



July 13, 2015  
Via Electronic Mail

Independent Regulatory Review Commission  
333 Market Street, 14th Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

James R. Ney, Director  
Taxicab and Limousine Division  
2415 S. Swanson Street  
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Dennis G. Weldon, Esq., General Counsel  
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Philadelphia, PA 19106  
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**RE: Philadelphia Parking Authority Proposed Regulation #126-11: Modern Taxicab Standards**

Dear Members of the IRRC, Mr. Weldon, and Director Ney,

I am writing on behalf of the United Spinal Association and its members in full support of the Philadelphia Parking Authority's Proposed Regulation #126-11. The regulation would require all medallion taxicabs placed into service after a designated date to be wheelchair accessible. The regulation would dramatically increase and improve access to vehicle-for-hire service as only .5% of the current fleet is accessible. Providing a fully accessible demand responsive service would have an enormous and beneficial impact on the City of Philadelphia, allowing for greater contribution of its residents with temporary and permanent disabilities. United Spinal Association can think of no better way to mark the 25<sup>th</sup> Anniversary of the Americans with Disabilities Act.

Founded in 1946 by paralyzed veterans, United Spinal Association is the largest disability-led nonprofit organization serving and representing the interests of more than a million Americans living with spinal cord injuries and disorders. United Spinal Association has dedicated its energy, and programs to improving the quality of life for these Americans of all ages and advancing their independence. United Spinal has a long history of advocating for equal access to transportation, including advocating for increased fleets of accessible taxis and transportation network companies in New York City and the District of Columbia.

The proposed rule would make a considerable difference in the lives of city residents and visitors with disabilities. Adults with disabilities are more than twice as likely as those without disabilities to have inadequate transportation (31 percent versus 13 percent). Accessible vehicles for-hire providing demand responsive service can address this gap in access, providing needed transportation options to work, school, religious and social activities, and can be invaluable during inclement weather, a personal, or local emergency.



**United Spinal  
Association**

[www.unitedspinal.org](http://www.unitedspinal.org)

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United Spinal appreciates your commitment to provide transportation options to your residents and visitors with disabilities. Our members who reside in, and who visit Philadelphia for personal pleasure and business will benefit greatly. Please do not hesitate to contact Carol Tyson at United Spinal's policy office with any questions at (202) 556-2076, ext 7104 or [ctyson@unitedspinal.org](mailto:ctyson@unitedspinal.org).

Sincerely,

James Weisman  
President & CEO  
United Spinal Association