



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

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October 24, 2025

The Honorable Avery L. Lewis
Chair, Committee on Government Operations, Veterans Affairs, and Consumer Protection
Thirty-Sixth Legislature of the Virgin Islands
P O. Box 1690
Capitol Building
Charlotte Amalie, VI 00801

Dear Senator Lewis:

Subject: *Evaluation of Administrative, Fiscal, and Statutory Nexus – Bill No. 36-0148
(An Act Amending Title 3 VIC, Chapter 16, § 274, to Mandate the Establishment of an
Electronic Monetary Payment System by the Virgin Islands Taxicab Commission)*

Thank you for your correspondence dated October 2, 2025, inviting the Department of Licensing and Consumer Affairs (DLCA) to appear before the Committee on Government Operations, Veterans Affairs, and Consumer Protection to provide testimony on Bill No. 36-0148. Unfortunately, due to scheduling conflicts, the DLCA is unable to appear before this Body today.

After a careful review of the measure and the relevant provisions of Virgin Islands law, the Department respectfully submits the following assessment:

Bill No. 36-0148 seeks to amend Title 3, VIC, Chapter 16, § 274, by adding a new sub§ (i) directing that "The Commission shall establish and operate an electronic monetary payment system and establish conditions and requirements for its use." The measure aims to modernize and streamline taxi operations through the introduction of digital payment options, thereby improving consumer convenience, enhancing transparency, and supporting the broader modernization of the Virgin Islands' transportation sector.

Under Title 3, VIC, Chapter 16, the Virgin Islands Taxicab Commission (VITCC) is established as an autonomous instrumentality of the Government of the Virgin Islands. It functions independently with its own governing board, executive director, and budget. The Department of Licensing and Consumer Affairs neither administers nor funds the operations of the Commission, and no statutory authority exists granting DLCA oversight or regulatory jurisdiction over its activities.

The DLCA's role in consumer protection, under Title 12A VIC §452(a), is broad and general. However, that authority does not extend to the establishment of electronic payment systems within that industry. The implementation, administration, and financing of any such system, as



contemplated under Bill No. 36-0148, fall entirely within the purview of the Virgin Islands Taxicab Commission.

Based on this review, the Department of Licensing and Consumer Affairs finds no administrative, fiscal, or statutory nexus to Bill No. 36-0148. The Department does not participate in the governance or operational activities of the VITCC and therefore has no direct role in implementing the provisions of this legislation. This amendment, however, will align with the requirements of Title 12A VIC §452(a), which mandates two forms of payment, bringing the VITCC clearly in line with the consumer protection and financial transparency intent of Title 12A VIC, §452(a).

We trust that this correspondence sufficiently clarifies the Department's position and offers assurance that DLCA has no objection to the proposed legislation, provided that the VITCC ensures appropriate safeguards for transparency, payment security, and consumer confidence as part of its implementation process.

Thank you for the opportunity to review and comment on this measure. Please do not hesitate to contact my office should the Committee require any additional information.

Respectfully submitted,



H. Nathalie Hodge
Commissioner

