



Media Release: Immediate

Regional Municipality of Waterloo
Licensing and Hearings Committee
Public Input Meeting
Consolidated Agenda

Tuesday, April 5, 2016

6:00 p.m.

Regional Council Chamber

150 Frederick Street, Kitchener, Ontario

* Denotes items not part of original agenda

1. Declarations of Pecuniary Interest under the “Municipal Conflict Of Interest Act”

2. Delegations

- * ~~Chris Schafer~~ Adam Blinick, Policy Lead, [Uber Canada](#) 3
- 2. Ajmer S. Mandur
- * ~~Bill Chester~~ Tony Rodrigues, and ~~Terry Kirby~~ Tim Kirby, Waterloo Region Taxi Alliance
- * 4. Terry Kirby, City Cabs
- * 5. Peter Neufeld, Waterloo Taxi
- * 6. Bill Chester, Golden Triangle Taxi
- 7. Serge Stefanovic
- * ~~Brenda Quance~~ Prem Gururajan, Rideco

- 9. Jake Hishon
- 10. Robert Heinbecker
- 11. Sue Morgan
- 12. David Nikolic
- 13. Brian Ruxton
- 14. Michael Druker, TriTag
- 15. Felicia James
- * 16. Paul Herriot
- * 17. Jason Jeyanandan, Obsidian Delta

The following delegation has 3 minutes to speak:

- * 18. Robert Stephens

3. Call for Delegations

4. Other Business

5. Adjourn

March 28, 2016

Region of Waterloo
150 Frederick St.
P.O. Box 9051, Station C
Kitchener, ON N2G 4J3

Dear Regional Council and Staff,

**RE: TAXI BY-LAW REVIEW - PUBLIC CONSULTATION DISCUSSION GUIDE PHASE 2
(SPRING/SUMMER 2016)**

In reply to the Taxi By-Law Review Public Consultation Discussion Guide Phase 2 and the 7 issues it outlines, please see the table below.

Uber Canada is supportive of the “staff preferred” options with respect to the 7 identified issues.

	Staff Preferred Option	Ridesharing Best Practices
Issue 1: Should the Region regulate taxi and taxi type services in Waterloo Region?	That the Region regulates all taxi and taxi type services.	<p>□ While the Motion introduced by Regional Councillor Sean Strickland and endorsed by Regional Council to request that the Province pass legislation and/or regulations to provide a standardized approach for the Province to address apps such as Uber is productive, the work by the Region of Waterloo to review and update existing taxi and limo regulations to include ridesharing is equally productive and encouraging.</p> <p>The Region regulating Uber is an opportunity to re-examine the regulations governing the taxi and limo industries and make necessary changes to reduce the regulatory burden on them and help them be more competitive in a changing ground transportation industry.</p>
Issue 2: Should the Region “open” its taxi by-law so non traditional taxis are licensed and regulated?	That the by-law be opened to allow for non-traditional taxis.	<p>□ The “sharing-economy” is all about better allocation of things like housing and cars. It doesn’t make sense for cars to sit unused for the vast majority of the day. A whopping 96 percent of cars are parked, unutilized, taking up valuable urban space, at any given time. Uber lets people push a button and get a ride, reducing the need for personal vehicle</p>

		<p>ownership, and freeing up those parking spaces spaces for better uses, like another lane, a park, or neighborhood shops.</p> <p>Opening the by-law to allow for “non-traditional taxis” facilitates possibilities of what the future in the Region can be from a transportation perspective. Including ridesharing and other technology in the Region’s Transportation Master Plan is indicative of the broad and inclusive conversation taking place in the Region today.</p> <p>UberPOOL is a prime example of a forward looking Uber product that matches riders who are heading in the same direction in real time. When this happens at-scale, cities will reap the benefits of having fewer cars on the road, with reductions in both congestion and emissions. UberPOOL (think tech enabled carpooling), is currently available in Toronto and a host of other international cities.</p>
<p>Issue 3: If the Region opens its taxi by-law should it adopt a “traditional model”, “broker model” or a “hybrid model”?</p>	<p>Develop a by-law based on a hybrid model that combines both the traditional and broker models.</p>	<p>□ The key change with ridesharing regulations is the move from dual-licensing (with companies and drivers both needing a license) to a unified regime where only companies are licensed and where anyone can become a driver so long as they meet/pass the standard criteria (background checks, motor vehicle reference checks, etc.).</p> <p>Separate requirements on drivers do not provide additional safety benefits, but will create unnecessary barriers to entry to people who only want to drive for a few hours each week and will benefit from this kind of flexible work.</p>
<p>Issue 4: Should the Region limit the number of owner and vehicle licences for taxis services?</p>	<p>Phase out license limits on traditional taxis and do not impose limits on new entrants into the market.</p>	<p>□ Flexible supply and dynamic pricing on the Uber platform enables drivers to come on the road when they are needed which increases operational efficiency and productivity in contrast to having an increased number of taxis on the road at all times increasing congestion.</p> <p>Flexible supply best meets consumer demand</p>

		<p>(No supply caps):</p> <ul style="list-style-type: none"> • Cities and residents should enjoy transportation alternatives that are reliable at all times of day in all communities. • Traditionally underserved communities get greater access to reliable and affordable transportation. For example, in a mature Uber market like Chicago, four in ten trips begin or end in what the city has deemed to be traditionally underserved neighbourhoods. • Uber teams track major events and peak demand periods to proactively encourage partners to be on the platform to serve riders. <p>In cities across Canada, traditional taxi regulations restrict entry by requiring a license to operate a taxi. This limits the supply of available taxis in a city. While taxis are an integral component of the urban transportation network of any city, and will remain so into the future, the main effect of such supply restriction, is that prices remain high, taxis wait times are longer, among other undesirable policy outcomes.</p> <p>Regulating ridesharing is an opportunity to re-examine the regulations governing the taxi and limo industries and make necessary changes to reduce the regulatory burden on them and help them be more competitive in a changing ground transportation industry.</p>
<p>Issue 5: Should the Region regulate fares for taxi services?</p>	<p>Set fares for taxis that provide a “hail” service but do not impose a fee for a pre-booked service.</p>	<p>▫ Uber’s algorithms monitor demand and supply in real time all over a city. When our systems notice an increase in wait times (because there aren’t enough drivers nearby), surge pricing automatically kicks in. This has two effects: people who are not in a hurry wait until the price falls—reducing demand; and drivers who are nearby go to that neighborhood to get the higher fares—increasing supply. As a result, the</p>

		<p>number of people wanting a ride and the number of available drivers starts to balance out, ensuring that wait times do not increase.</p> <p>Uber uses fare multipliers—1.5X the standard fare, 2X, and so on—to balance supply and demand. The system updates the multiplier every five minutes to adjust the fares in light of the the latest conditions. If wait times continue to rise, the multiplier rises; when wait times fall, the multiplier falls. To ensure that any fare increase is accurate and effective, Uber divides cities into zones called “geofences”.</p> <p>Uber riders always know the price (base fare + time and distance) of a ride in app in advance of making a ride request.</p> <p>Uber also provides an “estimate your fare” feature so riders can always check the price in advance from where they are to where they are going.</p> <p>When the multiplier is unusually high, riders will be asked to manually type-in the multiplier to ensure they really are OK to pay the higher fare.</p>
<p>Issue 6: How should the Region govern and require accessible taxis?</p>	<p>No preferred option at this time.</p>	<p>In Edmonton, the first City to pass ridesharing regulations in Canada, if Uber or a Transportation Network Company (TNC) does not offer an accessible option approved by the City Manager, an additional fee is levied by the city.</p> <p>In Toronto, Uber offers uberWAV (wheelchair accessible vehicle with hydraulic lift and ramp) and in Toronto and Ottawa currently, Uber offers uberASSIST (door to door rather than simply curb to curb for those requiring extra assistance such as older persons, injured persons, etc.). Local market conditions determine the ability of ridesharing companies like Uber to offer these products in various markets.</p> <p>With VoiceOver iOS and wireless braille display compatibility, the Uber app provides a safe and</p>

		<p>reliable transportation option for the blind and visually impaired community.</p> <p>Uber designed product innovations to further economic opportunity for our deaf and hard of hearing driver partners. Visible and vibrating alerts aid deaf and hard of hearing riders, and in-app features such as the ability to enter destination ensure effective communication from the rider to the driver partner.</p>
<p>Issue 7: Should the Region require CCTV's in all vehicles?</p>	<p>Require the use of cameras only when a ride is a hailed ride, cameras would not be required when the ride is pre-booked.</p>	<p>▫ Security cameras are necessary for taxis because of the nature of taxis business model. Whether someone calls a broker, street hails, or gets a taxi at a taxi stand, the passenger remains anonymous to the taxi brokerage and driver. When passengers are anonymous and drivers carry cash, security cameras are necessary.</p> <p>With uberX, trips are no not anonymous. When a driver-partner accepts a request, a rider sees his or her first name, photo, vehicle model, and license plate number.</p> <p>In cities across Ontario, limousines are not currently required to have in vehicle cameras because, like TNCs (Uber), the limousine model is based on prearrangement between two parties that must identify themselves.</p> <p>The Ottawa Policy Options paper notes that, "...there have not been any incidents which would suggest cameras should be a requirement under the amended regulation". The City of Calgary and Edmonton in their ridesharing regulations is not making it a requirement that Transportation Network Companies (TNCs) like Uber have security cameras in ridesharing vehicles for these reasons.</p> <p>In addition, uberX is also a cashless platform, which means drivers do not need to carry cash in vehicle, every trip is GPS monitored, and each trip is subject to in app feedback</p>

		<p>mechanisms (that include the ability to provide written feedback after each trip) that is monitored and responded to in real time by Uber.</p>
--	--	---

Other Issues:

The Taxi By-Law Review Public Consultation Discussion Guide identifies a number of more detailed issues that will need to be resolved at a later date. Outlined below are responses to the other issues listed.

	<p align="center">Ridesharing Best Practices</p>
<p>Level and type of driver screening</p>	<p>Uber’s background checks use CPIC to search the National Repository of Criminal Records and PIP to search local police records.</p> <p>Uber’s background check uses the same checks as Girl Guides of Canada and other national and provincial organizations.</p> <p>Uber driver partners are also subject to a local police check, provincial motor vehicle reference check for ticketable offences, 26-point vehicle inspection by certified mechanic, and insurance.</p> <p>Trips are not anonymous When a driver-partner accepts a request, a rider sees his or her first name, photo, vehicle model, and license plate number. Riders can also check whether others have had a good experience with him or her.</p> <p>Share your location Riders can easily share their trip details -- including the specific route and estimated time of arrival -- with selected friends or family at the touch of a button.</p> <p>Feedback and ratings after every trip Riders and driver-partners are asked to rate each other and provide feedback for every trip before requesting or accepting another ride.</p>

	<p>24/7 support If riders or driver-partners have any questions about their trip, or if they need to report an incident, our customer support team is ready to respond to any issues.</p> <p>Rapid response We have a dedicated Incident Response Team to answer any urgent issues. If we receive a report that there has been an accident or incident, we can suspend the relevant parties and prevent them from accessing the platform until the matter is resolved.</p> <p>Contact drivers without providing personal information Uber uses technology that anonymizes riders' and driver-partners' phone numbers so that they do not have each other's real contact details.</p> <p>Always on the map Global Positioning System (GPS) data for all rides on the Uber platform are logged so we know which driver-partners and riders are riding together and where they are for the duration of their trip. GPS also enables us to verify the efficiency of every route being used, which creates accountability and a strong incentive for good behaviour.</p>
<p>Vehicle requirements e.g. age, inspection</p>	<p>Uber vehicles are not permitted to be more than 10 years old on the platform. Given that a majority of Uber driver partners drive less than 10 hours a week on the platform, ridesharing vehicles are subject to less wear and tear than traditional taxis that are generally on the road 24-hours a day (two 12-hour driver shifts).</p> <p>In Edmonton, Uber's annual 26-point vehicle inspection conducted by any provincially certified auto mechanic is accepted and compliance confirmed via audit by City.</p> <p>In addition, after each trip, riders can provide real-time feedback on trips by rating drivers on a 5-star rating system, in addition to providing written feedback on trips that is monitored and responded to by Uber 24-hours a day.</p>
<p>Vehicle identification e.g. car markings, top signs</p>	<p>In a large majority of markets in which ridesharing/Uber is regulated in the U.S., decals or vehicle identification is not required. It is often not required due to the fact that an Uber passenger already receives the picture of the driver, name of the driver, make and model of the vehicle and driver plate licence</p>

	<p>number when making a request for a ride on the Uber platform.</p> <p>Making a decal or identifier mandatory on Uber vehicles presents the possibility that drivers not affiliated with Uber (in addition to be subject to the background check and vehicle inspection requirements of the Uber platform) may try to use a decal to street hail passengers similar to ways in which “bandit” cabs currently street hail passengers.</p> <p>With respect to street enforcement by bylaw officers, enforcement officers can be provided with dedicated rider accounts that could be used to order Uber rides for compliance purposes. Uber Driver partners would not know who is ordering a ride when they receive a request.</p>
<p>Payment options e.g. Cash, credit card, pre-set accounts</p>	<p>Uber only accepts electronic forms of payment.</p> <p>Because payments can be made automatically and securely via electronic methods such as a credit card or PayPal account on file, riding with Uber significantly reduces the potential risk and conflict that can stem from disputed fares, lack of cash, or fare evasion. This is particularly good for drivers because carrying large quantities of cash can make them a target for crime.</p>
<p>License types e.g. licenses for part timers or peak periods</p>	<p>License types around part timers or peak periods does not make sense for ridesharing driver partners.</p> <p>Ridesharing is an ad hoc commercial pursuit with uberX driver partners offering a shared ride on a schedule of their choosing. While there are full-time uberX driver partners on the Uber platform, most Uber driver partners drive on the Uber platform for less than 10 hours a week. In many ways, Uber for these driver partners is not a full-time or part-time opportunity, but an opportunity to earn a few extra thousands of dollars a year to pay for a family vacation, save for a mortgage down payment, retirement, etc.</p> <p>The attraction of the ridesharing proposition is to build it around personal and family schedules, be it 5 a.m., 5 p.m., or 10:37 p.m. It means driving for 3 hours one week, none the next two weeks, and driving again the following week for 6.3 hours. It also means driving full-time in the event of a sudden job loss. The flexibility rests totally with Uber driver partners.</p>
<p>Required training</p>	<p>Uber uses GPS technology in app for routing trips. Passengers can determine their location and destination by using GPS and/or entering information such as an address or location name (i.e.</p>

	<p>hotel name, restaurant name, etc.).</p> <p>Uber facilitates learning and training on using the app and customer service, among other items.</p> <p>With the Uber app, riders and driver-partners are asked to rate each other and provide feedback for every trip before requesting or accepting another ride. This feedback is monitored and responded to by Uber 24-hours a day.</p> <p>The fact that Uber driver partners know they are being rated on each trip, in addition to the feedback provided after trips by riders, enables Uber driver partners to constantly improve customer service.</p> <p>As Ottawa’s Policy Options paper notes, “Customer service concerns have been raised by users of the traditional taxi service, while customer service provided by Uber drivers has been reported as generally being very good. This raises a question as the effectiveness of the course relative to other mechanisms, such as driver rating”.</p> <p>Research firm Core Strategies who conducted the focus groups in September 2015 for the City of Ottawa’s taxi bylaw review, reported that Uber scored higher than taxi for car cleanliness, comfort and driver courtesy. Uber driver partners were found to be more caring, professional, and engaged than taxi drivers.</p>
<p>Complaint resolution processes</p>	<p>With the Uber app, riders and driver-partners are asked to rate each other and provide feedback for every trip before requesting or accepting another ride. This feedback is monitored and responded to by Uber 24-hours a day in order to address consumer complaints or other issues.</p> <p>In addition:</p> <p>24/7 support If riders or driver-partners have any questions about their trip, or if they need to report an incident, Uber’s customer support team is ready to respond to any issues.</p> <p>Rapid response Uber has a dedicated Incident Response Team to answer any urgent issues. If we receive a report that there has been an accident or incident, we can suspend the relevant parties and</p>

	<p>prevent them from accessing the platform until the matter is resolved.</p>
<p>Licence fees charged to licence holders</p>	<p>A flat annual fee imposed on the Transportation Network Company (Uber) rather than per driver and/or vehicle fees ensure a City recoups regulatory compliance costs while not creating an unnecessary obstacle to local citizens looking to rideshare as a means to supplement income.</p> <p>The Edmonton ridesharing by-law licenses the Transportation Network Company (Uber) and fees are imposed on Uber rather than the individual driver partner looking to take advantage of a flexible earning opportunity via the sharing economy.</p> <p>The key change with ridesharing regulations is the move from dual-licensing (with companies and drivers both needing a license) to a unified regime where only companies are licensed and where anyone can become a driver so long as they meet/pass the standard criteria (background checks, etc.).</p> <p>Separate requirements on drivers deter people who only want to drive for a few hours each week and will benefit from this kind of flexible work.</p>
<p>Enforcement</p>	<p>With respect to street enforcement by bylaw officers, enforcement officers can be provided with dedicated rider accounts that could be used to order Uber rides for compliance purposes. Uber Driver partners would not know who is ordering a ride when they receive a request.</p> <p>Under the ridesharing model, the Transportation Network Company (Uber), restricts access to the platform by driver partners. Only those authorized to drive by Uber, have access to the driver partner app to receive ride requests. The City audits the practices to ensure compliance in this regard.</p>