



May 7, 2024

Representative Joseph J. Solomon Jr., Chair
House Committee on Corporations
82 Smith Street
Providence, RI 02903

Re: H 8217, Relating To Public Utilities And Carriers -- Motor Passenger Carriers --
Non-Emergency Medical Transportation

Since 2014, Uber has enabled affordable transportation alternatives for Rhode Island residents. As Uber's rideshare service has grown, it has expanded its reach through Uber Health, Uber's HIPAA-supported ride-sourcing platform. Uber submits this comment in opposition to H 8217 which would create problematic new requirements around Non-Emergency Medical Transportation (NEMT) that if passed would jeopardize Uber's ability to provide these services in Rhode Island.

This bill contemplates establishing new requirements on who can operate as a NEMT driver, including requiring a new certificate from the Public Utilities Commission (PUC), accompanied by an annual fee, classifying all operators as common carriers, and requiring additional markings and inspections on the vehicles that perform NEMT services. These requirements may be appropriate for some emergency medical vehicles – but are not at all applicable to Transportation Network Company (TNC) drivers who perform NEMT trips in the State using their personal vehicles. In fact, the [TNC Statute](#) in Rhode Island explicitly states that a personal vehicle used by a TNC driver is not a "common carrier." And the motor vehicles as well as TNC drivers who operate in Rhode Island are already regulated by the PUC and required to meet rules established by the PUC in order to be eligible to drive.

Uber drivers on the platform in Rhode Island typically work part-time, have a valid personal driver's license, and meet the requirements as set forth in Rhode Island's TNC laws and [regulations](#). These requirements already include rigorous driver background checks, vehicle safety inspections, and the mandatory display of identifying placards. Uber drivers typically use their personal vehicles while driving on the app, and often drive on a part-time basis, as their schedule allows. It is unnecessary for Rhode Island Uber drivers to go through a second set of PUC licensing, registration, and inspection processes. It is also unlikely that TNC drivers seeking flexible work will undertake the time and expense to clear these new bureaucratic hurdles. Adding new barriers to eligibility for NEMT trips will limit the on-demand transportation options available to vulnerable Rhode Islanders seeking medical care. Further, classifying a TNC driver who uses their personal vehicle as a "common carrier" under Rhode Island law would be



completely out of line with how they operate. For the rideshare industry, current regulations already ensure adequate, economical, safe, and efficient service for the drivers who perform the trips and the riders who request rides.

Uber urges the legislature to reconsider this proposal which could have significant negative impacts on Uber's ability to provide NEMT transportation in the State.

Thank you for your consideration,

Hayley Prim
Senior Policy Manager at Uber