

# PBOT

PORTLAND BUREAU OF TRANSPORTATION

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**Jo Ann Hardesty** Commissioner **Chris Warner** Director

February 3, 2022

Senator Beyer, Co-Chair  
Representative McLain, Co-Chair  
Joint Transportation Committee  
900 Court Street, NE  
Salem, OR 97301

Dear Co-Chair Beyer, Co-Chair McLain, and Members of the Committee:

The City of Portland is writing in opposition to section one through eight of SB 1558, which would regulate transportation delivery companies and third-party food delivery platforms. We are very supportive of efforts to transition these industries to more environmentally sustainable practices. However, the proposals outlined in this bill have not been designed in collaboration with interested stakeholders and contain many significant changes to the rideshare industry.

As an example, the bill redefines rideshare service to exclude all the time that drivers spend waiting for and driving to pick up a passenger—which is estimated at half of all vehicle miles traveled (VMT) from rideshare services. This means that miles and emissions that occur when drivers are waiting for and driving to passengers do not count towards a company's carbon emissions targets. This severely undermines progress towards climate action goals. Additionally, this definition could have impacts on transportation network company (TNC) insurance requirements, eliminating requirements that TNCs provide Commercial and General Liability insurance when drivers are actively on the TNC app waiting for and driving to passengers, which could make the roads less safe and may force expensive insurance costs back onto drivers. Also, this definition could have implications for what is considered to be "working" time for drivers, thus impacting driver compensation and other workforce protections for drivers. This bill also proposed changes to the electric vehicle rebate program, potentially limiting access for low-income individuals, which would seem counter to the program goals.

We ask the committee to not move this legislation forward this session and instead convene an interim workgroup to develop a strong proposal that would transition transportation delivery companies to more environmentally sustainable practices.

Sincerely,



Chris Warner, Director  
Portland Bureau of Transportation



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