



June 6, 2016

Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

RE. REPORT OF LYFT, INC. REGARDING UNACCOMPANIED MINORS

In response to *Assigned Commissioner's Ruling Ordering the Submittal of Plans from Transportation Network Companies that Do Not Primarily Transport Unaccompanied Minors* of May 23rd, 2016 (the "Order"), Lyft, Inc. ("Lyft") submits the following report regarding its plans and current practices to prevent the use of its platform by unaccompanied minors.

As Lyft explained in its comments during Phase II, it is Lyft's policy that unaccompanied minors are not permitted to access or use the platform. Lyft users are required to be at least 18 years of age, and it is Lyft's stated policy that unaccompanied minors are not permitted to take Lyft rides on their own. This report sets forth the measures that Lyft currently takes to ensure that unaccompanied minors do not use the platform, as well as Lyft's plans to enhance these measures.

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1. HOW EACH TNC WILL PROMINENTLY NOTIFY ITS APP SUBSCRIBERS THAT THE TRANSPORTATION OF UNACCOMPANIED MINORS IS PROHIBITED

Prior to being able to access or utilize the Lyft application (the “app”), Lyft requires that every user (passengers and drivers) certify that he or she is over the age of 18, through the following process:

Each user that creates an account with Lyft is required to consent to our Terms of Service (“Terms”). The second section of Lyft’s Terms establish the eligibility criteria for use of the app, including age:

2. Eligibility

The Lyft Platform is available only to, and may only be used by individuals who can form legally binding contracts under applicable law. Without limiting the foregoing, the Lyft Platform is not available to children (persons under the age of 18) or Users who have had their User account temporarily or permanently deactivated. By becoming a User, you represent and warrant that you are at least 18 years old and that you have the right, authority and capacity to enter into and abide by the terms and conditions of this Agreement.



As part of the sign-up process, all users must consent to these Terms, and represent and warrant that they are over 18 years old. Accordingly, as a threshold measure, no person can access the Lyft app without certifying that they meet this age requirement.

In addition to this conspicuous requirement in the Terms, Lyft also notifies users of the age requirement on its “Safety Policies” webpage of the online help center. This language can be seen here: <https://help.lyft.com/hc/en-us/articles/213584258-Safety-Policies>

Finally, every landing page for our California cities (e.g. <https://www.lyft.com/cities/los-angeles>) will remind passengers and drivers that unaccompanied minors are not permitted to use the Lyft platform with the following language:

In California, unaccompanied minors are prohibited from traveling with most carriers, including TNCs. In California, a passenger must be 18 to sign up for Lyft account, but if a driver believes a passenger might be underage, the driver may ask the passenger to confirm their age. The driver may also let a passenger know that the driver will have to cancel the trip if the passenger is indeed under 18. In addition, drivers can report requests to transport unaccompanied minors by contacting Lyft support.

This is the primary landing page where users look for local information about rates, coverage areas, and airports, and therefore we believe is an effective way to reinforce this message.

The minimum age requirement is clearly presented in the app itself, the signup process, and on the website. We believe these notifications are more than sufficient to

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notify app subscribers that unaccompanied minors are not permitted to access the Lyft platform.

2. HOW EACH TNC WILL PROMINENTLY NOTIFY ITS TNC DRIVERS THAT THE TRANSPORTATION OF UNACCOMPANIED MINORS IS PROHIBITED, AND WHAT ACTIONS A TNC DRIVER SHOULD TAKE IF A RIDE IS REQUESTED FOR AN UNACCOMPANIED MINOR.

By communicating the age requirement up-front and on a recurring basis, as well as on multiple online driver resources, we are confident that drivers will be well aware of their obligation not to transport unaccompanied minors.

Lyft communicates its safety standards – including the prohibition on transporting unaccompanied minors – on Lyft’s website as well as on various driver training materials.¹

For example, the Lyft online help center provides this guidance for drivers:

Don’t pick up minors unaccompanied by an adult

Passengers are more than welcome to request rides for their friends, though we do ask that they give you a heads up. Children 17 or under, however, are not permitted to ride without being accompanied by an adult.

¹ <https://help.lyft.com/hc/en-us/articles/214218427-Ensuring-Passenger-Safety-as-a-Driver> , and <https://help.lyft.com/hc/en-us/articles/213584258-Safety-Policies>

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Age Requirement

In California, unaccompanied minors are prohibited from traveling with most carriers, including TNCs. In California, a passenger must be 18 to sign up for Lyft account, but if a driver believes a passenger might be underage, the driver may ask the passenger to confirm their age. The driver may also let a passenger know that the driver will have to cancel the trip if the passenger is indeed under 18. In addition, drivers can report requests to transport unaccompanied minors by [contacting Lyft support](#).

In addition to the website and the Terms, Lyft plans to reinforce this age requirement by ensuring that it is communicated both at the onboarding stage and at regular intervals once drivers are on the road. To this end, we plan to include within our new driver onboarding information to applicants that they are not permitted to transport unaccompanied minors. This message will then be reinforced with reminders to the drivers, sent at least on a quarterly basis. One such driver-focused communication is the “driver digest” email newsletter, which provides drivers with tips and updates, as well as key information about local rules and requirements. Another channel for reinforcing this message is the driver help center.

If a driver suspects that a ride is being requested for an unaccompanied minor, the driver should alert Lyft’s support team immediately, and Lyft will reach out to the user to

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alert them this activity is prohibited. As shown above, these instructions are included on Lyft's website.

3. HOW EACH TNC WILL TRACK AND VERIFY THAT UNACCOMPANIED MINORS ARE NOT BEING TRANSPORTED BY A TNC DRIVER

Lyft has a number of measures in place to track and verify that unaccompanied minors are not being transported by a TNC driver:

- Passengers signing up to use the Lyft app must follow the same process outlined above in response to Question 1. Therefore, each user that requests a ride through the application has already verified that he or she is over 18, and will have been informed through the Terms that the transportation of unaccompanied minors is strictly prohibited.
- Lyft also has measures in place to prevent unaccompanied minors from being transported by a TNC driver. The app provides drivers with the first name and image provided by the person associated with the account. Lyft instructs drivers to



ask riders “what’s your name?” when they arrive at the pickup location, and to ensure it matches the name provided in the app.² This serves the dual purpose of ensuring that the right passenger gets in the right vehicle, and also helps to verify that the passenger has consented to the Terms.

- Lyft also has a robust complaint management and tracking system, which enables it to track complaints by driver, and type of complaint. These complaints can easily be submitted directly through the app, by phone, or by email.

We believe these measures are more than sufficient to track and verify that unaccompanied minors are not accessing the platform.

4. HOW EACH TNC WILL ENFORCE THE PROHIBITION AGAINST TRANSPORTING UNACCOMPANIED MINORS

Currently, Lyft treats reported violations of the age requirement in the same manner as other violations of the Terms – in which drivers and passengers can be deactivated depending on severity and other aspects of the reported offense. As explained in more detail below, if Lyft receives multiple complaints that this type of prohibited activity is occurring, the driver or passenger account will be deactivated.

² <https://help.lyft.com/hc/en-us/articles/214219587-Picking-up-the-Wrong-Passenger> .



5. WHAT ACTIONS EACH TNC WILL IMPOSE ON THE TNC APP SUBSCRIBER THAT REQUESTS THAT A TNC DRIVER TRANSPORT AN UNACCOMPANIED MINOR

If Lyft receives complaints that the user is a minor, a Lyft employee will contact the user to verify their age. In the event that the user is under the age of 18, the account will be immediately deactivated, as it is a violation of our Terms for an account holder to be under 18 years of age.

If, instead, Lyft receives a complaint that a user is requesting rides on behalf of unaccompanied minors, Lyft will reach out to the user to alert the user that requesting a Lyft on behalf of unaccompanied minors is prohibited, and a violation of Lyft's Terms. If Lyft receives multiple complaints that this type of prohibited activity is occurring, the passenger's account will be deactivated.

6. WHAT ACTIONS EACH TNC WILL IMPOSE ON THE TNC DRIVER THAT TRANSPORTS AN UNACCOMPANIED MINOR

If Lyft receives a complaint of a driver transporting unaccompanied minors, Lyft will reach out to the driver to provide additional training and reminders that this type of activity

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is prohibited. If Lyft receives multiple complaints that this type of prohibited activity is occurring, the driver's account will be deactivated.

- 7. IF A TNC IS PLANNING TO EXPAND ITS SERVICES TO INCLUDE THE TRANSPORT OF UNACCOMPANIED MINORS, INCLUDING WHERE SUCH SERVICES IS ONE OF A RANGE OF SERVICES OFFERED BY THE TNC, ITS PLAN FOR MEETING THE REQUIREMENTS OF D.16-04-041 AND D.97-07-063 AND REQUESTING COMMISSION APPROVAL OF ITS LICENSE TO PERFORM SUCH OPERATIONS BEFORE INITIATING THE SERVICE.**

Lyft currently has no plans to expand its services to include the transport of unaccompanied minors in California.

Dated: June 6, 2016

LYFT, INC.

By: 

Andrea Ambrose Lobato
Director, Regulatory Compliance

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