

3116

RECEIVED
IRRC

2015 OCT -2 AM 8:59

Pennsylvania Taxi Association
2301 Church St.
Philadelphia, PA 19124

October 1, 2015

Via Electronic Mail
Independent Regulatory Review Commission
333 Market St., 14th Floor
Harrisburg, PA 17101

Re: Proposed Regulation No. 126-12

Dear Members of the Commission:

The Pennsylvania Taxi Association supports the implementation of safety cameras in Philadelphia taxicabs and fully supports the proposed changes to 52 Pa. Code § 1017.74. However, 126-12 misses a major issue. The purpose of the safety camera requirement is to protect the safety of taxicab drivers and passengers. However, all taxicabs are already equipped with protective shields ("partitions") to achieve this same end. Requiring both cameras and partitions is redundant and we believe that the PPA should allow drivers to remove partitions from their vehicles voluntarily once their vehicles are equipped with safety cameras.

Recently, the PPA has been pushing to improve the appearance of taxicabs. One of the most unsightly features in any taxicab is the partition. It is often dirty, scratched and defaced. Partitions also limit passenger legroom and prevent the proper circulation of heat and air-conditioning. Safety cameras provide at least an equal level of protection to that of partitions without compromising safety or comfort.

Removing partitions is a move towards modernization, a goal that has been emphasized by the Authority repeatedly. The removal of partitions will improve the appearance of taxicabs. Improving the appearance of taxicabs will increase public demand for taxis and will benefit the industry at a time when it is facing a financial crisis due to illegal competition from UberX and Lyft.

Partitions will no longer be necessary to protect drivers and passengers once safety cameras are installed in Philadelphia taxicabs. In addition to improving vehicle appearance and customer experience, safety cameras provide protections that are at least equal to that of partitions.

Sincerely,



Danielle Friedman, Esquire
Counsel for Pennsylvania Taxi Association