



August 16, 2016

The Honorable Liane Randolph  
Commissioner  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

RE: Mandated Fingerprinting for Transportation Network Company Drivers

Dear Commissioner Randolph:

The San Francisco Chamber of Commerce is pleased to respond to your Assigned Commissioner's Ruling (ACR) of June 22, 2016 requesting comments regarding mandated fingerprinting of prospective drivers of Transportation Network Companies (TNCs).

The San Francisco Chamber of Commerce partners with more than 2,500 member business organizations and their 200,000 employees to support local business, promote commerce and cultivate a dynamic economy. We believe these proposed requirements would unnecessarily burden drivers, deterring potential new drivers and stifling the continued growth of ridesharing, while adding little enhanced safety.

TNCs are creating innovations to make much more efficient use of our automobile fleet by allowing drivers to share their rides with others. Developing a broader array of convenient, affordable transportation options offers us the opportunity to reduce traffic congestion and build more sustainable communities where people have a viable alternative to car ownership. This ultimately offers California a significant opportunity to address some of our most intractable environmental challenges with innovative new strategies.

The convenience and reliability of ridesharing models depends heavily on broad acceptance and use, which in turn requires both public confidence in the safety of ridesharing and ease of use for consumers and drivers alike. We believe that TNCs and the Commission have struck a successful balance, as demonstrated by enthusiastic public acceptance of ridesharing and its rapid growth.

TNCs already conduct in-person screenings and strict background checks, using companies that are already highly regulated by the state and federal governments. TNCs have incorporated additional features such as GPS monitoring, two-way rating systems that permit riders and drivers to rate their experience and the use of cashless payments that enhance safety for riders and drivers alike.

Many TNC drivers work part time. The imposition of new fingerprinting requirements will only increase costs and shrink the number of prospective drivers. The San Francisco Chamber of Commerce shares the concerns of many other stakeholders that the costs and inconvenience of fingerprinting could weigh especially heavily on drivers from disadvantaged communities. Databases used by the fingerprint system are often incomplete and do not consistently record final arrest dispositions so reliance on fingerprint-based systems could prevent many prospective drivers who are qualified to drive from doing so. The burden of correcting inaccurate arrest records falls solely on the applicant and can be a costly and time consuming process, unnecessarily depriving the applicant of his or her right to earn income. This could disproportionately affect disadvantaged communities most in need of the transportation options and economic opportunities provided by TNCs.

For these reasons, the San Francisco Chamber of Commerce urges the Commission to reject these proposals for mandated fingerprinting.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Lazarus", with a long horizontal flourish extending to the right.

Jim Lazarus  
Senior Vice President, Public Policy