

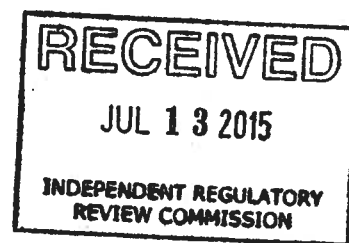
3103



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Phone: 215 383-3620 Fax: 215 710-0689

July 13, 2015

John F. Mizner, Esq. Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 19101



No. 3103 PPA #126-11

Mr. Chairman and Panel Members:

Please allow this correspondence to serve as comments to the proposed regulation regarding Age and Mileage Limitations, No. 3103 PPA #126-11. As you know, I am the Executive Director of the Greater Philadelphia Taxi Association (GPHLTA).

Our members support the Regulation, but would like to point out the issues below that should be addressed before the Regulation is enacted in its final form.

First, the existing regulations of the Philadelphia Parking Authority require a WAV taxicab driver to have 2 years of experience as a Philadelphia taxicab driver. *See* 52 Pa. Code § 1021.5a(b)(7)(i). With the conversion of all taxicabs to WAVs, all taxicab drivers are now required to have 2 years of experience. The Regulation, in essence, permanently shuts new drivers out of the industry and provides medallion owners with no driver pool to replace drivers that leave the market. GPHLTA believes that creating a barrier to entry for new drivers is an unintended result of the Regulation and suggests that the 2-year requirement be eliminated.

Second, the existing PPA regulations provide that the number of WAV taxicab drivers may not exceed the product of the number of WAV taxicabs multiplied by four. There is currently no taxicab driver cap for standard taxicabs. Now, with the conversion of taxicabs to WAVs, the driver cap applies to all fleets. The impact of a driver cap on the industry will be detrimental. It will reduce the pool of drivers available to medallion owners and create another barrier to entry for new drivers.

Third, the Regulation does not address the existing regulations regarding WAV driver training or the requirements for WAV taxicab driver renewal. The existing regulations provide that WAV taxicab driver training consists of a minimum of six hours of in-class instruction and 4 hours of continuing WAV taxicab service training every 2 years. *See* 52 Pa. Code § 1021.8(c).



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The PPA is now providing this training to the industry. With the conversion of all taxicabs to WAVs, however, our membership is concerned that the PPA will not have the resources to provide the required training. As a result, drivers will face delays in obtaining their driver certificates and medallion owners will have fewer drivers from whom to choose. We strongly suggest that the PPA consider outsourcing driver training to the private sector or allowing medallion owners to provide their own WAV driver training with the PPA's oversight.

Additionally, the regulations provide that the PPA will not renew a WAV taxicab driver's certificate unless that driver has provided 1,600 hours of service in the prior 12-month period. This purpose of this requirement, presumably, was to ensure that WAVs were being fully utilized and that WAV drivers were committed to providing WAV service. The 1,600-requirement, which applies to all drivers under the Regulation, is now unnecessary given that all taxicabs will be WAVs. This requirement is also burdensome and unrealistic and not based on any study of the number of hours that a driver is typically in service throughout the year.

Finally, our members ask that the PPA introduce a new regulation surrounding a wheelchair accessible dispatch program that would include driver incentives, public service announcements and coordinated dispatch standards in order to increase accessibility for the public and earnings for drivers. The PPA should look at the regulations in place in other cities, such as New Orleans, Chicago and New York, to see how these cities have implemented successful wheelchair accessible programs. By introducing such a regulation, the PPA would also help to ensure that Philadelphia's wheelchair accessible program is viable and successful moving forward. GPHLTA urges the PPA to address these major concerns before the Regulation is made final.

Of course if you should have any questions or comments, feel free to contact me at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "David Alperstein", is written over a large, light-colored scribble or watermark. The signature is fluid and cursive.

David Alperstein  
Executive Director

DRA/th