

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 6, 2015

Krishna Juvvadi, Senior Counsel  
Rasier-CA LLC.  
1455 Market St., 4<sup>th</sup> Floor  
San Francisco, CA 94103

Dear Mr. Juvvadi:

On December 24, 2014, Rasier-CA LLC ("Rasier") requested clarification from SED regarding the vehicle inspection requirements for Transportation Network Companies (TNCs) adopted by the Commission in Decision (D.) 13-09-045. Specifically, Rasier asked SED whether it was permitted to stop using licensed mechanics to conduct vehicle inspections and instead rely on a "peer mentor" similar to the practice currently used by the TNC Lyft.

Ordering Paragraph (OP) 5 of D.13-09-045 states:

"We require the Transportation Network Company (TNC) or an authorized third party facility licensed by the California Bureau of Automotive Repair to conduct and ensure that each vehicle passes a 19-point vehicle inspection prior to allowing a vehicle to be driven as part of the TNC's service, and annually thereafter, and for the TNC to maintain the record of such inspections in case of an audit."

Based on a plain reading of OP5, the Commission does not expressly require TNCs to have a licensed facility conduct and ensure vehicles pass the 19-point inspection prior to entering TNC service. SED did not locate a requirement regarding a TNC's specific qualifications to conduct the required inspection.

However, relying on a licensed facility to conduct the required vehicle inspection is safer than relying on an individual without the experience or training to conduct such an inspection. As such, SED encourages Rasier to maintain its current safety-practice of relying on licensed facilities to conduct its vehicle inspections.

Thank you for notifying SED of a potential change to Rasier's inspection mode. If Rasier decides to change its inspection program, please provide SED with an updated program and inspection procedures.

Sincerely,

*Denise Tyrrell by VB*

Denise Tyrrell  
Acting Director, Safety and Enforcement Division