

Federal Trade Commission  
Office of the Secretary, Room H-113 (Annex X)  
600 Pennsylvania Ave, NW  
Washington DC 20580

RE: Sharing Economy Workshop, Project No. P15-1200

Members of the Federal Trade Commission,

Thank you for the opportunity to provide comments for the upcoming Sharing Economy Workshop on issues raised by peer to peer business platforms. As the various sharing models are analyzed for future regulation, we ask that you consider the below points regarding transportation network companies (TNCs) on behalf of the credit unions in Georgia. TNC businesses help provide consumers an opportunity to utilize their personal vehicles to generate income through ride sharing. However, the use of personal vehicles in this capacity creates a gap in insurance coverage. If there is an accident while driving for a TNC, individual personal insurance typically would not apply as driving for the TNCs constitutes a commercial activity. This insurance gap, often unknown to the vehicle owner, creates a consumer protection issue and is detrimental to multiple parties:

- to the individuals that use TNCs for transportation,
- to the vehicle owners who mistakenly think their insurance will cover in peer to peer platform use,
- to the lien holders, the financial institutions who assume the risk in auto lending who are often unaware of the commercial use, and
- to individuals not associated with the peer to peer platform that find themselves in an accident with a vehicle operated by a TNC.

The workshop posed several questions for comment, ranging from consumer protection issues, importance of reputational systems, as well as creating a framework of regulation while keeping competition and innovation viable. It is no small thing to transport someone's child from point A to B. It takes trust, and in a sharing economy, the reputational "trust factor" is vital in the ongoing success of peer to peer platforms. Through the elimination of insurance gaps and creating greater transparency, this trust factor can be more secure.

While these concepts can be applicable to any sharing platform, in the case of the TNC model **we ask that the FTC consider four points for regulation to protect all parties and provide ongoing success of this peer to peer platform:**

1. Insurance coverage and parties should be clearly defined. Gaps in coverage created through the operation of TNCs should not be ignored ... nor should the responsibility of such be vaguely passed onto the individuals.
2. TNCs, as the creator, conduit and financial beneficiary of the use of the peer to peer platform, should be identified as the provider of primary first party insurance coverage at the same limits, coverage and deductibles as held by the driver personally. This is to ensure that the driver, passengers, as well as the collateral, are covered at all times while operating in the TNC. This would protect an individual's financial well-being and minimize the time their car is unable to operate in the TNC due to an accident.
3. Insurance coverage should begin the moment someone engages their personal property, for TNCs at "app on". This is to protect the driver, passengers and others (regardless of if they utilize TNCs) so that there is insurance coverage at all times ... and in the event of an injury or death there is a means of recourse.
4. Create greater environment of transparency and awareness: there should be disclosure to the financial institution when a vehicle is used in a TNC platform (lienholder notification) and the TNC should disclose to their employees what insurance coverage is in effect when, and what limits are provided under various conditions.

As TNCs have gained in popularity around the country there have been multiple attempts to address these concerns from a municipal or state-wide level with a patchwork of laws and ordinances. However, by addressing these regulatory issues on a national level there would be a basis of clarity and consistency for those that affected by the TNC business model ... for those businesses who operate in multiple states, the drivers who operate their personal vehicles for TNCs, consumers that utilize them for transportation, and the financial institutions that extend credit for the vehicles.

Respectfully submitted,

Brandee Bickle  
Senior Advocacy Officer