



Phase Two Engagement: Livery Transport Bylaw Review

Stakeholder Report Back: What We Heard

February 2021

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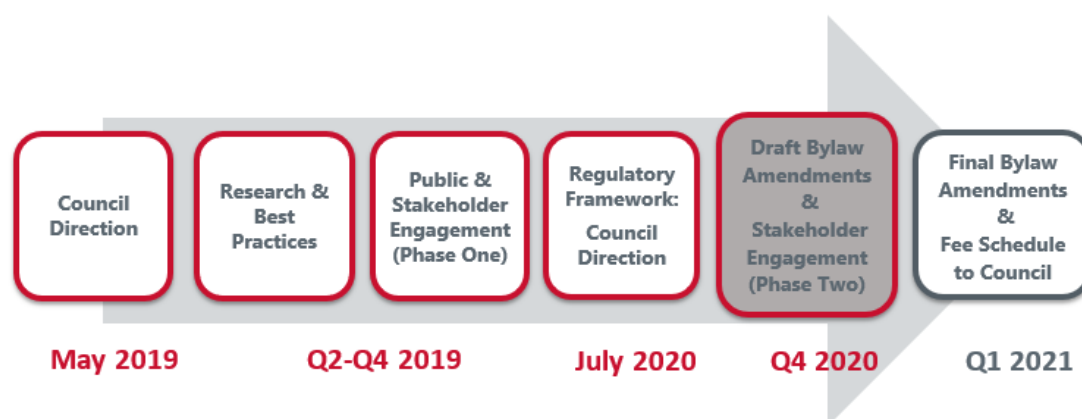
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Project overview

In 2019 May, Council directed Administration to complete an accelerated review of the Livery Transport Bylaw and associated fee schedule. The objectives of the Livery Transport Bylaw review are to:

- streamline regulations and operations;
- improve public and driver safety; and
- provide accessible, affordable and convenient choices for customers.

After receiving Council direction on 2020 July 28 on a regulatory framework for updating the Bylaw, Administration continued to investigate ways to further streamline regulations and draft regulatory amendments in alignment with Council direction.



Phase Two engagement overview

Phase Two engagement with industry stakeholders took place from November to December 2020. This process enabled us to share proposed Bylaw amendments with key stakeholders and gather feedback. This feedback was used to refine and finalize proposed Bylaw amendments that will help shape the proposed bylaw and its associated fee schedule.

Phase Two engagement activities

Due to the COVID-19 pandemic and public health and safety restrictions in place during this time, in person industry stakeholder engagement was not possible. Phase Two engagement with industry stakeholders continued through online surveys and/or virtual meetings upon request with broker or company representatives.

Industry online engagement included six online surveys specific to the following types of livery licences: Drivers (all sectors), Taxi Brokers, Limousine Brokers & Plate Holders, Transportation Network Company (TNC) Representatives, Taxi Plate Holders and Accessible Taxi Drivers & Plate Holders. Industry respondents had the opportunity to complete the survey(s) for each of their licence types. The online surveys were available through QuestionPro from November 23 – December 7, 2020 and distributed through a Livery Transport Services email bulletin and advertised on RED FM radio.



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Virtual meetings (via Microsoft Teams) were offered to all broker/company representatives interested in discussing the survey questions with the project team. Four virtual meetings were held independently from November 27 – December 11, 2020. The duration of each meeting was 1 – 2 hours.

How we communicated

The following methods were used to promote and communicate engagement opportunities to industry stakeholders.

Email Bulletins with Translation

Livery Transport Services Industry bulletins were distributed through Campaigner, an online distribution tool, to over 5000 industry members who sign up through an online form on calgary.ca/taxi or at the LTS front counter.

In order to reach the diverse audience of industry stakeholders, bulletins containing the surveys were translated in Amharic, Hindi, Punjabi and Urdu. Additionally, to help promote engagement opportunities, a RED 106.7FM Calgary radio campaign ran from 2020 November 26 - December 3 to remind or invite taxi, rideshare or limousine industry participants to complete the survey or sign up for industry bulletins to receive the surveys.

Providing a personal touch was important during this virtual engagement. The Acting Chief Livery Inspector gave a video welcome and thank you at the beginning of each survey to those industry stakeholder respondents completing the survey.

The following Campaigner bulletins were distributed to industry stakeholders:

Date:	Bulletin:	Communication Objective(s):
2020 November 16	Livery Transport Bylaw Review Phase 2 – Industry feedback	What to expect from Phase Two industry engagement.
2020 November 23	Livery Transport Bylaw Review Phase 2 Engagement - Industry online survey <i>Translation provided in Amharic, Hindi, Punjabi and Urdu.</i>	<ul style="list-style-type: none">• Access to links to six industry online surveys.• Background on the Bylaw Review project to date.
2020 November 30	REMINDER: Livery Transport Bylaw Review Phase 2 Engagement - Industry online survey. <i>Translation provided in Amharic, Hindi, Punjabi and Urdu.</i>	<ul style="list-style-type: none">• Reminder to complete the survey(s) and of the closing date.• Links to the industry online surveys.• Background on the Bylaw Review project to date.

Participation

A total of 321 respondents completed the online surveys.



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Survey Responses by Industry Sector

Industry Sector:	Number of Surveys Completed:
Drivers (all sectors)	159
Taxi Brokers	8
Limousine Brokers & Plate Holders	11
Transportation Network Company (TNC) Representatives	49
Taxi Plate Holders	78
Accessible Taxi Drivers & Plate Holder* * Results of this survey will be used to inform the upcoming Accessible Taxi programs Council report.	16

A total of 4 virtual meetings with brokers and TNC representatives were requested and held.

What we asked and why

The following section describes the common themes and specific questions asked of stakeholders through multiple industry surveys.

Key Themes	Who we asked	What we asked	Why we asked
Upfront pricing offered by taxi brokerages	Taxi Brokers	<ul style="list-style-type: none">How soon do you foresee being able to offer upfront pricing based on soft meter technology?What are the challenges to implementing the upfront pricing option after it is approved within the Bylaw?What do you think will be the benefits to the customer if the upfront pricing option is offered?What do you think will be the benefits to your industry, particularly drivers, if the upfront pricing option is offered?If a brokerage decides to offer upfront pricing to its street hail and dispatch taxi customers, should the customer have the option to pay at the beginning of the trip?	The Bylaw will be amended in alignment with Council direction to allow upfront pricing to be provided by taxi brokers to street hail and dispatch customers as long as the pricing does not exceed the City regulated meter rate.

Key Themes	Who we asked	What we asked	Why we asked
	Taxi Drivers	<ul style="list-style-type: none"> If your taxi brokerage decides to offer upfront pricing to street hail and dispatch customers instead of the taxi meter running the price, what are your concerns about this approach for you? For the customer? What do you think will be the benefits to taxi drivers, if the upfront pricing option is offered by the taxi brokerage? If a taxi brokerage decides to offer upfront pricing to its street hail and dispatch taxi customers, should the customer have the option to pay at the beginning of the trip? 	
Digital submission of licensing documentation	All Participants	<ul style="list-style-type: none"> What type of livery licensing should be provided on-line versus in-person? What are your ideas on streamlining the document submission process? 	The City is exploring digital submission of licensing documents where it is possible to accommodate them.
Making driver requirements similar across sectors	All Participants	Proposed changes to Sections 85, 86 and 87 of the current Bylaw regarding driver requirements were provided in several surveys. Please refer to Appendix A – Driver Comparison Table . Indicate if you have concerns with any of these changes shown in Bylaw Sections 85, 86, or 87), and why.	Given the similar safety and service expectations of all livery drivers operating a vehicle, the amended Bylaw will focus on the expectations of all drivers, regardless of sector.
Clarifying and streamlining taxi plate holder obligations	All Participants	A list of current and proposed Bylaw regulation changes for all plate holders were provided in several surveys. Please refer to Appendix B – Plate Holder Obligations . Please describe your concerns or comments for each change.	As part of clarifying and streamlining our plate holder regulations for taxis, The City is considering a few changes to the Bylaw.
Systemic racism	Drivers Brokers and TNC reps	<ul style="list-style-type: none"> Have you experienced racism as a driver in the livery industry? (Optional) If you have experienced racism as a driver, please feel free to share examples of your experiences Have you heard from your drivers that they have experienced racism as a driver in the livery industry in Calgary? 	The City of Calgary acknowledges the existence of systemic racism and is committed to listening to, and learning from, those who have been impacted by it, and taking concrete actions

Key Themes	Who we asked	What we asked	Why we asked
	All Participants	<ul style="list-style-type: none"> Have you heard from your customers that they have experienced racism while using livery services in Calgary? What are your suggestions on how The City could better prevent and address racism occurring in the industry? 	to identify and address factors that might contribute to racism within the organization, and across the community.
Accessible Taxi & WAV Calgary	Accessible Taxi Drivers and Plate Holders	Administration also engaged stakeholders on the Accessible Taxi Incentive Program and the Wheelchair Accessible Vehicles pilot. This information will be used to inform future reports on accessible taxi programs.	
Other regulations to streamline or clarify Bylaw requirements or improve safety	All Participants	Are there any other regulation changes you would propose to apply to help streamline or clarify the Bylaw requirements, or improve driver or public safety?	The City is interested in hearing industry's suggestions to streamline or improve the Bylaw.

What we heard

All online surveys and virtual meeting responses were reviewed and analyzed for themes. These are the key themes of what we heard from industry stakeholders:

<p>Key theme: Upfront pricing for taxis is generally considered beneficial to industry and customers; route/trip changes, customer communication and technology updates were key concerns.</p>
<p>What we heard</p> <p>Benefits to drivers: Many participants indicated that upfront pricing would be beneficial. Drivers indicated the most common benefits to them would be:</p> <ul style="list-style-type: none"> They believed there would be fewer disputes regarding the fare It simplifies the payment process. Will make it safer Competitive in the industry Transparent with less fraud with payment from the customer <p>Taxi brokers thought that eliminating stress for drivers and reduced fare jumpers/taxi fraud were the most common benefits for drivers.</p> <p>Benefits to the customer: The taxi brokerages also believed that transparency of the trip cost is a benefit if the upfront pricing option is offered. The most common benefits indicated by the taxi brokerages include:</p> <ul style="list-style-type: none"> Customers know the trip cost Less conflict over route taken

- Less complaints/calls to Calgary Police Service (CPS)
- Reduces fare evasion

Driver concerns:

When asked if taxi drivers had any **concerns** about the upfront pricing offered by taxi brokerages, many drivers expressed concerns about:

- How a fixed lower price may impact their income
- Customers changing the trip (unnecessary or additional stops)
- The impacts of trip changes due to unexpected road conditions due to weather and traffic.
- Some disagree with upfront pricing and believe the price should be based on meter.

Broker concerns:

Taxi brokerages were asked about what they think the challenges are to implementing the upfront pricing option after it is approved within the Bylaw. The taxi brokerages also had similar concerns related to route changes by the customer. The main challenges shared by the taxi brokerages includes:

- System needs to accommodate route changes by customer
- Will take time for customers to get used to it
- Take time for dispatching software to program/update the changes
- Difficult if upfront payment not mandated across taxi industry

If a taxi brokerage decides to offer upfront pricing for street hail and dispatch taxi customers almost all the driver participants responded the customer should have the option to pay at the beginning of the trip. The taxi brokerages were asked the same question and the majority of the brokerages also responded in favour of the option.

Taxi brokerages were asked how soon they foresee they would be able to offer upfront pricing based on soft meter technology most of the brokers indicated Q3 or Q4 of 2021.

Key theme: Digital submission of licensing documents is supported by industry.

The following are the most common livery licensing types the driver participants indicated that should be provided online versus in person: (in no particular order)

- All livery licensing types
- Taxi licence
- TNC licence
- Renewal of licence/plate

Additionally, some driver participants believed mechanical requirements should be provided online.

The taxi brokerages were asked a similar question from a broker's perspective and all indicated yes, they would like the flexibility to utilize online licensing options including submission of documents. When asked to indicate what type of livery licensing should be online versus in person, the most common responses from the brokerages were:

- Mechanical inspection reports
- Licence renewals

The limousine brokers and plate holders also believed mechanicals should be provided online. Additionally, limousine brokers suggested mechanical inspection reports should go directly from the mechanic to Livery Transport Services (LTS) to prevent tampering.

When drivers were asked about their ideas on streamlining the document submission process most drivers suggested an electronic submission process with specific suggestions such as:

- Online portal/platform
- Website to submit documents
- Cloud to transfer files to
- Email documents to LTS
- LTS App

Similar to drivers, taxi brokerages shared ideas of being able to scan and upload documents online and some indicated being able to submit documentation like TNCs.

Limousine brokers and plate holders also suggested submitting documents online.

Key theme: Driver requirements should be mostly similar across sectors.

Section 85:

When asked if drivers had any concerns with any of the proposed changes to driver requirements in [Section 85](#) of the current Bylaw, most drivers indicated that they had no concerns and support this change. Most taxi and limousine brokerages and limousine plate holders also indicated that they had no concerns and requirements should be similar across livery sectors.

A TNC representative expressed concerns about [Section 85\(e\)](#), indicating that drivers should not be held responsible for items lost by riders, and [Section 85 \(i\) and \(j\)](#), "...given that drivers are legally not to operate an unsafe vehicle, and ridesharing companies don't own the vehicle, it is not necessary for drivers to notify the TNC."

Section 86:

When asked if drivers had any concerns with any of the proposed changes to [Section 86](#), the driver's reactions were mixed, some drivers indicated that they had no concerns while some were concerned about provision (h. 1).

When the taxi brokerages, limousine brokerages/plate holders and TNC Representatives were asked the same question, most indicated that they had no concerns/no objection while some believe requirements should be the same for all sectors.

Section 87:

Most drivers, taxi brokerages, limousine brokerages/plate holders and TNC Representatives had no concerns with any of the proposed changes to [Section 87](#).

Key theme: Proposed changes to taxi plate holder obligations had mixed reactions.

Section 71.1 (3):

When the drivers were asked if they supported the proposed change to Bylaw [Section 71.1 \(3\)](#), if a Taxi Plate Licence or Accessible Taxi Plate Licence is not renewed within 30 days after expiry, the plate may be revoked **without** a Licence Review Hearing; their responses were mixed with some not supporting the proposed change due to emergencies and some supported what is currently in this section of the bylaw.

When taxi brokerages were asked the same question their reaction was also mixed with the following themed responses similar to what the drivers expressed:

- Should be 90 days or more than 30 days
- Should still have ability for licence review hearing
- Licence review hearing if they contact LTS within 90 days

Most taxi plate holders did not support this change due to emergencies and being stuck overseas and some wanted to keep the current requirements.

Sections 89.03(3), 90.2(3), and 97.1:

Drivers, plate holders and brokers were asked if they supported the proposed change to Bylaw [Sections 89.03\(3\), 90.2\(3\), and 97.1](#) as shown in Appendix B to **remove** the requirement for all taxi plate holders to drive a minimum number of hours per year, and **keep** the requirement for the vehicle attached to any Taxi Plate Licence to be driven a minimum of 250 days per year. Most drivers and plate holder respondents support the proposed change, while most taxi brokerages were against the proposed change and stated the need of accountability for the plate owner to work in the industry.

Section 100 & 101:

Drivers, plate holders and brokers were asked if they supported the proposed change to Bylaw [Section 100 & 101](#) to **remove** the exception of the renewal fee. Most drivers and plate holder respondents were in favour of this proposed change, while most taxi brokerages believed that the fee a plate holder charges is for cost recovery, not subleasing and this proposed change will not solve the subleasing issue.

Key theme: Drivers have experienced **racism** in their work; **public awareness** and **driver training** were common suggestions to prevent racism.

Experiences with racism as a driver:

When driver respondents were asked if they have experienced racism as a driver half of the total respondents indicated that they often and sometimes experience racism. When taxi brokerages were asked if they heard from their drivers if they have experienced racism all indicated rarely or sometimes. Limousine brokerages had a varied response with some indicating sometimes, some rarely and some never.

Drivers were given the optional question to share examples of their experiences of racism as a driver. The common experiences from the examples shared are:

- Because of my race, appearance and ethnicity
- Insulted, called names, racial slurs by customers
- Customer told me to go back to my country

Experiences with racism as a customer:

Taxi brokerages, limousine brokerages and plate holders, and TNC representatives were asked if they have heard from customers experiencing racism while using livery services in Calgary. Taxi and limousine brokers indicated they have rarely or never heard from customers experiencing racism from using livery services. A TNC representative indicated at this time, this information is not readily available but they are conducting additional review and will provide input in the future.

Suggestions on how The City could better prevent and address racism:

The most frequent suggestions from the drivers were:

- Communication and public awareness
- Driver training/education (i.e. annual seminar)
- More City enforcement (reporting racism, issuing fines/penalties, protect drivers from racism)
- Video recording of trips as evidence
- No racism signage/sticker to post in vehicle

Taxi brokerages suggestions/comments included:

- Drivers need to know how to deal with issue safely
- Broker protocols after an issue, such as blacklisting a customer, walk driver through their options
- Training by experts made available to drivers, sponsored by LTS
- Nothing can be done through licensing or enforcement
- Racism exists in society

Limousine brokerages/plate holders suggestions included:

- Public awareness (social media)
- Education/training

Specifically, a suggestion for a logo that stands for 'racism is not acceptable' to be placed on the window or behind the passenger seat of a limousine was provided.

A TNC representative suggested that The City have public awareness initiatives on The City's position of acknowledging systemic racism and commit to and promote its position as an anti-racist municipality and share how they will achieve this objective.

Key theme: Many drivers and taxi plate holders have considered becoming **Independent Taxi Operators**; business and insurance costs and a need for central dispatch were indicated as common concerns or comments.

Most driver and taxi plate holder respondents indicated that they have considered operating as an independent taxi operator.

Drivers were asked if they had any concerns about becoming an independent operator, the majority responded they did not. Of the drivers who indicated they did, their concerns included:

- Not enough protection/security
- The cost of the fees to operate
- The insurance costs

When taxi plate holders were asked the same question, over half of them responded they did not have concerns. Of the plate holders who indicated they did, their concerns and comments included:

- The need for a central dispatch

- Cost of business
- Cost of insurance
- Not enough business

The drivers were also asked what regulation or licensing changes would make it more attractive to be an independent taxi operator. The themes regarding the suggested changes from the drivers include:

- A central dispatch system (City controlled)
- Plates with drivers not brokers
- Open the plate system to all

When taxi plate holders were asked the same question, the themes were comparable to the concerns shared in the previous questions. The suggested changes from the plate holders include:

- Allow own individual insurance/simplify insurance regulations
- Central dispatch (City)
- Reduce fees
- Simplify regulation

Additionally, when responding to this question some plate holders expressed their concerns about taxi brokerages and the fees they charge.

Key theme: One recurring theme for suggestions of **regulation changes to streamline the Bylaw** across stakeholders was reducing fees. The remaining suggested changes were diverse and sector or stakeholder specific.

While many drivers did not have any other regulation changes to propose, some themes of the suggestions provided include:

- Driver should be responsible for vehicle insurance
- Issue plates to drivers who have an active driver's licence and licences should be returned if not actively driving
- Extend the life of the vehicle in the Bylaw requirements

Taxi brokerages suggestions include:

- Six month inspections for all livery vehicles
- Fairness in industry by capping TNCs or deregulate taxis
- Fees too high for taxis and limousines compared to TNCs
- All drivers and vehicle registration fees should be the same across sectors.

Most limousine brokerages/plate holders suggested to streamline requirements to reduce fees.

Taxi plate holders provided a wide range of responses to this question which did not correspond with a key theme. Please refer to the [Summary of input – Taxi Plate Holders](#) to see some verbatim quotes.

The TNC rep responses were diverse on this topic, however the most common theme that emerged was about drivers wanting more pay and a few mentioned reducing livery fees. Although the TNC Representative survey was intended for TNC company representatives, it appears drivers may have responded to some questions.

When a confirmed TNC Representative responded to this question, detailed suggestions were provided regarding streamlining the regulations including:

- Allow for Transportation Network Driver's Licences (TNDL) to be facilitated electronically directly between the City and ridesharing companies
- Acceptance of documents timeframe
- Vehicle inspections document as a separate document (not included in TNDL)
- Reduce costs and fees (similar to recent taxi fee reduction)
- Fee structure, implement a per-trip fee to recover livery costs in place of per-driver/vehicle fees.

Summary of Input by Livery Licence Type

Included in the summary of input is feedback in detail from online surveys and virtual meetings with industry stakeholders.

Industry participants were asked to fill out the survey(s) specific to the livery licence(s) they currently hold. Click below on a listed *summary of input* to go directly to that section of the report. Click on a listed *survey* to view a specific survey.

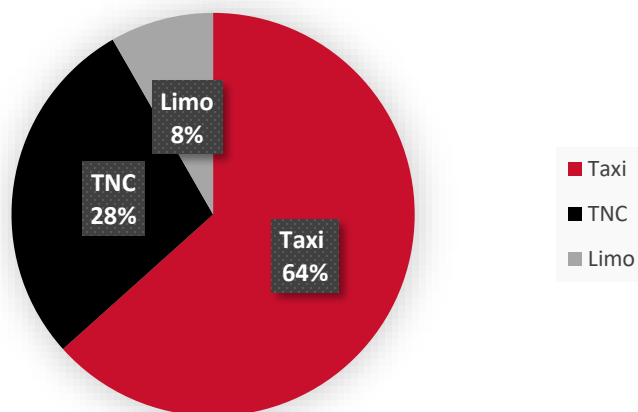
Summary of input:	Survey:
Drivers (all sectors)	Drivers (all sectors)
Taxi Brokers	Taxi Brokers
Limousine Brokers and Plate Holders	Limo Brokers and Plate Holders
TNC Representatives	TNC Representatives
Taxi Plate Holders	Taxi Plate Holders

Summary of input – Drivers (all sectors)

Driver survey participants from all sectors were asked to select which livery driver licence(s) they currently hold. 64 per cent indicated they currently hold a taxi licence, 28 per cent hold a TNC licence and 8 per cent hold a limousine licence.



Please select which livery driver licence you currently hold?



Upfront pricing for taxis

Taxi drivers were asked several questions: If your taxi brokerage decides to offer upfront pricing (agreed-upon price with customer prior to the ride) to street hail and dispatch customers instead of the taxi meter running the price, what are your concerns about this approach and what do you think would be the benefits to taxi drivers. Their concerns include:

- How a fixed lower price may impact their income
- Customers changing the trip (unnecessary or additional stops)
- The impacts of trip changes due to unexpected road conditions due to weather and traffic
- Some disagree with upfront pricing and believe the price should be based on meter

Verbatim quotes:

"It's bad for the driver since the brokers are going to lower their prices (the fare only & not the standrent) to gain the market back. The customer will gain for a period of time. On the long run the customer will pay more when the war price stop and an agreement will be made between brokers and other companies in the market"

"What happens if the 'upfront' price is being exceeded due to a traffic jam or construction or something beyond the driver's control? What happens if the customer wants to or has to make changes to their travel plan?"

"I would still prefer to go by the taxi meter running pricing it it has been set up by inputting all the incurred expenses."

The benefits of upfront pricing indicated by the drivers include:

- There would be less disputes regarding the fare and it simplifies the payment process
- Upfront pricing will make it safer



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DRIVER INPUT

- Competitive with other players in the vehicle-for-hire industry
- Transparent with less fraud with payment from the customer

Verbatim quotes:

"Ease of agreement and no dispute over pricing"

"It would simplify the payment process, especially if it's a cash payment"

"Safer and no need touch cash and cards of the passengers as well as passengers have less contacts too"

"It is a great idea to give upfront pricing. It gives reassurance to the customer knowing what the fare is going to cost. It might help bring back business to the taxi industry."

"It will put regular taxis in line with other TNCs and customer will know what exactly will cost for trip before trip begins."

"You get the money at the beginning, this reduce fraud"

Digital submissions

The drivers from all sectors were asked what type of livery licensing should be provided online versus in-person and to share their ideas on streamlining the document submission process. The majority of the drivers believe all livery licensing types should be provided online and many suggested that an online portal/platform to submit licensing documents to The City is a good idea.

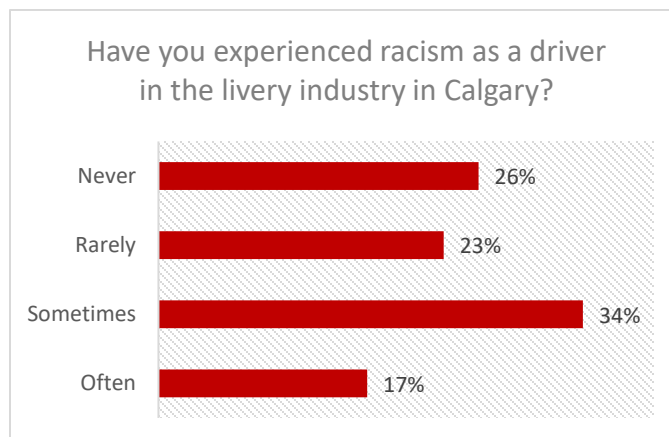
Verbatim quotes:

"All required licensing. We should be able to scan a document and upload the PDF version."

"There should be online platform for submission of scanned documents"

Systemic racism

Through a multiple choice question, the drivers from all sectors were asked if they have experienced racism as a driver in the livery industry in Calgary. The responses from this question are displayed in the following chart:





For those respondents who have experienced racism as a driver, they were asked an optional question to share examples of their experience. The drivers were assured that their experiences shared will not be attributed to a specific individual or company.

The themes from the experiences shared are:

- Because of my race, appearance and ethnicity
- Insulted, called names, racial slurs by customers
- Customer told me to go back to my country

Verbatim quotes:

"Color of skin is a target then depending on the type of racist you get Some feel if driver is scared or small guy they are big trouble then"

"Like sometimes customers ask why you came here, go back to your country, hey dog (to driver) stop here."

"Every Driver faces such racial slurs once a while"

"The most common telling me is I should go home to my country even though I leave in this country 3/4 of my life."

The drivers were asked to provide suggestions on how The City could better prevent and address racism occurring in the industry and can include changes to, but are not limited to: driver training and communication, City regulations, licensing and enforcement practices, and public awareness initiatives.

Common themes from the suggestions provided are:

- Communication and public awareness
- Driver Training/Education (annual seminar)
- More City enforcement (reporting racism, issuing fines/penalties, protect drivers from racism)
- Video recording of trips as evidence
- No racism signage/sticker to post in vehicle

Verbatim quotes:

"Racism is systemic and public awareness information should be intensified"

"There should be more public awareness and better enforcement practices as well as more punishment for the offenders"

"The way driver is taught by LTS or broker during training, not to comment or argue with customer on anything which offends someone, similarly customer should restrain doing this. For this customers need to be more aware of things and there should be visible sticker to reminding customer about this."

"Inside camera with voice and video capabilities, priority support for drivers when needed"

"Well no verbal or physical abuse should be tolerated weather are they drunk or not should display on taxis just like on hospitals or other places shown for their staff."

Driver awareness

The City would like to help new drivers better understand their rights/roles as a self-employed contractor in the livery industry. Drivers from all sectors were given a list of possible ways to help new drivers and were asked to select all that apply. The results are displayed in the following chart:



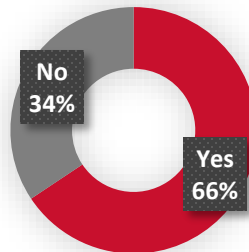
For the drivers who selected '**other**,' some further specified driver training and indicated that it should include more real examples and to spend more time on this topic.

Independent taxi operator

Driver participants were asked (yes/no) if they have considered operating as an independent taxi operator rather than driving for a broker. 66 per cent selected "yes," they have considered it while 34 per cent selected "no".

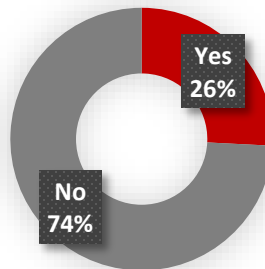


Have you considered operating as an independent taxi operator rather than driving for a broker?



The drivers of all sectors were asked if they had any concerns about becoming an independent operator and if yes, to specify those concerns. 74 per cent selected “no,” while 26 per cent selected “yes.”

Do you have any concerns about becoming an independent operator?



While most drivers expressed that they had no concerns, the drivers who indicated ‘yes’ specified they had concerns regarding:

- Not enough protection/security
- The cost of the fees to operate
- The insurance costs

Verbatim quotes:

“Customers, Vehicle, Insurance is a big thing. Only one company insurances taxi vehicles and insurance is very high. A taxi driver is losing business left and right. Owning and operating a cab yourself is not in the best interest. Working for a company and supervisors assisting and handling situations is important. Another factor is that Calgary Police Service will not take taxi drivers as first priority. In fact, you are last. It takes about 2-3 hrs for a CPS to come to the scene.”

Drivers were also asked what regulation or licensing changes would make it more attractive to be an independent taxi operator. The themes we heard from the drivers regarding the suggested changes to make it more attractive include:

- A central dispatch system (City controlled)
- Plates with drivers not brokers
- Open the plate system to all

Verbatim quotes:

"All registered taxi drivers should be given an independent operator taxi plate to operate in the city and all these drivers should be managed by Livery lead app. This will allow competition and safety . Centrally managed app for all taxi drivers regardless of brokerages or independent operators"

"Plates to be given to drivers not companies or brokers. Plates to be returned to city when not needed. Drivers to follow fare rules. Drivers to be consulted."

"Just open the licenses. Please take all the plates from company and distribute those to senior drivers who work long for this city"

Clarifying and streamlining taxi plate holder obligations

As part of clarifying and streamlining our plate holder regulations for taxis, The City is considering changes to the Bylaw. The drivers were asked to describe any concerns or comments for each change in Bylaw [Sections: 71.1\(3\), 89.03\(3\), 90.2\(3\), 97.1, 100 and 101](#), and to provide suggestions to improve the proposed change. The first question asked if they supported the proposed change to the current Bylaw [Section 71.1\(3\)](#), where if a T.PL. or A.T.P.L. is not renewed within 30 days after expiry, the plate may be revoked **without** a Licence Review Hearing. The drivers' responses were mixed with some not supporting the proposed change due to emergencies and some supported what is currently in this section of the bylaw. Additionally, drivers requested to increase the renewal period to more than 30 days with reminders/notifications from The City upon renewal.

Verbatim quotes:

"Renewal period must more than 30 days. The plate holders must be given some reminders in certain period of time. If the plate holder is visiting overseas and stuck there due to some reason. So be on the generous side and give around 6 months of renewal period with email and phone and mail reminders."

"Disagree. One should be given at least two chances for clarification after 30 days expiry. One may be on emergency that had taken longer than 30 days to recover."

"The present rule seems to give the driver a chance whereas the new rule seems to take it away"

Most drivers were in favour of the proposed changes regarding Bylaw [Section 89.03\(3\), 90.2\(3\), 97.1, 100 and 101](#).

Verbatim quotes:

Section 89.03(3), 90.2(3), and 97.1:

"I am in favour of proposed change there shouldn't be any requirement for 981 hours"

Section 100 and 101:

"The proposed change is good for the driver and should take away some of the unfair practises of some plate holders"

Additional regulatory requirements

The drivers were asked if they had any other regulation changes they would like to propose to apply to all taxi plate holders to help streamline or clarify the Bylaw requirements, or improve driver or public safety.

While many drivers did not have any other regulation changes to propose, some themes of the suggestions provided include:

- Driver should be responsible for vehicle insurance
- Issue plates to drivers who have an active driver's license and licenses should be returned if not actively driving
- Extend the life of the vehicle in the Bylaw requirements

Verbatim quotes:

"there should be provisions for own taxi insurance"

"Plates should be given drivers and when not working return to city not to be sold from one to another for profit. Plate holders should only actual drivers.."

"The Vehicle Life should be extended to 15 years after 10 years if the vehicle is mechanical fit and safe to operate"

Driver requirements

The drivers were asked to indicate if they had concerns with any of the proposed changes to Bylaw Sections 85, 86 and 87 in a [driver comparison table](#) as provided for reference in Appendix A of this report.

Most drivers indicated that they had no concerns and supported the changes with Bylaw Sections 85 and 87.

Verbatim quotes:

Section 85:

"Yes. The proposed changes will benefit the customer - which should be all of our end goal"

Section 87:

"No concerns. Sounds reasonable"

When asked if drivers had any concerns with any of the proposed changes to [Section 86](#), the drivers' reactions were mixed. Some drivers indicated that they had no concerns while some were concerned about (h. 1) where The City is proposing a driver who holds a Taxi drivers licence (TDL) "may charge a passenger a fee of up to \$250 for soiling the interior of the Taxi or Accessible Taxi...". Some drivers believe it should



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apply to all drivers. Some drivers do not support removing (i) where The City is proposing to remove a driver “shall have eight consecutive hours off duty in any twenty-four hour period.”

Verbatim quotes:

“86(h.1) Why does this not apply to all drivers? It should not be just taxis.

86(i) This Should NOT be removed. A driver may elect to work more than 16 hours out of 24, but should not be forced to. By removing this condition there is no recourse for a driver who may want 8 hours off in 24.”

“h.1 should apply to all

“I should not be removed”

“8 Hr rest is mandatory for safe driving in 24 hr. shift. Do not remove this clause. This suggestion is foolish.”

TAXI BROKER INPUT

Summary of input – Taxi Brokers

Upfront pricing for taxis

The taxi brokerages were asked how soon they foresee they would be able to offer upfront pricing based on soft meter technology, most of the brokers indicated Q3 or Q4 of 2021.

When the taxi brokerages were asked about what they think the challenges are to implementing the upfront pricing option, the taxi brokerages mentioned similar concerns to drivers regarding route changes by the customer during the trip and how that might impact the upfront price. The main challenges shared by the taxi brokerages include:

- System needs to accommodate route changes by customer
- Will take time for customers to get used to it
- Take time for dispatching software to program/update the changes
- Difficult if upfront payment not mandated across taxi industry

Verbatim quotes:

“... One of the challenges might be getting customers to use upfront pricing and trust that the price quoted is an accurate one. Another challenge is determining a cost if the customer decides to take a detour to a different destination or get food on the way home. A system to allow for those kind of changes will have to be developed”

“Definitely in favour, for all taxi companies, using the same method, right across the board. Taxi industry as a whole, upfront pricing for all taxis. It has to be system that works flawlessly. If ride changes half way, (eg to the airport but passenger forgot airport) the system has to work with this, and manage to accomplish this. I can tell you the issues and challenges from sedan. Education needed for driver and passenger, system



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has to work properly to account for change. Complaints we get... assumes \$48 if advertised, but asks for a different route. The tech has to be smart. Revert back a meter if needed."

Similarly, taxi brokerages were asked about what they think will be the benefits to the customer and to the drivers if the upfront pricing option is offered. The most common benefits indicated by the taxi brokerages included:

Benefits to customers	Benefits to drivers
<ul style="list-style-type: none">Customers know the trip cost	<ul style="list-style-type: none">Reduce fare jumpers/taxi fraud
<ul style="list-style-type: none">Less conflict over route taken	<ul style="list-style-type: none">Drivers' peace of mind/ eliminates stress
<ul style="list-style-type: none">Less complaints/calls to CPS	
<ul style="list-style-type: none">Reduces fare evasion	

Verbatim quotes:

"Reduction in fare jumpers/taxi frauds, increased safety for drivers as in many cases fare disputes have resulted in confrontations and injuries."

"The benefit for the drivers and customers is knowing what the fare is upfront and from the customer side they don't have to worry about the driver being directed by GPS, being directed the long way. If the driver goes the long way they don't have to pay more. Will eliminate fare disputes because it's already an agreed upon price. Get rid of problems with \$30 deposit and fare jumpers. Biggest problems drivers have today. Influx of people jumping the fare or getting to the other end and they don't have money. The deposit didn't resolve the situation...just created a whole bunch of new problems. Customer will know what the price is upfront as long as they don't deviate from that route."

When asked whether customers should have the option to pay upfront when upfront pricing is offered to customers, most brokers responded 'yes' however the detailed responses were mixed – some think that it should be optional whether the customer pays upfront or at the end of the trip as it depends on the type of customer, while others felt that upfront payment should be mandatory, either at night or 24 hours a day, and required by the Bylaw to prevent fare disputes and protect the driver.

Verbatim quotes:

"I would suggest it should be paid in advance as this would eliminate the need for driver requesting a deposit which has are many of the fare complaints which are received."

"I think in some respects you need to keep it both ways depending on the kind of customer, could be an account customer. It should be an optional thing if they want it. We could do it today – just change and be a TNC and it wouldn't be optional. I think it should be optional."

"Prepayment should be mandatory in the bylaw for all companies. The current \$30.00 deposit caused friction with the customers. "

Digital submissions

Taxi brokers were asked about their interest in moving towards electronic submission of licensing documents and other ideas on how to streamline the document submission process.

All brokers who responded indicated they were interested in online licensing options. When asked to indicate what type of livery licensing should be online versus in-person, the most common responses from the brokerages were mechanicals (mechanical inspections) and licence renewals, although there was interest in numerous other on-line licensing options, and being able to submit documentation like TNCs.

Verbatim quotes:

"A lot of stuff today could easily be done through electrified document submission. Not much point to going to the office unless it's some specialty thing. Just a first time licence should appear in person."

"I certainly believe that online licensing options should be made available to the taxi industry just as they are for TNC's. Mechanical inspections should be sent in electronically, and drivers should have the flexibility to renew their badges and do new car setups online. Getting rid of the taxi plate and having a portal for the brokers to let LTS know if a car is on or off the road would stream line the process and also reduce the fee to the taxi industry because LTS claims plate management is the biggest expense. More discussion with LTS regarding what other online options could be made available for taxis is necessary."

Stand rent
When we asked brokers to provide us with the types of expenses typically included in the stand rent they charge to drivers and plate holders, most did not want to provide this information as it was seen as being a private business matter and proprietary information. Some provided examples of expenses which covered a range of business costs.

Verbatim quotes:

"The information about our stand rent is "proprietary" and not open for public consumption. All taxi companies offer different services to their drivers. We are a private business. To my knowledge you don't ask any other business to breakdown their expenses. The issue is some drivers and City Council members make too many assumptions about the industry."

"The stand rent charged to drivers and plate owners, include the following operational costs such as dispatch operational fees, provincial licensing, liability insurance, collision fund insurance, equipment rental for dispatch equipment, such as tablets, credit card processing machines, data costs, printers top lights and decals on taxi. Also covered is processing fees for credit and debit card processing fees for transactions and the Accessible incentive fee charged by the City."

"2% deposit on debit and credit, stand rent, city surcharge, interest on loan payments."

Driver requirements

When brokers were asked about proposed changes to provisions in [Sections 85, 86 and 87](#) of the current Bylaw making similar requirements for drivers in all sectors, most indicated that they had no concerns/no objection while some believe requirements should be the same for all sectors.

Verbatim quotes:

Section 85: *"No concerns. All sectors should be the same and have the same requirements, whether a taxi, limo or TNC. Drivers should be required to conduct themselves in the same manner. TNCs seem to be only ones who don't have to comply right now. Has to do with customer safety, appearance of industry and company as a whole. All companies should have to do the same thing."*

Section 86: *"regulation should be the same for all sectors"*

Section 87: *"No concerns. Should be right across the board for all."*

Systemic racism

When taxi brokerages were asked if they heard from their drivers if they have experienced racism as a driver in the livery industry they indicated either rarely or sometimes. Most brokerages indicated that they have rarely heard from customers experiencing racism while using livery services in Calgary.

When the brokers were asked what their suggestion on how the City could better prevent and address racism occurring in the industry, their suggestions/comments included:

- Drivers need to know how to deal with issue safely
- Broker protocols after an issue, such as blacklisting a customer, walk driver through his options
- Training by experts made available to drivers, sponsored by LTS
- Nothing can be done through licensing or enforcement
- Racism exists in society

Verbatim quotes:

"I'm not sure that with the minimal amounts of issues we see or hear about anything can be done through licensing or enforcement practices to totally limit any types of racism, unfortunately there is a small amount of naïve individuals in society that are racists and bigots and I cannot see that will ever change."

"Racism does exist everywhere to one degree or another. It doesn't matter where you go or where you work or what you do. When a driver brings a racist concern to our management team we will walk the driver through what his options are. We have a set process on how to deal with these situations. It's more important that the drivers know how to deal with the issue and keep a level head and not elevate a situation where a driver could get injured. Training or instruction by experts in the field could be made available to drivers on an on-going basis. The training should be sponsored by LTS."

"We have a process when a driver complains. Important part is to review and spend time with driver. Life experience is the best training. Take the time to coach them, and how in the future how to avoid situation."

Vehicle markings/requirements

Brokers were asked several specific questions about proposed changes to vehicle markings for taxis.

In the first question, they were asked whether they would like the option to place a light indicator in the front windshield to show when the taxi is in or out of service rather than the traditional top light on the roof of the taxi. Most of the brokers who responded liked the idea of having the option.

The second question asked whether they would like an option to place the taxi plate number in a different location than currently - where the plate is attached to the back of the vehicle - while maintaining visibility, there were mixed responses. Of those that said “yes” to a different location, a decal in the rear window instead of attaching a plate was the most common theme and having livery work with the broker to have a car taken out of service versus a physical plate returned.

“It is archaic to be drilling holes into a vehicle and attaching a taxi plate to it. There are better options and more efficient and cheaper options for the industry without damaging the taxi. Either a decal in the back window like the TNC’s and the limousine industry has. If the plate is only to pull a vehicle out of service, that is the wrong reason to continue down the pathway. If a car needs to be pulled out of use, you can work with the brokers to suspend the vehicle. If the broker doesn’t comply with suspension you fine the brokerage for non-compliance.”

“Just remove the need for a metal plate being screwed into the vehicle, why not use a city designed sticker”

Clarifying and streamlining taxi plate holder obligations

Brokers were asked about their concerns or comments regarding three proposed changes to taxi plate holder obligations in the Bylaw.

The first question asked if they supported the proposed change to the current Bylaw [Section 71.1 \(3\)](#), where if a T.PL. or A.T.P.L. is not renewed within 30 days after expiry, the plate may be revoked **without** a Licence Review Hearing. The brokers generally had concerns with the proposed change as circumstances in plate holders’ lives should be taken into account, and suggested the following changes:

- Should be 90 days or more than 30 days after expiry
- Should still have ability for a licence review hearing
- Licence review hearing if they contact LTS within 90 days

Verbatim quotes:

“I have a concern. 30 days with the stuff that’s going on, the fact that the licences are still controlled, I find it problematic that it’s only 30 days. There are things that go on in people’s lives that they’re unable to attend. I would suggest it be extended to 90 days with an option to have a hearing absolutely has to stay there. Not every circumstance warrants it, but you have to allow people to defend their livelihood.”

“I do not agree, should be ninety days and there still should be the ability for an individual to have a license review hearing in the event there are underlining circumstances.”

In the second question brokers were asked if they supported the proposed change to Bylaw [Sections 89.03\(3\), Sec 90.2\(3\), Sec 97.1](#) to **remove** the requirement for all taxi plate holders to drive a minimum number of hours per year, and **keep** the requirement for the vehicle attached to any taxi plate licence to be

driven a minimum of 250 days per year. Most brokers who responded were against the proposed change and stated the need of accountability for the plate owner to work in the industry.

Verbatim quotes:

"There has to be some accountability for the owner of the plate to work in the industry. This bylaw has never been enforced, for years ATPL owners have leased their taxis to other people and not been involved in the business. So this would be a no for me."

"I'm curious why you are wanting to do this. The minimum hours requirement was to ensure there was no sub-leasing in this whole process. Now taking away the hours, you're potentially raising concerns for drivers to not be active in the industry and now potentially have sub-leasing."

Brokers were asked about their comments regarding the third proposed change to plate holder obligations, Bylaw [Section 100 & 101](#), which is to **remove** the exception of the plate renewal fee. The intention is to clarify that the plate holder is responsible for this fee, and the driver should not be paying for a plate, only for use of the vehicle. Most brokers indicated that the fee a plate holder charges is for cost recovery, not subleasing and this proposed change will not solve the subleasing issue.

"This should not change unless the city is prepared not to charge any fee's for licensing as this is just a cost recovery for everyone and is not the solution to the previous subleasing issue which today is almost non existant since the inception of the 5000 unlicensed TNC allowed on the road."

"The issue of subleasing doesn't even exist today. Maybe they're getting their renewal fees paid – that to me isn't subleasing. It's no different than a restaurant recouping property tax fees, food costs etc. Whatever they have to charge to make a profit. This change isn't going to stop subleasing."

When asked if there were any other regulation changes they would propose to apply to all taxi plate holders to help streamline or clarify the Bylaw requirements, the brokers had a variety of responses, including reducing the size of the TDL badge for easier display in the taxi, suggesting that there should be more regulation and limits on the number of TNCs to make it a fairer system for taxis and replacing Livery Transport Services with the existing Business Licensing department.

Additional regulatory requirements

Brokers were asked about additional regulatory requirements in relation to being a taxi broker they would like to see changed to help streamline or clarify the Bylaw requirements, or improve driver or public safety.

The themes we heard included:

- inspections every six months for all livery vehicles
- fairness in industry by capping TNCs or deregulating taxis
- fees too high for taxis and limousine compared to TNCs
- all drivers and vehicle registration fees should be the same across sectors

Verbatim quotes:

"We would like to see fairness within the industry, on licensing, fee's, which includes TNC'S and also a cap on TNC's or deregulate the entire taxi industry, the industry will not survive in the long run competing against an open unregulated competitor."

"I had the opportunity to read through all of the six participant engagement surveys and in each survey I found there to be some very leading questions. I think that one of the key issues that has been left out of the engagement process is the vast discrepancy in cost charged by LTS to the different segments of the industry. LTS has always said that they need to do the bylaw review to understand what the fees are going to be, when in reality what should have happened is that they start with a goal to insure the fees are more in line for all industry participants."

"Make all livery vehicles maintain a 6 month inspection period. You are playing with public safety."

Summary of input – Limousine Broker and Plate Holders

Vehicle requirements

To help address the issue of unlicensed limousines operating in Calgary, The City is proposing to expand the definition of a limousine to include vehicles with a seating capacity greater than 15 passengers, (i.e. up to 24 person including the driver). Limousine and plate holders were asked to explain how this change will impact their business, if at all.

The responses from the limousine and plate holders were mixed. Some participants were against the proposed change of the definition and believed it is not a good time to make the change and it will not address the issue. Some didn't agree with this change if this includes vans and buses and others indicated that a party bus is not a limousine. Some participants supported the proposed change because business is slow, it makes it fairer for those who follow LTS guidelines and incur the costs, and some specifically supported this change for stretch limousine carrying more than 24 people.

Verbatim quotes:

"If this change is for only stretch limousines that carry more than 24 people, I am okay with stretch limousines falling under LTS. If you are trying to include vans and buses under LTS, I don't feel this is LTS mandate. Vans and Buses with a seating capacity over 15 passengers are regulated under Alberta's commercial vehicle inspection certificate. For companies to have to comply with two sets of vehicle inspections, I feel is overkill and costly and unnecessary."

"It would level the playing field because some limo operators are doing is buying larger capacity vehicles so they don't have to follow the rules and regulations of Calgary livery and they don't have to spend the money that I have to buy the decals. Drivers of larger vehicles don't need a chauffeur badge. Some companies are putting in drivers that don't have the proper classification. Drivers could have a criminal record – impacts safety of passengers. I would not limit it to 24, if it looks like a limo and acts like a limo, it's a limo no matter what capacity it is. All doing the same work I'm doing, just at a larger capacity."



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In addition, the limousine brokers and plate holders were also asked if the change will help address the issue of unlicensed limousines operating in Calgary and improve safety for customers and if not, what their suggestions to strengthen the Bylaw are. Most limousine and plate holder respondents believed that it will not help address the issue of unlicensed limousines operating in Calgary. Some limousine and plate holders expressed that the issue is not about safety and shared that the provincial license fee is significantly lower than The City's which could be the reason for unlicensed limousines and plate holders. They also suggested to review the Brokerage Licence System to strengthen the Bylaw.

Verbatim quotes:

"This will not help any issues of unlicensed limousines. It will only affect legally operating buses. Forcing all operators of buses to follow licensing conditions that are designed to target a specific activity of a small minority of those operators is inefficient and unfair to the operators and their customers. Most 24 passenger buses are not party buses (just as pre-arranged limousines are not operated in the same manner as demand service taxis and black cars)." *"Yes, it could. but the reason for the unlicensed limousine growth is the Brokerage license fee. Who wants to pay over \$1800.00 when they can get a \$50.00 provincial license. It is not about safety. The provincial license has the same safety requirements. and if they can pass through it is a very easy and fair price. To strength the bylaw you need to rid of or review the BROKERAGE LICENCE SYSTEM. Then you will see how many unlicensed limousines will enroll in your office."*

The City is looking at removing the limousine subcategory of "specialized" limousines from the bylaw and including them in a broadened definition of a "sedan" limousine instead. The limousine and plate holders were asked if they had any concerns with the change in working within the Bylaw and to explain why. Almost all the participants indicated that they did not have any concerns.

Further to the previous question, limousine and plate holders were asked would expanding the 'sedan' category to include "the vehicle must provide comfort to passengers and offer an unique or luxury experience to passengers" affect your business model. Almost all of the respondent said no, this will not affect their business model.

Payment and cameras

Current Bylaw provisions allow a limousine to accept payment by cash for a trip booked through an approved App if a camera is installed and approved by the Chief Livery Inspector. The City is proposing to remove this provision as the presence of a camera alone should not enable a different payment system than what is approved for the service. The limousine and plate holders were asked to share any concerns, if any, about this change and the majority responded that they had no concerns.

Digital submissions

The limousine brokerages and plate holders were asked: as a broker, would you like the flexibility to utilize online licensing options including submission of documents and if yes, what type of livery licensing should be provided online versus in person. Almost all of the limousine brokerages and plate holders responded, yes to the first question, and believed mechanicals should be provided online. Additionally, limousine brokers suggested mechanicals should go directly from the mechanic to LTS to prevent tampering.



Limousine and plate holders were asked what their ideas are on streamlining the document submission process and the majority suggested submitting documents online and some suggested to streamline the mechanical document submission process by having the mechanic submit the mechanical directly to LTS.

Verbatim quotes:

"The Mechanical submitted by the Mechanic would bypass the owner of the vehicle from tampering with the paperwork, possibly."

"This would save the owner time from having to go to the livery office, stand in line, wait for their turn, wait for the secretary to enter the info and stamp the pink and canary copy. There is no payment unless the mechanical was submitted late, then the owner would have to go in and pay, even this can be done online and paying online."

Driver requirements

When limousine brokers and plate holders were asked about proposed changes to provisions in Sections 85, 86 and 87 of the current Bylaw making similar requirements for drivers in all sectors, most indicated they had no concerns while some indicated regarding [Section 86 \(h.1\)](#) that limousine drivers should be able to charge the passenger \$250 for soiling the vehicle and added that with a high end luxury car the cost of damage can often exceed \$250.

Verbatim quotes:

Section 85:

"I approve 100% that all drivers should comply with these Bylaws"

Section 86:

"(h.1) With a high end luxury car the cost of damage can often exceed \$250. In the event of vomit on the seats, if the leather seats are perforated and heated or cooled it is not sufficient to clean the surface but the whole seat must be removed and disassembled, cleaned and re-installed. This takes time (out of service) and is expensive. Remove the limit."

Systemic racism

Through a multiple choice question, limousine brokerages and plate holders were asked if they heard from their drivers whether they have experienced racism as a driver in the livery industry. When responding to this question most limousine brokerages and plate holders indicated that they either rarely or never heard from customers experiencing racism while using livery services in Calgary.

Limousine brokerages and plate holders were asked for their suggestions on how the City could better prevent and address racism occurring in the industry, responses included:

- Through public awareness (social media, leaders speaking more about it in media)
- Education/training

Specifically, a suggestion for a logo that stands for 'racism is not acceptable' to be placed on the window or behind the passenger seat of a limousine was provided.

Verbatim quotes:

"I would like to see our leaders speaking about it in the media more often. Would like to see more of outdoor education like advertisement."

"Easiest way to do it would be public awareness through social media. Maybe come up with a logo that stands for 'racism is not acceptable' and have it in vehicles operated by brokers. Make it accessible for everybody when they pick up their badge or decals – have it at each cashier. It can be a sticker they put on the window right above the rates (in a taxi). Post the logo and have a red line through it – "racism is not tolerated" and say City of Calgary."

Additional regulatory requirements

Limousine brokerages and plate holders were asked about additional regulatory requirements, in relation to being a limousine broker or limousine plate holder, they would like to see to help streamline or clarify the Bylaw requirements, or improve driver or public safety. Although there were few responses, most suggested to streamline requirements to reduce fees. Other suggestions included changes to the identification of a limousine from the current sticker/decal, considering increasing the seating capacity of regulated limousines to more than 24 passengers, and suggesting that a smaller limousine company shouldn't be paying the same brokerage fees as a larger company.

Verbatim quotes:

"If the vehicle looks like a limo, acts like a limo, it should be regulated as a limo by the Livery, even if has a larger capacity than 24 passengers. I have seen limobuses that can accommodate 24 or more passengers that ARE operated as limousines. Regulations for these larger vehicles need to be put in place by the Livery for the safety of the public and create an even playing field for all limo companies operating in the City of Calgary and surrounding areas. ie. Airport and Casinos on Federal Land."

"... Fees – For little operators, I don't understand why I have to pay the same amount to be a broker as the big guys who have 200 cars. It's \$3500 now for a brokerage I think. Can't remember but it's a lot. In industry we've discussed it and it doesn't make sense. Should be based on number of cars. LTS has to pay more attention to larger companies because they have more cars. Should be prorated per vehicle."

"Reduce fees. add cameras, shorten the lifespan of the sedan or impose mileage restrictions"

Summary of input – TNC Representatives

Note, due to the nature of some responses to the TNC Representatives survey, it appears that TNC drivers may have responded to this survey rather than TNC company representatives, as intended. All responses are considered in this summary of input however some may not reflect the TNC representative perspective.

Vehicle markings/requirements

TNC representatives were asked about their concerns regarding implementing the Council-directed requirement in the new Bylaw for all TNC vehicles to have a visible company decal or beacon on the front windshield and a visible company decal on the rear windshield of TNC vehicles.

Although many respondents supported the new requirement and had no concerns, the most commonly expressed concerns from other respondents were:

- support current red/TNC sticker
- distracting/visibility concerns
- unnecessary/unwanted on private vehicle

One TNC representative indicated a concern that this requirement may encourage street hailing, but indicated that this requirement can be operationalized over a few months with an existing company decal design already used in other cities.

Verbatim quotes:

“Obstruction of view in front.”

“In my personal opinion tnc sign on the rear wind shield is significant enough with the commercial number plate to identify and verify. Adding on the front wind shield will not make any difference.”

“Don’t like the idea of being labeled by the public with the beacon on the window. Some people don’t like to be advertising that they are being driven in a Uber. The red sticker on the rear window should be enough.”

Vehicle requirements/inspections:

The City is proposing to make the vehicle inspection requirements more consistent across sectors. TNC reps were asked about their concerns with a proposed change to remove the option of the Private for Hire Vehicle being inspected by a garage approved by the Alberta Motor Vehicle Industry Council (AMVIC).

Most respondents did not indicate any concerns. Amongst those who did, there were limited responses relevant to the question. Several indicated concerns of availability and cost of limiting the garages allowed to provide inspections of TNC vehicles. One TNC rep who was against the change advocated for the adequacy and quality of AMVIC approved garages for inspecting ridesharing vehicles, and that ridesharing vehicles are operating on a different business model than other livery vehicles.

Verbatim quotes:

“Vehicle are already inspect through approved garages. Limiting to limited garages may be put pressure for the drivers.”

“Yes, everything changes costs us. We don’t need any cost at this difficult time of pandemic.”

“Large taxi operators often own or have very close ties to a single inspection facility. This could make sense for a broker who owns a large number of plates. However, it does not make sense for ridesharing drivers who live throughout the City and should have access to inspection facilities in their own neighbourhood.”

Payment and cameras

In the current Bylaw there is a provision allowing a person providing private for hire vehicle service through an approved App to accept payment by cash if a camera that meets the requirements set out in Section

39.1 has been installed in the Private for Hire Vehicle and approved by the Chief Livery Inspector. We are proposing to remove this provision as the presence of a camera should not enable a different payment system than what is approved for the TNC App.

TNC reps were asked about their concerns, if any, about this change.

The vast majority of respondents had no concerns about the change with some indicating they prefer electronic payment for security and that it conforms to company policy. A few indicated that cash tips should still be allowed by customers.

Verbatim quotes:

"It is good idea to have a camera for a safety of bothered rider and driver, but I don't want cash money being paid because online payment is more secure."

"I think TNC vehicles should have the option to have a camera and cash should not be accepted. I believe cash invites danger to the driver."

...However, the city should maintain flexibility to not penalize drivers who may accept cash gratuities above and beyond the trip fare that is received electronically."

"No concerns, it is better like that, payment through app."

Driver requirements

When TNC reps were asked about proposed changes to provisions in [Sections 85, 86 and 87](#) of the current Bylaw making similar requirements for drivers in all sectors, most indicated that they had no concerns/no objection however some had some specific concerns related to how TNCs operate.

When asked if TNC reps had any concerns with any of the proposed changes to [Section 85](#), most respondents did not indicate any concerns. Of the few who did indicate concerns, one TNC representative expressed concerns about driver requirement [Section 85\(e\)](#) applying to all drivers, "immediately after delivering a passenger, inspect the Livery Vehicle to determine whether or not the passenger has left any property and PROPOSE to ADD: and lost property should be returned to the passenger as per company or brokerage policy"; as they felt that drivers should not be held responsible for items lost by riders.

Several respondents shared concerns about changes to [Section 85 \(i\)](#) "upon discovering a defect on a Livery Vehicle he is operating which contravenes the Enhanced Livery Vehicle Inspection Standards (E.L.V.I.S), report it to the Brokerage or TNC to which the Livery Vehicle is affiliated"; particularly that reporting the defect to a TNC is not necessary as the driver should repair these defects. One respondent also indicated that [Section 85 \(i\)](#) "inspect the Livery Vehicle he will be operating before each shift and repair any defects which contravene E.L.V.I.S before operating the Livery Vehicle"; is already covered by other sections of the Bylaw Section 150.1 and notification obligations in Section 88.4(2) were mentioned).

Verbatim quotes:

"Drivers should not be held responsible for items lost by riders. Specifically if a driver does find an item it should be "reasonably made available" to the rider as opposed to "returned."

"Given that drivers are legally not to operate an unsafe vehicle, and ridesharing companies don't own the vehicle, it is not necessary for drivers to notify the TNC. In practice a driver who would deem the vehicle unsafe would go directly and get it fixed. If a driver was to be a bad actor and to not get it fixed, it is extremely unlikely that they would notify the TNC that the car is unsafe but that they will drive it in that condition regardless. As such, keeping the obligation on the driver to not operate an unsafe vehicle is sufficient."

"The driver should immediately repair any defects before carrying passengers. No need to report it."

"Section (j) is a bit ridiculous. If I have a bulb out on my Lic. Plate I am now being expected to Report this? WASTE of time and resources."

When asked if TNC reps had any concerns with any of the proposed changes to [Section 86](#), most indicated that they had no concerns/no objections while some believe that [Section h\(1\)](#) requirements of being able to charge a passenger a fee of up to \$250 for soiling the interior of the vehicle should also apply to TNC drivers, not just taxis. A few indicated concerns with [Section 86 \(i\)](#) in terms of having sufficient hours of time off for TNC drivers.

"86(i) may lose a problem with drivers overworking to the point they are unsafe."

"H.1 should also for TNC."

Most TNC Representatives had no concerns with any of the proposed changes to Section 87.

Systemic racism

TNC representatives were asked if they've heard from their drivers if they have experienced racism as a driver in the livery industry in Calgary. Over 40 per cent of respondents indicated that they have sometimes or often heard this from their drivers.

In response to whether TNC reps have heard from their customers if they have experienced racism while using livery/vehicle-for-hire services in Calgary, approximately 75 per cent of respondents indicated rarely or never.

The TNC reps survey responses were diverse when asked how The City could better prevent and address racism occurring in the industry. The most commonly mentioned ideas included:

- Public awareness
- Warning decal
- Install a video camera (in vehicles)

Other suggestions involved the TNC driver rating systems and ensuring no tolerance for racism.

Verbatim quotes:

"Public awareness initiatives to educate individuals on the City's position of acknowledging the existence of systemic racism. In addition to acknowledging its existence the City may also want to commit to and promote its position as an anti-racist municipality and speak to concrete steps or areas of focus it will lead or take on in achieving this objective."

"Apply a warning decal visible to riders. Install a video camera inside all TNC cars to record any racist incident."

"Racism is also reflected through the rating as well and no matter how excellent service is provided to customer, based on your background, it's racially lower rating. Appropriate change could be made the rating system in this regard."

"Strongly recommend for respect each others. It should no any tolerance for rasim."

Additional regulatory requirements

TNC reps were asked for their ideas on any other regulatory requirements in relation to being a TNC they would like to see changed to help streamline or clarify the Bylaw requirements, or improve driver or public safety. Again the responses were diverse on this topic, however the most common theme that emerged was about drivers wanting more pay and a few mentioned reducing livery fees. Based on these responses, it should be noted that it is likely some of them were provided by drivers, not from TNC company representatives.

One TNC representative response was very detailed in its suggestions, including topics such as:

- Allow for TNDLs to be facilitated electronically directly between the City and ridesharing companies
- Acceptance of documents timeframe
- Vehicle inspections document as a separate document (not included in TNDL)
- Reduce costs and fees (similar to recent taxi fee reduction)
- Fee structure, implement a per-trip fee to recover livery costs in place of per-driver/vehicle fees.

Verbatim quotes:

"...We are encouraged by staff's comments indicating efforts to reduce costs and fees for industry. We would strongly suggest that given the recent fee reductions for taxi similar accommodations should be provided to ridesharing as well..."

"Just the pay rate per hour should be more."

"Livery fee shouls be wave. Charges from drivers not more then 15% of the trip."

"The company should pay for drivers more. The driver is responsible for gas, maintenance, data and so many expenses to continue work and earn money, while the company pay nothing for customer. So the base fare should be increased and the TNC driver should make fair income without killing the car life by driving 300 to 400 km to make \$120 or less a day. I would like the Livery Transport authority to work on it. Regarding this, I don't mind if you share my concerns to the TNC company. Thank you."

"...We would ask that the City update the language in the bylaw so that the timeframe by which a document is to be received relates to when the ridesharing company receives it rather than when the City receives it. This will avoid edge cases where a driver for some reason uploads it at the last minute and it is then received by the City via the ridesharing company outside the tolerance date...."

Summary of input – Taxi Plate Holders

Clarifying and streamlining taxi plate holder obligations

As part of clarifying and streamlining our plate holder regulations for taxis, The City is considering a few changes to the Bylaw. The taxi plate holders were asked to describe any concerns or comments for each change in [Sections: 71.1\(3\), 89.03\(3\), 90.2\(3\), 97.1, 100 and 101](#). And to provide suggestions to improve the proposed change.

Regarding Bylaw [Section 71.1\(3\)](#), clarify the requirement that if a T.PL. or A.T.P.L. is not renewed within 30 days after expiry, the plate may be revoked without a Licence Review Hearing, most taxi plate holders did not support this change due to emergencies and being stuck overseas and some wanted to keep the current requirements.

Verbatim quotes:

"Totally disagree. There is lots of points like medical conditions, family emergency, stuck in other countries like covid 19, owners deceased, sometime very rear but cannot arrange funds in 30 day"

"Not agree with proposal, is very harsh and not reasonable also not fair for T.P.L or A.T.P.L. it should be kept current requirement"

Regarding Bylaw [Section 89.03\(3\)](#), [Sec 90.2\(3\)](#), [Sec 97.1](#) to **remove** requirement for all taxi plate holders to drive a minimum number of hours per year, and **keep** the requirement for the vehicle attached to any taxi plate licence to be driven a minimum of 250 days per year. Most taxi plate holders agreed and supported this change while some disagreed with this change and some indicated to remove both minimum hours and days.

Verbatim quotes:

"This proposed change is good! We should not force the owners of the plate to drive for their life. They should be rewarded for their hard work in the past and they should have the choice who drive their plate."

"Both should be removed. It is not fair as taxi brokers can still keep th6plates off as long they want but individual taxi owner can't."

Taxi plate holders were asked if they supported the proposed change to Bylaw [Section 100 & 101](#) to **remove** the exception of the renewal fee. Most taxi plate holders agreed with this proposed change.

Additional regulatory requirements

The taxi plate holders were asked if they had any other regulation changes they would like to propose to apply to all taxi plate holders to help streamline or clarify the Bylaw requirements, or improve driver or public safety.

Although a wide-range of responses were provided when taxi plate holders were asked this question, where it made it challenging to report any general themes to this question, the following are verbatim quotes to some of the responses:

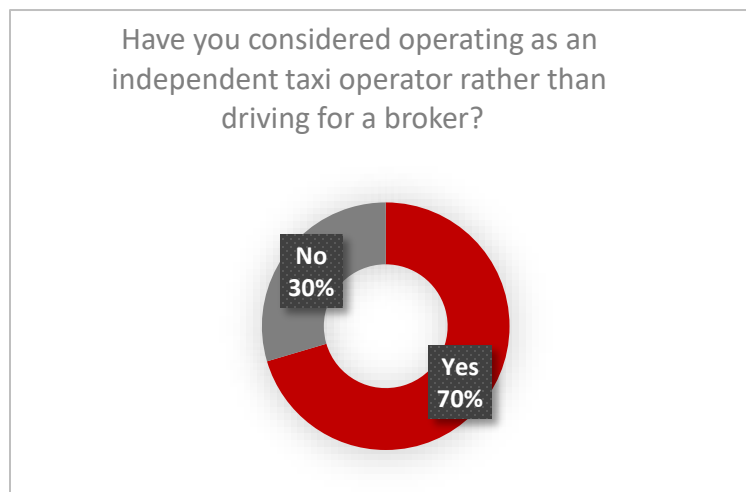
"All taxi plate holders should have the same rules and all taxi plates should have the same law! Make it easy for the plate owners or majority of them will abandon the plates. I think transferable and non transferable plate rules should go too.. these regulations are mostly unfair and old school !"

"Current taxi by laws should be in line to the other ride sharing companys in regards to their business model. City can propose a plan to it's taxi service similar to the ride sharing system to be in competition."

"Is it possible to lower renewal fees because uber is highly competitive to with our taxi business. This has highly affected us and our income."

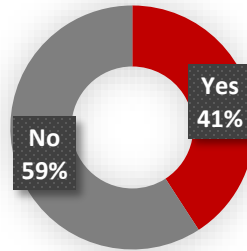
Independent taxi operator

Taxi plate holder participants were asked (yes/no) if they have considered operating as an independent taxi operator rather than driving for a broker. 70 per cent said "yes", they have considered it while 30 per cent said "no".



The plate holders were then asked if they had any concerns about becoming an independent operator and if yes, to specify those concerns. 59 per cent said "no," while 41 per cent said "yes."

Do you have any concerns about being an independent operator?



Of the plate holders who indicated they had concerns, their comments and concerns included:

- The need for a central dispatch
- Cost of business
- Cost of insurance
- Not enough business

Verbatim quotes:

"There should be a common dispatch system for all companies which should have a centralized dispatching controlled by city of calgary."

"Commercial insurance too expensive and how I get business"

"Already there is no business for Taxi even with a broker, will be challenging to operate independently"

When taxi plate holders were asked what regulation or licensing changes would make it more attractive for them to be an independent taxi operator, the themed responses were comparable to the concerns shared in the previous questions. The suggested changes from the plate holders include:

- Allow own individual insurance/simplify insurance regulations
- Central dispatch (City)
- Reduce fees
- Simplify regulation

Additionally, when responding to this question some plate holders expressed their concerns about taxi brokerages and the fees they charge.

Verbatim quotes:

"No need special colour code for taxi. Taxi drivers pay extra for colour coding. Just need decals on doors."

Taxi drivers should have they're own independent taxi and insurance and he should be allowed with any company can have there percentages according to taxi driver income same like as TNC"

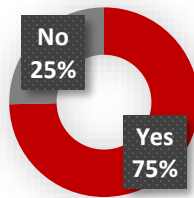
"Well, I think if Livery transport set up their own dispatch system, then it will be easier for becoming an indépendant taxi operator."

"Reducing the fees as per the current prevailing circumstances. Taxi driver will only make money if there are no or minimal overheads and an equal competition platform with other ride sharing companys."

Vehicle markings/requirements

Plate holders were asked if they like the idea of the option to place a light indicator in the front windshield to show when the taxi is in or out of service rather than the traditional top light on the roof of the taxi. 75 per cent of the plate holders who responded said yes they like the idea while 25 per cent said no.

Do you like the idea of the option to place a light indicator in the front windshield to show when the taxi is in or out of service rather than the traditional top light on the roof of the taxi?



The plate holders were asked to specify why if they answered, "no". Examples of responses are included in the quotes below.

Verbatim quotes:

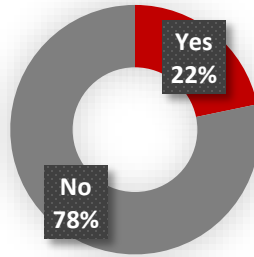
"A taxi must be distinguished from other vehicles.If you remove the top light we will loose even more business"

"Taxi has an image with the top light in consumers mind. Better focus on some real change for the industry rather than these fake changes. This move will eventually eliminate taxi industry ."

"Should be choice of drivers. I like top light because customer can see it from back as well and from far"

Taxi plate holders were also asked as a taxi plate holder, would you like an option to put the vehicle number (taxi plate #) in a different location than currently, while maintaining visibility? 78 per cent of the taxi plate holder participants responded "no", while 22 per cent said "yes".

As a taxi plate holder, would you like an option to put the vehicle number (taxi plate #) in a different location than currently, while maintaining visibility?



The majority of taxi plate holders who liked the option and responded “yes” indicated that the location of the vehicle number should/could be placed on the rear window/windshield.

APPENDIX A – Driver Comparison Table

Provisions from the current Livery Transport Bylaw that are proposed to be changed or applicable to all drivers are listed in the table below.

BYLAW SECTION AND PROVISION	CURRENT			PROPOSED			
	TDL	LDL	TNC	TDL	LDL	TNC	ALL DRIVERS
Section 85 Every Driver other than a Transportation Network Driver while operating a Livery Vehicle shall:							
(a) be neat and clean in person and dress;	√	√	X				√
(b) be professional and courteous;	√	√	X				√
(c) promptly attend to passenger pick ups;	√	√	X				√
(d) take proper care of all baggage and personal property given to him for conveyance, and deliver such property as directed;	√	√	X				√
(e) immediately after delivering a passenger, inspect the Livery Vehicle to determine whether or not the passenger has left any property PROPOSE to ADD: and lost property should be returned to the passenger as per company or brokerage policy;	√	√	X				√
(h) unless requested by the passenger to do otherwise, take the most economical route to a destination;	√	√	X				√
(i) inspect the Livery Vehicle he will be operating before each shift and repair any defects which contravene E.L.V.I.S before operating the Livery Vehicle;	√	√	X				√
(j) upon discovering a defect on a Livery Vehicle he is operating which contravenes E.L.V.I.S., report it to the Brokerage or TNC to which the Livery Vehicle is affiliated;	√	√	X				√

BYLAW SECTION AND PROVISION	CURRENT			PROPOSED			
	TDL	LDL	TNC	TDL	LDL	TNC	ALL DRIVERS
Section 86							
A Driver other than a Transportation Network Driver:							
(a) must accept all persons as passengers except when entitled to refuse such persons pursuant to this section;	√	√	X				√
(b) is entitled to refuse a passenger if such a person:	√	√	X				√
(i) is impaired by alcohol or drugs;							
(iii) requests that the Driver carry an animal in the Livery Vehicle other than a Service Animal;	√	√	X				√
(iv) requests that a Driver carry baggage in the Livery Vehicle which might be detrimental to the repair, cleanliness or sanitary conditions of the Livery Vehicle;	√	√	X				√
(v) requests the Driver to carry any passengers or baggage which the Livery Vehicle is incapable of carrying;	√	√	X				√
(vi) insists on smoking or persists in smoking in the Livery Vehicle; or	√	√	X				√
(vii) is disorderly or abusive to the Driver;	√	√	X				√
(c) is not required to accept a passenger if the Livery Vehicle is not in service;	√	√	X				√
(h.1) may charge a passenger a fee of up to \$250 for soiling the interior of the Taxi or Accessible Taxi with vomit or bodily fluids; PROPOSE to REMOVE “with vomit or bodily fluids” as soiling could be caused by multiple sources.	√	X	X	√			
(i) shall have eight consecutive hours off duty in any twenty-four hour period.	√	√	X	Propose to Remove			

BYLAW SECTION AND PROVISION	CURRENT			PROPOSED			
	TDL	LDL	TNC	TDL	LDL	TNC	ALL DRIVERS
Section 87 A Driver shall not:							
(c) when Operating a Taxi carry a number of passengers in excess of the number stipulated by the Motor Vehicle's Manufacturer in its specifications for that Motor Vehicle; PROPOSE to AMEND to "when Operating a Livery Vehicle carry a number of passengers in excess of the number stipulated by the Motor Vehicle's Manufacturer in its specifications for that Motor Vehicle	√	X	X				√
(d) when Operating an Accessible Taxi or Limousine carry a number of passengers in excess of the number stipulated by the Chief Livery Inspector and shown on the Livery Vehicle Registration Certificate;	√	√	X	Propose to Remove as this is covered by above provision			
(d.1) when Operating a Private For Hire Vehicle carry a number of passengers in excess of the number stipulated by the Motor Vehicle's Manufacturer in its specifications for that Motor Vehicle.	X	X	√	Propose to Remove as this is covered by above provision			

APPENDIX B – Plate Holder Obligations

Notes: “T.P.L.” stands for Taxi Plate Licence. “A.T.P.L.” stands for Accessible Taxi Plate Licence. Please consider these changes in a post-COVID-19 environment, where trips would return to normal frequency.

Bylaw Section(s)	Current Provision	Proposed Change
Sec 71.1 (3)	If a T.P.L. or A.T.P.L. expires and an application to renew is not made within thirty (30) days of expiry, then the T.P.L. or A.T.P.L. is deemed to have been abandoned and the right to renew is forfeited. A Licence Review Hearing must still be held to revoke the licence.	Clarify the requirement that if a T.PL. or A.T.P.L. is not renewed within 30 days after expiry, the plate may be revoked without a Licence Review Hearing.
Sec 89.03(3), Sec 90.2(3), Sec 97.1	TPL-2s & ATPL-2 holders: Taxi must be personally driven by plateholder for (i) minimum 981 hours per calendar year or (ii) prorated # of hours year the TPL-2 is acquired AND “An Active T.P.L. Holder and an Active A.T.P.L. Holder must ensure that the T.P.L. or A.T.P.L. he holds is joined to a Livery Vehicle which is in service in the City for a minimum of two hundred and fifty (250) days in the 12 month period preceding the date of renewing the T.P.L. or A.T.P.L.”	REMOVE requirement for all taxi plate holders to drive a minimum number of hours per year, and KEEP the requirement for the vehicle attached to any taxi plate licence to be driven a minimum of 250 days per year.
Sec 100 & 101	Except as specified in this Bylaw, no Person shall charge or pay any fees, levies or charges whatsoever for the use of only a T.P.L. or A.T.P.L. except for the fee for renewal of the T.P.L. or A.T.P.L. charged by Livery Transport Services pursuant to this Bylaw.	REMOVE the exception of the renewal fee – the plate holder is responsible for paying this plate renewal licence fee, not the driver.