisdictions cap surge pricing during times of declared state/local emergency).</p> <p>Consideration could be given to permit taxi to offer rates discounted from city-regulated rate if passenger books through brokerage. Consideration could be given to permit taxi to offer surge pricing if done in app only with consumer protection safeguards.</p> <p>Consumer Protection:</p> <p>Price is always transparent in Uber app.</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>Uber provides an “estimate your fare” feature so riders can always check the price in advance.</p>

							Multiple Uber riders in an Uber vehicle at same time can split fare electronically in app to save money.
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Driver Background Checks	<p>Broker administered</p> <p>Every driver should have a proper background check (both criminal and driver history); brokers should administer this process instead of the city</p> <p>No medical</p>	<p>Broker administered</p> <p>Background check (both criminal and driver history) brokers administer it</p> <p>No medical</p>	<p>Broker administered</p> <p>Background check (both criminal and driver history) brokers administer it</p> <p>No medical</p>	<p>Broker administered</p> <p>Background check (both criminal and driver history) brokers administer it</p> <p>No medical</p>	<p>To be determined</p> <p>No medical</p>	<p>City administered</p> <p>City run background check (criminal), driver history, vehicle safety, medical assessment.</p>	<p>Uber supports the broker administered model. Uber currently subjects drivers to a background screening, motor vehicle reference check, vehicle inspection. Uber does not support medical assessments (and neither do other cities as noted).</p> <p>Uber: Background Screening</p> <p>Uber contracts with screening providers such as ISB Canada. These providers have relationships with local police forces that search the National Repository of Criminal Records and the Police Information Portal (PIP) and Firearms Interest Police (FIP) databases which contains local police information.</p> <p>As per the RCMP's policy, if the police agency finds a record on one of the databases searched, it informs Uber via the third-party that a record has been found. We then inform the driver-partner that they will not be able to gain access to the platform. If the search is inconclusive, then fingerprinting is required to confirm the existence of a record. At that point the partner is provided the opportunity to go through a fingerprinting process at a local police station to complete the check. Only partners who have no record found in the</p>

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Cameras / emergency lights	No position	Yes Taxi No Limo & Uber / Ridesharing	Yes Taxi No Limo & Uber / Ridesharing	Yes Taxi No Limo & Uber / Ridesharing	Yes Taxi No Limo & Uber / Ridesharing	Yes Taxi All vehicles for hire including Uber / Ridesharing require camera	<p>databases searched are permitted to gain access to the partner app and offer rides.</p> <p>Uber does not support in-vehicle cameras.</p> <p>No regulations for ridesharing anywhere in the world have required cameras or emergency lights.</p> <p>PTCs (Uber) and Limos only accept pre-arranged rides. Limos have historically not required a camera. Uber and Limo are more alike in this regard because trips are pre-arranged.</p> <p>Pre-arranged trips through an app (with driver and vehicle information and ratings provided to the customer, and customer identification provided to the driver, with computerized records of the information) provides additional security.</p> <p>TNCs (Uber) do not accept cash / drivers don't carry cash. Thus, reduced risk of theft as cash payment not accepted.</p> <p>Pre-arranged rides where information of both parties is shared between parties and the TNC adds a level of security that does not exist with taxi.</p> <p>Should event occur in vehicle identity of both individuals is documented.</p>

							<p>Cameras required for taxi because taxis pick-up unknown persons on street by street hails / taxi stand. Cameras add a measure of protection for taxi drivers where other such protections inherent in Limo and TNC model do not exist.</p> <p>Cameras while not contributing to additional safety for vehicle occupants as outlined above, at a cost of \$1,000+, represents a significant barrier to entry for ridesharing drivers, a majority whom drive for less than 10 hours a week.</p>
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Vehicle Age	No position	7 years	10 years	10 years	Can be more than 10 years old (with twice annual Safety Standard Certificate certification)	No position known to date	<p>10 years</p> <p>PTC vehicles are personal vehicles driven less than taxi and majority <10 hours a week. Most cities in Canada under ridesharing regulations are requiring annual Safety Standard Certificate vehicle inspections, coupled with how well modern cars are built, means 10 year vehicle age limit is acceptable. Reporting mechanism in app allows issues to be reported.</p>
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Vehicle Marking	No position	PTC vehicle display a	No vehicle marking or	No vehicle identification	Vehicle marking required	Vehicle marking required	No decal or signage

		PTC identifier on back of vehicle while in operation	decal required	or decal required			Decal is unnecessary to identify TNC vehicle to enter (riders already receive licence plate #, vehicle make/model, driver photo and name in app). Decal may continue to be used after a TNC has remotely deactivated a driver's account, which presents potential public safety issue. Enforcement can book Uber rides for spot checks through app without need for vehicle marking.
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Training Exams	No Set criteria for basic training - leave to TNCs to provide training	No No city mandated training TNCs provide training to drivers	No No city mandated training except drivers of accessible vehicles TNCs provide training to drivers	No TNCs to train drivers	No That brokers be responsible for training their drivers and accessibility training be mandatory for drivers providing that service	Yes English assessment exam + "knowledge of City locations" training	TNCs already provide online training. Independent studies (i.e. KPMG in Ottawa) show Uber without traditional training course outperforms taxi on customer service measures. Driver ratings and real-time feedback on customer service in app allows customers to apply effective customer service "discipline". English exam is discriminatory against recent immigrants and technology in app allows drivers and riders to use app in their choice of language without requiring any spoken word. GPS routing is provided for in app which makes local geography training unnecessary and GPS enables efficient transportation to

							city locations, tourist or otherwise.
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