

EXHIBIT 1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
In the Matter of :

**NEW YORK TAXI WORKERS ALLIANCE; AMARA
SANOGO; RICHARD CHOW** :

Petitioners, :

For a Judgment Pursuant to Article 78
of the Civil Practice Law and Rules :

-against- :

**DAVID DO, AS COMMISSIONER AND CHAIR OF
THE NEW YORK CITY TAXI & LIMOUSINE
COMMISSION; THE NEW YORK CITY TAXI &
LIMOUSINE COMMISSION; THE CITY OF NEW
YORK,** :

Respondents. :

-----X

Index No. 160795/2023

Hon. Machelle Sweeting, J.S.C.

Motion Seq. No. 001

**MEMORANDUM OF LAW OF AMICUS CURIAE INDEPENDENT DRIVER'S GUILD
IN OPPOSITION TO PETITIONERS' ORDER TO SHOW CAUSE SEEKING, *INTER
ALIA*, A PRELIMINARY INJUNCTION AND A TEMPORARY RESTRAINING ORDER**

TABLE OF CONTENTS

	Page(s)
TABLE OF AUTHORITIES	ii
INTEREST OF <i>AMICUS CURIAE</i>	1
BACKGROUND	2
SUMMARY OF THE ARGUMENT	3
I. THE OTSC SHOULD BE DENIED BECAUSE THE TLC’S DECISION TO OPEN EV FHV LICENSES IS NOT ARBITRARY OR CAPRICIOUS	3
CONCLUSION.....	7

TABLE OF AUTHORITIES

	Page(s)
CASES	
<i>Cohen v. State of New York</i> , 2 A.D.3d 522 (2d Dep’t 2003)	5
<i>Heintz v. Brown</i> , 80 N.Y.2d 998 (1992)	4
<i>Pell v. Bd. Educ.</i> , 34 N.Y.2d 222 (1974)	4
<i>Presidents’ Council of Trade Waste Associations, Inc. v. City of New York</i> , 159 A.D.2d 428 (1st Dep’t 1990)	5
<i>Purdy v. Kreisberg</i> , 47 N.Y.2d 354 (1979)	4
<i>Sullivan County Harness Racing Ass’n v. Glasser</i> , 30 N.Y.2d 269 (1972)	5
STATUTES	
35 RCNY § 59A-06(a)(1)	2
Administrative Code § 19-502	2
Administrative Code § 19-550	2, 3
CPLR § 7803	4
LL 147	<i>passim</i>
OTHER AUTHORITIES	
NYS Energy Research and Development Authority, <u>How New York is Preparing for an EV Future</u> (Feb. 12, 2024)	6

INTEREST OF AMICUS CURIAE

Amicus, Independent Driver’s Guild (“IDG”), a driver-led and driver-powered advocacy group, *pro se*, respectfully submits this memorandum and accompanying materials as proposed *amicus curiae* in opposition to Petitioners’ motion, by Order to Show Cause, for a temporary restraining order and an injunction enjoining TLC’s October 18, 2023, Decision (the “Decision”) to open applications for Electric Vehicle (“EV”) For-Hire Vehicle (“FHV”) licenses (the “OTSC”) (Motion Sequence No. 001).¹

IDG has a substantial interest in the outcome of the OTSC, which should be denied in its entirety. IDG has a substantial presence in the for-hire transportation industry as it represents approximately 80,000 FHV drivers in New York City and advocates to improve working conditions for over approximately 250,000 for-hire drivers across New York, New Jersey, Connecticut, Massachusetts, Illinois, and Florida. IDG has thousands of members to whom it supplies a wide array of benefits, including financial coaching and legal assistance. Additionally, as detailed below, many of IDG’s New York City members are career drivers who are trapped renting FHVs because of the licensing “pause” and who have indicated to IDG their interest in obtaining an EV FHV license or that they applied for an EV FHV license.

The TLC’s Decision is appropriate, and placing a limit on the number of EV FHV licenses that TLC may issue, as Petitioners seek to do, would undoubtedly negatively impact the interests of IDG and its New York City member driver base by, among other things, causing its driver members to either pay high costs to rent FHVs in lieu of owning or leave the profession altogether. In light of the foregoing, IDG has a vital interest in opposing the OTSC.

¹ All capitalized terms herein have the same definition and meaning as ascribed in the accompanying Affirmation of Scott Cantone, dated February 13, 2024 (the “Cantone Aff.”) unless otherwise defined herein.

BACKGROUND

The TLC's Decision to issue EV FHV licenses is wholly appropriate and relates to Section 59A-06(a)(1) of title 35 of the Rules of the City of New York ("RCNY") (the "Rule"), which, in pertinent part, provides "[b]eginning February 2023, the Commission will review the number of For-Hire Vehicle Licenses, pursuant to section 19-550(b)(2) of the Administrative Code of the City of New York and determine the number of For-Hire Vehicle Licenses, if any, to issue in the twelve months following such review and the types of vehicles to which the Commission will issue such new Licenses." 35 RCNY § 59A-06(a)(1). Regarding FHVs, the New York City Administrative Code (the "Administrative Code") § 19-502(g) defines "for-hire vehicles" to mean "a motor vehicle carrying passengers for hire in the city, with a seating capacity of twenty passengers or less, not including the driver, other than a taxicab, coach, wheelchair accessible van, commuter van or an authorized bus operating pursuant to applicable provisions of law." Administrative Code § 19-502(g).

On August 14, 2018, the City of New York enacted New York City Local Law ("Local Law") No. 147 of 2018, implementing an FHV licensing pause by directing that the TLC "shall not issue new for-hire vehicle licenses for 12 months after the effective date of this local law ..." subject to certain exceptions ("LL 147"). LL 147 at Section 1.a. Regarding the aforesaid "pause," Administrative Code § 19-550, sets forth that, following the one-year licensing pause, TLC "shall review the number of for-hire vehicle licenses on a periodic basis, but not less than once annually, and based on such review may regulate the number of for-hire vehicle licenses issued pursuant to section 19-504[.]" Administrative Code § 19-550(b)(2). The statute also sets forth certain criteria for consideration in connection with the TLC's decision to issue licenses after the "pause." *See* Administrative Code § 19-550(c). Administrative Code § 19-550(a) directs the TLC, in conjunction with the NYC Department of Transportation, to conduct a one-

year study of certain factors in connection with the issuance of FHV licenses. *See* Administrative Code § 19-550(a). LL 147 directs the TLC to study the impact of for-hire vehicles on the City of New York. *See* LL 147.

Under the terms of Local Law 147, the TLC’s periodic review and decisions regarding the issuance of new FHV licenses were exempt from the rulemaking requirements of the Citywide Administrative Procedures Act (“CAPA”), N.Y. City Charter § 1041, *et seq.* *See* LL 147 (providing that “[n]otwithstanding subdivision a of this section, the taxi and limousine commission may issue any number of new for-hire vehicle licenses upon a determination by the commission that issuing such number of new for-hire vehicle licenses would increase the availability of for-hire services in different geographic areas of the city where such services are needed, and where such licenses would not substantially contribute to traffic congestion, and the promulgation of rules pursuant to chapter 45 of the New York city charter shall not be required for any action taken by the commission pursuant to this subdivision”)

It is understood that TLC soundly rendered its Decision after engaging in multiple studies and reports culminating in its February 2023 Report, which examined, *inter alia*, congestion levels, driver pay, license attrition rates, outer borough service, availability and demand for battery electric vehicles, and other relevant information. (*See, e.g.*, Cantone Aff., **Ex. B**, February 2023 Report.)

SUMMARY OF THE ARGUMENT

I. THE OTSC SHOULD BE DENIED BECAUSE THE TLC’S DECISION TO OPEN EV FHV LICENSES IS NOT ARBITRARY OR CAPRICIOUS

The Decision by the TLC to issue EV FHV licenses is appropriate and is not arbitrary or capricious because, *inter alia*, limiting EV FHV licenses would effectively cause IDG’s member

drivers to continuing paying high rental costs to rent FHV's in lieu of owning or prevent them from participating in the industry entirely.

When assessing whether an administrative agency's determination is arbitrary, capricious, or an abuse of discretion, "the court's scope of review is limited to an assessment of whether there is a rational basis for the administrative determination without disturbing underlying factual determination." *Heintz v. Brown*, 80 N.Y.2d 998, 1001 (1992) ("Nor was respondents' determination arbitrary, capricious or an abuse of discretion. In this regard, the court's scope of review is limited to an assessment of whether there is a rational basis for the administrative determination without disturbing underlying factual determination."); *see also Pell v. Bd. Educ.*, 34 N.Y.2d 222, 230-31 (1974) ("[t]he courts cannot interfere unless there is no rational basis for the exercise of discretion or the action complained of is 'arbitrary and capricious'") (citing Cohen and Karger, Powers of the New York Court of Appeals, pp. 460-461; 8 Weinstein-Korn-Miller, N.Y. Civ. Prac., par. 7803.04 *et seq.*; 1 N.Y. Jur., Administrative Law, §§ 177, 184; *Matter of Colton v. Berman*, 21 N.Y.2d 322, 329 (1967)). CPLR § 7803 provides, in pertinent part, "whether a determination was made in violation of lawful procedure, was affected by an error of law or was arbitrary and capricious or an abuse of discretion, including abuse of discretion as to the measure or mode of penalty or discipline imposed." CPLR § 7803(3).

Additionally, "[a] reviewing court in passing upon this question of law may not substitute its own judgment of the evidence for that of the administrative agency, but should review the whole record to determine whether there exists a rational basis to support the findings upon which the agency's determination is predicated." *Purdy v. Kreisberg*, 47 N.Y.2d 354, 358 (1979). "[I]f the acts of the administrative agency find support in the record, its determination is

conclusive” *Sullivan County Harness Racing Ass’n v. Glasser*, 30 N.Y.2d 269, 278 (1972); *see Presidents’ Council of Trade Waste Associations, Inc. v. City of New York*, 159 A.D.2d 428, 430 (1st Dep’t 1990); *see also Cohen v. State of New York*, 2 A.D.3d 522, 525 (2d Dep’t 2003). That the Decision was rationally based and was not arbitrary and capricious is demonstrated by, *inter alia*, the TLC’s February 2023 Report and is further demonstrated by IDG’s arguments below which show that limiting EV FHV licenses will result in IDG’s member drivers continuing to incur high rental costs compared to owning a vehicle or prevent them from participating in the industry.

The Decision is not arbitrary and capricious because, *inter alia*, limiting EV FHV licenses would cause IDG’s member drivers to continue paying high rental costs in lieu of licensing their own vehicle or prevent them from participating in the industry. Regarding renters, following the “pause” that was implemented under LL 147, many of IDG’s members have been driven into renting FHVs because they are unable to license their own vehicles due to the TLC’s decision to continue the licensing pause with very limited exceptions. (*See Cantone Aff.*, ¶ 3.) Renting a vehicle to work as an FHV driver costs more than owning a vehicle and obtaining an FHV license. (*Id.*) Indeed, the vast majority of IDG’s member drivers own or lease and have their own FHV license (*approximately 59,200 of its 80,000 driver members*) rather than rent. (*Id.*, ¶ 3.) That is for good reason, as IDG estimates that its members are paying rental costs of approximately \$400–\$750 per week (\$20,800–\$39,000 per year) depending on vehicle type. (*id.*, **Ex. A.**) Drivers who rent pay thousands more annually than those who can license their own vehicles – and they have no vehicle of their own at the end to show for it. The significant cost of renting FHVs demonstrates that having an FHV license is more economical, which is also apparent from the substantial number of owners as compared to renters. These high

rental costs warrant upholding TLC's Decision to issue EV FHV licenses as that would likely lead to more vehicle ownership which would, in turn, benefit IDG's members.

Additionally, limiting EV FHV licenses would prevent IDG's member drivers from participating in the industry as there would undoubtedly be less opportunity to do so. It is understood that the demand for electric vehicles is projected to continue to grow for years to come.² IDG does not expect that issuing EV FHV licenses would result in an influx of new drivers but, rather, expects that a portion of existing FHV drivers who have been relegated to renting FHVs would now obtain an EV and apply for an EV FHV license of their own. Limiting the issuance of EV FHV licenses as Petitioners seek to do would deter many of those existing FHV drives from purchasing an EV or from pursuing an EV FHV license of their own to their financial detriment. Accordingly, limiting EV FHV licenses would negatively impact IDG's member drivers by causing them to continue paying high rental payments or prevent them from participating in the industry entirely to the financial determinant of IDG's member drivers.

Based upon the foregoing, the TLC's Decision is not arbitrary or capricious as limiting EV FHV licenses would negatively affect IDG and its member drivers by causing them to continue to incur high rental costs or prevent them from participating in the industry.

[This space is intentionally left blank.]

²See NYS Energy Research and Development Authority, [How New York is Preparing for an EV Future](https://www.nyserda.ny.gov/Featured-Stories/How-New-York-is-Preparing-for-an-EV-Future), <https://www.nyserda.ny.gov/Featured-Stories/How-New-York-is-Preparing-for-an-EV-Future> (Feb. 12, 2024) ("In New York, registration for new EVs surged by 231% from 2020 to 2022").

CONCLUSION

For the foregoing reasons, this Court should deny Petitioners' OTSC for a temporary restraining order and a preliminary injunction.

Dated: New York, New York
February 13, 2024

INDEPENDENT DRIVERS GUILD

By: /s/Scott Cantone

Scott Cantone
Of Counsel
41-09 36th Street #3
Long Island City, NY 11101
Amicus, Pro Se

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
In the Matter of

**NEW YORK TAXI WORKERS ALLIANCE; AMARA
SANOGO; RICHARD CHOW**

Petitioners,

For a Judgment Pursuant to Article 78
of the Civil Practice Law and Rules

-against-

**DAVID DO, AS COMMISSIONER AND CHAIR OF
THE NEW YORK CITY TAXI & LIMOUSINE
COMMISSION; THE NEW YORK CITY TAXI &
LIMOUSINE COMMISSION; THE CITY OF NEW
YORK,**

Respondents.
-----X

Index No. 160795/2023

Hon. Mabelle Sweeting, J.S.C.

Motion Seq. No. 001

**AFFIRMATION OF SCOTT CANTONE IN SUPPORT OF AMICUS CURIAE
INDEPENDENT DRIVER’S GUILD IN OPPOSITION TO PETITIONERS’
ORDER TO SHOW CAUSE**

Scott Cantone, an attorney duly admitted to practice before the Courts of the State of New York, hereby affirms, under penalty of perjury:

1. I am of counsel of *pro-se* non-party proposed *amicus curiae* Independent Drivers Guild (“IDG”). As such, I am fully familiar with the circumstances stated herein. I respectfully submit this affirmation in support of IDG’s opposition to Petitioners’ motion, by Order to Show Cause, for a temporary restraining order and an injunction enjoining TLC’s October 18, 2023, Decision (the “Decision”) to open applications for Electric Vehicle (“EV”) For-Hire Vehicle

(“FHV”) licenses (the “OTSC”) (Motion Sequence No. 001). The OTSC should be denied for the reasons set forth herein and in the accompanying Memorandum of Law.¹

2. IDG has a substantial interest in the outcome of the OTSC for many reasons. IDG is a FHV driver-led and driver-powered advocacy group with thousands of members in New York City. IDG has a substantial presence in the for-hire transportation industry as it represents approximately 80,000 FHV drivers in New York City and advocates to improve working conditions for over approximately 250,000 for-hire drivers across New York, New Jersey, Connecticut, Massachusetts, Illinois, and Florida. IDG has thousands of members to whom it supplies a wide array of benefits, including financial coaching and legal assistance. Additionally, many of IDG’s New York City members are career drivers who are stuck renting FHVs because of the FHV licensing “pause” that has been in effect since 2018 (*see* Memorandum of Law, p.2), and who have indicated to IDG their interest in obtaining an EV FHV license or that they applied for an EV FHV license. The TLC’s Decision is appropriate and placing a limit on the number of EV FHV licenses that TLC may issue would negatively impact the interests of IDG and its New York City member base by, among other things, causing its driver members to incur high costs to rent FHVs or leave the profession altogether, as is further detailed below.

3. The OTSC should be denied because, *inter alia*, the TLC’s Decision was not arbitrary or capricious as limiting EV FHV licenses would effectively (*i*) cause IDG’s member drivers to continuing paying high rental costs in lieu of owning or (*ii*) push them out of the industry entirely. *First*, limiting EV FHV licenses would cause IDG’s member drivers who rent FHVs to continue to pay high costs to rent an FHV rather than obtaining their own FHV licenses. Following

¹ New York Taxi Workers Alliance (“TWA”), Amara Sanogo (“Sanogo”), and Richard Chow (“Chow”) are collectively referred to herein as “Petitioners”) and respondents David Do, as Commissioner and Chair of the New York City Taxi & Limousine Commission (“Do”), the New York City Taxi & Limousine Commission (“TLC”), and the City of New York (“NYC”) are collectively referred to herein as “Respondents”.

the “pause” that was implemented under LL 147, many of IDG’s member drivers have been forced into renting or leasing EV FHV’s which is generally more expensive than owning a vehicle. Most of IDG’s driver members license their own vehicles rather than rent FHV’s. Indeed, IDG estimates that approximately (1) 16,000 are renting, (2) 8,800 are leasing, and (3) and 59,200 own. Those figures demonstrate that the vast majority of IDG’s members prefer to own rather than lease or rent FHV’s. IDG also estimates that its member drivers who rent FHV’s generally pay rental costs ranging from \$400–\$750 per week (\$20,800–\$39,000 per year) depending on vehicle type, which is evidenced by screen prints from americanlease.com, tlcrentalmarketplace.com, towertlcredentials.com, and freindlytlc.com (collectively, the “Articles”) annexed hereto as **Exhibit A**.

4. *Second*, limiting EV FHV licenses would prevent IDG’s members from participating in the industry as there would undoubtedly be less opportunity to do so. IDG does not expect that issuing EV FHV licenses would result in an influx of new drivers but, rather, expects that a small portion of existing FHV drivers who rent would now purchase an EV and apply for an EV FHV license of their own. The considerable cost of renting weighs in favor of owning, which is also apparent from the substantial number of owners as compared to renters. Based upon the foregoing, the TLC’s Decision is not arbitrary or capricious as limiting EV FHV licenses would negatively affect IDG and its member drivers by causing them to continue to either incur high rental costs, which cuts into their total earnings, or prevent them from participating in the industry.

5. Annexed hereto as **Exhibit B** is a true and correct copy of the TLC’s License Review Report issued on October 18, 2023 (the “February 2023 Report”).

6. Accordingly, the OTSC should be denied in its entirety.

Dated: February 13, 2024
New York, New York



SCOTT CANTONE

EXHIBIT A

- [Call Us -](#)
- nyctlrentalsllc@gmail.com

[LOGIN](#) | [REGISTER](#)

 DRIVER APPLICATION

- [Home](#)
- [About Us](#)
- [Resources](#)
 - [TLC tickets and violations](#)
 - [TLC Insurance Brokers](#)
 - [TLC body shop](#)
 - [TLC School](#)
 - [TLC Car Rental Brooklyn](#)
- [Contact Us](#)

Post Ads



• **TLC READY CARS AVAILABLE**
 ALL MAKES
 AND MODELS
FIND THE CAR YOUR LOOKING FOR!
[Contact Now](#)



#1 insurance brokerage
PEARLAND
BROKERAGE
(718) 421-6677
[Contact Now](#)



For rates & Availability

Find From NYC TLC

Vehicle Type
 ▼

Search
 ▼

Your Budget (start from?)

Body Style
 ▼

Fuel
 ▼

Browse

Featured Ads

[View all](#)

[UBER and LYFT TLC Cars Available NOW - \\$375 \(791 McDonald Ave\)](#)

[UBER and LYFT TLC Cars Available NOW - \\$375 \(791 McDonald Ave\)](#)

: \$375.00 - Sedan


[TLC CAR FOR RENT 2018](#)

[TLC CAR FOR RENT 2018](#)

Rent: \$425.00 - Hybrid

[2017 / 2018 Toyota Camry Uber Rental](#)

[2017 / 2018 Toyota Camry Uber Rental](#)

: \$425.00 - Sedan


TLC Rental for Toyota Rav4 2018 - \$450

: \$450.00 - SUV

Our New Adds

Latest Trending Ads



TLC PLATE FOR RENT!!

Ad Type: rent brooklyn, new york - Sedan Price: \$150.00

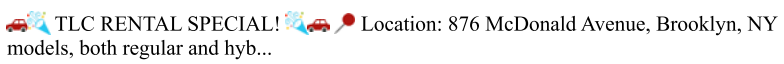
TLC PLATE FOR RENT!! Required: TLC +1 DMV +3 Call or text 347-939-5440 / 917-979-6699...

[Contact Now](#)



TLC RENTAL CARS! 929-271-7711

Ad Type: rent , - Hybrid Price: \$450.00

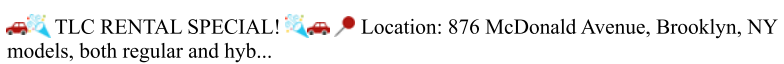
 We have a wide range of reliable Camrys available, from 2015 to 2022 models, both regular and hyb...

[Contact Now](#)



TLC RENTAL CARS! 929-271-7711

Ad Type: rent , - Hybrid Price: \$450.00

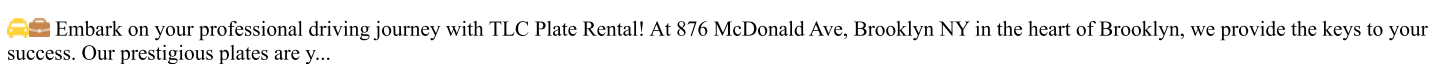
 We have a wide range of reliable Camrys available, from 2015 to 2022 models, both regular and hyb...

[Contact Now](#)



TLC RENTAL PLATES! 929-271-7711

Ad Type: rent , - Other Price: \$150.00

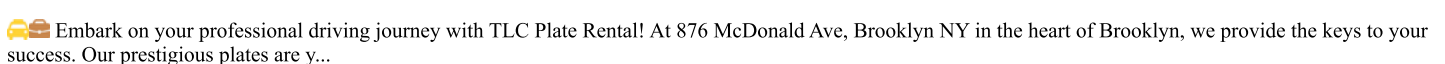


[Contact Now](#)



TLC PLATES FOR RENT 929-271-7711

Ad Type: , - Price: \$150.00



[Contact Now](#)



TLC RENTAL CARS and PLATES! 929-271-7711

Ad Type: rent , - Other Price: \$150.00

...

[Contact Now](#)



TLC RENTAL CARS! 929-271-7711

Ad Type: rent , - Hybrid Price: \$400.00

TLC RENTAL SPECIAL! 🚗📍 Location: 876 McDonald Avenue, Brooklyn, NY 🚗 We have a wide range of reliable Camrys available, from 2015 to 2022 models, both regular and hyb...

[Contact Now](#)

[TLC RENTAL CARS! 929-271-7711](#)

[TLC RENTAL CARS! 929-271-7711](#)

Ad Type: rent , - Hybrid Price: \$400.00

TLC RENTAL SPECIAL! 🚗📍 Location: 876 McDonald Avenue, Brooklyn, NY 🚗 We have a wide range of reliable Camrys available, from 2015 to 2022 models, both regular and hyb...

[Contact Now](#)

[TLC CAR RENTAL](#)

[TLC CAR RENTAL](#)

Ad Type: rent , - Hybrid Price: \$450.00

TLC RENTAL SPECIAL! 🚗📍 Location: 876 McDonald Avenue, Brooklyn, NY 🚗 We have a wide range of reliable Camrys available, from 2015 to 2022 models, both regular and ...

[Contact Now](#)

[TLC RENTAL CARS! 929-271-7711](#)

[TLC RENTAL CARS! 929-271-7711](#)

Ad Type: rent , - Hybrid Price: \$400.00

TLC RENTAL SPECIAL! 🚗📍 Location: 876 McDonald Avenue, Brooklyn, NY 🚗 We have a wide range of reliable Camrys available, from 2015 to 2022 models, both regular and hyb...

[Contact Now](#)

[TOYOTA CAMRY HYBRID VEHICLES AVAILABLE FOR RENT](#)

[TOYOTA CAMRY HYBRID VEHICLES AVAILABLE FOR RENT](#)

Ad Type: rent , - Hybrid Price: \$425.00

(917) 435-5926...

[Contact Now](#)

[TLC CAR for rent UberX](#)

[TLC CAR for rent UberX](#)

Ad Type: rent , - Price: \$475.00

TLC CAR FOR RENT 2020 CHEVY EQUINOX (UBERX) \$475 WEEKLY. ONE WEEK DEPOSIT+1ST WEEK PAYMENT TO START. PRICE MIGHT CHANGE DUE TO LICENSE EFFECTING THE INSURANCE PREMIUM. CALL OR TEXT TO TAYLAN 516 300 3...

[Contact Now](#)

[TOYOTA COROLLA CROSS FOR RENT \(917\) 435-5926](#)

[TOYOTA COROLLA CROSS FOR RENT \(917\) 435-5926](#)

Ad Type: rent , - Other Price: \$600.00

10 HOURS AGO We have a wide selection of vehicles from 2015-2020 Toyota Camry Hybrids To 2019-2024 Toyota Rav 4 XLE'S For Rent!One rent One deposit. Located in Bayside Queens....

[Contact Now](#)

[TOYOTA COROLLA CROSS FOR RENT](#)

[TOYOTA COROLLA CROSS FOR RENT](#)

Ad Type: rent , - Other Price: \$600.00

We have a wide selection of vehicles from 2015-2020 Toyota Camry Hybrids To 2019-2024 Toyota Rav 4 XLE'S For Rent!One rent One deposit. Located in Bayside Queens New York, 11360. Call me at (91...

[Contact Now](#)

[TLC CAR Rental - \\$350\(LONG ISLAND CITY\)](#)

TLC CAR Rental - \$350(LONG ISLAND CITY)

Ad Type : rent brooklyn, new york - Sedan Price : \$425.00

Price is Right! Super Value!! TLC Cars for Sale Ready for Rental or Lease to Own. Offices and 3 Garages in LIC, Bronx and Manhattan Conveniently Open 24/7- Ready to go when YOU ARE! Rental...

[Contact Now](#)

Displaying 1 - 15 of 1429

Pages : 1 [2](#) [3](#) [4](#) [5](#) [6](#) [7](#) [8](#) [9](#) [10](#) > >> |

BMW OF WEST SPRINGFIELD

List / Find / Sell

TLC Car Rentals

... [read more](#)

Useful link

- [TLC tickets and violations](#)
- [TLC Insurance Brokers](#)
- [TLC body shop](#)
- [TLC School](#)
- [Uber Car Rental NYC](#)
- [TLC Car Rental Brooklyn](#)
- [Home](#)
- [About Us](#)
- [Resources](#)
- [Contact Us](#)
- [Terms & Conditions](#)
- [Privacy Policy](#)

More link

- [Login](#)
- [Register](#)
- [Post Ads](#)
- [My Control Panel](#)

Hot contact

- nyctlrentalsllc@gmail.com
-
-

Subscribe

Subscribe to our Newsletters
Your email

Copyright © 2024 NYC TLC RENTALS

Follow Us:

Our website uses cookies and thereby collects information about your visit to improve our website (by analyzing), to show you relevant content and advertisements. Please see our cookies page for further details or agree by clicking the 'Accept' button.

Accept all cookies



Plate for rent or sale

\$150.00 /week



📍 Long Island City

YELLOW TAXIS AVAILABLE FOR LOW WEEKLY RATES

\$750.00 /week



📍 Queens

NOW!! READY TO DRIVE TLC CARS

\$400.00 /week



📍 Staten Island

uber way for rent toyota sienna

\$420.00 /week



📍 Long Island City

2020 TLC WAY TOYOTA SIENNA 2020, XL

\$545.00 /week



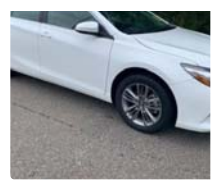
📍 Queens

Yellow Taxis available for lease

\$800.00 /week



Our website uses cookies and thereby collects information about your visit to improve our website (by analyzing), to show you relevant content and advertisements. Please see our cookies page for further details or agree by clicking the 'Accept' button.



TLC CAR FOR RENT

\$400.00 / week



📍 Long Island City

TLC PLATE 139\$ WEEK 848-288-2188

\$130.00 / week




📍 Long Island City

TLC PLATE 139\$ WEEK 848-288-2188

\$130.00 / week






📍 Manhattan

TOYOTA CAMRY AWD XLE 2020 (FULL INSURANCE INC.)

\$450.00 / week





📍 Long Island City

TLC WAY TOYOTA SIENNA 2020, XLE

\$545.00 / week



CALL NOW : 718-433-2323 GET PAID EVERY DAY! INSTANT PAY FOR ALL DRIVERS!

[Apply Now](#)



[Body Shop](#)

[English](#)

[HOME](#)

[RENTAL](#)

[LEASE TO OWN](#)

RENTAL

Sedan, XL and WAV



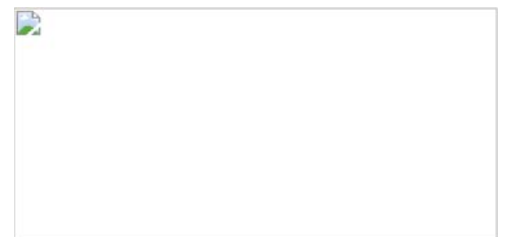
TOYOTA CAMRY
AS LOW AS \$475
[Apply Now](#)



NISSAN SENTRA
AS LOW AS \$425
[Apply Now](#)



HYUNDAI ELANTRA
AS LOW AS \$425
[Apply Now](#)



Welcome to Tower

CALL NOW : 718-433-2323 GET PAID EVERY DAY! INSTANT PAY FOR ALL DRIVERS!

[Apply Now](#)



[Body Shop](#)

[English](#)

HOME

RENTAL

LEASE TO OWN



METRIS / SIENNA WAV
\$639 / \$689
[Apply Now](#)

MERCEDES METRIS
AS LOW AS \$575
[Apply Now](#)

TOYOTA COROLLA
AS LOW AS \$550
[Apply Now](#)



INFINITI QX60
AS LOW AS \$675
[Apply now](#)

LUXURY
XTS/CONTINENTAL
BASED ON AVAILABILITY
...

CALL NOW : 718-433-2323 GET PAID EVERY DAY! INSTANT PAY FOR ALL DRIVERS!

[Apply Now](#)



[Body Shop](#)

[English](#)

[HOME](#)

[RENTAL](#)

[LEASE TO OWN](#)

Rental is a great option if you wish to enjoy the flexibility of short or medium term and car maintenance.



BRONX LOCATION

PHONE. 718.433.2323

EMAIL. csteam@towerny.com

ADDRESS.

35 W. 170th St.
Bronx, NY 10452

LIC LOCATION

PHONE. 718.433.2323

EMAIL. csteam@towerny.com

ADDRESS.

3121 Thomson Ave
LIC, NY, 11101
Right across LaGuardia College

© 2019 by TowerTLCRentals.

TLC Plates For Rent



We are currently renting out our TLC plates to drivers who want to use their own vehicles to drive for Uber, Lyft and other rideshare apps in NYC.

Renting a TLC plate is a much cheaper alternative to renting a TLC ready vehicle.

[APPLY NOW](#)

TLC Cars For Rent

Great Uber TLC Rental Selection in NYC. Cars For Uber & Lyft.



2017 Hyundai Sonata Hybrid

Sonata Hybrid offers an impressive array of available features that turn your driving experience into something exceptional.

From **\$495** per week

[APPLY NOW](#)

EXHIBIT B



February 2023 For-Hire Vehicle License Review

Report and Determination

Introduction

This review by the New York City Taxi and Limousine Commission (TLC) of for-hire vehicle (FHV) licenses is conducted pursuant to TLC Rule § 59A-06(a)(1) for the period of August 2022 through January 2023. TLC has conducted reviews pursuant to this rule every August and February since August 2020.¹

Local Law 147 of 2018 paused the issuance of new FHV licenses for one year with an exception for wheelchair accessible vehicles (WAVs).² During that initial one-year pause, Local Law 147 directed TLC, in conjunction with the City Department of Transportation (DOT), to study driver income, the extent to which FHVs contributed to traffic congestion, traffic safety, vehicle utilization rates, access to for-hire service in different areas of the city, driver availability, and any other topics deemed appropriate. The law also gave TLC the authority to regulate the number of FHV licenses.

In August 2019, following a report by TLC and DOT,³ TLC adopted rules⁴ to implement the report's recommendations, including by continuing the pause on new vehicle licenses, maintaining the WAV exception, and adding an exception for electric vehicles (EVs) to meet "ambitious carbon-reduction targets" and "spur the creation of high-capacity, private-sector provided charging infrastructure."⁵ These rules also require TLC to review whether additional FHV licenses should be issued—at the time every six months, now every year—based on congestion, driver pay, license attrition, outer-borough service, and any other information it deems relevant in making its determination. In June 2021, TLC amended its rules to remove the EV exception and add the availability and demand for EVs and the availability of EV charging infrastructure to the list of factors that TLC must consider in its review.⁶ In January 2023, TLC amended its rules pursuant to the decision made in the August 2022 License Pause Review to issue 1,000 new licenses for EVs, which were made available in March 2023.⁷

This review analyzes data relating to all segments of the FHV industry: high-volume for-hire services (HVs)⁸ as well as livery, black car, and luxury limousine bases. Because bases that are not HVs submit their data with a longer time lag than HVs, data in this report relating to the entirety of the FHV industry is through January 2023.

After conducting the data analysis, TLC concluded that it would wait until formulating and adopting the Green Rides Initiative rules—requiring high-volume for-hire services to dispatch exclusively

¹ All previous License Review Reports are available on the TLC website at

<https://www.nyc.gov/site/tlc/about/industry-reports.page>.

² Codified as New York City Administrative Code § 19-550.

³ New York City Taxi and Limousine Commission and Department of Transportation, *Improving Efficiency and Managing Growth in New York's For-Hire Vehicle Sector*, June 2019, available at https://www1.nyc.gov/assets/tlc/downloads/pdf/fhv_congestion_study_report.pdf.

⁴ The rules adopted in August 2019 are available at

https://www1.nyc.gov/assets/tlc/downloads/pdf/proposed_rules_hvfhs_cruising_08_07.pdf.

⁵ *Supra* note 3, p. 4.

⁶ <https://www.nyc.gov/assets/tlc/downloads/pdf/notice-of-promulgation-of-vote-06-22-2021.pdf>

⁷ https://www.nyc.gov/assets/tlc/downloads/pdf/FHV_EV_Restricted_License_Adopted_Rule_01_25_23.pdf

⁸ Two companies are currently licensed by TLC as HVs: Lyft and Uber.



to EVs and wheelchair accessible vehicles (WAVs) by 2030—to make a determination about the issuance of any new FHV licenses, as the public process for the Green Rides Initiative would help the agency determine whether new licenses were needed to meet the goals of that Initiative and address other industry issues.

Analysis

Trip Volume, Vehicle Supply, and Vehicle Attrition

As TLC has detailed in previous reports, including several previous FHV License Reviews, FHV trips have steadily increased since the pandemic's nadir in April 2020 and, as shown in the table below, are now nearing pre-pandemic levels, making evident that the demand for for-hire transportation has largely returned as the city has recovered. This three-year trend is also evident in the past six months: between July 2022 and January 2023, FHV trips increased by 5%, from 18.6 million to 19.5 million trips per month. However, HV trips are significantly closer to full recovery than non-HV FHV trips, indicating that the recovery from COVID-19 has not been spread equally across the FHV sector.

	<u>January 2020</u>	<u>January 2023</u>	<u>Percent recovery</u>
High-volume FHV trips	20,569,325	18,479,031	89.8%
Non-high-volume FHV trips	1,947,380	1,015,650	52.2%
All FHV trips	22,814,490	19,494,681	86.6%

The increased number of trips over the past six months has occurred while there has been a modest decrease in the number of licensed FHV not in storage, from 95,693 in August 2022 to 95,396 in February 2023. Including the 3,932 FHV licenses in storage, the total number of FHV licenses in February 2023 was 99,328. This is 17% lower than the 120,126 FHV licenses that were licensed when TLC decided to extend the moratorium in August 2019 and the first time that the number of FHV licenses has been under 100,000 since 2016. Of this total set of licensed FHV licenses, however, a large percentage are not performing FHV trips. While the number of vehicles performing trips has grown significantly since pandemic-era lows, 20,843 FHV licenses did not complete a trip in January 2023, and 10,275 FHV licenses did not complete a trip from May 2022 through December 2022, indicating that a substantial amount of vehicle inactivity was not short term.

From August 2022 through January 2023—the six-month period covered in this report—1,192 new FHV licenses (i.e., not renewal licenses) were issued by TLC, while 2,525 licenses expired. Of the 1,192 new FHV licenses, 79% were wheelchair accessible vehicles, 13% were lease-to-own vehicles, and 8% were Street Hail Livery (SHL) vehicles (FHV licenses attached to an SHL permit).⁹

Driver Earnings

As noted in previous License Reviews, drivers for HV bases—the only FHV class for which the submission of driver pay data is required—experienced a severe initial drop in earnings at the beginning of the pandemic due to the significant reduction in passenger demand. Driver gross earnings have substantially recovered since then as passenger demand returned, and have been consistently above

⁹ Expired license numbers can change over time because licensees are still eligible to renew their license 60 days after the license expires and once renewed have an additional 120 days to pass a vehicle inspection.



**Taxi & Limousine
Commission**

\$1,100 per week since early 2021. The same trends are seen in aggregate driver pay numbers, with drivers being paid over \$334 million in January 2023, higher than any pre-pandemic month.

While high-volume FHV driver pay is regulated through TLC's minimum driver pay rules, and those rules include a component for driver expenses, one driver expense particularly relevant to the analysis in this report is vehicle and rental expenses, as drivers who are unable to obtain their own licenses can rent a vehicle from another party. These rental expenses, while typically including the vehicle, insurance, maintenance, TLC licensure, and so on, can be higher than the costs of owning one's own TLC-licensed vehicle. Rental costs, as reported by drivers and rental companies, are typically over \$400 per week, and can be much higher based on factors including the vehicle class (luxury, SUV, etc.), make, and model.

Outer-Borough Service

Since the previous review conducted in August 2022, HV trips—the FHV trips for which location-based data is most robust and reliable—have steadily increased in each borough. While the strongest growth was in Staten Island and the Bronx, all boroughs saw growth between July 2022 and January 2023.

<u>Borough</u>	<u>July 2022</u>	<u>January 2023</u>	<u>Percent change</u>
The Bronx	2,053,315	2,214,288	+7.8%
Brooklyn	4,618,121	4,823,385	+4.4%
Manhattan	7,225,081	7,612,743	+5.4%
Queens	3,605,909	3,719,651	+3.2%
Staten Island	256,614	286,914	+11.8%

Despite the strong trip growth in all boroughs, passenger wait times for high-volume trips have remained stable, with a citywide average of 4.7 minutes in January 2023, remaining within the 4.5–6.6-minute range seen since 2018. Average wait times by borough in January 2023 were all between 4.3 and 5.6 minutes, suggesting that outer-borough service levels have not been an issue.

Electric Vehicles and Charging Infrastructure

TLC is focused on facilitating the transition of all of its licensed vehicles to EVs. To that end, TLC first and foremost encourages current FHV license holders to convert their vehicles to EVs. Furthermore, TLC is working with stakeholders including drivers, fleets, base owners, auto manufacturers, Con Ed, charging infrastructure providers, and agency partners such as DOT, the Department of Citywide Administrative Services, and the Port Authority to increase the amount of EV charging available in New York City in order to meet current and future demand. As of early March 2023, there were 1,125 licensed FHV EVs; as of September 2023 there were 2,443 FHV EVs, and that number continues to grow.

TLC determined in its August 2022 License Review to issue up to 1,000 new FHV licenses that would be limited to use with EVs. After a rulemaking process, statements of interest were made available in March 2023 first to TLC-licensed drivers who do not already own their own vehicles and then to any person or business. This process demonstrated significant unmet demand for FHV EVs and was the best indication to date of the demand for EV-restricted licenses.

As the demand for EVs increases, charging infrastructure is also rapidly expanding in New York City as public and private sector investment continues to change the landscape. DOT, the New York Power Authority, and the Department of Citywide Administrative Services offer affordable fast charging for TLC



Taxi & Limousine Commission

drivers in several convenient locations throughout the city.¹⁰ Additionally, TLC has committed to opening fast chargers at its Woodside inspection facility, and DOT has begun installing hundreds of curbside level 2 chargers—which are particularly useful for overnight and off-shift charging—in all five boroughs.¹¹ Significant investment in charging infrastructure is also coming from the private sector, including TLC-licensee Revel which announced plans to open five new publicly available charging hubs in locations convenient to TLC-licensed drivers throughout the city in addition to its existing hub in Brooklyn.¹² Issuing new FHV licenses could increase charger utilization and help spur additional private investment in charging infrastructure.

Finally, following TLC's *Charged Up!* report in December of 2022,¹³ Mayor Eric Adams and TLC announced that all trips dispatched by high-volume companies will be dispatched by electric vehicles or wheelchair accessible vehicles by 2030, with benchmarks beginning in 2024.¹⁴ TLC held a public hearing on the proposed rules on September 20, 2023, at which drivers, environmental groups, an economist, and the high-volume companies urged the issuance of additional EV-restricted FHV licenses to make compliance with the rules feasible and address other industry issues such as high leasing costs for drivers. TLC believes that the issuance of new EV-only licenses in addition to WAV-only licenses, especially in the next two years, is essential to begin the large-scale conversion of the FHV sector to EVs and spur demand for charging infrastructure. In fact, the overwhelming majority of the current FHV EV fleet operates under EV-only licenses issued when the EV exception was in place or when TLC issued 1,000 new EV-only licenses pursuant to its August 2022 License Review.

Traffic Congestion

Data from DOT indicate that bridge and tunnel traffic into the central business district (CBD) remains close to pre-pandemic levels. Furthermore, monthly Midtown traffic speeds, which rose in 2020 in the wake of the pandemic, have been decreasing year over year, reaching pre-pandemic lows in Fall 2022.¹⁵ As discussed in previous reports, the return of congestion shortly after the initial onset of the pandemic occurred while FHV trip counts remained low, indicating that the FHV industry played a smaller role in 2020–21 congestion than it had previously. As FHV trip volumes are now near pre-pandemic levels, the role of the FHV industry in the city's congestion is likely similar to what it was before the pandemic, as analyzed in the 2019 TLC and DOT report.¹⁶

Conclusion

TLC has conducted a thorough review of the state of the city's FHV industry, including assessing trip volumes, vehicle supply, traffic congestion levels, driver earnings, license attrition rates, outer borough service, and electric vehicles and charging infrastructure. Vehicle licenses continue to decrease while passenger wait times have remained steady, and trips and driver pay continue to increase. The demand for electric vehicles is growing rapidly, and TLC has new rules to require an increasing percentage

¹⁰ <https://www.nyc.gov/html/dot/downloads/pdf/dc-fast-charging-station-faq.pdf> (DOT);
<https://www.nyc.gov/assets/dcas/downloads/pdf/fleet/electric-vehicle-public-charging-rules.pdf> (DCAS);
<https://evolveny.nypa.gov/en/about-evolve-new-york> (New York Power Authority)

¹¹ <https://www.nyc.gov/html/dot/downloads/pdf/curbside-level-2-charging-pilot-faq.pdf>

¹² <https://www.amny.com/transit/revel-five-new-ev-charging-superhubs-across-nyc/>

¹³ https://www.nyc.gov/assets/tlc/downloads/pdf/Charged_Up!_TLC_Electrification_Report-2022.pdf

¹⁴ https://www.nyc.gov/assets/tlc/downloads/pdf/green_rides_initiative_%20with_certifications_8_14_23.pdf

¹⁵ Communication with DOT, March 10, 2023.

¹⁶ See supra note 3.



**Taxi & Limousine
Commission**

of HV trips in EVs and WAVs, which will help address the City's need to spur additional EV charging infrastructure. Finally, since the pause was initially put into place over five years ago, there are other tools that limit the oversupply of vehicles—including minimum driver pay rules, a congestion surcharge, changed financial dynamics for HV companies, potential new congestion pricing fees, and the ability to restrict new licenses to EVs. Following this analysis, TLC has determined that the industry can absorb new EV-only vehicles without undermining the gains that the license pause has achieved.

Accordingly, TLC will reinstate the exemption to the FHV license pause for electric vehicles that was in place from 2019 to 2021. **Effective immediately, applicants can apply for new EV-only FHV licenses through the standard FHV license application process.** Applicants can continue to apply for WAV-only FHV licenses as they have since 2018. These new licenses will help electrify the TLC-licensed fleet, help drive the demand for, and spur the development of, more private investment in charging infrastructure, allow drivers to avoid the volatility and high costs of gasoline, provide drivers currently stuck renting with an opportunity to own their own vehicles, introduce competition in the rental market, and help HV companies comply with the requirements of the Green Rides Initiative. As these licenses are put into use, TLC will monitor the impact that these new licenses have on the factors addressed in this report.