September 20, 2012

Licensing and Standards Committee
City Hall, 100 Queen Street West
Toronto, Ontario M5H 2N2

Re. Recommendations for Toronto Taxi Review

Dear Chair Palacio and Committee Members;

Scarborough City Cab (SCC) has been serving the transportation needs of a diverse set of clients in the City of Toronto for more than 24 years. For the last 17 years, SCC has continuously provided accessible transportation services on behalf of TTC Wheel-Trans. During this time SCC has adhered to the provisions of the TTC service agreement while maintaining an excellent track-record of providing safe and on-time services to hundreds of thousands of Wheel-Trans customers.

Over the past year, SCC has been actively involved in the Taxi Industry Review process, attending several public meetings and participating in industry working group meetings. Throughout this process, we have had the opportunity to listen to various industry stakeholders. We have spoken with SCC operators to get their perspective. We have also reviewed the preliminary findings of the Taxicab Review Team. As a result, we have developed some important recommendations that we encourage the Taxicab Review Team to include as part of its final report.

1. Scarborough City Cab recommends that W-licensed and Ambassador plates should be converted to Standard plates. SCC recommends that 100 Ambassador plates per year be converted to Standard plates based on "seniority", that is, in the order that the plates were issued. This phased approach allows the industry to accommodate the supply and demand of converted plates while allowing drivers who have been in the taxicab industry most of their lives and have waited almost two decades for a standard plate to attain an asset with meaningful value for their retirement. It should be noted that this is not a new expectation but rather the same policy as was in place when these individuals joined the industry and the reason they have continued to provide service to the public and be part of the industry. This conversion process will address the fundamental problem of inequality affecting the taxicab industry.
2. SCC is recommending that W-plate and Ambassador plate owners who have provided at least five (5) years of service for Wheel-Trans be the first group to have their plates converted to Standard. In 1998, some taxicab operators on the list for a standard plate chose to assume a W-taxi plate because of their desire to provide accessible services on behalf of Wheel-Trans. There are also several Ambassador plate owners who have committed themselves and their livelihood to providing accessible transportation instead of conventional cab services. These individuals absorbed an additional $20,000 - $25,000 vehicle conversion cost (on top of the purchase price of the vehicle) to provide service for Wheel-Trans. The commitment that W-plate and Ambassador plate owners have made to the accessible community and the City should be recognized. We feel that even once converted to standard, this group of individuals will likely

continue to provide service for Wheel-Trans as they enjoy the work they do. Many have been serving Wheel-Trans clients continuously for 5, 10, even 15+ years.

3. In order to ensure sufficient accessible vehicles for Wheel-Trans service as well as to provide options for on-demand accessible service, the City should impose a condition that allows up to 50 additional ambassador plate owners outside of the 100 plates per year conversion group to "Jump the Queue" (based on seniority) and have the option to convert their vehicles to accessible vehicles that comply with Wheel-Trans requirements and be required to provide accessible service for at least five (5) years either for the Wheel-Trans contract or regular, on-demand accessible service as well as regular taxicab services. The conversions should comply with Wheel-Trans specifications in order to sustain existing and future Wheel-Trans needs. Converting vehicles to accessible cabs will increase the number of accessible vehicles on the roads, thereby allowing the City to meet its AODA obligations.

4. The Taxi Review includes the introduction of accessible cabs for general, on-demand metered service. In order to control the availability of accessible vehicles, brokerages (that manage a fleet of 50 taxicabs or more) should be mandated to retain a certain percentage of accessible fleet for on-demand service. This can be achieved by providing brokerages with at least two (2) W-plates or accessible permits. These plates shall have no monetary value. This achieves the intent of the AODA and ensures that companies that are mandated to provide accessible fleets have the resources to manage accessibility compliance by investing in accessible vehicles and selecting suitable operators to provide the service.

5. The City should consider increasing the plate registration fee (by a reasonable percentage) from the current standard plate registration fee for all Ambassadors converting plates to standard.

6. Finally, the new taxi provisions established by the City of Toronto should include a five (5) year review to allow for reassessment of industry and customer needs based on objective market analysis as well as input and feedback from all industry stakeholders. This regular review will allow the by-law to be amended accordingly every five (5) years.

We applaud the efforts of the City of Toronto to initiate and pursue this much needed taxicab review process and we look forward to continuing to provide quality accessible transportation services for City of Toronto residents.

Yours truly,

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General Manager
Scarborough City Cab

cc. Councilor Palacio, Chair – Licensing and Standards Committee

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