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Taxi Workers Alliance of Pennsylvania

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July 21, 2014

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

Re: PPA Security Cameras Regulation # 126-8 (IRRC# 2943) – Final Form

On behalf of the 1,200 driver members of the Taxi Workers Alliance of Pennsylvania (TWA-PA), we wish to submit comments on the PPA Final Form Regulations #126-8. While our members are deeply appreciative of the purpose and goal of this regulation, we feel that there are still some issues that have not been address that will prevent difficulties and added expense to drivers. We believe that the Authority unintentionally will be creating an Anti-Trust environment between medallion owners/dispatchers and drivers. This atmosphere will force drivers to pay more to lease the medallion cab, pay more for dispatch fees, and give greater control to the GPS/Credit Card vendors by connecting the security cameras directly to the meter. At a time when LYFT, UberX, and other are seeking to compete with the taxi industry directly, this regulation ‘as is’, will force many drivers to turn in their medallion taxi keys for any of these less oppressive rideshare startups.

- The Authority has only given two (2) possible vendors to provide security camera service for the industry, despite their claim that drivers and medallion owners can pick a vendor of their own choosing. The impression the Authority gives is like interchanging a mouse or key board on a computer system, or a tire and battery on a vehicle. This would be our idea of an open market. The Authority needs to provide a more comprehensive list of possible security camera vendors as well as clear examples of how the meter system will be universal.
- The Authority estimates that there will be maintenance charges as well as additional mobile data fees associated with the camera system. Since this is the case, why can't the industry use their own maintenance and mobile data system, independent of VTS and CMT. The Authority argues that by connecting directly to the meter that dispatchers, enforcement officers, and others would get real time access to the video, the same results could happen in an independent system. What happens when the VTS or CMT system goes down for a number of reasons, as has happened numerous times in the past? The camera would be down as well, unlike with an independent system that will keep drivers safe.

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- The largest fleet and Dispatch Company in Philadelphia have begun telling drivers that they will have to pay more in dispatch fees once the cameras are installed. This dispatch company plans to buy the cameras and charge drivers substantially more in dispatch fees.

They expect to recoup their upfront monies for the cameras within a year, but the increase dispatch fees will continue. Drivers will have no choice since it is the medallion owners who will be responsible for the cost of the cameras. The medallion owners will simply elect to get the free camera because they do not pay dispatch fees – only drivers. This situation is the old “bait and switch”, where they hold the poor driver up to the public and says “his/her working conditions are unsafe and they need better security”, and then switch the situation to create more profit from the drivers. A solution to this possible exploitation is for the Authority to create regulations that there is some sort of installation payment for the pre-paid cameras. No one should receive indefinite residuals for a regulation that suppose to provide better drivers and customers safety.

- Lastly, the Authority further argues that the cameras should connect to the meter because of the GPS technology and distress button that are already connected. Last summer, driver Hafiz Safaraz was shot and killed while the bad guy stood outside of the vehicle. There was no distress button or GPS location notice given to the dispatcher. Moreover, the GPS doesn't update in real-time, but in 5 to 10 minute intervals. A couple of years ago, a driver had a shotgun to his head, he hit the distress button at 30th and Walnut streets, by the time the dispatcher responded, he was at the Airport off-ramp on Route 76 East (5–6 miles away). The dispatcher monitor showed him still at 30th and Walnut street. In order to get real-time data, the GPS vendor would need to increase mobile fees. The point is that an independent system from the meter would have real-time capabilities as well as dispatcher access. The largest dispatching company has over 400 medallion cabs fighting for work, the radio is constantly jammed with activities. Drivers would be playing roulette with their lives in hopes that a dispatcher is completely focused on an emergency.

If this Authority regulation pass “as is”, drivers income will diminish, cameras will be 50% less effective due to system breakdown and dispatchers distractions, and the intended purpose of providing drivers and customers safety will not be achieved. This regulatory change is needed in a city such as Philadelphia. Drivers and customers would both benefit knowing that this form of transportation is safe, secure, and dependable. If the Authority were to adhere to our recommendations, this could be a win-win regulation for the taxi industry as a whole.

Respectfully submitted;



Ronald Blount- President