

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**  
**DIVISION OF PUBLIC UTILITIES AND CARRIERS**

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**IN THE MATTER OF THE PROPOSED  
RULES AND REGULATIONS GOVERNING  
THE TRANSPORTATION OF PASSENGERS  
VIA PUBLIC MOTOR VEHICLES**

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**Docket: 13-MC-121**

**MOTION TO RECONSIDER AND STAY THE DIVISION’S ORDER  
ESTABLISHING PROPOSED RULES REGARDING PUBLIC MOTOR VEHICLES**

Pursuant to the Rhode Island Division of Public Utilities and Carriers’ (“Division”) Rule 31(d), Uber Technologies, Inc. (“Uber”) hereby files this Motion to Reconsider and Stay enforcement of the Division’s November 24, 2014 Report and Order (“11/24/14 Order”) issued in Docket 13-MC-121 that would implement a \$40.00 minimum allowable charge (“MAC”) rule for Public Motor Vehicles (“PMVs”).

As set forth in Uber’s previous filings in Docket 13-MC-121, a \$40 MAC is arbitrary and capricious, contrary to the legislative intent of Rhode Island General Laws §39-14.1-6, beyond the scope of the Division’s authority, contrary to state law, contrary to fundamental utility regulation principles that seek to encourage maximum customer benefits through deregulation in markets that exhibit competitive characteristics, and amounts to an illegal restraint on lawful trade in violation of both Rhode Island and Federal law.

Furthermore, since the hearing and briefing in the proceeding were completed, the General Assembly enacted H-8298 and S-3146, which created a Study Commission to make a comprehensive study and analysis of the status of the Public Motor Vehicle Act, including a

review of “the impact of innovative technologies including online enabled applications or smart phones to connect passengers with drivers” together with a review of “all statutes, rules or regulations pertaining to the [Public Motor Vehicle] Act.” This comprehensive mandate to review “all statutes, rules or regulations” necessarily includes a review of whether minimum charges are harmful to the economy and the public welfare in the market for public motor vehicles for hire. Thus, the legislature is currently examining the propriety of the MAC provision in R.I. Gen. Laws 39-14.1-6 that the 11/24/14 Order purports to implement. The Study Commission is required to report its findings and recommendations to the Governor and General Assembly no later than March 1, 2015.

In light of this important development, the Division should allow the Study Commission to do its work and allow interested parties to focus their efforts on working with the Study Commission rather than litigating the Division’s factually unsupported and legally defective 11/24/14 Order and any enforcement efforts by the Division. Accordingly, the Division should reconsider its Order and stay the implementation of the \$40 MAC. There is nothing compelling the Division to act within a certain prescribed time frame to implement an outdated MAC provision. To the contrary, the Division should defer to the Legislature’s pending review of this law and refrain from implementing or enforcing a MAC until the Study Commission process is completed.

## **ARGUMENT**

### **I. The Legislature’s Recent Actions Require Reconsideration of the Division Order**

Reconsideration is proper where “there is new evidence that could not have reasonably been presented during the proceedings or prior to the Commission’s decision, or that the facts

and circumstances have changed so significantly as to warrant a revisiting of the issues in dispute.” *See In Re Review of the Decision of the Arbitrator in Global NAPs Inc’s Petition for Arbitration Pursuant to Section 2529(b) of the Telecommunications Act of 1996*, Docket 3437 (Decided April 1, 2003).

As described further below, the facts and circumstances have changed so significantly since the conclusion of the public hearing and briefing that reconsideration of the 11/24/14 Order is warranted. On April 30, 2014, the Division conducted a rulemaking hearing as to the appropriateness of the \$40.00 MAC in Docket 13-MC-121. Post-hearing briefs were filed on May 30, 2014 and this Docket closed the same day. On June 20, 2014, the Rhode Island General Assembly passed a bill to create a Study Commission to examine the issues surrounding these transportation issues. Specifically, the Study Commission will study and analyze all aspects of the Public Motor Vehicle Act, including whether minimum charges, the subject of the 11/24/14 Order, are harmful to the economy and the public welfare in the market for public motor vehicles for hire. The establishment of a Study Commission by the General Assembly is significant change in circumstances and, therefore, warrants reconsideration by the Division. Rushing to implement a MAC right after the Legislature has clearly signaled its intent to review this provision is both inappropriate and fails to give the proper deference and respect to the Legislature and its clear mandate that this issue should be subject to further investigation.

## **II. Documents Disclosed Pursuant to an APRA Request After the Hearings Justifies Reconsideration and Stay of the Division’s Order**

After the hearings concluded, the Division disclosed documents pursuant to an Access to Public Records Act (“APRA”) request that reveal inappropriate coordinated efforts between Division staff and the limousine and taxi industry they are charged with regulating to stifle

competition and to seek legislation from the General Assembly with the stated goal of keeping Uber and other ridesharing technology platforms out of Rhode Island. These newly disclosed documents confirm that the \$40.00 MAC is an illegal restraint of trade, unconstitutional and a violation of Rhode Island law. Furthermore, the Division staff's collusion with the taxi industry to target new and innovate transportation alternatives facilitated by Uber, Lyft and Sidecar and to prevent their entry into Rhode Island is a violation of the Division's mission to ensure that transportation options in Rhode Island are "adequate, economical, safe, and efficient" as required by R.I. Gen. Laws §39-14.1-2. The Division's efforts to ensure that certain businesses remain profitable while ensuring that other businesses fail are not only contrary to this mission, they also violate numerous state and Federal laws.

Moreover, the documents provided pursuant to the APRA Request make clear that the legislation directing the Division to establish a MAC was crafted by the New England Livery Association's ("NELA") and that the purpose was to make it "difficult" for Uber to enter the Rhode Island market. *See* Email from Rick Szilagyi to Terrence Mercer dated July 26, 2012 attached as **Exhibit 1** ("NELA Email"). Furthermore, the documents show that NELA was largely responsible for the arriving at a \$40 MAC. These documents contradict the Division's previous statements that the minimum charge legislation and the \$40 minimum rule was not enacted specifically with Uber in mind.

For example, Mr. Mercer stated in an interview during the 2014 legislative session that the new \$40 minimum charge rules "are not aimed at any particular business endeavor" and that "Uber wasn't even on their radar" at the time of implementation. *See* Article reproduced in the Rhode Island State House New Summary attached as **Exhibit 2**. However, the documents

produced in response to the APRA request contradict this statement and suggest the Division was fully aware of NELA's request for a minimum charge in the \$40 range in order to prevent Uber from entering Rhode Island.<sup>1</sup> Further, the documents show that the Division supported NELA in its legislative pursuit, and ultimately regulatory effort, designed to force innovate transportation alternatives facilitated by Uber, Lyft and Sidecar out from Rhode Island.

Pursuant to R.I. Gen. Law § 39-1-23.1, the Administrator of the Public Utilities Commission "has been charged under this title with the responsibility of promoting adequate, economical and efficient service by motor carriers and reasonable charges therefore without unjust discriminations, undue preferences, or advantages, or unfair or destructive competitive practices." Based on this newly discovered evidence, it is clear that the Division has failed to abide by these standards. This collusion between the Division and NELA to pass legislation mandating a minimum charge and establish \$40 minimum as an economic barrier to prevent innovate transportation alternatives facilitated by Uber, Lyft and Sidecar from operating in Rhode Island further support's Uber's position that the \$40 MAC is arbitrary and capricious, unconstitutional, constitutes tortious conduct, is contrary to legislative intent of Rhode Island General Laws §39-14.1-6, beyond the scope of the Division's authority, an abuse of discretion, contrary to state law, an illegal restraint of trade, is clearly erroneous, constitutes unlawful interference with Uber's contractual relations with PMV drivers and is contrary to fundamental utility regulation principles that seek to encourage maximum customer benefits through

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<sup>1</sup> See Email from Mr. Mercer to the owner of Go Orange, LLC, a taxi company operating in Newport, dated February 9, 2012 attached as **Exhibit 3**. ("That's why the New Eng. Livery Assoc. is on board with this approach. In fact, it was their suggestion.")

deregulation in markets that exhibit competitive characteristics in violation of the standard of review set forth in §42-35-15(g)(1) through §42-35-15(g)(6).<sup>2</sup>

In response to documents produced in an APRA request after the hearings, it is also clear that the Division has “aligned” itself with the taxi industry in order to eliminate options to passengers that seek alternative transportation arrangements through Uber’s App. Again, it is inappropriate for the Division to be jointly advocating with the very industry it is supposed to be regulating. For example, the documents produced in response to the APRA request confirm that on or about April 4, 2014, the Division requested a private meeting with all the taxi company owners in Rhode Island in order to agree upon a strategy to oppose proposed legislation favorable to Uber in the 2014 legislative session. This joint strategy meeting is summarized in the transcript of a hearing conducted by the Division on April 8, 2014 regarding alleged violations committed by MAT, Inc., which operates a transportation company in Rhode Island. During the hearing, Michael A. Tartaglione, MAT, Inc.’s company representative, testified that:

*This past Friday, we were at a meeting here, called by Mr. Mercer upon all taxicab owners in the State of Rhode Island. He was looking to align himself with these taxicabs so that he could currently go against Uber, Lyft and Sidecar because of an application. Number one, that they're looking to -- they'll ask the legislatures to exclude them from any new rules and regulations pertaining to the PMV Division, and Mr. Mercer was also looking to align himself with the taxicab companies that do not operate PMVs in conjunction with their taxis to enforce the upcoming hearing of April 30th to put a minimum price on PMVs. (Emphasis Added).*

Testimony of Michael A. Tartaglione in Docket 14-MC-44, Page 67 attached as **Exhibit 4**.

Mr. Tartaglione went on to testify that:

He [Mr. Mercer] was also looking to align himself to have all of the taxicab drivers be at the State House tomorrow, okay, so that Uber, Lyft and Sidecar do not get granted their

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<sup>2</sup> See Uber’s previous filings with the Division for a full discussion of these issues.

request of being exempt because they have a -- but at that point in time, again, *Mr. Mercer may have had a bias in his mind because he does want to align himself with the taxicab owners against the PMV taxicab owners, and he did want to align himself with the PMV taxicab owners and just taxicab owners against Uber.* (Emphasis Added).

Tartaglione Division Tr. at 68.<sup>3</sup>

Finally, in the 11/24/14 Order, the Division suggested that the Go Orange, LLC expert report produced by John S. Reed is an independent verification of the validity of the \$40 minimum charge. However, the documents produced pursuant to the APRA request reveal that on Sunday, April 27, 2014, Mr. Daniel Moriarty, the President of Go Orange, LLC sent Mr. Mercer a copy of what was intended to be Mr. Reed's final expert report, seeking the Division's "input" before hearings. *See* Email dated April 27, 2014 and Final Report attached as **Exhibit 5** ("Attached is John's *final* report. It can be changed up to Tuesday if you have any input.") (Emphasis Added)).

The very fact that this report was sent to the Division for input before being presented to the Hearing Officer as an "independent" report is further evidence of the collusion that exists between the Division and companies it is suppose to be regulating that seek to keep innovate transportation alternatives facilitated by Uber, Lyft and Sidecar out of Rhode Island. Moreover, this joint coordination between a so-called independent expert and the Motor Carrier Division taints and discredits the findings report. For these further reasons, the Division should discredit its reliance on this report in this rulemaking analysis.

The documents disclosed pursuant to the APRA request also reveal a potential conflict of

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<sup>3</sup> This coordination with the Division to defeat new customer options offered by companies like Uber is confirmed in documents received in response to an APRA request. *See* Email dated May 27, 2014 attached as **Exhibit 6** (where Mr. Mercer informs John Oligner, the President and CEO of All Occasion Transportation, that he called Rick Szilagyi at NELA to inform him of a Senate hearing regarding a bill supported by Uber.)

interest involving the Division's expert witness, Mr. Matthew Daus, whose testimony is heavily relied upon in the Division's Order. Specifically, the recently disclosed documents reveal that Mr. Daus refused to accept the \$10,000 payment from the Division for the many hours he spent drafting a report and testifying at the hearing.<sup>4</sup> Together with Mr. Daus' well-documented bias against Uber and all other "ride-sharing apps," this disclosure raises significant concerns that could undermine the reliability of both Mr. Daus' testimony and the Division's Order. As Rhode Island Supreme Court has held, "[t]he extent to which a court may base its conclusions upon expert evidence will depend upon its confidence in the experience and skill of the witnesses *and also in their impartiality and candor.*" *Public Utilities Commission v. East Providence Water Co.*, 136 A. 447, 449 (R.I. 1927). Mr. Daus' bias and prejudice against Uber and all other "ride-sharing apps" is uncontroverted. Mr. Daus has stated: "They [Uber] disgust me, the way that they act. How could they say this stuff seriously? If they say it again, we're going to be getting lawyers."<sup>5</sup> This new evidence indicating that Mr. Daus was personally interested in the outcome of the proceeding and not just functioning as an impartial expert witness merits further investigation as well as reconsideration and a stay of the Division's order until an investigation into the matter is complete.

### **III. Uber is Entitled to a Stay of the Imposition of a \$40.00 minimum.**

In order to grant a stay, the moving party must show that it (1) has a reasonable likelihood of success on the merits, (2) will suffer irreparable harm without the requested injunctive relief, (3) the balance of the equities, including the possible hardships to each party

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<sup>4</sup> See Exhibit 7.

<sup>5</sup> See Exhibit 8.

and to the public interest, tip in its favor, and (4) has shown that the issuance of a preliminary injunction will preserve the status quo. *See In re: Joint Petition for Purchase and Sale of Assets by the Narragansett Electric Company and they Southern Union Company* (D-06-13) citing, Iggy's Doughboys, Inc. v. Giroux, 729 A.2d 701, 705 (R.I. 1999) (outlining the standard for a Motion to Stay); See also In Re: Review of Amended Power Purchase Agreement Between Narragansett Electric Company d/b/a National Grid and Deepwater Wind Block Island, LLC. Docket 4185 (Order issued Aug. 16, 2010).

As the Administrator points out in his comments, the \$40.00 MAC rule has been stayed for several months “in order to revisit the propriety of the dollar amount.” Now that recent legislation was enacted to conduct a thorough review of the Public Motor Vehicle statute in the context of new transportation options available in Rhode Island and to analyze whether minimum charges are harmful to the economy and the public welfare in the market for public motor vehicles for hire, the Division should extend its stay of enforcement.

**A. Uber has a Reasonable Likelihood of Success on the Merits**

A stay of the implementation of the Rules is warranted because Uber has a reasonable likelihood of success on the merits that the Superior Court will likely find that the \$40.00 MAC was illegally imposed for the reasons previously argued in Uber’s post-hearing briefs and further supported by the recently disclosed documents indicating an illegal restraint of trade with the purpose of keeping alternative transportation options out of Rhode Island. The Court will also likely determine that the Division is in violation of R.I. Gen. Law § 39-1-23.1, which mandates that the Division promote “adequate, economical and efficient service by motor carriers and reasonable charges therefore *without unjust discriminations, undue preferences, or advantages,*

*or unfair or destructive competitive practices.”* (Emphasis Added). Moreover, the Superior Court will likely find that the \$40 MAC is arbitrary and capricious, contrary to legislative intent of Rhode Island General Laws §39-14.1-6, beyond the scope of the Division’s authority, unconstitutional, contrary to state law, is an illegal restraint on lawful trade and contrary to fundamental utility regulation principles that seek to encourage maximum customer benefits through de-regulation in markets that exhibit competitive characteristics.<sup>6</sup>

**B. Uber Will Suffer Irreparable Harm.**

It is clear that Uber will suffer irreparable harm if a stay is not granted. The imposition of a \$40 MAC will prevent PMV partners that have contracted with Uber from utilizing Uber’s App to provide PMV-licensed services in Rhode Island. It is undisputed that the Division’s purpose in establishing a \$40 MAC was to protect the taxi industry from competition from PMVs. If the Division chooses to implement and enforce the \$40 MAC, the Division would be intentionally and improperly interfering with Uber’s goodwill with its customers, current and future contractual and business relationships with its PMV partners. If an MAC is imposed and enforced, Uber and its PMV partners will be forced to suffer the loss of business opportunities and operations in Rhode Island. The Division is well aware that a number of drivers who have partnered with Uber have applied for and been granted their PMV Certificate to operate in Rhode Island. These Uber Partners would be affected by the Division’s Order implementing a \$40 MAC. As a result, Uber will incur significant and irreparable harm as a direct result of the Division’s improper actions and this Division imposed rule would amount to an intentional interference of contractual relations.

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<sup>6</sup> See Uber’s Reply Comments filed with the Division on May 30, 2014.

**C. The Balance of the Equities Favor Reconsideration and a Stay of the 11/24/14 Order.**

When considering the balance of equities, including the public interest, the equities weigh in favor of reconsideration and stay of the 11/24/14 Order because the public benefits secured by not interfering with the development of innovative transportation alternatives. It is clear that implementation of a \$40.00 MAC will have a significant negative impact on these innovative transportation alternatives by preventing them from freely operating in Rhode Island. Moreover, while the Division purports to comply with state law, it is clear that the \$40 MAC is inconsistent with the legislative intent and contrary to both current state law and the legislature's intent to reconsider the minimum charge provision. Since the Division's review of the MAC has been pending for several months, there will be no immediate harm to other parties by continuing the stay implementation of the MAC for a few more months to allow the legislature's Study Commission to comprehensively address the issue. Again, the public interest is served by a complete and thorough review before legislative Study Commission. As a result, the equities favor a reconsideration and stay of the 11/24/14 Order and the public that seeks to utilize innovative transportation alternatives in Rhode Island.

**D. The Issuance of a Stay Will Preserve the Status Quo.**

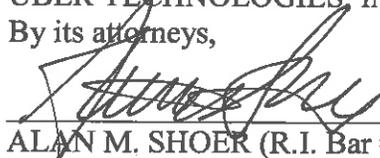
The stay is needed in order to preserve the status quo. The MAC authorized by legislation more than two years ago has never been implemented. A stay would preserve this status quo while the implementation of the \$40 MAC would severely impact PMV drivers and the development of innovative transportation alternatives in Rhode Island. Moreover, the law does not require the Division to implement the rules by a certain date, and the public has much to gain allowing the legislative Study Commission to complete its review and recommendations without

a highly controversial \$40.00 MAC rule being enforced and having the Division engage in this review. During this period, all other existing Rules governing Public Motor Vehicles will remain in effect, so the status quo is maintained while the Division both advocates as it deems necessary and awaits the results of the legislative Study Commission and recommendations.

**CONCLUSION**

For the reasons described above, the Division should reconsider and stay implementation of the \$40 MAC and should defer to the Study Commission to allow it time to examine the issues in a thorough and complete manner as intended by the law passed by the General Assembly after the conclusion of the administrative hearings in this matter.

Respectfully submitted,  
UBER TECHNOLOGIES, INC.  
By its attorneys,



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Date: December 4, 2014

**EXHIBIT 1**

From: <rick@lexian.com>  
To: "Terrence Mercer" <tmerc@ripuc.state.ri.us>  
Date: 7/27/2012 9:40 AM  
Subject: Re: NELA's input on PMV rule-making

Hi Terry... Checking with others... Back to you soon- Rick  
Sent on the Sprint® Now Network from my BlackBerry®

—Original Message—

From: "terry mercer" <tmerc@ripuc.state.ri.us>  
Date: Fri, 27 Jul 2012 09:19:38  
To: Rick Szilagyi <rick@lexian.com>  
Subject: Re: NELA's input on PMV rule-making

Hi Rick

How does next Thursday, any time, sound? I could do it another day, but I'm kinda playing it by ear as to whether I'll take a couple of vacation days Mon-Wed. I could alter my plans if needed, though. Let me know.

Terrence Mercer  
Associate Administrator  
Division of Public Utilities and Carriers  
89 Jefferson Boulevard  
Warwick, RI 02888  
(401) 780-2450 >>> "Rick Szilagyi" <rick@lexian.com> 7/26/2012 9:32 AM  
>>>

Good morning, Terry. Attached is a letter outlining our thoughts relative to a price floor and vehicle classification. Another realization we had, was that Uber Car, a new org that is trying to establish itself as a separate category between cabs and livery, and avoiding regulation, may have a difficult time getting into a market with a price floor as we recommend. They are currently in Boston pushing \$25 rides.  
<http://www.myfoxboston.com/story/19042713/uber-car-rental>

I will be out of the office for the rest of the day, and will call you from the road. We would like to set a time to discuss our thoughts with you, and based on that discussion, new ideas may come forth.

Thanks again,

Rick Szilagyi  
New England Livery Association  
P: 866.736.6352  
C: 603.988.3260  
F: 603.868.7859  
rick@lexian.com  
www.nelivery.org

From: terry mercer [mailto:t Mercer@ripuc.state.ri.us]  
Sent: Wednesday, July 25, 2012 12:30 PM  
To: Rick Szilagyi  
Subject: Re: Update from the NELA

Hi Rick:

Got your voice mail, too. No problem. Give me a call tomorrow to discuss.

Terry

Terrence Mercer  
Associate Administrator  
Division of Public Utilities and Carriers  
89 Jefferson Boulevard  
Warwick, RI 02888  
(401) 780-2150 >>> "Rick Szilagyi" <rick@lexian.com> 7/25/2012 11:54 AM  
>>>

Hi Terry... just left a vmail at your office and thought I'd send an email as well...

We are finalizing a letter to you, with recommendations relative to a price floor, as well as vehicle classification. We plan to have that to you tomorrow morning. Afterwards, we would also like to set a meeting with you to discuss in person.

Thanks, looking forward to our next conversation.

Rick Szilagyi  
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**EXHIBIT 2**

# Rhode Island State House

## NEWS SUMMARY

Produced for the Office of the Governor



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[Text within brackets is my text]; [james.alvarez@governor.ri.gov](mailto:james.alvarez@governor.ri.gov) for questions and comments about content

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bulky to send. Canned foods and bulk items, and items larger than 16 ounces, are not wanted.

Donations are needed for the postage it will cost to send the items overseas, and volunteers are also needed to organize and pack Nov. 23-24.

This year, the Rhode Island National Guard has 350 people who will spend the holidays away from home.

"For Rhode Island's great men and women serving abroad, and families sacrificing here at home, holidays can be an especially difficult time," Roberts said. "It should be our mission to support those who are serving us."

For more information about Operation Holiday Cheer, visit: [www.lt.gov.ri.gov/ohc/](http://www.lt.gov.ri.gov/ohc/)

### **Federal data hub goes down again, blocking health insurance enrollments in RI [Oct. 30]**

By Felice Freyer

A computer crash at the federal level is once again disrupting enrollments in health insurance at HealthSource RI, Rhode Island's health benefits exchange.

The federal data hub, needed to verify identities and eligibility for tax credits, "is experiencing an outage," according to a press release Tuesday from Connecticut's exchange, Access Health CT. HealthSource RI confirmed in a tweet Wednesday morning that the data hub is not working, preventing people in all states from proceeding with their applications.

"Rhode Islanders may anonymously browse plans to explore options or speak with Contact Center staff at 1-855-840-4774," the agency tweeted.

Although the computer systems are working well in Connecticut and Rhode Island (among the 14 states running their own exchanges), enrollment depends on connecting with the federal data hub. The data hub was also down for about 24 hours starting early Sunday.

### **NYC top cop Kelly shouted down at Brown University [Oct. 30]**

New York City Police Commissioner Ray Kelly was shouted down by protesters at Brown University, forcing administrators at the Ivy League school to call off his lecture on "Proactive Policing in America's Biggest City."

More than 100 students and social justice activists turned out Tuesday to protest the NYPD's stop-and-frisk policy and its surveillance of Muslims. Many of them began shouting and chanting inside the lecture hall as the event began.

Brown officials asked protesters to allow Kelly to speak and reserve their comments until a question-and-answer session. When the shouting continued, the hall was cleared.

Students opposed to Kelly's visit first petitioned the university to cancel the lecture, said Jenny Li, a Brown student who helped organize the protest.

When the university did not cancel the event, "we decided to cancel it for them," Li said. She called the protest "a powerful demonstration of free speech."

Brown University President Christina Paxson said the protest "deprived the campus and the Providence community of an opportunity to hear and discuss important social issues."

"The conduct of disruptive members of the audience is indefensible and an affront both to civil democratic society and to the university's core values of dialogue and the free exchange of views," Paxson said in a statement.

Paxson said in a letter to the university community she will "convey my deepest regret" to Kelly and convene a campus forum "to discuss our values and expectations as a community."

A federal judge recently ruled the NYPD's stop-and-frisk policy violated the civil rights of minorities. The city is appealing the decision.

### **RI officials launch annual gift drive for troops [Oct. 30]**

State officials have launched their annual holiday gift drive for troops serving overseas.

Lt. Gov. Elizabeth Roberts again organized the effort, called Operation Holiday Cheer, which puts together around 350 care packages for troops during the holiday season.

She was joined on Wednesday by Maj. Gen. Kevin McBride, adjutant general of the Rhode Island National Guard, to launch this year's drive. The guard's Family Assistance Center, the U.S. Postal Service and the Rhode Island chapter of the American Red Cross also help to organize the program.

Roberts said the effort allows people to let service members know "they are in our thoughts and prayers" and "express our deep appreciation for their service."

The program relies on donations of cash and other goods from people and businesses. Volunteers collect items, then pack and ship them in November.

### **Uber: New state-imposed charge will drive us out of RI [Oct. 30]**

By Kim Kalunian



The new car service Uber says they'll be forced to pull out of Providence if a new charge is placed on their services next month.

According to a new regulation drafted by the Rhode Island Division of Public Utilities and Motor Carriers (RIPUC), a \$40 minimum charge will be placed on all trips made by public motor vehicles that aren't taxis. The \$40 minimum would be charged for all trips regardless of time or distance.

The charge is set to take effect Nov. 11.

"It would make our business untenable in Providence and the state of Rhode Island," Meghan Verena Joyce, the general manager of Uber Boston and Providence, told WPRO Wednesday. Uber officially launched in Providence just last month.

The legislation for the law that mandated RIPUC implement the new charge was drafted and passed in 2012. Rep. Teresa Tanzi (D-Narragansett) sponsored the bill, but wasn't immediately available for comment.

According to an order filed by RIPUC on Oct. 15, Terrence Mercer, RIPUC's Associate Administrator for the Motor Carriers, said the minimum charge would "eliminate the rogue, gray-area sedan services that are really acting like taxicabs and, truth be told, stealing the work of taxicabs."

He went on to say that the fee would act as a way to distinguish between taxi cabs and cars used for services like Uber.

"It allows [public motor vehicles] to provide the premium service envisioned without leaving them the ability to steal taxi work," he said.

When reached by phone, Mercer said the new rule wasn't an attack poised to Uber from the state.

"These are not aimed at any particular business endeavor," said Mercer of the new minimum charge. "These are probably two years in the making."

Mercer explained that in 2002 the General Assembly created a special category for specialty "black car" services that were considered to be a step above traditional taxis. Because these "public motor vehicles," or PMVs, weren't as heavily regulated as taxis, they could get away with charging less for similar services.

Now Mercer said the PMV industry is "decimating" traditional taxicabs. Ten years ago, he said, there were 230 registered cabs. Now there are fewer than 200; there are roughly 100 registered PMVs.

Mercer said the goal of the new charge is to eliminate some of the PMV operators (the ones that are operating as taxis but loosely regulated like PMVs) but said Uber wasn't even on their radar. He said it's about leveling the playing field.

"If you were a taxi cab company and you were looking at someone who is taking your fares...what would you do?" he asked. "Become a PMV."

The problem with that is mass deregulation, something he likens to rogue pharmacists taking to the streets to oxycontin—they're still selling drugs, just without the oversight.

But over at Uber, Joyce said the move is aimed at protecting special interests.

"We worry that this puts special interests ahead of consumers," she said. "There's no reason going across town should cost \$40."

Mercer disputes that, calling their claims a "fallacy."

"It's designed to protect both industries so that the services they provide are maintained," he said. "It's really as simple as that."

While Mercer calls black car services like the one Uber provides "premium," Joyce said Uber's goal is to provide the best value to consumers. The California start up now offers their service in 50 cities around the world.

Their base rate for a trip is \$12 in Providence; much like a taxi, fare depends on time and distance.

Mercer said he doesn't see how the \$40 minimum will harm Uber, which he calls a "broker" since they are not PMVs themselves. Uber is a mobile app that connects drivers with riders.

"It's just they don't like that there is a minimum price floor," he said, "They already have their own self-imposed minimum."

Joyce said it's about more than just Uber and the money; it's about the principle of the issue.

"It's more than a \$40," she said. "It's really about the kind of state that Rhode Island wants to be."

Rhode Island is not the first state to give Uber pushback. The company has also encountered problems in places like Washington, D.C. and Dallas, Texas.

On Wednesday, Joyce and the Uber Providence team sent out a plea for signatures for a petition that aimed to halt the implementation of the \$40 charge. As of 3 p.m. Wednesday, the petition had nearly 1,300 signatures.

"Rhode Islanders deserve access to affordable transportation," Joyce said. "All we're asking is for Governor Chafee and elected officials to take a hard look at what this would do."

Mercer said he hadn't seen the petition before speaking with WPRO, but didn't believe it could do much to stop the \$40 charge from going into effect next month.



**EXHIBIT 3**

**Thomas Kogut - Re: House Bills**

---

**From:** terry mercer  
**To:** Dan Moriarty  
**Date:** 2/9/2012 9:40 AM  
**Subject:** Re: House Bills

---

Dan:

We are in full support of both bills and would appreciate any input "true" taxicab owners would offer in support as well. The "price floor" bill has the full support of the New England Livery Association and was introduced in the Senate last year by Sen. Doyle. It's my understanding he will reintroduce it on the Senate side very soon.

The overriding intent would be to keep PMVs from acting like taxicabs and essentially stealing such work from taxi companies. The continued loss of such work, as you well know, is devastating to "true" taxis and, potentially, will reduce the number of viable taxi operations to service the general public and, especially, the low income riders. PMVs always were envisioned to be something different from taxicabs, essentially a "sedan service" catering to a different client than taxicab clients (the original statute was passed to keep taxi owners from pulling off their roof light and meter and offering unregulated taxi business; that's still what's going on, as you know).

Without passage of this bill, the Division does not have any type of rate authority and would have to resort, instead, to a more onerous set of rules defining "pre-arranged" as, say, three hours in advance (and requiring tedious solicitation record keeping/receipts ...). Most PMVs (the legit ones and the grey-area guys) oppose that avenue. That's why the New Eng. Livery Assoc. is on board with this approach. In fact, it was their suggestion.

As for you touching base with Teresa and Russ, that would be VERY HELPFUL. It's always best to have them have a thorough understanding of the intent and why it's important.

As for the "police powers" bill, the Division has always had such powers for Chapter 12 carriers (property carriers), but not for passenger carriers. This would allow us to address rogue, unlicensed carriers (like the problem we had with Jim Borden) without having to enlist the local police departments. We intend to explain to the General Assembly members who may raise questions that we've had this authority for property carriers for 80-plus years and have never been accused of overstepping or misusing our authority.

If you have any questions about these bills that I haven't answered, just let me know. The same goes for anyone you reach out to. I'd be happy to explain the importance -- from our standpoint, anyway -- to them.

>>> "Dan Moriarty" <dan@moriartysllc.com> 2/9/2012 8:53 AM >>>  
Terry:

Two bills were introduced in the House (see attachments). One would require a \$35.00 minimum charge by public motor vehicles (and I assume record keeping) and the second gives Division investigators police powers.

Do you support these Bills? If you do let me know, I will get a hold of Teresa, Russ, and Lou and make sure they understand why they are so important. I'll also go to the committee meetings.

Dan.

**EXHIBIT 4**

**In The Matter Of:**  
*Rhode Island Division of Public Utilities & Carriers Hearing*

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*MAT, Inc. 14-MC-44*  
*April 8, 2014*

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PROVIDENCE, R.I.

*Mini-U-Script with Word Index*

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES AND CARRIERS

\*\*\*\*\*  
IN RE:

14-MC-44 - MAT, INC. - FITNESS HEARING  
MAT, INC., 417 SMITHFIELD AVENUE, PROVIDENCE,  
RHODE ISLAND 02904, AND CORPORATE LIMOUSINE  
SERVICES, LLC, AFFILIATED COMPANIES  
\*\*\*\*\*

ORIGINAL

DATE: April 8, 2014  
TIME: 10:00 A.M.  
PLACE: Rhode Island  
Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, Rhode Island 02888

HEARD BEFORE HEARING OFFICER:  
WILLIAM LUEKER, ESQUIRE

APPEARANCES:

FOR THE ADVOCACY SECTION:  
CHRISTY HETHERINGTON, ESQUIRE

FOR MAT, INC.:  
MICHAEL F. HORAN, ESQUIRE

ALSO PRESENT: David Brooks,  
Chief Field Investigator  
Alice Dutilly, Complainant  
Michael A. Tartaglione

1           A. This past Friday, we were at a meeting here,  
2           called by Mr. Mercer upon all taxicab owners in  
3           the State of Rhode Island. He was looking to  
4           align himself with these taxicabs so that he could  
5           currently go against Uber, Lyft and Sidecar  
6           because of an application. Number one, that  
7           they're looking to -- they'll ask the legislatures  
8           to exclude them from any new rules and regulations  
9           pertaining to the PMV Division, and Mr. Mercer was  
10          also looking to align himself with the taxicab  
11          companies that do not operate PMVs in conjunction  
12          with their taxis to enforce the upcoming hearing  
13          of April 30th to put a minimum price on PMVs.

14                 At this hearing, there were a number of  
15          taxicab owners that do not have PMVs that ask what  
16          can be done right now. I mean, these people are  
17          operating this now. They're taking our work and,  
18          you know, Mr. Mercer was in a hurry, but he says,  
19          "There's nothing we can do right now because  
20          there's no law in place. It is a gray area."

21         Q. So, you're speaking to the over-urging issue of  
22          whether or not there should be a price floor to  
23          distinguish public motor vehicle from the taxi  
24          industry; correct?

25         A. Well, that was one of the things we were

1 talking about. He was also looking to align  
2 himself to have all of the taxicab drivers be at  
3 the State House tomorrow, okay, so that Uber, Lyft  
4 and Sidecar do not get granted their request of  
5 being exempt because they have a -- but at that  
6 point in time, again, Mr. Mercer may have had a  
7 bias in his mind because he does want to align  
8 himself with the taxicab owners against the PMV  
9 taxicab owners, and he did want to align himself  
10 with the PMV taxicab owners and just taxicab  
11 owners against Uber.

12 Q. Are you telling me just simply to highlight the  
13 fact that there is a problem out there right now?  
14 Is that your point?

15 A. Exactly.

16 Q. I was actually at the same meeting. When you say  
17 Mr. Mercer hoped to align himself, isn't it more  
18 accurate to say he was informing the industry to  
19 see if they wanted to take action? I don't think  
20 there were any positions taken per se; correct?

21 A. No. No positions, but Mr. Mercer stands  
22 solely, okay, as far as when he represents himself  
23 on the minimum pricing on the PMVs. We've had a  
24 number of oppositions to that and, again, the  
25 people that are in line to make the most money

1           Likewise, I find the company  
2 representative, Mr. Tartaglione, also very  
3 forthright. He's had a good history here at the  
4 division. A long, long standing in the industry,  
5 and I think he's taken excellent remedial measures  
6 in terms of apologizing, sending a check, working  
7 with staff, and all of that I do acknowledge and I  
8 appreciate.

9           I would like to note that,  
10 notwithstanding, the efforts to give restitution  
11 were made in a check of \$35 to Ms. Dutilly, and I  
12 have to apologize, it was not myself that told her  
13 not to cash it. I would note that the check of  
14 December 24th has now expired, if you will. So,  
15 for all intents and purposes, I would ask that the  
16 Hearing Officer find that there was a violation.

17           That the \$35 restitution that was intended  
18 to be paid be again remitted to Ms. Dutilly, and I  
19 would ask that this be treated as a singular  
20 violation for which the law allows a \$1,000 fine.  
21 I would ask for that imposition, but I would ask  
22 that 500 of that be suspended for a six-month  
23 probationary period to ensure that his remedial  
24 measures are actually taking effect.

25           HEARING OFFICER LUEKER: Before Mr. Horan

## C-E-R-T-I-F-I-C-A-T-I-O-N

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PROVIDENCE, SC.

I, SALLY BRASSARD, do hereby certify that  
the foregoing is a true, accurate, and complete  
transcript of my notes taken at the above-entitled  
proceeding.

IN WITNESS WHEREOF, I have hereunto set my  
hand this 20th day of April, 2014.

*Sally Brassard*  
*Notary Public*



---

SALLY BRASSARD, CSR/RPR  
NOTARY PUBLIC  
MY COMMISSION EXPIRES: 1/16/17

**EXHIBIT 5**

**From:** Terry Mercer  
**To:** Dan Moriarty  
**Date:** 4/28/2014 9:01 AM  
**Subject:** Re: Final Report

OK. Thanks.

Terrence Mercer  
Associate Administrator  
Divison of Public Utilities and Carriers  
89 Jefferson Boulevard  
Warwick, RI 02888  
(401) 780-2150

>>> "Dan Moriarty" <[dpm@moriartysilc.com](mailto:dpm@moriartysilc.com)> 4/27/2014 10:53 PM >>>  
Hi Terry:

Attached is John's final report. It can be changed up to Tuesday if you have any input.

Thanks,

Dan.

Stone Gables Engineering Services, LLC  
P.O. Box 486  
Newport, RI 02840  
Phone: 401.662.9676 Fax: 508.229.0678  
Email: [stonegablesllc@aol.com](mailto:stonegablesllc@aol.com)  
Web: [www.sge-llc.com](http://www.sge-llc.com)

---

**OPERATIONS RESEARCH  
TO DETERMINE  
MINIMUM ALLOWABLE CHARGE**

**PREPARED FOR GO ORANGE, LLC**

**DRAFT**

**Prepared by  
John S. Reed, P.E., M.B.A**

**Submitted to:**

**Rhode Island Division of Public Utilities & Carriers**

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DRAFT

## 1.0 GENERAL

### 1.1 SCOPE

The focus of the research is to determine the appropriate Minimum Allowable Charge that a Public Motor Vehicle certificate holder or driver may charge to a passenger for intrastate transportation services.

The research is premised on the view that, by design, the Rhode Island General Assembly has established certain laws and regulations that are intended to clearly differentiate Taxicabs / Limited Public Motor Vehicles (LPMVs) service from Public Motor Vehicles (PMVs).

Furthermore, the research is premised on the assumption that the State of Rhode Island, through appropriate regulation, promotes the operation of taxi and other transportation companies by granting taxi and PMV licenses to a limited number of taxi operators so that the financial investment in such an operation is not put at risk due to an overabundance of competition within a limited jurisdictional market. The control mechanism for ensuring solvency of a taxicab operation is maintained through an application and hearing process administered by the RIPUC. It is only upon proving need and necessity exists within a certain territory that additional certificates are issued. Through this process, Orange Cab proved need and necessity and was in turn granted a total of 20 Certificates from Division of Public Utilities and Carriers (DPUC). It is now upon significant investment in the operation that Orange Cab now maintains a fleet that equals the number of certificates and is fulfilling the obligation to service the need and necessity for public transportation to constituents and visitors to Newport and the surrounding territories.

In order to continue to provide the current level of service to the ridership it serves, Orange Cab has hired Stone Gables Engineering Services, LLC to perform operation research and opine on an appropriate Minimum Allowable Charge that should be in effect to ensure entities other than those established as a taxicab company are not allowed to compete in a more heavily regulated public transportation market may continue to operate profitably.

### 1.2 DEFINITIONS

The name "Orange Cab" refers to Go Orange, LLC. Go Orange, LLC, the requestor of this report, is a member of a group of several limited liability companies collectively doing business under the name of Orange Cab.

The term "PUC", shall refer to the State of Rhode Island and Providence Plantations Division of Public Utilities and Carriers.

The following terms and their definitions have been derived from the State of Rhode Island and Public Plantations Division of Public Utilities and Carriers "Rules and Regulations Governing the Transportation of Passengers via Public Motor Vehicles", with an effective date of November 11,

2013:

**Cab:** Means taxicab or limited public motor vehicle.

**Certificate:** Means a certificate of public convenience and necessity or a certificate of operating authority issued to a common carrier.

**Limited Public Motor Vehicle:** Means and includes every motor vehicle for hire, other than a jitney as defined in R.I.G.L. Section 39-14-1, or a taxicab as defined in Section 39-14-1, or a public motor vehicle as defined by Section 39-14-1-1, equipped with a taximeter, used for transporting members of the general public for compensation only from a designated location on private property to such points as may be directed by a passenger.

**Minimum Allowable Charge:** Means the absolute minimum charge a Public Motor Vehicle certificate holder or driver may require of a paying passenger for intrastate transportation services.

**Public Motor Vehicle:** Means and includes every motor vehicle for hire, other than a jitney, as defined in R.I.G.L. 39-13-1, or a taxicab or limited public motor vehicle, as defined in R.I.G.L. 39-14-1, transporting members of the general public for compensation in unmarked vehicles for a predetermined or prearranged charge to such points as may be directed by the passenger. Transportation services provided by charter services as defined in R.I.G.L. Chapter 39-14.1, or by funeral home in association with funeral services, and by ambulance companies, shall be exempt from these rules. Public motor vehicles must carry "Public" registration plates issued by the Division of Motor Vehicles (or the equivalent plate for out-of-state registrations).

**Taxicab:** Means and includes every motor vehicle for hire, other than a jitney as defined in R.I.G.L. Section 39-13-1, limited public motor vehicle as defined by 39-14-1 and public motor vehicle as defined by Section 39-14.1-1, equipped with a taximeter, used for transporting members of the general public for compensation to any place within this state as may be directed by a passenger on a call-and-demand basis.

### 1.3 REFERENCES

References are made throughout this Report to the following reports and are hereby summarized:

**Operations Research to Determine Optimum Fleet Size.** Prepared by Stone Gables Engineering Services, LLC and submitted as part of testimony for Application under Docket # 09-MC-22.

**Operations Research to Determine Optimum Fleet Size.** Prepared by Stone Gables Engineering Services, LLC and submitted as part of testimony for Application under Docket # 12-MC-53.

### 1.4 ASSUMPTIONS

The sample data sets that represent a month of completed trips during a winter month and a summer month were provided by Orange Cab and serve as the basis for the analysis and conclusions.

In the opinion of the owner of Orange Cab, the sampling provided is an actual reflection of a typical vehicle operated by Orange Cab. There was no special consideration in selecting the sample vehicles or the trips completed by them for this research.

### 1.5 USE

This Report was prepared for Go Orange, LLC. The information contained herein shall not be used, disseminated or reproduced for any other purpose other than matters related to the PUC hearing of Docket No. 12 MC 53 without first obtaining written permission of Go Orange, LLC or Stone Gables Engineering Services, LLC.

### 2.0 INTRODUCTION

**DRAFT**

The PUC has an obligation to ensure the public need and necessity is met. In striving to do that, the PUC must also ensure that regulated businesses under their jurisdiction are also able to remain profitable in the regulated markets. For this report, the focus is on ascertaining an appropriate Minimum Allowable Charge that should be put into effect so that neither the profitability of Orange Cab nor the current level of service that the company provides to its ridership is compromised by other entities being allowed to unfairly compete in this same market space for the same ridership under less regulation.

In order to arrive at an appropriate Minimum Allowable Charge, Stone Gables Engineering Services, LLC, through empirical means, was retained to analyze the trip data of a representative sample set of trip data derived from company records and, based on analysis of that data, arrive at the Minimum Allowable Charge that should be enforced so that profitability may be maintained.

The author holds a B.S. degree in Civil Engineering from West Point, a M.S. degree in Civil Engineering from Worcester Polytechnic Institute and a M.B.A. degree from the University of Pforzheim, Germany. The focus of his studies was Operations Research and Finance. He has published a thesis focused on inventory optimization using statistics and operations research modeling. He has implemented operations research and statistic modeling for inventory and order optimization while employed by Zeiss Corporation in Germany and American Power Conversion (APC) in Rhode Island. He is a registered Professional Engineer in the State of Rhode Island and owner of Stone Gables Engineering Services, LLC based in Newport, RI.

### 3.0 DATA ANALYSIS

The individual trip data and interviews with the company owner serve as the basis of the analysis to determine the appropriate Minimum Allowable Charge that a PMV operator would be required to charge for transporting members of the public that would ensure continued profitability and ability to provide adequate level of service to the company's ridership.

### 3.3.1 Individual Trip Data

The following exhibit is representative of the raw data that was analyzed in order to arrive at the appropriate Minimum Allowable on the following page summarizes the call data recorded by Go Orange, LLC. Data is representative of each trip completed within the sample period of one month in a peak season and one off-peak month.

**Data Sampling for Minimum Allowable Charge Operations Research (2014)**

Taxi # 12

Data Start Date: July 1, 2013  
Data End Date: July 31, 2013

Trip #	Base Charge	Additional Charge	Additional Charge	Minimum Charge	Total Cost of Trip
1	\$2.00	\$0.00		\$0.75	\$2.75
2	\$2.00	\$1.50		\$0.75	\$3.75
3	\$2.00	\$1.00		\$0.75	\$3.75
4	\$2.00	\$1.00		\$0.75	\$3.75
5	\$2.00	\$1.25		\$0.75	\$4.00
6	\$2.00	\$1.75		\$0.75	\$4.00
7	\$2.00	\$1.25		\$0.75	\$4.00
8	\$2.00	\$1.25		\$0.75	\$4.00
9	\$2.00	\$1.25		\$0.75	\$4.00
10	\$2.00	\$1.25		\$0.75	\$4.00
11	\$2.00	\$1.25		\$0.75	\$4.00
12	\$2.00	\$1.60		\$0.75	\$4.25
13	\$2.00	\$1.50		\$0.75	\$4.25
14	\$2.00	\$1.50		\$0.75	\$4.25
15	\$2.00	\$1.75		\$0.75	\$4.50
16	\$2.00	\$1.75		\$0.75	\$4.50
17	\$2.00	\$1.75		\$0.75	\$4.50
18	\$2.00	\$2.00		\$0.75	\$4.75
19	\$2.00	\$2.00		\$0.75	\$4.75
20	\$2.00	\$2.00		\$0.75	\$4.75
21	\$2.00	\$2.00		\$0.75	\$4.75
22	\$2.00	\$2.00		\$0.75	\$4.75
23	\$2.00	\$2.25		\$0.75	\$5.00
24	\$2.00	\$2.25		\$0.75	\$5.00
25	\$2.00	\$2.25		\$0.75	\$5.00
26	\$2.00	\$2.50		\$0.75	\$5.25
27	\$2.00	\$2.50		\$0.75	\$5.25
28	\$2.00	\$2.50		\$0.75	\$5.25
29	\$2.00	\$2.50		\$0.75	\$5.25
30	\$2.00	\$2.75		\$0.75	\$5.50
31	\$2.00	\$2.75		\$0.75	\$5.50
32	\$2.00	\$2.75		\$0.75	\$5.50
33	\$2.00	\$2.75		\$0.75	\$5.50
34	\$2.00	\$3.00		\$0.75	\$5.75
35	\$2.00	\$3.00		\$0.75	\$5.75
36	\$2.00	\$3.00		\$0.75	\$5.75
37	\$2.00	\$3.00		\$0.75	\$5.75
38	\$2.00	\$3.00		\$0.75	\$5.75
39	\$2.00	\$3.00		\$0.75	\$5.75

Exhibit 1: Snapshot of Raw Trip Data

### 3.3.2 Interpretation of Data

Based on over 1,000 lines of data extracted from individual driver time sheets, the average fares were approximately \$17.50 and \$25.00 for a winter and summer month, respectively.

The upper bound of 90% of trip fares of the representative sample set fell between \$85 and \$90 for both seasons. This upper bound was chosen to represent the minimum allowable charge that ensures 90% of ridership is not redirected towards alternative public transportation options that operate in less regulated markets.

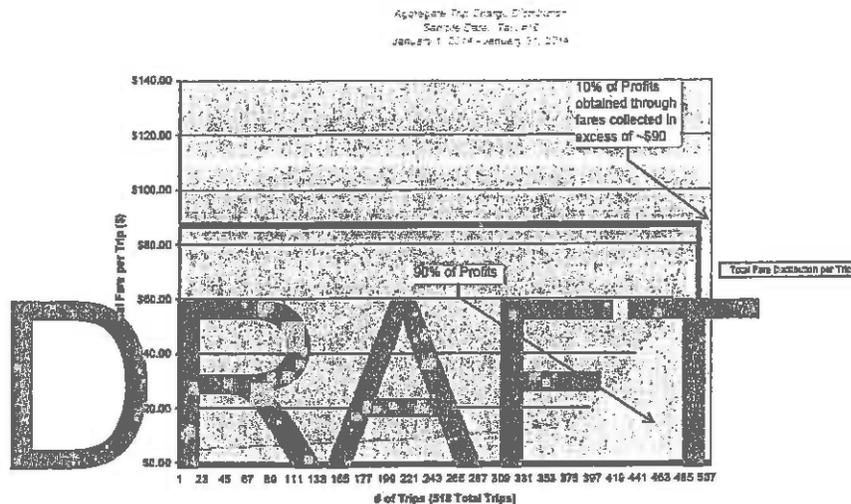


Exhibit 2: Total Fare Distribution for January 1, 2014 – January 31, 2014 for Taxi #16

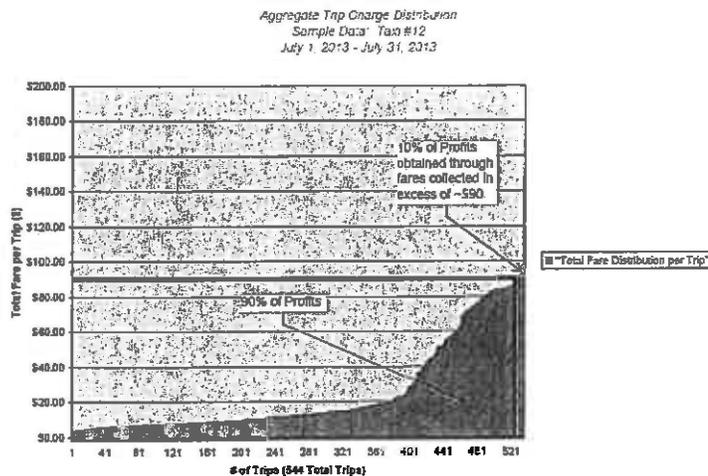


Exhibit 3: Total Fare Distribution for July 1, 2013 – July 31, 2013 for Taxi #12

Stone Gables Engineering Services, LLC  
P.O. Box 486  
Newport, RI 02840  
Phone: 401.662.9676 Fax: 508.229.0678  
Email: [stonegablesllc@aol.com](mailto:stonegablesllc@aol.com)  
Web: [www.sge-llc.com](http://www.sge-llc.com)

---

The fares between \$90 and upwards of \$135 are regarded as essential revenue that contributes significantly towards the company's estimated profit margin of 10%. Stone Gables Engineering is of the opinion that a taxi operator would still be able to compete for most of these customers, as these riders presumably represent a very small percentage of the ridership needing transportation to more remote locations essentially on demand.

#### 4.0 CONCLUSIONS AND RECOMMENDATIONS

Based on the distribution of trip charge analysis, it is recommended that the Minimum Allowable Charge be established at \$90.00 in order to restrict PMV operators from compromising the profitability of a taxicab operator so that beyond profitability, the company may continue to meet the needs of ridership dependent on such regulated public transportation.

DRAFT

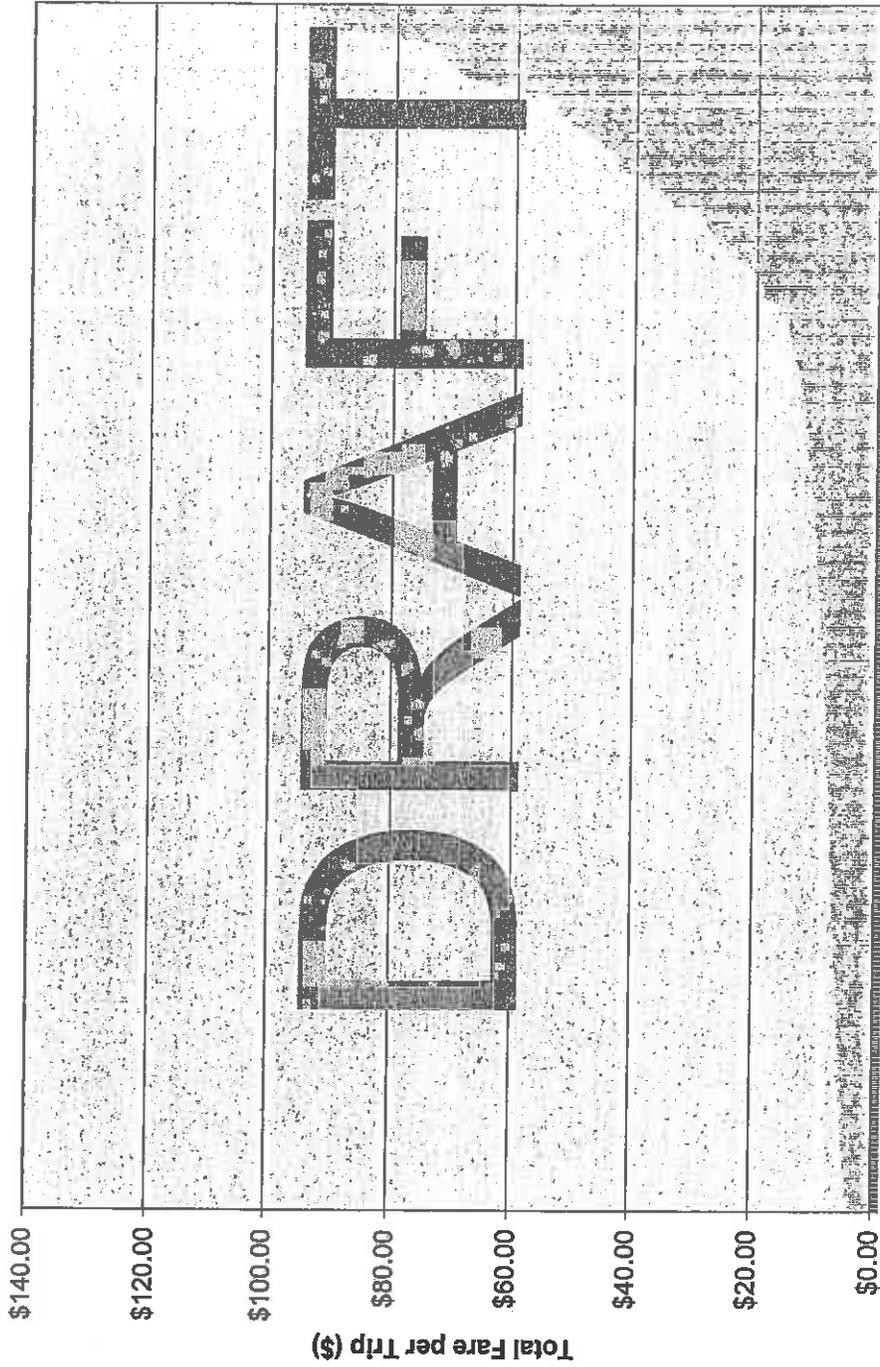
Stone Gables Engineering Services, LLC  
P.O. Box 486  
Newport, RI 02840  
Phone: 401.662.9676 Fax: 508.229.0678  
Email: [stonegablesllc@aol.com](mailto:stonegablesllc@aol.com)  
Web: [www.sge-llc.com](http://www.sge-llc.com)

---

Exhibits

DRAFT

Aggregate Trip Charge Distribution  
 Sample Data: Taxi #16  
 January 1, 2014 - January 31, 2014



Total Fare Distribution per Trip

1 23 45 67 89 111 133 155 177 199 221 243 265 287 309 331 353 375 397 419 441 463 485 507  
 # of Trips (518 Total Trips)

**Data Sampling for Minimum Allowable Charge Operations Research (2014)**

**Taxi # 16**

Data Start Date: January 1, 2014  
 Data End Date: January 31, 2014

Trip #	1/10th Mile Charge	Additional Mileage Charge	Additional Person Charge	Emergency Fuel Charge	Total Cost of Trip
1	\$2.00	\$0.75		\$0.75	\$3.50
2	\$2.00	\$0.75		\$0.75	\$3.50
3	\$2.00	\$1.00		\$0.75	\$3.75
4	\$2.00	\$1.00		\$0.75	\$3.75
5	\$2.00	\$1.00		\$0.75	\$3.75
6	\$2.00	\$1.00		\$0.75	\$3.75
7	\$2.00	\$1.25		\$0.75	\$4.00
8	\$2.00	\$1.25		\$0.75	\$4.00
9	\$2.00	\$1.25		\$0.75	\$4.00
10	\$2.00	\$1.25		\$0.75	\$4.00
11	\$2.00	\$1.25		\$0.75	\$4.00
12	\$2.00	\$1.25		\$0.75	\$4.00
13	\$2.00	\$1.50		\$0.75	\$4.25
14	\$2.00	\$1.50		\$0.75	\$4.25
15	\$2.00	\$1.50		\$0.75	\$4.25
16	\$2.00	\$1.50		\$0.75	\$4.25
17	\$2.00	\$1.50		\$0.75	\$4.25
18	\$2.00	\$1.50		\$0.75	\$4.25
19	\$2.00	\$1.75		\$0.75	\$4.50
20	\$2.00	\$1.75		\$0.75	\$4.50
21	\$2.00	\$1.75		\$0.75	\$4.50
22	\$2.00	\$1.75		\$0.75	\$4.50
23	\$2.00	\$1.75		\$0.75	\$4.50
24	\$2.00	\$1.75		\$0.75	\$4.50
25	\$2.00	\$1.75		\$0.75	\$4.50
26	\$2.00	\$2.00		\$0.75	\$4.75
27	\$2.00	\$2.00		\$0.75	\$4.75
28	\$2.00	\$2.00		\$0.75	\$4.75
29	\$2.00	\$2.00		\$0.75	\$4.75
30	\$2.00	\$2.00		\$0.75	\$4.75
31	\$2.00	\$2.00		\$0.75	\$4.75
32	\$2.00	\$2.00		\$0.75	\$4.75
33	\$2.00	\$2.00		\$0.75	\$4.75
34	\$2.00	\$2.25		\$0.75	\$5.00
35	\$2.00	\$2.25		\$0.75	\$5.00
36	\$2.00	\$2.25		\$0.75	\$5.00
37	\$2.00	\$2.25		\$0.75	\$5.00
38	\$2.00	\$2.25		\$0.75	\$5.00
39	\$2.00	\$2.25		\$0.75	\$5.00
40	\$2.00	\$2.25		\$0.75	\$5.00
41	\$2.00	\$2.25		\$0.75	\$5.00
42	\$2.00	\$2.25		\$0.75	\$5.00
43	\$2.00	\$2.25		\$0.75	\$5.00
44	\$2.00	\$2.25		\$0.75	\$5.00
45	\$2.00	\$2.25		\$0.75	\$5.00
46	\$2.00	\$2.25		\$0.75	\$5.00
47	\$2.00	\$2.25		\$0.75	\$5.00
48	\$2.00	\$2.50		\$0.75	\$5.25
49	\$2.00	\$2.50		\$0.75	\$5.25

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51	\$2.00	\$2.50		\$0.75	\$5.25
52	\$2.00	\$2.50		\$0.75	\$5.25
53	\$2.00	\$2.50		\$0.75	\$5.25
54	\$2.00	\$2.50		\$0.75	\$5.25
55	\$2.00	\$2.50		\$0.75	\$5.25
56	\$2.00	\$2.50		\$0.75	\$5.25
57	\$2.00	\$1.50	\$1.00	\$0.75	\$5.25
58	\$2.00	\$2.50		\$0.75	\$5.25
59	\$2.00	\$2.50		\$0.75	\$5.25
60	\$2.00	\$2.50		\$0.75	\$5.25
61	\$2.00	\$2.75		\$0.75	\$5.50
62	\$2.00	\$2.75		\$0.75	\$5.50
63	\$2.00	\$2.75		\$0.75	\$5.50
64	\$2.00	\$2.75		\$0.75	\$5.50
65	\$2.00	\$2.75		\$0.75	\$5.50
66	\$2.00	\$2.75		\$0.75	\$5.50
67	\$2.00	\$2.75		\$0.75	\$5.50
68	\$2.00	\$2.75		\$0.75	\$5.50
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71	\$2.00	\$2.75		\$0.75	\$5.50
72	\$2.00	\$2.75		\$0.75	\$5.50
73	\$2.00	\$2.75		\$0.75	\$5.50
74	\$2.00	\$3.00		\$0.75	\$5.75
75	\$2.00	\$3.00		\$0.75	\$5.75
76	\$2.00	\$3.00		\$0.75	\$5.75
77	\$2.00	\$3.00		\$0.75	\$5.75
78	\$2.00	\$3.00		\$0.75	\$5.75
79	\$2.00	\$3.00		\$0.75	\$5.75
80	\$2.00	\$3.00		\$0.75	\$5.75
81	\$2.00	\$3.00		\$0.75	\$5.75
82	\$2.00	\$3.00		\$0.75	\$5.75
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84	\$2.00	\$3.00		\$0.75	\$5.75
85	\$2.00	\$3.00		\$0.75	\$5.75
86	\$2.00	\$3.00		\$0.75	\$5.75
87	\$2.00	\$3.00		\$0.75	\$5.75
88	\$2.00	\$3.00		\$0.75	\$5.75
89	\$2.00	\$3.00		\$0.75	\$5.75
90	\$2.00	\$3.00		\$0.75	\$5.75
91	\$2.00	\$3.25		\$0.75	\$6.00
92	\$2.00	\$2.25	\$1.00	\$0.75	\$6.00
93	\$2.00	\$3.25		\$0.75	\$6.00
94	\$2.00	\$3.25		\$0.75	\$6.00
95	\$2.00	\$1.25	\$2.00	\$0.75	\$6.00
96	\$2.00	\$3.25		\$0.75	\$6.00
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101	\$2.00	\$2.25	\$1.00	\$0.75	\$6.00
102	\$2.00	\$1.25	\$2.00	\$0.75	\$6.00
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105	\$2.00	\$3.50		\$0.75	\$6.25
106	\$2.00	\$3.50		\$0.75	\$6.25
107	\$2.00	\$3.50		\$0.75	\$6.25
108	\$2.00	\$3.50		\$0.75	\$6.25

DRAFT

109	\$2.00	\$3.50		\$0.75	\$6.25
110	\$2.00	\$3.50		\$0.75	\$6.25
111	\$2.00	\$3.50		\$0.75	\$6.25
112	\$2.00	\$3.50		\$0.75	\$6.25
113	\$2.00	\$3.50		\$0.75	\$6.25
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119	\$2.00	\$3.75		\$0.75	\$6.50
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121	\$2.00	\$3.75		\$0.75	\$6.50
122	\$2.00	\$3.75		\$0.75	\$6.50
123	\$2.00	\$3.75		\$0.75	\$6.50
124	\$2.00	\$3.75		\$0.75	\$6.50
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131	\$2.00	\$4.00		\$0.75	\$6.75
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149	\$2.00	\$4.25		\$0.75	\$7.00
150	\$2.00	\$4.25		\$0.75	\$7.00
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152	\$2.00	\$4.25		\$0.75	\$7.00
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157	\$2.00	\$4.25		\$0.75	\$7.00
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161	\$2.00	\$4.25		\$0.75	\$7.00
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163	\$2.00	\$4.50		\$0.75	\$7.25
164	\$2.00	\$4.50		\$0.75	\$7.25
165	\$2.00	\$4.50		\$0.75	\$7.25
166	\$2.00	\$3.50	\$1.00	\$0.75	\$7.25
167	\$2.00	\$4.50		\$0.75	\$7.25

DRAFT

168	\$2.00	\$4.50		\$0.75	\$7.25
169	\$2.00	\$4.50		\$0.75	\$7.25
170	\$2.00	\$4.50		\$0.75	\$7.25
171	\$2.00	\$4.50		\$0.75	\$7.25
172	\$2.00	\$4.50		\$0.75	\$7.25
173	\$2.00	\$4.50		\$0.75	\$7.25
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179	\$2.00	\$4.75		\$0.75	\$7.50
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190	\$2.00	\$5.00		\$0.75	\$7.75
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195	\$2.00	\$5.00		\$0.75	\$7.75
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210	\$2.00	\$5.25		\$0.75	\$8.00
211	\$2.00	\$5.25		\$0.75	\$8.00
212	\$2.00	\$4.50		\$1.50	\$8.00
213	\$2.00	\$5.25		\$0.75	\$8.00
214	\$2.00	\$5.25		\$0.75	\$8.00
215	\$2.00	\$5.25		\$0.75	\$8.00
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221	\$2.00	\$5.50		\$0.75	\$8.25
222	\$2.00	\$5.50		\$0.75	\$8.25
223	\$2.00	\$2.50	\$3.00	\$0.75	\$8.25
224	\$2.00	\$5.50		\$0.75	\$8.25
225	\$2.00	\$5.50		\$0.75	\$8.25
226	\$2.00	\$5.50		\$0.75	\$8.25

DRAFT

227	\$2.00	\$5.50		\$0.75	\$8.25
228	\$2.00	\$5.50		\$0.75	\$8.25
229	\$2.00	\$5.50		\$0.75	\$8.25
230	\$2.00	\$4.75	\$1.00	\$0.75	\$8.50
231	\$2.00	\$5.75		\$0.75	\$8.50
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235	\$2.00	\$5.75		\$0.75	\$8.50
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239	\$2.00	\$6.00		\$0.75	\$8.75
240	\$2.00	\$6.00		\$0.75	\$8.75
241	\$2.00	\$6.00		\$0.75	\$8.75
242	\$2.00	\$4.00	\$2.00	\$0.75	\$8.75
243	\$2.00	\$6.00		\$0.75	\$8.75
244	\$2.00	\$6.00		\$0.75	\$8.75
245	\$2.00	\$6.00		\$0.75	\$8.75
246	\$2.00	\$6.00		\$0.75	\$8.75
247	\$2.00	\$6.00		\$0.75	\$8.75
248	\$2.00	\$6.00		\$0.75	\$8.75
249	\$2.00	\$6.00		\$0.75	\$8.75
250	\$2.00	\$6.25		\$0.75	\$9.00
251	\$2.00	\$6.25		\$0.75	\$9.00
252	\$2.00	\$6.25		\$0.75	\$9.00
253	\$2.00	\$6.25		\$0.75	\$9.00
254	\$2.00	\$6.25		\$0.75	\$9.00
255	\$2.00	\$5.50		\$1.50	\$9.00
256	\$2.00	\$6.25		\$0.75	\$9.00
257	\$2.00	\$6.25		\$0.75	\$9.00
258	\$2.00	\$6.25		\$0.75	\$9.00
259	\$2.00	\$5.25	\$1.00	\$0.75	\$9.00
260	\$2.00	\$6.50		\$0.75	\$9.25
261	\$2.00	\$6.50		\$0.75	\$9.25
262	\$2.00	\$4.50	\$2.00	\$0.75	\$9.25
263	\$2.00	\$6.50		\$0.75	\$9.25
264	\$2.00	\$3.50	\$3.00	\$0.75	\$9.25
265	\$2.00	\$6.75		\$0.75	\$9.50
266	\$2.00	\$6.75		\$0.75	\$9.50
267	\$2.00	\$6.75		\$0.75	\$9.50
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269	\$2.00	\$6.75		\$0.75	\$9.50
270	\$2.00	\$6.75		\$0.75	\$9.50
271	\$2.00	\$2.75	\$4.00	\$0.75	\$9.50
272	\$2.00	\$6.75		\$0.75	\$9.50
273	\$2.00	\$7.00		\$0.75	\$9.75
274	\$2.00	\$7.00		\$0.75	\$9.75
275	\$2.00	\$7.00		\$0.75	\$9.75
276	\$2.00	\$7.00		\$0.75	\$9.75
277	\$2.00	\$6.00	\$1.00	\$0.75	\$9.75
278	\$2.00	\$7.00		\$0.75	\$9.75
279	\$2.00	\$7.00		\$0.75	\$9.75
280	\$2.00	\$7.00		\$0.75	\$9.75
281	\$2.00	\$7.00		\$0.75	\$9.75
282	\$2.00	\$7.00		\$0.75	\$9.75
283	\$2.00	\$7.00		\$0.75	\$9.75
284	\$2.00	\$6.00	\$1.00	\$0.75	\$9.75
285	\$2.00	\$5.00	\$2.00	\$0.75	\$9.75

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287	\$2.00	\$7.00		\$0.75	\$9.75
288	\$2.00	\$7.25		\$0.75	\$10.00
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291	\$2.00	\$7.25		\$0.75	\$10.00
292	\$2.00	\$7.25		\$0.75	\$10.00
293	\$2.00	\$6.50		\$1.50	\$10.00
294	\$2.00	\$7.25		\$0.75	\$10.00
295	\$2.00	\$3.25	\$4.00	\$0.75	\$10.00
296	\$2.00	\$7.25		\$0.75	\$10.00
297	\$2.00	\$7.25		\$0.75	\$10.00
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299	\$2.00	\$7.50		\$0.75	\$10.25
300	\$2.00	\$7.50		\$0.75	\$10.25
301	\$2.00	\$7.50		\$0.75	\$10.25
302	\$2.00	\$7.50		\$0.75	\$10.25
303	\$2.00	\$7.50		\$0.75	\$10.25
304	\$2.00	\$7.50		\$0.75	\$10.25
305	\$2.00	\$7.50		\$0.75	\$10.25
306	\$2.00	\$7.50		\$0.75	\$10.25
307	\$2.00	\$7.75		\$0.75	\$10.50
308	\$2.00	\$7.75		\$0.75	\$10.50
309	\$2.00	\$7.75		\$0.75	\$10.50
310	\$2.00	\$6.75	\$1.00	\$0.75	\$10.50
311	\$2.00	\$7.75		\$0.75	\$10.50
312	\$2.00	\$7.75		\$0.75	\$10.50
313	\$2.00	\$7.75		\$0.75	\$10.50
314	\$2.00	\$7.75		\$0.75	\$10.50
315	\$2.00	\$7.75	\$3.00	\$0.75	\$10.75
316	\$2.00	\$2.00	\$6.00	\$0.75	\$10.75
317	\$2.00	\$7.00	\$1.00	\$0.75	\$10.75
318	\$2.00	\$5.25	\$3.00	\$0.75	\$11.00
319	\$2.00	\$4.50	\$4.00	\$0.75	\$11.25
320	\$2.00	\$7.50	\$1.00	\$0.75	\$11.25
321	\$2.00	\$5.50	\$3.00	\$0.75	\$11.25
322	\$2.00	\$6.50	\$2.00	\$0.75	\$11.25
323	\$2.00	\$8.00		\$1.50	\$11.50
324	\$2.00	\$8.00		\$1.50	\$11.50
325	\$2.00	\$8.00		\$1.50	\$11.50
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329	\$2.00	\$8.00		\$1.50	\$11.50
330	\$2.00	\$4.75	\$4.00	\$0.75	\$11.50
331	\$2.00	\$8.00		\$1.50	\$11.50
332	\$2.00	\$8.00		\$1.50	\$11.50
333	\$2.00	\$8.25		\$1.50	\$11.75
334	\$2.00	\$7.00	\$2.00	\$0.75	\$11.75
335	\$2.00	\$8.25		\$1.50	\$11.75
336	\$2.00	\$8.25		\$1.50	\$11.75
337	\$2.00	\$8.25		\$1.50	\$11.75
338	\$2.00	\$8.50		\$1.50	\$12.00
339	\$2.00	\$8.50		\$1.50	\$12.00
340	\$2.00	\$6.25	\$3.00	\$0.75	\$12.00
341	\$2.00	\$8.75		\$1.50	\$12.25
342	\$2.00	\$5.50	\$4.00	\$0.75	\$12.25
343	\$2.00	\$9.50		\$0.75	\$12.25
344	\$2.00	\$9.00		\$1.50	\$12.50

345	\$2.00	\$9.00		\$1.50	\$12.50
346	\$2.00	\$9.00		\$1.50	\$12.50
347	\$2.00	\$9.00		\$1.50	\$12.50
348	\$2.00	\$9.00		\$1.50	\$12.50
349	\$2.00	\$9.75		\$0.75	\$12.50
350	\$2.00	\$9.00		\$1.50	\$12.50
351	\$2.00	\$9.25		\$1.50	\$12.75
352	\$2.00	\$9.25		\$1.50	\$12.75
353	\$2.00	\$6.00	\$4.00	\$0.75	\$12.75
354	\$2.00	\$9.25		\$1.50	\$12.75
355	\$2.00	\$9.25		\$1.50	\$12.75
356	\$2.00	\$9.25		\$1.50	\$12.75
357	\$2.00	\$9.50		\$1.50	\$13.00
358	\$2.00	\$8.50	\$1.00	\$1.50	\$13.00
359	\$2.00	\$10.00		\$1.50	\$13.50
360	\$2.00	\$10.00		\$1.50	\$13.50
361	\$2.00	\$6.75	\$4.00	\$0.75	\$13.50
362	\$2.00	\$10.00		\$1.50	\$13.50
363	\$2.00	\$10.25		\$1.50	\$13.75
364	\$2.00	\$10.25		\$1.50	\$13.75
365	\$2.00	\$10.25		\$1.50	\$13.75
366	\$2.00	\$9.50	\$1.00	\$1.50	\$14.00
367	\$2.00	\$9.50	\$1.00	\$1.50	\$14.00
368	\$2.00	\$9.75	\$1.00	\$1.50	\$14.25
369	\$2.00	\$9.75	\$1.00	\$1.50	\$14.25
370	\$2.00	\$11.50		\$0.75	\$14.25
371	\$2.00	\$11.00		\$1.50	\$14.50
372	\$2.00	\$11.00		\$1.50	\$14.50
373	\$2.00	\$11.00		\$1.50	\$14.50
374	\$2.00	\$11.00	\$4.00	\$1.50	\$14.50
375	\$2.00	\$7.75	\$4.00	\$0.75	\$14.50
376	\$2.00	\$11.50		\$1.50	\$15.00
377	\$2.00	\$11.75		\$1.50	\$15.25
378	\$2.00	\$11.75		\$1.50	\$15.25
379	\$2.00	\$11.75		\$1.50	\$15.25
380	\$2.00	\$8.00	\$4.00	\$1.50	\$15.50
381	\$2.00	\$12.25		\$1.50	\$15.75
382	\$2.00	\$8.50	\$4.00	\$1.50	\$16.00
383	\$2.00	\$12.50		\$1.50	\$16.00
384	\$2.00	\$12.75		\$1.50	\$16.25
385	\$2.00	\$13.75		\$1.50	\$17.25
386	\$2.00	\$13.75		\$1.50	\$17.25
387	\$2.00	\$9.00	\$5.00	\$1.50	\$17.50
388	\$2.00	\$14.50		\$1.50	\$18.00
389	\$2.00	\$15.25		\$1.50	\$18.75
390	\$2.00	\$15.25		\$1.50	\$18.75
391	\$2.00	\$15.50		\$1.50	\$19.00
392	\$2.00	\$15.50		\$1.50	\$19.00
393	\$2.00	\$12.75	\$3.00	\$1.50	\$19.25
394	\$2.00	\$16.00		\$1.50	\$19.50
395	\$2.00	\$16.50		\$1.50	\$20.00
396	\$2.00	\$16.50		\$1.50	\$20.00
397	\$2.00	\$16.75		\$1.50	\$20.25
398	\$2.00	\$13.00	\$4.00	\$1.50	\$20.50
399	\$2.00	\$17.50		\$1.50	\$21.00
400	\$2.00	\$16.75	\$1.00	\$1.50	\$21.25
401	\$2.00	\$18.00		\$1.50	\$21.50
402	\$2.00	\$18.50		\$1.50	\$22.00
403	\$2.00	\$19.25		\$1.50	\$22.75

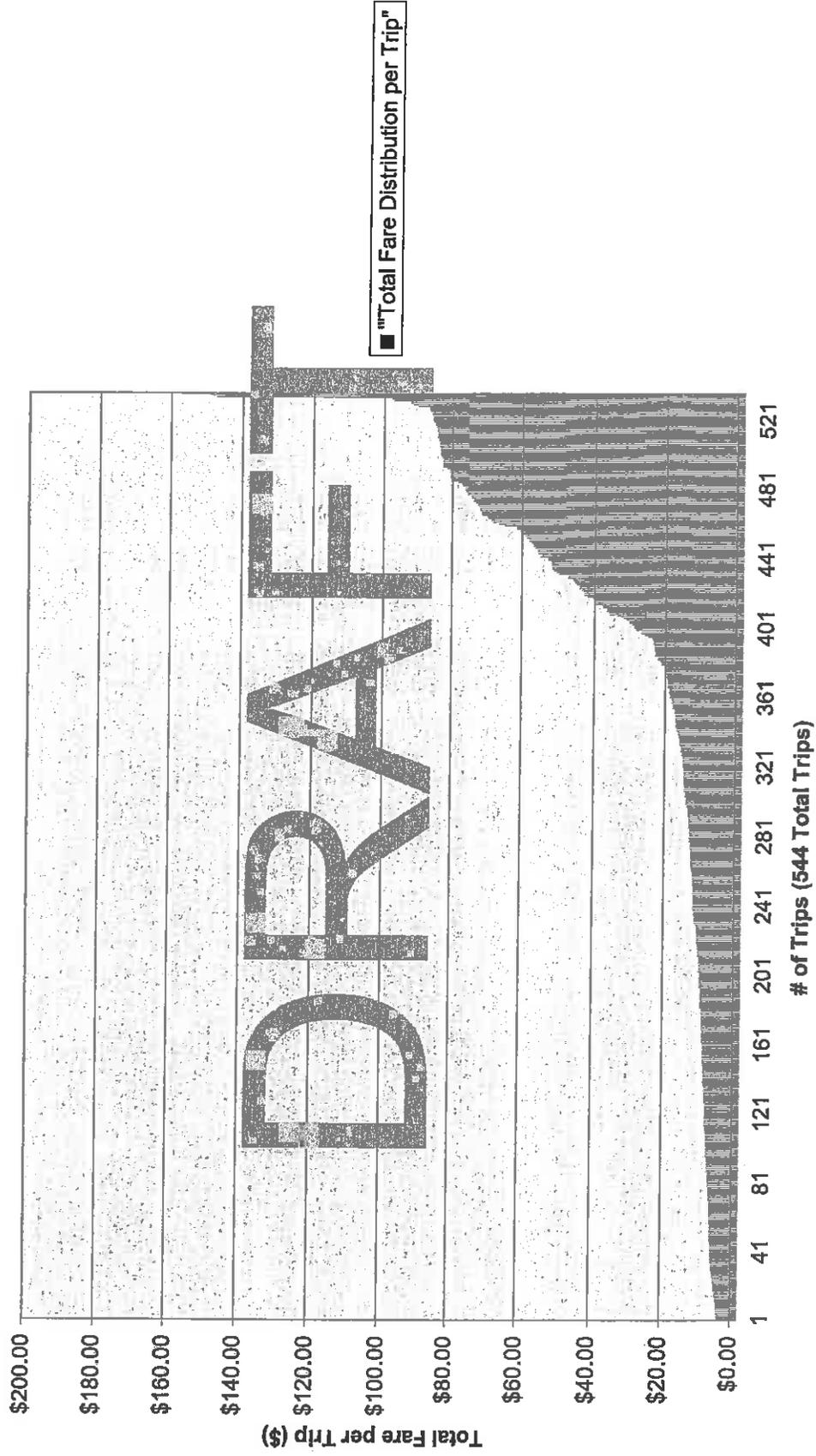
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404	\$2.00	\$19.50		\$1.50	\$23.00
405	\$2.00	\$19.50		\$1.50	\$23.00
406	\$2.00	\$19.50		\$1.50	\$23.00
407	\$2.00	\$19.50		\$1.50	\$23.00
408	\$2.00	\$19.75		\$1.50	\$23.25
409	\$2.00	\$19.25	\$1.00	\$1.50	\$23.75
410	\$2.00	\$20.50	\$1.00	\$1.50	\$25.00
411	\$2.00	\$21.75		\$1.50	\$25.25
412	\$2.00	\$22.50		\$1.50	\$26.00
413	\$2.00	\$22.50		\$1.50	\$26.00
414	\$2.00	\$23.75		\$1.50	\$27.25
415	\$2.00	\$24.00		\$1.50	\$27.50
416	\$2.00	\$24.50		\$1.50	\$28.00
417	\$2.00	\$20.75	\$4.00	\$1.50	\$28.25
418	\$2.00	\$25.00		\$1.50	\$28.50
419	\$2.00	\$25.00		\$1.50	\$28.50
420	\$2.00	\$25.25		\$1.50	\$28.75
421	\$2.00	\$25.25		\$1.50	\$28.75
422	\$2.00	\$21.75	\$4.00	\$1.50	\$29.25
423	\$2.00	\$26.00		\$1.50	\$29.50
424	\$2.00	\$26.00		\$1.50	\$29.50
425	\$2.00	\$26.00		\$1.50	\$29.50
426	\$2.00	\$30.25		\$1.50	\$33.75
427	\$2.00	\$30.50		\$1.50	\$34.00
428	\$2.00	\$30.75		\$1.50	\$34.25
429	\$2.00	\$32.00		\$1.50	\$35.50
430	\$2.00	\$32.25		\$1.50	\$35.75
431	\$2.00	\$32.50		\$1.50	\$36.00
432	\$2.00	\$32.50		\$1.50	\$36.00
433	\$2.00	\$33.00		\$1.50	\$36.75
434	\$2.00	\$34.00		\$1.50	\$37.50
435	\$2.00	\$34.25		\$1.50	\$37.75
436	\$2.00	\$34.50		\$1.50	\$38.00
437	\$2.00	\$36.00		\$1.50	\$39.50
438	\$2.00	\$36.00		\$1.50	\$39.50
439	\$2.00	\$36.75		\$1.50	\$40.25
440	\$2.00	\$38.25		\$1.50	\$41.75
441	\$2.00	\$38.50		\$1.50	\$42.00
442	\$2.00	\$39.00		\$1.50	\$42.50
443	\$2.00	\$39.50		\$1.50	\$43.00
444	\$2.00	\$39.50		\$1.50	\$43.00
445	\$2.00	\$39.50		\$1.50	\$43.00
446	\$2.00	\$40.00		\$1.50	\$43.50
447	\$2.00	\$40.50		\$1.50	\$44.00
448	\$2.00	\$40.50		\$1.50	\$44.00
449	\$2.00	\$41.00		\$1.50	\$44.50
450	\$2.00	\$41.75		\$1.50	\$45.25
451	\$2.00	\$42.50		\$1.50	\$46.00
452	\$2.00	\$43.00		\$1.50	\$46.50
453	\$2.00	\$43.00		\$1.50	\$46.50
454	\$2.00	\$43.25		\$1.50	\$46.75
455	\$2.00	\$44.25		\$1.50	\$47.75
456	\$2.00	\$45.00		\$1.50	\$48.50
457	\$2.00	\$45.00		\$1.50	\$48.50
458	\$2.00	\$45.25		\$1.50	\$48.75
459	\$2.00	\$46.75		\$1.50	\$50.25
460	\$2.00	\$47.50		\$1.50	\$51.00
461	\$2.00	\$47.50		\$1.50	\$51.00
462	\$2.00	\$48.00		\$1.50	\$51.50

463	\$2.00	\$48.75		\$1.50	\$52.25
464	\$2.00	\$49.25		\$1.50	\$52.75
465	\$2.00	\$49.25		\$1.50	\$52.75
466	\$2.00	\$50.00		\$1.50	\$53.50
467	\$2.00	\$50.00		\$1.50	\$53.50
468	\$2.00	\$50.00		\$1.50	\$53.50
469	\$2.00	\$50.00		\$1.50	\$53.50
470	\$2.00	\$50.50		\$1.50	\$54.00
471	\$2.00	\$50.75		\$1.50	\$54.25
472	\$2.00	\$51.50		\$1.50	\$55.00
473	\$2.00	\$52.00		\$1.50	\$55.50
474	\$2.00	\$55.25		\$1.50	\$58.75
475	\$2.00	\$57.25		\$1.50	\$60.75
476	\$2.00	\$59.00		\$1.50	\$62.50
477	\$2.00	\$60.00		\$1.50	\$63.50
478	\$2.00	\$60.50		\$1.50	\$64.00
479	\$2.00	\$63.50		\$1.50	\$67.00
480	\$2.00	\$65.25		\$1.50	\$68.75
481	\$2.00	\$66.25		\$1.50	\$69.75
482	\$2.00	\$66.50		\$1.50	\$70.00
483	\$2.00	\$67.25		\$1.50	\$70.75
484	\$2.00	\$67.50		\$1.50	\$71.00
485	\$2.00	\$68.00		\$1.50	\$71.50
486	\$2.00	\$68.00		\$1.50	\$71.50
487	\$2.00	\$68.25		\$1.50	\$71.75
488	\$2.00	\$69.25		\$1.50	\$72.75
489	\$2.00	\$69.25		\$1.50	\$72.75
490	\$2.00	\$69.25		\$1.50	\$72.75
491	\$2.00	\$69.50		\$1.50	\$73.00
492	\$2.00	\$69.50		\$1.50	\$73.00
493	\$2.00	\$70.25		\$1.50	\$73.75
494	\$2.00	\$71.00		\$1.50	\$74.50
495	\$2.00	\$72.50		\$1.50	\$76.00
496	\$2.00	\$79.00		\$1.50	\$82.50
497	\$2.00	\$79.75		\$1.50	\$83.25
498	\$2.00	\$80.25		\$1.50	\$83.75
499	\$2.00	\$83.00		\$1.50	\$86.50
500	\$2.00	\$86.50		\$1.50	\$90.00
501	\$2.00	\$86.75		\$1.50	\$90.25
502	\$2.00	\$88.00		\$1.50	\$91.50
503	\$2.00	\$88.25		\$1.50	\$91.75
504	\$2.00	\$88.25		\$1.50	\$91.75
505	\$2.00	\$88.50		\$1.50	\$92.00
506	\$2.00	\$88.50		\$1.50	\$92.00
507	\$2.00	\$88.50		\$1.50	\$92.00
508	\$2.00	\$89.50		\$1.50	\$93.00
509	\$2.00	\$94.00		\$1.50	\$97.50
510	\$2.00	\$130.00		\$1.50	\$133.50
	\$1,020.00	\$7,528.50	\$124.00	\$517.50	\$9,190.00

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Aggregate Trip Charge Distribution  
 Sample Data: Taxi #12  
 July 1, 2013 - July 31, 2013



**Data Sampling for Minimum Allowable Charge Operations Research (2014)**

**Taxi # 12**

Data Start Date: July 1, 2013  
 Data End Date: July 31, 2013

Trip #	1/10th Mile Charge	Additional Mileage Charge	Additional Person Charge	Emergency Fuel Charge	Total Cost of Trip
1	\$2.00	\$0.00		\$0.75	\$2.75
2	\$2.00	\$1.00		\$0.75	\$3.75
3	\$2.00	\$1.00		\$0.75	\$3.75
4	\$2.00	\$1.00		\$0.75	\$3.75
5	\$2.00	\$1.25		\$0.75	\$4.00
6	\$2.00	\$1.25		\$0.75	\$4.00
7	\$2.00	\$1.25		\$0.75	\$4.00
8	\$2.00	\$1.25		\$0.75	\$4.00
9	\$2.00	\$1.25		\$0.75	\$4.00
10	\$2.00	\$1.25		\$0.75	\$4.00
11	\$2.00	\$1.25		\$0.75	\$4.00
12	\$2.00	\$1.50		\$0.75	\$4.25
13	\$2.00	\$1.50		\$0.75	\$4.25
14	\$2.00	\$1.50		\$0.75	\$4.25
15	\$2.00	\$1.75		\$0.75	\$4.50
16	\$2.00	\$1.75		\$0.75	\$4.50
17	\$2.00	\$1.75		\$0.75	\$4.50
18	\$2.00	\$2.00		\$0.75	\$4.75
19	\$2.00	\$2.00		\$0.75	\$4.75
20	\$2.00	\$2.00		\$0.75	\$4.75
21	\$2.00	\$2.00		\$0.75	\$4.75
22	\$2.00	\$2.00		\$0.75	\$4.75
23	\$2.00	\$2.25		\$0.75	\$5.00
24	\$2.00	\$2.25		\$0.75	\$5.00
25	\$2.00	\$2.25		\$0.75	\$5.00
26	\$2.00	\$2.50		\$0.75	\$5.25
27	\$2.00	\$2.50		\$0.75	\$5.25
28	\$2.00	\$2.50		\$0.75	\$5.25
29	\$2.00	\$2.50		\$0.75	\$5.25
30	\$2.00	\$2.75		\$0.75	\$5.50
31	\$2.00	\$2.75		\$0.75	\$5.50
32	\$2.00	\$2.75		\$0.75	\$5.50
33	\$2.00	\$2.75		\$0.75	\$5.50
34	\$2.00	\$3.00		\$0.75	\$5.75
35	\$2.00	\$3.00		\$0.75	\$5.75
36	\$2.00	\$3.00		\$0.75	\$5.75
37	\$2.00	\$3.00		\$0.75	\$5.75
38	\$2.00	\$3.00		\$0.75	\$5.75
39	\$2.00	\$3.00		\$0.75	\$5.75
40	\$2.00	\$3.00		\$0.75	\$5.75
41	\$2.00	\$3.00		\$0.75	\$5.75
42	\$2.00	\$3.00		\$0.75	\$5.75
43	\$2.00	\$3.00		\$0.75	\$5.75
44	\$2.00	\$3.00		\$0.75	\$5.75
45	\$2.00	\$3.00		\$0.75	\$5.75
46	\$2.00	\$3.00		\$0.75	\$5.75
47	\$2.00	\$3.25		\$0.75	\$6.00
48	\$2.00	\$2.25	\$1.00	\$0.75	\$6.00
49	\$2.00	\$3.25		\$0.75	\$6.00

50	\$2.00	\$3.25		\$0.75	\$6.00
51	\$2.00	\$3.25		\$0.75	\$6.00
52	\$2.00	\$3.25		\$0.75	\$6.00
53	\$2.00	\$3.25		\$0.75	\$6.00
54	\$2.00	\$3.25		\$0.75	\$6.00
55	\$2.00	\$3.25		\$0.75	\$6.00
56	\$2.00	\$3.25		\$0.75	\$6.00
57	\$2.00	\$3.50		\$0.75	\$6.25
58	\$2.00	\$3.50		\$0.75	\$6.25
59	\$2.00	\$3.50		\$0.75	\$6.25
60	\$2.00	\$3.50		\$0.75	\$6.25
61	\$2.00	\$3.50		\$0.75	\$6.25
62	\$2.00	\$3.50		\$0.75	\$6.25
63	\$2.00	\$3.50		\$0.75	\$6.25
64	\$2.00	\$3.50		\$0.75	\$6.25
65	\$2.00	\$3.50		\$0.75	\$6.25
66	\$2.00	\$3.50		\$0.75	\$6.25
67	\$2.00	\$3.50		\$0.75	\$6.25
68	\$2.00	\$3.50		\$0.75	\$6.25
69	\$2.00	\$3.50		\$0.75	\$6.25
70	\$2.00	\$3.50		\$0.75	\$6.25
71	\$2.00	\$3.75		\$0.75	\$6.50
72	\$2.00	\$3.75		\$0.75	\$6.50
73	\$2.00	\$3.75		\$0.75	\$6.50
74	\$2.00	\$3.75		\$0.75	\$6.50
75	\$2.00	\$3.75		\$0.75	\$6.50
76	\$2.00	\$3.75		\$0.75	\$6.50
77	\$2.00	\$3.75		\$0.75	\$6.50
78	\$2.00	\$3.75		\$0.75	\$6.50
79	\$2.00	\$4.00		\$0.75	\$6.75
80	\$2.00	\$4.00		\$0.75	\$6.75
81	\$2.00	\$4.00		\$0.75	\$6.75
82	\$2.00	\$4.00		\$0.75	\$6.75
83	\$2.00	\$4.00		\$0.75	\$6.75
84	\$2.00	\$4.00		\$0.75	\$6.75
85	\$2.00	\$4.00		\$0.75	\$6.75
86	\$2.00	\$4.00		\$0.75	\$6.75
87	\$2.00	\$4.25		\$0.75	\$7.00
88	\$2.00	\$4.25		\$0.75	\$7.00
89	\$2.00	\$4.25		\$0.75	\$7.00
90	\$2.00	\$4.25		\$0.75	\$7.00
91	\$2.00	\$1.25	\$3.00	\$0.75	\$7.00
92	\$2.00	\$4.25		\$0.75	\$7.00
93	\$2.00	\$4.25		\$0.75	\$7.00
94	\$2.00	\$4.25		\$0.75	\$7.00
95	\$2.00	\$4.25		\$0.75	\$7.00
96	\$2.00	\$4.50		\$0.75	\$7.25
97	\$2.00	\$4.50		\$0.75	\$7.25
98	\$2.00	\$4.50		\$0.75	\$7.25
99	\$2.00	\$4.50		\$0.75	\$7.25
100	\$2.00	\$4.50		\$0.75	\$7.25
101	\$2.00	\$4.50		\$0.75	\$7.25
102	\$2.00	\$4.50		\$0.75	\$7.25
103	\$2.00	\$2.50	\$2.00	\$0.75	\$7.25
104	\$2.00	\$4.50		\$0.75	\$7.25
105	\$2.00	\$2.50	\$2.00	\$0.75	\$7.25
106	\$2.00	\$2.50	\$2.00	\$0.75	\$7.25
107	\$2.00	\$4.50		\$0.75	\$7.25
108	\$2.00	\$4.50		\$0.75	\$7.25

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109	\$2.00	\$4.50		\$0.75	\$7.25
110	\$2.00	\$3.75	\$1.00	\$0.75	\$7.50
111	\$2.00	\$4.75		\$0.75	\$7.50
112	\$2.00	\$4.75		\$0.75	\$7.50
113	\$2.00	\$4.75		\$0.75	\$7.50
114	\$2.00	\$3.50	\$1.50	\$0.75	\$7.75
115	\$2.00	\$5.00		\$0.75	\$7.75
116	\$2.00	\$5.00		\$0.75	\$7.75
117	\$2.00	\$5.00		\$0.75	\$7.75
118	\$2.00	\$5.00		\$0.75	\$7.75
119	\$2.00	\$5.00		\$0.75	\$7.75
120	\$2.00	\$5.00		\$0.75	\$7.75
121	\$2.00	\$5.00		\$0.75	\$7.75
122	\$2.00	\$5.00		\$0.75	\$7.75
123	\$2.00	\$5.00		\$0.75	\$7.75
124	\$2.00	\$5.00		\$0.75	\$7.75
125	\$2.00	\$5.00		\$0.75	\$7.75
126	\$2.00	\$5.00		\$0.75	\$7.75
127	\$2.00	\$5.25		\$0.75	\$8.00
128	\$2.00	\$5.25		\$0.75	\$8.00
129	\$2.00	\$5.25		\$0.75	\$8.00
130	\$2.00	\$3.25	\$2.00	\$0.75	\$8.00
131	\$2.00	\$5.25		\$0.75	\$8.00
132	\$2.00	\$5.25		\$0.75	\$8.00
133	\$2.00	\$5.25		\$0.75	\$8.00
134	\$2.00	\$5.25		\$0.75	\$8.00
135	\$2.00	\$4.25	\$1.00	\$0.75	\$8.00
136	\$2.00	\$5.25		\$0.75	\$8.00
137	\$2.00	\$5.50		\$0.75	\$8.25
138	\$2.00	\$5.50		\$0.75	\$8.25
139	\$2.00	\$5.50		\$0.75	\$8.25
140	\$2.00	\$3.50	\$2.00	\$0.75	\$8.25
141	\$2.00	\$5.50		\$0.75	\$8.25
142	\$2.00	\$5.50		\$0.75	\$8.25
143	\$2.00	\$5.50		\$0.75	\$8.25
144	\$2.00	\$5.50		\$0.75	\$8.25
145	\$2.00	\$5.50		\$0.75	\$8.25
146	\$2.00	\$5.50		\$0.75	\$8.25
147	\$2.00	\$5.50		\$0.75	\$8.25
148	\$2.00	\$5.50		\$0.75	\$8.25
149	\$2.00	\$5.50		\$0.75	\$8.25
150	\$2.00	\$5.75		\$0.75	\$8.50
151	\$2.00	\$3.75	\$2.00	\$0.75	\$8.50
152	\$2.00	\$5.75		\$0.75	\$8.50
153	\$2.00	\$5.75		\$0.75	\$8.50
154	\$2.00	\$5.75		\$0.75	\$8.50
155	\$2.00	\$5.75		\$0.75	\$8.50
156	\$2.00	\$5.75		\$0.75	\$8.50
157	\$2.00	\$5.75		\$0.75	\$8.50
158	\$2.00	\$5.75		\$0.75	\$8.50
159	\$2.00	\$5.75		\$0.75	\$8.50
160	\$2.00	\$5.75		\$0.75	\$8.50
161	\$2.00	\$5.75		\$0.75	\$8.50
162	\$2.00	\$6.00		\$0.75	\$8.75
163	\$2.00	\$6.00		\$0.75	\$8.75
164	\$2.00	\$6.00		\$0.75	\$8.75
165	\$2.00	\$3.00	\$3.00	\$0.75	\$8.75
166	\$2.00	\$6.00		\$0.75	\$8.75
167	\$2.00	\$6.00		\$0.75	\$8.75

DRAFT

168	\$2.00	\$6.00		\$0.75	\$8.75
169	\$2.00	\$6.00		\$0.75	\$8.75
170	\$2.00	\$6.25		\$0.75	\$9.00
171	\$2.00	\$6.25		\$0.75	\$9.00
172	\$2.00	\$6.25		\$0.75	\$9.00
173	\$2.00	\$6.25		\$0.75	\$9.00
174	\$2.00	\$6.25		\$0.75	\$9.00
175	\$2.00	\$6.25		\$0.75	\$9.00
176	\$2.00	\$6.25		\$0.75	\$9.00
177	\$2.00	\$6.25		\$0.75	\$9.00
178	\$2.00	\$4.25	\$2.00	\$0.75	\$9.00
179	\$2.00	\$6.25		\$0.75	\$9.00
180	\$2.00	\$2.25	\$4.00	\$0.75	\$9.00
181	\$2.00	\$6.25		\$0.75	\$9.00
182	\$2.00	\$6.50		\$0.75	\$9.25
183	\$2.00	\$5.50	\$1.00	\$0.75	\$9.25
184	\$2.00	\$6.50		\$0.75	\$9.25
185	\$2.00	\$6.50		\$0.75	\$9.25
186	\$2.00	\$6.50		\$0.75	\$9.25
187	\$2.00	\$6.50		\$0.75	\$9.25
188	\$2.00	\$2.50	\$4.00	\$0.75	\$9.25
189	\$2.00	\$6.50		\$0.75	\$9.25
190	\$2.00	\$6.50		\$0.75	\$9.25
191	\$2.00	\$6.50		\$0.75	\$9.25
192	\$2.00	\$6.50		\$0.75	\$9.25
193	\$2.00	\$6.50		\$0.75	\$9.25
194	\$2.00	\$6.75		\$0.75	\$9.50
195	\$2.00	\$6.75		\$0.75	\$9.50
196	\$2.00	\$6.75		\$0.75	\$9.50
197	\$2.00	\$6.75		\$0.75	\$9.50
198	\$2.00	\$6.75		\$0.75	\$9.50
199	\$2.00	\$4.75	\$2.00	\$0.75	\$9.50
200	\$2.00	\$6.75		\$0.75	\$9.50
201	\$2.00	\$6.75		\$0.75	\$9.50
202	\$2.00	\$6.75		\$0.75	\$9.50
203	\$2.00	\$7.00		\$0.75	\$9.75
204	\$2.00	\$7.00		\$0.75	\$9.75
205	\$2.00	\$7.00		\$0.75	\$9.75
206	\$2.00	\$7.00		\$0.75	\$9.75
207	\$2.00	\$7.00		\$0.75	\$9.75
208	\$2.00	\$7.00		\$0.75	\$9.75
209	\$2.00	\$7.00		\$0.75	\$9.75
210	\$2.00	\$7.00		\$0.75	\$9.75
211	\$2.00	\$7.00		\$0.75	\$9.75
212	\$2.00	\$7.25		\$0.75	\$10.00
213	\$2.00	\$7.25		\$0.75	\$10.00
214	\$2.00	\$7.25		\$0.75	\$10.00
215	\$2.00	\$7.25		\$0.75	\$10.00
216	\$2.00	\$5.25	\$2.00	\$0.75	\$10.00
217	\$2.00	\$7.25		\$0.75	\$10.00
218	\$2.00	\$7.25		\$0.75	\$10.00
219	\$2.00	\$7.50		\$0.75	\$10.25
220	\$2.00	\$7.50		\$0.75	\$10.25
221	\$2.00	\$7.50		\$0.75	\$10.25
222	\$2.00	\$7.50		\$0.75	\$10.25
223	\$2.00	\$7.50		\$0.75	\$10.25
224	\$2.00	\$6.50	\$1.00	\$0.75	\$10.25
225	\$2.00	\$4.75	\$3.00	\$0.75	\$10.50
226	\$2.00	\$7.75		\$0.75	\$10.50

**DRAFT**

227	\$2.00	\$7.75		\$0.75	\$10.50
228	\$2.00	\$7.75		\$0.75	\$10.50
229	\$2.00	\$7.75		\$0.75	\$10.50
230	\$2.00	\$7.00	\$1.00	\$0.75	\$10.75
231	\$2.00	\$8.25		\$0.75	\$11.00
232	\$2.00	\$6.25	\$2.00	\$0.75	\$11.00
233	\$2.00	\$7.25	\$1.00	\$0.75	\$11.00
234	\$2.00	\$7.25	\$1.00	\$0.75	\$11.00
235	\$2.00	\$7.50	\$1.00	\$0.75	\$11.25
236	\$2.00	\$7.50	\$1.00	\$0.75	\$11.25
237	\$2.00	\$7.50	\$1.00	\$0.75	\$11.25
238	\$2.00	\$7.50	\$1.00	\$0.75	\$11.25
239	\$2.00	\$8.75		\$0.75	\$11.50
240	\$2.00	\$8.00		\$1.50	\$11.50
241	\$2.00	\$8.00		\$1.50	\$11.50
242	\$2.00	\$8.00		\$1.50	\$11.50
243	\$2.00	\$8.00		\$1.50	\$11.50
244	\$2.00	\$8.00		\$1.50	\$11.50
245	\$2.00	\$8.00		\$1.50	\$11.50
246	\$2.00	\$6.75	\$2.00	\$0.75	\$11.50
247	\$2.00	\$4.75	\$4.00	\$0.75	\$11.50
248	\$2.00	\$4.75	\$4.00	\$0.75	\$11.50
249	\$2.00	\$4.75	\$4.00	\$0.75	\$11.50
250	\$2.00	\$8.00		\$1.50	\$11.50
251	\$2.00	\$8.00		\$1.50	\$11.50
252	\$2.00	\$8.00		\$1.50	\$11.50
253	\$2.00	\$7.00	\$2.00	\$0.75	\$11.75
254	\$2.00	\$8.25		\$1.50	\$11.75
255	\$2.00	\$8.25		\$1.50	\$11.75
256	\$2.00	\$8.25	\$2.00	\$1.50	\$11.75
257	\$2.00	\$8.25		\$1.50	\$11.75
258	\$2.00	\$8.25		\$1.50	\$11.75
259	\$2.00	\$7.00	\$2.00	\$0.75	\$11.75
260	\$2.00	\$8.25		\$1.50	\$11.75
261	\$2.00	\$8.50		\$1.50	\$12.00
262	\$2.00	\$7.25	\$2.00	\$0.75	\$12.00
263	\$2.00	\$8.50		\$1.50	\$12.00
264	\$2.00	\$8.75		\$1.50	\$12.25
265	\$2.00	\$8.75		\$1.50	\$12.25
266	\$2.00	\$8.75		\$1.50	\$12.25
267	\$2.00	\$7.50	\$2.00	\$0.75	\$12.25
268	\$2.00	\$8.75		\$1.50	\$12.25
269	\$2.00	\$8.75		\$1.50	\$12.25
270	\$2.00	\$8.75		\$1.50	\$12.25
271	\$2.00	\$8.75		\$1.50	\$12.25
272	\$2.00	\$8.75		\$1.50	\$12.25
273	\$2.00	\$8.75		\$1.50	\$12.25
274	\$2.00	\$9.00		\$1.50	\$12.50
275	\$2.00	\$9.00		\$1.50	\$12.50
276	\$2.00	\$9.00		\$1.50	\$12.50
277	\$2.00	\$9.00		\$1.50	\$12.50
278	\$2.00	\$8.25	\$1.00	\$1.50	\$12.75
279	\$2.00	\$9.25		\$1.50	\$12.75
280	\$2.00	\$9.25		\$1.50	\$12.75
281	\$2.00	\$9.25		\$1.50	\$12.75
282	\$2.00	\$9.25		\$1.50	\$12.75
283	\$2.00	\$9.25		\$1.50	\$12.75
284	\$2.00	\$9.25		\$1.50	\$12.75
285	\$2.00	\$9.25		\$1.50	\$12.75

286	\$2.00	\$9.50		\$1.50	\$13.00
287	\$2.00	\$9.50		\$1.50	\$13.00
288	\$2.00	\$9.50		\$1.50	\$13.00
289	\$2.00	\$9.50		\$1.50	\$13.00
290	\$2.00	\$9.50		\$1.50	\$13.00
291	\$2.00	\$8.50	\$1.00	\$1.50	\$13.00
292	\$2.00	\$7.25	\$3.00	\$0.75	\$13.00
293	\$2.00	\$9.75		\$1.50	\$13.25
294	\$2.00	\$9.75		\$1.50	\$13.25
295	\$2.00	\$9.75		\$1.50	\$13.25
296	\$2.00	\$9.75		\$1.50	\$13.25
297	\$2.00	\$9.75		\$1.50	\$13.25
298	\$2.00	\$10.00		\$1.50	\$13.50
299	\$2.00	\$10.00		\$1.50	\$13.50
300	\$2.00	\$10.25		\$1.50	\$13.75
301	\$2.00	\$10.25		\$1.50	\$13.75
302	\$2.00	\$10.25		\$1.50	\$13.75
303	\$2.00	\$9.00	\$2.00	\$0.75	\$13.75
304	\$2.00	\$10.50		\$1.50	\$14.00
305	\$2.00	\$10.50		\$1.50	\$14.00
306	\$2.00	\$10.50		\$1.50	\$14.00
307	\$2.00	\$7.50	\$4.00	\$0.75	\$14.25
308	\$2.00	\$7.50	\$4.00	\$0.75	\$14.25
309	\$2.00	\$10.75		\$1.50	\$14.25
310	\$2.00	\$10.75		\$1.50	\$14.25
311	\$2.00	\$10.75		\$1.50	\$14.25
312	\$2.00	\$11.00		\$1.50	\$14.50
313	\$2.00	\$11.00		\$1.50	\$14.50
314	\$2.00	\$9.00	\$2.00	\$1.50	\$14.50
315	\$2.00	\$11.00		\$1.50	\$14.50
316	\$2.00	\$11.00		\$1.50	\$14.50
317	\$2.00	\$11.00		\$1.50	\$14.50
318	\$2.00	\$10.00	\$1.00	\$1.50	\$14.50
319	\$2.00	\$11.00		\$1.50	\$14.50
320	\$2.00	\$10.00	\$1.00	\$1.50	\$14.50
321	\$2.00	\$11.25		\$1.50	\$14.75
322	\$2.00	\$9.25	\$2.00	\$1.50	\$14.75
323	\$2.00	\$11.25		\$1.50	\$14.75
324	\$2.00	\$8.25	\$3.00	\$1.50	\$14.75
325	\$2.00	\$11.25		\$1.50	\$14.75
326	\$2.00	\$11.25		\$1.50	\$14.75
327	\$2.00	\$11.25		\$1.50	\$14.75
328	\$2.00	\$9.50	\$2.00	\$1.50	\$15.00
329	\$2.00	\$11.50		\$1.50	\$15.00
330	\$2.00	\$10.75	\$1.00	\$1.50	\$15.25
331	\$2.00	\$11.75		\$1.50	\$15.25
332	\$2.00	\$9.75	\$2.00	\$1.50	\$15.25
333	\$2.00	\$11.75		\$1.50	\$15.25
334	\$2.00	\$9.25	\$3.00	\$1.50	\$15.75
335	\$2.00	\$10.25	\$2.00	\$1.50	\$15.75
336	\$2.00	\$11.25	\$1.00	\$1.50	\$15.75
337	\$2.00	\$12.25		\$1.50	\$15.75
338	\$2.00	\$12.25		\$1.50	\$15.75
339	\$2.00	\$11.50	\$1.00	\$1.50	\$16.00
340	\$2.00	\$12.75		\$1.50	\$16.25
341	\$2.00	\$12.75		\$1.50	\$16.25
342	\$2.00	\$13.00		\$1.50	\$16.50
343	\$2.00	\$13.00		\$1.50	\$16.50
344	\$2.00	\$9.25	\$4.00	\$1.50	\$16.75

345	\$2.00	\$13.25		\$1.50	\$16.75
346	\$2.00	\$13.25		\$1.50	\$16.75
347	\$2.00	\$9.50	\$4.00	\$1.50	\$17.00
348	\$2.00	\$13.50		\$1.50	\$17.00
349	\$2.00	\$13.50		\$1.50	\$17.00
350	\$2.00	\$13.50		\$1.50	\$17.00
351	\$2.00	\$11.50	\$2.00	\$1.50	\$17.00
352	\$2.00	\$9.75	\$4.00	\$1.50	\$17.25
353	\$2.00	\$9.75	\$4.00	\$1.50	\$17.25
354	\$2.00	\$13.75		\$1.50	\$17.25
355	\$2.00	\$14.25		\$1.50	\$17.75
356	\$2.00	\$14.25		\$1.50	\$17.75
357	\$2.00	\$14.25		\$1.50	\$17.75
358	\$2.00	\$10.50	\$4.00	\$1.50	\$18.00
359	\$2.00	\$11.50	\$3.00	\$1.50	\$18.00
360	\$2.00	\$12.50	\$2.00	\$1.50	\$18.00
361	\$2.00	\$11.00	\$4.00	\$1.50	\$18.50
362	\$2.00	\$13.00	\$2.00	\$1.50	\$18.50
363	\$2.00	\$14.25	\$1.00	\$1.50	\$18.75
364	\$2.00	\$14.25	\$1.00	\$1.50	\$18.75
365	\$2.00	\$15.25		\$1.50	\$18.75
366	\$2.00	\$15.25		\$1.50	\$18.75
367	\$2.00	\$15.75		\$1.50	\$19.25
368	\$2.00	\$15.75		\$1.50	\$19.25
369	\$2.00	\$15.75		\$1.50	\$19.25
370	\$2.00	\$15.75		\$1.50	\$19.25
371	\$2.00	\$15.75		\$1.50	\$19.25
372	\$2.00	\$12.00	\$4.00	\$1.50	\$19.50
373	\$2.00	\$16.25		\$1.50	\$19.75
374	\$2.00	\$16.25		\$1.50	\$19.75
375	\$2.00	\$12.50	\$4.00	\$1.50	\$20.00
376	\$2.00	\$16.50		\$1.50	\$20.00
377	\$2.00	\$12.50	\$4.00	\$1.50	\$20.00
378	\$2.00	\$16.50		\$1.50	\$20.00
379	\$2.00	\$16.50		\$1.50	\$20.00
380	\$2.00	\$13.50	\$4.00	\$1.50	\$21.00
381	\$2.00	\$17.50		\$1.50	\$21.00
382	\$2.00	\$17.75		\$1.50	\$21.25
383	\$2.00	\$18.50		\$1.50	\$22.00
384	\$2.00	\$18.50		\$1.50	\$22.00
385	\$2.00	\$19.25		\$1.50	\$22.75
386	\$2.00	\$17.25	\$2.00	\$1.50	\$22.75
387	\$2.00	\$19.25		\$1.50	\$22.75
388	\$2.00	\$18.50	\$1.00	\$1.50	\$23.00
389	\$2.00	\$19.50		\$1.50	\$23.00
390	\$2.00	\$15.50	\$4.00	\$1.50	\$23.00
391	\$2.00	\$18.50	\$1.00	\$1.50	\$23.00
392	\$2.00	\$19.75		\$1.50	\$23.25
393	\$2.00	\$19.75		\$1.50	\$23.25
394	\$2.00	\$20.00		\$1.50	\$23.50
395	\$2.00	\$20.25		\$1.50	\$23.75
396	\$2.00	\$21.25		\$1.50	\$24.75
397	\$2.00	\$20.25	\$2.00	\$1.50	\$25.75
398	\$2.00	\$23.25		\$1.50	\$26.75
399	\$2.00	\$19.25	\$4.00	\$1.50	\$26.75
400	\$2.00	\$24.75		\$1.50	\$28.25
401	\$2.00	\$25.25		\$1.50	\$28.75
402	\$2.00	\$25.25		\$1.50	\$28.75
403	\$2.00	\$25.75		\$1.50	\$29.25

404	\$2.00	\$26.75		\$1.50	\$30.25
405	\$2.00	\$26.75		\$1.50	\$30.25
406	\$2.00	\$25.50	\$2.00	\$1.50	\$31.00
407	\$2.00	\$28.25		\$1.50	\$31.75
408	\$2.00	\$30.25		\$1.50	\$33.75
409	\$2.00	\$32.00		\$1.50	\$35.50
410	\$2.00	\$28.50	\$4.00	\$1.50	\$36.00
411	\$2.00	\$32.00	\$1.00	\$1.50	\$36.50
412	\$2.00	\$33.00		\$1.50	\$36.50
413	\$2.00	\$34.00		\$1.50	\$37.50
414	\$2.00	\$32.25	\$2.00	\$1.50	\$37.75
415	\$2.00	\$36.25		\$1.50	\$39.75
416	\$2.00	\$36.25		\$1.50	\$39.75
417	\$2.00	\$36.50		\$1.50	\$40.00
418	\$2.00	\$37.00		\$1.50	\$40.50
419	\$2.00	\$38.25		\$1.50	\$41.75
420	\$2.00	\$39.25		\$1.50	\$42.75
421	\$2.00	\$39.25		\$1.50	\$42.75
422	\$2.00	\$39.50		\$1.50	\$43.00
423	\$2.00	\$40.00		\$1.50	\$43.50
424	\$2.00	\$40.50		\$1.50	\$44.00
425	\$2.00	\$40.50		\$1.50	\$44.00
426	\$2.00	\$41.25		\$1.50	\$44.75
427	\$2.00	\$41.75		\$1.50	\$45.25
428	\$2.00	\$42.25		\$1.50	\$45.75
429	\$2.00	\$42.50		\$1.50	\$46.00
430	\$2.00	\$42.75		\$1.50	\$47.25
431	\$2.00	\$43.75		\$1.50	\$47.25
432	\$2.00	\$46.25		\$1.50	\$49.75
433	\$2.00	\$47.00		\$1.50	\$50.25
434	\$2.00	\$47.50		\$1.50	\$51.00
435	\$2.00	\$48.00		\$1.50	\$51.50
436	\$2.00	\$48.00		\$1.50	\$51.50
437	\$2.00	\$48.25		\$1.50	\$51.75
438	\$2.00	\$48.25		\$1.50	\$51.75
439	\$2.00	\$48.25		\$1.50	\$51.75
440	\$2.00	\$49.25		\$1.50	\$52.75
441	\$2.00	\$49.25		\$1.50	\$52.75
442	\$2.00	\$48.00	\$3.00	\$1.50	\$54.50
443	\$2.00	\$51.00		\$1.50	\$54.50
444	\$2.00	\$52.00		\$1.50	\$55.50
445	\$2.00	\$52.25		\$1.50	\$55.75
446	\$2.00	\$52.25		\$1.50	\$55.75
447	\$2.00	\$53.00		\$1.50	\$56.50
448	\$2.00	\$53.25		\$1.50	\$56.75
449	\$2.00	\$51.50	\$2.00	\$1.50	\$57.00
450	\$2.00	\$53.75		\$1.50	\$57.25
451	\$2.00	\$55.25		\$0.75	\$58.00
452	\$2.00	\$54.50		\$1.50	\$58.00
453	\$2.00	\$55.00		\$1.50	\$58.50
454	\$2.00	\$55.50		\$1.50	\$59.00
455	\$2.00	\$56.75		\$1.50	\$60.25
456	\$2.00	\$56.75		\$1.50	\$60.25
457	\$2.00	\$57.00		\$1.50	\$60.50
458	\$2.00	\$58.00		\$1.50	\$61.50
459	\$2.00	\$58.00		\$1.50	\$61.50
460	\$2.00	\$60.25	\$1.00	\$1.50	\$64.75
461	\$2.00	\$63.00		\$1.50	\$66.50
462	\$2.00	\$64.75		\$1.50	\$68.25

DRAFT

463	\$2.00	\$65.25		\$1.50	\$68.75
464	\$2.00	\$66.00		\$1.50	\$69.50
465	\$2.00	\$66.25		\$1.50	\$69.75
466	\$2.00	\$67.75		\$1.50	\$71.25
467	\$2.00	\$68.00		\$1.50	\$71.50
468	\$2.00	\$68.00		\$1.50	\$71.50
469	\$2.00	\$68.50		\$1.50	\$72.00
470	\$2.00	\$68.50		\$1.50	\$72.00
471	\$2.00	\$68.75		\$1.50	\$72.25
472	\$2.00	\$69.25		\$1.50	\$72.75
473	\$2.00	\$69.75		\$1.50	\$73.25
474	\$2.00	\$70.25		\$1.50	\$73.75
475	\$2.00	\$70.25		\$1.50	\$73.75
476	\$2.00	\$70.75		\$1.50	\$74.25
477	\$2.00	\$71.00		\$1.50	\$74.50
478	\$2.00	\$72.00		\$1.50	\$75.50
479	\$2.00	\$72.00		\$1.50	\$75.50
480	\$2.00	\$72.50		\$1.50	\$76.00
481	\$2.00	\$72.75		\$1.50	\$76.25
482	\$2.00	\$72.75		\$1.50	\$76.25
483	\$2.00	\$73.50		\$1.50	\$77.00
484	\$2.00	\$73.75		\$1.50	\$77.25
485	\$2.00	\$72.75	\$2.00	\$1.50	\$78.25
486	\$2.00	\$74.00	\$2.00	\$1.50	\$79.50
487	\$2.00	\$76.25		\$1.50	\$79.75
488	\$2.00	\$77.00		\$1.50	\$80.50
489	\$2.00	\$77.00		\$1.50	\$80.50
490	\$2.00	\$74.00	\$2.00	\$1.50	\$80.50
491	\$2.00	\$77.25		\$1.50	\$80.75
492	\$2.00	\$77.00		\$1.50	\$80.75
493	\$2.00	\$78.00		\$1.50	\$81.50
494	\$2.00	\$79.25		\$1.50	\$82.75
495	\$2.00	\$79.25		\$1.50	\$82.75
496	\$2.00	\$79.25		\$1.50	\$82.75
497	\$2.00	\$79.25		\$1.50	\$82.75
498	\$2.00	\$79.25		\$1.50	\$82.75
499	\$2.00	\$79.50		\$1.50	\$83.00
500	\$2.00	\$79.75		\$1.50	\$83.25
501	\$2.00	\$80.00		\$1.50	\$83.50
502	\$2.00	\$80.00		\$1.50	\$83.50
503	\$2.00	\$80.00		\$1.50	\$83.50
504	\$2.00	\$80.00		\$1.50	\$83.50
505	\$2.00	\$80.00		\$1.50	\$83.50
506	\$2.00	\$80.25		\$1.50	\$83.75
507	\$2.00	\$80.25		\$1.50	\$83.75
508	\$2.00	\$80.25		\$1.50	\$83.75
509	\$2.00	\$80.50		\$1.50	\$84.00
510	\$2.00	\$80.50		\$1.50	\$84.00
511	\$2.00	\$80.75		\$1.50	\$84.25
512	\$2.00	\$80.75		\$1.50	\$84.25
513	\$2.00	\$80.75		\$1.50	\$84.25
514	\$2.00	\$80.75		\$1.50	\$84.25
515	\$2.00	\$81.00		\$1.50	\$84.50
516	\$2.00	\$81.00		\$1.50	\$84.50
517	\$2.00	\$81.25		\$1.50	\$84.75
518	\$2.00	\$81.50		\$1.50	\$85.00
519	\$2.00	\$81.50		\$1.50	\$85.00
520	\$2.00	\$82.00		\$1.50	\$85.50
521	\$2.00	\$82.25		\$1.50	\$85.75

522	\$2.00	\$82.25		\$1.50	\$85.75
523	\$2.00	\$82.25		\$1.50	\$85.75
524	\$2.00	\$82.50		\$1.50	\$86.00
525	\$2.00	\$82.50		\$1.50	\$86.00
526	\$2.00	\$83.00		\$1.50	\$86.50
527	\$2.00	\$83.25		\$1.50	\$86.75
528	\$2.00	\$83.25		\$1.50	\$86.75
529	\$2.00	\$86.75		\$1.50	\$90.25
530	\$2.00	\$88.00		\$1.50	\$91.50
531	\$2.00	\$88.75		\$1.50	\$92.25
532	\$2.00	\$93.75		\$1.50	\$97.25
533	\$2.00	\$94.25		\$1.50	\$97.75
534	\$2.00	\$144.00		\$1.50	\$147.50
535	\$2.00	\$145.50		\$1.50	\$149.00
536	\$2.00	\$172.75		\$1.50	\$176.25
	\$1,072.00	\$11,670.25	\$197.50	\$614.25	\$13,554.00

DRAFT

**EXHIBIT 6**

**From:** Terry Mercer  
**To:** John Olinger  
**Date:** 5/27/2014 1:07 PM  
**Subject:** Re: FW: Please testify TODAY at senate hearing

Yes. I just found out late Friday heading into a long weekend. I am the one who called Rick Z. I will be there. Hope you and your colleagues can make it too.

Terry

Terrence Mercer  
Associate Administrator  
Division of Public Utilities and Carriers  
89 Jefferson Boulevard  
Warwick, RI 02888  
(401) 780-2150

>>> "John Olinger" <[jolinger@alloccasionlimo.com](mailto:jolinger@alloccasionlimo.com)> 5/27/2014 12:41 PM >>>  
Hi Terry-

I know I owe you an answer on the Orange complaint. Maybe we can discuss that tomorrow or Thursday? I was out of the country for a couple of weeks at the beginning of the month.

More urgently, are you aware of the hearing today?" I just found out today.

Thanks

Best Regards:

John Olinger

President & CEO

All Occasion Transportation

Serving 600 Cities Worldwide

[jolinger@alloccasionlimo.com](mailto:jolinger@alloccasionlimo.com)

[www.alloccasionlimo.com](http://www.alloccasionlimo.com)

800-454-1380

401-312-0945 ext. 110

All Occasion Trans #DDB611F

Official Member Logo- CMYK

From: Rick Szilagyi [mailto:[rick@lexian.com](mailto:rick@lexian.com)]  
Sent: Tuesday, May 27, 2014 11:51 AM  
To: [apluslimo@verizon.net](mailto:apluslimo@verizon.net); [jolinger@alloccasionlimo.com](mailto:jolinger@alloccasionlimo.com);  
[pdamian@arrowprestigelimo.com](mailto:pdamian@arrowprestigelimo.com); [sheron@fivestarlimo.com](mailto:sheron@fivestarlimo.com); 'Chris Maxwell';  
[dan@sentinellimo.com](mailto:dan@sentinellimo.com); 'Rodney Allen'; [eric@starlightlimousine.com](mailto:eric@starlightlimousine.com);  
[BillLegare@ValleyTransCorp.com](mailto:BillLegare@ValleyTransCorp.com); 'David Demick'  
Cc: 'Michael Callahan'; 'David Lathbury'; 'Teale Smith'; 'L.A. Limousine  
Service'; 'Stephen G Crispo'; Laurie Szilagyi  
Subject: Please testify TODAY at senate hearing  
Importance: High

Dear NELA RI members: Sorry about the short notice, I just received a call. Apparently late in the day on Friday. before the long holiday weekend. a senate hearing was posted for today, with the Uber bill being heard around 4:30PM. This bill would EXEMPT A COMPANY FROM THE PRICE FLOOR, IF THE SERVICE REQUEST CAME THROUGH A SOFTWARE APP. This was already heard in the house.

Please do your best to attend to testify today against this Uber favoring bill. AND, be careful. They would like nothing more than for it to be interpreted that the floor should be thrown out all together.

Here is the info..  
<http://status.rilin.state.ri.us/documents/agenda-10455.pdf>

Thanks, Rick

Rick Szilagyi

New England Livery Association

P 866.736.6352

F 866.616.6352

C 603.988.3260

<<mailto:rick@lexian.com>> [rick@lexian.com](mailto:rick@lexian.com)

<<http://www.nelivery.org>> [www.nelivery.org](http://www.nelivery.org)

**EXHIBIT 7**

**From:** "Daus, Matthew" <mdaus@windelsmarx.com>  
**To:** "Terry Mercer" <Terry.Mercer@dpuc.ri.gov>  
**CC:** "Huque, Sarah" <shuque@windelsmarx.com>, "Russo, Pasqualino" <prusso@win...>  
**Date:** 5/6/2014 3:10 PM  
**Subject:** FW: Rhode Island PUC  
**Attachments:** Rhode Island PUC donation letter 5.6.14.pdf

Terry - Here it is. It was a pleasure. Matt

Matthew W. Daus  
Windels Marx Lane & Mittendorf, LLP  
156 West 56th Street, New York, New York 10019  
Direct Dial: 212.237.1106 | General Fax: 212.262.1215  
mdaus@windelsmarx.com | www.windelsmarx.com

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**WINDELS  
MARX** | Windels  
Marx  
Lane &  
Mittendorf, LLP

Matthew W. Daus  
(212) 237-1106  
[mdaus@windelsmarx.com](mailto:mdaus@windelsmarx.com)

156 West 56<sup>th</sup> Street | New York, NY 10019  
T. 212.237.1000 | F. 212.262.1215

May 6, 2014

Terrence Mercer  
Associate Administrator  
State of Rhode Island  
Division of Public Utilities and Carriers  
89 Jefferson Boulevard  
Warwick, RI 02888

Dear Mr. Mercer:

This correspondence will clarify our conversation and agreement that all expert consulting and legal services delivered by myself in my personal capacity, and preparatory research conducted by the firm of Windels Marx, up to and including the date of my testimony before the Rhode Island Division of Public Utilities and Carriers on April 30, 2014, were delivered on a pro bono or volunteer basis.

For your information, the value of such services delivered at no charge to the State of Rhode Island total \$12,172.50, not including travel expenses (which will not be submitted for reimbursement).

We are happy to have donated our time and to being afforded the opportunity to express my views on this important public safety issue for the residents of and visitors to your state. Also, we are gratified and proud that your agency is a member of the International Association of Transportation Regulators, a non-profit educational and advocacy organization for government transportation regulators.

Thank you for your consideration.

Sincerely,



Professor Matthew W. Daus, Esq.

**From:** Terry Mercer  
**To:** Matthew Daus  
**CC:** chetherington@riag.ri.gov  
**Date:** 5/19/2014 8:36 AM  
**Subject:** Re: Revised Rhode Island PUC contract 5.19.14

Thanks, Matt. I'm sure Christy will be in touch about the brief.

>>> "Daus, Matthew" <[mdaus@windelsmarx.com](mailto:mdaus@windelsmarx.com)> 5/19/2014 7:59 AM >>>  
Terry - Attached is the executed revised draft incorporating your comments of May 7th. Please let me know if this is ok or if anything further needs to be done. Thanks - Matt

Matthew W. Daus  
Windels Marx Lane & Mittendorf, LLP  
156 West 56th Street, New York, New York 10019  
Direct Dial: 212.237.1106 | General Fax: 212.262.1215  
[mdaus@windelsmarx.com](mailto:mdaus@windelsmarx.com) | [www.windelsmarx.com](http://www.windelsmarx.com)

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COOPERATIVE AGREEMENT BETWEEN  
THE DIVISION OF PUBLIC UTILITIES  
AND  
MATTHEW W. DAUS  
IN MATTERS BEFORE THE  
DIVISION OF PUBLIC UTILITIES AND CARRIERS  
REGARDING PUBLIC MOTOR VEHICLE RULEMAKING  
DOCKET 13 MC 121

OBJECTIVE

This Agreement covers the review, research and preparation associated with the drafting of subsequent or final written comments and/or testimony on or after the conclusion of the public hearing described herein that was held on April 30, 2014. Any assistance, preparation, filed testimony and live testimony regarding the Public Motor Vehicle ("PMV") industry rulemaking currently pending before the Division of Public Utilities and Carriers ("Division") in Docket number 13 MC 121, leading up to and including the date of said proceeding that may have been provided was performed on a pro bono basis by both Matthew W. Daus in his individual capacity, as well as the firm of Windels Marx Lane & Mittendorf, LLP at no charge to the Division. This agreement will cover any subsequent live or written testimony, comments, reports, as well as any related legislative proceedings that may arise during the 2014 General Assembly session or thereafter relating to the instant proceeding and/or general scope of work. Specifically, Docket 13 MC 121 is a very narrowly defined rulemaking proceeding designed to establish a reasonable "minimum allowable charge" for PMV service as mandated by R.I.G.L. § 39-14.1-1(7).

The Division is desirous of assistance of a recognized transportation regulatory expert familiar with the regulatory notion of minimum required charges ("price floors") for passenger transportation services in numerous jurisdictions around the nation. The expert engaged through this Agreement is the former Chairman of the New York City Taxi and Limousine Commission and the current President of the International Association of Transportation Regulators and he has testified in other jurisdictions regarding the same issue at hand in Docket 13 MC 112. Said regulatory and transportation industry expert would provide the assistance described above including the provision of testimony and recommendations pertaining to existing policies and legislation concerning minimum fares and price floors and the associated impacts on the public, taxicab and limo/sedan industries. Recommendations may pertain to accepted national regulatory practices, model regulations and legislative changes.

In addition to the above-described scope and terms, the Division and the engaged regulatory expert shall also adhere to the following requirements mandated by the State of Rhode Island.

Consideration

- 1) The Division shall compensate the Expert for services rendered hereunder in an amount not to exceed \$10,000, at an hourly rate of \$425 for work performed on or after the date

of full execution of this agreement by all parties, and no later than June 30, 2014. Expert hereby certifies that these hourly rates are not higher than the rates regularly charged by the expert to preferred public clients. Also included in the not-to-exceed amount are reasonable out-of-pocket expenses, including travel, incurred by the expert in performing services under this contract.

- 2) The Expert may invoice the Division monthly for services rendered hereunder.

#### Other Items

##### Termination

This agreement shall remain in effect until completion of the docket or until the amount due expert for services rendered hereunder is equal to \$10,000 (or any amended authorized amount) whichever shall first occur. Either party may terminate this contract at any time for any reason or no reason. Written notice will be given by the party so terminating. In that event, all property, finished or incomplete documents, data studies and reports shall, at the option of the Division, become its property. If the contract is terminated by the Division as provided herein, the expert will be paid for services rendered through the date of termination. Payment upon such termination shall be accepted by the expert in full satisfaction of all claims and demands against the Division based upon or arising out of the performance of this Agreement.

##### Non-Discrimination

The expert will not discriminate against anyone employed in the performance of this contract, or against any applicant for employment in the performance of this contract because of race, creed, color, gender, or national origin. The expert will take affirmative action to ensure that applicants are employed without regard to their race, creed, color, gender, or national origin. This requirement shall apply to, but not be limited to the following: employment, promotion, demotion, transfer, recruitment, recruitment advertising, layoff or termination, rate of pay or other forms of compensation, and selection for training, including apprenticeship.

##### Conflict of Interest

The expert covenants that he presently has no interest, direct or indirect, which would conflict in any manner or degree with the performance of services required to be performed under this Agreement.

##### Employment Certification

The expert certifies that he/she is not an employee of the State of Rhode Island. The Division and the expert certify that the relationship of employer and employee does not exist. The expert further certifies that the State of Rhode Island is being charged no more than any other government account.

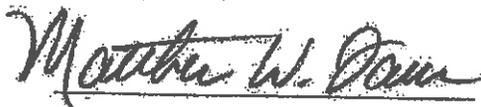
State Approval

This agreement will not be binding on the state or any agency thereof unless approved by the Department of Administration or made under general regulations which the Chief Purchasing Officer may prescribe.

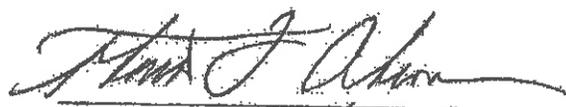
IN WITNESS WHEREOF, THE PARTIES WILL CAUSE THIS CONTRACT TO BE EXECUTED BY THEIR DULY AUTHORIZED REPRESENTATIVES.

EXPERT  
PROF. MATTHEW W. DAUS  
42 86<sup>th</sup> Street  
Brooklyn, NY 11209

DIVISION OF PUBLIC UTILITIES  
AND CARRIERS



Date: May 19, 2014



5-19-14



# Purchase Order

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
ONE CAPITOL HILL  
PROVIDENCE RI 02908

MATTHEW W DAUS  
42 86TH ST  
BROOKLYN, NY 11209  
UNITED STATES

Purchase Order Number  
**3378175**  
Reference Contract Number

S H I P T O	PUC ADMINISTRATIVE SERVICES 89 JEFFERSON BOULEVARD WARWICK, RI 02888 UNITED STATES		PO Date: 22-MAY-14 Buyer: * AUTOCREATE Shipping: PAID Terms: NET 30 Vendor #: 45638		I N V O I C E	DOA CONTROLLER ONE CAPITOL HILL, 4TH FLOOR SMITH ST PROVIDENCE, RI 02908 UNITED STATES									
	<table border="1"> <thead> <tr> <th colspan="2">Department</th> <th>Type of Requisition</th> <th>Requisition Number</th> <th>Bid Number</th> </tr> </thead> <tbody> <tr> <td colspan="2">PUC ADMINISTRATIVE SERVICES</td> <td>DELEGATED AUTHORITY</td> <td>1369472</td> <td></td> </tr> </tbody> </table>					Department		Type of Requisition	Requisition Number	Bid Number	PUC ADMINISTRATIVE SERVICES		DELEGATED AUTHORITY	1369472	
Department		Type of Requisition	Requisition Number	Bid Number											
PUC ADMINISTRATIVE SERVICES		DELEGATED AUTHORITY	1369472												
Line	Code	Description	Quantity	Unit	Unit Price	Total									
1	962.58	COOPERATIVE AGREEMENT FOR PROFESSIONAL EXPERT SERVICES BETWEEN THE DPUC AND MATTHEW W. DAUS IN MATTERS BEFORE THE DPUC REGARDING PUBLIC MOTOR VEHICLE RULEMAKING D13 MC 121/ 05/01/14-06/30/14	1	Each	10000	10,000.00									
Total:					10,000.00										

STATE PURCHASING AGENT
Lorraine A. Hynes

This Notice of Award/Purchase Order is issued in accordance with the specific requirements described herein and the State's Purchasing Regulations and General Conditions of Purchase, copies of which are available at [www.purchasing.ri.gov](http://www.purchasing.ri.gov). Delivery of goods or services as described herein shall be deemed acceptance of these requirements

**EXHIBIT 8**

From the San Francisco Business Times

:<http://www.bizjournals.com/sanfrancisco/blog/2013/09/regulators-rep-slams-ubers.html>

Sep 25, 2013, 2:58pm PDT Updated: Sep 25, 2013, 3:36pm PDT

## Regulators' rep slams Uber's confrontational style



Patrick Hoge

Reporter- *San Francisco Business Times*

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The president of the International Association of Transportation Regulators hotly reacted Wednesday to an **Uber Technologies** blog suggesting his group was colluding with industry players by drafting sweeping new model regulations for smartphone apps.

"It's just childish and it's unprofessional behavior. It's nothing short of defamatory," said Matthew Daus, an attorney who leads the transportation practice at Windels Marx Lane & Mittendorf, a New York City law firm. "It's very unfortunate they've sunk to this level."

Uber posted a scathing blog Tuesday evening about a package of model smartphone app regulations the IATR released Sept. 23 as a reference for use by government agencies in drafting local rules.

The document includes provisions that could be used to require hourly, flat-fee or zone pricing for limousines or sedan service, as opposed to basing fees on time and/or distance; require that requests for limos be made in advance; mandate app companies have 24-hour phone lines for requesting car dispatches and other customer service; and even set minimum fares for limousines that are higher than for taxicabs.

Daus insisted the document is a "menu" of options that local governments can choose from as they see fit.

On certain matters, the IATR has taken a stronger position, such as the need for insurance requirements and for dispatching apps like Uber to be liable for limo activities. Daus also said the IATR opposes unregulated surge pricing — charging more during periods of high demand - which is something Uber does.

Uber spokesman Andrew Noyes responded Wednesday saying that surge pricing helps to guarantee its system is reliable as it attracts more drivers at times of high demand. Measures like minimum fares for limos, he said, protect the taxi industry, "pure and simple."

Blog author Corey Owens, Uber's head of policy, wrote Tuesday that the IATR document represented "a tried-and-true model of anti-competitive and collusive policymaking," and he alleged that taxi and limousine regulators have historically been beholden to the industries they regulate.

Daus, a former New York City taxi commissioner who is a professor at the Transportation Research Center at City College in New York, said such a claim about the IATR was "ludicrous," and that all the work he has done for the group has been pro bono.

The IATR's goal is to protect public safety and prevent consumers from getting fleeced, he said. Use of GPS technology in smartphones to calculate fares, for example, has not been sanctioned by the National Institute of Standards and Technology or the National Conference on Weights and Measures, he said.

Daus said Uber was invited to make comments on the proposed model regulations, but did not do so.

He expressed surprise that Owens had approached him at the IATR convention in St. Louis this week expressing a desire to get beyond "rhetoric."

"They disgust me, the way that they act. How could they say this stuff seriously? If they say it again, we're going to be getting lawyers," he said.

Daus declined to identify any of his law firm's transportation industry clients, but the IATR report refers to expert testimony he gave in a court case for Nashville when the city was defending its \$45 minimum fare rule for limo/sedan services. Daus said he did not express an opinion about such rules, but found that they are not an oddity.

Patrick Hoge covers technology for the San Francisco Business Times.