

**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

R.19-02-012
(Filed February 21, 2019)

**TRACK 5B PROPOSALS OF THE SAN FRANCISCO MUNICIPAL TRANSPORTATION
AGENCY, SAN FRANCISCO COUNTY TRANSPORTATION AUTHORITY, AND SAN
FRANCISCO MAYOR'S OFFICE ON DISABILITY**

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Dated: April 15, 2022 _____

I. INTRODUCTION

In accordance with the Assigned Commissioner’s Amended Track 5 Scoping Memo and Ruling issued on January 14, 2022 (“Track 5 Scoping Memo”), the San Francisco Municipal Transportation Agency, San Francisco County Transportation Authority, and San Francisco Mayor’s Office on Disability (collectively “San Francisco”) submit proposals on Track 5B Issues related to the TNC Access for All Act (the “Act”). Track 5B considers what data should be collected to inform the 2024 Legislative Report and potential modifications to the WAV (“wheelchair accessible vehicles”) response time benchmarks; how the Commission can ensure Transportation Network Companies (“TNCs”) are conducting adequate outreach to persons with disabilities; potential pooling of Access Fund moneys among counties with small balances; and how the California Public Utilities Commission (the “Commission”) staff should make decisions about the TNC Access for All program once the proceeding has ended but before the Act sunsets.

We provide specific proposals below. First, to obtain the data needed to inform the 2024 Legislative Report, the Commission must: 1) revise the Requests Accepted Annual Report to include two new fields (“WAV Vehicle” and “WAV Requested”); 2) collect information on WAV service in counties where TNCs did not seek an offset or exemption; and 3) assemble qualitative data from Public Comment and other sources. Second, the Commission should assess the quality of the TNCs’ current outreach and engagement to establish a baseline for expanded outreach requirements. Third, pooling of Access Fund moneys among Local Access Fund Administrators should be allowed, and should be allowed regardless of whether their balances are “small.” Finally, while San Francisco does not provide an exhaustive list of issues that must be addressed after the proceeding closes in February 2023, nor do we make a detailed proposal on how authority should be delegated to Commission staff at this time, we look forward to engaging further with Consumer Protection and Enforcement Division (“CPED”) staff and other parties at the April 27, 2022 workshop. After the workshop, San Francisco will submit comments on this topic and provide a proposal or support an existing one.

II. DISCUSSION

1. TNC Data Collection

a. **What additional data should be collected from TNCs and Access Providers to inform the 2024 Legislative Report and potential modifications to the WAV response time benchmarks?**

The current Advice Letter requirements are sufficient to evaluate the WAV response time benchmarks already adopted by the Commission for WAV service.¹ However, three additional measures are needed to inform the Annual Benchmark Reports and the 2024 Legislative Report: 1) the Commission must revise the Requests Accepted Annual Report to include two new fields: “WAV Requested”, that indicates whether the passenger requested a WAV vehicle, and “WAV Vehicle”, that indicates whether the responding vehicle is a WAV, and revise the Requests Not Accepted Annual Report to include “WAV Requested”; 2) we recommend the Commission collect information on WAV services in counties for which TNCs did not request offsets or exemptions; and 3) the Commission should collect and consider qualitative feedback on the program.

First, the Act requires that the Legislative Report evaluate compliance and the effectiveness of the on-demand transportation programs or partnerships funded. The Act states its intent is “to ensure that transportation network company services do not discriminate against persons with disabilities, including those who use non-folding mobility devices” Therefore, to evaluate compliance with the Act and its intent to ensure non-discrimination, the Legislative Report needs to examine more than whether TNCs are meeting adopted program requirements for offsets and exemptions – it must analyze whether WAV users are receiving comparable service to non-WAV users. From this analysis, the Legislative Report will be able to draw conclusions on whether the program requirements are sufficient or, instead, to craft recommendations to overcome identified deficiencies.²

To evaluate whether services to WAV users are comparable to services to non-WAV users, the Commission must collect and monitor comparable program data for non-WAV service. Currently, the

¹ San Francisco notes that Track 5A considers but does not yet adopt response time benchmarks for pre-scheduled WAV trips. If the Commission establishes separate standards for pre-scheduled trips, as the Proposed Decision on Track 5A recommends, San Francisco’s proposal will also assist in the collection of data necessary to inform those benchmarks and standards.

² Pub. Util. Code, § 5440.5(a)(2)(A)(iv).

Commission collects annually the Requests Accepted and Requests Not Accepted reports, which detail all requests for the reporting period in California. These reports do not differentiate between WAV and non-WAV service. Therefore, the Commission should add to both reports an indicator field, “WAV Requested”, that indicates whether the passenger requested a WAV, and to the Requests Accepted report another indicator field, “WAV Vehicle”, that indicates whether the responding vehicle is a WAV. The “WAV Requested” indicator field will enable the Commission to calculate trip completion rates and response times by geographic area and time of day for WAV and non-WAV service. In addition, because the Requests Accepted and Requests Not Accepted reports are disaggregate, adding the "WAV Requested" indicator field would enable the Commission to cross-validate the TNCs' aggregate data contained in Advice Letters filed for the Access for All program. This validation is valuable to identify reporting errors and irregularities. As an example of the value of report cross-validation, the San Francisco County Transportation Agency (“SFCTA”) recently obtained the 2020 Annual Reports for Uber and Lyft. Uber's reports were substantially complete, while Lyft's reports had significant amounts of data withheld. Nonetheless, the SFCTA compared the number of records in the Requests Accepted report to the total accepted trips in the Aggregated Requests Accepted report for both companies. Uber reported 157,167,691 requests in the Requests Accepted report and 166,464,298 in their Aggregated Requests Accepted report, a difference of 9,296,607, or 6%. Lyft reported 61,072,046 requests in the Requests Accepted report and 110,786,422 in their Aggregated Requests Accepted report, an astounding difference of 49,714,376 or 81%.

If the Commission is unwilling to add “WAV Requested” and “WAV Vehicle” indicator fields to the Requests Accepted and Requests Not Accepted reports, an alternative option would be to require TNCs to file reports for non-WAV service that mirror those filed in Advice Letters. Specifically, the Response Times, OTS, TCS, and WAV Trips reports (as titled in the Advice Letter zip files) establish performance relative to the Trip Completion Standard, Response Time Standard, and Response Time Benchmark, and should also be collected for non-WAV service to evaluate the comparability of service.

Second, the Commission does not have comprehensive information on all WAV services offered by TNCs in the State. In the Track 4 Decision, despite CPED’s proposal that TNCs report on

WAV service availability for all counties, regardless of whether they seek an offset, the Commission only narrowly expanded the information that must be provided and decided that each TNC should only “submit a list of counties in which it operates WAV service, regardless of whether it seeks an offset in that county.” Further, the Commission only required this information “be submitted as part of each TNC’s Quarterly Fee Statement submission” (which is not available in the public record) and did not set an effective date until beginning the 2nd Quarter of 2022.³ The Commission made this decision while recognizing “that more comprehensive data analysis will be necessary to inform the 2024 Legislative Report.” Given that TNCs are operating WAV programs in counties and in certain quarters for which they have not sought an offset, data on program capabilities is incomplete⁴ and would leave the author of the Legislative Report unable to conduct a comprehensive analysis. San Francisco proposes that the Commission remedy this oversight by requiring all TNCs providing WAV service to submit data on WAV service availability, both retroactively to the beginning of the program and moving forward.

Third, the Commission should also assemble qualitative data to complement the quantitative data that informs the Legislative Report. For example, the Act requires an analysis of community WAV demand. Trip data generated by the program are not sufficient to establish what demand exists. For one, there is valid concern that potential riders are not even aware of the program. Second, trip requests and completion rates only tell one part of the story – how many times does a rider typically request a WAV trip? How often are they individually able to receive a ride and what habits have they formed to meet the program’s capabilities, as opposed to the program actually meeting their needs? Statements made in Public Comment and emails sent to the CPUC during the proceeding indicate that riders would like to use WAV service more than they do but have encountered availability issues, which are not captured in quantitative data. In a May 11, 2021 email to TNCaccess@cpuc.ca.gov, Brianna Gross shared that in her experience, “[i]t was always incredibly difficult to get a WAV vehicle...I would always be nervous about taking a TNC WAV vehicle somewhere, and then getting

³ Decision on Track 4 Issues, pp. 18-19.

⁴ For example, data for Lyft’s service in San Francisco is currently unavailable for Q4 2020 and Q4 2021.

stuck there because there may not be any WAV vehicles around to take me home.” In a May 13, 2021 email to TNCaccess@cpuc.ca.gov, Alice Wong explained that:

“As a person who uses a power chair I believe it is imperative that companies such as Lyft and Uber provide more WAVs on demand. I haven't attempted to request one based on horror stories from other wheelchair users who had rides cancelled or over an hour late. Non-disabled people can request a ride at almost any time of the day from practically any location. This is not the case for people who use power wheelchairs and there must be an adequate and reliable supply of these vehicles before people like me can order a trip with confidence. Right now, it's simply unreliable and not a risk I'm willing to take.”

These comments speak to the importance of gathering qualitative data to tell the full story of community WAV demand, and of the program as a whole. Qualitative stakeholder feedback is essential to determining current program capabilities and deficiencies, and necessary to craft practical recommendations to overcome any identified deficiencies.

b. How can this data collection advance the goals of the Commission's Environmental and Social Justice Action Plan?

To advance the goals of the Commission's Environmental and Social Justice Action Plan (“ESJ” or “ESJ Action Plan”) and meet the tasks outlined in the most recent draft, the Commission will need to revise reporting requirements. Specifically, San Francisco proposes the Commission revise geographic reporting requirements to meet the ESJ Action Plan's goal to "strive to improve access to high-quality water, communications, and transportation services for ESJ communities." It includes within ESJ communities, the following groups:

- Disadvantaged Communities, defined as census tracts that score in the top 25% of CalEnviroScreen 3.0, along with those that score within the highest 5% of CalEnviroScreen 3.0's Pollution Burden but do not receive an overall CalEnviroScreen score:

- All Tribal lands;
- Low-income households; and
- Low-income census tracts.

Therefore, in order to evaluate the provision of WAV service consistent with the groups identified in the ESJ Action Plan, the Commission should revise the geographic area reporting

requirement to include Census Tract (in addition to County). San Francisco continues to assure the Commission that reporting on a Census Tract level protects the privacy of individuals while still providing essential information for the public good.⁵

More broadly, we note that the ESJ Action Plan recognized a key theme from its ESJ Workshop was to “Work towards more transparency of data and information. Provide stakeholder and CPUC staff with tools and resources to facilitate analysis of ESJ issues and impacts.”⁶ The Commission has a specific opportunity to improve transparency of data and information in the TNC Access for All proceeding. All of the information provided in TNC Advice Letters for Offsets and Exemptions is incredibly valuable for understanding the state of wheelchair accessible TNC service throughout California. However, the way CPUC requires the TNCs to file the information to a small group and in a difficult-to-read format has limited the utility of the data. In San Francisco’s Proposal on Track 3 Issues, we strongly recommended “that the Commission develop dashboards that make the data demonstrating performance in relation to response time and percentage of requested trips completed available to the public in a user-friendly manner on a county by county basis.”⁷ To serve WAV users and increase transparency in San Francisco, the City worked closely with a pro-bono partner to create dashboards that track TNC Access for All Act performance data for all counties in the California for which TNCs have submitted data as part of the Access for All program, accessible at <https://www.sfmta.com/transportation-network-company-tnc-access-all-reporting>. While San Francisco’s dashboards currently fill a critical need for data transparency of the TNC Access for All

⁵ Reply Comments Of The San Francisco Municipal Transportation Agency, San Francisco County Transportation Authority, San Francisco City Attorney’s Office, And San Francisco International Airport To Phase III.C Scoping Memo And Ruling Of Assigned Commissioner (Track 3 – TNC Data), p. 11: “First, census tracts are systematically managed and tracked over time; when their boundaries change, the U.S. Census Bureau publishes detailed documentation to support researchers seeking to validate data tracked over time. Second, while it is possible for a zip code to reflect a single building, census tracts are normalized to reflect an optimum size of 4000 people. Where population shifts over time, the normalized size of a census tract would continue to protect passengers from re-identification, whether the census tract reflects a dense urban environment or a more rural environment. (The Census Bureau also uses an even smaller area – a ‘block group’; we think the various public purposes served by release of aggregate trip data are adequately addressed at the census tract level.) 18 Third, unlike zip codes, the U.S. Census Bureau provides demographic data by census tract that would enable the Commission to analyze population characteristics of the demand for TNC service and its supply. This demographic data would support the Commission in evaluating claims of discrimination in service delivery.”

⁶ Environmental and Social Justice Action Plan Version 2.0, p. 53.

⁷ Proposals of The San Francisco Municipal Transportation Agency, San Francisco County Transportation Authority, And San Francisco Mayor’s Office on Disability On Track 3 Issues, p. 11.

program, San Francisco proposes that the Commission provide this information in the future. While we do our best to ensure accuracy, Commission staff are better able to track and manage changes that are made in supplemental filings and in any revised Commission-issued reporting templates.

Finally, Table 1 below offers recommendations for how the Commission can utilize data from the TNC Access for All proceeding to inform a number of specific goals, objectives, and action items in the ESJ Action Plan that was available at the time the scoping memo was first issued.

Table 1: Application of TNC Access for All Data to ESJ Action Plan Actions

ESJ Action Plan	Application of TNC Access for All Data
<p>Action 1.2.6 Explore Capacity Building Initiatives</p> <p>Explore methods of educating ESJ communities on fundamental principles of utility regulation and impacted industries</p> <ul style="list-style-type: none"> 1- Explore the feasibility of developing educational materials for ESJ communities on the fundamentals of utility regulation including an overview of emerging and key issues facing ESJ communities; 2- Explore developing a public repository of ESJ-related reports or other resources. 	<p>TNC Access for All data should inform educational materials that help ESJ communities understand the key issues persons with disabilities face in accessing accessible on-demand transportation.</p> <p>Further, materials should focus on the intersectional identities of disabled persons in California and recognize that persons with disabilities are likely to belong to more than one “ESJ community.” For example, in San Francisco, 1 in 4 persons with disabilities in San Francisco live in poverty.⁸</p>
<p>Action 3.1.1 Implementation and Monitoring of Accessibility of TNCs and AVs Identify opportunities through transportation proceedings and their implementation to improve transportation accessibility for ESJ communities</p>	<p>Staff should summarize data on WAV service submitted in the TNC Access for All proceeding and make it available in comparison to non-WAV service so that the ESJ Action Plan Committee understands the</p>

⁸ Disability in San Francisco Fact Sheet, San Francisco Department of Disability and Aging Services, <https://www.sfhsa.org/about/reports-publications/disability-san-francisco>

<ul style="list-style-type: none"> 1- Share all TNC Access for All Staff Reports with the ESJ Action Plan Committee (as ordered in Decisions) 2- Summarize Accessibility data collected in TNCs’ Annual Reports and AVs’ Quarterly Reports annually 	<p>difference in levels of service faced by subsets of different communities. The Commission should adopt new “WAV Requested” and “WAV Vehicle” indicator fields in the Requests Accepted and Requests Not Accepted Annual Reports to support more robust WAV data summaries.</p>
<p>Action 5.1.1 Fact Sheets and Collateral Materials</p> <p>Continue to update CPUC Fact Sheets and Brochures to ensure information is up-to-date and accessibly written.</p> <ul style="list-style-type: none"> 1- Ensure CPUC website includes collateral materials for key programs and initiatives 2- Revise and post materials in need of updates 3- Consider developing fact sheets for proceedings that may impact an ESJ community which include key information such as timelines to submit comments. 	<p>CPUC should develop and publish public dashboards for TNC Access for All Data, including WAV performance data and information on monies remitted to and available from the Access Fund.</p>
<p>Action 6.2.1 Proactively Initiate Compliance Checks in ESJ Communities Consider opportunities to proactively work in ESJ communities to ensure compliance with CPUC regulations.</p> <ul style="list-style-type: none"> 1- Analyze complaint data to understand overlap with ESJ communities and adjust enforcement strategies as appropriate 	<p>Staff should incorporate complaint data received in Advice Letters and other reporting in the TNC Access for All proceeding.</p>

<p>2- Consider prioritizing ESJ communities when performing compliance checks or conducting field enforcement work</p>	
<p>Action 6.2.4 Analysis of Potential Redlining in ESJ Communities by Transportation Network Companies (TNCs) Analyze existing data to understand if passenger carriers are systematically serving ESJ communities differently.</p> <p>1- Determine if patterns of bias exist in TNC service to ESJ communities compared with others, by analyzing TNC data to include drop-off and pick-up locations, fares charged, and trip acceptance rate</p> <p>2- Explore opportunities to publish report with findings</p>	<p>Staff should utilize data collected in the TNC Access for All proceeding to analyze whether WAV services are systematically serving ESJ communities differently. The Action Plan includes ESJ communities that are defined at a Census Tract geographic area. The Requests Accepted and Requests Not Accepted Annual Reports, which contain Census Tract information, should be revised to include “WAV Requested” and “WAV Vehicle” indicator fields to support this analysis. Additionally, any data collected through the Access for All program should be reported for Census Tracts.</p>
<p>Action 9.1.1 Metrics to Measure Impact, Community Outreach & Engagement Develop metrics, criteria, and guidance to ensure that programs and/or funds are having the intended effect and measure meaningful and effective outreach and engagement.</p> <p>1- Catalogue the existing set of data and metrics currently being used by utilities to measure community engagement</p> <p>2- Review best practices in the field and consult sister agencies</p>	<p>As part of this work, staff should make sure to catalogue data and metrics for outreach reported as part of TNC Advice Letters requesting Offsets or Exemptions in the TNC Access for All proceeding.</p>

<p>3- Develop customizable set of criteria for utility outreach, engagement, and benefit to community</p> <p>4- Sync with efforts to align Marketing, Education, and Outreach (ME&O) Plans within Energy Division</p>	
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2. TNC Community Outreach

a. How should the Commission ensure that TNCs undertake effective engagement with the disability communities to further acceptance and expansion of on-demand WAV service?

San Francisco appreciates the CPUC’s attention to the issue of community outreach, which is essential to the growth of on-demand WAV service. Outreach is a statutory requirement⁹, and the CPUC established in Track 2 that TNCs must report their outreach and engagement activities through the Advice Letter process¹⁰. As of Track 5A, however, there is no connection between the quality of outreach and whether a TNC is granted an offset or exemption, and the CPUC does not currently attempt to measure the effectiveness of the TNCs’ outreach. As the Disability Advocates have explained, the outreach described in past Advice Letters is inadequate¹¹. The CPUC should begin by assessing the quality of the TNCs’ current outreach and engagement in order to establish a baseline for expanded outreach requirements.

One measure of outreach effectiveness is broad awareness of a program. **In order for the WAV program to reach as many potential users as possible, the wider population must know that WAV options exist.** In addition to people with disabilities themselves, service providers, family members of disabled people, and the general public should be the target of WAV outreach. The CPUC should gauge this general awareness through a survey. To accomplish this, the CPUC should write a

⁹ Pub. Util. Code, §§ 5440(i), 5440.5(a)(1)(I)(4).

¹⁰ D.20-03-007, p. 21.

¹¹ See, e.g., Disability Advocates’ Protest regarding Uber’s Advice Letter 4A Requesting Offsets (January 8, 2021), pp. 2-4; Disability Advocates’ Protest regarding Lyft’s Advice Letter 4A Requesting Offsets (January 19, 2021), pp. 2-4.

survey and distribute it, also requiring TNCs to share it with their riders (WAV and non-WAV alike). High awareness of the WAV program would indicate that TNCs are conducting effective outreach, whereas low awareness of the WAV program would mean that TNCs should be devoting many more resources into marketing and engagement. CPUC staff should also re-form a Working Group, as required by the Act,¹² and host a workshop focused on disability community engagement in the TNC Access for All program, which would provide an opportunity to hear feedback on the TNCs' outreach methods directly from the disability community. Additionally, CPUC staff should analyze the organizations that TNCs have reported conducting outreach to, examining who the organizations serve and whether TNCs are reaching a broad swath of the large and diverse disability community. Ultimately, staff should write a report based on their findings, and use those findings to inform outreach requirements of TNCs going forward.

San Francisco also takes this opportunity to share outreach recommendations for TNCs. San Francisco suggests that TNCs expand their outreach to disability communities by including WAV marketing alongside their general marketing campaigns, sharing information with disability organizations and other entities who serve people with disabilities, and working to get specific feedback on major program components.

San Francisco recommends that **TNCs include information about disability access and WAVs in general marketing campaigns**. TNCs should be widely advertising that they have WAVs available across all of their platforms, aiming for broad awareness of WAV service. In addition, TNCs should ensure that their apps are accessible to people with disabilities and that WAV options are prominently featured on their apps.

Furthermore, TNCs should **share more information about WAV service and build relationships with disability organizations**, and with other entities who serve the disability community, including hospitals and doctors' offices. TNCs should outreach to a variety of age groups, including both younger and older people with disabilities, and to families of people with disabilities. Additionally, many people with disabilities who might use WAV service do not speak

¹² Pub. Util. Code, § 5440.5(a)(3).

English, so multi-lingual marketing, especially in Cantonese and Spanish, is important to reach the broadest possible customer base.

Finally, TNCs should conduct targeted outreach aimed at gathering **specific feedback on major program issues**, including the demand for pre-scheduled trips, desired hours of service, and so on. This type of two-way engagement, rather than simply sending an email to an organization with program information, will help build trust in the program and generate actionable feedback to improve service.

3. Multicounty Pooling of Funds

- a. For counties where the amount of Access Fund moneys available is relatively small, should Access Fund moneys be permitted to be “pooled” across multiple counties? If so, what criteria should be used to determine multi-county pooling? What other requirements should be considered?**

Regardless of whether the amount of Access Fund moneys is “relatively small” or not, San Francisco supports Local Access Fund Administrators who wish to optionally pool funds across multiple counties with other Local Access Fund Administrators if it will benefit their communities and they see a need. Any pooling of funds should be entered into voluntarily under terms negotiated and agreed to by any Access Fund Administrators wishing to participate, as long as they can meet the Commission’s program requirements.

- b. Should the Commission allow fund pooling only in counties served by the Statewide Fund Administrator, only in counties served by individual Local Access Fund Administrators, or both?**

The Commission has not yet established a Statewide Access Fund Administrators (“SAFA”) so we do not know how the program will be set up and what utility pooling funds from multiple counties by the SAFA will provide in these cases. Individual Local Access Fund Administrators have firsthand knowledge of services, costs, etc. that should enable them to make an informed decision about fund pooling, but it is unclear what issues, resources, and knowledge the SAFA will have as the Commission has not yet engaged one. For this reason, San Francisco only recommends allowing pooling in counties served by Local Access Fund Administrators at this point.

- 4. This proceeding is set to close in February 2023, while the Access for All Act Program will sunset on January 1, 2026, pursuant to SB 1376. Should Commission Staff be delegated authority to make decisions on certain aspects**

of the Access for All Program once the proceeding has closed? If so, which issues?

San Francisco foresees that the Commission will need to make decisions on a number of aspects of the Access for All Program once the proceeding has closed, including but not limited to: potential changes to offset and exemption requirements (pending findings from Annual Benchmark Reports and the 2024 Legislative Report); reporting requirements; Access Fund Program Requirements and Fund Disbursements (particularly if the structure or requirements of the program need to be modified so that moneys can be spent); and auditing and compliance issues (such as in a case similar to discovering the performance and reporting of pre-scheduled trips). At this time, San Francisco does not provide an exhaustive list of issues or make a detailed proposal on how authority should be delegated to Commission Staff. However, we look forward to engaging with CPED staff and other parties in the April 27, 2022 workshop to further our thinking, which we will document in our Comments on Proposals and the Workshop in May.

III. CONCLUSION

San Francisco appreciates the opportunity to provide our proposal on Track 5B issues and looks forward to the workshop on April 27, 2022.

Dated: April 15, 2022

Respectfully submitted,

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