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Via Email and First Class Mail

July 7, 2015

Independent Regulatory Review Commission
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**Re: IRRC No. 3103, Doc. No. 126-11, Proposed Rulemaking Order,
Philadelphia Taxicab and Taxicab Vehicle Standards**

Dear Messrs. Weldon and Ney:

The Disability Rights Network of Pennsylvania (DRN) is the statewide, non-profit organization designated as the federally-mandated organization to advance and protect the civil rights of Pennsylvanians with disabilities. DRN urges the approval of the Philadelphia Parking Authority's proposed regulations issued pursuant to IRRC No. 3103, Docket No. 126-11 which

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Protecting and advancing the rights of people with disabilities

will require all vehicles proposed for medallion taxicab service after a designated date to be wheelchair accessible vehicles (WAVs).

People with disabilities have been denied access to taxi service in Philadelphia for far too long. The approval of these regulations will further erode one of the biggest barriers that limits people with disabilities' full participation in the community – the lack of accessible transportation. Wheelchair accessible taxis will expand the transportation options for people with disabilities and provide them with increased freedom and opportunities for employment, recreation, and travel to health care appointments, shopping, and other places in the community. This historic expansion will make Philadelphia the first city in the U.S., and the second in the world, with a fully accessible taxi system.

Over 130,000 Philadelphians have a mobility disability.¹ Currently, these residents, as well as visitors with disabilities, have very limited transportation options. The Americans with Disabilities Act (ADA) paratransit eligibility requirements are very strict, and many people with disabilities do not qualify for paratransit. Visitors are also typically not eligible for paratransit and are left without easy or efficient transportation options, which may discourage them from visiting Philadelphia. Even those who are eligible for paratransit face many restrictions and limitations on the actual service in terms of scheduling and availability that are not present in a fully accessible taxi system. There are many situations where the use of a fixed route bus is not practical for someone with disabilities, especially in inclement weather or when several transfers are required. Wheelchair accessible taxicabs will significantly expand transportation options for people with disabilities, thereby expanding opportunities for employment, recreation, and full participation in the community.

A fully accessible taxi system means that Philadelphia residents and visitors with disabilities will truly be afforded equal access to Philadelphia's taxis. As is the case now in Philadelphia, when only some vehicles in a city's taxi system are accessible, passengers who need a WAV must make a reservation in advance or endure long wait times for a vehicle that meets their needs. Only when a taxi system is fully accessible are passengers with disabilities able to hail a taxi on the street, or to have one dispatched

¹ U.S. Census Bureau, 2011-2013 3-Year American Community Survey.

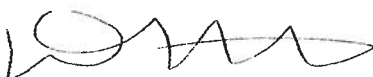
to them on an equal basis as those without disabilities. The Proposed Rulemaking Order will enable this full access.

The cost of complying with these regulations is the cost of affording equal access to Philadelphia's taxis. These costs will be borne gradually as taxicabs are replaced. Furthermore, these costs are an investment that will open the taxi system to a new segment of the market. This system will enable people with disabilities to secure and maintain jobs, which will lead to new revenue for taxi companies and economic benefit to the city as a whole. Additionally, a fully accessible taxi system will benefit local businesses, as it will open them to a new segment of the market.

Therefore, DRN strongly urges the approval of Doc. No. 126-11, Proposed Rulemaking Order, Philadelphia Taxicab and Taxicab Vehicle Standards.

Thank you for consideration of these comments.

Sincerely,



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