

## **Transportation Network Company Regulation Questionnaire**

The City of Corpus Christi is currently evaluating the attached ordinance for passage. In an effort to create a regulatory scheme that provides safe transportation for the public that is not unduly burdensome on the transportation industry, the City is seeking your input in the form of the attached questionnaire. The attached form and any response will be provided to City Council and will be a matter of Public Record.

Responses submitted by: Chris Miller  
on behalf of

Transportation Network Company: Uber Technologies \_\_\_\_\_

### **Company Regulations**

**1.** Sec. 57-285 proposes Transportation Network Company (TNC) permit be issued for the term of 1 year.

*Does your company oppose or have an alternative recommended term?*

Response: We support an operating permit for TNCs.

**2.** Sec. 57-284 proposes a TNC permit fee of 2% of annual gross receipts for the operation of each transportation network vehicle operated by each permittee.

*Does your company oppose or have an alternative recommended fee?*

Response: Oppose. We support a flat fee structure, similar to what we've seen adopted in most Texas cities.

**3.** Sec. 57-295 proposes a requirement that TNC vehicles have trade signage or emblem readable at a distance of at least 50 feet.

*Does your company oppose or have an alternative recommended trade signage regulation?*

Response: Oppose. This is actually a safety concern for us because people who are not on the Uber platform could use this easily attainable signage to persuade people to get in the car with them. The only way to know who is an authorized driver on the Uber platform is through the app, which cannot be replicated.

**4.** Sec. 57-284 proposes that TNC records necessary to determine gross receipts are inspectable by Taxi inspector upon 10 days notice.

*Does your company oppose or have an alternative recommended record inspection requirement?*

Response: Oppose. This is inconsistent with TNC regulations we've seen across the state and country.

## **Driver Regulation**

**5.** Sec. 57-291 proposes TNC driver's hours of operation is limited to 12 hours in any consecutive 24 hour period.

*Does your company oppose or have an alternative recommended operating hours for drivers?*

Response: Oppose.

**6.** Sec. 57-290 proposes that TNC drivers are required to have a vehicle for hire driver's permit.

*Does your company oppose or have alternative recommended driver permit requirement?*

Response: Oppose. Thirty states and many cities have laid out regulations that clearly regulate TNCs without creating any redundant permitting requirements or artificial barriers to entry for individual driver-partners.

**7.** Current City Ordinance Sec.57-96 establishes a \$50 permit fee for vehicle for hire driver's permit.

*Does your company oppose or have an alternative recommended driver permit fee?*

Response: Oppose. We would propose a flat fee for a company operating permit as is done in most Texas cities.

**8.** Current City Ordinance Sec. 57-97 requires vehicle for hire driver permit applicants to submit a medical report certifying applicant is physically fit to operate a vehicle.

*Does your company oppose or have an alternative recommended physical fitness certification for driver permits?*

Response: Oppose. This is inconsistent with ridesharing regulations in most other cities and states.

**9.** Current City Ordinance Sec. 57-97 requires vehicle for hire driver permit applicants to submit to a fingerprint background check.

*Does your company oppose or have an alternative recommended background check requirement for driver permits?*

Response: Oppose. We would propose that all drivers must complete a national in scope background check performed by a nationally accredited third party background check provider,

which is consistent with ridesharing regulations in thirty states that cover a population of 200 million Americans.

### **Vehicle Regulation**

**10.** Sec.57-294 proposes that TNC vehicles to be inspected annually by the City.  
*Does your company oppose or have an alternative recommended vehicle inspection?*

Response: Oppose. Each driver's vehicle must already undergo an annual state inspection, which is required to drive on the Uber platform.

**11.** Sec. 57-293 proposes TNC vehicles have an age limitation not to exceed 7 years in age. The 7 years can be extended 3 years with additional vehicle inspection.  
*Does your company oppose or have an alternative recommended vehicle age limitation?*

Response: Oppose. We propose that this should be left up to the TNC, as is the case in many states and cities.

### **Airport Regulations**

City Staff is currently drafting specific TNC regulations for the Airport.

**12.** Sec. 57-296 proposes that TNC drivers operating at Corpus Christi International Airport comply with Airport regulations.  
*Does your company oppose or have an alternative recommendation for requiring compliance with additional TNC Airport regulations?*

Response: We would prefer to discuss appropriate pickup and dropoff details directly with the airport.

**13.** Current City Ordinance, Chapter 9 does not specifically address TNC usage. Current City Ordinance establishes a trip fee of \$50 monthly or \$2 per arrival for taxicabs.

*Would your company oppose or have alternative recommendations for additional fees for TNC vehicles at the Airport?*

Response: Oppose. We support allowing consumers and airport travelers to have more transportation options. We propose a \$1 per pickup fee for every trip originating from the airport.

### **Additional Feedback**

Please provide any additional feedback or comments:

We are hopeful that the City of Corpus Christi will adopt modern ridesharing regulations similar to those recently adopted by other Texas cities (e.g., Beaumont, College Station, Bryan, Abilene, San Marcos) and already in place in thirty states.