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INDEPENDENT REGULATORY  
REVIEW COMMISSION  
2015 JUL -2 AM 11:15**Regulatory Analysis Form**

(Completed by Promulgating Agency)

(All Comments submitted on this regulation will appear on IRRC's website)

(1) Agency: Philadelphia Parking Authority

(2) Agency Number: 126

Identification Number: 10

IRRC Number: 3081

(3) PA Code Cite: 52 Pa. Code §§ 1017.78 (relating to use of captured images), 1021.12 (relating to additional requirements).

(4) Short Title: Image Retention and Use.

(5) Agency Contacts (List Telephone Number and Email Address):

Primary Contact: Dennis Weldon, General Counsel, at PRM101@philapark.org, 215-683-9630 (FAX: 215-683-9619), 701 Market Street, Suite 5400, Philadelphia, PA 19106.

Secondary Contact: James R. Ney, Director, Taxicab and Limousine Division at jney@philapark.org, 215-683-6417 (FAX: 215-683-9437), 2415 South Swanson Street, Philadelphia PA 19148.

(6) Type of Rulemaking (check applicable box):

- ☐ Proposed Regulation  
☒ Final Regulation  
☐ Final Omitted Regulation

- ☐ Emergency Certification Regulation;  
☐ Certification by the Governor  
☐ Certification by the Attorney General

(7) Briefly explain the regulation in clear and nontechnical language. (100 words or less)

The final regulation establishes requirements related to the limited retention and use of taxicab safety cameras images, and will prohibit the unnecessary activation of the taxicab distress button. The regulation anticipates the elimination of the transmission of images to a taxicab dispatcher provided for in Proposed regulation 126-12. The regulation will limit the reasons that images may be accessed on each taxicabs local storage device and provides for limitations as to the maintenance of such images.

(8) State the statutory authority for the regulation. Include specific statutory citation.

Sections 13 and 17 of the act of July 16, 2004, (P.L. 758, No. 94), *as amended*, 53 Pa.C.S. §§5701 *et seq.*, §§ § 5714 (a) and (b), 5722 and 5742; section 5505(d) of the Parking Authorities Act, act of June 19, 2001, (P.L. 287, No. 22), *as amended*, 53 Pa. C.S. §§ 5505(d) (23) and (24) .

(9) Is the regulation mandated by any federal or state law or court order, or federal regulation? Are there any relevant state or federal court decisions? If yes, cite the specific law, case or regulation as well as, any deadlines for action. No.

(10) State why the regulation is needed. Explain the compelling public interest that justifies the regulation. Describe who will benefit from the regulation. Quantify the benefits as completely as possible and approximate the number of people who will benefit.

We incorporate our response provided in No 7. The regulation is needed in order to permit the proper use of captured images by law enforcement or regulatory enforcement purposes. The regulation will also prohibit the misuse of these images and provide a clear timeline during which the images must be

securely maintained and then deleted.
(11) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulations. No.
(12) How does this regulation compare with those of the other states? How will this affect Pennsylvania's ability to compete with other states?  The proposed regulation will work in conjunction with the Authority's regulation implementing the taxicab safety cameras by providing needed guidance on the manner in which images must be retained, used and deleted. The regulation also specifically restricts the use of the emergency distress button in taxicabs to situations in which emergency responders are necessary. Pennsylvania's ability to compete with other states will not be impacted.
(13) Will the regulation affect any other regulations of the promulgating agency or other state agencies? No. We incorporate our response provided in No 12.
(14) Describe the communications with and solicitation of input from the public, any advisory council/group, small businesses and groups representing small businesses in the development and drafting of the regulation. List the specific persons and/or groups who were involved. ("Small business" is defined in Section 3 of the Regulatory Review Act, Act 76 of 2012.)  There were no communications of this nature related to the proposed regulation.
(15) Identify the types and number of persons, businesses, small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012) and organizations which will be affected by the regulation. How are they affected? The Authority approximates that those affected by the regulation will be: Drivers: approximately 4,000 drivers all of whom are individuals. Owners: 713 taxicab medallion owners and 6 partial-rights carriers, each of which is a small business. Dispatchers: 10, each of which is a small business.  No impact is anticipated at all. The regulation merely establishes necessary procedures for functions already performed by the Authority.
(16) List the persons, groups or entities, including small businesses that will be required to comply with the regulation. Approximate the number that will be required to comply.  We have provided this number in response to No. 15, which we incorporate here.
(17) Identify the financial, economic and social impact of the regulation on individuals, small businesses, businesses and labor communities and other public and private organizations. Evaluate the benefits expected as a result of the regulation.  The regulation complements the existing safety camera regulation and will remove uncertainty associated with the manner in which images should be retained, secured and used. The images will be accessible only by the Authority and will not directly impact the regulated community or the public at all. This regulation places a limitation on how long the images must be retained.
(18) Explain how the benefits of the regulation outweigh any cost and adverse effects.  We incorporate our response provided in No. 17. We anticipate no additional costs or adverse effects.
(19) Provide a specific estimate of the costs and/or savings to the <b>regulated community</b> associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain

how the dollar estimates were derived. None.

(20) Provide a specific estimate of the costs and/or savings to the **local governments** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived. None.

(21) Provide a specific estimate of the costs and/or savings to the **state government** associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required. Explain how the dollar estimates were derived. None.

(22) For each of the groups and entities identified in items (19)-(21) above, submit a statement of legal, accounting or consulting procedures and additional reporting, recordkeeping or other paperwork, including copies of forms or reports, which will be required for implementation of the regulation and an explanation of measures which have been taken to minimize these requirements. None.

(23) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	<b>Current FY Year</b>	<b>FY +1 Year</b>	<b>FY +2 Year</b>	<b>FY +3 Year</b>	<b>FY +4 Year</b>	<b>FY +5 Year</b>
<b>SAVINGS:</b>	<b>\$0.00</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>
<b>Regulated Community</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>
<b>Local Government</b>						
<b>State Government(PPA)</b>						
<b>Total Savings</b>						
<b>COSTS:</b>						
<b>Regulated Community</b>						
<b>Local Government</b>						
<b>State Government</b>						
<b>Total Costs</b>						
<b>REVENUE LOSSES:</b>						
<b>Regulated Community</b>						
<b>Local Government</b>						
<b>State Government</b>						
<b>Total Revenue Losses</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>

(23a) Provide the past three year expenditure history for programs affected by the regulation.

<b>Program</b>	<b>FY -3</b>	<b>FY -2</b>	<b>FY -1</b>	<b>Current FY</b>
N/A.	n/a	n/a	n/a	n/a

(24) For any regulation that may have an adverse impact on small businesses (as defined in Section 3 of

the Regulatory Review Act, Act 76 of 2012), provide an economic impact statement that includes the following:

(a) An identification and estimate of the number of small businesses subject to the regulation.

N/A

(b) The projected reporting, recordkeeping and other administrative costs required for compliance with the proposed regulation, including the type of professional skills necessary for preparation of the report or record.

N/A

(c) A statement of probable effect on impacted small businesses.

N/A

(d) A description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation.

N/A

(25) List any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, the elderly, small businesses, and farmers.

None.

(26) Include a description of any alternative regulatory provisions which have been considered and rejected and a statement that the least burdensome acceptable alternative has been selected.

No other alternatives were considered.

(27) In conducting a regulatory flexibility analysis, explain whether regulatory methods were considered that will minimize any adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), including:

a) The establishment of less stringent compliance or reporting requirements for small businesses; N/A

b) The establishment of less stringent schedules or deadlines for compliance or reporting requirements for small businesses; N/A

c) The consolidation or simplification of compliance or reporting requirements for small businesses; N/A

d) The establishment of performing standards for small businesses to replace design or operational standards required in the regulation; N/A

e) The exemption of small businesses from all or any part of the requirements contained in the regulation. N/A. We incorporate our response to question No. 18.

(28) If data is the basis for this regulation, please provide a description of the data, explain in detail how the data was obtained, and how it meets the acceptability standard for empirical, replicable and testable data that is supported by documentation, statistics, reports, studies or research. Please submit data or supporting materials with the regulatory package. If the material exceeds 50 pages, please provide it in a searchable electronic format or provide a list of citations and internet links that, where possible, can be accessed in a searchable format in lieu of the actual material. If other data was considered but not used, please explain why that data was determined not to be acceptable. No data was necessary.

(29) Include a schedule for review of the regulation including:

A. The date by which the agency must receive public comments:	30 days after publication in <i>Pa. B</i>
B. The date or dates on which public meetings or hearings will be held:	N/A
C. The expected date of promulgation of the proposed regulation as a final-form regulation:	3 <sup>st</sup> Quarter 2015
D. The expected effective date of the final-form regulation:	4 <sup>th</sup> Quarter 2015
E. The date by which compliance with the final-form regulation will be required:	Upon publication in <i>Pa. B</i>
F. The date by which required permits, licenses or other approvals must be obtained:	N/A
(30) Describe the plan developed for evaluating the continuing effectiveness of the regulations after its implementation. The Authority will continually analyze the impact of this regulation.	

**FACE SHEET  
FOR FILING DOCUMENTS  
WITH THE LEGISLATIVE REFERENCE BUREAU**

**(Pursuant to Commonwealth Documents Law)**

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DO NOT WRITE IN THIS SPACE

Copy below is hereby approved as to form and legality. Attorney General.

BY \_\_\_\_\_  
(DEPUTY ATTORNEY GENERAL)

\_\_\_\_\_  
DATE OF APPROVAL


☐ Check if applicable  
Copy not approved. Objections attached

Copy below is hereby certified to be true and correct copy of a document issued, prescribed or promulgated by:

Philadelphia Parking Authority  
(AGENCY)

DOCUMENT/FISCAL NOTE NO. Pending with Office of Budget.

DATE OF ADOPTION June 25, 2015

BY   
Vincent J. Fenerty, Jr.

TITLE: Executive Director

Copy below is hereby approved as to form and legality. ~~Executive or~~ independent Agencies.

BY   
Dennis G. Weldon, Jr.  
General Counsel

6/25/15  
DATE OF APPROVAL

☐ Check if applicable. No Attorney General approval or objection within 30 days after submission.

Final Rule Making No. 126-10  
Final Rulemaking  
Philadelphia Taxicab and Limousine Regulations  
52 Pa. Code §§ 1017.78 and 1021.12

The Philadelphia Parking Authority on June 25, 2015, adopted a Final Rulemaking Order to clarify retention and use procedures related to images captured by a taxicab safety camera system. The contact person is Dennis G. Weldon, Jr., General Counsel, 215-683-9630.

# THE PHILADELPHIA PARKING AUTHORITY

In Re: Philadelphia Taxicab and  
Limousine Regulations  
Image Retention and Use

:  
: Docket No. 126-10  
:  
:

## FINAL RULEMAKING ORDER

### BY THE AUTHORITY:

The Authority is the sole regulator of all taxicab and limousine service in Philadelphia.<sup>1</sup> In furtherance of those regulatory functions, the Authority issued a proposed regulation at this docket number on August 27, 2014. The initial public comment period for this rulemaking proceeding concluded on Dec 15, 2014, without receipt of comments. The Independent Regulatory Review Commission (“IRRC”) submitted its comments on January 14, 2015. The Authority has completed its review of the comments and now issues the final-form regulation.

### *Purpose of the Final-Form Regulation*

All taxicabs in Philadelphia will be equipped with safety cameras. Those cameras will capture images related to taxicab service to deter crimes against drivers, assist in the investigation of alleged crimes and regulatory violations and bad behavior in general. In most cases, images recorded by these safety cameras will be stored locally and overwritten on a scheduled basis. The local images will be secure within a hard drive or “black box” in the taxicab. A black box is accessible only by Authority’s Taxicab and Limousine Division Enforcement Department.

While the current regulation requires certain images from a taxicab’s safety camera to be transmitted to both the Authority and the taxicab’s dispatcher to assist

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<sup>1</sup> The act of July 16, 2004, (P.L. 758, No. 94), 53 Pa.C.S. §§5701 *et seq.*, as amended, (the “act”)

in law enforcement response times and investigations, the Authority has approved a proposed regulation (Docket No. 126-12), which will eliminate that transmission requirement. The Authority has also granted the taxicab industry a waiver from compliance with that transmission requirement, pending final approval of regulation 126-12.

The proposed regulation establishes requirements related to the limited retention of safety cameras images when physically accessed by the Enforcement Department. The regulation also clarifies the scenarios in which the Authority will access a safety camera's stored images.

#### **B. The regulation.**

We propose amending the proposed regulatory language to provide guidance and limitations upon the use and retention of images captured by safety camera systems and to prohibit the inappropriate activation of the taxicab distress button, as follows:

#### **DISCUSSION**

The Authority has reviewed IRRC's comment to the proposed regulation and has modified the proposed regulation in response and otherwise, as provided below. There were no public comments.

#### *§ 1017.78. Use of Captured images.*

Section 1017.78 of the final-form regulation has been amended to delete all references to dispatchers, which constituted a significant portion of the regulation. The final-form regulation does not provide for a scenario in which the dispatcher will have access to or ever come into possession of any image recorded by a safety camera.



*Subsection (b).* This subsection has been amended to add reference to subsection (e), which also provides for the release of captured images.

*Subsection (c).* This subsection has been amended to identify the proposed language as paragraph (1) and to add new language under paragraph (2). Because the final-form regulation no longer provides for a system that transmits safety camera images from the taxicab to anyone, the only way to view images will be through physical access to the black box, which requires an encrypted access key. The restriction in the proposed regulation limiting access to the black box to the Authority's Enforcement Department has not changed.

Paragraph (2) establishes limitations upon access to images retained on a taxicab's black box. Access will be limited to scenarios involving a court order, a request from a law enforcement agency or an active administrative investigation when written authorization to access the black box has been provided by the Manager of the Enforcement Department or Trial Counsel. This limitation upon the Authority's access to images on the black box will create a record of instances where such access is necessary and clearly prohibits random review of stored images by anyone, including the Authority.

*Subsection (e).* IRRC questioned when images released to law enforcement will be deleted by the Authority. Preliminarily, the proposed regulation provided that every image recovered by the Authority must be deleted 31 days from the date first obtained, unless an enumerated reason necessitated retention existed. That language has been retained in the final-form regulation.

The final-form regulation includes new paragraphs numbered (3) and (4). These paragraphs provide that images excluded from deletion pursuant to the preceding language in this subsection will be deleted within 1 year of the final disposition of the related administrative or criminal proceeding. This language addresses the fact that these matters may remain active in the courts or before other

tribunals long after the 31 day deletion period, but also creates a definitive end date for retention.

Paragraph (4) provides that images connected to a successful criminal prosecution or finding of administrative liability may be retained for up to 5 years or longer if good cause is found by a presiding officer in the Adjudication Department after notice to the relevant party. The presiding officer's decision is subject to appeal as provided in 52 Pa. Code §§ 1005.184 and 1005.211 (relating to authority of presiding officer; and exceptions to recommended decisions).

Images subject to this heightened retention duration will not be evidence to a potential bad act, but evidence used to prove that a bad act actually did occur. The images will have already been publicly displayed in a court of law or in an administrative hearing in open courtrooms, released to private defense attorneys and subject to media publication. For these reasons, we find that privacy concerns related to these images will nearly always be unwarranted, although the Authority will continually be bound to hold these images in a confidential manner as provided in subsection (b).

*Subsection (g).* Subsection (g) has been added to delineate images captured during system certification from those related to an investigation or otherwise active safety camera system. As provided in Section 1017.71(b), before a taxicab may enter operation with a new safety camera system it must be inspected by the Authority. In order to make certain that the camera system works, the Enforcement Department will cause events intended to triggering the safety camera's recording sequence then check the black box to make sure it works.

This testing is completed at Authority facilities. The images captured will show an empty taxicab, but will be saved to evidence that the system worked properly upon introduction to service.

*Affected Parties.*

The regulation will affect taxicab owners, drivers and those who travel in taxicabs.

*Fiscal Impact.*

The final-form regulation will have no fiscal impact or increase any paperwork obligation as to any party, the Commonwealth, any political subdivisions, private sector person or the general public.

*Effective Date and Conclusion*

The final-form rulemaking will become effective upon publication in the *Pennsylvania Bulletin*. Accordingly, under sections 13 and 17 of the Act, 53 Pa.C.S. §§ 5722 and 5742; section 5505(d) of the Parking Authorities Act, act of June 19, 2001, (P.L. 287, No. 22), *as amended*, 53 Pa. C.S. §§ 5505(d)(17), (d)(23), (d)(24); sections 201 and 202 of the Act of July 31, 1968, P.L. 769 No. 240, 45 P.S. §§ 1201-1202, and the regulations promulgated thereunder at 1 Pa. Code §§ 7.1, 7.2, and 7.5; section 204(b) of the Commonwealth Attorneys Act, 71 P.S. 732.204(b); section 745.5 of the Regulatory Review Act, 71 P.S. § 745.5, and Section 612 of the Administrative Code of 1929, 71 P.S. § 232, and the regulations promulgated at 4 Pa. Code §§ 7.231-7.234 the Authority proposes adoption of the final regulations set forth in Annex A, attached hereto;

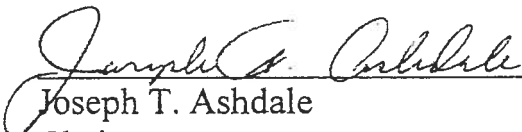
**THEREFORE,**

**IT IS ORDERED THAT:**

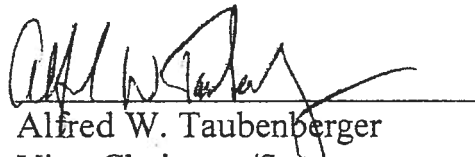
1. The Authority hereby adopts the final regulation in Annex A.

2. The Executive Director shall cause this order and Annex A to be submitted to the Office of Attorney General for approval as to legality.
3. The Executive Director shall cause this order and Annex A to be submitted for review by the designated standing committees of both Houses of the General Assembly, and for formal review by the Independent Regulatory Review Commission.
4. The Executive Director shall cause this order and Annex A to be submitted for review by the Governor's Budget Office for review of fiscal impact.
5. The Executive Director shall cause this order and Annex A to be deposited with the Legislative Reference Bureau for publication in the *Pennsylvania Bulletin*.
6. The Executive Director shall serve copies of this order and Annex "A" upon each of the commentators and take all other actions necessary to successfully complete the promulgation of this regulation.
7. The regulations embodied in Annex A shall become effective upon publication in the *Pennsylvania Bulletin*.
8. The contact person for this rulemaking is Dennis G. Weldon, Jr., General Counsel, (215)-683-9630.

**THE PHILADELPHIA PARKING  
AUTHORITY**

  
Joseph T. Ashdale  
Chairman  
(SEAL)

**Certified:**

  
Alfred W. Taubenberg  
Vice-Chairman/Secretary  
(SEAL)

ORDER ADOPTED: June 25, 2015

ORDER ENTERED: June 25, 2015

**THE PHILADELPHIA PARKING AUTHORITY  
COMMENTS TO PROPOSED RULEMAKING PRM-01-001 (126-10)**

[illegible]

## **ANNEX “A”**

**1017.78. Use of Captured images.**

(a) Purpose. The purpose of a safety camera system is to discourage bad acts in taxicabs in furtherance of protecting the health and safety of taxicab drivers and the public.

(b) Prohibitions. Images from a safety cameras system shall be maintained in the strictest of confidentiality and may not be duplicated, released or disclosed except as provided in subsectionS (e) AND (f).

(c) Local storage device.

(1) Data storage devices secured in a taxicab as provided in § 1017.74 (h) (relating to safety camera requirements) shall be configured to overwrite recorded images at intervals not to exceed 60 days. Only the Enforcement Department may access images stored on the data storage devices.

(2) THE AUTHORITY WILL ACCESS IMAGES ON THE DATA STORAGE DEVICES SECURED IN A TAXICAB ONLY IN THE FOLLOWING CIRCUMSTANCES:

i) UPON DIRECTION OF A COURT OF LAW.

ii) UPON DIRECTION OF A LAW ENFORCEMENT AGENCY.

iii) IN FURTHERANCE OF AN EXISTING ADMINISTRATIVE INVESTIGATION WHEN AUTHORIZED IN WRITING BY THE MANAGER OF ENFORCEMENT OR TRIAL COUNSEL.

(d) Maintenance of captured images.

(1) Each dispatcher shall identify at least one, but no more than three, key employees to be responsible for the security of images transmitted to the dispatcher as provided in § 1017.74 (relating to safety camera requirements) on the Form No. DSP 4 as provided in § 1019.9 (relating to list of affiliated taxicabs). The dispatcher shall maintain safety camera system images in password protected files accessible only by the key employee or employees.

(2) Images from a safety camera system in the possession of the Authority will be maintained and secured by the Enforcement Department in password protected files.

(e) Deletion of captured images.

(1) A dispatcher shall delete safety camera system images on the 31<sup>st</sup> day after receipt, unless one or more of the following applies:

(i) The dispatcher is directed, in writing, by the Enforcement Department to withhold designated images from deletion.

(ii) The dispatcher is directed, in writing, by a law enforcement agency to withhold designated images from deletion.

(2) The Enforcement Department shall delete safety camera system images on the 31<sup>st</sup> day after receipt, unless one or more of the following applies:

(i) The image contains evidence of criminal activity.

(ii) The image contains evidence related to a regulatory investigation or complaint.

(iii) A law enforcement agency has requested, in writing, that the image be retained.

(3)(2) The Enforcement Department shall maintain a log of all images excluded from deletion as provided in subparagraphs (i) through (iii), including reference to matterS necessitating retention and the date each image is ultimately deleted.

**(3) EXCEPT AS PROVIDED IN PARAGRAPH (4), ALL IMAGES EXCLUDED FROM DELETION AS PROVIDED IN SUBPARAGRAPHS (I) THROUGH (III), SHALL BE DELETED WITHIN ONE YEAR OF THE FINAL DISPOSITION OF THE RELATED ADMINISTRATIVE OR CRIMINAL PROCEEDING.**

**(4) IMAGES RETAINED BY THE AUTHORITY FOR USE AS EVIDENCE IN A PROCEEDING THAT RESULTS IN A CRIMINAL CONVICTION OR FINDING OF ADMINISTRATIVE LIABILITY SHALL BE DELETED WITHIN FIVE YEARS OF THE FINAL DISPOSITION OF THE RELATED PROCEEDING. THE ENFORCEMENT DEPARTMENT MAY PETITION A**



PRESIDING OFFICER IN THE ADJUDICATION DEPARTMENT FOR AUTHORIZATION TO EXTEND THIS RETENTION PERIOD, FOR AN IDENTIFIED PERIOD, UPON GOOD CAUSE SHOWN AND NOTICE TO THE PERSON CONVICTED OR FOUND LIABLE IN AN ADMINISTRATIVE PROCEEDING.

(f) Release of captured images.

(1) A dispatcher shall release safety camera system images to the Enforcement Department or a law enforcement agency upon written request.

(2) The Authority will release safety camera system images to a law enforcement agency upon written request.

(g) SYSTEM TESTING. THIS SECTION SHALL NOT BE INTERPRETED TO PRECLUDE THE RECOVERY AND STORAGE OF IMAGES BY THE AUTHORITY AS PROVIDED IN § 1017.71(B) (RELATING TO TAXICAB SAFETY CAMERAS).

**§ 1021.12. Additional requirements.**

(a) Each taxicab driver shall know the rights and limitations of any taxicab used to provide taxicab service, including the geographical limitation of partial-rights taxicabs, if applicable.

\* \* \* \* \*

(g) A taxicab driver may not activate the distress button required under § 1017.24(d)(8) except when the driver is in need of emergency assistance by law enforcement or other emergency responders.



701 MARKET STREET  
SUITE 5400  
PHILADELPHIA, PA 19106  
215.683.9600

**Reply to: Dennis G. Weldon, Jr.**  
Associate General Counsel  
Direct Line: 215.683.9630  
Facsimile: 215.683.9619  
E-Mail: [DWeldon@philapark.org](mailto:DWeldon@philapark.org)

July 2, 2015

**VIA HAND DELIVERY**

John F. Mizner, Esquire  
Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Re: Docket No. and Agency/ID No. 126-10  
Final Form Rulemaking  
Philadelphia Taxicab & Limousine Regulations  
52 Pa. §§ 1017.78 and 1021.12  
Image Retention and Use


Dear Chairman Mizner:

Enclosed please find one (1) copy of the regulatory documents concerning the above-captioned rulemaking. Under Section 745.5(a) of the Regulatory Review Act, the Act of June 30, 1989 (P.L. 73, No. 19) (71 P.S. §§745.1-745.15) the Authority, on October 29, 2014, submitted a copy of the Notice of Proposed Rulemaking to the Independent Regulatory Review Commission (IRRC), the Authority's standing committees and the Legislative Reference Bureau. The notice of proposed rulemaking was published at 44 *Pa.B.* 7176 on November 15, 2014.

In preparing this final form rulemaking, the Authority has considered all comments received from IRRC and the public. On June 25, 2015, the Authority entered a Final Rulemaking Order adopting final form regulations under this docket. We have notified the commentators of this Final-Form Rulemaking and have enclosed the list of the commentators. The purpose of the rulemaking is to clarify retention and use procedures related to images captured by a taxicab safety camera system.

The undersigned is the contact person for this rulemaking.

Sincerely,  
The Philadelphia Parking Authority

By:   
Dennis G. Weldon, Jr.  
General Counsel  
(215) 683-9630

DGW/pdm

Enclosures

cc: Joseph T. Ashdale, Chairman

Vincent J. Fenerty, Jr., Executive Director

James R. Ney, Director, TLD



[www.philapark.org](http://www.philapark.org)

TRANSMITTAL SHEET FOR REGULATIONS SUBJECT  
TO THE REGULATORY REVIEW ACT

ID Number: 126-10

Subject: Image Retention and Use

Philadelphia Parking Authority

TYPE OF REGULATION

- ☐ Proposed Regulation
- ☒ Final Regulation with Notice of Proposed Rulemaking Omitted.
- ☐ Final Regulation
- ☐ 120-day Emergency Certification of the Attorney General
- ☐ 120-day Emergency Certification of the Governor

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FILING OF REPORT

<u>Date</u>	<u>Signature</u>	<u>Designation</u>
<u>7/2/15</u>	<u>[Signature]</u>	<u>HOUSE COMMITTEE</u> (Caltagirone) Urban Affairs
<u>7/2/15</u>	<u>[Signature]</u>	HOUSE COMMITTEE (Petri) Urban Affairs
<u>7-2-15</u>	<u>[Signature]</u>	<u>SENATE COMMITTEE</u> (Tomlinson) Consumer Protection and Professional Licensure
<u>7-2-15</u>	<u>[Signature]</u>	SENATE COMMITTEE (Boscola) Consumer Protection and Professional Licensure
<u>7/2/15</u>	<u>[Signature]</u>	Independent Regulatory Review Commission
<u>7/2/15</u>	<u>[Signature]</u>	Office of the Budget
<u>          </u>	<u>          </u>	Legislative Reference Bureau
<u>          </u>	<u>          </u>	Attorney General