

The Honourable Peter Bethlenfalvy
Minister of Finance
Frost Building North, 3rd Floor
95 Grosvenor Street
Toronto, Ontario M7A 1Z1

January 30, 2026

Dear Minister Bethlenfalvy,

Restoring Ontario's Ground Transportation Market Integrity

We write as a coalition of public-safety leaders, industry representatives, worker organizations, and accessibility advocates committed to safe, equitable, and responsible ground transportation across Ontario.

We welcome Ontario's commitment, announced in the Fall Economic Statement (November 25, 2025), to develop more consistent province-wide standards. We recommend a single, dispatch-neutral rulebook for taxis, limousines, and app-dispatched services that:

- i. **Enables the public to verify, at the curb**, who is authorized to drive, what vehicle is authorized, and which operator/broker is responsible; and
- ii. **Equips enforcement with real-time legality checks** and audit-ready records to prevent rising fraud and public-safety risk.

Ontario Provides \$3 Billion in Hidden Subsidies to U.S. RideShare Corporations

Open-entry, light-touch approach across Ontario in the ground transportation sector provides favoured market status to U.S. headquartered rideshare corporations. This favoured market status functions as a hidden subsidy, not innovation. It shifts real costs off platforms and onto public systems and compliant operators. Key hidden-subsidy channels include:

- **GRIDLOCK AND PRODUCTIVITY LOSS:** approximately **\$1–\$3B/year** in **additional gridlock burden** and spillover costs; .

- **VALUE LEAKAGE FROM ONTARIO TO THE U.S:** approximately **\$0.5–\$1.7B/year** in economic rents and profits extracted out of Ontario, enabled by regulatory asymmetry and non-compliance incentives (e.g. weaker identity verification, training, accountability, and enforcement requirements than those imposed on compliant Ontario taxi operators, together with predatory pricing, wage theft, downward pressure on labour and consumer protections, and safety omissions);
- **PUBLIC RISK TRANSFER: multi-billion downstream costs** linked to enforcement drift, fraud/unlicensed operations, safety incidents (sexual assault, fatalities), and transit erosion. The City of Ottawa alone [was found liable](#) in a \$213 million judgement in 2024.¹

Recommendations: What we are Asking Ontario to Do

Recommendation 1 - Stop Favourable Market Access to U.S. Rideshare Corporations: No Longer Defensible Position

While Uber (launched in San Francisco in 2010 as “UberCab Inc.”) was first to scale app-based dispatch and in-app payment systems across the North American ground transportation sector, app-dispatch and payment technology is now the industry norm. Uber and Lyft are U.S.-headquartered corporations whose Ontario operations are shaped by global capital markets and large institutional shareholding. Largest shareholders include: Blackrock, Vanguard and State Street. **It is no longer defensible for governments to treat app-dispatched operators as a separate “TNC” category.** Across jurisdictions, including Canada, the legal consensus is clear: once tested against substance-over-form analysis, the functional reality is the same. Taxi brokers and U.S. ride-share corporations perform the same market function: they both sell rides and operate vehicle-for-hire (VFH) ground transportation services. Uber/Lyft exert employer-like control over drivers, supporting worker (employee or “worker”) status despite contractual labels.

- “The notion that Uber in London is a mosaic of 30,000 small businesses linked by a common **platform** is, we think, **faintly ridiculous.**”²
- “Uber is **no more a “technology company”** than Yellow Cab is a “technology company” because it uses CB radios to dispatch taxi cabs ...”³
- “The realities of Lyft’s business...encompasses the **transportation of riders.**”⁴

¹ *Metro Taxi vs City of Ottawa* [2024] ONSC 2725

² *Uber BV and others v Aslam and others* [2021] UKSC 5

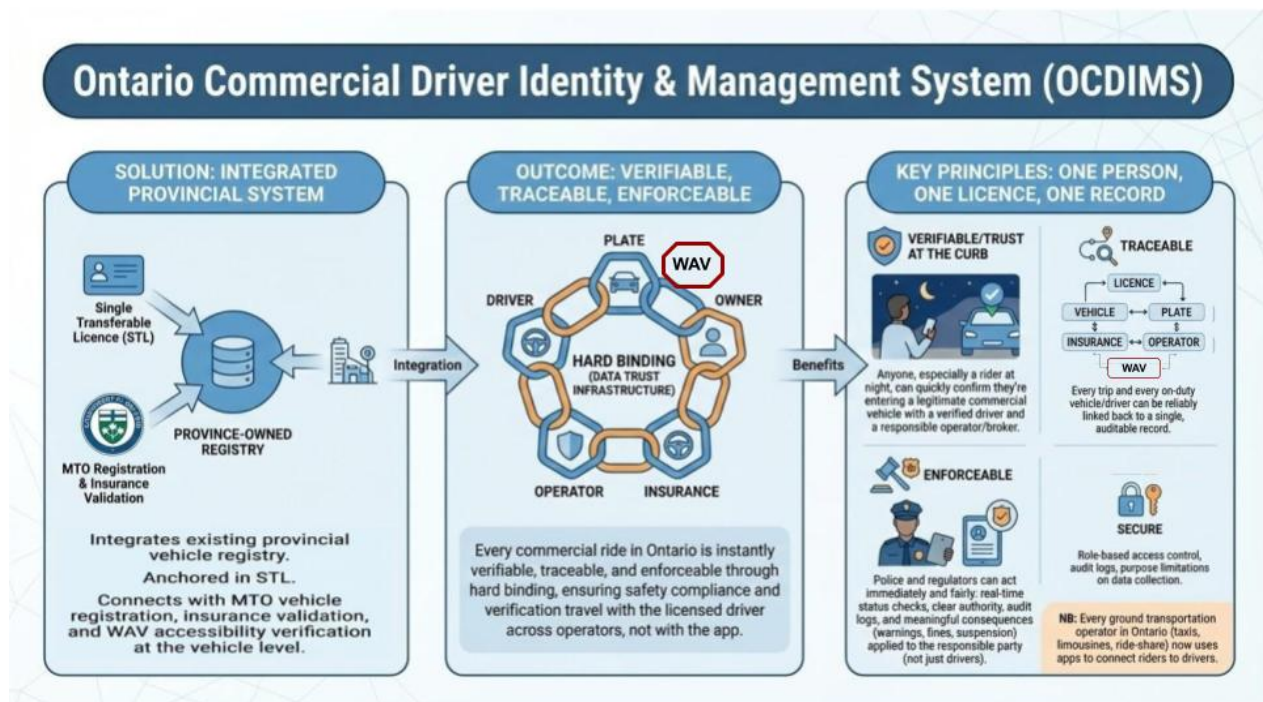
³ *O’Connor v Uber Techs, Inc*, 82 F Supp 3d 1133 (ND Cal 2015)

⁴ *Cunningham v Lyft, Inc*, 450 F Supp 3d 37 (D Mass 2020)

- "The suggestion in the driver agreement that Uber is merely a payment intermediary for fares paid by riders to drivers ... is **not consistent** with the realities of the relationship."⁵

In [Metro Taxi vs City of Ottawa, 2024](#), the Superior Court of Ontario labelled Uber a “bandit taxicab ... that operated illegally, while regulators stood by”. The ruling provides a clear warning that courts will scrutinize government decisions that weaken enforcement and public safeguards in a licensed transportation market, where harms are known (or should be known) and foreseeable.

Recommendation 2 - Establish an Ontario Commercial Driver Identity and Management System (OCDIMS)



Establish an **Ontario Commercial Driver Identity and Management System (OCDIMS)** as a province-owned identity, verification, and enforcement backbone for all commercial ground transportation (taxis, limousines, and U.S. app-dispatched services).

OCDIMS should integrate the existing Ontario MTO Vehicle Registry (Plate/VIN) with new, mandatory data feeds and authorizations:

⁵ *Rasier Operations BV v E tū Inc*, [2024] NZCA 403.

- Single Transferable Licence (STL Driver ID);
- Insurance Validation;
- Operator/Broker ID (including verified WAV capability, where applicable).

OCDIMS should be discussed and developed as part of Ontario’s upcoming Ground Transportation Review to incorporate a robust, consistent Vehicle Visual Identification Program which provides consumers and law enforcement agencies with the visual identifiers (signage, ID numbers) and technical verifiers (QR codes, RFID labels) required to confirm service providers.

OCDIMS Outcomes: OCDIMS would create a single, integrated compliance baseline that:

- Improves public safety and accessibility;
- Reduces fraud and identity slippage;
- Restores consistent rule-of-law enforcement across Ontario’s ground transportation sector—regardless of business model or branding.

OCDIMS Core Outputs: OCDIMS is a prevention-by-design system that replaces today’s fragmented, platform-permissioned verification regime with a province-governed standard where every commercial ride is:

- **Verifiable at the curb:** public verify-on-demand (e.g., QR) confirming driver identity, vehicle authorization, and insurance status.
- **Traceable:** end-to-end, audit-logged records linking the ride to authorized parties.
- **Enforceable in real time:** police-accessible validation and “rules that bite,” including operator accountability and aligned provincial–municipal enforcement.
- **Auditable:** standardized records for identity, licensing, fees, and (where required) pricing/dispatch accountability.
- **Accessible** (where relevant): WAV capability becomes verifiable, measurable, and enforceable, not optional or self-attested.
- **Appealable:** meaningful human review and accessible, local complaint pathways with clear service standards.

Hard-Binding Architecture: OCDIMS must hard-bind the critical safety and accountability links: Plate/VIN, STL Driver ID, Insurance Validation, Operator/Broker ID, and WAV verification (where applicable).

Safety Gate Principle: If any binding fails—authorization, identity, insurance, operator responsibility, or WAV verification—the vehicle cannot legally operate on-duty in Ontario.

Why Ontario Must Act Now?

Rationale 1 - Restore Market Integrity and the Rules-Based Order Regulate Oversized U.S. Corporations, that Exert Coercive Powers

Ontario's rules-based market economy is under threat because a governance and regulatory vacuum has allowed the U.S. "ride-share" corporations (Uber/Lyft) to operate with outsized coercive leverage over public decision-making. Beyond the landmark [Metro Taxi decision](#), courts worldwide have repeatedly found that core features of this business model conflict with market integrity, deploying inconspicuous, adhesive digital contracting, misrepresentations (about business nature, labour status, safety claims, and securities disclosures), price-signal manipulation, and systematic efforts to limit oversight, accountability, and access to justice to outcompete compliant incumbents. When governments attempt to strengthen standards, these firms have mobilized **coercive economic powers against Ontarians**, including threats of service withdrawal, "city exit" narratives, and user pressure campaigns, to delay, dilute, or redesign rules in their favour.

End Ontario's Duty of Care Failures

The same under-regulation logic that contributed to the 2008 financial crisis has re-emerged in digital form, through the U.S. "rideshare" (Uber/Lyft) business tactics, compounded by **Ontario's laissez-faire governance** and resulting duty-of-care failures. By allowing core safety, fairness, and accountability rules to become optional in practice, Ontario has weakened the rule of law.

- **Competition (duty to maintain market integrity):** Failure to enforce competition/antitrust and consumer-protection standards, enabling unfair market conduct and distorted price signals.
- **Road safety (duty to protect the public):** Weakening of Highway Traffic Act-level safeguards and the absence of enforceable safety gates (identity, insurance, vehicle authorization).
- **Labour (duty to prevent predictable exploitation):** Erosion of meaningful employment protections—substituting minimal platform-rights rules that do not match the platform's degree of control.
- **Data and finance (duty to make systems auditable):** Gaps in privacy/data access, auditability, tax compliance, and fee recovery—leaving regulators without timely, decision-grade records.
- **Accountability (duty to ensure enforceability):** Fragmented municipal–provincial–federal oversight that creates "enforcement drift," letting foreseeable harms accumulate until they surface as litigation, injury, or public cost.

Reverse Ontario's Slide into Litigation-By-Default (*Restore Preventive Governance*)

As a result, Ontario's ground transportation system has shifted from **routine, preventative enforcement** (identity integrity, current screening, verified insurance, and operator accountability) to litigation-by-default. Instead of regulators stopping foreseeable non-compliance at the point of operation, victims, municipalities, and compliant operators are pushed into costly, delayed court processes to establish facts, obtain records, and secure remedies after harm has occurred, while U.S. corporations retain strategic advantage through opacity and the ability to apply coercive pressure when oversight tightens.

Strengthen Ontario's Rules-Based Market Order in Ground Transportation

Restoring market integrity means Ontario's ground-transportation market competes on **real costs and real compliance**, not regulatory arbitrage or opacity: it requires

- **Price Integrity** (all-in transparency, constrained surge during public-interest events, limits on discriminatory steering, and dispatch-neutral fare rules);
- **Compliance as a Condition of Operation** (real-time safety gates linking identity–vehicle–plate/VIN–insurance–operator responsibility, enforceable fitness-to-operate standards, standardized incident reporting, and uniform accessibility obligations);
- **Identity Integrity** (one person/one licence/one auditable record, anti-impersonation controls, and a clear chain of responsibility);
- **Auditability** (mandatory data retention, timely regulator access without “trade secret” veto, third-party audits, and baseline public reporting);
- **Labour and Consumer Protections** (earnings/expense transparency, due process for discipline/deactivation, anti-retaliation, plain-language contracting, refund/dispute standards, and bans on dark patterns);
- **Competition Safeguards** (no two-tier rules, scrutiny of predatory below-cost growth, anti-tying/exclusivity limits, and market monitoring);
- **Modernized Enforcement** (shared verification interfaces, scalable penalties, and aligned municipal–provincial oversight to prevent enforcement drift); **fiscal integrity** (fee/tax compliance and cost internalization); and
- **Substance-Over-Form Governance** (a functional test that treats enclosed platform control systems as operators when they set prices, control access to work, and govern key conditions).

See Appendix A for further details.

Rationale 2 - Fix the Scale Mismatch: Municipalities vs Global Corporations

Scale Mismatch: Local Enforcement vs. U.S. Capital-Backed Operators

Municipal licensing and enforcement systems were designed for local, inspectable businesses: visible vehicles, fixed premises, paper trails, and an operator you can audit on the ground. They are now being forced to regulate rapidly scaling (and giant) U.S.-headquartered rideshare corporations whose “operations” and compliance evidence live inside proprietary apps (private gatekeeping of regulatory data), cloud infrastructure, and cross-border corporate structures. **Friction laden access to meet even the most basic of public safety standards data (identification and verification of who is driving the vehicle) is supported by litigation budgets that can outlast any city.** The predictable result (and growing judicial record) is that ordinary compliance enforcement is converted into complex, expensive litigation that frustrates oversight and delays accountability. The costs land where they should not: on municipal budgets, police, courts, transit systems, and victims (drivers and passengers).

Private Platform Architecture Creates Public Audit Blindness

Control over Ontario’s ground transportation by U.S. corporations is remote, dynamic, and instantly changeable, with limited local footprint and weak local accountability. Key compliance facts, identity verification, insurance-at-time-of-trip, dispatch and pricing logic, trip logs, incident handling, and deactivation decisions, are neither curb-verifiable or regulator-verifiable without compelled, auditable disclosure. Open-entry stock-price driven pressure for “growth statistics” outpaces municipal licensing and inspection cycles, leaving local officers unable to reliably confirm compliance or prove breach.

U.S. Rideshare Tactics Trigger Provincial and Federal Law

Many of the tactics used by the U.S. so-called “rideshare” corporations that defeat municipal oversight do not sit primarily within municipal by-law power. They engage province- and federal-level legal regimes that cities cannot meaningfully enforce on their own, including:

- Competition and market conduct
- Taxation and revenue law
- Contract/arbitration and dispute-resolution design
- Labour and employment standards
- Consumer protection and unfair practices
- Privacy, data governance, and cybersecurity
- Digital evidence, investigations, and obstruction

Municipalities can license, but they cannot build the cross-Ontario identity, verifiable, and enforcement architecture needed to make compliance provable, not merely promised.

Rationale 3 - Reduce Known and Foreseeable Harm Footprint, as well as Fiscal & Legal Exposure

Ontario is not confronting isolated “bad actor” incidents. The dominant U.S. rideshare business model produces a repeatable, province-wide harm footprint because the same design choices recur everywhere:

- Open-entry scaling;
- High churn in drivers and vehicles;
- Insurance coverage subsidized by private auto policy holders
- Platform-controlled verification and recordkeeping;
- Opaque algorithmic pricing/dispatch/earnings;
- Automated discipline and dispute-resolution systems that delay disclosure and accountability.

The downstream impacts are court assessed, foreseeable, increasingly measurable, and, when enforcement is weak, harms are inevitably shifted onto the public balance sheet. The court assessed harm channels include:

- **Gridlock, Emissions, and Infrastructure Burden:** Open-entry, data-driven scaling adds vehicles and VKT into already constrained urban networks. The result is worsened congestion, higher emissions, and greater road and curbside infrastructure burden: costs that land on cities and the province (road maintenance, enforcement, collisions, delays, lost productivity) while being difficult to attribute trip-by-trip without standardized reporting.
- **Public Transit Revenue Loss and Network Destabilization:** Investor-backed “growth first” pricing and convenience can shift riders from transit, particularly off-peak and feeder trips, eroding farebox revenue and weakening network viability. This is not merely a market preference story: it is a structural fiscal risk when public transit must still meet coverage obligations while revenue and reliability are undermined.
- **Accessibility and AODA Compliance Risk:** On-demand mobility expanded faster than enforceable accessibility supply obligations, standardized Wheelchair Accessible Vehicle (WAV) verification, and auditable reporting. Without enforceable requirements and transparent performance data, the system produces predictable outcomes:

unreliable accessible service, unequal wait times, and limited redress—placing Ontario’s accessibility commitments under pressure rather than advancing them.

- **Human Rights and Disparate Impacts:** These failures concentrate harm on communities with fewer alternatives and higher baseline vulnerability—women, disabled riders, and racialized communities—who rely most on curbside verification, safe service, and rapid incident response. When identity binding is weak and accountability is opaque, risk becomes unevenly distributed. The emergence of community-driven “workarounds” and alternative services in response to discrimination concerns is a warning signal: it indicates a system generating foreseeable disparate impacts when standards are not enforceable and performance is not auditable.
- **Public Safety and Violent Incident Exposure:** Where identity and compliance evidence are platform-held (not government-bound and curb-verifiable), incident prevention and investigation degrade. Reported serious incidents, including sexual violence allegations and fatalities, become harder to deter and harder to resolve because the core facts (who was driving, whether insurance was valid at the time, trip path/time, prior complaints) can be slow-walked, fragmented, or contested. The harm is magnified when platforms do not release complete, standardized incident data and governments lack mandatory reporting and audit powers.
- **Crime, Fraud, and “Phantom” Operations Expanding:** Weak identity binding between driver, vehicle, insurance, and responsible operator creates predictable grey markets: account renting, identity laundering, shadow fleets, and off-app cash rides. These are not edge cases: they are *incentivized* where verification is inconsistent and enforcement is episodic. The result is a parallel system that expands opportunities for unlicensed operation and fraud while making investigations slower and more expensive.
- **Competition Harms and Below-Cost Market Capture:** Across jurisdictions, competition complaints and rulings identify a recurring pattern: subsidy-fuelled market entry, algorithmic control over price/dispatch, and opacity that suppresses rivalry and accelerates concentration (including hub-and-spoke dynamics where the platform coordinates key terms at scale). The Ontario risk is straightforward: below-cost pricing can displace compliant incumbents and destabilize local alternatives, and once the market is hollowed out, pricing power can reassert, leaving the public with fewer choices and weaker safeguards.
- **Labour Precarity and Disposable-Driver Dynamics:** Under the U.S. platform model, drivers are managed as interchangeable “units of supply,” not as safety-critical, rights-bearing participants in a regulated system. In Ontario, that disposability is enabled

when legitimacy is mediated through platform accounts and municipal cycles rather than a single, real-time provincial authorization gate. High churn produces stale verification, identity slippage, and enforcement drift, while opaque dispatch and rapid deactivation can function as coercive control without the transparency and due process expected in a regulated market.

- **Insurance Distortion and Cost Transfer:** When commercial activity is conducted under ambiguous or misclassified coverage, risk shifts onto the public and compliant policyholders. In practical terms: personal auto policy pools can end up subsidizing professional driving risk, while victims and public systems face higher friction in claims resolution—especially when identity and trip records are contested or delayed.
- **Consumer Protection and Effective Redress:** Opaque pricing, unclear responsibility chains, and dispute-resolution design can weaken refunds, complaint handling, and accountability. Where evidence is privately controlled, consumers face a “prove it” burden they cannot meet—especially after serious incidents, unless regulators have mandatory disclosure, retention, and audit powers.

See Appendix C for Media/Police reported harm examples in Ontario.

Rationale 3 - Logical Next Step. Burden is Not Excessive

This digital approach aligns with the public-interest **logical next step** advanced by the Canadian Taxi Association (CTA) and our members: taxis have long operated as a safety-critical, regulated service, built on identity integrity, visible licensing, standardized screening, and cooperative relationships with municipal regulators and law enforcement. **Extending the same baseline requirements to US-based app-dispatched corporations does not create an excessive new burden.** It simply normalizes the established safety standard that already exists for compliant Ontario/Canadian operators, deters phantom-cab risk, and ensures competition is based on service quality and efficiency rather than on who can operate with weaker verification, weaker training, or weaker accountability.

OCDIMS Budget Envelopes and Estimates

OCDIMS: Three Funding Envelopes

App-based dispatch and payment are now common across taxis, limousines, and rideshare services. By ending favourable market status for US-headquartered ride-share corporations and applying auditable standards to all operators, Ontario can restore fair competition, reduce extractive market dynamics, and strengthen domestic productivity in a vital sector.

The proposed \$65M over three years funds a province-wide compliance backbone that shifts Ontario from discretionary, complaint-driven enforcement and litigation-by-default to prevention-by-design and real-time enforceability. Investment is structured across three envelopes:

1. **BUILD ONCE — \$30M (capital):** Build the province-owned identity/authorization backbone so legality is verifiable in real time.
2. **MAKE ENFORCEMENT REAL — \$15M (ops + assurance):** Fund enforcement capacity, compliance analytics, and independent assurance so compliance is measurable and enforceable.
3. **INVEST IN ONTARIO — \$20M (transition support):** Help Ontario owner-operators and small fleets meet standards so compliance raises the floor without shrinking community supply.

See Appendix B for further details.

Minister, we respectfully request that Budget 2026 include a dedicated three-year **OCDIMS appropriation**, together with a clear policy directive to implement a dispatch-neutral, province-wide rulebook for all vehicle-for-hire ground transportation.

This is necessary to **restore market integrity and a rules-based order** in the ground transportation across the province.

We further request that Ontario end preferential market access for the U.S.-headquartered ride-share corporations. In 2026, when app-dispatch and in-app payments are the industry norm, there is no defensible basis to regulate these operators as a separate “technology network company” category. The Ontario Superior Court’s 2024 *Metro Taxi* decision is a clear warning that courts will scrutinize government choices that dilute enforcement and public safeguards in a licensed transportation market where harms are known (or ought to be known) and foreseeable.

We would welcome the opportunity to brief your team further and provide a detailed implementation roadmap.

Yours sincerely,

Marc André Way, President
Canadian Taxi Association

Attachments:

Appendix A: Areas to Strengthen Ontario's Rules-Based-Market-Order

Appendix B: Budget and Implementation plan (Proposed)

Appendix C: Media/Police Reported Case Evidence

Appendix A: Restoring and Strengthening Ontario’s Rules-Based Market Order in Ground Transportation

Restoring market integrity means restoring a **rules-based order**. Ontario’s ground-transportation market must compete on **real costs and real compliance**, not on regulatory arbitrage, opaque digital systems, or enforcement gaps. Alongside the logical next step of **auditable, dispatch-neutral digital compliance**, the Canadian Taxi Association (CTA) is providing the Province with a list of **known, foreseeable market harm points** and corresponding policy and enforcement fixes required to close them.

Price Integrity

- **All-in price transparency:** no drip pricing; clear fee/tax breakdown; receipt integrity;
- **Dynamic pricing constraints** tied to public interest triggers (emergencies, evacuations, major disruptions);
- **Price discrimination/steering controls:** ban harmful segmentation; require disclosure of key drivers of price;
- **Comparable fare-rule obligations** across operators (dispatch-neutral, mode-neutral).

Compliance as a Condition of Operation

- **Hard safety gates:** identity, vehicle, plate/VIN, insurance, operator responsibility (real-time validation);
- **Fitness-to-operate standards:** driver screening currency, vehicle standards, camera requirements where applicable;
- **Standardized incident** (assaults, collisions, complaints) **reporting** with defined timelines and verification;
- **Uniform accessibility obligations:** WAV availability, nondiscrimination, service refusals, service quality metrics.

Identity Integrity & Verification

- **One person/one licence** / one auditable record, provincial backbone; anti-duplication controls);
- **Anti-account sharing** / impersonation controls, device binding, biometric/ID re-check cadence, audit trails;
- **Verified operator chain of responsibility**, who is accountable at every step: dispatch, safety, records.

Auditability, Records Access, and Evidence

- **Mandatory data retention**, trip logs, pricing inputs/outputs, safety events, driver status changes;

- **Regulator-ready access**, timely production standards; machine-readable formats; no “trade secret” veto;
- **Third-party audit rights**, independent compliance audits; algorithm/process audits where needed;
- **Public reporting minimums**, safety, accessibility, congestion impacts, complaint outcomes.

Labour Market Integrity

- **Minimum earnings and expense transparency**, net pay clarity; time-on-task vs engaged time;
- **Fair discipline/deactivation** due process, notice, reasons, appeal, meaningful human review;
- **Misclassification enforcement alignment**, operator-like control triggers operator-like duties;
- **Anti-retaliation** and complaint protections (drivers and riders).

Consumer Protection & Redress

- **Plain-language contracting**, conspicuous terms; meaningful notice; procedural traps;
- **Refund and dispute standards**, timelines, evidence rules, escalation paths;
- **Ban dark patterns**, cancellation traps, misleading ETAs, manipulative prompts;
- **Complaint handling performance requirements**, SLAs; tracked outcomes.

Competition and Anti-Evasion Safeguards

- **No regulatory arbitrage**, same functional service, same core obligations;
- **Predatory/below-cost growth strategies scrutiny**, especially where harms are externalized;
- **Anti-tying and exclusivity rules**, prevent coercive dependence on a single platform;
- **Market conduct monitoring**, concentration, monopsony signals, entry barriers.

Enforcement Modernization (from “inspectable” to “digital control systems”)

- **Dispatch-neutral rulebook**, app use isn’t the issue; enclosed control + opacity is;
- **Shared enforcement interfaces**, real-time verification for police/bylaw; standardized checks;
- **Penalties that scale with platform power**, meaningful deterrence; repeat-offender escalators;
- **Cross-jurisdiction coordination**, municipal + provincial data alignment; avoid enforcement drift.

Fiscal Integrity (taxes, fees, cost recovery)

- **Fee recovery for oversight**, audits, enforcement, incident processing;

- **Tax compliance and remittance controls**, transparent reporting; standardized statements;
- **Cost internalization**, congestion, curb management, accessibility funds where justified.

Platform Governance Classification (substance over form)

- **Functional reality test** for when an app is a mere dispatch tool vs an operator-like control system;
- **Operator-level duties** attach when platforms set prices, control access to work, and govern key conditions;
- **Limits on “tech company” labeling** when conduct is a transportation operation.

Appendix B: Budget & Implementation Plan (Proposed)

Our Budget estimate is **\$65M /three years** to **launch OCDIMS** across three funding envelopes.

Envelopes	Architecture Build Details & Ontario Owner-Operator Capability Building Through Grants	Budget/3 Years
OCDIMS System	Deliverable: Integrated province-wide identity, verification and authorization backbone that operators apps/companies must plug into.	\$30M
<u>Infrastructure Build</u>	Envelope Activities: <ul style="list-style-type: none"> ● Single Transferable Licence (STL) issuance + identity verification; ● Registry build (commercial authorization layer; “Active Link”) ● Integration/APIs to: <ul style="list-style-type: none"> ○ MTO Plate/VIN (verify registration status) ○ Insurer validation feed (commercial class; lapse/cancel/events) ○ Operator/broker feeds (licensed entity + responsibility) ○ WAV capability verification (vehicle-level certification flag) ● Public verification page (QR scan, VALID/NOT VALID) ● Police/regulator portal (role-based access + audit logs) ● Privacy, security, and governance (PIAs, RBAC, logging, retention rules, hosting/security hardening) 	
<u>Enforcement Compliance</u>	Deliverable: enforceable standards, not “voluntary compliance.”	\$15M
<u>Police Resources + Provincial Analytics</u>	Envelope Activities: <ul style="list-style-type: none"> ● Dedicated enforcement capacity + joint ops ● Rapid response protocols for serious incidents ● Real-time compliance analytics for police/regulatory use ● Police access portal + audit logs ● Independent assurance and operator auditability ● Accessibility performance monitoring (as an enforceable standard): 	

Ontario SME Deliverable: cameras + curbside verification + real WAV capacity **\$20M**
Owner - becomes achievable for ONTARIO owner-operators and small fleets. **????**
Operator

Grants

Envelope Activities: **\$2K**

- Visual ID package rollout (standardized decals/QR, roof/side ID standards where required)
- In-vehicle camera compliance support (equipment + install grants; small operators prioritized)
- WAV integration supports: WAV vehicle certification workflow (inspection/certification cost supports); Targeted incentives for real, on-duty WAV availability
- Training and annual refreshers (crime-prevention training, accessibility dignity/securement, safety protocols)

	TOTAL	\$65M
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Appendix C: Case Evidence - Media/Police Reported

Over the past 12 years, Ontario, and jurisdictions across Canada and globally, have had time to observe how app-dispatched transport models behave in the real world. The harms are no longer hypothetical: they are documented, repeat-pattern outcomes that show up in police files, public budgets, accessibility complaints, and **critically in court filings and rulings** (*separate document*). **This 12-year record matters for Ontario now: it means the Province is no longer choosing in the dark.**

At the macro level, Uber’s U.S. safety report for 2021–2022 records 2,717 incidents in its most serious categories of sexual assault and misconduct, and the New York Times, reporting on legal cases in th US, reported that 400,181 U.S. trips (2017–2022) ending with reports of sexual assault or sexual misconduct (about one every eight minutes).”

In Ontario, media and police reporting show the two-tier system breaking in predictable ways: US corporations blocking access to data during an emergency, curbside impersonation, vehicle not identifiable as a commercial carrying a passenger, fraud, shadow fleets, and accessibility /human rights compliance becomes optional.

EXAMPLE I: PRIVATE PLATFORM CONTROL OF IDENTITY DATA SLOWS EMERGENCY RESPONSE

Emergency response blocked by post-trip access, platform “policy”: in time-critical incidents, families and police can be unable to reach a driver or obtain identity details quickly, turning urgent response into delayed investigation.



VICTIM DETAILS: Julia, her partner, and their four children took an Uber after their car got a flat tire leaving a Raptors game. Her daughter, Amelia, fell asleep in the third row. While the parents were unloading other children and belongings, the driver suddenly left with Amelia still in the car, unaware she was there.

POLICE ACTION BLOCKED: The family could not reach the driver via the App. once the ride had finished. The Police could not reach the driver via telephone calls to the company. The company refused to share driver information with the police, citing policy.


TRADITIONAL POLICE TECHNIQUES: The Toronto police found the child and driver about 90 minutes later, using traditional police techniques. with the child safe but distressed. The US App company provided a \$10 credit, infuriating the family.

EXAMPLE II: PLATE/VIN LINKAGE FAILURES, PREVENT LIFE SAVING RESPONSE

Crime-prevention,emergency response failures: Weak visual identification and weak Plate/VIN -Driver linkage makes real-time verification of “what vehicle is this?” and “who is driving?” difficult, especially at night and in time-critical events, creating openings for spoofing, rented accounts, and non-compliant vehicles.

**US-App Fatal Car Crash, Peel Region.
Passenger, 20 Year Old Female Found 12 Hours Later**


VICTIM DETAILS & CRASH SCENE



Two-vehicle collision occurred around 4:20 a.m. at the intersection of Queen Street and Chinguacousy Road in Brampton, Ontario.


 US-App driver, 31-year-old Sukhdev Singh, found deceased at the scene.

RIDER NOT IDENTIFIED AT SCENE




Rider, 20-year-old Kourtney Khan, not discovered by first responders due to the severe deformation of the vehicle's rear passenger compartment. Extreme force caused extensive damage, creating a void where the victim was located, making her not immediately visible to emergency personnel.

BODY FOUND AT POLICE POUND 12 HOURS LATER



Her body was found approximately 12 hours later in the car at a police impound lot after her family reported her missing and used a tracking app to trace her phone's location to the crash site.

INCIDENT TIMELINE



T=0: 4:20 AM - CRASH OCCURS → **12-Hour Delay (Police Investigation & Towing)** → **T=12 HOURS LATER: BODY DISCOVERED IN IMPOUND**

VICTIM DETAILS: 20-year-old Kourtney Khan took a Lyft late at night. She was riding in the back seat. The vehicle was involved in a two-vehicle collision around 4:20 a.m. at the intersection of Queen Street and Chinguacousy Road in Brampton, Ontario. The US-App driver, 31-year-old Sukhdev Singh, was found deceased at the scene.

VEHICLE NOT IDENTIFIABLE: Driver/vehicle not identifiable as commercial.




RIDER NOT IDENTIFIED AT SCENE: Kourtney was not discovered by first responders due to the severe deformation of the vehicle's rear passenger compartment, creating a void where the victim was located, making her not immediately visible to emergency personnel at the scene.

RIDER'S BODY FOUND AT POLICE POUND 12 HOURS LATER: Her body was found approximately 12 hours later in the car at a police impound lot after her family reported her missing and **used a tracking app** to trace her phone's location to the crash site.

EXAMPLE III: CURBSIDE IDENTITY FAILURE ENABLES “FAKE RIDESHARE” PREDATION AND TARGETED VIOLENCE AGAINST WOMEN

Two-tier safety,access (predictable adverse impacts): Enforcement drift produces unequal accountability and predictable adverse impacts—especially for women, disabled riders, and racialized communities—because curbside verification and traceability are weakest where risk is highest.

FAKE US-APP DRIVER CHARGED IN VIOLENT SEX ASSAULTS TARGETING ONTARIO WOMEN AT BUS STOPS

VICTIM DETAILS	CURBSIDE FAILURE	CRIMINAL CHARGES
 <p>Multiple victims; women in their early twenties targeted while waiting at bus stops in Brampton and Vaughan.</p>  <p style="font-size: small;">Location: Brampton and Vaughan, Ontario.</p>	 <p>LEGITIMATE RIDE-SHARE APP Verified Driver & Vehicle Vehicle/driver identifiable via app & official decals.</p> <p>FAKE DRIVER DECEPTION Vehicle / Driver Not Identifiable Posed as 'ride-share' driver. No official identification.</p> <p style="background-color: #ccc; padding: 5px;">DECEPTION: POSED AS RIDE-SHARE DRIVER.</p> <p style="border: 1px solid red; padding: 5px; color: red;">The driver, Arshdeep Singh, a 22-year-old international student from India, posed as 'ride-share' driver.</p>	<p>List of Charges:</p> <ul style="list-style-type: none"> • Sexual assault • Sexual assault by strangulation • Sexual assault with a weapon • Three counts of kidnapping • Robbery • Uttering threats <p style="border: 1px solid #ccc; padding: 5px; text-align: center;">Total charges against Arshdeep Singh.</p>

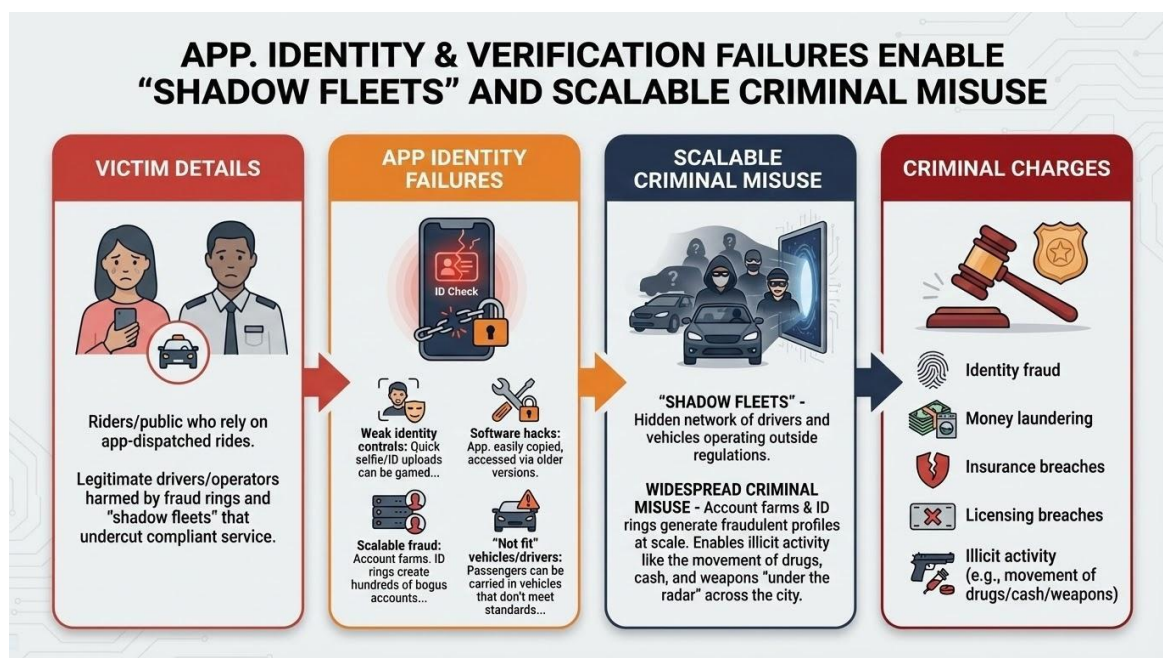
VICTIM DETAILS: Multiple victims, targeting women in their early twenties waiting at bus stops in Brampton and Vaughan

CURBSIDE FAILURE: VEHICLE / DRIVER NOT IDENTIFIABLE. The driver, Arshdeep Singh, a 22-year-old international student from India, posed as a ‘ride-share’ driver.

CRIMINAL CHARGES: Sexual assault, sexual assault by strangulation, sexual assault with a weapon, three counts of kidnapping, robbery and uttering threats.

EXAMPLE IV: WEAK ONBOARDING, FRAGMENTED VERIFICATION FUELS SHADOW FLEETS, ACCOUNT FARMS, AND NON-COMPLIANT VEHICLES

Fraud, “shadow fleets” scaling across Ontario: weak onboarding and fragmented identity controls enable fraud rings and “shadow fleets”—drivers who do not match profiles, vehicles operating outside inspection/insurance baselines, and scalable misuse.



VICTIM DETAILS: Riders/public who rely on app-dispatched rides. Legitimate drivers/operators harmed by fraud rings and “shadow fleets” that undercut compliant service.

APP IDENTITY FAILURES ENABLE WIDESPREAD CRIMINAL MISUSE.

- Weak identity controls: quick selfie/ID uploads can be gamed, enabling fabricated profiles.
- Software hacks: App. easily copied, accessed via older versions
- Scalable fraud: Account farms. ID rings create hundreds of bogus accounts, so the person who shows up may not match the in-app profile

- “Not fit” vehicles/drivers: passengers can be carried in vehicles that don’t meet standards (licensing, inspection, insurance, criminal-record/sex-offender screening)







CRIMINAL CHARGES:

- Identity fraud
- Money laundering
- Insurance breaches
- Licensing breaches
- Illicit activity (e.g., movement of drugs/cash/weapons “under the radar” across the city)

EXAMPLE V: ACCESSIBILITY AS OPTIONAL, EQUALS NON-VERIFIABLE WAV CAPABILITY WHICH ENABLES DISABILITY DISCRIMINATION

Accessibility becomes optional (WAV not verifiable/enforceable): When Wheelchair Accessible Vehicle(WAV) capability and service obligations are not consistently verified and measurable across operators, accessible mobility becomes discretionary rather than guaranteed.

DISABILITY RIDERS: ILLUSTRATIVE ONTARIO SCENARIOS

<p> Person 1 – Wheelchair User (Service Excluded)</p> <p>VICTIM DETAILS: Person using a wheelchair trying to reach a medical appointment (time-sensitive).</p> <p>US-APP FAILURE: US-app does not provide service.</p> <p>DISCRIMINATION: Adverse-effect discrimination: excludes wheelchair users when WAV supply is inadequate and cancellations aren't tracked/penalized on the operator side. The burden of failure falls on the disabled rider (missed care, lost time, unsafe waiting).</p> 	<p> Person 2 – Service Dog User (Service Cancelled on Arrival, Hidden Fees)</p> <p>VICTIM DETAILS: Person traveling with a trained service dog (blind/low vision, autism, or other disability), attempting routine travel (work/school).</p> <p>CURBSIDE FAILURE: Driver arrives, sees the service dog, refuses the trip, and waits for the passenger to cancel (or drives off). The app may apply cancellation fees or time penalties to the rider.</p> <p>DISCRIMINATION: Direct discrimination (refusal of service animal) + procedural discrimination (app design shifting responsibility and financial penalties onto the disabled rider). The platform's workflows can enable avoidance (no meaningful consequence for refusal) while the rider pays and is delayed.</p> 	<p> Person 3 – Mobility-Impaired Rider ("Wait Time" Charges, or Hidden Fees)</p> <p>VICTIM DETAILS: A rider with a mobility disability (e.g., uses a walker, cane, or has limited balance) leaving a hospital/clinic. They need extra time to safely get to the curb, fold a mobility aid, and enter the vehicle.</p> <p>CURBSIDE FAILURE: The driver arrives and the in-app wait timer starts immediately. The rider is moving as quickly as safely possible, but before they can board (or stow the walker), the driver cancels or the rider is hit with "wait time" charges. The rider is left stranded and must rebook—sometimes repeatedly.</p> <p>DISCRIMINATION: A disability-linked fee/penalty and failure to reasonably modify service for disability-related boarding time—i.e., charging a "wait time" fee (or triggering cancellation consequences) because the passenger, due to disability, needs more than a short default window to board. This is the core fact pattern in the U.S. Department of Justice case United States v. Uber Technologies, Inc. challenging Uber's "wait time" fee policy for riders who, because of disability, need more time to get into the car (Settlement announced July 18, 2022).</p> 
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PERSON 1 — WHEELCHAIR USER (SERVICE EXCLUDED)

Adverse-effect discrimination: excludes wheelchair users when WAV supply is inadequate and cancellations aren't tracked/penalized on the operator side. The burden of failure falls on the disabled rider (missed care, lost time, unsafe waiting).

PERSON 2 — SERVICE DOG USER (SERVICE CANCELLED ON ARRIVAL, HIDDEN FEES)

Direct discrimination (refusal of service animal) + procedural discrimination (app design shifting responsibility and financial penalties onto the disabled rider). The platform's workflows can enable avoidance (no meaningful consequence for refusal) while the rider pays and is delayed.

PERSON 3 — MOBILITY-IMPAIRED RIDER ("WAIT TIME" CHARGES, OR HIDDEN FEES)

A disability-linked fee/penalty and failure to reasonably modify service for disability-related boarding time—i.e., charging a "wait time" fee (or triggering cancellation consequences) because the passenger, due to disability, needs more than a short default window to board. This is the core fact pattern in the U.S. Department of Justice case **United States v. Uber Technologies, Inc.** challenging Uber's "wait time" fee policy for riders who, because of disability, need more time to get into the car (Settlement announced July 18, 2022)

EXAMPLE VI: WEAK IDENTIFICATION ALLOWS FOR UBER TO EVADE MARGINAL CATEGORIES

Antisemitic treatment of Jewish passengers in Uber rides reported in late 2025, led to the creation of a GTA-based private passenger transportation service positioned as a safer option for Jewish riders.



VICTIM DETAILS: Multiple Jewish women/young men report that Uber drivers refused to take them, or their families, after hearing them speak Hebrew, or ordered them out of their cars mid-ride after hearing them discussing trips to Israel, or asking them if they were Jewish, removing their luggage and leaving them stranded 'late-at-night'. Victims were told by Uber drivers that: "they don't drive Jewish people".

APP FAILURES. Non-discrimination policy failure at point-of-service (ride refused based on perceived Jewish identity/language). **No immediate protection:** rider ejected mid-ride with limited immediate protection. **Opaque remedy/enforcement transparency:** victims report following incidents Uber provided a small refund/credit, but not transparency with respect to driver action, or public accountability beyond that.

CRIMINAL CHARGES: No criminal charges reported. In connection with the ride-refusal incident itself, it was described as discrimination/service denial handled through Uber's process and public/media scrutiny. Victims reported once details became public they received online death threats, and incidents are being investigated by the Toronto police.