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Monday, December 1, 2025

**BY WEBSITE SUBMISSION / NO HARDCOPY SENT:**  
**<https://rules.cityofnewyork.us/rule/driver-license-and-education-amendments/>**

**New York City Taxi & Limousine Commission**

Attn: Office of Legal Affairs  
33 Beaver Street, 22nd Floor  
New York, NY 10004

**Re: Public Comment on Proposed Rule – TLC-157 “Amendments Relating to TLC Drivers, Driver License Applicants, and Education Requirements”**

To Whom It May Concern:

I submit this comment regarding the proposed amendments under TLC-157. I do so in my capacity as a long-standing advocate in global administrative matters, but more specifically, as a Registered Representative before the Office of Administrative Trials and Hearings (OATH). I routinely encounter the practical consequences of TLC rulemaking through the drivers, bases, and applicants who appear before OATH and through the riders who depend on this system every day. That perspective informs both my support for the goals of this rule package and my concerns about several operational impacts.

**Support: Passenger and Public Benefits**

The package as drafted moves the system in the right direction. The expanded accessibility and disability-service training is long overdue. Requiring drivers who have committed service-refusal violations to complete the new Vision Zero and Accessibility remedial course is a practical and fair approach. It aligns with both the NYC Administrative Code and existing NYS DMV standards, and it closes a long-standing gap in ensuring that drivers understand their legal obligations to passengers with disabilities and their equipment.

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115 Forest Avenue, Unit 61, Locust Valley, NY 11560

The rule's modernization of the Driver License Education Course (including Vision Zero, updated traffic design, defensive driving expectations, device-use restrictions, and customer-service standards) brings TLC requirements up to the level the city's streets now demand. For the passenger, this means fewer safety lapses, better navigation, and a more consistent professional experience.

I also support the clearer rules around license renewal timing, required completion of the education course, and the elimination of the outdated "lifetime experience" exemption. Safety training evolves; the rules should, too. Requiring every driver (new or returning) to be trained under the same standard makes sense.

The clarification of obligations regarding loading and unloading luggage and mobility equipment is another important improvement. Passengers, particularly older adults and those with disabilities, rely on this assistance. The rule makes the duty clearer and easier for the public to enforce.

Finally, the strengthened "fit to hold a license" standard, when fairly applied, is appropriate. A dynamic, ongoing evaluation of driver fitness helps the Commission screen out individuals who genuinely pose a risk to public welfare.

Taken together, the amendments are firmly grounded in the Commission's authority under Sections 1043 and 2303 of the Charter and Section 19-503 of the Administrative Code. They promote safety, accessibility, and public confidence in the TLC-licensed transportation system.

### **Opposition: Liabilities, Burdens, and Unintended Consequences for Drivers**

There are, however, real impacts on drivers that warrant close review before final adoption.

Several of the new requirements increase the likelihood of automatic suspensions. The 60-day deadline for the remedial Vision Zero and Accessibility course (triggered after certain violations) may be too rigid in practice, given that many drivers juggle multiple jobs and unpredictable schedules. The same concern applies to the Portable Electronic Device Course. Suspension for failure to complete the course is understandable, but a short extension mechanism or hardship accommodation would prevent unnecessary loss of income while still preserving the enforcement intent.

The strict limitation on exam attempts (one every 30 days and a maximum of three attempts in a 90-day period) will inevitably result in some otherwise capable applicants being shut out. The intent is good: stronger exam security and higher standards. But without offering additional educational support or addressing language-access disparities, this rule risks excluding applicants who simply need more time or resources; not those who are unqualified.

The requirement that drivers load and unload all passenger property is fair in principle, but in practice, it exposes drivers to possible penalties for refusing unreasonable or unsafe requests. The Commission may wish to clarify what constitutes a “reasonable” request so that drivers are not punished for protecting themselves from injury or for refusing to handle oversized or dangerous items.

Removing the lifetime experience exemption is justifiable, but pairing it with a hard ban on conditional licensure may prolong the time new applicants remain out of the workforce; particularly individuals who previously held TLC licenses in good standing. A narrow, supervised conditional approval system could bridge that gap without undermining the new standards.

Finally, the tightening of misconduct and exam-cheating rules is appropriate, but the new “fit to hold a license” language (if interpreted too broadly) may invite inconsistent enforcement. A clearer statement on proportionality and evidentiary standards would help ensure due process and predictability for drivers.

## Conclusion

This rule package contains important and meaningful improvements (particularly in accessibility, safety training, and service standards) that will benefit passengers and reinforce public trust in TLC-regulated transportation. At the same time, several provisions could produce disproportionate hardship for drivers unless the Commission includes limited flexibility, clearer definitions, or procedural safeguards.

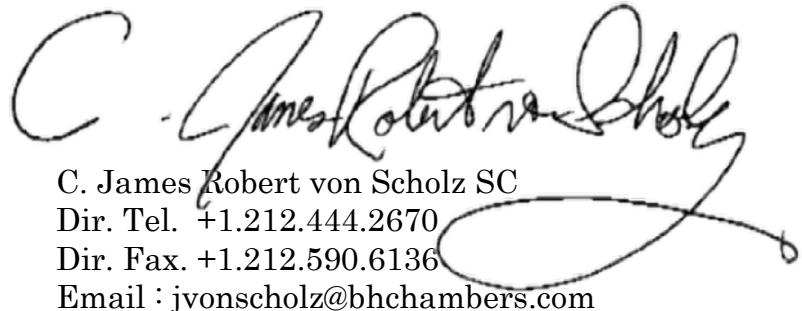
I urge the Commission to move forward with the rules, but to incorporate modest adjustments that will protect both passengers and the hard-working drivers who keep the city’s for-hire transportation sector running.

Thank you for the opportunity to comment.

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Respectfully submitted,



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