February 2023

Charles Ukegbu, Assistant Commissioner of Regional & Strategic Planning

NYC Department of Transportation

55 Water Street, 6th Floor

New York, NY 10041

***submitted via email***

**RE: Proposed amendment to Section 4-08 of the Traffic Rules to establish loading zone regulations**

Dear Assistant Commissioner Ukegbu:

United Parcel Service (UPS) is a global logistics firm. In the New York City region alone, UPS is responsible for well over 600,000 packages daily; which includes critical deliveries of everything from vital business documents to medications for those most vulnerable. Our 5,500 workers in New York City rely heavily on a carefully planned and considered logistics system that is meant to both ensure timely delivery while taking into account important mobility and sustainability goals.

UPS is dedicated to supporting and working with our partners in government on innovative solutions to curbside management in New York City. This collaboration has led to comprehensive efforts to reform loading zone regulations and implement new technology to improve the efficiency of last mile deliveries.

We commend the Department of Transportation (DOT) for taking the necessary steps to address some of the challenges of finding curbside loading space through the proposed amendment to Section 4-08 of the Traffic Rules that would establish loading zone regulations. In designating “Loading Only” zone signage strictly for expeditious pick-up and drop-off of goods and passengers from commercial, for-hire and personal vehicles, last mile deliveries in New York City will in turn be more seamless. Additionally, prohibiting agency-authorized or single use permits from parking in these “Loading Only” zones will ensure the curbside space is being maximized for proper use.

While this is a great step towards creating safer curbside management and streets, we strongly urge DOT to work with the relevant enforcement agencies to ensure that these zones are not occupied by idling non-commercial vehicles. Without a stringent enforcement mechanism, vehicles making deliveries will continue to struggle to find adequate curb space, leading to congestion in dense locations. We also urge DOT to review the existing three-hour limit on commercial parking to encourage companies to maximize efficiency and reduce unnecessary congestion.

UPS committed to maintaining our delivery service while also assisting the City in envisioning how to efficiently use public spaces in ways that best serve everyone involved. Thank you for this opportunity to comment on the proposed rules to establishing loading zone regulations.

I welcome further discussion on these vital issues with you and your colleagues within DOT.

Sincerely Yours,

Axel Carrion

*Vice President*

*UPS Government Affairs*