



**STEEL  
RYDE**



# **STEEL RYDE LLC PUC APPLICATION EXHIBITS COMBINED POLICY & COMPLIANCE GUIDEBOOK**

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Operating Area:  
Lehigh Valley, Pennsylvania

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## 1.0 DIGITAL NETWORK DESCRIPTION (PUC EXHIBIT)

Steel Ryde LLC

Digital Network Description

Written explanation of how the Steel Ryde digital network operates (riders, drivers, pricing, onboarding/deactivation, safety, payments).

Effective Date: January 22, 2026

Document Type: PA PUC TNC Application Supporting Exhibit

Confidential – Prepared for submission to the Pennsylvania Public Utility Commission (PUC) as part of Steel Ryde LLC's Transportation Network Company (TNC) application packet.

### 1. PURPOSE AND SCOPE

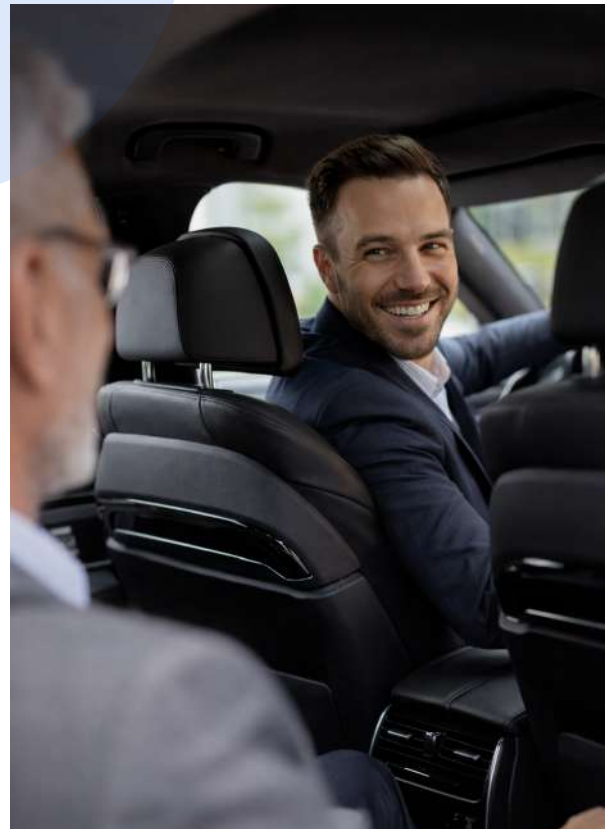
This document describes Steel Ryde LLC's digital network operations for Transportation Network Company (TNC) service in Pennsylvania, including Lehigh Valley. It explains the rider request flow, driver acceptance flow, pricing logic (including current MVP pricing defaults), driver onboarding and deactivation procedures, safety features, and payment handling.

### 2. SERVICE MODEL OVERVIEW

Steel Ryde LLC is the regulated TNC operating entity. Omollo Tech Solutions LLC owns the underlying software platform, app store developer accounts, and technical infrastructure, and licenses the technology to Steel Ryde LLC under a platform services agreement. Steel Ryde LLC controls driver activation, rider access, fare collection, payouts, customer support, and regulatory compliance.

### 3. RIDER RIDE-REQUEST PROCESS

1. Account creation & verification: Rider creates an account using phone/email and verifies contact information.
2. Trip entry: Rider enters pickup location (GPS or typed address) and destination, selects ride type (e.g., Standard).
3. Fare estimate: App displays an estimated range prior to confirming the request. Final fare is determined by the app at completion (based on actual distance/time, tolls, and applicable fees).
4. Request submission: Rider taps "Request Ride," creating a trip request with timestamp, pickup, destination, and ride type.
5. Matching: The system identifies available nearby drivers who meet eligibility criteria (active status, documents on file, and no restrictions).
6. Driver acceptance: When a driver accepts, the rider sees driver photo/name, vehicle info, and ETA. Riders may cancel per cancellation policy.
7. Trip execution: Driver navigates to pickup, verifies rider identity (name confirmation + app-based trip confirmation), then starts trip in-app.
8. Trip completion: Driver ends trip in-app. Fare is finalized and payment is captured. Rider receives receipt in-app/email.





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## 4. DRIVER ACCEPTANCE PROCESS

1. Go-online: Driver toggles “Online” in the app. System confirms eligibility (documents valid, background check status, no suspensions).
2. Offer broadcast: Nearby eligible drivers receive the trip offer with pickup distance/time, estimated earnings range, and trip type.
3. Accept/decline: Driver may accept within the countdown window. If declined or timed out, request cascades to other drivers.
4. Post-accept obligations: After acceptance, the driver must proceed to pick up and complete the trip unless a valid safety or operational exception exists.
5. No street hails: Drivers are prohibited from accepting off-app rides or letting non-approved individuals operate the account.

## 5. PRICING LOGIC (CURRENT MVP DEFAULTS)

Steel Ryde uses app-calculated pricing. During MVP, Steel Ryde’s Standard ride economics are locked as follows:

Metric	Locked MVP / Default Value
Average rider price (Standard)	\$10.25 (average target)
Driver earnings (Standard)	\$8.75 – \$9.25 per average ride (target range)
Platform earnings (Standard)	\$1.50 – \$1.75 per average ride (target range)
Default split (steady state)	Driver 75% / Platform 25%
MVP commission ladder	Month 1: Driver 100% / Platform 0%; Month 2: 90%/10%; Month 3: 80%/20%; Month 4+: 75%/25%
Rider offer (MVP standard)	Ride 4 Reward: Complete 3 rides \$5–\$7 off the 4th ride (no free rides during MVP)
Flex Fare / Personal Service (MVP)	Minimum distance 5 miles; Minimum distance fare \$14; Extra mile \$1.25; Hold \$0.30/min; Night increment 6%; not exposed by default

Pricing shown to riders is an estimated range. Final fare is based on actual route distance/time and any applicable tolls/fees per the app at trip completion. Drivers receive earnings per the active commission rules and any approved incentives. Incentives (if used) are time-boxed and zone-specific and do not reduce driver pay unless explicitly stated.



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## 6. DRIVER ONBOARDING

Steel Ryde activates drivers only after required documentation and screening is completed. Minimum onboarding elements include:

1. Identity verification: Government ID verification and selfie match.
2. Background screening: Pennsylvania criminal history, national criminal search, sex offender registry check, and motor vehicle record (MVR).
3. Vehicle documentation: Registration, proof of insurance, inspection/condition verification per Steel Ryde standards.
4. Policy acknowledgements: Acceptance of driver terms, safety policies, zero-tolerance drug/alcohol policy, nondiscrimination policy, and no-substitution rules (only the approved driver may operate).
5. Training: In-app onboarding covering safety, rider verification, incident reporting, and complaint handling.
6. WAV drivers (if enabled) must complete ADA/WAV-specific training and verification before activation.



## 7. DRIVER DEACTIVATION AND SUSPENSION

Steel Ryde uses progressive enforcement with immediate deactivation for critical safety violations. Deactivation triggers include:

1. Safety & integrity: suspected impersonation/account sharing; allowing another person to drive; assault/harassment; threats; weapons violations; serious reckless driving; or credible intoxication allegations.
2. Policy violations: off-app rides, fraud, repeated cancellations, refusal to comply with investigations, or



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falsified documents.

3. Compliance failures: expired insurance/registration, failed re-checks, or loss of eligibility.

4. Process: reports are logged, drivers may be temporarily suspended pending investigation, evidence is reviewed (trip logs, app telemetry, communications), and a final decision is documented. Appeals may be offered where appropriate, except for zero-tolerance or severe safety events.

## 8. SAFETY FEATURES

1. Driver identity in-app: rider sees driver photo/name, vehicle and plate information prior to pickup.

2. Rider verification: pickup confirmation via rider name + app trip confirmation; drivers are trained to avoid mismatched pickups.

3. In-app trip tracking: GPS trip logs (pickup, route, drop-off, timestamps).

4. Support escalation: in-app support and phone support with incident escalation pathways for safety issues.

5. Zero-tolerance policy: drugs/alcohol prohibited while providing TNC service; immediate suspension on credible reports.

6. Document controls: required periodic re-verification of insurance and documents; auto-deactivation for expired coverage.

## 9. PAYMENT HANDLING AND RECEIPTS

Steel Ryde uses electronic payments through its payment processor (e.g., Stripe). The typical flow is:

1. Authorization: rider payment method is authorized when a ride is requested or initiated, depending on configuration.

2. Capture: payment is captured at trip completion based on final fare.

3. Payouts: driver earnings are calculated automatically and disbursed as per payout rules (standard scheduled payouts; optional instant payouts subject to risk controls).

4. Receipts: rider receives an itemized receipt in-app/email, including pickup/drop-off, time, distance, and total charge.

5. Disputes/refunds: rider disputes are logged, reviewed, and resolved with documented outcomes; if refunds are issued, the system records the refund reason and amount.

## 10. REFERENCES

Key legal references commonly used for PA TNC filings include Pennsylvania Consolidated Statutes governing TNCs (Act 164 / Chapter 57A) and the PUC's TNC licensing guidance and application materials. Steel Ryde maintains current copies of applicable requirements and will provide records to the Commission upon request. Digital Network Safety Feature Alignment (MVP)

1. Driver Account Integrity System (NON-NEGOTIABLE): live selfie checks before going online, randomly during shifts, and on suspicious behavior (device change/location anomalies) with liveness detection; enforcement = 1 failure logout, 2 failures 72-hour suspension, 3 failures permanent ban.

2. Comprehensive background screening before activation and ongoing eligibility monitoring; automatic deactivation for failed checks.

3. Commercial insurance enforcement aligned with PA PUC TNC requirements; expiration tracking and auto-deactivation for expired/invalid coverage.

4. Trip transparency and traceability: GPS tracking, time-stamped trip logs, immutable record retention.



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5. In-app SOS / emergency escalation: one-tap SOS, location sharing, incident logging for follow-up.
6. Zero-tolerance drug & alcohol policy: immediate suspension pending investigation; permanent deactivation for confirmed violations; documented outcomes.
7. Real-time monitoring and anomaly detection: route deviations, unusual durations, abnormal location behavior flags for review integrated with integrity enforcement.
8. Rider/Driver rating system: pattern-based review, threshold enforcement, repeat offender tracking.
9. Data retention & compliance controls: secure retention of trips, driver info, complaints, incidents with access control and audit readiness.
10. Platform-controlled onboarding & deactivation: Steel Ryde controls access; no bypass of safety checks; re-verification after suspension; no shared accounts.



## **2.0 ZERO-TOLERANCE DRUG & ALCOHOL POLICY (PUC EXHIBIT)**

Steel Ryde LLC

Zero-Tolerance Drug & Alcohol Policy

Policy describing prohibition, complaint intake, investigation/suspension, and record retention for drug/alcohol issues during TNC service.

Effective Date: January 22, 2026

Document Type: PA PUC TNC Application Supporting Exhibit

Confidential – Prepared for submission to the Pennsylvania Public Utility Commission (PUC) as part of Steel Ryde LLC's Transportation Network Company (TNC) application packet.



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## 1. POLICY STATEMENT

Steel Ryde LLC maintains a zero-tolerance policy regarding the use of drugs or alcohol by drivers while providing Transportation Network Company (TNC) service. Drivers may not provide TNC service while impaired, under the influence, or with detectable impairment from alcohol, illegal drugs, or misuse of prescription medication.

## 2. SCOPE

This policy applies to all Steel Ryde drivers and any person acting on behalf of Steel Ryde in connection with providing TNC service in Pennsylvania. It applies during the following periods:

- Period A: Driver is logged into the Steel Ryde app and available to receive trip requests.
- Period B: Driver has accepted a trip request and is en route to pick up a rider.
- Period C: Rider is in the vehicle from pickup until drop-off (active trip).

## 3. DEFINITIONS

**Impairment:** Any condition that reduces a driver's ability to operate a vehicle safely (including alcohol, drugs, or misuse of medication). **Reasonable suspicion:** A credible report, observation, or evidence suggesting a driver may be impaired (e.g., slurred speech, erratic driving, odor of alcohol, admission of use). **Credible allegation:** A complaint supported by specific facts, timestamps, trip ID, or multiple consistent reports.

## 4. PROHIBITED CONDUCT

1. Driving or attempting to provide TNC service while under the influence of alcohol or illegal drugs.
2. Misuse of prescription drugs that impairs driving ability.
3. Consumption of alcohol during Period A/B/C.
4. Refusal to cooperate with a safety investigation related to impairment.
5. Allowing another person to drive under the driver's account (impersonation).

## 5. COMPLAINT INTAKE PROCESS

Steel Ryde provides multiple channels for riders and the public to report suspected intoxication or impairment:

1. In-app support: Rider selects "Safety Issue" then "Suspected Impairment/Intoxication."
2. Phone support: Safety line or support number (documented call logs).
3. Email/web form: Safety email intake for written reports.

For each complaint, Steel Ryde records: trip ID, date/time, rider contact, driver ID, narrative description, and any supporting evidence (photos, messages, witness details).

## 6. IMMEDIATE SAFETY RESPONSE

If a report is received during an active trip, support personnel will:

1. Advise the rider to prioritize safety and, if in immediate danger, to call 911.
2. Attempt to contact the rider and driver (if safe) to assess the situation.
3. End the trip in the system when appropriate to stop further dispatch to the driver pending investigation.



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## 7. INVESTIGATION AND SUSPENSION PROCEDURE

Steel Ryde uses a documented investigation workflow:

**Step 1: Temporary suspension:** Driver is placed in a suspended status pending investigation when a credible allegation exists.

**Step 2: Evidence collection:** Review trip telemetry (GPS, timestamps), in-app messages, rider/driver statements, and any third-party evidence.

**Step 3: Driver notice:** Driver is notified of the allegation and asked to provide a statement within a defined timeframe.

**Step 4: Decision:** Steel Ryde documents findings and outcome: reinstatement, extended suspension, or permanent deactivation.

**Step 5: Reporting:** Where required, Steel Ryde cooperates with law enforcement and PUC inquiries, providing records upon request.

## 8. ENFORCEMENT OUTCOMES

1. **Permanent deactivation:** Confirmed impairment, credible multiple reports, refusal to cooperate, or any severe safety event.

2. **Suspension + remediation:** If not confirmed but concerns remain (e.g., concerning behavior), Steel Ryde may require retraining before reinstatement.

3. **Reinstatement:** If evidence does not support the allegation, driver may be reinstated with documentation.

## 9. NON-RETALIATION AND CONFIDENTIALITY

Steel Ryde prohibits retaliation against any rider or driver who reports safety concerns in good faith. Investigations are handled with confidentiality to the maximum extent practical, sharing information only with those who need it to resolve the matter or as required by law.

## 10. RECORD RETENTION FOR DRUG/ALCOHOL COMPLAINTS

Steel Ryde retains records related to drug/alcohol complaints, investigations, and enforcement actions for at least 2 years (and longer when a claim, dispute, litigation held, or PUC request requires). Records include complaint logs, communications, trip data references, and outcome decisions.

## 11. DRIVER ACKNOWLEDGEMENT

Drivers must acknowledge this policy electronically during onboarding and whenever updated. Steel Ryde retains verification of receipt/acknowledgement. decisions.

## 12. REFERENCES

Pennsylvania's TNC framework includes a zero-tolerance requirement for drugs/alcohol during TNC service. Steel Ryde maintains compliance with applicable statutes and PUC guidance and will provide policy and records upon request.



## 3.0 DATA RETENTION & COMPLIANCE POLICY (PUC EXHIBIT)

Steel Ryde LLC

Data Retention & Compliance Policy

Records Steel Ryde retains (trip records, driver records, complaints, incident reports) and how they are secured, accessed, and produced to PUC.

Effective Date: January 22, 2026

Document Type: PA PUC TNC Application Supporting Exhibit

Confidential – Prepared for submission to the Pennsylvania Public Utility Commission (PUC) as part of Steel Ryde LLC's Transportation Network Company (TNC) application packet.

### 1. PURPOSE

This policy defines Steel Ryde LLC's record retention and compliance controls for TNC operations in Pennsylvania. It covers trip records, driver documentation, complaints, incident reports, and supporting system logs needed for safety, regulatory, insurance, and dispute resolution.

### 2. PRINCIPLES

1. Availability: Records must be retrievable and producible to the Pennsylvania Public Utility Commission (PUC) upon request.
2. Integrity: Records must be protected from unauthorized alteration and tracked with audit history where feasible.
3. Confidentiality: Access is role-based and limited to legitimate business purposes.
4. Minimum retention: Steel Ryde retains core operational records for a minimum of 2 years, and longer when required by claims, disputes, audits, or legal holds.

### 3. SYSTEMS OF RECORD

Steel Ryde maintains operational data in secure cloud systems (e.g., Firebase/Firestore, cloud storage, and payment processor records). Data is backed up and access-controlled. Production exports may be maintained in Big Query or equivalent analytics stores for reporting and audit support.





## 4. RECORD CATEGORIES AND RETENTION SCHEDULE

Record Category	Examples	Minimum Retention	Storage/Owner
Trip Records	Trip ID, rider/driver IDs, pickup/drop-off, timestamps, route telemetry (GPS), fare, cancellations	2 years (longer if claim/dispute)	Operations / Secure DB
Driver Records	Identity verification, background check status, MVR, insurance uploads, vehicle docs, training acknowledgements	2 years after deactivation (longer if claim)	Compliance / Secure DB
Complaints & Support Tickets	Rider complaints, driver complaints, call logs, chat transcripts, outcomes	2 years (longer if unresolved)	Support / Ticketing
Incident & Safety Reports	Accidents, assaults, suspected impairment, law enforcement requests, emergency escalations	2 years (longer if claim)	Safety / Compliance
Payment & Settlement Records	Stripe charges, refunds, payouts, disputes, reconciliation logs	2 years (tax/finance may require longer)	Finance / Payments
Policy Acknowledgements	Stripe charges, refunds, payouts, disputes, reconciliation logs	2 years	Compliance
Audit & Access Logs	Driver receipt of disclosures and policies, updates, consent logs	2 years	Security / Ops



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## 5. COMPLAINT AND INCIDENT RECORD WORKFLOW

1. Intake: Complaints are logged with a unique ticket ID and linked to the related trip or driver where applicable.
2. Triage: Safety issues are escalated immediately; non-safety issues follow standard support workflows.
3. Investigation: Evidence is gathered including trip logs, messages, and statements; enforcement actions are recorded.
4. Closure: Tickets are closed with an outcome summary and remain searchable and exportable.

## 6. DATA SECURITY CONTROLS

1. Role-based access controls limit administrative permissions.
2. Multi-factor authentication is enforced for privileged accounts.
3. Encryption is applied to data at rest and in transit.
4. Audit logs track key administrative actions.

## 7. LEGAL HOLDS AND EXTENDED RETENTION

Records subject to litigation, claims, or regulatory review are placed on legal hold. Deletion schedules are suspended until the hold is released.

## 8. PRODUCING RECORDS TO THE PUC

Records are produced electronically upon PUC request, handled by Compliance staff, logged internally, and delivered within required timelines.

## 9. DISPOSAL AND DELETION

After retention requirements are met and no legal hold applies, records are securely deleted or anonymized. Deletion actions are logged where feasible.

## 10. POLICY REVIEW AND UPDATES

This policy is reviewed annually and updated as required by law, PUC guidance, or operational changes.

## 11. REFERENCES

Pennsylvania Consolidated Statutes governing Transportation Network Companies (Chapter 57A) and Pennsylvania Public Utility Commission guidance.