



Toronto Taxi Alliance Inc.

26 December 2008

To: Licensing and Standards Committee

From: Jim Bell, President, Toronto Taxicab Alliance (TTA)

Reference: Agenda Item 18.4, Vehicle Branding and Continuous Registration of Vehicles in Ontario for Licensed Limousines

Dear Committee Member,

The TTA is an industry association for taxi plate owners and fleet operators. We have read the staff report and concur with many of the report's observations and recommendations.

The taxicab industry is currently burdened with a lack of availability of qualified used vehicles and this has resulted in increased capital costs for replacement vehicles. These problems directly stem from the Municipal Code 545, Section 140, Subsection "K" requirement that replacement vehicles must have a continuous registration in Ontario from the time of its original purchase.

The onerous taxicab vehicle "Ontario pedigree" requirement was imposed because of concerns that vehicles previously branded as salvage or irreparable could end up as taxicabs in Toronto. When the By-law was amended in 2004, the Ontario Ministry of Transportation Branding Program was still in its infancy, and the effectiveness of this program was unknown. CarProof and CarFax type reporting systems were not even considered as alternate means for providing on-line reliable comprehensive vehicle history reports.

The staff report recommends that a By-Law amendment for limousines "Ontario pedigree" requirement that is currently applicable to taxicabs should not be implemented and the rationale for their recommendation is contained within the report. The TTA agrees with this recommendation.

The TTA believes the "Ontario born and bred" vehicle history for taxicabs by-law provision is no longer required because of reasons the staff report cites namely, an effective Ontario Ministry of Transportation Branding Program and the availability of independent providers of vehicle history reporting. The TTA estimates there is an average cost to be at least \$1500.00 for every used replacement taxicab and thus is costing our industry hundreds of thousands annually. This cost is directly attributable to the lack of vehicle availability meeting the Ontario continuous vehicle history criteria.

The TTA recommends that Municipal Code 545, Section 140, Subsection K be reviewed and amended to remove the "Ontario pedigree" requirement for replacement vehicles to be used as taxicabs. The TTA recommends a vehicle history be submitted prior to a replacement vehicle being registered to ensure the vehicle has not been previously branded in North America.

Respectfully,

Jim Bell
President, Toronto Taxicab Alliance (TTA)