

Comments of Curtis A. Jones, Jr. 2/1/2012

Dear Mr. Milstein,

As a member of Philadelphia's disability community, and a powerchair user, I support the PPA's proposed regulations to make Taxicabs accessible to anyone who has mobility issues. Thank you. Curtis A. Jones Jr.

Comments of Jeff Hornstein 2/2/2012

Dear Mr. Ney and Mr. Milstein,

On behalf of the Greater Philadelphia Taxi Association, I respectfully submit the attached comments on the Philadelphia Parking Authority's Proposed Amendments of January 19, 2012 to its Taxi and Limousine Regulations Regarding Wheelchair Accessible Taxicab Service. We look forward to productive dialogue going forward. GPhITA is bringing together industry stakeholders and we hope we can come to a mutually agreeable solution to what I think we all agree is a real problem, the lack of adequate WAV service in Philadelphia.

Best,

Jeff

Jeff Hornstein
Executive Director
Greater Philadelphia Taxi Association
Cell: 267-250-6480
Email: jhornstein@gphlta.org

Comments of the Greater Philadelphia Taxi Association on the Philadelphia Parking Authority's Proposed Amendments of January 19, 2012 to its Taxi and Limousine Regulations Regarding Wheelchair Accessible Taxicab Service

The Greater Philadelphia Taxi Association (GPhITA), 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 its recently proposed Regulation 120106 regarding the implementation of wheelchair accessible taxicab service in Philadelphia. GPhITA has concerns both with the proposal itself and the process that led to this proposal. In short, we find the proposal to be at once unnecessarily extreme, incomplete, impractical, and potentially illegal. We are

surprised that after the Commonwealth's Independent Regulatory Review Commission admonished the Authority for the process it followed in modifying its comprehensive regulations, that the PPA seemingly ignored IRRC's recommendations by issuing a proposed WAV regulation without stakeholder input, without any explication of the reasoning behind the change in the regulation and why it is in the public interest, and without a fiscal note indicating the cost to the regulated community. It is our view that PPA should not promulgate such a significant regulation without doing its due diligence as set out by IRRC. Nevertheless, we were somewhat heartened to read comments by the PPA in the press that this proposal represents merely a starting point for conversation, and thus GPhITA offers these comments in the spirit of advancing the dialogue. For the record, however, we believe that it would have made far greater sense from a public policy perspective to have engaged stakeholders in dialogue prior to the formulation of regulatory language. These discussions would have flagged the many flaws that we believe make the PPA's current proposal unworkable and would have saved us all time and energy. The process and the proposed regulation itself leave GPhITA and all other stakeholders with more questions than answers. While it is PPA's job to answer these questions, in the spirit of collaboration, we have raised some questions and attempted to answer them. For starters, the PPA has not even defined the concept of accessible cab service in its proposal: How is it different from paratransit service? When do the trip and the meter start and stop? What is expected of a cab driver providing an accessible ride?

1. What is the market demand wheelchair-accessible service?

The proposed regulation stipulates a near-immediate conversion of 300 of the City's 1,600 medallion cabs to Wheelchair Accessible Vehicles (WAVs), and conversion of the entire fleet by 2016. Where is the analysis of need? At least two medallion owners have voluntarily put Philadelphia's first WAVs into service in the past few months. We have received positive feedback about this fledgling service thus far. At least one dispatch company, Freedom Taxi, has voluntarily mandated that only wheelchair-accessible or green vehicles may join its association. In order for this regulatory mandate to pass muster, we believe that the PPA is required to demonstrate an analysis of need: Is there a demand for 300 WAVs by 2013 and for 1,600 WAVs by 2016? GPhITA offers to collaborate with the PPA in a market analysis that attempts to determine the optimal size of Philadelphia's taxi fleet, utilizing available models that consider such factors as population density, number of cars per capita or household, public transit usage, and volume of tourism, among others. From this baseline, we need to study what demand exists specifically for WAVs. Anecdotal experience with the first few WAVs in service suggests that demand is considerable; nevertheless, this is not sufficient basis for a seemingly-arbitrary determination that 300 or 1,600 WAVs are appropriate. If there is a positive finding of need, GPhITA would strongly support legislation to issue the additional medallions in an auction and to restrict an appropriate number

of these new medallions to wheelchair-accessible service. This type of thoughtful approach would avoid the confiscatory nature of the current proposal and avoid possibly unnecessary unfunded mandated costs.

Mailing Address:

1515 Market Street, Suite 802

Philadelphia, PA 19102

Email: jhornstein@gphlta.org

Tel: 267-250-6480

Jeff Hornstein, Executive Director

2. Why does the proposed regulation restrict the type of WAV?

PPA's proposed regulation specifies that the cabs must be right-side accessible. To our knowledge, the only

vehicle currently on the market that meets this specification and is taxi-ready is VPG's MV-1. This vehicle

costs about \$45,000, as compared, for example, to a new Sienna outfitted with a rear ramp, which runs about

\$30,000. Additionally, the MV-1 is powered by a V8 engine and is currently rated at 13 MPG in city driving.¹

While the MV-1 is available in a more "green" version that runs on compressed natural gas,

Philadelphia does

not currently have sufficient CNG fueling infrastructure to accommodate city-wide cab service. A

Sienna, by

contrast, runs on a V-6 engine and gets 18 MPG in city driving, a considerable savings both in terms of fuel

costs for drivers and level of emissions for the public at large.²

The WAVs currently in service in Philadelphia are compliant with requirements set forth in the

Americans with

Disabilities Act, but unlike the MV-1, these vehicles provide access through the rear of the vehicle.

Rear-access

vehicles may provide advantages to drivers operating in the constraints of a city like Philadelphia, with numerous narrow, congested one-way streets that often do not provide ready access to the curb.

Additionally,

rear-access vehicles may provide advantages in terms of accommodating a group of passengers that includes

both disabled and non-disabled persons.

We also share PPA's concerns that taxicabs be equipped to transport service animals and support its current

regulations on this topic. We do not understand what the PPA expects as a configuration for these accessible

cabs and room for a service animal. What about additional passengers? This is the type of issue that informal

discussions could address.

The proposed regulation also mandates that a WAV needs to make noise even if running in an all-electric/silent

mode. Although we recognize the potential hazard to the visually impaired, we are unaware of any such

technology that is commercially available. We are unaware of any mainstream effort to make hybrid or allelectric

vehicles make noise. The PPA needs to explain the rationale and practicality behind this requirement.

What about the issue of noise pollution in our cities and what are the tradeoffs? Should all vacant cabs play a

tune so that the visually impaired can know when to hail a ride? Do these types of details slow

program

implementations?

In sum, we do not believe that it makes sense for the PPA to privilege one type of ADA-compliant WAV over

another without carefully considering the options, conducting field tests that include customer input, performing

an economic feasibility analysis, and so forth – all with the input of stakeholders.

3. What is the cost of PPA's proposed regulation?

The PPA has offered no analysis as to the financial cost that conversion to an all-accessible taxi fleet could impose on the cab industry (both medallion owners and drivers) and the riding public. The Commonwealth's regulatory review process requires a fiscal assessment. Without access to data that is available to the PPA, GPhITA estimates an annual cost in excess of \$12.5M or about \$1.30 per trip.

□ **Cost of Vehicles:** The only vehicle that we believe meets the requirements stipulated in the proposed regulation is the MV-1, with an estimated cost of \$45,000, versus approximately \$9,000 for a Crown Victoria or similar sedan. At a useful life of a new vehicle of 5.5 years (given the maximum mileage requirement) the depreciation is \$8,181/year per vehicle. This compares to depreciation of \$3,000 used in PPA's last taxi rate assessment. The total annual effect of increased depreciation is \$8.3 million.

□ **Cost of Collision Insurance:** Taxi owners currently do not purchase collision insurance, rather selfinsuring the potential loss of vehicles with relatively low acquisition costs. Cab owners, particularly drivers and those not owned by fleets cannot take on the exposure of losing a \$45,000 asset. Using an estimate found in comments to IRRC that the cost of collision insurance is about 4% of the cost of the vehicle, and assuming a \$9,000 deductible, the cost of insurance for an all-WAV fleet would be about \$2.3 million (1,600 cabs x (\$45,000-\$9,000) x 4%) per year.

□ **Cost of Financing:** Cab owners would need to finance the \$36,000 increase in vehicle acquisition cost. At a modest 5% interest rate, and looking at an average balance of about \$20,000, the annual increase in cost would be about \$1.6 million.

□ **Cost of Training:** From experience in other cities that have implemented WAV programs, we know that successful implementation requires that drivers be trained in both the technical aspects of service provision as well as cultural awareness. We estimate that adequate training would require between 8 and 16 hours; for the sake of this estimation, we shall posit 12 hours of training, or 1.5 days. Let us assume that a driver's daily net income is about \$100, that we need to train 1,500 drivers a year to ensure that all drivers are trained in time for full fleet conversion, and that we need to pay a trainer \$75,000 per year. Costs in lost income for drivers would be \$225,000 per year, adding the cost of the trainer brings the total to about \$300,000 per year. We believe that the PPA should fund this mandate and not impose the cost on drivers and owners.

Thus, our rough, preliminary estimate of the cost of the implementation of an all-accessible fleet as defined in the PPA's proposed regulation is approximately \$12.5 million annually. If each cab provides about 6,000 trips per year, this translates into \$1.30 per trip, which we assume the PPA might consider passing along to consumers. Note that this very preliminary financial analysis does not include such costs as economic dislocations to medallion owners or taxi drivers during vehicle conversion, potential loss of business because

WAVs might be less appealing to customers not confined to wheelchairs, or other effects on the local hospitality industry.

4. What has the PPA done to encourage medallion owners to voluntarily provide accessible service?

There are many ways for the PPA to encourage the implementation of accessible taxicab service – whether the need is found to be 30, 300, 1,600 or 2,000. The PPA's proposed regulation has chosen perhaps the least

elegant of these options, namely arbitrarily choosing to convert the entire fleet and mandating that every existing service provider comply. We believe that this mandate might have many unintended consequences that might not be legal.

We strongly prefer that the PPA consider incentives that encourage medallion owners and drivers to provide accessible service. Thus far we have seen little evidence that the PPA has done much, if anything, to encourage

accessible service. In fact, one dispatcher is still waiting for the PPA to approve several items it needs to

provide accessible or green taxi service, exclusively.

We believe that the PPA should consider some or all of the following incentives to encourage the implementation of accessible services:

- Waiving or modifying the maximum mileage requirement for WAVs to allow owners to amortize the cost of these more expensive vehicles over more miles;
- Lowering or eliminating the PPA's assessment on medallions attached to WAVs;
- Providing zero or below-market-rate interest loans for WAVs;
- Subsidizing collision insurance for WAVs;
- Working with the airport to allow each WAV to by-pass the taxi line once per shift to offset the loading and unloading time associated with providing accessible service;
- Working with SEPTA to integrate accessible taxis into its paratransit service, putting more people into the back seats of taxis;
- Developing a training program for accessible drivers and offering that program at no cost to the drivers;
- Paying drivers to attend accessible training courses; and
- Waiving the driver renewal fee for drivers who earn an accessible service endorsement.

GPhITA is certain that there are other potential incentives that the PPA could offer within its current constraints.

Only after such actions to encourage voluntarily provided accessible service have been tried and failed should the PPA impose mandates.

5. What do other cities do?

Without conducting extensive research, GPhITA believes that the PPA's approach to WAV implementation is

unusual, if not unique, among US cities. GPhITA would gladly assist the PPA to convene a working group that

compares WAV regulations and programs in other cities to come up with a set of best practices. We have done

a quick review of mandates and incentives regarding accessible service and found the following.

Chicago:

- o Requires all dispatch companies to participate in coordinated dispatch system for WAVs;
- o Requires 2 WAV-trained drivers per WAV;
- o Requires owners with more than 20 cabs to maintain at least 5% as accessible vehicles;
- o Established an industry-funded wheelchair accessibility vehicle fund to reimburse and incentivize the industry to place more than the mandated 5% wheelchair accessible taxicabs into service;
- o Provides an incentive for wheelchair accessible vehicles of \$100 off of the annual \$600 medallion fee;

Los Angeles:

- o Requires owners of 15-49 medallions to have one WAV, of 50-74 to have 2 WAVs, of more than 75 to have one WAV per 25 medallions
- o Allows WAVs to remain in service one year longer than non-WAVs
- o Allows WAVs that are 6 years old to be placed into service as taxis, versus 4 years for non-WAVs

Boston:

- o Requires that a "suitable number" of wheelchair accessible taxi vehicles be available at all times within the City of Boston.
- o Gives the Police Commissioner, who serves as the head of the Hackney Unit, authority to approve a set number of designated WAV taxi medallions.
- o Requires dispatchers to keep a log of the time and the location where "each patron using a WAV taxi was used in its specially designed capacity as a wheelchair accessible vehicle"
- o Requires coordination of dispatch for WAV taxis
- o Requires only that WAV vehicles meet "the Americans with Disabilities Act specifications for Wheelchair accessibility," which stipulate neither rear- nor side-entry.

□ New York City:

- o Recently announced an auction of 2,000 WAV-only medallions
- o Requires extensive driver training program

□ San Francisco, CA

- o Mandates extensive driver training program for WAV taxi drivers
- o Requires that each WAV taxi make at least 8 pickups of wheelchair passengers per month
- o Requires coordinated dispatch, including response time goals and record-keeping of all WAV taxi requests

In sum, no other city that GPhITA has surveyed currently requires that its entire fleet be composed of WAVs.

No city requires anything close to the 18.75% accessibility by 2013 as mandated in the PPA's proposed regulation. And no other city we have surveyed requires that WAVs meet any standard beyond those stipulated in the ADA.

6. Is the proposal legal?

Taxi service is exempt from the Americans with Disabilities Act (ADA). We see no mention of accessible service in Act 94 that gives the PPA authority to impose accessible service rules beyond those of the ADA. We know that taxi regulators in other cities have been denied the ability to impose mandates regarding the adoption of green taxis because of federal preemption. We are aware that the PPA is currently in court fighting a lawsuit

regarding the provision of accessible taxi service. We believe that the PPA needs to address the threshold issue

of whether it has the authority to mandate (versus encourage) accessible service. We do not believe that a

settlement between the parties in the pending lawsuit between the PPA and the disability rights community

somehow allows the PPA to mandate accessible service.

Further, the method chosen to begin the implementation of the mandate, the lottery, is arbitrary and capricious.

The PPA proposal contains more language about the lottery than anything else. There is no definition of

accessible trips or incentives for accessible service. There is nothing that protects a taxi service provider from

needing to replace a newly purchased vehicle. There is nothing that compensates those forced to shift early for

their extra expense.

We hope to be afforded an opportunity to comment on this matter after the PPA does the requisite legal research

and issues and opinion.

7. What unintended secondary affects might this proposal have on the industry, passengers and the City?

The PPA needs to consider much more than accessibility when promulgating regulations. Are accessible cabs

as environmental as other cabs? Do accessible cabs provide the same level of comfort to passengers not using

wheelchairs as other passengers? What is the cost of mandating accessible service universally on all customers,

on the City's tourism and on low-income users of cab service? Regulation needs to consider the public interest

of all and not the special interests of particular group of stakeholders at the expense of others.

We need to ensure that by mandating complete fleet conversion to WAVs, that the PPA does not unintentionally

impose inferior cab service that exacerbates air pollution. A uniform approach may not be the best solution for

the variety of passengers that utilize taxis. For example, seniors or others not in wheelchairs but who have ambulatory challenges may find it very difficult to use accessible cabs, whether retrofitted vans that have a higher step to negotiate than sedans or other configurations such as MV-1s. Getting into the rear seats of a vehicle such as the MV-1 may be challenging to many taxi users. We are not aware of any research done in Philadelphia or considered by PPA before proposing a regulation that mandates that all cabs must be accessible.

The lottery is an ill-conceived way of shifting an industry from one standard to another. First it unfairly imposes different standards on different members of the industry based upon the arbitrary and random outcome of the lottery. In a market as fragmented as Philadelphia's there needs to consideration of the differential impact the mandate would have on large versus small medallion owners. Philadelphia's medallions are dispersed among 685 ownership entities. About 60% are owned by entities that control an average of 2 medallions or fewer, while 40% are owned by entities that control an average of 29 medallions. The larger owners may be able to absorb the impact of rapid WAV conversion, but the smaller ones may not. Consideration must be given as to whether the lottery method will negatively impact the value of certain medallions during this phase – pushing them underwater on their loans. It might select medallion owners who do not have access to capital. It might select medallions affixed to newer cabs with lots of useful life including newly introduced hybrids and accessible cabs.

Further, we are concerned that this proposal will only widen the gap between what the PPA is able to require of Partial Rights cabs and Medallion cabs. We concur with the PPA that all service in the city should be held to the same standards. The PPA has had a hard time getting Partial Rights cabs to have in-cab technology that allows it and its owners to track the vehicles and protect against theft of service from medallion operators. Will the PPA be able to mandate the use of accessible vehicles by Partial Rights cabs or will the gap widen to the detriment of the riding public and Medallion cabs and their drivers?

In conclusion, GPhITA agrees that rapidly increasing the number of WAVs in Philadelphia's taxi fleet is a laudable goal and must be pursued. However, the PPA's proposal goes too far too fast and amounts to a massive unfunded mandate on the industry. Its method of initial implementation, the lottery, is arbitrary and will have grossly disproportionate impacts on medallion owners, operators, and drivers, to say nothing of its cost and impracticality. GPhITA believes that the PPA has an obligation to do its due diligence, which starts with engaging industry stakeholders in a meaningful dialogue about significant changes to regulations, ideally before they are promulgated. GPhITA urges the PPA to engage in that dialogue immediately, to begin an inclusive and thoughtful regulatory process that provides answers to questions raised herein. We urge the PPA to withdraw this proposal and work with industry stakeholders and the disability rights community to quantify

the need for accessible service and develop meaningful incentives such as those discussed above to encourage

the voluntary provision of this service by the taxi industry.

Submitted by:

Jeff Hornstein Date: Thursday, 02 February 2012

Executive Director

Greater Philadelphia Taxi Association

¹ <http://www.fueleconomy.gov/feg/bymake/VPG2012.shtml>

² http://www.fueleconomy.gov/feg/bymodel/2012_Toyota_Sienna.shtml

Comments of Fran Fulton 2/2/2012

I am pleading, a wheelchair citizen please approve the proposed regulations to allow

many more accessible cabs. traveling through philly has become such a problem for the disabled. this new mode of transport would be vital plus an added resource for the disabled community as a whole. please hear our voices, and do the right thing by

passing this proposal. we thankyou, please have a great day!

Comments of AJ Nanayakkara 2/2/2012

Dear Mr. Milstein,

I am emailing to express my strong support for regulations making Philadelphia's taxi cabs wheelchair-accessible. Transportation is a key part of helping people access school, work, and social activities, and many Philadelphians utilize taxi cabs daily for these purposes. However, many disabled Philadelphians are relegated to the choices of waiting on a cold street corner for a bus or staying at home.

As the founder and Executive Director of the Global Abilities Foundation, I have traveled to four continents to help individuals with disabilities become more engaged in their communities. But as a person who is paralyzed and uses a wheelchair, I have experienced first hand the challenges facing wheelchair users in my own home town of Philadelphia. In my travels around the US and to other countries, I have used wheelchair-accessible taxis that are common and part of successful taxi businesses. It is a shame that Philadelphia does not offer this service! We are a large city that showed the rest of the country how to be free, and it is a shame that we still limit freedom of access to a significant portion of our population. I hope that we can help fix this by passing legislation to make our taxis wheelchair accessible.

Thank you,

AJ

--

Best,

AJ Nanayakkara

Global Abilities

www.globalabilities.org

aj@globalabilities.org

215-205-3076
215-710-8161 (fax)

Comments of Rebecca S. Williams 2/2/2012

Good Afternoon:

I am sending this email to indicate my support of the PPA proposed regulations that would require 20%, or 300, of the 1600 existing taxicabs become accessible 90 days after the effective date of the final regulation AND 100% of taxicabs become accessible by January 1, 2016. Having traveled with people with mobility impairments I have personal experience of waiting for up to 2 hours for an accessible vehicle to take us to our hotel from an airport. This is not only extremely frustrating but also discriminatory when non-disabled people can hail a cab within minutes. People with disabilities have money, travel and are entitled to the same rights as others.

Please support these proposed regulations.

Rebecca Williams

Information Specialist - Training & Technical Assistance - Southeast ADA Center

Burton Blatt Institute (Atlanta Office)

www.adasoutheast.org

Syracuse University

1419 Mayson Street

Atlanta, GA 30324

t 404.541.9001 (v/tty); 1.800.949.4232 (AL, FL, GA, KY, MS, NC, SC, TN)

f 404.541.9002

email rwsill04@law.syr.edu website <http://bbi.syr.edu>

Twitter <http://twitter.com/BBISyracuse>

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Fax

If you do not receive all pages, or receive this fax in error, please contact the sender at (215) 634-2000 voice, (215) 634-6630 TTY, or (215) 634-6628 fax.

Date: January 27, 2012
To: Charles Milstein
Agency: Taxicab & Limousine Division, PPA
Fax #: 215 683 9437
From: Nicholas Allin, Executive Assistant
Subject: Comments on Wheelchair Taxicab Reg
Pages including cover: 10

Comments:

These comments on the proposed regulations are from Consumers who do not have access to email.

Thank you.

The information transmitted in this fax is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited.

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: Mrs. Carol Patricia Andrews-
Address: Applebee shelter
BOLD street ^{VOCOS} CHERRY ST - Gardner
Philadelphia, Pa PA 191-

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: Alice Redman
Address: 622 E. Carver St
Phila. Pa. 19120

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: Rochelle W. Fields

Address: 3731-n-park Ave

Phila PA 19140

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name:

Address: Centionette Boswell

3437 W. Wylou St - 19131

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name:

Address: Charita Mott

2991 W School House Ln
Phila, PA 19144

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: Tameka Cate

Address: 2715 Titon

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name:

Address: James Fort

113 E MARY

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name:

Address: Shond Hoppe

6143 Wheller

Feb. 1. 2012 11:41AM



Liberty Resources Inc.
Independence for Everyone.

714 Market Street, No. 2551, 1/F
Philadelphia, PA 19106

Fax

Comments Sent by

If you do not receive all pages, or receive this fax in error, please contact the sender at (215) 634-2000 voice, (215) 634-6630 TTY, or (215) 634-6628 fax.

Date: February 1, 2012
To: Charles Milstein
Agency: Taxicab & Limousine Division, PPA
Fax #: 215 683 9437
From: Nicholas Allin, Executive Assistant
Subject: Comments on Wheelchair Taxicab Reg
Pages including cover: 8

Comments:

These comments on the proposed regulations are from Consumers who do not have access to email.

Thank you.

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I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: Carol Johnson

Address: 1754 E Fulpenwood Ken St
Phila Philadelphia PA 19138

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: Matthew Clark

Address: 1335 Fitzwater St
Apt 204
Philadelphia, PA 19147

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: Morgan Jennifer Heino

Address: 801 Locust St

Apt 308

Philadelphia, PA, 19107

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: DERRICK MASON

Address: 6243 Delancey Street

Philadelphia PA 19143

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: Sherry Letteroff
Address: 158 N 23rd Street
River side Proseey apt
Phila PA 19103

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: MARYlou ALICIA Goodman
Address: 7212 HAVERford Ave Apt A2
Philadelphia PENNA. 19151

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: Antonio Cancel

Address: 3002 Mario Lanza Blvd. Apt. 0
Philadelphia PA 19153

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: Uenorio Torrence

Address: 931 N 63rd St Apt A2
Phila PA 19151

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: ANGELIQUE GREEN

Address: 453 S. 60TH STREET APT #2

Philadelphia

PA. 19143

267 592 9596

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: SHARON WASHINGTON

Address: 6541 N. Smedley St.

Phila, Pa 19126

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: James Sumpter

Address: 4429 N. 19th Street

Philadelphia, PA. 19140

I support PPA's proposed regulations for more accessible taxicabs in Philadelphia. Disabled people have the same right to this form of transportation as anyone else does.

Name: Paulette Carr

Address: 5305 Webster Street

Philadelphia, Pa. 19143

Comment of Timothy Peterson 2/2/12

Dear Mr. Milstein,

As an advocate for those with physical disabilities I am not only in favor of accessible cabs in Philadelphia I am also in favor of trained dispatchers, drivers, and owners of accessible taxi cabs.

It is my belief that these cabs not only need to be certifiably safe but all parties involved need to be trained at least once in how to properly treat and relate to the clientele involved. It would be prudent to involve the clients in this training so that they can serve the involved parties by helping them understand how to best serve the clientele for each riding experience.

Thank you for your service and for your time.

Sincerely,

Tim
Timothy K. Peterson

Administrative Care Manager @ Inglis Care Management
2600 Belmont Avenue
Philadelphia, PA, 19131
Telephone: 215.581.0777
Fax: 215.878.1013

Our Mission: “Inglis enables people with disabilities – and those who care for them – to achieve their goals and live life to the fullest.”

Comment of Lillie M Wilson 2/1/12

4931 N. 11th Street
Philadelphia, PA 19141
February 1, 2012

Philadelphia Parking Authority
2415 S. Swanson Street
Philadelphia, PA 19148

Dear Sir or Madam:

I am writing in support of the Philadelphia Parking Authority’s proposal of putting 300 accessible cabs on the city streets by the end of 2012. I am the caretaker of my daughter who has M.S. Sometimes we are limited in traveling around the city and there can be long delays with paratransit. Having accessible cab service is a vital opinion. Thank you.

Sincerely,

Lillie M. Wilson
Lillie M. Wilson

Comment of Lisa Aquila 2/2/12

Hello

I am a home care worker for a disabled female with cerebral Palsey. She and other disabled wheelchair users need accesable taxis in Philadelphia. Now! Did you know in order for her to obtain a non medical ride she must use the shared ride program from cct. They require a 24 notice and if you have a ticket to a show

you run the risk of being late. A perfect example of this : She and I attanded a show at the Merium theater "Traces" and had to use cct the show tickets were \$30.00 and she is on low income it took her a long time to save for her ticket and we were late to arrive because of picking up and dropping off other wheelchair users at different locations.

Also the return ride home took 2 hours from center city to her home in Northeast Philadelphia . The right to choose a cab should be available to disabled persons.

A rare treat to a show should not result in exhaustion and her only means of transportation resulted in just that. The city of Philadelphia needs accesable cabs so that our disabled community can fully enjoy what the city has to offer. Also, in the event of a medical or family emergancy no one should be restricted to a 3 day advance transportaion appointment. Lets give everyone equal respect to make choices and select their means of transportation.

Do not limit those with limitations in mobility to travel as they wish,when they wish, and to travel alone if they so choose not with strangers

.Freedom to choose is their constitutional right!!

Thank You ,
Lisa Aquila (home Care worker through Liberty resources)
4620 Melrose st.
Phila Pa.19137

Comment of Maria Dewan 2/2/12

I'm writing in support of wheelchair accessible taxis in the City of Philadelphia.

As a wheelchair user, having accessible taxis will give me more transportation options. With more transportation options, I am more likely to patronize the businesses and restaurants around the city.

Thank you for your time.

Maria Dewan
Philadelphia, Pennsylvania

Comment of Judith S. Madison 2/3/12

Dear Mr. Milstein,

As an employee of MossRehab Hospital which services Philadelphia's disabled community, I strongly support the PPA's proposed regulations to make Philadelphia's taxicabs accessible to people who use wheelchairs or have other mobility issues.

Thank you for your attention to this matter.

Judith S. Madison, MSW, LSW
Social Worker, Medical Management Coordinator
MossRehab at Aria-Frankford
215-831-2415
215-831-2117 – fax

Comment of Ann Klienschmidt 1/3/12

TO WHOM IT MAY CONCERN

The Disabled citizens of Philadelphia need Accessible Taxicabs ASAP. We want the ability to go to the doctors without 3 days notice, go out for an evening on the spur of the moment or get to work on time. Please help us make this dream a reality.

Thanks.

Ann Kleinschmidt
Philadelphia, PA 19127
