

**Written Public Comments Submitted to the Department of Finance
Amendment of Rules Relating to Speed Cameras and the Weigh-in-Motion Violation
Monitoring System.**

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

1. Brandon Chamberlin - 3/16/2026 – NYC Rules Webpage

I strongly support the proposed rule. New York City should deploy automated traffic enforcement to the fullest extent authorized by state law.

2. S - 3/25/2026 – NYC Rules Webpage

While I agree that vehicles should slow down in work areas, I see nothing mandating work area signage with speed restrictions posted well in advance of work areas so motorists can obey law.

3. Angel Espindola - 3/28/2026 – NYC Rules Webpage

Executive Summary

Proposal: Amendment to NYC Rules regarding 15 mph speed limits and expanded Weigh-In-Motion (WIM) enforcement.

Position: Strong Opposition.

Key Risks:

Traffic Volatility: Artificial speed floors increase “speed variance,” leading to a higher frequency of rear-end collisions and erratic driving.

Supply Chain Inflation: Reducing transit velocity to 15 mph creates a 40% efficiency loss for logistics, which will be passed on to NYC consumers as higher prices.

Environmental Degradation: Forcing vehicles to operate at 15 mph increases “stop-and-go” cycles, leading to higher fuel consumption and localized emissions compared to steady-state cruising at 25 mph.

Enforcement Inaccuracy: WIM systems are prone to “dynamic load” errors on poorly maintained NYC streets, resulting in unjust fines for the trucking industry.

From Attachment Memorandum_of_Opposition:

MEMORANDUM OF OPPOSITION

TO: New York City Department of Transportation

FROM: [Your Name/Organization]

DATE: October 26, 2023

RE: Formal Objection to Proposed 15 MPH Speed Limits and Automated Enforcement Expansion

I. OVERVIEW

This memorandum outlines the critical flaws in the proposed rule changes. While the intent is to enhance public safety, the implementation of a 15 mph speed limit—a speed barely faster than a focused cyclist—will have a net negative impact on New York City’s safety, economy, and air quality.

II. SAFETY CONCERNS: THE DANGER OF SPEED VARIANCE

Setting speed limits significantly below the design speed of a road creates "speed variance."

- Increased Collisions: When some drivers adhere to a 15 mph limit while others maintain a more natural 25 mph flow, the closing speed between vehicles creates "friction." This leads to a documented increase in rear-end collisions.

- The "Speed Camera" Reflex: Drivers often brake abruptly when approaching automated cameras, even if they are traveling at a safe speed. At a 15 mph threshold, the margin for error is so small that "panic braking" will become a common occurrence, endangering following motorists and cyclists.

III. ECONOMIC IMPACT: THE SLOWDOWN TAX

NYC is the logistical heart of the Northeast. Forcing the movement of goods to a 15 mph crawl is an economic barrier.

- Productivity Loss: A delivery truck that could previously make 20 stops in a shift may now only make 12 due to reduced transit velocity.

- Increased Costs: To maintain current service levels, companies will require more trucks and more drivers on the road for longer hours, directly increasing the cost of groceries, medicine, and consumer goods for all New Yorkers.

IV. ENVIRONMENTAL FALLACY

It is a mechanical reality that internal combustion engines are least efficient at low speeds.

- Incomplete Combustion: Operating at 15 mph often keeps engines in lower gears

with higher RPMs relative to speed, leading to higher tailpipe emissions.

- Prolonged Exposure: By slowing traffic, the city ensures that vehicles spend more time idling and moving through neighborhoods, increasing the total duration of pollutant exposure for residents.

V. WIM ENFORCEMENT AND INFRASTRUCTURE REALITIES

The expansion of Weigh-In-Motion (WIM) systems ignores the current state of NYC roads.

- Technical Error Margin: WIM sensors measure "dynamic weight." If a truck hits a pothole—a frequent occurrence in NYC—the sensor registers a massive, momentary spike in weight that does not reflect the vehicle's actual mass.

- Unfair Penalties: This results in automated citations for "overweight" violations that are actually the result of poor road maintenance by the city itself.

VI. CONCLUSION

The proposed 15 mph limit is an over-correction that prioritizes automated revenue over functional urban mobility. We urge the Department of Transportation to focus on proven safety measures, such as protected intersections and signal synchronization, rather than blanket speed reductions that will cripple the city's efficiency.

4. **Peter M. Mazer - Metropolitan Taxicab Board of Trade – 4/9/2026 – Email**

Good morning. My name is Peter Mazer, General Counsel to the Metropolitan Taxicab Board of Trade, a seventy-four year old association representing the owners and operators of licensed New York City medallion taxicabs. New York City cabs provide safe, reliable, accessible on demand transportation to hundreds of thousands of New York City residents and visitors every day. Driving or owning a taxicab furnishes many New Yorkers with opportunities to better themselves and provide for their families.

This morning I wish to address proposed amendments to the Rules of the City of New York, specifically the proposed new Title 19, Section 39-25(a) of the Rules of the City of New York. This section would establish monetary penalties imposed

upon the owners of vehicles who exceed posted speed limits in construction areas monitored by cameras. Graduated penalties would be imposed: \$50.00 for the first violation within an eighteen-month period; \$75.00 for the second violation; and \$100.00 for the third and each successive violation.

Graduated penalties make sense when the offender is the owner-operator of a vehicle and can serve as deterrent to repeat offenders. However, in the case of taxicabs, many of the vehicles are leased-often to different drivers each day. Typically, the leased driver is responsible for paying any parking or other fines accrued against the vehicle during the driver's shift pursuant to state law, TLC rules and the agreement between owner and driver. The penalty imposed would be based upon the number of times a particular vehicle has been cited, rather than the number of times an individual driver has engaged in misconduct. For example, a vehicle may have been cited two previous times for a construction zone speed camera violation. A new driver assigned to the vehicle may thereafter commit an offense; his or her first, but face a \$100 fine simply because the vehicle, operated by other drivers, had been previously cited. Such a penalty is unfair to this driver and serves no deterrent effect with respect to this driver, as intended by the rules.

We urge the Department of Finance to consider changes to the penalty section of this proposed rule to address the problem faced by taxicab drivers, as well as other leased vehicle drivers, who may be subject to disproportionate penalties because of the misconduct of other drivers. We submit that with respect to leased vehicles, penalties for any violation should be the same as for a first offense so as to not unfairly penalize leased drivers for the prior misconduct of others.

Thank you for providing me with the opportunity to speak this morning.

5. Zach Miller - Trucking Association of New York – 4/9/2026 – Email

My name is Zach Miller, 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.

TANY represents trucking companies of all sizes that are responsible for the safe and efficient movement of goods throughout New York State, including the

approximately 96 percent of freight that moves by truck in New York City. Our members are committed to safety, regulatory compliance, and continuous investment in modern equipment and training. We appreciate the City's focus on work zone safety and recognize the importance of protecting both roadway workers and the traveling public.

We absolutely believe that enforcement is an important tool in the toolbox and support the need to protect work and construction zone workers as well as our infrastructure. We do not object to the utilization of camera enforcement to meet these objectives but we do have concerns regarding the structure, implementation, and potential unintended consequences of the proposed rule.

1. Due Process and Adjudication Concerns

The proposed rule relies on automated enforcement mechanisms that impose liability on vehicle owners without requiring identification of the driver or operator and in the case of WIM, consideration of context. While we understand that this framework is authorized under state law, the expansion of such systems raises important due process considerations.

Adjudication through the Parking Violations Bureau (PVB), a high-volume administrative forum, limits the ability of respondents to meaningfully challenge violations. There is no clear mechanism for accessing underlying evidence such as device calibration records, maintenance logs, or situational data that may be relevant to a defense. As a result, the burden is effectively shifted onto the owner to disprove a violation generated by an automated system.

We respectfully urge the Department to incorporate additional procedural safeguards, including:

- Enhanced transparency regarding enforcement technology and calibration;
- Clear access to evidentiary materials necessary to contest a violation; and
- Strengthened appeal rights to ensure fair and meaningful review.

Although the rule applies broadly, its impact will fall disproportionately on commercial vehicle owners who are often times neither the operating entity nor the employer of said entity.

Additionally, commercial vehicles require longer stopping distances and may face operational constraints that differ significantly from passenger vehicles. A uniform penalty structure that does not account for these realities risks creating inequitable outcomes and frankly, a lost opportunity to change behavior which is the most important goal. A truck owner that had no oversight of the operator creating an unsafe condition in a work zone is not the entity that ought to be punished. There must be a mechanism to transfer that liability to the operator.

We encourage the Department to consider:

- The operational characteristics of commercial vehicles; and
- Opportunities to tailor enforcement or penalty structures accordingly.

2. Interaction with Weigh-in-Motion (WIM) Enforcement

The proposed amendment clarifies that the PVB will adjudicate WIM violations occurring within New York City. While we appreciate this clarification, it underscores the increasing reliance on automated enforcement systems across multiple dimensions—speed and weight.

Without corresponding reforms to the City’s overweight permit system or alignment with state standards, this layered enforcement approach risks compounding penalties without addressing underlying regulatory inconsistencies. We encourage the City to pursue a more holistic approach that balances enforcement with modernization of the permitting framework.

3. Need for Transparency and Data Reporting

To ensure that this program achieves its stated safety goals, it is essential that the City provide regular, publicly available reporting on:

- Violation rates;
- Geographic distribution of enforcement;
- Safety outcomes, including reductions in crashes or injuries; and
- Impacts on different vehicle classes.

Transparency will help build trust in the program and allow stakeholders to evaluate its effectiveness.

TANY and our members share the City's commitment to improving roadway safety and we believe the proposed rule would benefit from additional safeguards to ensure fairness, transparency and a culture of compliance.

We respectfully request that the Department consider the recommendations outlined above and engage with stakeholders to refine the rule in a manner that achieves safety objectives without imposing undue burdens on the industry.

As always, the Trucking Association of New York looks forward to continued collaboration and dialogue with the City of New York.

Thank you for your time and consideration.

6. April McIver, Esq – Plumbing Foundation City of New York – 4/10/2026

I write to you on behalf of The Plumbing Foundation City of New York, Inc. (PFCNY). PFCNY was founded in 1986 and is a non-profit organization of small and large, union and non-union licensed plumbing contractors, engineering associations, wholesalers, and manufacturers whose mission is to protect the public health and safety of New York City through the enactment and enforcement of safe plumbing codes.

Thank you for the opportunity to comment on the Proposed Rules Concerning Speed Cameras and the Weigh-in-Motion Violation Monitoring System. The New York City Department of Finance ("DOF") proposed rules amend the highway construction or maintenance work area speed photo violation monitoring program to enforce state laws against exceeding posted maximum speed limits in highway construction or maintenance work areas. These rules will establish the fines and penalties for such violations, provide requirements for the notice of liability that will be sent to motorists by certain agencies and authorize the Parking Violations Bureau ("PVB"), a division of DOF, to adjudicate allegations of liability.

We commend our elected officials and City agencies for taking safety of construction zones seriously and exploring ways to disincentivize reckless behavior that can be dangerous and lead to serious injuries and/or death. As part of the construction industry, we understand the importance of keeping workers safe.

While the Plumbing Foundation is aware that state law authorizes the expansion of the programs under these rules, this does seem to raise important due process

considerations. For example, adjudication through the high-volume PVB administrative forum hinders respondents' ability to meaningfully challenge violations. Without a clear mechanism to access underlying evidence, like calibration or maintenance records, the burden shifts to the owner to disprove the automated violation. We urge the Department to incorporate safeguards: enhanced transparency on enforcement technology and calibration, clear access to necessary evidence, and strengthened appeal rights for fair review.

Additionally, since NYC Licensed Master Plumbers are business owners and many have fleets of commercial vehicles, this rule is concerning. Although the rule applies broadly, its impact will fall disproportionately on commercial vehicle owners who are oftentimes not operators of their vehicles. A licensed master plumber who had no oversight of the operator, i.e., an employee, creating an unsafe condition in a work zone is not the entity that ought to be punished. There must be a mechanism to transfer that liability to the operator.

The proposed amendment clarifies that the PVB will adjudicate WIM violations occurring within New York City. While we appreciate this clarification, it underscores the increasing reliance on automated enforcement systems across multiple dimensions—speed and weight. Without corresponding reforms to the City's overweight permit system or alignment with state standards, this layered enforcement approach risks compounding penalties without addressing underlying regulatory inconsistencies. We encourage the City to pursue a more holistic approach that balances enforcement with modernization of the permitting framework.

To ensure that this program achieves its stated safety goals, it is essential that the City provide regular, publicly available reporting on: violation rates; geographic distribution of enforcement; safety outcomes, including reductions in crashes or injuries, and impacts on different vehicle classes. Transparency will help build trust in the program and allow stakeholders to evaluate its effectiveness.

Thank you for the opportunity to comment. Please do not hesitate to contact me for any reason.