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May 9, 2016

Mr. Mark Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110.

Re: Docket Number 17-81, Regarding Transportation Network Companies¹

Dear Secretary Marini:

On behalf of Associated Industries of Massachusetts (AIM) and the thousands of members which AIM represents; we write in support of effective and efficient regulations that will enable the ride for hire industry to thrive and grow in the Commonwealth while providing reasonable regulations. AIM supported the 2016 legislation that enabled the regulation of Transportation Network Companies (TNCs) in Massachusetts.

As the Department of Public Utilities continue the rulemaking process, AIM urges the department to share in the same goal, which is to allow these types of ideas and new approaches to providing services to advance with reasonable regulations. Since, Massachusetts is known for its innovation and creativity, our state laws, regulations and overall business climate must foster innovation or suffer the consequence of losing new technologies and new companies to other states more welcoming.

AIM urges the department to consider two key areas.

1. The current criminal offender record information laws and recently amended CORI regulations represent an important balance.

AIM has had longstanding involvement with policies impacting criminal offender record information (CORI) and employment laws impacting the hiring of individuals with criminal records in addition to workplace laws and policies.

In 2010 AIM was heavily engaged with the Patrick Administration and the legislature regarding CORI reform. AIM members from retailers, financial institutions, healthcare, manufacturing, distribution and educational institutions were focused on achieving CORI reform that maintained an acceptable balance between the need for employers to maintain safe workplaces and the desire of offenders to find jobs. Those conversations lead to a compromise legislative proposal and meaningful reforms.²

A similar balanced approach was taken by the Legislature in creating the background process for TNC's. We urge the Department to adhere closely to the background process set forth in the statute.

¹ <http://www.sec.state.ma.us/spr/sprpub/040717h.pdf>

² <http://blog.aimnet.org/AIM-IssueConnect/bid/42683/Proposed-Criminal-Records-Overhaul-Works-for-Massachusetts-Employers>

2. Executive Order 562 regarding regulatory reform

AIM's members believe that Massachusetts must provide smart, efficient, and cost effective regulations that support innovation. AIM have been heavily engaged in previous and current regulatory reform initiatives. AIM considers this an active and ongoing effort, where state agencies, business and others can continue to refine and adapt regulatory regimes.

AIM's Blueprint for the Next Century³ calls on policy leaders to address business cost, workforce training and two other key tenants that are important for the development of 17-81 regulating TNC's:

1. Support business formation and expansion by creating a uniformly competitive economic structure across all industries, geographic regions and populations, rather than picking winners and losers.
2. Establish a world-class state regulatory system that ensures the health and welfare of society in a manner that meets the highest standards of efficiency, predictability, transparency and responsiveness.

Please feel free to reach out to me directly at 617-262-1180 should you have any questions

Sincerely,



Bradley A. MacDougall
Vice President for Government Affairs

³ http://www.aimnet.org/userfiles/files/AIM_%20Blueprint%20for%20the%20Next%20Century_wb2.pdf