

3103

Kathy Cooper

From: Curt
Sent: Monday, July 13, 2015 6:00 PM
To: IRRC; dweldon@philapark.org; jney@philapark.org
Subject: Philadelphia Parking Authority's Proposed Rulemaking Order 126-11

To:
Independent Regulatory Review Commission
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Harrisburg, PA 17101

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James R. Ney, Director
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2415 S. Swanson Street
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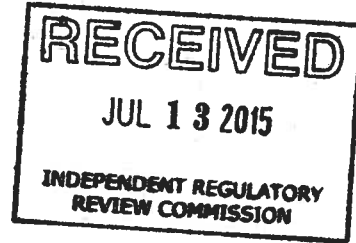
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Re: IRRC No. 3103, Doc. No. 126-11, Proposed Rulemaking Order,
Philadelphia Taxicab and Taxicab Vehicle Standards

Dear Members of the IRRC, Messrs. Weldon and Ney:

The National Disability Rights Network (NDRN) is the non-profit membership organization for the federally mandated Protection and Advocacy (P&A) and Client Assistance Program (CAP) Systems for individuals with



disabilities. The P&As and CAPs were established by the United States Congress to protect the rights of people with disabilities and their families through legal support, advocacy, referral, and education. P&As and CAPs are in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Territories (American Samoa, Guam, Northern Mariana Islands, and the US Virgin Islands), and there is a P&A and CAP affiliated with the Native American Consortium which includes the Hopi, Navaho and Piute Nations in the Four Corners region of the Southwest.

The Disability Rights Network of Pennsylvania is our Pennsylvania affiliate. Collectively, the P&A and CAP System is the largest provider of legally based advocacy services to people with disabilities in the United States.

One area of legally based advocacy performed by the P&As and CAPs is around community integration. Accessible transportation is a critical element of living in one's own community and having access to employment and educational opportunities as well as to the arts and cultural events and locations when travelling to a city such as Philadelphia with its plethora of educational, cultural and historic locations.

NDRN urges the approval of the Philadelphia Parking Authority's proposed regulations issued pursuant to IRRC No. 3103, Docket No. 126-11 which 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 help reduce one of the most significant 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. It is our understanding that this expansion will make Philadelphia the first city in the U.S., and the second in the world, with a fully accessible taxi system.

A fully accessible taxi system means that Philadelphia residents and visitors with disabilities will truly be afforded equal access to Philadelphia's taxis. This is unlike the current case now in Philadelphia, when only a very few vehicles in a city's taxi system are accessible, it is our understanding that 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 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 may permit the public transit authority to contract with taxis to reduce the costs of paratransit and provide more flexibility for people with disabilities who need transportation on short notice and the public transit agency to provide required complementary service. Contracting with the public transit agency for some paratransit trips could also provide a source of revenue for the taxi system assuming drivers are appropriately vetted and trained to provide paratransit trips.

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

Thank you for the opportunity to Comment on the proposed regulations.

Sincerely,

Curtis Decker
Executive Director
National Disability Rights Network

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