



December 23, 2019

Director Kate Toran
Taxis and Accessible Services Division
1 South Van Ness Ave, 7th Floor
San Francisco, CA 94103

Thank You for Protecting Road Users from Taxis with Open Recalls

Dear Director Toran:

The Center for Auto Safety (Center) is writing today to commend the San Francisco Municipal Transportation Agency (SFMTA) for prohibiting vehicles with unrepaired federal safety recalls in your jurisdiction from carrying passengers. Taxis with open recalls endanger not only drivers and passengers but also other road users, pedestrians, and cyclists. Vehicles are only recalled when there is a safety defect or a violation of a federal regulation. Recalls are never undertaken for cosmetic reasons, and the SFMTA has been protecting potentially thousands of San Francisco residents and visitors every day who would otherwise be unknowingly exposed to these deadly risks. Taxis are regulated by your Division, and consumers presume that your oversight protects them from the safety risk of recalled vehicles.

Today, there are over 70 million cars with open recalls across the country, including vehicles with exploding Takata airbags causing at least 24 deaths and General Motors vehicles with faulty ignition switches causing at least 124 deaths. The safety risk of taxis with open recalls continues to plague other cities: one in six taxis has open recalls in DC, one in three among Seattle, New York City, Tampa, and Houston.¹

The Center, the nation's premier independent, non-profit consumer advocacy organization dedicated to improving vehicle safety, quality, and fuel economy, makes this commendation on behalf of our members and all drivers, passengers, and pedestrians who live in, or visit, San Francisco. We commend the SFMTA's nation-leading efforts to keep taxis safe for all road users, and we recommend the recall-free requirement be made explicit and prominent on the

¹ Whitney Wild, *1 in 6 DC Taxis Have Open Recalls and Warnings are Regularly Ignored*, WUSA9 (May 9, 2018), <https://www.wusa9.com/article/news/local/dc/1-in-6-dc-taxis-have-open-recalls-and-warnings-are-regularly-ignored/65-548809101> (finding that one in six DC taxis has open recalls, based on a review of 5,400 VINs); Danielle Leigh, *Could Your Next Cab, Uber, or Lyft be Unsafe?*, THV11 (Nov. 24, 2016), <https://www.thv11.com/article/news/investigations/could-your-next-cab-uber-or-lyft-be-unsafe/354771686> (Seattle, New York City, Tampa, and Houston). See also Ryan Felton, *1 in 6 Uber and Lyft Cars Have Open Safety Recalls, Consumer Reports' Study Suggests*, CONSUMER REP. (Aug. 16, 2019), <https://www.consumerreports.org/ride-hailing/uber-and-lyft-cars-have-open-safety-recalls/> (finding that almost one in four New York City taxis has open recalls, based on a review of 32,000 VINs).

SFMTA's website and other safety materials. Such a requirement is something the SFMTA should be promoting, because maintaining a taxi fleet free from open recalls is a safety feature that attracts customers. Further, educating consumers about this requirement could help the taxi industry stay competitive with rideshare companies such as Uber and Lyft, neither of which requires their vehicles to be repaired when under recall, a safety lapse which continues to place their drivers, customers, and everyone on the road at risk.

We are interested in learning more details of how the recall-free requirement was enacted, how information regarding this requirement is distributed, and all available information related to the cost, effectiveness, and compliance with this requirement. The Center would happily share and promote the details about your experience implementing such an important safety program with other cities that are lagging behind San Francisco's efforts.

In conclusion, taxis with open recalls pose a serious safety risk for everyone in San Francisco. Because taxi owners may be resistant to removing vehicles out of service due to potential lost income while the vehicles are being repaired, we are glad the SFMTA directs these repairs be made for everyone's safety. The Center for Auto Safety commends the SFMTA for taking decisive actions and requiring San Francisco taxis to not be on the road with open recalls.

Thank you for your attention to this important matter,

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Levine". The signature is fluid and cursive, with a large loop at the beginning and a long tail.

Jason Levine
Executive Director
Center for Auto Safety