



City of London Public Safety Committee

January 23, 2012

300 Dufferin Ave.
London, Ontario

Chair Denise Brown and Members of the Public Safety Committee:

Unfortunately, having recently reviewed the recommendation from the Director of Building Controls, Chief Building Official and License Manager, we have some grave concerns. Originally it was clearly stated by administration that their future direction and reason for the by-law review was to ensure three things as follows:

- Quality Service
- Availability of Service
- Safety and Consumer Protection

Instead, we are now dealing with a proposal that clearly satisfies a taxi industry that is not prepared to look at itself for improved opportunity, punishes the consumer and advantages taxi drivers by reducing competition.

Item #4 Security Cameras

Cameras were instituted based on pressure from the taxi industry to get their brokerages to provide this means of protection, and in order for them to be heard it became a forced issue from the City. We are pleased to work in conjunction with any of our brokers that feel more protected by the installation of a camera, and also see value in the ability of a forward facing camera to help in the re-creation of an accident. However, we believe these decisions should be that of the Management and Broker/Drivers of each individual firm, and not be mandated by the City.

Item #5- Taxicab Flat Rates

Commentary speaks to 40 years of long standing practice of flat rate pricing between fixed points as a reason to keep things the same for taxis, yet in Item #6 Hailing of Executive Limousines, 23 years of practice in being able to Hail an executive limousine is being changed.

Item #6 – Hailing of Executive Limousines

It is suggested in everything provided by Administration in this review that decisions are based on Public Participation, yet you clearly say in your commentary **“no member of the public or executive limousine customers have brought this issue forward as a concern”** furthermore and I continue to quote **“Staff have also received numerous public comments in support of *allowing* the public to hail executive limousines. In an effort to provide a clearer distinction between two types of vehicle for hire services, hailing as a PUBLIC CHOICE should only be permitted for taxicabs”**

Very simply Taxi drivers don't want us to hail (we are competition), the public wants us to continue hailing (they want to be serviced), yet to satisfy PUBLIC CHOICE taxicabs should be the only ones permitted to hail? If the PUBLIC was choosing, did you not just say they want executive limousines to hail? Clearly this item does not satisfy one of your core objectives

(Availability of Service) and must be changed. Moreover, Council has already been asked to vote on this twice and both times agreed that the public needs to have the ability to hail who they want. Please listen to the CUSTOMER. Apart from the fact that this provides significant inconvenience and hardship for our guest, it also creates a greater FINANCIAL hardship for our drivers in the hundreds of thousands of dollars. If executive sedan customers wanted a taxi they would be in one already. **Let the customer hail whatever provider they want (Quality Service, Availability of Service, Safety and Consumer Protection)**

Item # 8 Window Tinting

Executive Limousines in London all have a 20% tint. Any personal vehicle that has tint applied at Tint King or any other provider also puts on 20% tint unless specified. By-law review suggests a move to 35% which is the lightest tint available, has no value in esthetics and is not the industry standard. Furthermore there is a \$20,000 financial burden to my fleet to retrofit 23 years of practice. Suggesting that tint has anything to do with safety would be false. There is no regulation related to tint in the rear two windows, yet that is where the bulk of negative activity would or could take place. Tinting should be governed by a more clearly defined MTO standard and has no place in a Municipal by-law.

Item #11 Limousine Fares

Administrations commentary starts with "as noted in previous reports, the number one issue noted by the **taxi industry** is the differentiation of taxi and limousine fares". *Not the public, the industry!* It is unreasonable to make any of your review driven by the industry when all processes are deemed to be public participation initiated. Quoting from the BMA report of 2004, "**it was cited as one of the most contentious issues within the taxicab industry, but is NOT a concern of the customers as their focus (the customers) is on Service Quality and Value.**

Checker Limousine's current offering matches the expectation of the Customer. Service Quality and Value. Why then are we and our customers being punished with a need to charge more!

Any increase punishing our customers based on a taxi industries plea to make executive limousines uncompetitive and more specifically at the peril of fixed income families and seniors is plain wrong.

If our Brokers and Drivers needed more money we would have increased our rates already. Our people understand a tough economy and a need to treat people fairly.

Do the right, and the toughest thing. Address the reality that artificial plate values (\$120,000) on taxis have stripped the bulk of available profit from the taxi industry, and leave our customer out this. It's not our problem that we can operate a \$50,000 car and not have the financial woes the rest of the industry has. Administration fears the repercussions of taking on such a huge monster of potential legal proportion, don't make it our problem instead.

Too much administrative time and energy have been exhausted to appease the taxi industry. Competition is good for Quality Service, Availability of Service and Safety and Consumer Protection. Let the CUSTOMER decide.

Currently, the path that has been carved out by City Administration will lower the bar on service, availability and safety. I would strongly suggest that in order to prevent us from taking this stance to a larger platform, that **ALL** of the items proposed above go back to Administration for re-evaluation and come back to Public Safety Committee at a later date having given the review one focus only **THE CUSTOMER!**

Sincerely,

Brad Rice

General Manager

Checker Limousine