We Want The NYC Taxi Rates on The Doors

Scroll Down to get the history of how it was taken off



No Fare for Consumers
by Larry Fisher

Over ten years ago, the Taxi and Limousine Commission made a monumental decision, although it looked like a trivial matter. Allegedly, in the interest of aesthetics, Chairman David Yassky decided to redesign the exterior of the iconic yellow taxi fleet in New York City. No longer would the outside of the cab say "Taxi," but instead, the bold and black "T" would represent the word taxi. That a consumer might get confused by the lack of the word taxi on the vehicle was a minor point.

Simultaneously, Yassky also removed the rate of fare decals indicating the mileage and time charges a consumer could expect from a taxi ride. This was a particularly suspicious maneuver since only a short time before, there were several media sensationalized stories regarding drivers overcharging customers. Why would the TLC, as representative of the city, believe it was in the best interest of the consumer to hide the potential fare to the rider?

Councilman James Vacca, then City Council Transportation Committee Chairman, opposed this idea. "I think passengers have a right to know before they get in a cab what the fare would be," Vacca said. TLC officials testified at a hearing his committee held on these issues. They said, "the printed rates are confusing and ugly and that TV monitors inside taxis will soon show riders the rates in real time during their rides." So, the TV monitors, which later became the most annoying aspect of taxi rides, basically replaced the rate of fare decals.

Ashwini Chhabra, a TLC Deputy Commissioner who later left the TLC to work for the app companies, said at the time, "Since the final cost of a trip is really a formula that depends on traffic, per-mile fares can be misleading to passengers." So, Chhabra's solution to disclosing the rate of fare was to hide it. Makes no sense, unless, of course, the intent was to blur the lines of what is a taxicab and what is not. Then it makes perfect sense.

A few years later, Abe Mittleman, the owner of a medallion, and the publisher of NYC TAXINEWS.COM, petitioned the city in an attempt to reinstate the decals on the exterior of the taxi cabs indicating the rate of fare for taxis. The TLC's answer to Mittleman's petition then, in 2018, was no. This time, the purported excuse was that the TLC was examining the potentiality of dynamic or flexible pricing and showing fixed rates on the taxis would be counter to that initiative. Initiative? What initiative? Is there any evidence that this was ever a potential reality? Talk about an idea ripe for abuse. Ever hear of exorbitant Uber rides during high demand periods or emergencies?

So, to sum up, let's go back to basics. Let's put the the T word back on the vehicles. We spell it TAXI. And furthermore, let's put the metered rate of fare back on the rear doors of our iconic vehicles because the long history of yellow medallion taxis is pro-consumer. The bad apples get caught doing bad things and are dealt with by law enforcement. The consumer deserves to know what they're paying for. Ahead of time. No surprises at the end, like a hospital stay. You ever order an item in the restaurant that has no price tag? I always ask how much. I don't like being abused, and neither should taxi passengers.

February 6th, 2018

ATTN: Commissioner Meera Joshi
New York City Taxi and Limousine Commission
33 Beaver Street
New York, NY 10004

PETITION TO PUT THE RATE OF FARE BACK ON THE DOORS OF TAXICABS

PETITION

Pursuant to Chapter 52 of the Rules of the City of New York, specifically §52-14, I, Abe Mittleman, a medallion owner, hereby petition the New York City Taxi and Limousine Commission (the "TLC") to consider the adoption of a revised rule pertaining to Taxicab rate of fare decals on the doors of Taxicabs.

PROPOSED LANGUAGE

§58-32 Vehicle – Markings & Advertising

(i) *Marking specifications for Taxicabs*.

INSCRIPTION*	**LOCATION**	**SIZE**
(a) Rate of fare decals (required). (Non-detachable type only).	Both rear doors centered left to right and located in the upper half of the flat surface between the bottom edge of the door and the door handle. The base line of the rate of fare and taxicab logo decals shall be parallel and the same distance to the bottom door edge.	The size of the approved rate of fare decals shall be determined by the Commission.

STATEMENT OF THE TLC'S AUTHORITY TO PROMULGATE THE RULE AND ITS PURPOSE

The Commission's authority to promulgate the proposed amendment to rule §58-32 Vehicle – Markings & Advertising is set forth in Chapter 65, §2303 of New York City Charter, in this

instance specifically §2303(a), b(2), (b)(6) and (b)(9)[1]. The Commission's authority to promulgate the proposed amendment is also found in Chapter 52 of the Rules of the City of New York, in this instance specifically §52-04(a)(1) and (a)(2)[2].

The purpose of the proposed rule is to return the rates back to the doors, to inform consumers of the rate of fare before they enter into a Taxicab, and in effect, to help both drivers and owners by informing people of the rate of fare at a glance.

ARGUMENT IN SUPPORT OF PETITION

Historically, the rates of fare have always been on the doors of Taxicabs. From a practical perspective, this makes sense because passengers should be able to know *before* they get into a Taxicab what the rates are, and they should be able to decide in advance of getting into a Taxicab whether they want to pay the rate or not. This logic is sound, and is implemented in many other

---

[1] NYC Charter **§2303 Jurisdiction, powers and duties of commission.**

a. The jurisdiction, powers and duties of the commission shall include the regulation and supervision of the business and industry of transportation of persons by licensed vehicles for hire in the city, pursuant to provisions of this chapter…

b. Such regulation shall extend to: …

> **2.** The regulation and supervision of standards and conditions of service. …
>
> **6.** Requirements of standards of safety, and design, comfort, convenience, noise and air pollution control and efficiency in the operation of vehicles and auxiliary equipment. …
>
> **9.** The development and effectuation of a broad public policy of transportation affected by this chapter as it relates to forms of public transportation in the city, including innovation and experimentation in relation to type and design of equipment, modes of service and manner of operation.

[2] Rules of the City of New York, **§52-04 Specific Powers and Duties of the Commission**

(a) Powers and Duties with Respect to Regulating

> (1) Formulate and adopt rules reasonably designed to carry out the purposes of the Commission
>
> (2) Set and enforce standards and conditions of service.
>
> (3) Establish and enforce standards of safety, comfort, convenience, operational efficiency, and compliance with good public policy in the design of vehicles and auxiliary equipment…
>
> (8) Encourage and provide procedures to encourage innovation and experimentation relating to type and design of equipment, modes of service and manner of operation.
>
> (9) Provide assistance to the public transportation businesses and industries regulated by the Commission to continually develop and improve public service, safety, and convenience, including assistance in securing federal and state grants.

industries. For example, the Metropolitan Transit Authority has the rate of fare listed on the outside of their buses. Restaurants have their menus posted in windows so people can decide whether or not they want to eat there. Presently, potential Taxicab passengers have no way of knowing anything pertaining to the rate of fare, other than that the fare is a "metered fare." This is not only inconvenient; because of the limited information presented, potential taxicab passengers are left with uncertainty. Because there are no rates on the doors, there may be room to doubt the consistency or honesty of a fare calculation; tourists are often forced to ask third parties (i.e. unscrupulous hotel doormen that may be incentivized to send business to black cars) what the rate of fare is; all this leads to loss of fares for medallion owners and drivers, as well as potentially unpleasant surprises for passengers. We need the rates back on the doors.

The rule change I am asking for is most practical. I am only asking this Commission implement some common sense, the same common sense it did for so many years. The rates should have never come off the doors to begin with. Ashwini Chhabra, Former Deputy Commissioner of Policy and Planning for TLC, seems to have led the charge on the removal of the rates from the doors. He testified that "*displaying the rate of fare on the exterior of the taxi, this is certainly one of those ideas that made sense at one time but no longer does…. [it] is potentially confusing if posted on a taxi door."*[3] The speculative position taken- that it may be "potentially confusing" to people considering a Taxicab ride, is not itself a reason to keep the rate of fare off the doors. There were no complaints about the rates being on the door from drivers or passengers; the genesis of this change is a real 'head-scratcher.'[4] Mr. Chhabra went on to say: "*[e]ach [taxi] is equipped with a passenger-facing TV screen, and each trip begins with a display of the rate of fare on those screens… passengers have the option, at any point during their trip, to read a more detailed onscreen explanation of the various rates of fare…[t]his does more to educate and protect consumers than any exterior decal, glimpsed briefly prior to entering a taxi, possibly could.*"[5]

While giving a breakdown of fares to a passenger that is *already inside* a Taxicab is helpful, this is totally different than a passenger viewing an exterior decal and making an informed decision *before* getting into a cab. The two are not mutually exclusive. Rates can be both inside a cab, and outside a cab. This is a change that should never have happened— again, the removal of the rates from the doors was not prompted by any complaints by customers, drivers, or medallion owners. This was a questionable decision at best, made by a former TLC employee that went to

---

[3] Testimony of Ashwini Chhabra, Deputy Commissioner, Policy & Planning at NYC Taxi & Limousine Commission, regarding INTRO 929-A, in relation to posting information on the exterior of vehicles for hire. November 26th, 2012; *http://home2.nyc.gov/html/tlc/downloads/pdf/testimony_11_26_12.pdf*

[4] The Verge, May 20th, 2014, ***New York City's taxi policy chief just defected to Uber***, https://www.theverge.com/2014/5/20/5734308/new-york-citys-taxi-policy-chief-just-defected-to-uber

[5] Testimony of Ashwini Chhabra, Deputy Commissioner, Policy & Planning at NYC Taxi & Limousine Commission, regarding INTRO 929-A, in relation to posting information on the exterior of vehicles for hire. November 26th, 2012; *http://home2.nyc.gov/html/tlc/downloads/pdf/testimony_11_26_12.pdf*

work for Uber within three days of leaving the TLC.[6] The removal of the rates of fares has done nothing to help the Taxicab drivers, owners, or passengers.

This same logic - that customers should know the price *before* they buy into anything - was applied by this Commission when discussing Uber's surge pricing. Commissioner, you have even noted regarding surge pricing: "*The aim of these rules is to give the passenger complete information so a passenger makes a decision upfront whether it's a price they want to pay or not."*[7] This same logic applies to Taxicabs. Taxicab passengers should know the price *upfront*. *"This is about disclosure and then the individual passenger can make a decision based on the information they get."*[8] I couldn't agree more with this logic, and that is why I am asking for the rate of fare to be put back on the doors.

THE PERIOD OF TIME THE RULE SHOULD BE IN EFFECT

This rule should be in effect indefinitely, subject only to changes in the actual rate of fare.

PETITIONER:

Thank you for your consideration of this proposed rule.

Respectfully submitted,

_____

Abe Mittleman

---

[6] N.Y. Post, October 15th, 2014, ***City probing ex-TLC official after jump to Uber*** *https://nypost.com/2014/10/15/ex-tlc-official-being-probed-by-city-after-jump-to-uber/*

[7] Taxi and Limousine Commission Meeting May 28, 2015; *http://www.nyc.gov/html/tlc/downloads/pdf/transcript_05_28_15.pdf*

[8] *Id*.

NYC
Taxi & Limousine Commission

Meera Joshi
Commissioner

Christopher Wilson
Deputy Commissioner/
General Counsel
Legal Affairs

33 Beaver Street
22nd Floor
New York, NY 10004

+1 212 676 1135 tel
+1 212 676 1102 fax

February 27, 2018

Mr. Abe Mittleman

Re: Petition to Put the Rate of Fare Back on the Doors of Taxicabs

Dear Mr. Mittleman:

On February 13, 2018, the New York City Taxi and Limousine Commission (TLC) received your above referenced Petition, No. 18-001, addressed to Commissioner Meera Josh asking her to consider the adoption of a revised rule, Sec. 58-32 Vehicle – Markings & Advertising, pertaining to Taxicab rate of fare decals on the doors of Taxicabs. Six years ago, the same Vehicle Markings and Advertising rules were eliminated. Commissioner Joshi has considered your petition and ultimately decided it should be denied.

The TLC presently is in the process of exploring flexible fare structures, which may eliminate the need for fare decals, just as having such data on the TLC website has eliminated the need for fare decals.

We appreciate the thought you have put into this submission and your interest in providing fare information to taxicab passengers.

For the reasons set forth above this petition is rejected as authorized by Section 52-15 of the TLC Rules. As required by rule we are providing copies of your current petition and this denial to the Commissioners.

Sincerely,

Aileen J. Fox

Aileen J. Fox
Assistant General Counsel and Managing Attorney