

July 31, 2014

Via Electronic Mail

Attn: Juanda Mixon

Secretary to the District of Columbia Taxicab Commission

2041 Martin Luther King Jr Avenue SE, Suite 204

Washington, DC 20020

dctc@dc.gov

Dear Chairman Linton, Members of the Commission and Staff:

This letter is in response to the recent DC Taxi Commission (DCTC) Notice of Proposed Rulemaking for Chapter 18 which would implement the Coordinated Alternative to Paratransit services (CAPS-DC) pilot program. The DC Taxi Commission's Disability Advisory Committee congratulates the Commission and Washington Metropolitan Area Transit Authority (WAMATA) staff for its work so far to increase the numbers of accessible taxis in the District. As you know, accessible transportation is vital to many District residents, workers and visitors. Increased numbers of accessible vehicles for-hire will have an immediate beneficial impact and allow for increased access to employment, education, social events, healthcare, and community participation.

We hope you will consider the following suggestions for the pilot program and the future if (and we really think when) the program is successful:

1. We are encouraged by the plan to collect data for monthly reports and six-month summary reports of the number of trips taken and District savings. We hope you will consider including a summary of the feedback from CAPS-eligible passengers, the number of accessible taxis purchased as a result of the program, and the number of rides those accessible taxis provide to mobility-device users.
2. We understand the District's desire to work with companies that have dispatch programs and experience providing accessible service. If you find that this program is successful, we ask you to consider working with independent owners/operators or associations who participate in a third party central dispatch, such as Hailo, and complete city or third party accessibility training.
3. As previously stated, we are grateful for the DCTC's and WMATA's work to increase the numbers of accessible taxis in the District. We ask you to review, every six months, whether the new accessible taxis purchased as a result of the program are being utilized. Other cities with accessible taxi programs report losing accessible taxi drivers to Transportation Network Companies. We are concerned that this trend may affect service here as well.

In addition, we note that, according to the DCTC press release regarding the CAPS-DC program, the DCTC may make available additional licenses to new associations for accessible service. We support this measure. We suggest combining this effort with low or no-cost incentives for drivers, and grants or loans for drivers who would like to provide accessible service but find the initial cost of the vehicle prohibitive.

The Disability Advisory Committee thanks Chairman Linton, and DCTC staff, Christiaan Blake and WMATA staff for their work. Please do not hesitate to contact Carol Tyson, Vice-Chair of the Disability Advisory Committee with any questions at ctyson@unitedspinal.org or (202) 556-2076 ext. 7104.

Sincerely,

The District of Columbia Taxicab Commission Disability Advisory Committee

CC: Christiaan Blake, Director, WMATA Office of ADA Policy
Councilmember Mary Cheh, Chair, DC Council Transportation and Environment Committee