Testimony of Ira J. Goldstein
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Before the New York City Taxi and Limousine Commission
Public Hearing on Driver Relief Penalty Reduction

August 13, 2026

Chair Valdivia and Members of the New York City Taxi and Limousine Commission:

My name is Ira Goldstein and I am the Executive Director of The Black Car Fund. For those of you who may be unfamiliar, The Black Car Fund (The Fund) was created by New York State statute in 1999 for the purpose of providing workers' compensation coverage to independent contractor black car drivers throughout New York who drive for The Fund's Member Bases. Over the years, The Fund has grown to over 500 Member Bases and we cover well over 100,000 drivers throughout New York. The large majority of the drivers we cover earn their livelihoods in New York City's for-hire vehicle industry and are directly affected by TLC licensing and enforcement policies.

I submit this testimony in strong support of the driver and vehicle penalty relief provisions in the TLC's proposed rules. I believe the proposed changes are thoughtful and well targeted, as they remove financial penalties while preserving the requirements and suspensions that protect passengers and the public.

As some of you may know, I spent almost 10 years as Chief of Staff at the TLC, so I understand that enforcement is essential to the agency's mission. Rules involving drug testing, vehicle inspections, and license integrity serve important purposes. At the same time, enforcement is most effective when the consequence is connected to the conduct, proportionate to the violation, and focused on achieving compliance. A penalty should protect the public or correct the problem. It should not impose a second hardship when another enforcement measure has already accomplished that goal.

Measures such as eliminating the $25 driver license replacement fee and the $50 fines tied to circumstances such as a lost, stolen, or unreadable license, eliminating the $200 fine imposed when a driver completes an annual drug test more than 30 days late, and eliminating the fines for missed vehicle inspections, while retaining suspension until compliance, are practical reforms that preserve accountability without unnecessary financial punishment.

These changes matter because TLC-licensed drivers and vehicle owners often operate as independent contractors or small businesses. They are responsible for insurance, fuel, maintenance, tolls, vehicle payments or rental costs, licensing expenses, and the everyday costs of supporting their families. A $25, $50, $100, or $200 charge may look modest when viewed in isolation. For a driver who has already been suspended and is unable to work, it can be one more obstacle to regaining financial stability. The larger inspection fines can be even more damaging.

I also believe that licensees are more likely to view enforcement as legitimate when penalties are reserved for conduct that threatens safety, harms passengers, involves fraud, or reflects a serious disregard of regulatory obligations. When suspension already prevents a driver or vehicle from operating until compliance, an additional monetary penalty should have a clear and necessary purpose. In the provisions addressed in the proposed rules, the TLC has reasonably concluded that it does not.

The Fund urges the Commission to adopt these penalty and fee reductions. By removing fines and fees that do not meaningfully add to compliance, the TLC is not retreating from safety or accountability. It is improving the way those goals are enforced. Drivers will remain responsible for meeting drug-testing, inspection, and licensing requirements, but they will not be unnecessarily pushed deeper into financial hardship.

Thank you for the opportunity to provide testimony. I am available at your convenience to answer any questions you may have.