

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

Proposed Rules – Driver Minimum Pay Rule Amendment

### **Public Hearing Comments**

- NYC Rules Public Comments Page 2
- Licensee AW Page 8
- Licensee KD Page 9
- Kathleen Collins Board Memeber of Disabled In Action of Metropolitan New York Page 10
- Andrew Greenblatt Independent Drivers Guild (IDG) Page 17

# **Driver Minimum Pay Rule Amendment**



rules.cityofnewyork.us/rule/driver-minimum-pay-rule-amendment/



Rule status: Proposed

Agency: TLC

Comment by date: September 3, 2025

#### Rule Full Text

TLC-Proposed-Further-Amendment-of-Rules-re-Minimum-Pay-for-High-Volume-For-Hire-Vehicle-Drivers-Certified.pdf

Amendment to the driver minimum pay rules to adjust the minimum per-mile rate for highvolume for-hire vehicle trips that begin in New York City and end outside of New York City.

TLC will hold a public hearing on the proposed rule. The public hearing will take place at 10:00 am on September 3, 2025. The public hearing will be held online using Zoom. There will be no in person public hearing. The public hearing will be livestreamed on TLC's website at www.nyc.gov/tlc. To participate in the public hearing, please e-mail the TLC at [email protected] or call TLC at 212-676-1135 by September 2, 2025. After you have signed up to speak, TLC will provide you with a Zoom URL to enter in on your computer or dial-in via phone number if you prefer to call in.

#### Send comments by

# **Public Hearings**

Attendees who need reasonable accommodation for a disability such as a sign language translation should contact the agency by calling <u>1 (212) 676-1135</u> or emailing [email protected] by **September 2**, **2025** 

# Wednesday Sep 03 - 10:00am EDT

Date

September 3, 2025 10:00am - 12:00pm EDT

**Disability Accommodation** 

- Closed Captioning
- Communication Access Real-Time Translation

#### Comments are now closed.

Online comments: 6

#### Wardak

Drivers are facing serious challenges right now — from high gas prices to increased vehicle maintenance and insurance costs. Instead of truly helping, TLC reduced the mileage rate by 12% (from \$1.41 to \$1.24), while only increasing the per-minute rate by 10%. This is not a 5% overall increase as claimed.

In fact, many drivers are now earning less after August 1. TLC should have applied the 5% increase to both the mileage and minute rates, not cut the most important part of our earnings. We rely heavily on mileage-based pay, especially on longer trips. Cutting that rate puts more financial pressure on hardworking drivers.

We urge TLC to reverse this decision and support drivers with real, meaningful pay increases.

We are extremely disappointed by the recent decision from the TLC. We did not expect this kind of unfair calculation from an agency that oversees more than 200,000 licensed TLC drivers.

Comment added August 5, 2025 2:42am

#### Amin merette

No estoy de acuerdo con esas tarifas de Uber trabajo en el turno de noche y mis ganancias se ven menores y el costo de vida cada dia es más caro. Y Uber gana 50/50. Me explico si me pagan 60 Uber cobra 59.99 para ellos no es justo que como chofer ellos ganen más que yo y más que el cliente tenga que pagar tanto dinero

Comment added August 5, 2025 12:28pm

#### Abu Azou

#### Dear TLC Commissioners,

I am writing as a licensed TLC a dedicated Driver of Wheelchair Accessible Vehicle (WAV) in New York City. I am extremely disappointed by the recent amendment adjusting the minimum per-mile pay rate for high-volume for-hire vehicle (HVFHV) trips that begin in NYC and end NYC and not alone this new proposal for trips that end outside the City. Serious Financial Burdens for Drivers

Drivers today face unprecedented financial challenges with skyrocketing gas prices, sharply rising vehicle maintenance costs, higher insurance premiums, and ongoing TLC compliance expenses. Instead of easing these burdens, TLC has chosen to reduce the mileage rate — a move that directly cuts into the core of our earnings.

While the TLC claims a 5% increase, that is misleading. In reality, the mileage rate was reduced by 12% (from \$1.41 to \$1.24), and only a 4% increase was made to the perminute rate. Since drivers rely heavily on mileage especially on longer trips this change reduces overall income for many of us after August 1st. A true 5% pay increase should have applied to both mileage and minute rates, not favor one at the expense of the other. Out-of-Town Trips: An Unfair Adjustment

The proposed adjustment of the out-of-town minimum per-mile rate to \$1.700 for non-WAVs appears to correct a prior oversight in accounting for utilization rates and vehicle depreciation. While that update is appreciated, it does not go far enough to address the full scope of drivers' concerns, especially for WAV drivers like myself.

WAV Drivers Face Even Greater Challenges

As a WAV driver who invested over \$78,000 in a compliant accessible vehicle, I expected to continue receiving a fair mix of trip types including longer, higher-paying rides. However, since making the switch from a standard sedan (a Honda Accord), I have notably stopped receiving long-distance trips particularly those going outside NYC or from major airports. Especially with uber

This shift in dispatching has made it extremely difficult to earn a sustainable income, despite the higher operating costs and the added responsibilities that WAV drivers take on. Our service is vital for riders with disabilities, and we deserve the same earning opportunities as other drivers if not more.

Uber consistently keeps WAV drivers trapped inside Manhattan. Even when I wait at the airport, the trips I get are almost always just to Manhattan never beyond. If I'm in the Bronx or Brooklyn, Uber sends me right back to Manhattan, where I'm stuck doing only short trips. I never receive trips from outside Manhattan or even from Manhattan to outside the City. The only "longer" rides I occasionally get are from Manhattan to JFK or LaGuardia, but those are rare.

Meanwhile, non-WAV drivers receive more frequent long trips, including out-of-city fares, giving them better chances to earn fairly. This is unacceptable and unfair to WAV drivers who have made major investments and serve riders with accessibility needs.

Our Request to the TLC

We urge the Commission to:

- Reverse the mileage rate cut to before August 1 and apply the full 5% increase fairly across both per-mile and per-minute rates.
- Ensure WAV drivers receive equitable trip assignments, including longer trips and airport fares.
- Provide real and meaningful support for all drivers especially those who invest more to serve the most vulnerable passengers.

We did not expect such an unfair and misleading adjustment from an agency tasked with protecting more than 200,000 hardworking licensed TLC drivers. We call on you to reconsider this rule amendment and stand with the drivers who keep New York City moving with professionalism, accessibility, and care.

Sincerely,

Comment added August 6, 2025 5:49pm

#### Mustapha Ouhejjou

Hi we deserve a raise and faire pay as we're a backbone of these companies that take all the payments and left us with almost nothing especially out of town trips. We are the ones who risking our lives behind the wheels plus too much expenses to deal with Best regards and thank you

Comment added August 7, 2025 5:26am

#### KHANDAKER AHMED

Please increase the payment because it's very much necessary for us Black suv drivers to survive. I drive for uber and lyft since 2014 and i feel like we are still stuck at the 10 year back price list, there were barely any increase but car payment interest and insurence going up every year.

Comment added August 12, 2025 8:15pm

#### **Kathleen Collins**

In the annexed letter please see my comments in response to the New York City Taxi and Limousine Commission's request for comments regarding the TLC's proposal to amend its rules with respect to the following four topics:

- 1-Wheelchair Accessible Vehicle Conversion, Reference Number 2025 RG 005,
- 2-Cyclist Awareness Decals, Reference Number 2025 RG 058,
- 3-Personal Injury Insurance Coverage Requirement, Reference Number 2025 RG 057, and,
- 4-Driver Pay Rule Amendment, Reference Number 2025 RG 062.

Very truly yours, Kathleen M. Collins

#### Comment attachment

9-2-2025-Final-Letter-to-NYC-TLC-Conversion-of-Taxis-Etc-2.pdf

Comment added September 2, 2025 5:55pm

From: Arya wu
To: tlcrules (TLC)

Subject: [EXTERNAL] on Uber's Recent Fare Structure Change – Unfair and Harmful to Drivers

**Date:** Monday, August 4, 2025 4:16:48 PM

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To the New York City Taxi and Limousine Commissioner

I am a TLC-licensed driver working full-time with Uber in New York City. I am writing to express my strong opposition to Uber's recent fare structure adjustment, which the company falsely promoted as a "pay raise" for drivers.

In reality, Uber has significantly reduced the per-mile rate (base fare for distance), while slightly increasing the per-minute rate (time-based fare). This change disproportionately harms drivers. Even though time-based pay has increased, the overall earnings per trip have decreased, especially on longer or more efficient trips. For drivers, this means more time on the road, more wear and tear, more fuel usage—and less income.

Uber has essentially cut driver pay under the misleading name of a raise. This is not only disingenuous, but it also reflects the ongoing pattern of large app-based companies taking advantage of drivers, who already have little to no say in how these platforms operate.

I strongly urge the TLC to take regulatory action to:

- Investigate the real impact of Uber's fare adjustments on driver earnings;
- Require app-based platforms to get approval before changing driver pay structures;
- Enforce a minimum earnings standard per mile and per minute to prevent exploitation;
- Establish greater transparency and accountability in fare calculations.

We drivers are already facing inflation, rising fuel prices, vehicle maintenance costs, and long working hours. These so-called "adjustments" push many of us closer to financial instability, all while Uber continues to profit.

Please do not allow companies like Uber to keep exploiting drivers under the false pretense of wage increases. We ask TLC to stand with drivers and protect our livelihoods.

发自我的 iPhone

 From:
 khairul dipu

 To:
 tlcrules (TLC)

**Subject:** [EXTERNAL] testimony

**Date:** Tuesday, August 5, 2025 12:45:48 PM

[You don't often get email from khairuldipu17@gmail.com. Learn why this is important at <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a>]

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#### Hello sir/ madam,

I'm a for hire vehicle driver and they change you guys made with lower mileage it's really hurting me and my income. I hope you guys come up with better mileage prices and higher minutes price. It's hurting my all over the income and giving me hurt time to get up with all this expensive things in NYC. Mantaintace is too high for all car and price is high too. Rent high it's really hurting all over my income. Please come up with better price and better opportunities for drivers. Thank you.

Sent from my iPhone

# Kathleen M. Collins Email address: kclawprof1@gmail.com

Cell Phone No.: 917-576-0225

# September 2, 2025

Commissioner David Do New York City Taxi Limousine Commission Attention: Office of Legal Affairs 33 Beaver Street, 22nd Floor New York, New York 10004

Email address: <u>tlcrules@tlc.nyc.gov</u>

Filed at: <a href="https://rules.cityofnewyork.us/">https://rules.cityofnewyork.us/</a>

Re: New York City Taxi And Limousine Commission's ("TLC") Proposal To Amend The Following TLC Rules –

- 1- Wheelchair Accessible Vehicle Conversion, Reference Number 2025 RG 005,
- 2-Cyclist Awareness Decals, Reference Number 2025 RG 058,
- 3-Personal Injury Insurance Coverage Requirement, Reference Number 2025 RG 057, and,
- 4-Driver Pay Rule Amendment, Reference Number 2025 RG 062.

#### Dear Commissioner Do:

My name is Kathleen Collins. I am a native New Yorker who is a congenital quadruple amputee who uses a wheelchair and has lived in New York City for more than 60 years. I am on the Board of Disabled In Action of Metropolitan New York, also known as DIA, and a Co-Coordinator for Downstate New York ADAPT, two grassroots disability organizations that advocate for the civil rights of all people with disabilities.

I submit these comments in response to the New York City Taxi and Limousine Commission's request for comments regarding the TLC's proposal to amend its rules with respect to the following four topics:

- 1-Wheelchair Accessible Vehicle Conversion, Reference Number 2025 RG 005,
- 2-Cyclist Awareness Decals, Reference Number 2025 RG 058,
- 3-Personal Injury Insurance Coverage Requirement, Reference Number 2025 RG 057, and,
- 4-Driver Pay Rule Amendment, Reference Number 2025 RG 062.

# 1-Wheelchair Accessible Vehicle Conversion, Reference Number 2025 RG 005

It has always been and continues to be the position of the disability community that all taxis should be wheelchair accessible and that every taxi manufactured for service in New York City should be a wheelchair accessible vehicle. We understand that this is not something that can be done overnight, however, if you don't put a plan into place, it will never be done. Thus, this rule should have some type of requirement that within a certain number of years, such as 3 to 5 years from now, all taxis that are going to be operated in New York, must be manufactured to be wheelchair accessible, like they are in cities such as London, England.

Since we have no such regulations yet, it would seem that allowing more companies to do the retrofitting of taxis to make them wheelchair accessible would increase competition and thereby lower costs of such retrofits. However, we are concerned that the proposed rule amendment does not seem to address what we may be sacrificing by opening such retrofitting to greater competition, such as the safety and comfort of passengers using wheelchairs.

Specifically, the proposal does not address the possibility that quality and safety will be sacrificed if the conversion of taxis to wheelchair accessible vehicles is open to greater competition without proper oversight by the TLC. Thus, we would like to see this proposal to include language that would safeguard against a reduction in quality and safety.

Further, this proposed rule needs to include a requirement that all retrofitted taxis have an all-in-one seat belt and shoulder belt that hangs from the ceiling and hooks into the floor in one smooth movement since this would increase the possibility of a person using a wheelchair receiving a shoulder belt and seat belt, which sadly is not the case presently.

Finally, we would like to see that the Waymo pilot project, just recently approved by the TLC, takes into consideration and studies the ability of these vehicles to recognize wheelchairs, scooters and people with disabilities as well as people who are older. Further, the TLC should promulgate regulations that in the future all electric taxis and for-hire vehicles that roll off a manufacturer's production line be wheelchair accessible and nothing else.

# 2-Cyclist Awareness Decals, Reference Number 2025 RG 058

With respect to the cyclist awareness decals proposed rule, we agree with the Center for Independence of the Disabled, New York's comment that cyclist awareness decals need to be provided in a format that provides effective accessible communication. More specifically, these decals need to be printed in a large font and have high contrast as well as provide an audio announcement before a passenger disembarks from the vehicle since the person may not be able to read even an accessible decal.

# 3-Personal Injury Insurance Coverage Requirement, Reference Number 2025 RG 057

I oppose the TLC's proposal to reduce the personal injury insurance coverage that TLC - license vehicles must get to operate a TLC licensed vehicle in New York City. Contrary to the TLC's statement that decreasing the amount of coverage needed from \$200,000 to 100,000 "will better ensure that all road users - drivers, passengers, pedestrians, and cyclists - are quickly and adequately compensated in the event of an injury-causing crash, especially when injuries are significant or involve claims by multiple people" the facts show otherwise.

It seems that the only reason TLC would propose a rule that decreased the amount of insurance coverage a driver or company had to have is to decrease the premiums drivers and companies must pay for insurance and thus, at first blush, it would appear to be a good rule for the drivers and companies. After further consideration, however, we are concerned that the consequences of this proposed regulation would be to increase, not decrease, the exposure of drivers, companies, and passengers alike due to the possibility of more higher costs lawsuits and, in turn, an increase in the time necessary to resolve claims when a passenger sustains personal injuries. With less insurance coverage available to passengers to seek compensation for their injuries and economic losses incurred, injured passengers

will be forced to hire an attorney to recover adequate compensation, and more drivers will be forced to hire attorneys to defend them against these lawsuits. Thus, this proposed amendment does not help anyone and harms everyone.

If the true motivation for the proposed reduction in insurance coverage is related to concerns by the TLC about insurance premiums for drivers or companies, a factor not explicitly stated in the TLC's rationale, the TLC should consider other solutions that do not jeopardize public safety and the ability of a passenger injured in an accident to properly receive compensation in a timely manner. I agree with the alternatives suggested by John Doe, that is, the TLC could investigate the insurance premium structures taking into consideration dynamics within the industry and identify ways to support drivers and companies without jeopardizing coverage for injured passengers, 2-the TLC could advocate for statewide reforms or subsidies that balance affordability for drivers with robust consumer protection ensuring that all are protected, and 3-the TLC could implement safety measures such as enhanced driver training programs, stricter enforcement of traffic rules, and safer manufactured vehicles.

As stated by many other commenters, medical costs are increasing, not decreasing, thus, it makes no sense to reduce the current required insurance coverage for personal injury protection. If anything, the amount of required insurance coverage should be increased since medical costs are only increasing.

It is unfathomable why the New York City Council buckled to pressure from companies such as Uber and Lyft and has totally disregarded the safety of passengers and the increasing need for drivers to be insured against major personal injury and economic damages claims. This change does not address the real issues, such as high premiums and claims of purported fraud. These issues need to be addressed head-on, not by lowering insurance coverage.

It is time that the New York City Council and TLC work with drivers, passengers, and insurers to create better insurance choices, such as some type of pooled or self-insurance that New York State and New York City can help to create and administer. Please do not enact this proposed amendment to the TLC rules.

# 4-Driver Pay Rule Amendment, Reference Number 2025 RG 062.

We strongly support the right of drivers to earn a fair, living wage and, to the extent that the proposed amendment to the rules accomplishes this, we support this proposed amendment to the rules.

Thank you for the opportunity to submit this testimony.

Very truly yours,

Kathleen M. Collins

# Written Testimony of Andrew Greenblatt, Policy Director Independent Drivers Guild (IDG) Submitted to the New York City Taxi and Limousine Commission September 3, 2025

Greetings, Commissioner Do, and members of the Taxi and Limousine Commission. My name is Andrew Greenblatt, and I am the Policy Director of the Independent Drivers Guild (IDG). Thank you for the opportunity to submit this testimony on three important issues being considered by the Commission.

The Independent Drivers Guild is a nonprofit affiliate of the International Association of Machinists and Aerospace Workers (IAMAW). Our organization represents more than 140,000 for-hire vehicle (FHV) drivers in New York State and 300,000 across the country.

#### **Out-of-Town Per-Mile Rate**

The IDG understands that the Commission is amending the per-mile rate for out-of-town trips due to an error during the last rule change. We acknowledge, without expressing support or opposition, the TLC's effort to correct the previous error concerning the per-mile rates across all trips.

We must point out, however, that the current per-mile rates across the board still do not cover the expenses for the large portion of the drivers who are forced to lease or rent their vehicles due to the current TLC policy of restricting plates.

We have addressed this issue in the past. To ensure all drivers can earn a living wage and keep their costs down, we once again urge the TLC to release FHV plates to existing drivers who wish to own their own vehicles. This change would reduce their operating costs and allow them to earn a living wage. If the Commission continues to enforce this unfair rule, we urge you to raise the per-mile rate to a level that covers the additional expenses your policy is imposing on these drivers.

### Personal Injury Protection (PIP) Insurance

The IDG fully supported the passage of **Introductory Number 1050**, which lowered the minimum PIP insurance coverage required for FHV drivers. We thank Council Member De La Rosa for her effective advocacy on this issue. We also support the TLC's proposed rule changes to bring its regulations into compliance with the new law.

However, we believe this is only a partial victory. We continue to advocate for the complete abolition of the city and state's PIP insurance requirements for FHV drivers. Drivers should not be held responsible for accidents they did not cause and could not prevent. This policy change moves us one step closer to that goal.

### **Passenger Safety Decals for Bicyclists**

For years, the IDG has distributed free decals to drivers that remind passengers to check for oncoming bicyclists before opening their doors. We are encouraged that the Commission is considering a rule to require such decals. This is a common-sense measure that will help keep passengers and bicyclists safe.

While we support the requirement, we urge the Commission to focus on distribution over punishment. We ask that the TLC distribute these decals to drivers rather than penalizing them with fines for a first offense. TLC enforcement officers can do this, as can inspectors during FHV inspections. Drivers want to protect their passengers and others on the road, and this cooperative approach would help them do just that.

Furthermore, preventing driverless cars from roaming our streets is the most impactful way that the city can protect cyclists, rideshare passengers, and pedestrians right now. Federal regulators have yet to approve standardized safety tests to ensure driverless vehicles detect and avoid cyclists and pedestrians. Until safety is assured, driverless cars should not be permitted on New York streets.

#### Conclusion

We thank the Commission for its attention to these matters and look forward to working with you to create fair and safe policies for all FHV drivers and the riding public.