

John Bliss

July 13, 2020.

Your Worships:

For the record I am the managing editor of [The Taxi Tribune](#) and own shares in ProCabby, a technology company based in Ottawa, Ontario.

I have completed a review of the LTS report to the Standing Policy Committee on Community and Protective Services of July 10, 2020 and would ask council to consider the following ideas:

a: redefine the current TPLs to fleet licences which allows the holder of such licences to operate as many vehicles as he wishes using subsidiary licenses attached to his fleet license. He must be required to attach his subsidiary licences to his own cars and not sublease such plates to an unlicensed owner operator as is presently the practice with Calgary's three largest brokers who currently hold 750 TPLs.

b: LET'S BE CLEAR ABOUT ONE THING THOUGH: The foregoing suggests reopening the system which in turn would lead to severe market fragmentation as seen prior to 1986 unless those drivers enter into a revenue sharing contract with the owner. Driver's usually are paid half the earnings under such an arrangement.

c: Divorce rideshare operators from their vehicles and issue a special licence to the vehicle (referred to as "diamonds" in New York City). This would allow any driver holding a taxi driver's licence (commonly called a "badge") to operate said vehicle. Diamond holders will have to be employed by a fleet operator.

d: Only a taxi fleet should be allowed to operate a rideshare business if he wishes to do so, but the number of taxis in his fleet should be the sole criteria used to determine how many ride share vehicles he may employ. This will help control market fragmentation which is the primary source of friction between taxis and ride sharing companies such as Uber.

Issue a TPL to each broker including ride share companies such as Uber and Lyft if they do not presently hold a TPL.

e: Council would do well to consider doing away with licence fees altogether but levy a small excise tax. For example, a 10 cent tax on trips with the 2019 combined volume of 11,825,954 trips would provide the LTS with a budget of \$1,182,595. The LTS budget could be used to determine the size of the levy.

The foregoing is a summary of my conclusions and details will be offered during the course of my oral presentation at Wednesday's meeting.

Best regards

JOHN BLISS

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Public Submission

City Clerk's Office

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* I have read and understand that my name, contact information and comments will be made publicly available in the Council Agenda.

* First name **Cam**

* Last name **Naghshineh**

Email **camnaghshineh@gmail.com**

Phone **4038880658**

* Subject **Livery Regulatory Framework Options report**

Hello,

I would like to submit my comments with respect to the report, Livery Regulatory Framework Options, CPS2020-0708 coming to SPC on July 15th, 2020.

In reading the above mentioned report it is very obvious that the current bylaw is discriminating against the taxi service in Calgary. The data included by the administration clearly supports unjustly paving the way for the erosion of the taxi service in Calgary by giving the competitors the advantage in every possible way!

I am truly surprised that the City of Calgary has allowed this unfair and biased bylaw which is creating a disadvantage for the taxi industry to continue given the clear message that the collected data has shown in this report.

I assure you the punitive restrictions on the taxi industry imposed by the City of Calgary are the sole reason for majority of the challenges faced in the taxi industry to date.

I would like to ask this committee to send the administration back to work on creating one set of rules for all participants in the industry and focus their efforts on safety and enforcement instead of trying to recreate the same broken way of thinking that has landed us in the current situation.

* Comments - please refrain from providing personal information in this field (maximum 2500 characters)



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Thank you!

Cam Naghshineh



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* I have read and understand that my name, contact information and comments will be made publicly available in the Council Agenda.

* First name **Jeff**

* Last name **Garland**

Email **jeffgarland@associatedcab.ca**

Phone **4038881709**

* Subject **Livery Regulatory Framework**

* Comments - please refrain from providing personal information in this field (maximum 2500 characters) **See attached response to Livery Regulatory Framework Options.**

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July 14, 2020

**The City of Calgary
SPC on Community and Protective Services**

Re: Livery Regulatory Framework Options.

To Whom It May Concern:

With regards to Administrations Recommendation, we at Associated Cabs find this whole process to have been a waste of time and the industries money, it truly evident that the City of Calgary Livery Transport has no clue what equality and fairness is about;

Administrations Recommendations.

To start with this notion of a hybrid open/closed entry system is ridiculous and at the same time impressive how Livery just make this stuff up as they go along, there is nothing in the current bylaw that says anything about a hybrid open/closed approach.

What it does say is for the purpose of the bylaw 6m2007

A. is to establish a system of licensing Livery Vehicles, Drivers and Brokerages and Transportation Network Companies.

E.to provide the administration and regulatory mechanisms to administer a controlled-entry licensing system and ensure sufficient industry supply to meet consumer demand. Which to date this bylaw has been ignored and the only part that is controlled is the Taxi industry.

The fact that the City has allowed Transportation Network Companies to enter the market with little or no regulations or fee's in comparison to that of taxi's and limousine has basically allowed TNC's to flood the market with as many

cars and drivers as they want and has certainly ensured that there will never be a demand issue with having total disregard for the taxi or limousine service providers.

B. As for Investigating opportunities to streamlining the processes of issuing taxi plates that reduce administrations cost and councils involvement, we believe giving more power to Livery is the wrong direction as the industry has already seen the effects of Livery's direction since LTAC was disbanded now the industry has no voice as we can see through this bylaw process Livery doesn't consider any of the stakeholders input. I think the most prudent thing that should be done if they truly want to streamline this process is put controls on the number of TNC's in the market at any given time and also either open the TPL's and ATPL's completely or alternatively get rid of the additional classes of TPL's and ATPL's that all TPL's and ATPL's are transferable, being that the reason for the non-transferable licenses was to ensure a sufficient number of vehicles on the road during peak times in the evenings and on the week-ends which has been accomplished by flooding the streets with TNC'S.

C. Allowing companies to allow up front pricing this has good and bad merits attached to it, which is probably not particularly good for consumers and not to mention the amount of problems and complaints this will create concerning fare disputes. We already hear about consumer dissatisfaction around surge pricing from rideshare companies which is sometime three to four times the normal fare this is just gouging consumers.

D. Unified taxi/limousine drivers' licenses this should have been done years ago as there is little difference between a taxi or limousine driver other than the vehicle and uniform.

E. Standardized age of vehicles, we are not against this concept but along with this should come a millage component as well too the vehicles, safety should not be compromised regardless of what livery vehicle a consumer rides in. Extending mechanical inspections to once annually will certainly degrade the safety of vehicles mechanical condition and should be require every six months as they are currently required on all livery vehicles including TNC's,

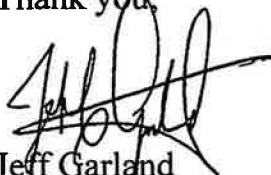
F. Regarding flexibility in vehicle markings, this has already to deteriorated the purpose of specific markings on taxi's and it has already caused a lot of confusion amongst the travelling public that cannot tell the

difference between on taxi or another, As for TNC's they are like undercover taxi's and unless you in the transportation business you will not be able to tell one from a private vehicle and there should be some sort of marking on them more so for passenger safety.

G. Last recommendation: does not go far enough and the camera issue is an issue of safety for the drivers and consumers and should be mandate in all livery vehicles regardless of whether it's a taxi, limousine or TNC and should be clearly marked that you are being recorded.

In closing, I would suggest that if this is all LTS got out of the input sessions through stakeholders, and other participants, I would question who and what they were listening to and the fact that they put this document out late Friday afternoon in a pandemic and the industry is in a total crisis shows a lack of leadership and respect and understanding for this industry.

Thank you,

A handwritten signature in black ink, appearing to read 'Jeff Garland', with a large, sweeping flourish extending to the right.

Jeff Garland
General Manager
403-299-1112



Good afternoon Chair and Committee Members,

Thank you for allowing me to share my thoughts and some concerns with the livery regulatory framework options. I have sent a written presentation for you in the event I am unable to call into the meeting.

Some of my concerns are not new, but they are real and based on an honest belief that the future of the taxi industry in Calgary is in serious jeopardy. It is in danger, not because there is competition here and another dominant player in the market, but because the City has refused to ensure there is a climate that will enable the taxi industry to compete honestly and fairly in the market. You have heard those concerns several times before, and I get the impression they have fallen on deaf ears.

Livery Transport Services has provided you with 7 recommendations to approve today and its rationale for them. In reviewing that rationale, I believe this report has downplayed the taxi industry feedback from the stakeholder engagement sessions.

Recommendation A:

Leaving the status quo on what has been termed a hybrid open, controlled system is a disaster waiting to happen. LTS has given a brief history of what led to a cap on taxi licenses in the 80s. The economy was in a downturn, and Council froze the plates to help ensure public safety and service standards. I believe that Calgary's economy in 2020 is worse than it was in the 80s, and there is no immediate end in sight. I feel that a cap needs to be put in place for both taxis and TNC's to preserve the livelihood of all drivers. I recommend that a pilot project should be put in place to cap the number of TNCs. Currently, there are 5200 licensed TNC vehicles and only 1880 licensed taxis.

When I read the regulatory framework rationale as to why you should not cap TNC's, I found them to be weak and superficial. I'm going to highlight some of their reasons why Council should not cap TNC's.

1. **May lead to shortages at peak time/ events.** It is not unacceptable for Calgarians to have to wait 10 or 15 minutes to get a ride during peak times. Remember, these are the same consumers who may have stood in line for up to one hour to get into a venue.
2. **May create a TNC black market for licenses.** How can that happen? TNC licenses are non-transferable, and they are directly linked to the driver and the vehicle. There is no license that can be sold.
3. **Increase administration costs and higher driver turnover.** If drivers were making a decent living, I believe that the turnover for both industries would be much less than what it is today, and the result would be less administration cost.
4. **TNC's may choose to leave a market affecting consumer choice.** It seems to me that the City is more concerned about who is leaving the business, rather than the strength of the industry itself. I went to the challenges side of the options analysis on keeping the taxi market closed and surprise, nowhere does it state that the City is concerned if the taxi industry leaves a marketplace that could affect consumer's choice. Is LTS saying that it is more concerned with keeping the TNC companies happy than looking after the livery industry as a whole? It leaves me with the impression if the taxi

companies leave the City then so be it? What I find truly amazing is that everything that is in this recommendation is dumbing down the bylaws to fit the needs of a specific company, as opposed to saying here are our requirements, this is what you need to do to work in the City of Calgary.

5. **LTS says a closed taxi system lowers congestion on city streets and makes enforcement of the bylaw easier to manage.** Doesn't an increased and ever-growing number of TNCS on the road create more congestion and make bylaw enforcement more challenging to manage. Capping of all vehicles on the road will create a more manageable system and reduce costs overall for LTS. By not capping TNCS, you will also be forcing the remaining WHEEL CHAIR ACCESSIBLE DRIVERS out of the accessible wheelchair business. The 20 percent decline in revenue for taxis has had a significant effect on revenue for future accessible supply. Those drivers would do their accessible work, and then on heavy weekend nights, they would boost their income. There has been a steady decline in accessible drivers and vehicles since the entrance of TNCS in the market. The first victims of not capping the TNC's are the wheelchair taxis. I believe currently only 80 out of 189 on the road today.

Recommendation E:

Calgary has always been a leader in the livery industry. With the changes before you, you are lowering our standards to fit the needs of the TNC companies. Here we are again taking our age of vehicles from 8 years to 10 years and changing our mechanicals from every 6 months to 12 months. It is a safety concern for the drivers as well as the general public. Whether it is a taxi or TNC, these vehicles should be inspected every 6 months. I ask you, why is this even being considered? Do fewer inspections improve safety standards, or are we doing this to appease a participant in the industry for fear that it might leave. How does extending vehicle life from 8 years to 10 years and cutting the required City approved inspections from twice a year to once a year increase public safety measures?

Recommendation F:

I do agree that the TNC's should have markings on the front and back of their vehicle while they are on the road, including the 311 bumper sticker that taxis must-have. I think there needs to be more discussion between LTS and the companies about eliminating the brand identification color. Allowing taxi owners to paint their cars any color they want will increase the workload of administration and can make all the vehicles in the city look like TNC vehicles. Is that the intent?

Recommendation G:

Having cameras in all livery vehicles is a must for the safety of Calgarians. Cameras eliminate any doubt about what happened in the vehicle at any time during the trip. There is a myth that the person booking on an APP is the person that rides in the TNC. This is absolutely not true. In fact the only thing for certain is that there is a credit card to charge when using the APP. I ask Council, is your role to protect the traveling public, or is it to meet the business model of one company. Is Council's mandate to meet the safety needs of Calgarians or is to appease a company for fear that they might leave the City.

In summary, the recommended updates to the Livery Transport Bylaw provides no substantial changes to TNCS, while making cosmetic changes to the taxi portion of the bylaw, not address the current barriers to entry, and significantly increasing the safety concern for the Calgarians. Council you should demand better than this.

Thank you, Kurt Enders