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September 1, 2025

Interim Deputy Commissioner Irene Figueroa  
Attention: Department of Sustainable Delivery,  
New York City Department of Transportation  
55 Water Street, 9<sup>th</sup> Floor  
New York, New York 10041  
Email address: [rules@dot.nyc.gov](mailto:rules@dot.nyc.gov)  
Filed at: <http://rules.cityofnewyork.us>

Re: New York City Department of Transportation's  
Proposal To Amend Its Rules Regarding Businesses Using  
Bicycles For Commercial Purposes

Dear Interim Deputy Commissioner Figueroa:

My name is Kathleen Collins. I am a native New Yorker who is disabled from birth who uses a wheelchair and has lived in New York City for more than 60 years.

I submit these comments in response to the New York City Department of Transportation's ("DOT") request for comments regarding DOT's proposal to amend its rules with respect to businesses using bicycles for commercial purposes.

I support these proposed amendments. However, I would ask that subdivision (G) (ix) (iii) of Section 10-157 subdivision (d) of the Administrative Code (on page 8 of

the notice) be amended to require that the lettering on the retro-reflective jacket, vest, or other wearing apparel comply with the Americans With Disabilities Act's Accessibility Guidelines such as requiring that the font of the print be large enough for people with low vision to read it and that it have high contrast.

With respect to the pedal-assist commercial bicycles and bicycles with electric assist ("motor assist bicycles") presently they do not provide any forewarning of their approach. Thus, pedestrians, including pedestrians with disabilities, are not provided with enough time to try to avoid these motor assist bicycles when the driver of such a vehicle fails to safely and properly operate the motor assist bicycles. This can result in serious consequences for all pedestrians and especially for a pedestrian with a disability who may not see or hear the motor assist bicycles, as well as for a pedestrian with a disability who may not be able to move quickly, to avoid being hit by such a motor assist bicycle. Thus, the DOT needs to pass a regulation that would require that these motor assist bicycles have a distinctive sound when they are moving. So too, the DOT needs to pass a regulation that would require manufacturers of these motor assist bicycles include technology that 1) prevents these motor assist bicycles from going on sidewalks, 2) regulates the speeds of these motor assist bicycles and 3) requires them to make a distinctive sound when in motion.

Additionally, if not already prohibited, bicycles with electric assist, electric scooters, and other legal motorized vehicles should not be allowed to ride in the bicycle lane and the bicycle lane speed limit should be

strictly enforced. These regulations are necessary because these vehicles (e.g., e-bikes, bicycles with electric assist, and electric scooters) can and do move at the maximum speed at times while manual bikes speed vary greatly. This creates a constant differential in speeds that can be hazardous to all.

Further, we would like to see that the regulations be expanded to include that non-commercial bicycles propelled by human power, a motor, or battery ("Non-Commercial Bikes"), be required to be registered with the New York City Department of Transportation and receive an identifying number which would be displayed on a visible plate affixed to the vehicle. The present regulations as well as these proposed amendments do not address the problems many New Yorkers are experiencing with these Non-Commercial Bikes. These proposed amendments fail to include Non-Commercial Bikes. The regulations ignore the fact that many times these Non-Commercial Bikes travel at speeds above even the speed limit for automobiles and other motor vehicles in New York City and habitually violate basic traffic regulations, such as stopping at red lights and respecting the rights of pedestrians.

Thus, I respectfully submit that we need further regulations that go beyond the existing regulations and proposed amendments to include all operators of bicycles, regardless of how they are being powered or being used (commercial and non-commercial), and require that these operators also comply with the following: 1- take a class on safety and be issued a license plate number after successfully passing the class,

with a renewal requirement every year, 2-register their license number with the DOT and display their license number when operating their bicycle, 3-wear safety equipment such as an approved safety helmet, and 4-maintain proper safety equipment on their bicycle, including sufficient lights, a horn, and sufficient reflectors.

Finally, I agree that we need better enforcement of the DOT's rules otherwise all these regulations will be meaningless. New Yorkers are frustrated, and many are fearful that they will be seriously injured by one of these bicycles, commercial and non-commercial, when walking in their neighborhood and exercising their civil right to travel. Consequently, DOT needs to continue to propose regulations that will balance the desire of many to ride on all types of bicycles while ensuring that necessary safety regulations are promulgated and properly enforced so that New Yorkers will no longer be afraid to walk/wheel in New York City.

Thank you for this opportunity to submit these comments.

Very truly yours,

Kathleen M. Collins