BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on Regulations Relating to Passenger Carriers, Ridesharing, and New Online-Enabled Transportation Services.	Rulemaking 12-12-011 (Filed *December 20, 2012)*

OPENING COMMENTS OF SAN FRANCISCO COUNTY TRANSPORTATION AUTHORITY TO ORDER INSTITUTING RULEMAKING 12-12-011

Tilly Chang

Executive Director

San Francisco County Transportation Authority

1455 Market Street, Floor 22, San Francisco, CA 94103

Tel: 415-522-4800

E-mail: tilly.chang@sfcta.org

July 14, 2017

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on Regulations Relating to Passenger Carriers, Ridesharing, and New Online-Enabled Transportation Services.	Rulemaking 12-12-011 (Filed *December 20, 2012)*

OPENING COMMENTS OF THE SAN FRANCISCO COUNTY TRANSPORTATION AUTHORITY TO ORDER INSTITUTING RULEMAKING 12-12-011

I.   Introduction

In accordance with Rule 6.2 of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure ("Rules"), the San Francisco County Transportation Authority (SFCTA) submits comments to the Order Instituting Rulemaking 12-12-011 ("Rulemaking").

The SFCTA, as a Congestion Management Agency for the County of San Francisco is charged with programming and allocating federal, state and local funds; monitoring congestion and preparing a bi-annual CMP; maintaining a database of trips and travel demand modeling tool; and using these data and tools to develop San Francisco's long range transportation plan. The SFCTA also manages the San Francisco Chained Activity Modeling Process (SF-CHAMP), the official travel forecasting tool for San Francisco. SF-CHAMP is an analytical tool that can be used to estimate the benefits and impacts of transportation and land use projects and policies. The ability to accurately estimate these outcomes depends on having objective data about the availability and usage of transportation network alternatives, such as market size, origin and destination data, trip lengths, vehicle occupancy, and costs.

In June 2017, the SFCTA released a draft report, TNCs Today: A Profile of San Francisco Transportation Network Company Activity, which estimated the number, location, and timing of intra-San Francisco TNC trips. The full report can be found at www.sfcta.org/tncstoday. Prior to the release of TNCs Today, no useful information about TNCs was available. This report revealed that TNCs comprise a significant share of travel within San Francisco, as measured by vehicle trips and vehicle miles traveled, and that TNC trips occur primarily in the most congested areas of the city, and the most congested times of day. However, this TNC information is insufficient to fulfill model estimation, calibration, and application requirements and highlight the magnitude of the need for high-quality, detailed, longitudinal TNC data.

The SFCTA believes it is critical to our mission, and in the public interest to have access to high-quality, detailed, longitudinal TNC data. Other transportation sectors are already required to report highly detailed data.

In San Francisco, like many other cities within California and throughout the country, taxi companies are required to provide detailed telemetry and usage data. That data includes pickup location, dropoff location, pickup time, dropoff time, fare, distance, occupancy, telemetry/gps data and is transmitted in real-time through an API to the San Francisco Municipal Transportation Agency (SFMTA). Similarly, the SFMTA collects detailed automated passenger counter (APC) and automated vehicle location (AVL) data for their transit fleet. TNCs, as demonstrated by TNCs Today, are a substantial portion of the overall transportation market and should similarly report highly spatially and temporally detailed and longitudinal data.

II.   Questions Presented

1.   What is the public and/or research value of a website, database, or other publicly accessible means to host data about transportation for hire that is under the Commission's jurisdiction?

As demonstrated by TNCs Today, on a typical weekday TNCs make more than 170,000 vehicle trips within San Francisco (estimated to be 15% of all vehicle trips and 9% of all person trips) and tend to operate during the most congested times of day in the most congested areas of the city:

- Approximately 15% of TNC vehicle trips occur during the peak morning period between 7am and 10am and approximately 23% of TNC vehicle trips occur during the peak evening period between 5pm and 8pm.
- Approximately 48% of those trips begin or end in the downtown core where congestion is greatest.

The Commission should provide access to detailed data to enable transportation planning agencies such as the SFCTA to perform comprehensive analysis of TNCs in order to understand how many vehicles are on the streets, and where and when they operate. Such analysis will support ongoing SFCTA responsibilities including congestion monitoring, development of the Countywide Transportation Plan which considers impacts to congestion, transit operations, and street safety; preparation of neighborhood transportation improvement studies that provide targeted improvement roadmaps for our communities; and supporting capital grant programming and planning which funds multimillion dollar expenditures that affect regional transportation outcomes.

Detailed data will also help us understand the following:
- Corridor-level traffic speeds and volumes
- Traffic congestion and flow on specific streets
- Air quality and GHG impacts, at city and neighborhood scale
- Concentration of loading and unloading activity
- Potential transit gaps or areas for service improvements
- Amount of service provided to disabled riders
- Trends over time
- Vehicle miles traveled

The SFCTA proposes that the Commission produce detailed trip records along with telemetry including at least the following level of detail:
- Trip Records
  - vehicle id
  - vehicle availability timestamp
  - vehicle availability location (lat/lon)
  - ride acceptance timestamp

- ride acceptance location (lat/lon)
- pickup timestamp
- pickup location (lat/lon)
- dropoff timestamp
- dropoff location (lat/lon)
- available to ride-accept miles
- ride-accept to pickup miles
- pickup to dropoff miles
- product type (individual ride/pooled ride)
- fare paid
- surge / peak price multiplier
- party size
- is vehicle wheelchair-accessible
- passenger has wheelchair

- Telemetry Records
  - vehicle id
  - timestamp
  - location (lat/lon)
  - acceleration
  - status (available, hired, occupied)
  - number of passengers
- Cancelled or declined trip records
  - driver id
  - timestamp
  - driver location
  - ride acceptance location
  - requested pickup location
  - requested dropoff location
  - wheelchair requirement of requestor
- Driver information
  - Insurance status

- o Background check status
- o Safety / accident data

2. **What has been the effectiveness of third-party hosted websites that provide data about Commission programs?**

The Commission should identify third-party websites that provide data about Commission programs, identify measures of effectiveness of these websites, and summarize these measures over time. The SFCTA does not have information about third-party hosted websites providing data about the Commission, and thus cannot directly respond to this question.

However, we can provide several examples of high-quality data portals which make useful San Francisco data available to the public. Examples include:

- DataSF (https://datasf.org/opendata/) provides a broad range of data accessible to planners and public including transportation, city infrastructure, and land use data.
- The Performance Monitoring System (PeMS) (http://pems.dot.ca.gov/) provided by Caltrans provides extensive data that is widely used by planners throughout California.
- TransBASE (http://transbasesf.org/transbase/) provides active transportation and safety data.
- The Statewide Integrated Traffic Records System (SWITRS) (http://iswitrs.chp.ca.gov/) collects and makes available data from traffic collisions.

3. **What concerns, if any, are there about the ability of a Commission-sponsored website to protect customer privacy and market sensitive data?**

While protecting customer privacy and market sensitive data are reasonable concerns, there are many common practices and strategies for protecting sensitive data, including non-disclosure agreements, anonymization of data, and aggregation of data. The SFCTA believes that the public interest of this data must be considered along with the value of protecting customer privacy and market sensitive data. The availability of TNC information is in the public interest because TNCs operate on public streets and impact congestion, transit operations and ridership, and safety. Historical, longitudinal TNC data should be provided, along with current data on an

ongoing basis, to enable agencies to understand trends, and the relationship between these trends and changes in congestion, transit operations and ridership, and safety over time.

The public interest in TNC data and the needs of public agencies are aligned, but not identical. Broadly, it is in the public interest to have data freely available, in this case in order to understand trends in the TNC market and how it relates to their own personal experiences. Public agencies like the SFCTA are tasked with planning future investments and developing policy recommendations and supporting other citywide goals and principles such as safety and equity. Public agencies, therefore, require *detailed* data in order to understand the interactions between transportation markets (do the compete or complement transit? are they adding to, or alleviating congestion?), trends in those markets (which modes are growing and shrinking?), safety implications (are drivers properly ensured? are drivers properly trained? are there dangerous conflicts with bicycles, pedestrians, and other vehicles?) It should be noted that these data can also help to serve the industry's goals and interests as well, to help make the case for improvements or regulations that they seek and to provide certainty to all parties who may wish to invest or operate in the sector.

The preferred approach to protecting data would be to release full detailed data only to government agencies, protected by a non-disclosure agreement (NDA) which limits the level of detail which may be released to the public. This would protect sensitive personally-identifiable or market-sensitive data from access by the public or competitor services while enabling agencies the most analytical flexibility. The California Household Travel Survey (CHTS) is an example of an extremely valuable travel behavior data source, with fully detailed data released only on a limited basis to parties who have signed NDAs. The SFCTA has used CHTS data, which includes home and work location information and detailed household structure and demographic data to estimate travel behavior models used to predict the effects of transportation and land use projects and policies. Similarly, these data have been shared with other local and state agencies, as well as private sector parties working for these agencies.

Data could be released to the public in an aggregated and / or anonymized form.

4. **What characteristics or design specifications are needed to ensure that a Commission-sponsored website would be flexible enough to adjust to future legislative action including, but not limited to: new background check standards that are germane to the Commission's jurisdiction over TNCs?**

Concern over future legislated reporting requirements should not preclude or impede the production of data already being collected. However, to the extent that future anticipated reporting requirements are expected to have a relationship with existing data (for example, a driver's background check records linked to that driver's trip records), the Commission should ensure that the data is collected with a persistent key that can link the records together. Each driver should be assigned a persistent, anonymous key to identify associated records, however, sensitive information about the driver's identity beyond general demographic information should not be produced.

5.   Should the Commission share TNC trip data with interested California governmental entities?

Yes. Access to objective transportation data is fundamental to the responsibilities of transportation planning agencies. Detailed data is necessary to meet the wide range of responsibilities and needs of these agencies. The SFCTA's TNCs Today report, alongside Schaller Consulting's report, Unsustainable, demonstrates TNCs are a substantial portion of the overall transportation market, particularly in urban areas; however, the actual size of this market in most jurisdictions is completely unknown. Without that basic information it is impossible to begin to understand impacts to congestion, transit operations and ridership, safety, vehicle miles traveled and greenhouse gas emissions.

6.   What factors should the Commission take into account in determining if TNC trip data should be shared with interested California governmental entities?

The Commission should consider the needs and responsibilities of governmental agencies, as well as the public interest that would be served by enabling planning agencies to make fully-informed planning and policy recommendations. Public agencies are tasked with planning billions of dollars of investments in transportation infrastructure and services every year, and developing policy recommendations. It is critical to their mission to have access to high-quality, longitudinal data. As demonstrated by TNCs Today, TNCs are a huge component

of the overall transportation market in San Francisco, about which almost no data is currently available, and none is available on an ongoing basis.

7.   What steps should the Commission consider implementing to protect the market sensitivity of trip data?

The Commission should consider releasing fully detailed data only under NDA to public agencies with a legitimate public planning interest in the data. To the extent that data is release to the public, it should be aggregated and anonymized. Furthermore, the Commission should not distinguish between Uber and Lyft in publicly available data.

Dated: July 14, 2017

Respectfully submitted,

 /s/ Steve Stamos

Steve Stamos

Clerk of the Board

San Francisco County Transportation Authority

Tel: 415-522-4817

E-mail: clerk@sfcta.org