Qualitative Analysis of Ridehailing Regulations in Major American Cities

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ABSTRACT

Ridehailing services, which are provided by companies such as Uber and Lyft, are increasingly common in many American cities. Several cities are now regulating or considering regulation of these services. However, this has not been well documented across jurisdictions, and city planners and policy-makers often want to understand what regulations are being put into place in comparable metropolitan areas. Therefore, the objective of this research is to qualitatively compare the regulations of ridehailing companies between major American cities. This was accomplished by evaluating five driver-related and three company-related types of ridehailing regulations in 15 major American cities. The driver-related regulations include requirements regarding background checks, driver’s licenses, vehicle registrations, special licenses such as business licenses, and external vehicle displays. The company-related regulations include requirements regarding the number of ridehailing vehicles operating in a metropolitan area, providing a list of drivers to the city, and sharing trip data with the city. The results of this qualitative analysis reveal that there is significant variation in the number of driver-related regulations imposed in the cities that were evaluated. Another key finding is that ridehailing companies may be less likely to operate in cities where fingerprint-based background checks are mandatory. As ridehailing regulations continue to evolve, this research can help planners and policy-makers better understand the current state of local regulations by providing a systematic comparison across major metropolitan areas in the United States.
INTRODUCTION

Ridehailing is an on-demand transportation service where “rides are arranged through mobile apps that connect a traveler with a driver operating his or her personal vehicle” (1). These on-demand services “add flexibility to rideshare arrangements by allowing drivers and passengers to arrange occasional shared rides ahead of time or on short notice” (2). They commonly utilize smartphone applications to match passengers with drivers using real-time information systems (3).

Ridehailing services, which are usually provided by privately-operated transportation network companies (TNCs), have been rapidly expanding in metropolitan areas in the United States. However, TNCs “frequently enter a new market without seeking prior approval of regulators” (1). Given how quickly ridehailing has emerged in many major American metropolitan areas, numerous local jurisdictions are now implementing regulations pertaining to ridehailing. In light of these changes, this research aims to take a first step toward systematically documenting and comparing regulations in major metropolitan areas in the United States.

The structure of this paper is as follows. First, literature pertaining to ridehailing regulations is briefly reviewed. This is followed by the objectives and methodology, and then, a classification framework for city regulations is proposed. Next, two types of regulations are discussed in detail: regulations on ridehailing drivers and regulations on ridehailing companies. Last, a comparison, conclusion and areas for future research are presented.

LITERATURE REVIEW

This section provides a brief summary of relevant ridehailing literature. Although there is previous literature on regulations of taxicab services and a paper analyzing taxicab regulations in various cities was used as a framework for this analysis (4), taxi-focused regulatory literature is not reviewed in detail here. Additionally, there is increasing discussion about ridehailing services in the legal community (e.g., 5, 6, 7, 8), but these papers are also not reviewed. Instead, this brief summary focuses on the planning and policy-making perspective pertaining to ridehailing regulations. Notably, there are two recent reports that highlight the public policy challenges and responses to regulating rapidly growing TNCs, which are discussed in the following paragraphs.

First, a report by the International Transport Forum (ITF) discussed four commonly shared features each city or jurisdiction faces when deciding how to regulate ridesharing companies, which are public safety rules, market entry conditions, service requirements, and fares (9). This report also presented four policy insights for regulating ridehailing companies, which are to “focus policy regarding for-hire passenger transport on the needs of consumers and society”; “keep the regulation framework of for-hire passenger transport services as simple and uniform as possible”; “encourage innovative and more flexible regulation of for-hire transport services”; and “embrace data-led regulation to improve societal outcomes.”

In a special report on the rise of technology-enabled transportation services by the Transportation Research Board, numerous transportation and regulatory challenges with TNCs were identified, including issues with ridehailing services pertaining to labor and employment, personal security and public safety, insurance, and equity and access. Moreover, it was concluded that there is “an uneven regulatory playing field affecting competition in jurisdictions that impose substantial regulations on taxis and lesser requirements on TNCs” and “inconsistent requirements for drivers and for vehicle safety and insurance for taxis and TNCs, requirements whose efficacy, in any case, lacks systematic assessment (1).”
As can be seen from this brief review, previous research has identified numerous public policy challenges with regulating ridehailing services; however, TNCs are still fairly new and regulations are rapidly evolving. Moreover, city planners and policy-makers often want to understand what regulations are put into place in other comparable metropolitan areas. Therefore, this paper begins to fill this gap by systematically documenting the current state of city regulations on ridehailing companies in the United States.

OBJECTIVE AND METHODOLOGY
The objective of this research is to provide a qualitative comparison of how major cities within the United States are responding to the emergence of new ridehailing services through various regulations. This analysis will help identify key similarities and differences in how cities approach ridehailing regulations by comparing regulations in 15 American cities. These jurisdictions constitute 15 of the 50 largest cities in the United States as measured by their population (10). Cities that had the largest amount of information readily available were selected for this analysis. The sources for this analysis are primarily city ordinances found on official city government websites, and the city ordinances were supplemented with relevant news articles to provide context around the local policy debate. An important caveat about this analysis is that only city-level, not state-level, regulations were assessed.

By studying several cities’ ridehailing regulations, one can gain insight into the different ways to handle rapidly expanding ridehailing business, and conclusions can be made about how certain city regulations affect the ridehailing company’s decision to operate.

CLASSIFICATION FRAMEWORK
The 15 cities studied in this analysis were grouped into two categories: Type A and Type B. Type A cities have regulations that have been passed and in turn, ridehailing companies have agreed to operate within those cities. Type B cities have passed ridehailing regulations but ridehailing companies have decided not to operate in those municipalities. At the time of writing, 13 of the 15 American cities studied fall in the Type A category and two of the 15 cities fall in the Type B category. These different categories and cities are displayed in Table 1.

REGULATIONS ON RIDEHAILING DRIVERS
For this analysis, two types of regulations were considered: regulations for the driver and regulations for the ridehailing company. Driver regulations were separated from company-level regulations because several ridehailing companies do not hire their drivers as employees, but instead drivers are considered independent contractors.

This section focuses on driver regulations, and within this group, five specific types of driver regulations were examined: (1) fingerprint-based background check requirements, (2) in-state driver’s license requirements, (3) in-state vehicle registration requirements, (4) additional license/permit requirements, and (5) external vehicle display requirements. The first dimension, fingerprint-based background check requirements, is for cities that require drivers to undergo mandatory fingerprint-based background checks. The second dimension is in-state driver’s license requirements. Since all drivers are required to have a valid driver’s license to operate a vehicle, this analysis focuses on cities where drivers are required to have a valid driver’s license from a specific state. Third, in-state vehicle registration requirements, similar to driver’s license requirements, include cities that require drivers to have vehicle registrations from a particular state. If a city requires drivers to have a valid driver’s license and valid personal vehicle...
registration with no special state requirements, this analysis does not consider these dimensions
to be a special requirement. Fourth is *additional license/permit requirements*, which is for cities
that require drivers to obtain additional licenses or permits aside beyond a regular driver’s
license, such as a driver’s license from a particular class, a business license, or a for-hire permit.
The last dimension, *external vehicle display requirements*, includes cities that require drivers to
have company signage (e.g., Uber/Lyft trade dress) or special license plates on their vehicle.

Table 2 displays the driver regulation requirements for the selected cities grouped by
type. The number of regulations refers to the number of requirements each city has based on the
five specified dimensions, and the table is organized in decreasing order of rank. Additionally,
the references are listed in the table next to the city to which they correspond.

**Type A: Regulations Have Been Passed and Ridehailing Companies Choose to Operate**

This section provides a brief discussion of the regulations in Type A cities. The first cities
discussed are Type A cities with the most regulations, having four of the five specified driver-
related dimensions. This is followed by a discussion of cities with three of the five specified
driver-related regulations. Finally, cities with zero to two of the five specified driver-related
regulations are examined.

### Type A Cities with the Most Regulations

New York City and Seattle have the most driver-related regulations out of the cities that were
analyzed, and both cities had regulations pertaining to four of the driver-related dimensions
examined in this analysis (11, 12, 13, 14). New York City requires all ridehailing drivers to
complete a mandatory fingerprint-based background check (11). Seattle, however, does not
require ridehailing drivers to be fingerprinted if they provide a background check from an
approved third party vendor (13, 14).

Seattle requires all drivers to have a valid in-state driver’s license (13, 14). Additionally,
both Seattle and New York City require ridehailing drivers to have an in-state vehicle
registration (11, 13, 14). In New York City, drivers with vehicle registrations from out-of-state
must be approved before they can operate (11).

The fourth dimension shown in Table 2 pertains to additional, special licenses or permits
for ridehailing drivers to legally operate. New York City requires drivers to obtain a For-Hire
Vehicle License as well as Taxi and Limousine Commission (TLC) license plates; the TLC
license plates must be displayed on the vehicle when in operation (11, 12). Seattle also has
special license requirements, which include a business license, a TNC vehicle endorsement, and
a TNC For-Hire permit (13, 14). Last, the ridehailing company’s trade dress must be displayed
on the vehicle in Seattle (13, 14).

### Type A Cities with Mid-Level Regulations

Nashville and New Orleans each have three of the five specified driver-related regulations (15,
16, 17). The second category shown in Table 2 reveals that both cities require ridehailing drivers
to have a valid in-state driver’s license (15, 16, 17). As can be seen in the third category of
Table 2, only New Orleans requires ridehailing drivers to have an in-state vehicle registration
(16, 17). The fourth dimension shown in Table 2 reveals that Nashville requires drivers to obtain
a For-Hire Driver’s Permit (15).

Both cities in this category require ridehailing vehicles to display some sort of trade dress
on the vehicle (15, 16, 17). Typically, trade dresses must be visible a certain distance away from
the vehicle, and in both New Orleans and Nashville, the company’s trade dress must be visible somewhere on the vehicle at all times when in operation (15, 16, 17).

Type A Cities with the Fewest Regulations
This group includes nine cities: Atlanta, Chicago, Dallas, Minneapolis, Portland, San Antonio, Washington, D.C., Miami, and Columbus. Each of these cities has zero, one or two of the five specified driver-related regulations (18-29).

First, San Antonio is the only city in this category that discussed fingerprinting as a part of its background checks in its ordinance (24); however, San Antonio appears to have recently moved to voluntary fingerprinting as part of its driver background checks for Uber and Lyft (25).

The second dimension in Table 2 shows that three of the nine cities have some sort of in-state driver’s license requirements. Minneapolis requires ridehailing drivers to have a valid driver’s license from the state of Minnesota or Wisconsin (22), and San Antonio requires ridehailing driver’s to have a Texas driver’s license (24). Similarly, Washington, D.C. requires a valid driver’s license from one of the following places: Washington, D.C., Maryland, or Virginia (26).

Only two of the cities have special vehicle registration requirements. Specifically, Dallas and San Antonio require ridehailing drivers to have an in-state vehicle registration (21, 24).

The fourth dimension in Table 2 reveals that Atlanta, Chicago, Dallas, and Portland require ridehailing drivers to obtain a special license or permit. Atlanta requires a For-Hire License Endorsement (18), Chicago requires drivers to obtain a Transportation Network Provider (TNP) Chauffeur License (20), Dallas requires drivers to obtain both a Dallas Driver Permit and Vehicle Permit (21), and Portland requires drivers to obtain a city business license (23).

Six of the cities in this category have some sort of external vehicle display requirement (18, 20, 22, 23, 26, 27). For example, in Atlanta where the city code focuses on vehicle operations at Hartsfield-Jackson Atlanta International Airport, the trade dress must be displayed on both sides of the vehicle in operation (18).

Type B: Regulations Have Been Passed and Some Ridehailing Companies Choose Not to Operate
This section provides a brief overview of the specific regulations in Type B cities, which includes two cities: Houston and Austin (30, 31, 32). Houston requires its drivers to undergo fingerprint-based background checks and thus, Lyft chose not to operate (31). In addition, Houston requires all drivers to have a valid in-state driver’s license, to obtain a Houston TNC license, and to display distinctive signage on the vehicle (30).

Austin has two out of the five dimensions analyzed in this study; however, this city has been controversial with its ridehailing regulations. The city of Austin decided to require fingerprint-based background checks (32) and thus, both Uber and Lyft decided to stop operations in the city (31).

REGULATIONS ON RIDEHAILING COMPANIES
Along with ridehailing driver regulations, cities also impose regulations on the ridehailing companies themselves. This analysis considers three dimensions of company-related regulations: (1) whether there is a limit placed on the total number of ridehailing vehicles in the city, (2) if ridehailing companies are required to provide a list of drivers to the city, and (3) if ridehailing companies are required to share data and statistics.
The first dimension, requirements limiting the number of ridehailing vehicles in operation, includes cities where there is a numerical limit on such vehicles anywhere within the city limits. The second dimension includes cities where ridehailing companies must provide a current list of drivers to the city to legally operate. The third and final dimension includes cities where ridehailing companies are required to share particular data and/or statistics with the city.

This information is summarized in Table 3, and like Table 2, the number of regulations refers to the number of requirements each city has based on the three dimensions analyzed. Table 3 is organized in decreasing order of rank, and references are listed in the table next to the city in which they correspond. The following section provides a discussion of each dimension.

Numerical Limits on Vehicles within the City
The first of the three dimensions of the company-related regulations is capping the number of ridehailing vehicles allowed to operate within a city. Currently, such regulations have only been passed in Atlanta for the Hartsfield-Jackson Atlanta International Airport (18). Specifically, the regulations state that the Aviation General Manager may limit the number of operating vehicles at the airport at any point for a certain period of time, but it is unclear if this has been done (19).

Requirements to Provide a List of Drivers to the City
The second of the three dimensions is providing a list of drivers to the city. Atlanta, New Orleans, New York City, Portland, and San Antonio have regulations that require ridehailing companies to provide a current list of drivers with the city (11, 16, 17, 18, 23, 24). The rationale behind this type of regulation primarily has to do with ensuring the safety of the public, particularly at places like airports. At Hartsfield-Jackson Atlanta International Airport, tracking software may be utilized to identify all ridehailing drivers in operation around the airport. All drivers should connect to the tracking software to allow the airport to accurately monitor the driver activity for safety reasons (18). Ultimately, a list of drivers allows cities to know exactly who is operating and thus, ridehailing operations become more transparent with the city.

Requirements to Share Data or Statistics with the City
The third dimension is sharing data and statistics with the cities. It is helpful for ridehailing companies to share data with the cities that they operate in because it allows city officials to better identify any potential issues or positive impacts that ridehailing is having on their respective community.

Twelve out of 15 cities listed in Table 3 have regulations that require the ridehailing companies to share some form of data or statistics with the city. This typically involves the location and time of trip pick-up or drop-off, the number of requested trips, the number of unfulfilled trips, the frequency of ADA trips, the crash history, and the criminal history of the driver. Certain cities require ridehailing companies to keep certain data available for a period of time for the possibility of it being requested. For example, Columbus and New Orleans can request specific data with a certain time period (16, 28, 29).

COMPARISON
After analyzing ridehailing driver regulations and ridehailing company regulations, different cities can be compared with one another on an overall basis. Figure 1 is a graphical representation of the 15 cities analyzed in this study by how many company and driver...
regulations they each have compared to one another. Cities that are towards the top and the right of the figure have more regulations, such as New York City, New Orleans, and Seattle. Cities that are shown near the bottom and left of the figure, such as Columbus, Miami, and Washington, D.C., have fewer regulations.

CONCLUSIONS

In the last ten years, ridehailing services have become increasingly common in major American cities. Many city governments have been implementing regulations differently, and there has yet to be a general policy consensus on how to properly handle ridehailing companies. Therefore, this research aims to take a first step toward systematically documenting and comparing regulations in 15 major metropolitan areas in the United States.

Key findings from this qualitative analysis include opposition to driver fingerprint-based background checks from ridehailing companies. Ridehailing companies argue that most of their drivers work part-time and are less likely to operate if they must partake in a time-consuming background check process. However, cities feel that this better ensures safety of their residents. Uber and Lyft both pulled out of Austin when new fingerprinting requirements for drivers were approved; however, a small number of cities such as New York City have passed such regulations and ridehailing companies remain (11, 31).

Another noteworthy finding is that Atlanta was the only city out of the 15 selected to mention imposing limits on the number of ridehailing vehicles allowed to operate. In this specific case, the limit only occurs at the airport, is not permanent, and does not appear to be enforced at any time (18, 19).

Additionally, some cities have passed regulations that require ridehailing companies to provide a list of drivers and to share trip data with city officials. By creating these requirements, city officials may be able to estimate how many ridehailing trips are being made, and this can provide them with a better understanding as to whether or not limiting vehicles is an appropriate regulation.

In summary, ridehailing services are rapidly growing, and it is largely up to local governments to embrace a regulatory framework that allows multiple transportation options to thrive. Many cities have begun to regulate ridehailing companies and if trends continue, there will likely be more cities with such regulations in the near future.

FUTURE RESEARCH

This research identified the differences in ridehailing regulations between various cities within the United States by examining the ordinances/rules in each city and supplementing these sources with press articles to provide context around the local policy debate. Future research could involve interviews with city officials as an additional source of information. Interviews could help shed light on the process of making policy decisions and understand how TNCs and taxi companies interact with the city government. In addition, interviews could be conducted with drivers from ridehailing companies to understand their opinions on city regulations.

This analysis focused solely on TNCs, but a comparison can be made with taxi companies and their respective regulations. This would provide more insight into how each city’s decision process compares in regulating TNCs versus taxis and why there may be a difference between the regulations.

A third area for future research could explore additional dimensions beyond the five driver regulations and three company regulations, such as driver insurance requirements.
Additionally, different weights could be applied to the various dimensions when analyzing how much a city is regulating ridehailing. For example, fingerprint-based background checks might have a larger weight compared to external vehicle display requirements.

An additional area for future research pertains to the cities examined in this study that require TNCs to share some form of data with the city on a regular basis. Future research should be conducted to identify how each city utilizes the data they receive from TNCs and how this helps them make decisions on city regulations.

Fifth, there could be correlation between ridehailing regulations and the demographic or political characteristics of the city. This was not included in the analysis, but it is an interesting topic that should be considered for future research.

Finally, an important caveat about this analysis is that only city-level regulations were assessed. However, ridehailing companies are increasingly regulated at the state-level, and many of the cities examined in this research also have state-level regulations. Of the cities that were analyzed, at least eight are located in states that appear to have passed some form of ridehailing related legislation (33-41). As ridehailing regulations evolve, future research should be done to analyze state-level regulations and compare them with city-level regulations.
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    network company drivers. 2016.
    March 14, 2017.
    2015.
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FIGURE 1 Visualization of Company and Driver Regulations by City
# Table 1: List of Cities by Classification

<table>
<thead>
<tr>
<th>Ridehailing Company Operations</th>
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<td><strong>Choose to Operate</strong></td>
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</tr>
<tr>
<td>Type A</td>
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</tr>
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<td>New Orleans, LA</td>
</tr>
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<td>New York, NY</td>
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<td>Portland, OR</td>
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<td>Seattle, WA</td>
</tr>
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<td>Minneapolis, MN</td>
<td>Washington, D.C.</td>
</tr>
<tr>
<td>Nashville, TN</td>
<td></td>
</tr>
<tr>
<td><strong>Choose Not to Operate</strong></td>
<td></td>
</tr>
<tr>
<td>Type B</td>
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</tr>
<tr>
<td>Austin, TX</td>
<td></td>
</tr>
<tr>
<td>Houston, TX*</td>
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</tr>
</tbody>
</table>

*Lyft does not operate in that city.*
### TABLE 2 Comparison of Driver Regulations by City

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<tr>
<td>City or County</td>
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<td>Sum</td>
<td>Mandatory Fingerprint-based Background Checks</td>
<td>In-State Driver's License Requirements</td>
<td>In-State Vehicle Registration Requirements</td>
<td>Additional License / Permit Requirements</td>
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<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes (In-state; out-of-state must be approved)</td>
<td>Yes (TLC license plates on vehicle)</td>
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<td></td>
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<td>Yes (In-state)</td>
<td>Yes (Business License, TNC Vehicle Endorsement, TNC For-Hire Permit)</td>
<td>Yes (Trade dress displayed on vehicle body)</td>
</tr>
<tr>
<td>Seattle, WA</td>
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<td>No</td>
<td>No (Optional fingerprinting or background check by approved third party vendor)</td>
<td>Yes (In-state driver’s license)</td>
<td>No</td>
<td>Yes (For-Hire Driver’s Permit)</td>
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<tr>
<td>(13, 14)</td>
<td></td>
<td></td>
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<td>Yes (In-state)</td>
<td>No</td>
<td>Yes (Trade dress must be visible on vehicle)</td>
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<tr>
<td>(15)</td>
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<td></td>
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<td>Yes (In-state)</td>
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<td>Yes (Trade dress must be visible on vehicle)</td>
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<tr>
<td>New Orleans, LA</td>
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<td>No</td>
<td>No</td>
<td>Yes (For-Hire License Endorsement)</td>
</tr>
<tr>
<td>(16, 17)</td>
<td></td>
<td></td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Yes (Trade dress displayed on driver side and passenger side of vehicle)</td>
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<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Yes (Distinctive signage must be displayed in front windshield passenger side)</td>
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<tr>
<td>(18, 19)</td>
<td></td>
<td></td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Yes (Distinctive signage/emblem such as signs/symbols on vehicle doors, roofs or grills, magnetic or removable trade dress)</td>
</tr>
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<td>Chicago, IL</td>
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<tr>
<td>(20)</td>
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<tr>
<td>(23)</td>
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*Atlanta ordinance specific to operation at Hartsfield-Jackson International Airport (18, 19).
## TABLE 2 Comparison of Driver Regulations by City (cont.)

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<th>City or County</th>
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<th>5</th>
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<tr>
<td>San Antonio, TX (24, 25)</td>
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<td>No (Voluntary fingerprinting under pilot/incentive program)</td>
<td>Yes (In-state driver’s license except for military and full-time students)</td>
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<td>Washington, D.C. (26)</td>
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<td>No</td>
<td>Yes (Driver's license from DC, MD or VA)</td>
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<td>No</td>
<td>Yes (Trade dress must be visible on vehicle)</td>
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<td>Miami, FL (27)</td>
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<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Yes (Trade marking must be displayed on vehicle)</td>
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<td>Columbus, OH (28, 29)</td>
<td>0</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No*</td>
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**Regulations Have Been Passed and Ridehailing Companies Choose Not to Operate (Type B)**

<table>
<thead>
<tr>
<th>City or County</th>
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<tr>
<td>Houston, TX* (30, 31)</td>
<td>4</td>
<td>Yes</td>
<td>Yes (In-state driver’s license)</td>
<td>No</td>
<td>Yes (Houston TNC License)</td>
<td>Yes (Distinctive signage must be displayed on vehicle)</td>
</tr>
<tr>
<td>Austin, TX (31, 32)</td>
<td>2</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Yes (Emblem displayed on vehicle)</td>
</tr>
</tbody>
</table>

* Lyft does not operate in that city (31).
* Not included in city ordinance (28, 29) but required by state code (33).
**TABLE 3 Comparison of Company Regulations by City**

<table>
<thead>
<tr>
<th>City or County</th>
<th>Sum of Regulations</th>
<th>Numerical Limits</th>
<th>Required to Provide List of Drivers</th>
<th>Required to Share Data and/or Statistics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulations Have Been Passed and Ridehailing Companies Choose to Operate (Type A)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Atlanta, GA <em>(18, 19)</em></td>
<td>3</td>
<td>Yes (Aviation General Manager may establish a limit at any given time)</td>
<td>Yes (via airport tracking software)</td>
<td>Yes (only by the request of the airport; such as patron name, flight number, pick-up and drop-off times and locations)</td>
</tr>
<tr>
<td>New Orleans, LA <em>(16, 17)</em></td>
<td>2</td>
<td>No</td>
<td>Yes (such as full name, date of birth)</td>
<td>Yes (only by the request of the city for a period of two or more years; such as trip requests, complaints, accepted trip requests, sign-in and sign-out driver logs, collision reports, service response time reports, criminal reports, lost property reports, and TNC vehicle identification information)</td>
</tr>
<tr>
<td>New York, NY <em>(11, 12)</em></td>
<td>2</td>
<td>No</td>
<td>Yes</td>
<td>Yes (such as patron name, pick-up and drop-off times and locations)</td>
</tr>
<tr>
<td>Portland, OR <em>(23)</em></td>
<td>2</td>
<td>No</td>
<td>Yes</td>
<td>Yes (such as number of fulfilled and unfulfilled requested trips, date and time of fulfilled and unfulfilled requested trips, trip duration, crashes, crimes)</td>
</tr>
<tr>
<td>San Antonio, TX <em>(24, 25)</em></td>
<td>2</td>
<td>No</td>
<td>Yes (such as full name, date of birth)</td>
<td>Yes (such as provide access to the TNC’s publically available rider software application for inspections and audits)</td>
</tr>
<tr>
<td>Chicago, IL <em>(20)</em></td>
<td>1</td>
<td>No</td>
<td>No</td>
<td>Yes (every month; such as pick-up and drop-off times and locations, vehicle make, vehicle model, vehicle registration information, traffic accidents)</td>
</tr>
<tr>
<td>Columbus, OH <em>(28, 29)</em></td>
<td>1</td>
<td>No</td>
<td>No</td>
<td>Yes (only by the request of the city for a period of six months; such as driver’s name, vehicle, license plate number, vehicle make, vehicle model, vehicle year, vehicle color, date of trip, total trip fare)</td>
</tr>
<tr>
<td>Dallas, TX <em>(21)</em></td>
<td>1</td>
<td>No</td>
<td>No</td>
<td>Yes (upon reasonable notice; such as dates and times of requested/accepted rides)</td>
</tr>
<tr>
<td>Minneapolis, MN <em>(22)</em></td>
<td>1</td>
<td>No</td>
<td>No</td>
<td>Yes (such as number and percentage of ADA trips, trips by zip codes, average trip length in time and distance)</td>
</tr>
<tr>
<td>Nashville, TN <em>(15)</em></td>
<td>1</td>
<td>No</td>
<td>No</td>
<td>Yes (Metropolitan Transportation Licensing Commission (MTLC) has a right to review records, such as patron name, pick-up and drop-off times and locations)</td>
</tr>
</tbody>
</table>
TABLE 3 Comparison of Company Regulations by City (cont.)

<table>
<thead>
<tr>
<th>City or County</th>
<th>Sum of Regulations</th>
<th>Numerical Limits</th>
<th>Required to Provide List of Drivers</th>
<th>Required to Share Data and/or Statistics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Seattle, WA (13, 14)</td>
<td>1</td>
<td>No</td>
<td>No (but have to keep this on record)</td>
<td>Yes (such as total number of rides, pick-up and drop-off locations by zip code, percentage of trips by zip code, percentage of trips requested but unfulfilled, number of collisions, number of requested rides for accessible vehicles, passenger complaints, crimes against driver reports)</td>
</tr>
<tr>
<td>Miami, FL (27)</td>
<td>0</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Washington, D.C. (26)</td>
<td>0</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

Regulations Have Been Passed and Ridehailing Companies Choose Not to Operate (Type B)

<table>
<thead>
<tr>
<th>City or County</th>
<th>Sum of Regulations</th>
<th>Numerical Limits</th>
<th>Required to Provide List of Drivers</th>
<th>Required to Share Data and/or Statistics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austin, TX (31, 32)</td>
<td>1</td>
<td>No</td>
<td>No</td>
<td>Yes (every month; such as number of requested trips, number of trips unfulfilled by zip code, number of vehicles logged into the TNC platform, number of pick-ups and drop-offs by zip code, number of requested ADA trips, number of unfulfilled ADA trips, number of ADA fulfilled trips, amount of time surge pricing is in effect)</td>
</tr>
<tr>
<td>Houston, TX* (30, 31)</td>
<td>0</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

* Lyft does not operate in that city (31).
FIGURE 1 Visualization of Company and Driver Regulations by City