

NEW YORK CITY TAXI AND LIMOUSINE COMMISSION

Notice of Promulgation

Notice is hereby given in accordance with section 1043(f) of the New York City Charter (“Charter”) that the Taxi and Limousine Commission (“TLC”) promulgates rules that govern the ways in which a non-accessible vehicle can be converted to a Wheelchair Accessible Vehicle.

The rule is promulgated pursuant to sections 1043 and 2303 of the Charter and section 19-503 of the Administrative Code of the City of New York. This rule was published in the City Record on July 29, 2025 for public comment. On September 3, 2025 a public hearing was held virtually by the TLC, and the rule was adopted by the Commission on * _____.*

Statement of Basis and Purpose

TLC is adopting changes to its rules to update the modification process that vehicle converters can use when converting a non-accessible vehicle to a Wheelchair Accessible Vehicle (“WAV”) for use as a Taxicab or as a For-Hire Vehicle.

The specifications for converting accessible vehicles are currently structured in a way that contemplates a different set of standards according to whether the entity performing the vehicle modification is: 1) a secondary manufacturer, or 2) some entity other than a secondary manufacturer. This distinction is confusing and not required by TLC’s standards of conversion— all vehicles need to be converted using the same standards.

This rule package simplifies the structure of the rules governing conversion and in doing so makes them easier to understand, easier to explain to companies capable of performing vehicle conversions, and easier to enforce.

This rule package is also designed to promote competition among private entities that may wish to perform vehicle conversions in the for-hire market in New York City. TLC rules currently allow for vehicle manufacturers approved by the National Highway Traffic Safety Administration (NHTSA) to perform non-accessible vehicle conversions. This rule change allows NHTSA-approved vehicle modifiers to perform conversions, in addition to vehicle manufacturers.

By expanding the playing field of potential market entrants, and by promoting competition through clear guidance and enforceable standards, the TLC hopes, in light of the size of the New York City market, to allow for greater options for vehicle owners seeking to convert non-accessible vehicles to WAVs—both here in New York City and elsewhere.

TLC received written and oral comments on this rule proposal as part of the September 3, 2025 public hearing. TLC has not made any changes to the rule based upon the comments that were received.

TLC received feedback from disability advocates and advocacy groups, such as Disabled in Action and the Center for Independence of the Disabled, requesting that all taxis be required to

be manufactured as accessible vehicles direct from the manufacturer. While these comments are certainly related to accessibility, the current rule accepts as a starting point that non-accessible vehicles are allowed to be converted into accessible vehicles, and that standards are needed for such conversion. This request from disability advocates would perhaps be a topic for future discussion.

Disability advocates have also expressed concern related to the type of safety belt used to harness accessible passengers. Specifically, the advocate groups have requested that TLC require the utilization of an integrated Q-strait seatbelt solution, which is an “all-in-one” harness permanently attached to the frame of the vehicle, instead of the 4-point Q-strait that is currently utilized. TLC acknowledges the advocates’ concerns, but this change would result in significant cost for vehicle owners. Additionally, it would necessitate ongoing communication with industry converters and the completion of crash test studies, delaying implementation of the rule significantly. TLC is certainly open to future dialogue regarding this proposal.

Advanced Mobility Technologies (AMT), one of the industry vehicle converters, also provided testimony regarding section 59C-04(c)(16) of TLC’s Rules. This provision is not among those being amended by this rule. However, AMT has requested that TLC consider amending the language for this provision. The existing provision requires that the converted vehicle be purchased from the same converter that has manufactured the necessary parts/components and provided the labor to convert the vehicle. AMT’s proposed change to the provision would allow accessible vehicle modifiers to convert vehicles without supplying the vehicle for the conversion. The TLC is concerned that permitting this would facilitate “white labeling” whereby a vehicle modifier acquires the vehicles from the manufacturer but sells the converted vehicle under the modifier’s brand name, a practice which could give rise to confusion and misrepresentation.

Lastly, TLC received and reviewed public comments from a driver advocate regarding the warranty of accessible vehicles once they are converted. The comment expressed a concern that the warranty provided by the accessible vehicle converter is not as extensive as the original manufacturer warranty provided to the owner before the vehicle has been converted. To TLC’s knowledge, reputable converters already provide the warranty coverage provided by the original manufacturer, as well as a separate warranty for the conversion.

TLC’s authority for these rules is found in sections 1043 and 2303 of the New York City Charter and sections 19-503 and 19-549 of the New York City Administrative Code.

New material is underlined.

[Material inside brackets indicates deleted material.]

Section 1. Paragraph (4) of subdivision (b) of section 59C-04 of Title 35 of the Rules of the City of New York is amended to read as follows:

(4) Exception regarding bumpers: A bumper modified to allow installation of a rear-entry ramp may be approved if it satisfies either of the following:

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- (i) Modification by secondary manufacturer:
 - a. The rear bumper is reinforced.
 - b. The modification is approved by the vehicle manufacturer.
 - c. The modification meets or exceeds Federal Motor Vehicle Safety Standards crash testing requirements.
 - d. Any rear door lock modifications must meet the Federal Motor Vehicle Safety Standards and the lock must be attached to the chassis, not the ramp, unless a secondary lock is attached to the chassis.
- (ii) Modification by other than secondary manufacturer:
 - a. The rear bumper is reinforced.
 - b. The modification is approved by the vehicle manufacturer.
 - c. The modification meets or exceeds Federal Motor Vehicle Safety Standards crash testing requirements.
 - d. The modifier must retain an engineer with at least a bachelors degree in either mechanical engineering or electrical engineering with at least 3 years' experience in automotive manufacturing to certify that each vehicle was modified using the design tested to meet or exceed Federal Motor Vehicle Safety Standards crash testing requirements.
 - e. A separate certification from such engineer for each vehicle must be presented to the TLC indicating that the requirements set forth in items a through c of this subparagraph have been met.
 - f. Any rear door lock modifications must meet the Federal Motor Vehicle Safety Standards and the lock must be attached to the chassis, not the ramp, unless a secondary lock is attached to the chassis.

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- i. The rear bumper is reinforced.
- ii. The modification meets or exceeds Federal Motor Vehicle Safety Standards crash testing requirements.
- iii. Any rear door lock modifications must meet the Federal Motor Vehicle Safety Standards and the lock must be attached to the chassis, not the ramp, unless a secondary lock is attached to the chassis.
- iv. The modifier must retain an engineer with a bachelor's degree in mechanical engineering with at least 3 years of experience in automotive manufacturing to certify that each vehicle was modified using the design tested to meet or exceed Federal Motor Vehicle Safety Standards.
- v. Separate certification for each vehicle must be presented when the vehicle is submitted to TLC as a Wheelchair Accessible Vehicle.

Section 2. Subdivision (c) of section 59C-04 of Title 35 of the Rules of the City of New York is amended to read as follows:

- (c) The Accessible Vehicle, as manufactured by the original equipment manufacturer (“OEM”) or as modified by a[n OEM- approved or] National Highway Traffic Safety Administration (“NHTSA”)-registered second stage manufacturer (or vehicle modifier), must meet all applicable Americans with Disability Act specifications as required for Wheelchair Accessible Vehicles, as well as the following specifications:

(1) The minimum ground clearance (measured from frame, loaded to gross vehicle weight rating) must be 5 inches.

(2) (i) The passenger compartment length (measured from rear of driver’s seat base to rear seat base) must be not less than 56 inches.

(ii) Exception: For an Accessible [Taxicab] Vehicle designed to carry a Passenger using a wheelchair in the front right position beside the Driver, the passenger compartment length must be not less than 38 inches.

(3) The rear compartment of any vehicle approved for use as an Accessible Vehicle Model must meet the following dimensions as defined by the Society of Automotive Engineers:

(i) Effective legroom (L51) must be at least 34.6 inches.

(4) The front compartment of any vehicle approved for use as an Accessible Vehicle Model must meet the following dimensions:

(i) Effective legroom (L34) must be at least 40 inches.

(5) Total legroom (the sum of L34 and L51) must be at least 74.6 inches.

(6) [The] Where a Wheelchair Accessible Vehicle is modified using a side entry conversion, the original floor of the Accessible Vehicle, if lowered, must be lowered from the base of the firewall to the area immediately in front of the rear axle.

(7) If a lowered floor assembly is used[, it] in the process of converting a vehicle to a Wheelchair Accessible Vehicle, the lowered floor must be stainless steel (16 gauge minimum) or the equivalent [and must meet or exceed the 1,000 hour salt spray rating].

(8) [If a lowered floor assembly is used, a vapor-insulating barrier of ½ inch marine grade plywood] Sound-deadening material must be applied over the lowered metal floor and thoroughly secured.

(9) The wheelchair ramp must not [block any part of the door or glass] obstruct the drivers’ rearview sight while in the stowed position.

(10) The system provided to securely hold one or more wheelchairs in place must be the system known as Q straint QRT Standard or, if an alternative system, it must meet or exceed the Q straint QRT Standard.

(11) No anchor points may project more than 1/8 of an inch above the finished floor.

(12) If the Accessible Vehicle has a middle fold-up passenger seat, it must have a folding mechanism and base plate and must meet the requirements of the Federal Motor Vehicle Safety Standard No. 207, Code of Federal Regulations, title 49, and section 571.207.

(13) Any modifications to the rear air conditioning must be approved by the OEM.

(14) Any and all electrical wiring, other than as provided by the OEM, must be PVC-or-better insulated and color-coded for positive identification.

(15) The back-up alarm must be an electrically operated device that produces an intermittent audible signal when the Accessible Vehicle's transmission is shifted into reverse.

(16) The converted vehicle must be purchased from the same converter which has manufactured the necessary parts/components and provided the labor to convert the vehicle.

(17) Conversion of a vehicle with a salvage title certificate, as identified by a relevant State Department of Motor Vehicles, is prohibited.

(18) All approved Wheelchair Accessible Vehicles, whether modified or not, must meet all applicable federal and state emissions requirements and standards.

Section 3. Paragraph (4) of subdivision (b) of section 67-05.2 of Title 35 of the Rules of the City of New York is amended to read as follows:

(4) *Exception regarding bumpers:* A bumper modified to allow installation of a rear-entry ramp may be approved if it satisfies either of the following:

- [(i) *Modification by secondary manufacturer:*
- a. The rear bumper is reinforced.
 - b. The modification is approved by the vehicle manufacturer.
 - c. The modification meets or exceeds Federal Motor Vehicle Safety Standards crash testing requirements.
 - d. Any rear door lock modifications must meet the Federal Motor Vehicle Safety Standards and the lock must be attached to the

chassis, not the ramp, unless a secondary lock is attached to the chassis.

(ii) *Modification by other than secondary manufacturer:*

- a. The rear bumper is reinforced.
- b. The modification is approved by the vehicle manufacturer.
- c. The modification meets or exceeds Federal Motor Vehicle Safety Standards crash testing requirements.
- d. The modifier must retain an engineer with at least a bachelors degree in either mechanical engineering or electrical engineering with at least 3 years' experience in automotive manufacturing to certify that each vehicle was modified using the design tested to meet or exceed Federal Motor Vehicle Safety Standards crash testing requirements.
- e. A separate certification from such engineer for each vehicle must be presented when the vehicle is submitted for Hack-up.
- f. Any rear door lock modifications must meet the Federal Motor Vehicle Safety Standards and the lock must be attached to the chassis, not the ramp, unless a secondary lock is attached to the chassis.

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- i. The rear bumper is reinforced.
- ii. The modification meets or exceeds Federal Motor Vehicle Safety Standards crash testing requirements.
- iii. Any rear door lock modifications must meet the Federal Motor Vehicle Safety Standards and the lock must be attached to the chassis, not the ramp, unless a secondary lock is attached to the chassis.
- iv. The modifier must retain an engineer with a bachelor's degree in mechanical engineering with at least 3 years of experience in automotive manufacturing to certify that each vehicle was modified using the design tested to meet or exceed Federal Motor Vehicle Safety Standards.
- v. Separate certification for each vehicle must be presented when the vehicle is submitted for Hack-up as a Wheelchair Accessible Vehicle.

Section 4. Subdivision (c) of section 67-05.2 of Title 35 of the Rules of the City of New York is amended to read as follows:

- (c) The Accessible Taxicab, as manufactured by the original equipment manufacturer ("OEM") or as modified by a[n OEM] National Highway Traffic Safety Administration ("NHTSA")-approved modifier manufacturer (or vehicle modifier), must meet all applicable Americans with Disability Act specifications as required for Wheelchair Accessible Vehicles, as well as the following specifications:

- (1) The minimum ground clearance (measured from frame, loaded to gross vehicle weight rating) must be 5 inches.

- (2)
 - (i) The minimum passenger compartment length (measured from rear of driver's seat base to rear seat base) must be 56 inches.
 - (ii) Exception: For an Accessible Taxicab designed to carry a Passenger using a wheelchair in the front right position beside the Driver, the minimum passenger compartment length must be 38 inches.
- (3) The rear compartment of any vehicle approved for use as an Accessible Taxicab Model must meet the following dimensions as defined by the Society of Automotive Engineers:
 - (i) Effective legroom (L51) must be at least 34.6 inches.
- (4) The front compartment of any vehicle approved for use as an Accessible Taxicab Model must meet the following dimensions:
 - (i) Effective legroom (L34) must be at least 40 inches.
- (5) Total legroom (the sum of L34 and L51) must be at least 74.6 inches.
- (6) [The] Where a Wheelchair Accessible Vehicle is modified using a side entry conversion, the original floor of the Accessible Vehicle, if lowered, must be lowered from the base of the firewall to the area immediately in front of the rear axle.
- (7) If a lowered floor assembly is used[, it] in the process of converting a vehicle to a Wheelchair Accessible Vehicle, the lowered floor must be stainless steel (16 gauge minimum) or the equivalent [and must meet or exceed the 1,000 hour salt spray rating].
- (8) [If a lowered floor assembly is used, a vapor-insulating barrier of ½ inch marine grade plywood] Sound-deadening material must be applied over the lowered metal floor and thoroughly secured.
- (9) The wheelchair ramp must not [block any part of the door or glass] obstruct the drivers' rearview sight while in the stowed position.
- (10) The system provided to securely hold one or more wheelchairs in place must be the system known as Q straint QRT Standard or its equal.

- (11) No anchor points may project more than 1/8 of an inch above the finished floor.
- (12) If the Accessible Taxicab has a middle fold-up passenger seat, it must have a folding mechanism and base plate and must meet the requirements of the Federal Motor Vehicle Safety Standard No. 207, Code of Federal Regulations, title 49, and section 571.207.
- (13) Any modifications to the rear air conditioning must be approved by the OEM.
- (14) Any and all electrical wiring, other than as provided by the OEM, must be PVC-or-better insulated and color-coded for positive identification.
- (15) The back-up alarm must be an electrically operated device that produces an intermittent audible signal when the Accessible Vehicle's transmission is shifted into reverse.
- (16) The converted vehicle must be obtained from the same converter which has manufactured the necessary parts/components and provided the labor to convert the vehicle.
- (17) Conversion of a vehicle with a salvage title certificate, as identified by a relevant State Department of Motor Vehicles, is prohibited.
- (18) All approved Wheelchair Accessible Vehicles, whether modified or not, must meet all applicable federal and state emissions requirements and standards.

Section 5. Subdivision (a) of section 82-50 of Title 35 of the Rules of the City of New York is amended by adding a new paragraph (i), to read as follows:

- (i) An Accessible Street Hail Livery must meet the safety and design specifications set forth in section 59C-04 of these Rules.