

## Written Testimony - Agenda Item 919/900

Agenda Item	Name or Organization	Position	Comments	Attachment	Created
900	Elizabeth Gallagher, Lyft Inc.	Support		Yes	10/24/23 12:50 PM



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Portland City Council  
C/O Mark Williams  
Interim Parking and Regulatory Group Director  
Portland Bureau of Transportation  
1120 SW 5th Avenue, Suite 1331  
Portland, OR 97204

October 24, 2023

**VIA EMAIL**

Re: October 25, 2023 Council Agenda - Proposed Changes to Portland City Code

Dear Portland City Council,

Lyft, Inc. ("Lyft") appreciates the opportunity to submit feedback in support of the proposed changes to Portland City Code Chapter 16 submitted by the Portland Bureau of Transportation ("PBOT").

These proposed changes are the result of PBOT's ongoing efforts, along with the Private for Hire Transportation ("PFHT") Advisory Committee, to solicit, listen to and act on feedback from PFHT drivers, companies and community members. The changes, particularly related to vehicle age limits, administrative citations, and driving history screening criteria, are common sense proposals that will have a real impact on PFHT drivers in the City of Portland. These changes would certainly further PBOT's goal of providing the best possible service to residents in the City of Portland - by both increasing the pool of drivers who are eligible to provide PFHT services, as well as increased availability of PFHT providers for passengers looking for a ride in the City.

Lyft strongly supports these changes and we commend PBOT for its leadership in pushing for these improvements to the PFHT program. Our feedback to each suggested change is listed below:

*2. Code Chapter 16.40 increasing the current for-hire vehicle age limit from 10 to 15 years to allow drivers to continue operating without additional financial impact.*

Increasing the age limit for a for-hire vehicle from 10 to 15 years will provide relief for PFHT drivers by increasing the period of time in which a vehicle can be used for transportation services in the City, while maintaining a reasonable vehicle age limit that is in line with such requirements in other jurisdictions. Under current regulations, PFHT drivers cannot operate vehicles with a vehicle age of over 10 years. Many drivers on the Lyft platform use their personal vehicles to provide these services, and when their vehicle ages out of this limit they often find themselves making a difficult financial decision, particularly with the rising cost of



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vehicles in recent years. This change would also align Portland with for-hire vehicle age regulations in other jurisdictions, such as Eugene, OR and Washington State<sup>1</sup>, which encompasses nearby Vancouver, WA.

*3. Through Administrative Rule (see attached document), Chapter 16.40 would allow the Program Administrator to exclude administrative motor vehicle suspensions from consideration for permitting.*

The proposal to exclude administrative motor vehicle suspensions from consideration in PFHT certification is a common-sense change that would result in more equitable permitting standards. Under current regulations, drivers are not eligible to be permitted as a PFHT driver if their driving privileges were suspended or revoked by any governing jurisdiction within the past 3 years.

Lyft has seen many cases where even drivers with a 5 star rating from passengers, who have completed thousands of rides serving passengers in the City of Portland, have had to be removed from the Lyft platform because of an administrative citation on their driving record - even though the citation was not issued as a result of unsafe driving, and not all indicative of the driver's ability to provide PFHT services. This change is therefore important from an equity standpoint - to ensure that drivers are not punished for administrative citations - which can result from financial hardship (i.e. failure to pay a ticket).

*4. Amending Code Chapter 16.40 driving history requirements to reflect a driver's ability to remain eligible for a PFHT permit just as long as they can demonstrate that they have had a valid driver's license for at least 365 days, within the 18-month period preceding the application submittal date. Currently a driver would be prevented from driving for a full year if they allow their driver's license to expire for a single day.*

The proposed shift to requiring drivers to demonstrate that they have had a valid driver's license for at least 365 days in the past 18 months, as opposed to one year of uninterrupted driving experience, is another sensible change that will provide relief for PFHT drivers. For example, in the past, drivers who have let their license lapse for a period of mere days are ineligible to provide PFHT services. As the intent of the regulation is to ensure that PFHT drivers in Portland have sufficient driving experience, an insignificant lapse in maintaining the valid status of their driver's license should not preclude them from serving as a PFHT driver for the following year. This proposed change ensures that PFHT drivers are experienced drivers, as well as allowing some flexibility for circumstances that may have led to a lapse in license renewal.

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<sup>1</sup> These vehicle age limits apply to the entire state of Washington with the exception of Seattle/King County. Vehicle age limits in Seattle/King County have not been enforced in recent years due to the ongoing COVID-19 pandemic and its impacts on the for-hire industry.



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Lyft appreciates the Portland City Council's consideration of these comments, and strongly recommends that the Council adopt these changes. We look forward to continuing to work together with PBOT and the PFHT Advisory Committee to support the PFHT program within the City of Portland.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Gallagher", followed by a horizontal line.

Elizabeth Gallagher  
Senior Regulatory Compliance Manager  
Lyft, Inc.