

APPENDIX A: PUBLIC ENGAGEMENT

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ENGAGING THE TAXICAB INDUSTRY

As directed by City Council, Municipal Licensing and Standards has undertaken a review of Toronto’s taxicab industry which has involved extensive public engagement with the taxicab industry and public. In addition to holding 40 consultations and 100 smaller meetings, staff also engaged stakeholders and the public through email, surveys, training classes, voicemail and the review of submissions received through mail and in hard copy. A priority of the taxicab review has been to ensure every stakeholder group’s opinions are heard, including:

- Accessible Licence holders
- agents and/or fleet operators;
- Ambassador Licence holders
- Brokerages;
- drivers;
- Standard Licence owners;
- special interests groups and industry associations;
- the riding public and organizations representing rider interests;
- tourism, hospitality and business communities; and,
- various City divisions and other public agencies, including the Toronto Transit Commission (TTC) and Toronto Police Service (TPS).

Throughout the review, from November 2011 to January 2014, staff have received a large volume of input from stakeholders and the public, summarized in Figure 1 below. All input has been carefully reviewed in order to understand stakeholders’ diverse ideas, suggestions and opinions. Each type of input is explained in subsequent sections, followed by a detailed summary of the ideas submitted. To view full submissions and emails received by the Taxicab Industry Review team, please visit www.toronto.ca/taxireview and select the “What We’ve Heard” page.

FIGURE 1: SUMMARY OF INPUT

Type of Input	Volume
Consultations and large meetings	40
Smaller meetings	100
Emails to taxireview@toronto.ca	900

Online comments left at www.toronto.ca/taxireview	611
Paper comment forms received at consultations	1430
Large Petitions	3 large petitions (with 2300, 400 and 112 received of each)
Proposals and long submissions	17
Taxicab Training Centre Refresher program discussions	21 classes engaging over 700 drivers
Surveys administered by staff and Taxi Research Partners	6020
Telephone calls to the Taxireview Voicemail, 416-338-3095	120

CONSULTATIONS AND MEETINGS

Consultations and meetings have been essential for staff to gain stakeholder insight and input into industry issues and options to address them. Between December 2011 and January 2014, a total of 40 consultations and large meetings were held, in addition to 100 small meetings between stakeholders and senior management. In total, more than **3,000 different individuals attended these meetings**, many attending several consultations, resulting in **over 4,800 participants in attendance**.

A broad range of consultations and meetings were held, focusing on different topics, involving different stakeholder groups, and held at different times of day and locations. There were three broad ways in which stakeholders were consulted:

- **Identification of issues, options and review planning:** All stakeholders were invited to identify issues and options to address these issues, as well as to share what was important to them for the review. Input helped plan the next round of consultations where identified issues and options would be discussed in detail.
- **In-depth exploration of identified issues and solutions:** The issues and options identified were grouped into categories, forming the topics for discussion at the consultations. For licensee categories with low attendance or little input into particular areas, additional meetings and outreach was arranged to involve them.
- **Discussion of options and recommendations:** Staff prepared a Framework for Change which identified 44 draft recommended changes for improving the taxicab industry. The Framework facilitated discussion

with stakeholders and allowed for input and direction from stakeholders on the formation of the final recommendations.

At these meetings, attendees were invited to discuss their ideas, ask questions, submit their ideas through various comment forms and surveys. For those who did not feel comfortable openly sharing their views, participants were encouraged to share their ideas through voicemail, email or through the online comments form. In addition to receiving over 1,430 comment forms from these meetings, staff also took extensive notes on ideas, comments and suggestions. The consultations are listed below by date and topic.

FIGURE 2: LIST OF CONSULTATIONS AND LARGE MEETINGS

No.	Date	Topic
1	December 8, 2011	Identification of Issues and Review Planning
2	March 9, 2012	Planning Phase Meeting
3	March 20, 2012	Licensing Structure - Drivers Only
4	March 22, 2012	Licensing Structure
5	March 27, 2012	Brokerages, Agents and Leasing
6	March 29, 2013	Taxicab Riders Consultation 1
7	March 29, 2013	Taxicab Riders Consultation 2
8	April 3, 2012	Accessibility – Accessible Riders and Interest Groups
9	April 3, 2012	Accessibility – Accessible Transportation Providers
10	April 10, 2012	Licensing Structure – Drivers Only
11	April 12, 2012	Licensing Structure, Brokerages, Agents and Leasing
12	April 16, 2012	Accessibility - Accessible Riders, Interest Groups and the Accessible Industry
13	April 16, 2012	Customer Service and Technology
14	April 29, 2012	Standard Owners Only
15	May 1, 2012	By-law issues
16	May 2, 2012	Issues Which May Be Outside the Jurisdiction Of The City Of Toronto
17	May 3, 2012	Taxicab Industry Relationship with the City of Toronto

18	May 29, 2012	Toronto Transit Commission, Toronto Police Service and Various City divisions
19	June 4, 2012	Businesses Improvement Areas, Insurance and Tourism and Hospitality
21	August 14, 2012	Taxicab Industry Relationships with Toronto Police Service and the City
22	August 28, 2012	Preliminary Report Information Session
23	August 29, 2012	Preliminary Report Information Session
24	August 30, 2012	Preliminary Report Information Session – Accessibility focus
25	November 8, 2012	Taxicab Advisory Committee, Bill of Rights and Compliments and Complaints
26	March 28, 2013	Insurance Industry
27	June 21, 2013	Framework Report Information Session
28	June 24, 2013	Framework Report Information Session
29	July 9, 2013	Framework Report – Accessibility recommendations
30	July 10, 2013	Framework Report – Licence and Implementation
31	July 15, 2013	Framework Report – Technology and Data Collection
32	July 18, 2013	Framework Report – Fleets, Agents and Brokerages
33	August 15, 2013	Framework Report and Insurance Industry
34	August 21, 2013	Framework Report and Fleet Operators
35	August 22, 2013	Framework Report and Brokerages
36	September 9, 2013	Framework Report - All Recommendations
37	September 12, 2013	Framework Report Information Session – Driver Safety
38	September 16, 2013	Framework Report Information Session – Accessibility
39	October 17, 2013	Framework Report Information Session – Drivers Only
40	November 20, 2013	Framework Report Information Session – Drivers Only

SURVEYS

In addition to extensive stakeholder engagement through public consultations and meetings, the Taxicab Review Team conducted/commissioned seven surveys, receiving 6,020 completed entries. Surveys were conducted on a variety of topics, which are summarized in Figure 4:

FIGURE 3: LIST OF SURVEYS COMPLETED IN THE TAXICAB REVIEW

Surveys	Number of surveys completed
Passenger customer service survey about taxicab service	60
Passenger customer service exit interview administered immediately after passenger exited a taxicab	43
Business community survey about taxicab industry	6
Mystery rider survey	100
In-depth passenger survey about service, wait times and other factors, administered by consultant Taxicab Research Partners	1,200
Industry survey about taxicab driver safety	3,616
Framework for Change Report Survey	995
Total surveys completed	6,020

EMAILS, ONLINE COMMENTS, VOICEMAIL AND MAIL

Throughout the Review, stakeholders have been encouraged to share their input through the Taxicab Review website, online comments form, voicemail and mail to the Team. They have also been encouraged to sign-up online and to be included on the mailing list to receive regular updates. As per Figure 1, many industry stakeholders got involved through these media, sending over 900 emails, leaving over 611 online comments and 120 voicemails. In addition, over 700 persons signed up for the mailing list.

REACHING OUT TO THE INDUSTRY: TRAINING, MEDIA AND MAIL-OUTS

To maximize stakeholder participation, the Review Team also reached out to the industry using other means:

- **Taxicab Training Centre Refresher programs:** The Taxicab Training Centre runs a Refresher Training program which licensed taxicab drivers must attend. In order to ensure driver input into industry issues and potential solutions, drivers from more than 21 classes were engaged to share their ideas.
- **News media:** Throughout the Review, information about consultations and engagement opportunities were shared through the City of Toronto twitter feed and press releases which was reflected in news media outlets, including an industry newspaper, TaxiNews.
- **Mail-outs:** In order to ensure all stakeholders were informed of the ongoing Review, letters with surveys were sent to all taxicab licensees, providing them information about the review and seeking their input on driver safety.

FRAMEWORK FOR CHANGE – JUNE – DECEMBER 2013

This section contains an overview of the feedback received in response to the Framework for Change report which contained 44 draft recommendations for the taxicab industry. Some recommendations received a great deal of feedback, such as the Toronto Taxicab Licence (TTL) while no new input was received on other areas, such as safety. The input received is summarized below in two sections, by general stakeholder opinions here, as well as by topic.

GENERAL FEEDBACK BY STAKEHOLDER GROUP

ACCESSIBILITY STAKEHOLDERS

Among accessible taxicab riders and advocacy groups there was strong support for the provision of 100% accessible taxicab service. The Spinal Cord Association of Ontario, along with 6 provincial disability organizations endorsed achieving 100% of taxicabs to provide wheelchair accessible taxicab service, as well as for technology that improves accessibility for people who have hearing or vision impairments. There was some concern that the implementation of wheelchair accessible service will be over too long a time frame.

The City of Toronto has a Disability Issues Committee (DIC) that provides advice to council on disability issues. The DIC provided unanimous support for the provision of 100% wheelchair accessible taxicab service.

AGENTS AND FLEETS

There is concern that the owner-operator principles of the TTL will negatively affect the way fleets currently operate and the suggestion that this will reduce the availability of taxicabs in off peak times. Fleets requested to be licensed industry participants. They also requested that they be able to own more than one taxicab licence.

AMBASSADOR TAXICAB OWNERS

Many Ambassador Taxicab owners support the new TTL, however some requested that their licence be converted to a Standard Taxicab Licence. Comments were received that a second driver will not be financially feasible if the Ambassador Taxicab is only allowed on the road for 12 hours/day.

DRIVERS AND LESSEES

There is strong support for the new TTL licence and that TTL owners must be drivers. There is also strong support to eliminate fleets and agents.

STANDARD TAXICAB OWNERS

Many Standard Taxicab owners strongly disagree with the new licence and are concerned about a loss of value in the resale of their Standard Taxicab due to the owner-operator principles and the requirement to have an accessible vehicle. Standard owners also would like to be able to bequeath their licences to family members who would not have to drive the taxicabs.

TAXICAB BROKERAGES

Many brokerages were opposed to the TTL, the provision for the 100 % accessible taxi fleet and increased requirements of the proposed technology. Many brokerages felt that accessible taxicab service could be satisfied through new issuance of licences. Brokerages also described that many passengers do not want to ride in van-taxicabs.

FRAMEWORK FEEDBACK BY TOPIC

This section provides more detailed information about the feedback received about Framework suggestions.

TORONTO TAXICAB LICENCE

Different industry stakeholders had differing views on the proposed licence type, the Toronto Taxicab Licence (TTL), and the recommended conditions of their licences.

Ambassador and Accessible owners generally supported the TTL and believed that they should receive a transferable licence due to their investment in the taxicab industry. Some Ambassadors are opposed to the idea that their vehicle be required to be accessible and argued for the ability to lease their taxicabs similar to the Standard Taxicab.

The opposition to the accessibility aspect of the TTL arises from the higher capital costs and potential difficulty insuring the vehicle. They also advised that there may be lower demand for accessible taxicab service because of public preference for sedans.

Accessible owners and those with accessible vehicles supported that every vehicle should be accessible, advising that it made sense for Toronto and that once all vehicles were accessible, the public would not be able to exercise preferential treatment for sedans.

Many Ambassadors advised that the ability to hire one additional driver would not be feasible due to the increase in insurance costs for an additional driver on a shared shift. Comments were received that the City should not restrict the number of drivers that could be hired and that the taxicab should be able to operate 24 hours per day.

As evidenced by submissions from the Disability Issues Committee (DIC) and personal submissions, persons who use accessible taxicabs greatly support that all taxicabs would be accessible and believe that the accessible vehicle requirement is an essential component of the TTL.

Standard owner licensees were strongly opposed to the TTL, expressing concern that the Standard Licence would be devalued and the transition to the TTL would cause financial hardship. Many Standard owners explained the sacrifices they made to purchase licences and didn't believe that Ambassador and Accessible owners should receive their licences "for free". Some believed that taxicab owners should not be required to drive and that there are no significant issues with the industry as it is.

Fleet owners who operate garages and act as agents believed that their businesses would be impacted by the TTL, which they said could greatly decrease the number of shift drivers operating at night time. They advised that the TTL owners will not likely use garages, and if they do, this would still be problematic, as it would create conflict around who would insure and maintain the vehicle.

Thousands of drivers strongly supported the TTL, believing it would make drivers more likely to own a taxicab in the future, than the current system and that the elimination of middlemen would reduce the frequent increases in fares. They expressed that all current licences should be converted to the TTL, with a quick transition time.

Brokerages generally supported conversion of all Ambassador and Accessible Licences to Standard Licences rather than TTLs and believed that the TTL would hinder their investments as Standard owners and their operations as brokerages.

TECHNOLOGY

Stakeholders had a number of concerns and suggestions about the proposed mandatory Vehicle Information Technology (VIT) (a device which the City would use to collect information to determine taxicab usage and demand) and Passenger Information Monitor (PIM), a device which can provide audible and visual information to persons with disabilities, enable GPS dispatching, as well as other things. Concerns are summarized here:

Collection by current means: Some suggested that a VIT was not necessary and that the taxicab ride information could just be collected from brokerages, public surveys and/or estimated by a consultant every few years, as it had been done now.

Determining driver income, information confidentiality and use: Some stakeholders expressed that this technology would allow the City to determine driver's income by estimating fares through trip data or that the data would be used inappropriately.

Enforcement: One stakeholder believes that the VIT would be used as an enforcement tool, allowing the City to track if a driver had operated for more than 12 hours or to monitor for other infractions.

Cost: Most stakeholders expressed concern over the capital and operating cost of the VIT which may lead to higher lease and rental costs for drivers.

Passenger safety and insurance: A few persons expressed concern over passenger safety, advising that in the event of a sharp brake, a passenger might jerk forward and injure themselves on the hard PIM terminal. This increased risk could increase insurance premiums as well as greater incidence of passenger injury.

Smart phones as an alternative: Another stakeholder proposal was that Smart phones could be used by the City to determine demand, rather than requiring VIT to be installed. The suggestion was that most drivers have Smart phones now, so the City could develop a mechanism to allow tracking, preventing a large investment into VIT consoles.

Meter regulation: A meter shop owner thought that the VIT was a good idea and would help to reduce or eliminate the technological tampering for those who were charging fares different from the By-law.

INSURANCE

Prior to the Framework Report, the insurance industry explained that the high costs of taxicab insurance in Toronto are a direct result of the risks in the industry. These risks include the length of time vehicles spend on the road, inexperienced drivers with poor driving records, passenger hazards, and a resulting increase in the frequency and severity of potential claims. Insurance stakeholders reported that the City could have an indirect effect on the high costs of insurance by implementing measures to more effectively manage risk in the taxicab industry. These suggestions included more frequent driver abstract, criminal background and medical checks, in-car or simulated driver training and more frequent refresher training.

Insurance industry representatives also reported that the City's insurance certification system, which requires naming the taxi plate owner, and taxi plate lessee where applicable, impedes the ability of designated agents, acting as fleet operators and taxicab brokerages, to access properly crafted fleet insurance solutions. Without the fleet operator listed on the insurance certificate filed with Municipal Licensing and Standards, underwriters have difficulty identifying designated agents as fleet operators; as a result, underwriters may restrict access to fleet rating. Without fleet rating, each taxicab is subject to filed rates that are considerably more expensive than fleet insurance pricing.

Representatives discussed consulting with the province to institute a system of 'dual-plating', whereby both the names of the taxicab owner (and lessee where applicable) and the fleet operator would be listed on the vehicle registration, the automobile policy and the insurance certificate issued to the City of Toronto. This would enable insurers to identify all those with an insurable interest in the operation of the taxicab, and assist them in gaining access to appropriate and possibly more affordable fleet insurance coverage.

Insurance industry representatives expressed support for the proposed recommendation to institute simulated driver training. However, representatives expressed concerns that the TTL will impede the taxicab industry's ability to operator as fleets, and thereby require each taxicab owner to access insurance through individually filed rates, which are typically higher than the pricing afforded to fleets. Representatives expressed concern that without fleet operators managing risk in the industry, and being able to demonstrate risk management to insurers, the proposed changes could negatively impact the already high costs of insuring taxicabs in Toronto. The industry did, however, note that owner-operator taxicabs are typically the most affordable to insure, and that it is possible licensees under the new TTL will form associations to commonly manage taxicabs in order to access cheaper fleet rating insurance.

In the transition to the TTL, Ambassador drivers would be permitted to hire a second driver but would still have the limitation that their vehicle could be operated as a taxicab for up to 12 hours per day. Many Ambassadors expressed that a second driver would not be financially beneficial to them, as the increase in insurance premiums

would be counteract any profit they could make from a driver given the limited number of hours the driver could operate.

Finally, insurance industry representatives expressed concerns that drivers issued a TTL will face higher insurance premiums as a result of the higher capital costs of the required accessible vehicle, and the increased bodily injury claims that could result with more disabled passengers using taxicabs in the City.

ACCESSIBILITY

Persons who require accessible taxicabs have emphasized the need for more taxicabs which provide accessible service, creating taxicab service that is inclusive for all Torontonians. The Disabilities Issues Committee (DIC), organizations representing persons with disabilities and individuals who use accessible service have expressed great support for Toronto moving towards 100% accessibility, especially in time for the Pan American games coming in 2015.

All licensee groups agree that the number of accessible vehicles should increase, but there were varying opinions on the appropriate number. Various stakeholders who operate accessible vehicles, such as Accessible owners and Ambassadors, expressed support for 100% accessibility and that it is a necessary step for a major City. Another suggestion is that the first 500 TTLs should be required to be accessible or that licensees should receive incentives to voluntarily convert while the City monitors accessible demand.

Many other stakeholders opposed the idea of 100% accessibility, stating that it was not necessary to serve Toronto's population and that the cost would make it difficult to afford. They explained that the purchase cost, maintenance and insurance for accessible vehicles was prohibitively high and that insurance companies were hesitant to continue to insure an accessible vehicle. Some suggested Toronto look at other cities to help determine an appropriate percentage. They also expressed that the public generally prefers and choose sedans instead of accessible vehicles.

Many stakeholders said they felt forced to provide accessible service without adequate compensation. Some drivers expressed that they are not able to physically operate accessible vehicles due to their own disabilities and that this requirement would force them out of the industry. Other stakeholders pointed out that some people have difficulty entering what is considered an "accessible vehicle", and that other forms of vehicles are necessary to accommodate these passengers.

There was a significant amount of discussion on the idea that the City should be providing incentives or subsidies to make accessible service feasible. Some brokerages expressed that they would ensure accessible metered on demand service if the City issued licences directly to them.

SAFETY

Many of the safety recommendations made were in line with stakeholder suggestions and received a lot of support, such as the ability for drivers to ask for payment in advance, increased investigation for fare jumping, partnering with Crimestoppers and a new Bill of Rights for the taxicabs.

SOILING FEE

There was wide support for a soiling fee that drivers can charge if someone vomits or otherwise soils their vehicle, however many responses were received that it should be at least \$50 instead of the \$25 suggested.

CABSTANDS AND HAIL SPOTS

There was unanimous support for the use of hydrants as cabstands, Hail Spots and initiatives that would increase the number of places to easily pick up passengers.

IMPLEMENTATION OF CHANGES

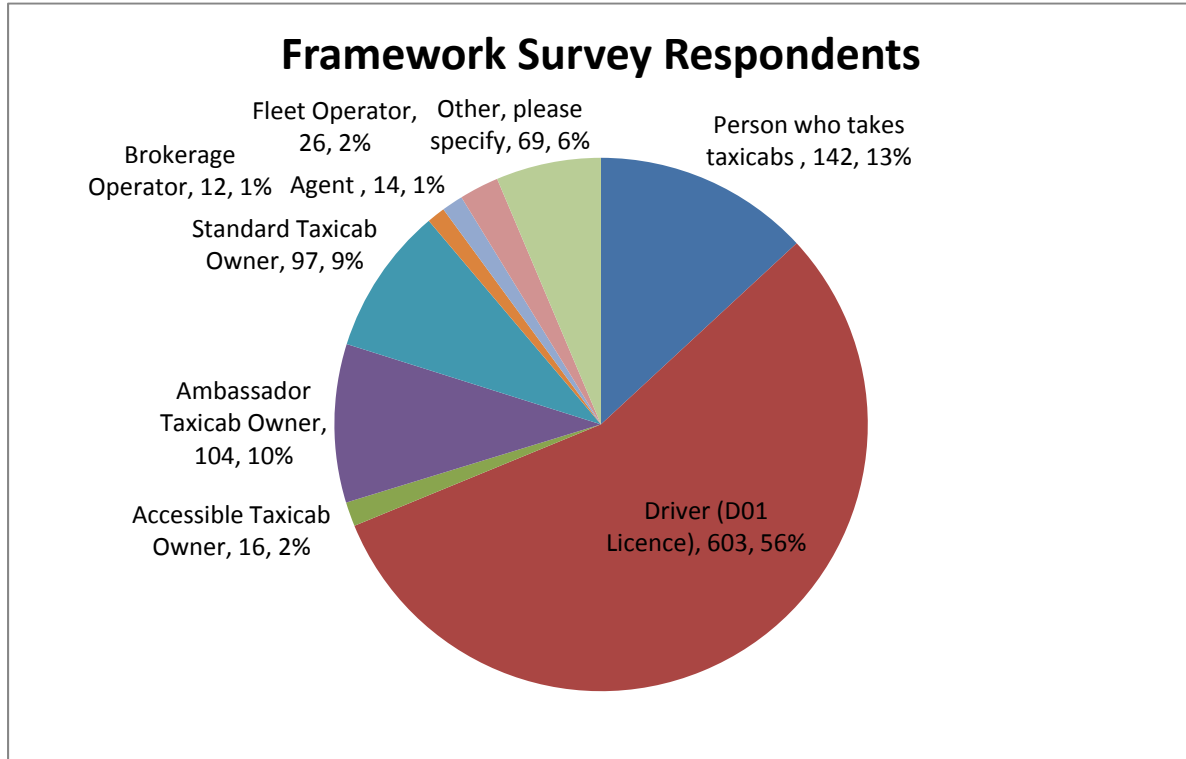
Many suggestions were received advising any major changes should be implemented over time with a lot of advance notice to stakeholders. Other suggestions were that stakeholders should be allowed to comply with new changes voluntarily and should be provided incentives to make changes, rather than be required to comply quickly.

Conversely, many drivers were eager for changes to take place which might lower their lease or rental fees, or enable them to obtain a taxicab owner's licence. Some suggestions were that the all licences should be converted to the TTL within 5 years.

THE FRAMEWORK FOR CHANGE SURVEY - RESULTS

Staff conducted an online survey to get feedback on several recommendations set out in the report. Input received is included in the sections above, however also summarized here by question. A total of 995 responses were received, with the majority of respondents identifying themselves as drivers as per Figure 5. The survey illustrated strong support for most of the Framework recommendations, especially for the Toronto Taxicab Licence (TTL). Responses are described below.

FIGURE 5: FRAMEWORK SURVEY RESPONDENTS



When asked about the characteristics of the TTL, the following responses were received:

- 74% of respondents believe that a person should be allowed to hold only one TTL and no other licences.
- 78% advised that a TTL owner must own, insure and maintain his or her licensed taxicab vehicle.
- 66% support that a TTL owner must drive his or her taxicab for a minimum of 167 hours within one calendar month.
- 45% disagree that TTL should be an accessible vehicle, while 42% support it and 13% have no opinion.
- 69% of respondents agree that after driving for a minimum of two consecutive years, a TTL owner may sell their taxicab and transfer their licence to a licensed taxicab driver.
- 63% support that a TTL owner may rent his or her taxicab on a shift basis to up to three licensed taxicab drivers, including having an agreement with a fleet operator.
- 74% support that if a TTL owner is ill, there can be a reduction of minimum driving hours for up to 24 months without losing the licence.
- 72% believe that all current licences should be transitioned to TTL.

With respect to Accessible Owners' Licences, the following responses were received:

- 60% support that Accessible owners should be able to convert immediately if desired.
- 60% support that TTL owners with accessible vehicles should be able to pick any passengers, even those who do not require accessible vehicles.

With respect to Ambassador Owners' Licences, the following responses were received:

- 70% of respondents believe Ambassadors should be required to drive a minimum of 167 hours per month.
- 59% support that Ambassador Licensees should be able to hire one additional driver on a shift basis if they equip their taxicab to automatically and electronically generate operator's logs unique to each driver.
- 64% support that Ambassador Licensees will be able to sell their taxicab and transfer their licence to a licensed driver who will be issued a TTL with all its properties.

With respect to the existing Standard Taxicab Owners Licence until at such time in which it is migrated to the Toronto Taxicab Licence (TTL):

- 71% support that Standard Taxicab Owner may only give custody and operational control to one person at any given time, who may not give custody and control to another person (i.e. either a lessee or an agent, but not both).
- 79% support that the person to whom custody and operational control has been delegated must be named on the vehicle registration permit and insured in the vehicle's insurance policy (i.e., either the lessee or the agent).
- 49% support that if the taxicab is not driven full-time by the person with delegated custody and control, the taxicab can only be operated by an agent who is affiliated with either a licensed public garage or brokerage, and the agreement to delegate custody and control will contain addresses of both parties; 38% of respondents disagree.

With respect to accessibility, the following responses were received:

- 43% of respondents agree that 100% of taxicabs should be accessible;48% disagree.
- 77% of respondents agree that 6% of taxicabs should be accessible in time for the 2015 PanAm Games.
- If not enough existing taxicab owners transition to the TTL, respondents believe that the the City should ensure there are enough accessible taxis by issuing TTL licences to drivers on the waiting list (64% support), issue temporary wheelchair accessible licences (22%) or issue licences to brokerages (9%).

The following other responses were received:

- With respect to issuing new licences, 63% support a ‘passenger service level’ approach to determining when new licences should be issued, i.e. that passenger wait time will be used to determine when new licences will be issued.
- 79% support that all taxicabs be able to accept credit and debit payment through Point of Sale (POS) terminals, both to enhance customer service and to decrease cash carried.
- 78% believe the fare should stay the same.
- 67% agree that drivers should be able to request payment in advance up to \$25.
- 66% support mandatory driver simulator defensive driver training.

DRIVER’S INPUT ON THE FRAMEWORK FOR CHANGE SURVEY

Through the drivers-only consultations engaging more than 2,200 taxicab drivers, there was large support for the changes suggested in the Framework, especially the idea to eliminate middleman or allow drivers more opportunity to own their own taxicabs. For those that suggested additional recommendations, many drivers commented that they would like the City to directly regulate and limit shift rental fees, POS fees and insurance.

From the Framework survey in which 550 drivers responded, we see that drivers strongly support many of the recommendations proposed in the Framework, as described below:

When asked about the characteristics of the TTL, the following responses were received:

- 92% of respondents believe that a person should be allowed to hold only one TTL taxicab licence and no other licences.
- 92% advised that a TTL owner must own, insure and maintain his or her licensed taxicab vehicle.
- 88% support that a TTL owner must drive his or her taxicab for a minimum of 167 hours within one calendar month.
- 50% agree that TTL should be an accessible vehicle.
- 81% of respondents agree that after driving for a minimum of two consecutive years, a TTL owner may sell their taxicab and transfer their licence to a licensed taxicab driver.
- 63% support that a TTL owner may rent his or her taxicab on a shift basis to up to three licensed taxicab drivers, including having an agreement with a fleet operator.
- 85% support that if a TTL owner is ill, there can be a reduction of minimum driving hours for up to 24 months without losing the licence.
- 85% believe that all current licences should be transitioned to TTL.

With respect to Accessible Owners' Licences, the following responses were received:

- 69% support that Accessible owners should be able to convert immediately if desired.
- 69% support that TTL licence owners with accessible vehicles should be able to pick any passengers, even those who do not require accessible vehicles.

With respect to Ambassador Owners' Licences, the following responses were received:

- 87% of respondents believe Ambassadors should be required to drive a minimum of 167 hours per month.
- 72% support that Ambassador licensees should be able to hire one additional driver on a shift basis if they equip their taxicab to automatically and electronically generate operator's logs unique to each driver.
- 67% support that Ambassador licensees will be able to sell their taxicab and transfer their licence to a licensed driver who will be issued a TTL with all its properties.

With respect to the existing Standard Taxicab Licence until at such time in which it is migrated to the Toronto Taxicab Licence:

- 84% support that Standard Taxicab Owner may only give custody and operational control to one person at any given time, who may not give custody and control to another person (i.e. either a lessee or an agent, but not both).
- 85% support that the person to whom custody and operational control has been delegated must be named on the vehicle registration permit and insured in the vehicle's insurance policy (i.e., either the lessee or the agent).
- 50% support that if the taxicab is not driven full-time by the person with delegated custody and control, the taxicab can only be operated by an agent who is affiliated with either a licensed public garage or brokerage, and the agreement to delegate custody and control will contain addresses of both parties.

With respect to accessibility, the following responses were received:

- 50% of respondents disagree that 100% of taxicabs should be accessible.
- 80% of respondents agree that 6% of taxicabs should be accessible in time for the 2015 PanAm Games.
- If not enough existing taxicab owners transition to the TTL, respondents believe that the the City should ensure there are enough accessible taxis by issuing TTL licences to drivers on the waiting list (76% support) or issue temporary wheelchair accessible licences (20%).

The following additional responses were received:

- With respect to issuing new licences, 72% support a 'passenger service level' approach to determining when new licences should be issued, i.e. that passenger wait time will be used to determine when new licences will be issued.

- 79% support that all taxicabs be able to accept credit and debit payment through Point of Sale (POS) terminals, both to enhance customer service and to decrease cash carried.
- 80% believe the fare should stay the same.
- 67% agree that drivers should be able to request payment in advance up to \$25.
- 64% support mandatory driver simulator defensive driver training.

IDENTIFIED ISSUES AND SUGGESTIONS DEC. 2011 – MAY 2013

This section provides a summary of input received throughout the earlier phases of the review, including issues within Toronto's taxicab industry and suggestions for how to improve the industry.

STAKEHOLDER IDENTIFIED ISSUE CATEGORIES

The general input from the first two phases of consultation with the industry issues has been organized into 11 different categories:

1. **Licensing Structures and Number of Taxicabs:** This includes taxicab ownership licence issues, such as types of licences, requirements to obtain and maintain a licence, numbers of ownership licences and systems to determine who receives licences.
2. **Brokerages and Dispatching:** This includes brokerages issues, such as driver fees, treatment and penalties, brokerage roles and responsibilities, regulation of brokerages, and other models of dispatching.
3. **Driver Health, Safety and Livelihood:** This includes issues relating to driver health, safety and livelihood, such as average income levels, lack of retirement plans and pensions, safety, treatment of drivers by customers, driver training, rest facilities and health.
4. **Agents, Leasing and Garages:** This includes agents and leasing issues, such as the roles and responsibilities of agents, regulation of agents, agent fees and lease rates, leasing regulations, other models of leasing and illegal/unethical leasing practices within the industry. This also includes issues related to garages, such as vehicle maintenance, driver treatment and fees.
5. **Enforcement, Training and Vehicle Inspection:** With respect to ML&S, this includes issues related to enforcement and inspection, licensee training programs and requirements, interactions with Municipal Standard Officers and the Vehicle Inspection Centre, volume of ticketing for Toronto taxicab drivers, driver penalty systems, ticketing and consequences for bandit taxicabs.
6. With respect to **Toronto Police Service**, issues identified included negative interactions between police officers and drivers, volume of ticketing for Toronto taxicab drivers, ticketing and consequences for bandit taxicabs.
7. **Tourism and Hospitality:** This includes various tourism and hospitality issues from both the perspective of the rider and the taxicab industry, such as customer service, the practice of hotel doormen accepting "cookies" (bribes) in order to assign customers to taxicabs, hotel discrimination against taxicabs and

preference for limousines, cross-industry relationships, and mutually beneficial solutions to increase business.

8. **Relationship with the City of Toronto:** This includes stakeholder interaction and involvement with the City of Toronto, such as the need for greater interaction with decision-makers and opportunities for stakeholders and the public to become involved in the decision-making process.
9. **Outside the Jurisdiction of the City Of Toronto:** This includes issues related to areas which may not be within the jurisdiction of the City of Toronto's By-law, such as regulations pertaining to airport pickup, fees for credit and debit cards, vouchers, taxicab rental and taxicab lease fees, insurance and traffic exemptions set out under provincial law. Although these issues may not be in the immediate jurisdiction of the City of Toronto By-law, the City still encouraged participants to share their concerns and potential solutions.
10. **Other By-Law Issues:** This includes other issues related to municipal law and policy, such as licensing fees, meter rates, flat rates, payment regulations, Business Licensing Thresholds, idling, cabstands, industry subsidies, licence transferability and vehicle age.
11. **Vehicles – Standardization, Safety & Technology:** This includes vehicle-related issues and options, such as the idea of a dedicated taxicab vehicle, a uniform Toronto taxicab colour scheme, and vehicles with greater fuel efficiency, accessibility and technology to benefit both the driver and the rider.
12. **Accessibility:** This includes issues relating to accessibility and cost of taxicab service, impact of the Accessibility for Ontarians with Disabilities Act (AODA), reaching on-demand accessible service, and the role of TTC Wheel-Trans.

This section provides a summary of input received by issue category. In addition to a summary of input received overall, some input is broken down by stakeholder groups in order to expand upon key perspectives.

CATEGORY 1: LICENSING STRUCTURES AND NUMBER OF TAXICABS

LICENSING STRUCTURES

The most common response collected in the entire consultation phase was that there should be only one type of taxicab licence and that 'middle men' like, designated agents, should be eliminated from the industry.

Many drivers expressed a desire to become Ambassador Licence holders. They believe that becoming an Ambassador driver will increase their income and provide them with more freedom. Drivers articulated that Standard Licences have become too expensive for them to purchase and that the Ambassador program represented their best hope for financial security within the taxicab industry.

A few Standard owners suggested that the City should eliminate the Ambassador program and offered several suggestions on how this could be implemented, such as immediate and gradual revocation.

A few suggestions were received that there should be a graduated licensing system, in which licensees would "graduate" from driver to Ambassador owner to Standard owner, depending on performance and years of service.

Some members of the industry suggested that there should be no changes to the ownership model, advising that the current system works well for everyone involved.

Some Standard Taxicab Licence holders advised that they should be able to possess an unlimited number of taxicab licences, arguing that the taxicab industry is the only industry in which one person is limited to one licence.

REQUIREMENTS TO OBTAIN/RETAIN A TAXICAB LICENCE

Many drivers expressed that Standard Licence holders should be more involved in the taxicab industry. Drivers advised that absentee licence holders are less likely to have well-maintained vehicles and that their use of agents drives up the prices of shift rentals and leases.

A few suggestions were received to allow more than one person to hold a Standard Licence, thereby making them more affordable and attainable to drivers.

There were polarized suggestions with respect to incorporation. Some taxicab licence holders wish to incorporate their licences for taxation and liability purposes, while others advised that corporations should not be able to have a taxicab licence.

TRANSFERABILITY AND THE TAXICAB LICENCE AS AN ASSET

Standard Taxicab Licence holders believe that upon their death, licences should be transferred to family members at no cost or requirement for training, as other assets would. Some Standard Taxicab Licence holders believe that the licence is their retirement pension and means to care for their spouse in the event of his or her death.

Standard Taxicab licensees argued that their families already possess a thorough knowledge of the taxicab industry and should not be required to complete a training program.

NUMBER OF TAXICABS

Initially, stakeholders from across the taxicab industry almost unanimously expressed that there are currently too many taxicabs in Toronto. Many expressed that, following the 1998 Review, the number of taxicabs began to increase beyond the necessary supply. Although the majority of drivers advised that making a living was challenging, several drivers advocated for the issuance of new licences to enable them to become taxicab owners.

Respondents suggested that a range of demographic and economic factors should be considered in creating a formula to issue taxicab licences. Some of these factors include population, inflation and driver incomes.

Some members of the taxicab industry expressed that there were simply too many taxicabs operating on the streets of Toronto and that the number should be reduced. A number of suggestions were received to remedy this, including: the elimination of Ambassadors Licensees; a reduction in the number of drivers or limit on the number of new drivers being licensed; or, limiting the number of taxicabs on the road by mandating that they could only operate at certain times or days.

Although most stakeholder input indicated that there were too many taxicabs and the City should reduce the number, a few suggestions advised that the City should deregulate the taxicab industry, removing restrictions on the number of taxicabs, such as in Melbourne, Australia and Dublin, Ireland.

NUMBER OF TAXICAB DRIVERS

Some taxicab industry members commented that an oversupply of drivers has contributed to higher rental and lease rates, and that the number of taxicab drivers being licensed should be limited, such as by limiting the number of training classes offered.

KEY PERSPECTIVES BY STAKEHOLDER GROUP

Opinions on licensing are highly divided by each group within the industry. The purpose of this section is to provide general opinions expressed from different members of the taxicab industry. These do not represent the opinions of any one member of the industry, but rather are a generalized collection of the most common positions.

Ambassador Licence

Many Ambassadors believed that there should be one type of owner's licence, the Standard Licence, and that Ambassador Licences should be converted to Standard immediately. They also expressed that if Ambassador Licences were not converted to Standard, then they should be assigned various characteristics of Standard Licences, such as transferability and the ability to hire drivers, either on a regular basis or in the event of owner injury or illness. Ambassadors also in general expressed that there were too many taxicabs in Toronto.

Accessible Licence

Many Accessible Licence holders thought that their licence should be converted to a Standard Licence or have more characteristics of the Standard Licences.

Brokerages

In general, brokerages supported the conversion of Ambassador to Standard Licences. Some stakeholders suggested that brokerages and garages have an interest in the conversion of Ambassador to Standard Licences, as Ambassadors will likely hire these businesses to find drivers for their taxicabs, with the drivers also paying a fee to brokerages, allowing brokerages to benefit financially from conversion.

Drivers

Many drivers expressed that the Ambassador program is not a failure and is a good idea. They see this program as one of their few opportunities to become a taxicab owner and would like the City to issue more Ambassador Taxicab Licences.

Standard Licence

Many Standard Taxicab owners expressed that there should be one type of licence, which should be transferable to a family member without requiring the family member to take a course or pay a transfer fee. Many also advised that there should be no limit on the number of owner's licences a person can hold and that licensees should be able to incorporate their taxicab licence for taxation and liability purposes. They expressed that when the City issues new owner's licences, they should be issued to licensees who were on waiting lists which existed in the past, rather than the existing Ambassador or Accessible Licence wait list.

Riders and the Tourism and Hospitality Industry

These stakeholders were generally unconcerned with types of licences and did not distinguish between Ambassador or Standard Taxicabs. An exception would be riders who require accessible service and the unique issues associated with this licence class.

CATEGORY 2: BROKERAGES AND DISPATCHING

BROKERAGE FEES

Drivers believe that brokerage fees are too high (both for dispatch and POS terminals) and the City should regulate these fees. Drivers expressed that brokerages raise fees too frequently and that different drivers are charged different fees for the same rental periods.

TREATMENT OF DRIVERS

Many drivers expressed that they felt poorly treated by brokerages. Specific complaints included dispatchers being verbally abusive and more valuable fares being distributed unevenly.

It was mentioned that some brokerages may unfairly penalize drivers due to customer complaints, without considering the driver's perspective. Drivers feel unable to address this issue with brokerages for fear of jeopardizing their ability to work for them or being given less work.

BROKERAGES AND BENEFIT PROGRAMS

Some drivers advocated that benefit programs should be funded by brokerages, although most stakeholders thought that any such programs should be maintained by the City of Toronto. One suggestion received was that City licensing fees should be used to create benefit programs.

A CITY DISPATCH CENTRE

Many participants suggested that the City should provide a central dispatch service for drivers, replacing private brokerages. The belief is that the City would charge lower dispatch costs than brokerages, provide drivers with better treatment and make it easier for City residents and visitors to obtain taxicabs.

THE ROLE OF BROKERAGES

Brokerages expressed that they played an important and necessary role in the taxicab industry that should continue as is. Some input indicated that brokerages should be better regulated to control brokerage fees, be more compliant with Municipal Code, provide better treatment and training to drivers, and ensure vehicles are well-maintained.

BROKERAGE SAFETY PROGRAMS

Some suggestions were made that brokerages could enhance driver safety by using GPS and radio technologies to determine the location and nature of potential emergencies, or have better radio protocols to communicate covertly with drivers about dangerous situations.

CATEGORY 3: DRIVER HEALTH, SAFETY AND LIVELIHOOD

A variety of suggestions regarding driver health, safety and livelihood were received. Most comments focused on the driver's inability to earn enough to maintain a reasonable standard of living.

In order to supplement the information received from consultations, a safety survey was mailed to all taxicab licensees. Staff received 3,616 completed surveys, providing insight on about a quarter of the Toronto's Taxicab Licensees; 2,155 taxicab Drivers, 698 Standard owners, 580 Ambassadors owners, 31 Accessible owners, 12 brokerages and others who did not identify or correctly identify themselves. The key survey results are summarized below together with other input.

ISSUES AFFECTING DRIVER'S HEALTH AND SAFETY

In order to make a decent wage, drivers expressed that they must operate too many hours a day, endangering their health and safety. Drivers also advised that they cannot stop to use washrooms frequently enough due to lack of access to washrooms and the fear of being ticketed if they exit their vehicle to find a washroom. A few suggestions were received that the City should provide fitness centres, or access to fitness centres, to improve driver health.

Many drivers also expressed that they work under stressful working conditions due to fear of fare jumping, robbery, assault, traffic and driving unsafe vehicles that are poorly maintained by fleet owners. A variety of suggestions were made to combat these issues, listed below.

RENTAL AND LEASING FEES

Drivers feel the rental and leasing fees they pay are too high and increase too frequently. Drivers argue that these fees should be regulated by the City of Toronto. They advise high fees make it difficult for them to make a good living and that many drivers are struggling financially, which contributes to the need to work long hours.

DRIVER RIGHTS AND DRIVER BILL OF RIGHTS

As a result of the 1998 Taxicab Review, all Toronto taxicabs have a Passenger Bill of Rights that outline the rights that passengers have within a taxicab. Many drivers reported poor treatment by riders and believe that there should be a Driver Bill of Rights in addition to the Passenger Bill of Rights, to make riders aware of their responsibilities within the taxicab, as well as the drivers' right to refuse service.

At the direction of City Council, the review team further engaged the industry for more input, presenting a Taxicab Bill of Rights displaying both driver and passenger rights and responsibilities, based on current legislation. The new Bill of Rights also included a warning that not paying a fare may lead to prosecution.

When the industry was asked again for more specific feedback on what the Bill of Rights should accomplish, many suggestions were received that it must make taxicab riders aware of appropriate behaviour in taxicabs, as well as

situations in which drivers may refuse to transport a passenger or end a trip. In addition to suggestions for riders, suggestions were also received that the Bill should outline the responsibilities of other industry stakeholders, such as garages, brokerages and agents, both with respect to driver treatment and the condition of the vehicle.

Some stakeholders were concerned that a “Driver Bill of Rights” might provoke more conflict with passengers, and suggested that one unified document for both drivers and passengers was a good idea.

EXPANSION OF RIGHTS AND PENALTIES

In the Safety survey, some drivers wanted changes to what they could do under the law. Some expressed wanting greater ability of drivers to refuse passengers who they believe are suspicious, such as those who are hiding their faces with hats and hooded shirts, or to prohibit passengers from sitting in the front seat.

Other suggestions were made that there should be harsher penalties for people who assault taxicab drivers, such as in some places in the United States, and that pictures of criminals should be downloaded from the taxicab cameras and shared publicly, both as a deterrent and to help apprehend offenders.

TAXI “TOKENS” CURRENCY

Several survey respondents suggested that taxicabs use some form of universal currency, similar to TTC tokens, which must be purchased in advance with acceptable ID, providing a record of the purchase. Alternatively, the City could create a mandatory taxicab passenger card that all taxicab riders must obtain, present and have swiped before starting their taxicab ride.

VOMIT OR SOILING FEE

Some drivers would like passengers to pay an extra fee if they vomit or soil their car. Drivers expressed that when a passenger vomits or otherwise damages their vehicle, it is a significant cost to them, as they must have the car cleaned before resuming operations.

PAYMENT IN ADVANCE TO REDUCE FARE JUMPING AND ROBBERIES AT NIGHT

Robbery and fare jumping, particularly at night, endanger drivers' safety and financial livelihood. A popular suggestion to address this is to allow drivers to ask for fare in advance, especially at night. Another suggestion was that the emergency lights system, currently on all taxicabs, should connect to the police.

Survey results showed that the majority of licensees strongly supported the ability of drivers to ask for payment in advance or pre-authorized payment at the beginning of a taxicab ride, with 69.7% support from all respondents.

SHIELDS, GPS AND OTHER SAFETY EQUIPMENT

Some drivers believe that additional equipment and technology would improve their safety, such as an in-car bullet-proof shield, GPS tracking of all cars, a safety system that connects to police and in-car cameras which record video and audio (not just images, as is the case now).

With regards to shields, consultation input was that drivers were divided on whether shields should be used in taxicabs. Some drivers advised that it would create a barrier between driver and passengers that would hamper customer service, making passengers feel too confined and as if they were in a police car. Drivers also expressed that they would feel too confined, or that the shield may make it difficult to exit the vehicle in the event of an accident, creating a safety concern.

Other drivers felt that a shield should be mandatory and was a good idea, but were concerned about paying for the equipment and believed that, if it became mandatory, that the cost would be passed on to the driver through increased rental or lease fees. Some drivers who were opposed to the shield felt that their behaviour was sufficient to mitigate most potentially dangerous situations.

Survey input reinforced this significant split in industry opinions on shields: drivers support mandatory shields, while all other licensees do not.

Results showed:

- 57% of **drivers supported mandatory shields**; while
- 51.6% of Accessible owners, 81.6% of Ambassadors, 70.2% of Standard owners and 91.0% of **owners did not support** mandatory shields; and
- Shield support also varies by when drivers operate, with 53.7% of nighttime drivers supporting mandatory shields, as opposed to only 39.6% of daytime drivers.

HOTEL PREFERENCES AND ILLEGAL PICKUPS

Many drivers believe that there should be more enforcement against illegal practices, particularly bribing hotel doormen in exchange for fares and illegal pick-ups by bandit taxicabs, limousines and taxicabs from other jurisdictions. Drivers also advised that some hotels prefer limousines and don't allow taxicabs from entering the hotel premises, which they feel is unfair and should be stopped.

UNSAFE FLEET TAXICABS

Some drivers expressed that the cars they rent from fleet owners were poorly maintained and unsafe. Drivers expressed that if they complained to fleet owners about condition, they were not permitted to work with them. Comments were received that fleet owners sometimes change their vehicles tires to new ones before a City vehicle inspection, and then change them back thereafter. Many drivers suggested better monitoring of the condition of fleet vehicles, such as through surprise garage audits.

CITY OF TORONTO SAFETY TAXICAB TRAINING

When survey respondents were asked about the safety training delivered in Taxicab Training, 75.3% of respondents thought that the safety training provided by the City of Toronto Taxicab Training Centre was sufficient, ranging from 70 to over 80% approval rating. Those who did not think it was sufficient had a variety of comments:

- Most comments expressed that improving driver safety required changes in areas aside from training. Suggestions included changes in legislation to protect drivers, quicker police response, addition of shields and cameras which record video and audio, and raise public awareness on the rights of taxicab drivers.
- Those who suggested changes to training advocated for greater emphasis on driver behaviour to prevent and manage conflict and to explain relevant changes in safety-related legislation.
- Others expressed that training was not necessary, as it could not prepare drivers for real life situations, and that drivers would learn about safety from their experiences working. Several people advised that CPR training was not useful, because in the event of an emergency, they would just call 911.

Some advised that the City should communicate important updates to drivers between Refresher training every four years, or instead of Refresher training.

MANDATORY POINT-OF-SALE TERMINALS

The safety survey asked if respondents thought POS terminals should be mandatory in order to reduce the cash carried by taxicab drivers. Respondents were split, with just over half of respondents (54.6 %) thought that POS terminals should be mandatory in all taxicabs, including 60.5% of drivers and 51.9% of Accessible owners and 52.1% of Standard owners and 72.7% of brokerages. Only 35.2 % of Ambassadors thought it should be mandatory. It should be noted that many drivers have reported high POS terminal fees as a deterrent to use them.

OUT-OF-SERVICE INDICATORS

To let a member of the public know that a taxicab driver’s shift is over, some drivers suggested that the taxicab should have an out-of-service sign on their roof light. It was suggested that this might cut down on the misconception that a customer is being refused for a ride and potential conflicts.

DRUG TESTING

A few suggestions were made that drivers should be subject to mandatory drug testing to ensure they are sober when operating the vehicle.

CATEGORY 4: AGENTS, LEASING AND GARAGES

ELIMINATION OF AGENTS

The vast majority of respondents believe that agents should be eliminated. A commonly expressed opinion was that agents do not enhance the industry and drive up costs to the driver, making it harder for a driver to make a living. Advocates of this position felt that lease agreements should only involve the owner and driver.

AGENTS FEES AND BUSINESS PRACTICES

Drivers reported that agents often are unwilling to provide receipts to drivers, which drivers need in order to claim business expenses for taxation purposes.

Drivers also reported that agents charge other fees that are not recorded in the agreement they provide to ML&S, such as annual "renewal fees" of up to \$10,000, and monthly cash payments above the price of the agreed lease. Drivers advised they are afraid to report this for fear that they will not be penalized through an increase in lease price or that the agent will find a way to cancel the lease or rental agreement.

Drivers advised that agents' fees are high and increase frequently and unreasonably.

Drivers would like the City to regulate lease and rental fees.

ROLES AND REGULATION OF AGENTS

A minority of responses advised that agents play a valuable and necessary role in the taxicab industry however they must be better regulated.

A large number of suggestions were received that the role and legal responsibility of agents should be more clearly defined, and that agents should have the legal accountability of owners. In order to ensure an agent properly maintains a vehicle, agents should have a limit to how many vehicles they can manage. Stakeholders also advised that agents, in addition to owners, should be penalized if the vehicles that they manage are not in good condition.

AGENTS AND INSURANCE

Insurance companies advised that agents were more likely than non-agents to allow drivers to operate a taxicab without first listing them on the insurance policy or ensuring that these drivers meet standards for insurability.

GARAGES

In general, stakeholders felt that garages should be regulated to enhance vehicle condition and treatment of shift drivers.

VEHICLE MAINTENANCE

Drivers felt that garages did not always effectively maintain vehicles and that if drivers complained about the vehicle condition, they would not be permitted to rent a taxicab with that garage, losing income. Drivers expressed that there should be a limit to the number of cars a garage can manage, and some suggested that their ability to manage vehicles should be dependent on the condition of vehicles, as measured through inspection.

Drivers advised that some garages put new tires on taxicabs in order to pass the mandatory bi-annual City vehicle inspections, thereafter replacing them with older, unsafe tires.

FEES TO DRIVERS

Drivers expressed that different garage fees are charged to different drivers and that fees are increased too frequently. If drivers complain, they advise they may not be permitted to work with a garage.

GARAGE REQUIREMENTS

Some stakeholders advised that garages should be required to have a minimum infrastructure and service, such as:

- a physical location;
- parking for taxicabs; and,
- an onsite mechanic.

CATEGORY 5: TRAINING, VEHICLE INSPECTION AND ENFORCEMENT

TRAINING

In general, the input received from stakeholders indicates that licensees are unhappy about attending training programs because of lost income; however, after attending training courses, participant surveys indicate that they found the classes informative, relevant and enjoyable.

Licensed Drivers and Owners

Stakeholders were interested in shorter courses and courses available online, as well as courses that are more directly relevant to their activities, e.g., non-driving owners did not want a course which discussed driving. They also suggested that Refresher courses (i.e., one- to three-day courses which taxicab licensees must attend every 4 years) should not be conducted in-person; instead, courses and/or updates should be delivered by web, email or mail-outs.

A summary of comments on training are to:

- shorten the driver Refresher course to one day rather than three;
- eliminate the Refresher course, or eliminate the requirement for non-driving licensees to attend courses;
- eliminate the requirement for licensees to take First Aid and CPR;
- make Refresher courses mandatory only for those who have committed a by-law infraction;
- have online courses and regular "challenge exams" to ensure licensees stay up-to-date, rather than classes which require drivers to take time off work and lose income;
- have content that is more relevant to their fields;
- eliminate the Refresher course (or components of the course) for non-driving owners;
- hire instructors who have worked in the taxicab industry or sub-contract the course to community colleges; and
- continue the Refresher course as is, as it provides important updates to the industry.

Input from other Stakeholders

Non-licensed stakeholders, such as the tourism and hospitality industry, advocated for more training and more in-depth training for drivers. Specific suggestions were to:

- incorporate more role-playing into customer service and communications training, so that drivers are more comfortable with providing service to customers;
- more accessibility training for drivers so that drivers are more comfortable with providing service to passengers with disabilities;

- better driving training, including interacting with cyclists and examination of violations drivers have committed;
- annual Refresher training; and
- require drivers to take a commercial vehicle driving course.

SAFETY TRAINING

As mentioned above in the Safety section, when survey respondents were asked about the safety training delivered in Taxicab Training, 75.3% of respondents thought that the safety training provided by the City of Toronto Taxicab Training Centre was sufficient, ranging from 70 to over 80% approval rating. Those who did not think it was sufficient had a variety of comments:

- Most comments expressed that improving driver safety required changes in areas aside from training. Suggestions included changes in legislation to protect drivers, quicker police response, addition of shields and cameras which record video and audio, and to raise public awareness on the rights of taxicab drivers.
- Those who suggested changes to training advocated for greater emphasis on driver behaviour to prevent and manage conflict and to explain relevant changes in safety-related legislation.
- Others expressed that training was not necessary, as it could not prepare drivers for real life situations, and that drivers would learn about safety from their experiences working. Several people advised that CPR training was not useful, because in the event of an emergency, they would just call 911.

Some advised that the City should communicate important updates to drivers between Refresher training every four years, or instead of Refresher training.

INSPECTIONS

Preferential Inspection of Vehicles

Some drivers advised that the ML&S Inspection Centre evaluates vehicles differently, showing preferential treatment to vehicles associated with certain brokerages or garages and/or persons with whom City staff have relationships. Suggestions included installing cameras in the Inspection Centre and rotating new City staff into the inspection centre every few years.

Inspection Follow-Up

Some stakeholders have advised that, after inspection, agents and garages sometimes remove new tires or equipment from taxicab vehicles and replace them with older ones in poor condition. Suggestions were made that there should be additional vehicle inspection outside of the biannual vehicle inspections, possibly by mobile staff.

ENFORCEMENT BY MUNICIPAL LICENSING AND STANDARDS

This section discusses enforcement of the Municipal Code Chapter 545 by Municipal Standard Officers (MSOs). Many stakeholder comments grouped the Toronto Police Service officers into the same category as MSOs, so there was some overlap on input received for both.

Enforcement of Taxicabs

A great number of licensees felt that drivers received too many tickets from MSOs and expressed that MSOs should provide more warnings and education and fewer tickets. Licensees expressed that MSO vehicle inspections often resulted in the issuance of multiple tickets, which are expensive.

Drivers also felt that they should only be ticketed for offences which endanger public safety; they believe that other issues, such as having a missing Tariff Card or stickers, should be only incur a warning and a work order.

One example of this pertains to taxicab stands, which specify the maximum number of cars that are permitted to wait for passengers. Many drivers expressed that they are frequently issued tickets for overcrowding the stand. Drivers feel that this offense is unfair, because they believe that there are not enough taxicab stands and stand overcrowding is an unavoidable part of their business.

Some drivers advised that, if they refuse to drive a mechanically unfit vehicle at garages, garages will not allow them to drive. As such, they expressed that they should not be ticketed for a vehicle in poor mechanical condition, and that the accountability should be on owners, agents and garages.

Some drivers expressed that MSOs are rude to them and that they should focus on education more than enforcement.

Enforcement of Other Vehicles

Many drivers expressed that MSOs should focus on eliminating "bandit" taxicabs, vehicles illegally operating as taxicabs, both from passengers who hail them on the street ("flags") and from advertisements at local stores and in community newspapers.

Drivers reported that limousines regularly pick up non pre-arranged passengers, which is not permitted by City By-law. Taxicab drivers stated that this cuts into their incomes and would like to see stricter enforcement on this issue.

Drivers reported that taxicabs from other jurisdictions also regularly pick up "flags" in busy areas and that ML&S enforcement does not take enough action to stop them.

Enforcement Information

It was suggested that enforcement information should be easier to access and share. Specifically, participants asked for a more easily accessible complaints process, making it easier to file and track complaints, compliments and comments, both about licensees, City staff and MSOs. Various members of the industry expressed a desire to issue complaints about other licensees for unfair or illegal business practices. Suggestions were also received that this process and information should be more accessible to persons with disabilities.

Tourism Enforcement Perspective

Various tourism and hospitality industry stakeholders expressed that there should be more enforcement on the taxicab industry, particularly for cleanliness of the vehicle and customer service issues.

TORONTO POLICE SERVICE ENFORCEMENT

In general, the taxicab industry felt that there was not a good relationship between police and drivers, that drivers are over-ticketed and that steps need to be taken to improve this relationship.

Drivers had a number of suggestions specifically for the police with regards to ticketing:

- **Less ticketing:** A number of licensees felt that drivers received too many tickets from police and expressed that police should provide more warnings and education, and issue less tickets.
- **Treatment by police:** Some drivers expressed that police could treat them with more sensitivity; providing more education and encouragement and fewer tickets and fines.

Many stakeholders expressed that they wanted to improve the industry relationship with police, such as through partnership organizations. Some stakeholders mentioned "Drivers on Patrol", a program which used to exist in Toronto in which drivers provided tips to police to help them reduce and prevent crime. Drivers felt that if police better understood their profession and challenges, they would be less likely to ticket them or treat them poorly.

CATEGORY 6: CUSTOMER SERVICE, TOURISM AND HOSPITALITY

While individual taxicab riders seemed generally satisfied with Toronto's taxicabs, the tourism and hospitality industry expressed that there were several opportunities to improve the service and industry overall.

THE RIDERS' PERSPECTIVE

To engage riders, City staff conducted three types of customer service surveys: a passenger survey about customer service in general; an exit interview survey administered immediately after passengers exited a taxicab; and, a mystery rider surveys in which City staff secretly rated rides.

Overall, results indicated that riders were generally very satisfied with Toronto's taxicabs, including customer service, driver's knowledge and vehicle condition. Highlights of the surveys are included below:

1. The Passenger Survey:

- **Friendliness and professionalism:** Riders were asked, "In general, are Toronto taxicab drivers friendly, polite and professional?" in which 87% of respondents said "yes". The 13% that answered "no" described drivers as rude and complained about drivers using their cellular phones during the rides.
- **Safe driving:** Riders felt that only 65% of drivers drove safely and professionally, highlighting a major concern that 35% of drivers were driving unsafely and/or aggressively.
- **Car cleanliness:** Several riders commented that taxicab service could be improved by ensuring that cars are cleaner.

2. Exit Interviews

Results of the interviews were very positive. Most people in Toronto feel like taxicabs are clean, well-maintained, and have professional drivers who are knowledgeable of the City. One area that could be improved was cellular

phone usage by drivers; in spite of the by-law that prohibits driver cellular phone usage while transporting passengers (except in the event of an emergency), 21% of respondents reported that their drivers spoke on cellular phones during their rides.

Most people said that they felt their taxicab ride was a good value, but that a lower fare might incentivize them to take taxicabs more frequently in the future.

Survey responses also indicated a high level of satisfaction in key customer service areas; some examples are that:

- 100% of taxicabs were reported to be clean and well maintained;
- 100% of drivers were reported to be professional; and
- 86% of taxicabs were available in less than 10 minutes.

3. **Mystery Riders:**

100 mystery rides were conducted by staff which showed very high levels of customer service overall. As in the interviews with passengers, the mystery rides illustrated an issue with cellular phone usage, finding that drivers spoke on their cellular phone in 14% of mystery rides. Other results included high levels of customer service and safety, such as that seatbelts were easily accessible, wait times were low and that there were few payment issues. Specific results include that:

- 100% of taxicabs had seatbelts available;
- 90% of taxicabs were available in less than 10 minutes;
- 94% of drivers were knowledgeable of the City; and
- 88% of taxicabs were clean and well maintained.

Further to these surveys, the consultant Taxi Research Partners (TRP), conducted additional public surveys, engaging over 1200 respondents. Their results also indicated a high level of rider satisfaction with Toronto taxicabs with respect to customer service, wait times and availability. TRP report is in Appendix B.

TOURISM AND HOSPITALITY PERSPECTIVE

The main priority from the tourism and hospitality industry was to see an improvement in the customer service from drivers. Some suggestions included:

- **Providing better recommendations:** Drivers could provide better recommendations on what to do and where to eat.
- **Drivers as City representatives:** Drivers should recognize the importance on their role for the City, especially because they may be the first person in Toronto that visitors interact with.
- **Telephone usage:** Drivers needed to refrain from using cellular phones while transporting passengers.

Stakeholders believed many of these issues could be addressed through more in-depth training, customer service role playing and stricter evaluation of the taxicab driver's skills. They also suggested that there be better incentives for drivers to provide good customer service, such as a rewards system from the City.

INCENTIVES FOR GOOD CUSTOMER SERVICE

Tourism stakeholders discussed creating rewards and incentive programs for drivers to encourage them to provide better customer service. This might include accumulating points for good service which can provide them with a reward, such as a discount on their licensing fee.

VEHICLE CONDITION

Respondents generally thought the condition of the vehicle was good and much better than prior to the 1998 Review; however, some riders believe that there are still some taxicabs which are in poor condition. Tourism stakeholders suggested that more frequent vehicle checks could address this.

OTHER IDEAS TO IMPROVE CUSTOMER SERVICE

A number of suggestions were made to enhance the tourist experience, such as:

- **Better technology:** Use in-car technology to help track complaints.
- **Central dispatch and compliments-complaints line:** Create a single telephone number tourists could call to order a taxicab or make compliments or complaints. This central dispatch could be especially useful in other ways, such as during large events, such as conventions, to alert the taxicab industry that an estimated number of taxicabs will be needed at certain locations at certain times. Suggestions were made that the City should assist with creating this.
- **Ability to find drivers who speak their languages:** Create a service in which tourists could find a taxicab driver who speaks their native language.
- **Feedback portal:** Create a single portal to gather information about the taxicab experience, collecting information about the tourism and hospitality industry based on customers' taxicab experiences.
- **Taxicab industry involvement:** Get members of the taxicab industry involved in responding to complaints received by the City.
- **Tourism-taxicab industry communication system:** When large events, such as conventions, are happening within the City, there should be a way to alert the taxicab industry that an estimated number of taxicabs will be needed at certain locations at certain times. Suggestions were made that the City should assist with creating this.

CATEGORY 7: RELATIONSHIP WITH THE CITY OF TORONTO

THE TAXICAB ADVISORY COMMITTEE AND STAKEHOLDER INVOLVEMENT WITH THE CITY

Formal and Regular Interaction

Taxicab stakeholders were interested in becoming more involved with the City on a regular basis and in a formal capacity, in which stakeholders are more aware of what is happening in the industry and in which they have more input in changes being made to the industry.

Taxicab Advisory Committee

Many stakeholders advocated for a creation of taxicab advisory committee, similar to organizations in Mississauga and New York, providing recommendations to the City on the industry. Different suggestions were received for its composition, but it was generally agreed that it would be comprised of stakeholders from the various licence categories, as well as City staff, police, tourism and hospitality agencies and possibly councillors.

In response to the input for a Taxicab Advisory Committee, City Council directed ML&S to create a Taxicab Advisory Committee (TAC), to communicate between the taxicab industry, the riding public and the City of Toronto, and will act in an advisory capacity to the Executive Director of ML&S. The taxicab industry had the following further input:

- **Composition:** Different suggestions were received for TAC composition, but it was generally agreed that the TAC would be comprised of stakeholders from the various licence categories, as well as City staff including enforcement, police, tourism and hospitality agencies and possibly councillors. Some people suggested that the number of member spots in each licensee category should correspond to the number of licensees in the industry, while a few comments were made that the number of licensee spots should take into consideration different group's financial stakes in the industry.
- **Reporting Structure:** Many stakeholders expressed the importance of ensuring councillors would receive input from the TAC. Some stakeholders thought that the TAC should report directly to City Council or the Licensing and Standards Committee (LSC), rather than to City staff. Although a few stakeholders mentioned that they would not participate if the TAC did not report to councillors, most people agreed that it would be better to move forward and create the committee, regardless of who it reported to.
- **Similar organizations in other places:** Many stakeholders advocated for a creation of a taxicab advisory committee similar to organizations in Mississauga and New York. Stakeholders mentioned that some committees included limousines, livery services and public transit. They also referred to committees in which roles extended beyond the advisory capacity outline in Toronto's TAC draft Terms of Reference, with the committee having abilities of Toronto's Licensing and Standards Committee and Licensing Tribunal. Some of the functions mentioned included approval of legislation and review of grievances. Some committees were also reported to vote on recommendations. One suggestion is to move toward making the industry self-regulating.
- **Membership acquisition:** Some stakeholders thought the industry should be involved in choosing applicants.
- **Driver attendance:** Some stakeholders explained that money lost due to time spent of the committee is a barrier to entry for drivers, suggesting they should be compensated.

- **The Previous Committee:** A few persons suggested it should be reinstated.

OPEN, TRANSPARENT AND INCLUSIVE PROCESSES

Taxicab stakeholders would like the City to be more open, transparent and inclusive, with a variety of suggestions:

Communication

Input stated that the City should better communicate events, changes and proposed changes to the taxicab industry, providing all stakeholders with an opportunity to get involved. Some criticism received advised that information about the review consultations could have been better communicated.

Open Consultations and Meetings

Stakeholders would like all consultations and meetings to be open to whoever would like to attend, or in the instance in which one licensee group has a meeting, that all licensee groups should be given the same treatment.

CATEGORY 8: ISSUES OUTSIDE THE JURISDICTION OF THE CITY OF TORONTO

INSURANCE

Cost and Choice

Many driving licensees expressed that there are too few insurance companies to choose from and as a result, that the cost of insurance is high. Drivers are also dissatisfied with the differential rates charged to drivers based on their licence type, and advise that, if one company won't insure you, it is difficult to obtain coverage with another.

Insurability and Licensing Requirements

Insurance companies have standards for insurability which are not always in line with City of Toronto taxicab licence standards. This leaves some licensed taxicab drivers uninsurable, and thus, unable to driver a taxicab. Some insurance companies reportedly require drivers to be at least 23 years old with three years of previous personal Canadian insurance coverage or one year of commercial driving insurance. Most stakeholder comments were that the insurability requirements were too strict.

AIRPORT

Drivers would like to be able to pick up at the airport without pre-arrangement or a fee. Toronto taxicab drivers can presently drop off passengers at Toronto Pearson International Airport, however can only pick up a passenger if the ride is pre-arranged; in this case, the driver must go to a specific waiting area and pay a fee. Drivers consider this unfair and would like the City to re-examine its powers and advocate to other levels of government.

CATEGORY 9: OTHER BYLAW ISSUES

TAXICAB STANDS

More Permanent Taxicab Stands

Industry stakeholders unanimously commented that more taxicab stands are needed, with better integration of taxicab stands into the City's infrastructure. Locations such as hotels, entertainment and business districts, TTC subway stations and shopping centres should be considered. They advised that an increase in the number of well-placed taxicab stands would:

- allow drivers and the public to more easily and safely connect, particularly at night;
- reduce the fuel cost and fuel usage of taxicabs, benefitting drivers and the environment; and
- better integrate taxicabs as part of the City's public transportation network.

Temporary Taxicab Stands and Marshalling Areas

At peak times and for large events, some suggested that there should be temporary taxicab stands or marshalling areas. One such suggestion is that there should be marshalling areas in the entertainment district.

Taxicab Stand Domination by Brokerages

Some drivers reported that certain brokerages dominate certain taxicab stands and make other drivers feel unwelcome, and that they believe taxicab stands should be open to everyone.

FARES

Increasing and Decreasing the Fare

Participants from many segments of the taxicab industry argued in favour of a lower fare to increase taxicab ridership and affordability. A great number of drivers remarked that recent fare increases have had a negative impact on their livelihood, although some drivers were afraid that lowering fares would adversely impact their income.

Tourism and hospitality stakeholders expressed that they thought the fare could be lower, and that other fare systems could be explored, such as flat rates or jitney programs.

Impact of high fares:

- Drivers advised that lower fares might increase driver incomes by encouraging more people to take taxis while other drivers worried that it may negatively affect income.
- Drivers advised that agents and garages used increases in fares as a justification to increase their shift rental fees.

FLAT RATES

The review team received both negative and positive feedback on flat rates. Some licensees and the tourism industry felt that flat rate systems would help to increase ridership and income and advocated for flat rates.

Other drivers argued that existing flat rates fares, such as to Toronto Pearson International Airport, or as part of a brokerage-negotiated agreements, did not provide drivers with sufficient compensation for their trip. Drivers also stated that it was unfair that, if the meter was higher than the promised flat rate, that the customer could pay the flat rate.

IDLING

Taxicab drivers expressed that taxicabs should have an exemption from the idling bylaw due to the long periods of time they spend in their vehicles, often during extreme cold and heat.

LICENSING FEES

Some stakeholders expressed that the City's licensing and renewal fees are too high and paid too frequently.

BUSINESS LICENSING THRESHOLDS AND PENALTIES

Several stakeholders suggested that the City review the Business Licensing Thresholds and system of penalizing licensees. Some input advised that the City should review and reduce the list of by-law infractions for which drivers could be ticketed, with special attention to those infractions that do not relate to safety.

INDUSTRY SUBSIDIES AND INCENTIVES

Several stakeholders suggested that the City should provide subsidies to licensees to help offset the cost of purchasing an accessible vehicle, or rising fuel costs.

CATEGORY 10: VEHICLES – STANDARDIZATION, SAFETY & TECHNOLOGY

STANDARDIZED TAXICABS: MODEL

Nearly every member of the taxicab industry voiced opposition to having a single make and model of vehicle for all taxicabs. Drivers, brokerages and taxicab license holders (both standard and ambassadors) argued that a dedicated taxicab vehicle would increase their costs and reduce choice for drivers and consumers. The accessible community was in favour of a dedicated vehicle if it was wheelchair accessible.

STANDARDIZED TAXICABS: HYBRID/FUEL EFFICIENCY

Stakeholders from all segments of the taxicab industry agreed that fuel-efficient taxicabs, such as hybrid cars, should be encouraged. Hybrids and smaller vehicles save the driver money on fuel and improve the environment.

Industry stakeholders argued that the City should provide an incentive for purchasing hybrid vehicles due to the perceived higher purchase and maintenance costs in comparison to non-hybrid vehicles. Some shift drivers worried that more expensive vehicles could lead to higher shift rental fees.

A DEDICATED TAXICAB VEHICLE COLOUR OR MODEL

This section discusses the idea of the City of Toronto having taxicabs which are one colour, one vehicle model or one vehicle model and one colour.

Tourism and Hospitality - Good for City but Not a Priority

The tourism and hospitality industry indicated that a standard colour of taxicab, or standard model of vehicle would be a good move for Toronto and would help to establish taxicab branding for Toronto which would enhance the industry, such as by making it easier for tourists to easily recognize taxicabs.

However they did not see it as a priority for taxicab service in Toronto, prioritizing customer service as the most important factor in improving service today.

Drivers – Good for Business but Paid For By Drivers

Drivers advised that a one-colour taxicab would be good for business and tourism, however expressed that it may be more difficult for customers to find companies with whom they have taxicab vouchers, or for customers to choose brokerages whose service they enjoyed. Shift drivers also believed that any changes to City requirements for colour or vehicle would result in higher rental fees to drivers.

Brokerages Viewpoint – Decreased Business

Brokerages echoed these concerns, adding that a one-colour system or a single colour or single type of dedicated vehicle would negatively affect their businesses financially. Brokerages have invested greatly in building their brand identity and customer base; they believe standard colours or models would make taxicab vehicles less recognizable and decrease their volume of business.

Public Safety – Harder to Recognize Cars

One model or colour would make it more difficult for passengers to identify taxicabs in the event of an accident or find lost property.

All Accessible Vehicles

Some suggestions were received that all taxicab vehicles should be accessible to ensure that the City could easily provide on-demand accessible service. Industry stakeholders suggested that this would be costly to them and that taxicab riders enjoy choosing the vehicle they prefer.

Via a ridership survey, riders were asked, "If the City of Toronto were to introduce taxicabs that are wheelchair accessible for use by both the general public and people with disabilities, would you use the service?" While the majority of riders, 72%, said yes, 28% of riders said no, advising that they did not want to take the service away from those who needed accessible service, and also that they didn't want to take vehicles intended for persons with disabilities or the elderly.

VEHICLE FUEL SYSTEMS

This was not a widely discussed topic, however it was generally agreed upon that fuel-efficient taxicabs, such as hybrid cars, should be encouraged, saving the driver money for fuel and benefitting the City environmentally by reducing emissions.

Comments were received that the City should provide an incentive for purchasing hybrid vehicles due to the perceived higher purchase and maintenance costs in comparison to non-hybrid vehicles. Shift drivers also believed that any changes in City requirements for fuel systems would result in higher rental fees to drivers.

SAFETY EQUIPMENT

Some drivers believe that additional equipment and technology would improve their safety, such as an in-car shield, GPS tracking of all cars, a safety system that connects to police and in-car cameras which record video and sound (not just photos, as is the case now).

TECHNOLOGY

GPS

Some industry stakeholders believe that GPS should be mandatory in all taxicabs. Advocates suggested that this would improve driver safety, and improve customer service. This idea is also popular with the riding public.

Point-of-Sale Terminals

A number of suggestions argued for mandatory Point-of-Sale (POS) terminals to allow debit and credit transactions. Some drivers expressed that brokerages and financial institutions charged high fees for the use of POS terminals and that drivers the POS surcharge charged to customers, often \$1 or \$1.50, discouraged passengers from tipping drivers, reducing their income.

CATEGORY 11: ACCESSIBILITY

NUMBER OF ACCESSIBLE VEHICLES

All comments received tend to agree that more accessible taxicabs will be needed to provide on-demand taxicab service, though no specific numbers were suggested. Input received suggested that the City should consult with a range of stakeholders to determine that number, such as accessible riders, advocacy groups, healthcare institutions and brokerages.

Two accessible brokerages advised that they were unable to service some calls due to an insufficient number of accessible vehicles. In such instances, accessible riders advised that they call around to find another provider, including a livery service if necessary.

ACCESSIBLE TAXICAB LICENCES ISSUANCE TO BROKERAGES

Some stakeholders feel that brokerages should not be able to obtain Accessible Taxicab Licences, arguing that the practice is unfair.

Several brokerages expressed that, in order to provide on-demand accessible service, they have to hold Accessible Taxicab Licences, arguing it is the only way that they could be accountable for service provision and prioritizing accessible fares.

STRATEGIES SUGGESTED TO ENSURE ON-DEMAND ACCESSIBLE SERVICE

Stakeholders suggested that the City should allow an unlimited number of Accessible Taxicab Licences and some suggested that interested drivers should be able to obtain an Accessible Owner's Licence. Many accessible vehicles would then become available and then there would be enough vehicles to provide on-demand service.

Comments were received that accessible training should be mandatory for all taxicab drivers, ensuring that accessible vehicles are available for the maximum amount of time.

Suggestions were received that accessible taxicabs should be 'dual purpose', permitting them to pick-up anyone. Some brokerages expressed that, in order for accessible taxicabs to be profitable, they should be allowed to pick up all passengers (in addition to just accessible fares). Some Accessible owners/drivers disagreed with this point, saying that the accessible taxicab business can be profitable and that those drivers working with TTC Wheel-Trans are very busy throughout their entire shift.

A few suggestions were that the City could provide an incentive for vehicles to operate during non-peak times.

Brokerages should be required to be affiliated with a certain number of accessible vehicles, either through licence ownership or service agreements. Creating a ratio of accessible to non-accessible vehicles within a brokerage would ensure a minimum number of accessible vehicles operating at all times.

In order to ensure that drivers prioritize accessible fares to other fares, drivers should receive government subsidies for accessible fares of \$5 to \$10, such as from the TTC.

Some suggestions were received that all taxicab vehicles should be accessible to ensure that the City could easily provide on-demand accessible service. Many industry stakeholders suggested that this would be costly to them and that taxicab riders enjoy choosing the vehicle they prefer.

BRAILLE

While visually impaired riders disagreed on whether it was necessary, the Canadian National Institute for the Blind (CNIB) strongly advocated for Braille advisories, including the taxicab vehicle number, who to contact if there is an issue and where to find more information. CNIB explained that visually impaired passengers may be hesitant to ask a driver for taxi information if there is a problem, so Braille would help to ensure they receive accurate information, as well to deter any taxicab drivers who might consider any wrong-doing.