



185 Berry Street
Suite 5000
San Francisco, CA 94107

November 29, 2021

VIA EMAIL

gglc@toronto.ca

General Government and Licensing Committee Members
Paul Ainslie (Chair)
John Filion
Stephen Holyday
Nick Mantas
Josh Matlow
Frances Nunziata

City of Toronto
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Re: Lyft Comments re. GL27.19; Update on Outstanding Vehicle-for-Hire Directives

Dear Committee Members,

Lyft, Inc. (“Lyft”) appreciates the opportunity to comment on GL27.19, *Update on Outstanding Vehicle-for-Hire Directives*. Lyft appreciates the work of the City Council (“Council”) and Municipal Licensing & Standards (“ML&S”) to implement the amendments to Toronto Municipal Code, Chapter 546 (the “Bylaw”) adopted following the 2019 Vehicle-for-Hire Bylaw Review. Lyft is generally supportive of ML&S’s recommendations to the Committee, including maintaining the temporary Accessibility Fund fee reduction, maintaining equity between taxicab licensing fees and PTC licensing fees, and improving the efficiency of the PTC driver licensing application process.

While we recognize the need to continually evaluate the regulatory structure governing PTCs, we believe that the Bylaw has accomplished the challenging task of recognizing the differences between various models within the vehicle-for-hire industry. We appreciate the Council and ML&S’s recognition of the impact that Covid-19 has had on businesses operating in Toronto and the City’s ongoing collaboration with Lyft to ensure that PTC services remain available to drivers and riders at a time when they need it most. We also appreciate the thoughtful approach and commitment to an emissions reduction strategy. Last year, our company [announced](#) a commitment to reach 100% electric vehicles on the Lyft platform by 2030, and we are eager to



185 Berry Street
Suite 5000
San Francisco, CA 94107

work in partnership with ML&S and the Council to accelerate driver adoption of electric vehicles and achieve the City's emissions reduction targets for the Vehicle-for-Hire industry.

However, Lyft has serious concerns with the Council's November 10th decision to immediately pause the issuance of new PTC driver licenses while ML&S develops components of driver training and accredits driver training courses and providers. Lyft has been supportive of the City's efforts to implement mandatory driver training and understood and appreciated ML&S's reasonable decision to delay implementation during the height of the pandemic. However, the immediate pause of licensing stemming from the November 10th action has already had a negative impact on thousands of drivers who sought out the opportunity to earn money using PTC platforms, met all requirements of the Bylaw, but were denied the opportunity to obtain a license. This pause has punished potential drivers and the ridesharing public (in the form of decreased driver supply) for something entirely outside of their control, at a time when many are still recovering from the economic devastation of Covid-19.¹ PTCs already apply strict screening standards to drivers upon application and annually thereafter and make resources regarding anti-discrimination and assisting individuals with disabilities available through web and app content. While mandatory training is a piece of the puzzle, suspending issuance of new PTC licenses harms those who benefit most from the presence of PTCs in Toronto. Therefore, now that ML&S has re-initiated its call for third-party training providers, Lyft recommends that the Council reverse this pause and permit ML&S to issue new PTC driver licenses as it completes the accreditation and implementation process described at page 20 of its Report. If an immediate reversal of the PTC driver license pause is not possible, we ask that the Council direct ML&S to complete accreditation and implementation by January 1, 2022 in order to keep to a minimum the amount of time new drivers are prevented from seeking earnings opportunities. Once training is in place for new drivers, we look forward to working with ML&S to develop a reasonable timeframe for when existing drivers seeking license renewal must complete required training.

Thank you for the opportunity to comment on GL27.19. We look forward to continuing to work with Council, ML&S and other stakeholders to ensure that safe, reliable and affordable rides are available across the City of Toronto and the surrounding area.

Sincerely,

Chris Thomas
Lyft Public Policy

¹ 25% of Lyft drivers said that they drove more during the pandemic because they were laid off, furloughed, or had their hours or pay cut because of COVID-19.