



Comments Received by the Department of
Consumer and Worker Protection on
Proposed Rules related to Contracted Delivery Workers

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Testimony of Daniel Ocampo

National Employment Law Project

In Support of Extending Minimum Pay Standard to Grocery Delivery Workers

Hearing before the New York City Department of Consumer and Worker Protection

New York, NY

December 8, 2025

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Testimony Before the Department of Consumer and Worker Protection:

My name is Daniel Ocampo, and I am a lawyer with the National Employment Law Project (NELP), a New York-based national nonprofit with more than fifty-five years of experience advocating for the labor and employment rights of low-wage workers. NELP works extensively at the federal, state and local levels, and regularly advocates for laws and regulations that protect workers in New York City.

I write today in strong support of DCWP's proposed rule to extend the city's minimum pay standard for third-party restaurant delivery workers to include grocery delivery workers. App-based grocery delivery workers for companies like Instacart and Shipt do essential work in New York City. They should be entitled to the same minimum pay standard that applies to app-based restaurant delivery workers.

App-Based Restaurant and Grocery Delivery Work are Substantially Similar, and Workers Should All Be Entitled to the Same Pay Floor

DCWP is entirely correct to apply its existing restaurant delivery worker pay standard to grocery delivery workers because app-based restaurant delivery work and app-based grocery delivery work are "substantially similar," as city law requires.¹

Like DoorDash and Uber, grocery delivery platforms like Instacart and Shipt direct the third-party delivery of food in New York City. While DoorDash and Uber Eats focus primarily (though not exclusively) on the delivery of restaurant meals, and Instacart focuses primarily on the delivery of groceries, that is the only real difference. All of these corporations use platforms to engage workers to transport food from commercial establishments across New York City to customers' doors. These workers navigate the same city streets and face the same traffic, weather, and safety conditions.

1. The Experience of the Work is Substantially Similar

From the workers' perspective, the daily experience is nearly identical. Both sets of workers can log into the platform and make themselves available online to take delivery requests. While many workers are in theory free to log in whenever they choose, in practice, to make a living, workers must log in during certain peak times from prime locations—whether that's near popular restaurants or large grocery stores. They must remain continuously attuned to the app for long periods, waiting in specific locations to fulfill orders quickly when requests come through. And the platforms' algorithms appear to function the same way, determining differential pay rates according to undisclosed factors.

Workers are expected to begin working immediately after accepting a trip request on the app, traveling to the pickup location, collecting the items (whether a prepared meal or groceries), and delivering them promptly to the customer. Like

¹ New York City Local Law 2025/124, Section 1 (see discussion below; where conditions of work are "substantially similar," the pay standards should be the same).

restaurant delivery workers before the pay standard, Instacart and Shipt workers are paid only for their “on-trip” time, not for their “on-call” time—meaning many of their actual working hours go unpaid.² Similarly, Instacart and Shipt workers must themselves cover the substantial costs of doing delivery work in New York (including buying and maintaining a car or e-bike, insurance, fuel, and other necessary equipment) and both rely heavily on customer tips to supplement inadequate base pay.³

2. The Workforce is Substantially Similar

The workforce is also essentially the same. These are primarily low-wage immigrant drivers, many from Latin America, West Africa, South Asia, and China, working long hours in challenging conditions to support themselves and their families.⁴ In fact, many of the workers who deliver meals for DoorDash and Uber Eats also do grocery delivery work for platforms like Instacart. In practice, the distinction between app-based restaurant delivery workers and app-based grocery delivery workers is thin; these are often the same people doing the same work for different platforms.

3. The Business Model is Substantially Similar

The business models of these companies are also, for the most part, the same. Both rely on an army of largely immigrant low-wage workers around the city being regularly available on their platform to fulfill orders. Both classify their workers as independent contractors, giving the companies the flexibility to avoid complying with basic labor and employment laws. Both use similar algorithmic management systems to control their workforce and to make sure they have adequate labor supply at any given time—dispatching workers, monitoring performance, setting pay, and maintaining control without providing employee benefits or protections. Both generate revenue by taking substantial commissions from merchants and fees from customers, while shifting the costs and risks of the work onto workers.⁵

Despite Instacart’s repeated protestations in its public communications, in its extensive lobbying campaign, and now in its filings in federal court, there is nothing unique about Instacart’s business model, and no special “flexibility” its workers enjoy.⁶

² For a further discussion of these terms and how compensation is structured for app based workers, see *A Minimum Pay Rate for App-Based Restaurant Delivery Workers in NYC*, N.Y. City Dept. of Consumer & Worker Protection, 18-20 (Nov. 2022), <https://www.nyc.gov/assets/dca/downloads/pdf/workers/Delivery-Worker-Study-November-2022.pdf>.

³ Id.

⁴ Id. at 12.

⁵ See, e.g., *Gridwise Gig Mobility Report, 2025*, available at <https://gridwise.io/analytics/2025-annual-gig-mobility-report/> (discussing the similar business models of gig delivery companies nationally).

⁶ See, e.g., Sophia Lebowitz, *Inside Instacart’s Astro-Turf Group Opposing Worker Minimum Wage*, Streetsblog (Aug. 5, 2025), <https://nyc.streetsblog.org/2025/08/05/inside-instacarts-astro-turf-group-opposing-worker-minimum-wage>; Dani Dudeck, *Op-Ed: NYC’s Grocery Delivery Workers Deserve \$21.44 an Hour—and the Flexibility to Earn It*, PoliticsNY (Sep. 8, 2025), <https://politicsny.com/2025/09/08/op-ed-nycs-grocery-delivery-workers->

The City Council Agreed, and the Law is Clear

The New York City Council could not have been more explicit in its determination that grocery delivery workers perform work that is “substantially similar” to food delivery workers and operate under “substantially similar” working conditions. Local Law 124 contains extensive legislative findings documenting these similarities, and concludes that “the method for calculating minimum payments for a food delivery worker set forth in section 7-810 of title 6 of the rules of the city of New York may be utilized to calculate minimum payments for a grocery delivery worker.”⁷ The proposed rule faithfully implements this legislative directive by applying the existing minimum pay calculation methodology to grocery delivery workers.

Only a Uniform Pay Floor Prevents Arbitrage Opportunities

The need for consistent regulation is particularly important given the current market reality. Platforms like DoorDash and Uber Eats, which are subject to the existing pay standard, are also offering grocery delivery services. Workers performing this exact same work for some companies currently receive minimum pay protections while workers doing identical work for other companies do not. This creates an arbitrage opportunity that allows platforms like Instacart and Shipt to offer the same services as their competitors while avoiding paying their workers a minimum wage, giving them an unfair competitive advantage and incentivizing a race to the bottom. Only a uniform delivery worker pay standard can remedy this.

To the Extent there are Differences in Working Conditions, they Counsel in Favor of a Higher Pay Standard for Grocery Delivery Workers

The only plausible basis for establishing differential pay standards Instacart has been able to articulate is the assertion that their workers primarily use cars.⁸ While comprehensive workforce data remains largely unavailable because platforms like Instacart refuse to make their extensive data holdings publicly available to researchers and regulators, available evidence suggests many New York City grocery delivery workers use e-bikes rather than cars.⁹ This makes intuitive sense: the grocery delivery market is focused in Manhattan, where delivery workers are much better able to navigate city streets and make deliveries on a bike rather than in a car, and riding an e-bike is much cheaper than driving a car in New York.

[deserve-21-44-an-hour-and-the-flexibility-to-earn-it/](#); Beth Wang, *Instacart Sues NYC Over Grocery Delivery Pay, Tipping Laws*, Bloomberg Law (Dec. 3, 2025), <https://news.bloomberglaw.com/payroll/instacart-sues-nyc-over-grocery-delivery-minimum-pay-standards>.

⁷ New York City Local Law 2025/124, Section 1.

⁸ See *Maplebear Inc. v. City of New York*, No. 1:25-cv-09979 (S.D.N.Y. Dec. 2, 2025) (complaint at 16).

⁹ Evidence gleamed from regularly seeing e-bike based delivery workers outside grocery stores in New York City, and from discussions with grocery delivery customers about their experiences using the platforms. See also, e.g., *A Minimum Pay Rate for App-Based Restaurant Delivery Workers in NYC*, N.Y. City Dept. of Consumer & Worker Protection (Nov. 2022).

Observational evidence at major grocery locations such as Wegmans in Astor Place confirms substantial numbers of e-bike delivery workers waiting for assignment.¹⁰

To the extent there are significant numbers of grocery delivery workers who do use cars, this difference is not material enough to justify setting a whole new pay standard. The work is still essentially the same; car-based delivery just involves higher expenses (the cost of purchasing and maintaining a vehicle, fuel, insurance, and parking costs) than bike or moped-based delivery does.¹¹ But the consequence of that is that this proposed pay standard, which includes an expense component based on lower-cost delivery methods, may undercount worker expenses for those doing car-based delivery—therefore setting a pay floor that is, if anything, too low. Instacart and Shipt's central argument for why they need a bespoke pay standard might actually support setting a higher wage floor for car-based delivery workers.

Moreover, car-based *restaurant* delivery—especially in the outer boroughs—is not uncommon. The Department is not required to set separate pay standards for e-bike delivery and for car-based delivery. But even if they did, it would not cut neatly across platform lines. This is ultimately one workforce operating as part of one app-based delivery economy. A large number of e-bike-based workers and a much smaller number of car-based delivery workers are, for the most part, working for the same platforms doing the same work. The regulatory framework should reflect this reality.

Instacart and Shipt Have No Principled Basis for Seeking an Exemption from the Minimum Pay Standard.

New York City is not generally required to set bespoke wage floors for workers in different industries. The minimum wage under federal, state, and city law is universal: all workers deserve to receive, at minimum, wages they can live on in New York City. The only reason separate standards are necessary for app-based workers is that the companies who profit from their labor classify them as independent contractors rather than employees, placing them outside the coverage of minimum wage laws.

DCWP's proposed minimum pay standard is meant to ensure that app-based grocery delivery workers make at least the minimum wage that applies to employees in New York. The thoroughness of the Department's study of the app-based delivery economy that produced the initial pay standard should be commended as an exercise in good policymaking, but it is not necessary to repeat this process for every subgroup of app-based workers.

App-based grocery delivery workers face the same cost of living as restaurant delivery workers. They have similar expenses for transportation and equipment.

¹⁰ Sophia Lebowitz & Olivia Bensimon, *The Instacart Loophole: Workers Are Not Covered by Minimum Wage*, Streetsblog (Nov. 14, 2024),

<https://nyc.streetsblog.org/2024/11/14/newly-arrived-migrants-delivering-groceries-not-covered-by-minimum-wage-nyc>.

¹¹ *A Minimum Pay Rate for App-Based Restaurant Delivery Workers in NYC*, N.Y. City Dept. of Consumer & Worker Protection, 18-20 (Nov. 2022),
<https://www.nyc.gov/assets/dca/downloads/pdf/workers/Delivery-Worker-Study-November-2022.pdf>.

They do the same kind of delivery work for the same companies—companies that have the same business model—and are paid in the same way. There is no principled basis for establishing different minimum compensation standards.

We therefore strongly support the proposed rule and urge DCWP to adopt it without delay.

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December 8, 2025

RE: Instacart Comments on Proposed Rules under Local Laws 123 and 124 (2025)

Ms. Vera Mayuga:

Thank you for the opportunity to comment on the Department's proposed rules under Local Laws number 123 and 124. While we appreciate your efforts to clarify certain parts of the local laws, we have serious concerns about your approach. The proposed rules would both impose needless compliance burdens and fail to carry out the local laws' intent. That is, the rules both go too far and do not go far enough.

Most troubling, the proposed rules fail to create a tailored pay standard for grocery-delivery workers. Though Local law 123 authorized the Department to adopt such a standard,¹ it chose instead to copy an existing standard without change. That standard was written for restaurant-delivery workers with data from the restaurant-delivery industry. It was crafted without data or input from grocery-industry stakeholders. It incorporates no data or feedback from grocery delivery platforms, grocery retailers, or grocery-delivery workers. It also fails to account for key differences between the two industries.

Rather than squeeze an ill-fitting standard on a brand-new industry, the Department should study the grocery-delivery industry first. The Department conducted just such a

¹ See Local Law 124 § 3 (2025) (codified at N.Y. City Admin. Code § 20-1522(e)).



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study before regulating restaurant delivery,² and there is no reason to exercise less care when regulating the food people prepare at home.

If the Department declines to study the industry before regulating it, the Department should at least adjust the standard to accommodate the differences for grocery-delivery platforms. The most important such adjustment is to eliminate the “aggregate” component to account for these services’ open-market models. The aggregate component accounts for “on-call” time. On-call time is the time a worker spends online waiting to receive a trip offer. While it is a common feature on major restaurant-delivery platforms, which match workers and jobs one at a time, it has no equivalent on open-market platforms. Open-market platforms, like Instacart’s platform, do not match workers and trips one to one; instead, they allow workers to browse a menu of available jobs at their leisure. That approach leaves workers with much more flexibility and control over their own time and schedules. It does not require “on-call” time, and therefore does not require an aggregate component. The aggregate component should be eliminated from the grocery-delivery standard.

The Department should also give newly regulated services a compliance runway. When the Department first implemented the restaurant-delivery standard, it delayed enforcement in three ways. First, it paused all enforcement for six months.³ Second, it delayed its “utilization” requirements for ten months.⁴ And third, it phased in the minimum-payment rate over two years.⁵ These delays were meant to give newly regulated companies

² See N.Y. City Dep’t of Consumer & Worker Protection, A Minimum Pay Rate for App-Based Restaurant Delivery Workers in NYC (2022), <https://www.nyc.gov/assets/dca/downloads/pdf/workers/Delivery-Worker-Study-November-2022.pdf> [hereinafter DCWP 2022 Study].

³ See Press Release, Mayor Adams Announces Full Minimum Pay Rate for App-Based Restaurant Delivery Workers Is Now in Effect, N.Y. City Office of the Mayor (April 1, 2025) (noting that the final standard was published in June 2023 but was not enforced until December 2023); *Food Delivery Worker Laws: Frequently Asked Questions*, N.Y. City Dep’t of Consumer & Worker Protection, <https://www.nyc.gov/site/dca/workers/workersrights/food-delivery-worker-laws-faqs.page#who> [hereinafter DCWP FAQ] (last visited Nov. 20, 2025) (same).

⁴ See 6 RCNY § 7-810(c)(1) (starting utilization requirements in April 2024). See also NYC Department of Consumer and Worker Protection, Notice of Adoption of Final Rule 33 (June 2023), <https://rules.cityofnewyork.us/wp-content/uploads/2023/06/DCWP-NOA-Minimum-Pay-for-Food-Delivery-Workers.pdf> [hereinafter Notice of Final Rule 2023] (same).

⁵ See 6 RCNY § 7-810(g)–(h); Notice of Final Rule 2023, *supra* note 4, at 34.



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time to adapt to the new requirements and improve their efficiencies—which, in turn, would lower costs for consumers.⁶

Those same concerns justify a compliance ramp-up now. Under Local Law 124, grocery-delivery platforms must adapt to a new regulatory system—again, one written for an entirely different industry.⁷ They must redesign their platforms and operations to fit a different model. They will need at least as much time to comply as restaurant-delivery platforms, if not more. And if they do not get it, consumers will face slower service, fewer retailers, and a degraded product—harm the Department could mitigate by simply following its own playbook.⁸

Finally, the Department should streamline the proposed recordkeeping rules. Many of these rules will be cumbersome if not impossible to implement. Worse, many of them will serve no purpose under local laws. While the Department has authority to adopt necessary and proper recordkeeping rules, it has no authority to force delivery platform services to keep records for recordkeeping's sake.⁹ These otiose, unjustified rules will only increase compliance costs and harm workers and consumers.

Again, thank you for the opportunity to comment on the proposed rules. We look forward to working with you as you refine the proposed rules and find a solution that works for all New Yorkers.

Instacart

Instacart's mission is to create a world where everyone has access to the food they love and more time to enjoy it together. We strongly believe that every family and every community should have equitable access to nutritious food and essentials.

⁶ See Notice of Final Rule 2023, *supra* note 4, at 11–12, 22.

⁷ See DCWP 2022 Study, *supra* note 2, at ii, 2–3 (describing sources of data for existing standard, all of which came from the restaurant-delivery industry).

⁸ See *id.* at 33–34 (projecting price increases resulting from the new pay standard and phasing in standard to allow delivery services to improve productivity “before bearing the full cost of the minimum pay rate”).

⁹ See N.Y. City Admin. Code § 20-1506(c) (authorizing DCWP to implement recordkeeping requirements by adopting “any rule necessary and appropriate”).



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Instacart is a proud member of the New York City community. Since 2014, Instacart has helped New Yorkers access groceries and other essential goods from their local retailers. Instacart now partners with more than 300 such retailers at 1,800 locations. It also reaches more than 98% of households living in urban food deserts.¹⁰ That reach is especially important in New York, where 1.2 million people are food insecure.¹¹

To connect people to their favorite food and retailers, Instacart partners with Instacart shoppers. Shoppers are independent professionals who offer personal shopping and other services through the Instacart platform. Overwhelmingly, shoppers choose the Instacart platform because of its flexibility. Shoppers can access the platform at virtually any time and from any place. Once online, shoppers can browse a menu of available opportunities—also called “batches.” Shoppers can review these batches at their leisure and select one if it meets their personal criteria (pay, item count, location, etc.). And if shoppers see no batches they want to accept, they can simply exit the platform and come back later.¹²

This model distinguishes Instacart’s platform from other kinds of digital platforms. While some platforms present opportunities to a worker one at a time,¹³ Instacart’s platform shows shoppers many available batches at once. It also does not require shoppers to decline a batch before reviewing a different one. Rather, it allows shoppers to browse batches from a menu available to multiple shoppers at once. This design makes the Instacart platform work more like an open market: any given shopper can review multiple batches, and any given batch can be reviewed by multiple shoppers. The platform minimizes restrictions and maximizes choice.¹⁴

¹⁰ See Instacart Economic Impact Report 12 (2025), <https://www.instacart.com/company/static/pdfs/2025-instacart-economic-impact-report.pdf>.

¹¹ See Office of the N.Y. State Comptroller, The Cost of Living in New York City: Food 5 (April 2025), https://www.osc.ny.gov/files/reports/osdc/pdf/report-2-2026.pdf?utm_source=substack&utm_medium=email [hereinafter Comptroller Cost of Living Report].

¹² See *How to Shop with Instacart*, Instacart, <https://www.instacart.com/company/shopper-101>.

¹³ See DCWP 2022 Study, *supra* note 2, at 15–16 (describing function of certain restaurant-delivery platforms).

¹⁴ See *Understanding the Shopper Community: A Report*, Instacart (June 8, 2023), <https://www.instacart.com/company/shopper-community/understanding-the-shopper-community-a->



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Regulatory Background

Local Law 115 (2021). Adopted in 2021, Local Law 115 directed the Department to study conditions in the restaurant-delivery industry and come up with a minimum-pay standard.¹⁵ To do that, the Department spent the next year collecting data. It subpoenaed records from third-party delivery platforms, surveyed delivery workers, and questioned restaurant operators.¹⁶ It then published a standard tailored for the restaurant-delivery industry's unique conditions, such as average worker costs and the predicted effect on restaurant prices.¹⁷

This standard also accounted for common features of restaurant-delivery platforms. For example, many of those platforms use one-to-one matching systems. That is, they offer a single trip to a single worker, one at a time.¹⁸ The worker must either accept the trip or reject it to receive a new one. The worker must also be in an active status on the platform to receive a trip offer at all. When designing the standard, the Department referred to the time a worker spends waiting for an offer as "on-call" time.¹⁹ It analogized on-call time to the time an employee spends "waiting to be engaged."²⁰ And based on that analogy, the Department decided that on-call time should be compensated.²¹

The Department aimed to do that by building in two components: an "individual" component and an "aggregate" component. The individual component requires a third-party delivery service to pay at least the minimum rate for all time a worker spends actively

[report](#) (reporting that 80% of shoppers use the Instacart platform for independence and 75% value its flexibility).

¹⁵ See Local Law 115 § (2021) (codified at N.Y. Admin. Code § 20-1522(a)(1)).

¹⁶ See DCWP 2022 Study, *supra* note 2, at ii, 2–5.

¹⁷ See *id.* at 32–35 (projecting effects on costs. See also Notice of Final Rule 2023, *supra* note 4, at 32–33 (codified as amended at 6 RCNY 7-810)).

¹⁸ See DCWP 2022 Study, *supra* note 2, at 15–16.

¹⁹ DCWP 2022 Study, *supra* note 2, at 32.

²⁰ *Id.* See also Notice of Final Rule 2023, *supra* note 4, at 5.

²¹ DCWP 2022 Study, *supra* note 2, at 32; Notice of Final Rule 2023, *supra* note 4, at 5.



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delivering an order.²² This time is referred to as “trip time.”²³ By contrast, the “aggregate” component requires the delivery service to pay all workers on its platform at least the minimum rate for all trip time and all on-call time.²⁴ Together, these components are supposed to encourage delivery platform services to minimize on-call time and maximize trip time.²⁵ They are also supposed to make sure that workers overall are compensated for whatever on-call time is still necessary.²⁶

The Department supplemented this two-component structure with an “alternative” standard. Under the alternative standard, a third-party delivery service can pay a minimum rate only for trip time.²⁷ But the service must also maintain a minimum “utilization” rate.²⁸ The utilization rate is the proportion of trip time as opposed to on-call time.²⁹ The minimum utilization rate is 53%.³⁰ That is, to use the alternative standard a delivery service must ensure that 53% of all worker time on its platform is trip time.³¹

These standards were phased in gradually. The final standard was published on June 12, 2023. It became effective a month later.³² The Department then waited for six months

²² 6 RCNY § 7-803(7).

²³ *Id.* § 7-810(b)(1).

²⁴ *Id.* § 7-810(b)(2).

²⁵ See DCWP 2022 Study, *supra* note 2, at 31–32.

²⁶ See *id.*

²⁷ 6 RCNY § 7-810(c)(2).

²⁸ *Id.* § 7-810(c)(1).

²⁹ *Id.* § 7-803(8).

³⁰ *Id.* § 810(c)(1).

³¹ See *id.*

³² See Notice of Final Rule 2023, *supra* note 4, at 3 (noting that initial minimum rate was to take effect 30 days after adoption). See also Mayor Adams, DCWP Commissioner Mayuga Announce Nation’s First Minimum Pay Rate for App-Based Restaurant Delivery Workers, N.Y. City Office of the Mayor (June 11, 2023), <https://www.nyc.gov/mayors-office/news/2023/06/mayor-adams-dcwp-commissioner-mayuga-nation-s-first-minimum-pay-rate-app-based> (stating that final rule would take effect on July 12, 2023).



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to start enforcing it.³³ From there, the pay rate took effect in graduated steps. The rate was initially set at \$17.96 per hour. In April 2024, it was raised to \$19.56. And in April 2025, it was raised to \$21.44 per hour.³⁴ The Department also delayed the “alternative” standard’s utilization requirement until April 2024 (about ten months from when the standard was adopted).³⁵

These delays were meant to give third-party food delivery services time to adjust. The services had to both redesign their platforms and improve their utilization rates. Those changes would take time. If they were rushed, they would create new costs and supply bottlenecks—harms that would flow down to workers and consumers. The Department recognized those risks and so took steps to avoid them.³⁶

Local Law 124 (2025). In 2025, over the veto of Mayor Adams, the City Council adopted Local Law 124. The law created a new category of regulated delivery service, “third-party grocery service.”³⁷ It required those services to “make payments to grocery delivery workers retained by such service that meet or exceed” the pay standard for restaurant-delivery workers.³⁸ It also gave the Department discretion to “establish a method for applying such minimum pay requirements to grocery delivery workers that is tailored to the circumstances of such workers, including variations in the working conditions of such workers as compared to the working conditions of [restaurant] delivery workers.”³⁹

³³ See DCWP FAQ, *supra* note 3.

³⁴ See Press Release, Mayor Adams Announces Full Minimum Pay Rate for App-Based Restaurant Delivery Workers Is Now in Effect, Office of the Mayor of New York City (April 1, 2025), <https://www.nyc.gov/mayors-office/news/2025/04/mayor-adams-full-minimum-pay-rate-app-based-restaurant-delivery-workers-now-in> (describing stepped pay increases).

³⁵ See Notice of Final Rule 2023, *supra* note 4, at 33 (codified at 6 RCNY § 7-810(c)(1)).

³⁶ See DCWP 2022 Study, *supra* note 2, at 33 (explaining that standard would be phased in to allow delivery services to adapt “before bearing the full cost of the minimum pay rate”).

³⁷ See Local Law 124 § 2 (2025) (codified at N.Y. Admin. Code § 20-1501).

³⁸ *Id.* § 3 (codified at N.Y. Admin. Code § 20-1522).

³⁹ *Id.*



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Local Law 123 (2025). At the same time, the Council adopted Local Law 123. Among other things, Local Law 123 requires any “delivery service” to follow new recordkeeping and disclosure rules.⁴⁰ In particular, for each trip in New York City, it requires a delivery service to give a contracted worker certain information: (1) the addresses where goods must be picked up and delivered; (2) the estimated time and distance from the first pickup location to the final drop-off location; (3) any gratuity offered by the customer; (4) compensation excluding gratuity; and (5) any other information that would help the worker decide whether to accept the offer or assignment.⁴¹ The Department was instructed to specify this last category by rule.⁴²

The proposed rules. Now, the proposed rules aim to implement these requirements. But as explained below, the rules both omit necessary features and include unnecessary ones; they both over- and underregulate. They should be revised and republished for additional public comment.

Needed Revisions

Study the industry. The rules’ biggest flaw is their lack of any tailored standard for grocery-delivery workers. Under Local Law 124, the City Council explicitly authorized the Department to adopt such a standard.⁴³ The Department knows how to write such a standard, as it showed in the nearly two-year process it followed for the restaurant-delivery industry.⁴⁴ It also has ample time to conduct a similar study now, as Local Law 124 sets no time limit on the Department’s process.⁴⁵ Yet rather than write a tailored standard, as the law explicitly contemplates, the Department decided to copy-and-paste the restaurant-delivery standard onto the grocery-delivery industry.

⁴⁰ See Local Law 123 § 1 (2025) (codified at N.Y. City Admin. Code §§ 20-1506, 20-1521(d)).

⁴¹ *Id.*

⁴² See *id.* (codified at N.Y. City Admin. Code §§ 20-1506(c), 20-1521(d)(5)).

⁴³ See Local Law 124 § 3 (2025) (codified at N.Y. City Admin. Code § 20-1522).

⁴⁴ See generally DCWP 2022 Study, *supra* note 2.

⁴⁵ See Local Law 124 § 3 (2025).



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That approach contradicts Local Law 124. The law explicitly contemplates that the Department will create a tailored standard. It states that the Department “may” adopt a tailored standard “by rule.”⁴⁶ While that language could be read as permissive, the best reading is mandatory. The language must be interpreted within the broader regulatory context; and that context contemplates that the Department will develop deliberative, data-driven standards. For both “food delivery workers” and “contract delivery workers,” the law directs the Department to study industry conditions before announcing a standard.⁴⁷ There is no reason to think the City Council expected the Department to do anything less for grocery-delivery workers.⁴⁸ So properly understood, Local Law 124’s language specifies *how* the Department will create the standard—“by rule”—not whether the Department should create a standard at all.⁴⁹

Indeed, Local Law 124 must be understood that way. If it merely left the decision to the Department’s discretion, it would be invalid. Under the New York City Charter, only the City Council can make fundamental policy choices.⁵⁰ The Council cannot delegate those choices to an agency. Whether to adopt a grocery pay standard is a paradigm policy choice: it represents a fundamental change in how a large and growing segment of workers are

⁴⁶ *Id.*

⁴⁷ See N.Y. City Admin. Code § 1522(a)(1), (f).

⁴⁸ Cf. N.Y. STAT. LAW § 96 (stating that statutes should be interpreted according to “the general spirit and purpose underlying its enactment”); N.Y. Stat. Law § 97 (stating that states should be read as a whole and interpreted together to determine legislative intent).

⁴⁹ See *Perle Tech. Inc. v. United Apollo Intl. Inc.*, 2025 N.Y. Slip Op. 32188(U) (Sup. Ct., Kings County June 10, 2025), available at https://www.nycourts.gov/reporter/pdfs/2025/2025_32188.pdf (concluding that arbitration was mandatory under contract even though contract used word “may” by examining contract as a whole to discern drafters’ intent).

⁵⁰ See N.Y. City Charter §§ 21, 28, 32.



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paid.⁵¹ So if Local Law 124 were interpreted to give that choice to the Department, it would unlawfully delegate legislative authority.⁵²

The Department should therefore interpret the law as mandatory.⁵³ It should study working conditions in the grocery-delivery industry. That study should be at least as thorough as the study the Department conducted in 2021 and 2022. And meanwhile, it should pause enforcement. Without accurate information about the grocery-delivery industry or its working conditions, the Department cannot know how a pay standard would affect the community. The only way to avoid collateral damage is to proceed carefully.

Eliminate the aggregate component. If the Department refuses to create a tailored standard, it should at least modify the existing standard to account for known differences between the industries. Most importantly, in the grocery-delivery platform industry, one-to-one offer models are uncommon. Much more common are open-market models, like the one used by Instacart's platform. Open-market models allow multiple workers to browse available trips at their leisure. Workers do not have to wait to receive an offer or assignment. So for those models, there is no equivalent to "on-call" time. And because there is no on-call time, there is no need for an "aggregate" component.

⁵¹ See Report of Committee on Consumer Affairs and Business Licensing, N.Y. City Council 4–7 (June 8, 2021) [hereinafter June 2021 Council Report] (surveying social and economic policy implications of working conditions in restaurant-delivery industry); Report of Committee on Consumer and Worker Protection, N.Y. City Council 5–9 (Dec. 9, 2024) (conducting similar analysis of policy implications of working conditions of contract delivery drivers).

⁵² See Greater N.Y. Taxi Ass'n v. N.Y. City Taxi & Limousine Comm'n, 36 N.E.3d 632, 637 (N.Y. 2015) (explaining that the legislature must provide "reasonable safeguards and guidelines" to guide agency discretion). See also New York Statewide Coal. of Hisp. Chambers of Com. v. N.Y. City Dep't of Health & Mental Hygiene, 23 N.Y.3d 681, 16 N.E.3d 538 (2014) (explaining that administrative agencies may not engage in policymaking beyond its regulatory function); Boreali v. Axelrod, 517 N.E.2d 1350, 1355–56 (N.Y. 1987) (same).

⁵³ If the Department continues to insist that the language is permissive, Instacart maintains that the law itself is an invalid delegation, as it has claimed in ongoing litigation in federal district court. Maplebear, Inc. v. City of New York, 1:25-cv-09979 (S.D.N.Y. Dec. 2, 2025)



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Again, in the restaurant-delivery standard, the aggregate component accounts for on-call time.⁵⁴ On-call time is the time when a worker is active on a platform and is waiting for a trip offer.⁵⁵ But there is no equivalent time on open-market platforms. On an open-market platform, a worker does not have to wait for an offer. The worker can log onto the platform and immediately see the available trips. She can do that at any time, from any place, without limitation. And she does not have to stay logged in to receive new trips; she can simply leave the platform and check back later. She can use her time as she sees fit.⁵⁶

Because there is no equivalent to on-call time, there is no need for the aggregate component. The aggregate component serves only one purpose, and that purpose is to capture on-call time.⁵⁷ So without on-call time, a pay standard can capture all work time simply by covering all trip time.⁵⁸ In other words, the individual component does all the necessary work.

Eliminating the aggregate component not only reflects differences between the industries; it also avoids unnecessary harms to workers. If the aggregate component were applied to open-market platforms, workers on these platforms would lose significant flexibility. The platforms would have to lock down access to reduce non-trip online time.⁵⁹

⁵⁴ See DCWP 2022 Study, *supra* note 2, at 31–32 (describing design of pay standard and purpose of aggregate requirement).

⁵⁵ See 6 RCNY § 7-801(4).

⁵⁶ See *How to Shop with Instacart*, *supra* note 12 (providing visual demonstration of shopper experience on Instacart’s platform).

⁵⁷ See DCWP 2022 Study, *supra* note 2, at 31–32.

⁵⁸ See *id.* at 31 (explaining that the standard’s goal is to compensate workers for all time they “spend working” while leaving delivery services with flexibility to determine “how they pay each worker”).

⁵⁹ See *id.* at 31, 35 (projecting that third-party delivery services would make “operational changes” that would restrict overall worker hours). See also Miranda Livingston, *Maximum Rage: Delivery Workers Protest Low Wages, App “Lockouts,”* Streetsblog NYC (March 28, 2024), <https://nyc.streetsblog.org/2024/03/28/maximum-rage-delivery-workers-protest-low-wages-app-lockouts> (reporting on protests by workers over “lockouts” resulting from operational changes made by regulated delivery services to minimize on-call time and increase utilization rates).



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Workers would therefore have fewer options and less access to work. Many would be forced to leave the industry entirely.⁶⁰

The effects of these changes can be seen in the Department's own data. When the Department imposed an aggregate component on restaurant-delivery platform services, the number of workers using those platforms fell in one year by 35%.⁶¹ Total hours likewise fell by 43%.⁶² So in just twelve months, 38,000 jobs vanished.⁶³

The effect would be even worse for grocery-delivery workers, most of whom use the platforms only part time. The workers most affected by access restrictions tend to be casual or part-time workers.⁶⁴ These workers use platforms as supplemental income.⁶⁵ They structure their work around school, family responsibilities, or other jobs. They tend to use platforms at inconsistent or nontraditional times and from a myriad of places; they work when and where they can.⁶⁶ But those times and places are also the same times and places affected by lockdowns. The aggregate component incentivizes platform operators to

⁶⁰ See NYC Department of Consumer and Worker Protection, Restaurant Delivery App Data (January–March 2024), <https://www.nyc.gov/assets/dca/downloads/pdf/workers/Restaurant-Delivery-App-Data-Q1-2024.pdf> (reporting 9% decrease in total number of workers on regulated platforms in a single quarter after standard went into effect, alongside a 14% decrease in total work hours).

⁶¹ NYC Department of Consumer and Worker Protection, Restaurant Delivery App Data (October–December 2024), <https://www.nyc.gov/assets/dca/downloads/pdf/workers/Restaurant-Delivery-App-Data-Q4-2024.pdf> [hereinafter DCWP Data Q4 2024].

⁶² *Id.*

⁶³ See *id.* See also Lisa Fickenscher, *NYC Food-Delivery Workers Losing Jobs After Minimum Wage Hike—Even As Menu Prices Soar: Report*, N.Y. Post

⁶⁴ See DCWP 2022 Study, *supra* note 2, at 36 (“The Department anticipates that the greatest adverse impacts from the rule for workers are likely to be the actions apps take to reduce platform access for workers whose time generates relatively little revenue or to alter requirements in ways some workers find undesirable. These impacts will be disproportionately felt by workers whose engagement on the apps is the most casual.”).

⁶⁵ See Instacart Economic Impact Report, *supra* note 10, at 18 (reporting that 70% of Instacart shoppers have multiple income streams).

⁶⁶ See *Understanding the Shopper Community*, *supra* note 14 (reporting that 70% of Instacart shoppers are women, 50% are caregivers, and 11% are college students). See also Public First, U.S. App-Based Rideshare & Delivery Economic Impact Report (2024), <https://www.flexassociation.org/wp-content/uploads/2024/03/Flex-Economic-Impact-Report-2024.pdf> (reporting that 90% of app-based workers reported that flexibility was an important reason to use rideshare and delivery platforms).



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restrict access when demand is lowest. So the workers who work at those times will be hurt the most.⁶⁷

These causal users are more common in the grocery industry. Instacart's data shows that 70% of shoppers have multiple jobs, and 50% have school-age children.⁶⁸ Three-quarters of them say that they use Instacart to shop because of its flexibility.⁶⁹ Similarly, the Department's own data suggests that workers who deliver with cars tend to work less frequently than those who use e-bikes.⁷⁰ And as the City itself recognizes, car delivery is more common in grocery than restaurant delivery.⁷¹

Grocery-delivery workers will also be harmed by a loss of tips. In the restaurant industry, the existing standard caused tipping income to plunge by 70% in one year.⁷² In the same period, tips per order fell by 53%.⁷³ So even as workers were completing 78% more deliveries per hour, their hourly tip income fell by 47%.⁷⁴

According to the Department's data, some of this lost income was offset by higher minimum pay.⁷⁵ But even so, the substitution of minimum pay for tips will still cost workers money. Under H.R. 1, the One Big Beautiful Bill Act, delivery workers can qualify for an

⁶⁷ See DCWP 2022 Study, *supra* note 2, at 36 (acknowledging that the standard was most likely to hurt more casual users the most).

⁶⁸ See Instacart Economic Impact Report, *supra* note 10, at 18.

⁶⁹ *Id.*

⁷⁰ See DCWP 2022 Study, *supra* note 2, at 14 (reporting that while workers who delivered with cars made up 43.9% of all workers, they accounted for only 30.6% of all hours and 22% of all deliveries).

⁷¹ See Local Law 124 § 1 (2025) (finding that “the frequency and necessity of the use of motor vehicles among grocery delivery workers may be higher than such use by food delivery workers”).

⁷² DCWP Data Q4 2024, *supra* note 61.

⁷³ *Id.*

⁷⁴ *Id.*

⁷⁵ See *id.*



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income-tax deduction up to \$25,000 per year on their tips.⁷⁶ The same deduction does not apply to minimum pay. So even if a worker earns more in minimum pay, she could still take home less money.

But workers won't be the only people harmed: consumers will also be harmed. Since 2012, the price of groceries in New York has risen by 65.8% percent.⁷⁷ Those increases have been particularly acute in recent years amid supply-chain disruptions and higher labor costs.⁷⁸

These burdens will be worsened by an overly rigid approach here—as shown by the Department's own data. When the Department imposed its existing standard on restaurant-delivery platform services, average consumer charges rose 36% in one year.⁷⁹ Total charges went up even faster, rising 39% in the same period.⁸⁰ A blunt approach to grocery delivery would only make things worse.⁸¹

These same harms will trickle down to local retailers. Study after study has shown that retailers benefit from grocery-delivery platform services—Instacart's services in particular.⁸² Instacart is especially helpful for small retailers, as its technology helps them

⁷⁶ See Public Law 119–21, § 70201(h), 139 Stat. 72 (July 4, 2025). See also 90 Fed. Reg. 45340, 45360 (Sept. 22, 2025) (specifying that “grocery delivery driver[s]” are eligible for the tax credit); H.R. Rep. No. 119–106, at 1502 (2025) (identifying “food delivery drivers” as among those eligible for the credit).

⁷⁷ See Comptroller Cost of Living Report, *supra* note 11, at 1.

⁷⁸ *Id.* at 2.

⁷⁹ DCWP Data Q4 2024, *supra* note 61.

⁸⁰ *Id.*

⁸¹ See Notice of Final Rule 2023, *supra* note 4, at 21 (acknowledging that standard would affect “price sensitive” customers); DCWP 2022 Study, *supra* note 2, at 34 (projecting a dollar-for-dollar increase in prices to consumers resulting from pass-throughs on higher labor costs equaling 15.6%).

⁸² See, e.g., Robert Kulick, Instacart Economic Impacts on the U.S. Grocery Industry (July 2025), <https://www.nera.com/experience/2021/nera-study-finds-direct-causal-relationship-between-instacart-ad.html?lang=en> (reporting that “Instacart has significantly increased grocery employment and output in each U.S. state, creating significant economic benefits for local economies”); Robert Kulick, The Economic Impact of Instacart on the U.S. Retail Grocery Industry Before and During the COVID-19 Pandemic (Sept. 2021),

https://www.youraccountonline.com/content/dam/nera/publications/2021/NERA_Instacart_White_Paper_Fi



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bring their businesses online and reach new customers.⁸³ Since its founding, it has helped small retailers generate \$7 billion in new revenue and create more than 68,000 new jobs.⁸⁴

Those benefits, however, will be blunted by the proposed rule. The proposed rule would carry over a standard that, in the restaurant industry, caused retailer fees to spike 11% in one year.⁸⁵ The same standard also caused order growth to fall from 17% per year on average to only 2%.⁸⁶ Higher fees and fewer orders will cost retailers real dollars. And in an industry like grocery, where margins are already thin,⁸⁷ those losses could have real consequences for average New Yorkers.

Of course, the exact effects are still unknown, as the Department has not studied the grocery-delivery industry. But that information gap is no excuse for an unguided approach. To the contrary, it is a reason to proceed cautiously. The Department should take its time, study the industry, and write a standard that takes the industry's unique features into account.

Create a compliance runway. Besides adjusting the standard itself, the Department should implement the standard gradually. It should establish an initial grace period, delay any utilization requirement, and phase in the minimum-pay rate. The Department took the same steps when it adopted the restaurant-delivery standard, largely to mitigate harms to

[nal_September_2021.pdf](#) (“The statistical analysis presents strong evidence of a direct causal relationship between Instacart adoption and economic growth in the U.S. grocery industry.”)

⁸³ See Instacart Economic Impact Report, *supra* note 10, at 7.

⁸⁴ *Id.* See also Kulick, Economic Impact of Instacart, *supra* note 82, at 1 (observing that Instacart has “disproportionately impacted” small- and medium-sized businesses).

⁸⁵ See DCWP Data Q4 2024, *supra* note 61.

⁸⁶ Compare DCWP Data Q4 2024, *supra* note 61 (reporting only 2% growth), with DCWP 2022 Study, *supra* note 2, at (estimating a 17% annualized growth rate of 17% in 2022, before standard went into effect). See also June 2021 Council Report, *supra* note 51, at 7 (estimating 23% annual order growth from 2013 to 2017).

⁸⁷ See Food Industry Association: The Food Retailing Industry Speaks (2024) (reporting that grocery margins in 2023 fell to 1.6%, the lowest since 2019, when they were 1%). See also Catherine Douglas Moran, *Grocery Industry Profit Margins Fall to Pre-Pandemic Levels: FMI*, Grocery Dive (July 3, 2024), <https://www.grocerydive.com/news/grocery-industry-profit-margins-fall-to-pre-pandemic-levels-fmi/720517/> (reporting on Food Retailing Industry data).



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workers, restaurants, consumers, and platforms. There is no reason to offer any less protection to the communities in the grocery delivery platform industry.

Again, when the Department finalized the existing standard in 2023, it delayed the effects in three ways. First, it did not enforce the standard at all for six months.⁸⁸ Second, it delayed the standard’s “utilization” requirements for about ten months.⁸⁹ And third, it phased in the minimum-pay rate. It first set the rate at \$17.96 per hour. In April 2024, it raised the rate to \$19.55. And in April 2025, it finalized the rate at \$21.44.⁹⁰

The Department took these steps to protect consumers. It understood that the standard would raise labor costs, and these costs were likely to be passed on to the consumers of restaurant food.⁹¹ It also understood that the standard was new, complicated, and unusual. Delivery platform companies would need time to adjust.⁹² It therefore delayed enforcement to give services time to build out compliant systems and improve their efficiencies.⁹³ With better efficiencies, they would be less likely to need to pass on higher costs to consumers.⁹⁴

The Department should follow the same approach here. Like delivery platforms in the restaurant industry, grocery-delivery platforms will need at least as much time to implement the new requirements. In fact, they will need more. Unlike restaurant-delivery platforms, grocery-delivery platforms are implementing a standard designed without their participation or input. The standard does not reflect their industry, economics, or business

⁸⁸ See DCWP FAQ, *supra* note 3 (noting that enforcement began in December 2023).

⁸⁹ See 6 RCNY § 7-810(c)(1).

⁹⁰ See *id.* § 810(g) – (h) (building in stepped increases). See also *Minimum Pay Rate for App-Based Restaurant Delivery Workers*, N.Y. City Dep’t of Consumer & Worker Protection, <https://www.nyc.gov/site/dca/workers/Delivery-Worker-Public-Hearing-Minimum-Pay-Rate.page> (describing rate adjustments, including adjustments for inflation).

⁹¹ See DCWP 2022 Study, *supra* note 2, at 35 (predicting a dollar-for-dollar passthrough of costs to consumers).

⁹² See *id.* at 32–33 (providing a two-year phase-in period to allow delivery services to make “operational adjustments”).

⁹³ See *id.*

⁹⁴ See *id.* at 35 (predicting that delivery services would make “large” increases in productivity, which would mitigate labor costs and mute price increases for consumers).



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models. It is therefore more likely to cause unexpected disruptions, including supply bottlenecks, implementation barriers, and price increases. To avoid those harms, grocery-delivery platforms will need at least as much time to comply—if not more.

The Department should therefore build in three ramp-up periods. First, it should delay the pay standard's effective date for six months. Second, it should delay any utilization requirement for at least ten months. And third, it should build in a two-year stepped increase to arrive at the full pay rate. These steps should match the stepped increases for restaurant delivery, adjusted for inflation:

Baseline Restaurant Minimum Rate ⁹⁵	Adjusted Grocery Minimum Rate ⁹⁶
2023: \$17.96	2026: \$19.23 ⁹⁷
2024: \$18.96	2027: \$20.29 ⁹⁸
2025: \$19.96	2028: \$21.35 ⁹⁹

Streamline recordkeeping. Finally, the Department should streamline the recordkeeping rules. While the Department can specify recordkeeping requirements under Local Law 123, the requirements must be “necessary and appropriate.”¹⁰⁰ That is, they must serve some reasonable relationship with a purpose authorized by law.¹⁰¹ But many of the proposed rules

⁹⁵ See 6 RCNY § 7-810(b)(2)(i)–(iii) (setting baseline rates before adjustment for inflation).

⁹⁶ Amounts to be adjusted according to future rates of inflation as of the effective date.

⁹⁷ Representing the 2023 restaurant rate adjusted for inflation using the Consumer Price Index for All Urban Consumers. See *CPI Inflation Calculator*, U.S. Bureau of Labor Statistics, https://www.bls.gov/data/inflation_calculator.htm (last visited Nov. 21, 2025).

⁹⁸ Representing the same quantum increase (1.055) over adjusted 2026 grocery rate as the 2024 baseline restaurant rate (\$18.96) was over the 2023 baseline restaurant rate (\$17.96).

⁹⁹ Representing the same quantum increase (1.052) over adjusted 2027 grocery rate as the 2025 baseline restaurant rate (\$19.96) was over the 2023 baseline restaurant rate (\$18.96).

¹⁰⁰ See N.Y. Admin. Code § 20-1506(c).

¹⁰¹ See *Greater N.Y. Taxi Ass'n v. N.Y.C. Taxi & Limousine Comm'n*, 36 N.E.3d 632, 637 (N.Y. 2015) (explaining that an agency may “fill in the details” of legislation, but may not adopt rules “that go beyond



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would serve no such purpose. Many are unreasonable because they create administrative and operational burdens out of proportion to any potential value. Others would require records that serve no purpose at all. And still others would do both:

- **Proposed section 7-805(c)(4)(i):** This section would require a delivery service to keep a copy of each offer or assignment in the same form “communicated” to a worker. That requirement would be unnecessarily burdensome. On many digital platforms, including Instacart’s, opportunities are shown to a worker through an interactive visual display. The display is dynamic and augmented by graphics, navigational bars, and other visual elements. A strict interpretation could find that the only way to store it in its original form is to capture a screenshot. So read literally, the proposed rule could require a screenshot every time a worker views a trip opportunity—a technically arduous task that would require significant time and expense, and could result in workers themselves being required to take such screenshots and share them with the companies.

Instead, the rule should simply require a delivery service to capture the data points disclosed to the worker. And those data points should be limited to the disclosures required by Local Law 123.¹⁰² Nothing more is necessary to serve the law’s purpose.

- **Proposed section 7-805(c)(4)(iii) and 7-805(c)(4)(iv):** These provisions would require delivery services that are not third-party food delivery services to generate and retain (1) a routed path for each offered trip and (2) a direct, straight-line distance between the first pickup and last dropoff. Neither requirement is authorized by Local Law 124. The statute requires only disclosure of an estimated time and distance sufficient to help a worker decide whether to accept a trip. It does not require creation, storage, or long-term retention of routing data—or the calculation of straight-line distances, which have no practical value to workers assessing a trip.

the text” of the legislation or that are “inconsistent with the statutory language or its underlying purposes” (quoting Gen. Elec. Cap. Corp. v. N.Y. State Div. of Tax Appeals, 810 N.E.2d 864 (N.Y. 2004))).

¹⁰² See N.Y. Admin. Code § 20-1521(d).



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The routing obligations also conflict with the operational realities of open-market grocery platforms. Instacart does not itself generate routes for shoppers; it relies on a third-party routing provider. Under existing contracts, Instacart is required to delete those routes after a short period. Imposing a three-year retention requirement would force Instacart to violate its contractual obligations, overhaul established technical systems, and renegotiate complex commercial agreements—all without any statutory justification. Local Law 124 does not permit the Department to mandate the creation or long-term retention of routing data for its own sake.

The “direct distance” requirement would serve no purpose. A “direct distance” is a straight line between two points.¹⁰³ Such a line says very little about the length of any given trip. Few trips run in straight lines; almost every one requires turns, backtracking, and other irregular movements. To make the point starkly, imagine a trip running a hundred miles in a perfect circle. While the actual travel would be one hundred miles, the “direct distance” would be zero. Neither the Department nor a worker could gain any useful information from that record. Instead, the record would only create an additional compliance burden. This requirement should be eliminated.

If the Department declines to remove these requirements, it should at minimum delay their effective date for a substantial period. This would allow newly regulated grocery-delivery platforms sufficient time to renegotiate vendor contracts, redesign their systems, and implement any required changes in a safe and orderly manner—rather than forcing abrupt operational disruptions that would harm workers, retailers, and consumers.

- **Proposed section 7-805(c)(4)(v):** This section would require a delivery service to store a copy of the route used to provide a trip’s estimated delivery distance. This requirement is both burdensome and unnecessary. As written, it would require the delivery service to create numerous and unnecessary records. Because the requirement would apply to each trip estimate, it would require a new record every time the delivery service presents a trip to a different worker. The trip estimate must

¹⁰³ See Proposed Rule at 6 (proposing new 6 RCNY § 7-801(2)).



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include the worker’s travel to the first pickup point,¹⁰⁴ and workers may view the trip offer from different places. So the estimate for each worker will be different. And because the estimate for each worker will be different, the delivery service must create and store a unique estimate record each time.

That is already a massive recordkeeping obligation. It requires at least one record for every offer to every worker in the city. And this rule would instantly double the burden. The rule would require not only a record of the estimate itself, but also of the underlying route—which the worker may not even follow. Nothing in the local law requires such redundancy, nor does common sense. This requirement should be eliminated.

- **Proposed section 7-805(c)(4)(vii):** This section would require a delivery service to create and store pickup and delivery locations specified by longitude and latitude, accurate to the third decimal place. That requirement is unjustified and unnecessary.

To start, the requirement is not authorized by Local Law 123. The law requires a delivery service to inform a worker about each pickup and delivery “address” in a trip.¹⁰⁵ In normal parlance, address means street address.¹⁰⁶ Laws must be read according to their ordinary meaning,¹⁰⁷ and few people would understand “address” to mean longitude and latitude. It is therefore unreasonable to stretch Local Law 123 to include longitude and latitude points at all, much less require measurements accurate to the third decimal place.

More to the point, longitude and latitude points would offer no useful information. Street addresses can be located just as easily—often more so—using a common

¹⁰⁴ See N.Y. Admin. Code § 20-1501 (defining “trip”).

¹⁰⁵ See N.Y. Admin. Code § 20-1521(d)(1).

¹⁰⁶ See *Address*, Dictionary.com, <https://www.merriam-webster.com/dictionary/address> (providing examples: “asked for her name, home address, and phone number” and “an envelope with an illegible address”).

¹⁰⁷ Majewski v. Broadalbin-Perth Cent. Sch. Dist., 696 N.E.2d 978, 980 (N.Y. 1998).



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navigation tool, like Google Maps. Longitude and latitude points are simply surplus detail and an additional compliance burden. This section should be removed.

- **Proposed section 7-805(c)(12):** This section would require a company to keep all “policies and practices” related to compliance with the local laws, including documents like manuals, training, memos, and “instructions.” The field of covered records could be potentially vast. It could include not only official company policies, but also routine internal documents like digital messages and emails. Merely identifying these documents will be a costly administrative endeavor—to say nothing of maintaining them. And the resources invested would produce no obvious benefit. Nothing in Local Law 123 requires a delivery platform to create these documents. Nor does it require a delivery platform to preserve them. No purpose identified by the law justifies the requirement. In fact, the only apparent purpose seems to be enabling fishing expeditions. While we do not believe that this is the intent behind the language, as currently written this section is overbroad, could lead to litigation, and should be eliminated.

Eliminating or streamlining these sections will mitigate the compliance burden on newly covered delivery services. That burden is already substantial. Its costs will already be felt by the New Yorkers who rely on these services to get the food they need. We trust that you take these burdens seriously and will continue to work to eliminate unnecessary ones.

Thomas McNeil
Public Policy Manager, Northeast Region, Instacart

December 8, 2025



New York City Department of Consumer and Worker Protection (DCWP)
42 Broadway
New York, NY 10004

RE: Comments on Proposed Rules to implement Local Laws 95, 107, 108, 113, 123, and 124 of 2025.

Dear Commissioner Mayuga:

On behalf of Shipt, Inc. (hereinafter, 'Shipt'), I am writing to provide comments on the above listed rules, which expand the applicability of minimum pay requirements to grocery delivery workers and clarify additional requirements for third-party grocery delivery services.

Shipt is a retail technology company that connects people to reliable, high-quality delivery. In New York City, we offer flexible work opportunities to more than 3,000 shoppers and connect more than three million households to a dozen trusted retailers, including Target, Food Bazaar, and Fairway Markets—ensuring customers in all five boroughs can access groceries and essential items. The goal of our comments is to provide the DCWP with information needed to refine the law in a way that preserves fair pay and flexible opportunities for workers while keeping grocery delivery affordable for customers. Without a balanced approach, those very outcomes—fair pay, flexibility, and affordability—could be jeopardized. In order to preserve our model (Appendix A: *Overview of the Shipt Model*), we propose that DCWP implement the following changes:

- **Delay the implementation deadline from January 26, 2026, to January 1, 2027, to ensure DCWP collects input from grocery delivery workers the way DCWP did in 2022 for food delivery workers, and provide companies reasonable time to make any needed significant technological changes.**
 - When developing the legislation and rules related to food (restaurant) delivery, the Council and DCWP collected direct input from food delivery workers, but have failed to make the same effort here for grocery delivery workers. Even DCWP's 2022 report on food delivery workers acknowledges that the workers surveyed did not complete grocery delivery on a scale sufficient to materially impact their understanding of food delivery workers, highlighting the plausibility that a survey of grocery delivery workers would produce different findings.¹ Yet the rules as written today have not been modified to reflect this difference in experience, nor have any grocery delivery workers been surveyed.
 - Moreover, the requirements as written today require significant technological changes to maintain the reliable experience that both shoppers and customers depend on. An implementation of January 26, 2026, provides insufficient weeks to support compliance without final rules in place as of today's date.
- **Modify § 7-810 Minimum Pay to (a) exclude on-call time from the standard and alternative methods for grocery delivery platforms that operate on a flexible, no-schedule, no-penalty, or open-claim basis; and (b) start trip time at arrival at the retailer for grocery delivery platforms like Shipt that offer advanced offers with flexible start times.**
 - The proposed methodology for minimum pay was designed for the food delivery model, which is fundamentally different from Shipt's. More specifically, Shipt does not have a dispatch, on-demand, or on-call model. Instead, our model is designed to provide unparalleled flexibility, allowing shoppers to fit work in around other commitments. The data below demonstrates that Shoppers receive offers for available orders well in advance, with no requirement to be on-app, review orders, accept the offers they receive, or be in close proximity to the store. In fact, Shoppers review, receive offers, and/or claim available orders from anywhere in the city, including their home or workplace. This makes "on-call" time irrelevant to the experience of shoppers on Shipt's platform.
 - More than 80% of offers open 2-4 hours before the customer's expected delivery time, and less than 2% open less than 2 hours before the customer's expected delivery time.²

¹ New York City Department of Consumer and Worker Protection. A Minimum Pay Rate for App-Based Restaurant Delivery Workers in NYC. Nov. 2022.

² Data and methods to support the data references throughout this letter. Shipt conducted an analysis of grocery deliveries in New York City over a three-month period prior to submitting the Overview of the Shipt Model to DCWP in October 2025. The purpose of this review was to understand how shoppers interact with the platform, fulfill customer orders, and provide a data-driven picture of how Shipt's flexible model operates in practice. The analysis relied on platform-generated data reflecting real order events—such as when orders were opened and accepted by a shopper and when key actions in the fulfillment process occurred—to evaluate patterns related to shopper flexibility, experience, and customer-shopper relationships. If the Department determines that additional detail on the statistics or our analytical methods would help support our claims, we respectfully request the opportunity to provide supplemental clarification before finalizing the rulemaking.

- For the majority of orders in New York City, shoppers will accept the order but delay shopping for it for at least 30 minutes. This highlights the complete flexibility to do whatever a Shopper chooses to do between the time they accept an order, and when they begin shopping - in between, a shopper may run personal errands, finish existing work, etc., and so compensable time should not begin until they are at the store shopping.
- Orders are made available to shoppers based on the neighborhoods they choose, not on their immediate proximity to a retail location. This system allows shoppers to fulfill orders at times and locations that fit seamlessly with their other obligations.
- More than 20% of orders are picked up spontaneously, without shoppers having to pre-select their availability.
- A majority of shoppers in NYC accept and complete work for only three or fewer offers, visiting only one store location on a given day with Shipt. This highlights that shoppers are not spending a significant portion of their time waiting for or reviewing offers.
- **Modify § 7-805(g) Recordkeeping to remove the requirement to include the direct distance on the offer card for grocery delivery workers.**
 - The direct distance requirement is not applicable to the grocery delivery business and would only confuse shoppers on the Shipt platform. In particular, the direct distance provides no added value to the grocery delivery worker's decision-making, as deliveries are made in passenger vehicles and are limited to a few per route due to the perishability of groceries. Shoppers have the flexibility to choose and take any route they wish, regardless of the route Shipt suggests.
- **Modify § 7-804 Notice of Rights to remove the requirement to text shoppers a link to the notice of rights, making text as a communication method optional.**
 - The rules, as written today, require companies to send workers a text message containing a link to the notice of rights. Shipt communicates with shoppers through the application, not text message, and in-app communication is preferred by the shopper population. The requirement to add a text message not only creates a technological burden but also forces a communication and potential carrier fee for each SMS on shoppers that they may not want to receive.

Without accepting Shipt's proposals, Shipt would have to fundamentally change key components of our model, which would erode the shopper experience by limiting work availability and the flexibility shoppers want and need. If the current rules stand, the following experiences that shoppers value about performing work on the Shipt platform, instead of a food delivery platform, are likely to change fundamentally:

- Shoppers currently receive offers for available orders well in advance, with no requirement to be on-app, review orders, or accept the offers they receive.
- Real-time dispatch of offers is the exception, not the rule.
- Shoppers currently receive offers and claim available orders from anywhere in the city, including at home or at work.
- Shoppers can currently browse and claim available orders without pre-selecting preferred delivery windows or a pre-set schedule.
- Shoppers are currently prioritized to receive orders from preferred customers they've built strong relationships with, even if they aren't scheduled or near the store when a preferred customer places an order.
 - More than 300K+ preferred connections have been made between NYC shoppers and customers, and more than 25% of order bundles are delivered by a preferred shopper in NYC.

We hear from shoppers that they choose to work with Shipt because of its existing structure and its distinctions from food delivery, and therefore urge the Department to exercise its authority to establish a minimum payment calculation tailored to the working conditions of grocery delivery workers. We stand ready to provide more information to support the department in finalizing a minimum pay rule that guarantees fair earnings for grocery delivery workers on our platform *and* protects their way of working and desire for flexibility.

Sincerely,
 Matthew Spring
 Senior Manager, Government Affairs
matthew.spring@shipt.com

Shipt™ Overview of the Shipt Model

Created for NYC Dept of Consumer and Worker Protection - October 2025

Shipt is a retail technology company that connects people to reliable, high-quality delivery. In New York City, we offer flexible delivery work opportunities to more than **3,000 shoppers**** and connect more than **three million households to a dozen trusted retailers**, including Target, Food Bazaar, and Fairway Markets—ensuring customers in all five boroughs can access groceries and essential items.

Shipt's Proposal for Grocery Delivery Minimum Pay

Our goal in this rulemaking is to be a constructive and collaborative partner to DCWP, providing the information needed to refine the minimum pay rate methodology in a way that preserves fair pay and flexible opportunities for workers while keeping grocery delivery affordable for customers. Without a balanced approach, those very outcomes — fair pay, flexibility, and affordability — could be jeopardized.

“Having flexible work is essential; it’s the reason I pursued this job. If new scheduling requirements compromised my ability to choose when and how I work, it would significantly impact my livelihood and the way I manage my daily responsibilities distinctively. In my metro area, I appreciate the capability to manage my schedule according to personal commitments, whether it’s caring for others or fulfilling obligations after another job.”

- CARLOS R., NYC shopper

The current methodology for minimum pay was designed to apply to the restaurant delivery model, which is fundamentally different from the model upon which Shipt’s business was built. Customers’ expectations when ordering groceries for the week are widely different from those of someone ordering a prepared meal right now and the way in which workers earn on our platform work is very different. **Shipt doesn’t have a dispatch, on-demand, or on-call model.** Instead, our model is designed to provide unparalleled flexibility, allowing shoppers to fit work in around other commitments. Given this, we propose that DCWP implement the following changes:

- **Exclude on-call time from the minimum pay methodology** for grocery delivery platforms that operate on a flexible, no-schedule, no-penalty, or open-claim basis.
- **Start trip time at arrival at the retailer** for grocery delivery platforms that offer advanced offers with flexible start times.

Shipt's Model

A key reason shoppers choose Shipt is the flexibility they have to engage with our platform on their own terms. Through the Shopper app, they can incorporate this work into their other obligations—whether it is while their kids are in school or after they finish up at full-time employment.

More than
85% of shoppers choose to work less than 10 hours a week with Shipt.

Nearly
40% Say doing good and serving their community are why they choose work with Shipt over other platforms.

90% prefer setting their own hours as an independent contractors over standard shifts with set income and traditional benefits.

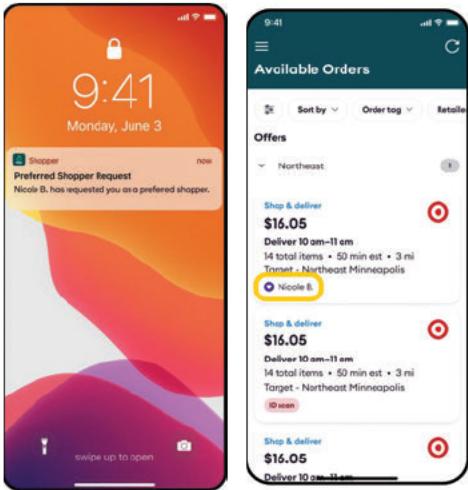
*Based on a nationwide survey of shoppers in 2024.

**Includes shoppers that completed at least one order in 2024.

Note: All deliveries with Shipt are made via passenger vehicles.



Shipt's Preferred Shopper Program



Customers can "favorite" a shopper after giving them a 5-star rating. If the shopper accepts this request from the customer, they will be prioritized to receive offers to shop the customer's future orders, even when they're not scheduled to work. This increased likelihood of receiving offers from familiar customers helps shoppers build rapport and efficiently deliver everything the customers need, ultimately enhancing their chances of receiving higher ratings and tips.

To maintain affordability for customers, the restaurant minimum pay methodology would require Shipt to significantly limit preferred offers, as shoppers are often not scheduled or near the store when a preferred customer places an order.

300K+

Preferred connections between New Yorkers

More than

25%

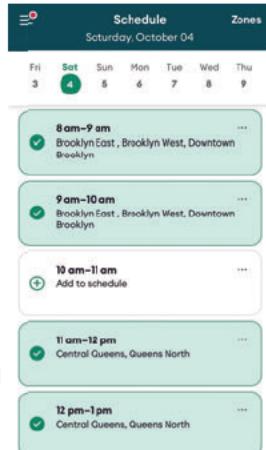
Order bundles delivered by a
preferred shopper in NYC

“As a preferred shopper, I have formed strong relationships with customers, building trust and understanding of their needs. This connection makes both service and convenience priorities for us. The Shipt platform fits my unique needs superbly. Unlike other platforms, it provides me the opportunity to accommodate my lifestyle and maintain a work-life balance.” - ZHENHONG W., NYC shopper

Flexibility: Setting delivery windows and zones

Shoppers are neither “on-call” nor “on-app.” Instead, they inform Shipt of their availability by choosing delivery windows – a specific block of time a shopper selects to indicate when they’re available to shop and deliver orders. They can create their own schedule and select the zones (neighborhoods), days, and times they want to receive order offers. Given the ability to indicate their time preferences, they can receive offers for available orders well in advance. Shipt pushes the flexibility even further - with Shipt, shoppers have **no requirement to be on-app, review orders, or accept the offers they receive**, even if they provide delivery windows!

Shoppers can also update their zones for specific delivery windows without impacting their default zones. This feature is beneficial if they know they'll be near another zone on a certain day (i.e., on the way home from an appointment), but don't want to schedule themselves there for all available windows.



"In choosing how I work, I mainly rely on the flexibility to claim Open Metro orders to fit my ever-changing schedule. At times, I schedule delivery windows in advance to organize my week. This combination empowers me to align work with personal commitments such as school, family, or another job...Having worked with both restaurant and grocery delivery platforms, I find that restaurant deliveries demand immediate availability, as they focus on quick, timely service without the flexibility of advance scheduling. This contrasts with grocery delivery, where I can plan routes and manage my time more effectively, aligning work with my daily schedule. This adaptability in grocery delivery significantly outweighs the constraints I experience with restaurant orders."

Two ways to claim work

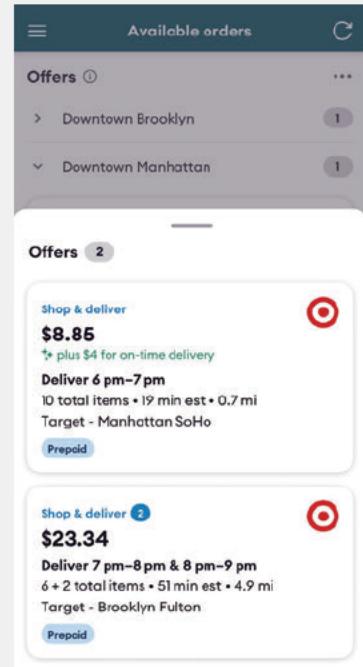
1

Advanced Offering: Claiming an order based on the shopper's chosen delivery windows and zones

The **Available orders screen** is where shoppers can review orders that are currently available to claim. By default, all available orders are displayed and sorted by their zone, but can also be sorted by delivery window to help a shopper plan or map out their day.

The **Offers section** in the Available orders screen displays orders that have been offered to the shopper and are available to claim.

Shipt does not restrict offers based on a shopper's location, so they do not need to wait near a store to receive the best offers. Shoppers can review offers from anywhere in the city, including their home or workplace, and while attending to other work or personal obligations. **This is a key reason why on-call time is inapplicable to Shipt and should be removed from the minimum pay methodology.**



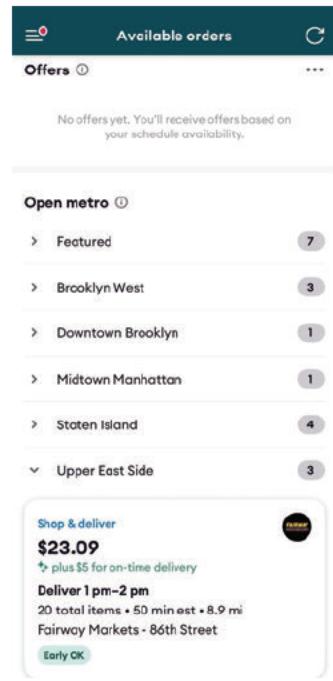
2

Open Metro: Always open orders available to all across the city

Shoppers can also review and claim orders without pre-selecting preferred delivery windows via Shipt's "Open Metro" feature.

Open Metro allows shoppers to browse and claim available orders across an entire metro area in real time, giving them the flexibility to pick up work spontaneously. The Open metro orders section in the Available orders screen displays orders that are available to shoppers in a metro, regardless of their default zones or location.

More than 20% of NYC order claims are from Open Metro. Shoppers often use Open Metro when they do not have an order claimed and are available to shop, are already planning to run an errand, or have a free hour at the last minute and want to browse to see if there is a compelling order available that fits their schedule or plans.



“I prefer to claim orders in Open Metro because it grants me the ability to manage my schedule without being bound to fixed delivery windows. This method permits me to accommodate other responsibilities, such as caregiving or managing a full-time job, without the pressure of adhering to a rigid timetable.”

-AHMED C, NYC Shopper

The flexibility of Shipt's model in NYC

Shipt's offering allows shoppers to plan their work in advance.

“

“I value receiving offers in advance and the freedom to accept or reject them anytime, managing both time and earnings efficiently. Being able to do this from any location underscores the adaptability I rely on. Having worked in both grocery and restaurant delivery, I've seen clear differences. Grocery delivery offers more flexibility, with options to claim open orders and self-bundle tasks, allowing better schedule management. Restaurant delivery, however, is more rigid and proximity-based, with challenges in planning ahead due to time-sensitive orders.” -KAMAU J., NYC shopper



“

“As a single mom, this flexibility is crucial for me...I prefer receiving orders in advance, as it helps me organize my day around my commitments. This setup allows me to adjust my schedule without penalties, offering the freedom to balance various aspects of my life without being tied down to a fixed routine.” -ERICKA M., NYC shopper

Real-time dispatch is the exception, not the rule.

Shoppers don't start heading to the store for **at least 30 minutes** on

40% of orders claimed

Shoppers don't begin shopping for **at least 30 minutes** on

50% of orders claimed

Shoppers often claim orders while in other NYC neighborhoods.

**More than
40%** orders are claimed by shoppers **more than 1 mile** from the store

**More than
20%** orders are claimed by shoppers **more than 3 miles** from the store

No penalties: Shoppers are free to review, claim and drop orders

Shoppers retain full control over their schedules. There is no expectation to review, respond to, or accept offers during their chosen windows. Shipt does not factor a shopper's acceptance rate into future offers or pay.

We also recognize that unexpected obligations arise and plans can change quickly. Shoppers can drop an order they have already claimed without penalty up to an hour before the delivery window, which is why Shipt is proposing to start trip time once the Shopper is at the store.

“

“Flexibility is crucial for me. It's the cornerstone of my long-term engagement with Shipt, enabling me to support my family without the constraints of a set schedule that might require cancellation. Being able to work on my terms allows me to earn a living worry-free.

As a single mother raising an autistic child, the flexibility to choose between open Metro orders and scheduled delivery windows is invaluable. Shipt's system allows me to accept or decline offers without pressure, ensuring I only commit to what I am comfortable with.”

- DANYETTA B., NYC Shopper

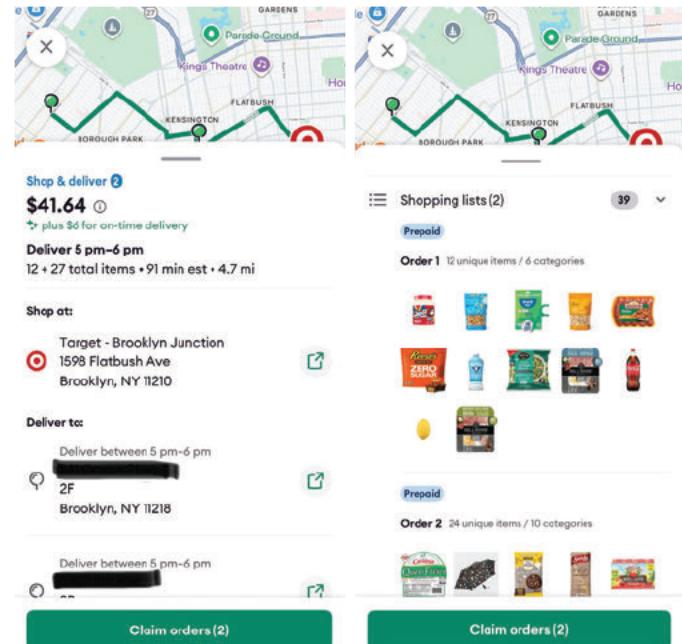
Bundles and Manual Pairing Orders: Maximize earnings and time from one store

Manually Pairing Orders

Shoppers may receive offers that have the same delivery window as another order they have already claimed. If the newly offered order pairs well with the claimed order, a shopper may decide to manually pair and complete the orders together. By shopping multiple orders simultaneously and delivering them to members in close proximity, shoppers maximize their efficiency and earning potential.

Order Bundles

Bundles are orders paired together by Shipt based on various factors, including store location, order size, and delivery locations. Shoppers have the option to claim a bundle of multiple orders shopped simultaneously at the same store and delivered in one trip, allowing shoppers to maximize their efficiency and earning potential.



“

“Having experienced both restaurant and grocery delivery, I find grocery platforms offer more control over my schedule. They allow me to bundle orders and plan more strategically, unlike the unpredictability of restaurant deliveries, making it easier to maximize my efficiency and income.” - DESONTIA R., NYC Shopper

A day in the life of a shopper with Shipt in NYC

How a shopper with Shipt spends their time working does not match that of a food delivery worker, which further makes the on-call time calculation incompatible.

The in-store shopping experience, particularly when efficiently bundling or manually pairing orders at the same store location, takes up a much larger share of their work time. This results in fewer trips, less driving between store locations, and less focus on reviewing and accepting offers to fit this work around their other commitments.



On a day when they shop with Shipt, a majority of shoppers in NYC:

complete and visit

3 **1**

or less order store
bundles location

Expanding access to fresh and affordable food

Powering deliveries to more than three million households across all five boroughs, Shipt plays a vital role in providing fresh, nutritious groceries at affordable prices. **We believe fresh food should be accessible to everyone, regardless of zip code**—and we're uniquely positioned to help reduce barriers to food access.

For the vast majority of our deliveries in New York City, product prices on Shipt's platform are generally the same as those available directly from the retailer.

And by accepting SNAP benefits and offering a discounted membership to SNAP recipients, we provide essential access to groceries and other necessities to communities regardless of income, transportation resources, or where they live.

A strong supporter of community-led initiatives to strengthen food access in New York City, Shipt also supports organizations such as Teens for Food Justice, Equity Advocates, Lemontree, Greene Hill Food Coop, Rethink Food, and Food Recovery Network.



“One key aspect that drives my commitment to Shipt is the ability to support those who lack the means to procure essential groceries and necessities on their own, like families with small children or elderly residents. Providing such assistance is deeply fulfilling and essential, allowing me to make a significant difference in people’s lives.”

- OMAYRA E., NYC Shopper



December 8, 2025

Department of Consumer and Worker Protection
City of New York
42 Broadway
New York, NY 10004

RE: Comments on Proposed Rules Relating to Contracted Delivery Workers

Dear Commissioner Mayuga:

On behalf of DoorDash, I am writing to provide comments on the proposed rules issued by the NYC Department of Consumer and Worker Protection (“DCWP” or “the Agency”) to implement numerous local laws related to contracted delivery worker protections.

DoorDash is a technology company whose mission is to grow and empower local economies, including in New York City. We do that by partnering with thousands of local merchants throughout the City and connecting New Yorkers with their favorite local businesses for online ordering, takeout, delivery, and marketing services. We also empower New Yorkers from all walks of life to earn money when, where, and how they choose by delivering meals and other essentials to their communities.

We appreciate the Agency’s attention to these important issues and are thankful for this opportunity to provide feedback on the proposed rules in order to ensure that any final regulations can be reasonably implemented and do not result in adverse impacts on delivery workers, local merchants, or consumer access to essential services. Please find our comments below.

DCWP Should Permit Alternative Options for Delivery Services to Convey Direct Distance

Concern: DCWP’s proposed rules would revise Section 7-806 to require that the distance disclosure for any trip offered to a contract delivery worker include both an (1) estimated direct distance (estimated “as-the-crow-flies” distance between first pickup and last dropoff location) and (2) estimated routed distance (distance traveled on public right of ways on full route from first pickup location to last dropoff location).

While we understand that details regarding the general proximity of the first pickup and final dropoff locations may be informative to some delivery workers, we do not think this information is as valuable as the estimated routed distance, which third-party food delivery services and third-party courier services are required to provide under existing regulations and have done so for years. **Showing two separate distance disclosures is likely to be confusing to Dashers given how only routed distances have been historically provided in NYC.**

Showing both disclosures as part of each trip offer is also likely to be challenging. First, significant engineering resources will be necessary to build a new feature for the Dasher app applicable only to NYC and inconsistent with the technical architecture used across all other jurisdictions. Second, NYC regulations already require significant disclosures as part of each trip offer. Adding a new disclosure to each trip offer – along with any necessary context to prevent Dasher confusion about the difference in the disclosures – will significantly crowd the offer screen and make it less likely that Dashers are differentiating critical information as part of the offer.

Recommendation: We recommend that DCWP eliminate the requirement to disclose the estimated direct distance as part of any final rule. However, if DCWP maintains that this disclosure is critical as part of each offer, we urge the Agency to provide third-party food delivery services with alternative options for conveying the information in order to prevent worker confusion, mitigate risk of overcrowding in the app, and minimize engineering and operational burdens for third-party food delivery services.

For example, we **recommend that the final rule permit displaying a map that shows the first pickup and final dropoff location as an acceptable alternative to displaying an estimated direct distance.** This would allow a delivery worker to visually see the proximity of these two locations in a format that is intuitive and clearly informs a delivery worker on whether, for example, a route will end in an entirely different neighborhood than where the first pickup occurred.

We propose the following changes to proposed Section 7-806(g):

(g)(1) When disclosing the estimated distance from the first pick-up location of the trip to the final drop-off location of such trip to a contracted delivery worker pursuant to § 20-1521(d)(2) of the Administrative Code, a delivery service must separately disclose both (a) the direct distance between the first pick-up location of the trip and the final drop-off location of such trip and (b) the routed distance between the first pick-up location of the trip and the final drop-off location of such trip.

(2) In lieu of disclosing the direct distance for a trip pursuant to paragraph (1) of this subdivision, a delivery service may instead display a map that shows the first pickup location of the trip and the final drop-off location of such trip.

DCWP Should Maintain Distance Preference Alignment With a Trip's Routed Distance

Concern: DCWP's proposed rules would revise Section 7-806 to require that a food delivery worker's established distance preferences be associated with the newly-defined direct distance of trip. Third-party food delivery services are required under existing NYC regulations to provide food delivery workers with the option to set the maximum distance they are willing to travel on a trip and delivery services are prevented from offering trips in violation of this preference. For years, these preferences have been tied to the routed distance of the trip from the first pickup location to the last dropoff location.

We believe this change is unwarranted and likely to cause delivery worker confusion. First, we believe most Dashers naturally associate the distance of a trip with the full routed distance from

first pickup to final dropoff – not the as-the-crow-flies distance between the first pickup and final dropoff points. This is also the distance that they are most likely to see a benefit in establishing a maximum preference for traveling. Second, as noted above, third-party food delivery services have been required to provide workers with the option to set a maximum distance preference for almost four years. During this time, distance preferences have been exclusively associated with routed distance. Changing the type of distance that is associated with distance preferences now is likely to leave delivery workers with a tool that's less protective, less intuitive, and inconsistent with years of practical use.

This proposed change would also scrap significant engineering efforts and investments by DoorDash and other third-party food delivery services to build the existing preference functionality. **Associating distance preferences with an entirely new type of distance measurement would require third-party food delivery services to duplicate these efforts without demonstrable benefits to workers and with the real risk of degrading the usability of the preference tool.** This is particularly harmful since only third-party food delivery services — and no other regulated delivery service — are subject to preference requirements at all.

Recommendation: We urge DCWP to **maintain the existing framework where a food delivery worker's distance preference is associated with the routed distance of a trip.** We propose the following changes to proposed Section 7-806(a)(2):

2. Pursuant to § 20-1521(a)(1) of the Administrative Code and this section, a third-party food delivery service or third-party courier service may not offer or assign a trip to a food delivery worker if the routed ~~direct~~ distance between the first pickup location of such trip and the final drop-off location of such trip exceeds the maximum distance parameter selected by such food delivery worker. ~~The routed distance is often longer than the direct distance, and the food delivery worker may travel significantly longer on the routed distance and may make multiple stops along the routed distance. By setting a maximum distance parameter, a food delivery worker is not limiting the routed distance. Rather, a food delivery worker is choosing to be nearer to the first pick up location at the end of the trip.~~

DCWP Should Ensure that Delivery Services Have Sufficient Implementation Time

Concern: As noted above, DCWP's proposed changes to the distance disclosure and distance preferences for food delivery workers would necessitate significant design and engineering changes to the worker platform and other operational burdens. If these requirements are retained without implementing the recommendations above, it is critical that the Agency provides delivery services with adequate time to design and build new direct distance disclosures in the app and entirely reconstruct the existing distance preference system after the final rules are issued. **The minimum required notice of 30 days under NYC's City Administrative Procedures Act will not be a sufficient implementation period given the scale and complexity of these proposed changes.**

Delivery services cannot start to implement these requirements today based on the draft rules alone. First, we hope the Agency will be responsive to our feedback outlined above. Second, even small changes regarding the requirements related to disclosures or preferences that are

included in the final rules could render any planning and implementation moot, necessitating that delivery services scrap plans and then dedicate an equal amount of resources to implement something different. As a result, delivery services cannot begin implementation of many of these requirements – especially those that necessitate changes to the platform or engineering resources – until the final rules are released.

Adequate implementation time is critically important given the significant size of the fines and penalties that delivery services could face for each instance of non-compliance, even if delivery services are working in good faith to implement new requirements. This includes the potential risk that a delivery service's license to operate could be revoked or not renewed for compliance lapses – an extreme outcome that could have devastating impacts on local businesses who rely on delivery services to reach their customers and delivery workers who rely on delivery services for earnings opportunities.

Recommendation: We urge DCWP to provide delivery services with **no fewer than 120 days** to implement any proposed changes after the final rules are released. This will ensure that relevant teams have adequate time to design, build, and test any new disclosure or functionality and mitigate risk of unintended compliance gaps.

* * *

Thank you for the opportunity to provide comments as DCWP undertakes this rulemaking and for your consideration of these requests.

Sincerely,

Ivan Garcia
Senior Manager, NYC Public Policy



Grubhub Holdings Inc.
222 W Merchandise Mart Plaza, Suite 800
Chicago, IL 60654

December 8, 2025

New York City Department of Consumer and Worker Protection
42 Broadway #5
New York, NY 10004

On behalf of Grubhub Holdings Inc. (“Grubhub”), we are writing to provide comments on the New York City Department of Consumer and Worker Protection (“DCWP”) proposed amendment to Subchapter H of Chapter 7 of Title 6 of the Rules of the City of New York to implement Local Laws 95, 107, 108, 113, 123, and 124 of 2025. Grubhub is grateful for the opportunity to provide feedback on the proposed rules. Please find the comments below.

Concern: Maintaining actual copies of offers is administratively infeasible. The proposed amendment should not require companies to maintain copies of offers sent to delivery workers. Section 7-805(c)(4)(i) requires delivery services to maintain “[a] copy of the offer or assignment that was communicated to such contracted delivery worker . . . Such copy must record the offer, assignment, or disclosure in the form in which it was communicated to such contracted delivery worker[.]”

From an administrative standpoint, there is no feasible mechanism to make and store copies of every offer sent to delivery workers. Instead, companies should be required to maintain the information regarding each offer sent to a delivery worker. This would serve the dual purposes of not creating impossible administrative tasks while also requiring platforms to preserve essential information presented to couriers.

Recommendation: Grubhub recommends that DCWP revise the proposed amendment to allow for the retention of data related to each delivery offer.

Concern: The changes to estimated distance will result in less transparency to delivery workers. Section 7-806(g) of the proposed amendment states that “[w]hen disclosing the estimated distance from the first pick-up location of the trip to the final drop-off location of such trip to a contracted delivery worker pursuant to § 20-1521(d)(2) of the Administrative Code, a delivery service must separately disclose both (a) the direct distance between the first pick-up location of the trip and the final drop-off location of such trip and (b) the routed distance between the first pick-up location of the trip and the final drop-off location of such trip.”

Grubhub currently discloses to drivers the estimated distance of the delivery from the driver’s location at the time of acceptance to final dropoff based on the routed distance. Requiring

Grubhub to instead disclose the estimated direct and routed distances from the first pick-up location of the trip to the final drop-off location of the trip will not accurately reflect the total distance a driver will need to travel to complete a delivery. This would be a less transparent and potentially misleading experience for drivers, causing confusion and aggravation.

Recommendation: Grubhub recommends that DCWP allow delivery services to alternatively disclose the estimated routed distance of the entire trip, similar to the alternative option with regards to estimated time.

Concern: **The proposed amendment allows too little time to implement new, complex requirements.** DCWP's proposed amendment purports to implement laws that take effect on January 26, 2026. However, the proposed amendment contains numerous requirements that are unreasonably difficult for delivery services to implement over a couple of months. The proposed amendment also imposes new substantive requirements that could not reasonably have been expected from the laws themselves.

Grubhub builds technology at a national level for our customers across multiple devices; a change to one part of the app experience is never made in a vacuum. Several of the requirements within the proposed amendment dictate redesigns of features and systems within the Grubhub for Drivers app. After design is complete and the user experience is confirmed, the changes must then be built and undergo rigorous testing. Although new requirements may appear simple, they can take months of work across multiple teams. Overly prescriptive regulations as to the method and format in which delivery services provide information required by a law can be excessively burdensome and necessitate delays in implementation.

Recommendation: Grubhub recommends that DCWP extend the effective date of the proposed amendment until August 1, 2026, or six months after the proposed amendment is finalized, whichever is later.

We hope that you consider the comments outlined above. Grubhub looks forward to continuing working with DCWP to make sure New York City is a safe and equitable place for all couriers.

**BEFORE THE NEW YORK CITY
DEPARTMENT OF CONSUMER AND WORKER PROTECTION**

**Proposed Amendments to the Rules
Related to Contracted Delivery Workers**

Public Hearing: December 8, 2025

COMMENTS OF UBER TECHNOLOGIES, INC.

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175 Greenwich St., Fl. 47
New York, NY 10007
Email: ndavoli@uber.com

Attorney for Uber Technologies, Inc.

I. Introduction

Uber¹ appreciates the opportunity to submit this Comment to the Department of Consumer and Worker Protection (“DCWP” or the “Department”) concerning the Department’s amendments to Subchapter H of Chapter 7 of Title 6 of the Rules of the City of New York (the “proposed amendments”).

As a preliminary matter, Uber continues to support fair, transparent, and flexible earnings for all contracted delivery workers utilizing the Uber platform in New York City. To that end, Uber has already provided grocery delivery workers with the same earnings protections currently afforded to restaurant delivery workers. Uber applauds the Department’s ongoing efforts to ensure earnings parity for all contracted delivery workers.

However, several of the provisions discussed below are not “narrowly drawn to achieve [their] stated purpose,” as required by the City Charter. Therefore, this comment focuses on the

¹ “Uber” herein refers to Uber Technologies, Inc., its affiliates and subsidiaries, including but not limited to Portier, LLC. Portier, LLC is an online marketplace that connects licensed merchants and food retail partners with prospective customers and independent delivery service providers who seek, receive, and fulfill requests for food delivery services. Portier, LLC is a wholly-owned subsidiary of Uber Technologies, Inc. and operates under the brand name “Uber Eats.” Portier, LLC maintains a Third Party Food Delivery Service License issued by the Department of Consumer and Worker Protection.

administrative burden, technical infeasibility, and potential negative impacts on worker experience stemming from those specific aspects of the proposed amendments.

II. RETROACTIVE REQUIREMENTS ARE ARBITRARY AND CAPRICIOUS

While Uber acknowledges the requirement to produce reports for periods dating back to January 2022, the proposed rules grant the Department the authority to prescribe *new* formatting and layouts for these historical records. Requiring delivery services to retroactively re-process and re-format years of historical data to match a newly prescribed layout is unduly burdensome.

Data structures evolve over time; enforcing a 2026 reporting standard on historical data is likely to require significant engineering resources to build "Extract, Transform, and Load" (ETL) pipelines for closed periods. Uber respectfully requests that any specific formatting prescriptions apply **only to data collected after the effective date** of the proposed amendments.

Requiring retroactive re-formatting of closed records would be extremely time- and labor-intensive, and any benefit derived by DCWP would be unlikely to outweigh the burden. Administrative rules that impose onerous and costly requirements without proportionate public benefit are **arbitrary and capricious** by definition.

Additionally, even with respect to prospective reporting, Uber notes that data reporting changes traditionally take at least 6 to 8 weeks to ensure accuracy and compliance with new production requirements. Here, DCWP has proposed sweeping revisions to the data currently provided on a monthly basis that Uber will not be able to implement in conjunction with the January 26, 2026 effective dates of Local Laws 95, 107, 108, 113, 123, and 124 of 2025.

III. VISUAL RETENTION REQUIREMENTS ARE TECHNOLOGICALLY PROHIBITIVE

The proposed amendments call for the creation and retention of reports and materials not currently available or maintained by Uber. Notably, the proposed amendments would require Uber to retain copies of delivery offers/assignments "**in the form in which [they were] communicated**" to contracted delivery workers.

Uber facilitates nearly 2 million deliveries each week. With worker acceptance rates varying between 30–45%, Uber sends nearly 4.5 million offers each week. Requiring the retention of visual copies of these offers for a three-year period creates an onerous data storage requirement (billions of data points over three years). This is technologically prohibitive and adds massive, unnecessary data storage and retrieval costs.

The requirement to retain a copy of the offer "in the form in which it was communicated" essentially demands a visual reproduction or snapshot of every transient screen or notification sent to a worker's device. This goes far beyond standard record-keeping of transactional data. Retaining the underlying metadata—which Uber already does—is sufficient to verify compliance with disclosure requirements.

Demanding the retention of the visual "form" of the communication provides no additional regulatory value while imposing exponential storage costs and technical complexity. For the avoidance of doubt, Uber does not retain copies of the offer cards in the form communicated to contracted delivery workers. Rather, metadata from those offers—including the estimated time and distance, consumer gratuity (if any), merchant information, and other operationally necessary information—is retained and can be produced in a format accessible to DCWP.

IV. GEOSPATIAL DATA RETENTION CREATES PRIVACY RISKS AND REDUNDANCY

Beyond the individual offer cards, the proposed amendment to § 7-805(c)(4)(iii) mandates the retention of a "sequence of latitude and longitude coordinates" for the route generated for *every* trip offer, regardless of acceptance.

Such a requirement would create a staggering volume of geospatial data. Storing the precise "breadcrumb" sequence of GPS coordinates for millions of proposed routes per week is technologically burdensome and mathematically redundant. Furthermore, the recording and transmission of such granular location data for millions of actual and potential deliveries creates significant privacy concerns for both workers and consumers. Aggregating this data effectively creates a database of precise movement patterns, individual homes, workplaces, and other sensitive locations across New York City.

Uber submits that this “breadcrumb” data should be limited to the actual route taken by a contracted delivery worker for any given delivery, with exact pickup and drop-off locations obfuscated to protect user privacy. As drafted, the proposed amendments would allow for the identification of consumer home and workplace locations, merchant volumes, and the location of each contracted delivery worker anytime they access the platform, regardless of trip activity.

V. "DIRECT DISTANCE" METRICS CREATE WORKER CONFUSION AND SAFETY RISKS

The proposed amendments also require delivery services to calculate, record, and disclose the “direct distance” (defined as “as-the-crow-flies”) between pickup and drop-off locations. There is no but-for world in which such calculations are relevant. Contracted delivery workers cannot travel in a straight line through buildings or other three-dimensional objects.

Calculating and storing “direct distance” requires a separate, unique geospatial calculation for every single offer that differs from the “routed distance” actually used to determine worker pay and time estimates. Because “direct distance” is not used to calculate minimum pay or trip time, mandating its creation and storage adds computational overhead without aiding the Department in verifying compliance.

More importantly, mandating its display clutters the interface with “junk data” that distracts from vital information (Pay and Routed Distance). The “routed distance” is the true measure of effort expected for contracted workers and the data point most relevant to trip acceptance. Presenting two distance figures simultaneously in a decision-making environment creates confusion and could lead to worker frustration or delayed acceptance.

By forcing the inclusion of dual distance metrics alongside other required disclosures, the Department is effectively mandating a “wall of text” on a small screen. This increases cognitive load and distracts workers. Uber proposes that offer card information continue to be limited to the routed distance, while services can provide an additional notice to contracted workers that their maximum distance preference is measured by direct distance.

VI. FORCED DISCLOSURE OF SOURCE CODE AND DEVICE DATA IS UNSAFE AND OVERBROAD

Uber notes that the proposed amendments to § 7-805(c)(12) require the retention of "*application source code, version control logs documenting changes to source code,*" and "*software specifications.*" This requirement raises significant concerns regarding Intellectual Property and trade secret protection.

Uber's source code and algorithmic logic are proprietary trade secrets that it takes great pains to keep out of the hands of competitors. Compelling the retention and potential production of raw source code and version control logs is an extraordinary measure not narrowly drawn to achieve the Department's stated purpose of enforcing minimum pay standards. The Department can effectively audit compliance through data outputs (delivery logs and pay records) without requiring access to the sensitive underlying code that powers Uber's global platform.

Likewise, requiring delivery services to record and report the "*manufacturer, name, and model number of the phone*" for every span of on-call and trip time is irrelevant to calculating minimum pay and introduces unnecessary cybersecurity risks. Detailed device identifiers can enable targeted attacks and exploitation of device-specific vulnerabilities. Storing and potentially producing this sensitive technical information unnecessarily puts both workers and the Department at risk.

VII. REPORTING STANDARDS MUST REFLECT OPERATIONAL REALITY

Finally, Uber encourages DCWP to refine the record-keeping and reporting specifications to establish standardized, segmented streams reflecting the distinct audiences for the data. Specifically, the rules should distinguish between:

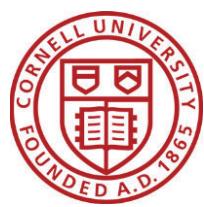
- **Worker-facing data** (e.g., offer card disclosures);
- **Consumer-facing data** (e.g., customer fees and checkout screens); and
- **Backend proprietary metadata** that is not visible to the public.

Commingling these distinct categories into a single, flat reporting structure creates confusion and sheds no light on the actual user experience. Furthermore, the reporting standards must explicitly account for 'batched' or 'stacked' offers, i.e., instances where a single trip

encompasses multiple deliveries. In a batched scenario, the trip time and routed distance for individual orders naturally overlap. Without a standardized mechanism to link multiple 'Order IDs' to a single parent 'Batch/Trip ID,' simple line-item reporting will result in the artificial duplication of time and mileage data, rendering the reports inaccurate.

VIII. CONCLUSION

Uber remains committed to transparency and compliance with the Minimum Pay standard. However, the proposed record-keeping amendments shift the focus from verifiable wage outcomes to an invasive and technologically prohibitive collection of raw data, source code, and visual artifacts. We urge the Department to reconsider these specific provisions to ensure the rules are "narrowly drawn to achieve [their] stated purpose" without imposing undue burdens and risk on the regulated community. Uber remains available to discuss these concerns and the proposed amendments with the Department at any time.



December 8, 2025

2023, New York City Department of Consumer and Worker Protection—Public Hearing on Rules for a Minimum Pay for App-Based Grocery Delivery Workers

Testimony by Andrew B. Wolf, PhD. Assistant Professor. Department of Global Labor & Work. Cornell University, School of Industrial Labor Relations.

My name is Andrew Wolf and I am an assistant professor of Industrial Labor Relations at Cornell University. I am a labor sociologist who focuses on the impact of the gig economy's entry into immigrant dominated occupations in New York City. I was a member of the research team that conducted a survey of employment conditions faced by app delivery workers published by the Cornell Workers Institute and which the New York City Council cited in their original law establishing that the Department of Consumer and Worker Protection (DCWP) create methods for determining the minimum payments that must be made to platform food delivery workers, as required by New York City Administrative Code § 20-1522.

I am writing in support of rules relating to Local Laws 95, 107, 108, 113, 123, and 124 of 2025 to extend minimum wage and other standards to app-based grocery delivery workers. In doing so these laws and rules importantly extend protections to a large segment of app-based workers whose work is substantively identical to their peers but who have been excluded from the initial protections.

This proposed rule which would establish a minimum wage for app grocery delivery workers is an essential first step in ensuring that these gig workers are treated with dignity, respect, and are paid a fair wage. These rules will extend labor rights to 20,000 app workers in the City, most of whom work for Instacart. These workers currently earn as little as \$5-\$7 per hour. The app companies will claim wages are much higher but that is because the companies incorrectly and deceptively calculate workers working time. The app companies believe workers should only be paid for active time, the time the worker is doing an order, not their engaged time, which is the time the worker spends logged on to the app. Previous research by the NYC DCWP has shown that waiting time can account for as much as 40% of a workers' day. We would not suggest a firefighter, police officer, nurse, or waiter not be paid for on-call waiting time. On-call time is part of many jobs and has long been conserved paid time under employment law. It is essentially that we do not carve immigrant app-delivery workers out of such standard employment law protections.

It is important that grocery delivery workers be covered by the app delivery worker minimum wage because their work is substantively similar to app-food delivery workers and therefore should not have been excluded from coverage in the first place. Just like food delivery workers, grocery delivery workers:

- Time spent on-call, working a delivery, and engagement with the app is similar.

- Their trip time follows a similar pattern with the worker needed to begin working an order immediately upon receiving an order
- They face the same systems of algorithmic management directing when, where, and how their work will be performed
- They face the same risks of punishment and deactivation due to opaque algorithmic standards and potentially pernicious customer reviews.

Additionally, in other jurisdictions with minimum standards for app-workers, such as Seattle, no distinction is made between app delivery and app grocery workers in term of law coverage and operation.

The proposed rules under consideration today would go a long way to rectifying the history of poor treatment and affirm that app grocery delivery workers deserve rights and a decent living.

I support the establishment of a fair minimum pay proposal by the DCWP and I urge the City of New York to quickly implement these protections to ensure delivery workers are actually paid a living wage as soon as possible and without further delay.

Sincerely,
Andrew B. Wolf, PhD
Assistant Professor
Department of Global Labor & Work
Cornell University
School of Industrial Labor Relations



Center for
New York City
Affairs

**Testimony Submitted to the
New York City Department of Consumer and Worker Protection**

**Hearing on
November 8 proposed rule to extend the contract delivery worker minimum
pay standard to grocery delivery workers**

December 8, 2025

**James A. Parrott, PhD
Senior Advisor and Senior Fellow
Center for New York City Affairs at The New School**

My name is James Parrott, Senior Advisor and Senior Fellow at the Center for New York City Affairs at The New School. Thank you for the opportunity to testify in support of the proposed rule to extend the delivery minimum pay standard to delivery workers engaged by third-party grocery delivery services.

For several years, I have worked closely with the City and other jurisdictions in regulating the treatment of workers by app-based gig companies in the rideshare and delivery fields. Along with Professor Michael Reich of the University of California, Berkeley, I was co-author of the 2018 and 2019 studies that were the basis for the New York City Taxi and Limousine Commission (TLC) minimum pay standard applied to Uber and Lyft drivers.¹ Professor Reich and I also prepared similar reports for the City of Seattle in 2020 and the State of Minnesota in 2024 that informed rideshare driver pay standards.²

¹ James Parrott and Michael Reich, An Earnings Standard for New York City's App-based Drivers: Economic Analysis and Policy Assessment, Report for the New York City Taxi and Limousine Commission, Center for New York City Affairs, July 2018. <http://www.centernyc.org/an-earnings-standard>; and James Parrott, Michael Reich, Jason Rochford, and Xingxing Yang, The New York City App-based Driver Pay Standard: Revised Estimates for the new Pay Requirement, Report for the New York City Taxi and Limousine Commission, Center for New York City Affairs, January 2019. https://www.centernyc.org/the-new-york-city-app-based-driver-pay-standard-revised?mc_cid=80c36c5e43&mc_eid=f076c27c0e

² James Parrott and Michael Reich, A Minimum Compensation Standard for Seattle TNC Drivers, Report for the City of Seattle, Center for New York City Affairs, July 2020; James Parrott and Michael Reich, Transportation Network Company Driver Earnings Analysis and Pay Standard Options, Prepared for the Minnesota Department of Labor and Industry, March 8, 2004.

https://www.dli.mn.gov/sites/default/files/pdf/TNC_driver_earnings_analysis_pay_standard_options_report_030824.pdf

Last year, the TLC commissioned me to prepare an analysis of how the composition of driver vehicle expenses had changed since the inception of the pay standard. On June 25, 2025, the TLC adopted a revised rideshare pay rule based on my December 2024 and April 2025 reports.³

I also served in 2022 as a consultant to the City's Department of Consumer and Worker Protection (DCWP) on the study that analyzed restaurant delivery and that laid the foundation for the minimum compensation standard for restaurant delivery workers that has been in effect since December 2023.⁴

As a labor economist, I have closely followed developments regarding platform-based gig workers in New York City and around the nation, and have delivered several professional conference presentations on the working conditions and compensation for rideshare and delivery workers. I wrote an [op-ed published on September 10 in the New York Daily News](#) in support of the City Council's override of the Mayor's veto of Intro 1135 that became Local Law 124.⁵

I support the proposed rule to extend the delivery minimum pay standard to workers engaged by third-party grocery delivery services. Grocery delivery and restaurant delivery workers are similarly treated by the online platforms that engage them as independent contractors, and similarly subject to algorithmic management through an app created by companies with basically similar business models. Working conditions are substantially similar for third-party restaurant delivery and grocery delivery services.

Given their treatment by online labor platform companies as independent contractors, neither third-party restaurant delivery nor grocery delivery workers are employees covered by the Fair Labor Standards Act. As such, these workers are not subject to the federal or New York State minimum wage laws. Nor are these two categories of delivery workers generally covered by state unemployment insurance or workers' compensation insurance.⁶

The DCWP third-party contracted delivery worker minimum pay requirement ensures that these delivery workers receive a minimum level of compensation intended to provide at least the

³ NYC TLC, [Revised Driver Pay Rules Adopted June 25, 2025](#); James A. Parrott, [Revised Expense Model for the NYC Taxi and Limousine Commission's High-volume For Hire Vehicle Minimum Pay Standard](#), Report for the New York City Taxi and Limousine Commission, December 2024; and James A. Parrott, [CNYCA Supplemental Expense Report](#) for the New York City Taxi and Limousine Commission, April 2025.

⁴ New York City Department of Consumer and Worker Protection, [A Minimum Pay Rate for App-Based Restaurant Delivery Workers in NYC](#), November 2022.

⁵ My website, [jamesparrott.net](#), provides links to various reports, op-eds and press coverage.

⁶ Pursuant to a November 2023 settlement between the New York State Labor Department and Uber Technologies, Inc., UberEats delivery workers are covered by unemployment insurance. Rideshare drivers for Uber and Lyft have workers' compensation coverage through the Black Car Fund.

independent contractor equivalent of the State minimum wage, including a component for employer payments for Social Security and Medicare taxes, and components for paid time off, and the employer cost of workers compensation. The minimum pay requirement also includes a factor intended to partially offset delivery worker expenses for providing their own means of transportation and for smart phone-related expenses since a phone is needed to access the delivery service app.⁷

(In an Appendix, I present a summary analysis of the impact of the restaurant delivery worker pay standard on consumers, workers and the companies.)

Working conditions are very similar for both third-party restaurant and grocery delivery workers. Both sign on to an app to signal their availability for deliveries, receive delivery offers through the app, indicate their acceptance or rejection of those offers through the app, travel to the restaurant or grocery store to pick up the order, deliver the order to the customer location, navigate the same traffic and environmental conditions on city streets, and then return to a waiting area to receive additional dispatch offers.

The only difference in the working conditions is that a third-party delivery worker often also shops at the grocery store to put together the grocery delivery order. Whether shopping for or delivering groceries, grocery delivery workers are subject to the same form of algorithmic management and should be compensated by the delivery service for time spent shopping in the same manner they are compensated for delivering the order.

Local Law 124 appropriately specifies that payments to grocery delivery workers “meet or exceed the minimum pay requirements for food delivery workers” and authorizes DCWP to modify the minimum payment level for grocery delivery workers if warranted.⁸ According to Instacart, the leading third-party grocery delivery company in the city, the majority of its delivery workers use a motor vehicle.⁹ Since it is likely that many grocery delivery workers use automobiles for delivery, expenses for these workers almost certainly exceed those of restaurant delivery workers, and they should be compensated accordingly by the app companies. According to the DCWP 2022 delivery worker report, 44 percent of restaurant delivery workers used automobiles but only 22 percent of deliveries were by automobile, and automobile expenses as

⁷ The components of the delivery worker pay standard are spelled out in section 5 of New York City Department of Consumer and Worker Protection, [A Minimum Pay Rate for App-Based Restaurant Delivery Workers in NYC](#), November 2022.

⁸ Local Law 124 (2025).

⁹ *Maplebear, Inc., d/b/a Instacart v. City of New York*, Case No. 1:25-cv-09979 (S.D.N.Y. Dec. 2, 2025), p. 8.

estimated by DCWP were nearly twice that for e-bikes (which accounted for two-thirds of restaurant deliveries).¹⁰

The fact that most Instacart delivery workers use vehicles as opposed to e-bikes is not indicative of a substantial difference in working conditions that would argue against the applicability of the delivery worker pay standard. In fact, the delivery worker pay standard was explicitly modeled by DCWP after the New York City Taxi and Limousine Commission's minimum pay standard for app-dispatched rideshare drivers that was exclusively based on the use of motor vehicles.

As a close student of app-dispatched gig worker labor and compensation practices, it is clear to me that a restaurant delivery pay standard for primarily e-bike using gig workers modeled after a rideshare pay standard designed for gig worker automobile drivers is also suitable for automobile-using grocery delivery gig workers. The companies subject to these New York City pay standards—Uber (and Uber Eats), Lyft, DoorDash, GrubHub, and Instacart, among others—all employ similar business models and use similar app-based algorithmic management tools and treat drivers and delivery workers as independent contractors.

Considering these app-based delivery and rideshare companies as part and parcel of a single group of companies with basic characteristics in common is a hallmark of the data analytics work published by Gridwise, a nationally-prominent company that offers an app for use by app-dispatched delivery and rideshare workers to track their work activity and earnings. Gridwise features the six rideshare and delivery companies named above, including Instacart, in its analyses of delivery worker earnings. Gridwise's analysis that groups restaurant and grocery delivery work together is clearly premised on similarities in working conditions and company business models. In analyzing data from drivers that utilize their app, Gridwise estimates that for any given hour during the day 44-56 percent of Instacart drivers also seek work on restaurant delivery and Uber and Lyft rideshare apps.¹¹ The fact that so many Instacart workers regularly work for other delivery and rideshare apps underscores the similarity in working conditions.

New York City has led the nation in improving working conditions and pay for drivers and delivery workers engaged by the major labor platforms. This proposed rule is the latest well-reasoned step in this important regulatory process. I urge that the Department adopt this rule.

Thank you for the opportunity to present my perspective.

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¹⁰ New York City Department of Consumer and Worker Protection, [A Minimum Pay Rate for App-Based Restaurant Delivery Workers in NYC](#), November 2022, p. 14.

¹¹ <https://gridwise.io/blog/analytics/multi-apps-role-in-pay-and-platform-power/>

Appendix

Summary Analysis of New York City's Delivery Worker Pay Standard through the Second Quarter 2025

Using data published on the DCWP website, this analysis compares changes in common metrics for the four most recent quarters of data (Q3 2024-Q2 2025) to the four quarters before the pay standard took effect in December 2023 (Q4 2022-Q3 2023) to provide a clear before vs. after picture.¹² This analysis is useful to inform questions regarding the pay standard's impact on consumers, delivery workers, and the delivery app companies.

- Total weekly orders have increased by 16 percent.
- On a per delivery basis, worker pay (not counting tips) has more than doubled, rising by 103 percent.
- Average worker earnings combining company pay plus consumer tips have risen by 16 percent per order. Since the app companies made it harder to tip delivery workers, tips have declined by 69 percent. But, overall, worker earnings per order are higher by 16 percent.
- Although the app companies increased consumer fees per order by 49 percent, the total amount consumers pay in fees and tips actually declined by 4 percent per order. Company claims that consumers are paying more overall are not supported by the data.
- The company “take” based on the fees charged to consumers and restaurants – that is, the amount the companies pocket after paying delivery workers -- now averages \$4.84 per order. The company take is 38 percent of total fees, compared to an extraordinary 61 percent before the pay standard.
- While the number of restaurant delivery workers performing trips has declined by 15 percent that reflects the fact that the delivery platforms had allowed an excessive number of workers onto their apps relative to the extent of consumer demand for delivery orders. In different ways, the two payment methods specified in the DCWP rules compel the delivery companies to factor in all of workers’ time on the app in determining pay. City Council Intro 1332 should be enacted into law to protect workers from unjust deactivation and lockouts.

This brief data summary clearly indicates that the restaurant delivery industry pay standard is working as intended in lifting worker compensation without burdening consumers, and that the app companies continue to prosper. The number of delivery orders continues to rise while there is better alignment between the number of workers performing trips and the extent of consumer demand. The companies should better manage the number of workers on their platforms rather than locking workers out.

Prepared by James Parrott, Center for New York City Affairs at The New School, December 2025. parrottj@newschool.edu; jamesparrott.net

¹² Seasonal patterns vary depending on the quarter so grouping four quarters of data together and using the average smooths out seasonal trends over the course of a 12-month period.



December 8, 2025

**Testimony of Nelson Eusebio
Director of Government Affairs
National Supermarket Association (NSA)**

Regarding

Rules Relating to Contracted Delivery Workers

Good morning, and thank you for the opportunity to give testimony on the rules relating to contracted delivery workers.

My name is Nelson Eusebio, and I'm the Director of Government Affairs for the National Supermarket Association (NSA), and we represent more than 600 independently owned grocery stores across New York City.

Our members are not big corporations. They're minority- and family-owned stores. They're small business owners who work hard everyday to serve their neighborhoods.

Right now, independent grocers are struggling like never before. Costs are rising: rent, energy, insurance, and payroll. Competition from national chains is intense as big box stores have far greater resources and have an established delivery infrastructure.

That's why third-party delivery platforms have become so important. They help small supermarkets reach seniors, working families, and people with disabilities. Without these services, many New Yorkers would lack access to food and independent grocers will not be able to remain competitive.

The proposed rules before us today would make it dramatically more expensive for small grocers to use these platforms. And here's the truth: they can't absorb those costs. Every added fee will get passed down, either to the store owners who already face thin margins, or to the customers who we know are struggling with high grocery prices.

So today, I'm asking the DCWP to not adopt these rules as written. Instead, the DCWP should consider alternative approaches that protect delivery workers without increasing costs for consumers or undermining the viability of independent supermarkets.

Thank you for your time and for listening. We remain committed to working with the Department to develop solutions that support workers while preserving affordable food access for New Yorkers, and we welcome any continued dialogue.



Hotel and Gaming Trades Council, AFL-CIO • 707 Eighth Avenue, New York, NY 10036 • Telephone (212) 245-8100 • www.hotelworkers.org

December 8, 2025

Commissioner Vilda Vera Mayuga
New York City Department of Consumer and Worker Protection
42 Broadway
New York, NY 10004

Dear Commissioner Mayuga:

I write to you in support of the proposed rule change to section 5-59 of subchapter B of chapter 6 of title 6 of the Rules of the City of New York, "Restaurant Surcharges."

The Hotel and Gaming Trades Council represents food and beverage workers in the City. In other jurisdictions, it is common for food and beverage workers to bargain with their employers for mandatory gratuities on restaurant bills and banquet contracts. These gratuities are a key component of these workers' compensation, and are conspicuously advertised at the relevant establishments. This proposed rule change would offer clarity on the City's view of these bargained-for gratuities.

I commend the Department for its attention both to the rights of consumers to fair and transparent pricing and to the rights of workers to bargain with their employers for appropriate compensation. I believe the proposed rules provide clear and enforceable directives to restaurant employers in the City. The Hotel and Gaming Trades Council wholeheartedly endorses these changes.

Sincerely,

Rich Maroko

President, Hotel and Gaming Trades Council, AFL-CIO

December 8, 2025

New York City Department of Consumer and Worker Protection
Consumer Services Division
42 Broadway, 9th Floor
New York, NY 10004

RE: Rules relating to contracted delivery workers

Dear Commissioner Mayuga:

The Retail Council of New York State is the state's leading trade group for the retail industry, representing member stores in New York City and across the state, ranging from the smallest independent merchants to national and international brands.

We appreciate the opportunity to comment on the proposed rules related to contracted delivery workers. Specifically, we would like to provide our perspective on implementation, notification, recordkeeping and other requirements.

Implementation

Due to the complexity of the changes and the significant technical development involved in meeting the original compliance requirements, we respectfully request a 60-day extension to the original compliance deadline of January 26, 2026.

In addition, we request clarification on the expected implementation timeframe for the new requirements, if approved.

§ 7-804 Notice of Rights; § 7-805 Recordkeeping (Pages 9-10)

We submit for your consideration the following questions regarding the "notice of rights":

- When will the Notice of Rights be published?
- Does the proposed rule require that the notice of rights be sent via both email and text message, in addition to being available in the app?
- If email and text are required, will the city provide a template or standardized language for the notice?
- Will there be any flexibility for platforms that currently provide notices through in-app notifications?

§ 7-805 Recordkeeping (and reporting) (Pages 9–15)

We submit for your consideration the following questions related to reporting:

- Under the proposed rules, would Spark be subject to the expanded reporting requirements for “contracted delivery workers”?
- If reporting is required, what specific data points will need to be included, and will they align with the record-keeping requirements listed on these pages?
- Is there a defined timeline or frequency for reporting beyond “no more frequent than monthly,” or will this be determined case by case?
- Will the department provide advance notice or a standardized format for these reporting requests?

§ 7-806 Delivery Distance and Route (Pages 15–18)

We submit for your consideration the following issues related to distance requirements:

- Please clarify whether the proposed rule would require covered entities to calculate and disclose both route distance and direct (“as the crow flies”) distance for each trip.
- Will there be specific guidance or a formula for calculating direct distance to ensure consistency across platforms?

Thank you for the opportunity to comment on DCWP’s proposal to amend the rules regarding contracted delivery workers. We encourage the department to consider our perspective during the regulatory process. If you would like to discuss further, please contact us at (518) 465-3586.

Respectfully submitted,



Kelsey Dorado Bobersky
Director of State and Local Government Relations
Retail Council of New York State



**TRANSPORTATION
ALTERNATIVES**

**Public Comment on Proposed Rules Relating to Contracted Delivery
by Transportation Alternatives**

December 8, 2025

Transportation Alternatives submits public comment in support of DCWP's proposed rule relating to contracted delivery services and implementing a series of local laws creating protections for contracted delivery workers. Transportation Alternatives supports the expansion of the minimum pay standard to grocery delivery workers. Such workers deserve pay parity with other food delivery workers as well as similar worker protections passed this calendar year. Safe workplaces are safe streets, and Transportation Alternatives additionally calls on the City Council to continue to support delivery workers by passing Intro 1332, which will protect workers against unjust deactivations and support safe practices.

**Testimony of the CUNY Urban Food Policy Institute
Before the NYC Department of Consumer and Worker Protection
Public Hearing on Proposed Rules Relating to Contracted Delivery Workers**

Nevin Cohen, Director
December 8, 2025

Thank you for the opportunity to testify in strong support of the Department of Consumer and Worker Protection's proposed rules implementing Local Laws 95, 107, 108, 113, 123, and 124 of 2025. These rules are an important step toward a more just, transparent, and safe system of work for the tens of thousands of contracted delivery workers, including grocery delivery workers, who increasingly sustain New York City's food landscape.

The package of bills enacted in 2025 recognized what delivery workers have asserted for years: they face uncompensated expenses, low and unpredictable pay, and demanding physical conditions, despite playing a critical role in getting food and essential goods to New Yorkers. The proposed rules translate these legislative principles into practical, enforceable mechanisms that will meaningfully improve workers' daily lives.

Guaranteed Minimum Pay and Fair Compensation

The most significant change for grocery delivery workers comes from the implementation of Local Law 124, which extends minimum pay protections to their sector. The proposed rules apply the same methodology used for food delivery workers to grocery delivery work and reflect the finding that the two jobs involve substantially similar tasks and expenses. This means grocery delivery workers will no longer rely solely on unpredictable per order payments. Instead, they will receive compensation at or above the city established minimum rate.

For workers, this change is transformative. Many must travel long distances, shop for and assemble orders, navigate stairwells and building entry issues, and transport heavy goods. Minimum pay ensures that the time and labor spent waiting, traveling, and delivering are recognized and compensated in a way that approximates the protections available to employees, something previously unavailable to most grocery delivery workers.

Protected Access to Gratuities and Transparency in Tipping

Under Local Laws 107 and 108, implemented through these rules, platforms must provide customers with the opportunity to tip before or at checkout, restoring transparency and preventing hidden interface changes that have previously caused steep declines in worker gratuities. For grocery delivery workers, whose base pay has historically been insufficient, consistent access to tipping opportunities directly affects their rent, household food budgets, and financial stability.

Clear Pay Statements and the Ability to Contest Underpayment

Local Law 113 ensures that workers receive detailed written pay statements showing how compensation, including minimum pay, bonuses, and gratuities, was calculated. The proposed rules operationalize this requirement by mandating disclosure of every component needed for workers to verify accuracy. This strengthens workers' ability to identify underpayments, advocate for themselves, and understand how different platforms structure their earnings. In practice, this means that a grocery delivery worker can finally see: how the minimum pay rule was applied to their hours; what portion of their earnings came from gratuities; whether any deductions were taken; and whether the platform's calculations align with legal requirements. Such transparency is essential in a sector that has long been marked by opaque pay practices.

Reduced Equipment Burdens and Safer Working Conditions

Although Local Law 124 does not explicitly address equipment, its integration into the broader delivery worker framework means that grocery delivery workers benefit from protections relating to insulated food delivery bags, disclosures on trip distance and route, and safeguards against retaliatory deactivation. These rules help address the physical strain of carrying groceries, the dangers associated with long and complicated routes, and the risk of losing access to work for asserting legal rights.

Greater Stability and Predictability in a Precarious Sector

Perhaps most importantly, these rules help stabilize a form of work defined by precarity. By guaranteeing minimum pay, standardizing tipping practices, requiring timely payments, and mandating access to essential information, the rules reduce income volatility. Workers can better anticipate earnings, budget more reliably, and face fewer situations in which they must choose between unsafe work and economic survival.

Conclusion

The proposed rules give grocery delivery workers what they have long lacked: recognition that their labor is essential, and a set of protections that respond to the real conditions of their work. The CUNY Urban Food Policy Institute strongly supports adoption of the rules and views them as critical to advancing fairness, safety, and economic stability across New York City's food delivery sector.

Thank you for the opportunity to comment.



Consortium for Worker Education

305 Seventh Ave, Third Floor, New York, NY 10001
212.647.1900 | www.cwe.org

Support for Rule Change to Local Law 124 to Extend Minimum Pay Standards to Grocery Delivery Workers

Dear Department of Consumer and Worker Protection,

I am writing on behalf of the Consortium for Worker Education (CWE), which provides education, training, and child care services to over 30,000 New York City workers each year, to express our strong support for the proposed rule change to Local Law 124. CWE has been actively involved in addressing the needs of gig workers and conducting research on this sector of the workforce.

Last year we published the largest neighborhood-focused [study of the gig workforce](#) to date, interviewing over 400 gig workers based in Western Queens. In general, workers reported high rates of economic precarity and reliance on social assistance. Far from being a way to earn some extra income on the side, we found half of the gig workforce depended on gig work to meet their basic needs. Additionally, nearly half of delivery workers surveyed reported having filed a labor complaint.

Local Law 124 represents a strong step in increasing protections and standards for food delivery workers. This proposed rule change would rightfully extend minimum pay standards to grocery delivery workers, who deserve the same rights extended to other food delivery workers in New York City. We strongly encourage the adoption of the proposed rule change.

Sincerely,

Marco A. Carrión
President, Consortium for Worker Education



THE COUNCIL
OF
THE CITY OF NEW YORK
COMMON SENSE CAUCUS

December 8, 2025

Vilda Vera Mayuga
Commissioner Department of Consumer and Worker Protection
45 Broadway
New York, NY 10004

Dear Commissioner Mayuga,

As Members of the City Council Common Sense Caucus, we are writing regarding proposed rules for Local 124 of 2025, in relation to minimum payments to grocery delivery workers.

As you may know, grocery delivery apps provide tens of thousands of New Yorkers with an opportunity to earn money by shopping for and delivering groceries on their own schedules. This type of work allows them to earn extra or supplemental income while balancing other responsibilities, such as family and education.

However, Local Law 124 will impose a rigid “utilization” rate that could eliminate the flexibility that these New Yorkers value, and, rather than protect their livelihoods, limit their opportunities to work and their incomes, while also raising the delivery cost for customers.

Under this legislation, grocery delivery platforms would be required to compensate their workers once they log in to the apps, even when they are not actively shopping or delivering. As a result, apps such as Instacart have said they would be forced to impose “advanced scheduling” on their workers, and restrict how many shoppers can be online at any time.

This legislation is also projected to increase grocery delivery charges by nearly 50 percent, which would have a devastating impact on the working families and seniors who have come to depend on these services and are already burdened by the skyrocketing cost of living in one of the most expensive cities in the world. These rising costs will also hurt local grocery stores across the outerboroughs, who could be forced to scale back deliveries or eliminate them altogether. These “mom-and-pop” businesses already operate on the slimmest of margins and are increasingly losing customers to national chains.

Furthermore, there are questions as to whether this legislation violates state and federal law, which preempts cities from imposing certain restrictions on delivery services. Local Law 124, along with several other bills that regulate food delivery services, is the subject of an ongoing lawsuit.

We support paying workers a fair wage, but imposing a utilization formula would only hurt those workers, their customers and our neighborhood grocers. That is why we urge the Department to exclude the utilization standard from the final rulemaking process.

Thank you for your time and consideration.

Sincerely,



Joann Ariola
Co-Chair, Council District 32



Robert F. Holden
Co-Chair, Council District 30



Vickie Paladino
Council District 19



David Carr
Council District 50



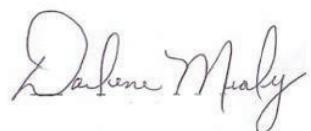
Inna Vernikov
Council District 48



Frank Morano
Council District 50



Kristy Marmorato
Council District 13



Darlene Mealy
Council District 41

The New York City Council Common Sense Caucus

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Michelle Stoddart

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Henry Wan

Daniel Zausner

Commissioner Vilda Vera Mayuga

Department of Consumer and Worker Protection

42 Broadway

New York, NY 10004

Dear Commissioner Mayuga:

We write to express our concern with Local Law 124 of 2025 and the expansion of utilization-based standards across the food service and grocery industries. We believe this legislation and the earnings standard it seeks to replicate will do more harm than good, hurting workers, small businesses, and consumers alike. In short, if Local Law 124 is implemented with similar rules to Local Law 115 of 2021, not only will countless New Yorkers face higher costs for grocery delivery, but thousands of grocery delivery workers will lose access to valuable earning opportunities.

Impact on Grocers and Consumers

As advocates dedicated to empowering businesses and bolstering the city's local economy, our Chambers are deeply concerned about the recently passed Local Law. It has significant potential to increase up costs for both businesses and consumers alike, while also introducing unintended consequences on delivery workers.

As you may know, grocery retail is already one of the most economically strained sectors in the city, with profit margins as low as 1.6% and commercial rents rising at unsustainable levels – over 30% in some communities.

Independent grocers, many of whom operate in underserved communities, are already operating under extreme financial pressure.

If implemented in a similar manner to Local Law 115 of 2021, Local Law 124 of 2025 risks compounding this pressure by imposing an unworkable pay standard that would further increase the cost of doing business. The very survival of these grocers often depends on their ability to use online platforms to reach customers in food deserts and compete with large retail chains. Burdening this system could ultimately push them out of business or severely restrict their ability to operate.

Meanwhile, food costs in the New York metropolitan area have risen dramatically – by more than 50% over the last decade – making it difficult for many families to afford basic necessities. A recent poll found that 53% of New Yorkers went into debt last year due to food costs. Saddling grocery deliveries with additional regulatory costs will only exacerbate this issue, with dangerous consequences for working New Yorkers.

Harm to Workers

DCWP's implementation of a utilization-based earnings standard for restaurant delivery workers led to widespread lockouts from major platforms like DoorDash and Uber, reducing opportunities for thousands of workers. These workers, many of whom transitioned to grocery delivery platforms, found new opportunity and flexibility in this sector. Local Law 124 would likely replicate those earlier harms, resulting in reduced hours, platform restrictions, and lower total earnings.



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Following the initial policy change for restaurant delivery workers, average consumer prices rose by 46%, while tip income for workers declined by 60%. This made delivery work less sustainable for many while restricting access to food for vulnerable New Yorkers. Expanding this type of pay standard to additional workers without fully understanding its broader impact would surely undermine the goal of this proposal.

A More Balanced Path Forward

We support the goal of providing fair and sustainable earnings for delivery workers. However, it's clear that the utilization-based standard imposed on food delivery companies has only hurt workers, small businesses, and consumers. We are concerned that applying a similar standard to grocery delivery will only double down on that failure and lead to the same unintended consequences.

That's why we strongly urge you to ensure that the new minimum pay standard for grocery delivery workers maintains flexibility by using an earnings-based model without a utilization component. This approach would align New York City with every other jurisdiction in North America that has implemented such standards and would help avoid repeating the same problems that have emerged in the city's restaurant delivery sector.

Many low-income neighborhoods still struggle with supermarket shortages, and small grocers have increasingly turned to delivery apps to reach customers. If enacted in its current form Local Law 124 would not only undermine the livelihoods of small business owners and delivery workers, but would also make it harder for everyday New Yorkers to access affordable, fresh groceries.

Instead, we encourage the Council and DCWP to reevaluate the earnings standard for both grocery and restaurant workers. We stand ready to collaborate on policy that uplifts workers, preserves small businesses, and protects consumers citywide.

Very truly yours,

A handwritten signature in black ink that reads "Thomas J. Grech".

Thomas Grech, President/CEO



December 8, 2025

Department of Consumer and Worker Protection
City of New York
42 Broadway
New York, NY 10004

RE: Comments on Proposed Rules Relating to Delivery Workers

Dear Commissioner Mayuga:

On behalf of The Five-Borough Chamber Alliance, we appreciate the opportunity to comment on the Department of Consumer and Worker Protection's proposed rules relating to contracted delivery workers. The Five-Borough Chamber Alliance includes the Bronx, Brooklyn, Manhattan, Staten Island, and Queens Chambers of Commerce, and represents most of the 200,000 small businesses throughout New York City. 85% of our membership consists of companies with ten or fewer employees; however, collectively these companies account for the majority of New York City's employment.

While we support clear, effective policies that provide meaningful information to delivery workers, several elements of the proposed rules introduce unnecessary complexity and would require substantial system overhauls with little demonstrated benefit. We highlight two primary concerns below.

Unnecessary Changes to Distance Disclosures and Distance Preferences The proposed rules would require delivery platforms to adopt new distance-related disclosures and to rebuild existing tools that workers already use to understand and manage trip length. These changes represent a significant departure from long-established industry practices and would force platforms to redesign core features that currently function effectively. We urge DCWP to avoid mandating changes that would substantially alter functioning systems unless there is clear evidence that such changes are necessary and will meaningfully strengthen worker protections. At a minimum, delivery platforms should have flexibility in how they convey information to workers so they can adopt approaches that are workable and avoid confusion.

Need for Sufficient Compliance Time

If the proposed changes are adopted, delivery platforms will need to redesign core functions of their applications, rebuild preference systems, and modify compliance processes. A 30-day

implementation period is not adequate for changes of this scope. Insufficient lead time increases the risk of unintended compliance gaps and creates unnecessary exposure to penalties, despite good-faith efforts to comply. We respectfully request that DCWP provide no fewer than 120 days for implementation following publication of the final rules.

Thank you for considering these comments. We look forward to working with DCWP to ensure that any final rules are practical, workable, and supportive of the City's delivery ecosystem – including workers, businesses, and the customers they serve.

Sincerely,

Lisa Sorin
President & Chief Executive Officer
Bronx Chamber

Randy Peers
President & Chief Executive Officer
Brooklyn Chamber

Jessica Walker
President & Chief Executive Officer
Manhattan Chamber

Linda Baran
President & Chief Executive Officer
Staten Island Chamber

Thomas Grech
President & Chief Executive Officer
Queens Chamber



**The
Business
Council**

December 8, 2025

Department of Consumer and Worker Protection
City of New York
42 Broadway
New York, NY 10004

Re: Comments on Proposed Rules Relating to Delivery Workers

Dear Commissioner Mayuga:

On behalf of The Business Council of NYS and its members, we appreciate the opportunity to comment on the Department of Consumer and Worker Protection's proposed rules relating to contracted delivery workers. The Business Council of NYS is the state chamber of commerce and manufacturers association for New York State, representing over 3,000 members companies and trade association.

While we support clear, effective policies that provide meaningful information to delivery workers, several elements of the proposed rules introduce unnecessary complexity and would require substantial system overhauls with little demonstrated benefit. We have two primary concerns that we would like to highlight.

Unnecessary Changes to Distance Disclosures and Distance Preferences

The proposed rules would require delivery platforms to adopt new distance-related disclosures and to rebuild existing tools that workers already use to understand and manage trip length. These changes represent a significant departure from long-established industry practices and would force platforms to redesign core features that currently function effectively. We urge DCWP to avoid mandating changes that would substantially alter functioning systems unless there is clear evidence that such changes are necessary and will meaningfully strengthen worker protections. At a minimum, delivery platforms should have flexibility in how they convey information to workers so they can adopt approaches that are workable and avoid confusion.

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Thank you for considering these comments. We look forward to working with DCWP to ensure that any final rules are practical, workable, and supportive of the City's delivery ecosystem including workers, businesses, and the customers they serve.

Sincerely,

Joseph Alston
Senior Director, Government Affairs
The Business Council of NYS

From the Desk of Al Sharpton

December 8, 2025

The Honorable Vilda Vera Mayuga
Commissioner, NYC Department of Consumer and Worker Protection
45 Broadway
New York, NY 10004

Commissioner Mayuga:

We write this letter regarding the Department of Consumer and Worker Protection's (DCWP) recently published proposal to amend Subchapter H of Chapter 7 of Title 6 of the Rules of the City of New York to implement Local Laws 95, 107, 108, 113, 123, and 124 of 2025.

In passing these laws, the City Council has once again demonstrated its unwavering commitment to protecting New York City's grocery delivery worker community, just as it stood up for restaurant delivery workers in 2021. To be clear: the intent of this legislation has, from day one, been to protect grocery delivery workers by ensuring they are paid fairly and commensurately with restaurant delivery workers.

To that end, as the Department is considering comments for its proposed rules process around Local Law 124 specifically, we write this letter to express our support for implementing rules that will not only ensure NYC's grocery delivery workers earn an hourly minimum wage of \$21.44, but that also preserve their flexibility to work when and how they choose.

For context, in a nationwide survey, 77% of app-based earners said they prefer to remain independent contractors because of the freedom and flexibility it provides. The survey also found that the majority make deliveries less than 10 hours per week. Across the five boroughs, many thousands of New Yorkers choose app-based work because they value the flexibility and control, they have of app-based delivery work as they are better able to balance family responsibilities, pursue educational opportunities, or supplement other income.

Specifically, we believe that for grocery delivery workers, it is critical for the City to protect their ability to work just a few hours a day or week.

In service of this goal, we respectfully urge you and the Department to entirely exclude a utilization component from the final rules implemented to calculate grocery delivery worker wages under Local Law 124.

If DCWP is to include a strict utilization standard under these laws – or even an “alternative method,” under which only trip time is compensable,” but at an unfeasibly higher rate -- the City risks creating barriers that hurt grocery delivery workers, limit the number of opportunities

available for flexible work, and ultimately raise delivery costs on the working families, seniors, SNAP beneficiaries and communities of color who rely on affordable food delivery.

Put simply, our fear is that a rigid utilization rate standard could reduce the ability of shoppers to choose when and how they work. It could also limit service to neighborhoods without constant demand, resulting in fewer opportunities for workers and higher delivery costs for customers. Moreover, as the Department has proposed an alternate rate of

In recent years, grocery delivery work has expanded income opportunities for thousands of New Yorkers, grown customer bases for local neighborhood grocers allowing them to compete with big box chains, and strengthened delivery service in neighborhoods that have long been underserved.

These are gains we should be building on, not undermining. Ensuring that flexible work remains viable and that service continues to reach every community is critical to making our city more equitable and resilient.

This approach guarantees fair wages for the work performed while preserving the flexibility workers rely on for childcare, elder care, education, and other commitments. It would obviate the need for rigid scheduling systems that strip workers of their autonomy while safeguarding affordability for consumers.

The stakes of Local Law 124 extend far beyond gig economics. Local grocers, many of them immigrant- and family-owned, depend on delivery platforms to compete with chain supermarkets and national retailers. If costs rise and orders fall, those small businesses will suffer – and the neighborhoods they serve will lose access to affordable, fresh food. Consumers, workers, and retailers are all in this together.

As a coalition of community leaders and the City Council members who voted to pass these laws, we strongly urge you to reconsider the proposed rules and amend them to ensure the City establishes a \$21.44 hourly pay floor for grocery delivery workers based on the time spent actively shopping and delivering.

By amending these proposed rules under Local Law 124 in a way that protects flexibility, affordability, and access, DCWP can give grocery delivery workers a fair wage without punishing the very people they serve.

Sincerely,



Rev. Al Sharpton

December 3, 2025

The Honorable Vilda Vera Mayuga Commissioner,
NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

Dear Commissioner Mayuga,

As a clergy member representing Black and Brown New Yorkers, I write this letter to share my deep concerns regarding Local Law 124 and its impact on our communities. While I recognize the Council's intention to support delivery workers, the Department's proposed rules under this local law, as drafted, would in fact harm the very people it seeks to protect – and impose devastating costs on the families I serve.

For countless New Yorkers, access to affordable grocery delivery is not a convenience but a vital necessity. In my congregation, I see parents trying to make every dollar of SNAP benefits count, seniors who depend on delivery because they cannot make it to their favorite store, and neighbors working their hardest to put food on the table.

Nearly 1.2 million New Yorkers are experiencing food insecurity today. Black and Brown households – disproportionately represented among the city's low-income workers – bear the brunt of these struggles. Policies that make groceries more expensive and harder to access hurt working-class Black and Brown New Yorkers the most.

To that end, I am highly troubled that Local Law 124 could reduce earnings opportunities for tens of thousands of New Yorkers who rely on grocery delivery work to supplement their income. Delivery workers themselves have said that what they value most is the flexibility that grocery delivery offers to pick and choose their hours. Many of these workers – including women balancing childcare, students putting themselves through school, caregivers supporting aging parents – have told the Council throughout the legislative process they do not want restrictions that limit their ability to work when and how they choose. Imposing rigid schedules or restrictive rules would not lift them up, but instead close doors, cut off opportunities, and place even greater strain on families already walking an already hard path. When those families struggle, the burden often falls to our congregation, food pantries, and ministries to fill the gap.

My faith calls me to defend the dignity of work and to protect access to life's essentials. DCWP's proposed rules threaten both. They risk creating a city where grocery delivery is priced beyond the reach of struggling households, where seniors and families in food deserts face new barriers to basic nutrition, and where small grocers – vital anchors of our neighborhoods – are pushed closer to closure.

I urge DCWP to amend these rules in their current form and to work instead toward solutions that guarantee fair pay for delivery workers without a utilization standard while preserving the flexibility and affordability that our communities depend upon. New York must lead with policies that balance worker protections with equity and access for all.

As a faith leader, I see every day the quiet sacrifices my congregants make just to put food on the table. I cannot in good conscience support rules that would make that burden heavier. I call on you to stand with the city's most vulnerable, to protect affordable access to groceries, and to ensure that delivery remains a tool for empowerment, not exclusion.

Respectfully,

Dr. Antoinette Goodrich

The Birthing Place, Brooklyn, NY

dragoodrich@gmail.com

December 3, 2025

The Honorable Vilda Vera Mayuga Commissioner,
NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

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Respectfully,

Rev. Dr. Adolphus Lacey

Bethany Baptist Church Brooklyn Ny

adolphuslacey@me.com

December 5, 2025

The Honorable Vilda Vera Mayuga Commissioner,
NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

Dear Commissioner Mayuga,

As a clergy member representing Black and Brown New Yorkers, I write this letter to share my deep concerns regarding Local Law 124 and its impact on our communities. While I recognize the Council's intention to support delivery workers, the Department's proposed rules under this local law, as drafted, would in fact harm the very people it seeks to protect – and impose devastating costs on the families I serve.

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I urge DCWP to amend these rules in their current form and to work instead toward solutions that guarantee fair pay for delivery workers without a utilization standard while preserving the flexibility and affordability that our communities depend upon. New York must lead with policies that balance worker protections with equity and access for all.

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Respectfully,

Pastor Archie Manning

St. Albans Baptist Church, St. Albans, NY

archiefmanning@gmail.com

December 3, 2025

The Honorable Vilda Vera Mayuga Commissioner,
NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

Dear Commissioner Mayuga,

As a clergy member representing Black and Brown New Yorkers, I write this letter to share my deep concerns regarding Local Law 124 and its impact on our communities. While I recognize the Council's intention to support delivery workers, the Department's proposed rules under this local law, as drafted, would in fact harm the very people it seeks to protect – and impose devastating costs on the families I serve.

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Respectfully,

Pastor Alex Williams

Institutional International Ministries Brooklyn NY

lim.pastoralex@gmail.com

December 4, 2025

The Honorable Vilda Vera Mayuga Commissioner,
NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

Dear Commissioner Mayuga,

As a clergy member representing Black and Brown New Yorkers, I write this letter to share my deep concerns regarding Local Law 124 and its impact on our communities. While I recognize the Council's intention to support delivery workers, the Department's proposed rules under this local law, as drafted, would in fact harm the very people it seeks to protect – and impose devastating costs on the families I serve.

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I urge DCWP to amend these rules in their current form and to work instead toward solutions that guarantee fair pay for delivery workers without a utilization standard while preserving the flexibility and affordability that our communities depend upon. New York must lead with policies that balance worker protections with equity and access for all.

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Respectfully,

Reverend Antonio Jordan

St. Stephens Baptist Church NY, NY

Antjor718@gmail.com

December 3, 2025

The Honorable Vilda Vera Mayuga Commissioner,
NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

Dear Commissioner Mayuga,

As a clergy member representing Black and Brown New Yorkers, I write this letter to share my deep concerns regarding Local Law 124 and its impact on our communities. While I recognize the Council's intention to support delivery workers, the Department's proposed rules under this local law, as drafted, would in fact harm the very people it seeks to protect – and impose devastating costs on the families I serve.

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Nearly 1.2 million New Yorkers are experiencing food insecurity today. Black and Brown households – disproportionately represented among the city's low-income workers – bear the brunt of these struggles. Policies that make groceries more expensive and harder to access hurt working-class Black and Brown New Yorkers the most.

To that end, I am highly troubled that Local Law 124 could reduce earnings opportunities for tens of thousands of New Yorkers who rely on grocery delivery work to supplement their income. Delivery workers themselves have said that what they value most is the flexibility that grocery delivery offers to pick and choose their hours. Many of these workers – including women balancing childcare, students putting themselves through school, caregivers supporting aging parents – have told the Council throughout the legislative process they do not want restrictions that limit their ability to work when and how they choose. Imposing rigid schedules or restrictive rules would not lift them up, but instead close doors, cut off opportunities, and place even greater strain on families already walking an already hard path. When those families struggle, the burden often falls to our congregation, food pantries, and ministries to fill the gap.

My faith calls me to defend the dignity of work and to protect access to life's essentials. DCWP's proposed rules threaten both. They risk creating a city where grocery delivery is priced beyond the reach of struggling households, where seniors and families in food deserts face new barriers to basic nutrition, and where small grocers – vital anchors of our neighborhoods – are pushed closer to closure.

I urge DCWP to amend these rules in their current form and to work instead toward solutions that guarantee fair pay for delivery workers without a utilization standard while preserving the flexibility and affordability that our communities depend upon. New York must lead with policies that balance worker protections with equity and access for all.

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Respectfully,

Reverend Dr. Brian Scott

Union Baptist Church NY, NY

pmiller@ubcofharlem.org

December 3, 2025

The Honorable Vilda Vera Mayuga Commissioner,
NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

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Pastor Bernard Taylor

Open Door COGIC, Brooklyn, NY

elderbernardtaylor@gmail.com

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Reverend Dr. Charles O. Galbreath

Alliance Tabernacle Church Brooklyn, NY

Galbreath.charles@gmail.com

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Respectfully,

Reverend Carlton Mobley

First Baptist Church Flushing, NY

Cemaster2002@yahoo.com

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Respectfully,

Reverend Dr. Carl Washington

New Mount Zion Baptist Church NY, NY

pastorclwashington@gmail.com

December 4, 2025

The Honorable Vilda Vera Mayuga Commissioner,
NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

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Reverend C. Omar Evans

Community Baptist Church Bayside, NY

Coe1906@yahoo.com

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Respectfully,

Bishop Craig Williams

Greater St. Stephens United Church of God Brooklyn, NY

nycswilliams@yahoo.com

December 3, 2025

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NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

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Bishop David Maldanado

Las Marvalas as DelExodo, Brooklyn, NY

revdjm@gmail.com

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Reverend Dorian Malloy

Carolina Baptist Church Bronx, NY

Dorian.malloyjr@gmail.com

December 5, 2025

The Honorable Vilda Vera Mayuga Commissioner,
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Reverend Evan Gray

Macedonia Baptist Church, Arverne, NY

Rev3826@aol.com

December 3, 2025

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Pastor Elijah Boone

Senior Pastor Open Heaven Worship Center

Ninjaboone77@gmail.com

December 3, 2025

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Union Grove Baptist Church Bronx, NY

pastorfcrawford@gmail.com

December 3, 2025

The Honorable Vilda Vera Mayuga Commissioner,
NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

Dear Commissioner Mayuga,

As a clergy member representing Black and Brown New Yorkers, I write this letter to share my deep concerns regarding Local Law 124 and its impact on our communities. While I recognize the Council's intention to support delivery workers, the Department's proposed rules under this local law, as drafted, would in fact harm the very people it seeks to protect – and impose devastating costs on the families I serve.

For countless New Yorkers, access to affordable grocery delivery is not a convenience but a vital necessity. In my congregation, I see parents trying to make every dollar of SNAP benefits count, seniors who depend on delivery because they cannot make it to their favorite store, and neighbors working their hardest to put food on the table.

Nearly 1.2 million New Yorkers are experiencing food insecurity today. Black and Brown households – disproportionately represented among the city's low-income workers – bear the brunt of these struggles. Policies that make groceries more expensive and harder to access hurt working-class Black and Brown New Yorkers the most.

To that end, I am highly troubled that Local Law 124 could reduce earnings opportunities for tens of thousands of New Yorkers who rely on grocery delivery work to supplement their income. Delivery workers themselves have said that what they value most is the flexibility that grocery delivery offers to pick and choose their hours. Many of these workers – including women balancing childcare, students putting themselves through school, caregivers supporting aging parents – have told the Council throughout the legislative process they do not want restrictions that limit their ability to work when and how they choose. Imposing rigid schedules or restrictive rules would not lift them up, but instead close doors, cut off opportunities, and place even greater strain on families already walking an already hard path. When those families struggle, the burden often falls to our congregation, food pantries, and ministries to fill the gap.

My faith calls me to defend the dignity of work and to protect access to life's essentials. DCWP's proposed rules threaten both. They risk creating a city where grocery delivery is priced beyond the reach of struggling households, where seniors and families in food deserts face new barriers to basic nutrition, and where small grocers – vital anchors of our neighborhoods – are pushed closer to closure.

I urge DCWP to amend these rules in their current form and to work instead toward solutions that guarantee fair pay for delivery workers without a utilization standard while preserving the flexibility and affordability that our communities depend upon. New York must lead with policies that balance worker protections with equity and access for all.

As a faith leader, I see every day the quiet sacrifices my congregants make just to put food on the table. I cannot in good conscience support rules that would make that burden heavier. I call on you to stand with the city's most vulnerable, to protect affordable access to groceries, and to ensure that delivery remains a tool for empowerment, not exclusion.

Respectfully,

Rev. Dr. Francko Harris

Mount Olivet Baptist Church Hollis NY

Fharris@mobch.org

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45 Broadway New York, NY 10004

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Pastor Frederick O'Bair

Kingdom Minded Ministries, St. Albans, NY

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Respectfully,

Reverend Dr. Gabby Wilkes

Double Love Experience Brooklyn, NY

Drgabby@gabbycudjoewilkes.com

December 4, 2025

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45 Broadway New York, NY 10004

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Rev. Dr. Hiram Ratliff

New Tabernacle Baptist Church, Bronx, NY

preacherhr@aol.com

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Reverend Jeffery Crenshaw

New Mount Zion Baptist Church NY, NY

revjc@hotmail.com

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Respectfully,

Pastor Jay Gooding Sr.

Miracle Revival Temple COGIC

pastorjaygoodingsr@gmail.com

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Respectfully,

Bishop Jermaine Henderson

The Cathedral of Hope, Brooklyn, NY

Jhenderson0923@me.com

December 5, 2025

The Honorable Vilda Vera Mayuga Commissioner,
NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

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Respectfully,

Pastor Jason Hendrickson

Restoration Tabernacle, Brooklyn, NY

329allthings@gmail.com

December 3, 2025

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Rev. Joseph Jones

Greater Zion Shiloh Baptist Church, Brooklyn, NY

joepreach1@yahoo.com

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Bishop Kimball Brown

The Bridge to Life Church, Brooklyn, NY

kbonie88@gmail.com

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Camaraspeaks@gmail.com

December 3, 2025

The Honorable Vilda Vera Mayuga Commissioner,
NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

Dear Commissioner Mayuga,

As a clergy member representing Black and Brown New Yorkers, I write this letter to share my deep concerns regarding Local Law 124 and its impact on our communities. While I recognize the Council's intention to support delivery workers, the Department's proposed rules under this local law, as drafted, would in fact harm the very people it seeks to protect – and impose devastating costs on the families I serve.

For countless New Yorkers, access to affordable grocery delivery is not a convenience but a vital necessity. In my congregation, I see parents trying to make every dollar of SNAP benefits count, seniors who depend on delivery because they cannot make it to their favorite store, and neighbors working their hardest to put food on the table.

Nearly 1.2 million New Yorkers are experiencing food insecurity today. Black and Brown households – disproportionately represented among the city's low-income workers – bear the brunt of these struggles. Policies that make groceries more expensive and harder to access hurt working-class Black and Brown New Yorkers the most.

To that end, I am highly troubled that Local Law 124 could reduce earnings opportunities for tens of thousands of New Yorkers who rely on grocery delivery work to supplement their income. Delivery workers themselves have said that what they value most is the flexibility that grocery delivery offers to pick and choose their hours. Many of these workers – including women balancing childcare, students putting themselves through school, caregivers supporting aging parents – have told the Council throughout the legislative process they do not want restrictions that limit their ability to work when and how they choose. Imposing rigid schedules or restrictive rules would not lift them up, but instead close doors, cut off opportunities, and place even greater strain on families already walking an already hard path. When those families struggle, the burden often falls to our congregation, food pantries, and ministries to fill the gap.

My faith calls me to defend the dignity of work and to protect access to life's essentials. DCWP's proposed rules threaten both. They risk creating a city where grocery delivery is priced beyond the reach of struggling households, where seniors and families in food deserts face new barriers to basic nutrition, and where small grocers – vital anchors of our neighborhoods – are pushed closer to closure.

I urge DCWP to amend these rules in their current form and to work instead toward solutions that guarantee fair pay for delivery workers without a utilization standard while preserving the flexibility and affordability that our communities depend upon. New York must lead with policies that balance worker protections with equity and access for all.

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Respectfully,

Pastor Kawanna McInnis

Restoration Center of Hope, Brooklyn, NY

kawanamcinnis@gmail.com

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Reverend Dr. Kellie White

United Nations Church Springfield Gardens, NY

kelliewhite@yahoo.com

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Rev. Dr. Kimberly K. Holmes

St. Johns Baptist Church NY, NY

kimberlykholmes@gmail.com

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Rev. Lawrence Aker

Cornerstone Baptist Church Brooklyn Ny

Lawrenceaker3@gmail.com

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Respectfully,

Rev. Lemuel Mobley

Livingstone Baptist Church

mobleysbc@gmail.com

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Respectfully,

Bishop Mitchell Hudson

Friendship Baptist Church, Jamaica, NY

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Bishop Orlando Findlayter

New Hope Christian Fellowship Brooklyn, NY

O4hope@aol.com

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Rev. Dr. Orsella Hughes

St. Luke AME Church, NY, NY

pastororsella@stlukeameharlem.org

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Rev. Patrick Young

Senior Pastor First Baptist Church East Elmhurst

Henry2905@outlook.com

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Bishop Rober Butler

Glory Tabernacle Brooklyn NY

pastorbutler@gmail.com

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Bishop Robert Ewart

Greater Mission Tabernacle, Brooklyn, NY

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NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

Dear Commissioner Mayuga,

As a clergy member representing Black and Brown New Yorkers, I write this letter to share my deep concerns regarding Local Law 124 and its impact on our communities. While I recognize the Council's intention to support delivery workers, the Department's proposed rules under this local law, as drafted, would in fact harm the very people it seeks to protect – and impose devastating costs on the families I serve.

For countless New Yorkers, access to affordable grocery delivery is not a convenience but a vital necessity. In my congregation, I see parents trying to make every dollar of SNAP benefits count, seniors who depend on delivery because they cannot make it to their favorite store, and neighbors working their hardest to put food on the table.

Nearly 1.2 million New Yorkers are experiencing food insecurity today. Black and Brown households – disproportionately represented among the city's low-income workers – bear the brunt of these struggles. Policies that make groceries more expensive and harder to access hurt working-class Black and Brown New Yorkers the most.

To that end, I am highly troubled that Local Law 124 could reduce earnings opportunities for tens of thousands of New Yorkers who rely on grocery delivery work to supplement their income. Delivery workers themselves have said that what they value most is the flexibility that grocery delivery offers to pick and choose their hours. Many of these workers – including women balancing childcare, students putting themselves through school, caregivers supporting aging parents – have told the Council throughout the legislative process they do not want restrictions that limit their ability to work when and how they choose. Imposing rigid schedules or restrictive rules would not lift them up, but instead close doors, cut off opportunities, and place even greater strain on families already walking an already hard path. When those families struggle, the burden often falls to our congregation, food pantries, and ministries to fill the gap.

My faith calls me to defend the dignity of work and to protect access to life's essentials. DCWP's proposed rules threaten both. They risk creating a city where grocery delivery is priced beyond the reach of struggling households, where seniors and families in food deserts face new barriers to basic nutrition, and where small grocers – vital anchors of our neighborhoods – are pushed closer to closure.

I urge DCWP to amend these rules in their current form and to work instead toward solutions that guarantee fair pay for delivery workers without a utilization standard while preserving the flexibility and affordability that our communities depend upon. New York must lead with policies that balance worker protections with equity and access for all.

As a faith leader, I see every day the quiet sacrifices my congregants make just to put food on the table. I cannot in good conscience support rules that would make that burden heavier. I call on you to stand with the city's most vulnerable, to protect affordable access to groceries, and to ensure that delivery remains a tool for empowerment, not exclusion.

Respectfully,

Pastor Sharmaine Byrd

Greater Mt. Carmel Cathedral, Brooklyn, NY

sharmbaby@aol.com

December 3, 2025

The Honorable Vilda Vera Mayuga Commissioner,
NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

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Respectfully,

Pastor Samuel B. West

Mt. Moriah COGIC, Brooklyn, NY

Minwest08@live.com

December 3, 2025

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45 Broadway New York, NY 10004

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Respectfully,

Reverend Dr. Stephen White

United Nations Church Springfield Gardens, NY

kelliewhite@yahoo.com

December 4, 2025

The Honorable Vilda Vera Mayuga Commissioner,
NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

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Respectfully,

Bishop Shelvis Green II

Christway Church, Brooklyn, NY

Shelvisgreen@gmail.com

December 3, 2025

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NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

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Respectfully,

Bishop Shawn R. Mason

Lead Pastor, The Freedom Church Brooklyn NY

Srmason2@gmail.com

December 4, 2025

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NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

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Respectfully,

Rev. Dr. M Travis Boyd

Sharon Baptist Church, Bronx, NY

mtravisboyd@gmail.com

December 4, 2025

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Respectfully,

Bishop Victor Brown

Mt. Sinai United Christian Church Staten Island, NY

Vabrown2@gmail.com

December 5, 2025

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NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

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Reverend Xavier Goodwin

Brownsville Community Baptist Church, Brooklyn, NY

Revxgoodwin@gmail.com

December 5, 2025

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NYC Department of Consumer and Worker Protection
45 Broadway New York, NY 10004

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Respectfully,

Rev. James Duckett

Fort Mott Baptist Church

Pastorjay23@gmail.com

November 25th, 2025
The Honorable Carlos Ortiz
Deputy Commissioner
Department of Consumer and Worker Protection
45 Broadway
New York, NY 10004

Dear Deputy Commissioner Ortiz,

My name is Pastor Jason Hendrickson, and I lead Restoration Tabernacle Church in Bedford-Stuyvesant, Brooklyn. Before I became a pastor, I was an Instacart shopper, so I know firsthand what this work means to thousands of people in our city. At the time, I needed a flexible second job, and becoming an Instacart shopper filled my gap in income while allowing me to pursue other goals. Now, many of my congregants are grocery delivery workers trying to make ends meet while caring for families, working other jobs, or taking classes to build a better future, or my congregants are Instacart customers, who rely on the platform's services. This is about both affordability and work opportunities. That's why I'm writing today to urge you not to include a utilization standard in the implementation of Local Law 124 of 2025 (formerly known as Int 1135-A).

My community fully supports the goal of ensuring fair pay for app-based workers. Every worker deserves dignity and a livable wage. I believe the minimum wage requirement in LL124 of 2025 would adequately address this issue. However, the inclusion of the utilization standard in the rules for implementation would do far more harm than good, especially for lower income residents. The use of a utilization standard would push platforms, like Instacart, into rigid, shift-based systems with increased delivery fees. Meanwhile, Amazon, whose delivery operations would be exempt from this policy, would gain an even greater competitive edge in the market, leaving communities like Bed-Stuy, where independent stores are vital, even further behind. In my own neighborhood, the poverty rate is 25.5%, and many families rely on every dollar to provide for their families and put food on the table. We can't afford policies that make life more expensive. Grocery delivery isn't a luxury for many of us; it's a necessity, especially for seniors, people with disabilities, families who can't always make it to the store, and people living in food deserts.

Nearly 500 grocery stores across the city that partner with Instacart accept SNAP, helping more than 66,000 New Yorkers access fresh food. At a time when SNAP benefits are being cut and grocery prices have risen over 23% (since 2022), adding another \$5 to \$10 in delivery fees for the poorest households is simply unconscionable. Some of our neighbors receive just \$23 a month in SNAP benefits. Therefore, the \$5-10 difference in fees is the difference between eating and going hungry in my community.

Grocery delivery workers are not like restaurant couriers. The data shows that 70% of Instacart shoppers are women, most work just about 4 hours a week, and they earn roughly \$24 an hour. Many use their work with Instacart to supplement other income or navigate other responsibilities. If this policy is implemented with a utilization standard, more than 13,000 shoppers in New York City could lose access to their work opportunity overnight, stripped these workers of the flexible, dignified work that has helped them stay afloat.

As shoppers lose their livelihoods, our small grocers will also suffer. Industry profit margins have fallen to just 1.6%, the lowest since 2019. Online grocery delivery has been one of the few ways

small grocers can stay competitive, but this policy would drive up delivery platform fees (as seen when restaurant delivery fees rose 13% per order) and those costs will again be passed on to consumers, pushing already struggling families and neighborhood grocers closer to the edge. I'm speaking as both a Pastor and a former Instacart Shopper. I know firsthand what this work means for people trying to make ends meet. I've been in the driver's seat (both literally and figuratively) and I've seen how the flexibility of platforms like Instacart gives working people a way to provide for themselves and their families with dignity. Every week, I see those same struggles reflected in my congregation, in the food pantry line, and across Bed-Stuy. I urge you to remove the utilization standard from the rules for implementing Local Law 124 of 2025 and keep grocery delivery accessible for the New Yorkers who depend on it most.

Thank you for your consideration of my perspective.

Sincerely,
Pastor Jason Hendrickson
Restoration Tabernacle Church
1338 Broadway, Brooklyn, NY 11221

From: [Edwin Gomez](#)
To: [rulecomments \(DCWP\)](#)
Subject: [EXTERNAL]
Date: Thursday, December 4, 2025 6:48:39 AM

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Dear Commissioner Mayuga,

My name is Edwin, and I work as a Shipt shopper in New York City. As someone who relies on the flexibility of this job, I am directly impacted by the new grocery delivery laws, Int 1133-2024 and Int 1135-2024.

I am reaching out to advocate for a rulemaking process that respects our need for flexibility and freedom in our work schedules. Flexible work is essential to me because it allows me to claim open metro orders and receive offers tailored to my preferences. If new scheduling requirements limited my choices, it would significantly hinder my ability to work effectively. I prefer to claim open market orders, especially after working a full-time job. A fixed schedule would not only restrict my ability to utilize Shipt but also disrupt the balance I have achieved.

Since transitioning from restaurant to grocery delivery work, I've noticed a significant difference. The increased scheduling in food delivery has decreased my income by over 50%, and I no longer have the freedom to log in as I please.

I strongly urge you to incorporate the insights and experiences of grocery delivery workers like me in upcoming regulations. It's crucial to recognize how we engage with these platforms to ensure any new rules preserve our job's flexibility and independence.

Sincerely,

Edwin Gomez

From: [Alfredo Criollo](#)
To: [rulecomments \(DCWP\)](#)
Subject: [EXTERNAL] My name is Luis, and I work as a shopper with Shipt in New York City. As someone impacted by the new grocery delivery bills, Int 1133-2024 and Int 1135-2024, I am reaching out to advocate for a rulemaking process that safeguards my work styl...
Date: Thursday, December 4, 2025 7:20:47 AM

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Sent from my iPhone

From: [Ahmed Sattar](#)
To: [rulecomments \(DCWP\)](#)
Subject: [EXTERNAL] Rules relating to grocery delivery workers
Date: Thursday, December 4, 2025 6:43:00 AM

You don't often get email from [REDACTED] [Learn why this is important](#)

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Dear Commissioner Mayuga,

My name is Ahmed, and I work as a shopper with Shipt in New York City. In light of the grocery delivery bills, Int 1133-2024 and Int 1135-2024, being passed, I am reaching out to stress the importance of a fair rulemaking process that safeguards my flexible working arrangements.

Being 65 years old, the flexible scheduling offered by Shipt perfectly suits my needs, and I know many other shoppers feel the same way. Any changes to this system, especially without our input, could disrupt the balance that many of us, as grocery shoppers, find invaluable. I usually select my schedule in advance, but I also appreciate the option to log in spontaneously and pick available orders when my schedule allows.

Maintaining the ability to make these choices freely is crucial for me. I strongly urge you to consider the experiences of grocery delivery workers, like myself, to ensure any new regulations are grounded in our reality. This will help us preserve the independence we cherish.

Sincerely,
Ahmed Sattar

From: [huiping zhang](#)
To: [rulecomments \(DCWP\)](#)
Subject: [EXTERNAL] Rules Relating to Grocery Delivery Workers
Date: Thursday, December 4, 2025 7:02:40 AM

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Dear Commissioner Mayuga,

My name is Ellenjing, and I work as a shopper with Shipt in New York City. With the passage of grocery delivery bills, Int 1133-2024 and Int 1135-2024, it's crucial to establish a fair rulemaking process that safeguards our working style and the flexibility we value.

Working with Shipt offers me the chance to provide exceptional service to customers. This flexibility is vital, as it allows me to perform at my best and cater to members' needs effectively. Losing the ability to choose when and how I work could hinder my ability to satisfy customers and impact my overall performance.

I urge you to take into account the insights and experiences of grocery delivery workers like myself. It is essential to fully understand how we navigate these platforms. By doing so, we ensure that new regulations align with the practical aspects of our work. Please contemplate necessary amendments that preserve the flexibility and autonomy I depend on for my livelihood.

Sincerely,
Ellenjing Chen

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From: [Erii Miranda](#)
To: [rulecomments \(DCWP\)](#)
Subject: [EXTERNAL] Value our work
Date: Thursday, December 4, 2025 10:07:08 AM

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Dear Commissioner Mayuga,

My name is Ericka, and I work as a Shipt shopper in New York City. With the grocery delivery bills, Int 1133-2024 and Int 1135-2024, impacting my work, I urge a fair and considerate rulemaking process that preserves our necessary flexibility.

As a single mom, this flexibility is crucial for me. It allows me to work half days and accomplish as many deliveries as possible in that time. Any restrictions on this flexibility could deeply impact my ability to manage both work and personal responsibilities effectively. I prefer receiving orders in advance, as it helps me organize my day around my commitments. This setup allows me to adjust my schedule without penalties, offering the freedom to balance various aspects of my life without being tied down to a fixed routine.

I have found that platforms like these offer a level of flexibility essential for meeting my financial needs. Compared to working long hours with insufficient pay, this opportunity allows me to manage my time better and ensure I can cover my expenses in an increasingly costly environment. This adaptability is why I chose this path over more traditional job structures.

I urge you to consider the views of delivery workers like myself, ensuring new rules align with our experiences and allow us to continue thriving in this flexible work model. Protecting our autonomy is vital for our success and sustainability in this role.

Sincerely,
Ericka Miranda

From: [Omayra Edghill](#)
To: [rulecomments \(DCWP\)](#)
Subject: [EXTERNAL] Rules Relating to Grocery Delivery Workers
Date: Thursday, December 4, 2025 7:21:54 AM

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Dear Commissioner Mayuga,

My name is Omayra, and I work as a Shipt shopper in New York City.

With the recent introduction of bills Int 1133-2024 and Int 1135-2024, I am reaching out to emphasize the need for a fair and transparent rulemaking process that preserves our work flexibility. Flexibility in my work is vital, as I should not be limited regarding when I work, the number of orders I choose, and my availability for delivering as requested. This adaptability is crucial for maintaining the balance between work and personal responsibilities.

Shipt's flexibility allows me to set my availability without restrictions, enabling me to manage my schedule alongside my family commitments. This freedom to decide my schedule is not something that should fall under external control, particularly amidst challenging economic conditions for individuals striving to remain financially secure.

One key aspect that drives my commitment to Shipt is the ability to support those who lack the means to procure essential groceries and necessities on their own, like families with small children or elderly residents. Providing such assistance is deeply fulfilling and essential, allowing me to make a significant difference in people's lives.

I urge you to incorporate these insights from grocery delivery workers into the upcoming regulations. It's crucial that any enforced rules reflect the practical realities of our work and safeguard the flexibility and independence that allow us to thrive.

Sincerely,
Omayra Edghill

From: [Edgar Marquina](#)
To: [rulecomments \(DCWP\)](#)
Subject: [EXTERNAL] Normas relativas al trabajo de repartidores de comestibles
Date: Thursday, December 4, 2025 6:45:18 AM

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Estimado Comisionado Mayuga,

Me llamo Edgar y soy comprador de Shipt en la ciudad de Nueva York. Como uno de los afectados directamente por las nuevas leyes de entrega de comestibles, Int 1133-2024 e Int 1135-2024, me dirijo a ustedes para abogar por un proceso normativo que preserve la flexibilidad esencial para mi forma de trabajar.

La flexibilidad de mi trabajo es fundamental para mí. Cualquier nuevo horario que limite mi capacidad para elegir cuándo y cómo trabajar podría afectar significativamente mi sustento y bienestar. Disfruto trabajando con Shipt precisamente porque me brinda tanta flexibilidad. La comodidad de elegir horarios de entrega que se ajusten a mi horario es invaluable, y la proximidad de la tienda a mi casa fomenta un vínculo comunitario. Los clientes me reconocen y prefieren mi toque personal, valorando la familiaridad que les brindo al comprar.

Mi experiencia abarca tanto la restauración como el reparto de comestibles. En restaurantes, me enfrenté al reto de contar con personal estresado y un ambiente laboral a veces hostil. Por otro lado, el reparto de comestibles ofrece un ambiente más agradable, lo que beneficia tanto a los clientes como a los trabajadores.

Les insto a que consideren profundamente las experiencias de trabajadores como yo al definir las normas. Es necesario comprender nuestras interacciones con estas plataformas para garantizar que cualquier nueva normativa refleje fielmente la dinámica real de nuestro trabajo. Es fundamental proteger la flexibilidad e independencia que me permiten mantener mis ingresos y un equilibrio entre mi vida laboral y personal.

Atentamente,
Edgar Marquina

From: [Pedro Pilato](#)
To: [rulecomments \(DCWP\)](#)
Subject: [EXTERNAL] Rules Relating to Grocery Delivery Workers
Date: Friday, December 5, 2025 1:06:31 PM

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Dear Commissioner Mayuga,

My name is Pierre, and I work as a shopper with Shipt in New York City. With the recent passage of grocery delivery bills Int 1133-2024 and Int 1135-2024, I am reaching out to advocate for a fair rulemaking process that aligns with the needs of workers like myself, emphasizing our preference for flexible working conditions.

Flexibility is crucial for me as it allows me to manage my life with young children effectively. The ability to adjust my work schedule is essential, and any new scheduling constraints could significantly impact my ability to balance these responsibilities.

In my role with Shipt, I choose to be on schedule and appreciate the advance notices for orders. This gives me the time needed to ensure that I shop accurately, acknowledging that sometimes substitutions are necessary, but not always welcomed by customers.

Additionally, I have found more satisfaction in grocery delivery compared to restaurant food delivery. Being able to help communities and assist those in need is something I value deeply. This sense of community contribution sets grocery delivery apart for me.

I strongly urge that the views of grocery delivery workers be considered so that new rules reflect our daily realities. Ensuring that the proposed regulations protect the flexibility we depend on is vital for both our livelihood and service quality.

Sincerely,
Pierre DiPilato

From: [Nina Mast](#)
To: [rulecomments \(DCWP\)](#)
Subject: [EXTERNAL] EPI comment in support of NYC DCWP proposed rule to establish minimum pay protections for grocery delivery workers
Date: Friday, December 5, 2025 4:01:23 PM

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December 5, 2025

Department of Consumer and Worker Protection
42 Broadway
New York, New York 10004

Dear members of the New York City Department of Consumer and Worker Protection:

The Economic Policy Institute (EPI) submits this [comment](#) in **support** of the New York City Department of Consumer and Worker Protection (DCWP) proposal to amend rules relating to contracted delivery workers, including to implement Local Law 124 of 2025, which establishes minimum pay protections for grocery delivery workers.

EPI is a nonprofit, nonpartisan think tank working for nearly 40 years to counter rising inequality, low wages and weak benefits for working people, slower economic growth, unacceptable employment conditions, and a widening racial wage gap. We intentionally center low- and middle-income working families in economic policy discussions at the federal, state, and local levels as we fight for a world where every worker has access to a good job with fair pay, affordable health care, retirement security, and a union. EPI has supported past development and implementation of New York City's existing wage standard for app-based workers in close coordination with affiliates of our Economic Analysis and Research Network (EARN), including the NYC-based Immigration Research Initiative.

New York City has long been a national leader in setting wage and workplace protection standards for frontline service-sector workers who are critical to the city's economy but often experience [low pay](#), [long hours](#), and [unsafe working conditions](#) while producing large profits for corporations or shareholders. This includes workplace protections for app-based ride-hail drivers in place since 2018, and for food delivery workers in place since 2021, when the Council acted on findings from DCWP and established wage standards for app-based delivery workers who are typically treated as "independent contractors" by platform companies and, thereby, denied coverage under most state or federal labor and employment laws. Such municipal policies have become critical to maintaining a consistent wage floor for essential workers in the expanding "gig economy," since classifying app-based workers as

“independent contractors” or applying other non-employee designations remains a [key prong](#) of platform companies’ agenda to exempt themselves from coverage under other existing state and federal labor standards.

The 2021 minimum pay standard represented huge progress for app-based delivery workers, the majority of whom are immigrants and people of color. A [2024 report](#) by DCWP revealed a 64% increase in driver earnings alongside an 8% increase in deliveries and a 10% increase in consumer spending when compared with the same fiscal quarter a year prior, before DCWP’s enforcement of the new wage standard. In the [first quarter of 2025](#), consumer spending on app-based delivery grew to an all-time high of \$120.2 million, and workers’ total earnings per delivery increased by 21%. In direct contrast to industry claims, these basic workplace protections have benefitted both app-based workers and the platform companies that rely on them.

New York City laws have, however, so far excluded app-based grocery delivery workers, even though these workers face the same struggles that other app-based workers face. Now is the time to take the next step to ensure that all app-based workers are covered by minimum pay and other workplace protections, regardless of their employer.

App-based workers deserve the same protections and benefits as workers in any other industry, including minimum wage rights, unemployment insurance, workers’ compensation, health and safety protections, paid leave, nondiscrimination protections, safeguards against misclassification as independent contractors, and the right to unionize and collectively bargain. DCWP’s proposed rule takes an important step toward realizing that goal by limiting the scope of app-based workers who are excluded from existing minimum wage standards. Raising the minimum wage for app-based grocery delivery workers will have spillover effects that benefit workers in other low-wage jobs, and higher minimum wages [benefit us all](#) and make our economy healthier.

Sincerely,

Nina Mast (she/her or they/them)
Policy and Economic Analyst
Economic Analysis and Research Network (EARN)
Economic Policy Institute
1225 Eye Street, Suite 600 Washington, DC 20005
[EARN.us](#) | [@EARNetwork](#) | [EPI.org](#) | [@EconomicPolicy](#)

From: [Dark Lloyd](#)
To: [rulecomments \(DCWP\)](#)
Subject: [EXTERNAL] Keeping flexibility for us shoppers
Date: Monday, December 8, 2025 12:48:32 AM

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Dear Commissioner Mayuga,

My name is Anthony, and I earn money as a shopper with Shipt in New York City. As someone directly affected by the recently passed grocery delivery bills, Int 1133-2024 and Int 1135-2024, I am writing to request a fair and transparent rulemaking process that protects my way of working and my desire to maintain flexibility in how I work.

Flexibility is very important because it gives me the opportunity to study for my classes and later on the option to work I schedule myself in advance so that way I know what time works best for me while also see and choose what offers are best and available for with out having to worry about penalties when declining. When I was delivering for Uber Eats this law has impacted majority of us due to the restrictions and scheduling restrictions where your only able to reserve up to 5 hours and I was unable to set a schedule because of the limited availability. This would single handily impact grocery workers due on how they choose and set their schedules and also would also mean they would have to rush the order due to them not being able to lose their spot taken when scheduling.

I urge you to consider the perspectives of grocery delivery workers like me to gain a deeper understanding of how we interact with these platforms and ensure that any new regulations are enforced in a manner that reflects the realities of our work.

Before moving forward, please consider the necessary amendments that protect the flexibility and independence that I rely on to earn.

Sincerely,
Anthony Socop

From: [Jeff Elmer](#)
To: [rulecomments \(DCWP\)](#)
Subject: [EXTERNAL] Comments on Rules for Contracted Delivery Workers
Date: Monday, December 8, 2025 10:58:30 AM

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Comments on Rules for Contracted Delivery Workers

Good morning, My name is Jeff Elmer and I am a NYC resident. I'm writing in support of the DCWP proposal to amend and carry out rules implementing Local Law 123 and 124 of 2025 as well as other 2025 rulemaking.

I'm retired now but for about 12 years, I ran the Bureau of Labor Law under two NY City Comptrollers and later helped manage the team that monitored compliance with wage standards at the NYC School Construction Authority. In both jobs, we came up against bad contractors who ripped off workers and deprived them of their rightful legal prevailing wages.

But I rarely saw the levels of exploitation that exist in the world of app-based delivery services, backed by huge corporations. I have spoken with delivery workers and their advocates and reviewed the often-minimal payments these couriers receive for their hard-earned labor. It is an unfair business model built on the backs of tens of thousands of exploited gig workers in NYC alone.

The rules implementing this legislation will provide enforceable labor standards across nearly the entire e-commerce industry for the first time. I support the expansion of the minimum pay standard to include more app-based delivery workers such as Instacart couriers and Amazon Flex delivery drivers. They perform very similar work as the delivery couriers working for Doordash and Uber Eats who already are covered by DWCP minimum pay and workplace protection laws. They too deserve fair pay for all the time they work—including making deliveries and waiting on the app—and clear, transparent compensation. Now is the time to make sure that regardless of who is the employer, ALL app-based gig workers are safeguarded against exploitation and afforded fair and understandable compensation standards.

I trust that when the DCWP begins the process of setting minimum wage rates, it will consult with workers and their representatives from unions and worker centers in these industries to understand current pay practices and not just rely on data they receive from the multi-billion-dollar app-based platform companies who have an interest in minimizing their labor costs.

I also strongly support the rules that DCWP wants to implement establishing that delivery workers have the right to receive written pay statements from the companies

that retain them. From my prior experience in Labor Standards Compliance, these pay statements are often critical when an agency needs to build a case against a company that may be cheating its workers, whether defined as employees or independent contractors.

Finally, it is critical that the DCWP have the records needed to enforce the new requirement that third-party food delivery services must provide customers with an opportunity for tipping these workers. As a frequent Doordash customer, it has been frustrating in the past to have to click through the interface numerous times to be able to provide a tip. Clearly, the algorithm should be set up to make tipping an appropriate amount easy; the “boilerplate” should be at least 15% or 20% like in NYC taxis with lower and higher options available.

Thank you for the opportunity to provide these comments.

From: [DJ FRESH](#)
To: [rulecomments \(DCWP\)](#)
Subject: [EXTERNAL] Public Comment on Proposed Grocery Delivery Rules
Date: Tuesday, December 9, 2025 2:21:56 PM

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To the NYC Department of Consumer and Worker Protection,

My name is Christopher Elias, and I am a Shipt grocery shopper in New York City. I'm submitting this comment to explain why grocery delivery work is different from restaurant/food delivery and why it's important that the final rules recognize this difference.

Grocery delivery requires more time, effort, and responsibility than standard food delivery. I spend time inside the stores shopping for multiple items, dealing with substitutions, long checkout lines, and customer communication. Every order is unique and often involves heavy lifting, handling fragile items, and following detailed instructions. This is very different from restaurant delivery, where the worker usually just picks up a prepared order and drops it off.

Because grocery orders take significantly more labor and time, the rules should reflect that difference. If the rules treat grocery delivery and restaurant delivery the same, it could negatively impact my ability to earn fairly for the work I do.

Flexibility is also a major reason I choose grocery delivery work. It allows me to manage my schedule, support myself, and balance my responsibilities outside of work. I hope the final rules continue to support this flexibility while still protecting workers.

Thank you for taking the time to consider my experience and the realities

of grocery delivery.

Sincerely,

Christopher Elias

Arijan Dautaj NEW YORK NY 100

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DCWP
42 BROADWAY #5
NEW YORK, NY 10004

10004-390205

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Dear Commissioner Mayuga,

As a grocery delivery worker in New York City, I'm proud to serve my community by delivering groceries and essential goods.

As the Department of Consumer and Worker Protection (DCWP) drafts rules under Local Law 124, I'm deeply concerned that applying a restaurant delivery pay model to grocery delivery could harm us. I urge DCWP to:

1. Protect flexibility by basing pay on a system that avoids rigid shifts.
2. Implement a wage standard based on active trip time to avoid hurting workers' ability to access earning opportunities.
3. Monitor and adjust the rule if it reduces opportunities, tips, or affordability.

Thank you for your time and consideration.

Sincerely,

Arijan Dautaj
Name

Staten Island

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NY 100

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DCWP
42 BROADWAY #5
NEW YORK, NY 10004

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Dear Commissioner Mayuga,

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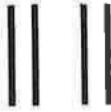
Thank you for your time and consideration.

Sincerely,

Andre Calcador Broad

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DCWP
42 BROADWAY #5
NEW YORK, NY 10004

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Thank you for your time and consideration.

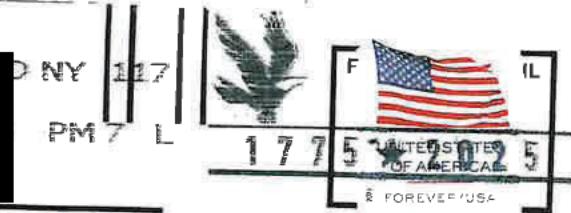
Sincerely,

Name

Bronx

Borough

Claudia Argueta



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DCWP
42 BROADWAY #5
NEW YORK, NY 10004

004-390205

Dear Commissioner Mayuga,

As a grocery delivery worker in New York City, I'm proud to serve my community by delivering groceries and essential goods.

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3. Monitor and adjust the rule if it reduces opportunities, tips, or affordability.

Thank you for your time and consideration.

Sincerely,

Claudia Argueta

Name

Queens
Borough

Anthony Graciani

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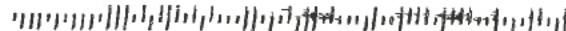
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DCWP
42 BROADWAY #5
NEW YORK, NY 10004

0004-390205



Dear Commissioner Mayuga,

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Thank you for your time and consideration.

Sincerely,

Anthony Graciani
Name

Bronx
Borough

NEW YORK NY 100

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DCWP
42 BROADWAY #5
NEW YORK, NY 10004

1004-390205

Dear Commissioner Mayuga,

As a grocery delivery worker in New York City, I'm proud to serve my community by delivering groceries and essential goods.

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3. Monitor and adjust the rule if it reduces opportunities, tips, or affordability.

Thank you for your time and consideration.

Sincerely,

Deyarie Edwards
Name

Brooklyn
Borough

Frank Richard

Frank K. Kirman NEW YORK NY 100

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DCWP
42 BROADWAY #5
NEW YORK, NY 10004

004-390205

Dear Commissioner Mayuga,

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3. Monitor and adjust the rule if it reduces opportunities, tips, or affordability.

Thank you for your time and consideration.

Sincerely,

Richard Frank

Name _____

Haten Island Borough

rect Commission, manyuga,

As a grocery delivery worker in New York City, I'm proud to serve my community by delivering groceries and essential goods.

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Sincerely,

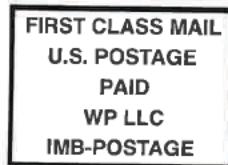
Eva Ramirez

Name _____

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Borough D454



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42 BROADWAY #5
NEW YORK NY 10004

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DCWP
42 BROADWAY #5
NEW YORK, NY 10004

004-390205

Dear Commissioner Mayuga,

Carry

As a grocery delivery worker in New York City, I'm proud to serve my community by delivering groceries and essential goods.

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Thank you for your time and consideration.

Sincerely,

ROY RICHARDSON

Name _____

BRONX

Borough

Nancy Adams

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DCWP
42 BROADWAY #5
NEW YORK, NY 10004

004-390205

Dear Commissioner Mayuga,

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3. Monitor and adjust the rule if it reduces opportunities, tips, or affordability.

Thank you for your time and consideration.

Sincerely,

Nancy Adams

Name _____

Bronx
Borough

Sam SLOMOVICS

NY NY 117
025PM 6 L

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DCWP
42 BROADWAY #5
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Dear Commissioner Mayuga,

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3. Monitor and adjust the rule if it reduces opportunities, tips, or affordability.

Thank you for your time and consideration.

Sincerely,

Sam SLOMOVICS
Name

BROOKLYN
Borough



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BRITTAIN GILLILAND
OR CURRENT RESIDENT
[REDACTED]



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GROCERYAFFORDABILITY.NYC

NYC IS PUTTING GROCERY DELIVERY WORK AT RISK

BUT SHOPPERS LIKE YOU CAN SAVE IT IF YOU SPEAK OUT

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**NEW YORKERS
FOR AFFORDABLE
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Name

Borough

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WE NEED TO TELL CITY HALL TO PRESERVE WORKER FLEXIBILITY AND EARNINGS OPPORTUNITIES.



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Thank you for your time and consideration.

Sincerely,

Omar Ibrahim
Name

Staten Island
Borough



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DCWP
42 BROADWAY #5
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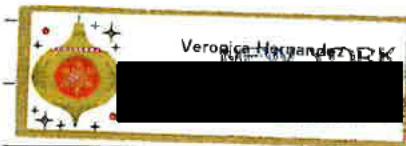
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Thank you for your time and consideration.

Sincerely,

Veronica Hdz
Name

Bronx
Borough



NY 100
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DCWP
42 BROADWAY #5
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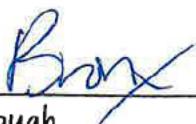
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Name


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JASON WATSON
OR CURRENT RESIDENT
[REDACTED]

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GROCERYAFFORDABILITY.NYC

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ANGGIE AGUIRRE PAUTA
OR CURRENT RESIDENT

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NEED TO TELL CITY HALL TO PRESERVE WORKER FLEXIBILITY AND EARNINGS OPPORTUNITIES.

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OR CURRENT RESIDENT



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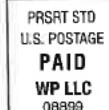
DCWP
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NEW YORK, NY 10004





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MEHEDI AHASAN
OR CURRENT RESIDENT
[REDACTED]



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GROCERYAFFORDABILITY.NYC

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TIARA LAFONTANT
OR CURRENT RESIDENT

SP JH



GROCERYAFFORDABILITY.NYC

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**NEW YORKERS
FOR AFFORDABLE
GROCERIES**

Name _____

Borough _____

Mr. Ibrahim

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Sincerely,

Mohamed Ibrahim
Name

Staten Island
Borough

Saulteyna ~~bis~~ NEW YORK NY 100

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42 BROADWAY #5
NEW YORK, NY 10004

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Sincerely,

Soukeyna Diop

Name

Brax

Borough

Melissa Henry

NY 117

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Sincerely,

Melissa Henry

Name

Brooklyn

Borough

NEW YORK NY 100

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Sincerely,

Hong Lin
Name

Richmond/Staten
Borough ISLAND

MONICA C SMITH

NY 100

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DCWP
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MONICA C SMITH

Name

Bronx

Borough



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Sincerely,

ISRAEL GOLDWATER QUEENS
Name Borough

MID-ISLAND NY 117

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Sincerely,

Sincerely,
Denee Jacobs
Name

Name _____

Brooklyn
Borough

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FALILOU DIOUF

Name

Bronx

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Veronica McRae

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As the Department of Consumer and Worker Protection (DCWP) drafts rules under Local Law 124, I'm deeply concerned that applying a restaurant delivery pay model to grocery delivery could harm us. I urge DCWP to:

1. Protect flexibility by basing pay on a system that avoids rigid shifts.
2. Implement a wage standard based on active trip time to avoid hurting workers' ability to access earning opportunities.
3. Monitor and adjust the rule if it reduces opportunities, tips, or affordability.

Thank you for your time and consideration.

Sincerely,

Veronica McRae
Name

BRONX
Borough

NEW YORK NY 100
16 DEC 2025 PM 14:11

FIRST CLASS MAIL
U.S. POSTAGE
PAID
WP LLC
IMB-POSTAGE

NO POSTAGE NECESSARY.
POSTAGE HAS BEEN PAID.

|||||

DCWP
42 BROADWAY #5
NEW YORK, NY 10004

004-390205

|||||

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Thank you for your time and consideration.

Sincerely,

Veronica Medina
Name

Bronx
Borough

Online comments: 149

- **mike desabato**

The flexibility I get with instacart is the reason I am with instacart for over 6 years and have done over 8,000 deliveries.

I work when I want

I don't have to work when I don't feel safe

I don't have to work when my family needs me

Any changes to the current status quo would not be good.

I'm very proud to say I'm a solid family member, friend and a member of my local community; during COVID I was proud to help by delivering groceries on my terms.

Comment added November 11, 2025 6:01pm

- **Anonymous**

Hello I'm an Instacart shopper who has been working on the app for five years now. I started working on the app to earn extra income and it has really been a lifesaver for me and a major part of that was being able to have the flexibility to make my own schedule. I have worked other apps that have gotten rid off that option because of the laws that passed. And I can tell you it had a major effect on my income and my ability to earn extra money for bills. All the apps are not the same and I personally think it's very important for instacart to have the ability to let the shoppers create there own schedule instead of being forced into trying to fight over availability. Instacart is dealing with groceries and forcing them to change their scheduling would create a disruption for Instacart, shoppers, and customers. This will also cause us shoppers to earn less money and will force people to use instacart less. I urge the New York City Department of Consumer and Worker Protection (DCWP) to adopt rules that protect the flexible work opportunities for us shoppers. Thank you

Comment added November 12, 2025 3:17pm

- **Eli AP**

My name is Eli, I work in Lower Manhattan, I've been shopping with Instacart since 2023.

After the restaurant delivery law passed, I was unable to continue doing deliveries because as a part-time delivery guy the people who did it full-time were given priority access to scheduling hours. A neighbour told me about Instacart so I signed up. Then I find that with Instacart I still had my flexibility, to sign in and out as I needed. I also enjoyed doing Instacart better. I get to shop for senior citizens who cannot go shopping for themselves. Those are always my favourite deliveries.

As a single parent, and now, a full-time college student my flexibility is even more important. I need to be able to work when I can without the need to schedule myself. I fear that this law will push me out of the app the way it did with all the food delivery apps I used to deliver for.

Please do not allow what has already happened on other platforms to happen on Instacart.

Comment added November 13, 2025 9:59am

- **jenifer masras**

I support it

Comment added November 14, 2025 8:06am

- **San Francisco Labor Council**

The San Francisco Labor Council, representing over 80,000 union members in San Francisco, supports extending New York City's delivery worker minimum pay standard to include app-based grocery delivery workers. Across the country, app-based platforms have built multi-billion-dollar businesses on the labor of workers who too often

earn far below a livable wage. There is no economic or moral justification for carving grocery delivery workers out of basic wage protections. Ensuring that grocery delivery workers are covered by the minimum pay rule is necessary to prevent the creation of a second-tier workforce and will help stabilize an industry that has relied for far too long on poverty wages and unpredictable compensation. Workers who deliver groceries face the same risks, costs, and demands as other app-based delivery workers—long hours, heavy loads, unsafe streets, and the burden of covering their own equipment and expenses. They deserve the same protections. The San Francisco Labor Council stands in solidarity with New York City's delivery and grocery workers and urges swift approval of this rule.

Comment added November 20, 2025 1:47pm

- **Saiph Savage**

To the Department of Consumer and Worker Protection:

Thank you for the opportunity to comment on the proposed rules implementing Local Laws 95, 107, 108, 113, 123, and 124 of 2025. I strongly support these protections for contracted delivery workers.

My research lab at Northeastern University has developed tools to measure the real hourly wages of gig workers by accounting for all the unpaid work they must do to access paid jobs. In a large field study, we found that gig workers spend 33% of their daily time on unpaid "invisible labor." This includes searching for jobs, managing payments, dealing with timeouts, and navigating platform systems. When we included this unpaid labor, workers' median hourly wage fell from \$3.76 to \$2.83.

These findings show that gig platforms currently shift significant business costs onto workers, forcing them to perform unpaid tasks just to access the paid work they were hired for. Much of this unpaid work—like payment checking, problem-solving around missing

wages, and constantly waiting for restaurants to finish an order, should be absorbed by the platforms, not by the workers themselves.

Through our research, we have also seen that platforms do have the technological capacity and financial resources to reduce this unpaid labor and pay workers fairly. The unpaid labor we document is not inevitable; it is the result of design choices that can be changed. With clear regulation, platforms could ensure minimum pay, reduce unnecessary unpaid tasks, and protect workers from the constant financial uncertainty created by platform policies.

I hope that these new rules help shift the responsibility back onto the platforms, ensure that workers are paid for all the labor they perform, and prevent companies from forcing workers to do unpaid tasks that lower their effective wages.

Thank you for your attention to this issue and for taking steps to protect delivery workers.

[Comment attachment](#)

2110.00169v1.pdf

Comment added November 25, 2025 9:36am

Quantifying the Invisible Labor in Crowd Work

CARLOS TOXTLI, Northeastern University, United States

SIDDHARTH SURI, Microsoft Research, United States

SAIPH SAVAGE, Northeastern University & Universidad Nacional Autonoma de Mexico (UNAM)

Crowdsourcing markets provide workers with a centralized place to find paid work. What may not be obvious at first glance is that, in addition to the work they do for pay, crowd workers also have to shoulder a variety of unpaid invisible labor in these markets, which ultimately reduces workers' hourly wages. Invisible labor includes finding good tasks, messaging requesters, or managing payments. However, we currently know little about how much time crowd workers actually spend on invisible labor or how much it costs them economically. To ensure a fair and equitable future for crowd work, we need to be certain that workers are being paid fairly for *all* of the work they do. In this paper, we conduct a field study to quantify the invisible labor in crowd work. We build a plugin to record the amount of time that 100 workers on Amazon Mechanical Turk dedicate to invisible labor while completing 40,903 tasks. If we ignore the time workers spent on invisible labor, workers' median hourly wage was \$3.76. But, we estimated that crowd workers in our study spent 33% of their time daily on invisible labor, dropping their median hourly wage to \$2.83. We found that the invisible labor differentially impacts workers depending on their skill level and workers' demographics. The invisible labor category that took the most time and that was also the most common revolved around workers having to manage their payments. The second most time-consuming invisible labor category involved hyper-vigilance, where workers vigilantly watched over requesters' profiles for newly posted work or vigilantly searched for labor. We hope that through our paper, the invisible labor in crowdsourcing becomes more visible, and our results help to reveal the larger implications of the continuing invisibility of labor in crowdsourcing.

1 INTRODUCTION

Crowdsourcing markets, and their APIs, can help absorb some of the costs associated with crowd work [51, 82]. From the requesters' perspective, these platforms provide an always-available pool of workers and an easy-to-use payment API to contract workers and start getting work done [5, 63, 75]. From the workers' perspective, these markets provide a central place to find work and offer them the flexibility of working from wherever they desire [1, 87].

However, recent research has identified that some of these costs do not actually get absorbed by the crowdsourcing platform, but rather, they are passed onto the workers in the form of invisible labor [15, 51]. Invisible labor is defined as "*unpaid activities that occur within the context of paid employment that workers perform in response to requirements (either implicit or explicit) from employers and that are crucial for workers to generate income, to obtain or retain their jobs, and to further their careers, yet are often overlooked, ignored, and/or devalued by employers, consumers, workers, and ultimately the legal system itself* [15]."

Invisible labor is also present in crowd work and it includes activities such as: the unpaid time workers have to invest in finding work, figuring out on their own how to complete the job at hand, or managing their payments [51, 67]. The problem is that crowd workers are forced to engage in these unpaid activities just to be able to complete the labor for which they are paid [91, 107]. If we are aiming to create a future where crowd work is fair and equitable to workers, we need to ensure that workers receive a fair wage for *all* of the labor they do, whether it is the actual tasks for which they get paid, or the unpaid invisible work they do above and beyond that work.

The central question this work addresses is how much time do workers actually spend on invisible work, and how does this affect their overall hourly wages? This is an important question not only

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to ensure that workers receive a fair wage now but also to ensure that workers receive a fair wage in the future. Notice that our research is addressing a critical problem because a common use case for crowd work is to train machine learning algorithms, or to provide a human-in-the-loop approach when A.I. fails [13, 44, 100, 106]. Since we are in the midst of an “A.I. revolution,” it is plausible that we will see dramatic growth in the use of crowd labor [10, 45, 64, 65, 99]. In addition, post-COVID-19, there will likely be a large increase in people who need to work from home, whether that is for safety reasons or because of the massive number of worldwide layoffs [29, 31, 104]. Measuring invisible labor in crowd work will only grow in importance going forward.

To start to quantify the invisible labor in crowd work, we develop a web plugin¹ that allows us to detect when a worker is performing invisible labor and quantitatively measure the amount of time the worker spends on such efforts on Amazon Mechanical Turk (MTurk), one of the most popular crowdsourcing markets [73]. We conduct a field study with our plugin to measure in the wild the amount of time crowd workers invest in invisible labor, and contrast with the amount of time workers spent on paid labor. Armed with our plugin, we had 100 crowd workers use our plugin for one week. Workers completed 40,903 human intelligence tasks (HITs). Through our plugin, we uncovered that crowd workers spent 33% of their time on MTurk doing unpaid work. Relatively similar to prior work, we found that workers’ median hourly wage considering only paid labor was \$3.76 [57]. But, if we consider the time workers spent on invisible labor, we calculated that workers’ median hourly wage dropped to \$2.83. We also found that the amount of time that workers dedicated to invisible labor varied across workers’ skill level and demographics. We found that master workers spent 23% less time on invisible work than regular workers. We also observed that the time spent in invisible work appears to be heavily correlated with demographic factors.

The invisible labor in which crowd workers spent the greatest portion of their time revolved around payments. In particular, this most time consuming activity involved doing tasks for which workers were not paid because they experienced a “time out” (and hence they did not receive any payment for any of the labor they conducted for the task). Workers spent a median of 4.5 minutes daily on this activity. Overall, invisible labor around “payments” was the most time-consuming for workers; it was also among the most common. In fact, 97% of the workers in our study practiced invisible labor around visiting the earnings section on their workers’ dashboard (perhaps to ensure they had gotten paid fairly [112]). The second most time-consuming category of invisible labor involved hyper-vigilance where workers were “on-call” vigilantly watching over requesters’ profiles ready to do, at all hours of the day, the labor that certain requesters posted, as well as vigilantly searching for work on Amazon Mechanical Turk [24, 51, 114]. Understanding invisible labor is key to creating positive change in crowd work [15]; however, it has remained so far understudied. Bettering our understanding of invisible labor will allow us to design fairer crowdsourcing markets.

2 RELATED WORK

Our research builds on two main pieces of literature: (1) research on invisible labor, especially within digital labor markets [15]; and (2) methodologies to quantitatively measure the time crowd workers spend completing paid labor on MTurk [96, 98], i.e., HITs.

2.1 Invisible Work

The literature has traditionally characterized invisible labor as work that is “economically devalued through cultural, legal, and/or spatial dynamics” [59]. Under this definition, invisible labor is usually done in private rather than public [18, 50]. Usually, housework is one of the most commonly cited

¹<https://github.com/anonym-research/invisible-labor>

examples of invisible labor [14, 30], and it involves both psychical labor and mental labor (e.g., planning what types of household chores should be done and in what manner.)

In their book Invisible Labor [15], Crain et al. describe the concept of invisible work as the “*activities that occur within the context of paid employment that workers perform in response to requirements (either implicit or explicit) from employers.*” They explain how this concept has existed in different offline settings before, but nowadays, technology has enabled a large part of all invisible labor. In particular, a number of technology companies are passing several aspects of digitization labor to consumers and workers, e.g., consumers are expected to install all the required Internet infrastructure at their homes. This labor is typically presented as something that is mundane, flexible, and part of the “do-it-yourself” culture [48]. However, this dynamic also reduces the meaning of this type of labor, making it invisible, and something for which people are not paid.

2.2 Invisible Labor in Crowd Work

Gray and Suri [51] explored these concepts of invisible labor with a particular angle toward crowd workers. Through in-depth interviews with crowd workers, their book “Ghost Work” unveils the current conditions to which crowd workers are exposed and explains how companies have placed on the shoulders of workers a great portion of the invisible labor that companies themselves would traditionally do. The book also went a step further and started to describe the different types of invisible labor present in crowd work. Within this setting of describing invisible labor in crowd work, it is important to consider that crowd work does not emerge only from the requesters’ side of the market; it is also something that crowdsourcing platforms, such as Amazon Mechanical Turk facilitate [51] and could, with different design choices, help alleviate. For instance, crowdsourcing platforms could help match workers to tasks to reduce search time. Also, they could potentially pay workers for the time they spend searching for tasks or reading messages from requesters, which is something that companies have traditionally covered [20, 51].

Furthermore, when thinking about invisible labor in crowd work, we have to consider that much of the labor that crowd workers complete is fed into machine learning models that power the A.I. industry [72, 106]. For instance, crowd workers might label content so that Facebook’s News Feed algorithm will not recommend posts that are filled with hate speech or pedophilia [17, 46]. Crowd workers might also transcribe audio to help Amazon’s Alexa better understand the user [6]. Given that most end-users are unaware that there are humans helping to power the A.I. services they access [51], the work done by workers and their possible unfair labor conditions, are hidden from sight. Notice that here the invisibility of crowd work is again not just due to requesters and their HIT design choices, but rather it is an issue within the A.I. industry as a whole.

In this particular research, we focus on measuring the different categories of invisible work that the book of Ghost Work identified that exist within the context of crowd work [51]. We believe that by quantifying the different costs that invisible work has in this setting, we can design better solutions to improve crowd workers’ conditions. Notice that invisible labor in crowd work includes activities that go unnoticed while doing paid work, such as finding HITs and communicating with requesters to resolve conflicts [42, 55, 57, 97]. Invisible labor in crowd work has recently gained more attention because it has become clearer that the independent nature of crowd work has led workers to now have to assume invisible labor that was traditionally taken by companies and employers [20, 95]. In this work, we present computational mechanisms for quantifying for the first time the invisible labor that exists in crowd work and bring much needed light to a critical topic.

2.3 Quantifying Working Time

Saito et al. [96] studied different ways to measure the time crowd workers spent completing HITs using their system called TurkScanner. They found that through web plugins, they could quantify

how much time workers spent completing HITs. We built upon their methodology to properly measure the working time on HITs and expand their method to now also measure time spent in unpaid work. Hara et al. [57] also used plugins to measure the wages of MTurk workers. Ignoring unpaid work, they estimated an average hourly wage of \$3.18, which roughly coincides with the average hourly estimate of \$3.76 that our study uncovered when we also ignore unpaid work. This shows that our measurement instrument is roughly calibrated to theirs (we likely had higher hourly wages because we considered more conservative measurements). We build on their work and provide a more detailed accounting and classification of the unpaid work that workers endure.

3 METHODS

The goal of our IRB-approved field study is to measure and contrast the time that crowd workers spent on invisible labor and the time they spent on regular paid labor (i.e., completing HITs.) Since this data is not part of the official MTurk API, and prior work has not been able to measure invisible labor at the level of detail in which we were interested, we build computational mechanisms to measure these variables. Armed with these computational mechanisms, we conduct a field study to investigate in the wild how much time workers on MTurk dedicate to invisible labor. In the following, we describe how we measured these activities through the computational mechanisms that we designed and detail how we conducted our field study. It is important to highlight that our computational methods for measuring invisible labor focus on measuring invisible labor in a conservative manner. We consider it is best to err in underestimating the amount of time that workers spend in invisible labor than to overestimate. We make this design decision because quantifying invisible labor can potentially call attention to the structural issues surrounding crowdsourcing markets and the conditions they provide workers. Operating in a conservative manner helps us to avoid being labeled as “exaggerated activists” and allows us to present the study in a scientific, objective way. This approach helps us to bring much-needed attention to understanding invisible labor in crowd work. As we will see, even with erring on the side of underestimating invisible labor, it is still a sizeable overhead for the workers.

3.1 Computational Mechanisms to Measure Invisible & Paid Labor

For our study, we need computational mechanisms for: (1) detecting when a worker is doing invisible labor or when she is doing paid work; and (2) measuring how much time a worker invests in each of these two activities. To address these two points, we created a Chrome Extension (plugin).

3.1.1 Methods for Quantifying Paid Labor. Our plugin builds on prior research that was able to detect and measure with plugins when a crowd worker was completing a HIT, the amount of time the worker invested in completing the HIT, and the daily earnings that workers made from the HITs (notice that this value is important as it can help us to quantify the monetary costs of invisible labor)[96]. In particular, building on prior work, we developed a plugin that can: 1) automatically record the exact times when a worker accepts a HIT and when she finishes and submits the HIT; 2) track when a tab about a HIT is in focus and automatically record the time period in which the worker is active on the HIT page tab by checking whether there were any type of interactions from the worker (e.g., mouse movements, typing) under a given time window; and also 3) measure the daily income that each worker makes from these HITs by querying the information from their workers’ dashboard on MTurk. In summary, as a starting point, we developed our own plugin that mimics prior work and quantifies the amount of time that a given worker dedicates to completing HITs and the earnings that the worker is making.

3.1.2 Methods for Quantifying Invisible Labor. Next, we expand the plugin to now provide new functionality through which we can also track and measure the time workers spend on invisible

labor. Notice that we focus on quantifying invisible labor in a conservative manner, which means that we prefer to err on the side of under measuring the invisible labor (we took this methodological decision based on the reasoning stated above). Our conservative approach to the measurement of invisible labor comes in especially when we consider cases where there is disagreement in the literature on whether an activity is invisible work or not [47, 94]. In such cases, we prefer not to label the activity as invisible labor. We prefer to underreport so that the invisible labor we measure will be at least as large as we quantify here, if not larger. Some of the discussions around what is and what is not invisible labor especially arise for the activities of “reading instructions of the HITs”, and “taking breaks” [25, 36, 43, 47, 51, 76]. Gray and Suri [51] label “reading instructions” and “taking breaks” as examples of invisible labor activities. However, we decided not to categorize these activities as invisible labor because there is research that considers these two activities as part of paid work [25, 36, 43, 47, 76]. Now, given that workers are not actually paid for either of these two activities, we designed our computational methods to detect when workers take breaks or read instructions; but, we do not count these activities as either paid nor invisible labor. It is important to highlight that because workers are not paid any wages for reading instructions, it is incorrect to categorize the work as being paid.

Our plugin, therefore, in addition to what prior work had already developed, provides now the novelty of being able to detect and quantify all other activities that workers do aside from completing HITs. For this purpose, we developed new computational mechanisms to detect when a worker is visiting other parts of the MTurk platform that are different from the HIT page tab² (e.g., perhaps the worker entered the MTurk page to search for HITs³ or the worker entered the MTurk page for sending messages to requesters⁴). Our plugin tracks the exact time when a worker enters one of these other MTurk domain pages and then scrapes and parses the HTML of the page to understand how the worker interacted with the page and identifies the intervals of time in which the worker is active on these other pages. We consider a worker to be active on a page when the worker has the page in focus and does any type of user interaction on that page, e.g., mouse movements, scrolls, clicks, keyboard typing. Notice that we do not track what a worker does on these pages (e.g., we do not track what they type). We simply detect that they are active on a particular MTurk page. To accomplish all of this, we developed two new components into our plugin: a page crawler and a time-driven background process that detects the different browser events that happen on MTurk (e.g., that the worker visited another page on MTurk, or that she started typing, or began a new HIT). The page crawler detects the current MTurk domain page that the worker is on, as well as the status of the page (e.g., that the page is loaded, active, inactive, or closed). The background process focuses on detecting the HITs that the worker is currently doing and identifying which she has finished. In order to accomplish this, the background process polls workers’ task queues on MTurk every 30 seconds. From the task queue, the background process obtains the metadata and status of all the HITs the worker has accepted to do. Notice that the page crawler is the primary element that we use to detect whether the worker is completing paid labor or invisible labor. The background process helps our plugin to be able to better detect when the worker is completing HITs (some of them reside outside the MTurk platform) and also when the worker is multi-tasking (doing multiple HITs at the same time.) Through this, we create a plugin that automatically detects when a worker is doing invisible or paid labor and the amount of time the worker invested in each of these two activities. Our plugin is available here: <https://github.com/anonym-research/invisible-labor>.

²<https://worker.mturk.com/>

³<https://worker.mturk.com/?filters>

⁴https://worker.mturk.com/contact_requester

3.1.3 Quantifying Types of Invisible Labor. We were not only interested in detecting whether or not a worker was doing invisible work; we also wanted to understand what type of invisible labor was the most taxing and contextualize our results with prior interview work that started to document the invisible labor that workers perceived by conducting interview studies with them [51]. In the following, we present the different types of invisible labor we consider (i.e., broad categories) and how we detected their related individual activities. The categories and activities we study are based on prior interview research that studied invisible labor [51, 113]. Note that for most cases, we detect that a worker started a new activity when they loaded, focused, or changed their browser tab to a page on MTurk related to that particular type of invisible labor (below, we mention which pages relate to specific invisible labor activities). Similarly, our plugin considers that a worker paused or finished an activity when the worker changed to another tab, unloaded, blurred, or closed the MTurk page related to that particular activity. The categories and activities we consider are:

(a) Category: Hypervigilance. This category involves workers spending time in: (1) identifying good work, e.g., “*wading and sorting through spam or suspicious offers for at-home-work.*”[22]; and (2) being “on-call,” ready to do HITs for requesters at any time. Invisible activities include:

- *Watching over requesters’ profile:* Notice that this activity relates to Hypervigilance because workers are visiting requesters’ profiles to be ready to do any HIT that requesters post. In other words, workers are “on-call.” To detect this activity, our page crawler detects when a worker is on a requester’s profile page.
- *Searching for general HITs (unfiltered):* To detect this activity, our page crawler identifies that a worker is on the main page where HITs are posted.
- *Searching for filtered HITs:* Our page crawler detects when the search URL for the main page of HITs has a query in it to filter HIT results. This activity relates to hypervigilance as it involves “wading and sorting” through HITs.
- *Managing their queued HITs:* this activity relates to Hypervigilance as it involves workers filtering out fraudulent HITs and focusing on HITs from specific requesters (i.e., being “on-call”). To detect this, our crawler identifies when a worker is visiting her tasks queue.
- *Checking their own qualifications:* This activity relates to Hypervigilance as prior work has identified that workers watch over their own qualifications to vigilantly identify whether they could now access certain HITs and thus more effectively find and access quality labor [51]. In this case, our crawler detects when the worker is viewing her earned qualifications.

(b) Category: Lack of Guidance. Crowd workers are generally left on their own to figure out how to do jobs as fast and accurately as possible [86]. Activities related involve:

- *Starting HITs but then returning them:* This activity relates to “Lack of Guidance” as it usually occurs because workers believe the HITs will be different than what they actually end up being [49, 88] (e.g., less complex or of another nature.) The lack of guidance leads workers to have to return HITs they already started. In this case, our crawler detects when workers click the return HIT button on MTurk.
- *Sending messages:* Workers send messages to requesters to ask them questions about a HIT and better understand what the requester wants. To detect this type of invisible labor, our crawler detects when a worker opens MTurk’s messaging form to send a message.
- *Reading HIT information:* Page crawler detects when a worker clicks the “More Info” option while previewing or working on a HIT. Notice that this activity is different from reading HIT instructions, as reading HIT information helps workers get a preview of what a HIT is about. It is an activity that workers have to do in order to obtain guidance.

- *Previewing HITs:* Page crawler detects when the page of a HIT is open in preview mode. Notice that here we could potentially say that workers are previewing HITs in order to “vigilantly” find tasks from certain requesters (and hence this activity could be labeled as being from the category of Hypervigilance). However, the search filtering option allows workers to do that more effectively, and that is also not the main purpose of the preview [70]. We, therefore, decided to categorize this activity as Lack of Guidance. Additionally, prior work has labeled this activity as related to guidance [83, 116].
- *Reading platform help:* Page crawler detects when workers are in MTurk support sections.

Notice that within this category, we could have considered the activity of reading instructions as part of the invisible labor that a worker has to do related to the lack of guidance. However, as mentioned before, we opted to just detect the activity but not label it as invisible nor paid labor. To detect the activity of “reading instructions,” the page crawler detects the time that passes from when a worker accepted a HIT until the worker has her first interaction with the HIT (e.g., she presses a key, or she opens another tab related to the HIT, etc.) We assume that this time-lapse corresponds to when the worker is reading instructions.

(c) Category: Payments. In crowd work, even after workers have vigilantly identified legitimate labor and they have been able to figure out how to complete the work, they still run the risk that they will not get paid for their efforts. The broad category of “Payments” encompasses the invisible labor that workers do to ensure payment and also instances where they worked on HITs but were not paid. This category of invisible labor includes:

- *Visiting their worker’s dashboard:* workers visit their dashboard to oversee if requesters have paid them and ensure they made a certain amount of daily income. To detect this activity, our crawler identifies when workers are visiting their general MTurk dashboard.
- *Doing HITs that eventually timeout:* Some HITs have an expiration time on them. If workers take longer to complete the HIT than the allowed expiration time, the HIT times out. In these cases, workers are not paid for any of the labor they have done on the HIT, and thus we consider this activity within the broader category of Payments. To detect these instances, the background process of our plugin identifies when a HIT has an end time equal to or higher to the HIT expiration time. Our plugin also checks in the worker’s dashboard that the worker was never paid for those HITs.
- *Viewing their earnings:* Page crawler detects when workers are in earning sections on MTurk.

(d) Category: General Logistics. The last category we detect relates to MTurk logistics. We focus on the activities of logging into MTurk. Our crawler detects when workers log into MTurk.

3.1.4 Detecting and Processing Multi-Tasking. When measuring the time workers spent in completing HITs, it is important to properly detect when workers are multi-tasking and properly measure and account for the time they spent doing so [74]. In our study, we refer to multi-tasking as when a worker accepts multiple HITs or batches of HITs around the same time and then starts completing these multiple HITs. The background process of our plugin checks the workers’ tasks queue to detect workers completing HITs via multi-tasking. To account for this time, we adopt an approach similar to prior work [96]. A common feature of working in this manner is that the HITs are chained in succession. This means that the start and end times may overlap with one or more HITs in the batch. Also, similar to prior work [96], our study does not consider batch HITs that take more than one day to be completed (0.6% of our sample). We filtered out all the multi-day batches and HITs since these imply computing the effective working schedule of each worker.

3.2 Field Study

The purpose of our field study was to have workers use our plugin and through it measure in the wild the amount of time workers dedicate daily to invisible labor. Armed with our plugin that could detect and measure the amount of time workers dedicated to different types of invisible labor, as well as the time they dedicated to paid labor, we conducted a field study that lasted a week. Note that we included weekends in our analysis as MTurk presents itself as a platform that offers workers the flexibility to work whenever workers want (weekends included). Similar to prior work [58, 98], we did not see changes in the days workers completed tasks.

3.2.1 Field Study Logistics. We recruited workers from MTurk by posting a HIT inviting workers to our study. We also used mailing lists of Turkers (workers on MTurk) who had participated previously in studies with us. For our study, we first surveyed participants on their perceptions of how much time they estimated that they spent on invisible labor. We asked workers to report how much time they felt they invested on MTurk: searching for work; looking over their worker dashboard; sending messages to requesters; and doing HITs that eventually timeout. This helped us understand workers' prior beliefs and awareness of invisible labor and how much time they believed they spent on it. We also asked workers about how COVID-19 had affected them (none of our participants expressed any work disruptions). Our initial survey also asked workers about their basic demographic information, such as current location, gender, disabilities, etc. Overall, we based our survey on prior work [37, 58].

After the initial survey, we asked participants to: (1) install and use our plugin for a week; (2) work on MTurk as normal; (3) visit the plugin dashboard, which showed to each worker graphs of how much time the plugin detected that they invested in different MTurk activities for a given day. At the end of the field study, workers completed a short survey evaluating the accuracy of the plugin in detecting and measuring the amount of time they spent on different activities on MTurk. In general, workers in our study stated that they felt that our plugin was able to adequately track the time they spent daily on MTurk completing HITs and doing different invisible labor activities (the median score for the plugin's accuracy was 4 on a 5 point Likert scale). We paid each participant \$10 USD for taking part in our study. Notice that this accounts for the US federal minimum wage (\$7.25/hour) as our initial survey took 5-8 minutes to complete, the installation of our plugin took less than 4 minutes, and the end survey we gave participants took 5-8 minutes.

4 RESULTS

We had 100 MTurk workers install and use our plugin for a week. We allowed all types of workers to participate in our study. This resulted in us recruiting 21 "master workers" and 79 "non-master" workers. Note that we considered that a worker was a master worker if we detected that they had completed at least one HIT with master qualifications.

Table 1 presents the statistics of the workers in our study and their general labor patterns. We had 73 men and 27 women, who had a median age of 30 years old. 41 participants were from the United States, 45 from India, five from Brazil, three from Italy, and the remaining six from Venezuela, Spain, Mexico, United Kingdom, United States Virgin Islands, and Thailand.

Through our plugin, we identified that workers did a median of 30 HITs each day. The median daily earnings of each worker were \$8.07 US dollars. Figure 1 presents the median amount of time that each worker invested in completing HITs during our one-week study. Each bar represents a worker, and the bars are sorted along the X-axis based on the median amount of time they worked daily on MTurk. The Y-axis shows the amount of time each worker dedicated to completing HITs or doing invisible labor. The light gray part of each bar shows how much time the worker spent doing HITs, and the dark gray part shows how much time they spend doing invisible labor. Observe

Description of the Statistics	Value
Total number of workers in our study	100
Total number of HITs workers did in a week	40,903
Minimum number of HITs a worker did in a week	1
Median number of HITs a worker did in a week	185
Maximum number of HITs a worker did in a week	3,168
Minimum number of HITs a worker did per day	0
Median number of HITs a worker did per day	30
Maximum number of HITs a worker did per day	1,149
Minimum time a worker invested in completing HITs per day	0 min
Median time a worker invested in completing HITs per day	1:07 hrs
Maximum time a worker invested in completing HITs per day	7:36 hrs
Minimum time a worker invested in invisible labor per day	0 min
Median time a worker invested in invisible labor per day	33 min
Maximum time a worker invested in invisible labor per day	5:31 hrs
Minimum earnings made by a worker in a week	\$0.92
Median earnings made by a worker in a week	\$55.39
Maximum earnings made by a worker in a week	\$542.06
Minimum earnings made by a worker per day	\$0.01
Median earnings made by a worker per day	\$8.07
Maximum earnings made by a worker per day	\$178.62
Median hourly wage with invisible labor	\$2.83
Median hourly wage without invisible labor	\$3.76
Percentage of workers who multi-task	96%
Minimum number of batches a worker did in multi-tasking	1
Median number of batches a worker did in multi-tasking	32
Maximum number of batches a worker did in multi-tasking	333
Minimum number of HITs a worker did in a batch	2
Median number of HITs a worker did in a batch	3
Maximum number of HITs a worker did in a batch	689

Table 1. Summary statistics of the workers in our study with regard to: HITs workers did, the time they invested in working, workers' earnings, and their multi-tasking information.



Figure 1. Overview of the labor patterns of each worker in our study.

that invisible labor occupied a substantial amount of workers' overall time. The median time that workers invested daily in completing HITs was 1 hour 7 minutes, and the median time that workers invested in invisible labor was an additional 33 minutes, with some workers spending a maximum

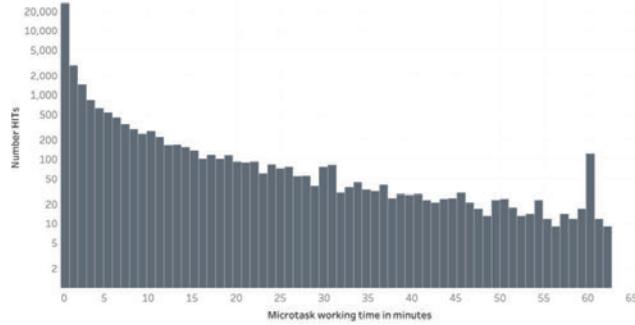


Figure 2. Working time distribution of the HITs that crowd workers in our study completed.

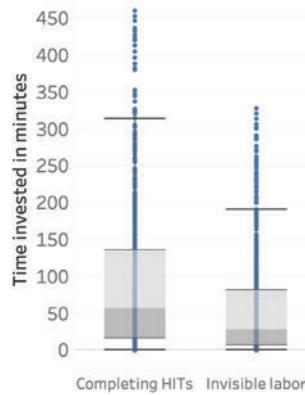


Figure 3. Box plots showing the time that workers dedicate to completing HITs and doing invisible labor.

of 5 hours and 31 minutes daily. Notice that to calculate this value, we summed up all of the time that workers invested in the different invisible labor activities that our plugin detected. Workers spent a median of 33% of their daily time on MTurk doing invisible labor.

We also graphed a histogram of the amount of time that workers dedicated to completing HITs (see Fig. 2). This graph helps to calibrate whether our plugin is measuring paid labor adequately as we can compare our findings to prior work [98]. Note that we used a log scale on the y-axis so that the distribution was easier to visualize. From here, we observe that similar to prior work [96], the distribution of the time that workers invested in completing HITs had a long tail that was heavily weighted towards shorter tasks, meaning workers usually did HITs that took under a minute.

Next, we were interested in studying whether there was a significant correlation between the time workers spent working and the time they spent conducting invisible labor (as this can help us to better understand the phenomena of invisible labor). For this purpose, we computed the Spearman's correlation and obtained 0.283 (p-value 0.004) for the time workers spent working and time doing invisible labor, and 0.517 (p-value 0.000) for the percentage of time working and time in invisible labor. Given these values, for both cases, we reject the null hypothesis that the samples are uncorrelated, i.e., we identified that there is correlation between the time workers' spent working and the time they spent completing invisible labor. Future work could thus study the type of paid labor that might minimize the amount of time a worker has to dedicate to invisible labor.

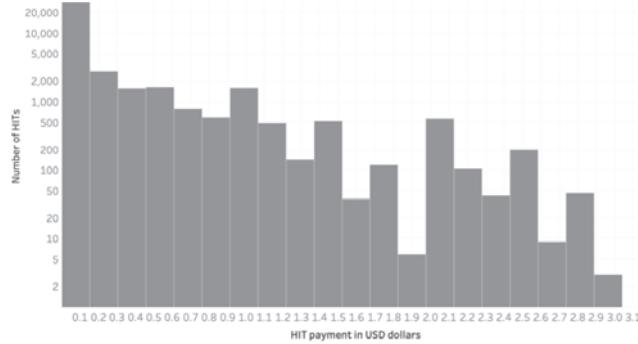


Figure 4. Payment distribution of the HITs that crowd workers in our study completed.

4.0.1 Quantifying Invisible Labor and its Economic Costs. We aimed here to understand the economic costs that invisible labor has on workers' wages. For this purpose, we first visualized in greater depth the median time workers spent daily in invisible labor and in completing HITs (see Fig. 3). We also aimed to understand the distribution of payments of the completed HITs (see Fig. 4). Armed with this information, we calculated the median hourly wage of workers. We used an approach similar to prior work [57, 98]. We first calculated the total hours a worker spent completing HITs on a given day D . We call this the worker's $WorkingHour_D$, and it is the sum of all the time series ($Time_{S,d}$), measured in hours, that the worker dedicated to doing HITs on day D within the time period d :

$$WorkingHour_D = \sum_{d \in D} Time_{S,d} \quad (1)$$

After this, we obtain the total $Income_D$ the worker made on day D . We take this value from the rewards and bonuses logged on the worker's "Daily Income" on her MTurk dashboard. For worker w , her overall hourly wage for day D is:

$$w_D = \frac{Income_D}{WorkingHour_D}. \quad (2)$$

With this, we calculate for each worker her hourly wage for each day of our study. We then use that information to calculate the median hourly wage of the 100 workers participating in our study.

Excluding invisible labor, we calculated that workers earned a median hourly wage of \$3.76, which roughly coincides with prior work, which calculated \$3.18 [57]. Notice that it is likely that we calculate a slightly higher salary because we utilize a slightly more conservative approach for our measurements, with the purpose of limiting the overreporting of invisible labor that workers do. Now, if we include invisible work into the calculation of the hourly wage, the median hourly wage of workers drops to \$2.83. Next, we were interested in better understanding the dynamics around invisible labor and wages. Figure 5 presents a scatter plot where each point represents a worker. The X-axis represents the median percentage of time a worker invested in invisible labor daily, and the Y-axis the worker's median daily wage. From Fig. 5, we observe that the highest-earning workers, in general, all invested less than 50% of their time in invisible labor. Given this result, there might be value in exploring coaching systems that teach workers how to best manage their invisible labor to ensure high wages.

4.0.2 Invisible Work for Different Segments of Workers. In this section, we provide a breakdown of the different demographics of workers in our study (segments) and study the type of invisible labor they presented in their work practices. This analysis is important as research has started to

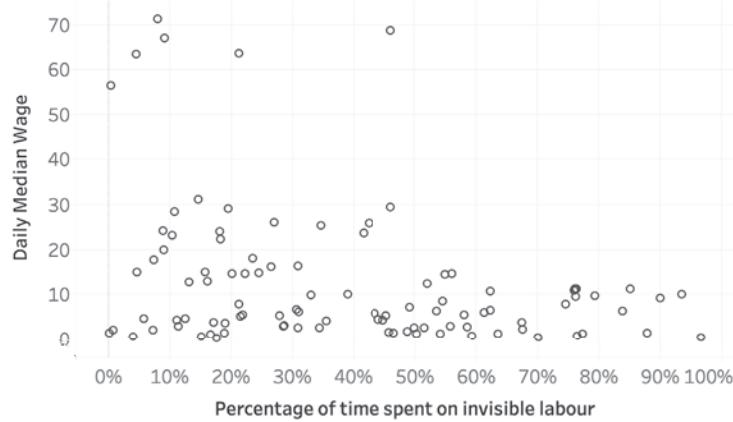


Figure 5. Overview of the percentage of time each worker spent daily on invisible labor (X-axis) and their median daily wage (Y-axis).

Workers' segment	Working Time	Invisible Work	Unpaid rate	Payment	# workers
Masters Workers	1hr 37min	24min	19.8%	\$13.8	21
Non-Masters Workers	58min	43min	42.5%	\$5.5	79
Workers based in United States (English Speaking)	1hr 28min	27min	23.4%	\$11.9	41
Workers based in India (English Speaking)	42min	35min	45.4%	\$4.0	45
Workers based in Brazil (non-English Speaking)	18min	1hr 15min	80.6%	\$1.9	5
Workers based in Italy (non-English Speaking)	1hr 11min	1hr 34min	56.9%	\$9.5	3
Women	1hr 02min	42min	40.3%	\$8.2	27
Men	53min	28min	34.5%	\$5.5	73
18-24 years old	26min	33min	55.9%	\$3.3	9
25-34 years old	1hr 01min	45min	42.4%	\$6.3	52
35-44 years old	59min	22min	27.1%	\$5.9	22
45-54 years old	55min	20min	26.6%	\$6.6	9
55-64 years old	1hr 12min	36min	33.3%	\$9.8	6
65-74 years old	21min	19min	47.5%	\$1.3	2
No impairment declared	54min	31min	36.4%	\$5.7	93
Mobility impairment	1hr 19min	19min	19.3%	\$15.9	5
Mental disorder	1hr 16min	1hr	44.1%	\$9.2	2
Frequently multi-task	1hr 04min	28min	30.4%	\$6.7	42
Rarely multi-task	48min	32min	40.0%	\$5.4	58
Use tools	1hr 03min	37min	37.0%	\$6.8	79
Not use tools	33min	21min	38.8%	\$3.1	21

Table 2. Median of times and payments per segment. The unpaid rate shows the percentage of the total working time that is unpaid (invisible work). The payment amount represents the median daily payment.

showcase how workers' different demographics can impact how they approach work on MTurk [37, 58, 90, 102]. We were thus interested in further studying and understanding this aspect, but now for invisible labor. In Table 2, we present an overview of the amount of paid labor and invisible labor that different population segments conducted. Notice that in the table, we also calculate the

“unpaid percentage ratio,” which denotes the percentage of the total working time that is unpaid. We calculated the unpaid percentage rate as follows, where *Invisible_Labor_Time*, is the median time workers in a particular segment spent on invisible labor, and *Paid_Labor_Time* the median time workers in that segment spent on paid work.

$$Unpaid_Rate = \frac{Invisible_Labor_Time}{Invisible_Labor_Time + Paid_Labor_Time} \quad (3)$$

Armed with these measurements, we next conducted statistical analysis to study whether there were significant differences between how invisible labor impacted the different segments of workers. First, over each worker segment we performed the Shapiro-Wilk test, which allows us to identify whether our distribution is normal or not. We found that for all the segments, the p-value was less than .05, so we rejected the null hypothesis (i.e., our distribution is not normal). Given that we do not have a normal distribution, we proceeded to use a non-parametric analysis of variance. We performed a Kruskal-Wallis H Test as a non-parametric alternative to the parametric one-way between-groups analysis of variance for independent groups. We found that there was a significant difference (p-value < 0.05) in the invisible labor time between the workers who were: Masters and Non-masters (p-value 0.00), male and female (p-value 0.04), tool users and non-tool users (p-value 0.01), from English speaking countries and non-English speaking countries (p-value 0.02). We did not find a significant difference among the following groups: workers without disabilities and workers with some disabilities (p-value 0.64); workers who do multi-tasking and workers who do no multi-tasking (p-value 0.32); workers in the U.S. and workers in India (p-value 0.07).

Next, we dug deeper into several of these results to better understand the dynamics behind invisible labor and workers’ demographics. Table 2 shows that from the 100 Turkers who participated in our study, 21 of these were MTurk Masters, and 79 were not. We found that the median amount of time that master workers invested in completing HITs daily was 1 hour and 37 min and the median amount of time they invested in invisible work daily was just 24 minutes, as shown in Table 2. Non-master workers worked slightly less time on HITs and spent more time on invisible labor than master workers. Non-master workers spent a median of 58 minutes daily completing HITs and a median of 43 minutes on invisible labor (almost double the time to what master workers invested.) Thus, workers with the Masters distinction spent more time working and less time doing invisible work than non-masters. Overall, a key takeaway from Table 2 is that Master workers perform 23 percentage points less invisible work than non-Masters workers (20% vs. 43%) and earn a median of \$8.3 more a day. Naturally, 21 Masters is not a huge sample, so one should view this result as suggestive and follow up with future work to confirm. There are also a variety of explanations for this finding. It could be that the experience and know-how of the Masters workers help them minimize the amount of time they spent doing invisible work. Similarly, it could also be that Masters workers have more experience using tools. 86% of our Masters worker participants reported using tools, while only 57% of the non-masters workers reported tool use. Additionally, these workers might not be using these tools as effectively as the master workers. Prior work had identified that there are differences in how experts and non-experts use tools [67, 98].

However, it is important to highlight that Table 2 does show that workers who used tools spent more time doing paid work (30 minutes more) and earned substantially higher wages (\$1.3 USD more daily, when measuring workers’ median wages.) Notice that these results might be emerging because most tools focus on increasing the wages that workers receive for their paid labor [67]. But, given our results, we believe there is value in exploring mechanisms through which workers learn how to better navigate crowdsourcing markets to focus primarily on paid work.

Within this study of worker segments, we also studied the relationship between adopting particular strategies and invisible labor. Prior work has shown that experienced workers often use

Invisible Labor Activity	Mean [min]	Median [min]	Std [min]	% workers
Doing HITs that eventually timeout (Payments)	32.3	4.5	1.5	37%
Starting HITs but then return (Lack of Guidance)	11.2	4.2	12.1	92%
Viewing their worker's dashboard (Payments)	10.6	2.8	16.3	97%
Sending messages (Lack of Guidance)	2.4	1.9	0.7	51%
Watching over requesters' profiles (Hypervigilance)	15.0	1.1	12.9	69%
Searching for general HITs (Hypervigilance)	3.6	0.9	5.6	96%
Managing queued HITs (Hypervigilance)	3.2	0.7	4.6	93%
Previewing HITs (Lack of Guidance)	1.5	0.6	1.0	66%
Viewing their earnings (Payments)	0.9	0.5	0.3	85%
Searching for filtered HITs (Hypervigilance)	3.9	0.5	0.6	46%
Checking Worker's qualifications (Hypervigilance)	0.4	0.2	0.0	27%
Login to MTurk (General Logistics)	0.3	0.1	0.1	64%
Reading HIT information (Lack of Guidance)	0.1	0.0	0.0	63%
Reading Platform Help (Lack of Guidance)	0.0	0.0	0.0	0%

Table 3. Overview of the invisible labor activities that workers did, the amount of time they dedicated daily to each activity per day, and the percentage of workers who engaged in the activity. Doing HITs that eventually time out was the median most time consuming activity; viewing their earnings was the most common activity.

Main Category of Invisible Labor	Mean	Median	Std
Payments	14 min	13 min	23.8
Hypervigilance	28 min	11 min	56.8
Lack of Guidance	16 min	6 min	62.1
Breaks	3 min	3 min	12.6
General Logistics	1 min	1 min	0.1

Table 4. Overview of the categories of invisible labor that workers did and the median amount of time they dedicated to it daily. The category of Payments was the one workers invested the most median time daily.

strategies to boost their performance [54, 98]. This can include using different tools or multi-tasking. Our study identified that workers who completed HITs in batches did 9.6% less invisible work than workers who did not (see Table 2). The reasoning behind this finding is likely that within batches, the same type of tasks is continuously presented to workers (one after the other). Therefore, workers do not have to search for new tasks (thus reducing their invisible labor). Batch tasks are also usually similar, so workers do not have to spend time context switching [74].

4.0.3 Quantifying Categories of Invisible Labor. We were also interested in understanding the type of invisible labor that was the most taxing for workers. Table 3 presents an overview of the different invisible labor activities that our plugin detected that workers did and the percentage of workers who engaged in each activity. For each activity, we also present in parenthesis the main categories to which the activity belongs. In Table 4, we present a summary of the time workers invested in each of these main categories. From Tables 3 and 4, we observe that the invisible labor category of “Payments” was the most time-consuming category (especially when taking the median value) and was also highly common among workers. For example, Table 3 shows how 97% of all workers in our study engaged in the Payments related activity of checking their daily earnings on their worker dashboard. Similarly, the most time-consuming activity was “doing HITs that eventually

timeout,” which took a median of 4.5 minutes. Luckily, timeouts were not as common (only 37% of workers engaged in this activity). It is important to mention that timeouts relate to “Payments” because requesters on MTurk have to specify the amount of time that workers have for completing their tasks; if workers take longer than that time, the HIT is timed out, and workers do not get paid for any of the labor that they did for the HIT. We calculated timeouts only if the worker was actually working on the HIT (had any current mouse or keyboard-related activity on the HIT). The timeouts we detected were, therefore, cases where the worker was actively doing labor but at the end did not get paid for it.

To understand the details of the workers who engaged the most in this type of highly taxing invisible labor, we first identified the workers who were outliers (i.e., invested the most time in this activity) and then conducted a manual inspection of their digital traces. We considered outliers to be the workers whose time invested for this particular activity was above the 95th percentile (typical method to calculate outliers [56]). We observed that in this case, the outliers tended to be workers who accepted a high number of HITs within a given time window (likely to avoid having other workers take the HIT before them). However, the problem was that it would sometimes take workers significant time to get to some of the HITs they had “reserved” for themselves, and hence they experienced timeouts. We thus believe there is value in exploring tools [81], that based on workers’ log data, can automatically learn the best amount of time that should be allocated for a given task and then recommend to requesters to use a significantly higher time window than that time to avoid timeouts and also be sympathetic with the labor practices of some workers.

Table 4 also shows that the second most time-consuming category was that of Hypervigilance, taking workers’ a median of 11 minutes daily. The Hypervigilance activity that took the most time was watching over requesters’ profiles. It is likely that workers engaged in this activity because through this they could more easily grab the HITs that their favorite requesters posted [51]. Upon manual inspection of workers’ digital traces, we identified that the workers who invested the most time in this activity (i.e., the outliers, which we calculated with a similar method as stated above), were the workers who appeared to hunt the profiles of multiple requesters ready to be “on-call”. (In specific, these workers opened the profile pages of multiple requesters and then iterated through the list of profile pages, likely inspecting if the requesters had posted anything new.)

Finally, the third most time-consuming category was “Lack of Guidance,” which took a median of six minutes daily. The most time-consuming activity here were cases when workers started a HIT but then decided to return it. There are several reasons why workers might engage in this behavior; for example: workers realize that the HIT is more time-consuming than they expected; or the HIT involves skills that the worker lacks; or the HIT consists of activities that the worker does not enjoy. In general, these are instances where the HIT instructions likely did not correctly guide the worker on the type of labor to expect, and hence the worker had to return the HIT. Prior work has already reported how the lack of guidance can lead to these types of dynamics [43, 83]. From Table 3, we note that the activities related to the Lack of Guidance were actually some of the most commonplace for workers and also some of the most time consuming (e.g., 92% engaged in starting HITs but then returning them; and this was also the second most time consuming activity.) It was surprising to see the large percentage who returned HITs. Upon manual inspection of the outliers, we observed that they appeared to primarily follow a discard-by-doing labor pattern [68].

4.1 Perceptions of Invisible Labor

Workers from digital labor platforms typically underestimate the actual amount of time and effort they dedicate to invisible labor [113]. However, workers’ perceptions of invisible labor can play a strong role in how they feel about their work. In this section, we investigate the amount of time that crowd workers believe they invested in invisible labor and their satisfaction. For this part, we

Perception of Time in Invisible Labor	Percentage of Workers	Perceived Time	Actual Time
Far too much time	25%	3 hrs 4 min	2 hrs 23 min
Too much time	38%	2 hrs 3 min	1 hr 40 min
An adequate amount of time	29%	1 hr 50 min	1 hr 32 min
Too little time	5%	1 hr 15 min	56 min
Far too little time	3%	1 hr	40 min

Table 5. Summary statistics of workers' perceptions of how much time they felt they invested in invisible labor. Notice that the perceived and actual times are the medians for each perception group.

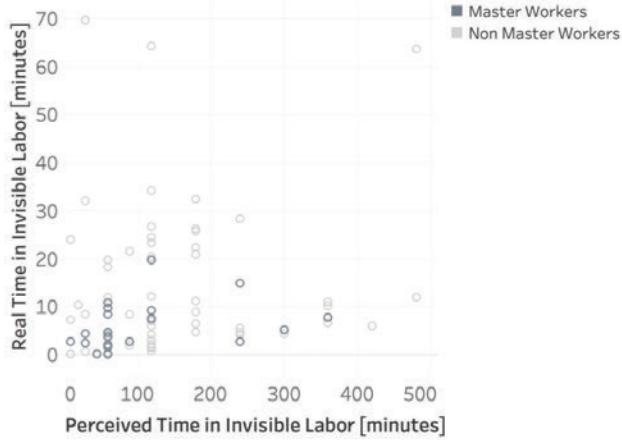


Figure 6. Comparisons of the estimated and actual time that workers invested in invisible labor. Most workers overestimated how much time they dedicated to invisible labor.

use the initial survey that we gave workers, which was inspired by prior work [4]. Through this, we found that workers in our study estimated that they spent a median of 2 hours daily on invisible labor on MTurk (with the minimum time that some workers' estimated as 0 and a maximum of 8 hours.) Figure 6 plots the actual time workers invested in invisible labor against perceived time. Notice that each point represents a worker in our study, and workers are color-coded based on whether workers are master-workers (dark gray) or non-master workers (light gray). We made this distinction given that prior work has identified that there are differences in how more experienced workers operate [54, 98], and our results in the previous sections were also highlighting these differences. Notice that workers in Figure 6 who were able to accurately guess the amount of time they spent on invisible labor are located on the diagonal line, as that is when the actual time is equal to the perceived time. The cluster of points that we observe above the diagonal line close to the Y-axis showcases that the majority of crowd workers in our study overestimated the amount of time that they thought they invested in invisible labor. Notice that this overestimation occurred for both master and non-master workers. Next, we quantify the relative error of workers in estimating how much time they invested daily in invisible labor:

$$1 - \left(\frac{\text{estimated_invisible_labor_time}}{\text{actual_invisible_labor_time}} \right) \quad (4)$$

Through this, we identified that the median relative error was -0.14 . Notice that the negative value highlights that workers are overestimating how much time they dedicate to invisible labor,

but our conservative metrics used to quantify invisible labor might also contribute to the error. Next, we analyze workers' satisfaction with the time they perceived they invested in invisible labor. Table 5 presents a summary of these statistics. Only 10% felt they invested too little time on invisible labor (8% felt they spent "too little time" and 2% "far too little"), while slightly more than half (63%) felt they invested too much in invisible labor (38% "too much time," and 25% "far too much time"). Lastly, 27% of workers considered they invested the right amount of time in invisible labor. Future work could study the type of labor dynamics that might lead workers to feel more satisfied with the amount of invisible labor that they do, and also what circumstances might lead them to feel the most dissatisfied.

5 DISCUSSION

The core result from our study is that crowd workers spent a median of 33 minutes of their daily time on MTurk doing invisible labor, and this labor leads workers to drop their median hourly wage from \$3.76 to \$2.83. Notice that because we used conservative methods to measure invisible labor, we are obtaining a lower bound of the amount of invisible labor that exists on MTurk. However, this lower bound is still highlighting and providing quantitative support to the literature's qualitative claim that invisible work makes up a substantial fraction of the work done in crowdsourcing markets and, therefore, dramatically reduces workers' hourly wages [51]. Considering that the median hourly wage of workers is just \$3.76 (without considering invisible labor), it is clear that crowd workers still need a dramatic increase in their wages before we can consider this labor fair. However, this is not only something for requesters to consider, but also something for platforms, workers, and even policy makers. In this section, we discuss: the details of the most taxing categories of invisible labor that our study uncovered; design and policy solutions to mitigate invisible labor on crowdsourcing platforms. Additionally, we make an effort to connect with invisible labor in other workplaces, as well as with critical theory, to have a broader discussion on the implications of our research.

5.0.1 Most Common and Most Time-Consuming Invisible Labor. The invisible labor that the overwhelming majority of workers in our study practiced was around Payments. In fact, 97% of the workers in our study visited the earnings section on their worker's dashboard at least once daily. Crowd workers are likely visiting their earnings dashboard to ensure that they: (1) were paid for their labor; and (2) made a certain daily income amount [67]. For the first point, it is important to note that crowd workers typically have to deal with faceless requesters, machines that are outdated, unreliable internet connections, and have nowhere to report when things go wrong (e.g., report that a requester decided to unjustly withhold payment, or report that due to technical issues they can no longer access their MTurk account and earnings.) Pew Research reported that 30% of on-demand gig workers experienced situations where they were not paid for their labor [61, 103]. Similarly, the US Freelancers Union found that 71% of freelancers have struggled to collect payment for their work. As we note, ensuring payment is a critical and stressful aspect of crowd work [62]. For the second point, we have to be aware that most crowd workers struggle to make a minimum wage [57]. Therefore, another likely reason why workers were visiting their earnings dashboard was to see if they had made sufficient wages. The stress of not receiving payment for their labor or not receiving enough appears to be very present and real in crowd work.

Invisible labor around payments was actually also the most time-consuming, and one of the most critical, as it relates to workers' livelihood. To address this problem, designers could explore interfaces where workers are constantly informed of their current earnings. However, seeing their earnings constantly could also create stress on workers. Future work could explore optimal settings for displaying wages in crowd work. We also believe there is value in further exploring interfaces

where requesters, platforms, and workers agree to fair wages [101]. Offering workers a space where they know they will be treated fairly could reduce repeated payment checking [112].

It is important to mention that this type of invisible labor is also present in other digital workspaces [53, 92]. For example, Uber had reports of drivers and passengers organizing to check how much a passenger was actually charged for a ride vs. how much the driver received. This dynamic emerged after Uber changed its pricing algorithm and did not provide transparency on how it functioned [12]. The lack of transparency not only led drivers and passengers to have to engage in this type of invisible labor, it also led them to feel cheated and betrayed by the platform [92]. Here it is important to highlight that this invisible labor does not only emerge due to the fault of requesters (passengers). But rather, platforms can play a key part in the promotion of this invisible labor. Here it can be important for platforms to see that this type of invisible labor is likely emerging out of mistrust and has the potential to alienate people from their platforms.

5.0.2 Second Most Time-Consuming Category of Invisible Labor. Our study uncovered that the invisible labor category of Hypervigilance was the second most time-consuming for crowd workers. Crowd work has been championed as offering people the unique flexibility of working anytime and from anywhere [21, 117]. However, our work highlights how this flexibility is likely more of a myth. Crowd workers have to dedicate significant time daily to search for work and be on-call for requesters. Intuitively, this suggests that there are more workers on the site than there is work to be done. (If there were lots of requesters constantly posting lots of high-paying jobs, workers would not feel the need to be on call to get the good work.) This connects with prior work that shows that requesters have the majority of the power in this market partly due to the fact that there is an extreme concentration of a few requesters who post the majority of the tasks [28, 69]. Thus, workers are forced to take whatever jobs at whatever pay these few requesters post.

A way to start addressing this problem could be to build off the different tools and computational methods that have been developed to achieve fair compensation [112]. Potentially these computational methods could be extended by incorporating an invisible labor component. For instance, workers could be computationally guided to cooperate with each other to ensure fairer wages and minimize the amount of invisible labor in which they engage [32], such approach could be extended to potentially lead to reduced invisible labor. Similarly, we could also consider how algorithms that facilitate automatic task assignment and recommendations [60], could be helpful in reducing invisible labor by minimizing the task search time.

When thinking about the invisible labor around Hypervigilance, it is also important to notice that this type of invisible labor is one that promises workers high returns (especially as by being vigilant, workers can potentially earn high wages). Here, it can be important to identify that other digital labor platforms have started to weaponize this type of invisible labor to manipulate workers to stay longer on their platforms [52, 110]. For example, Uber sends drivers messages to motivate them to keep being vigilant of surge pricing [12]. The following is an example message that Uber sends drivers to motivate them to remain vigilant of surge pricing: *“The weekend is here, and demand is on the rise in Lehigh Valley! Plan to go online tonight, and keep an eye out for surge around the area, where you can earn over 3X on fares! Stay online through midnight to take advantage of the highest fares. Uber on!”* [92]. In this context, we believe there is value in providing workers with tools that can help them to visualize how digital labor platforms might be manipulating them to engage them in free labor. Related, there is likely also value in tools that can inform workers of the likelihood of achieving specific wages if they engage in hypervigilance within particular time windows.

5.0.3 Invisible Labor in Other Workplaces and Policy. Researchers have argued that within our “capitalist societies”, there is a propensity to manage the workforce in ways that will profit the

“capitalists” (who in this context could be considered to be Amazon or the requesters.) [26, 33]. Such “workforce management” can include defining what labor is counted and what labor is turned invisible [18, 19]. Labor visibility (what is counted) is considered to be especially important in this societal context because the cultural worth of a piece of labor is directly connected to how much the labor costs [89]. Work that is done for free (invisible) usually will fail to be valued [3, 33, 108]. Several labor collectives, researchers, practitioners, and individual citizens have therefore fought to empower workers to gain visibility and recognition for their work [26, 41]. For instance, the International Feminist Collective has been fighting for decades to give more visibility to the housework that women perform [33]. The collective has argued that housework has been undervalued, underpaid, and its invisibility has been used as a means to empower primarily “white middle-class men to do lucrative waged jobs,” e.g., office work [19, 40]. This in return has profited companies and factories as they now have a more specialized and dedicated workforce [38, 39, 78].

In 2013, several of these collectives had a breakthrough when labor statisticians agreed internationally to begin measuring in official workforce surveys both paid and unpaid labor, such as housework [9, 11]. This inclusion influenced the development of new policies around invisible labor [9, 11]. Historically, policymakers had overlooked unpaid labor simply because the work was not included in the official statistics that they used to define policy [9, 111]. Its exclusion also meant that policymakers did not understand why the labor was problematic or the number of citizens who were impacted. But, by now counting and including the labor within the official stats that policymakers used for their decision-making, they were able to more easily pay attention to this type of labor, grasp its problematic, and design policy to address the challenges.

Inspired by the impact that the quantification of invisible labor has had in transforming policy within other industries and workplaces, our hope is that our plugin tool, study, and anonymized worker data, can in the future also be used to motivate new policies to improve the labor conditions of crowdworkers. However, given that the use of data in policymaking is usually an organic, political process [23] (which might not be obvious to outsiders, e.g., workers and their advocates), we believe there is value in designing socio-technical mechanisms that guide citizens on how they can best use the data from our plugin to drive policy innovation [16]. This could include tools that guide citizens on the time in which they should release the data on invisible labor to match the political cycle. Being in tune with the political cycle could help citizens to have a better chance at influencing policymakers [111]. Similarly, other tools could focus on helping citizens to easily visualize which policymakers might be most influenced by seeing the stats from our plugin on invisible labor. There is likely also value in tools that can guide citizens on how to use our plugin’s data to gather the public’s support and create pressure on policymakers [7, 105].

5.0.4 Design Implications & Future Work. Future work could explore mechanisms to help workers manage the time overheads from invisible labor. Notice that here there are still numerous aspects of invisible labor that need to be further investigated. For instance, are more experienced crowd workers able to reduce the amount of time they spent in invisible labor in comparison with novices? Our results highlight that at least master and non-master workers have similar perceptions of the amount of invisible labor they do. But more analysis in this space is necessary. Especially because there might be a benefit in designing tools that help novice workers adopt some of the strategies from more experienced workers [54, 98]. Other questions we are interested in exploring in this space are: How does the way that workers manage their invisible labor relate to their wages? How exactly does multi-tasking and context switching relate to invisible labor? Is a worker’s invisible labor increased when workers have to switch between HITs? Are there certain HITs or requesters that magnify workers’ invisible labor? Our hope is that by releasing our plugin, we will enable the scientific community to study this.

Notice that our plugin tool can be easily extrapolated to other digital labor platforms to help workers quantify the amount of invisible labor that they spend on those other workplaces (the only main piece that needs to be changed is the mapping between the websites the workers use and the work done on each platform; primarily if it is paid or unpaid labor). Our hope is that our tool will inspire cross-platform studies on invisible labor and will help the scientific community to derive principles around how invisible labor looks like across digital workplaces. As we described above, our plugin and study could also help to motivate action from policymakers. Facilitating tools for cross-platform auditing can be extremely important as digital labor platforms have traditionally been black boxes. But, to design better platforms or drive policy change, it is crucial to understand what happens inside these platforms. Our hope is that our research will be a step forward to better understand and address the dynamics existing in these online spaces.

We believe there is likely value in exploring data visualizations that could help to better showcase the different types of invisible labor that crowd workers have to do. Here, we could take inspiration from the visualizations that Github has developed to showcase the labor surrounding the writing of collaborative code [26, 77]. Github has made great strides to provide visualizations that help people to rapidly understand the quantity, frequency, and duration of the contributions made by each individual to a codebase. Such visualizations in this context could help requesters to better grasp the amount and type of invisible labor that their tasks are forcing workers to do and potentially lead requesters to better compensate workers for their effort and time [112]. It is important here to consider how to design such visualizations to also not incite unhealthy competition between workers or enable abuse and surveillance from requesters [71, 93].

5.0.5 Critical Theory and Design to Address Invisible Labor in Different Digital Workplaces. An important question in CSCW is whether a new design truly engages with the root cause of a societal problem or if it is primarily dealing with the symptoms of a problem [2]. For example, a design could make a societal problem bearable. However, this might lead people to no longer have a need for addressing the root problem. In this setting, the design could provide enjoyable experiences to end-users; but it could also reinforce the structural issues that are harming end-users. Within this context, Herbert Marcuse, a theorist from the Frankfurt School of Critical Theory [66], introduced the concept of “one-dimensional” people who have a conformist understanding of society that does not allow them to critique or question how society could be different [84]. Marcuse argues that the one-dimensional person has lost her ability to critique society because consumerism has tricked her into having false needs and wishes (notice that consumerism is considered to be “a social and economic order that encourages the acquisition of goods and services in ever-increasing amounts” [8]). As a result, the person focuses on fulfilling those “fake needs” instead of questioning the problematic societal structures in which she is immersed. According to Marcuse, this dynamic leads us to be imprisoned into one-dimensional thinking, and that makes it extremely challenging to critically question the structures and processes that exist in our society.

As CSCW researchers, we believe it is crucial that we question to what extent we are falling into one-dimensional thinking and possibly strengthening the structural issues that are already in place. This is especially important when designing interfaces that aim to address the problem of invisible labor in crowdwork and also within other digital labor platforms. Without this critical analysis, we might fall into designing interfaces that make the problem of invisible labor bearable; but we never address the systematic problems surrounding workers, requesters, and digital platform owners. Notice that engaging in such critical analysis is an ambitious, complex, and difficult undertaking, but as Marcuse discusses, it is very much necessary [2, 84].

Marcuse argues that a way to engage in such critical analysis and challenge our one-dimensional thought is by participating in artistic creativity that allows us to leave the reality that has been

defined by society [2, 84, 85]. Artistic creativity facilitates developing new designs that are not confined by the current reality of what is possible and allows us to consider designs we might have been blind to consider otherwise. Based on this, we believe there is value in engaging with workers in “creative artistic co-design sessions.” These sessions would allow workers to creatively define the type of digital labor platforms that they would like to see and how they would design to address invisible labor [109]. Similarly, we believe there is value in drawing on scholarship that has studied the link between fiction and design [27, 35, 79, 115]. Here we envision we could engage researchers, workers, platform owners, and practitioners to use fictional narratives to design “alternative realities” to contemporary digital labor platforms and tools [34, 80].

5.0.6 Limitations. The insights from our research are limited by the methodology and population we studied. Our study also focused on breadth instead of depth to start to shed needed light on the quantification of invisible labor in crowd work. Notice that we had to develop specific tools in order to do our field study, which is not simple. However, these types of studies are important, especially given the lack of transparency that MTurk or other crowdsourcing platforms provide around invisible labor. Upon publication, we will open-source our plugin and anonymous worker data so that the scientific community can conduct longitudinal studies around invisible labor, as well as study other principles surrounding invisible labor.

6 CONCLUSION

We developed a new computational tool to be able to quantify and study the invisible labor of crowd workers on MTurk. We have demonstrated that the invisible labor that workers do can take a toll on their wages. Particularly, we saw that if we consider the amount of time that crowd workers invest in invisible labor, their hourly wages go down to \$2.83 from \$3.76. We also identified that the two most time-consuming categories of invisible labor revolved around payments and hyper-vigilance. Additionally, our study identified that workers tended to overestimate the amount of invisible labor that they believed they did. Our results also suggest there is a wide range of dynamics that influence the amount of invisible labor that a particular worker conducts. These different dynamics deserve more investigation.

Finally, we hope that our plugin tool inspires the auditing of different digital labor platforms and helps to potentially generate a range of positive policy innovations in digital work. Our paper has provided much-needed light to the invisible labor of crowd workers.

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- **Nelson Eusebio**

The National Supermarket Association (NSA), representing over 600 independently owned grocery stores across New York City, submits this comment to express significant concerns with the Department's proposed rules relating to contracted delivery workers.

Independent supermarkets operate on extremely thin margins and are facing unprecedented financial pressure due to rising rents, increased operating costs, and growing competition from large national chains. In this environment, access to third-party delivery platforms has become essential. These services allow neighborhood grocers to reach seniors, people with disabilities, and customers in food deserts, while helping small businesses remain competitive with big box stores that have far greater resources and delivery infrastructure.

The proposed rules, as drafted, would substantially increase the cost of participating in these platforms. Any increase in platform fees or operational expenses will be passed directly onto small grocers and their customers. Experience from the 2021 restaurant delivery regulations demonstrates what happens under similar frameworks: significantly higher consumer prices, increased fees on small businesses, and reduced access to delivery services. In the grocery sector, where margins are even lower, the impact will be more severe.

Raising delivery-related costs will discourage customer use of these services, reduce sales for independent grocers, and widen the competitive gap between small neighborhood supermarkets and large national retailers. Ultimately, consumers will face higher grocery prices and fewer delivery options, while many independent stores will struggle without the revenue from these platforms.

For these reasons, NSA urges DCWP not to adopt the rules as currently written and instead consider alternative approaches that protect delivery workers without increasing costs for consumers or

undermining the viability of independent supermarkets. We remain committed to working with the Department to develop solutions that support workers while preserving affordable food access for New Yorkers.

Comment added November 26, 2025 12:33pm

- **Christopher Leon Johnson**

Hello, my name is Christopher, Leon Johnson and I'm showing opposition to this rules to amend it to where that people that do Instacart will deliver the workers that does Instacart will get paid minimum wage. I am against us rule because of the fact that this minimum wage rule that went to affect in 2023 with paying delivery workers, or for the workers help put the city in more danger when When it either be a delivery worker and a customer, including the member of the public. The minimum wage for the new workers or food delivery workers delivery workers helped the commissioner of the police department or NYPD, criminalize delivery workers on behalf of the organization that wants the bikes to be regulated. E bikes. This law will help Weaponized those organizations. To regulate E bikes. I am not against a living wage I am against the rule out of this rule. It doesn't matter if you pay a delivery worker 20 30 forty \$50 an hour if the apps are in position to retaliate for any petty reason to where at the delivery workers a force to break every rule in the book to make a delivery which puts the public in danger where that a delivery worker can be criminalized, including the fact of being deported. If they not post to be here, then the rollout is all wrong. the members of Instacart. Will be retaliated by Instacart like how Uber DoorDash and GrubHub are retaliating against them. I know that this law will be law. I am against the deactive unfair deactivations of the living workers, and the minimum wage in 2023 helped us skyrocket and this one will eventually help it more skyrocket. The city have to understand that this law will hurt everybody more than help everybody. There is a certain organization that So called fights on behalf of the delivery workers which is based in Brooklyn and it's

called "The workers justice project" and they are the reason that this is happening in the city. That organization blocks everybody that calls them out on what they're doing to the delivery worker. No Delivery worker wants a minimum wage in the city. The only people that want the minimum wage is the worker justice project. And there complacent gentrifier app workers that just do it because they see the side job direct the regular users of the app that I professional delivery workers that uses old school e bikes which are most the time. Dangerous and have like multiple batteries and they ethnicity are west African and Hispanic. They don't want the minimum wage. They don't want the minimum wage because of the fact that they know that once that happens the employers will retaliate by opening up more provisions to start using the apps, including E verify. On the same day of his hearing the city council will have a hearing about E-Verify employers to wait at the city wants to Ban ban E-Verify from being used with employers. The truth, a matter fact, is that very soon the same organization the worker justice project. Wants those same delivery workers to be employees if that city Council bill does not go through with banning, E-Verify and E-Verify be used for the delivery workers then it'll be a big disaster for the city for delivery delivery workers. Many workers lose their job. Many workers will be open up to deportation. Many workers don't have the skills to replace their employment opportunities to many of migrants here this is all they can do on the eighth of December, I will be speaking at the city Council hearing for immigration is speaking on behalf of making sure that E-Verify will not be used for the employers for the delivery for the worker workers.

I hope that the WJP does the same thing on that day, and submit a testimony, opposing, supporting the opposite to verify and supporting the bill for blocking E-Verify by employers in the city on behalf of the delivery workers. As I say it again, I rule I know it will be law. I am just here to this, so you just give the consequences of this bill. And I will submit this in a PDF version. Thank you.

Christopher Leon Johnson

Comment added November 29, 2025 2:40pm

- **Willian Medina**

It is essential for grocery delivery workers, including Instacart shoppers, to secure a minimum pay standard. This would be a critical step toward ensuring fair compensation—not only for the time we spend actively completing orders, but also for the many hours we remain connected and waiting in the streets for offers. All of this waiting time is part of our work and must be recognized.

In addition, having protections aligned with measures like Local Law 1332, which guards workers against unfair deactivations, is equally important. Too often, companies use unjust tactics to remove workers from their platforms, leaving us without income and without due process.

In summary, achieving a \$30 minimum hourly wage and strong protections against unfair terminations must be top priorities for all workers in this industry. These standards will help ensure stability, dignity, and fairness for the thousands of delivery workers who keep this system running every day.

Comment added December 2, 2025 12:15pm

- **Yadira Sahe**

"The most regrettable thing is knowing that workers remain connected for long hours, waiting for the application to give them just a couple of hours of work, and on other occasions, it only gives them half an hour. Meanwhile, they wait long hours outdoors, in the cold, in the heat, in the rain, or in the snow, only to work for half an hour. The minimum wage should be at least \$30 per hour and must include both the connected time and the active time so that the person has a way to survive in this expensive city. We know what the application will do after the minimum wage passes, and that is to deactivate many workers in retaliation for having won a minimum wage—whatever that wage may be.

We ask the pertinent agencies to align with Intro 1332 to provide protection against unfair deactivations to workers and prevent them from being punished for winning a vitally necessary right due to the hard and dangerous work they perform.

Comment added December 2, 2025 12:27pm

- **Mamadou Keita**

Establishing a guaranteed minimum wage for grocery delivery workers, including those on Instacart, is crucial to ensuring fair and dignified compensation. Our earnings must reflect not only the time spent completing deliveries, but also the significant amount of time we remain online, available, and waiting for orders—time that clearly represents active labor and commitment.

Equally important is the need for stronger protections, such as those outlined in Local Law 1332, which will help safeguard workers from unfair and arbitrary deactivations. Many companies rely on opaque and unjust practices to remove workers from their platforms, leaving families without income or recourse.

Ultimately, securing a \$30 hourly minimum pay and ensuring real protections against wrongful deactivation are fundamental priorities for delivery professionals across this industry. These measures are vital for building a safer, more stable, and more equitable future for all of us.

Comment added December 2, 2025 1:16pm

- **edgar**

la ley de pago minimo me parece muy bien ya que muchas veces instacard no es transparente con nuestros pagos ya nos roban los tips y nos bloquean y no nos dan razón el porque nos bloquean nuestras cuentas esperemos que pasen los del pago mínimo ya que va favorecer a muchos trabajadores de instacard muchas gracias

Comment added December 2, 2025 1:22pm

- **Roberto**

Apoyo completamente la implementación de un pago mínimo garantizado para los trabajadores de Instacart. Los shoppers realizan un trabajo esencial, enfrentándose a riesgos en las calles y costos de transporte, pero muchas veces sus ingresos dependen de pedidos variables o comisiones bajas. Establecer un pago mínimo asegura ingresos justos, estabilidad económica y dignidad laboral, al mismo tiempo que fomenta un servicio más seguro y sostenible para todos.

Comment added December 2, 2025 3:28pm

- **jaime**

El trabajo de los repartidores de Instacart no es opcional para nuestra economía: es esencial. Sin embargo, miles de ellos siguen trabajando sin garantías ni estabilidad. Un pago mínimo justo no es un privilegio, es una necesidad para que quienes abastecen hogares y comunidades puedan vivir con dignidad. Apoyar este pago significa reconocer su valor, su tiempo y su esfuerzo. ¡Los trabajadores merecen justicia económica ahora!

Comment added December 2, 2025 4:47pm

- **Yoehan Oh**

I, a Postdoctoral Associate studying the history of technology, information systems, digital platforms, and labor, supports extending New York City's delivery worker minimum pay standard to include app-based grocery delivery workers. I stand in solidarity with New York City's delivery and grocery workers and urges swift approval of this rule.

Comment added December 2, 2025 7:32pm

- **Tapos Chandras das**

It's essential to have a minimum pay law guaranteeing grocery delivery workers—like Instacart shoppers—at least \$30 per hour. This ensures fair compensation for the time, effort, and expenses we

invest. We also need strong protections against unfair deactivations, so that hardworking drivers aren't stripped of their income without due process or transparency."

Comment added December 3, 2025 1:49pm

- **Hossain shuvo**

A guaranteed \$30-per-hour minimum pay law is crucial for grocery delivery workers such as Instacart shoppers. It helps ensure our labor is valued and that we can earn a stable, livable income. We also need solid safeguards against unjust deactivations, so workers aren't removed from the platform without fairness, clarity, or a chance to respond."

Comment added December 3, 2025 1:51pm

- **Khurshid Alam**

"Establishing a \$30-per-hour minimum pay standard for grocery delivery workers, including Instacart shoppers, is vital to guarantee fair and reliable earnings for the work we perform. It's equally important to have protections against wrongful deactivations, so workers aren't unfairly cut off from their livelihood without proper review or justification."

Comment added December 3, 2025 1:54pm

- **Mamadou**

Implementing a local minimum-pay law of \$30 for grocery delivery is an important step toward ensuring fair compensation for gig workers, improving job stability, and reducing exploitation. It helps align pay with rising living costs and recognizes the essential role delivery workers play in the community—while also requiring thoughtful enforcement to ensure companies actually comply and workers receive the full benefit and uphold protections under Deactivation Law 1332 for food delivery drivers. These measures ensure drivers are

treated with dignity, given financial stability, and protected from unjust removal from platforms."

Comment added December 3, 2025 1:55pm

- **Nur hossain**

A \$30-per-hour minimum pay requirement is essential to ensure grocery delivery workers—like those on Instacart—are compensated fairly for their time and costs. We also need clear protections against arbitrary deactivations, so workers aren't suddenly denied income without a fair explanation or process."

Comment added December 3, 2025 1:57pm

- **Nur Hossain kiron**

My name is Nur hossain I am a delivery worker I'm writing ask for fair pay for workers like me, we need instacart and other delivery companies to pay more than 21.44 per hour and to pay us for all the time we are actively working making deliveries and waiting time, we also need the pay to be clear and transparent

Comment added December 3, 2025 2:04pm

- **Thierno**

Upholding local regulations that secure a \$30 minimum payment for grocery delivery workers, along with enforcing Deactivation Law 1332 for food delivery drivers, is crucial. These protections help ensure fair compensation, job security, and prevent drivers from being unfairly deactivated by delivery platforms."

Comment added December 3, 2025 2:22pm

- **tony**

Mi nombre es Antonio y soy trabajador de entregas. Quiero expresar la necesidad urgente de que quienes hacemos este trabajo recibamos un salario justo. Es indispensable que Instacart y otras plataformas paguen más de \$21.44 por hora y que ese pago cubra todo el tiempo

que estamos activos: tanto entregando como esperando pedidos. Además, el proceso de pago debe ser claro y transparente. Los repartidores trabajamos duro todos los días para sostener a nuestras familias y nuestras comunidades, pero a menudo enfrentamos castigos injustificados como desactivaciones o limitaciones de horas. Por eso la Intro 1332 es tan importante: nos protege y nos acerca a un ingreso digno. Les pido que apoyen esta medida. Gracias.

Comment added December 3, 2025 2:32pm

- **Amadou**

Establishing a local \$30 minimum-pay requirement for grocery delivery workers is a key move toward guaranteeing fair wages, strengthening job security, and preventing the exploitation of gig labor. This standard better reflects growing living expenses and acknowledges the vital contribution delivery workers make to their communities. Effective oversight is also necessary to ensure companies follow the rules and that workers receive the compensation they are entitled to. In addition, enforcing Deactivation Law 1332 for food delivery drivers is essential to safeguard workers' rights, ensure financial stability, and protect them from unfair or arbitrary deactivation by delivery platforms."

Comment added December 3, 2025 2:50pm

- **Braulio Martinez**

My name is Braulio, and I have been delivering food for eight years. My body hurts from the hours on the bike, often waiting in the street for work the app promises but doesn't give. We must have fair pay. We need at least \$30 per hour, and this must count the entire time I am connected and waiting, not just the few minutes I am moving. The companies threaten us; they can cut our accounts just for speaking up. Intro 1332 is the shield we need. Please, support this law to protect the older workers like me.

Comment added December 3, 2025 3:02pm

- **Angel Garcia**

My name is Angel. I am a professional cook with 15 years of experience, but currently, delivery work is my reality here in New York. It is deeply frustrating to apply my skills and professionalism to a job where the platform systematically devalues my time. We are required to remain connected for over 60% of our shift to satisfy demand fluctuations, yet we are paid only for the 40% that is "active." This mandatory availability deserves compensation. We need a minimum wage of \$30 per hour or more that absolutely includes all connected time. When this essential reform passes, we fully anticipate the corporate response will be malicious—the mass deactivation of accounts. Intro 1332 is not merely a wage bill; it is the vital safeguard that prevents the economic punishment of workers who secure their fundamental rights. I urge you to support Intro 1332 completely.

Comment added December 3, 2025 3:35pm

- **Tapos Chandra das**

Pleas give my id

Comment added December 3, 2025 3:35pm

- **Luis Montero P.**

My English is not the best, but I know what is fair. I wait many hours, outside, waiting for the phone to give me work. It is too cold sometimes. My time is worth something. I need \$30 an hour, all the time I am connected, to pay rent in New York. If the company turns off my account (deactivates me) because of the new rules, I lose everything. We need the city to stop the companies from doing this. Please pass Intro 1332 to protect us from bad companies.

Comment added December 3, 2025 3:50pm

- **celso**

Apoyo totalmente la implementación de un pago mínimo justo para los trabajadores de Instacart. Los repartidores realizan un trabajo esencial, enfrentándose a riesgos diarios y costos de transporte, pero muchas veces no reciben ingresos suficientes por su esfuerzo. Establecer un pago mínimo garantizaría ingresos dignos, estabilidad económica y un trato justo, reconociendo la importancia de quienes mantienen abastecidas nuestras comunidades.

Comment added December 3, 2025 3:51pm

- **fernando**

Los trabajadores de Instacart son la columna vertebral de la entrega de alimentos en nuestra ciudad. Sin embargo, muchos ganan muy poco por horas de trabajo largas y exigentes. Un pago mínimo garantizado no solo reconoce su esfuerzo, sino que les permite cubrir sus gastos, cuidar a sus familias y trabajar con dignidad. Todos merecemos que el trabajo esencial sea justamente remunerado.

Comment added December 3, 2025 3:52pm

- **Fausto Mendez**

We stand out here, freezing our butts off, while the app acts like a vending machine that's almost always empty. We waste hours of our lives—unpaid—just so the app looks available to customers. Half an hour of work for two hours of waiting? That's not a business model; it's a scam. Give us the \$30/hour minimum wage, including the time we are tethered to the app. And let's be real—the minute that passes, they'll fire thousands of us just to make a point. Intro 1332 needs to be supported specifically to stop the inevitable mass deactivations. Don't let them punish us for wanting to live.

Comment added December 3, 2025 3:58pm

- **Jose Yos.**

My name is Jose Yos, a 39-year-old delivery worker with 6 years of experience. I speak Spanish and basic English. I am the only provider

for my two children. I am writing to ask for fair pay for workers like me. We need Instacart and other delivery companies to pay more than \$21.44 per hour and compensate all the time we are actively working—making deliveries and waiting. We work hard, but the company sometimes punishes us by deactivating accounts or limiting hours. That's why Intro 1332 is so important—it will protect families like mine and ensure we can earn a living wage. Please support us.

Español:

Mi nombre es Jose Yos, soy un repartidor de 39 años con 6 años de experiencia. Hablo español y un poco de inglés. Soy el único proveedor de mis dos hijos. Escribo para pedir un pago justo para trabajadores como yo. Necesitamos que Instacart y otras compañías paguen más de \$21.44 por hora y nos compensen por todo el tiempo activo—entregando y esperando. Trabajamos duro, pero la compañía a veces nos castiga desactivando cuentas o limitando horas. Por eso el Intro 1332 es tan importante—protegerá familias como la mía y garantizará que podamos ganar un salario digno. Por favor apóyenos.

Comment added December 3, 2025 4:04pm

- **C. James Robert von Scholz SC**

BY WEBSITE SUBMISSION / NO HARDCOPY SENT:

<https://www.rules.cityofnewyork.us/rule/rules-relating-to-contracted-delivery-workers>

New York City Department of Consumer and Worker Protection
Attn: Office of Legal Counsel
42 Broadway, 8th Floor
New York, NY 10004

RE: Proposed amendment(s) to Subchapter H of Chapter 7 of Title 6 of the Rules of the City of New York to implement Local Laws 95, 107, 108, 113, 123, and 124 of 2025

To Whom it May Concern:

I submit this comment in my capacity as a registered representative before the Office of Administrative Trials and Hearings (OATH) which includes labor compliance, consumer protection, and administrative enforcement before multiple New York City agencies.

The proposed rules present significant implications for restaurants, contracted workers, and consumers.

A comprehensive evaluation of their impacts is essential to ensure balanced outcomes.

Impacts on Restaurants

Benefits

Regulatory clarity regarding relationships with third-party delivery platforms; Defined pay standards, tipping disclosures, and platform reporting; obligations that support predictable business planning; Improved public perception through partnerships with compliant platforms.

Liabilities

Potential fee increases as platforms distribute costs associated with compliance obligations; Limited ability of small independent restaurants to absorb increased operational costs; Possible reductions in delivery coverage, hours, or long-distance routes due to platform adjustments.

Impacts on Contracted Workers

Benefits

Enforceable minimum pay protections for trip time and on-call time; Enhanced transparency in pay statements and tipping transfers; Defined rights regarding distance limits, bridge and tunnel preferences, and retaliation protection; Strengthened worker safety

through required equipment provisions and detailed platform recordkeeping.

Liabilities

Potential limitations on worker log-ins or shift access due to platform cost-management strategies; Increased acceptance metrics or batch-assignment rules that may pressure workers; Reduced earnings predictability if shift availability becomes constrained.

Impacts on Consumers

Benefits

Clearer disclosure of fees, gratuities, and delivery charges; Improved service quality, safer handling practices, and consistent delivery times; Strengthened consumer confidence in the delivery marketplace.

Liabilities

Higher delivery costs as platforms and restaurants adjust to increased operational obligations; Narrowed delivery availability in certain neighborhoods or time periods.

Administrative and Enforcement Considerations

Consistent guidance for platforms, restaurants, and workers is critical. Standardized record formats will support enforcement and efficient adjudication. Clear rules for platform deactivation, gating practices, and complaint review procedures are necessary for fair enforcement.

Recommendation

A structured public-private inquiry should be conducted before adopting the rules.

Stakeholder representation should include agency staff, worker & restaurant advocacy groups, restaurants, delivery platforms, consumer organizations, and independent researchers.

The inquiry should evaluate:

1. Projected delivery coverage adjustments by zone and time.
2. Expected fee pass-through patterns to restaurants and consumers.
3. Anticipated worker access constraints, including log-in gating and shift availability.
4. Tipping transfer practices and compliance burdens.
5. Administrative burdens for small restaurants.
6. Impacts on consumer pricing, satisfaction, and complaint trends.
7. Baseline operational data from platforms to support enforcement.

This review should establish measurable benchmarks and operational safeguards to protect all parties.

These benchmarks should be in place before finalizing the rules to ensure a calibrated regulatory structure supported by verified data.

Conclusion

The proposed rules provide meaningful worker protections and improve transparency for consumers. However, their adoption should be contingent upon: Completion and implementation of the recommended public-private review mechanism; and the establishment of defined performance benchmarks that protect consumers, contracted workers, and restaurants.

Thank you for the opportunity to comment.

Respectfully submitted,

/s/ C. James Robert von Scholz
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Comment attachment

ContractedWorkers-12042025.pdf

Comment added December 4, 2025 10:08am



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Thursday, December 4, 2025

BY WEBSITE SUBMISSION / NO HARDCOPY SENT:

<https://www.rules.cityofnewyork.us/rule/rules-relating-to-contracted-delivery-workers>

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Impacts on Restaurants

1. Benefits

- a. Regulatory clarity regarding relationships with third-party delivery platforms;
- b. Defined pay standards, tipping disclosures, and platform reporting;
- c. obligations that support predictable business planning;

B I R C H H I L L C H A M B E R S

115 Forest Avenue, Unit 61, Locust Valley, NY 11560

- d. Improved public perception through partnerships with compliant platforms.

2. Liabilities

- a. Potential fee increases as platforms distribute costs associated with compliance obligations;
- b. Limited ability of small independent restaurants to absorb increased operational costs;
- c. Possible reductions in delivery coverage, hours, or long-distance routes due to platform adjustments.

Impacts on Contracted Workers

1. Benefits

- a. Enforceable minimum pay protections for trip time and on-call time;
- b. Enhanced transparency in pay statements and tipping transfers;
- c. Defined rights regarding distance limits, bridge and tunnel preferences, and retaliation protection;
- d. Strengthened worker safety through required equipment provisions and detailed platform recordkeeping.

2. Liabilities

- a. Potential limitations on worker log-ins or shift access due to platform cost-management strategies;
- b. Increased acceptance metrics or batch-assignment rules that may pressure workers;
- c. Reduced earnings predictability if shift availability becomes constrained.

Impacts on Consumers

1. Benefits

- a. Clearer disclosure of fees, gratuities, and delivery charges;
- b. Improved service quality, safer handling practices, and consistent delivery times;

B I R C H H I L L C H A M B E R S

115 Forest Avenue, Unit 61, Locust Valley, NY 11560

- c. Strengthened consumer confidence in the delivery marketplace.

2. Liabilities

- a. Higher delivery costs as platforms and restaurants adjust to increased operational obligations;
- b. Narrowed delivery availability in certain neighborhoods or time periods.

Administrative and Enforcement Considerations

Consistent guidance for platforms, restaurants, and workers is critical. Standardized record formats will support enforcement and efficient adjudication. Clear rules for platform deactivation, gating practices, and complaint review procedures are necessary for fair enforcement.

Recommendation

A structured public-private inquiry should be conducted before adopting the rules.

Stakeholder representation should include agency staff, worker & restaurant advocacy groups, restaurants, delivery platforms, consumer organizations, and independent researchers.

The inquiry should evaluate:

1. Projected delivery coverage adjustments by zone and time.
2. Expected fee pass-through patterns to restaurants and consumers.
3. Anticipated worker access constraints, including log-in gating and shift availability.
4. Tipping transfer practices and compliance burdens.
5. Administrative burdens for small restaurants.
6. Impacts on consumer pricing, satisfaction, and complaint trends.
7. Baseline operational data from platforms to support enforcement.

This review should establish measurable benchmarks and operational safeguards to protect all parties.

These benchmarks should be in place before finalizing the rules to ensure a calibrated regulatory structure supported by verified data.

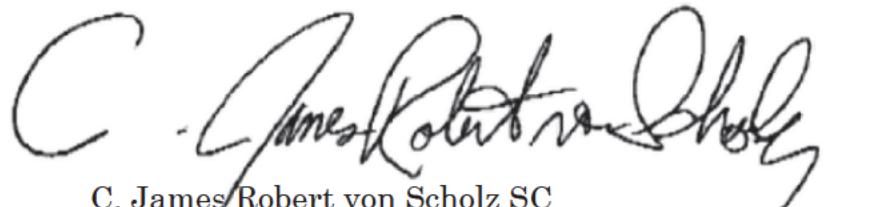
Conclusion

The proposed rules provide meaningful worker protections and improve transparency for consumers. However, their adoption should be contingent upon:

1. Completion and implementation of the recommended public-private review mechanism.
2. Establishment of defined performance benchmarks that protect consumers, contracted workers, and restaurants.

Thank you for the opportunity to comment.

Respectfully submitted,



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cc : File

- **Alpha oumar**

I also need 30 \$ par hours

Comment added December 4, 2025 3:34pm

- **celso**

Apoyo totalmente la implementación de un pago mínimo justo para los trabajadores de Instacart. Los repartidores realizan un trabajo esencial todos los días, enfrentando riesgos y costos propios, y merecen recibir un salario digno que reconozca su esfuerzo y tiempo. Un pago mínimo garantiza estabilidad económica, justicia laboral y respeto por quienes sostienen este servicio fundamental.

Comment added December 4, 2025 4:47pm

- **MD JAHIDUL ISLAM NAIM**

I also want 30\$ per hour

Comment added December 4, 2025 4:48pm

- **abbad**

Cada día los repartidores cargamos productos pesados, recorremos largas distancias y sacrificamos tiempo con nuestras familias. Instacart debe pagar un salario mínimo real que refleje el valor de nuestro trabajo. La ciudad debe apoyar a quienes la mantienen en movimiento.

Comment added December 4, 2025 4:48pm

- **abel**

Soy trabajador de Instacart y sé lo que significa esperar horas sin pago, caminar bajo lluvia o nieve y aun así recibir ingresos insuficientes. Por eso apoyo un pago mínimo garantizado: es necesario para vivir con dignidad.

Comment added December 4, 2025 4:51pm

- **alfonso**

Apoyo totalmente la implementación de un pago mínimo justo para los trabajadores de Instacart. Los repartidores desempeñan un trabajo esencial, llevando alimentos y productos a miles de hogares todos los días, enfrentándose a largas jornadas, condiciones climáticas difíciles y gastos propios como transporte y mantenimiento de sus vehículos o bicicletas. Sin embargo, muchos de nosotros recibimos pagos variables e insuficientes que no reflejan el esfuerzo ni las horas trabajadas, incluyendo el tiempo que pasamos esperando pedidos. Un pago mínimo garantizado no solo asegura que los trabajadores reciban ingresos dignos, sino que también brinda estabilidad económica, reduce la incertidumbre diaria y protege a quienes hacen posible este servicio fundamental. Además, promueve la transparencia y la equidad en la industria de entregas, evitando prácticas injustas como desactivaciones arbitrarias o reducción de horas sin justificación.

Es crucial que Instacart y otras plataformas reconozcan el valor real de los repartidores y se comprometan con salarios justos y condiciones de trabajo respetuosas. Apoyar un pago mínimo no es un lujo, es una medida necesaria para garantizar justicia, dignidad y seguridad para todos los trabajadores de entregas.

Comment added December 4, 2025 4:53pm

- **Mohammad Tajul Islam**

I also need 30\$ par hours

Comment added December 4, 2025 4:53pm

- **alfonso**

Como trabajador de entregas de Instacart, veo cada día lo duro que es este trabajo: cargar bolsas pesadas, recorrer largas distancias, enfrentar lluvia, frío o calor, y aun así muchas veces no recibir un pago justo por todo el tiempo que dedicamos. No solo estamos entregando pedidos, estamos sosteniendo la vida diaria de miles de familias.

Por eso es fundamental que exista un pago mínimo garantizado. No se trata solo de dinero, se trata de dignidad, justicia y reconocimiento. Todos los trabajadores merecemos seguridad económica y saber que nuestro esfuerzo es valorado. Apoyar este pago mínimo es un paso necesario para crear un sistema de entregas más justo y humano.

Comment added December 4, 2025 4:54pm

- **bazan**

Los repartidores de Instacart hacen posible que muchas personas reciban sus alimentos y productos sin salir de casa, especialmente en tiempos difíciles. Sin embargo, muchos trabajamos largas horas sin un ingreso estable, y a menudo no se nos paga por todo el tiempo que estamos activos. Implementar un pago mínimo garantizado no solo asegura ingresos justos, sino que también protege nuestra seguridad y bienestar. Es hora de que las plataformas de entrega reconozcan el verdadero valor de nuestro trabajo y nos traten con justicia.

Si quieres, puedo hacer una serie de 3-5 comentarios distintos más, cada uno con un ángulo único: emocional, técnico, social, de derechos laborales y de impacto comunitario. Esto es útil si quieres publicarlos o enviarlos a legisladores. ¿Quieres que haga eso?

Comment added December 4, 2025 4:55pm

- **alfredo**

Cada día, los repartidores de Instacart recorremos la ciudad bajo todo tipo de condiciones: lluvia, frío, calor, tráfico y largas caminatas. No solo entregamos alimentos y productos, también garantizamos que las familias puedan recibir lo que necesitan sin salir de casa. Sin embargo, muchas veces nuestro esfuerzo no se refleja en el pago que recibimos. El dinero que ganamos a menudo no cubre las horas reales de trabajo, incluyendo el tiempo que pasamos esperando pedidos o moviéndonos entre ubicaciones.

Un pago mínimo garantizado no es solo un número en un recibo; es

reconocimiento, respeto y seguridad para quienes hacemos este trabajo esencial. Nos permite cubrir nuestros gastos, cuidar de nuestras familias y trabajar sin la constante incertidumbre de no saber si nuestras horas o esfuerzo serán compensados. Además, asegura que la industria de entregas funcione de manera más justa, transparente y sostenible.

Apoyar un pago mínimo para los trabajadores de Instacart significa reconocer que cada entrega, cada hora de espera y cada esfuerzo cuenta. Es hora de que se valore y respete nuestro trabajo, y que quienes dependemos de esta labor tengamos la estabilidad y dignidad que merecemos.

Comment added December 4, 2025 4:57pm

- **Karim**

I'm a delivery worker, and I'm reaching out to ask for fair compensation for people in my position. App-based delivery companies should pay workers at least \$30 an hour and make sure we're paid for all the time we spend actively delivering as well as the time we spend waiting. Our pay also needs to be clear and transparent. We work extremely hard, and we deserve protections—especially against unfair deactivations that can threaten our livelihoods.

Intro 1332 is critical for us. It will help ensure that we can earn a real living wage. Please stand with us and support this measure. Thank you.

Comment added December 4, 2025 4:59pm

- **alvaro**

Apoyo totalmente el establecimiento de un pago mínimo justo para los trabajadores de Instacart. Los repartidores realizan un trabajo esencial todos los días, enfrentándose a largas jornadas, condiciones climáticas difíciles y gastos propios, pero muchas veces no reciben un pago que refleje el tiempo y esfuerzo invertidos. Garantizar un pago

mínimo significa asegurar dignidad, estabilidad económica y justicia laboral, además de fomentar transparencia y respeto hacia quienes hacen posible este servicio

Comment added December 4, 2025 4:59pm

- **ambrosio**

I fully support the implementation of a fair minimum wage for Instacart workers. Delivery drivers perform essential work every day, facing long hours, difficult weather conditions, and out-of-pocket expenses, yet often they are not paid fairly for all the time and effort they put in. Many workers spend hours waiting for orders or traveling between locations without proper compensation.

A guaranteed minimum wage is not just about money—it is about dignity, stability, and respect. It ensures that workers can cover their living expenses, support their families, and work without the constant uncertainty of whether their time and effort will be valued. It also promotes transparency and fairness within the delivery industry, creating a more sustainable system for both workers and customers. Supporting a minimum wage for Instacart workers means recognizing that every delivery, every minute of work, and every effort matters. It is time for these essential workers to receive the respect and fair pay they deserve.

Comment added December 4, 2025 5:01pm

- **galicia**

As an Instacart worker, I know firsthand how demanding this job can be. We navigate the city in all kinds of weather, carry heavy groceries, and spend hours on the road to make sure families have what they need. Yet, many of us are not paid fairly for all the time we work, including waiting for orders or traveling between stops.

A minimum guaranteed wage is essential. It's not just about fair pay—it's about recognizing our effort, respecting our time, and ensuring we can support ourselves and our families. Instacart workers are providing an essential service, and it's time that our work is valued

properly. Fair compensation will provide stability, security, and dignity for all workers in this industry.

Comment added December 4, 2025 5:02pm

- **Aziz**

I am a delivery worker, and I'm writing to advocate for fair wages for people in this industry. Companies that rely on delivery workers should provide a minimum of \$30 per hour and compensate us for every moment we spend on the job—both during active deliveries and while waiting for orders. We also need clear, honest pay information. We put in a lot of hard work, and we deserve real protection from unfair deactivations that can jeopardize our ability to work.

Intro 1332 is essential for workers like me. It will help guarantee that we can earn a sustainable income. Please support it. Thank you.

Comment added December 4, 2025 5:02pm

- **Pedro Saguach**

My name is Pedro Saguach, a 52-year-old father with 12 years of experience. I speak Spanish and English. I am the only income in my household. I fear retaliation if I speak up. Intro 1332 is necessary to protect workers and families from unfair treatment.

Español:

Mi nombre es Pedro Saguach, padre de 52 años con 12 años de experiencia. Hablo español e inglés. Soy el único ingreso de mi hogar y temo represalias si hablo. El Intro 1332 es necesario para proteger a trabajadores y familias de un trato injusto.

Comment added December 4, 2025 5:21pm

- **David Serpas**

Establishing a \$30 minimum hourly pay for grocery apps like Instacart and Gopuff is essential, especially given the heavy orders we handle.

Workers should also be paid for wait time and be protected from unfair deactivations under Law 1332.

Comment added December 4, 2025 8:12pm

- **Luis Munoz**

Grocery delivery workers need a \$30 hourly minimum to reflect the demanding, high-volume orders we complete. Fair pay for wait and active time, along with 1332 protections against unjust deactivations, will help stop worker exploitation.

Comment added December 4, 2025 8:22pm

- **Lucas morales**

A fair \$30 minimum wage for grocery app workers is overdue. Considering the heavy workloads, plus the need to be paid for wait/active time and protected by 1332, these standards would finally hold platforms accountable.

Comment added December 4, 2025 8:26pm

- **Eduardo Alva**

Delivery apps must adopt a \$30 minimum wage for grocery workers, pay for waiting and active time, and respect Law 1332 to prevent unfair deactivations. These protections would curb ongoing exploitation.

Comment added December 4, 2025 8:29pm

- **Leonardo M**

Given the physical demands and high volume of items we deliver, grocery app workers deserve a \$30 minimum hourly rate, payment for all work time, and strong 1332 protections against unjust deactivations.

Comment added December 4, 2025 8:33pm

- **Fidel Vazquez**

A \$30 minimum hourly pay, compensation for wait and active time, and 1332 safeguards are necessary to ensure grocery app workers are treated fairly and not exploited by these platforms.

For Instacart, Gopuff, and similar apps,

Comment added December 4, 2025 8:35pm

- **William L**

or Instacart, Gopuff, and similar apps, implementing a \$30 minimum wage plus pay for waiting and working time—along with 1332 protections—would give workers the fairness and security they currently lack.

Comment added December 4, 2025 9:00pm

- **Ruben Sosa**

Grocery delivery jobs require heavy labor and long hours. A \$30 minimum wage, payment for wait/active time, and 1332 protections would finally give workers a fair and safe environment

Comment added December 4, 2025 9:06pm

- **Mamadou Keita**

The industry needs reforms: a \$30 minimum hourly rate, paid wait and active time, and 1332 protections to stop unjust deactivations. These steps would prevent apps from exploiting workers.

am a former Instacart shopper whose account was unjustly deactivated. This sudden deactivation has had severe negative consequences for me and my family, affecting our financial stability and overall well-being.

For this reason, it is urgent to advance the minimum pay and deactivation protections outlined in Local Law 1332. These safeguards are essential for delivery workers in New York City, ensuring fair compensation, due process, and protection from arbitrary

deactivations.

Passing this law is vital to guarantee that workers like me—who rely on these platforms to support our families—are treated with fairness, dignity, and economic security.

Comment added December 4, 2025 9:18pm

- **Luis Panora**

Workers delivering heavy, high-volume grocery orders deserve a \$30 minimum wage and compensation for all working time. Combined with 1332 protections, this would help end unfair treatment in the apps. because the companies they don't recognize as workers, so we need more protections not deactivations.

Comment added December 4, 2025 9:21pm

- **Carmelo Perez**

A \$30 minimum wage and pay for wait/active time are critical for grocery app workers. Ensuring enforcement of Law 1332 will protect us from unfair deactivations and exploitation.

Comment added December 4, 2025 9:26pm

- **Yacouba Kanambaye**

By establishing a \$30 minimum hourly pay, ensuring workers are compensated for every minute worked, and enforcing the protections outlined in Local Law 1332, we can demand fair treatment and prevent the ongoing exploitation in grocery delivery apps. Implementing these measures is crucial not only to safeguard workers' economic stability but also to create a more transparent, accountable, and equitable delivery industry in New York City. Establishing these standards sets a precedent that prioritizes dignity, fairness, and respect for all delivery workers.

Comment added December 4, 2025 9:33pm

- **My name Is yacouba**

Establishing a guaranteed minimum wage for grocery delivery workers, including those on Instacart, is crucial to ensuring fair and dignified compensation. Our earnings must reflect not only the time spent completing deliveries, but also the significant amount of time we remain online, available, and waiting for orders—time that clearly represents active labor and commitment.

Equally important is the need for stronger protections, such as those outlined in Local Law 1332, which will help safeguard workers from unfair and arbitrary deactivations. Many companies rely on opaque and unjust practices to remove workers from their platforms, leaving families without income or recourse.

Ultimately, securing a \$30 hourly minimum pay and ensuring real protections against wrongful deactivation are fundamental priorities for delivery professionals across this industry. These measures are vital for building a safer, more stable, and more equitable future for all of us.

Comment added December 4, 2025 9:51pm

- **Abimael cum.**

My name is Abimael cum. a delivery worker with 3 years of experience. I speak Creole and English, and I work every day to support my family. I'm asking for fair pay between \$21.44 and \$30 per hour so that I can cover rent, food, and childcare. Companies sometimes deactivate workers unfairly, and I'm afraid of losing the only income my family depends on. Intro 1332 is necessary to protect us and ensure transparency in pay. Please support us. Thank you.

Español:

Mi nombre es Abimael cum. soy un trabajador de entregas con 3 años de experiencia. Hablo criollo e inglés, y trabajo todos los días para mantener a mi familia. Pido un pago justo entre \$21.44 y \$30 por hora para poder cubrir renta, comida y cuidado infantil. Las compañías a veces desactivan a los trabajadores injustamente, y temo perder el único ingreso del que depende mi familia. La Intro 1332 es

necesaria para protegernos y asegurar transparencia en el pago. Por favor apóyennos. Gracias.

Comment added December 4, 2025 11:39pm

- **Wilfred Cum**

My name is Wilfred Cum and I am a delivery worker with 6 years of experience. My English is limited, so this job is one of the few opportunities I have to support my elderly parents. I am requesting pay between \$21.44 and \$30 per hour, including waiting time, because every dollar matters to my family. Companies sometimes deactivate workers who don't fully understand their policies, and that worries me. Intro 1332 is important because it protects vulnerable workers like me. Please support it. Thank you.

Español:

Mi nombre es Wilfred Cum, y soy un trabajador de entregas con 6 años de experiencia. Mi inglés es limitado, así que este trabajo es una de las pocas oportunidades que tengo para sostener a mis padres mayores. Pido un pago entre \$21.44 y \$30 por hora, incluyendo el tiempo de espera, porque cada dólar cuenta para mi familia. Las compañías a veces desactivan a trabajadores que no entienden completamente sus políticas, y eso me preocupa. La Intro 1332 es importante porque protege a trabajadores vulnerables como yo. Por favor apóyela. Gracias.

Comment added December 4, 2025 11:44pm

- **Zulma Funez**

My name is Zulma Funez, delivery worker with 10 years of experience. I am a single mother and the only provider for my household. I request fair pay between \$21.44 and \$30 per hour, including waiting time, because this job is my family's survival. Companies sometimes change our schedules or threaten deactivation, and that creates constant fear. Intro 1332 will help guarantee that workers like me can

work without retaliation and with transparent pay. Please support it. Thank you.

Español:

Mi nombre es Zulma Funez, soy una trabajadora de entregas con 10 años de experiencia. Soy madre soltera y el único sustento de mi hogar. Solicito un pago justo entre \$21.44 y \$30 por hora, incluyendo tiempo de espera, porque este trabajo es la supervivencia de mi familia. Las compañías a veces cambian nuestros horarios o amenazan con desactivarnos, y eso crea un miedo constante. La Intro 1332 ayudará a garantizar que trabajadores como yo podamos trabajar sin represalias y con pago transparente. Por favor apóyela. Gracias.

Comment added December 4, 2025 11:47pm

- **Pedro Bixcul**

My name is Pedro Bixcul, a delivery worker with 3 years of experience. I speak Creole and English, and I work every day to support my family. I'm asking for fair pay between \$21.44 and \$30 per hour so that I can cover rent, food, and childcare. Companies sometimes deactivate workers unfairly, and I'm afraid of losing the only income my family depends on. Intro 1332 is necessary to protect us and ensure transparency in pay. Please support us. Thank you.

Mi nombre es Pedro Bixcul, soy un trabajador de entregas con 3 años de experiencia. Hablo criollo e inglés, y trabajo todos los días para mantener a mi familia. Pido un pago justo entre \$21.44 y \$30 por hora para poder cubrir renta, comida y cuidado infantil. Las compañías a veces desactivan a los trabajadores injustamente, y temo perder el único ingreso del que depende mi familia. La Intro 1332 es necesaria para protegernos y asegurar transparencia en el pago. Por favor apóyennos. Gracias.

Comment added December 4, 2025 11:52pm

- **Oscar Yos**

My name is Oscar Yos, and I am delivery worker with 5 years of experience. I speak both English and Spanish, and I work long hours to support my two children. I am requesting fair pay between \$21.44 and \$30 per hour, because our work—both delivering and waiting—is real labor. Sometimes companies limit my hours without warning, and that puts my family at risk. Intro 1332 is essential because it gives us protections we currently don't have. Please support this bill. Thank you.

Español:

Mi nombre es Oscar Yos, y soy un trabajador de entregas con 5 años de experiencia. Hablo inglés y español, y trabajo largas horas para mantener a mis dos hijos. Solicito un pago justo entre \$21.44 y \$30 por hora, porque nuestro trabajo—tanto entregar como esperar—es labor real. A veces las compañías me limitan las horas sin aviso, y eso pone a mi familia en riesgo. La Intro 1332 es esencial porque nos da protecciones que hoy no tenemos. Por favor apoyen este proyecto. Gracias.

Comment added December 5, 2025 12:01am

- **Marcy Sir**

My name is Marcy Sir. I'm 28, and the only provider for my home. Delivery work is my full-time job, and I deserve to be paid for every minute I work—driving, delivering, and waiting. Intro 1332 ensures workers like me can keep working without fear of sudden deactivation. Please help us get fair pay. Thank you.

Español:

Mi nombre es Marcy Sir. Tengo 28 años, y soy la única sustento de mi hogar. El trabajo de entregas es mi empleo principal, y merezco que me paguen por cada minuto que trabajo—manejando, entregando y esperando.

Intro 1332 garantiza que trabajadores como yo podamos seguir trabajando sin miedo a desactivaciones repentinas.
Por favor ayúdenos a recibir un pago justo. Gracias.

Comment added December 5, 2025 12:52am

- **Jose Lino**

My name is Jose Lino, and I am a delivery worker. I am writing to ask for fair pay for workers like me. We need Instacart and other delivery companies to pay more than \$21.44 per hour and to pay us for all the time we are actively working—making deliveries and waiting time. We also need the pay to be clear and transparent.

As a 35-year-old father with 8 years in deliveries, every hour counts. Sometimes they limit my hours without explanation, and it puts my family at risk. That's why Intro 1332 is essential—it protects workers like me.

Please support us. Thank you.

Comment added December 5, 2025 12:57am

- **Juan evangelista**

I strongly support the passage of a fair minimum pay law for Instacart workers. Our work keeps an essential service running: we use our own vehicles, pay for gas, take on risks, and ensure that thousands of families receive their groceries. We should earn at least \$30 per active hour, and time spent connected and available should also be compensated, as being ready for orders is a key part of the job that keeps the platform functioning.

It is also important to remember that we are independent workers, so companies should not impose mandatory schedules or restrictive rules. As independent contractors, we deserve true flexibility and fair compensation.

For these reasons, I fully support Intro 1332, as it represents a crucial step toward passing a minimum pay law that guarantees dignity, respect, and economic justice for those of us who keep Instacart running every day.

Comment added December 5, 2025 11:13am

- **BASSOLE**

Setting a local \$30-an-hour pay standard for grocery delivery workers is an important step toward ensuring fair compensation, improving job stability, and preventing the mistreatment of people working in the gig economy. This level of pay recognizes rising costs of living and the essential role delivery workers play in keeping their communities running. Strong oversight is also crucial so that companies follow the rules and workers actually receive what they've earned.

Likewise, enforcing Deactivation Law 1332 for food delivery workers is vital. It provides real protection for workers' rights, helps maintain financial security, and ensures that drivers are not removed from platforms without a fair and justified process.

Comment added December 5, 2025 11:14am

- **Mohammad Ozi Ullah**

"As someone juggling school and shifts, \$21.44/hr isn't enough anymore. We're asking for \$30/hr for Instacart, and I really need my INTR 1332 approved."

Comment added December 5, 2025 11:15am

- **Md Riyaj Uddin**

"As a newcomer trying to build a life here, surviving on \$21.44/hr is hard. We want \$30/hr, and I need my INTR 1332 passed urgently."

Comment added December 5, 2025 11:17am

- **Mohammad Riaz**

"Workers deserve fair compensation. \$21.44/hr must rise to \$30/hr. And workers like me need timely approval of INTR 1332."

Comment added December 5, 2025 11:18am

- **Tapsoba**

Implementing a \$30 local minimum pay for grocery delivery workers is an essential step toward ensuring equitable compensation, reinforcing employment stability, and curbing the exploitation often seen in gig work. This pay level aligns with rising living costs and honors the important service workers provide. Strong regulatory oversight is equally crucial to guarantee compliance and proper payment. Likewise, enforcing Deactivation Law 1332 is critical to protect workers' rights and shield drivers from unjust or unwarranted deactivations.

Comment added December 5, 2025 11:19am

- **Riyajul islam**

"We're still getting \$21.44/hr but we're hoping for \$30 now. Also, We ask the pertinent agencies to align with Intro 1332 to provide protection against unfair deactivations to workers and prevent them from being punished for winning a vitally necessary right due to the hard and dangerous work they perform.

Comment added December 5, 2025 11:21am

- **manolo**

I fully support a fair minimum pay for Instacart workers. Our work is essential: we use our own vehicles, pay for gas, take on risks, and keep the service running for thousands of families. We should earn at least \$30 per active hour, and time spent connected and available should also be paid.

As independent workers, companies should not take away our flexibility or impose strict schedules. Additionally, tips should never be taken away, as they are part of our fair compensation for the effort and service we provide. A fair minimum pay law ensures dignity, respect, and proper recognition for the workers who keep Instacart running every day.

Comment added December 5, 2025 11:25am

- **Omar Abdul Ahad**

Hourly pay is \$21.44 at the moment. We are requesting \$30/hr for Instacart,

Intro 1332 is critical for us. It will help ensure that we can earn a real living wage. Please stand with us and support this measure. Thank you.

Comment added December 5, 2025 11:27am

- **Aboubakar**

Setting a \$30 minimum rate for grocery delivery workers will help make pay fair, improve job security, and stop gig workers from being taken advantage of. This rate matches today's cost of living and recognizes the important role we play. Clear enforcement is needed so companies actually follow the rules. On top of that, Deactivation Law 1332 is necessary to protect drivers' rights and prevent unfair removal from delivery apps.

Comment added December 5, 2025 11:30am

- **fernando melo**

Soy Fernando Melo y he trabajado con Instacart. Apoyo completamente la aprobación de una ley de pago mínimo justo para los trabajadores de plataformas como Instacart, porque nuestro trabajo es esencial y muchas veces no se reconoce adecuadamente. Todos los días usamos nuestros propios vehículos, pagamos gasolina, asumimos riesgos en la calle y nos aseguramos de que miles de familias reciban sus pedidos de manera puntual y segura.

Es fundamental que se establezca un pago mínimo de al menos \$30 por hora activa, y que además se compense el tiempo que pasamos conectados y disponibles, ya que estar listos para recibir pedidos también es parte del trabajo que mantiene viva la plataforma.

Muchos trabajadores dependen de este ingreso, y es injusto que gran parte del tiempo que dedicamos a la aplicación no sea remunerado. Como trabajadores independientes, debemos mantener nuestra flexibilidad y autonomía. No deberían imponernos horarios estrictos

ni reglas que limiten nuestra capacidad de organizar nuestro propio tiempo. Además, los tips nunca deberían quitarse, ya que representan una parte justa de nuestra compensación y reflejan directamente el esfuerzo y servicio que ofrecemos a los clientes.

Aprobar una ley de pago mínimo justo es un paso clave para garantizar dignidad, respeto y justicia económica para los trabajadores de Instacart. Esta ley no solo asegura un ingreso mínimo justo, sino que también protege nuestra independencia como contratistas, reconoce nuestro esfuerzo diario y contribuye a que la industria de entregas funcione de manera más ética y equitativa. Es hora de que se nos valore y que nuestro trabajo reciba la compensación que realmente merece. Como alguien que ha trabajado con Instacart, apoyo plenamente esta ley y hago un llamado a que se apruebe sin retrasos para el bienestar de todos los trabajadores de la plataforma.

Comment added December 5, 2025 11:34am

- **Md Shahjalal Rahat**

My name is Md Shahjalal Rahat I am a delivery worker I'm writing ask for fair pay for workers like me, we need instacart and other delivery companies to pay more than 21.44 per hour and to pay us for all the time we are actively working making deliveries and waiting time, we also need the pay to be clear and transparent, Intro 1332 is critical for us. It will help ensure that we can earn a real living wage. Please stand with us and support this measure. Thank you.

Comment added December 5, 2025 11:35am

- **Zalle**

A local \$30 minimum pay for grocery delivery workers would help ensure fair wages, better stability, and real protection from exploitation in the gig economy. Living expenses keep climbing, and this standard acknowledges how essential delivery workers are to the community. Oversight is important so companies stay accountable

and workers are treated fairly. Enforcing Deactivation Law 1332 is also vital to keep workers financially secure and safe from unfair deactivations.

Comment added December 5, 2025 11:37am

- **Nadimul Islam**

"Right now we are paid \$21.44/hr, but we are asking for \$30/hr for all Instacart workers.

We ask the pertinent agencies to align with Intro 1332 to provide protection against unfair deactivations to workers and prevent them from being punished for winning a vitally necessary right due to the hard and dangerous work they perform.

The delivery companies have to pay our tips, and schedules.

Comment added December 5, 2025 11:40am

- **Zoundi**

Pushing for a \$30 minimum wage for grocery delivery workers is a powerful way to secure fair treatment, stronger job protections, and an end to exploitation in gig work. It reflects the reality of rising living costs and honors the crucial service workers provide every day. We need strong oversight to make sure companies pay what they owe. And enforcing Deactivation Law 1332 is absolutely necessary to defend workers from arbitrary and unjust deactivations.

Comment added December 5, 2025 11:41am

- **jose mullo**

Soy José Mullo y he trabajado con Instacart. Cada día, millones de personas dependen de nuestro trabajo para recibir sus compras de manera rápida y segura. Sin embargo, muchas veces no se reconoce el esfuerzo, los gastos ni los riesgos que asumimos. Por eso, es necesario implementar un pago mínimo justo que refleje el valor real de nuestro trabajo.

Debemos recibir al menos \$30 por hora activa, y también se debe

pagar el tiempo que pasamos conectados y disponibles, porque esa disponibilidad es esencial para que la plataforma funcione. Además, como trabajadores independientes, necesitamos conservar nuestra flexibilidad y autonomía; no es justo que nos impongan horarios estrictos ni se nos quite parte de nuestros ingresos. Los tips nunca deberían quitarse, ya que son parte de la compensación por el esfuerzo y la dedicación que ponemos en cada entrega.

Una ley que establezca un pago mínimo justo garantizaría que los trabajadores de Instacart sean tratados con dignidad, respeto y justicia económica, reconociendo el valor real de nuestro trabajo y asegurando que podamos ganarnos la vida de manera digna.

Comment added December 5, 2025 11:45am

- **jony**

El trabajo de los repartidores de Instacart es esencial: usamos nuestros vehículos, pagamos gasolina y asumimos riesgos todos los días. Es justo recibir al menos \$30 por hora activa, y también que se pague el tiempo conectado. Como trabajadores independientes, necesitamos flexibilidad y que nuestros tips no sean quitados. Es hora de que nuestro esfuerzo sea reconocido con dignidad y respeto. Como trabajador independiente de Instacart, merezco mantener la libertad de organizar mis horarios, recibir un pago justo de \$30 por hora activa y que se compense el tiempo conectado. Los tips nunca deberían quitarse, ya que reflejan el esfuerzo y dedicación que ponemos en cada entrega. Una ley de pago mínimo protege nuestros derechos y asegura un ingreso digno para quienes sostenemos este trabajo.

Comment added December 5, 2025 11:47am

- **Arman Hossain**

"Given the current compensation of \$21.44 per hour, we respectfully request an increase to \$30 and the prompt passage of INTR 1332." The company they have to pay our tips, and give us our proper work hours.

Comment added December 5, 2025 11:48am

- **eloy martinez**

I fully support the passage of a fair minimum pay law for Instacart workers. Our work is essential: we use our own vehicles, pay for gas, take on risks, and ensure that thousands of families receive their orders quickly and safely. We should earn at least \$30 per active hour, and time spent connected and available should also be compensated, as being ready for orders is part of the job.

As independent workers, we need to maintain our flexibility and autonomy; companies should not impose strict schedules or take away our tips, which are an important part of our compensation for the effort and service we provide.

Passing this law will ensure dignity, respect, and economic justice for Instacart workers, recognizing our daily effort and guaranteeing that we can earn a fair living.

Comment added December 5, 2025 11:51am

- **Somlare**

Establishing a \$30 minimum wage for grocery delivery workers would be a positive step toward fair pay, dependable jobs, and more humane gig work. With living costs continuing to rise, this standard gives workers a real chance to make ends meet while recognizing their essential contributions. Oversight will help keep companies accountable. Enforcing Deactivation Law 1332 will also give workers the protection and financial safety they deserve.

Comment added December 5, 2025 11:56am

- **Mohammad ullah**

"Our community of workers deserves more than \$21.44/hr. We're asking for \$30/hr. We want our tips back, the company have to pay our tips back and give us our works hours.

Intro 1332 is essential for workers like me. It will help guarantee that we can earn a sustainable income. Please support it. Thank you.

Comment added December 5, 2025 11:58am

- **Issouf**

A local requirement of at least \$30 per hour for grocery delivery workers is necessary to secure fair earnings, reinforce job security, and put an end to gig worker exploitation. This pay level reflects the true cost of living and respects the value delivery workers bring to every community. Companies must be held accountable through strong oversight. Deactivation Law 1332 must also be enforced to stop unfair and unjustified account removals.

Comment added December 5, 2025 12:00pm

- **Luis Saavedra**

My name is Luis Saavedra, a 34-year-old delivery worker with 7 years of gig economy experience. I am writing to ask for fair pay for workers like me. We need Instacart and other platforms to pay more than \$21.44 an hour and include all active time, not just delivery time. Pay must be clear, honest, and transparent.

Instacart is my full-time job, but earnings change without warning. I often wait 20–30 minutes between batches without pay. Worse, many workers fear unfair deactivation that can erase our only income overnight. Intro 1332 is necessary to protect our rights and ensure fair treatment.

Please support us. Thank you.

3. ESPAÑOL

Mi nombre es Luis Saavedra, soy un trabajador de entregas de 34 años con 7 años de experiencia en la economía gig. Escribo para pedir un pago justo para trabajadores como yo. Necesitamos que Instacart y otras plataformas paguen más de \$21.44 por hora e incluyan todo el tiempo activo, no solo el momento de entregar. El

pago debe ser claro, honesto y transparente.

Instacart es mi trabajo de tiempo completo, pero los ingresos cambian sin aviso. A menudo espero 20–30 minutos entre pedidos sin recibir pago. Peor aún, muchos trabajadores tememos una desactivación injusta que puede quitarnos todo nuestro ingreso. Intro 1332 es necesaria para proteger nuestros derechos y asegurar un trato justo.

Por favor apóyenos. Gracias.

Comment added December 5, 2025 12:04pm

- **Yasin Arafat**

"Given the current compensation of \$21.44 per hour, we respectfully request an increase to \$30 and the prompt passage of INTR 1332."

Comment added December 5, 2025 12:07pm

- **ISRAEL CORONA**

I fully support the establishment of a fair minimum wage for Instacart workers. Our job is more than just delivering orders: it involves planning routes, handling customers' groceries with care, using our own vehicles, and covering all work-related expenses, in addition to the daily risks we face while driving. All of this happens while ensuring that thousands of families receive their groceries quickly and safely. It is essential that workers receive at least \$30 per active hour, and that we are also paid for the time we are logged in and available, because our availability is a crucial part of the service that makes the platform possible. Many times we work extra hours or wait for orders without receiving any compensation, which demonstrates the need for a minimum wage that reflects the true value of our work.

As independent contractors, we must maintain our flexibility and autonomy. It is not fair for us to be subjected to strict schedules or to have our ability to manage our own time limited. Furthermore, tips should never be taken away, as they are a direct part of our compensation for the effort, dedication, and service we provide with each delivery.

A law that establishes a fair minimum wage would not only guarantee a decent income, but it would also send a clear message: Instacart workers deserve respect, recognition, and economic justice. It's time to truly value the effort and daily responsibility of those of us who make the platform work, ensuring that we can work with dignity and stability.

Comment added December 5, 2025 12:14pm

- **Mohammad Masud**

My name is Mohammad Masud .i'm a delivery worker with 4 years of experience. I speak Bangla and English, and I work every day to support my family. I'm asking for fair pay between \$21.44 and \$30 per hour so that I can cover rent, food, and childcare. Companies sometimes deactivate workers unfairly, and I'm afraid of losing the only income my family depends on. If the company give our tips and workers hours then we can work properly.

Intro 1332 is necessary to protect us and ensure transparency in pay. Please support us. Thank you.

Comment added December 5, 2025 12:21pm

- **mateo**

My name is Mateo, a 28-year-old father of two and bilingual delivery worker. I am writing to ask for fair pay for workers like me. We need Instacart and other companies to pay more than \$21.44 per hour and compensate all the time we work—waiting, driving, and delivering. We need pay that is fair, predictable, and transparent.

I work long hours to support my children, but Instacart often lowers batch pay or keeps drivers waiting without compensation. The fear of sudden deactivation makes it difficult for parents like me to provide stability for our families. Intro 1332 is essential for protecting our livelihoods.

Please support us. Thank you.

5. ESPAÑOL

Mi nombre es Mateo, tengo 28 años, soy padre de dos niños y trabajador de entregas bilingüe. Escribo para pedir un pago justo para trabajadores como yo. Necesitamos que Instacart y otras compañías paguen más de \$21.44 por hora y compensen todo el tiempo trabajado—espera, manejo y entrega. Necesitamos un pago justo, predecible y transparente.

Trabajo muchas horas para mantener a mis hijos, pero Instacart baja los pagos o nos hace esperar sin compensación. El miedo a una desactivación repentina hace difícil crear estabilidad para nuestras familias. Intro 1332 es esencial para proteger nuestro sustento.

Por favor apóyenos. Gracias.

Comment added December 5, 2025 12:25pm

- **anonomus**

Es hora de que los trabajadores de Instacart recibamos un salario justo que refleje nuestro esfuerzo. Cada entrega implica tiempo, gastos y riesgos: usamos nuestros propios vehículos, pagamos gasolina y nos aseguramos de que los clientes reciban sus pedidos de manera correcta y puntual. Por eso es justo recibir al menos \$30 por hora activa, y también que se pague el tiempo que estamos conectados y disponibles, porque nuestra disponibilidad es parte del trabajo que mantiene viva la plataforma.

Como trabajadores independientes, necesitamos conservar la flexibilidad de nuestros horarios y la libertad de decidir cuándo trabajar. Además, los tips no deberían eliminarse, ya que representan una parte importante de nuestra compensación y reflejan el valor de nuestro servicio.

Implementar un pago mínimo justo no solo protege nuestros ingresos, sino que también reconoce la responsabilidad y dedicación que tenemos todos los días. Los trabajadores de Instacart merecemos respeto, estabilidad y un trato justo, y es momento de que la ley refleje eso.

Comment added December 5, 2025 12:26pm

- **nacho**

Instacart workers deserve fair pay for the work we do. Every order we deliver requires time, effort, and expenses: we use our own vehicles, pay for gas, and take on daily risks to ensure families receive their groceries on time and in good condition. That's why it's fair to earn at least \$30 per active hour, and also to be compensated for the time we are connected and available, since being ready for orders is a key part of the job.

As independent workers, we should maintain our autonomy and the ability to choose when to work, without being forced into strict schedules or unfair rules. In addition, tips should never be taken away, as they directly reflect our effort and dedication.

A law that establishes a fair minimum pay would ensure that Instacart workers have dignified income, respect, and recognition for the work we do every day, making sure our contribution is valued appropriately.

Comment added December 5, 2025 12:29pm

- **Mohammad Belayet Hossain**

My name is Mohammad Belayet Hossain, i speak Bangla,English. I work delivery almost 4 years,

Our community of workers deserves more than \$21.44/hr. We're asking for \$30/hr and for INTR 1332 to be passed right away."

Comment added December 5, 2025 12:35pm

- **Zongo**

Setting a \$30 hourly minimum for grocery delivery workers is a meaningful step toward fair pay, stable jobs, and better treatment in gig work. It recognizes both the rising cost of living and the essential work delivery drivers do every day. Proper oversight will make sure companies follow through. And Deactivation Law 1332 is key to

protecting workers from unreasonable deactivations and helping them maintain financial security.

Comment added December 5, 2025 12:37pm

- **Pamiti**

A \$30 minimum pay standard for grocery delivery workers is crucial for fair wages, better job security, and stopping exploitation. It matches today's cost of living and recognizes the importance of delivery workers. Oversight is needed to ensure companies comply. Enforcing Deactivation Law 1332 also protects workers from unfair deactivation and supports financial stability.

Comment added December 5, 2025 12:40pm

- **Kabore**

Adopting a \$30 minimum pay for grocery delivery workers is an important measure that supports fairness, employment stability, and ethical treatment in gig labor. As living costs rise, this standard reflects what workers truly need and deserve. Oversight ensures accountability and proper payment. Enforcing Deactivation Law 1332 further safeguards workers from wrongful or arbitrary deactivation.

Comment added December 5, 2025 12:43pm

- **Fade**

A mandatory \$30 hourly wage for grocery delivery workers is essential for fair compensation, job security, and the prevention of exploitation in the gig economy. It accurately reflects the real cost of living and recognizes workers' crucial contributions. Companies must be properly monitored to ensure they follow these rules. Enforcing Deactivation Law 1332 is equally important to protect workers from unfair account removals.

Comment added December 5, 2025 12:45pm

- **Felix**

My name is Felix, and I am a delivery worker...

I am 30 years old, worker with 6 years of experience doing deliveries. I work long hours for Instacart, yet the pay often drops below what is fair. Intro 1332 is important because it protects us from deactivations and gives us stability so we can support our families.

Please support us. Thank you.

ESPAÑOL:

Mi nombre es Felix, y soy trabajador(a) de entregas...

Tengo 30 años, soy un trabajador con 6 años de experiencia haciendo entregas. Trabajo muchas horas para Instacart, pero el pago muchas veces baja demasiado. La Intro 1332 es importante porque nos protege de desactivaciones y nos da estabilidad para poder mantener a nuestras familias.

Por favor apóyenos. Gracias.

Comment added December 5, 2025 12:47pm

- **Ponde**

Introducing a \$30 minimum wage for grocery delivery workers would help ensure fair pay, steadier jobs, and protections against mistreatment in gig work. With living costs rising, this standard acknowledges the essential service workers provide. Oversight helps ensure they're paid correctly. Enforcing Deactivation Law 1332 also protects workers from losing income due to unfair deactivation.

Comment added December 5, 2025 12:48pm

- **Gobinder Singh**

My name in Gobinder sing, i work delivery almost 3 years, if the company give our tips back, and our work hours then we can work properly in the street.

The rate is \$21.44/hr currently. We request an increase to \$30/hr and immediate approval of INTR 1332."

Comment added December 5, 2025 12:53pm

- **Camara**

A local policy establishing a \$30 hourly minimum for grocery delivery workers is essential to provide fair earnings, increase job reliability, and prevent abuse within the gig economy. This rate reflects modern living expenses and recognizes the important community service delivery workers offer. Effective monitoring is required to ensure companies pay workers as promised. Additionally, enforcing Deactivation Law 1332 protects workers from unjust deactivation and supports their financial well-being.

Comment added December 5, 2025 12:55pm

- **Md Arifur Rahman**

My name is Md Arifur Rahman, i work in delivery almost 4 years. "Given the current compensation of \$21.44 per hour, we respectfully request an increase to \$30.

We ask the pertinent agencies to align with Intro 1332 to provide protection against unfair deactivations to workers and prevent them from being punished for winning a vitally necessary right due to the hard and dangerous work they perform.

Comment added December 5, 2025 1:06pm

- **mario**

I fully support a minimum pay for Instacart workers. Our work comes with many expenses that we cover ourselves: gas, parking, tools, and other costs necessary to complete deliveries. Additionally, many times when we are fulfilling an order and cannot find certain products, the orders are removed or canceled, and we earn nothing for the time and effort spent.

This is why it is fair to establish a minimum pay per active hour, which recognizes our work, covers the expenses we incur, and ensures compensation for the time and dedication we put in every day.

Instacart workers deserve respect, stability, and fair income that truly values our effort.

Comment added December 5, 2025 1:06pm

- **Soumaila**

Establishing a local \$30 minimum-pay requirement for grocery delivery workers represents a crucial advancement in promoting fair compensation, improved working conditions, and long-term job security for individuals in the gig economy. As the cost of living continues to rise in cities and communities across the region, this pay standard more accurately reflects the economic realities facing workers who rely on delivery work as a primary or significant source of income. Grocery delivery workers contribute daily to the functioning of communities by ensuring that families, seniors, and busy households receive essential goods. Their labor deserves to be compensated fairly and transparently.

However, establishing a wage standard alone is not enough. Oversight and enforcement must be strong and consistent to ensure companies comply with these rules and provide workers with the full pay they have earned. In this same spirit, enforcing Deactivation Law 1332 is vital. This law protects delivery drivers from sudden, unfair, or arbitrary removal from platforms—removals that can instantly cut off a worker's livelihood. Ensuring the enforcement of this law not only secures financial stability for workers but also strengthens overall fairness and accountability in the gig economy.

Comment added December 5, 2025 1:09pm

- **Seydou**

Setting a local \$30 minimum pay rate for grocery delivery workers is an important step toward creating a fairer and more sustainable industry for people who work tirelessly to support their communities. Delivery workers often face unpredictable schedules, long hours, and rising expenses, all while playing a critical role in making sure groceries and household necessities reach families safely and on time. By establishing a living-wage standard that aligns with the growing cost of living, we recognize not only the value of their labor but also

the essential service they provide to residents who depend on them every day.

But fair pay must go hand in hand with meaningful protections. Oversight is essential to ensure companies honor their commitments and that workers receive accurate, timely compensation without hidden deductions or misleading pay structures. Additionally, enforcing Deactivation Law 1332 is a key element in protecting delivery workers from sudden, unjust, or unexplained deactivations—a problem that has affected countless gig workers and left them without income overnight. Upholding this law strengthens workers' rights, supports economic stability, and promotes a healthier, more just gig economy.

Comment added December 5, 2025 1:11pm

- **Ismael**

My name is Ismael, and I am a delivery worker...

I am 35 years old . Instacart is my main source of income. I am asking for \$25–\$30 per hour because raising a childres is expensive, and the current pay is not enough. Intro 1332 matters because it ensures protections and fair compensation for every hour we dedicate to this work.

Please support us. Thank you.

Mi nombre es Ismael y soy trabajador de entregas...
Tengo 35 años. Instacart es mi principal ingreso. Solicito \$25–\$30 por hora porque criar a mis hijos es costoso, y el pago actual no alcanza. La Intro 1332 es importante porque garantiza protecciones y una compensación justa por cada hora que dedicamos a este trabajo. Por favor apóyenos. Gracias.

Comment added December 5, 2025 1:13pm

- **Asseta**

Implementing a \$30 minimum-pay requirement for grocery delivery workers is more than just a policy decision; it is a statement of support for fairness, dignity, and economic justice within the gig economy. Delivery workers are often the invisible backbone of our communities, stepping in during emergencies, harsh weather conditions, and hectic schedules to ensure that people receive the essential groceries they rely on. As costs for food, rent, transportation, and basic necessities continue to climb, a \$30 wage standard helps ensure that these workers—who are essential in every sense of the word—can actually afford to live in the communities they serve.

However, achieving fair pay requires more than simply naming a number. Strong oversight is needed to hold companies accountable for following the rules, respecting workers' time, and paying them for all hours spent working, including waiting periods that are part of the job. Equally important is the enforcement of Deactivation Law 1332, which protects delivery workers from sudden and unjust platform deactivations that can destroy their financial stability without explanation or due process. Together, fair wages and firm protections create a safer, more respectful, and more sustainable environment for all gig workers.

Comment added December 5, 2025 1:14pm

- **Hamdadi**

Adopting a local policy that guarantees grocery delivery workers a minimum pay rate of \$30 per hour is an essential move toward establishing a fair, balanced, and accountable gig economy. Delivery workers play a critical role in modern life, ensuring access to groceries and necessities for households of all types, from busy families to individuals who cannot physically shop on their own. Despite the importance of this work, gig-based delivery has long been characterized by inconsistent pay, lack of transparency, and insufficient protections. A \$30 minimum-pay requirement addresses these issues directly by offering a standard that better aligns with

regional living costs and gives workers a more stable financial foundation.

However, wage requirements must be supported by strong enforcement mechanisms to ensure companies actually comply with the rules, pay workers for both active delivery time and waiting time, and present compensation in clear, understandable terms. Without oversight, wage rules risk becoming symbolic rather than transformative. Additionally, the enforcement of Deactivation Law 1332 is indispensable. This law ensures that workers are not unfairly or arbitrarily removed from platforms, which can lead to sudden income loss and destabilization. By upholding this law, we create a safer and more just environment for delivery workers—one where they have both the financial security and the respect they deserve.

Comment added December 5, 2025 1:16pm

- **Miguel**

My name is Miguel, and I am a delivery worker... I'm 27 and rely on Instacart as seasonal income because other jobs are unstable. Still, the pay needs to be at least \$21–\$30 per hour to survive. Intro 1332 is essential to prevent sudden deactivations during the months when we need income the most.
Please support us. Thank you.

ESPAÑOL:

Mi nombre es Miguel y soy trabajador de entregas... Tengo 27 años y dependo de Instacart como ingreso de temporada porque otros trabajos son inestables. Aun así, el pago debe ser al menos \$21–\$30 por hora para sobrevivir. La Intro 1332 es esencial para evitar desactivaciones repentinhas en los meses en que más necesitamos el ingreso.
Por favor apóyenos. Gracias.

Comment added December 5, 2025 1:18pm

- **Rosy Yos**

My name is Rosy Yos, and I am a delivery worker...

I'm 33 and have a college degree, but delivery work through Instacart is the only job flexible enough for my schedule. Even with my education, I cannot survive without fair pay. I ask for \$22–\$28 per hour, and I support Intro 1332 because it brings transparency and stability.

Please support us. Thank you.

Mi nombre es Rosy Yos, y soy trabajador(a) de entregas...

Tengo 33 años y un título universitario, pero este trabajo es el único que se adapta a mi horario. Aun con mi educación, no puedo sobrevivir sin un pago justo. Solicito \$22–\$28 por hora y apoyo la Intro 1332 porque trae transparencia y estabilidad.

Por favor apóyenos. Gracias.

Comment added December 5, 2025 1:24pm

- **Arafat Hossain Arif**

My name is Arafat Hossain Arif I am a delivery worker I'm writing ask for fair pay for workers like me, we need instacart and other delivery companies to pay more than 21.44 per hour and to pay us for all the time we are actively working making deliveries and waiting time, we also need the pay to be clear and transparent.

Intro 1332 is essential for workers like me. It will help guarantee that we can earn a sustainable income. Please support it. Thank you.

Comment added December 5, 2025 1:26pm

- **Md Amin**

I'm a delivery worker, and I'm reaching out to ask for fair compensation for people in my position. App-based delivery companies should pay workers at least \$30 an hour and make sure we're paid for all the time we spend actively delivering as well as the time we spend waiting. Our pay also needs to be clear and transparent. We work extremely hard, and we deserve protections—

especially against unfair deactivations that can threaten our livelihoods.

Intro 1332 is critical for us. It will help ensure that we can earn a real living wage. Please stand with us and support this measure. Thank you.

Comment added December 5, 2025 1:47pm

- **RODOLFO**

Instacart workers deserve a fair minimum pay that reflects all the effort and expenses we take on. Every delivery requires using our own vehicles, paying for gas, parking, and tools, as well as the time we spend searching for the correct products. Often, if we can't find an item, the order is removed or canceled and we earn nothing for that work, which is completely unfair.

This is why it's essential to have a minimum pay per active hour, ensuring compensation for the time, effort, and expenses we cover ourselves. This not only guarantees fair income but also recognizes the daily dedication of Instacart workers and allows us to continue providing reliable service.

Comment added December 5, 2025 2:53pm

- **Joshua**

My name is Joshua, and I am a delivery worker...

I am 30 years old, an immigrant worker with 6 years of experience doing deliveries. I work long hours for Instacart, yet the pay often drops below what is fair. Intro 1332 is important because it protects us from deactivations and gives us stability so we can support our families.

Please support us. Thank you.

Mi nombre es Joshua, y soy trabajador(a) de entregas...

Tengo 30 años, soy un trabajador con 6 años de experiencia haciendo entregas. Trabajo muchas horas para Instacart, pero el pago muchas

veces baja demasiado. La Intro 1332 es importante porque nos protege de desactivaciones y nos da estabilidad para poder mantener a nuestras familias.

Por favor apóyenos. Gracias.

Comment added December 5, 2025 3:04pm

- **david**

Soy David Dimas Pastor y apoyo totalmente el pago mínimo para los trabajadores de Instacart. Nuestro trabajo implica muchos gastos que corren por nuestra cuenta: usamos nuestros vehículos, pagamos gasolina, parking, herramientas y otros costos necesarios para realizar las entregas. Además, muchas veces, cuando estamos realizando un pedido y no encontramos algún producto, las órdenes nos son removidas o canceladas, y no recibimos nada por ese tiempo ni esfuerzo.

Por eso es justo que se establezca un pago mínimo por hora activa, que reconozca nuestro trabajo, cubra los gastos que asumimos y nos garantice compensación por el tiempo y dedicación que ponemos todos los días. Los trabajadores de Instacart merecemos respeto, estabilidad y un ingreso justo que valore realmente nuestro esfuerzo.

Comment added December 5, 2025 3:12pm

- **Estuado**

My name is Estuado, and I am a delivery worker. I am writing to ask for fair pay for workers like me. We need Instacart and other delivery companies to pay more than \$21.44 per hour and to pay us for all the time we are actively working—making deliveries and waiting time. We also need the pay to be clear and transparent.

I am 22 years old, to delivery work, and I depend completely on this income to survive. Instacart earnings often fall far below what we need. Intro 1332 is essential because it guarantees protections for new workers like me who have no other financial support.

Please support us. Thank you.

Mi nombre es Estuardo, y soy trabajador(a) de entregas. Escribo para pedir un pago justo para trabajadores como yo. Necesitamos que Instacart y otras compañías de entregas paguen más de \$21.44 por hora y que nos paguen por todo el tiempo que estamos trabajando activamente: haciendo entregas o esperando pedidos. También necesitamos que el pago sea claro y transparente.

Tengo 29 años, de este trabajo dependo totalmente de estos ingresos para sobrevivir. Lo que paga Instacart muchas veces no alcanza. La Intro 1332 es esencial porque garantiza protecciones para trabajadores nuevos como yo que no tienen otro apoyo económico. Por favor apóyenos. Gracias.

Comment added December 5, 2025 3:45pm

- **Romeo**

Mi nombre es Romeo, y soy trabajador(a) de entregas... Tengo 31 años y trabajé varios años en restaurantes antes de comenzar con Instacart. El pago es inconsistente y muchas veces demasiado bajo para las horas que trabajamos, pero cada dia la paso con pena porque la aplicacion nos amenaza en desactivarnos cuando en una tienda hay demora o enfrentamos climas no aptas para el minimo de tiempo que nos dan de entregar. Solicito por lo menos \$23–\$30 por hora. La Intro 1332 es importante porque protege a quienes pasamos de trabajos tradicionales a trabajos por plataforma. Por favor apóyenos. Gracias.

Comment added December 5, 2025 4:29pm

- **Eduardo Garcia**

My name is Eduardo. I am a member of the community. I write in support of delivery workers. I ask that delivery worker get paid \$30 per hour, including the time that they are active. It is necessary that pay is raised and becomes transparent.

Workers work hard but companies try to punish them by deactivating their applications and limiting their hours. That's why into 1332 is so important to protect them. So they earn a living wage.

Please support delivery workers.

Comment added December 6, 2025 4:08pm

- **Julio Reynoso**

Mi nombre es Julio Reynoso, quiero que se tome en cuenta el aumento de salario a los deliverita a la suma de 30 Dolores por ahora ya que es un trabajo de alto riesgo y pone en peligro su vida y exigimos , mayor transparencias en los pagos ya que entiendo que ellos son una pieza importante el la industria de la entrega y el reparticion de envio

Comment added December 6, 2025 4:08pm

- **Maria Yadito**

Soy una persona apoyando a los deliveristas a que le aumenten su salario minimo a 30 dolares por hora. Incluyendo el tiempo conectado y tiempo activo. Tambien pido que haya transparencia en sus pagos, porque es un trabajo muy peligroso, aparte la lluvia, la nieve, puede ser arollado por un carro a raiz de la lluvia y nieve, mal tiempo simplemente. Las compaÑias se van a vengar cuando pase la ley del salario minimo y van a desconectar a los trabajadores o les quitaran su trabajo por eso les pedimos que se alinien con la intro 1332 en contra de las desactivaciones injustas. Gracias

Comment added December 6, 2025 4:09pm

- **Jose Sumba**

Pagar minimum 30.00 x hrs el tiempo que estan conectado pedimos transparencia en el pago que paguen la intro 1332 para evitar las desactividades injustas

Comment added December 6, 2025 4:11pm

- **Doris**

Mi nombre es Doris soy miembro de la comunidad estoy escribiendo en apoyo a los deliveristas para que les suban el salario mínimo \$30 dls la hora con tiempo conectado y tiempo activo. Pedimos transparencia en el pago, que apoyen la intro 1332 para evitar las activaciones injustas

Comment added December 6, 2025 4:11pm

- **Andres**

Estoy apoyando a los deliveristas unidos Solicito que el pago mínimo sea de \$30 hora, para los trabajadores entregan comida , que les paguen el tiempo activo . Pido transferencia en el pago , solicito que aprueben la intro 1322 para evitar las desactivaciones injustas

Comment added December 6, 2025 4:12pm

- **Daniel**

Solicito que el pago mínimo sea de \$30 hora, para los trabajadores entregan comida , que les paguen el tiempo activo . Pido transferencia en el pago , solicito que aprueben la intro 1322 para evitar las desactivaciones injustas

Comment added December 6, 2025 4:13pm

- **Julioc paguay**

Solicito que el pago mínimo sea de \$30 hora, para los trabajadores entregan comida , que les paguen el tiempo activo . Pido transferencia en el pago , solicito que aprueben la intro 1322 para evitar las desactivaciones injustas

Comment added December 6, 2025 4:14pm

- **Jorge**

Mi nombre es Jorge es toy de acuerdo a que El pago minimo sea de 30 dolares por hora con tiempo conectaso y tiempo activo.Pedimos

transparencia de pago. Appyamos la intro para evitar las desactivacionew injustas.

Comment added December 6, 2025 4:14pm

- **Anonymous**

I was once a delivery worker and know the struggles and expenses that occur during transactions of product. I am writing to ask for fair pay for delivery workers. We need instacart and other delivery companies to pay more closely to 30 per hour and to pay all the time they are actively working- making, waiting or transporting. We also need the pay to be clear and transparent. Delivery workers struggle especially times when the companies try to punish workers by deactivating accounts or limiting hours. That is why intro 1332 us so important. It will protect us and make sure we can earn a living wage. Thank you

Comment added December 6, 2025 4:15pm

- **Janely**

My name is janely, and am a member of the community. I am writing in favor of intro 1332 am infavor and ask for a fair pay for instacart workers. We need instacart and other delivery companies to pay more than \$30.00 per hour and to pay them for all the time. We also need the pay to be clear and transparent.

They work hard, but the company sometimes tries to punish them by deactivating their account and limits their hours. That's why intro 1332 is so important-it will protect them and make sure they can earn a decent living wage.

Thank you!

Comment added December 6, 2025 4:16pm

- **Candida**

Yo como familia pido que se aumente el salario para los deliveristas que es necesario,pedimos transparencia y pagar el mínimo de \$30dls

que lo valen por que aparte de arriesgar la vida es en tiempos d frío así ellos hacen su trabajo para toda la comunidad muchísimas gracias , que apruebe n la intro 1332 para evitar la desaceleración de las aplicaciones injustas , solicito transparencia en los pagos

Comment added December 6, 2025 4:17pm

- **Candida**

Yo como familia trabajadora les pido que el aumento de salario para los deliveristas o repartidores de comida se les suva el salario mínimo á \$30dls la hora por que es un trabajo muy pesado y arriesgan la vida por toda la comunidad al pedir sus servicios à domicilio más cuando neva es peligroso y todo lo recibimos en cansa por ellos si ellos no prestarán sus servicios y trabajarán de deliveristas no tuviéramos sus atenciones y por favor aprobar la intro 1332 que haya transparencia en los pagos y les paguen el tiempo conectado y activo en las aplicaciones seles agradecemos antemano

Comment added December 6, 2025 4:37pm

- **Cándida**

Pedimos salarios justos, mínimo 30dls por hora. Que les paguen tiempo conectado y tiempo activo. Que ellos tengan transparencia sobre cómo reciben sus pagos y también que se alinien a la intro 1332. Porque es seguro que la compañía los desactivará injustamente.

Comment added December 6, 2025 4:40pm

- **Nataly**

Solicito que el pago mínimo sea de \$30 hora, para los trabajadores entregan comida , que les paguen el tiempo activo . Pido transferencia en el pago , solicito que aprueben la intro 1322 para evitar las desactivaciones injustas

Comment added December 6, 2025 4:45pm

- **Agustina Amigon**

My name is agustina amigon and I have a friend that work with instacart .iam writing to ask for fair pay for workers like him.we need instacart and other delivery companies to pay more than \$30.00 dollars per hour and to pay then for all the time they are actively working ,making deliveries and waiting time.They also need the pay to be clear and transparent.

They work hard,in very bad weather that can cause then an accident. And the company sometimes tries to punish then by deactivating theirs accounts or limiting hours. That's why intro 1332 is so important-it will protect them and it's going to make sure they can earn a living wage .

Please support them.Thank you

Comment added December 6, 2025 5:05pm

- **Antonio Ordoñez**

Solicito que el pago mínimo sea de \$30 hora, para los trabajadores qie entregan comida , que les paguen el tiempo activo . Pido transferencia en el pago , solicito que aprueben la intro 1322 para evitar las desactivaciones injustas

Comment added December 6, 2025 6:42pm

- **Moriah Engelberg**

As an NYC resident and consumer, I support the expansion of the minimum pay standard for 20,000 app-based delivery workers. They deserve fair pay for all the time they work—including making deliveries and waiting on the app—and clear, transparent compensation. We also urge the NYC Council to pass Intro 1332 to protect workers from unjust deactivations and ensure job security. New York relies on these workers every day, and they deserve safety, transparency, and fair compensation.

Comment added December 8, 2025 8:53am

- **Anonymous**

As an NYC resident and consumer, I support the expansion of the minimum pay standard for 20,000 app-based delivery workers. They deserve fair pay for all the time they work—including making deliveries and waiting on the app—and clear, transparent compensation. We also urge the NYC Council to pass Intro 1332 to protect workers from unjust deactivations and ensure job security. New York relies on these workers every day, and they deserve safety, transparency, and fair compensation.

Comment added December 8, 2025 9:00am

- **Anonymous**

As an NYC resident and consumer, I support the expansion of the minimum pay standard for 20,000 app-based delivery workers. They deserve fair pay for all the time they work—including making deliveries and waiting on the app—and clear, transparent compensation. We also urge the NYC Council to pass Intro 1332 to protect workers from unjust deactivations and ensure job security. New York relies on these workers every day, and they deserve safety, transparency, and fair compensation.

Comment added December 8, 2025 10:07am

- **Daniel Ocampo, NELP**

See attached.

[Comment attachment](#)

2025.12.8-NELP-Testimony-on-DCWP-Grocery-Delivery-Worker-Pay-Standard.pdf

Comment added December 8, 2025 10:20am

- **Anonymous**

As an NYC resident and consumer, I support the expansion of the minimum pay standard for 20,000 app-based delivery workers. They deserve fair pay for all the time they work—including making

deliveries and waiting on the app—and clear, transparent compensation. We also urge the NYC Council to pass Intro 1332 to protect workers from unjust deactivations and ensure job security. New York relies on these workers every day, and they deserve safety, transparency, and fair compensation.

Comment added December 8, 2025 10:30am

- **April Herms**

As an NYC resident and consumer, I support the expansion of the minimum pay standard for 20,000 app-based delivery workers. They deserve fair pay for all the time they work—including making deliveries and waiting on the app—and clear, transparent compensation. We also urge the NYC Council to pass Intro 1332 to protect workers from unjust deactivations and ensure job security. New York relies on these workers every day, and they deserve safety, transparency, and fair compensation.

Comment added December 8, 2025 10:45am

- **Manny Pastreich**

Thank you for the opportunity to submit these comments on the Department of Consumer and Worker Protection's proposed rules related to Local Laws 95, 107, 108, 113, 123, and 124 of 2025. These rules will provide the necessary framework for implementing critical minimum pay standards and strengthening protections for 20,000 app-based grocery delivery workers in New York City.

32BJ is the largest building service union in the country, representing over 185,000 members up and down the East Coast and 85,000 in the New York City metro area. Our members are primarily immigrants and people of color, and make up the workforce of essential cleaners, door-people, airport workers, and other building service workers who keep our homes, workplaces, schools, and transportation hubs up and running. 32BJ and our members have fought hard to negotiate strong contracts that provide a living wage, family-sustaining benefits, and

critical job protections, but we understand that many workers in this city still lack the level of compensation and stability our members enjoy.

New Yorkers depend on app food delivery drivers to get food every day and in the worst weather and in the worst times, including during floods and pandemics. They are essential to our city and deserve the ability to support their families and pay their bills. 32BJ SEIU supports DCWP's proposed rules to implement the vital set of protections the City has enacted to protect delivery drivers and ensure their well-being.

Thank you for the opportunity to submit these comments.

[Comment attachment](#)

32BJ-Comments-on-DCWP-App-Based-Delivery-Driver-Pay-Rules-12.8.2025.pdf

Comment added December 8, 2025 10:56am



SERVICE EMPLOYEES
INTERNATIONAL UNION
CTW, CLC

MANNY PASTREICH

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www.seiu32bj.org

Comments of 32BJ SEIU

On the Department of Consumer and Worker Protection's proposed rules related
to Local Laws 95, 107, 108, 113, 123, and 124

December 8, 2025

Thank you for the opportunity to submit these comments on the Department of Consumer and Worker Protection's proposed rules related to Local Laws 95, 107, 108, 113, 123, and 124 of 2025. These rules will provide the necessary framework for implementing critical minimum pay standards and strengthening protections for 20,000 app-based grocery delivery workers in New York City.

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New Yorkers depend on app food delivery drivers to get food every day and in the worst weather and in the worst times, including during floods and pandemics. They are essential to our city and deserve the ability to support their families and pay their bills. 32BJ SEIU supports DCWP's proposed rules to implement the vital set of protections the City has enacted to protect delivery drivers and ensure their well-being.

Thank you for the opportunity to submit these comments.

- **Peter Spencer**

Attached is testimony from the City Council Common Sense Caucus

[Comment attachment](#)

CSC-Testimony-LL124-Rules-12.8.25.pdf

Comment added December 8, 2025 4:15pm

- **Consortium for Worker Education**

Dear Department of Consumer and Worker Protection,

I am writing on behalf of the Consortium for Worker Education (CWE), which provides education, training, and child care services to over 30,000 New York City workers each year, to express our strong support for the proposed rule change to Local Law 124. CWE has been actively involved in addressing the needs of gig workers and conducting research on this sector of the workforce.

Last year we published the largest neighborhood-focused study of the gig workforce to date, interviewing over 400 gig workers based in Western Queens. In general, workers reported high rates of economic precarity and reliance on social assistance. Far from being a way to earn some extra income on the side, we found half of the gig workforce depended on gig work to meet their basic needs. Additionally, nearly half of delivery workers surveyed reported having filed a labor complaint.

Local Law 124 represents a strong step in increasing protections and standards for food delivery workers. This proposed rule change would rightfully extend minimum pay standards to grocery delivery workers, who deserve the same rights extended to other food delivery workers in New York City. We strongly encourage the adoption of the proposed rule change.

Sincerely,

Marco A. Carrión
President, Consortium for Worker Education

Comment added December 8, 2025 4:51pm

From: Eli A
To: [Jung, Karline \(DCWP\)](#)
Cc: [Ortiz, Carlos \(DCWP\)](#); [Radecker, Hali \(DCWP\)](#)
Subject: Re: [EXTERNAL] Re: Protect Flexibility for Grocery Delivery Workers
Date: Tuesday, November 18, 2025 1:30:06 PM

Yes, I saw that. I was like, whoa, she's fast. That's awesome. We will see y'all then. Thank you all for your time; until then I hope you all have an amazing week.

Peace, clarity, light, and love,

Eli AP

On Tue, Nov 18, 2025 at 1:10 PM Jung, Karline (DCWP) [REDACTED] wrote:
Hi Eli,

Yes, of course. I've just added them to the invite. Please let me know if you need anything else!

Best,
Karline

Karline Jung ~ NYC DCWP
Senior Legislative Analyst
t: 212-436-0210 | nyc.gov/dcwp

From: Eli A [REDACTED]
Sent: Tuesday, November 18, 2025 1:06 PM
To: Jung, Karline (DCWP) [REDACTED]
Cc: Ortiz, Carlos (DCWP) [REDACTED]; Radecker, Hali (DCWP)
[REDACTED]
Subject: Re: [EXTERNAL] Re: Protect Flexibility for Grocery Delivery Workers

Hello Karline,

Thank you all again for your willingness to meet with me. A few of my fellow shoppers who also signed the letter would like to join the conversation as well.

Could you please add the following participants to the calendar invite for our call on Thursday?

- Hermant Tilku – [REDACTED]
- Monica Smith – [REDACTED]

We appreciate your time and look forward to the discussion.

Peace, clarity, light, and love,
Eli AP

On Mon, Nov 17, 2025 at 11:52 Jung, Karline (DCWP) [REDACTED] [v](#) wrote:

Hi Eli,

Thank you for providing us with your availability. I will be sending over a meeting invite shortly for **Thursday, 11/20 at 12pm**.

We look forward to hearing from you all.

Best,

Karline

Karline Jung ~ NYC DCWP

Senior Legislative Analyst

t: 212-436-0210 | nyc.gov/dcwp

From: Eli A <[REDACTED]>
Sent: Friday, November 14, 2025 2:51 PM
To: Ortiz, Carlos (DCWP) [REDACTED]
Cc: Radecker, Hali (DCWP) [REDACTED]; Jung, Karline (DCWP) [REDACTED]
Subject: Re: [EXTERNAL] Re: Protect Flexibility for Grocery Delivery Workers

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Hello Deputy Commissioner Ortiz,

Thank you so much for your response and for sharing the Notice of Hearing. We appreciate the opportunity to engage directly with the Department as these important rules for Local Law 124 are being shaped.

We would welcome a meeting ahead of the hearing and are grateful that there's a possibility for our voices to be included in the public record. We are more than willing to participate in a recorded and transcribed conversation in accordance with the City Administrative Procedure Act.

To help schedule, here are several windows that work well on our end:

- Wednesday 11/19, 3:30pm-6:00pm
- Thursday 11/20, 9:00am-1:00pm

We're eager to share our experiences as grocery delivery workers, discuss the potential unintended consequences we're seeing, and collaborate on a path that protects both fair pay and the flexibility that makes this work viable for so many families.

Thank you again for your openness and willingness to meet. We look forward to the conversation. Thank you for your time and have a good weekend.

Peace, clarity, light, and love,

Eli AP

On Tue, Nov 11, 2025 at 17:05 Ortiz, Carlos (DCWP) [REDACTED] wrote:

Hello Eli,

Thank you for your correspondence. I wanted to share the attached Notice of Hearing related to rules for the implementation of Local Law 124. We welcome your comments, either written or orally at the public hearing scheduled for December 8th at 11:00AM.

I'm also happy to meet with you ahead of the public hearing. Pursuant to the requirements of the City Administrative Procedure Act, our meeting would need to be recorded and transcribed in order to be included in the public record for the rulemaking. If this is of interest, please send me a range of dates and times that work on your end.

Best,

Carlos

Carlos Ortiz ~ NYC DCWP

Deputy Commissioner of External Affairs

t: 212-436-0345 | nyc.gov/dcwp

From: Eli A edliani.almonte@gmail.com

Sent: Monday, November 10, 2025 1:34 PM

To: Mayuga, Vilda Vera (DCWP) [REDACTED]; Ortiz, Carlos (DCWP) [REDACTED]

Subject: [EXTERNAL] Re: Protect Flexibility for Grocery Delivery Workers

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Dear Commissioner Mayuga and Deputy Commissioner Ortiz,

I wanted to kindly follow up on the note below from New York grocery delivery workers regarding Local Law 124. We remain eager to meet and share how the proposed rule could unintentionally reduce our flexibility and earnings opportunities.

Would you or a member of your team have time this week or next to discuss? We'd be grateful for the chance to ensure these rules truly support workers like us.

Thank you again for your time and consideration.

Peace, clarity, light, and love,

Eli AP

On Fri, Nov 7, 2025 at 09:16 Eli A <[REDACTED]> wrote:

Dear Commissioner Mayuga and Deputy Commissioner Ortiz,

We are grocery delivery workers working on Instacart in New York City. We are proud to serve our neighborhoods by delivering groceries and essential goods. The Instacart platform provides us with flexible, on-demand earnings opportunities that allow us to choose when, where, and how long we work—an invaluable resource that helps us balance family, education, and other responsibilities.

As DCWP drafts rules to implement Local Law 124, we're deeply concerned that applying the restaurant delivery pay model to grocery delivery will harm us. Doing so would put the flexibility we rely on at risk by potentially forcing platforms to adopt rigid shifts, reducing our earnings opportunities, and making grocery delivery work unsustainable—just like what we saw happen for restaurant delivery workers in 2023.

You have the opportunity to ensure Local Law 124 provides fair pay without sacrificing our flexibility. That's why we kindly request for a meeting to discuss the unintended consequences of this law.

We urge DCWP to:

1. **Preserve flexibility** by basing pay only on active delivery time.
2. **Engage directly with workers and grocery delivery apps** to design a rule that avoids unintended harm.
3. **Monitor and adjust** the rule if it reduces opportunities, tips, or affordability.

We understand that the City Council thinks they are doing the right thing by grocery delivery workers, but they don't understand the impacts. We do not want to sacrifice the flexibility, or independence that makes this work possible for so many of us.

We request a meeting with you and other senior leaders at DCWP to

share our stories and explain how this law could impact us directly.

Sincerely,

Eli Amonte-Perez, Manhattan

Monica Smith, Bronx

Tiffany Goodman, Brooklyn

Lashawanda Wilson, Long Island

Michael DeSabato, Queens

Tiffany Pratt, Queens

Paul Gaywood, Bronx

Natnael Reda, Bronx

Hermant Tilku, Queens

Jueni Cruz, Bronx

Peace, clarity, light, and love,

[Eli AP](#)

From: [Radecker, Hali \(DCWP\)](#)
To: [Caroline Engel](#)
Cc: [Jung, Karline \(DCWP\)](#); [Danna DeBlasio](#); [Ortiz, Carlos \(DCWP\)](#)
Subject: Re: [EXTERNAL] Contracted Delivery Workers Published Rules
Date: Monday, December 22, 2025 11:54:54 AM

Hi Caroline --

Following up on the below.

Thanks!
Hali

Hali Radecker ~ NYC DCWP
Director of Legislative Affairs
t: 212-436-0161 | nyc.gov/dcwp

From: Radecker, Hali (DCWP) [REDACTED]
Sent: Friday, December 19, 2025 10:51 AM
To: Caroline Engel [REDACTED]
Cc: Jung, Karline (DCWP) [REDACTED]; Danna DeBlasio [REDACTED]
Ortiz, Carlos (DCWP) [REDACTED]
Subject: Re: [EXTERNAL] Contracted Delivery Workers Published Rules

Hi Caroline,

Can you explain what “tracked the activity” means, in the context of mailing a postcard? I ask because typically someone mails a postcard by placing a stamp on it and putting it in a U.S. mailbox. Did the mailing partner mail the postcards you believe are missing, or did Instacart shoppers mail them? If the mailing partner sent them, what role did Instacart shoppers play in any process of generating the postcards? We’d welcome all information you can provide about how the process worked and workers’ role.

Thanks,
Hali

Hali Radecker ~ NYC DCWP
Director of Legislative Affairs
t: 212-436-0161 | nyc.gov/dcwp

From: Caroline Engel [REDACTED]
Sent: Wednesday, December 17, 2025 5:07 PM
To: Radecker, Hali (DCWP) [REDACTED]
Cc: Jung, Karline (DCWP) [REDACTED]; Danna DeBlasio [REDACTED]; Ortiz, Carlos (DCWP) [REDACTED]
Subject: Re: [EXTERNAL] Contracted Delivery Workers Published Rules

Hi Hali,

Thanks for the update. The mailing partner tracked the activity of shopper comments and that's how we

know how many were submitted.

Best,
Caroline

Caroline Engel
CMW Strategies

On Wed, Dec 17, 2025 at 4:20 PM Radecker, Hali (DCWP) [REDACTED]
wrote:

Hi Caroline!

We have received a few more and are adding them to the public record first thing in the morning. But, could you explain what a mailing partner is, and what that entity's role is with respect to gathering and mailing the documents you are describing?

Thanks,
Hali

Hali Radecker ~ NYC DCWP
Director of Legislative Affairs
t: 212-436-0161 | nyc.gov/dcwp

From: Caroline Engel <[REDACTED]>
Sent: Wednesday, December 17, 2025 9:59 AM
To: Radecker, Hali (DCWP) <[REDACTED]>
Cc: Jung, Karline (DCWP) <[REDACTED]>; Danna DeBlasio <[REDACTED]>; Ortiz, Carlos (DCWP) <[REDACTED]>
Subject: Re: [EXTERNAL] Contracted Delivery Workers Published Rules

Good morning Hali,

Following up here to see if there is any update regarding the missing shopper postcard comments. We have confirmed with the mailing partner that an additional 1,084 comments were mailed.

The team has since gone ahead and submitted all the comments online via the "email the commissioner" form. Can you confirm if those have been received?

Thank you,
Caroline

Caroline Engel
CMW Strategies

On Wed, Dec 10, 2025 at 4:23 PM Radecker, Hali (DCWP) <[REDACTED]>
wrote:

|

Hi Caroline,

We will check with our mail office, but we have individually scanned and all of the post card comments that we have received thus far.

Hali

Hali Radecker ~ NYC DCWP
Director of Legislative Affairs
t: 212-436-0161 | nyc.gov/dcwp

From: Caroline Engel [REDACTED]
Sent: Wednesday, December 10, 2025 4:22 PM
To: Radecker, Hali (DCWP) <[REDACTED]>
Cc: Jung, Karline (DCWP) [REDACTED]; Danna DeBlasio <[REDACTED]>; Ortiz, Carlos (DCWP) <[REDACTED]>
Subject: Re: [EXTERNAL] Contracted Delivery Workers Published Rules

Thanks for the quick response. The comments were sent in via mail.

Caroline Engel
CMW Strategies

On Wed, Dec 10, 2025 at 4:20 PM Radecker, Hali (DCWP)
<[REDACTED]> wrote:

+

Hi Caroline,

How did the workers submit comments?

Hali

Hali Radecker ~ NYC DCWP
Director of Legislative Affairs
t: 212-436-0161 | nyc.gov/dcwp

From: Caroline Engel <[REDACTED]>
Sent: Wednesday, December 10, 2025 4:18 PM
To: Radecker, Hali (DCWP) [REDACTED]; [REDACTED]
Cc: Danna DeBlasio <[REDACTED]>
Subject: [EXTERNAL] Contracted Delivery Workers Published Rules

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Hi Hali and Karline,

Hope you're both well.

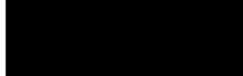
I see the comments have been made public from Monday's rule hearing regarding contracted delivery workers. We believe there are missing comments in the published PDF. Over 1,800 grocery delivery workers submitted comments, but we only see 12-13 of them scanned in for the record. Did you receive these and will they be added to the record?

Please let us know.

Thank you!

Caroline Engel
Senior Associate
CMW Strategies

233 Broadway, Suite 2310
New York, NY 10279

A solid black rectangular box redacting contact information.

DCWP received approximately ~1,800 emails to the email address dcamail@dcwp.nyc.gov on December 17-19. These late-received comments will be posted once personal identifying information is redacted.