



New York City Department of Transportation
55 Water Street, 9th Floor
New York, NY 10041

August 26, 2024

Subject: Comment on Proposed Rule on Revocable Consents for Battery Swapping and Charging Cabinets

To Whom It May Concern,

We at Portier, LLC (“Uber”) are writing to express our support for the proposed rule change regarding revocable consents for battery swapping and charging cabinets. We are committed to public safety and innovation, and we recognize the value that this rule change will bring to both delivery workers in New York City and to the general public.

Creating more opportunities for individuals to charge batteries in locations known by and certified safe by the Fire Department is a huge step in the right direction for New York City. Allowing installation in a wider range of locations will provide delivery workers and other individuals who use electric bikes with more opportunities to charge batteries safely and conveniently.

As part of this rulemaking, we encourage the City to consider the companies that are already doing this work and have participated in the City’s battery swapping and charging pilot program. Incorporating the insights of these companies will enable the City to create rules that align with existing practices, leading to quicker development and installation. This would benefit both the users of these cabinets and New York City as a whole.

Additionally, while limiting these cabinets to areas with commercial or manufacturing zoning on the ground floor is a helpful and strong step in the right direction, we believe there should be future opportunities to expand installations to all areas of the City, including residential zones. Making these cabinets more accessible to where people live would significantly help advance the City’s goals of becoming emissions-free and fostering a green economy.

Thank you for considering our comments and for your continued commitment to public safety, innovation, and community well-being.

Sincerely,
Hayley Prim
Uber