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Taxi Workers Alliance of Pennsylvania

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April 25, 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)

On behalf of the 1,200 driver members of the Taxi Workers Alliance of Pennsylvania (TWA-PA), we wish to submit our comments on the PPA-TLD security camera regulation submitted to the Independent Regulatory Review Commission #126-8. TWA-PA strongly supports this regulation and the recently PPA-TLD withdrawn regulation #126-7, regarding installed trouble lights. According to a 2010 report released by the U.S. Department of Labor, taxi drivers are listed in the top ten (10) dangerous occupations. Taxi drivers in Philadelphia have no disability, health, or workers' compensation coverage. They are also excluded on the vehicle's insurance policy, leaving them and their families to fend for themselves in the event of assault or death due to homicide. Drivers are unable to afford coverage while earning under \$5.00 per hour according to a report released by the PPA-TLD. In order for drivers to effectively participate in the Hospitality vitality of Philadelphia, there must be some safety measures in place to protect them.

TWA-PA has submitted a list of safety measures to the PPA-TLD that we strongly feel would have reduced violence against drivers that included:

- Security Cameras
- Trouble light on rear of taxicabs
- Panic button linked to police instead of dispatchers
- Signage in customer compartment highlighting mandatory sentencing for assault and robbery of drivers
- The creation of a taxi drivers relief fund

The PPA Board voted and approved all of these initiatives besides the relief fund. The PPA-TLD was tasked with moving forward with these safety measures. Drivers on their part held prayer vigils, demonstrations, and work stoppages to express their concerns over their safety. The National Institute for Occupational Safety and Health (NIOSH) released a finding that when both safety partitions and cameras are used conjunctively, violence against drivers drops significantly.

This regulation is neither innovative nor intrusive, as other cities including Las Vegas, Los Angeles, Seattle, Chicago, New York, and many more have installed security cameras in taxis. In Pennsylvania, a taxicab is considered a public utility strictly for public use, such as SEPTA, schools, police and fire departments, all of which use some form of video recording device.

Furthermore, taxicabs in Philadelphia are already equipped with GPS tracking, 2-way radios, and public TV advertising screens in this very public space. These GPS records for instance, are accessible to the PPA-TLD, taxi owners, dispatchers and drivers. Anyone could trace another person's movement within this system.

Taxi driving is a very isolated job. People will travel to dark locations, back street alleys, and other dangerous locations. While it is true that security cameras will not stop a crime; they will in many cases catch the perpetrator. The apprehension of the criminal in itself is a form of deterrent for others who may see drivers as an easy mark. Between the partition shield and security cameras, Philadelphia taxi drivers and their families will better serve the city, knowing that there's some form of work protection. A good security system for drivers should include both preventive measures and if that fail, a way of apprehending the bad guys. Hafaz Safaraz was a Philadelphia driver killed in May 2013, on a quiet street on the West side. He had a partition shield in is cab. The person who murdered Hafaz knew that there was no one witnessing this crime. If this person knew that his picture would be public, maybe Hafaz would be alive today.

Our concern with PPA-TLD regulation 126-8 is the connection of the system to the meter. There are only two (2) meter vendors in Philadelphia and this regulation will create an anti-trust violation. We see no need to connect the camera to the meter. What if a robber attacks a driver before he could react? There have been several incidents of dispatchers failing to respond to the panic button, a main reason why drivers want the panic button linked to police. There is a turf war going on in Philadelphia, where several taxi medallion owners are trying to consolidate the industry regarding leasing to drivers, dispatching, insurance, credit card processing, and now security cameras. These greedy taxi owners overcharge drivers to lease the cabs, force them to join their dispatch companies, force them to buy the vehicles from them at high interests' rates, hold their credit card money until they feel like releasing it, charge extreme insurance surcharges for accidents that happened over a year ago, and many other exploitative maneuvers. The PPA-TLD has been unable to stop these abuses and connecting the cameras to the meter will give these owners another avenue to cheat drivers. The goal is to protect drivers, not forcing drivers to buy cameras from only a handful of individuals.

Lastly, the Pennsylvania legislators created the medallion system so that medallion owners could reinvest into the industry. § 5712. Medallion system –“ There is a medallion system within cities of the first class in order to provide holders of certificates of public convenience which authorize citywide call or demand service the opportunity to upgrade and improve the operations of taxicabs.” TWA-PA position is that the cost of the security cameras should be borne by the medallion owners. They must invest somehow into drivers' safety since they have reaped most of the profits.

Respectfully submitted;



Ronald Blount - President

Homicide Rates for Taxi Drivers Drop When Security Cameras Are Installed

The role of taxicab security equipment – such as cameras – in preventing driver homicides is examined in a new study from NIOSH.

Jun 13, 2013 Sandy Smith

Taxi cab drivers face a high risk of being the victim of workplace homicide. While many cities and companies have made efforts to improve taxicab driver safety through the use of security equipment, such as in-vehicle cameras and partitions, the research into the effectiveness of these efforts has been limited.

A new study from the National Institute for Occupational Safety and Health (NIOSH) examines the effectiveness of specific safety equipment in reducing murder rates among taxi drivers. Published by the American Journal of Preventive Medicine, the study found that the installation of in-vehicle security cameras resulted in a significant drop in the rate of driver homicides.

The study was conducted by NIOSH researchers in the Division of Safety Research and looked at the effectiveness of security cameras and partitions installed in taxicabs. Examining newspaper clippings from a 15-year period in 26 cities, the researchers sorted the cities by:

1. Use of security cameras.
2. Use of partitions.
3. Cities without either security intervention, as a control.

The results showed that cities that installed the cameras experienced a significant decrease in their homicide rate; seven times lower from pre-installation of the cameras. They also found that camera cities had a homicide rate three times lower than cities without cameras or security partitions.

“We have data that can show us who is at risk for workplace violence, but for taxi drivers there was a gap in knowledge on how effective the security equipment was at keeping them safe,” said Dawn Castillo, director of NIOSH’s Division of Safety Research. “This study provides an important piece of that puzzle, helping to increase our understanding of what works in preventing these types of tragic incidents. We hope that this will help cities and taxicab companies in their effort to make the workplace safer for these drivers.”

This study only examined news clippings and further research is still needed to better understand the issue and how to best prevent workplace homicides. Future research is planned to interview taxicab drivers to further compare the effect of security equipment in preventing more common types of workplace violence faced by taxi drivers, such as threats and assaults. The complete study is available on the American Journal of Preventive Medicine web site.