

New York City Taxi & Limousine Commission

Proposed Rules – Personal Injury Insurance Coverage

Public Hearing Comments

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Personal Injury Insurance Coverage

 rules.cityofnewyork.us/rule/personal-injury-insurance-coverage/



Rule status: Proposed

Agency: TLC

Comment by date: September 3, 2025

[Rule Full Text](#)

TLC-Proposed-Amendment-of-Rules-Relating-to-Insurance-Coverage-for-Licensed-Vehicles-Certified.pdf

Implementation of Local Law 90 of 2025 to reduce personal injury insurance coverage for TLC-licensed vehicles to amounts not exceeding 200% of the state-level minimum requirement.

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 [1\(212\)676-1135](tel:1(212)676-1135) 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: 5

Anita Dickson

In the “Statement of Basis and Purpose” the author of this proposal has the audacity to write:

“[Cutting the minimum required insurance coverage in half] will better ensure that all road users ... are quickly and adequately compensated in the event of an injury-causing crash...”

I just am in awe of how unabashedly a proposal, that clearly only benefits a small group of people at the expense of everyone else, is spun as something that will actually somehow help the exact people it will directly harm!

How would cutting the required insurance coverage lead to quicker adequate compensation? The exact opposite is true; the coverage will be less adequate and the compensation time will be much longer since a higher number of people will need to get lawyers involved.

This is a terrible proposal for several reasons:

Easing insurance requirements on TLC-licensed vehicles will lower the cost of owning and operating these vehicles, as if the current insurance costs are an undue financial burden that is preventing enough vehicles from being on the road to meet the public’s demand — in reality there is no such shortage. In fact there are, if anything, too many vehicles already in operation (even still TLC licenses are highly coveted and in demand); this is because owning and operating these vehicles is a profitable endeavor already. TLC licensed vehicles should undoubtedly carry more insurance than personal vehicles by the very nature of how and why they are operated; this was the reasoning behind creating the rule originally and I don’t see why this should change.

Anyone in favor of this proposal is clearly taking the side of wealthy TLC-license holding groups over the best interests of their constituents; voting in favor of this proposal is like waving a flag that you have been bought and paid for; you are willing to trade the best interests of the public in exchange for support from a lobbying group.

Comment added August 2, 2025 7:25pm

John Doe

This is an absolutely terrible proposal that in absolutely no way benefits the public. See the attached report on why this change MUST not be adopted.

[Comment attachment](#)

Insurance-Coverage-Reduction-Opposition.pdf

Comment added August 2, 2025 7:30pm

John Doe

Please vote against this proposal! It absolutely goes against the public's best interests. Please read the attached report as all of the information could not fit into the comment section online.

(To moderator: I am resubmitting this as the attached file was originally incorrectly formatted, you can ignore my previous comment several minutes ago)

[Comment attachment](#)

Insurance-Coverage-Reduction-Opposition-.pdf

Comment added August 2, 2025 7:39pm

[\[email protected\]](#)

The New York City Taxi and Limousine Commission's (TLC) proposal to reduce personal injury insurance coverage for TLC-licensed vehicles from \$200,000 to \$100,000 per person is fundamentally flawed and detrimental to public safety and victim compensation.

Insufficient Coverage: The proposed \$100,000 limit is demonstrably inadequate to cover the actual costs of severe and catastrophic injuries in New York City. Medical expenses for conditions like spinal cord injuries or traumatic brain injuries can range from hundreds of thousands to over a million dollars, far exceeding the proposed coverage. Actual personal injury settlements in New York frequently surpass this amount, indicating the true financial need for comprehensive compensation.

Increased Financial Burden on Victims: Reducing the immediate no-fault benefit will force severely injured individuals to rely more heavily on their personal health insurance (which comes with deductibles and co-pays) and, more significantly, compel them into lengthy and costly personal injury lawsuits to seek full compensation, including non-economic damages like pain and suffering. This directly contradicts the TLC's stated goal of "quick and adequate compensation".

Heightened Risks in NYC's Urban Environment: New York City's high population density, complex intersections, diverse transportation methods (including a high volume of pedestrians and cyclists), and ongoing construction contribute to a high incidence of traffic accidents, many involving TLC-licensed vehicles and resulting in severe injuries. Data shows thousands of crashes involving TLC vehicles annually, with hundreds leading to severe injuries. This high-risk environment necessitates robust insurance coverage, not a reduction.

Contradiction of TLC's Historical Rationale: The TLC initially adopted the \$200,000 coverage in the late 1990s as part of a "broader effort to address safety in the for-hire industry," recognizing that TLC vehicles are primarily used full-time for hire. The proposed reduction abandons this safety-driven precedent without any change in the underlying conditions that justified it.

In conclusion, the proposed reduction would leave accident victims inadequately protected, increase their financial and emotional burden, and undermine the TLC's historical commitment to public safety in a high-risk urban setting.

Comment added August 2, 2025 7:45pm

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-1.pdf

Comment added September 2, 2025 5:53pm

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: tlcrules@tlc.nyc.gov
Filed at: <https://rules.cityofnewyork.us/>

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

BEFORE THE NEW YORK CITY TAXI AND LIMOUSINE COMMISSION

**Request for comment: Personal Injury
Insurance Coverage Requirements**

Public Hearing: September 3, 2025

COMMENTS OF

UBER USA, LLC AND ITS AFFILIATES

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Attorney for Uber USA, LLC

Uber¹ submits these comments to the New York City Taxi and Limousine Commission (“TLC” or the “Commission”) in connection with the revisions to the Personal Injury Insurance Coverage Requirements (“PIP Requirements”) proposed by the Commission (the “Proposed Rule”).

Uber proudly supported the passage of Local Law 90 of 2025, and is encouraged to see the Commission’s implementation. By reducing PIP Requirements from \$200,000 to \$100,000, the City and TLC have recognized the disproportionate cost burden that high insurance premiums impose on the City’s for-hire drivers. The Proposed Rule will immediately alleviate some of those pressures and bring real, tangible savings to thousands of hardworking drivers, allowing them to retain more of their earnings and increase economic stability across the industry. Moreover, Uber believes this reduction may help decrease fraud and increase competition in the insurance space as high PIP requirements have been cited as the reason some insurers avoid the industry.²

Still, it is important to note that \$100,000 is twice the state-established minimum, and the maximum allowable requirement under Local Law 90. While this reduction represents meaningful progress, Uber encourages the Commission to consider additional amendments aimed at reducing driver expenses and a proactive review of the impact the reduced PIP Requirements have, including the effect on claim frequency, payout adequacy, and driver expenses. This data-driven analysis can then be used to determine the value of future rule improvements.

¹ “Uber” herein refers to Uber USA, LLC (HV0003) (B03404), and its affiliates.

² See Mark Browne, *THE RELATIVE COST OF RIDESHARE INSURANCE IN NEW YORK (2025)*, <https://acrobat.adobe.com/id/urn:aaid:sc:US:3e5e9452-aedd-4390-8920-41ef945b9c5b> (last visited Sept. 2, 2025).



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TESTIMONY OF PETER M. MAZER

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METROPOLITAN TAXICAB BOARD OF TRADE

TLC Public Hearing: PIP Limits

September 3, 2025

Good morning, Chairperson Do and Members of the Commission. My name is Peter Mazer, General Counsel to the Metropolitan Taxicab Board of Trade (MTBOT), a seventy-two year old association representing owners and operators of licensed medallion taxicabs. Since 1998, the TLC has required taxicab and FHV owners to maintain limits of no-fault insurance well in excess of the limits required for other vehicles, including other commercial vehicles. Today, the Commission is considering a rule which would reduce the minimum levels of Personal Injury Protection (“PIP” or “no-fault”) insurance from the current \$200,000 per person requirement to \$100,000. We urge the TLC to further reduce the minimum amount of mandatory coverage to \$50,000, the required limit set by New York State law and applicable to virtually all motorists.

Earlier this year, the City Council considered a bill which would have prohibited the TLC from requiring a vehicle owner to maintain levels of no-fault insurance that exceeded the state mandated levels, \$50,000 per person. Insurance carriers as well as vehicle owners and operators testified that higher mandated levels of insurance encouraged claimants to file fraudulent and excessive claims, allowed medical providers to bill for unnecessary procedures and services, and enabled unethical attorneys to support frivolous lawsuits. In fact, given these higher levels of insurance coverage that yellow taxis and other TLC-licensed vehicles have, they have become

easy targets for these fraud. Combined, these impose a burden on the industry without providing any discernible benefit to the public. In the end, the City Council bill that was signed into law by the Mayor that permitted the TLC to set a limit for minimum no-fault coverage at an amount no more than 200 percent of the state minimums. Accordingly, limits could be set at no more than \$100,000 per person. However, the bill does not require the TLC to adopt these higher limits; the TLC could by rule set limits as low as \$50,000, the state requirement.

We urge the Commission to amend the proposed rule to further reduce the minimum level of no-fault insurance to \$50,000, the state-mandated amount. Reducing the mandatory no-fault limits to the required state levels would go a long way toward reducing fraud, making it less lucrative for medical providers and attorneys to encourage claimants to seek unnecessary treatment, while still preserving all rights that person seriously injured to receive appropriate and adequate compensation. Lowering the costs of no-fault claims could ultimately protect the solvency of the fragile taxicab and livery insurance industries and possibly provide savings to owners who are already bearing the costs of new car purchases, insurance that in many cases exceeds \$10,000 per year, as well as other operating expenses, and encourage the recovery of our industries. Indeed, nothing in either the testimony before the City Council, or the Statement of Basis and Purpose in today's rulemaking, provides any evidence that there is a public benefit in setting no-fault limits at \$100,000, rather than the state \$50,000 requirement.

Thank you for giving me the opportunity to speak today. I would be happy to answer any questions you may have.

**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.