

**Simon & Everett Abitbol**  
The Abitbol Family of Companies  
641 North Broad Street, Philadelphia PA 19123  
215-236-2700 (p) 215-236-1500 (f)  
everett@moneymaxfunding.com sabitbol@moneymaxfunding.com

2885

August 3, 2011

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

RECEIVED  
IRRC  
2011 AUG 18 A 9 31

Re: Regulation 126-1 (IRRC# 2885)  
Philadelphia Taxicab and Limousine Regulations

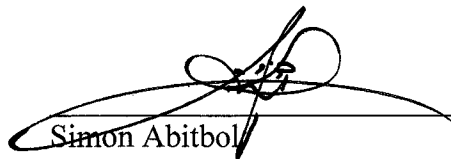
Dear Chairman Lutkewitte:

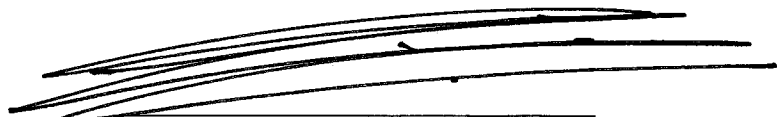
We have reviewed the Philadelphia Parking Authority's revised proposed regulations regarding taxis and limousines, and note great improvement from what the PPA originally submitted to IRRC. This occurred because the process worked. We submitted comments. The IRRC staff met with us and used our comments in its response to PPA. PPA staff met with us and the revised regulations adopted our most critical comments. We thank all involved.

As much as the revised regulations are improved, there are still areas for improvement and clarification. We stand ready to work with the PPA and IRRC to improve these regulations such that taxi service in Philadelphia is improved. We concurrently are writing to the PPA (copy attached) about areas where we feel clarification or waivers might be necessary to allow for the seamless implementation of these new regulations.

Given the uncertainty about court cases regarding the status of the regulations PPA has been using for many years, we believe that these regulations, warts and all, should be approved by IRRC, with PPA's pledge to work with stakeholders on refining them in the future and in implementing them so as to not cause unnecessary economic dislocations that are not in the public interest.

Sincerely,

  
Simon Abitbol

  
Everett Abitbol

cc: Philadelphia Parking Authority