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Taxi Workers Alliance of Pennsylvania

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December 9, 2013

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

Philadelphia Parking Authority
c/o Mr. Dennis Weldon – Chief Counsel
3101 Market Street
Philadelphia, Pa. 19104

Re: PPA Regulation # 126-6: Sale of Medallion by the Authority

On behalf of the Taxi Workers Alliance of Pennsylvania and our 1,200 driver membership in the city of Philadelphia, we would like to submit comments concerning the sale of medallion regulations introduced by the Philadelphia Parking Authority. We have several serious concerns with this regulation and believe it will have an adverse effect on taxicab drivers' income with no compensation. It is our hope that these issues are carefully vetted and rectified. Our concerns are as follow:

1. The ability for taxi drivers to participate in the auction of these new wheelchair accessible medallions has been eliminated through these regulations. Only a current medallion owner can make an official bid. The price of these new medallions should sale for a lower market value than the current medallions in Philadelphia. Because the price is lowered, more taxi drivers will be able to fulfill their dreams of one day owning their very own medallion. The Authority seeks to take this dream away. Not only drivers, but anyone that is financially able, of good character, and have a vested interest in the industry should be able to offer an official bid during the auction.
2. The Auction should be a transparent process and all offers and bidders should do so in an open manner. The Taxi Workers Alliance of Pennsylvania is totally against the closed bid process that the Authority seeks in its regulations. During the 2000 Republican National Convention, 165 taxi medallions were auctioned in a closed bid process. The bidders colluded during the process in order to guarantee that they would be successful in the auction. Other cities are realizing the corruption involved when taxi medallions are auctioned in a closed bid process.

3. The number of new wheelchair accessible medallions should be auctioned all at once. 15 per year over a ten year period do not serve the public good. We are asking the Authority to use the power given it by the State Legislators to increase this number.
4. The revenue received from the sale of these new wheelchair accessible medallions should be used to fund special needs students in Philadelphia Public Schools. The Authority's Taxi and Limousine Division has a budget of \$5-6 million dollars per year. Each year there is always a surplus, not a deficit in the Taxi and Limousine Division. There is a greater need among the children in Philadelphia Public School system for this windfall of capital
5. The revenue received from the sale of these new wheelchair accessible medallions should be used to fund a taxi drivers' relief fund for drivers and their families when drivers are assaulted, injured, or killed on the job. Since drivers' income will be reduced by 9.37% with the addition of 150 new medallions, they should be compensated for these lost wages. 150 new medallions is a 9.37% increase to the total taxi fleet. Each driver can expect to see that 9.37% deduction in their earnings. This taking by the Authority should be compensated in other ways to the drivers. According to a 2010 report by the U.S. Department of Labor; taxi drivers are listed in the top 10 dangerous occupations. This fact is well acknowledged by the Authority, who this year has began to amend their regulations to include cameras in taxis, panic buttons link to police, trouble lights installed on the back of cabs, and signage about mandatory sentencing for assaulting, robbing, or murdering drivers. Since drivers are not covered by workers compensations, disability insurance, or even the taxi motor-vehicle insurance; the State/Authority has to be responsible for the safety of these drivers while they are forced to service every Pennsylvanians.

Respectfully submitted,


Ronald Blount - President