



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

Re: Philadelphia Parking Authority
Final Rulemaking Order (Regulation ID No. 126-1 IRRC No. 2885)

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Dear Chairman Lutkewitte:

Please accept this letter as an expression of support for the approval and adoption of the above referenced Final Rulemaking.

During my tenure as a Member of the Philadelphia City Council I have witnessed the efforts of three different governmental entities to properly regulate Philadelphia's taxicab and limousine service providers. Since 2005 there has been a steady improvement in the condition and cleanliness of the vehicles used to provide those services and a noticeable reduction in illegal service providers. These are the first meaningful improvements to these services in decades and have been caused by the regulations of the Philadelphia Parking Authority ("Authority").

I understand the reasons behind the Authority's participation in the Commonwealth agency regulatory promulgation process that has placed this matter before the Independent Regulatory Review Commission ("Commission"). I also understand the need for the stability that will emanate from the implementation of the Authority's final-form regulations. Too many taxicab and limousine owners are currently operating without vehicle inspections or basic driver background checks that should be performed by the Authority. This dangerous scenario must end.

The Authority's final-form regulations will end that rogue behavior and restore the growth and stability we have come to expect from the Authority's oversight of Philadelphia's taxicabs and limousines. Therefore, I write to express my support for the Authority's final-form regulations and to respectfully request that the Commission approve those regulations at its August 25, 2011 meeting.

Sincerely,

Brian J. O'Neill
Councilman, 10th District