Tuesday, November 08, 2016

2:00 p.m. – Regular Meeting

Boardroom WT-2C
2nd Floor, West Tower – City Hall

Members: Broker Representatives:
Milton Bhangoo
Makhan Dhother
Joe Farrugia
Avtar Grewal

Plate Owner Representatives:
Louis Gotzamanis
Amarjit Grewal
Zafar Tariq
Jaswant Uppal

Driver Representatives:
Daljit Gill
Rajinder Rai
Lynn Slade

Citizen Representatives:
Ravinder Chahal
Sushil Ninawat

Accessibility Advisory Committee Representative:
Raymond Shaver

Council Member Representatives:
City Councillor P. Fortini – Wards 7 and 8
City Councillor G. Dhillon – Wards 9 and 10

For inquiries about this Agenda, or to make arrangements for accessibility accommodations for persons attending (some advance notice may be required), please contact:

Sonya Pacheco, Legislative Coordinator
Telephone (905) 874-2178, TTY (905) 874-2130, cityclerksoffice@brampton.ca

Note: Some meeting information may also be available in alternate formats, upon request.
Agenda
Taxicab Advisory Committee

Note: Please ensure all cell phones, personal digital assistants (PDAs) and other electronic devices are turned off or placed on non-audible mode during the meeting.

1. **Approval of Agenda**

2. **Declarations of Interest under the Municipal Conflict of Interest Act**

3. **Previous Minutes**

3.1. **Minutes – Taxicab Advisory Committee – June 14, 2016**

The minutes were considered by Corporate Services Committee on September 7, 2016 and the recommendations were approved by Council on September 14, 2016. The minutes are provided for Committee’s information.

4. **Delegations/Presentations**

5. **Reports**

6. **Other/New Business**

6.1. Verbal Update from James Bisson, Manager, Licensing Enforcement, Corporate Services, re: **2016 Review of the Formula for the Issuance of Taxicab Owner’s Licences (Plates) from the Priority List (reviewed years 2014 & 2015)**.

6.2. Verbal Update from James Bisson, Manager, Licensing Enforcement, Corporate Services, re: **Taxicab Advisory Committee (TAC) Recommendation TC016-2016**:

TC016-2016 That the following suggestions of the Taxicab Advisory Committee, relating to taxicab driver licensing requirements, be referred to staff for review and consultation with Legal Services staff, and to report back to a future Taxicab Advisory Committee meeting:

- That the requirement to complete a driver training program be eliminated; and,
- That only a driver’s abstract and criminal record search be required.
7. **Correspondence**

7.1. Correspondence from Chris Schafer, Uber Public Policy Manager - Canada, Uber Canada, dated June 27, 2016, re: **Uber Response to Correspondence Items on the March 29, 2016 and April 19, 2016 Taxicab Advisory Committee Agendas**.

7.2. Correspondence from Narinder S. Pandher, Taxicab Plate Owner, re: **Suggestions for Consideration by the Taxicab Advisory Committee relating to:**
   - Formula for issuing taxi plates
   - Driver training requirements
   - By-law requirements for taxicab plates

8. **Information Items**

8.1. **Taxicab Advisory Committee – 2017 Schedule of Meetings**

   Note: Committee discussion will take place regarding the start time of future Taxicab Advisory Committee meetings.

9. **Question Period**

10. **Public Question Period**

    15 Minute Limit (regarding any decision made at this meeting)

11. **Adjournment**

    Next Meeting: February 28, 2017
Tuesday, June 14, 2016

Members Present: City Councillor G. Dhillon – Wards 9 and 10, Chair
City Councillor P. Fortini – Wards 7 and 8, Vice Chair

Broker Representatives:
Milton Bhangoo
Makhan Dhother
Joe Farrugia

Plate Owner Representatives:
Louis Gotzamanis
Amarjit Grewal
Zafar Tariq
Jaswant Uppal

Driver Representatives:
Daljit Gill
Lynn Slade

Citizen Representatives:
Ravinder Chahal

Accessibility Advisory Committee Representative:
Raymond Shaver

Members Absent:
Avtar Grewal, Broker Representative – regrets
Rajinder Rai, Driver Representative
Sushil Ninawat, Citizen Representative – regrets

Staff Present:
Corporate Services:
John Avbar, Director, Enforcement and By-law Services
James Bisson, Manager, Licensing Enforcement
Earl Evans, Deputy City Clerk
Sonya Pacheco, Legislative Coordinator
The meeting was called to order at 1:07 p.m. and adjourned at 3:35 p.m.

1. **Approval of Agenda**

   The following motion was considered.

   TC013-2016 That the agenda for the Taxicab Advisory Committee Meeting of June 14, 2016 be approved as printed and circulated.

   Carried

2. **Declarations of Interest under the Municipal Conflict of Interest Act – nil**

3. **Previous Minutes**

3.1. **Minutes – Taxicab Advisory Committee – April 19, 2016**

   The minutes were considered by the Corporate Services Committee on May 4, 2016 and the recommendations were approved by Council on May 11, 2016. The minutes were provided for Committee’s information.

4. **Delegations/Presentations – nil**

5. **Reports – nil**

6. **Other/New Business**

6.1. Discussion at the request of Milton Bhangoo, Committee Member, re: **Reduction of the Taxi Plate Transfer Fee**.

   Committee discussion took place regarding the fee to transfer a Taxicab Owner licence, as follows:
   - Opinions/concerns that Brampton’s fee to transfer a Taxicab Owner licence is too high and should be reduced
   - Request for information regarding similar fees in surrounding municipalities
   - Indication from staff that licensing fees were reviewed in 2014
   - Questions regarding the establishment of a reduced fee for transferring a licence to a spouse, sibling, child or corporation
• Concerns regarding automatic increases to licensing fees by the percentage increase of the Consumer Price Index
• Justification of licensing fees (e.g. cost recovery)
• Request that transfer fees be reviewed

The following motion was considered.

TC014-2016  1. That staff be requested to review fees for Taxicab Owner Licence transfers, including actual costs for the administration of such transfers, for possible adjustments and a recommendation to a future Taxicab Advisory Committee meeting; and,

2. That staff review the possible elimination of the CPI increase on taxi licensing fees, and on any other mobile industry in which set rates are regulated by the City.

Carried

6.2. Discussion at the request of Joe Farrugia, Committee Member, re: Licensing Extensions for Accessible Taxicabs.

Joe Farrugia, Committee member, provided information on the costs associated with operating, maintaining and insuring accessible taxicabs. Mr. Farrugia advised that these costs are higher than those for regular taxicabs and requested a one-year extension to the eligible vehicle model year for accessible taxicabs.

Committee discussion took place with respect to the following:
• Cost of operating an accessible taxicab
• Provisions of the Mobile Licensing By-law relating to eligible vehicle model years
• Concern that the condition of commercial vehicles declines faster than personal vehicles
• Vehicle inspection requirements for accessible taxicabs under the Highway Traffic Act
• Suggestions to permit one additional model year for accessible taxicabs
• Possible model year extension for regular taxicabs and a suggestion that this matter not be considered at this time
• Staff considerations of the request for a model year extension for accessible taxicabs (e.g. review of practices in other jurisdictions, condition/maintenance of vehicles)
• Indication that currently only three accessible taxicabs have a 2007 model year and no longer meet the requirements of the by-law
The following motion was considered.

TC015-2016 That it is the position of the Taxicab Advisory Committee that the eligible vehicle model year for accessible taxicabs be extended by one year, in recognition of costs, including insurance costs, to operate these vehicles.

Carried

6.3. Discussion, re: Municipal Decisions Regarding Transportation Network Companies (TNC).

City Councillor Dhillon, Chair, outlined the purpose of providing Committee members with information on various municipal decisions relating to Transportation Network Companies (TNCs), and highlighted the importance for members to provide their input and make suggestions on how Brampton should proceed.

Committee discussion took place with respect to the following:

- The need to simplify the process and reduce costs to become a licenced taxicab driver
  - Indication that driver training courses are expensive and not required by the City of Toronto
  - Indication that it is easier and less expensive to become an Uber driver
- Modifying the taxicab industry to compete with Uber
- Suggestion to eliminate the requirement for taxi drivers to:
  - Complete the driver training program
  - Complete a by-law “knowledge” exam
  - Have working knowledge of the English language
- Questions regarding Uber-related enforcement activity
- Request that Committee members review the decisions of other municipalities regarding TNCs, and bring forward options for consideration at a future Committee meeting
- Lack of taxicab stands at Bramalea City Centre and the need to address this issue
- The need to establish long and short term goals
- Taxicab driver licence requirements in the City of Toronto
- Suggestions for possible changes to the taxi tariff and an indication that further discussion on this matter would take place at a future meeting:
  - Eliminate a minimum; establish a maximum
  - Establish a range that may fluctuate during the day
In response to questions from Committee, staff advised that:

- Uber has not requested, and would not be eligible to receive, a taxi brokerage licence
- information regarding Uber-related enforcement activities cannot be provided at this time

The following motion was considered.

TC016-2016 That the following suggestions of the Taxicab Advisory Committee, relating to taxicab driver licensing requirements, be referred to staff for review and consultation with Legal Services staff, and to report back to a future Taxicab Advisory Committee meeting:

- That the requirement to complete a driver training program be eliminated; and,
- That only a driver’s abstract and criminal record search be required.

Carried

6.4. Discussion, re: Next Meeting Date / 2016 Meeting Schedule.

There was Committee consensus that the next meeting would be scheduled at the call of the Chair.

7. Correspondence – nil

8. Information Items – nil

9. Question Period

1. In response to a question from Zafar Tariq, Committee Member, as to when staff will be reporting back on their review of Uber, James Bisson, Manager, Licensing Enforcement, Corporate Services, provided information on the review process/activities (e.g. industry feedback, public survey) and indicated that a report is expected to be completed in October 2016.
2. In response to a question from Milton Bhangoo, Committee Member, regarding the number of charges laid against Uber drivers, John Avbar, Director, Enforcement and By-law Services, Corporate Services, indicated he had no information to provide on this issue.

In response to a further question from Mr. Bhangoo regarding the number of charges laid against taxicab drivers, Mr. Bisson advised that he would review this request and provide a response.

10. **Public Question Period** – nil

11. **Adjournment**

The following motion was considered.

TC017-2016 That the Taxicab Advisory Committee do now adjourn to meet again at the call of the Chair.

Carried

City Councillor G. Dhillon, Chair
Dear Ms. Pacheco,

RE: Agenda Items from March 29th and April 19th, 2016, Brampton Taxicab Advisory Committee Meetings

This is in response to agenda items from the March 29th and April 19, 2016, Brampton Taxicab Advisory Committee meetings, specifically:

1. Letter dated September 18, 2015, from Mr. Baljit Pandori, Peel Taxi Association re Municipal Rideshare and Unlicensed for Hire Operations

2. Letter dated April 19, 2016, from Mr. Harjit Kaur Sanghera, Brampton Taxi Industry re Uber--Public Safety Concerns

Below are responses to the above letters on behalf of Uber Canada. The “PANDORI LETTER” and “SANGHERA LETTER” sections below include select quoted excerpts from the letters themselves, followed by an “UBER RESPONSE”.

<table>
<thead>
<tr>
<th>PANDORI LETTER</th>
<th>“On September 16, 2015 the City of Toronto Municipal Licensing and Standards Committee took a strong stand in rejecting the proposed changes that would allow a new classification of taxis called the Transportation Network Company.”</th>
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<tbody>
<tr>
<td>UBER RESPONSE</td>
<td>On May 3, 2016, Toronto City Council made a series of decisions related to taxicab, limousine and Private Transportation Company (PTC) regulations. By creating the new Private Transportation Company (PTC) licensing category, companies such as Uber are permitted to operate in Toronto, with regulation. Read more here: <a href="http://www1.toronto.ca/wps/portal/contentonly?vqnextoid=d887d8201c207410VgnVCM10000071d60f89RCRD">http://www1.toronto.ca/wps/portal/contentonly?vqnextoid=d887d8201c207410VgnVCM10000071d60f89RCRD</a></td>
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In April 2016, Ottawa was the first city in Ontario to adopt ridesharing regulations for Private Transportation Companies (PTCs). This follows on the heels of Edmonton being the first city in Canada to adopt smart ridesharing regulations.

Ridesharing regulations consist of:

- **Licensing:** Transportation Network Companies (TNCs like Uber) are licensed and not individual drivers
- **Fares:** Fares are not regulated, so different companies can set their fares for different services. Fares are always transparent in-app (taxi can operate on the same basis in-app to compete)
- **Insurance:** TNC (Uber) maintains insurance with minimum liability specified by City as approved by Financial Services Commission of Ontario (FSCO)
- **Driver Background Screening:** TNC requires drivers undergo background checks. Results of checks are made available to City to ensure compliance
- **Training:** TNC establishes driver training program and makes it available to City and rider feedback after each trip (anonymized and shared with drivers) provides an on-going for of training.
- **Accessibility:** TNC includes option for accessible vehicle (e.g. uberWAV) and if accessible vehicle not available, TNC to direct passenger to alternate service provider of accessible service or pay fee to the City.
- **Record Collection and Data Reporting:** TNC provides City regular reporting of data
- **Driver Requirements:** TNC drivers do not street hail or occupy taxi stands
- **Vehicle Inspections:** TNC ensures drivers are using vehicles that are inspected regularly by a licensed facility and TNC keeps documentation of inspection reports and makes them available to City to ensure compliance

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<tr>
<th>PANDORI LETTER</th>
<th>“Brampton has put in place strong rules governing taxis and limousines. It has served the public well and ensures that there are a balanced number of taxis to meet the demand.”</th>
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<tbody>
<tr>
<td>UBER RESPONSE</td>
<td>Flexible supply and dynamic pricing on the Uber platform enables drivers to come on the road when they are needed which increases operational efficiency and productivity in contrast to having an increased number of</td>
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</table>
Flexible supply best meets consumer demand (No supply caps):

- Cities and residents should enjoy transportation alternatives that are reliable at all times of day in all communities.

- Traditionally underserved communities get greater access to reliable and affordable transportation. For example, in a mature Uber market like Chicago, four in ten trips begin or end in what the city has deemed to be traditionally underserved neighbourhoods.

- Uber teams track major events and peak demand periods to proactively encourage partners to be on the platform to serve riders.

In cities across Canada, traditional taxi regulations restrict entry by requiring a license to operate a taxi. This limits the supply of available taxis in a city. While taxis are an integral component of the urban transportation network of any city, and will remain so into the future, the main effect of such supply restriction, is that prices remain high, taxis wait times are longer, among other undesirable policy outcomes.

Regulating ridesharing is an opportunity to re-examine the regulations governing the taxi and limo industries and make necessary changes to reduce the regulatory burden on them and help them be more competitive in a changing ground transportation industry.

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<tr>
<th>PANDORI LETTER</th>
<th>“We also wish to draw your attention to the fact that there is no independent monitoring system of these illegal for hire operators where the public can register a complaint. With an electronic transfer of funds system there is no protection for passengers who have been taken advantage or received inferior service”.</th>
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<tr>
<td>UBER RESPONSE</td>
<td>With the Uber app, riders and driver-partners are asked to rate each other and provide feedback for every trip before requesting or accepting another ride. This feedback is monitored and responded to by Uber 24-hours a day.</td>
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The fact that Uber driver partners know they are being rated on each trip, in addition to the feedback provided after trips by riders, enables Uber driver partners to constantly improve customer service.

As Ottawa’s Policy Options paper notes, “Customer service concerns
have been raised by users of the traditional taxi service, while customer service provided by Uber drivers has been reported as generally being very good. This raises a question as the effectiveness of the course relative to other mechanisms, such as driver rating”.

Research firm Core Strategies who conducted the focus groups in September 2015 for the City of Ottawa’s taxi bylaw review, reported that Uber scored higher than taxi for car cleanliness, comfort and driver courtesy. Uber driver partners were found to be more caring, professional, and engaged than taxi drivers.

Uber only accepts electronic forms of payment. Given that payments can be made automatically and securely via electronic methods such as a credit card or PayPal account on file, riding with Uber significantly reduces the potential risk and conflict that can stem from disputed fares, lack of cash, or fare evasion. This is particularly good for drivers because carrying large quantities of cash can make them a target for crime.

Given the feedback mechanism built right into the Uber app, not only can passengers register complaints, but they receive prompt customer service response. For example, if a passenger feels the driver took a longer route than necessary, they can provide feedback in-app and with GPS routing, the Uber customer service team can refund the portion of the inefficient trip directly to their credit card.

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<tr>
<th>PANDORI LETTER</th>
<th>“…misleading information is being given to potential [Uber] drivers, including…Criminal record searches are performed by an outside company that are superior to the searches supplied by the local police departments for the taxi industry”</th>
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<tr>
<td>UBER RESPONSE</td>
<td>Uber contracts with screening providers such as ISB Canada. These providers have relationships with local police forces that search the National Repository of Criminal Records and the Police Information Portal (PIP) and Firearms Interest Police (FIP) databases which contains local police information. According to the RCMP’s Dissemination of Criminal Record Information policy, Police forces that partner with third party companies to provide criminal record screenings must submit their agreement to the RCMP &quot;for review and approval to ensure that the Agreement conforms to applicable legislation, the Ministerial Directive and CPIC policy.” As per the RCMP’s policy, if the police agency finds a record on one of the databases searched, it informs Uber via the third-party that a record</td>
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has been found. Uber does not receive the details of the record. Uber then informs the prospective driver-partner that they will not be able to gain access to the platform. If the search is inconclusive, then fingerprinting is required to confirm the existence of a record. At that point the partner is provided the opportunity to go through a fingerprinting process at a local police station to complete the check. Only partners who have no record found in the databases searched are permitted to gain access to the partner app and offer rides.

Beyond criminal records contained in the national repository, police search the Police Information Portal (PIP) and Firearms Interest Police (FIP) databases that contain local police information from police stations across Canada.

PIP is an index of all police agency Record Management Systems across the country. It provides police to police occurrence records awareness and sharing among all Canadian police services. It is currently indexing 30 million police occurrences and is accessed by Canadian police agencies over 1 million times per month. Individual agencies decide what information they want to make available to other law enforcement agencies, while retaining ownership of the data.

FIP was created to ensure that people applying for or holding a firearms possession and acquisition license do not have a criminal history that would disqualify them from owning a firearm. The FIP database is created from a daily, automated search of local police Record Management Systems for Universal Crime Reporting (UCR) codes related to police interactions involving over 300 different offences (attached). The system is automatic, and does not require police services to “upload” information, although they can manually add additional records into the system.

| PANDORI LETTER | “Increased unregulated supply has the ability to drive down wages and force some operations out of business when they are handcuffed by a set of rules they agreed to comply with”. |
| UBER RESPONSE | Ridesharing is an ad hoc commercial pursuit with uberX driver partners offering a shared ride on a schedule of their choosing. Most Uber driver partners drive on the Uber platform for less than 10 hours a week. In many ways, Uber for these driver partners is not a full-time or part-time opportunity, but an opportunity to earn a few extra thousands of dollars a year to pay for a family vacation, save for a mortgage down payment, retirement, etc. |
Without new ridesharing regulations, Uber is unable to expand the market for for-hire transportation and make it more accessible to more Ottawa residents. Uber is not pushing the existing taxi companies out of the market and colonizing it for itself, Uber is in fact expanding it by tapping into dormant demand for transportation related services that traditional taxi regulation, drafted in the pre-internet and pre-smartphone era, has stifled due to expensive fares and poor customer service which are hallmarks of monopolies and oligopolies that exist at the behest of traditional taxi regulatory frameworks.

With respect to taxi deregulation in the 1970s, such reform efforts were from a time that was prior to the ubiquity of smartphones, the Internet, or the emergence of ride-share enabling technologies. The introduction of Uber actually results in the opposite along many dimensions of what is suggested (lower driver incomes, less investment, etc.):

- With the prevalence of the Internet today, Uber customers using a smartphone app to request a ride, are able to compare prices and the quality of customer service offered by a range of companies, more easily than ever before. This was not the case in the 1970s or for academics that studied the issue prior to the last 5 years or so, which explains why in the absence of information and being able to compare prices and quality of service between taxi companies, prices rose and quality of service declined. However, open entry for companies like Uber has meant improved transportation availability and lower rates. The ability of consumers in the Internet era to more readily access information and share it (both positive and negative), means that companies like Uber have to continually strive to improve customer service or risk losing customers to competitors.

- Flexible supply and dynamic pricing on the Uber platform enables drivers to come on the road when they are needed which increases operational efficiency and productivity in contrast to having an increased number of taxis on the road at all times increasing congestion.

- Ride-sharing alternatives actually help to relieve congestion. UberPool, like carpooling when you share a ride and split the costs, has profound implications. On average uberX is already 30% to 50% cheaper than traditional taxi and becomes upwards of 80% cheaper with UberPool. This allows Uber to become cost-competitive with owning a car. Technological innovations like UberPool which were not possible pre-smartphone can achieve real results in terms of reducing the number of cars on the road, congestion in cities, pollution, and parking challenges.
- In cities, where Uber has introduced uberX, rates for riders have decreased. UberX is about 30-50% cheaper than a taxi, depending on the city in Canada. With uberX's affordability, even more users can rely on a safe and reliable ride. At the same time, as long as demand keeps growing, and Uber has seen no sign that it won't in the markets it has entered, that means there are more riders, and that means drivers will be doing more trips per hour. The more efficient a driver is, the more money they earn.

- High customer service levels are a core value of the Uber platform. Collecting feedback is an important part of ensuring a high quality experience for Uber riders and partners alike. That's why riders are encouraged to anonymously rate and provide comments about their experience at the end of every trip and drivers can do the same. This feedback is continuously monitored to improve customer service and experience.

| PANDORI LETTER | “Both Brampton and Toronto requires taxi to be inspected at regular intervals, carry proper insurance and have drivers take mandatory training and refresher courses. Currently, to the best of our knowledge, no illegal for hire operator has to meet that same standard”.

| UBER RESPONSE | See other sections of this report for information with regards to ridesharing and vehicle inspections and insurance.

With respect to Uber and driver-partner training, independent studies (i.e. KPMG in Ottawa) show Uber without traditional city-led in class training courses already outperforms taxi on customer service measures. Drivers no longer need to rely on map/destination training as the uber app log destinations automatically for drivers. Driver ratings and real-time feedback on customer service in the Uber app allows customers to apply effective customer service “discipline”.

**What Uber does currently:**
For prospective and current Uber driver partners, video training is available online, see: The Uber Experience. See also Uber Driver Partner App. Partners can also come into Partner Support Centres for assistance. Uber in app 5-star rating + written feedback in app on each trip ensures better customer service. Feedback is anonymized and provided to driver to enhance customer service.

Remedial training is available through a 3rd party, online provider R3Z Solutions.
| **Warning:** | When an Uber driver partner is warned, they can take an online course called "Quality Improvement General" and it is a 40-60 minute self-directed class. It is meant to help them out before potential deactivation. The link for this course is: [uber.com/qualitywarning](http://uber.com/qualitywarning). |
| **Deactivation:** | In the event of temporary deactivation due to quality issues, Uber driver partners are sent an email along with a course link. This course is "Quality Improvement Recovery" and is 85-100 minutes and is done 1x1 with an instructor. In order for someone to be reactivated they must complete this course and enrolment and completion is validated with the course provider. The link for this course is: [uber.com/deactivation](http://uber.com/deactivation). |

| **PANDORI LETTER** | “This is an alarming indictment of a technology [Uber] that has no safeguards built into their system”. |
| **UBER RESPONSE** | As noted above, Uber’s background checks use CPIC to search the National Repository of Criminal Records and PIP to search local police records. |

Uber’s background check uses the same checks as Girl Guides of Canada and other national and provincial organizations.

Uber driver partners are also subject to a local police check, provincial motor vehicle reference check for ticketable offences, vehicle inspection by certified mechanic (cities with ridesharing regulations in place in Ontario generally require an annual Safety Standard Certificate for a vehicle inspection), and insurance.

In addition, additional technological based safeguards are built into the Uber app:

**Trips are not anonymous**
When a driver-partner accepts a request, a rider sees his or her first name, photo, vehicle model, and license plate number. Riders can also check whether others have had a good experience with him or her.

**Share your location**
Riders can easily share their trip details -- including the specific route and estimated time of arrival -- with selected friends or family at the touch of a button or use “Family Profiles” and trip details are automatically shared with loved ones when a trip is taken with Uber.
### Feedback and ratings after every trip

Riders and driver-partners are asked to rate each other and provide feedback for every trip before requesting or accepting another ride.

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<th>PANDORI LETTER</th>
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<tr>
<td>“This skews the passenger profile and does not address the fundamental equality of access to the public. If illegal for hire operators were able to draw on only the most profitable passengers and leave the rest it will result in the eventual collapse of the taxi industry”.</td>
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<td>“Under the guise of providing allegedly better service it may result in the elimination of the traditional taxi company. If that happens then prices will rise as this unregulated and unsupervised industry has already shown recently.”</td>
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<td>Uber operates all over the world in over 350 cities. The taxi industry continues to be a vital part of local transportation in these cities and will continue to be so. With every new additional choice in ground transportation (i.e. airport express trains, carsharing, bikesharing, etc.), the taxi industry expressed concern about the impact on its industry, yet taxi continues to thrive.</td>
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<td>Bringing Uber and ridesharing under a regulatory framework, albeit one that recognizes the “unique business model” of ridesharing (most Uber driver partners drive less than 10 hours a week), such as the one the Toronto and Ottawa by-laws provide, still enables competitive taxi industries. For example, Uber entered the Mississauga market in 2013. City staff note that “in 2015 total dispatched trips for the eight [taxi] brokerages combined increased by 6.8% compared to 2013”. This occurred while TNCs like Uber operated outside a regulatory framework in Mississauga. Thus, the ground transportation “pie” is growing in Mississauga as it is in other cities across Ontario and this is good for local residents who now have access to greater ways of getting around their city today. This will enable a greater number of people to live car-free or car-light lifestyles with resulting benefits to reduced traffic congestion and pollution.</td>
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<th>SANGHERA LETTER</th>
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<tr>
<td>“We are all aware that Uber X drivers are driving without commercial insurance”.</td>
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<tr>
<td>Every ride on the uberX platform has always been backed by contingent coverage for bodily injury and property damage to third parties. This means that if, in the event of an accident, a ridesharing partner's own</td>
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personal insurance does not apply for any reason, passengers, pedestrians, other drivers, and the community at large can rest assured knowing that ridesharing partners remain covered by a robust first-class policy. This coverage exceeds the standard requirement for taxi and limo insurance in Canada and is backed by an insurance company rated A (Excellent) by A.M. Best.

Uber has announced a relationship with Intact Financial, Canada’s largest home, auto and business insurer. Uber has been working closely with Intact Financial to develop a new and innovative insurance plan for ridesharing in Canada that we are confident will come to market soon.

Intact Financial is working with insurance regulators and different levels of government in the provinces where ridesharing currently exists (Ontario, Alberta and Québec) to create an insurance product in collaboration with stakeholders that satisfies the requirements of both insurance and transportation regulators.

| SANGHERA LETTER | “Uber claims to run third party checks on its drivers, and that they will not provide any data to the city as it will infringe the drivers’ privacy. If the city does not have access to such data, are we comfortable with women and children being driven by convicted rapists? There is no way of proving that an assault has taken place if there are no cameras in Uber vehicles”.

| UBER RESPONSE | The key change with ridesharing regulations is a move from dual-licensing (with companies and drivers both needing a license) to a unified regime where only companies are licensed and where local residents can become a driver as long as they meet/pass standard criteria outlined by the City (criminal background checks, vehicle safety inspection, motor vehicle reference check, etc.).

However, it must be noted that this model is a co-regulatory model and not self-regulation. This model does not reallocate safety and consumer protection responsibilities away from municipalities to a third party. The municipality still sets the regulatory requirements for ridesharing with respect to public safety and consumer protection. Under this regulatory model, for example, the third party provider (i.e. Garda in Quebec and ISB in Ontario) conducts the background check on behalf of Uber through the local police required by regulation and the city audits the Transportation Network Company (TNC) / Uber to ensure compliance with the requirement to conduct said background check.

An audit-based regulatory model is the standard for regulating TNCs, such as Uber and Lyft, across jurisdictions in the United States. Cities
have preferred an audit-based regulatory model due to its efficiency. An audit-based model empowers cities while avoiding the cost and complexity of creating real-time registries or registering individual drivers—activities that do not enhance safety or compliance. Audit-based systems allow cities to effectively keep pace with the growth of TNCs. In addition, different TNCs likely store the required documentation via different means. Creating a real-time registry that links to various companies’ databases would be costly and complicated, with significant privacy and business trade-secret concerns. All levels of government have faced challenges when creating new registries. Moreover, the goals of such a registry - enhanced safety through real-time compliance - are easily achieved via audits and street enforcement.

**In-vehicle cameras**

In-vehicle cameras are necessary for taxis because of the nature of taxis business model. Whether someone calls a broker, street hails, or gets a taxi at a taxi stand, the passenger remains anonymous to the taxi brokerage and driver. When passengers are anonymous and drivers carry cash, security cameras are necessary.

With uberX, trips are not anonymous. When a driver-partner accepts a request, a rider sees his or her first name, photo, vehicle model, and license plate number.

In cities across Ontario, limousines are not currently required to have in vehicle cameras because, like TNCs (Uber), the limousine model is based on prearrangement between two parties that must identify themselves.

The Ottawa *Policy Options paper* paper notes that, “…there have not been any incidents which would suggest cameras should be a requirement under the amended regulation”. The City of Calgary and Edmonton in their ridesharing regulations is not making it a requirement that Transportation Network Companies (TNCs) like Uber have security cameras in ridesharing vehicles for these reasons.

In addition, uberX is also a cashless platform, which means drivers do not need to carry cash in vehicle, every trip is GPS monitored, and each trip is subject to in app feedback mechanisms (that include the ability to provide written feedback after each trip) that is monitored and responded to in real time by Uber.
The following are suggestions we would like to bring to your attention:

1. The current formula on issuing new taxicabs to the City should be reviewed immediately. The demand for Taxi Cabs has decreased over the past few years due to ridesharing programs such as Uber/Lyft. A lot of plates are now sitting on the shelf and not being used.

2. All the training and exams required for new cab drivers to pass should be eliminated. This process is discouraging new drivers to enter the Taxi Industry. Taxi Cab Company will train the drivers.

3. Currently, the City by-law enforces Taxicab owners to keep their plates in the City shelf for a maximum period of 2 months before they have to give it up back to the City should be eliminated for unlimited times.

Mridula Pandey

Plate owner
Taxicab Advisory Committee

2017 Schedule of Meetings

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Meetings are scheduled to commence at **1:00 p.m.** and are held in Boardroom WT 2C/2D (2nd Floor, West Tower) unless otherwise noted on the agenda.

**Members:** If you are unable to attend a meeting, please contact Sonya Pacheco, Legislative Coordinator, at (905) 874-2178 or sonya.pacheco@brampton.ca at your earliest convenience.