

**From:** [Kristine](#)  
**To:** [General Government and Licensing](#)  
**Subject:** Written Submission Re: Item GL26.11 - Back to School Vehicle for Hire Training  
**Date:** October 19, 2021 4:16:58 PM  
**Attachments:** [image001.png](#)  
[LTR - EKGPC to City re By-law 1517 - 20195.pdf](#)  
[MLS Response to EKGPC -09-08-2021.pdf](#)

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Good afternoon,

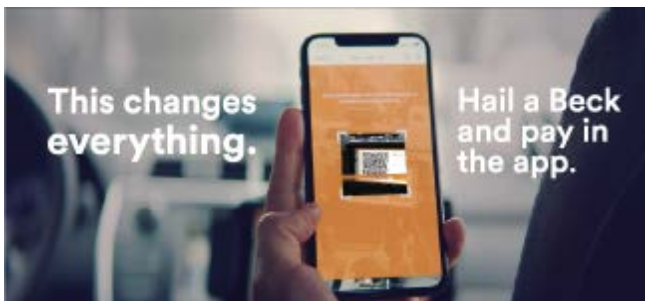
Please accept the two attached documents for submission/distribution to the committee in advance of tomorrow's meeting. I wanted to bring this letter and MLS response to their attention in case it was missed.

Thank you,

Kristine

**Kristine Hubbard**

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**Via Email**

August 27, 2021

Mr. Carleton Grant  
Executive Director, Municipal Licensing and Standards  
Toronto City Hall  
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Telephone: 416-392-8445  
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Dear Mr. Grant,

**Re: City of Toronto's By-law 1517-20195 – New Driver Training**

We are the solicitors for Beck Taxi, City Taxi, Co-op Cabs, Fleet Operators Association and Toronto 1 Taxi (Scarborough City Cab). We write today regarding By-law 1517-20195 (the "By-law").

As you are aware, under the By-law, the City of Toronto is responsible for ensuring that training for taxicab, limousine and personal transportation drivers takes place before the City issues licenses. Our understanding is that:

- Drivers of taxicabs and limousines needed to successfully complete a third-party training program approved by the City as a requirement of licence issuance or renewal.
- The new training requirement aims to improve driver awareness and enhance public safety.
- Preliminary topics include transporting passengers in a safe manner; driving in an urban setting; providing accessible service; anti-racism, diversity and sensitivity; and legal requirements.

The requirement for training was approved by City Council at the Council Meeting on July 16, 17 and 18, 2019. Since then, it appears multiple deadlines have passed. A training program was to be in place by June 2020. It was then to be in place by Q4 of 2020. It is our understanding that as of today, there is still no training program. However, the City has licensed more than 40,000 drivers without requiring the training mandated under the By-law.

In our respectful view, the lack of mandatory driver training creates a significant risk to the public. It also creates a significant risk to the City of Toronto of claims when accidents involving untrained drivers who were required to be trained under the By-law occur.

We write today to request an update regarding why the City has continued to issue licences to untrained drivers, when it is anticipated that the By-law will begin to be applied as approved by Council, and what the City's plans are regarding drivers granted licences without complying with the By-law requirements.

If a response to this correspondence could be provided within 14 days it would be sincerely appreciated. Thanking you in advance for your assistance.

Yours truly,

**ERIC K. GILLESPIE  
PROFESSIONAL CORPORATION**



Eric Gillespie  
EKG/sq

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**Municipal Licensing and Standards**  
Tracey Cook, Deputy City Manager

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**Sent Via Email**

September 8, 2021

**Re: City of Toronto's By-law 1517-20195 – New Driver Training**

Dear Mr. Gillespie,

Thank you for your letter regarding the implementation of a new driver training program for the vehicle-for-hire industry.

To ensure the safety of consumers, drivers and the public, the Municipal Licensing and Standards (MLS) Division continues to ensure that drivers hold a Class G or higher provincial driver's licence, pass driver screening and vehicle requirements, and carry \$2,000,000 in mandatory insurance coverage. Despite these measures, a mandatory training requirement was re-introduced, with amendments, in 2019, to enhance vehicle-for-hire and PTC driver knowledge. It is worthwhile to note that MLS licenses and permits 99 different businesses, but has only provided City-run training programs for the taxicab and limousine industries.

With the removal of training in 2016, it was anticipated that the vehicle-for-hire industry would enhance or implement new training as part of their business practices. However, during the 2018 and 2019 Vehicle-for-Hire Bylaw Review, driver knowledge was identified as a concern in public opinion research and during the consultation process; therefore, Council re-introduced a mandatory training requirement.

Over the past year and a half, as resources and capacity have allowed, staff have continued to advance the implementation of amendments to [Toronto Municipal Code, Chapter 546, Licensing of Vehicles-for-Hire](#), including a training program. For example, at the beginning of 2020, staff issued a procurement call for third-party training providers and began the review and assessment process. However, with the onset of the COVID-19 pandemic in March 2020, MLS resources were redirected to urgent COVID-19 enforcement efforts, the digitization of licensing administration, and to support housing initiatives such as short-term rental licensing, multi-tenant housing and RentSafeTO. This was outlined in a report from Toronto's City Manager to the Executive Committee in April 2021 (see [2021.EX23.1](#)). In addition to these urgent priorities, MLS introduced operational programming to support businesses through the COVID-19 pandemic, including a grace period for all licence renewals and waiving late fees.

As directed by Council, MLS specifically undertook a review of relief measures for the taxicab industry. As with many licensed businesses, the vehicle-for-hire industry was affected by the COVID-19 pandemic. While the taxicab industry does not currently provide trip data to the City, the TTC Wheel-Trans indicated that their taxicab contract has been operating at 35-40 percent of normal capacity. Similarly, private transportation company (PTC) trips continue to operate at 35-40 percent of normal capacity. The number of drivers in the industry has also fallen, by almost 50% for PTCs (from approximately 90,000 to 46,000) and 38% for the taxicab and limousine industries (from approximately 13,000 to 8,000). As such, Council introduced several relief measures to support the taxicab industry, including extending the maximum age of vehicles for two additional years, temporarily reducing the regulatory charges for the Vehicle-for-Hire Accessibility Fund Program by 75 percent, and reducing licensing fees by 50 percent (see [2020.GL19.4](#) and [2021.EX21.2](#)).

The City will be providing an update on Vehicle-for-Hire regulations to the General Government and Licensing Committee in November. More information will be available soon. The report will provide an update on the introduction of a mandatory training program for non-accessible vehicle-for-hire and PTC drivers, as well as the implementation of other 2019 bylaw amendments, such as the collection of taxicab trip records and collision reporting.

Thank you,

A handwritten signature in blue ink, appearing to read "Carleton Grant".

Carleton Grant  
Executive Director  
Municipal Licensing and Standards

CC: Fiona Chapman, Director Business Licensing, Municipal Licensing and Standards