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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/>

Re: New York City Taxi And Limousine Commission's  
("TLC") Proposal To Amend The Following TLC Rules –

1- Wheelchair Accessible Vehicle Conversion, Reference  
Number 2025 RG 005,

2-Cyclist Awareness Decals, Reference Number 2025 RG  
058,

3-Personal Injury Insurance Coverage Requirement,  
Reference Number 2025 RG 057, and,

4-Driver Pay Rule Amendment, Reference Number 2025  
RG 062.

Dear Commissioner Do:

My name is Kathleen Collins. I am a native New Yorker who is a congenital quadruple amputee who uses a wheelchair and has lived in New York City for more than 60 years. I am on the Board of Disabled In Action of Metropolitan New York, also known as DIA, and a Co-Coordinator for Downstate New York ADAPT, two grassroots disability organizations that advocate for the civil rights of all people with disabilities.

I 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 its rules with respect to the following four topics:

1-Wheelchair Accessible Vehicle Conversion, Reference Number 2025 RG 005,

2-Cyclist Awareness Decals, Reference Number 2025 RG 058,

3-Personal Injury Insurance Coverage Requirement, Reference Number 2025 RG 057, and,

4-Driver Pay Rule Amendment, Reference Number 2025 RG 062.

## **1-Wheelchair Accessible Vehicle Conversion, Reference Number 2025 RG 005**

It has always been and continues to be the position of the disability community that all taxis should be wheelchair accessible and that every taxi manufactured for service in New York City should be a wheelchair accessible vehicle. We understand that this is not something that can be done overnight, however, if you don't put a plan into place, it will never be done. Thus, this rule should have some type of requirement that within a certain number of years, such as 3 to 5 years from now, all taxis that are going to be operated in New York, must be manufactured to be wheelchair accessible, like they are in cities such as London, England.

Since we have no such regulations yet, it would seem that allowing more companies to do the retrofitting of taxis to make them wheelchair accessible would increase competition and thereby lower costs of such retrofits. However, we are concerned that the proposed rule amendment does not seem to address what we may be sacrificing by opening such retrofitting to greater competition, such as the safety and comfort of passengers using wheelchairs.

Specifically, the proposal does not address the possibility that quality and safety will be sacrificed if the conversion of taxis to wheelchair accessible vehicles is open to greater competition without proper oversight by the TLC. Thus, we would like to see this proposal to include language that would safeguard against a reduction in quality and safety.

Further, this proposed rule needs to include a requirement that all retrofitted taxis have an all-in-one seat belt and shoulder belt that hangs from the ceiling and hooks into the floor in one smooth movement since this would increase the possibility of a person using a wheelchair receiving a shoulder belt and seat belt, which sadly is not the case presently.

Finally, we would like to see that the Waymo pilot project, just recently approved by the TLC, takes into consideration and studies the ability of these vehicles to recognize wheelchairs, scooters and people with disabilities as well as people who are older. Further, the TLC should promulgate regulations that in the future all electric taxis and for-hire vehicles that roll off a manufacturer's production line be wheelchair accessible and nothing else.

## **2-Cyclist Awareness Decals, Reference Number 2025 RG 058**

With respect to the cyclist awareness decals proposed rule, we agree with the Center for Independence of the Disabled, New York's comment that cyclist awareness decals need to be provided in a format that provides effective accessible communication. More specifically, these decals need to be printed in a large font and have high contrast as well as provide an audio announcement before a passenger disembarks from the vehicle since the person may not be able to read even an accessible decal.

### **3-Personal Injury Insurance Coverage Requirement, Reference Number 2025 RG 057**

I oppose the TLC's proposal to reduce the personal injury insurance coverage that TLC - license vehicles must get to operate a TLC licensed vehicle in New York City. Contrary to the TLC's statement that decreasing the amount of coverage needed from \$200,000 to 100,000 "will better ensure that all road users - drivers, passengers, pedestrians, and cyclists - are quickly and adequately compensated in the event of an injury-causing crash, especially when injuries are significant or involve claims by multiple people" the facts show otherwise.

It seems that the only reason TLC would propose a rule that decreased the amount of insurance coverage a driver or company had to have is to decrease the premiums drivers and companies must pay for insurance and thus, at first blush, it would appear to be a good rule for the drivers and companies. After further consideration, however, we are concerned that the consequences of this proposed regulation would be to increase, not decrease, the exposure of drivers, companies, and passengers alike due to the possibility of more higher costs lawsuits and, in turn, an increase in the time necessary to resolve claims when a passenger sustains personal injuries. With less insurance coverage available to passengers to seek compensation for their injuries and economic losses incurred, injured passengers

will be forced to hire an attorney to recover adequate compensation, and more drivers will be forced to hire attorneys to defend them against these lawsuits. Thus, this proposed amendment does not help anyone and harms everyone.

If the true motivation for the proposed reduction in insurance coverage is related to concerns by the TLC about insurance premiums for drivers or companies, a factor not explicitly stated in the TLC's rationale, the TLC should consider other solutions that do not jeopardize public safety and the ability of a passenger injured in an accident to properly receive compensation in a timely manner. I agree with the alternatives suggested by John Doe, that is, the TLC could investigate the insurance premium structures taking into consideration dynamics within the industry and identify ways to support drivers and companies without jeopardizing coverage for injured passengers, 2-the TLC could advocate for statewide reforms or subsidies that balance affordability for drivers with robust consumer protection ensuring that all are protected, and 3-the TLC could implement safety measures such as enhanced driver training programs, stricter enforcement of traffic rules, and safer manufactured vehicles.

As stated by many other commenters, medical costs are increasing, not decreasing, thus, it makes no sense to reduce the current required insurance coverage for personal injury protection. If anything, the amount of required insurance coverage should be increased since medical costs are only increasing.

It is unfathomable why the New York City Council buckled to pressure from companies such as Uber and Lyft and has totally disregarded the safety of passengers and the increasing need for drivers to be insured against major personal injury and economic damages claims. This change does not address the real issues, such as high premiums and claims of purported fraud. These issues need to be addressed head-on, not by lowering insurance coverage.

It is time that the New York City Council and TLC work with drivers, passengers, and insurers to create better insurance choices, such as some type of pooled or self-insurance that New York State and New York City can help to create and administer. Please do not enact this proposed amendment to the TLC rules.

#### **4-Driver Pay Rule Amendment, Reference Number 2025 RG 062.**

We strongly support the right of drivers to earn a fair, living wage and, to the extent that the proposed amendment to the rules accomplishes this, we support this proposed amendment to the rules.

Thank you for the opportunity to submit this testimony.

Very truly yours,

Kathleen M. Collins