Testimony of Meera Joshi, Chair and Commissioner
New York City Taxi and Limousine Commission (TLC)
New York City Council: For-Hire Vehicle Committee
November 19, 2018

Oversight Hearing: Implementing the Congestion Surcharge Provisions of New York State Law Article 29-C

Good morning Chair Diaz and members of the For-Hire Vehicle Committee. Today I will provide an overview of the TLC's role in the implementation of the New York State Congestion Surcharge that will be required by New York State Law Article 29-C beginning January 1, 2019.

In October 2017, Governor Andrew Cuomo created a Fix NYC Advisory Panel to address congestion in New York City and evaluate potential new revenue sources for the Metropolitan Transportation Authority. The Fix NYC Advisory Panel's recommendations included collection of a Congestion Surcharge on taxi and FHV trips in parts of Manhattan.

In April 2018, as part of the New York State Fiscal Year 2019 Budget, the legislature amended the State Tax Law to create a new Congestion Zone in Manhattan below 96th Street, and to impose a Congestion Surcharge on trips in for-hire vehicles (including taxis, black cars, liveries, and limousines) that begin, pass through, or end in the Congestion Zone.

Beginning January 1, 2019, the New York State Department of Taxation and Finance will assess a Congestion Surcharge of $2.50 per trip in yellow taxis, or $2.75 per trip in For-Hire Vehicles, that is, black cars including the app-based companies and liveries and greens. For Shared Rides the surcharge will be reduced to $0.75 per party. If the passenger requests a shared ride, the trip will be assessed the Shared Ride surcharge even if no other passenger joins. The surcharge does not apply if the trip does not start and end in New York State, or if the trip is provided by or on behalf of the Metropolitan Transportation Authority, e.g., MTA Access a Ride trips.

Under the state law, the obligation to collect the Congestion Surcharge falls on medallion owners and FHV bases, and they are also solely responsible for sending the funds collected to the State Department of Taxation and Finance in a manner to be specified by the State. The State law further requires that bases and medallion owners register as taxpayers subject to the congestion surcharge and file every month a list of all trips on which a surcharge accrued as well as sending them the amounts due for that month. On Friday, the State Department of Taxation and Finance issued Congestion Surcharge guidance for bases and medallion owners in a memorandum available on their website.

The law requires the TLC to cooperate with the New York State Department of Taxation and Finance in the administering the Congestion Surcharge. Accordingly the TLC has consulted with the State Department of Taxation and Finance on how to reflect the state Congestion Surcharge in TLC regulations.

As a result of these conversations the TLC on October 26, 2018 published proposed rules and noticed a hearing for November 28. Notably the proposed rules:

1. Require taximeters and in-taxi technology systems to automatically charge the appropriate Congestion Surcharge when a trip touches the congestion zone and report on the details of each trip that triggers the Congestion Surcharge.
2. Require all FHV bases to charge and collect the applicable Congestion Surcharge, and to report to TLC whether a trip was within the Congestion Surcharge Zone at any point of the trip and therefore liable for the Congestion Surcharge.

Additionally, the proposed TLC rules implementing the new High Volume For Hire Service license created by Intro. 838-C, which TLC also proposed on October 26, 2018, will require all High Volume For Hire Service providers to use in-vehicle GPS devices and report to TLC on each trip that triggers the Congestion Surcharge. These reports for the High Volume For Hire Service providers will include trip route information including when and where a vehicle entered the Congestion Zone during a trip. These rules will therefore require data points that the State has said are necessary to audit returns and payments by owners and bases.

To repeat, the public hearing on these proposed rules will take place at 10:00 a.m. on November 28, 2018, in the TLC hearing room at 33 Beaver Street, 19th Floor. We invite and encourage council members and the public to attend the hearing and provide comments on the proposed rules as we move forward on the rulemaking process required by the City Charter.

TESTIMONY OF
THE COMMITTEE FOR TAXI SAFETY

Committee on For-Hire Vehicles
November 19, 2018

Committee for Taxi Safety
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5411 Queens Boulevard, Woodside, New York 11377

Good morning, Chairman Diaz, and members of the For-Hire Committee.

Thank you for the opportunity to speak on behalf of David Beier from the Committee for Taxi Safety, as well as the men and woman of the taxi industry who provide transportation on New York streets every day.

We strongly urge the City to rethink its current proposal of self-reporting in the for-hire sector which causes a perverse incentive for both for hire companies and for hire passengers which will each benefit from this lack of regulation that, as written, has inherent flaws concerning verification of the number of rides that are subject to the congestion pricing surcharge. One standard for reporting should be applicable to taxis as well as the over 130,000 additional FHV's that exist in New York City today.

Currently, before the taxi cab even moves, passengers pay a $.50 MTA surcharge and an additional $.30 taxi improvement surcharge, which will be in addition to the $2.50 congestion surcharge for every ride in the MTA improvement zone – totaling $3.30 just for government mandated programs. These fees do not include the $2.00 base fare for the meter drop that helps to allow drivers to earn a decent living, but together total $5.30 which as of implementation of the congestion pricing surcharge will be charged to passengers before the taxi even moves.

In contrast, FHV's operating in the City are only required to pay $2.75, a price that is significantly lower – especially for riders' looking to save money on transportation. When one considers that all of the congestion pricing reports have found that the rapid and unchecked increase of for hire vehicles has bene the primarily cause of the increase in congestion, implementing a higher surcharge on taxis whose numbers have remained fixed for several years is totally illogical. As if this imbalance were not enough, New York State law grants a loophole for pool designated vehicles that could reduce this charge to as little as $.75, even if the pool designated trip only has a single passenger from start to finish.

With a 130,000 vehicle supply, there is no reason that companies such as Uber and Lyft won't designate more and more vehicles as pool rides to effectively make for-hire vehicles a cheaper more attractive choice than taxis – with the added effect of actually taking ridership away from the subways and buses. Contrary to New York's stated goals of reducing congestion, this would cause even greater street congestion, the likes of which we have never seen before.

If the disparity that exists in the State law was the only thing that taxi drivers would have to worry about, then there might be some merit in continuing to rely on the TLC's current enforcement methods. However, the fact that taxis are the only mode of transport for which the TLC has mandated an in-vehicle technology system allowing the TLC to have immediate access to trip data from an independent reporting source, has led drivers to seek out the other FHV's that do not have this same method of enforcement. The TLC knows that this is a problem. They have no independent way to verify the information they are receiving through their proposed self-reporting regulatory requirements.

Similarly, the FHV sector refused to pay a sales tax previously imposed by New York State by claiming they had no method to collect the tax from their vehicles, when in fact, they did. They never gave any sales tax revenue to the state. These funds, if collected, could have provided the State with more money to deal with the current crisis that exists in subways. However, the TLC never required data from these services and has allowed the lack of reporting which has resulted not only in under-reporting trips, but illegal pick-ups.

Uber and many other services only report the vehicles they continue to dispatch in New York City that possess a New York license. We have seen a flood of Westchester and Nassau based vehicles, as well as New Jersey and Connecticut licensed vehicles traveling into New York City carrying app-based service's logos. It is unlikely that these services will ever admit to dispatching these vehicles but one only needs to use one's eyes or to ask any enforcement agent watching pickups on city streets and they will attest that they see this often, but are powerless to do anything because they lack the jurisdiction to do so. Even more importantly, because other counties in New York State and other states do not screen their drivers in the same manner that NYC does, this lack of an independent monitor to collect contemporaneous and accurate trip data put the public at risk.

The taxi industry has already paid a very costly license fee for the right to pick up on the streets of Manhattan. Not only did the City do nothing to protect the very licenses it sold, but it allowed for an unlevel playing field of regulations to exist which gave for hire vehicles a huge competitive advantage. As just one example, the taxi industry for years has been implementing a mandated accessibility requirement. No such regulation exists for for-hire vehicles.

The congestion pricing surcharge should be imposed not on us - as we have already paid for this right - but on the ride-share, black and livery cars who, to date, have had no license fee or additional operating costs imposed upon them. At the very least, we should pay equally and report equally.

We ask that the TLC consider revising its polices to match the realities discussed - realities which have lasting impacts on our drivers and the public.

Thank you.

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Before the City Council Committee on For-Hire Vehicles
Concerning the TLC's Implementation of the Congestion Pricing Surcharge
November 19, 2018

Introduction

My name is Charles Komanoff. I have lived in New York City for half-a-century, and for over 30 years my primary professional activities have concerned city transit, traffic and transportation, as "re-founder" and president of the cycling advocacy group, Transportation Alternatives; coordinator of the direct-action street-safety and pedestrian-rights group Right Of Way; and long-time proponent and economic modeler of congestion pricing.

My kaleidoscopic "BTA" Excel spreadsheet model has informed and supported the congestion-pricing advocacy of renowned transportation engineer "Gridlock" Sam Schwartz for almost a decade. Last fall, Gov. Cuomo's "Fix NYC" panel adopted the BTA model as its primary analytical tool for evaluating congestion pricing. The BTA (the acronym stands for Balanced Transportation Analyzer) allows detailed treatment of for-hire vehicles (including yellow cabs, Ubers and Lyfts) that now make up approximately half of all vehicles in motion in Manhattan's Central Business District south of 60th Street, and which are being relied upon as a major source of new funding for NYC Transit.

I have been retained by taxi medallion interests to evaluate the proposed TLC regulations for monitoring, accounting for, and implementing the congestion pricing surcharge.

My primary recommendation is to urge this committee to direct the Taxi and Limousine Commission to mandate, at the earliest possible date, *universal digital connectivity* for all for-hire vehicles. This step, and only this step, will ensure that the FHV surcharges that are scheduled to take effect on January 1 are properly billed and accurately collected in a fair and equitable process that will merit public trust.

Universal digital connectivity for all FHV's will do more than enable accurate collection of surcharge revenue. It will also lay the foundation for congestion pricing reforms that will:

(1) redress competitive disadvantages borne by yellow taxis at the hands of "Transportation Network Companies" (TNC's) such as Uber and Lyft, and
(2) facilitate a transition from the pending flat-fee, one-size-fits-all FHV surcharges to a *congestion-based surcharge* that will improve FHV efficiency, reduce traffic congestion, and generate additional surcharge revenues to support public transportation.

What is universal digital connectivity?

For purposes of this hearing, "universal digital connectivity" denotes continuous Global Positioning System (GPS)-based *streaming data transmission* from for-hire vehicles to a database maintained by the **New York City's** Taxi & Limousine Commission. These transmissions enable the TLC able to observe and record the origin (pick-up), destination (drop-off) and route of every fare trip carried by for-hire vehicles — not only yellow taxicabs but also TNC's such as Uber and Lyft. The TLC can then also monitor movements of FHV's when there is no fare. Not only will this crucial data help inform traffic and transportation planning, it will also allow city and state officials to apply surcharges to "cruising" miles or "trawling" minutes by TNC's that significantly exacerbate traffic congestion.

I base my recommendation for rapid mandating by the TLC of universal digital connectivity on four findings that I develop in the remainder of my testimony.

Finding #1: Universal digital connectivity is needed to assure that TNC's pay fully and reliably into the FHV surcharge fund, commencing on January 1 (2019).

As members of the Council's For Hire-Vehicle Committee know, beginning on Jan. 1, each fare trip in a taxicab / TNC that touches the Manhattan taxi zone (the whole of Manhattan island south of 96th Street) is going to be surcharged $2.50 / $2.75. These surcharges are to be collected as part of the fare and placed in an account maintained by the NY State Department of Taxation and Finance, with the amounts earmarked for transit improvements.

The expected monetary amounts, in excess of one million dollars a day, and approximately $400 million a year, are impressive. However, actually collecting the authorized surcharge revenues will require scrupulous adherence to the surcharge rules by taxi medallion owners and FHV base owners. Their compliance will be enhanced if the owners understand that their surcharge deposits into the state account are being monitored closely, *which the authorities can do only if the for-hire vehicles are connected to the Taxi & Limousine Commission through a continuous data link.*

These connections already exist for taxicabs but not for the TNC's that in just a few years have become high-volume generators of traffic congestion. Pursuant to regulations promulgated in 2004 by the Taxi & Limousine Commission, all 13,587 medallion taxicabs licensed to pick up street hails throughout New York City continuously transmit their location to the TLC. Currently, the connections are primarily implemented through relatively old-fashioned analog systems that are compliant with TLC's TPEP regulations. (TPEP is an acronym for Taxicab Passenger Enhancements Project.) Though not state-of-the-art, these systems nonetheless permit the TLC to reliably monitor taxicab movements. As a result, it is to be expected that the new $2.50 surcharges on taxicab fare trips that touch the Manhattan taxi zone will be recorded, and the surcharge amounts paid, for the vast majority of qualifying yellow taxi trips.

At present, however, no such connectivity is required for transportation network company vehicles (Ubers, Lyfts and Vias). The TNC's do report fare trip origins and destinations to the Taxi & Limousine Commission, but the TLC has no ability to verify the data or ascertain the routing of each trip. This omission constitutes a gaping loophole, one wide enough for any number of the 350,000 daily TNC fare trips that transect the Manhattan taxi zone to drive right through, unobserved and unaccounted for.

What is to stop Uber as a corporate entity or its tens of thousands of drivers from bending the surcharge requirement to their own purposes? This concern is not hypothetical, given Uber's history of gaming rules and regulations. Most infamous, perhaps, was the company's use of "Greyballing," a technique using a denial-of-service algorithm to inhibit government-mandated regulation of Uber in cities and countries around the world. (see, for example, New York Times, How Uber Deceives the Authorities Worldwide," March 3, 2017). The historical record also shows that for years Uber employed an accounting trick that cheated its drivers in New York City out of tens of millions of dollars, until the subterfuge was uncovered by the NY Taxi Workers Alliance.

Without accurate monitoring by the authorities, serious glitches or outright fraud could mar and discredit the new taxi surcharge program. For example, a trip from, say, Harlem to Sunnyside that passed through the taxi zone to cross the East River on the Queensboro Bridge and thus is subject to the congestion surcharge could be represented as having circumvented the zone via the Triboro.

Also problematic is New York State's 75-cent Pool Ride Exemption to the TNC $2.75 congestion surcharge. According to NY State Department of Finance compliance regulations, it appears that the first two passengers traveling together will each pay just 37.5 cents, while a third passenger, if there is one, will also receive a steep discount, paying just

75 cents. A surcharge knock-off of two dollars or more, delivered via a confusing and easy-to-game formula, is ripe for abuse and calls out for rigorous independent monitoring.

No one knows how many of those 350,000 (and rising) daily zone-using trips by TNC's will devolve into "surcharge shortcuts" or "phantom pool rides," as we might term these workarounds. But why leave it to chance? Why allow seeds of doubt over Uber and Lyft compliance to be sowed among the public, among taxicab drivers, and even among conscientious Uber and Lyft drivers? Why risk short-changing the new transit improvement fund dedicated to holding down fares and financing better service?

The answer, of course, is that there is no reason to do so. Instead, ***the City Council should direct the TLC to mandate universal connectivity for all for-hire vehicles as soon as possible.***

Finding #2: Digital connectivity is inexpensive and is readily available.

Until now, connectivity has been a relatively arduous process requiring physical alteration of the vehicle for proper installation. Today, however, new, inexpensive digital technology is available that can wire up every TNC vehicle to allow its trip origins, destinations and routes to be reported continuously to the Taxi & Limousine Commission and recorded by the TLC. The per-vehicle cost is likely to be in the $250 to $500 range.

One company with which I'm familiar, Athena Technology, has installed such a software-based system in several hundred NYC taxicabs. The system, which is TLC-compliant, is housed on smart tablets (e.g., iPads) and uses a GPS taximeter to calculate fares, will allow fleet owners and drivers to dispense with the familiar, bulky (and sometimes balky) analog taximeters. It is installed via a quick process requiring few additional components and minimal changes to the vehicle.

There may be other capable technologies as well, and it behooves the TLC to issue an emergency request for proposals (RFP) to determine the best possible system to connect all FHVs to an independent monitoring system.

Finding #3: Universal digital connectivity will allow fairer and better congestion surcharging of FHV's.

Once all for-hire vehicles — not just yellow taxicabs as at present but also transportation network companies (TNC), i.e., Uber, Lyft & Via vehicles — have been wired with universal digital connectivity, the City and State will be able to replace the first-stage, single-price FHV surcharge system triggered by a fare trip's touching the Manhattan taxi zone, with *granular, proportionate charging based on time traveling in the Manhattan taxi zone*. The result will be a more efficient, effective and equitable surcharge scheme that will benefit all New Yorkers, as I explain.

Let's begin with the obvious fact that a one-size-fits-all surcharge is unwise. Charging no more for "Trip A" that extends five miles or fifty minutes in the taxi zone than "Trip B" that covers just five blocks or lasts a few minutes in the zone is senseless. Trip A obviously contributes ten or more times as much to traffic congestion as Trip B, and should be charged accordingly.

This isn't to denigrate the legislators who, under severe time pressure, wrote the surcharge language into law at the end of the budget season last March. It is meant, rather, to highlight the need to revisit the FHV surcharges in order to get them right. This can be accomplished once all for-hire vehicles have been wired with universal digital connectivity.

We're all agreed that, at least for the time being, FHV surcharges should apply only within the Manhattan taxi zone. The zone is where each additional vehicle, moving or not, piles on the greatest congestion costs; it's also where travel alternatives — subways especially but also buses, bike-share and walking — are most efficient and abundant. Outside the taxi zone, each vehicle's "congestion causation" is lower and travel alternatives are less robust. Sure, these generalizations conceal a lot of variability, but they hold true far more often than not.

FHV surcharging, then, should apply only for trips within the Manhattan taxi zone. In theory, the surcharges could be spread among the "drop" (which is the fare component targeted by the pending surcharges), trip mileage in the zone, and trip time in the zone; that's how I thought about this matter, initially. But rather quickly I came to see that ***not only the simplest but the optimal way to surcharge FHV's is solely according to trip time in the taxi zone.***

Time, after all, is a nearly perfect "proxy" or representation of congestion causation. FHV trips that spend a lot of time in the taxi zone, either because they cover a lot of ground or the streets are congested or both, are by definition *adding to* the congestion experienced by other road users. This makes it both fair and efficient to structure FHV surcharges entirely on the basis of the amount of time — literally minutes and seconds — that the fare trip spends in the zone.

We all understand that any FHV surcharges will thin out traffic somewhat by reducing use of yellow cabs and TNC's. Earlier this year, I performed some calculations that suggested that, for the same total amount of surcharge revenue, switching from the pending single-charge FHV surcharges to a surcharge system based on fare-trip time in the zone will expand the prospective easing of traffic congestion by 25 percent. That translates into 4,000 additional saved hours a day for NYC drivers, truckers and bus riders. The time-in-the-zone surcharge will also preserve an estimated 25,000 TO 30,000 daily FHV trips in the face of the price disincentive from the surcharge. That's because a time-based surcharge does more to speed traffic flow than the one-size drop-based surcharge, thus retaining some of the attractiveness of taking an FHV.

To sum up this point: ***universal digital connectivity will enable an improved FHV congestion surcharge system — one that will do more to improve traffic flow and preserve the financial viability of the for-hire vehicle sector than the pending regime in which each trip using the taxi zone is charged the same.***

Finding #4: With universal digital connectivity, New York State will be able to charge FHV's for the socially damaging idle time they spend within the taxi zone.

There is a further way in which time-based charging employing universal digital connectivity can lead to improved FHV congestion surcharges. That is to *surcharge TNC's additionally for time they spend between fares in the congestion zone.*

This simple but revolutionary change can, I am convinced, further a host of important public policy objectives:

- Surcharging TNC's for elapsed time between fares in the congestion zone can reduce "trawling" (TNC's waiting in the taxi zone to be pinged) that is now severely worsening traffic congestion.
- This supplemental TNC surcharge will motivate TNC drivers to spend more time outside the taxi zone, where the mobility service they provide confers a greater societal benefit (from expanding travel alternatives) and imposes fewer societal costs (in terms of congestion causation).
- Surcharging TNC's for elapsed time between fares in the congestion zone can effectuate much and perhaps all of the reduction in cutthroat competition among FHV drivers that the City Council's moratorium on new TNC's is intended to achieve.
- This supplemental TNC surcharge can also redress some of the competitive imbalance between TNC's and yellow taxicabs that is undermining the livelihoods and wrecking the lives of thousands of medallion owners and taxicab drivers.

These important objectives can all be accomplished with an easily administered embellishment of the time-based surcharge I outlined earlier here. The differences are that (1) this additional variation would be applied to minutes and seconds that TNC's spend in the Manhattan taxi zone *without a fare-paying passenger*, and; (2) it would apply only to TNC's (Ubers, Lyfts, Vias) and not to medallion (yellow) taxicabs.

To distinguish this surcharge embellishment from "cruising," I call it a "trawling" charge. *Cruising* denotes a vehicle in motion — literally a taxicab driving up and down an avenue or street looking for a hail. *Trawling*, in contrast, denotes a vehicle waiting to be pinged — an Uber or Lyft hanging out in the zone, awaiting notification that a customer wants a ride.

Cruising obviously adds to traffic congestion. It took some time for traffic analysts, myself included, to come to grips with the reality that *trawling* also adds to congestion. Early on, some of us had the hope that the gap in distance and time between a TNC letting off its last passenger and collecting its next one was zero, or nearly so. This may have been the case at the outset, but it is obviously not so at present.

At almost any given moment, thousands of Ubers and Lyfts sit idle in the Manhattan taxi zone. Either they occupy precious curb space and thus force delivery vehicles and tradesman's vans to double-park, or they double-park themselves, blocking traffic and pushing people on foot or bikes out of crosswalks or lanes and into traffic. Exactly how many TNC's are gumming up the works in this way is unknown because, *without universal digital connectivity, the authorities have no means to track TNC movements and measure how many Ubers and Lyfts are trawling in the zone.* Nevertheless, it's beyond argument that TNC's waiting to be pinged are adding significantly to today's worst-ever congestion.

Note that the trawling charge does not have to be the same as the surcharge for time with a fare. By way of example, if the peak surcharge rate for taxicabs and TNC's is set at 40 cents per minute in the zone with a fare, the additional trawling rate for TNC's could be set at half of that level, or 20 cents per minute during peak times. (As it happens, I estimate that, on average, each minute that a TNC trawls in the zone, i.e., sits around between pings, its occupation of physical space costs other travelers in the aggregate an average of 40 cents a minute by slowing them down; this suggests that a 20 cents/minute trawling charge for TNC's is eminently reasonable.)

It is logical to expect that charging TNC's for trawling would substantially reduce their presence within the taxi zone, provided the trawling charge is set at a socially appropriate level, i.e., one that internalizes a substantial share of the social-congestion cost. Assume, for the moment, a peak-period trawling charge of 20 cents per minute, and also assume that TNC utilization rates in the taxi zone average 60 percent (per Bruce Schaller's Dec. 2017 report, "Empty Seats, Full Streets," p. 6). Then for each hour in the taxi zone, a TNC driver can expect to fork over nearly $5 (calculated as 20 cents/minute x 60 minutes/hour x 40% idle time, yielding $4.80/hour).

That's a fairly strong price signal — one that will inevitably bring about a substantial reduction in the number of Ubers and Lyfts gravitating to the taxi zone. The result will be higher earnings for FHV drivers as a whole, for two reasons: fewer of them will be chasing the same number of fares in the zone, and the number of fares will increase somewhat due to reduced traffic congestion. With these economic incentives, TNC supply that currently congests the taxi zone will become more widespread outside, providing wider availability of transit to the outer boroughs and underserved areas of Manhattan — something that Uber prides itself on.

Last, why charge TNC's for trawling but not yellow cabs? Simple. The number of medallion cabs is capped by law (at 13,587). In contrast, the recently imposed cap on TNC's — a textbook case of closing the barn door after the horse is gone — does not directly limit the number of TNC's that may operate within the taxi zone. It therefore is unlikely to relieve either Manhattan congestion or the race to the bottom by which FHV drivers plunder each other's pocketbooks by competing for the same pool of taxi-zone customers. In comparison, the incentive to steer clear of the taxi zone provided by the proposed TNC trawling fee, while perhaps subtle, can be calibrated to be more effectual than the blunt-instrument cap.

Thank you for the opportunity to present this testimony. I look forward to advising the committee and/or individual members at your convenience.

FOR THE RECORD

November 19, 2018

Honorable Reverend Rubén Díaz, Sr.
Chair, New York City Council Committee on For Hire Vehicles
250 Broadway, Room 1804
New York, NY 10007

RE: Proposed TLC Congestion Surcharge Rules

Dear Honorable Reverend Diaz, Sr., and Members of the Committee on For Hire Vehicles:

This past April, the New York State Governor and Legislature passed a congestion pricing plan in the New York State budget. The plan calls for a surcharge on certain vehicular traffic in Manhattan that occurs below 96th Street. The New York City Taxi and Limousine Commission ("TLC") is tasked with developing and implementing regulations to administer this surcharge, which is $2.75 per trip operated by For-Hire Vehicles. As outlined below, the Livery Base Owners ("LBO") agrees with certain aspects of the proposed regulations, and seeks amendments to other sections.

By way of background, it is important to point out that the State of New York is expecting more than $400 million dollars in fees each year as a result of this surcharge. Those fees are to be assessed directly to the passenger, everyday New Yorkers and visitors, who will be taxed simply because they needed a ride into certain parts of Manhattan. As originally conceived, the surcharge would be collected directly by the State through the use of an automated vehicle tracking system installed at certain points throughout Manhattan. However, the State failed to appropriate the funds necessary to implement that system. As a result, the TLC must come up with a cost-effective scheme to collect the State's revenue.

LBO is encouraged that the TLC has not proposed a requirement of a TPEP / LPEP system to track each affiliated vehicle. Those systems are costly to install, administer, and maintain. As currently written, the rule mandates that bases will report and collect fees based trip logs. *This aspect of the proposed rule should not change.*

Unfortunately, the TLC's proposed rule does not provide adequate protections to the bases. Each base is required to report trips, collect payment from the driver, aggregate and hold those payments, and then regularly submit those payments to the State. It is the bases that will be responsible for submitting the proper amount in a timely manner. And, it is the bases who will be fined or otherwise penalized regardless of whether or not a driver has remitted the passenger's surcharge to the base. Essentially, under the proposed rule, the base is incurring all of the liability for the surcharge, despite the fact that it is the driver who collects the money directly from the passenger.

To correct the imbalance and inequity in the proposed rule, the LBO recommends the following amendments to the TLC's proposed rule:

1. Allow bases to collect an administrative fee; and
2. Authorize bases to have the ability to charge interest on any surcharges paid by the base that the driver has not yet remitted; and
3. Allow the TLC to fine / penalize drivers who repeatedly remit late surcharge payments.

These common-sense rule amendments will ensure that the drivers comply with the proposed surcharge. And, these changes will protect the bases from exposure / insolvency that may result from those who don't follow the rules.

Thank you for the opportunity to voice our concerns to the Committee. We remain partners with you and other stake-holders in the For-Hire Vehicle community in ensuring that the people of this great City can enjoy safe, reliable transportation solutions.

Respectfully Submitted,

Jose Altamirano

Testimony of Carolyn Protz at For Hire Vehicle Committee of the NY City Council

On Congestion Surcharge   November 19, 2018

As a medallion owner, I am once again mystified as to why my own government, in this case New York State, would seek to make what is already a horrific situation, even worse. After 8 suicides it's hard to believe that you and they are even considering a new burden on the industry. The additional $2.50 surcharge represents a 17% fare increase, which is untenable at this time, due to the huge increase in for hire vehicles all competing for the same passengers. It would also preclude any future raises indefinitely as this would cause further erosion of our market.

The problem of congestion is not caused by passenger cars or yellow cabs. That's been acknowledged by all the experts who have examined the statistics. Every year there are less passenger cars entering Manhattan. There are approximately 2,000 less yellow cabs on the road doing 50% less trips than in 2011.

The reason we have congestion is not for the lack of congestion surcharges.

The reason we have congestion is that there are too many for hire vehicles on the road. And the congestion is everywhere in this city – not just in Manhattan. This is the one issue that no one is doing anything about. To someone outside of government this seems like downright insanity.

So what's to be done. Remove some of the for hire vehicles? No, instead, this congestion surcharge punishes yellow cabs, which I would like to remind you, are MANDATED to be on the road. Unlike app cars, it's not elective. As yellow cabs are a government franchise, they should not be made to pay a congestion surcharge at all, anymore than you would expect a bus to.

There is another aspect to congestion that is not being discussed. About 20% of all crashes of all types of vehicles in New York City involve TLC licensed vehicles, the vast majority of which are app affiliated vehicles. Indeed, monthly crashes by black cars have increased by 644% since 2014. The most common factor in a crash is driver inattention, which generally is understood to be associated with electronic device use. There is no way that an app driver can function without frequently consulting a phone or a tablet.

As far as app companies self reporting data to the TLC so that the congestion surcharge can be properly assessed – In light of their past performance, wherein they often balked at disclosing required information and such as during the NY Taxi Workers Alliance v Uber lawsuit*, which required Uber to produce pay records, it should be noted that the records they produced in federal court did not match the records produced by the drivers. Obviously, there needs to be a disinterested third party collecting and forwarding all the data to the TLC on a realtime basis. This data is also crucial to a number of measures the TLC is working on such as driver income rules, utilization rates and environmental studies. Anything less will simply not do.

*NY Taxi Workers Alliance v Uber, 16-04098, Document 31-1

Paragraph 7 "As noted in their affidavits, plaintiffs (Uber drivers) noticed that documents they had relied on in determining the existence of violations have been altered by defendants (Uber)" Parenthesis added.

Paragraph 12 "It is clear that there is some alteration of pay record documents going on which would cast a pall over the integrity of the judicial process."

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Member of the NYC Taxi Medallion
Owner Driver Association

Alpha Strategic Planning Corp.
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Testimony before the NYC Council FHV Committee

TLC Rules for Monitoring and Collection of

NYS Congestion Surcharge

November, 19, 2019

Dr. Richard Lipsky

As we are by now all aware, the NYC subway system is in a state of chronic disrepair, and this collapse of efficient service has severe repercussions on the ability of New Yorkers to travel for both work and pleasure. Many traffic experts point to this deteriorating service as one of the major causes of worsening street congestion, since many dissatisfied commuters abandon the subway and opt instead for for-hire vehicles as a more accommodating alternative. (https://www.businessinsider.com/uber-lyft-creating-traffic-cities-bruce-schaller-2018-7)

In response to this transportation crisis, Governor Cuomo and the legislature passed a surcharge on all taxis and for-hire vehicles entering or otherwise using the designated taxi zone south of 96th Street in Manhattan. Some of us took issue with treating both taxis and for-hire vehicles comparably, since the heightened congestion experienced over the past four years has been widely attributed to the entry of Uber and its imitators into the current NYC market. Even so, regardless of the fairness of the current surcharge, I consider it essential that, at the very least, the monitoring and collection of the imposed fee proceed in the fairest and **most efficient method** possible.

The surcharges were enacted to provide badly needed funds for NYC Transit to rehabilitate the deteriorating infrastructure of the city's subway system. It follows that the collection must be monitored, and the funds collected, in the most accurate and timely manner possible. Efficiency and fairness are both critical.

Unfortunately, the proposed rule-making actions of the Taxi and Limousine Commission (TLC) falls short of this standard by failing to require a uniform and comprehensive "technology system" for monitoring surcharges and collecting fees on all for-hire vehicles — taxis and vehicles operated for app-based "Transportation Network Companies" (TNC's) such as Ubers:

I refer you to the TLC's proposed rulemaking for street-hail vehicles at §58-26 and§82-26:

"The Technology System must automatically add the $2.50 Congestion Surcharge to the taximeter in a Taxicab or the $2.75 Congestion Surcharge to the taximeter in a Street Hail Livery when a trip begins in or enters the Congestion Surcharge Zone as described in §58-26 and§82-26 respectively."

As the rules go on to mandate:

"Section 24. Paragraph (3) of subdivision (f) of section 66-24 of Title 35 of the Rules of the City of New York is amended by adding new subparagraphs (xv) and (xvi), to read as follows: (xv) date, time, and location (latitude, longitude, and human-readable street address) of the point at which the vehicle entered the Congestion Zone, if the pick-up was not in the Congestion Zone, based on the reading from the Technology System..."

This language is intended to allow the TLC to know in real time the location of every one of its 13,587 licensed medallion taxis. It also ensures that the taxi meters will be adjusted to accurately account for Zone pickups, and also that the mandated surcharges can be collected in a timely fashion.

This language is intended to allow the TLC to know in real time the location of every one of its 13,587 licensed medallion taxis. It also ensures that the taxi meters will be adjusted to rigorously account for trips made in the congestion zone in order that the mandated surcharges can be collected in a timely fashion.

Alas, there is no comparable requirement for TNC's in the TLC's proposed rules. The TLC's proposed rules have no requirement whatsoever for that the tens of thousands of TNC's be equipped with a "technology system" designed to the same specifications as required for the medallion taxis. Rather, the proposed rules permit vehicles operating under the umbrellas of Uber and Lyft et al. to employ a self-reporting methodology that has all the rigor of a take-home test.

Clearly, this provision of — or, rather, its absence from — the TLC rule-making threatens to undermine the revenue goals of the surcharges enacted by NY State. It also threatens the financial viability of both yellow and green taxis in two ways: one, by opening a loophole that could enable the TNC's to undercut yellow taxi rates by skipping or otherwise evading the new surcharges; two, by allowing vehicles operated as Ubers and Lyfts to avoid the expense of the technology systems that every yellow cab operator and owner will be required to absorb. (https://nypost.com/2018/10/25/uber-and-lyft-will-be-trusted-to-self-report-regarding-surcharges/)

The remedy is clear and simple. Indeed, it is already stated in the TLC's proposed rules to establish a new license class for High-Volume For-Hire Services. In these proposed rules (§59D-14), the commission proposes to order that:

"A High-Volume For-Hire Service must collect and transmit to the Commission, ***in a format, layout, procedure, and frequency prescribed by the Commission*** *the following records:*

(1) **With respect to all trips the High-Volume For-Hire Service dispatches through a Base:**

(i) The date, the time, and the location of the Passenger pickup and drop-off

(ii) The Driver's TLC Driver License number

(iii) The dispatched Vehicle's License number

(iv) The TLC License number of the For-Hire Base that dispatched the Vehicle

(v) The TLC License number of the For-Hire Base affiliated to the dispatched Vehicle

(vi) The total number of passengers picked up and dropped off

(vii) The total trip mileage

(viii) The date and time the Passenger requested the trip

(ix) The itemized fare for the trip including the amount of the fare, any toll, surcharge, commission rate, other deduction and any gratuity and a breakdown of the amount such passenger paid for the trip

(x) The payment the Driver received for the trip or the Driver's hourly paid rate

(xi) If the trip enters the Congestion Zone but the pick-up did not occur in the Congestion Zone, the date, time, and location (latitude, longitude, and human-readable street address) of the point at which the vehicle entered the Congestion Zone, and

(xii) An indicator as to whether the trip was administered as part of the MTA's Access-A-Ride program.

<u>What the TLC needs to do</u>

For the above rules (i) through (xii) to put TNC's on the same footing as taxis, the TLC must also mandate that the TNC's employ the same "technology system" that it requires for all green and yellow taxis — which the commission can do under by adhering to the language in its preamble to Rules (i) through (xii), requiring that for-hire vehicle services submit their data ***"in a format, layout, procedure, and frequency prescribed by the Commission..."***

In order to ensure fairness and equity, the TLC needs to mandate for the FHVs the same "technology system" that is requires for all green and yellow taxis. This would eliminate self-serving self-reporting of companies with records of false submissions to both municipal agencies as well as to courts. At the same time, it would provide the State and the City with real time comparable data that can be used to properly monitor traffic and collect the proper fees from those companies most implicated in the current congestion crisis.

The disrepair in NYC subways, and the dire need for funds, makes it imperative that the TLC ensure that the $60 billion corporate giant pay its proper share for remedying a transit system that it has done so much to undermine. As traffic guru Bruce Schaller found, Uber's success is taking folks from the mass transit system:

"About 60% of ride-hail company users "in large, dense cities would have taken public transportation, walked, biked or not made the trip" if those services had not been available, writes transportation consultant Bruce Schaller in "The New Automobility: Lyft, Uber and the Future of American Cities." The other 40% of users would have taken their own car or a taxi.

As a result of rides replacing mass-transit trips, services such as UberX and Lyft put 2.8 new vehicle-miles on the road for each mile of personal driving they take away. It amounts to a 180% increase in driving on city streets, Schaller concludes.
(https://www.crainsnewyork.com/article/20180725/TRANSPORTATION/180729944/ride-sharing-causes-far-more-city-traffic-than-it-prevents-report)

At the same time, a comparable technology system for FHVs would also enable the TLC to properly implement the FHV licensing law that City Council passed and the Mayor signed last August. In order to assay metrics like, "need for service," congestion," driver income," "environmental impact," and the like, the agency is badly in need of the same kind of independent monitor it has prescribed for taxis.

The main thrust of that local law was to give the TLC comprehensive oversight over the FHV sector so that it can determine optimal service levels and hopefully prevent even more tragedies that were evince this year in the spate of driver and medallion owner suicides. Therefore, in order to properly regulate the laws of the city, and at the same time efficiently and fairly monitor onerous FHV and taxi surcharges, the TLC must require through regulations that all FHVs be independently be monitored by the agency charged with this crucial oversight responsibility.

The State has given the TLC a crucial role in monitoring and collecting congestion surcharges. The City Council and the Mayor have given the TLC a similar regulatory role in order to address the previously unchecked proliferation of FHVS like Uber and Lyft into the city's transportation system. In my view, the agency has is a clear way forward and I urge the City Council and the Mayor to demand that the agency move quickly in this necessary direction.

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Peter M. Mazer
General Counsel

TESTIMONY OF PETER M. MAZER

General Counsel

METROPOLITAN TAXICAB BOARD OF TRADE

City Council For-Hire Vehicle Committee

November 19, 2018

T2018-3260. TLC's Implementation of the Congestion Pricing Surcharge

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Good morning, Chairman Diaz and members of the Committee. My name is Peter Mazer, and I am General Counsel to the Metropolitan Taxicab Board of Trade. We represent the owners and operators of more than 5,000 licensed medallion taxicabs, and also operate a full service drivers' center providing completely free legal, training and other services for the thousands of drivers who drive our members' taxicabs.

On January 1, 2019, the taxicab and street hail livery (SHL) industries will face one of the most significant challenges to confront these battered industries, when a devastating surcharge on rides below 96th Street is imposed, purportedly to deal with congestion, but in reality, to simply subsidize the MTA on the backs of our passengers. Each taxicab ride passing in the zone will go up by $2.50 (on top of the 50 cent MTA surcharge already collected); each SHL ride will go up by $2.75. It will cost nearly $6.00 just to get into one of these vehicles. Only time will tell how seriously ridership and drivers' incomes will be eroded by this new surcharge. But one thing is certain: the TLC, the City, and the MTA will know exactly how much to collect from taxicab and SHL owners because these vehicles are equipped with technology systems (TPEP/LPEP) that will automatically add this surcharge to covered trips. And on February 20, 2019, owners will remit their first payments, for all trips occurring in the month of January, or face significant penalties.

The remainder of the livery industry will also face a $2.75 surcharge for some of their rides, but there will be two significant differences. First, since there is no meter or technology system in their vehicles to monitor rides or fares, these industries will be able to self-report the number of trips and remit to the State an amount that each base determines is appropriate. The TLC recognizes this, since the rules governing the for-hire and black car industries were simply amended to add one sentence directing base owners to bill and collect ***(but not remit)*** the surcharge "as applicable" to the MTA. And the TLC did not even set a penalty for violating this section. So unlike taxicabs and SHL's, where every trip is fully documented using technology outside the control of the owner, in the black car and livery industries, the base owners will decide how many trips are subject to the surcharge and how much they want to pay. And to take it one step further, on November 26th, the TLC will hold a public hearing regarding proposed rules governing high volume for-hire services, but it did not include in these rules a requirement that these bases collect or remit the MTA tax.

The second major difference is that liveries and black cars can essentially declare virtually any trip a group ride trip and pay a surcharge of only seventy five cents per passenger, even if there is only one passenger in the vehicle. The passenger need only declare that he or she is willing to share a ride, even if no ridesharing actually occurs. State law is ambiguous on this point and we await clarification from the Department of Taxation and Finance defining "group rides". But the TLC rule is crystal clear. As long as a passenger has the "understanding' that a ride ***might*** be shared, it is a shared ride subject to the potentially lower surcharge. And there is no mechanism in place, other than the good will of various base owners, to determine how many passengers are actually in a vehicle at any given time.

Ultimately, the congestion surcharge is a state tax, with all of the revenue going to the state, and the state should bear the responsibility for administering and collecting the tax. But in reality, there is a proven mechanism in place to track and collect the tax in the taxicab and SHL industries, and a porous mechanism, at best, to collect it from the remainder of the industry. This inequality has the potential result of allowing segments of the for-hire industry that are moving more than a half million people every day to evade all or part of the tax, while other licensees will be assessed every penny. The solution is simple. Technology exists, which could be mandated in liveries, black cars, and high volume for-hire vehicles, to ensure that this tax is properly assessed, pass onto customers and not drivers, and remitted to the State. It exists in cabs and SHL's, why not in the rest of the industry?

Thank you for the opportunity to speak today. I will be happy to answer any questions you may have.

Spyros Messados Athena Technology City Council
718-683-8495 Committee on For-Hire Vehicles
Spyros@meter.taxi

Concerning TLC Implementation of Congestion Surcharge
November 19, 2018

My name is Spyros Messados. I am a licensed TLC Driver and a Founder of Athena Technology. I was raised in this industry, mentored by drivers and operators, and in recent years, have built a TLC-approved, software-based technology system to better serve New York City taxicabs. Our systems are currently installed in roughly 200 cars and we are contracted to install in 2,500 more, securing about 20% of your yellow taxi market. Our technology is a direct response to the slow pace of innovation in highly regulated transportation sectors: one of the very reasons it has taken nearly half a decade for taxis and traditional FHVs to respond to companies like Uber and Lyft.

A clear benefit the City can derive from our technology is an accurate monitoring of all FHV trips that penetrate the Taxi Zone. We do this today for the taxi industry, which provides the TLC with independent, objective data with which to enforce rules. Through our software, we can accurately monitor all FHV trip origins, destinations and routes. This data would be continuously reported to the TLC in real-time for the purposes of monitoring and collecting the surcharge. This is absolutely essential, given the financial incentive for high volume FHV services like Uber and Lyft to inaccurately or falsely provide records. Today, these companies self-report, leaving the data open to manipulation. With a history of working grey areas between policy, you can ensure that these providers will take advantage of loopholes provided in the law, such as the ability of “pooled” rides (even those with one passenger) to be charged $0.75 instead of the full $2.75 per trip.

The benefits an objective party can bring to City governance are significant but require action by the TLC or the City Council. By formulating an RFP for an independent digital monitor of all FHVs these strides can prove fruitful for City government, regulatory agencies, and all stakeholders of our transit system. I am here today to outline these benefits, and what they could mean for our city. First, I will discuss our technological capabilities in providing a monitoring product. I will then provide some background on our team’s ability to execute and continually improve upon such a product.

Our Technology

Our technology system improves upon dated, analog technology systems in three critical ways. First the core of our product is entirely cloud-based, allowing it to scale to any smart device in a matter of minutes. Second our technology requires little-to-no interference with a vehicle’s mechanical or electrical infrastructure, allowing it to be implemented and scaled on an expedited timeline. Finally, our product can be improved and changed at a rapid pace, to keep up with the ever-changing needs of an urban transportation system.

(1) Cloud—Based Software Suite

Our transportation products are entirely cloud-based and able to be deployed onto any smart device through simple, straightforward development practices. Further, they are compartmentalized, allowing individual “modules” to operate both independently and together. For example, for taxi, we package a digital taximeter with tools for licensing validation, data reporting, driver communication, and in-vehicle payments. These modules can be packaged in a way that allows for streamlined collection of both data and funds for the congestion surcharge. Many of our modules are already conducting the functions needed for the City and State to do exactly this.

Beyond that, we have developed tools for reporting and analytics that allow transportation stakeholders to quickly identify and analyze patterns in transportation. These tools leverage our product's machine learning capabilities to provide easily digestible findings and data visibility. This solves a critical problem facing legislators and regulators today: a lack of transparency and analysis of trip data in the for-hire vehicle segment.

(2) Minimal to Zero Hardware Interference

Our technology can be deployed with minimal interference or deployment of hardware. This is due to the product's actual operating elements being software-based, with smart devices like tablets or phones as simple conduits for them.

For example, despite heavy requirements surrounding installation of a technology system in taxicabs, our current systems can be installed in a minimally invasive way in under 30 minutes. This is due to the simplicity of install, as our system requires no mechanical components to operate. Furthermore, depending on the requirements determined by regulators, this process can be further streamlined to remove the necessity of **any** hardware in implementation of this technology as it relates to the congestion surcharge.

Given the nature of our product, we can meet all the needs of City and State regulators by packaging a product entirely comprised of scalable software, eliminating the need for any kind of physical installation. This is not only much preferable but is one of the only ways that such a system can be implemented on the short timeline we face today. Through many levels of regulatory testing and approvals our team has proven that we can complete projects that have taken traditional providers months or years in a matter of days or weeks.

(3) Rapid Development & Improvement

The architecture of our product allows for rapid improvement and deployment of updates. Every component we build can be updated remotely and without interference to existing systems. This enables our regulatory agencies to succeed in an increasingly difficult job: monitoring a for-hire industry that has become near impossible to manage in both size and segmentation. Our regulators need to be empowered by tools that help them enforce their own policies, or this will only be the beginning of our inability to catch-up to the speed of innovation.

With an independent, digital monitor in place, our ability to govern can finally match the speed at which private enterprises can innovate and change the way our transportation infrastructure functions. In fact, these changes would be far easier to implement than the cumbersome process we are going through now. Once a digital monitor is in place, the TLC can issue directives to change and adapt the product to suit their needs. It is an evolution of enforcement, for the modern age.

Benefits of Implementation

A digital monitoring system would provide absolute transparency for New York City as it pertains to for-hire transportation. This would, in the near term, allow for the accurate determination and collection of the congestion surcharge. With a slightly longer term view, this would allow New York City to revisit and refine its policies, providing an alternative (and executable) approach to the one-size fits all congestion surcharge. An independent monitor can both inform these policies and implement the necessary changes with ease.

New York City would become a world-leader in digital enforcement and governance. Think of the speed, and innovation associated with Silicon Valley tech firms combined with a deep regulatory understanding of the pressures and challenges facing a highly congested, highly regulated urban transit system. This is very much the cooperative nature in which our team and technology work with regulators and industry stakeholders to improve, while satisfying the concerns of the TLC, New York City and New York State.

Our Team

Behind our technology is a team of passionate, talented individuals pushing it forward. These individuals have highly valuable experience and perspective in creating such technology.

Despite being TLC's newest provider for technology systems, our team has deep expertise across transportation sectors and in various technological fields. This has allowed us to break into a market previously controlled by only two providers and secure some of New York City's largest and most prominent taxi fleets. These individuals all have a passion for improving transportation efficiency, urban mobility, and quality of life for drivers and passengers alike.

Transportation Expertise

Athena's management, staff, and advisory board are comprised of transportation professionals and industry operators from all segments. These individuals range from veterans with decades of experience to talented young professionals, from gig-economy drivers to ivy league-educated analysts. This brings not only expertise in for-hire transit, but fresh perspectives that challenge a traditional way of thinking. Together, these varied backgrounds come together to formulate our wholesome approach to transportation technology.

Technology Expertise

Our engineering team brings this same range of expertise and understanding to projects such as a digital monitoring technology. Our technical teams boast a rich history in computer engineering with a particular focus on high-throughput industries like for-hire. This includes engineers who have built and scaled app-based hailing services, dispatching technologies, and data-collection tools. They have successfully built, sold, and lead numerous technology companies. They boast several pHDs, a range of engineering specialties, and a passion for improvement through technological means. Together with our transportation leaders, these teams cohesively evaluate the needs for New York City when it comes to mobility and movement.

It is our sincere hope that our team and technology are given the opportunity to show the TLC, City, and State just how much this technology can help to tackle the problems they are facing today. We implore the TLC to issue an RFP for the creation of an independent digital monitor for all for-hire transportation in New York City. Through such RFP, our teams would be given the chance to show what is possible with modern technology if deployed in a sustainable, responsible way.

Thank you.

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: MOHAMED TIPU SULTA

Address: ________

I represent: Taxi Worker Alliance

Address: ________

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☐ in favor ☐ in opposition

Date: 11/19/2018

(PLEASE PRINT)

Name: Jose Hernandez

Address: ________

I represent: United Spinal Association

Address: ________

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Date: ________

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Name: Spyros Messados

Address: 4552 Decatur Pl, Islnd Prk NY

I represent: Athena Technology

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

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☐ in favor ☒ in opposition

Date: 11-19-18

(PLEASE PRINT)

Name: MICOKAE HEMT

Address: 60-08 79 HUSP

I represent: Queens N.Y. XII

Address:

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Must be out by 12:00 PM

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Date: 11/19/2018

(PLEASE PRINT)

Name: Aleksey Medvedovskiy

Address: 876 McDonald Ave, Brooklyn, NY 11218

I represent: LAcus Technologies LLC

Address: 876 McDonald Ave, Brooklyn, NY 11218

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I intend to appear and speak on Int. No. ________ Res. No. ________
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Date:

(PLEASE PRINT)

Name: Solomon Meuschatz

Address:

I represent: Yellow Taxi Industry

Address:

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

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☐ in favor ☐ in opposition

Date: 11-19-18

(PLEASE PRINT)

Name: LAL SINGH

Address: 46 VINCENT RD HICKSVILLE

I represent: NY TWA

Address:

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☐ in favor ☒ in opposition

Date: 11/19/18

(PLEASE PRINT)

Name: Augustine Tang

Address: 53 Boerum Place Apt. 2K BK, NY 11201

I represent: TWA

Address:

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☐ in favor ☐ in opposition

Date: 11/19/18

(PLEASE PRINT)

Name: Jacob Policano (on behalf of David Beier)

Address:

I represent: Committee for Taxi Safety

Address:

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☐ in favor ☐ in opposition

Date: 11-19-18

(PLEASE PRINT)

Name: Mario Peña

Address: 1286 Grant Ave. #1 Bronx NY 10456

I represent: FHV

Address:

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Appearance Card

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☐ in favor ☐ in opposition

Date: ______

(PLEASE PRINT)

Name: BRIDGET FELIX

Address:

I represent: FHV DRIVERS

Address:

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☐ in favor ☐ in opposition

Date: ______

(PLEASE PRINT)

Name: Basilio Beltre

Address: FHV

I represent:

Address:

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THE CITY OF NEW YORK

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☐ in favor ☐ in opposition

Date: 11/19/2018

(PLEASE PRINT)

Name: PETER M MAZER

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

I represent: METROPOLITAN TAXICAB BOARD OF TRADE

Address: SAME 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: Richard Lipsky

Address: ______

I represent: Allpha Strategic Planny

Address: ______

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Appearance Card

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

☐ in favor ☐ in opposition

Date: November 19, 2018

(PLEASE PRINT)

Name: MeerA Joshi, TLC COMMISSIONER

Address: 33 Beaver St., NYC

I represent: TLC

Address: ______

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

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☐ in favor ☐ in opposition

Date: ________

(PLEASE PRINT)

Name: CHARLES KOMANOFF

Address: 11 HANOVER SQUARE

I represent: taxi medallion owners

Address:

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THE CITY OF NEW YORK

Appearance Card

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

☐ in favor ☐ in opposition

Date: 11/19/18

(PLEASE PRINT)

Name: TANVIR ahmed

Address:

I represent: Taxi Medallion owner

Address:

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THE CITY OF NEW YORK

Appearance Card

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

☐ in favor ☐ in opposition

Date: 11/19/18

(PLEASE PRINT)

Name: Raul Rivera

Address: 1831 pilgrim Ave Bx ny

I represent: myself TLC Driver.

Address:

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11/19/

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☐ in favor ☐ in opposition

Date: ________

(PLEASE PRINT)

Name: Bernardo Celerino

Address: ________

I represent: Medallion Owner

Address: ________

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

☐ in favor ☐ in opposition

Date: 11/19/18

(PLEASE PRINT)

Name: CAROLYN PROTZ

Address: ________

I represent: MEDALLION OWNER

Address: ________

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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 A. RODRIGUEZ

Address: 208 W 149 ST APT 1L

I represent: TAXI DRIVER DEFENSE GROUP

Address: ________

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