

September 9, 2013

Chair & Members
City of London Community & Protective
Services Committee

Dear Chair & Members of the Committee,

On behalf of the London Taxi Association, I would like to thank you for your support in bringing our concerns forward to a public consultation meeting. Our hope is to bring changes to the bylaws which will reflect the needs of our industry which will benefit our clients and those involved in delivering the service. As you are aware, the Taxi industry is enduring pressures which can be reduced by the changes we are advocating. I would also like to give special thanks to Mr. Orest Katolyk, Manager of Bylaw Enforcement for the City of London who oversees the industry and let this committee know that Mr. Katolyk has been very helpful in understanding our concerns and it is reflected in some of the recommendations before you.

I will proceed to comment on the recommendations placed before you. We agree with some but feel that some others have been missed and others require slightly different wording.

1. Demerit Points

We agree with the recommendation placed before you and support its implementation.

2. Vehicle Entry Age

We came before this committee asking for what is being presented by Mr. Katolyk. We were of the opinion that **Hybrid** vehicles are the future of taxi services. We still believe this wholeheartedly. Upon our further review, the cost of **Hybrid** vehicles are still at a point where the cost is much more than the standard vehicles we run today with the vast majority being Ford Crown Victoria's'. We would respectfully ask that we be allowed to continue the use of Crown Victoria's until the supply is such that they are no longer available. As you may be aware, Crown Victoria's are no longer being produced but as in the past we have been able to purchase these cars after they have been placed for sale by police services in cities which still use them such as the London Police Service, among others in the province. We ask that we only be allowed to use this type of vehicle for the next five years since we feel by that time we can focus on all vehicles being placed in service as being **Hybrid**. I want to stress that we will still continue to place high priority on **Hybrid** vehicles, but it will allow some flexibility to those who find the current pricing to be prohibitive.

3. Broker Records

We had asked that this issue regarding broker records be done away with. The reason for this is the ability to have all this information stored at a central location which is what occurs now. All information can be called up at anytime via the computer system which all dispatch services provide. Our industry has focused on having this type of system in place since there can be no tampering of records and a quick search of any information can be almost instantaneous. The information that is sent back to the dispatch regarding fare totals should be excluded from being sent to central dispatch and the brokers since this information is considered personal and the only entities that should be privy to this information are the drivers and the CRA, (Canada Revenue Agency). We consider this information being disseminated as an invasion of privacy.

4. Hours on Duty

Although the report from Mr. Katolyk advocates for a 12 hour maximum work day, when we were last before this committee we had asked that the times for driving be similar for those who drive trucks which is 14 hours. Even though a driver will be on shift for up to 14 hours, much of that time is spent waiting for fares. It is conceivable that a driver will not have a fare for upwards of 4 hours or more. Within that time they are not driving but are parked waiting for a call. Most drivers take time off and go home to rest and then go back on the road when it is deemed to be busier.

5. Trip Sheets

As was stated at our presentation this past June, trip sheets inside vehicles are a major safety issue with all drivers. The information contained on them can easily inform someone looking to “rob” a driver of how much money could be in the cab if they glance at the records contained. The City of Toronto and other jurisdictions have done away with this practice and we ask you to do the same in order to help in the protection of those whom deliver the service. Independents will still require this since they have no central dispatch system.

6. Fare Fraud

We are in agreement with the information provided on this issue by Mr. Katolyk.

7. Life Cycle of Limousines

Since our request for **vehicle entry age** seems as though it will be granted and includes limousines in the recommendation, we feel that it is only fair to include vehicles destined for service in the taxi industry on this issue also. We formally request that you allow for this to occur for all cars being placed into taxi service as well.

8. Insurance Wording Changes

As you are aware, insurance is becoming a large problem for the industry in the sense of heavy costs. We have a request to change some wording which we have already discussed with Mr. Katolyk and require the committee to direct this. The wording changes will help the industry reduce costs by approximately 20% to 33%. Please note that rates will still rise but not as much as was initially anticipated due to the solution you can help us with which is presented here.

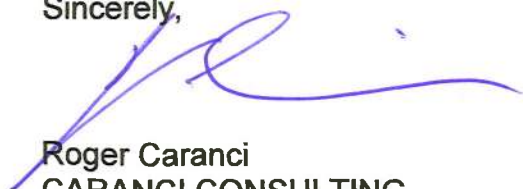
9. Fee for Taxi Cleanup (Biological Hazard)

We discussed this at our June presentation before committee and it seemed to be overlooked in the direction to staff. You may be aware that the City of Woodstock has now implemented a "clean-up charge" if someone gets sick in a taxi. We believe strongly about this charge since a taxi could be "off the street" for anywhere from 1 to 3 hours and miss fares in this time which ends up costing the driver an opportunity to earn. We ask that you direct staff to author a bylaw such as that implemented by Woodstock, Ontario as soon as possible to go forward with the rest of these proposed changes.

Once again, I would like to take this opportunity to thank this committee and staff, especially Mr. Katolyk, for taking the time to hear our concerns and address them in the manner in which you have. We strongly believe that a new, positive attitude and mutual respect has been gained from this process and we look forward to building upon this in the future.

I would be glad to answer any questions that committee members or staff may have regarding this presentation.

Sincerely,



Roger Caranci
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On behalf of The London Taxi Association