

## **New York City Taxi & Limousine Commission**

Proposed Rules – Driver License and Education Amendments

### **Public Hearing Comments**

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# Driver License and Education Amendments

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 [rules.cityofnewyork.us/rule/driver-license-and-education-amendments/](https://rules.cityofnewyork.us/rule/driver-license-and-education-amendments/)



**Rule status:** Proposed

**Agency:** TLC

**Comment by date:** December 17, 2025

[Rule Full Text](#)

TLC-Proposed-Amendment-of-Rules-Relating-to-Driver-License-and-Education-Requirements-Certified.pdf

TLC is proposing several amendments to its rules relating to TLC drivers and driver license applicants, and education requirements.

**Send comments by**

## Public Hearings

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Attendees who need reasonable accommodation for a disability such as a sign language translation should contact the agency by calling [1 \(212\) 676-1135](tel:12126761135) or emailing [\[email protected\]](#) by **December 16, 2025**

[Wednesday Dec 17 - 10:00am EST](#)

Date

December 17, 2025

10:00am - 12:00pm EST

Connect Virtually

<https://www.nyc.gov/site/tlc/index.page>

The public hearing will be held online using Zoom. There will be no in person public hearing. The public hearing will be livestreamed on TLC's website at [www.nyc.gov/tlc](http://www.nyc.gov/tlc). To participate in the public hearing, please e-mail the TLC at [\[email protected\]](#) or call TLC at 212-676-1135 by December 16, 2025. After you have signed up to speak, TLC will provide you with a Zoom URL to enter in on your computer or dial-in via phone number if you prefer to call in.

Disability Accommodation

Communication Access Real-Time Translation

**Comments are now closed.**

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**Online comments:** 4

## C. James Robert von Scholz SC

BY WEBSITE SUBMISSION / NO HARDCOPY SENT:

<https://rules.cityofnewyork.us/rule/driver-license-and-education-amendments/>

New York City Taxi & Limousine Commission

Attn: Office of Legal Affairs

33 Beaver Street, 22nd Floor

New York, NY 10004

Re: Public Comment on Proposed Rule – TLC-157 “Amendments Relating to TLC Drivers, Driver License Applicants, and Education Requirements”

To Whom It May Concern:

I submit this comment regarding the proposed amendments under TLC-157. I do so in my capacity as a long-standing advocate in global administrative matters, but more specifically, as a Registered Representative before the Office of Administrative Trials and Hearings (OATH). I routinely encounter the practical consequences of TLC rulemaking through the drivers, bases, and applicants who appear before OATH and through the riders who depend on this system every day. That perspective informs both my support for the goals of this rule package and my concerns about several operational impacts.

Support: Passenger and Public Benefits

The package as drafted moves the system in the right direction. The expanded accessibility and disability-service training is long overdue. Requiring drivers who have committed service-refusal violations to complete the new Vision Zero and Accessibility remedial course is a practical and fair approach. It aligns with both the NYC Administrative Code and existing NYS DMV standards, and it closes a long-standing gap in ensuring that drivers understand their legal obligations to passengers with disabilities and their equipment.

The rule’s modernization of the Driver License Education Course (including Vision Zero, updated traffic design, defensive driving expectations, device-use restrictions, and customer-service standards) brings TLC requirements up to the level the city’s streets now demand. For the passenger, this means fewer safety lapses, better navigation, and a more consistent professional experience.

I also support the clearer rules around license renewal timing, required completion of the education course, and the elimination of the outdated “lifetime experience” exemption. Safety training evolves; the rules should, too. Requiring every driver (new or returning) to be trained under the same standard makes sense.

The clarification of obligations regarding loading and unloading luggage and mobility equipment is another important improvement. Passengers, particularly older adults and those with disabilities, rely on this assistance. The rule makes the duty clearer and easier for the public to enforce.

Finally, the strengthened “fit to hold a license” standard, when fairly applied, is appropriate. A dynamic, ongoing evaluation of driver fitness helps the Commission screen out individuals who genuinely pose a risk to public welfare.

Taken together, the amendments are firmly grounded in the Commission’s authority under Sections 1043 and 2303 of the Charter and Section 19-503 of the Administrative Code. They promote safety, accessibility, and public confidence in the TLC-licensed transportation system.

#### Opposition: Liabilities, Burdens, and Unintended Consequences for Drivers

There are, however, real impacts on drivers that warrant close review before final adoption. Several of the new requirements increase the likelihood of automatic suspensions. The 60-day deadline for the remedial Vision Zero and Accessibility course (triggered after certain violations) may be too rigid in practice, given that many drivers juggle multiple jobs and unpredictable schedules. The same concern applies to the Portable Electronic Device Course. Suspension for failure to complete the course is understandable, but a short extension mechanism or hardship accommodation would prevent unnecessary loss of income while still preserving the enforcement intent.

The strict limitation on exam attempts (one every 30 days and a maximum of three attempts in a 90-day period) will inevitably result in some otherwise capable applicants being shut out. The intent is good: stronger exam security and higher standards. But without offering additional educational support or addressing language-access disparities, this rule risks excluding applicants who simply need more time or resources; not those who are unqualified.

The requirement that drivers load and unload all passenger property is fair in principle, but in practice, it exposes drivers to possible penalties for refusing unreasonable or unsafe requests. The Commission may wish to clarify what constitutes a “reasonable” request so that drivers are not punished for protecting themselves from injury or for refusing to handle oversized or dangerous items.

Removing the lifetime experience exemption is justifiable, but pairing it with a hard ban on conditional licensure may prolong the time new applicants remain out of the workforce; particularly individuals who previously held TLC licenses in good standing. A narrow, supervised conditional approval system could bridge that gap without undermining the new standards.

Finally, the tightening of misconduct and exam-cheating rules is appropriate, but the new “fit to hold a license” language (if interpreted too broadly) may invite inconsistent enforcement. A clearer statement on proportionality and evidentiary standards would help ensure due process and predictability for drivers.

### Conclusion

This rule package contains important and meaningful improvements (particularly in accessibility, safety training, and service standards) that will benefit passengers and reinforce public trust in TLC-regulated transportation. At the same time, several provisions could produce disproportionate hardship for drivers unless the Commission includes limited flexibility, clearer definitions, or procedural safeguards.

I urge the Commission to move forward with the rules, but to incorporate modest adjustments that will protect both passengers and the hard-working drivers who keep the city’s for-hire transportation sector running.

Thank you for the opportunity to comment.

Respectfully submitted,

/s/ C. James Robert von Scholz  
C. James Robert von Scholz SC  
Dir. Tel. +1.212.444.2670  
Dir. Fax. +1.212.590.6136  
Email : [\[email protected\]](#)

[Comment attachment](#)

TLC-157-12012025.pdf

Comment added December 1, 2025 9:02am

### Dana Shaw

I wholly support this and hope that you will proceed to education courses for bicyclists and license plates for any bike in NYC along with driver’s licenses for bicyclists

Comment added December 10, 2025 4:49pm

## Karen Myers

I believe that the new drivers should all have to take a refresher course, but the longtime drivers should only have to take this refresher course once unless they have complaints, violations, etc. The test for new drivers should be brought back to the older standards if they wish to drive a Yellow Medallion Taxi. The new drivers need to be able to speak English to be able to communicate on a basic level at least. They also need to have knowledge of geography and how to travel the best route to the passenger's destination. I believe also that the original licensing course and any refresher course should teach the drivers about liability insurance and fire theft and collision insurance and what policy covers what. The Yellow Medallion Owners are spending upwards of \$75,000.00 on new WAV Vehicles and are surprised to learn in the event of an accident which is their fault their liability insurance doesn't pay them to fix their vehicle. Education plays a key role in making sure the TLC Drivers out there working keep the public safe and also keep themselves in business.

Comment added December 16, 2025 2:10pm

## Wardak

I have been a licensed TLC driver for the past 10 years. During this time, I have been required to take the mandatory driver education renewal course every three years. Unfortunately, I do not see any meaningful updates or new information in these classes. The content is repeated again and again without adding value for experienced drivers.

Each renewal course costs approximately \$150–\$160 and requires about five hours to complete. For long-term drivers with clean records and many years of experience, this feels like a waste of both time and money. I strongly believe this requirement places an unnecessary burden on professional drivers who already understand TLC rules and regulations.

In my opinion, this policy benefits the education centers financially more than it benefits drivers or public safety. Experienced drivers are being forced to attend the same class repeatedly, even though there is no significant change in material or improvement in driver knowledge.

I respectfully request that the TLC reconsider this requirement for long-term, experienced drivers. Alternatives could include:

- Waiving the course for drivers with clean records
- Replacing it with a short online update only when rules change
- Requiring the course only for new drivers or drivers with violations

I am not fully supporting the current renewal class requirement for experienced drivers and ask the TLC to review and revise this policy to better respect drivers' time, experience, and financial situation.

Thank you for considering this comment.

Comment added December 17, 2025 9:52am





C. James Robert von Scholz SC  
*Advocate / Agent / Federal Lobbyist*  
Direct Tel. +1.212.444.2670  
Direct Fax. +1.212.590.6136  
www.birchhillchambers.com  
jvonscholz@bhchambers.com

Monday, December 1, 2025

**BY WEBSITE SUBMISSION / NO HARDCOPY SENT:**

**<https://rules.cityofnewyork.us/rule/driver-license-and-education-amendments/>**

**New York City Taxi & Limousine Commission**

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**Support: Passenger and Public Benefits**

The package as drafted moves the system in the right direction. The expanded accessibility and disability-service training is long overdue. Requiring drivers who have committed service-refusal violations to complete the new Vision Zero and Accessibility remedial course is a practical and fair approach. It aligns with both the NYC Administrative Code and existing NYS DMV standards, and it closes a long-standing gap in ensuring that drivers understand their legal obligations to passengers with disabilities and their equipment.

B I R C H   H I L L   C H A M B E R S  
115 Forest Avenue, Unit 61, Locust Valley, NY 11560

The rule's modernization of the Driver License Education Course (including Vision Zero, updated traffic design, defensive driving expectations, device-use restrictions, and customer-service standards) brings TLC requirements up to the level the city's streets now demand. For the passenger, this means fewer safety lapses, better navigation, and a more consistent professional experience.

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Taken together, the amendments are firmly grounded in the Commission's authority under Sections 1043 and 2303 of the Charter and Section 19-503 of the Administrative Code. They promote safety, accessibility, and public confidence in the TLC-licensed transportation system.

### **Opposition: Liabilities, Burdens, and Unintended Consequences for Drivers**

There are, however, real impacts on drivers that warrant close review before final adoption.

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The requirement that drivers load and unload all passenger property is fair in principle, but in practice, it exposes drivers to possible penalties for refusing unreasonable or unsafe requests. The Commission may wish to clarify what constitutes a “reasonable” request so that drivers are not punished for protecting themselves from injury or for refusing to handle oversized or dangerous items.

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Finally, the tightening of misconduct and exam-cheating rules is appropriate, but the new “fit to hold a license” language (if interpreted too broadly) may invite inconsistent enforcement. A clearer statement on proportionality and evidentiary standards would help ensure due process and predictability for drivers.

## **Conclusion**

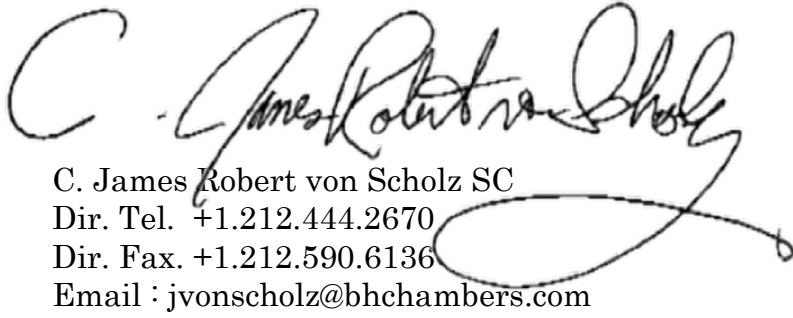
This rule package contains important and meaningful improvements (particularly in accessibility, safety training, and service standards) that will benefit passengers and reinforce public trust in TLC-regulated transportation. At the same time, several provisions could produce disproportionate hardship for drivers unless the Commission includes limited flexibility, clearer definitions, or procedural safeguards.

I urge the Commission to move forward with the rules, but to incorporate modest adjustments that will protect both passengers and the hard-working drivers who keep the city’s for-hire transportation sector running.

Thank you for the opportunity to comment.

B I R C H   H I L L   C H A M B E R S  
115 Forest Avenue, Unit 61, Locust Valley, NY 11560

Respectfully submitted,



C. James Robert von Scholz SC  
Dir. Tel. +1.212.444.2670  
Dir. Fax. +1.212.590.6136  
Email : [jvonscholz@bhchambers.com](mailto:jvonscholz@bhchambers.com)

cc : File

Dear Commissioners,

Classes should school new taxi drivers that they have been ambassadors to New York City. Taxis are part of New York, just like the Empire State Building, Grand Central, or Central Park.

Introductory classes should be unique for medallion drivers. Driving a medallion taxi is different from other kinds of driving. Many topics are unique to medallion taxis, and a separate class that explains the history and purpose of the medallion would give drivers a better perspective and increase pride in their profession.

The class should focus on preventing bad habits that hurt the industry. Things like driving around with the roof light on while there is a passenger in the back seat or having the roof light on and not stopping for a fare. Customers are frustrated by this behavior, and taxis get a bad reputation. These are things that can be corrected through education.

In the class, drivers should be taught basic taxi values, that courtesy and service matter.

In the class, drivers should be taught that helping passengers with luggage is part of professional service. If a driver sees luggage, it is time to help, whether or not the passenger asks.

Cleanliness should be emphasized in the class, especially in taxicabs with partitions, which are harder to keep clean. Customers notice this.

The class should also address discrimination. Drivers need to understand that racism and refusals harm customers and harm the industry.

Classes should emphasize reliability; People use Uber and Lyft because they are reliable. Drivers need to understand the importance of accepting all e-hails and providing reliable service.

The class should also teach proper behavior at hotels, including lining up correctly, avoiding double parking, helping with luggage and understanding that black cars are supposed to park at their base, not in taxi lines.

A class can help medallion drivers understand how the service they provide plays an important role in attracting and keeping customers.

A short, unique class for medallion drivers is an important role for the TLC to help brand the medallion taxi driver for self-respect as well as worldwide respect. This is where it starts.

Thank you.

Michael Simon

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**[EXTERNAL] Comments for Hearing on December 17, 2025**

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**From** Jean Ryan <pansies007@gmail.com>

**Date** Wed 12/17/2025 2:07 AM

**To** tlcrules (TLC) <tlcrules@tlc.nyc.gov>; Davidson, Cindi (TLC) <Davidsonc@tlc.nyc.gov>

**CAUTION! EXTERNAL SENDER.** Never click on links or open attachments if sender is unknown, and never provide user ID or password. If **suspicious**, report this email by hitting the **Phish Alert Button**. If the button is unavailable or you are on a mobile device, forward as an attachment to [phish@oti.nyc.gov](mailto:phish@oti.nyc.gov).

I am unable to testify remotely today because of a conflict. I am going to address the issues without specifying which rule number is applicable. I hope that is acceptable.

I am president of Disabled In Action of Metropolitan NY and our organization has been working for accessible taxis and for hire vehicles since 1996, almost 35 years. At that point, there were zero accessible taxis or for hire vehicles and it was very difficult to get around NYC unless a wheelchair user could drive their own vehicle.

We've come a long way, but there are still problems such as drivers almost always refusing to pick us up when we try to hail a cab in the city or even at the airport taxi line. If we do get a taxi, getting our wheelchair secured and getting a seatbelt, as required by law, are seldom provided in both taxis and for hire vehicles. Sometimes the taxi driver refuses to put our luggage into the vehicle. Recently at the airport, a woman passenger I did not know offered to put my luggage into the cab when the driver refused to let me in the vehicle or put my luggage in.

Hopefully these laws will put teeth into the consequences of our complaints and will encourage people to make complaints when we are refused a ride or securement, as well as when a driver uses electronics, especially TV, YouTube, and FaceTime while driving. Yes, that happens!

We are in favor of the new rules with a few suggested changes.

1. 60 days is too long to let a driver go without taking the retraining course. Drivers, when found guilty or pleading guilty should not be allowed to drive until they take the remedial safety course. Still, this added retraining course is so necessary to improve driver behavior.

2. The hands on part of the course should ideally be done on the driver's own vehicle and with different equipment, especially a motorized wheelchair or a mobility scooter, not just a manual wheelchair. If the driver is required to use their own leased or owned vehicle, they will have the proper securements and seatbelt straps. [The TLC could start changing things for the better by requiring all converters to use the new Q'straint all-in-one seatbelt and securement system on newly converted vehicles. That would eliminate straps from getting lost or confused and would hopefully lead to greater seatbelt compliance.]

3. Cheating on the driver's test or taking it frequently - the planned changes sound like a good idea. Everyone wants an honest, knowledgeable and informative taxi driver.

Thank you for the opportunity to comment.

Jean Ryan

President

Disabled In Action of Metropolitan NY

[pansies007@gmail.com](mailto:pansies007@gmail.com)

917-658-0760

# NEW YORK TAXI WORKERS ALLIANCE

AFL-CIO; Intl. Transport Workers' Federation

31-10 37TH AVE.  
SUITE 300  
LONG ISLAND CITY, NY 11101  
TELEPHONE: (718) 706-9892

Chair David Do  
New York City Taxi & Limousine Commission  
33 Beaver Street  
New York, NY 10004

December 17, 2025

Dear Chair Do,

The New York Taxi Workers Alliance ("NYTWA") submits this comment in opposition to the amendments proposed to 35 RCNY § 56-15(k) and 35 RCNY § 80-04(j)(11).

**The TLC must not require that drivers load and unload passenger property when a passenger's request is unreasonable, and must not subject drivers to the mandatory revocation of their TLC license for a violation of this rule when it is not related to providing services for disabled passengers.**

The TLC has proposed repealing 35 RCNY § 56-15(k)(2), which currently modifies the requirement that drivers assist passengers with loading and unloading luggage and property by providing that drivers must do so only "when necessary or if the passenger requests it" and "within reason."

TLC has provided no rational justification for the amendments; in the Statement of Basis and Purpose, the TLC says only that they seek to amend "the requirement related to loading and unloading passenger property to clarify that the requirement applies to all passenger property." This reasoning is nonsensical--the plain language of the rule makes it clear that it already applies to both the enumerated categories and any "other property." 35 RCNY § 56-15(k)(1), (2).

Even assuming, for the sake of argument, that this reasoning holds, it simply does not justify removing the reasonableness standard—particularly when it means that, under TLC's proposed rule language, all violations will be subject to mandatory penalties that include license revocation. *See* 35 RCNY § 56-02.

There will be circumstances where passengers are seeking to use taxis or for-hire vehicles to transport property, such as furniture or exceptionally heavy loads, that are beyond the scope of mobility aides and luggage currently contemplated by the rules. In these circumstances, it is unreasonable to require drivers to unload the property. Similarly, there will be times when, given the context of, e.g., where drivers are picking up passengers, it may be more reasonable for passengers to load or unload their own luggage. TLC's proposed amendment removes all discretion, and would make all instances of a driver not assisting with loading and unloading passenger property a violation of this rule, no matter how reasonable a driver's lack of participation may be.

In addition, the TLC's proposed amendments collapse the requirement to transport a passenger's mobility aides and other property with the requirement to load and unload luggage or other property; by doing so, the TLC is subjecting drivers to the possibility of facing the most severe consequence possible—mandatory revocation of their TLC license—for all violations of this rule, even if the refusal is not related to providing service to a disabled passenger. To do so is simply irrational; drivers should not have to fear the possible mandatory revocation of their TLC license because they are being asked to perform unreasonable tasks by a passenger. The TLC must not repeal 35 RCNY § 56-15(k)(2) and irrationally require drivers to load and unload all passenger property, regardless of the reasonableness of the request, or face the mandatory revocation of their license.

**The TLC must not repeal the Life Experience Exemption for the TLC Driver License Education Course and exam requirement**

TLC has proposed repealing 35 RCNY § 80-04(j)(11), which currently gives drivers at least ten years of experience an exemption from the requirement to take TLC Driver License Education Course if they fail to apply for a renewal license and their license expires.

TLC's justification for doing so is that there may be new information covered in these courses; however, TLC mandates that drivers regularly take renewal courses. As such, new applicants who previously were licensed by TLC do not need and should not be mandated to take the entire TLC educational course. As the exemption only applies to drivers who have at least ten years of service as a TLC-licensed driver, returning applicants eligible for this exemption have demonstrated they are responsible licensees and capable of serving passengers. These drivers should not be required to take an unnecessary licensing course.

Thank you for your time and consideration of this matter.

Respectfully submitted,

/s/ Allison Langley

Staff Attorney

New York Taxi Workers Alliance