



International Association of Transportation Regulators (IATR)
P.O. Box 844, Lewiston, NY, 14092; Website: www.iatr.org
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SUPPORTING THE PRACTICE OF FOR-HIRE TRANSPORTATION REGULATION

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August 5, 2011

Silvan B. Lutkewitte, III
Chairman
Independent Regulatory Review Commission
14th Floor
333 Market Street
Harrisburg, PA 17101

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Dear Chairman Lutkewitte:

I am the President of the International Association of Transportation Regulators (IATR), a not-for-profit organization comprised primarily of for-hire ground transportation government regulators from around the world. The IATR shares best practices and works together for common regulatory goals that endeavour to benefit passengers, the ground transport industry and other stakeholders.

I have extensive experience in the government regulation of for-hire vehicles, including limousines. I served as Commissioner and Chairman of the New York City Taxi and Limousine Commission (TLC) for eight and one-half years, where I was the agency's longest serving Chief Executive Officer overseeing 450 employees, a budget of over \$29 million, and annual revenues in excess of \$40 million. I was appointed and reappointed by former New York City Mayor Rudolph W. Giuliani, current Mayor Michael R. Bloomberg, and unanimously approved by the New York City Council. The TLC licenses and regulates the country's largest for-hire ground transportation industry – which includes taxicab, black car, community car service, limousine, paratransit/ambulette and commuter van businesses. These multi-billion dollar industries transport over one million passengers daily, and the TLC licenses and regulates approximately 100,000 drivers, over 50,000 licensed vehicles and over 900 businesses. Before serving as TLC Commissioner, I served as the agency's chief legal counsel for five and one-half years: as General Counsel to the Commission and Deputy Commissioner for Legal Affairs beginning in 1998, and before that, as Special Counsel to the TLC Chair - supervising over 75 lawyers and Administrative Law Judges. I have served in New York City government for 16 years, 14 of which were at the TLC.

In addition to my prior experience, I currently serve as a Distinguished Lecturer with the City University of New York's (CUNY's) Transportation Research Center (UTRC) at The City College of New York. The Transportation Research Center is one of ten original University Transportation Centers established in 1987 by the U.S. Congress. These Centers and their faculty members provide a critical link in resolving national and regional transportation problems while training the professionals who address our transportation systems and their customers on a daily basis. It represents the U.S. Department of Transportation's Region II, which includes New York, New Jersey, Puerto Rico and the U.S. Virgin Islands.

Both the Philadelphia Parking Authority (PPA) and the Pennsylvania Public Utilities Commission (PUC) are members of the IATR. Our organization has a great relationship with both regulators, and each has contributed to its betterment over the years.



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The IATR supports the sound, fair and effective regulation of for-hire ground transportation. While the IATR takes no position as a general rule on whether either a State or a locality can more effectively regulate specific industries, based on the facts presented to our organization, we fully support the Philadelphia Parking Authority's regulatory model. It is IATR's position that it is preferable, where a government has established a regulatory entity - whether local, state, regional or provincial - that it is more effective and practical as a general rule for "all" for-hire ground transportation services to be regulated by a single entity.

With the authority of Act 94 of 2004, the PPA sought to implement the best regulatory practices and procedures among its peers. Mandatory GPS technology along with the safety and enforcement benefits it affords, credit card acceptance in all taxicabs and stringent rules and requirements over the use and delivery of dispatch services, as well as setting higher standards for brokers, lenders and insurers, have created a regulatory program that is considered among the most comprehensive in the nation.

These reforms were not easily achieved and challenges to the PPA's program continue to the present time. The final-form of the regulations now before IRRC, while no longer containing the significant service upgrades promised to Philadelphia's riding public in the PPA's proposed regulations upon their release last year, will provide the Authority with the continuity and strength to move forward in the face of various pending legal challenges.

I respectfully support the efforts of the Philadelphia Parking Authority and urge the Independent Regulatory Review Commission to take this into consideration when deciding whether to approve the final form rulemaking at your August 25, 2011 meeting.

Sincerely,

A handwritten signature in black ink that reads "Mathew W. Daus".

Mathew W. Daus, Esq.

President

International Association of Transportation Regulators