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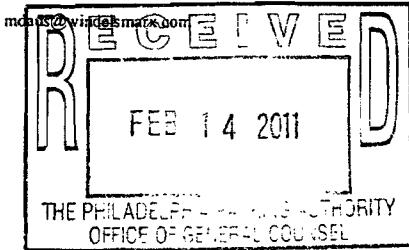
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February 11, 2011

The Philadelphia Parking Authority  
3101 Market Street  
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Philadelphia, PA 19104  
Attn: General Counsel

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To the Honorable Members of the Philadelphia Parking Authority:

I submit this testimony in support of various proposed Philadelphia Parking Authority (PPA) Rules under Title 52, Part II of the Public Utilities Law, in my personal and professional capacity.

I am President of the International Association of Transportation Regulators (IATR), a not-for-profit organization comprised primarily of for-hire ground transportation government regulators from around the world. The IATR shares best practices and works together for common regulatory goals that endeavor to benefit passengers, the ground transportation industry and other stakeholders.

I have served in New York City ("NYC") government for 16 years, 14 of which were at the New York City Taxi and Limousine Commission ("TLC"). I have extensive experience in the government regulation of taxicabs and for-hire vehicles. I served as Commissioner and Chairman of the TLC for eight and one-half (8 1/2) years, where I was the agency's longest serving Chief Executive Officer overseeing 450 employees, a budget of over \$29 million, and annual revenues in excess of \$40 million. I was appointed and reappointed by former New York City Mayor Rudolph W. Giuliani, current Mayor Michael R. Bloomberg, and unanimously approved by the New York City Council. The TLC licenses and regulates the country's largest for-hire ground transportation industry - which includes taxicabs, black cars, community car service vehicles, limousines, paratransits (or ambulettes) and commuter vans. These multi-billion dollar industries transport over one million passengers daily, and the TLC licenses and regulates approximately 100,000 drivers, over 50,000 licensed vehicles and over 900 businesses.

Before serving as TLC Commissioner, I served as the agency's chief legal counsel for five and one-half (5 ½) years: as General Counsel to the Commission and Deputy Commissioner for Legal Affairs beginning in 1998, and before that, as Special Counsel to the TLC Chair – supervising over 75 lawyers and Administrative Law Judges. I have extensive experience in the drafting of TLC regulations, having proposed thousand of rulemakings, and reformed the industry from top-to-bottom, and in almost every subject matter area.

I have returned to the practice of law and consulting and now head the Transportation Practice Group at Windels, Marx, Lane & Mittendorf, LLP, which includes offices in New York City and New Jersey. I practice in the areas of transportation law, administrative law, procurement, litigation, employment and corporate law. For further information about my experience, I refer the PPA to my biography at the following link - <http://www.windelsmarx.com/attorney.asp?key=353>

In addition to my prior experience, I currently serve as a Distinguished Lecturer with the City University of New York's (CUNY's) Transportation Research Center (UTRC) at The City College of New York. The Transportation Research Center is one of ten original University Transportation Centers established in 1987 by the U.S. Congress. These Centers and their faculty members provide a critical link in resolving national and regional transportation problems while training the professionals who address our transportation systems and their customers on a daily basis. It represents the U.S. Department of Transportation's Region II, which includes New York, New Jersey, Puerto Rico and the U.S. Virgin Islands. At City College, I teach graduate courses in Sustainable Transportation, Transportation Policy and For-Hire Transportation Regulation.

I have had the opportunity to review the proposed PPA rules and I would like to offer my support for the proposed changes to Section 1017.3 concerning entry age and vehicle retirement provisions for taxicabs, as well as to Sections 1029.2 and 1029.6 governing the licensure of brokers. I applaud the PPA for these changes that will promote and enhance safety, customer service and the environment, as well as government and industry efficiency and integrity.

I support the PPA's proposal to enhance its vehicle age requirement for taxicabs by reducing the retirement age by which vehicles must be taken out of service from eight (8) to five (5) years, and to introduce for the first time an entry requirement that replaced taxi vehicles be no more than one (1) year old and have vehicle mileage of no more than 15,000 miles. These new rules will ensure that passengers of the City of Philadelphia are serviced with the safest and best quality of vehicles possible.

I can personally attest to the benefits of the NYC vehicle retirement program. In the mid-1990s, the NYC TLC promulgated rules whereby only "new" vehicles can be hacked-up as taxicabs. Also, under this program, individually-owned medallion vehicles must be retired after three (3) years and corporately-owned medallion vehicles that are

double-shifted (24 hours a day) must be taken off-the-road and replaced with new vehicles after five (5) years. Vehicles to be placed into service as taxicabs must be purchased from a licensed dealer or a manufacturer, of the latest model year available from the manufacturer, or of the model year immediately preceding the latest, and must have accumulated fewer than 500 miles traveled at the time of hack-up.

The NYC vehicle retirement program is one of the most significant reforms ever undertaken by the TLC, and it dramatically improved its taxicab fleet to what I firmly believe is the newest, cleanest and most environmentally friendly in the United States and beyond. NYC passengers and residents have enjoyed safer and more aesthetically pleasing vehicles with fewer mechanical breakdowns and lower inspection failure rates. Each model year, manufacturers improve fuel efficiency, emissions and general vehicle comfort and convenience, and NYC's taxicab fleet and the general public has benefited tremendously from our vehicle retirement policies. Not only do newer vehicles emit less harmful pollutants than prior model years, but in recent years, this policy has facilitated the purchase of many alternative fueled vehicles. In the face of rising gasoline prices, many taxicab drivers who own their vehicles have opted to voluntarily purchase more fuel-efficient approved taxicabs to not only increase their net earnings, but also to further help the environment. NYC's vehicle retirement program has provided the opportunity for its taxicab fleet to grow to well over 30% of hybrid-electric vehicles.

Taxicabs in NYC are also inspected for safety and emissions rigorously three times per year. The vehicle retirement rules and inspection processes have been very successful, leading to a decline in vehicle inspection failures. Older taxicabs were phased-out of the NYC fleet by the early 2000s, and thereafter, the vehicle failure rate has declined since 2004 for both initial inspections and re-inspections. This is indicative of safer, higher quality and well maintained taxicabs. Furthermore, customer satisfaction with taxicab service has increased overall in NYC. Passenger satisfaction is a crucial element of a healthy taxicab system as it has had a positive impact not only on domestic ridership for NYC residents, but also for tourists and business travelers, to whom the taxicab driver and the quality of the vehicle are the first and last faces and impressions encountered upon their departure and arrival.

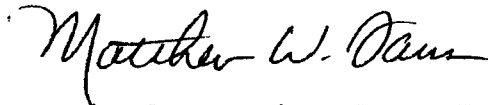
Unfortunately, as a result of NYC TLC's vehicle retirement program, many taxicabs taken off the road and placed out-of-service in our City ended-up being brought into service as used vehicles in Philadelphia under the current regulations. Philadelphia deserves better and should not be using old NYC vehicles! I have no doubt that the taxicab industry in Philadelphia will prosper under its new vehicle retirement and entry rules, and I believe the great city of Philadelphia, like New York, deserves the safest, best quality and most environmentally-friendly vehicles.

I am also supportive of the efforts of the PPA to certify and license medallion and limousine rights brokers. New York City also has rules that license medallion brokers. However, PPA's new proposal under Section 1029.6 to require the completion of a training course and a test for certification is a reform which goes further than NYC's

system. I applaud these efforts to increase the competency and enhance the integrity of brokers, to ensure that proper and fair transactions are efficiently administered.

These and other reforms passed by the PPA not only follow the lead of NYC's leading taxicab system, but they are in many instances surpassing and setting new standards for best practices in various areas. I fully encourage and support my colleagues, and fully support those proposed rules referenced herein. If the PPA would like any further information or comments from me, I can be reached at the above-referenced address, email and telephone numbers.

Sincerely,

A handwritten signature in black ink that reads "Matthew W. Daus". The signature is written in a cursive style with a large initial 'M' and a long, sweeping underline.

Professor Matthew W. Daus, Esq.