



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

I. Introduction: Freedom Taxi – The City's Only All Accessible or Green Taxi Dispatcher

These comments to the PPA's current proposed regulations mandating that all of Philadelphia's Medallion and Partial Rights cabs be accessible are filed by the Freedom Taxi Association (Freedom or Freedom Taxi) and Philadelphia Taxi Management (PTM). Freedom Taxi is Philadelphia's first and only dispatcher committed to dispatching only accessible or green vehicles. Freedom Taxi was able to make this bold pledge because its owners also own, control or manage over one hundred medallions in the City through PTM. Freedom Taxi took this public interest oriented move, while noting we need certain operating accommodations to make our voluntary pledge viable and sustainable. Freedom's and PTM's owners are also leaders in providing accessible service in New York and Chicago.

Even with our small but growing fleet of accessible cabs, we have met almost every request for accessible taxi service within ten to fifteen minutes. As we add our third and fourth new Toyota Sienna's into service, we continue to work with the Taxi and Limousine Division to provide clearer definitions of accessible service, accessible vehicles and the training of drivers of accessible vehicles. We had the TLD invited to an accessible service driver-training program we located for our drivers and have assisted in the accessible service certification of ten Philadelphia taxi drivers.

We note that although in constant discussion with the PPA staff on issues related to accessible service, we were never consulted about this proposed regulation. We believe that stakeholder input is best garnered through working sessions rather than through formal comments and hearings. Although we strongly support additional accessible cab service in Philadelphia, the proposed regulation seems destined to be derailed by regulatory and legal challenges.

II. Road Map to Successful Wheelchair Accessible Taxi Service

Freedom Taxi & PTM wish to work with the Philadelphia Parking Authority, stakeholders and the affected community to establish a robust set of regulations and implementation plan for the deployment of wheelchair accessible taxis. We have listed an initial outline of the steps we recommend, below.

1. Establish an industry/stakeholder working group to address the challenges of accessible service including differentiating accessible taxicab service from paratransit service.
2. Engage consultant(s) to analyze the need and the long-term financial sustainability of accessible cab service under various approaches designed to meet the need. The financial analysis should consider issues such as the costs of vehicles and equipment, insurance, training and financing, economic dislocations (e.g., lost or gained revenues or effect on individual carrier or driver) and the need for economic incentives.
3. Develop standards for accessible vehicles that assess tradeoffs between ease and safety of access, air quality and quality of service to those not confined to wheelchairs. *(Freedom Taxi would like to note that the current regulation proposal would eliminate existing WAV's from Freedom's fleet which are "NEW" rear entry Sienna's. Freedom has made a large capital investment in these vehicles which have been approved by the PPA. Our research and experience in other markets has proven these vehicles most reliable and suitable for the riding public. We ask that these vehicles be permissible for use)*
4. Develop training standards, requirements and delivery approaches related to the provision of accessible service (including continuing education) for drivers, dispatchers and owners/managers.
5. Explore a unified payment solution for passengers who rely on government subsidies for accessible service.
6. Develop a data collection system related to accessible service to enable the creation of performance-based incentives.
7. Develop a public information campaign including public service announcements to inform the public of the availability of accessible service.

We strongly support increasing the number of accessible cabs into service, but there are superior market driven approaches to this mandate that seems destined to fail regulatory review process and legal challenges. As our original petition and actions have stated, Freedom Taxi and PTM are committed to a fleet of accessible or green vehicles. We offer our time, efforts, resources and knowledge of other market approaches to accessible taxicab service in which we have participated. We feel that our approach will help the

industry, stakeholders and regulator create a long-term successful solution and speed the addition of accessible service in Philadelphia.

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