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March 10, 2011

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

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Dear Chairman Lutkewitte:

After talking with leaders of the Taxi Worker's Alliance of Pennsylvania and the Pennsylvania Taxi Association, and reflecting on my experience as a consumer of taxi services, I wish to generally endorse the concerns of both the taxicab drivers and the taxicab owners about the new Philadelphia Parking Authority regulations.

First, I worry about the role of the new regulations in maintaining an adequate supply of taxi drivers. The taxi drivers now average less than the minimum wage, and are overwhelmingly composed of immigrants. These regulations would appear to further deplete the number of taxicab drivers.

Specifically requiring vehicles to have less than 15,000 miles upon entry and to be removed from service after 200,000 miles will undermine the precarious economic situation of taxicab drivers and further reduce the limited service now available in the farther reaches of the City of Philadelphia. I believe the test ought to be how well a taxi runs and not how many miles it has when it first enters service and finally is removed from service. I think the eight-year limitation on the age of taxicabs in current law is adequate for public safety purposes.

Similarly, the proposed increase in vehicle insurance also raises the cost of operating cabs beyond the point of economic viability.

Second, the regulations are defective because they are simultaneously overbroad and incomplete. They both cover things that should be left out and fail to cover things that should be included.

In the category of things that should be left out, is the ban on drivers owning their own vehicles. Drivers take pride in the quality of their vehicles, and removing them from driving their own vehicles is not in the interest of maintaining quality taxi service.

Subjects that ought to be covered in the regulations, but are not covered include the fines on taxicab drivers, the ultimate destination of the revenues created by such fines, the need for competition for GPS systems and credit processing, and the need to expand the field of permitted advocates for drivers before the PPA.

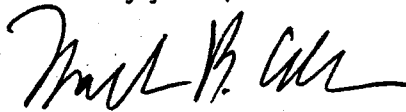
In brief, the taxicab fines should be comparable to those in other cities instead of being among the highest in the nation. The fines should be placed in the Taxicab Fund instead of the overall PPA budget. Drivers should have multiple vendors to choose for both GPS systems and credit card processing systems. Law students and inactive attorneys should be allowed to represent drivers on a volunteer or nominal fee basis before the PPA.

For all these reasons I respectfully request that the new taxicab regulations be rejected and sent back to the drawing board. It is extremely difficult to maintain a functioning taxi service in Philadelphia as has been shown by the various regulatory authorities who have been taxed with this responsibility. I suspect that in the long run taxi cab drivers, no less than bus drivers, subway drivers, train drivers, and paratransit drivers will require some sort of public subsidy to receive adequate compensation and have a fully functioning system.

In any case, given the difficulties of the current situation, these regulations are an inadequate response. They endanger the provision of taxicab service that now exists, and they do all too little to attract new people to this necessary occupation.

Thank you for your attention to these comments.

Sincerely yours,



Mark B. Cohen
Democratic Chairman
Human Services Committee