

CITY OF PHILADELPHIA

CITY COUNCIL

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JOAN L. KRAJEWSKI COUNCILWOMAN-6TH DISTRICT

July 28, 2011 Silvan B. Lutkewitte, III Chairman Independent Regulatory Review Commission 14th Floor 333 Market Street Harrisburg, PA 17101

Re:

Philadelphia Taxicab and Limousine Regulations

Final Rulemaking (Agency/ID No. 126; IRRC No. 2885)

Dear Chairman Lutkewitte:

I write to respectfully request that the Independent Regulatory Review Commission ("Commission") approve the Philadelphia Parking Authority's ("Authority") final-form taxicab and limousine regulations at its August 25, 2011 meeting.

Since 2005 the Authority has ably regulated taxicabs and limousines in Philadelphia. The condition and operation of those vehicles has noticeably improved during that time. I believe it is important that the Authority be able to continue to raise the level of service provided by those common carriers.

As the Chair of the Committee on Appropriations for the Philadelphia City Council, I fully understand the need to consider the financial impact of the Authority's regulations. That is why I believe the Authority's decision to eliminate the progressive changes planned in its proposed regulations in favor of advancing revenue neutral final-form regulations that maintain the regulatory status quo in Philadelphia was wise. While I certainly endorse the introduction of newer vehicles, increased liability insurance and generally heightened vehicle standards, I agree with the Authority's findings that those issues can be addressed in subsequent rulemakings with detailed financial analyses and public input.

The implementation of these regulations is simply too important to chance to disputes over the costs of heightened service requirements. Therefore, I urge the Members of the Commission to vote to approve the final-form regulations.

Sincerely,

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