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The Honorable Corey Johnson  
New York City Council  
City Hall  
New York, NY 10007

**RE: First Quarter Report on Impact of Local Law 147 Moratorium**

Dear Speaker Johnson:

We are writing to you to report on the year-long moratorium on the issuance of new Taxi and Limousine Commission (TLC) for-hire vehicle (FHV) licenses for non-wheelchair-accessible vehicles pursuant to Local Law 147 of 2018 (Local Law 147), and our agencies' progress on studying the impacts of potential future policies to manage growth following the moratorium. Section 1(a) of Local Law 147 requires the Department of Transportation (DOT) and TLC to report to the Council quarterly on the impact of the moratorium on vehicle ridership throughout the city. Below we report on impacts during the first three months of the moratorium, from August 14<sup>th</sup> through November 14<sup>th</sup>.

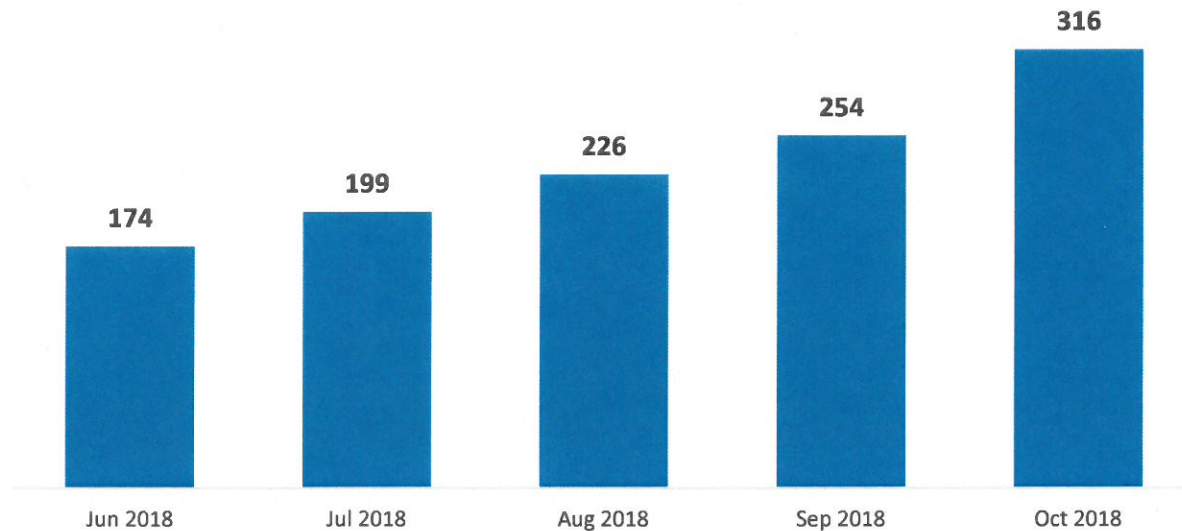
**FHV Licensing Volumes Before and After Enactment**

As outlined in Local Law 147, TLC stopped accepting new FHV applications on August 14<sup>th</sup>. In the weeks following Council's announced intention of a moratorium and before the enactment of Local Law 147, a total of 15,769 new FHV license applications were received by TLC. As of November 14<sup>th</sup>, 5,177 of these vehicles successfully demonstrated compliance with all safety requirements and TLC has authorized them to join the existing 110,000 FHVs already in service.

One important exemption to the moratorium in Local Law 147 allows for new licenses for wheelchair-accessible vehicles (WAVs). As FHV bases prepare for new TLC regulations going into effect in 2019 requiring improved accessible service, the number of total FHV WAVs has increased from only a few dozen a year ago to hundreds, as shown in Figure 1. During the first three months of the moratorium, TLC has received 151 applications for new WAVs. Expanding the number of WAVs will be key for FHV bases to meet future wait-time goals as part of the new regulations, and we will continue to update Council on progress in this important expansion of service.

Local Law 147 also granted an exemption for those drivers who have been leasing a vehicle under a conditional purchase agreement who ultimately take over the vehicle title. Because FHV licenses are non-transferrable, as title of the vehicle is passed from the lessor, the driver must obtain a new FHV license to continue to operate that vehicle for hire. This exemption allows for the driver to obtain an FHV license once vehicle title passes to the driver. During the first three months of the moratorium, TLC has received 94 applications for new FHV licenses under this exemption.

**Figure 1. FHV WAVs in Service by Month**



### **Renewal of Existing FHV Licenses**

One anticipated outcome of the moratorium was that more FHV owners would hold onto a license instead of letting a license lapse. Prior to the enactment of Local Law 147, roughly two-thirds of licensees with FHV licenses up for renewal decided to renew (67 percent in July 2018). For owners with licenses up for renewal in both August and September 2018, 69 percent have renewed so far. TLC provides a grace period of 60 days after the license expiration date, so these preliminary numbers may increase over time.

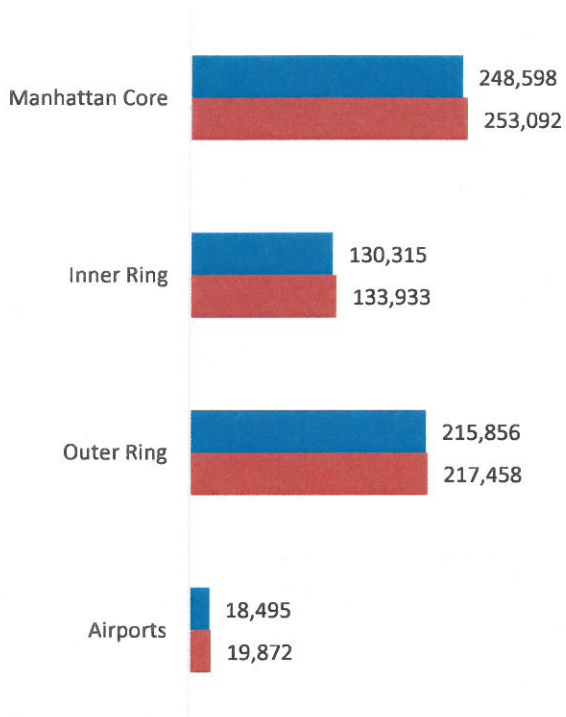
### **Ridership in the First Quarter of the Moratorium**

Our analysis of the impacts on ridership during the moratorium focuses on two key metrics—average daily trips performed and average wait times. The most recent data on trips covers service through the end of September, representing the first month and a half since Local Law 147 was enacted. Figure 2 shows the number of daily trips performed during this time compared to the month and a half before the moratorium, broken out by the Manhattan Core, Inner Ring, and Outer Ring areas. It is too early to tell the impacts of the moratorium, which is just part of a larger effort to stabilize growth in the FHV industry. During the moratorium, TLC and DOT are evaluating options for future policies to reduce the negative impacts of FHV on transit ridership, congestion, and emissions while protecting service availability and driver welfare. TLC and DOT are already working closely on this analysis with a team of transportation engineers and economists to evaluate options for a growth control mechanism to institute following the moratorium.

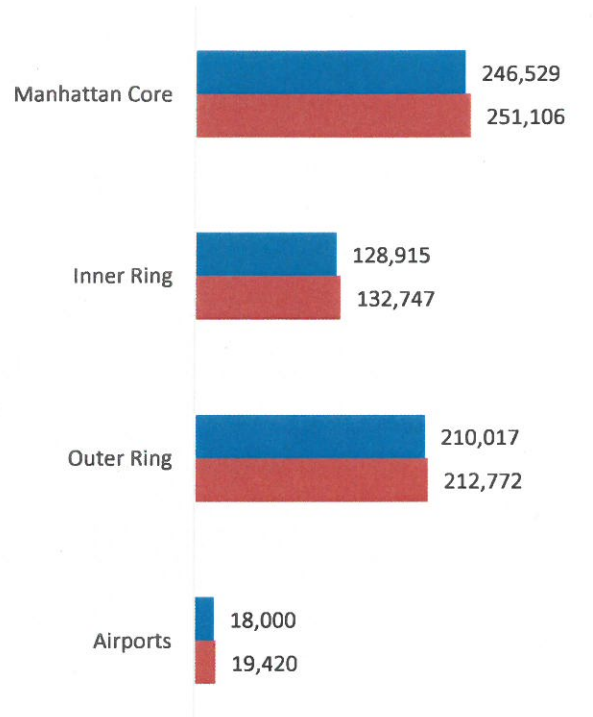
Currently, TLC does not regularly collect wait time data from FHV bases. However, as part of the new FHV accessibility rules as well as the rules creating the new licensing class for High-Volume For-Hire Services (HVFHS) pursuant to Local Law 149 of 2018, TLC will begin collecting this data in January 2019. To establish a baseline for comparison, TLC directed those bases within the new HVFHS category to provide wait time data for the year prior to the moratorium (August 2017 to July 2018). Figure 3 shows the average wait time for trips provided by these services by taxi zone (a geographic unit approximating NYC neighborhoods).

**Figure 2. Average Daily Trips before and after the Moratorium Start Date, By Geography**

Average Daily Trips (All FHVs)

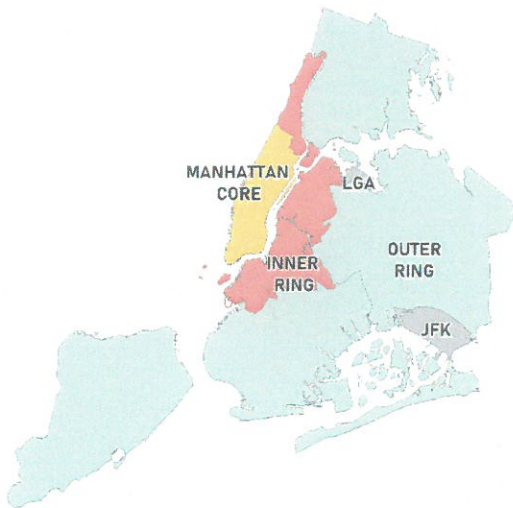


Average Daily Trips (Uber, Lyft, Via, and Juno)

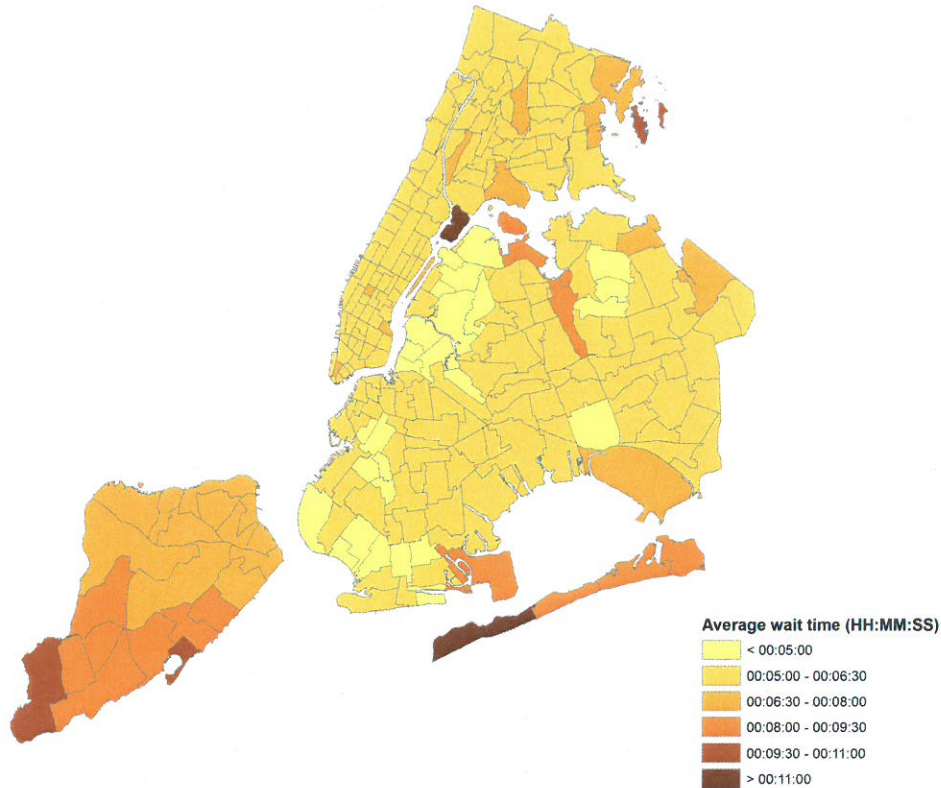


July 1, 2018 to August 13, 2018

August 14, 2018 to September 30, 2018



**Figure 3. Average FHV Wait Times by Taxi Zone, August 2017 to July 2018**



Most of the city experienced very low wait times on average between August 2017 and July 2018, and in nearly all neighborhoods in the Bronx and in parts of Brooklyn and Queens that are farther from Manhattan, the average wait time was under 8 minutes. The longest average wait times experienced were in Breezy Point on the Rockaway Peninsula in Queens (13 minutes) and on Randall's Island in Manhattan (11 minutes). Although we do not have data on wait times during the moratorium so far, we believe that due to the high number of vehicles already in service, the number of applications leading up to the law's enactment, as well as the trends in license renewal rates, the impacts on wait times, if any, would be negligible for the period covered by this report.

#### **Recommendation on the Issuance of Additional Licenses for Special Geographic Areas**

Based on the increased volume of new applications received before the enactment of Local Law 147 and the continued expansion in service provided by FHV's during the moratorium so far, we do not see an impact on ridership and do not recommend the issuance of any licenses for special geographic areas.

Sincerely,

Meera Joshi  
Commissioner