



600 Corporate Park Drive
St. Louis, MO 63105
314-512-5000
enterprise.com

August 9, 2017

Mr. Jason Cross
General Services Administration
Contract Specialist
1800 F St NW
Washington DC 20405

Re: On-demand passenger transportation (aka Rideshare / Ride-hail) services – Solicitation Number: QMAC-JC-17_0004-D

Mr. Cross,

On behalf of Enterprise Holdings – the world’s largest car rental company – we are writing to express serious concerns about the use of certain terms in solicitation number QMAC-JC-17_0004-D (On-demand passenger transportation (aka Rideshare/Ride-hail) services).

There are distinct and critically important differences between ridesharing and ride-hailing services. Enterprise has worked closely with Congress and other stakeholders to accurately define these terms in recently passed legislation. We appreciate that the solicitation utilizes and recognizes these definitions. However, we urge you to also eliminate any reference to the term “rideshare” in the title and within the solicitation.

As you know, the term “rideshare” historically has referenced services and programs whereby an unpaid driver and passengers share the cost of a trip. These services usually involve commuting and are commonly known as carpooling and vanpooling. We want to reference U.S. Code, title 23 section 101, as well as the guidance for section 146 of title 23. These provisions of law and accompanying guidance unambiguously and consistently define “ridesharing” as outlined above.

Further, the activities sought in the solicitation are actually ride-hailing, not ridesharing. While the solicitation clearly and accurately defines the terms Transportation Network Company as well as Innovative Mobility Technology Companies, use of the term “ridesharing” in the title and throughout other parts of the solicitation most likely will cause both operational and legal confusion.

Please consider that Enterprise has been providing genuine ridesharing services to the Federal government as well as to many communities across the country for more than 20 years. In fact, Enterprise Rideshare operates more than 12,000 vanpools and is one of the largest U.S. public-transit providers today (as measured in passenger miles).

We are sincerely alarmed by the potential long-term confusion that could result from inadvertently interchanging “ridesharing” and “ride-hailing” terminology in such an important government document.

There are three public sources that concur with and validate our position:

- In 2015, the Associated Press Stylebook clarified that services provided by TNCs were not ridesharing and determined that writers should utilize “ride-hailing” for describing the services offered by TNCs and Innovative Mobility Companies.
- Also, in 2015, the Association for Commuter Transportation, along with the University of California-Berkeley, issued a report that differentiates the terms.
- In 2016, the Federal Transit Administration introduced a series of reference documents, including a definition chart, which clearly separates ridesharing from ride-hailing.

Therefore, we respectfully request that you omit the term “ridesharing” from all future solicitations and notices that are directly related to or similar to QMAC-JC-17_0004-D. We believe this request will help avoid confusion and unintended consequences, which can only enhance the federal government’s transportation solicitation process.

If you have any questions, please do not hesitate to contact us. Ryan Johnson may be reached at 314-512-5560 or at Ryan.S.Johnson@ehi.com. Gordon Reel may be reached at 314-512-2979 or at Gordon.Reel@ehi.com.

Sincerely,



Ryan Johnson
Vice President
Rideshare by Enterprise



Gordon Reel
Vice President
Government and Public Affairs