



BAROUDI  
LAW

September 7, 2018

VIA Email: [CPSC@london.ca](mailto:CPSC@london.ca)

**City Clerk's Office**

Room 308  
300 Dufferin Ave  
PO Box 5035  
London ON N6A 4L9

Dear City Clerk:

**Re: Proposed Amendments to Vehicle for Hire By-law  
Written Submission for Public Participation Meeting September 11, 2018  
Our File: 124**

---

I am the Lawyer for U-Need-A Cab Ltd. My Client has retained my services to review a potential action against the City of London in connection with a proposed amendment to the Vehicle for Hire By-law to remove the limits on the number of regular and accessible taxi plates. This letter is being submitted in advance of the public participation meeting scheduled for September 11, 2018.

Removal of the limits on the number of plates will have devastating effects on the industry, and especially on Class A taxi plate owners. As the City is fully aware, Class A plates are valuable assets. These plates may be sold and transferred to others, as well as passed down through an owner's estate after death. For more than five decades, Class A plates have been recognized as a valuable investment by the City and by owners. In many cases, these assets are an owner's only "nest egg" or source of retirement funds. Removal of the limits on the number of plates will immediately render these plates worthless on the open market. The impacts will be felt by the minority communities, who are overrepresented in the taxi industry.

It is very alarming that the City is moving so quickly on an issue that will have such serious and wide-reaching consequences. Before moving forward with removal of the limit, it is imperative that the City conduct the requisite studies, research, and analysis of impacts that will result. In addition to the impacts on Class A plate owners, there are many other policy and economic arguments for why the limit should remain. Proper regulation in this industry critical, which includes maintenance of the limits on regular and accessible taxi plates. We have reviewed the Report of Mr. Kotsifas and fully agree with the problems he has summarized that can result from deregulation, as well as the losses the owners of the Class A plates will experience.

Should the limits ultimately be removed, the Class A owners must be compensated accordingly. The question of compensation should form part of the City's background review of this matter prior to any decision being made by Council. Stakeholders should be included in that discussion.

There is certainly no urgency to remove the limits. Given the lack of urgency in comparison to the severe consequences that will result if the limits are removed, we expect that the City will take a thorough and considered approach to this matter. Failure to do so could give rise to an Application in the Superior Court of Justice to quash the amending by-law on several grounds, including bad faith.

We ask that the Committee consider these comments. Should any questions arise, please contact the undersigned.

Yours Truly,  
**BAROUDI LAW**



Analee J.M. Baroudi