

Summary of KPMG's Recommendations

This document summarizes the recommendations outlined by KPMG in its final report related to the Taxi and Limousine Regulation and Service Review and provides the rationale for the acceptance of, agreement in principle with, or rejection of a particular recommendation in the staff report and proposed by-laws for consideration by Council.

KPMG proposed 70 recommendations, 96% of which staff was in favour. Specifically, staff accepted 60 (86%) recommendations, agreed in principle as amended with 7 (10%), and did not accept 3 (4%).

NOTE: KPMG refers to Transportation Network Companies (TNCs) whereas the City prefers the term Private Transportation Companies (PTCs)

#	KPMG Recommendation	Action	Rationale for staff action
Strategic Directions			
1	That a new licensing category of Transportation Network Company (TNC) be created (page 8).	Accepted	Establishes a regulatory framework to allow Private Transportation Companies (PTCs) to operate legally in Ottawa subject to specific licensing requirements and conditions. Allows other PTCs to establish themselves, permits customers to continue receiving the services they have come to enjoy, while fostering continued innovation in a competitive environment.
2	That the existing taxi and limousine regulatory framework be reformed to reflect emerging issues, new technologies and non-traditional service models (page 8).	Accepted	Fosters innovation, enhances competitiveness and modernizes regulation to reflect emerging issues, new technologies and non-traditional service models.
3	That the existing taxi and limousine regulatory framework be simplified (page 8).	Accepted	Eliminates out dated and seldom used provisions and enhances competitiveness.

#	KPMG Recommendation	Action	Rationale for staff action
Insurance			
4	Require \$2 million of liability insurance coverage, approved by FCSO, for all providers of vehicle-for-hire services; including TNCs, taxis and limousines (page 11).	Amended	Agreed in principle. Staff, on the advice of the City of Ottawa's insurance broker and an external senior insurance consultant, is recommending that a minimum of \$5 million commercial general liability insurance coverage together with the applicable motor vehicle insurance be required across all categories of vehicles-for-hire to ensure adequate coverage due to an increase in claims experienced generally. Also require PTC to ensure that all PTC Drivers obtain and maintain automobile insurance for part-time drivers carrying passengers for compensation, with \$5 million limit.
5	Require all vehicle-for-hire providers, including limousine operators, TNC licensees, and taxis brokers to ensure all vehicles and drivers operating under or affiliated with their licenses have qualifying coverage, subject to penalty where this is not the case (page 11).	Accepted	Supports recommendation #4 above and ensures public safety and consumer protection.
6	Proof of insurance must be provided before licenses are issued and also immediately upon request by City officials (page 11).	Accepted	Supports recommendations #4 and #5 above and ensures public safety and consumer protection.
Driver Screening			
7	Any drivers of a taxi, TNC or limousine require a Police Records Check for the vulnerable sector and a Statement of Driving Record before commencing service and annually thereafter (page 12).	Amended	The recommendation is accepted for PTC and limo drivers, given the more transient nature of the drivers affiliated with those services, and accepted in principle for taxi drivers. Staff recommends that taxi drivers continue to be required to provide a Police Records Check for work in the vulnerable sector before commencing service and every three years thereafter, in addition to a waiver annually, as is presently the case.
8	Require that all vehicle-for-hire providers,	Amended	The recommendation is accepted for PTC and limo drivers,

#	KPMG Recommendation	Action	Rationale for staff action
	be responsible for verifying that the conditions for the vulnerable sector Police Record Check and Statement of Driving Record are met, retaining records to demonstrate during audit that the conditions are met, subject to penalty where this is not the case (page 12).		who will be required to provide acceptable PRCs for Vulnerable Sector for verification by the PTC or limousine service provider, based on criteria provided by the City. However the City will continue to verify the conditions for Police Record Check and Statement of Driving Record as a requirement for issuance/renewal of a Taxi Driver License.
9	The Chief License Inspector establish criteria for unacceptable results for the Police Records Check and for the Statement of Driving Record (page 12).	Accepted	The Chief License Inspector will formalize and review criteria applicable to all drivers as required.
Vehicle Age and Inspection			
10	Taxi brokers, TNCs and limousines operators establish their vehicle standards for the size, age, features and cleanliness of vehicles, provided that in no case may vehicles be 10 or more model years old (with exceptions for the classic or vintage category of limousines), or have an odometer reading of greater than 300,000 kilometers, and provided that only wheelchair accessible vehicles may be used with accessible taxi plates (page 13).	Accepted	Agreed in principle. The maximum age for all vehicles-for-hire will be set at 10 years (except classic, vintage and speciality limousines) as public safety is assured through routine inspections by By-law Officers, annual safety certificates and biannual inspections of vehicles older than 5 model years. The 300,000 km limit is problematic, particularly for taxicabs driven full-time. Rather, the Chief License Inspector will disqualify a vehicle if it is deemed unsafe, in the interest of public safety.
11	Taxis not affiliated with a taxi broker must also be less than 10 model years old and have an odometer reading of no greater than 300,000 kilometers and must meet current by-law requirements concerning acceptable sizes and features of vehicles (page 13).	Accepted	Agreed in principle however, all taxicabs are required under the by-law to be affiliated with a broker, so this recommendation is not applicable.
12	Annual Safety Standards Certificates from a Ministry of Transportation licensed	Accepted	The requirements serve to protect public safety by ensuring that only vehicles deemed fit by a licensed inspection

#	KPMG Recommendation	Action	Rationale for staff action
	garage required for all vehicles operating as a vehicle-for-hire. Bi-annual Certificates be required for vehicles over 5 models years old which log more than 30,000km a year. TNCs and taxi brokers be required to ensure any vehicles affiliated with their service receives the required inspections and to maintain records of the safety inspections (page 13-14).		station are permitted to serve customers. The twice per year inspections will help ensure the safety of older vehicles that are used full-time as vehicles-for-hire. The 300,000 km limit is problematic, particularly for taxicabs driven full-time. Rather, the Chief License Inspector will disqualify a vehicle if it is deemed unsafe, in the interest of public safety.
13	TNCs and taxi brokers be required to demonstrate to the satisfaction of the Chief License Inspector that the meters or approaches used to determine a fare is accurate and consistent with published fare information (page 14).	Accepted	Supports consumer protection. The meter system will be maintained for taxis but alternative approaches (e.g. apps) will be also be permitted.
14	New styles of meters will require approval from the Chief License Inspector (page 14).	Accepted	Supports consumer protection.
15	Taxis unaffiliated with a broker be required to attend an annual meter inspection (page 14).	Accepted	Agreed in principle however, all taxicabs are required under the by-law to be affiliated with a broker, so this recommendation is not applicable.
Vehicle Identification			
16	Taxis be required to be marked and have a roof light (page 15).	Accepted	Marked taxicabs with a roof light allow customers to identify a taxicab when hailing or using a taxi stand and supports public safety.
17	Vehicles operating as a TNC or limo be prohibited from having vehicle identification (page 15).	Accepted	PTCs and limousines will not be permitted to have vehicle identification, as these business models do not involve the use of taxi stands or street hails. The presence of vehicle IDs on PTC vehicles may also encourage unauthorized street hailing. Instead of having markings, customers receive a description of the vehicle and plate number upon booking a ride through the PTC app which helps to identify the vehicle. Similarly, when a limousine is booked, the

#	KPMG Recommendation	Action	Rationale for staff action
			customer is given a description of the vehicle at that time or the driver calls upon arrival.
18	TNCs be required to have an app that can be used by By-law enforcement officials so that TNC vehicles can be readily identified for enforcement purposes (page 15).	Accepted	Supports public safety and consumer protection considerations, and to facilitate enforcement.
Cameras in Vehicles			
19	Cameras be optional for any vehicle operating through a TNC or a limousine operator (page 15).	Accepted	Vehicles operating under a PTC only accept pre-arranged rides arranged through an app. Pre-arranged rides where information of both parties is shared between parties adds a level of security that does not exist otherwise. Similarly, limousines primarily operate on a basis of pre-arranged rides. City will not regulate the presence of cameras in PTC vehicles or limousines as it would be the choice of the driver.
20	Cameras continue to be a requirement for taxis, which are able to accept street hails or use taxi stands (page 15).	Accepted	Taxis pick-up unknown persons on the street by accepting street hails and at taxi stands. Cameras add a measure of protection for both the driver and the passenger where other such protections do not exist.
21	Chief License Inspector should update specifications of in-camera vehicles to incorporate current technologies (page 16).	Accepted	Minimum camera specifications as opposed to a camera make and model should be regulated to provide the purchaser choice when purchasing the camera, which may reduce cost, or may allow for a better camera to be purchased. Minimum standards establish a standard of quality to be achieved to provide for public protection.
Accessibility			
22	All taxi brokers, limousines, and TNCs with more than 25 affiliated vehicles be required to provide 15% or more of the hours of service provided by affiliated vehicles in accessible vehicles (page 17).	Amended	Agreed in principle, in that the recommendation supports accessible transportation service. The taxi industry is currently 16% accessible and all new taxi plates issued in the future must be accessible to ensure accessible service is maintained. For PTCs, there is no ability to accurately monitor this requirement given the numbers of affiliated

#	KPMG Recommendation	Action	Rationale for staff action
			vehicles, and the ebb and flow of part time vehicles active at any given time. None of the licensed limousine operators currently have more than 25 affiliated vehicles and given the nature of these specialized vehicles, this recommendation is not applicable.
23	Taxi brokers, limousines, and TNCs be required to contribute \$0.30 per trip to fund an Accessible Services Support Fund as an alternative to the requirement that 15% of their service be accessible (page 17).	Amended	Agreed in principle. While staff accepts the recommendation of implementing a surcharge for PTCs (see #22), the City does not currently have the authority to charge such an accessibility levy as a mandatory requirement. Although staff is seeking Council's direction to petition the Province for enabling legislation to establish a mandatory accessibility levy for PTCs, staff recognizes that this approach will take time. In the interim, staff has recommended that the City work with the PTCs that it is licensing to put in place a voluntary per-trip surcharge that would, as a good faith gesture, see PTCs partnering with the City to support accessible transportation service.
24	That funds in the Accessible Services Support Fund be used to fund contributions to operators of accessible vehicles-for-hire to contribute towards the costs of purchasing and operating accessible vehicles and make the operation of accessible vehicles-for-hire more economically viable and competitive (page 17).	Accepted	Staff will work with the City's Accessibility Unit, the Accessibility Advisory Committee, Para Transpo and other internal and external stakeholders to develop a strategy with respect to how new funds generated through an accessibility levy could be used to offset costs for a number of programs supporting accessible transportation, including but not limited to enhancing the taxi coupon program, and report back to Council with a recommended approach.
25	That all TNCs and taxi brokers include features in their apps that will improve accessibility for blind, low vision, deaf or hard of hearing persons to the extent possible, as approved by the Chief License Inspector (page 17).	Accepted	Accepted that all apps should include accessibility features to the extent possible, however there are no mandatory requirements. Rather than define the specific requirements in regulations, it is suggested that the Chief License Inspector review the provisions so that there is some flexibility to adopt new approaches (and requirements) as

#	KPMG Recommendation	Action	Rationale for staff action
			they become available.
26	Taxis make any new meters talking meters (page 17).	Not Accepted	As described above, agreed in principle that all service providers with meters should implement accessibility features to the extent possible as new technologies become available on an optional basis.
27	A minimum of 15% of any new taxi licenses issued be accessible licenses (page 18).	Accepted	Agreed in principle. For taxis, the by-law requirement exceeds this minimum. All new taxi plates must be accessible and, currently, the industry is at 16% accessible.
28	That Para Transpo expand its service delivery using contracted accessible taxis and through expansion of its taxi coupon program as additional capacity is required (page 18).	Accepted	Recommendation will form part of the staff consultation described at recommendation #24 with the implementation of the accessibility levy to allow for expansion of services.
Fare Pricing			
29	Continue to have a taxi fare specified in the by-law (page 21).	Accepted	Variable pricing is difficult to apply to all parts of the taxi industry, such as street hails and taxi stands, so the concept of a fixed or maximum price is important for consumer protection.
30	Permit variable pricing be employed by taxis affiliated with a particular taxi broker provided the Chief License Inspector has been notified of the pricing approach, determined that the meter and related systems can reliably implement the variable pricing approach, and approved the approach to customer notification and acceptance of the fare to be charged (page 21).	Accepted	Agreed in principle. The proposed by-law allows licensed taxi brokers to reduce their fares below the maximum fare specified in the by-law, subject to notification and approval by the Chief License, to enable the taxi industry to complete with app-based market and to ensure that the variable pricing approach is reliable and transparent to the consumer.
31	The by-law rate shall be the maximum permitted charge for all fares initiated by taxis at taxi stands or hailed on the street (page 21).	Accepted	Variable pricing is difficult to apply to all parts of the taxi industry, as customers generally have to take the first car in line at a taxi stand, so the concept of a fixed or maximum price is important for consumer protection.

#	KPMG Recommendation	Action	Rationale for staff action
32	Permit TNCs and their affiliated vehicles to use variable pricing provided the Chief License Inspector has been notified of the pricing approach, determined that the meter and related systems can reliably implement the variable pricing approach, and approved the approach to customer notification and acceptance of the fare to be charged (page 21).	Accepted	Agreed in principle. PTC will be required to ensure that the customer consents to the fare to be charged, however there is no requirement to notify the Chief License Inspector of the pricing approach. The requirement to notify the Chief License Inspector applies only to taxis as it is important for consumer protection and public safety that a regulated fare be applied in an environment where drivers are not known to customers (i.e. hails and the use of taxi stands).
33	Require all variable pricing regimes to include a requirement for the customer to consent to the fare prior to the service being provided (page 21-22).	Accepted	The guiding principle of “consumer protection” is addressed as customers will be informed and have the opportunity to consent or reject a ride on an informed basis.
34	Increase the minimum fare charged by limousines, except for a new class of limousine providing “auxiliary services” (page 22).	Accepted	Restores a gap between limousine fares and taxi fares, factoring in inflation, and the physical growth of the city to ensure that there is an appropriate distinction between the premium fare charged by luxury limousines versus regular taxicabs.
Complaint Resolution Process			
35	Require taxi brokers, TNCs and limousine operators to establish and implement a complaint resolution process, with prescribed minimum features (page 23):	Accepted	Agreed in principle. The City will continue to administer a complaint resolution process for taxis and limousines in the interest of public safety and consumer protection. The PTC model is based on the presumption of ‘buyer beware’ risk assignment between passenger and driver and, as such, all routine PTC-related complaints will be handled by the PTC.
36	Refer any major issues such as sexual assaults, assaults or robberies to the police immediately and to By-law & Regulatory Services in a timely manner (page 23).	Accepted	Staff agrees that significant issues will be escalated to By-law & Regulatory Services and Police, as applicable.
37	Define timelines for initial contact with the driver and passenger or other parties involved in the complaint, and for resolution	Accepted	See #35 - supports public safety and consumer protection.

#	KPMG Recommendation	Action	Rationale for staff action
	of the complaint (page 24).		
38	Inform complainants of their right to raise their concern with the regulator through By-law & Regulatory Services if the complaint alleges a breach of a by-law (page 24).	Accepted	See #35 - supports public safety and consumer protection where there is a violation of the by-law.
39	Track complaints and report monthly on the number of complaints by type, and the resolution (page 24).	Accepted	See #35 - supports public safety and consumer protection.
Vehicle Requirements			
40	Size requirements for taxis be set by the broker, taking into account the market segments they target (page 24)	Accepted	In a competitive environment, taxi brokers will consider the needs of their customers and the service provided by their competitors when setting vehicle standards. Further, the ability to use smaller vehicles than what are currently required may result in more fuel-efficient and less costly vehicles being used, which could lower the overall costs for the taxi industry. Customers with accessibility issues who require larger vehicles will continue to have access to accessible taxicabs.
41	Size requirement for TNC vehicles be set by TNCs (page 24).	Accepted	Customers will receive a full description of the vehicle that will be used for the trip and will have the ability to rate the vehicle in the app, which has the potential to drive demand in the types of vehicles used.
42	Limousines in the luxury or stretch category shall have a MSRP of greater than \$60,000, to be adjusted for inflation (page 24).	Accepted	Agreed in principle. The current definition of a “luxury” vehicle suitable for limousine service is met by the majority of cars sold today. However, using the manufacturer’s suggest retail price tied to inflation may be difficult to establish, particularly when operators purchase a used vehicles, and does not necessarily ensure the vehicle would be considered “luxury” by the passenger as more technical vehicle features can impact the retail price. Rather, staff will refine the definition of limousine and realign vehicle features to ensure vehicles are “luxury” and

#	KPMG Recommendation	Action	Rationale for staff action
			are distinguished from other vehicles-for-hire.
43	Limousines in the classic or vintage category shall meet such criteria as the Chief License Inspector may establish related to their age and condition (page 24).	Accepted	Vintage and/ or classic vehicles will be incorporated into the definition of a luxury limousine and will be subject to the same requirements with the exception of vehicle age and condition, as recommended.
44	Limousines in the auxiliary service category shall be appropriate to their intended use and shall only be licensed if the Chief License Inspector determines that their use as a vehicle-for-hire is ancillary to other services being provided (page 24).	Accepted	An auxiliary service category will be established under the by-law, with the same driver screening and insurance requirements as luxury limousines. Auxiliary services will include personal service related transportation, such as senior citizen accompaniment, and personal vehicle chauffeur services, which drive the client home in the client's car (e.g. responsible choice). There would be no per vehicle license fee or minimum fares associated with auxiliary services as their use as a vehicle-for-hire is ancillary to other services being provided
Apps			
45	Require that every taxi broker and TNC have an app with at least the following features: driver rating, driver information, vehicle information, vehicle location, route tracking and automatic in-app payment through credit or debit card (page 26).	Amended	Agreed in principle, with respect to app features. Many of KPMG's recommendations are predicated on the full feature app requirement for both taxis and PTCs as these features (i.e. driver rating) will allow customers to drive demand in areas such as vehicle requirements (i.e. age of vehicle, vehicle and service standards). Staff agrees that a mandatory requirement is essential for PTCs as this is a fundamental aspect of their business model. With respect to taxis and limousines, while adoption of apps makes good business sense, and the taxi industry is already moving in that direction, staff does not believe that such a requirement should be mandatory given that taxis and limousines already have regulated mechanisms in place to meet the essential elements set out in the KPMG recommendation.

#	KPMG Recommendation	Action	Rationale for staff action
Dispatching			
46	Both TNCs and taxi brokers be required to accept calls for service through an app (page 27).	Accepted	Agreed in principle. This would be an optional specification for taxis (see #45).
47	Taxi brokers be required to accepts calls for service by telephone (page 27)	Accepted	Customers who do not own or feel comfortable using a cell phone would still have the ability to book a taxi by telephone.
48	TNCs and taxi brokers to dispatch (or offer) the vehicle that can respond quickest to the customer, with any limitations on this principle subject to approval by the Chief License Inspector (page 27).	Accepted	Agreed in principle. KPMG identified that long wait times were a common complaint of taxi users. Wait times would be reduced if the closest available vehicle was dispatched as opposed to the current system which primarily operates as a queue of drivers who are logged into a particular area. This is a business decision for the taxi industry, which is encouraged to adopt this service delivery model.
49	That both taxis and TNCs have a logical connection between the meter or other fare calculation process and the dispatch system which matches customers to vehicles (page 27).	Accepted	The suggested requirement of a connection of the meter to the dispatch system would reduce wait time as vehicles would only be assigned to a new call when they are free.
Payment Options			
50	Eliminate the \$1.50 credit card charge (page 28).	Accepted	During the consultation process, customers expressed concern regarding this fee as payment by credit card is a common occurrence and the surcharge adds to the cost of the fare which when applied makes Ottawa's taxi fare rates the highest in Canada. The six other jurisdictions reviewed in KPMG's Case Studies discussion paper had no similar fee.
51	Taxis, drivers operating through a TNC, and limousines must accept credit card and debit payments through an app (page 28).	Accepted	These are standard payment options which customers have come to expect.
52	Taxis must accept cash and TNCs must be prohibited from accepting cash (page 28).	Accepted	Accepting payment by cash is part of the business model of taxis and is not part of the business model for PTCs. Cash

#	KPMG Recommendation	Action	Rationale for staff action
			payments should remain in the exclusive domain of the more highly regulated taxi industry where safeguards, such as in-vehicle cameras are required for the safety of both passenger and the taxi driver. The decreased risk of theft associated with non-cash transactions is one of the reasons why staff is not proposing mandatory cameras in PTC vehicles.
Geographic Limits			
53	The regulated area for taxi licensing be expanded to include the entire City of Ottawa (page 30).	Accepted	Application of licensing by-laws to vehicles-for-hire operating City-wide ensures public safety, consumer protection and accessibility.
54	TNC licensing apply to the entire City of Ottawa (page 30).	Accepted	Application of licensing by-laws to vehicles-for-hire operating City-wide ensures public safety, consumer protection and accessibility
Plates			
55	Enact a by-law formula of one taxi plate holder license per 806 Ottawa residents in the short term (page 30).	Accepted	The one taxi plate-per-806 residents' formula would match the current supply to the population of the City. The proposed formula continues to facilitate issuing more plates to cover future growth.
56	Require taxi brokers and TNCs to provide data concerning calls, dispatches and trips that will allow analysis of industry service levels (page 30).	Accepted	Some of this data (e.g. trip data) is necessary to calculate the City fee formula for the portion of the fare that will be remitted to the City. With the availability of more extensive aggregate data from current dispatch systems, it would be possible to conduct analysis of vehicle-for-hire service levels in a meaningful way and, by extension, assist with transportation and public transit planning.
57	Once baseline service levels have been established, issue additional taxi plates if and when warranted to maintain target service levels (page 30).	Accepted	Currently, the formula is based on per capita population statistics (see #55). However, with the introduction of PTCs resulting in an increase in supply, plate issuance should no longer be based solely on population but should also consider demand for service. This issue will require further review by staff.

#	KPMG Recommendation	Action	Rationale for staff action
License Fees			
58	Charging TNCs a licensing fee that is equal to the taxi broker fee, plus the equivalent of the taxi driver and taxi plate renewal fees, calculated on a per fare served basis, as shown in Appendix B (page 31).	Accepted	Staff agrees with this recommendation to ensure that the revenues received from PTCs captures the administration and enforcement costs associated with regulating PTCs.
59	Provide an option that taxi drivers may pay their renewal fee either as a fixed annual amount, or as a charge per fare served, in order to facilitate part-time vehicle-for-hire operation (page 31).	Accepted	Agreed in principle, although, given the current taxi driver license fee and the expected number of fares served (trips) annually, the fixed renewal fee would predominantly be less expensive for drivers, and therefore, staff will not implement this recommendation. Rather, in recognition of the regulatory shift and the increase in license fees that would be expected through the new PTC license category, staff is recommending a corresponding reduction in the standard taxicab driver license fee and waiver of the accessible taxicab driver fee, as outlined in the staff report.
60	Reducing the taxi plate transfer fee to the same amount as an annual plate renewal fee (page 31).	Not accepted	Taxi plate transfer fees require significant staff time to administer and review and often require significant legal support and can take considerable periods of time to resolve.
Training			
61	Eliminate training requirement in the Taxi By-law, except as they relate to courses for drivers of accessible vehicles (page 32).	Accepted	Way finding training has traditionally constituted a large piece of driver training. With the advent of GPS, drivers no longer need to rely on in-class training and the use of printed maps to facilitate the efficient transport of passengers. Staff agrees that training, except for the practical training of drivers of accessible vehicles, could be eliminated.
62	Require that taxi brokers and TNCs provide training to their drivers before they begin service (page 32).	Accepted	It is understood that PTC and taxi drivers will still need some basic training on the use of of GPS systems as well as the fundamentals of their particular business models and

#	KPMG Recommendation	Action	Rationale for staff action
			rules of the services with which they are affiliated as well as the importance of customer service including key legal and human rights issues, but staff agree that this training can be provided outside of the scope of the by-law.
63	Review the contents of the accessible training course and consider merging delivery with Para Transpo driver training (page 33).	Accepted	Accepted in principle. Staff will review all options for accessible training, which will include discussion with Para Transpo and the current accessible taxi training provider.
Enforcement			
64	Support provincial legislation allowing larger fines, suspension of drivers' licenses and assignment of demerit points for operating a vehicle-for-hire contrary to a municipal by-law (page 33).	Accepted	A consistent theme from consultations was the need for more aggressive, effective and widespread enforcement when taxi regulations are not being followed. The presence of Uber operations in Ottawa for the past year was frequently raised in this context. Tougher punishments for breach of the law will allow municipalities to more effectively enforce their by-laws, supporting public safety and consumer protection.
65	Give taxi brokers, TNCs and limousine operators responsibility to self-regulate in the following areas, subject to audit by the Chief license Inspector, compliance with: driver screening regulations, vehicle regulations (including camera requirements), insurance regulations, fare pricing and related meter and notice regulations (page 33-34).	Amended	Agreed in principle. With respect to PTCs, all rides are pre-arranged between identified parties with consumer consent, the proposed regulations for PTCs are therefore largely self regulatory with PTCs required to maintain necessary records for inspection. The taxi industry serves as an adjunct to the public transportation system, with designated stands, public street hailing and a strong accessible service component, the City will continue to play a significant role in the administration of taxicab licensing. Further, staff does not support self-regulation (see #66) but agrees that it is important to continue to inspect and/or audit vehicle conditions (including meters and cameras) and other requirements in support of consumer protection and public safety. However, inspections and audits cannot be undertaken in the absence of regulation.

#	KPMG Recommendation	Action	Rationale for staff action
66	Consider eliminating the requirement for taxi drivers' licenses once self-regulation mechanisms are in place (34).	Accepted	Agreed in principle. Staff does not support this recommendation in the short term as it could jeopardize public safety, consumer protection and accessibility. Staff could review in the future, if required, once self-regulation mechanisms are in place.
67	Develop a contingency plan for aggressive enforcement of TNC and taxi regulations in the event there are substantial operations in contravention of the by-laws (page 34).	Accepted	Staff will develop an enforcement plan as part of the overall implementation strategy to ensure compliance with the regulations as approved by Council.
Implementation			
68	The implementation of the full feature apps connecting meters to apps/GPS systems, and implementing the quickest response dispatching, should be completed within twelve months (page 35).	Not Accepted	Staff agrees that a mandatory app requirement with specific minimum features is essential for PTCs as this is a fundamental aspect of their business model. With respect to taxis and limousines, while adoption of apps makes good business sense, and the taxi industry is already moving in that direction, staff does not believe that such a requirement should be mandatory given that taxis and limousines already have regulated mechanisms in place to meet the essential elements set out in the KPMG recommendation.
69	The implementation timeline for self-regulation, and replacement of meters and cameras, should be determined following industry input (page 35).	Accepted	Agreed in principle. Staff does not support this recommendation in the short term as it would impact public safety, consumer protection and accessibility. Staff could review in the future, if required, once self-regulation mechanisms are in place.
70	Enact TNC regulations as soon as possible, with enforcement (page 35).	Accepted	Staff proposed to enact the by-law with an effective date of June 30, 2016 to ensure that staff has sufficient time to develop and implement the program.