

Memorandum



CITY OF DALLAS

DATE September 11, 2009

TO Members of the Transportation and Environment Committee:
Linda L. Koop (Chair), Sheffie Kadane (Vice Chair), Jerry Allen, Carolyn R. Davis, Tennell Atkins, Angela Hunt, Pauline Medrano, Delia Jasso and Ron Natinsky, Vonciel Jones-Hill

SUBJECT Taxicab Task Force Status Report – Temporary Modification of Insurance and Age Limit Requirements Briefing

Attached is the "Taxicab Task Force Status Report – Temporary Modification of Insurance and Age Limit Requirements" briefing that will be presented to you September 15, 2009.

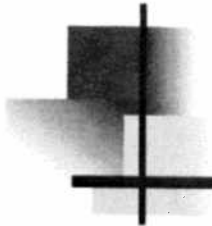
Please contact me if you need additional information.

A handwritten signature in black ink, appearing to read 'Jill Jordan', with a long horizontal flourish extending to the right.

Jill A. Jordan, P.E.
Assistant City Manager

- c: The Honorable Mayor and Members of the City Council
Mary K. Suhm, City Manager
Thomas P. Perkins, Jr., City Attorney
Deborah Watkins, City Secretary
Craig Kinton, City Auditor
Judge C. Victor Lander, Administrative Judge
Ryan S. Evans, First Assistant City Manager
A.C. Gonzalez, Assistant City Manager
Forest Turner, Assistant City Manager
David Cook, Chief Financial Officer
Jeanne Chipperfield, Director, Budget and Management Services
Edward Scott, Director, Controller's Office
Helena Stevens-Thompson, Assistant to the City Manager – Council Office
Rick Galceran, P.E., Director, Public Works and Transportation
Theresa O'Donnell, Director, Development Services

Taxicab Issues Update: Temporary Modification of Insurance and Age Limit Requirements



Briefing to the Transportation and
Environment Committee

Prepared by
Transportation Regulation Program
Public Works and Transportation
September 15, 2009





Meeting Agenda

- Organization of Taxicab Task Force
- Overview of Work Program – Issue Summary
- Review proposal for a temporary modification of insurance and age limit requirements

Issues Raised by AUTO

- Spokespersons for the Association of United Taxi Operators (AUTO) first addressed the Council on 3-25-2009
- Issues/requests included:
 - Lower insurance requirement to \$50,000 Combined Single Limit (CSL)
 - Increase the age limit of taxicabs from 5 to 8 years
 - Remove the limit on the number of taxicabs that can be authorized in Dallas
 - Investigate the “monopolistic practices” of Yellow Cab
 - Ensure equal enforcement of City ordinances regarding different for-hire transportation services

Ongoing Taxicab Initiatives

- Development of a regional regulation approach for taxicabs and other for-hire transportation services
- Conversion of taxicab fleet to “clean
“low emission” vehicles
- Implementation of a taxicab limit at DFW International Airport
- Improvements in the overall quality of taxicabs and service



Economic Recession

- Economic recession has adversely affected the taxicab business that is largely dependent on the hospitality industry
 - Airport passengers down
 - Airport taxicab dispatches down
 - Hotel occupancy down

Airport Passengers

DFW International Airport and Love Field

Time Period	Average Annual Passengers	Percentage Change
1999-2000	67,349,298	-12.92%
September 11, 2001		
2002-2003	58,646,820	
2006-2007	67,418,847	-12.46%
Current Economic Recession		
2009	59,019,587*	

*Straight line estimate for 2009

Airport Taxicab Dispatches

Time Period	Average Annual Dispatches	Percentage Change
1999-2000	980,710	-34.7%
September 11, 2001		
2002-2003	640,012	
2006-2007	758,112	-26.6%
Current Economic Recession		
2009	556,328*	

*Straight line estimate for 2009

Hotel Occupancy

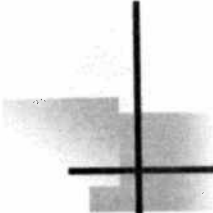
Time Period	Average Occupancy	Percentage Change
1999-2000	66.5%	-11.6%
September 11, 2001		
2002-2003	54.9%	
2006-2007	66.5%	-8.5%
Current Economic Recession		
2009	58.0%*	

*Partial year rate for 2009



Taxicab Task Force

- Policy Group
 - The Policy Group meets as needed to provide feedback to the Working Group and determine when recommendations are ready to be carried forward to decision-makers at their respective agencies.
- Work Group
 - The Working Group meets to debate the issues, develop supporting information and work to achieve consensus on recommendations. It is anticipated that the Working Group will meet twice a month. Recommendations from the Working Group will be presented to the Policy Group as they are developed.



Participants – Policy Group

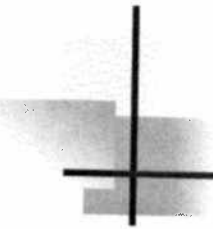
- City of Dallas
 - Sheffie Kadane – Chair (Councilmember)
 - Tennell Atkins – Vice Chair (Councilmember)
- City of Fort Worth
 - Jungus Jordan (Councilmember)
 - Joel Burns (Councilmember)
- DFW International Airport
 - Bernice Washington (Board Representative)
 - Jim Crites (Executive Vice President for Airport Operations)
- North Central Texas Council of Governments
 - Michael Morris (Director of Transportation)

Participants – Working Group

- Taxicab Industry Representatives (17)
 - Dallas/Fort Worth Companies (13)
 - Non-Dallas/Fort Worth Companies (1)
 - Association of United Taxi Operators - AUTO (3)
- Hospitality Industry (2)
 - Brooke Dieterlen (Hotel Association)
 - Casandra Matej (Convention and Visitors Bureau)
- City of Dallas (2)
 - John Brunk (Assistant Director)
 - Gary Titlow (Program Manager)
- City of Fort Worth (2)
 - Mike Robinson (Business Manager)
 - Gerald Taylor (Ground Transportation Coordinator)
- DFW International Airport (2)
 - Jeff Clevenger (Senior Ground Transportation Manager)
 - David Galloway (Ground Transportation Regulatory Manager)
- North Central Texas Council of Governments (2)
 - Michelle Bloomer (Program Manager)
 - Jesse Huddleston (Transportation Planner)

Work Program - Categories

- Taxicab Quality
- Service Quality
- Air Quality
- Regionalization
- Other Issues



Taxicab Quality

Work Program Issue Summary

- Age limit
- Replacement vehicles
 - Age of vehicle when put on stand
 - Salvage title vehicles
- Inspections
 - Safety
 - Vehicle condition



Service Quality

Work Program Issue Summary

- Insurance
- Secure credit card transactions
- Driver training – customer service
- GPS tracking
- Computerized dispatch and record keeping
- Cameras
- Vehicle size
- ADA vehicles



Air Quality

Work Program Issue Summary

- Conversion of taxicab fleets to “clean” low emission vehicles
- Reduction in deadheading to and from DFW Airport
- GPS tracking and computerized dispatch to efficiently dispatch taxicabs



Regionalization

Work Program Issue Summary

- Consolidation of regulatory responsibility in the region through Dallas, Fort Worth and DFW Airport under a common set of requirements providing one-stop permitting and inspection
- Strategy to implement access limitation at DFW Airport
- Methodology to determine number of taxicabs needed to serve a regional market – procedure to approve market access / open the Dallas market

Other Issues

Work Program Issue Summary

- Review of regulation and enforcement of taxicabs relative to other for-hire transportation services
- “Monopolistic practices” of Yellow Cab
- Responsibilities of taxicab companies
- Review of taxicab rates of fare

Temporary Modification: Insurance and Age Limit

- City of Dallas staff briefed the Council Transportation and Environment Committee on a proposal for a temporary modification of insurance and age limit requirements on 6/8/2009
- The Committee asked staff to brief the Task Force on this proposal and return to the Committee within 90 days

Insurance – History

City of Dallas

- Prior to 1991 – \$500,000 Combined Single Limit (CSL)
- 1991 – Reduced to \$300,000 CSL – taxicab company request to increase number of insurance carriers willing to provide coverage for taxicabs
- 1996 – Increased to \$500,000 CSL – DFW Airport regulation operation transferred from City to DFW Airport – Airport had \$500,000 CSL
- 2003 – Reduced to \$100,000 CSL for six months – taxicab company request to increase number of insurance carriers willing to provide coverage for taxicabs
- Current – \$500,000 CSL



Insurance Proposal

- Reduce minimum liability insurance requirement for taxicabs from \$500,000 CSL to \$100,000 CSL for a period of one year effective upon approval

Minimum Liability Insurance Texas Cities

City	Liability Insurance
Dallas-Fort Worth	\$500,000 CSL
Austin	\$100,000/\$300,000/\$25,000
Houston	\$25,000/\$50,000/\$25,000
San Antonio	\$25,000/\$50,000/\$25,000
El Paso	\$25,000/\$50,000/\$25,000

CSL stands for Combined Single Limits, the maximum that will be paid out for any one accident for liability and/or property damage. A \$25,000/\$50,000/\$25,000 insurance requirement stands for limiting the insurance liability to \$25,000 for any one person or \$50,000 for all people in any one accident, and \$25,000 for property damage.

Minimum Liability Insurance Top 20 Most Populous Cities

City (Rank)	Liability Insurance
Dallas (9) – Fort Worth (19)	\$500,000 CSL
San Francisco (14)	\$500,000 CSL
Los Angeles (2)	\$350,000 CSL or \$100,000/\$300,000/\$50,000
Chicago (3)	\$350,000 CSL
New York (1)	\$300,000 CSL
San Diego (8)	\$300,000 CSL
Detroit (11)	\$300,000 CSL
Jacksonville (13)	\$300,000 or \$125,000/\$250,000/\$50,000
Austin (16)	\$100,000/\$300,000/\$25,000
Indianapolis (12)	\$100,000 CSL
Columbus (15)	\$100,000 CSL
Memphis (17)	\$50,000 CSL or \$20,000/\$40,000/\$10,000
Charlotte (20)	\$30,000/\$60,000/\$25,000
Houston (4)	\$25,000/\$50,000/\$25,000
San Antonio (7)	\$25,000/\$50,000/\$25,000
Baltimore (18)	\$25,000/\$50,000/\$15,000
Philadelphia (5)	\$15,000/\$30,000/\$5,000
Phoenix (6)	\$15,000/\$30,000/\$10,000
San Jose (10)	\$15,000/\$30,000/\$5,000

Claim History

Sample of Small Companies

Company (Number of Taxicabs)	Time Period	Number of Claims	Average Loss per Claim
Alamo (60)	2005-06	2	\$5,695
	2006-07	4	\$2,925
	2007-08	4	\$3,551
	2008-09	4	\$0
Ambassador (193)	2005-06	19	\$4,323
	2006-07	28	\$3,119
	2007-08	27	\$3,738
	2008-09	17	\$31,455
Star (87)	2005-06	20	\$3,677
	2006-07	22	\$6,343
	2007-08	21	\$2,590
	2008-09	10	\$2,585



Potential Savings

- Information on potential savings associated with lower insurance requirements were submitted by Cowboy/Ranger, Executive Group, Yellow Cab, and Fort Worth staff
- Estimates do not take into account the impact of varying deductibles or discounts associated with larger fleets

Potential Savings

Percentage premium reduction associated with lowering liability insurance requirement from \$500,000 CSL

	Cowboy-Ranger	Executive Group	Yellow Cab	Fort Worth
\$500,000 CSL lowered to \$300,000 CSL	-7.5%	-5%	-9.3%	-9.3%
\$500,000 CSL lowered to \$100,000 CSL	-28.9%	-10%	-28.6%	-28.6%

Potential Savings

Annual savings for various premiums and fleet sizes

	50 cab fleet	100 cab fleet	150 cab fleet	200 cab fleet
Annual Premium/Car	Reduction from \$500,000 CSL to \$300,000 CSL (-9.3%)			
\$2000	\$9,300	\$18,600	\$27,900	\$37,200
\$2500	\$11,625	\$23,250	\$34,875	\$46,500
\$3000	\$13,950	\$27,900	\$41,850	\$55,800
Annual Premium/Car	Reduction from \$500,000 CSL to \$100,000 CSL (-28.6%)			
\$2000	\$28,600	\$57,200	\$85,800	\$114,400
\$2500	\$35,750	\$71,500	\$107,250	\$143,000
\$3000	\$42,900	\$85,800	\$128,700	\$171,600

Premiums shown are for illustration purposes and do not take into account the impact of varying deductibles or other discounts (e.g., based on fleet size) would have on premiums.

Potential Savings

Savings per taxicab for various premiums

	Daily Savings/Taxicab	Annual Savings/Taxicab
Annual Premium/Car	Reduction from \$500,000 CSL to \$300,000 CSL (-9.3%)	
\$2000	\$0.62	\$186
\$2500	\$0.78	\$233
\$3000	\$0.93	\$279
Annual Premium/Car	Reduction from \$500,000 CSL to \$100,000 CSL (-28.6%)	
\$2000	\$1.91	\$572
\$2500	\$2.38	\$715
\$3000	\$2.86	\$858

Assumes drivers working six days a week for fifty weeks a year.

Pros

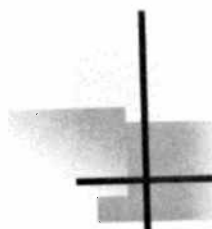
Lower the insurance requirement

- Dallas' insurance requirement is at the high end among both Texas cities and nationally indicating that some risk associated with a lower insurance requirement can be tolerated in the marketplace
- Insurance costs are a significant part of a small company's cost structure – reducing minimum liability requirement provides some immediate relief in a depressed economy
- It tests the insurance market to see if additional insurance companies will enter the market to provide additional competition and to see how much insurance premiums can be lowered – this could reveal how much capital could be freed up for taxicab companies to invest in improved service
- Some companies will choose to maintain higher insurance levels so that the risk to the general public from lowering the mandated amount is lessened

Cons

Don't lower the insurance requirement

- The \$500,000 CSL limit is needed to protect the general public in the event of a significant accident
- Accident claims periodically exceed the proposed \$100,000 CSL and occasionally meet or exceed the current \$500,000 CSL – any savings could be wiped out by one or two large claims
- Savings associated with lower insurance requirements are not significant enough to risk the loss of protection – any savings will be returned to the drivers via lower stand fees instead of invested to improve the business
- Current insurance and age limit requirements were already in place when most of these companies went into business
- Reducing insurance requirements lowers quality standards and puts the region in a reactive instead of a proactive approach to maintaining quality – this is the wrong position to be in as we approach the Super Bowl in 2011



Age Limit - Purpose

- Age limit is a measure used in combination with inspections to help ensure the quality of vehicles that are licensed for use as taxicabs
- Current regulations establish the age limit of taxicabs at 5 years (7 years for low emission vehicles)

Age Limit – History

City of Dallas

- 1976 – 5 year age limit rule adopted
- 1979 – exception allowed for vehicle in exceptional condition
- 1984 – age limit changed to 8 years
- 1985 – age limit changed back to 5 years
- 1992 – cabs on stand were grandfathered
- 1996 – schedule to remove cabs older than 5 years
- 1996 – alternative fuel cabs allowed 2 extra years
- 1997 – all cabs older than 5 years removed from fleet
- 2002 – one year extension approved for all vehicles on fleet in response to economic impact of 9/11

Age Limit Proposal

- Provide a one year extension from five years to six years for all vehicles on the taxicab fleet effective upon approval

Note: The age limit modification is time sensitive because owners whose vehicles are scheduled to be removed from the taxicab fleet at the end of the year need time to make decisions on purchasing new vehicles

Maximum Age Limit Texas Cities

City	Age Limit
El Paso	9 years
Austin	8 years / 10 years for "accessible" taxicab
San Antonio	8 years / 7 years for "airport" taxicab
Houston	6 years
Dallas-Fort Worth	5 years / 7 years for "clean" taxicab

Maximum Age Limit

Top 20 Most Populous Cities

City (Rank)	Age Limit
San Diego (8)	None
Detroit (11)	None
Jacksonville (13)	None
Columbus (15)	None
Memphis (17)	None (proposal going to council July 2009 for 10 year age limit)
San Jose (10)	10 years or 400,000 miles
Indianapolis (12)	10 years
Baltimore (18)	10 years
Charlotte (20)	10 years
Los Angeles (2)	9 years / 10 years for "accessible" taxicab
Philadelphia (5)	8 years or \$250,000 miles
San Antonio (7)	8 years / 7 years for "airport" taxicab
San Francisco (14)	8 years or 350,000 miles (on 1-1-10 > 7 years and on 1-1-11 > 6 years)
Austin (16)	8 years / 10 years for "accessible" taxicab
Houston (4)	6 years
Phoenix (6)	6 years
New York (1)	5 years / 7 years for "clean" taxicab
Chicago (3)	5 years / Option for 1 year extension
Dallas (9) – Fort Worth (19)	5 years / 7 years for "clean" taxicab

Age of Dallas Taxicabs

Company	Number of Taxicabs	Model Year 2009	Model Year 2008	Model Year 2007	Model Year 2006	Model Year 2005	Average Age
Alamo	44	0	1	10	12	21	4.2
Ambassador	122	0	6	32	37	47	4.0
Cowboy	154	0	9	27	49	69	4.2
Eagle	45	1	0	8	10	26	4.3
Executive	184	0	7	38	53	86	4.2
Freedom	41	0	0	8	13	20	4.3
Golden	63	0	4	12	27	20	4.0
Jet	72	0	3	26	20	23	3.9
Ranger	91	1	3	19	26	42	4.2
Star	86	1	5	15	32	33	4.1
State	30	0	0	6	15	9	4.1
Taxi Dallas	99	0	2	21	43	33	4.1
Yellow	798	16	28	227	230	297	4.0
Total	1829	19	68	449	567	726	4.1

Pros

Raise the age limit

- An age limit extension will help taxicab owners get through a period when credit markets are tight making it difficult to obtain loans for new taxicabs
- Dallas Council action after 9/11/01 indicated a policy recognition that economic recession puts a hardship on taxicab companies and drivers
- One year extension in 2002 did not result in any measureable increase in complaints about taxicab quality
- Current City Code provides for a 7 year age limit for low emission vehicles indicating some level of acceptance for the quality of vehicles over 5 years

Cons

Don't raise the age limit

- Adoption and enforcement of the five year age limit has been instrumental in improving the overall quality of taxicabs in the region
- Older vehicles increase the risk of mechanical breakdown that could put the public and drivers at greater risk
- Increasing the age limit requirement lowers quality standards and puts the region in a reactive instead of a proactive approach to maintaining quality – this is the wrong position to be in as we approach the Super Bowl in 2011

Consensus?

Task Force Working Group

- Based on discussion at the 7/30/09 and 8/27/09 meetings there is not a consensus position among task force members
- Taxicab industry representatives (companies and drivers) were split approximately 50/50 with larger companies and their affiliated companies supporting existing levels and smaller independent companies and driver representatives supporting the proposed changes
- Hospitality industry representatives sent letters after the 8/27/09 meeting supporting existing insurance and age limit standards

Consensus?

Task Force Policy Group

- Policy Group met on 8/31/09 to review the work plan and proposals for insurance and age limit modifications
- Policy Group did not endorse the temporary modifications
- Concerns were expressed that if the City of Dallas unilaterally implemented the temporary modifications that it would be a move away from the regional approach that we have been working toward
- Suggestion was made that if the City of Dallas were to extend the age limit that additional inspections be required

Action Requested

Committee action is requested to either:

- Endorse the proposed temporary modifications to insurance and age limit requirements and send the proposal forward for full Council consideration
- Reject the temporary modifications and request that the Task Force continue to look at insurance and age limit requirements within the context of their Work Program

Attachments

- Group A: Correspondence supporting the temporary modification of the liability and age limit requirements
- Group B: Correspondence objecting to the temporary modification of the liability and age limit requirements (i.e., supporting existing standards)

Group A Correspondence

- Correspondence supporting the temporary modification of the liability and age limit requirements
- City of Dallas Transportation Regulation received a petition signed by approximately 870 taxicab drivers (letter attached)

April 6, 2009

Ms. Linda Koop
District 11
Dallas City Council

Dear Ms. Koop,

Subject: Formation of a Task Force on Taxicab issues as instructed by Dallas
City Council on March 25th 2009

On the March 25th City Council meeting, the Honorable Mayor Leppert, on behalf of the Dallas City Council, instructed that a taskforce be formed to study the issues of the Ground Transportation Industry and bring the findings back to the city council for consideration.

The issues to be studied are the following:

1. **Code Enforcement** – The selective enforcements of Ground Transportation codes of the City of Dallas has become of great concern to the drivers and it is a burning issue that requires a thorough investigation and immediate attention of the Taskforce. While there is a very heavy-handed enforcement of the taxicab codes, other modes of ground transportations are left unchecked. Improprieties in relation to transportation of customers are rampant among Shuttles, Limos and Buses, Hotel Managements, Doormen, Concierge and Supervisors.

Other concerns, but not limited to the following are:

- Reduction plan of Taxicab fleet at DFW Airport. i.e. Overflow problems;
- Airport Dispatchers and Starters soliciting customers for Limos and Shuttles who queue up and wait when they are supposed to pick up their own customers;
- Super Shuttle Employees & Limo drivers serving as doormen soliciting customers at hotels especially at the Sheraton Downtown Hotel;
- Payment for preferential placement of passengers;
- Service on pre-arranged basis, trip manifests;
- Unrestricted mobility of Drivers from one company to another if he/she so desires;
- Testing for renewal of driving permits;
- Shortage of Taxi stands, Metered Parking and No Parking Zone restrictions
 - Shortage of Taxi stands at Office buildings and hotels;
 - Ticketed for parking at metered parking with time on the meter;
 - Going beyond 25 feet while on a Taxi stand;
 - Loading and unloading at no parking zones;
 - Ticketed \$30.00 by parking controllers for stopping in no parking zone, ticketed \$200.00 by City Inspectors for the same offence.

- ✓ **Action: A Taskforce authorized with a subpoena power be formed to investigate the improprieties.**

It is our hope that these issues be addressed and brought before the Council within 30 days. In order to facilitate these urgent matters, we suggest that the taskforce include the following:

- a) Councilman Tennell Atkins
- b) Councilwoman Linda Koop
- c) A DFW Board Member
- d) Assistant City Manager
- e) Assistant City Attorney
- f) Hotel Association – Ms. Brooks
- g) Taxi Association 3 people
- h) Company Representatives – 6 people.

2. **Moratorium** – The moratorium imposed on the Taxicab Industry in 2003 is unfair and has created an undue burden on the smaller taxicab companies while allowing an unfair advantage for the larger taxicab companies like Yellow Cab Company.

✓ **Action: Immediate Lifting of the Moratorium of 2003.**

Lifting the moratorium will enable all taxicab companies, especially the smaller companies to provide better services and employment opportunities.

3. **Independent Investigation** – The purchase of smaller taxicab companies by Yellow Cab Company under the cover of “Management Contract”, and its ownership of 60% of the taxicab industry created unrivaled monopoly that is strangling the smaller taxicab companies. This company illegally bought out nine other companies under the cover “Management Contract”. These companies are now equipped with the Yellow cab Co. computer MDT systems and are run under the same Yellow Cab dispatch center.

- Yellow Cab dropped the Stand Fees of those bought out companies too far below the market rate to destroy and eliminate owner operator small cab companies.
- Currently Yellow Cab represents almost 60% of the taxicab market share in the City of Dallas, while the 2nd largest company represents only 9%. This is apparently against the rules and laws of the free market competition.
- The City of Dallas taxicab Ordinance chapter 45-4.4(I) prohibits taxicab companies from having any interest, whether directly or indirectly in any insurance company. But the insurance giant AIG is one of the shareholders and investors in the Yellow Cab Company among other investors listed under the “North Texas Opportunity Fund”, who also has invested in the Yellow Checker Cab Company of DFW. Please visit www.ntofund.com to see the list of all of the investors.

✓ **Action: An Independent Investigation Should Be Conducted.**

An independent investigation should be conducted to determine the effect of Yellow Cab Company’s monopolistic practices on the taxicab industry, smaller cab companies and a possible violation of anti-trust laws.

4. **Insurance** – According to City of Dallas Taxicab Codes 45-4.4, the Liability Insurance for each occurrence is \$500,000. Most comparable cities have far less requirements than Dallas. For Example, New York requires \$300,000, Chicago \$100,000, Atlanta \$50,000, Houston \$50,000, San Antonio \$50,000, and Austin \$50,000.

✓ **Action: Lower the Liability Insurance Requirement.**

As most of the bigger cities that have more traffic and business such as New York, Chicago and Atlanta all have far less requirements than Dallas, we request that the Insurance Liability requirement in Dallas be lowered to \$50,000 which is what the sister Texas cities listed above are requiring.

5. **Age Limit** – The age limit that was arbitrarily imposed on taxicabs is 5 years, while shuttles have 7 years and Limos have none. Other cities such as Washington DC have 7 years, Boston 10 years, Denver 10 years and cities like Los Angeles, Atlanta and New York have no age limit at all. It is the maintenance and inspection of vehicles that determines the safety and quality of a vehicle not the age. Contrary to speculations, Dallas taxicabs travel a lot less mileage per year than the figures presented to the council in previous studies.

✓ **Action: Increase Taxicab Age Limit To 8 years.**

Considering the recession in the country, the high cost of fuel and the depressed economy that translated into cancellation of conventions and conferences; it is proper and necessary to review and increase the taxicab age limit.

Signed by the coalition of Taxicab Drivers' Associations and Small Cab Companies:

1. Association of United Taxicab Operators
2. Association of Taxicab Operators
3. Alamo Cab Company
4. Ambassador Cab Company
5. Star Cab Company
6. United Cab Services, and
7. Mr. Roy Williams

We highly appreciate your time and kind efforts in helping us with this arduous task.

CC: Mayor Leppert
City Council
City Manager
City Attorney

DALLAS/FORT WORTH METROPOLITAN AREA LICENSED TAXICAB DRIVERS

August 6, 2009

**Mr. Gary W. Titlow, Manager
Transportation Regulation
Public Works & Transportation
Dallas City Hall
Dallas, Texas 75210**

Re: Taxicab Task Force

Dear Mr. Titlow:

We, the undersigned licensed taxicab drivers, have serious concerns over the monopolistic practices of the large taxicab companies and their overwhelming power on the Task Force.

Any reasonable person with knowledge of the taxicab industry can readily understand their ulterior motives for opposing the Dallas City Staff's original recommendations to the Transportation and Environment Committee on June 8, 2009. It is nothing more than an effort to put us out of business and continuing there monopolistic practices and forcing us to operate under their ruthless and barbaric driver treatment, all for their monetary gain. The only reason Yellow Cab is operating nine (9) cab companies, under some, unknown to us, arrangement with the City of Dallas and The Dallas/Fort Worth International Airport is because they could not get the required \$500,000.00 insurance. We would also like to bring to your attention that Yellow Cab is dispatching Yellow Cab telephone request for service to these other cab companies under their control and totally confusing the public.

The taxicab industry and all its drivers are under enormous financial stress and need the immediate and temporary relief as proposed by Dallas City Staff on June 8, 2009. All the other issues such as service quality, technology, insurance, green cabs, age limits, regional regulation, industry efficiency, etc. can be debated and resolved by the Taxicab Task Force during future meetings as mandated by our elected officials and policy makers.

We respectfully request that you move forth with staff's original recommendations on "Insurance" and "Age Limit Extension" immediately so as to give us the financial relief we need to survive these times of economic hardships and frozen credit markets. Don't let these big cab companies with paid political lobbyist put us out of business.

**Sincerely,
Taxicab Drivers Listed – See attached.**

Alamo Cab Inc.
10875 Shady Trail #106
Dallas, TX 75220
(214)688-1999

July 28, 2009

Attn: Taxicab Taxi Force
Attn: Policy Group

To Whom It May Concern:

We are an owner operator cab company. As you may be aware, we are struggling to make a living given the current economic recession. During this recession, the age limit on taxis has been extended by a period of one year. The times now are even worse than after 9-11. We are asking that you would extend the age limit on taxis by one more year.

It is dire that a decision be made regarding this matter as soon as possible. Otherwise, many drivers will be forced to stop driving because they are not able to replace their cars and will not be able to support their families. This will force many of them to turn to the government for assistance which only furthers the economy crisis in the country.

In the past, when the taxi business was booming the majority of taxicabs were driven 40,000-50,000 miles per year. Now, with the business having slowed to a crawl, the majority are only driven 25,000-30,000 miles per year.

We recommend that the 5 year age limit on taxis be revised to 7 years or 350,000 miles. We believe that this will help the drivers and is a more economical solution for the small owner operator cab companies. This revision of the age limit would be in accordance with most other major U.S. cities. The largest two cities New York and Los Angeles have no age limit at all. Dallas is the 9th ranked city in terms of population, so we question the legitimacy of the 5 year age limit.

For example, if a driver was able to purchase a 2005 vehicle with only 20,000 miles a totally dependable taxi would have to come off of the stand at the end of 2009 with only 30,000 miles on it. In all fairness it does not seem wise to take this vehicle off of the stand. This is why we say the emphasis should be placed on mileage instead of years.

Humbly Submitted,

Tesfai Sbahtu
Alamo Cab Inc.



Group B Correspondence

- Correspondence objecting to the temporary modification of the liability and age limit requirements (i.e., supporting existing standards)



August 27, 2009

Mr. John C. Brunk, P.E.
Assistant Director
City of Dallas Transportation Planning
Dallas City Hall
Dallas, Texas 75201

Dear Mr. Brunk:

Our organization has been pleased to serve on the Regional Taxicab Task Force.

As the meetings and deliberations continue, we wanted to commit in writing our concerns regarding retreating from the long sought after improvements to taxicab regulations that have improved both the quality and service provided by the industry in the DFW Metroplex.

As you know, the NBA All Star Game as well as Super Bowl XLV will be coming to the North Texas region soon. We must ensure, with so much national exposure, that we're putting our best foot forward and not placing the traveling public at risk. It appears that the task force is seriously considering a retreat, not only on ensuring quality cabs by allowing an extension of the 5 year age limit, but also on protecting the public by reducing reasonable insurance requirement levels. Changing these requirements are both detrimental and unacceptable.

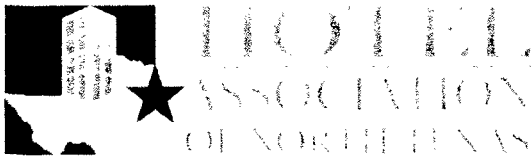
We appreciate and support the goals of improving taxicab service and taxicab quality. We will continue to work for improvements as the task force continues. We would be troubled by any decision that would negatively impact the visitors' experience.

Sincerely,

A handwritten signature in black ink that reads "Casandra Matej". The signature is written in a cursive, flowing style.

Casandra B. Matej
Sr. Vice President, Sales & Services

cc: Phillip Jones, President & CEO, Dallas Convention & Visitors Bureau



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The Adolphus Hotel

August 28, 2009

Mr. John C. Brunk, P.E.
Assistant Director
City of Dallas Transportation Planning
Dallas City Hall
Dallas, Texas 75201

Dear Mr. Brunk:

Our organization has been pleased to serve on the Regional Taxicab Task Force.

As the meetings and deliberations continue, we wanted to again commit to writing our concerns over retreating from the long sought after improvements to taxicab regulations that have improved both the quality and service provided by the industry in the DFW Metroplex.

As you know, the NBA All Star Game as well as Super Bowl XLV will be coming to the North Texas region soon. We must insure, with so much national exposure, that we're putting our best foot forward and not placing the traveling public at risk. It appears that the task force is seriously considering a retreat, not only on ensuring quality cabs by allowing an extension of the 5 year age limit, but also on protecting the public by reducing reasonable insurance requirement levels. Changing these requirements is both detrimental and unacceptable. After listening to both sides of the quality issues, it was made clear reducing insurance to only \$100,000 would only save the drivers less than two dollars a day. This is not the solution to the driver needs. It was also discussed studies commissioned by Dallas, Fort Worth and DFW Airport all indicated the over supply of cabs is what is hurting the drivers income. It would seem logical to fix the problem the experts discussed to generate more daily income for the drivers and not reduce quality standards to save the drivers two dollars a day.

We appreciate and support the goals of improving taxicab service and taxicab quality. We will continue to work for improvements as the task force continues. We are, however, troubled by the discussions of reducing quality standards and consumer protections. As such, please consider this our formal notice of opposition to these suggested retreats in taxicab standards.

Sincerely,

Brooke Dieterlen
Executive Director
Hotel Association of North Texas



JUN 04 2009

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June 2, 2009

Mr. John C. Brunk, P.E.

Assistant Director

City of Dallas Transportation Planning

Dallas City Hall

Dallas, Texas 75201

Dear Mr. Brunk:

I am writing in regard to the Regional Taxicab Task Force that is being organized by the City of Dallas.

As you and others embark on this task, I wanted to express the initial concerns of the Stemmons Corridor Business Association (SCBA) as they relate to the Task Force's charges and agenda items.

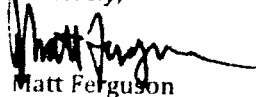
The issues surrounding taxicab regulations and operations have been repeatedly studied in-depth in recent years by the Cities of Dallas and Fort Worth, as well as by DFW International Airport. These studies have led to many positive improvements in taxicab service and quality. While each of these studies found a variety of shared concerns among the individual governmental entities, the most predominate finding in each was that there is a surplus of taxicab supply versus the needed demand. In each case this has led to the respective governmental entities capping the number of taxicabs authorized to operate in their jurisdiction. These caps must remain in place, or even potentially be further reduced, if we are to continue to see a healthy and viable taxicab industry.

SCBA is also very concerned about any potential reduction of quality standards and public and consumer protections that have been achieved by all three governmental entities through the current five-year age limits on vehicles as well as uniformly adopted minimum insurance requirements. Under no circumstances do we see any positive position to reduce the age limit temporarily or permanently. Regarding the insurance, it is our understanding that over the last 20 years taxicab insurance requirements have never been upgraded; only downgraded. These are basic quality standards and consumer protections that must remain in place and/or be increased.

Once the Task Force is finally created and deliberations begin we look forward to sharing with you our concerns and proposals for other related issues such as: defining both quality of taxicabs and quality of taxicab service; transitioning to "clean" vehicles; and implementation of regional regulation strategies. From the outset, however, we feel that it is vitally important to share our concern about retreating from current standards either temporarily or long-term. We, the Stemmons Corridor Business Association, will oppose any compromise in the standards that have brought these improvements to bear.

We appreciate your consideration, and look forward to working with you on this endeavor.

Sincerely,



Matt Ferguson

Chairman, Stemmons Corridor Business Association

c: Dallas City Council
Jeff Finkel, Yellow Cab



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July 20, 2009

Mr. John C. Brunk, P.E.
Assistant Director
City of Dallas Transportation Planning
Dallas City Hall
Dallas, Texas 75201

Dear Mr. Brunk:

I am writing in regard to the Regional Taxicab Task Force that is being organized by the City of Dallas.

The Oak Cliff Chamber of Commerce, by a vote of its Board of Directors, has determined that any lowering or relaxing of standards that regulate the quality of the taxi industry would be detrimental to the economic interests of this entire region, and consequently that of Oak Cliff. Additionally, there are some very real safety concerns that arise any time we lower our standards.

Let us explain.

Much of the economy of the City of Dallas is related to the hospitality industry. With the construction of the new convention center hotel, it is our hope that this industry increases its economic impact on the region. It cannot do so if there is a lessening of standards in the taxi industry.

Taxis are often the first face and impression that a visitor to this region has of the area. As you know, that first impression is extremely important. Our current taxi standards regarding the maximum age of a cab to be no more than five years old were enacted to ensure that the quality of vehicle that transports visitors and regional residents, alike, is both safe and in good repair. Relaxing the age limit to allow older vehicles is not in our best interest.

Regarding the insurance, it is our understanding that over the last 20 years taxicab insurance requirements have never been upgraded; only downgraded. These are basic quality standards and consumer protections that must remain in place.

We, the Oak Cliff Chamber of Commerce, will oppose any compromise in the standards of taxi age or the insurance limits.

Sincerely,

Bob Stimson

President

August 20, 2009

Mr. Gary Titlow
City of Dallas Transportation Planning
Dallas City Hall
Dallas, Texas 75201

Dear Gary:

This letter reiterates our position and the results expected from a proposed insurance requirement reduction.

In each year going back as far as 2002, Yellow Cab or affiliated companies have experienced at least one insurance claim that far exceeded \$100,000. Most years there have been multiple insurance claims that far exceeded \$100,000. In that time frame, numerous insurance claims have even met the \$500,000 minimum limit.

Lowering the City of Dallas' current \$500,000 minimum insurance requirement will not only take Dallas out of the current regionally adopted standard, but place the public and taxicab operating companies at significant risk. The public will be put at risk by not being able to recoup out-of-pocket damages resulting from accidents that occur with taxicabs that exceed \$100,000 (of which there will be multiple per year). Operating companies will be put at risk because they will have to either use cash reserves to pay for the balance in resulting damages or be put out of business.

For example, use the case of an accident involving a \$50K vehicle and 3 passengers (which is very common running around DFW). The taxicab hits this vehicle and is clearly at fault. The vehicle is totaled and all 3 people are injured. Immediately, the \$100,000 limit is reduced to \$50K as that is what it will cost to replace the vehicle. Then there is \$50K left to cover the 3 passengers. The remaining \$50K would have no chance of covering even a fraction of attorney fees, plus medical, plus any other damages awarded. The city would be putting the public at great risk if liability limits are lowered to this irresponsible level.

The chart below outlines costs Yellow Cab was quoted for limits of insurance with no deductible or schedule credits.

Coverage Limit	Premium at increased limit
\$100,000	\$1,565
\$150,000	\$1,706
\$200,000	\$1,815
\$250,000	\$1,909
\$300,000	\$1,987
\$350,000	\$2,050
\$500,000	\$2,191

This chart makes plain that a reduction in the insurance requirement from \$500,000 to \$100,000 would equal a savings in premium costs of \$626.00 per year. Viewed another way that equates to a savings of \$1.72 a day.

Under the lower limit, if an accident occurs (and many will) in which there are damages of \$150,000, the operating company is going to be responsible for paying the \$50,000 balance. That amount far exceeds the minimal costs incurred to maintain a higher and reasonable coverage limit.

Sincerely,

Jack Bewley



Executive Taxi



Golden Cab



TAXI DALLAS

August 24, 2009

Mr. Gary Titlow
Public Works and Transportation
Transportation Regulation Division
Dallas City Hall Room 2BS
Dallas, Texas 75201

Dear Mr. Titlow,

Please accept this correspondence in regards to the Regional Taxicab Task Force. Executive Taxi respectfully submits the following recommendations with regards to the current proposal to change the insurance requirement for taxicabs operating in the City of Dallas. Both representatives from Golden Cab and Taxi Dallas have reviewed these recommendations and are in agreement with them.

The proposal being considered is a reduction of the minimum liability insurance requirement for taxicabs from \$500,000 CSL to \$100,000 CSL for a period of one year effective upon Council approval. Executive Taxi submits the following reasons as to why a reduction should not be approved and Golden Cab and Taxi Dallas agree and concur with the reasons.

The proposal being considered includes the minimum liability insurance from other Texas cities and states that Dallas is at the high end among Texas cities. What is not included in the proposal is that some of these other cities have additional insurance requirements that Dallas does not currently have in place. (i.e. Austin requires Personal Injury Protection (PIP) in the amount of \$2,500 per passenger in addition to the \$100,000/\$300,000/\$25,000)

We feel that the task force must be careful when comparing Dallas to other cities and to take into consideration all aspects of these other cities taxi regulation, if a recommendation based on these other cities is to be presented to the Dallas City Council.

The current requirement of \$500,000 CSL should be maintained and should not be lowered. The primary reason that the City of Dallas has this requirement is for public safety. In the discussions that took place at the last Task Force meeting, we heard a lot of talking by various members of the Task Force, yet no one emphasized this point clearly.

Above everything else, including any economic relief to taxicab companies and taxicab drivers, public safety must come first. The current requirement of \$500,000 CSL ensures that the general public and our passengers are protected in the event of an accident. The public safety first rationale must be preserved throughout any discussions about changing the regulation in the taxicab industry.

The majority of the taxicabs that operate in the City of Dallas are vans, which can be occupied by 6-7 people. In 2003, an accident where all people inside the vehicle are



Executive Taxi



Golden Cab



TAXI DALLAS

injured from an accident, the average medical cost could be between \$6,000-\$9,000 per person, and totally \$42,000-\$63,000.¹ This number does not include property damage, pain and suffering, loss of wages, mental or emotional stress, or court costs. As we all know, the cost of healthcare has increased and the average accident now costs an average of \$12,000-\$15,000 per person, which would total \$72,000-\$105,000 again not including property damage, pain and suffering, loss of wages, mental or emotional stress, or court costs. This clearly would place it above the proposed \$100,000 CSL.

Our companies have seen a steady increase in the amount of healthcare claims from minor accidents. In the past a minor bumper accident whose property damage is less than \$1,000 would result in no injury claim being submitted. We are now seeing injury claims above and beyond \$10,000 from these same small accidents. The cost of investigating and defending from these frivolous claims has also increased. The protection provided from a \$500,000 CSL policy ensures that coverage exists for both minor and major accidents.

In addition to the healthcare costs and property damage considerations, there is also the concern over loss of life. The loss of a person's life as a result of an accident is extremely traffic and will cause a lawsuit to be filed against the driver, the owner of the vehicle, the taxicab company, and quite possibly the City of Dallas. It would be nearly impossible to put the price on an individual's life, however, maintaining the insurance coverage at \$500,000 CSL will provide some assurance that some compensation would be provided. Lowering the insurance coverage would place a taxicab company and driver in financial jeopardy and could open up the City of Dallas to exposure and liability for changing the coverage's.

According to the Fatality Analysis Reporting System², for the past decade, the State of Texas has consistently been the state with the second largest number of accident fatalities. On average, Texas has over 3,000 accident fatalities each year. This number stresses the importance of having adequate insurance coverage to protect the taxicab driver, taxicab companies, and City of Dallas. It is a given fact that the longer a person drives on the road the more likely they are to have an accident and every accident has a risk of becoming a fatality.

Throughout the past few years, our companies have seen multiple claims that exceed a \$100,000 CSL threshold. In fact, we have seen several that could meet and exceed a \$500,000 CSL coverage limit. Throughout all of these claims, our companies have had peace of mind because we maintained a \$500,000 CSL insurance policy.

We must also look at the financial structure of the taxicab companies to see if they could survive a judgment beyond the insurance coverage. Obtaining the current \$500,000 CSL is not an easy task. Insurance companies and their re-insurers want to look at a taxicab companies financial statements for the past five years, their driver's lists, the vehicle lists,

¹ Esurance Website, <http://www.esurance.com/Welcome/home/insurance/cost.aspx>

² Fatality Analysis Reporting System Website, <http://www-fars.nhtsa.dot.gov/States/StatesCrashesAndAllVictims.aspx>



Executive Taxi



Golden Cab



TAXI DALLAS

and lastly their loss runs from the past three years. Insurance companies request this information to ensure that the taxicab company is solid and can afford the insurance premiums and deductibles. Lowering the insurance coverage would allow some of the safeguards in place to ensure financial stability to be waived or ignored completely.

Reducing the insurance requirement should not be considered at this time. The City of Dallas and the region will be experiencing higher than normal traffic as we approach upcoming high profile events such as the Super Bowl. We should maintain and be proud of the high \$500,000 CSL limit we have because it protects the general public and demonstrates that the general public comes first.

In conclusion, we feel that the insurance coverage should not be lowered because the savings associated with lowering the coverage is so minimal that it does not translate to significant savings. According to our insurance agent, the savings associated with lowering the insurance coverage from \$500,000 CSL to \$300,000 CSL is 5%. The savings associated with lowering the insurance coverage from \$500,000 CSL to \$100,000 CSL is 10%.

A savings of 10% is not worth the risk to the General Public, the City of Dallas, taxicab drivers, or taxicab companies. However, the benefits of maintaining the coverage at current levels are well worth the price.

Sincerely,


Allen Mansourian

June 23, 2009

JUN 24 2009

Mr. John C. Brunk, P.E.
Assistant Director
City of Dallas Transportation Planning
Dallas City Hall
Dallas, Texas 75201

Dear Mr. Brunk:

I am writing regarding the Regional Taxicab Task Force that is being organized by the City of Dallas.

As you and others embark to form a Regional Taxicab Task Force, I wanted to express our organization's initial concerns as they relate to the Task Force's charges and agenda items.

The issues surrounding taxicab regulations and operations have been studied in-depth in recent years by the Cities of Dallas and Fort Worth, as well as by DFW International Airport. The studies have led to many positive improvements in taxicab service and quality in the entire region. The Arlington Convention & Visitors Bureau will oppose any retreat in the standards that have brought these improvements to bear and will encourage our city to not follow your example in this effort.

The result of these studies is that there is a surplus of taxicab supply versus the needed demand. This has led to the respective governmental entities capping the number of taxicabs authorized to operate in their jurisdiction. These caps must remain in place, and possibly further reduced, if we are to continue to see not only a healthy and viable taxicab industry, but also to continue the much needed improvements in taxicab quality and service.

Our organization is also very concerned about any potential retreat on quality standards and public and consumer protections that have been achieved by all three governmental entities through the current five-year age limits on vehicles as well as uniformly adopted minimum insurance requirements. These are basic quality standards and consumer protections that must remain in place and/or be increased. The Arlington Convention & Visitors Bureau opposes any retreat in these standards for our city and the region.

Once the Task Force is created and deliberations begin we look forward to sharing with you our concerns and proposals for other related issues such as: defining both quality of taxicabs and quality of taxicab service; transitioning to "clean" vehicles; and implementation of regional regulation strategies.

We appreciate your consideration, and look forward to working with you on this endeavor.

Sincerely,



Jay Burriss
President & CEO
Arlington Convention & Visitors Bureau

DALLAS REGIONAL CHAMBER

JUN 26 2009

June 24, 2009

Mr. John C. Brunk, P.E.
Assistant Director
City of Dallas Transportation Planning
Dallas City Hall
Dallas, Texas 75201

Dear Mr. Brunk:

I am writing on behalf of the Dallas Regional Chamber, in regard to the Regional Taxicab Task Force that is being organized by the City of Dallas.

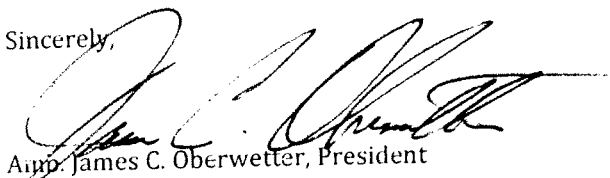
The Cities of Dallas and Fort Worth, as well as DFW International Airport have done an excellent job of investigating taxicab issues in years past and their work has led to many positive improvements in taxicab service and quality. In each study the common finding was a surplus of taxicab supply versus demand. The caps that were put into place due to these findings must remain in place if we are to continue to see much needed improvements in taxicab quality and service.

The Chamber would also like to see quality standards and public and consumer protections preserved. The current five-year age limits on vehicles as well as uniformly adopted minimum insurance requirements are basic quality standards and consumer protections that must remain in place and/or be increased.

The Dallas Regional Chamber also has concerns about air quality issues arising from increasing vehicle age limits. It is imperative for the North Texas region to continue the successful reduction of NOx emissions from older high emitting vehicles.

We appreciate your consideration, and look forward to working with you on this endeavor.

Sincerely,



Atty. James C. Oberwetter, President
Dallas Regional Chamber

cc: Mayor Tom Leppert and Dallas City Council



Irving Convention and Visitors Bureau
222 W. Las Colinas Blvd., Suite 1550
Irving, Texas 75039
www.irvingtexas.com

June 25, 2009

Mr. John C. Brunk, P.E.
City of Dallas
Assistant Director – Transportation Planning
Dallas City Hall
Dallas, TX 75201

Dear Mr. Brunk:

I am writing regarding the Regional Taxicab Task Force that is being organized by the City of Dallas.

As the Regional Taxicab Task Force is formed, I want to express my organization's initial concerns as they relate to the Task Force's charges and agenda items.

The issues surrounding taxicab regulations and operations have been studied in-depth in recent years by the cities of Dallas and Fort Worth, as well as by DFW International Airport. The studies have led to many positive improvements in taxicab service and quality in the entire region. The Irving Convention and Visitors Bureau will oppose any retreat in the standards that have brought these much needed improvements to bear, and will encourage our city strongly to not follow your example in this effort.

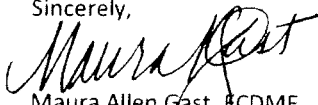
The result of these studies is that there is a surplus of taxicab supply versus the needed demand. This has led to the respective governmental entities capping the number of taxicabs authorized to operate in their respective jurisdictions. These caps must remain in place, and possibly be further reduced, if we are to continue to see a healthy and viable taxicab industry, but also to see the much needed consistent and continued improvements in taxicab quality and service.

The Irving Convention and Visitors Bureau is also very concerned about any potential retreat on quality standards and public and consumer protections that have been achieved by all three governmental entities through the current five-year age limits on vehicles, as well as uniformly adopted minimum insurance requirements. These are basic quality standards and consumer protections that must at a minimum remain in place, or be increased. The Irving Convention and Visitors Bureau opposes any retreat in these standards for our city and the region.

Once the Task Force is created and deliberations begin, we look forward to sharing with you our concerns and proposals for other related issues, including but not limited to: defining both quality of taxicabs, and quality of taxicab service; transitioning to "clean" vehicles; and implementation of regional regulation strategies.

We appreciate your consideration and look forward to working with you on this important customer issue.

Sincerely,


Maura Allen Gast, FCDME
Executive Director





Stephen E. Taylor

President

214.368.6486
staylor@ndcc.org

June 25, 2009

Mr. John C. Brunk, P.E.
Assistant Director
City of Dallas Transportation Planning
Dallas City Hall
1500 Marilla
Dallas, Texas 75201

Dear John:

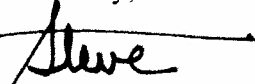
As we've discussed, the work of your Regional Taxicab Task Force will be important to all of us involved in economic development and employment growth. The availability of clean, comfortable and safe taxicab service is one of the key first impressions for visitors and business travelers to North Texas.

With that thought in mind, we respectfully ask that your Task Force members keep at the forefront of your discussions the important cab quality and consumer protections that the City of Dallas has instituted in recent years. The Dallas City Council and its transportation staff have played the key leadership role needed to make these standards apply equally in all the relevant jurisdictions, and our City and the North Texas region have benefitted handsomely as a result.

I know that your Task Force intends to present a comprehensive recommendation to the City Council this September. We would appreciate being included in the regular communications on this matter and would also like the opportunity to comment further as this process unfolds.

Thanks, John.

Sincerely,


Stephen E. Taylor



JUL 10 2009

June 26, 2009

Mr. John C. Brunk, P.E.
City of Dallas
Assistant Director – Transportation Planning
Dallas City Hall
Dallas, Texas 75201

Dear Mr. Brunk:

We are writing regarding the Regional Taxicab Force that is being organized by the City of Dallas.

The issues surrounding the taxicab regulations and operations have been studied in-depth in recent years by the cities of Dallas and Fort Worth, as well as the DFW International Airport. The studies have led to many positive improvements in taxicab quality and service in the entire region. The Grapevine Convention and Visitors Bureau encourages the City of Dallas to not only hold the current standards, but to continue to bring continued improvements to taxicab quality and service.

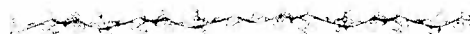
The surplus of taxicab supply versus demand has led to the respective governmental entities capping the number of taxicabs authorized to operate in their respective jurisdictions. We feel these caps should remain in place and possibly be further reduced, if we are to continue to see a healthy and viable taxicab industry.

We are also concerned about any potential retreat on quality standards and public and consumer protections that have been achieved by all three governmental entities through the current five year age limits on vehicles, as well as uniformly adopted minimum insurance requirements. These minimum quality standards are consumer protections and must remain in place.

We appreciate your consideration and look to following the good works of the Regional Taxicab Task Force.

Sincerely,

Paul W. McCallum
Executive Director





*Constructive
Leadership
Since 1926*

Ronald Hay
Chairman

Executive Officers:

Rose Blair
Mark Cooks
Connie Davis
Huelon Harrison
Sonya Hoskins
Michael Johnson
Sharon King
Malcolm Robinson

Reginald Gates
President

JUN 10 2009

June 3, 2009

Mr. John C. Brunk, P.E.
Assistant Director
City of Dallas Transportation Planning
Dallas City Hall
Dallas, Texas 75201

RE: Regional Taxicab Task Force

Dear Mr. Brunk:

I am writing in regard to the Regional Taxicab Task Force that is being organized by the City of Dallas.

As you and others embark on this task, I wanted to express our organization's initial concerns as they relate to the Task Force's charges and agenda items. In addition to this initial letter, our organization would appreciate the opportunity to address the Task Force (either by written communication or in-person testimony) as the need may occur during the task force ongoing deliberations.

The issues surrounding taxicab regulations and operations have been repeatedly studied in-depth in recent years by the Cities of Dallas and Fort Worth, as well as by DFW International Airport. These studies have led to many positive improvements in taxicab service and quality. The Dallas Black Chamber will strongly oppose any retreat in the standards that have brought these improvements to bear.

While each of these studies found a variety of shared concerns among the individual governmental entities, the most predominate finding in each was that there is a surplus of taxicab supply versus the needed demand. In each case this has led to the respective governmental entities capping the number of taxicabs authorized to operate in their jurisdiction. These caps must remain in place, or even potentially be further reduced, to help facilitate a healthy and viable taxicab industry, that continue to make the much needed investments to ensure continuous improvements in taxicab quality and service.

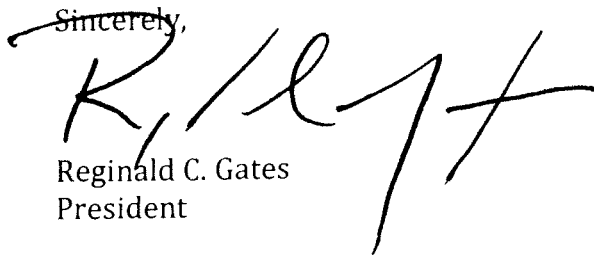
Letter to Mr. John C. Brunk, P.E.
June 3, 2009
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Our organization is also very concerned about any potential retreat on quality standards and public and consumer protections that have been achieved by all three governmental entities through the current five-year age limits on vehicles as well as uniformly adopted minimum insurance requirements. These are basic quality standards and consumer protections that must remain in place and/or be increased. Know that the Dallas Black Chamber strongly oppose any retreat in these standards.

Once the Task Force is finally created and deliberations begin we look forward to sharing with you our concerns and proposals for other related issues such as: defining both quality of taxicabs and quality of taxicab service; transitioning to "clean" vehicles; and implementation of regional regulation strategies. We wanted to share our organization's concern about retreating from current standards either temporarily or long-term during the early stages of the task force formation and deliberations.

We appreciate your consideration and look forward to working with you on this very important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Gates', with a long horizontal stroke extending to the right.

Reginald C. Gates
President

RCG/cjh

cc: Mayor, Councilmembers & City Manager

Chair of the Board
Thelie Silts
Woman Matters Downtown

President/CEO
John F. Crawford
DOWNTOWN DALLAS

Executive Committee

Doug Adams
Dallas Symphony Orchestra

Brian Bergersen
Spectrum Properties

Dan Blizard
A. H. Bee Corporation

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Kristi Shemil Hoyt
Baylor Health Care System

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Forest City Residential, Inc.

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Michael H. Anderson
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Don Dowell
Commerce Bank Tower

Zeretta Drew
Dallas Black Dance Theatre

Kent Eastman
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Hines Investments Limited Partnership

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CB Richard Ellis

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Deborah Ryan
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Pamela Stein
Greenberg Traurig LLP

John J. Stenger
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Gary Thomas
Dallas Area Rapid Transit

Bryan Trubey
HKS, Inc.

Ray Washburne
Charter Holdings

Kirby White
Prescient Real Estate Equities

Paul Whitman
Jones Lang LaSalle, Inc.

DOWNTOWN
DALLAS

JUN 15 2009

June 9, 2009

Mr. John C. Brunk, P.E.
Assistant Director
Public Works and Transportation
City of Dallas
1500 Marilla Street, Room L1BS
Dallas, Texas 75201

Dear Mr. Brunk:

DOWNTOWN DALLAS is the primary advocate, champion and steward for the City's urban center, striving every day to ensure the area becomes an international destination for living, business, entertainment, culture, tourism and investment. It is with this mission in mind that I am writing in regard to the Regional Taxicab Task Force that is being organized by the City of Dallas.

"Transportation" is one of **DOWNTOWN DALLAS'** core program areas. From issues ranging from DART to public parking, it is our goal to ensure patrons of Downtown are able to travel throughout Downtown with ease, efficiency and in a cost effective manner. Taxicab service certainly falls within this realm of doing business.

As the Regional Taxicab Task Force is formed, I would like to take the opportunity to share with you some initial concerns.

The first concern is related to standards for regulations and operations. While it is critical to Downtown development that we provide a business-friendly environment for taxicab operators (thus providing greater service for consumers), the standards currently in place are the result of in-depth study in recent years by Dallas and Fort Worth, as well as DFW airport. They are in place so that we ensure a safe and prosperous environment for all; therefore we oppose any loosening of these standards.

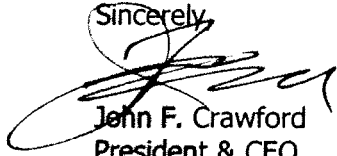
While each of the recent studies found a variety of shared concerns among the individual governmental entities, the most predominate finding in each was that there is a surplus of taxicab supply versus the needed demand. In each case this has led to the respective governmental entities capping the number of taxicabs authorized to operate in their jurisdiction. These caps must remain in place, or even potentially be further reduced, if we are to continue to see not only a healthy and viable taxicab industry, but also to continue the much needed improvements in taxicab quality and service.

Our organization is also very concerned about any potential retreat on quality standards and public and consumer protections that have been achieved by all three governmental entities through the current five-year age limits on vehicles as well as uniformly adopted minimum insurance requirements. These are basic quality standards and consumer protections that must remain in place and/or be increased.

Once the Task Force begins its work, we look forward to sharing with you our concerns and proposals for other related issues such as: defining both quality of taxicabs and quality of taxicab service; transitioning to "clean" vehicles; and new and creative fee structures for the intown area, marketing and other issues that relate specifically to Downtown taxi service.

We appreciate your consideration, and look forward to working with you.

Sincerely,



John F. Crawford
President & CEO
DOWNTOWNDALLAS

cc: Council Member Angela Hunt
Council Member Linda Koop
Council Member Pauline Medrano

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June 24, 2009

Mr. John C. Brunk, P.E.
Assistant Director
Public Works and Transportation
City of Dallas
Dallas City Hall
1500 Marilla Street, Room L1BS
Dallas, TX 75201

Dear Mr. Brunk:

I am writing on behalf of the North Texas Super Bowl XLV Host Committee regarding the Regional Taxicab Task Force that we understand is being organized by the City of Dallas.

Super Bowl XLV will be the biggest and most impactful event in the region's history. The game is expected to attract several hundred thousand people to Dallas and North Texas, many of whom have not been to our city and region before and all of whom will judge us by the quality of hospitality, convenience and professionalism they experience while they are with us. It is in this context that the Host Committee wishes to express its interest in the mission of the Task Force regarding decisions the Task Force might render that might alter the high standards already in place regarding taxicab services for the region.

Super Bowl fans will be staying in hotels and attending events throughout North Texas. The National Football League estimates that sixty-five percent of all travelers coming to Dallas and the region for the game and its other experiences are corporate decision-makers. As such, the Super Bowl provides Dallas and the region with a remarkable marketing opportunity. With this understanding, it's very important that all of us ensure that our guests have a safe and enjoyable experience so that they will desire to return to Dallas and the region in the future for business meetings and leisure travel. Providing high quality and readily available taxicab service will be critical to achieving this objective.

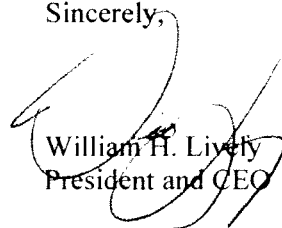
NORTH TEXAS SUPER BOWL XLV HOST COMMITTEE
DALLAS OFFICE 2911 Turtle Creek Boulevard, Suite 1000, Dallas, Texas 75219
FORT WORTH OFFICE 777 Taylor Street, Suite 1124, Fort Worth, Texas 76102
TELEPHONE 214.252.5100 WEBSITE www.northtexassuperbowl.com

The issues surrounding taxicab regulations and operations have been repeatedly studied in recent years by Dallas and Fort Worth as well as DFW International Airport. These studies have led to many positive improvements in taxicab service and quality. The North Texas Super Bowl XLV Host Committee recognizes the impact of these improvements and opposes any retreat, temporary or permanent, in the new standards.

The North Texas Super Bowl XLV Host Committee also strongly endorses no compromise in the quality standards and public consumer protections that have been achieved by all three governmental entities through the implementation of the current five-year age limit on vehicles, as well as, uniformly adopted minimum insurance requirements. These are important quality standards and consumer protections that we believe must remain in place and/or be increased.

Once the regional Taxicab Task Force is activated and begins its discussions, the Host Committee looks forward to meeting with you and the Task Force to engage in an informed discussion of how best to address the opportunity of ensuring that the visitors to Dallas and North Texas for the Super Bowl will have access to high-quality, clean taxicabs and high-quality taxicab services assured by a regional regulation strategy. We appreciate your consideration and we look forward to meeting with the Task Force when it is appointed and activated.

Sincerely,



William H. Lively
President and CEO

c: Tara Green, Vice President and Chief Operating Officer



June 5, 2009

Mr. John C. Brunk, P.E.
Assistant Director
City of Dallas Transportation Planning
Dallas City Hall
Dallas, Texas 75201

Dear Mr. Brunk:

I am writing in regard to the Regional Taxicab Task Force that is being organized by the City of Dallas.

As an industry that is impacted by tourism and travel, we have concerns when decisions are made that might possibly change the high standards already in place regarding taxicab services in our city. Many patrons of restaurants in Dallas and surrounding areas call on taxicabs to make their dining experience more enjoyable and safe; therefore, we want them to have the best experience possible when using these services.

The issues surrounding taxicab regulations and operations have been repeatedly studied in-depth in recent years by the cities of Dallas and Fort Worth, as well as by DFW International Airport. These studies have led to many positive improvements in taxicab service and quality. The Greater Dallas Restaurant Association opposes any retreat, either temporarily or permanently, in the standards that have brought great improvements in this area.

While each of these studies found a variety of shared concerns among the individual governmental entities, the most predominate finding in each was that there is a surplus of taxicab supply versus the needed demand. In each case this has led to the respective governmental entities capping the number of taxicabs authorized to operate in their jurisdiction. It has been suggested that these caps must remain in place, or even potentially be further reduced, if we are to continue to see not only a healthy and viable taxicab industry, but also to continue the much needed improvements in taxicab quality and service. It is also not in the best interest of the traveling public to extend age limits on vehicles and allow for aging fleets. Current limits are suffice and encourage more modern fleets with energy efficient vehicles – an important issue when you think about the air quality in North Texas and the number of taxicabs on the roadways. It is our understanding over the last 20 years taxicab insurance requirements have never been upgraded; only downgraded. Let's stop that trend and protect those standards that are already in place. The standard is achievable and obtainable for reputable businesses and necessary to protect the public.

Once the Task Force is created and discussions begin we look forward to sharing with you our feedback on these issues, as well as issues such as: defining both quality of taxicabs and quality of taxicab service; transitioning to "clean" vehicles; and implementation of regional regulation strategies.

We appreciate your consideration, and look forward to working with you on this endeavor.

Sincerely,

Jamee Green
Executive Director, Greater Dallas Restaurant Association

Cc: The Honorable Tom Leppert
Councilman Jerry Allen
Councilman Tennell Atkins
Deputy Mayor Pro Tem, Dewaine Caraway
Councilwoman Carolyn Davis
Mayor Pro Tem, Elba Garcia
Councilwoman Vonciel Jones Hill
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Councilman Steve Salazar