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Public Comments from Steven Balinsky

CEO and Co-Founder

The Hub Bicycles

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Prepared for the NYC DOT

Notice of Public Hearing & Opportunity to Comment on Proposed Rules for
Operation of Commercial Cargo Bikes

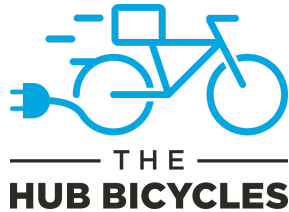
Good morning, I'm Steven Balinsky, the CEO and Co-Founder of The Hub Bicycles.

At The Hub Bicycles, we provide safe, intelligent and purpose built e-bike from the world's leading manufacturers to commuters, delivery drivers, and delivery fleets in NYC.

I'm a New York City native, a graduate of Bronx Science, and I have a deep-rooted love for this city. The Hub Bicycles has partnered with leading organizations such as the Empire Clean Cities Coalition, Equitable Commute Project, and the Trucking Association of New York on large-scale e-bike initiatives, several of which NYC DOT is engaged with. We're not just innovating for innovation's sake; we're creating jobs and shaping the future of urban mobility in a way that I hope my 18 month son will be proud of one day.

Now, let's discuss the proposed regulations that, frankly, could jeopardize the innovative work we're doing, along with the city's and DOT's own goals. Here are the **five key points that DOT needs to address**:

1. **Length Restrictions:** The proposed maximum length of 120 inches simply doesn't align with industry norms for cargo e-bikes available on the market today. It severely restricts industry competition and hamstring DOT's stated goals of quickly scaling the use of cargo e-bikes.
2. **Throttle Restrictions:** Restricting the use of a throttle unfairly limits accessibility for employment opportunities in the cargo e-bike last mile delivery industry, especially for those living in environmental justice communities that need workforce development for green jobs the most.



3. **Payload Capacity:** A cargo e-bike that carries less than 500 lbs is not a viable transition option for most van and truck fleets operating in NYC. DOT should require all cargo e-bikes with 3 or 4 wheels in NYC to be heavy duty and fleetscale ready with a minimum payload capacity of 750 lbs. This payload capacity should be validated through 10,000 mile+ road testing, similar to what the law requires for vans and trucks to be considered roadworthy.
4. **Registration and Insurance:** It should be mandatory for all fleet operators with more than 5 e-bikes to register their fleets with the city and provide proof of insurance.
5. **Fund Rapid Development of Micro Distribution Hubs:** We're investing a lot of our own money to bring the very best and safest e-bikes to market quickly. We urge DOT to move at the speed of industry, by expanding its limited scale pilot project into a long-term program. DOT should co-invest with companies who are ready today to build and operate micro distribution hubs across NYC.

In summary, we're fully committed to common-sense solutions that make cargo e-bike adoption a win-win for our business, our partners, other future-forward companies, and most importantly, the city we deeply love. If NYC DOT can address these 5 key points, we'll be laying the groundwork for an innovative, sustainable, and equitable future in New York City.

Thank you for your time, and we look forward to continued dialogue and partnership with the Department of Transportation.