



June 16, 2021

Taxi and Limousine Commission
33 Beaver Street, 22nd Floor
New York, New York 10004.

RE: Internet Association Concerns – Battery Electric Vehicles exemption

Dear Commissioners:

Internet Association (IA) is writing to respectfully express concerns over the tone and direction of current policy conversations surrounding the regulation of beneficial app-based for-hire vehicle (FHV) services. We are particularly concerned with the Taxi and Limousine Commission's (TLC) efforts seeking to lift the exemption for battery electric vehicles under the licensing cap for FHV's.

IA is the only trade association that exclusively represents leading global internet companies on matters of public policy. Our mission is to foster innovation, promote economic growth, and empower people through the free and open internet. We believe the internet creates unprecedented benefits for society, and as the voice of the world's leading internet companies, IA works to ensure legislators, consumers, and other stakeholders understand these benefits.

The proposed rule is a step backward from the progress New York City has made with respect to both innovation and environmental conservation. Preventing more eco-friendly vehicles from replacing traditional gas-powered vehicles on the road is contrary to the City's stated goals of reducing emissions and creating a future filled with sustainable, environmentally conscious mobility options.

Further, the apparent reason for the removal of the exemption is the increase in congestion caused by the number of battery electric vehicles allowed on the road currently. However, there is a massive discrepancy between the number of gas vehicles that have been taken off the road since the imposition of the licensing moratorium on FHV's and the number of battery electric vehicles that have been licensed. Some 15,000 gas vehicles have been replaced by a mere 400 battery electric vehicles since 2019. New York City should be encouraging more battery electric vehicles to enter the market and incentivizing FHV operators to go green. The proposed rule would do the exact opposite and leave only large emission-producing, wheelchair accessible vehicles able to obtain a new license.

President Biden has made green infrastructure a national priority. His proposed infrastructure spending bill would offer significant incentives to consumers who purchase battery electric vehicles. This increased access can only help accelerate the goals of the city with regard to reducing emissions and creating sustainable transportation infrastructure. We would strongly encourage the TLC to find alternative means to combat alleged congestion that does not deprive FHV operators of earning opportunities beyond emission-producing vehicle options.



For these reasons, IA urges the Commission to reconsider implementing the proposed rule. I welcome any questions you may have regarding IA's position and can be reached at olsen@internetassociation.org or 518-242-7828.

Sincerely,

A handwritten signature in black ink, appearing to read 'JOHN OLSEN'.

John Olsen
Director, State Government Affairs Northeast Region