

CITY COUNCIL TESTIMONY FOR MIDORI VALDIVIA

Taxi & Limousine Chair and Commissioner

Good morning, Chair Ung and members of the Rules, Privileges, Elections, Standards, and Ethics Committee. Thank you for this opportunity.

My name is Midori Valdivia, and I'm honored that Mayor Mamdani has nominated me to serve as Chair and Commissioner of the Taxi & Limousine Commission, the TLC.

Let me start by acknowledging why I'm here.

Transportation is opportunity. For nearly 180,000 drivers, it's how they earn a living and support their families. For millions of New Yorkers, it's access to jobs, healthcare, and education. For passengers with disabilities, it's true independence.

But here's what I've learned: Opportunity doesn't just happen. We have to define what kind of system creates it—and for whom. Then, build the infrastructure to make that real.

As an immigrant, as a Latina, I've lived this truth across three countries. My family immigrated from Peru to Japan, where I grew up in Osaka. I watched little kids walk to the grocery store alone because the streets were designed to be safe. Public transit was designed with a vision: everyone participates in society. Then we immigrated to Pittsburgh, and I saw what happens when you don't have that vision—when transportation reflects *inequality* instead of *opportunity*.

That taught me: The systems we build are choices we make, not inevitabilities we accept.

I've spent over 15 years at that intersection—transportation and opportunity.

At the Port Authority of New York and New Jersey, more than a decade ago, I saw TLC drivers waiting all day for just one or two fares. There, I had the opportunity to partner with labor leaders who led the fight for the first wage standards for airport service workers.

As Chief of Staff at the Metropolitan Transportation Authority—a 70,000-person agency—I aligned the right people to drive major infrastructure initiatives, such as improving subway countdown clocks that provided riders with information and respect, and the launch of OMNY, the MTA's contactless payment system. And I worked with a team to shepherd congestion pricing through state legislation —understanding that dependable transit requires sustainable transit. Like TLC drivers, I don't like traffic. No one does, and this was a meaningful step to better our streets.

At TLC, I was the Deputy Commissioner for Finance and Administration. I helped build the first-of-its-kind accessible vehicle program using driver incentives that worked. I contributed to the first driver pay study. And I led TLC's first engagement with national regulators on predatory lending practices that targeted small medallion owners.

Back then, I was reacting—to tech companies, to debt, to complaints—instead of asking: What kind of system do we want? One where drivers can work with dignity and economic sustainability, or one where they're trapped?

So I'm answering that question now.

Today, TLC facilitates and regulates a little under one million trips a day—comparable to the entire transit system of a major American city. The agency is key to how New Yorkers get to work, to healthcare, to opportunity. That's our current role. And it builds on our founding mission from 1971: protect the passengers and drivers by setting safety standards and taxi rates.

Today, the threat is different from 1971: algorithmic platforms that control workers without transparency and extract value without accountability, stifling competition. The mission hasn't changed. Protect people from exploitation. But who needs protection and from what—that's evolved. And so must we.

In the next few years, TLC will answer questions that shape transportation for a generation: How do we protect hundreds of thousands of workers when the market is disrupted or changed? How do we ensure platforms use our public streets to serve the public good? Those answers won't just determine New York's future. They'll set the standard for cities across the country. That's the opportunity—and the responsibility—in front of us.

I want a for-hire transportation system where:

- Professional drivers have professional working conditions and economic security—not just survival, but the ability to build wealth and thrive. And trips that are affordable and truly accessible for the passengers who rely on them
- Every New Yorker can access our services—regardless of ability or zip code
- Technology that serves the public good with transparent rules, fair competition, and accountability to passengers, drivers, and the city

That's Mayor Mamdani's vision. And it's my vision. We came to this through our own experiences—he through organizing with drivers, me through 15 years building transportation teams, policies, and systems. **Now we get to build it together.**

Here are my three priorities and some of the ways I will address them:

First: Economic infrastructure and support resources for drivers. Here's what I mean: Expanding debt relief. Catching violations before workers have to file complaints. A comprehensive penalty review—the first since 2016. Because workers—many of them immigrants like my family—deserve economic security, not outdated practices.

Second: Clear standards for corporate accountability and enforcement. TLC should enforce rules on the books to protect both drivers and passengers. And TLC should set standards BEFORE deploying new technology, with verified safety data, equitable driver support, and accessibility from day one.

Third: A transportation system that works together with passenger and driver safety at the center. TLC regulates a quarter of all public transportation trips in the City—with nearly one million trips every day. So it must work as part of that larger transportation system. That means bringing in a taxi driver's perspective on a new bus lane and training them on the rules, for example. Riders don't experience taxis, bikeshare, or the bus as separate systems—they just need to get somewhere.

Our transportation needs to reflect that—one city, one transportation system.

I bring both professional expertise and personal understanding to this role. My expertise spans bus, rail, aviation, and shared mobility. I serve on the MTA Board and, until recently, on the boards of TransitCenter, the Shared-Use Mobility Center, and the Regional Plan Association.

And as an immigrant, as a Latina, as a mom, as a transit wife—I understand what's at stake when transportation determines opportunity. Not just as policy, but as lived experience.

My husband worked every single day during COVID as an essential MTA worker, all while I was pregnant. I've watched him navigate workers' compensation issues and struggle to get bathroom breaks because the system was delayed, even with crew rooms and lockers. Taxi drivers have nowhere to go. That's what drives me.

I worked to build a yellow taxi wheelchair-accessible fleet alongside a formidable disability advocacy coalition to reach 50% accessibility, and the TLC has done it. I

know what change means for my neighbors who rely on these taxis to move freely in the City.

I know many of you have fought — and continue to fight — for the vision of accessibility and driver dignity I shared—for debt relief, for transparent wages, for supportive resources and conditions. Thank you. I want to be your partner in that work.

I'm grateful to the TLC team, who have maintained this agency's commitment to serving New Yorkers. TLC's mission has always been clear: set standards for this industry. And the team has done that faithfully. So we're not changing TLC's core mission. We're doubling down on who we protect and what we protect them from.

Together, we'll build on the foundation the TLC team has maintained, evolving it for the transportation landscape we face today.

The choice isn't between innovation and regulation. It's between letting others define our future or defining it ourselves.

Transportation determines who has opportunity. TLC can ensure everyone does.

That's my vision. I'm asking for your partnership to make it real.

Thank you. The City Council has always been a major partner to TLC, from appointing commissioners from each borough to collaborating on legislation to ensure passenger safety and economic dignity for drivers.

I'm ready for your questions about my vision for the TLC and the work we can accomplish together.



Testimony to Committee on Rules, Privileges, Elections, Standards and Ethics

Topic: Communication from the Mayor – Submitting the name of Ms. Midori Valdivia to the Council for its advice and consent regarding her appointment to the New York City Taxi and Limousine Commission, pursuant to Sections 31 and 2301 of the New York City Charter.

Date: March 12, 2026

My name is **Matthew W. Daus, Esq.**, the longest serving former Commissioner/Chair and CEO of the NYC Taxi & Limousine Commission (TLC) and President of the International Association of Transportation Regulators (IATR). It is my pleasure to submit testimony in support of Mayor Zohran Mamdani’s nomination of Ms. Midori Valdivia to be the next TLC Chair/CEO.

The **International Association of Transportation Regulators (IATR)** www.iatr.global is a non-profit organization that serves as an educational platform for government transportation officials. Since its establishment in 1989, the IATR has focused on sharing information and best practices across various government agencies involved in licensing, regulating, and contracting with for-hire ground transportation services. These services include taxicabs, micro-transit, micro-mobility, buses & motor coaches, black cars & limousines, paratransit & non-emergency medical transport, and Transportation Network Companies (TNCs) – ride hailing apps. IATR members consist of international and domestic cities, states & provinces, federal & quasi-governmental entities such as airports, departments of transportation and motor vehicles, planning agencies, public utilities commissions, and taxi commissions.

The motto and mission of the IATR is **"Multi-Modal Mobility Innovation For All!"** aiming to promote the principles of transportation equity (affordability & accessibility), sustainability, health and safety, technology innovation & automation, open public data, and sound multi-modal governance. The association fulfills its mission through conferences, committee meetings/programs, as well as reports, model regulations and guiding policy principles on a wide variety of mobility topics – including but not limited to congestion mitigation, regulatory modernization, road safety, sustainable transportation, wheelchair accessibility, affordability (for drivers and passengers) and service to low-income communities and transit deserts.

I have personally been through the NYC Council’s advice and consent process twice, and appreciate not only the attention to vetting candidates that both the Mayor and the Council undertake, but it is admirable to allow members of the public testify and provide input on positions as important as TLC Chair – which impacts the lives and businesses of so many people. I provide this background not only as IATR President, of which the NYC TLC has been long involved as a member going back decades, but also personally, as someone who has done the job

FOR THE RECORD



for longer than anyone else. I served as Special Counsel and General Counsel to the TLC for many years before being appointed to serve as Chair/CEO for almost 9 years, for a combined 14 years at the agency, so I know firsthand the skills sets that are needed to be effective at this position.

I first met Midori Valdivia more than 10 years ago when she joined the TLC and served as Deputy Commissioner for Finance & Administration. I got to know her better in this capacity, as TLC was involved with IATR and attended/spoke at our conferences to share NYC's experiences in the field of taxi and for-hire regulation many times. I was impressed at the beginning with her professionalism, demeanor, knowledge and experience, as well as her commitment and passion for transportation.

I believe that Midori Valdivia may be the most experienced multi-modal mobility professional to ever be nominated for this position, given her extensive resume. IATR is committed to ensuring that TLC regulators do not exist on an island, siloed from other transportation modes and agencies that affect mobility holistically, and Midori's multi-modal track record provides incredible insight and understanding in the role that TLC licensed drivers and businesses play in the broader transportation ecosystem.

Midori's prior experience at the Port Authority is critical, as she understands full well the importance of the area airports as a vital economic resource for TLC drivers and their livelihoods. Likewise, her service as Chief of Staff to the CEO of the MTA, as well as her subsequent role as MTA Board member, provides the TLC with great insight and understanding into not only the role of MTA programs like congestion pricing and Access-A-Ride, but also into the future of multi-modal first and last mile connections, and other ways in which TLC can collaborate with public transit.

Midori's years of prior experience at TLC, however, is the most important qualification – as she will hit the ground running and knows not only about the policies and issues ahead of time – but understands the operations of the agency. It is so important that the agency run efficiently and effectively for its licensees and this is a skill set Midori has that is needed always as TLC is the largest regulatory agency in the U.S. Finally, the most encouraging prior experience that I have not seen before in an applicant, is her prior fellowship work at Coro for not just herself, but also her return to serve as Chief Operating Officer. Midori's commitment to mentoring and encouraging public service careers is critical at this point in time, and I know this skill set and personal priority of hers will translate into effective leadership to attract more talent to the agency.

Personally speaking, I have always had thoughtful, professional and meaningful interactions with Midori. Whether speaking and collaborating at conference on panels, testifying on opposite sides in court proceedings as expert witnesses, attending events or conducting



business with the TLC, the Port, MTA or Coro – consistently over the years, she has demonstrated a can-do positive attitude, innovative approaches to regulation and transportation policy, and the utmost in respect and professionalism. These are the skill sets that are important and needed to run the TLC. Knowing how to manage people internally as well as external stakeholders is the key to success. Communicating well, being transparent and inclusive with all licensees and stakeholders, is the hallmark of being effective in this position. Midori, in my opinion, has already demonstrated that she has the experience and philosophy to govern not just through her resume, but through my personal observations and through support and admiration in the regulatory community at IATR.

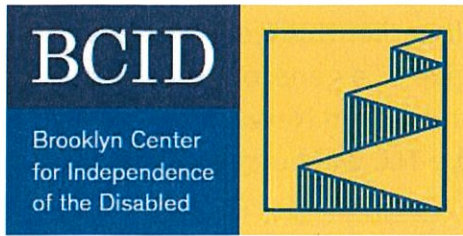
In sum, the IATR supports Midori Valdivia’s nomination, as we know her and she brings the skill set and experience that our organization wants to see transportation regulators have everywhere, but especially at the NYC TLC – which people around the world look to as the ultimate regulatory leader in the field. We are confident Midori will do an amazing job and bring the agency to new levels of success emphasizing the Mayor’s and the NYC Council’s commitments to sustainability, equity/affordability, Vision Zero, accessibility and support of the well-being of drivers first and foremost. IATR recommends that the NYC Council approve her nomination, without hesitation or reservation.

For further information, please visit our website at www.iatr.global/. Please feel to contact me at 646-261-1590 or mdaus@iatr.global to answer any questions you may have.

Sincerely,

A handwritten signature in black ink that reads "Matthew W. Daus". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Matthew W. Daus, Esq.
IATR President



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**Testimony of Joseph G. Rappaport, Executive Director,
before the New York City Council's Committee on Rules, Privileges, Elections, Standards and Ethics
considering the nomination of Midori Valdivia as TLC Chair**

March 12, 2026

Good afternoon. I am Joe Rappaport, Executive Director of the Brooklyn Center for Independence of the Disabled (BCID). Founded in 1956, we are a disability-led independent living center that provides services and advocates for disabled people in Brooklyn and across the city and state.

BCID is a core member of the Taxis For All Campaign (TFAC), advocating for wheelchair-accessible taxi and for-hire service based on universal design principles. We are a coalition of disability groups, including the city's independent living centers, United Spinal Association, and Disabled In Action of Metropolitan New York.

The ability to get around the city by yellow taxi and for-hire vehicles is essential for wheelchair users, blind people and other disabled New Yorkers and visitors. Before TFAC started 30 years ago, there wasn't one accessible vehicle on the road. People who use wheelchairs couldn't take a taxi or use a car service to get to a last-minute appointment, to accompany a spouse or another loved one to the hospital in an emergency, or do the multitude of other things that other New Yorkers take for granted when they hail or call for a ride.

We've made progress, though there is much more to do. In 2009, we sued the New York City Taxi and Limousine Commission over the lack of accessible medallion taxis, winning a settlement in 2013 for 50% wheelchair-accessibility by 2020. Our attorneys at Disability Rights Advocates then returned to court on our behalf in 2023 when the TLC claimed it could not meet the 50% goal, again forcing the City to adhere to our settlement. Currently, at least 50% of yellow taxis in service are accessible.

The Taxis For All Campaign also pushed for accessibility requirements for FHV vehicles and played a major role in winning the current guidelines for accessibility on Uber, Lyft and other services. We also have joined other groups, including some represented today, who have advocated for more accessible transportation in New York City and New York State and for accessible electric vehicles.

Several of our groups met with the nominee for TLC chair earlier this week to discuss many of the priorities below. We appreciated her willingness to give us a generous amount of time and we hope this is the beginning of a fruitful relationship for disabled New Yorkers and all of us. Here are several of our current priorities that we hope the TLC will pursue, along with the City Council.

INCREASED WHEELCHAIR-ACCESSIBLE VEHICLE (WAV) AVAILABILITY

- 1) Increase accessibility to 100%:** In 2013, the Taxis For All Campaign agreed to the 50% accessibility mark as a compromise with the Bloomberg administration, but TFAC has long advocated for a fully accessible yellow taxi and FHV fleet:
 - The TLC remains in a position to be a national leader in the drive to increase the number of accessible yellow and FHV vehicles on the road.
 - Full accessibility would make it harder for drivers to ignore hails, since they would realize they would be losing business in spite of having procured an accessible vehicle.
 - We also support efforts to introduce accessible electric vehicles but have urged the TLC to mandate electric vehicles only if they are also accessible.
 - The TLC also should review its approval process for accessible vehicles, which vendors have claimed seems designed to prevent competition.

- 2) Reduced response times for FHV vehicles:** The TLC introduced performance standards for Uber, Lyft and other FHV providers several years ago. Over the past several years, NYLPI has surveyed response times for WAVs and has found disparities in service.
 - Response times vary by location, with some parts of the city poorly served. The TLC should test by smaller geographic areas, with an emphasis on testing the availability of accessible vehicles in Staten Island and other more distant locations.
 - The TLC should change response times so that FHV providers are required to pick up passengers more swiftly.

- 3) Restore Accessible Dispatch:** After our 2013 settlement, TFAC advocated for a dispatch system so that wheelchair users would be able to get a taxi even with limited accessible-taxi availability. The program worked, but the TLC chose to end the program last month:
 - This program turned out to be vital since hailing an accessible taxi has proved to be almost impossible. (See Refusals, below.)
 - Beyond that, accessible vehicles often are not readily available in many neighborhoods, even as their numbers have increased; Accessible Dispatch deployed vehicles to callers who otherwise might be stuck without transportation.

- The TLC's Accessible Dispatch program's contractor, MTM, employed disabled New Yorkers to answer phones and dispatch accessible vehicles. Riders with speech differences or who don't have smart phones (or can't use them) could call to get a ride by calling a number and getting a ride dispatched quickly without having to turn over their credit card account numbers.
- Tourists and other visitors who use wheelchairs also used Accessible Dispatch, since calling for a ride didn't involve multiple steps.
- Unfortunately, ignoring the request by disability advocates, the TLC ended this program last month. Instead, the TLC has opted for a more automated system that is hard to use and unreliable. Previously, riders could just make a phone call and pay in cash. Now, the TLC's vendors – Myles, Arro and Curb – require callers to put in credit card information. Some riders want to or must pay in cash.
- The TLC's own surveys showed that the new program does not work, and the TLC tells us that it has received 750 complaints since it started winding down the program.
- **We urge the TLC and the City to restore funding for a valuable program that served thousands of disabled (and non-disabled) New Yorkers annually.**

REFUSALS

- 4) **Significantly increase the use of securement to keep wheelchair users safe:** Seat belts are essential and legally required for all vehicle passengers, but drivers often refuse or don't know how to use the straps essential for wheelchair users to ride safely. More often than not, passengers using wheelchairs have to affirmatively request that they and their chair be properly secured. This is a systemic problem that has existed for several years.
 - **The lack of securement puts riders who use wheelchairs at risk for serious injury or death.**
 - In our experience, most drivers don't want to secure passengers and seem to believe wheelchairs don't need to be secured.
 - If a potential passenger turns down the ride because they won't be secured properly, this amounts to a service refusal.
 - Drivers often store personal items in the trunk that make it impossible to get into the vehicle or claim they don't know how to secure passengers.
 - Design flaws also make it harder for drivers to use securements. The front securements are attached to the vehicle, but the back straps are loose and sometimes removed altogether.
 - The TLC should explore whether Q'Straint or other models that are easier for drivers to fasten on a passenger can be retrofitted into vehicles already in service.

- Possible remedies include:
 - Design changes
 - Better training
 - Penalties
 - Competitions for drivers to demonstrate their securement skills.

5) Reduce refusals by drivers to wheelchair users, blind people and others: Anyone who uses a wheelchair in New York City who has tried to get a cab or for hire vehicle has experienced driver refusals. Blind passengers, whether or not they have a service dog, also experience systemic refusals, with drivers speeding by them. Riders must then resort to tactics, including recruiting a friend or even bystanders, to hail a cab:

- **This is a safety issue: Blind people or people who use wheelchairs may be left in an unfamiliar neighborhood.** During various weather conditions their health can be adversely affected when left waiting.
- Street hails are almost impossible, in spite of the increase in the number of accessible yellow taxis.
- Dispatchers at the city's airports and other taxi stands often let drivers of accessible yellow taxis refuse to take wheelchair users, without any repercussions. Passengers often must use Uber or Lyft instead because they know they'll be refused service.
- If a person has a service dog, many drivers will refuse to carry them. Some riders resort to using Uber Pet, which costs more and may mean longer waits.
- The number of Uber and Lyft refusals is unclear because each company self-reports about its responses. Riders who request rides may find themselves having to repeatedly request them on the app. Further, when an Uber or Lyft driver accepts a passenger and then, on arrival, refuses to take the passenger, the information needed for a complaint disappears from the passenger's app.
- Other possible solutions:
 - Incentives for drivers
 - driver education campaign and improved training
 - Ensure drivers can communicate effectively
 - Change app so passenger's account keeps the information needed to make a complaint.
 - Penalties if necessary

OTHER PRIORITIES

6) Communications between drivers and the disability community: TFAC has worked with the Taxi Workers Alliance and other driver groups for decades. Nevertheless, the TLC

must play a role in fostering communication between us with the goal of reducing refusals and improving cooperation between our groups.

- 7) **Work with the MTA to expand e-hail services to more Access-A-Ride users.** The MTA's on-demand program allows flexibility for riders who otherwise must reserve a ride a day or two in advance. But only about 1% of AAR riders have access to on-demand, which costs the MTA less per ride but greatly increases the ability to travel freely. It also can increase business for taxi drivers.
- 8) **Increase training for drivers about "disability etiquette" and securement with hands-on training by disabled people.** The TLC had recently shared updates with us on their training that includes opportunities to physically show capability at securing a wheelchair, but this part of the training should include an actual wheelchair user and include opportunities for the demonstration of how to secure a wider range of wheelchair types and sizes, including scooters and other devices that present unique difficulties for securement. Riders with disabilities should teach at least some of the material themselves.
- 9) **Safe pickups and drop-offs, including safe pathways between vehicles and sites.** As we discussed yesterday, the current NYC streetscape makes it difficult for drivers and passengers to complete pickups and drop-offs where there is a safe pathway from the vehicle in the street to the sidewalk and vice versa. When drivers know the safest area for them to drop-off or pick-up their passenger, they still fear ticketing or penalties from other City agencies. Passengers often have to navigate pathways blocked by bollards, Citibike stations, moving or stationary vehicles, and busy streams of bicycle traffic just to get to the curb. We think the TLC can do more to work with us, the drivers, and the city to improve street design.



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To the Ethics and Rules Committee

Testimony to the committee for the hearing on 3-12-2026 held about the nomination of Midori Valdivia as Chair of the Taxi and Limousine Commission

I'm Jean Ryan, president of Disabled In Action of Metropolitan NY and a member of Taxis for ALL Campaign, a coalition we began in 1996.

DIA is in favor of appointing and confirming Midori Valdivia as chair of the TLC. She worked on the TLC before and knows the issues of people with disabilities from that work and as a board member of the MTA, a position we want her to be able to continue in. Our issues with the MTA and the TLC intersect in many ways including the on demand program and broker services.

We wouldn't have accessible taxis, Uber and Lyfts, and FHV car services without Taxis For All continually advocating for accessible vehicles and our ability to get rides. No city in the United States has wheelchair access to this form of public transportation like New York City does.

And yet, we and specifically I cannot hail an accessible cab! And we have to wait longer or are unable to get an Uber or Lyft vehicle in a timely manner if at all. We are hoping to work with the TLC and stakeholders to get better access, to have 100% accessible taxis and for hire vehicles, and to revive the formerly well functioning Accessible Dispatch program so people with disabilities can get a cab from anywhere in the City.

Thank you,

Jean Ryan, president
Disabled In Action of Metropolitan NY



**Statement of Justin Wood and Ruth Lowenkron at
New York Lawyers for the Public Interest to the
NYC Council Committee on Rules, Privileges, Elections, Standards, and Ethics
on March 12 2026 Regarding the Appointment of Midori Valdivia as
Taxi and Limousine Commission Chair**

Dear Chair Ung and Members of the Committee:

Thank you for the opportunity to comment on the nomination of Midori Valdivia to serve as the Chair of the New York City Taxi and Limousine Commission (TLC). For well over a decade, New York Lawyers for the Public Interest (NYLPI) has advocated for the interests of transit, paratransit, taxi, and for-hire vehicle (FHV) riders with disabilities, in close partnership with the Access-A-Ride Reform Group (AARRG!) and the Taxis for All Campaign.

We strongly support Mayor Mamdani's nomination of Midori Valdivia as Chair of the Taxi and Limousine Commission. In addition to her extensive background as a public transportation planner to this role, Ms. Valdivia has specific experience in bringing urgently needed wheelchair accessible taxis and FHVs to New York City's streets. As an MTA board member, she consistently championed accessibility, and listened thoughtfully to transit and paratransit riders with disabilities.

New York City and State need taxi and limousine regulators who prioritize accessibility while ensuring equitable compensation for drivers and reducing the climate impacts of the massive vehicle fleets dispatched on our public streets by massive corporations like Uber and Lyft, which reported a combined \$58 billion in revenue last year.

For far too long, riders with disabilities have been left behind in New York City and State – first, by the yellow taxi industry, and in recent years by the explosive growth of large FHV corporations. Since 2018, NYLPI has performed extensive testing to evaluate whether FHV and taxi dispatch apps like Uber and Lyft provide equivalent service to disabled and non-disabled customers. While the TLC has made progress in requiring this industry to meet minimum response time requirements for wheelchair accessible vehicle (WAV) ride requests, [our recent report](#) finds that significant disparities remain, especially in outer borough locations.

Meanwhile, New York State and populous counties adjacent to New York City have left this industry essentially unregulated, meaning that Uber and Lyft do not provide any WAV service outside of the five boroughs, making travel outside of the five boroughs burdensome or impossible for many riders with disabilities.

We hope to partner with the TLC, the City Council, and with the Mamdani and Hochul administrations to simultaneously address accessibility, sustainability, and just compensation for drivers. Below are some of our relevant policy priorities:

1. Design and Availability of Accessible Zero-emissions Vehicles

One global automaker [recently announced](#) a new zero-emissions van that can accommodate a side-loading wheelchair ramp. We are hopeful that similar wheelchair-accessible zero-emissions vehicles (EVs) will soon be available for sale or retrofitting in the U.S. We urge the TLC to rapidly test and approve any new WAV EV models, and to engage people with disabilities directly in designing, retrofitting, and testing such models.

2. Subsidies and Tax Exemptions for Accessible Zero-emissions Vehicles

We hope to work with the TLC, other taxi and limousine commissions in the metro region, and New York State's Chief Disability Officer to identify necessary subsidies and funding mechanisms to ensure that accessible zero-emissions vehicles are rapidly purchased and deployed throughout the FHV and taxi fleets, and have sufficient public charging infrastructure.

At the state level, we support passage of [S5552A / A6635A](#), which would enact a statewide \$1 accessibility surcharge and dedicate approximately \$250 million in annual revenue to support the purchase and operation of zero-emissions WAVs, expansion of on-demand paratransit programs, and necessary charging infrastructure. We similarly ask the Council to pass [Resolution 81 of 2026](#) (Farias) in support of this legislation.

As new EVs suitable for wheelchair ramps are brought to market, we also need to ensure that retrofitted vehicles are eligible for sufficiently generous [state rebates](#). The TLC can advocate for state and city [sales tax exemptions](#) for zero-emissions WAVs, and explore opportunities to support public EV charging infrastructure through programs like the [Transit Ready NY program](#) of the New York State Department of Transportation (DOT).

3. Accessible Zero-emissions Vehicle Fleet Mandate for For-Hire Vehicles and Autonomous Vehicles

As it has done with the Green Rides initiative, we urge the TLC to mandate that high-volume FHV providers meet fleet-wide minimum percentages of zero-emissions WAVs as these vehicles become available. This could be pursued in coordination with nearby county and municipal taxi and limousine commissions in Westchester, Nassau, etc., to increase the supply of WAVs and paratransit services traveling across the metropolitan area.

We further urge that any future testing or pilot programs enabling autonomous vehicles (AVs) to operate in New York City include a robust accessibility mandate.

4. Variable Taxi Improvement Fund Payments for Accessible Zero-emissions Vehicles

To encourage the adoption of accessible EVs, the TLC should seek to modify the Taxi Improvement Fund (TIF) to allow for larger payments to drivers who purchase and operate sustainable accessible vehicles, or seek additional sources of grant funding to augment current TIF payments.

5. Partner with the MTA to Expand On-Demand Access-A-Ride

The Access-A-Ride on-demand e-hail pilot has provided life-changing benefits for the relatively few paratransit users who have been able to enroll. The program provides on-demand trips from TLC-licensed contractors at [less than half the per-trip cost](#) of traditional Access-A-Ride contractors. To ensure the program's ongoing success and expansion, we urge the TLC to impel the MTA to extend the program to all riders and to eliminate all caps on rides. It is also our hope that the TLC will advocate for equitable pay for Access-A-Ride drivers.

6. Analyze and Report on WAV Response Times by Location

Current TLC regulations require high-volume FHV companies to meet citywide response time benchmarks for WAV service. We support additional analysis to disaggregate WAV response by community district, neighborhood, or zip code to allow the TLC and advocates to identify and target areas with the largest disparities in WAV availability and response times.

7. Collect and Publish Fleet Electrification Data

The NYC FHV fleet is poised to become one of the largest EV fleets in the world, and NYC should function as a laboratory of real-world, real-time data on EVs (as it is now on congestion pricing).

For example, the TLC should collect, publish, and make available to researchers a wealth of data on: a) the efficiency and performance of EVs under varying weather conditions; b) long-term EV operating costs; c) optimizing the charging network; and d) comparative crash and fire safety for EVs versus internal combustion engine vehicles.

The TLC should also seek to collect, publish, and make available data on the fuel efficiency and emissions impact of gasoline and gas-zero-emissions hybrid vehicles in the FHV and taxi fleets. Of particular concern are large SUV models that are both inaccessible to people with disabilities *and* create unnecessary climate and safety risks.

8. Collaboration with Other Cities and States

We encourage the TLC to work with other cities and states which are working to improve accessibility and electrification in the FHV industry. For example, California recently implemented an [accessibility surcharge](#) on Uber and Lyft trips, and Washington, DC is considering a similar program. As zero-emissions WAVs become available on the U.S. market, cities and states working together can create a large (and potentially subsidized) market for these vehicles, ensuring that auto manufacturers and retrofitters have strong incentives to produce and distribute these vehicles as quickly as possible, and at a competitive price.

Thank you for the opportunity to comment on this nomination; we look forward to continuing partnership to make these priorities a reality.

Yours,



Justin Wood
Director of Policy



Ruth Lowenkron, Esq.
Disability Justice Program Director