

**Written Public Comments Submitted to the Department of Finance  
Amendment of Rules Relating to Stipulated Fine and Commercial Abatement  
Programs.**

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**If you would like to review the original submission of any comment, including  
attachments, please email [dofrules@finance.nyc.gov](mailto:dofrules@finance.nyc.gov)**

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**1. Daniel Bersohn – 1/7/2026 – NYC Rules Webpage**

While I support the revenue and enforcement cost mitigation goals of this program and the automatic enforcement of unmitigated fines for stipulated violations in the event of a business' failure to timely pay the stipulated fine, I have serious fairness concerns when comparing the fine collection practice for businesses as opposed to individuals. The availability of the stipulated fine program for businesses without a corresponding program for individuals is inconsistent with my understanding of notions of fairness and economic justice embraced by the Mayor.

A parallel stipulated fine program should be established for individuals who are NYC tax residents perhaps with sliding scale fines based on prior tax year income (simple SSN/TIN lookup and formula based on NYC taxes paid so all records required to enforce are City owned). Fines for some violations (like red light and speed cameras) are probably not deterrent for higher income individuals while parking fines may be disastrous for lower income individuals.

Alternatively, other jurisdictions (for example London, UK; Toronto, ON) include video and/or photo evidence in parking violations to limit the ability of violators to challenge tickets. Parking agents already carry smartphones, so it should be simple enough to include photo, video and GPS capture in writing violations and use that data to automate filling out the violation based on things like GIS data about parking restrictions and image recognition for number plates, vehicle make/model/color, etc. In this connection, City issued parking permits should be electronically associated with number plates rather than physical. In this case if a traffic agent attempts to write a violation that is covered by the permit attached to the time and location of the number plate, the ticket issuing system would simply throw an error. If the permit doesn't apply to the violation observed, the vehicle would get the appropriate ticket. This would ensure fair enforcement against all violators (commercial, City employee, and individuals).

**2. Zach Miller – 1/28/2026 – NYC Rules Webpage**

Good morning and thank you for the opportunity to share testimony. My name is Zach Miller, and I am the Vice President of Government Affairs for the Trucking Association of New York. Since 1932, TANY has advocated on behalf of the trucking industry at all levels of government, providing compliance assistance, safety programs, and educational opportunities to our members, and in the process,

creating jobs, supporting the economy, driving safety, and delivering a sustainable future.

Our association represents motor carriers, private fleets, and businesses of all sizes that rely on trucks to make deliveries, perform service calls, and support New York City's economy. Many of our members are enrolled in the Fleet Program and rely on the stipulated fine and commercial abatement frameworks to manage compliance in an efficient and predictable manner.

At the outset, we want to express our support for several key aspects of the proposed rule.

#### Support for Codifying Existing Policy:

We support the Department's effort to codify existing policies regarding late payments and the consequences associated with failure to pay reduced fines within established timeframes. Providing this clarity directly in the rules improves transparency, predictability, and understanding for program participants. Codification will help ensure that expectations are clear and uniformly applied, which benefits both regulated businesses and NYC.

#### Support for Bulk Settlement Authority:

We also strongly support the proposed authority allowing for retroactive bulk settlement agreements under both the Stipulated Fine Program and the Commercial Abatement Program. This provision represents a meaningful improvement to the program structure and offers a practical, efficient mechanism for resolving large volumes of outstanding violations.

From our perspective, this authority is a true win-win: it allows fleets to resolve legacy violations in an orderly manner while reducing adjudication burdens and docket congestion at the Parking Violations Bureau. We view this as a constructive evolution of the program that strengthens its original purpose.

#### Concern Regarding Impacts on Small and Mid-Size Fleets:

Our concern lies not with the intent of the rule, but with its potential unintended impact on smaller and mid-size operators enrolled in these programs.

For these fleets, minor payment delays, often caused by cash-flow volatility, administrative backlogs, or payment processing issues, can result in the sudden

loss of reduced fines and a rapid escalation to full penalties. Unlike very 3 Corporate Drive, Suite 101 Clifton Park, NY 12065 P 518.458.9696 nytrucks.org large fleets, smaller operators often lack dedicated compliance staff or the financial flexibility to absorb abrupt cost increases.

We are concerned that, as structured, the rule may inadvertently create a two-tier compliance system based primarily on fleet size: one in which large fleets benefit from enhanced settlement tools and administrative capacity, while smaller fleets face heightened financial risk from minor or short-term disruptions.

Recommendation:

We respectfully encourage the Department to consider additional safeguards or flexibility for small and mid-size fleets, such as limited cure periods, graduated responses to late payment, or targeted administrative discretion. These measures would preserve the integrity of the programs while ensuring they remain accessible and workable for businesses of all sizes.

We commend the Department for strengthening and modernizing these programs and for pursuing reforms that benefit both New York City and the trucking industry which keeps our economy moving. With modest adjustments to address the realities faced by smaller operators, these amendments can continue to function as a balanced, effective, and equitable compliance framework.

Thank you for the opportunity to comment. As always, the Trucking Association of New York looks forward to ongoing collaboration and dialogue with the Department of Finance.

### **3. Assemblyman Jeffrey Dinowitz – 1/29/2026 –NYC Rules Webpage & Email**

Dearing Acting Commissioner Shear:

I write to request that DOF suspend proposed rule-making for the below:

Proposed Rule: The New York City Department of Finance (“DOF”) is proposing amendments to rules to allow stipulations under the Stipulated Fine Program and the Commercial Abatement Program for time periods preceding the date of the agreement and to clarify policies relating to late payments under such programs.

I ask DOF to suspend its rule making because neither my office, nor our community boards, were advised of these proposed changes which will no doubt increase double parking and slow down the buses our citizens need in are community – which already lacks sufficient mass transportation options. This proposed rule expands illegally double parking of large vehicles, creating obstacles to all vehicles, and will not help produce Free and Fast Buses that I support along with the administration.

I do request that DOF remove all discounts for alleged double parking infractions until such time the state, or the council approves such changes, as discounting fines for blocking traffic while double parking, for hours on end, causes many problems, not the least of which is to block access to Access-A-Ride Vehicles, preventing our citizens with vision and other impairments yet another obstacle to transportation they depend upon to see their doctors and get to work. The program represents a double-standard, where the largest offenders receive millions in discounts, while public housing needs, and funding for victims of domestic violence do not appear satisfied under NYS VTL 1809-a. The program is in contrast to what we as New Yorkers hold dear to their hearts: fairness and accountability.

I also request that DOF allow businesses who are eligible for live, in-person virtual video hearings, to be able to switch them to live, in-person hearings, and in the alternative, especially when there is inclement weather – like we had this week. Failing to do so appears an unnecessary burden to the public and business community that DOF can and should easily relieve

I am happy to work with DOF to facilitate the necessary hearings, and discussions. Please confirm that all rule-making concerning any discount program be held in abeyance

Thank you for your cooperation in this important matter, and please let me know when we can meet.

Sincerely,  
Jeffrey Dinowitz  
Member of New York State Assembly

#### **4. Glen Bolofsky – 2/2/2026 –NYC Rules Webpage**

Opposed.

DOF policy concerning discounts for illegal behavior, where vehicles double park all day, and receive discounts for doing so under the stipulated fine program and/or commercial abatement program is contrary to good government. Nobody needs to have a higher level education to know that a double-parked vehicle that doesn't move for hours on end creates obstacles to safe public streets, and disturbs transportation policy, which as the Mayor explains, is to move our buses faster. We ask DOF how this program will move our buses faster – and to address that in its rule-making.

DOF wants a quick and steady cash flow, which we appreciate but, it doesn't weigh the cost. The costs are significant.

(1) Public Safety: the programs create physical obstacles to everyone using our streets and curbs; including individuals with disabilities. The program causes these problems – which are indeed life and death safety issues – by allowing vehicles to double park all day, blocking pedestrian, bicyclist, and driver views as to what's around them. It impedes traffic, and blocks Access-A-Ride vehicles access to the curb. Safety ALWAYS comes first but, not here.

(2) NYC Council: DOF is aware that the NYC Council rejected Intro 0637-2017 where it sought Council approval for these programs. That decision stands. We refer DOF to the transcripts of the final hearings on the matter as shown on the NYC Council website.

(3) Robbing the Poor & Needy: The program(s) rob money from victims of domestic violence, as NYS VTL 1809-a requires a \$15- mandatory surcharge to be collected for each ticket paid. and given to the crime victims assistance units. DOF is deficient in giving this money, earmarked, by law to victims of crime, who suffer needlessly. Their children, and extended families also suffer greatly. This is bad public policy and any agency that doesn't see that is not managed well.

(4) The program(s) lend themselves to abuse by creating a serious adjudication dilemma as DOF seeks to artificially keep the number of tickets it dismissed as low

as possible, by blocking the presentation of documents at commercial hearings, and legally opposes a company's use of an affirmation as opposed to requiring a notarized affidavit.

**5. Glen Bolofsky – 2/2/2026 –NYC Rules Webpage**

Please note that my comment inadvertently references NYC Council Intro 0637-2017 however, the correct year is 2007.

Thank you and please post.