

**TESTIMONY**  
**of**  
**James Salinger**  
**Before the Commonwealth of Pennsylvania**  
**Pennsylvania Public Utility Commission**  
**President of the Philadelphia Regional Limousine Association (PRLA)**  
**Owner of Unique Limousine Service, Inc., Harrisburg, PA**

Good Morning, Mr. Chairman and members of the Pennsylvania Public Utility Commission. My name is James Salinger and I am here as President of the Philadelphia Regional Limousine Association (PRLA) and as owner of Unique Limousine Service, Inc. I want to thank you for providing us the opportunity to give our views on the important issues that you have raised.

Unique was established 1982 with operating authority granted by the PA PUC and the Federal DOT. Since the creation of the Philadelphia Parking Authority (PPA) we have operated under authority granted by them.

Unique operates a mixed fleet of 67 vehicles range from luxury sedans, Executive vans, SUV's and mini-coach units.

We are an employer of local personnel with operations, chauffeur and support staff of over 60 people.

**The Philadelphia Regional Limousine Association** was founded in 1982 to promote the professional relationship of fellow operators and regulatory agencies, while keeping the consumer safety and interest as our main focus.

PRLA represents member operators from the Philadelphia region as well as those who are based in New Jersey, Harrisburg, Pittsburgh, Scranton and other regions of the Commonwealth. Member companies range in size from the single vehicle operation to companies who have a mixed fleet of equipment and number over fifty vehicles. Member companies are domiciled within the Commonwealth and from across the country and are private and publically owned with the largest percentage being owner/operator structured companies. All members of the PRLA have Pennsylvania Public Utility Commission granted authority to operate within the Commonwealth and most also possess Federal Department of Transportation Authority to operate on an interstate basis.

Most members are now also Philadelphia Parking Authority certificated operators allowing them to operate solely within the county of Philadelphia.

Members are all considered small businesses as they have under 500 people in their employ. Their staffs consist of local individuals from within their own specific geographic region and would typically include:

- Office staff- reservationist, dispatch, accounting, human resource
- Chauffeurs
- Vehicle maintenance personnel

Members utilize the services and products of local vendors for such items as Insurance, Vehicles, Vehicle maintenance shops, car washes, body shops, banks etc.

After discussing the issues with the members of the PRLA, I offer the following comments for consideration by the Commission:

**Adequacy of driver integrity standards.**

At present, the Commission has fairly lenient standards for drivers. We understand that these requirements are designed to cover all segments of the industry. In the limousine business we hold our drivers to a higher standard than for many other segments of the industry. It is our opinion that the Commission should expand the current standards. For example, while a carrier can be penalized immediately if a driver's license is suspended, unless the driver has a CDL, the carrier is not informed by PennDOT of the suspension, or it may take several months for the carrier to find out about the suspension. During that time, the carrier may be subject to fines imposed by the Commission. Additionally, the regulations do not clearly state the consequences for the carrier not conforming to those regulations. The PRLA will gladly work with the Commission to establish clearer requirements.

**Adequacy of vehicle safety standards.**

The PRLA has filed comments to the proposed change in Commission regulations which would replace the 8 year vehicle age rule with a 200,000 mile standard for limousines. I will not comment on the specifics of this proceeding, but invite the Commissioners to take a look at our comments. I do think that the proposed change does recognize the vast difference between the taxicab and limousine industry and the Commission should be encouraged to recognize these differences. Due to insurance requirements, plus the nature of the usage of limousines, a supervised wheels-off inspection should be required at different intervals. Further, a review of all of the Commission's cosmetic regulations should be undertaken. The very nature of the limousine business, the competitive nature of the business, and the generally higher costs of the luxury vehicles that are used by certificated limousine carriers is such that non-safety related

regulations are simply not applicable. Of all of the segments of the industry, our services are not a necessity and the market-place serves to police our industry.

### **Insurance requirements**

The Commission's regulations must be changed to reflect current insurance requirements and costs. Simply stated the current insurance coverage requirements are insufficient. For example, a \$5,000 property damage minimum may be sufficient to cover a parking lot accident for a stretch limousine. As virtually all of the PRLA members must meet the interstate requirements, PRLA suggests that the insurance requirements for Pennsylvania should be the same as for interstate transportation.

### **Elimination of the need standard.**

Presently there is no proof of need requirement for new entrants into the limousine business. Personally, however, I believe that unlike limousine service, other segments of the industry are utilized not for the special occasion but on an every day basis and should remain subject to the need requirement. For the new entrant in the limousine business, there should be some showing that the new entrant is fit to perform the service and that he has some support for the establishing of his business. I am informed by counsel that to eliminate the need standard would necessitate the modification of the Public Utility Code.

### **Rules for Transportation Network Companies**

The current system of regulation was established to protect the public as well as legitimately operating companies in matters of fitness, safety, and tariff charges. Any new

entrant should be held to the same standards as existing companies and be subject to the rules as a new entrant or as a broker of transportation services. Just as existing carriers must seek approval from the Commission for a change in rates, these companies should not to simply charge a market rate at the time service is secured.

If they are simply attempting to be a broker or used as a clearing house they should, at a minimum, be required to utilize only PUC certificated carriers for their services.

### **Enforcement of the Commission's regulations**

Enforcement officers should have the authority to seize the vehicles of all illegal non-certificated operators for repeat offenses regarding territory and safety issues. In our opinion, there exist too few enforcement officers to cover the state. Most of our members can relate stories of limousine carriers with out of state license plates providing service within the Commonwealth particularly to casinos just inside the Pennsylvania borders. While members have reported these instances, in our opinion there are too few Enforcement Officers to track this illegal activity. Some question arises as to what authority the Enforcement Officers can legally take to prohibit this unauthorized activity. For example, the PPA Officers are authorized to seize and impound vehicles for illegal operations. Enforcement Officer funding should be increased.

### **Conclusion**

Once again, thank you for permitting me to testify. The PRLA is willing to meet with any commission personnel to develop changes in Commission transportation regulations and procedures.