Dear Commissioners,

My name is Anna Humphrey, and I am the Transportation Community Organizer for the Center for Independence of the Disabled, New York (CIDNY). Thank you for the opportunity to submit testimony regarding the proposed rule that would increase fines and impose license points on TLC drivers who stop in bus or bike lanes to pick up or drop off passengers. While I appreciate the City’s commitment to enhancing cyclist safety, I urge the TLC to delay this decision until a comprehensive conversation is held with key stakeholders, including the disability community, the MTA, the Department of Transportation, the NYPD, and bicycle advocates. This rule has significant implications for people with disabilities and the drivers who serve them, and without proper adjustments, it may cause unintended harm.

For people with disabilities who rely on wheelchair-accessible taxis (WAVs), paratransit, and broker-provided Access-A-Ride (AAR) services, being let out by the curb is essential. In much of the city, particularly in high-traffic areas, the only available curbside space is within a bike lane or a bus stop due to the large number of cars parked along curbs. If TLC drivers are penalized for stopping in these spaces, it creates an impossible situation where wheelchair users and other disabled passengers will be forced to navigate unsafe conditions just to enter or exit a vehicle. The inability to safely drop off disabled passengers is not only discriminatory but also a direct violation of the Americans with Disabilities Act (ADA) and the City’s commitment to equitable transportation access.

The proposal relies on camera enforcement, which presents a major problem for wheelchair users. Camera images may not clearly show whether a driver is actively assisting a disabled passenger, leading to wrongful fines and penalties for drivers who are simply fulfilling their legal obligation to provide accessible transportation. While we would recommend a wheelchair loading exemption, like the exemption given to paratransit by the DOT, its implementation under a camera enforcement system remains unclear and could result in unfair punishments for drivers assisting passengers with disabilities.

Many TLC drivers are already struggling financially, and this rule could make it even harder for them to operate, especially if they are at risk of losing their licenses due to repeated violations. Some drivers are already reluctant to pick up and drop off passengers at certain locations—such as 375 Pearl St.—due to bike lane and bus stop restrictions. Without designated pick-up and drop-off areas, drivers will continue to be placed in difficult situations, choosing between serving their passengers or risking fines and penalties. Additionally, stopping in a crosswalk is not a safe alternative, but without designated curbside options, some drivers may feel they have no choice.

This issue requires a discussion among all affected parties. Before this rule moves forward, a conversation should be had that includes disability advocates, TLC representatives, DOT officials, MTA representatives, NYPD enforcement personnel, and bicycle advocacy groups. Together, we can find balanced solutions such as:

* Designating specific pick-up and drop-off zones for accessible taxis and for-hire vehicles in high-traffic areas.
* Ensuring a clear, enforceable exemption for wheelchair users and disabled passengers.
* Improving communication between agencies to address enforcement and logistical challenges.

The TLC must ensure that the rule does not unintentionally harm people with disabilities or penalize the drivers who serve them. I strongly urge you to delay implementation of this rule until a proper dialogue takes place with all affected stakeholders.

Thank you for your time and consideration.

Sincerely,

Anna Humphrey

Transporation Community Organizer

Center for Independence of the Disabled, New York (CIDNY)