



**Testimony of Aziz Bah
Organizing Director
Independent Drivers Guild (IDG)
Hearing on the Proposed Green Rides Initiative
Before the NYC Taxi and Limousine Commission
September 20, 2023**

Good morning, my name is Aziz Bah, I am a for-hire vehicle rideshare driver and the Organizing Director of the Independent Drivers Guild (IDG). Thank you for this opportunity to testify before you today regarding the proposed Green Rides Initiative which will require all high-volume for-hire vehicles to be either zero emission (EV) or wheelchair accessible (WAV) by 2030.

As you know, The IDG is a nonprofit affiliate of the International Association of Machinists and Aerospace Workers (IAMAW), and our organization represents over 140,000 for-hire vehicle drivers in New York State and 250,000 in Connecticut, Massachusetts, New Jersey and Illinois. The IAMAW is the only union to successfully organize black car workers in New York City and has been doing so for over twenty years.

As drivers and New Yorkers, IDG is in full support of a cleaner future for our city, and it starts with bold initiatives like this. We appreciate Mayor Adams promising in his Working People's Agenda, unveiled last January, that our city's hardworking drivers wouldn't bear the cost of this initiative. However, the proposed rules do not live up to this promise as they do not provide any protections for drivers in the case of market fluctuations in price that impact affordability or in the case of a lack of sufficient charging infrastructure.

Moreover, the fact that taxis are exempt from these rules is just plain unfair and creates an inequity within an industry that screams for equitable treatment of all sectors. TLC has decided to put the responsibility of complying with these rules on the HVFHV companies – which do not own or lease the cars in question -- but has exempted medallion fleet owners who actually own their cars and have direct control, ability and means to comply with this law. And unlike HVFHV companies and drivers, medallion fleet owners actually have parking lots and garages

in the boroughs that can easily provide for the installation of hundreds if not thousands of charging stations. TLC has much more explaining to do on this front.

The proposed rules attempt to put the onus on the HVFHV companies, Uber and Lyft, to be in compliance with the requirements even though ultimate compliance will fall upon the hard-working, struggling drivers who are the ones who purchase and lease the vehicles. And the rules do nothing to require Uber and Lyft to install charging stations or to assist drivers. And while these companies have stated their support for this initiative, they have yet to explain how they intend to assist drivers if affordability or availability becomes an issue or how they plan to help the city build charging stations for drivers.

What assurances do we have that TLC will act in a timely fashion or have the authority to act if drivers find themselves in an untenable situation? All we have is a vague promise in the Statement of Basis and Purpose that TLC will monitor the “ever-changing” EV situation and make adjustments accordingly. And while we trust this Administration and this TLC Commissioner, as history has taught us, we cannot afford to be at the mercy of another future unpredictable or unreasonable commissioner. A detailed and phased plan not only needs to be set out in the rules but if certain goals regarding EV affordability or charging infrastructure are not met, then the program needs to be paused and the next phase not implemented.

Although the initiative’s timeline does propose a gradual transition to zero-emission electric vehicles over the next 7 years, it lacks the necessary and specific planning details and commitments regarding the installation of charging stations and how drivers will have access to them. The availability of charging station infrastructure, particularly in the neighborhoods within the boroughs where drivers reside, and the level of charging these stations will offer --1, 2, or 3, being the fastest, are of top concern.

If charging stations are placed on sidewalks in areas where drivers live, enforcement also becomes a significant issue. How will the city enforce parking and charging regulations at these charging stations, especially in areas where parking is already limited, and most drivers live in apartment buildings without dedicated parking spaces? Managing work time, charging, and vehicle relocation can become a significant logistical burden that we cannot take lightly.

Ensuring that there are enough charging stations with parking in outer boroughs, particularly those equipped with Level 3 charging for faster turnaround times, is essential as overnight charging may not be feasible for drivers without access to private garages.

As we have noted before, the lack of sufficient relief stations for FHV drivers throughout the city is a real issue. Drivers already face issues with places to park and take a break with bathrooms and running water without getting a ticket. Now add a lack of charging in areas that are needed, and this just compounds the difficulties that drivers will face on a daily basis. As part of the Green Rides Initiative, TLC and DOT need to build new relief stands to FHV drivers throughout the boroughs with Level 3 charging stations – ASAP. Moreover, TLC and DOT need to work with the city’s parking garage industry to develop a plan for low-cost or free use of garages for overnight charging.

If and when TLC decides to lift the license moratorium and issue more EV and WAV vehicle licenses, such licenses MUST be offered to individual drivers and not leasing companies, HVFHV companies or fleets. TLC's priority and policy must be to foster and assist drivers with ownership and get out from under the thumb of predatory companies that continue to exploit our drivers.

While the NYS Drive Clean rebate and Federal Tax Credit of up to \$7,500 for purchasing an electric vehicle are generous incentives, we do not believe these will be sufficient to ease the upfront cost burden, particularly for those drivers being forced into new leasing programs.

In sum, the mandate to transition the entire fleet of HVFHVs to EV or WAV vehicles by 2030 faces significant challenges and concerns related to overall planning, charging infrastructure, affordability for drivers, enforcement, parking logistics and inequitable treatment within the industry. IDG stands ready to work with Commissioner Do and his very capable team in addressing these concerns. Providing greater transparency while tying the rules to specific milestones is vital to ensure the successful and equitable implementation of a cleaner and more sustainable transportation system in New York City.

Thank you again for all your hard work and for giving us the time to discuss these matters with you.

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36-04 Skillman Ave #3
Long Island City NY, 11101
718.841.7330 | info@drivingguild.org
Drivingguild.org | @drivingguild

The guild is an IAMAW affiliate representing app-based drivers. We are Uber and Lyft workers united for a fair for-hire vehicle industry.