

Dear Kingston Area Taxi Commission,

The Alma Mater Society of Queen's University (AMS), on behalf of the 17,700 students we represent, is writing you today to express our concerns about the ridesharing By-law that you are presently considering. We recognize the need to regulate Transportation Network Companies (TNCs) and we support enacting sensible regulations that follow established best practices. **However, we are firmly opposed to the proposed By-law No. 4 to regulate commercial ridesharing in its present form.** The AMS is calling on the KATC to create a fair and governable By-law that does not discriminate against a particular means of transportation that both students and residents have come to depend on. We will detail our rationale for opposing the content of your By-law below.

The Kingston Area Taxi Commission's (KATC) proposed By-law undermines the institutional, legislative, and regulatory quality that Kingstonians and Canadians have come to expect. The proposed By-law marks a profound divergence from comparative best practices used across jurisdictions in Ontario, Canada, and the rest of the world. The AMS strongly opposes By-law No. 4's attempt to stifle the operational model of Uber and other commercial ridesharing companies by imposing unfair restrictions and conditions on their continued operation in Kingston. Many of these conditions have no empirical justification and diverge from the best practices established elsewhere.

Accordingly, if the KATC wishes to pass regulations on commercial ridesharing services, it has a duty to treat all of the services it regulates fairly. By-law No. 4, in its present form, overtly discriminates against one regulated body (in this case, TNCs), while protecting the interests of other members of the transportation industry. In calling for regulatory fairness, the AMS is prepared to support a fair By-law that thoughtfully balances the needs of student and other community consumers with the interests of transportation service providers.

Regulatory fairness requires that legislators critically examine the fundamental differences between TNCs and traditional taxi cabs. Requiring TNCs to meet the same requirements as taxi companies in areas like a requirement for physical office space in Kingston will render certain commercial ridesharing models completely incompatible with the new regulatory framework. Therefore, if TNCs are to be regulated in the exact same way as taxi cabs, then TNCs will be inherently disadvantaged in comparison to other market players.

Lastly, by supporting a fair TNC By-law, the AMS will be representing student opinion. In a recent Transit & Transportation Survey, a majority of respondents indicated that they oppose By-laws that discriminate against TNCs and 62% of student respondents indicated that they use commercial ridesharing services. Furthermore, the AMS last year conducted a 450-signatory

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petition to mobilize student support for regulatory fairness. It is imperative that Kingston and area has a TNC framework that allows Uber to continue the provision of its service, as it provides a transportation option that students have recognized as financially accessible and convenient for their lifestyles.

In illustrating the desire for students to retain access to commercial ridesharing services, the AMS continues to recognize the need for regulation. The AMS will support a By-law that ensures and bolsters the safety of its student consumers. There are certain safety elements in the current proposed By-law that ought to be commended and ultimately legislated. The AMS is prepared to work with the KATC and offer its support of a By-law that reflects the safety concerns of students, while also representing their interest in maintaining a regulatory framework that does not disrupt TNCs' operations altogether.

In closing, the AMS is calling for a regulatory framework that fosters market fairness. In doing so, the AMS directly opposes the KATC's proposed By-law No. 4 in its present form. The AMS is calling on the KATC to redraft its By-law to ensure that Kingston consumers are able to interact with a market that is governed by principles of fairness, institutional quality, and is consistent with best practices.

We hope that this letter prompts a reconsideration of By-law No. 4 to adhere to best practices in other jurisdictions.

Sincerely,

The Alma Mater Society of Queen's University