
Ground Transportation Review

FINDINGS REPORT

Attachment 1
City of Toronto
September 2015

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Introduction

At its July 2015 meeting, City Council directed Municipal Licensing and Standards (ML&S) to undertake a review of the operations of Uber and similar technology-based companies, including the interests of the public in the technology and impacts on the current taxicab and limousine industries.

The directive requested a report back to the September 18 meeting of Licensing and Standards Committee on matters related to bringing new and emerging technologies into regulation, and ensuring a level playing field is established.

The key foundational aspect of this request, which also relates directly to municipal purposes for regulating businesses, was: *ensure public safety and consumer protection are maintained.*

During the months of July and August, 2015, City of Toronto staff conducted a Ground Transportation Review of taxicabs, limousines and Uber. This review included: conducting stakeholder roundtables, posting online surveys and procuring independent research with the public and industry on this matter.

This report provides an overview of the current state of the City of Toronto's taxicab and limousine industries, and the operations of Uber in Toronto.

This report, and accompanying appendices, outlines the results of the industry stakeholder and public engagement activities that were undertaken.

It provides a jurisdictional scan of regulatory models and approaches taken across the world.

This report makes recommendations to reduce regulations on existing taxicab and limousine industries, while creating a regulation to permit "private vehicles-for-hire", such as UberX, as a new type of ground transportation business that is distinct from the existing taxicab and limousine industries.

The Toronto taxicab and limousine industries employs or supports approximately 25,000 individuals and families. They are represented as Standard Taxicab owners, Ambassador Taxicab owners, Toronto Taxicab Licence Taxicab owners, Taxicab drivers and Brokerages and Fleet garages who each employ hundreds of individuals. The Limousine industry is supported by Limousine owners, Limousine drivers, Limousine Service Companies and all of the related administrative and mechanic staff in each industry.

The City of Toronto has regulated the taxicab and limousine industries for more than 100 years. Toronto licenses and limits the number of vehicles that transport passengers for a fare. The authority to do so is laid out in the *City of Toronto Act*. The regulations for taxicabs and limousines have undergone numerous regulatory changes throughout the years, with the most significant reforms having occurred in 1998, 2005 and 2014.

The existence of unlicensed persons transporting passengers in their personal vehicles for compensation is not new. It has happened for decades, and was typically referred to as 'bandit' cabs. These operations were localized, typically found in grocery store parking lots, and were also found to be offered through classified ads in local newspapers. New technologies are allowing 'bandit cabs' to operate more easily and at a scale once unimaginable.

The fundamental difference between the taxicab and limousine industries is the nature by which they connect with passengers. Taxicabs are the only vehicles permitted to pick-up passengers hailing on the street or wait at cabstands for passengers. Limousines must be pre-booked and must charge a minimum fare of \$70/hour. As such, the industries are experiencing differing impacts as a result of the operations of Uber.

Uber operates in Toronto by utilizing application software that dispatches vehicles to passengers. In 2012, UberBlack launched in Toronto by dispatching limousines to passengers. In 2013, UberTaxi began dispatching taxicabs to passengers. In September 2014, UberX began dispatching unlicensed, personal vehicles to passengers. Uber is currently operating unlicensed in the City of Toronto.

Through the Taxicab and Limousine Industry consultation process, it became clear that:

The industries are vehemently opposed to an expansion of ground transportation options, such as private vehicles-for-hire. The current taxicab and limousine industry representatives stated clearly their desire to have Uber banned from operating UberX.

The City should continue to limit the number of taxicabs allowed to operate in the City. Most jurisdictions still restrict the number of taxicabs allowed to operate. It has been the premise that restricting the number of taxicabs mitigates traffic - especially downtown – and helps ensure that taxicab drivers can make a living wage that supports good driving behaviour and higher vehicle maintenance.

The Taxicab tariff and Limousine rates should be adjusted to respond to the public's interest. Many industry participants agree that the currently mandated taxicab and limousine fares ought to be revisited. There was no consensus or proposal from the industry on how this should be accomplished, but simply that, they are being impacted due to the lesser fares charged by Uber with their UberX service.

Throughout the public consultation process, it became evident that:

The opportunity to obtain a cheaper fare is attracting consumers to this private vehicle-for hire option. The taxi rates (tariff) in Toronto have been historically set by regulation, determined by the operating costs of taxicabs, and with consideration to affordability for the consumer and reasonable living wage for the driver. The costs of operating a taxicab are significant (leasing or purchasing a vehicle, vehicle maintenance, equipment, "plate rent" and commercial insurance). This new alternative service of a private vehicle-for-hire does not bear many of these costs, and therefore can offer a reduced fare to accomplish the same goals.

Technology can provide a number of public safety and convenience benefits.

Technology provides new tools that empower passengers. Technology has been used by some brokerages to allow passengers to identify the proximity of the ordered taxi and identify the driver, provide an electronic record of the trip, allow passengers to share their location in real time, and eliminate the need to carry cash for the transaction. There is an element of trust that develops with users of the application.

Quickly evolving technology is enabling people to "share" assets like vehicles, houses, parking spots and tools. This can be considered part of a larger movement called the 'sharing economy'. Uber's services are popular with the public, especially the younger generation. This popularity has fostered a quick expansion of these services, and has generally brought to the fore, issues the public has with the established and regulated taxicab industry.

Summary:

Around the world, established taxicab and limousine industries are being challenged by new entrants, like Uber. A number of jurisdictions, primarily on a countrywide basis in Europe, have imposed bans on these operators, while other jurisdictions, primarily in the United States (both at municipal and state level) have created regulations that permit new ground transportation options.

Ground transportation in Toronto has changed. This provides the City with an opportunity to take a fresh look at the approach by which the City is regulating the taxicab and limousine industries. This report recommends two initiatives to review the regulation of both the taxicab and limousine industries. These reviews may provide ground transportation industries an opportunity to develop efficiencies, enable competitiveness and reduce regulatory oversight.

The City needs to continue a path to service equivalency for metered on-demand wheelchair accessible taxicab service. This report speaks to the review that is needed to understand the current state of accessible taxicab service. At a recent Disability Issues Committee meeting, staff were advised that despite the City now having approximately 10% of the taxicab fleet accessible, that service was still not being received. It is important that efforts to ensure equal access to services for those with mobility challenges are continued.

The interests of the public and their safety needs to be addressed. The use of technology is challenging established industries, highlighting the need for them to adapt in order to compete. In turn, regulators must also contemplate updating regulation to be more reflective of the changing landscape.

2015 Ground Transportation Review Process

At its meeting on July 7, 8 and 9, 2015, City Council directed ML&S to undertake a review of the operations of Uber and technologies like it, including the interests of the public in the technologies and their impacts on the current taxicab and limousine industries.

The review was directed to include:

- What bylaw changes are necessary to bring new and emerging technologies into regulation as part of the City's for-hire ground transportation industry;
- How the City can ensure public safety and consumer protection are maintained;
- How the City can ensure a level playing field is established and maintained with respect to commercial insurance, driver training, equality of fares and other licensing issues; and
- Ensure the recommended changes are reviewed at least every five years, or when deemed necessary before that time.

Between July and September of 2015, staff undertook consultations and research that formed the basis of this report. This work is detailed below.

Conducted stakeholder meetings

During July and August, staff engaged 80 participants through 7 stakeholder meetings with taxicab and limousine industry representatives. Stakeholders included: taxicab drivers, taxicab owners, limousine industry representatives, taxicab brokerages other special interest groups.

In addition to these meetings, staff held three additional meeting with executives from Uber, Lyft and GataHub respectively. These meeting sought to understand business operations, technology capability and issues of public safety and consumer protection, including insurance coverage.

Created a dedicated website

Provided an overview of the process, including scope of review and ways to participate.

Posted an online survey for the public

During August, staff posted an online survey for the general public. There were over 73,000 responses collected on the opinions of Toronto's ground transportation system.

Posted an online survey for industry stakeholders

During August, staff also posted an online survey for industry stakeholders. This survey resulted in over 6,300 responses from industry stakeholders.

Ipsos Reid Research

Ipsos Reid was procured by the City to conduct independent research for the Ground Transportation Review. Ipsos Reid conducted both qualitative and quantitative research through surveys, focus groups and interviews.

Ipsos Reid conducted:

- **Survey:** Representative online survey of 1,000 Toronto residents; Ipsos verified that the sample is representative of the population of the City of Toronto by age, gender and region.
- **Focus Groups:** 6 focus groups with residents of Toronto, taxicab/limousine users and Uber service users.
- **In-Depth Interviews:** In-depth interviews - 6 with taxicab drivers, 6 with limousine drivers, 6 with UberX, UberXL, UberSelect drivers and 6 with accessible taxicab users.

Summary of Industry Consultations

Industry Stakeholder Roundtables and Meetings

Summary of Findings

City staff undertook a series of industry participant stakeholder roundtables to seek information related to the impact of Uber operations on taxicab and limousine industries and to discuss how the City might consider a change to regulations to 'level the playing field'.

The roundtables were facilitated and documented by members of the City's Public Consultation Unit.

Date	Time	Meeting type	Stakeholder Group
July 27	2:30pm – 4:00pm	Roundtable	Drivers
July 28	2:30pm – 4:00pm	Roundtable	Toronto Taxicab Alliance
July 30	8:30am – 10:00 am	Roundtable	Standard Owners
July 30	10:30 am – 12:00pm	Roundtable	iTaxiworkers and owner/operated taxicabs
Aug 5	10:30 – 12:00pm	Roundtable	Limo Industry
Aug 5	1:30 – 3:00pm	Roundtable	Taxi Brokers
Aug 6	10:30am – 12:00pm	Roundtable	Fleet Operators
Aug 27	3:00 – 4:00 pm	Meeting	Limo Industry Representatives
Sept 3	1:00 – 2:00 pm	Meeting	Toronto Taxi Alliance

During the Roundtable meetings, all participant groups were asked to respond to the same three questions. A number of the comments that were consistent across all industry participants are summarized below.

1) How have you been impacted by the operations of Uber?

Consistently, it was difficult for industry participants to provide factual information/data to demonstrate the financial impact, though generally all indicated that the industry is losing income at all levels. The general extent of which ranged from 20 to 40% impact.

- Losing income and business because customers are looking for cheaper prices for rides. The rate needs to go down.
- Because of Uber there are longer wait times for fares. The effect is that some drivers aren't driving and cabs are sitting in lots. Night drivers are most impacted and there are less street hails.
- Maintenance costs are high and they can't compete with Uber's rate.
- Drivers' income is down and they are no longer working for the fleet operators.
- There is less demand for taxis as the market is saturated, drivers are frustrated and are quitting. The number of unused taxis is growing.
- As a regulated industry it is a challenge to compete with Uber which means lost income and lower shift rental rates.
- Taxi industry is more affected than the limo industry.

2) If City Council permitted UberX, what would you need to better compete?

Every participant group took immediate and significant offence to this question, but then provided some of the following:

- Fare structure should be the same.
- All drivers should require commercial insurance and training.
- Uber needs to have the same regulations and restrictions as the rest of the industry. Uber's pricing should be consistent with taxi prices. All vehicles should have the same licence.
- Licensing fee, refresher courses, accessibility and insurance costs all need to change. Or requirements need to be consistent for Uber.
- Lower meter rates and get rid of training or allow brokerages to train may help.
- Reduction of regulatory costs is needed.
- Force everyone to have the same regulation.

3) There are a number of regulations on taxicabs and limousines in place right now that protect the public, what needs to change and/or what needs to stay?

Overall industry participants thought that the safety measures existing in taxicabs were necessary for driver safety, and did not provide a great deal of suggestions to change, but did comment generally as follows:

- Safety requirements should be the same for all drivers.
- The City should require that Uber operate the same way as the rest of the industry. There is a lack of enforcement. If regulations are not enforced why should drivers follow them?
- A rate review is needed.
- If fares are reduced, driver expenses need to be reduced.
- Public safety measures not covered by Uber need to be determined. Educate the public on UberX liability.
- Get rid of refresher course. Keep training and focus on geography and customer service.
- Refine and reduce loopholes in bylaws.
- Driver training. It takes too long and is costly. Companies could offer their own in-house training.
- Would like to see the City get back to basics with regulation and just regulate to protect the public safety not the market.
- There needs to be a minimum regulation for rates for limos. If the City takes away the minimum fare and driver training, there will be more competition at lower rates.
- Taxis and limos are different and such have different bylaws.

Ipsos Reid Industry Research

The City contracted with Ipsos Reid to undertake 6-8 in-depth interviews with Taxicab and Limousine drivers. A summary of these findings are provided below.

Common comments attributable to both taxicab and limousine drivers were:

- Taxi and limo drivers wanted to see some amount of oversight over Uber in order to ensure a more level playing field in terms of cost.
- Taxi and limo drivers also saw the potential for the City to relax certain rules and regulations they must follow. Some suggested the minimum fare be decreased, while others felt continuous driving training was unnecessary and costly.

Taxi Drivers

- All taxi drivers saw Uber as directly affecting their business. Many cited a noticeable and significant decrease in rides since the popularization of Uber in Toronto.
- According to taxi drivers, because Uber is unregulated and thus not required to pay licensing and various other obligatory mandates through the city (driver training, etc.), their prices are more competitive than what they are able to offer.

- Many taxi drivers also noted that Uber drivers are not insured and thus there is an inherent danger to riding in an Uber for both the driver and the passenger.
- Most taxi drivers spoken to wanted to see Uber regulated in a similar way to them – requiring a license, commercial insurance, and following the same obligatory guidelines (driving training, background checks through the City, etc.)

Limousine Drivers

- Limo drivers had similar sentiments about the unregulated nature of Uber, and thus its ability to operate at more competitive prices, limo drivers did not see Uber as a direct competitor.
- While limo drivers also wanted to see a more level playing field, they were more likely to suggest an audit system, where Uber is forced to follow certain regulations but compliance is only periodically audited by the City.

City of Toronto Industry Survey

As a component of the Ground Transportation Review, ML&S conducted two surveys about Ground Transportation, one aimed at the general public and the second aimed at the Toronto taxicab industry. Both surveys were posted from July 27, 2015 to August 16, 2015 on the ML&S website Public Consultation section, www.toronto.ca/mlshaveyoursay.

Approximately 6,300 individuals completed the online industry survey, however, only 17% identified as taxicab and/or limousine industry, while 83% identified as UberX drivers.

To better understand the impacts of Uber on the taxicab industry, the analysis has been undertaken to contrast the responses from those identified as taxicab/limousine industry versus solely UberX drivers.

Full details on this survey can be found at the end of this report.

Summary of Public Consultations

The City contracted with Ipsos Reid to conduct statistically significant and representative qualitative and quantitative research to understand what the public knows and thinks about ground transportation in Toronto, including taxicabs, limousines and Uber.

In addition, the City of Toronto provided an opportunity for the public to participate through an online survey that was posted for 3-weeks during August. This survey resulted in a record number of responses, supported by the advertising of it by Uber.

Ipsos Reid - Summary of Quantitative and Qualitative Engagement

The quantitative phase of research consisted of a representative online survey of 1,004 adult Toronto residents (18+), while the qualitative surveys were comprised of 6 focus groups represented by various segments of the general population. The full report from Ipsos Reid can be found in Attachment 2.

Demographic-based findings

The survey respondents were generally evenly distributed across both gender and age variables, and included people with varying education and employment status. The relative findings as it relates to the demographic distribution of participants were:

- Younger residents are more familiar with Uber, while older residents are more familiar with limos.
- Residents 18-34 are most likely to use public transit, taxis or Uber and to do so more frequently than older residents.
- Older residents are more likely to feel that the same rules and regulations that apply to taxi services should apply to Uber, while 18-34 year olds specifically are more likely to agree that Uber should be allowed to operate even if it doesn't have as much regulation as taxis or that regulations on taxis should be relaxed to allow them to compete with Uber.

Key findings

- One in five Toronto residents (21%) have used an Uber service in the past year and one in ten use either UberX (12%) or UberTaxi (11%) at least once a month. Comparatively, six in ten (58%) have taken a taxi in the past year and three in ten use the service at least once a month (28%).
- Uber is most strongly associated with the convenient experience it offers, and its position as a cheaper option to taxis and sometimes TTC. It is seen as a high tech, fast, accessible offering which provides greater affordability, control and availability to service than its alternatives.

- Taxis/limos and Uber are seen as a fundamentally different service because of the very different experience felt by users.
- Both drivers and passengers shared questions and/or concerns related to the insurance status of Uber, and their providing/using UberX.
- There is a strong sentiment among Toronto residents that people should be able to choose for themselves whether they want to use Uber or taxi services and a majority feel that having both Uber and Taxi services provides Toronto with a competitive marketplace. Few feel that Uber should charge the same as taxis.
- Residents also expect that the City provide rules to protect passengers' personal safety and help ensure safe driving behaviour among providers.

Comments Related to Regulation

- When considering vehicle-for-hire services overall, support is highest for the City to regulate areas that would help ensure passenger safety, mainly criminal background checks for drivers (86% strongly support), safety training for drivers (85%), protection in case of bad/unsafe service (84%), insurance/ liability coverage for passengers (82%) or regularity of driver training (79%).
- Because the service is seen as being fundamentally different, users and non-users alike do not want to see Uber regulated in the same way as taxis and limos.
- There is the perception by users and non-users that taxis/limos are overregulated, and they do not want to see the same thing happen with Uber, since they expect this will drive up the price.
- In addition to the City not over regulating Uber, many wished to see a lessening in regulation on taxis and limos in order to make them more competitive.
- Users and non-users do want to see some minimum guidelines and oversight on Uber, most of which they want in the way of auditing rather than the City owning the information.

[City of Toronto Public Survey](#)

The City survey was available online for 3-weeks in the summer of 2015.

The online survey received 73,000 responses.

The full results of the survey can be found at the end of this report.

Survey results and highlights:

- 33% felt that UberX services should have a regulated fare
- 61% believe that the City should monitor and ensure that proper insurance is in place
- 67% felt that the City should change regulations that would permit Uber to operate

Taxicab Industry in Toronto

Taxicabs play an important - and unique - role in the ground transportation network of any city. Taxicabs complement transit, cycling and walking as a suite of options to move around the city.

Taxicabs are privately run businesses that provide a public service by delivering door-to-door service, in a timely and safe manner, 24 hours a day, 7 days a week. Residents and tourists alike depend on taxicab service to get them where they need to go.

Toronto's taxicabs provide service across the city with an average waiting time of 9 minutes. Without reliable taxicab service, many people would not be able to attend doctor's appointments, bring groceries home or visit friends and relatives.

In Toronto, when a taxicab arrives to pick you up, the driver of the vehicle may have rented that taxicab for a shift, or it may be driven by the vehicle's owner. Both the vehicle and driver are licensed by the City, which ensures a consistent, equitable fare, a minimum vehicle standard and driver training along with appropriate insurance in case of an accident.

History of Taxicab Regulation in Toronto

In 1998, the City undertook significant reforms to the industry, which resulted in the creation of the Ambassador taxicab licence and an industry-wide move towards 'owner-operator principles'.

December 2011 – January 2014, another taxicab industry review was conducted - process engaged more than 4,500 stakeholders, through 40+ consultations, 100 stakeholder meetings and three issue-based surveys which collectively had over 3,000 responses. Changes resulting from this review including the creation of a new licence, the Toronto Taxicab Licence, which is owner-operated and wheelchair accessible. Council also directed at that time that all existing taxicabs would transition to the TTL.

This bylaw was challenged in court by members of the taxicab industry. In January 2015, the Court upheld the new bylaw with the exception of a mandatory conversion of all existing taxicabs to the new TTL by June 30, 2024 which was passed by a motion on the Council floor. Inadequate notice and lack of opportunity for the industry to comment was the rationale for quashing the deadline.

Key Facts about the Taxicab Industry

- 5,000 licensed taxicabs operating in Toronto, of which 10% are wheelchair accessible. Surpassing the 2014 City Council endorsed goal of 6%.
- Estimated that more than 65,000 trips are taken in taxicabs every day. At an average fare of \$25 per trip, it can be estimated that \$1.6 million is generated through fare revenue each day
- Average of time to receive a taxicab is 9 minutes – anywhere in the City.
- Taxicab Industry consists of:
 - 10,000 Taxicab Drivers
 - 3,451 Standard Plate Taxicab Owners
 - 1,300 Ambassador Plate Taxicab Owners
 - 425 Toronto Taxicab Licence Owners
 - 29 Taxicab Brokers

Main Elements of Regulation

February 2014, City Council made several changes to improve Toronto's taxicab industry, many of which went beyond staff recommendations. Changes included:

- Creation of a new licence - the Toronto Taxicab Licence (TTL) which is owner-operated, transferable and accessible
- Direction to issue 290 new taxicab licences to ensure accessible taxicabs for the Pan Am Parapan Am Games
- Ambassador taxicabs permitted transferability (ability to sell taxicab)
- Vehicles:
 - All taxicabs that are not wheelchair accessible must be either: hybrid, low-emission or alternative fuel vehicles
 - Hybrid, low emission, alternative fuel and accessible taxicab vehicles can be 7 model years old.

Other regulations include:

- Inspections:
 - taxicabs are inspected twice a year at the inspection center.
- Insurance:
 - \$2 million commercial insurance, all drivers must be listed on policy.
- Rates and operation:
 - Taxicab fare is based on an initial cost (called the 'drop') plus distance and time. Average fare is 10kms long and costs \$25

Potential Changes to Taxicab Regulation

As part of the recommended review of taxicab regulations, the following table identifies issues that will be considered as part of this process.

Training	<ul style="list-style-type: none"> ➤ Review taxicab training requirements ➤ Review applicability of refresher training ➤ Review owner-specific training when taxicab is not owner-operated ➤ Review necessity of CPR requirement
Administrative Burden	<ul style="list-style-type: none"> ➤ Review owner responsibilities ➤ Eliminate the annual filing requirements for drivers to remain on the Drivers' Waiting List. ➤ Eliminate the application process and fee for advertising approval on taxicabs ➤ Reduce mandatory record collection and change to audit compliance upon renewals or requests.
Vehicle Inspection	<ul style="list-style-type: none"> ➤ Review vehicle inspections process ➤ Consider reducing daily inspections and eliminate the requirement to return taxicab to owner after every shift
Exclusive Concession Agreements	<ul style="list-style-type: none"> ➤ Possibly allow opportunity to enter into agreements to increase employment opportunities
Vehicle Types	<ul style="list-style-type: none"> ➤ Consider vehicle types and model year requirements
Modernization and elimination of redundant language and processes	<ul style="list-style-type: none"> ➤ Eliminate requirement to submit three photographs ➤ Remove manufacturer standard requirements from bylaw (stop lamps, spare tires and child safety locks, etc.). ➤ Remove conflicting legislation
Rates and Fares	<ul style="list-style-type: none"> ➤ Allow pick-up of multiple passengers ➤ Review tariff – potential to reduce or make flexible ➤ Review taxicab meters

Staff would engage the industry on these elements of the approach and bring back a report with specific recommendations to the Licensing and Standards Committee.

This approach would help reduce regulation and licensing costs that could be beneficial to the taxicab industry.

Outstanding Report Requests on Taxicab Regulations

There are currently 23 outstanding taxicab regulation directives from Committees and Council related to the Taxicab regulations, as follows:

1.	2013.LS19.8	Taxicab Safety Issues - Request for Report	The Licensing and Standards Committee requested the Executive Director, Municipal Licensing and Standards, in consultation with the City Solicitor, to report to a future Licensing and Standards Committee meeting on: 1. the process, guidelines and criteria that staff use to report to the Toronto Licensing Tribunal and any changes that will improve consumer protection; the health, safety and well-being of passengers and the general public; and the economic, social and environmental well-being of the City. 2. a review of Toronto Municipal Code, Chapter 545, Licensing, Appendix K, Business Licence Thresholds, and any changes that will improve consumer protection; the health, safety and well-being of passengers and the general public; and the economic, social and environmental well-being of the City. 3. the screening requirements, protocols, or guidelines in place to ensure the health and safety of the riding public; include a review of the requirement for more frequent (such as 2 years) Police background checks when Taxi Cab Drivers renew their licence. 4. the roles and responsibilities of City Council, The Licensing Tribunal and City Staff in reviewing applications for licences or licence holders where criminal convictions are involved
2.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council request the Executive Director, Municipal Licensing and Standards to report back to the Licensing and Standards Committee in one year on the rate of transition to the Toronto Taxi Licence.

3.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council direct the Executive Director, Municipal Licensing and Standards, in consultation with the City's Disability Issues Committee, to undertake a review in two years on the success of the accessible cab initiative and to bring further recommendations to Council, if necessary, to ensure that the City achieves its goal of service equivalency regarding the disabled community.
4.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council direct the Executive Director, Municipal Licensing and Standards to conduct further consultation, and report back to the Licensing and Standards Committee by June 1, 2015, on the appropriate regulatory regime and necessary bylaw amendments to facilitate common management of taxicabs, eliminate the role of designated agents and create a new licence category called "Fleet Operator", such report to also include recommendations to: a. address concerns about unscrupulous or exploitative business practices, shift fees and lease rates and provide greater transparency, accountability and fairness in agreements and contracts with shift drivers and lessees; and b. provide City authority to collect and audit any documentation related to the operation of a taxicab or fleet.
5.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council request the Executive Director, Municipal Licensing and Standards to report to the Licensing and Standards Committee on the possibility of exempting the Ambassador taxicab owners from their minimum driving requirements as a result of illness, extended leave or an unforeseen family emergency.
6.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council direct the Executive Director, Municipal Licensing and Standards to undertake a review of flat rate wheelchair accessible transportation providers and report back to the Licensing and Standards

			Committee.
7.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council direct the Executive Director, Municipal Licensing and Standards to conduct a passenger survey in 2014 to understand the impacts and public opinion of mandating taxicab shields in Toronto taxicabs, and to report back to the Licensing and Standards Committee.
8.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council direct the Executive Director, Municipal Licensing and Standards to undertake an evaluation and a pilot program, if feasible, of using fire hydrants as cabstands in the downtown core, such evaluation to include the impact on the new rush hour regulations on main streets.
9.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council direct the Executive Director, Municipal Licensing and Standards to undertake an evaluation and a pilot program, if feasible, of implementing Hail Spots.
10.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council direct the Executive Director, Municipal Licensing and Standards to create a working group to review taxicab vehicle regulations, focused on ensuring taxicab regulations enable inclusive use, including wheelchair accessibility, and the feasibility of mandating accessible vehicles for all of Toronto's taxicabs in the future and further direct the Executive Director, Municipal Licensing and Standards to submit the findings of the working group to the Licensing and Standards Committee in two years time.
11.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council request the Executive Director, Municipal Licensing and Standards to report back to the Licensing and Standards Committee in one year on the status of vehicle manufacturers' ability to provide accessible taxis.

12.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council request the Executive Director, Municipal Licensing and Standards to report back to City Council in the first quarter of 2015 regarding a procurement process for a standardized made-in-Ontario Toronto Taxi Vehicle to be required for all vehicles operated with a Toronto Taxicab Licence, a requirement similar to those in New York City and London which require a single, standardized, accessible vehicle for all licences. and further, that the procurement process should help meet the following City objectives: a. provide a level playing field and a universally accessible vehicle; b. promote the use of fuel-efficient vehicles in Toronto's taxi fleet; and c. working with the Federal and Provincial governments, support a made-in-Ontario approach to manufacturing and support the local economy.
13.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council direct the Executive Director, Municipal Licensing and Standards to undertake further consultation with Taxicab Brokers on mandating of brokerages to keep additional records of the date and time of pick-up for each taxicab trip and the submission of such records to the City.
14.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council direct the Executive Director, Municipal Licensing and Standards to undertake further consultation with Taxi Brokers on mandating of brokerages to keep additional records of the date and time of each wheelchair accessible taxicab dispatch and pick-up and submission of records to the City.
15.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council direct the Executive Director, Municipal Licensing and Standards to create a working group and report back to the Licensing and Standards Committee on technical specifications and the implementation of mandated passenger information monitors, to empower passengers and support accessibility, by

			January 1, 2016.
16.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council direct the Executive Director, Municipal Licensing and Standards to create a working group and report back to the Licensing and Standards Committee on technical specifications and the implementation of mandated vehicle information technology, capable of generating operator logs unique to each vehicle and operator, by January 1, 2015.
17.	2014.LS26.1	The Taxicab Industry Review - Final Report	City Council direct the Executive Director, Municipal Licensing and Standards to create a working group and report back to the Licensing and Standards Committee on mandating all taxicabs to be equipped to accept debit and credit card payment using approved electronic payment technology, by January 1, 2015.
18.	2014.MM55.26	Escalating Insurance Rates and Challenges to Obtaining Insurance for Accessible Taxicabs in Toronto	City Council request the Executive Director, Municipal Licensing and Standards to investigate and to report back to the Licensing and Standards Committee in the first-quarter of 2015 on escalating insurance rates and challenges to obtaining insurance for accessible taxicabs in the City of Toronto.
19.	2015.LS1.6	Transfer of Ambassador Licence to an Estate	Requested the Executive Director, Municipal Licensing and Standards to report to the March 24, 2015 meeting of the Committee on the rationale for choosing July 1, 2014 as the effective date for an Ambassador License being able to be transferred to an estate.
20.	2015.LS2.1	Information Regarding Municipal Code, Chapter 545, Licensing, Article VIII, Owners and Drivers of Taxicabs	Directed the Executive Director of Municipal Licensing and Standards to undertake a review, ensure notice is provided, and report back to the April 21, 2015 meeting of the Licensing and Standards Committee on potential amendments to reinstate Ambassador licences, where the licence was cancelled on or after June 27, 2013 (the date the

			Committee received the report "Taxi Review Framework for Change") as a result of the licence holder's death, or on other compassionate grounds, to allow the transfer of the licence in accordance with the bylaw amendments adopted by City Council in February, 2014.
21.	2015.LS2.1	Information Regarding Municipal Code, Chapter 545, Licensing, Article VIII, Owners and Drivers of Taxicabs	Directed the Executive Director of Municipal Licensing and Standards to report to the Licensing and Standards Committee on October 19, 2015 on the feasibility of immediately grandfathering any standard plates, including leases, that existed since the pre-1998 taxi reforms.
22.	2015.LS2.1	Information Regarding Municipal Code, Chapter 545, Licensing, Article VIII, Owners and Drivers of Taxicabs	Directed the Executive Director of Municipal Licensing and Standards to report back to the Licensing and Standards Committee meeting in the fall of 2016 on the status of the provision of metered, on-demand wheelchair accessible taxicab service.
23.	2015.DI2.4	Accessible Taxis in Toronto	City Council request the Executive Director, Municipal Licensing and Standards to research the possibility of mandating side-entry accessible vehicles to further enhance safety for Toronto's taxicabs as part of the report on accessible taxicabs expected in 2016.

Accessible Taxicab Service

In 2014, City Council directed that staff undertake work to ensure that 6% of Toronto's taxicabs were wheelchair accessible in time for the Pan Am and Para Pan Am games.

The City surpassed that goal, with 10% of Toronto taxicabs being accessible and available to residents and visitors.

To help achieve this goal, 290 wheelchair accessible taxicab licences were issued to taxicab drivers, who purchased accessible vehicles, undertook training and became accessible taxicab owners.

In April 2015, the City's Disability, Access and Inclusion Advisory Committee advised ML&S staff that despite this increase in accessible taxicabs, the level of service to persons requiring wheelchair accessible service was poor. The committee indicated that other flat rate providers were not as available as they had been previously, and that the current supply of taxicabs were not meeting their needs.

While this report and a previous directive requests a report back on the current status of accessible metered on-demand taxicab service, staff will be recommending an incremental issuance of plates to continue towards service equivalency, and to address the concerns raised by the committee as indicated above.

Limousine Industry in Toronto

Limousines provide ground transportation services on a flat rate and pre-booked basis. Many people rely on limousines to take them to the airport or for special occasions. Tourists may opt to take a limousine as their main way to move around the city.

History of Limousine Regulation in Toronto

Before 1985, limousine licences – called 'livery owner's licences' at the time, were issued upon request, without limit. April 1985, Metro Toronto Council imposed cap of 375 livery owner licences.

In 2005, the City conducted a review on the limousine industry. This review focussed on distinguishing the taxicab and limousine industries and created 'Limousine Service Companies'. The purpose of the limousine service company is to pre-arrange fares, ensure vehicles are inspected and insured and maintain records. The 2005 review also:

- removed the limit on the number of licences
- required all owners to register with a limousine service company
- imposed 1:6 ratio on limousine service companies (1 stretch limousine for every 6 sedans)
- mandated inspections twice a year

In 2007, there was a challenge to the bylaw which resulted in additional changes, including a training component for limousine drivers. There is an outstanding request from this time for staff to review how stretch to sedan ratios are working.

In 2013, city staff undertook consultations with the limousine industry. A report with recommendations was not submitted to committee, pending the outcome on the taxicab industry review.

The 2013 review included:

- 2 public consultations (zero attendance)
- 3 consultations with industry (50 participants)
- 611 surveys completed by the public (mostly completed by UberBlack users)
- 177 surveys completed by the limo industry

Main issues arising from the 2013 industry consultations were:

- Age of vehicles is too short
- Vehicle ratio does not make sense since stretch limos are not used
- Staging prohibitions are antiquated
- Flat rate fees are too high
- Training is too onerous
- Uber – some in favour, some not in favour
- Enforcement of unregulated drivers (including Uber)

Key Facts about the Limousine Industry

- Limousine Industry consists of:
 - 93 limousine service companies
 - 931 limousine owners
 - 1,394 limousine drivers
- Limousines cannot pick up streethails and must be pre-booked by 20 minutes
- Limousines must charge a minimum of \$70/hour for a minimum of two hours
- Limousines must be a luxury vehicle, approved by the City of Toronto

Main elements of Regulation

- Current limousine bylaw was last reviewed in 2007
- Limousine drivers must complete 5-day training course + one-day CPR; and refresher training every four years
- Sedan limousines cannot be older than 5 model years

- Stretch limousines cannot be older than 8 model years
- limousines are inspected twice a year at the inspection centre
- \$2 million commercial insurance, all drivers must be listed on policy.
- Rates and operation:
 - Minimum of \$70/hour for the first two hours.
 - Must be pre-arranged by 20 minutes
 - Limousines are not permitted to park within 200 meters of hotel, theatre or entertainment facility unless they have a pre-arranged pick-up
- Fleet ratios:
 - to be a limo service company, owner must have at least one stretch and two sedans registered, and then permitted an additional 2 sedans. After which, a service company can register 6 additional sedans for each additional stretch (1:6 ratio)

Limousine Industry Review

Traditionally, the limousine industry has been regulated in a way that separates its market from that of the taxicab industry. This has resulted in regulations that ensure limousines must be pre-booked by 20 minutes and they must charge a minimum fare of \$70/hour for a minimum time of 2 hours.

Staff would engage the industry on these elements and bring back a report with specific recommendations to the Licensing and Standards Committee.

The limousine industry review would consider changes, including:

1. restructuring the minimum fare
2. eliminating pre-booking minimum time
3. requirements for Limousine Service Companies to have stretch limousines

Alternatives to Licensing Requirements for Brokers and Limousine Service Companies

As part of this report, staff have considered a number of alternatives to a licensing requirement, including a registry-based system and a freestanding bylaw, discussed below, that can be used to control the operations of certain businesses. Staff have concluded that the mechanism that best achieves the City's policy goals is that of requiring a business licence, as it allows for central control over a licensee's entire business, maintains maximum control by the City over its administrative process, facilitates enforcement, and acts as a signal to the public of regulation.

The public policy objectives that motivate the substantive requirements placed on taxicab brokerage and limousine service company licence holders are set out below. They support accountability among industry participants and to customers; help ensure consumer protection and the health, safety, and well-being of residents; and foster a stable transportation network.

Requirement to obtain a licence

The requirement to obtain a licence is a common mechanism by which many municipalities, including the City, have traditionally exercised control over individual and corporations carrying on business in their jurisdictions. The power of the City to license businesses is set out in the City of Toronto Act, 2006. Currently, the City requires licenses of 50+ categories of business and this is the primary method used to regulate their conduct to achieve the City's policy goals.

With respect to the requirement to obtain a licence generally, staff believe it is necessary, as it permits the City a level of oversight over licensees that cannot be achieved by other methods.

First, a licensing bylaw can prescribe requirements that must be satisfied prior to a licence being issued by the City. In the case of a taxicab brokerage or limousine service company, Municipal Licensing and Standards currently requires information with respect to the applicant's corporate structure and ownership, as well as the criminal backgrounds of individual directors. The Executive Director of Municipal Licensing and Standards may require any further information that she deems necessary. Once the information is supplied, an informed decision can be made that protects the public interest. The licence requirement therefore serves a gatekeeping function that prevents businesses that may pose a risk to public safety or consumers from operating.

Second, if a licensee is found to have violated municipal bylaws, or the laws of another level of government, including the Criminal Code, the City may refuse to renew a business licence or may seek to have the licence revoked or to have conditions placed upon it. These steps can be taken administratively, without the need to resort to court proceedings that can be protracted or focused on individual violations of a bylaw, which allows for the immediate protection of public health, safety, and well-being, and the protection of consumers. The licence requirement offers a single, City-controlled mechanism to suspend the legal operation of a non-compliant business.

Third, the licence requirement provides some assurance to the public that if the business is licensed, it has been subject to background screening and oversight by the City, which may influence a consumer's decision to use the services of that business. A licence requirement may also encourage members of the public to complain to the City about practices of a licenced business that they view as unfair, illegal, or exploitative, as a licence signals a level of oversight.

Finally, a licence requirement greatly facilitates the enforcement of all City bylaws, including Chapter 545, as it:

- Creates a record for all licensees, including their legal name, address for service, past licensing history, and any conditions that have been placed on the licence; and
- Enables enforcement officers to quickly ascertain whether a business operating in Toronto requires a licence and whether to lay a charge for failing to obtain one.

Registry-based system

One alternative to a licence requirement would be a registry-based system, whereby a business provides required information on paper or online and registers as operating in Toronto, thereby permitting the business to operate, subject to the same regulations as the licence-based model.

The primary disadvantage of a registry-based system is that Municipal Licensing and Standards would be unable to exercise the same level of oversight over the initial application as with a licence-based model. The Executive Director would lack equivalent power to request further and better documentation from an applicant prior to granting registration. A registry model may also deprive the City of a method of cross-referencing and verifying information prior to registration.

Even if a registry system were put in place that permitted an equivalent level of oversight as the licensing model, it is difficult to understand how such a system would be less impairing of the right to freedom of expression, if any infringement exists. A registry system carries essentially the same burden as a licence application, including the submission of information, the payment of a fee for the City to attain cost recovery, and the same substantive requirements of a licence holder in order for the City to meet its public policy goals, which are outlined above.

No licence requirement

The only other alternative to a licence requirement or registry system is to impose substantive requirements directly by way of a standalone bylaw and not require a licence. However, this option does not achieve the important public policy goals outlined above with respect to public safety, health, and well-being and consumer protection that are facilitated by a licence provision.

First, a standalone bylaw deprives the City of information as to who is operating a given business in Toronto, the business' corporate structure and ownership, and the business' registered address, among other information. This significantly complicates the enforcement of a complex bylaw by creating problems with locating and inspecting a business, naming the correct defendant, corporate accountability, and the service of legal documents.

Second, a standalone bylaw lacks a central mechanism that can be used to control an entire business operation. In order to successfully stop a business from operating, the City would be required to lay individual charges under the bylaw and request, as an extraordinary remedy, that a court order the business closed as a result of repeated breaches. The lack of ability of the City to revoke a licence also removes an element of administrative control over the process by which a licence may be revoked or have conditions placed on it and the threshold for doing so.

Finally, the lack of a licence requirement may lower the public's awareness of the City's regulation of the business in question, which may result in uncertainty on the part of consumers or a perception that complaints about business practices cannot be referred to the City for action.

Overview of Uber

Uber operates in 59 countries, some legally and some illegally. They report to have 1 million drivers worldwide.

Uber connects passengers with vehicles-for-hire through a computer system that utilizes smartphone technology. When a person signs up with Uber, they provide credit card and/or debit card information and sign a 'terms of use' agreement. The user must download the application onto their smartphone and then they are able to begin using the service.

Key facts about Uber

- 2012 Uber began operating in Toronto
- 2014 launched UberX in Toronto, currently 85% of their business
- Both driver and passenger rate each other after each ride – low rating means you are not permitted to participate
- Uber conducts background checks and requires safety inspections on vehicles
- Uber charges drivers as a percentage of each trip fare

History of Uber in Toronto

In 2012, Uber began operating in Toronto by dispatching black cars (UberBLACK) and taxicabs (UberTAXI) to passengers. They did so without the requisite brokerage/service company licences.

September 2014, Uber launched new service called UberX in Toronto.

May 2015, Uber applied for a Taxicab Brokers licence, which is a regulatory requirement to dispatch licensed taxicabs, but failed to complete the application.

July 2015, Uber launched UberPool on a two week pilot during the Pan Am Games.

Uber Services in Toronto

Uber dispatches two type of vehicles: municipally licensed vehicles (taxicabs and limousines) and unlicensed private vehicles. A passenger can receive an Uber vehicle on average between 2 – 4 minutes after requesting the ride.

Uber has several different services that are available on their application platform – each service currently has different levels of regulatory oversight: UberTaxi, UberAccess, UberBlack, UberX, Uber XL, UberSelect.

85% of Uber trips – an estimated 17,000 trips per day- are delivered through the UberX platform in Toronto.

UberTaxi

- Dispatches 1,300 licensed taxicabs
- Charges the meter fare
- Operates in a manner consistent with Toronto's taxicab bylaw.

UberAccess

- Dispatches 50 licensed taxicabs that are accessible (Toronto Taxicab Licences – TTLs)
- Charges the meter fare
- Operates in a manner consistent with Toronto's taxicab bylaw.

UberBlack

- Dispatches 500 licensed limousines
- Charges a rate based on distance and time (not currently permitted)
- Allows customers to order limousines on-demand and for short periods of time (not currently permitted).

UberX, UberXL, UberSUV, UberSelect

- Dispatches 13,000 unlicensed private vehicles-for-hire
- Rate charged is variable
- Drivers do not hold a city-issued licence
- Vehicles are not equipped with the same security provisions as licensed taxicabs and have not been inspected by City
- Insurance coverage is unknown
- Currently no regulatory oversight

UberPool

- The launch of UberPool occurred in Toronto during the Pan Am Games on a pilot basis – it does not currently operate in Toronto, although Uber has stated that the intention is to launch this service in Toronto

- UberPool permits UberX rides to be shared between two or three passengers who do not know each other and are travelling the same direction
- The UberX fare is split between the passengers automatically through the smartphone application.
- This service is not carpooling; more like 'taxicab sharing' or 'jitney' service.
- UberPool does not conform with existing bylaws and currently would have not regulatory oversight if implemented on a permanent basis

Superior Court Application

In November 2014, in response to Uber's continued operation and significant concerns for the safety of the public, the Executive Director of Municipal Licensing & Standards (ML&S) via delegated authority, filed a court application seeking an injunction. On July 3, 2015, the court ruled that Uber's operations were not captured by the current definitions of taxicab broker and limousine service company in the Municipal Code.

Enforcement Efforts

Enforcement began in 2012 when Uber commenced operating. The disposition of these 36 matters were held in abeyance pending the outcome of the Superior Court application.

From September 2014 to March 2015, ML&S began investigations related to UberX drivers. Further investigations were suspended pending the Superior Court application that was to be heard in May.

In July, 2015, ML&S commenced investigations subsequent to receiving the Superior Court decision of July 3, 2015. Investigations are focused on all unlicensed drivers, including UberX drivers who are providing private ground transportation services without the requisite licence.

July, 2015, City Council requested via motion that enforcement related to unlicensed drivers providing ground transportation services be undertaken by both ML&S and the Toronto Police Service.

As of September 3, 2015, ML&S has laid 104 charges against 208 UberX drivers.

Chart comparing City of Toronto licensed vehicles with Uber services

This chart compares the operation and regulations of regulated taxicabs and limousines to that of Uber services.

	Taxicab	Limousine	Uber TAXI	Uber BLACK	Uber X	Uber Select
Type of Vehicle	Taxicab	Limousine	Taxicab	Limousine	Private vehicle	Private vehicle
Fare	\$4.25 base fare + kms+ time	\$70 minimum fare per hour for a minimum of two hours	\$4.25 base fare + kms+ time Same fare as set by City of Toronto for taxicabs	\$8 base fare + kms + time Subject to surge pricing	\$2.50 base fare + kms + time + safe rides fee Approximately 30-40% less than taxicab fare Subject to surge pricing	\$5 base fare + kms +time + safe rides fee Approx. more than a taxi but less than UberBlack Subject to surge pricing
Vehicle	City of Toronto approved taxicab vehicle -Low-emission -Hybrid -Accessible	City of Toronto approved limousine Luxury vehicle	City of Toronto approved taxicab vehicle -Low-emission -Hybrid -Accessible	City of Toronto approved limousine Luxury vehicle	Unknown	Unknown
Age of Vehicle	7 model years	5 model years	7 model years	5 model years	10 model years	Unknown
Licence	Taxicabs and drivers licensed by City	Limousines and drivers licensed by City	Taxicabs and drivers licensed by City	Limousines and drivers licensed by City	Neither vehicle nor driver are licensed	Neither vehicle nor driver are licensed
Insurance	Commercial - \$2 Million	Commercial - \$2 Million	Commercial - \$2 Million	Commercial - \$2 Million	Unknown	Unknown

Compliance with City bylaws	Complies	Complies	Dispatch does not comply	Dispatch does not comply	Neither vehicle nor dispatch complies	Neither vehicle nor dispatch complies
			Vehicle complies	Fares do not comply		
				Vehicle Complies		

UberPool and its Potential Impacts on the TTC

UberPool is different than carpooling. Carpooling is defined in the Public Vehicles Act as a round-trip between residences, where the taking of passengers is incidental to the driver's purpose for the trip. A person who is carpooling cannot charge or pay a fee that is above cost recovery. Also, the driver cannot take passengers on more than one one-way or round trip in a day.

UberPool is most like 'taxi-sharing' or 'jitney' service that allows passengers who don't know each other to split the cost of taking a taxi. Advancements in technology have enhanced the capacity for 'jitney' service to work effectively, since the technology can connect drivers with several passengers that are going to same way and automatically split the fare in a transparent way.

City Council on July 7, 8 and 9, 2015, directed city staff to report to the September 30 and October 1, 2015 meeting of City Council on an analysis of the effect of the use of Uber's car-pooling app, known as UberPool, would have on ridership of the Toronto Transit Commission (TTC).

In response to this request, the TTC informed ML&S staff that the operation of UberPool and other services like it, are not expected to have any significant impact on the TTC's operation, based on the scale of TTC's operation and that UberPool operates at higher fares than the TTC and caters to a small market segment.

TTC fully supports all modes of transportation which reduce the use of the single driver private automobile, which includes carpooling. Carpooling and other alternatives to the single driver automobile will reduce the impact of Toronto's transportation system on the environment and greenhouse gasses.

Jurisdictional Scan on Uber's Operations

The following chart provides a jurisdictional overview of where UberX is regulated through Transportation Network Company regulations and where UberX is not permitted and its legal status.

North American Jurisdictions where TNC regulation in place or proposed

City	UberX Status	Details
Austin	Regulated and operating legally	Ordinance regulating TNCs passed and approved on October 16, 2014. This is a pilot regulatory framework.
Boston	Uber is operating legally under state-wide operating agreement.	The City is awaiting state regulation on TNCs. The ordinances currently under consideration might preempt additional local control over TNCs.
Charleston	Regulated and operating legally	<p>April 28, 2015, Council approved an ordinance that went into effect on June 28th, 2015. The ordinance requires TNC drivers to obtain a business licence and allows taxis to raise their rates.</p> <p>Shortly after the City passed its ordinance regulating TNCs, the state of South Carolina passed its law regulating TNCs that preempts the City's ordinance. While the regulations are almost the same, the City, for public safety and monitoring purposes sought to monitor the TNCs while the state law authorizes the TNCs to regulate themselves.</p>
Chicago	Regulated and operating legally	Ordinance regulating Transportation Network Providers (TNPs) came into effect September 2, 2014.
Houston	Regulated and operating legally	Ordinance that includes TNC under vehicle-for-hire licensing regime passed and approved in August 2014.
New York City	Operating under existing licensing regime	<p>Uber and Lyft operate as "base" owners (like brokerages) and drivers are licensed as for-hire vehicles.</p> <p>NYC Council was considering capping e-hail cars, but has decided to study e-hail impact on traffic before</p>

		voting on the matter.
Portland	Uber is operating legally under Temporary Operating Agreement with the City.	Implemented a 120-day Private For-Hire Transportation Innovation Pilot Program that began in April. Program was extended and will conclude in October. Staff updated Council in August with updates and direction building on pilot program rules for TNCs.
San Antonio	Regulated and not operating	Uber has stopped operating in San Antonio, arguing that the TNC requirements are too burdensome. December 11, 2014, the City passed an ordinance that includes TNC under vehicle for hire licensing regime. March 2015, City Council voted to ease regulations.
San Diego	Legal and regulated at the state level	November 10, 2014, Council passed a bill that removed cap on number of taxicab permits issued in the City.

US States that have enacted TNC regulation

State	UberX Status	Details
California	Regulated and operating legally	September 2013, California Public Utilities Commission passed its TNC regulation. The State of California fined Uber \$7.3 million in July 2015 for failure to comply with the mandatory reporting requirements in the TNC regulation.
Colorado	Regulated and operating legally	State-wide regulations of TNCs enacted in June 2014.
Illinois	Regulated and operating legally	The state-wide "Transportation Network Providers Act," regulating TNCs, came into effect July 1, 2015.
Massachusetts	Uber operating legally under Temporary	An "Act Establishing Department of Public Utilities (DPU) Oversight of Transportation Network Companies" establishes state-wide regulations on

	Operating Agreement with the state.	TNCs under review and currently referred to the Committee on Financial Services.
North Carolina	Regulated and operating legally	July 1, 2015, state Senate adopted Act to Regulate Transportation Network Companies. Overrides all other regulatory efforts regarding TNCs in the state.
Pennsylvania	Uber operating legally under Temporary Operating Agreement with the state	April 24, 2015, bill proposing regulations for TNCs was referred to Consumer Affairs. Pennsylvania Public Utility Commission granted Uber a two year, experimental permit to operate. This excludes Philadelphia, as Philadelphia Parking Authority has jurisdiction over the City. UberX is operating illegally in Philadelphia.
Seattle	Regulated and operating legally	Seattle City Council approved legislation that provides licensing regime for TNCs, effective July 15, 2014.
South Carolina	Regulated and operating legally	The Public Service Commission issued a cease-and-desist order on January 15, 2015 and granted a temporary licence that expired on June 30, 2015. A bill regulating Transportation Network Companies was approved on June 23, 2015. TNCs have 60 days to obtain the necessary permit from the Office of Regulatory Staff.
Washington D.C.	Regulated and operating legally	District Council passed the "Transportation Network Services Innovation Act of 2014" amending the <i>Taxicab Commission Establishment Act of 1985</i> on December 5, 2014.
New York	Not currently in state jurisdiction	Proposed "Act to amend insurance law, the vehicle and traffic law, the general municipal law and the transportation law, in relation to transportation network companies" is being considered by State Assembly.
Texas	Not currently in state jurisdiction	Proposed bill relating to the regulation of transportation network companies; imposing and authorizing fees; requiring an occupational permit

		is being considered by the state.
Virginia	Regulated and operating legally	State-wide law regulating TNCs came into effect July 1 st , 2015.
Washington State	Regulated and operating legally	State-wide bill regulating TNC, effective July 24, 2015.

North American Jurisdictions – No TNC Regulation, Uber in Operation

State or City	UberX Status	Details
Philadelphia	Unregulated and operating illegally	State-level Pennsylvania Temporary Operating Agreement regulation does not include Philadelphia. Philadelphia Parking Authority has jurisdiction over transportation companies.

International Jurisdictions

Jurisdiction	UberX Status	Details
Belgium	Banned	April 2014, Uber was deemed illegal in a court ruling. On May 4, 2015, an Uber driver was found guilty of breaking taxi laws.
Brussels, Belgium	Banned at national level	Mobility Minister put forward a plan to modernize the taxi legislation to include emerging competitors.
France	UberX is banned	Uber has suspended UberX (known as Uberpop) service after two Uber executives were indicted in France. Uberpop had continued to operate in contravention to the law, inciting violence and protests. Loi Thévenoud was passed in 2014 and limits Uber's operations, with rules that mimic taxi services.

		<p>European Commission is probing France's law banning Uber services.</p> <p>French government is developing an electronic taxi availability register.</p>
Germany	Banned	<p>March 18, 2014, German court decided to ban UberX (known as Uberpop) for unlicensed taxi service.</p> <p>European Commission is probing Germany's ban on Uber services.</p>
Netherlands	Banned	<p>Trade and Industry Appeals Tribunal banned UberX (known as Uberpop) in December 2014.</p> <p>Dutch prosecutors have launched a criminal investigation into Uber for providing an illegal taxi service in violation of the court order.</p>
New South Wales (NSW), Australia	Unregulated and operating illegally	<p>July 1, 2015, Minister for Transport and Infrastructure announced an independent taskforce to examine the future sustainability of taxis, hire cars and other emerging point to point transport providers in NSW including ridesharing apps. The taskforce will consider the possible impact of any changes to regulation on existing investors and will recommend changes where necessary. The taskforce will also look at the transportation services available for people with disabilities and other groups who rely on community transportation daily.</p>
Queensland, Australia	Unregulated and operating illegally	<p>Forthcoming review of the taxi strategy that will consider a range of options including co-existence of taxis and TNCs.</p>
Scotland	Uber not yet in operation	<p>Uber was granted Booking Office Licenses for Glasgow and Edinburgh, though they have not begun to operate there. Drivers and vehicles would be required to obtain licences from local authorities. Government staff have convened a working group to evaluate the impact of changing technology and</p>

		consider the adequacy of existing legislation.
Spain	Banned	On Dec. 9, 2014, a Madrid judge ordered Uber to cease all operations in Spain. The judge has referred the issue of whether Uber is a "mere transport service" or a digital service to the European Court of Justice (ECJ), according to Uber.
Victoria, Australia	Unregulated and operating illegally	
Western Australia	Unregulated and operating illegally	July 24, 2015, Green paper discussing on-demand transport was published. The paper will go to state Cabinet for approval. The paper proposes licence framework that is less prescriptive and allows for greater flexibility for different business models. The paper calls for public input/submissions.

Overview of Lyft

Lyft started in 2012 and is based out of San Francisco. Lyft currently operates in over 60 cities throughout the United States and reportedly dispatches over 2 million rides a month in the US. Lyft does not currently operate in any international markets. They are only operating in jurisdictions where some type of Transportation Network Company regulation has been adopted.

Key facts about Lyft

- Lyft does not currently operate in Toronto.
- 2012, Lyft began dispatching unlicensed, private vehicles-for-hire (a similar service to UberX) through application based software.
- 2014, Lyft Line introduced (where passengers going the same way, but who do not know each other can share trips and split the fare automatically)
- Lyft does not broker or engage in the provision of taxicab or limousine services by municipally licensed vehicles
- The technology and operating model of Lyft is the same as that of Uber, in respect to driver onboarding including criminal background and driver screening, verification of records, vehicle standards, etc
- Lyft charges drivers as a percentage of each trip fare

Lyft Services

Lyft does not dispatch taxicabs or limousines. Lyft connects passengers with unlicensed, private vehicle-for-hire at a rate typically less than a taxicab. The rates are not set, and can surge based on demand. Lyft operates two main services: Lyft and Lyft Line.

Lyft

- Dispatches unlicensed private vehicles-for-hire to passengers via a smartphone app
- Rate charged is variable (mostly costs less than taxicab fare, but can surge based on demand)
- Drivers do not hold a city-issued licence
- Meets TNC regulations in relevant US states
- Insurance coverage aligns with US regulations

Lyft Line

- In 2014, launched Lyft Line which enables multiple parties traveling separately to be matched with a common driver (similar to UberPool)
- Capability to enter your destination as a driver and be matched with passengers going to same way (closer to definition of carpooling)

Transportation Network Company Regulation

Where Uber, and other companies like them, have been regulated in the United States, these companies are referred to as Transportation Network Companies or "TNCs". This is because these companies connect drivers with personal vehicles to passengers through a "peer-to-peer" basis. This means that a computer system connects the screened and approved driver with the passenger who has signed up for the service.

Currently the two biggest companies that perform this type of service are Uber and Lyft. Lyft does not currently operate in Toronto, although they may consider offering their services here as well, should the conditions of the market meet their expansion principles.

Transportation Network Companies dispatch personal vehicles that are not licensed by the City to transport passengers. Currently this service is not regulated by Toronto, which means there is currently no regulatory oversight on these businesses.

During the 2015 Ground Transportation Review, staff met with executives of Uber and Lyft to gain insights into the operations and potential for regulatory oversight. On

August 17, 2015, ML&S staff met with representatives from Uber and on August 19, 2015, City staff participated in a WebEx conference call with a representative from Lyft.

Typical Transportation Network Company Regulations

Below are typical components of TNC regulations. Details vary based on jurisdiction.

Requirement	Details
Business Licence	TNCs to obtain permit or licence and pay applicable fee.
Fare	<p>TNC fares are not regulated, though method of calculation to be disclosed to governing body.</p> <p>TNC charges a fare for the services provided to passengers and discloses:</p> <ul style="list-style-type: none"> • Calculation method either on app or on website, • Applicable rates being charged and the option to receive an estimated fare before committing to the transaction, • An electronic receipt to the passenger that includes origin destination of trip and total time and distance of trip and itemization of fare paid.
Insurance	<p>TNC maintains valid and current commercial liability insurance with a minimum liability amount of \$1,000,000 (varies by jurisdiction) and file insurance certificate with governing body.</p> <p>Insurance must provide coverage for drivers and vehicles from the time the TNC app is turned on, to the time the driver turns off the app.</p> <p>TNC required to have insurance coverage in place regardless of whether a TNC driver maintains insurance adequate to cover any portion of the claim.</p> <p>TNC requires drivers to maintain commercial liability insurance coverage.</p>
Criminal Background Checks and Driving Checks	Prior to permitting an individual to act as a TNC driver, TNC require driver to undergo criminal background check and driving check to ensure that minimum requirements are met. These thresholds vary across jurisdictions but would rule out drivers

	<p>convicted of major violations and/or who exceed minimum number of demerit points.</p> <p>TNC driver results in these checks are made available to governing body upon request and audit. Where driver's status changes with TNC, or when a driver's criminal background check does not meet minimum thresholds, governing body is notified.</p>
Training	<p>TNC establishes a driver training program to ensure that all drivers are safely operating the vehicle prior to driver being able to offer the service and includes training on how to properly handle mobility devices and treat individuals with disabilities in a respectful manner.</p> <p>TNC makes the training program available to the governing body.</p>
Non-discrimination	<p>TNC to ensure that all drivers comply with all laws pertaining to non-discrimination against passengers based on pickup or drop-off destination, race, sex, age, disability, or usage of a service animal.</p> <p>TNC to include option for accessible vehicle and if accessible vehicle is not available, TNC to direct the passenger to an alternate provider of accessible service.</p> <p>TNC to ensure that the app and website rating system of the drivers/vehicle and passengers is not based on discrimination and includes the option for passengers to opt-out of the rating system from the outset of enrolling with the TNC app.</p>
Record Collection and Data Reporting	<p>TNC provides the governing body regular reports that include:</p> <ul style="list-style-type: none"> • Number of new qualifying drivers. • Monthly trip records that include trips requested and fulfilled by geographic endpoints (i.e. 3-digit postal code) and date/time. • Trips not fulfilled with reason and geographic endpoints. • Complete complaint data. • Complete accident data related to TNC drivers who were driving with the app turned on.

	<ul style="list-style-type: none"> • Driver and transaction data: • All trips requested and fulfilled with driver name and plate numbers. • Transactions, drivers, and trips including information relating to specific trips and/or drivers and/or vehicles that may be involved in an investigation by the City of Toronto.
Communication	<p>TNC to clearly disclose on the app and the website that TNCs facilitate rides between passengers and private drivers using their own personal vehicles.</p> <p>TNC valid insurance certificate to be made available on website and app.</p> <p>TNC to provide passengers with a photo of the driver, vehicle details, and the driver's licence plate number on the app.</p>
Driver Requirements	<p>Prior to permitting an individual from becoming a TNC driver, TNC ensures that driver holds an unrestricted and fully privileged driver's licence.</p> <p>TNC drivers can only use TNC pre-arranged trips and not respond to street hails.</p> <p>TNC drivers to display TNC identifier that is visible from the exterior of the vehicle. This identifier is filed with the governing body.</p> <p>TNC is to be able to provide proof of both their personal insurance and the commercial insurance in the case of an accident.</p>
Vehicle Requirements	<p>TNCs to ensure that TNC drivers are using vehicles that are properly registered and regularly inspected by a licensed facility (frequency and criteria vary across jurisdictions). TNC to keep documentation of inspection reports and make them available to the governing body upon request.</p>

Insurance for Ground Transportation Providers

Taxicab and Limousine Insurance

The City's bylaws governing taxicabs and limousines prescribe the extent of insurance coverage required by every municipally-licensed taxicab and limousine in Toronto and are specified in Toronto Municipal Code, Chapter 545, under sections 149 and 479 respectively. Both of these regulations require:

- At least the amount of \$2,000,000 (exclusive of interest and costs) comprehensive against loss or damage resulting from bodily injury to or the death of one or more persons, or from loss or damage to property resulting from any one accident;
- The policy shall make provision for passenger hazard in an amount not less than the foregoing.
- A certified copy or certificate of such policy shall be deposited with the Municipal Licensing and Standards Division.
- The policy of insurance and the certified copy or certificates shall include the name of every person having an interest in the taxicab, including any lessee of the taxicab.
- The Executive Director or his or her designate may suspend a taxicab/limousine owner's licence where:
 - there has been a failure to comply ; and/or
 - where there has been a cancellation of a policy of insurance filed; where
 - the suspension shall continue until there has been satisfactory compliance with the Insurance provision.

This level of coverage was enacted in 2003, and while at that time the minimum required by the bylaw was set at \$1,000,000, staff undertook a review of the filed policies and found that despite the minimum of \$1,000,000 being prescribed, the businesses had actually self-regulated and obtained the appropriate amount of insurance coverage in order to align themselves with current insurance market values.

Uber's Public Statements about the Sufficiency of Insurance Coverage

Uber has been persistent that drivers and passengers are protected by sufficient insurance when driving or riding in an UberX vehicle. Uber requires their drivers to have their own vehicle insurance coverage and has maintained that every UberX ride is backed by insurance covering bodily injury and property damage for both drivers and passengers. Uber's website has the following to say about the nature of its insurance coverage:

Every ride on the uberX platform in Canada is backed by \$5,000,000 of contingent auto liability insurance covering bodily injury and property damage. In

the event of an accident during an uberX trip, passengers, pedestrians, other drivers, and the community at large can rest assured knowing that ridesharing partners are well covered by commercial auto insurance in addition to any insurance coverage maintained by the driver. This \$5,000,000 of liability coverage is more than two times the liability requirement for taxi and limo insurance in all Canadian cities, and is written by an insurance company rated A (excellent) AM Best rating.

Uber's Legal Agreements with Users and Drivers

Uber's legal relationship with its "partner" drivers is set out in its "Transportation Services Provider Agreement". This agreement outlines provisions in respect to Insurance coverage, which in summary, requires drivers to maintain third-party auto insurance and provide proof of insurance coverage to Uber.

They state that "as an express condition of doing business with the Company, and at your sole expense, you agree to maintain current during the life of this Agreement, third-party auto insurance of the types and amounts specified herein for every vehicle used to perform services under this Agreement. You acknowledge that it is your responsibility, prior to your commencement of the P2P transportation service, to: A) inform your insurer of the P2P transportation service you provide; and B) ensure that your insurance policy provides coverage for the P2P transportation service you provide."

The agreement indicates their rights to terminate the agreement for failure to comply with any of the provisions of the agreement, including insurance, and further indemnifies Uber for all liability.

In the consultation meeting with Uber, they provided the following statement in respect to "Rideshare (UberX)" insurance:

- *Drivers maintain personal insurance*
- *We maintain contingent insurance for third-party injury and damage*
 - *Pays out if personal policy is exhausted or no other coverage available*
 - *Satisfies bylaw \$ requirement*

Insurance Regulators Comments Regarding the Sufficiency of Insurance

The Financial Services Commission of Ontario ("FSCO") and the Insurance Bureau of Canada ("IBC") have taken public positions questioning the sufficiency of personal

automobile insurance to protect drivers and passengers who participate in ridesharing services such as Uber.

FSCO and Insurance Bureau of Canada

On March 24, 2015, FSCO published an infographic on its website warning about the insurance risks related to ride-sharing programs. The infographic noted that ridesharing:"

“services may significantly impact your insurance coverage” as standard auto insurance policies exclude coverage when the vehicle is used to carry paying passengers or used as a taxi.

Passengers are cautioned “you may not be protected against certain damages, losses and liabilities.” To find out if they are covered, passengers are advised to “ask your driver.” Drivers are advised “if you are intending to participate in a ride-sharing service as a driver, you should check with your auto insurance representative to ensure you have proper insurance that protects the driver, passenger and others. It’s also a good idea to seek independent legal advice before you sign on.”

IBC has made public statements warning about the inadequacy of personal auto insurance when driving or using an Uber vehicle and their website contains warnings to drivers in the form of a “Question and Answer” section about Transportation Network Companies (TNC’s).

The standard automobile policy excludes coverage if the vehicle is used to carry paying passengers. IBC encourages drivers operating their vehicle for a TNC to contact their insurance representative to make sure they have proper coverage.

IBC has also made statements through its spokespersons, indicating that coverage under a personal automobile policy could lead to a rejected claim when a driver is using their vehicle for commercial purposes.

The Alberta Superintendent of Insurance issued an advisory notice in 2015 on ride sharing services and the insurance risk they currently pose to passengers and drivers. It further states that *they are going to work with Uber and others, through a working group to find ways for the ride sharing service to safely and legally operate in the province.*

Summary of TNC Insurance Requirements in Other Jurisdictions

California, Illinois and the District of Columbia specify different levels of insurance based on whether the driver has “accepted” a request or is merely “logged on” to the company’s platform.

The fundamental aspects of the coverage are that the insurance requirements apply from the moment a driver accepts a request using the TNC’s platform until the driver completes the transaction or the ride is complete. **During this period, the TNC insurance is primary.** TNC’s are given the option to provide this primary coverage in a combination of ways – note that the insurance can be maintained by the driver or the TNC.

A different set of insurance requirements apply from the moment the driver logs on the platform until the driver accepts a ride request, and in the moments after a driver drops off a ride and is “waiting” to accept another ride request. Essentially, these requirements cover the periods in between rides. Again, the TNC insurance is primary. TNC’s are given the option to provide this coverage in a variety of ways and can meet their requirements under the section through a TNC policy obtained by a participating driver. The amount of coverage required is lower at this stage than when a driver has accepted a ride and is actively carrying a passenger.

City's Position in respect to Insurance Coverage

The City of Toronto has not received proof of adequate insurance coverage from Uber. During the court application, Uber sought a "sealing order" to prevent disclosure of their insurance policy, by claiming that it was proprietary. The court ruled against them, and Uber subsequently filed a "certificate of insurance" for a "standard non-owned policy", but the City is unable to determine this policy is sufficient, particularly in light of the comments of various regulatory bodies for the insurance industry

The development and procurement of a suitable insurance product is a mandatory requirement before any advancement of a regulatory regime to permit the operations of UberX or other currently unlicensed operators could be considered. The level of protection afforded passengers in taxicabs and limousines ought not be compromised or lessened.

Should such regulation be contemplated, then the City would require that the period of coverage during which a passenger is being transported, **be maintained at the same level as that currently required by City of Toronto taxicabs/limousines:**

- At least the amount of \$2,000,000 (exclusive of interest and costs) comprehensive against loss or damage resulting from bodily injury to or the death of one or more persons, or from loss or damage to property resulting from any one accident;
- The policy shall make provision for passenger hazard in an amount not less than the foregoing.

Industry Stakeholder Roundtables

Between July and August, 2015, Municipal Licensing & Standards (ML&S) and the City of Toronto's Public Consultation Unit (PCU) hosted industry stakeholder roundtables to better understand:

- the impact of Uber's operations on the industry and
- how the City might improve its regulations to level the playing field in the industry while still ensuring that the public is protected.

ML&S and PCU held six roundtable meetings each with 10-15 industry participants from the taxi and limousine industry. Each of the meetings were approximately 90 minutes in length. The groups included participation from the following industry stakeholders:

1. Taxicab drivers
2. Taxicab Owners
3. Taxicab Fleet Operators
4. Taxicab Brokerages
5. Limousine Industry

Each of the taxicab and limousine stakeholders' roundtable meetings focused the discussion on three key questions. Below is a summary of the responses to each of these key discussion questions from these meetings.

Discussion questions

1. How have you been impacted by the operations of Uber?

Taxicab Drivers indicated that:

- They are losing income and business because customers are looking for cheaper prices for rides. The flat rate needs to go down.
- There has not been a big change in shift rates.
- Uber operations demonstrate that there is a need for more taxicabs. Uber should be a legal brokerage.

Taxicab Owners indicated that:

- Because of Uber there are longer wait times for fares. The effect is that some drivers aren't driving and cabs are sitting in lots. Night drivers are most impacted and there are less street hails.
- The Uber app is not the issue because it allows drivers to supplement their income it is the other activities. Uber is taking money out of the local economy and tempting taxi drivers to join them.
- The public perception of Uber is negative for the taxi industry.
- The average wait time for passengers has also increased.
- Maintenance costs are high and they can't compete with Uber's rate.

Taxicab Fleet Operators indicated that:

- High overhead costs and low business mean that fleet operators are having trouble breaking even.
- Drivers' income is down and they are no longer working for the fleet operators.

Taxicab Brokerages indicated that:

- There is less demand for taxis as the market is saturated, drivers are frustrated and are quitting. The number of unused taxis is growing.
- Drivers are feeling confused and disheartened –brokerages feel the need to keep drivers working in a positive way.
- Drivers know they can make more money on nights and weekends with Uber. Brokerages are losing drivers and can't accurately predict how many cars they have in the field because drivers can choose to take an Uber request.
- Point of sale business is down, debit and credit card use is down.

Limousine industry indicates that:

- As a regulated industry it is a challenge to compete with Uber which means lost income and lower shift rental rates.
- Taxi industry is more affected than the limo industry.
- Limo owner/operators have Uber on their phone and Uber is recruiting drivers.
- Service agreements are enabling Uber to have a supply of sedans.

2. If City Council permitted UberX, what would you need to better compete?

Taxicab Drivers indicated that:

- There is not enough enforcement of Uber.
- Fare structure should be the same.
- All drivers should require commercial insurance and training.
- City controls a number of licenses and the waiting list is not accessible.

Taxicab Owners indicated that:

- Uber needs to have the same regulations and restrictions as the rest of the industry. Uber's pricing should be consistent with taxi prices. All vehicles should have the same licence.
- The investment in plates needs to be protected.
- Some felt this question was not clear.

- Licensing fee, refresher courses, accessibility and insurance costs all need to change. Or requirements need to be consistent for Uber.
- They are concerned with the lack of enforcement of Uber given the safety risk.
- Reduced initial fares, flat fares and ride-sharing may help.

Taxicab Fleet Operators indicated that:

- City should allow fleets to keep older vehicles in operation longer and more flexibility in model of cars required.
- City should allow fleets to own multiple plates and lease to drivers. Require fleets to be incorporated businesses.
- There should be sustainable income for drivers. City should allow split ownership of vehicles to lower insurance premiums. City should allow POS terminals to be more accessible, allow drivers to own terminals.

Taxicab Brokerages indicated that:

- Lower meter rates and get rid of training or allow brokerages to train.
- Reduction of regulatory costs is needed.
- Force everyone to have the same regulation.

Limousine industry indicated that:

- Enforcement of Uber's illegal operations is the key. Either the City should enforce or deregulate.
- Uberselect is not the cheapest option, Limos can compete.
- The whole industry including Uber should be subject to the same rules and regulation.

3. There are a number of regulations on taxicabs and limousines in place right now that protect the public, what needs to change and/or what needs to stay?

Taxicab Drivers indicated that:

- Police ticket drivers for mechanical problems when they should be ticketing the garages.
- UberX drivers are getting their tickets paid for by the company.
- Safety requirements should be the same for all drivers.

Taxicab Owners indicated that:

- The City should require that Uber operate the same way as the rest of the industry. There is a lack of enforcement. If regulations are not enforced why should drivers follow them?
- A rate review is needed.

- Training is provided by instructors who haven't driven a cab, drivers would like instructors who understand driving a taxi.
- If fares are reduced, driver expenses need to be reduced.

Taxicab Fleet Operators indicated that:

- Public safety measures not covered by Uber need to be determined. Educate the public on UberX liability.
- Enforce regulation on subleasing.

Taxicab Brokerages indicated that:

- Training needs to change to curb overhead fees.
- There needs to be repercussions for drivers who receive complaints such as demerit points. Enable the brokerage to discipline drivers.
- Get rid of refresher course. Keep training and focus on geography and customer service.
- Agents are not needed, arrange lease agreements directly with drivers.
- Refine and reduce loopholes in bylaws.

Limousine industry indicates that:

- It opposes driver training. It takes too long and is costly. Companies could offer their own in-house training.
- It would like to see the City get back to basics with regulation and just regulate to protect the public safety not the market.
- There needs to be a minimum regulation for rates for limos. If the City takes away the minimum fare and driver training, there will be more competition at lower rates.
- Taxis and limos are different and such have different bylaws.

City of Toronto Industry Survey Results

As a component of the Ground Transportation Review, Municipal Licensing & Standards (ML&S) conducted two surveys about Ground Transportation, one aimed at the general public and the second aimed at Toronto taxicab industry licensees. Both surveys were posted from July 27, 2015 to August 16, 2015 on the ML&S website Public Consultation section, www.toronto.ca/mlshaveyoursay.

This document provides a summary of findings for the Industry Survey.

The Industry Survey

In addition to being available online, the survey for the taxicab and limousine industry was also distributed in a word document at the request of the taxicab industry. This survey included 48 service related questions and 2 demographic questions. Of the 48 service questions 7 questions requested that the respondents include additional comments. Paper copies were then consolidated with the online survey between August 17 and 21, 2015.

ML&S received 6318 total responses; a majority of responses were from UberX drivers. This survey was circulated via social media, including by Uber. Although it does not appear as though any one person or group purposely took the survey many times with the intention of impacting the results.

Due to the volume of respondent comments, ML&S procured Ipsos-Reid to objectively select a random sampling of comments to codify and identify key themes for each question that allowed additional comments.

The demographics of the total respondents are as follows:

- The vast majority (94.4%) of total respondents completed the survey in Canada, some (1.7%) in the U.S. and the rest completed the survey from other parts of the world.
- 93.1% identified as male, 6.2% identified as female and 0.7% identified other.
- The majority (30.2%) of respondents were between the ages of 35-44. Others (24.9%) were 25-34 years old, 26.3% were 45-54 years old, 12% were 55-64 years old, 4% were 15-24 years old and 2.5% were over 65 years old.
- 82.8% indicated they were Uber drivers (including UberX, UberSelect, or UberPool drivers), 11.4% indicated that they were taxicab drivers, 5.1% indicated that they were taxicab owners, 1.9% indicated that they were limo drivers, 1.1% were limo owners, 0.3% were a taxicab brokerage, 0.4% were a limousine service

company, 0.4% were a garage or fleet, 0.4% were a designated agent, and 4.7% had a different relationship to the taxicab industry.

1. Please indicate which Uber services you have worked with.

Of those who responded, 96% worked for UberX, 17.9% worked for UberPool, 12.8% worked for UberXL, 5.3% worked for UberSelect, 3.2% worked for UberTaxi, 1.3% worked for UberBlack and 1.1% worked for UberAccess.

2. For what reasons did you decide to work with Uber?

Of those who responded, 80.1% indicated that the technology makes it safer for me to do my job, 37.4% indicated that it was easy to sign-up, 29.6% indicated that I prefer to pay them only when I provide a trip, 11.7% indicated that it was because other drivers are using Uber and I didn't want to be left behind, and 27.1% had other reasons. Of comments sampled, the most common reason were convenience (35.30%), income benefits (40.20%), and appeal (18.20%).

Why do you think the public use Uber services? Rank by level of importance 1= most important and 6=Least important.

3. Uber can charge a lower fare

Of those who responded, 58.8% rated this the most important, 17.4% the 2nd most important, 8.8% the 3rd most important, 6.3% the 4th most important, 4.5% 5th most important and 4.3% the least important reason for the public to use Uber services.

4. The technology makes it easier to order a taxi

Of those who responded, 20% rated this the most important, 42.6% the 2nd most important, 16.7% the 3rd most important, 9.4% the 4th most important, 6.7% the 5th most important, and 4.6% the least important reason for the public to use Uber services.

5. The public have a bad opinion of the taxi/limo industry

Of those who responded, 13.7% rated this the most important, 16.1% the 2nd most important, 29% the 3rd most important, 11.7% the 4th most important, 12.3% the 5th most important and 17.2% rated this the least important reason for the public to use Uber services.

6. The public like that they can rate the driver

Of those who responded, 2.3% rated this the most important, 6.8% the 2nd most important, 17.6% the 3rd most important, 35.9% the 4th most important, 22% the 5th most important and 15.3% the least important reason for the public to use Uber services.

7. The technology provides more safety tools

Of those who responded, 12.3% rate this the most important, 12.4% the 2nd most important, 16.5% the 3rd most important, 18.7% the 4th most important, 31.1% the 5th most important and 9.1% the least important reason for the public to use Uber services.

8. The public wants to be able to use their credit card

Of those who responded, 2.5% rate this the most important, 6.2% the 2nd most important, 10.4% the 3rd most important, 15.9% the 4th most important, 20.8% the 5th most important and 44.2% the least important reason for the public to use Uber services.

9. Do you feel that City of Toronto is impacting your ability to compete with Uber?

Of those who responded, 51.3% indicated yes and 48.7% indicated no. Of those sampled, 39.74% indicated no impact. Of those 23.25% which indicated an impact the reasons provided were the cost of the taxi and regulatory differences with Uber.

However, when ML&S filtered out Uber drivers, a higher percentage (65.3%) indicated that the City of Toronto is impacting their ability to compete with Uber.

Please indicate your level of agreement to the following statements. Toronto should:

10. Regulate fares charged by UberX, UberXL, and UberSelect drivers

Of those who responded, 20.9% strongly agreed, 12.1% agreed, 15.5% disagreed, 34.7% strongly disagreed and 16.8% were neutral or had no opinion.

However, when ML&S filtered out Uber drivers, a higher percentage (42%) strongly agreed.

11. Limit the number of UberX, UberXL, and UberSelect drivers allowed to operate in Toronto

Of those who responded, 13.7% strongly agreed, 8.1% agreed, 19.1% disagreed, 49.2% strongly disagreed and 9.9% were neutral or had no opinion. However, when ML&S filtered out Uber drivers, a higher percentage (35.9%) strongly agreed.

12. Stop all Uber services in Toronto

Of those who responded, 9.3% strongly agreed, 0.9% agreed, 7.0% disagreed, 80.4% strongly disagreed and 2.4% had no opinion. However, when ML&S filtered out Uber drivers, a higher percentage (37.9%) strongly agreed.

13. Stop UberX, UberXL, and UberSelect

Of those who responded, 12.5% strongly agreed, 0.7% agreed, 6.4% disagreed, 78.4% strongly disagreed and 2% were neutral or had no opinion. However, when ML&S filtered out Uber drivers, a higher percentage (51%) strongly agreed.

14. Perform police background checks on Uber drivers

Of those who responded, 55% strongly agreed, 25.2% agreed, 3.2% disagreed, 6.0% strongly disagreed and 10.6% were neutral or had no opinion. However, when ML&S filtered out Uber drivers, a higher percentage (62.4%) strongly agreed.

15. Monitor and ensure that adequate insurance is in place for Uber drivers

Of those who responded, 33.2% strongly agreed, 28.2% agreed, 6.7% disagreed, 10.2% strongly disagreed and 21.8% were neutral or had no opinion. However, when ML&S filtered out Uber drivers, a higher percentage (58.2%) strongly agreed.

16. Permit Uber services, but only if they fall within existing regulations

Of those who responded, 14.7% strongly agreed, 16.9% agreed, 15.6% disagreed, 28.1% strongly disagreed and 24.7% were neutral or had no opinion. However, when ML&S filtered out Uber drivers, a higher percentage (36.7%) strongly agreed

17. Change regulations to permit Uber to operate

Of those who responded, 50.1% strongly agreed, 17.2% agreed, 7% disagreed, 14.4% strongly disagreed and 11.3% were neutral or had no opinion. However, when ML&S filtered out Uber drivers, a lower percentage (34.3%) strongly agreed

18. What do you think the City should change in its regulation of the taxicab industry?

Of those who responded, 52% think Toronto should not regulate fares/tariff, 49.7% think Toronto should not limit taxicab ownership/licence issuance, 42.3% think that Toronto should not regulate the type of vehicles, 25.2% think that Toronto should not regulate equipment (cameras, tires, etc) and 17.4% think there are other things that should be changed. Of the comments sampled, 74.10% supported regulation including drivers, vehicles, market regulation and Uber. However, 1.00% of respondents sampled were opposed to regulation.

19. How do you operate your taxicab?

Of those who responded, 45.2% identified paying a shift rental rate, 32.7% owned their own taxicab and drive it, 15.2% pay a lease fee for their taxicab, and 6.9% own their taxicab but do not drive it.

20. Since Uber began operating, how have the number of fares you receive from your licensed taxicab brokerage changed?

Of those who responded, 78.2% identified that the number of fares decreased, 5% identified that the number of fares stayed the same, 5.6% identified that they didn't know, 2.8% identified that the number of fares increased and 8.4% identified that they did not work at a brokerage, so it did not apply to them.

21. How has your shift rental rate changed in the last year?

Of those who responded, 53.7% were paying the same amount, 36.5% were paying less, and 9.8% were paying more.

22. How has your lease rate changed in the last year?

Of those who responded, 55.4% were paying the same amount, 30% were paying less, and 14.6% were paying more.

Please indicate your level of agreement to the following statements.

23. The City of Toronto initial 17-days taxicab driver training is important

Of those who responded, 52.8% strongly agreed, 19.1% agreed, 9.5% disagreed, 10% strongly disagreed and 8.5% were neutral or had no opinion.

24. The City of Toronto refresher taxicab training is important

Of those who responded, 26.3% strongly agreed, 15.5% agreed, 22% disagreed, 24.7% strongly disagreed and 11.5% were neutral or had no opinion.

25. The City of Toronto regulated taxicab fares should decrease

Of those who responded, 24.2% strongly agreed, 22.9% agreed, 15.3% disagreed, 18.6% strongly disagreed and 19% had no opinion.

26. The City of Toronto shouldn't regulate taxicab fares

Of those who responded, 16.5% strongly agreed, 13.5% agreed, 21.2% disagreed, 33.7% strongly disagreed and 15.1% were neutral or had no opinion.

27. Owner-operated taxicabs are better for the industry

Of those who responded, 43.1% strongly agreed, 16.5% agreed, 10.2% disagreed, 12.9% strongly disagreed and 17.4% were neutral or had no opinion.

28. People should only be able to own one taxicab

Of those who responded, 55.8% strongly agreed, 11.8% agreed, 9.2% disagreed, 11.6% strongly disagreed and 11.6% were neutral or had no opinion.

29. Current taxicab vehicle regulations are working

Of those who responded, 23.8% strongly agreed, 23% agreed, 18.7% disagreed, 19.1% strongly disagreed and 15.4% were neutral or had no opinion.

30. Cameras in taxicabs are important safety equipment

Of those who responded, 67.1% strongly agreed, 19.6% agreed, 3.5% disagreed, 2.2% strongly disagreed and 7.5% were neutral or had no opinion.

31. Emergency flashing lights are important safety equipment

Of those who responded, 61.9% strongly agreed, 22.2% agreed, 4.2% disagreed, 3.6% strongly disagreed and 8.1% were neutral or had no opinion.

32. Overall, how have the operations of Uber in Toronto negatively or positively impacted you?

Of the comments sampled, 81.41% were positively impacted for reasons such as appeal, benefits and convenience. Of those 12.96% were negatively impacted for reasons such as lost wages and slow business.

Please indicate your level of agreement to the following statements.

33. The City of Toronto should regulate the minimum fare for limousines

Of those who responded, 44.1% strongly agreed, 20.7% agreed, 11.7% disagreed, 11% strongly disagreed and 12.4% were neutral or had no opinion.

34. The minimum fare for limousines should decrease

Of those who responded, 15.2% strongly agreed, 17.9% agreed, 22.1% disagreed, 26.9% strongly disagreed and 17.9% were neutral or had no opinion.

35. The City of Toronto should mandate the ratio of sedan limos to stretch limos

Of those who responded, 22.4% strongly agreed, 16.8% agreed, 14.7% disagreed, 22.4% strongly disagreed and 23.8% were neutral or had no opinion.

36. The 20-minute pre-booking time is fair

Of those who responded, 15.9% strongly agreed, 22.1% agreed, 18.6% disagreed, 20.7% strongly disagreed and 22.8% were neutral or had no opinion.

37. Limousine vehicle regulations are fair

Of those who responded, 17% strongly agreed, 28.4% agreed, 16.3% disagreed, 18.4% strongly disagreed and 19.9% were neutral or had no opinion.

38. How do you operate your limousine?

Of those who responded, 57.3% own their limousine and drive it, 19.7% pay a shift rental rate, 18.8% pay a lease fee for my limousine and 4.3% own their limousine but do not drive it.

39. Since Uber began operating, how have the number of fares you receive from your licensed limousine service company changed?

Of those who responded, 44.2% identified that the number of fares decreased, 15.4% identified that the number of fares increased, 13.5% identified the number of fares stayed the same, 9.6% identified they didn't know, and 17.3% identified that they don't work for a limousine service company, so this does not apply to them.

40. How has your shift rental rate changed in the last year?

Of those who responded, 80% identified that they pay the same, 16% identified that they pay more, and 4% identified that they pay less.

41. Why does you think your shift rental rate changed?

Of comments sampled, the most common reasons were competition (41.20%) and lack of work (54.10%).

42. How has you lease rate changed in the last year?

Of those who responded, 54.2% identified that they pay the same, 41.7% identified that they pay more and 4.2% identified that they pay less.

43. Why do you think your shift lease rate changed?

Of comments sampled, the most common reasons were competition (25.50%) and lack of work (67.40%).

44. How many hours do you work in a typical week?

Of those who responded, 26.3% indicated 11-20 hours per week, 18.1% indicated 21-30 hours per week, 17.6% 6-10 hours per week, 14.2% 31-40 hours per week, 9% indicated 3-5 hours per week, 6.8% indicated 41-50 hours per week, 4.2% indicated 1-2 hours per week, 3.8% indicated more than 50 hours per week.

45. How many passengers do you pick up in a typical week?

Of those who responded, 20.3% indicated that they pick up more than 50 passengers, 19.2% indicated 21-30 passengers, 19% indicated 11-20 passengers, 14.5% indicated 31-40 passengers, 9.7% indicated 41-50 passengers, 9.6% indicated 6-10 passengers and 7.7% indicated 1-5 passengers.

46. What is the average cost of a trip for a passenger in your vehicle?

Of those who responded, 39.8% indicated \$8-10, 36.4% indicated \$11-14, 11.3% indicated \$15-19, 8.3% indicated \$5-7, 3.2% indicated \$20-25, and 1% indicated more than \$25.

47. On average, what percentage of your customers do you receive through Uber?

Of those who responded, 81.6% indicated 76-100%, 7.8% indicated 51-75%, 4.4% indicated 26-50%, 4.1% indicated 11-25%, and 2.1% indicated less than 10%.

48. Do you think the City of Toronto should regulate UberX, UberXL, or UberSelect?

Of those who responded, 67.3% indicated no and 32.7% indicated yes. Of comments sampled the most common responses were: Uber should not be regulated (41.86%) or Uber should be regulated (12.29%) and other positive Uber comments (35.60%)

City of Toronto Public Survey Results

As a component of the Ground Transportation Review, Municipal Licensing & Standards (ML&S) conducted two surveys about Ground Transportation, one aimed at the general public and the second aimed at Toronto taxicab industry licensees. Both surveys were posted from July 27, 2015 to August 16, 2015 on the ML&S website Public Consultation section, www.toronto.ca/mlshaveyoursay.

This document provides a summary of findings for the Public Survey

The Public Survey

ML&S received 73, 536 total responses from members of the public. This survey included 22 service related questions and 2 demographic questions. Of the 22 service questions 13 questions requested that the respondents include additional comments. This survey was circulated via social media, including by Uber. Although it does not appear as though any one person or group purposely took the survey many times with the intention of impacting the results.

Due to the volume of respondent comments, ML&S procured Ipsos-Reid to objectively select a random sampling of comments to codify and identify key themes for each question that included additional comments.

The demographics of the total respondents are as follows:

- The vast majority (91.1%) of total respondents completed the survey in Canada, some (4.5%) in the U.S. and the rest completed the survey from other parts of the world.
- 54.5% identified as male, 44.9% identified as female and 0.6% identified other.
- The majority (45.4%) of respondents were between the ages of 25-34. Others (23.1%) were 15-24 years old, 16.9% were 35-44 years old, 8.5% were 45-54 years old, 4.4% were 55-65 years old and less than 2% were over 65 years old.

1. Which types of services do you use?

When asked which types of services they used, the majority of respondents (93.8%) indicated that they used Uber, while 62% indicated taxicabs and 17.1% indicated limousines.

2. Which types of Uber services do you use?

For those that identified using Uber, the survey asked respondents to identify which types of Uber they use. The majority (85.8%) of respondents identified that they use UberX, followed by UberTaxi (38.3%), UberBlack (23.8%), UberXL (22.2%) UberPool (10.3%), UberSelect (5.4%), UberAccess (0.7%) and other service (2.7%).

3. How do you/did you used to connect with taxicab services?

When asked how they did/do connect with taxicab services, the results indicates that that respondents used multiple ways of connecting with services. The largest (63%) percentage of respondents hailed a taxicab on the street, while 57.1% of respondents used the Uber app, 50.1% called a brokerage and 8.8% used a brokerage app other than Uber.

4. You have indicated that you use Uber to connect with a ground transportation service. How has that impacted the ground transportation you use?

For those who have indicated that they use Uber to connect with services, the majority (50.9%) indicated that they used to take taxis and now have changed to Uber, 40.7% indicated that they use Uber as well as public transit and/or taxis, 4.2% indicated that they used to take public transit and now take Uber and 4.1% indicated that they just started hiring ground transportation and only usually use Uber.

5. Why are you now using an Uber service instead of taxi service?

For those who have indicated that they are now using an Uber services instead of a taxi service, 92.9% indicated that the service is faster, 94.5% indicated the cost is cheaper, 85.8% indicated that the vehicles are cleaner and 62.9% indicated other reasons.

Of those sampled, key reasons included customer service (70.33%), safety (22.13%), convenience (12.6%), and payment (12.2%),

6. Please rate you satisfaction with taxis.

Of those who responded, 41.9% were dissatisfied with taxis, 22.1% were extremely dissatisfied, 13.1% were satisfied, 7% were very satisfied and 15.9% were neutral or had no opinion.

Of those sampled, 19.76% of respondents were satisfied citing reasons such as convenience, reliability, drivers and previous experience. However, 64.47% of others noted that they were unsatisfied citing the following reasons including drivers, fares,

vehicles. Respondents may have commented on various experiences which were both positive and negative and may have noted more than one reason for their rating.

7. Please rate your satisfaction with limousines.

Of those who responded, 50.2% were satisfied with taxis, 25.4% were very satisfied, 5.3% were dissatisfied, 1% were extremely dissatisfied and 18.1% were neutral or had no opinion.

Of those sampled, 69.24% were satisfied citing reasons such as vehicles, drivers, reliability and appeal. However, 33.83% of respondents were unsatisfied citing reasons such as, fares. Those 15.23% who had indicated neither unsatisfied nor satisfied noted they only use the service for work or to go to the airport and limited experience with the service.

8. Please rate your satisfaction with public transit.

Of those who responded, 39.4% were satisfied with public transit, 26.4% were dissatisfied, 6.3% were extremely dissatisfied, 4.6% were very satisfied and 23.3% were neutral or had no opinion.

Of those sampled 39.75% were satisfied citing reasons such as reliability, fares and appeal. However, 59.23% of respondents sampled were unsatisfied citing reasons such as, lack of convenience, long wait times and experience. Those 8.27% who had indicated neither unsatisfied nor satisfied cited limited experience with the service.

9. Please rate your satisfaction with UberTaxi.

Of those who responded, 46% were very satisfied with UberTaxi, 16.9% were satisfied, 2.2% were dissatisfied, 1.0% were extremely dissatisfied, and 33.9% were neutral or had no opinion.

Of those sampled 45.58% were satisfied citing reasons such as convenience, drivers, and fares. However, 37.41% of respondents were unsatisfied citing reasons such as, they had not used the service. Those 14.67% who had indicated neither unsatisfied nor satisfied noted limited experience with the service.

10. Please rate your satisfaction with UberBlack.

Of those who responded, 76.4% were very satisfied with UberBlack, 18.5% were satisfied, 0.4% were dissatisfied, 0.3% were extremely dissatisfied and 4.4% were neutral or had no opinion.

Of those sampled, 76.66% were satisfied citing reasons such as vehicles, drivers, appeal and convenience. However, 24.57% of respondents were unsatisfied citing reasons such as, fares. Those 4.42% who had indicated neither unsatisfied nor satisfied cited limited experience with the service.

11. Please rate your satisfaction with UberX.

Of those who responded, 85.9% were very satisfied with UberX, 12.3% were satisfied, 0.4% were dissatisfied, 0.4% were extremely dissatisfied and 12.3% were neutral or had no opinion.

Of those sampled 78.91% were satisfied citing reasons such as convenience, vehicles, drivers, reliability and fares. However, 1.14% of respondents were unsatisfied citing reasons such as, fares and experiences. Those (less than 1%) who had indicated neither unsatisfied nor satisfied cited limited experience with the service.

12. Please rate your satisfaction with UberXL.

Of those who responded 77.4% were very satisfied, 17% were satisfied, 0.4% were dissatisfied, 0.3% were extremely dissatisfied and 4.9% were neutral or had no opinion.

Of those sampled, 55.63% were satisfied citing reasons such as convenience, vehicles, appeal, reliability and fares. However, 2.33% of respondents were unsatisfied citing reasons such as, fares and experiences. Those 4.66% who had indicated neither unsatisfied nor satisfied cited limited experience with the service.

13. Please rate your satisfaction with UberPool.

Of those who responded 65.2% were very satisfied, 21.3% were satisfied, 1% were dissatisfied, 0.3% were extremely dissatisfied and 12.3% were neutral or had no opinion.

Of those sampled, 66.26% were satisfied citing reasons such as convenience, and fares. However, 7.29% of respondents were unsatisfied citing reasons such as lack of experience. Those 10.2% who had indicated neither unsatisfied nor satisfied cited limited experience with the service.

14. Please rate your satisfaction with UberSelect.

Of those who responded, 77.8% were very satisfied, 15.9% were satisfied, 0.5% were dissatisfied, 0.4% were extremely dissatisfied and 5.4% were neutral or had no opinion.

Of those sampled, 66.58% were satisfied citing reasons such as convenience, vehicles, drivers, appeal and fares. However, 5.57% of respondents were unsatisfied citing reasons such as, fares and experiences. Those 6.44% who had indicated neither unsatisfied nor satisfied cited limited experience with the service.

15. Please rate your satisfaction with UberAccess.

Of those who responded, 74.4% were very satisfied, 12.6% were satisfied, 2.1% were extremely dissatisfied, 0.5% were dissatisfied and 10.5% were neutral or had no opinion.

Of those sampled, 75.59% were satisfied citing reasons such as convenience, drivers, reliability and fares. However, 6.30% of respondents were unsatisfied citing reasons such as, limited experience. Those 3.15% who had indicated neither unsatisfied nor satisfied cited limited experience with the service.

**16. Please rate your satisfaction with the Uber service you indicated above.
(including UberEATS)**

Of those who responded, 80.7% were very satisfied with their Uber service, 15.2% were satisfied, 0.6% were dissatisfied, 0.3% were extremely dissatisfied and 3.2% were neutral or had no opinion.

Of those sampled, 7.33% were satisfied citing reasons such as appeal, food quality, convenience, price, and service. However, 1.14% of respondents were unsatisfied citing reasons such as, food quality and cost. Those who had indicated neither unsatisfied or satisfied which were 2.89% of respondents cited limited experience with the service.

17. The City of Toronto regulates taxicab fares. What do you think should happen to these fares?

Of those who responded, 71.5% thought that fares should decrease, 13.2% thought that they should stay the same, 1% thought fares should increase and 14.4% didn't know or had no opinion on fares.

18. Which of the following two statements are closest to your point of view?

Of those who responded, 59.3% indicated that taxis should have consistent and metered regulated fares. While 40.7% indicated taxis should have variable fares that fluctuate based on demand.

19. What are the main reasons you use Uber?

Of those who responded, it was clear that there are multiple reasons: 94.4% indicated it was the ability to pay through mobile app, 93.7% indicated that it was the ability to order the vehicle through the mobile app, 89.6% indicated that it was the ability to see the vehicle on its way, 90.6% indicated that it was the cost, 77.2% indicated that it was the ability to rate the driver, 72.2% indicated that it the time it takes to get a vehicle is shorter, 67.2% indicated customer service, 63.1% indicated trust, 45.8% indicated promotions, and 42% indicated the complaints process.

20. Please rate your agreement with the following statements.

It is important that taxicabs in Toronto are licensed by the City of Toronto.

Of those who responded, 16% strongly agreed, 21.1% agreed, 16.4% disagreed, 10.5% strongly disagreed and 36% were neutral or had no opinion

I want the City of Toronto to mandate adequate insurance of taxicabs.

Of those who responded, 19.5% strongly agreed, 33.9% agreed, 6.8% disagreed and 4.4% strongly disagreed and 35.4% were neutral or had no opinion.

I want the City of Toronto to verify adequate insurance of taxicabs.

Of those who responded, 20.7% strongly agreed, 36.7% agreed, 5.8% disagreed, 4% strongly disagreed and 32.9% were neutral or had no opinion.

I want the City of Toronto to mandate cameras in taxicabs.

Of those who responded, 21.5% strongly agreed, 28.5% agreed, 11.9% disagreed, 5.2% strongly disagreed and 32.9% were neutral or had no opinion.

I want the City of Toronto to regulate taxi fares.

Of those who responded, 18.8% strongly agreed, 26.1% agreed, 17.5% disagreed, 11.8% strongly disagreed and 25.8% were neutral or have no opinion.

Toronto taxicabs should be wheelchair accessible.

Of those who responded, 18% strongly agreed, 31.6% agreed, 6.9% disagreed, 4.2% strongly disagreed and 39.4% were neutral or had no opinion.

The City of Toronto should investigate when I have a complaint about a taxicab.

Of those who responded, 48% strongly agreed, 31.3% agreed, 6.2% disagreed, 2.6% strongly disagreed and 11.9% were neutral or had no opinion.

The City of Toronto should train taxi drivers.

Of those who responded, 26.5% strongly agreed, 20.9% agreed, 16.8% disagreed, 9.5% strongly disagreed and 26.2% were neutral or had no opinion.

Uber drivers should be required to follow the same regulations as taxi drivers in the City of Toronto.

Of those who responded, 10.3% strongly disagreed, 15.2% agreed, 27.7% disagreed, 24.6% strongly disagreed and 22.1% were neutral or had no opinion.

Uber should charge the same amount of money for trips as taxi services.

Of those who responded, 5.2% strongly agreed, 2.5% agreed, 25.2% disagreed, 60.5% strongly disagreed and 6.5% were neutral or had no opinion.

Regulations for taxi services should be relaxed to let taxis compete with Uber.

Of those who responded, 24.7% strongly agreed, 36.3% agreed, 9.4% disagreed, 9.1% strongly disagreed and 20.5% were neutral or had no opinion.

Uber should be allowed to operate in the City of Toronto, even if these services are not regulated as much as taxis.

Of those who responded, 73% strongly agreed, 16.6% agreed, 2% disagreed, 5.3% strongly disagreed and 3.2% were neutral or had no opinion.

People should be able to choose for themselves whether they want to use Uber or taxi services.

Of those who responded, 87.9% strongly agreed, 7% agreed, 0.7% disagreed, 2.7% strongly disagreed and 1.9% were neutral or had no opinion.

The City of Toronto should perform criminal background checks for taxi drivers.

Of those who responded, 59.2% strongly agreed, 25.8% agreed, 3.4% disagreed, 2% strongly disagreed and 9.7% were neutral or had no opinion.

The City of Toronto should perform criminal background checks for Uber drivers.

Of those who responded, 49.7% strongly agreed, 25.8% agreed, 6.9% disagreed, 4.7% strongly disagreed and 12.8% were neutral or had no opinion.

21. Which of the following two statements is closest to your point of view?

Of those who responded, 84.2% indicated that "other people say that Uber does not need to be as regulated as taxi services but ultimately it is the responsibility and choice of the customer to decide if they want to use either Uber or a taxi service" was closer to their point of view.

While 15.8% indicated that "Some people say that the same rules and regulations that apply to taxi services should apply to Uber, in order to ensure that the same standards and regulations apply to both services and to ensure that customers are sufficiently protected" was closer to their point of view.

22. Please provide any additional comments you might have.

Of the comments sampled, 63.64% of respondent comments were positive and are happy with Uber service. However, 20.14% of respondents wrote negative comments citing reasons such as, taxis should improve their model and cost. Those 28.05% who had indicated neutral comments cited various comments on regulations from impose/change regulations to keep government out of the industry.