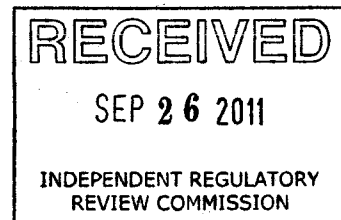


Germantown Cab Co.

800 Chestnut St. Ste. 103
Philadelphia, PA 19107
P: (215) 733-0461 F: (215) 733-0464



September 24, 2011

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

Dear Chairman Lutkewitte:

Germantown Cab Company submits the following as our public comments regarding the driver certification standards contained in the proposed PPA regulations. You will find information pertaining to our assertion that these regulations represent unnecessary burdens on our company, and potentially create situations where we are regulated under conflicting and overlapping standards.

Germantown Cab Company is required to comply with Chapter 29 of the PA Code regardless of PPA's regulations; therefore, in some instances we have placed the applicable sections of both the PA Code and the PPA's proposed regulations before our comments. We have done this to illustrate the problematic nature of the dual regulation and the conflicts it creates.

<p>§ 29.502. Current driver's license required.</p> <p>A common or contract carrier may not permit a person to operate a vehicle in its authorized service unless that person has a current, valid driver's license.</p>	<p>PPA 1021.4 (6) Unless otherwise permitted by the Authority, the applicant does not have a driving history in the United States of at least 1 continuous year prior to the date of application.</p>
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The above regulations differ in that the PPA requires a driving history of "at least 1 continuous year." This presents a problem for drivers who either have violated a payment plan with the City for traffic violations, failed to pay child support, or a multitude of other violations and thus have had their driver's license suspended. This is harmful to the public, the operator, and drivers, especially those in high poverty, low income areas. A driver may have lost a license for a short period for reasons unrelated to violations of rules of the road. The difficulty increases because the operator relies on a certain number of drivers who would now be unexpectedly unable to

drive. The public is now underserved and revenue is lost for no reason. The operator and its insurance carrier investigate the driver and his background. They are able to make inquiry to determine why the license was suspended. This should be sufficient for the PPA as the regulation is not rational. It also conflicts with the General Assembly's declaration in Act 94 that regulation of the taxicab industry can and should avoid "unemployment, the spread of poverty and the heavy burden of public assistance and unemployment compensation" (§ 5701.1).

<p>§ 29.503. Age restrictions.</p> <p>A common or contract carrier may not permit a person to operate a vehicle in its authorized service unless that person is at least 21 years of age.</p>	<p>1021.4 (5) The applicant is 20 years of age or younger.</p>
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Germantown Cab Company operates in a unified territory which includes areas outside the PPA's jurisdiction. This is one more example of conflicting regulations that make it expensive to operate a business where drivers and the operator are subject to different regulations and there is constant flow between the two jurisdictions. If five percent of my drivers happen to be twenty years old, I would incur penalties for each of these drivers under the PUC. Penalties, fines, and disruption of service will be costly in terms of money and time lost for all.

<p>§ 29.505. Criminal history.</p> <p>(a) Criminal history record required. A common or contract carrier may not permit a person to operate a vehicle in its authorized service until it has obtained and reviewed a criminal history record from the Pennsylvania State Police and every other state in which the person resided for the last 12 months. For current drivers, carriers shall obtain a criminal history record by November 9, 2006.</p> <p>(b) Frequency of record check. Following receipt of the initial criminal history record, a common or contract carrier shall obtain and review a criminal history record for each driver operating under its authority from the Pennsylvania State Police every 2 years from the date of the last criminal history check.</p> <p>(c) Disqualification. A common or contract carrier may not permit a person to operate a vehicle in its authorized service when the person was convicted of a felony or a misdemeanor under the laws of the Commonwealth or under the laws of another jurisdiction, to the extent the conviction relates adversely to that person's suitability to provide service safely and legally.</p> <p>(d) Record retention. A copy of the criminal history shall be maintained by the common or contract carrier for at least 3 years.</p>



. § 1011.5. Ineligibility due to conviction or arrest.

(a) Except as provided in subsection (e), a person is ineligible to own any interest in any right issued by the Authority if the person, or a person having a controlling interest in the person or a key employee, has been subject to a conviction as defined in § 1011.2 (relating to definitions) in the past 5 years and for 6 months from the date the convicted person completes the sentence imposed, including incarceration, probation, parole and other forms of supervised release.

(b) In the event a regulated party owning a transferable right becomes ineligible to hold rights issued by the Authority due to a conviction, the regulated party shall immediately cease use of the rights and initiate the sale of the rights to an eligible person as provided in Chapter 1027 (relating to sale of rights) within 180 days of the conviction.

(c) A regulated party or applicant shall inform the Director within 72 hours of being subject to an arrest or conviction as defined under § 1011.2.

(d) In the event a criminal prosecution is initiated against a regulated party for a crime that may lead to a conviction as defined in § 1011.2, the Enforcement Department or Trial Counsel may place the subject rights out of service as provided in § 1003.32 (relating to out of service designation). [initiate a formal complaint against the regulated party as provided in § 1005.11 100

(relating to formal complaints generally) and seek the immediate suspension of rights pending the conclusion of the criminal proceedings.]

(e) A person subject to an order of Accelerated Rehabilitative Disposition shall be ineligible to own any interest in any right issued by the Authority until the terms of the order have been completed.

This section is illegal and unfair. It violates due process and is contrary to state law.

The PUC regulation provides at Title 52 Pa. Code Chapter 29.505:

(a) Criminal history record required. A common or contract carrier may not permit a person to operate a vehicle in its authorized service until it has obtained and reviewed a criminal history record from the Pennsylvania State Police and every other state in which the person resided for the last 12 months.

(c) Disqualification. A common or contract carrier may not permit a person to operate a vehicle in its authorized service when the person was convicted of a felony or a misdemeanor under the laws of the Commonwealth or under the laws of another jurisdiction, to the extent the conviction relates adversely to that person's *suitability to provide service safely and legally*. (emphasis supplied)

The PPA must comply with Title 18 Pa. C. S. Section 9124. This section provides, in relevant part, as follows:

§ 9124. Use of records by licensing agencies.

(a) State agencies.--Except as provided by this chapter, a board, commission or department of the Commonwealth, when determining eligibility for licensing, certification, registration or permission to engage in a trade, profession or occupation, may consider convictions of the applicant of crimes but the *convictions shall not preclude the issuance of a license, certificate, registration or permit.*

(b) Prohibited use of information.--The following information shall not be used in consideration of an application for a license, certificate, registration or permit:.....

(5) *Convictions which do not relate to the applicant's suitability* for the license, certificate, registration or permit.

The regulation permits the PPA to prevent a person from working without due process, without any individual evaluation, and for a conviction without regard to suitability to operate cab, an acknowledged low paying occupation. Moreover, the regulation goes even further, it considers arrests for what constitutes summary offenses to disqualify a person without even a conviction.

“The Commonwealth has consistently interpreted Article I, Section 1 of the Constitution to include an individual's right to engage in any of the common occupations of life.” *Hunter v. Port Authority of Allegheny County*, 277 Pa. Super. 4, 419 A.2d 631 (1980), *Adler v. Montefiore Hosp. Ass'n of Western Pennsylvania*, 453 Pa. 60, 311 A.2d 634 (1973), and *Gambone v. Commonwealth*, 375 Pa. 547, 101 A.2d 634 (1954). In *Adler*, supra, the Supreme Court stated: “[A] law which purports to be an exercise of the police power must not be unreasonable, unduly oppressive or patently beyond the necessities of the case, and the means which it employs must have a real and substantial relation to the objects sought to be attained.” *Adler*, 453 Pa. at 72, 311 A.2d at 640 (quoting *Gambone*, 375 Pa. at 551, 101 A.2d at 637).

“We cannot assume that the legislature intended such an absurd and harsh result.... Such a result runs afoul of the deeply ingrained public policy of this State to avoid unwarranted stigmatization of and unreasonable restrictions upon former offenders.” (*Johns Vending* at 494-95, 309 A.2d at 362).

Since the regulation itself bars persons from driving cabs even when not convicted, its provisions contain inconsistent statements. Not only does any felony conviction apply, without regard to suitability to perform, but it adds a provision barring a person when there has been only an arrest for a summary offense. There is no rationale to this. Because most ARD cases involve summary offenses or perhaps a minor misdemeanor charge, until the charges are dismissed the driver is barred. There is no individual analysis regarding the charges or evaluation of the circumstances. In addition, a person arrested for other offenses, even though on bail, is punished as a matter of law and presumed guilty because he is barred from driving a cab while contesting the charges. The inability to work would only cause additional strain on the courts because the driver may then require court appointed counsel.

Disqualifying criteria range from past crimes committed, to outstanding parking tickets as detailed in Section 1011.7 of the Final Form Regulations. PUC regulation 29.505c states that “a common or contract carrier may not permit a person to operate a vehicle in its authorized service when the person was convicted of a felony or misdemeanor under the laws of the

Commonwealth or under the laws of another jurisdiction, **to the extent the conviction relates adversely to that person's suitability to provide service safely and legally**" (emphasis added). The PPA does not base its evaluation on the suitability of the applicant, but on arbitrary standards without any studies to determine if this has any basis for disqualification. Historically, under the PUC's medallion regulations (prior to takeover by the PPA) there had always been separate standards for medallion (30.71-30.77) and non-medallion drivers (29.501-29.509). State law provides different standards. See above.

Under Chapter 29 of the regulations, GCC is able to obtain criminal records and motor vehicle reports in house. Under the proposed regulations we would be forced to comply with the PPA Driver Certification program along with the PUC requirements (29.501-29.509). Unlike the medallion cab drivers during the transition from PUC to PPA regulations, Germantown Cab's drivers would not be grandfathered into the program if these regulations are passed. Therefore, over 300 of our drivers would be treated as new applicants and would need to comply with new driver certification and criminal record requirements. During the time required for them to become compliant they would be unable to operate a vehicle in Philadelphia. Therefore, 300 drivers would be out of work as they seek to become compliant with a new set of standards. If they were to be caught operating vehicles during this time we would be cited for an uncertified driver and the vehicle would be impounded. These costs would undoubtedly put us out of business.

Some of our drivers would be disqualified under these new regulations and may permanently lose their jobs, which would be destructive to their families. The area would be underserved and the public impacted. Whether or not the driver does qualify, he or she has to pay an application fee of \$130. In the specific case of Germantown Cab Company, we have been instructed to pay the fee for the drivers with a "company check or money order." If their criminal record results come back "under review," which is possible if the person has a common name or a criminal record, it can take anywhere from seven to sixty days (the average time is thirty days). Upon receiving PPA approval based on their criminal record standards, he or she then has to attend a four day training course that focuses on teaching the driver to transport passengers at the airport, train stations, and major destinations point to point outside our territory. Therefore the training focuses on ways our drivers can violate Act 94. We would lose an average of \$75 per day per driver for each of the four days of testing. Prior to obtaining a license, he or she would need to go to a doctor and get a physical, which adds the additional expense of a doctor's visit to the already large burden of \$130, travel, and lost time.

These additional financial burdens would discourage new applicants and create the risk that we would lose drivers. This would greatly hurt our operations and our ability to serve our community. This has a greater impact because Germantown has many part-time drivers who work to supplement their incomes. If it is expensive to become a driver or they get rejected for unfounded reasons, they would not even apply.

Cost of Initial Compliance:

PPA Application fee: \$130 x 300 drivers =	39,000
Physical cost: \$50 x 300 drivers =	15,000
Four days' estimated loss of income: (\$7.25 x 32 hours) x (300 drivers) =	69,600
Four days' estimated company loss of income: \$300 x 300 drivers =	90,000
PUC MVR requirement: \$5 x 300 drivers =	1,500
PUC Criminal Record: \$10 x 300 drivers =	3,000
Total Cost of Initial Compliance:	\$218,100

<p>Title 66 § 2409. Driver CERTIFICATION program. (a) General rule.--The commission shall provide for the establishment of a driver licensing CERTIFICATION program for drivers of taxicabs in cities of the first class.</p>	<p>Title 53 §5706 . Driver CERTIFICATION program. (a) General rule.--The authority shall provide for the establishment of a driver licensing CERTIFICATION program for drivers of taxicabs and limousines in cities of the first class.</p>
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The language used in the Medallion Act (Title 66 above) is virtually identical to the language used in Title 53 §5706 with the exception of a change from “commission” to “authority” and the addition of “limousines.” The PPA took over the medallion program which provided training to medallion drivers. The PUC had exempted non- medallion cabs from the certification requirement because the training had to do with the operations of city-wide cabs. Also, it was decided by the PUC (see **Exhibit 1**) that the Medallion Act did not apply to non-medallion cabs. At one point, the PUC cited us for failure to use a certified driver, but later the citation was dismissed based on the fact that we were not required to follow the Medallion Act, even though we operated a taxicab in the city of the first class.

<p>§ 1021.8. Certain training subjects. (b) (1) Authority regulations governing taxicab drivers, including differences between the services medallion taxicabs and partial-rights taxicabs provide.</p>

Our earlier comments to the Parking Authority expressed concern that the training program instructs drivers on how to operate on a city-wide basis in ways that violate territorial restrictions set upon us. The attempt to correct this (as cited above) does not address our concern. The training, if any, must center on issues such as the operation of a partial-rights cab which includes following PUC regulations and a working knowledge of the specific geography of our region (see **Exhibit 2**). The PPA emphasizes issues not of concern to GCC such as the differences between medallion and partial-rights services and focuses on locations and routes that are entirely outside of our rights as can be clearly seen in the “Scenarios” section of the PPA’s Gold Star Training program. There is no reason why GCC cannot perform the function by having its

own training program or provide the drivers with a proper video prepared by PPA. This provides instructions and reduces down time. Drivers who operate less than full time cannot afford four days off to complete a training program. This is especially meaningful when you include longtime GCC drivers who were initially exempt before the PPA takeover.

Questions like those in the following examples appear on the PPA exam. We are including them as illustrations of their inapplicability to our drivers. Not only do our drivers not operate in these areas, but we are also legally forbidden from performing trips of this nature.

- 1) If a passenger wants to go to NYC from the Philadelphia International Airport may he/she negotiate a flat rate?

Note: This would be considered an illegal trip for a non-medallion cab.

- 2) What is the current flag-drop rate for a medallion taxicab?

Note: Germantown Cab Company is not a medallion cab.

- 3) Does a medallion cab have the authority to provide point-to-point service anywhere within Pennsylvania?

Note: While medallion cabs do not have this authority, non-medallion cabs do.

- 4) You pick up three people at the Philadelphia Airport that want to go to the Kimmel Center in Center City Philadelphia, what is the correct fare?

Note: This trip is a violation for operating outside of our rights and is an impoundable offense.

- 5) What bridge should you take to Cherry Hill, New Jersey from the Philadelphia International Airport?

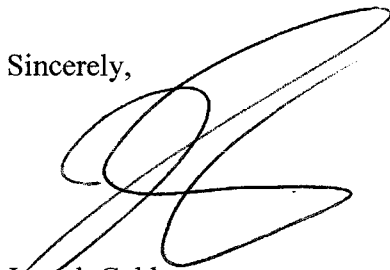
Note: Non-medallion cabs cannot park at PHL, another example of what the Authority would consider operating outside of rights.

- 6) There are two flat rates for Medallion taxicabs. True or false?

Note: Non-medallion drivers do not operate under medallion rates.

For the above reasons we ask IRRC to deny the proposed regulations pertaining to drivers of non-medallion taxicabs. Unlike medallion cab drivers, Germantown Cab's drivers are already subject to annual audits by the PUC. As we have outlined, these proposed PPA regulations are expensive, conflicting, redundant, and potentially damaging to our business, to the livelihoods of our drivers, and to our community.

Sincerely,



Joseph Gabbay
Germantown Cab Company



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

ISSUED: June 26, 1996

IN REPLY PLEASE
REFER TO OUR FILE
A-00107245M9506
G-29

DALIA GABBAY SECRETARY
1314 CHESTNUT STREET
PHILADELPHIA PA 19107

Pennsylvania Public Utility Commission
vs
Philly Cab Company

TO WHOM IT MAY CONCERN:

Enclosed is a copy of an Initial Decision prepared by Administrative Law Judge Isador Kranzel. This Decision is not subject to the filing of exceptions or administrative appeal. In its discretion, the Commission may, within 15 days of issuance of the Decision, exercise its statutory authority to review the Decision. If the Commission does not exercise its authority to review the Decision, it will become final without further Commission action. 66 Pa. C.S. §2405. The parties will be advised by the Commission when the Decision becomes final.

Very truly yours,

John G. Alford
Secretary

Encls.
Certified Mail
Receipt Requested
law

R-10

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	Docket Number
	:	
v.	:	A-00107245M9506
	:	G-29
Philly Cab Company	:	

INITIAL DECISION

Before
ISADOR KRANZEL
Administrative Law Judge

HISTORY OF THE PROCEEDING

On August 28, 1995, the Pennsylvania Public Utility Commission (Commission) issued a Complaint at Docket Number A-00107245M9506 against Respondent, Philly Cab Company, of 1314 Chestnut Street, Philadelphia, PA 19107, alleging that at a road check performed on August 28, 1995 at 6:40 p.m., at 2901 Market Street, Philadelphia, PA, Respondent's black Oldsmobile taxicab bearing Pennsylvania License Number TX25799, G-29, was being operated in violation of §30.76(d)(3) in that the driver was alleged to be uncertified. Subsequent to the filing of the Complaint, Respondent filed an answer on October 10, 1995, which response was sworn by Dalia Gabbay, secretary to Philly Cab Company. The Respondent contended that the driver of the vehicle was one Keith Jones, but that the cab operated was not a medallion taxi but a "G" cab. It further contended that medallion

legislation was not applicable to the operation of the authority of Philly Cab. A request for the dismissal of the Complaint was made.

A hearing was held on January 18, 1996 before Administrative Law Judge Isador Kranzel, at which time Philly Cab was represented by Richard M. Meltzer. Police Officer James Passio, Badge No. 5357, of the Philadelphia Taxi Enforcement Unit, who had conducted the road check, testified that the driver of the vehicle was not certified as required under the Medallion Law. Respondent's attorney advised the court that the issue of applicability of the Medallion Law to Philly Cab Company was then pending before the Pennsylvania Public Utility Commission at Docket Number A-00110733, that the testimony had been closed, and a decision by the Administrative Law Judge was contemplated in the near future. Accordingly, the hearing was postponed by the undersigned Administrative Law Judge until June 3, 1996.

On May 3, 1996, Administrative Law Judge Cynthia Williams Fordham rendered a decision in Docket Number A-00110733 and concluded as a matter of law that Philly Cab was not bound by 66 Pa.C.S. §2401 since Philly Cab does not have city-wide call or demand service.

At the June 3, 1996 hearing, counsel for Respondent asked the Administrative Law Judge to dismiss the Complaint on the basis of the May 3, 1996 decision at Docket Number A-00110733.

FINDINGS OF FACT

1. The Respondent in this proceeding is Philly Cab Company of 1314 Chestnut Street, Philadelphia, Pennsylvania 19107.

2. James Passio is a Philadelphia Police Officer assigned to the Philadelphia Taxi Enforcement Unit.

3. Respondent owns taxicab number G-29, one of 42 non-medallion taxicabs.

4. On August 28, 1995, at 6:40 p.m., at 2901 Market Street, Philadelphia, PA, Respondent's 1979 black Oldsmobile taxicab, bearing Pennsylvania License No. TX25799, G-29, was being operated by one Keith Howard of 1233 N. 29th Street, Philadelphia, PA 19132, also known as Keith Jones, without a Taxi Driver's Certificate.

DISCUSSION

In this case the Commission alleged that Respondent violated the Commission's regulation at 52 Pa. Code §30.76(d)(3) by allowing its taxicab G-29 to be driven by an uncertified driver.

Respondent takes the position that since Respondent is not a medallion cab, it is therefore not required to comply with the rules and regulations of the Medallion Law at 66 Pa.C.S. §2404, et. seq., and therefore, the Complaint must be dismissed as a matter of law.

Respondent bases its position on the May 3, 1996 Initial Decision by Administrative Law Judge Cynthia Williams Fordham in

the matter of Application of Penn Cab Company, Docket Number A-00110733, in which Judge Fordham ruled that the Medallion Law did not apply to Respondent's non-medallion taxicabs.

It is the opinion of the Administrative Law Judge that until the Commission promulgates specific regulations regarding taxi driver certification for operators of non-medallion taxicabs, the failure of an owner of a non-medallion cab to employ only certified drivers is not a violation of the Commission's regulations.

Accordingly, this Complaint must be dismissed since there is no legal requirement for Respondent to comply with the Medallion Law in that regard.

CONCLUSIONS OF LAW

1. The Commission has jurisdiction over the parties and the subject matter in this proceeding by virtue of 66 Pa. C.S. Chapter 24.

2. The Respondent's taxicab G-29 is not subject to 66 Pa.C.S. §2401 since Respondent does not have city-wide call or demand service within the City of Philadelphia.

ORDER

THEREFORE,

IT IS ORDERED:

1. That the Complaint issued by the Commission against Philly Cab Company, Docket Number A-00107245M9506, G-29, is dismissed.
2. That the record in this matter be closed.

Date:

June 17 1996

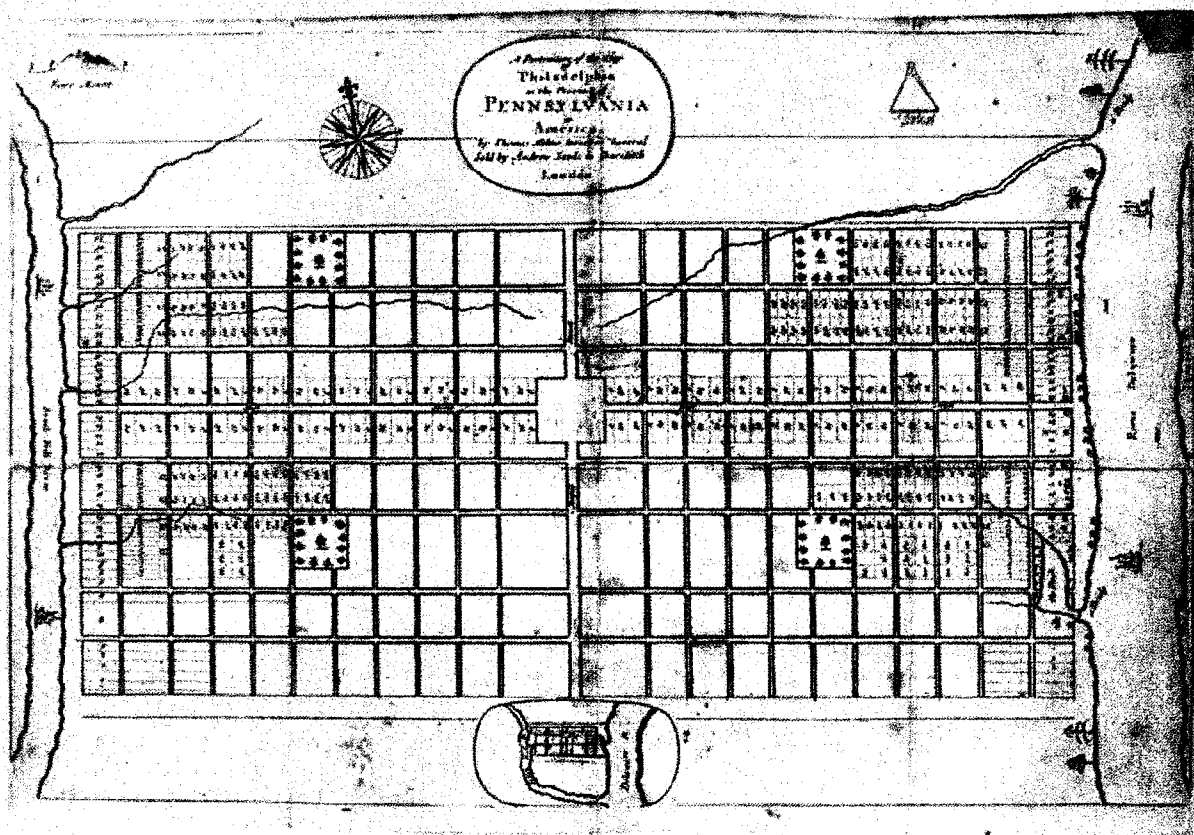
Isador Kranzel

ISADOR KRANZEL
Administrative Law Judge

Exhibit 2

Roads Only a Local Could Love

The purpose of this paper is to illustrate the complications of the Northwest Philadelphia road system. As we have detailed in our public comments, the proposed PPA driver certification program would not serve the needs of our drivers or company. The proposed training focuses on high-traffic tourist destinations that are outside our territory. Germantown Cab Company must employ drivers with local knowledge because newcomers to the area cannot navigate using the grid-based progression of numbered streets as in Center City. Furthermore, our customers prefer to be transported by people with local knowledge because they do not want to run the risk of getting lost if the driver is disoriented. The development of roads in Germantown and the surrounding areas occurred independently from the systematic urban planning of Center City. This separate history makes it essential that we have drivers with unique knowledge of this area and its roadways.



The history of Center City's roads is well documented. Most Philadelphians have heard William Penn's declaration that the city be a "green country towne." In an effort to ensure his vision would become reality, he commissioned a city plan (above) that mapped the roadways between the rivers from Vine Street in the north to South Street in the south. The map above illustrates the logical and orderly nature of the streets. William Penn wanted Philadelphia to rise above the cramped chaos of European streets and he sought to achieve this through planning.

In stark contrast to this centrally planned grid is the development of the outskirts of what was then Philadelphia County, and is now the home of Germantown Cab Company. In the colonial era, Northwest Philadelphia was broken into several townships including Germantown,

Roxborough, and Manayunk. The streets in these townships did not benefit from the logical planning of William Penn. According to Germantown historian Fred Achenbach, the two primary roads that connected Philadelphia and the northwest countryside had originally been Native American trails that were simply taken over by settlers. Development spread haphazardly from these main roads as industry followed the available transportation routes. The disorderly nature of the roads in this area can largely be contributed to the rise of different modes of transportation. For instance, Manayunk sprang up along the Schuylkill River and the subsequent Manayunk canal, which provided transportation, shipping, and power for mills. Water routes were Manayunk's primary links to the outside world, and therefore their streets did not need to extend into the rural areas beyond. The same is true for neighborhoods and roads along the Wissahickon Creek. One of the great windy roads in the city, Lincoln Drive was named Paper Mill Run in the 1800s. Anyone who has ever gotten on Lincoln Drive going the wrong way and had trouble turning around knows that it was obviously not designed with cross streets in mind. This road was intended to be the shipping highway of the time.

After water routes and Native American trails, the next great innovation that would carve up the northwest townships was the railroad. By looking at successive maps through the late 1800's one can see the changes that the railroad brought. The farms and large estates that existed between Germantown Avenue and what is now the Chestnut Hill East railroad line were quickly carved up into smaller sub-developments. These streets rarely meet the existing road (Germantown Avenue) at a right angle, usually jutting out at 30 or 60 degrees off north. One also notices a lack of development to the east of the railroad tracks. The first area to develop near these particular tracks was the land sandwiched between the Avenue and the railway. This contributes to the general lack of continuity that exists on either side of the tracks. A driver may assume that any road on one side of the tracks will pick right up on the other, but this is not true. Development dictated the roadways, not logic or preplanning.



A documentation of every street in northwest Philadelphia that ends only to pick up a few blocks later, or that juts at some illogical angle and heads counter to the angle of the rest of the streets would require more pages than we are presenting here. However, the story of Belfield Avenue, the street where Germantown Cab Company is headquartered, can serve as a helpful

representation. Maps of the old Germantown Township show that what is now the curve of Belfield Avenue was once Wingohocking Creek. The path of the road (as seen in map above) curves at an angle defying all logic as it slices through Germantown and North Philadelphia until it ends at Broad Street. When the creek was confined to an underground sewer pipe, the town simply used the path that was already cleared and ran Belfield Avenue along the old right of way.

A street that runs the length of an old creek path cannot be navigated by logic or general city-wide training. The only way for a driver to know that Belfield Avenue begins as an east-west street and then quickly curves towards Broad Street as it heads southeast is to be familiar with the road system. No amount of knowledge about the Convention Center, Airport, or Center City hotels will help someone navigate in the community we serve. We proudly hire local residents because we are invested in this area and we value the local knowledge that no one else possesses. We hope you will understand the value of this homegrown workforce to our operation and reject the harmful centralized training that PPA has proposed.