



Carmel Car & Limousine Service  
2642 Broadway, New York NY 10025

7/31/2023

TLC Hearing Re:

**Amendment of Rules Related to In-Vehicle Camera Systems for Taxis and Street Hail Liveries**

Testimony by Dr. Avik Kabessa

Good morning Commissioners,

My name is Avik Kabessa, I am the CEO of Carmel, a member of the Livery Round Table, and the Chairman of the Livery Workers Compensation Fund.

Carmel strongly supports the proposed amendments to the In-Vehicle Camera System, especially making installing a camera in a non-SHL Livery vehicle optional rather than mandatory. This is a long overdue amendment that fits the industry's reality today and Carmel applauds Commissioner Do for proposing it.

When the present mandatory camera requirement was first imposed on Livery in 2,000, the livery sector was the largest sector in the For-Hire industry, with approximately 28,000 Livery vehicles (as opposed to about 8,500 Black Cars). Furthermore, in 2,000, the type of Livery passengers was distinctly different from the corporate traveler using a Black Car.

Things have changed in the last 23 years. Today, non-SHL Livery is the smallest sector of the For-Hire industry, with 3,620 Livery vehicles (as opposed to 92,691 Black Cars), and there is no differentiation between the passengers of the two sectors.

Despite this evolution, it remains mandatory for only Livery to install a specific, expensive, and outdated camera. It costs between \$900 to \$1,100 to install the currently authorized camera in a Livery vehicle. This cost acts as a barrier of entry, creating a huge competitive disadvantage for the Livery sector when an FHV owner is deciding whether to license the vehicle as a Livery or as a Black Car. The TLC's proposed amendments level the playing field between the two sectors and allow Livery who wish to have a camera in their car to do so at a small fraction of what the currently required camera costs.

Last, I would like to address some of the expressed objections to the TLC's proposal. First, it is clear none of them really cares about drivers' safety, or else they would advocate for cameras to be installed in the 92,691 Black Cars rather than leaving it as mandatory for the 3,620 Livery. If keeping it optional for the Black car is good enough for them, so should making it optional for the Livery. Second, these detractors are from the Taxi sector, not the Livery sector, and can't really speak on our behalf. It is clear to me their objection stems from their desire to keep the Livery sector at a competitive disadvantage.

The Livery sector is grateful for the TLC changing the camera rule and we urge the Commissioners to vote in favor of the proposed amendments.

Thank you for listening to me, and I am open to answer any question you have.

Avik Kabessa