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## Taxi Workers Alliance of Pennsylvania

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February 6, 2014

The Honorable Silvan B. Lutkewitt III  
Chairman  
Independent Regulatory Review  
Commission 333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Re: Docket No. 126-7 Proposed Rulemaking  
Philadelphia Taxicab & Limousine Regulations  
52 Pa. Code Part II  
Taxicab Emergency Lights

Dear Chairman Lutkewitt:

The Taxi Workers Alliance of Pennsylvania (TWA-PA), fully support the Philadelphia Parking Authority regulatory changes to include taxicab emergency lights. The epidemic of violence against taxicab drivers also has an equally negative impact on the hospitality image of Philadelphia. It becomes a question of whether it's safe to drive or travel in a Philadelphia taxicab. This is one of those rare times where all stakeholders in the taxi industry agree; the taxi industry needs more safety precautions.

New York City has required both a partition shield and trouble light on all medallion taxicabs for quite some time. Los Angeles also uses cameras in their taxicabs to deter violence against drivers. As you may, the U.S. Department of Labor lists taxi drivers into the top ten (10) dangerous occupations. While adding trouble lights onto taxicabs in this regulation may conflict with current Pennsylvania motor vehicle laws, we believe that this proposed form allows the Authority time to make adjustments that will be in compliance with State law. This is a good regulation and we should not throw the baby out with the bath water. TWA-PA would recommend that the Authority establish a working group, including the Pennsylvania State police department, in finding ways of bring this regulation into compliance.

While adding a trouble light onto taxicabs would help reduce crimes against drivers, we believe that this proposed regulatory change could be more inclusive by mandating a camera system in all cabs, signs posted in taxicabs stating: "it's a crime to assault or injure drivers", and a fund setup by stakeholders to help drivers and their families when they are injured, assaulted, or killed on the job. Lastly for a holistic solution for drivers' safety, the vehicle's insurance must cover the driver.

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Many drivers are injured in accidents thru no fault of their own and are left to fend for themselves. Eighty-five percent of Philadelphia taxi drivers have no health insurance; none are covered with any workers compensation or disability insurance. This forces too many drivers to return to work after an injury before they are well. This places the public at risk because these drivers are not performing at top capacity.

TWA-PA applauds the Authority with this effort to protect Philadelphia medallion taxicab drivers. However, this is a very complicated issue that will require all stakeholders' attention. While installing a trouble light is a good first step, we believe that a more in-depth effort is needed to cure this epidemic. At present, customers are playing roulette when entering a Philadelphia taxicab and drivers don't know if they'll come home at the end of their shift. This is a spooky way to do business.

Respectfully submitted:

  
Ronald Blount - President