



Preliminary Findings
Taxi Driver Labor Market Study:
Long Hours, Low Wages
January 2012

City of Portland Revenue Bureau
Office of Management and Finance

Executive Summary

- The calculated average net hourly income of all Portland taxi drivers is \$6.22. These low hourly wages are consistent with those found in recent studies in other U.S. cities.
- Drivers at non-driver owned companies typically work long hours—often 12-14 hours per day, 6-7 days per week—to be able to meet the required company payments, expenses, and provide income for their families.
- Taxi drivers work as independent contractors. Low wages are not supplemented with health care or retirement benefits, paid vacation or sick leave.
- Large weekly payments from the driver to the company (the “kitty”) are a major factor in the low net income and long working hours of the professional taxi driver.
- There are no caps on the number of taxi drivers who may be permitted, thus creating a steady and unlimited pool of potential drivers, particularly in times of high unemployment.
- In contrast, the City permitting system limits the number of taxi vehicle permits and has reissued permits to the same companies for many years, with relatively few performance requirements.
- The oversupply of drivers relative to the limited number of tightly-held taxi permits creates artificially poor market conditions for drivers, with too few incentives for companies to provide adequate services at reasonable costs to drivers.
- Portland regulates taxi fares and the number of permits, but does not regulate the services the taxi companies provide to the drivers in return for the “kitty” payment. Current regulations are not sufficient to promote sustainable working conditions for drivers.
- Driver income at Portland’s one driver-owned taxi company is significantly higher than the average driver income at the non-driver-owned companies for all categories of drivers.
- The average weekly “kitty” payment for full-time drivers at non-driver owned companies is \$500 per week compared to a high of \$245 per week in the current fiscal year for the one driver-owned company.
- Lower kitty payments at the driver-owned company contribute to a fair wage and shorter working hours: an average 8 hour shift, 5.5 days per week.
- Long hours and low wages for taxi drivers are associated with poor customer service, unsafe driving, increased accidents, negative impacts to driver health and family life, as well as increased costs to the community.
- The three smaller Portland taxi companies have been unable to obtain sufficient taxi vehicle permits to adequately meet Code requirements for citywide service.

- Fewer vehicle permits available to these smaller companies makes it more difficult for them to finance technological improvements or lower the amount of driver “kitty” payments.
- The evolution of business models across the U.S and elsewhere is causing many jurisdictions to recognize a need for adjustments to taxi permitting systems, and to add regulations regarding taxi company performance and the driver-company relationship.
- Skillful company management and support to drivers plays a significant role in driver working conditions and profits, regardless of company size or ownership. Experience has shown that there is no “one size fits all” model for taxi permitting and regulation.
- Currently permitted drivers and companies alike deserve fair opportunities to meet the goals of safe, efficient and sustainable taxi service.
- The permit renewal and issuance process should evaluate taxi company performance related to driver working conditions and to the quantity and quality of services supplied to the driver.
- To balance current conditions, the Regulatory Division and the Private For-Hire Transportation Board should consider additional regulations designed to promote sustainable working conditions and fair wages for drivers.

Taxi Driver Labor Market Study

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Background and Methodology

In May of 2011, a group representing 50 City of Portland taxi drivers forwarded a request for new taxi permits to the Regulatory Division. The Solidarity Cab Cooperative d/b/a Union Cab requested a company permit and 50 vehicle permits for a new, driver-owned taxi company. The request was also forwarded to the office of Mayor Sam Adams.

The Union Cab applicants cited poor economic and working conditions in their request to permit the new, driver-owned taxi company. They asked that the Revenue Bureau and the Private For-Hire Transportation Board consider issuing permits to their driver-owned cooperative in order that they might continue their work as taxi drivers under a more sustainable business model.

At the request of the Mayor, the Regulatory Division undertook a preliminary review of the current economic and working conditions for taxi drivers. The system used for granting taxi permits is a key factor affecting these working and economic conditions.

We requested and reviewed financial and operating data from the six Portland taxi companies. This data included financial statements and information regarding the calculation of the driver "kitty" payment amount. This data was supplemented with data available in our Business License Tax database, as well as the related copies of City and federal tax returns.

After review of the company submissions, we requested supplementary information, such as company-driver contracts, and met with company owners and managers to discuss the details of operations and finance. We also discussed the history of Portland taxi regulation, caps on the number of permits, and the working and business relationship between company owners/managers and drivers.

We reviewed City of Portland Business License tax-exemption and tax-return data for a representative sampling of taxi drivers, as well as the related City and federal income tax returns.

Regulatory Division staff conducted informal interviews and discussions with approximately 250 (out of approximately 900 currently working drivers). We met with groups of interested drivers and discussed their compensation, their working hours and conditions, and their ability to obtain health insurance and retirement benefits. Information gathered from drivers during permit renewal and vehicle inspections was included in our findings.

We compared the data and the information we received from company owners, managers, and drivers with the information reported in similar studies conducted in Austin, Texas; Chicago, Illinois; Denver, Colorado; Los Angeles, California; and Toronto, Canada. We also reviewed reports from the International Association of Transportation Regulators (IATR), the Taxi, Limousine, and Paratransit Association (TLPA); as well as additional recent reports relating to taxi driver working conditions and taxi permit systems.

Taxi Driver Labor Market Study

Part 1: Taxi Permitting Systems

In the U.S. and worldwide, taxi permits are issued by various jurisdictions (municipal, county, state, territorial, or national). The City of Portland regulates taxi companies, vehicles and drivers to promote safe, convenient, and adequate taxi service.

The Revenue Bureau Regulatory Division conducts driver background checks and driver testing, monitors for adequate vehicle maintenance and insurance, checks for compliance with various operating and safety regulations, investigates complaints, and is responsible for the enforcement of Code violations.

As do many U.S. cities of the same size or larger, Portland restricts the overall number of taxi company and vehicle permits issued. The reasons often cited for caps on taxi permits include:

- Caps on permits help promote a relatively stable taxi industry: Cities rely upon taxi service for transport from the airport for business and vacation travelers. Taxi service also provides transport to doctor's appointments, pharmacies and other necessary transport for the elderly, the ill, and others who may not be able to utilize other methods of public transportation. Deregulation in some jurisdictions led to destabilization of the taxi service.
- Limit congestion and pollution: In some cities, there has been concern that large numbers of cruising taxis created undesirable and unmanageable traffic congestion and vehicle pollution.
- Stabilize driver income: Limits on the number of taxi permits have also been thought to help maintain a stable level of income for permitted drivers by avoiding oversupply of taxis.

Limits on taxi vehicle permits are thought to benefit taxi drivers and customers alike. These considerations must be balanced with the desire to ensure that taxis are available and reasonably prompt in response to customer calls for service and the need to allow for industry growth and innovation.

Many jurisdictions have begun to grapple with the unintended consequences and unique problems created by the limits set on taxi numbers. Stagnant limits on vehicle permit numbers leaves some market segments underserved. Typical areas where there is insufficient service include wheelchair accessible vehicles, late night and peak hour service. Stagnant permit caps also prevent smaller companies from growing their businesses, and may contribute to the migration of business from the taxi sector to other, less regulated vehicle types.

Because taxi permit caps limit the number of available vehicles, but not the pool of drivers, stagnant permit caps may also inadvertently help create an imbalance in the relationship between companies and drivers. Total deregulation of permit numbers, however, can have negative impacts on company stability, driver income, and customer service.

There is no uniform method for determining the proper number of taxi vehicles, although it is typical to review several accepted measures of demand when measuring increases in demand. The Regulatory Division currently considers business and population growth, number of airport trips, and housing development when considering demand for taxis. Demand increases during peak hours and during hours when fewer taxi drivers are working (late night). Specialty needs, such as wheelchair accessible vehicles, service more distant from downtown, and late night service should be taken into consideration when setting the number of available taxi permits.

Taxi permitting systems can be divided into three main types:

1. Medallion systems: taxi permit is sold to the company or driver, and often is resold or released by the owner;
2. Non-medallion systems: the regulatory body retains ownership and leases the permit directly to the company or driver; or
3. Hybrid systems that include both medallions and leased permits.

In medallion systems, the driver or company owner of the medallion is eligible to buy and sell the permit to others, often through a highly regulated process. The owner may also lease the permit to drivers. The medallion system thus allows the purchaser to obtain a return on the initial investment. In medallion systems, the equity that accumulates in the permit is often considered an investment towards retirement for the driver.

Jurisdictions that retain ownership of taxi permits (non-medallion systems) have different methods for managing the distribution of the permits. Some lease the permit directly to the driver so long as the driver affiliates with an approved association or permitted company (Seattle). Some cities use a combination system to issue some permits to companies and some permits directly to drivers (San Francisco). And, as mentioned above, some cities have a hybrid system that includes both medallions and leased permits.

Part 2: Portland Taxi Companies

Portland has a non-medallion system and the City retains ownership of company and vehicle permits. Portland City Code prohibits the sale, lease or any other assignment of company or vehicle permits. A cap at the current limit of 382 taxi vehicle permits has been in effect since 1998, and, although the City retains ownership of the permits, the same number of permits has been assigned to each of the current companies since that time.

Portland taxi companies may charge a weekly, monthly or daily fee to drivers (the “kitty”), but, per City Code, this fee must be charged in exchange for services offered, not for the use of the permit itself. Company and vehicle permits are renewable on an annual basis. Renewal requires adequate insurance, vehicle inspection, and payment of permit fees.

Currently, company and vehicle permits are assigned to six* companies: Broadway, Green, New Rose City, Portland, Radio, and Sassy’s. The breakdown of taxi vehicle permits is as follows:

Table 1: Taxi Vehicle Permits by Company

Company	Permitted Taxi Vehicles	Percent of Permitted Vehicles
Broadway	136	35.6%
Green	48	12.6%
New Rose City	19	5.0%
Portland	26	6.8%
Radio	136	35.6%
Sassy’s	17	4.5%
Total	382	100.1%

Note: Percent total does not sum to 100% due to rounding.

*Broadway and Sassy’s have been combined into one company for the purposes of the analysis in this study, as they are within the same ownership group.

Additional vehicle permit types operated by each company include:

Broadway/Sassy’s Approximately 65 Specially Assisted Transportation (SAT) vehicles
 Green 9 Shuttle vehicles

Radio and Broadway are significantly larger than the other three companies. These two companies were able to expand their business, and the number of permits assigned to them, prior to the current system of permit caps. In addition, both Broadway and Radio operate a significant number of taxis outside the City of Portland, but within the Portland metropolitan area (metro taxis). These taxis are not currently issued City of Portland permits. Drivers using metro taxis are prohibited from picking up passengers within Portland city limits, but they may drop off passengers within Portland.

Green and Sassy’s first received Portland permits in 1998, but the other companies each have longer histories of operation in Portland, although in some cases the ownership has changed. Several of the existing companies were denied additional permits in 1998 under the criteria in place at that time.

Broadway has 136 permits. Sassy’s was first issued 17 permits in 1998 and Broadway owners were subsequently granted permission to purchase Sassy’s. The Broadway/Sassy’s group has the largest total

number of Portland City taxi permits, 153, as well as approximately 65 specially assisted transportation (SAT) vehicle permits. (The number of SAT vehicle permits is not currently capped and the number granted to Broadway/Sassy's fluctuates slightly as vehicles are added or taken out of service.)

Radio Cab holds the second-largest number of taxi permits, 136. Although it is a for-profit corporation, Radio drivers founded the company and have been shareholders since its inception in 1946. Approximately half of the Radio drivers are "owner-operators". The operating model and structure of driver payments to the company is significantly different at Radio Cab from all other currently permitted companies.

Green holds the next highest number of taxi permits, with 48 vehicles. Green was originally permitted as Smart Cab in 1998, to promote more innovative and varied taxi service in Portland, as well as increased opportunities for drivers.

Portland Taxi has also been operating for a number of years with a small number of permits—26—with some ownership changes in recent years.

New Rose City has been operating for 38 years. They started with 11 permits in 1974 and were granted 8 additional permits through 1996. The company has continued to operate with the smallest number of vehicle permits—19.

Portland City Code requires the following of all taxi companies:

- A dispatch system in operation 24 hours a day, providing "reasonably prompt" service;
- Acceptance of any request for service within the City;
- City-wide service 24 hours a day, 7 days a week;
- Less than 65 % of company's vehicles within a mile of the airport at any given time;
- A minimum fleet of 15 taxis;
- At least 2/3 of the fleet utilized and in service at all times.

There have been no increases in total taxi permits issued since 1998, and limited increases prior to that. It is difficult, if not impossible, for the smaller companies to meet the City Code requirement for 24 hour, citywide service with only 19, 26, or even 48 vehicles. This was recognized by the City Council in 2000, and has been discussed by the Private For-Hire (PFHT) Transportation Board several times since.

Portland City Code changes ratified in 2009 added a more accessible process for existing companies to request additional permits from the Board, but no taxi company has been granted additional permits under the new process.

The economic slowdown and lack of consistent indicators for increased demand have contributed to the PFHT Board's reluctance to approve additional permits, even for the smaller companies. At issue is the possibility of potentially decreasing the income of current drivers and companies by further diluting the available taxi fares amongst additional taxis.

Although traditional indicators have shown flat or decreased demand in recent years, resulting in no increase in taxi permits, there are pockets of unfilled demand for taxis. Underserved areas include wheelchair accessible taxi vehicles, late night and other peak demand service, and areas of the city farther out from downtown. Executive sedans and shuttles have filled in some of these gaps in service.

An inability to provide citywide service is not the only limitation caused by the size of the smaller companies. The payment from each taxi driver to the taxi company (the “kitty”) is a major source of income for each of the companies.

For the sake of potential revenue comparison only, we can utilize an average \$500 per week per taxi vehicle permit issued in company revenue through driver payments. These are not actual numbers, but are used only to point out the differences in potential revenue related to the number of permits available to each company. It is important to note that in some cases, the revenue per permit may be less, especially where there is a lower “kitty” at the driver-owned company. In many cases, the kitty revenue will be more than this average figure, because more than one driver pays the company for a weekly shift on each vehicle and permit. Use of an average number protects the confidentiality of company financial information, and makes for a cleaner comparison and analysis of the revenue generating potential of the City issued vehicle permits.

Table 2: Average “kitty” income per company

Company	# of Vehicle Permits Issued	Average potential yearly kitty/vehicle	Average “kitty” collected per year from drivers calculated at \$500/week/vehicle permit
Broadway/Sassy’s	153	\$26,000	\$3,978,000
Green	48	\$26,000	\$1,248,000
New Rose City	19	\$26,000	\$494,000
Portland Taxi	26	\$26,000	\$676,000
Radio	136	\$26,000	\$3,536,000

As Table 2, above, illustrates, there is a large disparity between the “kitty” income available to the smallest company, as compared to the largest company. Several smaller companies have served their clientele for many years without access to additional permits. Several of these smaller companies have also introduced moderate innovations and healthy competition to the Portland market, despite the lesser “kitty” revenue available to them.

All three smaller Portland companies are without automated dispatch systems, GPS driver tracking systems, and electronic credit card processing. These companies actively seek better services and equipment as less cost intensive options for smaller companies become available. Several of the smaller companies invest significant funds to improve business for their drivers—web advertising is an example—but, as time goes by without an ability to expand, it becomes increasingly difficult for these companies to keep up with technological advances and compete with the holders of larger numbers of permits.

The inability of these smaller companies to generate sufficient capital to add equipment upgrades is a serious concern. Municipalities have begun to require automated dispatch, GPS tracking, electronic credit card processing, mandatory customer receipt printing, and mandatory electronic reporting. These features add important public safety and consumer protections. Stagnant limits on the growth of permit numbers for the smaller companies has meant that it has been very difficult for them to generate the necessary revenue to incrementally add these service and safety improvements, much as they might want to do so.

As noted above, under Company Requirements, all permitted Portland taxi companies are required by City Code to maintain 24 hour a day, 7 days a week dispatch and service to the entire City. Customers may not be refused except for very special circumstances, and customers should not wait an “unreasonable” amount of time for response to a call for service. These minimum requirements are difficult, if not impossible, to meet currently with a fleet of 19, 23 or even 48 taxis in current-day Portland. It can also be difficult for these companies to meet actual demands for service, which damages their reputation.

The proportionally smaller amounts available to Green, Portland and New Rose City make it much more difficult to keep up with the technological advances expected by customers and regulators alike. It is also difficult to impossible for these companies to reduce the weekly “kitty” paid by drivers, even when there is a recognized slowdown in fares available to the driver.

The Colorado Public Utilities Commission noted in 2008 that the Denver experience suggests that there may be an “optimal size of operation that can . . . sustain profitable operations” and that it is up to the regulatory structure to take this into account when working to maximize market efficiency (Colorado Public Utilities Commission, p. 23). In San Antonio, the necessity for taxi companies to obtain a critical mass of permits and sufficient working capital in order to maintain safety standards and good customer service (Mundy, San Antonio Report, p. 53-54, 71).

In summary, a certain critical mass of vehicle permits is required for a company to adequately meet City Code requirements, provide innovation and efficient customer service, and provide sustainable income for drivers. It is likely that all three of the smaller Portland taxi companies have not yet reached that critical number of permits.

Part 3: Taxi Driver Economic Conditions

Changes in the taxi industry in most U.S. cities during the 1970s and 1980s led to a change in employment classification of taxi drivers. The relationship between companies and drivers shifted, and those drivers who had previously been employees of the company became “independent contractors”. In Portland, Radio was the last company to make that shift, approximately 10 years ago.

The shift from employees to independent contractors removed benefits such as health insurance and vacation for many drivers, but also gave them more independence to set their own schedule and, potentially, to develop more of a personal repeat customer base.

Prior to the shift to an independent contractor driver, many companies used a system whereby some portion of the driver’s daily income was paid to the company in return for services provided. That system of splitting the daily receipts to cover the services provided by the company has evolved into a system of flat payments from driver to company (per shift, per week, or per month). In Portland, this payment, most often made weekly, is referred to as the “kitty”.

The amount the driver pays to the company is not relative to the amount of income the driver receives from fares, but is set at a fixed rate by contract for a set number of shifts. This becomes more problematic for the driver during times of decreased economic activity, when the amount of business per shift may decrease. This is particularly true for those drivers who are more heavily dependent upon airport or tourist fares.

Dispatching, insurance, equipment/vehicle rental and maintenance, charge/credit card processing, and advertising are some of the services historically provided by taxi companies to the drivers. Many of these services are still considered core company services throughout the industry, but some companies continue to shift service costs or responsibilities to the drivers.

To survey the current economics of driving a taxi in Portland, we compiled data from the Revenue Bureau Business License tax database and the Regulatory Division taxi driver database. Calculations were made to find the mean/median income for drivers. Data was extracted from the Revenue Bureau Business License tax database for exempt and non-exempt accounts. Federal income tax returns were examined for many of the accounts.

The data was normalized for obvious material errors. The drivers who have not filed a return with us since January 1, 2009 were removed from the analysis. The data does not include presumptive fee payers (those who did not file and are billed based upon a presumption of a certain income amount).

We only considered drivers with a gross income of at least \$9,000 in any analysis in order to remove from consideration the data for part-time drivers and drivers who only worked for a portion of a tax year. For many of our comparisons between gross yearly income and net yearly income, and for comparisons between companies, we utilized only the more detailed data available for non-exempt drivers (those drivers who file detailed returns because they make more than \$50,000 per year annual gross income). When we include drivers who report less than \$50,000 per year gross income (a majority of drivers), the hourly and yearly wage figures are substantially lower. This difference should be held in mind when reviewing the income chart comparisons below.

In order to obtain results most relevant to more long-term, full time drivers, we included only drivers who had filed a return or exemption request for at least three consecutive years (2008, 2009 and 2010). We reviewed

the tax return for the 2009 federal tax returns on these accounts to ensure that the 2009 drivers were working for the full year.

Our analysis is an estimate based upon information available to us, as well as some assumptions about the information we compiled. We ascribe a high degree of reliability to information we receive as an income tax agency. This information is confidentially submitted and generally supported by federal and state income tax filings.

We also reviewed recent studies of taxi driver earnings in comparable municipalities, and those studies confirmed our findings and conclusions for Portland drivers.

Available Financial Data

Drivers who earn less than \$50,000 per year gross income are exempt from filing City/County tax returns. Our initial comparisons of the relationship between gross and net income for full time drivers were based upon the data for non-exempt drivers only. We examined the returns of these drivers in order to understand the relationship between gross income and net income figures.

Notable findings for all non-exempt (greater than \$50,000 gross annual income) drivers included in the analysis:

Net Income	Gross Income
\$17,600 = median	\$54,400 = median
\$19,200 = mean	\$60,800 = mean

Sizeable fixed driver expenses account for the difference between gross and net income:

Table 3: Typical Income Statement of a Self-employed Taxi Driver

Category	Amount
Revenue/Sales	\$43,000
Expenses:	
Vehicle Expenses ("Kitty" payments, repairs, insurance)	\$16,000
Fuel	\$9,000
Miscellaneous (Airport fees, driver permit fee)	\$1,000
Total Expenses	\$26,000
Net Income	\$17,000
Minus one half self-employment tax	\$1,200
Adjusted Net Income	\$15,800

Discussion of the Income Data

Businesses that are cash-intensive tend to be more prone to the underreporting of income to the IRS. Self-employed taxi drivers are generally considered to be cash-intensive businesses in the eyes of the IRS. Although there is no evidence that the City or federal tax returns examined by the Revenue Bureau were understating income, based upon our research, an "underreporting rate" of 15% is a reasonable high-end estimate for cash-intensive businesses.

The table below shows the average yearly wage drivers when the figures are corrected for potential 15% underreporting:

Table 4: Comparisons of Average Yearly Wage Driver-owned and Non-driver-owned companies For Non-Exempt Drivers, Adjusted Upward 15%

Wage Frequency	Driver-owned company	Non-driver-owned
Annual	\$29,454	\$17,580
Hourly	\$14.16	\$8.45

Even after adding in an additional 15% to taxi driver income as an estimated "undeclared taxable income" amount, the net income remains low. In addition, as independent contractors, drivers must pay the employer portion of social security. This effectively lowers their income to offset much of the gain they might have if underreporting is taking place.

The figures above do not include full-time drivers who are exempt from filing a tax return because they report less than \$50,000 gross income per year. Drivers who report less than \$50,000 gross income per year make up a significant portion of the total drivers: there were twice as many of these exempt drivers as there were drivers who reported \$50,000 or more gross income.

When these exempt drivers are included in the analysis, the calculated average hourly income of drivers at the driver-owned company drops from \$12.31/hour to \$7.95/hour. The approximate average hourly income of all drivers at the non-driver-owned companies drops from \$7.35/hour to \$5.39/hour. Drivers at the driver-owned company fare better in all categories.

Table 5: Portland Taxi Drivers – Average Hourly Income

	Exempt Drivers	Non-Exempt Drivers
Non-Driver Owned Company	\$5.39	\$7.35
Driver Owned Company	\$7.95	\$12.31

As shown in Table 5, above, when the drivers who are exempt from filing a City/County tax return are included in the calculation, the figures change dramatically. When all drivers are included, the resulting average hourly income of all drivers (exempt and non-exempt) at all companies is reduced to \$6.22 per hour.

Wage Comparisons

The factors discussed above, such as possible underreporting of income, allowance for social security withholding, and unknown actual income figures for exempt drivers are difficult to quantify. The actual data available for the non-exempt (> \$50,000 reported gross annual income) drivers is the most reliable. For the purpose of a simple, reliable analysis, we base some comparisons below on that data alone, but, when all drivers are included, actual income figures adjust downward.

Table 6, below illustrates the comparison between non-exempt driver income at driver-owned and non-driver owned companies as compared to the 2011 Oregon minimum wage of \$8.50/hour and the 2011 City of Portland Fair Wage (used for contracting purposes) of \$9.61/hour:

Table 6: Comparisons of Hourly Wage With Oregon Minimum Wage and Portland Fair Wage Non- Exempt Drivers Only (reporting greater than \$50,000 net income per year)

	Hourly Wage
Average Hourly Wage at Driver-Owned Taxi Company	\$12.31
2011 City of Portland Fair Wage	\$9.61
Oregon Minimum Wage	\$8.50
Average Hourly Wage at Non-Driver-Owned Taxi Company	\$7.35

These figures are slightly higher than the earnings self-reported in recent studies that were conducted in Austin, Texas; Chicago, Illinois; and Denver, Colorado. They are comparable to wages reported in Los Angeles, California.

Table 7, below, provides the same comparison when the exempt drivers are included:

Table 7: Comparisons of Hourly Wage For All Drivers, Exempt and Non-Exempt, With Oregon Minimum Wage and Portland Fair Wage

	Hourly Wage
2011 City of Portland Fair Wage	\$9.61
Oregon Minimum Wage	\$8.50
Average Hourly Wage of Portland Taxi Drivers	\$6.22

These very low figures for net income and are consistent with those reported in studies of taxi driver income in Austin, Texas (LAMP, 2010, p. 21-24); Chicago, Illinois (Bruno, 2009, p. 7-8, 13-14); Los Angeles, California (Blasi and Leavitt, 2008, p. 5, 26), and Toronto, Canada (Abraham, Sundar and Whitmore, January 2008, p 14-17).

Variations at the Driver-Owned Company

There is a substantial disparity in net income when comparing drivers at the one driver-owned company, Radio, with drivers in non-driver-owned companies. The average net income of the non-exempt drivers at the driver-owned company was \$25,612, which converts to an approximate hourly “wage” of \$12.31/hour. The average net income of the non-exempt drivers at the non-driver-owned companies was \$15,287, which converts to an approximate hourly “wage” of \$7.35/hour.

Table 8: Comparisons of Average Yearly Wage (Non-Exempt Drivers) Driver-owned and Non-driver-owned companies:

	Driver-owned company	Non-driver-owned
Yearly Wage	\$25,612	\$15,287
Hourly Wage	\$12.31	\$7.35

The average weekly “kitty” payment from a full-time driver to the non-driver-owned companies averages roughly \$500 per week, and this payment does not deviate substantially between various non-driver-owned companies. The average weekly payment for the driver-owned company fluctuates based on the needs of the company, but its highest weekly amount in the most recent fiscal year was \$245, approximately half that of the non-driver-owned companies.

The Radio owner-operators thus take part in ongoing profit sharing throughout the year, and are also able to receive a return on their investment when they leave the company. Although it is a for-profit company, Radio operates as a cooperative, providing services and profit sharing to owner-drivers at or below actual cost.

The higher kitty payments charged by non-driver-owned cab companies represents approximately \$13,000 per year and approximately \$6 per hour. This difference can account for substantially all of the net income difference between drivers at the two types of companies.

Sufficient investment in promotion and advertising is another factor that can strongly impact a driver's success in the market. Radio budgets significant expenditures for full time advertising staff, media and other promotions.

The “Kitty” and Other Payments from Driver to Company

“Kitty” payments are understood to represent payment for services provided: dispatch, insurance coverage, account and credit card payment processing, advertising, and vehicle equipment. Portland City Code clearly states that the payments made by drivers to Private For-Hire Transportation companies must not be payments in exchange for the use of the City permit itself:

16.40.240 A. Transfer of Decal, Permit or Taxiplate Interest Prohibited. All permits, decals and taxiplates issued by the City under the terms of this Chapter are City property and cannot be leased, sold, transferred or assigned in any manner.

The evolution of Portland's permitting system, however, has resulted in practices and perceptions that are not consistent with this code requirement, as is true in other cities that lease permits directly to the company. The City has limited the number of taxi permits and has reissued them year after year to the currently permitted companies. Over time, this may mean that the control of the permits is not seen as residing with the City, as intended, but is seen as having a value that the companies “own” and may thus lease to the drivers.

Currently, however, there is no regulatory mandate for the companies to provide a particular level or quantity of services. Nor is there any regulation of the types or amounts of charges that may be made by the company to the driver. Many drivers now own and maintain their own vehicles. The amount of dispatch calls provided and the amount of advertising support vary widely between companies, with no accompanying discount in “kitty” fees. Some companies provide fewer services to drivers and shift additional operating costs to drivers. Mundy notes the tendency of companies in the current environment to decrease or fail to evolve the services required to provide good support to drivers (Mundy, 2010, Saskatoon, p. 10).

The Colorado Public Utilities Commission has also noted the potential for little competition for drivers and high lease rates when taxi permits are concentrated within the hands of a few companies (Colorado Public Utilities Commission, p. 5-6, 40-42, 47). Potential drivers have a very limited number of options from which to choose. Competition between companies for drivers is diminished. There is less incentive for companies to provide better and lower cost services to the driver, except at a driver-controlled company. Stagnant permit distribution of a limited number of permits may thus put many drivers at a disadvantage.

It helps the overall stability of taxi service when there is a strong and diverse pool of potential drivers. And it helps create stability in the company's finances, if they have sufficient permits for the size of the area they are serving and in relation to the other companies. The problem comes in when there is strong regulation on one end of the system—a limited number of permits going to a predetermined set of companies—with no balancing regulation regarding the company's relationship with the driver.

All Portland taxi companies receive a set payment (the “kitty”) from each driver for a set time period—typically a monthly, weekly or a daily shift payment. Overall, these payments from taxi drivers to the company have become the main source of income for Portland taxi companies.

“Kitty” amounts charged vary based upon the type of driving, ownership and the number of drivers per cab. The driver may decrease his weekly “kitty” payment by adding another driver to the vehicle on a second shift. This decrease, however, may have a minimal impact on the actual cost of payments to the company because of other additional administrative charges.

At some companies, there is only a minimal one-time payment required of the driver who adds a second driver to his or her vehicle. At other companies, although the first driver’s weekly “kitty” is somewhat reduced, there are additional payments required every week from the original driver, as well as the second driver. Therefore, at some companies, adding more drivers to a vehicle does not result in a significant change of the average kitty paid on the vehicle, although it introduces slight variation in charges from one driver to another.

As discussed above, the average weekly payment from driver to company at non-driver-owned companies is roughly \$500 per week and this payment does not deviate substantially at the various non-driver-owned companies. This is substantially different from the average kitty collected at the one driver-owned company, which averaged \$245 in the most recent year, less than half the average “kitty” amount at the non-driver-owned companies.

In addition to the weekly (or per shift) “kitty” amount charged to drivers by taxi companies, some companies assess various other charges to drivers. These include penalty charges or administrative fees for processing complaints, incorrectly submitted receipts, late receipts or payments, and driver violations of City Code or company requirements.

Part 4: Taxi Driver Interviews

Drivers at the one driver-owned company, Radio, generally report satisfaction with income, which is significantly higher than the average at all non-driver-owned companies, as indicated above. The weekly “kitty” fees at Radio are charged and redistributed differently from any other Portland taxi company. The “kitty” or weekly payment amount from the owner-drivers to the company is adjusted downward throughout the year as company profits allow. Once operating costs are paid, profits are returned to the “owner-operator” drivers. The company administrative fee for second shift drivers is minimal.

Fees are also kept to a minimum for the lease drivers. Radio owner-operator drivers elect Board representatives and participate in the decision-making process regarding company policy. Although the profits of the owner-operator drivers at Radio are partially subsidized by part-time and occasional lease drivers, even non-owner-operator drivers at Radio benefit from lower payments to the company.

Drivers from the non-driver-owned and the driver-owned companies alike reported other benefits from the driver-owned structure, including high levels of company investment in advertising and other promotional methods to bring the drivers more business. Several drivers who had switched from non-driver-owned to driver-owned companies reported a much higher number of calls dispatched and thus higher earnings resulting from company dispatched calls, as opposed to driver-generated calls.

In general, there was a high level of consistency when speaking with the drivers at non-driver-owned companies about their concerns and the particular problems they experience under the current system. The problems cited were also highly consistent with problems cited during driver interviews in other cities (Abraham, Sundar and Whitmore, p. 5, 14, 22-23; Blasi and Leavitt, p. 5; Bruno, p. 13-14; Colorado Public Utilities Commission, p. 7-8; LAMP, p. 5, 17-31).

Although we found a very high degree of consistency across drivers, it is important to note that all the problems discussed do not necessarily occur at all companies. And, while drivers cited concerns with many similar issues across the non-driver-owned companies, the degree of dissatisfaction often varied depending upon differences between companies or between individual drivers.

Although we report below on the significant differences in driver compensation and working conditions at the one driver-owned company in Portland, it is important to note that driver share ownership is not a panacea, but one of several important factors. The problems that exist for Portland taxi companies and drivers are the outcome of numerous factors, including variations in company size. Sound company management is also a key factor to driver success.

The “Kitty”

Most drivers we spoke with expressed strong concerns and dissatisfaction related to the amount of the weekly payments required by the non-driver-owned companies. They complain that it is impossible to make a living wage and properly support themselves and their families after making the “kitty” and other payments to the company.

Drivers described the difficulty of having to turn over to the company \$500 or more per week even before beginning to cover operating costs (gasoline, airport fees and vehicle maintenance). The pressure increases

when drivers have one or two slow shifts in a week, or are faced with unexpected expenses, such as vehicle repairs.

Many drivers spoke of borrowing from other drivers, family or friends in order to pay their kitty and keep their contract current, and thus their space on the roster.

Drivers reported that at some companies they must meet the weekly payment even when they are unable to work and thus have no fares. A driver will often try to find another driver to take over scheduled shifts when ill or when there is a family emergency because they must continue to pay the “kitty” each week in order to avoid late fees and stay on the roster.

Sometimes there are additional fees to the company for any driver that is added, even further tightening the potential profits for the main driver. At some companies, the substitute driver also has to pay a “kitty” and additional fees.

Substantial late fees (\$50 to \$100) may be charged to the driver if their “kitty” payment is late.

The narrow margins of profit in any given week are further decreased by the general economic slowdown and decreased airport travel. The kitty amount at non-driver-owned companies has not come down to match the slowing economy. Only the driver-owned company, Radio, adjusts the kitty downward as company expenses are covered.

Other Driver Payments to the Company

In addition to the “kitty” for shifts worked, drivers may be assessed other types of charges by the company. The drivers point to various additional required payments charged by some taxi companies, and assert that the systems for issuing these penalties are sometimes unfair and excessive.

Typical additional fees range from \$10 to \$100 per incident and may include:

- Administrative fees to add a driver to an owned vehicle;
- Charges for investigating a complaint from a customer;
- Charges for investigating a complaint of a City Code violation;
- Administrative fee for extension of “kitty” payment deadline;
- Late fees for late “kitty” payments without extension;
- Fee for failure to pick up an accepted trip;
- Financial penalty for incorrect or late receipts;
- Fee for failure to inspect or maintain vehicle per contract;
- Financial penalties for accidents, unsafe driving or tickets.

Several companies have potential fees associated with serious complaints or safety violations, as well as fees for making late payments or turning in receipts late. At most companies, however, these fees are very rarely charged to the driver, who is often given an opportunity to present extenuating circumstances. At several companies, driver committees assist with decisions about whether or not to issue fees or penalties for particular incidents.

Many of the penalty types listed above are a significant source of company income only at Broadway/Sassy's, and are assessed to drivers much less frequently at the other Portland companies.

Drivers at several companies also mention fear of cancellation of their contract if they question company policies or fees assessed.

Working Hours and Time Off

Drivers cite long hours—often working 12 working hours per day, 6-7 days per week—to be able to meet the required company payments and provide income for their families. Drivers spoke about their inability to support themselves and their families, and meet the weekly payments for the “kitty,” gasoline, and vehicle maintenance, unless they work these long hours. This is consistent with taxi driver working conditions in other cities (Abraham, Sundar and Whitmore, p. 23; Blasi and Leavitt, p. 5, 21-22; Bruno, p. 7; LAMP, p. 3, 18-21).

Drivers report that it is typical for them to work without vacations for long periods of time, often years, because vacations (and days off) are not affordable under the current structure of the business. In addition to saving money for the vacation and other expenses during the time off, there is the challenge of meeting the “kitty” payment during their time off.

During interviews, numerous drivers expressed concern that these long hours do not allow them sufficient time to spend time with their spouse and children. They are unable to participate in school events or homework, or enjoy recreational activities or vacation breaks with the family.

Conversations with managers and owners of the non-driver-owned companies confirmed that 12 to 14 hour shifts are common at virtually all of the non-driver-owned companies.

Again, as with the income differences seen above, the situation is very different at the one driver-owned company. At Radio, an owner-operator average shift length is 7 hours and 57 minutes. A lease (non-owner) driver averages a shift of 8 hours and 27 minutes. Cabs at Radio are shared between two drivers, one working day shift and one working night shift. The average number of shifts per half cab is approximately 5.5 shifts per week.

Driver Health

Taxi drivers do not receive health insurance benefits. Drivers spoke of their concern about lack of access to health care and their inability to take time off when ill. Several drivers told of continuing to work while sick, which frequently resulted in more serious illness than if they had been able to seek treatment earlier. It was reported to us that drivers who are seriously ill, for example receiving chemotherapy or surgery, often continue to work more hours than advisable during treatment and recovery.

Drivers report sometimes making “kitty” payments for sick drivers, despite their own difficulties with meeting these payments each week. Drivers sometimes volunteer money or driving time to help meet the kitty and hold on to the company “slot” for a sick driver or a driver receiving ongoing medical treatment. Many of the drivers interviewed also talked about working while ill and seeing other drivers working while ill.

Several drivers reported that drivers injured in accidents have had their contracts immediately terminated by the company. The costs of their treatment are not paid by the company insurance. In several of the studies we reviewed, the issue of insurance coverage for driver injuries was highlighted as a major industry concern.

Portland, like other municipalities, requires companies to carry insurance coverage for bodily injury, but it has been industry practice to exclude the driver from this coverage. Nor is the independent contractor driver eligible for workers compensation insurance.

An accident or injury can thus be devastating to the independent contractor driver. The injured driver is without coverage to pay for the medical care necessary for recovery. He or she may also lose the contract with the company because of an inability to work and pay the weekly “kitty”.

Many of the drivers with whom we spoke complained of a high incidence of serious disease and early death amongst local taxi drivers. They cited several specific examples. It is difficult to adequately assess the significance of this anecdotal information. We do note, however, that the documented long working hours, lack of time off, and lack of access to adequate health care put drivers at high risk for health complications, as has been noted in other studies of taxi driver working conditions.

Again, these same problems were reported in other cities (Abraham, Sundar and Whitmore, p. 22-23; Blasi and Leavitt, p. 5, 32-35; LAMP, p. 3, 25-27). Several taxi company managers also mentioned serious concerns about the lack of health care coverage and access for their drivers.

Retirement

The problem of insufficient retirement income is particularly grave for professional taxi drivers under non-medallion systems. As independent contractors making their own social security payments, it is often difficult for taxi drivers to also save additional funds for retirement. Unless they have been able to save for retirement on their own, professional drivers are often forced to delay retirement indefinitely.

Several drivers with whom we spoke are beyond the typical retirement age, but stated that they have trouble imagining how they could afford to retire and intend to continue to work as taxi drivers into the foreseeable future. Some cities regulate the upper age limit for taxi drivers, but Portland does not.

Some drivers who are nearing retirement age have called for a permitting system that would provide a return on the years of investment they’ve made, such as a medallion system.

At Radio, the owner-drivers have the ability to sell their share in the company when they wish to retire from the business. Although the value of this share is insufficient to cover retirement costs, it is some return on the investment made during the years of employment.

The Company-Independent Contractor Relationship

As mentioned above, in recent years, most taxi drivers were moved from classification as employees to independent contractor status. Many employment regulations do not apply to independent contractors and they may not form a union. Although some taxi drivers in recent years have begun to argue for status as employees, many drivers wish to retain their independent status. The State of Oregon has stepped into this issue, determining that many drivers are, in fact, employees. These determinations are currently under appeal.

Some drivers expressed strong concerns about how easy it is to lose their contract or their position in the rotation. We received reports of driver terminations that resulted from a driver questioning policy or disputing a financial penalty. Even without a full, independent evaluation of individual circumstances, it is worth noting that, as independent contractors, contracts may be cancelled without pre-notification or cause.

When termination of a contract occurs, the situation of the taxi driver is somewhat unique as an independent contractor due to the limitation set by caps on permits. Unlike other independent contractors, the taxi driver's only option is to contract within a small number of permitted companies. Even when a company may wish to hire an additional available driver, they may only do so if another driver leaves and makes a permit space available.

Driver contracts may also be immediately terminated when "kitty" payments are missed or when a driver is too injured or ill to work. Even if a driver finds a way to make the payments and pay the late fees, they may have lost a good position in the rotation that governs driver working days and hours.

Lack of Facilities

Drivers also reported suffering from a lack of facilities during the long hours in their vehicles and on the road. Many drivers expressed serious concerns about the lack of adequate facilities for shelter, rest and eating breaks. One particular example was the area at the airport "backfield," where drivers may spend hours waiting for each fare to downtown. There is a lack of indoor facilities, limited access to food or snacks, and very minimal rest room facilities. Drivers have few options for getting out of their vehicles to stretch or rest during wet or cold weather.

Impacts on Safety, Service and the Community

It is easy to recognize the potential risks to safety and service resulting from the long hours and financial pressure endured by taxi drivers (Blasi and Leavitt, p. 25). 12-14 hour shifts for prolonged periods are an obvious detriment to the alertness of drivers and their ability to respond well while driving. The pressure of large weekly "kitty" payments to the taxi company make it more likely that drivers will make less safe choices: driving while tired or disobeying traffic devices or speed limits. Schaller has documented the relationship between driver incomes and taxi crashes in New York City.

Drivers mentioned that long hours make it difficult for drivers to be involved a child's education or spend adequate time with the family. The lack of health insurance impacts not only the driver's health, but also the health of the driver's children. These negative effects family members are echoed in the driver comments from other cities (Blasi and Leavitt, p. 5, 23-25, 29-30; LAMP, p. 26). The lack of health care and retirement for taxi drivers surely contributes to additional medical and social service costs to the community (Blasi and Leavitt, P. 32-34, LAMP, p. 25-26).

Part 5: Conclusions

The calculated average hourly income of full-time Portland taxi drivers at non-driver-owned companies is \$6.22 per hour. These low hourly wages are consistent with those found in recent studies in other U.S. cities.

Taxi drivers work as independent contractors and low wages are not supplemented with health care or retirement benefits, paid vacation or sick leave.

High weekly payments to the taxi company (the “kitty”) are a significant portion of driver expenses and a major contributor to the low net income and long working hours of the professional taxi driver.

The average income of full-time drivers at Portland’s one driver-owned company is significantly higher than the average at all non-driver-owned companies.

Drivers at non-driver owned companies typically work longer hours—often 12 hours per day, 6-7 days per week—to be able to meet expenses and provide income for their families. Drivers at the driver-owned company work approximately 8 hours per day, 5.5 days per week.

All of the existing taxi companies in Portland should be recognized for their success throughout the years in growing and maintaining their businesses, undertaking substantial innovations and improvements, and providing taxi service and employment opportunities in a rapidly changing and unpredictable industry. It should also be noted that the two larger taxi companies were able to expand and obtain additional permits before the current system of taxi caps was put in place. Furthermore, it should be noted that “kitty” payments from taxi drivers constitute a primary income source for all Portland taxi companies.

The current City of Portland permitting system limits the number of taxi permits and reissues them yearly to the same companies. There is a relatively unlimited pool of those seeking work as taxi drivers, who must be accepted by one of the five established and permitted taxi companies to work within Portland. City Code regulates taxi fares, but says relatively little about the services the companies must provide to the drivers. Charges by the companies to their drivers are not limited or otherwise regulated. Tight regulations of permit numbers and fares, without corresponding regulation of the company-driver relationship, has created an imbalance that does not promote competition amongst companies to provide better services at lower cost to drivers.

Three out of five Portland taxi companies have significantly fewer permits than the two larger companies, and have been unable to obtain additional permits for many years. These smaller companies realize significantly less operating revenue, and are unable to lower the “kitty” payments required of their drivers without additional permits.

Portland is not alone in facing the need for regulatory reforms to keep pace with a rapidly changing market. Economic downturn and competition from other sectors have put increasing pressure on taxi companies and drivers alike. Companies have had to adjust their business models to deal with shrinking profits, but in many cases, without sufficient regulatory guidance.

The economic and working conditions creating problems for Portland taxi drivers are consistent with conditions found in other cities and counties. Changes in the taxi industry during the past several decades have created conditions that are not adequately managed by outdated taxi permitting systems and regulations.

The evolution of taxi business models across the U.S and elsewhere is causing many jurisdictions to recognize the need for adjustments to taxi permitting systems and additional regulations regarding the driver-company relationship. Strong regulation of some aspects of taxi service (permit distribution and fares) without adequate regulation in other areas (driver payments and working conditions) contributes to the poor working and economic conditions for professional, full-time taxi drivers.

To balance strong regulation of taxi fares and taxi permit limits, the City of Portland should consider additional regulation pertinent to the working conditions of taxi drivers, and the needs for growth, innovation and sustainability in the taxi market.

Skillful company management and support to drivers play a significant role in driver working conditions and profits, regardless of independent contractor status, company size or ownership. The longstanding contributions of Portland's currently permitted companies and drivers must be recognized. Their knowledge and expertise must inform our plans for solutions to current problems. Changes to regulations must provide opportunities for drivers and companies alike in order to meet the goals of safe, efficient and sustainable taxi service to the community.

Long hours, inadequate rest and health benefits, and the pressure for drivers to make large weekly payments to companies have negative impacts on customer safety and service, and may push the costs of medical and other services onto the community.

The current system of issuing taxi permits is lacking:

- Sufficient incentives to create sustainable working conditions for drivers;
- Adequate pathways for the existing companies to obtain an adequate number of permits;
- Requirements that promote community values, such as fuel-efficient vehicles; and
- Effective regulation of the payments from drivers to companies.

Some municipalities have begun to regulate the services that must be provided to the driver in return for the "kitty" payments, and to set limits on the types or amounts of charges to drivers. Others have begun to experiment with a limited number of permits issued directly to drivers, based upon longevity or other systems for making permits directly available to full-time career taxi drivers. Some systems allow drivers to move from one company to another, while requiring affiliation with a company that provides dispatch and other services, thus promoting better service and lower fees for drivers through company competition. All of these options deserve consideration in Portland.

Regulatory Division staff is currently reviewing possible changes to our regulation and permitting system that could improve the economic and working conditions for all taxi drivers in Portland. We also recognize the longstanding investment and services provided by Portland's existing taxi companies. We are focused on finding solutions that will allow these existing companies a fair opportunity to improve and expand their businesses in the context of new requirements.

Part 6: Recommendations and Next Steps

This is a preliminary report. We have surveyed and assessed the problems reported to us by taxi drivers in Portland, and explored the ways in which these problems are related to the system by which taxi permits are issued, the current number of permits held by each company, and the need to update and balance the Portland taxi regulations.

The Regulatory Division and the Private For-Hire Transportation Board should undertake an intensive period of comment from drivers, companies and other stakeholders. The Board should review and consider the options for regulations designed to improve driver conditions that might be relatively quickly implemented, including a temporary cap on the "kitty." In addition, the Regulatory Division and the Private For-Hire Transportation Board must consider and weigh the options for adjustments to the taxi permitting system that will promote more sustainable driver conditions and wages, as well as promote other community values.

The next steps include:

- 30-Day Formal Comment Period on this report: Taxi drivers, company representatives, and all interested parties are invited to submit written comments that may be added to our analysis. The comment form may be found online at <http://www.portlandonline.com/omf/index.cfm?c=57734>. We will also accept written commentary at the Revenue Bureau Office, 111 SW Columbia, Suite 600, Portland, OR 97201.
- A series of stakeholder meetings will be scheduled to occur within the next 60 days. These stakeholder meetings will be held at various locations and times, in order to allow the maximum participation and commentary by taxi drivers and company representatives as the Regulatory Division prepares recommendations regarding permit distribution and additional regulation.

This report was prepared for Mayor Sam Adams and the Private For-Hire Transportation Board by Kathleen Butler, Regulatory Division Manager, with the assistance of Scott Karter, Audit Supervisor, and under the direction of Thomas W. Lannom, Revenue Bureau Director.

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Appendix

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