

**WISCONSIN ASSOCIATION OF TAXICAB OWNERS – MILWAUKEE CHAPTER**

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April 29, 2013

Alderman Terry Witkowski, Chairman  
Public Safety Committee  
City Hall Room 201  
200 East Wells Street  
Milwaukee, WI 53202

Re: File No. 111222 – Taxicab Permitting Ordinance

Dear Alderman Witkowski:

On behalf of Milwaukee's taxicab permit holders and operators, thank you for the opportunity to speak at the recent meeting of the Public Safety Committee. We felt that the discussion and questions asked by committee members were both thoughtful and productive.

As a follow up to that meeting we would like to re-confirm our commitment to work with you and the members of the Public Safety Committee to achieve an amended ordinance that best serves the interests of taxicab riders, drivers, owner/operators and the public at large. We believe that the hearing you've scheduled for May 6 will also provide us all with information on what we can do to improve the volume of taxicab business in the city and provide better service to our customers.

There are several elements of the proposed ordinance with which we agree and believe will strengthen the customer experience ; creating new permits that specifically limit the holder to operating the vehicle,, steps to modernize taxicab fleets, and step up the background check and vehicle inspection systems. In making these changes, however, we believe it's important to the industry that the rights of the existing taxicab professionals be preserved, specifically our leasing and transferability rights. The hearing made it clear that these rights need not be eroded to adopt new reforms to the system.

Much testimony was provided at the April 18, 2013 hearing based upon the assumption that expanded permits are needed to address unmet demand for taxicab service in Milwaukee. There was little, if any, hard evidence to back up these claims or otherwise establish a rational basis for revising the current limits on permits in the current ordinance. With respect to the expansion in the number of permits, we urge the Committee to carefully research the current market and to obtain verifiable data upon which decisions can be made regarding demand factors that would justify any increase in the number of permits. Data based upon historical ride patterns and wait times available from the dispatch companies can help policy-makers better understand the nature of the business and drive decisions without creating unintended consequences. We pledge our cooperation and assistance in conducting such a study.

A strong and effective taxicab dispatch system is essential to serving the rider demand and addressing any problems that may arise. Taxicab organizations such as American United, All City Veteran taxi and Yellow Cab Coop with adequate resources and staffing have the capacity to field complaints and address them in house (as is currently done and reflected in the low number of complaints filed with the City licensing office). Likewise, taxicab owner-operators are in the best position to update their fleets; maintain safe and clean vehicles; and develop, conduct and enforce customer service training. In this spirit we suggest the following additional recommendations be included in any new ordinance:


April 29, 2013

Page Two

- Require all driver's to complete an online driver training course offered by the Taxicab, Limousine and Para transit Association to improve their interaction with customers. In addition, require stricter background checks on drivers to promote greater customer safety
- Mandate that all cars be equipped with equipment to receive payments by credit card. This will not only act as a convenience for customers, but a cashless system is less likely to lead to theft or disagreements between driver and passenger.
- Mandate that all new vehicles be equipped with back seat credit card swipe devices to entirely remove the driver from the payment system. The City of Chicago is one of the cities that have recently mandated this technology to greatly reduce fraud on the part of some drivers.
- Eliminate the requirement to mandate 40 inches of leg room in all cars. This provision is onerous and there is no evidence that the public is demanding such a change.
- Eliminate the provision that allow new "owner/operator" permits to be operated by an "employee" of the permit holder. This provision is almost impossible to regulate and will only lead to wide-spread non-compliance. Nation-wide the taxicab business is one in which cabs are either driven by the owner or leased to operators. New "owner/operator" permits should be limited to use by only the owner.
- Amend the uniforms provision to allow that uniforms match the color of the taxicab company for which cars are affiliated (yellow shirts for yellow cab, etc.).
- Amend ordinance to allow current permit holders to lease permit only to a person who would then put their own car on the road and provide the insurance, maintenance and related expenses on his/her own (would allow permit holders to offer less expensive lease options to drivers).
- Reserve at least half of the 50 new permits for operation in specific geographic areas in which the city is underserved. Much has been said about the glut of cabs downtown and the lack of service in neighborhoods. In order to help promote service in the neighborhoods half the new "owner/operator permits should be limited to north side, south side or west side service. This concept has operated successfully in Los Angeles, Chicago, New York and Las Vegas as well as other cities around the country.
- Provide a system by which military veterans receive preference in the lottery for any new permits. This tradition has been used in Milwaukee in the past and allows us to recognize the difficult employment situation with our returning troops.
- Presently, cab dispatch companies serve as the initial complaint departments for customers who have had issues. Since these 50 new permit holders will not be company affiliated a new customer complaint board or system should be established for the benefit of taxicab customers.

Please feel free to contact the undersigned with any questions or requests for further information and assistance.

Very truly yours,



Richard "Red" Christensen, Director

cc: Ald. Robert Puente  
Ald. Joe Davis, Sr  
Ald. James Bohl  
Ald. Robert Bauman