



MEMO / NOTE DE SERVICE

To / Destinataire	Christine Hartig, Program Manager, Operations Support and Regulatory Services, By-Law and Regulatory Services Emergency and Protective Services	File/N° de fichier:
From / Expéditeur	Chair, Accessibility Advisory Committee	
Subject / Objet	On-Demand (Wheelchair) Accessible Taxicab Service Study Options to Improve Service	Date: December 20, 2021

I thank you again for your presentation to the Accessibility Advisory Committee (AAC) on November 16, 2021, about Ottawa's On-Demand (Wheelchair) Accessible Taxicab Service Study.

I am writing to provide additional comments on behalf of the AAC, in addition to the comments that were provided to you during the question-and-answer portion of your presentation.

Core Principles

Before discussing which incentive options the AAC feels are most appropriate, I want to first outline important considerations that the AAC feels are central to the issue you are undertaking.

First, the provision of on-demand accessible taxicab services in Ottawa is essential to the full inclusion of disabled residents and visitors. No matter what incentive option is chosen, the City must ensure that adequate service levels are maintained.

Second, the AAC feels that the City has a special responsibility to resolve the challenges presented to the provision of on-demand accessible taxicab services due to the licensing of Private Transportation Companies (PTCs). Ottawa chose to license PTCs and it also chose to allow PTCs not to provide wheelchair-accessible service in Ottawa. Regardless of City Council's intent in doing so, it is evident that the decision to not impose accessible service requirements on PTCs has had a negative impact on disabled residents of our City by reducing their private transportation options and destabilizing the accessible taxicab industry. The responsibility for this falls squarely with the City as the regulator of private transportation services.

Third, The AAC continues to believe that any private transportation provider in Ottawa, whether a PTC or taxicab, should be required to provide services that are accessible to disabled clients who use wheelchairs and other mobility devices. Anything short of this creates an unequal playing field for disabled residents and visitors and simply sustains the presence of systemic Ableism in our City. After all, no one would license a private transportation provider that was unable to provide safe, reliable service to non-disabled persons. Why then should disabled persons expect a different standard?

Finally, I understand that changing the Voluntary Per-Trip Surcharge paid by PTCs for not providing accessible services is not part of the scope of your study. Nevertheless, the AAC takes this opportunity to express, as it has before, that a per-trip surcharge is not a solution to the challenges facing the accessible taxicab industry.

Incentive Option Assessment

The AAC understands the City's past decision to require that all new taxi plates in Ottawa be issued to accessible vehicles only. This should not change. At the same time, the AAC recognizes that this imposes costs on a taxicab operator that are not incurred by PTC operators – the cost of retrofitting a vehicle to accommodate persons using mobility devices, as well as the cost of running and servicing such a vehicle. We understand that these costs are in the tens of thousands of dollars.

Prior to the licensing of PTCs, this cost was common to every regulated player in the taxicab market. However, post-PTC licensing, only taxicab operators have to bear these costs; PTC operators do not (since they are permitted by the City not to serve disabled persons).

This reality places disabled residents and visitors in a very vulnerable position because of the real risk that accessible taxicab operators will no longer see a profit to be made in providing their service. Why would an accessible taxicab operator continue to do business in Ottawa when they could become a PTC operator and be more profitable?

Keeping all of this in mind, the AAC makes the following comments on the Incentive Options Assessment you provided.

An Annual Grant: this seems to be the only option that explicitly recognizes that taxicab operators face higher costs in order to participate in Ottawa's taxicab market and serve disabled residents and visitors. If the inequity between accessible taxicabs and PTCs is to be maintained, then an annual grant should be provided to taxicab operators, including the plate holder and drivers, if they incur costs. In our view, the proposed amount is woefully inadequate.

Annual Incentive, Per Trip Surcharge, Enhanced Driver Training: in our view none of these options are appropriate, as they fail to address the reality that taxicab operators face higher costs

simply to operate in the market. In addition, neither option seems to provide enough of an incentive to continue providing services in a municipality that also has PTCs.

Centralized Dispatch: Regardless of whatever incentive option is implemented, the AAC feels that a centralized dispatch should also be implemented, as it would significantly increase the quality of service provided to disabled residents and visitors who need an accessible taxicab. This would reduce the burden on disabled customers by improving booking options and by also providing better tracking of ride requests to ensure that accessible taxicab requests are not being declined by operators (in favour of a non-accessible ride request).

Recognizing the Costs of Providing an Accessible Service

In order to level the playing field for accessible taxicab operators, and in order to ensure the continued presence of this service in Ottawa, the AAC feels that the City should cover the costs of retrofitting a taxicab to make it accessible, as well as the administrative costs related to the transfer of accessible taxi plates.

We thank you again for the opportunity to comment on your study.

Phillip B. Turcotte,
Chair, Accessibility Advisory Committee

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