

**EXECUTIVE TAXI**  
WESLEY M. HOLLIS, PROPRIETOR

999 Pennsylvania Avenue  
San Francisco, CA 94107

10-24-07

(415) 826-9110

Re.: New Rules & Regulations Booklet.

Dear Taxi Commissioner:

The new taxicab rules & regulations booklet needs to be a major restructuring from the old one. I have shown (Exhibit 'A'), what I believe would be the most logical ordering of topics. By using my format, most all of the existing redundancies (which are numerous in the existing booklet), would be eliminated. Obviously, I feel that the subject of taxicab permit leases and owner/operators are important enough to have their own separate categories.

I have included a preliminary list of who the owner/operators are (Exhibit 'B'). Categorically (by definition), all one and two-cab cab companies are owner/operators. In most all instances, the three permitholders in a three-cab cab company will all be owner/operators. It is uncertain at this time how many more owner/operators there are. I can't get honest, knowledgable answers from other color scheme holders. They are too paranoid to be straightforward with me. Only a taxi commission staff person will be able to get accurate, truthful information from the larger cab companies.

To reiterate (from earlier letters), the definition of an owner/operator is:

- A) A taxicab permitholder whose vehicle is titled 100% in his own name, and no other name.
- B) A taxicab permitholder who 100% manages his own cab, hires his own lease drivers, takes care of all of the vehicle maintainence himself, etc.
- C) A taxicab permitholder who only leases the use of a color scheme and a radio dispatch service.

I have included what the vehicle use and retirement rules need to be for owner/operators to receive fair and equal treatment to what the large fleet-type cab companies get. I have included specific examples that show how the numbers work out for owner/operated cab companies (Exhibit 'C'). The one-cab cab company is fact, not fiction. It's what's going to happen to me, unless the existing rule is changed.

I will follow up in approximately a month with a detailed breakdown of which rules belong under what topic heading in the new regulations format that I am proposing. Obviously, this is a very time consuming task; please bear with me. Once I have completed this, I would be happy to spend whatever time is necessary, either individually, or in group sessions, to explain why the rule changes I am proposing are necessary, if San Francisco residents are to receive the best taxicab service that our industry is capable of providing.

Sincerely,

cc.: Heidi Machen

*Wesley Hollis*

# EXHIBIT 'A'

## TAXICAB RULES & REGULATIONS

### Table of Contents

1. Authority
2. Definitions
3. Vehicles (including ramped)
4. Ramped Vehicles (things applicable only to ramped cabs)
5. Taxicab Driver Training Schools
6. Drivers (including permitholders)
7. Permitholders
8. Owner/ Operators
9. Color Scheme Permitholders
10. Taxicab Permit Leases
11. Radio Dispatch Permitholders
12. Penalties
13. Severability

# EXHIBIT 'B'

## OWNER/ OPERATORS

<u>Cab Company</u>	<u>No. of Permits</u>	<u>No. of O/O's</u>
A B C	1	1
Executive	1	1
Gold Star	1	1
Best	2	2
Comfort	1	1
Six 2 Six	2	2
Max	3	3
S.F. Taxi	6	6
S.F. Super	2	2
U S A	2	2
Central	1	1
Lucky	1	1

Note: The spare cab in any of the above cab companies would automatically be deemed an owner/operated vehicle, irrespective of the registered vehicle owner's name.

Cab companies that probably have a few owner/operators:

DeSoto, Luxor, Bay, American, Delta, Fog City, Big Dog,  
Worldwide, United, Regents.

Cab companies that could be up to 50% owner/operators:

B & W Checker, National.

Cab companies that absolutely do not have any owner/operators:

Arrow, Alliance, Crown, Metro, Royal, Veterans.

SAN FRANCISCO TAXICAB COLOR SCHEME PHONE LIST

Rev.: 11-1-07

COMPANY	ADDRESS	ZIP	Dispatch	MAIN	FAX	CONTACT	# of permits		COLORS
							taxi	ramp	
<b>V.H.F. Frequency Dispatch</b>							<b>Total: 906 (66%)</b>		
DeSoto	555 Selby	24	970-1300	970-1300	643-2083	Cindy Ward	103	13	light blue/ dark blue
Luxor	2230 Jerrold	24	282-4141	282-1224	282-1706	John Lazar	164	25	white/ R/ B
Yellow Town	1200 Mississippi	07	333-3333	282-3737	826-7918	Nate Dwiri Richard Wiener	458	14	yellow
A B C	999 Pennsylvania	07	401-8900	401-8722	401-8722	Rafael Machkovsky	57	1	cream/ orang
Executive						Berhane Assefa	1		yellow/ blue
Gold Star	98 Pennsylvania		401-8900	826-9110	826-9082	Wesley Hollis	1		white/ silve
Bay	1340 25th St.			206-1908	206-1110	Ayad Badrous Roger Cardenas	1 66		blue/ whit white/ gold, red

<b>U.H.F. Frequency Dispatch</b>							<b>Total: 470 (34%)</b>		
Arrow	2575 Marin	24	648-3181	970-1100	642-6807	Bill Skiff Tyler Speck	65		red/ cream
American	120 Willow	09	614-2000	614-2000	775-3321	Phillip Achilleos	15	1	black
Best	85 Industrial	24		642-6400	642-6500	Linus Oha		2	red/ purple
B & W Checker Comfort	999 Pennsylvania	07	285-3800	285-3710	285-3605	Alex Gologriga Gennady Epshteyn	44	9	ivory
Delta	1340 25th St.	07		641-1611	641-1711	Jilcha Sambu		1	yellow/ black
Alliance	2175 Market St.	14		920-9097	681-8737	Martin Smith	16		light blue
Fog City	979 Bryant	03		934-1757	863-0843	Evelyn Poquez	6		red/ green/ white
Six 2 Six	1640 Davidson	24		282-8749	863-1139	Greg Poon	13	1	lime green
				626-8294	891-0450	Saam Alae Aryan	2		blue/ white
Big Dog Max	2121-A Evans	24	920-0700	920-0709	920-9154	Nick Lewis Jim Holmes	23		red
S.F. Taxi				358-8455	Sai Chiang	3	gray/ white		
S.F. Super				920-0713	920-0717	Jack Trad	6		white
Metro	2121-E Evans			531-2468	920-9154	Jimmy Wong	2		purple/ white
Royal	2121-G Evans			648-8500	642-3799	Richard Hybels	33		red/ gold
USA		643-9500	643-9595	Nishan Sweis	44	3	gold/ red		
Crown	85 Industrial			648-3700	648-3701	Albert Nimri	2		white/ R/ B
Worldwide	2560 Marin			920-1900	920-1919	Mohammed Khan	7		green/ tan
				282-7101	282-7105	Keith Raskin	12		black/ aqua
National Veterans	2270 McKinnon	24	648-4444	648-4119	821-6861	Dan Hinds	63		yellow/ greer
United	20 Heron	03		552-8562	552-2580	Ted Tehrani	18		red/ green/ white
							36		dark blue/ orange
Regents Central	98 Pennsylvania	07	487-1004	487-1004	487-0597	Brute Anton	35	2	light blue/ yellow
Lucky						Wayne Huey	1		silver
Green						Jimmy Chow	1		black/ silver
						Mark Gruberg	4		green/ white

PENDING: K S J, Grasshopper

TOTALS: 1,302 74

## EXHIBIT 'C'

What the rule needs to be for vehicles to be used as taxicabs, and when those vehicles have to be retired:

1. Any car with less than 60,000 miles on it, and 5 model years (4 literal years) old or less can be used as a taxicab.
2. Once a car has been put into service as a taxicab, it must be retired from service once the odometer reaches 350,000 miles.
3. A fleet vehicle can be used for up to 5 years. An owner/operated vehicle can be used for up to 8 years.

### **DISCUSSION:**

This is the only way that one or two-cab cab companies will ever receive fair and equal use of their vehicles, to what the larger fleet-type cab companies get out of their vehicles. Retirement has to be based on the number of years a vehicle has been in service as a taxicab, not on the literal age of the vehicle. When a vehicle gets 60,000 or more miles on it a year, literal age is of no consequence. The only relevant concern is how conscientious the owner of that vehicle is as regards maintaining the vehicle properly. This rule works for everyone, and does no one an injustice. You have to trust the G.T.U. inspectors to be competent at their jobs in making certain that cabs that don't measure up get failed atn their annual inspection.

# TWO-CAB CAB CO. (NEW START-UP) - EXAMPLE

## ASSUMPTIONS :

1. The average annual mileage on each permit is 80,000.
2. They can only afford to buy 3 year old Crown Vics. as their first cars.
3. They can't afford to buy a spare until their 2nd year in business.
4. The spare that they purchase is also a 3 year old Crown Vic.

### CAB #1400: (2004 CROWN VIC.)

DATE	ODOMETER	ANNUAL MILES DRIVEN	REMARKS
9-1-07	40,000	80,000	
-08	120,000	65,000	
09	185,000	60,000	
10	245,000	55,000	
11*	300,000*	50,000	*CURRENT REGULATION RETIREMENT DATE
9-1-12	350,000		WHEN THIS VEHICLE SHOULD BE RETIRED

### CAB #1401: (2004 CROWN VIC.)

DATE	ODOMETER	ANNUAL MILES DRIVEN	REMARKS
9-1-07	40,000	80,000	
-08	120,000	65,000	
-09	185,000	60,000	
-10	245,000	55,000	
-11*	300,000*	50,000	*CURRENT REGULATION RETIREMENT DATE
-12	350,000		WHEN THIS VEHICLE SHOULD BE RETIRED

### SPARE CAB #2999: (2005 CROWN VIC.)

DATE	ODOMETER	ANNUAL MILES DRIVEN	REMARKS
9-1-08	40,000	30,000	
-09	70,000	40,000	
-10	110,000	50,000	
-11	160,000	60,000	
-12*	220,000*	30,000	*CURRENT REGULATION RETIREMENT DATE
-13	250,000	40,000	
-14	290,000	50,000	
9-1-15	340,000		WHEN THIS VEHICLE SHOULD BE RETIRED

# ONE-CAB CAB CO. (EXECUTIVE TAXI) - EXAMPLE

## CAB # 1022

DATE	ODOMETER	ANNUAL MILES DRIVEN	REMARKS
9-1-04	39,000		CAB FIRST PUT IN SERVICE
-05	100,000	61,000	
-06	155,000	55,000	
-07	195,000	40,000	
-08*	235,000*	40,000	* CURRENT REGULATION RETIREMENT DATE
-09	275,000	40,000	
-10	315,000	40,000	
9-1-11	345,000	40,000.	NEW CAB PUT IN SERVICE ON
9-1-12:	?	65,000	9-1-11 WILL GET DRIVEN MOST OF THE TIME, HENCE 65,000 MI.

## CAB # 2171

DATE	ODOMETER	ANNUAL MILES DRIVEN	REMARKS
4-1-05	43,000		CAB FIRST PUT IN SERVICE
9-1-05	58,000	15,000	
-06	90,000	32,000	
-07	140,000	50,000	
-08	185,000	45,000	
-09*	230,000*	45,000	* CURRENT REGULATION RETIREMENT DATE
-10	275,000	45,000	
-11	320,000	45,000	
-12	340,000	20,000	NEW SPARE PUT IN SERVICE ON 9-1-12

### TOTAL ANNUAL MILES DRIVEN (BOTH CARS):

	#1022	#2171	TOTAL MI.
9-1-04 TO 9-1-05	61,000	15,000	= 76,000 MI.
-05 TO -06	55,000	32,000	= 87,000
-06 TO -07	40,000	50,000	= 90,000
-07 TO -08	40,000	45,000	= 85,000
-08 TO -09	40,000	45,000	= 85,000
-09 TO -10	40,000	45,000	= 85,000
-10 TO -11	40,000	45,000	= 85,000
-11 TO -12	65,000	20,000	= 85,000

} ESTIMATE BASED ON PREVIOUS 7 YEARS AVE.

Note: As of 9-1-08, the engine in my cab #1022 will only have 75,000 miles on it. It cost me \$3,500. to put a new engine in it at the 160,000 mile point. It is absurd to force a car into retirement when the engine in it is still practically new, comparatively.