

TODD PARK

Administrator

DEPARTMENT OF BUSINESS AND INDUSTRY TAXICAB AUTHORITY

MINUTES OF THE JULY 16, 2025 BOARD MEETING

1. Call to Order

Chair Dan Reaser called the regularly scheduled monthly meeting of the Nevada Taxicab Authority Board to order at 9:30 am. The meeting was held at 3300 W. Sahara Avenue, Suite 400, Las Vegas, Nevada.

Board Members Present:

- Chair Dan Reaser
- Member JD Decker
- Member Vazquez
- Matthew Feeley, Deputy Attorney General

Board Members Absent:

- Member Weekly (status unknown at time of call to order)
- Member Graf (excused due to a scheduling conflict)

Taxicab Authority Members:

- Todd Park, Administrator
- · Lona Webb, Attorney

2. Public Comment

Chair Reaser opened the floor for public comment. No comments were offered by attendees in Las Vegas or remote participants.

Comment Received:

Kimberly Maxson-Rushton (with the law firm of Cooper Levenson) addressed the Board to welcome and congratulate newly appointed NTA Commissioner Teti. She commended his familiarity with the agency and expressed confidence in his leadership.

No additional public comment was offered from attendees in Las Vegas or online. Public Comment Session 1 was closed.

3. Approve Board Meeting Minutes from June 18, 2025, Board Meeting - (For Possible Action)

The minutes of the June 18, 2025 meeting were presented for review.

Motion to approve by: Member Decker. Seconded by: Member Vazquez. Motion passed.

4. Industry Discussion (For Discussion Only)

The floor was opened for members of the taxicab industry to bring forward comments, concerns, or observations.

Comment by Michael Bailin (Yellow Checker Star, New Cab Company Units 1, 2, 3, and 4):

- Mr. Bailin expressed concerns from drivers regarding the implementation of new special service procedures at the airport.
- He noted that drivers are now interpreting the order to mean that special service vehicles may bypass standard staging and go directly to the loading area, resulting in disproportionately high usage of these vehicles and an imbalance in citywide service.
- Historically, a more structured rotation process ensured fairness and coverage across regions.

Board and Administrator Discussion:

- Chair Reaser and Administrator Todd Park acknowledged the concerns, noting similar complaints had been received.
- Mr. Park explained that logistical limitations, including limited staff and the chaotic nature of the airport staging area, contribute to enforcement challenges.
- Collaboration with airport staff has occurred, but enforcement ultimately rests with the Taxicab Authority.
- Mr. Park indicated he had been in communication with Chris Anderson via email regarding the issue and is exploring options for issuing clarifying language or supplemental guidance to ensure equitable practices.
- Both Mr. Bailin and Administrator Park emphasized the importance of fairness to all drivers and maintaining improved airport service without negatively affecting citywide availability.
- Chairman Reaser requested a follow-up report on progress at the next board meeting.

Comment by George Balaban (Desert Cab Company):

Mr. Balaban concerns regarding the ongoing issue of unauthorized for-hire vehicles, referred to as "UPT's", operating particularly in the downtown Las Vegas area.

- He stated that his company has been submitting video and photographic evidence daily to the Taxicab Authority (TA) showing individuals soliciting fares without proper licensing.
- He emphasized that the problem appears to be worsening and urged the Board to address the issue.

Administrator Response – Todd Park:

 Administrator Park acknowledged receipt of the materials submitted and thanked Mr. Balaban for the continued documentation.

- He noted that many of the reported incidents occur outside of regular enforcement hours due to staff limitations.
- Mr. Park explained that the agency had lost three enforcement positions the previous year, severely impacting coverage and enforcement capacity.

Discussion – Potential MOU with NTA:

- Chair Reaser and Administrator Park discussed efforts to coordinate with the Nevada Transportation Authority (NTA) to address the enforcement gap.
- Administrator Park indicated he is currently drafting a Memorandum of Understanding (MOU) that would facilitate joint enforcement activities with the NTA.
- The MOU is based in part on a previous agreement authored by Member Decker and is in early development stages.

Board Member JD Decker Commentary:

- Member Decker emphasized the urgency of addressing unauthorized operators (Ubers, Lyft's, or others operating illegally without permits) as a public safety issue.
- He stressed that the lack of proper identification and background checks increases the risk of criminal activity, including theft and assault.
- Decker argued that while staffing is a challenge for both agencies, coordinated enforcement would serve as a force multiplier.
- He highlighted that jurisdictional authority is not an insurmountable barrier, stating that other law enforcement agencies routinely cooperate and write into each other's courts.
- He advocated for increased partnership and undercover operations, noting that the TA has expressed willingness in the past but has yet to be formally engaged by the NTA.

Additional Commentary by Administrator Park:

- Administrator Park acknowledged the complexities involved in cross-agency enforcement due to procedural differences between courts and regulatory statutes, particularly under NAC Chapter 706.
- However, he affirmed his commitment to advancing the MOU in collaboration with Lona and other stakeholders to overcome administrative challenges.

Chairman Reaser Remarks:

- Chair Reaser supported the initiative and noted that while interagency MOUs can be difficult to craft, they are not impossible.
- He recognized the seriousness of the issue and the need for a practical enforcement solution that prioritizes public safety and fairness to legitimate drivers.

Board Member JD Decker Remarks:

Member Decker emphasized that the issue of unauthorized for-hire vehicles (UPTs) extends beyond the jurisdiction of the Taxicab Authority (TA) and the Nevada Transportation Authority (NTA), identifying it as a broader law enforcement and public safety concern.

- He suggested a more global approach, potentially involving the Las Vegas Metropolitan Police Department (LVMPD), other law enforcement entities, and possibly intervention from the Governor's Office.
- Member Decker proposed coordination through a strike force or multi-agency enforcement effort, emphasizing that violations of DMV rules, criminal activity, and public endangerment are occurring.

- A motion to grant the application for intervention was moved and seconded, and the motion carried unanimously.
- The intervention was officially granted.

Procedural Compliance:

- Administrator Park confirmed that the procedural requirements for adoption of the manual had been met, including:
 - Proper public notice of the hearing.
 - Availability of the proposed manual for at least 20 days prior to the hearing.

Substance of the Manual:

- The manual reintroduces the provisions previously codified in the NAC without substantive change, except for two updates:
 - At the request of Mr. Mike Malloy, the capitalization threshold for assets was revised from \$100 to \$5,000 in two specific sections.
 - This change was noticed and included in the version provided to the public and board members.

Clarification and Use of the Manual:

- The manual is intended to serve as a regulatory reference for certificate holders and for the authority, and reimplementation allows for streamlined future revisions.
- Administrator Park noted that the adoption of the manual under a temporary regulation permits
 public discussion on future refinements and enables conversion into a permanent regulation in due
 course.

Intervenor's Statement:

- Mike Malloy, representing ACAB Taxi as General Manager, addressed the Board and withdrew the intervention, clarifying that his intent was solely to provide input and was unaware public comment would otherwise be allowed.
- The Board accepted the withdrawal without objection.

Clarification on Workshops vs. Comment Process:

Chair Reaser clarified that while the term "workshop" suggests formal rulemaking under Nevada Administrative Procedure Act, this matter is not subject to workshops. Instead, the Uniform System of Accounts Manual may be amended under the new regulation through administrator-led review and public input.

 The intent behind transitioning the accounting rules into a manual (rather than regulation) was to allow for greater flexibility in making technical updates without undergoing a formal rulemaking process.

Discussion on Fixed Asset Threshold:

 Mike Malloy from ACAB Taxi clarified that the updated manual had inconsistent references regarding fixed asset thresholds—some places listed the amount as \$100, while others properly reflected the revised \$5,000 standard.

- Administrator Park confirmed that the intent was to raise all fixed asset reporting thresholds to \$5,000.
- The conflicting references were located in:
 - Section 59
 - Section 89.11

Board Deliberation:

- Administrator Park welcomed an email submission from Mr. Malloy for clarity.
- Chair Reaser inquired whether a broader manual review had been conducted to ensure no additional \$100 thresholds remained.
- While a full search had not yet been completed, the board expressed consensus that uniformity was preferred and that no valid reason existed to retain the \$100 threshold.

Board Action:

Chair Reaser recommended adoption of the manual as noticed and published, with the amendment that:

All references to fixed assets listed at a \$100 threshold be updated to \$5,000, including but not limited to Section 59 and Section 89.11.

Motion: Made to adopt the Uniform System of Accounts Manual as amended. Second. Vote: Motion carried unanimously.

Closing Remarks on the Manual:

Chair Reaser encouraged both industry and staff to collaborate on streamlining the manual in future updates, to eliminate unnecessary or outdated provisions, particularly those that may no longer align with modern Generally Accepted Accounting Principles (GAAP). *Item closed.*

7. Public Hearing—Application for a Pilot Program by Whittlesea Blue Cab and Henderson Taxi. The pilot program will allow a passenger using a technology network company's app to connect to a taxicab driven by a Taxicab Authority permitted driver with all operational and insurance obligations mandated by NRS Chapter 706 required for those services. (For Discussion and Possible Action)

The hearing will be conducted pursuant to NRS Chapter 223B, NRS 706.8818, NRS 706.8819, NAC 706.471, NAC 706.876, and NAC 706.924, and is expected to involve discussion of, but is not limited to NRS Chapter 706 and NAC Chapter 706 generally, and any other relevant statutes and regulations.

The Board opened a public hearing on an application for a pilot program submitted by Whittlesea, Blue Cab and Henderson Taxi.

• The program would allow passengers using a TNC (Transportation Network Company) app to connect with a vehicle operated by a driver permitted by the Taxicab Authority, while ensuring all regulatory obligations—such as insurance and operations—are met.

Application and Intervention Notices:

The record reflects the following timeline and filings:

Application filed: June 6, 2025 by Whittlesea, Blue Cab and Henderson Taxi

- Petitions for Leave to Intervene:
 - Virgin Valley Taxi filed June 30, 2025
 - Desert Cab filed June 30, 2025
 - Curb Mobility filed July 1, 2025
 - Nevada Yellow Checker Star Corporation, New Cab, Taxi Management LLC filed July 2, 2025
 - ACAB Series LLC filed July 3, 2025
 - Duplicate intervention from Nevada Yellow Checker Star Corporation, et al. filed July
 7, 2025
 - Lucky Cab, Western Cab, and Nellis Cab Company filed June 7, 2025

Note: A clarification was requested regarding the duplicate filings by Nevada Yellow Checker Star Corporation, which appeared substantively identical.

Intervention Petitions:

Chair Reaser confirmed that all petitions to intervene in this matter were timely filed as follows:

- Virgin Valley Taxi June 30, 2025
- Desert Cab June 30, 2025
- Curb Mobility July 1, 2025
- Nevada Yellow Checker Star Corporation, New Cab, Taxi Management LLC July 2, 2025
- ACAB Series LLC July 3, 2025
- Nevada Yellow Checker Star Corporation, et al. (duplicate filing) July 7, 2025
- Lucky Cab, Western Cab, and Nellis Cab Company July 7, 2025

All filings were deemed timely.

- Motion: To grant all petitions for intervention as stated on the record.
- Seconded
- Vote: Motion carried unanimously. All petitions were granted.

Applicant Presentation:

Kimberly Maxson-Rushton, attorney with Cooper Levenson, appeared on behalf of Z-Trip, the operator of Whittlesea Blue Cab and Henderson Taxi. She was joined by William George, owner and president of Z-Trip.

Ms. Maxson-Rushton began by reminding the Board of its prior approval of the sale and transfer of these companies in 2024 and Mr. George's commitment to innovation in the taxicab industry. She summarized the application as follows:

- The pilot program would permit taxi companies to accept hail-dispatch rides through a TNC (Transportation Network Company) application.
- Once accepted, all rides would be treated and governed as taxicab rides, similar to current credit card transactions processed within cabs.
- The TNC platform would facilitate fare collection and distribution back to the company, which in turn would:
 - Remit taxes
 - Pay drivers their commissions
 - Process applicable regulatory fees (including remittances to the Taxicab Authority)

Note on Recordkeeping and Technical Interruption: During the presentation, audio/recording equipment malfunctioned temporarily.

- Ms. Maxson-Rushton agreed to submit her remarks in writing to ensure completeness of the official record.
- Chair Reaser confirmed that the record would reflect this submission and that minutes should capture the intent and content as stated when drafting.

Presentation by William George, President of Z-Trip:

Mr. George addressed the Board and provided the following remarks:

- Las Vegas marked Z-Trip's 38th operational city; expansion to Clearwater, Florida is scheduled for August 1, 2025, bringing the total to 39 cities, with 2 additional markets planned by year's end.
- Z-Trip operates approximately 4,000 vehicles nationwide.
- In each market since 2018, Z-Trip has reversed the decline in taxi trip volume, which had previously dropped following the rise of TNCs like Uber and Lyft in 2014–2015.
- These improvements have been achieved through:
 - Strategic marketing
 - Targeted partnerships
 - Investment in modern technology

Mr. George shared that:

- Z-Trip has had a team of 12 personnel in Las Vegas for the past 9 days, fully upgrading the company's technology platform in collaboration with Administrator Park and his team.
- The new platform enables expanded service capacity and the ability to recapture market share lost to TNCs, with a specific emphasis on integrating Uber into a pilot program to connect passengers with TApermitted drivers.

Mr. George provided an extensive overview of the proposed pilot program, highlighting the following key points:

Past Experience and Success in Other Cities:

- The pilot model has already been implemented successfully in six other U.S. cities.
- Examples include:
 - Jacksonville: ~80–100 new trips per day
 - Dallas: up to 400 new trips per day
- In Las Vegas, projections estimate 2,000 to 3,000 net new daily trips if multiple taxicab companies participate.

How the Pilot Program Works:

- Z-Trip's upgraded technology integrates directly with Uber's app.
- o Participating taxicab drivers will appear in the UberX pool.
- Riders receive a fixed upfront fare quote using Uber's dynamic pricing algorithm, as is typical for TNC services.
- o If matched with a taxicab, the trip is dispatched and fulfilled as a fully regulated taxi ride, and Uber collects the fare on behalf of the cab company.
- Drivers see the fare and trip details before accepting or declining. No penalties are incurred for rejecting trips.
- The taximeter will run in the background to allow auditing and comparison of flat fare vs. metered fare.
- All applicable fees, taxes, and commissions are processed and remitted appropriately to drivers, taxicab companies, and the Taxicab Authority.

• Consumer and Industry Benefits:

- Enhanced access for underserved communities in Las Vegas, especially residents outside of tourist zones.
- Expansion of service to residents needing transportation for work, school, or medical appointments.
- Increase in driver income potential due to more trip offers, including pick-ups from their home areas.
- o Reduction of "deadhead" miles (i.e., unoccupied trips).
- o Full transparency for passengers regarding pricing, vehicle type, and trip assignment.
- The program encourages increased adoption of wheelchair-accessible vehicles, which Uber and Lyft typically underperform on.
 - Z-Trip has already launched vans in Las Vegas, with high accessibility ratios in other cities (e.g., 50–60% of fleets in Nashville and Kansas City).

Pilot Purpose and Transparency:

- o The pilot is designed to collect operational data and identify benefits and challenges in real time.
- o Z-Trip will work closely with the Administrator and other stakeholders to monitor implementation.
- The pilot may inform future industry discussions on upfront pricing models and modernization of the fare system.

Z-Trip's Position on Industry Participation:

- Mr. George expressed a desire for all 3,500+ taxicabs in Las Vegas to eventually participate in the program for maximum benefit and efficiency.
- Uber supports the model because it ensures trip fulfillment; Uber is not concerned with whether a trip is fulfilled by a TNC or a cab.

Kimberly Maxson- Rushton concluded the affirmative presentation and would be happy any question.

Member Decker initiated a question:

Is the price that is set by Uber the same price that Uber would set for a TNC driver?

Mr. George's Response:

- He explained that Uber dynamically prices trips for the customer and sends the trip request to the nearest eligible vehicle—including taxicabs participating in the program.
- The price offered to the customer is set by Uber's platform, and drivers may accept or reject trips at their discretion.
- The background taximeter provides a parallel pricing record, allowing the Authority to track whether dynamic pricing exceeded or undercut the regulated metered rate.
- Uber's priority is ensuring trip fulfillment, not protecting TNC driver exclusivity, hence the inclusion of permitted taxicabs in their dispatch system.

Member Decker inquired about how Uber's dynamic pricing model which changes based on demand would comply with NAC 706.471, which vests fare-setting authority solely with the Taxicab Authority.

He posed a hypothetical: If Uber raises prices during high demand (e.g., from \$25 to \$50 for a TNC ride), why would Uber then allow the same trip to be fulfilled at a lower regulated taxicab rate?

Mr. George continued his presentation with further clarification on fare transparency and pricing mechanics:

Fare Transparency:

- Customers receive a fixed upfront price via the Uber app.
- Drivers see their portion of the fare before accepting the trip.
- Drivers may accept or decline any trip without penalty from Uber or Z-Trip.

• Compliance with NAC 706.471 (Fare Setting Authority):

- Mr. George explained that while the meter runs in the background, actual fare payment is based on the Uber-calculated fare. This may vary above or below metered rates depending on realtime demand.
- Z-Trip commits to providing monthly reports to the Taxicab Authority comparing metered fare vs.
 TNC fare, highlighting any deviations.
- This mechanism ensures that while a different pricing method is used, passenger consent and full transparency are preserved.

Member Decker:

- Expressed concern that NAC 706.471 restricts consumer fares, not internal driver compensation.
- Raised the question: If Uber sets a \$50 dynamic fare for a ride typically costing \$25 under meter rules, is Uber capturing the difference while the driver receives a lesser share?
- Noted potential conflict with the Board's exclusive authority to set or approve consumer rates for taxicab service.

Response by Kimberly Maxson-Rushton:

- Confirmed that the meter is not used to determine the fare under the pilot, but still runs to allow transparency and regulatory tracking.
- Clarified that the pilot seeks Board approval specifically to deviate from traditional meter-based rates as permitted under regulation.
- Emphasized the pilot includes safeguards:
 - The passenger sees and accepts the fare in advance.
 - The driver sees their earnings and accepts or declines.
- The deviation is similar in spirit to zone rates, previously approved by the Authority.
- Pilot data will inform whether further regulatory reform should be considered.

Member Decker:

- Pressed for clarification: Under the pilot, would Uber be collecting fares above the Board-regulated rates, effectively superseding the Authority's pricing control?
- Noted that a statutory deviation limit of 2% exists, but the pilot proposes fares potentially well beyond that threshold.

Mr. George's Response:

- Argued that the consumer protection intent of the regulation is still met because:
 - Riders knowingly accept the fare before the trip.
 - No hidden charges exist.
 - Transparency is greater than in traditional metered fares, which can be affected by unclear fees (e.g., fuel surcharge, airport fee, credit card fee).
- Reinforced that the model is not replacing metered rides, but offering an optional, alternative pricing model for those who choose to engage via the TNC app.
- The purpose of the pilot is to allow this deviation on a limited basis, gather real-world data, and report findings to the Board.

Consumer Protection Analogy:

- Mr. George compared the program to:
 - o Cruise port transportation packages, where the transportation fare is included in a larger travel package and set in advance.

- Third-party bookings, where the consumer knows the total fare but not necessarily the breakdown of each regulatory component.
- Noted that ride volume growth could benefit the Taxicab Authority's budget, and upfront pricing could improve consumer satisfaction and modernize industry perception.

Public Interest Justification:

- Pilot aims to:
 - o Increase trip volume through accessibility and convenience.
 - o Reduce idle miles and improve driver earnings.
 - o Serve underserved residential markets in Clark County.
 - Enable ADA-compliant vehicle service through Z-Trip's dedicated fleet (e.g., "Z-Triple" wheelchair vans).
- Highlighted potential appeal to younger travelers accustomed to TNC-style service models and price visibility.

Additional Remarks by William George (Z-Trip President):

Mr. George elaborated on the consumer perception benefits of the pilot, particularly in addressing "meter anxiety," a condition where passengers feel stress watching metered fares increase at stoplights or in traffic.

- Objective: Increase customer comfort with cabs by offering TNC-style pricing and booking convenience.
- Broader Impact: Enhance accessibility for the 3 million Clark County residents, not just tourists, by reintroducing cabs to residential areas through technology-based dispatch from drivers' homes.
- Fleet Flexibility: Riders still have the choice to call the company directly or use traditional taxicab apps to request a metered trip. Participation in the Uber-integrated program would be an additional booking option.

Member Decker (Cont.):

- Reiterated concern that NAC 706.471 mandates the Authority to set uniform rates charged to passengers, not merely what the driver or company earns.
- Questioned whether the pilot effectively delegates rate-setting to Uber, particularly during surge periods when Uber fares may exceed regulated zone or meter rates.

Request for Clarification from Administrator Park:

- Administrator Park confirmed that there is no daily inspection requirement enforced by the Authority prior to each vehicle entering service. Inspections are handled internally by companies and drivers.
- Park noted that additional insight may be available from the Deputy Attorney General who authored a memo on the matter, and that it would be more productive to allow Board questioning to continue before turning to legal interpretation.

Member Vazquez:

- Asked whether different vehicle types (e.g., Uber X vs. Uber XL) would be available through the pilot.
- Mr. George confirmed:
 - Standard taxis would be visible as Uber X rides (up to 4 passengers).
 - Minivans and wheelchair-accessible vehicles would qualify for Uber XL, providing greater capacity and luggage space.
 - Wheelchair vans could simultaneously fulfill standard, high-capacity, and ADA-accessible trip requests, increasing utilization.
 - Z-Trip recently deployed ADA vans in Las Vegas and has ordered 75 new wheelchair vans for use in other cities like Dallas.

Chair Reaser stated:

- Member Decker referenced NAC 706.471(3), which allows the Authority to deviate from uniform rates, fares, and charges upon a showing that such deviation is in the public interest.
- Chair posed a scenario:
 - Rider A exits the airport and takes a standard cab to a zone-priced destination (e.g., ABC Casino) and pays \$25.
 - Rider B uses Uber, is matched with a cab through the pilot program, and pays \$45 for the same destination.
 - Chairman questioned how do we square that with the fact that we've told the public a maximum they're supposed to pay to go to ABC casino under zone pricing?

Mr. George's Response:

- Acknowledged the issue and confirmed that the airport will be geofenced at the start of the pilot to avoid disrupting existing zone rate expectations.
- Stated that Z-Trip and Uber will work with the Taxicab Authority and airport officials over the following 60 days to determine optimal procedures for airport pickups.
- Some properties (e.g., certain Strip hotels) will also be geofenced due to first-in, first-out policies.

Primary Goal of the Pilot:

- Focus on residential neighborhood coverage, increasing availability and trip volume for Clark County residents.
- Use pilot data to:
 - Evaluate fare variance compared to regulated rates.
 - o Determine public benefit.
 - Adjust policy and geofencing protocols as needed.

Mr. George emphasized that:

- Riders and drivers both know the fare upfront—the passenger sees the quoted rate on the Uber app and the driver sees the payout amount before accepting.
- This satisfies key public interest principles: transparency, choice, and informed consent.
- Data from the pilot will help clarify and address unanswered operational and regulatory questions over time.
- Z-Trip intends to report findings and propose next steps within 60 days of implementation.

Chair Reaser:

- Asked for clarification regarding the duration of the pilot.
- Mr. George confirmed the pilot was intended to run for at least 60 days, with ongoing data sharing with the Administrator and a formal update to the Board at the conclusion of the period.

Discussion of Fleet Participation and Pilot Control:

- Mr. George acknowledged interest from other fleet operators in joining similar programs.
- Emphasized the need to control pilot scope to ensure valid data collection and avoid opening participation too broadly at the outset.
- Indicated that Z-Trip has shifted to its own technology platform, allowing greater control and integration for pilot evaluation.

Clarification on Fare Presentation and Zone Rates:

Chair Reaser and Member Decker Discussion:

- Expressed concern about fare discrepancy visibility in the cab.
- Example: A rider exits the airport and pays a zone fare of \$25 to ABC Casino; another rider uses Uber and is charged \$45 for the same ride in a cab via the pilot—these conflicts with the uniform zone pricing established and posted by the Authority.
- Chairman noted that a rider seeing a rate placard inside the taxi showing zone pricing may perceive conflicting fare information, creating consumer confusion and risk of unfair trade practice claims (NRS Chapter 598).

Mr. George Response:

- Uber and Z-Trip would geofence the airport at the pilot's outset to prevent violations of zone-based pricing until those logistics could be resolved in cooperation with the TA and airport authorities.
- Noted that similar geofencing can be applied to first-in, first-out hotel stands and other sensitive areas.
- Stated that most anticipated use cases for the pilot would originate in residential areas, where improved access to cabs is urgently needed.

Chair Reaser:

- Acknowledged transparency within the app, but questioned regulatory compliance under NAC 706.471(1), which vests exclusive rate-setting authority with the Taxicab Authority.
- Noted that under the pilot, Uber—not the Authority—would be setting the fare, thus potentially
 undermining the uniform rate mandate.
- Expressed concern that consumer signage inside the cab may contradict fare representations presented through the app.

Mr. George and Counsel Response:

- Asserted that consumer transparency occurs at point of transaction and thus meets public protection standards.
- Offered to install pilot-specific signage in vehicles to mitigate confusion between metered fares and app-based pilot fares.
- Noted that in thousands of pilot rides in other cities, no customer complaints have been received regarding pricing discrepancies due to clear upfront disclosure.

Legal Interpretation:

- Chair Reaser cited NAC 706.471(3), which allows deviation from uniform rates upon a showing that the public interest requires it.
- Emphasized the Board's statutory responsibility to ensure consumer protection, especially when pilot programs propose price deviations outside of metered or zone fares.
- Cautioned that failure to clearly delineate such exceptions in policy or signage could expose the Authority to liability under consumer protection statutes (e.g., NRS Chapter 598).

Mr. George:

- Reiterated that consumer choice, driver transparency, and enhanced availability all demonstrate a public interest benefit.
- Confirmed intent to return to the Board with pilot findings and recommendations in 60 days.

• Emphasized alignment with Z-Trip's broader strategy to reverse the steep industry decline in ridership—from 26 million to 12 million trips per year.

Closing Remarks by Applicant – William George (Z-Trip):

- Mr. George reaffirmed that the pilot ensures:
 - Consumer transparency: The rider knows the fare upfront.
 - o Driver transparency: The driver sees what they will earn before accepting.
 - Elimination of long-hauling: Since the fare is fixed and determined by the app, there is no incentive for unnecessary detours.
- He stressed that the pilot is designed to address concerns raised during the hearing and adapt based on findings.
- Z-Trip plans to return in 60 days to report data and propose next steps.
- The pilot will be monitored daily in cooperation with the Taxicab Authority (TA).

Kimberly Maxson-Rushton:

- Reinforced that the pilot:
 - o Reduces consumer cost variability by avoiding metered surcharges.
 - Removes driver incentive to long-haul.
 - Offers added benefits, including avoidance of separate credit card fees (which are integrated into the TNC app).
- Cited the success of a similar pilot in northern Nevada (Reno), where app-based taxi dispatch has expanded service into neighborhoods and decreased deadhead miles.
- Argued the pilot complies with NAC 706.471, particularly subsection 3, which allows for deviation from uniform rates when in the public interest.
- Asserted the program does not conflict with consumer protection laws, since fare transparency is preserved and multiple fare quotes are typical across commercial vehicle options.

Chair Reaser and Member Decker:

- Chair Reaser clarified that NAC 706.471(3) allows deviation from uniform rates, but subsection 1 still requires the Authority to set and control consumer fares.
- Decker noted that a Board-issued order citing public interest could allow the deviation but emphasized the need to preserve statutory authority to regulate rates, including within pilot programs.
- Jessica Guerra, Deputy Attorney General representing the TA, confirmed he assisted with drafting the related memorandum.
- Louis Csoka, Senior Deputy Attorney General for the NTA, appeared to answer any statutory or procedural questions.

Interveners Present:

- Athen Nebela Director of West Coast Business, Curb Mobility
- Ryan Awad Representative for Lucky, Western, and Nellis Cab
- George Balaban Desert Cab
- Mike Malloy ACAB Taxi

Athen Nebela (Curb Mobility):

- Expressed appreciation for the applicant's openness to making the pilot inclusive of the entire industry.
- Confirmed that Lucky, Western, and Nellis Cabs intend to submit their own pilot participation application.
- Affirmed that Curb Mobility has implemented similar programs in:

- o Reno
- New York City
- Los Angeles
- San Francisco
- Washington, D.C.
- Chicago
- Stated that results have been consistently positive, though nuanced by local geography.

Key Observations from Other Cities:

- TNC rides supplement, rather than replace, traditional taxi trips.
- Drivers benefit from additional trip volume, especially in slower shifts or non-peak hours.
- Distribution of vehicles throughout neighborhoods improves service access for call-ins and app-based taxi riders.
- Taxi fleets become more efficient and widely available, especially outside core tourist zones.

Ryan Awad:

- Emphasized the importance of reaching a tech-native generation who prefer app-based booking and fixed pricing.
- Noted that many passengers now expect silent, pre-determined service and are less likely to engage in traditional cab-hailing.
- The pilot enables the taxi industry to modernize and re-engage with this customer segment.

George Balaban (Desert Cab):

- Commended the innovative goals of the pilot program and expressed willingness to participate but raised several concerns:
 - o Insurance and liability risks: Stated that under the pilot model, Uber may route rides to cab drivers while avoiding primary liability, shifting the insurance burden to the taxicab company.
 - Rate disparity and dynamic pricing: Expressed discomfort with Uber setting fares that could significantly exceed or undercut metered rates for the same ride. He noted that this could lead to inconsistent pricing and undermine existing zone rates.
 - ADA service access concerns: Warned that customers needing wheelchair-accessible service may be forced to pay significantly more if routed through Uber rather than the direct cab dispatch system, creating potential equity issues.
 - DMC (Destination Management Company) abuse risk: Raised a hypothetical where DMCs or affiliated tech platforms could use pilot allowances to set flat fares (e.g., \$40) for high-volume event routes, bypassing the TA's regulatory control.
 - Loss of metered dispatch control: Voiced concern that the program could evolve into a scenario where cab companies cede pricing authority to third-party platforms, contrary to current regulatory structures.

General Concerns:

- The pilot may unintentionally create a two-tiered pricing environment, where customers calling the cab company directly are quoted metered rates, while customers using apps like Uber are charged dynamic fares — sometimes substantially higher.
- Highlighted the risk of customer dissatisfaction and reputational harm to the taxi industry if passengers discover they were charged significantly more through app-based booking for the same ride.
- Warned of driver behavior shifts e.g., refusing metered dispatch jobs in favor of higher-paying dynamic pricing jobs, which could erode traditional service models and hurt consumer access.

Mike Malloy (ACAB Taxi):

- Agreed that the pilot introduces potential benefits but cautioned about unintended consequences:
 - Recounted prior requests for fee flexibility (e.g., during EDC or Convention Center events) that were rejected or rescinded due to regulatory opposition.
 - Now, through the pilot, similar fee variances could become permissible under third-party dynamic pricing, bypassing the Authority's regulatory intent.

Call for Guardrails:

- Suggested that the pilot could benefit from:
 - Rate transparency signage inside vehicles, alerting passengers that posted cab rates do not apply when booked through a TNC.
 - o Pilot boundaries, including geofencing and caps on pricing deviation from metered fares.
 - Continued oversight by the Authority to avoid "backdoor deregulation" through platform-based dynamic pricing.

Chairman Reaser:

- Summarized core concern: While NAC 706.471(3) allows for deviation from uniformity, it does not
 appear to exempt the Board from its responsibility under subsection 1 to set the rates themselves.
- Emphasized concern that Uber not the Board is setting fares, which may be interpreted as a violation of the Authority's statutory obligations.

Member Decker:

• Voiced alignment with the Chairman's interpretation. Expressed need for careful legal analysis of whether the pilot can proceed without conflicting with NAC 706.471(1).

Deputy Attorneys General Present:

- Jessica Guerra, Deputy Attorney General (representing the TA)
- Louis Csoka, Senior Deputy Attorney General (representing the NTA)

Both appeared to assist with interpreting statutory boundaries in response to Board concerns.

Chairman Reaser:

• Prompted the Deputy AGs to respond to the legal dilemma: Is the Board over- or underestimating the regulatory risk involved in approving the pilot with respect to fare-setting authority?

Remote Participation and Continuation of Intervener Discussion

Chair Reaser reconvened the meeting following a break at approximately 11:51 AM. He noted that, as a matter of process, the record would reopen to allow any remote interveners to make additional comments. No further remote comments or requests to speak were received.

Board Member Decker then resumed questioning of the interveners.

Member Decker asked interveners George Balaban and Mike Malloy whether they believed the proposed 60-day pilot program should proceed despite their expressed concerns.

- Mr. George Balaban (Desert Cab): Acknowledged the need for a pilot to test the model and gather data but reiterated concerns over fairness and potential disadvantages to his company. He noted that while the pilot may benefit the industry in the long run, prolonged testing could negatively affect competition for drivers. He emphasized the importance of addressing the "dynamic pricing" dilemma and how it intersects with regulatory rate-setting obligations.
- **Mr. Mike Malloy (A Cab Taxi)**: Agreed with Mr. Balaban. He acknowledged that while the pilot could create temporary competitive disadvantages, it was necessary to determine viable long-term solutions. He expressed support for the pilot as a way to determine the appropriate guardrails and boundaries needed for successful integration.

Member Vazquez expressed interest in how the pilot could support international travelers accustomed to appbased ride-hailing and price transparency. He noted that tourists are more likely to use globally recognized apps like Uber rather than download local apps, which contributes to lost taxicab ridership in the Las Vegas market.

Mr. Bill George (applicant representative) provided clarifications:

- Confirmed that taxicab meters would not display pricing during Uber-sourced rides. Only the final fare
 accepted through the app would be shown, addressing prior concerns of consumer confusion over
 posted metered rates.
- Stated that the proposed system operates via an integrated tablet and is fully compatible with the Uber platform. He noted that some taxi companies, like Curb, already possess integrations with Uber, while others (e.g., Kabit) may not.
- Outlined the plan for a two-week pre-launch phase, involving 200–400 "friends and family" trips to identify bugs before full deployment.
- Reaffirmed the applicant's commitment to industry-wide collaboration, including coordination with fellow fleets on issues such as airport queues, hotel front-door access, and geofencing options.
- Asserted that in all other markets where this model has been tested, no consumer complaints were reported, and the effect has been net-positive due to increased trip volume and improved availability.

Kimberly Maxson-Rushton stated As the TA knows, Nevada law—specifically NRS 706 and 706A—sets forth a statutory framework that governs Transportation Network Companies (TNCs), including how they submit their rate structures to the NTA. While basic rates must be disclosed, the internal algorithms controlling additional surge pricing aren't fully transparent to the public, though the NTA does review how TNCs determine these rates.

By contrast, Destination Management Companies (DMCs) fall outside this regulatory oversight—neither the NTA nor the TA regulates their rates—so they can set higher charges without disclosure. In practice, we see that DMCs seldom raise vehicle prices to passengers, despite any existing NTA tariff.

Additionally, carriers like Kabit don't hold TNC permits, so they can't directly set or pass on rates to passengers under the TNC rate structure. This creates unique dispatch models and operational differences between DMCs and TNCs. Ultimately, both are regulated differently in Nevada.

The key point we've heard throughout today's discussion is: we won't know the real-world impact until we run a pilot. If required, we can present a full report in 30 days. Continuing to talk without action only hampers the industry's capacity to grow—and more importantly, to serve passengers who rely on TNC apps but aren't currently being reached.

Member Decker and Deputy Attorney General representatives clarified the following:

 While TNC rates are generally governed by NTA under NRS Chapter 706A, the algorithms used for dynamic pricing are not fully transparent, though base rate structures are submitted and reviewed.

- Destination Management Companies (DMCs) are not regulated in the same manner as TNCs, and in practice, often upcharge passengers significantly beyond the approved tariffs.
- Companies such as Cabot do not have TNC authority and therefore cannot legally establish rates directly charged to passengers under this model.
- This distinction underpins the importance of ensuring that any taxicab-TNC hybrid operations operate within existing statutory frameworks and do not create unintended Mr. Bill George reaffirmed that the pilot program cannot truly be evaluated or debated in theory alone, its success or failure hinges on real-world execution. He reiterated the applicant's willingness to report back to the Board within 30 days if necessary and stated that continued delay without implementation would harm both the Taxicab Authority and the broader industry. The pilot, he said, is ultimately about increasing access for riders who are currently committed to using TNC platforms.

Additional Industry Comment

A representative from Deluxe Cab confirmed that both Deluxe and Curb have Uber integration capability but are still completing administrative testing with Uber. He requested the Board allow additional time to complete integration so both companies can activate the system simultaneously. However, a precise timeline could not be provided, as the activation date remains at Uber's discretion.

Mr. Csoka (Deputy Attorney General, for the record):

- Stated that his comments reflect his personal legal opinion as the author of the memorandum and not an official statement on behalf of the Attorney General's Office.
- Clarified that, from a legal standpoint, the proposed pilot program can be conducted consistent with existing law, with the only potential conflict being NAC 706.471, which pertains to the Taxicab Authority's exclusive authority to set or adjust taxi rates.
- Referenced precedent where the Board approved higher taxi rates for special events, reinforcing the Board's discretion to deviate from standard rates when justified in the public interest.

Jessica Guerra (Deputy Attorney General assigned to the Taxicab Authority):

- Clarified that she was not waiving attorney-client privilege and was speaking under NRS Rules of Professional Conduct.
- Reiterated the Board's legal authority under **NAC 706.471(1)** to set or deviate from established rates but emphasized the importance of a clear justification that any deviation serves the public interest.
- Raised the legal question: If a TNC sets the fare visible to the customer, and then pays the taxi company a separate, non-tariffed rate, does this conflict with the Authority's obligation to control taxi rates?
- Stated that any approved rate deviation must still conform to the principles guiding the Board's prior rate proceedings: (1) what the rate is, (2) how it is justified, and (3) whether it meets the public interest.

Clarification by Mr. George:

- Explained that the TNC sets the customer-facing rate under the oversight of the NTA.
- Uber then offers a separate compensation rate to the taxi driver or company, which is not equivalent to the passenger fare due to Uber's service fees and cost structure.
- The driver retains the ability to accept or reject any trip offered through the Uber platform.

Board Member Decker's Summary:

Asked the Attorney General's Office directly whether the Board may legally approve the pilot program.
 Mr.Csoka responded affirmatively, though acknowledged the memo raised some reservation regarding surge pricing and its compatibility with NAC 706.471.

Further Clarifications from Ms. Guerra and Mr. Csoka:

- Emphasized that TNC rate filings with the NTA are for notice purposes, not active regulation like the taxicab industry.
- Confirmed that the taxi industry is subject to stricter regulatory standards than TNCs, aligning more closely with PUC-style ratemaking authority.
- Restated that the Board holds discretion under its enabling statutes to determine how to define and apply rate deviations during the pilot, provided that it serves the public interest and remains consistent with established regulatory frameworks.

Chair Reaser summarized the applicant's explanation of how drivers will evaluate the worth of each trip offered via the Uber integration. The system would track a comparison between the actual compensation received and what the fare would have been under a traditional taxi meter. This would provide valuable data to evaluate the pilot's impact. He also cited examples from other jurisdictions, including increased flexibility for drivers, especially in underserved areas and off-peak hours.

The Chair and members discussed key operational elements still needing clarification prior to full deployment, including:

- Coordination with existing taxi stand protocols at hotels and resorts.
- Clarification on the go-live timeline.
- Phased rollout including an internal "friends and family" testing period.
- Potential signage, geo-fencing, or airport coordination.

Mr. George (Z-Trip) stated that, if approved, the applicant would begin internal testing between July 21–24, 2025, running 200–400 trips, and would plan to go live to the public by August 1, 2025, contingent on final approval and Board conditions.

Ms. Guerra (Deputy Attorney General) reaffirmed the following:

- The Board has discretion under NAC 706.471 to deviate from tariffed rates in the public interest.
- However, the NAC does not currently accommodate ongoing, dynamic rate delegation to third parties (e.g., TNCs).
- Permanent implementation would likely require amendment to NAC 706.471, especially to prevent challenges from non-participating carriers or future applicants.

Mr. Csoka (Deputy AG) affirmed that a limited-duration pilot is legally permissible under current law, provided the Board defines the scope and duration clearly.

Member Decker voiced support for a short pilot to test the technology and evaluate driver behavior, though cautioned against the public forming expectations of long-term availability. He also believed the pilot should be limited to avoid undermining non-participating carriers.

Chair Reaser strongly supported innovation and stated the Authority has an obligation to help the industry remain competitive. He proposed:

- Approval of a pilot framework, with internal testing beginning in July.
- Formal launch to the public on September 1, 2025, after staff resolves key logistical and policy issues.
- o Pilot duration to be limited to 30 days (September 1–October 1, 2025).
- o Presentation of final logistics and compliance elements at the August 2025 meeting.
- Notification to the Governor's Office and Department of Business & Industry to ensure policy alignment.

Chair Reaser emphasized that this schedule would allow time to resolve operational concerns without unnecessary delay. He further noted that statutory and regulatory revisions may be needed for permanent adoption. Chair Reaser emphasized that the purpose of the proposed pilot is to test consumer behavior and operational integration of taxicabs dispatched through the Uber platform. He clarified that consumer notices—such as signage or digital screens in vehicles—are not intended to solve all issues, but rather to inform riders that standard Taxicab Authority metered rates do not apply to rides booked through the TNC app. Mr. George confirmed that all participating vehicles have in-vehicle technology capable of displaying such information clearly to passengers.

Member Decker reiterated his concern that any implementation involving the public must not begin until after the August 2025 meeting, when the Board has had the opportunity to review the results of pre-launch activities and verify that all compliance items are resolved.

Ms. Maxon-Rushton noted that the Z-Trip team has already performed extensive pre-coordination with the Taxicab Authority and multiple venues, including demonstrations of the technology and operational models, mirroring similar pilot efforts that have occurred in Northern Nevada without objection.

Discussion continued regarding NAC 706.471 and its implications. Counsel noted the regulation may not accommodate this type of program under its current language, and suggested the Board consider amending the regulation in the future to address this structural issue. ChaiR Reaser responded that regulatory changes could be considered after pilot data is reviewed.

Mr. George expressed concern about maintaining Uber's resource allocation to the Las Vegas market and urged timely approval. Chair Reaser responded that the Board must maintain its regulatory process and would not approve any live consumer implementation prior to the August meeting.

Motion by Member Decker:

To approve a 30-day pilot program integrating taxicabs into the Uber dispatch platform, to commence September 1 and conclude September 30, 2025, contingent upon the following compliance conditions being satisfied and formally presented to the Board at its August 2025 regular meeting:

- Agency consultation with the Governor's Office and Director of the Department of Business and Industry, and resolution of any governmental or political objections. The Administrator will report back on these consultations at the August meeting.
- 2. Development of consumer-facing information, including:
 - In-app disclosure regarding fare structures,
 - o In-cab notices (digital or physical) that metered rates do not apply to TNC-booked rides,
 - Signage at pick-up and drop-off locations (e.g., airports, casinos) during the pilot period.
- 3. Clarification of treatment by venues: The applicant will provide an explanation or plan for how participating venues (hotels, resorts, airports) will manage pilot-participating taxicabs as compared to both metered taxis and TNC vehicles.
- 4. Compliance item reports: The Administrator will verify and report that all compliance items are met prior to activation. Any issues unresolved by the August 2025 meeting will delay the pilot launch.
- 5. Internal two-week testing phase: While not required, the applicant may conduct internal prelaunch testing (e.g., "friends and family" trips) to ensure technological readiness and resolve operational bugs.

Chair Reaser concluded that the Board would await the Administrator's report and final compliance verification at the August 2025 meeting, at which time the Board will consider whether to authorize launch of the pilot on September 1, 2025.

Chair Reaser clarified that the purpose of consumer signage was not to gather consumer behavior data, but to ensure clear notice and transparency for riders. He emphasized that passengers must be informed—both inapp and in-vehicle—that standard Taxicab Authority rates do not apply when booking through a TNC platform like Uber. He suggested the use of temporary printed signage or screen displays within vehicles during the pilot period, similar to how surcharge notices are handled. This would help mitigate confusion and protect both consumers and the Authority.

Mr. George confirmed that Z-Trip vehicles are equipped with rear-seat display screens capable of conveying real-time fare and trip details and committed to incorporating language that makes it explicit when a trip is booked via the Uber app and does not fall under the standard meter rate.

Member Decker reiterated his opposition to launching the pilot with live consumers prior to the Board's August meeting, stating that the Board must first review all compliance items before allowing public implementation. He declined Mr. George's proposal for early live testing using a limited fleet and internal data collection.

Ms. Maxon-Rushton acknowledged that the Authority had worked with the applicant since 2020 on this integration concept and had reviewed comparable pilots in other markets, including Northern Nevada. She also addressed potential future regulatory conflicts with NAC 706.471, noting that broker fee caps or structural revisions may need to be considered if the pilot leads to permanent integration.

Chairman Reaser clarified that no rulemaking action would be initiated until after the pilot results are reviewed and the Board has evaluated potential regulatory changes. He emphasized that rate-making authority remains with the Board, and that all pilot-related activity must operate within the legal framework until such time that permanent revisions are deemed necessary.

Recommendation by Chair Reaser:

To approve a 30-day pilot program to integrate taxicabs with a TNC dispatch system (Uber), running from September 1 through September 30, 2025, contingent upon the following conditions being met and reported at the Board's August 2025 meeting:

- 1. Clearance of governmental objections: The Administrator shall consult with the Governor's Office and the Director of the Department of Business and Industry and report any objections or concerns to the Board in August.
- 2. Consumer-facing notifications must be finalized and presented to the Board, including:
 - In-app fare transparency language.
 - In-cab signage (digital or temporary physical) stating that *standard Taxicab Authority rates* do not apply to Uber-booked trips.
 - Signage at pickup and drop-off points (e.g., airports, casinos) to indicate the nature of the pilot and fare structure differences.
- 3. Venue coordination: The applicant shall provide a proposed approach or understanding of how major venues (hotels, resorts, airports) intend to handle pilot taxicabs operating under the Uber dispatch model, including how they will be distinguished or integrated relative to TNCs and standard taxi queues.
- 4. Clarification on zone pricing: The pilot must clearly indicate whether zone-based pricing is applicable or superseded by app-based dynamic pricing, and this must be communicated to consumers.
- 5. Internal testing optional: The previously discussed two-week internal testing phase may be omitted at the applicant's discretion, provided that justification is submitted and all other compliance conditions are met.

Moved and seconded; unanimously approved *Motion passed. Item closed.*

8. Continued fiscal discussion re the Taxicab Authority and the upcoming biennium 2026-2027, including action plan (For Discussion and Possible Action) Public Comment

Fiscal Year-End: The Year ended in June. Administrator highlighted continued month-overmonth drops in ride volume and revenue.

- Board Request: Due to two absent board members—one with keen interest in the statistics—the administrator was asked to prepare a cover memo, including:
 - Key metrics (rides, revenue, trends)
 - Comparative insights
 - Summary points
 - Support Needed: The Administrator will coordinate with Curtis Mell, management analyst, to compile and distribute the memo.

Item closed

9. Staff Report (For Discussion Only)

A. Administrator's Report

Fines and Budgetary Commentary:

- At Member Graf's request from the prior meeting, the Administrator agreed to include a comparative analysis of fine-related revenues in an upcoming memo.
- The Administrator clarified a previous error, confirming that fines are statutorily, not regulatorily, set.
- Fines currently contribute approximately 1–3% of the agency's overall budget and, while adjustable, would not significantly alter the agency's financial position.
- Industry Outlook: The Administrator noted observing multiple news articles and reports highlighting a broader decline in Las Vegas visitation and tourism, though the causes were not addressed in detail during the meeting.
- Operational Status: While medallion counts remained static, nearly every other operational metric showed a negative trend.

B. Stats

Ride Volume: Total rides for the month did not reach one million. This marks the second month in the current calendar year that ridership has dropped below that threshold.

C. Legal Counsel

None to report.

D. Future Agenda Items

None to report

10. Public Comment

Zev Kaplan

General Counsel, Taxi Management (representing Yellow Checker Star, New Cab):

- Mr. Kaplan urged the Authority to monitor and consider intervening in a pending application before the Nevada Transportation Authority (NTA) filed by Paradise Transportation, affiliated with The Boring Company.
- The application seeks approval for 102 vehicles to operate on the Las Vegas Strip and to the airport.
- Kaplan stated that industry representatives have been denied intervener status and encouraged the Taxicab Authority to raise concerns directly with the NTA, particularly regarding the proposed \$8 fare, which could materially impact resort corridor taxi service.

Jessica Guerra

Deputy Attorney General:

- Ms.Guerra announced she would be transitioning to a secondary DAG role for the Taxicab Authority, with Ryan Sunga resuming his role as primary DAG.
- Mr. Sunga previously served in this capacity and was welcomed back by the Administrator and board.
- The Administrator also recognized Adam Teti for his recent service to the agency and wished him continued success.

Remote Public Comment:

 The Board Secretary confirmed there were no additional public comments from participants attending remotely.
 Item closed

11. Adjournment (Action)

Chair Reaser request concurrence to adjourn; approved by voice vote. *Motion passed. Item closed.*

By the Authority,

Dan Reaser, Chair

Nevada Taxicab Authority

K. Kewer

Dated: August 20, 2025 Las Vegas, Nevada