SUBMISSION

We have reviewed the Administrative Report entitled **"Transition of the Regulation of Vehicles for Hire from the Province of Manitoba to the City of Winnipeg"**.

We believe that the report is a **positive** beginning to over-hauling the regulation of the taxi cab industry in Manitoba. We urge the Committee and ultimately the entire council to accept the recommendations of this report with some additional items.

The positive changes that we see from the report include:

- The increase in the taxi licence supply and the formula that will allow more licences to be issued as the City's population grows.

- The requirement that dispatchers now also must be licenced and that there will be imposed reporting requirements on dispatchers;

- The dissolution of the current taxi cab board and the establishment of an appeal board with a specific protocol for the appointment of members.

- The focus on a competitive market and a level playing field for all those involved in the industry and

- The ending of the existing monopoly.

There are some areas however where we feel the report needs to go further. Specifically in the area of:

- Labour law protection for drivers;

- Transferability of licences and

- Independent dispatching system.

I would like to address these issues briefly:

Fair labour practices

In terms of labour practices vis-à-vis the taxicab companies and their drivers, we think that it would be helpful to first outline what the life a typical taxicab driver is like on a day-today basis. Doing so will highlight the need to proper labour practices to be established as part of any regulation of the industry.

Many owners of taxicab licenses "hire" drivers to operate their cabs. Generally a driver is required to:

- pay "rent" to the owner of between $90.00 to $100 per shift regardless of the amount of fares generated during any shift and;
- pay this "rent" for 7 days a week which equates to approximately $700-$630.00 per week. This must be paid even if the driver would only like to drive for 5 days a week.

The result of this fee arrangement is that a driver is forced to work a 12 hour shift for 7 days to be able to even come close to be able cover the rent payment and make some income for himself. Depending on the time of year (i.e. summer) when fares are down, a driver after paying the "rent" may make little if anything.

A driver therefore pays a significant fee to work 7 days a week every week of the year to earn at times less than minimum wage.
He/she has no rights or protection. If he/she complains, the owner will simply rent his taxicab to someone else.

The Manitoba Labour Board has not been an effective tool to address driver's concerns. The drivers are not viewed as being "employees". At best they are employed by the

individual owners. It is a gray area leaving the drivers vulnerable and without any real recourse.

Many drivers are immigrants to Canada. Drivers are hardworking men and women who are working to provide for them and their families. Daily they put themselves on the frontlines where they often face abuse from the public or physical harm. Any future regulation of the industry must include protection of the drivers.

Transferability of all licences

All taxi cab licences should be transferable. Under the existing report these is a provision which allows only current taxi licences will be transferable and then only for a further 20 years.

An individual invests financially in obtaining the license, obtaining a vehicle, establishing a clientele etc. and then cannot sell or transfer the business to anyone else to recover the investment should they wish to do so. He should be allowed to do so. There is no reason why- if the person who is going to assume the licence meets all other necessary requirements- the licence should not be transferred to him if he purchases the business.

Independent Dispatch Service

Regulations should be brought in to either establish a central independent dispatch service owned separate and apart from any one or two taxi cab companies with a calls dispatched on an "first available" system regardless of the company involved.

Similarly any driver should be able to take any call. There should be no quotas for example on the number of taxis that can attend at high volume areas such as airports, hotels etc.

Drivers want to again ensure that there is a "level playing field" for all in the industry. For far too long this has not been the case. As we stated, the report is a positive first step in this direction but more can be done particularly in these 3 areas.