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**HEARING BEFORE THE CITY COUNCIL  
TRANSPORTATION COMMITTEE  
MAY 9, 2008**

Good morning Chairman Liu and Members of the Transportation Committee. My name is David Woloch and I am the Deputy Commissioner for External Affairs at the New York City Department of Transportation (DOT), and with me here today is Victor Rosen, Assistant Commissioner at DOT's Traffic Operations Bureau. Thank you for the opportunity to be here today to testify on Intro 741 relating to the issuance of New York City Disability Parking Permits.

Specifically, Intro 741 amends the New York City Charter, to mandate that DOT accept the Metropolitan Transportation Authority's (MTA) Access-A-Ride identification card and Reduced-Fare Metrocard, along with a utility bill, as proof of identity and residency for applicants requesting a City Parking Permit for People with Disabilities (PPPD). DOT's Authorized Parking & Permits division issues New York State disability permits to City residents and New York City disability permits to people who either live, work or attend school full time in the City. Currently, applicants are required to produce either a state issued driver's license or non-drivers ID as identification and proof of residency when applying for either permit. States impose strict guidelines relating to acceptable documentation, allowing us the ability to verify the legitimacy of those cards. This is imperative, because as you know, there is a limited amount of available parking in the City. The use of permits by those who do not qualify takes these valuable spaces away from the people who rely on them to conduct their day-to-day activities. In order to protect the integrity of the program, DOT adheres to strict guidelines in issuing disability permits.

In order to qualify for a City Permit, applicants must provide a copy of all vehicle registrations, which must be valid and current, and a completed application which contains a medical history and status section to be filled out by a personal physician certifying the applicant's severe, permanent disability that impairs mobility. Additionally, at Bellevue Hospital or a DOH clinic, a New York City physician designated by the Department of Health must certify the applicant's qualifying disability. As mentioned, to verify identity and residency, a valid copy of a driver's license or non-drivers ID must also be submitted. For applicants who do

not reside in, but work or attend school full time in the City, their employer or school must submit a letter to DOT on official letterhead verifying full-time employment or full-time student status. The letter should be signed by an official of the company, organization, or school and should be embossed with the school seal.

To receive a New York State permit from DOT, applicants must be City residents and have a severe, permanent or temporary, qualifying mobility impairment as certified by a NY State licensed physician or podiatrist. Like the City permit, as proof of identity and residency, applicants must provide a valid copy of their New York State driver's license or non-drivers ID.

In FY 07' there were almost 20,000 New York City Permits and approximately 38,000 New York State permits, issued by DOT, in circulation. State permits can be used to park in spaces marked by the International Symbol of Access as long as the permit holder is traveling in the car. While this does not include on-street parking spaces in NYC, it does include all off-street spots such as in parking lots for shopping centers/malls, office/apartment buildings, and college campuses. City permits, on the other hand, allow parking at most curb site locations in the City – including all No Parking zones except those marked as taxi stands; "No Parking" or "No Standing" spaces authorized for doctors, press, diplomats and government agencies; at parking meters without payment; and in "No Standing, Trucks Loading and Unloading" zones except for specified restricted hours.

As you can see, City permits come with many privileges, aimed at facilitating mobility for disabled City residents, as well as those individuals who work or attend school in the City full-time. Our permit issuing process is deliberately stringent in order to ensure this program serves its purpose and it is essential that the Department does all it can to ensure the legitimacy of permit applications.

MTA issued Reduced-Fare Metrocards and Access-A-Ride ID's along with a utility bill are simply not enough to meet our standards for proving identity or residency. First, utility companies generally do not verify the residency of their customers. They do not confirm the person whose name appears in their records is the same person who resides at the location. Second, the Access-a-Ride ID and Reduced-Fare Metrocard are not authorized proofs of identification. They are not intended by the MTA to be used for this purpose; their sole function

is as fare media instruments to pay for transportation. Far less documentation is required to obtain the MTA-issued cards than to obtain a state issued drivers license or non-drivers ID. In order to receive a Reduced-Fare Metrocard, applicants must show two forms of ID, including one with a photograph. Acceptable documentation includes, but is not limited to, a driver's license or non-drivers ID, passport, birth certificate, or a Medicare card. However, no identification whatsoever is required to obtain an Access-A-Ride ID. Although applicants must have their qualifying disability confirmed by a private doctor, sign a form affirming their application is truthful – they do not need to include any form of identification. Instead, they must apply in-person, to see an MTA certifier, who confirms the claims made by their private doctor. They are also instructed to bring in photos, which will be affixed to their Access-A-Ride ID. Although this process ensures the cards are not transferred, as the applicant who was evaluated must match the photo they provide, it does not verify any of the other identifying information.

The processes to obtain the MTA Reduced-Fare Metrocard, Access-A-Ride ID or a utility bill is just not comprehensive enough to have them serve as sufficient proof of identification and residency for the purposes of issuing NYC disability permits. Intro 741 undermines the Department's efforts to ensure the program is successful in serving the population it aims to protect. In addition to the potential consequences of the bill, amending the City Charter to include each acceptable form of identification to apply for a permit is also problematic. The City Charter is not an appropriate place to enumerate this information. Naming such programs as Access-A-Ride and the Reduced-Fare Metrocard in the Charter is not practical. Should the MTA change requirements for these programs, or even the programs themselves, the Charter would need to be amended.

To conclude, we urge the Council not to move forward on Intro 741 as it has the potential to compromise our NYC disability parking permit program. Although we strive to make the program as accessible as it can be, it is crucial that it works for those who depend on it.

Thank you for the opportunity to testify before you today. We would be happy to answer any questions you may have at this time.