

Money Max Funding, Inc.



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PA PUC
SECRETARY'S BUREAU

Date August 20, 2014

BEFORE THE
COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

RE: Interested Party - Notice of *En Banc* Transportation Hearing
Docket No.: M-2014-2431451

The Pennsylvania Public Utility Commission (Commission or PUC) will hold an *En Banc* hearing on **Thursday, August 28, 2014, at 9:00 a.m.** to seek testimony regarding transportation industry issues. The purpose of this hearing is to permit participants to highlight or summarize positions on key issues that the Commission plans to address regarding: (1) current issues in the transportation industry and (2) whether the Commission's transportation regulations should be updated to address these issues.

Testimony;

Simon Abitbol, Fleet owner & James Walker, manger are submitting written testimony on behalf of several PPA certified taxi corporations, dispatch association, and medallion financing company, all certified by the Philadelphia Parking Authority.

With more than 30 years in the taxicab industry we have seen it all, from new public transportation services to Black car services to the negative stereo typical views of our drivers and our industry. However, other than the recently implementation of the Black Car Service no other industry has been in such direct unfair competition with the taxi than these so called new technology transportation services. It is surprising to hear that the commissioners have sided and/or supports a proposed bill by Sen. Fontana that not only amends title 53 and title 66 (common carrier) but introduces new legislation and with new regulations for this so-called service, which laws and strict regulations are already in place.



The first question we would like to ask is "What is a transportation network service"? What is a "transportation network company"? To my understanding these new services offer the public an app. Other than Uber who is certified thru licensed limousine companies in Philadelphia and/or the state of Pa., these other services provide through this app a connection to someone with a vehicle that is not registered or licensed, in this state that is illegal. FYI though it is illegal this activity has been going on for years in every major city in the country without the app. They are called "HACKS".

Hacks are people with a vehicle that may sit at major public transportation hub (SEPTA for example) or hang around the airport, train station, or bus station and hustle (solicit) people for rides. What's interesting is the fact that they ask these people if they need a TAXI. "Taxi mam" - "Taxi sir". Besides the fact that these so called transportation network services have ignored the laws of this state they take 20% or some percentage of the fares and/or they get a percentage from the credit card industry for using the app or for processing the fare (no body has mentioned this yet). What the H#@ does a donation mean?

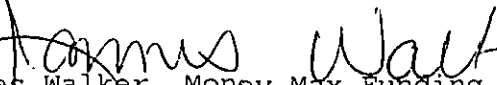
Let's take it a step further, the PUC was set-up to protect the public, let's look at the fare structure; these services charge less than a taxicab in some cases on Monday thru maybe Wednesday or when the sun is shining and the weather is nice, but what about Friday and Saturday night or when it's raining or there is snow on the ground, to my understanding the price could jump 200-400% higher. The common carrier industry is regulated including the fare we charge to the public and there is a lengthy process that we must follow in order to an increase in the fare including a public comment period.

Where do we stop? Why not create an app for the buses or the trucking business, and I'm not trying to be sarcastic, its real I could develop an app for the travel agent market, offer an app to driver/owners that have unlicensed non-regulated busses and broker a deal with the public by marketing the app by telling the public you don't have to call the travel agent or go to those filthy bus station when all you have to do istap the app and we will have a bus there in 10 minutes. What about an app for the trucking and moving industry, or and app for liquor, or the airline etc. We feel that if the commission is to regulate this new up-start business they should be regulated in a different category because it is an app. Why not draft new legislation for Verizon or Comcast, they do the same thing.

Just to speak on the fairness of the issue, how can the regulators of one industry allow the competitors that provide the same service different requirements? How can I tell one he can't do something and tell the other he can do something? Most importantly is the tariff, how we allow competitors of the same regulated industry charge more or less than the other.

Again we are confounded that the commission would support this legislation. We already have legislation and regulations in place for the common carrier industry. The industry for non-medallion taxicabs in the state of Pa. is simple, if someone wants to start a taxi business all they need do is follow the procedures and requirements that are set by the PUC and if they qualify they will be given a certificate.

Regards


James Walker, Money Max Funding, Inc.

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