Driver Relief Penalty Reduction, Medallion Relief Program, Undercover Enforcement Practices, and Professional Conduct at TLC Facilities

Submitted to: New York City Taxi and Limousine Commission Office of Legal Affairs 33 Beaver Street – 22nd Floor New York, NY 10004

Re: Request for Meaningful Reduction of TLC Fines, Penalties, Licensing Fees, and Review of Enforcement and Driver-Interaction Practices

Introduction

I respectfully submit this comment in support of the New York City Taxi and Limousine Commission's effort to provide meaningful financial relief to TLC licensees. The proposed Driver Relief Penalty Reduction and Medallion Relief Program presents an important opportunity to address the financial pressures facing TLC drivers, vehicle owners, and small transportation businesses.

1. TLC Licensees Are Small Business Operators

TLC drivers and vehicle owners operate as independent workers or small businesses. Their income depends on maintaining active licenses, vehicles, insurance, and regulatory compliance. A single violation can trigger:

- Fines
- Lost driving time
- Administrative appearances
- Vehicle repair costs
- Insurance increases
- Licensing and renewal expenses
- Inspection fees
- Possible suspension
- Loss of income

These burdens accumulate rapidly and often exceed a driver's ability to pay.

2. Proportionate Penalties

Many TLC penalties begin at **$400 or more**, even for technical or administrative violations. Enforcement should encourage compliance—not impose financial hardship that forces drivers out of the industry.

A graduated penalty structure should distinguish between first-time, corrected, technical, safety-related, repeated, and intentional violations.

3. First-Time Cure Opportunities

TLC should expand warnings, cure periods, reduced penalties, and educational resolutions for first-time violations that do not involve immediate danger.

4. Review of the $252 Driver License Renewal Fee

The $252 renewal processing fee, combined with drug testing and course requirements, creates a significant recurring burden. TLC should consider reductions, hardship options, installment plans, and incentives for clean records.

5. Vehicle Licensing and Inspection Costs

Vehicle owners face substantial recurring expenses, including:

- $550 vehicle renewal fee
- $75 inspection fee
- $800 Commercial Motor Vehicle Tax

These costs should be reviewed and reduced where appropriate.

6. Inspection and Reinspection Fees

Inspection fees should encourage compliance, not impose excessive penalties. Reduced reinspection fees, warnings for minor issues, and clear online guidance would improve fairness.

7. Distinguishing Safety Violations From Administrative Violations

Serious violations should receive strong enforcement. Technical mistakes corrected promptly should not carry penalties comparable to safety violations.

8. Suspension Consequences

Suspensions often cause greater harm than fines. Alternatives should be considered when violations are promptly corrected and do not involve safety risks.

9. Clean-Record Incentives

A Clean Record / Good Standing Program would reward long-term compliance with reduced fees and penalties.

10. Hardship Reduction Program

A formal hardship program should assist drivers facing serious financial difficulty due to circumstances beyond their control.

11. Payment Plans

Reasonable payment plans should be available for drivers unable to pay large fines immediately.

12. Coordination of Government Charges

TLC should work with other agencies to reduce duplicate charges, improve notices, and offer consolidated statements.

13. Transparency and Predictability

TLC should maintain a clear, accessible fee and penalty schedule detailing all fines, cure periods, suspension consequences, inspection fees, and administrative charges.

14. Comprehensive Review of TLC Fees and Penalties

TLC should conduct a broad review of driver, vehicle, and enforcement-related costs to ensure they remain reasonable and proportionate.

15. Undercover Enforcement Operations

Undercover enforcement is important, but penalties resulting from undercover-initiated transactions can reach **$1,000 or more**, even for first-time violations involving no passenger harm.

TLC should provide clearer guidance, proportional penalties, warnings, transparency, airport enforcement review, and aggregate data reporting.

16. Professional Conduct at TLC Inspection Sites and Main Offices

Many drivers report disrespectful treatment at TLC inspection facilities and main offices, including yelling, abrupt commands, and hostile communication.

TLC should implement:

- Professional conduct standards
- Customer-service and de-escalation training
- Clear signage and instructions
- Accessible complaint processes
- Increased supervisory oversight
- Recognition of driver stress and economic pressure

Respectful treatment improves compliance and strengthens the agency's mission.

Conclusion

TLC drivers and vehicle owners are essential to New York City's transportation system. Enforcement should be fair, proportional, transparent, and designed to encourage compliance—not create financial barriers that make compliance unattainable.

I respectfully urge the Commission to adopt broader and deeper reductions in fines and fees, expand cure opportunities, review undercover enforcement practices, and ensure professional conduct at all TLC facilities.