

3058

From: James Dube [<mailto:jamesedube119@gmail.com>]

Sent: Monday, September 01, 2014 9:04 PM

To: Johnson, Leslie A. Lewis

Subject: Re: IRRRC's website

I am disputing the Regulatory Analysis Form requesting to eliminate the term "expired" within 52 Pa.Code 1001.43, 1011.3, 1011.4, 1051.3 & 1051.4 by the Philadelphia Parking Authority (PPA) (IRRC #3058) for the following reasons:

1. The Regulatory Analysis Form was not completed accurately nor completely.
2. A license requires specific regulatory parameters including expiration periods, requirements for use of license, requirements for the user to qualify to be a user of the license, amounts of fees, violations that can be imposed, Government entities issue a license for purposes to require standards for the permission to carry on or be able to perform certain services or privileges which is issued on the basis of public safety or health and for the benefits of the citizens/the people.
3. Licenses are assigned to a specific person or business entity and may be transferable with instances not involving identity or privacy and with a party that will continue to comply with the requirements but can not be sold for a monetary value.
4. The term "expired" is not confusing and is only causing an issue in that the administrative regulations are insufficient to maintain a license of such as a certificate of convenience and/or it is in strict violation of federal standards of law, civil right violations of the citizens paying the taxes used to maintain the licenses and certificates, violations of the State Model Administration Act and a corrupt and manipulating interpretation of the intent of Chapter 11 Title 66 in reference to a certificate of convenience.
5. Title 75 clearly uses multiple statements with definitions that are clear and concise in the regulating of a driver's license such as expired, revoked, renewal, reinstate and in the use and process of regulating driver's licenses.

Therefore the change to this legislative/administrative regulation in in violation of the supremacy clause due to the conflict of this being a

legislative, judicial and administrative basis according to your commission and interferes with commerce an a manipulation of the currency in relation

to the use of medallions/coins. Any change to remove the term "expired" is a clear violation of the citizens of the City of Philadelphia's due process rights.

You can not sell a right and you can only assign a privilege and any sale of either on in relation to securities or a manipulation of our economy or monetary system is treason.

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