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 reinterate (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,

Wesley Hollis

cc.: Heidi Machen

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
- Il. Radio Dispatch Permitholders
- 12. Penalties
- 13. Severability

EXHIBIT B'

OWNER/ OPERATORS

Cab Company	No. of Permits	No. of 0/0's
ABC	1	J.
Executive	J.	* .
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
USA	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.

Rev.: 11-1-07

COMPANY ADDRESS ZIP Dispatch MAIN FAX CONTACT								· · · · · · · · · · · · · · · · · · ·	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	<u>, </u>
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PENDING: KSJ, 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.
- 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 #1	400:	(2004	CROWN	V(C.)
~ ~ ~ ~			ANNUAL	1

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		
			SHOULD BE RETIRED

				THE PROPERTY OF THE PARTY OF TH
CAB #1	401:	(2004	CROWN	VIC.)
		8	ALIALIA	

DATE	ODOMETER	ANNUAL MLES 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	DOOMETER	MILES DRIVEN	REMARKS
9-1-08	40,000	30,000	
-09	70,000	40,000	
-10	110,000	50,000	
	160,000	60,000	
- 12*	220,000*	30,000	* SURRENT REGULATION RETIREMENT DATE
-13	250,000	40,000	The state of the s
-14	Z 90,000	50,000	
9-1-15	340,000		WHEN THIS VEHICLE SHOULD BE RETIRED

CAB *	* 1022		
DATE	DOOMETER	ANNUAL MILES ORIVEN	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	CHOPENT
- 08*	235,000*	40,000	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:	3	65,000	9-1-11 WILL GET DRIVEN MOST
· · · · · · · · · · · · · · · · · · ·	• .		OF THE TIME, HENCE 65,000 MI
CAB	2171		
DATE	OPOMETER	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	CURRENT
-09*	7 70 000 %		
	230,000 *	45,000	REGULATION RETIREMENT DATE
-10	275,000	45,000	REGULATION RETIREMENT DATE
-10 -11			REGULATION RETIREMENT DATE
	275,000	45,000	REGULATION RETIREMENT DATE
~11	275,000 320,000	45,000 45,000	REGULATION RETIREMENT DATE NEW SPARE PUT IN SERVICE ON 9-1-12
~ [] - [2	275,000 320,000 340,000	45,000 45,000 20,000	REGULATION RETIREMENT DATE NEW SPARE PUT IN SERVICE ON 9-1-12
~ [] - [2	275,000 320,000	45,000 45,000 20,000	REGULATION RETIREMENT DATE NEW SPARE PUT IN SERVICE ON 9-1-12 OTH CARS):
~ [] - [2	275,000 320,000 340,000 NNUAL MILE	45,000 45,000 20,000 S DRIVEN (B #1022 #2	REGULATION RETIREMENT DATE NEW SPARE PUT IN SERVICE ON 9-1-12 OTH CARS): TOTAL MI.
-11 -12 TOTAL A	275,000 320,000 340,000 NNUAL MILE	45,000 45,000 20,000 S DRIVEN (B	REGULATION RETIREMENT DATE NEW SPARE PUT IN SERVICE ON 9-1-12 OTH CARS): TOTAL MI. 20 = 76,000 MI.

- *0*7 40,000 + 50,000 90,000 -07 TO -08 40,000 + 45,000 = 85,000 - 08 TO 09 40,000 + 45,000 = ESTIMATE 85,000 -09 70 10 40,000 + 45,000 = 85,000 BASED ON -10 PREVIOUS TO 11 40,000 + 45,000 = 85,000 12 TO 65,000 + 20,000 7 YEARS AVE. 85,000

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 absurbd to force a car into retirement when the engine in it is still practically new, comparitively.