

United Spinal Association

Public Comment

Submitted by

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For the

DC Taxicab Commission

Government of the District of Columbia

Regarding

Accessible Vehicle-For-Hire Service and H-Tag Provision

July 8, 2015

Acting Chairman Chrappah, and other distinguished members of the DC Taxicab Commission (DCTC), thank you for the opportunity to offer public comment regarding accessible vehicle-for-hire service in the District.

My name is Carol Tyson. I am the Director of Disability Policy for United Spinal Association. Founded in 1946 by paralyzed veterans, United Spinal 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. People with disabilities who reside or work in the District, or who visit our nation's capital, must have equal access to all transportation options, including taxis and transportation network company (TNC) service.

I would first like to thank the Commission, taxi companies, and operators for their efforts to provide accessible taxi service in the District. Let there be no question, each additional accessible taxi on the road provides life-changing service to wheelchair users – granting convenient, and at times the only available, transportation to work, school, appointments, and arts and culture. Accessible taxis provide back-up transportation when Metro elevators are broken, during inclement weather when accessing public transportation may be difficult, or late at night when public transportation is no longer running. Accessible taxis allow people with disabilities to participate in, and contribute to everyday life. Accessible transportation ensures that each and every one of us, and those we care about, can remain active should we find ourselves living with a temporary or permanent disability.

United Spinal is grateful for the DCTC's recent announcement that it will enforce, to the full extent of the law, the requirement that 6% of all companies' fleets are comprised of accessible vehicles. The enforcement sends a strong message to the industry, but also to residents, visitors, and the entire nation, that accessibility is a priority in the District. This is the right message on the 25th Anniversary of the Americans with Disabilities Act. However, United Spinal is concerned that drivers for these companies may pay the price of losing their jobs for decisions made by company leadership. In addition, non-compliance by the 20 companies leads to the loss of at least 20 additional accessible taxis on the streets.

It is United Spinal's understanding that there are drivers and individuals who would want to establish new taxi companies, who would like to provide accessible service. We understand also that new tags to operate vehicles are not being released so that existing taxi companies and drivers can remain competitive. A study undertaken for the commission concluded that 200 additional tags on top of the existing numbers could be allotted without causing harm to the market. United Spinal recommends tallying the number of taxis in non-compliant companies, releasing that number of tags, plus the 200, to independent drivers and new associations willing to provide accessible service. The tags could be distributed first to those who have driven most recently, or who had tags in the past, then to new companies that run an entirely accessible fleet.

We urge the Commission to consider establishing a fund to support independent drivers and companies purchase and maintenance of accessible vehicles. Should the DCTC set up such a fund the DC Council could establish additional sources for such a fund.

Finally, United Spinal recommends that the Commission maintain a list available on its website of operators and dispatch services that provide wheelchair accessible service. In the event that a wheelchair accessible taxi is not available upon request, passengers could be referred to the list. This list would be useful for District residents and visitors who are unaware that accessible taxi service is available. In addition, we encourage the Commission to ensure that all operators and companies are complying with training requirements. We recommend the Commission work with the Office of Disability Rights to create online and in-person (when needed) training programs as soon as possible.

United Spinal thanks the Commission for its efforts to ensure accessibility to vehicle-for-hire service in the District. We are eager to continue to work in partnership with all stakeholders. We will continue to advocate for an accessible fleet (both public and private) that will benefit drivers and all who visit, live in, and work in the District.