

BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY

In Re: Application of Whittlesea Blue Cab
and Henderson Taxi for a Pilot Program.

**Curb Mobility LLC's Petition for
Leave to Intervene**

COMES NOW, Curb Mobility, LLC ("Curb"), by and through its undersigned
counsel, and files this Petition for Leave to Intervene in the above-captioned matter.

Pursuant to NAC 706.894, Curb hereby states that:

1. It is a supplier of technology solutions to certificated taxicab operators, including Lucky Cab, Western Cab, Nellis Cab, Deluxe Cab, A Cab, NewCab, Yellow Cab, Checker Cab and Star Cab companies. Curb desires to operate a similar pilot program to the Applicants' pilot program with Lucky, Western and Nellis Cab companies, which certificated carrier customers use Curb's smart meter technology in their taxis.
2. Curb supports the application and wishes to participate to lend its support and to discuss the appropriate conditions for such pilot programs.
3. Curb has interfaced its technology platform with the Uber technology platform and currently operates similar programs in 8 cities throughout the United States. Such programs have been in operation for more than 6 months in 6 of those 8 cities, including Reno, Nevada.
4. Curb intends to provide evidence of the success of those programs and, in particular, the increase in driver productivity and driver earnings.
5. As with the Applicant's proposed pilot program, under Curb's proposal all relevant taxes, surcharges, fees, and assessments applicable to taxi trips are included within the fare (collected by Uber) and passed through to the appropriate parties/agencies through the local taxi operator.
6. Fares for the program will be consistent within Uber's existing upfront dynamic model. Riders will be provided with a fare upfront which will not change regardless of whether the ride is assigned to a private vehicle or taxi. Fares to drivers will be provided upfront as well, and the fare offered to the driver will be the total fare they are compensated for the ride (pre-tip, and/or any other additional fees to help increase a driver's compensation within Uber's existing operating model such as "wait-time fees").
7. Uber App users who are selecting ride options from Uber's menu can get a licensed taxicab to service their ride by choosing that option, which causes the

Uber platform to refer the ride offer to Curb's ehail platform for fulfillment, where drivers of taxis with Curb's smart meter technology can have the option to accept, decline and/or ignore the offer. If a ride is assigned to such a taxi, the Uber rider will be able to identify this through being notified and provided vehicle specific information within the Uber app.

8. The drivers will have the same User experience as they currently have for accepting Curb ehail trips, as rides will be coming in through Curb's ehail platform and in-vehicle smart meter. The Uber driver app will not be utilized for vehicles operating with Curb's smart meter technology.
9. The program will be voluntary. Drivers interested in receiving referrals through this program will opt-in directly with Curb and receive referral trips. Drivers who choose not to participate will have the option to opt-out at any time with Curb, in which case, they will not receive referrals. Drivers who have opted out can also rejoin the program at any time, if they change their minds.
10. Curb will be able to provide data on the program to the extent needed for the Taxicab Authority to assess the results of the pilot program. Such information as provided within the past to other regulatory bodies includes:
 - a. Rider and Driver payment;
 - b. Taxi meter fares for the same rides conducted through the Uber referred program;
 - c. Industry feedback; and
 - d. Program impact analysis.

Based on its experience with similar programs in other cities, Curb will be able to offer valuable perspective to the Taxicab Authority for its consideration of whether to allow the Applicant's pilot program as well as the pilot program proposed by Curb with Lucky, Western and Nellis Cab. Attached hereto is a letter of support from Lucky, Western and Nellis Cab.

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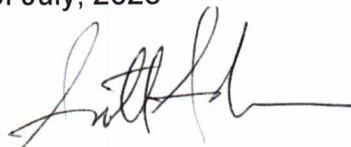
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1 We respectfully request that Curb be permitted to intervene in this proceeding and
2 allowed to conduct its own pilot program with Lucky, Western and Nellis Cab.

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4 Respectfully submitted this 1st day of July, 2025

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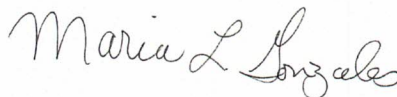
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CERTIFICATE OF MAILING

I, Maria Gonzales, do hereby certify that on July 1, 2025, I deposited in the U.S. mail, postage prepaid, via First Class Mail, and email, a true and correct copy of the foregoing **1) Curb Mobility Petition for Leave to Intervene** to the following:

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Dated this 1st day of July, 2025.



Employee of Brownstein Hyatt Farber Schreck