



Comments Received by the Department of
Consumer and Worker Protection on
Proposed Rules related to General Vendor License Waitlists

IMPORTANT: The information in this document is made available solely to inform the public about comments submitted to the agency during a rulemaking proceeding and is not intended to be used for any other purpose



Testimony to Department of Consumer and Worker Protection

Wednesday 8/19/2026

Mohamed Attia

Managing Director of the Street Vendor Project

at the Urban Justice Center

Dear Commissioner Levine and DCWP staff,

Thank you for the opportunity to testify today in this proposed set of rules.

My name is Mohamed Attia and I'm the Managing Director of the Street Vendor Project at the Urban Justice Center.

The Street Vendor Project (SVP) is a membership-based organization with more than 3,500 vendor members. We strive to support street vendors across the 5 boroughs by providing direct services, legal representation, and access to a wide variety of resources. We also organize to build power to the vendors community across the city and ensure that their voices are heard, and they have a seat at the table when policies and rules are being developed that will impact their livelihoods. Vast majority of our over 3,000 members are immigrants who hail from across the globe. Given the diversity of our membership, our services are offered in 7 different languages, Arabic, Bangla, English, French, Mandarin, Spanish and Wolof, thanks to the diversity of our small team.

For the last 47 years merchandise vendors haven't had the opportunity to obtain the general vendor license due to the outdated laws and the cap placed on the licenses back in 1979. Now, we are at a historic moment. After 25 years of building the vendor movement, and after 12 years of consistent organizing and advocacy

Vendors finally passed the street vendor reform.

This reform is leading to the creation of 10,500 new general vendor licenses.

Today, the agency is discussing a rules proposal that will impact the livelihood of thousands of merchandise vendors across the city and will eventually change the landscape of the street vending industry.

We're thrilled to see the agency intending to prioritize currently operating vendors to receive the licenses after the existing waitlist is offered the opportunity to apply for the license.

However, the proposed rules fall short of clarifying how the agency will do that.

In the proposed rules, the agency mentions that

"New prospective applicants requesting to be placed on such new waitlists may certify, in a form and manner as determined by the Commissioner."

This section is very vague and left us wondering what that would mean for the vendors who have been waiting for this change for decades.

The proposal before us today doesn't ensure that currently operating vendors will get priority to receiving licenses.

The agency is planning to rely on applicant's self-certification that they're currently vending without providing any proof that validates their claim!

Now, who knows how many people will apply for the waitlist?

Maybe a few hundred... and maybe tens of thousands.

And this means that currently operating vendors would be gambling!

They'll be playing lottery to get a license and formalize their businesses

And what are the odds of this lottery?

Nobody knows! It could be 1 to 2. It could be 1 to a 100

And if you don't win the lottery, and don't get the license right away, you'll be placed on a waitlist, and wait ... AGAIN ... for unknown number of years until a license becomes available!

Maybe vendors' grandchildren will get this license in 50 years!

I urge the agency to take the comments and proposals of the vendors today seriously.

I urge you to do the hard work that is required to ensure the license distribution happens in a fair and equitable way

Otherwise, the agency is letting bureaucracy wins, and bureaucracy can destroy people's livelihoods.

In a year from now, after the rollout, if all licenses are issued and we still have thousands of vendors operating without a license, DON'T dare blame the vendors again, don't even blame the local laws.

Look in the mirror and blame yourself and your processes.

I urged everyone in the Mamdani Administration to pay attention to this issue

These are thousands of families and their livelihood on the line right now.

Nobody should ever gamble with that!

We respectfully request that the agency clarify the rules in a way that ensures currently operating vendors are being prioritized in receiving the licenses.

A simple proof from each applicant will go a long way

Here are some proposals to enhance the process:

1. In regard to the creation of waitlist of currently vending applicants; the agency should require a form of proof from each applicant that they are **“currently vending (between January 29, 2025, and November 2, 2026)”** such proof options could include the of the following:
 - a. Timestamped pictures of the applicant while vending
 - b. Civil or criminal summonses were received while vending at any point in the past.
 - c. Receipts of wholesale purchases of their supply and merchandise.

- d. Letters stating that the applicant is known to be a vendor in the community signed by neighbors, customers, community leaders, nonprofit organizations, faith institutes, elected officials, etc.
 - e. Certificate of Authority to collect sales taxes in NYS.
 - f. Sales tax filings.
- 2. Prioritizing food vendors isn't something the vendor community supports. Food vendors run food businesses, and they shouldn't be prioritized more than vendors who sell merchandise currently.

3. **Concerns and recommendations regarding the process of offering licenses to vendors on the current waitlist.**

DCWP sent letters to individuals on the waitlist in late July to apply for the GVL.

- a. The letter was sent to vendors in English only, and the only word translated into other languages is "Questions" which isn't helpful to the community.
 - i. We urge the agency that further communication with the vending community happens in multiple languages. The primary languages vendors speak are Spanish, Arabic, Bangla, Wolof, French, Mandarin, Cantonese, and English.
- b. There's no clarity in the letter that vendors can submit the application in person. Such a service should be stated clearly since most vendors are not comfortable using technology, which makes them rely on organizations and service providers who may not provide competent services.
- c. Offering green licenses to applicants who are submitting applications now till 10/29/26 isn't equitable since some of them might be running businesses in Manhattan, and the green license won't benefit them. On the contrary, it would prevent an outer Brough vendor from accessing this license while the Manhattan vendor is waiting for their turn to get the white license.
 - i. We recommend that the agency allow vendors to choose to apply for the green license or apply for the white license waitlist after the white licenses run out.
- d. Listing green license holders automatically in the waitlist for white licenses isn't ideal and does disservice to Manhattan vendors who want to apply for the white licenses. Vendors should be offered the option to apply for the license they want, and to be listed for the waitlist they prefer, to avoid competition over the limited number of white licenses.

4. Ensure DCWP's processes of enrollment to the waitlist and submission of GVL applications are accessible to the street vendor population, taking into account limited digital literacy and interest in in-person submission of applications.

This could be accomplished through the following recommendations:

- a. Allow for individuals who go in person to the DCWP office without an appointment, to make an appointment onsite for a future date
- b. Ensure that DCWP licensing staff allow vendors to fill out paper applications, rather than requiring them to create online accounts

It's important to always remember that this change is historic in many ways. Vendors fought for this change. It's the first time in 47 years the city is creating new General Vendor Licenses for non-veteran merchandise vendors, and we're counting on the agency to ensure the process is equitable and will not leave any operating vendor behind.

We don't have the luxury of testing a process and see if it works.

We don't have the luxury of messing up!

We can't let the vendors down on this one.

Thank you.

Mohamed Attia



DCWP General Vendor License Hearing
August 19, 2026
Testimony of Matthew Shapiro, Legal Director
Street Vendor Project, Urban Justice Center

My name is Matthew Shapiro and I am the Legal Director at the Street Vendor Project at the Urban Justice Center. SVP is a membership organization of over 3,000 street vendors that organizes and provides legal services to vendors in New York City. In my role as legal director I constantly advise and assist vendors on all street vendor laws, rules, and processes relating to licensing and permitting. I frequently liaise with City agencies including DCWP in regards to specific vendor applications for licenses and permits issued by City agencies.

I want to focus on one aspect of the license and waiting list application process that has been an issue for many vendors—the lack of meaningful in-person opportunities to submit license applications at DCWP’s office at 42 Broadway.

As you know, for the past several years, DCWP has been closed to walk-ins for any information or application processing. Before the COVID-19 Pandemic, vendors and other individuals could simply visit 42 Broadway without an appointment. Now, many vendors consistently tell me that they are unable to apply for or renew a license or permit because they cannot get an appointment.

Now luckily for those vendors who know SVP, I can email DCWP and do the necessary follow-ups to ensure that an appointment is made. However, many vendors who aren’t fluent in technology and are subject to intermittent phone service, often are not able to secure appointments.

There have also been cases of vendors who try to get an appointment but by the time DCWP responds, their offer of a license or permit has expired and are then subject to the Agency’s appeal process. Additionally, the DCWP license website frequently times out

during the license application process which will lead to many applicants needing assistance completing the application.

All of this shows that in-person appointments and walk-in hours are necessary for much of the vending community. Many people are not comfortable using email and do not know how to navigate the telephone recording and voicemail system to request an appointment. I suggest that DCWP create walk-in hours during the week, especially given the new increased amount of general vendor licenses that are coming to be issued.

DCWP must also consider more concrete proof of past and current vending activity when determining waitlist priority for the new general vendor licenses. Allowing people to submit actual proof, rather than just self certification, that they are vendors will ensure that those who need the licenses most will get first priority to allow for equitable distribution.

I hope that the Department will seriously consider these suggestions when thinking about the most equitable methods and processes to ensure that vendors can apply for and receive these licenses.

Thank you for the opportunity to testify today.

08/19/2026

Statement from Lisa Sorin, President of the Bronx Chamber of Commerce, on the Department of Consumer and Worker Protection's Proposed Rules Change on Vendor Licensing

Commissioner Levine and members of the Department of Consumer and Worker Protection,

My name is Lisa Sorin, and I am the President of the Bronx Chamber of Commerce. The Chamber represents businesses in every zip code of the Bronx, with 85% of our businesses being micro businesses with fewer than 10 employees.

First, the Chamber wants to acknowledge and appreciate the work DCWP has done to strengthen New York City's street vending system. We recognize that the current vending system is extremely broken, and we therefore support efforts to bring vendors into a clear, regulated licensing system. We also appreciate that these proposed rules recognize the need for stronger enforcement by increasing penalties for certain violations and establishing new violations related to cleanliness, obstructions, and proper waste disposal.

As the City moves forward with making thousands of additional general vendor licenses available, we believe enforcement against illegal vending must be prioritized equally. Enforcement is of particular importance in the Bronx, where illegal vending negatively impacts public space for pedestrians and local businesses across our commercial corridors. These businesses already face significant operating costs, including rent, wages, taxes, and compliance with City regulations.

Illegal vending is particularly harmful to small businesses and bodegas, which often operate on narrow margins and depend on consistent foot traffic and sales. An unlicensed vendor selling similar food, beverages, or merchandise directly outside a legitimate business can take customers away from that business while contributing to congestion, sanitation issues, and other quality-of-life concerns.

It also creates an unfair situation for legal street vendors. Licensed vendors are an important part of our local economy and our commercial corridors. But when illegal vendors are allowed to operate alongside them without meeting the same requirements, the vendors who have taken the time and expense to comply with the law are placed at a disadvantage.

That is why we encourage DCWP to work closely with the Department of Sanitation, which is responsible for street vending enforcement, to ensure that enforcement capacity grows alongside the number of licenses being issued.

The City is taking an important step by creating a pathway for more vendors to become licensed. But licensing alone cannot solve the problems facing our commercial corridors. There must also be meaningful enforcement against those who continue to operate illegally.

DCWP has an important role in licensing, education, and establishing clear standards, while DSNY is responsible for enforcement in our neighborhoods. These agencies should work together to identify problem areas, coordinate enforcement, and ensure that the rules are being applied consistently.

Thank you

Online comments: 10

- **Michele Birnbaum**

I am submitting testimony on the new Vendor Legislation along with Resolutions on street vending passed by my Community Board 8 Manhattan where I am Co-chair of the Vendor Task Force. There will be multiple uploads.

[Comment attachment](#)

Testimony-Intro-0431-0431-A-0431-B-final-final.docx

Comment added August 5, 2026 5:26pm

Testimony Intro 0431-2024, Intro 431A and Intro 431-B

August 19, 2026

Good Afternoon Chair Epstein and Council Members:

My name is Michele Birnbaum, and I am Co-Chair of CB8 Manhattan's Vendor Task Force Committee, which I initiated and have Chaired or Co-chaired for the past 20 years.

It is disturbing to say that, despite our many resolutions and my testimony at City Council hearings over these many years, very little has been achieved in terms of important changes to vendor law and compliance, and if anything, much ground has been lost.

The numbers of street vendors, in all categories, has increased with little regard for the negative influences on the business and residential communities that they impact.

While, at my repeated suggestion over the years, enforcement has become a consideration, which it hadn't been in the beginning, even **this** bill does not include a percentage of enforcement agents to vendors on the street. It only says there will be "sufficient" enforcement, and my estimation of "sufficient" is vastly different than yours; it has been proven that the numbers of enforcing agents in the field has always been inadequate for the task at hand. The Bill also talks about enforcement protocols in the Parks, which I am glad to see, but in the past, Parks' enforcement fell to PEP officers, of which there are also way too few.

Can you acknowledge that increasing the number of supervisory licenses to 2000/2200, making available 10,500 additional licenses in 2027 consisting of 2,625 general vending licenses for Manhattan and 7875 for the outer boroughs would, necessarily, bring over-crowding to our streets, impede the pedestrian way and negatively impact sanitation. Additionally, you presume vendor compliance, which is more-often-than-not, recalcitrant. I have two cases in my neighborhood where a cart and a truck have been in one place in the street and on the sidewalk for years, never leaving for daily cleanings in their commissaries.

Commissaries are another concern. As they are not government run or owned, they have no obligation to remain in business or at a specific location, if business

is not good. If they close-up shop, that eliminates a geographically convenient commissary location for vendors in that area.

I act as a contact person for my community and encourage those who complain to get a 311 number and forward it to me, with visuals, if possible, and I personally forward these to my contacts at DOS, DOHWP, PEP, etc. Even if the inspector visits the vendor, the vendor is only given warnings, and rarely does the visit result in a ticket or removal. Unless there are repeated visits in the days and weeks that follow, the ticket is taken as a one-time warning, and its expense is the cost of doing business. Accumulating tickets over a two-year period before a substantial reprimand is given, gives the vendor too much time on the street with the violation, which during those years, continues to have a negative impact on the community. The monetary penalties are not punitive, and compared to daily earnings, they are not substantial enough to change behavior. Vending without a license should result in arrest.

The newly proposed Street Vendor Advisory Board consists of members from every conceivable government organization and professional group; however, there is no resident or resident Association included. It consists of the Commissioner of Consumer and Worker Protection, The Commissioner of Health and Mental hygiene, the Commissioner of Small Business Services, the Commissioner of Transportation, the Commissioner of Sanitation and the Police Commissioner, or their designee, the Speaker of the Council or their Designee, 10 members appointed by the speaker, two of whom represent street vendors, one of whom represents the small business community , one of whom represents organizations representing workers and retail stores, one of whom represents property owners, one of whom represents veterans, one of whom represents grocery stores, one of whom represents the restaurant industry in low-income communities, and one of whom represents a community organization, and 6 members appointed by the mayor, two of whom represent street vendors, and two of whom represent small business , one of whom represents the immigrant community and one of whom represents the low-wage worker. One such appointment from the Speaker of the Council and one such appointment by the Mayor shall be appointed of the street vendor advisory board.

There are no residents or members of resident Community Organizations on the Board.

The sadness is that my Community Board has put forth resolutions (attached) over the years that would not only address all the issues of non-compliance, but also suggests processes that would ensure compliance and ensure a better run industry. Our resolutions have routinely been ignored. For example, licenses could be priced in accordance with location. The more populated a location, the more costly the license; tracking cart and truck locations, using the chips that are installed on the truck or cart at each permit renewal could help monitor compliance with the law. This would ensure that the vehicles obey the days and hours permitted for vending and confirm that a vendor has returned to his commissary every 24 hours.

It would provide a tracking mechanism so that vendors do not cluster, do not fight over locations, formalize siting and provide uniform, centralized control over the industry.

Furthermore, it can't be stated strongly enough that if you are bringing street vending into the small business community and giving them a division in the Mayor's *Small Business Services* office, that you have to treat them as though they are a small business and are capable of and expected to follow the laws and obey all the rules and pay their fines. You cannot infantilize them, as I have witnessed at these hearings over the years. They are not children, but adults who are as capable as any of buying trucks or carts, going through the licensing process, getting business loans, paying suppliers, keeping the books and doing all other things necessary to keep a small business in operation. When they break the law or infringe on others, they should be held accountable, with no gentle easing and excuses used to avoid culpability.

I've been working on vending issues for over 40 years as a member of my Block Association and in my Community Board work, and I am disheartened that each iteration of vending law is reluctant to seriously and efficiently control this industry, which has now grown to include conglomerates, over-seas proprietors, a large legal team and worker defiance.

Stop listening to the vendor lobby, and start listening to the people in the community who consistently complain about street vendors - the numbers, the

lack of compliance, the lack of sanitation and the intrusion. These bills are woefully inadequate in addressing any of those issues.

What are you going to do to help?

This legislation falls woefully short!

Thank you!

Michele Birnbaum, Co-chair

Vendor Task Force

Community Board 8 Manhattan



- **Anonymous**

I support the repeal of the rule creating a waitlist for general vendor licenses. This is a stagnant, outdated area of policy that doesn't achieve its purpose of creating order and achievable compliance incentives among street vendors, notably because the majority of street vendors across NYC (irrespective of type) are currently operating without licenses. I support this change as part of broader street vending reform across NYC.

Comment added August 14, 2026 2:53pm

- **Tom Harris**

My name is Tom Harris, and I am the President of the Times Square Alliance. Our biggest problems in Times Square are not unlicensed vendors, but rather vendors not complying with time, place, and manner restrictions, as well as the inconsistent enforcement of those regulations. Time, place, and manner restrictions attempt to balance the competing uses of our sidewalks. Violations of these restrictions add to chaos, confusion, disorder, and they diminish the experience for the hundreds of thousands who visit Times Square daily. We would be supportive of increasing the number of vendors and restructuring the waitlist if there was an enforcement scheme that demanded and achieved compliance with existing time, place, and manner restrictions or risk revocation of the license and/or permit.

Comment added August 17, 2026 3:26pm

- **Pierina Sanchez**

Dear Commissioner Levine:

For decades, New York City's broken street-vending system forced hardworking vendors into the shadows, not because they refused to follow the rules, but because arbitrary license caps made compliance impossible. Local Law 54 of 2026 is a historic step toward correcting that injustice by formalizing thousands of our smallest businesses and

pairing expanded access with clearer rules, education, and accountability.

I am encouraged to see DCWP begin implementing this reform, including preserving priority for people on the existing general-vendor waitlist and recognizing vendors already working who never had a fair opportunity to join it. But reforms only matter if the people they were designed to serve can actually benefit.

That is why I am concerned that relying too heavily on self-certification of prior vending activity could allow longtime vendors to be pushed aside. Implementation must include a meaningful, fair process to verify existing vendors and ensure those who endured years of exclusion are not left behind again.

I therefore respectfully recommend the following:

1. Meaningfully prioritize existing vendors

DCWP should require applicants claiming priority as existing vendors to provide at least one form of documentation showing prior vending activity during the period specified in the proposed rule.

Recognizing that many vendors have operated within an informal system created by the City's restrictive licensing structure, DCWP should accept a broad and flexible range of evidence, including:

- Dated wholesale receipts or records documenting purchases of merchandise or supplies;
- A New York State Certificate of Authority or sales-tax filings;
- Timestamped photographs showing the applicant vending;
- Letters from customers, neighboring businesses, faith institutions, community organizations, elected officials, or other individuals familiar with the applicant's vending activity; or
- Civil or criminal summonses issued in connection with vending;

DCWP should publish clear standards before the application period begins so vendors understand exactly what will be accepted. Applicants should also receive notice and a reasonable opportunity to clarify or supplement their submissions before being denied priority because documentation is incomplete.

2. Design the application process around the vendor community

The application and waitlist-enrollment process must account for language barriers, limited digital literacy, and unequal access to technology. Notices, instructions, and assistance should be available in the languages commonly spoken by vendors.

I strongly recommend DCWP provide meaningful in-person options, including application assistance and secure drop-off locations accessible across all five boroughs because a historic expansion should not be undermined by an application process that excludes the very vendors it is intended to reach.

The success of this reform will be measured not simply by how many applications DCWP processes, but by whether longtime vendors—especially those who endured years of exclusion and helped win this change—are able to secure licenses and participate fully in New York City's economy. I urge DCWP to incorporate these recommendations and ensure that implementation fulfills that promise.

Respectfully,

Pierina Sanchez
Council Member, District 14
Lead Sponsor of Local Law 54 of 2026

[Comment attachment](#)

CM-Pierina-Sanchez-DCWP-Hearing-Comment-Street-Vending-License-Waitlist-Proposed-Rule.pdf

Comment added August 17, 2026 4:07pm

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THE COUNCIL
OF
THE CITY OF NEW YORK
PIERINA ANA SANCHEZ

COUNCIL MEMBER, 14TH DISTRICT, BRONX

CHAIR
HOUSING AND BUILDINGS

COMMITTEES
COMBAT HATE
FIRE AND EMERGENCY MANAGEMENT
HOSPITALS
PARKS AND RECREATION
TRANSPORTATION AND INFRASTRUCTURE

Commissioner Samuel A.A. Levine
NYC Department of Consumer and Worker Protection
42 Broadway #5
New York, NY 10004

RE: DCWP Hearing - [Street Vending License Waitlist Proposed Rule to Implement Local Law 54 of 2026](#)

August 17, 2026

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I am encouraged to see DCWP begin implementing this reform, including preserving priority for people on the existing general-vendor waitlist and recognizing vendors already working who never had a fair opportunity to join it. But reforms only matter if the people they were designed to serve can actually benefit.

That is why I am concerned that relying too heavily on self-certification of prior vending activity could allow longtime vendors to be pushed aside. Implementation must include a meaningful, fair process to verify existing vendors and ensure those who endured years of exclusion are not left behind again.

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I strongly recommend DCWP provide meaningful in-person options, including application assistance and secure drop-off locations accessible across all five boroughs because a historic expansion should not be undermined by an application process that excludes the very vendors it is intended to reach.

The success of this reform will be measured not simply by how many applications DCWP processes, but by whether longtime vendors—especially those who endured years of exclusion and helped win this change—are able to secure licenses and participate fully in New York City's economy. I urge DCWP to incorporate these recommendations and ensure that implementation fulfills that promise.

Respectfully,



Pierina Sanchez

Council Member, District 14

Lead Sponsor of Local Law 54 of 2026

- **Nick Gulotta**

Dear Commissioner Levine,

My name is Nick Gulotta and I write as a New Yorker who cares deeply about an equitable small business landscape and as a public servant who has worked on this topic for nearly fifteen years at the City Council and for the Mayor's Office. My comment focuses primarily on Section § 2-319 (e) (2) of the proposed rule:

(2) New prospective applicants requesting to be placed on such new waitlists may certify, in a form and manner as determined by the Commissioner, whether such prospective applicant engaged in vending activity as a general vendor as defined in section 20-452 or as a food vendor as defined in section 17-306 of the Administrative Code at any time between January 29, 2025 and November 2, 2026. Upon request, the applicant may be required to make records available to the Department to establish the accuracy of their certification and show proof of prior vending activity.

I strongly believe and it is clear that our city's street vendors overwhelmingly feel that self-certification to indicate that one has been a vendor would be unfair to longterm vendors. They have expressed that this approach could open the floodgates for people to apply for the waitlist, occupy space, and even receive priority over longterm vendors. Thousands of general vendors have served New Yorkers as they were subjected to excessive enforcement for decades. The City failed these vendors, the overwhelming majority of whom are immigrants who face barriers in the formal economy, by refusing to increase the number of licenses beyond 853. After years of organizing, these vendors recently won the first significant expansion of licenses in 47 years. DCWP should listen to these vendors and honor the spirit of the legislation that they fought for.

The proposed rule does not elaborate on what criteria or proof DCWP will require from vendors to prove they are currently vending. I

recommend that vendors should be able to present the following proofs. Other agencies such as the Human Resources Administration have used a point systems such as the one used by IDNYC to verify identity and residency. Proofs should could include:

- Civil or criminal summonses were received while vending at any point in the past.
- Sales tax filings.
- Receipts of wholesale purchases of their supply and merchandise.
- Signed letters from customers, faith leaders, elected officials, brick-and-mortar businesses, or nonprofit organizations.
- Timestamped pictures of the applicant while vending
- Certificate of Authority to collect sales taxes in NYS.

I also recommend that our city's beloved food vendors should NOT be given priority for General Vendor Licenses for the November waitlist. While important in their own right, merchandise vendors are their own category of small business. I do not know of any other waitlist maintained by city government where another category of applicant would be given priority over those who the program was actually intended for. This would not take place in waitlists maintained by NYC Public Schools, the New York Public Housing Authority, or for civil service exams, and should not take place for General Vendor Licenses.

The proposed rule also increases the fines for violations of Administrative Code sections 20-465(g), 20-465(i), and 20-465(j). I strongly encourage the agency to provide maximum flexibility and direct a "fix-it, don't fine-it" approach. Local Law 54 of 2026 adds new responsibilities for vendors and the expansion of licenses will lead vendors to formalize the businesses they have operated without a license for decades. It would take time and education for anyone to adapt to these changes. This rule should reflect that reality.

Finally, the application and waitlist-enrollment process must account for language justice and limited digital literacy. Communications from DCWP to vendors and the assistance provided should be available in the languages most commonly spoken by vendors. I recommend DCWP provide in-person options and application assistance in all five boroughs.

These are the nuts-and-bolts issues that we must address to truly deliver economic justice to New Yorkers. DCWP has an historic opportunity to demonstrate to the rest of city government what an equitable process that supports working New Yorkers can look like. Thank you for your time and consideration of my recommendations.

Very respectfully,

Nick Gulotta

[Comment attachment](#)

Proposed-General-Vendor-License-Waitlists-Rule.pdf

Comment added August 18, 2026 1:55pm

August, 18, 2026

Commissioner Samuel A.A. Levine
NYC Department of Consumer and Worker Protection (DCWP)
42 Broadway #5
New York, NY 10004

Re: Proposed General Vendor License Waitlists Rule

Dear Commissioner Levine,

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The proposed rule does not elaborate on what criteria or proof DCWP will require from vendors to prove they are currently vending. I recommend that vendors should be able to present the following proofs. Other agencies such as the Human Resources Administration have used a point systems such as the one used by IDNYC to verify identity and residency. Proofs should could include:

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- Receipts of wholesale purchases of their supply and merchandise.
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- Certificate of Authority to collect sales taxes in NYS.

I also recommend that our city's beloved food vendors should **NOT** be given priority for General Vendor Licenses for the November waitlist. While important in their own right, merchandise vendors are their own category of small business. I do not know of any other waitlist maintained by city government where another category of applicant would be given priority over those who the program was actually intended for. This would not take place in waitlists maintained by NYC Public Schools, the New York Public Housing Authority, or for civil service exams, and should not take place for General Vendor Licenses.

The proposed rule also increases the fines for violations of Administrative Code sections 20-465(g), 20-465(i), and 20-465(j). I strongly encourage the agency to provide maximum flexibility and direct a "fix-it, don't fine-it" approach. Local Law 54 of 2026 adds new responsibilities for vendors and the expansion of licenses will lead vendors to formalize the businesses they have maintained without a license for decades. It would take time and education for anyone to adapt to these changes. This rule should reflect that reality.

Finally, the application and waitlist-enrollment process must account for language justice and limited digital literacy. Communications from DCWP to vendors and the assistance provided should be available in the languages most commonly spoken by vendors. I recommend DCWP provide in-person options and application assistance in all five boroughs.

These are the nuts-and-bolts issues that we must address to truly deliver economic justice to New Yorkers. DCWP has an historic opportunity to demonstrate to the rest of city government what an equitable process that supports working New Yorkers can look like. Thank you for your time and consideration of my recommendations.

Very respectfully,



Nick Gulotta

- **'Anonymous'.)**

Greeting's i think order. of this manner has a better way to help us vendor's. keep RESPECT. for ourself's and our work space.[i look forword to see ya'll out there doing good thing's because that's what i'am about.. keeping it real.

Comment added August 19, 2026 8:30am

- **Camilla St.Louis**

Can Permits be set aside for MWBE certified vendors ?

Comment added August 19, 2026 10:22am

- **Ahmed Hassan**

my name's Ahmed Hassan (four years vendor).

I love to work as a vendor to deal with the NYC tourists with friendly and funny way and to give them the best impression about NYC. But I need to work legally by having the street vendor license as hiring a licensed veteran is so expensive .my work doesn't affect the traffic , and taking my stuff by the Sanatation then getting a big ticket is affecting all my life.please allow me to have the license do we can afford the expenses of our life .I have three kids and need this license .I can't work any other job but vending.

thank you

Comment added August 19, 2026 12:29pm

- **Dondi McKellar**

See attached files.

[Comment attachment](#)

Public_Hearing_Testimony_August_19_2026_McKellar.pdf

Comment added August 19, 2026 12:36pm

PUBLIC HEARING TESTIMONY

Understanding the City's Proposed Rule for General Vendor License Waitlists Veteran Street Vendors, Local Law 54, and the Missing Data We Cannot Ignore

August 19, 2026

Good morning, and thank you for the opportunity to testify.

My name is **Dondi McKellar**. I am a disabled United States Navy veteran, a New York City veteran street vendor, and a community advocate. I serve on the **Bronx Borough President's Veterans Advisory Council, representing approximately 30,000 veterans in the Bronx**, and on the **New York City Veterans Advisory Board, representing approximately 205,000 veterans citywide**.

Today I am speaking first as a veteran street vendor.

As the City implements **Local Law 54**, I have a basic question: **How many licensed veteran street vendors do we have today?** How many hold White General Vendor licenses? How many disabled veterans hold Yellow Citywide Specialized licenses? How many hold Blue Midtown Core Specialized licenses?

The City's public information explains eligibility. It confirms that Yellow and Blue licenses are for eligible veterans with service-related disabilities, and that Blue licenses are capped at 105 while Yellow licenses are not numerically capped.^{[3][4]} But I could not find a current public accounting showing how many veteran vendors actually hold each license.

That data gap is unacceptable as Local Law 54 is being implemented.

DCWP states that **10,500 additional General Vendor licenses** will become available beginning January 15, 2027.^[2] If the City is expanding the system by thousands of licenses, it must know and publicly report where veteran vendors stand.

You cannot measure equity without a baseline.

This matters because excessive ticketing can contribute to **blocked license renewal, loss of income, debt, stress, and reduced civic engagement** for disabled veteran vendors.^[6] Behind every missing number is a person trying to remain independent and make an honest living.

I respectfully ask DCWP to **publish current counts for veteran White, Yellow, and Blue license holders; report how many of the 105 Blue licenses are active and how many veterans are waiting; track veteran-license outcomes during Local Law 54 implementation; and create a dedicated Veteran Vendor Navigation pathway** for licensing, renewal, and ticket-related barriers.

I am not asking the City to choose veterans over other vendors. I am asking the City to make veterans **visible in the data, visible in the policy, and visible in the implementation**.

We served our country. We came home. We built businesses. **We are still serving.**

Please do not allow veteran street vendors to disappear somewhere between the law, the waitlist, and the data.

Thank you.

SOURCES & SUPPORTING MATERIALS

Active links for the public record and follow-up review

- [1] NYC Rules - General Vendor License Waitlists (Proposed Rule).
<https://rules.cityofnewyork.us/rule/general-vendor-license-waitlists/>
- [2] NYC Department of Consumer and Worker Protection - Street Vending in NYC.
<https://www.nyc.gov/site/dca/businesses/street-vendors.page>
- [3] NYC Department of Consumer and Worker Protection - Specialized Vending License / Midtown Core Waiting List Application Checklist.
<https://www.nyc.gov/site/dca/businesses/specialized-vending-license-midtown-core-waiting-list.page>
- [4] NYC Department of Sanitation - General Vendor Licensing Law: Educational Highlights and Tips.
<https://www.nyc.gov/assets/dsny/downloads/what-we-do/cleaning/street-vending-enforcement/general-vendor-educational-highlights-tips.pdf>
- [5] NYC Business - General Vendor License.
<https://nyc-business.nyc.gov/nycbusiness/description/general-vendor-license>
- [6] **Submitted Supporting Exhibit:** *The Impact of Excessive Ticketing on Disabled Veteran Street Vendors*. It highlights blocked license renewal, loss of income, a cycle of debt, stress and health burden, and reduced civic engagement.
<https://bronx-veterans-street-vendors.1eyu.gamma.site/>

Data-gap note: The reviewed City sources explain eligibility, license types, caps, and Local Law 54 implementation, but do not provide a current consolidated public count of active veteran General Vendor (White), Citywide Specialized (Yellow), and Midtown Core Specialized (Blue) license holders.

Prepared for the August 19, 2026 public hearing | Web links are embedded and clickable

THE IMPACT OF EXCESSIVE TICKETING ON DISABLED VETERAN STREET VENDORS

Why ticket debt threatens veteran livelihoods, stability, and civic participation in New York City

★ BACKGROUND

At the New York City Council Committee on Veterans hearing on Increasing Veteran Civic Engagement, held on September 18, 2024, at 250 Broadway, 14th Floor, testimony highlighted the harmful effect of excessive ticketing on veteran street vendors. Many disabled veteran vendors are unable to renew their street vending licenses because of outstanding tickets, creating a cycle of financial hardship and legal complications.

★ KEY IMPACTS



1. Blocked License Renewal – unpaid tickets can prevent disabled veteran vendors from renewing their licenses and continuing to work.



2. Loss of Income – repeated fines reduce already limited earnings and threaten economic stability.



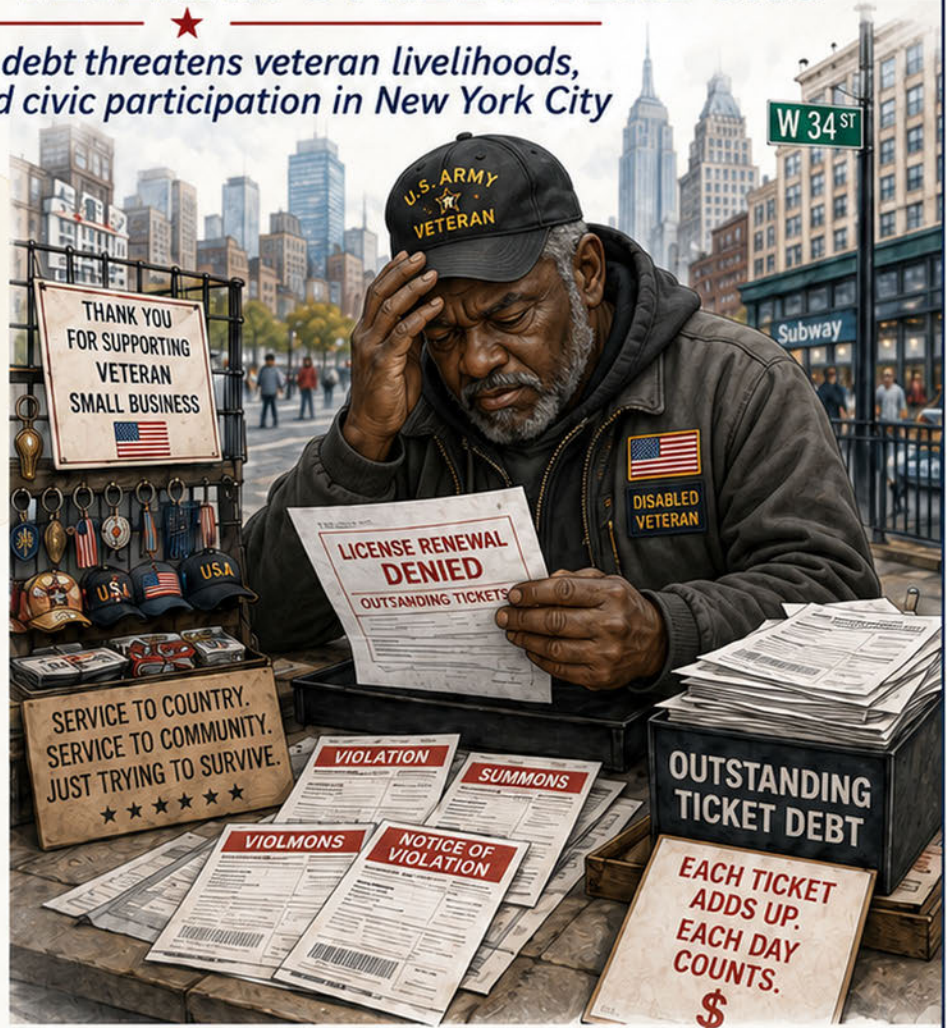
3. Cycle of Debt – ticket debt compounds over time, making it harder to recover financially.



4. Stress and Health Burden – legal pressure and financial strain can worsen disability-related and mental health challenges.



5. Reduced Civic Engagement – when survival needs come first, participation in community life and civic processes becomes harder.



★ WHY THIS MATTERS



Veteran street vendors have served their country and continue to serve their communities. Excessive enforcement can push disabled veterans deeper into hardship instead of supporting self-sufficiency, dignity, and stability.

★ A SOLUTION-BASED APPROACH



Targeted ticket relief or amnesty for eligible disabled veteran vendors



License-renewal assistance and case management support



Policy reforms that balance enforcement with economic justice and veteran well-being



VIEW DONDI'S SLIDE PRESENTATION

<https://bronx-veterans-street-vendors-gamma.site/>



- **NYC Council Member Amanda Farías**

Wednesday, August 19, 2026

Good Afternoon,

I want to thank the Department of Consumer and Worker Protection for holding this public hearing, working with the City Council through the passage of the Street Vendor Reform Package to this day, and hearing testimony on these critical rules related to vending. I look forward to the completion of the rule-making process, the installation of new systems within the reformed street vendor licensing framework, and the rollout of new licenses for the first time in decades that will bring vendors into compliance while simultaneously fixing our broken and neglected system.

In New York City, there are over 23,000 Vendors that serve their fellow community members, neighbors, and the tourists visiting this city. They serve us, increase economic activity, and foster the culture that makes this city thrive while creating jobs, bringing neighborhoods together, and serving as an integral part of this city's fabric.

However, because of the city's bureaucracy and outdated caps on licenses set in the 1970s that prevented growth alongside the city's rising population, thousands of vendors were forced into an underground and unregulated economy, targeted by city enforcement, and, occasionally, confronted with criminal charges in a system they could not escape from. The former system prevented compliance, while the new system will bring about compliance, regulation, and a workable system for the city and street vendors to operate within.

The proposed rulemaking follows the spirit of the Street Vendor Package by creating the structures to expand general vending licensing while ensuring that those who have fairly waited their turn have access to those new licenses.

The proposed rules allow individuals who have applied and have waited for years, in order of their applications, to receive a license first, followed by those who are currently vending during the application period from November 2 to December 16, 2026. This process, giving primacy to those who have been waiting and are currently vending, both follows the spirit of Local Law 54 of 2026 and allows those individuals, acting in good faith and who have been waiting for years, to escape the legal and administrative limbo of the former system that hurt thousands of New Yorkers. Then, following these two groups, any new applicant can apply and, subject to the waitlist, receive a license.

With this rulemaking, the old general vending structure will be gone and, with the new Division of Street Vendor Assistance within the Department of Small Business Services and enforcement tied to vending, the new system will be robust, compliance-based, fair, and up-to-date with the current realities of our city rather than the 1970s.

Though there is still more work to be done, from rollout to managing enforcement within the new system, this is a major step towards correcting the injustices and systemic incongruencies that New York City Vendors have faced for decades. This new system will ensure that those good-faith, compliant vendors within New York City will be able to work, strive, prosper, and succeed while strengthening the city's economy, adding to the New York experience, and enriching our streets for the benefit of all New Yorkers and anyone who wishes to visit our great city.

Respectfully Submitted,

Hon. Amanda Farías
Council Member, District 18
New York City Council

[Comment attachment](#)

08.19.26-CM-Farias-Dept-Consumer-Worker-Protection-Hearing-Testimony.pdf

Comment added August 19, 2026 4:10pm

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THE CITY OF NEW YORK
AMANDA FARÍAS
COUNCIL MEMBER, 18TH DISTRICT, BRONX

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ZONING AND FRANCHISES

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Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Amanda Farías", written in a cursive style.

Hon. Amanda Farías
Council Member, District 18
New York City Council