



**Government of the Virgin Islands  
of the United States of America  
Department of Licensing and Consumer Affairs**

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**Horace Graham  
Assistant Commissioner**

**Testimony  
Before the  
35<sup>th</sup> Legislature of the Virgin Islands**

**Carla Joseph, Chair  
Committee on Government Operations, Veterans Affairs, and Consumer Protection**

**Bill 35-0251**

**September 24, 2024**

*"Serving Businesses & Assisting, Educating and Protecting Consumers"*

1 Good day, Honorable Senator Carla Joseph, Committee Chair, Committee on  
2 Government Operations, Veterans Affairs, and Consumer Protection, 35<sup>th</sup> Legislature of  
3 the Virgin Islands, committee Senators present, non-committee Senators present, and the  
4 listening and viewing audience.

5 My name is Horace Graham, Assistant Commissioner for the Department of  
6 Licensing and Consumer Affairs (hereinafter referred to as “DLCA”).

7 Thank you for providing DLCA with the opportunity to testify before the 35th  
8 Legislature on Bill 35-0251, an Act amending Title 3 Virgin Islands Code, Chapter 16  
9 Section 274 relating to the change of the name of the Virgin Islands Taxicab Commission  
10 to the Virgin Islands Taxicab and Limousine Commission and giving oversight authority  
11 to the Virgin Islands Taxicab and Limousine Commission over limousine services  
12 operators and for other related purposes.

13 While the legislation is well-intended, the DLCA has concerns regarding the  
14 proposed changes to rename the Virgin Islands Taxicab Commission (VITCC) and  
15 expand its oversight to include limousine services for the following reasons:

16 **The transportation industry is rapidly evolving**, and limousine service  
17 providers fill a niche that traditional taxi operations do not. These high-end transportation  
18 services are crucial for both residents and visitors seeking luxury or business travel  
19 options, often contractually arranged in advance. Presently, there are 65 licensed  
20 limousine service providers in the Virgin Islands. Compared to the vast array of taxi  
21 service providers this is just a drop in the bucket.

22           **Challenges Faced by the (VITCC).** The primary concern is the current capacity  
23 of the VITCC. The Commission is already facing significant operational challenges that  
24 could hinder the effective implementation of the proposed legislation. Specifically:

25           1.       **Staffing Limitations:** VITCC operates with only four employees across the  
26 territory, none of whom are located on St. John. This already limited staff struggles to  
27 meet the current needs, and expanding the scope to regulate limousine services would  
28 exacerbate these challenges.

29           2.       **Lack of Automation:** VITCC is not automated, leading to inefficiencies  
30 such as slow data processing, higher error rates, and a lack of timely responses to public  
31 inquiries. With the addition of oversight responsibilities for limousine services, these  
32 inefficiencies would only worsen.

33           3.       **Medallion Requirement:** Under current laws (20 VIC sec 407), all vehicles  
34 for hire must obtain a medallion. The proposed Bill introduces ambiguity, as it does not  
35 address the medallion requirement for limousines, which could create regulatory  
36 inconsistencies.

37           **DLCA's Role and Compliance with Law.** The Department of Licensing and  
38 Consumer Affairs currently oversees limousine services and ensures compliance with  
39 existing laws. As noted in the DLCA's guidelines, limousines are classified as luxury  
40 vehicles, including sedans, SUVs, and conversion vans, that must adhere to specific  
41 standards, including being luxury-class vehicles. Each limousine is inspected to ensure  
42 that safety and quality of the vehicle to be used in the service is guaranteed. Furthermore,  
43 we regularly update our recommendations to include the latest luxury editions of well-

44 known brands (such as Cadillac, Lincoln, Mercedes and Chevrolet,) which ensures that  
45 the vehicles in operation remain high-quality and appropriate for the intended clientele.

46 We are confident that under current licensing practices, limousine service  
47 operators are compliant with applicable laws. DLCA continues to work on comprehensive  
48 rulemaking to strengthen industry standards without overburdening operators with  
49 unnecessary regulatory hurdles.

50 **Concerns with Section J of the Proposed Bill.** Section J of the proposed bill  
51 introduces additional requirements such as a dress code and periodic drug testing for  
52 limousine operators. While drug testing is a prudent measure to ensure public safety, it is  
53 important to highlight that similar requirements are not in place for taxi operators.  
54 Imposing this on limousine operators alone seems inequitable and could place an undue  
55 burden on a sector that has consistently maintained high standards of service.  
56 Furthermore, existing DLCA vehicle regulations are already stringent enough to ensure  
57 safety and luxury without the need for additional oversight from VITCC.

58 Competition in this ever-changing transportation landscape is inevitable. The  
59 typical clientele for those engaging in limousine service operations are different from the  
60 daily commuter or casual traveller. We believe that limousine in its current configuration  
61 under the DLCA does not pose any significant harm to the operations of the Taxicab  
62 Commission. Adding this element to the taxicab commission will create additional  
63 regulatory burdens that may distract from the intended focus of the commission on  
64 providing ubiquitous and affordable transportation to the people of the Virgin Islands. A  
65 greater regulatory challenge at this time is at the door. Legislative consideration must be

66 immediately given to the ride share economy. This area of transportation is in need of  
67 immediate attention. If there is an area poised to transform the transportation landscape  
68 of the Virgin Islands and impact the taxi commission it is not the limousine service  
69 operations, it is the ride share economy. Many of our citizens have grown accustomed  
70 to this form of pervasive transportation service when they are abroad. We must give  
71 immediate consideration for the inclusion of this transportation modality. We must get  
72 ahead of the curve and provide urgent leadership and regulatory shaping for this aspect of  
73 the new Virgin Islands transportation economy. Failure to do so will inevitably be  
74 injurious to the present taxi regime.

75

76 In conclusion, while DLCA supports the intent to ensure quality and safety in the  
77 transportation sector, we believe that the current challenges facing the Virgin Islands  
78 Taxicab Commission, including its staffing shortages, lack of automation, and operational  
79 inefficiencies, make it inadvisable to expand its responsibilities at this time. DLCA is  
80 well-equipped and has the mechanisms in place to continue regulating limousine services  
81 effectively. Therefore, we recommend that the responsibility for limousine oversight  
82 remain with DLCA, while we continue to enhance our regulatory framework.

83

84 Thank you for the opportunity to present our testimony. We are prepared to answer  
85 any questions you may have.