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August 5, 2011

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

2011 AUG -8 P 2: 31

Dear Chairman Lutkewitte:

I write today in support of the Philadelphia Parking Authority's (PPA) Taxicab and Limousine Division (TLD) and its final form regulations which are now being reviewed by your Commission members.

While I have only been President & CEO of the Philadelphia Convention & Visitors Bureau (PCVB) since January, my predecessor, Tom Muldoon played an integral role in development of the Taxicab and Limousine Regulations currently in use by the Authority. Nonetheless, I feel confident in stating my own belief that the Authority has done an admirable job in regulating what is universally considered to be a difficult industry and service to regulate. I am aware of the legal challenges the Authority has faced with respect to this regulatory program and believe their decision to simply reformat the current regulations along Pennsylvania State guidelines in order to maintain consistency and a safe environment for the riding public is the right one under the circumstances.

Through this regulatory program, the PPA has vastly improved many aspects of taxicab and limousine service including the benefits derived from installation of state of the art GPS technology in all cabs allowing not only navigational assistance to drivers but taxicab and driver tracking at all times by PPA regulated dispatchers and by PPA-TLD Enforcement. This alone has allowed for much easier and more frequent recovery of passengers' lost property as well as the ability to remotely shut down any taxicab's system by the TLD in emergency situations. Additionally, rear passenger compartment credit and debit card acceptance equipment was installed and mandated for use in all taxicabs at the same time. Passage of the Authority's final form regulations at this time will not only provide stability and certainty in an environment where some service providers do not believe they need to follow the rules but will pave the way for the next level of world class improvements to taxicab and limousine service in Philadelphia.

I urge the Independent Regulatory Review Commission to approve the Philadelphia Parking Authority's final form Taxicab and Limousine Regulations at your meeting on August 25th.

Sincerely:

Jack Ferguson

President & CEO

Philadelphia Convention & Visitors Bureau (PCVB)