

Downstate New York



Downstate New York ADAPT  
Website: [dnyadapt.com](http://dnyadapt.com)

December 10, 2024

Commissioner David Do  
New York City Taxi Limousine Commission  
Attention: Office of Legal Affairs  
33 Beaver Street, 22nd Floor  
New York, New York 10004  
Email address: [tlcrules@tlc.nyc.gov](mailto:tlcrules@tlc.nyc.gov)  
Filed at: <https://rules.cityofnewyork.us/rule/wait-time-restrictions-for-fhvs/>

Re: New York City Taxi And Limousine Commission's (TLC'S) Proposal To Amend The TLC Rules To Improve The Wait Time Requirements For The Dispatching Of Wheelchair Accessible Vehicles By Accessible Vehicle Dispatchers And The Reporting Requirements of High-Volume, For-Hire Services

Dear Commissioner Do,

The undersigned disability organizations submit these comments in response to the New York City Taxi and Limousine Commission's request for comments regarding

the TLC's proposal to amend the TLC rules to require that dispatchers serve at least 90% of wheelchair accessible vehicle (WAV) request in under ten (10) minutes and to Require high-volume for-hire services to report on-scene time.

We support the proposed amendments. More specifically, we support this change to the rules which now will require accessible vehicle dispatchers to service at least 90% of all the requests for an accessible vehicles that it receives in under ten (10) minutes. Significantly however, the proposed remains silent as to how soon the other 10% of request for accessible vehicles must be serviced. This is a serious omission. As written, it seems that this other 10% could be served hours later and still be in compliance with the proposed rule. This is untenable since there is no time limit set for this 10% that is not serviced within this 10 minutes requirement.

Our organizations urge the New York City Taxi and Limousine Commission to go even further and require that accessible vehicle dispatchers service 100% of all the request for an accessible vehicle that they receive in under five (5) minutes so that this puts New Yorkers who use wheelchairs on a level playing field with all New Yorkers. Further, we support the new requirement that the time at which the dispatched vehicle reached the pickup location needs to also be noted. By requiring this additional information, assuming it is accurate, we believe the Taxi and Limousine Commission will be better able to determine how quickly New Yorkers who use wheelchairs are being able to receive a ride after they make such a request for a ride. We hope that this will

improve the TLC's ability to compare WAV and Non-WAV wait times and thus, improve the TLC's ability to more accurately analyze how quickly or not New Yorkers who wheelchairs needs are being met by the for-hire industry.

Finally, we urge the New York City Taxi Limousine Commission to require that all new for-hire vehicles be wheelchair accessible vehicles until passengers who use wheelchairs have 100% access to all New York City's for-hire vehicles. When 100% of all New York City for-hire vehicles are wheelchair accessible everyone who needs a wheelchair accessible vehicle will be guaranteed to get a wheelchair accessible for-hire vehicle and this will allow all New Yorkers to travel throughout the five boroughs in New York City with ease.

Thank you for the opportunity to submit this testimony.

Very truly yours,

**Downstate New York ADAPT**

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