

Dear Mr; Milstein:

While I have been an advocate of handicap accessible taxicabs for a long time, and its time is overdue in Philadelphia, I am adamantly against the idea as proposed for the reasons set forth below and therefore propose an alternative:

1. if a random selection process of existing taxicab medallions is used to fill this void, the Authority is placing an undue financial hardship on the medallion owners by this random selection process which forces owners into an HT (Handicap Taxi) who may not be able to afford buying such a vehicle and is already struggling with the payments he may have to be making as well as the idea that he may not wish to be involved in this kind of a risk as it poses additional responsibility he may not wish to assume or be capable of assuming. .

2. the authority proposes nothing in its regulations for the training a driver must undergo to secure passengers with wheelchairs in such a vehicle, the safety of loading (location, etc). As an insurance broker and being aware of claims arising from passengers not properly secured in this kind of vehicle, I believe it is necessary training and must be offered by the PPA.

3. these medallions should be offered as additional medallions on a closed voluntary bid and limited to 100 in the first year so that it may be better assessed for the need for more, the 100 going to the highest bidder, but no more than 10 to any one owner

eg;

If Mr. John Doe owns ABC Cab Co & XYZ Cab Co he may not bid for each of the companies. If however, after all entires are made and the 100 medallions are not selected, then he may be entitled to another # < 5

This will also generate revenue for the Authority in addition to the 1600 medallions already in operation.

4. it is unfair to make a partial rights taxi turn 20% of its fleet into handicap accessible taxicabs but instead should be 1 HT for each 10, or portion thereof of, regurlaly registered taxicabs with the Authority.

Respectfully submitted,

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