



February 16, 2024

Yesenia Torres  
Disability Service Facilitator  
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Filed At: <https://accessibilityplans.cityofnewyork.us/tlc/>

Re: Draft of New York City Taxi and Limousine Commission  
Proposed Five-Year Accessibility Plan, Posted On Or About  
December 29, 2023

Dear Ms. Torres,

Disabled In Action of Metropolitan New York, Inc. ("DIA") submits these comments in response to the New York City Taxi and Limousine Commission's ("TLC") request for comments concerning its Proposed Five-Year Accessibility Plan ("Plan"), posted online on or about December 29, 2023.

DIA is a fifty-one (51) year old, 501(c) (3), grassroots, civil rights organization run by and for people with disabilities. DIA's mission is to eliminate discrimination for people with all kinds of disabilities.

**Disability Services Facilitator – DSF:**

Significantly, the TLC Plan does not mention the name, email address, phone number and mailing address of the Disability Services Facilitator. The TLC Plan only states that such a position exists. This is a glaring omission. Other agency plans talk about their Disability Services Facilitator, the DSF job duties and anyone else associated with disability and include their name, email address, phone number and mailing address. The TLC Plan must include the name, email address, phone number and mailing address of the Disability Services Facilitator as well as the unit the Disability Service Facilitator position is a part of. The public needs to know this information. Thus, all this important information needs to be stated in the TLC Plan.

**Digital Inclusion Officer – DIO:**

In the TLC Plan the part about the Digital Inclusion Officer is written in the future as if this job is being posted, yet you named the person. That is confusing. Additionally, it needs to be stated in the TLC Plan the unit this position is in.

**Physical Access to 33 Beaver Street:**

The TLC Plan mentions that things were done for doorway access. The TLC Plan should state when and specifically what was done to make doorways accessible at 33 Beaver Street.

**Workplace Inclusion:**

Why aren't existing employees required to take the Disability Etiquette course rather than "encouraged?" All employees should be required to take the Disability Etiquette course.

**Restroom Signage At Beaver Street:**

At 33 Beaver Street, the TLC needs to have better signage to the accessible restroom from the conference room and hearing room. The accessible restroom should be open without a key when the public is there. The TLC Plan should state when improved signage to the accessible restroom from the conference room and hearing room at 33 Beaver Street will be done and state that how the TLC will ensure that the accessible restroom is available without a key when members of the public are at this office.

**Programmatic Access:**

The TLC Plan on Programmatic Access does not address to what extent it has provided access to people with disabilities with respect to service or lack thereof provided by taxis, for hire vehicles ("FHV") (they are community-based liveries, black car and luxury limousines), commuter vans and paratransit vehicles; all of which TLC is responsible for licensing and regulating in New York City. The TLC Plan does not address but needs to include what is being done to promote accessibility for riders with disabilities in the training and licensing of the drivers of these vehicles.

Further, with respect to the Green Initiative, the TLC Plan needs to specifically state the TLC's plan of action for making such vehicles accessible and readily available to people with disabilities when electronic vehicles flood the street so that people with disabilities will be able to get a ride and are afforded access on an equal basis compared with other members of the public.

In the TLC Plan, there is no mention of accessibility and effectiveness of driver training that TLC oversees with respect to the drivers of taxis, for hire vehicles and other vehicles regulated by the TLC. True, the TLC does not provide the driver training directly but the TLC is responsible for making the curriculum and overseeing the training and evaluating it. Thus, the TLC Plan should include information on what the training includes regarding accessibility, disability etiquette and safety.

For instance, many for hire and taxi drivers do not have the wheelchair securement devices as well as seatbelts and shoulder belts needed to secure people with disabilities and their wheelchairs. Further, many times people with disabilities encounter for hire and taxi drivers who lack knowledge to secure our wheelchairs and the people in them and tell passengers with disabilities that use a wheelchair that their wheelchair seatbelt is sufficient. Thus, the TLC Plan needs to discuss in detail how and when these issues that people with disabilities experience will be corrected.

Additionally, the inability to make a complaint to the TLC on the 311 link about a FHV that is not a green or yellow taxi that the TLC's website directs people to needs to be addressed in the TLC Plan. The TLC Plan needs to state how and when it will correct this problem. We submit that it would provide better access to the public, including people with disabilities, to make a complaint regarding service were the TLC to establish a place on its website that a passenger could make a complaint about any of the vehicles and drivers the TLC issues licenses to and regulates.

There is a safety issue when drivers do not speak English and it is impossible to communicate with them. Many people with different kinds of disabilities need to communicate with their drivers.

**Workplace Safety:**

The TLC Plan needs to include an emergency evacuation plan for both employees with disabilities and visitors with disabilities. The inclusion of an emergency evacuation plan in the TLC Plan should state that all TLC staff need to be trained on what to do if a disabled person needs to evacuate in an emergency. We suggest that that TLC Plan should state that employees should be allowed to self-identify if they require assistance and be sent an email from the Fire Safety person each day to account if they are physically in the office. That way, no one will be looking to help someone who is not there. The emergency evacuation plan in the TLC Plan should state that all employees need to be trained on how to evacuate people with different disabilities in emergencies and trained on how to safely transfer a person to an evacuation chair and how to safely operate an evacuation chair.

The TLC needs to have an evacuation chair in a location easily accessible and very near to the workstation/office of self-identified employees with mobility disabilities. An additional evacuation chair that could be used by other employees and visitors in an emergency evacuation should be located in a visible and easily accessible place on every floor the TLC occupies. The emergency evacuation plan in the TLC Plan should state when evacuation chairs will be acquired, when all employees will be trained on what this is and how to properly operate it.

Finally, the TLC Plan should state that signage instructing visitors on what to do in the case of an emergency will be posted in an easily seen location in large print and Braille and the date by which this will be accomplished.

Thank you for the opportunity to comment on this Plan since equal access to all New York City's services, activities and programs is important to all New Yorkers. If you would like additional information or have any questions, please do not hesitate to contact DIA at [info@disabledinaction.org](mailto:info@disabledinaction.org).

Thank you for your continued work on behalf of all of us.

Very truly yours,

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