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Taxi Workers Alliance of Pennsylvania

1031 Spring Garden St 1st Fl.

www.twapa.org

(215) 279-0472

twapai@yahoo.com

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IRRC

The Honorable John F. Mizner, Esq. Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RE: IRRC #3103 – Philadelphia Parking Authority #126-11

Greetings Mr. Chairman and Fellow Commissioners;

On behalf of the 1,200 members of the Taxi Workers Alliance of Pennsylvania (TWA), we wish to submit comments on the Philadelphia Parking Authority (PPA), proposed regulation #126-11. As you may know, TWA represents the actual taxi drivers, who in many cases earn less than \$5.00/hr, work between 12 to 14 hours per day, and perform one of the most dangerous occupations according to the US Dept. of Labor. We understand that several organizations have filed federal lawsuits against the PPA concerning violations of the American with Disabilities Act. We further understand that the PPA is genuinely seeking solutions to address this issue. The problem with #126-11 is that the low income taxi driver will be required to be the one that is socially responsible, with no help from other players in the industry. While we support taxicab service for all, we wanted to emphasize the impact that this proposed regulation will have on low income taxi drivers and offer possible alternatives.

I. Impact PPA #126-11 will have on taxicab drivers :

- Drivers have a choice of three leasing options: (1) they shift 12 hours, not owning either the vehicle or medallion, (2) they lease both the vehicle and medallion for 24 hours, and (3) they lease the medallion for 24 hours but they own the vehicle. In the last category, 80% of the vehicles used as medallion taxicabs in Philadelphia are actually owned by the drivers. This is probably why most vehicles are cheap former police cruisers. The impact of this regulation will force drivers to obtain loans of \$30,000 or more over a 5 year period for these new vehicles, and to repeat these loans every 5 years. Also, drivers will need to upgrade the vehicle's insurance coverage because of the loan. This standard will further reduce the \$5/hr that drivers currently earn. The other 2 leasing categories will force taxi medallion owners to increase their lease to drivers to offset the cost of these vehicles. The alarming part of increasing leases is that most of the owners are already overcharging drivers according to PPA regulations. For example, to lease just the medallion per week, PPA regulation sets a maximum of \$420/week. However, most owners are charging drivers \$450/week. The PPA is unable to stop the overcharging by owners. So we are arguing that this regulation will further increase leases on drivers that are already illegal with no enforcement protection from the PPA.

- Drivers already subsidize consumers who pay with credit cards. Drivers lose 5% off of every credit card trip. Neither the PPA nor Taxi owners lose anything from credit card transactions. In fact, some owners actually profit from drivers processing credit cards. Now marginalized drivers will be required to subsidize another marginalized group with no help from owners or government.
- Every driver will need to attend training without compensation. The drivers will still need to pay the lease to the owners during these training sessions. Again this is another example where drivers take all risk and social responsibilities, and the owners continue to take uninterrupted profits.
- Some taxi drivers work while being classified as disabled. The propose regulation does not leave these drivers with relief. They will be required to push wheelchairs, maneuver hydraulic equipment, and other physical activities beyond their capabilities.
- While no ones to blame, performing wheelchair accessible trips, drivers must use more time to insure safety for the customer and all those around the task. This will surely have an impact on drivers' earnings.

II. Alternatives and or modifications for PPA #126-11:

- The PPA is in the process of auctioning off 150 wheelchair accessible medallions. The average price for these medallions is about \$100,000. The PPA will sit on a windfall of \$15 million when all is said and done. The PPA Taxi and Limo Department budget is paid from a \$1 surcharge on each parking ticket written in Philadelphia and the remainder from the taxi and limousine industry. At the end of each fiscal year they have always shown a surplus. In fact, the PPA continues to raise their budget on the industry successfully each year without any help from the State. The question becomes; why do they need to sit on this \$15 million windfall. TWA suggests that part of the sale of these new medallions could be used to help subsidize drivers when purchasing new vehicles. This would help to maintain already meager earnings of drivers and owners wouldn't be pressured to further increase unlawful leases.
- The PPA, local and state governments, disability advocates, and the taxi industry must work together in seeking federal funding to make Philadelphia's taxi industry 100% accessible. These propose regulation leaves the burden and responsibility on those least able to afford it. Training requirements for drivers must be subsidized somehow.
- The PPA should show examples of other US cities whose taxi industry are 100% accessible. If such cities exist, then we can learn how to implement this propose regulation.
- The PPA can enhance #126-11 by requiring 100% accessibility from limousines under their jurisdiction, especially the Transportation Network Companies that are flourishing in the city. Social responsibility is a civic duty for the entire transportation industry, not just required of low income taxi drivers.
- The PPA must conduct a study/survey to determine the actual need of 100% accessibility of taxicabs. Philadelphia has the highest poverty rate among the US top 10 cities. Taxi demand varies throughout the city depending on socio-economic conditions.

The Taxi Workers Alliance has and will continue to work with advocates for people with disabilities. We believe that this proposed PPA regulation is not well thought out. The PPA should form a committee of stake holders and look to other cities that have successfully implemented a viable wheelchair accessible taxi program. We believe that this current regulation doesn't address key areas of concern and goes too far in other areas. The PPA is known for rash decision making. For example, the safety light for taxicabs regulation that the PPA abandon. TWA recommended that a simple discreet light be placed on the rear trunk of all vehicles. Instead the PPA proposed a large lollipop type light on the rear. Nowhere in any other locale was this done. Same thing with the security cameras, TWA recommended a simple photo of anyone entering or exiting the cab. This form of security is done in many cities. Instead the PPA proposed several video cameras throughout the vehicle including one in the driver's face. They want to make a motion picture on every taxi trip. This regulation also goes too far and is being met with stiff resistance from the industry. The whole purpose was to reduce injuries and assault to drivers, instead the PPA was looking at ways to further impose fines to those that are under attack.

For these reasons, it is our hope that the PPA addresses some of the serious questions in our comments and considers how we all can move forward with taxicab accessibility. We humbly request the Independent Regulatory Review Commission to look at this issue carefully on how it will impact those who must carry out the propose regulation.

Respectfully submitted ;



Ronald Blount - President