

November 7, 2016

Clr. Virginia Ridley
Chair, Community and Protective Services
Committee,
City of London

Dear Clr. Ridley,

I wanted to take a moment to thank you and your committee's attention and interest at last weeks PPM pertaining to the proposed Vehicle for Hire By Law. I also wanted to provide comment on the recommendations stemming from the meeting which Mr. Katolyk and staff have provided you this past Friday.

The London Taxi Association wants to re-iterate our position on a few of these issues which include the following;

1. Camera Requirements
2. Criminal Record Checks
3. Accessible Taxis
4. Role of City as Regulator
5. Fees

1. Our position on cameras is very clear for the safety of passengers and drivers. Since the inception of the use of interior cameras in taxis, the industry has noticed a large decrease in the number of violent and fraud type incidents. We understand clearly that the position of Uber is that they believe that since they know who it is that orders their service through an app they should be exempt from this type of regulation. We want to be very clear that we understand that they will know who one person is but the majority of the time the ride includes more than just the person that orders the service. This is the inherent fallacy of their argument, they do know who always gets into their vehicles.

Since the City of London is the regulator and you have the ability to order the use of cameras, there is a real potential liability to the City of London if you "water down" the regulation by not placing cameras in all vehicles for hire and an incident occurs that could have been prevented by the use of a camera safety system. We strongly urge the City of London to implement this safety precaution into all vehicles for hire.

2. Criminal safety checks are important to weed out potentially unsafe operators. The City of London requires many of it's employees to apply for and receive criminal background checks through the services of the London Police Service. We are of the opinion that this is the safest and most comprehensive way of acquiring these checks. This should be the standard way of acquiring a criminal background check and should not be changed.

3. We agree that accessible taxi's are an important part of the taxi transportation system. We agree that it would be best to have further dialogue with Mr. Katolyk to consider the expansion of the number of accessible taxi's on the street and reach a workable solution to this issue prior to the implementation date of the new by law which is March 1, 2017. We welcome the opportunity to discuss this arrangement further.

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4. The London Taxi Association has been diligent in forging a strong and mutually beneficial relationship with our regulator partner which happens to be the City of London. We understand the benefits of working together and strengthening the industry and providing better services to Londoners and those visiting the city for the first time. We are really London's Unofficial Ambassadors and we relish the role of introducing new people to our city. The City of London plays a major role in how we conduct business and protecting those we are entrusted to provide our service to. We strongly believe that the City of London should continue to play this role and we want to encourage this partnership as we move into the future. We are happy to continue to have the City of London as our regulator.

5. The London Taxi Association has never had an issue with the City of London fee structure. We are in agreement to continue the fee structure in place and want to make sure it is the same for all vehicles for hire. We believe in paying our way and will continue to do so but want to stress that all should be the same.

In conclusion, the taxi industry in London has been through very challenging times and has withstood various attacks from different "bandit" operators. We have never shied away from competition and would encourage it but rules and regulations must be fair and equitable and must be followed by all and not flouted by those who believe to be above the law. We respect the rule of law and respect London City Council's role in our industry.

We look forward to a bright future and trust that London City Council will implement a fair and equitable By Law which will be followed by all.

Sincerely,



Roger Caranci
Spokesperson & Consultant
London Taxi Association
rcaranci1@rogers.com