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# PHILADELPHIA CAB ASSOCIATION

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RECEIVED  
IRRC

July 9, 2015

*Via Electronic Mail*  
Independent Regulatory Review Commission  
333 Market St., 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Re: Proposed Regulation No. 126-11

Dear Members of the Commission:

Please consider these comments on behalf of the Philadelphia Cab Association (PCA) regarding Proposed Regulation No. 126-11. PCA is a non-profit association of hundreds of Philadelphia taxicab drivers. PCA opposes the Proposed Regulation for the reasons below:

1. There will be a shortage of taxicab drivers.

In order to become a driver of a wheelchair accessible vehicle (WAV), a taxicab driver must have at least 2 years of Philadelphia taxicab driver experience as a PPA certificated driver (52 Pa.C.S. § 1021.5a(b)(7)(i)). If all taxicabs are converted to WAVs, no new drivers will be permitted to drive these vehicles and drivers who are already certificated but who have less than 2 years' experience will be shut out of the industry. This is not fair to drivers who have paid for licenses with the expectation that they will be eligible to drive standard taxicabs. The PPA did not propose alternatives to the WAV driver requirements and did not consider the impact the Proposed Regulation would have on taxicab drivers. Over time, if an experienced WAV driver leaves the industry, it will be nearly impossible to replace him. The Proposed Regulation does not account for the entry of new taxicab drivers into the market, nor does it consider what will happen to less seasoned drivers who are ineligible to drive WAVs. The Proposed Regulation

will lead to a shortage in driver supply and unfairly cuts off newer drivers from their ability to earn a living.

Even drivers who are qualified to drive a WAV taxicab may not be able to do so because of health issues. Transporting passengers in wheelchairs requires physically helping these passengers get into taxis. Many drivers are older and are not fit enough to physically assist wheelchair-bound riders. Rather than having the option to not drive a WAV taxicab, these drivers will be forced out of the industry.

The Proposed Regulation unfairly harms taxicab drivers.

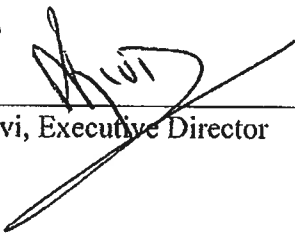
2. **The Proposed Regulation makes us less competitive.**

Drivers are already facing unfair competition from illegal services like Uber and Lyft. The Proposed Regulation will only make this problem worse. Uber and Lyft's customers are able to choose from a variety of vehicle options: sedans, hybrids, minivans and SUVs. Currently our customers have the same options, but if the Proposed Regulation is passed, our customers will only be able to ride in WAVs. For better or for worse, not all riders prefer WAVs. WAVs are slower, noisier and are not as fuel efficient as other types of vehicles. Many customers are also under the false impression that WAV taxicabs cost more than traditional vehicles. All of these factors will cause the taxicab industry to lose more and more customers to illegal operators like Uber and Lyft and will eventually put us out of business.

As mentioned, WAV vehicles are less fuel efficient than other types of vehicles currently used for taxicab service. Increased fuel costs only add to the growing list of problems taxicab drivers are currently facing. Forcing new WAVs upon the industry will also lead to increases in medallion leases for drivers. In order to cover costs of operations and higher insurance premiums, drivers will be forced to pay higher medallion leases. The PPA did not consider such costs in its Proposed Regulation and makes no effort to understand how the Proposed Regulation will impact taxicab drivers.

The Proposed Regulation will harm taxicab drivers at a time when taxicab drivers are already facing illegal, unfair competition from Uber and Lyft. The Proposed Regulation does not make any considerations for taxicab drivers, even though they are the lifeblood of this industry. For these reasons, the PCA respectfully requests that IRRC deny the Proposed Regulation.

Sincerely,

  
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Khalid Alvi, Executive Director

cc: James R. Ney (via email)  
Dennis G. Weldon, Esquire (via email)