IMPLEMENTATION PLAN

of

RASIER-PA, LLC

in response to

PENNSYLVANIA PUBLIC UTILITY COMMISSION BACKGROUND CHECK REVIEW

Docket No. D-2018-3003143

February 22, 2019

INTRODUCTION

All public utilities within the Commonwealth of Pennsylvania, including transportation network companies (TNCs), are subject to the Pennsylvania Public Utility Commission's (PUC or Commission) general administrative power and authority to supervise and regulate under 66 Pa.C.S. § 501(b). Specifically, the Commission can investigate and examine the condition and management of any public utility under 66 Pa.C.S. § 331(a). Furthermore, Act 164 of 2016 (Act of Nov. 4, 2016, P.L. 1222, No. 164) established Chapter 26 of the Public Utility Code which clarified the Commission's role in regulating transportation network companies and outlined the regulatory framework for TNCs. These laws apply to all TNC operations within Pennsylvania except for cities of the first class (i.e., Philadelphia) where, pursuant to 66 Pa.C.S. § 2603(a), the City of Philadelphia regulates TNCs.

In May 2018, the PUC Commissioners directed the Bureau of Audits (Audit Staff or Staff) to conduct a review of Rasier-PA, LLC's driver background check process within Pennsylvania (the Review). Rasier-PA is a technology company that has a license to use the Uber smartphone application, which includes a driver application and a rider application (Uber App). Rasier-PA is a wholly-owned, indirect subsidiary of Uber Technologies, Inc. Rasier-PA, LLC holds a TNC license in Pennsylvania under license number 1035574-TNC. To aid the Commission, this document shall refer to Rasier-PA as Uber (the TNC's trade name) or the Company.

The background check review's objectives were: (1) to determine compliance with all applicable provisions within Chapter 26 of 66 Pa C.S. and Chapter 29 of 52 Pa Code pertaining to the Company's driver requirements and background check process; (2) to identify opportunities for process improvement and develop recommendations to address those opportunities; and (3) to provide the Commission, the Company, and the public an assessment of the company's driver background check process.

The scope of the Review was limited to these objectives and further refined, in a collaborative effort between the Audit Staff and the Company, to include a review of safety-related data, processes, and initiatives.

The Audit Staff concluded its Review by issuance of a report summarizing its work and outlining its conclusions (the Report). By letter dated February 13, 2019, the Audit Staff requested of Uber an Implementation Plan in connection with recommendations contained in the Report.

Uber is pleased to submit this Implementation Plan, wherein the Company accepts in whole or in part each of the Audit Staff's seven recommendations. Uber would like to thank the Staff and the Commission for the cooperation extended to Company personnel during the Review.

RECOMMENDATION 1	Strengthen the background check process and continuous monitoring features.
RASIER-PA RESPONSE	Company partially accepts recommendation.

DISCUSSION

Uber remains committed to using the most cost-effective products to maintain safety on its rides platform. As discussed with the Staff during the final stages of this Review, Checkr recently enhanced its continuous monitoring feature—as part of its ongoing effort to provide the highest level of service. Many such improvements occurred from the time the Staff began its Review to the time of the Review's completion. Subject matter experts, Kirsten Miller (Sr. Central Operation & Compliance Manager) and Megan Poonolly (Senior Counsel, Safety) will lead the Company's efforts to assess whether Checkr's enhancements fully implement the Staff's continuous monitoring recommendations. The assessment will occur within the first half of 2019, as part of the frequent (no less than weekly) engagements with Checkr counterparts—as discussed with the Staff during this Review. During such time and engagement, the Company also will work towards improving Pennsylvania's monitoring efforts by working to integrate Checkr's enhancements into service level agreements.

Uber accepts the Staff's recommendation to further engage Pennsylvania lawmakers and regulators in an effort to further educate one another and build strong working relationships. Jason Burch (Regulatory Counsel - Northeast US) and Kevin Kerr (Pennsylvania Policy Lead) will lead these efforts in the first half of 2019 (and beyond). Already Messrs. Burch and Kerr have scheduled meetings with Pennsylvania consultants and regulators to discuss TNC platform safety. Uber counts the Staff's Review as productive work toward furthering partnerships with the Commission in addressing safety for all Pennsylvanians using the Uber App.

Uber reiterates its concerns, discussed during the Review, regarding the Staff's recommendation to add fingerprinting to the continuous monitoring process, which the Company does not accept. Further, Uber respectfully disagrees with the statement that fingerprinting "would greatly reduce the possibility of false positives/negatives and provide a clearer picture of the counties that should be searched."

The shortcomings of fingerprint background check systems are well-documented. As discussed with the Staff, no single, comprehensive database of criminal history information is available in the United States today. The FBI Interstate Identification Index, the database through which law enforcement agencies run fingerprints to identify criminal history, contains only the information

submitted by each jurisdiction. In many instances, the reported information is incomplete or inaccurate. This fact is what motivates Checkr to conduct a much more comprehensive search of records as part of its background check process, including a review of records at the source, going to the county courthouse in person if necessary.

Indeed, fingerprinting introduces a large margin for error. A fingerprint search can return up to 20 possible matches, and the final determination of a match is made by a human technician. If an individual was not fingerprinted during an arrest by law enforcement, the FBI will not take note of the arrest and subsequent disposition (e.g. conviction or dismissal), for database purposes. In Pennsylvania, for example, more than a dozen counties are without fingerprints in at least 20 percent of cases. Note also that not every person has readable fingerprints. This can be caused by loss of skin elasticity for aging individuals; or repetitive work activities such as bricklaying or even filing papers, which can wear down fingerprint ridges over time. Over 25% of people with skin issues have trouble producing scannable fingerprints. People who cannot do a fingerprint check will undergo a name-based check, using their name, date of birth, and SSN—a presumably fail-safe approach that uses the same information required by Checkr and the Company's standard process.

Moreover, fingerprint-based checks can be discriminatory with little opportunity for rehabilitation. Because fingerprint results have a lifetime lookback period, as opposed to a seven year lookback period under the Fair Credit Reporting Act and most statutes governing TNC operations throughout the US, individuals may lose out opportunities for crimes committed long ago. Yet work opportunity is critical to reducing recidivism and keeping formerly incarcerated individuals from going back to prison. And in any case, the FBI advises at least 12-14 weeks request processing. Partnering with Uber is a flexible opportunity that is well-suited for many people who may not have special skills. Increasing its barriers to entry alienates many of the people who need such an opportunity. Taking an annual quarter to get through one step of the process is unnecessarily onerous and can mean all the difference.

Uber is grateful to the Staff for its genuine interest in learning more about the ways in which the Company's and Checkr's processes aim to correct for these gaps and yield are more robust background check of potential driver-partners.

CLARIFICATION

Related to the Staff's recommendation, the Company would like to clarify that database checks related to fingerprints occur at that state rather than county level, including for example, state

Bureaus of Investigation or state Departments of Justice. This system is therefore dependent on counties within each state sending updated records to the databases, which, as discussed with the Staff during this Review, does not occur in a consistent way.

RECOMMENDATION 2	Redesign the Safety Toolkit icon allowing for quicker and easier identification.
RASIER-PA RESPONSE	Company partially accepts recommendation.

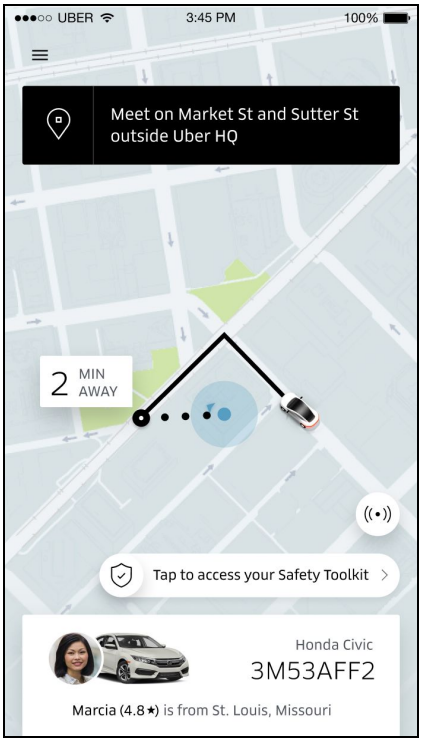
DISCUSSION

The Audit Staff recommends that Uber redesign the Safety Toolkit icon in the Uber App to facilitate quicker identification of safety features in the event that a rider or driver requires urgent assistance. The Report states that the icon is "inconspicuous" and questions whether riders and drivers will be able to effectively deploy the Safety Toolkit during an emergency. The Report cites a scholarly article from The British Psychological Society to support its claim that "during emergency situations individuals may experience impaired cognitive functioning and take ineffective actions."

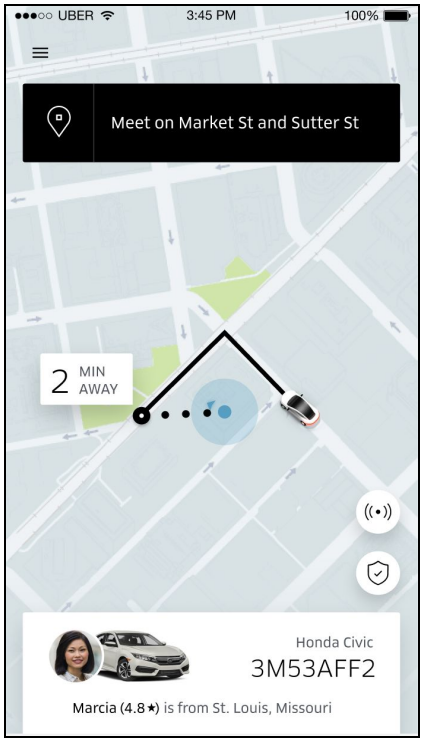
Uber accepts the Staff's recommendation to review and refine the Safety Toolkit. Uber's Product Safety and Product Design teams, represented by Calvin Pappas (Sr. Product Manager), will continue to review product information about usage, awareness, and utility of the Safety Toolkit. Work toward the next generation of the product will take under advisement the Staff's helpful recommendations. Such advice will assist Mr. Pappas in providing an even more accessible experience within the product, with streamlined safety branding, by the end of 2019.

The Company discussed product experience matters with Staff during the early portions of the Review. Many technical matters germane to user interface and user experience design were beyond the scope of the review. Yet subject matter experts and regulatory counsel explained that Uber conducted extensive user research to determine both the design and placement of the Safety Toolkit icon. The Company notes here that during the research phase, the Safety Toolkit icon was blue. Through feedback from driver-partners, however, the Company learned users often misinterpreted the color—believing that a feature was activated when in fact it was not. That potential distraction was to be avoided. And it carried a risk that users would lose trust in the safety features all together. Moreover, driver-partners did not gravitate any more toward the blue button than the current black and white button. Note also during the development of the Safety Toolkit icon, Uber considered adding an "On" state, where the icon would turn a particular color if it was activated as a panic feature. In such case, if the Company had launched with a blue icon soon thereafter, there would be significant challenges in retraining driver-partners to understand the difference between an activated and deactivated icon.

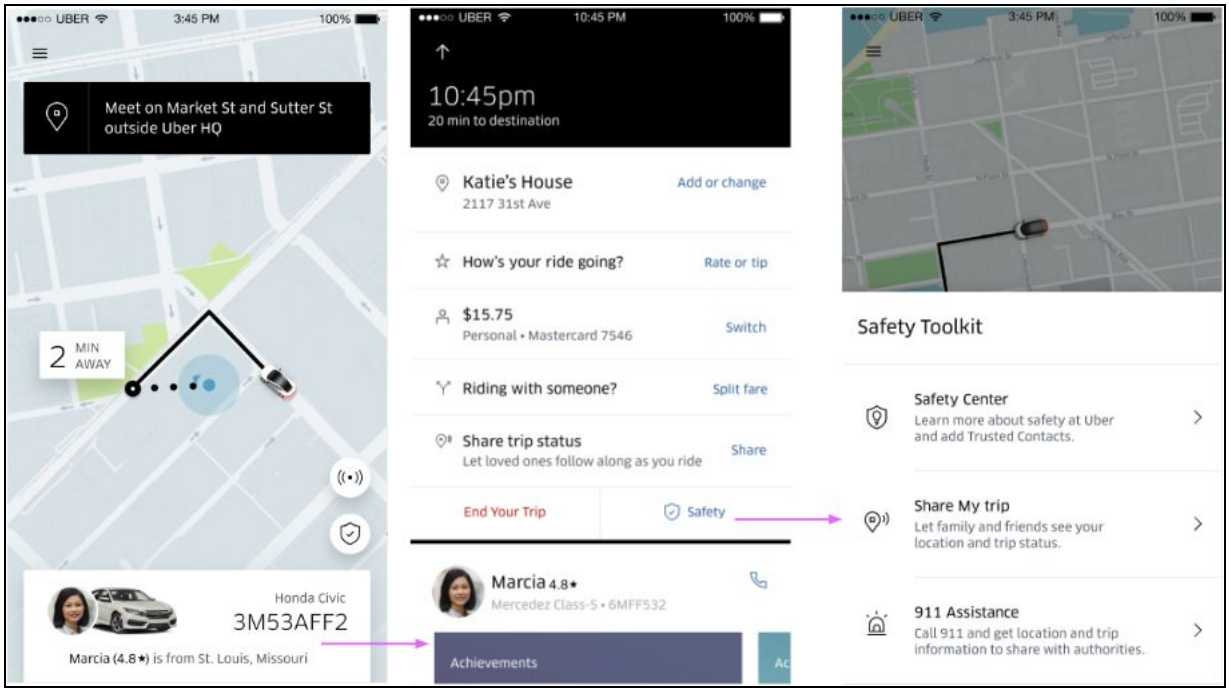
With respect to placement in the rider app, Uber's research demonstrated that the icon should be integrated into the map. That placement would avoid detracting from key elements used during the majority of trips. To help ensure riders are aware of the Safety Toolkit and understand its functionality, the Uber App highlights the feature if a rider has not previously visited the Safety Toolkit. Riders also may access the tool through the on-ride menu, which features critical information that riders use on each trip. This includes, for example, requested destination; trip fare; payment information; and the cancel trip option. See examples from the rider app below.



Rider initial interaction with Safety Toolkit

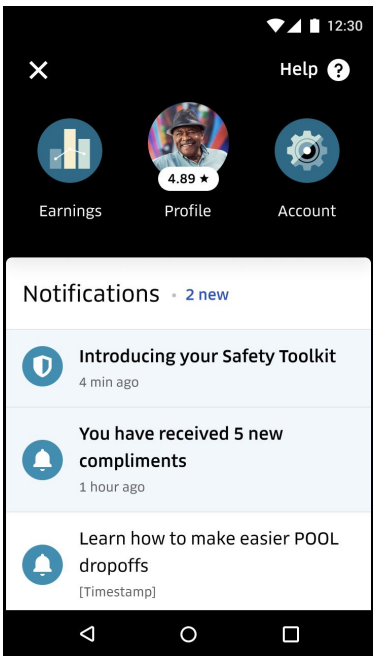


Rider recurring Safety Toolkit entry point

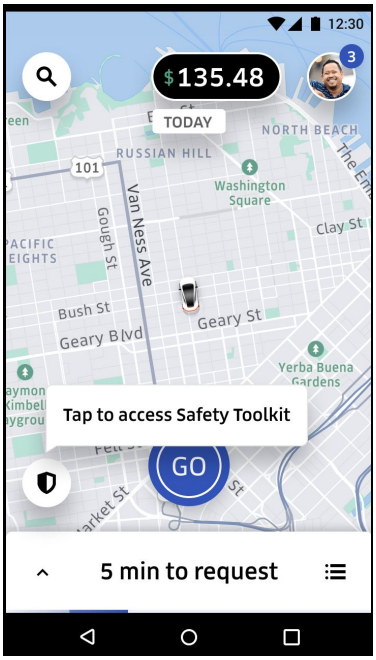


Safety Toolkit access through rider app's on-ride menu.

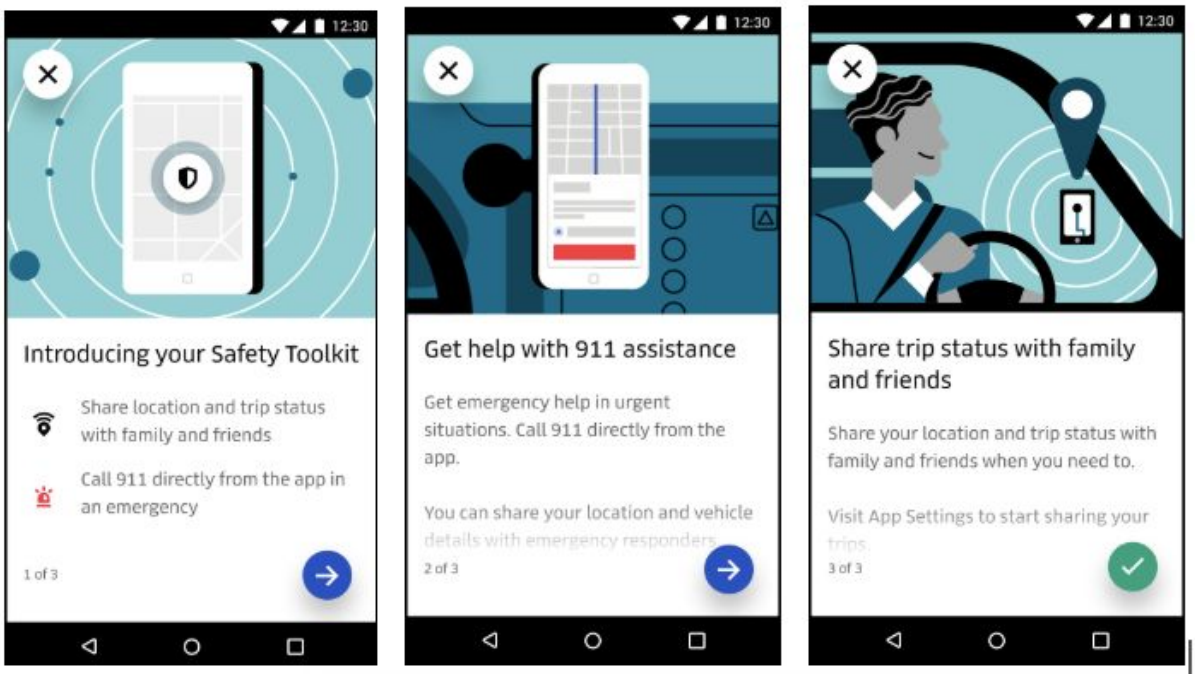
For drivers, the Uber App highlights the Safety Toolkit icon and includes a demonstration of the Toolkit's functionality upon initial engagement.



Driver notification regarding Safety Toolkit



Driver initial interaction with Safety Toolkit



Driver App Safety Toolkit Demonstration

A number of other considerations inform the appearance of the Safety Toolkit icon. The driver app user experience is more complex, including navigation features. So it is crucial that the appearance of the icon and placement does not distract from driver's safety on the road. Moreover, Uber follows several general principles of user experience design to distinguish the Safety Toolkit icon from other, higher usage app features. For example, navigational functions live on the bottom right of the driver app's map, while safety functions are on the bottom left. Uber's product design teams find this to be a meaningful cognitive grouping that aids memory and recall—especially in an urgent time of need.

RECOMMENDATION 3	Explore ways to reduce the level of insufficient information in the complaint investigation process.
RASIER-PA RESPONSE	Company accepts recommendation.

DISCUSSION

Uber commends the Audit Staff for its detailed work in understanding the complaint investigation process. The constructive, two-way discussions allowed the Company to explain one of the most important concepts in the still growing ridesharing industry. As a result, the Company accepts the Audit Staff's recommendation to explore ways to reduce the level of insufficient information in the complaint investigation process.

In particular, Uber will continue explore ways to refine its safety taxonomy, potentially through more specific and defined categories. This likely will allow the Company to better obtain and evaluate investigation information. Throughout 2019, Greg Brown (Program Leader, Critical Customer Support) and Todd Gaddis (Manager, Data Analytic) will continue to work with Jason Burch (Regulatory Counsel) and Daniel Kolta (Safety Counsel) in order to assess new technological products that will help yield more and better event data. Indeed, this work has been ongoing since the time the Staff began its Review. It will continue during 2019 and beyond.

The Company commits to exploring the use of dashcams for rides originating in Pennsylvania. Even though such technology remains in a pilot phase, the Company believes that recording trips with dashcams has the potential to unlock step-function improvements in incident prevention and response. Consumer research finds that drivers often hope dashcams can serve as a type of insurance, to protect users and collect evidence in case of car accidents, poor rider behavior, fraudulent claims, sexual harassment, or noticeably underage riders.[1]. Yet, as discussed with the Staff, the actual safety benefits of dashcams are not yet proven. Any effort to prove that dashcams can actually prevent safety incidents or reduce insurance costs would require a large-scale pilot in a controlled fashion. In 2019, the Company will explore whether dashcams can yield meaningful safety benefits through rigorous experimentation. Mr. Kolta will advise and work closely with Product Operations teams in this effort. Many of the ideas that the Staff assumed to be true, such as whether dashcams reduce interpersonal conflict rate through deterrence, could be tested and evaluated in the second half of 2019.

[1] For additional information on how dashcams are used today, see this entry from a noted industry observer: The Rideshare Guy's 4 Reasons Why Drivers Need a Dashcam, *available at* https://therideshareguy.com/4-reasons-why-drivers-need-a-dash-cam/

CLARIFICATIONS

The Company would like to offer clarifications on matters that remain imprecise in the Report.

- The Company's Urgent Support unit as described in the Report does not handle impaired driving. A specialized unit within the Incident Response Team reviews such matters in a separate, specialized workflow.

- Regarding user deactivations, dynamic thresholds are either universal or customized on a per-city basis. Thresholds can also include sensitivity for a given user's rating. Yet users' star ratings are in addition to, not a replacement for, other policies that could lead to deactivation for continued policy violations.

- The Report's general reference to "sufficient" vs. "insufficient" information, and "valid" vs. "not valid" allegations—in the complaint investigation context—is imprecise. The Company expresses no disagreement with the Staff's characterization of the investigation process, which inherently operates in a world of incomplete information. The Staff's descriptions, however, based as they are on subject matter experts' attempts to provide layperson answers, do not represent terms of art. In the above Discussion, the Company provides implementation plans that should yield more substantiated information in the complaint investigation process. On that key point, Uber thanks the Staff for its detailed review and recommendations.

- Regarding user deactivations, the Report states that a lifetime threshold "results in deactivation after three valid complaints." This is not true in all cases, however. For instances of alleged sexually explicit comments, a user will lose access to the Uber App after two complaints with sufficient information. Lifetime thresholds are designed to limit the number of policy violations for a specific issue, regardless of how long a driver-partner or rider has used the Uber App. The lifetime threshold of issues such as wrong rider complaints, cash exchanges, and destination discrimination may have a higher lifetime threshold. For complaints that are more serious in nature, however, the lifetime threshold may be lower.

- The Report indicates that enforcement of a minimum star rating is how Uber addresses non-safety issues on the platform. Yet star ratings are merely one tool to ensure that both riders and driver-partners are adhering to Uber's policies, including the Community Guidelines. The Review focused on safety-related complaints, thus the Audit Staff did not access the full realm of non-safety related decision making. For example,

driver-partners may also lose access to the Uber App for high cancellation rate, instances of fraud, and other similar infractions.

- Regarding complaints described as "less serious safety allegations," the Report notes that "minor verbal altercations and dangerous dangerous driving (e.g., speeding, harsh braking)" do not result in the driver-partner losing access to the Uber App while allegations are investigated. The Company notes that "dangerous driving" is a broad safety category and the specific examples provided (e.g. speeding, harsh braking) are the dangerous driving complaints that do not immediately warrant a driver-partner losing access to his or her account during investigation. For other, more serious complaints of dangerous driving, a driver-partner may be prohibited from receiving trip requests while Uber investigates further. Moreover, driver-partners may lose access to the Uber App for complaints that, while not considered "Urgent", are serious in nature or pose a safety concern. These complaints include but are not limited to alleged impairment, drowsy driving, and certain reports of traffic stops.

RECOMMENDATION 4	Partner with all transportation market participants to explore the development of a database to readily identify deactivated users to supplement the driver background check monitoring process.
RASIER-PA RESPONSE	Company partially accepts recommendation.

DISCUSSION

Uber shares the Audit Staff's concern about a legal problem with multiple layers: preventing "bad actors" who lose access to the Uber App for patterns of inappropriate behavior from partnering with other TNCs (and vice versa). Unless a driver-partner loses access to a TNC platform as a result of a disqualifying criminal conviction or motor vehicle violation, other industry participants do not have full information to determine whether such driver-partner is ineligible to gain access to other TNC platforms.

Uber partially accepts the Audit Staff's recommendation to partner with transportation market participants to explore solutions. Database development could be a step in the right direction, but itself presents new complexities. We commend the Audit Staff for alluding to such issues in its Report. Nevertheless, Jason Burch (Regulatory Counsel) and Kevin Kerr (Pennsylvania Public Affairs Lead), look forward to engaging external policy-makers and advising Uber's Operations teams on the topic. Such efforts began in 2018 and will continue well into 2019.

Yet while the Audit Staff outlines a broad recommendation for setting up a database of deactivated users to supplement driver background checks, Uber notes here only some of the due process, privacy, and operational complexities inherent in such database development.

- **Due Process:** As the Audit Staff notes, Uber maintains a robust safety program, leveraging both technology and specialized Community Support to investigate allegations. Driver-partners, however, may lose access to the Uber platform for a series of unsubstantiated allegations because such alleged behavior demonstrates poor customer service to riders and potential safety concerns. The Audit Staff notes as much in its Report. While Uber trusts the efficacy of its policies, and reviews those policies periodically to sustain effectiveness, driver-partners' due process must be honored at all times. Sharing details of unsubstantiated allegations with other industry participants, or a third-party, for purposes of limiting an individual's economic opportunities in the TNC industry would expose both Uber and the industry to liability.

- **Privacy:** The Audit Staff's recommendation very likely involves the disclosure/sharing of driver-partners' personally identifiable information (PII). No matter the recipient—government agency, non-profit, or other industry participants—such a prospect raises difficult privacy questions. For example, upon losing access to their driver-partner accounts, individuals cease their contractual relationship with Uber. Those individuals could then exercise their right to have their information deleted from Uber's records, subject to applicable laws, such as data retention laws.[2] Yet those individuals could not exercise such rights with respect to any recipients of PII under the Audit Staff's recommendation. Moreover, according to general principles of privacy law (in the US, and more in other jurisdictions), a presumption exists that PII will not be shared among private actors unless required by law or consented to by the individual. Thus, absent legislative solutions, an industry-wide initiative would not permit the sharing of PII as recommended by the Audit Staff. Finally, any system requiring listings on industry-wide or governmental list, in response to not-fully-substantiated allegations, likely would deter individuals of all walks of life from participating in the TNC industry. Uber commends the many non-TNC policy-makers throughout the US who have discussed this issue with Uber's regulatory counsels.

- **Operational Limitations:** Uber largely agrees with the Audit Staff's statement that any system or database that shares information regarding individuals who have lost access to a TNC platform must be created through a "joint effort between vehicle-for-hire service providers . . . or in concert with governmental agencies." Specifically, Uber believes the matter requires, at minimum, a legislative solution in Pennsylvania and a third-party governmental process to ensure that TNCs' confidential or proprietary information, such as a driver lists, is not shared with other industry members. Note, however, that such a joint effort is unlikely to fully alleviate the foregoing due process and privacy issues. Even where local laws require TNCs to report to regulators identifying information for driver-partners who have lost access to a TNC platform for "conduct that gave rise to a public safety concern,"[3] the operational issues remain intractable. Regulators have encountered difficulties reconciling various industry participants' safety standards. Regulators have not described the manner by which they protect a company's proprietary or confidential information. And regulators have not explained whether and to what extent they account for information about behavior on a platform that is not in operation in the relevant jurisdiction. Uber commends the Audit Staff for being receptive to a discussion of these issues, and it looks forward to further engagement on this very important issue that should be handled with care.

[2] See, e.g., 66 Pa.C.S. § 2604.2.
[3] *See* City of Chicago, Transportation Network Provider: Rules, RULE TNP 1.10 Notification of Deactivated Drivers.

RECOMMENDATION 5	Complete the development and implementation of key safety related initiatives.
RASIER-PA RESPONSE	Company accepts recommendation.

DISCUSSION

Uber takes its responsibility to contribute to the safety of its communities seriously and believes technology can help make transportation safer than ever. For example, in 2018, Uber introduced a number of safety features into the Uber App and the Company continues to research and develop additional tools to improve safety for users on the platform. The Audit Staff notes four (4) specific safety initiatives in its Report: Emergency Button/911 Integration; Ride Check; Beacon Lights; and Voice Command Functionality—and recommends that the company complete the development and implementation of such initiatives in a timely manner. The Company is grateful for the Staff's efforts to understand Uber's key safety-related initiatives and therefore accepts the recommendation.

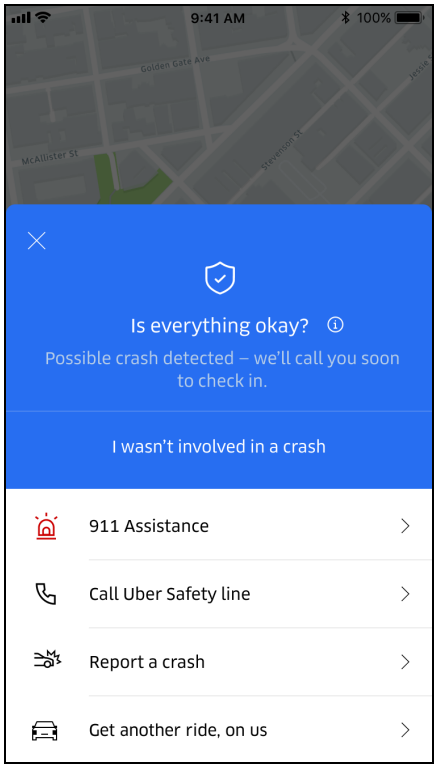
Uber provides below an update on the noted initiatives. Each of these products is managed by Calvin Pappas (Sr. Product Manager), Natasha Weaser (Product Operations Manager), and Krishnaja Gutta (Sr. Group Manager, Safety Products):

- **Emergency Button/911 Integration.** In 2018, Uber included an Emergency Button as a feature in the Safety Toolkit. Upon initial introduction, the Emergency Button was designed to connect the user directly with a 911 dispatcher. The ultimate goal, however, is to leverage the Uber App technology to provide the 911 dispatcher, automatically, with information about the user's GPS location and the TNC vehicle's details, including vehicle license plate number, make, and model. As the Report notes, in November 2018, 911 integration was in a testing phase. As of February 2019, 911 Integration in available in 60 cities and counties, including the following counties in Pennsylvania: Lancaster, Luzerne, Washington, Chester, and Bucks. The Company aims to add Philadelphia County by early 2020.

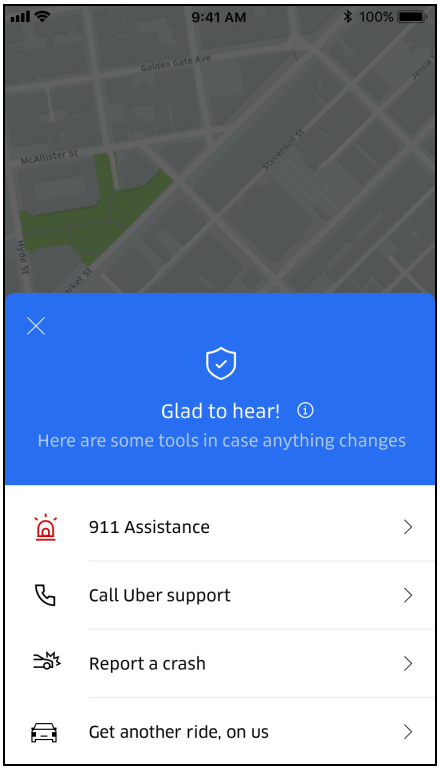
- **Ride Check.** In September 2018, Uber announced Ride Check, a safety feature designed to monitor a driver's phone accelerometer, GPS, and other sensors. The goal was to assist Uber's Incident Response Team in identifying unexpected events that may happen during the course of a trip, including motor vehicle collisions. In mid-January 2019, Ride Check launched in all of the United States and Canada, and is currently actioning 50% of

flagged trips while Uber's engineering team conducts additional testing. Included below are examples of Ride Check notifications sent to riders and driver-partners.

Ride Check - Rider App

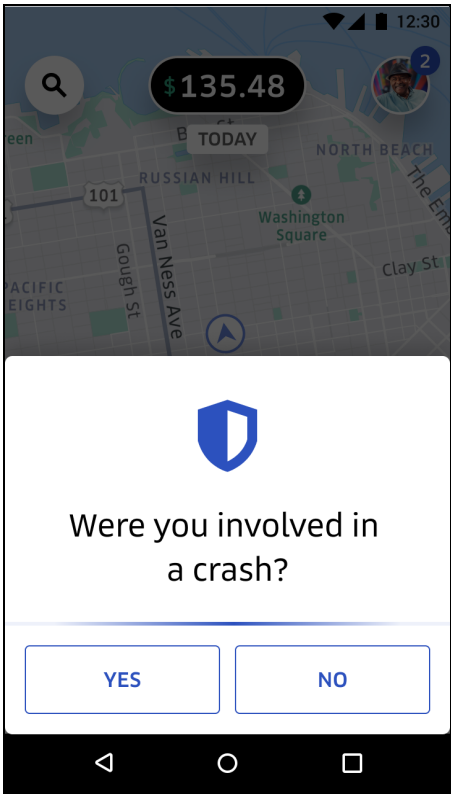


Rider Possible Crash Detection Notice

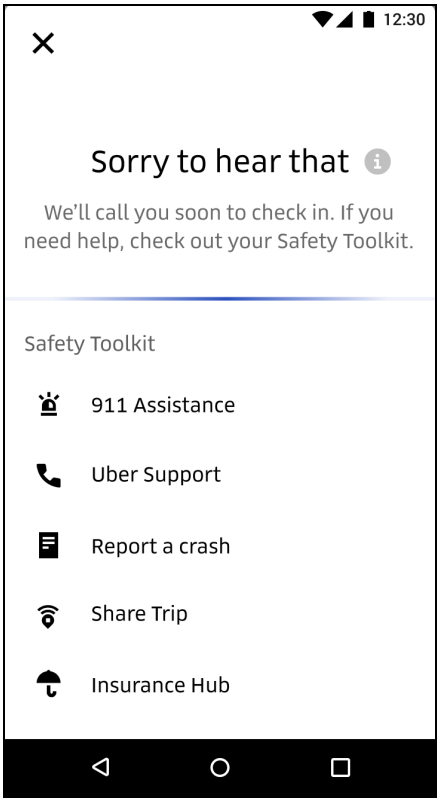


Rider False Positive Notice

Ride Check - Driver App



Driver Possible Crash Detection Notice



Driver Confirmed Crash Notice

- **Beacon Lights:** Although previous regulation created obstacles for driver-partners to use beacon lights in Pennsylvania, legislation passed in October 2018 paved the way for TNC drivers to use illuminated signs. As the Report notes, these colorized beacons give riders the option to select a customized color for the associated beacon on the applicable TNC vehicle to help ensure that riders locate the correct vehicle in busy areas, such as events or concerts. While beacons make the pick-up process easier, the accessory would be in addition to, not a replacement for, the current trade dress which all TNC vehicles are required to display while logged into the TNC platform. Nor would the beacon light replace the vehicle and driver information (including driver profile name and profile picture as well as vehicle license plate number, make and model) that is displayed in the Uber App.

- **Voice Command Functionality:** Uber continues to explore ways to leverage the driver app's functionality to promote better safety and greater hands-free use of the app for key functions. In particular, Uber is currently is testing voice commands for the accept trip function, so that drivers may remain focused on the road when a new trip request is offered. Broader rollout for the Pennsylvania commonwealth is expected to begin in the first half of 2020.

RECOMMENDATION 6	Reevaluate tracked performance metrics and establish goals for critical metrics.
RASIER-PA RESPONSE	Company partially accepts recommendation.

DISCUSSION

Uber would like to thank the Audit Staff for its detailed work to understand Company metrics and performance goals. Given the scope of its Review, however, Audit Staff were not able to review all data or interact with every subject matter expert in connection with Company metrics. As a result, Uber partially accepts the Audit Staff's recommendation to reevaluate tracked metrics and establish goals for critical metrics. Uber will continue this important work in 2019 under the direction of Frank Chang (Director, Data Science). Mr. Chang leads the Safety and Insurance Analytics team, a multi-disciplinary team consisting of data scientists, actuaries, as well as product, data, and business intelligence analysts. Core to that team's work, which will take under advisement the Audit Staff's recommendations, is the continuous review of metrics and performance goals to ensure harmony with Uber's critical business and safety needs.

Yet the Company would like to provide clarifications related to the performance metrics it tracks so as to round out this subject as described in the Report. See clarifications below.

- **Report:** The Safety Toolkit provides users with features to help ensure their safety during a trip. [Uber] does not monitor the use of these specific App features.

  Clarification: Uber's mobile applications monitor and track instrumentation and other usage information. The Safety Toolkit in the Uber App is not an exception. Monitoring the usage of that feature is core to the design of the experience—and fundamental to any technology company's products.

- **Report:** Furthermore, management in [Uber's] Community Support group indicated that the complaint channels utilized by users to file complaints were not tracked. Knowing how users file complaints would help the company understand user familiarity with options, preferences and habits for filing complaints, and identify the need for changes in complaint channels to meet customer demands or expectations.

  Clarification: In the event that Uber receives a safety-related complaint, the Company regards the substance of support processes the same, regardless of how a user reported the complaint. The approach ensures customers have the option to report concerns

through whichever channel they are most comfortable.

That said, Uber indeed keeps mechanisms to track where a report originated (with in-app support channel and Critical Safety Response Line being the two most notable within the safety-related complaint category). In response to the Audit Staff's data requests, the Company specifically reported sources through which certain complaints were submitted. Further, the broader customer support organization reviews, substantively, the total channel mix for customer reports (e.g., driver inbound phone, in-app support, in-person driver reports at Greenlight Hubs, etc.), ultimately striving to push users to the channel in which they will receive the best support relative to their needs.

Uber's customer service organization further examines the health of its safety complaint processes by reviewing metrics such as Service Level Agreements, Quality, Customer Satisfaction and Cost, among other things.

RECOMMENDATION 7 Formalize business process and procedure documentation.

RASIER-PA RESPONSE Company partially accepts recommendation.

DISCUSSION

Uber partially accepts the Audit Staff's recommendation to formalize the documentation of business processes and procedures. As an initial matter, the Company thanks the Audit Staff for its detailed assessment and recommendations. The Company respectfully disagrees, however, with the characterization that the sample workflows provided to the Audit Staff lack the key features of procedures.

While Uber does not seek to challenge the Audit Staff's statement that the sample workflows were "not contained in standalone procedures making them difficult to reproduce to third-parties (e.g., the Audit Staff)," its responses to the data requests demonstrated technology industry practice, as well as the breadth of the Company's operations. Notwithstanding the real-world applications of its business, Uber is a technology company operating in 600+ cities and 64 countries. Accordingly, standalone manuals for every process is incompatible with the flexibility required for a new business that continues to grow and adjust strategy based on real-world information. Indeed, most procedural workflows are stored in the Company's operating system and contain the key features of policies found at older utilities, such as version control and personnel ownership.

That said, Uber continues to grow and mature, and so does its documentation of key values, strategies, and goals. Uber is grateful for the constructive work of the Audit Staff throughout this this process, and takes under advisement the recommendation described in the Report. Under the leadership of Brian Hughes, with whom the Audit Staff discussed the Company's Pennsylvania operations, the Company will continue to drive forward, through the second half of 2019, current initiatives aimed at refining safety-related policies and procedures.

- **Migration of Safety Procedures to Salesforce:** As the Report notes, Community Support procedures currently reside in Uber's internal tools system. However, the Company currently is in the process of migrating certain procedures, including safety complaint procedures, to Salesforce applications. In its search for a system with greater capabilities, Uber selected Salesforce for its availability of international data centers, consulting responsiveness, and partnership in developing best practices for knowledge management. Because Uber operates globally, it is important that it builds for global scale. International data centers will provide increased uptime for tools critical to

providing timely support for safety-related incidents. Moreover, Salesforce has demonstrated best-in-class responsiveness for troubleshooting problems or building custom solutions that fit Uber's business needs. Phase 1 of this migration will include moving existing content to Salesforce, by Q3 2019. Phase 2, discussed below, will include optimization of content and building for greater scale—to be completed by first half of 2020.

- **Improved Knowledge Base:** At its inception, Uber's customer support procedures were designed to answer specific questions and achieve specific results. The goal of customer support agents was to troubleshoot and resolve a user's concerns. As Uber has scaled to a more significant size, however, and the issues routed to Community Support became more complex, the Company recognized that Community Support should focus on its overall policies and provide Community Support agents guidance yet flexibility to resolve issues with the parameters of a policy—rather than a pre-ordained process which may not suitable for the issue presented. Planning for knowledge base optimization will begin after content is migrated to Salesforce and will include feedback from all of Uber's lines of business.

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