

United Spinal Association

Public Comment

Submitted by

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For the

DC Taxicab Commission

Government of the District of Columbia

Regarding

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

September 9, 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.

I would first like to thank the Commission, taxi companies, and operators for their efforts to provide accessible taxi service in the District. Accessible transportation ensures that each and every one of us, and those we care about, can remain active, working if we so chose, and participating in our communities should we find ourselves living with a temporary or permanent disability.

United Spinal thanks the Commission for its commitment to ending discrimination in the vehicle-for-hire industry, and continuation of the Anonymous Riders Program. Thank you for providing the report during the August public meeting. Report findings, however, were startling. Persons with disabilities who participated in the program were passed up by drivers 30% of the time. We would ask the Commission to take immediate steps to ensure no potential riders in the District need to question whether a driver will stop to provide service. We note that there is now a discrimination complaint form on the DCTC website. Thank you. We recommend that, if it is not already procedure, testers for the Anonymous Riders Program be given the opportunity to file a discrimination complaint if they feel it is warranted. We recommend, also, ensuring that all discrimination-based complaints continue to be submitted to the DC Department of Human Rights (OHR) so that District residents and visitors' rights under the DC Human Rights Act can be upheld. We recommend adding language to the Commission website and complaint form that lays out the process for suspected discrimination by a private vehicle-for-hire operator or company as well. We note that passengers may file a discrimination complaint for taxi and private vehicle-for-hire service through OHR. Finally, we are concerned with the recent waiver of company liability to discrimination complaints. This action sets a potentially dangerous precedent given the high numbers of private vehicle-for-hire operators in the District.

United Spinal thanks the Commission for its release of Transport DC expansion grant funds. Anecdotal accounts and the press, however, report that not all vehicles are in active service. It may be difficult to find willing drivers. United Spinal urges the Commission to consider adopting creative solutions to allow existing drivers who live in Maryland or Virginia to apply for grants, and to work with companies who may be having difficulty identifying drivers to place accessible taxis on the street. To incentivize companies and individual drivers to replace sedans with accessible taxis, we recommend an age out requirement for accessible vehicles that is equivalent, if not greater, than a private vehicle-for-hire. We note that currently a wheelchair vehicle with CNG may be kept in service for 12 years, but there are, to our knowledge, no existing CNG fueling stations.

United Spinal thanks the Commission for its rulemaking implementing the Vehicle for Hire Innovation Amendment Act of 2014. The Act contains necessary anti-discrimination provisions that level the playing field for public and private vehicles-for-hire.

Thank you for making the list of companies providing wheelchair accessible taxi service available on your website. We have shared the list and the Transport DC central dispatch number widely in the community in the past month and will continue to do so. We support the Commission's continued marketing of the Transport DC program. We continue to recommend a broad public awareness campaign that lets District residents and visitors who are chair users know that taxi service is now an option. Higher demand will ensure trips for drivers who are stepping up to fill the gap in equitable service.

Finally, United Spinal notes the findings of the Panel on Industry regarding the release of H-Tags. We support the release of nearly 200 additional tags and recommend that these tags be for the operation of accessible vehicles given the significant need for accessible service. At the most, 1.5% of the public vehicle-for-hire fleet is accessible while 0% of the private vehicle- for-hire fleet is accessible to people with significant disabilities.

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