UNIVERSITY OF TORONTO
FACULTY OF INFORMATION

November 29, 2021

General Government and Licensing Committee
10th floor, West Tower, City Hall
100 Queen Street West Toronto,
ON M5H 2N2

Dear Chair Paul Ainslie and members of the committee,

Re: GL 27.19 Update on Outstanding Vehicle-for-Hire Directives

I welcome this opportunity to contribute to your deliberations over updating Toronto's Vehicles-for-Hire regulations. My comments focus specifically on the importance of making all trip data submitted to the City open and publicly accessible.

I am a retired member of the Faculty of Information at University of Toronto, where as a computer scientist I taught and researched in the areas of information policy and information system design for 25 years. I am also a former member of the Digital Strategy Advisory Panel that provided Waterfront Toronto with advice regarding Sidewalk Labs 'smart city' proposal for the Quayside neighbourhood. My comments are made in a personal capacity.

As noted in the materials provided, the trip data that the Vehicle-for-Hire Bylaw requires taxicab brokers, limousine service companies and Private Transportation Companies to submit is crucial for the City to be able to make sound policies governing the whole Vehicle-for-Hire industry. Understandably it is a serious problem when not all members of this industry provide the required data, calling for measures to improve compliance.

But beyond this, the public benefits from this trip data would be greatly expanded if it were to be made open and publicly available. There are good reasons for such a policy, both on principle and more practically.

The City of Toronto is already committed to a general policy of open data through its membership in the [Cities Coalition for Digital Rights](), which it is enacting in part through its own [Open Data Initiative]().

Toronto would not be alone in making trip data open, as other leading cities already do - notably New York <https://www1.nyc.gov/site/tlc/about/tlc-trip-record-data.page and Chicago <https://data.cityofchicago.org/Transportation/Transportation-Network-Providers-Trips/m6dm-c72p> This has enabled a variety of initiatives that make the key practices of the VFH industry, such as fares, surge pricing, shared vs solo use, trip length and average speed, more publicly visible and understandable. See for example https://toddwschneider.com/

This public visibility of trip data is especially important with PTCs, which increasingly dominate the industry. They can be expected to resist the requirement of making their data open, but as the New York and Chicago cases indicate, they will do so if required.

It is worth noting here that Sidewalk Labs, evidently responding to public pressure, committed to making a de-identified version of all the data it was to collect in its proposed Quayside project open to all. De-identification of trip data will also be necessary in this case. While strict anonymization is very difficult or even impossible to achieve in general, several measures should be considered for providing adequate privacy protection. Technical measures include random "blurring" of timestamps as well as origin and destination locations. Legal measures include licensing agreements that prohibit re-identification.

I hope these remarks are helpful in your deliberations.

Sincerely,

Andrew Clement

Andrew Clement
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