

CLERK

AUG 15 2024

PHILADELPHIA PARKING AUTHORITY
TAXI AND LIMOUSINE DEPT

BEFORE THE PHILADELPHIA PARKING AUTHORITY
TAXI AND LIMOUSINE DIVISION

Re: Petition to Establish a Pilot Program

Dated: August 14, 2024

Docket No.: P-24-08-01

PETITION OF RASIER-PA, LLC

1. Petitioner, Rasier-PA, LLC¹ (“Petitioner”) a licensee of the Philadelphia Parking Authority Taxi and Limousine Division (“PPA” or the “Authority”) respectfully submits this Petition pursuant to 52 Pa. Code § 1005.21 and § 1005.23 requesting the Authority enact rules, establish a pilot program, or otherwise authorize the referral of trips from the Uber App to Authority licensed Taxicabs.
2. Petitioner has a partnership with approved taxicab smartphone app operator Curb Mobility, LLC (“Curb”). Under this partnership, Petitioner, its affiliates, and Curb offer Uber App users the ability to request trips completed by taxicabs.
3. Petitioner seeks authorization from the Authority, via the implementation of a Pilot Program or other rulemaking, to provide Uber App users within Philadelphia the ability to request that their trips be completed by licensed taxicabs.
4. If authorized, the Uber App would present riders with (i) Uber’s generally utilized menu as it so determines, and (ii) a Taxi option resulting in a referral to a taxicab via Curb’s dispatching system.
5. Riders selecting a Taxi option will see an upfront fare for the taxi trip just as they do for TNC trips requested through the Uber App. These Upfront Flex-Fare Prices are authorized under Authority Order 22-001.²
6. If authorized, the Uber App will also be able to direct Riders selecting “regular” Uber rides (currently UberX and Share) through the Curb dispatching system utilizing the Upfront Flex-Fare Prices authorized under Authority Order 22-001. These rides would be integrated into routine Uber service and are “Integrated Trips”.

¹ Rasier-PA, LLC is a technology company that licenses a smartphone application, which includes a driver application and a rider application (“Uber App”). Rasier-PA, LLC is a wholly-owned subsidiary of Uber Technologies, Inc, and operates as an authorized Transportation Network Company in Philadelphia.

² <https://philapark.org/wp-content/uploads/Authority-Order-22-001-Upfront-Pricing.pdf>

7. There will be no referrals of riders under Authority Order 22-001 for riders seeking special vehicle features or accommodations, such as requests for luxury vehicles or pet friendly vehicles through the Uber App.
8. Once a trip is designated for referral, whether as a Taxi trip or an Integrated Trip, Curb sends the dispatch to a taxi driver through its E-Hail dispatch system. This system works in lockstep with PPA licensed dispatchers and the individual taxi drivers can decide whether to accept the referred trip.
9. Drivers interested in receiving referrals through this program will opt-in directly with Curb and receive referrals through equipment already installed in authorized taxicabs. Drivers are not required to accept any referred trips.
10. All relevant taxes, surcharges, fees, and assessments applicable to taxi trips are included in the upfront fare. For the avoidance of doubt, any trip referred by Petitioner to an authorized taxicab driver would be deemed a taxi trip for purposes of compliance with PPA rules and regulations.
11. Petitioner submits that a pilot program would increase trip volume and fares for taxi drivers. By referring trips to Curb, drivers can access a larger pool of potential riders, ensuring more consistent and profitable work.
12. A pilot program may also boost revenues for medallion owners. The increased trip volume resulting from trip referrals may lead to enhanced medallion values providing for greater financial stability throughout the industry.
13. Likewise, Authority licensed Taxicab Dispatchers will experience a surge in volume, enabling them to optimize their operations and service more riders efficiently. This increased activity will contribute to a more vibrant and competitive taxi industry in Philadelphia.
14. Petitioner has obtained letters of support from Curb, the TLD licensed dispatchers Philadelphia Taxi Service and 215 Get a Cab, as well as TLD licensed drivers affiliated with 215 Get a Cab. These letters are enclosed herein for your review and consideration.

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Respectfully Submitted,

Dated: August 14, 2024

[Enclosures]

By: 

Nicholas Davoli
175 Greenwich St.
New York, NY 10001
Attorney for Rasier-PA, LLC
ndavoli@uber.com



August 14, 2024

To the Taxi and Limousine Division,

As you know, Curb Mobility works for Philadelphia drivers and dispatchers to manage an electronic distribution program for taxi rides. While we are not a licensee of the Division, our operations are expressly permitted by orders of the Authority, and we work with the vast majority of Philadelphia taxi drivers and dispatchers.

From payments to dispatch, Curb has been delivering innovative solutions for Philadelphia's taxi fleets and drivers since 2005. The Curb App has created new earning opportunities for drivers when the industry was impacted by competition from ride-share companies. In our continued commitment to maximizing value for drivers, we have launched Curb Flow, a system that aggregates ride requests, such as fleet dispatches and app bookings, from multiple demand sources (including Uber) to increase drivers' earnings. This initiative also aligns with Curb's commitment to advancing a more professional and regulated on-road service to riders.

We write in full support of Raider-PA, LLC's petition for the referral of trips from the Uber App to our drivers in Philadelphia via the Curb Flow system. This program has the potential to support drivers and medallion owners dramatically.

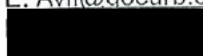
If approved, the proposed referral system will help bring more business, rides, and opportunities to the declining Philadelphia taxi industry. We have demonstrable success with Uber-referred taxi rides in numerous jurisdictions nationwide. In our experience, we have observed that a separate "Taxi" option in the Uber App has created a positive impact by surfacing taxis as an option for Uber users. However, the actual multiplier effect on the taxi industry is realized via a fully integrated model - the selection of Uber X or Taxi for an Uber passenger based on the closest ETA. This integrated model generates more earnings for drivers while delivering a better passenger experience.

We're grateful for the Division's willingness to consider this proposal. We've seen similar initiatives in other localities stabilize and revitalize the taxi industry, bringing drivers back behind the wheel of taxicabs. We're hopeful that our proposal will have a similar positive impact in Philadelphia, and we strongly urge the Authority to adopt it promptly.

We are available to answer any questions you may have about our experiences in other markets, our support for this proposal, or any other related issue.

Thank you,

Avi Itzhakov
Chief Operating Officer
E. Avil@gocurb.com



Curb Mobility, LLC

gocurb.com
11-11 34th Avenue
Long Island City, NY 11106

Philadelphia Parking Authority (PPA)
701 Market St #5400
Philadelphia, PA 19106
Ladies and Gentlemen,

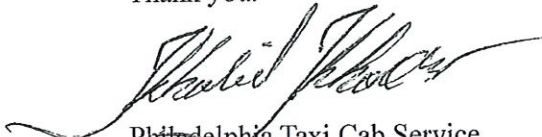
We, Philadelphia Taxi Cab Service, one of the largest taxi dispatch operators in the City of Philadelphia, fully support the effort to bring more business, more rides and more opportunity to the declined Philadelphia taxi industry. We support receiving booking rides via our authorized taxi technology from any third-party company / contracted agencies, including Uber, Lyft, Curb or any other contract provider.

Additional taxi trips through our taxi technology system will help revitalize the taxi industry and bring drivers back behind the wheel of Philadelphia's taxi cabs.

We are fully supportive of "upfront" agreeable ride pricing to taxi riders and to taxi drivers, which will provide the transparency needed to enhance the industry into the future.

We welcome the opportunity to discuss this very important initiative.

Thank you.



Philadelphia Taxi Cab Service

215 GETA CAB

Philadelphia Parking Authority (PPA)
701 Market St #5400
Philadelphia, PA 19106
Ladies and Gentlemen,

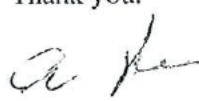

215 Get a Cab fully supports the effort to bring more business, more rides and more opportunity to the declined Philadelphia taxi industry. We would like to receive booking rides via our authorized taxi technology from any third-party company / contracted agencies, including Uber, Lyft, Curb or any other contract provider.

Additional taxi trips will help revitalize the taxi industry and bring drivers back behind the wheel of Philadelphia's taxi cabs.

We are fully supportive of "upfront" agreeable ride pricing to taxi riders and to taxi drivers, which will provide the transparency needed to enhance the industry into the future.

We welcome the opportunity to discuss this very important initiative.

Thank you.

 / GENE STERIN/


215 Get a Cab

Philadelphia Parking Authority (PPA)
701 Market St #5400
Philadelphia, PA 19106

Ladies and Gentlemen,

We support receiving E-hail ride offers via our authorized in-vehicle taxi technology from any third-party providers, contracted agencies public or private, and through any partnerships through Curb including TNC partners such as Uber.

Additional trips through our taxi technology system will help revitalize the taxi industry and bring drivers back behind the wheel of Philadelphia's taxi cabs, by increasing our opportunities to help increase our potential earnings.

We are also fully supportive of upfront dynamic pricing agreeable to both taxi riders and drivers, which will provide the transparency needed to enhance the industry into the future.

Thank you.

215 - Philadelphia Taxi Driver

Name / Taxi License Number

H 100 729

Signature

J Brahim Cisse

Date

08-13-2024

Philadelphia Parking Authority (PPA)
701 Market St #5400
Philadelphia, PA 19106

Ladies and Gentlemen,

We support receiving Ehaul ride offers via our authorized in-vehicle taxi technology from any third-party providers, contracted agencies public or private, and through any partnerships through Curb including TNC partners such as Uber.

Additional trips through our taxi technology system will help revitalize the taxi industry and bring drivers back behind the wheel of Philadelphia's taxi cabs, by increasing our opportunities to help increase our potential earnings.

We are also fully supportive of upfront dynamic pricing agreeable to both taxi riders and drivers, which will provide the transparency needed to enhance the industry into the future.

Thank you.

215 - Philadelphia Taxi Driver

Name / Taxi License Number

418008 Toai Nguyen

Signature

Toai Nguyen

Date

AUG. 13. 2024

Philadelphia Parking Authority (PPA)
701 Market St #5400
Philadelphia, PA 19106

Ladies and Gentlemen,

We support receiving Ehaul ride offers via our authorized in-vehicle taxi technology from any third-party providers, contracted agencies public or private, and through any partnerships through Curb including TNC partners such as Uber.

Additional trips through our taxi technology system will help revitalize the taxi industry and bring drivers back behind the wheel of Philadelphia's taxi cabs, by increasing our opportunities to help increase our potential earnings.

We are also fully supportive of upfront dynamic pricing agreeable to both taxi riders and drivers, which will provide the transparency needed to enhance the industry into the future.

Thank you.

215 - Philadelphia Taxi Driver

Name / Taxi License Number

Daniel Mleny 1002646

Signature

[Handwritten Signature]

Date

8-13-24

VERIFICATION

DAVID TEMPLE, Attorney for Rasier-PA LLC verifies that he is acquainted with the facts and information set forth in the foregoing pleadings are true and correct to my knowledge, information and belief. I expect to be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.



DAVID TEMPLE

DATE: 8/15/24

BEFORE THE
PHILADELPHIA PARKING AUTHORITY

IN RE: Petition to Establish Pilot Program

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Petition to Establish Pilot Program was served electronically to the following parties on August 15, 2024.

TLD Clerk
Philadelphia Parking Authority
2415 S. Swanson Street
Philadelphia, PA 19148
TLDclerk@philapark.org

Christine Trzaska
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Philadelphia, PA 19102
ctrzaska@philapark.org

Dennis Weldon, Esquire
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Philadelphia, PA 19102
dweldon@philapark.org



DAVID P. TEMPLE, ESQUIRE

August 15, 2024