



New York Department of Transportation (NYC DOT)
Ydanis Rodriguez
Commissioner, Department of Transportation
55 Water Street, 9th Floor
New York, NY 10041

[date]

Commissioner Rodriguez,

On behalf of [Zoomo](#), a global leader in last-mile electric fleet solutions, we welcome the opportunity to provide commentary on the NYC DOT proposed rule to authorize the use of larger commercial pedal-assist cargo bikes. We strongly support and agree with your [statement](#):

"Greater use of cargo bikes will bring incredible environmental and safety benefits for New York City by reducing the number of large, high-polluting trucks on our streets."

We've seen the impact e-cargo bikes have on cities with our operations in the UK and Europe, where pedal-assist cargo vehicles are lowering emissions and transforming urban centers. Zoomo is confident that the recognition of pedal-assist cargo bikes can help elevate New York City to become the global leader in last mile electrification.

We firmly believe that embracing larger cargo bikes in the city's bike lanes aligns with the global shift toward sustainable urban transportation, alleviates the congestion that plagues city streets, and will advance NYC's position as a global leader in sustainability and innovation.

This letter outlines the positive impact of commercial pedal-assist cargo bikes on businesses, delivery workers, and the logistics industry. Given that the proposal from DOT clearly summarizes the sustainability benefits, our commentary focuses on the business benefits and city efficiencies.

For businesses, there has never been a more impactful time to embrace light electric vehicles (LEVs) for logistics. Demand for urban last-mile delivery is expected to grow by [78% by 2030](#), leading to 36% more delivery vehicles in the world's top cities. As this transformation occurs, logistics companies benefit from DOT's proposed rule in the following ways:

1. **Faster and more predictable deliveries:** Cargo bikes offer faster and more predictable delivery in dense urban areas. They both alleviate and avoid traffic congestion and parking difficulties. [Studies](#) have shown that delivery vans spend an average of 9 to 15 minutes

looking for parking spaces. However, rather than look for parking, delivery vans often double-park and idle, which increase congestion and emissions.

2. **Enhanced efficiency:** LEVs like cargo bikes enable goods to be delivered up to [60% faster](#) than traditional vans in city centers, leading to more productive and streamlined operations.
3. **Improved brand reputation:** Cargo bikes are environmentally friendly and align with the growing demand for green logistics. [Research](#) has found that 87% of consumers are more likely to purchase from a company that supports environmental and social issues.
4. **Reduced fines:** Major delivery companies face fines for parking and other road related issues in New York City that can cost them over [\\$30 million](#) per year. Transitioning to cargo bikes can drastically reduce these fines.

[Evri](#), the UK's largest dedicated parcel delivery company, has recently incorporated 15 cargo bikes into their delivery fleet via the Zoomo platform. This has allowed them to navigate narrow London streets, pedestrian zones, and other areas where traditional delivery vans have faced restrictions or difficulty to access.

The regulatory transition to cargo bikes also positively benefits delivery workers. Zoomo puts dignity of the courier at the core of our mission and sees the daily challenges these essential workers face in New York City: traffic accidents, high congestion (both vehicle and pedestrian), uncertified LEVs, and long shifts during harsh weather conditions. Access to cargo bikes break down some of these challenges and provides benefits such as:

1. **Increased access:** The use of cargo bikes enables a wider range of workers to participate in the delivery industry. By reducing barriers to entry (e.g., drivers license requirement), cargo bikes create more employment opportunities across the city.
2. **Increased efficiency and earnings potential:** Delivery workers can increase their productivity and efficiency thanks to the increased capacity and cargo bikes. More packages and more deliveries can result in higher earnings potential for riders.
3. **Increased safety:** Cargo bikes operate at lower speeds with better visibility for operators than vans and trucks in urban areas. A [report](#) found that more than 50% of crashes within NYC between 2019 and 2022 occurred on commercial corridors like truck routes.
4. **Healthier work:** Some companies have [reported](#) that their e-cargo bike riders take fewer sick days compared to traditional delivery drivers, due to the healthier working conditions.

Beyond the benefits to logistics businesses and individual couriers, retail businesses also stand to benefit. Cargo bikes positively impact delivery loading and fulfillment, customer experience, and foot traffic due to their smaller, more nimble size, ability to park anywhere, and contribution to create more pedestrian zones which increases foot traffic around store-fronts.



As outlined in this letter, the use of larger pedal-assist cargo bikes in New York city presents a significant opportunity for the logistics industry, delivery workers and retail businesses. Cargo bikes promise to enhance delivery efficiency and sustainability, and make NYC more liveable and vibrant.

Zoomo fully supports the proposed rule and looks forward to being part of the transformation this will bring to New York City. Thank you for accepting our testimony on this matter. We look forward to the proposed rule changes and are eager to engage in any further discussions as needed.

Sincerely,

Dustin Kerns

North America General Manager, Zoomo

About Zoomo

Zoomo is a full-service commercial micromobility platform founded by Mina Nada and Michael Johnson, on a mission to electrify every urban mile. Zoomo's platform encompasses light electric vehicle hardware (e-bikes, e-mopeds and e-cargo bikes), telematically enabled fleet management software, a global servicing network, and vehicle financing. Zoomo currently operates in Australia, the United States, Canada, the United Kingdom and Europe (Spain, France and Germany).

Zoomo solutions are used by major players in Urban Logistics including UberEats, Doordash, JustEat Takeaway, Amazon, Deliveroo, Domino's, Pizza Hut, Gopuff, Getir, Flink, Purolator, Hived, Evri and more.