



April 25, 2018

Commissioner Liane M. Randolph
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

RE: Sharing of Rides in Autonomous Vehicles – PUC Proposed Decision Authorizing a Pilot Test Program for Autonomous Vehicle Passenger Service

Dear Commissioner Randolph:

On behalf of TransForm, the state's largest nonprofit organization dedicated to sustainable and equitable transportation and land use policies, I am writing to express our concern regarding a key element of the PUC's April 6 Proposed Decision Authorizing a Pilot Test Program for Autonomous Vehicle (AV) Passenger Service.

AVs have the potential to save thousands of lives, reduce congestion and negative environmental impacts, provide access to affordable transportation to the elderly, disabled and economically underserved, and reorient the design and function of the cities across the country around its residents not its vehicles.

The potential of AVs to expand ridesharing and reduce the need for car ownership is a critical factor in California's ability to meet its aggressive climate and air quality goals. California is home to three of the five most congested cities in the country and in order to reduce the state's rate of single-occupant vehicle trips, we need to aggressively promote shared rides as the default choice for AV transportation.

The PUC's proposed ban on shared rides during AV testing unfortunately runs counter to this goal and risks undermining an important opportunity to reduce carbon emissions. It is critical that we do everything we can to encourage, not discourage, shared rides.

TransForm believes that the full environmental benefits of AV technology can only be realized through such vehicles deployed on a platform where individual trips are pooled together. Our position on the use of AV technology to meet climate goals aligns with the principles detailed in the National Association of City Transportation Officials' Blueprint for Autonomous Urbanism¹. These principles include the specific intent to move more people with fewer vehicles with safety as the top priority.

Ridesharing services like Lyft Line that group multiple people in one car are changing that by making carpooling more accessible and convenient than ever. This success should be extended without interruption to AVs. Unless amended, the PUC's proposed Driverless AV Passenger Service rules only induce more single-occupant vehicles on our already congested roads and highways.

¹ <https://nacto.org/publication/bau/principles-for-autonomous-urbanism/>

The environmental benefits of AV technology when paired with ridesharing platform are substantial. By 2025, Lyft estimates that its shared platform will provide at least 1 billion rides per year using electric autonomous vehicles and will reduce CO2 emissions for the U.S. transportation sector as a whole by at least 5 million tons per year. These critical advances can only be achieved if Californians continue to increasingly view sharing a ride with someone with a similar destination as the default.

Ridesharing companies have also introduced a number of new technologies designed to keep riders safe. For example, all rides are tracked via GPS from start to finish and passengers can share their route and ETA with friends and family easily from their smartphones. Passengers also receive a photo of the vehicle's make and color and the license plate number and transactions are handled through the app with no need to handle or carry cash. These advances to protect consumer safety will continue to help ensure catching a safe ride home is easier than ever before—whether you are ridesharing with a driver or in an AV.

We urge the PUC to remove the ban on shared rides from the proposed decision on AVs to avoid encouraging solo trips and, in turn, missing a critical opportunity to reduce traffic congestion and carbon emissions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Clarrissa", with a long horizontal flourish extending to the right.

Clarrissa Cabansagan, TransForm
New Mobility Policy Director