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)

ADDITIONAL PROPOSAL OF THE SAN FRANCISCO MUNICIPAL TRANSPORTATION AGENCY, SAN FRANCISCO COUNTY TRANSPORTATION AUTHORITY, AND SAN FRANCISCO MAYOR'S OFFICE ON DISABILITY ON TRACK 5A ISSUES

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Dated: June 30, 2022

INTRODUCTION

In accordance with Rule 14.3 of the Commission's Rules of Practice and Procedure, the San Francisco Municipal Transportation Agency ("SFMTA"), San Francisco County Transportation Authority, and San Francisco Mayor's Office on Disability (collectively "San Francisco" or "SF") submit Additional Proposals on Track 5A related to the TNC Access for All Act (the "Act"). San Francisco proposes a new framework in response to the California Public Utilities Commission's ("CPUC" or "Commission") call for additional proposals on prescheduled wheelchair accessible vehicle ("WAV") trip performance metrics. San Francisco proposes the standard for prescheduled WAV service be defined within the framework adopted by the Commission for on-demand service, that they be based on comparable data for non-WAV service, and that the standards are designed to achieve prescheduled WAV service that is equivalent to prescheduled non-WAV service. San Francisco's proposed standards are explained in the following document and available as a whole in Exhibit A. San Francisco also requests clarity from the Commission and Lyft with regard to reporting of cancelled trips and notes that data reporting standards should be consistent across all Transportation Network Companies ("TNCs").

DISCUSSION

1. San Francisco proposes standards for prescheduled WAV service that are in alignment with the framework adopted by the Commission for on-demand service, based on comparable data for non-WAV service, and designed to achieve equivalent service between prescheduled WAV and prescheduled non-WAV trips.

San Francisco's approach prioritizes consistency with the on-demand standards framework and promotes equivalent service in line with statements from the Disability Advocates and broader disability community.[1] Furthermore, this approach is supported by the Commission's past statement

[1] Track 4 Proposals of Disability Rights Education and Defense Fund, Disability Rights California, and the Center for Accessible Technology (the " Disability Advocates' Track 4 Proposal"), filed April 23, 2021, at 7; Letter from San Francisco Mayor's Disability Council Co-Chairs to Uber, February 17, 2022.

that "performance metrics for pre-scheduled WAV trips should be based on an evaluation of existing pre-scheduled WAV and non-WAV trip data."[2]

In prior rulings, the Commission adopted on-demand standards which consist of the Trip Completion Standard (TCS), Offset Response Time Benchmark (ORTB)[3], the Offset Time Standard (OTS), and the Exemption Standard.[4],[5] Collectively, the TCS, ORTB, and OTS make up the standard for seeking offsets for on-demand service. The TCS ensures a minimum completion rate (CR), or share of requested trips that are completed. The ORTB sets a response time threshold, and the OTS sets a share of completed trips that must be served within the ORTB.

A. Definition of Response Times

Response times were defined for on-demand service in D. 21-11-004, and for prescheduled service in the Administrative Law Judge's Ruling on Additional Track 5A Proposals and Advice Letter Amendments filed on May 17, 2022. The two definitions represent two distinctly different metrics with different meanings: the former quantifies the time between when a passenger requests a trip and when they are picked up (regardless of whether the passenger was given an estimated pickup time and whether the TNC driver arrived at that time), while the latter quantifies the time elapsed from the scheduled pickup time to the actual time the driver arrives for pickup. To clarify the distinction, both technically and as it relates to customer experience, and to further distinguish between standards for on-demand service and prescheduled service, San Francisco proposes that the Commission adopt the term "pickup delay" in place of "response time" for prescheduled service. San Francisco's proposal and supporting data are described below for integrating the proposed "pickup delay"

[2] Assigned Commissioner's Ruling on Track 5A Issues and Data Submissions for Pre-Scheduled Trips ("Track 5A Ruling"), filed April 11, 2022, at 12.

[3] In D.20-03-007, the Commission adopted an Interim Offset Response Time Benchmark that is to be updated based on forthcoming analysis.

[4] Decision on Track 4 Issues, November 4, 2021, D.21-11-004, at 33.

[5] As SF has previously explained, the current Exemption Standard falls short of the statutory requirement that a TNC have "response times for 80 percent of WAV trips requested … within a time established by the commission for that geographic area." See SF's Comments on Proposed Decision on Track 4 Issues, filed October 21, 2021, at 2.

terminology. Note that neither response time nor pickup delay may be negative. In the case a driver arrives before the scheduled pickup time, the pickup delay is 0.

B. Proposed Offset Request Requirements

As the Disability Advocates have stated, the performance standard frameworks must be based on the principle of equivalent service, and "a TNC must offer pre-scheduled WAV trips if pre-scheduled rides are generally offered as part of the services provided via a TNC's 'online-enabled application or platform.'"[6] In keeping with this principle, San Francisco proposes the following Offset Request Requirements:

For any county and quarter a TNC seeks an offset, they must:

(a) provide the same types of WAV service in that county as they provide non-WAV service. In other words, if a TNC provides on-demand non-WAV service in a given county, they must also provide on-demand WAV service in that county, and if a TNC provides prescheduled non-WAV service in a given county, they must also provide prescheduled WAV service in that county, and;

(b) meet all of the offset-request requirements corresponding to the types of service provided.

C. Prescheduled WAV Offset Request Standard

Like the on-demand offset request standard, the Prescheduled WAV Offset Request Standard is proposed to be a combination of three elements: the Trip Completion Standard, which sets a minimum threshold for trips that must be completed; the Pickup Delay Benchmark, which sets a limit on pickup delays; and the Pickup Delay Standard, which sets the minimum share of trips that must be served within the Pickup Delay Benchmark. The following sections develop proposals for the three elements by examining prescheduled data filed by TNCs to the service list.

[6] Disability Advocates' Proposals on Track 5A Scoping Memo Questions, filed February 14, 2022, at 5.

i. Trip Completion Standard

As stated above, the Trip Completion Standard sets a minimum threshold for trips that must be completed. The Disability Advocates have explained the importance of a Trip Completion Standard in the past, noting that "[i]n order for people with disabilities to have access to reliable TNC rides within a reasonable time, the way that people without disabilities do, they must be confident that they can obtain service, and that the service will arrive in a reasonable amount of time."[7]

San Francisco developed the following Prescheduled WAV Trip Completion Standard based on the prescheduled WAV and non-WAV trip completion rates filed to the service list. Table 1 shows total requests, completed trips, and completion rates for pre-scheduled WAV and non-WAV service by county group in 2021. Note that San Francisco is the only county in county group A, and that the county groups were developed by the Commission. The table shows that the vast majority of prescheduled WAV service was provided in county group B, and that no prescheduled WAV service was provided in county group C. Prescheduled non-WAV service was similarly (but to a lesser extent) concentrated in county group B, but unlike WAV service, it was provided in all county groups, including extensively in county group C. It also shows that TNCs' current completion rates are higher for prescheduled WAV trips than prescheduled non-WAV trips in county groups A and B, but they are not providing prescheduled WAV service in any county group C counties.

Table 1: 2021 Prescheduled Requests, Completed Trips, and Completion Rates by County Group and Service Type

County Group	WAV Requests	WAV Completed Trips	WAV Completion Rate	Non-WAV Requests	Non-WAV Completed Trips	Non-WAV Completion Rate
A	80	76	95%	345,555	291,258	84%
B	1,464	1,328	91%	7,175,233	5,657,879	79%
C	0	0		1,242,887	955,423	77%
Statewide	1,544	1,404	91%	8,763,685	6,904,570	79%

[7] Disability Advocates' Track 4 Proposal, at 7.

Table 2 shows the completed prescheduled WAV and non-WAV trips that each TNC provided by county group in 2021. It shows that only Lyft and Zum provided prescheduled WAV trips.

Table 2: Completed Prescheduled Trips by County Group and Company in 2021

	County Group	HopSkipDrive	Kango	Lyft	Uber	Zum
WAV	A	0	0	75	0	1
	B	0	0	1,018	0	310
	C	0	0	0	0	0
Non-WAV	A	110	4,870	90,895	193,976	1,407
	B	136,499	11,201	2,307,875	3,154,162	48,142
	C	2,640	1,564	456,539	494,513	167

San Francisco proposes standards based on current non-WAV service levels, balancing attainability with service standards that increase over time. These proposed Prescheduled WAV Trip Completion Standards are shown in Table 2. Like the on-demand Trip Completion Standard adopted in Decision 21-11-004, the standard escalates each quarter starting with the first quarter an offset is requested until the 8th quarter. Unlike the on-demand standard, there are fewer steps spaced further apart, reflecting the relatively higher prescheduled non-WAV completions rates.

Table 2: Proposed Prescheduled WAV Trip Completion Standard

County Group	Quarters 1 to Quarter 3	Quarter 4 to Quarter 7	Quarter 8 and after
A	85%	90%	95%
B	80%	90%	95%
C	75%	85%	90%

To demonstrate improved level of service for offset eligibility for prescheduled WAV service, a TNC must demonstrate that it met or exceeded the applicable minimum percentage of prescheduled WAV trip requests completed.

ii. Pickup Delay Benchmark

As stated above, San Francisco proposes that the Commission adopt the term "pickup delay" in place of "response time" for prescheduled service. In accordance with the Commission's definition of response time for prescheduled trips, pickup delay is defined as the time elapsed from the scheduled pickup time to the actual time the driver arrives for pickup. Limiting pickup delay ensures that trips arrive in a timely fashion and that WAV users can rely upon prescheduled service.

San Francisco developed the following Pickup Delay Benchmark based on the prescheduled WAV and non-WAV response time data filed to the service list. Table 3 shows estimated industry-wide pre-scheduled non-WAV response time percentiles, from the 50th to 90th, by county group for all quarters in 2021. It shows that pickup delays in up through the 90th percentile were comparable for county groups A and B, and higher from county group C. Pickup delays for county groups A, B, and C were under 6 minutes, 8 minutes, and 22 minutes, respectively, for 90% of trips. It additionally shows that worst-case outcomes are extreme and highly variable. Worst-case pickup delay was just over 2 hours for county group A**, nearly 2 days late for county group B,** and almost 7 hours late for county group C. Because of these worst-case scenarios for pickup delay, San Francisco used the 90th percentile rather than the 100th percentile in developing a Pickup Delay Standard. Note that a true calculation of pickup delay percentiles across multiple quarters and different TNC companies would require trip-level reporting of pickup delay; there is no agreed-upon method for calculating combined percentiles from multiple subsets of percentiles reported in the quarterly data filings by the different TNC companies.[8] In this case, error may be introduced when aggregating across quarters, companies, and geographies. Standards should be set based on the state of the industry to avoid advantaging one company over another, or by setting standards too low, so we prepared the estimates in Table 3 with the limitations noted above.

[8] Responses by Uber, Lyft, Kango, HopSkipDrive, and Zum to Assigned Commissioner's Ruling Dated April 11, 2022. R.19-02-012.

Table 3: 2021 Prescheduled Non-WAV Percentile Pickup Delay by County Group (minutes)

County Group	50th	60th	70th	80th	90th	100th (worst-case)
A	0.0	0.2	1.9	3.1	6.0	125.7
B	0.0	0.0	1.0	3.5	7.5	2879.0
C	4.8	7.3	9.7	13.6	21.7	415.8

Table 4 shows the Proposed Pickup Delay Benchmarks, which are based on 90th percentile pickup delays in 2021 for the corresponding county group. Again, the 90th percentile pickup delays ensure that prescheduled trips are served within a reasonable window. Unlike the on-demand Offset Response Time Benchmark which contains Level 1 and Level 2 benchmarks, each associated with different percentage requirements, we propose a single benchmark level and a single set of percentage requirements for the sake of simplicity.

Table 4: Proposed Prescheduled Pickup Delay Benchmark

County Group	Pickup Delay Benchmark (minutes)
A	6
B	8
C	22

iii. Pickup Delay Standard

Table 5 shows the percent of WAV trips by county group that met the Proposed Prescheduled Pickup Delay Benchmark. Values in this table are shown to the nearest decile and based upon industry-wide estimates of pickup delay deciles for prescheduled WAV trips by county group in 2021, using the same method as deciles presented in Table 3 and subject to the same limitations. It shows that only approximately 50% of prescheduled WAV trips were fewer than 5 minutes late in county group A (whose sole county is San Francisco), and that approximately 90% of prescheduled WAV

trips were fewer than 8 minutes late in county group B (where the vast majority of prescheduled WAV trips occurred).

Table 5: Percentage of Completed WAV Trips within the Proposed Prescheduled Pickup Delay Benchmark

County Group	Pickup Delay Benchmark (minutes)	Percent of Trips within Benchmark	Total Prescheduled WAV Trips
A	6	50%	76
B	8	90%	1,328
C	22	N/A	0

Table 6 shows the Proposed Pickup Delay Standard. Like the on-demand Offset Time Standard adopted in Decision 21-11-004, the Proposed Pickup Delay Standard escalates each quarter starting with the first quarter an offset is requested until the 8th quarter, but with fewer steps given the already high level of service.

Table 6: Proposed Prescheduled Pickup Delay Standard

Quarter	Percentage of Completed Trips under Pickup Delay Benchmark
1st	80%
2nd	80%
3rd	85%
4th	85%
5th	90%
6th	90%
7th	95%
8th and after	95%

To demonstrate improved level of service for offset eligibility for prescheduled WAV service, a TNC must demonstrate that it met or exceeded the Pickup Delay Benchmark for a given quarter in a

given geographic area. The 1st Quarter percentages shall apply to the first quarter that a TNC submits an Offset Request for prescheduled WAV service in a given county. Once the schedule begins for a TNC in a given county, the schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request for prescheduled WAV service in that quarter.

iv. Prescheduled WAV Exemption Standard

In alignment with the Exemption Standard established by the Commission for on-demand WAV trips, San Francisco proposes a Prescheduled WAV Exemption Standard. This new exemption standard will allow TNCs to qualify for an exemption in part by providing prescheduled trips while also holding them accountable for providing high quality service to WAV uses who schedule their trips in advance.

San Francisco proposes that a TNC must meet the following requirements to qualify for an exemption:

a) At least 95 percent of its completed prescheduled WAV trips met or exceed the Pickup Delay Benchmark for a given geographic area for four consecutive quarters, and
b) The TNC qualified for an offset in the given geographic area for the same four consecutive quarters.

2. San Francisco proposes additional data reporting requirements to support Prescheduled WAV Trip data reporting.

As previously discussed, the percentile pickup delay data submitted separately by each TNC and segmented by county and quarter cannot be used to calculate true percentiles of pickup delay aggregated across TNCs, counties, or quarters. Individual trip data is required to calculate true industry-wide, county group percentiles. By simply adding scheduled pickup time to the *Requests Accepted* Annual Report Template, Commission staff could calculate pickup delay for each trip and accurately calculate percentiles at whatever segmentation is needed. Additionally, the Commission should confirm that the pickup time as currently reported is the time a vehicle arrives at a pickup location, rather than when the passenger enters the vehicle (for example when a vehicle arrives on-

time and waits 5 minutes for the passenger). If this is not the case, a second field should be added to distinguish the arrival time of the vehicle and the arrival time of the passenger at the pickup location.

3. San Francisco notes inconsistencies in data reporting and respectfully requests that the CPUC clarify and standardize reporting standards for all TNCs.

In a June 6, 2022 email to the Administrative Law Judges (ALJs) and R.19-02-012 Service List, San Francisco noted unexpected outcomes in Lyft's reported trip data, explaining that "[i]t would be expected that (a) requested = (b) completed + (c) not accepted + (d) cancelled as no-show + (e) cancelled by passenger + (f) cancelled by driver."[9] In response, Lyft stated in a June 8 email that during a meeting with CPED staff, "Lyft advised staff that a single requested Lyft trip may have multiple cancellations by a driver(s) and/or rider and requested guidance from staff concerning how this information should be reflected in Lyft's May 9th data submission. Staff advised Lyft to include all cancellations per single requested trip."[10] San Francisco then requested further clarification from the ALJs in a June 9 email:

1. San Francisco's understanding was that a single trip request can only be cancelled once. It would be helpful for CPED staff to:
    a. Confirm exactly what guidance was provided to Lyft; and
    b. Explain in plain terms to all parties how it is possible to have multiple cancellations per single requested trip.
2. How does Lyft calculate the response time for trip requests with more than one cancellation? This is important to ascertain a) whether the Commission's adopted definition of "response time" for a pre-scheduled trip is applicable to trip requests with multiple cancellations and b)

[9] R.19-02-012 Track 5A Pre-Scheduled WAV & non-WAV Data and Request for Extension, June 6, 2022 in Administrative Law Judge, E-mail Ruling Requesting Additional Information and Granting Extension of Time for Track 5A Proposals ("E-mail Ruling"), filed June 13, 2022, at 12.

[10] RE: R.19-02-012 Track 5A Pre-Scheduled WAV & non-WAV Data and Request for Extension, June 8, 2022 in E-mail Ruling, at 9.

whether parties would like to propose a revised definition of "response time" in their proposals in light of any new information.

3. The data reported by other TNCs does not contain evidence of counting multiple cancellations per single requested trip. If this was CPED's direction to Lyft, was it also communicated to other TNCs?[11]

On June 13, ALJ Debbie Chiv requested additional information from Lyft and Uber.[12] In Lyft's response, they state that "[a]fter a passenger requests a ride and it is accepted by a driver, either the passenger or the driver can cancel the ride. If the driver cancels the ride, the ride is automatically dispatched to another driver who can then accept or cancel the ride. This creates the potential for a single ride to be subject to multiple cancellations."[13] In other words, Lyft reports interim cancellations as trip cancellations, rather than only reporting the terminal status of the trip. This has led to a higher number of reported cancellations than actual cancelled trips. Uber, meanwhile, only records the final action (e.g. completed trip, driver cancellation, passenger cancellation), reporting one outcome per trip.[14] Uber notes that their methodology is "[i]n accordance with the CPUC's templates for quarterly data submissions."[15]

Without consistency in reporting standards, a cancelled trip request has different meanings depending on which TNC is reporting. San Francisco was under the impression that a "cancelled" trip meant that the trip request did not result in a trip, and that the request is closed. This is how Uber reports cancellations, but not Lyft. San Francisco is concerned that TNCs are reporting data differently and that they may have received different guidance on how to report. San Francisco reiterates its request for consistency in reporting standards.

[11] [EXTERNAL] RE: R.19-02-012 Track 5A Pre-Scheduled WAV & non-WAV Data and Request for Extension, June 9, 2022 in E-mail Ruling, at 6.

[12] R.19-02-012_E-Mail Ruling Requesting Additional Information and Granting Extension of Time for Track 5A Proposals, June 13, 2022 in E-mail Ruling at 3.

[13] Lyft, Inc.'s Responses Pursuant to June 6, 2022 Order of Administrative Law Judge Chiv, filed June 17, 2022, at 2

[14] Uber Technologies, Inc. Response to Administrative Law Judge's June 13, 2022 E-mail Ruling Requesting Additional Information and Granting Extension of Time for Track 5A Proposals, filed June 17, 2022, at 1-2.

[15] *Id.*, at 1.

In addition, San Francisco notes that there should be consistency in how the reason the trip was not accepted is reported in the Annual Report. In the Annual Report, a trip is associated with the Driver and the Vehicle they are using. San Francisco is unclear on how multiple actions that result in the "trip not being accepted" would be reported in the "Requests Not Accepted" report and respectfully requests that Lyft and the Commission provide clarification on reporting practices. The TNC Annual Report Templates and Data Dictionary should be updated as needed.

Furthermore, San Francisco reiterates Question 2 from its June 9 email: "How does Lyft calculate the response time for trip requests with more than one cancellation? This is important to ascertain a) whether the Commission's adopted definition of "response time" for a pre-scheduled trip is applicable to trip requests with multiple cancellations and b) whether parties would like to propose a revised definition of "response time" in their proposals in light of any new information."[16] In the ALJ response, ALJ Chiv stated that "we note that response time is defined as 'the time elapsed between when a WAV ride was requested and when the vehicle arrived,' as established in Ordering Paragraph 2 of D.20-03-007."[17] Respectfully, this does not address San Francisco's question. In an instance where a trip is cancelled multiple times before ultimately being completed, does Lyft reset the request time every time the trip is dispatched to a new driver? In other words, does Lyft restart the response time clock after a cancellation? Such an approach could significantly lower Lyft's response times. Therefore, San Francisco seeks clarification from Lyft regarding the calculation of response times for both on-demand and prescheduled trips with more than one cancellation.

Finally, in light of Lyft's recent statements regarding its reporting of trips with multiple driver cancellations, San Francisco proposes an update to both the on-demand and prescheduled reporting templates. San Francisco suggests that the Commission add an additional field to capture the number of drivers who were dispatched requested trips, regardless of whether the trips were ultimately completed. This additional data would help interested parties better understand the experience of riders, who may encounter multiple driver cancellations in the course of attempting to find a ride.

[16] [EXTERNAL] RE: R.19-02-012 Track 5A Pre-Scheduled WAV & non-WAV Data and Request for Extension, June 9, 2022 in E-mail Ruling, at 6.

[17] R.19-02-012_E-Mail Ruling Requesting Additional Information and Granting Extension of Time for Track 5A Proposals, June 13, 2022 in E-mail Ruling, at 3.

4. San Francisco supports the CPUC's prior rulings regarding the definition of on-demand transportation.

In the Track 5A Proposed Decision, the Commission noted that the definition "may be further addressed in subsequent Track 5A proposals."[18] San Francisco supports the Commission's ruling that "at this time, it is unnecessary to modify the definition of 'on-demand transportation.'"[19]

[18] Track 5A Ruling, at 5.

[19] *Id.*.

Exhibit A: Prescheduled WAV Performance Metric Proposals

Proposed Offset Request Requirements

For any county and quarter a TNC seeks an offset, they must:

a) provide the same types of WAV service in that county as they provide non-WAV service. In other words, if a TNC provides on-demand non-WAV service in a given county, they must also provide on-demand WAV service in that county, and if a TNC provides prescheduled non-WAV service in a given county, they must also provide prescheduled WAV service in that county, and;

b) meet the all offset-request requirements corresponding to the types of service provided.

Proposed Prescheduled WAV Trip Completion Standard

County Group	Quarters 1 to Quarter 3	Quarter 4 to Quarter 7	Quarter 8 and after
A	85%	90%	95%
B	80%	90%	95%
C	75%	85%	90%

To demonstrate improved level of service for offset eligibility for prescheduled WAV service, a TNC must demonstrate that it met or exceeded the applicable minimum percentage of prescheduled WAV trip requests completed.

Proposed Prescheduled Pickup Delay Benchmark

County Group	Pickup Delay Benchmark (minutes)
A	6
B	8
C	22

Proposed Prescheduled Pickup Delay Standard

Quarter	Percentage of Completed Trips under Pickup Delay Benchmark
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2nd	80%
3rd	85%
4th	85%
5th	90%
6th	90%
7th	95%
8th and after	95%

To demonstrate improved level of service for offset eligibility for prescheduled WAV service, a TNC must demonstrate that it met or exceeded the Pickup Delay Benchmark for a given quarter in a given geographic area. The 1st Quarter percentages shall apply to the first quarter that a TNC submits an Offset Request for prescheduled WAV service in a given county. Once the schedule begins for a TNC in a given county, the schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request for prescheduled WAV service in that quarter.

Prescheduled WAV Exemption Standard

a) At least 95 percent of its completed prescheduled WAV trips met or exceed the Pickup Delay Benchmark for a given geographic area for four consecutive quarters, and
b) The TNC qualified for an offset in the given geographic area for the same four consecutive quarters.

Dated: June 30, 2022

Respectfully submitted,

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