

Testimony of Carlos A. Ortiz
New York City Department of Consumer and Worker Protection

Before the Committee on Consumer and Worker Protection
Hearing on Introduction 518

April 9, 2026

Introduction

Good morning, Chair Epstein, and members of the Committee on Consumer and Worker Protection. My name is Carlos Ortiz, and I am Chief of Staff and Deputy Commissioner of External Affairs at the Department of Consumer and Worker Protection. I am joined by our General Counsel, Michael Tiger, and Director of Litigation in our Office of Labor and Policy Standards, Emily Hoffman. Thank you for the opportunity to testify before the Committee today on Introduction 518.

Protecting New Yorkers

The NYC Department of Consumer and Worker Protection (DCWP) is the nation's leading municipal enforcement agency charged with delivering economic justice. DCWP leverages its authority to bring New Yorkers real economic relief and protect them from predatory, deceptive, and unfair practices that violate their rights as consumers and workers. This includes pioneering cutting-edge protections, such as the City's Consumer Protection Law, Protected Time Off Law, Fair Workweek Law, and Delivery Worker Laws, including the Minimum Pay Rate for delivery workers. Through licensing more than 45,000 businesses in over 45 industries, DCWP ensures fair competition and a level playing field for responsible small businesses that are integral to New York City's vibrant communities. DCWP also provides essential services such as free tax preparation and financial counseling to ensure New Yorkers keep more of what they earn and can plan for their futures. DCWP is committed to making sure New York City is a fairer, more affordable place to live.

Championing Economic Justice

Under Mayor Mamdani and Commissioner Levine, DCWP has built upon our historic track of success to go even further, and take on the challenge of delivering economic justice to New Yorkers. From expanding the minimum pay rate to grocery delivery workers, to litigating against predatory corporate entities, to adopting new protections against junk fees and other consumer traps, our fight on behalf of New Yorkers' economic lives has been relentless. Last year, we delivered a record-breaking \$44.4 million in restitution to more than 24,000 workers through our enforcement of cornerstone New York City workplace laws, such as the Fair Workweek Law, Protected Time Off, Delivery Worker Laws, and more. So far in 2026, we have already secured more than \$9.3 million for New Yorkers in restitution. That represents nearly \$100,000 back to New Yorkers per day since the start of the Administration. This is real economic relief for New Yorkers at a time when affordability is a central issue in all of our lives. And, we take our crucial role of delivering economic justice with great pride and responsibility. To corporations or companies that shirk their legal obligations to exploit New Yorkers, our message is clear – you will be held accountable. As the Mamdani Administration moves forward with an ambitious vision for economic justice, we will continue to implement and enforce vital protections for New Yorkers.

Introduction 518

Turning to today's legislation, Introduction 518 requires operators of certain warehouses and storage facilities from which goods are delivered to consumers in the city to obtain a business license from DCWP. This bill also

provides for worker remedies when companies do not comply, through administrative enforcement and a private right of action.

DCWP supports Introduction 518. In the last decade, last-mile facility jobs have grown significantly in New York City, and companies in this space are benefiting from record profits. However, protections for workers at last-mile facilities have lagged behind other cutting-edge worker protections establishing fairness and stability. Last-mile facilities frequently subcontract much of their core delivery work instead of hiring their own employees to do the work. This model externalizes costs, as well as liabilities, which can lead to labor violations and the exploitation of workers in unsafe working environments. In other industries, we have seen how the subcontracting model shields the “parent company” from liability. In those spaces, DCWP has supported efforts to eliminate subcontracting, such as through the Safe Hotels Act. Even though last-mile facilities subcontract work, they still maintain significant control of workers’ schedules, workflow and lives, often times pressuring workers to reach unreasonable quotas without taking responsibility for any subsequent issues that arise. The “parent companies” are therefore the root problem and must be held accountable for any exploitation of workers or violations of the law. While we have concerns with certain provisions of the bill, ultimately, we believe this bill will empower the agency to address these core economic justice issues on behalf of thousands of workers. We look forward to working with the Council for passage of this legislation.

Conclusion

Thank you for the opportunity to testify before the committee on today’s legislation. As always, we are eager to partner with the Council on legislation to improve protections for workers, and prioritize economic justice in our city. I welcome any questions you may have for further discussion.



CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
MARK LEVINE
BUREAU OF LABOR LAW

**Testimony of the Office of the New York City Comptroller
Committee on Consumer and Worker Protection
April 9th, 2026**

Good morning, my name is Matan Diner, and I serve as the Policy and Research Analyst for Workers' Rights in the Office of New York City Comptroller Mark Levine, in the Bureau of Labor Law. Thank you to the Committee on Consumer and Worker Protection, Committee Chair Harvey Epstein, and Council Member Tiffany Cabán for the opportunity to testify today. Introduction 518, the "Delivery Protection Act," is an important piece of legislation that will usher in a sustainable system of package deliveries, ensure street safety, and protect the well-being of workers within New York's last mile delivery system.

The recent exponential growth in e-commerce local deliveries, which has expanded from 1.1 million daily deliveries in New York City in 2017 to 2.5 million in 2024, has led to the proliferation of last mile facilities, which are located much closer to residential communities than warehouses historically have been. Since 2017, 18 new last mile facilities have opened, with 11 of them opening since 2020, bringing the total number of last mile facilities to 50.¹

To examine the impacts of this expansion, last November, our Office released a report on the industry, *Fast Shipping. Slow Justice: Traffic, Worker, and Climate Hazards in Last Mile Delivery*. Among other issues, the report detailed troubling trends in traffic and worker safety in this industry.²

The report found that traffic crashes and injuries have increased in areas near last mile facilities. Between 2017 and 2022, after new last mile warehouse facilities opened, 78% of nearby areas saw more injury-causing crashes, with injuries within a half-mile radius rising by an average of 16%. In addition, truck-related crashes increased by 146%, and truck-injury crashes rose by 137%. Traffic safety data also reveals that hot spots for crashes include Maspeth, where crashes near two major FedEx and Amazon warehouses rose by 53% and 48%, respectively, and East New York, where a cluster of four facilities also saw a sharp increase in crashes within a half-mile radius.

The report also found a high frequency of workplace injuries among last mile facility employees, including both warehouse and delivery workers. Between 2022 and 2024, 38 of the 50 last mile facilities (76%) reported injuries to the Occupational Safety and Health Administration (OSHA), totaling over 2,000 injuries, or an average of 678 per year. Within this time frame, the injury rate per 100 employees among last mile workers in New York City was more than triple the national average for all private employers, 8.3 vs. 2.4, respectively. Among these injuries, the **vast majority were severe injuries**, resulting in days away, restrictions, or transfers (DART), as 85% of reported

¹ Facilities identified by the New York City Department of City Planning as "Last Mile."

² Bharadwaj, S. & Diner, M. (2025) *Fast Shipping. Slow Justice: Traffic, Worker, and Climate Hazards in Last Mile Delivery*. Office of the New York City Comptroller. <https://comptroller.nyc.gov/reports/fast-shipping-slow-justice-traffic-worker-and-climate-hazards-in-last-mile-delivery/#acknowledgements>

injuries were DART cases, with a median of 60 days away for 2023 and 69 days in 2024. Furthermore, with this same period of 2020 and 2024, the rate of DART injuries per 100 workers was 7.2, which was **nearly five times higher** than the national average for private sector workers of 1.5.

In addition to looking at workers employed by last mile facilities, the report looked at injury rates among Amazon's Delivery Service Partner (DSP) program, comprised of dozens of subcontracted firms, that exclusively deliver packages on behalf of Amazon. The report found that in 2023 and 2024, known DSPs had an injury rate per 100 employees of 9.2 and a DART rate of 8.1, exceeding those of the larger last mile and courier industries.³

Given these hazards, the Delivery Protection Act provides a needed intervention that will establish meaningful and overdue regulations that ensure this vital industry can grow without putting those working and travelling on our streets in jeopardy. Of key importance is the bill's direct employment requirement, which will hold the entities that set the terms of employment liable for incidents, incentivizing them to ensure the safest routes and practices. Currently, most workers are under independent contractor or subcontractor agreements. These agreements limit direct liability for operators such as Amazon, despite the fact that operators dictate virtually all aspects of a contracted driver's operation, including quotas and routes. This proposed direct employment requirement would alleviate this problematic dynamic.

In addition, the safety training the workers receive under this bill will help to ensure that all delivery workers can safely drive and make frequent stops in dense urban areas with shared roads; that they learn best ergonomic practices when sorting and lifting packages; and how to identify potential injuries and illnesses, such as muscle strains or heat stress, which will become even more hazardous as the severity and frequency of extreme heat increases.

Furthermore, the bill's strong anti-retaliation requirements, including the provision that workers who are fired be provided with a stated reason and the added financial penalties for committing retaliation, will help to protect workers who speak up about safety issues in the workplace.

Lastly, the bill ensures safety by giving the Department of Consumer and Worker Protection (DCWP) the ability to deny, revoke, or suspend a license if an operator has a recent history of violations, including those that relate to traffic and worker safety. This authority provided to DCWP will also begin to address another core externality of last mile delivery, which is analyzed in our report: the environmental impact, as "environmental protection" is one of the listed categories of violations.

This bill is an important step in the right direction to rein in the climate impacts and air pollution experienced by residents of last mile neighborhoods like East New York, Hunts Point, and Maspeth. City Hall should consider regulating indirect sources of pollution, scaling up existing climate-friendly freight management programs pursued by the City, and placing limits on building new facilities in neighborhoods where they are currently concentrated.

If deemed necessary by key stakeholders, including worker representatives, last mile operators, and DCWP, the Comptroller supports potential mutually agreed-upon amendments to the language on license revocation and suspension that prevent the unnecessary loss of work.

³ Due to a lack of transparency around the company's use of DSPs, this report was only able to examine entities that could be fully verified as DSPs.



OFFICE OF THE BROOKLYN BOROUGH PRESIDENT

ANTONIO REYNOSO

Brooklyn Borough President

City Council Committee on Consumer and Worker Protection Hearing on the Delivery Protection Act (Intro 518) April 9, 2026

Good morning, Chair Epstein and members of the committee and thank you for holding this hearing today. I am representing Brooklyn Borough President Antonio Reynoso, who is working alongside advocates and labor partners to call for regulation of last-mile facilities.

As a co-sponsor of both the Indirect Source Rule and the Last-Mile Zoning Text Amendment, the Borough President's advocacy has previously focused on the significant environmental and quality-of-life impacts these facilities have on the borough's environmental justice communities. Diesel-powered delivery trucks emit higher levels of toxic pollutants than gasoline-powered trucks, and recent studies have shown that these facilities are bringing hundreds of trucks per hour to communities such as Red Hook, home to the largest public housing development in Brooklyn. A report from the Comptroller late last year also found that traffic crashes and injuries, especially truck-related, have increased dramatically near new last-mile warehouses. What's more, these facilities take up sought-after space in our city's shrinking manufacturing zones, pushing out the industrial businesses on which our city relies.

But this fight has never been just about the environment, safe streets, or even space. Regulating last-mile facilities is also about the workers. The Comptroller's Employer Violations Dashboard identifies Amazon as the company with the highest number of open Unfair Labor Practice violations in New York City. The US Attorney for the Southern District of New York is investigating workplace safety issues at Amazon's warehouses. And surely you will hear countless stories today of worker mistreatment in the last-mile industry. Intro 518 aims to address such issues by creating a licensing structure that gives the City oversight on safety, training, and employment practices to protect workers.

This is not the first time that a coalition of advocates and labor has taken on a dangerous industry to improve both environmental and working conditions. Many of the same organizations and unions in this room took on the corrupt and exploitative commercial waste industry and created an oversight regime called commercial waste zones in 2019. While the program is still being implemented, the initial rollout has led to improved conditions for private sanitation workers, more agency enforcement against unsafe driving practices, and a reduction in vehicle miles traveled in the implemented zones. Importantly, the sky hasn't fallen. It is possible to regulate an

industry, protect workers, and protect the environment, while allowing the industry to continue serving its customers.

Thank you again for holding this hearing today. Borough President Reynoso thanks the administration for its support of this important legislation, as well as for the Indirect Source Rule and the Last-Mile Zoning Text Amendment, and will continue to partner on implementing these important policies.



JUMAANE D. WILLIAMS

**TESTIMONY OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS TO THE NEW YORK CITY COUNCIL COMMITTEE ON CONSUMER & WORKER PROTECTION
APRIL 9, 2026**

My name is Jumaane D. Williams, and I am the Public Advocate for the City of New York. I want to thank Chair Epstein and the members of the Committee on Consumer and Worker Protection for holding this important hearing. I particularly want to thank Council Member Cabán for your tireless work on the Delivery Protection Act, as well as Council Member Aviles, who I've worked with regarding last mile facilities in Red Hook and Sunset Park.

The massive growth of home delivery operations since 2020 has led operators like Amazon, FedEx, and UPS to become major employers in our city. However, these companies use legal loopholes to dodge labor standards, ignore safety violations, and crush organizing efforts. This isn't innovation, it's exploitation dressed up in corporate spin. I welcome job growth, but we must ensure every job provides dignity, fair compensation, and collective bargaining opportunities. And the last mile facilities that anchor these jobs must benefit nearby communities, not hurt them.

Warehouse workers and delivery drivers are not just points along a supply chain, these New Yorkers are vital pillars of their communities. The parent who works long shifts in a warehouse to keep their kids clothed and fed should not have to worry that their job is more likely to result in severe workplace injuries than others. The young adult who drives a delivery truck to supplement their parents' medical costs should not feel so rushed that they are unable to take breaks. Elders crossing the street near last mile facilities shouldn't have to worry about documented increases in vehicle crashes and major traffic injuries. But the data undeniably demonstrates that last mile delivery facilities are correlated with more and more dangerous traffic accidents, worse air quality and other environmental justice issues, and unacceptably high rates of severe worker injuries.¹

Intro. 518, the Delivery Protection Act, makes two changes that will vastly improve the City's ability to prevent injuries and other workplace violations in and around last mile facilities. By licensing these facilities through the Department of Consumer and Worker Protection, the City can more easily enforce labor protections. We will have more influence over where last mile facilities open, allowing the City to address the concentration of warehouses and their potential harms in Black and brown

¹ NYC Comptroller Brad Lander, [Fast Shipping. Slow Justice: Traffic, Worker, and Climate Hazards in Last Mile Delivery](#), November 2025.



JUMAANE D. WILLIAMS

neighborhoods already fighting environmental injustices.

By ensuring that delivery drivers are directly employed by the company they are delivering packages for, we can centralize safety training and labor law enforcement, and ensure these workers' right to organize is protected. Companies that bust unions and skirt labor laws like Amazon will no longer be able to hide behind subcontractors and will be held liable for any and all violations.

Delivery work has become essential infrastructure. These workers kept our city running through the pandemic and are now central to the city's economy. They deserve dignity, safety, and fair treatment—not exploitation.

The Delivery Protection Act is not radical. It's common sense. It affirms that companies operating in our city must play by basic rules that protect workers and the public. It recognizes that growth without accountability is just a race to the bottom—and New York City won't participate in that race. This legislation demonstrates our commitment to responsible innovation, economic fairness, and protections for those who keep our city moving every day.

Let's show that in New York City, we protect workers. We demand accountability. And we won't let corporate giants write their own rules at the expense of working people.

Thank you.



MANHATTAN CHAMBER OF COMMERCE

TESTIMONY OF JESSICA WALKER

President and CEO, Manhattan Chamber of Commerce

Before the New York City Council

Committee on Consumer and Worker Protection

In Opposition to Int. 0518-2026

April 10, 2026

Good morning, Chair Epstein, members of the Committee, and Council Member Cabán. I am Jessica Walker, President and CEO of the Manhattan Chamber of Commerce, representing over 125,000 businesses across this borough, from corner bodegas and family-owned restaurants to professional services firms and the small logistics companies that keep our neighborhoods supplied with everyday essentials. We are deeply engaged in the affordability, livability, and economic vitality of this city, and we appreciate the Council's attention to the working conditions of delivery workers and the safety of our streets.

The Manhattan Chamber opposes Int. 0518 in its entirety. Let me be clear about why — because it isn't the reason the sponsors might assume.

I support every goal this bill claims to address. I want delivery workers to be safe. I want them paid fairly. I want our streets safer. I want real accountability. Those goals are not in dispute. The Manhattan Chamber has spent decades advocating for the workers and small businesses that are the backbone of this borough, and we recognize that the conditions documented in the City Comptroller's recent report are unacceptable. Injury rates at last-mile facilities triple the national average. Crashes around these facilities up 10 percent. Truck-involved injury crashes up 137 percent within a half-mile of these sites. These numbers demand a response.

What I oppose is the mechanism — because the mechanism this bill chooses doesn't achieve any of these goals, and it imposes serious collateral damage on small businesses and consumers in the process.

A Thirteenth Regulatory Regime Layered on Twelve Existing Ones

NYC's last-mile delivery industry is already regulated by twelve regulatory regimes. At the city level alone: the Department of Consumer and Worker Protection enforces labor and consumer protection law. The Department of Buildings governs warehouse construction and certificates of occupancy. The Fire Department conducts fire safety inspections. The Department of Sanitation regulates commercial waste handling. The Department of Transportation manages commercial vehicle operations, loading zones, and curb space. At the state level, the Department of Labor enforces wage and hour and workers' compensation law, the Department of Transportation regulates commercial vehicles, the Department of Environmental Conservation oversees emissions and hazardous materials, and the Attorney General's Labor Bureau prosecutes labor violations. At the federal level, OSHA enforces workplace safety, the National Labor Relations Board adjudicates labor relations and union activity, the Federal Motor Carrier Safety Administration regulates motor carrier operations, and the Environmental Protection Agency governs diesel emissions.

That is twelve regulatory regimes already governing every last-mile facility in this city. Int. 0518 adds a thirteenth without retiring any of the others. The right question this Committee should be asking isn't "should there be regulation?" It is: "Are the existing twelve regimes failing — and if so, why is the answer to create a thirteenth instead of properly resourcing and enforcing the twelve we already have?" To my knowledge, this Council has not asked that question. There has been no analysis of which existing regulatory authorities are being underused, no audit of DCWP's enforcement capacity, no review of where federal labor law is or isn't producing results in the cases currently before the NLRB. Before adding a new regulatory layer, the Council owes the public an honest accounting of why the existing layers are insufficient.

The Bill Would Destroy Small Businesses It Claims to Protect

Meanwhile, Int. 0518 would eliminate dozens of small businesses operating across the five boroughs and put thousands of New Yorkers out of work. These are not abstractions. They are independently owned local companies, many of them minority-owned, employing residents of the same neighborhoods they serve. They provide starting wages above \$20 an hour, healthcare, dental, vision, retirement contributions, paid time off, and tuition reimbursement. They are exactly the kind of small businesses this Council says it wants to protect, and exactly the kind this bill would put out of business overnight.

The bill's employee-retention provision does not soften this reality. It requires the operators that survive to rehire displaced workers, but it does nothing for the small business owners themselves. The Manhattan Chamber represents these businesses. We exist to fight for them. And we cannot endorse legislation that would dismantle them in service of a political objective they had no role in creating.

Worse, the bill would force the larger operators that remain to choose between two options: absorb workers on collective bargaining terms they never negotiated (a provision that contradicts five decades of settled federal labor law under the Supreme Court's Burns successor doctrine) or relocate facilities outside city limits. Because this bill regulates facilities, not deliveries, an operator that moves a warehouse fifteen minutes across the Hudson can continue dispatching drivers into every address in the five boroughs without obtaining a license, without complying with a single mandate, and without any accountability to New York City whatsoever. The trucks will still roll through the same neighborhoods. They will simply come from farther away, on longer routes, generating more emissions. This bill rewards companies that leave and punishes the ones that invest here.

A Tariff on Every New Yorker

This bill is the equivalent of putting a New York City tariff on every package brought into our city.

New York City processes approximately 2.5 million package deliveries every single day — roughly 900 million packages a year. Last-mile delivery operates on margins of just a few dollars per package. There is no profit cushion to absorb the new labor costs, capital costs, training costs, compliance costs, and litigation exposure this bill stacks onto every operator. Those costs flow downstream in the only direction they can go: to the consumer.

The people who pay this tariff are not corporations. They are the family in East Harlem ordering diapers because the local pharmacy ran out. The senior on the Lower East Side waiting on medications because she can no longer carry groceries up four flights of stairs. The working parent in Brooklyn who cannot get to a store before it closes. The disabled New Yorker for whom home delivery is not a convenience but a necessity. This Council has spent years working on affordability — housing, childcare, healthcare, groceries. Int. 0518 is fundamentally at odds with that affordability agenda. Every dollar this bill adds to the cost of delivered goods is a dollar taken from the pockets of the New Yorkers this Council has pledged to protect.

Real Solutions Exist — This Bill Is Not Among Them

If this Council is serious about delivery worker safety (and we believe it should be) there are five concrete interventions that would actually move the numbers documented in the Comptroller's report. None of them requires Int. 0518.

First, fully fund DCWP. The agency tasked with enforcing existing labor law and the contracted delivery worker protections that took effect this past January is under-resourced. Before adding a thirteenth regulatory regime, fund the twelve we have.

Second, regulate delivery quotas directly. If the underlying mechanism of injury is the unrealistic productivity targets that push drivers to skip breaks, drive recklessly, and ignore safety protocols, then regulate the targets. New York State has been considering legislation modeled on California's warehouse worker quota law. Pass a city version.

Third, mandate vehicle safety technology. Side guards on trucks, collision-avoidance systems, intelligent speed assistance, and automated emergency braking have measurable, documented effects on crash outcomes. The Council can mandate them through existing licensing and procurement authority.

Fourth, fix the streets around last-mile facilities. The Comptroller's data on crash increases is fundamentally a land use and curb management problem. Dedicated commercial loading zones, off-peak delivery incentives, protected bike lanes, and better truck routing all reduce conflicts between delivery vehicles and pedestrians — and the Department of Transportation has the authority to implement them today, without new legislation.

Fifth, require public reporting of injury and crash data by facility. If accountability is the goal, transparency is the tool. Operators should be required to publicly disclose their injury rates, crash rates, and OSHA violations on a per-facility basis, in a format the public and the press can actually use. Sunlight does work.

Every one of these interventions targets the actual mechanism of injury that the Comptroller documented. None requires a new licensing regime, a ban on subcontracting, or a half-million-dollar bond per driver. None would trigger the dismantling of a business model that employs thousands of New Yorkers. That is a false choice.

The Council Owes the Public an Honest Economic Analysis

Before this bill moves any further, the Council should commission an independent, unbiased economic impact analysis to truly understand the costs of Int. 0518 and who would bear them. The Council has not commissioned an analysis of how many small businesses would be displaced, how many jobs would be lost, how much delivery costs would rise, how those costs would distribute across income levels and neighborhoods, what the federal preemption exposure is, or what the litigation timeline would look like. A bill of this scope, with consequences this far-reaching for consumers and small businesses across all five boroughs, deserves that analysis before a vote, not after.

Conclusion

The Manhattan Chamber of Commerce represents over 125,000 businesses and the communities they serve. The concerns that motivated Int. 0518 — worker safety, fair treatment, corporate accountability — are legitimate and they deserve serious responses. But Int. 0518 is not a serious response. It is a sweeping intervention into an entire industry, built on contested federal labor doctrines, lacking economic analysis, and structurally unable to reach the operators most likely to relocate beyond its grasp. ***Its costs would fall on the small businesses we represent, the workers they employ, and the consumers across this city who depend on affordable delivery for the necessities of daily life.***

I urge this Committee to reject Int. 0518 and pursue real solutions instead. The Manhattan Chamber stands ready to work with this Council on legislation that would genuinely improve delivery worker safety, hold bad actors accountable, and protect both workers and consumers. This bill is not that legislation.

Thank you for the opportunity to testify. I am happy to answer any questions.

Chair Epstein and members of this committee:

My name is Lisa Sorin, and I am the President of the Bronx Chamber of Commerce. The Bronx Chamber is dedicated to supporting and advocating for local businesses across the borough, especially New York's smallest businesses. Thank you to the Council for continuing to engage with the small business community on workforce and regulatory issues.

I am here on behalf of the over 10,000 employees who will be severely impacted by this legislation, especially those in the Bronx whom I've had the opportunity to speak to.

There is a strong misconception that the Direct Service Providers (DSP's) mistreat their workers, and that this legislation would improve worker safety by ending the DSP model and mandating that companies like Amazon directly employ all workers. When preparing to make remarks on this bill, I took the time to speak with some of the Direct Service Provider (DSP) small business owners in the Bronx.

These are not faceless operators; they are entrepreneurs like Rudy, Jordan, Ron, Bashar, Ty, Amit, Joe, Kris and others who have built their businesses from the ground up. Those eight business owners alone employ over 1,200 people. They are all immigrants, veterans, or first-generation business owners who often started as delivery drivers themselves and worked their way up. They have achieved the American Dream, and are now working for their employees to do the same.

These DSP owners offer tuition reimbursement and workforce development opportunities, including HVAC training, ESL classes, and trade certifications. Many also provide loans, financial mentorship, and housing assistance, often helping individuals transition out of shelters and poverty. They are deeply embedded in their communities, including in the Bronx, where they host school supply drives, turkey giveaways, community barbecues, and sanitary product collections for women's shelters.

They, like any small business, offer something that large companies cannot replicate through direct employment: deeply personal, community-rooted relationships. Workers have direct access to their managers' cell phones and can turn to them for support during difficult times, an invaluable level of trust and connection that would be lost under this legislation. This is why their workers choose to work for these small businesses, instead of large multinational corporations. This bill is premised on the idea that these business owners and their employees would be better off working directly for large multinational corporations. It is not the Council's role to dictate to New Yorkers what their career will be. Taking away one's freedom to apply for and accept a job of their choice is not only wrong on a policy level, but on a moral one. Passing

a law that forces someone to shut down their business is morally wrong. Passing a law that puts one's employer out of business, and then forces them to work for an employer they do not want to work for, is morally wrong.

I know the supporters of this bill believe they are doing good. I ask those Council Members to more strongly consider the desires of those workers whose livelihoods will be impacted by their legislation. Thank you for the opportunity to testify and for your ongoing commitment to supporting workers and small businesses across New York City.



April 9, 2026

New York City Council
Committee on Consumer & Worker Protection
City Hall, 2nd Floor
New York, NY 10007

Testimony of the New York Women's Chamber of Commerce in Opposition to Intro. 518 (Delivery Protection Act)

Members of the Committee:

Thank you for the opportunity to submit written testimony regarding Intro. 518, known as the Delivery Protection Act.

The New York Women's Chamber of Commerce (NYWCC) is a not-for-profit advocacy and membership organization dedicated to assisting women entrepreneurs in achieving success and economic independence through business ownership, self-employment, and equitable access to economic opportunities. We work to level the playing field for women-owned and minority-owned enterprises by advocating for fair public policy, connecting business owners to networks and capital, and opening doors to procurement and growth opportunities.

NYWCC shares the Council's commitment to improving worker safety and accountability. However, we are concerned that Intro. 518, as currently drafted, could harm the very small businesses and many of the workers it seeks to protect.

Intro. 518 Would Burden Women-Owned Small Businesses With Heavy Compliance Costs

The bill proposes a broad licensing regime for last-mile facilities that deliver goods to consumers in New York City, requiring those operators to obtain a DCWP license and meet detailed safety, training, and employment criteria as a condition of operating. Under this structure, facility operators face multi-layered compliance obligations and enforcement mechanisms tied to licensure and renewal.

For the women-owned businesses we serve, particularly those in early-stage or microenterprise phases, navigating a complex new regulatory regime adds significant administrative and financial burden at a time when many are still scaling and accessing capital. The Council should be cautious about adopting frameworks that make it more costly and uncertain to operate, especially for enterprises that are still building stability and job-creating capacity.

Labor Mandates Threaten Operational Flexibility Critical for Small Business Growth

The bill also includes broad labor model requirements that would mandate direct employment for certain warehouse and delivery workers and prohibit third-party contracting for those services. Women-owned and minority-owned businesses – many of which are small employers or solopreneurs – often rely on flexible staffing models, contractors, and service providers to meet fluctuating demand, control costs, and seize growth opportunities. This bill makes these kinds of arrangements untenable and illegal, either for the small businesses NYWCC represents or their partners. In other words, Intro. 518 would make it that much harder to operate at precisely the moment when small businesses are trying to grow, hire, and innovate.

It is well documented that women-owned enterprises disproportionately face barriers in accessing capital, contracts, and scale-enabling resources. Policies that further restrict operational choices without clear evidence of net benefit risk reinforcing these barriers, reducing opportunities for job creation and long-term economic independence.

The Bill Risks Exacerbating Economic Inequities and Undermining NYWCC's Mission

Our mission is to promote economic independence and success for women entrepreneurs, particularly those from marginalized communities who already face structural challenges in accessing capital, markets, and contracting opportunities. Policies that create new barriers to business operation, raise cost thresholds, or restrict flexible labor relationships do not align with that mission.

Intro. 518 risks shifting costs and complexity onto the smallest businesses in the ecosystem, the very entities that contribute disproportionately to local job creation and community economic resilience. NYWCC businesses already face persistent gaps in procurement participation and capital access; adding regulatory layers that are not calibrated to scale or circumstance compounds those challenges.

Conclusion and Request

For these reasons, the New York Women’s Chamber of Commerce respectfully urges the City Council to oppose Intro. 518. We encourage the Committee to pursue targeted solutions that improve safety and accountability in the delivery sector without creating undue burdens on women-owned and minority-owned and small businesses – enterprises that are essential engines of local economic activity and opportunity.

We stand ready to work constructively with the Council and stakeholders to identify policy alternatives that protect worker safety, foster economic inclusion, and support small business growth in New York City.

Thank you for the opportunity to provide our perspective.

Sincerely,

A handwritten signature in cursive script, appearing to read "Quenia Abreu".

Quenia Abreu

President & CEO

New York Women’s Chamber of Commerce

1524 Amsterdam Avenue, New York, NY 10031

Tel: (212) 491-9640

info@nywcc.org



April 9, 2026

New York City Council
Committee on Consumer and Worker Protection
City Hall, 2nd Floor
New York, NY 10007

Re: New York City Hispanic Chamber of Commerce Testimony Opposing Int. 518-2026

Dear Chair Epstein and Members of the Committee:

The New York City Hispanic Chamber of Commerce (NYCHCC) is proud to be a citywide voice for Hispanic entrepreneurship and local business growth. Our mission is to promote the economic growth, development, and interests of Hispanic-owned businesses by connecting our members with the networks, resources, and support needed to start, expand, and succeed in New York City.

Thank you for the opportunity to submit written testimony regarding Int. 518-2026, a proposal to amend the New York City Administrative Code to require the licensing of “last-mile facilities” and to impose new operating conditions related to safety, training, and employment practices.

NYCHCC appreciates the Council’s focus on safety and accountability in a fast-changing delivery and logistics sector. We share the goal of protecting workers and the public. However, Int. 518-2026 is not a workable approach. It risks unintended and severe—consequences for Hispanic-owned small businesses, Hispanic entrepreneurs in the logistics ecosystem, and many of the very workers the bill is meant to protect.

For those reasons, NYCHCC respectfully urges the Committee to oppose Int. 518-2026 to avoid harming small businesses and working New Yorkers.

Int. 518-2026 is sweeping in scope and will impact far more than “big warehouses”

The bill defines a “last-mile facility” broadly as a warehouse, storage facility, or other location that receives goods as part of a delivery supply chain, from which goods are delivered to consumers in the City (including via transfer points for “sustainable modes of transport”).

NYCHCC is concerned that this definition and the bill’s structure treat very different types of operations the same, even though the risks, traffic patterns, workforce models, and neighborhood impacts can vary dramatically. Under a broad umbrella, the bill could capture facilities and operations that are not what most New Yorkers think of when they hear “last-mile warehouse” including small and mid-sized sites that support neighborhood commerce and enable small merchants to compete.

That matters because Hispanic-owned businesses are deeply represented across local retail, wholesale, food and beverage distribution, personal care, consumer packaged goods, and emerging e-commerce brands, many of which rely on third-party logistics and delivery networks to reach customers citywide. When policy is designed around the largest actors in the market but applies broadly, the predictable result is that the smallest businesses pay the steepest price.

A conditional licensing regime increases uncertainty and raises barriers for small and mid-sized operators

Int. 518-2026 would make it unlawful to operate a covered last-mile facility without a license for each place of business. It also adopts a licensing framework where renewal, suspension, or revocation can be tied to a wide range of findings and “violations” across many areas of law, and it requires disclosure of prior determinations related to workplace safety, road safety, environmental protection, consumer protection, and worker protections.

NYCHCC’s concern is not with basic licensing in concept; it is with how this bill structures licensing as a powerful gatekeeping tool in a sector that many small businesses depend on, while giving the City broad authority to expand requirements through rulemaking.

For smaller operators and new entrants – including minority entrepreneurs trying to build legitimate businesses – this kind of framework can create:

- New barriers to entry as a result of legal, compliance, administrative burdens;
- Higher ongoing costs from document retention, audits, reporting, training management requirements;
- Greater and continued uncertainty about whether a business can reliably operate and invest long-term; and
- Competitive advantage for the largest incumbents, who can spread compliance costs across massive operations.

In other words: this bill risks consolidating the market, making it harder for smaller and MWBE-adjacent firms to survive and compete.

The bill’s “direct employment” requirements and subcontracting ban threaten Hispanic entrepreneurship and job pathways

NYCHCC is especially concerned with the bill’s approach to labor models. The bill would require “direct employment” of workers providing “core warehouse services” at covered facilities. It would also require “direct employment” for delivery workers providing “core delivery services” on a part-time or full-time basis (including those working more than 8 hours in any 30-day period). Critically, the bill goes further by broadly prohibiting contracting with third parties (including staffing agencies and subcontractors) for the performance of core warehouse and delivery services.

From the perspective of Hispanic economic development, this is not a narrow technical change. It is a structural mandate that risks **eliminating legitimate Hispanic-owned small businesses**, including, for example, local delivery and courier companies serving specific neighborhoods or boroughs, staffing firms providing lawful, seasonal workforce support, and small logistics operators and independent contractors building a pathway to business ownership.

For many immigrant and Hispanic entrepreneurs, subcontracting – when done lawfully – has historically served as a stepping-stone to stable business formation: build a client base, hire locally, grow gradually, invest in vehicles and training, and eventually expand. A blanket ban does not distinguish between bad actors and good actors; it simply removes an entire set of business models from the market.

And when those models disappear, what often replaces them is not “better work.” It is less work, more consolidation, and fewer local businesses, because only the largest firms can absorb the transition costs.

Cost drivers in the bill could force service reductions that hurt merchants, consumers, and workers

Beyond licensing and labor structure, Int. 518-2026 imposes layered operational requirements that will materially increase costs and complexity. For example, during any period where contracted workers are used, the bill would require extensive recordkeeping about delivery workers, including identities, proof of commercial auto insurance, driving records, and detailed route records. It also requires a certification that drivers have employer identification displayed prominently on clothing and vehicles.

Most notably, the bill would require facility operators to post a \$500,000 bond for each delivery worker retained as a non-employee. That is an extraordinary requirement and one that is likely to be financially prohibitive for many operations, particularly where delivery needs fluctuate and where work is performed by a mix of individuals who may only intermittently deliver from a covered facility. The bill also creates a City-certified training structure requiring at least six hours of training on a detailed list of topics, and requires new workers to receive training within 92 days and then annually thereafter. Finally, the bill imposes employment process mandates, including a 30-day notice of termination (absent “egregious misconduct”), and creates enhanced remedies and penalties, including a private right of action for certain provisions.

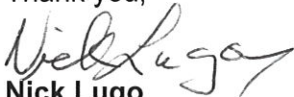
NYCHCC’s concern is practical: when compliance becomes too expensive and too rigid, businesses react by shrinking service, automating, consolidating, or relocating. None of these outcomes are good for neighborhood commerce or for worker opportunity.

The Council should reject this bill

For the reasons above, the New York City Hispanic Chamber of Commerce respectfully opposes Int. 518-2026 as drafted. The bill’s broad scope, prescriptive labor model mandates, and layered compliance costs risk harming Hispanic-owned businesses and Hispanic workers by making legitimate operations harder to sustain and by narrowing the very pathways to entrepreneurship that have helped many New Yorkers build economic stability.

We appreciate the Committee’s attention to these concerns and stand ready to work with the Council on alternatives that improve safety and accountability without sacrificing jobs, neighborhood commerce, and small business growth.

Thank you,



Nick Lugo
President & CEO

New York City Hispanic Chamber of Commerce (NYCHCC)
159 E. 116th Street
New York, NY 10029
(212) 348-2339
info@nychcc.com



Testimony from Amazon
Introduction No. 0518-2026, Licensing of Last Mile Facilities
New York City Council - Committee on Consumer and Worker Protection
April 9, 2026

Chair Epstein and Members of the Committee, thank you for the opportunity to submit testimony in opposition to Introduction No. 0518-2026.

Our commitment to providing safe, fast, and affordable delivery to New Yorkers is central to everything we do in this city. If enacted as written, Introduction No. 0518-2026 would directly undermine that commitment by threatening the more than 40 local small businesses we partner with to deliver to Amazon customers and the jobs of the more than 5,000 people they employ. It would also compel us to seriously examine how we could still meet our commitment to New Yorkers—which includes the potential for relocating operations and delivery facilities outside of New York City.

Delivery Service Partners Are New York Success Stories

Introduction No. 0518-2026 would prohibit our agreements with more than 40 local small businesses known as Delivery Service Partners (DSPs), who provide jobs to thousands of New Yorkers from the communities and neighborhoods they serve.

The DSP program offers one of the most accessible paths to business ownership available today. DSPs are small, local business owners who make their own decisions about hiring, fleet management, capacity planning, and route assignments, while leveraging Amazon's logistics expertise to build scalable businesses. In New York, DSPs reflect the city's diversity and entrepreneurial spirit: 25% are owned by Black or Hispanic entrepreneurs, 10% are veteran-owned, and 10% are graduates of our Road to Ownership program—an accelerated pathway that helps high-performing DSP employees become business owners.

Consider DSPs like Jordan Rodriguez who owns One Dream Logistics in the Bronx, Roman Dekhterman who owns Falcons Deliveries on Staten Island, or Juan Martinez who owns COPR Industries in Brooklyn. DSPs in New York City hire locally and have built sustainable businesses rooted in their communities. They also provide competitive pay and benefits — since January 2025, DSP drivers in New York City have earned an average of nearly \$24 per hour in wages. All DSPs are required to offer health care coverage to full-time employees and they provide paid time

off that exceeds the city's minimum by 20%. Many also offer additional benefits, including retirement accounts, tuition reimbursement, and career development opportunities.

Working for a DSP means being part of a smaller team where drivers have direct communication with ownership and management. DSP owners understand their communities' specific needs and can offer flexible scheduling that accommodates student populations, caregivers, and workers balancing multiple responsibilities. Having more than 40 DSPs operating in NYC means drivers can choose the employer that best matches their priorities—a level of choice and workplace culture that wouldn't exist under the mandated single-employer model created in Introduction No. 0518-2026.

Safety and Innovation Support Fast and Affordable Delivery

Much of the debate concerning Introduction No. 0518-2026 relates to misconceptions around the safety of our operations and how it impacts our partners. The safety of our employees, partners, and the communities we operate in is our top priority.

Since 2019, we've demonstrated consistent and significant safety improvement at our facilities, with our Recordable Incident Rate improving by 43% and our Lost Time Incident Rate improving by 70% across our global operations.

We've also invested more than \$2.5 billion to advance safety progress since 2019. This includes millions of dollars in safety technology and training. More than 180,000 drivers have completed in-person training through our Integrated Last Mile Driver Academy using virtual reality driving headsets and slip-trip-fall simulators to master delivery fundamentals and safety protocols, including techniques for navigating icy sidewalks, wet driveways, and snow-covered steps.

DSPs leverage on-road technology to promote safe driving in their delivery vans. DSP delivery vans are equipped with camera-based systems that provide real-time feedback on driving behaviors. When unsafe behaviors are detected, drivers receive alerts during delivery stops, and DSPs are notified so they can provide additional coaching to their drivers. In part because of technology like this and the operational excellence of DSPs, the serious crash rate in New York City improved by 35.7% from 2024 to 2025.

In Manhattan and Brooklyn, DSPs have deployed more than 800 electric cargo bikes that bring packages and groceries to customers, reduce traffic congestion, and produce lower tailpipe emissions. These e-cargo bikes — which cannot travel faster than 12 miles per hour — are particularly well-suited for New York City's dense urban environment, allowing for efficient last-mile delivery while supporting the city's sustainability goals.

Our Delivery Operations in New York City

Amazon supports more than 25,000 full- and part-time employees in New York City — more than 2,000 of whom work at our local delivery facilities that operate in all five boroughs. At these facilities, employees prepare packages for delivery to their friends and neighbors. The facilities also serve as staging areas where DSPs and their teams load delivery vans and electric cargo bikes, start their delivery routes, and maintain their operations.

Introduction No. 0518-2026 also creates significant uncertainty for any company where even the smallest of administrative errors—such as incomplete training documentation and housekeeping citations—could accumulate across facilities and trigger disproportionate consequences, including operations shutdowns.

To maintain our commitment to providing safe, fast, and affordable delivery to New Yorkers, we'd be compelled to seriously examine how we could still meet that commitment —which includes the potential for relocating operations and delivery facilities outside of New York City.

Conclusion

New York City is a great place to live and work. We're proud to be lending our support in many different ways to great organizations across the city. Since 2022, we've donated more than \$15 million to food security efforts, surpassed 50 million pounds of food donated to City Harvest, invested in STEM education and library programs across all five boroughs, and committed nearly \$5 million through our Career Choice program to help employees earn degrees and certificates. These investments reflect our long-term commitment to New York City.

We're committed to creating good jobs, supporting our thousands of employees and local small business partners in New York City, and providing fast, affordable delivery in a safe working environment. As written, Introduction No. 0518-2026 would directly undermine that commitment, threatening the more than 40 Delivery Service Partners we work with in New York City every day and putting the jobs of their more than 5,000 employees at risk. It would also force us to consider relocating delivery operations outside of the city. We're trying to prevent that by working collaboratively with the City Council, and we've invited every member to visit our delivery stations and meet with these partners and their employees before voting on legislation that could eliminate their businesses and displace thousands of New Yorkers from their jobs.

Thank you for your consideration.



BRANDON MANCILLA
DIRECTOR, REGION 9A
350 West 31st Street, 7th Floor
New York, NY 10001
PHONE: (212)-529-2580
FAX: (212)-529-1986

INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA – UAW

SHAWN FAIN, *PRESIDENT* • MARGARET MOCK, *SECRETARY-TREASURER*
VICE-PRESIDENTS: LAURA DICKERSON • MIKE BOOTH • RICH BOYER

**TESTIMONY OF THE UAW NYC POLITICAL COUNCIL IN SUPPORT OF INTRO 518-2026 BEFORE THE NEW YORK CITY COUNCIL COMMITTEE ON CONSUMER AND WORKER PROTECTION
APRIL 9, 2026**

My name is Richard Blum. I am a long-time member of the Association of Legal Advocates and Attorneys, UAW Local 2325, and I submit this testimony in support of Intro 518-2026 on behalf of the UAW NYC political council, representing 20,000 members in New York City across a diverse range of sectors from legal services to cultural workers and post-doctoral researchers to auto-technicians.

In recent years, the UAW has been at the national forefront of militant action in manufacturing and organizing, particularly in the South, the most anti-union part of the country. And here in and around New York City, we have been deeply engaged in organizing workers in legal services (my area), higher education, and non-profit organizations and we have engaged in numerous strikes. We are acutely aware of the stratagems that large wealthy and well-resourced businesses and organizations use to defeat worker power.

One of the tactics that large very successful businesses use is to act as if they have no special relationship with or responsibility for their workforce, the very workers whose labor makes these companies wealthy. To borrow from the former U.S. Wage & Hour Administrator David Weil, these businesses “fissure” off large swaths of their workers and treat them as if they themselves are nothing more than other businesses. For example, applications that have tens of thousands of drivers transporting customers or delivering food and other goods and bringing in enormous income to the companies pretend that the drivers are each of them an independent business with which they are in a purely commercial relationship. The companies get rich off the drivers’ labor but insist that these workers are not their “employees” to avoid any responsibility for the drivers under labor and employment laws.

So, too, with the last-mile delivery industry and the workers who work in it. A very capitalized company may control every aspect of the work of last-mile delivery workers yet disclaim any employment relationship with them. In one scenario, such companies pretend that these workers are really just small businesses that, coincidentally, provide services only to the larger companies. The Second Circuit Court of Appeals recently rejected a bakery’s argument that its delivery workers were not “transportation workers” but rather businesses because the bakery

had required them each to incorporate. *Silva and Rothkugel v. Schmidt Baking Company*, 162 F.4th 354 (2d Cir. 2025). But these dodges continue. FedEx has spent well more than a decade arguing that its drivers are independent contractors in business for themselves.

As common in the last-mile delivery industry, the capitalized company, for example, Amazon, claims that because the drivers are employed directly by a middleman operation -- that is entirely beholden to it -- the workers are not the employees of the capitalized company and Amazon owes no obligations to the workforce under labor and employment law. Capitalized companies operate through these middlemen, disclaiming any relationship with the delivery workforce even as the larger companies retain control over all of the workers' work: their pace, quotas, health and safety, even specific routes.

These fictions of no responsibility seek to prevent workers who are vital to the larger company's operation from making any claim on the company as employees, specifically under labor and employment laws. It allows the last-mile delivery companies to renounce responsibility to these workers under employee health and safety laws, with repercussions not only for the workers but for the public as well.

The result of the capitalized companies' disclaimers of labor and employment obligations, including health and safety requirements, is that the capitalized companies that are enjoying the profits of this set up are left unaccountable for the consequences of the requirements they impose on the middlemen and the workers. If a worker complains to a regulatory agency that they are being made to meet delivery quotas at a pace that ensures that they will be injured on the job or that they will have an accident at some point, the capitalized company that runs the entire operation will say that the middleman, for example, a DSP, is entirely and uniquely responsible as the employer of the worker. By avoiding any penalties or other law enforcement as the employer, the capitalized company has no incentives to discontinue its imposition of dangerous requirements. When David Weil studied wage theft in the fast-food business, he found that franchises were much more likely to engage in wage theft than company-owned stores where the liability extended to the principal company.

New York City does not have to tolerate such dangerous evasions of responsibility. Intro 518, by requiring the licensing of last-mile facilities and requiring that such facilities directly employ workers who are providing core services, would bring an out-of-control industry under public regulation. It would make large businesses accountable to their workforces and to the public. By being held to employee health and safety laws, such companies would have to ensure that drivers are not subjected to unsafe requirements that endanger the public in turn.

The attempt to bring businesses in the last-mile delivery industry under public regulation for the sake of the workers and the public has brought the inevitable litany of tired opposition lines:

Businesses will leave the City.

Honoring workers' rights will make products unaffordable for the consumers.

Eliminating the middleman structure will cost jobs.

First, these businesses are not going to up and abandon the New York City market. There is no amount of regulation from this bill that would induce them to forego this gold mine. And there is no way that companies that have built empires on incredibly fast provision of goods are base their last-mile delivery operations out of the borders of the City, that is, to make them last ten or twenty-mile delivery systems that have to contend with bridge and tunnel and suburban highway traffic.

Second, these arguments ignore that consumers are workers, too, and that workers are consumers. Putting more money into the pockets of workers primes the economy and produces economically beneficial ripple effects. Preventing accidents provides lowers costs and well as saving lives of workers and random members of the public.

Third, while it is true that requiring direct employment eliminates the middleman structure, it does not mean that job will be lost. The large companies will still need staff to perform all of the logistical work that is currently being performed through DSP's. This change will mark a change in status for some and requires a transition period, but it is simply not a job killer. It is, on the other hand, a life saver for workers and the public.

With Intro 518-2026, New York City can stem the tide of corporate evasion of responsibility at the expense of workers and the public. The UAW NYC Area CAP wholeheartedly supports this legislation.



LOCAL 804 - DELIVERY AND WAREHOUSE EMPLOYEES

An Affiliate of

INTERNATIONAL BROTHERHOOD OF TEAMSTERS

44 SOUTH BAYLES AVE, PORT WASHINGTON, NY 11050 -TEL. (718) 786-5700 - FAX # (718) 786-5757
EMAIL: EXECUTIVEBOARD@TEAMSTERSLOCAL804.ORG WWW.TEAMSTERSLOCAL804.ORG

My name is Josh Pomeranz and I am testifying in favor of the Delivery Protection Act Intro 518. I am the Director of Operations for Teamsters Local 804 and we recently issued a new report documenting growing safety hazards caused by the explosion of e-commerce and last mile delivery and the need for new protections for workers and the public. This report is comprised of two documents: (1) a 34-page narrative study on traffic safety, courier risk, and operator accountability, and (2) a companion quantitative data analysis with charts and proxy fleet tables. Every statistic is sourced and citable — the report is designed for public record use. The hazards described in the report affect both delivery workers and the public. Passage of the Delivery Protection Act will sufficiently but not onerously address the serious issues found in the report.

Since covid, there has been an explosion in package delivery within New York City. Daily package deliveries in NYC grew from 1.8 million before COVID to 2.5 million in 2024. This has led to increased traffic issues and accidents, particularly as it relates to double parking, parking in bike lanes and other hazards. Data shows that e-commerce vehicles have driven an increase in safety-entailed traffic and parking citations and violations, and that these violations have increased in particular in residential outer boroughs. There are also worker safety issues related to the immense pressure put on drivers to deliver quickly. This industry is essentially unregulated and needs to be to protect the public and workers.

Our research showed a connection between length on the job and road safety. Drivers with low experience have a higher level of accidents and injuries. Therefore, there is a direct connection between turnover and accidents.

For the City to address the dual goals of holding the owners and operators of last mile facilities accountable for the vehicles dispatched from that facility and the vehicle hazards created by intense workloads, as well as reduce driver accidents, drivers need a direct relationship with the facility operators who create the conditions. New commercial motor vehicle drivers, particularly in their first year, are dramatically more likely to be in accidents. Studies show years-on-the-job is the strongest predictor of accidents. In fact, when comparing a last mile delivery provider such as UPS, with a contractor model such as Amazon, we see that 46% of amazon drivers had less than 1 year on the job as compared to 2% by UPS.

The attached report is far more detailed than this statement and is attached as an exhibit.



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EMAIL: EXECUTIVEBOARD@TEAMSTERSLOCAL804.ORG WWW.TEAMSTERSLOCAL804.ORG

The Last Mile in New York City

This report is composed of two parts:

1. “Urban Last-Mile Delivery: Traffic Safety, Courier Risk, and Operator Accountability,” a narrative study that details each of the following aspects of the last-mile, e-commerce delivery industry in New York City: its growth and current size; its safety impacts, particularly vehicle and pedestrian safety, through a quantitative study (see part 2); the systematic and inherent under-enforcement of safety-entailed vehicle citations; the characteristics of the industry’s driver workforce; the high turnover and its connection to traffic and vehicle safety; the nature and high degree of facility operator control over the speed, volume, and pace of package deliveries; the challenges of accountability given the use of interposed contractors; and the need for a genuinely responsive and appropriate “safety climate” to abate the hazards created by the industry on city streets.
2. “NYC Last-Mile Delivery Safety: Data Analysis, Methodology, and Proxy Fleet Findings,” a quantitative study looking at the actual violations of known last-mile vehicles over a five-year period, an estimate of the “e-commerce cohort” of last-mile vehicles and the rate of citations issued to that cohort, and the migration of safety-entailed vehicle citations into the more residential outer boroughs. Accompanying this study is the raw data used to make the calculations.

Urban Last-Mile Delivery: Traffic Safety, Courier Risk, and Operator Accountability

March 2026

TABLE OF CONTENTS

1. INDUSTRY SCALE AND GROWTH..... 5

2. NYC E-Commerce FLEET CHARACTERISTICS..... 6

3. CITATION DATA: THE PROXY FLEET ANALYSIS..... 6

4. UNDER-ENFORCEMENT: THE GAP BETWEEN VIOLATIONS AND CITATIONS 8

5. ESTIMATED TOTAL SAFETY-RELATED VIOLATIONS 9

6. ENFORCEMENT RESOURCE IMPLICATIONS 10

7. NYC CRASH DATA AND THE IMPACT OF LAST-MILE FACILITIES 11

8. DOUBLE PARKING: SAFETY MECHANICS AND CONSEQUENCES 11

9. BIKE LANES: PROTECTIVE VALUE AND THE CONSEQUENCES OF OBSTRUCTION..... 13

10. BUS LANES: SAFETY BENEFITS AND CONSEQUENCES OF BLOCKAGE 14

11. FIRE HYDRANT OBSTRUCTION: SCALE, FATAL CONSEQUENCES, AND FIRE SCIENCE. 14

12. WORKFORCE TURNOVER IN THE LAST-MILE DELIVERY INDUSTRY 16

13. JOB TENURE, DRIVER EXPERIENCE, AND OCCUPATIONAL INJURY RISK..... 18

14. COMMERCIAL MOTOR VEHICLE DRIVERS SPECIFICALLY 21

15. THE TURNOVER-EXPERIENCE-ACCIDENT-INJURY CONNECTION IN LAST-MILE DELIVERY..... 21

16. APP-PLATFORM WORKERS AND PRECARIOUS EMPLOYMENT INJURY DIFFERENTIALS AROUND THE GLOBE 22

17. DELIVERY DRIVER FATALITY RATES VS. OTHER OCCUPATIONS 23

18. WORKER INJURY RATES AT NYC LAST-MILE FACILITIES 23

19. DELIVERY OPERATIONS AND MOTOR VEHICLE SAFETY..... 24

20. SAFETY CLIMATE AS A PREDICTOR OF ACCIDENTS 26

21. LAST-MILE FACILITY OPERATOR CONTROL ARCHITECTURE & its spread..... 29

22. VEHICLE INSPECTION, FLEET SAFETY, AND VEHICLE MAINTENANCE COSTS. 30

23. LIABILITY, ACCOUNTABILITY, AND SAFETY OUTCOMES 32

24. NEW YORK CITY'S REGULATORY AUTHORITY OVER TRAFFIC SAFETY AND LIABILITY GENERALLY..... 32

CONCLUSION..... 33

Summary

E-commerce has put just about any product a consumer could ever want or need just a few finger-taps away. Consumer behavior has structurally moved towards e-commerce. The slick digital interface of e-commerce hides the gears and guts of last-mile delivery. Competing with brick-and-mortar retail means that e-commerce retailers need to constantly decrease the window of time between an order being placed and the arrival of those goods. This means a literal race to the bottom, all on New York City’s commercial strips and residential streets.

Consumers’ structural shift towards e-commerce was accelerated by the COVID-19 pandemic and lockdown. The infrastructure (and labor pool) for rapid home delivery of basic goods came together at breakneck speed to address a national emergency, and this shock induced behavioral shifts in consumers that may otherwise have taken a decade to gain ground. E-commerce for everyday goods arrived in our city in a flash.

New York City has had little time to respond to this fundamental change in shopping patterns. Cities like New York are not really designed for home delivery of daily-need consumer goods. New York’s land use pattern is meant to keep residents clustered together near designated commercial strips, so they can walk or take a bus to acquire their daily needs. Last-mile delivery completely inverts this: rather than residents making quick, short trips to buy what they need—or stopping on the way to and from work or school—they now have the products brought to them, in particular along often congested residential streets.

This paper lays out the myriad ways in which the rapid growth of last-mile delivery and its related vehicle safety problems has burdened the public right of way for motorists, cyclists, and pedestrians, and inhibited the right of way generally.

The problem is logically self-evident, and also supported by both recent analyses and generations of past data and studies, all of which elucidates the following story:

- (1) Last-mile operators compete on the basis of price and speed; *and so*
- (2) Packages have to be delivered as quickly and cheaply as possible; *and so*
- (3) Turnover is structurally high among last-mile facility workers and couriers (i.e., drivers); *but*
- (4) New workers—particularly those in their first year—are much more likely to be involved in accidents and injuries, and this is particularly true of drivers, who face complex “workplace” challenges on New York City’s public streets; *and also*
- (5) High delivery quotas place unmanageable pressure on drivers; *and so*
- (6) Drivers are pushed to “cut corners” even when it feels unsafe by, for example, double parking when spots are available, stopping in bike or bus lanes, parking on crosswalks, speeding, and blocking hydrants; *but*
- (7) The City could never “ticket” this behavior out of existence, as the frequency of this conduct is simply too high, in the millions of annual violations just for a single e-commerce fleet of a few thousand vans; *yet*
- (8) These types of “safety-entailed” vehicle traffic violations have a cascading effect. For example, double-parking, even legally, causes motorists to swerve into oncoming traffic they cannot see and obscures sight-lines for pedestrians crossing streets; *meanwhile*

- (9) The industry increasingly interposes contractors between the facility operators and couriers who are ultimately responsible for these hazards, as a way for these operators to disclaim accountability for the right-of-way hazards they create.

For these reasons and to address these concerns, the City needs to develop the tools to ensure and enforce adequate safety compliance at the front end, from the entities creating—and who have the ability to prevent—these hazards on our streets.

1. INDUSTRY SCALE AND GROWTH

The volume of parcels shipped in the United States grew nearly 61% between 2014 and 2022, rising from 13.2 billion to 21.2 billion parcels¹ annually. After a brief post-pandemic softening, volume has resumed its upward trajectory. Industry analyst ShipMatrix projects U.S. parcel market volume will grow at a compound annual rate of approximately 4% through 2027, reaching 26.8 billion packages—a volume that translates directly into the number of vehicle trips, driver hours, and street-level stopping events occurring daily in every major American city.² Amazon Logistics alone shipped 6.3 billion packages in 2024—a 6.78% year-over-year increase and a 688% increase from Amazon’s 2018 delivery volume. Amazon, currently the fastest-growing last-mile operator by volume in the United States, is setting the industry standards. Still, among major carriers, only FedEx experienced a volume decline from 2023 to 2024, falling 3.6%. These figures establish Amazon as the dominant growth force in last-mile delivery, with its attendant share of street-level delivery activity.³

Daily package deliveries in New York City grew from 1.8 million before the COVID-19 pandemic to 2.5 million in 2024. Approximately one in three New York City residents receives a package daily. This growth in delivery density means that in the most affected neighborhoods—particularly lower-income neighborhoods near large last-mile facilities—every day involves thousands of delivery van stops, route sequences, and street-level interactions with pedestrians and cyclists that did not exist at the same scale a decade ago.⁴

Amazon’s share of U.S. e-commerce retail sales reached approximately 40% in 2024.⁵ Applied to New York City’s estimated 2.5 million daily e-commerce packages, that market share implies a minimum of one million packages per day delivered by or on behalf of Amazon in the City.⁶

Estimates for the number of last-mile facilities and last-mile facility operators that are the subject of this report are difficult to obtain, reflecting the opacity of the industry. Nevertheless, some estimates are feasible based on known players in the last-mile delivery industry who have sufficient market share and size. A last-mile facility operator must have sufficient capital to create and control the architecture of delivery details—i.e., they need to have the means to monitor couriers and set the pace and volume of deliveries in real time—to be the type of facility operator with which this report is concerned. Total parcel delivery of all types would be a conservative estimate of 2 million per day, based on the Comptroller’s study. Relevant entities with sufficient control capacity would be Amazon, UPS, FedEx, DHL, and *potentially* companies including OnTrac, Veho, Gofu, UniUni, and RoadieXD. Given parcel volumes from self- and industry reporting and based on typical courier loads for vans versus personal vehicles (e.g., approximately 250 and 50, respectively), the total universe of facilities covered that are in or service New York City would be approximately 25 to 40. The total universe of covered couriers would be approximately

¹ *Parcel shipping volume in the United States from 2014 to 2022*, STATISTA (Nov. 29, 2025), <https://www.statista.com/statistics/1178991/parcel-shipping-volume-united-states/>. “CEP” stands for Courier, Express, and Parcel, the industry classification covering domestic package delivery services. “Compound annual growth rate” (CAGR) is the year-over-year percentage growth rate that would produce the same cumulative result as the observed growth over the period.

² *U.S. CEP Market Overview*, STATISTA (Dec. 17, 2025), <https://www.statista.com/topics/4063/courier-express-and-parcels-cep-market-in-the-united-states/>; *Press Release on U.S. Domestic Parcel Market Report 2024*, SHIPMATRIX (Apr. 10, 2025), https://shipmatrix.com/wp-content/uploads/2025/04/SMX-Press-Release-on-parcel-market-for-2024_4.10.2025.pdf.

³ *Package Delivery Statistics*, CAPITAL ONE SHOPPING RESEARCH (Aug. 29, 2025), <https://capitaloneshopping.com/research/package-delivery-statistics/>.

⁴ *New York City Comptroller Brad Lander*, FAST SHIPPING. SLOW JUSTICE: TRAFFIC, WORKER, AND CLIMATE HAZARDS IN LAST-MILE DELIVERY (Nov. 17, 2025), <https://comptroller.nyc.gov/reports/fast-shipping-slow-justice-traffic-worker-and-climate-hazards-in-last-mile-delivery/>.

⁵ Sara Lebow, *Amazon Will Surpass 40% of US Ecommerce Sales This Year*, EMARKETER (Apr. 17, 2024), <https://www.emarketer.com/content/amazon-will-surpass-40-of-us-ecommerce-sales-this-year>.

⁶ FAST SHIPPING. SLOW JUSTICE, *supra* note 4.

12-14,000, and the universe of covered warehouse workers, given the number of facilities actually in the City, would be around 5-7,000.

2. NYC E-COMMERCE FLEET CHARACTERISTICS

Despite the general economic trend towards “disintermediation”—or the elimination of middlemen in favor of connecting retailers directly with consumers—e-commerce and last-mile delivery are characterized by interposition, at least when it comes to couriers. Specifically, the interposition of “contractors” between last-mile facility operators and the drivers they in practice direct and control is developing into a widespread industry model. Amazon calls its interposed contractors “delivery service partners” or “DSPs.” FedEx has a version of this intermediary model as well, where it claims that it does not directly employ the drivers delivering FedEx packages in FedEx uniforms across the country. Amazon operates its New York City deliveries through this nationwide contractor model, known as the “DSP program.” DSPs are nominally independent small businesses that employ drivers on paper and in theory bear the formal responsibilities of an employer-of-record—including payroll, workers’ compensation, and human resources functions (though facility operators often involve themselves even in these matters).⁷

But these breeds of interposed contractors are not truly independent carriers of any kind; they are under-capitalized—if they are capitalized at all—and have no assets beyond their often exclusive contract with companies like Amazon as the last-mile facility operator. It is the last-mile facility operator that unilaterally sets work speed requirements, delivery windows, productivity metrics, customer ratings standards, and vehicle specifications, including not only the vehicles to be used but often the specific vendors from whom the interposed contractors have to buy or lease.⁸ These contractors are not even akin to franchisees, who have to conform to franchisor standards but maintain meaningful managerial independence. These interposed contractors are instead nothing more than captive liability shields for the facility operators, who do not even control the surveillance or work speed of their own “employees.” These contractors in essence have no control over the operational details of deliveries. They are more proximate to an in-house temp agency than a “carrier,” because they are not really in the package delivery business; they are in the business of “providing” employees for facility operators like Amazon to use to deliver their packages in the manner they desire. Amazon did not invent the sham contractor model, but by virtue of its market size, it has set the industry standard, with other companies following its lead.

3. CITATION DATA: THE PROXY FLEET ANALYSIS

Prefatory Note: This Part is based on an original analysis of New York City parking and traffic citation data for fiscal years 2021–2025, queried directly from the NYC Open Data Department of Finance Parking Violations Issued datasets via the Socrata API. The full methodology is documented in the companion report, *NYC Last-Mile Delivery Safety: Data Analysis, Methodology, and Proxy Fleet Findings* (Mar. 2026). All figures are complete for all five fiscal years.

This analysis examines the New York City parking and traffic citation record for 1,553 license plates identified from the NYC Open Data idling-violation database, as associated with Amazon-related companies registered in Seattle, Washington. Of those 1,553 plates, 637 received at least one citation across the 25 queried violation codes during fiscal years 2021–2025. The remaining 916 plates returned no citations in that dataset, but the absence of a citation is not evidence of legal parking. As documented in Part IX, the published NYC enforcement rate for parking violations is approximately 2–11%, meaning the

⁷ *Id.*

⁸ Patricia Callahan, *The Deadly Race: How Amazon Hooked America on Fast Delivery While Avoiding Responsibility for Crashes*, PROPUBLICA (Sept. 5, 2019), <https://features.propublica.org/amazon-delivery-crashes/how-amazon-hooked-america-on-fast-delivery-while-avoiding-responsibility-for-crashes/>.

majority of parking violations generate no citation at all. The 916 plates that returned no citations should be understood as vehicles for which violations were not ticketed, not vehicles that parked lawfully.⁹

Citations by fiscal year for the 637-plate proxy fleet: **FY2021**: 2,688 citations (377 active plates); **FY2022**: 3,524 citations (488 plates); **FY2023**: 4,261 citations (555 plates); **FY2024**: 2,954 citations (518 plates); **FY2025**: 1,663 citations (376 plates). **Five-year total**: 15,090 citations from 637 unique plates.¹⁰

Of the 15,090 total citations, 4,703 (31.2%) were generated by automated cameras—fixed or mobile cameras that photograph and cite vehicles without officer involvement. The remaining 10,387 (68.8%) were issued by human officers. The officer-issued citations are the focus of this safety analysis because they reflect observed, real-time stopping behavior in the field, as opposed to camera citations which capture only specific programmatic violations (such as bus lane blocking or school zone speed) at fixed or semi-fixed monitoring points.

NYC Last-Mile Delivery Safety: Data Analysis, Methodology, and Proxy Fleet Findings (Mar. 2026), supra

The top ten officer-issued violation categories over the five-year period were, in order:

- No Standing—Day/Time Limits (2,696 citations);
- Fire Hydrant (2,183);
- No Standing—Bus Stop (2,088);
- Double Parking (1,645);
- Bike Lane (906);
- Crosswalk (357);
- No Stopping—Day/Time Limits (165);
- No Standing—Bus Lane (100);
- Safety Zone (100); and
- Double Parking—Midtown Commercial (74).

These ten categories account for more than 98% of all officer-issued citations in the dataset. The categories “No Standing” and “No Stopping” refer to NYC traffic rules that prohibit vehicles from stopping, standing, or parking in designated zones at specified times. A “standing” prohibition bars stopping except for active loading or unloading of passengers, while a “stopping” prohibition bars any vehicle halt regardless of purpose.

NYC Traffic Rules permit commercial vehicles to double-park for up to 20 minutes where no legal curbside parking space is available on the same block face and certain other conditions are met.¹¹ This legal exemption—codified at 34 RCNY §4-08(f)(1)—creates a large category of double-parking events that generate no citation, appear in no dataset, and cannot be captured in any citation-based analysis. Every legally-permitted double-parking event nonetheless forces passing vehicles to swerve into oncoming traffic, obstructs pedestrian sightlines at crosswalks, and displaces cyclists from their travel lanes. The citation record therefore systematically and necessarily understates the true safety impact of commercial delivery operations.

New York City Administrative Code §24-163 prohibits motor vehicle idling for more than three consecutive minutes (one minute within a school zone).¹² Given the shortage of legal curbside commercial loading zones space in the City, especially in dense neighborhoods, a significant proportion of vehicles stationary for three or more minutes in the areas where delivery vehicles operate are in a no-standing zone,

⁹ *DOF Parking Violations Issued FY2021–FY2025, NYC Open Data (Socrata API query); NYC Open Data, DOEE Idling Complaints, (https://idling.nyc/individual_respondents.shtml?id=119); NYC Last-Mile Delivery Safety: Data Analysis, Methodology, and Proxy Fleet Findings (Mar. 2026) [companion report].*

¹⁰ All figures are complete for all five fiscal years.

¹¹ 34 RCNY §4-08(f)(1), available at <https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCrules/0-0-0-63770>.

¹² N.Y.C. Admin. Code §24-163, available at <https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCAadmin/0-0-0-43556>.

in front of a hydrant, at a bus stop, or double-parked. And as above, the lack of citations for the 916 plates that do appear in an idling-complaint database should therefore only be understood as vehicles for which violations were not ticketed, not vehicles that parked or idled lawfully.

4. UNDER-ENFORCEMENT: THE GAP BETWEEN VIOLATIONS AND CITATIONS

A parking citation is not a parking violation. Enforcement officers cite only a fraction of the violations they encounter, and they encounter only a fraction of the violations that occur. Published peer-reviewed studies measuring the ratio of actual parking violations to citations issued in New York City converge on a range of approximately 2% to 11%—meaning that for every citation issued, between nine and fifty-three additional violations likely went undetected or uncited.¹³ This ratio—the inverse of the “ticket rate”—is the enforcement multiplier used to estimate total actual violations from the observed citation data in Part XI.¹⁴

A rigorous NYC-specific analysis of parking enforcement rates is Benjamin Arnav and Elif Ensari’s peer-reviewed 2024 study published in the journal *Cities*.¹⁵ The researchers used AI-monitored footage from 21 NYC surveillance cameras to document illegal parking in real time, submitted 558 formal illegal parking complaints about the documented violations through the City’s 311 reporting platform, and tracked NYPD’s ticketing response. Officers issued citations in only 16 of these 558 cases—a ticket rate of 2.87%. The overall City-wide 311-complaint ticket rate they measured was 11.21%. The researchers characterized their findings as evidence of “inconsistent, and in some cases non-existent, parking enforcement in New York City.”¹⁶

The Arnav and Ensari study documented a troubling pattern in how NYPD closes 311 parking complaints: officers closed complaints in as little as 14 seconds—a time physically insufficient to travel to and assess any parking location. The researchers found that NYPD officers closed approximately one-third of all complaints in less time than the average NYPD response to a critical 911 call. Most significantly, in more than 52% of the instances where police marked a complaint as resolved, illegal parking was still visibly occurring at the time of closure, as demonstrated through the AI-monitored camera footage.¹⁷

A separate analysis by Arnav of more than 76,000 blocked bike lane complaints filed through NYC’s 311 system between 2016 and 2023 found that officers issued tickets in just 1.9% of cases.¹⁸ A 2025 field survey conducted by NYC Council Member Lincoln Restler of 3,654 illegally parked vehicles observed across 60 Downtown Brooklyn blocks found that approximately 3% of those vehicles had been issued tickets. These figures, derived from independent methodologies, converge on the same 2–3% ticket rate that anchors the conservative end of the enforcement multiplier range used in the proxy fleet analysis.¹⁹

Two peer-reviewed academic studies of parking enforcement confirm the structural dynamic that produces under-enforcement. A 2017 study by Mehdi Nourinejad and Matthew J. Roorda found that commercial carriers in dense urban environments routinely treat parking fines as a predictable operating cost, absorbing citations as overhead rather than changing routes or delivery scheduling: “The CV tickets

¹³ Benjamin Arnav & Elif Ensari, *Eye in the Sky: Harnessing AI to Monitor Police Response to Illegal Parking Complaints*, 166 CITIES 106291 (2025), <https://www.sciencedirect.com/science/article/abs/pii/S026427512500592X>; Spencer Gustafson, *New York City isn’t handing out enough parking tickets*, Council Member, PIX11 NEWS (Oct. 6, 2025), <https://pix11.com/news/local-news/new-york-city-isnt-handing-out-enough-parking-tickets-council-member/>.

¹⁴ Arnav & Ensari, *supra* note 13.

¹⁵ *Id.*

¹⁶ Benjamin Arnav & Elif Ensari, *Why Does the NYPD Ignore So Many Parking Complaints?*, VITAL CITY (Nov. 14, 2024), <https://www.vitalcitynyc.org/illegal-parking-and-failed-governance-ai-study-of-nypd-enforcement/>.

¹⁷ Arnav & Ensari, *supra* note 13.

¹⁸ Benjamin Arnav, *Cops in NYC Ticket Only 2% of Blocked Bike Lanes: Analysis*, STREETS BLOG NYC (Apr. 6, 2023), <https://nyc.streetsblog.org/2023/04/06/nypd-tickets-fewer-than-2-of-blocked-bike-lane-complaints-analysis>.

¹⁹ Gustafson, *supra* note 13.

generated \$30,516,000 for the city which the carriers are willing to pay as part of the high cost of the “last mile” in the supply chain.”²⁰ A 2020 companion study by the same research group found that the per-vehicle probability of being cited actually decreases as the number of simultaneous violators in an area increases—meaning that in dense commercial delivery corridors, high violation volume paradoxically suppresses per-violation enforcement effectiveness.²¹ Both findings explain why ticket fines at current levels are structurally incapable of deterring delivery operators: the math of enforcement probability and business cost makes non-compliance economically rational.

5. ESTIMATED TOTAL SAFETY-RELATED VIOLATIONS

Of the 10,387 officer-issued citations in the proxy fleet dataset, all fall within the 25 safety-entailed violation codes queried for this analysis—codes covering obstructed emergency vehicle access, forced conflicts for pedestrians and cyclists, blocked bus lanes and stops, and restricted sight distance at intersections. The top five officer-issued categories—No Standing—Day/Time Limits (2,696), Fire Hydrant (2,183), No Standing—Bus Stop (2,088), Double Parking (1,645), and Bike Lane (906)—account for 89% of all officer-issued citations and collectively average approximately 2,077 officer-issued citations per year for the 637-plate proxy fleet.

Each of these categories involves a vehicle position that: (1) obstructs an emergency vehicle access route (hydrant, bus stop); (2) forces a vulnerable road user—pedestrian or cyclist—into a conflict with moving traffic (bike lane, crosswalk, double parking); and/or (3) reduces sight distance at or near intersections (No Stopping—Day/Time Limits, blocking intersections).²²

Scaled to the estimated full active fleet of approximately 3,077 daily vehicles, the officer-issued citation baseline rises to approximately 10,035 per year. Applying the published NYC enforcement multipliers to that baseline produces the following range of estimates for total actual annual safety-related violations attributable to a single large operator’s NYC fleet:

At the 9× multiplier (based on Arnav & Ensari’s 11.21% City-wide ticket rate): approximately 90,313 violations per year. At the 33× multiplier (based on Restler/Arnav & Ensari’s 3%/2.87% ticket rates): approximately 331,148 violations per year. At the 53× multiplier (based on Arnav’s 1.9% bike-lane-specific ticket rate): approximately 531,844 violations per year.

These three scenarios are not equally weighted: the 33× multiplier is the median of the published empirical studies specifically calibrated to NYC parking enforcement. It is used as the primary estimate throughout this document.

These estimates represent only the ticketed-violation universe scaled upward. They do not include the additional and unquantifiable volume of *legally-permitted* double-parking events under 34 RCNY §4-08(f)(1), which generate no citation and appear in no data source, but create equivalent hazards for pedestrians, cyclists, and other motorists. As a result, the true annual safety-impact figure for delivery operations is necessarily larger than any citation database or enforcement-rate calculation can capture.²³

²⁰ Mehdi Nourinejad & Matthew J. Roorda, *Parking Enforcement Policies for Commercial Vehicles*, 102 TRANSP. RESEARCH PART A: POLICY & PRACTICE 33 (2017), <https://doi.org/10.1016/j.tra.2016.04.007>.

²¹ Mehdi Nourinejad, Amir Gandomi & Matthew J. Roorda, *Illegal Parking and Optimal Enforcement Policies with Search Friction*, 141 TRANSP. RESEARCH PART E: LOGISTICS & TRANSP. REV. 102026 (2020) (“[T]he citation probability increases with the violator dwell time but decreases with the violators arrival rate, and drivers are inclined to park illegally when their dwell time is short.”), <https://doi.org/10.1016/j.tre.2020.102026>.

²² *NYC Last-Mile Delivery Safety: Data Analysis, Methodology, and Proxy Fleet Findings* (Mar. 2026), *supra*

²³ 34 RCNY §4-08(f)(1), *supra* note 11; *NYC Last-Mile Delivery Safety: Data Analysis, Methodology, and Proxy Fleet Findings* (Mar. 2026), *supra* note 9.

6. ENFORCEMENT RESOURCE IMPLICATIONS

The NYC Department of Finance FY2025 Local Law 6 Report—the annual transparency report required under Local Law 6 of 2022 for enrolled commercial fleets—recorded 729,267 total citations to Stipulated Fine Program (SFP) participants.²⁴ The SFP is a NYC program, codified at 19 RCNY §39-03.1,²⁵ that allows enrolled commercial fleets to pay reduced fines in exchange for waiving the right to contest each citation. It was designed to reduce administrative burdens on both the City and large fleets; it was not designed as a safety program and contains no safety performance standards for enrollment or continuation, other than a requirement that 21 safety-related violation categories be paid in full. At the 33× enforcement multiplier, the estimated unticketed violation volume for enrolled SFP fleets alone is approximately 20.4 million per year—violations that occurred, caused hazards, and generated no enforcement response.

The current NYC Traffic Enforcement Agent (TEA) corps numbers approximately 2,155 agents.²⁶ TEAs are civilian parking enforcement personnel, distinct from NYPD officers, who issue parking and standing violations. Each TEA issued an average of 4,100 citations per year. That figure is derived by dividing the non-automated citations by the number of TEA agents, producing the average work rate for an agent.

Based on FY2025 data, there were 1,246,820 non-automated commercial plate citations in FY2025 (camera-issued violations—camera codes 5, 7, 12, 15, 36, 43, and 57 account for 261,299 commercial violations) and so each TEA issues an average of approximately 579 citations per year, about one-seventh of their ticketing workload.

Closing the enforcement gap for commercial plates City-wide at the 33× multiplier would require the City hiring a dedicated commercial fleet ticketing army of approximately 9,731 additional TEAs; each ticketing only commercial vehicles at 4,100 or so per year, to close the gap (1,246,820 x 33 = 41,145,060). Based on their salaries (approximately \$80,000 with benefits), this would cost the City in the ballpark of three quarters of a billion dollars.

This arithmetic is dispositive: ticket-based enforcement cannot solve the problem because the violation volume is irreducible through staffing, on top of the fact that ticketing does not seem to change behavior in the first place. The practical implication is that reducing safety violations from commercial delivery operations requires structural changes to safety requirements at the front end, not additional enforcement personnel on the back end.

In FY2024, the SFP recorded 682,999 violations issued to enrolled participants, with total fines of \$60,658,155—reduced by approximately \$14.6 million through the SFP discount structure, a 24% reduction below the standard fine schedule. This fine revenue—representing payments after discount—is what the city receives for hundreds of thousands of documented commercial vehicle violations each year. The economic structure of the program ensures that for large-volume operators, parking fines remain a predictable, pre-negotiated line item rather than a deterrent.

In FY2018, UPS and FedEx together were responsible for roughly one-quarter of all commercial parking fines in New York City, totaling \$181.5 million that year and 270,000 summonses just between those two companies. This predates Amazon’s current NYC delivery volume.²⁷ In 2018, then-Brooklyn

²⁴ NYC Department of Finance, ANNUAL REPORT OF NEW YORK CITY PARKING TICKETS AND CAMERA VIOLATIONS: FISCAL YEAR 2025 (Sept. 2025), <https://www.nyc.gov/assets/finance/downloads/pdf/25pdf/2025-local-law-6-report.pdf>.

²⁵ 19 RCNY §39-03.1, available at <https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCrules/0-0-0-146069>.

²⁶ NYC Council Finance Division, REPORT ON THE FISCAL 2025 PRELIMINARY PLAN AND THE FISCAL 2024 PRELIMINARY MAYOR’S MANAGEMENT REPORT FOR THE POLICE DEPARTMENT (Mar. 20, 2024), <https://council.nyc.gov/budget/wp-content/uploads/sites/54/2024/03/056-NYPD.pdf>, at 7.

²⁷ NYC Independent Budget Office, *How Does the City Collect Parking Fines from Delivery Companies and Other Businesses?* (Feb. 5, 2019), <https://ibo.nyc.ny.us/iboreports/delivery-parking-fines-2019.pdf>.

Borough President Eric Adams stated publicly that the SFP should not exist at all, calling double-parking “the top cause of accidents and congestion in the city.”²⁸

7. NYC CRASH DATA AND THE IMPACT OF LAST-MILE FACILITIES

The NYC Comptroller’s November 2025 report, *Fast Shipping. Slow Justice*, presents the most comprehensive analysis to date of the traffic safety impacts of last-mile delivery facility sites in New York City. After last-mile delivery facilities opened in the five boroughs, 78% of the areas immediately surrounding those facilities saw increases in injury-causing crashes. Within a half-mile radius of new facilities, injuries from crashes rose by an average of 16%. Truck-related crashes in those areas increased by 146%, and injury crashes specifically involving trucks rose by 137%.

In Maspeth, Queens—a neighborhood with a high concentration of last-mile facilities—crashes near two major FedEx and Amazon warehouses rose by 53% and 48% respectively following facility opening. Maspeth is also an officially designated Environmental Justice area, with a high proportion of lower-income residents and residents of color, who are subjected to higher levels of air pollution likely tied to truck congestion and industrial activity.²⁹

In calendar year 2023, NYPD-reported crashes across the five boroughs resulted in: 5,965 pedestrian injuries and 67 pedestrian fatalities; 3,459 cyclist injuries; and 19 cyclist fatalities. Manhattan alone recorded 1,565 pedestrian injuries and 1,479 cyclist injuries. These aggregate figures provide the denominator against which any analysis of delivery-attributed crashes must be considered. They also establish the ongoing severity of street-level crashes in New York City as the baseline safety context for last-mile delivery operations.³⁰

For every person killed in a traffic crash in New York City, an estimated 11 are severely injured, a severity ratio that reflects the dense pedestrian environment and the frequency of high-speed conflicts between motor vehicles and vulnerable road users.³¹ Transportation Alternatives’ serious injury database found that nearly one in three New Yorkers have been injured in a traffic incident. The aggregate human cost of NYC traffic violence is therefore vastly larger than fatality counts alone suggest.³²

8. DOUBLE PARKING: SAFETY MECHANICS AND CONSEQUENCES

The safety hazards of street parking have been documented for half a century. A 1971 Highway Research Board report concluded that street parking was directly or indirectly responsible for 20% of all urban crashes in the United States, identifying five primary causal mechanisms: (1) increased fixed obstacles in the roadway; (2) disruption of traffic flow by vehicles entering and exiting parking spaces; (3)

²⁸ Gersh Kuntzman, *Delivery Companies Pressure City Hall to Let Them Keep Violating Law Without Penalty*, STREETS BLOG NYC (Aug. 20, 2018), <https://nyc.streetsblog.org/2018/08/20/delivery-companies-pressure-city-hall-to-let-them-keep-violating-law-without-penalty>.

²⁹ FAST SHIPPING. SLOW JUSTICE, *supra* note 4.

³⁰ NYC Department of Transportation, BICYCLE CRASH DATA REPORT 2023, <https://www.nyc.gov/html/dot/downloads/pdf/bicycle-crash-data-report-2023.pdf>.

³¹ Transportation Alternatives, *What Is a Serious Injury?*, SERIOUS INJURIES, MAPPED, <https://projects.transalt.org/serious-injuries> (“Nearly one in three New Yorkers have been injured in traffic violence. For every person killed in a traffic crash in New York City, another 11 are severely injured.”).

³² NYC Department of Transportation, *NYC DOT Launches Platform for New Yorkers to Report Areas Where Double-Parking and Blocked Bike and Bus Lanes Commonly Occur Due to Vehicle Loading and Unloading* (May 3, 2023) (NYC Department of Transportation (DOT) Commissioner Ydanis Rodriguez directly stated in 2023: “Double parking and blocked bike and bus lanes slow our city down and create hazards for our pedestrians and bikers.” The statement accompanied the launch of a NYC DOT public web platform inviting New Yorkers to report problem loading areas and request commercial loading zone improvements.), <https://www.nyc.gov/html/dot/html/pr2023/dot-web-platform.shtml>.

doors opening into traffic; (4) drivers and passengers exiting vehicles; and (5) reduced sight distance to pedestrians and cyclists.³³ A 2001 U.S. survey of the literature estimated that crashes associated with these mechanisms account for approximately 15% of crashes.³⁴ Both figures refer to parked vehicles in designated spaces—double-parked delivery vehicles in active traffic lanes create all five mechanisms simultaneously.

On-street parking near an intersection can obstruct the visibility of drivers, cyclists, pedestrians, and wheelchair users, directly increasing collision risk. This visibility obstruction—known as “corner parking” or “intersection sight distance” reduction—has worsened significantly as vehicles have become physically larger over the past two decades. The National Association of City Transportation Officials (NACTO) recommends removing on-street parking within 20-25 feet of intersections—a practice called “daylighting”—specifically to reduce intersection-related crashes.³⁵ A delivery van double-parked mid-block creates similar sight line obstructions for pedestrians attempting to cross between parked vehicles. “Daylighting” thus refers to the practice of keeping the area near an intersection clear of parked vehicles to improve sight lines for all users—analogue to how light passes through a window when obstructions are removed.

Double parking—stopping a vehicle in a live traffic lane alongside a legally parked vehicle or against a curb with no available space—generates a specific and documented chain of secondary hazards: (1) pedestrians are forced to step off the sidewalk and walk in an active traffic lane to reach the next available crossing point; (2) cyclists using a bike lane are forced to execute an unplanned lateral swerve from the protected lane into moving vehicle traffic; (3) following motorists must brake suddenly or execute an unanticipated lane change around the stopped vehicle; and (4) in two-way streets, double-parked vehicles reduce effective lane width, forcing oncoming traffic to encroach into the opposing lane.

A rigorous peer-reviewed study of traffic engineering countermeasures for pedestrian safety by researchers at the Insurance Institute for Highway Safety, published in the *American Journal of Public Health*, cited a finding that parked vehicles are the single strongest environmental risk factor for child pedestrian injury on residential streets, identifying parking restrictions as among the measures with the greatest potential for crash prevention (“In a case-control study of child pedestrian injuries, the number of parked vehicles was the strongest risk factor on residential streets.”)³⁶

NYC traffic rules define the applicable legal framework for double parking liability. Under 34 RCNY §4-08(f)(1), no person shall stand a vehicle on the roadway side of a vehicle stopped, standing, or parked at the curb—the definition of double parking under city rules.³⁷ A commercial vehicle operator is permitted an exception: standing alongside a curb-parked vehicle for no more than 20 minutes while actively engaged in loading or unloading, provided there is no unoccupied parking space or designated loading zone on the same side of the street within the same block, is permitted. That limited exemption does not render the act safe, does not eliminate the physical hazards documented elsewhere in this Part, and does not immunize operators from tort liability when the double-parked vehicle proximately contributes to a collision.³⁸

³³ Canmanie Teresa Ponnambalam & Birsan Donmez, *Searching for Street Parking: Effects on Driver Vehicle Control, Workload, Physiology, and Glances*, FRONT PSYCHOL. (2020), <https://pubmed.ncbi.nlm.nih.gov/33192873/>.

³⁴ *Id.*

³⁵ Michael Garber et al., *Parking and Public Health*, CURR. ENVIRON. HEALTH REP. (2024), <https://pubmed.ncbi.nlm.nih.gov/39658744/>.

³⁶ Richard A. Retting, Susan A. Ferguson & Anne T. McCartt, *A Review of Evidence-Based Traffic Engineering Measures Designed to Reduce Pedestrian-Motor Vehicle Crashes*, 93 AM. J. PUB. HEALTH 1456 (2003), <https://doi.org/10.2105/aiph.93.9.1456>.

³⁷ 34 RCNY §4-08(f)(1), available at <https://codelibrary.amlegal.com/codes/newyorkcity/latest/ NYCrules/0-0-0-63770>.

³⁸ David Meyer, *The DOT Quandary: Double-Parking Isn't Illegal — Except When It Actually Is*, STREETS BLOG NYC (May 2, 2019) (At a 2019 NYC DOT rulemaking hearing on commercial double-parking regulations, New York Trucking and Delivery Association CEO Ken Thorpe stated that proposed penalties would not reduce double-parking: “It

9. BIKE LANES: PROTECTIVE VALUE AND THE CONSEQUENCES OF OBSTRUCTION

The fundamental safety function of a protected or separated bike lane is to provide cyclists with a travel corridor physically separated from motor vehicle traffic, eliminating or substantially reducing the most dangerous conflict between cyclists and vehicles. When a delivery vehicle stops in a bike lane—legally or illegally—it eliminates that protection at the point of obstruction, forcing cyclists to merge into the adjacent motor vehicle travel lane.³⁹ This forced merge is not merely inconvenient; it is a documented crash-risk event.

A 2020 study analyzed protected bike lanes in Washington, D.C., New York City, and Portland, Oregon, and found that temporary obstacles in bike lanes—defined as any object forcing a cyclist to move out of the lane—were associated with a doubling of crash risk. The odds ratio (OR) for crash involvement at locations with bike lane obstacles was 2.23 (95% CI: 1.42–3.50), compared to unobstructed lane locations.⁴⁰

The swerve maneuver required when a cyclist encounters a vehicle stopped in a bike lane is mechanically dangerous for several reasons: (1) the cyclist must execute a rapid lateral movement that may not be visible to following cyclists or to motor vehicle drivers in the adjacent lane; (2) the maneuver typically occurs at the cyclist’s normal travel speed, reducing reaction time available to both the cyclist and adjacent motorists; (3) the maneuver brings the cyclist into the exact travel path of motor vehicles whose drivers’ attention is typically directed straight ahead, not toward the shoulder or bike lane; and (4) in many NYC bike lanes, the obstruction is only visible a few yards in advance, limiting the cyclist’s ability to signal or prepare for the maneuver. Each of these factors independently elevates crash risk; together they explain the OR 2.23 finding.

NYC DOT’s 2021 *Safe Streets for Cycling* report found that the installation of a new bike lane decreases cyclist risk of injury by over 60% after bike lanes were installed on some of the highest-risk streets.⁴¹ In Queens, the borough with the highest concentration of last-mile delivery warehouse and distribution operations, the injury reduction following protected lane installation was 40%. These figures quantify the safety investment that obstructed bike lanes undermine: protected bike lanes are more safe *because* they make obstruction, even temporary obstruction, impossible.

The NYC Comptroller’s 2024 report on micromobility found that traffic citations issued by NYPD declined 37% between 2018 and 2023, while fatalities jumped 25% over the same five-year period.⁴² The co-occurrence of declining enforcement and rising fatalities during the same period, when Vision Zero investment was also occurring, suggests that enforcement collapse partially offsets the safety gains from

can’t.”), <https://nyc.streetsblog.org/2019/05/02/the-dot-quandary-double-parking-isnt-illegal-except-when-it-actually-is>. See also NYC Independent Budget Office, *supra* note 27.

³⁹ Jessica Cicchino, et al., *Not all protected bike lanes are the same: Infrastructure and risk of cyclist collisions and falls leading to emergency department visits in three U.S. cities*, ACCIDENT ANALYSIS & PREVENTION (2020), <https://pubmed.ncbi.nlm.nih.gov/32388015/>.

⁴⁰ *Id.* (“[W]hen temporary features like construction or parked cars blocked the cyclist’s path relative to when they did not (adjusted OR = 2.23; 95 % CI = 1.46, 3.39).”)

⁴¹ NYC DOT, *SAFE STREETS FOR CYCLING: HOW STREET DESIGN AFFECTS BICYCLE SAFETY AND RIDERSHIP* (2021), <https://www.nyc.gov/html/dot/downloads/pdf/safe-streets-for-cycling.pdf>. See also Julianne Cuba, *DOT Study Shows That Bike Lanes Cut Risk of Cyclist Injury by One-Third*, STREETS BLOG NYC (Oct. 29, 2021), <https://nyc.streetsblog.org/2021/10/29/dot-study-shows-that-bike-lanes-cut-risk-of-cyclist-injury-by-one-third-yes-and>.

⁴² NYC Comptroller Brad Lander, *STREET SAFETY IN THE ERA OF MICROMOBILITY* (Oct. 2024), <https://comptroller.nyc.gov/reports/street-safety-in-the-era-of-micromobility/> (“The number of traffic citations issued by the NYPD declined by 37% between 2018 and 2023, even as fatalities jumped by 25% over the same period.”).

infrastructure investment. It also suggests that the severity of the citation-to-violation problem is even worse than contemplated in this report.

10. BUS LANES: SAFETY BENEFITS AND CONSEQUENCES OF BLOCKAGE

The Metropolitan Transit Authority’s (MTA) Automated Camera Enforcement program, operating as of 2025 on 54 bus routes carrying over 980,000 average weekday riders, frames bus lane clearance explicitly as a public safety measure: “Automated enforcement doesn’t just help bus riders. Keeping bus lanes and bus stops clear by enforcing double-parking helps keep all traffic moving and makes roads safer for all users.” The characterization of bus lane blocking as a multi-user safety issue—not merely a transit delay issue—reflects MTA’s operational experience with the conflict patterns generated by lane blockage.⁴³

11. FIRE HYDRANT OBSTRUCTION: SCALE, FATAL CONSEQUENCES, AND FIRE SCIENCE

Complaints to 311 about blocked fire hydrants in New York City have risen 157% over a six-year window. NYPD issued approximately 652,000 hydrant violation summonses in fiscal year 2024. In calendar year 2024, there were 133,585 311 complaints categorized as “blocked hydrant,” a volume representing roughly 366 complaints per day, every day of the year. Even accounting for duplicative complaints, the volume demonstrates that hydrant blocking has become a normalized daily occurrence in NYC neighborhoods with high delivery activity.⁴⁴

Longitudinal data shows the blocked-hydrant problem accelerated dramatically after 2014. Complaints grew from 11,886 in 2014 to 105,155 in 2021—a 784% increase over seven years—followed by 127,751 in 2022, 134,377 in 2023, and 134,026 in 2024. The post-2019 surge coincides precisely with the e-commerce delivery growth documented in Parts I and II. The same report also states that the number of New Yorkers driving actually decreased between 2013 and 2023, per census data. Former NYC DOT official Jon Orcutt stated: “The city has let illegal behavior by drivers slide so far that hydrant parking is essentially normal.”⁴⁵ The normalization of a behavior with potentially fatal consequences for fire victims and firefighters is the cumulative result of under-enforcement documented elsewhere in this report. These findings also mutually support the structural and chronic under-enforcement of safety-entailed parking and traffic violations involving motor vehicles that underlie the use of multipliers to determine true violation instances.

Despite the volume of blocked-hydrant complaints, enforcement has been effectively nominal. The standard fine for parking within 15 feet of a fire hydrant in New York City is \$115—a figure that has not increased in proportion to the explosion of violations or to the demonstrated costs of delay in firefighting operations. The Arnav & Ensari AI-camera study documented NYPD closing 311 blocked-hydrant

⁴³ Metropolitan Transit Authority, *Automated Camera Enforcement Program Overview* (Mar. 30, 2026), <https://www.mta.info/agency/new-york-city-transit/automated-camera-enforcement>.

⁴⁴ Bill Carey, *FDNY Warns Hydrant Blocking Is Delaying Firefighting Across City*, FIRE RESCUE 1 (Feb. 16, 2026), <https://www.firerescue1.com/fdny/fdny-warns-hydrant-blocking-is-delaying-firefighting-across-city>; Sophia Lebowitz, *FDNY to Drivers: Please Stop Parking at Hydrants*, STREETS BLOG NYC (Feb. 11, 2025), <https://nyc.streetsblog.org/2025/02/11/fdny-to-drivers-please-stop-parking-at-hydrants>.

⁴⁵ Liam Redmond, *Blocked NYC Fire Hydrant Complaints Doubled Since Pandemic*, FORBES LOS ANGELES (Feb. 17, 2025), <https://forbesla.com/exclusive-blocked-nyc-fire-hydrant-complaints-doubled-since-pandemic-as-bike-lanes-lack-of-cops-may-be-to-blame>.

complaints in as little as 14 seconds, and found that in more than 52% of complaint closures, illegal parking was still visibly occurring at the time of closure.⁴⁶ The \$115 fine is insufficient even as a deterrent business cost to delivery operators: at a 2-3% enforcement rate, the expected per-violation fine would be approximately \$2.30–\$3.45.

On February 9, 2025, a fatal fire at 8001 Ridge Boulevard in Bay Ridge, Brooklyn killed one person, and a woman and child were hospitalized in critical condition. When Fire Department of New York (FDNY) units arrived on scene, firefighters found two vehicles parked at the two closest fire hydrants to the fire building, directly blocking both access points. The delay in connecting to a water supply is documented in FDNY's post-incident public statements as a contributing factor in the response.⁴⁷

Three days later, on February 12, 2025, FDNY responded to a three-alarm fire at 2086 Anthony Avenue in the Tremont section of the Bronx. A parked car was blocking the nearest fire hydrant directly across the street from the fire building. Firefighters were forced to connect to an alternate water source and run longer hose lines to reach the fire. Two people died. FDNY Fire Commissioner Robert Tucker stated: “Seconds count in an emergency and blocking a fire hydrant is a selfish decision that can kill people, and endanger FDNY members as they work to save residents.”⁴⁸

The driver involved in the Anthony Avenue fire received a \$4,000 fine. The FDNY Chief of Operations Kevin Woods was explicit: “It comes down to every second counts.”⁴⁹

A third February 2025 incident involved a fire at a Buddhist temple in the Tremont section of the Bronx. Firefighters arrived to find a vehicle immobilized by an NYPD enforcement boot directly in front of a fire hydrant, making the hydrant inaccessible. Two people died. The presence of an NYPD boot on the blocking vehicle adds a specific irony: enforcement of a parking violation had rendered the hydrant more permanently inaccessible than an unbooted vehicle that could have been moved or driven off.⁵⁰

Residential fires can reach flashover—the point at which all combustible materials in an enclosed space simultaneously ignite, making survival for any remaining occupants or entering firefighters essentially impossible—in as little as 1.5 to 5 minutes from ignition of a free-burning fire. The National Fire Protection Association’s Guide for Fire and Explosion Investigations states that the time to flashover from an open flame can be as short as one and a half minutes.⁵¹ National Bureau of Standards residential fire tests have documented heavy flaming pouring from a full-sized doorway in less than four minutes, with average gas temperatures reaching 700°C within six minutes of ignition. The delay imposed by a blocked hydrant—typically measured in additional minutes to locate an alternate source, run extended hose lines, and establish water supply—occurs directly within this critical window.⁵²

The statutory 15-foot clearance zone around fire hydrants required by New York law exists to ensure firefighters can immediately and directly connect to the hydrant on arrival—without repositioning, tool retrieval, or alternate-source assessment. A vehicle that stops at a hydrant for two minutes to complete a

⁴⁶ Arnaf & Ensari, *supra* notes 12 and 14.

⁴⁷ NYC Fire Department, *The FDNY Takes Action Against Illegal Parking at Fire Hydrants Following Fatal Fires in the Bronx* (Feb. 28, 2025), <https://www.nyc.gov/site/fdny/news/F22825/the-fdny-takes-action-against-illegal-parking-fire-hydrants-following-fatal-fires-the-bronx->

⁴⁸ *Id.* See also Mark Prussin, *Driver fined \$4,000 for blocking Bronx fire hydrant during fatal blaze, FDNY says*, CBS NEWS (Feb. 28, 2025), <https://www.cbsnews.com/newyork/news/nyc-driver-fined-blocked-fire-hydrant-bronx/>.

⁴⁹ *Id.* See also Carey, *supra* note 44.

⁵⁰ Dan Landrigan, *After Three Fire Deaths, FDNY Asks People to Quit Blocking Hydrants*, FIRE ENGINEERING (Feb. 13, 2025), <https://www.fireengineering.com/firefighting/after-three-fire-deaths-fdny-asks-people-to-quit-blocking-hydrants/>.

⁵¹ National Fire Protection Association, NFPA 921: GUIDE FOR FIRE AND EXPLOSION INVESTIGATIONS (current ed.).

⁵² *Id.* See also *Fire Department Response Times vs. Flashover*, FIRE ENGINEERING (Feb. 1, 1999), <https://www.fireengineering.com/firefighting/fire-department-response-times-vs-flashover/>; Jason Poremba, *Flashover: Know When It's Time to Get Out*, FIRE RESCUE1 (Oct. 30, 2024), <https://www.firerescue1.com/flashover/articles/flashover-know-when-its-time-to-get-out-OxDfKjL69iJWZyCr/>.

delivery is legally indistinguishable in its obstruction from one that parks for two hours. The hazard is created at the moment of stoppage and persists for every minute the vehicle remains. The argument that “it’s just a few minutes” is refuted by the fire science: flashover is measurable in minutes. The time window within which a stopped delivery vehicle blocks access to a hydrant is potentially the exact window within which the hydrant’s prompt use would have altered a life-or-death outcome.

12. WORKFORCE TURNOVER IN THE LAST-MILE DELIVERY INDUSTRY

There is a documented problem of high turnover in trucking and delivery services in general, but this is particularly pronounced in the high-stress, high-intensity last-mile delivery industry. In the broader truckload motor carrier sector, average annualized turnover for large carriers averaged 92.7% per year from 1996 through early 2023, and 77.6% for smaller carriers.

By contrast, the less-than-truckload (LTL) sector,⁵³ where drivers have more stable route assignments, and predictable schedules, maintained an average turnover rate of only 11.8% over the same period. The LTL comparison is analytically important: it demonstrates that high turnover is not inherent to the nature of commercial driving, but is a product of specific operational and compensation structures.

This was the conclusion of industry experts interviewed for a report in *Freight Waves*: the turnover problem is not something inherent to the transportation/delivery services labor market; it is the result of structural economic choices made by the operational entities. A typical high-turnover operator favors cost-minimizing labor practices and accepts the human capital and safety costs of the resulting churn as a predictable operating expense.⁵⁴

Table 1: Documented Driver Turnover Rates by Carrier (2019–2025)

Operator / Program	Annual Turnover Rate	Source / Notes
Amazon DSP	~150% annualized (some stations: 330–440%)	GroundCloud/CNN (June 3, 2021); SalaryClear (2025); Harvard/Shift Project (Oct. 2025)
Amazon hourly employees (overall)	~150% annually	N.Y. Times, Kantor, Weise & Ashford (June 15, 2021)
FedEx Ground (ISP/CSP drivers)	30–40% annually	FreightWaves (Aug. 2023); FedEx ISP/MetroMax (Nov. 2022)
USPS City Carrier Assistants (CCAs)	54.24% (FY2015); 59.66% (FY2016); 45.8% (FY2019); 50–57% (FY2022–2024)	USPS OIG Audit Reports; USPS OIG (Apr. 2025)
Large truckload carriers (1996–2023 avg)	92.7%	FreightWaves (citing ATA data)
Less-than-truckload carriers (same period)	11.8%	FreightWaves (citing ATA data)

⁵³ “Less-than-truckload” refers to carriers that consolidate smaller shipments from multiple customers onto a single truck, typically with more stable routes. “Truckload” carriers dedicate entire trucks to a single shipper, often with long-haul point-to-point routes and high driver turnover. “Last-mile” delivery refers to the final segment of package delivery, from a sortation facility to the residential or commercial end recipient.

⁵⁴ John Kingston, *Report: Driver Shortage Claim Spurious; Fixation on Efficiency Causes Turnover*, FREIGHTWAVES (Oct. 30, 2024), <https://www.freightwaves.com/news/report-driver-shortage-claim-spurious-fixation-on-efficiency-causes-turnover> (citing American Trucking Associations data).

At one point per public reporting, industry leader Amazon’s delivery network experienced an annualized turnover rate of approximately 133–150%.⁵⁵ At one documented Georgia terminal employing approximately 550 drivers, management was required to hire and train 150-200 new drivers per month—an annualized turnover rate of 330–440%.⁵⁶ *The New York Times* separately documented that Amazon was losing approximately 3% of its hourly associates each week before the pandemic, equaling roughly 150% annually—nearly double the retail and logistics industry average at that time.⁵⁷

An October 2025 Harvard Kennedy School/Shift Project study, using survey data from more than 9,000 workers at Amazon, UPS, and FedEx, confirmed that this was not a brief trend.⁵⁸ According to that study, some 46% of drivers at the industry leader Amazon had been with the employer for less than one year, compared to just 2% of UPS drivers. Scaled to a New York City fleet of 3-4,000 daily shifts of 10 hours, that means just one company is putting 15,000-20,000 inexperienced driver hours on New York City’s streets every day.

FedEx Ground driver turnover is documented at 30-40% annually, based on reports from contractor advocates representing approximately 6,000 FedEx Ground contractors.⁵⁹ Industry data further indicates that nearly 60% of new FedEx Ground drivers leave within their first six months of starting.⁶⁰

FedEx Ground operates through an Independent Service Provider (ISP) and Contracted Service Provider (CSP) model, which interposes nominally independent contractors between the carrier and the driver workforce, limiting FedEx’s direct employer-of-record exposure while preserving operational control over delivery standards.

The United States Postal Service (USPS) has also had to confront the challenge of high turnover among first-year and pre-career delivery personnel. USPS City Carrier Assistants (CCAs), the entry-level, non-permanent delivery classification within the USPS, experienced documented annual turnover rates of CCAs of 54% in FY2019⁶¹, with rates of 55-59% for CCAs from FY2022 to FY2024.⁶²

USPS’s own analysis of this problem is instructive: its 2021 Delivering for America 10-Year Plan⁶³ identified high pre-career turnover as a key operational challenge and set a goal of reducing it by accelerating conversion of pre-career workers to career status—that is, by giving workers greater stability and on-the-job protections, the workforce would keep a higher proportion of long-tenured couriers,

⁵⁵ Matt McFarland, *Amazon thrived during the pandemic. These drivers say they paid the price*, CNN BUSINESS (Jun. 3, 2021), <https://www.cnn.com/2021/06/03/tech/amazon-dsp-delivery>.

⁵⁶ *Id.*

⁵⁷ Jodi Kantor, Karen Weise & Grace Ashford, *The Amazon That Customers Don’t See*, N.Y. TIMES (Jun. 15, 2021), <https://www.nytimes.com/2021/06/15/us/amazon-warehouse-workers.html>.

⁵⁸ Daniel Schneider, et al., *Amazon Drives Low Wages: The Unraveling of Workplace Protections for Delivery Drivers*, HARVARD KENNEDY SCHOOL/SHIFT PROJECT (Oct. 2025), <https://clje.law.harvard.edu/app/uploads/2025/10/Amazon-Drives-Low-Wages-The-Unraveling-of-Workplace-Protections-for-Delivery-Drivers.pdf>.

⁵⁹ Mark Solomon, *Former Contractor Says FedEx Ground Must Address Driver Wage Disparity with UPS*, FREIGHTWAVES (Aug. 8, 2023), <https://www.freightwaves.com/news/former-contractor-says-fedex-ground-must-address-driver-wage-disparity-with-ups>.

⁶⁰ *How to Retain FedEx Ground Drivers After Peak*. METROMAX SOLUTIONS (Nov. 3, 2022), <https://fedexisp.metromaxsolutions.com/how-to-retain-fedex-ground-drivers-after-peak/>.

⁶¹ U.S. Postal Service Office of Inspector General, EFFECTIVENESS OF THE POSTAL SERVICE’S EFFORTS TO REDUCE NON-CAREER EMPLOYEE TURNOVER (Feb. 12, 2020), <https://www.uspsoig.gov/sites/default/files/reports/2023-01/19POG001SAT000-R20.pdf>, at 1.

⁶² U.S. Postal Service Office of Inspector General, PRE-CAREER RETENTION INITIATIVES (Mar. 31, 2025), **Table 2** <https://www.uspsoig.gov/sites/default/files/reports/2025-04/24-131-r25.pdf>.

⁶³ U.S. Postal Service, DELIVERING FOR AMERICA: OUR VISION AND TEN-YEAR PLAN TO ACHIEVE FINANCIAL SUSTAINABILITY AND SERVICE EXCELLENCE (2021), https://about.usps.com/what/strategic-plans/delivering-for-america/assets/USPS_Delivering-For-America.pdf.

reducing the proportion of first-year couriers.⁶⁴ The implicit finding of that remediation strategy is that impermanence and a weak safety climate drives turnover, while stability reduces it.

The same Harvard Kennedy School/Shift Project study published in October 2025—based on survey responses from more than 9,000 workers at Amazon, UPS, and FedEx collected from 2017 through 2024—provides the most direct comparative tenure data available for major U.S. last-mile carriers. The study found that while just 2% of UPS drivers had been with their employer for less than one year, the figure was 46% at Amazon. The study further found that 60% of Amazon workers received frequent feedback on work speed from a technological device, and that more than two-thirds said Amazon monitors the quality of their work using technology—specifically technology owned by the facility operator, Amazon, not the interposed contractors.⁶⁵

The study specifically identified Amazon’s interposed contractor model as an example of a structural mechanism through which a company can simultaneously exercise detailed operational control over driver behavior while maintaining, and in some respects enforcing, high turnover of the workforce subject to that control.

A 2025 PRISMA-compliant systematic⁶⁶ review of 32 studies covering 38,682 last-mile delivery workers found that operator-imposed working conditions—specifically algorithmic management, piece-rate pay, and time pressure—were primary drivers of the stress, fatigue, and *risk-taking behavior* that leads to crashes: “This relationship between economic pressure and risk-taking has been observed and similarly characterized across various studies[.]”⁶⁷ Longer work hours were associated with higher rates of traffic violations and crashes.⁶⁸ Workers facing earnings-target pressure were documented to take greater risks in order to increase income.⁶⁹ The review found that work-related stress was directly associated with distracted driving, itself a manifestation of mental fatigue that further elevates crash likelihood. The pattern held across vehicle types; while cyclists and two-wheeled motorized vehicles were more likely to experience fatigue-related errors, “delivery workers using light commercial vehicles may be more prone to face stressors more associated with traffic congestion, occupational pressures, and long driving hours.”⁷⁰

13. JOB TENURE, DRIVER EXPERIENCE, AND OCCUPATIONAL INJURY RISK

Prefatory Note: This Part documents the causal relationship between driver inexperience and elevated injury and crash risk. The literature reviewed spans more than a century of occupational health research and includes commercial motor vehicle (CMV) crash studies specifically. The connection between the turnover rates documented above and the safety outcomes documented here is direct and quantifiable.

Injuries and accidents are closely related—often used interchangeably in the literature even though they are not synonymous strictly speaking. When the workplace is the public right-of-way, as it is for

⁶⁴ The USPS study found “not enough training” and “overwork” together accounted for 41% of “pre-career” courier concerns. *Supra*, note 62 at Fig. 4.

⁶⁵ Schneider, et al., *supra* note 58, at 2.

⁶⁶ PRISMA compliance means compliance with the Preferred Reporting Items for Systematic Review and Meta-Analysis guidelines, which requires standards be met to ensure transparency, reproducibility, and to reduce reporting bias.

⁶⁷ Sergio A. Useche, et al., *The Human Cost of Fast Deliveries: A Systematic Literature Review of Occupational Risks and Safety Outcomes in Last-Mile Delivery Workers*, 44 J. TRANSPORT & HEALTH 102133 (2025), <https://www.sciencedirect.com/science/article/pii/S2214140525001537>.

⁶⁸ *Id.*

⁶⁹ *Id.*

⁷⁰ *Id.*

drivers, *injuries* are of analytical importance because of the tight correlation with *accidents*—not only vehicle-to-vehicle (or vehicle-to-pedestrian, or vehicle-to-object) collisions, but also because of appurtenant accidents: for example, couriers exiting their vehicles into traffic and causing a safety cascade resulting in dangerous conditions, dropping parcels in traffic or bike lanes, etc. In any case, the correlation between reported *injuries* and *accidents* have been studied and tightly correlated.⁷¹

The relationship between job tenure and workplace injury rate is one of the most consistently replicated findings in occupational safety research, documented across industries, countries, and time periods spanning more than a century. Among the earliest documented records: a steel company reported in 1917 that the injury rate among employees with fewer than 30 days of job experience was 12 times the company average.⁷² Note that this predates “repetitive stress” or “prolonged exposure” type categorization—these injuries were typically accident- (or mistake-) related. Modern cohort studies using workers’ compensation claims data and multivariate statistical controls have consistently confirmed this pattern across diverse occupational settings.

The consistent cross-national replication of this finding over more than a century—from 1917 steel mills to 2025 platform delivery surveys—gives it the status of established occupational safety fact, not contested hypothesis.

Breslin and Smith’s landmark peer-reviewed 2006 study—using Ontario, Canada workers’ compensation records and controlling for age, sex, occupation, and industry—found that workers in their first month on the job were over four times more likely to file a lost-time workers’ compensation claim than workers with over one year of tenure.⁷³ Claim rates dropped sharply as experience accumulated: the rate in the second month was just over half the first-month rate, but still double the rate for workers with over a year of tenure.⁷⁴ The relationship documented in this study that more experience means lower injury risk makes this finding particularly strong from a causal inference perspective: “At any age, the claim rates decline as time on the job increases. .

A follow-on study extending this work over a full decade (1999–2008), focused on Ontario, Canada, confirmed the same pattern in every year of the ten-year period: workers with shorter job tenure consistently had higher injury risk than those with over one year of experience.⁷⁵

An international cohort study of 58,271 workers across 115,277 employment contracts from 1998 to 2003, controlling for economic sector, firm size, country of birth, and geographic area, found that workers with less than six months’ job tenure had injury risks 41% higher than workers with over two years’ tenure among those under age 30, and 22% higher among those over age 40. The increase in contingent employment across the country means that workers never achieve the safety benefits that come with increased tenures at a job: “In a context in which career fragmentation is increasing, workers find themselves more and more in the ‘high risk’ period and only individuals who are able to build their career

⁷¹ Vivek V. Khanzode, J. Maiti & P.K. Ray, *Occupational injury and accident research: A comprehensive review*, 50 SAFETY SCIENCE 1355 (2012), <https://www.sciencedirect.com/science/article/abs/pii/S0925753511003341> (“Accidents and injuries are the results of sequences of interacting events occurring in worksystems. Presence of hazard is the primary condition for occurrence of an accident/injury event. A person working in the vicinity of a hazard is exposed to risk of occupational injury.”).

⁷² F. Curtis Breslin & Peter Smith, *Trial by Fire: A Multivariate Examination of the Relation Between Job Tenure and Work Injuries*, 63 J. OCCUPATIONAL & ENVIRONMENTAL MED. 27 (2006), <https://pubmed.ncbi.nlm.nih.gov/articles/PMC2078031/>.

⁷³ *Id.* at 29.

⁷⁴ *Id.*

⁷⁵ Sara Morassaei, et al., *Examining job tenure and lost-time claim rates in Ontario, Canada, over a 10-year period, 1999-2008*, 70 J. OCCUPATIONAL & ENVIRONMENTAL MED. 3 (2013), <https://pubmed.ncbi.nlm.nih.gov/23123355/>.

with similar jobs may mitigate the higher risks thanks to their past experience. If institutions don't adopt appropriate prevention policies, injury risk is likely to increase, especially among young people."⁷⁶

Domestically, the Bureau of Labor Statistics (BLS) data shows that nearly one-third of all nonfatal occupational injuries involving time away from work in the United States were suffered by workers with less than one year of service—a substantial overrepresentation given that sub-one-year workers represent a far smaller fraction of the total workforce at any given time. Nearly one-quarter of these new-worker injury cases resulted in 31 or more days away from work, indicating serious, not trivial, injuries.⁷⁷ BLS is the primary federal statistical agency for occupational injury and illness data. Its Survey of Occupational Injuries and Illnesses (SOII) and Census of Fatal Occupational Injuries (CFOI) are the authoritative national sources for occupational safety data.

A systematic global review of occupational injury risk literature confirms the cross-national consistency of these findings: “the increased risk for injury among novice workers compared to their longer-tenured counterparts remains even after adjustment for confounders, including age, sex, and job.”⁷⁸ The review identifies inadequate work experience (less than one year) as posing high injury risk, and confirms a statistically significant correlation between work experience and nonfatal work injury after controlling for occupational position.⁷⁹

The elevated injury rates documented among new workers are in significant part the result of discrete workplace accidents. The literature identifies a consistent and well-documented causal mechanism: the increased risk for injury among novice workers compared to their longer-tenured counterparts, which persists even after adjustment for confounders including age, sex, and job, is attributable to a combination of unfamiliarity with job tasks or work environment, failure to recognize workplace hazards, ineffective or inadequate safety training, and differential exposure to more hazardous tasks at the beginning of a job. This mechanism—acute, *accident-type* injury driven by unfamiliarity—is analytically distinct from cumulative trauma disorders such as repetitive strain injury, which develop through prolonged exposure over time. If cumulative exposure were the dominant mechanism, injury rates would be expected to increase with tenure, not decrease. The steep early-tenure decline documented in the Breslin & Smith study and replicated across decades of research is the signature of accident-type injuries, not exposure injuries: newer and less experienced workers are getting hurt because they do not yet know what they are doing.

The Occupational Safety and Health Administration (OSHA), the federal agency charged with regulating workplace safety, has formally acknowledged this fact: OSHA has stated that new workers “are often not adequately trained in the potential hazards at the new job site and the measures they can take to protect themselves,”⁸⁰ and that this training gap is the primary cause of their elevated injury risk. BLS injury data consistently shows that workers with less than one year of service account for approximately one-third of all nonfatal occupational injuries involving days away from work, a proportion that has remained stable across decades.

The relevance for last-mile delivery couriers in New York City—who must navigate an urban environment involving vehicle operation and complex traffic interactions, all under time pressure—is that inadequate training and hazard unfamiliarity create a traffic and motor vehicle hazard for the public; workplace accidents are right-of-way accidents, by definition. The high-turnover operating model

⁷⁶ Antonella Bena, et al., *Job tenure and work injuries: a multivariate analysis of the relation with previous experience and differences by age*, 13 BMC PUBLIC HEALTH 869 (2013), <https://bmcpublichealth.biomedcentral.com/articles/10.1186/1471-2458-13-869>.

⁷⁷ *New workers, higher risk*, SAFETY & HEALTH MAGAZINE (May 22, 2016), <https://www.safetyandhealthmagazine.com/articles/14053-new-workers-higher-risk> (citing U.S. Bureau of Labor Statistics data).

⁷⁸ Safa Abdalla, et al., *Chapter 6: Occupation and Risk for Injuries*, INJURY PREVENTION AND ENVIRONMENTAL HEALTH (3d ed.) (2017), <https://www.ncbi.nlm.nih.gov/books/NBK525209/>.

⁷⁹ See also W. Monroe Keyserling, *Occupational injuries and work experience*, 14 JOURNAL OF SAFETY RESEARCH 1 (1983), <https://www.sciencedirect.com/science/article/abs/pii/0022437583900051>.

⁸⁰ *New workers, higher risk*, *supra* note 77 (quoting OSHA Administrator David Michaels).

documented above ensures that the workforce is perpetually concentrated in this high-risk, low-training window—not as an accident of the labor market, but as a predictable and structural consequence of how last-mile facility operators design their operations.

14. COMMERCIAL MOTOR VEHICLE DRIVERS SPECIFICALLY

The Virginia Tech Transportation Institute (VTTI) and the National Surface Transportation Safety Center for Excellence (NSTSCE) conducted the most comprehensive peer-reviewed study of commercial motor vehicle (CMV) driver experience and crash risk to date, using data from more than 9,000 CMV drivers aged 21–65. The study’s principal finding is direct: CMV driving experience is more important than age when considering crash risk.⁸¹

“The results indicate that, while both age and CMV driving experience play a role in driver risk, CMV driving experience is more important than age when considering risk. This may be especially true for older inexperienced CMV drivers (e.g., over 55 years of age with less than 1 year of CMV driving experience), who had higher crash rates and odds of being involved in a crash than their younger, inexperienced counterparts. Generally speaking, the first year of driving a CMV is riskier in terms of crash rates, crash involvement, and moving violations, regardless of age.”

“CMV” means commercial motor vehicle—in this context, any vehicle with a GVWR (gross vehicle weight rating) of 10,001 pounds or more used in commerce, which includes the delivery vans (typically GVWR 8,550–11,030 lbs) at issue in this document. So what is particularly troubling about the NSTSCE study is that a substantial number of the surveyed drivers would have had Commercial Driver’s Licenses (CDLs)—that is, they would have been required to pass a specific competency test to start their job at all. Delivery van drivers are not required to have CDLs—meaning there is even less training at the start of their job.

The safety benefit of CMV driving experience levels off at approximately ten years—meaning that drivers with ten years of experience are approximately as safe as drivers with twenty or thirty years. The steepest injury and crash risk reductions occur in the first several years of CMV driving experience.⁸² This finding has a practical implication: in a workforce where average tenure can be as low as 90 days, virtually the entire active fleet is operating in the highest-risk window identified by the research literature, with almost no drivers approaching the risk plateau that appears after approximately ten years.

15. THE TURNOVER-EXPERIENCE-ACCIDENT-INJURY CONNECTION IN LAST-MILE DELIVERY.

This part considers the rates of injury to new drivers specifically to underline the elevated accident risk entailed with a structurally high-turnover workforce; again, because the workplace is the public right-of-way, workplace “accidents” entail motor vehicle traffic and pedestrian safety risks. This includes operation of the vehicles, but also things like dooring, stepping into traffic, dropping packages in the right of way, etc.

The high-turnover structure of last-mile delivery creates a compounding safety problem: constant hiring of new workers means that a disproportionate share of the active workforce is in the highest-risk window for accidents and accident-related injuries—sub-one-year tenure—at any given time. A study by

⁸¹ Naomi J. Dunn, et al., *Commercial Motor Vehicle Driver Risk Based on Age and Experience*, NATIONAL SURFACE TRANSPORTATION SAFETY CENTER FOR EXCELLENCE (2020), <https://vtechworks.lib.vt.edu/items/a73eaf6a-03fa-4f7f-b34c-deb67a33a4aa>.

⁸² *Id.*

Pinnacol Assurance—Colorado’s largest workers’ compensation insurer—found that 93% of injury claims among interposed delivery contractor workers, specifically at Amazon, the industry leader, involved workers in their first year on the job, compared to 58% for the delivery industry as a whole and 41% for all industries combined.⁸³ This disproportionate concentration of injuries in the sub-one-year cohort is the direct and quantified consequence of the industry’s high-turnover structure: when almost all active drivers are first-year drivers, almost all injuries involve first-year drivers.

This is not correlation; it is the predictable mathematical consequence of the turnover rates documented in these findings.

A 2025 peer-reviewed study in the *Journal of Safety Research* using National Electronic Injury Surveillance System-Work (NEISS-Work) emergency department data from 2015 to 2022 found that injury rates among U.S. parcel delivery drivers trended upward during the study period, contrasting with overall U.S. industry injury rates, which trended downward over the same years.⁸⁴ Young delivery workers disproportionately experienced emergency department-treated injuries. The divergence between declining industry-wide injury rates and rising delivery driver injury rates is particularly significant: it indicates that factors specific to the last-mile sector—including high turnover, performance pressure, and vehicle use intensity—are producing safety outcomes that run counter to the general safety improvement trend across American workplaces. Again, while this study deals with *injury* rates from all sources, given that vehicle accidents form a significant component of all injuries, raising injury rates correlate to aggregate accident counts.

16. APP-PLATFORM WORKERS AND PRECARIOUS EMPLOYMENT INJURY DIFFERENTIALS AROUND THE GLOBE

A cross-sectional study of 18,317 Japanese workers published in *Industrial Health* in 2022⁸⁵ found that gig workers—defined as workers who receive job assignments through digital platforms rather than traditional employment arrangements—had a three times greater risk of minor occupational injury and an eight times greater risk of activity-limiting occupational injury relative to comparable non-gig workers, after controlling for age, sex, and occupation. The study specifically observed that gig workers “do not have their own employer” in the traditional sense: they face operational hazards through platform companies that exercise detailed control over their work while formally disclaiming an employment relationship. “Activity-limiting injury” is a standardized measure referring to an injury serious enough to prevent the worker from performing normal activities for at least one day—roughly equivalent to a lost-time injury in U.S. workers’ compensation terminology.

Research on food and parcel delivery platform workers in the United Kingdom found highly elevated rates of unsafe behavior among workers who attributed the behavior to platform-imposed time pressure and performance incentives: 50% admitted to speeding; 33% had driven through a red light; 42% had been involved in a collision (10% with injury); 40% reported that the platform app was distracting while riding; and 67% reported that their platform employer did not suggest taking rest breaks. The researchers concluded that this work was time-pressured, often involving high physical and mental workloads and a distracting

⁸³ Aldo Svaldi, *Amazon Delivery Drivers Have High Injury Rates in Colorado*, DENVER POST (Dec. 10, 2020), <https://www.denverpost.com/2020/12/10/colorado-amazon-delivery-drivers-injuries-pnnacol/> (citing Pinnacol Assurance data).

⁸⁴ Evan Iacobucci, et al., *Trends in Occupational Injuries Among U.S. Parcel Delivery Workers*, 92 JOURNAL OF SAFETY RESEARCH 148 (2025), <https://pmc.ncbi.nlm.nih.gov/articles/PMC11850030/>.

⁸⁵ Yusaku Morita, et al., *Relationship between occupational injury and gig work experience in Japanese workers during the COVID-19 pandemic: a cross-sectional internet survey*, 60 INDUSTRIAL HEALTH 360 (2022), <https://pubmed.ncbi.nlm.nih.gov/35545553/>.

work interface which incentivized them to go out in high-risk situations.⁸⁶ These studies in Japan and in the UK mirror the increased injury risk that is inherent in app-based work and in precarious employment models.

17. DELIVERY DRIVER FATALITY RATES VS. OTHER OCCUPATIONS

Driver/sales workers and truck drivers—the BLS occupational classification most closely corresponding to last-mile parcel delivery workers—sustained fatal occupational injury rates of 26.8 per 100,000 full-time equivalent workers in 2019, 25.8 in 2020, and 28.8 in 2021. Against an all-worker fatality rate that ranged from 3.4 to 3.6 per 100,000 FTE over that same period, these figures represent roughly seven to eight times the national average. The 2021 rate of 28.8 also more than doubled the construction and extraction occupational group rate of 12.3 per 100,000 FTE—itsself among the most hazardous broad occupation categories in the country. Reporting on 2019 data, BLS noted that “nearly 1 out of every 5 fatally injured workers was employed as a driver/sales worker or truck driver.”⁸⁷

18. WORKER INJURY RATES AT NYC LAST-MILE FACILITIES

Between 2022 and 2024, 38 of 50 last-mile delivery facilities in New York City—spanning Amazon, FedEx, UPS, DHL, and other operators—reported injuries to OSHA totaling more than 2,000 documented injuries, averaging 678 per year across the 50-facility set. Injury rates per 100 full-time equivalent employees at NYC last-mile facilities are more than triple the national average for all private employers: 8.3 injuries per 100 employees, compared to 2.4 per 100 nationally.⁸⁸

These figures are drawn from mandatory OSHA 300A injury and illness records, which all covered employers with more than ten employees are required to complete. They represent the floor of actual injuries—OSHA records document only injuries that satisfy specific recordability thresholds (medical treatment beyond first aid, days away from work, restricted duty, or a specific diagnosis), and underreporting of occupational injuries is well-documented in the research literature.

Interposed delivery contractors operating under the industry-leading e-commerce platform arrangement reported a total recordable injury rate (TRIR) of 9.2 per 100 full-time equivalent employees in 2023 and 2024, along with a Days Away, Restricted, or Transferred (DART) rate of 8.1—exceeding the injury rates of the broader last-mile and courier industries and representing more than triple the national private employer average of 2.4 per 100.⁸⁹ A 2025 peer-reviewed study using NEISS-Work emergency department surveillance data independently confirmed that delivery driver injury rates trended upward from 2015 to 2022—in direct contrast to the downward trend in overall U.S. industry injury rates over the same period, with rates among couriers and messengers converging toward a position substantially above the national average.⁹⁰

⁸⁶ Nicola Christie & Heather Ward, *The emerging issues for management of occupational road risk in a changing economy: A survey of gig economy drivers, riders and their managers*, UCL CENTRE FOR TRANSPORT STUDIES (2018), <https://www.fors-online.org.uk/cms/wp-content/uploads/2018/10/Road-safety-and-the-gig-economy-report.docx.pdf>.

⁸⁷ U.S. Bureau of Labor Statistics, *National Census of Fatal Occupational Injuries in 2019*, USDL-20-2265, Table 5 (Dec. 16, 2020), https://www.bls.gov/news.release/archives/cfoi_12162020.htm; U.S. Bureau of Labor Statistics, *National Census of Fatal Occupational Injuries in 2020*, USDL-21-2182, Table 5 (Dec. 16, 2021), https://www.bls.gov/news.release/archives/cfoi_12162021.htm; U.S. Bureau of Labor Statistics, *National Census of Fatal Occupational Injuries in 2021*, USDL-22-2309, Table 4 (Dec. 16, 2022), https://www.bls.gov/news.release/archives/cfoi_12162022.htm.

⁸⁸ FAST SHIPPING.SLOW JUSTICE, *supra* note 4.

⁸⁹ *Id.*

⁹⁰ Iacobucci, et al., *supra* note 84, at 148-49.

Across virtually all sectors of the U.S. economy, occupational injury rates have declined over the past two decades due to improved safety regulation, better technology, and worker protections. The last-mile delivery sector is moving in the opposite direction—producing more injuries per worker, per year, as the industry grows. The structural causes identified in earlier findings—high turnover and workforce inexperience—combine with the operational causes identified below—algorithmic delivery pressure and fleet condition—to produce this outcome.

19. DELIVERY OPERATIONS AND MOTOR VEHICLE SAFETY

***Prefatory Note:** This Part addresses the connection between operational details of last-mile delivery and the connection to motor vehicle safety — the documented connection between platform-controlled incentives and operational details and accident and injury rates. It is distinct but connected to worker injury findings, insofar as those workers are drivers. The two bodies of evidence share a common causal root — operator-imposed delivery speed and volume.*

Daily package deliveries in New York City grew from 1.8 million before the COVID-19 pandemic to 2.5 million in 2024.⁹¹ That volume requires a proportional number of vehicle trips, stops, and street-level interactions with pedestrians and cyclists that did not exist at the same scale a decade ago. Each delivery van completing 150-300 stops per shift executes that many individual stopping events in active traffic—each a potential conflict point with a crossing pedestrian, a cyclist in a bike lane, or a following motorist. The traffic safety risk of last-mile delivery operations is in part a direct function of volume: more stops in more locations means more conflict events, independent of the behavior of any individual driver at any given stop.

The NYC Comptroller’s November 2025 report analyzed NYPD crash data for areas within a half-mile radius of last-mile delivery facilities before and after those facilities opened. After facilities opened, 78% of nearby areas saw increases in injury-causing crashes, with injuries within the half-mile radius rising by an average of 16%. Truck-related crashes increased by 146%, and injury crashes specifically involving trucks rose by 137%. In Maspeth, Queens—a neighborhood with concentrated last-mile facility siting—crashes near two major facilities rose by 53% and 48% respectively. These are police-reported crash counts before and after a documented operational change, not inferences from injury rates.

A 2024 Journal of Safety Research study focused specifically on the light van class—the vehicle class used in last-mile delivery—found that front crash prevention systems could prevent up to 17% of crash involvements, 14% of injury crashes, and 19% of fatal crashes. The converse is analytically significant: even with full deployment of the most effective available crash-prevention technology, 81-86% of light van injury and fatal crashes would not be prevented. Advanced driver assistance systems are a partial mitigation of a persistent structural problem, not a solution to it.⁹²

A 2024 peer-reviewed study published in *Traffic Injury Prevention* surveyed 780 home delivery drivers, 430 of whom used telematics during their shifts. Telematics refers to the integrated use of GPS, accelerometers, and cellular data transmission to monitor and score driver behavior in real time—the primary technology that last-mile operators deploy as evidence of safety oversight. Most drivers, irrespective of telematics use, agreed that the time pressure of delivery work increased speed limit violations and unsafe or hazardous parking. Despite telematics generally encouraging drivers to “think twice” about speeding and other risky behaviors, drivers still experienced essentially the same pressure to speed, go through red lights, and park illegally. The explanation is structural: telematics records unsafe behavior, but also represents surveillance related to job performance (and so job security). It does not alter the conditions that made speeding or hazardous parking rational in the first place; in fact, it often reinforces those

⁹¹ FAST SHIPPING. SLOW JUSTICE, *supra* note 4.

⁹² Aimee E. Cox & Jessica B. Cicchino, *The maximum potential benefits of safety systems on light van crashes in the United States*, 91 J. SAFETY RESEARCH 366 (2024), <https://www.sciencedirect.com/science/article/pii/S0022437524001403>.

conditions through its emphasis on work speed. This finding indicates that deployment of monitoring technology does not reduce unsafe behavior, even if it increases reporting of it; in fact, it may contribute to increased driver stress and pressure in operation of motor vehicles:

“There was no significant association between drivers who used telematics and non-users when reporting a level of agreement with statements about driving over the speed limit due to time pressure of delivery work, red light running and illegal or unsafe parking. Of the total sample 80% agreed with the statement that the time pressure of delivery work could make them go over the speed limit and over 60% of drivers agreed that they often had to park illegally or unsafely.”⁹³

As documented in peer-reviewed research, the nonfatal injury rate among courier and messenger workers rose sharply from 2015 to 2022 while overall U.S. industry injury rates trended downward.⁹⁴ The transportation-incident share of nonfatal delivery driver injuries appears to have grown over this period, meaning that an already-rising injury rate is producing a disproportionately rising count of vehicle-incident injuries. The convergence of two independent evidentiary streams—police-reported crash increases near last-mile facilities, and rising vehicle-incident injuries within the delivery workforce—provides mutually reinforcing support for the conclusion that last-mile delivery operations, as currently structured, generate an increasing volume of motor vehicle safety incidents on New York City streets.

The Bureau of Labor Statistics reports that transportation incidents—meaning collisions, rollovers, and roadway events—are the leading cause of fatal occupational injuries in the United States, accounting for 38.2% of all occupational fatalities in 2024. For workers in transportation and material-moving occupations specifically, this concentration is even more pronounced. The high overall injury rates documented in these findings are therefore not solely attributable to slip-and-fall hazards, lifting injuries, or other non-vehicular causes—they are in significant measure a record of vehicle accidents. Put simply (and logically), courier injuries on a New York City street represent motor vehicle safety incidents on a city street.⁹⁵

The 2025 peer-reviewed study published in the *Journal of Safety Research* cited National Electronic Injury Surveillance System emergency department surveillance data to document injury sources among courier and messenger workers from 2015 to 2022. The study found that vehicles were the source of 16% of emergency-department-treated injuries among couriers and messengers during that period, and 13% among postal service workers. These figures represent injuries in which a vehicle was the direct mechanism of harm—i.e., injury resulted from being struck by, or colliding with, a vehicle. This is distinct from and additive to overexertion and bodily reaction injuries, which were the most common overall category but are separately attributable to lifting, loading, and physical delivery tasks rather than vehicle contact. The injury rates documented elsewhere, rising against a backdrop of declining rates in virtually every other industry, therefore capture a genuine and growing vehicle-accident problem, not merely a physical labor problem.⁹⁶

The Worker Institute at Cornell University’s School of Industrial and Labor Relations, in partnership with the Workers’ Justice Project, surveyed 500 app-based food delivery couriers operating in New York City between December 2020 and April 2021.⁹⁷ The survey found that 49% of respondents reported having been in an accident or crash while making a delivery—nearly one in two active couriers.⁹⁸ While focused on food-delivery workers, the same incentive logic applies to package delivery couriers. This NYC-specific

⁹³ Nicola Christie, et al., *Managing the Road Safety Risks of Last Mile Deliveries: Do Telematics Have a Role to Play?*, 26 TRAFFIC INJURY PREVENTION 300, 303–04 (2025), <https://doi.org/10.1080/15389588.2024.2413143>.

⁹⁴ Evan Iacobucci, et al., *Examining Injury Trends in Parcel Delivery Drivers in the United States: Challenges and Opportunities*, 66 AM. J. INDUS. MED. 441, 444–47 (2023), <https://pubmed.ncbi.nlm.nih.gov/37004194/>.

⁹⁵ U.S. Bureau of Labor Statistics, *National Census of Fatal Occupational Injuries* (2024), <https://www.bls.gov/news.release/cfoi.nr0.htm>.

⁹⁶ Iacobucci, et al., *supra* note 84.

⁹⁷ Maria Figueroa, et al., *ESSENTIAL BUT UNPROTECTED: APP-BASED FOOD COURIERS IN NEW YORK CITY* (2021), <https://hdl.handle.net/1813/113534>.

⁹⁸ *Id.* at 8.

primary survey data on delivery worker crash rates therefore applies directly to the streets covered by this analysis and provides persuasive findings.

The causal chain connecting operator-imposed production pressure to vehicle accidents to worker injuries has been specifically studied. A 2024 peer-reviewed analysis published in the *Journal of Urban Health*, using NYC Department of Consumer and Worker Protection survey data from 1,650 NYC delivery workers, examined injury prevalence among e-bike and moped delivery workers.⁹⁹ Researchers' findings highlighted workers' vulnerability to the negative consequences of algorithmic management, particularly among workers who were fully dependent upon app-based gig delivery work as their source of income. Again, the same trend is brought into sharp relief—forcing workers to move at a breakneck pace as a necessary condition of maintaining their jobs virtually guarantees their susceptibility to on-the-job injury.

A separate Kelley School of Business analysis of food delivery platform operations concluded that rapid growth in delivery services combined with shorter delivery time mandates led inevitably to more collisions, and that the structural solution therefore lies in holding the platform accountable rather than individual drivers. As the authors observed: “Overall, we find that it is optimal for the government to attack the root cause of these meal delivery violations and accidents: penalize the platform, not the drivers.” Because the platform's incentive architecture, not individual driver behavior, drives the crash rate, effectively confronting the problem requires a dismantling of the overarching structure that accepts these risks as costs of doing business. The injury statistics in Parts VI and VII are therefore not background noise—they are the downstream consequence of the operational model documented in Parts XIX and XX.¹⁰⁰

20. SAFETY CLIMATE AS A PREDICTOR OF ACCIDENTS

Prefatory Note: This Part collects peer-reviewed studies, government reports, and federal regulatory materials—all from U.S. or North American sources—addressing three related propositions: (1) that safety climate (shared perceptions of how seriously management actually prioritizes safety) is a strong causal predictor of accident and injury rates; (2) that reporting mechanisms, reporting incentives, and protection from adverse consequences for reporting are structural determinants of whether safety information reaches the people who can act on it; and (3) that the suppression of safety reporting is well documented at scale in U.S. workplaces. These findings build on findings that connect driver injury rates to accident rates—i.e., that accidents are a very high-frequency cause of injuries to light commercial vehicle drivers, and that those hazards are unlikely to be abated where the couriers cannot report the hazards to the decisionmakers, or fear to report the hazards.

The challenge facing the City of New York is that there are fleets of thousands of vehicles from a rapidly growing industry with high turnover subjecting the drivers of those vehicles to serious pressure and hazards on the public right-of-way. Most alarmingly, those drivers have no substantive way of addressing those hazards. Their putative employer has no control over the cause of the hazards (work speed and volume, among other things), and therefore there is no entity the driver can effectively appeal to in order to address safety concerns. The interposed contractors have no independent latitude or meaningful way to correct the hazardous conditions; they are at the whim of the last-mile facility operator, who can terminate them essentially at will, leaving them loaded with debt.

In such a scenario, what is the safety climate for the drivers? Meaning, will the drivers be able to report the hazards they face as a result of high speeds and volumes? Will they be willing to self-report injuries, fatigue, or illness that will inevitably impair their driving? Is their putative employer—the only entity against which they have redress—going to encourage responsible pacing when their entire business relies on hitting extraordinarily high quotas that are unilaterally set by the last-mile facility operator? As

⁹⁹ Zoey Laskaris, et al., *A Price Too High: Injury and Assault Among Delivery Gig Workers in New York City*, 101 J. URBAN HEALTH 439, 440–42 (2024), <https://doi.org/10.1007/s11524-024-00873-9>.

¹⁰⁰ Wenchang Zhang, et al., *Reducing Traffic Incidents in Meal Deliveries: Penalize the Platform or Its Independent Drivers?*, Kelley School of Business Research Paper No. 2022-09, at 3 (rev. Mar. 2026), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4231746.

this Part will show, the “safety climate” of frictionless reporting, worker incentives, fear of adverse consequences, and high-quality exchange with decisionmakers are key drivers of safety outcomes—not only injuries, but accidents specifically. The last-mile delivery model that has taken root and is expanding across New York City is designed specifically to eliminate any safety climate by interposing contractors between the ultimate decisionmakers and the people exposed to (and causing) the motor vehicle safety problems on City streets.

The competition between productivity and safety and its effect on safety outcomes has been explicitly studied in the context of trucking and deliveries, where time holds a special weight (i.e., because deliveries need to be made in a timely manner). A study of 5,534 commercial truck drivers across eight U.S. companies developed and validated a safety climate scale built specifically around the competition between safety and production demands.¹⁰¹ This included whether management prioritizes on-time delivery over driver safety, whether supervisors push drivers to keep moving when they report fatigue, and whether companies give drivers enough time to deliver safely. Scores on that scale predicted actual road injuries, measured in lost working days, across the 5,534 drivers for whom injury data were available, at a statistical confidence level exceeding 99%.¹⁰² The study concluded that “safety climate can be a strong indicator of safe driving behavior and objective safety outcomes in the trucking industry.”¹⁰³

Group-level safety climate is among the strongest organizational predictors of workplace accidents and injuries, according to a meta-analysis of 90 primary studies drawn from U.S.-based peer literature conducted by researchers at the University of Arizona, California State University (Fresno), Oklahoma State University, and Tulane University. The analysis examined both person-level factors (safety knowledge, motivation) and situational factors (safety climate) as predictors of accident and injury outcomes. While individual knowledge and motivation best predicted whether someone followed safety procedures, it was the group-level safety climate—the shared sense of whether management backs up its safety commitments with actual practice—that most strongly predicted whether accidents and injuries actually occurred.¹⁰⁴

A U.S. Government Accountability Office (GAO) study found that rate-based incentive programs where team bonuses can be jeopardized by high accident rates are a key driver to under-reporting of injuries. This is relevant because interposed contractors are often punished for their accident rates by losing territory or even having their contract terminated, which could jeopardize the jobs of an entire fleet. This creates a strong incentive not to report accidents.

The GAO audit of OSHA’s recordkeeping verification program, based on surveys of occupational health practitioners nationwide and interviews with OSHA inspectors, BLS officials, employer representatives, and researchers, confirmed that the mechanism through which incentive programs suppress reporting is not abstract—it operates through direct pressure on the health professionals who treat injured workers, and through workers’ own reluctance to jeopardize team bonuses. “[M]any factors affect the accuracy of employers’ injury and illness data, including disincentives that may discourage workers from reporting work-related injuries and illnesses to their employers and disincentives that may discourage employers from recording them. For example, workers may not report a work-related injury or illness

¹⁰¹ Yueng-hsiang Huang, et al., *Development and Validation of Safety Climate Scales for Lone Workers Using Truck Drivers as Exemplar*, 17 *TRANSP. RESEARCH PART F: TRAFFIC PSYCHOL. & BEHAVIOUR* 5 (2013), <https://www.sciencedirect.com/science/article/pii/S1369847812000824>.

¹⁰² “One notable advantage of using the road injury variable is that it can convey comprehensive information about safety outcomes unlike simple accident or injury frequency, which does not take into account the severity, fatality, or overall cost of incidents.” *Id.* at 7.

¹⁰³ *Id.* at 15.

¹⁰⁴ Michael S. Christian, et al., *Workplace Safety: A Meta-Analysis of the Roles of Person and Situation Factors*, 94 *J. APPLIED PSYCHOL.* 1103 (2009), <https://pubmed.ncbi.nlm.nih.gov/19702360/>.

because they fear job loss or other disciplinary action, or fear jeopardizing rewards based on having low injury and illness rates.”¹⁰⁵

U.S. occupational injury surveillance systematically undercounts actual injuries at every level of documentation (e.g., employer logs, workers’ compensation, physician reporting) when workers face adverse consequences at each step while institutional enforcement mechanisms are weak. A foundational paper from the University of Massachusetts Lowell, applying a multi-filter model to trace the loss of occupational injury cases across all U.S. surveillance systems, showed that fear of job loss, retaliatory discipline, and employer-controlled access to medical care each act as discrete “filters” that remove cases before they reach any official record.¹⁰⁶ “Empirical findings indicate that workers repeatedly risk adverse consequences for attempting to complete these steps, while systems for ensuring their completion are weak or absent.”¹⁰⁷ The problem is clear: the barriers to hazard reporting decrease actual reporting, and a decrease in reporting naturally results in no correction of the hazards.

OSHA’s 2016 amendment to 29 C.F.R. § 1904.35 confirms that the safety climate interferes with the ability of a company to *correct* hazards—confirming the problem of friction between reporting and correction. One of the policies seen as possibly deterring reporting (and thus correction) was a rate-based incentive program under which reporting an injury could cost the employee or team a reward. The logic is obvious: where complaining about hazardous conditions can not only endanger a job, but even endanger a personal or collective benefit (like better routes or more work), it works against reporting, which in turn works against safety. “Incentive programs that discourage employees from reporting their injuries are problematic,” because they amount to discrimination against the employee for reporting an injury.¹⁰⁸

The findings about safety climate between the people who encounter the hazards and are harmed by them, and the decisionmakers able to abate them, are widely studied and understood in the field. A field study at a U.S. manufacturing facility by David Hofmann and Frederick Morgeson is foundational in this regard.¹⁰⁹ The researchers found that workers in high-quality exchange relationships with supervisors were significantly more likely to raise safety concerns, and that this communication channel, *not formal policy compliance*, was the mechanism through which organizational support translated into fewer accidents. The study established a foundational exchange-theory model of safety communication in the United States and has been widely cited and replicated in other industries. Hofmann and Morgeson’s model for example was applied and confirmed in 2010 by researchers looking at railway workers.¹¹⁰ The common throughline of these studies is clear and commonsense: when workers are empowered to raise safety issues in real time, without fear of retaliation or retribution, safety outcomes improve.

¹⁰⁵ U.S. Government Accountability Office, *Workplace Safety and Health: Enhancing OSHA’s Records Audit Process Could Improve the Accuracy of Worker Injury and Illness Data*, GAO-10-10 (Oct. 15, 2009). <https://www.gao.gov/products/gao-10-10>.

¹⁰⁶ Lenore S. Azaroff, Charles Levenstein & David H. Wegman, *Occupational Injury and Illness Surveillance: Conceptual Filters Explain Underreporting*, 92 AM. J. PUB. HEALTH 1421 (2002), <https://pmc.ncbi.nlm.nih.gov/articles/PMC1447253/>.

¹⁰⁷ *Id.*

¹⁰⁸ 29 C.F.R. § 1904.35(b)(1)(i), (iv). See also OSHA, *Memorandum from Deputy Assistant Secretary on Employer Safety Incentive and Disincentive Policies and Practices* (Mar. 12, 2012), <https://www.osha.gov/laws-regs/standardinterpretations/2012-03-12-0>.

¹⁰⁹ David A. Hofmann & Frederick P. Morgeson, *Safety-Related Behavior as a Social Exchange: The Role of Perceived Organizational Support and Leader-Member Exchange*, 84 J. APPLIED PSYCHOL. 286 (1999), <https://psycnet.apa.org/record/1999-13895-012>.

¹¹⁰ Lisa M. Kath, Karen M. Marks & Joyce Ranney, *Safety climate dimensions, leader-member exchange, and organizational support as predictors of upward safety communication in a sample of rail industry workers*, 48 SAFETY SCIENCE 64 (2010), <https://www.sciencedirect.com/science/article/abs/pii/S0925753510000287> (identifying the dominant factor predicting upward safety communication as perceived management attitudes toward safety, followed by job demands interfering with safety and then leader-member exchange.)

21. LAST-MILE FACILITY OPERATOR CONTROL ARCHITECTURE & ITS SPREAD

The industry leader in this model, Amazon, uses the Amazon Delivery App (ADA), commonly called “Rabbit” by drivers, to direct contracted couriers’ work in four key respects:

(1) Package loading—the ADA specifies the exact number of packages assigned to the driver’s route, cross-referenced against a zone-coded manifest scanned via barcode reader

(2) Route sequencing—all stops are sequenced by Amazon’s proprietary machine-learning routing algorithm, not by the driver or interposed delivery contractor;

(3) Delivery windows—time windows are assigned to individual stops and the driver’s progress is monitored in real time; and (4) Break enforcement—Amazon’s mandated break structure (two 15-minute rest breaks and one 30-minute meal break) is built into the route timeline. The ADA controls the pace, sequence, and timing of the entire shift.¹¹¹

The Mentor DSP app—developed by eDriving LLC and required by Amazon to run on a separate device during every shift—scores driver behavior in real time using GPS, accelerometer, and on-board diagnostic (OBD) data,¹¹² collecting and analyzing speeding, acceleration, braking, cornering, and phone distraction events to generate a daily FICO Safe Driving Score.¹¹³ Scored behaviors include harsh acceleration, severe braking, harsh cornering, speeding events, a “Scorecard Speeding Event” (SSE) (a proprietary threshold triggered when a driver exceeds the posted speed limit by 15 mph for more than 5 consecutive seconds), and distraction events (phone screen activity while the vehicle is in motion).¹¹⁴ The Mentor app also logs attempts to disable location tracking or enter low-power mode, meaning efforts to limit surveillance are themselves flagged and reported.¹¹⁵

The facility operator—not the interposed delivery contractor—sets all scoring thresholds and targets. The facility operator’s weekly scorecard system directly ties interposed delivery contractor performance ratings, and therefore their compensation and route access, to Mentor scores aggregated across the contractor’s driver fleet. Contractors ranked “Fantastic” receive an additional \$8,000 per week in compensation, while those ranked “Fantastic Plus” receive \$15,000 or more per week—and all ratings are determined in part by Mentor-derived safe driving metrics.¹¹⁶ Poor Mentor scores across a contractor’s driver workforce can drag down the contractor’s overall ranking, jeopardizing access to optimal delivery routes, bonuses, and other program benefits.¹¹⁷

Amazon’s own Ground Transportation Privacy Notice acknowledges that Amazon, not the interposed delivery contractor, is the party that collects and processes driver data, including: GPS coordinates and location data updated in real time; biometric facial geometry scans for driver identity verification; video

¹¹¹ Beryl Tomay, *5 ways Amazon is innovating to improve the experience of delivery drivers*, AMAZON NEWS (Nov. 3, 2025), <https://www.aboutamazon.com/news/transportation/innovating-the-amazon-driver-experience>; *Everything you need to know about Amazon’s Delivery Service Partner (DSP) program*, AMAZON NEWS (Oct. 28, 2024), <https://www.aboutamazon.com/news/policy-news-views/amazon-dsp-program-update>.

¹¹² OBD refers to a vehicle’s self-diagnostic data port that provides access to engine, transmission, and brake system data.

¹¹³ Mentor by eDriving LLC, *Mentor Product FAQs* (last visited Mar. 2026), https://www.munichre.com/content/dam/munichre/contentlounge/website-pieces/documents/Mentor_FAQs.pdf/jcr_content/renditions/original.media_file.download_attachment.file/Mentor_FAQs.pdf; eDriving LLC, *Mentor DSP by eDriving*, Apple App Store (app ver. 2.19, last updated Apr. 2025), <https://apps.apple.com/us/app/mentor-dsp-by-edriving/id1357411961>.

¹¹⁴ *Id.*

¹¹⁵ *Id.*

¹¹⁶ *How Are Amazon DSPs Paid?*, ROUTE CONSULTANT (last updated Jun. 2025), <https://routeconsultant.com/industry-insights/how-are-amazon-dsp-paid>. See also Sample Amazon DSP Delivery Excellence Performance Scorecard from ZULT at DPX5 (2021), https://myazdsp.com/wp-content/uploads/2021/01/US_ZULT_DPX5_Week1_2021_DSPScorecard.pdf (showing various rating categories and components of those ratings)

¹¹⁷ Lauren Feiner, *Amazon Uses an App Called Mentor to Track and Discipline Delivery Drivers*, CNBC (Feb. 12, 2021), <https://www.cnbc.com/2021/02/12/amazon-mentor-app-tracks-and-disciplines-delivery-drivers.html>.

recordings from interior-facing and exterior-facing vehicle cameras installed in DSP vehicles; audio recordings captured through in-vehicle monitoring systems; drug and alcohol testing information; and inference data about potentially unsafe driving behaviors. Amazon’s role as the direct data controller—not an intermediary processor—is inconsistent with the legal characterization of Amazon as a non-employer with no employment relationship with contracted couriers.¹¹⁸

The Harvard Kennedy School/Shift Project study from October 2025 quantified the practical experience of Amazon’s technological control: 60% of surveyed Amazon workers reported receiving frequent feedback on their work speed from a technological device, and more than two-thirds said Amazon monitors the quality of their work through technology. More than one in four Amazon drivers reported going hungry because they could not afford adequate food within the prior month; 33% reported being unable to cover utility bills.¹¹⁹ The combination of intensive algorithmic control and economic insecurity characteristic of the interposed delivery contractor workforce directly implicates the safety risk findings in discussed above: drivers under stress, who cannot afford to be sent home early or lose their job, have strong incentives to maintain pace, even when safety requires slowing down.

The Human Rights Watch report *The Gig Trap*, based on interviews with 95 workers across 13 states and a survey of 127 Texas workers, examined data collection and algorithmic control practices at seven platforms—Amazon Flex, DoorDash, Instacart, Uber, Lyft, Shipt, and Favor. The report found that all seven platforms unilaterally set pay rates and use algorithmic systems with opaque rules to assign jobs. The report provides cross-platform documentation that operators’ control architecture is increasingly industry-standard and not an aberration.¹²⁰

UPS’s On-Road Integrated Optimization and Navigation (ORION) route-optimization system and Delivery Information Acquisition Device (DIAD) delivery scanner are the direct legacy-carrier parallel to the ADA. UPS drivers make an average of 125 stops each day; UPSNav, ORION’s turn-by-turn navigation layer, was built specifically for that stop-density workload. New and regional last-mile carriers are explicitly competing on app-based driver control: industry reporting notes that new non-traditional last-mile parcel delivery companies use non-employee delivery agents and self-developed apps to match agents to available parcels. Another industry player, OnTrac, uses its OnRoute app, which includes includes barcode scanning, automated route optimization, turn-by-turn navigation, virtual proof of delivery, and continuous background GPS tracking.¹²¹ In other words, the industry convergence on algorithmic control of delivery workers is accelerating.¹²²

22. VEHICLE INSPECTION, FLEET SAFETY, AND VEHICLE MAINTENANCE COSTS.

Prefatory Note: *This Part focuses on the generally known costs of common mechanical problems of common delivery vans. The common safety-related mechanical problems of these vehicles and their related costs are important because interposed contractors are inherently under-capitalized and can lose revenue for each vehicle taken out of circulation; so frequent repairs or preventative care hit them twice over. This is a structural issue with the interposed contractor model that implicated vehicle safety significantly.*

¹¹⁸ Amazon Ground Transportation Privacy Notice, AMAZON RELAY (last updated Jul. 31, 2023), <https://relay.amazon.com/notices/gtpn> (defining “Transportation Company” to include DSPs and Amazon Freight Partners, or AFPs, and stating that camera technology provisions apply “if you provide Services through a DSP or AFP”).

¹¹⁹ Schneider, et al., *supra* note 58, at 2.

¹²⁰ Human Rights Watch, THE GIG TRAP: ALGORITHMIC WAGE AND LABOR EXPLOITATION IN PLATFORM WORK IN THE U.S. (May 2025), <https://www.hrw.org/report/2025/05/12/the-gig-trap/algorithmic-wage-and-labor-exploitation-in-platform-work-in-the-us>.

¹²¹ OnTrac OnRoute App, APPLE APP STORE, <https://apps.apple.com/us/app/ontrac-onroute/id6503946887>.

¹²² UPS Deploys Purpose-Built Navigation for UPS Service Personnel, UPS NEWSROOM (Dec. 4, 2018), <https://about.ups.com/us/en/newsroom/press-releases/innovation-driven/ups-deploys-purpose-built-navigation-for-ups-service-personnel.html>; Eric Kulisch, *Independent Parcel Carriers Continue Network, Tech Investments*, FREIGHT WAVES (Oct. 23, 2025), <https://www.freightwaves.com/news/independent-parcel-carriers-continue-network-tech-investments>.

The structural mechanism through which known vehicle defects are converted into on-road safety hazards is documented directly in the CNBC reporting: “If delivery companies take a van off the road, they risk forfeiting valuable package routes and drivers may lose a shift. Dropping a route not only hurts DSPs financially, but it can also affect the score assigned to them by Amazon. If an interposed delivery contractor’s ranking falls, it may lose out on bonus payments or receive worse routes in the future.” This passage describes a financial incentive structure that systematically discourages interposed contractors from complying with their own safety manual’s out-of-service requirements.¹²³

The vehicle maintenance cost structure imposed on interposed delivery contractors creates a documented financial incentive to defer safety-critical repairs. DSPs, for example, lease vans from Amazon-affiliated leasing companies for approximately \$500 per month, but Amazon retains the right to call vehicles back for inspection, redeploy them to another contractor, or retire them at any time. When vans are transferred, contractors are billed for repairs assessed as beyond normal wear and tear—bills that could reach \$20,000 or more per vehicle and amount to costs capable of wiping out the profit margins of small operators.¹²⁴ Contractors told Bloomberg they were canceling automatic payment authorizations to protect themselves from what they characterized as overcharging.¹²⁵ By October 2025, Bloomberg reported that a significant number of DSPs were exiting the program entirely because rising costs for insurance and vehicle maintenance had made profitability impossible—with one Texas operator describing a business model in which he “earned significantly less as I got more seasoned, which is the most upside-down business I’ve ever heard of.”¹²⁶

The financial pressure this creates on remaining operators is directly safety-relevant: a contractor operating at thin or negative margins has a structural incentive not to take a revenue-generating vehicle out of service for repairs, precisely the incentive structure that the CNBC reporting in the preceding findings documents playing out in actual pre-trip inspection bypass.¹²⁷

Last-mile delivery vans operating in dense urban environments are subject to a duty cycle that is categorically more severe than the conditions for which standard manufacturer maintenance intervals are designed. The relevant parameters include: 100-250 stops per 10-hour shift; engine start-stop cycles at each stop; brake application at every stop; door opening and closing 100-250 times per shift; and extended idling during package retrieval. Mileage is an inadequate proxy for wear in urban delivery applications because “engine hours”—driven by constant idling, start-stop cycles, and driver ingress-egress—may reflect far greater component wear than the odometer suggests.¹²⁸

Annual maintenance cost data from RepairPal—a database aggregating real-world repair invoice data across millions of vehicles—documents the following costs and reliability profiles for the major last-mile delivery platforms: Mercedes-Benz Sprinter 2500: \$1,778/year¹²⁹; Ram ProMaster 1500: \$1,072/year (reliability rating 2.0/5.0, ranked 17th out of 21 commercial vans in RepairPal’s database)¹³⁰; Ram

¹²³ Annie Palmer, *Amazon delivery companies routinely tell drivers to bypass safety inspections*, CNBC (Jul. 30, 2021), <https://www.cnbc.com/2021/07/30/amazon-dsps-tell-drivers-to-bypass-safety-inspections.html>.

¹²⁴ Spencer Soper & Matt Day, *Amazon at Odds With Delivery Partners Over Van Repair Bills*, TRANSPORT TOPICS (Sept. 4, 2025), <https://www.ttnews.com/articles/amazon-van-repair-bills>.

¹²⁵ *Id.*

¹²⁶ *Id.*

¹²⁷ Spencer Soper, *Amazon Delivery Firms Are Bailing Amid Rising Costs, Meager Profit*, INSURANCE JOURNAL (Oct. 20, 2025), <https://www.insurancejournal.com/news/southcentral/2025/10/20/844455.htm>.

¹²⁸ “Duty cycle” refers to the pattern of operational demands a vehicle experiences over a working period—including the frequency and severity of stops, the ambient temperature, load weight, and route characteristics. A heavier duty cycle accelerates component wear relative to standard OEM maintenance schedule assumptions. Gregg Wartgow, *Tips to Ensure Uptime on Urban Routes*, FLEET MAINTENANCE (2021), <https://www.fleetmaintenance.com/in-the-bay/diagnostic-and-repair/article/21267035/tips-to-ensure-uptime-on-urban-routes>.

¹²⁹ *Mercedes-Benz Sprinter 2500 Reliability and Maintenance Cost*, REPAIRPAL, <https://repairpal.com/mercedes-benz/sprinter-2500>.

¹³⁰ *Ram ProMaster 1500 Reliability*, REPAIRPAL, <https://repairpal.com/reliability/ram/promaster-1500>.

ProMaster 2500: \$1,147/year (reliability rating 2.0/5.0, ranked 20th out of 21 commercial vans).¹³¹ The commercial van segment average is \$963/year; the all-vehicle average is \$652/year. Both ProMaster models require unscheduled shop visits approximately twice as frequently as the segment average.

23. LIABILITY, ACCOUNTABILITY, AND SAFETY OUTCOMES

OSHA’s Multi-Employer Citation Policy establishes that the entity “best positioned to control a hazard should bear responsibility for it.”¹³² The controlling employer category covers any entity with “general supervisory authority over the worksite, including the power to correct safety and health violations itself or require others to correct them.” Control can be established by contract or by the exercise of control in practice, and a controlling employer can be cited even when none of its own employees were exposed to the hazard. Every federal circuit court has recognized OSHA’s authority to issue citations to multiple employers for the same hazardous conditions. As applied to last-mile delivery, last-mile facility operators’ authority over operations, real-time control of courier performance, and control of territory assignments, scoring, and financial incentives establish a robust factual basis for analysis under both the “creating employer” and “controlling employer” doctrines in terms of the creation of hazard.¹³³

Two peer-reviewed studies by the same Washington University research team tested the relationship between safety management programs, safety climate, and actual safety outcomes in construction—an industry whose multi-employer contractor structure closely parallels the last-mile delivery model. The 2020 study found that written safety management programs alone showed only weak correlation with workers’ actual perceived safety climate ($\beta = 0.09$, $p = 0.04$), and that the quality and content of written programs varied dramatically by employer size, with small subcontractors showing the greatest deficiencies. The 2021 companion study tested whether active upstream oversight changed this picture: workers employed by subcontractors working under general contractors with exemplary safety programs reported measurably higher safety climate scores, and subcontractors were required to adopt more safety policies and practices to work under those general contractors. The findings together establish that paper safety programs are insufficient—active participation and oversight by the entity with control over the worksite is what produces measurable safety outcomes among the workers of smaller, less-resourced subcontractors.¹³⁴

24. NEW YORK CITY'S REGULATORY AUTHORITY OVER TRAFFIC SAFETY AND LIABILITY GENERALLY

New York Vehicle and Traffic Law (VTL) §1642 grants the legislative body of any city with a population exceeding one million—which includes New York City—the power to prohibit, restrict, or regulate traffic on any highway within its jurisdiction by local law or ordinance. The statute explicitly provides that NYC’s local laws and traffic rules “shall supersede” the provisions of the VTL where inconsistent or in conflict with respect to enumerated subjects, including speed limits, stopping, and parking. NYC’s commercial vehicle double-parking rule permits commercial vehicles to stand alongside a standing vehicle or at a curb during loading or unloading of goods for up to 20 minutes where no legal

¹³¹ *Ram ProMaster 2500 Reliability*, REPAIRPAL, <https://repairpal.com/reliability/ram/promaster-2500>.

¹³² OSHA, *Compliance Directive CPL 02-00-124, Multi-Employer Citation Policy* (Dec. 10, 1999) <https://www.osha.gov/enforcement/directives/cpl-02-00-124>.

¹³³ *Id.*

¹³⁴ Ann Marie Dale, et al., *The Association Between Subcontractor Safety Management Programs and Worker Perceived Safety Climate in Commercial Construction Projects*, 74 J. SAFETY RESEARCH 279 (2020), <https://pmc.ncbi.nlm.nih.gov/articles/PMC8577185/>; Ann Marie Dale, et al., *Flow-Down of Safety from General Contractors to Subcontractors Working on Commercial Construction Projects*, 142 SAFETY SCIENCE 105353 (2021), <https://pmc.ncbi.nlm.nih.gov/articles/PMC9075183/>.

curbside parking space is available within the block.¹³⁵ This exemption does not eliminate the safety hazard that every double-parking event creates.

Tellingly, under New York tort law, a commercial vehicle operator who double-parks under the exemption and whose vehicle proximately contributes to a pedestrian injury or cyclist crash may present a question for the jury on proximate cause and reasonable care notwithstanding the regulatory permission.¹³⁶ While legal liability under various tort and negligence theories are not the focus of this report and run along different axes, it does reflect the underlying problem of an accountability gap. Requiring and standardizing safety in a high-impact industry becomes impossible when the *apparent* actor conceals the *actual* actor. The interposed contractor system was evidently designed to achieve this end specifically. Zachary B. Pyers & Kenton H. Steele, in a law review article, delve into the interposed contractor model from a liability perspective, and conclude that such programs are structurally designed to disclaim liability even though the last-mile entity exercises control over such things as training, schedules, and even discipline (citing *Gibbs v. MLK Express Servs., LLC* No. 2:18-cv-434-FtM-38MRM, 2019 U.S. Dist. LEXIS 20189 (M.D. Fla. Feb. 7, 2019)).¹³⁷

CONCLUSION

Increased reliance on e-commerce is now a virtually unavoidable aspect of daily life for many New York City residents. Yet safety protections and regulations have overwhelmingly failed to keep pace with the rapid growth of last-mile delivery services. In the absence of meaningful oversight, the delivery drivers who bring packages to our doorsteps work under unforgiving quotas that constantly force them to choose between obeying traffic laws and keeping their jobs. The pressure of making deliveries efficiently—according to timetables and metrics unilaterally dictated by last-mile facility operators—pushes drivers to engage in risky behavior that jeopardizes both their own safety and the safety of all residents sharing our public streets. The consequences can be dire and life-threatening: drivers are more likely to get into accidents that injure other motorists, pedestrians, and cyclists, decrease crosswalk accessibility and visibility, and block hydrants crucial to timely fire response. Perhaps most alarmingly, drivers lack a viable avenue to address these pressing safety issues, as the last-mile delivery industry has steadily moved towards the use of interposed contractors who act as a buffer between facility operators (corporate giants like Amazon and FedEx) and the drivers who perform their core delivery work (yet are employed, on paper, by the contractor alone). This sham structure enables facility operators to disclaim responsibility for the safety problems that stem directly from the way they operate—which is by churning through newer and less experienced drivers who are statistically more prone to accidents, and then displacing any fault for resulting accidents onto contractors who are themselves thinly capitalized. In other words, the interposed contractor model and its attendant safety risks are indicative of a system that, by design, allows operators to maximize profit while limiting liability.

Effectively curbing hazards on our City streets requires going to the root of the issue—that is, confronting the issues that have become endemic to the last-mile delivery industry, such as high turnover, unmanageable productivity quotas dictated by entities who disclaim an employment relationship with the driver subject to those quotas, intense algorithmic management, and the strategic use of contractors to dodge

¹³⁵ 34 RCNY §4-08(f)(1), available at <https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCrules/0-0-0-63770>.

¹³⁶ “The facts in each negligence action will determine whether a double-parking violation was the proximate cause of injury.” *Somersall v. New York Tel. Co.*, 74 AD2d 302, 310, reversed on other grounds 52 NY2d 157.

¹³⁷ Zachary B. Pyers & Kenton H. Steele, *A Prime Opportunity for Tort Law Developments: Liability Issues Related to Amazon’s Delivery Service Partner Program*, 50 CAP. U. L. REV. 395 (2022) (“By structuring its delivery services in this way, Amazon has been able to ensure it retains no liability for the actions of its drivers.”).

accountability. Simply trying to “ticket” unsafe driver conduct into extinction will never work, particularly given systemic underenforcement of parking regulations and the fact that many operators accept parking citations as a cost of doing business. Without an overhaul of the practices that incentivize drivers to forego safety for speed and actually penalize them for abiding by traffic laws, these issues will persist. It is therefore imperative that the City implement mechanisms to guarantee an overarching culture of safety compliance, starting with the last-mile facility operators who wield the most control over drivers’ material conditions and set the industry standard.

March 2026

NYC Last-Mile Delivery Safety

Data Analysis, Methodology, and Proxy Fleet Findings

Prepared: March 2026

Part I: E-Commerce Cohort Analysis — Charts A, B, and C	3
Summary of Findings	3
Chart A — E-Commerce Cohort vs. Legacy Fleet Citation Growth.....	3
Chart B — Outer Borough Geographic Migration.....	4
Chart C — Citations and Actual Safety Violations.....	6
“Safety-Entailed” Violations — 25-Code Definition.....	7
Emergency Access Obstruction.....	7
Lane and Intersection Obstruction.....	7
Vulnerable User Infrastructure	7
Other Travel Obstruction	7
Camera-Enforced (Automated Detection)	8
Part II: Proxy Fleet Analysis.....	9
Table 1 — Active Plates and Citations by Year.....	9
Table 2 — Citations by Violation Code by Year	9
Table 3 — Scaled Fleet: Estimated Annual Citations.....	11
Table 4 — Scaled Fleet: Estimated True Annual Violations.....	11

Part I: E-Commerce Cohort Analysis — Charts A, B, and C

Summary of Findings

What the data establishes: Safety-entailed citations to commercial delivery vans in New York City grew 120%—more than doubled—between FY2014 and FY2023, from 140,356 to 308,674—a period during which overall NYPD traffic enforcement declined 37% per the NYC Comptroller. The growth is net of a falling enforcement rate, meaning the underlying violation volume grew substantially more than the citation record alone reflects.

What the cohort analysis establishes: That growth is concentrated in the e-commerce delivery van cohort—Ford Transit, Mercedes-Benz Sprinter, Ram/Dodge ProMaster, and Rivian EDV—which grew 120% over the same period. The legacy commercial delivery fleet—Freightliner, Workhorse, International, Hino, Isuzu—declined 9%. The two cohorts moved in opposite directions, ruling out a general “more trucks on the road” explanation and identifying the growth as specific to e-commerce last-mile operations.

What the geographic data establishes: Citations in the outer boroughs grew 157% from the FY2014-2016 baseline to the FY2023-2025 current period, against Manhattan’s 31% growth. Queens alone grew 302% from FY2014 to FY2025. This pattern is consistent with the expansion of residential last-mile delivery into neighborhoods the legacy commercial fleet does not serve.

What the enforcement gap analysis establishes: Citations are a floor, not a ceiling. Enforcement rate studies find between 1.9% and 11% of observed parking violations result in a citation. On bus-lane camera corridors—the only locations where automated and officer enforcement can be directly compared—automated systems detect violations at approximately 10 times the rate of officer patrol.

Chart A — E-Commerce Cohort vs. Legacy Fleet Citation Growth

Safety-entailed parking citation records for fiscal years 2014 through 2025 were obtained by direct query of the NYC Department of Finance Parking Violations Issued datasets, available through the NYC Open Data portal (data.cityofnewyork.us), using the Socrata API. Queries were limited to commercial plates (plate type = COM) with vehicle body types of VAN or DELV, and filtered to the 25 violation codes designated as safety-entailed and defined in the final section of this Part. The e-commerce delivery cohort comprises Ford Transit, Mercedes-Benz Sprinter, Ram/Dodge ProMaster, and Rivian EDV. The legacy fleet comprises Freightliner/Fruehauf, Workhorse, International, Hino, and Isuzu. Ram and Dodge citations are combined as a single manufacturer group reflecting Stellantis’s 2009 brand separation. All figures are from complete server-side aggregation queries with no row-limit truncation. The index presents each series with FY2014 = 100.

Fiscal Year	E-Commerce Cohort	Legacy Fleet	All COM Van+Delv	E-Cohort Index (FY2014=100)	Legacy Index (FY2014=100)	Key Event
FY2014	140,356	261,748	668,553	100	100	
FY2015	190,309	389,823	881,821	135.6	148.9	

Fiscal Year	E-Commerce Cohort	Legacy Fleet	All COM Van+Delv	E-Cohort Index (FY2014=100)	Legacy Index (FY2014=100)	Key Event
FY2016	194,794	369,779	809,159	138.8	141.3	
FY2017	208,608	374,586	804,225	148.6	143.1	
FY2018	234,633	440,605	875,047	167.2	168.3	<i>DSP launch</i>
FY2019	238,308	457,099	866,661	169.8	174.6	
FY2020	245,070	397,100	782,548	174.6	151.7	<i>COVID surge</i>
FY2021	271,326	378,469	783,946	193.3	144.6	
FY2022	250,574	288,890	649,556	178.5	110.4	<i>Rivian deploys</i>
FY2023	308,674	319,789	748,362	219.9	122.2	
FY2024	235,547	229,880	553,428	167.8	87.8	
FY2025	242,080	238,064	566,646	172.5	91	
Percentage Change	E-Cohort	Legacy	All COM Van+Delv			
FY2014 → FY2025	+72.5%	-9.0%	-15.2%			
FY2014 → FY2023 (peak)	+119.9%	+22.2%	+11.9%			
FY2018 → FY2025 (post-DSP)	+3.2%	-46.0%	-35.2%			

Source: NYC Open Data, DOF Parking Violations Issued FY2014–FY2025, Socrata API. COM plates, VAN+DELV body types, 25 safety-entailed violation codes.

Chart B — Outer Borough Geographic Migration

Using the same dataset, query parameters, and make groupings as Chart A, citation counts for the e-commerce cohort were further grouped by the violation_county field, which records the borough in which each citation was issued. Borough code variants were normalized to five canonical borough names. Results were aggregated by fiscal year and borough for all 12 fiscal years. The upper section of the table presents raw annual citation counts; the lower section presents each borough's share as a percentage of that year's e-cohort total.

Fiscal Year	Manhattan	Brooklyn	Queens	Bronx	Staten Island	Outer Boros Total	Key Event
FY2014	99,368	13,621	11,204	6,540	179	31,544	

Fiscal Year	Manhattan	Brooklyn	Queens	Bronx	Staten Island	Outer Boros Total	Key Event
FY2015	125,619	15,252	14,285	9,967	186	39,690	
FY2016	129,227	15,933	14,866	8,898	254	39,951	
FY2017	140,323	27,492	24,922	13,011	1,463	66,888	
FY2018	157,127	29,901	27,548	17,569	1,365	76,383	<i>DSP launch</i>
FY2019	157,154	29,050	29,458	20,067	1,727	80,302	
FY2020	146,689	33,394	36,621	24,912	2,461	97,388	<i>COVID surge</i>
FY2021	166,169	32,810	38,990	29,819	3,253	104,872	
FY2022	144,376	31,275	46,083	25,187	3,445	105,990	<i>Rivian deploys</i>
FY2023	168,377	41,764	60,674	29,985	4,126	136,549	
FY2024	125,697	29,221	50,732	21,068	3,259	104,280	
FY2025	141,142	30,150	45,024	17,672	3,163	96,009	
% of Annual Total	Manhattan	Brooklyn	Queens	Bronx	Staten Island	Outer Boros	
FY2014	70.8%	9.7%	8%	4.7%	0.1%	22.5%	
FY2015	66%	8%	7.5%	5.2%	0.1%	20.9%	
FY2016	66.3%	8.2%	7.6%	4.6%	0.1%	20.5%	
FY2017	67.3%	13.2%	11.9%	6.2%	0.7%	32.1%	
FY2018	67%	12.7%	11.7%	7.5%	0.6%	32.6%	
FY2019	65.9%	12.2%	12.4%	8.4%	0.7%	33.7%	
FY2020	59.9%	13.6%	14.9%	10.2%	1%	39.7%	
FY2021	61.2%	12.1%	14.4%	11%	1.2%	38.7%	
FY2022	57.6%	12.5%	18.4%	10.1%	1.4%	42.3%	
FY2023	54.5%	13.5%	19.7%	9.7%	1.3%	44.2%	
FY2024	53.4%	12.4%	21.5%	8.9%	1.4%	44.3%	
FY2025	58.3%	12.5%	18.6%	7.3%	1.3%	39.7%	

Source: NYC Open Data, DOF Parking Violations Issued FY2014–FY2025, Socrata API. Upper section: raw citation counts. Lower section: borough share as percentage of annual e-cohort total.

Chart C — Citations and Actual Safety Violations

Chart C presents actual safety-entailed citations issued to the e-commerce delivery van cohort for each fiscal year from FY2014 through FY2025, alongside three estimates of the true number of safety-entailed violations occurring during the same period. The estimates are derived by applying enforcement rate multipliers from peer-reviewed and field research directly to each year’s total citation count.

9x (conservative): Arnav and Ensari (2024) measured a citywide 311-complaint ticket issuance rate of 11.21%, meaning roughly one in nine observed violations resulted in a citation.

Arnav, B. & Ensari, E., “Eye in the Sky: Harnessing AI to Monitor Police Response to Illegal Parking Complaints,” Cities (2024), DOI: 10.2139/ssrn.4974275.

33x (mid-range): Arnav and Ensari’s finding that safety-specific violations were ticketed at a rate of only 2.87% converges with a May-June 2025 field survey by Council Member Restler in Downtown Brooklyn documenting a ticket rate of approximately 3%.

PIX11/amNewYork (May–Jun 2025), <https://pix11.com/news/local-news/new-york-city-isnt-handing-out-enough-parking-tickets-council-member/>.

53x (liberal): Arnav (2023) found that NYPD tickets fewer than 1.9% of blocked bike lane complaints—the most precisely measured violation-specific enforcement rate in the published NYC literature.

<https://nyc.streetsblog.org/2023/04/06/nypd-tickets-fewer-than-2-of-blocked-bike-lane-complaints-analysis>.

The multipliers are applied to total citation counts. Automated camera systems detect violations at a substantially higher rate than officer patrol, so including camera citations in the base slightly understates the true violation count. All estimates are therefore floors, not ceilings. These figures do not include legally-permitted commercial double-parking under 34 RCNY §4-08(f)(1), which creates identical physical hazards while appearing in no enforcement dataset.

Fiscal Year	Actual Citations (E-Cohort)	9x Conservative (11.21% rate)	33x Mid-Range (2.87–3% rate)	53x Liberal (1.9% rate)	Key Event
FY2014	140,356	1,263,204	4,631,748	7,438,868	
FY2015	190,309	1,712,781	6,280,197	10,086,377	
FY2016	194,794	1,753,146	6,428,202	10,324,082	
FY2017	208,608	1,877,472	6,884,064	11,056,224	
FY2018	234,633	2,111,697	7,742,889	12,435,549	DSP launch
FY2019	238,308	2,144,772	7,864,164	12,630,324	
FY2020	245,070	2,205,630	8,087,310	12,988,710	COVID surge
FY2021	271,326	2,441,934	8,953,758	14,380,278	
FY2022	250,574	2,255,166	8,268,942	13,280,422	Rivian deploys
FY2023	308,674	2,778,066	10,186,242	16,359,722	
FY2024	235,547	2,119,923	7,773,051	12,483,991	

Fiscal Year	Actual Citations (E-Cohort)	9x Conservative (11.21% rate)	33x Mid-Range (2.87–3% rate)	53x Liberal (1.9% rate)	Key Event
FY2025	242,080	2,178,720	7,988,640	12,830,240	
FY2021–2025 Total	1,308,201	11,773,809	43,170,633	69,334,653	
Annual Average	261,640	2,354,762	8,634,127	13,866,931	

33x mid-range column (highlighted) is the primary estimate. Multiplier basis: Arnav & Ensari (2024) 2.87% safety-specific ticket rate and Restler (2025) Downtown Brooklyn field survey (~3%). 5-year summary rows cover FY2021–FY2025 only.

“Safety-Entailed” Violations — 25-Code Definition

The following 25 violation codes were queried and are designated as safety-entailed. They are used consistently in Charts A, B, and C.

Emergency Access Obstruction

- 40 — Fire Hydrant
- 67 — Pedestrian Ramp

Lane and Intersection Obstruction

- 9 — Obstructing Traffic / Intersection
- 10 — No Stopping — Day/Time Limits
- 14 — No Standing — Day/Time Limits
- 45 — Traffic Lane
- 46 — Double Parking
- 47 — Double Parking — Midtown Commercial
- 52 — Blocking Intersection
- 53 — Safety Zone
- 89 — No Standing (Exc Trucks / Garment District)

Vulnerable User Infrastructure

- 18 — No Standing — Bus Lane
- 19 — No Standing — Bus Stop
- 48 — Bike Lane
- 50 — Crosswalk
- 51 — Sidewalk

Other Travel Obstruction

- 49 — Excavation — Vehicle Obstructs Traffic
- 54 — Pickup / Discharge in Prohibited Zone

- 55 — Elevated / Divided Highway / Tunnel
- 59 — Angle Parking — Commercial Vehicle
- 98 — Obstructing Driveway

Camera-Enforced (Automated Detection)

- 5 — Bus Lane Violation
- 7 — Failure to Stop at Red Light
- 12 — Mobile Bus Lane Violation
- 36 — School Zone Speed (Camera)

Part II: Proxy Fleet Analysis

The following tables analyze parking and traffic citations issued to a proxy fleet of 1,553 license plates identified from the NYC Department of Environmental Protection idling-violation database as associated with Amazon-related entities registered in Seattle, Washington. Citations were queried from the NYC Open Data DOF Parking Violations Issued datasets for FY2021 through FY2025 using the same 25 safety-entailed violation codes defined in Part I. Of those 25 codes, 20 produced at least one citation against a proxy fleet plate. The five codes that returned zero results — 49 (Excavation), 54 (Pickup/Discharge in Prohibited Zone), 55 (Elevated/Divided Highway/Tunnel), 59 (Angle Parking — Commercial Vehicle), and 89 (No Standing — Exc. Trucks/Garment District) — are included in Table 2 for completeness and shown with “—” entries. Their absence reflects the operating pattern of a last-mile delivery fleet or a random result of the sample plates rather than any gap in the query.

Table 1 — Active Plates and Citations by Year

Fiscal Year	Active Plates (Cited)	% of 1,553-Plate Index	Citations (All 25 Codes)	Avg Citations / Active Plate
FY2021	377	24.3%	2,688	7.1
FY2022	488	31.4%	3,524	7.2
FY2023	555	35.7%	4,261	7.7
FY2024	518	33.4%	2,954	5.7
FY2025	376	24.2%	1,663	4.4
5-Year Total	637	41.0%	15,090	
Annual Average			3,018	

Source: NYC Open Data DOF Parking Violations Issued FY2021–FY2025, queried via Socrata API against all 25 safety-entailed codes. 916 of the 1,553 index plates returned zero citations across all 25 codes; absence of citation does not establish legal compliance given documented enforcement rates of 1.9–11%.

Table 2 — Citations by Violation Code by Year

Officer-issued codes are listed first, ranked by 5-year volume. Camera-issued codes (●) are listed separately at the bottom. Five codes returned zero citations and are shown in grey.

Code	Violation	FY2021	FY2022	FY2023	FY2024	FY2025	5-Yr Total	Cam
14	No Standing — Day/Time Limits	420	558	880	522	316	2,696	
40	Fire Hydrant	412	558	618	403	192	2,183	
19	No Standing — Bus Stop	416	452	622	427	171	2,088	

Code	Violation	FY2021	FY2022	FY2023	FY2024	FY2025	5-Yr Total	Cam
46	Double Parking	504	312	418	283	128	1,645	
48	Bike Lane	207	190	251	139	119	906	
50	Crosswalk	65	80	100	89	23	357	
10	No Stopping — Day/Time Limits	20	34	68	24	19	165	
18	No Standing — Bus Lane	20	13	29	31	7	100	
53	Safety Zone	25	21	22	19	13	100	
47	Double Parking — Midtown Commercial	22	17	19	5	11	74	
51	Sidewalk	12	10	11	4	10	47	
9	Obstructing Traffic/Intersection	1	2	3	2	—	8	
67	Pedestrian Ramp	—	1	4	2	—	7	
45	Traffic Lane	1	1	2	1	1	6	
98	Obstructing Driveway	—	2	—	1	1	4	
52	Blocking Intersection	1	—	—	—	—	1	
49	Excavation — Vehicle Obstructs Traffic	—	—	—	—	—	—	
54	Pickup/Discharge in Prohibited Zone	—	—	—	—	—	—	
55	Elevated/Divided Highway/Tunnel	—	—	—	—	—	—	
59	Angle Parking — Commercial Vehicle	—	—	—	—	—	—	
89	No Standing (Exc Trucks/Garment Dist)	—	—	—	—	—	—	
36	School Zone Speed (Camera)	277	756	632	454	198	2,317	•
5	Bus Lane Violation	72	182	310	242	174	980	•
7	Failure to Stop at Red Light	188	306	148	75	42	759	•
12	Mobile Bus Lane Violation	25	29	124	231	238	647	•
	Total	2,688	3,524	4,261	2,954	1,663	15,090	

Camera codes: 5 (Bus Lane), 7 (Red Light), 12 (Mobile Bus Lane), 36 (School Zone Speed). Five codes with zero citations: 49, 54, 55, 59, 89 — queried and confirmed absent for this fleet in this period.

Table 3 — Scaled Fleet: Estimated Annual Citations

The proxy fleet’s observed citation rate is scaled to four estimated fleet sizes. The scale multiplier equals the assumed active fleet divided by 637 — the number of proxy plates that received at least one citation. The market share estimate of 3,077 vehicles (★) is the primary estimate, derived from NYC package volume data; the others are sensitivity scenarios.

Fleet Assumption	Assumed Daily Vehicles	Scale Multiplier	Scaled Annual Citations	Scaled 5-Year Citations
Conservative	2,000	3.14x	9,476	47,378
Market Share ★	3,077	4.83x	14,578	72,892
Moderate	4,000	6.28x	18,951	94,757
Aggressive	5,000	7.85x	23,689	118,446

★ Market share fleet (3,077) derived from NYC Comptroller (2025) package volume data, eMarketer e-commerce share estimates, and industry-standard productivity of 300–350 packages per vehicle shift.

Table 4 — Scaled Fleet: Estimated True Annual Violations

Enforcement-rate multipliers are applied to the scaled annual citation baseline from Table 3. The 33x mid-range column (highlighted) is the primary estimate. All figures are floors; legally-permitted commercial double-parking under 34 RCNY §4-08(f)(1) generates no citation and is not captured in any enforcement dataset.

Fleet Assumption	Scaled Annual Citations	9x Estimate (11.21% rate)	33x Estimate (2.87–3% rate)	53x Estimate (1.9% rate)
Conservative (2,000)	9,476	85,281	312,697	502,210
Market Share (3,077) ★	14,578	131,205	481,084	772,651
Moderate (4,000)	18,951	170,562	625,394	1,004,421
Aggressive (5,000)	23,689	213,203	781,743	1,255,526

Multiplier sources: 9x = Arnav & Ensari (2024) 11.21% citywide 311 ticket rate; 33x = Restler (2025) field survey / Arnav & Ensari 2.87% safety-specific rate; 53x = Arnav (2023) 1.9% bike-lane rate.

NYC Last-Mile Delivery Proxy Fleet Study — Independent Replication Workbook

PURPOSE	This workbook contains all raw data, intermediate calculations, and query documentation needed for an independent third party to fully replicate the NYC Last-Mile Delivery Proxy Fleet Study (March 2026). Every figure appearing in the published study can be traced to a specific tab in this workbook.
SHEET INDEX	
API_Queries	Step-by-step Socrata API query documentation; dataset IDs; exact query syntax; filter logic; body-type and make-variant lookup tables. Start here to reproduce any figure from scratch.
Violation_Codes	Complete NYC DOF violation code reference table — all 25 safety-entailed codes used in the study, plus full code universe with fine amounts.
Plates_Index	All 1,553 proxy-fleet license plates queried. Source: NYC DEP idling-violation database (Amazon-affiliated entities registered in Seattle, WA). Plate IDs are real registration data from public enforcement records.
ChartA_Cohort	E-commerce cohort vs. legacy fleet citation counts FY2014–FY2025 (server-side Socrata aggregation, COM plate / VAN+DELV body type). Source of Chart A in the published document.
ChartB_Borough	E-commerce cohort citations by borough and fiscal year. Source of Chart B geographic migration analysis.
ChartC_ViolEst	Actual citations plus three enforcement-rate violation estimates (9x, 33x, 53x). Source of Chart C in the published document.
ProxyFleet_T1	Table 1 — Active plates and total citations by fiscal year (FY2021–FY2025).
ProxyFleet_T2	Table 2 — Proxy fleet citations by violation code by fiscal year.
ProxyFleet_T3	Table 3 — Scaled fleet citation estimates (four fleet-size assumptions).
ProxyFleet_T4	Table 4 — Scaled fleet true-violation estimates with enforcement multipliers.
Makes_AllMakes	All make-series citation data returned by the Socrata API for COM VAN+DELV FY2014–FY2025, including makes outside the study cohorts.
KEY	
METHODOLOGICAL NOTES	
Fiscal Year Definition	July 1 – June 30. FY2014 is a partial year: August 2013 – June 2014.
Body-Type Filter	VAN and DELV only. REFG (refrigerated) excluded — predominantly food distribution, not e-commerce last-mile.
Plate-Type Filter	COM (commercial) plates only.
Proxy Fleet Source	1,553 plates identified from NYC DEP idling-violation database as associated with Amazon-related entities registered in Seattle, WA. Of those, 637 plates received at least one citation in FY2021–FY2025 across the 25 safety-entailed codes.
Fleet Scale Basis	Primary estimate: 3,077 vehicles/day ★ Market Share). Derived from NYC Comptroller (2025) package-volume data, eMarketer e-commerce share estimates, and industry-standard productivity of 300–350 packages/vehicle/shift.
Enforcement Multipliers	9x = Arnav & Ensari (2024) 11.21% citywide 311 ticket rate. 33x = Arnav & Ensari 2.87% safety-specific rate / Restler (2025) ~3% Downtown Brooklyn field survey. 53x = Arnav (2023) 1.9% bike-lane rate.
RAM/DODGE Treatment	Combined as 'Ram/Dodge (ProMaster)' throughout — same vehicle platform (Stellantis), different brand name used in registration records. DODGE citations collapsed from ~36,000 (FY2021) to ~1,900 (FY2023) as registrations shifted to RAM — a data artifact, not a behavioral change.
Truncation Note (Gen 1 only)	NYC Open Data files for FY2021–FY2023 are each truncated at 1,048,575 rows (Excel max) in earlier Generation 1 CSVs. This workbook uses Generation 2 data from direct Socrata API server-side aggregation; NO truncation applies here.
FY2025 Status	FY2025 ends June 30, 2025. All FY2025 figures are PRELIMINARY.
PRIMARY DATA SOURCE	NYC Department of Finance, Parking Violations Issued — Fiscal Year datasets. Available at: https://data.cityofnewyork.us
API ENDPOINT	https://data.cityofnewyork.us/resource/{dataset_id}.json (Socrata REST API)
API DOCUMENTATION	https://dev.socrata.com/docs/queries/

Socrata API Query Documentation — NYC DOF Parking Violations Issued FY2014–FY2025

SECTION 1 — Dataset IDs (one dataset per fiscal year)

Fiscal Year	Dataset ID	Date Range	NYC Open Data URL
FY2014	jt7v-77mi	2013 – Jun 2014 (partial)	https://data.cityofnewyork.us/resource/jt7v-77mi.json
FY2015	c284-tqph	Jul 2014 – Jun 2015	https://data.cityofnewyork.us/resource/c284-tqph.json
FY2016	kiv2-tbus	Jul 2015 – Jun 2016	https://data.cityofnewyork.us/resource/kiv2-tbus.json
FY2017	2bnn-yakx	Jul 2016 – Jun 2017	https://data.cityofnewyork.us/resource/2bnn-yakx.json
FY2018	a5td-mswe	Jul 2017 – Jun 2018	https://data.cityofnewyork.us/resource/a5td-mswe.json
FY2019	faiq-9dfq	Jul 2018 – Jun 2019	https://data.cityofnewyork.us/resource/faiq-9dfq.json
FY2020	p7t3-5i9s	Jul 2019 – Jun 2020	https://data.cityofnewyork.us/resource/p7t3-5i9s.json
FY2021	kvfd-bves	Jul 2020 – Jun 2021	https://data.cityofnewyork.us/resource/kvfd-bves.json
FY2022	7mxj-7a6y	Jul 2021 – Jun 2022	https://data.cityofnewyork.us/resource/7mxj-7a6y.json
FY2023	869v-vr48	Jul 2022 – Jun 2023	https://data.cityofnewyork.us/resource/869v-vr48.json
FY2024	8zf9-spf8	Jul 2023 – Jun 2024	https://data.cityofnewyork.us/resource/8zf9-spf8.json
FY2025	m5vz-tzqv	2024 – Jun 2025 (PRELIMINARY)	https://data.cityofnewyork.us/resource/m5vz-tzqv.json

SECTION 2 — Query Types and SoQL Syntax

Query Name	Purpose	Target Sheet(s)	Exact SoQL Query String (substitute {dataset_id} and {VIO_CODES} as documented)
TOTAL_ALL_VEHICLE	Citywide all-vehicle citation count	ChartA_Cohort, Makes_AllMakes	GET https://data.cityofnewyork.us/resource/{dataset_id}.json?\$select=COUNT(*) AS total&\$where=violation_code IN ({VIO_CODES})&\$limit=1 VIO_CODES = '5','7','9','10','12','14','18','19','36','40','45','46','47','48','49','50','51','52','53','54','55','59','67','89','98'
TOTAL_COM_VAN	All COM plate / VAN+DELV body type citations	ChartA_Cohort	GET https://data.cityofnewyork.us/resource/{dataset_id}.json?\$select=COUNT(*) AS total&\$where=plate_type='COM' AND vehicle_body_type IN ('VAN','DELV') AND violation_code IN ({VIO_CODES})&\$limit=1
BY_MAKE_COM_VAN	Citation count grouped by vehicle_make for COM VAN+DELV	ChartA_Cohort, Makes_AllMakes	GET https://data.cityofnewyork.us/resource/{dataset_id}.json?\$select=vehicle_make,COUNT(*) AS citations&\$where=plate_type='COM' AND vehicle_body_type IN ('VAN','DELV') AND violation_code IN ({VIO_CODES})&\$group=vehicle_make&\$order=citations DESC&\$limit=5000
BY_BOROUGH_COM	E-cohort citations grouped by violation_county (borough)	ChartB_Borough	GET https://data.cityofnewyork.us/resource/{dataset_id}.json?\$select=violation_county,COUNT(*) AS citations&\$where=plate_type='COM' AND vehicle_body_type IN ('VAN','DELV') AND vehicle_make IN ({ECHOHORT_MAKES}) AND violation_code IN ({VIO_CODES})&\$group=violation_county&\$order=citations DESC&\$limit=5000 ECHOHORT_MAKES = all known spelling variants of Ford (Transit), Mercedes-Benz/Sprinter, Ram/Dodge (ProMaster), Rivian — see Section 4 Make Variants table below
PROXY_FLEET_BY	Citation lookup for each proxy fleet plate across all 25 codes	RawCitations, ProxyFleet_T1, ProxyFleet_T2	GET https://data.cityofnewyork.us/resource/{dataset_id}.json?\$select=plate_id,violation_code,violation_county,COUNT(*) AS citations&\$where=plate_id IN ({PLATE_LIST}) AND violation_code IN ({VIO_CODES})&\$group=plate_id,violation_code,violation_county&\$limit=5000 PLATE_LIST = comma-separated quoted plate IDs from Plates_Index sheet (1,553 plates). NOTE: Socrata IN() clauses may have character limits: batch into groups of ~200 plates per query and union

SECTION 3 — Fixed Filter Parameters

Parameter	Value	Field Name in Dataset	Notes
plate_type	COM	plate_type	Restricts to commercial plates only. Excludes PAS (passenger), etc.
vehicle_body_type	(VAN, DELV)	vehicle_body_type	VAN = cargo/passenger vans. DELV = delivery body type. Both are included.
vehicle_body_type	(REFG)	vehicle_body_type	Refrigerated trucks excluded — predominantly food distribution, not e-commerce last-mile.
violation_code set	See Violation_Codes sheet	violation_code	25 safety-entailed codes. Full list in Violation_Codes sheet.
\$limit	50000 (or higher)	(API parameter)	Set high enough to capture all rows. Server-side GROUP BY means row count = number of unique groups, not raw citations.
App token	Register at data.cityofnewyork.us	(HTTP header X-App-Token)	Required for production queries. Throttling applies to unauthenticated requests.

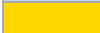
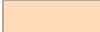
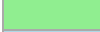


SECTION 4 — Make Variant Lookup Table (fuzzy canonical grouping)

Canonical Group	Cohort	Known Raw Variants in Dataset	Notes
Ford (Transit)	E-Commerce	FORD, Ford, FORD TRANSIT, ford	Dominant make FY2015 onward. All FORD citations attributed to Transit in commercial van context.
Mercedes-Benz (Sprinter)	E-Commerce	ME/BE, MERZ, MERCEDES, MERC, MB, SPRINTER_mercedes	ME/BE is the dominant raw code in the dataset. Multiple abbreviation variants present.
Ram/Dodge (ProMaster)	E-Commerce	RAM, DODGE, Ram, Dodge, DODGE/RAM	Combined as single series throughout. DODGE citations collapsed -FY2022 as registrations shifted to RAM brand — data artifact of Stellantis 2009 brand separation, not a behavioral change.
Rivian (EDV)	E-Commerce	RIVIA, RIVI, Rivian, RIVIAN	First appears FY2023. Deployed exclusively in Amazon DSP fleets — near-pure Amazon signal. RIVIA is dominant raw variant.
Freightliner/Freuhaufer	Legacy	FRUEH, FRUE, FREIGHT FREIGHTLINER	Largest legacy make. Includes older Fruehauf-bodied vehicles.
Workhorse	Legacy	WORK, WORKHORSE, WH	Step-van platform historically used by UPS, USPS, and food delivery.
International	Legacy	INTER, INTL, INTERNATIONAL	Commercial truck/van manufacturer.
Hino	Legacy	HINO	Japanese commercial vehicle brand used in food/beverage distribution.
Isuzu	Legacy	ISUZU, ISU	Box truck platform common in food/beverage distribution.

DOF Parking Violation Codes — Complete Reference with Study Safety-Code Designat

Code	Description	Fine: Manhattan ≤96th St (\$)	Fine: All Other Areas (\$)	Safety- Entailed (Study Code)
1	FAILURE TO DISPLAY BUS PERMIT	\$515	\$515	
2	NO OPERATOR NAM/ADD/PH DISPLAY	\$515	\$515	
3	UNAUTHORIZED PASSENGER PICK-UP	\$515	\$515	
4	BUS PARKING IN LOWER MANHATTAN	\$115	\$115	
5	BUS LANE VIOLATION (camera)	\$50	\$50	Camera-Enforced
6	OVERNIGHT TRACTOR TRAILER PKG	\$265	\$265	
7	FAILURE TO STOP AT RED LIGHT (camera)	\$50	\$50	Camera-Enforced
8	IDLING	\$115	\$115	
9	OBSTRUCTING TRAFFIC/INTERSECTION	\$115	\$115	Lane/Intersection
10	NO STOPPING — DAY/TIME LIMITS	\$115	\$115	Lane/Intersection
11	NO STANDING — HOTEL LOADING	\$115	\$115	
12	MOBILE BUS LANE VIOLATION (camera)	\$50	\$50	Camera-Enforced
13	NO STANDING — TAXI STAND	\$115	\$115	
14	NO STANDING — DAY/TIME LIMITS	\$115	\$115	Lane/Intersection
15	NO STANDING — OFF-STREET LOT	\$115	\$115	
16	NO STANDING — EXC. TRUCK LOADING	\$95	\$95	
17	NO STANDING — EXC. AUTH. VEHICLE	\$95	\$95	
18	NO STANDING — BUS LANE	\$115	\$115	Vulnerable User
19	NO STANDING — BUS STOP	\$115	\$115	Vulnerable User
20	NO PARKING — DAY/TIME LIMITS	\$65	\$60	
21	NO PARKING — STREET CLEANING	\$65	\$45	
22	NO STAND TAXI/FHV RELIEF STAND	\$115	\$115	
23	NO PARKING — TAXI STAND	\$65	\$60	
24	NO PARKING — EXC. AUTH. VEHICLE	\$65	\$60	
25	NO STANDING — COMMUTER VAN STOP	\$115	\$115	
26	NO STANDING — FOR HIRE VEH STAND	\$115	\$115	
27	NO PARKING — EXC. DSBLTY PERMIT	\$180	\$180	
28	OVERTIME STANDING DP	\$95	\$95	
29	ALTERING INTERCITY BUS PERMIT	\$515	\$515	
30	NO STOP/STANDING EXCEPT PAS P/U	\$515	\$515	
31	NO STANDING — COMM METER ZONE	\$115	\$115	
32	OT PARKING — MISSING/BROKEN METER	\$65	\$35	
33	MISUSE PARKING PERMIT	\$65	\$65	
34	EXPIRED METER	\$65	\$35	
35	SELLING/OFFERING MERCHANDISE — ME	\$65	\$35	
36	PHOTO SCHOOL ZONE SPEED VIOLATION	\$50	\$50	Camera-Enforced
37	EXPIRED MUNI METER	\$65	\$35	
38	FAIL TO DISPLAY MUNI METER RECEIPT	\$65	\$35	
39	OVERTIME PKG — TIME LIMIT POSTED	\$65	\$60	
40	FIRE HYDRANT	\$115	\$115	Emergency Access
41	MISCELLANEOUS	\$0	\$0	
42	EXPIRED MUNI MTR — COMM MTR ZN	\$65	\$35	
43	EXPIRED METER — COMM METER ZONE	\$65	\$35	
44	PKG IN EXC. OF LIM — COMM MTR ZN	\$65	\$35	
45	TRAFFIC LANE	\$115	\$115	Lane/Intersection
46	DOUBLE PARKING	\$115	\$115	Lane/Intersection
47	DOUBLE PARKING — MIDTOWN COMMER	\$115	\$115	Lane/Intersection

48	BIKE LANE	\$115	\$115	Vulnerable User
49	EXCAVATION — VEHICLE OBSTRUCTS TR	\$95	\$95	Other Obstruction
50	CROSSWALK	\$115	\$115	Vulnerable User
51	SIDEWALK	\$115	\$115	Vulnerable User
52	BLOCKING INTERSECTION	\$115	\$115	Lane/Intersection
53	SAFETY ZONE	\$115	\$115	Lane/Intersection
54	PICKUP/DISCHARGE IN PROHIBITED ZON	\$115	\$115	Other Obstruction
55	ELEVATED/DIVIDED HIGHWAY/TUNNEL	\$115	\$115	Other Obstruction
56	DIVIDED HIGHWAY	\$115	\$115	
57	BLUE ZONE	\$65	\$65	
58	MARGINAL STREET/WATER FRONT	\$65	\$45	
59	ANGLE PARKING — COMMERCIAL VEHIC	\$115	\$115	Other Obstruction
60	ANGLE PARKING	\$65	\$45	
61	WRONG WAY	\$65	\$45	
62	BEYOND MARKED SPACE	\$65	\$45	
63	NIGHTTIME STD/PKG IN A PARK	\$95	\$95	
64	NO STANDING EXCEPT D/S	\$95	\$95	
65	OVERTIME STANDING D/S	\$95	\$95	
66	DETACHED TRAILER	\$65	\$45	
67	PEDESTRIAN RAMP	\$165	\$165	Emergency Access
68	NON-COMPLIANCE WITH POSTED SIGN	\$65	\$60	
69	FAIL TO DISPLAY MUNI METER RECEIPT	\$65	\$35	
70	REG. STICKER — EXPIRED/MISSING	\$65	\$65	
71	INSP. STICKER — EXPIRED/MISSING	\$65	\$65	
72	INSP STICKER — MUTILATED/COUNTERFE	\$65	\$65	
73	REG STICKER — MUTILATED/COUNTERFE	\$65	\$65	
74	FRONT OR BACK PLATE MISSING	\$65	\$65	
75	NO MATCH — PLATE/STICKER	\$65	\$65	
76	VIN OBSCURED	\$65	\$65	
77	PARKED BUS — EXC. DESIGNATED AREA	\$65	\$45	
78	NIGHT PKG ON RESIDENTIAL ST — COMM	\$65	\$65	
79	UNAUTHORIZED BUS LAYOVER	\$115	\$115	
80	MISSING EQUIPMENT	\$60	\$45	
81	NO STANDING EXCEPT DP	\$95	\$95	
82	COMMERCIAL PLATES — UNALTERED VEI	\$115	\$115	
83	IMPROPER REGISTRATION	\$65	\$65	
84	PLATFORM LIFTS LOWERED POSITION CO	\$65	\$45	
85	STORAGE — 3HR COMMERCIAL	\$65	\$65	
86	MIDTOWN PKG OR STANDING — 3HR LIMI	\$115	\$115	
87	FRAUDULENT USE PARKING PERMIT	\$65	\$65	
88	UNALTERED COMM VEH — NAME/ADDRES	\$115	\$115	
89	NO STANDING (EXC TRUCKS/GARMENT D	\$115	\$115	Lane/Intersection
90	VEH — SALE/WASHING/REPAIRING/DRIVE	\$40	\$25	
91	VEHICLE FOR SALE (DEALERS ONLY)	\$65	\$45	
92	WASH/REPAIR VEHICLE — REPAIR ONLY	\$65	\$45	
93	REMOVE/REPLACE FLAT TIRE	\$65	\$65	
96	RAILROAD CROSSING	\$95	\$95	
97	VACANT LOT	\$65	\$45	
98	OBSTRUCTING DRIVEWAY	\$95	\$95	Other Obstruction
99	OTHER	\$105	\$105	

COLOR LEGEND — Safety-Entailed Code Categories	
	Emergency Access Obstruction (codes 40, 67)
	Lane and Intersection Obstruction (codes 9, 10, 14, 45, 46, 47, 52, 53, 89)
	Vulnerable User Infrastructure (codes 18, 19, 48, 50, 51)
	Other Travel Obstruction (codes 49, 54, 55, 59, 98)
	Camera-Enforced / Automated Detection (codes 5, 7, 12, 36)

Proxy Fleet Plate Index — 1,553 Plates (Source: NYC DEP Idling-Violation Database)

Plate ID	Citations (All Years, All Codes)	Source / Notes
<i>Source: NYC Department of Environmental Protection (DEP) idling-violation enforcement database. Plates were identified as belonging to Amazon-affiliated entities registered in Seattle, WA. All are NYC public enforcement records. Of 1,553 plates queried, 637 received at least one citation across the 25 safety-entailed codes in FY2021–FY2025. 916 returned zero citations (absence does not establish compliance given 1.9–11% enforcement rates)</i>		
XKCH38	124	NYC DEP idling database; public enforcement record
31BKCL	114	NYC DEP idling database; public enforcement record
XLDS82	112	NYC DEP idling database; public enforcement record
XHFD97	111	NYC DEP idling database; public enforcement record
XJUU66	106	NYC DEP idling database; public enforcement record
XMBG48	106	NYC DEP idling database; public enforcement record
11082MP	91	NYC DEP idling database; public enforcement record
XKZE45	90	NYC DEP idling database; public enforcement record
26721NA	86	NYC DEP idling database; public enforcement record
XKZE11	84	NYC DEP idling database; public enforcement record
XLMW30	82	NYC DEP idling database; public enforcement record
92511NA	77	NYC DEP idling database; public enforcement record
26503NA	72	NYC DEP idling database; public enforcement record
XLPF51	72	NYC DEP idling database; public enforcement record
XKUA34	70	NYC DEP idling database; public enforcement record
92513NA	69	NYC DEP idling database; public enforcement record
XKJD84	69	NYC DEP idling database; public enforcement record
XKUB29	69	NYC DEP idling database; public enforcement record
XKPV42	68	NYC DEP idling database; public enforcement record
XHNX37	67	NYC DEP idling database; public enforcement record
XKUB31	66	NYC DEP idling database; public enforcement record
XMBE43	66	NYC DEP idling database; public enforcement record
92514NA	65	NYC DEP idling database; public enforcement record
XKUA36	65	NYC DEP idling database; public enforcement record
XLTN68	65	NYC DEP idling database; public enforcement record
XKUA35	64	NYC DEP idling database; public enforcement record
XLTM74	64	NYC DEP idling database; public enforcement record
QEGG27	62	NYC DEP idling database; public enforcement record
XHNV19	62	NYC DEP idling database; public enforcement record
XKUB25	62	NYC DEP idling database; public enforcement record
83632ND	61	NYC DEP idling database; public enforcement record
XKJD65	61	NYC DEP idling database; public enforcement record
07ABES	60	NYC DEP idling database; public enforcement record
XHFC44	60	NYC DEP idling database; public enforcement record
XKHJ10	60	NYC DEP idling database; public enforcement record
26650NA	59	NYC DEP idling database; public enforcement record
XKHW23	59	NYC DEP idling database; public enforcement record
XKJJ70	59	NYC DEP idling database; public enforcement record
XLYT21	58	NYC DEP idling database; public enforcement record
99347NA	57	NYC DEP idling database; public enforcement record
32BKCL	56	NYC DEP idling database; public enforcement record
XKCG97	56	NYC DEP idling database; public enforcement record
58066NA	55	NYC DEP idling database; public enforcement record
E17NBM	55	NYC DEP idling database; public enforcement record
XKJG82	55	NYC DEP idling database; public enforcement record

14896MP	54	NYC DEP idling database; public enforcement record
XKPV38	54	NYC DEP idling database; public enforcement record
QEGB73	53	NYC DEP idling database; public enforcement record
XJXW89	53	NYC DEP idling database; public enforcement record
XKHW34	52	NYC DEP idling database; public enforcement record
XKUA29	51	NYC DEP idling database; public enforcement record
XLSL77	51	NYC DEP idling database; public enforcement record
97BEEF	50	NYC DEP idling database; public enforcement record
XKMZ30	50	NYC DEP idling database; public enforcement record
XLJX20	49	NYC DEP idling database; public enforcement record
14898MP	48	NYC DEP idling database; public enforcement record
QBXE28	48	NYC DEP idling database; public enforcement record
XHFD68	48	NYC DEP idling database; public enforcement record
XKEY75	48	NYC DEP idling database; public enforcement record
XKUB24	48	NYC DEP idling database; public enforcement record
XMJT33	48	NYC DEP idling database; public enforcement record
26143NA	47	NYC DEP idling database; public enforcement record
XLES84	47	NYC DEP idling database; public enforcement record
20989MN	46	NYC DEP idling database; public enforcement record
27107NA	46	NYC DEP idling database; public enforcement record
XJUU44	46	NYC DEP idling database; public enforcement record
XKJG81	46	NYC DEP idling database; public enforcement record
XLPY62	46	NYC DEP idling database; public enforcement record
32903NB	45	NYC DEP idling database; public enforcement record
XHFD72	45	NYC DEP idling database; public enforcement record
XKPT96	45	NYC DEP idling database; public enforcement record
15000MP	44	NYC DEP idling database; public enforcement record
XKPV41	44	NYC DEP idling database; public enforcement record
14891MP	42	NYC DEP idling database; public enforcement record
92510NA	42	NYC DEP idling database; public enforcement record
15BXKE	41	NYC DEP idling database; public enforcement record
32ABES	41	NYC DEP idling database; public enforcement record
XJUU43	41	NYC DEP idling database; public enforcement record
27101NA	40	NYC DEP idling database; public enforcement record
32901NB	40	NYC DEP idling database; public enforcement record
XMBG47	40	NYC DEP idling database; public enforcement record
11099MP	39	NYC DEP idling database; public enforcement record
27102NA	39	NYC DEP idling database; public enforcement record
XKPV39	39	NYC DEP idling database; public enforcement record
QIAM21	38	NYC DEP idling database; public enforcement record
26213NA	37	NYC DEP idling database; public enforcement record
99451NA	37	NYC DEP idling database; public enforcement record
XLPE43	37	NYC DEP idling database; public enforcement record
32902NB	35	NYC DEP idling database; public enforcement record
82BTJD	35	NYC DEP idling database; public enforcement record
XLTP55	35	NYC DEP idling database; public enforcement record
82105ND	34	NYC DEP idling database; public enforcement record
99348NA	34	NYC DEP idling database; public enforcement record
XJXV81	34	NYC DEP idling database; public enforcement record
XLET18	34	NYC DEP idling database; public enforcement record
XLJX21	34	NYC DEP idling database; public enforcement record

XLXF74	33	NYC DEP idling database; public enforcement record
14974MP	32	NYC DEP idling database; public enforcement record
XLPE25	32	NYC DEP idling database; public enforcement record
86AYPS	31	NYC DEP idling database; public enforcement record
XKPT99	31	NYC DEP idling database; public enforcement record
3485660	30	NYC DEP idling database; public enforcement record
XKPT98	30	NYC DEP idling database; public enforcement record
XKUA37	30	NYC DEP idling database; public enforcement record
XLKM95	30	NYC DEP idling database; public enforcement record
XMPW15	30	NYC DEP idling database; public enforcement record
16530MP	29	NYC DEP idling database; public enforcement record
30BKCL	29	NYC DEP idling database; public enforcement record
QEFS41	29	NYC DEP idling database; public enforcement record
XJUV75	29	NYC DEP idling database; public enforcement record
XLKM94	29	NYC DEP idling database; public enforcement record
XKPS58	28	NYC DEP idling database; public enforcement record
XLES83	28	NYC DEP idling database; public enforcement record
XLKM96	28	NYC DEP idling database; public enforcement record
XMLW29	28	NYC DEP idling database; public enforcement record
XLTN72	28	NYC DEP idling database; public enforcement record
XLTP56	28	NYC DEP idling database; public enforcement record
XNLY35	28	NYC DEP idling database; public enforcement record
QBXE26	27	NYC DEP idling database; public enforcement record
XHFD13	27	NYC DEP idling database; public enforcement record
XKZE16	27	NYC DEP idling database; public enforcement record
XLKF71	27	NYC DEP idling database; public enforcement record
XLTM75	27	NYC DEP idling database; public enforcement record
XLTN74	27	NYC DEP idling database; public enforcement record
XMBG53	27	NYC DEP idling database; public enforcement record
3486377	26	NYC DEP idling database; public enforcement record
XHFD63	26	NYC DEP idling database; public enforcement record
XLET17	26	NYC DEP idling database; public enforcement record
XLKM45	26	NYC DEP idling database; public enforcement record
82089ND	25	NYC DEP idling database; public enforcement record
92509NA	25	NYC DEP idling database; public enforcement record
XLES51	25	NYC DEP idling database; public enforcement record
XLES80	25	NYC DEP idling database; public enforcement record
14960MP	24	NYC DEP idling database; public enforcement record
16552MP	24	NYC DEP idling database; public enforcement record
XKEY70	24	NYC DEP idling database; public enforcement record
XMBG49	24	NYC DEP idling database; public enforcement record
XKJD12	23	NYC DEP idling database; public enforcement record
XKWL88	23	NYC DEP idling database; public enforcement record
XLJV48	23	NYC DEP idling database; public enforcement record
XLKN10	23	NYC DEP idling database; public enforcement record
XLpz86	23	NYC DEP idling database; public enforcement record
XKPT97	22	NYC DEP idling database; public enforcement record
XLXF71	22	NYC DEP idling database; public enforcement record
XNYZ20	22	NYC DEP idling database; public enforcement record
XPXY76	22	NYC DEP idling database; public enforcement record
26145NA	21	NYC DEP idling database; public enforcement record

82088ND	21	NYC DEP idling database; public enforcement record
82106ND	21	NYC DEP idling database; public enforcement record
82617NA	20	NYC DEP idling database; public enforcement record
XLGN96	20	NYC DEP idling database; public enforcement record
XLJV49	20	NYC DEP idling database; public enforcement record
XMFT18	20	NYC DEP idling database; public enforcement record
26972NA	19	NYC DEP idling database; public enforcement record
27108NA	19	NYC DEP idling database; public enforcement record
QEGG26	19	NYC DEP idling database; public enforcement record
XNEF30	19	NYC DEP idling database; public enforcement record
16555MP	18	NYC DEP idling database; public enforcement record
82109ND	18	NYC DEP idling database; public enforcement record
XLET41	18	NYC DEP idling database; public enforcement record
26532NA	17	NYC DEP idling database; public enforcement record
57719NA	17	NYC DEP idling database; public enforcement record
89BSZM	17	NYC DEP idling database; public enforcement record
XMJT34	17	NYC DEP idling database; public enforcement record
34BKBC	16	NYC DEP idling database; public enforcement record
35446NC	16	NYC DEP idling database; public enforcement record
58402NA	16	NYC DEP idling database; public enforcement record
58447NA	16	NYC DEP idling database; public enforcement record
99943MN	16	NYC DEP idling database; public enforcement record
99946MN	16	NYC DEP idling database; public enforcement record
99970MN	16	NYC DEP idling database; public enforcement record
XKCG25	16	NYC DEP idling database; public enforcement record
XMFS75	16	NYC DEP idling database; public enforcement record
XMKC79	16	NYC DEP idling database; public enforcement record
15AAIW	15	NYC DEP idling database; public enforcement record
27106NA	15	NYC DEP idling database; public enforcement record
82094ND	15	NYC DEP idling database; public enforcement record
82611NA	15	NYC DEP idling database; public enforcement record
QEFL33	15	NYC DEP idling database; public enforcement record
QEFZ40	15	NYC DEP idling database; public enforcement record
XJXU34	15	NYC DEP idling database; public enforcement record
XLET16	15	NYC DEP idling database; public enforcement record
XLMW35	15	NYC DEP idling database; public enforcement record
14944MP	14	NYC DEP idling database; public enforcement record
40063NF	14	NYC DEP idling database; public enforcement record
49AUZD	14	NYC DEP idling database; public enforcement record
78165NE	14	NYC DEP idling database; public enforcement record
82201ND	14	NYC DEP idling database; public enforcement record
86331MM	14	NYC DEP idling database; public enforcement record
99948MN	14	NYC DEP idling database; public enforcement record
XLXV69	14	NYC DEP idling database; public enforcement record
XPMT45	14	NYC DEP idling database; public enforcement record
11098MP	13	NYC DEP idling database; public enforcement record
26155NA	13	NYC DEP idling database; public enforcement record
26966NA	13	NYC DEP idling database; public enforcement record
35717NA	13	NYC DEP idling database; public enforcement record
53043NB	13	NYC DEP idling database; public enforcement record
58436NA	13	NYC DEP idling database; public enforcement record

82096ND	13	NYC DEP idling database; public enforcement record
QEFL46	13	NYC DEP idling database; public enforcement record
QIAE15	13	NYC DEP idling database; public enforcement record
XKZE33	13	NYC DEP idling database; public enforcement record
XLES49	13	NYC DEP idling database; public enforcement record
XNFX14	13	NYC DEP idling database; public enforcement record
26571NA	12	NYC DEP idling database; public enforcement record
3222317	12	NYC DEP idling database; public enforcement record
99969MN	12	NYC DEP idling database; public enforcement record
XGLT95	12	NYC DEP idling database; public enforcement record
3266188	11	NYC DEP idling database; public enforcement record
40620NF	11	NYC DEP idling database; public enforcement record
58073NA	11	NYC DEP idling database; public enforcement record
82107ND	11	NYC DEP idling database; public enforcement record
95479NE	11	NYC DEP idling database; public enforcement record
99097NC	11	NYC DEP idling database; public enforcement record
XKEY71	11	NYC DEP idling database; public enforcement record
XLES48	11	NYC DEP idling database; public enforcement record
XLKL18	11	NYC DEP idling database; public enforcement record
XNEF68	11	NYC DEP idling database; public enforcement record
XNHR83	11	NYC DEP idling database; public enforcement record
26106NA	10	NYC DEP idling database; public enforcement record
2892901	10	NYC DEP idling database; public enforcement record
3337732	10	NYC DEP idling database; public enforcement record
58052NA	10	NYC DEP idling database; public enforcement record
82092ND	10	NYC DEP idling database; public enforcement record
82584NA	10	NYC DEP idling database; public enforcement record
86338MM	10	NYC DEP idling database; public enforcement record
QEGB77	10	NYC DEP idling database; public enforcement record
XKZE18	10	NYC DEP idling database; public enforcement record
XLAV46	10	NYC DEP idling database; public enforcement record
XLES81	10	NYC DEP idling database; public enforcement record
XLFD99	10	NYC DEP idling database; public enforcement record
XLKF68	10	NYC DEP idling database; public enforcement record
XLXB40	10	NYC DEP idling database; public enforcement record
XLXZ14	10	NYC DEP idling database; public enforcement record
XLXZ15	10	NYC DEP idling database; public enforcement record
XLXZ16	10	NYC DEP idling database; public enforcement record
XMKE80	10	NYC DEP idling database; public enforcement record
XNHU38	10	NYC DEP idling database; public enforcement record
XNTX90	10	NYC DEP idling database; public enforcement record
24563ND	9	NYC DEP idling database; public enforcement record
26961NA	9	NYC DEP idling database; public enforcement record
26974NA	9	NYC DEP idling database; public enforcement record
3486225	9	NYC DEP idling database; public enforcement record
58987NA	9	NYC DEP idling database; public enforcement record
59048NA	9	NYC DEP idling database; public enforcement record
73706NF	9	NYC DEP idling database; public enforcement record
82090ND	9	NYC DEP idling database; public enforcement record
82095ND	9	NYC DEP idling database; public enforcement record
82101ND	9	NYC DEP idling database; public enforcement record

82108ND	9	NYC DEP idling database; public enforcement record
82577NA	9	NYC DEP idling database; public enforcement record
99387NA	9	NYC DEP idling database; public enforcement record
99962MN	9	NYC DEP idling database; public enforcement record
XLET33	9	NYC DEP idling database; public enforcement record
XLRD95	9	NYC DEP idling database; public enforcement record
XLUS99	9	NYC DEP idling database; public enforcement record
XMKE66	9	NYC DEP idling database; public enforcement record
XNEF69	9	NYC DEP idling database; public enforcement record
11083MP	8	NYC DEP idling database; public enforcement record
13143NB	8	NYC DEP idling database; public enforcement record
14918MP	8	NYC DEP idling database; public enforcement record
24560ND	8	NYC DEP idling database; public enforcement record
26112NA	8	NYC DEP idling database; public enforcement record
26137NA	8	NYC DEP idling database; public enforcement record
31ABES	8	NYC DEP idling database; public enforcement record
3360390	8	NYC DEP idling database; public enforcement record
35775NA	8	NYC DEP idling database; public enforcement record
50701MN	8	NYC DEP idling database; public enforcement record
50705MN	8	NYC DEP idling database; public enforcement record
53041NB	8	NYC DEP idling database; public enforcement record
57913NA	8	NYC DEP idling database; public enforcement record
58409NA	8	NYC DEP idling database; public enforcement record
58AKWY	8	NYC DEP idling database; public enforcement record
77046MN	8	NYC DEP idling database; public enforcement record
82103ND	8	NYC DEP idling database; public enforcement record
82104ND	8	NYC DEP idling database; public enforcement record
82601NA	8	NYC DEP idling database; public enforcement record
82618NA	8	NYC DEP idling database; public enforcement record
82619NA	8	NYC DEP idling database; public enforcement record
86304MM	8	NYC DEP idling database; public enforcement record
E11NBM	8	NYC DEP idling database; public enforcement record
XKZE21	8	NYC DEP idling database; public enforcement record
XKZE29	8	NYC DEP idling database; public enforcement record
XKZE31	8	NYC DEP idling database; public enforcement record
XKZE52	8	NYC DEP idling database; public enforcement record
XLET13	8	NYC DEP idling database; public enforcement record
XLET28	8	NYC DEP idling database; public enforcement record
XLLH65	8	NYC DEP idling database; public enforcement record
XLPY19	8	NYC DEP idling database; public enforcement record
XMFS77	8	NYC DEP idling database; public enforcement record
07BSYI	7	NYC DEP idling database; public enforcement record
14378NB	7	NYC DEP idling database; public enforcement record
14943MP	7	NYC DEP idling database; public enforcement record
15016MP	7	NYC DEP idling database; public enforcement record
16538MP	7	NYC DEP idling database; public enforcement record
16545MP	7	NYC DEP idling database; public enforcement record
16547MP	7	NYC DEP idling database; public enforcement record
24561ND	7	NYC DEP idling database; public enforcement record
26531NA	7	NYC DEP idling database; public enforcement record
26544NA	7	NYC DEP idling database; public enforcement record

27246NA	7	NYC DEP idling database; public enforcement record
32662NB	7	NYC DEP idling database; public enforcement record
3266846	7	NYC DEP idling database; public enforcement record
33455NB	7	NYC DEP idling database; public enforcement record
34042NB	7	NYC DEP idling database; public enforcement record
3485644	7	NYC DEP idling database; public enforcement record
3486394	7	NYC DEP idling database; public enforcement record
35698NA	7	NYC DEP idling database; public enforcement record
52199NE	7	NYC DEP idling database; public enforcement record
58074NA	7	NYC DEP idling database; public enforcement record
59047NA	7	NYC DEP idling database; public enforcement record
76382MM	7	NYC DEP idling database; public enforcement record
76384MM	7	NYC DEP idling database; public enforcement record
82098ND	7	NYC DEP idling database; public enforcement record
92174NE	7	NYC DEP idling database; public enforcement record
99096NC	7	NYC DEP idling database; public enforcement record
99927MN	7	NYC DEP idling database; public enforcement record
QIAM22	7	NYC DEP idling database; public enforcement record
XFSX44	7	NYC DEP idling database; public enforcement record
XKPS67	7	NYC DEP idling database; public enforcement record
XKPS69	7	NYC DEP idling database; public enforcement record
XKVP44	7	NYC DEP idling database; public enforcement record
XKZE51	7	NYC DEP idling database; public enforcement record
XLAX94	7	NYC DEP idling database; public enforcement record
XLXS47	7	NYC DEP idling database; public enforcement record
XLJW17	7	NYC DEP idling database; public enforcement record
XLMT60	7	NYC DEP idling database; public enforcement record
XLMT88	7	NYC DEP idling database; public enforcement record
XLPB57	7	NYC DEP idling database; public enforcement record
XLTN73	7	NYC DEP idling database; public enforcement record
XLWU32	7	NYC DEP idling database; public enforcement record
XLXE14	7	NYC DEP idling database; public enforcement record
XNEG11	7	NYC DEP idling database; public enforcement record
XNWA91	7	NYC DEP idling database; public enforcement record
XP725D	7	NYC DEP idling database; public enforcement record
XPMT46	7	NYC DEP idling database; public enforcement record
14878MP	6	NYC DEP idling database; public enforcement record
14889MP	6	NYC DEP idling database; public enforcement record
14931MP	6	NYC DEP idling database; public enforcement record
14942MP	6	NYC DEP idling database; public enforcement record
15020MP	6	NYC DEP idling database; public enforcement record
16531MP	6	NYC DEP idling database; public enforcement record
24562ND	6	NYC DEP idling database; public enforcement record
26099NA	6	NYC DEP idling database; public enforcement record
26117NA	6	NYC DEP idling database; public enforcement record
26477NA	6	NYC DEP idling database; public enforcement record
26971NA	6	NYC DEP idling database; public enforcement record
27244NA	6	NYC DEP idling database; public enforcement record
29183MN	6	NYC DEP idling database; public enforcement record
3169640	6	NYC DEP idling database; public enforcement record
3206305	6	NYC DEP idling database; public enforcement record

3211975	6	NYC DEP idling database; public enforcement record
34028NB	6	NYC DEP idling database; public enforcement record
50708MN	6	NYC DEP idling database; public enforcement record
58353NA	6	NYC DEP idling database; public enforcement record
67921ND	6	NYC DEP idling database; public enforcement record
71777MN	6	NYC DEP idling database; public enforcement record
76381MM	6	NYC DEP idling database; public enforcement record
77074MN	6	NYC DEP idling database; public enforcement record
86336MM	6	NYC DEP idling database; public enforcement record
99386NA	6	NYC DEP idling database; public enforcement record
E14NBM	6	NYC DEP idling database; public enforcement record
QEGB74	6	NYC DEP idling database; public enforcement record
XJLP89	6	NYC DEP idling database; public enforcement record
XJXU13	6	NYC DEP idling database; public enforcement record
XKMU74	6	NYC DEP idling database; public enforcement record
XKPS68	6	NYC DEP idling database; public enforcement record
XKZE20	6	NYC DEP idling database; public enforcement record
XKZE30	6	NYC DEP idling database; public enforcement record
XKZE34	6	NYC DEP idling database; public enforcement record
XLKF69	6	NYC DEP idling database; public enforcement record
XLTN77	6	NYC DEP idling database; public enforcement record
XMBF73	6	NYC DEP idling database; public enforcement record
XNAX52	6	NYC DEP idling database; public enforcement record
XNHR88	6	NYC DEP idling database; public enforcement record
XPJV69	6	NYC DEP idling database; public enforcement record
XRMV57	6	NYC DEP idling database; public enforcement record
14922MP	5	NYC DEP idling database; public enforcement record
14965MP	5	NYC DEP idling database; public enforcement record
14967MP	5	NYC DEP idling database; public enforcement record
26127NA	5	NYC DEP idling database; public enforcement record
26214NA	5	NYC DEP idling database; public enforcement record
26224NA	5	NYC DEP idling database; public enforcement record
26276NA	5	NYC DEP idling database; public enforcement record
26538NA	5	NYC DEP idling database; public enforcement record
26973NA	5	NYC DEP idling database; public enforcement record
27230NA	5	NYC DEP idling database; public enforcement record
29144MN	5	NYC DEP idling database; public enforcement record
29746NC	5	NYC DEP idling database; public enforcement record
3068245	5	NYC DEP idling database; public enforcement record
31099NC	5	NYC DEP idling database; public enforcement record
3217622	5	NYC DEP idling database; public enforcement record
3299465	5	NYC DEP idling database; public enforcement record
3354724	5	NYC DEP idling database; public enforcement record
33994NC	5	NYC DEP idling database; public enforcement record
35699NA	5	NYC DEP idling database; public enforcement record
423NRF	5	NYC DEP idling database; public enforcement record
50700MN	5	NYC DEP idling database; public enforcement record
58062NA	5	NYC DEP idling database; public enforcement record
59046NA	5	NYC DEP idling database; public enforcement record
59BTQZ	5	NYC DEP idling database; public enforcement record
60243NB	5	NYC DEP idling database; public enforcement record

73383NC	5	NYC DEP idling database; public enforcement record
75AUZD	5	NYC DEP idling database; public enforcement record
76383MM	5	NYC DEP idling database; public enforcement record
81057MN	5	NYC DEP idling database; public enforcement record
82102ND	5	NYC DEP idling database; public enforcement record
82615NA	5	NYC DEP idling database; public enforcement record
85165NB	5	NYC DEP idling database; public enforcement record
86332MM	5	NYC DEP idling database; public enforcement record
86335MM	5	NYC DEP idling database; public enforcement record
99973MN	5	NYC DEP idling database; public enforcement record
BYUZ08	5	NYC DEP idling database; public enforcement record
E13NBM	5	NYC DEP idling database; public enforcement record
E15NBM	5	NYC DEP idling database; public enforcement record
QEFS36	5	NYC DEP idling database; public enforcement record
QEFS39	5	NYC DEP idling database; public enforcement record
QEHF75	5	NYC DEP idling database; public enforcement record
QIAA78	5	NYC DEP idling database; public enforcement record
QIAM57	5	NYC DEP idling database; public enforcement record
RCY0478	5	NYC DEP idling database; public enforcement record
XHJS30	5	NYC DEP idling database; public enforcement record
XJHL97	5	NYC DEP idling database; public enforcement record
XJNJ28	5	NYC DEP idling database; public enforcement record
XJXU48	5	NYC DEP idling database; public enforcement record
XKPS71	5	NYC DEP idling database; public enforcement record
XKZE35	5	NYC DEP idling database; public enforcement record
XLES99	5	NYC DEP idling database; public enforcement record
XLGL59	5	NYC DEP idling database; public enforcement record
XLGP30	5	NYC DEP idling database; public enforcement record
XLJV11	5	NYC DEP idling database; public enforcement record
XLKF65	5	NYC DEP idling database; public enforcement record
XLKF67	5	NYC DEP idling database; public enforcement record
XLMT97	5	NYC DEP idling database; public enforcement record
XLMV78	5	NYC DEP idling database; public enforcement record
XLWS79	5	NYC DEP idling database; public enforcement record
XMFS69	5	NYC DEP idling database; public enforcement record
XNMX94	5	NYC DEP idling database; public enforcement record
XPDL29	5	NYC DEP idling database; public enforcement record
XPEA88	5	NYC DEP idling database; public enforcement record
XPEA96	5	NYC DEP idling database; public enforcement record
13357NB	4	NYC DEP idling database; public enforcement record
14885MP	4	NYC DEP idling database; public enforcement record
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14947MP	4	NYC DEP idling database; public enforcement record
14953MP	4	NYC DEP idling database; public enforcement record
16536MP	4	NYC DEP idling database; public enforcement record
16539MP	4	NYC DEP idling database; public enforcement record
16546MP	4	NYC DEP idling database; public enforcement record

23646ND	4	NYC DEP idling database; public enforcement record
26092NA	4	NYC DEP idling database; public enforcement record
26115NA	4	NYC DEP idling database; public enforcement record
26128NA	4	NYC DEP idling database; public enforcement record
26136NA	4	NYC DEP idling database; public enforcement record
26522NA	4	NYC DEP idling database; public enforcement record
27750CP	4	NYC DEP idling database; public enforcement record
29127MN	4	NYC DEP idling database; public enforcement record
31865NC	4	NYC DEP idling database; public enforcement record
3337720	4	NYC DEP idling database; public enforcement record
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3565161	4	NYC DEP idling database; public enforcement record
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50744MN	4	NYC DEP idling database; public enforcement record
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53076NB	4	NYC DEP idling database; public enforcement record
54AVAC	4	NYC DEP idling database; public enforcement record
58067NA	4	NYC DEP idling database; public enforcement record
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58401NA	4	NYC DEP idling database; public enforcement record
59042NA	4	NYC DEP idling database; public enforcement record
67637MN	4	NYC DEP idling database; public enforcement record
68564NE	4	NYC DEP idling database; public enforcement record
68945ND	4	NYC DEP idling database; public enforcement record
71769MN	4	NYC DEP idling database; public enforcement record
71779MN	4	NYC DEP idling database; public enforcement record
71788MN	4	NYC DEP idling database; public enforcement record
71789MN	4	NYC DEP idling database; public enforcement record
73BKAT	4	NYC DEP idling database; public enforcement record
762NTN	4	NYC DEP idling database; public enforcement record
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XKZE42	4	NYC DEP idling database; public enforcement record

XKZE50	4	NYC DEP idling database; public enforcement record
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XLET14	4	NYC DEP idling database; public enforcement record
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21729NE	3	NYC DEP idling database; public enforcement record
23BTQS	3	NYC DEP idling database; public enforcement record
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68AUZD	3	NYC DEP idling database; public enforcement record
715NTN	3	NYC DEP idling database; public enforcement record
71768MN	3	NYC DEP idling database; public enforcement record
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74456NA	3	NYC DEP idling database; public enforcement record
75523NB	3	NYC DEP idling database; public enforcement record
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76387MM	3	NYC DEP idling database; public enforcement record
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XMFT28	3	NYC DEP idling database; public enforcement record
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58184NA	2	NYC DEP idling database; public enforcement record
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AM80577	2	NYC DEP idling database; public enforcement record
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QIAM23	2	NYC DEP idling database; public enforcement record
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QLRD41	2	NYC DEP idling database; public enforcement record
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RRV5178	2	NYC DEP idling database; public enforcement record
XGCG30	2	NYC DEP idling database; public enforcement record
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XLIM73	2	NYC DEP idling database; public enforcement record
XLJU70	2	NYC DEP idling database; public enforcement record
XLJV39	2	NYC DEP idling database; public enforcement record
XLJV40	2	NYC DEP idling database; public enforcement record
XLJW72	2	NYC DEP idling database; public enforcement record
XLJW96	2	NYC DEP idling database; public enforcement record
XLJX88	2	NYC DEP idling database; public enforcement record
XLJY22	2	NYC DEP idling database; public enforcement record
XLKF76	2	NYC DEP idling database; public enforcement record

XLKM70	2	NYC DEP idling database; public enforcement record
XLKP25	2	NYC DEP idling database; public enforcement record
XLKS44	2	NYC DEP idling database; public enforcement record
XLLD60	2	NYC DEP idling database; public enforcement record
XLLD84	2	NYC DEP idling database; public enforcement record
XLLF74	2	NYC DEP idling database; public enforcement record
XLPY18	2	NYC DEP idling database; public enforcement record
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XLRA45	2	NYC DEP idling database; public enforcement record
XLUV95	2	NYC DEP idling database; public enforcement record
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XLXV88	2	NYC DEP idling database; public enforcement record
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XMCH89	2	NYC DEP idling database; public enforcement record
XMFS81	2	NYC DEP idling database; public enforcement record
XMFT25	2	NYC DEP idling database; public enforcement record
XMJU91	2	NYC DEP idling database; public enforcement record
XMKA44	2	NYC DEP idling database; public enforcement record
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XPDK78	2	NYC DEP idling database; public enforcement record
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XPSM75	2	NYC DEP idling database; public enforcement record
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Z070595	2	NYC DEP idling database; public enforcement record
Z070637	2	NYC DEP idling database; public enforcement record
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99968MN	1	NYC DEP idling database; public enforcement record
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DA23954	1	NYC DEP idling database; public enforcement record
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F86LSX	1	NYC DEP idling database; public enforcement record
H79RJN	1	NYC DEP idling database; public enforcement record
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MLV5385	1	NYC DEP idling database; public enforcement record
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NFXL05	1	NYC DEP idling database; public enforcement record
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P63RKU	1	NYC DEP idling database; public enforcement record
PMQ1677	1	NYC DEP idling database; public enforcement record
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QEHF95	1	NYC DEP idling database; public enforcement record
QEHJ48	1	NYC DEP idling database; public enforcement record
QEHJ49	1	NYC DEP idling database; public enforcement record
QIAA62	1	NYC DEP idling database; public enforcement record
QIAA79	1	NYC DEP idling database; public enforcement record
QIAE11	1	NYC DEP idling database; public enforcement record
QIAJ58	1	NYC DEP idling database; public enforcement record
QIAJ59	1	NYC DEP idling database; public enforcement record
QIAM14	1	NYC DEP idling database; public enforcement record
QIAM18	1	NYC DEP idling database; public enforcement record
QIAM27	1	NYC DEP idling database; public enforcement record
QLRD86	1	NYC DEP idling database; public enforcement record
QNYJ16	1	NYC DEP idling database; public enforcement record
QXXW25	1	NYC DEP idling database; public enforcement record
RWIP10	1	NYC DEP idling database; public enforcement record
RWIP12	1	NYC DEP idling database; public enforcement record
RYDER870712	1	NYC DEP idling database; public enforcement record
S69PVS	1	NYC DEP idling database; public enforcement record
V46NPZ	1	NYC DEP idling database; public enforcement record
V52NPZ	1	NYC DEP idling database; public enforcement record
W51860	1	NYC DEP idling database; public enforcement record
XCKH38	1	NYC DEP idling database; public enforcement record
XDHD90	1	NYC DEP idling database; public enforcement record
XFLK31	1	NYC DEP idling database; public enforcement record
XFUK91	1	NYC DEP idling database; public enforcement record
XFUT23	1	NYC DEP idling database; public enforcement record
XFUT24	1	NYC DEP idling database; public enforcement record
XGBX24	1	NYC DEP idling database; public enforcement record
XGKG99	1	NYC DEP idling database; public enforcement record
XGLS48	1	NYC DEP idling database; public enforcement record
XGLS51	1	NYC DEP idling database; public enforcement record
XGLT97	1	NYC DEP idling database; public enforcement record
XGLT99	1	NYC DEP idling database; public enforcement record
XGLY55	1	NYC DEP idling database; public enforcement record
XGPV39	1	NYC DEP idling database; public enforcement record
XGPY81	1	NYC DEP idling database; public enforcement record
XGZS34	1	NYC DEP idling database; public enforcement record
XHF097	1	NYC DEP idling database; public enforcement record
XHHA42	1	NYC DEP idling database; public enforcement record
XHHZ86	1	NYC DEP idling database; public enforcement record
XHJT34	1	NYC DEP idling database; public enforcement record
XHKV94	1	NYC DEP idling database; public enforcement record
XHMK10	1	NYC DEP idling database; public enforcement record
XHMK13	1	NYC DEP idling database; public enforcement record
XHMW96	1	NYC DEP idling database; public enforcement record
XHMW97	1	NYC DEP idling database; public enforcement record
XHNW46	1	NYC DEP idling database; public enforcement record
XHVT17	1	NYC DEP idling database; public enforcement record

XHXD74	1	NYC DEP idling database; public enforcement record
XHXD76	1	NYC DEP idling database; public enforcement record
XHXE12	1	NYC DEP idling database; public enforcement record
XHXE14	1	NYC DEP idling database; public enforcement record
XHXE24	1	NYC DEP idling database; public enforcement record
XHXE33	1	NYC DEP idling database; public enforcement record
XHXL85	1	NYC DEP idling database; public enforcement record
XHXL86	1	NYC DEP idling database; public enforcement record
XJNP67	1	NYC DEP idling database; public enforcement record
XJUT64	1	NYC DEP idling database; public enforcement record
XJUU74	1	NYC DEP idling database; public enforcement record
XJUV43	1	NYC DEP idling database; public enforcement record
XJUV64	1	NYC DEP idling database; public enforcement record
XJUV65	1	NYC DEP idling database; public enforcement record
XJUV66	1	NYC DEP idling database; public enforcement record
XJXU37	1	NYC DEP idling database; public enforcement record
XJXW19	1	NYC DEP idling database; public enforcement record
XJXW35	1	NYC DEP idling database; public enforcement record
XJZM19	1	NYC DEP idling database; public enforcement record
XK7E30	1	NYC DEP idling database; public enforcement record
XKAV33	1	NYC DEP idling database; public enforcement record
XKCG57	1	NYC DEP idling database; public enforcement record
XKCG59	1	NYC DEP idling database; public enforcement record
XKJC18	1	NYC DEP idling database; public enforcement record
XKCK28	1	NYC DEP idling database; public enforcement record
XKEY66	1	NYC DEP idling database; public enforcement record
XKEY67	1	NYC DEP idling database; public enforcement record
XKEY69	1	NYC DEP idling database; public enforcement record
XKFF63	1	NYC DEP idling database; public enforcement record
XKFF64	1	NYC DEP idling database; public enforcement record
XKHJ24	1	NYC DEP idling database; public enforcement record
XKHW24	1	NYC DEP idling database; public enforcement record
XKHW32	1	NYC DEP idling database; public enforcement record
XKJA14	1	NYC DEP idling database; public enforcement record
XKJA67	1	NYC DEP idling database; public enforcement record
XKJC77	1	NYC DEP idling database; public enforcement record
XKJD60	1	NYC DEP idling database; public enforcement record
XKJF97	1	NYC DEP idling database; public enforcement record
XKJG28	1	NYC DEP idling database; public enforcement record
XKJZ68	1	NYC DEP idling database; public enforcement record
XKLM95	1	NYC DEP idling database; public enforcement record
XKMN23	1	NYC DEP idling database; public enforcement record
XKNL31	1	NYC DEP idling database; public enforcement record
XKP498	1	NYC DEP idling database; public enforcement record
XKPR99	1	NYC DEP idling database; public enforcement record
XKPS20	1	NYC DEP idling database; public enforcement record
XKPT37	1	NYC DEP idling database; public enforcement record
XKPV11	1	NYC DEP idling database; public enforcement record
XKPV40	1	NYC DEP idling database; public enforcement record
XKTZ76	1	NYC DEP idling database; public enforcement record
XKU825	1	NYC DEP idling database; public enforcement record

XLUU33	1	NYC DEP idling database; public enforcement record
XLWS12	1	NYC DEP idling database; public enforcement record
XLWS67	1	NYC DEP idling database; public enforcement record
XLWS69	1	NYC DEP idling database; public enforcement record
XLWS80	1	NYC DEP idling database; public enforcement record
XLWU42	1	NYC DEP idling database; public enforcement record
XLXF73	1	NYC DEP idling database; public enforcement record
XLXZ66	1	NYC DEP idling database; public enforcement record
XLYN17	1	NYC DEP idling database; public enforcement record
XLYN18	1	NYC DEP idling database; public enforcement record
XMBE34	1	NYC DEP idling database; public enforcement record
XMBF56	1	NYC DEP idling database; public enforcement record
XMBF84	1	NYC DEP idling database; public enforcement record
XMBG46	1	NYC DEP idling database; public enforcement record
XMBG50	1	NYC DEP idling database; public enforcement record
XMBJ59	1	NYC DEP idling database; public enforcement record
XMFS80	1	NYC DEP idling database; public enforcement record
XMFT13	1	NYC DEP idling database; public enforcement record
XMGA57	1	NYC DEP idling database; public enforcement record
XMJT22	1	NYC DEP idling database; public enforcement record
XMJV24	1	NYC DEP idling database; public enforcement record
XMKA86	1	NYC DEP idling database; public enforcement record
XMKC18	1	NYC DEP idling database; public enforcement record
XMPW49	1	NYC DEP idling database; public enforcement record
XMPX32	1	NYC DEP idling database; public enforcement record
XMTT11	1	NYC DEP idling database; public enforcement record
XMTT44	1	NYC DEP idling database; public enforcement record
XMTT58	1	NYC DEP idling database; public enforcement record
XMTU25	1	NYC DEP idling database; public enforcement record
XNBD82	1	NYC DEP idling database; public enforcement record
XNCJ50	1	NYC DEP idling database; public enforcement record
XNCP94	1	NYC DEP idling database; public enforcement record
XNCZ56	1	NYC DEP idling database; public enforcement record
XNDA40	1	NYC DEP idling database; public enforcement record
XNDA73	1	NYC DEP idling database; public enforcement record
XNEK76	1	NYC DEP idling database; public enforcement record
XNEK81	1	NYC DEP idling database; public enforcement record
XNEK87	1	NYC DEP idling database; public enforcement record
XNHM34	1	NYC DEP idling database; public enforcement record
XNHR38	1	NYC DEP idling database; public enforcement record
XNKJ77	1	NYC DEP idling database; public enforcement record
XNL735	1	NYC DEP idling database; public enforcement record
XNMX95	1	NYC DEP idling database; public enforcement record
XNPW15	1	NYC DEP idling database; public enforcement record
XNTY32	1	NYC DEP idling database; public enforcement record
XNUJ32	1	NYC DEP idling database; public enforcement record
XNVZ74	1	NYC DEP idling database; public enforcement record
XNVZ77	1	NYC DEP idling database; public enforcement record
XNVZ78	1	NYC DEP idling database; public enforcement record
XNVZ79	1	NYC DEP idling database; public enforcement record
XNWA92	1	NYC DEP idling database; public enforcement record

XNWA94	1	NYC DEP idling database; public enforcement record
XNWB82	1	NYC DEP idling database; public enforcement record
XNWC85	1	NYC DEP idling database; public enforcement record
XNWE22	1	NYC DEP idling database; public enforcement record
XNWL88	1	NYC DEP idling database; public enforcement record
XNWL94	1	NYC DEP idling database; public enforcement record
XNWM16	1	NYC DEP idling database; public enforcement record
XNWM34	1	NYC DEP idling database; public enforcement record
XNYY25	1	NYC DEP idling database; public enforcement record
XNYY32	1	NYC DEP idling database; public enforcement record
XPDK79	1	NYC DEP idling database; public enforcement record
XPDL12	1	NYC DEP idling database; public enforcement record
XPDZ50	1	NYC DEP idling database; public enforcement record
XPDZ53	1	NYC DEP idling database; public enforcement record
XPEA34	1	NYC DEP idling database; public enforcement record
XPEA75	1	NYC DEP idling database; public enforcement record
XPEA78	1	NYC DEP idling database; public enforcement record
XRKS49	1	NYC DEP idling database; public enforcement record
XXZE18	1	NYC DEP idling database; public enforcement record
Y140503	1	NYC DEP idling database; public enforcement record
Y17LMV	1	NYC DEP idling database; public enforcement record
Z070574	1	NYC DEP idling database; public enforcement record
Z070591	1	NYC DEP idling database; public enforcement record
Z070598	1	NYC DEP idling database; public enforcement record
ZMG0184	1	NYC DEP idling database; public enforcement record
ZNL4921	1	NYC DEP idling database; public enforcement record
ZRD8838	1	NYC DEP idling database; public enforcement record
ZWC2818	1	NYC DEP idling database; public enforcement record
ZYG8789	1	NYC DEP idling database; public enforcement record

Chart A — E-Commerce Cohort vs. Legacy Fleet Citation Growth (FY2014–FY2025)

Source: NYC Open Data, DOF Parking Violations Issued FY2014–FY2025, queried via Socrata API. COM plates, VAN+DELV body types, 25 safety-entailed violation codes. All figures from complete server-side aggregation (no row-limit truncation). E-Cohort = Ford Transit + Mercedes-Benz Sprinter + Ram/Dodge ProMaster + Rivian EDV. Legacy = Freightliner/Freuehauf + Workhorse + International + Hino + Isuzu. Index: FY2014 = 100.

Fiscal Year	E-Commerce Cohort	Legacy Fleet	All COM Van+Delv	E-Cohort Index (FY2014=100)	Legacy Index (FY2014=100)	All COM V+D Index (FY2014=100)	Key Event
FY2014	140,356	261,748	668,553	100.0	100.0	100.0	Baseline (partial year Aug 2013–Jun 2014)
FY2015	190,309	389,823	881,821	135.6	148.9	131.9	Ford Transit U.S. launch (2014 model year)
FY2016	194,794	369,779	809,159	138.8	141.3	121.1	
FY2017	208,608	374,586	804,225	148.6	143.1	120.3	
FY2018	234,633	440,605	875,047	167.2	168.3	130.9	Amazon DSP program launches
FY2019	238,308	457,099	866,661	169.8	174.6	129.6	FedEx ends Amazon contract (Jun 2019)
FY2020	245,070	397,100	782,548	174.6	151.7	117.1	COVID-19 emergency; enforcement suspended Mar–Jun 2020
FY2021	271,326	378,469	783,946	193.3	144.6	117.2	Amazon surpasses UPS in U.S. parcel volume
FY2022	250,574	288,890	649,556	178.5	110.4	97.2	Rivian EDV NYC deployment begins
FY2023	308,674	319,789	748,362	219.9	122.2	111.9	Peak year; Amazon surpasses FedEx + UPS combined
FY2024	235,547	229,880	553,428	167.8	87.8	82.8	
FY2025	242,080	238,064	566,646	172.5	91.0	84.8	NYC congestion pricing launches Jan 2025 (PRELIMINARY)

PERCENT CHANGE SUMMARY			
Period	E-Cohort %	Legacy %	All COM V+D %
FY2014 → FY2015	72.5%	-9.0%	-15.2%
FY2014 → FY2018	119.9%	22.2%	11.9%
FY2018 → FY2025	3.2%	-46.0%	-35.2%

MAKE-LEVEL CITATION DATA (individual makes within cohorts)															
Make / Series	Cohort	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	FY2021	FY2022	FY2023	FY2024	FY2025		
Ford (Transit)	E-Commerce	113,910	150,870	150,746	158,070	177,918	181,352	186,513	202,021	181,253	224,125	172,165	178,466		
Mercedes-Benz (Sprinter)	E-Commerce	4,089	6,962	11,578	18,256	28,000	28,899	28,660	32,953	29,950	38,744	30,187	32,235		
Ram/Dodge (ProMaster)	E-Commerce	22,357	32,477	32,470	32,282	28,715	28,057	29,897	36,352	39,371	45,541	31,229	26,957		
Rivian (EDV)	E-Commerce	—	—	—	—	—	—	—	—	—	264	1,966	4,422		
Freightliner/Freuehauf	Legacy	88,254	155,870	167,990	178,159	210,255	222,571	198,767	209,698	155,486	180,244	135,899	136,840		
Workhorse	Legacy	33,439	45,594	41,029	36,847	41,292	35,832	30,714	28,319	18,599	18,528	11,792	10,282		
International	Legacy	100,121	130,235	104,710	96,709	109,232	103,855	75,706	59,727	45,688	42,753	24,399	21,650		
Hino	Legacy	17,077	24,913	23,979	28,478	38,140	41,858	39,696	35,664	30,050	32,429	23,262	27,905		
Isuzu	Legacy	22,857	33,211	32,071	34,393	41,686	52,983	52,217	45,061	39,067	45,835	34,528	41,387		

Chart B — E-Commerce Cohort Geographic Migration by Borough (FY2014–FY2025)

Source: NYC Open Data, DOF Parking Violations Issued FY2014–FY2025, Socrata API. Same filters as Chart A (COM plates, VAN+DEL V, 25 safety-entailed codes, e-cohort makes). Borough from violation_county field. Outer Boroughs = Brooklyn + Queens + Bronx + Staten Island.

PART A — Raw Citation Counts by Borough

Fiscal Year	Manhattan	Brooklyn	Queens	Bronx	Staten Island	Outer Boros Total	Key Event
FY2014	99,368	13,621	11,204	6,540	179	31,544	
FY2015	125,619	15,252	14,285	9,967	186	39,690	
FY2016	129,227	15,933	14,866	8,898	254	39,951	
FY2017	140,323	27,492	24,922	13,011	1,463	66,888	DSP launch; outer borough jump begins
FY2018	157,127	29,901	27,548	17,569	1,365	76,383	Amazon DSP program launches
FY2019	157,154	29,050	29,458	20,067	1,727	80,302	
FY2020	146,689	33,394	36,621	24,912	2,461	97,388	COVID surge; residential delivery expands
FY2021	166,169	32,810	38,990	29,819	3,253	104,872	Amazon surpasses UPS in U.S. volume
FY2022	144,376	31,275	46,083	25,187	3,445	105,990	Rivian EDV deployment begins
FY2023	168,377	41,764	60,674	29,985	4,126	136,549	Queens +302% vs FY2014
FY2024	125,697	29,221	50,732	21,068	3,259	104,280	
FY2025	141,142	30,150	45,024	17,672	3,163	96,009	PRELIMINARY

PART B — Borough Share as % of Annual E-Cohort Total

Fiscal Year	Manhattan %	Brooklyn %	Queens %	Bronx %	Staten Island %	Outer Boros %
FY2014	70.8%	9.7%	8.0%	4.7%	0.1%	22.5%
FY2015	66.0%	8.0%	7.5%	5.2%	0.1%	20.9%
FY2016	66.3%	8.2%	7.6%	4.6%	0.1%	20.5%
FY2017	67.3%	13.2%	11.9%	6.2%	0.7%	32.1%
FY2018	67.0%	12.7%	11.7%	7.5%	0.6%	32.6%
FY2019	65.9%	12.2%	12.4%	8.4%	0.7%	33.7%
FY2020	59.9%	13.6%	14.9%	10.2%	1.0%	39.7%
FY2021	61.2%	12.1%	14.4%	11.0%	1.2%	38.7%
FY2022	57.6%	12.5%	18.4%	10.1%	1.4%	42.3%
FY2023	54.5%	13.5%	19.7%	9.7%	1.3%	44.2%
FY2024	53.4%	12.4%	21.5%	8.9%	1.4%	44.3%
FY2025	58.3%	12.5%	18.6%	7.3%	1.3%	39.7%

PERIOD COMPARISON SUMMARY — Baseline FY2014–2016 vs. Current FY2023–2025

Borough	FY2014–16 Baseline Avg	FY2023–25 Current Avg	% Change
Manhattan	118,071	145,072	+22.9%
Brooklyn	14,935	33,712	+125.7%
Queens	13,452	52,143	+287.6%
Bronx	8,468	22,908	+170.5%
Staten Island	206	3,516	+1604.0%
Outer Boros T	37,062	112,279	+203.0%

Chart C — E-Commerce Cohort: Actual Citations vs. Estimated True Safety Violations (FY2014–FY2025)

ENFORCEMENT RATE MULTIPLIER ASSUMPTIONS					
Multiplier	Ticket Rate	Full Citation	Interpretation		
9x (Conservative)	11.21% ticket rate	Arnav, B. & Ensari, E., "Eye in the Sky: Harnessing AI to Monitor Police Response to Illegal Parking Complaints," Cities (2024). DOI: 10.2139/ssrn.4974275. Citywide 311-complaint ticket issuance rate.			
33x (Mid-Range)	2.87–3.00% ticket rate	Arnav & Ensari (2024) safety-specific violation rate (2.87%) converges with Restler (2025) field survey, Downtown Brooklyn, May–Jun 2025 (~3%). PIX11/amNewYork, https://pix11.com/news/local-news/new-york-city-isnt-handing-out-enough-parking-tickets-council-member/			
53x (Liberal)	1.9% ticket rate	Arnav (2023). NYPD tickets fewer than 1.9% of blocked bike lane complaints. https://nyc.streetsblog.org/2023/04/06/nypd-tickets-fewer-than-2-of-blocked-bike-lane-complaints-analysis			
ANNUAL CITATION AND VIOLATION ESTIMATES					
Fiscal Year	Actual Citations (E-Cohort)	9x Conservative (11.21% rate)	33x Mid-Range ★ (2.87–3% rate)	53x Liberal (1.9% rate)	Key Event
FY2014	140,356	1,263,204	4,631,748	7,438,868	
FY2015	190,309	1,712,781	6,280,197	10,086,377	
FY2016	194,794	1,753,146	6,428,202	10,324,082	
FY2017	208,608	1,877,472	6,884,064	11,056,224	
FY2018	234,633	2,111,697	7,742,889	12,435,549	Amazon DSP program launches
FY2019	238,308	2,144,772	7,864,164	12,630,324	
FY2020	245,070	2,205,630	8,087,310	12,988,710	COVID surge; enforcement suspended Mar–Jun
FY2021	271,326	2,441,934	8,953,758	14,380,278	
FY2022	250,574	2,255,166	8,268,942	13,280,422	Rivian EDV deployment begins
FY2023	308,674	2,778,066	10,186,242	16,359,722	Peak year
FY2024	235,547	2,119,923	7,773,051	12,483,991	
FY2025	242,080	2,178,720	7,988,640	12,830,240	PRELIMINARY
5-YEAR TOTALS (FY2021–FY2025) AND ANNUAL AVERAGES					
	Actual Citations	9x Conservative	33x Mid-Range ★	53x Liberal	
FY2021–2025	1,308,201	11,773,809	43,170,633	69,334,653	
Annual Average	261,640	2,354,762	8,634,127	13,866,931	

NOTE: All violation estimates are floors, not ceilings. Automated camera citations are included in the base citation count; because cameras detect violations at approximately 10x the officer rate, including them slightly understates true violations on non-camera-patrolled blocks. Legally-permitted commercial double-parking under 34 RCNY §4-08(f)(1) creates identical physical hazards but generates no citation and appears in no enforcement dataset.

Proxy Fleet Table 1 — Active Plates and Total Citations by Fiscal Year (FY2021–FY2025)

Source: NYC Open Data DOF Parking Violations Issued FY2021–FY2025, queried via Socrata API against all 25 safety-entailed codes. Plates matched against 1,553-plate proxy fleet index. 5-year total of 637 unique plates received at least one citation; 916 returned zero citations.

Fiscal Year	Active Plates (Cited)	% of 1,553-Plate Index	Citations (All 25 Codes)	Avg Citations / Active Plate
FY2021	377	24.3%	2,688	7.1
FY2022	488	31.4%	3,524	7.2
FY2023	555	35.7%	4,261	7.7
FY2024	518	33.4%	2,954	5.7
FY2025	376	24.2%	1,663	4.4
5-Year Total	637	41.0%	15,090	
Annual Average			3,018	

NOTE: 916 of the 1,553 index plates returned zero citations across all 25 codes and all five years. Absence of citation does not establish legal compliance, given documented enforcement rates of 1.9–11%. Active plate count = plates receiving ≥ 1 citation in that fiscal year.

Proxy Fleet Table 2 — Citations by Violation Code by Fiscal Year (FY2021–FY2025)

Source: proxy_fleet_results.csv — plate-level citation data queried from NYC Open Data via Socrata API and aggregated by violation code. Officer-issued codes listed first by 5-year volume; camera codes (●) listed separately. Five codes returned zero citations for this fleet (shown with —).

Code	Violation Description	FY2021	FY2022	FY2023	FY2024	FY2025	5-Yr Total	Camera?
14	No Standing — Day/Time Limits	420	558	880	522	316	2,696	
40	Fire Hydrant	412	558	618	403	192	2,183	
19	No Standing — Bus Stop	416	452	622	427	171	2,088	
46	Double Parking	504	312	418	283	128	1,645	
48	Bike Lane	207	190	251	139	119	906	
50	Crosswalk	65	80	100	89	23	357	
10	No Stopping — Day/Time Limits	20	34	68	24	19	165	
18	No Standing — Bus Lane	20	13	29	31	7	100	
53	Safety Zone	25	21	22	19	13	100	
47	Double Parking — Midtown Commercial	22	17	19	5	11	74	
51	Sidewalk	12	10	11	4	10	47	
9	Obstructing Traffic / Intersection	1	2	3	2	0	8	
67	Pedestrian Ramp	0	1	4	2	0	7	
45	Traffic Lane	1	1	2	1	1	6	
98	Obstructing Driveway	0	2	0	1	1	4	
52	Blocking Intersection	1	0	0	0	0	1	
49	Excavation — Vehicle Obstructs Traffic	—	—	—	—	—	—	
54	Pickup/Discharge in Prohibited Zone	—	—	—	—	—	—	
55	Elevated/Divided Highway/Tunnel	—	—	—	—	—	—	
59	Angle Parking — Commercial Vehicle	—	—	—	—	—	—	
89	No Standing (Exc Trucks/Garment Dist)	—	—	—	—	—	—	
36	School Zone Speed (Camera)	277	756	632	454	198	2,317	●
5	Bus Lane Violation (Camera)	72	182	310	242	174	980	●
7	Failure to Stop at Red Light (Camera)	188	306	148	75	42	759	●
12	Mobile Bus Lane Violation (Camera)	25	29	124	231	238	647	●
TOTAL		2,688	3,524	4,261	2,954	1,663	15,090	

Proxy Fleet Table 3 — Scaled Fleet: Estimated Annual Citations

SCALING METHODOLOGY

Scale Multiplier = Assumed Daily Fleet Size ÷ 637 (proxy plates receiving ≥ 1 citation in FY2021–FY2025). Scaled Annual Citations = Scale Multiplier × 3,018 (annual average citations from Table 1). Scaled 5-Year Citations = Scale Multiplier × 15,090 (5-year total from Table 1). ★ Market Share estimate (3,077 vehicles) is the PRIMARY ESTIMATE; others are sensitivity scenarios. Market share basis: NYC Comptroller (2025) package-volume data, eMarketer e-commerce share, industry-standard productivity of 300–350 packages per vehicle per shift.

Fleet Assumption	Assumed Daily Vehicles	Scale Multiplier (÷ 637 cited plates)	Scaled Annual Citations	Scaled 5-Year Citations
Conservative	2,000	3.14x	9,476	47,378
Market Share ★	3,077	4.83x	14,578	72,892
Moderate	4,000	6.28x	18,951	94,757
Aggressive	5,000	7.85x	23,689	118,446

Source for market share fleet estimate: NYC Comptroller, 'Fast Shipping. Slow Justice.' (November 2025), <https://comptroller.nyc.gov/newsroom/growth-of-e-commerce-exacerbated-traffic-crashes-pollution-and-workplace-injuries-comptroller-lander-reports/>; eMarketer e-commerce share data; industry-standard van productivity benchmarks.

Proxy Fleet Table 4 — Scaled Fleet: Estimated True Annual Violations

ENFORCEMENT MULTIPLIER SOURCES (see also ChartC_ViolEst tab)

9x: Arnav, B. & Ensari, E., 'Eye in the Sky: Harnessing AI to Monitor Police Response to Illegal Parking Complaints,' Cities (2024), DOI: 10.2139/ssrn.4974275. Citywide 311-complaint ticket issuance rate = 11.21%.

33x ★: Arnav & Ensari (2024) safety-specific rate (2.87%) and Restler (2025) Downtown Brooklyn field survey (~3%). PIX11/amNewYork (May–Jun 2025), <https://pix11.com/news/local-news/new-york-city-isnt-handing-out-enough-parking-tickets-council-member/>. PRIMARY ESTIMATE.

53x: Arnav (2023), bike lane complaint ticket rate <1.9%. Streetsblog NYC, <https://nyc.streetsblog.org/2023/04/06/nypd-tickets-fewer-than-2-of-blocked-bike-lane-complaints-analysis>

Fleet Assumption	Scaled Annual Citations	9x Estimate (11.21% rate)	33x Estimate ★ (2.87–3% rate)	53x Estimate (1.9% rate)
Conservative (2,000)	9,476	85,284	312,708	502,228
Market Share (3,077) ★	14,578	131,202	481,074	772,634
Moderate (4,000)	18,951	170,559	625,383	1,004,403
Aggressive (5,000)	23,689	213,201	781,737	1,255,517

All figures are floors, not ceilings. Legally-permitted commercial double-parking under 34 RCNY §4-08(f)(1) creates identical physical hazards but generates no citation and is captured in no enforcement dataset.

All Make Series — COM VAN+DELV Safety Citations FY2014–FY2025 (Socrata API, server-side aggregation)														
Make / Series	Cohort	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	FY2021	FY2022	FY2023	FY2024	FY2025	FY2014→FY2025 % Change
Ford (Transit)	E-Commerce	113,910	150,870	150,746	158,070	177,918	181,352	186,513	202,021	181,253	224,125	172,165	178,466	+56.7%
Mercedes-Benz (Sprinter)	E-Commerce	4,089	6,962	11,578	18,256	28,000	28,899	28,660	32,953	29,950	38,744	30,187	32,235	+688.3%
Ram/Dodge (ProMaster)	E-Commerce	22,357	32,477	32,470	32,282	28,715	28,057	29,897	36,352	39,371	45,541	31,229	26,957	+20.6%
Rivian (EDV)	E-Commerce	0	0	0	0	0	0	0	0	0	264	1,966	4,422 A (no FY2014 data)	
Freightliner/Fruehauf	Legacy	88,254	155,870	167,990	178,159	210,255	222,571	198,767	209,698	155,486	180,244	135,899	136,840	+55.1%
Hino	Legacy	17,077	24,913	23,979	28,478	38,140	41,858	39,696	35,664	30,050	32,429	23,262	27,905	+63.4%
International	Legacy	100,121	130,235	104,710	96,709	109,232	103,855	75,706	59,727	45,688	42,753	24,399	21,650	-78.4%
Isuzu	Legacy	22,857	33,211	32,071	34,393	41,686	52,983	52,217	45,061	39,067	45,835	34,528	41,387	+81.1%
Workhorse	Legacy	33,439	45,594	41,029	36,847	41,292	35,832	30,714	28,319	18,599	18,528	11,792	10,282	-69.3%
All Other Makes	Other	88,638	101,687	81,247	74,346	61,702	46,379	35,790	25,400	17,184	17,087	11,923	12,065	-86.4%
Chevrolet	Other	74,833	83,885	67,407	63,979	65,675	61,747	55,406	62,562	53,544	59,497	43,108	41,260	-44.9%
GMC	Other	73,557	74,449	53,793	45,592	37,140	30,622	21,014	18,660	15,140	15,608	10,357	8,688	-88.2%
Kenworth	Other	9,404	13,386	14,533	15,265	16,459	14,357	11,298	9,247	7,220	8,962	9,115	11,369	+20.9%
Nissan	Other	19,591	27,840	27,340	21,691	18,833	18,149	16,870	18,282	17,004	18,745	13,498	13,120	-33.0%

Testimony of Laura Padin

National Employment Law Project

In Support of Int. No. 0518-2026: Requiring the Licensing of Last- Mile Facilities

Hearing before the New York City Council

Committee on Consumer and Worker Protection

City Hall

New York, NY

April 9, 2026

Laura Padin

Senior Director of Contracted Worker Justice

National Employment Law Project

90 Broad Street, Suite 1100

New York, NY 10004

lpadin@nelp.org

Dear Chair Menin & Members of the Committee:

My name is Laura Padin, and I am the Senior Director of Contracted Worker Justice with the National Employment Law Project (NELP), a New York-based national nonprofit with more than fifty-five years of experience advocating for the labor and employment rights of low-wage workers. NELP works extensively at the federal, state and local levels, and has regularly advised the New York City Council on protecting workers in the city. Relevant for the legislation that the Committee is considering today, NELP has worked with warehouse and delivery workers across the country to improve their pay and working conditions and to hold logistics corporations accountable to their workers and the public.

I am testifying today in strong support of Int. No. 0518, which would require last-mile warehouse and storage facilities in the city to obtain a business license that would be conditioned on complying with certain safety, training, and employment requirements. The bill is a strong first step in raising workplace standards in an industry rife with exploitation and ensuring last-mile delivery operators are accountable to their workers and the public.

The Problems Created by the Rise of Last-Mile Delivery

As detailed in a report last year by the New York City Comptroller's Office, the rise of e-commerce has led to an exponential increase in freight and package deliveries.¹ Corporations like Amazon and FedEx have established last-mile delivery warehouses across the city to package orders and deliver them. In 2021, more than 2.3 million packages were delivered every day across the city, up from 1.1 million in 2017—a 109% increase in just four years.²

The logistics of delivering millions of packages has profoundly impacted New York City's communities. The high volume of deliveries has increased congestion and vehicle accidents; truck-related crashes more than doubled after last-mile facilities opened.³ Air quality has deteriorated as well, particularly in neighborhoods close to warehouses where residents are disproportionately low-income and people of color, including Sunset Park, Red Hook, and Hunts Point.⁴

The rise of last-mile facilities has also resulted in rapid growth in the last mile delivery workforce and a parallel transformation in these jobs due in substantial part to how Amazon, the industry leader and giant, has restructured the last mile delivery system. These facilities rely on thousands of warehouse and delivery workers to get packages from their facilities to customers' homes and businesses. This work includes receiving and sorting packages, moving packages onto delivery vehicles, maintaining warehouses and vehicles, and delivering packages to their final destinations.

Worker injuries are pervasive at last-mile facilities. According to the New York City Comptroller's Office, injury rates per 100 employees at last mile facilities are more than triple the national average for private employers.⁵ Severe injuries are also common, with 85% of injuries leading to time away from work or reassignment.⁶

Vehicle accidents near last-mile facilities are increasing as well. Of the 18 last-mile facilities over 50,000 square feet that opened in the city between 2017 and 2022, 14 of the facilities saw an increase in injury-causing crashes in their neighborhoods after the facilities opened.⁷

These high worker injury and vehicle accident rates are not inevitable but partly the result of choices made by Amazon to operate its delivery systems in ways that put workers' health and safety at risk. The most problematic aspects of this system are: (1) Amazon's outsourcing of supervision of the last-mile delivery workforce through a complex system of sub-contracting; and (2) the intense time pressures under which the corporation forces workers in the last mile delivery system to operate.

Amazon uses two systems to deliver the majority of its packages: "Amazon Flex, a platform-like system that relies on independent contractors, and Amazon DSP, a franchise-like system that uses subcontractors to deliver products following Amazon's clearly defined specifications (including its logo and branded vehicles)."⁸ Both of these systems rely entirely on contracted delivery drivers who are not directly employed by Amazon.

Amazon advertises its Delivery Service Partners (DSPs) program as a low-capital, start-up opportunity where entrepreneurs can start delivery companies to provide last-mile delivery services exclusively for Amazon.⁹ An analysis of OSHA injury data found that Amazon DSP delivery drivers were injured at the shockingly high rate of nearly one injury per five full-time equivalent workers in 2021 (18.3 per 100 workers).¹⁰ DSP delivery workers do not receive the same levels of safety training that established delivery providers like UPS provide.¹¹ DSPs also have elevated delivery driver turnover rates, with just under half of their workforce having less than one year tenure.¹² High turnover contributes to high injury rates, because new employees are much more likely to be injured on the job.¹³

Despite disclaiming responsibility as an employer for DSP delivery drivers, Amazon maintains near total control over every aspect of the delivery process. DSP drivers report to Amazon delivery stations to pick up packages for their route that has been set by Amazon employees.¹⁴ Amazon uses apps for surveillance and speed tracking, which increases the pressure and pace of deliveries.¹⁵ Amazon also increasingly requires the installation of AI cameras inside and outside of vans, which track everything from a driver's yawns to eye movements.¹⁶

The high injury rates among DSP delivery workers parallel conditions faced by Amazon warehouse workers, where extreme time demands implemented through automated algorithmic management systems are resulting in similarly elevated injury rates. Amazon's use of algorithmic management and automated decision-making systems, including technological surveillance, automated discipline and algorithmically-controlled quota systems, pressure workers to speed up the pace of their work and risk injury.¹⁷ A 2024 analysis of OSHA data found that the injury rate at Amazon warehouse facilities (6.5 injuries per 100 full-time equivalent workers) was more than 1.5 times that of TJK Companies' warehouses (whose subsidiaries include TJ Maxx, Marshalls, and HomeGoods) and almost triple that of Walmart's warehouses.¹⁸ Moreover, in 2024, the serious injury rate at Amazon warehouses was 5.9 per 100 workers—almost double the rate at non-Amazon warehouses (3.0

per 100).¹⁹ Federal and state OSHA inspectors have cited Amazon for putting speed before safety, “including poor ergonomic job design, the failure to use standard warehouse engineering methods, heavy package weights, and excessive worktime without breaks—all of which increase the risk of serious back, shoulder, and other disabling injuries.”²⁰

The Solution: Conditioning Last-Mile Business License on Compliance with Safety, Training, and Employment Standards

Int. No. 0518 represents a strong first step in ensuring that last-mile facilities are accountable to their workers and their local communities. It would do that by establishing standards for licensing, training, and supervision for the delivery workforce in order to reduce the elevated rates of worker injuries, vehicle accidents, and other adverse community impacts under the current unregulated system.

First, it would require last-mile delivery operators to contract with organizations certified to provide health and safety training to the workforce. These organizations would properly train last-mile warehouse workers and delivery drivers to keep them and the public safe. Training elements must include: how to drive a delivery vehicle safely; where and how to make delivery stops along trafficked roads so as to avoid creating safety hazards for pedestrians, cyclists, and workers; best ergonomic practices for workers who handle, sort, and move packages; and how to identify potential injuries, heat stress, or repetitive stress, as well as means to find assistance for physical therapy or other practices to mitigate injuries. Education and training are important tools for informing workers of possible hazards and preventing them.

Second, and equally importantly, it would require last-mile delivery operators to directly employ nearly all of the warehouse and delivery workers that are central to their businesses to ensure adequate supervision of and accountability for the last-mile delivery workforce. This means that last-mile delivery operators will no longer be able to use subcontracted delivery systems—such as hiring workers as independent contractors or through DSPs—which result in the current unstable, high turn-over, poorly supervised workforce. Direct employment would mean that that last-mile delivery operators imposing onerous, high-pressure delivery quotas would be responsible for ensuring the safety of their workers and surrounding communities. Requiring the companies imposing the quotas to be responsible for training and injury and accident reduction is an important step towards making the last-mile system stable, safe, and accountable.²¹

Third, for the limited number of contracted delivery workers that would be permitted to remain, the last-mile delivery operators would be required to maintain information about each of these drivers, including proof of commercial auto insurance and their driving record. Last-mile delivery operators must also post a \$500,000 bond for each non-employee delivery driver to be held by the commissioner in a fund. The fund would be used to compensate individuals injured in road incidents involving delivery drivers.

Fourth, it would require last-mile facility operators to provide all employees with 30 days advance notice of termination of employment, except for cases of egregious misconduct. The notice must include the reason for the termination and all records relied upon to substantiate the termination. These basic notice requirements can help workers to prepare for or contest terminations that might otherwise be financially devastating for them and their families. These requirements would also help make last mile warehouse and delivery jobs more stable, long term positions that would increase the reliability of the system.

Finally, the bill has strong anti-retaliation protections for workers exercising their rights under the law and strong penalties for last-mile facility operators that violate the law. These provisions will ensure that workers feel protected in enforcing their rights.

Conclusion

The fast-growing last-mile delivery system in its current form is endangering workers and communities. There is a pressing need for greater stability, training, and accountability in order to protect both the last mile delivery workforce and the public. NELP urges the City Council to pass Int. No. 0518-2026, which will provide critical regulation of this important new industry needs as it matures and grows.

¹ [Fast Shipping, Slow Justice: Traffic, Worker, and Climate Hazards in Last Mile Delivery](#), New York City Comptroller Brad Lander, Bureau of Policy and Research, Nov. 2025.

² *Id.* at 4.

³ *Id.* at 5.

⁴ *Id.*

⁵ *Id.*

⁶ *Id.* at 6.

⁷ *Id.* at 9.

⁸ Daniel Schneider, David Weil, Julie Su & Kevin Bruey, *Amazon Drives Low Wages: The Unraveling of Workplace Protections for Delivery Drivers*, Shift Project, Oct. 2025, <https://clje.law.harvard.edu/app/uploads/2025/10/Amazon-Drives-Low-Wages-The-Unraveling-of-Workplace-Protections-for-Delivery-Drivers.pdf#:~:text=60%25%20of%20both%20Amazon%20drivers%20and%20fulfillment,UPS%20and%20FedEx%20workers%20are%20exposed%20to..>

⁹ Primed for Pain: Amazon's Epidemic of Workplace Injuries, Strategic Organizing Center, May 2021, at 8, <https://thesoc.org/wp-content/uploads/sites/342/PrimedForPain.pdf>.

¹⁰ The Worst Mile: Production Pressure and the Injury Crisis in Amazon's Delivery System, Strategic Organizing Center, May 2022, at 6, <https://thesoc.org/wp-content/uploads/sites/342/The-Worst-Mile-1.pdf>.

¹¹ Fast Shipping report, *supra* note 1, at 22.

¹² "While just 2% of UPS drivers have been with the firm for less than a year, that share is 46% at Amazon." *Amazon Drives Low Wages*, *supra* note 8, at 11.

¹³ "Roughly 35% of work-related injuries and illnesses happened within the worker's first year on the job." Occupational Health and Safety Admin., *Work-Related Injury & Illness Summary*, 2023, at 5.

¹⁴ Primed for Pain, *supra* note 9, at 8-9.

¹⁵ *Amazon Drives Low Wages*, *supra* note 8, at 15-16.

¹⁶ The Worst Mile, *supra* note 10, at 3.

¹⁷ Irene Tung, Nicole Marquez & Paul Sonn, *Amazon's Outsized Role: The Injury Crisis in U.S. Warehouses and a Policy Roadmap to Protect Workers*, NATIONAL EMPLOYMENT LAW PROJECT,

May 1, 2024, at 10-11, <https://www.nelp.org/app/uploads/2024/05/Amazons-Outsized-Role-5-1-24.pdf>.

¹⁸ *Id.* at 6.

¹⁹ Failure to Deliver: Amazon Falls Short on Safety, Strategic Organizing Center, May 2025, at 1, <https://thesoc.org/wp-content/uploads/2025/05/May-2025-Strategic-Organizing-Center-Report-x-Failure-To-Deliver.pdf>.

²⁰ Amazon's Outsized Role, *supra* note 17, at 11.

²¹ See The Last Mile in New York City, Teamsters Local 804 – Delivery and Warehouse Employees, March 2026, at 33, <https://assets.nationbuilder.com/teamsters804/pages/2017/attachments/original/1775246154/The-Last-Mile-In-New-York-City-v2FINAL.pdf?1775246154>.

April 9, 2026

Intro 518

Members of the City Council, thank you for the opportunity to provide testimony. My name is William Hoyt, with New York City Industrial Advisors, writing to formally express strong opposition to Intro 518. While the legislation aims to address industrial oversight, it overlooks the fundamental structure of the "last-mile" industry and threatens to dismantle a delicate, living ecosystem that is vital to New York City's economic health and environmental progress.

Logistics in New York City is not merely a collection of large-scale operators; it is a symbiotic ecosystem. For every major carrier, there are hundreds of local small businesses—including third-party delivery firms, vehicle rental agencies, racking providers, and MEP (mechanical, electrical, and plumbing) contractors—that rely on these hubs. By imposing mandates that push large operators out of the five boroughs, Intro 518 inadvertently triggers a "domino effect," forcing these supporting small businesses to either relocate to neighboring states or cease operations entirely.

One of the most significant unintended consequences of Intro 518 is the certain increase in traffic congestion and emissions. If facilities move to New Jersey or Long Island, the "last mile" becomes the "last twenty miles." This necessitates larger trucks making longer trips into the city. Current last-mile hubs enable the use of electric vehicle (EV) fleets and cargo bicycles. Increasing the distance between the warehouse and the consumer will force a return to gas-powered heavy vehicles, directly undermining the City's climate and "Blue Highways" initiatives.

The redevelopment of industrial sites into modern last-mile facilities has proven to be a massive fiscal win for New York City. Data indicates that these modernized properties generate significantly higher property tax revenue—often tripling their previous contributions. Intro 518 would halt this investment, leaving the City with underutilized industrial zones and a substantial deficit in projected tax revenue needed for essential services.

The licensing and employment mandates introduced by this bill create a high-risk environment characterized by prohibitive fixed costs and regulatory uncertainty. Capital follows stability. If New York City becomes a hostile environment for logistics investment, developers and property owners will shift their focus to nearby markets, resulting in a loss of modernized infrastructure, brownfield remediation, and stormwater management improvements that typically accompany these developments.

Intro 518 overlooks the fundamental mechanics of modern supply chains. Rather than implementing restrictive licensing that encourages flight from the City, we must modernize our logistics network, not dismantle it. We urge the City Council to engage with industry stakeholders to develop a sustainable framework for New York City's logistics framework for the benefit of our environment, the future of New York City and all New Yorkers. Thank you for considering these points.

William Hoyt
Will@nycia.us



April 9, 2026

**Comments of Zach Miller
Vice President of Government Affairs
Trucking Association of New York**

before the

New York City Council Committee on Consumer and Worker Protection

Regarding Int 518-2026

Good morning, Chair Epstein and members of the Consumer and Worker Protection Committee. My name is Zach Miller, I am the Vice President of Government Affairs for the Trucking Association of New York. Since 1932, TANY has advocated on behalf of the trucking industry at all levels of government, providing compliance assistance, safety programs, and educational opportunities to our members, and in the process, creating jobs, supporting the economy, driving safety, and delivering a sustainable future.

TANY is proud to represent a diverse group of fleets throughout the State of New York. We have fleet members as small as single unit owner-operators all the way up to large national carriers. The bulk of our fleet membership are small and mid-sized fleets, still family owned and operated. That is why we strongly oppose the Delivery Protection Act (Int. 518). While we support policies that protect workers and promote fair labor practices, this legislation goes far beyond that goal. It would fundamentally restructure New York City's supply chain, with significant and unintended economic consequences. This is not simply a labor bill, safety bill, or licensing bill, it is a mandate that would disrupt how goods move throughout the city.

We are seeing real growth in key areas such as warehousing, logistics, and transportation. Approximately 15 percent of New York City's private sector jobs are in the industrial economy, and roughly 70 percent of those roles do not require a college degree, making them accessible, family-supporting careers that underpin our broader economy and supply chains. Within this landscape, last-mile delivery has emerged as the primary entry point into the trucking industry and small business ownership. While previous generations of trucking companies grew by servicing local factories, production facilities, or farms, those pathways have largely disappeared due to shifting economics and global supply chains. In their place, last-mile delivery, particularly in dense urban environments, has become the modern on-ramp to entrepreneurship in commercial transportation.

It provides real and accessible opportunities for minority- and immigrant-owned businesses, military veterans, justice-impacted individuals, and those who did not receive a college degree. These are not abstract concepts; they are pathways to economic mobility and independence.

Small, independent operators are also driving innovation in urban freight. They are deploying cargo bikes, electric quads, and hyper-local delivery models that help reduce congestion, emissions, and vehicle miles traveled while improving efficiency.

In a city like New York, last-mile delivery is about far more than small packages. Furniture, appliances, and specialty goods are routinely delivered directly to homes due in part to shifting consumer behavior and in part because retailers simply do not have the space to store inventory on-site. This system is essential to how the city functions.

The Delivery Protection Act poses an existential threat to this ecosystem. By effectively eliminating independent contractor models and imposing rigid employment structures, it risks forcing small operators out of the market, leading to consolidation, reduced competition, and diminished supply chain capacity.

We are particularly concerned about the following impacts:

- Disruptions to the supply chain that could lead to delays and reduced delivery capacity
- The loss of flexibility that allows small businesses to operate and grow
- Increased costs that will ultimately be passed on to consumers
- A disproportionate impact on small and minority-owned businesses
- Reduced efficiency, leading to more congestion and higher emissions, and the scaling back of innovative urban freight initiatives
- Overlapping and duplicative regulatory requirements that create uncertainty
- The ease in which operating licenses can be pulled
- Disinvestment in modernized facilities in NYC

At its core, this legislation would raise costs, reduce access to opportunity, and destabilize the very supply chain that New Yorkers rely on every day.

We do believe that, given the level of investment we are seeing and the projected growth in freight demand over the next 20 years, the City should take a closer look at segment-specific training and education requirements, as well as a thoughtful facility licensing framework. We commend the Council for raising these important considerations and look forward to working collaboratively with both the City Council and the Department of Consumer and Worker Protection to bring these ideas to life.

However, we urge the Council to carefully consider the broader consequences of Int-518. New York City is supposed to be a place where hard work and vision are rewarded. We cannot undermine the economic and logistical systems that keep New York running.

Thank you for your time and consideration.



April 9, 2026

NYC- EJA Testimony on the Delivery Protection Act (Int 0518)

Founded in 1991, the New York City Environmental Justice Alliance (NYC-EJA) is a non-profit, 501(c)3 citywide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their struggle for environmental justice. NYC-EJA empowers its member organizations in all five boroughs to advocate for improved environmental conditions and against inequitable environmental burdens by coordinating campaigns designed to inform City and State policies.

NYC-EJA submits our testimony in support of Intro 0518, or the Delivery Protection Act.

Int 0518-2026 would require operators of certain warehouses and storage facilities from which goods are delivered to final consumers in the City to obtain a business license from the Department of Consumer and Worker Protection. This bill would set forth the conditions of such a license, and would include safety, training, and employment requirements. This bill would also set forth enforcement options, including those available to the City and to workers.

We are part of the Last-Mile Coalition and the ElectrifyNY coalitions, which work to regulate the siting and operation of last-mile and mega e-commerce warehouses. NYC-EJA has long advocated for reducing vehicle miles traveled, tailpipe emissions, and air pollution. Many of our members' communities are located near industrial business zones, truck routes, and highways, and have been disproportionately burdened by air pollution, most recently by the siting and operation of these warehouses. Int 0518-2026 is a key piece of legislation that is long overdue and a key part of regulating last-mile warehouses across New York City.

The e-commerce sector has experienced exponential growth in the last decade, and New York City has experienced a rise in daily package deliveries from an estimated 1.1 million packages per day in 2017 to 2.5 million in 2024.¹ Last-mile e-commerce warehouses differ from traditional warehouses due to the high volume of product loading and unloading and product flow velocity, which results in way more truck trips coming in and out of last-mile e-commerce warehouses compared to traditional warehouses. This unregulated growth has created a public health crisis, particularly for low-income communities of color where these facilities are disproportionately clustered, and for workers on site and making the deliveries.

¹ New York City Office of the Comptroller. (2025) *Fast Shipping. Slow Justice: Traffic, Worker, and Climate Hazards in Last Mile Delivery*. <https://comptroller.nyc.gov/wp-content/uploads/documents/Last-Mile-Report-edit-2.pdf>



Int 0518 - 2026 is a critical step to address the inequities and ensure that low-income communities of color and workers are protected from this unchecked industry. From an environmental justice perspective, these labor protections protect public health. When workers are required to meet unrealistic daily delivery quotas and harmful working conditions, it results in reckless driving, unsafe parking, vehicle idling, and increased risks for pedestrians and cyclists. Safer working conditions mean safer streets, less pollution, and healthier neighborhoods.

The Delivery Protection Act directly addresses the failures of warehouse operators by requiring them to obtain a license through the Department of Consumer and Worker Protection. This bill will rein in this industry with tens of thousands of other regulated businesses in New York City and allow the City to plan accordingly for these warehouses. Furthermore, it ensures that repeat safety, labor, and environmental law violators answer for their offenses through license suspension or revocation.

We urge this Committee and Council to act swiftly to pass the Delivery Protection Act. With this bill, New York City has the opportunity to prioritize workers, its communities, and deliver environmental justice over unchecked corporate power.

NYC-EJA strongly supports Int 0518-2026 (Caban).



**Testimony of the Partnership for New York City
New York City Council
Committee on Consumer and Worker Protection
Int. 513-2026, licensing of last-mile facilities
April 9, 2026**

Thank you, Chair Epstein and members of the committee, for the opportunity to testify on Int. 513 which would require the licensing of last-mile facilities. The Partnership for New York City mobilizes private sector resources and expertise to advance New York City's standing as a global center of economic opportunity, upward mobility, and innovation. We are a nonprofit organization whose members are preeminent business leaders and companies that support nearly one million jobs in New York City and deliver approximately \$263 billion in economic output.

The Partnership opposes Int. 513. While we share the Council's commitment to safe workplaces, economic opportunity, and environmental sustainability, Int. 513 would have far-reaching and unintended consequences that would push last-mile facilities out of the city, undermine our delivery infrastructure, harm small businesses and workers, and increase costs for consumers throughout New York City.

Last-mile facilities are essential to daily life and the city's economy. On an average day in 2024, one-third of adult New Yorkers received a package, with 2.5 million packages delivered citywide. Nearly 78% of New Yorkers shop online in a week, relying on fast, affordable delivery for groceries, medicine, and other necessities. These facilities help keep goods accessible and affordable for households across all income levels.

Int. 513's strict licensing requirements, prohibitions on contracted delivery work, and mandates for direct employment would upend established business models. It would create extraordinary operational uncertainty for last-mile businesses. The city's ability to close a last-mile facility on short notice would expose businesses to the risk of shutdown for an unknown amount of time. This creates an unacceptable level of risk and would push many businesses to relocate outside the city.

This bill would have substantial compliance costs, including reduced operational flexibility and significant administrative burdens. These costs would ultimately be passed on to consumers, increasing the price of everyday goods at a time when New Yorkers are already facing rising expenses.

Int. 513 would also harm small and minority-owned businesses and their employees. The last mile-delivery companies who service last-mile facilities are largely local, minority-owned, and family-owned small businesses. This bill would put them out of business, reducing the number of opportunities for the 59% of New York City adults without college degrees for whom these jobs represent access to stable employment, competitive wages, and scheduling flexibility.

Finally, Int. 513 conflicts with the city's environmental and sustainability objectives. Increasing regulatory and operational costs for last-mile facilities will encourage them to relocate outside the

city. This would force delivery vehicles to travel further distances, increasing traffic congestion and greenhouse gas emissions.

Last-mile delivery facilities are essential to New York City's economic vitality and environmental objectives. Int. 513 would destabilize this system. We hope you will reject this legislation.

Thank you.



365 West Passaic Street, Suite 490 • Rochelle Park, NJ 07662
Tel: (201) 368-2100 • Email: info@cianj.org • Web: www.cianj.org

April 9, 2026

New York City Council
Committee on Consumer and Worker Protection
City Hall, 2nd Floor
New York, NY 10007

Re: CIANJ Testimony in Opposition to Int. No. 518-2026

Dear Members of the Committee:

Thank you for the opportunity to submit written testimony on Int. No. 518-2026, or the Delivery Protection Act, which would create a new licensing regime for “last-mile facilities” and impose additional safety, training, and employment-related requirements as conditions of operating in New York City going forward.

The Commerce and Industry Association of New Jersey (CIANJ) is a statewide business advocacy organization and a long-standing advocate for free enterprise in New Jersey. Our mission is to foster an economic climate in the Garden State that enhances business potential and makes New Jersey a better state in which to live, work, and conduct business. We do this through education, legislative vigilance, and membership interaction.

We appreciate the City Council’s interest in improving safety and accountability in the delivery and logistics ecosystem. But Int. No. 518-2026 is the wrong approach. As written, it is bad for business and bad for workers because it relies on sweeping, heavy-handed mandates and expensive compliance obligations that will make it significantly harder to operate and invest in New York City. At the same time, while we oppose this legislation on its merits, the CIANJ would be eager to welcome businesses thinking of relocating some or all of their operations to New Jersey should this bill pass.

Int. No. 518-2026 would create a costly and uncertain operating environment

At a high level, this bill would require certain operators of warehouses and storage facilities from which goods are delivered to final consumers in NYC to obtain a business license from the Department of Consumer and Worker Protection (DCWP) and to comply with license conditions that include “safety, training and employment requirements,” backed by enforcement tools available to the City and to workers.

CIANJ’s concern is not with the concept of safety but with a regulatory structure that creates uncertainty, adds compliance layers, and increases costs – across a sector that supports jobs, supports small businesses, and supports everyday commerce.

For example, the bill imposes a site-by-site licensing approach, including an annual fee and a two-year term, and it creates a framework where licensure can be impacted by a broad set of prior “violations” across many areas of law. That kind of conditional licensing system – paired with extensive rulemaking authority – can chill investment and make long-term planning more difficult, especially for small and mid-sized operators that do not have large compliance departments.

The bill’s labor mandates are overly prescriptive and likely to reduce job opportunities

CIANJ is particularly concerned that Int. No. 518-2026 attempts to regulate complex logistics operations through blanket labor-model mandates rather than targeted safety solutions. As drafted, the bill requires that workers performing “core warehouse services” at covered facilities be “directly employed”. It also requires “direct employment” for certain delivery workers. Finally, the bill prohibits contracting with third parties (including staffing agencies and subcontractors) for core delivery and warehouse services.

This type of “one-size-fits-all” mandate ignores how the logistics and delivery workforce functions in the real world. Operations may legitimately rely on a mix of seasonal labor, specialized contractors, and third-party support to meet fluctuating demand, maintain service levels, and create entry points for workers. The bill essentially eliminates a number of lawful – and common – operating models, which is usually a recipe for the following unintended (though predictable) results:

- **Consolidation** (fewer operators can absorb the overhead);
- **Reduced flexibility** (which hurts service and increases costs); and
- **Fewer jobs**, not more – because businesses respond by downsizing, automating faster, or leaving the market.

This all adds up to a bill that is framed as protecting workers, but that in reality may still end up reducing worker opportunity by making operations too expensive or too complex to sustain.

The bill piles on expensive compliance requirements that will be unworkable at scale

In addition to licensing and labor-model mandates, the Delivery Protection Act imposes a range of operational compliance requirements that will be significant cost drivers. For example, during any period where contracted workers are used, the bill requires extensive recordkeeping about delivery workers (including driving record and route records), and it includes a requirement that facility operators post a \$500,000 bond for each delivery worker retained as a non-employee. That's a significant outlay for a single worker, and it is a requirement triggered by even one delivery completed by a "non-employee".

The bill also establishes training requirements that rely on a department-certified nonprofit training organization and mandates a training program of at least six hours covering a wide range of topics. Finally, the bill imposes employment process requirements, such as a 30-day notice of termination absent "egregious misconduct".

These requirements may sound straightforward in the abstract. In practice, they create a compliance regime that is expensive to administer and difficult to align with the operational realities of modern delivery and logistics networks, especially for smaller operators. A plausible outcome is that some businesses will decide the regulatory risk and cost are not worth it.

Int. No. 518-2026 could push jobs and investment out of New York City, and New Jersey will be ready to welcome them

CIANJ has consistently maintained that investment goes where it is welcomed and where public policy is stable, predictable, and economically rational. If New York City chooses to adopt a regulatory framework that materially increases cost, reduces flexibility, and expands liability for last-mile operations, businesses will respond. One possible response - particularly in a dense metro region with immediate border alternatives - would be to situate facilities outside the City while still serving the City's consumer market.

From a regional economic perspective, that means New York City risks exporting jobs, commercial activity, private investment, and parts of its tax base to nearby jurisdictions that offer a more workable operating environment. And to be candid: New Jersey will gladly compete for and welcome that economic development. We say this not as a threat, but as a matter of economic reality. New Jersey has long been a center of commerce and logistics supporting the broader metro economy, and our state and local partners routinely work to attract responsible investment that creates private-sector jobs and strengthens communities.

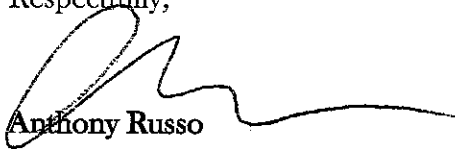
We would much prefer to see New York City pursue balanced, targeted solutions that improve safety without driving disinvestment. But if the Council makes it materially harder to operate, companies will look to the nearest viable alternatives. New Jersey is directly next door and positioned to absorb growth.

Conclusion

CIANJ respectfully urges the New York City Council to oppose Int. No. 518-2026 as drafted. This bill is likely to be bad for business and bad for workers not because safety and accountability are unimportant, but because the bill's mechanisms are heavy-handed: broad licensing conditions, sweeping restrictions on contracting and labor models, and layered compliance obligations that increase costs and uncertainty.

If New York City proceeds with this approach, the Council should not be surprised if jobs and facilities migrate outside city limits. And if that happens, New Jersey will be ready to welcome the employers, the investment, and the job creation.

Respectfully,

A handwritten signature in black ink, appearing to read 'Anthony Russo', with a long horizontal flourish extending to the right.

Anthony Russo

President

CIANJ

arusso@cianj.org

REBNY Testimony | April 9, 2026

The Real Estate Board of New York to The New York City Council Committee on Consumer and Worker Protection on Intro 518

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY appreciates the opportunity to express our opposition to [Intro 518 \(Cabán\)](#).

Last-mile delivery is integral to the daily lives of New Yorkers and a foundation of New York City's economy. On any given day, [one-third of New Yorkers receive a package, and 2.5 million packages are delivered across all five boroughs](#). New Yorkers rely on fast, affordable delivery to access groceries, medicine, household essentials, and goods from local and national businesses.

As e-commerce demand continues to rise, last-mile facilities have become critical infrastructure for New Yorkers. A modern, well-functioning last-mile delivery network is essential to keeping costs down, ensuring timely access to goods, creating and sustaining local jobs, and reducing congestion and emissions across all five boroughs.

Intro 518 would impose new licensing and employment requirements on last-mile facilities. The bill would require operators to obtain discretionary 2-year licenses contingent on past violations and mandate that all facility workers be directly employed by the operating company. In practice, this would prohibit the use of subcontractors, staffing agencies, and third-party delivery companies to support these core facility roles. In addition, Intro 518 defines last-mile facilities based on their function, thereby extending its applicability beyond large parcel delivery stations to include smaller courier depots, micro-fulfillment centers, and shared logistics hubs, depending on how operations are interpreted.

REBNY strongly opposes Intro 518, which overlooks the fundamental structure of the last-mile industry and would have adverse effects on the City's economy, environment, and affordability. Last-mile delivery relies heavily on subcontracted labor to sustain the efficient movement of goods. Among other reasons, this is the case to account for fluctuations in demand, including seasonal peaks and daily volume changes.

Subcontracted delivery companies, commonly known as Delivery Service Partners (DSPs) or Independent Service Partners (ISPs), are often locally based, minority- and family-owned small businesses that create stable jobs, invest in their neighborhoods, and provide critical pathways to employment and entrepreneurship. Most last-mile delivery jobs are entry- to mid-skill positions typically requiring no more than a high school degree. [According to an AKRF analysis](#), roughly 46 percent of the workforce has completed high school as their highest level of educational attainment. A further 32

percent report completing some college, with only 13 percent of the workforce having completed a bachelor's degree. Further, if a shift to direct employment is mandated under Intro 518, AKRF estimates that over 10,000 jobs could be lost to the City.

Faced with rising costs and operational constraints, facilities will choose to relocate outside New York City to places like New Jersey or Long Island. Fewer last-mile facilities in the city would not reduce delivery demand. Instead, it would lead to longer delivery routes, the use of larger trucks, and increased congestion on key corridors, including the BQE, crossings, and local streets. [According to AKRF](#), relocating a single existing last-mile facility from western Brooklyn to New Jersey would nearly double the facility's daily CO2 emissions, and more than double the PM2.5 and NOx emissions generated by the delivery vans serving it. Moreover, siting last-mile facilities close to the end consumer supports the use of electric vehicles, cargo bikes, and micro-distribution hubs by enabling shorter routes and more efficient, dense deliveries. Pushing these facilities outside the city would likely force operators to revert to gas-powered fleets and stagnate the use of local micro-hubs and cargo bikes, undermining progress toward climate goals.

Furthermore, disrupting the subcontracted delivery model would significantly increase the cost of operating facilities and delivering goods, with direct consequences for consumers. By requiring higher-cost employment models and prompting less efficient operations through facility consolidations and relocations, Intro 518 would raise the per-package cost of last-mile delivery. [AKRF estimates](#) that if the additional costs required to maintain current delivery service levels were fully passed on to households, the average household would incur approximately \$664 in added annual costs. Alternatively, if costs were constrained and service quality declined, the City could experience roughly 109 million delayed package deliveries per year.

Finally, facility relocation would result in a loss of critical tax revenue. According to a [study executed by HR&A and AKRF](#), the properties developed as last-mile facilities over the past decade generate \$8.4 million more in annual property tax revenue for the City than they would if they had not been redeveloped, roughly tripling their tax contributions. Losing these facilities would undermine a growing source of revenue that supports essential City services.

New York City's last-mile delivery network is a critical engine of its economy and daily life. Intro 518 would destabilize this system, eliminating small businesses, reducing worker flexibility, and driving operations out of the City. The result would be higher costs, more congestion, and fewer opportunities for New Yorkers. We urge the City Council to work with stakeholders on alternative solutions that support a resilient, growing, and efficient logistics ecosystem.

CONTACT:

Kate Goldmann

Senior Housing and Planning Analyst

Real Estate Board of New York

kgoldmann@rebny.com



April 9, 2026

New York City Council
Committee on Consumer and Worker Protection
City Hall, 2nd Floor
New York, NY 10007

Re: Testimony of The Business Council of New York State in Opposition to Int. No. 518-2026 (Delivery Protection Act)

Dear Chair and Members of the Committee:

Thank you for the opportunity to submit testimony on Int. 518, the “Delivery Protection Act.”

The Business Council of New York State represents employers of all sizes and across every major industry in New York. Our members operate in New York City and throughout the state, employing hundreds of thousands of New Yorkers. Our mission is to promote economic growth, job creation, and a competitive business climate that allows New York to retain and attract private-sector investment.

We appreciate the Council’s focus on safety and accountability within the delivery and logistics sector. However, Int. 518 raises significant concerns from a competitiveness and economic growth perspective. As drafted, the legislation imposes broad structural mandates and extensive compliance obligations that could materially increase operating costs and reduce flexibility in a sector that plays a critical role in supporting small businesses, retail commerce, and consumer access.

A Broad Licensing Regime with Significant Economic Implications

Int. 518 would require certain operators of last-mile facilities to obtain a license from the Department of Consumer and Worker Protection (DCWP) and comply with detailed safety, training, and employment-related requirements as a condition of continued operation. From a policy standpoint, the Business Council is concerned about the cumulative impact of this approach. The bill establishes:

- Facility-by-facility licensure;
- Annual fees and two-year renewal cycles;
- Disclosure and compliance conditions tied to licensure;
- Significant enforcement authority; and
- Broad rulemaking discretion for DCWP.

New York businesses already operate within an extensive regulatory framework at the local, state, and federal levels. When new licensing regimes are layered onto existing requirements – particularly where continued operations are conditioned on broad compliance criteria – it increases uncertainty and complicates long-term investment decisions. Employers evaluating capital investment, workforce expansion, and facility siting require predictability. Policies that introduce additional regulatory risk, particularly in sectors characterized by tight margins and rapid operational evolution, can have a chilling effect on future growth.

Prescriptive Labor Model Mandates Risk Unintended Consequences

The legislation also attempts to address safety concerns by mandating specific labor structures. The bill requires direct employment of workers performing “core warehouse services,” mandates direct employment for certain delivery workers, and prohibits the use of third-party contractors for core warehouse and delivery services. The Business Council is concerned that these provisions substitute rigid structural requirements for targeted safety solutions.

The logistics and delivery ecosystem is dynamic. Employers often rely on a combination of direct employees, seasonal labor, and specialized third-party services to respond to fluctuations in consumer demand, supply chain conditions, and operational needs. Removing legitimate and widely-used operating models may produce outcomes that are counterproductive. When flexibility is constrained, employers may respond by laying off workers, reducing service offerings, limiting expansion in higher-cost jurisdictions, or relocating to friendlier business environments.

The Business Council is concerned that while the legislation is framed as enhancing worker protections, policy choices that significantly raise operating costs can ultimately limit hiring, reduce entry-level opportunities, and slow job growth in the sector.

Significant Compliance Obligations Increase Cost Pressures

Beyond labor mandates, the Delivery Protection Act establishes additional compliance requirements that would add operational complexity. These include detailed recordkeeping obligations, bonding requirements tied to the use of non-employee delivery workers (those delivering from last-mile facilities less than 8 hours in a month), mandatory training through DCWP-certified organizations, and employment process requirements such as advance notice of termination absent specified misconduct.

Each of these elements carries cost implications. Taken together, they represent a substantial expansion of regulatory oversight in an industry already subject to workplace safety laws, wage and hour regulations, and transportation-related requirements.

Policymakers should carefully evaluate whether this cumulative regulatory burden aligns with broader economic development goals.

Competitiveness and Economic Strategy Matter

New York’s economic strength depends on maintaining a business environment that supports investment, innovation, and job creation. The logistics and delivery sector is a foundational component of modern commerce – enabling small businesses to reach customers, supporting retail activity, and facilitating consumer access to goods. Regulatory policy should address specific problems with precision. Broad mandates that materially increase cost structures without clear evidence of proportional benefit risk weakening New York City’s and New York State’s competitive position.

In a region where businesses have geographic alternatives, regulatory intensity can influence where facilities are located, where capital is deployed, and where jobs are created. While we believe New York can and should remain a leader in commerce and logistics, that outcome depends on maintaining a regulatory framework that is balanced, targeted, and economically sustainable.

The Delivery Protection Act is not the right solution for NYC

The Business Council respectfully urges the Council to reconsider Int. 518 in its current form. We encourage a more targeted approach that addresses specific safety concerns while preserving operational flexibility, supporting workforce opportunity, and maintaining New York’s competitiveness as

a place to invest and grow. Thoughtful regulatory policy should strengthen, not inadvertently constrain, the sectors that underpin our state's economic vitality.

Thank you for the opportunity to provide our perspective.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Zuber". The signature is fluid and cursive, with the first name "Paul" being more prominent than the last name "Zuber".

Paul Zuber
Executive Vice President
The Business Council of NYS
paul.zuber@bcnys.org



**UNITED
NEIGHBORHOOD
HOUSES**

45 Broadway, 22nd Floor, New York, NY 10006
212-967-0322 | www.unhny.org

**Testimony of United Neighborhood Houses
Before the New York City Council Committee on General Welfare
Council Member Crystal Hudson, Chair**

Oversight: Food Insecurity

**Submitted by Tara Klein, Deputy Director of Policy & Advocacy
April 13, 2026**

Thank you, Chair Hudson and members of the New York City Council Committee on General Welfare for convening today's oversight hearing on food insecurity.

United Neighborhood Houses of New York (UNH) is a policy and social change organization with a mission to promote and strengthen settlement houses' neighborhood-based, multi-service approach to improving the lives of low- and moderate-income New Yorkers. Settlement houses provide multi-generational services designed to support individuals, families, and communities. Settlement house programs build bonds within and between communities and create opportunities for advocacy and social change. UNH was founded in 1919 by settlement house leaders who recognized the strength in their collective voices to drive important social reforms. With this goal, UNH was tasked to coordinate the efforts of settlement houses; document their shared learning and experiences; and increase the influence and impact of settlement houses for the greater good of New York communities. UNH has successfully advocated for fair and affordable housing, child labor laws, inclusive policies and services for immigrants, adult literacy education, public recreation space, quality child-care and after-school programs, job training, programs serving older adults, access to the arts and to healthy food, and more.

Settlement houses address hunger through benefits enrollment, pantry services, community outreach, and referrals. Across the settlement house network, nearly 70,000 individuals received support with public benefits enrollment last year, including through NYC Benefits, the Hunger Prevention and Nutrition Assistance Program, and the Nutrition Outreach and Education Program. Still, resources and government support remain sparse.

Food insecurity remains a top community need for New Yorkers. With rising housing costs and federal changes to SNAP, settlement houses continue to see an escalation in demand for food assistance across the five boroughs. In 2023, 14.5% of New Yorkers reported food insecurity—meaning they sometimes or often didn't have enough to eat—compared to 10.7% in

2019.¹ Roughly 1 in 5 New York children (19%) were food insecure in 2023.² Food insecurity falls disproportionately along racial lines: 26% of Hispanic New Yorkers, 25% of Black New Yorkers, and 9% of white New Yorkers reported food insecurity. Noncitizens are nearly twice as likely to be food-insecure as U.S.-born and naturalized citizens.³

Recent federal policy changes, such as expanded Able-Bodied Adults Without Dependents (ABAWD) work requirements and new restrictions on immigrant eligibility under H.R.1, will push more New Yorkers to utilize emergency food assistance at community-based organizations, which will further strain the long pantry lines that are already the norm at settlement houses.

This testimony will highlight the new SNAP work requirements and how community service can meet those requirements, ways to address the scourge of SNAP skimming, and enhancing food security for immigrant New Yorkers. We also emphasize the importance of funding programs that we raised in our Preliminary Budget testimony last month, such as the Community Food Connection (CFC) program and NYC Benefits.

New SNAP Work Requirements and Community Service

The federal administration has implemented new barriers to accessing SNAP that requires Able Bodied Adults Without Dependents (ABAWD) recipients to meet specific work requirements, which is expected to impact hundreds of thousands of New Yorkers; similar rule changes will be coming soon for Medicaid recipients. These work requirements can also be met through community service or volunteer hours. Settlement houses are eager to assist New Yorkers who are unable to access SNAP benefits that they could previously access, and many have volunteer opportunities available, thus offering a win-win solution that also benefits the community. In fact, last year 13,535 people volunteered with UNH member settlement houses. Still, it takes staff time and money to manage volunteers, and the City should provide financial support and technical assistance to organizations who are providing these volunteer opportunities.

Some of this work is already happening, and we encourage the City to expand on these efforts:

HRA Community Service Partnership

The NYC Human Resources Administration (HRA) has created an opportunity for CBOs to partner with the agency to offer community service and volunteer engagement opportunities to support cash assistance and SNAP recipients' compliance with work requirements, including ABAWDs. CBOs can fill out a form on HRA's website, choosing between two pathways: the Community Service Provider (CSP) track for high-touch organizations that can support structured, compliance-driven service activities, or the Self-Enrolled Voluntary Service Provider (SEVSP) track for light-touch programs offering voluntary, small-scale opportunities.

Several of UNH's members filled out this interest form and have been working with HRA to begin the partnership. Most are taking part in the SEVSP track for small-scale opportunities. Under this program, they complete a memorandum of understanding with a larger work referral

¹ [Food Insecurity among the Overall Population in New York](#) - Feeding America

² [Food Insecurity among the Child Population in New York](#) - Feeding America

³ [Food Insecurity Disparities Among Immigrants in the U.S.](#) - American Journal of Preventive Medicine

organization. The larger organization refers clients to volunteer opportunities in their local community including the CBO. The CBOs work on a clearance process and paperwork for the volunteer, receiving some technical assistance and support from the larger organization.

While the program is still under development, our settlement house members participating in the program suggest it is working well so far, and that there is good communication with the larger organization. Still, they are not receiving any financial support to help manage the volunteers, which is essential to ensure volunteers are properly placed, trained, managed, and supported. At one settlement house, there is just one volunteer coordinator who manages volunteers at multiple sites across an agency that serves 50,000 individuals each year. Another settlement house reports having three volunteer coordinators on staff, and that they would feel comfortable taking on up to ten new volunteers before needing to hire another coordinator.

As HRA rolls out this program, we urge the City to invest in the programs signing up to do this work so it can meaningfully carry out the City's goals, and we can begin to create systems to address federal work requirements that show no signs of ending in the near future.

Civic Impact Funding

The Civic Impact Fund (CIF), under NYC Service, provides up to \$10,000 for nonprofit and community-based organizations in TRIE-designated high-need neighborhoods to expand volunteer-driven services addressing food access, safety, and mental health. Organizations use this funding for staff time, supplies, volunteer stipends, and training needs. In 2024, [CIF recipients](#) engaged 2,792 volunteers, served 122,584 residents, and distributed 444,385 pounds of food. While these grants are often short-term and meant to support specific time-bound issues, it represents an important tool for the City to support and encourage community service. In addition, NYC Service offers wide-scale trainings and technical assistance for CBOs across the City who want to support and scale-up their volunteer work.

Investing in the CIF program and NYC Service presents an opportunity for SNAP recipients who are ABAWD to continue receiving SNAP benefits by meeting their work requirements through volunteering at organizations across the City. **In the FY27 Budget, the City should invest \$13 million in NYC Service and its Civic Impact Fund, which funds nonprofits to expand their volunteer infrastructure, which in turn will help those newly subject to federal SNAP work or volunteer requirements.** This investment would expand the CIF program to include more community-based organizations and larger grant sizes, allowing CBOs and settlement houses to expand or fund their volunteer programs. For example, between 50 to 100 CBOs could receive grants, worth about \$50,000 for small or mid-sized organizations, up to \$250,000 for larger CBOs, and about \$500,000 of the \$13 million fund could be reserved for administrative support for NYC Service.

SNAP Skimming

Over the last several years, SNAP skimming has emerged as a top challenge facing low-income New Yorkers. UNH's settlement house members have increasingly raised concerns that this is persistently occurring in communities, especially for older adults and those who rely on EBT card benefits to feed their families, and there is little recourse to address the problem. UNH strongly supports Governor Hochul's Executive Budget proposal to transition to EBT chip card

technology to address SNAP skimming, and further supports a \$20 million State investment to create a SNAP skimming victims compensation fund to support New Yorkers who have had their benefits stolen. While most actions to address skimming must come from the federal or State government, there are some limited actions the City can take to help address the problem.

Skimming is the practice of individuals using devices and attaching them to point-of-sale (POS) machines or PIN pads to steal card numbers and other information from credit, debit, and EBT cards. The process of skimming retrieves data from the magnetic strip on an individual's card, which is then used to record the cardholder's PIN.

This has had a devastating impact on families such as skipping meals until the next grocery pay period, and leaving them without funds to buy essential groceries and other necessities. Skimming exacerbates food insecurity and financial stress for already vulnerable households, making it harder for them to meet their basic needs and maintain stability.

The scope of the problem in New York is stunningly large: The [USDA reports](#) that New Yorkers have received almost \$51 million in replacement SNAP benefits between 2023 and the end of 2024. The cost of this problem is likely even higher, since many families do not report the crimes. In a recent [Propel survey](#) of New York State SNAP recipients, over 2,500 of the almost 12,000 survey respondents reported having their SNAP benefits stolen within the past year. Nearly 40 percent of theft victims did not file for reimbursement, with the majority reporting that they weren't aware refunds were an option. The cost of this problem is likely higher, since many families do not report the crimes. With fewer recipients reporting skimming thefts due to the federal government no longer providing compensation funds, it is nearly impossible to have an accurate grasp on the amount of funds being skimmed.

UNH has been urging Governor Hochul to transition EBT cards with more secure chip card technology and we are grateful for the inclusion of chip cards in her Executive Budget Proposal. According to Visa, EMV chip cards decreased fraud by 87 percent from 2015-2019 because they have higher amounts of encryption technology on the chip. Several states have taken action to replace the cards on their own, including California, Maryland, Massachusetts, and Oklahoma. California saw an [83% decline](#) in skimming fraud when it implemented the chip cards in 2024-2025. We are grateful that New York will be the next state to make this simple and impactful change and we hope the Council will support this policy.

Resolution 21

We urge the City Council to support Council Member Alexa Avilés Resolution 21, which calls on the New York State Legislature to pass and for Governor Hochul to sign A03578/S403 to establish a SNAP and cash assistance fraud victims compensation fund. This aligns with UNH's advocacy at the State level of establishing a SNAP compensation fund. The State Senate included a \$3 million compensation fund in its one house budget resolution last month, and as the budget process runs late we hope that Council will support our efforts to get this funding across the finish line.

Statewide “SNAP4All” program

At the State level, UNH is advocating to create a [“SNAP4All” program](#), which would utilize state funds to provide food benefits to low-income New Yorkers who are currently ineligible for SNAP due solely to their immigration status. Federal law limits SNAP participation to U.S. citizens and certain lawfully present non-citizens, while roughly 673,000 New Yorkers are excluded from SNAP for no other reason than their immigration status. Last year’s federal spending bill went even further and struck existing SNAP eligibility for refugees, asylees, and victims of trafficking, representing 41,000 New Yorkers. Every New Yorker deserves the basic human right to food, regardless of their citizenship status. Investing in SNAP4All ensures every New Yorker has the food they urgently need.

The NYS Child Poverty Reduction Advisory Council recently [recommended](#) the creation of a state food benefit for households with children that are ineligible for SNAP based on citizenship status. Several states have recently enacted similar programs, including California, Illinois, Maine, Minnesota, and Washington. SNAP4All is detailed in legislation S.9033/A.6632 (Senator Rivera and Assemblymember González-Rojas).

We are grateful that the previous Council expressed support for this concept through the adoption of Resolution 57 of 2024, which calls on the state to advance this policy for older adults. **We urge the Council to support our ongoing efforts to create a SNAP4All program at the State level, and to explore new ways the City can step in and support these populations.**

Thank you for your time. If you have any questions, please feel free to contact me at tklein@unhny.org.

TESTIMONY OPPOSING INTRO 518

My name is Julissa Alvarez, and I am the owner of a last-mile Delivery Service Partner (DSP) company operating in New York City. I have been in business since 2020, and over the years I have proudly employed hundreds of individuals from my community, people who look like me, who share similar life experiences, and who are often overlooked by traditional employers.

Today, my company employs 185 people, with approximately 80% working full-time. From day one, we have built our business around the human component of last-mile delivery. We know our employees by name. We understand their family situations, their challenges, and their goals. There is trust between our team and our leadership, and that trust is something we have intentionally cultivated.

We actively seek feedback from our employees through surveys and open communication channels, allowing us to continuously improve working conditions and ensure their voices are heard. Many of our team members have already spoken about the benefits and support we provide.

When I first learned about Intro 518, I was honestly puzzled. I could not clearly understand what problem this bill is trying to solve, especially for companies like mine that are already deeply committed to their workforce.

The reality is that many of the individuals we employ would not have access to opportunities with large corporations. These include older workers who may struggle with technology, immigrants entering the workforce for the first time, and students who rely on flexible scheduling to support their education. We provide opportunities where others often do not.

Safety is our top priority. Since our company's founding, we have had only one reported claim, which reflects our strong safety culture and commitment to protecting both our employees and the communities we serve.

Our company also serves as an advocate for our workers. When something is not working, our employees come directly to us. We have systems in place to address concerns quickly and effectively, and when necessary, we escalate issues to ensure they are resolved. We are constantly evolving, and we have invested in robust technology that helps us maintain safety, accountability, and efficiency.

Intro 518 risks disrupting a model that is working, not just for business owners like myself, but for the hundreds of workers who depend on us for opportunity, stability, and support.

I respectfully urge you to reconsider this bill and to engage directly with small business owners and DSP operators who are on the ground doing this work every day. We are not the problem—we are part of the solution. Thank you for your time and consideration.

Julissa Alvarez, 646-667-1021, Julissa.alvarezdiaz@gmail.com

Dear council members, my name is Andre wright and I'm a small business owner operating a FedEx contract in New York City.

I am writing to express my concern and opposition to intro-518 and the big impact it will have on all last mile delivery businesses as myself.

My company operates as a subcontracted delivery provider, and we rely on the current structure to efficiently serve customers while maintaining jobs for drivers and staff. As currently written, this legislation appears likely to increase operating costs, compliance requirements, and liability in ways that could make it extremely difficult for small contractors like mine to continue operating. My specific concerns include:

- Increased licensing and compliance costs that may be difficult for small operators to absorb
- Potential restrictions or changes to subcontracting structures that our business depends on
- Risk of reduced flexibility in staffing and routing that could impact service reliability
- The possibility that small businesses like mine could be forced to downsize or shut down

I fully support improving worker safety and fair working conditions. However, I am concerned that the current approach may unintentionally harm small, locally operating businesses that are not large corporations, but instead part of the local logistics ecosystem.

I respectfully ask that you consider amendments that would:

- Protect small subcontractor delivery businesses
- Avoid unintended job losses in local communities
- Ensure compliance requirements are scalable based on business size
- Preserve the subcontracting model that allows companies like mine to operate.

Thank you for hearing my concerns

Sincerely

Andre wright

Aj delivery service



Dear Members of the New York City Council,

I am here as a small business owner that operates in New York City to express serious concern regarding the proposed Delivery Protection Act and its potential impact on companies like mine, our employees, and the communities we serve.

Let me be clear: we support smart, fair regulation. Government has an important role to play in establishing guidelines that ensure safety, accountability, and equitable treatment of workers. In fact, those principles are core to how we operate every day. We prioritize safety above all else, provide strong wages and benefits, and actively create opportunities for growth and advancement for our team members—all of whom are New Yorkers building careers and supporting their families.

However, this legislation goes far beyond setting reasonable standards. It risks dictating how businesses must operate, rather than allowing responsible operators the flexibility to meet those standards in ways that work effectively. By potentially restricting widely used operating models and imposing significant structural requirements, the proposed law would place an outsized burden on small and mid-sized businesses that lack the resources of large corporations.

Ironically, policies like this may achieve the opposite of their intended goal. Instead of protecting workers, they risk:

- Forcing small businesses out of the market
- Reducing competition and opportunity
- Driving jobs out of New York City
- Increasing costs for consumers across the five boroughs

Large companies may be able to absorb these changes. Small businesses cannot. The result could be a less diverse, less competitive marketplace—one where independent operators are replaced rather than strengthened.

New York City thrives because of its small businesses. In the delivery and logistics sector alone, hundreds—if not thousands—of local companies provide stable employment, strong benefits, and real career pathways to New Yorkers. These businesses are not the problem—they are part of the solution.

We urge the Council to reconsider the current approach. Focus on setting clear, enforceable standards for safety, wages, and accountability—but allow businesses the flexibility to meet those standards without imposing rigid operational mandates that may unintentionally dismantle the very ecosystem that supports so many workers.

We stand ready to be part of a constructive dialogue and to work collaboratively on policies that protect workers while preserving the small business community that is essential to New York City's economy.

Thank you for your time and consideration.

Hello my name is Sarah Thompson and I am submitting my written testimony in opposition of this bill.

The true and immediate effect of a passing of this type of bill is that thousands of people including the 120+ people I employ would be out of a job and for many people out of purpose.

I am a passionate E-Bike business owner here in NYC. Our method is a new wave that's great for the environment. We are green and lean but mighty and already are a visible niche in the City delivering smiles SAFELY to every corner.

I teetered with the idea to launch my business after being in cargo and logistics for over a decade in the airline industry which also utilizes this same business model. That is another industry where for-profit companies contract out other for-profit companies and dictate eligibility and background screening requirements, wages for employees, scope of work for the company, manage training, 3rd party companies wear parent company uniforms, parent company owns or leases the operating facility, etc. Same model, different industry. The model is not unsafe or the issue here and completely eviscerating it will not make NYC workers or streets safer.

I moved forward with launching my business when I saw a woman that looked like me excel in entrepreneurship. Words can't illustrate how powerful and inspirational it was to see a small business owner female first generation family from the Caribbean a true pillar in the community contribute to true economy and today now that woman is me. I do not subcontract anyone but directly employ every person that joins my team as W-2 employees. I hire people from all walks of life trying to grow and better themselves. I offer 401k, health (medical dental vision) benefits to all my employees including my many part time employees. Tuition reimbursement, child care subsidies, you name it. I offer livelihood and occupation to anyone who needs it. I have hired single mothers in need of flexibility, students wanting to excel in their first job, NYC transplants just trying to get their foot in the door at a place with opportunity to grow in leadership positions. I give grace to the people that need access to decision makers. This Bill by forcing "direct employment" would simply diminish these same voices in a faceless corporate grinder.

This Intro 518 and so much of the surrounding conversation dehumanizes the true touch and impact my company and others like it has on everyday people. It also limits the options Delivery Associates have to go to for employment. This bill doesn't protect workers. Intro 518 will not make anything safer. In plain English it is a war on mom and pop logistic shops. It's literally trying to eradicate small business in a world and society when conglomerations have a monopoly on almost everything, we have resiliently and in partnership etched a way into existence. If you want safer streets with fewer incidents or injuries, in lieu of erasing, just effectively leverage small business as an asset.

It is shameful and almost unethical to pass Intro 518. It is at face value a political agenda against one or two corporations with a full understanding that the small business is disseminated in the wake of the battle and the everyday worker, who you are supposed to be protecting, poetically bears the heaviest blow by being even more exposed to job insecurity.

Hi my name is Joseph Geczi . I live in ManhattanValley . I work in the city every single day. I'm here to tell you that Intro 518 would hurt people like me,. I didn't start where I am now. I started as a driver. I was behind the bike making those deliveries. I learned the Industry from the bottom up. Through hard work, real hard work, I worked my way to management. The DSP model made that possible. It gave me a ladder to climb, but a lot of people in this city never even get shown where the ladder is. That's not a small thing. That's everything.

This bill could end the delivery service partner model by forcing companies like Amazon to directly hire every driver. When that happens, Amazon doesn't suffer. They absorb, they automate, they move on, but I'm gone, my station is gone, and the next driver out there with work ethic and a hunger to move up the way I did, that path is gone too. This bill forces last mile facilities to either make massive operational changes or shut down entirely. I'm not a corporation with a legal team; I'm a guy from the neighborhood who earned his seat at the table one shift at a time. I'm not here defending myself or defending every driver who thinks about the future the way I once thought about mine. I'm defending my boss, a great owner who's built something real, who does right by her employees, who deserves the right to keep running her business the way she's earned the right to run it. Don't close that door. Vote no on intro 518.

Mr Gregory
P&D ISP
ZQU 114
LIC, NY

As owner operator of MvP a privately owned last mile company contracting with FXG for the past 10years, I'll like to say a few words regarding the looming threat of city contracting legislation.

For ten consecutive years my partner and I have poured time, effort and fundamental finance acumen to build a legitimate business. We have paid countless of 941x taxes in the excess of hundreds of thousands for consecutive years, NYC Metro local taxes, Unemployment, CMTV Medallion taxes, etc contributing to NYS coffers. All are required by both NYS & FXG to remain compliant per labor law. Our team members both active current and previous employees have had significant milestones while employed with us such as Mr Murray becoming an NYPD officer, Mr Bruno becoming a police officer in the District of Columbia or Naveed purchasing his first home in Connecticut, or Mr Alvarez having a recent baby girl addition to his family last month. The names I just mentioned were tenured employees (having over 5yrs w/MVP) in which they all got their start in having a real job with me.

We ask our local politicians to keep the status quo. The current model isn't broken so why disrupt. However making revisions can and will not only make it difficult for ISPs such as myself to make a living which margins are already slim to begin with but our staff members won't be able to achieve the American dream of first like pursuing a new home, a car, or delaying or putting off family creation all together.

Moving fwd will likely cause a dream deferred for 1st time milestones, thus impacting a timely progression in one's life of wants and desires lowering their overall quality of life.

Hello,

My name is Mark Facchin, I have lived in Queens my whole life and I currently reside in Douglaston. I own a small package delivery service company and I vehemently oppose the Delivery Protection Act.

I started my first shipping company in April 2013 by purchasing a route that serviced Midtown Manhattan that employed 1 full time driver and 4 full time helpers. Later in 2013, I purchased another route adjacent to my first that employed one full time driver and 3 additional full time helpers. The drivers that were running and managing those routes are still employees of mine 13 years later. From there I grew our logistical business and as of today we currently employ 225 delivery associates, 25 field managers and 10 dispatchers. I believe the most valuable asset of any business owner is their employees.

I have been blessed to be able to grow our business because of the dedication of our people and the AMAZING TEAM we have built. Our management team is not only responsible to make sure our day to day operations run flawlessly but more importantly they are in constant communications with their team members to make sure their work days run as smoothly as possible. DAILY Stand up safety meetings for both our drivers and Walkers are mandatory operating procedures. Making sure each of our employees safety whether on the road while driving or walking on the streets while delivering is our TOP PRIORITY.

The reason I got into this business was because I saw the emerging growth of E Commerce and I felt it was a safe small business to invest into. Owning and running a logistics company requires a lot of up front capital and access to lines of credit to make sure we keep our fleet of trucks current, safe and mechanically sound.

If the Delivery Protection Act becomes law and New York City Council is able to stop our operations how will I and my fellow logistic business owners pay back our loans. While I can not speak for everyone, a lot of us have personal guarantees to the SBA for loans we took to start our businesses and EIDL loans we took during COVID to keep our businesses a float, banks loans and lines of credit and credit card balances to make sure our operating bills are paid.

I own and operate a completely legal business in the State of New York with our own DOT number, carry every mandated insurance only have W2 employees and pay all of our taxes as required in NYC, NYS and the Federal government. What City Council is proposing is to make a draconian law that will force my legal entity to be shut down.

I will close with this, I will be 60 next month, if City Council passes this bill into law how will I be able to support my family?? Who is going to hire 60 year old man?? You will force me bankrupt my companies and in the very near future declare personnel bankruptcy.

This is Mario Nicolaou and I testified on April 9th at city hall. I was given two minutes and quickly rushed out as I am fighting for my life's work and business. My colleagues would start off thanking the council members. I do not! I despise the council for putting me in this position in the first place. This is personal, very personal - anti business, anti NY , anti American and unconstitutional. I have had Sleepless nights worrying about losing my business that I gave everything had to create and build. I am personally offended by the different council members leaving , looking at their phones and bringing their children into the meeting. We our fighting for our lives and livelihood and you clearly don't care and are disrespectful.

In October 2020 in launch my delivery business in NYC manhattan. I went from zero to over 100 w-2 employees in a matter of 45 days. I worked 7 days a week from 5am to sometimes midnight. I have close to 200 hundred W-2 full time employees. My company offers health insurance, matching 401k, Pension plan, tuition reimbursement, and flexible schedules. Every 6 months everyone in the company gets a raise. No performance contingencies. One of my employees goes to Ecuador every year to spend time with his family. He will take off for a month, 2 months and sometimes 3 months. He told me that he loves working with me because I allow him to do this and when he comes back he still has a job. He is one head trainer and delivers quality work. I am currently helping him build a business of his own. I have helped so many of my employees build their skills and qualifications. Most recently one employee was just hired for NYC MTA (you are welcome). I am sure my glaring recommendation letter did not hurt her chances. Another one of my employees worked his way up. I mentored him to own his own business one day. We worked together for 3 years and I gave him a lot of my time coaching and mentoring him because he asked me to. He has been operating his own delivery business upstate NEW YORK for over a year now. He employs 75 full time W-2 employees. (You are welcome). He still contacts me for advice and guidance. I have zero interest in his business and I am happy to help. I am currently helping several employees with letters of recommendation for citizenship for up coming immigration trial. I personally sponsored an individual for citizenship - taking on financial responsibility for that person. One person is seeking asylum. They all earned it in my eyes. They are outstanding employees, great parents, contributors and would be a great addition to our countries citizenship.

For me personally I have been through tremendous financial hardship, a long drawn out divorce, single Dad with 50/50 custody since August 2022 raising two beautiful girls (Daisy-14 and Charlotte-10, I want you to know their names, this is very personal). They are high honor roll students. My business allows me the freedom to be available when they are with me for my week. I have them from a Friday after school to a Friday drop off at school. I make them breakfast and pack them a lunch every morning. I drive them to the bus stop and meet them after school. I spend time with them and cook them a high quality wholesome meal as we talk about our days. This business allows me that time. I work while they are in school. The weeks I don't have them I work extra to get as much done as I can so I can be available for them when I do have them. I have been able to climb my way out of a financial whole and paid for all legal expenses to fight for my right to 50/50 custody with my children (even though NY makes it very difficult for a father, no thank you). This disgrace of a bill will take my business and life style away from me.

I heard a lot of talk about safety. Safety, safety, safety is core in our training - daily monitoring and training, cameras in every truck - DOT regulate - federal regulation. We are in compliance with all NY laws including time off laws. Scorecard weekly monitored daily - 47.5% of the scorecard is driver safety- yes extreme quotas on safety and laws!!seat belts, stop signs/traffic lights, illegal U-turns, speedy , following distance, distracted driving. Weekly meetings reviewing safety/ scorecard, We have satisfaction- anonymous independent survey given to every employee. We have 92% satisfaction rate. We look at and identify areas we can improve. I have a full time employee dedicated to safety and metrics training. Each employee gets a paid 30 minute zoom call training for areas they can improve. The largest part is safety 47.5% of the entire scorecard. We go several weeks without any safety violations or warnings. Our trucks are inspected twice a day. Each driver must send video of the trucks inside and out before they take it out and after they return it. If a truck is dirty that driver will be held responsible. If there is damage that driver will have to give account. There is no hiding. All trucks need to pass inspection before going out. I keep extra trucks in case a truck does not clear. If a driver takes a truck that doesn't pass inspection, they are fully aware that would equal termination. They either knowingly took out a truck that didn't pass or they didn't do a proper inspection either way they are out. We take it very seriously.

This brings me to my next point. Your 518 bill will force companies to give 30 days notice of termination- so you want force companies to keep sexual harassment offenders, drivers with safety violations, blatantly violating traffic laws and safety violations over an over. You want to force companies to keep putting them on the road? Is that smart? Will this reduce safety incidents or increase them?

Code 59 - *** we already have endless regulations and safety precautions. This code forces us to hire a third party company to do a safety audit and make recommendations.

Liability-I heard liability talked about a lot. no liability is avoided, we take all liability and responsibility. Lawsuits and judgments paid would be a strong argument against this point. Your NYC city judges give out millions in awarded lawsuits. What it sounds like to me is you want the ability to sue companies directly. Get rid of the third party so workers, government agencies and citizens can sue these companies directly. There is not a business with any sort of assets that would operate in NYC with direct access to their assets. This is why LLC's, Holding Companies and Trusts exist. You cannot force a company to be exposed to endless liability. They will just choose to not do business in your city. Full stop not worth it.

You say you are against big businesses, your politics clearly go in that direction but you want to put all of these small business owners out of business. Make this make sense. YOU CAN'T!! All of the arguments I heard of why you as a council are clearly jamming down our throats, the bill does not solve any of them. Matter of fact it will make it worse. Safety? Forcing companies to hire direct. How would that make anything safer? I just demonstrated that your bill will force these companies to keep unsafe drivers on the road to give them 30 days before termination. Accountability? You just want the ability to sue bigger companies. That won't happen. Companies and jobs just won't exist in NYC. You already hold us accountable with so many regulations and employees rights. I have to go to trial over and over again to fight undeserved unemployment cases. 34yr old employee sexually harassed a 19 yr old employee with video

evidence. The city granted unemployment. I had to take my time out and go before a judge to get this overturned. It still was a 50/50 shot because it was his "first offense". Luckily this judge had decency and over turned it.

I pay a company \$500 a month just to handle all my unemployment claims or I will be force to pay a higher percentage of unemployment tax.

These employees have more rights than we do. We have to prove everything and they can just make claims and win.

Let's call a spade a spade! The union is pushing and "funding" this bill to target Amazon. We are caught in the middle. - the bill makes no sense. This is all about Amazon. Amazon is your clear target mentioned over and over. Legally you have to include all companies. The mission is clear force Amazon to hire directly so the union can unionize them easier.

You are sided with a corrupt union that has indictment after indictment of union presidents and associates stealing pension money from their people. Most of them are ex mafia and this is who you're backing? I was part of the teamsters union local 2-D. Wine & liquor union. Vincent Fyfe (union president at the time, Vincent Decunto were brought up on charges for embezzlement and stealing members funds. Do they care about their people? I have never heard of a Union that didn't steal from their people. Unions are dying and useless. You sign your right over to them to steal your money and charge you to do it.

Taking pictures with the union Caban and chair council? You are open minded and not swayed in one direction.

This bill cannot pass. It makes no sense. It destroys lives. You met and heard from some of the people it will destroy. This is not what if or theory. It will. Just Wrong!

WRITTEN TESTIMONY IN OPPOSITION TO

INTRO 518-2026 (DELIVERY PROTECTION ACT)

NYC Council Committee on Consumer and Worker Protection

Submitted by: Rudy Cazares

Owner, Cazar Logistics LLC (Amazon DSP) & Joint Ops Logistics, Inc. (FedEx ISP)
Marine Corps Veteran | Elmhurst, Queens Native

April 9, 2026

PART I — ORAL TESTIMONY (AS DELIVERED, APRIL 9, 2026)

The following is the testimony delivered orally before the Committee on Consumer and Worker Protection on April 9, 2026. It is submitted here as part of the official written record.

Good morning — my name is Rudy Cazares. I'm a Marine Corps veteran, a New York City small business owner, and I'm here in opposition to Intro 518-2026 because of its impact on jobs and small businesses in our communities.

I was raised in Elmhurst, Queens, by immigrant parents from Mexico. After serving 15 years in the Marine Corps, including three combat tours in Iraq, I came home and built my business in the communities I grew up in.

Today I operate Cazar Logistics, an Amazon Delivery Service Partner, and Joint Ops Logistics, a FedEx Independent Service Provider.

Since 2020, our team has delivered over 20 million packages across New York City, helping keep this city running during COVID and beyond.

Through Cazar Logistics, we've also made a weekly commitment since July 2023 through a public-private partnership with the NYC Department of Veteran Services, HelloFresh, The Campaign Against Hunger, and Amazon — delivering over 140,000 meals at no cost to the City.

We employ over 100 New Yorkers and have hired over 500 through Workforce1.

These are facts.

I've heard statements suggesting protections like guaranteed rehire between small businesses and parent companies — but any bill is only as good as its execution, and there is no guarantee that workers displaced from one company will be absorbed by another.

I came here today to give testimony — but what I'm witnessing is alarming. I don't know about anyone being forced to be here, but I do know there are hundreds of small business owners and drivers who volunteered to show up, and many of them are being kept outside the gates of City Hall without being heard.

And if this bill moves forward as written, it will shut down hundreds of small businesses like mine across this city.

When small businesses like mine are pushed out, the workers we employ don't win — they lose their jobs, they lose stability, and there are no guarantees of what comes next.

I urge the Council to consider the real impact on jobs and communities before moving this forward.

Thank you.

PART II — SUPPLEMENTAL WRITTEN TESTIMONY

I submit this supplemental testimony to expand on the points I raised orally and to address key arguments made during the April 9th hearing that require a fuller response. The Council deserves a complete record — and so do the hundreds of New Yorkers who were unable to enter City Hall that day to be heard.

A. Who We Are: Small Businesses, Not Corporations

I am not Amazon. I am not a corporation. I am a small business owner, a veteran, a son of immigrants, and a New Yorker — and so are nearly every other Delivery Service Partner (DSP) and Independent Service Provider (ISP) owner who showed up on April 9th.

Intro 518 is being framed as a battle between corporations and workers. That framing is false and dangerous. The businesses that will be eliminated by this legislation are not Amazon — they are the small and mid-size operators like me who took out loans, signed personal guarantees, and built businesses from the ground up to employ New Yorkers in the communities we live in.

The Bronx Chamber of Commerce surveyed just eight Bronx business owners and found that 1,200 jobs would be lost if this bill passes. That number, extrapolated across all five boroughs and all affected DSPs and ISPs, represents a catastrophic and irreversible job loss — falling hardest on the immigrant, veteran, and first-generation business owners who built these operations, and on the hourly workers who depend on them.

My companies alone have:

- Delivered 20 million+ packages across NYC since 2020
- Currently employs 100+ New Yorkers
- Hired 500+ workers through NYC's Workforce1 program

- Delivered 140,000+ meals to veterans and families — at zero cost to the City — through a public-private partnership with NYC DVS, HelloFresh, Campaign Against Hunger, and Amazon

This is who Intro 518 would eliminate. Not Amazon. Us.

B. On Affordability and the Real Cost of This Bill

I want to address something that cannot go unchallenged. Supporters of this bill — including members of this Council — regularly speak about the importance of affordability for New Yorkers. I co-sign that concern completely. Affordability matters. The cost of living in this city matters.

But I am frankly amazed that the same voices advocating for affordability are championing a bill that will unquestionably raise costs and put people out of work.

If this bill passes, delivery costs in New York City will rise. Amazon has said so directly. When operating costs go up — through new licensing fees, mandatory direct employment overhead, and the dismantling of a proven operational model — those costs do not disappear. They get passed on to consumers. The New Yorkers who are already struggling with the cost of living will pay more for the goods they order online. That is not affordability. That is a contradiction.

And I am equally amazed at how this legislation has been constructed. Intro 518 is written to target one company — Amazon — but in doing so, it would kill an entire industry of small businesses. We are the collateral damage of a political fight we did not start and were not invited to solve.

Legislation that targets one corporation and wipes out hundreds of small businesses in its path is not worker protection. It is a blunt instrument being wielded with precision against the wrong people. The workers this bill claims to protect are my workers. And my workers do not want to lose their jobs.

C. This Bill Targets Amazon — But Destroys Every Small Business in Its Path

The core of Intro 518 is a provision that would prohibit companies that operate warehouse facilities from contracting out their delivery work to third parties. That provision is designed to eliminate Amazon's Delivery Service Partner model. But in doing so, it eliminates every DSP — every small business operating under that model — regardless of their performance, their safety record, or their community impact.

Let me be direct: this bill does not just target Amazon. It targets any business owner — DSP, ISP, or otherwise — who does not own or lease their own delivery facility. It upends the entire last-mile delivery industry in New York City. It eliminates an economic model that has created thousands of jobs, opened pathways to business ownership for veterans and immigrants, and kept this city supplied through a pandemic.

Amazon itself testified that if this bill passes, they would consider moving their warehouses out of New York City. The consequences of that alone would be devastating — not only for DSP operators and drivers, but for the more than 25,000 Amazon employees who work at NYC delivery facilities across all five boroughs. The very workers this bill claims to protect would be among the first to lose their jobs.

This is unionization by legislation. The Teamsters — who are the driving force behind this bill — have been unable to achieve unionization of Amazon's DSP workforce through the normal organizing process. This bill is a legislative shortcut designed to force a structural change that the market and the workers themselves have not chosen. It is politics dressed up as worker protection, and it will result in the very job losses it claims to prevent.

D. The April 9th Hearing Did Not Allow for a Fair and Unbiased Process

I am compelled to raise serious concerns about the conduct of the April 9th hearing, because the record is incomplete without them.

Access to City Hall Was Denied to Hundreds of Opponents

The NY Delivers Coalition provided advance notice to the City of our rally on the steps of City Hall. Over 500 people showed up — small business owners, drivers, and workers — the overwhelming majority of whom were not permitted to enter the gates of City Hall. They stood outside for hours. Many, after waiting in the cold with no access to the hearing, became discouraged and left. They came on their own time, on their own initiative, to exercise their right to be heard by their city government — and they were turned away.

Meanwhile, those in support of the bill were ushered into the hearing chamber ahead of those in opposition. Supporters were able to testify earlier in the proceedings while opponents — who had traveled from across the city — waited for hours outside or in holding areas. This is not how a democratic hearing process should work, and it calls into question whether the Council received a representative picture of public sentiment.

The Committee Chair and Bill Sponsor Participated in a Pro-Bill Rally Before Presiding

Committee Chair Harvey Epstein and bill sponsor Council Member Tiffany Cabán both participated in the Teamsters rally in support of Intro 518 immediately before presiding over the hearing. This conduct raises legitimate questions about the impartiality of the hearing process. A presiding official who has publicly demonstrated support for one side of a contested bill before hearing testimony from the other side cannot provide the unbiased oversight that the legislative process requires.

Those of us in opposition were not afforded balanced, open questioning from committee members. The hearing lasted well into the late afternoon — with hours of testimony from

supporters going first — while those against the bill waited. This is not a fair hearing. It is a predetermined conclusion dressed as a public process.

The Mamdani Administration Formally Endorsed the Bill During the Hearing Itself

On April 9th — the very day of the hearing — the Mamdani administration made its first official public endorsement of Intro 518 on the record. Carlos Ortiz, Chief of Staff for DCWP, testified before the Committee that the agency and the Mamdani administration support the bill. This was not a position developed after hearing all testimony. It was communicated at the start of proceedings, before the opposition had fully been heard.

Administrations are entitled to policy positions. But announcing executive support for contested legislation on the opening day of its first public hearing — through the same agency that would administer the licensing regime the bill creates — sends an unmistakable message to committee members about which direction the process is expected to go. That is not a neutral legislative environment. It is a predetermined one.

E. The 'Rehire Mandate' Has No Legal Foundation

DCWP and bill supporters have cited an employee retention clause in Intro 518 as a protection for DSP workers — claiming that if their DSP closes, Amazon would be required to offer them jobs to perform the same work they previously performed.

This argument is legally unfounded and practically unenforceable for the following reasons:

- There is no established legal precedent in New York or under federal law that compels a private company to hire workers from a separate, independently owned business that loses its contract. As the Brooklyn Chamber of Commerce president testified at the hearing, courts would not force a company to hire a specific classification of workers from another legal entity.
- The DSP workers are employees of the DSP — not of Amazon. Any employment relationship that exists is between the worker and the small business owner. There is no legal mechanism in Intro 518 — or in existing employment law — that can transfer that obligation to Amazon automatically.
- The NLRB's ongoing joint employer proceedings involving Amazon and its DSPs remain unsettled. The question of whether Amazon is legally a joint employer has not been finally resolved, and under the current Trump administration's NLRB, the likelihood of a ruling that would support forced hiring is extremely low.
- Under basic employment law, there is no legal requirement that any employer — including Amazon — must rehire laid-off workers from another company. Collective bargaining agreements may require recall provisions, but no such agreement governs the Amazon-DSP relationship.

The 'rehire guarantee' is a political talking point, not a legal guarantee. It provides false comfort to workers who will, in reality, face unemployment with no recourse when their DSP is forced to shut down.

F. The Last-Mile Industry Is Already Regulated by Up to 11 Agencies — What's Missing Is Coordination, Not More Laws

During the April 9th hearing, Zach Miller, VP of Government Affairs for the Trucking Association of New York (TANY), identified that the last-mile delivery industry is already subject to oversight by approximately 11 separate regulatory agencies across federal, state, and city government. Adding a 12th layer of licensing through Intro 518 — without fixing the existing coordination failures — does not protect workers. It creates compliance costs that small businesses cannot absorb, while large corporations hire lawyers to navigate around them.

The agencies already regulating this industry include:

- NYC Dept. of Consumer & Worker Protection (DCWP) — delivery worker pay, minimum pay rates, trip distance rules, tipping laws
- NYC Dept. of Transportation (DOT) — truck routes, vehicle size/weight, loading zones, commercial parking
- NYC Dept. of City Planning (DCP) — zoning and land use for last-mile facilities
- NYC Dept. of Environmental Protection (DEP) — emissions and environmental compliance
- NYC Dept. of Sanitation (DSNY) — street cleanliness, pollution related to delivery ops
- NYPD — traffic enforcement, violations, public safety
- NYS Dept. of Labor (NYS DOL) — wage and hour laws, workers' compensation, unemployment insurance
- NYS Dept. of Transportation (NYSDOT) — vehicle registration, weight permits, highway use tax
- Federal Motor Carrier Safety Administration (FMCSA) — commercial driver licensing, hours of service, vehicle safety
- OSHA — workplace safety standards
- National Labor Relations Board (NLRB) — labor relations, joint employer determinations

Consider what these agencies spend — and what they actually direct toward last-mile enforcement:

- DCWP has a FY2026 budget of \$81.7 million — but it is already so underfunded that it cannot build a web portal for workers to file complaints under new deactivation laws, and needs 34 to 170 new employees it doesn't have. The Mayor proposed cutting DCWP's budget to \$74.7 million for FY2027.

- NYC DOT has a \$1.5 billion FY2026 budget, but only \$6.5 million was allocated to an in-agency delivery enforcement unit — focused primarily on e-bike enforcement, not last-mile warehouse operations.
- NYPD operates on a \$6.14 billion budget with no dedicated last-mile delivery enforcement allocation.
- OSHA's national budget was cut by \$49.9 million in FY2026 to \$582.4 million, with 223 fewer employees.
- The federal Wage & Hour Division — which enforces worker pay protections — was cut by \$25 million and 245 employees.

The NYC Comptroller's own November 2025 report — cited repeatedly by DCWP at the hearing — admitted that enforcement efforts across these agencies 'remain siloed, creating inefficiencies.' The report called for a 'unified structure' and 'cross-agency approach' to address last-mile delivery issues.

The answer to siloed, underfunded enforcement is not a 12th licensing regime on top of the existing 11. The answer is to fund and coordinate the agencies that already have the authority. That is where the Council's energy should go.

G. The Comptroller Report Referenced at the Hearing Was Incomplete — and Committee Members Did Not Have Full Information About How the DSP Model Works

The November 2025 Comptroller report, 'Fast Shipping, Slow Justice,' was cited repeatedly during the hearing as justification for Intro 518. But that report did not fully account for how the DSP and ISP operating model actually functions — and committee members demonstrated, through their questions, that they lacked a complete understanding of the model before the hearing began.

Key facts the report and the hearing discussion did not adequately address:

- Delivery Service Partner (DSP) and Independent Service Provider (ISP) owners like me operate independently. We hire our own workers, manage our own schedules, maintain our own fleets, and are responsible for our own operations. We are not Amazon employees, and our workers are not Amazon workers.
- We sign personal guarantees and take on significant financial risk — loans and lines of credit — to build these businesses. When this bill eliminates the model, that debt does not disappear. It falls on us.
- The safety data cited in the Comptroller report conflated crashes near last-mile facilities with crashes caused by delivery vehicles. These are not the same thing. Amazon's own testimony cited a 43% improvement in Recordable Incident Rate and a 70% improvement in Lost Time Incident Rate since 2019 globally, calling the safety allegations a 'misconception.'

- The report acknowledged that enforcement is currently siloed and ineffective — yet the proposed solution, a new licensing regime under DCWP, does not fix the coordination problem. It simply adds to it.

Legislation of this magnitude — affecting hundreds of businesses, thousands of jobs, and the entire last-mile delivery ecosystem in New York City — should not move forward based on an incomplete evidentiary record. The Council should commission a full, independent economic impact study before taking any further action on this bill.

H. A Path Forward That Actually Protects Workers and Preserves Jobs

I want to be clear: I share the Council's goals. Worker safety matters. Fair pay matters. Clean air matters. The environment matters. I am working toward electrifying my fleet. My company has delivered 140,000 meals to veterans and families because I believe in giving back to the community I serve.

But Intro 518 as written does not achieve these goals. It eliminates the businesses that are already pursuing them.

At the hearing, a path to compromise began to emerge. The Brooklyn, Bronx, and Manhattan Chambers of Commerce, along with TANY, offered constructive alternatives:

- Eliminate the direct hire mandate — which has no legal enforceability and would trigger business closures — and instead regulate worker quotas and delivery expectations
- Establish city-wide baseline driver safety training standards that apply across the industry — without outsourcing that training to external organizations or eliminating the DSP and ISP model
- Fund and coordinate the existing 11 regulatory agencies before creating a 12th licensing layer
- Convene a working group that includes DSP and ISP owners — not just union representatives and Amazon — to develop policy that reflects how the industry actually operates
- Commission an independent economic impact study before any vote on this bill

I came to City Hall on April 9th not just to oppose a bill. I came to be part of the solution. I am asking the Council to give us that opportunity — fairly, openly, and with all the facts on the table.

CONCLUSION

I am a Marine. I served this country for 15 years. I came home and built something — not for myself, but for my community, my workers, and my family. What I built is real. The hundreds of jobs I provide every year are real. The 500+ people I've hired through Workforce1 are real. The 140,000 meals we've delivered are real.

Intro 518 as written would destroy what I built — not to protect my workers, but to serve a political agenda that has nothing to do with their actual well-being.

When small businesses like mine are pushed out, the workers we employ don't win. They lose their jobs, they lose stability, and there are no guarantees of what comes next.

I urge this Council to pause, to listen to all stakeholders — including the hundreds who were turned away from City Hall on April 9th — and to pursue a path that protects workers without destroying the small businesses that already employ them.

Thank you.

Respectfully submitted,

Rudy Cazares

Owner, Cazar Logistics LLC & Joint Ops Logistics, Inc.

Marine Corps Veteran

Elmhurst, Queens Native

From: [Randy Peers](#)
To: [Rudy Cazares](#); [District2](#); [District13](#); [District32](#); [District42](#); [District6](#); [District10](#); [District49](#); [District25](#); [District36](#); [District22](#); [bp@bronxboropres.nyc.gov](#); [info@brooklynbp.nyc.gov](#); [mbpinfo@manhattanbp.nyc.gov](#); [bprichards@queensbp.org](#); [siBP@statenislandbp.nyc.gov](#); [Testimony](#)
Cc: [lisa@bronxchamber.org](#); [info@manhattancc.org](#); [Queens Chamber of Commerce](#); [lbaran@sichamber.com](#); [mayor@cityhall.nyc.gov](#); [pressoffice@cityhall.nyc.gov](#); [dcwp@dcwp.nyc.gov](#); [Zach Miller](#); [Mata, Yesenia \(DVS\)](#); [Chan, Kitty \(SBS\)](#)
Subject: [EXTERNAL] RE: Written Testimony in Opposition to Intro 518-2026 — Rudy Cazares, Cazar Logistics LLC & Joint Ops Logistics, Inc.
Date: Monday, April 13, 2026 4:03:23 PM
Attachments: [image002.png](#)



Thank you Rudy for your leadership on this.

As I stated at the hearing, the issue of licensing these facilities is a “Red Herring”, and the real issue is the direct hire mandate that will put businesses like yours out of business. Never in my thirty years of NYC public service work have I come across legislation that will put a whole economic sub-sector out of business. This notion that all your workers will be “hired” (not re-hired since it’s a totally different company), is false, and will not hold up in court. Facilities are also likely to move to Nassau County or NJ, and the deliveries will come from further away in larger trucks.


Doctors have a Hippocratic Oath to “do no harm.” NYC Councilmembers should have a similar oath.

In solidarity,

Randy Peers

President & CEO

Brooklyn Chamber of Commerce

 -- www.brooklynchamber.com

From: Rudy Cazares <Rudy@CazarNYC.com>

Sent: Monday, April 13, 2026 9:06 AM

To: District2@council.nyc.gov; District13@council.nyc.gov; District32@council.nyc.gov; District42@council.nyc.gov; District6@council.nyc.gov; District10@council.nyc.gov; District49@council.nyc.gov; District25@council.nyc.gov; District36@council.nyc.gov;

District22@council.nyc.gov; bp@bronxboropres.nyc.gov; info@brooklynbp.nyc.gov; mbpinfo@manhattanbp.nyc.gov; bprichards@queensbp.org; siBP@statenislandbp.nyc.gov; testimony@council.nyc.gov

Cc: lisa@bronxchamber.org; Randy Peers <rpeers@brooklynchamber.com>; info@manhattancc.org; Queens Chamber of Commerce <tgrech@queenschamber.org>; lbaran@sichamber.com; mayor@cityhall.nyc.gov; pressoffice@cityhall.nyc.gov; dcwp@dcwp.nyc.gov; Zach Miller <zach@nytrucks.org>; Mata, Yesenia (DVS) <yemata@veterans.nyc.gov>; Chan, Kitty (SBS) <katchan@sbs.nyc.gov>

Subject: Written Testimony in Opposition to Intro 518-2026 — Rudy Cazares, Cazar Logistics LLC & Joint Ops Logistics, Inc.

iWise Consulting

Warning: Sender @Rudy@CazarNYC.com has never sent any emails to your organization.

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To the Committee on Consumer and Worker Protection:

Please find attached my written testimony in opposition to Introduction 518-2026, the Delivery Protection Act, submitted for the official record following the Committee hearing held on April 9, 2026.

This submission is being filed via email to testimony@council.nyc.gov.

My name is Rudy Cazares. I am the owner of Cazar Logistics LLC, an Amazon Delivery Service Partner, and Joint Ops Logistics, Inc., a FedEx Independent Service Provider — both based in the Bronx, New York. I am also a Marine Corps veteran and a lifelong New Yorker, raised in Elmhurst, Queens by immigrant parents from Mexico.

I testified orally before the Committee on April 9, 2026. This written submission includes the full text of my oral testimony as delivered, as well as supplemental testimony addressing key arguments raised during the hearing that warrant a fuller response for the official record.

The attached document addresses the following:

- The economic and community impact of Intro 518 on small Delivery Service Partner and Independent Service Provider businesses across New York City
- The lack of legal enforceability of the bill's proposed employee retention/rehire mandate
- Concerns regarding the conduct and impartiality of the April 9 hearing process
- The existing regulatory framework already governing last-mile delivery — currently overseen by approximately 11 agencies — and why a 12th licensing layer without coordination reform is

insufficient

- A constructive path forward that protects workers without eliminating the small businesses that already employ them

I respectfully request that this testimony be entered into the official record of the Committee's proceedings on Intro 518-2026.

Thank you for the opportunity to be heard.

Best Regards,

Rudy Cazares

President & Founder

Cazar Logistics LLC, an Amazon Delivery Service Partner

90-30 Metropolitan Avenue Suite 3 #1096

Rego Park, NY 11374



Rudy@CazarNYC.com

LinkedIn Profile: www.linkedin.com/in/rcazares0302





To: Members of New York City Council

From: Dr. Michael McQuarrie, Director of the Center for Work and Democracy, Jonathan Rosenblum, Visiting Scholar at the Center for Work and Democracy and Amazon Delivery Driver, and Dr. Benjamin Fong, Program Director for “Labor and Logistics” and Associate Director of the Center for Work and Democracy

RE: Delivery Protection Act

April 9, 2026,

Dear Members of Council,

We write to you today regarding the proposed “Requiring the licensing of last-mile facilities” bill, (hereafter, the “Delivery Protection Act”, or Bill #0518-2026), which is under consideration by the Council. We write as experts on logistics and Amazon, and in the case of Mr. Rosenblum, as an Amazon delivery driver. At the Center for Work and Democracy we conduct extensive research on the logistics industry including, but not limited to: employment practices, health and safety, working conditions, employee surveillance, package flow, workflow, impact of logistics operations on communities, implications of logistics activity for the economy, the relationship of industry practices to regulatory regimes, and the implications of logistics practices for the labor movement and working people generally. Our support for Bill #0518-2026 is borne out of the direct driving experiences of one of us (Rosenblum), as well as hundreds of conversations and interviews we, collectively, have had with drivers in New York City and around the country in the last two years, and our ongoing monitoring and analysis of operations at major logistics companies.

We write to you today to express our wholehearted support for the proposed Delivery Protection Act. The legislation is sure to be controversial with many big businesses because of how it limits the ability of companies to organize their relationship with their employees and subcontractors. Regulation is generally frowned upon by businesses and is often understood to impose costs on business operations that are ultimately borne by consumers. With this in mind, the key question is a simple one: do the benefits of the legislation outweigh the costs on firms? Before answering this, it is worth noting that arguments like these have been used to constrain or roll back government regulation of firms generally. Consequences of the rollback include increased profits for companies, but also rapidly accelerating inequality, declining tax bases, and greater risks and a lower quality of life for many voters. New York City has already seen the consequences of logistics operations in the form of greater

convenience, but also blocked streets, higher pollution, building spaces given over to processing deliveries, declining retail occupancy, and declining accountability to local governments.

The proposed Delivery Protection Act deals with a central practice in the logistics industry that enables companies to avoid regulatory and legal regimes that are designed to protect workers and communities, namely, a particularly insidious form of subcontracting. Subcontracting can serve many economic purposes, including operational efficiency and market flexibility. In the case of many logistics companies like Amazon, however, the subcontracted delivery companies are entirely subject to Amazon's organization of work, cost structure, and efficiency demands. The subcontractors are, then, not being utilized because of any sort of operational expertise, but because they enable the logistics firm to avoid risks and responsibilities for things like accidents on the road, unsafe working conditions, risks to urban neighborhoods from the demands of the work, and legal liability. In other words, the subcontracting system does not bring economic value or greater accountability; it is a tool for shifting costs onto subcontractors, workers, and communities while avoiding any liability for the consequences of Amazon's work regime. The contrast with a company that largely handles deliveries in-house, like UPS, is stark. For the most part, UPS takes responsibility for its drivers and their actions, pays its workers a living wage, and is an easily recognizable brand in the communities in which it operates.

Amazon claims that the drivers are not their employees, but rather are employees of Delivery Service Partners (DSPs), the businesses that Amazon contracts with for last-mile delivery. But a plain review of the facts demonstrates that this simply is not true. Instead, subcontracting, as practiced by Amazon, is merely a legal term of art that enables the company to avoid liability and accountability. To wit, Amazon's drivers report to an Amazon delivery station for their daily assignments; they are required to wear Amazon-branded uniforms and drive Amazon-branded vehicles; they are trained by Amazon employees on Amazon work rule requirements, including specific instructions on driving standards, delivery and documentation requirements. Once clocked in for work - via an Amazon-required biometric scan - Amazon drivers are given a route assignment determined by Amazon, shared with the driver on the Amazon Flex app, with precise instruction about routes of travel, order of delivery stops, where to place each customer package, and expectations for time of route completion. To meet Amazon's oversight requirements, delivery drivers are surveilled constantly at work, via the in-cab Netradyne cameras that Amazon requires DSPs to install in every delivery vehicle. Netradyne and associated tracking technologies in each van determine whether the worker is driving at an appropriate speed, using turn signs, stopping at stop signs, using their seat belt, following at a safe distance, and otherwise complying with Amazon's driving standard requirements. In addition, Amazon's Netradyne cameras track driver head and eye movements continuously to

determine whether the driver is engaged in “distracted driving.” All of the data tracked by this surveillance system is sent to Amazon, not directly to the DSP. The data is reviewed by Amazon’s AI technology, and feedback is provided by Amazon to the driver, in some cases immediately. For instance, Amazon will provide instantaneous feedback to the driver via the Amazon Flex app if the driver appears to have placed the package in the incorrect location. Driving or delivery infractions lead to discipline. Amazon determines the level of infraction and therefore the severity of discipline. For instance, Amazon considers going through a red light or distracted driving a major infraction; fast acceleration is considered a minor infraction. DSP supervisors have been known to tell drivers that they are required by Amazon to mete out discipline. In some cases the driver is required to attend an Amazon safe driving course before they can be put back on the schedule.

While it is clear from these examples that Amazon is the company organizing the work, the surveillance regime also suggests that Amazon is concerned with safety. However, that is belied by the way incentives work for the subcontractors. Amazon’s delivery model sets DSPs in intense competition with one another, thereby compromising the safety of drivers and members of the public. Because Amazon holds total control over the DSPs survival, while having to compete with many other DSP companies, DSPs have an incentive to deploy defective vehicles. Inactive vehicles cost the DSP money, and potentially could cost them their business. For instance, drivers across the country have reported to us (as well as widely on social media platforms) that many of the dispatched vehicles have brake or engine problems; have backup cameras or side mirrors that don’t work; have defective doors or fenders at risk of falling off; and other problems that would normally require immediate repairs. However, because DSPs know that Amazon will penalize them if they don’t get all of their routes completed, many DSP owners tell drivers not to report vehicle defects. Or, they will tell drivers who report defects to “make do” with the vehicle and complete their deliveries. If Amazon were to be legally declared the direct employer of the drivers, as called for under the Delivery Protection Act, then the problem of unsafe vehicles would be minimized, because Amazon would have a powerful incentive to ensure that vehicles were safe, knowing that they would be held liable for accidents or injuries resulting from the unsafe vehicle condition. But under the current arrangement, Amazon denies legal responsibility for the condition of the vehicles, and DSPs, on constant tenterhooks with the company, have a powerful incentive to look the other way on vehicle defects. This adds up to more dangerous delivery vehicles on our roads today, and is a recipe for tragedy.

Amazon claims that DSPs are entrepreneurs, and that the company is simply supporting small businesses. But in practice, the DSPs have little of the authority or decision-making that one would imagine for a small business. There are about 3,000 DSPs working for Amazon nationwide and they are in intense competition with one another. DSP operators know that liability or poor performance will just cause their “at will” contract to be dropped and

they will be replaced by another. Amazon assigns each DSP a set of routes in a geographic area based out of a particular delivery station. Amazon grades DSPs based on overall performance, using the same metrics that drivers are judged by, including on-time delivery rate, safety scores, customer feedback, and delivery success rates. DSPs with good metrics are given more routes and allowed to expand; DSPs with poor metrics are given less work; in some cases, Amazon has shut down DSPs with only a day's notice. DSP supervisors, at the daily "stand-up" meeting with drivers heading out to their routes, remind drivers that their jobs could be in jeopardy if, in aggregate, the DSP scores low on Amazon's metrics. Amazon's last-mile delivery model turns DSPs not into independent business owners, but rather taskmasters with almost no independent latitude who are responsible for whipping drivers in Amazon's labor discipline system.

The Delivery Protection Act would end practices that harm workers, communities, and more responsible firms in the delivery space. Regulation should reward responsible companies and punish irresponsible ones. The practices in the logistics industry are changing fast, and for some companies the goal is simple: reduce accountability to enable an unconstrained flow of goods, regardless of the costs. These practices should be reined in to protect New Yorkers from unaccountable and fly-by-night operators that allow bigger firms to avoid accountability for the consequences of their relentless work regimes. Bill #0518-2026 is well-designed to achieve this purpose. We enthusiastically encourage the Council to pass the proposed bill.

Sincerely,

Dr. Michael McQuarrie, Director of the Center for Work and Democracy (mmcquarr@asu.edu)

Jonathan Rosenblum, Visiting Scholar, Center for Work and Democracy; part-time delivery driver, Washington State (jonathanr4212@gmail.com)

Dr. Benjamin Fong, Program Director for "Labor and Logistics" and Associate Director of the Center for Work and Democracy (byfong@asu.edu)



Consortium for Worker Education

305 Seventh Ave, Third Floor, New York, NY 10001
212.647.1900 | www.cwe.org

Testimony to the Committee on Consumer and Worker Protection in Support of the Delivery Protection Act - April 9th, 2026

Good morning Chair Epstein, Council Member Cabán, and members of the Committee on Consumer and Worker Protection. My name is Drew Weber, and I am testifying on behalf of the Consortium for Worker Education. CWE serves as the workforce development arm of the NYC Central Labor Council, partnering with 33 unions and their respective locals on training, education, and child care programs.

We are testifying today in strong support of the Delivery Protection Act. Amazon's Delivery Service Partner program has allowed the company to sidestep its obligations to workers, denying them the rights and protections they are entitled to. This bill addresses that directly through the establishment of licensing standards, direct employment requirements, and a robust, independent training mandate.

We are particularly encouraged by the bill's requirement that the Department of Consumer and Worker Protection designate nonprofit training providers to educate workers on safety and their rights, and that those providers retain ultimate discretion over training content. This is essential. For workers to exercise their rights, they must first know what they are. When training is offered only by the employer, there is an inherent misalignment between what the company wants workers to know and what they are entitled to know under the law.

CWE has seen this firsthand. Our program, the Astoria Worker Project, is partnering with organizers from Amazon Labor Union Local 1 to educate members through a peer-to-peer model on their rights under the Warehouse Worker Protection Act. We are doing this precisely because that kind of independent, worker-centered education cannot come from the employer itself.

To strengthen this provision, we recommend that the Council add an explicit requirement that designated training organizations have demonstrated experience in know-your-rights education, covering workers' protections under labor and employment law. The bill's training framework is strong. Adding this requirement would ensure that the organizations trusted to implement it are equipped to meet all the expectations set out under the law.

CWE looks forward to supporting the passage and implementation of this bill. Thank you.

NYC Council Committee on Consumer and Worker Protection
250 Broadway, 8th Floor
New York, NY 10007

April 2, 2026

To Council Member Harvey Epstein, Chair of the Committee on Consumer and Worker Protection and Members of the Committee,

My name is Britney Moss, and I am the owner of Cupcake Me, a small bakery business based in the Bronx. I started Cupcake Me in 2017 after leaving my job with a hotel chain because I wanted to spend more time with my daughter. What began with me baking cakes for a few corporate clients turned into something much bigger when I decided, at 27 years old, to take a chance on myself and build my own business.

While I've been able to keep the lights on for the last nine years, things haven't always been easy. I invested my life savings to open a brick-and-mortar storefront in the Bronx when I first started out, but unfortunately, like so many other businesses, we had to make the difficult decision to close during the COVID pandemic.

I had to completely rethink how to survive. I moved Cupcake Me's operations into a basement kitchen and shifted to running my business fully online. That's when things started to turn around.

At the end of 2022, I connected with DoorDash and was introduced to DashMart, their virtual convenience store. At the time, I didn't know much about it, but I was willing to try anything to keep my business going, so I partnered with DashMart to help market, stock, sell, and deliver Cupcake Me products to customers in New York. I started small, just selling what I had left on hand, and it worked.

Today, close to 70 percent of my business comes through DoorDash and DashMart sales. A partnership that started as a way to save my business ended up helping me grow my business – and thrive. Thanks in large part to DashMart, I've expanded Cupcake Me far beyond New York City and entered into other markets, including Maryland, Pennsylvania, New Jersey, upstate New York, and Virginia, with plans to grow even further.

For my business, access to customers through DashMart has been everything. Without it, I don't know if Cupcake Me would still be here today.

That's why I'm concerned about Intro 518-2026, which proposes new regulations for "last-mile facilities", including DashMarts. The bill treats giant warehouses and small, virtual convenience stores the same, and the requirements in the bill for all kinds of "last-mile facilities" are extreme. As a result, the bill is likely to cause smaller facilities to close when the costs of continuing to operate become prohibitive, which they undoubtedly will. I went through this myself when I opened and then had to close a storefront when I couldn't make the economics work. So, I get it.

For Cupcake Me, losing DashMarts not only means forfeiting the partnerships I have forged, but also laying waste to the careful ecosystem I have built. It means the growth I have worked so hard for and the

business I have invested my entire life savings in are at risk. Through DashMarts, Cupcake Me has thrived. I fear what would happen without it.

I've already experienced what it's like to lose a major part of my business during COVID. But platforms like DoorDash gave me a path forward when I needed it most. Policies, like the ones proposed in Intro 518-2026, that make it unworkable for things like DashMartsto exist could take that opportunity away, not just from me, but from many other small business owners trying to make it work in this city.

I urge the Council to take a close look at how this legislation could destroy small businesses like mine.

Sincerely,
Britney Moss
Owner, Cupcake Me
Bronx, New York



April 10, 2026

Chair Harvey Epstein
Committee on Consumer & Worker Protection
NYC City Council
250 Broadway
New York, NY 10007

RE: DoorDash Testimony in Opposition to NYC Int 518 (Delivery Protection Act)

Dear Chair Epstein and Members of the Committee:

On behalf of DoorDash, I am writing to provide testimony regarding Int 518, which creates new requirements for “last-mile facilities” operating in New York City. We share the Council’s interest in improving street safety for all New Yorkers, but we oppose this bill. As currently drafted, Int 518 is so broad that it likely covers facilities and workers that it should not cover, in the process treating massive warehouses and small convenience stores exactly the same.

For DoorDash, those one-size-fits-all requirements could make neighborhood-scale DashMart operations economically nonviable – if a court or regulator determines Int 518 applies to them. By layering on major new costs and operational mandates designed for large, facility-based delivery workforces, not the flexible, multi-merchant delivery model that serves DashMart customers today, the bill could force DoorDash to curtail some operations and shutter others. That’s an outcome that ultimately would hurt small businesses, families, and delivery workers in New York.

We respectfully urge the Committee to reject this bill as drafted. Thank you for the opportunity to share our perspective on this important issue.

DoorDash connects New Yorkers to the best their City has to offer

DoorDash is a technology company and a local commerce platform that helps connect people to the best of their communities. We partner with local businesses to help them reach more customers, grow sales, and operate more efficiently, and we enable New Yorkers across all five boroughs to access the essentials they need both conveniently and affordably. We also support flexible earning opportunities for Dashers, the couriers who complete deliveries facilitated by the DoorDash platform. Every year, DoorDash facilitates millions of deliveries in New York City, and we are committed to doing our part to ensure that everyone who uses our platform has a safe and positive experience.

I. Int 518 likely applies to facilities it should not cover

While clearly intended to address issues at massive fulfillment centers in mostly industrial parts of the City, Int 518 also likely applies to much smaller facilities that are fundamentally different in scale and function. Under the bill, modest, neighborhood-scale locations – not anyone’s idea of “last-mile facilities” – and sprawling warehouses are treated the same. The bill’s one-size-fits-all approach obscures the very real differences between these types of facilities and extends requirements designed to regulate larger facilities to a host of smaller, incomparable ones.

A. DashMart locations may be covered by the bill, but shouldn’t be

The five DashMart locations that operate in the city are among the facilities that should not be covered by this bill but likely are. These are delivery-focused convenience stores that help New Yorkers access everyday essentials efficiently. Customers shop the aisles virtually and place delivery orders through the DoorDash app. These are not giant warehouses.



The DashMart location at 21 Astor Place in Manhattan. (Credit: Google Maps)

When a DashMart receives an order, sortation associates – who are directly employed by DashMart – gather the items ordered and prepare them for delivery. Then, a Dasher – operating as an independent contractor and not employed by DashMart – picks up the order and delivers it to the

customer. In other words, ordering from a DashMart is like making a late-night bodega run, but without the part where the customer goes to the bodega.

B. Int 518 could make DashMart operations nonviable

Int 518 would impose a set of requirements that may be workable for large fulfillment warehouses with dedicated, facility-based delivery staff, but that do not fit neighborhood-scale virtual convenience stores like DashMart. In particular, the bill layers on major new costs and operational burdens, including:

- **Direct employment of delivery workers who deliver from the facility.** DashMart deliveries are completed by Dashers who, on a given day, typically deliver from many different businesses across the city and only occasionally pick up from DashMart. Requiring DashMart to directly employ delivery workers who may complete only a handful of deliveries per month from DashMart is not a workable fit for this business model.
- **Mandatory training requirements and ongoing compliance tracking.** The bill's training mandates are structured around a workforce attached to a single facility. Applying those requirements to a flexible delivery network would create significant administrative and cost burdens that are disproportionate to DashMart's scale and function.
- **Significant record-keeping and other compliance obligations, including costly bonding requirements if independent contractors are used.** If DoorDash continued to facilitate DashMart deliveries completed by independent contractor Dashers, Int 518 would trigger extensive recordkeeping requirements and, critically, require posting a \$500,000 bond per non-employee delivery worker. The costs associated with these new requirements would fundamentally undermine the economics of continuing to operate these neighborhood-scale facilities, even though the requirements don't make sense for and are not well-suited to the type of operations happening at DashMart.

Int 518 is designed to regulate big, industrial facilities where heavy equipment and large vehicles are present, and where dozens (or even hundreds) of workers process thousands of packages each day. The bill's requirements may be workable in large fulfillment settings, but they risk making smaller operations like DashMart nonviable.

C. DashMart helps 102 New York City small businesses grow and thrive

In addition to major brand names, DashMart also carries goods from local businesses. The five DashMart locations in New York City stock, market, package, and facilitate deliveries of products of 102 New York City small businesses. For many of these businesses, DashMart represents a critical pipeline they rely on to reach their customers. Moreover, DashMart helps them grow their

businesses without having to set up their own storefronts or incurring logistical costs that would eat into their profits.

But if Int 518 passes, and DashMart locations are forced to close, these 102 entrepreneurs will bear the brunt of the consequences. Losing access to DashMart means losing access to customers. For some of these businesses, the results could be devastating, and businesses they have poured their hearts and souls into could be at serious risk of closing.

D. DashMart directly employs 84 people across three boroughs

While Int 518 requires facility operators to directly employ people performing “core warehouse services” at last-mile facilities, it may end up causing DashMart employees to lose their jobs. DashMart already directly employs the associates who pick and pack orders in these stores. However, Int 518’s delivery-worker employment mandate (combined with the bill’s training, recordkeeping, and bonding requirements) could make continued operation of these neighborhood-scale facilities economically infeasible and administratively unworkable. That’s because the bill may lead to the closure of the five DashMart locations in New York: two in Manhattan, two in Brooklyn, and one in Queens. That includes all 84 DashMart employees who manage and staff the stores, several of whom have been in their positions for years.

II. Int 518 applies to workers it should not cover

Int 518 is designed to address workers who routinely make deliveries from last-mile facilities, but it also may sweep in thousands of delivery workers who shouldn’t be covered, including Dashers, the independent contractors who complete deliveries facilitated through the DoorDash platform. While Dashers primarily make deliveries from multiple third-party merchant locations around the City, they occasionally pick up orders from facilities that may be covered by the bill (even though they shouldn’t be, as addressed above), including DashMarts.

In practice, Dashers in New York City complete a diverse mix of deliveries on any given day, picking up from restaurants, grocers, pharmacies, and other neighborhood businesses. But they also pick up from DashMarts, though typically much less frequently. Nevertheless, the bill would require each DashMart to directly employ Dashers who deliver just a few times a month from a DashMart. This requirement reflects a core mismatch in Int 518: it assumes a stable, facility-based delivery workforce. That is not how delivery work functions for DashMart orders, which are completed by Dashers who are not assigned to a single facility and who deliver from many different businesses across the city.

Given that most Dashers spend most of their time delivering from other places, requirement does not make sense. The policy framework in this bill erroneously assumes that these workers are dedicated, facility-based delivery staff and does not distinguish between types of delivery work.

III. Shutting New York’s DashMart locations also would reduce delivery efficiency, affordability, and earning opportunities

Although the 102 New York City small businesses who sell their products through DashMart likely would face the worst of Int 518’s many unintended consequences – to say nothing of the 84 DashMart employees who could lose their jobs – the bill is likely to create several additional problems for New Yorkers. For example, closing DashMarts could also mean:

- **Fewer batched deliveries.** DashMart orders are frequently completed by Dashers in conjunction with orders from other stores. This helps create efficiencies for customers and for Dashers, and it helps reduce congestion by batching orders that otherwise would be completed by several different individuals. Batching means cheaper deliveries for customers and more efficient, higher-paying offers for Dashers.
- **Fewer earnings opportunities for Dashers.** Fewer orders and less efficient routes may reduce available delivery demand. That means Dashers could miss out on earnings opportunities they are able to access today.
- **Fewer options – and more expensive deliveries – for New Yorkers.** DashMarts are virtual convenience stores, and without them, customers may have to order from multiple locations to receive the same set of goods – and they’ll likely have to pay more.
- **Fewer orders from local businesses.** When deliveries become less efficient, they become less affordable. When deliveries are less affordable, customers order less. That means fewer orders for local businesses.

By incentivizing less efficient deliveries, Int 518 may lead to more trips, more vehicle miles traveled, more congestion, and more emissions. Closing conveniently located, neighborhood-scale facilities does not reduce traffic. In fact, it can increase it by forcing longer, less efficient routes and more separate deliveries to accomplish the same shopping needs. That is the exact opposite outcome from the one this bill hopes to achieve.

DoorDash urges the Committee and the Council to oppose this bill

DoorDash respectfully requests the Committee and the City Council oppose Int 518. The bill’s broad approach may unintentionally cover workers and facilities it was not designed to regulate – including DashMarts – and could force the closure of five DashMart locations. That would mean cutting off a critical pipeline to customers for 102 New York City small businesses that sell their products through DashMart. It would mean putting the jobs of 84 DashMart employees at risk. And it would mean making many of the very problems the bill is supposed to address – from street safety to harmful emissions to traffic and congestion – potentially far worse.

We stand ready to work with the Council and stakeholders on a more targeted approach that advances safety and accountability without harming local workers, small businesses, consumers, or delivery workers. Thank you again for the opportunity to share our position on Int 518.

Sincerely,

Ivan Garcia

Head of Government Relations, New York City
DoorDash, Inc.

My name is Djon-Megan Hodgson, and I am the Operations Manager for Elite Express Logistics LLC, operating out of Staten Island.

I am also an immigrant who began my journey in the Delivery Service Partner (DSP) program as a delivery associate. Through hard work, consistency, and the opportunities this program provides, I was able to grow into a leadership position. My long-term goal is to become a DSP owner myself—something this program has made possible for many individuals like me who are willing to put in the work.

Elite Express Logistics currently employs 85 individuals in New York. These are stable, reliable jobs that provide income, structure, and opportunity for growth. Bill 518 puts these jobs at serious risk. If DSPs are forced to reduce operations or shut down entirely, it would directly impact not only our employees but also their families and communities.

Beyond employment, there are serious safety concerns that must be considered. DSPs operate on a smaller, more manageable scale, which allows us to closely monitor driver behavior, enforce safety standards, and maintain our fleet effectively. As an Operations Manager, I oversee driver safety, compliance, and vehicle conditions daily. This level of oversight ensures accountability and helps reduce risks on the road.

If DSPs are pushed out, there is a real concern that operations could shift into larger, less controlled structures where this level of detailed oversight is more difficult to maintain. This could lead to increased safety risks for drivers, pedestrians, and the general public.

The DSP model creates opportunity, promotes accountability, and supports local employment. It has allowed people like me—who started as a driver—to build a meaningful career with a clear path toward business ownership.

I respectfully urge you to consider the real-world impact of this bill on workers, small business opportunities, and public safety, and to oppose Bill 518.

Thank you for your time and consideration.



Testimony of Leah Archibald

Executive Director, Evergreen: Your North Brooklyn Business Exchange

NYC Council Committee on Consumer and Worker Protection

April 9, 2026

For decades, New York City's industrial economy has served as one of the most reliable engines of opportunity for working-class New Yorkers. In neighborhoods like Greenpoint and Williamsburg, food manufacturers, wholesalers, and distributors form a critical backbone of both the local and citywide economy. These businesses are not abstract supply chain actors—they are the companies producing baked goods, beverages, specialty foods, and distributing groceries that stock our bodegas, supermarkets, and restaurants every single day. **We are writing to express our concern that unless the Last Mile legislation scope is narrowed, these businesses will be unintentionally subjected to unworkable compliance regulations that may imperil their business operations in NYC.**

What We Do

Since our founding in 1982, Evergreen has evolved alongside the City. We began by improving public safety in industrial areas, then became experts in incentive programs, helping hundreds of businesses grow. When the City created the IBZ program, we were selected to serve North Brooklyn. During the 2008 recession, we partnered with the City to acquire industrial property, and today we operate five buildings—32,000 square feet—leased below market to small manufacturers to preserve jobs.

In 2024, Evergreen served 178 industrial businesses, with 113 firms receiving one-on-one assistance on 187 issues ranging from financing and regulatory compliance to real estate and government navigation. We helped 11 businesses apply for 23 incentive programs, assisted 32 businesses with financing consultations, and helped 6 firms secure \$376,790 in loans and grants to stabilize and grow their operations.

The businesses we assist are not small in their impact. A recent economic analysis found that **the businesses Evergreen served in 2024 support approximately 3,300 jobs across New York City and generate roughly \$1.2 billion in economic activity annually.**



EVERGREEN

Your North Brooklyn Business Exchange

In North Brooklyn alone, industrial businesses support nearly 48,000 jobs and generate approximately \$15 billion in economic activity annually across New York City. These jobs pay average wages of approximately \$108,000, significantly higher than the Brooklyn average. The firms Evergreen served in 2024 support 3,300 jobs and \$1.2 billion in output across NYC. These are accessible, living-wage jobs—often held by immigrants, workers of color, and workers without college degrees—and they remain one of the most reliable pathways to economic mobility in this city, where cost of living continues to rise in many neighborhoods.

What's At Stake

North Brooklyn is home to numerous **small and mid-sized food producers and distributors**, many of whom operate out of shared industrial buildings and rely on frequent deliveries via independent trucking firms. Our organization works with food manufacturers that produce specialty goods and distribute them daily to Chinese restaurants across the city, as well as cold storage distributors that supply deli meats and prepared foods to neighborhood grocery stores and bodegas—businesses that rely on constant, time-sensitive deliveries to survive. These businesses provide accessible, stable jobs with much better salaries and benefits than local service industry jobs.

At the same time, industrial sectors like food manufacturing and distribution continue to face mounting pressures. Rising rents, land use changes, and regulatory burdens have made it increasingly difficult for these businesses to survive, let alone grow. It is in this context that we raise serious concerns about the Last Mile Licensing rule as currently written.

While we strongly support the City's climate goals, we must point out that this legislation risks unintentionally targeting the very businesses that keep New York fed. Food manufacturers and distributors in North Brooklyn are uniquely vulnerable because:

- **They depend on high-frequency deliveries** of raw ingredients and outbound shipments of perishable goods.
- **They generally do not control trucking fleets**, instead relying on third-party carriers, making compliance with fleet-level emissions mandates impractical.
- **They operate on thin margins**, particularly in wholesale food distribution, where even small cost increases can destabilize operations.

As currently drafted, we believe that the rule casts too wide a net. It would capture not only large e-commerce warehouses as intended, but also **larger industrial buildings housing food producers and distributors**, many of whom have no operational control over transportation emissions. This mismatch between regulatory responsibility and operational control creates an unworkable



EVERGREEN

Your North Brooklyn Business Exchange

compliance burden for these businesses. Moreover, the legislation forbids warehouse operators from contracting with third party delivery companies, completely disrupting the standard operating delivery procedure of most of our production and distribution businesses.

We are also concerned about the cumulative impact of overlapping regulations. Many of these same businesses are already navigating compliance with Local Law 97 and other city, state and federal requirements. Without a coordinated approach, we risk placing unsustainable pressure on small and mid-sized industrial firms.

We are concerned that the high costs of NYC combined with ever escalating compliance burdens will drive businesses outside of New York City, taking their high quality jobs with them. When a food distributor leaves North Brooklyn for New Jersey or Long Island, NYC deliveries do not disappear—they simply travel farther. What was once a short, efficient trip becomes a 10- or 20-mile journey back into the city. This increases congestion, raises costs for consumers, and ultimately **undermines the very emissions reductions the policy is designed to achieve.**

New York cannot afford to become a city that only consumes. We must remain a city that produces, processes, and distributes essential goods—especially food.

We urge the Council to consider the following:

1. **Refine the scope of the rule** to ensure it targets actors with actual control over freight emissions, rather than local manufacturers and distributors.
2. **Provide clear, funded pathways for compliance**, including expanded incentives for cleaner vehicles and equipment that are accessible to small and mid-sized businesses.
3. **Align industrial policy with climate goals**, recognizing that retaining local production and distribution capacity is itself an emissions-reduction strategy.
4. **Invest in alternative freight infrastructure**, including waterways and blue highway systems, to reduce truck dependency over the long term.

Evergreen's work over the past several years has shown that when businesses are supported—not penalized—they can adapt and contribute meaningfully to a greener economy. The decisions made here will determine whether industrial neighborhoods like North Brooklyn remain vibrant centers of production and distribution—or continue to lose the very businesses that sustain our economy and communities and provide nourishment to us all. We ask that you consider these unintended consequences and develop environmental policy that strengthens, rather than displaces, this essential sector.

Written Testimony in Opposition to the Delivery Protection Act New York City Council Hearing

To Council Member Harvey Epstein, Chair of the Committee on Consumer and Worker Protection and Members of the Committee,

My name is Julie Wolf, and I am the owner and founder of Fairly Nuts, a small trail mix business based on the Upper West Side of Manhattan.

I started Fairly Nuts in 2023 because I wanted to create something simple: healthy, convenient snacks for people with busy lives. As a lifelong runner and former Division I track athlete, I've always needed quick, nutritious food to keep up with my day. That's really where the idea came from. I wanted to build a product that fits into the kind of fast-paced lifestyle so many New Yorkers live every day.

Like a lot of small businesses, we don't have a big team or endless resources. We make our products, package them, and sell them however we can, including through retail partners, wholesale, on our website, and through third-party delivery platforms that stock, sell, and help deliver our products to customers. We've been able to grow by being scrappy and finding ways to meet customers where they are. Intro 518-2026 threatens our ability to do that.

Intro 518-2026, regulates what it calls "last-mile facilities," including some of the small facilities (essentially bodegas or convenience stores) that we partner with to stock our goods and package them for delivery. These partnerships are essential for us to get our snacks into our customers' hands, especially because we don't have our own storefronts. In other words, being able to reach customers through grocery delivery apps isn't just an added bonus, it's a core part of how we make money and stay in business. These apps also help people discover our product, which is huge for a small brand like ours trying to grow.

Which is why as a small business owner, I am deeply worried that Intro 518-2026 could make it much harder, or even impossible, for our partners to continue operating these facilities. The costs and requirements being proposed are significant, and if those facilities shut down because they no longer make sense for the apps to operate, businesses like mine are the ones that will feel it first – and hardest. For Fairly Nuts, losing access to these facilities means losing access to the delivery channels that get our snacks to customers. That means lost revenue and an uncertain future.

I understand that the Council is trying to address important issues related to warehouse and delivery workers, and I respect that. But I urge the Council to think about the full, unintended impacts this bill could have on small businesses. I know I'm not the only small business owner in this position. There are a lot of us who depend on these services to reach customers and keep our doors open.

I would urge the Council to take a closer look at how this bill could impact small businesses like mine before moving forward.

Sincerely,
Julie Wolf
Owner & Founder, Fairly Nuts
Upper West Side, Manhattan

Good morning, Council Members,

My name is Roman Dekhterman. I own Falcons Deliveries, a last-mile delivery company in Staten Island. We employ nearly 100 New Yorkers, and every day we operate in some of the toughest delivery conditions in the country.

I'm here because I'm strongly against this bill.

I want to be clear — this is not just another regulation for us. This is a direct threat to my business.

I came to this country from the former Soviet Union. My family came here for opportunity — to build something of our own, to work hard, and to succeed without excessive government control over how we operate.

That's exactly what I've done. I built this company from the ground up. I hire locally, I train my team, I hold them accountable, and I take safety seriously. This business supports nearly 100 people and their families.

What concerns me is that this bill feels like a step in the opposite direction.

It takes a model that works — small business owners creating jobs and running their own operations — and replaces it with a system that removes flexibility, adds heavy oversight, and makes it extremely difficult for independent operators like myself to continue.

And the reality is — delivering in Brooklyn is not easy. There's no parking, buildings are complex, access is difficult, and safety challenges are real. We deal with that every single day. We don't need more layers that make it harder to operate — we need partnership and understanding.

I'm all for safety and accountability. That's how I run my business today. But this bill assumes small operators are the problem, when in reality, we are the ones doing the work and keeping this system running.

If this passes, it won't improve delivery — it will increase costs, reduce efficiency, and push small businesses like mine out.

I came to this country for opportunity — not to see it limited by policies like this.

I ask that you reconsider this approach and work with business owners like myself to find real solutions.

Thank you for your time.

My name is Christine Chan. I own and operate Highgate Logistics, a Delivery Service Partner based in Harlem. I employ approximately 165 New Yorkers.

I'm from Queens. I started in local logistics over twenty years ago, at twenty-six, as a gay woman who didn't fit into large corporate environments.. I went from operations manager to building a company that now employs 165 people. That story exists because this industry lets it exist.

This industry has always been a lifeline for people with non-traditional backgrounds — people returning from incarceration, single parents who need flexible and consistent work, and gay kids from Queens who didn't fit the expected path. We are not a footnote in New York's economy. We are its invisible infrastructure.

Just a few years ago, companies like mine were deemed essential. We kept this city functioning during its most vulnerable moment. Now this bill effectively outlaws locally owned delivery companies by forcing large companies to directly employ drivers.

I support worker safety and community safety without hesitation. But I want to make sure this Council understands what is actually on the table. Large companies faced with these requirements may relocate operations right outside city limits. And the jobs move to New Jersey and Westchester. New York City loses the tax base, loses the local employment, and loses the small businesses that built this work in the first place.

If this bill passes, 165 New Yorkers at my company alone are at risk. Not eventually. Not theoretically. That is what is on the table today.

April 9, 2025

Kurv Industrial to The Committee on Consumer and Worker Protection Regarding Intro 518

Kurv Industrial, formerly Bridge Industrial, is a private, vertically integrated industrial real estate investment and operating firm. We are an active and committed participant in New York City's logistics and industrial market, where we have developed three state-of-the-art facilities totaling over 500,000 square feet and purchased and operate an industrial property exceeding 130,000 square feet. Building on this foundation, we are constructing a new facility of more than 500,000 square feet. We prioritize modern design, sustainability, and operational excellence across our portfolio. Through this active pipeline of development and ownership, we continue to deepen our presence and demonstrate our long-term commitment to the New York City market.

We appreciate the opportunity to provide comments today on [Intro 518 \(Caban\)](#).

Last-mile facilities directly support New Yorkers' daily needs and generate considerable economic benefits for the City, including building investment, property tax generation, and job creation. A modern, well-located distribution network must also support the growing demand for e-commerce.

The development of last-mile facilities has led to brownfield cleanup, energy-efficiency investments, improved truck queuing that is less disruptive to surrounding neighborhoods, and stormwater management that would not otherwise occur. In New York City, we have directly contributed to these outcomes, including the full remediation of a brownfield site in Brooklyn where we developed a 200,000+ square foot Class A facility now fully leased under a long-term agreement. In addition, all our new developments are LEED-certified, reflecting our commitment to energy efficiency and sustainable development practices. These efforts underscore the role responsible developers play in delivering modern logistics infrastructure while improving environmental conditions in the communities we serve.

Intro 518 overlooks the fundamental structure of the last-mile industry and would produce a chilling effect on the logistics ecosystem, discouraging future last-mile investment in New York City. The bill's licensing and employment mandates would introduce significant risk, fixed costs, and ongoing operational burdens for last-mile facilities. Faced with increased regulatory uncertainty and higher costs, owners and operators may choose to relocate to nearby markets, such as New Jersey or Long Island. As a result, developers and property owners like us will delay or scale back investment, including critical modernization projects needed to support an efficient and resilient delivery network.

Fewer last-mile facilities in the City would not reduce delivery demand. Instead, it would lead to longer delivery routes, the use of larger trucks, and [increased congestion on key corridors, including the BQE, crossings, and local streets](#). Siting last-mile facilities close to the end consumer supports the use of electric vehicles (EVs) by enabling shorter routes and more efficient, dense deliveries. Pushing these facilities outside the city would likely force operators to revert to gas-powered fleets, undermining progress toward climate goals.

Facility relocation would also result in a loss of critical tax revenue for New York City. According to a [study executed by HR&A and AKRF](#), the properties developed as last-mile facilities over the past decade

generate \$8.4 million more in annual property tax revenue for the City than they would if they had not been redeveloped, roughly tripling their tax contributions. Losing these facilities undermines a key and growing revenue source for essential City services.

Kurv Industrial supports alternative initiatives to advance a modern, sustainable logistics ecosystem. As highlighted in the [NYC Industrial Plan](#), these include activating Blue Highways to move freight by waterways, expanding micro-distribution models to reduce large truck traffic, and accelerating the shift to EV fleets.

New York City's last-mile delivery network is a critical engine of its economy and daily life. Intro 518 would destabilize this system, resulting in higher costs, more congestion, and fewer opportunities for New Yorkers. We urge the City Council to collaborate with stakeholders in developing alternative solutions that maintain investment, support jobs, and advance a growing and efficient logistics ecosystem for the benefit of all New Yorkers.

Thank you for considering these points.

CONTACT:

Andrew Hurwitz
Partner, East Region
Kurv Industrial
ahurwitz@kurvindustrial.com



April 9, 2026

Re: Intro 518 and the Future of Last-Mile Delivery in New York City

Dear Chair Epstein and Members of the Committee on Consumer and Worker Protection,

We submit this testimony on behalf of New York Delivers – a coalition of workers, small businesses, and community partners across New York City’s last-mile delivery system.

OVERVIEW

The last-mile package delivery system is essential infrastructure for NYC. Every day, roughly 2.5 million packages move through our city – delivering groceries, medicine, and everyday goods to New Yorkers in every borough.

Behind that is a network of local jobs, a platform for small business ownership, and a system deeply embedded in communities across the five boroughs. It provides accessible work, real career pathways, and opportunities for New Yorkers to build something of their own.

We recognize and share the Council’s goal of improving safety and accountability in this growing industry. Operators are already investing in driver training, route oversight, and vehicle standards every day to keep workers and communities safe. But Intro 518, as written, would significantly disrupt how this system operates — and the consequences would fall hardest on the workers and small businesses it claims to protect.

A well-functioning last-mile network keeps costs down, ensures timely delivery, supports local jobs, and reduces congestion and emissions by enabling shorter, more efficient routes across all five boroughs. Intro 0518-2026 puts that entire ecosystem at risk.

LAST-MILE CREATES OPPORTUNITY FOR NEW YORKERS

Last-mile delivery runs on a network of subcontracted delivery companies — businesses of all kinds, rooted in the neighborhoods they serve, including many family-owned operations started by New Yorkers who saw an opportunity and built something from the ground up. This system is standard and has been the norm for years. These companies create stable jobs, invest in their neighborhoods, and provide real pathways to advancement and entrepreneurship. Workers move from driver roles into dispatch, training, and management. Many go further — launching their own businesses, hiring from their own communities, and creating opportunities for the next generation of drivers.

We have seen this firsthand. One driver who came here from Haiti saved enough to buy his own car, then secure his own apartment. Another, originally from Venezuela, worked hard through peak season and took a real vacation for the first time in years. And one small business owner



— a Marine Corps veteran — returned home and built a delivery company that now employs over 100 workers across multiple boroughs, handling tens of thousands of deliveries each week. Through that same network, his company has helped deliver more than 140,000 meals to veterans and families in need. These businesses are woven into the communities they serve.

THIS BILL DOES NOT REFORM THE INDUSTRY – IT DISMANTLES IT.

Intro 518 would put this entire ecosystem at risk.

The bill would require last-mile facilities to obtain discretionary two-year licenses. It would also mandate that all workers be directly employed by facility operators, effectively banning subcontractors, staffing agencies, and third-party delivery companies. Independent analysis indicates many last mile facilities would not be able to meet these requirements – they would not restructure, they would instead shut down or leave the city, effectively shutting down the delivery small business industry in New York City.

This is not reform – it is the dismantling of a system that supports thousands of New Yorkers.

DISMANTLING THE INDUSTRY WILL CAUSE SEVERE IMPACTS:

NEW YORK CITY WILL LOSE MORE THAN 10,000 JOBS

If facilities close down or relocate outside New York to remain viable, the jobs are leaving the city. Independent analysis from AKRF, an independent economic and transportation consulting firm retained to evaluate potential impacts under realistic industry response scenarios, shows hundreds of small businesses and more than 10,000 New York City jobs could be lost. These jobs are concentrated in outer-borough neighborhoods and disadvantaged communities.

From one bill more than 10,000 jobs could be lost – to put that number in context, in all of 2025 the city lost a net 20,000 jobs. New York City cannot afford these hits to its already fragile economy.

DRIVERS WILL HAVE LESS CHOICE AND OPPORTUNITY

The mandate to eliminate contract work does not reflect how this industry actually functions — or what workers value about it. Today, New York City's last-mile delivery drivers can choose to work for a large corporation or for one of the hundreds of small, locally owned businesses operating in their communities. Thousands choose small businesses because they are better at and have a greater incentive to accommodate individual and local employee needs. A mother of four can structure her schedule around her family. A worker can pick up extra weekend shifts to cover bills. Someone re-entering the workforce can find a path that doesn't require a degree or prior experience. Intro 518 would eliminate that choice entirely, forcing a one-size-fits-all model on workers.



DELIVERY COSTS WILL RISE – IMPACTING 78% OF NEW YORKERS EVERY WEEK

The vast majority (78%) of New Yorkers make at least one online purchase every week. Deliveries include everything from groceries to diapers to pet food – New Yorkers feel the week-to-week costs on each of these items.

Analysis by AKRF shows if the bill forces last-mile facilities to relocate out of the city, in order for the package delivery system to maintain the same level of reliability New Yorkers get today, the average New Yorker could pay \$664 more each year on deliveries. This is an unacceptable consequence for New Yorkers.

NEW YORKERS WILL SEE INCREASED CONGESTION AND EMISSIONS

Pushing facilities outside the city means longer routes, bigger trucks, and more vehicles on the road. In fact, analysis shows this could add 38 million additional vehicle miles annually just to maintain current service. That translates to significantly higher emissions – and more traffic across New York City, especially along major corridors in disadvantaged communities.

This does not reduce congestion or pollution – it shifts and increases it.

CONCLUSION

This bill is poorly written, and as a result has severe consequences:

- More than 10,000 jobs at-risk
- Driver choice eliminated
- Hundreds of small businesses shut down
- Increased costs for New Yorkers
- Increased congestion and emissions across the city.

We urge the City Council to vote against Intro 0518-2026.



New York News Publishers Association, Inc.

252 Hudson Ave, Albany, New York 12210 – Phone/Fax (518) 449-1667 – www.nynpa.com

Testimony of the New York News Publishers Association Int. No. 518 Licensing of delivery services to NYC residents

Albany—*Times Union*
Auburn—*The Citizen*
Batavia—*The Daily News*
Brooklyn—*Brooklyn Daily Eagle*
Binghamton—*Press & Sun-Bulletin*
Buffalo—*The Buffalo News*
Canandaigua—*The Daily Messenger*
Cold Spring—*Highlands Current*
Dunkirk—*The Observer*
Elmira—*Star-Gazette*
Geneva—*Finger Lakes Times*
Glens Falls—*The Post-Star*
Herkimer—*The Times Telegram*
Hornell—*The Evening Tribune*
Ithaca—*The Ithaca Journal*
Jamestown—*The Post-Journal*
Kingston—*Daily Freeman*
Lockport—*Union-Sun & Journal*
Long Island—*Newsday*
Malone—*The Malone Telegram*
Massena—*Courier-Observer/The Advance News*
Mendon—*Mendon-Honeye Falls-Lima Sentinel*
Middletown—*The Times Herald-Record*
New York City—*The New York Post*
New York City—*The New York Times*
New York City—*The Wall Street Journal*
Niagara Falls—*Niagara Gazette*
Norwich—*The Evening Sun*
Olean—*The Times Herald*
Oneida—*Oneida Daily Dispatch*
Oswego—*The Palladium Times*
Plattsburgh—*Press-Republican*
Poughkeepsie—*Poughkeepsie Journal*
Ravena—*Ravena News-Herald*
Red Hook—*The Daily Catch*
Rochester—*Democrat and Chronicle*
Rochester—*The Daily Record*
Rochester—*Rochester Business Journal*
Salamanca—*Salamanca Press*
Saranac Lake—*Adirondack Daily Enterprise*
Saratoga Springs—*The Saratogian*
Staten Island—*Staten Island Advance*
Syracuse—*The Post-Standard*
Troy—*The Record*
Utica—*Observer-Dispatch*
Watertown—*Watertown Daily Times*
Wellsville—*Wellsville Daily Reporter*
White Plains—*The Journal News*

We are pleased to submit this testimony on behalf of the publishers of newspapers delivered to subscribers throughout New York City, and we appreciate the opportunity to share our perspective.

We are concerned that Int. No. 518, as currently drafted, could have a significant unintended impact on newspaper delivery operations as they exist today. Specifically, we are worried it could create serious operational challenges and, importantly, would conflict with existing New York State law. Delivery persons are specifically recognized as independent contractors pursuant to enactment of Chapter 503 of the Laws of 2016 of New York State¹ and should be granted an exemption from this legislation.

We want to share some important context about the newspaper industry today. The financial health of many newspapers has faced real challenges in recent years, driven by the shift of advertisers and readers to digital platforms, as well as a significant rise in paper costs - including a more than 25% increase due to the decline of Canadian newsprint production, with prices doubling in some markets. A 2017 tariff on newsprint imposed during the first Trump Administration resulted in significant price increases and loss of mill capacity, and while it was ultimately struck down by the International Trade Commission, prices have only increased as supply has declined.

Nearly 40% of New York's newspapers have closed since 2014; an average of two newspapers close in the United States every week.

Newspaper delivery has long been recognized as a unique and essential service. It takes place within a narrow early-morning window and relies on a dedicated network of independent drivers working limited hours to ensure that readers receive timely news. This longstanding system has served both workers and communities well, and we would hate to see it disrupted.

Additionally, many newspapers rely heavily on advertising in their print editions for vital revenue. The ability to distribute a printed newspaper affordably is key to the survival of many of New York City's local newspapers.

We genuinely believe that enacting this bill without a specific exemption for newspapers would place an undue financial and operational burden on publishers and, ultimately, on the New York City subscribers they serve.

For all these reasons, we respectfully and sincerely urge the New York City Council to include an exemption for newspapers. We would welcome the opportunity to discuss this further and work collaboratively toward a solution that works for everyone.

¹This chapter codifies newspaper delivery individuals are independent contractors due to the unique and historic nature of newspapers.

April 9, 2026

NYC Industrial Advisors, LLC to The Committee on Consumer and Worker Protection Regarding Intro 518

Testimony of NYC Industrial Advisors, LLC

Good afternoon Chair and members of the Committee,

My name is Dan Morici, and I'm here on behalf of NYC Industrial Advisors ([NYCIA: Your Industrial Real Estate Advisor in NYC](#)) We are a small, 10-person real estate brokerage based in New York City, focused on industrial properties. We represent small business tenants and local property owners across the five boroughs.

Despite our size, we've been involved in over \$200 million in transactions, and the majority of our work is with small businesses—contractors, wholesalers, distributors, and third-party logistics operators.

I want to speak today about the real-world impact that Intro 518 would have on those businesses.

While the intent of this legislation may be to regulate large e-commerce operators, in practice, it will fall hardest on small and mid-sized companies. These are businesses that do not have compliance departments or legal teams. They are operating on tight margins, and additional licensing requirements, operational restrictions, and potential penalties will be difficult for them to absorb.

New York City already has a severe shortage of industrial space. It is one of the most supply-constrained sectors in the city. Adding another layer of regulation does not occur in a vacuum—it directly affects whether businesses choose to operate here at all.

We are already seeing tenants struggle to find viable space. If you make it harder and more expensive to operate last-mile facilities, you will not eliminate the need for these uses—you will simply push them outside of New York City.

And when that happens, the consequences are significant. Trucks will travel longer distances into the city. Costs will increase. Service becomes less efficient. And ultimately, those costs are passed on to consumers and small businesses that rely on these supply chains.

It's also important to understand that last-mile facilities are not just large e-commerce warehouses. They include the infrastructure that supports everyday life in New York—food distribution companies like Farm to People, bike-share systems like Citi Bike, local wholesalers, and construction suppliers. These are essential operations.

Intro 518 risks disrupting that ecosystem.

We respectfully urge the Committee to consider the unintended consequences of this legislation—particularly its impact on small businesses and the already fragile industrial market in New York City.

Thank you for your time.

NYC Bill Intro 518-2026

April 9, 2026

Honorable Members of the City Council:

I am Kevin Daly, Chief Operating Officer For PCF, Inc., a newspaper distribution company that delivers 15+ English language newspapers and 25+ foreign or ethnic publications within New York City.

We also partner with Mitchell's Newspaper Delivery Service, a similar delivery service in parts of New York City, primarily Manhattan, who handle an additional 15 English language newspapers along with numerous financial and foreign publications and magazines

Between us we contract with more than 600 individuals/small owner-operators who are contracted to make deliveries servicing the entire NYC community along with local Jewish, Asian, Greek, Spanish and other ethnic communities.

- Our contractors deliver to more than 100,000 homes each day of the week
- Together we employ in excess of 100 part-time and full-time employees within NYC
- Mitchell's has been operating in the boroughs for the past 80 years, PCF for 35 years
- We have continued the newspaper delivery model that has operated throughout the industry for well over 100 years, utilizing independent contractors to perform home delivery for our newspaper clients and in 2016*, the state of New York recognized the model and passed legislation exempting the industry from being required to utilize employees in the delivery of newspapers.
- Our contractors choose to deliver newspapers as it compliments their other business activities or jobs. For example, Landscapers, Tradesman, Teachers, Postal workers, Moms & Dads as well as other delivery personnel who enjoy the convenience of early morning hours and the ability to perform their contracted work without any supervision or control by my company.
- Contractors typically perform these duties for just a few hours each day to earn extra income before going on to their other businesses or jobs.

What happens if this bill gets passed?

- We would have to more than double our cost to NYC newspaper Publishers that we serve, making it financially impossible for them to continue

providing a printed newspaper to NYC residents and a more likely scenario is that

- We would have to exit the NYC market with nearly 700 NYC citizens losing their current supplemental income
- Based upon Publisher feedback
 - NYC newspapers would be forced into significant layoffs or
 - Some NYC newspapers would stop printing and delivering newspapers similar to what occurred in NJ with the Star Ledger, Trenton Times and Jersey Journal which resulted in significant job losses.
 - This would severely impact well-paying part-time, full-time, union, and non-union workers across the boroughs.
- Additionally, many NYC minority communities would become a news desert and
- NYC Senior citizens, especially those in long-term care or assisted living facilities, dependent on a printed newspaper would lose their access to news and their daily connection to the outside world.

If this bill gets passed it will be a catastrophic event for the newspaper industry

In closing:

- This is a plea to you to save an already challenged industry so that it can continue to bring the news to the diverse citizens of NYC as it has for over 100 years.
- Please review the State legislation and modify this bill to be consistent with the state exemption for the newspaper industry.

Thank you for your time and consideration.

****Chapter 503 of the Laws of 2016, under New York State law***

I am writing to express my strong opposition to the proposed legislation, Intro 518, as a small business owner and Delivery Service Partner (DSP). I currently operate a business that employs approximately 150 delivery associates, along with office and support staff. If Intro 518 is enacted, I will be forced to shut down my operation entirely.

The consequences of this legislation are not abstract—they are immediate and severe. Closing my business would result in the loss of over 150 jobs, leaving hardworking individuals unemployed and dependent on government assistance. These are not just numbers; they are people with families, responsibilities, and livelihoods at stake.

My company has always prided itself on fostering a supportive, family-like work environment. Many of our drivers come from backgrounds where opportunities in large corporate environments are limited due to lack of formal education or traditional qualifications. We provide these individuals with stable employment, fair treatment, and opportunities to succeed. We recognize and reward our drivers weekly for safety performance and quality of work, creating a culture of accountability, motivation, and respect.

Intro 518 threatens to dismantle not only my business but also the broader ecosystem of opportunity that small businesses like mine create. It undermines the very foundation of the American Dream—the ability for individuals to build something of their own, create jobs, and contribute meaningfully to their communities.

Beyond employment, we actively give back to our local community. We support nearby schools through donations of supplies and partner with local employment offices to provide job opportunities for residents. Our business is not just an employer; it is a community partner.

In its current form, Intro 518 would eliminate these contributions and replace them with uncertainty and economic hardship. I urge policymakers to carefully consider the real-world impact of this legislation on small business owners, employees, and communities.

I respectfully ask that you oppose Intro 518 or work toward revisions that protect small businesses and the people who depend on them.

Thank you for your time and consideration.

Regina Nisimov
Owner of Proactive Logistics Home Inc.
proactivelogisticshome@gmail.com

April 8, 2026

New York City Council
Committee on Consumer and Worker Protection
City Hall Pk Path
New York, NY 10007

Submitted via Online Portal

Re: Int. 0518-2026

Dear Chair Epstein and Members of the Consumer and Worker Protection Committee,

Prologis appreciates the opportunity to submit testimony regarding Introduction 518, which would establish a licensing framework and operational requirements for last-mile facilities in New York City. Prologis is a global logistics real estate company that owns and develops industrial facilities across New York City, with approximately 1.2 million square feet of logistics space in our portfolio. Our facilities support the movement of goods that New Yorkers rely on every day, including food, medical supplies, consumer products, and inventory for small businesses. The tenants who occupy these buildings operate the logistics networks that enable efficient and reliable delivery throughout the city.

We share the Council's interest in ensuring efficient operations and safe delivery practices. However, we are concerned that Int. 518, as drafted, could produce several unintended consequences for commerce, investment, and the movement of goods within New York City.

Potential chilling effect on commerce and economic activity

New York City already presents a uniquely challenging operating environment for logistics activity due to limited industrial land, aging infrastructure, and high operating costs. Introducing an additional licensing regime combined with new compliance and operational requirements may create a chilling effect on commerce in the city's logistics market.

When companies evaluate where to locate or maintain facilities, they compare regulatory environments across the broader region. If operating in New York City becomes significantly more uncertain or costly, logistics activity may shift to facilities outside the five boroughs.

When that occurs, demand for goods in New York City does not decline. Instead, supply chains move farther away from the point of delivery. This dynamic can increase vehicle miles traveled, add congestion, and raise delivery costs. Over time, it may also shift jobs and associated tax revenue out of the city.

Ultimately, those higher logistics costs are often passed through the supply chain and borne by New York City businesses and consumers.

Risk of discouraging operators from entering or renewing in the NYC market

A key consideration is how measures like Int. 518 affect the decisions of logistics operators themselves.

Prologis is a property owner and developer. We invest in logistics infrastructure, but those investments depend on operators choosing to lease space, enter the market, and renew their presence in New York City.

In recent years, many operators have already been cautious when evaluating expansion or renewal decisions in the city due to high costs, regulatory uncertainty, and operational constraints. Policies that introduce material changes to how facilities are structured and operated may increase that hesitation.

Prologis wants to continue investing in New York City and building on our existing 1.2 million square foot footprint, but that investment ultimately depends on the presence of operators willing to occupy these facilities. If operators begin to exit the market or decline to renew leases, that investment is unlikely to materialize.

Continued partnership with the City on freight and sustainability initiatives

Prologis has sought to be a constructive partner with New York City in advancing policies that improve the movement of goods while supporting broader environmental and infrastructure goals.

For example, we have worked with stakeholders to advance initiatives such as Blue Highways, which seeks to move freight through waterways and reduce truck congestion on city streets. We also support efforts to modernize facilities and enable more sustainable logistics operations. An example of this is our facility at 1867 Flushing Avenue, which hosts an electric vehicle fleet and advanced charging infrastructure to support fleet electrification.

However, the investment needed to scale electric infrastructure across the city remains in its early stages. Continued progress will depend on creating an environment that supports the significant capital investment required to deploy charging infrastructure and enable broader fleet electrification and avoids additional regulatory burdens that could hamper the pace of investment needed to scale this infrastructure citywide.

These efforts reflect a shared goal of improving how goods move through the city while reducing environmental impacts. Continued progress depends on maintaining an environment where logistics operators and property owners are willing to invest and innovate within New York City.

Liability placed on owners who do not operate facilities

Finally, we are concerned that the bill's definition of "facility operator" may capture property owners who do not actually operate logistics facilities or control day-to-day operations.

In most cases, property owners lease buildings to independent companies that manage their own logistics operations and delivery networks. Those operators determine how goods are handled, how deliveries are conducted, and how employees are managed.

However, Int. 518 could impose licensing obligations and potential liability on property owners who do not control these operational activities. This approach risks assigning responsibility to entities that lack the authority to manage or oversee the conduct the legislation seeks to regulate.

If the Council's intent is to regulate operational practices within last-mile logistics networks, we believe it would be more effective to focus regulatory obligations on the entities that directly control those operations.

Conclusion

New York City's logistics infrastructure plays a critical role in supporting commerce, jobs, and the reliable delivery of goods to residents and businesses.

While we support the Council's goals of promoting efficient and safe logistics operations, we are concerned that Int. 518, as drafted, may have unintended consequences, including discouraging operators from maintaining a presence in the city, reducing supply chain efficiency, and shifting economic activity outside the five boroughs, even as demand for goods within the city remains constant.

We respectfully urge the Council to carefully consider the broader impacts of this proposal and work with stakeholders to ensure that logistics activity, jobs, and investment remain in New York City

Prologis appreciates the opportunity to provide these comments and looks forward to continued engagement with the Council on this issue.

Sincerely,

Jeremiah Kane

SVP, Value Added Investments

Prologis



WRITTEN TESTIMONY

Submitted to the New York City Council Committee on Consumer and Worker Protection

Hon. Harvey Epstein, Chair

April 9th, 2026

Regarding: Int. No. 0518-2026 — A Local Law to Amend the Administrative Code of the City of New York, in Relation to Requiring the Licensing of Last-Mile Facilities

Introduction

We thank the members of the Committee for the opportunity to submit written testimony regarding Int. No. 0518. Our names are Daniel Schneider, David Weil, and Kevin Bruey, and we are researchers affiliated with the Shift Project at Harvard University, which produces novel research on service sector labor in the United States. In October of 2025, we published [*Amazon Drives Low Wages: The Unraveling of Workplace Protections for Delivery Drivers*](#), a report that draws on survey data gathered from more than 9,000 workers in delivery or fulfillment center roles at Amazon, UPS, and FedEx around the country. To our knowledge, this is the first and only study to directly and quantitatively compare job quality and economic security across workers in similar roles at these three firms. Consequently, we are able to offer unique insights into the working conditions associated with Amazon’s last-mile delivery operations.

Our research highlights the contrast between two fundamentally different employment models in this sector. UPS directly employs its entire delivery workforce under a union contract with the Teamsters. As the Committee is aware, Amazon, by contrast, delivers through its DSP program—in which drivers are directly employed by nominally independent small companies but nonetheless operate under Amazon's direction and branding—as well as through Amazon Flex, which designates drivers as independent contractors. This “fissured” system allows Amazon to shirk responsibility for worker well-being and for compliance with labor regulations, in addition to greatly complicating unionization efforts.¹

¹ FedEx represents an in-between business model. FedEx operates like a franchised system of delivery, with its drivers classified (by the company) as independent contractors. Yet despite this status, it is a highly integrated

Because of our ability to survey drivers in all three companies, we can measure what this difference means in practice for Amazon workers. Our research reveals the stark differences even within Amazon for those workers who are direct employees of the company (those working in its fulfillment centers) versus the hundreds of thousands of drivers who do not enjoy that employee status.

Key findings

Wages

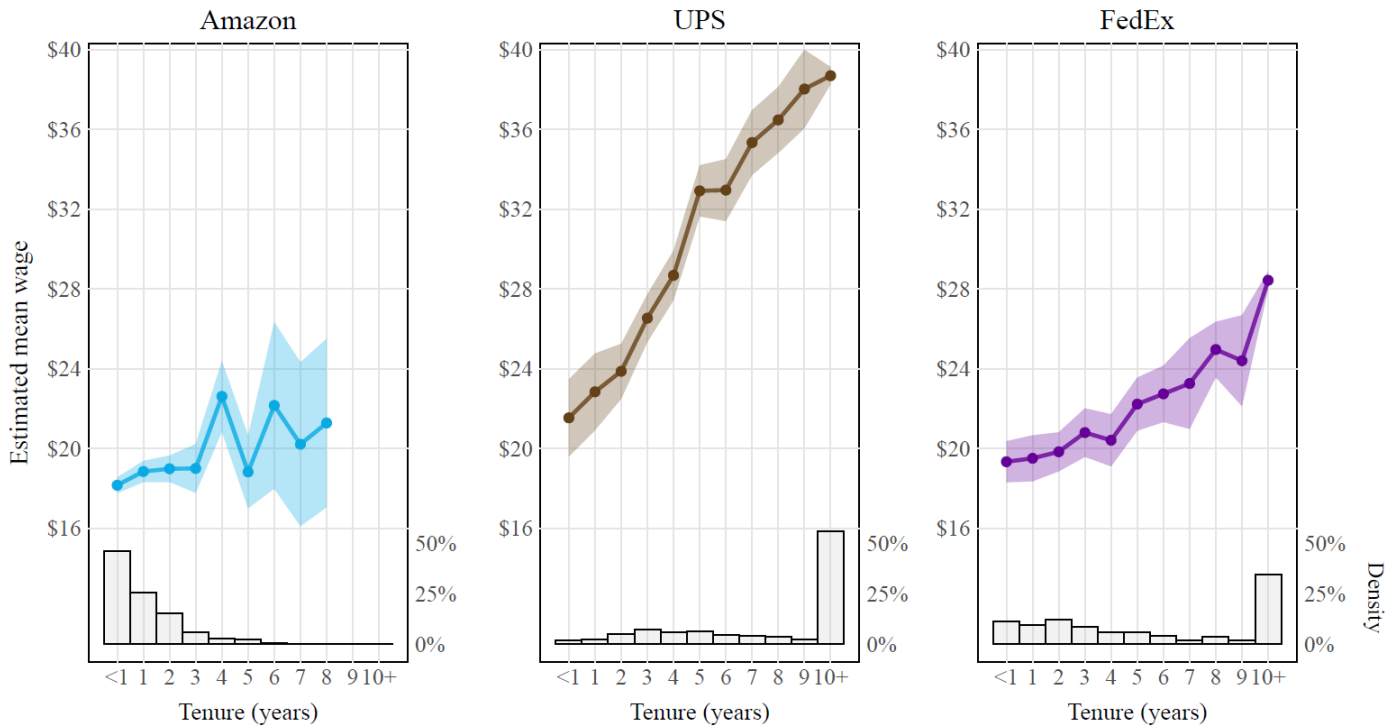
The arms-length relationship between Amazon and its drivers versus the direct employment of drivers at UPS reveals itself in the average wages earned in those companies. Amazon drivers earn \$19/hour on average, compared to \$35/hour for unionized UPS drivers and \$25/hour for FedEx drivers. While average wages for the W2 workers in Amazon's fulfillment centers (\$18/hour) lag slightly behind those at UPS (\$23/hour) and FedEx (\$19/hour) fulfillment centers, the difference is much less pronounced, suggesting that Amazon's delivery drivers may be uniquely disadvantaged by their classification as either an employee of a subcontractor or an independent contractor.

Wage returns to job tenure

The average wage comparisons above disguise what is perhaps the single most striking difference between Amazon on the one hand, and UPS and FedEx on the other. At UPS (and to a lesser extent FedEx), wages rise with job tenure. That is, drivers are rewarded for seniority at UPS while those at Amazon see little change in their wages even after several years with the company. This is depicted in the following figure.

company that depends on sophisticated logistic systems coordinating the delivery, practices, and operating parameters for all of its franchised operators, although providing the franchisees greater discretion in their work than DSP contractors.

Wage Returns to Tenure: Delivery Drivers at Amazon, UPS, & FedEx



UPS drivers start at about \$21/hour. Wages rise steadily from there, reaching \$32/hour with five years of service and nearly doubling over ten years of driving at UPS to close to \$40/hour. There is a similar, albeit less steep, gradient at FedEx. But, for Amazon drivers, there are essentially no wage returns to tenure on the job. Wages start lower, at about \$17/hour, and increase very little over years of tenure driving for Amazon.

A second major difference between the jobs for Amazon drivers versus those who work as employees of UPS is shown in the gray bars at the bottom of the chart, which illustrate the distribution of job tenure at each company—that is, the share of workers who have been there for one year, two years, five years, etc. While just 2% of UPS drivers have been with the firm for less than a year, that share is 46% at Amazon. In contrast, while almost 56% of UPS workers have been at the firm for ten years or more, that share is effectively 0% at Amazon. These differences reveal the relative stability arising from employment at UPS versus the high turnover among drivers at Amazon.

Scheduling, benefits, & material hardship

Amazon fulfillment center workers (most of whom are direct W-2 employees) have relatively stable schedules and robust access to employer-sponsored benefits as compared to their UPS and FedEx counterparts. However, Amazon delivery drivers fare significantly worse in both regards. For example, they are nearly 30 percentage points less likely to have two weeks' advance notice of their work schedule and nearly 30 percentage points less likely to have dental insurance than Amazon fulfillment center workers. As compared to UPS and FedEx drivers or Amazon's own fulfillment center workers, Amazon delivery drivers report significantly higher rates of numerous material hardships, including going hungry in the past month or being unable to fully cover utility bills. The disparities between these workers and Amazon's directly employed fulfillment workers once again suggests that employment classification may be an important contributing factor.

Conclusion

Low and stagnant wages, lack of job stability, unpredictable schedules, a lack of employer-sponsored benefits, and the experience of severe material hardships are not inherent to last-mile delivery work. Instead, we find that these undesirable outcomes are most concentrated among Amazon delivery drivers, who are classified as either employees of subcontracted DSPs or as independent contractors. The contrast between job quality of Amazon's delivery drivers and the job quality of drivers at UPS—as well as the contrast between job quality of Amazon's drivers and that of workers directly employed by Amazon in its fulfillment centers—suggests an association between Amazon's fissured employment model and the substandard working conditions of its drivers. These stark differences are not only significant because of their impact on the wellbeing of Amazon's and UPS's drivers; they also matter because Amazon's growing presence exerts market power that impacts the working conditions of workers beyond its own delivery drivers. As a result, the continuing expansion of the Amazon business model could ripple out to working people more generally.

We greatly appreciate the Committee's consideration of our findings and are available to answer any additional questions.

Daniel Schneider

Malcolm Wiener Professor of Social Policy and Sociology, Harvard University

Co-Founder, The Shift Project

dschneider@hks.harvard.edu

David Weil

Samuel F. and Rose B. Gingold Chair in Social Policy and Professor of Economics

Brandeis University

davweil@brandeis.edu

Kevin Bruey

Predoctoral Research Fellow, The Shift Project

kbruey@hks.harvard.edu

April 9, 2026

Sitex Group to The Committee on Consumer and Worker Protection Regarding Intro 518

[Sitex Group](#) is a real estate firm focused on acquiring, developing, and repositioning industrial assets in New York City. We appreciate the opportunity to provide comments today on [Intro 518 \(Caban\)](#).

We are a small business ourselves, totaling 14 people spanning various different functions of property management, investment, construction and accounting. Despite our small size, we've managed to invest several hundred million dollars in New York City to transform old, rundown buildings into high-quality workspaces for the industrial users that make this city function properly. The vast majority of our tenant base is comprised of small businesses that rely on larger logistics users for their livelihoods.

Logistics within New York City can be characterized as a living, breathing ecosystem. The largest operators, or Fortune 1000 companies, of course drive the industry forward. However, what seems to go unrecognized is that for each Amazon or FedEx, there are countless smaller businesses that support the overall function of the marketplace. These small businesses include third party delivery companies, truck and delivery vehicle rental companies, racking and materials providers, mechanical, electrical and plumbing contractors and engineers that manage, repair, and build last mile facilities, etc.

By pushing large logistics operators out of New York City – the life blood of this delicate ecosystem – the small businesses that rely on and support them will be forced to relocate to wherever the large companies land or, worse, shut down entirely.

Last-mile facilities directly support New Yorkers' daily needs and generate considerable economic benefits for the City, including building investment, property tax generation, and job creation. A modern, well-located distribution network must also support the growing demand for e-commerce.

The development of last-mile facilities has led to brownfield cleanup, energy-efficiency investments, improved truck queuing that is less disruptive to surrounding neighborhoods, and stormwater management that would not otherwise occur. Further, as an example, Amazon utilizes fleets of bicycles for local delivery from their last-mile hubs. This is a perfect example of removing trucks from streets, while lowering congestion and emissions. If Intro 518 passes, that last-mile facility, **without question**, will be relocated outside the city, resulting in a return to delivery methods of old: larger trucks doing more and more trip, double parking, causing congestion and increased emissions.

Intro 518 overlooks the fundamental structure of the last-mile industry and would produce a chilling effect on the logistics ecosystem, discouraging future last-mile investment in New York City. The bill's licensing and employment mandates would introduce significant risk, fixed costs, and ongoing operational burdens for last-mile facilities. Faced with increased regulatory uncertainty and higher costs, facilities will choose to relocate to nearby markets, such as New Jersey or Long Island. As a result, property owners and developers will cancel or scale back investment, including critical modernization projects needed to support an efficient and resilient delivery network.

Fewer last-mile facilities in the City will not reduce delivery demand, **but it will** lead to longer delivery routes, the use of larger trucks, and [increased congestion on key corridors, including the BQE, crossings, and local streets](#). Siting last-mile facilities close to the end consumer supports the use of electric vehicles (EVs) by enabling shorter routes and more efficient, dense deliveries. Pushing these facilities outside the city would likely force operators to revert to gas-powered fleets, undermining progress toward climate goals.

Facility relocation would also result in a loss of critical tax revenue for New York City. According to a [study executed by HR&A and AKRF](#), the properties developed as last-mile facilities over the past decade generate \$8.4 million more in annual property tax revenue for the City than they would if they had not been redeveloped, **roughly tripling their tax contributions**. Losing these facilities undermines a key and growing revenue source for essential City services.

Sitex Group strongly supports alternative initiatives to advance a modern, sustainable logistics ecosystem. As highlighted in the [NYC Industrial Plan](#), these include activating Blue Highways to move freight by waterways, expanding micro-distribution models to reduce large truck traffic, and, with meaningful, productive collaboration from utility companies, accelerating the shift to EV fleets.

New York City's last-mile and logistics delivery ecosystem is a delicate and critical engine of its economy and daily life. Intro 518 would destabilize this system, resulting in higher costs, more congestion, and fewer opportunities for New Yorkers – **and a collapse of the underlying small businesses that support the largest operators of these facilities**. We urge the City Council to collaborate with stakeholders in developing alternative solutions that maintain investment, support jobs, and advance a growing and efficient logistics ecosystem for the benefit of all New Yorkers.

Thank you for considering these points.

CONTACT:

Zach McHugh

Owner

Sitex Group

Zachkmchugh@gmail.com



Testimony of Joan Moriarty, Director of Research and Campaigns at the Strategic Organizing Center

**Committee on Consumer and Worker Protection
NYC Council**

April 9, 2026

My name is Joan Moriarty, and I have served as the Director of Research and Campaigns at the Strategic Organizing Center (SOC) for the past seven years. The SOC advocates for workers, consumers and other constituencies harmed by concentrated corporate power across a wide range of industries using its cutting-edge research to develop transformational corporate reform campaigns.

Since 2021, the SOC has led the charge in using comprehensive data analysis to support workers' firsthand accounts of dangerous conditions at Amazon's warehouses and delivery network. Over the past five years, we have issued seven reports on the unmitigated health and safety crisis at America's second largest private employer and one of the largest operators of last-mile delivery facilities in New York City.¹

The SOC unequivocally supports the passage of the Delivery Protection Act (Int. 1396-2025). The massive growth in e-commerce, which was rapidly accelerated during the COVID-19 pandemic, has fueled an unbridled expansion of New York City's last-mile delivery and logistics network and, in the absence of effective oversight, imposes substantial harm on both workers and our communities.

While this harm is broadly experienced by New York City residents in the form of traffic and pollution, among other problems, in this testimony I will focus on how workers employed in the last-mile delivery industry in NYC are impacted by that system. First, I will present key

¹ The Guam Daily Post. "The nation's largest employers are putting their workers on notice GRAPHIC." November, 2, 2025. Accessed April 2026, https://www.postguam.com/business/world/the-nation-s-largest-employers-are-putting-their-workers-on-notice-graphic/pdf_62caad03-05fc-4331-b186-00629a907b7e.html New York City Comptroller, "Fast Shipping, Slow Justice: Traffic, Worker, and Climate Hazards in Last-Mile Delivery," November 2025. Accessed April 2026. <https://comptroller.nyc.gov/reports/fast-shipping-slow-justice-traffic-worker-and-climate-hazards-in-last-mile-delivery/>

findings from SOC's most recent analysis of Amazon's injury data, highlighting the company's failure to deliver promised safety improvements. Second, I will highlight select findings from the New York City Comptroller's report issued in November 2025 on how the injury crisis manifests in last-mile delivery facilities in NYC.

Amazon's injury crisis

Since 2021, the SOC has published annual analyses of injury data submitted by Amazon and other warehousing and logistics employers to the federal Occupational Safety and Health Administration (OSHA). OSHA publicizes this data on its website.² We focus on Amazon because it is the second largest private sector employer and employed 39% of all warehouse workers nationally in 2024.³

In New York City, Amazon operates at least 16 warehouses, including the largest in the city, JFK8 located in Staten Island, as of the most recent data.⁴ Amazon employs at least 13,000 workers in its logistics network across the city.⁵ In its last mile portion, Amazon accounted for about 36% of the NYC last mile workforce, including 14% employed directly by Amazon at its last-mile facilities and 22% employed indirectly through Amazon's Delivery Service Partners, or DSPs.⁶

Year after year, SOC's analyses of this injury data in the warehousing and delivery sectors demonstrate Amazon's failure to protect its workers from serious harm.⁷

² Occupational Safety and Health Administration, "Establishment-Specific Injury and Illness Data," accessed April 2026, <https://www.osha.gov/Establishment-Specific-Injury-and-Illness-Data>.

³ This figure is calculated using total hours worked reported in OSHA's 2024 Establishment-Specific Injury and Illness Data. The dataset includes facilities reporting under NAICS code 493110, General Warehousing and Storage.

⁴ In 2024, Amazon reported injury data to OSHA for 16 facilities in New York City. Amazon's JFK8 facility reported an annual average employment of 4,822, the highest among all establishments that reported injury data to OSHA under NAICS codes 492 Couriers and Messengers and 493110 General Warehousing and Storage.

⁵ Employment figures reflect annual average employment reported in OSHA's 2024 Establishment-Specific Injury and Illness Data. These include 8,361 workers directly employed at Amazon's 16 facilities that reported data to OSHA and at least 4,794 workers employed indirectly through DSPs operating in New York City.

⁶ Employment figures are based on establishment-level data from OSHA's 2024 Establishment-Specific Injury and Illness Data for facilities in NAICS code 492, Couriers and Messengers. Percentages are calculated using full-time equivalent employees. In 2024, facilities under this NAICS code reported 15,545 FTEs to OSHA, of which 2,139 (14%) were employed directly by Amazon and 3,469 (22%) were employed indirectly through DSPs. FTEs are calculated from total hours worked reported at each facility, with one FTE defined as 2,000 hours per year.

⁷ Our reports, and details about the sources for the data used in those reports, are available at www.thesoc.org, including *Failure to Deliver* (2025), *Same-Day Injury* (2024), *In Denial* (2023), *The Injury Machine* (2022) and *Primed for Pain* (2021). We have also documented the similar hazards in the company's

In our most recent analysis, we found that Amazon reported 39,062 injuries across its logistics and warehousing network in 2024, amounting to an injury rate of 6.0 cases per 100 full-time equivalent (FTE) employees. Despite the company's persistent claims about committing to worker safety, its 2024 injury rate is only about 10% lower than its 2020 injury rate. This reduction is paltry given that, in 2021, the company announced a goal of reducing its injury rates by half from 2020 levels by 2025. Yet, as of 2024, Amazon's injury rate remained more than 80% higher than that goal.⁸

SOC's analysis has also shown that Amazon's injury rates are much higher than those of its competitors and that injuries experienced by its workers tend to be more severe. In 2024, Amazon's warehouses reported a serious injury rate nearly double that of non-Amazon warehouses, with rates of 5.9 and 3.0 cases per 100 FTEs, respectively. This measure, also referred to as the days away, restricted, or transferred (DART) rate, captures injuries that are serious enough to require time away from work or limit a worker's ability to perform regular duties.

In addition, SOC's analysis of case-level data shows that injury spikes are predictable and closely correlated with peak periods. Injury data from 2023 and 2024 show sharp increases in injuries during the company's major sales events, including Prime Day in July, Prime Big Deal Days in early October, and the extended holiday season beginning in November and peaking the week of Cyber Monday. In 2024, the company recorded 35% more serious injuries during the week of Prime Day than the prior week, 21% more during Prime Big Deal Days than the prior week, and 52% more during the week of Cyber Monday than at the start of the holiday shopping period. These patterns appear consistent across reporting periods and correspond to known increases in customer demand. When high injury periods are predictable, they are preventable, and the OSHA data show that Amazon has failed to take meaningful steps to prevent injuries during peak periods.

Moreover, the injury rates discussed today are more alarming given that they only account for a partial subset of all the worker injuries that take place at the company's warehouses every year. According to a 2024 U.S. Senate investigation, Amazon's internal policies may operate to reduce the number of injuries classified as OSHA-recordable.⁹ Among the evidence cited, the Senate Committee pointed to internal injury logs where the company

delivery operations *The Worst Mile* (2022) as well as Amazon's failure to properly identify and report to OSHA thousands of the COVID cases likely transmitted within its facilities in *Hidden Pandemic* (2021).

⁸ Strategic Organizing Center, "Failure to Deliver: Amazon Falls Short on Safety," May 2025, https://thesoc.org/wp-content/uploads/2025/05/May-2025_Strategic-Organizing-Center_Report-x-Failure-To-Deliver.pdf

⁹ United States Senate Committee on Health, Education, Labor, and Pensions. The "Injury-Productivity Trade-off". December 2024. Pages 117 to 123.

records all injuries, not just those reported to OSHA. In one example at a facility in Texas, the Committee found that the company recorded 476 injuries in its internal log but only reported 31 (7%) of those injuries to OSHA.¹⁰ In its assessment of this data, the Committee concluded that the large discrepancy between the company’s internal injury logs and the injury data reported to OSHA suggests that company had failed to properly classify some of those injuries as OSHA-recordable.

Injuries at Last-Mile Facilities in New York City

In November 2025, the New York City Comptroller released a report on the traffic, environmental, and labor impacts of last-mile delivery facilities in New York City. The report includes an analysis of worker injury rates at these facilities; the SOC contributed our data expertise to the Comptroller’s staff for this section of the report.¹¹

The report’s findings demonstrate that Amazon’s last-mile delivery sector workers face a worker injury crisis consistent with patterns SOC has identified across Amazon’s national logistics network, including elevated injury rates and more severe injuries compared to the rest of the relevant industry.¹² The Comptroller’s report also highlights Amazon’s subcontracting model, which allows Amazon to retain near-total operational control of its technically third-party delivery service partners (DSPs), while evading accountability and complicating enforcement of labor standards and protections for those delivery workers. While Amazon maintains that DSP drivers are not its employees, their day-to-day work reflects a different reality. DSP drivers operate Amazon-branded vehicles, wear Amazon uniforms, and deliver Amazon packages exclusively on routes that Amazon plans and manages. Amazon defines the instructions and performance requirements that are communicated directly to drivers through an Amazon app.¹³ In 2022, SOC analyzed injury data reported to OSHA by Amazon DSPs in 2021 and found an injury rate of 18.3 injuries per

¹⁰ United States Senate Committee on Health, Education, Labor, and Pensions. The “Injury-Productivity Trade-off”. December 2024. Pages 123.

¹¹ New York City Comptroller, “Fast Shipping, Slow Justice: Traffic, Worker, and Climate Hazards in Last-Mile Delivery,” November 2025. Accessed April 2026. <https://comptroller.nyc.gov/reports/fast-shipping-slow-justice-traffic-worker-and-climate-hazards-in-last-mile-delivery/>

¹² Figure 3. New York City Comptroller, “Fast Shipping, Slow Justice: Traffic, Worker, and Climate Hazards in Last-Mile Delivery,” November 2025. Accessed April 2026. <https://comptroller.nyc.gov/reports/fast-shipping-slow-justice-traffic-worker-and-climate-hazards-in-last-mile-delivery/>

¹³ National Employment Labor Project. “As a Delivery Worker Union Campaign Takes Off, Amazon Tries to Dodge Labor Law.” November 22, 2024. Accessed April 2026, <https://www.nelp.org/as-a-delivery-worker-union-campaign-takes-off-amazon-tries-to-dodge-labor-law/>

100 FTEs. This rate was about 68% higher than at the company’s delivery stations and more than double than at its sortation centers.¹⁴

As detailed in the Comptroller’s report, e-commerce and delivery activity in New York City has increased significantly in recent years, with daily package deliveries rising from approximately 1.1 million in 2017 to 2.5 million in 2024. Today, roughly one-third of New Yorkers receive a package on any given day. To meet this explosive demand, companies such as Amazon and FedEx have developed extensive networks of last-mile distribution facilities across all five boroughs. The expansion of these facilities has been accompanied by significant growth in employment. One estimate of the broader e-commerce industry found that approximately 45,400 workers were employed in New York City in 2024, an 84% increase since 2014.¹⁵

As the last-mile delivery sector has grown, so have its workplace injuries. OSHA regulation requires employers with at least 20 employees in certain high-risk industries, including transportation and warehousing, to report injury data annually.¹⁶ Between 2022 and 2024, 38 of the 50 last-mile facilities identified by the New York City Department of City Planning, or 76%, reported injuries to OSHA in at least one of those years. Across those facilities, workers experienced more than 2,000 workplace injuries in the three-year period, averaging 678 injuries per year. The total recordable injury rate over the three-year period was 8.3 per 100 FTEs, more than three times the national average for all private employers across all industries in 2024 (2.3).¹⁷

Equally concerning is the severity of injuries, as reflected by the rates of serious injuries recorded at these last-mile facilities. More than 8 in 10 (85%) reported injuries resulted in

¹⁴ In 2021, DSPs had a total injury rate of 18.3 per 100 FTEs, compared to 10.9 for Amazon delivery stations and 5.6 for sortation Centers. Strategic Organizing Center, “The Worst Mile: Production Pressure and the Injury Crisis in Amazon’s Delivery System.” May 2022. <https://thesoc.org/wp-content/uploads/sites/342/The-Worst-Mile-1.pdf>

¹⁵ New York City Comptroller, “Fast Shipping, Slow Justice: Traffic, Worker, and Climate Hazards in Last-Mile Delivery,” November 2025. Accessed April 2026. <https://comptroller.nyc.gov/reports/fast-shipping-slow-justice-traffic-worker-and-climate-hazards-in-last-mile-delivery/>

¹⁶ Occupational Safety and Health Administration, “Improve Tracking of Workplace Injuries and Illnesses,” accessed April 6, 2026, <https://www.osha.gov/recordkeeping/final-rule>

¹⁷ The total recordable injury rate (TRIR) of 8.3 is calculated from aggregate injury data for 2022 through 2024. The New York City Comptroller’s report used the 2023 national TRIR as a comparison, which was the most recent figure available at the time of publication. This testimony updates that comparison using the 2024 national TRIR, which the Bureau of Labor Statistics has since published. U.S. Bureau of Labor Statistics. “TABLE 1. Incidence rates(1) of nonfatal occupational injuries and illnesses by industry and case types, 2024.” Accessed April 2026, <https://www.bls.gov/iif/nonfatal-injuries-and-illnesses-tables/table-1-injury-and-illness-rates-by-industry-2024-national.htm>

workers taking time away from work or being placed on light-duty assignments. Across all last-mile facilities in NYC, the serious injury rate over the three-year period was 7.2, nearly five times the national average of private employers across all industries in 2024 (1.4).¹⁸ Further, the median number of days away from work or on restricted duty increased by 15% from 2023 to 2024 – the only two years for which this data is available¹⁹ – from 60 days in 2023 to 69 days in 2024. That means that half of all delivery workers who had a severe injury were completely unable to work or could not perform their usual job tasks for more than two months.

The Comptroller’s report also highlights how Amazon’s DSP model may exacerbate the risks workers face. The report includes an analysis of injuries among Amazon DSPs operating in New York City in 2023 and 2024. According to the report, Amazon’s DSPs reported a recordable injury rate of 9.2 injuries per 100 workers and a DART rate of 8.1. These rates were higher than the injury rates for the other facilities in the last-mile and courier industries operating in New York City. The report identifies this fissured structure as a key regulatory challenge: Amazon retains control over operations while its subcontracting obscures accountability and complicates enforcement of labor standards and worker protections.

Conclusion

SOC’s analyses of worker injuries across Amazon’s national logistics network and the New York City Comptroller’s report on last-mile delivery facilities point to the same conclusion: There is a serious worker injury crisis in the last mile delivery sector rooted in a business model that prioritizes speed and volume and that treats labor as a cost to be minimized. Injury rates remain elevated, severe injuries are common, and, in the case of companies like Amazon, business practices like fissuring complicate enforcement of labor standards for workers in high-risk and dangerous occupations.

The SOC analyses also highlight why voluntary corporate commitments are insufficient to address these risks. Amazon, for example, has publicly committed to improving worker

¹⁸ The serious injury (DART) rate of 7.2 is calculated from aggregate injury data for 2022 through 2024. The New York City Comptroller’s report used the 2023 national DART rate as a comparison, which was the most recent figure available at the time of publication. This testimony updates that comparison using the 2024 national DART rate, which the Bureau of Labor Statistics has since published. U.S. Bureau of Labor Statistics. "TABLE 1. Incidence rates(1) of nonfatal occupational injuries and illnesses by industry and case types, 2024." Accessed April 2026, <https://www.bls.gov/iif/nonfatal-injuries-and-illnesses-tables/table-1-injury-and-illness-rates-by-industry-2024-national.htm>

¹⁹ As of April 8, 2026.

safety for years, yet its injury rates have continued to exceed industry averages and remain far higher than its own stated targets. Absent enforceable standards and meaningful oversight, these unsafe conditions are likely to persist as the demand for rapid delivery continues to grow.

The Council now has before it a proposal for a practical and necessary mechanism for protecting workers and the communities they live in. The Delivery Protection Act establishes standards intended to improve safety and accountability across the last-mile delivery sector. These are baseline requirements for an industry whose operations affect not only workers when they're inside facilities, but also their day-to-day health as friends and neighbors in our communities.

April 6, 2026

Hon. Harvey Epstein, Chair
Members of the New York City Council
Committee on Consumer and Workplace Protection

RE: Opposition to Int. No. 518 – Last-Mile Facility Licensing Ordinance

Chair Epstein and Committee Members:

On behalf of the Supply Chain Federation (SCF), a national trade association representing ports, warehousing, transportation, retail, labor, and other critical links of the supply chain, we respectfully oppose Int. No. 518.

Every day, millions of New Yorkers rely on last-mile delivery for essential goods, from groceries and medicine to everyday household necessities. This system is supported by a highly coordinated network of local facilities, workers, and small businesses embedded in communities across the City. While we share the Council’s commitment to safety and accountability, this ordinance, as drafted, would significantly disrupt that system and create serious unintended consequences.

Broad Scope with Significant Small Business Impact

The ordinance broadly defines “last-mile facilities” to include warehouses and logistics hubs that distribute goods to final consumers. This captures a wide range of operations, including thousands of small- and medium-sized, often family- and minority-owned businesses that are essential to neighborhood-level commerce.

The cumulative requirements of licensing, compliance disclosures, and ongoing regulatory oversight create a framework that smaller operators are least equipped to absorb.

As a result, the proposal risks:

- Disrupting an estimated 4,000+ small businesses in New York City’s delivery network
- Forcing smaller operators out of the market due to cost and administrative burden
- Accelerating consolidation among a limited number of large firms

For many local businesses, this is not incremental change, it is a direct threat to their ability to operate.

Workforce Disruption and Job Loss

The ordinance requires that core delivery and warehouse services be performed through direct employment and restricts subcontracting, which is a fundamental shift from how last-mile logistics operates today.

Currently, the system relies on small delivery businesses, independent operators, and flexible staffing models. Under this ordinance, many of these models would no longer be viable, effectively eliminating the business structures that support a significant portion of the workforce.

Larger operators, faced with higher labor costs, increased liability, and operational constraints, are unlikely to absorb all existing workers. Instead, they will reduce headcount, consolidate operations, or restructure service models to manage risk.

As a result:

- Hundreds to thousands of workers could face job loss or displacement
- Small business operators and entire teams could be pushed out of the industry
- Remaining jobs may offer less flexibility, fewer options, and reduced opportunities for advancement

Rather than expanding opportunity, the ordinance risks concentrating employment among fewer, larger employers, limiting worker choice and pathways to entrepreneurship.

Increased Costs, Reduced Efficiency, and Consumer Impacts

The ordinance introduces significant operational and financial burdens. This includes licensing requirements, compliance costs, and liability exposure that will be passed through the supply chain and onto consumers.

This will likely result in:

- Higher delivery costs for consumers and businesses
- Slower delivery times and reduced service reliability
- Reduced access to essential goods, particularly in underserved communities

Complex and Uncertain Regulatory Framework

The ordinance establishes a layered compliance regime, including licensing approvals, training mandates, recordkeeping requirements, and enforcement mechanisms, that creates significant uncertainty and increases the risk of inadvertent non-compliance, particularly for small- and mid-sized businesses.

Conclusion

While well-intentioned, Int. No. 518 would impose sweeping and complex requirements that threaten small businesses, displace workers, disrupt the supply chain, and increase costs for New Yorkers.

We respectfully urge the Council to oppose this legislation and instead work collaboratively with stakeholders to develop balanced solutions that improve safety and accountability without undermining the efficiency, accessibility, and economic opportunity that the last-mile delivery system provides.

Thank you for your consideration. If you have any questions, please contact sarah@supplychainfederation.com.

Sincerely,



Sarah Wiltfong
Chief Advocacy & Public Policy Officer
Supply Chain Federation

April 11, 2026

TerraCRG to The Committee on Consumer and Worker Protection Regarding Intro 518

TerraCRG is a Brooklyn-based commercial real estate brokerage firm specializing in investment sales, leasing, and advisory services in Brooklyn, NY. We appreciate the opportunity to provide comments on Intro 518 (Caban).

I am Dan Marks, CEO of TerraCRG. I have spent nearly 15 years working in Brooklyn's commercial real estate market—first as a broker and investment sales specialist, then as a Partner, and now as CEO—overseeing more than two billion dollars in transactions during my time at this firm alone. I have had a front-row seat to Brooklyn's industrial market evolving from an undervalued and overlooked asset class into one of the most sought-after segments of the New York City real estate market. That transformation did not happen by accident. It was driven by investment, by policy stability, and by the confidence of owners and tenants that Brooklyn was open for business. Intro 518 puts that confidence at serious risk.

From my vantage point as CEO of a firm that has brokered billions of dollars in commercial transactions across Brooklyn, I can say with certainty that last-mile and logistics real estate has been one of the most consequential drivers of industrial market health in this borough over the past decade. The demand from last-mile operators has brought capital into properties that sat dormant for years, created jobs across construction, property management, and operations, and generated property tax revenue that benefits every New Yorker. Our brokers work with these owners and tenants every day, and the activity we see in this sector reflects how critical it is to Brooklyn's economic health.

Brooklyn's industrial corridors function as the backbone of New York City's delivery and distribution network. The firms operating out of these facilities are not abstract corporate entities. They are employers, taxpayers, and anchors for the small businesses that depend on them. For every large logistics operator, there is a web of smaller companies—local delivery contractors, fleet maintenance providers, materials suppliers—whose livelihoods are tied directly to the presence of those larger users. Push the anchor tenants out, and that entire ecosystem follows.

Intro 518 would impose licensing requirements and operational mandates that, in practical terms, make it significantly more expensive and legally risky to operate a last-mile facility within New York City. As a result, operators will relocate to markets with less regulatory burden—New Jersey, Long Island, the Hudson Valley. That relocation does not eliminate the delivery demand that New Yorkers generate every day. It simply means those deliveries originate from farther away, require larger vehicles, and create more congestion on the very corridors—the BQE, local cross-borough routes, and neighborhood streets—that this legislation claims to protect.

The real estate investment implications are equally serious. Owners who have repositioned industrial properties depend on a predictable regulatory environment to justify those commitments. In our experience advising clients across Brooklyn's industrial market, regulatory uncertainty is one of the most reliable ways to slow capital deployment. If the bill passes, investment decisions that would otherwise move forward will stall or shift to other markets.

The City also cannot afford the property tax consequences of displacement. Research has shown that last-mile facilities developed over the past decade generate dramatically more in annual property tax revenue than the properties would have produced under prior use. Brooklyn has benefited enormously from this dynamic. Reversing it—by making the borough inhospitable to the tenants driving that value—would represent a significant and lasting fiscal loss.

TerraCRG is deeply committed to Brooklyn's future. That commitment is precisely why we are here today. We urge the City Council to work collaboratively with the real estate and logistics industries to identify solutions that address legitimate worker and community concerns without dismantling the industrial economy that has made Brooklyn one of the most dynamic urban markets in the country. The stakes—for jobs, for tax revenue, for neighborhood vitality, and for the small businesses that depend on this ecosystem—are too high to get this wrong.

Thank you for considering these comments.

CONTACT:

Dan Marks

CEO

TerraCRG

April 11, 2026

TerraCRG to The Committee on Consumer and Worker Protection Regarding Intro 518

TerraCRG is a Brooklyn-based commercial real estate brokerage firm specializing in investment sales, leasing, and advisory services in Brooklyn NY. We appreciate the opportunity to provide comments today on Intro 518 (Caban).

I am Daniel Lebor, a Partner at TerraCRG with years of direct experience in Brooklyn's industrial real estate market. I work daily with property owners, tenants, and investors who rely on the continued vitality of Brooklyn's industrial corridors—particularly those that support last-mile logistics and distribution operations. Our brokerage represents a wide range of clients, from individual property owners to institutional investors, and we have a ground-level view of how policy changes affect real estate values, leasing activity, and long-term investment decisions.

Brooklyn's industrial market is not simply a collection of warehouses and loading docks—it is a functioning ecosystem that supports thousands of jobs and underpins the daily logistics needs of millions of New Yorkers. The industrial properties our team brokers are increasingly sought after by last-mile and logistics operators who require proximity to dense urban populations. This demand has driven meaningful investment in underutilized and formerly blighted properties throughout Brooklyn, generating property tax revenue, construction activity, and permanent employment.

Intro 518 would impose significant licensing requirements, employment mandates, and operational burdens on last-mile facilities—requirements that, in our direct experience advising tenants and landlords in this space, would make these facilities economically unviable within New York City. We have already seen, in our brokerage work, how regulatory uncertainty causes tenants to pause lease decisions and how capital hesitates before committing to markets perceived as hostile to logistics use. Intro 518 would accelerate that dynamic dramatically.

If last-mile operators are pushed out of Brooklyn—to New Jersey, Long Island, or elsewhere—the ripple effects on the local real estate market will be severe. Industrial vacancy rates will rise. Properties that have been thoughtfully repositioned and modernized will sit idle or be forced into lower-value uses. Investment in capital improvements, which we have witnessed firsthand as brokers helping owners prepare buildings for institutional-quality tenants, will come to a halt. The loss of these tenants does not mean the delivery demand disappears—it means that demand is served from farther away, by larger vehicles, through more congested corridors, with less accountability to New York City's communities.

As commercial real estate practitioners, we track the economic contribution of these properties closely. The redevelopment of industrial assets in Brooklyn for logistics use has generated substantial property tax growth for the City. Displacing these tenants undermines a critical and growing source of municipal revenue at a time when the City cannot afford to sacrifice it. According to research cited by REBNY, last-mile facilities developed over the past decade generate significantly more in annual property tax than the properties would have under prior use—representing a meaningful and compounding benefit to City finances.

From a commercial real estate perspective, the passage of Intro 518 would also send a damaging signal to the investment community. Owners and developers who have repositioned industrial properties depend on a stable regulatory environment to underwrite those investments. Introducing the operational uncertainty and cost exposure that Intro 518 would impose will make future investment decisions harder to justify, discouraging the kind of ongoing commitment to Brooklyn's industrial base that this market depends on.

TerraCRG strongly encourages the City Council to engage with the real estate and logistics communities in developing alternative approaches that support workers and address neighborhood concerns without driving essential industrial users out of New York City. We are committed to Brooklyn's long-term economic health and stand ready to contribute to that conversation.

Thank you for considering these comments.

CONTACT:

Daniel Lebor

Partner

TerraCRG

April 9, 2025

**Terreno Realty Corp. (NYSE: TRNO) to The Committee on Consumer and Worker Protection
Regarding Intro 518**

Terreno Realty Corp. is an owner and operator of infill real estate across six coastal markets in the United States. Over the past 17 years, we have built a portfolio that varies in scale but remains uncompromising in both functionality and location. In the last five years alone, we have acquired multiple sites across Brooklyn, Queens, and the Bronx, gaining firsthand insight into the critical role last-mile delivery infrastructure plays in New York City's economy.

We are not ground-up developers, nor short-term owners. We take pride in holding assets that create lasting value for our investors and for the communities we operate in. Intro 518 (Caban) would have direct and adverse effects on the local, national, and international businesses that are essential to serving all five boroughs.

Last-mile facilities directly support New Yorkers' daily needs and generate considerable economic benefits for the City, including building investment, property tax generation, and job creation. A modern, well-located distribution network must also support the growing demand for e-commerce.

The development of last-mile facilities has led to brownfield cleanup, energy-efficiency investments, improved truck queuing that is less disruptive to surrounding neighborhoods, and stormwater management that would not otherwise occur.

Intro 518 overlooks the fundamental structure of the last-mile industry and would produce a chilling effect on the logistics ecosystem, discouraging future last-mile investment in New York City. The bill's licensing and employment mandates would introduce significant risk, fixed costs, and ongoing operational burdens for last-mile facilities. Faced with increased regulatory uncertainty and higher costs, facilities may choose to relocate to nearby markets, such as New Jersey or Long Island. These additional complexities will directly impact future industrial investment in NYC prohibiting both institutional and local investment in the market which has been crucial for the revitalization of certain areas.

Fewer last-mile facilities in NYC would not reduce delivery demand. Instead, it would lead to longer delivery routes, the use of larger trucks, and [increased congestion on key corridors, including the BOE, crossings, and local streets](#). Siting last-mile facilities close to the end consumer supports the use of electric vehicles (EVs) by enabling shorter routes and more efficient, dense deliveries. Pushing these facilities outside the city would likely force operators to revert to gas-powered fleets, undermining progress toward climate goals.

Facility relocation would also result in a loss of critical tax revenue for New York City. According to a [study executed by HR&A and AKRF](#), the properties developed as last-mile facilities over the past decade generate \$8.4 million more in annual property tax revenue for the City than they would if they had not been redeveloped, roughly tripling their tax contributions. Losing these facilities undermines a key and growing revenue source for essential City services.

Terreno Realty Corp. strongly supports alternative initiatives to advance a modern, sustainable logistics ecosystem. As highlighted in the [NYC Industrial Plan](#), these include activating Blue Highways to move freight by waterways, expanding micro-distribution models to reduce large truck traffic, and accelerating the shift to EV fleets.

New York City's last-mile delivery network is a critical engine of its economy and daily life. Intro 518 would destabilize this system, resulting in higher costs, more congestion, and fewer opportunities for New Yorkers. We urge the City Council to collaborate with stakeholders in developing alternative solutions that maintain investment, support jobs, and advance a growing and efficient logistics ecosystem for the benefit of all New Yorkers.

Thank you for considering these points.

CONTACT:

Hayes Graham

Senior Vice President – NYC

Terreno Realty Corp.

hayes@terreno.com



42 Broadway, 21st Floor
New York, NY 10004
www.alignny.org

Testimony to the Committee on Consumer and Worker Protection in support of Int. 0518-2026

Board of Directors

April 9, 2026

Stuart Appelbaum
*President, Retail
Wholesale Department
Store Union*

Eddie Bautista
*Executive Director, NYC
Environmental Justice
Alliance*

Henry Garrido
*Executive Director,
AFSCME District
Council 37*

Lucia Gomez,
*Political Director,
NYC Central Labor
Council*

Bernadette Kelly,
*Consortium for Worker
Education*

Zachary Lerner
*Deputy Executive
Director, New York
Communities for
Change*

Jose Lopez
*Co-Executive Director,
Make the Road NY*

Cynthia Travieso
*Political Director
Community Voices
Heard*

Thank you to the Chair and Committee for the opportunity to submit testimony. My name is Theo Moore, and I am testifying on behalf of ALIGN: The Alliance for a Greater New York. We bring together labor, climate, and community for a more just and sustainable New York. ALIGN continues to scrutinize and fight back against the practices of large corporations that operate with far too little accountability to workers, communities, and our environment.

ALIGN expresses strong support of the Delivery Protection Act because the rapid expansion of last-mile delivery has created an urgent public safety, worker protection, and environmental crisis in New York City.

Over the past several years, e-commerce deliveries have surged dramatically, from approximately 1.1 million packages per day in 2017 to 2.5 million packages per day in 2024. This explosive growth is fueling increased traffic congestion, air pollution, and dangerous street conditions across the five boroughs. Many last-mile facilities are concentrated in low-income communities of color, compounding longstanding environmental injustices.

The last-mile delivery industry is locked in a race to the bottom, where companies compete to offer ever-faster delivery times, sometimes as short as one hour. This model places enormous pressure on delivery workers, forcing them into unsafe practices just to keep up.

Every year, millions of safety-related traffic violations tied to last-mile delivery vehicles undermine the City's ability to protect pedestrians, cyclists, and other drivers. These include double parking, blocking hydrants, obstructing bike and bus lanes, and speeding. The consequences are severe: In neighborhoods where last-mile facilities have opened, truck-related crashes have increased by 146 percent, and truck-injury crashes have risen by 137 percent.

The Delivery Protection Act is a necessary step toward restoring accountability and protecting New Yorkers. While this legislation applies

to all last-mile operators, it is impossible to discuss this industry without addressing Amazon's outsized role. As an industry leader, Amazon has fundamentally reshaped consumer expectations around delivery speed, driving the entire sector toward increasingly dangerous and unsustainable practices.

Central to Amazon's model is its Delivery Service Partner (DSP) program. This structure allows Amazon to shift risk and responsibility away from one of the wealthiest corporations in the world and onto small contractors and individual workers. Under this system, drivers are pushed to meet extreme quotas without adequate protections, while Amazon maintains control over routes, performance standards, and delivery timelines. This arrangement does not represent genuine small business empowerment. Rather, it represents the outsourcing of risk and liability. Exemplifying this contradiction, Amazon just recently held a contest offering \$1,000 prizes to DSP drivers, those very people Amazon claims are "another business' employees," to [say they love their job](#) at Amazon.

Amazon has argued that legislation like the Delivery Protection Act would harm small businesses. This claim is misleading and should be rejected. Amazon's business practices have consistently undermined small businesses - its online platform, [Amazon.com](#), is a prime example. Amazon uses its market dominance to impose restrictive pricing rules, extract increasing fees from sellers, and pressure businesses to use its logistics network in exchange for visibility. There are also well-documented cases of Amazon using data from third-party sellers to replicate and undercut their products. Amazon's model consolidates power while externalizing harm to small businesses and workers alike.

The ills of the current system listed here are based in well-documented fact. Reports from the New York City Comptroller and federal investigations have highlighted the links between rapid delivery demands, unsafe working conditions, and increased traffic violence. These findings make clear that without intervention, the situation will continue to worsen.

The Delivery Protection Act offers a path forward. **By establishing clear standards and accountability for last-mile delivery operators, this legislation will help protect workers, improve street safety, and reduce the disproportionate environmental burdens placed on vulnerable communities.**

New York City has long been a leader in advancing worker protections and environmental justice. Passing the Delivery Protection Act is an opportunity to continue that leadership and ensure that the convenience of fast delivery does not come at the cost of human lives, worker dignity, and community

health.

We strongly urge the Council to pass Intro 0518 and to stand with workers, communities, and all New Yorkers who deserve safer streets and a more just economy.

Thank you for your time and consideration.

Theodore Moore

Executive Director

ALIGN: The Alliance for a Greater New York

Good morning Chair and members of the Committee on Consumer and Worker Protection, and thank you for the opportunity to testify.

My name is Zara Nasir, and I'm the Executive Director of The People's Plan NYC, a citywide coalition advancing a more just and equitable budget. I'm here today to speak about the Department of Consumer and Worker Protection and its role in holding corporate actors accountable as part of our broader Make 'Em Pay campaign.

Right now, New York City is owed at least \$1.5 billion in unpaid penalties from large corporations and bad-actor landlords whose violations harm workers, tenants, and small businesses.

DCWP is responsible for enforcing some of the most important worker protections and consumer laws in our city — from wage theft and paid sick leave to unfair business practices. And it does a tremendous amount for what it costs. It's one of the best bargains in the city budget when it comes to protecting workers and consumers — but it is still under-resourced relative to the scale of violations it is meant to address.

When enforcement is weak, bad actors treat penalties as optional — just a cost of doing business — while workers lose wages, consumers are exploited, and responsible businesses are undercut.

That's why we are calling on the Council to significantly invest in DCWP's enforcement capacity — including doubling its budget to \$135 million and adding 400 inspectors, investigators, and legal staff. The Department itself has today at your hearing named that they need that resources

This is about deterrence, fairness, and protecting New Yorkers — and it's part of a broader shift we're pushing for: real corporate accountability across agencies. Our campaign is focused on improving collections and imposing real consequences for corporate bad actors, and we know that some of the most effective collections work happens at the agency level.

Because corporations won't change their behavior unless there are real consequences.

Meanwhile, New Yorkers follow the rules every day — and when they don't, they are penalized. This is about fairness. Corporations should follow the law too, and face consequences that are proportional to the harm they cause — especially when that harm affects the health, safety, and wages of New Yorkers.

We're proud to be joined in this campaign by over 40 organizations and unions — including worker justice groups like Workers Justice Project, Brandworkers, and the New York City Coalition for Domestic Work — along with more than 10 elected officials and Council Members, and growing.

We would love the Council's partnership in this work.

New Yorkers follow the rules every day. Corporations should too.

Thank you.

SUBJECT: Council Should Pass the Last Mile Bill and Double DCWP Funding (Make 'Em Pay)

Good morning Chair and members of the Committee on Consumer and Worker Protection, and thank you for the opportunity to testify.

My name is Alan Abraham, and I am the director of organizing and advocacy with The People's Plan. I'm here today to support Council's passage of the Last Mile bill and also support the future enforcement of this bill by advocating for the Make Em Pay campaign, which pushes to double the budget of the Department of Consumer and Worker Protection.

First and foremost, this is a public safety bill that will benefit all New Yorkers. Right now, the City is not able to adequately hold Amazon, a multi-billion dollar company, accountable for traffic and labor violations because it relies on a web of third-party contractors operating in underpaid, unsafe, and unstable conditions.

The provisions of this bill [including licensing last-mile facilities, requiring direct employment, and strengthening protections against retaliation] will reduce traffic violence, improve workplace conditions, and begin to hold companies accountable, including for millions in unpaid fines. And while Amazon is a key example, this bill is ultimately about setting standards for an entire fast-growing industry.

But passing strong laws is only half the equation; they must also be enforced.

Right now, New York City is owed at least \$1.5 billion in unpaid penalties from large corporations and bad-actor landlords. Agencies like DCWP are tasked with enforcing critical worker and consumer protections, but they are under-resourced relative to the scale of violations they face.

When enforcement is weak, corporate bad actors treat parking tickets and penalties as optional — just a cost of doing business — while our streets become less safe due traffic violations, workers lose wages, consumers are exploited, and responsible businesses are undercut.

That's why we are calling on the Council to significantly invest in DCWP's enforcement capacity — including doubling its budget to \$135 million and adding 400 inspectors, investigators, and legal staff.

This is about making sure laws like the Last Mile bill actually work in practice. It's about deterrence, fairness, and protecting New Yorkers — and it is a key part of a broader Make 'Em Pay strategy to ensure corporate lawbreakers are held accountable across the board. Last mile drivers and workers deserve to be protected from irresponsible and unsafe employment practices. New Yorkers deserve safe streets and neighborhoods.

New Yorkers follow the rules every day. Corporations should too. This bill is about making that possible.

Thank you.

Fwd: YOUR THOUTS

1 message

Christian Curiel

Thu, Apr 9, 2026 at 10:24 AM

To: Gustavo Cassa

----- Forwarded message -----

From: Christian Curiel

Date: Wed, Apr 8, 2026 at 9:30AM

Subject: YOUR THOUTS

To: Mangone, Nick

Here is a revised version of your 2-minute speech with the supermarket/farm analogy removed and your personal story added.

Chair, members of the committee,

My name is Christian Curiel. I am the owner of an independent Delivery Service Provider here in New York City. I have been in business since 2023 and I employ about 100 people.

I am a first-generation American from a Dominican family that came here in the late 60s and early 70s. I am the first in my family to go to school here, the first to own a home here, and the first to own a business in this country. That is what this city is supposed to stand for.

I am not a shell company for anyone. My company has its own EIN, its own DOT and MC numbers, commercial insurance, and we pay city, state, and federal taxes. We follow DOT and labor rules and we provide real jobs for New Yorkers and their families.

Let me give you a couple of simple examples.

Think about Uber and cars and mechanics. Uber uses drivers who own or lease their own cars, and those cars are repaired at independent local shops. Imagine a law that says: "Uber must own every car and employ every driver and every mechanic directly.

Uber cannot contract with independent drivers or independent garages." That would wipe out a lot of small garages and small owner-operators who follow every rule, just because they do business with a big platform.

Now think about Amazon and local plumbers and electricians. Big companies like Amazon hire local electricians, plumbers, and HVAC companies to service their facilities. Those are independent, licensed trades businesses. Imagine a law that says: "If you work on an Amazon building, you must be employed directly by Amazon. Independent local trades companies are not allowed to contract with them." Again, the city would not be punishing unsafe or unlicensed work. It would be banning a normal, legal contract between two real businesses.

That is what this bill does to DSPs like mine. It doesn't just regulate safety or wages. It reaches into the private marketplace and tries to decide who we are allowed to do business with. It punishes legal, tax-paying companies with their own EIN, DOT, and MC numbers, not for breaking the law, but for having the "wrong" customer.

Instead of enforcing safety and labor standards equally on everyone, this bill bans an entire lawful business model and pushes small carriers like mine out of New York. When the government starts telling you which legal customers you can have, and which business relationships are forbidden even when they follow existing law, free enterprise in this city is in serious trouble.

If this bill passes, it will not hurt a logo on a building. It will hurt my 100 workers—drivers, dispatchers, and mechanics—who will lose stable jobs they have held since 2023. It will hurt a first-generation small business owner who did everything right: went to school here, bought a home here, built a company here, and followed the rules.

I ask you to reject this bill or fundamentally change it, so it targets actual bad actors and unsafe practices instead of destroying honest, tax-paying small businesses that are following the rules.

Thank you for the opportunity to testify.

Christopher Leon Johnson

4/9/26

[REDACTED]
Brooklyn NY 11213
[REDACTED]

To the committee on Worker and consumer protection.

Good day. My name is Christopher Leon Johnson and I am here to voice my OPPOSITION to Intro 518. I am here to say that I am not anti union and I am not anti worker. This bill will help divide the DSP operator and the rank and file workers. The DSP are regular folks that want to make a better lives for their families and other families. This bill will cause Amazon to Retaliate against not only the DSP, they will retaliate against the rank and file worker for the DSPs and the Labor Union workers under ALU teamsters one the bill become law. I and not keen or will be able to sleep at night knowing that I supported a bill that caused thousands of people to be out of a job. The problem with this bill is that the council is only listening to the professional grifter Theodore Moore/ Theo Moore of Align-NY and they are just doing what ever it takes to keep him happy. Theo Moore of Align-NY is a professional grifter that runs and acts like his bottom doesn't smell, hanger-on wannabe Ligia Gualpa that will do anything to reap the same fame and historic wins that she got with the deliverista laws. The problem with him is that he is pushing a bill where no matter where Amazon is deploying the workforce via outsourcing or direct, the workers are classified employees and not independent contractors. Uber has independent contractors, DoorDash and Lyft has independent contractors, Wonder and Grubhuh has independent Contractors. Even if They outsource, those latter apps excluding. Amazon has independent contractors. And those latter apps has mostly Migrants from Africa and Latin America including Mexico. The Amazon workers are employees that are justice involved as what Chris banks Bought up and or Transplants that want to secure a dead end job. This bill is not about protecting workers. It's all about lining up Theo Moore Pockets and to pave the way that Theo Moore tries his best to reap the same fame and rewards as the ever respected Ligia Gualpa via the backs of the expendable Amazon workers that should had kept Chris Smalls as the leader of ALU.

Uber and the delivery apps can not leave NYC. Josh Gold of Uber will lose his Career if he tells Uber to leave the biggest business market in the country. DoorDash can't. Wonder/Grubhub can't leave NYC.

Amazon can leave NYC. They wouldn't care. Jeff bezos makes a \$1k a second. He makes it in his sleep. If Amazon leaves NYC. Then thousands will be fired. Thousands that depends on Amazon to make their money will be out. While Jeff Bezos sleeps well making a million dollars a hour. Amazon will retaliate. Amazon is the master of retaliation. The DSPs will be out first then it's the workers. I can't support a bill that will be the cause of retaliation. The deliveristas Ligia and the FHv drivers Desai of Workers Justice Project and New York Taxi Workers Alliance figured it out with the help of Justin Brennan and Shekar Krishnan because they knew that if

they didn't they would had gotten backlash by their own members. When it comes to Theo Moore of Align NY and I Been around that guy more times than the minutes on a clock, when those workers get retaliated, he wouldn't pull a finger to help those folks save their jobs or find them a alternative to their Job Loss. Theo would just act like the Pompous arrogant clown he is ignore those voices and only turn to his minion Sandy Nurse to save his behind. I oppose this bill. I support my DSPs and the rank and file members of ALU TEAMSTERS, I don't support bills that will benefit grifters such as Theo Moore of Align NY. Tiffany Caban is a great person at heart. I think she's scared of Theo Moore, because since she's licensed by the New York Bar as a ATTORNEY. She knows that a employer especially Amazon can do things that Uber and DoorDash can't especially in New York State. Amazon will retaliate. I hope everyone has an alternative Job plan lined up when Amazon start firing workers starting with the DSPS. I oppose this bill. Thank you.

Sincerely

Christopher Leon Johnson

4/9/26

My name is Cole Stallone. I was born and raised in Lower Manhattan. I have worked at UPS since 2023 and was an E-Bike Delivery Driver for most of 2025. You may have seen these new vehicles around but ironically enough, Amazon doesn't consider them vehicles nor us drivers. This is just one way Amazon has manipulated the law to avoid regulations and provide protections for those that make Amazon the 2nd largest company in the world.

E-Bike training was run at an Amazon facility in New Jersey by Amazon employees with minimal experience doing the job. The process was more like on-boarding rather than something designed to create safe couriers. Actual driving time consisted of less than 15 minutes on the bike, driving and reversing in an empty parking lot.

Many of the unsafe events I have witnessed during my time can be blamed on Amazon's failure to directly employ us and properly train us. I witnessed my DSP owner get hit by a new rider at a slow speed and allow that rider to continue their route, due to low staffing and pressure from Amazon. A majority of on road accidents were caused by sending new hires out alone on the first day, again due to low staffing and pressure from Amazon. After complaining to Amazon and our DSPs about broken carts filled with the packages we deliver, I witnessed a cart fall off a truck and injure a young worker with no formal training in that task. They were disciplined and later fired.

Only Amazon benefits from this arrangement: not the DSPs owners caught in the liability trap nor the workers risking their lives on new equipment with limited training. Amazon does this to maximize their profit at the cost of a city that is less safe than it should be. This is why we need the Delivery Protection Act: to hold Amazon accountable as the employers they really are and create real consequences for their failure to provide meaningful safety training and protections from all kinds of retaliation. Thank you for your work and your time!

Connor Spence - Delivery Protection Act Testimony

Council Members,

My name is Connor Spence and I am the President of Amazon Labor Union - International Brotherhood of Teamsters Local 1. I am here speaking in support of the Delivery Protection Act.

As corporations like Amazon become wealthier and more powerful, the more theoretical the law becomes. Instead of serving as a tool of justice, the legal system becomes a toy, something to manipulate. A tool that allows companies like Amazon to exist in a state of constant contradiction.

I am one of the original organizers of the union campaign at Amazon's JFK8 facility in Staten Island, the warehouse where we won a historic union election in 2022. Four years later, Amazon still refuses to honor the results of that election. They are illegally refusing to come to the table and negotiate with workers, despite being ordered to do so several times, including as recently as last week.

In our case, they argued they don't believe the NLRB process was legitimate because it didn't reflect the will of a majority of employees. So over thirty units of workers at facilities across the country have unionized through a different process, one that starts with a majority of employees asserting their union status and giving the company every opportunity to challenge that majority. They claim that process is unfair too. To Amazon, no process is legitimate when workers win.

They went to federal court to argue that the National Labor Relations Act was unconstitutional, and that we need to throw out a century of labor law. But when workers sought to have labor violations addressed at the State level, Amazon intervened and said those cases needed to go to the NLRB, the same agency they believe should not exist.

They always want to have it both ways. This company does not operate on principle. They don't believe in the law. Their only north star is the pursuit of profit, and they'll do and say whatever it takes to make the most money possible.

So when Amazon tells us delivery drivers are not really their employees -- even though they wear Amazon uniforms, drive Amazon vans, and work under Amazon's complete control -- are we really supposed to believe that? Or are we going to acknowledge that as usual, they want to have it both ways. They want to be the boss without being the employer.

We need the Delivery Protection Act because we need stronger guardrails around what a company like Amazon is allowed to get away with -- how they're able to impact workers and our communities. Thank you.

April 6, 2026

My name is Duane Ronan; I am an employee of Dashwave Delivery Logistics.

Giving Honor to: My Creator, New York City Council Speaker Julie Menin, the other 50 members of the Council, CEO's of DASHWAVE DELIVERY- Jerard & Kris Basmagy, I greet you in the name of DELIVERY.

I briefly would like to talk about something called a re-attempt. A re-attempt is a delivery that has been attempted, but is not successful. There are many reasons for the delivery not being completed. For example, customer does not have the passcode, they did not provide access, they didn't update their notes, and/or the business was closed. There are other reasons too exhaustive to mention for the scope of this testimony.

In 2018, Amazon reached out to the other three carriers to deliver packages. Due to their non-acceptance, Amazon re-attempted again via Delivery Service Partners (DSP). Prior to my employment with any DSP, I was exposed to inconsistent work, non-livable wages with no benefits...I became a re-attempt. I was hired in 2019 and I have been working from that time until the present. I have received livable wages, three promotions, bonuses, 401K plan, medical and dental benefits, paid vacations, and paid sick time. The only thing I have not received is an all-expense paid trip to the Fiji Islands...Which I will be discussing with my bosses after today.

In conclusion, during the pandemic DSP's were labelled as essential workers. In *March 2020*, there was a package that came back to the truck twice that day. The box was labelled **PANTRY** with a Tudor City address. Everyone left for the day except for the truck driver and me. I was advised to give it one more try. When I arrived, there was an elderly woman rushing to bear hug me...Due to social distance, I initially dodged her...She told me with tears in her eyes...That prior to the government's declaration of the pandemic...Her adult children left the grandchildren with her, while they went on vacation. She attempted to grocery shop, but the shelves were bare...

She said and I quote, "that if I had not delivered that pantry box, her and her grandchildren would not have had a morsel to eat." Afterwards I let her hug me...She said, "THANK YOU & THANK GOD FOR THE RE-ATTEMPT!!!"

Testimony of Ira Pollock, six year Amazon worker from DBK1 and DBK4 in Queens

I worked for Amazon for six years, from October 2019 to October 2025. I worked night shift at two delivery stations, first in Woodside then in Maspeth.

I witnessed Amazon's daily disregard for the safety of workers and the public. In 2020, in the early weeks of the pandemic, my coworkers and I caught Amazon trying to hide a COVID outbreak in the warehouse. We had to walk out to get them to shut and clean the warehouse. In 2021, one of my coworkers was driving her car with her infant son in the backseat when they were struck by an Amazon van whose driver was rushing to finish his route. Her son lost his life. Amazon denied liability. In 2022, deadly floods hit NYC. The governor declared a state of emergency, instructing residents to stay home. Amazon still required us to report to work. The subway and roads flooded, stranding us at the warehouse. When trucks couldn't get through to bring us our volume, we had no work to do so Amazon tried to send us home without pay. Since transit wasn't working, they tried calling us Lyfts, which endangered the lives of those drivers as well.

I often worked in traffic control, directing drivers through the loading area. I witnessed first hand how Amazon's obsession with speed endangers drivers and the public. In a rush to get packages on the road as quickly as possible, Amazon managers send vans speeding all over the loading area while others worked on foot in the drive lanes. I've seen managers yell at drivers to "GO GO GO" to hit the gas while other workers are still loading their vans. In the chaos, I've seen drivers run into posts, back into walls, and almost hit pedestrians. Amazon claims it's not liable for any of this.

In my time at Amazon I tried to find a list of safety rules. I checked our employee handbook and our employee portal. I found a document called "Safety Guidelines", but it was locked. Employees couldn't access it. I asked managers and HR to help me get access. They said they'd look into it. When I checked the app again, the document had been removed entirely! I asked management for a physical copy. They told me that was against company policy.

Safety at Amazon does not exist. When management does reference it, it's a pretense for disciplining workers. This act will save lives.

Written Testimony in Opposition to the Delivery Protection Act New York City Council Hearing

To Council Member Harvey Epstein, Chair of the Committee on Consumer and Worker Protection and Members of the Committee,

My name is Jamal Harris, and I am a DoorDash delivery worker based in the Bronx.

By day I work full-time as a Program Manager at a nonprofit here in New York City, where I help guide young people through important transitions in their education. I take pride in where I am in my career today but it hasn't always been easy. Throughout my career shifts, DoorDash has been a reliable and empowering source of income.

I've been dashing since 2019 and for me, DoorDash is more than just a side job, it's like having access to extra hours of work when I need them, on my own schedule. As a father of three, with one kid in college and the other in daycare, that flexibility matters. The income I earn through dashing helps cover everyday expenses like childcare, phone bills, car costs, and more. It gives me financial breathing room and helps me stay stable.

A portion of my deliveries involve picking up from facilities like DashMart locations. These are basically small convenience stores or bodegas where delivery orders are stocked, organized, and prepared for delivery by the time I arrive, which helps make deliveries fast and easy. After I accept a delivery offer from one of these places, I simply head to the DashMart, pick up the pre-packaged order, and get on my way.

New regulations proposed in the Delivery Protection Act could make it harder for places like DashMarts to continue operating, effectively making it harder for me to make deliveries and earn money. That's why I hope the Council will decide not to pass this bill.

DashMart and places like it help fill important gaps by making orders more accessible and organized for Dashers like me. When that system works well, it allows me to earn more consistently in the limited hours I have available to earn on the app. And in this case, the system works well – and I like it.

I urge the Council to stop and consider the full, unintended impacts this bill could have on workers like me who rely on easy gig work opportunities to support our families. For me, DoorDash provides flexibility, stability, and access to income at my fingertips. Changes like this make it harder for the platform to operate facilities like DashMarts. If this bill forces them to close, delivery workers across the city will bear the brunt of the consequences.

I respectfully ask the Council to reject Intro 518-2026.

Thank you for your time and consideration.

Sincerely,

Jamal Harris
Bronx, New York

Jeff:

Hi my name is Jeffrey. I worked at DBK4 in Maspeth for about 2 years as an Amazon driver.

Have you seen Amazon drivers drag a bag-like box across the ground while delivering? This is because we need hand trucks to be able to do our jobs properly.

As delivery drivers, these handtrucks are extremely important. They take loads off our body and it helps us move the packages efficiently.

One day I was clocking into work I picked up my pouch with the Amazon van key and dispatch had a limited amount of hand trucks. I sadly didn't get one and I had many heavy, oversized packages and my management said " Amazon won't provide it for you guys, and they don't pay us enough money to buy hand trucks. **This is Amazon's fault.**"

However, when I go to Amazon directly about these issues it is neglected because Amazon states I do not work for them and tells me to contact my DSP about my issues. So, while Amazon gets to have their way and get their profits, the DSP is there for no reason just to take responsibility away from Amazon and exploit us. As Amazon drivers, we usually are not provided handtrucks and this is one reason why Amazon drivers are frequently getting injured. I always went home with aches and pains in my back, my shoulders, and my legs that I'm still dealing with currently, till this day.

You may think a hand truck isn't a big deal, but as a delivery driver this is extremely important for our safety. This was not a one-time occurrence, but one example out of many as to how Amazon hides behind their DSPs to avoid responsibility for our safety.

The Amazon drivers that deliver your package every single day are suffering. How do you expect Amazon drivers to do their job efficiently, save their body from injury and have a career job without the key tools to deliver safely ? Just like driving a car without a seatbelt, you wouldn't let your family drive without a key safety necessity?

Please, we need to pass the delivery protection Act, thank you for the opportunity to testify at this hearing.

Good morning Chair and members of the Committee,

My name is Joe Artus and I'm the owner of a delivery company operating in and out of New York City.

I started this business in 2020 and named it after my father — a Guatemalan immigrant who worked for the MTA for 38 years, who passed away from lung cancer in 2016.

I am the youngest of seven children, and everything I've built is rooted in the work ethic and stability he gave our family.

Today, I'm trying to create that same opportunity for others.

We actively hire through workforce development programs like

STRIVE, Interborough, Urban Upbound, and Henry Street Settlement —

organizations that focus on placing people who need work the most.

These are individuals rebuilding their lives, supporting families, and getting a real opportunity through this work.

At the same time, we've built an operating model that reduces congestion in New York City with walking delivery associates to complete routes in neighborhoods like Harlem.

If this bill is applied broadly, the impact is real:

- Smaller operators like mine will struggle to comply or be pushed out
- Opportunities for the exact workers these programs serve will shrink
- And the system will shift toward larger, less flexible operations

I fully support safe conditions and smart regulation.

But we need clear definitions and thoughtful implementation so that policies don't inadvertently harm small businesses or limit access to jobs for the people who need them most.

I respectfully ask that the Council ensure this bill doesn't unintentionally close doors for the very people we're trying to create opportunities for.

Thank you for your time.

Delivery Protection Act Testimony
Jose Huerta
DBK1 Amazon Driver

My name is José Huerta, and I live in Elmhurst. I have been an Amazon driver at DBK1 for four years.

I decided to focus on organizing after a particularly hot summer day when a coworker fainted. When she called the dispatcher, his response was: "Sit down, drink some water, and then continue with your route." The very next week, the exact same thing happened to another woman, and she received the exact same response when she called the dispatcher. I saw this as an opportunity to tell my coworkers that we could do something to put an end to this mistreatment—specifically, the fact that Amazon refuses to take any responsibility. That is why I reached out to the Teamsters; we held an initial meeting with ten coworkers to learn how to organize.

Someone tipped off the manager about what I was doing. The very next day, the owner of the DSP was waiting for me in the parking lot to have a word with me. I had no idea what it could be about. He asked me what I was up to. I replied, "What do you mean? I'm working." He told me, "No—a coworker told me you were involved in something else." I asked him, "What exactly did they tell you?" He used harsh language and insults to intimidate me as I denied the allegations he was making. He told me that if I had "other business" to attend to, I should go do it somewhere else. I challenged him to show me proof of what he was claiming. In that moment, my greatest fear was losing my job.

This should not happen to any worker who wants to organize. We have the right to organize—even while we are on the clock. We should not have to face retaliation when we try to improve our jobs and our working conditions. The passage of this law would provide a safer way for us to continue organizing and to demand what we deserve from Amazon. I ask everyone to please pass this law so that we—as Amazon workers and organizers—can gain greater strength and continue organizing our fellow coworkers.

Dear Council Member,

I am writing as the owner of a Delivery Service Partner (Amazon DSP) operation based in the Bronx. I was also raised in the Bronx as a child, worked in the Bronx with the City of NY with the goal of retiring as a Business Owner in the City of New York.

This bill will put all DSP operators like myself across the city out of business. We worked so hard to grow our business with now having 96 employees that were all hired in the Bronx, which will all be terminated if this bill is passed. I put in so much energy, effort and love to build the type of relationship with our drivers that Amazon will never be able to accomplish if Amazon will have to hire their own drivers.

An independent analysis by AKRF estimates that more than 50,000 NYC jobs could be lost if bill takes effect. Many of these jobs are held by minority individuals like myself.

Dear Members of the New York City Council,

I am here as a small business owner that operates in New York City to express serious concern regarding the proposed Delivery Protection Act and its potential impact on companies like mine, our employees, and the communities we serve.

Let me be clear: we support smart, fair regulation. Government has an important role to play in establishing guidelines that ensure safety, accountability, and equitable treatment of workers. In fact, those principles are core to how we operate every day. We prioritize safety above all else, provide strong wages and benefits, and actively create opportunities for growth and advancement for our team members—all of whom are New Yorkers building careers and supporting their families.

However, this legislation goes far beyond setting reasonable standards. It risks dictating how businesses must operate, rather than allowing responsible operators the flexibility to meet those standards in ways that work effectively. By potentially restricting widely used operating models and imposing significant structural requirements, the proposed law would place an outsized burden on small and mid-sized businesses that lack the resources of large corporations.

Ironically, policies like this may achieve the opposite of their intended goal. Instead of protecting workers, they risk:

- Forcing small businesses out of the market
- Reducing competition and opportunity
- Driving jobs out of New York City
- Increasing costs for consumers across the five boroughs

Large companies may be able to absorb these changes. Small businesses cannot. The result could be a less diverse, less competitive marketplace—one where independent operators are replaced rather than strengthened.

New York City thrives because of its small businesses. In the delivery and logistics sector alone, hundreds—if not thousands—of local companies provide stable employment, strong benefits, and real career pathways to New Yorkers. These businesses are not the problem—they are part of the solution.

We urge the Council to reconsider the current approach. Focus on setting clear, enforceable standards for safety, wages, and accountability—but allow businesses the flexibility to meet those standards without imposing rigid operational mandates that may unintentionally dismantle the very ecosystem that supports so many workers.

We stand ready to be part of a constructive dialogue and to work collaboratively on policies that protect workers while preserving the small business community that is essential to New York City's economy.

Thank you for your time and consideration.

Latrice:

Hi my name is Latrice and I worked as a driver at DBK4 for about two years.

Us drivers, we drive Amazon vans, we wear Amazon vests, and we deliver Amazon packages. We all work for Amazon. Yet, they constantly tell us that we don't.

One day while I was at work delivering those packages, my brother was murdered. When I found out later that night, I let my dsp management know.

The next morning I was with my family, grieving, when I got a call from the manager asking "where you at?"

It was when I came into the station to express to everyone what I had just experienced, an Amazon manager got involved. They told me that they wanted to help and gave me some phone numbers to call so that I could get access to services they had. When I called they connected me to a grief counselor. Later, someone else reached out to let me know that I didn't qualify for any of the services Amazon offered me, because I didn't work for Amazon.

So, after some time I had to return to work because I couldn't afford to take more time off. At times I cried delivering packages to doors because I was still grieving.

Amazon is the one that pays the dsp, and because the dsp needed me there at work they didn't care at that moment what I was going through. They just wanted the packages delivered. And when we all decided to stand up for ourselves and unionize, that's when Amazon retaliated against us.

I lost my job along with all my coworkers when Amazon illegally cut my DSP's contract. We got no warning, even though under the WARN ACT, we are supposed to get at least 60 days of advance notice. The next day I had no job, and I had to figure out how to get another income. I have my daughter who depends on me to put food on the table.

Amazon keeps getting away with this because they can put all the blame on the dsp.

Amazon will continue to break the law until we hold them accountable. That is why we need to pass the delivery protection act. Thank you for your time.

Chair Epstein and members of this committee:

My name is Lisa Sorin, and I am the President of the Bronx Chamber of Commerce. The Bronx Chamber is dedicated to supporting and advocating for local businesses across the borough, especially New York's smallest businesses. Thank you to the Council for continuing to engage with the small business community on workforce and regulatory issues.

I am here on behalf of the over 10,000 employees who will be severely impacted by this legislation, especially those in the Bronx whom I've had the opportunity to speak to.

There is a strong misconception that the Direct Service Providers (DSP's) mistreat their workers, and that this legislation would improve worker safety by ending the DSP model and mandating that companies like Amazon directly employ all workers. When preparing to make remarks on this bill, I took the time to speak with some of the Direct Service Provider (DSP) small business owners in the Bronx.

These are not faceless operators; they are entrepreneurs like Rudy, Jordan, Ron, Bashar, Ty, Amit, Joe, Kris and others who have built their businesses from the ground up. Those eight business owners alone employ over 1,200 people. They are all immigrants, veterans, or first-generation business owners who often started as delivery drivers themselves and worked their way up. They have achieved the American Dream, and are now working for their employees to do the same.

These DSP owners offer tuition reimbursement and workforce development opportunities, including HVAC training, ESL classes, and trade certifications. Many also provide loans, financial mentorship, and housing assistance, often helping individuals transition out of shelters and poverty. They are deeply embedded in their communities, including in the Bronx, where they host school supply drives, turkey giveaways, community barbecues, and sanitary product collections for women's shelters.

They, like any small business, offer something that large companies cannot replicate through direct employment: deeply personal, community-rooted relationships. Workers have direct access to their managers' cell phones and can turn to them for support during difficult times, an invaluable level of trust and connection that would be lost under this legislation. This is why their workers choose to work for these small businesses, instead of large multinational corporations. This bill is premised on the idea that these business owners and their employees would be better off working directly for large multinational corporations. It is not the Council's role to dictate to New Yorkers what their career will be. Taking away one's freedom to apply for and accept a job of their choice is not only wrong on a policy level, but on a moral one. Passing

a law that forces someone to shut down their business is morally wrong. Passing a law that puts one's employer out of business, and then forces them to work for an employer they do not want to work for, is morally wrong.

I know the supporters of this bill believe they are doing good. I ask those Council Members to more strongly consider the desires of those workers whose livelihoods will be impacted by their legislation. Thank you for the opportunity to testify and for your ongoing commitment to supporting workers and small businesses across New York City.

Luc:

Good afternoon. My name is Luc Albert Rene. I live in Jamaica, Queens and I have been an Amazon driver for 3 years.

Amazon doesn't care about our safety or anyone's safety on the road. Amazon only cares about Amazon's profits.

When I started driving for Amazon, I didn't get any real training. It was my first day and they gave me a van full of packages and put me on the road. I didn't know what I was doing, but somehow I made it through without hurting myself or someone else.

It didn't take long for Amazon's total disregard for our safety to catch up with me.

One day, I was delivering in the pouring rain. The sidewalk was slick and I slipped and fell hard on my knees. I could barely walk, but when I called back to the station to tell them about my injury, their only response was, "can you finish your route?"

"Can you finish your route?" What? Seriously?

And you know what, I did. I worked through the pain, because I knew that if I brought those packages back, there might not be a route for me the next day.

I've seen that happen to too many drivers. If we say a van isn't safe to drive or we put our own health first, then all of a sudden there isn't a route for us.

I want to be able to make a career in this industry. I want to be able to put my safety and the public safety first.

That's why we need the City Council to act. That's why we need you to pass the Delivery Protection Act. Protect us so we can protect all of you. Thank you.

Manuel Martinez - Delivery Protection Act Testimony

Good afternoon. My name is Manny Martinez. I live in Queens, and I'm a packer at JFK8, an Amazon warehouse in Staten Island.

I am blind, and there are many disabled workers like myself who work inside that building every day. We navigate the warehouse using what's called the "green mile," a walking path marked by raised green tape that is supposed to stay clear at all times and guide us safely to exits.

I'm here because I want to speak about safety violations at Amazon that the company has not been held accountable for.

A few months ago, during my shift, a fire alarm suddenly went off. In a moment like that, every second matters, especially for workers like me who rely on accessible pathways and support to get out safely. But when the alarm sounded, no supervisors came to assist me or any of my visually impaired coworkers. We were left to figure it out on our own in a chaotic, loud, and disorienting environment.

When I finally reached the main entrance with other workers, we were stopped. The doors were blocked, and we were not allowed to exit right away, even though the alarm was still going off.

I remember standing there, not knowing if there was an actual fire, not knowing if I was safe. For disabled workers like me, that kind of delay can be the difference between life and death.

This was not an isolated incident. There have been multiple times where I and other blind coworkers did not have a safe, clear, and supported exit during emergencies. And yet, nothing changes. There is no real accountability.

That's why I support the Delivery Protection Act. This bill would require Amazon to actually follow federal, state, and city safety laws if they want to keep operating in this city. Right now, they can violate those laws and face little to no consequences.

Please pass this bill so that workers like me can be safe on the job. Thank you for listening.

OPPOSING INTRO 518

New York City Delivery Protection Act

An Analysis of Commerce, Community, and Cost Impacts

Submitted by: Mark Chiusano | Washington Heights Last-Mile Operations | NYC Council Hearing, April 2026

Original Testimony

Good afternoon Chair and members of the Council,

My name is Mark Chiusano and I appreciate the opportunity to testify today opposing Intro 518, the New York Delivery Protection Act. The growth of delivery in New York City raises real questions around worker protections, sustainability, and how we manage our streets — and this dialogue is necessary.

I've worked in logistics for over 40 years, including helping launch one of the earliest last-mile delivery operations of its kind. What I've seen firsthand is that increasing the amount of deliveries to the community members in New York City doesn't have to mean more vehicles and emissions on our streets — in fact, it can mean far fewer trucks and reduced emissions.

In Upper Manhattan, our operation in Washington Heights supports about 100 employees every day, serving neighborhoods, hospitals, and businesses from 125th Street to 220th Street. While freight enters the city by truck, the final mile is completed almost entirely by foot couriers, e-bikes, and e-quads. This approach reduces congestion, cuts emissions, and is designed specifically for dense urban communities.

We've also helped pilot “Blue Highways” initiatives, using New York’s waterways to move goods instead of relying solely on roads. I take pride in being an active member of the NYC DOT Freight Advisory Committee, NY Vision Zero, the Urban Freight Lab, and numerous other industry and community charities and associations.

Just as important, this model creates real career pathways. Nearly every one of our dispatchers, supervisors, and managers started as couriers. We’re not just moving goods more sustainably; we’re building opportunity within the communities we serve.

I support safer streets, stronger worker protections, and sustainability. But this bill is not the way to get there.

Intro 518 will eliminate small businesses like mine, cost local jobs, and make it harder to invest in the very solutions that are reducing congestion and emissions today.

I urge the Council to reconsider this legislation and work with stakeholders on solutions that protect workers without eliminating small businesses and local jobs we've worked so tirelessly to create.

I also urge the Council to review the NYSDOL Guidelines for Determining Worker Status for the Courier Industry. It clearly states on page 10 of the Guidelines:

“Within the messenger industry, it is standard practice that bike and foot messengers (messengers) are considered to be employees of the messenger company providing delivery services to its customers.” — NYSDOL Guidelines for Determining Worker Status, Courier Industry, Page 10

However, there are more than 60,000 bike messengers in NYC being improperly classified as Independent Contractors. Let's start protecting these workers NOW and their rights by using the tools in the state's toolbox that already exist.

Thank you for your time and consideration.

Enhanced Analysis: The Real Impacts of Intro 518

The following section expands on the testimony above with data-driven analysis of Intro 518's projected effects on commerce, community, and costs — drawing on independent economic studies, industry reports, and the legislative record.

1. What Intro 518 Actually Does

Intro 518 — the New York Delivery Protection Act — would impose several sweeping mandates on last-mile delivery operations across all five boroughs:

- Requires a \$500 two-year licensing fee per warehouse facility
- Prohibits last-mile companies from contracting with third-party delivery firms, effectively requiring direct employment of all delivery workers
- Mandates companies maintain driver safety records and provide training on pedestrian safety, bike lane avoidance, and frequent-stop protocols
- Includes an employee retention clause that constrains operational restructuring
- Applies broadly to all last-mile delivery operations, not only large national carriers like Amazon

Key Context: There are approximately 40 last-mile warehouses across NYC’s five boroughs, concentrated in East New York and Red Hook in Brooklyn and Maspeth in Queens. More than 1 billion packages are expected to be delivered in New York City this year alone. The scale of disruption this bill could cause is significant.

2. Impact on Commerce: Who Really Gets Hurt

Supporters of Intro 518 frame it as targeting large corporations like Amazon. The reality is that the bill’s broad language and subcontracting prohibition would most severely impact the small and mid-sized businesses that form the backbone of NYC’s delivery ecosystem.

2a. Threat to Small and Minority-Owned Delivery Businesses

The subcontracting ban at the heart of Intro 518 would eliminate the Delivery Service Partner (DSP) model entirely. Hundreds of small, independently owned logistics businesses in neighborhoods like the Bronx, Brooklyn, and Queens were built on this model. These are not faceless corporations — they are local entrepreneurs who hire from their own communities.

As one DSP owner, whose Bronx-based company serves his neighborhood, testified at the April 10, 2026 hearing: “This is New York City deciding who gets to do business in this city. And if small businesses like ours are pushed out, those opportunities don’t grow.”

Factor	Impact
Estimated NYC jobs at risk (AKRF analysis)	10,000+
Current DSP driver workforce in NYC	~5,000
NYC last-mile warehouse facilities	~40
Packages expected to be delivered in NYC this year	1 Billion+
DSP workers earning avg. hourly wage (since Jan 2025)	~\$24/hr

The AKRF consulting firm’s independent economic analysis projects that more than 10,000 NYC jobs could be lost if this bill takes effect. These are not hypothetical future jobs — they are existing positions held by New Yorkers, many of them in lower-income communities that can least afford further economic disruption.

2b. Ripple Effect on Product-Based Small Businesses

The damage would not be confined to the delivery sector. Merchants and small product businesses that depend on last-mile infrastructure for distribution would suffer serious secondary impacts. For businesses with no physical storefront — selling exclusively through delivery channels — the disruption could be existential.

Example: A small NYC food business testified that Intro 518 “threatens the ability of some ‘last-mile facilities’ to operate unless they make significant operational changes — or shutter their operations entirely,” adding that the outcome “could be devastating, cutting off a key distribution partner and source of income.”

2c. The Subcontracting Model Is Already Regulated

It is critical for the Council to recognize that the DSP subcontracting model is not an ungoverned gray zone. Existing state labor law — specifically the NYSDOL Guidelines for Determining Worker Status in the Courier Industry — already provides a framework for distinguishing employees from independent contractors. The problem is not an absence of law; it is an absence of enforcement.

The NYSDOL guidelines state explicitly that bike and foot messengers are to be treated as employees of the messenger company. An estimated 60,000 bike messengers in NYC are currently being misclassified as independent contractors in direct violation of these guidelines. Intro 518 does not address this misclassification problem directly — but aggressive enforcement of existing state law would.

3. Impact on Community: Real Benefits at Risk

3a. Sustainable Delivery Innovation Would Be Stifled

The narrative that last-mile delivery inevitably means more trucks, more congestion, and more emissions is flatly contradicted by the reality of operations like the one in Washington Heights that I have helped build over more than four decades. When freight innovation is allowed to flourish within a competitive market of independent operators, the results speak for themselves:

- Final-mile deliveries completed almost entirely by foot couriers, e-bikes, and e-quads in dense urban corridors from 125th to 220th Street
- Active participation in NYC’s “Blue Highways” pilot, using waterways to shift freight off roads entirely
- A workforce model where nearly every supervisor and manager began as a courier — creating genuine upward mobility
- Contribution to advisory bodies including the NYC DOT Freight Advisory Committee, NY Vision Zero, and the Urban Freight Lab

Eliminating the subcontracting model that makes these operations economically viable would remove the financial flexibility that enables investment in e-bikes, e-quads, and waterway freight. Large corporations like Amazon could absorb the compliance costs of Intro 518 — innovative small operators almost certainly cannot.

3b. Career Pathways Would Be Eliminated

The last-mile delivery sector in New York City has become a genuine economic ladder for immigrant and working-class communities. The DSP model provides structured employment, competitive wages, and defined career trajectories for workers who may have limited access to other professional pathways.

Current DSP workers in NYC have earned an average of nearly \$24 per hour since January 2025. DSPs are required to offer health care coverage to full-time employees, provide paid time off exceeding the city's minimum by 20%, and many offer additional benefits including retirement accounts and tuition reimbursement.

If Intro 518 eliminates small DSP operators — as the economic analysis strongly suggests it would — these workers do not automatically become directly employed by Amazon. Many simply lose their jobs.

3c. Street Safety Concerns Are Real But Misdirected

The bill's strongest public argument rests on a NYC Comptroller report finding a 10% increase in crashes around 14 out of 18 new last-mile delivery facilities. This is a legitimate and serious concern. However, the data does not establish that the DSP subcontracting model is the cause of these crashes, nor that Intro 518's specific provisions would meaningfully reduce them.

Amazon's own data shows a 35.7% improvement in serious crash rates from 2024 to 2025 — during a period when the DSP model was fully in operation. This suggests that targeted safety interventions, technology adoption, and route optimization can deliver safety results without eliminating the small business structures that the bill would dismantle.

The bill's safety requirements — driver training, safety records, pedestrian awareness — are reasonable on their face. But they do not require eliminating subcontracting. These provisions could be decoupled and enacted independently, achieving the safety objectives without destroying the industry structure.

4. Cost Impacts: Who Ultimately Pays

4a. Direct Regulatory Cost Burden

The \$500 two-year licensing fee per warehouse is the least significant cost element of Intro 518. The true cost driver is the subcontracting prohibition, which would require all last-mile companies to directly hire, train, pay benefits, manage HR compliance for, and insure every delivery worker. For small DSP operators running on thin margins in a competitive market, this transition is not a cost adjustment — it is a business model termination.

Factor	Impact
Licensing fee per warehouse (2-year)	\$500
DSP operators at risk of closure (estimated)	Hundreds citywide
Estimated total NYC jobs at risk	10,000+
Estimated annual delivery volume, NYC	1 Billion+ packages
NYSDOL misclassified bike messengers in NYC	~60,000

4b. Consumer Cost Pass-Through

When delivery infrastructure consolidates — whether through business closures or forced restructuring — competition decreases and delivery costs rise. The opposition coalition, New York Delivers, has stated plainly that the bill will make delivery more expensive for city residents.

This is not speculation. It is a predictable consequence of eliminating the competitive market of small delivery operators that currently drives efficiency and holds prices down. New Yorkers, particularly those in lower-income neighborhoods who depend most heavily on delivery services for groceries, medications, and essential goods, would bear these costs disproportionately.

4c. The Hidden Cost: Lost Innovation Investment

Perhaps the most significant long-term cost of Intro 518 would be invisible in any short-term analysis: the investment in sustainable delivery infrastructure that will never happen. E-bike fleets, e-quad programs, Blue Highway pilots, and urban freight innovation all depend on the operational flexibility and competitive incentives that the current model provides. Mandate direct employment and eliminate subcontracting, and the capital that would have gone into these investments goes instead into compliance costs and legal fees.

New York City has set ambitious sustainability goals for its freight and logistics sectors. Intro 518 would systematically undercut the business conditions that make progress toward those goals possible.

5. A Better Path Forward

Opposition to Intro 518 is not opposition to worker protections, street safety, or sustainability. It is opposition to a blunt instrument that would destroy what it seeks to save. The Council has better tools available:

- **The NYSDOL has already established clear guidelines classifying bike and foot messengers as employees. The City should partner with the State to vigorously enforce these guidelines against the operators — including major app-based platforms — that are misclassifying 60,000 workers today.** Enforce existing law first:
- **The training, record-keeping, and pedestrian-safety provisions in Intro 518 can be enacted as standalone requirements applicable to all delivery operations, without the subcontracting ban that would eliminate small businesses.** Decouple safety requirements:
- **Rather than eliminate the competitive model that has produced e-bike and Blue Highway innovation, the Council should create incentives — tax credits, grant programs, permitting streamlining — that accelerate adoption of sustainable delivery methods.** Invest in sustainable infrastructure:
- **No legislation that restructures an entire industry sector should move forward without a genuine process of engagement with the small business owners, workers, and community members it will most directly affect. That process has not happened here.** Require stakeholder co-design:
- **Legislation narrowly focused on preventing worker misclassification and ensuring portable benefits would address the core worker protection goals of Intro 518's supporters — without eliminating the business structures that currently employ thousands of New Yorkers.** Target misclassification specifically:

Conclusion

New York City's last-mile delivery sector is not a monolith. It includes global corporations, but it also includes operations like the one I have helped build in Washington Heights over four decades — operations that have created sustainable employment, embraced green innovation, and built genuine community ties.

Intro 518, as written, does not distinguish between these actors. It applies the same regulatory hammer to a small community-rooted employer in Upper Manhattan and to a multi-billion-dollar national corporation. The results would be predictably unequal: large corporations would absorb compliance costs and continue operating, while small operators would close and their workers would be left without employment.

The Council can and should act to protect delivery workers, improve street safety, and advance sustainability goals. Intro 518 is not the mechanism to accomplish those ends. I urge the Council to reject this bill and to engage the industry — including the small operators and community-embedded businesses that this hearing has barely heard from — in developing legislation that achieves its stated goals without destroying the small business ecosystem that makes New York's neighborhoods work.

The tools to protect workers already exist in the state's toolbox. The obligation now is to use them — not to replace them with legislation that eliminates the employers those workers depend on.

Respectfully submitted,

Mark Chiusano

*Washington Heights Last-Mile Operations | 40+ Years in NYC Logistics
NYC DOT Freight Advisory Committee | NY Vision Zero | Urban Freight Lab*

Delivery Protection Act Testimony
Matthew Multari
DBK1 Amazon Driver

My name is Matt Multari, I live in Astoria and I drive for Amazon at DBK1. One day, on the BQE, my van's transmission was shot. I couldn't accelerate past 25, and then it dropped into neutral completely. I was stuck on a highway in New York traffic, decelerating well below the speed limit, unable to control my vehicle, and just trying to make it to the next exit safely. When I pulled over, my heart was racing and my ears were ringing. I almost died dressed like a tube of toothpaste and I'm here today to make sure it doesn't happen again to anybody.

How does Amazon endanger public safety through the DSP model? By pushing DSPs to have us drive broken vans. My DSP has told me that Amazon requires them to keep enough vans available to fill routes that can increase on a daily basis and doesn't pay them enough to afford all repairs. Amazon uses DSPs to avoid paying for van repairs and then pretends to care about safety to save face, as if they had nothing to do with the vans falling apart.

Amazon dictates how we do our job down to the smallest detail. If we go slower than it wants us to go, can't deliver all the packages, or don't follow the exact order of stops it tells us to follow, managers tell us we are in the "red zone" of the performance graph. Truth is, DSPs are constantly terrified of getting axed by Amazon, so they try to keep us terrified of getting axed if we go too slow. Hustling in NYC traffic means violating traffic laws by parking at hydrants and driveways, and doing so in vans that are falling apart.

City council, pass the Delivery Protection Act. Let us do our jobs safely, with equipment that works, and without being forced into dangerous situations by algorithms and people who have never had to lift 100lb of fancy mineral water up five flights of stairs. Amazon is a threat to the people of New York. Put it in check. Thank you.

Michael Lebron - Delivery Protection Act Testimony

Good afternoon. My name is Michael Lebron. I live in Staten Island, and I currently work at Amazon's JFK8 fulfillment center. Before that, I worked at a delivery station called DYX2.

I'm here today to speak about safety violations I witnessed at a last-mile facility and the broader lack of accountability at Amazon.

At DYX2, there's a process called TDR, Trailer Docking and Release. It's a critical safety role where workers secure trucks and ensure it's safe to load and unload packages. Because it's so dangerous if done incorrectly, only workers who are properly trained and annually certified are supposed to do that job.

But in my experience, especially during peak seasons like Prime Day and the holidays, those safety rules went out the window.

When things got busy, management pressured and sometimes directed untrained workers to help load trucks anyway. People without certification were put in positions where one mistake could seriously injure someone. I saw coworkers rushed into these roles, confused and unprepared, just to keep up with production.

This creates a dangerous environment not just inside the building, but for the public too, because if trucks aren't properly secured, those risks follow onto the streets.

And we've already seen what happens when safety fails. In April 2025, a worker named Leony Salcedo-Chevalier was killed during my shift at JFK8 after being struck by a reversing box truck. After his death, Amazon avoided responsibility by saying both he and the driver were contractors.

For workers like me, that sends a clear message: even when someone loses their life, the company can avoid accountability. We were never told what happened or whether it was a safety issue. When something that serious happens and workers are left in the dark, it shows how little oversight there really is.

That's why the Delivery Protection Act needs to be passed. It would ensure companies like Amazon follow the law and that all workers, no matter how they're classified, are protected by real safety standards and enforcement.

Thank you for listening.

Tristian Martinez - Delivery Protection Act Testimony

Good afternoon. My name is Tristian Martinez. I live in Staten Island, and I'm a worker at Amazon's JFK8 fulfillment center.

I've been organizing with the Amazon Labor Union since my union formed in 2021. I was part of the campaign that made JFK8 the first unionized Amazon facility in history.

I'm here today because I've seen firsthand how Amazon breaks labor law, and how they continue to get away with it.

Before our union election, Amazon ramped up its union-busting tactics. One of the main tools they used was something called captive audience meetings. These are mandatory meetings where workers are forced to sit and listen to anti-union messaging from the company while we're on the clock.

For weeks leading up to the election, we were pulled off the floor and required to attend these meetings over and over again. In those rooms, Amazon managers and consultants spread misinformation, telling us lies about union dues, making false claims about union leaders, and trying to scare us out of organizing.

In 2024, the National Labor Relations Board ruled that these types of captive audience meetings are illegal because they interfere with workers' rights to organize freely.

But Amazon didn't stop. Instead, they found a loophole. Now, new hires are exposed to anti-union propaganda on their very first day. They're told it's an "optional" part of their day 1 orientation, but they're not told what it actually is. Most people stay because they don't want to risk their job on day one. It's coercion disguised as a choice.

This is how Amazon operates: they push the limits of the law, and when they're told to stop, they find another way around it. There's no real accountability.

That's why I support the Delivery Protection Act. This bill would require companies like Amazon to actually comply with labor laws if they want to keep running their last-mile delivery operations in this city. If a company is breaking the law, they shouldn't get to keep doing business as usual.

Please pass this bill. Thank you to the City Council for holding this hearing and allowing workers like myself to testify.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Carlos Ortiz

Address: _____

I represent: DCWP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Mike Tiger

Address: _____

I represent: DCWP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Emily Hoffman

Address: _____

I represent: DCWP

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: April 9 2026

(PLEASE PRINT)

Name: Dussama Elyfiah

Address: 120 4th ave brooklyn

I represent: Falcons Delivery (DY46)

Address: 566 GULF Ave SE, NY 10314

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 519 Res. No. _____
 in favor in opposition

Date: 4-9-2025

(PLEASE PRINT)

Name: Josh Ponzani

Address: _____

I represent: Tenants List 804

Address: 44 S Bayler

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Daniel Ocampo

Address: 526 Hancock St, Brooklyn, NY

I represent: National Employment Law Project

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)
Name: COSMO JAWHITT

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4-12-2024

(PLEASE PRINT)
Name: David Washington

Address: _____

I represent: UBA Logistics

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: 4-9-2026

(PLEASE PRINT)
Name: Basher Hargis

Address: BRONX River Ave

I represent: LOGISTICS Xpress

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4-9-26

(PLEASE PRINT)

Name: Jahlaney Jarvis

Address: [redacted] Bronx NY

I represent: Logis Hcs Xpress

Address: 1055 Bronx river

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Alexander Haykanyan

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Katherine Pasamarelli

Address: [redacted]

I represent: Fairfax's Palmieries (DTY6)

Address: 566 Giff Ave 5 10314

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Joseph Gerzi

Address: _____

I represent: Highgate Logistics

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: _____

Address: _____

I represent: DashWave Delivery Logistics

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Dhianelle Gaudineer

Address: _____

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/26

(PLEASE PRINT)

Name: Kevin Daly

Address: [Redacted] Boston MA

I represent: RF

Address: LIC 31-10 48th Ave

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/2026

(PLEASE PRINT)

Name: Matan Dvor

Address: _____

I represent: Office of the NYC Comptroller

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/4/06

(PLEASE PRINT)

Name: Isabel AYACH

Address: [Redacted] Bronx NYC

I represent: 109th

Address: _____

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card



I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: 4/9/15

Name: Andrew Setlight (PLEASE PRINT)

Address: [Redacted] Harriman NY 10926

I represent: LBA Logistics LLC

Address: [Redacted] Harriman NY 10926

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card



I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: _____

Name: MITCHELL NEWMAN (PLEASE PRINT)

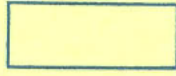
Address: [Redacted] LIC, NY 11101

I represent: MITCHELL'S NEWSPAPER DELIVERY

Address: [Redacted] LIC, NY 11101

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card



I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: _____

Name: Mark Chiusano (PLEASE PRINT)

Address: [Redacted] St. New Rochelle, NY

I represent: Net Zero Logistics

Address: 60 E 42, NY, NY 10165

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Melissa DASS

Address: _____

I represent: Small Businesses

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4-9-1993

(PLEASE PRINT)

Name: Jerome Sloss

Address: _____

I represent: Amazon Teamsters

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 04/09/2026

(PLEASE PRINT)

Name: Sarah Nur

Address: _____, Brooklyn.

I represent: All Boxes

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: Khadijah Howell (PLEASE PRINT)

Address: _____

I represent: Logistics Xpress

Address: 1055 Bronx river Ave

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: Lacey Tauber (PLEASE PRINT)

Address: _____

I represent: Brooklyn Borough President Reynoso

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: Julissa Alvarez (PLEASE PRINT)

Address: _____ CT Blauvelt NY

I represent: Zimela Routes Corp

Address: 216 Stephens Ave Bx NY 10473

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4.09.26

(PLEASE PRINT)

Name: Kenan Jones

Address: _____

I represent: Teamsters Local 804

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: JESSICA WALKER

Address: _____

I represent: Manhattan Chamber of Commerce

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 04/09/2026

(PLEASE PRINT)

Name: Tristian Martinez

Address: _____

I represent: ALU-IBT

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: RANDY PEERS

Address: 253 36th St. Brooklyn NY

I represent: Brooklyn Chamber of Commerce

Address: 253 36th St.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Tyrell Brown

Address: _____

I represent: Accelerated Flywheel

Address: 38 Delancy, NY 10002

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: 4/9/26

(PLEASE PRINT)

Name: Cole Stallone

Address: _____ NY, NY, 10038

I represent: For the bill

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. SIP
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Charles DiManna

Address: _____ Clifton NJ

I represent: Accelerated Municipal Legists -

Address: 38 Delancey St

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 4-9-2026

(PLEASE PRINT)

Name: Jose Huarte

Address: _____ Elmhurst NY 11373

I represent: DBK 1

Address: 2 Belova ave Woodside NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: April 9, 2026

(PLEASE PRINT)

Name: Sarah Thompson

Address: _____ New York NY

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Maria Montiel Decurte

Address: [REDACTED] Oakland 11364

I represent: DBK4

Address: Haspeth NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: 4-9-20

(PLEASE PRINT)

Name: LISA SORIN

Address: 1200 WATERS PLACE

I represent: Bronx Chamber of Commerce

Address: [REDACTED] Ave Bx

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: 4/9

(PLEASE PRINT)

Name: Connor Spence

Address: [REDACTED] 51 NW 10301

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/25

(PLEASE PRINT)

Name: Mikal Freseilla

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/25

(PLEASE PRINT)

Name: Ronak Shah

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/26

(PLEASE PRINT)

Name: David Rodriguez

Address: _____

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4-9-26

Name: George Vergara (PLEASE PRINT)

Address: _____

I represent: OLEK Express Inc

Address: 2569 Ocean Ave - Brooklyn NY 11229

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: Michael Leblan (PLEASE PRINT)

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: Manuel Martinez (PLEASE PRINT)

Address: _____

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 04/09/26

Name: ^(PLEASE PRINT) Mario Nicolaou

Address: [redacted] Old Bridge NJ 04857

I represent: Flash Direct Inc

Address: 2 Hopkinson Ct North NJ 07746

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: ^(PLEASE PRINT) Richard Miller

Address: [redacted]

I represent: Greater Living Dist.

Address: 602 Henlock

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: ^(PLEASE PRINT) George Kovanis

Address: [redacted] NY NY 11370

I represent: MIA Ground Service

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Damon Gilbert

Address: _____

I represent: New York Lawyers for the Public Interest

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/2026

(PLEASE PRINT)

Name: Ambrosio MARTE

Address: [REDACTED] Glendale NY 11385

I represent: Z STAR TRUCKING INC.

Address: 300 MASPETH AV. Brooklyn NY 11211

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/2026

(PLEASE PRINT)

Name: Don Novick

Address: [REDACTED]

I represent: NYC INDUSTRIAL DIVISION

Address: 185 VAN DYKE

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: TYBREY BARNES

Address: _____

I represent: NORTHSTAR logistics

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Timothy Dennis

Address: _____

I represent: Northstar Logistic

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Drew Weber

Address: _____ Brooklyn

I represent: Consortium for Worker Education

Address: 305 7th Ave, NY NY

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Roman Dekhterman

Address: [REDACTED] Morganville NJ 07751

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: GRIGOR TULERI

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/2026

(PLEASE PRINT)

Name: Jorge Palapa

Address: [REDACTED]

I represent: Palapa Co

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Ariel Miki

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/26

(PLEASE PRINT)

Name: Ada Alcantara

Address: _____

I represent: A3N Logistics LLC

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: JOCELYN VEGA

Address: _____

I represent: A3N LOGISTICS

Address: 1055 BRONX RIVER AVE.

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Derron Cunningham

Address: _____

I represent: A302

Address: 1055 Bronx River Ave

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: THOMAS GESUALDI

Address: _____ BRIARCLIFF MANOR NY

I represent: TEAMSTERS JC 16

Address: 250 8TH AVE NYC

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Zach Miller

Address: _____

I represent: Teachers Association of NY

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: DUNHAM V. Brooks

Address: [REDACTED] NYC NY 10035

I represent: KAIZER' DRIVEN & LEAD

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/76

(PLEASE PRINT)

Name: Lue Ahmed

Address: [REDACTED] Long Is. C. by, NY 11101

I represent: SPIN Logistics LLC

Address: 495 W 129th St

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Joe Artin

Address: [REDACTED]

I represent: WGA Transite

Address: 235 Hudson Blvd

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/26

(PLEASE PRINT)

Name: MARK FACCHIN

Address: [REDACTED] DOUGLASSTON NY 11362

I represent: BAM LOGISTICS LLC

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Joseph Watson

Address: [REDACTED] Expressway

I represent: _____

Address: [REDACTED]

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. ~~158~~518 Res. No. _____

in favor in opposition

Date: April 9, 26

(PLEASE PRINT)

Name: Charles Yu

Address: _____

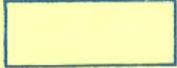
I represent: Long Island City Partnership

Address: 27-01 Queens Plaza N. Long Island City, NY 11101

◆ Please complete this card and return to the Sergeant-at-Arms ◆

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: AMIT SHARMA

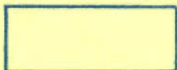
Address: _____

I represent: A3N LOGISTICS LLC

Address: 1055 BRONX RIVER AVE, BRONX NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: 4/9/20

(PLEASE PRINT)

Name: Shane Mitchell

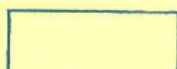
Address: [Redacted] New York NY

I represent: Hotel & Gaming Trades Council (HTC)

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Fuzel Osman

Address: [Redacted]

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Shawn Lawrence

Address: [REDACTED] N.Y.

I represent: NORTH STAR

Address: 511 BARREY ST

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Jerard Basma

Address: [REDACTED]

I represent: Dashware Delivery

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: JUAN MARTINEZ

Address: [REDACTED] Brooklyn NY

I represent: COTR Industries

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Lewis Leandry

Address: _____

I represent: LOGISTICS XPRESS

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. S18 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: MICHAEL ROMAN

Address: _____ Bx NY

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Sheries Smith

Address: _____ Brooklyn NY

I represent: Amazon DSP (Dashware Log)

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Joshua Villegas

Address: [Redacted] Bronx NY

I represent: Logistics press

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 04/19/2026

(PLEASE PRINT)

Name: Jordan Rodriguez

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Luc Landor

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Heaven Sanchez

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Rudy Cazares

Address: _____

I represent: Cazares Logistics

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Zach McHugh

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 04/17/26

(PLEASE PRINT)

Name: Kevin Velaz

Address: _____

I represent: J

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Ryan Bonilla

Address: 1055 Bronx River Ave

I represent: Logistics & Press

Address: 1055 Bronx River Ave

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: 4/19/26

(PLEASE PRINT)

Name: Kristofer Basman

Address: _____

I represent: My business

Address: 235 Veterans Blvd Rutherford, NJ

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/26

(PLEASE PRINT)

Name: Jesur Reyes

Address: _____

I represent: One Dream

Address: 1500 basset t ave

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/26

(PLEASE PRINT)

Name: Jeffrey Arias

Address: _____

I represent: Local 80th / Amazon

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/2026

(PLEASE PRINT)

Name: Antoine Andrews

Address: _____

I represent: Teamsters

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 04/09/26

(PLEASE PRINT)

Name: Christian Trimboli

Address: _____ Fresh Meadows NY

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/26

(PLEASE PRINT)

Name: Matthew Multari

Address: _____ Astoria, NY 11102

I represent: Teamsters Local 804

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 04/09/26

(PLEASE PRINT)

Name: Sic Albert Rene

Address: _____ Queens Village

I represent: Teamsters Local 804

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Richard Blum

Address: _____

I represent: UAW

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/9/2026

(PLEASE PRINT)

Name: Latrice Johnson

Address: _____

I represent: Self / Transfers

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Ira Pollock

Address: _____ Jackson Heights

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: John Moriarty

Address: _____ Brooklyn, NY

I represent: Strategic Organizing Center 11217

Address: 90 Broad Street, suite 710, NY, NY
11204

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: _____

Address: _____

I represent: _____

Address: _____ Brooklyn, NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: CHRISTINE CHAN

Address: _____

I represent: HIGH GATE

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 518 Res. No. _____

in favor in opposition

Date: 4-9-26

(PLEASE PRINT)

Name: Theodore Moore - Exec Director

Address: 42 Broadway

I represent: ALGN

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 2/10/74

(PLEASE PRINT)

Name: Junior Taveras

Address: _____

I represent: Hooks and Steel Corp

Address: 405 East 60th St

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Melissa McKay

Address: _____ Bruckly

I represent: Melissa McKay

Address: 224 Rader Ave Bruckly

Please complete this card and return to the Sergeant-at-Arms