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HOUSE OF REPRESENTATIVES
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

2885

August 8, 2011

COMMITTEES:

LIQUOR CONTROL, CHAIRMAN
URBAN AFFAIRS, MEMBER

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

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**RE: Final Rulemaking Order (Regulation ID #126-1/IRRC # 2885)
Philadelphia Taxicab and Limousine Regulations**

Dear Chairman Lutkewitte:

I was the prime sponsor of Act 94 of 2004. Act 94 transferred regulatory oversight over Philadelphia's taxicabs and limousines from the Pennsylvania Public Utility Commission to the Philadelphia Parking Authority ("Authority") in 2005. I write to endorse the Authority's final-form regulations and respectfully request that the Independent Regulatory Review Commission ("Commission") approve those regulations at its August 25, 2011 meeting.

Taxicabs and limousines not only provide vital services in densely populated areas like the City of Philadelphia, they also create impressions. When a business traveler or tourist new to Philadelphia steps off of an airplane or out of a hotel door and is greeted by an old, loud, dirty taxicab, limousine or airport transfer vehicle a negative image of this Commonwealth's largest city is instantly created. I noted this concern during debate on the passage of House Bill 2645, which became Act 94. *See Pennsylvania House Legislative Journal*, June 15, 2004, at 1122.

The goal of Act 94 is to develop a clean, safe, reliable, and well regulated taxicab and limousine industry in Philadelphia. 53 Pa.C.S. § 5701.1 (2). Over the past 8 fiscal years the Authority has systematically implemented the goals of Act 94 through orders of its Board and locally promulgated regulations. There has been a clear improvement to taxicab and limousine service in Philadelphia during the Authority's tenure. While I understand the need for the development of these Commonwealth agency regulations, I note that even the court cases that have generated that debate have noted the lack of a challenge in those cases to the substance of the Authority's regulations." *Germantown Cab v. Philadelphia Parking Authority*, 993 A.2d 933, 938 (Pa.Comm. Ct. 2007).

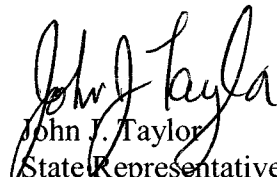
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Chairman
Independent Regulatory Review Commission
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This final-form rulemaking seeks to continue the substance of the Authority's local regulations, which all of the participants in the Philadelphia taxicab and limousine industries have adhered to for 8 years. It is reasonable to believe that the business plans of parties regulated by the Authority presume the continuation of the current regulatory structure. Plans for training, vehicle inspections, insurance, replacement of vehicles and equipment, and so on, are based on the Authority's local regulations. Those local regulations remain valid and will be fully enforceable through the effective date of these final-form regulations.

While the Authority's proposed regulations included several provisions intended to increase the quality of taxicab and limousine service in Philadelphia beyond its current state, those provisions have been removed in response to public comments. I would like to see many of the withdrawn provisions made effective; I understand and commend the Authority for tabling those issues in favor of eliminating the fiscal impact of this important rulemaking. Upon becoming effective, these regulations will form the basis upon which additional improvements may be made with full participation of the public, regulated parties, the standing committees and IRRC.

The City of Philadelphia needs the regulatory stability that these final-form regulations will provide. I urge the IRRC Commissioners to approve the Authority's Final Rulemaking Order.

Sincerely,


John J. Taylor
State Representative
177th Legislative District

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