

April 11, 2012



Mr. Charles Milstein, Esq., Assistant to the Director
Taxicab & Limousine Division
2415 South Swanson Street
Philadelphia, PA 19148-4113

Mr. Milstein,

I received the letter of April 2, 2012 from Director Ney concerning the fuel surcharge proposal for taxi cabs in Philadelphia by Mr. Blount. It is my impression that the PA Utility Commission's approach is a more efficient and effective system which provides oversight from a recognized regulatory body. In consideration of customer satisfaction for those that use taxi cabs to and from Amtrak's 30th Street Station I urge PPA to adopt the PUC system that has already been a proven remedy for the fuel charge issue.

Regards,

A handwritten signature in black ink, appearing to read "B. Ravert".

Brian P. Ravert
Captain
Amtrak Police Department
Mid-Atlantic North Div.
2955 Market Street, Ramp Office
Philadelphia, PA 19104
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Mailing Address:
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Philadelphia, PA 19102
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Tel: 267-250-6480
Jeff Hornstein, Executive Director

April 12, 2012

Dear Mr. Ney:

The Greater Philadelphia Taxi Association (GPhlTA), a 501c6 trade association representing the interests of taxicab medallion owners and operators, dispatchers, taxi companies, and allied industries in Philadelphia, respectfully submits these comments to the Philadelphia Parking Authority's Taxi and Limousine Division on the Petition for a Fuel Surcharge recently filed by the Taxi Workers Alliance.

Our members believe that their first duty is to provide quality service to the public at the lowest cost possible, and thus, we oppose fee increases as a matter of principle. Nevertheless, we also know that the income of the hard-working drivers that are the backbone of the industry are very negatively impacted by rising fuel prices, which are at currently at near-historic highs. Thus we reluctantly support a fuel surcharge at this time.

But the devil is, as usual, in the details. The proposal advanced by the Taxi Workers Alliance would impose an immediate fuel surcharge of \$1 per trip in the City and \$1.50 for the airport as long as gas prices are in the \$3.51-\$4.00 range, and \$1.50 and \$2, respectively, if the prices go above \$4 per gallon. The proposal is called an "emergency proposal" but we see no mechanism for rescinding it, except, presumably, filing another petition if/when fuel process drop below \$3.50 per gallon.


By contrast, the PUC's procedure imposes a sliding scale of surcharges pegged to a menu of fuel prices. While it will probably entail more work on the part of the Parking Authority to monitor fuel prices and hold operators responsible for setting the correct surcharge rates, it eliminates the need for further action on this issue, since the PUC-style method covers virtually any possible fuel cost.

The PUC's method for calculating the surcharges relied on assumptions from 2006 that included the average trip length (6.8 miles), average gas mileage (15 MPG), and a base rate of gasoline of \$1.35 per gallon. Obviously these assumptions will need to be revised for 2012 conditions. We also believe that there should be dispensation given for Fuel Efficient Vehicles such as hybrids and CNG.

Therefore GPhlTA gives qualified support to a fuel surcharge modeled on the PUC procedures, but cannot give unqualified support until we see the details of the policy.

Our Association's members look forward to your response and to a productive dialogue.

Sincerely,


Jeff Hornstein
Executive Director

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