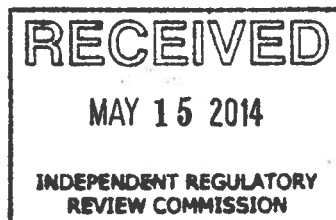


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Cooper, Kathy

From: INNA <innafriedmancpa@hotmail.com>
Sent: Thursday, May 15, 2014 12:40 PM
To: Dennis Weldon; vfenerty@philapark.org; IRRRC; kgillesp@pahousegop.com; rtomlinson@pasen.gov; ronraymond@crisciassociates.com; nickamiccarelli@gmail.com; Michael Henry
Subject: Final Rulemaking: 126-5 126-6 Wheelchair Accessible taxicabs and Public Auction

Mr. Dennis Weldon JR,
General Counsel, Philadelphia Parking Authority



Dear Dennis,

I have very important questions that need to be answered regarding the auction of WAV medallions and the recently released final regulations:

1. As you mention in your regulations, non-medallion owners have to file SA-1 with PPA. When will a potential bidder's application be published in the Bulletin, before or after the auction begins?
2. If it is published before the auction begins and a protest is subsequently filed, when will the potential bidder be able to participate in the auction-before or after all protests are cleared?
3. Do potential bidders who are required to file SA-1 prior to the auction have to pay an application fee (non-refundable) or you will the PPA review an application for free? If any amount, what is the amount to be paid?
4. As I understand the regulations, current medallion owners do not have to file SA-1 prior to the auction, only after in order to complete the transfer. If existing medallion owners submit applications to the PPA after the auction is held, what happens with the substantial deposits and application fees submitted to PPA with their bids if a protest is filed? (Estimated amount is \$2,500,000). Will money be kept in escrow? Will the bidder have the option to withdraw his/her Bid if a protest is filed? I do not see any explanation of the above in the regulations.
5. Does the PPA intend to issue a warning to potential bidders that even if they qualify under the regulations, protests may be filed against them and they will not be able to get title to the property they purchased, their substantial deposit will be held somewhere not specified by the regulations and that they may incur huge legal fees trying either to get a title to the property or their deposit back? In light of the fact that currently every application for medallion transfers in Philadelphia is being protested by the same group of people, such disclosure seems to be appropriate.
6. Is the handicapped community aware that protests may be filed and that WAVs may not go into service for a very long time?

7. Are you aware of the fact that there are no direct medallion (financial institutions) lenders in Philadelphia and that anyone applying for a loan must go through a broker? If you require an 80% guarantee letter from a lender, the broker will be aware of the proposed bid, rendering the confidentiality of the sealed bid process moot.

8. Are you aware of the fact that there have been no closings on medallion sales in Philadelphia since January of 2014. Financial institutions are reluctant to lend money or issue any commitments in Philadelphia due to the **current protests filed against each and every medallion sale**. Since protests halted all sales, there is no verified current market value of the medallions in Philadelphia. Is it a reasonable to hold an auction under current conditions when the issue of the protests is not settled?

9. Are you aware that a lot of **potential bidders are scared** to bid because of the protests and may not participate in the auction until this matter is resolved?

The regulations fail to address a lot of important issues. Please specify the application process for all bidders, both for non medallion owners and for current medallion owners. In particular:

-when exactly does form SA-1 need to be filed?

-what fees have to be paid and when? (currently fees are 3% of the selling price). If SA-1 has to be filed before a bid, what fees have to be submitted?

-at what point in time will the application will be published in the PA Bulletin and will such an announcement specify the time frame for the filing of the Protest?

-what happens with the deposit and application fees if a protest is filed?

Please get back to me with a response as soon as possible. Timing is important because of the scheduled Public meeting.

Thank you,

Inna Friedman

Pennsylvania Taxi Assoc., Inc.