



March 11, 2026

The Honorable Kriselda Valderrama
Chair
House Economic Matters Committee
Taylor House Office Building, Room 362
6 Bladen Street
Annapolis, MD 21401

RE: Oppose HB 1584 - "Delivery Network Companies and Delivery Network Services - Regulation and Transparency"

Dear Chair Valderrama and members of the Committee:

On behalf of Chamber of Progress – a tech industry association supporting public policies to build a more inclusive society in which all people benefit from technological advancements – **I respectfully urge you to oppose HB 1584.**

While we share the bill's goals of transparency and worker protection, this legislation would regulate delivery couriers through a public utilities framework that does not fit the industry, creating barriers for Maryland workers and requiring disclosures that do not match how delivery platforms compensate their workers.

HB 1584 would create new barriers for Marylanders who depend on delivery work for flexible income

HB 1584 would require individual delivery couriers to obtain a license from the Public Service Commission before they can accept a single order. To our knowledge, no state in the country requires *individual workers* to hold a government-issued license to make app-based deliveries. Public utility regulation exists to oversee natural monopolies and critical infrastructure, not competitive, multi-platform markets like delivery.

App-based delivery work is a critical lifeline for many Marylanders, and adding a PSC licensing process creates new barriers to accessing it. A majority of delivery workers

are women, and 70% of app-based grocery delivery workers identify as women.¹ Many are caregivers, immigrants, or people balancing multiple jobs who turn to delivery work precisely because of its accessibility. More than a third of app-based workers also hold full-time jobs, and one in five balance unpaid caregiving responsibilities.² 69% say the work helped them earn money in an emergency, and 63% say it helps them cover rising costs.³ Layering a government licensing requirement on top of the vetting that platforms already perform adds friction and delay without a corresponding safety gain.

HB 1584 's misaligned reporting requirements would confuse, not clarify

Beyond the licensing burden, HB 1584's reporting and receipt mandates rest on a flawed model of the industry. The bill appears modeled on rideshare, where a single consumer pays for a ride and the platform takes a share. Delivery operates differently. Revenue flows from multiple directions: consumers pay fees, merchants pay commissions, and platforms set worker compensation separately based on factors like estimated time, mileage, and demand. Because these revenue streams are independent, disclosing one as a percentage of another produces figures with no meaningful relationship to how workers are paid.

Consider what the required disclosures would look like in practice. A courier who delivers a sub sandwich and then a surf and turf dinner, covering similar distances in similar time, could see wildly different percentage breakdowns simply because one order cost more than the other, even though the work involved was the same. In some cases, a worker's pay could appear to exceed 100% of what the consumer paid in fees, while in others it might look like a small fraction, even though the worker earned the same amount both times. Rather than clarifying compensation, these disclosures would make it harder for workers and consumers to understand what they are seeing.

The per-delivery receipt requirements also ignore how platforms manage order routing. When nearby orders are grouped into a single trip to reduce wait times and increase courier earnings, the mandated breakdowns cannot cleanly apply across multiple consumers within one work assignment. Forcing platforms to disaggregate these trips for disclosure purposes could either eliminate the practice, lowering worker pay, or produce per-order figures that bear little resemblance to the courier's actual experience.

¹ Instacart. "Understanding the Shopper Community: A Report." *Instacart*, Jun. 8, 2023. <https://www.instacart.com/company/shopper-community/understanding-the-shopper-community-a-report/>

² PublicFirst and Flex Association. *U.S. App-Based Rideshare and Delivery Economic Impact Report*. Mar., 2024. <https://www.flexassociation.org/wp-content/uploads/2024/03/Flex-Economic-Impact-Report-2024.pdf>

³ *Ibid.*

For these reasons, **I respectfully urge you to oppose HB 1584.** We would welcome the chance to work with the Committee on delivery worker protections and transparency measures that reflect how the industry actually operates.

Sincerely,

A handwritten signature in black ink, appearing to read "Brianna January". The signature is fluid and cursive, with the first name being more prominent.

Brianna January
Director of State & Local Government Relations, Northeast US