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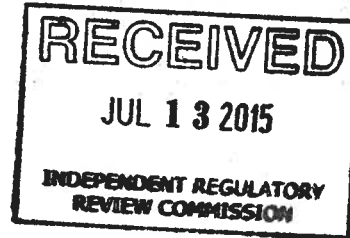
Kathy Cooper

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Sent: Monday, July 13, 2015 11:58 PM
To: IRRC; dweldon@philapark.org; jney@philapark.org
Subject: Philadelphia Parking Authority's Proposed Rulemaking Order 126-11

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Today, July 13th 2015, only 8 of the 1,599 taxicabs in Philadelphia are FAVs* – 0.5%.
(*I am going to use the term “fully accessible vehicle/FAV” rather than “wheelchair accessible vehicle/WAV” in this discussion because WAV risks sounding like the vehicle is strictly for passengers in wheelchairs while actually the entire point is that a FAV is accessible to everyone)

By 2021, still just 150 of the 1,725 taxicabs will be FAVs – 8.7%.

There is no such thing as 8.7% integration. A system is either 100% integrated, or it is segregated.

No industry that serves the public should still be segregated in 2015 America. Our nation rejected the notion of “separate but equal” over sixty years ago. It is inherently unequal for a business to require one customer to schedule a taxicab 24 hours in advance while it enables another customer to conveniently hail a taxicab from the street. It is inherently unequal for a business to provide one customer access to its entire fleet while it provides another customer with access to only a fraction. In 2015 America it would be morally reprehensible for a taxicab company to provide separate levels of service to its customers along the lines of race, gender, national origin, sexuality, etc. - and it is no less morally acceptable to do so along the line of ability.

We can only reach a fully accessible, fully integrated future if we take concrete actions to begin building it today. Proposed Rulemaking Order 126-11 is a landmark action that will do just that.

There are ways to make this strong act even stronger:

- This regulation would transform the taxicab industry in Philadelphia and it is imperative to bring all stakeholders to the table. The PPA needs to organize forums where taxicab business owners, taxicab drivers, disability advocates and more can come together to work through issues like driver training and requirements, vehicle standards, etc.

- In collaboration with the City and SEPTA, a portion of public monies already being used to subsidize transportation for passengers with disabilities through costly paratransit services can be allocated to offset costs to companies and drivers through a public/private partnerships similar to programs in cities like Chicago and New York while providing better, integrated service to all Philadelphians.

- In a busy city like Philadelphia, rear-entry vehicles that require wheelchair users to enter from the street are markedly more dangerous than side-entry vehicles. There is a reason why every SEPTA vehicle has passengers enter through the curbside rather than the rear. Please consider addressing this in the vehicle standards section of the regulation.

It is important that this rulemaking passes so that the City of Brotherly Love becomes the first city in America with a fully integrated taxicab system. Thank you so much for working to build a better Philadelphia,

With Liberty and Taxis for All,
Matthew Clark

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