New York City Taxi & Limousine Commission

Proposed Rules – Driver Relief Penalty Reduction and Medallion Relief Program - 8/13/26

Public Hearing Comments:

NYC Taxi & Limousine Commission
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Driver Relief Penalty Reduction and Medallion Relief Program – NYC Rules

rules.cityofnewyork.us/rule/driver-relief-penalty-reduction-and-mrp

Rule status: Proposed

Agency: TLC

Comment by date: August 13, 2026

Printable Version of Proposed Rule Text

Driver-Relief-Penalty-Reduction-and-Medallion-Relief-Program-Certified.pdf

Reduce fines and fees that are negatively affecting TLC licensees and update the Medallion Relief Program rules to facilitate transfer of taxicab medallions participating in the program.

Send comments by

- **Email**:
- **Fax**: 1 (212) 313-3027
- **Mail**: Taxi and Limousine Commission, Office of Legal Affairs, 33 Beaver Street – 22nd Floor ; New York, New York 10004

Public Hearings

Attendees who need reasonable accommodation for a disability such as a sign language translation should contact the agency by calling 1 (212) 676-1135 or emailing by **August 12, 2026**

Thursday Aug 13 - 10:00am EDT

Date

August 13, 2026
10:00am - 12:00pm EDT

Location

Taxi and Limousine Commission
33 Beaver Street – 19th Floor
New York City New York 10004

Disability Accommodation

- Wheelchair Accessible
- Blind or Low Vision Accessible
- Communication Access Real-Time Translation

Comments are now closed.

Online comments: 6

- **C. James Robert von Scholz SC**

  Please find the attached as the Official Submitted Comment. Thank you.

  Comment attachment

  TLC-Driver-Relief-Penalty-Reduction-and-MRP-COMMENT-07202026.pdf

  Comment added July 20, 2026 4:17pm

- **Anonymous**

  Good afternoon Commissioners,

  My name is XYZ, and I am a TLC driver and vehicle owner. I appreciate the opportunity to speak today.

  TLC drivers are small business operators. We carry heavy financial burdens insurance, vehicle financing, repairs, inspections, licensing fees, and daily operating costs. When a violation occurs, the impact goes far beyond the fine. It can mean lost work, suspension, and thousands of dollars in expenses.

  Many TLC penalties start at $400 or more, even for technical or administrative issues. A first-time mistake should not carry the same penalty as a dangerous or intentional violation. I strongly support a more proportionate penalty structure, expanded cure opportunities, and meaningful reductions in fines and fees.

  The $252 driver renewal fee, the $550 vehicle renewal fee, and inspection-related charges should be reviewed and reduced. These recurring costs are overwhelming for working drivers.

  I also want to highlight concerns about undercover enforcement. Drivers can face penalties of $1,000 or more for first-time violations that were initiated by undercover officers. Enforcement is important, but penalties must be fair, transparent, and focused on preventing actual harm.

  Finally, I ask TLC to address the treatment of drivers at inspection sites and main offices. Many drivers experience disrespectful communication, yelling, and hostile interactions. Professional conduct standards and customer-service training would greatly improve the inspection process and strengthen trust between drivers and the agency.

  In closing, I respectfully urge the Commission to adopt deeper reductions in fines and fees, expand cure opportunities, review undercover enforcement practices, and ensure respectful treatment of drivers at all TLC facilities.

  Thank you for your time and consideration.

  Comment attachment

  Driver-Relief-penality-reduction.pdf

  Comment added August 7, 2026 8:47pm

- **yellow driver**

  NYC Taxi and Limousine Commission. Dear TLC Commissioners, I would like to ask for stronger enforcement of TLC rules across the city. Many professional yellow taxi drivers are following the regulations, but some are not, and it’s hurting the reputation of the entire industry.

  Comment added August 7, 2026 10:03pm

- **Fuad**

  NYC Taxi and Limousine Commission
  We need to get rid of that 60-day rule for vehicle use. A lot of us work our butts off seven days a week, and when we finally take a vacation for more than 60 days after a year or two of hard work, you guys ticket us for not using our vehicles (fhv) for over 60 days. That’s just not fair.
  Also,
  I made a major personal investment of over $78,000 to purchase a compliant Wheelchair Accessible Vehicle (WAV) to serve the city. However, platform lock-outs and dispatch restrictions leave WAV drivers trapped with only short, low-paying local trips, while blocking access to long-distance fares and airport queues. Dedicated accessible drivers cannot survive financially under these restricted dispatch conditions.
  We need, A
  Financial relief through reduced TLC fines is welcome, but drivers will still struggle unless the TLC mandate fair, transparent trip distribution across high-volume platforms (Uber/Lyft). fair trip distribution, ends predatory app lock-outs,

  Comment added August 9, 2026 5:23am

- **Ira Goldstein**

  Chair Valdivia and Members of the New York City Taxi and Limousine Commission:

  My name is Ira Goldstein and I am the Executive Director of The Black Car Fund. For those of you who may be unfamiliar, The Black Car Fund (The Fund) was created by New York State statute in 1999 for the purpose of providing workers' compensation coverage to independent contractor black car drivers throughout New York who drive for The Fund's Member Bases. Over the years, The Fund has grown to over 500 Member Bases and we cover well over 100,000 drivers throughout New York. The large majority of the drivers we cover earn their livelihoods in New York City's for-hire vehicle industry and are directly affected by TLC licensing and enforcement policies.

  I submit this testimony in strong support of the driver and vehicle penalty relief provisions in the TLC's proposed rules. I believe the proposed changes are thoughtful and well targeted, as they remove financial penalties while preserving the requirements and suspensions that protect passengers and the public.

  As some of you may know, I spent almost 10 years as Chief of Staff at the TLC, so I understand that enforcement is essential to the agency's mission. Rules involving drug testing, vehicle inspections, and license integrity serve important purposes. At the same time, enforcement is most effective when the consequence is connected to the conduct, proportionate to the violation, and focused on achieving compliance. A penalty should protect the public or correct the problem. It should not impose a second hardship when another enforcement measure has already accomplished that goal.

  Measures such as eliminating the $25 driver license replacement fee and the $50 fines tied to circumstances such as a lost, stolen, or unreadable license, eliminating the $200 fine imposed when a driver completes an annual drug test more than 30 days late, and eliminating the fines for missed vehicle inspections, while retaining suspension until compliance, are practical reforms that preserve accountability without unnecessary financial punishment.

  These changes matter because TLC-licensed drivers and vehicle owners often operate as independent contractors or small businesses. They are responsible for insurance, fuel, maintenance, tolls, vehicle payments or rental costs, licensing expenses, and the everyday costs of supporting their families. A $25, $50, $100, or $200 charge may look modest when viewed in isolation. For a driver who has already been suspended and is unable to work, it can be one more obstacle to regaining financial stability. The larger inspection fines can be even more damaging.

I also believe that licensees are more likely to view enforcement as legitimate when penalties are reserved for conduct that threatens safety, harms passengers, involves fraud, or reflects a serious disregard of regulatory obligations. When suspension already prevents a driver or vehicle from operating until compliance, an additional monetary penalty should have a clear and necessary purpose. In the provisions addressed in the proposed rules, the TLC has reasonably concluded that it does not.

The Fund urges the Commission to adopt these penalty and fee reductions. By removing fines and fees that do not meaningfully add to compliance, the TLC is not retreating from safety or accountability. It is improving the way those goals are enforced. Drivers will remain responsible for meeting drug-testing, inspection, and licensing requirements, but they will not be unnecessarily pushed deeper into financial hardship.

Thank you for the opportunity to provide testimony. I am available at your convenience to answer any questions you may have.

Comment attachment

BCF-Testimony-TLC-Public-Hearing-8.13.2026.pdf

Comment added August 11, 2026 8:20pm

- **David Obeissant**

  As drivers will still struggle with transparent trip distribution across high-volume platforms (Uber/Lyft). fair trip distribution.

  Comment added August 12, 2026 2:05pm

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Monday, July 20, 2026

BY WEBSITE SUBMISSION ONLY: https://rules.cityofnewyork.us/rule/driver-relief-penalty-reduction-and-mrp

NO HARDCOPY SENT

Taxi and Limousine Commission
Office of Legal Affairs
33 Beaver Street, 22nd Floor,
New York, NY 10004

RE: Proposed Rule Change: Driver Relief Penalty Reduction and Medallion Relief Program – PUBLIC COMMENT

Introduction

I submit this comment in response to the Commission's Notice of Public Hearing and Opportunity to Comment on Proposed Rules concerning driver relief penalty reduction and modifications to the Medallion Relief Program. I am a registered representative who has advocated before the Office of Administrative Trials and Hearings (OATH) for many years, representing TLC licensees in administrative enforcement proceedings. I focus on defending drivers, vehicle owners, and base operators in violation proceedings, license suspension and revocation matters, and regulatory compliance counseling under the City's administrative adjudication framework.

This comment addresses: (1) the substantial benefits of the proposed rule changes; (2) potential liabilities and implementation concerns; and (3) specific recommendations to enhance the rule's effectiveness while maintaining public safety and regulatory integrity consistent with New York State and New York City administrative law.

I. BACKGROUND AND RULEMAKING AUTHORITY

The proposed rulemaking arises from Executive Order 11, issued January 14, 2026, which directed City agencies to review fees and penalties affecting small businesses and identify reforms to reduce undue hardships. The Commission proposes to eliminate or reduce multiple driver fees and penalties, eliminate vehicle inspection fines where suspension already ensures compliance, and expand the Medallion Relief Program (MRP/MRP+) to permit intrafamily transfers and partnership modifications.

The Commission's authority for these rules derives from section 2303 of the New York City Charter and section 19-503 of the New York City Administrative Code. Section 2303(a) grants the Commission jurisdiction over "the regulation and supervision of the business and industry of transportation of persons by licensed vehicles for hire," including the authority to establish "standards and criteria for the licensing of vehicles, drivers and chauffeurs, owners and operators." (See NYC Charter 2303.) NYC Charter 2300 Section 19-503 authorizes the Commission to "promulgate such rules and regulations as are necessary to exercise the authority conferred upon it by the charter."

The proposed rules comply with the Citywide Administrative Procedure Act (CAPA) procedural requirements under Charter section 1043, including public notice, opportunity for written and oral comment, and Corporation Counsel and Mayoral Operations review.

II. BENEFITS OF THE PROPOSED RULE CHANGES

The proposed amendments offer substantial benefits to TLC licensees and advance sound regulatory policy by eliminating duplicative penalties, reducing financial barriers to compliance, and providing critical relief to medallion owners. I commend the Commission for these reforms.

(continued on next page)

A. Elimination of Driver License Replacement Fees and Related Fines

1. **License Replacement Fee Elimination (Sections 1, 3, 8)**

The proposed repeal of the $25 driver license replacement fee for paratransit, commuter van, and taxicab drivers removes a financial barrier that prevents drivers from returning to work after license loss or damage. This reform is particularly beneficial for low-income drivers who may delay replacement due to cost, thereby extending their period of unemployment. By eliminating this fee, the Commission removes an economic penalty for circumstances often beyond the driver's control - such as theft, accidental damage, or natural wear—and facilitates immediate return to lawful operation.

2. **Repeal of Fines for License Loss, Damage, and Photo Update (Sections 2, 4, 9)**

The elimination of $50 fines for reporting license loss or theft, possessing unreadable licenses, and failing to maintain updated license photos represents a proportionate recalibration of penalties. Under current rules, these violations impose financial penalties for administrative infractions that do not involve public safety risks or fraudulent conduct. A driver who promptly reports a stolen license and seeks replacement demonstrates responsible conduct; penalizing that driver $50 serves no deterrent function and instead punishes compliance.

The proposed rules appropriately preserve enforcement authority for substantive misconduct (fraud, misrepresentation, or allowing another person to misuse a license) under existing TLC rules. This distinction between administrative non-compliance and deceptive conduct is sound policy. It aligns penalty severity with culpability and harm, a principle reflected in New York administrative law's requirement that sanctions be rationally related to the violation and not arbitrary or excessive.

B. Elimination of Late Drug Testing Fine (Section 10)

The proposed elimination of the $200 fine for drivers who complete their annual drug test more than 30 days past the deadline, while maintaining summary suspension until compliance, appropriately balances public safety with proportionate enforcement.

TLC's annual drug testing requirement serves a critical public safety function, ensuring that drivers remain free from substance abuse throughout their licensure period. The current rule imposes immediate suspension when a driver misses the testing deadline, prohibiting the driver from operating until testing is successfully completed. This suspension directly protects the public by removing potentially impaired drivers from service.

The additional $200 fine imposed after 30 days of non-compliance adds minimal deterrent value beyond the suspension itself. A suspended driver loses all income from TLC-licensed work; this economic consequence provides substantial incentive to complete testing promptly. The $200 fine instead becomes an additional financial burden that may delay the driver's ability to afford the required test, thereby prolonging the suspension and the driver's unemployment. Eliminating this fine while maintaining the suspension until compliance achieves the regulatory goal (ensuring testing completion) without imposing unnecessary economic hardship.

C. Elimination of Vehicle Inspection Fines (Sections 5, 7)

The proposed elimination of fines ranging from $100 to $500 for missed taxicab and for-hire vehicle inspections, while maintaining license suspension until compliance, removes duplicative penalties that serve no additional regulatory purpose.

Under current rules, a vehicle owner whose vehicle inspection becomes overdue faces both monetary fines (escalating with delay duration) and suspension of the vehicle license until the vehicle passes inspection. The suspension alone prevents the unlicensed vehicle from lawful operation, directly achieving the Commission's regulatory objective of ensuring that only inspected, compliant vehicles operate for hire. The monetary fine does not enhance compliance; rather, it penalizes vehicle owners for delays that may result from inspection facility scheduling constraints, mechanical repair timelines, or the owner's financial inability to address identified defects.

By eliminating the fines while requiring appearance and maintaining suspension until compliance, the proposed rule ensures accountability and compliance without imposing cumulative financial penalties on small business owners. This approach is consistent with administrative law principles requiring that penalties be necessary to achieve regulatory objectives and not punitive beyond that purpose.

D. Medallion Relief Program Expansion (Section 6)

The proposed amendments to the Medallion Relief Program (MRP/MRP+) represent critical relief for medallion owners and their families by permitting intrafamily transfers upon death or during life, and allowing partnership entity modifications.

1. **Transfers to Family Members Upon Death or During Life**

The proposed rule permits a medallion owner or the owner's estate to transfer a medallion receiving MRP/MRP+ grant funds to qualifying family members (spouses, domestic partners, biological or adopted children, or children of a surviving spouse or partner) provided the family member is approved by the participating lender and loan payments are current. This reform addresses a critical gap in the current MRP/MRP+ structure, which does not accommodate succession planning or family wealth preservation.

Medallion ownership has historically represented multi-generational family investment and livelihood. The inability to transfer medallions within families under MRP/MRP+ participation created unnecessary forfeitures of family assets and disrupted family-based taxi operations. By permitting transfers to immediate family members who assume MRP/MRP+ obligations, the Commission enables families to preserve wealth, continue operations, and maintain compliance with loan restructuring terms. This reform supports small business continuity and recognizes the family-based structure of much of the medallion industry.

The requirements that the family member provide documentation of relationship, obtain lender approval as an eligible borrower, and bring all loan payments current before transfer provide appropriate safeguards. These conditions ensure that transfers do not undermine the MRP/MRP+ program's financial integrity or shift obligations to unqualified parties.

2. **Removal of Partners from Existing Partnerships**

The proposed rule permits partnerships owning one (1) or more medallions to remove a designated partner upon mutual agreement of all partners and lender approval, provided loan payments are current. This flexibility addresses partnership disputes, retirement, and changes in business relationships that may otherwise prevent efficient medallion operation.

Existing partnership law permits partner withdrawal and removal under governing partnership agreements and statutory default rules. However, the absence of clear TLC authorization for partnership modifications while maintaining MRP/MRP+ participation created uncertainty and potential program forfeiture risks. The proposed rule clarifies that partnership restructuring is permissible within the MRP/MRP+ framework, provided all partners consent, the lender approves, and payments remain current.

This reform supports business flexibility and enables partnerships to resolve internal disputes without sacrificing MRP/MRP+ benefits. It also prevents situations where partnership deadlock or partner incapacity paralyzes medallion operations.

III. POTENTIAL LIABILITIES AND IMPLEMENTATION CONCERNS

While the proposed rules offer substantial benefits, several provisions raise concerns regarding enforcement gaps, unintended consequences, and administrative clarity. Addressing these concerns will strengthen the rules' effectiveness and ensure they achieve their intended purposes without undermining public safety or program integrity.

A. Complete Elimination of Penalties for License-Related Violations May Create Enforcement Gaps

1. **Loss of Deterrent for Negligent License Maintenance**

The proposed repeal of all penalties for license loss, damage, unreadable condition, and failure to update photos removes any financial consequence for negligent license maintenance. While the Commission correctly distinguishes between fraudulent misuse (which remains penalized) and innocent administrative non-compliance, the complete elimination of penalties may reduce driver diligence in protecting and maintaining licenses.

A driver who repeatedly loses licenses, fails to protect licenses from damage, or neglects to update photos demonstrating significant appearance changes imposes administrative costs on the Commission and creates potential public safety risks. Passengers and enforcement officers rely on licenses to verify driver identity and licensure status. An unreadable or severely outdated license photograph undermines this verification function.

Under the proposed rules, a driver who loses a license multiple times within a license term or who allows a license to become illegible through neglect faces no penalty beyond the requirement to obtain a replacement (now at no cost). This may incentivize careless handling and create recurring administrative burdens.

2. **Risk of Abuse Through Repeated Replacement Requests**

Eliminating replacement fees without any limiting mechanism may enable abuse. A driver could intentionally report a license lost, obtain a replacement at no cost, and provide the "lost" license to an unlicensed individual for fraudulent use. While the Commission retains authority to prosecute fraudulent misuse when detected, detection requires complaint or enforcement observation - often occurring only after public harm.

The current $50 reporting fine and $25 replacement fee create modest deterrents against such schemes. Eliminating both without implementing alternative safeguards may increase fraudulent license circulation.

<u>B. Drug Testing Fine Elimination May Extend Non-Compliance Periods</u>

The elimination of the $200 fine for drug tests completed more than 30 days late removes a financial incentive for prompt compliance once suspension occurs.

While suspension itself provides substantial incentive, some suspended drivers may delay testing indefinitely if they have transitioned to other employment or anticipate difficulty passing.

The proposed rule maintains suspension until compliance, which protects the public from untested drivers. However, prolonged suspensions without resolution burden the Commission's license management system and create ambiguity about license status. Drivers who never complete testing remain indefinitely suspended rather than proceeding to revocation, preventing license slot reallocation and creating administrative inefficiency.

Additionally, the $200 fine served a secondary function: it compensated the Commission for the administrative costs of extended non-compliance monitoring and enforcement. Eliminating this recovery without addressing the underlying cost may shift expenses to compliant licensees through increased license fees.

C. Vehicle Inspection Fine Elimination May Not Address Root Causes of Missed Inspections

The elimination of escalating fines for missed inspections removes a financial incentive for timely scheduling and completion. While suspension prevents unlicensed operation, it does not address the underlying reasons for missed inspections: vehicle owners operating marginally profitable vehicles who defer inspections due to anticipated costly repairs, or owners who warehouse vehicles without intent to operate.

Under the current rule structure, escalating fines (up to $500 for delays exceeding 120 days) create increasing pressure to either complete inspection or exit the industry. The proposed rule eliminates fines entirely, maintaining only suspension. An owner content to warehouse a vehicle without operating it faces no consequence beyond suspension of a license they are not using. This may increase the number of suspended-but-not-revoked vehicle licenses, cluttering the license database and preventing reallocation of license capacity.

Furthermore, the current rule permits revocation for delays exceeding 120 days. The proposed rule removes this revocation authority, retaining only "suspension until compliance." This change eliminates the Commission's ability to administratively close chronically non-compliant licenses, forcing reliance on voluntary surrender or separate revocation proceedings.

D. Medallion Relief Program Amendments Require Clearer Eligibility and Process Standards

1. **Ambiguity in "Family Member" Definition**

The proposed rule defines eligible family members as spouses, domestic partners, biological or adopted children, or biological or adopted children of the surviving spouse or partner. This definition may create interpretive disputes in several contexts:

- **Domestic Partnership Proof:** The rule requires "documentation establishing the familial relationship" but does not specify acceptable documentation for domestic partnerships. New York recognizes both registered domestic partnerships and informal cohabitation relationships. Clarification of whether only registered partnerships qualify, and what documentation suffices, is necessary to prevent inconsistent application.
- **Stepchildren and Blended Families:** The definition includes "biological or adopted child of the surviving spouse or partner," but does not address stepchildren of a living medallion owner or children of former spouses. Medallion ownership often spans decades, during which family structures may evolve through remarriage, divorce, and new partnerships. Limiting transfers only to children biologically or adoptively related to the owner or to children of a surviving (deceased owner's) spouse may exclude longstanding family members with legitimate succession interests.
- **Timing of Adoption and Relationship Formation:** The rule does not specify whether the familial relationship must have existed before MRP/MRP+ participation or whether relationships formed after program enrollment

qualify. An adult adoption undertaken solely to facilitate medallion transfer may satisfy the literal rule language while circumventing program intent.

2. **"Mutual Agreement" Standard for Partnership Removal Lacks Procedural Clarity**

The proposed rule permits partner removal upon "mutual agreement by all partners" with "adequate documentation demonstrating such agreement." This standard raises several concerns:

- **Definition of "Mutual Agreement":** As I know it, partnership law recognizes various forms of consent, including express written agreement, implied consent through conduct, and consent by silence or inaction. The rule does not specify whether written agreement is required, whether all partners must affirmatively sign a removal document, or whether acquiescence suffices.
- **Protection Against Coercion:** The rule does not address situations where a partner consents to removal under economic duress, threats, or fraud. Partnership disputes often involve unequal bargaining power, particularly where one partner controls day-to-day operations or financial information. Without procedural safeguards (such as independent counsel requirements, cooling-off periods, or Commission review of circumstances) the "mutual agreement" standard may facilitate coerced removals.
- **Deadlock Resolution:** The rule does not address situations where partners cannot reach agreement on whether to remove a partner. If one or more partners support removal and others oppose it, no mechanism exists to resolve the deadlock. This may leave dysfunctional partnerships unable to restructure while maintaining MRP/MRP+ participation.

3. **Lender Approval Standard Lacks Transparency and Appeal Rights**

Both intrafamily transfers and partnership removals require participating lender approval. The rule does not:

- Specify the criteria lenders must or may apply in evaluating approval requests
- Require lenders to provide written denials with reasons

- Establish timeframes within which lenders must respond to requests
- Provide appeal or review mechanisms for arbitrary or discriminatory lender denials

Lender approval authority, while protecting lenders' financial interests, may be exercised inconsistently or discriminatorily without such standards. A lender might deny approval based on pretext (e.g., preferring to pursue foreclosure) or prohibited factors (e.g., familial status discrimination). Without transparency and accountability mechanisms, lender approval becomes an unchecked veto over family wealth preservation and business restructuring.

4. **"Brought Up to Date" Payment Requirement Lacks Definition**

Both intrafamily transfers and partnership removals require that "all loan payments must be brought up to date prior to the transfer if they are in arrears." This requirement is sound in principle but lacks necessary specificity:

- **Definition of "Arrears":** Does this mean only missed scheduled payments, or does it include accelerated balances due to default, late fees, and accrued interest? Many MRP/MRP+ participants experienced prior defaults resulting in accelerated loan balances. Clarification of whether "brought up to date" requires curing only ongoing payment obligations or satisfying entire accelerated balances is critical.
- **Timeframe for Curing Arrears:** The rule does not specify whether arrears must be cured before initiating the transfer process or only before the Commission records the transfer. This timing ambiguity may create uncertainty about when transfer applications may be submitted and processed.
- **Source of Cure Funds:** The rule does not address whether family members acquiring medallions may cure arrears as part of the transfer transaction or whether cures must come from the transferring owner's funds. Practical family succession planning often involves the successor providing funds to cure arrears; clarifying that this is permissible would facilitate transfers.

IV. RECOMMENDATIONS FOR IMPLEMENTATION WITH MODIFICATIONS

To address the concerns identified above while preserving the benefits of the proposed rules, I respectfully recommend the following modifications and implementation measures.

A. Implement Graduated or Conditional Relief for License-Related Violations

Rather than completely eliminating penalties for license loss, damage, and maintenance failures, consider a graduated approach that distinguishes first occurrences from repeat violations:

Proposed Modified Approach:

1. **First occurrence within a license term:** No fine; no-fee replacement.
2. **Second occurrence within a license term:** $25 fine; no-fee replacement; issuance of warning.
3. **Third or subsequent occurrence within a license term:** $50 fine; mandatory completion of license responsibility training; potential administrative review for negligent license maintenance.

This structure preserves relief for drivers experiencing isolated incidents while maintaining accountability for chronic carelessness. It also creates an enforcement escalation pathway that enables the Commission to identify and address patterns of negligent conduct without imposing immediate financial burdens on drivers facing first-time license issues.

Alternative Approach - Conditional No-Fee Replacement:

Maintain no-fee replacement for all drivers but implement a tracking system that flags repeated replacements (three (3) or more within a license term) for administrative review. Upon review, the Commission may:

- Issue a warning and require license care training
- Impose conditions on the next replacement (fee requirement, expedited processing suspension)

- Initiate fitness review if repeated losses suggest inability to maintain required documentation

This alternative preserves cost-free replacement for the vast majority of drivers while enabling targeted intervention for patterns suggesting negligence or potential fraud.

B. Retain Modest Late Drug Testing Penalty with Hardship Waiver

Rather than completely eliminating the $200 late drug testing fine, consider reducing it and implementing a hardship waiver process:

Proposed Modified Approach:

1. Maintain summary suspension upon missed testing deadline (no change).
2. Impose $50 fine (reduced from $200) if compliance occurs more than 30 days after deadline.
3. Provide hardship waiver: A driver may request fine waiver by demonstrating that delay resulted from:
   - Medical incapacity documented by healthcare provider
   - Testing facility unavailability despite timely appointment requests
   - Financial hardship (income below 200% federal poverty level)
   - Other compelling circumstances beyond driver's control

This structure maintains financial incentive for prompt compliance while providing relief for drivers facing genuine hardship. The reduced fine ($50 rather than $200) lessens burden while preserving cost recovery and deterrent function.

Additional Recommendation - Progressive Compliance Incentive:

Alternatively, implement a progressive reduction structure:

- Compliance within 15 days of deadline: No fine
- Compliance 16-30 days after deadline: $25 fine
- Compliance 31-60 days after deadline: $50 fine
- Compliance more than 60 days after deadline: $100 fine plus potential license review

This creates clear incentives for prompt compliance while scaling penalties to delay duration.

C. Implement Revocation Authority for Chronic Vehicle Inspection Non-Compliance

The proposed elimination of inspection fines should be coupled with clear revocation authority for chronic non-compliance:

Proposed Addition to Section 5:

"Suspension until compliance. Appearance REQUIRED. Vehicle licenses suspended for more than 180 consecutive days for failure to complete required inspection may be revoked following notice and opportunity for hearing. The Commission may, in its discretion, grant additional time for compliance upon showing of good cause, including documented efforts to complete inspection, pending mechanical repairs, or financial hardship requiring extended time to finance repairs."

This amendment enables the Commission to administratively close chronically non-compliant licenses while preserving flexibility for owners actively working toward compliance. The 180-day threshold (extending the current 120-day maximum fine threshold) provides substantial time for resolution while preventing indefinite warehousing of suspended licenses.

Additional Recommendation - Inspection Scheduling Assistance:

To address root causes of missed inspections, implement a proactive scheduling reminder system:

- 30-day advance notice of upcoming inspection deadline via email and text
- 14-day advance notice with scheduling assistance resources
- 7-day notice with warning of impending suspension
- Day-of-deadline notice with suspension warning and compliance resources

This system, paired with elimination of fines and clear revocation authority for chronic non-compliance, balances support with accountability.

D. Clarify and Strengthen Medallion Relief Program Amendment Standards

1. **Family Member Definition Clarifications**

Recommend amending Section 6(f)(1)(i) as follows:

"(i) The family member must be, or must have been at the time of the medallion owner's death:

1. A spouse legally married to the medallion owner, or a domestic partner registered with the City Clerk's Office or equivalent jurisdiction, provided the partnership was registered at least one year prior to transfer application or prior to the medallion owner's death;

2. A biological or adoptive child of the medallion owner, provided any adoption was finalized at least one year prior to transfer application or prior to the medallion owner's death, except that this timing requirement shall not apply to adoptions of minors;

3. A biological or adoptive child of the medallion owner's spouse or registered domestic partner, provided the relationship was established at least one year prior to transfer application or prior to the medallion owner's death, except that this timing requirement shall not apply to adoptions of minors; or

4. A stepchild of the medallion owner who has resided with the medallion owner for at least three consecutive years prior to transfer application or prior to the medallion owner's death and who can demonstrate substantial familial relationship through joint financial arrangements, dependency, or other indicia of family relationship as determined by the Commission."

These clarifications:

- Require registered domestic partnerships (preventing post-hoc informal relationship claims)
- Implement timing requirements to prevent transfers of convenience while preserving legitimate family successions
- Expand eligibility to include longstanding stepchildren with demonstrated family relationships
- Preserve flexibility for genuine family structures while preventing abuse

2. **Partnership Removal Process Standards**

Recommend amending Section 6(f)(2) to add:

"(I)(A) All partners must execute a written agreement explicitly consenting to the removal of the designated partner. The agreement must:

1. Identify all partners by name and ownership percentage;
2. Identify the partner to be removed;
3. State the reasons for removal;
4. Confirm that all partners have had opportunity to consult independent legal counsel;
5. Confirm that consent is voluntary and not the product of duress, coercion, or fraud;
6. Specify the financial terms of removal, including any buyout, assumption of liabilities, or release of claims; and
7. Be notarized.

2. If any partner is alleged to lack capacity, be subject to coercion, or contest the removal, the Commission shall conduct a hearing pursuant to OATH procedures before approving the removal.
3. Partners unable to reach mutual agreement on removal may petition the Commission for medallion license partition or alternative resolution consistent with partnership law and MRP/MRP+ program integrity."

These procedural requirements:

- Ensure documented, informed consent by all partners
- Create evidentiary record protecting against subsequent challenges
- Provide due process for contested removals
- Enable resolution of partnership deadlocks through Commission intervention

3. **Lender Approval Standards and Transparency**

Recommend adding new subdivision (3) to Section 6(f):

"(3) Participating Lender Approval Requirements

1. Within 30 days of receipt of a complete transfer or partnership modification application, the participating lender must provide written approval or denial.

2. Any denial must state the specific reasons for denial and identify the criteria or standards upon which denial is based.
3. A medallion owner or partnership may appeal a lender denial to the Commission within 15 days of receipt. The Commission shall review the denial de novo and may approve the transfer or modification if:
    1. The proposed transferee or modified partnership satisfies all Commission eligibility requirements;
    2. All loan payments have been brought current or a payment cure plan acceptable to the Commission has been established;
    3. The transfer or modification will not materially impair the lender's security interest or reasonable expectation of loan repayment; and
    4. The lender's denial was arbitrary, capricious, or based on impermissible criteria.
4. The Commission's determination under this subdivision is subject to judicial review pursuant to Article 78 of the New York Civil Practice Law and Rules."

These standards:

- Establish clear timelines preventing indefinite lender delay
- Require reasoned denials enabling meaningful review
- Provide accessible appeal mechanism balancing lender interests with family succession rights
- Create judicial review pathway consistent with administrative law due process requirements

4. **"Brought Up to Date" Payment Standard**

Recommend amending Sections 6(f)(1)(iv) and (f)(2)(iii) to clarify:

"All loan payments on behalf of the medallion owner [or partnership] must be brought up to date prior to recordation of the transfer [or removal] if they are in arrears. For purposes of this subdivision:

1. 'Brought up to date' means that all scheduled loan payments due as of the date of transfer recordation have been paid, including any past-due payments, late

fees, and accrued interest on past-due amounts. If the loan has been accelerated due to default, the medallion owner or transferee must either (1) cure the default and de-accelerate the loan pursuant to the loan agreement, or (2) establish a Commission-approved payment plan satisfactory to the participating lender.

2. Payment may be made by the medallion owner, the transferee, or any third party on behalf of either.

3. The medallion owner or partnership may initiate the transfer or removal application process before payments are current, provided all arrears are cured before the Commission records the transfer or removal."

This clarification:

- Defines "brought up to date" with specificity, addressing accelerated loans
- Confirms transferees may cure arrears, facilitating family succession
- Enables application processing before full cure, reducing timeline while maintaining payment requirement

E. Implementation Timeline and Transition Provisions

Recommended Phased Implementation:

1. **Immediate (upon rule effectiveness):**
   - Eliminate driver license replacement fees
   - Eliminate vehicle inspection fines (retaining suspension)
   - Implement drug testing fine reduction (if adopted) or elimination
2. **Within 60 days of rule effectiveness:**
   - Implement graduated penalty system for repeat license loss (if adopted)
   - Establish hardship waiver process for drug testing fines (if adopted)
   - Develop and publish intrafamily transfer and partnership removal application forms and guidance
   - Train TLC staff on new MRP/MRP+ transfer and removal procedures
3. **Within 90 days of rule effectiveness:**
   - Launch inspection scheduling reminder system

- Publish lender approval standards and appeal procedures
- Establish OATH hearing procedures for contested partnership removals

Transition Provisions for Pending Matters:

- Drivers with pending violations for license loss, damage, or photo update at the time of rule effectiveness should have fines dismissed or reduced consistent with new standards
- Drug testing fines imposed within 90 days before rule effectiveness should be reduced or refunded consistent with new penalty structure
- Vehicle owners with pending inspection violations should have fines dismissed, retaining suspension until compliance
- MRP/MRP+ participants who were denied transfers or partnership modifications under prior rules should be permitted to reapply under new standards within 180 days

<u>F. Data Collection and Program Evaluation</u>

To assess the effectiveness of these reforms and identify any unintended consequences, the Commission should implement data collection and reporting requirements:

Recommended Data Points:

1. **Driver License Replacements:**
    - Number of replacement requests per quarter
    - Number of drivers requesting multiple replacements within a license term
    - Reasons for replacement (loss, theft, damage, illegibility)
    - Any identified fraudulent use of replaced licenses
2. **Drug Testing Compliance:**
    - Percentage of drivers completing testing on time
    - Average delay for late completions
    - Number of drivers remaining suspended more than 60 days post-deadline
    - Correlation between fine elimination and compliance rates

3. **Vehicle Inspection Compliance:**
   - Number of vehicles suspended for missed inspections
   - Average suspension duration
   - Number of vehicle licenses suspended more than 180 days
   - Comparison of compliance rates before and after fine elimination
4. **MRP/MRP+ Transfers and Modifications:**
   - Number of intrafamily transfer applications and approvals
   - Number of partnership removal applications and approvals
   - Lender approval and denial rates
   - Number of appeals filed and outcomes
   - Demographic data on transferees (to assess program accessibility)

Recommended Reporting:

The Commission should publish a public report 18 months after rule effectiveness evaluating the impact of these reforms, including the data above and recommendations for any necessary adjustments. This report should be submitted to the City Council and Mayor's Office, consistent with the Commission's accountability obligations under the Charter.

V. CONCLUSION

The proposed rules represent meaningful reform that will reduce financial burdens on TLC licensees, facilitate compliance, and support medallion owner family wealth preservation. The elimination of duplicative fines and fees advances sound regulatory policy by focusing enforcement resources on substantive violations while removing unnecessary barriers for small business operators.

The recommendations offered in this comment are intended to strengthen these reforms by addressing potential enforcement gaps, providing clearer standards for MRP/MRP+ transfers and partnership modifications, and ensuring that relief measures do not inadvertently reduce public safety or program integrity. Graduated penalties for repeat violations, modest late compliance fees with hardship waivers, clear revocation authority for chronic non-compliance, and detailed MRP/MRP+

procedural standards will enhance the rules' effectiveness while preserving their core benefits.

I respectfully urge the Commission to adopt these rules with the recommended modifications. I am available to discuss these comments further and to provide additional input during the implementation process.

Thank you for your consideration of these comments and for your continued efforts to support TLC licensees while maintaining the safety and quality of for-hire transportation services in New York City.

Respectfully submitted,

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Dir. Tel. +1.212.444.2670
Dir. Fax. +1.212.590.6136
Email: jvonscholz@bhchambers.com

cc : File

Testimony of Ira J. Goldstein
Executive Director, The Black Car Fund

Before the New York City Taxi and Limousine Commission
Public Hearing on Driver Relief Penalty Reduction

August 13, 2026

Chair Valdivia and Members of the New York City Taxi and Limousine Commission:

My name is Ira Goldstein and I am the Executive Director of The Black Car Fund. For those of you who may be unfamiliar, The Black Car Fund (The Fund) was created by New York State statute in 1999 for the purpose of providing workers' compensation coverage to independent contractor black car drivers throughout New York who drive for The Fund's Member Bases. Over the years, The Fund has grown to over 500 Member Bases and we cover well over 100,000 drivers throughout New York. The large majority of the drivers we cover earn their livelihoods in New York City's for-hire vehicle industry and are directly affected by TLC licensing and enforcement policies.

I submit this testimony in strong support of the driver and vehicle penalty relief provisions in the TLC's proposed rules. I believe the proposed changes are thoughtful and well targeted, as they remove financial penalties while preserving the requirements and suspensions that protect passengers and the public.

As some of you may know, I spent almost 10 years as Chief of Staff at the TLC, so I understand that enforcement is essential to the agency's mission. Rules involving drug testing, vehicle inspections, and license integrity serve important purposes. At the same time, enforcement is most effective when the consequence is connected to the conduct, proportionate to the violation, and focused on achieving compliance. A penalty should protect the public or correct the problem. It should not impose a second hardship when another enforcement measure has already accomplished that goal.

Measures such as eliminating the $25 driver license replacement fee and the $50 fines tied to circumstances such as a lost, stolen, or unreadable license, eliminating the $200 fine imposed when a driver completes an annual drug test more than 30 days late, and eliminating the fines for missed vehicle inspections, while retaining suspension until compliance, are practical reforms that preserve accountability without unnecessary financial punishment.

These changes matter because TLC-licensed drivers and vehicle owners often operate as independent contractors or small businesses. They are responsible for insurance, fuel, maintenance, tolls, vehicle payments or rental costs, licensing expenses, and the everyday costs of supporting their families. A $25, $50, $100, or $200 charge may look modest when viewed in isolation. For a driver who has already been suspended and is unable to work, it can be one more obstacle to regaining financial stability. The larger inspection fines can be even more damaging.

I also believe that licensees are more likely to view enforcement as legitimate when penalties are reserved for conduct that threatens safety, harms passengers, involves fraud, or reflects a serious disregard of regulatory obligations. When suspension already prevents a driver or vehicle from operating until compliance, an additional monetary penalty should have a clear and necessary purpose. In the provisions addressed in the proposed rules, the TLC has reasonably concluded that it does not.

The Fund urges the Commission to adopt these penalty and fee reductions. By removing fines and fees that do not meaningfully add to compliance, the TLC is not retreating from safety or accountability. It is improving the way those goals are enforced. Drivers will remain responsible for meeting drug-testing, inspection, and licensing requirements, but they will not be unnecessarily pushed deeper into financial hardship.

Thank you for the opportunity to provide testimony. I am available at your convenience to answer any questions you may have.

Written Testimony: Andrew Greenblatt, Policy Director
Independent Drivers Guild (IDG)
Before the NYC Taxi & Limousine Commission
Hearing on Proposed Rules Reducing Fees

August 13, 2026

My name is Andrew Greenblatt, and I am the Policy Director of the Independent Drivers Guild. We represent over 140,000 for-hire vehicle drivers across New York.

In my oral testimony on August 13, I reference a letter the IDG sent in May concerning the need for a pay increase, and a memo we sent concerning the reduction of fees and fines. I am attaching those here so that they may be included in the record for this hearing.

If you have any questions or would like to discuss this further, please contact me at andrew@idgbenefits.org or 646-847-9606.

May 6, 2026

Commissioner Midori Valdivia
New York City Taxi and Limousine Commission
33 Beaver Street
New York, NY 10004

Via: Email

RE: Urgent Request for Rulemaking to Adjust Driver Pay for Rising No-Fault Insurance Costs and Gas Prices

Dear Commissioner Valdivia,

My name is Andrew Greenblatt, and I am the Policy Director of the Independent Drivers Guild (IDG), an affiliate of the IAM Union (formerly the Machinists). The IDG represents over 140,000 for-hire vehicle drivers in New York, including approximately 80,000 in New York City. I am writing to you today regarding a looming financial crisis for our city's drivers that requires the Commission's immediate intervention.

As you may know, the Independent Drivers Guild is the organization that proposed and petitioned for the TLC and New York City to establish the nation's first livable minimum wage for New York's rideshare drivers. Our members spent more than two years organizing and advocating to secure this crucial protection in coordination with the TLC and City lawmakers

While we appreciate the TLC's annual commitment to adjust the minimum per-mile and per-minute pay rates based on the CPI-W, as outlined in Industry Notice #26-03, that adjustment alone is insufficient to protect driver earnings. Drivers are facing historic increases in both insurance rates and gasoline prices that are not addressed in the latest pay increases.

As you are aware, the New York State Department of Financial Services (DFS) has identified a critical shortfall in the no-fault insurance market for livery and FHV drivers. To stabilize this market, the state is implementing a massive insurance rate increase of approximately 25% over the next three years.

The first phase of this increase—a jump of more than 9%—took effect on March 1 of this year.

The IDG worked with the state DFS to ensure that these insurance adjustments were structured to give the TLC a clear window to act. We fought for a coordinated system specifically so the Commission could take these skyrocketing operating expenses into account and initiate the required separate rulemaking process needed to raise pay beyond the CPI-W in a timely manner. The State has done its part by providing the data and the timeline. Unfortunately, the TLC has yet to initiate the rulemaking process necessary to ensure that drivers are not the ones forced to bear these costs.

New York's Uber and Lyft drivers are already struggling. When done properly, the TLC sets minimum rates at a level that only gets the average driver to the state's minimum wage. Allowing a 9% spike in insurance costs to hit drivers without a corresponding increase in the expense-reimbursement portion of the pay formula means the TLC minimum pay rate is now BELOW the minimum wage in violation of the TLC's mandate.

Since I first brought this to the attention of the TLC in a letter to Acting Commissioner Hines dated March 6, 2026, things have only gotten worse due to the sharp spike in gasoline prices caused by the ongoing war with Iran. As you are aware, fuel is one of the single largest operating expenses for rideshare drivers. Unlike traditional employees, drivers bear the full brunt of these volatile market fluctuations. The current pay rate does not adequately account for these increases in overhead, effectively resulting in a pay cut for every mile we drive.

The TLC's current pay standard is intended to ensure drivers earn at least the minimum wage after expenses. When two of the largest expenses a driver faces—insurance and gasoline—are hiked by government mandate or international market forces, the pay floor must rise. If the TLC fails to act, they are effectively sanctioning a pay cut for 140,000 hardworking New Yorkers.

We cannot allow billion-dollar app companies to once again exploit our people by offloading the cost of a state-mandated insurance fix or high gasoline prices onto individual drivers.

We call on the TLC to immediately begin the rulemaking process required to raise minimum pay rates to compensate for these higher insurance premiums and gas prices. Drivers have waited long enough for stability; they should not have to pay out of pocket for the Commission's delay.

I look forward to answering any questions you may have and receiving a response to our request

Sincerely,

Andrew Greenblatt, Policy Director
Independent Drivers Guild

Memorandum

To: TLC Commissioner Midori Valdivia
From: The Independent Drivers Guild
Date: April 20, 2026

Re: Reducing Fees and Addressing Burdensome Regulations

Introduction:

Before your confirmation as the new Commissioner of the Taxi & Limousine Commission, you requested that we compile a list of fees imposed by the TLC that you could see if the commission could reduce, and to identify regulations that are particularly burdensome for drivers. We canvassed a number of members and have compiled the following.

This memo is divided into two parts: Fees and Regulations. The first is a list of fees drivers must pay in order to get and keep a TLC driver's license. There is no particular fee that, in and of itself, is outrageous. Rather, it is death by a thousand cuts for drivers who are looking to begin working, or continue working. Every dollar spent on fees and required services is a dollar they can’t spend on their families. Our request here is that you lower the fees wherever it is within your power. Driving is a profession that attracts immigrants who often reach our shores with little

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Section I - Fees

Below is a list of fees drivers must pay in order to get and keep a TLC driver's license. There is no particular fee that, in and of itself, is outrageous. Rather, it is the total amount needed to begin working or continue working. Every dollar spent on fees and required services is a dollar they can’t spend on their families. Our request here is that you lower the fees wherever it is within your power. Driving is a profession that attracts immigrants who often reach our shores with little or no money. The barriers the TLC has erected for these workers add up to $800-$950 before they pick up their first passenger. For many people, that means they can not start working.

1. Initial Application Costs (To Get Your License)

The first phase involves several one-time requirements and the initial 3-year license fee.

Item	Estimated Cost	Paid To
TLC Application Fee	**$252**	TLC (via LARS)
Fingerprints & Photo	**$90.25**	IdentoGO
Drug Test	**$34**	LabCorp
24-Hour Driver Course	**$175 – $250**	TLC-Authorized School
TLC Driver Exam	**$49** (per attempt)	PSI Services
WAV Training (Wheelchair Access)	**$50 – $125**	TLC-Authorized School
Defensive Driving Course	**$25 – $75**[1]	DMV-Certified Provider
Medical Exam	**$75 – $150**	Licensed Physician
License Upgrade (Class E)	**$21 – $30**	NYS DMV

Note: The **$252 application fee** is non-refundable. If an application is denied or a

[1] The IDG offers this course for free to a limited number of drivers with support from The Black Car Fund.

driver fails to complete the requirements within 90 days, they will not get this money back. Often, a lack of funds prevents a driver from completing their steps on time. This then becomes another case where it is more expensive to be poor.

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2. Recurring Costs (To Retain Your License)

Once a driver has a license, there are ongoing requirements to keep it active.

- **Annual Drug Test ($34):** A driver must take a drug test every year on the anniversary of their license date.

- **TLC License Renewal ($252):** Every three years, a driver must pay the processing fee to renew their license for another term.

- **Renewal Course ($100 – $150):** Every three years, a driver must complete a continuing education course before renewing.

- **Defensive Driving Course ($25 – $75):** This must be retaken every three years to remain valid for their TLC renewal.

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3. Potential "Hidden" or Penalty Fees

- **Late Renewal Fee ($25):** If a driver pays their renewal fee less than 30 days before their license expires, a late fee is added.

- **Interim Drug Test Fine ($200):** If a driver miss your annual drug test and takes it more than 30 days late, the TLC imposes a significant fine and may suspend their license.

- **Summonses and Fines:** Any outstanding parking, traffic, or TLC-specific tickets must be paid in full before a driver can renew their license.

- **Credit Card Surcharge:** Paying TLC fees online via credit or debit card usually incurs a **2.49% convenience fee**.

Summary of Total Estimated Costs

- **First Year (Initial):** ~$800 to $950
- **Years 2 & 3 (Maintenance):** $34 per year (drug test)

- **Year 4 (Renewal):** ~$450 to $500 (includes license fee, drug test, and courses)

Section II - Burdensome Regulations

While the financial costs of getting and keeping a TLC license are significant, the regulatory environment presents its own set of hurdles. Many existing rules create unnecessary downtime for drivers, allow for exploitation by fleet owners, or lack the flexibility required for a modern workforce. Below are the key regulatory burdens we believe should be addressed immediately.

1. Insurance and Fleet Transfer "Stalling"

Currently, when a driver leases a vehicle, they are added to the owner's insurance policy (such as American Transit). If a driver wishes to move to a different fleet owner or own their own vehicle, the original owner must remove the driver from their policy before the new owner can add them.

We have found that fleet companies frequently stall this process for several reasons:

- **Coercion:** Using the insurance removal as leverage to force a driver to stay.
- **Operational Delay:** Waiting until they have a replacement driver lined up before releasing the current one.
- **Administrative Inertia:** A simple lack of urgency that leaves the driver in professional limbo.
- **The Impact:** Until that removal is processed, a driver is effectively barred from working, even if they have a new vehicle and contract ready to go.

2. Licensing Transparency and Non-Refundable Fees

The TLC currently does not provide a pre-screening process for criminal background checks. A driver may pay the non-refundable $252 application fee and meet several other costly requirements, only to be denied after a background check that the TLC could have flagged at the start. We recommend a "pre-check" system or, at the very least, a partial refund policy for those denied early in the process.

3. Automatic Suspension Upon Arrest

The current policy of suspending a driver's license immediately upon an arrest—regardless of the nature of the charge—is a violation of the principle of "innocent until proven guilty."

- Cases can take months to reach a dismissal or an acquittal.
- Drivers are often victims of false accusations or personal disputes.
- **The Impact:** A driver loses their entire livelihood for months based on an unproven accusation, creating a devastating financial spiral even when they are ultimately found innocent.

4. Redundant WAV Certification Requirements

For Wheelchair Accessible Vehicles (WAV), the TLC requires a physical stamped letter from the modification company to prove the vehicle's status. This is particularly burdensome during simple transfers, such as moving a vehicle title from an LLC to an individual to secure lower insurance rates.

- **The Solution:** Once a vehicle has been modified and certified, that status should be permanently attached to the **VIN number** in the TLC database. Requiring repetitive physical paperwork for a vehicle the TLC already knows is accessible is an unnecessary bureaucratic hurdle.

5. Disparity in Vehicle Standards (Rideshare vs. Yellow Taxi)

There is an odd inconsistency in which WAV conversions are accepted. For example, a 2017-2020 Chrysler Pacifica Hybrid Accessible conversion is permitted for use as a Yellow Taxi but is often rejected for rideshare use. A vehicle that is safe and accessible for a street hail should be equally acceptable for a pre-arranged app trip.

6. E-ZPass Issues and Plate Forfeiture

If a driver attempts to renew their plates while owing money to E-ZPass, the TLC currently seizes the plates. Even after the driver settles their debt with E-ZPass, they are often unable to recover the original plates and must jump through additional hoops to get back on the road. This punitive measure exceeds the goal of debt collection and serves only to stop a driver from earning the very money they need to pay those debts.

7. Base Affiliation Constraints

Currently, Lyft does not allow drivers to affiliate their vehicles with it as a "base." This limits the flexibility of the driver and creates unnecessary administrative friction in how they choose to operate their business. Lyft should be required to accept drivers as affiliates.

Conclusion

The cumulative weight of these fees and regulations creates a system where it is increasingly difficult for hardworking New Yorkers to survive. By lowering these financial barriers and streamlining these "bottleneck" regulations, the Commission can add to the dignity and success of the driver. We look forward to discussing these items with you in further detail.

MTBOT
Metropolitan Taxicab Board of Trade

39-24 24th Street, 2nd Floor
Long Island City, NY 11101
Phone: (718) 784-4511
Fax: (718) 784-1329
E-mail: pmazer@metrotaxiboardoftrade.com

Peter M. Mazer
General Counsel

August 13, 2026

New York City Taxi and Limousine Commission
Office of Legal Affairs
33 Beaver Street, 22nd Floor
New York, NY 10004

By E-Mail: tlcrules@tlc.nyc.gov

Re: **Comments with Respect to Proposed Rule Amendments: August 13, 2026 Public Hearing**

Dear Chairperson Valdivia and Members of the Commission:

The following comments with respect to proposed rules under consideration by the Taxi and Limousine Commission are submitted on behalf of the Metropolitan Taxicab Board of Trade (MTBOT). Since 1952 MTBOT has been a leading advocate for the medallion taxicab industry, representing the interests of medallion owners and operators. We also promote the interests of licensed taxicab drivers and have provided free representation before administrative tribunals and in court to drivers who lease taxicabs from MTBOT members. We have represented drivers at nearly 20,000 hearings and have provided free legal services valued at more than two million dollars to these drivers.

The rules under consideration by the Commission are a first attempt to comply with the Mayor's Executive Order No. 11. This Executive Order directs agencies to review fees and penalties imposed on small businesses and to provide the Deputy Mayor for Economic Justice an inventory of such fees and penalties, identifying whether such fees can be reduced by rulemaking, city action or state action. The Order also directs agencies to improve the delivery of services to these businesses. While the Executive Order focuses on fees and penalties, the Mayor also stated in the Order that "the City must ensure that it is not contributing to the affordability crisis through . . . regulations that are outdated, unnecessary or otherwise creating undue hardship for honest small businesses." The rules under consideration by the Commission each fulfill a requirement set forth in the Executive Order, and MTBOT supports these proposed changes. But the Commission can, and must, do more to address the affordability crisis our licensees face every day.

First, it is necessary to decide exactly who among the over one hundred thousand TLC licensees is a small business. In the Statement of Basis and Purpose, TLC correctly notes that drivers, vehicle owners, and "some base owners" are small business. But this is not an exclusive list. A study by the United States Small Business Administration in the early 1970's analyzed the ownership of taxicab medallions and identified such owners and fleets as "small businesses." By definition, small business are so designated by their market share, revenue and assets, and the business's ability to establish prices and control supply and demand. Using this definition, virtually all of the business entities licensed by the TLC, including entities such as taxicab agents, taxicab brokers, and taximeter businesses, would qualify as small businesses.

Most medallion owners, including owners of multiple medallions and defined as fleets, would also fit within the definition of a small business. Not every TLC-licensed business is a small business. For example, a Transportation Network Company (TNC) controls a large portion of the for-hire market share and would not qualify as a small business. But individual vehicle owners, or owners of groups of vehicles, would qualify. Since the Mayor's Executive Order does not define "small business", it seems clear that the definitions contained in the federal regulations would appropriately be applied to determine which businesses are entitled to fee and penalty relief and regulatory reform. Therefore, we urge the TLC to also review rules, penalties and procedures as they affect licensees such as all medallion owners, taxicab agents, taxicab brokers, and taximeter shops to ensure compliance with Executive Order No. 11.

MTBOT supports each of the specific rule proposals before the Commission; however, we have a few comments and suggestions:

- Eliminating the fee for replacing a lost, stolen or mutilated license is fair and consistent with the Mayor's Executive Oder. The Statement of Basis and Purpose states that appropriate safeguards will remain in place to prevent fraud or misuse of a lost or stolen license. We urge the Commission to strictly enforce and prosecute violators of rules prohibiting misuse of licenses.
- We agree with the Commission in eliminating the penalty for missing a mandatory drug test, especially since these licensees already face suspension of the license until the drug test is completed.
- We support the elimination of the fine imposed for a missed vehicle inspection. However, since the penalty of "suspension until compliance" remains in effect, it is essential that procedures remain in place for a vehicle owner to receive a hearing to challenge the alleged violation ***before*** any suspension is imposed. There have been occasions where summonses are written in error, and a hearing should be required to adjudicate these violations before any suspension is imposed on a vehicle owner of licensee.

Medallion Relief Program Amendments

The Medallion Relief Program (MRP) provides financial relief to some, but by no means all small businesses who face financial hardship. In light of the Mayor's Executive Order requesting that agencies review regulations that create undue hardship for small businesses, the Commission should review the Program, especially with respect to limitations with respect to ownership participation.

The proposed amendment to these rules corrects a situation whereby certain owners have been deemed ineligible to participate in MRP, based upon ownership structure and estate issues. For example, children of a deceased medallion owner who wished to operate a medallion had been deemed ineligible to participate in

MRP where the medallion was inherited instead by a surviving spouse. This created unnecessary hardships for some families and adversely affected their ability to operate their family medallions.

However, the proposed rules do not address another concern facing the medallion industry, an industry of first and second-generation immigrants and small family businesses. Virtually all medallion owners are small businesses. Limiting participation in MRP to only owners of six or fewer medallions is arbitrary and inconsistent with the Mayor's Executive Order. It denies participation by many small business owners, including owners with substantial debt. For example, if an owner of four medallions has a $500,000 loan on each medallion ($ 2 million in total debt), they can participate in MRP. But the owner of ten medallions, owing $5 million, would be ineligible for relief and likely face foreclosure, putting these medallions in the hands of the large lenders. This distinction is arbitrary and serves neither the medallion industry, the public, nor those small businesses the Executive Order intends to protect. Ther only difference between the debt of the owner of a few medallions, and the debt of an owner of a greater number of medallions, is the size of the debt. Indeed, the greater the debt, the fewer avenues that are available for repayment. Foreclosure of medallions by lenders is never good for the stability of the medallion industry. Every medallion owner is affected by the declining price of the medallion, the concentration of ownership in the hands of a few investor lenders, and the overall health of the industry. Addressing foreclosures that each medallion owner potentially faces should be a concern of the Commission, consistent with the Mayor's Executive Order.

Finally, inasmuch as the Executive Order requires the City to ensure that it is not "creating undue hardship for honest small businesses," we urge the Commission to review its regulatory and enforcement environment to foster a collaborative and cooperative environment with the entities it regulates, rather than an adversarial environment. One example is the handling of consumer and other complaints filed against licensees with the Commission. When the TLC receives a complaint, the Prosecution Unit often issues a summons or a directive with first contacting the licensee (such as a taxicab owner, agent, broker, meter shop, or base). While there are many times adjudication of a dispute and imposition of penalties is necessary, and there are instances where public safety mandates prompt action, disputes can often be resolved collaboratively and in a spirit of cooperation. For example, the City's main administrative tribunal, OATH, has developed procedures for the informal resolution of some disputes. We urge the TLC to consider ways that such informal resolution processes can be utilized before summonses and hearings are utilized.

The taxicab and for-hire industries need not have an adversarial relationship with the TLC, or with drivers. Without drivers, we cannot provide the service the public needs. Ands without the confidence of the public, there would be no taxicab or for-hire industry. We all need to work together. Ther industry wants safe drivers who are adequately compensated. We want passengers who can rely on service in licensed vehicles. And we only want licensed vehicles and drivers on the road.

The Mayor's Order correctly notes the burdens small businesses face. As an industry of almost exclusively small businesses, we support the TLC in its efforts to relieve administrative and other burdens facing these businesses and look forward to working with the Commission to make this a reality.

Respectfully submitted,

Peter M. Mazer
General Counsel

From:	Oleg Fatakhov
To:	tlcrules (TLC)
Subject:	[EXTERNAL] TLC hearing
Date:	Thursday, August 6, 2026 2:02:17 PM

Sent from my iPhone I think TLC should allow drivers to use hands free devices like EarPods and not to fine them for this . Plus Uber and Lyft pay us 68 cents per minute I think it would be fair to pay 99 cents per minute

From:	Thomas X.
To:	tlcrules (TLC)
Subject:	[EXTERNAL] Public Comment: Driver Relief Penalty Reduction and MRP Proposed Rule
Date:	Thursday, August 6, 2026 2:33:35 PM

Dear TLC Commissioners and Policy Team,

Iam a licensed TLC driver in New York City, and I am writing to submit my public comments regarding the proposed rules on penalty reductions and to share critical feedback on current industry conditions.

First, regarding Penalty Enforcement and Reductions, I strongly support lowering fines and advocate for a more reasonable, discretionary enforcement policy. Drivers frequently face unavoidable situations—such as briefly holding a phone to notify a passenger who is late, or temporarily double-parking/using a bus lane because the rider's selected pickup location is blocked or unsafe to stop. These technical violations often occur out of necessity to provide safe and complete service. I urge the Commission to consider context and reasonable exemptions for drivers acting in good faith under these specific circumstances.

Second, regarding TLC License Issuance and Leasing, the current cap on new TLC vehicle licenses has created an unfair market where non-driving license holders lease out permits for high passive income, while active, hardworking drivers are forced to pay exorbitant rental fees just to earn a living. I respectfully request that the TLC consider reopening license applications for active drivers, while establishing a mechanism to review or cancel licenses held by individuals who no longer operate in the industry.

Third, regarding Ride-Share Platform Fare Splits, high commission rates charged by platforms like Uber remain a severe burden. On many trips, the platform's take rate is exceptionally high—sometimes even exceeding what the driver receives for providing the service and covering fuel, maintenance, and vehicle wear-and-tear. I strongly urge the TLC to intervene, establish reasonable caps on platform commission rates, or adjust minimum driver pay formulas to protect drivers' net income.

Thank you for your time, consideration, and continued efforts to improve working conditions for New York City's driver community.

Sincerely,

From:	Sogui Samb
To:	tlcrules (TLC)
Subject:	[EXTERNAL] Fine reduction
Date:	Thursday, August 6, 2026 2:40:55 PM

To whom it may concern,
I think it's a great idea to help drivers in these difficult times by reducing the fines that they are exposed to too. For instance a reduction or 50% or 35% would be a great relief to all of us . Tickets are very expensive and due to inflation as well it's getting harder and harder to get income that helps us to cover our monthly expenses.
Thank you
TLC License : 5557219

From: Dady Hamel
To: tlcrules (TLC)
Subject: [EXTERNAL] Comment
Date: Friday, August 7, 2026 2:59:15 AM

First, I'd like to thank the NYTWA for its continued effort to fight for our rights, economic justice and structural reform. Without NYTWA we taxi workers would not have a voice. Thanks again a million to the NYTWA. I can say as a yellow taxi medallion owner, I see no hope for survival at all in this business. Most yellow taxi drivers even though they know they would spend at least 4 hours at the taxi lot at the airport before they get a fare still choose to wait that long before they get a fare. The reason for that is because it is impossible to work on the streets. You drive 36 miles per hour, it costs you 50$. We all are well aware It's almost impossible to avoid driving 36 miles per hour in a 25 mph zone. Not too long ago a police stationed right at the bottom of a highway ramp to issue speeding tickets because he's well aware you will be driving 36 mph exiting the freeway. So unfair. It is also impossible to avoid the bus lanes because passengers hail a cab right on the bus lane. And at times you can't even tell you're driving on a bus lane. You pass the passenger by, now you stand a chance of being reported for refusal. A refusal violation can run you up a 1000 dollars plus a month suspension. Just for the past month I had 5 bus lane violations which ran me 850$. It seems like every traffic rule this city has implemented has a negative impact on the yellow taxis. On march 29th 2025, an insane driver drove through the midtown tunnel in the opposite direction hitting my car head on. My car was totally destroyed. Even though I was not at fault, my insurance company raised my insurance threefold from 365$ to 962$. I basically find myself working for the insurance company and traffic tickets that are impossible to avoid. This city is all about greed is all I can say. This is utterly a very sad situation. I don't think anyone would be able to convince me this city is not trying to do away with yellow cabs.

Sent from my iPhone

From:	MD JABER HUSSAIN
To:	tlcrules (TLC)
Subject:	[EXTERNAL] Support for the Proposed TLC Rules
Date:	Friday, August 7, 2026 6:37:53 AM

Dear New York City Taxi and Limousine Commission,

I strongly support the proposed rules to reduce fines and fees for TLC licensees. Thank you for considering these changes.

As a full-time TLC driver, I can say that the rising cost of living, vehicle expenses, insurance, maintenance, fuel, and other operating costs have made it increasingly difficult for drivers to earn a decent living. Reducing unnecessary fines and fees would provide meaningful financial relief and help many hardworking drivers continue serving New Yorkers.

I respectfully encourage the Commission to adopt these proposed changes. I also hope the TLC will continue looking for additional ways to support drivers, improve fairness, and ensure that all professional drivers have a sustainable opportunity to earn a living while providing safe and reliable transportation.

Thank you for listening to the voices of drivers and for your continued efforts to improve the industry.

Sincerely,

MD Jaber Hussain
TLC Licensed Driver
New York City

From:	Kooraock Ock
To:	tlcrules (TLC)
Subject:	[EXTERNAL] Urgent Concerns from NYC TLC Drivers Regarding Empower, Driver Income, and Insurance Coverage
Date:	Friday, August 7, 2026 9:43:21 AM

Dear New York City Taxi and Limousine Commission,

I am writing as a TLC-licensed driver to express serious concerns shared by many drivers in New York City.

The cost of living in New York has become extremely difficult. Many of us have children and families to support, along with rent, food, commercial insurance, vehicle payments, maintenance, TLC expenses, and other bills. Driving is how we provide for our families.

For many drivers, Uber and Lyft are no longer providing enough work or income to cover these expenses. Drivers can spend long periods waiting without a trip, while our expenses continue every day. This situation has created enormous financial pressure and stress for many TLC drivers.

This is one of the reasons many New Yorkers and TLC drivers have started using Empower. Whether TLC agrees with Empower's business model or not, the reality is that the platform is being used in New York City, and TLC-licensed drivers are currently providing rides through it.

We need clear guidance from TLC about what this means for drivers.

Our most urgent question concerns accidents and insurance. If a TLC-licensed driver who has TLC/commercial insurance is driving an Empower passenger and, God forbid, an accident occurs, what exactly happens?

Who is responsible for the passenger? Which insurance is expected to respond? What happens to the driver's TLC license and vehicle? Does TLC consider the driver to be operating without the required coverage simply because the passenger came through Empower? What should a driver do immediately after such an accident?

Drivers should not have to discover the answers to these questions only after an accident occurs.

We are asking TLC to publish clear written guidance explaining the accident and insurance process for TLC-licensed drivers using Empower. Drivers need to understand the potential consequences before accepting a trip, particularly when passengers are involved.

We also ask TLC to recognize the economic reality facing drivers. Uber and Lyft have enormous influence over our livelihoods, and many drivers feel that they have very little power when dealing with these companies. TLC is the agency that regulates our industry, and drivers need TLC not only for enforcement, but also for protection, transparency, and fair treatment.

We are working—not looking for handouts. We are trying to earn an honest living, support our children and families, and pay the extremely high cost of living in New York City.

Please provide drivers with a direct and clear answer regarding Empower:

If a TLC-licensed and commercially insured driver has an Empower passenger in the vehicle and an accident occurs, what is the exact legal, insurance, and TLC process that follows?

We respectfully ask TLC not to leave thousands of drivers uncertain about something this serious. Clear guidance could protect drivers, passengers, and the public.

Thank you for considering the concerns of New York City TLC drivers.

From: Lloyd Dinma Nwankwo
To: tlcrules (TLC)
Subject: [EXTERNAL] Aug 13, 2026: Public Hearing Comments (TLC ID 578-4075)
Date: Friday, August 7, 2026 11:32:37 AM

Dear TLC:

Thanks for the opportunity to participate in this emailed public hearing comment. I was just informed that it does not preclude me from giving an abridged oral testimony on the date of the hearing. I plan to do so.

I have served six years as an FHV driver and currently three years as a yellow cabbie.

Without question, I support this current proposal to remove fines for lateness regarding the annual mandatory drug test.

HOWEVER, I feel there's an elephant in the room that renders it precocious.

I have discussed this elephant with the prior Commissioner, David Do. He is on the record as deeming my findings credible in emails. He did promise to discuss it with members of a group then. Yet, no action was taken

Prior to Madam Commissioner's appointment, I left a detailed message on her consulting website and in the drivers survey regarding this elephant.

For the sake of analogy, lets envision a scenario where you have a large corporation that has the unfortunate situation where its female employees are being sexually harassed by the male ones. Consequently, the female employees often take time off work due to this toxic environment. However, the company not only has a policy of looking the other way, but terminates the employment of any such employees who take time off.

Then over the course of time, a new CEO arrives. It's a woman and so understandably she is not pleased. She then comes up with a proposal: The good news is any female employee who is sexually harassed can take as much time off as needed and return when whole, without fear of employment termination. They just won't be paid.

This would be deemed absurd. The critical issue which is the harassment remains unaddressed. It should not be happening at the company at all. And just like the example given, the move to remove fines etc., for not promptly complying with the annual mandatory payment drug test is a consolation prize.

The TLC should not have an annual mandatory drug test.

This annual mandatory drug test imposed on the roughly 200k active drivers is extortionary:It is both unnecessary and ineffective.

It is UNNECESSARY because the NYPD officers who patrol around and deal with public do not have such a policy. School bus drivers who shuttle kids to and from school don't. Neither does the MTA, whose train operators, bus drivers and conductors who commute hundreds of thousands of people .

Even corporate America generally has no parallel policy in place. Yet, all these groups are fully functional.

For any drug test to be EFFECTIVE in weeding out bad elements, it has to be adminstered randomly. Yet, this is a test set at a certain time window of the year. The TLC Driver gets to pick the time, date and venue to suit his or her convenience. Initially, Comissioner Do stated to me that if we had random testing, people would complain. He didn't sound like he believed himself.

It is at least highly quixotic to expect a driver who ingests banned substances would schedule this test when he or she is under the influence. Or won't take steps to abstain for to attain a clean system and sail through the test.

So the question begs to be asked. Why have this test? Why are TLC drivers so different.

The answer is simple. They aren't.

Labcorp, the corporation that administers this test charges roughly $35 to do so. This is up from $32. It charges this to EACH and EVERY one of the 200,000 active drivers.

We are talking 7 million dollars per annum. This would mean that in my nine-years as a TLC driver alone, a staggering sum of 60 million dollars has been transferred from the backs of sweaty and hardworking immigrants, who slave an average of 60 hours weekly, to feed their families on the road, to LabCorp corporation.

Clearly, this is extortion occurring in broad daylight. It also smells of corruption and kickbacks.

There are two credible options.

The TLC should elucidate why this test is necessary to the public. Then and only then move forward. Or have this annual mandatory test scrapped immediately.

As it stands now, the rationale behind keeping this test in place, is similar in motif to that of President Trump's Muslim ban.

Substantively, to apprehend a nefarious subgroup, one subjects the broader group to a draconian and unfair treatment.

In all fairness to you all, you are mainly composed of professional beauracrats and liberals. I sincerely doubt that anyone one of you has ever owned or managed a credible business. I am certain if they gave anyone of you a brand new Totoya Sienna with no issue whatsoever and a TLC license, to drive around the city and earn a living. All hell would break loose.

So, you are shielded from the repercussions of your policies. It would be news if you had technical backgrounds. Instead you hail from field of law, education, journalism etc. Because society easily conflates being intelligent with being articulate, many of you are presumed to be intelligent and sail ahead.

Because you are often insulated, you can afford to pass these ever increasing sanctimonious policies. This explains why and how you would ban the usage of cellphones, via the Bluetooth enabled dashboard, in the vehicles.

It is unimportant to you that the drivers cannot communicate with their loved ones, even when alone in the vehicles. It doesn't matter that they often drive 12 hour shifts. Yet, by the time you have finished reading this email, at some point many of you will stare at your cellphone devices. When they get an emergency on the Van Wyck, they should probably pull over.

As I write this, I am in litigation with the Empire Hotel NYC. In a nutshell, I was hailed by one of the bellmen for a JFK fare As usual, there were other taxis parked outside. They represented one end of the racketeering equation. It appears he pulled me over as those vehicles were sedans and mine was a larger WAV Ford Transit with plenty of room to accomodate the party of four. I got out and relocated my belongings to the truck to make the front passengers chair available while he loaded in the luggages.

As I was about to luggage. drive off, he looked at me puzzled and notified me that a JFK fare was $10. I refused to pay.

Ultimately, he removed the luggage and transferred the guests to another taxi driver who gladly complied with his extortionary demands. He had transferred my bag that included my cellphone to the other car which then took off. (He saw me put my bag in the trunk). This was also captured on camera.

I emailed my experience to your drivers protection unit. Can you guess if they even replied?

At the risk of getting political, this explains how a gentleman can be accused of committing horrible atrocities, including sexual assault and yet win an election again. Many believed he felt their pain.

I'm an evangelical Christian. You remind me of the pharisees in the bible that Jesus called out for piling laws upon laws on the backs of the people. Yet, they themselves obeyed none. You belong to the demographic conplain to your friend on your cellphone that your Uber is late.

It saddens me to say this. But you come across as very evil and inhumane people.

From:	nini abou
To:	tlcrules (TLC)
Subject:	[EXTERNAL] Public Comment on Proposed Rules – Driver Protections, Unfair Passenger Complaints, and Pay Rates
Date:	Saturday, August 8, 2026 12:40:27 PM

To the Taxi and Limousine Commission (TLC),

I am writing to submit my comments regarding the proposed rules and to highlight critical issues that TLC drivers are facing daily in New York City.

While I welcome the Commission's efforts to reduce fines and fees for licensees, there are urgent systemic problems affecting our livelihood and well-being that need immediate action:

1. **Unfair and Deceptive Passenger Complaints:** Drivers are increasingly subject to false or unverified complaints submitted by passengers through app platforms like Uber. Passengers frequently exploit the complaint system to obtain refunds or free rides, while drivers face immediate account suspensions, loss of income, and potential administrative actions without due process or a fair investigation. The TLC must establish stricter guidelines and protection mechanisms to shield drivers from baseless rider claims.
2. **Low Pay Rates and Rising Operating Costs:** Current pay rates do not reflect the heavy financial burden drivers carry. With high vehicle maintenance costs, insurance rates, fuel expenses, and overall inflation, current net earnings are insufficient to sustain a decent living. Lowering administrative fines is a positive step, but fundamental adjustments to minimum driver pay and fare rules are necessary to ensure drivers earn a truly liveable wage.
3. **Driver Well-being and Mental Strain:** The combination of low earnings, constant fear of unfair deactivation or complaints, and long working hours creates an untenable level of stress for drivers. Drivers deserve a fair, transparent, and supportive regulatory environment where their hard work is respected.

I strongly urge the Commission to implement stronger driver protections against unfair rider complaints and to evaluate driver pay structures to ensure fair compensation across all platforms.

Thank you for your time and consideration of these critical driver concerns.

Sincerely,

Youssef Elghalide

From: franklinflorentino1277@gmail.com
To: tlcrules (TLC)
Subject: [EXTERNAL] Support for Proposed Rules - TLC Public Hearing August 13, 2026
Date: Monday, August 10, 2026 6:12:59 AM

Enviado desde mi iPhone To: Taxi and Limousine Commission
Via: nyc.gov and Email

Dear Commissioners,

My name is Franklin Florentino, and I am a licensed TLC driver operating in New York City.

I am writing in SUPPORT of the proposed rule dated August 06, 2026 to reduce fines and fees that are negatively affecting TLC licensees and to update the Medallion Relief Program.

High fines and fees create an enormous financial hardship for drivers who are already facing high gas, insurance, and maintenance costs. This proposal brings fair and much-needed relief to thousands of drivers and their families.

I respectfully request that the Commission vote YES to approve this rule at the public hearing on August 13, 2026 at 10:00 AM, 33 Beaver Street, 19th Floor.

Thank you for listening to drivers.

Respectfully submitted,

Franklin Florentino

From:	Anthony G. Ventura
To:	tlcrules (TLC)
Subject:	[EXTERNAL]
Date:	Tuesday, August 11, 2026 1:29:46 PM

First point: You need to stop issuing plates to corporations that put hundreds of vehicles on the streets every day. In addition, the dealerships are full of cars with plates, and the taxi market is becoming more and more saturated because of the excessive number of vehicles.

Second point: The apps do whatever they want to us taxi drivers, and you are doing nothing about it. A clear example is Lyft's new update: when we enter New Jersey, they no longer pay the toll immediately. Now we have to wait until the next day, and when we check, the toll often has not been paid. When we contact them, they always have an excuse, and we end up losing the money for the toll. What is even more concerning is that this problem seems to happen with the more expensive tolls, while the cheaper tolls are paid immediately.

You are supposed to protect the well-being and interests of taxi drivers, but instead, you have become our biggest headache. It seems that you are only focused on issuing tickets, while we do not see you defending or protecting us from the problems we face every day.

From:	SadioYaYa barry
To:	tlcrules (TLC)
Subject:	[EXTERNAL] Medallion issues,
Date:	Tuesday, August 11, 2026 12:12:20 PM

You don't often get email from barrysadio72@gmail.com. Learn why this is important

Hi,
Here is my concern as a Tlc licensee and driver. I am wondering how a driver can lease a medallion for years working hard and never ever get a chance to own a medallion. It should be a programm to encourage any driver who works for any garage for several years to apply and own a medallion.

Your attention about this matter will be much appreciated.

Thank you,

Yaya Barry
5322273
6E79 QML

Driver Relief Penalty Reduction, Medallion Relief Program, Undercover Enforcement Practices, and Professional Conduct at TLC Facilities

Submitted to: New York City Taxi and Limousine Commission Office of Legal Affairs 33 Beaver Street – 22nd Floor New York, NY 10004

Re: Request for Meaningful Reduction of TLC Fines, Penalties, Licensing Fees, and Review of Enforcement and Driver-Interaction Practices

Introduction

I respectfully submit this comment in support of the New York City Taxi and Limousine Commission's effort to provide meaningful financial relief to TLC licensees. The proposed Driver Relief Penalty Reduction and Medallion Relief Program presents an important opportunity to address the financial pressures facing TLC drivers, vehicle owners, and small transportation businesses.

1. TLC Licensees Are Small Business Operators

TLC drivers and vehicle owners operate as independent workers or small businesses. Their income depends on maintaining active licenses, vehicles, insurance, and regulatory compliance. A single violation can trigger:

- Fines
- Lost driving time
- Administrative appearances
- Vehicle repair costs
- Insurance increases
- Licensing and renewal expenses
- Inspection fees
- Possible suspension
- Loss of income

These burdens accumulate rapidly and often exceed a driver's ability to pay.

2. Proportionate Penalties

Many TLC penalties begin at **$400 or more**, even for technical or administrative violations. Enforcement should encourage compliance—not impose financial hardship that forces drivers out of the industry.

A graduated penalty structure should distinguish between first-time, corrected, technical, safety-related, repeated, and intentional violations.

3. First-Time Cure Opportunities

TLC should expand warnings, cure periods, reduced penalties, and educational resolutions for first-time violations that do not involve immediate danger.

4. Review of the $252 Driver License Renewal Fee

The $252 renewal processing fee, combined with drug testing and course requirements, creates a significant recurring burden. TLC should consider reductions, hardship options, installment plans, and incentives for clean records.

5. Vehicle Licensing and Inspection Costs

Vehicle owners face substantial recurring expenses, including:

- $550 vehicle renewal fee
- $75 inspection fee
- $800 Commercial Motor Vehicle Tax

These costs should be reviewed and reduced where appropriate.

6. Inspection and Reinspection Fees

Inspection fees should encourage compliance, not impose excessive penalties. Reduced reinspection fees, warnings for minor issues, and clear online guidance would improve fairness.

7. Distinguishing Safety Violations From Administrative Violations

Serious violations should receive strong enforcement. Technical mistakes corrected promptly should not carry penalties comparable to safety violations.

8. Suspension Consequences

Suspensions often cause greater harm than fines. Alternatives should be considered when violations are promptly corrected and do not involve safety risks.

9. Clean-Record Incentives

A Clean Record / Good Standing Program would reward long-term compliance with reduced fees and penalties.

10. Hardship Reduction Program

A formal hardship program should assist drivers facing serious financial difficulty due to circumstances beyond their control.

11. Payment Plans

Reasonable payment plans should be available for drivers unable to pay large fines immediately.

12. Coordination of Government Charges

TLC should work with other agencies to reduce duplicate charges, improve notices, and offer consolidated statements.

13. Transparency and Predictability

TLC should maintain a clear, accessible fee and penalty schedule detailing all fines, cure periods, suspension consequences, inspection fees, and administrative charges.

14. Comprehensive Review of TLC Fees and Penalties

TLC should conduct a broad review of driver, vehicle, and enforcement-related costs to ensure they remain reasonable and proportionate.

15. Undercover Enforcement Operations

Undercover enforcement is important, but penalties resulting from undercover-initiated transactions can reach **$1,000 or more**, even for first-time violations involving no passenger harm.

TLC should provide clearer guidance, proportional penalties, warnings, transparency, airport enforcement review, and aggregate data reporting.

16. Professional Conduct at TLC Inspection Sites and Main Offices

Many drivers report disrespectful treatment at TLC inspection facilities and main offices, including yelling, abrupt commands, and hostile communication.

TLC should implement:

- Professional conduct standards
- Customer-service and de-escalation training
- Clear signage and instructions
- Accessible complaint processes
- Increased supervisory oversight
- Recognition of driver stress and economic pressure

Respectful treatment improves compliance and strengthens the agency's mission.

Conclusion

TLC drivers and vehicle owners are essential to New York City's transportation system. Enforcement should be fair, proportional, transparent, and designed to encourage compliance—not create financial barriers that make compliance unattainable.

I respectfully urge the Commission to adopt broader and deeper reductions in fines and fees, expand cure opportunities, review undercover enforcement practices, and ensure professional conduct at all TLC facilities.

From:	Patricio Guzman
To:	tlcrules (TLC)
Subject:	[EXTERNAL] Accessibility and Enforcement for TLC Driver Pickups
Date:	Thursday, August 13, 2026 10:47:07 AM

Good morning,

My name is Patricio Guzman, and I have been driving in New York City for over five years. Thank you for giving TLC drivers the opportunity to share our experiences and concerns.

I would like to raise an issue involving accessibility and enforcement when picking up passengers with limited mobility, disabilities, or limited vision.

Sometimes, a bus stop or bus lane may be the safest and most accessible location for these passengers to meet their driver. Side streets can be congested with parked vehicles, delivery trucks, loading activity, and other traffic, making it difficult or unsafe for a passenger with limited mobility or vision to reach another pickup location.

As TLC drivers, we want to help these passengers and provide them with safe transportation. However, when we stop in these locations, drivers can receive tickets or fines through bus-lane camera enforcement or from enforcement officers. This creates a difficult situation: the passenger needs accessible transportation, while the driver needs to comply with the rules and avoid being penalized.

I respectfully ask the TLC and the City to work with drivers to explore a clear and practical solution for these situations. There should be a way for drivers to safely and legally assist passengers who genuinely need an accessible pickup location without being unnecessarily penalized.

Accessibility and safety should work together, not against each other.

Thank you for your time and for considering the perspective of TLC drivers.

From: ron sedanz.com
To: tlcrules (TLC)
Subject: [EXTERNAL] Proposed Rules Comment
Date: Thursday, August 13, 2026 6:49:54 PM

Hello,

My name is Ronald Gil, TLC licensed driver, vehicle and base owner. I would like to comment on the proposed rules and how it's currently affecting me.

For context, currently, my base is being fined for driving Under suspension. I'm the driver that was suspended. As one of the most licensed individuals that pays so many fees to the TLC, I find this erroneous. The reason for the suspension was because I didn't attend one for the phone court hearings. I attended the first one but the witness for the TLC officer didn't show. The second time, I couldn't make it so I was under the impression I would get the same courtesy and get another hearing. Technically I did but even without due process, my driver TLC license was suspended. I'm not going to stop working (driving on this case) for something I know I was not guilty of.

And the whole reason I even was summoned? Because someone on the street sent a picture to TLC with my vehicle parked on a sidewalk. Seriously? A licensed driver driving on a sidewalk? We know better. What happened was that I simply took my car to a car wash on 11th Ave and 46th street (where many TLC drivers go). And when I went to get my car, the car wash attendant parked out on the sidewalk to dry it. This could have been handled with a simple email or phone call. The third time when I got the email to appear unfortunately I couldn't make it. So I replied via the online form. I got an email stating that my case was not qualified for online hearing. Even though sidewalk obstruction was one of the categories listed. So finally I just decided to pay the $50 to make this go away.

Now because I'm also the base owner, with all my permits and doing the right thing still getting fined? Please stop using licensees as your cash register. Go after unlicensed operators (which I can name plenty) and hustlers that actually take away the work from licensed individuals. Look at what Westchester is doing. I also have those licenses and they fine unlicensed operators way more than what NYC does.

The new fine I'm facing is either $925 settlement or $3700 if found guilty. For a small business on top of licensing, taxes, insurance, payroll and vehicle expenses, this makes it so hard to operate in the city and makes me question why even bother with your licenses. I would be bothered much less not having them since so many out there don’t have to bother submitting trip records. The mechanism that you enacted is what caused this extra fine. Simply by reporting every month.

I hope this reaches someone and maybe get some relieve from these pending fines.

Ron Gil
Sedanz

Address 2 Overhill Road, suite 400, Scarsdale, NY 10583
Phone 2123006083
Email ron@sedanz.com
Website www.sedanz.com/

Check our article on Business Traveler USA

Schedule a free travel consultation and assessment for your principal or organization

From:	Zubin Soleimany
To:	tlcrules (TLC)
Cc:	Bhairavi Desai; Alli Langley
Subject:	[EXTERNAL] NYTWA Comments on 8/13 Rule Proposal
Date:	Friday, August 14, 2026 9:25:34 AM
Attachments:	8.13 NYTWA Rulemaking Comment FINAL.pdf

Hello,

Attached, please find the NYTWA's comments on the proposed rules considered at the August 13 public hearing.

Thank you,
Zubin Soleimany

--
Zubin Soleimany
Senior Staff Attorney
New York Taxi Workers Alliance
31-10 37th Avenue, Suite 300
Long Island City, NY 11101
www.nytwa.org

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

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

August 13, 2026

Dear Chair Valdivia and Commissioners,

The New York Taxi Workers Alliance (NYTWA) submits these comments in response to the proposed rules amending driver penalties and the Medallion Relief Program rules.

AMENDMENTS TO THE MEDALLION RELIEF PROGRAM RULES

The NYTWA supports the TLC's move towards allowing transfers of loans within and the removal of partners from loans covered by Medallion Relief Program+. However, the rules must be modified to:

- Allow transfer to any individual with an interest in six medallions or less;
- Allow transfer when an individual seeks to restructure their business from individual ownership to a corporation or LLC, or vice-versa;
- Allow transfer where a loan is not current but a transferee has a payment plan approved by the lender to catch up on delinquent payments.

The Medallion Relief Program has been a resounding success: over 2,000 individuals and their families have received nearly $475 million of debt relief. As the Statement of Basis and Purpose for the proposed rules make clear, the MRP+ was implemented to "to support the recovery of the yellow taxicab industry in New York City by providing financial assistance […] to help medallion owners negotiate with lenders to reduce loan balances and lower monthly payments." Statement of Basis and Purpose (Aug. 13, 2026). Meanwhile, TLC intends the proposed rule change to "ensure TLC's ongoing commitment to small business owners and contribute to the financial health of the medallion industry and the City of New York." *Id.* These are laudable goals, and allowing transfers to any individual with an interest in six medallions or less will allow this work to continue.

The proposed rules' limitation of transfers to spouses and children is irrational: the TLC has provided no rationale for the limitation, and given the stated industry-wide goals of the MRP+, this limitation does not further program's aims. This is particularly true given driver demographics: 96% of drivers in the yellow cab sector are immigrants. *See* TLC Factbook (2020), available at https://www.nyc.gov/assets/tlc/downloads/pdf/2020-tlc-factbook.pdf (Date Accessed: Aug. 10, 2026). As a result, it is not uncommon for owner-drivers to have spouses or children who live outside of the country, making it impossible for them to take on a medallion loan. On the other hand, allowing all transfers where the transferee has an interest in six medallions or less is in line with the original MRP+ grant requirements, thus furthering the intent of the program to assist small businesses. *See* 35 RCNY § 58-51(b)(2).

Such a rule also would also benefit the City: in most cases, if a medallion owner covered by the City-backed guarantee cannot transfer the loan, they would default, leading the City to pay any balance that remains on the medallion after a sale. However, if transfers are allowed, the City's overall liability is reduced. Should a transferee ultimately default, the balance will likely be less than it would have been prior to the transfer, as the transferee will have paid down the loan via monthly payments. Defining allowed transferees as broadly as possible while keeping the requirements in line with MRP+'s overall goals benefits the City.

In addition to the changes around eligible transferees, the City must also allow medallion-owners to transfer ownership where they seek to form an LLC or corporation or convert from an LLC or corporation to owning it in their own name. There is no reason to limit such transfers; such a rule would allow medallion owners to structure their legal and financial risk and liability in the manner they see fit while still having access to the life-saving relief of the MRP+. The TLC plainly recognizes the value of different ownership models, as the Owner Driver Resource Center has historically offered workshops about the pros and cons of being an LLC or corporation. *See* 2024 Office of Financial Stability Report, available at https://www.nyc.gov/assets/tlc/downloads/pdf/ofs_annual_report_2024.pdf (Date Accessed: Aug. 10, 2026). Allowing such transfers is a commonsense modification of MRP+.

Finally, the TLC must allow transfers to be made where the loan is not current as long as a payment plan approved by the lender is in place. Many medallion owners seek to sell or transfer medallions when they cannot work anymore; while some owner-drivers may be able to plan for such a transition, others are forced into retirement suddenly, or after periods of illness or other life changes when they may have fallen behind on payments. Allowing transfers in these instances again serves only to benefit the City, as it reduces the City's overall liability.

AMENDMENTS TO PENALTY AMOUNT RULES

The NYTWA Supports The Repeal of Penalties Outlined in the Proposed Rules, and Encourages TLC to Engage In the Comprehensive Review of Penalties Mandated by Executive Order 11.

The NYTWA writes to support passage of the proposed rules which eliminate burdensome penalties where TLC already imposes suspension on drivers. We are heartened to see TLC recognize the principle that, in most cases, license suspension and a fine need not be imposed simultaneously. Adding a civil penalty at the same time the TLC suspends a license pending compliance, which takes away a driver's ability to earn money to pay the fine is unnecessarily punitive.

That said, this practice, and other overly punitive fines remain on the books throughout TLC's driver and vehicle owner rule chapters; unfortunately, the proposed rules merely provide an example of the type of reforms that TLC should make universal across its driver rulebooks. The proposed rules invoke Mayor Mamdani's Executive Order 11, but they fall far short of the "comprehensive inventory of all civil penalties" required by EO 11 and its mandate to review whether such penalties are appropriate.

While the NYTWA appreciates these important first steps towards a more equitable regulatory framework for drivers, we urge TLC to undertake the comprehensive review of penalties contemplated by EO 11 and revise its rules accordingly. Some of the issues that TLC should address in such a review are as follows.

The TLC Should Conduct a Universal Review of Its Fine Amounts And Make Driver Fine Amounts Proportionate to Workforce Earnings

TLC driver fine amounts are not commensurate with workforce earnings. TLC drivers make less than half of the average New York City private sector worker's pay: while TLC's High-Volume Driver Pay rules aim to pay drivers $21.78/hour after expenses, the average hourly pay for private sector workers in New York City in June 2026 was $44.81.[1] Yet despite making less than half the typical New Yorker's pay, TLC drivers have to pay more than twice as much as regular New Yorkers when ticketed by TLC for the same violations as other motorists. TLC drivers pay $200 or more for parking violations that typically cost a regular New Yorker $65-115.[2] A turn signal violation that would total around $200 in DMV fines and surcharges carries a $300 fine when issued by TLC. Drivers earning far below the average income for New York City should not be charged fines that are more than triple the amount imposed by the Parking Violations Bureau, both to private motorists and even other drivers of commercial vehicles. TLC must conduct the type of comprehensive review of its penalties envisioned by EO 11 and revise its rules to reduce these fine amounts, where such amounts are not mandated by the Administrative Code.

Fines and Penalties Should Not, in Most Cases, Be Imposed Simultaneously

In most situations, the imposition of both fines and a suspension or revocation is disproportionate to the conduct at issue. As the proposed rules recognize, it is unnecessarily punitive to fine a low-wage worker and then take away their ability to earn money to pay the fine. While serious violations, such as unlicensed operation, merit the deterrent effect of fines, the potential for crushing fines and suspensions can occur on routine violations for minor misconduct. Why, for

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[1] *See* https://dol.ny.gov/current-employment-statistics-average-hourly-weekly-earnings (Adjust dashboard to "All Worker Hourly Earnings" for the industry "Total Private.")

[2] https://www.nyc.gov/site/finance/vehicles/services-violation-codes.page

example, should a driver found guilty of an "Acts Against the Public Interest" violation under Rule 80-12(e),[3] who faces a $1,000 fine also face up to a 30-day suspension? In most cases, economic loss from an appropriately scaled fine should be deterrent enough without piling more debt by rendering a worker unemployed. Rather, the combination of a suspension or revocation and monetary fines should be limited to specific circumstances where prescribed by local law, egregious violations, or where the seriousness of the allegations merit TLC seeking higher discretionary penalties at the OATH Trials Division, pursuant to TLC Rule § 68-02.

The NYTWA notes that penalties for unlicensed conduct and illegal operations should not be altered. Hustlers and unlicensed drivers are not part of the taxi and FHV workforce and serious fines are needed for deterrence of illegal operation that undermines public safety and the regulatory balance that aims to provide drivers with a decent income.

TLC Must Eliminate Range Penalties or Require Explanation for the Imposition of Penalties Beyond the Minimum

Currently, TLC rules allow for an exceedingly broad range of penalties for many rule violations. For example, both TLC rules concerning "Threats, Harassment, and Abuse" (§ 80-12(e)) and "Acts Against the Public Interest" (§ 80-12(d)), carry fines of $150-$350 and $350-$1000, respectively, plus 5-30 day suspensions. Here, it seems that TLC views the sub-e violation as comparatively worse than the sub-d violation, and thus carries the potential for a higher fine; yet both are subject to up to a 30-day suspension. The cost of a suspension to a driver far outweighs any civil penalty; for a driver who takes home $1500 in gross bookings every week, a 30-day suspension costs around $6000. This means that a driver found guilty of an 80-12(d) violation could face $150 alone, or a $350 fine and $6000 loss from a 30-day suspension. In this case the maximum penalty is ***more than 42 times larger*** than the minimum penalty; the $6200 gap between the two penalties seems to deserve at least some explanation, but neither TLC rules nor OATH rules or practice requires one.[4] This problem is exacerbated by the fact that neither TLC nor OATH rules contain any sentencing guidance, allowing hearing officers to impose maximum penalties with no explanation. Despite the potential for massive economic punishment, an OATH hearing officer does not need to "explain why she imposed the maximum penalty" where a rule provides for a range of penalties. *Taxi & Limousine Commission v. Epitome Taxi LLC, Lic. No. 7G51* (OATH-TLT Appeals Unit, August 23, 2012).[5] Although TLC must initiate a proceeding at the OATH Trials Division when it seeks a discretionary revocation (i.e., one not explicitly

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[3] While the rule's title seems to be reserved for violations of a serious and grave nature, we note that TLC uses this rule section, for example, to charge drivers for public urination, which, while conduct that should certainly be punished, is a violation that, outside the TLC context, merits only a $75 fine under the Ad. Code. NYC Admin. Code § 16-118(9)(c)(1).

[4] By way of comparison, in the federal criminal context, sentencing requires explanation; under the N.Y. Penal Law, while courts are also given discretion in sentencing, they do so within confined parameters. For example, the range of sentences for a Class E felony in New York is one to four years (N.Y. Penal L. §§70.00(b); (2)(e).

[5] While such a decision would likely not survive Article 78 review, it apparently continues to operate as the rationale for hearing officers imposing maximum penalties, including upon default, as discussed below.

authorized by the rules), a driver can be out of work for a month, solely at a hearing officer's unexplained discretion, even when TLC has not requested such a penalty. The rules must be amended to either eliminate discretionary suspensions in the Hearings Division context, or else create a framework where the severity of a penalty higher than the minimum must be explained.

Uneven Red Light Camera Summons Enforcement Between Vehicle Owners and Renters

The TLC must fix its uneven enforcement of red-light camera (RL) summonses. Currently, if a TLC driver who owns their vehicle receives a red-light camera notice of liability from the Department of Finance, and pays the DOF fine, and then receives a TLC RL summons for the same incident from TLC, the driver can present proof of having satisfied the DOF penalty and TLC will withdraw the RL summons. This happens because N.Y.C. Admin. Code §19-1004 requires the dismissal of any summons that is "substantively identical to a violation received for the same act."

However, TLC has created an uneven framework for prosecution that punishes vehicle lessees who have paid their DOF violations simply because they are lessees and not vehicle owners, leaving them subject to a $400 fine and 3 points on top of the fine already paid to DOF. When an FHV renter or taxi lessee commits a red-light camera violation, the DOF summons goes to the vehicle owner, but owners pass these costs on to the drivers. TLC knows this, of course, because its rules explicitly contemplate vehicle owners passing these costs on to drivers, and likewise contemplate records of such charges being maintained for compliance purposes. *See* TLC rule §§ 58-21(c)(5)(vi), 58-21(d)(2)(iv); 59A-21(c)(3)(i). Given that owners pass these costs on to the drivers, and must create records of payments by drivers, such proof should be sufficient for drivers to show that payment has been made and they, like owners, should not be fined twice for the same act.

Nonetheless, TLC prosecutors have taken the position, adopted by OATH, that a DOF summons issued in the name of the vehicle owner is not "substantively identical to a [TLC] violation received for the same act" issued to the driver. This analysis is incorrect both as a matter of the plain statutory text and the Council's legislative intent. The statutory language in §19-1004 emphasizes the ***substance*** of a summons in calling for dismissal of ***substantively*** identical summonses (not identical or merely technically identical). Likewise, the language is directed at summonses being issued for the same ***act***, its focus being on the same conduct being punished twice—not the mere technicality of same respondent being listed on a summons twice. The legislative history makes clear the Council's focus was on drivers avoiding being punished twice for the same conduct, not simply on addressing a technicality.[6] Because TLC rules allow owners to pass RL summons costs on to drivers, where there is proof of this, there is no reason for TLC

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[6] *See* Transcript of the Minutes of the New York City Council Committee on Governmental Operations (Apr. 26, 2018), at 41-42, available at https://legistar.council.nyc.gov/View.ashx?M=F&ID=6276252&GUID=12D800D4-EB11-451D-AFF9-192224B7AFB7 (Comments of lead sponsor of legislation codified at NYC Admin. Code § 19-1004 focusing on inherent injustice of a driver being punished twice for the same violation).

not to dismiss such summonses. TLC should promulgate rules clarifying that the scope of "substantively identical" means summons addressing the identical violation, and applies to drivers who were driving the vehicle subject to the DOF notice of violation and TLC summons, even if they are not the named vehicle owner in the DOF notice of violation, provided they can provide proof of payment.

Reverse Burdensome Fine Increases Imposed During the Adams Administration

Excessive penalties charged to drivers are not just the result of unreviewed policies that have been on the books for decades. Rather, TLC has recently continued to increase the penalties imposed on drivers for non-serious violations. In 2025, TLC increased the penalties for parking violations issued under TLC rules, despite the fact that drivers already paid up to ***three times more than other New Yorkers*** for the same parking violations. Currently, under rule 80-13(a)(1), TLC provides for a $200 fine for parking violations that cost other New Yorkers only $65-$115.[7] These penalties were expanded under the Adams administration to add penalty points for a second or third parking or non-hazardous moving violation within 15 months, and required a remedial education course for the third violation. Of course, drivers who violate parking regulations should be penalized, but TLC never articulated a rational basis for why TLC-licensed drivers should face fines unique to their workforce and higher than those paid by other motorists, despite earning far below the average New Yorker's earnings. The 2025 David Do parking violation rule changes should be reversed in their entirety.

TLC Must Amend Its Rules and Work with OATH to End the Practice of Overly Burdensome Penalties Imposed Immediately Upon Default.

The current interaction of TLC and OATH rules as well as OATH policies and processing time for motions to vacate currently makes it extremely difficult, if not impossible, for drivers to ever have their day in court after a default, even if they had a good reason for defaulting and have a defense to the charges against them.

Currently, OATH's general practice is to impose the maximum allowable penalties when a driver defaults. The imposition of maximum penalties is not required by OATH or TLC rules. A driver may default if, for example, they do not receive a summons in the mail, have a medical emergency. The problem with imposing maximum penalties, especially suspensions, upon default is that even in the best circumstances it takes time to file a motion to vacate and lift the suspension. That means, even after a successful motion to vacate, where a driver may ultimately be found not guilty or else reach a settlement not imposing a suspension, they will still face the penalty of lost work time that can't be avoided under the current framework. The immediate imposition of penalties is not necessary; except in cases where TLC seeks revocation and deems a drivers' continued licensure to be a threat to public safety, the suspension merely serves

[77] https://www.nyc.gov/site/finance/vehicles/services-violation-codes.page

punitive and deterrent functions, and is not intended to protect public safety. It makes no difference whether the suspension is served immediately upon default or at some later time.

The problem here is exacerbated by the fact that the current interaction of TLC rules and OATH practice make it practically impossible for some drivers to ever have their cases heard. The NYTWA understands that OATH currently takes 60 or even 75 days to process some drivers' motions to vacate.[8] OATH rules require payment within 30 days of service of a decision. 48 R.C.N.Y. § 6-18. TLC suspends drivers for not paying a fine within 40 days of its imposition. *See* TLC Rule 68-02(c)(2), (3). Although OATH rules (48 R.C.N.Y. § 6-21(h)) contemplate a potential refund of fines paid if a driver can prevail at the ultimate hearing, in practice, payment of a fine to TLC renders a case fully resolved and taken off the calendar. This means even drivers facing minor charges will face suspension if they want to have their case fully heard.

As it stands, the promise of a fair hearing on a motion to vacate is mostly illusory. TLC can fix this by amending Chapter 68 of its rules to require that penalties other than revocation will be imposed 30 days after a guilty finding,[9] and to stay the imposition of any penalties when a motion to vacate has been filed. We urge TLC to pursue these changes and to coordinate with OATH on further rulemaking and policy changes that allow drivers to have meaningful due process.

Thank you for your consideration of these comments.

Respectfully Submitted,

Zubin Soleimany
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Staff Attorney

[8] Historically, such motions were resolved in 1-2 weeks; even this amount of economic loss where a suspension was imposed can be avoided by simply delaying the suspension.
[9] This policy change would also allow drivers to appeal without having to face suspension pending an appeal that may ultimately succeed, which cannot be undone.