

In The Matter Of:
Rhode Island Public Utilities Commission

Transportation Network Companies Rulemaking D-17-27
July 19, 2017



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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF PUBLIC UTILITIES AND CARRIERS

IN RE:

RULEMAKING - DOCKET D-17-27

TRANSPORTATION NETWORK COMPANIES

Date: July 19, 2017

Time: 10:00 a.m.

Place: 89 Jefferson Blvd.

Warwick, Rhode Island

- BEFORE -

John Spirito, Hearing Officer

APPEARANCES:

FOR THE ADVOCACY SECTION....CHRISTI HETHERINGTON, ESQ.

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E X H I B I T S

(DIVISION'S FULL)

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*Above exhibits retained by the hearing officer.

1 (HEARING COMMENCED AT 10:07 A.M.)

2 THE HEARING OFFICER: My name is John
3 Spirito. I'm the hearing officer in this rulemaking
4 proceeding. This matter is designed to address
5 proposed rules and regulations governing the
6 transportation of passengers via transportation
7 network companies. The public notice for this
8 rulemaking was Monday, June 26, which noticed this
9 morning's hearing, and the comment period in this
10 matter expires on July 28 of 2017. I think you all
11 know what the rulemaking is about, and the purpose
12 for this hearing is to offer an opportunity to the
13 public, and those interested parties who wish to
14 offer public comment on these proposed rules. So,
15 for the record, let me first start with an
16 introduction of the Advocacy Section.

17 MS. HETHERINGTON: Thank you, Mr.
18 Hearing Officer. Good morning. My name is Christi
19 Hetherington. I am here representing the Advocacy
20 Section of the Division of Public Utilities and
21 Carriers. With me today is Mr. Terrence Mercer,
22 associate administrator of the Motor Carriers Section
23 of the Division, just here -- obviously, we're here
24 for public comment. I would, at your pleasure,
25 briefly offer Mr. Mercer as a witness to kind of get

1 the ball rolling, and to give some context to this
2 rulemaking today. Thank you.

3 THE HEARING OFFICER: Thank you. That
4 would be great. Let's do that now.

5 MS. HETHERINGTON: I don't know if --
6 do we want to have him sworn in, or more informal?

7 THE HEARING OFFICER: No. It's not a
8 contested case. It's just a rulemaking.

9 MS. HETHERINGTON: Okay.

10 QUESTIONING BY MS. HETHERINGTON

11 Q. Mr. Mercer, could you, just for the record, state
12 your name and position here?

13 A. My name is Terrence Mercer. I'm the
14 associate administrator for the Motor Carriers
15 Section for the Division of Public Utilities and
16 Carriers.

17 Q. And for how long have you held this position?

18 A. I've been with the Division for 17 and-a-half
19 years, in this position for 15 and-a-half.

20 Q. And can you briefly tell me what your role in that
21 capacity is?

22 A. As the associate administrator in charge of the
23 Motor Carriers Section, I oversee the regulatory
24 framework and enforcement of all for-hire carriers in
25 Rhode Island. That would include passenger carriers

1 and property carriers, and the newest addition to the
2 realm of passenger carriers is what's been termed
3 Transportation Network Companies.

4 Q. And so, this is kind of a natural continuation of
5 what your duties have been, correct, to regulate the
6 TNCs, if you will?

7 A. Sure, and to oversee the promulgation of rules
8 associated with those industries.

9 Q. Okay. And have you been party to the legislative --
10 legislation behind what brought us here today?

11 A. Sure. We're here today because the last -- the
12 2016 General Assembly session of Rhode Island
13 legislature passed a new set of statutes entitled --
14 it was Chapter 14.2, which created an industry that
15 they termed the Transportation Network Company
16 Industry. Chapter 14.2 sets the regulatory framework
17 for that new industry, and within that chapter was a
18 section regarding powers of the Division that
19 requires the Division to establish, promulgate a set
20 of -- comprehensive set of rules to govern that
21 industry, and enforce the statutes.

22 Q. Okay. So, in essence, these rules are required by
23 statute?

24 A. Yes. They're -- I don't know if they're
25 necessarily required, but they're certainly allowed

1 by statute.

2 Q. And you've played a role in crafting and vetting the
3 proposed rules?

4 A. Yeah, it was a collective effort among some of
5 the department personnel in the Division, but I
6 certainly had a hand in it.

7 Q. And I'm presuming that the proposed rules and
8 regulations are on record with the Division; and,
9 certainly, if anyone needs a copy, we can provide
10 those. I don't know if I need to formally adopt
11 them, per se. However, I did want to ask if there
12 are changes or additions that you'd like to make to
13 the draft today?

14 A. There are two minor changes I would like to
15 suggest, but as a way of how we got here, I would
16 say, as you asked, I had a hand, as well as other
17 members of the Division staff, in creating this
18 document. The first step was to create what we
19 called a draft set of rules, and we circulated that
20 among what we termed to be stakeholders in this, and
21 that would be folks from the taxicab industry, the
22 public motor vehicle industry in Rhode Island.

23 Actually, the insurance -- independent insurance
24 agents, I believe, got a copy, as well as the two big
25 players in the Transportation Network company. That

1 would be Uber and Lyft, and we solicited comments on
2 the draft, not the proposed draft rules. After
3 receiving probably five or six comment submissions,
4 we evaluated those comments, and determined whether
5 or not we should amend the draft rules in any way,
6 shape or form. We made a few minor adjustments to
7 the draft rules that resulted in what's before us
8 today as the proposed rules. So, then we opened the
9 proposed rulemaking with an official notice of public
10 hearing and requisite comment period that extends
11 beyond today. So, having said that, there are two
12 amendments I would propose to the proposed rules that
13 the hearing officer is going to be entertaining. The
14 first is simply a typographical error on the last
15 full page of the rules. It would be within Rule
16 5.10(a)(4), the very last --

17 Q. I'm sorry, if I could direct you again. I believe
18 it's 3.

19 A. Yes, 3. 5.10(a)(3). The second to last word
20 in that rule says, his part. It's missing a
21 lowercase T. It should be this part. Simply, a
22 typographical error. Of a little more substance
23 would be the suggestion of an amendment in
24 Rule 5.6(e). Within Chapter 14.2, there is a section
25 that escapes me at the moment, but it requires TNCs

1 to establish a written policy regarding dynamic
2 pricing, and to have that policy in writing and on
3 its website, and the statute says its application. I
4 read that to mean its app, not its application for a
5 TNC permit as -- some of the other rules refer to the
6 word application. So, this simply, for the most
7 part, would restate the statutory requirement, and
8 just add one more provision that the policy be filed
9 with the Division. So, if you'd like, I could read
10 it into the record, Mr. Hearing Officer, or --

11 THE HEARING OFFICER: Please.

12 A. So, it would be a new rule, 5.6(e), that does
13 not currently exist. It would say, All TNCs shall
14 establish and implement a written policy capping
15 dynamic pricing during disasters and relevant states
16 of emergency, and make its policy available on its
17 website, and in its web application. The policy
18 shall also be filed with the Division at the time the
19 TNC applies for its initial TNC permit, and refiled
20 with the Division upon any change, amendment to the
21 policy. So, the first sentence is verbatim from the
22 statute, with the addition of the hyphenated web
23 application, and the second sentence simply says that
24 the Division would like that filed with us one time,
25 unless there's changes made to it; and if and when

1 there are changes, that it be resubmitted to us. So,
2 I would propose that as an additional --

3 THE HEARING OFFICER: Thank you.
4 Perhaps we should make some copies of that, and
5 anyone that would like a copy should get a copy.

6 MR. MERCER: I made a number of copies
7 of all the rules, and they're stapled together in the
8 back of the room. This proposal is the last page to
9 those rules. Do you want this copy?

10 THE HEARING OFFICER: Yes. Let me
11 just -- for the record, I want to mark the proposed
12 rules, proposed file rules as Division Exhibit 1.

13 EXHIBIT 1 (DIVISION'S) MARKED FULL

14 THE HEARING OFFICER: And that exhibit
15 reflects the typo correction that you alluded to
16 earlier, and this supplement -- this proposed add-on
17 to the final rules, we'll call it Division Exhibit 2,
18 both full exhibits.

19 EXHIBIT 2 (DIVISION'S) MARKED FULL

20 Q. Mr. Mercer, that's the extent of the additions or
21 changes you have to Exhibit 1?

22 A. Yes.

23 Q. Okay, thank you. I think you provided a nice brief
24 history of how we got here today, and, of course,
25 we're here to hear public comment. Is there anything

1 additional that you'd like to add today before we
2 hear from the public?

3 A. I don't think at this time.

4 MS. HETHERINGTON: Mr. Hearing
5 Officer, if I could just simply reserve, or have him
6 at the ready, if there's any questions or any
7 responses that are necessary. Beyond that, I think
8 we're all set.

9 THE HEARING OFFICER: Thank you. That
10 works well. At this point, I'd like to open it up
11 for public comment. I think, Mr. Mercer, you have a
12 list of those who have indicated an opportunity to
13 offer public comment.

14 MR. MERCER: I do. On sheet number
15 one before you is a list of five names, and sheet
16 number two has at least one more name on it. We'll
17 get to that one.

18 THE HEARING OFFICER: I've got John
19 Signore.

20 MR. MERCER: Yes. John Signore, Jr.,
21 is the first person. Mr. Signore, if you could come
22 to the podium.

23 MR. SIGNORE: Good morning. I haven't
24 seen you in years. Actually, I was unaware of the
25 rules and regulations as they are going to be on

1 this, and I don't know what is on this compared to
2 what I'm dealing with today. This is my first time.
3 From what I've experienced through the years, I've
4 experienced no rules and regulations that I have.
5 So, I'll have to go through that to see, but I think
6 as a taxicab owner for 39 years, and driving a taxi
7 for 41 years, there's a lot of rules and regulations
8 by the state; and it seems like Uber and Lyft don't
9 have any rules and regulations compared to me. On a
10 holiday, they get -- or I don't get paid any more
11 money. I go by a meter. Everything is by account.
12 I have to -- mileage, everything has to be
13 documented. So, I see this as a none -- it's not --
14 what do you call it? It's a disadvantage for a cab
15 driver that owns a taxicab. I pay for insurance,
16 commercial insurance, and they don't. I believe if
17 an Uber or Lyft driver has a car that they're using
18 to represent the Uber or Lyft company, or whatever
19 that -- the network, they should provide insurance as
20 a commercial insurance for a vehicle. I have to.
21 It's unfair that they don't have to. So, I see a
22 disadvantage. And what's going on in the State of
23 Rhode Island is 182 taxis in the state, and Eagle Cab
24 went out of business; Woonsocket Cab went out of
25 business. There's guys that can't stay in business;

1 they can't afford it. I'm sitting at the train
2 station for hours, because I see Uber and Lyft people
3 picking up jobs. Like, wait a minute. I'm in a taxi
4 stand. People come out for taxis, but they're going
5 in Lyft, because it's convenient for them. Maybe
6 it's cheaper for them. I understand that. I think
7 it's great Lyft is there or Uber's there when I'm not
8 working.

9 I think it's a great idea. Let's have a
10 fair playing field. Let the driver of that vehicle,
11 whether it's a -- I've seen ex-POW vehicles. I've
12 seen vehicles that were from different states doing
13 the job. I'm, like, what's going on? Handicapped
14 plates doing jobs. I see bald-headed tires on cars.
15 These are all public people they're picking up.
16 They're not their friends. This is a commercial
17 business. Treat it like a commercial business. If
18 you want to do it, get the proper insurance like I
19 do. Go through the rules and regulations like I do.
20 It's unfair, and I don't think there's any reason, if
21 they want to do it, they should not cooperate with
22 that. That's how I see it. I've cooperated with the
23 state for 39 years as an owner. Terry knows. I come
24 down the last couple of years complaining. What's
25 going on? Why are they beating the system? Well,

1 just because you got a phone doesn't mean you can
2 beat the system. That's the root of all evil. It
3 helped us, and it hurt us. That's the only thing I
4 have to say, and I don't think it's fair. If you
5 want to ask me any questions, I'd be more than
6 welcome. I go by the rules.

7 THE HEARING OFFICER: Mr. Signore,
8 what I will tell you is that there was legislation
9 passed last year. I don't know if you've had an
10 opportunity to review it.

11 MR. SIGNORE: I did not review it.

12 THE HEARING OFFICER: You may want to,
13 because several of the concerns that you've
14 identified in your comments are addressed in the new
15 law. So, it's Rhode Island General Laws Chapter
16 39-14.2. Check it out. I think many of your
17 questions and concerns will be answered.

18 MR. SIGNORE: And I also think -- I
19 have a taxi plate, and people have public plates. I
20 think the state should come up with an Uber plate.
21 So, if you want to be an Uber driver as a job, have
22 an Uber plate, and then we'll see -- how many Uber
23 drivers are there in the State of Rhode Island,
24 3,000? So, there won't be 3,000 when they pay the
25 insurance like I do, and you'll see real life.

1 That's real life. So, I think we should do something
2 to make them look like you want to do this as a
3 professional job, I don't blame you. Professional
4 Lyft and Uber, I don't blame them. I think it's
5 great. When I'm sleeping, they're working. Let's be
6 in the same playing field. Don't put me out of
7 business. Thank you.

8 THE HEARING OFFICER: Okay, Mr.
9 Signore. Thanks very much for your comments this
10 morning.

11 Mr. Mercer, next speaker.

12 MR. MERCER: Temilola Sobowale. Did I
13 get that right?

14 MS. SOBOWALE: Yes. Good morning,
15 distinguished members of the Division of Public
16 Utilities and Carriers. My name is Temilola
17 Sobowale, and I'm pleased to provide the Division
18 with testimony on behalf of Lyft. Let me begin by
19 thanking the PUC for its hard work in crafting the
20 proposed rule. We appreciate this opportunity to
21 provide testimony, and present a high level overview
22 of our thoughts and concerns, and we'll follow up
23 with a more in-depth summary with our written
24 comments to the PUC the following week. Lyft was
25 founded with the mission of improving lives by

1 offering the world's best transportation. In fewer
2 than five years, we have proven to be a powerful
3 driver of positive change by embracing public
4 transportation, connecting communities, reducing
5 drunk driving, and empowering citizens with economic
6 opportunities. Based on this experience, we have
7 identified the following concerns with the proposed
8 rule: First, the PUC's expansion of criteria that
9 could disqualify drivers presents serious issues of
10 social and criminal justice, and lacks due process.

11 Lyft has serious concerns about the
12 PUC's proposal to expand the criteria that could
13 disqualify drivers who would otherwise pass a
14 background check as outlined in the TNC statute.
15 Specifically, the PUC's proposed rule would allow the
16 PUC to impose an immediate suspension on drivers
17 deemed to have a criminal conviction or adjudicated
18 traffic violation that could constitute a danger to
19 the public. The Rhode Island General Assembly
20 carefully determined the types of offenses that could
21 prohibit a driver from providing TNC services.
22 Further, over 40 state legislatures across the
23 country have debated and settled on similar language
24 that strikes the right balance between ensuring trust
25 and safety in the industry, while also expanding

1 economic opportunities to as many people as possible.
2 We are concerned that the language being proposed by
3 the PUC would disrupt this tested balance. Not only
4 does the PUC's expanded criteria limit economic
5 opportunity for drivers who pass an extensive
6 background check, but the PUC fails to provide
7 drivers with reasonable notice or opportunity to be
8 heard.

9 Unlike the disqualified criteria set
10 forth in the TNC statute, drivers would have no
11 notice of the types of offenses that would disqualify
12 them from providing TNC services. Lyft stands by our
13 background checks. The safety of our community, and
14 the million-plus rides we complete each day is Lyft's
15 top priority, and we have worked hard to design
16 policies and features that protect both drivers and
17 passengers. Therefore, Lyft proposes that the PUC
18 strike the proposed discretionary requirement.

19 Also, the PUC's proposed daily driver's
20 list will be prohibitively onerous, and is not
21 tailored to a specified purpose. The proposed rules
22 require TNCs to provide the PUC with a daily list of
23 all drivers on the platform. The stated purpose of
24 this list is to ensure TNCs are completing the
25 background checks required by the TNC statute.

1 However, receipt of a daily driver's list that merely
2 provides identifying information about a driver does
3 not accomplish this goal. Instead, it poses a
4 serious threat to data security, personal privacy,
5 and industry competition. Such requests are duly
6 onerous, and would also be prohibitively expensive.

7 The PUC's proposed rules already contain
8 a rule that would accomplish the stated goal of
9 ensuring adherence to the background check
10 requirement Section 5.4(d) of the proposed rule
11 requires that TNCs certify to the PUC that a TNC
12 driver continues to satisfy all prescribed background
13 check requirements. Unlike the daily drivers'
14 list, this provision does further the goal of
15 ensuring TNCs are completing the required background
16 check, and does so without the risk to personal
17 privacy and industry competition that wholesale daily
18 transfers of sensitive data would cause. Such
19 massive daily data transfers pose certain cyber
20 security risks. Specifically, the risk of data being
21 breached or manipulated to violate TNC driver's
22 personal privately, or to impede industry
23 competition. Given the huge burden and the risks
24 that would result from this daily reporting
25 requirement, Lyft proposes that the PUC strike the

1 provision requiring daily drivers' lists. Absent
2 careful consideration revision, Lyft believes that
3 the proposed rules as written could cause real
4 economic hardship to drivers who are denied the
5 ability to drive. Fifty percent of Lyft's drivers
6 use earnings for basic necessities, such as rent,
7 groceries and healthcare. We do not think it is the
8 PUC's intent to deny citizens this important and
9 vital economic opportunity, and so we look forward to
10 working together to ensure that Rhode Island is an
11 example of safety and social justice. Thank you very
12 much for your time.

13 THE HEARING OFFICER: Thank you for
14 your comments.

15 MS. HETHERINGTON: As a follow-up, I
16 think Mr. Mercer had a question regarding which -- in
17 reference to your discussion of the immediate
18 suspension and due process, we're curious to which
19 rule you were referencing, and if you want her to --

20 MR. MERCER: Is it 5.3(k)?

21 MS. SOBOWALE: Yes.

22 MS. HETHERINGTON: Thank you.

23 MS. SOBOWALE: Any additional
24 questions?

25 MR. MERCER: You realize that that

1 rule is subsequent to the background checks?

2 MS. SOBOWALE: Exactly. So, it would
3 be in addition to that. We're saying it's in
4 addition to the background check, the background
5 checks as prescribed by the TNC statute, and then
6 this provision would require additional scrutiny that
7 is outside of what is proposed by the background
8 check.

9 MR. MERCER: And how frequently are
10 the background checks conducted on the Lyft drivers?

11 MR. SOBOWALE: They're conducted
12 annually.

13 MR. MERCER: Annually, okay. So, a
14 jurisdiction of a state, or any other jurisdiction
15 regulating TNCs in that jurisdiction would have to
16 wait perhaps as much as much as 51 weeks before they
17 understood that there was a serious problem?

18 MS. SOBOWALE: No. I mean, you'll see
19 from our written comments when we provide them, we
20 provide the provision to -- as outlined in the TNC
21 statute, whereby a TNC driver would be required to
22 report any plea, conviction or violation, which is
23 the language as outlined in the statute that also
24 would cause a TNC driver to be disqualified.

25 MR. MERCER: So, if there was some

1 sort of an adjudication or a citation between
2 onboarding and the next annual review, they would be
3 required to report it to Lyft?

4 MS. SOBOWALE: They would be
5 required --

6 MR. MERCER: -- or any TNCs that he or
7 she drives for?

8 MS. SOBOWALE: I think it requires
9 them to report it to either the PUC and the TNCs as
10 well. So, it would still require the reporting. It
11 would just be the reporting of the specific
12 conviction, violations and pleas that are also
13 outlined in TNC statute that TNC drivers are
14 prohibited from driving for the TNCs if they've been
15 convicted of those specific violations.

16 MR. MERCER: Thank you.

17 THE HEARING OFFICER: Thank you.

18 MS. SOBOWALE: Thank you very much.

19 THE HEARING OFFICER: Next?

20 MR. MERCER: Tom Maguire from Uber.

21 MR. MAGUIRE: Good morning. First of
22 all, thank you for the opportunity to discuss the
23 impact of the rules you have drafted to regulate
24 transportation network companies here in Rhode
25 Island. I'm Tom Maguire, general manager of Uber

1 here in New England. Uber launched in Rhode Island
2 in 2014. Over the last three years, we have helped
3 connect tens of thousands of people to a new,
4 flexible way to earn money, while creating an
5 affordable, reliable way for thousands of Rhode
6 Island residents and visitors to get around. Last
7 year, lawmakers in Rhode Island took a significant
8 step in passing legislation that embraced
9 ridesharing, creating a permanent home for Uber here
10 in the Ocean State, and now as you continue the
11 process of rulemaking, we ask you to consider changes
12 to the proposed rules. These changes will ensure
13 that the regulations are clear in their application,
14 and consistent with the regulatory framework. Uber
15 currently requires that someone seeking to partner
16 with us must either be a registered owner of the
17 vehicle, or an insured on the personal auto policy
18 insuring that vehicle. By doing this, we guarantee
19 that the individual is authorized to use the vehicle,
20 which is the term adopted by statute here in Rhode
21 Island. The proposed regulations add a requirement
22 that the TNC, or the TNC driver obtain written
23 authorization from the owner of the vehicle to use it
24 to provide TNC services. This requirement was not
25 included in the bill passed by the legislature.

1 This additional step was also considered and rejected
2 by those organizations representing approximately
3 95 percent of the personal lines insurance industry
4 when they braced the model insurance term with Uber
5 and other TNCs, and it was further rejected by the
6 National Conference of Insurance Legislatures when
7 they wrote the model law, which has been passed by
8 over 40 states in the country.

9 In addition to imposing a requirement
10 not adopted in the statute, the current draft
11 language is confusing, and could be subject to
12 misinterpretation. We ask that you reconsider this
13 provision to align with the legislative intent. We
14 are also concerned with the driver hour requirement
15 in proposed regulations. The current proposal is
16 inconsistent with the legislative intent, overly
17 burdensome, and unworkable. The TNC model is
18 designed to afford independent contractor drivers
19 flexible earning opportunities on a driver's own
20 schedule and terms. Many individuals who use Uber's
21 app set their own schedules, and drive on the app
22 around other activities in their lives. Requirements
23 that set blanket limits on driver hours, and which
24 require TNCs to enforce those requirements on drivers
25 run counter to the flexibility that promote a risky

1 mentality focused on pushing through a shift,
2 unintentionally disincentiving breaks. In
3 additional, requiring drivers to report time spent
4 driving on one TNC to another TNC would unnecessarily
5 intrude each driver's private life, while providing
6 little safeguards against the risk of drowsiness.

7 Finally, a driver hour requirement is beyond
8 the scope of the legislation, and outside the
9 statutory framework the legislature adopted.
10 Insufficient sleep is a universal public concern, and
11 the only proven remedy is adequate rest. This is
12 better and more efficiently addressed through
13 technology and driver education that we regularly use
14 to help raise awareness about the importance of not
15 driving while tired. Via an in-app notification,
16 drivers are periodically reminded what the experts
17 say, and directed toward additional resources,
18 including our community guidelines. We respectfully
19 request you reconsider the proposed approach to
20 addressing driver hour limits to better reflect the
21 flexible nature of TNCs, and the role of technology
22 in keeping riders and drivers safe.

23 Lastly, the proposed rules include a
24 number of provisions that would significantly impact
25 driver privacy without a positive impact on safety.

1 We urge the Division to consider safety to be its
2 guiding principle, and to avoid unnecessary intruding
3 on driver safety where there would be no true safety
4 benefit. Requiring TNCs to provide a driver list, as
5 well as complaint tracking and driver log-in through
6 the app are overbroad and burdensome without a safety
7 upside. In regard to rider and driver safety,
8 ridesharing technology has improved transparency and
9 accountability in the way Rhode Islanders move around
10 their communities with features such as two-week
11 feedback, 24/7 customer support, and the option to
12 share your estimated time of arrival with your
13 contact, among many others. The law already requires
14 TNCs to respond to inquiries from the Division, and
15 maintain records of trips each driver performs. The
16 proposed rules are cumbersome and unnecessary in
17 light of existing law, and would significantly
18 intrude into the privacy of drivers.

19 Finally, we appreciate the opportunity
20 to weigh in on these important issues that have the
21 potential to impact the technology, and that has
22 changed the way our cities and towns here in Rhode
23 Island move. The proposed rules go beyond the intent
24 of the legislature, and we encourage the Division to
25 finalize the rules that support the innovation,

1 economic opportunities and growth, while ensuring
2 both rider and driver safety. Thank you so much.

3 THE HEARING OFFICER: Thank you,
4 Mr. Maguire.

5 MS. HETHERINGTON: Mr. Hearing
6 Officer, a couple of issues were brought up by Mr.
7 Maguire. If we could reserve at the end of the
8 public comment just to -- if Mr. Mercer could put his
9 input in on that additional public comment?

10 THE HEARING OFFICER: Yes, thank you.

11 MR. MERCER: The next individual, it
12 looks like Male, M-A-L-E. Is it Mark Male?

13 MR. MALE: That's correct.

14 MR. MERCER: Mark Male from the
15 Independent Insurers Association of Rhode Island.

16 THE HEARING OFFICER: I think its
17 Agents.

18 MR. MERCER: Agents of Rhode Island.

19 MR. MALE: My name is Mark Male. I'm
20 the executive vice president of the Independent
21 Insurance Agents of Rhode Island. The organization,
22 we are independent businessmen or women who own their
23 own business around the State of Rhode Island, and
24 we've had an ongoing concern about the TNC
25 legislation. So, I have a couple of comments. We'll

1 give additional comments and get them in prior to the
2 July 28 deadline; but, basically, there are two items
3 I'd like to touch on, and I wish Ernie Shaghalian,
4 who's our chairman of our Government Affairs
5 Committee, were here to do this, but he's in Hawaii,
6 so here I am. First of all, for the financial safety
7 of the public, it is important that the DPUC require
8 the insurance maintained by TNCs be public
9 information. Right now, TNCs can use surplus lines
10 insurance to insure their vehicles. Surplus lines is
11 not regulated by the state. It's unregulated.
12 There's two types of companies in the marketplace,
13 admitted and nonadmitted. Surplus lines fall under
14 the nonadmitted. Surplus lines nonadmitted companies
15 are not regulated by the Department of Business
16 Regulations; and, as such, we have no assurances
17 relative to the scope of coverage limits, that sort
18 of thing.

19 TNCs should be required to maintain a
20 certificate of insurance with the DPUC, just as the
21 taxis do, and that information should be public
22 without open records to the public. If someone
23 sustains damage, or is injured in an accident in a
24 TNC vehicle, they may or may not be able to determine
25 who the insurance carrier is. If a certificate of

1 insurance is filed with the DPUC, at least there
2 would be some level of assurance that they be able to
3 find out who the insurance carrier is. Secondly, I
4 heard the gentleman from Uber say that named insured
5 or an insurer on a policy constitutes authority to
6 use that vehicle. One of our biggest concerns is
7 that the legislation does not address the vehicle
8 owner. We have circumstances where individuals have
9 children, offspring in college. They -- and this
10 actually happened -- they call home and say, Hey, I
11 made some money this weekend. And they're, like,
12 Well, how did you do that? I used the car and did
13 Uber, and they're, like, Oh, my God. I need to know
14 about this. That's one of our primary concerns. The
15 TNCs should be required to insure both the owner of
16 the vehicle, as well as the driver. It is not that
17 specific. I believe I'm correct on that. TNCs
18 should be required to provide the TNC and insurer
19 disclosure requirements as mandated by law directly
20 to the vehicle owner, and that's where the disconnect
21 is for us. We're mostly concerned about the owners
22 because of the insurance issues. If they're unaware
23 of its use -- even though I may be on my father's
24 policy, and I drive my car, but if he's unaware that
25 I'm using it for business purposes to make money, and

1 something happens, he's on the hook, because he's the
2 named insured on the policy, and I'm absolutely
3 within my range of being able to use a car, but I
4 didn't clear it with the owner. So, that's our main
5 concern. The draft regulation allows for either or
6 both should be required for the financial safety of
7 the public. So, in a nutshell, our two concerns
8 again are that there should be further regulation, or
9 at least oversight in terms of surplus lines, and at
10 a minimum, there should be a certificate filed with
11 the DPUC for the TNC drivers; and, secondly, that
12 there ought to be notification to the vehicle owner,
13 not just the driver, who may be an insured under that
14 policy. Thank you.

15 THE HEARING OFFICER: Any questions
16 for Mr. Male?

17 MS. HETHERINGTON: Thank you, no.

18 MR. MERCER: There's one more
19 individual on this sheet. His name is Michael
20 Tartaglione.

21 MR. TARTAGLIONE: Good morning. My
22 name is Michael Tartaglione. I'd like to touch on a
23 couple of items. First of all, good morning,
24 Mr. Hearing Officer. I've been in the industry for
25 quite a number of years as a driver and an owner;

1 and, obviously, I've always been, you know, pretty
2 outspoken how I feel, and how I think things should
3 be, and a lot of people have seen about 40 some-odd
4 years of that, so I apologize if I'm redundant.

5 Obviously, the rules and regulations here submitted
6 are -- in my opinion, are wonderful. I support the
7 Public Utilities in trying to make some sort of
8 regulation for competitors of an industry that has
9 been broken wide open. At one time, we were 300 or
10 400 driver operators in the state, and I believe Uber
11 said they launched in November. They actually
12 launched in October of 2013 in Rhode Island, I
13 believe was the first job. Since that launching,
14 it's been very, very difficult for public motor
15 vehicle companies and taxis to operate on an even
16 playing field.

17 So, although these rules, in my opinion,
18 do fall a little bit short, I'm a big advocate of --
19 because we need to have some sort of regulation. We
20 need to have accountability, and if you notice that a
21 couple of the comments from Lyft and Uber, who spoke
22 so eloquently, and they are; but their business plans
23 are motivated by greed and dollars. However, the
24 Public Utilities and the legislators, we're more
25 motivated on our balance sheets for safety and the

1 welfare of the public, and they're two very, very
2 different balance sheets and, obviously, two big
3 things when making these rules and regulations going
4 forward. So, my opinion, I mean, again, I believe
5 that if you look at some of the insurance quandaries,
6 to say the least, and some of the regulations of the
7 vehicles, there's a lot here the Public Utilities
8 certainly can do in kind of roping these people in,
9 and getting a better balance on it, which is really
10 going to be the benefit, not only for the people that
11 have been doing this for a number of years, although
12 people evolve; I understand. The taxi industry could
13 be a dinosaur. It probably is a dinosaur in a lot of
14 towns and cities, but it's not quite that here, and
15 we still have a real good participation, and we have
16 a real good opportunity. Just let things be a little
17 more even. An even playing field is established by
18 the rules and regulations, and the longevity of the
19 public, the safety of the public will be secure. If,
20 in fact, we're allowed to be pushed out by companies
21 that are able to make substantial more dollars
22 because their business plans are crafted better --
23 these people have geniuses that are working for these
24 multi billion-dollar companies. Not that we don't
25 have geniuses here in Rhode Island -- we could be

1 outgunned. If we allow these companies to take over
2 take over in a very, very short period of time,
3 they'll be the only companies out there doing
4 business, and they will be wrangling it any way they
5 want. The prices will go through the roof. The
6 regulations will be limited, and it will be a
7 free-for-all, and there's not a lot that small state
8 agencies will be able to harness any longer if you
9 allow these multi billion-dollar companies to grow
10 any larger. So, again, my opinion, you know, I would
11 like to see these rules adopted. I'm in favor of any
12 negotiations that take place to make it just a little
13 bit more regulatory for them, and to allow the
14 current, you know, atmosphere and climate out there
15 of the taxis and public motor vehicles to kind of
16 operate on an even playing field.

17 THE HEARING OFFICER: All set?

18 MR. TARTAGLIONE: Yes.

19 THE HEARING OFFICER: I have to say,
20 in 33 years, I think that's the briefest set of
21 comments you've ever offered.

22 MR. TARTAGLIONE: It's been a lot of
23 years, my friend.

24 MR. MERCER: There are two people
25 listed on sheet two. The first is Abdul Aileru. I'm

1 sure I didn't pronounce that correctly.

2 THE HEARING OFFICER: You're going to
3 have to state your name and spell your name for the
4 record, please.

5 MR. AILERU: My name is Abdul Rahaman
6 Aileru, A-B-D-U-L, R-A-H-A-M-A-N, A-I-L-E-R-U. I'm
7 here this morning from a standpoint of being a
8 nonemergency transport provider in the state. I'm a
9 resident of the state; and, sincerely speaking, given
10 the rules that I read through, some of the proposals
11 include that private individuals will be utilized for
12 services in the states; and at this point, being a
13 nonemergency transport provider in the state, I deal
14 directly with a broker in the state, and one of my
15 main concerns is the PUC right now is giving choices
16 as to the use of other online services that include
17 the likes of Uber and Lyft. I looked at it, and some
18 questions ran through my mind, which includes -- I'm
19 standing here right now at this moment speaking for
20 all of the members of my institution (sic) that also
21 is getting our business.

22 So, the question that run through my
23 mind includes the overhead cost. Before now, the
24 PUC, they indicated having insurance of 1.5 million,
25 just the coverage, and a breakdown of that runs into

1 several hundreds of dollars every month, and not just
2 that. You are mandated to have insurances and
3 Workers' Compensation for your workers. So, what
4 does that tell us? You want to give choices to
5 people. How do we, in a way, save costs to Rhode
6 Island taxpayers without sacrificing jobs on
7 unemployment to residents? The way it is right now
8 is I work directly with a broker. Well, I guess the
9 situation right now is that we're not talking about
10 the broker; we're talking about having a TNC. How
11 does that work? For riders, we need rides to make
12 medical appointments. Trust me, it leaves us in a
13 situation where jobs and employment is compromised.
14 So, I just ask PUC to think, and, hopefully, jobs and
15 employment can be sustained to residents in the
16 state.

17 Before I leave, before now, the use
18 of -- none of my transport provider has been
19 undertaken by the state itself before the advent of a
20 broker (sic), although we're not talking that right,
21 but in a sense, it kind of trickles down to that; and
22 it's something I would like the state to again
23 consider.

24 So, my argument is that the rationale
25 for bringing in the Lyft and Uber, it needs to be

1 well thought out, and -- well, I guess a proposal's
2 already been made, and we don't have more to say, but
3 I would just rather defer to the PUC to consider
4 saving jobs and employment for residents of the
5 state. Thank you, sir.

6 THE HEARING OFFICER: Thank you.

7 MR. MERCER: The last individual to
8 sign up is Mr. James Oisamaiye.

9 MR. OISAMAIYE: My name is James
10 Oisamaiye, O-I-S-A-M-A-I-Y-E. My main point here --
11 first of all, thanks to Terry Mercer. I'm a taxi
12 driver. I know Mr. Mercer has been trying a lot to
13 bring Uber and Lyft to the table of controlling their
14 drivers and their business, because when Uber came to
15 this state, they did not register with the State of
16 Rhode Island. Uber and Lyft, they just came in
17 without no decision, no office, nothing. They did
18 not care for the State of Rhode Island when they came
19 in. I'm a taxi driver. It's kind of logistic job,
20 because you have to give care for the people you are
21 giving rides to. Uber and Lyft, like the lady said
22 just now, their drivers don't have no insurance.
23 Their cars are not in good order. We're the taxi
24 drivers. We're the taxi companies in the state. We
25 are being regulated by PUC. They check our

1 insurance; they check our vehicles, and they make
2 sure they check our background. Like the lady from
3 Lyft said, there should be no background checks.
4 That is not good for the State of Rhode Island,
5 because you -- as a passenger, you want to make sure
6 you are safe in any car you are. You don't know if
7 the driver is armed robber, if it's a drug dealer, if
8 it's a drunk driver, or the kind of person he is. We
9 know Uber and Lyft, they have come to stay, but the
10 regulation the PUC have put together is welcome,
11 because the safety of the Rhode Islanders is very,
12 very important, because we need safety for the people
13 of Rhode Island, even for the visitors, for the
14 people that are coming here. What if their car break
15 down on the road, if the car is not good, if it
16 breaks down in the road?

17 Uber said they have insurance for the
18 driver. No. There is many occasions something
19 happen, where they call Uber. Uber say, call the --
20 what if the driver has no insurance? There are
21 statistics to show this one all over the world. Most
22 of the drivers don't have no insurance. So, it will
23 be good if the state can be allowed to go into Uber
24 database, Lyft database so they can check the
25 drivers, they can check the cars, and they can check

1 the insurance. They do that to us. We are the taxi
2 drivers, the regulators. For Uber and Lyft to say
3 they don't want to be regulated, that is not good for
4 the State of Rhode Island, and that is not good for
5 the cities of Rhode Island, and that is not good for
6 the visitors coming to this state. Please, I would
7 ask you to let PUC go into database of Uber and Lyft
8 to make sure all the drivers, their documents are in
9 order, their vehicles are in order, their insurance
10 are in order. Like the gentleman Mark just said just
11 now, Uber said they have general insurance for all
12 their companies, but when something happens, they are
13 not there for it. So, who's at loss? It's the
14 passengers; it's the visitors. Please let PUC --
15 allow PUC to go into Uber and Lyft database to make
16 sure the drivers are -- their background are okay,
17 their cars are okay, and each driver, each car have
18 insurance, because some of them, they don't have no
19 insurance.

20 Please, let -- PUC should be able to
21 make sure any driver they hire, they should bring the
22 document to PUC to make sure that they have good car,
23 they have insurance, and the driver's background is
24 okay. Please, if you can do this, that would be very
25 fine for the State of Rhode Island, for the citizens,

1 and for the people taking Uber. Uber and Lyft are
2 here to stay, but they should be regulated. Thank
3 you, sir.

4 THE HEARING OFFICER: Thank you, sir.

5 MR. MERCER: I think that's it.

6 THE HEARING OFFICER: Is there anyone
7 else in the back of the room that would like to offer
8 public comment this morning? Let me note for the
9 record that the -- sir, do you want to offer a
10 comment? Come forward. Just state your name, and
11 spell your name, please.

12 MR. ADESINA: My name is Kay Adesina,
13 K-A-Y, A-D-E-S-I-N-A. The problem I do have with
14 this new TNC program is, like, I'm a PMV owner. As
15 one of my colleagues has said, we working for a
16 broker. Right now, we are having a problem with the
17 broker. Every PMV owner have 1.5 million liability
18 insurance to stay in the business, to go all through
19 the procedure of Rhode Island state; but a TNC, I
20 don't think they should have -- there's no 1.5
21 liability insurance or anything on their paperwork.
22 The problem we are having now -- I have four vans.
23 It's only two vans working for the past three months,
24 because the broker, right now, they are using Lyft,
25 and Lyft is more cheaper to them, and they confronted

1 us that, you know what? We're using Lyft. Whatever
2 you want to do, come and do it, but if you want to
3 come on the table and renegotiate your price, it's
4 fine; but I cannot negotiate my price if I have to
5 pay 1.5 million on each van, but the person on Lyft
6 is on the road doing the same business, and doing --
7 running lower costs, not my own costs. So, going
8 down the road, maybe in a year now when this thing is
9 approved, I will be out of business, and there's
10 nothing I could do. That means I have to file
11 bankruptcy, because on -- before you could have a PMV
12 license, you must have a car four years old. On the
13 TNC, it's not the same thing. So, there is a lot of
14 pros and cons I want you guys to look into before
15 passing this law out, because if this happen, that
16 means we have to drop off our PMV license, and go for
17 TNC business, and start doing business that way. We
18 don't need to pay any insurance. We don't need to do
19 any Workers' Comp, as one of my colleagues said,
20 because right now, the broker is using Lyft. We
21 don't have anything to say, because they said, yes,
22 we could use Lyft for the same business we are doing.

23 So, I would like you to examine this
24 before putting this thing out to the public. As the
25 gentleman said, he said a kid could take his father's

1 car and run a business for a week and say, I made
2 \$300 without no bills, just to get gas. While I'm
3 running a business, I have to pay my employee, pay
4 the Workers' Comp company, pay the TDI, and pay a lot
5 of things. So, I'll be working on deficit. Why
6 someone on the same business, doing the same thing as
7 me would be walking away with a lot of profits. So,
8 I would like you to examine this well to see the best
9 route to go on this TNC business, and looking at the
10 PMV people, too, what it affects us in this business,
11 because if this goes through, a lot of PMV owners,
12 they are ready to drop off their PMV license and go
13 to that route, which is not good for the state. So,
14 if the broker is not using Lyft, and PMV is doing the
15 same thing the Lyft people are doing without
16 screening nothing, and we have to do a lot of
17 background checks, a lot of training for our drivers
18 before they could come on the road to work as a
19 PMV chauffeur driver, it is just going to be a
20 serious problem for Rhode Island business people.
21 Thank you.

22 THE HEARING OFFICER: Thank you, sir.

23 Anyone else?

24 MR. SIGNORE: Can I come up again,
25 please?

1 THE HEARING OFFICER: Sure. Mr.
2 Signore, you want to supplement your comments?

3 MR. SIGNORE: I want to add I was very
4 happy to see that the insurance commissioner is here,
5 and that really shows us where he's coming from
6 because I think it was a great idea that the -- to
7 see the commissioner here to say that he's not
8 allowing, or the state shouldn't allow these people
9 to operate their own vehicles the way they do. So,
10 they're telling you, the state, that it's not legal.

11 THE HEARING OFFICER: Just for
12 clarification, Mr. Male is not the insurance
13 commissioner.

14 MR. SIGNORE: What is he?

15 THE HEARING OFFICER: He is from the
16 Independent Insurance Agents of Rhode Island.

17 MR. SIGNORE: You're right. I would
18 imagine what the commissioner might say, you know,
19 because, actually, you know, to do stuff, and to be
20 allowed to be in commercial business, you have to do
21 a commercial thing; and like I said, I'm not against
22 Uber, and I want to see them, but I can't change my
23 prices, and if it's a busy time of the day, they go
24 from a \$50 fair to a \$150 fair. They can charge
25 whatever they want. To me, that doesn't seem right.

1 If you take people for 50 one day, and the next time
2 it's a busy time for them, so they'll charge you 150,
3 three times the amount. So, I don't know where the
4 regulations or not regulations come in, but I think
5 Public Utilities should have some type of say in how
6 we run the state. I don't think Uber or Lyft should
7 be allowed to tell us how we should run it. I think
8 we should tell them how they should be run. It's not
9 fair, and it should be done fairly for everybody. If
10 you want to drive for Lyft, beautiful. Do it the
11 right way. If you want to drive for Uber, do it the
12 right way, and I think everybody's going to be happy.
13 We don't even need to be at a meeting. Get an Uber
14 plate. Put it on your car. Get Uber insurance. I'm
15 sure their insurance companies would love to insure
16 you. Now it's proper. I don't see a problem with
17 that. We got taxi public plates. We got everything.
18 So, I think that's what the main reason is, and I
19 think when it first came into Rhode Island, I seen
20 it, and I said, It won't work here, because it's not
21 a taxi state (sic). It really isn't, but these young
22 kids today are going on their phone, like they're
23 using them like it's the thing of the world, and I
24 don't disagree if it's cheaper, but wait a minute.
25 I'm paying 6,000 for insurance, and that's only

1 liability, and they're only paying 1,250 for full
2 insurance. So, that's the difference. Thank you.

3 THE HEARING OFFICER: Thank you,
4 Mr. Signore. So that everyone knows, the comment
5 period closes on July 28. So, anyone wishing to
6 offer written comments can do so up until July 28.
7 Mr. Mercer?

8 MS. HETHERINGTON: Thank you,
9 Mr. Hearing Officer. If we could offer Mr. Mercer
10 one more time, simply to complete the picture here.
11 Since many issues have been mentioned by public
12 comment, kind of if he could provide some responsive
13 comment, and maybe some rationale from a regulatory
14 standpoint, some responses to what's been elicited
15 today. I'll give him free rein.

16 THE HEARING OFFICER: Sure, thank you.

17 MR. MERCER: Thank you, Mr. Hearing
18 Officer. This is probably the best way to address it
19 so that everybody here today understands the
20 rationale behind the rules that are being proposed.
21 I'll very quickly address each of the public
22 commenters, and I'll probably do it in versus
23 fashion, since the majority of the final five or six
24 had to do with -- entirely with public motor vehicle
25 concerns and taxicab concerns, and I just want to let

1 the folks know who came to testify, the last few
2 folks, that many of the concerns that they have
3 cannot be addressed in these rules, because they're
4 not addressed in the statute. The statute set the
5 regulatory framework from which we now have to devise
6 these rules. So, some of things that you're
7 concerned about being in here, or not being in here
8 is entirely a reaction to the legislative bill that
9 was passed last year. So, some of the things -- some
10 of the redress they are seeking, the Division cannot
11 accommodate, but I just wanted to make that clear.
12 Again, going in reverse order, it was Mr. Male, I
13 believe, that raised two issues in the rules that I
14 would offer the rationale for why the Division did
15 what it did, and the first is the notification of the
16 owner of the vehicle that is being used as a TNC
17 vehicle, and it was first Mr. Maguire who brought it
18 up, and I agree -- the Division agree with Mr. Male's
19 interpretation that while an individual being listed
20 on the insurance policy may indeed be authorized to
21 use the vehicle, it is not implicit then that they're
22 authorized to use the vehicle for that purpose.

23 So, I think that's what the Division's
24 intent is, and I would hope the hearing officer would
25 take that into consideration, that that's the intent,

1 that it is not an equality that being on the
2 insurance policy when it's utilized as a private
3 vehicle is the same as authorizing it as the owner
4 for another driver, a family member, per se, to
5 utilize for for-hire transportation, that that may
6 very well affect the coverage that they enjoy.

7 Mr. Male also suggested that TNCs be required to have
8 on file with the Division a certificate of insurance.
9 That's not in the rules. That's something he's
10 suggested today. I don't know how the Division would
11 feel about it, but since we have another two weeks in
12 comment period, and Mr. Maguire indicated that
13 Lyft -- Uber will be supplementing its testimony
14 today with written comment, that perhaps they could
15 address that suggestion by Mr. Male.

16 Both of the individuals who testified on
17 behalf of the predominant players in the TNC
18 industry, Uber and Lyft, had concerns about the
19 driver -- the length of time driving concern in the
20 proposed rules, and I guess it was Mr. Tartaglione
21 that talked about balance sheets, what it is that the
22 TNCs are looking for, versus what he suggests that
23 the Division and, ultimately, state government should
24 be looking for as a balance sheet; and he indicated
25 it should lean more towards public safety. I don't

1 disagree with that at all. I think that's why we're
2 here today. If it weren't for us fleshing out the
3 statute through this rulemaking purpose, we could
4 simply have just relied on the statute to be all it
5 is. Having said that, I think driving times of
6 individuals behind the wheel, transporting passengers
7 for hire is a very big safety concern, and I would
8 ask that the hearing officer take administrative
9 notice of a U.S.A. Today article that talks
10 specifically, or highlights specifically some safety
11 concerns regarding TNC drivers and length of time
12 either on the app, behind the wheel, or whatever the
13 case may be.

14 MS. HETHERINGTON: Mr. Mercer, do we
15 wish to -- the Advocacy Section would wish to present
16 that on record, and perhaps make copies for anyone
17 wishing to have a copy?

18 MR. MERCER: Sure, I have a copy. If
19 you think it should be introduced as Division
20 Exhibit 3, I'd be happy to provide it that way.

21 THE HEARING OFFICER: Yes.

22 MR. MERCER: In that case, I will give
23 it back to counsel.

24 THE HEARING OFFICER: Why don't you
25 conclude your comments and do that at the end.

1 MR. MERCER: So, the only other aspect
2 I'd like to clear up --

3 MS. HETHERINGTON: I'm sorry, could I
4 just interrupt for a minute? Could you just flesh
5 out that issue a little bit? So, you're referencing
6 an article that you'll make available to everyone.
7 Can you just briefly describe what it is you're
8 referencing?

9 THE HEARING OFFICER: Why it's
10 relevant.

11 MR. MERCER: It's relevant, because it
12 appears that, according to this article -- and I'm
13 sure Uber and Lyft will be able to weigh in and
14 dispute if need be, but part of the article indicates
15 that there are unintended incentives perhaps to
16 drivers spending more time behind the wheel than is
17 safe, for financial purposes, whether it's reaching a
18 goal of number of rides, or reaching an amount in a
19 shift, if you will, in order to make it worth their
20 while to drive. So, that's the long and short of it,
21 that while there very well may be some technological
22 advantages that Uber and Lyft can put through their
23 app to indicate that the driver should take a break
24 here and there, and that there is no better solution
25 than adequate rest, as Mr. Maguire said, this would

1 seem to indicate that there are some hiccups in the
2 technology that would more or less incentivize
3 someone to stay on the road on the app, transporting
4 passengers for hire, when they probably would be
5 better served getting that adequate rest that
6 Mr. Maguire mentioned. That's the long and short of
7 it.

8 MS. HETHERINGTON: Can you just
9 elaborate? Is the 12-hour requirement consistent
10 with other means of interstate transportation that
11 you regulate? Is there also a requirement for
12 other --

13 MR. MERCER: For intrastate.

14 MS. HETHERINGTON: Intrastate, excuse
15 me.

16 MR. MERCER: Intrastate for public
17 motor vehicles and for taxicabs, those are the two
18 primary industries where drivers are transporting
19 passengers for hire, there is a requirement of no
20 more than 12 hours in a shift, or in a length of time
21 driving, unless it's separated by a full break of not
22 less than eight hours; and as you mentioned, for
23 interstate, it's the same for property carriers and
24 passenger carriers, that it's a long standard
25 regulatory practice to limit the hours of operation.

1 We have -- this is a new phenomenon,
2 because those people have always traditionally been
3 in that field. They've been professional drivers.
4 Whether it's driving a motor coach, or a
5 tractor-trailer, or a taxicab, or a limousine, that's
6 been the job. This is a new animal. This is
7 somebody driving at different times, on mothers'
8 hours, perhaps after a full shift of working
9 anywhere, in a 12-hour shift working someplace.
10 It's -- I guess the point I'm trying to make is that
11 the Division absolutely must be concerned with driver
12 fatigue when people are holding themselves out to
13 transport unwitting individuals for compensation.

14 THE HEARING OFFICER: Thank you. Does
15 that wrap it up?

16 MR. MERCER: The only other issue I
17 wanted to address, and I thought by doing it this way
18 that the Lyft representative, when they submit their
19 supplemental comments, might be able to further
20 address it, but we had a little bit of back-and-forth
21 about the rule that would require drivers to notify
22 the Division of adjudicated traffic violations or
23 criminal matters, things of that nature, and the
24 reason -- the rationale behind it is that the
25 onboarding, if that's the term that they use for

1 bringing new drivers on, and they do the background
2 check, for example, one of those -- I guess the
3 concern is that -- this was articulated by Lyft -- is
4 that we should be sticking to just what the criteria
5 are in the statute; but, for example, one of the
6 criteria in Rule 5.3(b)(1) -- I think it's
7 5.4(b)(1) -- indicates that in order to get on the
8 road as a TNC driver through the third-party
9 background check, has not had more than three moving
10 violations in the prior three years. Well, if they
11 had two moving violations, and they got one three
12 days after being onboarded, that would constitute
13 three, but we wouldn't know until 12 months later
14 when they are recertified, or the background check is
15 redone. I don't know that Uber does annual
16 background checks. They certainly would be able to
17 supplement that in their additional commentary, but
18 the indication from the Lyft representative was they
19 do theirs annually, and the short fact of the matter
20 is that we need to know more frequently than every
21 12 months if somebody has been involved in a serious
22 traffic infraction, or habitual traffic infraction,
23 because previously, they did not get two or three
24 moving violations in a period of time, because they
25 weren't driving as frequently. They were going to

1 and from work, and to and from the grocery store.

2 Here now, we've added some sort of
3 incremental increase in their time on the road, and
4 perhaps an urgency on getting to and from jobs, it's
5 very likely that somebody could accumulate some bad
6 habits, and a number of driving infractions that the
7 Division would find to be problematic. Same thing
8 with a criminal matter. You know, I mean, we require
9 this of other passenger carriers. It just makes good
10 regulatory and good governmental sense to require it.
11 Those are just a few of the things -- the comments
12 that came up, and I just figured that since those
13 individuals were going to be offering supplemental
14 comment, they'd have a better idea of the rationale
15 behind the proposed rule, and how to respond to it.
16 So, with that, I don't know if you have any
17 questions, Mr. Hearing Officer, but --

18 THE HEARING OFFICER: No, I don't have
19 any questions.

20 MS. SOBOWALE: Would I be able to
21 respond, since you added the U.S.A. article? I just
22 wanted to highlight a specific area in the article,
23 if I could.

24 THE HEARING OFFICER: Yes, come
25 forward. We'll mark the article Mr. Mercer alluded

1 to as Division Exhibit 3. That would be a full
2 exhibit.

3 EXHIBIT 3 (DIVISION'S) MARKED FULL

4 THE HEARING OFFICER: Do you want to
5 just reidentify yourself for the record?

6 MS. SOBOWALE: My name is Temilola
7 Sobowale. I'm representing Lyft. I want to start by
8 clarifying that Lyft, you know, fully supports
9 driver -- understands the importance of driver
10 fatigue, and from the outset, we have implemented
11 caps on the number of hours the drivers can be on the
12 road. I think from our previous written comments, we
13 outlined to the PUC that our concerns were with the
14 manner in which the PUC calculated the amount of time
15 that they would limit TNC drivers. Specifically, the
16 proposed rules as written limit drivers according to
17 the period of time they have access to the TNC
18 platform, as opposed to the actual time that TNC
19 drivers are giving rides, which we found to be a
20 better metric, because TNC drivers, for instance, in
21 most cases, may be waiting at home, or be waiting in
22 the office, and are not necessarily on the road
23 providing rides; and in the U.S.A. Today article,
24 which I believe you're referencing, which is by Diana
25 Kruzman, you know, she talks about how drivers for

1 other TNCs are not necessarily capped with respect to
2 the amount of time they can give rides, and notes, By
3 contrast, rival Lyft shuts off its app, which drivers
4 need to find customers, after 14 hours at a time, and
5 doesn't let drivers back on for six hours to let them
6 rest. So, Lyft has taken, you know, the importance
7 of having driver rest. Rest time is very important
8 to Lyft, and we have taken that into consideration
9 from the outset, and that's something that's very
10 important to us, so I just wanted to stress that.

11 THE HEARING OFFICER: Thank you.
12 Certainly, if you would like to supplement these
13 comments with your written comments that you plan on
14 filing later on, you can do that as well.

15 MS. SOBOWALE: Thank you.

16 MR. MERCER: Can I make one last
17 comment?

18 THE HEARING OFFICER: Sure.

19 MR. MERCER: In response to that,
20 there is no prohibition against driving for one or
21 the other, and we keep talking about one or the other
22 being Uber or Lyft, because they're the two
23 predominant carriers, but there are frequently times
24 when drivers are logged on to both apps; and there
25 are times that they may be simply driving for Uber,

1 and then driving for Lyft, and there may not be any
2 regulatory or enforcement capability of addressing
3 that. I mean, theoretically, you could drive
4 14 hours for Lyft, and be told you cannot get back in
5 for six hours, but you could just turn on your Uber
6 app, and I know there's no way to safeguard against
7 that, but that's the unfortunate reality that we --
8 the whole intent of the rules, or that rule, in
9 particular, is for public safety; and whatever way we
10 can effectuate that and ensure that level of public
11 safety, I think the better off we are.

12 THE HEARING OFFICER: Thank you.
13 Ms. Hetherington, anything else?

14 MS. HETHERINGTON: I have nothing
15 further. Thank you for your time today.

16 THE HEARING OFFICER: Okay, thank you.
17 As I indicated earlier, the record is open until
18 July 28. This is the only hearing we're conducting
19 in this docket, but the record for comment purposes
20 will be open for a couple more -- well, another week
21 or so. So, I would encourage anyone that wants to
22 supplement their comments by submitting some written
23 comments on or before the expiration date. Thank
24 you, all, for your participation this morning, and
25 for any subsequent comments you may provide.

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(HEARING CONCLUDED AT 11:23 A.M.)

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C-E-R-T-I-F-I-C-A-T-E

I, JANINE ANDREWS, do hereby certify that the foregoing transcript is true, complete and accurate, taken at the time of the above-entitled matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 26th day of July 2017.

JANINE ANDREWS, NOTARY PUBLIC
MY COMMISSION EXPIRES: NOVEMBER 5, 2017

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