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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement Senate Bill 1376 Requiring Transportation Network Companies to Provide Access for Persons with Disabilities, Including Wheelchair Users who need a Wheelchair Accessible Vehicle.

Rulemaking 19-02-012

ADMINISTRATIVE LAW JUDGE’S RULING ON CONSUMER PROTECTION AND ENFORCEMENT DIVISION REPORT

In Decision (D.) 20-03-007, the Commission authorized the Consumer Protection and Enforcement Division (CPED) to provide a report that:

...evaluates the wheelchair accessible vehicle (WAV) response times for at least three quarters and the Offset Time Standards, including the number of Transportation Network Companies that have qualified for an offset, the qualifying standard, and recommendations for modifications to the Offset Time Standard.¹

Attached to this ruling is CPED’s report.

IT IS RULED that the Consumer Protection and Enforcement Division’s report, authorized by D.20-03-007, is attached to this ruling as Appendix A.

Dated March 30, 2021, at San Francisco, California.

/s/ DEBBIE CHIV
Debbie Chiv
Administrative Law Judge

¹ D.20-03-007 at Ordering Paragraph 7.

APPENDIX A



TNC ACCESS FOR ALL PROGRAM

Response Time Report

Consumer Protection and Enforcement Division

March 2021

Report Authors:

Anna Jew, Analyst

Reagan Rockzsfforde, Analyst

Terra Curtis, Supervisor

Jeff Kasmar, Program Manager

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EXECUTIVE SUMMARY

In compliance with the California Public Utilities Commission's (CPUC or Commission) Decision [D.20-03-007](#), Consumer Protection and Enforcement Division (CPED) staff prepared this report to evaluate the wheelchair accessible vehicle (WAV) response times submitted by transportation network companies (TNCs) in the first five quarters of the implementation of the Access for All Program. This report provides an analysis of response times data by geographic area or county and makes recommendations related to county groups, interim response time benchmarks, and the Offset Time Standard (OTS). The reporting period includes three quarters during which travel was impacted by COVID-related shelter-in-place orders; it also includes only those counties/quarters in/for which a TNC sought an offset.

The data analyzed in this report show that quarterly trends in response times vary across geographic areas. Overall, reported response times in most counties generally meet the Level 1 and Level 2 Offset Time Standard. CPED identified the following considerations to inform any future adjustments to the interim response time benchmarks and/or the Offset Time Standard in the Access for All Program:

- **The findings in this report lack comprehensive on-demand WAV response time data by county.** Collecting comprehensive data from every county where TNCs have implemented on-demand WAV service, regardless of whether an offset request was filed in that county, is essential to assessing progress toward the original goals of SB 1376 and informing reasonable response time benchmarks as part of this program.
- **CPUC does not currently collect specific information on where on-demand WAV service is offered or focused within each county.** Therefore, while the response time findings in this report suggest what is possible in specific geographies, they may or may not represent what is feasible countywide.
- **Three of five quarters' worth of data in this report represent travel periods impacted by COVID-19.** The impacts of COVID-19 significantly reduced travel statewide, particularly among vulnerable populations. While travel demand and transportation supply are inherently linked, it is unknown how response times on actual completed trips were affected by the impacts of COVID-19.

INTRODUCTION

Purpose of this Report

The California Public Utilities Commission's (CPUC or Commission) Decision D.[20-03-007](#) directed Consumer Protection and Enforcement Division (CPED) staff to prepare a report that "evaluates the wheelchair accessible vehicle (WAV) response times in one year, after at least three quarters of response time data has been submitted by Transportation Network Companies (TNCs).¹"

The Decision outlines three elements that the report must address:

1. Response Times
2. Offset Time Standard (OTS)
 - a. Number of Transportation Network Companies that have qualified for an offset
 - b. Qualifying standard
3. Recommendations on modifications to the WAV response time and Offset Time Standard²

Accordingly, this report considers county groups, response time benchmarks, and the Offset Time Standard (OTS). This report presents analysis of WAV performance data submitted by the TNCs from the third quarter of 2019 (Q3 2019) through the third quarter of 2020 (Q3 2020).

Background of TNC Access for All Program

The CPUC created the TNC Access For All Program in response to [Senate Bill \(SB\) 1376](#) (Hill: 2018), which directed the Commission to establish a program to increase the accessibility of TNCs for persons with disabilities, including wheelchair users who need a wheelchair-accessible vehicle.³ In 2019, the Commission opened Order Instituting Rulemaking (OIR) R.19-02-012 to address implementation of SB 1376.

To subsidize the costs of providing WAVs, D.[19-06-033](#) required TNCs to collect an "Access Fee" in the amount of \$0.10 for each TNC trip⁴ and to remit the total fees collected to the Commission on a per county⁵ and quarterly basis beginning the third quarter of 2019. The fees collected from TNCs are deposited into the Commission's TNC Access for All Fund or "Access Fund" for distribution to "Access Providers" that establish on-demand transportation programs or partnerships to meet the mobility needs of persons with disabilities, including wheelchair users who need a WAV, in each county.

¹ [D.20-03-007](#) at 18.

² [D.20-03-007](#) OP7.

³ California Public Utilities Code [§5440.5 \(a\)\(1\)](#).

⁴ See Commission Decision [D.19-06-033](#).

⁵ Commission Rulemaking R.19-02-012 designated each county in California as a geographic area.

TNCs may “offset” the fees due to the Commission by the amounts they spend quarterly to improve their own WAV service in each county.⁶ In [D.20-03-007](#), the Commission established an Advice Letter Process for the review and submission of offset requests.⁷ CPUC approval of offset requests allows the TNCs to keep some of the Access Fee revenue they collect, so long as the WAV service meets performance requirements set by the Commission.⁸ TNCs are allowed to retroactively seek offsets for quarters that preceded the issuance of [D.20-03-007](#), beginning with the quarter starting July 1, 2019⁹ through January 1, 2020.

To obtain an offset, a TNC must, at a minimum, demonstrate “the presence and availability of drivers with WAVs on its online-enabled application or platform, improved level of service, including reasonable response times, due to those investments for WAV service compared to the previous quarter, efforts undertaken to publicize and promote available WAV service to disability communities, and a full accounting of funds expended.” As ordered in [D.20-03-007](#), the purpose of this report is to evaluate the interim response time benchmarks and Offset Time Standard. Therefore, only “improved level of service including reasonable response times” and “the presence and availability of drivers with WAVs on its online-enabled application or platform” (emphasis on number and percent of WAV Trips Completed) submitted by TNCs will be evaluated.

Response Time Benchmarks and Offset Time Standard (OTS)

[D.20-03-007](#) established Interim WAV Response Times and an Interim Offset Time Standard (OTS) shown in Table 1 and Table 2 below for TNCs to demonstrate “improved level of service, including reasonable response times, due to those investments for WAV service compared to the previous quarter...¹⁰.” Response times is “the time between when a WAV ride was requested and when the vehicle arrived.”¹¹ OTS is the percent of trips that must be completed within a certain response time benchmark. [D.20-03-007](#) adopted 50% OTS as Level 1 and 75% OTS as Level 2.

The Commission acknowledged that initial WAV response times should be flexible during the inception of the Access for All Program since there were no existing WAV trip response time data available to establish a standard. Therefore, the Commission adopted a more conservative standard until TNC data could be reviewed. [D.21-03-005](#) did not make changes to the Interim WAV Response Times or Interim Offset Time Standard.

⁶ See Commission Decision [D.20-03-007](#).

⁷ [D.20-03-007](#) OP 19.

⁸ California Public Utilities Code [§5440.5 \(a\)\(1\)\(B\)\(ii\)](#).

⁹ [D.20-03-007](#) at 40.

¹⁰ California Public Utilities Code [§5440.5 \(a\)\(1\)\(B\)\(ii\)](#).

¹¹ [D.20-03-007](#) OP at 20.

Table 1: Interim WAV Response Time Benchmarks¹²

Geographic Area/County	Level 1 Response Time (mins)	Level 2 Response Time (mins)
Group A: San Francisco	15	30
Group B: San Diego, Santa Clara, Alameda, Sacramento, Contra Costa, Ventura, San Joaquin, Stanislaus, Santa Barbara, Solano, San Luis Obispo, Santa Cruz, Shasta, Imperial, Madera, Los Angeles, Orange County, San Mateo	25	50
Group C: Riverside, San Bernardino, Fresno, Kern, Sonoma, Tulare, Monterey, Placer, Merced, Marin, Butte, Yolo, El Dorado, Napa, Humboldt, Kings, Nevada, Sutter, Mendocino, Yuba, Lake, Tehama, San Benito, Tuolumne, Calaveras, Siskiyou, Amador, Glenn, Del Norte, Lassen, Colusa, Plumas, Inyo, Mariposa, Mono, Trinity, Modoc, Sierra, Alpine	30	60

Table 2: Interim Offset Time Standard¹³

Interim Offset Time Standard	Offset Service	Offset Service
April 2020 until subsequent Commission decision	50%	75%

Q3 and Q4 2019 were unique in that TNCs were required to collect and remit Access Fees and then file offset requests retroactively after Decision [D.20-03-007](#). Although Q1 2020 is also considered retroactive, due to timing of the approval of [D.20-03-007](#), CPED enabled fees collected in Q1 2020 to be retained by TNCs for counties in which they are seeking retroactive offsets. If approved, those offsets reduce the amount needed to be remitted to CPUC by the TNCs once a disposition of the relevant Advice Letter is made by CPUC.

To obtain an offset in Q3 or Q4 2019 or in Q1 2020, a TNC must demonstrate that the 50th percentile of completed WAV trip response times in a geographic area improved over the previous quarter. To obtain an offset in Q2 or Q3 2020, in addition to meeting the criteria discussed above, a TNC must also demonstrate that it (1) achieved either the Level 1 (50% of completed trips within the Level 1 Interim WAV Response Time) or Level 2 (75% of completed trips within the Level 2 Interim WAV Response Time) Offset Time Standard (OTS) in their respective counties; and (2) achieved a higher percentage of trips completed within the Level 1 or 2 Interim WAV Response Time from the prior quarter in their respective counties.¹⁴

¹² [D.20-03-007](#) OP 2.

¹³ [D.20-03-007](#) OP 3.

¹⁴ [D.20-03-007](#) OP at 41.

Between Q3 2019 and Q2 2020, 11 offset requests had been made across 18 counties with performance sufficient for approval. Table 3 summarizes the TNCs' approved for offsets by county and by quarter.

Table 3: Summary of TNCs Approved Offset Requests from Q3 2019 to Q2 2020 by county

COUNTY	Q3 2019	Q4 2019	Q1 2020	Q2 2020
ALAMEDA	Uber	Uber	Uber	Uber
CONTRA COSTA	Uber	Uber	Uber	Uber
KERN	n/a	n/a	n/a	Uber
LOS ANGELES	Uber, Lyft	Uber, Nomad	Uber, Lyft, Nomad	Uber, Lyft
MARIN	Uber	Uber	n/a	Uber
MONTEREY	n/a	Uber	n/a	n/a
NAPA	Uber	n/a	n/a	n/a
ORANGE	Uber	Uber	Uber	Uber
RIVERSIDE	Uber	n/a	Uber	Uber
SACRAMENTO	Uber	n/a	n/a	n/a
SAN DIEGO	Uber	N/A	n/a	n/a
SAN FRANCISCO	Uber, Lyft	Uber, Lyft	Lyft	Uber, Lyft
SAN JOAQUIN	Uber	n/a	Uber	Uber
SAN MATEO	Uber	Uber	Uber	Uber
SANTA CLARA	Uber	Nomad	Uber	Uber, Nomad
SOLANO	n/a	Uber	n/a	n/a
STANISLAUS	n/a	n/a	n/a	Uber
VENTURA	Uber	Uber	n/a	n/a

TNC WAV Data in this Report

TNCs are required to report response times in deciles by county and by quarter. Uber reported data in 12 counties, while Lyft reported data for San Francisco and Los Angeles only, and Nomad reported data for Santa Clara and Los Angeles only. Note that response times in San Francisco for Uber and Lyft; Los Angeles for Uber, Lyft, and Nomad; and Santa Clara for Uber and Nomad were combined using a weighted average based on the proportion of completed trips in each county. Weighted averaging based on completed trips is also used in calculating quarterly averages in all counties.

WAV RESPONSE TIME ANALYSIS

Overview

The first part of the analysis looks at the response time data trends for Level 1 (50%) and Level 2 (75%) Offset Time Standard (OTS) by county. Since data submitted by the TNCs are provided in deciles, there are no response times for the 75th percentile. Alternatively, this report inferred the 75th percentile by using the 80th percentile response times to illustrate Level 2 compliance.

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Moreover, county groups are referred to as County Group A, B, and C as shown in Table 1 above.

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Figure 1 below shows that Level 1 average response times in some counties have wide variations by quarter, while others follow a more consistent trend. For example, Sacramento, Marin, Riverside, Ventura, and San Joaquin counties exhibit the steepest changes quarter over quarter. Alameda, Contra Costa, Los Angeles, San Francisco, San Mateo, and Santa Clara have similar Level 1 response times to one another, ranging between 10 and 15 minutes. On the other hand, Level 1 response times in Orange County were shorter and more consistent over time.

In general, a downward trend on the graph is desirable since this means WAV response times are getting faster over time.

Figure 1 demonstrates a slight overall downward trend, with significant variance across counties.

As Table 4 below shows, the weighted average Level 1 response time over this five-quarter period is about 16 minutes in San Francisco and Los Angeles; the interim response time benchmark for San Francisco is 15 minutes and 25 minutes in Los Angeles. With the exception of Sacramento, the weighted average Level 1 response times for Group B counties range between 9 and 18 minutes, with TNC WAV service in San Joaquin demonstrating the fastest response time of about 9 minutes. The Group B interim response time benchmark is 25 minutes. In Group C, which has an interim response time benchmark of 30 minutes, TNCs' WAV service in Riverside and Marin counties demonstrated an average response time of 10 and 21 minutes, respectively.

The weighted averages for Level 2 response times show that the corresponding benchmarks are being met in all counties. As Figure 2 illustrates below, 80% of completed trips in San Francisco and Los Angeles were fulfilled in 23 and 24 minutes or less on average. The interim benchmark in San Francisco is 30 minutes and 50 minutes in Los Angeles. In Group B, averages range between 13-24 minutes, with San Diego showing the fastest response time at 13 minutes. In Group C, 80% of completed trips were fulfilled under 12 minutes in Riverside and 22 minutes in Marin.

Figure 1: Level 1 Response Time Trends over Five Quarters

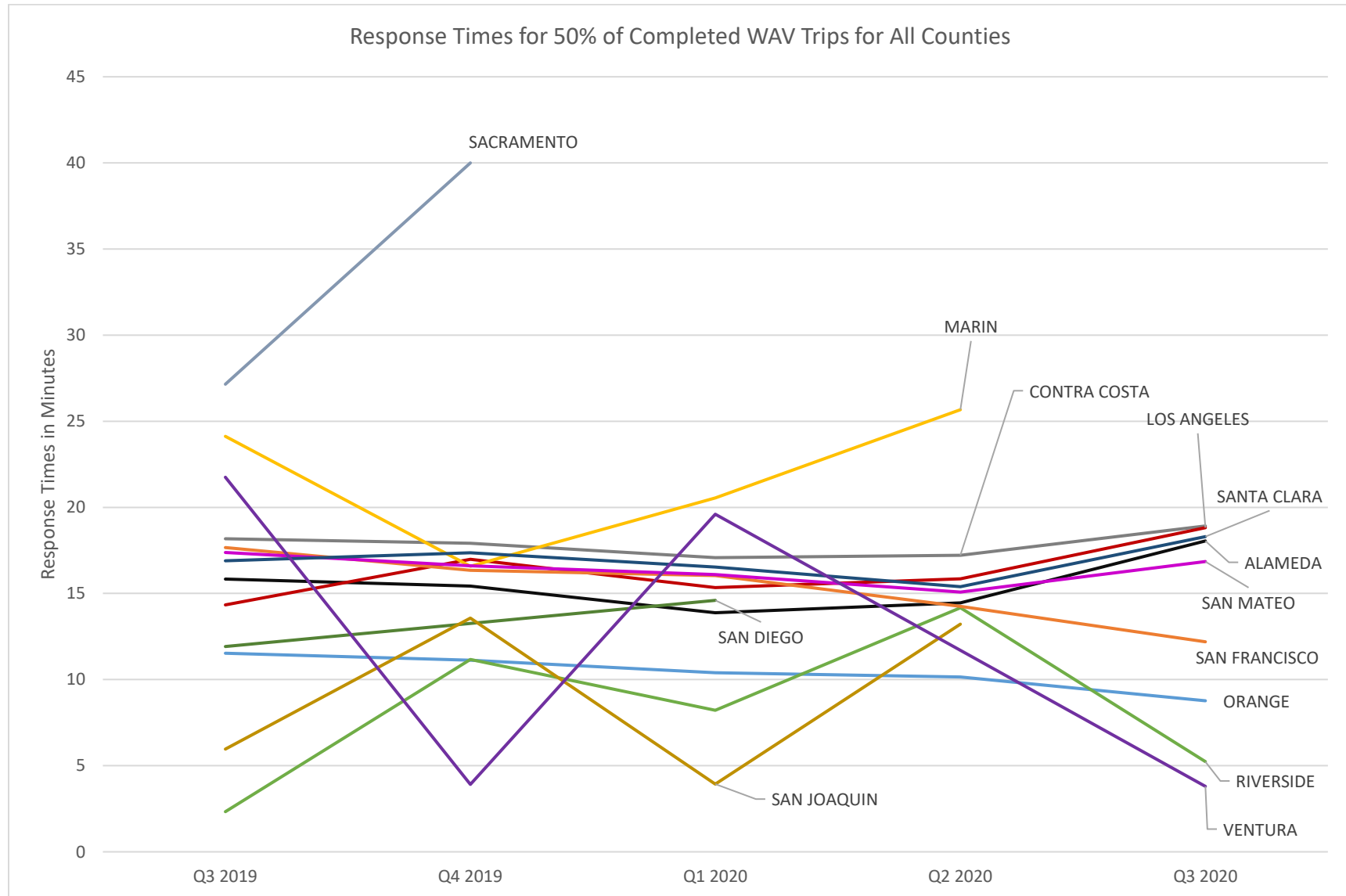


Figure 2: Level 2 Response Time Trends over Five Quarters

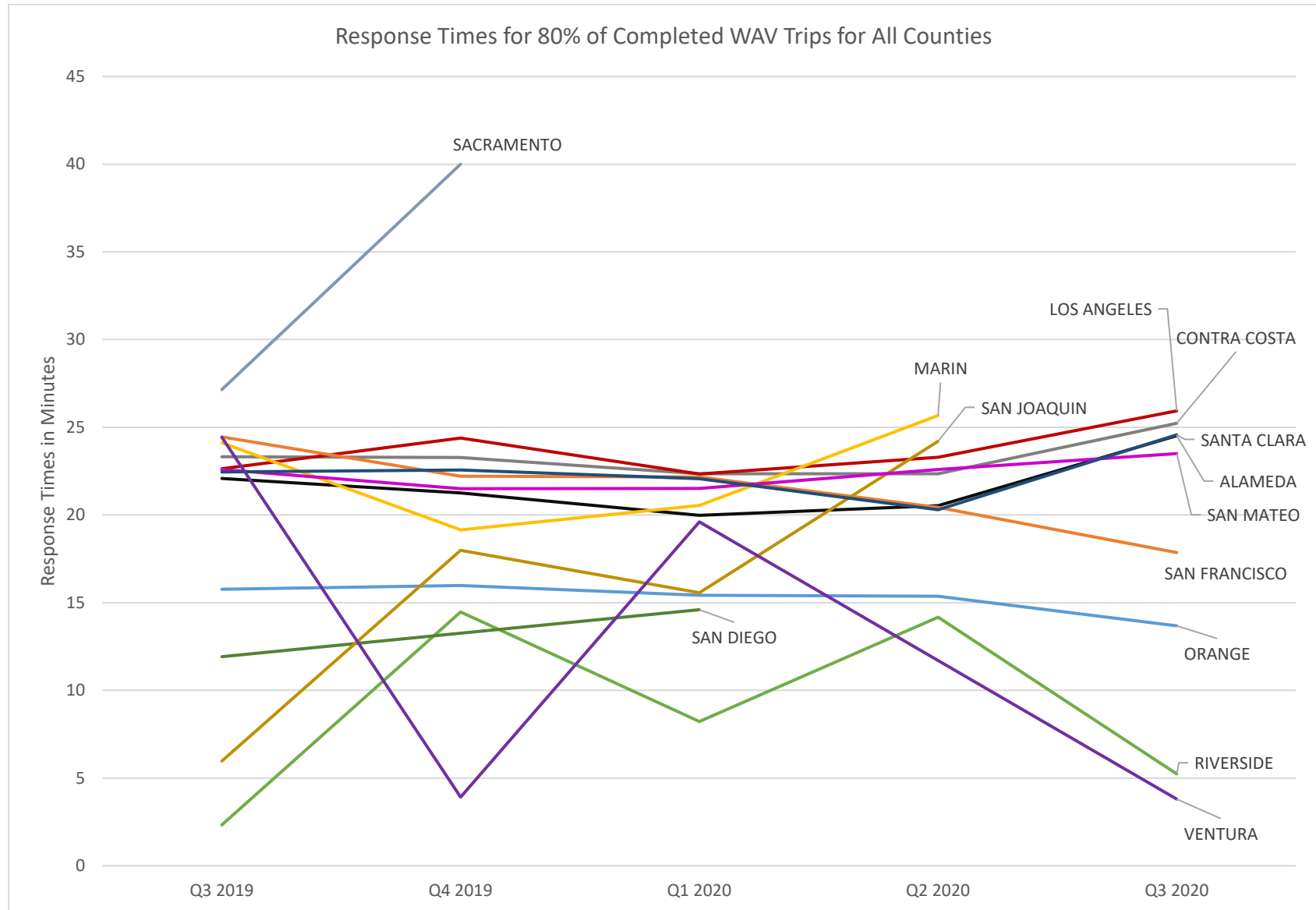


Table 4: Average Level 1 and 2 Response Times

County	Group	Level 1 Benchmarks	Average Level 1 Response Times	Level 2 Benchmarks	Average Level 2 Response Times
SAN FRANCISCO	A	15	16.3	30	22.5
ALAMEDA	B	25	15.2	50	21.3
CONTRA COSTA	B	25	17.8	50	23.1
LOS ANGELES	B	25	16.5	50	23.9
ORANGE	B	25	10.7	50	15.5
SACRAMENTO	B	25	33.6	50	33.6
SAN DIEGO	B	25	13.3	50	13.3
SAN JOAQUIN	B	25	8.5	50	17.2
SAN MATEO	B	25	16.5	50	22.1
SANTA CLARA	B	25	16.9	50	22.3
VENTURA	B	25	13.8	50	14.9
MARIN	C	30	21.2	60	22.0
RIVERSIDE	C	30	9.7	60	11.6

Level 1 and 2 Response Time Trends

Quarterly data by county show that WAV response times are faster than the Level 1 response time benchmarks in all but two counties, and all counties are well below the Level 2 benchmarks.

Table 5 and Table 6 below summarize the quarterly Levels 1 and 2 response times and the corresponding weighted average by county. Data show that response times in the first three quarters in San Francisco are above the benchmark of 15 minutes (red highlight) while the response times in Sacramento in the two quarters are above the 25-minute benchmark. The response times highlighted in light orange illustrate the counties and quarters in which less than 50% of all completed WAV trips were fulfilled within the assigned time benchmark. Level 2 response times, however, are all well under the respective benchmarks.

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Table 5: Level 1 Response Times by Quarter by County

County	Group	Benchmark	Q3 2019	Q4 2019	Q1 2020	Q2 2020	Q3 2020	Average
SAN FRANCISCO	A	15	17.7	16.3	16.0	14.3	12.2	16.3
ALAMEDA	B	25	15.8	15.4	13.9	14.5	18.1	15.2
CONTRA COSTA			18.2	17.9	17.1	17.2	18.9	17.8
LOS ANGELES			14.3	17.0	15.3	15.9	18.8	16.5
ORANGE			11.5	11.1	10.4	10.2	8.8	10.7
SACRAMENTO			27.2	40.0	-	-	-	33.6
SAN DIEGO			11.9	-	14.6	-	-	13.3
SAN JOAQUIN			6.0	13.6	3.9	13.2	-	8.5
SAN MATEO			17.4	16.6	16.1	15.1	16.9	16.5
SANTA CLARA			16.9	17.4	16.5	15.4	18.3	16.9
VENTURA			21.8	3.9	19.6	-	3.8	13.8
MARIN			C	30	24.1	16.6	20.6	25.7
RIVERSIDE	2.3	11.2			8.2	14.2	5.2	9.7
Legend								
Above benchmark								

Table 6: Level 2 Response Times by Quarter by County

County	Group	Benchmark	Q3 2019	Q4 2019	Q1 2020	Q2 2020	Q3 2020	Average
SAN FRANCISCO	A	30	24.5	22.2	22.2	20.4	17.9	22.5
ALAMEDA	B	50	22.1	21.3	20.0	20.5	24.5	21.3
CONTRA COSTA			23.3	23.3	22.4	22.4	25.2	23.1
LOS ANGELES			22.6	24.4	22.3	23.3	25.9	23.9
ORANGE			15.8	16.0	15.4	15.4	13.7	15.5
SACRAMENTO			27.2	40.0	-	-	-	33.6
SAN DIEGO			11.9	-	14.6	-	-	13.3
SAN JOAQUIN			6.0	18.0	15.6	24.2	-	17.2
SAN MATEO			22.6	21.5	21.5	22.6	23.5	22.1
SANTA CLARA			22.5	22.6	22.1	20.3	24.6	22.3
VENTURA			24.4	3.9	19.6	-	3.8	14.9
MARIN			C	60	24.1	19.2	20.6	25.7
RIVERSIDE	2.3	14.5			8.2	14.2	5.2	11.6
Legend								
Above benchmark								

County Group A (San Francisco only)

Level 1

As shown in Figure 3, the 50th percentile reported response time in Group A, which only includes San Francisco, reveals a declining trend, demonstrating overall faster response times quarter over quarter. Weighted average response times are above the 15-minute benchmark in the first three quarters, but below the benchmark in the following two quarters, averaging about 16 minutes over that period.

Level 2

There was demonstrated improvement in Level 2 response times in San Francisco as well, albeit at much higher (longer) response times (Figure 4). On average, 80% of all completed WAV trips in San Francisco are fulfilled in 22.5 minutes or less, well below the benchmark of 30 minutes.

Figure 3: Level 1 Response Times in San Francisco

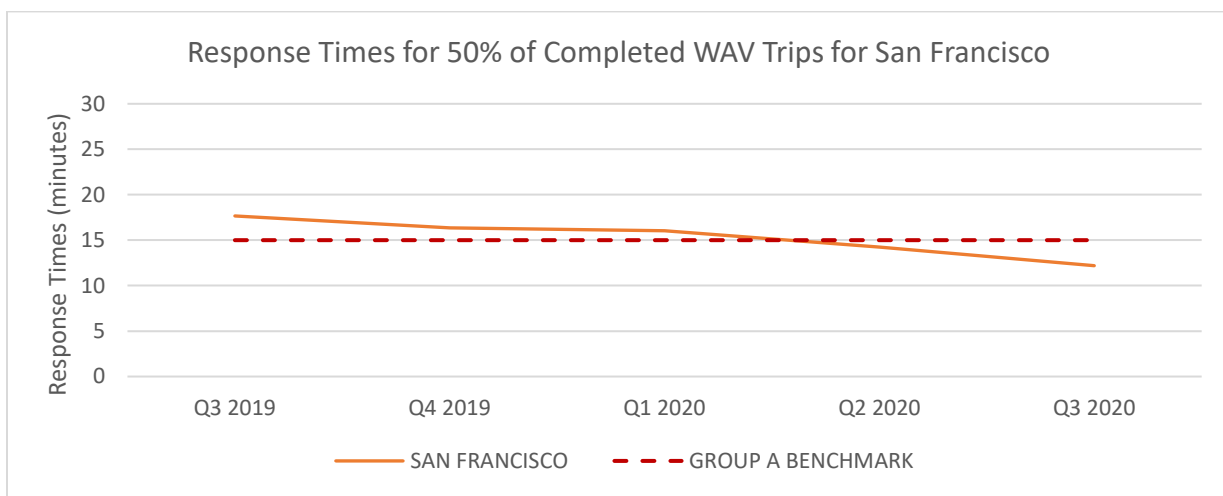
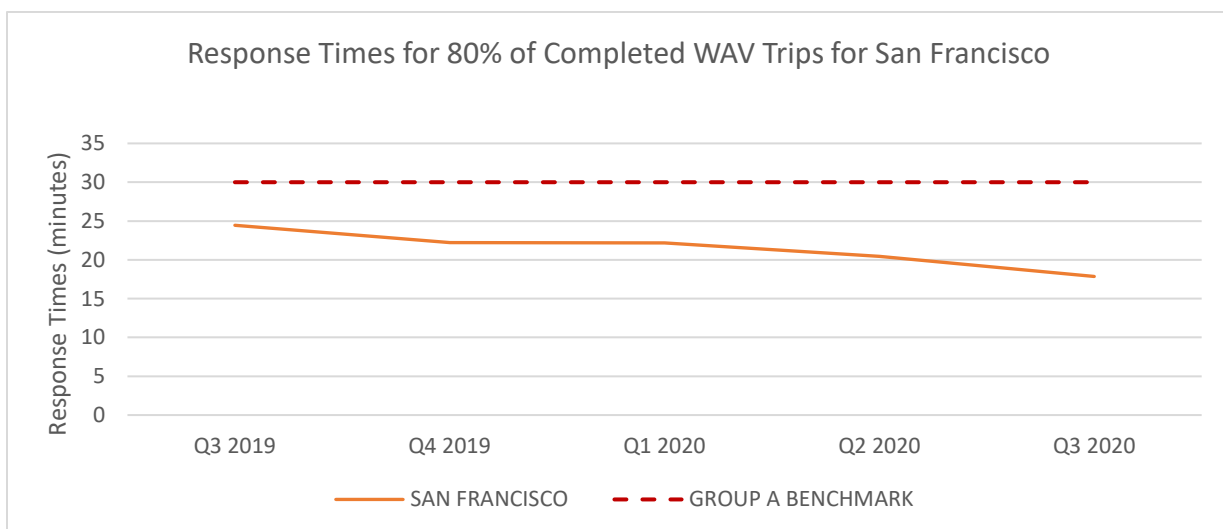


Figure 4: Level 2 Response Times in San Francisco



County Group B

Level 1

For Group B, data are available in 10 counties: Alameda, Contra Costa, Los Angeles, Orange, Sacramento, San Diego, San Joaquin, San Mateo, Santa Clara, and Ventura. Sacramento and San Diego have only two quarters of data, while the others have either three or four quarters of data. As Figure 5 illustrates, quarterly response times in all counties except Sacramento are below the 25-minute benchmark for Group B. Noticeably, five counties follow a similar stable trend with response times ranging between 15 and 20 minutes, while three other counties exhibit inconsistent response times over time. Table 5 above provides the actual response times by quarter for each county in Group B.

As the data show, response times in Alameda, Contra Costa, Los Angeles, San Mateo, and Santa Clara range between 16 and 18 minutes on average over the first five quarters. In contrast, response times in Sacramento show a steep increase over the first two quarters with data, while those in San Joaquin and Ventura demonstrate inconsistent response times. In Q4 2019, TNCs operating in San Joaquin reported that 50% of all completed WAV trips were fulfilled in 6 minutes or less, but that increased significantly to about 24 minutes in Q3 2020. The opposite is true in Ventura County, where half of completed WAV trips were fulfilled in 24 minutes or less in the first quarter, but that declined significantly to about 4 minutes in the last quarter for which data is available. Finally, response times in Orange County were consistent across the reporting period, averaging about 11 minutes, while those in San Diego increased slightly, averaging about 13 minutes during the period.

In Los Angeles, the reported Level 1 response times are on average 8.5 minutes lower than the 25-minute benchmark. Figure 7 below illustrates a slight increasing trend in the first two quarters and a slight decreasing trend in the following quarters, with response times averaging about 16.5 minutes during the five-quarter period.

Level 2

Figure 6 below indicates that the response time trend for 80% of all completed WAV trips in Group B counties follow similar trends as those for 50% of completed WAV trips. Quarterly response time data in **Error! Reference source not found.** demonstrate that average Level 2 response times in Alameda, Contra Costa, Los Angeles, San Mateo, and Santa Clara are similar to one another (21 to 24 minutes), as they are for Level 1 (15 to 18 minutes). Figure 8 focuses in on Level 2 response times in Los Angeles, averaging about 24 minutes over the reporting period.

Figure 5: Level 1 Response Times in Group B Counties

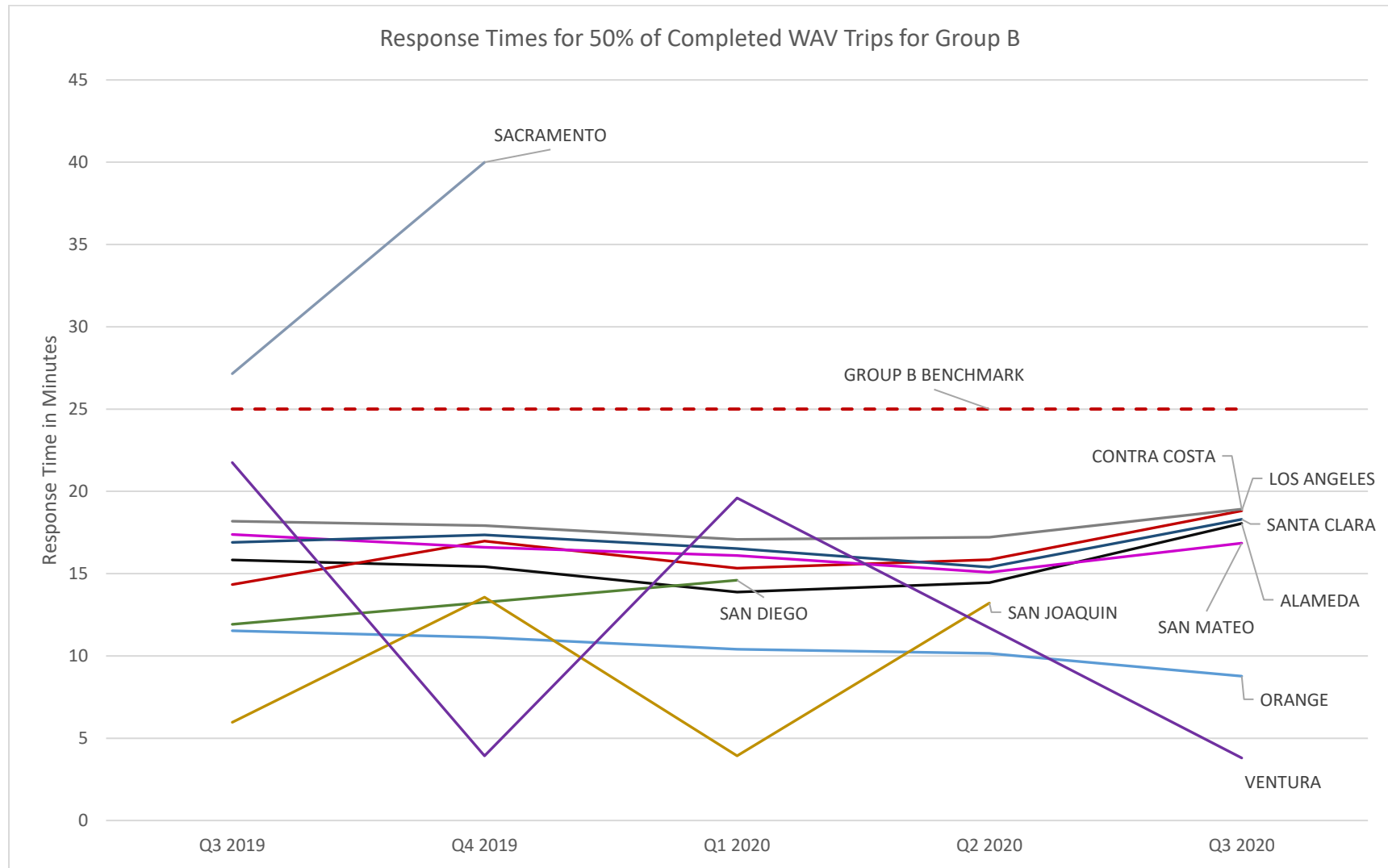


Figure 6: Level 2 Response Times in Group B Counties

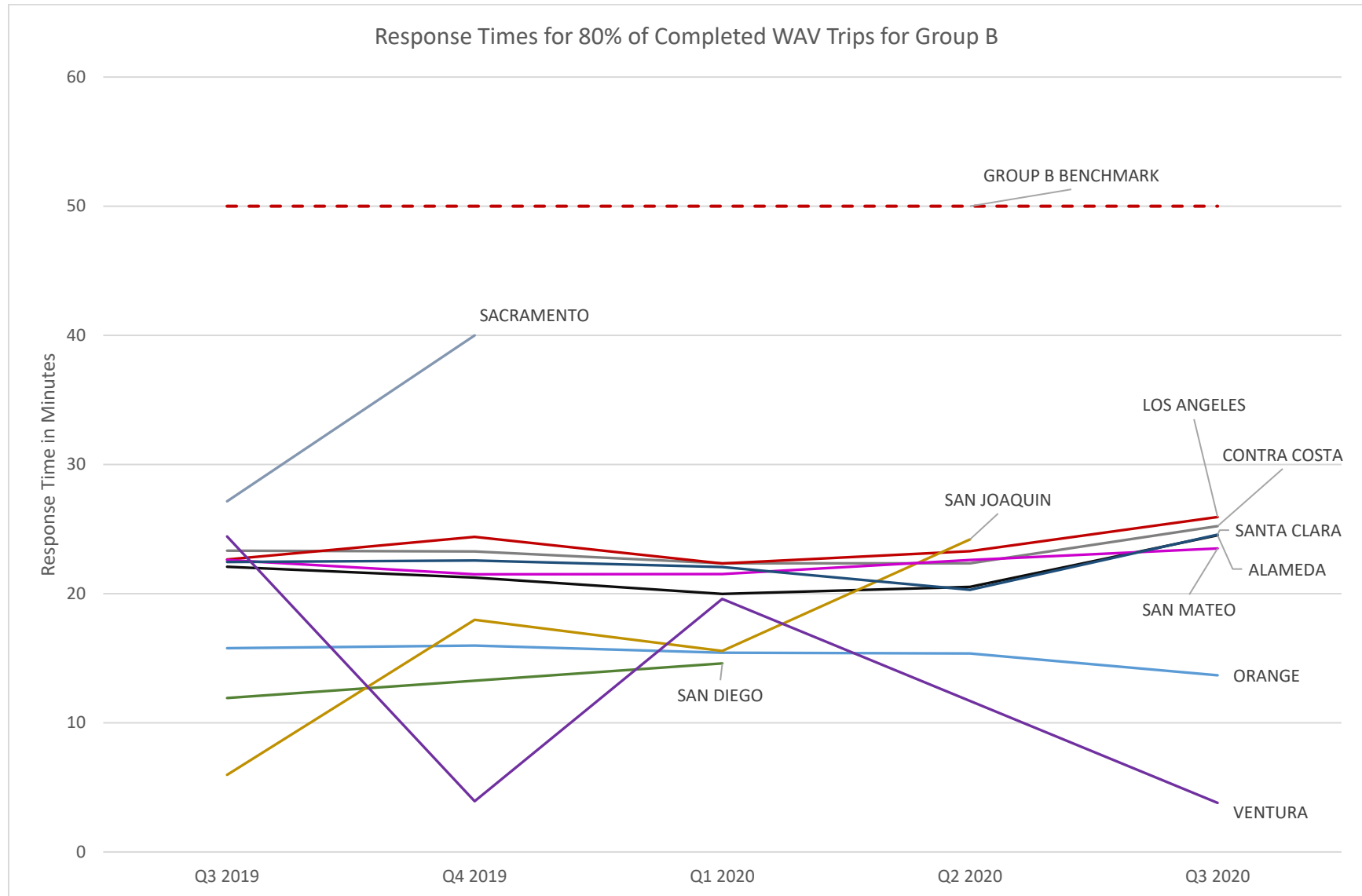


Figure 7: Level 1 Response Times in Los Angeles

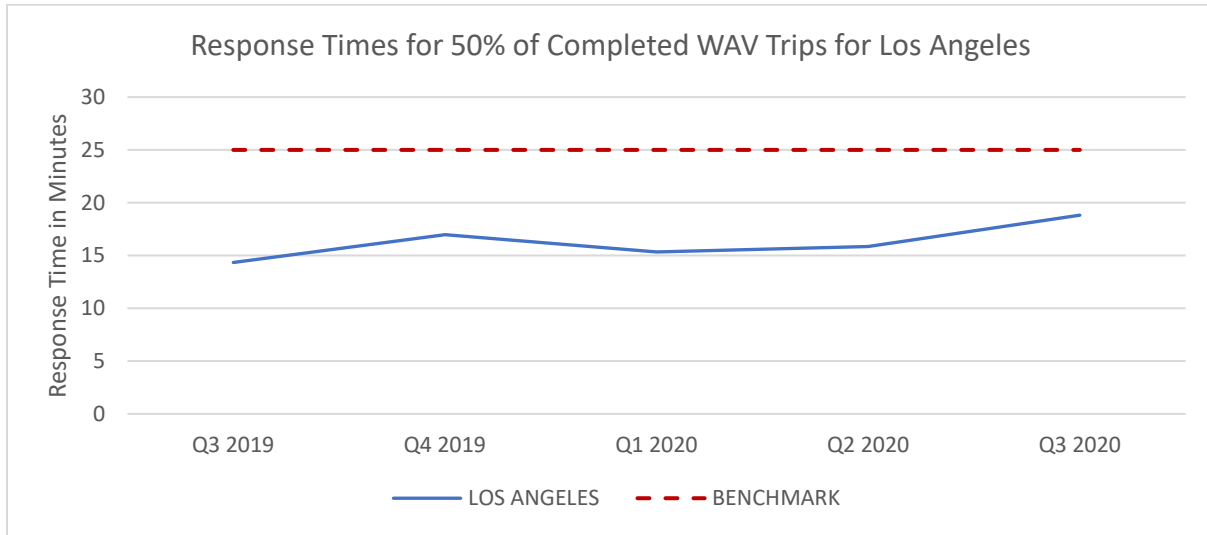
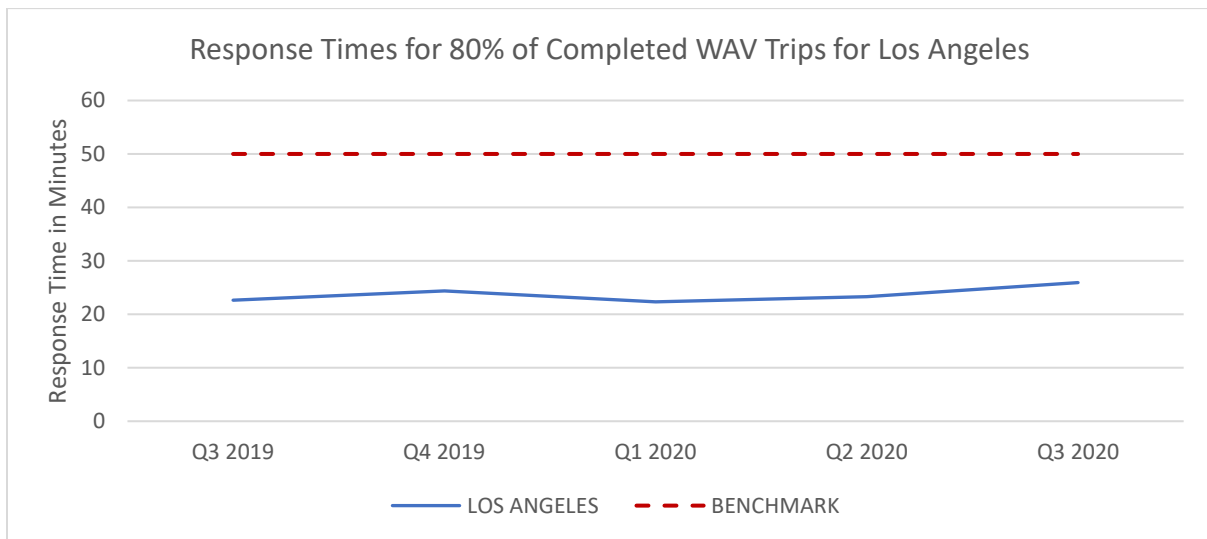


Figure 8: Level 2 Response Times in Los Angeles



County Group C

Level 1

For Group C, response time data are available only in Marin and Riverside counties. As shown in Figure 9, the Level 1 response times for both counties are under the 30-minute benchmark for Group C but vary in magnitude. In Table 5, the average in Riverside is about 10 minutes compared to 21 minutes in Marin.

Level 2

Like Groups A and B, Level 2 response times for Group C counties indicate parallel trends to those in Level 1, but in comparable magnitude. Quarterly average in Riverside is 12 minutes versus 22 minutes in Marin as illustrated in Figure 10 below.

Figure 9: Level 1 Response Times in Group C Counties

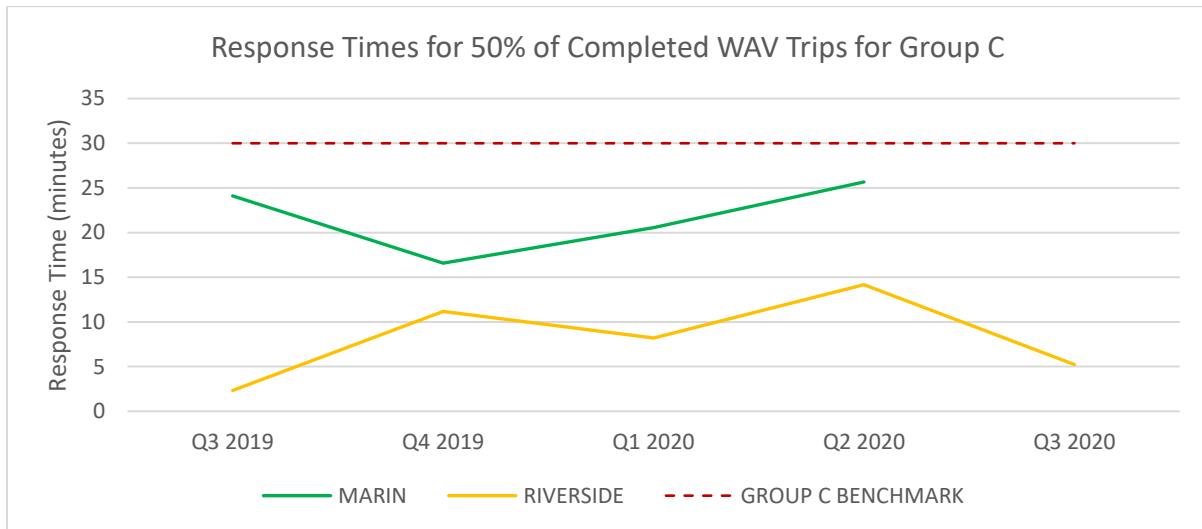
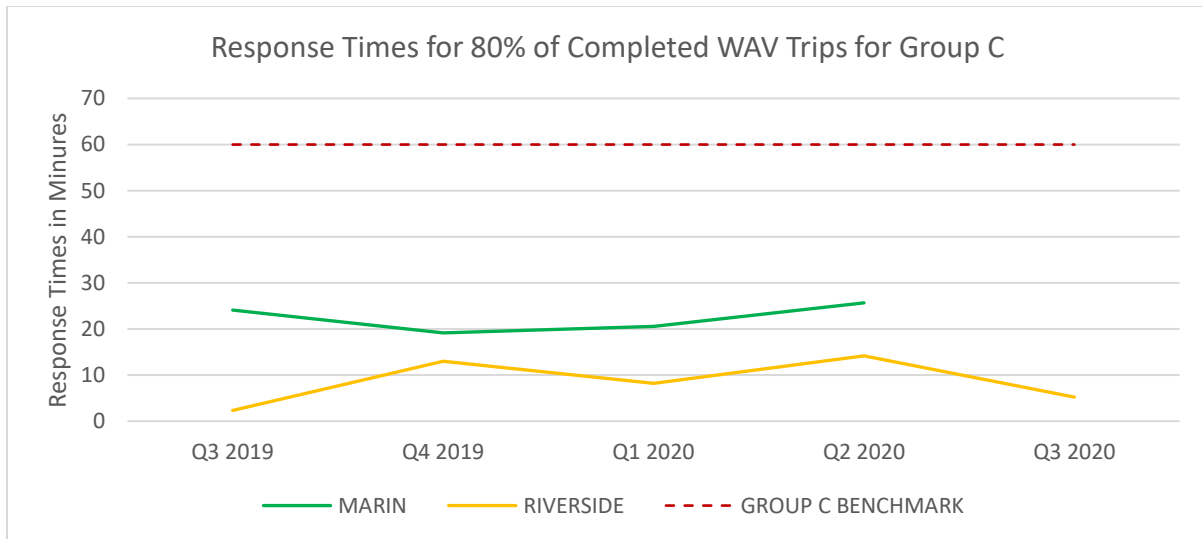


Figure 10: Level 2 Response Times in Group C Counties



OFFSET TIME STANDARD (OTS)

Currently, the interim OTS requires that at least 50% of completed WAV trips satisfy the Level 1 response times or 75% of completed WAV trips satisfy Level 2 response times, and that subsequent quarters demonstrate improvement. Note that the interim OTS covers Q2 2020 and all succeeding quarters. For Q3 and Q4 2019, and Q1 2020, it is only required to show improvement in response times for the 50% of completed WAV trips over the previous quarter. Table 7 below shows the average response times across five quarters for the 50th, 70th, and 90th percentiles of completed WAV trips in each county where data are available. The orange highlight represents the response times above (slower than) the benchmarks.

The data show that the response times required for Level 1 offset eligibility are being achieved in a greater share of completed WAV trips than the minimum standard (50%); as many as 90% of completed trips occur within the Level 1 response time benchmark in some counties. Level 1 response times in seven counties (Alameda, Orange, San Joaquin, San Diego, Ventura, Marin, and Riverside) are under the interim benchmarks for at least 90% of completed WAV trips. Response times for at least 70% of completed WAV trips in three counties (Contra Costa, Los Angeles, and San Mateo) are below the Level 1 benchmarks. The only counties where the average response times are above the interim benchmarks in all percentile groups are San Francisco and Sacramento.

Counties with the highest volume of completed WAV trips—Los Angeles, Alameda, San Francisco—fall into two different Groups, Group A with a 15-minute benchmark and Group B with a 25-minute benchmark. Of the 38,426 total completed WAV trips during the five-quarter reporting period, 62% occurred in Los Angeles where 70% of completed trips demonstrated response times below the 25-minute benchmark. In Alameda County—the second biggest market with about 18% of all completed WAV trips—90% of trips met the benchmark. Less than 50% of completed WAV trips in San Francisco (where 8% of all completed WAV trips took place) met the 15-minute benchmark.

Table 7: Average of Response Times by Percentile Group

County	Group	Level 1	50 th Percentile	70 th Percentile	90 th Percentile
SAN FRANCISCO	A	15	16.3	20.2	26.1
ALAMEDA	B	25	15.2	19.1	24.4
CONTRA COSTA			17.8	21.1	26.0
LOS ANGELES			16.5	20.9	28.7
ORANGE			10.7	13.5	18.3
SACRAMENTO			33.6	33.6	33.6
SAN DIEGO			13.3	13.3	13.3
SAN JOAQUIN			8.5	14.4	17.9
SAN MATEO			16.5	20.0	25.2
SANTA CLARA			16.9	25.7	25.7

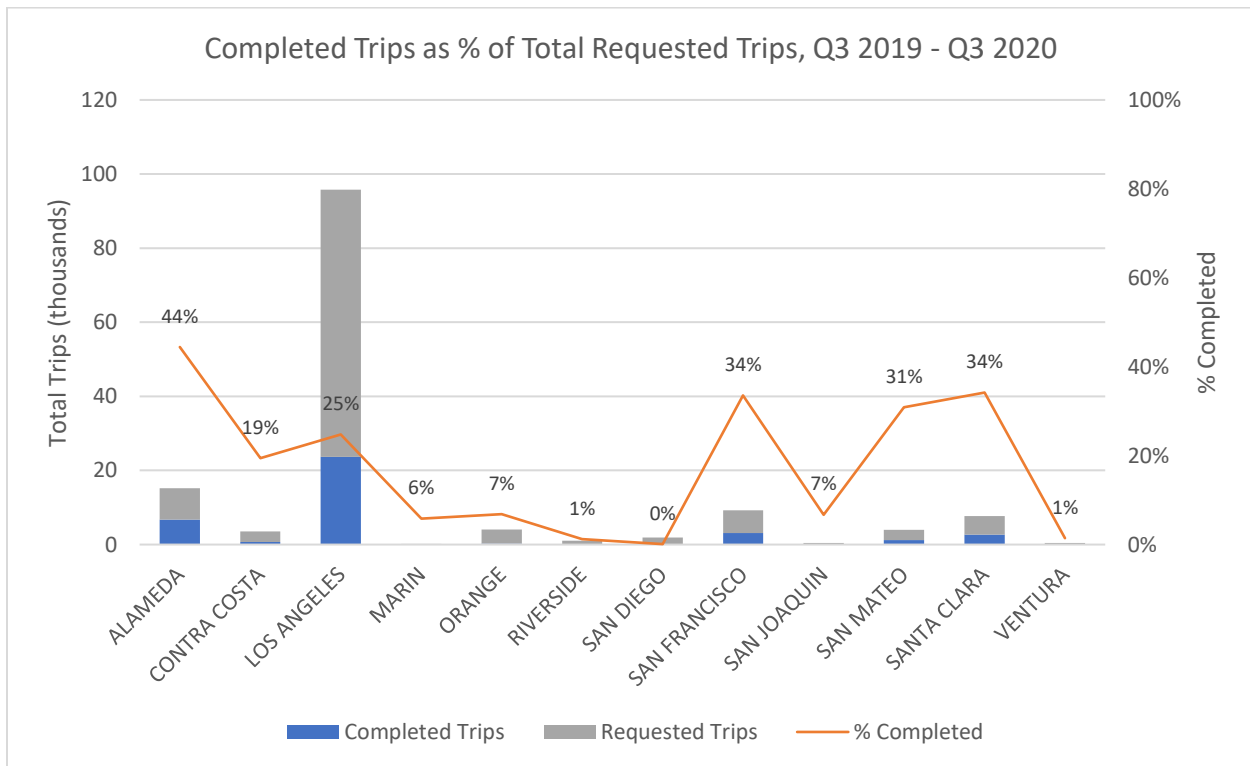
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County	Group	Level 1	50 th Percentile	70 th Percentile	90 th Percentile
VENTURA			13.8	14.9	14.9
MARIN	C	30	21.2	22.0	22.0
RIVERSIDE			9.7	10.8	13.6
Legend					
Above Benchmark					

Although close to 100% of completed trips met the response time benchmark in some counties/quarters (see Table 7), it is important to note that the response time benchmarks are being met in these counties based on a smaller subset of total requested trips. Figure 11 below shows low numbers of completed WAV trips as a percentage of total requested trips per county. Note that the response times analyzed in this report were from the numbers of completed WAV trips represented below. Los Angeles, for example, shows only 25% completion rate while Alameda and San Francisco show 44% and 34%, respectively. A Trip Completion Standard was adopted in [D.21-03-005](#) to help address this. As ordered in the Decision, CPED Staff will continue to monitor WAV response times to better understand the interaction between these two standards.

Figure 11: Completed Trips as Share of Total Requested Trips, Q3 2019 - Q3 2020



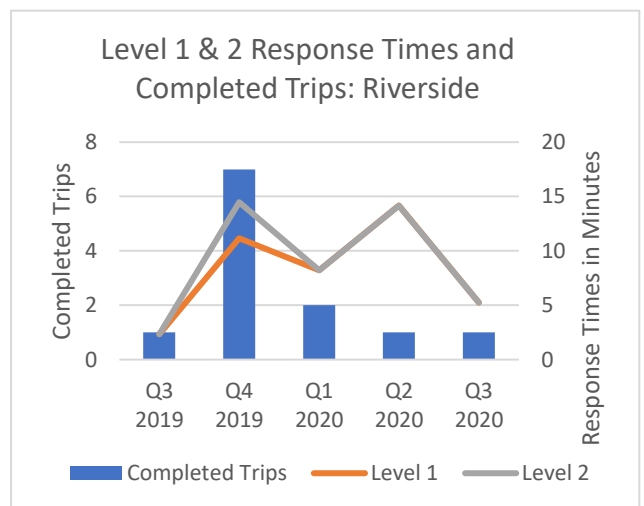
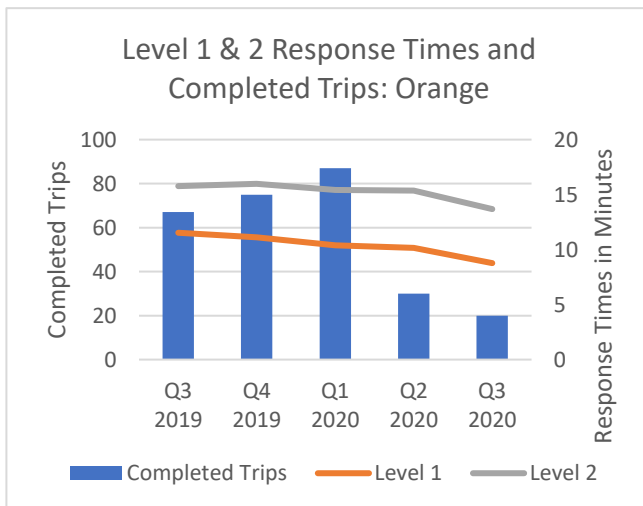
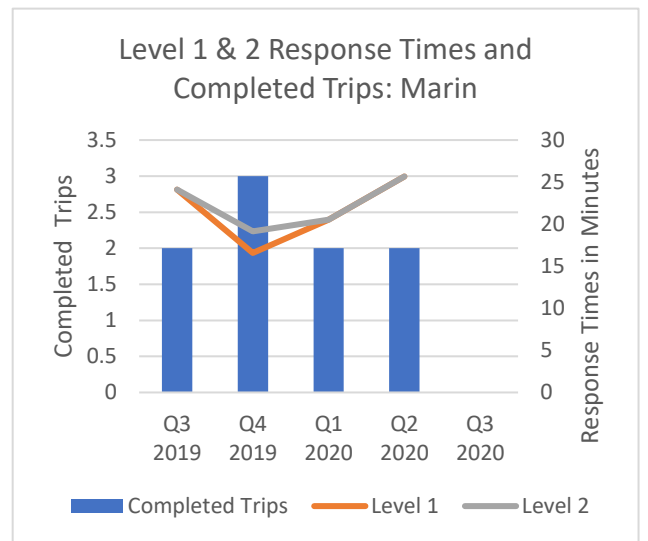
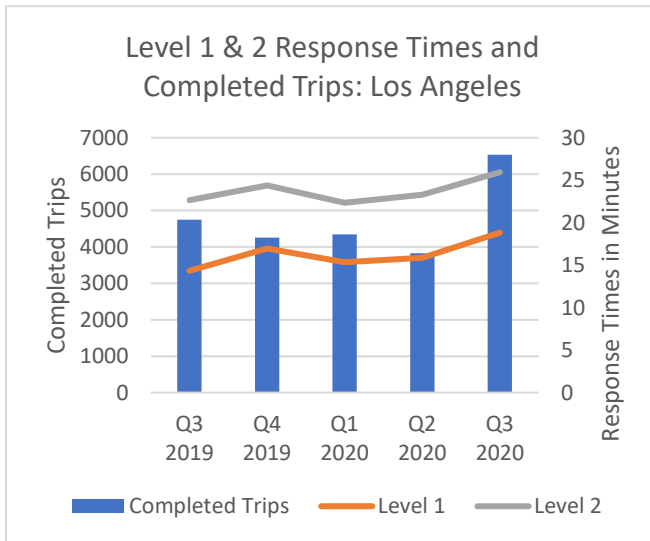
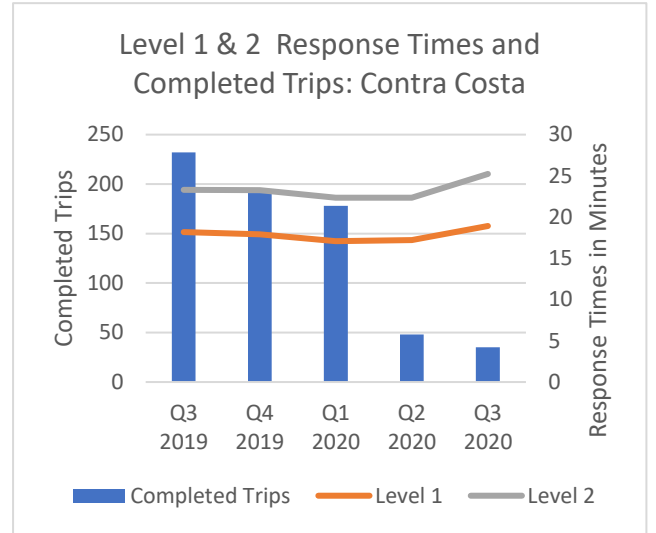
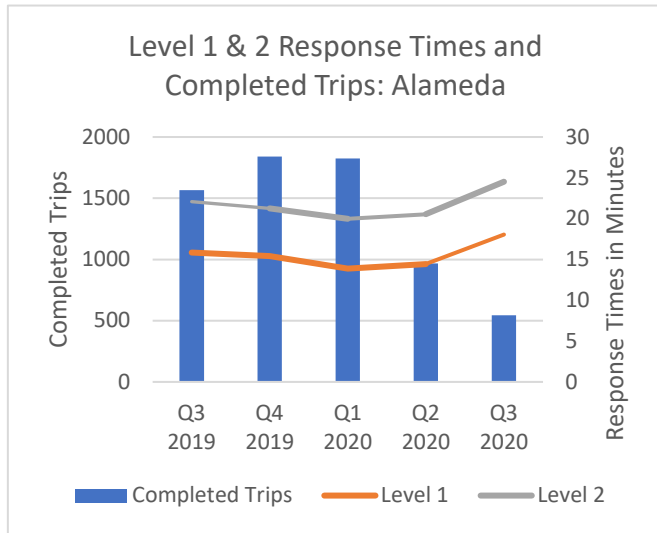
CONSIDERATIONS

Findings suggest that response times submitted in most counties generally meet the Level 1 and Level 2 Offset Time Standard. In considering modifications to adopted benchmarks and standards, it is important to be mindful of the limitations of this dataset, as well as the need to incentivize further improvement without stifling investment. While it may be appropriate to lower the bar where comprehensive data suggests that faster response times are not currently feasible, or to raise the bar where quick response has been demonstrated, the current dataset only tells part of the story.

As such, CPED identified the following considerations to inform any future adjustments to the interim response time benchmarks and/or the Offset Time Standard in the Access for All Program:

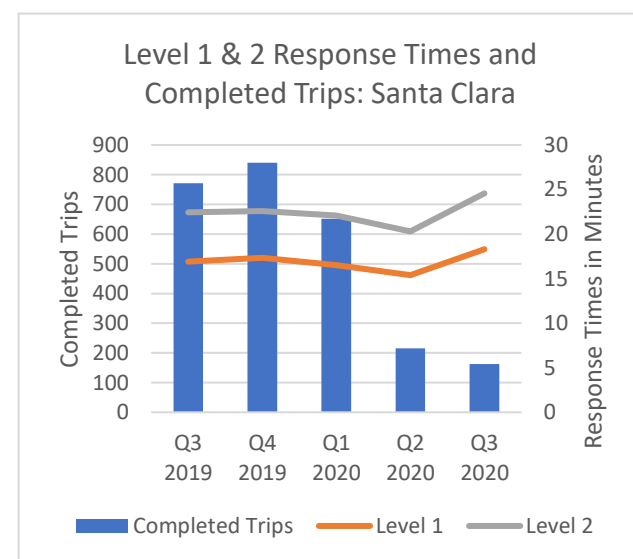
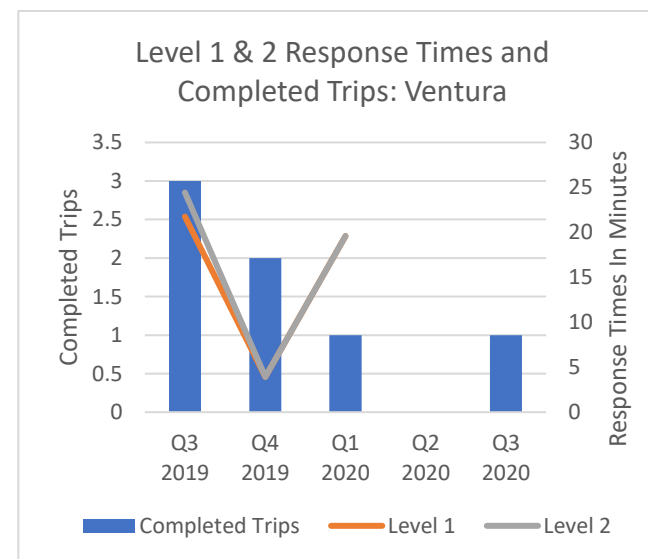
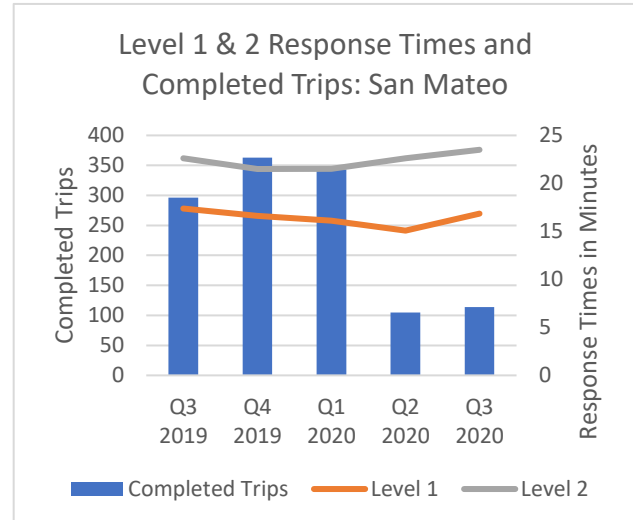
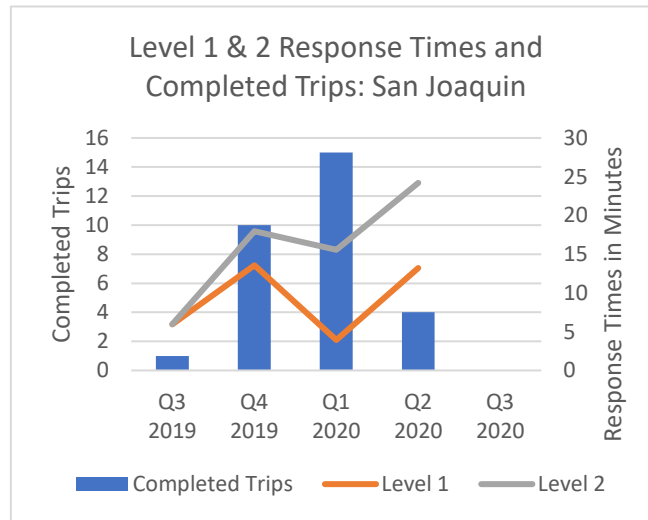
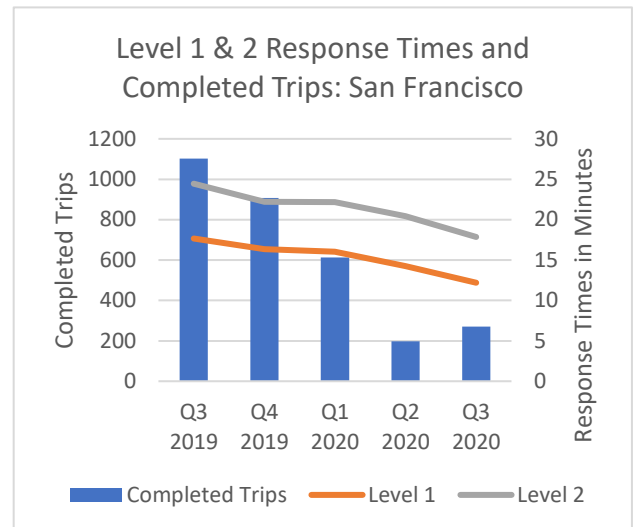
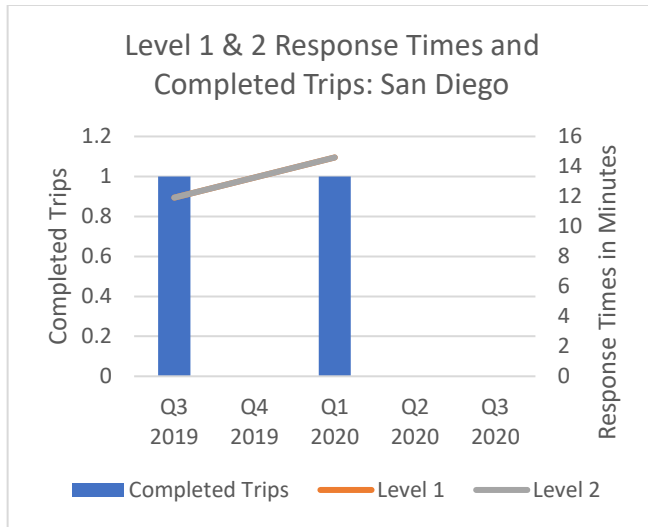
- **The findings in this report lack comprehensive on-demand WAV response time data by county.** Under D.20-03-007, reporting requirements, including response times, are only required for each geographic area or county where a TNC requests an offset. Therefore, the data used to analyze response times in this report reflect performance in the incentive program only and not the entire WAV program. It might not reflect true WAV performance throughout the state, but rather only demonstrates where and when WAV performance met or exceeded the interim standards. Collecting comprehensive data from every county where TNCs have implemented on-demand WAV service, regardless of whether an offset request was filed in that county, is essential to assessing progress toward the original goals of SB 1376 and informing reasonable response time benchmarks as part of this program.
- **CPUC does not currently collect specific information on where on-demand WAV service is offered or focused within each county.** While the response time findings in this report suggest what is possible in specific geographies, they may or may not represent what is feasible countywide. The data submitted by TNCs with their offset requests are aggregated at the county level, including information on where within each county WAV service is present and available. Knowing this specific information is important in both demonstrating continued countywide improvement in response times and enabling growth into less dense areas of counties.
- **Three of five quarters' worth of data in this report represent travel periods impacted by COVID-19.** The impacts of COVID-19 significantly reduced travel statewide, particularly among vulnerable populations. While travel demand and transportation supply are inherently linked, it is unknown how response times on actual completed trips were affected by the impacts of COVID-19. Therefore, the findings of this report should be viewed with the awareness that WAV response times in three quarters could have been higher (slower) or lower (faster), and therefore, it is not advised to base proposed modifications to the interim standards solely on the findings in this report.

APPENDIX A: LEVEL 1 AND 2 RESPONSE TIMES BY COUNTY



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END APPENDIX A