

**DISABLED IN ACTION OF METROPOLITAN NEW YORK  
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May 8, 2024

Commissioner David Do  
New York City Taxi Limousine Commission  
33 Beaver Street, 19th floor  
New York, New York 10004  
Via Email to: [tlcrules@tlc.nyc.gov](mailto:tlcrules@tlc.nyc.gov)

Re: Written Comments in Response to the New York City Taxi and Limousine Commission's Hearing on Wednesday, May 8, 2023, at 10:00 a.m. on proposed Flex Fair Pilot Program and amendments to the Taxi Improvement Fund Allocations rules.

Dear Commissioner Do;

Brooklyn Center for Independence of the Disabled and Disabled In Action of Metropolitan New York Inc. submits these comments in response to the New York City Taxi and Limousine Commission's ("TLC") proposed Flex Fair Pilot Program and amendments to the Taxi Improvement Fund Allocations rules.

The Brooklyn Center for Independence of the Disabled ("BCID"), founded in 1956, has been a disability-led independent living center since 1981, dedicated to advancing the independence of disabled New Yorkers in all aspects of the city's life.

Disabled In Action of Metropolitan New York, Inc. ("DIA") is a fifty-four (54) year old, 501(c) (3), grassroots, civil rights organization run by and for people with disabilities. DIA's mission is to eliminate discrimination for people with all kinds of disabilities.

We definitely agree that all TLC drivers need to retake the Passenger Assistance and Wheelchair Accessible Vehicle Training (Re - Training course) at a TLC approved education provider since it has been many of our members experience that numerous taxicab drivers as well as For Hire Vehicles (FHV) drivers do not know how to properly fasten a wheelchair as well as do not know how to fasten a seatbelt and shoulder belt for a passenger using a wheelchair. Further, many drivers are under the erroneous belief that a passenger using a wheelchair has a restraint on the wheelchair and that this is sufficient to protect the passenger during an accident. Finally, many drivers do not assist passengers with low vision or who are blind or who have other disabilities.

Of course, we support having more wheelchair accessible taxicabs on the road. Further, we understand that an extension of the retirement date for wheelchair accessible taxicabs would be one small practical step towards having more wheelchair accessible taxicabs on the road. We nevertheless note that the TLC has not made the taxicab fleet wheelchair accessible and we urge that the TLC do so in accordance with the agreement we made with the TLC many years ago.

Finally, we submit that until at least 50% of the taxicab fleet is wheelchair accessible all licenses for taxicabs should be required to be wheelchair accessible. Further, the TLC should stop issuing licenses to non-accessible For Hire Vehicles that are competing with wheelchair accessible taxicabs.

Thank you for the opportunity to comment on these proposed amendments to the rules since equal access to all New York City's services, activities and programs is important to all New Yorkers. If you would like additional information or have any questions, please do not hesitate to contact DIA at [info@disabledinaction.org](mailto:info@disabledinaction.org) and BCID at [jrappaort@bcid.org](mailto:jrapoport@bcid.org)

Very truly yours,

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