

**Testimony of Meera Joshi
Commissioner and Chair, New York City Taxi & Limousine Commission
Intro Nos. 658, 1080, 1092, 1095 & 1096
City Council Transportation Committee**

February 29, 2016

Good morning Chair Rodriguez, and members of the Transportation Committee. I am Meera Joshi, Commissioner and Chair of the New York City Taxi and Limousine Commission. Thank you for the opportunity to share the TLC's views on Intros 658, 1080, 1092, 1095 and 1096, many aspects of which overlap with existing TLC rules and practice. At the outset, I want to make clear how much we appreciate the committee's ongoing interest in, and support of, our agency, and reiterate our desire to work together to further improve our City's for-hire service. In particular, and although not addressed in the current set of proposals, we hope to also work together where possible on other priority policy areas, such as increased accessibility and accountability across all of our regulated sectors.

Black Car Retirement (Intro 1092)

I will begin with Intro1092 which would eliminate mandatory retirement for black cars as long as the vehicle passes all inspections required by the State Vehicle Traffic Law, the Administrative Code or TLC rules.

The impact of this Intro would be somewhat less than it appears, because the TLC eliminated retirement requirements for most of the black car fleet in the spring of 2015. As background, the TLC first passed a six year retirement mandate for black cars in April 2008. In April 2015, however, the TLC eliminated the black car retirement requirements for Model Year 2013 vehicles and after. At the same time, the TLC also extended the retirement threshold from six model years to seven, for all vehicles that were Model Year 2012 or earlier. Thus the effect

of this Intro would be to eliminate the retirement requirement for the approximately 28% of black cars in service today that are Model Year 2012 or earlier. In contrast to yellow taxi service, where passengers do not preselect a taxi company or a vehicle model, there is no single operational model in the black car industry, and today we see a much greater range of choice for passengers than in years past. With this variety, we agree that applying a single vehicle retirement schedule for all companies is unnecessary due to existing market incentives to replace vehicles at a rate which satisfies customer demand.

Finally, we know that the Council joins us in our commitment to vehicle safety and environmental health, and for that reason it is important to note that all black cars are subject to regular, updated, safety and emissions inspections, so that even if the retirement requirement is eliminated entirely, unsafe and environmentally unsound black cars will be removed from service by the TLC.

Fare Quotes (Intro No. 1080)

The next Intro, No. 1080, would amend the Administrative Code to include a definition to cover app based dispatch in the FHV sector, "Dispatch Service Provider," a concept that the TLC added to its rules last year. In addition, Intro 1080 would require that black and luxury limousine bases, as well as dispatchers operating on their behalf, neither quote nor charge a fare greater than the fare listed in the rate schedule filed with the Commission. TLC rules have long required filing of, and compliance with, rate schedules.

Under the Intro, any passenger who requests it would receive a fare quote. A customer could not then be charged more than 120% of the fare quote. Violations of the rule would result

in civil penalties unless the provider reduced the fare to be in compliance with the 120% provision within ten days.

The TLC has always supported fare transparency as a powerful consumer protection tool; it allows passengers to make informed choices from several different modes of transportation. Yellow and green taxis offer metered fares at published rates, and livery bases must provide a binding fare quote. More recently, in June 2015, the TLC adopted rules requiring the provision of fare estimates whenever a “price multiplier” or “variable pricing,” commonly known as “surge pricing” is used. To avoid sticker shock, these rules require that, upon request, the base must provide a fare estimate in dollars and cents, including any surge pricing, and that the customer must affirmatively accept the estimate to initiate service.

The TLC has begun routine testing of black car bases to evaluate their performance on price transparency and consumer protection. Our testing efforts are intended to ensure that the passenger has affirmatively opted in and accepted variable pricing for all dispatches by black car and lux limo bases, and that whenever requested the passenger receives an estimate of the total fare in dollars and cents inclusive of variable pricing. Additionally, we audit to determine whether rates are properly displayed on any website or smartphone app.

Although TLC rules do not specifically mandate a maximum amount by which an actual fare may exceed the estimate, our rules preventing fraud and misrepresentation provide us with the tools necessary to handle overcharge complaints. And under TLC’s rules, Dispatch Service Providers are required to give passengers a printed receipt directing them to contact 311 with complaints. Nonetheless, while the requirement of a fare quote partly overlaps with existing TLC regulation, and while we believe that market-driven customer service concerns will largely prevent companies from charging above a fare estimate, the TLC does not oppose the provision

capping actual fares at 120 percent of the quote. We understand the 120 percent provision applies to all providers of black car and limousine services, not only to those who arrange for transportation by app. We would request that sector-wide application be clarified, so that, as with our rules, the same standards apply to all FHV service providers.

Finally, the TLC does not support the Intro's safe harbor provision, which would allow providers to avoid penalties if they correct a fare overcharge within ten days. The actual mechanics of how the provision would function are unclear and may prove difficult to enforce. More importantly, if the prohibition is important, we believe it should be immediately binding to provide full consumer protection for passengers and include restitution. The TLC always has prosecutorial discretion not to charge if there are mitigating circumstances, but companies that overcharge passengers should not escape having to answer to the TLC for such an overcharge.

Universal License (Intro No. 1095)

Intro 1095 would codify in the Administrative Code the TLC's recent practice of issuing a "Universal License." Until last year, the City offered different drivers' licenses for yellow medallion taxi drivers and for-hire vehicle drivers. Because medallion license drivers had to meet a higher standard, the TLC has long permitted them to drive FHV's, but not the reverse. Until recently FHV drivers have had to obtain an additional medallion license in order to drive a taxi. Last year, the TLC formalized its existing practice with respect to taxi drivers, and upon renewal, issued them all a combination medallion and for-hire driver's license, a "MED-FHV" license. And in December 2015 began providing experienced FHV drivers the option to switch to a MED-FHV license so they can also drive a taxi. I am pleased to note that, since its introduction, over two thousand FHV drivers have received the new MED-FHV license. In this regard, Intro 1095 would align the language of the Administrative Code to TLC's practice and so

we wholeheartedly support these efforts to improve driver mobility and thank Committee Chair Rodriguez for his personal support of this important local law change.

Intro 1095 would also amend the Administrative Code by expanding the existing English proficiency requirement for taxi drivers to all TLC drivers. All drivers “must be able to speak and understand English.” This requirement comes with the proviso, however, that “such an assessment shall not include a written examination.” We believe that the existing requirements serve New Yorkers well by allowing passengers to choose the for-hire service that best meets their needs, including their language needs. In a city with a significant immigrant population, in which for-hire vehicle driving offers employment opportunities for new arrivals, and where some for-hire vehicle service providers may serve those immigrant communities almost exclusively, it is not clear that there is market demand, citywide, for this language requirement.

Additionally, the means by which the TLC would interpret or administer this provision remain unclear, that is, we are not certain how the Council intends for the agency to determine that an applicant is “able to speak and understand English.” Because these licenses are so crucial for so many first generation immigrant families, we would need to work closely with the Council and the Mayor’s Office of Immigrant Affairs to ensure that implementation of this expanded language requirement does not inadvertently harm the newest New Yorkers. At a minimum, the TLC would want to ensure that current licensees are grandfathered in and do not lose their livelihoods by virtue of this expanded language requirement. The TLC looks forward to discussing these policy and operational challenges further with the Council.

Illegal Street Hail (Intro No. 1096)

Intro 1096 would amend the Administrative Code by significantly increasing penalties for green taxi drivers picking up passengers by street hail in Manhattan south of West 110th street

and East 96th street, the “Hail Exclusionary Zone.” The bill would also provide for enhanced penalties for all drivers where those illegal street hails occurred in certain areas within the City, including the airports, the Hail Exclusionary Zone, and the areas around sports stadiums in the Bronx, Brooklyn and Queens.

The sections of the Administrative Code that the Intro would amend with respect to green taxis were added by the State Legislature as part of the HAIL Law, and there may be a State preemption issue to the extent that the Intro would expand or otherwise alter the provision’s scope. Additionally, as to increased penalties for all other illegal conduct, while the Intro amends 19-507 section (b)(1), it does not amend or address the existence of 19-506 section (e), which also empowers the TLC to enforce against illegal street hails, but which would now provide for different penalties. The TLC would need to meet further with Council staff to clarify these issues, as well as to ensure that in each instance the revised penalties provide for a minimum as well as a maximum, so that fines levied are strong enough to be a real deterrent.

Although we welcome additional tools to enforce against illegal street hails, we are unclear why Intro 1096’s first section singles out green taxi drivers for enhanced penalties. Our enforcement experience simply does not support the premise that green taxi drivers are violating the HAIL Law at a rate requiring specific legislative attention. In the beginning of our green taxi program, and in response to complaints, the TLC did several enforcement actions against green taxis picking up street hails in the Hail Exclusionary Zone. Those enforcement actions, combined with public messaging including exterior markings making clear the green taxi’s limited street hail jurisdiction, significantly decreased the amount of illegal green taxi activity, as is born out in our numbers.

For this reason, the TLC's major concern is with livery and black car drivers illegally picking up street hails and unlicensed, or so called "straight plate" operators, doing the same. Unlicensed operators in particular present a serious safety threat to New Yorkers. Their vehicles have not been inspected for safety, they do not carry the proper commercial insurance, and the drivers have not been subject to background checks, including criminal and DMV record checks, as well as ongoing drug testing. In addition to depriving customers of their right to a safe ride, every unlicensed, illegal trip deprives licensed drivers of income, the City and State of revenue, as well as avoiding contributions to make our yellow and green taxis accessible. The TLC regularly enforces against unsafe illegal operators, but, as you are aware, we lost our best tool last October, when a federal district judge ruled that in certain circumstances seizing vehicles used for illegal pick-ups, as authorized under 19-506 of the Administrative Code, was unconstitutional. While that litigation continues we are exploring other enforcement methods. For example, we are summoning for this conduct under provisions of the State Vehicle and Traffic Law where the penalty is suspension or revocation of the driver's DMV license and/or the vehicle owner's registration. Further, under local law, vehicles are subject to forfeiture where the owner has two or more violations in the past 36 months for unlicensed activity. As the federal court decision regarding TLC seizures did not eliminate TLC's ability to seize vehicles that are subject to forfeiture, we are developing a robust plan to utilize this enforcement tool.

Regarding the provision of enhanced penalties for illegal street hails in specified zones, the TLC cannot support the Intro's division of the City into different zones. The most important purpose of the prohibition against illegal street hails is to protect passengers from entering into unsafe cars with drivers that have not been vetted, and to prevent trips that cannot be accounted for if something goes wrong. We believe that passengers citywide deserve the fullest extent of

this protection, not just those in midtown Manhattan, at the airports, Yankee Stadium, Barclays, and Citifield. Notably, a few years ago we testified in favor of a bill sponsored by Council Member Vacca that elevated fines against straight plates to their current levels. So again, we support increased penalties against this egregious conduct and urge the Council to apply the same penalties citywide.

Security/Information (Intro 658)

Intro 658 would amend the Administrative Code to require the Commission to develop a policy on information security and use of personal information, and to make that policy applicable to livery base stations, black car bases and luxury limousine bases. The Intro further specifies that, at a minimum, the policy cover certain described areas such as permitted use and storage of credit card and personal information and trip records. It would also mandatd PCI compliance for credit card payment systems as well as requiring notification of security breaches.

Additionally, the Intro would require the Commission to adopt rules establishing civil penalties of not less than two hundred dollars, nor more than one thousand dollars, for violations of these policies. Because the effective date would be 90 days from enactment, the TLC would have less than three months to evaluate, draft, notice and promulgate any necessary rules.

I note that the Council is not writing on a blank slate. TLC licensees are already subject to a complex set of federal and state laws, as well as TLC rules, governing the use of personal and credit card information. For example, the TLC already requires that all bases that collect private information, as defined by state law, must file privacy and security policies with the TLC that meet industry best practices. Bases must already notify the TLC and impacted parties in the

case of a security breach under the State's General Business Law and under the TLC rules, and bases of course already must comply with all applicable laws. With regard to PCI standards for collection of credit card information, any entity that collects credit card information is already subject to these standards because every credit card company demands it.

The TLC takes these existing safeguards seriously. We are in the process of initiating testing of bases that dispatch rides by app, like Uber and Lyft, to ensure that, if the base collects any passenger information through the app such as a credit card number, name, phone number, address, or email address, it has filed privacy and security policies with the TLC using industry best practices, the key requirement of which is that the data is safeguarded and only used for authorized purposes. Additionally, a base must file any trade or brand names with the Commission that they use in their passenger-facing smartphone apps, so complaints can be linked back to the responsible company. Outside of the TLC there are other enforcement mechanisms in place against market participants to ensure robust security policies. In that regard, I note the State Attorney General's recent settlement with Uber over its alleged breach of State data security law. Against this backdrop of consumer protections, we are supportive of Council's intent to emphasize the importance of privacy and security protections in local law, but we are also somewhat wary of prescriptive codification of testing standards in this rapidly changing field, so we look forward to working with the Council on reinforcing existing protections while also allowing flexibility for future changes.

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Thank you for the opportunity to testify on these bills, and I am happy to answer any questions you may have.

THE NEW YORK CITY COUNCIL COMMITTEE ON TRANSPORTATION

Monday, February 29, 2016

Int. No. 658 - In relation to requiring information security and use of personal information policies for base stations, black car bases, and luxury limousine bases;

Int. No. (LS 3735) - In relation to the retirement of black cars;

Int. No. (LS 3871 & 3944) - In relation to fare quotes for black car and luxury limousine service;

Int. No. (LS 6166) - In relation to a universal driver's license for taxicab and for-hire vehicle drivers; and

Int. No. (LS 6570) - In relation to increasing penalties for accepting a passenger by street hail from a location where street hails are not permitted.

Written Testimony for Uber bases¹

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- I. **Comments on Int. No. (LS 6570) - In relation to increasing penalties for accepting a passenger by street hail from a location where street hails are not permitted; Int. No. (LS 3735) - In relation to the retirement of black cars; and Int. No. (LS 6166) - In relation to a universal driver's license for taxicab and for-hire vehicle drivers.**

We thank Speaker Mark-Viverito for her leadership and members of the Committee on Transportation for their commitment to ensuring that the City's for-hire transportation is safe, reliable, and comprehensive. We are supportive of the above-referenced bills.

- II. **Comments on Int. No. (LS 3871 & 3944) - In relation to fare quotes for black car and luxury limousine service**

We support the legislative intent of LS 3871 & 3944, as this legislation will require a higher level of transparency in the pricing structures of black car bases, luxury limousine bases, and dispatch service providers ("bases and providers") than is currently mandated.

The requirement proposed in Section 19-544(a) would prohibit bases and providers from quoting or charging a fare that is more than the fare listed on the rate schedule filed with the Taxi & Limousine Commission ("TLC"). This rule is already enumerated in Section 59B-23 of Title 35 of the Rules of the City of New York ("TLC Rules").² As such, the Uber bases already ensure that fares charged for completed trip do not exceed the fare listed on their rate schedule filed with the TLC.

Similarly, the requirement proposed in Section 19-544(b) and the first sentence of the requirement proposed in Section 19-544(c) would require bases and providers to allow prospective passengers to

¹ Achtzehn-NY, LLC; Danach-NY, LLC; Dreist-NY, LLC; Dreizehn-NY, LLC; Drinnen-NY, LLC; Eins-NY, LLC; Einundzwanzig-NY, LLC; Elf-NY, LLC; Funf-NY, LLC; Funfzehn-NY, LLC; Grun, LLC; Neun-NY, LLC; Neunzehn-NY, LLC; Schmecken, LLC; Sechs-NY, LLC; Sechzehn-NY, LLC; Siebzehn-NY, LLC; Unter LLC, Vier-NY, LLC; Vierzehn-NY, LLC; Weiter, LLC; Zehn-NY, LLC; Zwanzig-NY, LLC; Zwei-NY, LLC; and Zwolf-NY LLC.

² R.C.N.Y. Title 35 § 59B-23(a), stating "A Base Owner must not quote or charge a fare, or allow a Dispatch Service Provider to quote or charge a fare, that that is more than the fare listed in the Rate Schedule filed with the Commission."

request a fare estimate through a publically-available passenger-facing booking tool, and provide an accurate price quote in dollars and cents prior to booking transportation. This rule is enumerated in Section 59B-25 of the TLC Rules only when black car bases and luxury limousine bases have price multipliers or variable pricing policies in effect.³ We are supportive of requiring such price transparency at all times.

The second sentence of proposed Section 19-544(c) would prohibit a base or provider from charging a passenger who received a price quote more than 120 percent of the price quoted, unless the passenger makes certain changes to the route or the type of vehicle requested. We are supportive of enumerating the instances when bases and providers should not be required to charge a fare within 120 percent of the price quoted, but, in our industry experience, we understand that there are many changes in circumstances which would necessitate such an exception. As such, we request the following edit to that provision (new language underlined, removed language stricken):

"If such passenger agrees to receive such transportation, such base or entity shall not charge such passenger more than 120 percent of the price quoted unless such passenger takes any action to alter the estimated route, including, but not limited to changinges the location of the pick up, destination, number of stops, or the vehicle type requested or requests a route change requiring the payment of a toll."

We are also supportive of the proposed provision in Section 19-544(d) that gives bases and providers up to 10 business days to bring a fare in compliance with Section 19-544(c) after receiving notification of a violation from the passenger or the TLC.

III. Comments on Int. No. 658 - In relation to requiring information security and use of personal information policies for base stations, black car bases, and luxury limousine bases

Data breach reporting is already required under New York State ("NYS") law to three NYS offices: the NYS Attorney General, the NYS Division of State Police, and the Department of State's Division of Consumer Protection.⁴ Additionally, the TLC requires that certain black car bases file detailed privacy and security policies with the TLC.⁵ As such, it is unnecessary for the NYC Council to impose a FHV-industry specific data breach reporting requirement. Further, existing reporting requirements adequately protect consumer interests.

We request the following changes to Int. No 658 (new language underlined, removed language stricken):

§ 19-544 Information security and use of personal information. a. Definitions.

...

³ R.C.N.Y. Title 35 § 59B-25(b)(1), stating "A Base must provide, upon request, an estimate of the total fare in dollars and cents for the specific trip requested, inclusive of all fees and any price multiplier."

⁴ See New York State Office of Information Technology Services: Enterprise Information Security Office, "Breach Notification Law," available at <https://www.its.ny.gov/eiso/breach-notification>.

⁵ See R.C.N.Y. Title 35 § 59B-21(g), stating "If the Base collects and maintains passenger 'Private Information,' as defined by New York General Business Law §899-aa(1)(b), of (sic) if the Base collects and maintains passenger geo-location data, the Base Owner must file with the Commission current detailed privacy and security policies meeting industry best practices."

2. "Personal information" means an individual's y information that can specifically identify an individual, such as name in combination with one or more of the following data elements, when the name and the data elements are not encrypted or redacted; address; social security number, unmasked or non-truncated credit, debit, or prepaid card numbers, together with any other information that relates to an individual who has been so identified, and any other information that is otherwise subject to privacy or confidentiality laws and associated rules and regulations. The display or disclosure of only the last four digits of a credit, debit, or prepaid card number and the name of a driver and such driver's commission license are not deemed personal information.

3. "Security event" means the ~~attempted or successful~~ unauthorized access, use, disclosure, modification, or destruction of information or interference with system operations in an information system.

...

b. The commission shall develop an information security and use of personal information policy applicable to base stations, black car bases, and luxury limousine bases. Such policy shall, at a minimum: ... (iii) require such bases to develop a procedure for reporting to the commission and affected parties ~~observed or suspected security incidents, threats, weaknesses, malfunctions, or criminal activity;~~ (iv) require such bases to use and process personal information provided to the base to which it has access ~~solely for the purposes of performing authorized activities and~~ in compliance with all applicable privacy and data protection laws; ... (vii) ~~require bases to establish a policy regarding the use of passenger trip information, with such policy including but not limited to a prohibition on the use, monitoring, or disclosure of trip information, including the date, time, pick-up location, drop-off location, and route traveled during such trip, except for legitimate business purposes without such passenger's express, informed, and documented consent.~~



TESTIMONY BY JOSE ALTAMIRANO
Meeting of the New York City Council Committee on Transportation
February 29th, 2016

Good morning. My name is José Altamirano and I am proud to be here today representing the hard-working men and women who run independent livery bases across New York City.

For over 40 years, the livery industry has served millions of riders in our diverse communities that have been underserved by other modes of transportation. We employ over 38,000 drivers, many of whom are immigrants and people of color. They function as the backbone in our communities, supporting the local economy and providing reliable services to those who need it.

We believe it is vital that all companies in our industry are held to the same high standards of operation and safety in the interest of the passengers we serve. Thus, we support many of the initiatives that this committee is taking on, including Intro 658, Intro 1080 and Intro 1092.

At the same time, we have concerns with Intro 1095 because while we support a universal driver's license for taxicab and for-hire vehicles drivers, we fear how it may be applied as it relates to some of our older and/or immigrant drivers who have proficiency issues with the English language.

In addition, we strongly oppose Intro 1096 by Council Member Rodriguez - A local law to amend the administrative code of the City of New York in relation to increasing penalties for accepting a passenger by street hail from a location where street hails are not permitted.

As you know, current licensing and street hail regulations already provide defined parameters by which our industry operates. The riding public of our City, particularly in underserved areas, has a long history with livery service and there is a belief that people should have the right to legally hail a cab on their own streets without being punished for it.

While our industry supports enforcement of the current regulations, we believe increasing penalties in an effort to line the City's coffers will not achieve the desired outcomes. It is not about how much the City raises the fines, but how well we can educate the public to eradicate the practice. The responsibility cannot and should not be shifted to the drivers with higher fines. Fines are too high already by TLC rules and the Street Hail Livery Legislation. The City needs to propose a budget that protects all segments of the industry and educate our residents, to help them identify which are the legal, safe and licensed vehicles they can and should use when at home or in the streets.

This in essence would be a more efficient and constructive vehicle for improving the safety and welfare of the riding public as well as the industry we represent.

VIA TRANSPORTATION INC.
PREPARED REMARKS FOR TRANSPORTATION COMMITTEE HEARING
February 29, 2016

Good morning, Council Members. My name is Erin Abrams and I appreciate the opportunity to address you today on behalf of Via, an on-demand ridesharing platform that provides service in Manhattan. Via is a true ridesharing service that aggregates, in real time, multiple passengers travelling in the same direction into a single vehicle. We currently have over 200,000 members and have provided over 3 million rides, the vast majority of which were shared.

We at Via recognize the importance of information security and data privacy. The security of our members' data is paramount. Safeguarding that data is an extension of our goal to provide the safest possible ridesharing experience for our members. We currently have a comprehensive, scalable and reliable Security Policy in place and have implemented a best-in-class security infrastructure that exceeds industry standards in order to fully protect drivers and members' personal data and our business operations.

While we appreciate the spirit and intention of Intro No. 658, we think that certain aspects of the bill could be clarified and amended to be more consistent with existing regulatory requirements. As a threshold issue, each business should be able to develop its own Security Policy that is appropriate to the size and scale of its operations and the unique risks it faces. If the TLC were to mandate a "one size fits all" Security Policy, the upfront costs of complying with such requirements would drive smaller players out of business or make it very difficult for them to compete in the marketplace. It would also be unnecessary, as the risk profile of a global technology company operating in hundreds of different cities and countries is far different than that of a small black-car or livery base operating locally in New York City.

As written, the requirements for bases reporting a data breach would be substantially broader than the existing requirements under New York law. For example, the definition of “personal information” should be revised to include only an individual’s name PLUS social security number, financial account information or another piece of non-public data, in order to make it more consistent with current state law. The bill considers name and address alone to be “personal information,” although such information is almost always publicly available, and does not trigger data breach requirements in any state in the U.S. if they alone are compromised.

Furthermore, the bill’s requirements to obtain a passenger’s “express, informed and documented consent” at multiple points during an ordinary course transaction is unduly burdensome and not practical in an age where consumers value the efficiency and ease of use of mobile apps for on-demand transit. The privacy and data protections currently found in our Terms of Use provide sufficient notice to customers about the potential uses of the data that they share with us.

Finally, the bill requires bases to develop a procedure for reporting to the Commission on “security incidents, threats, weaknesses, malfunctions, or criminal activity,” but it only defines “security events.” The definition of “security events” is extremely broad and not even limited to disclosures of personal information. From a security perspective, telling the Commission about all threats and systemic weaknesses would result in a flood of information that the TLC would be in no position to address or remedy. Disclosing such information to the TLC before bases were able to take steps to remediate the issues would also increase the vulnerability of critical systems, increasing the likelihood of a data breach or malicious activity. Overall, while we appreciate the intent of the legislation, we would encourage the sponsors to clarify and revise the bill so that it is more consistent with the current body of state and federal law on this issue.

With regard to one of the other bills pending before the Council, we at Via have long believed in offering New Yorkers flat fee rides based on a clear and transparent pricing system. To that end, we would support the aim of LS 3871 & 3944, which would require bases and app-based dispatchers to provide price quotes and fare estimates to passengers prior to taking a ride and to publish accurate rate schedules with the TLC.

We would also be supportive of LS 3735, which would eliminate mandatory retirement ages for black cars, as long as they pass inspection. While we may have internal standards for vehicles dispatched from our platform that may be higher than the TLC requirement to renew a black car vehicle license, as long as the vehicle is safe and clean and meets inspection requirements, we would appreciate the flexibility and opportunity to have drivers on our platform with well-maintained later model vehicles.

With regards to LS 6570, we understand the reasons for prohibiting FHV's from accepting street hails, and the associated penalties for doing so. However, we note that some of our driver partners have reported that they have received illegal street hail citations when they have accidentally picked up the wrong passenger when responding to a lawful electronic dispatch. The average FHV driver could not afford to pay a single one of the substantially increased fines proposed by the bill. In order to protect FHV drivers' livelihoods, we respectfully suggest that any legislation that increases the fines for illegal street hails also provides for an effective and straightforward mechanism to appeal the fines, with or without the assistance of counsel.

We look forward to continuing to work with the City and the Transportation Committee to implement constructive solutions to the important issues facing the transportation sector in New York City. Thank you for your time today.

Testimony Prepared for Berj Haroutunian Regarding Intro 1092: Mandatory Black Car Vehicle Retirement

Speaking Time: Approx. 5 Minutes

Good morning/afternoon. My name is Berj Haroutunian and I am President of the Black Car Assistance Corporation, as well as the Black Car base Vital Transportation. I first wanted to thank the Council for taking the time to hear from me today in support of eliminating the mandatory Black Car vehicle retirement rule, and for the continued shared interest in making the Black Car industry fair, and increasingly safe, for all. Vital Transportation is a co-op owned and operated base with approximately 300 affiliated individuals. Just as Vital Transportation is an invaluable source of income for more than 300 men, women and their families; it is also one of the more than 25 base members with approximately 5,500 vehicles represented by the Black Car Assistance Corporation. Also, these 300 plus employees of Vital Transportation are not just drivers, but the administrative, call center and clerical staff, as well. Even I started in the industry as a medallion owner-driver. Now, let me give you a brief background on the Black Car Assistance Corporation, or "the BCAC". The BCAC was formed in 1991 to serve as the unified voice of the Black Car base operators and its affiliated drivers that serve New York on a daily basis. One issue of significant importance is exactly what we're talking about here today - the elimination of the mandatory Black Car vehicle retirement rule.

This rule, which came as part of an effort to lower carbon emissions industry-wide under the banner of PlaNYC 2030, was supposed to go into effect for Black Cars on January 1st of 2009. In December of 2008, the Taxi and Limousine Commission deferred its implementation for a period of one year due to the massive economic downturn facing the country, and the crippling effects it had on the Black Car industry; and they didn't just defer it for one year. It was deferred yet again in 2009 as it related to 2010. Deferment aside, we must recognize the fact that even

though Black Cars, liveries and luxury limousines were cited in the PlaNYC 2030 initiative, the Black Car industry is the only one that walked away with a mandatory vehicle retirement rule on the books. This is why no deferment occurred for the livery and luxury limousine industries – there simply was nothing for the TLC to defer implementation of! The economic downturn, however, did not just impact the Black Car industry – it impacted the financial industry as well. The financial partners the City had lined up to assist in the financing of new fuel efficient vehicles were now unable to commit to such an endeavor, and that incentive was now gone making the financing of these new vehicles a dismal, at best, possibility. All we want is a level playing field, which is something we cannot have as long as this archaic and un-balanced rule is in place.

For a moment though, let's shift gears here and look at a reason, other than inequality, that this rule is redundant. The Black Car industry is one of intense competition. We depend on high levels of ridership, sure, but not just that. What Black Car bases also value very highly is customer retention. If a base fails to live up to their customer's high standards, that customer will simply call another base and find high quality service elsewhere. Black Car bases know that, and for that reason, it is in the best interest of drivers and bases **themselves** to constantly update their fleets with the newest and, quite frankly, most impressive vehicles available. Let me tell you about something my base, and most others do internally to ensure the highest standards of quality control. We have things called Security Committees which regularly inspect affiliated cars for compliance with our high level of vehicle standards. Should a vehicle fail our internal quality inspection, the driver of that vehicle is fined by his fellow drivers. This is not because of any city requirement; this is because the vehicles affiliated with our bases are representations of our business as a whole.

Now, in anticipation of the passing of this bill, I would like to suggest that the proposed 120 day period be shortened. While the TLC has suspended enforcement action pending the passage of this bill, three months could result in hundreds, if not thousands of drivers having to replace their vehicles unnecessarily. In the current market, many drivers simply do not have the financial means available to them to purchase a new work vehicle. So long as a vehicle can pass the state-mandated safety and emissions inspection three times annually, as well as the mandatory TLC vehicle inspection once every two years, there should be no reason it isn't allowable for service as a Black Car.

Again, I would like to thank the Council for taking the time to hear me voice my opinions on this matter, and I fully trust that the Council will see the logic in the statements I have made here this afternoon. Furthermore, I would like to thank Council Member Rory Lancman for introducing this bill, as well as the Council for hearing our concerns. I would also like to extend my thanks to TLC Commissioner Meera Joshi for suspending enforcement on this issue in anticipation of the passing of this bill. At this time, I welcome questions.



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Peter M. Mazer

General Counsel

Testimony of Peter Mazer,
General Counsel
Metropolitan Taxicab Board of Trade
Before the New York City Council Transportation Committee
February 29, 2016

Good morning Chairperson Rodriguez and members of the City Council Transportation Committee. My name is Peter Mazer and I am General Counsel to the Metropolitan Taxicab Board of Trade (MTBOT). We represent the owners and operators of more than 5,000 licensed New York City medallion taxicabs. In addition, as part of a recent initiative supported by our membership, we have opened the first-of-its-kind MTBOT Driver Resource Center which provides free legal representation to our drivers and assists them in navigating the complexities of dealing with the City to obtain and retain their taxicab driver licenses.

This City's on-demand transportation system with yellow cabs, street hail liveries, Black cars and for hire vehicles works so well and provides the service it does because we have developed, over the years, clear and consistent rules that we expect all operators to follow. Whether these regulations take the form of real criminal background checks for licensees to protect the public, enhanced insurance requirements, price transparency, or a process for the handling of consumer complaints, these regulations work, and will continue to work as long as all transportation providers are treated equally. This has not always been the case. If there is uneven enforcement of the laws, or an inequitable imposition of penalties, then the quality and integrity of service is compromised.

One major problem that has plagued the licensed for-hire industries has been the continued proliferation of illegal and unlicensed activity. This takes the form of both completely unlicensed and unregulated "cabs," as well as licensed vehicles that engage in activity beyond the scope of their license. This affects all licensed industries, all licensed drivers who play by the rules, and all passengers. I commend the Council for taking this problem seriously, and proposing new, higher fines for such unlawful activity.

However, I would like to offer some suggestions that would strengthen these proposals and face the challenge of eliminating unlicensed for-hire operators who place the public at risk. First, it bears reminding the Council and the public why, in fact, street hail activity by unlicensed operators is illegal. Illegal street hail activity is off the grid; the vehicles are uninsured, and there is no record of the transportation being provided. This leaves passengers exposed to fraud, overcharges, uninsured accident risk and various types of assaults – often with little or no recourse. From a safety perspective, it is equivalent to hitchhiking – with all the

dangers that entails. From a regulatory and business perspective, it is a license to steal from hard-working largely immigrant and minority drivers who play by the rules.

There are so many legal transportation options in New York City - by yellow hail, green hail, phone call, app or account – that even one unenforced illegal street hail is allowing one theft too many. And more importantly, unenforced illegal street hails places passengers at great risk.

We support Intro 1096, which increases penalties for illegal street hails in the HAIL zone. However, it must go further. For years, the TLC has been able to seize vehicles operating illegally. As a result of recent litigation, it no longer has the power to do so. However, the criminal court system retains concurrent jurisdiction over unlicensed for-hire activity – provisions of the Administrative Code relating to criminal prosecution for unlicensed for-hire activity should be amended to increase the criminal court sanctioned fines and to make the operation of an unlicensed vehicle for-hire a misdemeanor. This is the best way to protect passengers and drivers.

It is important to remember that while different segments of the for-hire industry serve different members of the public, everyone is entitled to the same public safety as well as equality in the provision of service. Therefore, we support Intro 1095 that would create a universal taxicab/for-hire license since drivers in both segments of the industry should be subject to the same rules with respect to obtaining and retaining a license.

We support fair practices in the TLC regulated industries. As a yellow taxi organization, we support the metered rate of fare and believe it is an effective way to protect consumers from fraud and overcharging. We are unable to increase fares as part of an often-abused anti-consumer trend called “surge pricing” that is popular among a few apps these days. While we are hopeful that Intro 556, which would cap surge pricing and best protect passengers from price-gouging, will one day be passed, today we are hearing a different bill, Intro 1080, which relates to fare transparency. We support this effort in addition to 556.

However, we urge the Council to revisit certain aspects of Intro. 1080, for the following reasons: A taxicab driver must charge the metered rate of fare. A driver who overcharges a passenger by more than \$10 faces the mandatory revocation of his/her license. However, under these introductions, a for-hire vehicle driver who charges a passenger well in excess of the fare quoted by the base will only be subject to a fine, even though this driver engaged in the same misconduct as the taxicab driver. Indeed, I urge that all of penalties for each form of misconduct prohibited under section 19-506 of the Administrative Code, whether it be a passenger refusal, an overcharge, a refusal to transport someone with a disability, or a prohibited unlicensed activity, should be subject to the same penalties and prosecuted and enforced in the same manner.

This set of bills represents an important first step in ensuring public safety and consumer protection, and demonstrates a recognition of the seriousness of unlicensed and illegal activity.

COMMITTEE FOR TAXI SAFETY
54-11 Queens Blvd.
Woodside, NY 11377
718 779-5000

Good morning Chairperson Rodriguez and members of the Council Transportation Committee. My name is David Beier. I am the President of the Committee for Taxi Safety, an industry group whose members manage approximately 20% of the industry's medallions.

We thank the Council for the opportunity to present comments concerning legislation for the for hire industry.

We applaud the Council for proposing these regulations which we hope are the start of implementing rules to regulate and ensure that all segments of the for hire industry are treated equally. As the regulatory scheme presently exists, the medallion industry is unable to compete, not because there is a better product available to the public, but because of the lack of a level playing field, as there are different regulations that apply to the two segments of the for hire industry.

We have repeatedly asked why Uber and not the yellow taxi industry gets to set its own fares, gets to impose on the public surge pricing, why Uber has no accessibility requirements even though it has 33,000 vehicles on the road, why Uber does not pay MTA tax, why Uber's vehicles do not have partitions to protect both the public and the drivers, why Uber gets to choose virtually any vehicle it wants, why Uber's vehicles are not branded in the same manner as are yellow taxis and green outer boro vehicles.

We have repeatedly asked why Uber drivers do not receive wage protection as yellow medallions drivers do, why Uber is allowed to determine what percentage of the fares it takes from drivers when the yellow medallion segment cannot, why Uber is allowed to charge drivers any amount for purchasing a car when the yellow medallion industry has specific lease caps and transparency in its leases, why Uber is allowed to let its drivers drive up to 19 continuous hours putting the public and its drivers at risk, why Uber gets to deal with its drivers without oversight when its professed goal is to replace drivers with driverless cars, making drivers nothing less than a temporary commodity. Uber has made it clear that it cares more about its financial bottom line than the welfare of its workers. Uber's disregard for its workers should serve as an important reminder of why numerous driver protections, including strong wage protections, already exists in the New York City taxi industry.

Taxi regulations have been developed over 50 years to protect both the public, the driver and all industry stakeholders, and yet those same regulations do not apply to Uber.

In Intro 1080 this Council proposes that when Uber and other e-hail services provide a fare quote, the quote itself does not have to be honored, but rather only a price within 20% of that quote. Why shouldn't Uber need to honor the price it quoted? In what other industry is that done? This is bait and switch. We are not suggesting that the price quoted should be honored all day. But surely for a reasonable period of time, that price must be honored.

But then, eviscerating the bill itself, this intro provides that if Uber or other car services get caught not honoring a price that is 20% above the price quoted, they simply need to refund the difference. Accordingly, the intro provides there is no penalty for a violation. What is the purpose of a regulation if there is no penalty if the regulation is violated? We urge the Council to pass meaningful legislation mandating that Uber honor its price quotes.

In intro 1096 this Council proposes to increase penalties for illegal pickups. Although we think it is imperative that such penalties be increased, those penalties are meaningless if there is no enforcement mechanism. The police are too busy to make this a priority and the TLC is vastly understaffed. Not only do Uber drivers pick up illegally with total impunity, but unlicensed pickups also occur with ever increasing frequency. These cars that are simply black in color. They pick up passengers throughout the City. Nothing is known about the driver or the vehicle itself. Exactly whose car is that unsuspecting passenger getting into? Without branding, without enforcement, this bill will never fulfill its purpose. Anyone can print a sign that says Uber.

Intro 1092 removes mandatory retirement for black cars. Again, we ask why there is a difference in the regulations between black cars and yellow medallions? Black cars now cruise the streets the same as yellow medallions. Why again does Uber get a pass when the yellow medallion industry has specific retirement dates for its vehicles? Why the disparate treatment?

Intro 658 proposes guidelines requiring information security and use of personal information policies for base stations, and black car and luxury limousine bases. We agree that this is a step in the right direction. More must be done to protect the private information of passengers. More than a year ago, Uber hid a data breach for months. The government did nothing concerning that breach.

In closing, we urge this Council to address the double standard that exists between Uber and the taxi industry. We believe this Council has a moral and legislative duty to act by imposing real regulations to create parity between Uber and the taxi industry with regulations to protect the public, the hard working drivers, and all industry stakeholders.

Everyone with a for hire license should have the same responsibilities to provide wheelchair accessible transportation. Council Member Johnson's intro requiring all for hire vehicles to be 100% accessible should be scheduled for a hearing and passed by this Council without delay.

We would welcome the opportunity to further discuss these comments and the proposed regulations.

Thank you.

Taxis For All Campaign

For wheelchair-accessible taxis and liveries in New York City, based upon universal design principles

Members include: Brooklyn Center for Independence of the Disabled • Bronx Independent Living Services • Center for Independence of the Disabled, New York • Disabled In Action of Metropolitan New York • Harlem Independent Living Center • National Multiple Sclerosis Society, NYC-Southern New York Chapter • United Spinal Association • VetsFirst • 504 Dems-North Star • 504 Democratic Club

Testimony of Jean Ryan, Taxis For All Campaign
City Council Transportation Committee, February 29, 2016

I'm Jean Ryan from Taxis For ALL Campaign and Disabled In Action, a member group of Taxis For All. We are a coalition of disability civil rights groups, and we are dedicated to ending disability discrimination in taxis, black cars, and for hire vehicle services. We are the wheelchair users in this room and absolutely none of today's bills concern us!

Two years ago, no thanks to the Council, we won a landmark victory requiring the city's yellow taxis to be 50% accessible by 2020. Federal Judge George Daniels called it "one of the most significant acts of inclusion in this city since Jackie Robinson joined the Brooklyn Dodgers."

But two years later, Uber and Lyft have moved in and our agreement is threatened. Not one of the 36,000 vehicles they operate on the road is accessible. In fact, in meetings with Uber, they've made it clear that they don't care to serve wheelchair users in New York City or across the country.

The Council has the power to change that, but not one of these bills or any other legislation highlighted by the Council in January requires Uber and other companies to serve people like me.

We know that the Council has said its goal is to improve the lives of all New Yorkers. Speaker Mark-Viverito has made it clear over and over again. Last September, she told Next City magazine (<https://nextcity.org/features/view/new-york-city-powerful-council-melissa-mark-viverito>):

"All eyes are on New York. We want New York City to be a model of what could happen across the country....If those policies that are inclusive succeed, it could motivate and generate momentum to try and shift things in the national sphere."

We couldn't agree more. But when it comes to policies that are inclusive of people who are disabled, the Council's shut us out. While we've met with many council members, Speaker Mark-Viverito has never met with the Taxis For All Campaign in spite of numerous requests. Meanwhile, she and her aides have met with Uber repeatedly.

We know that putting off wheelchair access will only make it more difficult and expensive to achieve in the future. Though, in the end, you will have to. This Committee and the Council must:

- 1) Hold a hearing and pass Intro. 749, which would require 100% of taxis – whether they're yellow, black or run by Uber or Lyft – to be wheelchair accessible.
- 2) Urge Speaker Mark-Viverito to finally sit down with the Taxis For All Campaign and start working to include us, as she claims she wants to do for all New Yorkers.
- 3) Join us in fighting S-4280S / S-6090 in Albany. These bills would let Uber do what it's doing in New York City – operate with no accessible service at all.

You have the power to require all taxi and for hire services to be wheelchair accessible. Do you have the moral fiber and will to give us a ride? All we are asking is that you do your job, protect the rights of all New Yorkers, and give us a ride. Thank you.

Comments Submitted to City Council Hearing on Intro 1096, February 29,2016

Submitted by:

Richard Thaler

dthaler@usa.net

Chair Rodriguez and Council Committee Members

Re: Int. No. 1096, a Local Law in relation to increasing penalties for accepting a passenger by street hail from a location where street hails are not permitted

Given the recent unprecedented transformative disruptive changes in the Taxi and FHV Industry, your committee's objective oversight in support of the Taxi and Limousine Commission to stabilize the industry is invaluable.

Regarding Intro 1096, many although not all Taxi and Limousine Commission penalties for rule violations are inherently linked to immediately known, identifiable violations, eg. failure to comply with licensing rules, complaints reported by injured parties. But, in the case of street hail violations, an enforcement agent must first identify each violation for the penalty to be applied where the injured parties due to a loss in business in this case are legally operating FHV Bases and affiliated FHV drivers in compliance with TLC Rules 59B-25(a) and 55-17(a) and the over 6 billion dollar loss in medallion value suffered by the Medallion Taxi Industry. Hypothetically, unless enforcement agents are seated in all FHV's, or alternatively stationed at each of approximately 12,000 street corners in Manhattan, it is not possible to effectively determine industry wide street hail rule violations with only several hundred enforcement agents in order to achieve the prevention of illegal street hails.

For this purpose a passenger monitoring and detection system requirement must be included in the penalty rule in order to enforce TLC Rule 59B-25(a) for street hail prevention. For each passenger entry, the event in real time would be securely transmitted to the FHV Bases' dispatch system's required trip records maintained in compliance with TLC Rule 59B-19 in order to search the trip records and confirm the passengers' legal request for service and the pickup location. Failure to locate and confirm the dispatch record's driver pick up instructions would then determine the passenger entry as an illegal street hail and cause the penalty to be applied.



**New York City Council
Committee on Transportation
February 29, 2016
Testimony Re: Int. No. 658, 1080, 1092, 1095, and 1096**

On behalf of Lyft, we are pleased to provide the following testimony regarding the legislation being considered today.

Lyft shares the Council's desire to ensure that the for-hire vehicle industry provides residents and visitors to New York City with safe, reliable, and affordable transportation. By working with the City Council, the Mayor's Office, the Taxi and Limousine Commission, and countless others, we have done just that - Lyft has provided more than one million rides in New York City since we began operating over one year ago.

Generally, Lyft supports the intent and objectives of the legislative proposals before the Council. We respectfully provide comments which we believe would strengthen and enhance the proposals, and also address Lyft's concerns regarding safety, accountability, and equity. We look forward to further dialogue with the Council on these proposals, and on other ways we can ensure quality for-hire vehicle service throughout the city.

Intro. 658 - In relation to requiring information security and use of personal information policies for base stations, black car bases, and luxury limousine bases.

Lyft supports the goals of Intro. 658. We share the Council's concern over data security and personal privacy; our commitment to customer service requires a strong and comprehensive user data policy that protects all our passengers. To that end, Lyft has developed a user data policy that is posted on our website and included in our Terms of Service.

We believe that Intro. 658 could be strengthened as follows. First, the legislation should apply to all bases within the for-hire vehicle industry to ensure that there are no loopholes when it comes to protecting user data. Second, by referencing the New York State Information Security Breach and Notifications Act, which establishes a definition of "personal information" and provides some relevant guidance on the matter of data security, the proposal would be more consistent with existing state standards. Third, clarifying that the legislation does not require publication of data or information that would constitute an unwarranted invasion of personal privacy, trade secrets, or information otherwise exempted from disclosure by state or federal statute, including but not limited to the New York State Freedom of Information Law, would further protect for-hire vehicle passengers' rights of privacy. Lastly, identifying the Department of Information Technology and Telecommunications as the lead agency charged with implementing Intro. 658, given the agency's resources, bandwidth, and relevant subject-matter expertise, would aid in the bill's implementation.

Intro. 1080 - In relation to fare quotes for black car and luxury limousine service.

Lyft supports the goals of Intro. 1080. We share the Council's concerns about consumer protection, and remain committed to providing excellent customer service. It is for that reason that Lyft currently exceeds the TLC's requirements in order to provide a number of innovations previously unavailable to for-hire vehicle passengers: Lyft's website offers a comprehensive breakdown of our fares, including the base-fare, per-minute and per-mile fares, and all other fees and fare multipliers; Lyft offers passengers upfront fare certainty through our carpooling service, Lyft Line, which currently accounts for nearly half of all Lyft rides in New York City; Lyft provides a detailed digital receipt after each trip, with a link and

information on how to request a price review from the smartphone application, in writing, or over the telephone. As you may know, to the extent that a price review reveals an overcharge, Lyft provides the passenger with a prompt and reasonable reimbursement.

However, Lyft is concerned that Intro. 1080 will have unintended adverse effects on for-hire drivers, passengers, and pedestrians. As currently drafted, the proposed 20% fare cap does not take into account such variables as inclement weather or traffic disruptions caused by extraordinary or unpredictable events (such as concerts or sporting events, or increased security for foreign dignitaries or the United Nations). In order to fairly compensate drivers for their time and service, we suggest that the Council consider applying the 20% fare cap only to longer trips, and to consider providing an exemption for events that could impact a fare estimate.

Under the bill in its current form, drivers will only receive 20% above the quoted fare, regardless of the time needed to safely transport their passengers. For example, for a trip with a fare estimate of \$10, a mere three-minute delay could put a driver over the proposed 20% fare cap. In New York City, such delays are unavoidable in even the best weather and normal traffic conditions. The economic and safety implications from such a scenario, as applied to tens of thousands of drivers across the city, need to be further examined, especially in the context of the important and life-saving data that has been collected as part of the Vision Zero initiative.

Moreover, we suggest that the legislation more thoroughly apply to all bases within the livery and black industry. Passengers should be entitled to the same transparency, accountability, and consumer protections, regardless of whether they telephone a small for-hire base or request a vehicle through Lyft's smartphone app.

Intro. 1092 - In relation to the retirement of black cars.

Lyft takes no position with regard to Intro. 1092. As all vehicles on the Lyft platform are 10 years old or newer, unless otherwise provided by law, the bill is not applicable to Lyft's operations. Lyft will continue to ensure that all vehicles meet our standards for safety, cleanliness, and comfort.

Intro. 1095 - In relation to a universal driver's license for taxicab and for-hire vehicle drivers.

Lyft supports Intro. 1093. We have long advocated for driver freedom and flexibility. We believe that the universal license is a significant first step towards that end, and applaud the Council for making this a priority. Further, we look forward to an ongoing dialogue with Council on additional ways we can serve drivers along these lines. For example, by eliminating regulatory obstacles that prevent drivers in one industry sector from being dispatched by a base from a different sector (otherwise known as "cross-dispatch").

Intro. 1096 - In relation to increasing penalties for accepting a passenger by street hail from a location where street hails are not permitted.

Lyft supports Intro. 1096. Indeed, Lyft's Terms of Service specifically prohibit drivers from accepting street hails. For the safety and security of our drivers and passengers, Lyft's technology is designed to allow passengers to request transportation exclusively through the mobile application, and to only process cashless transactions.

Thank you for the opportunity to submit our comments on these important proposals. Lyft looks forward to working with the Council and staff to ensure that the for-hire vehicle industry continues to provide New Yorkers with the best service possible.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 658 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: ERIN ABRAMS

Address: 10 Crosby St. 2nd Floor

I represent: VID

Address: 10 Crosby St. 2nd Floor

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: WILLIAM GARFELD

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1096 Res. No. _____

in favor in opposition

Date: 2/29/16

(PLEASE PRINT)

Name: Nancy Reynoso

Address: _____

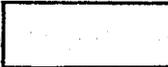
I represent: Green Taxis of New York Inc

Address: 177 Sherman Ave, N.Y.C.

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: David Bejar, President of the Committee for Taxi

Address: 21-03 44th Ave, LIC, NY 11101 Safety

I represent: Committee for Taxi Safety

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 2-29-16

(PLEASE PRINT)

Name: Jean RYAN

Address: 646 77th St

I represent: Taxis for All Campaign

Address: _____

with
ARTHUR Coddishon

**THE COUNCIL
THE CITY OF NEW YORK**

go together

Appearance Card



I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: David POLLACK - TAXI DAVE

Address: _____

I represent: MTAC - Melrose Taxi Action Center

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

go together

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Arthur Goldstein

Address: _____

I represent: Taxicab Service Association

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: OSMAN CHOWDHURY

Address: 43-42-45 ST APT 4G SUNNY SIDE NY 10018

I represent: UNITED TAXI DRIVERS ASSOCIATION

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 2/29/2016

(PLEASE PRINT)

Name: Richard Thaler

Address: 1 Boulder Trail, Bronxville NY 10708

I represent: myself (consultant)

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1092 Res. No. _____

in favor in opposition

Date: 2/29/10

(PLEASE PRINT)

Name: BERJ HAROUTUNIAN

Address: _____

I represent: VITAL TRANSPORTATION

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: JOSE ALTAMIRANO

Address: 220 E 116ST NY NY 10027

I represent: Livery Base Owners

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: PETER M. MAZER

Address: 39-24 24th ST, LIC, NY 11101

I represent: METROPOLITAN TAXICAB BOARD OF TRADE

Address: 39-24 24th ST, LIC, NY 11101

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 1096 Res. No. _____

in favor in opposition

Date: 2/29/16

Name: Rafael Ova-Hes (PLEASE PRINT)

Address: _____

I represent: Boro taxi driver

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 2/29/16

Name: Adalgisa Payero (PLEASE PRINT)

Address: 2301 1st Ave Apt 5B NYC NY

I represent: Taxi drivers of NY

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 2/29/2016

Name: Dr. Jose Basora (PLEASE PRINT)

Address: 2352 Dumby Av. 10473
Brooklyn

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Angel Serrano

Address: 912 Courtland Ave Apt 5H Bronx NY 10451

I represent: Hivery

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Zubin Saleimany

Address: _____

I represent: NY Taxi Workers Alliance

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Bill Lindauer

Address: _____

I represent: NY Taxi Workers Alliance

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Tirso Pina

Address: 625 West 161st St

I represent: HAONY Ignas Council

Address: Grand Central

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Meera Joshi

Address: _____

I represent: TLC

Address: _____

Please complete this card and return to the Sergeant-at-Arms