

Taxi Modernization: Short-Term Actions  
*Results of Consultations &  
Recommendations to the PT Board*

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September 7, 2018

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## I. Introduction

The Passenger Transportation (PT) Board decided at its June 2018 Board meeting that it supported the Hara report on [Modernizing Taxi Regulation](#) in general, subject to hearing from the taxi industry and affected stakeholders. The three short-term action items recommended by Dr. Dan Hara that fall under the PT Board's purview are:

- Allowing existing licensees a one-time opportunity to increase their number of taxi vehicles (plates) by up to 15% in the near term;
- Giving the industry the flexibility to lower fares below meter rates in off-peak hours for app-hailed taxi trips; and
- Increasing efficiencies at shift change through separate day and night vehicles.

The implementation of these actions, if approved by the Board, will be optional for a licensee.

To determine the most appropriate method of consultation, the Board initially met with the two provincial taxi associations, BC Taxi Association and Vancouver Taxi Association, and the Taxi Drivers Association of Southern BC on July 25, 2018. Based on input from these meetings, the Board appointed a panel to hold eight meetings with licensees in seven locations of the province. The agenda for these meeting is provided in Appendix 1, and a presentation prepared by Dr. Dan Hara for the meetings is in Appendix 2. Information on meeting participants is provided in Appendix 3. The Board also decided to conduct separate surveys of taxi licensees and taxi drivers (see Appendices 4 and 5 for results).

Meetings with UBCM, Council of Senior Citizens Organizations of BC, Disability Alliance of BC, and some Transportation Network Companies were also undertaken.

## II. Licensees' Meetings

### Competitive Factors

The meetings with licensees demonstrated significant concerns about competition from Transportation Network Companies (TNCs). Some licensees felt TNCs would not enter smaller or rural communities. Most of the concerns about TNCs focused in the need for a level playing field between TNCs and taxis, and the need to have TNCs meet the higher taxi standards. Areas where taxi licensees feel a level playing field is need and request that government provide this include:

- Licence class. Most licensees felt very strongly that a Class 4 licence should be required for TNC drivers and that a class 5, even with additional training, creates safety concerns.
- Insurance charges. Most licensees thought insurance for TNCs would be volume-based, based on the kilometers driven or the hours used as a commercial vehicle. Taxis wanted the option for volume-based insurance as well, rather than be restricted to a 24 hour per day, yearly rate. This is especially a concern to licensees with taxis that are used part-time or only for peak periods.
- Hours of work. Taxi drivers are restricted to a maximum working period of 12 hours per day and 70 hours per week under the National Safety Code. Licensees' concerns include TNC drivers who work a regular job, then drive for a TNC and exceed the hours of work restrictions placed on taxi drivers. Again, this is based on safety concerns.

- Vehicle and passenger safety. Taxis must undergo regular vehicle safety inspections and it was felt that this should also be required of vehicles used in TNC operations. The issue was also raised that vehicles used for TNCs should be required to have cameras similar to taxi cameras for the safety of both passengers and drivers.
- Wheelchair accessibility. Wheelchair accessible vehicles have a higher capital cost and they cost more to operate and maintain. If major repairs are needed, the vehicle can be out of service for a considerable time period. It is highly unlikely that TNCs will provide this service, de facto outsourcing wheelchair accessibility to taxis. TNCs will have an overall cost advantage over taxis as a result.
- Enforcement. Enforcement resources reside with MoTI and are currently inadequate to meet needs. There is limited enforcement of the Chinese language TNCs currently operating. The level of fines for illegal ride-share operations is far too low. Significant additional resources will be required for enforcement of TNC regulations and to ensure a level playing field between taxis and TNCs.
- Inequities for passengers. It was felt that smart phone app users are typically younger and more affluent, yet these are the people who will benefit from TNCs' reduced fares. A high proportion of taxi users are seniors, people with low incomes and homeless persons, and these people will be paying comparatively more.
- Cancellation fees. TNCs charge a cancellation fee for passenger no-shows and this was referenced as a positive addition for consideration for app-hailed taxis.

Metro Vancouver licensees also requested that they be provided with some comparative advantages over TNCs. They requested the use of bus lanes and HOV lanes on additional highways. They noted that taxis typically have less density of coverage than TNCs and with accidents or congestion, use of bus lanes and HOV lanes can assist taxis in competing with TNCs. The Ministry of Transportation and Infrastructure (MOTI) has not responded to this issue.

The need for taxis to provide superior service to passengers was noted in a number of meetings.

Many licensees supported the Taxi Host training program offered through the Justice Institute and would like to see improvements to the program such as an on-line version supplemented with in-person resources delivered outside of the metro-Vancouver area. Changes to the program content to support topographies and technologies different than that for Metro Vancouver are needed. Some licensees felt their own in-house training program was superior to Taxi Host.

Some licensees noted that some cities like New York and London are capping the number of TNC vehicles to deal with the congestion arising from TNCs and suggested BC government do the same. Some also suggested that TNCs be obliged to pay drivers minimum wages.

In some meetings, "true" ride-sharing, where a number of people not associated with each other share a vehicle, was discussed.

## Hara's Short-term Action Recommendations

### 1 *Allowing existing licensees a one-time opportunity to increase their number of taxi vehicles (plates) by up to 15% in the near term*

Support for this recommendation was close to universal among taxi licensees. The few licensees opposed to this cited inadequate business to support additional plates or under-utilization of their current fleet.

#### **Implementation:**

Smaller and rural licensees and the BC Taxi Association noted the need to provide opportunities for an additional plate to those licensees that are small or rural, are independent and are not part of a larger corporate taxi company. It was suggested that the festive season Temporary Operating Permit policy could be applied (formula of 10% increase in fleet or 1 vehicle per licensee.)

Another implementation concern occurs in larger dispatch companies that have many single plate holders, with these plate holders being shareholders in the dispatch company. It was suggested that any increase in plates could be assigned to the dispatch company as individual license holders would otherwise not qualify for an increase in vehicles.

Some licensees raised concerns about drivers' incomes falling as a result of an increased supply of taxis on the road.

#### **Obstacles to Activation of New Plates:**

- a. Driver Shortages. This was a nearly universal concern throughout the province. In the past, new immigrants and foreign students provided a ready supply of new drivers. Current regulatory and administrative obstacles to addressing driver shortages include:
  - Class 4 regulations. A regulatory requirement for obtaining a class 4 licence specifies the need for three years of BC driving experience or equivalency. Drivers may skip the three year wait and take the commercial test immediately if they can demonstrate two years of recent driving experience with documents that ICBC is willing to recognize. Immigrants from India have often found it difficult to get acceptable documentation and have it validated. The process is time consuming and the result may not be recognized by ICBC. Even Canadians from other provinces may be required to get additional proof if their current driver's licence was renewed less than two years ago. Many individuals, particularly those refugees from war-torn countries, have difficulty meeting the identity and proof of driving experience conditions. These regulatory and administrative obstacles contribute to driver shortages.
  - Lengthy administrative delays. In the majority of locations in which the licensees who participated in the consultations operated, lengthy administrative and processing delays resulted in a loss of potential drivers. In rural or northern areas, delays can be up to six months. Potential new drivers cannot afford to be jobless for months, and in the face of delays, they find other work. Concerns include:
    - Delays of up to four or more months or having to travel to another community for a class 4 road test from ICBC in some regions;

- Delays of months to get a criminal record check completed. This varies by location and is especially lengthy if fingerprinting is required;
  - Lengthy time frames to get municipal chauffer permits in some jurisdictions. In some municipalities, permits can be issued the same day while in others it takes two months. Different requirements set by different municipalities are also an obstacle for drivers wanting to cross boundaries.
  - Provincial or regional permits with a two to three year life would be an improvement.
  - A possible move to a class 5 licence from class 4 for TNC or taxi drivers. If government approves this, it should set a minimum age of 25 years old, a minimum number of years of driving experience and additional training requirements. However, licensees were not supportive of this from a safety perspective.
  - *Driver wages.* Concerns were expressed about drivers' wages. Congestion and accidents in Vancouver, taxi meter rates that have not been increased for two years, increased costs of operating taxis and flat rates from YVR all drive down wages. Drivers move to other jobs if wages are considered too low. The BC economy is strong now, minimum wage is increasing and it is difficult to keep drivers in some regions.
- b. Wheelchair accessible taxis. Licensees were told that a proportion of new plates will be for wheelchair accessible taxis. A few licensees stated they prefer accessible taxis are not included as part of the 15% increase in taxis. Comments about accessible vehicles include:
- Length of time to acquire accessible taxis. Concerns were noted that there is only one approved supplier of accessible taxis in the province, resulting in significant delays in sourcing and repairing these vehicles. The Commercial Vehicle Safety and Enforcement (CVSE) agency has approved only rear-entry wheelchair accessible vehicles, while other Canadian jurisdictions have approved side entry vehicles. Approving side-entry vehicles would increase the availability of these vehicles and could reduce either capital acquisition cost or life-cycle costs. Side-entry vehicles are often preferred by disability advocacy organizations.
  - Cost of wheelchair accessible taxis. Higher capital, operating and maintenance costs are an obstacle to licensees. With only one company serving these needs, costs increase. Suggestions to assist with the higher costs of providing wheelchair accessible taxis include: direct subsidies, charging a fee per trip on all TNC and taxi trips which goes to operators of accessible vehicles, and expanding the Taxi Saver program.
  - Difficulty in getting drivers for accessible taxis. Drivers of these vehicles have lower earnings than drivers of other taxis due to additional time requirements for accessible trips and costs associated with the vehicles. Some companies currently subsidize drivers of accessible taxis by giving the driver the Taxi Saver monies, posting their trips beforehand or providing financial benefits such as discounted lease rates or dispatch fees.
  - The 15% expansion of plate numbers provides opportunities to:
    - Expand the number of wheelchair accessible taxis in areas that have a low percentage of these vehicles relative to the need for the vehicles. Twenty percent of the fleet of Vancouver taxi companies are wheelchair accessible, while some other areas of the province have significantly lower proportions. It was noted by a few companies that in some areas HandyDART service is very good and fewer accessible taxis are therefore

- needed;
- o Adjust the number of accessible vehicles required by some companies so that the percentage of accessible vehicles in fleets is more equitably distributed among companies in an operating area. For example, currently some small companies have a third of their fleet as accessible vehicles while larger companies in the same operating area have a much lower proportion.
  - c. Insurance. Cost of insuring a taxi is high and can be up to \$24,000 per vehicle per year in some areas. If volume-based insurance with a charge per kilometer or per hour of commercial driving is made available to TNC drivers, taxi drivers should be able to benefit as well. This is especially important for vehicles that are used primarily at peak hours or on a part-time basis.
  - d. Boundaries. Addressing boundary issues is needed to reduce taxi shortages at peak times and enable efficient and effective use of apps. This is true in Vancouver but also true in areas where the Board has set up disparate boundaries (e.g. parts of the Okanagan). Some discussion about the City of Vancouver's refusal to allow suburban taxis to pick up trips in the city occurred. Boundaries result in dead-heading, trip refusals, increased congestion, risky behaviour and under-utilized capacity.

## *2 Giving the industry the flexibility to lower fares below meter rates in off-peak hours for app-hailed taxi trips*

This recommendation was supported, although concern was expressed with the impact of lower fares on drivers' incomes. It was felt that the ability to implement this recommendation was necessary to compete with TNCs. The majority of licensees, however, did not want to see this measure put in place until just before TNCs enter the market.

Another consideration for timing is that most companies stated they did have apps, but did not have the technical capacity at this time to link fare collection by credit card directly with the app.

Concern was expressed that passengers would be upset if fares charged for identical trips varied at different times.

## *3 Increasing efficiencies at shift change through separate day and night vehicles*

The major shift change issue is trip refusals. The BC Taxi Association members felt that this issue can be best addressed through improved management of shift changes by companies, such as the staggering of shift change times or setting mutually agreed upon meeting places rather than a centralized location for shift change. The cost of having two vehicles to provide service for one plate is high. Shift change issues are primarily a concern in high congestion areas like Vancouver and Victoria.

Some licensees in the Vancouver Taxi Association were in favour of this recommendation. Where there is significant traffic congestion, it can take a long time to get to a common point for a shift change. One Vancouver company stated that the driver had to start thinking about what fares to accept an hour or an hour and a half before shift change. It was stated that taxi drivers had to consider the issue of shift change and the potential need to refuse trips up to one and a half hours prior to the time of a shift change. The advantages of having two cars on one plate are they can provide increased, overlapping coverage at peak hours, or they can be used for two electric vehicles, with one providing service and one

being charged.

Seventy percent of taxi drivers who responded to the drivers' survey say that at least sometimes refusal of a trip or completion of a trip at shift change is an issue. The majority of respondents to this survey were from the lower mainland. Forty-three percent of those who responded to the licensees' survey felt this was an issue at least sometimes.

### III. Union of BC Municipalities Meeting

A meeting with Gary MacIsaac, Executive Director of Union of BC Municipalities took place on August 16, 2018 in Victoria. After Board members provided a briefing on the PT Board's consultation, Gary MacIsaac noted that UBCM does not have a collective policy on the three short-term taxi modernization actions. He requested the Board provide an information piece outlining the three short-term actions on which the Board is consulting and how and where local governments can have their individual voices on these items. This information piece will be put into the UBCM's newsletter.

### IV. Council of Senior Citizens Organizations of BC (COSCO BC)

The Board met with Gudrun Langolf, President and Sheila Pither, First Vice-President, of COSCO on August 23, 2018. The Board presented an overview of the consultations and recommendations in the Hara report. COSCO made the following points:

- Some seniors do not use apps or smart phones. These people need telephone dispatch to get taxis.
- Flexible fares (reductions) could result in people on limited incomes, such as seniors and persons with disabilities, who do not use apps paying higher rates than people who use apps. Some seniors may not want to bargain for fares.
- More taxis make sense. Taxis have been serving communities for a number of years and they need to be recognized.
- HandyDART is not sufficient for service. It does not assist people in getting to entertainment or social events. Public transportation may not be comfortable for some seniors.
- Social isolation and loneliness are issues for some seniors. A lack of transportation options contributes to this.
- Driver professionalism is important. A class 4 licence is important. Driver training is essential. Drivers must be professional (and considered professional). It is important that regulations for drivers are not watered down and that Class 4 requirements remain. The public should know what training taxi drivers get.
- Taxis need to be considered a viable transportation option by seniors, especially those who no longer have a driver's licence.
- Wheelchair accessible taxis (WATs) are required for some persons with disabilities; however, others with mobility devices, such as walkers, may use conventional taxis. WATs need to be used – if there are not enough conventional taxis, WATs should be used. COSCO feels subsidies could increase WAT availability.

- Boundary restrictions create some challenges. It's important to go where the passengers are.
- COSCO supports side-entry taxis.

## V. Disabilities Alliance of BC (DABC)

The Board met with Jane Dyson, Executive Director and Justina Loh, Administrative Director, of Disabilities Alliance of BC on August 23, 2018. The Board presented an overview of the consultations and recommendations in the Hara report. DABC made the following points:

- Increased taxi supply is a positive move. If taxi supply is increased, the number of WATs should also increase. With WATs it is important to look at the amount of time that WAT users wait for a taxi compared to non-WAT users. WAT users wait much longer.
  - HandyDART cannot keep up with demand. Some people prefer taxis to HandyDART as taxis are “on demand” and more efficient. HandyDART versus taxis is an option that people should have. Taxi Savers are important and the program needs to be reviewed in light of ridesharing.
  - Could the Board do a survey of WAT users to get information on issues? DABC could assist.
  - There is concern about TNCs competing with taxis and the lack of regulation of TNCs.
  - Concerned about accessibility of apps to some people, such as those with dexterity challenges or vocal challenges. Many people are comfortable with telephone dispatch. People who cannot use apps will be penalized by paying more for transportation.
  - Driver training is an important issue. Drivers must be seen as, and feel like, professionals. The VTA has developed an excellent, practical training program for dealing with persons with disabilities that involves a video, manual and classroom training. This could be used as the basis for driver training throughout the province. At the end of the program, drivers should receive some certification.
  - The Taxi Bill of Rights and driver training have improved service in Vancouver.
  - DABC would like an increase in taxi supply to result in better service to persons with disabilities. There should not be differences in service provided. However, it is recognized that not all persons with disabilities require WATs.
  - DABC supports side-entry taxis.

## VI. TNCs

Between August 30, 2018 and September 6, 2018, the Board met with representatives of Lyft and Uber as well as Ripe, a former licensee that operated an luxury, app based transportation service. At each meeting, the Board presented an overview of the consultations and recommendations in the Hara report. We explained that the Board was independent from government and our focus on the Hara report was with the short-term actions directed to the Board. Government is handling legislative changes regarding ridesharing.

*LYFT – August 30, 2018 (Timothy Burr, Jr, Director of Public Policy; Rachelle Celebrezze; Director of Legislative Affairs from Lyft as well as Kimanda Jarzebiak)*

Lyft offers a traditional single car service (Lyft, Lyft Lux, Lyft XL) as well as a pooled ride, Lyft Link, which receives about 40% of rides. Lyft is a peer-to-peer service that operates in urban centres and small towns, some with as few as 2000 people. In Canada, Lyft operates in Ontario as Ontario does not require drivers to have a commercial licence.

Lyft did not have many comments on the three short term taxi modernization actions recommended by Hara. It also noted that:

- Transportation supply is an issue in many areas and Lyft's model provides consumers with additional choice
- Lyft's business model differs from taxis as Lyft is a peer-to-peer business model
- With Lyft's app, people may receive a fare estimate prior to the start of the trip. Lyft also has an option of "up front pricing" where a passenger pays the price quoted at the start of the trip. There are some exceptions, such when a passenger adds a stop or changes destination point.
- Lyft's app also has voice over capability for persons with disabilities

***Ripe Holdings Inc., September 5, 2018, Otis Perrik, President***

- Agreed that an increase of taxi supply is necessary and positive, especially in Lower Mainland. There also needs to be a level playing field.
- Fifteen percent is only leaning toward the status quo; not helpful to new entrants
- Flexible fares makes sense.
- Single shift vehicles make sense, especially if drivers are located some distance from each other

Ripe also noted that the boundary issue needs to be addressed to increase efficiencies and reduce supply issues. Apps can help with demand issues and companies need to invest in app development and maintenance to remain current with customer expectation.

***Uber, September 5, 2018, Michael van Hemmen, Uber Canada***

- Uber had no comment on the proposed 15% increase in supply other than to note that it was aware of driver shortages in the Lower Mainland
- Uber supports fare flexibility that allows variable fares. Uber also uses upfront pricing (passenger pays quoted rate at the start of the trip).
- Single shift vehicles may create enforcement issues. There are other ways to address shift change.

Uber indicated that in Toronto, it partners with taxi companies to provide wheelchair accessible vehicles and this is working well. In Calgary, it provides a per trip fee.

## VII. Licensees' Survey

An online survey of licensees was conducted. See Appendix 4 for the survey and its results. A total of 31 valid surveys were received. This is significantly less than the number of licensees and taxi company managers that attended the consultation meetings.

Prior to use of the licensees' survey, a check for potential bias was made. The results of the comparison of the PT Board's administrative data and the survey results demonstrate significant bias in the survey results. The survey results are biased toward those licensees holding a large number of plates compared to those licensees holding a small number of plates. Very significant bias is also shown toward licensees from the Lower Mainland region. Selection bias means the survey results are unrepresentative of all licensees.

The results of the licensees' survey are considered in developing the recommendations. But for the reasons above, they are given less weight than the results from the licensees' consultation meetings.

## VIII. Drivers' Survey

An online survey of drivers was conducted, as recommended by the TDASBC. A total of 160 valid surveys were received. The survey and its results are provided in Appendix 5.

Prior to use of the drivers' survey, a check for potential bias was made. The results of the comparison of the PT Board's administrative data and the survey results demonstrate significant bias in the survey results. The survey results are biased toward drivers in the Lower Mainland. Selection bias means the survey results are unrepresentative of all drivers.

The results of the drivers' survey are factored into the recommendations

## IX. Recommendations to the Board

### ***1 Allow existing licensees a one-time opportunity to increase their number of taxi vehicles (plates) by up to 15% in the near term.***

#### Rationale:

Dr. Dan Hara's report on Modernizing Taxi Regulation recommended this action as the current number of taxis is inadequate to meet peak-time needs. His research shows that when TNCs were introduced to in other jurisdictions, the combined trips of both taxis and TNCs increased significantly. If taxi fleets are not expanded, their ability to compete with TNCs drops as taxis do not have sufficient density of cars on the road. An increase in plates also provides licensees with some potential compensation for the anticipated decline in taxi values that occurs with the introduction of TNCs to the market. Licensees are the stakeholder group that will bear most of the long-term, negative financial impact associated with the introduction of TNCs to the BC market.

Support for this recommendation was received from a large majority of licensees in both the

consultation meetings and the licensees' survey.

This recommendation was also supported by COSCO and DABC, and all the TNCs acknowledged a need to increase transportation supply in BC generally and the Lower Mainland particularly.

The majority of those who completed the drivers' survey also supported this recommendation.

***1.1 Communicate concerns that are beyond the mandate of the PT Board that were identified during the consultation to the appropriate sources with the mandate to address the concerns: MoTI, ICBC or other agencies.***

Rationale:

During the course of the consultations, issues outside of the PT Board's mandate were noted, particularly those related to competitive factors for a level playing field with TNCs and obstacles to activation of new plates (see pages 3-7 above). These concerns affect the ability of the taxi industry to compete with TNCs and should be communicated to those with the mandate to consider and address the concerns.

The meetings with COSCO and DABC also provided information on concerns beyond the scope of the three short-term action item and requires follow up from the Board or other agencies.

The driver's survey also raised issues, but for the most part, these issues related directly to the three action items under consideration by the Board or to taxi companies' operating practices. Concerns will be communicated to the responsible agency.

***1.2 Provide an opportunity for small licensees to obtain an additional plate. This opportunity will be provided to some:***

- ***licensees who have between 4 and 7 plates on a licence;***
- ***licensees who jointly apply for a plate and together hold 4 to 7 plates; or***
- ***licensees in small rural communities that cover large distances.***

Rationale:

This was requested at the consultation meetings with licensees in smaller and rural areas, the BC Taxi Association and corroborated in the survey of licensees. Although the licensees' survey was completed by a disproportionately high number of licensees from the Lower Mainland and those holding a large number of plates, at least three-quarters of survey respondents agreed with these approaches to allocating additional plates to smaller, rural licensees.

A number of respondents to the drivers' survey felt that some of the new plates should be available to drivers. The head of the Taxi Drivers Association of Southern BC also advocated for this. At this point in time, it is not known how many licensees will request additional plates and how close this will come to

15%. Therefore, no decision is made on driver's access to plates.

Implementation of this recommendation will need to ensure that the total increase in plates does not exceed 15% in an operating area.

***1.3 Use the 15% increase in plates to increase the number of wheelchair accessible taxis. Use this as an opportunity to expand the number of accessible taxis in areas with a low percentage of taxis relative to the need for these vehicles, and as an opportunity to more equitably distribute the percentage of accessible taxis among companies in an operating area.***

Rationale:

COSCO and DABC advocate for more accessible taxis.

Participants in the licensees' consultation meetings and the licensees' survey were informed that some of the new plates would be wheelchair accessible taxis. Currently, the distribution of wheelchair accessible taxis in the province varies from a high of 18% in the Lower Mainland (Economic Region) to a low of 1% in the Kootenay (Economic Region). The percentage of accessible taxis also varies significantly among companies in an operating area; for example, the fleet of one licensee in the Capital Regional District currently has 33% of its plates assigned to accessible taxis. Concern over the allocation of wheelchair accessible plates is based on the higher capital cost of the vehicles, higher operating and maintenance costs, and longer out-of-service times in the event of repairs.

The allocation of wheelchair accessible taxis in the recommendation above is supported by the licensees' survey results and the consultation meetings. Concerns about the need for subsidies will be communicated through recommendation 1.1 above.

***1.4 If an extension period for activation of a plate is requested by a licensee acquiring a new plate, the licensee must demonstrate to the Board's satisfaction what factor(s) is causing the obstacle to plate activation. If the obstacle cannot be demonstrated to the Board's satisfaction, the plate approval may be rescinded.***

Rationale:

There is a financial benefit to owning a plate, and a cost to putting a taxi on the road and activating the plate. The intent of Dr. Hara's recommendation to increase the number of plates is to increase the number of operational taxi vehicles prior to the advent of TNCs. If plates are not activated and simply held, the strategic purpose of increasing the number of plates is lost. Nonetheless, a number of obstacles to activating plates and putting new vehicles on the road were identified by licensees. Some of these issues may be addressed by ICBC and MoTI, but some may not and may result in obstacles to

activating a plate that are beyond a licensee's control.

Hara's work states that the commercial success of TNCs shows how underserved the public has been by traditional taxi regulation. The combined trips of taxis and TNCs rise substantially when ridesharing is introduced. The increased density of for-hire vehicles improves service and results in disproportionately higher ridership levels. Increasing the number of vehicles on the road will help the taxi industry compete and defend its market share.

Both the consultation meetings with licensees and the licensees survey outline significant obstacles to activating plates, including driver shortages and obtaining wheelchair accessible vehicles. Requiring a licensee to demonstrate that an obstacle to plate activation exists will help ensure that the new taxis are put on the road wherever possible.

### ***1.5 Implement a streamlined application process and approval process for acquiring new plates under this one-time opportunity***

#### **Rationale:**

Taxi licensees have complained to Hara and to the PT Board that the existing Board application process is too onerous, requiring outside expertise be hired or a month of effort dedicated to completing the paper work. About one inch of paperwork is required. The time process for approval is too long and some dislike the call for written submissions on an application.

The opportunity to obtain a plate will be time limited and the Board will then revert to its original application process.

The Board's activities are guided by the *Passenger Transportation Act and Regulations*.

### ***2 Give the taxi industry the flexibility to lower fares below meter rates in off-peak hours for app-hailed taxi trips, effective September 1, 2019.***

#### **Rationale:**

Dr. Dan Hara's rationale for this recommendation was that people will take more taxis in off-peak hours if the price is lower. This may mean a net gain in revenue if more trips offset lower fares. Ridesharing in other locations has confirmed this. Providing this flexibility to taxis for app-hailed trips allows them to compete with TNCs.

Concerns about the recommendation were expressed by licensees in the meetings and on the licensees' survey, centering around the impact on drivers' wages, a lack of equity for those passengers who do not use smart phones, customer confusion about fare variances, and the lack of technology to do this. The BC Taxi Association and VTA supported this recommendation at the meeting, with most licensees stating they would not use this flexibility until just prior to TNCs entering the market. Only half the licensees in

the survey supported the recommendation generally, but a higher proportion supported it if it was introduced just prior to the coming of TNCs to the market.

COSCO and DABC concerns with this recommendation focus on the inequities for those without smart phones.

The majority of taxi drivers do not support this recommendation, and approximately half of the drivers do not want the flexibility to lower fares even after ridesharing is introduced. Reasons for their lack of support are primarily the impact on driver's wages.

This recommendation is effective September 1, 2019. The Minister of MoTI has stated that TNCs will offer services in the province by fall 2019. The recommendation is supported by the Board because it is permissive, not mandatory. It is a tool that assists the industry in competing with TNCs. The implementation of the recommendation is delayed based on concerns expressed by licensees, taxi drivers, COSCO and DABC.

### ***3 Increasing efficiencies at shift change through separate day and night vehicles.***

Dr. Dan Hara recommended this to address issues such as shift change. Most licensees felt problems at shift change were a company operational issue and could be solved without Board direction.

The BCTA was adamantly against this, stating that the cost of two vehicles for one plate was prohibitive. More taxi drivers than licensees felt refusal of a trip or completion of a trip at shift change was an issue.

Some VTA licensees were in favour of this recommendation and stated it is more of a concern in highly congested areas. Use of two vehicles for one plate is also an asset for electric vehicles when one vehicle needs charging.

This recommendation is supported by the Board because it is permissive, not mandatory. It can be implemented by a taxi company if it wishes to implement it. It is a tool that assists the industry in competing with TNCs.

## **X. Board Response to Recommendations**

The PT Board approved the above recommendations on September 7, 2018.

## XI. Appendices

## Appendix 1: Consultation Meeting Outline

1. Introductions
  - PT Board: C. Read and R. LeClerc
  - Dr. Dan Hara
  - MoTI or Board Recorder
  - Participants
  
2. Background
  - Hara Report on Modernizing Taxi Regulation
  - Select Standing Committee on Ridesharing
  - Board Review of Hara Report
  - Board Three-stage Process to Review Hara Recommendations
  - Timeframes
  - Communication
  
3. Presentation by Dr. Dan Hara
  
4. Discussion Items
  - One-time Opportunity to Increase Plates up to 15%
  - Fare Flexibility for App-Hailed Trips
  - Improving Shift Change
  
5. Other Items
  - Taxi Data and Apps
  
6. Next Steps

## Appendix 2: Dr. Hara's Presentation for Board Consultations



*Short Term Initiatives to  
Modernize Taxi Regulation*

Passenger Transportation Board Meetings  
August 13 to 17, 2018

Dr. Dan Hara  
Hara Associates Incorporated



### Report Mandate

- Title: "Modernizing Taxi Regulation" at <http://www.th.gov.bc.ca/rpt/>
- Considers how to modernize taxi regulation.
  - To allow taxi industry to remain viable and compete.
  - In the context of "ride-hailing" (Transportation Network Companies or TNCs)
- Methods:
  - Comprehensive consultation with the taxi industry associations, rideshare companies, local governments, consumer and business interest groups, police forces, Treaty First Nations.
  - Observed experience of other jurisdictions.
  - Analysis of Hara Associates.
- Report has two types of suggestions:
  - Longer term: legislative change for ministry and cabinet to consider.
  - **Immediate suggestions for Passenger Transportation Board to help the taxi industry.**

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## World Context: What we already knew

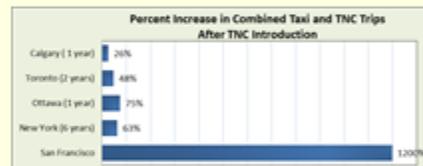
- Most of the world regulates the number of taxis, and fixes meter rates.
- There are good reasons for managing the number of taxis and rates, however, the disadvantages are well known:
  - Failure to expand taxi numbers with demand leads to shortages, high lease payments on a licence.
  - A fixed number of vehicles is arbitrary: too many at 10 a.m.; too few on Friday night.
  - Meter rate is arbitrary average: too high for 10 a.m., too low for Friday night.
- Result:
  - Unhappy consumers at peaks, idle taxis and drivers at off-peak.
  - Hospitality and tourism constrained.

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## ... World Context

- New: The commercial success of TNCs shows us *how underserved* public has been by traditional taxi regulation.
- *Combined trips* of both taxis and TNCs rise substantially.



- Many of these trips are potential taxi trips.
- **Most jurisdictions with TNCs have left taxi regulation unchanged.**
  - Leaves taxi industry with worst of both worlds – faced with TNC competition while regulations prevent expanding fleet to compete.
  - Consumers lose choice – many prefer a taxi.

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## Immediate Suggestions for Passenger Transportation Board

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1. Allow existing licensees a one-time opportunity to increase their number of taxis by 15%.
  - Optional, but must put vehicle on road if taken.
2. Allow discounting from meter rate for app-booked trips.
  - Lower fares may be offset by more passengers in off-peak → possible higher revenue
  - Prepares for competition with rideshare companies.
3. Allow separate day and night shift vehicles for each licence.
  - Makes shift change more efficient.
  - Reduces trip refusals
  - Lays ground for alternate insurance models.

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**Thank you.**

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### Appendix 3. Licensees' Consultation Meeting Participants

1. Prince George – August 13, 2018

Licencee / Company	Reps	Originating Area / City
Prince George Taxi	5	Prince George
Town Taxi	1	Williams Lake
Emerald Taxi	2	Prince George
BC Taxi Association	1	All BC

BCTA's President stated that he has also spoken with companies in Terrace, Dawson Creek and Haida Gwaii and they are all supportive of the 15% one-time increase.

2. Kelowna – August 14, 2018

Licencee / Company	Reps	Originating Area / City
Checkmate Cabs	4	Kelowna
Cedar Taxi	1	Trail
Kelowna Cabs	5	Kelowna
Apple Cab	1	Kelowna
PRC Cabco	1	Nelson
BC Taxi Association	1	All BC

3. Kamloops – August 14, 2018

Licencee / Company	Reps	Originating Area / City
Kami Cabs	5	Kamloops
Yellow Cabs	1	Kamloops
Little Shuswap Taxi	1	Chase
Salmon Arm Taxi	1	Salmon Arm
Barriere Taxi	1	Barriere
BC Taxi Association	1	All BC

4. Vancouver, Vancouver Taxi Association members – August 15, 2018

Licencee / Company	Reps	Originating Area / City
Yellow Cab	3	Vancouver
MacLures Cab	1	Vancouver
North Shore	1	North Vancouver
Bonny's Taxi	1	Vancouver
Richmond Cabs	2	Richmond

5. Surrey – August 15, 2018

Licencee / Company	Reps	Originating Area / City
Sunshine Cabs	2	North Vancouver, West Vancouver, YVR
Kimber Cabs	1	Richmond
Bel-Air Taxi	1	Coquitlam, PoCo, Port Moody
Newton Whalley Taxi	4	Surrey, White Rock, Delta
Garden City Cabs	3	Richmond
Delta Sunshine Taxi	3	Delta, Surrey
Abbotsford Taxi	1	Abbotsford
Chilliwack Taxi	1	Chilliwack, Agassiz
Royal City Taxi	2	New Westminster
Fort St John Cabs	1	Fort St. John
Cheam Taxi	1	Chilliwack
Agassiz and Harrison Taxi	1	Agassiz, Harrison
Abbotsford Taxi Mission Taxi Matsqui Taxi	2	Abbotsford, Mission, Matsqui
Pacific Cabs	2	Langley, White Rock, Surrey
Wass Taxi	2	Langley, White Rock
Surdell Taxi	2	Surrey, Delta
Green Cabs	1	Surrey, Delta, YVR
Central Valley	1	Abbotsford
Guildford Cabs	1	Surrey
Whistler Taxi	1	Whistler
BC Taxi Association	1	All BC

6. Nanaimo – August 16, 2018

Licencee / Company	Reps	Originating Area / City
AC Taxi	4	Nanaimo
Comox Taxi	1	Comox Valley
Yellow Cab	3	Nanaimo
Duncan Taxi	1	Duncan, Cowichan Valley
Oceanside Taxi	1	Parksville
United Cabs	2	Port Alberni
Cobble Hill Taxi	1	South Cowichan Area
BC Taxi Association	1	All BC

7. Victoria, BC Taxi Association members – August 17, 2018

Licencee / Company	Reps	Originating Area / City
ABC Airport Taxi	1	Victoria
Weekend Cab	1	Victoria, Capital Regional District
Sidney Taxi	2	Sidney, North / Central Saanich
Westshore Taxi	1	Westshore
Esq Taxi	2	Victoria, Esquimalt
BC Taxi Association	1	All BC

8. Victoria – August 17, 2018

Licencee / Company	Reps	Originating Area / City
Bluebird Cabs	2	Greater Victoria
Yellow Cab	1	Greater Victoria

## Appendix 4. Licensees' Survey

An on-line survey of licensees was linked to the PT Board website and advertised in the PT weekly Bulletin and at the licensee consultation meetings. The survey was available for responses between August 9 to the 28, 2018.

Respondents were screened out for any of the following reasons:

- They did not provide a valid licence number or legal name for a taxi company in BC;
- They did not self-identify as a Licencee, Licencee and Driver, or a Taxi Company Manager; or
- They did not substantially fill out most questions in the survey.

A total of 31 valid surveys were received. This is significantly less than the number of licencees and taxi company managers that attended the consultation meetings. The survey and its results are provided below. Not all respondents answered all questions.

Prior to use of the licensee survey, a check for potential bias was made. Two areas for which the PT Board has information to check for bias are:

- the distribution of licensees by regional district, compared to responses to Q2 below; and
- maximum fleet size, compared to responses to Q3 below.

### Distribution of Taxi Plates by Regional District

No. of Plates	Board Data	Survey Data
1	34%	23%
2 - 3	16%	3%
4 - 7	17%	23%
8 or more	33%	50%

### Distribution of Licensees by Region

Region	Board Data	Survey Data
Lower Mainland	21%	65%
Vancouver Island & Coast	45%	19%
Thompson - Okanagan	15%	6%
All other	19%	10%

The results of the comparison of the PT Board's data and the survey results demonstrate significant bias in the survey results. The survey results are biased toward licensees with a large number of plates and against licensees with a small number of plates. Very significant bias is also shown toward licensees from the Lower Mainland region and against all other regions.

**The data below are based on statistically biased information.**

TAXI LICENCEE SURVEY

Short-term Actions for Taxi Modernization

This survey is for taxi licencees in BC. It is part of the Passenger Transportation (PT) Board's August 2018 consultation with taxi stakeholders. The Board asks that only **one representative per licencee** (i.e. the corporation, partnership or sole proprietor that holds a PT Licence) answer this survey. The survey focuses on recommendations from Dr. Dan Hara's June 2018 report on taxi modernization. These short-term recommendations relate to taxi supply, rate flexibility and shift change.

Input the PT Board receives through survey responses and other consultations will inform the policies and streamlined application process the PT Board will implement in response to the Hara recommendations.

The survey is voluntary and a response is encouraged, not required. Please do not provide any personal information or third-party information (i.e. talk about other people by name) in your responses to survey questions. Your responses will be kept confidential and we will ensure that any personal or third-party information is not collected. If you have any questions or concerns, contact the Passenger Transportation Board at 250-953-3777 or [ptboard@gov.bc.ca](mailto:ptboard@gov.bc.ca).

**A. Background**

1. What is the licence number (or legal name) of the company you represent?

Note: only respondents providing a valid taxi licence number or legal name were included in the survey results

2. Your taxi licence is for which city or town? (List if more than one)

Note: See above. Information provided used to check for survey bias

3. What is the maximum number of plates you can use under your licence?

# Plates	%
1	23%
2 to 3	3%
4 to 7	26%
8 to 25	10%
More than 25	39%

4. Which of the following best describes your situation? (Check one only)

Note: if a respondent checked Driver or Taxi Company Employee their responses were not included in the survey.

Licencee	19%
Licencee and Driver	39%
Taxi Company Manager	41%

**B. Recommendation to Increase Taxi Plates**

**Hara Recommendation:**

- Allow existing licencees a one-time opportunity to increase their number of plates by up to 15% in the near term.

**Hara Rationale:**

- Current number of taxis is inadequate to service the need in peak times. The introduction of ridesharing in other locations demonstrates a significant expansion in trip volumes for vehicles-for-hire (well above 15%). Increasing the number of plates will help the taxi industry compete and defend its market share. It also offers some potential compensation for the anticipated decline in taxi plate values with the introduction of ridesharing.

5. Do you support allowing existing licencees a one-time opportunity to increase their number of taxi plates by 15%?

Support	94%
Do not support	6%

Reasons:

- Not all current plates are being used. My City has more than enough plates.
- 15% should be viewed in light of need. Vancouver differs from the rest of province. In my City 10% may be more suitable

6. A number of approaches can be used to determine whether licencees are eligible for an extra plate. Do you agree or not agree with the following?

Circumstance	Agree	Disagree
If a licencee has between 4 and 7 plates on a licence, he (she) is eligible for an extra plate?	88%	12%
If a number of licencees together hold 4 to 7 plates, they can jointly apply for one extra shared plate?	75%	25%
A licencee in a small, rural community that covers a large distance is eligible for an extra plate?	76%	24%

Other circumstances in which a licensee can qualify for an extra plate?

- There should be a demonstrated public need.
- Provide another plate if more than 25% of the fleet are wheelchair accessible vehicles.
- Need to analyze current market need

7. Will any of the following be an obstacle to you to activating a new plate in a timely manner?

Obstacle	Yes	No
A driver shortage	41%	59%
Time needed for a criminal record check for a new driver	27%	73%
Cost of insurance	43%	57%
App for smart phones	19%	81%

Other obstacles:

- Difficulty getting a class 4 licence
- Keep the rules the same
- Can be challenging to find high-quality drivers who represent the brand well

8. If the Board allows more plates, some will be for wheelchair accessible taxis. These cost more to buy, equip and operate. Please comment on how the PT Board should decide which vehicles are wheelchair accessible.

Responses:

- Base the number of wheelchair accessible vehicles given to an applicant based on its percentage of fleet (7 comments)
- This service needs to be subsidized as it has higher purchase, operating and maintenance costs than other services (4 comments)
- Even out the ratio of wheelchair accessible taxis to other taxis among companies. Some have a higher percent and they are more expensive to operate (2 comments)
- It should be up to the licensee
- Should be based on the need for the service
- Government should operate these vehicles or pay to outsource the service
- Insurance should cover the replacement cost of wheelchair ramps
- I run electric cars and there are no wheelchair accessible electric vehicles
- Accessible vehicles would not be part of the 15% of new plates

9. If no applications are received from licensees in an operating area, or if the total additional plates for which applications are received is less than 15%, should the process be opened up to those who don't currently have a licence?

	Yes	NO
Open the process to others	29%	70%

Reasons:

- The goal is to increase the number of taxi vehicles
- Should be based on public need
- Will create trouble in the industry
- If an area doesn't participate it may be because there is no need and the economics aren't there
- Need to require existing processes such as safety check rules are followed
- Provide an opportunity to new entrants
- My city doesn't need more taxis
- Existing licences have demonstrated business sustainability

### C. Recommendation to Provide Rate Flexibility

**Hara Recommendation:**

- Provide the flexibility to lower fares below meter rates in off-peak hours for app-hailed taxi trips. This is not provided for street hails or taxi stands pick-ups.

**Hara Rationale:**

- People will take more taxis in off-peak hours if the price of taxis is lower. This may mean a net gain in revenue if more trips offset lower fares. Ridesharing in other locations has confirmed this.

10. Do you support allowing taxi companies to lower fares below meter rates in off-peak hours for app-hailed trips?

	Support	Do Not Support
Lower fares in off-peak hours for app-hailed trips?	52%	48%

Reasons:

- Lowers drivers' wages; costs need to be covered (3 comments)
- Doesn't work in low population areas
- Need to communicate to customers in advance of trip
- Needs to be level playing field between companies (2 comments)
- Support based on a single app
- Don't have technology, complex to determine off-peak times, confusion for customers, no benefits for those with low incomes or not tech savvy

11. Should flexibility to lower rates below meter rates in off-peak hours for app hailed taxis wait until ridesharing is introduced?

Yes      No

61%	39%
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12. Do you have the technology for customers to hail a taxi with an app and for the app to calculate alternative lower fares for off peak trips?

Yes      No

50%	50%
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#### D. Recommendation to Increase Shift Change Efficiency

**Hara Recommendation:**

- Increasing efficiencies at shift change through separate day and night vehicles and allow taxis to complete trips when meter is on.

**Hara Rationale:**

- Trip refusal at shift change has been an issue in some parts of the province.

13. Does your company operate vehicles for 2 shifts per day?

%

Usually	85%
Sometimes	14%
Never	

14. Is refusal of a trip or completion of a trip at shift change an issue for you or your clients?

%

Often	4%
Sometimes	39%
Never	57%

15. How can shift change issues be managed?

Thank you for your response.

## Appendix 5. Drivers' Survey

An online survey for taxi drivers was linked to the PT Board website, advertised in the PT weekly Bulletin, shared by email with the Taxi Drivers' Association of Southern BC, Vancouver Taxi Association and BC Taxi Association, and at the licensee consultation meetings. The survey was available for responses between August 9 to 28, 2018.

Responses were screened out for any of the following reasons:

- They did not provide the name or dba of a taxi company that operates BC; or
- They did not substantially fill out most questions in the survey.

A total of 160 valid surveys were received. The survey and its results are provided below. Not all respondents answered all questions.

Prior to use of the driver's survey, a check for survey bias was completed. We found that almost all responses were provided by drivers in Metro Vancouver. The table below compares the geographical distributions of survey responses to taxi plates.

### Distribution by Region

Economic Region	Survey Responses	Plates
Lower Mainland	94%	66%
Vancouver Island & Coast	3%	14%
Thompson - Okanagan	1%	9%
Kootenays	2%	2%
All other	0%	9%

### Lower Mainland Breakdown:

City of Vancouver	56%
Metro Vancouver outside of City of Vancouver	39%

The comparison shows that results of the driver's survey are almost entirely representative of the views of drivers in Metro Vancouver. Survey responses do not necessarily represent the views of drivers outside Metro Vancouver.

## TAXI DRIVER SURVEY

### Short-term Actions for Taxi Modernization

This survey is for taxi drivers in BC. It is part of the Passenger Transportation (PT) Board's August 2018 consultation with taxi stakeholders. The survey asks drivers for input on 3 recommendations to the PT Board in the June 2018 report by Dr. Dan Hara on taxi modernization. Recommendations relate to taxi supply, rate flexibility and shift changes.

Input that the PT Board receives through survey responses and other consultations will inform the policies and streamlined application process the PT Board will implement in response to the Hara recommendations.

The survey is voluntary and a response is encouraged, not required. Please do not provide any personal information or third-party information (i.e. talk about other people by name) in your responses to survey questions. We will keep your responses confidential and ensure that any personal or third-party information is not collected. If you have any questions or concerns, contact the Passenger Transportation Board at 250-953-3777 or [ptboard@gov.bc.ca](mailto:ptboard@gov.bc.ca).

#### **A. Background**

1. What is the name of the licensed taxi company (or companies) you drive for?

Note: only respondents that identified a valid taxi company or its trade name were included in the survey results

2. The taxi you drive is licensed for which city or town? (List if more than one)

Note: See above. A disproportionate number of responses (94%) were from Metro Vancouver.

3. What taxi shifts do you operate? (Check all that apply)

Full time only	125	78%
Part time only	14	9%
Long shift only	7	4%
Multiple Shift Periods (FT, PT, LS)	8	5%
YVR only	6	3%

4. How are you compensated for operating a taxi?

As a lease operator or plate lessee	49%
By commission (e.g. split of taxi fares)	6%
Strictly by the hour	3%
As a shareowner / operator	68%

## B. Recommendation to Increase Taxi Plates

### Hara Recommendation:

- Allow existing licensees a one-time opportunity to increase their number of plates by up to 15% in the near term.

### Hara Rationale:

- Current number of taxis is inadequate to service the need in peak times. The introduction of ridesharing in other locations demonstrates a significant expansion in trip volumes for vehicles-for-hire (well above 15%). Increasing the number of plates will help the taxi industry compete and defend its market share. It also offers some potential compensation for the anticipated decline in taxi plate values with the introduction of ridesharing.

5. Do you support allowing existing licensees a one-time opportunity to increase their number of taxi plates by 15%?

Support	59%
Do not support	41%

Why not?

Responses:

A total of 19% of respondents provided written responses.

- 11% indicated that increasing supply is not the solution for reasons that include (a) not addressing oversupply at non-peak times and some locations, fleet inefficiencies caused by boundary constraints, and (b) the problems can be addressed with such things as new technologies, allowing rideshare apps and overlapping shifts at peak times.
- 8% said plates should be issued to drivers

## C. Recommendation to Provide Rate Flexibility

### Hara Recommendation:

- Provide the flexibility to lower fares below meter rates in off-peak hours for app-hailed taxi trips. This is not provided for street hails or taxi stands pick-ups.

### Hara Rationale:

- People will take more taxis in off-peak hours if the price of taxis is lower. This may mean a net gain in revenue if more trips offset lower fares. Ridesharing in other locations has confirmed this.

6. Do you support allowing taxi companies to lower fares below metered rates in off-peak hours for app-hailed trips?

	Support	Do not Support	No answer
Lower fares in off-peak hours for app-hailed trips?	29%	69%	1%

Comments:

- 4% provided comments that reflect support, all other comments reflected non-support or concerns
- 34% of comments pointed to high operating costs (insurance and gas are referenced most), low profits
- 6% noted that rates have not increased, are already low (including YVR flat rates) or should be increased of rate increase
- 4% pointed to unfairness for passengers who use phone dispatch or WATs,
- 2% suggested the change could have a destabilizing effect on the industry
- 3% believe that changing rates will have little effect on the use of taxis

7. Should flexibility to lower rates below metered rates in off-peak hours for app hailed taxis wait until ridesharing is introduced? Yes \_\_\_ No \_\_\_

Yes	No	No answer
45%	48%	7%

#### D. Recommendation to Increase Shift Change Efficiency

##### Hara Recommendation:

- Increasing efficiencies at shift change through separate day and night vehicles and allow taxis to complete trips when meter is on.

##### Hara Rationale:

- Trip refusal at shift change has been an issue in some parts of the province.

8. Does the company you drive for operate vehicles for 2 shifts per day?

Usually	88%
Sometimes	4%
Never	6%
No response	2%

9. Is refusal of a trip or completion of a trip at shift change an issue for you or your clients?

Often	27%
Sometimes	43%
Never	28%

No response	3%
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#### 10. How can shift change issues be managed?

##### Responses:

- 9% of respondents commented reflecting support for existing shift change practices (at two different times)
- 29% made specific suggestions on how shift changes might change including—different times of day (4%), staggering shift changes at more times per day (18%), choosing times that do not fall within peak times (6%), focusing on weekend shift changes as the main problem (2%).
- 20% of respondents provided comments in favour of single-shifting vehicles—some noting the need for ICBC to adjust it rates
- 23% provided comments with a variety of other approaches, a few of which note the need for more enforcement, open boundaries and some more novel suggestions that include:
  - 8 hour shifts, or shift leases by the hour
  - Different shift times for different companies in a city
  - At peak hours, switch to a central dispatch system for all taxis [1]
  - Compensate driver of new shift when prior driver goes longer to finish shift [3] up to 1 hour [1]
  - Promote use of apps that declare passenger destination—so driver is aware before accepting, and dispatch ‘end of shift’ trips with destinations near the shift change location
  - Make trip refusals a violation when “shift change” is the reason [1]
  - Allow taxis to use HOV lanes between North Shore & Vancouver to speed up service [1]
  - Lease plates by the hour, not the shift. This will also end driver shortages [1]
- 2% noted problems with the shift change proposal that include higher operating costs and change, and a statement that everyone wants the shift to change at 4 pm.

#### E. Conclusion

##### 11. Do you have other comments? (specify)

56% respondents provided written comments that cover a variety of topics which are summarized below by categories (largest number to smallest number).

- Increase supply in a number of suggested ways that includes:
  - Increase WATs as overall supply increases
  - Single shifting taxis will address supply problems—especially with overlaps at peak times
  - YVR outbound taxis should be able to pick up at drop off location for trips back to YVR
  - All Lower Mainland taxi should use app for overflow calls
- Industry Fairness—need to correct imbalance between drivers and shareholders primarily by issuing plates to drivers or regulate lease rates—a change that would have cost and service benefits for passengers
- Open up boundaries in the Lower Mainland
- Rates should continue to be regulated for industry stability,
- Increase rates and allow trip cancellation fees
- Ridesharing should have the same requirements as a taxi (insurance, driver requirements, open boundaries for both not one)
- Use latest tech to overhaul taxis to compete with ridesharing—government should own any single app for taxis, not a private company

Thank you for completing this survey.