

# Comments of the Independent Regulatory Review Commission



## Philadelphia Parking Authority Regulation #126-9 (IRRC #3058)

### Annual Filing Requirements

July 9, 2014

We submit for your consideration the following comments on the proposed rulemaking published in the May 10, 2014 *Pennsylvania Bulletin*. Our comments are based on criteria in Section 5.2 of the Regulatory Review Act (71 P.S. § 745.5b). Section 5.1(a) of the Regulatory Review Act (71 P.S. § 745.5a(a)) directs the Philadelphia Parking Authority to respond to all comments received from us or any other source.

#### **1. Section 1011.4. Annual assessments and renewal fees. – Clarity.**

As amended, Subsection 1011.4(b) no longer provides a specific timeframe to pay assessments, but rather refers the reader to 53 Pa.C.S. Chapters 55 and 57 (act). We note that subsection (c) provides for payment “the 15th day from notice,” along with the reference to the act. Both provisions reference § 5707.1(a) of the act, which states, in part, that “an assessment must be paid within 30 days of service.” We recommend a review of both Subsections (b) and (c) to make them consistent with § 5707.1(a) of the act and to include specific timeframes to pay assessments in the regulation.

#### **2. Section 1051.3. Annual rights renewal process. – Clarity.**

Proposed Paragraph 1051.3(g)(6) uses the word “taxicab.” Should this word be “limousine”?

#### **3. Section 1051.4. Annual assessments and renewal fees. – Clarity.**

The cross-reference in proposed Subsection 1051.4(c) is to Paragraph 1051.3(c)(4), but in our review we could not find this paragraph. Was the intent to cross-reference Paragraph 1051.3(c)(3)?