

LS 18.4.3

Terry Danylevich

January 08, 2009

Licensing and Standards Committee
Secretariat
City Clerk's Office
City Hall, 10th Floor, West Tower
100 Queen Street West
Toronto, Ontario M5H 2N2

CITY CLERK'S OFFICE
SECRETARY SECTION
2009 JAN -8 P 3:57

To: Chair Howard Moscoe and Committee Members

**Re: Item LS18.4 - Vehicle Branding and Continuous Registration of Vehicles in
Ontario for Licensed Limousines**

My name is Terry Danylevich. I am an independent limousine owner operator licensed by the City of Toronto, and I have been continuously licensed by the City in various roles for over 35 years beginning in the summer of 1973. I have previously operated as a taxi driver, taxi lessee, taxi owner, livery cab driver, livery cab owner. In addition to my current licensed status as a limousine operator, I am also a licensed taxi driver. I am writing to you on behalf of the Toronto Livery Association.

The Toronto Livery Association (TLA) is an association of over 30 City of Toronto licensed limousine stakeholders (or Limousine Service Companies) that in turn operate over 70 Toronto licensed limousines.

Most of our supporters are single owner limousine operators, with a smaller number of 2 and 3 car operations, as well as a small number of midsize multi-vehicle operators. A majority of these limousines were previously licensed and operating as *Livery Cabs* for many years prior to September 01, 2005; this date being the effective date that the new limousine By-law 706-2005 took hold.

OPINION OF STAFF REPORT

After a thorough reading of the Municipal Licensing and Standards staff report, we agree with its findings and recommendation.

RECOMMENDATIONS

We ask that the Licensing and Standards Committee accept the recommendation of the Executive Director.

Specifically:

That the Toronto Municipal Code not be amended to require Toronto licensed limousines to be continuously registered in Ontario.

In Addition

We also ask the Licensing and Standards Committee to consider removing the continuous Ontario registration requirement for Toronto taxis from the Toronto Municipal Code.

COMMENTS

Under the report heading of “Issue Background”, it said that this issue was brought about because of concerns about used vehicles being used for limousines in Ontario. The City staff report makes clear that these concerns are without foundation.

The Ontario branding program combined with the stringent safety inspections carried out twice yearly by City mechanics has shown itself to be most effective in providing safe vehicles to be used as limousines, and at the same time has not dramatically increased our capital costs.

The possible addition of vehicle history reports such as **CarProof and CARFAX** in addition to the Ontario used vehicle packages would provide a higher degree of safety assurance when using out-of-province vehicles as Toronto limousines.

It should be noted that non-Ontario vehicles have been used for many years prior to the new limousine by-law came into effect as well as before the Ontario branding program was instituted. The previous by-law only required a single yearly inspection by City mechanics.

The removal of our ability to have access to non-Ontario vehicles would create unnecessary financial hardship for no measurable increase in public safety. The financial strain on 696 Toronto limousines operated by 111 Limousine Service Companies would be staggering, as it would be saddled with a estimated 7 million dollars in additional costs (assuming \$10,000.00 per vehicle).

This price differential could change with the changing currency values. However, the rules of supply and demand would still play an important role in initial vehicle costs.

In addition to the financial harm, the dramatic down-ward spiral that the Canadian economy is now experiencing, along with the rest of the world, will compound that effect. Tourism and business trips to Toronto will no doubt drop and this will of course impact our business as it is estimated that approximately 60 to 70 percent of our business is airport orientated.

In closing, we once again ask that:

The Toronto Municipal Code not be amended to require Toronto licensed limousines to be continuously registered in Ontario, and;

That the Toronto taxi industry also be considered for such benefit.

Yours truly,

Terry Danylovich,
Toronto Livery Association