TANY TRUCKING ASSOCIATION OF NEW YORK
3 Corporate Drive, Suite 101
Clifton Park, NY 12065
P 518.458.9696
nytrucks.org

September 1, 2026

Comments of Zach Miller
Vice President of Government Affairs
Trucking Association of New York

Before the

New York City Department of Transportation
Notice of Public Hearing and Opportunity to Comment on Proposed Rules

Regarding

Update provisions relating to commercial vehicle markings to align with federal regulations and allowing for-hire vehicles to park in commercial parking meter areas

Good morning and thank you for the opportunity to share testimony. My name is Zach Miller, and I am the Vice President of Government Affairs for the Trucking Association of New York (TANY). Since 1932, TANY has advocated on behalf of the trucking industry at all levels of government, providing compliance assistance, safety programs, and educational opportunities to our members, and in the process, creating jobs, supporting the economy, driving safety, and delivering a sustainable future.

I appreciate the opportunity to testify on issues related to commercial parking in New York City. First and foremost, we are grateful to NYC DOT for finally addressing the City's commercial vehicle-marking requirements and proposing amendments that would align them with federal regulations and state standards. This change is overdue and will remove a significant administrative burden from the trucking industry.

Under current federal and state regulations, commercial trucks are required to display the legal business name or “doing business as” (DBA) name listed on their USDOT registration on both sides of the vehicle. The name must be displayed in lettering that contrasts with the vehicle’s background and is clearly visible from at least 50 feet away. New York City, however, imposes an additional requirement that commercial vehicles display the company's full address in characters at least three inches high, also on both sides of the vehicle. A vehicle that does not meet this unique local requirement may be deemed an “unaltered vehicle” and therefore ineligible for commercial parking privileges. This can result in carriers receiving multiple tickets, both for failing to satisfy the City's marking requirement and for parking in a commercial loading zone. We applaud DOT's proposal to eliminate this unnecessary and outdated burden, and we urge the Department to adopt this portion of the rule as proposed.

This change becomes even more important as the City moves forward with a pilot program allowing for-hire vehicles to park in commercial metered areas. We ask that DOT explicitly

TANY TRUCKING ASSOCIATION OF NEW YORK
3 Corporate Drive, Suite 101
Clifton Park, NY 12065
P 518.458.9696
nytrucks.org

confirm in the final rule that the pilot is limited to commercial parking within Manhattan's Commercial Business Zone. Limiting the pilot to this defined area will give carriers and enforcement staff a clear and predictable understanding of where these parking provisions apply, while ensuring that any future expansion is subject to its own public review rather than being assumed to follow automatically from this rulemaking.

We understand the need for for-hire vehicle drivers to have safe and lawful places to park. We also recognize NYC DOT's desire to phase out dedicated taxi stands and streamline curbside parking by prioritizing vehicles with commercial markings. To ensure this pilot is implemented effectively, however, several important questions about the availability of commercial parking must be addressed.

DOT has stated that there are approximately 13,000 commercial metered parking spaces and that this number will increase slightly as 288 existing taxi and FHV spaces are incorporated into the commercial parking system.

We had hoped the underlying City Council legislation would require annual reporting on the number and location of commercial parking spaces. Although that requirement was not included, we strongly encourage DOT to require mandatory annual reporting as part of the pilot. At a minimum, this reporting should include:

- A baseline inventory of commercial parking spaces in the Commercial Business Zone as of the pilot's start date;
- Year-over-year changes in the number and location of those spaces, including any spaces lost to other streetscape initiatives;
- Utilization data showing the share of commercial parking occupied by for-hire vehicles compared with commercial trucks; and
- Public access to this data, such as through an online dashboard or map, so that carriers and other stakeholders can track changes in real time rather than waiting for an annual summary.

Our primary concern is not necessarily that taxis and FHVs will occupy all available commercial parking. We fully expect DOT to monitor their use and adjust as necessary. The larger concern is that this pilot cannot be evaluated in isolation from the many other initiatives affecting curb access throughout Manhattan. Bus lanes, outdoor dining, containerized trash collection, bicycle corrals, bike lanes, pedestrian plazas, and other streetscape projects have eliminated, and will continue to eliminate, curb space that was previously accessible to commercial vehicles. Each initiative may serve a legitimate public purpose, but their cumulative effect must be considered when determining whether sufficient commercial parking remains available.

For that reason, we view this pilot as having a broader scope than the proposed rule may suggest. Its implementation presents an important opportunity for DOT to conduct a holistic review of curb allocation within Manhattan's Commercial Business Zone.

As changes to Manhattan's streets continue, commercial vehicles must retain safe, reliable, and predictable access to the curb. Providing adequate commercial parking allows trucks to make

TRUCKING ASSOCIATION OF NEW YORK
3 Corporate Drive, Suite 101
Clifton Park, NY 12065
P 518.458.9696
nytrucks.org

essential pickups and deliveries without contributing to congestion, obstructing traffic, or creating unsafe conditions for drivers, cyclists, pedestrians, and other roadway users.

In summary, TANY respectfully asks NYC DOT to:

1. Adopt the proposed amendment to the commercial vehicle-marking requirement as written, eliminating the City's unique address-display requirement;
2. Confirm that the for-hire vehicle parking pilot is limited to Manhattan's Commercial Business Zone, and treat any expansion beyond that area as subject to separate public review;
3. Adopt mandatory annual reporting on the number, location, and utilization of commercial parking spaces within the pilot area, made available to the public; and
4. Commit to a holistic review of cumulative curb-space loss from bus lanes, outdoor dining, bike infrastructure, and other streetscape initiatives, so that this pilot is evaluated in the context of overall commercial curb access rather than in isolation.

Thank you for the opportunity to comment. As always, the Trucking Association of New York looks forward to continued collaboration and dialogue with the Department of Transportation.