

Testimony of Chair and Commissioner David Do New York City Taxi and Limousine Commission Before the City Council Committee on Transportation and Infrastructure February 10, 2025 Oversight – TLC: The Status of the Yellow Cab Industry

Good morning, Chair Brooks-Powers and members of the Committee on Transportation and Infrastructure. I am David Do, Chair and Commissioner of the New York City Taxi and Limousine Commission. I am here today with General Counsel Sherryl Eluto and Deputy Commissioner for Operations, People, and Innovation Evan Hines. Thank you for the invitation to provide an update on the city's taxi industry and start a dialogue on the set of bills on the agenda. As the oversight topic of this hearing is the taxi industry—following the oversight hearing held by this Committee in September, which concentrated on for-hire vehicles and commuter vans—I will focus my testimony on yellow cabs.

In recent months, yellow taxis have reported about 3.7 million trips each month. This represents a steady increase from previous post-pandemic months. In fact, the 3.8 million trips completed in October 2024 were the highest since early 2020. Taxi trips overall are at about 50-55% of pre-pandemic levels. Even before 2020, taxi trips were on the decline, with 11-13 million trips completed each month in 2015 and 6-8 million completed each month in 2019. So, while the longer trend in taxi trips has been one of significant decline, there are hopeful signs in the recent trip increases.

Similar positive trends are evident in other taxi-related data, including the numbers of drivers and vehicles on the road each month. Working drivers, working vehicles, and vehicles not in storage have been on a consistent rise, all hitting post-pandemic highs in recent months. For example, 9,768 taxis completed a trip in December of 2024, which is the highest number of active taxis since the 11,315 that completed a trip in March of 2020. Industry revenue is also on the rise, with hourly and monthly gross revenue for taxi drivers even exceeding 2019 levels thanks to the taxi fare increase TLC adopted in 2022. Industry farebox revenue is now consistently at about \$3 million per day, up over 40% from before the fare increase. In sum, while there are fewer trips than in 2019, there are also fewer drivers and vehicles, and each trip has more revenue potential, so on average those who are working are earning more than they did in 2019.

While it is still far too early to make any assessment on the impact of congestion pricing on the taxi industry, the early data is hopeful, with taxi trips up about 10% in the first week it was in effect compared to the same week in 2024, which is consistent with the general upward trend of taxi trips before congestion pricing went into effect. As we continue to monitor the data, we may see that some people are choosing to take taxis rather than use their personal vehicles in the central business district, reduced congestion allows taxis to complete more trips in shorter times, the general increase in taxi trips is strong enough to overcome the impact of the small additional surcharge, or, most likely, some combination of all these factors. TLC will continue to analyze the impact of congestion pricing on the taxi industry and all our licensed industries as more data



accumulates, and we will continue to show that data—and all the data I've mentioned today—on the TLC Factbook so the public can monitor the industry trends and impacts for themselves.

Perhaps the most impactful recent issue for the taxi industry has been wheelchair accessibility. As ordered by the federal district court, TLC adopted rules requiring all new taxis to be wheelchair accessible. This has a major impact on the finances of both the taxi industry and the TLC's Taxi Improvement Fund (TIF), which uses a one-dollar passenger surcharge to subsidize accessible vehicle conversions and accessibility programs. As more taxis become wheelchair accessible—which is of course a good thing—TLC has to make difficult decisions about how to allocate limited TIF money most efficiently and effectively to improve WAV service and make sure we meet the court-imposed deadlines for 50% of the taxi fleet to be accessible. We will continue to work with stakeholders from the taxi industry and the disability community to determine how we can increase accessibility while ensuring the continued economic viability of the industry.

This brings us to the bills on the agenda, and I will start with Intro 193. This bill would require all taxis and for-hire vehicles to display a decal warning passengers to look for cyclists when opening the door, with the decals being provided by TLC at no cost to vehicle owners. As a Vision Zero agency, the safety of all road users is TLC's top priority. For example, last year TLC launched our new Driver License Renewal Course, which includes Vision Zero material and simulations; in 2024 TLC issued 17,993 violations to TLC-licensed drivers for illegal parking, stopping, or standing, including for blocking a bike lane; and just last week we proposed new rules that would increase the penalty for these violations under TLC's Persistent Violator Program to better deter this behavior in the future. TLC has provided Vision Zero "look for cyclists" window decals to vehicle owners since 2012 and continues to do so at our Licensing and Inspection facilities and at outreach events. We also enlist industry stakeholders such as fleets and base owners to distribute the decals to their members on our behalf. We think this voluntary approach has worked well and has achieved widespread use of these decals without the enforcement measures that a requirement would entail. If the Council is interested in creating this new decal requirement, it may be worth considering a review of the numerous other required decalsrequired by state law, local law, and TLC rules—to avoid clutter, which runs the risk of passengers overlooking all the messages.





Intro 373 would allow taxi owners to extend their vehicle retirement dates during the COVID-19 state of emergency declared by the Governor. TLC understands the financial hardship that many drivers and vehicle owners sustained during the pandemic. TLC already has a process for vehicle retirement extensions and granted 3,775 during and in the aftermath of COVID from 2020 through 2023, granting 90% of extension applications over that period. Additionally, TLC recently amended its rules to eliminate the retirement schedules for wheelchair accessible vehicles in an effort to increase the number of WAVs on the road while also providing vehicle owners financial relief. As to the proposed bill, the COVID-19 state of emergency has long since lapsed, so it appears that this bill would no longer have the desired impact on retirement dates. More generally, because of the new WAV requirements discussed earlier, we have serious concerns that any retirement extensions for non-accessible vehicles would risk the taxi industry failing to meet the court-mandated accessibility thresholds discussed earlier. In other words, if a non-accessible vehicle's retirement would prevent a WAV from being put into service, reducing accessibility and causing TLC to run afoul of the federal court order. For these reasons, TLC opposes Intro 373.

Intro 676 would require TLC to conduct a study and issue a report on the costs and challenges of electrifying the TLC-licensed fleet. TLC's Green Rides Initiative, adopted in October 2023, requires high-volume for-hire services—currently Lyft and Uber—to dispatch 100% of their trips to electric or wheelchair-accessible vehicles by 2030, with annual benchmarks increasing until then. I'm proud to note that we are more than a year ahead of schedule on this effort: by the end of 2024, about 20% of trips were dispatched to EVs or WAVs, outpacing the 15% required in 2025. But I recognize that we have a long way to go, as a city and as a country, in electrifying the transportation sector, especially when it comes to charging infrastructure. An all-of-government approach, along with private investment, is needed to ensure that infrastructure keeps up with demand.

To help inform our public- and private-sector partners, TLC has recently published two electrification reports, the first in 2022 called *Charged Up!* and the latest called *Electrification in* Motion released in September 2024, with the most recent report developed after Intro 676 was introduced and with a deliberate eye towards many of the questions that this bill would direct TLC to address. *Electrification in Motion* analyzes data generated by the fleet of more than 10,000 EVs now performing trips and documents the rapid expansion of charging investments since the Green Rides Initiative launched. As discussed in the report, Green Rides is already having its desired effect of spurring new charging infrastructure, including more than 200 new fast-charger stalls from Tesla and Revel, a DOT fast charging site in the Bronx, and an upcoming dramatic expansion of DOT's curbside Level 2 network in neighborhoods where TLC drivers live. As documented in the report, while not an infrastructure provider, TLC has worked closely with public- and privatesector partners, including other city agencies, Con Edison, the Port Authority, and companies like Tesla and Revel. We will continue to advise them on how best to ensure that charging infrastructure keeps pace with TLC-licensed EVs, including by sharing data where appropriate, especially with other city agencies like DOT. To this end, alongside the report, we published a new interactive driver residence map that partners can use to inform their plans for new charging.



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We hope that the voluntary reports TLC has published, in addition to the EV metrics posted on our Factbook, tools like the interactive driver residence map, the analysis of EV infrastructure in our annual license review report, and the analysis of EV driver expenses in the expense report we recently commissioned address many of the concerns raised by Intro 676, but we would be happy to further discuss how TLC could be even more transparent about the EV landscape as it relates to TLC-licensed vehicles.

Lastly, Intro 1050 would prohibit TLC from requiring licensed vehicles to have personal injury protection (also known as PIP or no-fault) coverage in an amount greater than state law, effectively reducing PIP coverage from \$200,000 to \$50,000. In the late 1990s, TLC adopted insurance requirements that exceed the minimum levels set by the state as part of a broader effort to address safety in the for-hire industry. In our view, these higher no-fault limits ensure that all road users—drivers, passengers, pedestrians, and cyclists—are quickly and adequately compensated in the event of an injury-causing crash, especially when the injuries are significant or involve claims by multiple people. Additionally, we think the higher coverage is appropriate for TLC-licensed vehicles, which are largely used as full-time for-hire vehicles by professional drivers, as compared to other locations in New York and elsewhere in the U.S. where drivers are more likely to be part-time. While we understand that the intent of the bill is to lower insurance premiums for drivers and we support this goal, it is not clear that driver premiums will actually go down, as reduced coverage doesn't necessarily mean reduced premiums. In other words, we are concerned that the savings resulting from this bill may be kept by insurance companies rather than passed on to drivers, while needed coverage for road users is reduced. We welcome further discussion of this issue with the Council and stakeholders to ensure that any changes benefit drivers and all New Yorkers.

Thank you again for inviting me to provide an update on the taxi industry and offer the Administration's position on the proposed bills. We look forward to continuing to work with you to ensure that the taxi industry, and all TLC-licensed industries, can continue to provide safe, accessible, and sustainable service for New Yorkers and visitors. I am now happy to answer any questions you may have.

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To:	Testimony
Subject:	[EXTERNAL] Mon, Feb 10 2025 @ 10:00 AM - Committee on Transportation and Infrastructure
Date:	Thursday, February 13, 2025 9:16:03 PM
Attachments:	Res80-Testimony.docx.pdf

Attendee will be: Submitting written testimony

Attendee name (Zoom name): Senator Julia Salazar Attendee email (Zoom account): julia@salazarforsenate.com Attendee phone number: Hearing: Mon, Feb 10 2025 @ 10:00 AM - Committee on Transportation and Infrastructure Subject of testimony: In Support of Resolution 80 Organization: Self Organization if "Other": Accommodations: None Language Translation: Language Translation, if "Other": Country of origin, if "Creole":

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Testimony in support of Resolution 80

I am in support of Resolution 80 because it addresses three complex and interlinked issues – climate change, transportation accessibility, and poverty. The financial assistance provided by this policy change would dramatically improve the lives of my rideshare driving constituents in District 18 - many of whom are so often pushed into poverty by vehicle costs while supporting multiple generations of their families within one household. In addition to these issues with workers' rights, New York's fleet of rideshare vehicles is a major source of greenhouse gas emissions that drive climate change. In New York City alone, a fleet of 109,000 gasoline-fueled rideshare vehicles puts 1.4 million tons of CO2 into the atmosphere every year, a 62% increase from 2013 to 2018 as the FHV fleet ballooned. To protect New Yorkers today and tomorrow, we must strive toward the goals set forth by the CLCPA. Creating a surcharge for for-hire vehicles (FHVs) that would go towards funding the expansion of wheelchair accessible and all-electric FHVs will demonstrate New York State's tacit forethought and zeal for ensuring equity for all, including our future generations still to come.



Peter M. Mazer General Counsel

TESTIMONY OF PETER M. MAZER *General Counsel* METROPOLITAN TAXICAB BOARD OF TRADE CITY COUNCIL TRANSPORTATION COMMITTEE February 10, 2025

Good morning, madam Chairperson and Members of the Committee. My name is Peter Mazer, General Counsel to the Metropolitan Taxicab Board of Trade (MTBOT), a seventytwo year old association representing owners and operators of licensed medallion taxicabs. Our full service drivers' center has provided free representation to drivers leasing cabs in more than 12,000 adjudications before OATH, the Traffic Violations Bureau, and in Criminal Court.

The New York City medallion taxicab is an integral part of the City's mass transportation system. Our cabs provide door-to-door on demand transportation, serving the needs of residents and visitors, many of whom cannot access other forms of mass transit. Forty-five percent of the cabs on the road are accessible to persons with disabilities. We service areas not reachable by subway, bus or railroad. And we receive no government subsidy. Indeed, each passenger riding a cab in the central business district of Manhattan already pays \$3.75 as part of the fare directly to the MTA; that's more than the cost of a bus or subway ride.

With the increase in rideshare applications as well as the Covid pandemic in 2020, we saw taxicab ridership decline substantially from its peak of about a half million trips each day.

But expenses have increased substantially at the same time revenue has declined. Many medallion owners lost their cabs due to bankruptcies and foreclosures. Others are barely holding on. Today I want to focus on two of the areas which have impacted this industry the hardest. These are areas where the City Council can help this industry.

Cabs and other vehicles for-hire must maintain levels of both liability and no-fault insurance (a/k/a PIP benefits) that are four times higher than New York State requires for other vehicles, including out of city taxicabs and commercial vehicles. This is because of TLC regulations enacted more than twenty years ago drastically raised the insurance limits. However, these higher limits of insurance have been a magnet for fraud on the part of unscrupulous claimants, their medical providers and unethical attorneys. The fraud is so rampant that it has jeopardized the stability of the for-hire insurance industry. The high cost of insurance premiums has been devastating to the taxi industry. Recently, Uber and the major insurance carrier in the for-hire industry have filed separate lawsuits in federal court against some of these perpetrators. These suits highlight the type of fraudulent claims activity burdening for-hire vehicle insurance carriers and the scope of the problem. Lowering mandatory insurance minimum coverage limits to those applicable to other vehicles, including for hire vehicles elsewhere in the State, would discourage some of these fraudulent practices and help stabilize the for-hire insurance industry. Intro. No. 1050, under consideration today, would help achieve this result by prohibiting the TLC from mandating limits of no-fault insurance that exceed the mandatory limits set in State law. Persons injured in accidents would still be protected as the TLC and State both strictly enforce laws mandating insurance coverage. We urge the passage of Intro. No. 1050.

A second major problem facing the taxicab industry is the high cost of vehicles. As we are well aware, it is likely that automobiles, particularly WAVs, will continue to be more expensive. At the same time, the TLC is under a federal court order to take steps necessary to ensure that at least half the taxicab fleet is accessible. This means that owners must purchase or retrofit vehicles at a cost of up to \$90,000 each and must pay the added expenses of maintaining these vehicles which are equipped with heavy wheelchair lifts. The TLC provides some funding through a one dollar surcharge imposed on all taxicab rides, but this surcharge does not provide sufficient revenue. The TLC is contemplating reducing existing maintenance and repair subsidies presently provided to owners of accessible cabs, and is also contemplating the elimination of a \$1.00 per ride incentive given to drivers of accessible vehicles and other fees paid to drivers servicing persons with disabilities. We believe that these incentives need to be continued, along with the continuation of an effective accessible dispatch program currently in place, to make accessible transportation for all a reality. This will require some additional source of funds which we urge the City to find to support this important program.

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



New York Taxi Workers Alliance

AFL-CIO, Int'l. Transport Workers' Federation

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February 10, 2025

Committee on Transportation and Infrastructure New York City Council New York City Hall NYC, NY 10007

Int 1050-2024

Dear Honorable Council Members:

Greetings. The New York Taxi Workers Alliance is a membership-based organization of over 28,000 Uber, Lyft, yellow cab and green cab drivers. On behalf of our members, I write to express our opposition to Int. 1050 – a local law to eliminate the additional \$150,000 in no-fault insurance for Taxi and Limousine Commission licensed vehicles and reset the maximum for TLC vehicles to the coverage amount for all vehicles under New York State law (at present at \$50,000.) Thousands of livery drivers who currently have limited Workers Compensation coverage and yellow cab owner-drivers who have no coverage at all, would be left at risk with reduced no fault coverage; as would passengers and pedestrians. FHV and taxicab lease drivers who now are covered by Workers Comp would lose no fault coverage if Workers Comp maxes out in cases of serious injury. The so-called savings in the premium is about \$600 per year and the main touted benefit of the bill – lower coverage disincentivizing fraudulent claims – remains unsubstantiated by data. The FHV and taxi insurance market needs intervention, and the City Council is right to seek a legislative role. The proposed bill, however, will have unintended consequences on the backs of drivers.

There is no doubt that there is a significant crisis brewing in the FHV (For-hire-vehicle) and medallion taxicab industry with the possible bankruptcy of the largest carrier – representing over 60% of policies. The state would presumably take over temporarily until new carriers enter, but tens of thousands of drivers would be left in precarity, unsure if they will lose their coverage in the long run. In the immediacy, premiums are expected to increase for drivers who are already struggling to stay above minimum wage in a job with high expenses, low earnings and long hours. Governor Hochul has proposed to limit premium increases to gradual increments, permit flex rating for FHV/taxi coverage, and

allow for FHV/taxis to purchase group policies; but no long-term solutions have been announced – including policies to address fraud which many believe to be among the main reasons for the current crisis. Lowering no-fault coverage for pedestrians and passengers and leaving livery and yellow cab owner-drivers who now labor with limited or no workers compensation coverage, respectively, is not a responsible way out of this crisis. It is especially concerning if the only substantial intervention by the lawmakers is to lower coverage.

Currently, livery drivers have coverage under Workers Compensation only if the injury is a result of a crime or the injury meets the statutory definition of grave injury. Yellow cab owner-drivers (drivers who own and operate the medallion) are excluded entirely from Workers Compensation coverage. Under the proposed law, livery and yellow cab owner-drivers would be harmed, stripped of lifeline coverage. Other FHV and yellow cab lease drivers who are currently insured by Workers Compensation would have less coverage when Workers Comp maxes out. Drivers are told that the loss of coverage will be compensated for by lower premium – a sheer \$600 per year. So for a saving of \$11 per week or \$50 per month, professional drivers who average 60 hours a week behind the wheel are being asked to give up \$150,000 in coverage in case of serious injury. It's not a fair trade, it's an insult. We are further concerned that drivers who own the vehicle and carry the policy will be at personal risk in cases of serious injury to passengers or pedestrians.

The main impetus for reducing coverage through this bill seems to be the assumption that reducing coverage will reduce the filing of fraudulent claims. Proponents argue that no longer having a higher coverage threshold will take away the financial incentive of filing fraudulent crash claims and staging accidents. The problem is, there is no publicly available independent report from the state's insurance regulator, Department of Financial Services, the Taxi and Limousines Commission, or even the City Council itself to suggest this to be true. We have not seen such a report even by the insurance industry or watchdog organizations. Basing legislation on an unsubstantiated claim especially when it cuts coverage for tens of thousands of drivers is reckless.

The <u>New York Post</u> recently reported that Uber Technologies is fronting a coalition to lobby for this bill. The organizations lining up behind Uber to fight for lower coverage do not represent drivers. Given Uber's propensity to undercount driver expenses, exaggerate driver income, and viciously fight even minimum pay standards for drivers, it is hard to imagine the Council allowing Uber and its funded partners to be the voice on an issue that will have a profound and direct impact on drivers.

While Uber is extolling this bill for reducing annual premium by \$600, it is actively opposing the efforts of the TLC to adjust driver pay to reflect drivers' expenses based on an

independent study. In 2024, Uber and Lyft locked drivers out of the app, causing chaos and devastating driver incomes, all in an effort to mask all the hours drivers were working so the companies could get away with paying drivers less. Thousands of NYTWA members protested for immediate action. This Council never intervened to stop the crisis. This same Council so eager to cut coverage for drivers in case of serious injury at the behest of Uber has let languish a bill – Intro 276 - that would provide Uber and Lyft drivers critical job security. To legislate to support drivers, the Council must pass Int 276 and Int 1030 to cap the expenses of FHV drivers who rent their vehicles. Both of these bills are rooted in true economic justice for drivers. To really address the insurance crisis, the Council must take a comprehensive approach with deeper study of the conditions that lead to fraudulent claims, consequences on driver plaintiffs if the coverage is lowered and programs to support drivers with premium payments.

Respectfully Submitted,

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Bhairavi Desai, Executive Director New York Taxi Workers Alliance



Testimony of Andrew Greenblatt, Policy Director Independent Drivers Guild (IDG) Before the New York City Council Committee on Transportation and Infrastructure February 10, 2025

Good morning, Chair Brooks-Powers and members of the committee. I am Andrew Greenblatt, the Policy Director of the Independent Drivers Guild, or IDG. Thank you for this opportunity to testify regarding Intro 1050.

The IDG is a nonprofit affiliate of the International Association of Machinists and Aerospace Workers (IAM). Our organization represents over 140,000 for-hire vehicle drivers in New York State and 300,000 in Connecticut, New Jersey, Florida, and Illinois. The IAM is the only union to successfully organize black car workers in New York City and has been doing so for over twenty years.

The Personal Injury Protection (PIP) market in New York for Uber and Lyft drivers is in shambles. Insolvent companies serve 70% of the market. Rates are rocketing up faster than inflation, and the state is moving to raise them even faster. Drivers face higher rates if someone hits them or if their passenger opens a door into a bike lane. If G-d forbid that happens twice in six months, that driver will be unable to get insurance and, therefore, unable to work. Imagine if someone spilled coffee on you in the office, and you got a pay cut. Then, if someone knocked some papers off your desk a few weeks later, that's it, you're fired. That's the life of a driver under our insane "no-fault" regime. And unlike a Kafka novel, the driver doesn't even get a trial in which they may defend themselves.

New York City has decided to add to this misery by raising the minimum coverage for these accidents from \$50,000 to \$200,000. This attracts fraudsters, hucksters, and cheats, all on the backs of hard-working drivers. While this bill doesn't abolish this system, it at least gets New York City out of the business of further immiserating drivers.

We understand that certain stakeholders who have been freeloading on the backs of drivers under "no-fault" may now be held accountable for their actions. Medallion owners, for example, may find themselves held responsible for mechanical issues in their cars that cause accidents, instead of putting the burden on the drivers they rented that car to. But so be it. Those who are responsible should be held accountable.

The IDG supports this bill and thanks Council Member De La Rosa for her advocacy and urges the committee to move Intro 1050 along to full passage by the City Council quickly.







Committee on Transportation and Infrastructure New York City Council February 10, 2025

Dear members of the Committee on Transportation and Infrastructure:

My name is Anna Humphrey, and I am the Transportation Community Organizer for the Center for Independence of the Disabled, New York (CIDNY). Thank you for the opportunity to testify today on the critical issues surrounding transportation in New York City.

Int. 0193-2024: Requiring Taxis and For-Hire Vehicles to Display a Cyclist Safety Decal:

CIDNY supports this bill, which would require taxis and for-hire vehicles to display a decal warning passengers to look for cyclists before opening the door. This initiative is a simple yet powerful step towards preventing accidents and increasing awareness of the shared road space for cyclists and passengers alike. However, I urge the committee to consider the inclusion of similar safety warnings for pedestrians, including people with disabilities who may rely on visual and audible cues to safely navigate our streets. Including broader language to cover pedestrian safety would enhance the reach of this initiative and ensure greater safety for all road users.

Int. 0373-2024: Extending Scheduled Vehicle Retirement Dates for Taxicabs: This bill proposes extensions to the retirement dates for taxicabs. While we understand that owners may face financial hardship, it is essential that the City continue its efforts to phase in wheelchair-accessible vehicles (WAVs). New York City remains in need of more accessible taxis, and we cannot afford to delay these critical changes that ensure all residents, particularly those with disabilities, have equal access to transportation. I urge the committee to maintain a focus on increasing WAV availability and to create additional incentives for taxicab owners to convert their fleets to accessible vehicles, even if retirement dates are extended. Additionally, CIDNY recognizes that some of these fleets may be electronic/hybrid vehicles, and we know that a vehicle's battery life may be indicative of road miles, we encourage that vehicles should be road worthy and accessible to all patrons.

Int. 0676-2024: Study on Increasing Electric For-Hire Vehicles and Charging Infrastructure:

CIDNY supports the proposed study on increasing the use of electric for-hire vehicles and the installation of charging infrastructure. As we look to build a more sustainable and equitable transportation system, it is crucial that electric vehicle adoption includes a focus on making these vehicles accessible. We recommend that the study also considers the impact of electric vehicles on accessible transportation options for people with disabilities. Specifically, the report should assess how electric for-hire vehicles can meet the needs of passengers who require wheelchair access and other disability accommodation, as well as the challenges related to retrofitting existing vehicles and the infrastructure required to support accessible electric vehicles. We need to identify the miles for retirement for electronic batteries and how we decommission these batteries. We must recognize the possible climate impact to decommission these batteries for the electric/hybrid vehicles.

Conclusion

CIDNY urges the committee to consider these bills considering their potential impact on New Yorkers with disabilities. Safe, sustainable, and accessible transportation is vital to ensuring that everyone can fully participate in our city's economic and social life. Thank you for your time and attention to these critical issues, and we look forward to seeing the progress that will make our transportation system more equitable and efficient for all. This testimony is supported by Sharon McLennon Wier, Ph.D., MSEd., CRC, LMHC, Executive Director for CIDNY.

Thank you,

Anna Humphrey Transportation Community Organizer Center for Independence of the Disabled, New York



Memorandum in OPPOSITION

Testimony of Victoria Wickman In Opposition to NYCC Intro. 1050-2024

Victoria Wickman, President of the New York State Trial Lawyers Association, testifies as follows:

I am glad to submit this testimony on behalf of the New York State Trial Lawyers Association ("NYSTLA"). NYSTLA works to protect New York's civil justice system by fighting against initiatives that threaten to limit the rights of injured or victimized New Yorkers. NYSTLA's core mission is to promote a safer and healthier society, to assure access to the civil justice system by those who are wrongfully injured, and to advance representation of the public by ethical, well-trained lawyers.

NYSTLA is grateful for the opportunity to submit testimony in opposition to legislation that would prohibit the Taxi and Limousine Commission (TLC) from requiring the vehicles it licenses to purchase "no fault" personal injury protection in an amount greater than the amount required by state law.

No fault insurance covers medical expenses and lost wages for drivers and passengers injured in a traffic collision, regardless of fault. In 1998, the TLC adopted its current requirement that licensed vehicles purchase \$200,000 of personal injury protection, four times greater than the \$50,000 amount required for all drivers under New York State law. The reason for the \$200,000 amount was that NYC taxi drivers are professional drivers and their vehicles were being driven four times the amount (on average) than personal vehicles.

The TLC's current requirement was established in 1998 as part of a legislative and regulatory initiative to reduce taxi accidents. Despite 26 years of health care inflation, the majority of no-fault claims are for an amount *less than* \$50,000. Accordingly, this proposal does *not* target or impact systemic insurance costs, across-the-board premiums, or recent problems faced by insurers such as American Transit. Rather, this proposal targets the relative minority of *victims* who suffer catastrophic injuries from traffic accidents. The proposal aims at those who need additional insurance while reducing an incentive for Taxis and For-Hire Vehicles to operate in a safe manner.

The proposal also targets taxpayers. Lowering insurance requirements means that victims with serious injuries end up undercompensated and unable to pay for medical care that they need. These victims, lacking adequate insurance, typically seek state-funded care through Medicaid or other public programs. Undercompensated injuries must be borne by the healthcare system, taxpayers or the victims. Lowering limits doesn't make anyone safer, it just shifts the burden to injured passengers, to their families, and to taxpayers.

For these reasons, NYSTLA urges the Council to reject this proposal.

New York City Council Committee on Transportation and Infrastructure February 12, 2025

Testimony In Support of Int. No. 1050 to Reduce Additional No-Fault ("Personal Injury Protection")

Submitted by Matthew W. Daus, Esq. Transportation Technology Chair at the University Transportation Research Center of the City University of New York at The City College of New York

Greetings, Chair Brooks-Powers and esteemed members of the Transportation and Infrastructure Committee.

Thank you for convening the February 10, 2025, hearing on New York City's taxi and for-hire vehicle ("FHV") industry. My name is Matthew W. Daus, and I am here to express my support for Int. No. 1050-2024, which amends the administrative code of the City of New York related to the No-Fault/Personal Injury Protection ("PIP") insurance coverage, as mandated by the New York City Taxi and Limousine Commission ("TLC").

I testified verbally at the February 10th hearing. These comments and written testimony are intended to supplement and explain in more detail the basis for my position given the complexity of the issues. Having reviewed the comments and testimony of others at the Committee hearing as well as the recent hearing held by the TLC on similar insurance related issues, I will also address and try to clarify various misconceptions and incorrect information that was put forward by others at the hearing. I have done so in the last section of these written comments.

My Background & Historical Involvement with Additional PIP at the TLC

I have the unique distinction of being the longest-serving Commissioner and Chair of the TLC. Prior to serving as the TLC Chair, I was the General Counsel and Deputy Commissioner for Legal Affairs and Special Counsel to the TLC Chair. I served as agency counsel when the TLC promulgated the additional PIP rules at issue here. I also serve as President of the International Association of Transportation Regulators (www.iatr.global), a non-profit best practices educational organization whose members include state, local, and federal government regulators of the taxi and for-hire vehicle industries around the world (of which the TLC is a prominent longstanding member).

Finally, relevant to Int. No. 1050, I currently serve as Transportation Technology Chair at the University Transportation Research Center ("UTRC") of the City University of New York at The City College of New York (<u>www.utrc2.org</u>). The UTRC's Center for Social and Economic Mobility for People and Communities through Transportation (SEMPACT) has received over \$15 million in federal transportation research funding from the U.S. Department of Transportation, and the center is actively engaged with numerous transportation agencies in Region 2 (New York, New Jersey, Puerto Rico & the U.S. Virgin Islands) on research studies and projects that focus on mobility equity issues.

I have extensive experience with the genesis and implementation of the TLC's increased insurance coverage in 1998 and a deep understanding of the implications surrounding additional PIP coverage within our taxi and for-hire vehicle industries. I can appreciate all sides of this issue. I started my career as a

Testimony of Matthew W. Daus February 10, 2025

plaintiff's tort lawyer, and I am familiar with how claims, insurance coverage, and the system work – and how the system has failed.

Upcoming UTRC Report Addressing the NYC Insurance Crisis

The UTRC is set to publish a comprehensive report on the NYC taxi and FHV insurance crisis that recommends an array of short-term and long-term reforms to commercial insurance in the TLC's regulated industries. This study will track the history and root causes of the crisis, analyze data and input from various stakeholders, and recommend solutions that include private sector operational initiatives, regulatory incentives and mandates, and tort reform. We hope to release the final report before the New York City Council schedules a vote on Intro 1050. However, at this point, I can say that the report will recommend reducing TLC's PIP coverage to the state-mandated level to alleviate financial pressures on drivers and enhance stability in the insurance industry.

Additional PIP and the Genesis of the NYC Insurance Crisis

The taxi and FHV industry is facing an insurance crisis of skyrocketing premiums and declining competition among insurers. American Transit Insurance Company ("ATIC"), which insures two-thirds of taxi and for-hire vehicles in New York City, is now insolvent. Other insurers have been leaving this niche market for years. One of the major contributors to this crisis is the Additional PIP insurance requirement and the fraudulent and inflated claims encouraged by the TLC's \$200,000 no-fault limit. Uber¹ and ATIC² each recently filed racketeering lawsuits against hundreds of personal injury plaintiffs' law firms, medical professionals, and clinics alleging rampant fraudulent and inflated claims and systemic abuses, in large part induced by the generous additional PIP coverage.³ By eliminating TLC's additional PIP coverage, the New York City Council could help prevent fraudulent and inflated claims and help preserve New York City's taxi and FHV services.

Eliminating the mandate to obtain \$150,000 in Additional PIP coverage and returning to the statemandated levels could help alleviate the financial burdens faced by drivers and operators and foster a healthier, more competitive insurance marketplace. Many taxi and FHV drivers struggle with exorbitant insurance costs while trying to support themselves and their families. Adjusting these PIP requirements could lower these unmanageable insurance payments. As we saw from one insurance executive's written comments on the TLC's proposed amendments to its insurance rules, this action could prompt insurance companies that have left the NY market to return, which would reverse a disturbing trend in the past decade as insurers closed NY operations.

It is important note that the State law does not mandate taxi and for-hire vehicles outside of New York City to carry any Additional PIP insurance beyond the \$50,000 required of all vehicles. This PIP compensates pedestrians, passengers, occupants of other vehicles, or the TLC-licensed drivers that are involved in a collision.⁴ The \$150,000 of Additional PIP required by the TLC covers the vehicle's driver and

¹ Uber Technologies, Inc. v. Wingate, Russotti, Shapiro, Moses & Halperin, LLP et al

² American Transit Insurance Company v. All City Family Healthcare Center Inc., et. al., Case No. 24-cv-08606

³ See, Uber Alleges Fraud Scheme by NY Groups Faking Crash Injuries, Transport Topics (Jan 30 2025), available at <u>https://www.ttnews.com/articles/uber-alleges-fake-crash-ny</u>

⁴ See, 11 CRR-NY 65-1.1 Requirements for minimum benefit insurance policies for personal injuries.

Testimony of Matthew W. Daus February 10, 2025

passengers.⁵ The Additional PIP, which covers basic economic loss such as hospital and medical bills, as well as lost wages, is not available to pedestrians.

Likewise, drivers of the vehicles that carry Additional PIP are not allowed to recover from any No-Fault claim until after first filing a Worker's Compensation claim for these same type of expenses. Taxi medallion owners are required to provide Workers Compensation insurance to all taxicab drivers. The NY Black Car Fund provides extensive benefits for most for-hire vehicle drivers, and the NY Livery Fund does provide limited coverage as well. Community Car drivers who are severely injured must exhaust the Livery Fund coverage, if applicable, and then may tap into the Additional PIP.

Notably the Black Car Fun and the Livery Fund were both established AFTER the Additional No-Fault regulations were promulgated by the TLC in 1998.

Intro 1050 and the Insurance Crisis

The current TLC regulations that the passage of Int. No. 1050 would preempt were passed as part of a comprehensive series of industry reforms that TLC promulgated when I was TLC General Counsel in 1998. In addition to raising liability coverage from the state minimum to \$100,000 per person and \$300,000 per occurrence, the TLC quadrupled the PIP requirement from \$50,000 to \$200,000.

Over the past 25 years, the taxi and for-hire industry has changed dramatically, as has the commercial automobile insurance market. The passage of time has seen an increase in market entrants and competition between insurers immediately following 1998, but then, as time went on, the decline of the marketplace slowly took place - with less competition and fewer insurers offering coverage for the taxi and for-hire industry. Also, the number and size of claims has increased, along with a massive surge in fraudulent and inflated claims.

While the TLC could reduce the additional PIP through rulemaking without any legislative action by the City, it has not done so. I applaud the leadership of the New York City Council for taking up this issue, as the failure to act will compound the crisis and lead to many thousands of drivers becoming unemployed, transportation companies losing revenue, and passengers paying higher fares and suffering from significantly reduced service. It is a shame it has come to this, but the time to act is now urgent. Doing nothing, in my view, is not an option.

It will take some time for a reduction in PIP to stabilize insurance premiums or result in savings. Nonetheless, the Council needs to act now to signal to the insurance industry that there is room for competition and that the regulators and legislators are taking the crisis seriously and making changes.

It should be noted that TLC-licensed drivers tend to be among the safest on our streets because they are professionals who cannot obtain or keep their license unless they meet and maintain TLC's strict standards.⁶ The TLC's efforts to prevent crashes have been working; on a per-trip basis, the rate of injury

⁵ See, 11 CRR-NY 65-1.3 Requirements for additional personal injury protection coverage.

⁶ These requirements include:

^{*} Completing a 24-hour TLC Driver Education Course and passing an 80-question comprehensive exam on driving rules;

Testimony of Matthew W. Daus February 10, 2025

crashes involving a TLC licensed driver declined by more than one-third from 2015-2024, from 28.9 injury crashes per million trips in 2015 to 18.3 crashes per million trips in 2024.

Furthermore, tens of thousands of for-hire vehicles have telematics cameras installed, for which the drivers primarily purchased to record passenger encounters to preserve their Uber and Lyft driver ratings when there are passenger-drivers disputes. The insurance carriers, unfortunately stopped offering discounts on driver premiums for the use of these cameras, even though they provide a massive benefit in terms of reducing fraudulent claims. The TLC or the New York City Council should mandate cameras for all vehicles.

In light of the above, I urge the committee to consider the significant positive impact that Int. No. 1050 will have on our taxi and for-hire vehicle owners and the overall integrity of these services, upon which millions of New Yorkers rely. This is a cost-benefit analysis. The costs to the industry's continued existence and the welfare of passengers and drivers greatly outweigh the few valid claims that would benefit from the mandatory additional PIP coverage, which has, to date, fueled higher premiums and losses due to excessive claims and settlements by plaintiffs' lawyers and the well-documented cases of fraud.

Fact Checking of Key Points That Emerged from Testimony at the February 10th Council Hearing

A few key points emerged during the hearing that require clarification or emphasis:

- Int. No. 1050 would not prevent a vehicle owner from voluntarily obtaining additional PIP. Any
 driver interested in carrying more than the TLC-mandated minimums may do so today and will be
 able to do so if the bill is enacted. It is relatively inexpensive for any motorist to purchase
 Additional PIP coverage to protect themselves and their vehicle occupants. Some TLC-licensed
 drivers will choose to do so.
- The fact that TLC-licensed drivers log more miles or hours than other drivers is irrelevant to the additional PIP requirement. There is no correlation between vehicle miles driven by taxi and FHV drivers and the severity of crashes in which they are involved.
- Reduced premium costs may result from increased competition in the NYC taxi and FHV insurance market. Insurers that have left the market cite additional PIP as a significant reason. Reducing PIP requirements are expected to induce carriers to enter or re-enter the market (which was made

^{*} Completing a Defensive Driving Course (and a refresher every three years)

^{*} Passing a medical exam and drug test (and passing an annual drug test)

^{*} Passing a criminal background check

^{*} Passing a driving background check and resolve all outstanding moving or parking summonses.

In addition, not only are TLC-licensed drivers subject to enforcement by the New York City Police Department and safety camera enforcement, but TLC deploys its own enforcement agents to keep watch over the industry.

clear by testimony of insurers at the last TLC public hearing on unrelated insurance related regulations).

 The high level of PIP that TLC-licensed vehicles are required to maintain makes them targets for fraudsters. Private drivers, commercial drivers, and governmental vehicles do not generally carry additional PIP – or at least not at the levels required by the TLC. Only taxis and for-hire vehicles have this excessive no-fault insurance.

Thank you for your time and consideration. I sincerely appreciate the opportunity to present my views on this vital legislation and look forward to your support for this important cause. I will, of course, transmit the final study I have mentioned to the New York City Council to become a part of the official record and for your review and consideration as soon as it is complete.

I am available to answer any questions at your convenience.



DIA's in-person testimony by Jean Ryan February 10, 2025 for City Council Transportation Oversight Committee on the Status of Yellow Cabs

Hello, I am Jean Ryan, president of Disabled In Action of Metropolitan NY, DIA for short. We are an all-volunteer, grassroots nonprofit run by people with disabilities for people with disabilities. We have been around since 1970 and we often work on transportation issues because we need to get places.

DIA has been trying to get taxi access since 1996 when we founded Taxis For All Campaign. That's 29 years and we have heard every flimsy excuse in the book for why we do not have access when we are trying to hail a cab on the street, get picked up at the airport, or book a trip through an app or call. Years ago we tried to get a law for 100% taxi access with the City Council to no avail. It would not even go to committee even though a large majority of councilmembers endorsed it.

We sued and got a legally binding agreement in Federal Court more than 10 years ago that by 2020, half the cabs would be wheelchair accessible. But it is 2025 and that goal has not been reached. Last year, Judge Daniels ordered the TLC to reach 50% accessibility and the TLC changed rules about length of ownership and mandatory buying of wheelchair accessible vehicles. We believe that Intro 0373-2024 would again not allow the TLC to reach 50% in a timely manner as they legally agreed to and are under court order to reach.

Our disabilities, coupled with the fact that cab drivers need business, led the TLC to form Accessible Dispatch in 2018 so we can call or use an app to book a yellow cab trip. If the vehicle doesn't show up, we can call back and get a human! Accessible Dispatch has been a lifesaver for us and now the TLC wants to ditch it. Why? We are asking the Council for more funding to keep Accessible Dispatch and to ask the TLC why they do not enforce their own rule that drivers must pick us up! It takes only 4-5 minutes to secure us if drivers have the correct straps and knowledge. But drivers refuse to pick us up, refuse to secure us, and do not speak English so we can safely communicate with them.

Thank you,

Jean Ryan

Downstate New York



Downstate New York ADAPT Website: dnyadapt.com

February 13, 2025

Council Member Selvena N. Brooks-Powers Chair New York City Council Committee On Transportation And Infrastructure Sent Online at <u>https://council.nyc.gov/testify/</u> Emailed to: <u>testimony@council.nyc.gov</u>

Copy emailed to: Julian Martin, Policy Director at

Re: New York City Council Committee On Transportation and Infrastructure-T2025-3081 - Oversight – TLC: The Status of the Yellow Cab Industry

Dear Chair Brooks-Powers;

We, the undersigned disability organizations, submit these comments in response to the New York City Council's Committee on Transportation and Infrastructure's request for testimony with respect to the oversight hearing concerning the New York City Taxi and Limousine Commission and the status of the yellow cab industry.

New Yorkers with disabilities encounter many obstacles every day traveling around New York City. We need to have taxicabs that will pick us up, drive us safely, and in the case of those passengers who use wheelchairs, be properly secured and provided with a seatbelt and shoulder belt. Further, we need to be able to communicate with the drivers and have the drivers know that they need to come to us, assist us to the taxicab as well as help us embark and disembark. These are issues we experience daily that jeopardize our safety. These critical issues need to be addressed by the City Council's Committee On Transportation and Infrastructure.

Accessible Dispatch Program

We would like to see this Committee support a bill that would require the Taxi and Limousine Commission to continue the Accessible Dispatch Program as it presently operates with a simple structure for reaching an operator to request, in real time by telephone, a taxicab and to be able to call back and reach a real person when guidance is needed to the taxicab as well as follow up on when the taxicab will arrive and other such information. We would also like to see the Accessible Dispatch Program be expanded to include for-hire vehicles. Further, the City Council needs to provide sufficient funds to continue to pay for this very important program that works.

Taxicabs-Training and Operation

We need the schools that are training taxicab drivers to actually demonstrate how to assemble the seatbelt and shoulder belt in the class and make the drivers actually secure a person using a wheelchair and the wheelchair itself during these classes. The taxicab drivers and taxicab owners need to be taught that properly securing all passengers, including those who use wheelchairs and their wheelchairs, is not only the law but also, is to their benefit in an accident if they are sued. Passengers with disabilities who use wheelchairs should not have to request a seatbelt and shoulder belt; they should not have to teach the few drivers that actually can find these seatbelts and shoulder belts how to assembly them and place them on us. So too, passengers with disabilities sitting in seats should not have to struggle to find the head and tail to the combination seatbelt and shoulder belt. These devices need to be easy to reach in the taxicab.

Taxicab owners and drivers need to receive better training on assisting people with disabilities, which includes those with hearing loss. All taxicabs have hearing induction loops. Too often drivers seem to not know that hearing induction loops are available in taxicabs. Taxicab drivers need to realize that by providing these services they are not just promoting good customer relations, but also complying with the law. With respect to taxicabs refusing to pick up people with disabilities, especially people who use wheelchairs and other mobility devices as well who are accompanied by a service dog, the schools who train the taxicab drivers need to stress that such actions are not acceptable and are illegal in New York City.

Taxicabs should not be allowed to leave a garage without the four wheelchair securements and wheelchair ramp operational and the seatbelt and shoulder belt easily available in the taxicab.

We also urge the Council to push the Taxi and Limousine Commission to explore ways to enforce the law so that people with disabilities are not refused trips when drivers do not have the necessary equipment in their vehicles and when they do not properly assist passengers with disabilities, including education efforts and undercover actions.

Int. 0373-2024

We do not support Int. 0373-2024 because it would extend the time within which taxicabs will become at least 50% accessible under a legally binding agreement made by the City and Taxi and Limousine Commission. For any member of the City Council to propose Int. 0373-2024 and this Committee to entertain it, we see as dismissing the needs of people with disabilities as not important.

We understand that the issues the yellow cab industry is facing are serious but we did not create them and they should not be corrected by violating our civil rights. During the past few years, the Taxi and Limousine Commission, under the City Council's watch, has allowed for-hire vehicles, such as Uber and LYFT, as well as Revel for-hire vehicles that are not wheelchair accessible on the roadways of New York City and flooded the market to the detriment of the yellow cab industry. Significantly, this proposed legislation violates the agreement the City made to provide us with the bare minimum of 50% of the yellow taxicabs wheelchair accessible as well as the federal District Court's recent order that all inaccessible taxicab vehicles scheduled to be replaced now be replaced with wheelchair accessible vehicles until at least 50% of the active medallions are wheelchair accessible. As stated by people who testified at the hearing this Monday, February 10, 2025, we New Yorkers with wheelchairs have waited too long to even have 50% of the taxicabs in operation on the street wheelchair accessible. Thus, the passage of this proposed bill would send the wrong message, that is-discriminating against New Yorkers with disabilities and visitors with disabilities is acceptable and people with disabilities do not count. Please reject Int. 0373-2024. This City Council needs to provide sufficient funds to the Taxi Improvement Fund.

Additionally, we urge the New York City Council's Committee On Transportation and Infrastructure to require that all new taxicabs be wheelchair accessible vehicles until passengers who use wheelchairs have 100% access to all New York City's taxicabs. When 100% of all New York City taxicabs are wheelchair accessible everyone who needs a wheelchair accessible taxicab will be guaranteed to get a wheelchair accessible taxicab and this will allow all New Yorkers to travel easier throughout the five boroughs in New York City.

Int. 0676-2024

With respect to Int. 0676-2024, we agree with other New Yorkers with disabilities that this bill needs to be amended to also require that such a study and report include how we can have electric wheelchair accessible for-hire vehicles as well as charging infrastructure available for vehicles, including motorized wheelchairs, in New York City. Failing to require the study and report on electrical for-hire vehicles to examine and include how to fund and make such vehicles wheelchair accessible would be an inefficient and ineffective use of tax dollars. Accessibility for people with disabilities should automatically be included in any study and/or report issued by this city since accessibility leads to greater and easier use by all New Yorkers and makes New York City more attractive to visitors and businesses. Studies that we, taxpayers with disabilities, fund through our tax dollars need to consider our needs. The needs of people with disabilities should never be an afterthought or worse yet, not considered at all.

Resolution 0080-2024

We submit that Resolution 0080-2024 needs to be changed from funding for the expansion of wheelchair accessible and all electric for-hire vehicles to funding for the expansion of wheelchair accessible for-hire electric vehicles. We would like to see that all future for-hire vehicles that are electric also be accessible. This just makes economic sense.

Finally, we agree with the testimony given in person by Jean Ryan, Michael Ring, Julia Yepez, Eman Rimawi-Doster, Robert Acevedo and Kathleen Collins as well as the written testimonies submitted to this Committee by Anna Humphrey on behalf of the Center for Independence of the Disabled, New York and by Jean Ryan on behalf of Disabled In Action of Metropolitan, New York, Inc. and Kathleen Collins.

Thank you for the opportunity to comment since equal access to all New York City's services, activities and programs is important to all New Yorkers. If you would like additional information or have any questions, please do not hesitate to contact the organizations listed below. Finally, thank you for your continued work on behalf of all of us.

Sincerely,

Anne-Elizabeth Straub, Marilyn Tucci, Brandon Heinrich and Michael Ring Co-Coordinators Transportation Equity Working Group Downstate New York ADAPT

Bronx Independent Living Services, Inc.

Manuel Perez, Executive Director, Email address: manuel@bils.org

Brooklyn Center for Independence of the Disabled

Joseph Rappaport Executive Director Email address: jrappaport@bcid.org

Center for Independence of the Disabled, New York

Dr. Sharon McLennon Wier, Ph.D., MSEd., CRC, LMHC Executive Director Email address: <u>smclennonwier@cidny.orq</u>

8

Civics League for Disability Rights

Anne-Elizabeth Straub Representative for Civics League for Disability Rights Email address: <u>civicsleague@gmail.com</u>

Disabled In Action of Metropolitan New York, Inc.

Jean Ryan President Email address: <u>pansies007@gmail.com</u>

Greater New York Council of the Blind of the American Council of the Blind of New York State

Terence B. Page President Email address: <u>terencebpage@gmail.com</u>

Harlem Independent Living Center, Inc.

Yasmin Campbell Systems Advocate Email address: ycampbell@hilc.org

Hearing Loss Association of America, New York City Chapter

Katherine Bouton President Email address: <u>katherinebouton@hearinglossnyc.org</u>

National Federation of the Blind, Vanguard Chapter of Greater New York

Carlos Torres Vice President Email address: ct91987@gmail.com

One Heart, One Vision

Rasheta Bunting President Email address: <u>rasheta@oneheartonevision.org</u>

Self-Initiated Living Options, Inc.

Joseph Delgado Chief Executive Officer Email address: jdelgado@siloinc.org

Staten Island Center for Independent Living, Inc.

Reginald Rosarion Executive Director Email address: rrosarion@siciliving.org



Testimony of Alia Soomro, Deputy Director for New York City Policy New York League of Conservation Voters City Council Committee on Transportation and Infrastructure Oversight Hearing on TLC: The Status of the Yellow Cab Industry February 10, 2025

My name is Alia Soomro and I am the Deputy Director for New York City Policy at the New York League of Conservation Voters (NYLCV). NYLCV is a statewide environmental advocacy organization representing over 30,000 members in New York City. Thank you, Chair Brooks-Powers and members of the Committee on Transportation and Infrastructure for the opportunity to comment.

According to the <u>New York City Comptroller's Climate Dashboard</u>, New York City's transportation sector is the second highest source of NYC's greenhouse gas emissions (GHG). In order to reduce our GHG emissions, air pollution, and congestion, we must improve public transit and reduce the number of automobiles on our roads. However, for the vehicles that must remain, such as for-hire vehicles, a critical part of our fight is transitioning from fossil fuel powered vehicles to zero emission vehicles. According to the Taxi and Limousine Commission (TLC) <u>estimates</u>, TLC-licensed vehicles account for four percent of the City's transportation emissions.

NYLCV supported the Adams' Administration's Green Rides Initiative, which requires New York City's rideshare trips to be conducted by either zero-emission or wheelchair-accessible vehicles by 2030, setting yearly benchmarks designed to ensure a smooth and efficient transition to a cleaner, more accessible fleet. Beginning in 2024, 5% of all high-volume (Uber & Lyft) trips will need to be through vehicles that are either zero-emission or wheelchair accessible. The benchmark will then rise to 15% in 2025 and 25% in 2026. In 2027 it will increase to 40%, then rise yearly by 20 percentage points until the end of the decade, when 100% of all rides will be under the guidelines. According to TLC, as of August 2024, almost 20% of high-volume trips were conducted in either an electric vehicle or WAV, far exceeding the year's target of 5%

Switching to zero emission vehicles will also require the City to work with the State and utilities to roll out more charging infrastructure for for-hire vehicles. NYLCV supports Intro 676 of 2024, sponsored by Council Member Farías, requiring TLC to conduct a study on the costs, challenges, and opportunities related to increasing the use of electric for-hire vehicles and installing new charging infrastructure and to report on the findings of the study, including recommendations for incentive programs to encourage the use of electric for-hire vehicles and recommended locations for new electric vehicle charging stations. The bill would also require

the TLC to set targets for issuance of licenses to electric vehicles and installation of charging infrastructure and report twice a year on progress towards those targets.

We recommend that the bill add language requiring the report to include recommendations for increasing charging infrastructure in Disadvantaged Communities (DACs). For instance, <u>according to TLC</u>, charging gaps remain in the Bronx and many zip codes with a high proportion of TLC-licensed drivers often have a DAC designation. Many new infrastructure incentive programs are designed to channel investment toward DACs such as NYSERDA's Charge Ready NY 2.0 and Con Edison's PowerReady Light-Duty Vehicle Program.

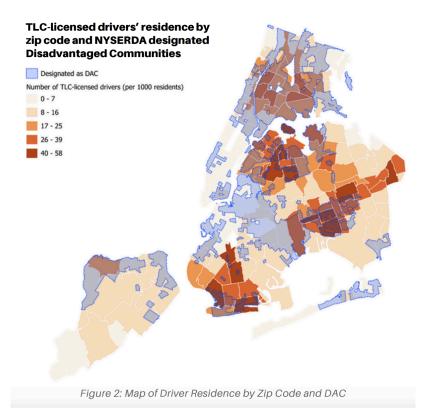


Image from TLC's report *Electrification in Motion*

We encourage TLC to continue working with for-hire vehicle companies, charging infrastructure companies, utilities, vehicle manufacturers, partner city and state agencies and other stakeholders to ensure that the transition to zero emission vehicles is successful. This also includes transitioning to electric wheelchair accessible vehicles in the future.

Thank you for the opportunity to comment.

Int 1050 - 2024 Limiting the amount of liability coverage that the taxi and <u>limousine commission may require for vehicles it licenses.</u>

Testimony by the Livery Roundtable

Date: 2/11/2025

Honorable Council Members,

My name is Avik Kabessa, I am the CEO of Carmel, and a board member of the Livery Roundtable (LRT). Carmel was formed over 40 years ago as a community car service, serving areas not served by yellow taxis. The LRT is a trade association representing about NYC 240 livery bases.

Carmel and the LRT strongly oppose Int 1050. The elimination of the Additional Personal Injury Protection (APIP) would lead to multiple unintended consequences negatively impacting the for-hire livery sector. Additionally, there have been numerous testimonies provided which misrepresent the implications of this proposed legislation. I will outline some of these misrepresentations to provide the Committee with a better understanding of our sector and why we so strongly oppose this legislation.

First and foremost, it should be noted that not one insurance carrier testified that the elimination of APIP will significantly reduce the cost of the for-hire insurance premium. As a matter of fact, from conversation we held with for-hire insurance carriers, not one of them was able to assess the reduction in premium by more than 2%-3%. In other words, passing Int 1050 may 'save' about \$200-\$300 off the for-hire insurance premium. Saving \$200-\$300 will not save the for-hire insurance issues, yet the elimination of the added protection will place the for-hire industry in much dire situation than it is currently in.

Second, the claim that the Black Car Fund is somehow an alternative to the APIP is false. The Black Car Fund is a Workers Compensation Fund, not an injury fund. Thus, The Black Car Fund is not an alternative to APIP.

Third, the claim that the \$100K liability coverage is somehow an alternative to APIP is also false. Liability coverage, as its' name suggests, protects the driver against being sued by a **third party**, but <u>it does not</u> <u>provide the driver with access to this money for medical treatment or lose wage benefits</u>. Claiming otherwise is to mislead the committee into believing that liability is a replacement for APIP.

Fourth, as stated by Commissioner Do, in contrast to a not-for-hire driver, for-hire drivers log many more miles than a regular not-for-hire driver, and the for-hire driver transports passengers that are not known to the driver. These two differentiating factors expose the for-hire driver to a higher risk of injuries from accidents, in addition to injuries due to crime. Thus, proposing insurance held by the average driver as suitable for the for-hire driver, (PIP at a personal vehicle level) makes no sense and is harmful to the for-hire driver. Higher risk requires higher coverage.

Fifth, the additional cost of the APIP is in direct correlation to the increased risks associated with benefits being paid. Notwithstanding the inability of those testifying to provide this Committee with a percentage of claims which exceed the \$50K basic PIP threshold, the insurance companies have this data and have priced the premium for APIP proportionally. To this point, in the insurance world a driver/passenger is precluded from purchasing \$150,000 in additional protection, as a personal benefit, which is paid in a short timetable at an annual premium of \$500.

We believe the committee should never eliminate a good thing just because some people are using it improperly. While the Committee should examine cases of fraud, the argument that the City Council should adopt Int 1050 to ward off fraud is both ridiculous and harmful to the larger for-hire transportation community. It is akin to eliminating vehicles on the road because some terrorists use vehicles to kill people. Good public policy dictates the maintenance of APIP while the appropriate agencies work to fight fraud. Towards this effort, the LRT is working closely with the State Department of Financial Services on ways to fight for-hire insurance

fraud. And, to that effect, the LRT will be glad to work with this committee on passing laws more precisely targeting fraud.

Finally, paying less for insurance is always nice. However, the cheap becomes very expensive once an accident takes place. There is a saying, "if you want to know the road ahead, ask the people coming back" which applies in this instance. Carmel was in operation years before the APIP was enacted. We saw the benefits it has brought to our industry. Prior to enacting APIP, drivers and passengers involved in accidents were unable to access the benefits when they needed it most. Many of them were forced to use their own personal medical insurance and faced horrible financial difficulties because of paying high deductibles and increasing rates. Some had to settle for less treatment and/or less physical therapy, dooming them to lifelong disabilities. And, in many cases passengers sued drivers for the benefits which the driver had to defend and/or pay out of pocket. That is why APIP was created and that is why it should remain.

For all the reasons listed above, Carmel and the Livery Roundtable urges the Committee to reject Int 1050.

The LRT and I stand ready to answer any questions you have on this issue.

Thank you, Dr. Avik Kabessa (917) 558-3382 Livery Roundtable – Founding member Carmel - CEO

February 10, 2025 NYC Council Transportation and Infrastructure Committee Written Testimony of Lyft Inc. Support of <u>Int No. 1050</u>

Committee on Transportation and Infrastructure New York City Council

Dear Chair Brooks-Powers and Members of the Committee,

Thank you for the opportunity to submit written testimony regarding the urgent need to lower the Personal Injury Protection (PIP) insurance requirements for TLC-licensed vehicles in New York City. I would also like to express my gratitude to Council Member Carmen De La Rosa for her leadership in sponsoring this critical legislation.

Currently, TLC vehicles are required to carry \$200,000 in PIP coverage—four times the amount required for Transportation Network Company (TNC) drivers and personal car drivers throughout New York State. This excessive requirement places an undue financial burden on for-hire vehicle (FHV) vehicle owners and drivers, making it increasingly difficult for them to afford the necessary insurance to operate. Thus, this cost is pushed to riders, increasing the rider fares which are already the highest in the country.

Lowering the PIP requirement from \$200,000 to \$50,000 would align TLC coverage with that of TNC drivers and personal vehicles, reducing costs for drivers while maintaining sufficient protection. Additionally, this adjustment would:

- Reduce Duplicative Coverage Costs FHV drivers in New York already receive benefits largely duplicative of PIP through the Black Car Fund. Maintaining an unnecessarily high PIP requirement results in redundant and costly coverage.
- Combat Insurance Fraud The high no-fault limits incentivize fraudulent claims, which drive up costs for insurers and, in turn, for vehicle owners and drivers. Lowering the limits would help mitigate the opportunity for abuse.
- 3. Encourage Market Competition The diminishing availability of commercial auto insurance in NYC poses a growing risk to the industry. Excessive insurance requirements discourage new carriers from entering the market, reducing competition and further increasing costs. A reduction in PIP requirements would help stabilize the market and create more affordable insurance options for vehicle owners and drivers.

The current state of commercial auto insurance in New York City creates significant challenges for FHV services, including Uber, Lyft and livery vehicles. While no single policy change will fully

resolve these challenges, lowering PIP requirements is a necessary step toward a more equitable, affordable, and sustainable insurance system.

I urge the City Council to support this important reform to bring much-needed relief to TLC-licensed vehicle owners drivers. Thank you for your time and consideration. Please do not hesitate to reach out should you require any further information.

Sincerely,

Geoff Berman Public Policy Director Lyft, Inc.

BEFORE THE NEW YORK CITY COUNCIL COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE

Request for comment: Int. 1050-2024

Public Hearing: February 10, 2025

COMMENTS OF UBER USA, LLC

Freddi Goldstein 3 World Trade Center 175 Greenwich St., Fl. 47 New York, NY 10007 Email: freddi@uber.com

Uber Technologies, Inc. appreciates the opportunity to submit this Comment in support of Int. 1050-2024 to the Committee on Transportation and Infrastructure.

Int. 1050 would reduce Personal Injury Protection coverage requirements for New York City for-hire vehicle drivers from \$200,000 to \$50,000. The proposed limit of \$50,000 per person matches the requirement of the New York State Department of Financial Services (DFS) and was the requirement of NYC FHV drivers until 1998 when the Taxi and Limousine Commission promulgated a rule requiring their drivers to carry four times more coverage than any other driver on the road. As a result, TLC licensed drivers face an undue and unnecessary cost burden, there is evidence of rampant fraud incentivized by the high no-fault limits, and new insurance carriers are reluctant to offer commercial coverage in the New York City market.

Undue and unnecessary cost burden

Unlike in the rest of the state, peer-to-peer rideshare is not permitted in New York City. Only traditional livery services are allowed, and livery drivers are responsible for maintaining their own commercial auto insurance. NYC auto insurance premiums are increasing, yet often inaccurately priced and still artificially low. Certain insurance carriers have been charging drivers less than they should, resulting in carriers' inability to pay claims properly, while other carriers have left¹ the market. Only a small number of carriers provide coverage in New York

¹https://www.insurancebusinessmag.com/us/news/breaking-news/adirondack-insurance-exchange-exits-from-ny-market-499518.aspx

City, and the largest of those carriers $(ATIC^2)$ is in danger of going out of business - putting at risk the livelihoods of over 60% of NYC for-hire vehicle drivers.

Since 2024, drivers insured by American Transit have seen at least a 20% increase in rates, while drivers insured by Hereford have seen about a 10% increase. This is just the start of many increases to come, as Governor Hochul's budget spelled out a plan for a multi-year process to reach rate adequacy. The additional PIP requirement contributes to this high cost for drivers. If Int. 1050 were to pass, it's estimated that drivers would save around \$600/year.

Uber and Lyft drivers are typically covered by the Black Car Fund, which is largely duplicative of PIP and pays out before PIP. Since the BCF pays out first,³ drivers have even less need for PIP than other New York drivers.

Rampant fraud

The current high PIP requirement creates an incentive for fraud and abuse as bad actors in the claims process drive up the costs of payouts through lawsuits to hit the \$200,000 limit. According to a <u>report</u> released by DFS, suspected no-fault fraud reports accounted for 75% of all fraud reports the department received in 2023. New York reported 1,729 staged crashes in 2023—an increase of 14% from 2022 and 34% from 2021—making it the second-highest state for such incidents. The rise in these scams is directly contributing to higher auto insurance premiums, inflating costs by an estimated \$100 to \$300 per year for New York drivers.⁴

Reducing the elevated New York City PIP requirement removes incentives for frivolous, costly lawsuits, and will help stem the tide of increasing costs and unaffordability for New Yorkers.

Attracting entrants into the market

There is no question New York City needs additional insurers in order to ensure stability for riders and drivers. There are fewer than a handful of insurance providers locally and late last year, the largest of them, American Transit Insurance Company, announced that they are \$700 million insolvent - sending the industry into a pending crisis.

As we have heard from several large insurers we work with elsewhere, the current high PIP requirement in New York City is a deterrent for entering the market.

While there are other steps that must be taken to improve the current insurance landscape, reducing the Personal Injury Protection coverage requirement is the only one that falls under the purview of the New York City Council. On behalf of tens of thousands of drivers and millions of

² https://www.insurancejournal.com/news/east/2024/09/04/791291.htm

³ N.Y. Ins. Law § 5102, N.Y. Comp. Codes R. & Regs. tit. 11, § 65-3.16, Measurement of No-Fault Benefits, Am. Transit Ins. Co. v. N. Shore Fam. Chiropractic PC, 184 N.Y.S.3d 592 (N.Y. Sup. Ct. 2023)

⁴ https://dmv.ny.gov/news/with-staged-car-crashes-on-the-rise-dmv-encourages-defensive-driving

riders, we respectfully request that you take this action to protect New York City's vibrant rideshare community.



February 10, 2025 Committee on Transportation and Infrastructure Re: **Int. 0676-2024** Study on increasing electric for-hire vehicles

Greetings Members of the Committee and staff,

Electrify America appreciates the opportunity to submit testimony highlighting the importance of proliferating fast charging infrastructure in New York City. Electrify America is one of the largest providers of Direct Current Fast Chargers (DCFC) in the U.S. and is investing \$2 billion over 10 years in EV charging infrastructure to enable millions of Americans to drive electric. The network has grown to include over 4,000 chargers across 900 stations nationwide. And in New York City, Electrify America has 16 chargers across 3 stations with more underway.

To meet the objectives of the Green Rides initiative and the electrification goals noted in Int. 0676-2024, increasing the number of hyper-fast chargers in the city is a must. About 200 direct current charging stations exist in New York City but few of them have the capacity or provide the charging speeds necessary to meaningfully advance the electrification rideshare fleets. For context, the National Electric Vehicle Infrastructure (NEVI) investment plan—having become the industry standard—requires that stations be capable of charging at least four vehicles at once and provide each with charging speeds of at least 150 kilowatts simultaneously. 150 kilowatts provide about 7 miles of range per minute meaning that a significant amount of range can be acquired in just 10 to 20 minutes. Few stations in New York City meet those standards—they are either too small or too slow—and most of those that do are Electrify America's.

The proliferation of charging stations offering fast charging speeds is uniquely critical for electrifying rideshare vehicles because drivers, for whom time is money, cannot afford to spend over an hour



charging their vehicle. Therefore, as the Committee explores creative and innovative ways to catalyze the electrification of for-hire vehicles, Electrify America encourages members to prioritize programs and policies that support investment in not just EV charging infrastructure but charging infrastructure that meets the unique needs of the rideshare drivers conducting their business in an electric vehicle.

Respectfully submitted,

/s/ Anthony Willingham Government Affairs & Public Policy Lead—State Electrify America, LLC 1950 Opportunity Way, Reston, VA 20190 anthony.willingham@electrifyamerica.com



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February 7, 2025

Re: Intro 1050-2024

Committee on Transportation & Infrastructure New York City Council New York City Hall City Hall Park New York, NY 10007

Honorable Council Members:

I write in opposition to Intro 1050-2024, which would reduce the mandatory No-Fault (also known as Personal Injury Protection or PIP) coverage for forhire vehicles (FHVs) from \$200,000 to \$50,000. The proposed legislation fails to properly appreciate the interplay between workers' compensation and No-Fault coverage, and would leave pedestrians and passengers in for-hire vehicles without adequate recourse for medical expenses and lost wages due to injuries suffered in motor vehicle accidents.

My view on this matter is informed by my experience as a practicing attorney for almost 35 years, in the course of which I have represented thousands of injured workers before the New York State Workers' Compensation Board as well as hundreds of individuals who were injured in motor vehicle accidents. My clients have included FHV drivers as well as passengers, pedestrians, and other motorists.

No-Fault benefits cover "basic economic loss," which is defined as (a) 80% of lost wages up to \$2,000 per month for up to 3 years post-accident; and (b) medical expenses up to (c) a unitary cap of \$50,000 (or in the case of FHVs, \$200,000).

Thus, if a non-FHV driver is seriously injured in a motor vehicle accident and spends a week in the hospital incurring \$50,000 of medical bills, then no wage loss benefits are payable because the \$50,000 cap has been reached.



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Conversely, if a non-FHV driver has 3 years of lost wages at \$2,000 per month (\$36,000) and \$10,000 in medical expenses, then they still have \$4,000 left on the \$50,000 which can only be used for medical expenses because lost wages stops a 3 years but medical continues.

This coverage also extends to passengers in an FHV and pedestrians.

In the case of FHVs, medallion taxi and black car drivers who are injured while in the course of their employment are covered by workers' compensation. By contrast, medallion owner/operators and livery drivers are covered instead by No-Fault (although livery drivers can access workers' compensation coverage if (and only if) the injury is the result of a crime or qualifies as a grave injury defined by the statute).

Thus, the additional No-Fault coverage currently required by the Taxi & Limousine Commission (TLC) primarily provides protection for passengers, pedestrians, and livery cab drivers.

I understand that the proponents of Intro 1050-2024 have advanced the argument that the additional No-Fault coverage is unnecessary because FHV drivers are already covered by workers' compensation. As noted above, the beneficiaries of the current rule are overwhelmingly passengers and pedestrians, not FHV drivers and this argument is therefore largely misplaced.

It is true that the additional No-Fault coverage provides some benefit to medallion taxi and black car drivers because workers' compensation wage loss benefits are limited to two-thirds of the pre-accident wage, whereas No-Fault covers 80% of the pre-accident wage.

I also question the cost argument that has been advanced. Review of a recent policy issued by American Transit Insurance Company (ATIC) showed that the premium charge for \$50,000 in No Fault coverage was \$606 (\$121.20 per \$10,000) while the premium charge for the remaining \$150,000 in No Fault coverage was \$389 (\$25.33 per \$10,000). In other words, the additional \$150,000 in coverage that is currently required is provided at about one-fifth the cost of basic \$50,000 coverage.



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TLC licenses approximately 130,000 FHVs in New York City. Intro 1050-2024 would potentially reduce insurance premiums on each of those vehicles by about \$400 per year or \$52 million. To the best of my knowledge, insurers have not provided any data about the amount of No-Fault expenses that are paid as a result of claims that fall between \$50,000 and \$150,000. It is entirely possible that those claim costs are less than \$52 million and that – rather than helping the insurance industry as is apparently intended – eliminating additional No-Fault coverage would have a negative impact on insurer profit margins.

For example, if claim costs associated with No-Fault claims that fall between \$50,000 and \$150,000 are \$40 million annually, then the \$52 million in premium collected to provide that coverage would represent a 20% underwriting profit (to which investment income would have to be added). Conversely, if claim costs associated with the additional coverage are \$60 million annually, then when investment income is included providing the coverage has no net cost to the insurer.

What is certain, however, is that the enactment of Intro 1050-2024 would be a two-thirds reduction in available insurance coverage for FHV passengers, pedestrians, and livery drivers in New York City who can ill afford the loss of benefits. In many cases this will result in the transfer of costs to other public benefit systems, and thus require the City to subsidize the insurance industry's failure to provide adequate coverage for vehicular accidents.

I therefore respectfully submit that the City Council should decline to enact Intro 1050-2024.

Very truly yours,

Robert E. Grey



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February 10, 2025 Re: SUPPLEMENTAL TESTIMONY Intro 1050

Committee on Transportation & Infrastructure New York City Council New York City Hall City Hall Park New York, NY 10007

Honorable Council Members:

I submit this letter as a supplement to my prior written testimony of February 7, 2025.

It is important that the Council proceed from the correct legal framework in evaluating this bill.

As outlined in my letter of February 7, medallion drivers and black car drivers are generally covered by workers' compensation, not No-Fault. However, livery drivers, medallion owner/operators, passengers, pedestrians and bicyclists are all covered by No-Fault. Witnesses who testified that they are not were mistaken.

In addition, the idea advanced by some witnesses that liability insurance is a substitute for No-Fault coverage is equally incorrect. The availability of liability insurance (a) depends fault; (b) frequently take years to access; and (c) is ADDITIONAL TO and not a substitute for No-Fault coverage. In short, in the circumstances to which it applies, No-Fault is the sole meaningful source of wage replacement and medical expenses for individuals other than medallion and black car drivers who are injured in vehicular accidents.

As I stated in oral testimony, the Taxi & Limousine Commission is correct that (a) for-hire vehicles should carry more coverage than others because



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they are being operated on a full-time (in some cases 24-hour) basis as opposed to commuter transportation. It is also to be expected that congestion pricing will increase the use of medallion taxis and FHVs, reinforcing the need for adequate financial security.

With regard to American Transit, it should be self-evident that its financial woes are of its own making – no other automotive insurer faces the same situation and as outlined in my letter of February 7, the excess No-Fault coverage required by the TLC has not added to ATIC's insolvency and may actually be an asset to it. ATIC has not provided claims data concerning premium and investment income related to the excess No-Fault endorsement as compared to losses associated with that coverage.

The anecdotal testimony of several witnesses concerning the question of fraud in No-Fault coverage is both unsupported by any factual data and contrary to common sense and empirical experience.

No-Fault claims are not a lawsuit in which attorneys are involved. They are an insurance claim for lost wages and medical expenses from the policyholder or other individual injured by the use and operation of a motor vehicle. The insurer must receive notice of the claim within 30 days.

As a practical matter, only the most serious and life-threatening injuries will generate medical expenses in excess of \$50,000. Needless to say, these are not the type of injuries that are susceptible to fraudulent claims. To the extent that fraudulent No-Fault claims exist, they are primarily the result of a small number of disreputable medical offices seeking to maximize billing for physical therapy and diagnostic tests before the insurer issues a denial.

It is unheard-of for such claims to exceed the \$50,000 limit, and the advocates for Intro 1050 have offered no data concerning the extent to which the additional coverage is accessed or the types of injury to which it has been applied. The assertion that the enhanced No-Fault coverage provides a "magnet for fraud" is simply absurd. To the contrary, the



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coverage provides protection for the most seriously injured individuals in vehicular accidents.

As noted in my February 7 letter, a review of a recent ATIC policy showed that the cost of the supplemental No-Fault coverage was about \$400. Some witnesses testified that it is \$600, which we believe is in fact the cost of the base \$50,000 coverage. However, even assuming the \$600 figure, the cost of the additional coverage is \$11.53 per week, or \$1.64 per day.

There is simply no justification to deprive injured New Yorkers – whether they are passengers, livery drivers, medallion owner/operators, bicyclists or pedestrians – of adequate coverage for lost wages and medical treatment for \$1.64 per day. It should certainly not be done in the name of the solvency of American Transit, because (1) it will not achieve that goal or make a significant impact upon it (and may actually have the contrary result); and (2) American Transit's insolvency is a matter of its own creation and the cost should not be transferred to the injured victims of vehicular accidents.

Very truly yours,

Robert E. Grey

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February 13, 2025

Hon. Selvena N. Brooks-Powers Chair of Committee on Transportation and Infrastructure New York City Council 250 Broadway, Suite 1865 New York, NY 10007

> Re: Written Testimony Int 1050-2024

Dear Chairperson, Selvena N. Brooks-Powers:

I am counsel to the New York Independent Livery Driver Benefit Fund ("NYILDBF," "Livery Fund," or "the "Fund"). The NYILDBF opposes Int 1050-2024 for the following reasons.

By way of history, Chapter 392 of the Laws of 2008 created the New York Independent Livery Driver Benefit Fund. On July 25, 2008, New York Governor David Paterson signed legislation that created the Livery Fund. The intent and purpose of creating the NYILDBF was to solve the decades-old dilemma of whether a livery driver should be entitled to any monetary and medical benefits if injured while on a dispatched job. The NYILDBF became effective as of January 1, 2010.

Before the creation of the Livery Fund, all livery drivers were covered for no-fault benefits under Article 51 of the New York Insurance Law. However, no-fault benefits were available to the livery driver only after years of court hearings to determine if the driver is entitled to benefits through no-fault or should the driver's "employer" (the vehicle owner or the dispatching base) be responsible for these benefits. The trade-off with the NYILDBF was to set up a mechanism for the independent livery driver to receive workers' compensation benefits under certain well-defined circumstances. The best line of demarcation between eligibility and ineligibility for workers' compensation benefits was based on the nature of the injuries sustained by the independent livery driver. To prevent the No-Fault insurance industry from creating a dramatic increase in the cost of such insurance, it was determined that the NYILDBF would cover the most severe types of injuries and the independent livery driver who sustained less severe injuries would receive no-fault benefits. The nature of the injuries that would enable the independent livery driver to qualify to obtain full workers' compensation benefits has now been codified in Executive Law Section 160ddd. In 2022, the Livery Fund's responsibility was extended to also provide benefits to Black Car drivers performing trips dispatched to them by a Livery base.

The Livery Fund has operated as intended and has continued to serve its helpful purpose for the past fifteen years. Drivers knowingly pay the higher cost for Additional Personal Injury Protection ("APIP") because it benefits them when they sustain a non-catastrophic injury while working. Reducing the \$200,000 No-Fault requirement to \$50,000 will virtually eliminate 75% of the benefits afforded to drivers and will, thus, destroy the positive effects of the Livery Fund. Such action also runs contrary to the intent and purposes of the NYS legislature in the creation of Article 6G of the Executive Law (the Livery Fund law). Lowering the New York City Taxi and Limousine Commission ("TLC") mandated PIP coverage from \$200,000 to \$50,000 is a band-aid at best, and not a long-term solution to the problems facing the NYC for-hire vehicle ("FHV") insurance market.

While such a change would bring PIP insurance requirements in line with levels mandated for personal vehicles in the rest of the state, the premium associated with APIP (that amount above the mandatory \$50K of PIP coverage) is less than 9% of the cost of the policy. Lowering the PIP limits by 75% will not reduce the cost of the policy by a significant level, especially considering that the cost of bodily injury and basic PIP is already at artificially low levels.

Passing Int 1050-2024 may prove to be a public relations nightmare when pedestrians and passengers are injured and subsequently find out that the coverage they are accustomed to is 75% less than it was in the past 25 years. In other words, lowering the PIP limits by 75% may lead to a slight reduction in the cost of a driver's policy, it will come at the expense of the riding public that has come to expect PIP coverage that is greater than the state-mandated minimum. The perception will be that passing Int 1050-2024 was done to serve Uber and Lyft rather than protect the riding public. Sometimes, perception equals reality.

Lowering insurance limits will also cause unanticipated adverse side-effects. For example, the New York City Transit Authority ("NYCTA") utilizes for-hire vehicles ("FHVs") as part of their Access-A-Ride Program ("AAR Program") to provide transportation to people with disabilities. NYCTA typically seeks higher insurance limits for the vehicles utilized in the AAR Program but has accepted the current limits as an exception, because of the APIP. NYCTA will not accept PIP limits at the state-mandated minimum, especially since disabled persons are being transported via the AAR Program. FHV drivers will be adversely affected if PIP limits are lowered, as many rely upon AAR Program work to supplement their income from dispatches and street hails

Next, the New York State Department of Health and Medicaid ("DOH") pays for nonemergency medical transportation ("NEMT") for Medicaid members so they can get to and from their medical appointments at no cost to them. MAS, the entity that acts as a broker for DOH, accepts current FHV insurance limits, but will not be willing to allow FHVs to transport Medicaid participants if PIP limits are reduced by 75%. Typically, the state-mandated minimum coverage is not acceptable to MAS. A loss of NEMT work would be a severe detriment to many FHV owner/operators, some of which solely rely upon NEMT work to stay in business.

Next, businesses that utilize FHVs to transport high-level executives and high-net-worth individuals expect higher levels of insurance coverage (or, at the very least, for such limits to not be reduced solely as a means for FHV owners to retain more of their earnings). Moreover, airlines and hospitality groups are a valuable source of business for FHV bases and, by virtue thereof, are

likewise valuable to FHV owner/operators. Those airlines and hospitality groups expect their customers to be transported in FHVs with insurance limits that are above the state-mandated minimum.

Also, PIP costs are not due to high level if medical utilization. The reason for the increasing cost of PIP and APIP is not because of the price for the high level of medical utilization of no-fault medical benefits, but due to the nature of the very litigious no-fault system and the artificial rise in litigation costs associated with the no-fault system, also known as loss-adjusted expenses ("LAE").

While no-fault fraud will always be an essential issue to face and combat, it is not a new issue, nor is it the overriding reason why PIP costs and losses are so high. PIP costs have been higher in the past 5-7 years because companies like American Transit Insurance Company ("ATIC") spend more to fight certain aspects of a no-fault claim than the overall claim is worth. In other words, the spending on LAEs in defending certain aspects of PIP claims is often more than the cost of the claim. For example, ATIC spends \$5,000 to defend the denial of a claim for a diagnostic test that totals \$3,000. Artificially high LAE expenses lead to artificially increased cost of APIP

Next, the effect on the cost of private health insurance must be considered. If the PIP limits were lowered from \$200,000 to \$50,000, then this would have an immediate impact on those with private health insurance, as well as Medicare and Medicaid. No-fault insurance (PIP) is always the primary payer for medical care resulting from car accidents. One's private health insurance only becomes responsible once the no-fault benefits are used up.

This means that drivers, pedestrians and passengers who need no-fault benefits over \$50,000, will have their limits exhausted much earlier and one's regular health insurance will kick in along with the applicable deductibles, coinsurance and copays for treatment related to the accident will apply. This may also result in a higher cost of private health insurance.

With private health coverage, there is a limit on medical provider choice. If you exhaust your PIP benefits and must rely upon coverage from your private medical insurance, your choice of medical care providers becomes limited, typically to only seeing the doctors in your network. On the other hand, PIP does not have network restrictions. Usually, PIP covers medical bills as long as the treatment is deemed medically necessary.

A private health insurance carrier who pays for medical care after NF benefits are exchanged can file a subrogation claim against any proceeds the injured party may receive from a car accident settlement or jury verdict. Therefore, if an injured person uses their private health insurance for medical care after their PIP benefits are exhausted, their monetary recovery for bodily injury is reduced by the requirement to reimburse your health insurance provider for all monies paid. All of the above places those who need a higher level of no-fault benefits in a much worse position with lower PIP limits.

In the end, it is the members of the public that want, need and are entitled to be comfortable and feel safe that when they are passengers in a for-hire vehicle, they know that the person operating that vehicle can operate it with the knowledge that they are entitled to certain benefits and protections under this law that otherwise would not have been made available to them.

Time and experience have proven that New York City's for-hire sector became the shining example of what a for-hire sector should look like, partially because of its' unique insurance requirements. Passing Int 1050-2024 doesn't stand to lower FHV insurance cost at any significant level, but at the same time, it will send a wrecking ball to the safety and well-being of the riding public and the confidence that the riding public has in the for-hire industry.

Therefore, we humbly request the committee to reject Int 1050-2024.

<u>Steven J. Shanker</u> By: Steven J. Shanker, Esq.

/sjs

Int 1050 - 2024 Limiting the amount of liability coverage that the taxi and <u>limousine commission may require for vehicles it licenses.</u>

Testimony by the Livery Roundtable

Date: 2/11/2025

Honorable Council Members,

My name is Avik Kabessa, I am the CEO of Carmel, and a board member of the Livery Roundtable (LRT). Carmel was formed over 40 years ago as a community car service, serving areas not served by yellow taxis. The LRT is a trade association representing about NYC 240 livery bases.

Carmel and the LRT strongly oppose Int 1050. The elimination of the Additional Personal Injury Protection (APIP) would lead to multiple unintended consequences negatively impacting the for-hire livery sector. Additionally, there have been numerous testimonies provided which misrepresent the implications of this proposed legislation. I will outline some of these misrepresentations to provide the Committee with a better understanding of our sector and why we so strongly oppose this legislation.

First and foremost, it should be noted that not one insurance carrier testified that the elimination of APIP will significantly reduce the cost of the for-hire insurance premium. As a matter of fact, from conversation we held with for-hire insurance carriers, not one of them was able to assess the reduction in premium by more than 2%-3%. In other words, passing Int 1050 may 'save' about \$200-\$300 off the for-hire insurance premium. Saving \$200-\$300 will not save the for-hire insurance issues, yet the elimination of the added protection will place the for-hire industry in much dire situation than it is currently in.

Second, the claim that the Black Car Fund is somehow an alternative to the APIP is false. The Black Car Fund is a Workers Compensation Fund, not an injury fund. Thus, The Black Car Fund is not an alternative to APIP.

Third, the claim that the \$100K liability coverage is somehow an alternative to APIP is also false. Liability coverage, as its' name suggests, protects the driver against being sued by a **third party**, but <u>it does not</u> <u>provide the driver with access to this money for medical treatment or lose wage benefits</u>. Claiming otherwise is to mislead the committee into believing that liability is a replacement for APIP.

Fourth, as stated by Commissioner Do, in contrast to a not-for-hire driver, for-hire drivers log many more miles than a regular not-for-hire driver, and the for-hire driver transports passengers that are not known to the driver. These two differentiating factors expose the for-hire driver to a higher risk of injuries from accidents, in addition to injuries due to crime. Thus, proposing insurance held by the average driver as suitable for the for-hire driver, (PIP at a personal vehicle level) makes no sense and is harmful to the for-hire driver. Higher risk requires higher coverage.

Fifth, the additional cost of the APIP is in direct correlation to the increased risks associated with benefits being paid. Notwithstanding the inability of those testifying to provide this Committee with a percentage of claims which exceed the \$50K basic PIP threshold, the insurance companies have this data and have priced the premium for APIP proportionally. To this point, in the insurance world a driver/passenger is precluded from purchasing \$150,000 in additional protection, as a personal benefit, which is paid in a short timetable at an annual premium of \$500.

We believe the committee should never eliminate a good thing just because some people are using it improperly. While the Committee should examine cases of fraud, the argument that the City Council should adopt Int 1050 to ward off fraud is both ridiculous and harmful to the larger for-hire transportation community. It is akin to eliminating vehicles on the road because some terrorists use vehicles to kill people. Good public policy dictates the maintenance of APIP while the appropriate agencies work to fight fraud. Towards this effort, the LRT is working closely with the State Department of Financial Services on ways to fight for-hire insurance

fraud. And, to that effect, the LRT will be glad to work with this committee on passing laws more precisely targeting fraud.

Finally, paying less for insurance is always nice. However, the cheap becomes very expensive once an accident takes place. There is a saying, "if you want to know the road ahead, ask the people coming back" which applies in this instance. Carmel was in operation years before the APIP was enacted. We saw the benefits it has brought to our industry. Prior to enacting APIP, drivers and passengers involved in accidents were unable to access the benefits when they needed it most. Many of them were forced to use their own personal medical insurance and faced horrible financial difficulties because of paying high deductibles and increasing rates. Some had to settle for less treatment and/or less physical therapy, dooming them to lifelong disabilities. And, in many cases passengers sued drivers for the benefits which the driver had to defend and/or pay out of pocket. That is why APIP was created and that is why it should remain.

For all the reasons listed above, Carmel and the Livery Roundtable urges the Committee to reject Int 1050.

The LRT and I stand ready to answer any questions you have on this issue.

Thank you, Dr. Avik Kabessa

Livery Roundtable – Founding member Carmel - CEO

From:	Israel Acevedo
То:	Testimony
Subject:	[EXTERNAL] "HEARING TESTIMONY 2-10-25
Date:	Monday, February 10, 2025 3:52:24 PM

Good morning, Chair Brooks-Powers and Committee on Transportation and Infrastructure,

I have been an owner operator driving the same for-hire vehicle for the last 8 years and my TLC and DMV license are both clean. In 2021 and 2022 I was paying \$301 in liability insurance, in 2023 \$334, in 2024 \$387 and now for 2025 I am being told it will be \$410.

I am in support of a Local Law to amend the administrative code of the city of New York, in relation to limiting the amount of liability coverage that the taxi and limousine commission may require for vehicles it licenses because we are the safest drivers in NYC and the extremely high insurance we pay is burdening thousands and thousands of drivers.

My email to the underwriting department at American Transit Insurance Company on January 17, 2025.

Good morning,

I'm writing because I would like to know why my premiums keep increasing every year? In 2021 and 2022 I was paying \$301, in 2023 \$334, in 2024 \$387 and now for 2025 I'm being told it will be \$410, why? I'm driving the same car for the last 8 years; my DMV and TLC license are both clean. Why does it keep increasing?

On January 27, 2025 I shared my email to ATIC via email with Council member De La Rosa as I am aware that she is the prime sponsor of Intro1050.

Sincerely,

Israel Acevedo

Kathleen Collins Telephone No.: Email Address:

February 9, 2025

Council Member Selvena N. Brooks-Powers Chair New York City Council Committee On Transportation And Infrastructure Sent Online at <u>https://council.nyc.gov/testify/</u> Emailed to: <u>testimony@council.nyc.gov</u>

Copy emailed to: Julian Martin, Policy Director at

Re: New York City Council Committee On Transportation and Infrastructure-T2025-3081 - Oversight – TLC: The Status of the Yellow Cab Industry

Dear Chair Brooks-Powers;

My name is Kathleen Collins. I am a native New Yorker who is a congenital quadruple amputee who uses a wheelchair. I am on the board of Disabled In Action of Metropolitan New York, Inc. (also known as Disabled In Action or DIA). Disabled In Action is a 501(c)(3) grassroots civil rights organization run by and for people with disabilities. Disabled In Action's mission is to eliminate discrimination for people with all kinds of disabilities. We do not know if taxicabs will pick us up, drive us safely, and in the case of those passengers who use wheelchairs, such as myself, whether they will secure us properly and provide us with a seatbelt and shoulder belt. Further, we do not know whether we will be able to communicate with the drivers and whether the drivers will come to us and assist us to the vehicle and help us embark and disembark. These problems we encounter on a daily basis and they jeopardize our safety; thus, these critical issues need to be addressed.

With respect to proposed bill Int 0373-2024, we do not support this proposed legislation because it just extends the time within which taxicabs need to become wheelchair accessible even though at least 50% of these vehicles were supposed to be accessible by now. Significantly, it seems such legislation would also violate the federal District Court's order that all inaccessible taxicab vehicles scheduled to be replaced now be replaced with wheelchair accessible vehicles until at least 50% of the active medallions are wheelchair accessible. New Yorkers with wheelchairs have waited too long to even have 50% of the taxicabs in operation on the street wheelchair accessible. If the City Council passes this proposed bill it will be sending the wrong message, that is-we, people with disabilities, do not count. Please reject Int. 0373-2024.

With respect to Int. 0676-2024, we submit that this bill needs to be amended to also require that such a study and report include how we can have electric wheelchair accessible for-hire vehicles as well as charging infrastructure available for vehicles, including motorized wheelchairs, in New York City.

Additionally, with respect to Resolution 0080-2024, we submit that this Resolution needs to be changed from funding for the expansion of wheelchair accessible and all electric for-hire vehicles to funding for the expansion of wheelchair accessible for-hire electric vehicles. We would like to see that all future for-hire vehicles that are electric also be accessible.

Finally, we would like to see this Committee support a bill that would require the Taxi and Limousine Commission to continue the Accessible Dispatch Program as it presently operates with a simple structure for reaching an operator to request, in real time by telephone, a taxicab and to be able to call back and reach a real person when guidance is needed to the taxicab as well as follow up on when the taxicab will arrive and other such information. Finally, the City Council needs to provide sufficient funds separate from the Taxi Improvement Fund to pay for this very important program that works.

Thank you for this opportunity to speak. I will be submitting more detailed comments.

Sincerely, Kathleen Collins Board Member of Disabled In Action of Metropolitan New York, Inc.

From:	Lakshmee Lachhman-Persad
То:	Testimony
Subject:	[EXTERNAL] Feb 10, 2025 transportation hearing on yellow cabs Testimony in Support of Accessible Dispatch
Date:	Thursday, February 13, 2025 5:02:02 PM

To whom it may concern:

Testimony in Support of Accessible Dispatch

My name is Lakshmee Lachhman-Persad and I am a strong advocate for accessibility, disability inclusion, and equitable transportation. As someone who frequently uses Accessible Dispatch, I can personally attest to its life-changing impact on New Yorkers and visitors with disabilities. This service is not just a convenience—it is a necessity.

For my family, Accessible Dispatch is the only reliable way to ensure that we can get where we need to go safely. My sister, Nishwani Lachhman, who is visibly disabled, faces constant discrimination when hailing yellow taxis—many simply pass us by. The assurance that we can request an accessible taxi through this service and know that one will arrive removes an exhausting and demoralizing barrier that so many of us face daily.

Beyond individual users like my family, Accessible Dispatch plays a crucial role in making New York City a leader in inclusive transportation. As the publisher of **www.accessibletravelnyc.com** and a contributor to accessibility resources on **NYC Tourism's website** (https://www.nyctourism.com/accessible-nyc/), I reference this program as a **key transportation option** for disabled residents and tourists alike in the video which appears in the middle of the page "How to Explore NYC with a Wheelchair". Visitors from around the world come to New York City because it stands out among major destinations for its accessibility efforts, and Accessible Dispatch is a critical part of that reputation, I know this first-hand. Cutting or weakening this service would not only strip away independence from thousands of New Yorkers but also send a harmful message that the city is moving backward on disability rights.

Transportation is the foundation of social inclusion. Without Accessible Dispatch, many disabled individuals—whether they are going to work, medical appointments, or simply enjoying their city—will face even greater isolation. The city should be

expanding this service, not reducing it.

I urge decision-makers to **prioritize equity, inclusion, and the fundamental right to accessible transportation** by maintaining and strengthening Accessible Dispatch. This service is vital, and its elimination would be a step backward for a city that prides itself on being a leader in diversity and accessibility.

Thank you for your time and consideration.

Please reach out with any questions and if I can be of more support.

Best, Lakshmee and Nishwani <u>www.AccessibleTravelNYC.com</u>

Wins and Celebrations:

We've won a Webby Award with our friends at Lincoln Center! Check out our work on "<u>Disability Pride, Disability Joy" here</u>. Spreading Disability Joy while community building at the <u>New York</u> <u>Botanical Gardens</u>! Accessible Travel NYC receives the <u>Sapolin Public Accommodation Award</u>

from Mayor Eric Adams!

lurleenp
NYC Council Hearings
[EXTERNAL] Opposition to Intro 1050
Monday, February 10, 2025 12:42:39 PM

Hello, my name is Lauren Pine and I am a member of Families for Safe Streets. I'm here to talk to you about my experience and oppose Intro 1050 because the minimum no fault insurance is not enough for victims of traffic violence.

On November 15, 2017, I was crossing with the light in the crosswalk when I was struck and dragged by a construction truck making a right turn.

I was rushed to Bellevue Hospital, where I was put into a medically induced coma for four days. Doctors amputated my entire left leg, completely removing my femur. My broken pelvis healed crookedly, causing pain when sitting or when wearing a prosthesis, both due to near-fatal infection.

The skin on my remaining thigh was immediately ripped from the muscle, resulting ina severe trauma burn. I was in the Burn ICU at New York Presbyterian Hospital for two months. Donor skin from my entire back was peeled off and used as a skin graft to cover my leg, which is completely scarred. I have residual nerve damage and foot drop in my right leg, so I can only use that leg minimally, with a brace and crutches. On my left leg, I have a prosthetic leg that is very heavy and difficult to maneuver. After experiencing a few falls every week, I am now a daily Wheelchair user.

The estimation of benefits billed by my insurance company to the no-fault provider of the private company was around \$3 million. The minimum 50K no fault insurance was exhausted within the first week or so of my hospitalization. That doesn't even begin to speak to my aftercare.

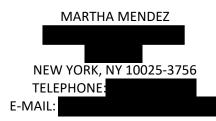
I live alone, and suddenly found myself on disability, which is not a living wage. I have to rely on the charity of my community just to live day-to-day with expenses. My rent stabilized pre-war apartment building could not legally be modified for a wheelchair, so I had to move far from my community to a place I can afford where I rely on my friends to help me.

I am here to give a face to this epidemic and show you what life is like for the thousands of people seriously injured in traffic crashes each year. We are real, we've been hurt, and we don't deserve to be financially devastated from a traffic crash.

If there is any silver lining to my story, it is that even if I cannot return to my former career as a nurse in a cancer center, I can use my voice and visible disability to volunteer and advocate for you and your loved ones.

TLC crashes where pedestrians are killed or seriously injured demand maintaining the minimum coverage. I encourage you to oppose Intro 1050.

Thank you.



February 7, 2025

HEARING ON THE NEW YORK CITY TAXI AND LIMOUSINE COMMISSION- THE NEW YORK COUNCIL COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE FEBRUARY 10YH, 2025

RE: ACCESSIBLE DISPATCH TAXI SERVICE

TO WHOM THIS MAY CONCERN:

I AM WRITING IN SUPPORT OF ACCESSIBLE DISPATCH TAXI SERVICE TO HAVE THE ABILITY TO PROVIDE ALL OPTIONS TO SECURE ACCESSIBILITY FOR ALL.

ALTHOUGH DIGITAL SERVICE HAS ITS' ADVANTAGES. MANY PEOPLE WITH DISABILITIES REQUIRE THE PRESENT CALL IN OPTION. SOME PEOPLE ARE NOT ABLE TO USE CELL TELEPHONES BECAUSE OF POOR HAND AND EYE COORDINATION AND MOVEMENT. IT MAKES IT DIFFICULT TO OPERATE A CELL PHONES. IN BAD AND WINDY WEATHER. MANY HAVE TO WORRY ABOUT BALANCE ISSUES. IT IS DIFFICULT TO HOLD A PEN AND WRITE; WHILE, YOU TRYING TO BALANCE THEMSELF ON ORTHOPEDIC DEVICES.

THE PRESENT SYSTEM, ALLOWS SOMEONE TO TALK TO A PERSON AND GIVE DIRECTIONS ON LOCATION AND PROBLEM ISSUES THAT ARISE; SUCH AS, NO SHOW PROBLEMS WITH EQUIPMENT OR ISSUES WITH COMMUNICATION WITH DRIVERS. I HAD DRIVERS STANDING AT THE WRONG LOCATIONS. MY POOR VISION HAS CAUSED ME TO BE DISORIENTED IN THE EVENINGS AS TO WHERE I AM IN RELATION TO THE DRIVER. ACCESSIBLE DISPATCH, WAS ABLE TO COMMUNICATE WITH ME AND GUILD ME TOWARDS THE DRIVER. THE DRIVER FOUND ME AND WAS ABLE TO CALL OUT AND ASSIST.

BEING ABLE TO TALK TO SOMEONE ON THE TELEPHONE HELPS IN UNEXPECTED SITUATIONS. PLEASE KEEP THIS OPTION GOING FOR ACCESSIBLE DISPATCH AND PEOPLE WITH DISABILITIES.

IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT ME AT: THANK YOU.

MARTHA MENDEZ, LMSW.

CC: DISABLED IN ACTION OF METROPOLITAN NEW YORK.

THE COUNCIL THE CITY OF NEW YORK	
Appearance Card [3]	
I intend to appear and speak on Int. No Res. No in favor in opposition	
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Date: (PLEASE PRINT)	
Name: _Richard Chow	
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Appearance Card 15	
I intend to appear and speak on Int. No. <u>1050</u> Res. No. <u></u> in favor in opposition	
Date:	
Name: Geoff Berman Director of Public	
Name: Jeatt Berman Director of Public Address:	
I represent:	
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I intend to appear and speak on Int. No Res. No
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I represent: Disabled IN Action
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Appearance Card / (
I intend to appear and speak on Int. No Res. No
in favor in opposition
Date: 02/10/2025 (PLEASE PRINT)
Name: Carmen Cruz
Address: Ridgewood NY 11385
I represent: NYTHA
Address :
THE COUNCIL
THE CITY OF NEW YORK
Appearance Card 10
I intend to appear and speak on Int. No. <u>373</u> Res. No.
🗌 in favor 🔲 in opposition
Date: <u>Feb 10, 2025</u>
(PLEASE PRINT) Name: Allison Langley
Address: Astoria MUTITOT
I represent: New YOVR Taxi WOYBERS Alliance
Address :
Please complete this card and return to the Sergeant-at-Arms
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	THE CITY OF NEW YORK
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	I represent: New YORK TAX WORKERS Alliance Address:
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	Name: Samecers States
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	I represent: MIC THY Workan Allas
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Date: 2/10/25
(PLEASE PRINT) Name: Michael Rina
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Appearance Card 5
I intend to appear and speak on Int. No Res. No in favor in opposition
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Name: 2101211 11000
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I represent: Disabled in Hetron
Address: <u>Selie Mahor</u>
THE COUNCIL
THE CITY OF NEW YORK
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in favor in opposition
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THE COUNCIL THE CITY OF NEW YORK
Appearance Card 3
I intend to appear and speak on Int. No. 1050 Res. No in favor in opposition
Date: Deb 10, 2025 (PLEASE PRINT)
Name: PETER M. MAJER
Address: 39-24 24M STREET, LIC, MY LIDI
I represent: METROPOLITAN TAXICAB BOARD OF TRADE
Address: Same
THE COUNCIL
THE CITY OF NEW YORK
Appearance Card 2
I intend to appear and speak on Int. No Res. No. 1050
Date: 2/10/25
(PLEASE PRINT) Name: KJ Singh
Address:
I represent: Maya Assucence Company
Address: 2429 Jackson AU LIC, NY 11107
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Appearance Card 2
I intend to appear and speak on Int. No Res. No
in favor in opposition
Date: Date: Date:
Name: Julia EDEZ
Address:
I represent:
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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: 2-10/25
(PLEASE PRINT)
Name: EVAN HINES
Address: 33 BEAVER ST 2200 FL NY NY 10004
I represent: NYC TLC
THE CUTY OF NEW VORK
THE CITY OF NEW YORK
Appearance Card
I intend to appear and speak on Int. No Res. No
in favor in opposition Date: 2/10/25
(PLEASE PRINT)
Name: David Do TLC COMMISIONET
Address: <u>33 Bequer Street, 22nd FL.</u> New york, Nylong
I represent: Taxi and Limousine Commission Address: 33 Beaver street, 22nd fl., New york, Ny 10004
THE COUNCIL
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Appearance Card
I intend to appear and speak on Int. No Res. No
in favor in opposition
$Date: \frac{2/10/25}{}$ (PLEASE PRINT)
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Address: 33 Beaver Street 22nd SI. Wenyork, Ny 10004
I represent: Tax and Limousine Commission
Address: 33 Beaver Street, 22ad Kl., New york Alylows4
Please complete this card and return to the Sergeant-at-Arms