## Petition of DC Taxicab Drivers Opposing the Proposed Amendments to Chapters 6 & 8 of Title 31

We, the undersigned licensed taxicab drivers in the District of Columbia sign this petition because we oppose the Taxicab Commission's Proposed Rulemaking for many reasons, some of which follow:

- 1. This proposed rulemaking was undertaken in violation of DC Law, as there were no "industry members [with] experience in taxicab operations in the District" on either the District of Columbia Taxicab Commission or the Commission's Panels on Rates and Rules as required by the District of Columbia Taxicab Commission Establishment Act of 1985 (DC Code § 50-305(a), § 50-306(b)). The proposed rulemaking is, therefore, without authority.
- 2. The proposed rulemaking gives the hack inspector and police officers more authority to stop taxicabs, even if they do not observe unlawful conduct. It increases fines and allows for the imposition of additional penalties out of proportion for a simple violation. For example, a driver can be fined \$1,000 and have his hack license suspended, revoked, or not renewed if his tires are over or under inflated.
- **3.** The proposed rules would cap the age of a taxicab at five years old. The new rules would force drivers to purchase a new automobile before their older one is paid off.
- **4.** The proposed rules would make innocent conduct illegal. For example, they impose a \$1000 fine in addition to license suspension, revocation or non-renewal, for possessing a copy of an operator ID card. While this rule appear to criminalize driving with "counterfeit" or "altered" operator identification card, the wording of the rule would subject to penalty –any driver who possess a copy of his identification card. An ID card is an official document; a driver should keep a copy of it without penalty.
- 5. The proposed rulemaking creates "violations" which are so descriptively vague, that they cannot fairly be enforced. A new violations for "unnecessarily slow driving" when passing "a hotel, theater . . . public building or place of public gathering or in the vicinity of a taxicab stand which is occupied to full capacity" carries a fine of \$40. When a taxi driver "perform[s] any willful act which [the Commission believes] is against the best interest . . . of the public," he may lose his license and have his vehicle impounded. A new violation for failing to "cooperate with . . . representatives of the Commission" results in vehicle impoundment and license suspension, revocation, or nonrenewal.

Printed Name	Signature	Telephone Number