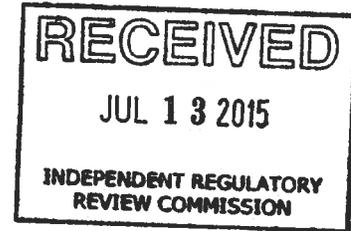


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July 13, 2015



Via Electronic Mail

Independent Regulatory
Review Commission
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Re: Philadelphia Parking Authority 126-11 "Modern Taxicab Standards"

As the Center for Independent Living serving the disability community in Philadelphia, Liberty Resources strongly supports the regulations proposed by the Philadelphia Parking Authority. Increased accessible transportation services and options are vitally important to seniors and people with disabilities to commute and travel throughout Philadelphia. Because accessible transportation is such an important aspect of independent living for people with disabilities, it has been a consistent advocacy objective for LRI, Disabled in Action of Pennsylvania, Inc., ADAPT, the Taxis for All Philadelphia alliance and many other groups for well over the past two decades.



It is with this demonstrated history of advocacy that at long last, the PPA has heeded the demands of the senior and disability communities to improve access to taxi service in Philadelphia with a consistent, required transition to wheelchair accessible vehicles that have the ability to serve all riders, including seniors, people with disabilities, and our disabled veterans.

For these reasons, LRI supports the PPA regulations and in particular offers the following highlighted comments:

- The provision in Section 1017.4 (d)(1), requiring that as taxi medallion owners replace their taxi vehicles that 100% of the vehicles replaced must be 100% wheelchair accessible vehicles, is strongly supported by the disabled community. This will help Philadelphia transition a virtually inaccessible taxi fleet to an ultimately fully accessible fleet over a reasonable time period.
- Side Entry vs Rear Entry – is acceptable, but the reality is that the disabled community in Philadelphia has a strong preference for side entry vehicles because they can be easily and safely accessed by wheelchair users anywhere along a city block. In contrast, rear entry WAVs can only be deployed on corners where most curb cuts are located posing additional risk to riders because of busy intersection traffic.
- Emergency Preparedness – The PPA in a state of emergency should include provisions for WAV fleets to be deployed to help emergency personnel safely transport people with disabilities to areas of safety.
- That PPA work with SEPTA on innovative ways to reduce costly ADA eligible CCT paratransit service by offloading



riders to WAV at rates subsidized with the savings from reduced SEPTA CCT usage.

Thank you for the opportunity to comment on the PPA proposed regulations, we look forward to seeing the regulations promulgated and the result of increased WAV taxi service in Philadelphia for all of our citizens and visitors.

Respectfully,

A handwritten signature in cursive script that reads "Thomas H. Earle".

Thomas H. Earle, Esquire
Chief Executive Officer
