



CITY OF PHILADELPHIA
CITY COUNCIL

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COUNCILMAN-AT-LARGE

2885

July 27, 2011

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

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Re: Final Rulemaking Order (Regulation ID No. 126-1 IRRC No. 2885)
Philadelphia Taxicab and Limousine Regulations

Dear Chairman Lutkewitte:

I write to express my support for the Philadelphia Parking Authority's Taxicab and Limousine Final-form Regulations and to respectfully request that the Independent Regulatory Review Commission ("Commission") approve those regulations at its August 25, 2011 meeting.

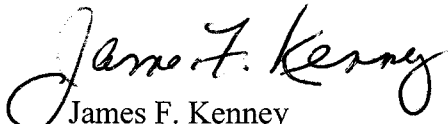
As a Member of the Philadelphia City Council over the past 20 years, I have had many occasions to interact with the Authority and its staff. I have found the Authority to be both efficient and responsive in the implementation of its tasks, many of which are assigned by the City of Philadelphia. I have also observed the Authority's regulation of Philadelphia's taxicabs and limousines since 2005.

Taxicab and limousine services directly impact Philadelphia's ability to draw businesses, tourists, and additional residents. I support the goal of Act 94 of 2004, which directed the Authority to develop a clean, safe, reliable, and well regulated taxicab and limousine industry. While I believe that room for improvement remains as to those service providers, I can say without hesitation that the Authority has made great strides in bringing about the goal of Act 94.

I am deeply concerned about the fact that many taxicab and limousine owners are refusing to permit the Authority to inspect their vehicles or screen their drivers for criminal convictions and negative driving histories. Those refusals are based on purported uncertainties about the Authority's current regulations following litigation surrounding the state/local status of the Authority.

Because the final-form regulations before you now will permit the Authority to continue its work to improve taxicab and limousine service and end those claims of uncertainty among some regulated parties, I recommend that the Commission approve those regulations and permit them to become effective as soon as possible.

Respectfully,


James F. Kenney
Councilman-At-Large