

NEW YORK CITY TAXI AND LIMOUSINE COMMISSION

Notice of Public Hearing and Opportunity to Comment on Proposed Rules

What are we proposing? The Taxi and Limousine Commission (“TLC”) is proposing to amend its rules that govern the ways in which a non-accessible vehicle can be converted to a Wheelchair Accessible Vehicle.

When and where is the Hearing? TLC will hold a public hearing on the proposed rule. The public hearing will take place at 10:00 am on September 3, 2025. The public hearing will be held online using Zoom. There will be no in person public hearing. The public hearing will be livestreamed on TLC’s website at www.nyc.gov/tlc. To participate in the public hearing, please e-mail the TLC at tlcrules@tlc.nyc.gov or call TLC at 212-676-1135 by 5:00pm on September 2, 2025. After you have signed up to speak, TLC will provide you with a Zoom URL to enter in on your computer or dial-in via phone number if you prefer to call in.

How do I comment on the proposed rules? Anyone can comment on the proposed rules by:

- **Website.** You can submit comments to the Taxi and Limousine Commission through the NYC rules website at www.nyc.gov/nycrules.
- **Email.** You can email comments to tlcrules@tlc.nyc.gov.
- **Mail.** You can mail comments to the Taxi and Limousine Commission, Office of Legal Affairs, 33 Beaver Street – 22nd Floor, New York, NY 10004.
- **Fax.** You can fax comments to the TLC at 212-676-1102.
- **By speaking at the hearing.** Anyone who wants to comment on the proposed rule at the public hearing must sign up to speak. You can sign up before the hearing by calling 212-676-1135. You can speak for up to three minutes. Please note that the hearing is for accepting oral testimony only and is not held in a “Question and Answer” format.

Is there a deadline to submit written comments? Yes, you must submit written comments by September 3, 2025.

Do you need assistance to participate in the Hearing? You must tell the Office of Legal Affairs if you need a reasonable accommodation of a disability at the Hearing. You must tell us if you need a sign language interpreter. You can tell us by mail at the address given above. You may also tell us by telephone at 212-676-1135. Advance notice is requested to allow sufficient time to arrange the accommodation. Please tell us by September 2, 2025. This location has the following accessibility option(s) available: Simultaneous transcription for people who are deaf or hard of hearing and audio only access.

Can I review the comments made on the proposed rules? You can review the comments made online on the proposed rules by going to the website at www.nyc.gov/nycrules. A few days after the hearing, copies of all comments submitted online, copies of all written comments, and a summary of oral comments concerning the proposed rule will be available to the public at the Office of Legal Affairs.

What authorizes the Commission to make this rule? Sections 1043 and 2303 of the City Charter and Section 19-503 of the New York City Administrative Code authorize the Commission to make this proposed rule. This proposed rule was not included in TLC's regulatory agenda for fiscal year 2025 because it was not contemplated when the Commission published the agenda.

Where can I find the Commission's rules? The Commission's rules are in Title 35 of the Rules of the City of New York.

What rules govern the rulemaking process? TLC must meet the requirements of Section 1043 of the City Charter when creating or changing rules. This notice is made according to the requirements of Section 1043 of the City Charter.

Statement of Basis and Purpose

The TLC is proposing rules that would update the modification process that vehicle converters can use when converting a non-accessible vehicle to a Wheelchair Accessible Vehicle ("WAV") for use as a Taxicab or as a For-Hire Vehicle.

The specifications for converting accessible vehicles are currently structured in a way that contemplates a different set of standards according to whether the entity performing the vehicle modification is: 1) a secondary manufacturer, or 2) some entity other than a secondary manufacturer. This distinction is confusing and not required by TLC's standards of conversion—all vehicles need to be converted using the same standards.

This rule package would simplify the structure of the rules governing conversion and in doing so will make them easier to understand, easier to explain to companies capable of performing vehicle conversions, and easier to enforce.

This rule package is also designed to promote competition among private entities that may wish to perform vehicle conversions in the for-hire market in New York City. TLC rules currently allow for National Highway Traffic Safety Administration-approved vehicle manufacturers to perform non-accessible vehicle conversions. This rule change would add NHTSA-approved vehicle modifiers to perform conversions, in addition to vehicle manufacturers.

By opening the playing field of potential market entrants, and by promoting competition through clear guidance and enforceable standards, the TLC hopes to leverage the size of the New York City market to ultimately allow for greater options for vehicle owners seeking to convert non-accessible vehicles to WAVs—both here in New York City and elsewhere.

TLC's authority for these rules is found in sections 1043 and 2303 of the New York City Charter and section 19-503 of the New York City Administrative Code.

New material is underlined.

[Material inside brackets indicates deleted material.]

Section 1. Paragraph (4) of subdivision (b) of section 59C-04 of Title 35 of the Rules of the City of New York is amended to read as follows:

(4) Exception regarding bumpers: A bumper modified to allow installation of a rear-entry ramp may be approved if it satisfies either of the following:

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(i) Modification by secondary manufacturer:

- a. The rear bumper is reinforced.
- b. The modification is approved by the vehicle manufacturer.
- c. The modification meets or exceeds Federal Motor Vehicle Safety Standards crash testing requirements.
- d. Any rear door lock modifications must meet the Federal Motor Vehicle Safety Standards and the lock must be attached to the chassis, not the ramp, unless a secondary lock is attached to the chassis.

(ii) Modification by other than secondary manufacturer:

- a. The rear bumper is reinforced.
- b. The modification is approved by the vehicle manufacturer.
- c. The modification meets or exceeds Federal Motor Vehicle Safety Standards crash testing requirements.
- d. The modifier must retain an engineer with at least a bachelors degree in either mechanical engineering or electrical engineering with at least 3 years' experience in automotive manufacturing to certify that each vehicle was modified using the design tested to meet or exceed Federal Motor Vehicle Safety Standards crash testing requirements.
- e. A separate certification from such engineer for each vehicle must be presented to the TLC indicating that the requirements set forth in items a through c of this subparagraph have been met.
- f. Any rear door lock modifications must meet the Federal Motor Vehicle Safety Standards and the lock must be attached to the chassis, not the ramp, unless a secondary lock is attached to the chassis.

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i. The rear bumper is reinforced.

ii. The modification meets or exceeds Federal Motor Vehicle Safety Standards crash testing requirements.

- iii. Any rear door lock modifications must meet the Federal Motor Vehicle Safety Standards and the lock must be attached to the chassis, not the ramp, unless a secondary lock is attached to the chassis.
- iv. The modifier must retain an engineer with a bachelor's degree in mechanical engineering with at least 3 years of experience in automotive manufacturing to certify that each vehicle was modified using the design tested to meet or exceed Federal Motor Vehicle Safety Standards.
- v. Separate certification for each vehicle must be presented when the vehicle is submitted to TLC as a Wheelchair Accessible Vehicle.

Section 2. Subdivision (c) of section 59C-04 of Title 35 of the Rules of the City of New York is amended to read as follows:

- (c) The Accessible Vehicle, as manufactured by the original equipment manufacturer ("OEM") or as modified by a[n OEM- approved or] National Highway Traffic Safety Administration ("NHTSA")-registered second stage manufacturer (or vehicle modifier), must meet all applicable Americans with Disability Act specifications as required for Wheelchair Accessible Vehicles, as well as the following specifications:

- (1) The minimum ground clearance (measured from frame, loaded to gross vehicle weight rating) must be 5 inches.
- (2) (i) The passenger compartment length (measured from rear of driver's seat base to rear seat base) must be not less than 56 inches.
(ii) Exception: For an Accessible [Taxicab] Vehicle designed to carry a Passenger using a wheelchair in the front right position beside the Driver, the passenger compartment length must be not less than 38 inches.
- (3) The rear compartment of any vehicle approved for use as an Accessible Vehicle Model must meet the following dimensions as defined by the Society of Automotive Engineers:
 - (i) Effective legroom (L51) must be at least 34.6 inches.
- (4) The front compartment of any vehicle approved for use as an Accessible Vehicle Model must meet the following dimensions:
 - (i) Effective legroom (L34) must be at least 40 inches.
- (5) Total legroom (the sum of L34 and L51) must be at least 74.6 inches.
- (6) [The] Where a Wheelchair Accessible Vehicle is modified using a side entry conversion, the original floor of the Accessible Vehicle, if lowered, must be lowered from the base of the firewall to the area immediately in front of the rear axle.

(7) If a lowered floor assembly is used[, it] in the process of converting a vehicle to a Wheelchair Accessible Vehicle, the lowered floor must be stainless steel (16 gauge minimum) or the equivalent [and must meet or exceed the 1,000 hour salt spray rating].

(8) [If a lowered floor assembly is used, a vapor-insulating barrier of ½ inch marine grade plywood] Sound-deadening material must be applied over the lowered metal floor and thoroughly secured.

(9) The wheelchair ramp must not [block any part of the door or glass] obstruct the drivers' rearview sight while in the stowed position.

(10) The system provided to securely hold one or more wheelchairs in place must be the system known as Q straint QRT Standard or, if an alternative system, it must meet or exceed the Q straint QRT Standard.

(11) No anchor points may project more than 1/8 of an inch above the finished floor.

(12) If the Accessible Vehicle has a middle fold-up passenger seat, it must have a folding mechanism and base plate and must meet the requirements of the Federal Motor Vehicle Safety Standard No. 207, Code of Federal Regulations, title 49, and section 571.207.

(13) Any modifications to the rear air conditioning must be approved by the OEM.

(14) Any and all electrical wiring, other than as provided by the OEM, must be PVC-or-better insulated and color-coded for positive identification.

(15) The back-up alarm must be an electrically operated device that produces an intermittent audible signal when the Accessible Vehicle's transmission is shifted into reverse.

(16) The converted vehicle must be purchased from the same converter which has manufactured the necessary parts/components and provided the labor to convert the vehicle.

(17) Conversion of a vehicle with a salvage title certificate, as identified by a relevant State Department of Motor Vehicles, is prohibited.

(18) All approved Wheelchair Accessible Vehicles, whether modified or not, must meet all applicable federal and state emissions requirements and standards.

Section 3. Paragraph (4) of subdivision (b) of section 67-05.2 of Title 35 of the Rules of the City of New York is amended to read as follows:

- (4) *Exception regarding bumpers:* A bumper modified to allow installation of a rear-entry ramp may be approved if it satisfies either of the following:

[

- (i) *Modification by secondary manufacturer:*
 - a. The rear bumper is reinforced.
 - b. The modification is approved by the vehicle manufacturer.
 - c. The modification meets or exceeds Federal Motor Vehicle Safety Standards crash testing requirements.
 - d. Any rear door lock modifications must meet the Federal Motor Vehicle Safety Standards and the lock must be attached to the chassis, not the ramp, unless a secondary lock is attached to the chassis.
- (ii) *Modification by other than secondary manufacturer:*
 - a. The rear bumper is reinforced.
 - b. The modification is approved by the vehicle manufacturer.
 - c. The modification meets or exceeds Federal Motor Vehicle Safety Standards crash testing requirements.
 - d. The modifier must retain an engineer with at least a bachelors degree in either mechanical engineering or electrical engineering with at least 3 years' experience in automotive manufacturing to certify that each vehicle was modified using the design tested to meet or exceed Federal Motor Vehicle Safety Standards crash testing requirements.
 - e. A separate certification from such engineer for each vehicle must be presented when the vehicle is submitted for Hack-up.
 - f. Any rear door lock modifications must meet the Federal Motor Vehicle Safety Standards and the lock must be attached to the chassis, not the ramp, unless a secondary lock is attached to the chassis.

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- i. The rear bumper is reinforced.
- ii. The modification meets or exceeds Federal Motor Vehicle Safety Standards crash testing requirements.
- iii. Any rear door lock modifications must meet the Federal Motor Vehicle Safety Standards and the lock must be attached to the chassis, not the ramp, unless a secondary lock is attached to the chassis.
- iv. The modifier must retain an engineer with a bachelor's degree in mechanical engineering with at least 3 years of experience in automotive manufacturing to certify that each vehicle was modified using the design tested to meet or exceed Federal Motor Vehicle Safety Standards.
- v. Separate certification for each vehicle must be presented when the vehicle is submitted for Hack-up as a Wheelchair Accessible Vehicle.

Section 4. Subdivision (c) of section 67-05.2 of Title 35 of the Rules of the City of New York is amended to read as follows:

- (c) The Accessible Taxicab, as manufactured by the original equipment manufacturer (“OEM”) or as modified by a[n OEM] National Highway Traffic Safety Administration (“NHTSA”)-approved modifier manufacturer (or vehicle modifier), must meet all applicable Americans with Disability Act specifications as required for Wheelchair Accessible Vehicles, as well as the following specifications:
- (1) The minimum ground clearance (measured from frame, loaded to gross vehicle weight rating) must be 5 inches.
 - (2)
 - (i) The minimum passenger compartment length (measured from rear of driver’s seat base to rear seat base) must be 56 inches.
 - (ii) Exception: For an Accessible Taxicab designed to carry a Passenger using a wheelchair in the front right position beside the Driver, the minimum passenger compartment length must be 38 inches.
 - (3) The rear compartment of any vehicle approved for use as an Accessible Taxicab Model must meet the following dimensions as defined by the Society of Automotive Engineers:
 - (i) Effective legroom (L51) must be at least 34.6 inches.
 - (4) The front compartment of any vehicle approved for use as an Accessible Taxicab Model must meet the following dimensions:
 - (i) Effective legroom (L34) must be at least 40 inches.
 - (5) Total legroom (the sum of L34 and L51) must be at least 74.6 inches.
 - (6) [The] Where a Wheelchair Accessible Vehicle is modified using a side entry conversion, the original floor of the Accessible Vehicle, if lowered, must be lowered from the base of the firewall to the area immediately in front of the rear axle.
 - (7) If a lowered floor assembly is used[, it] in the process of converting a vehicle to a Wheelchair Accessible Vehicle, the lowered floor must be

stainless steel (16 gauge minimum) or the equivalent [and must meet or exceed the 1,000 hour salt spray rating].

- (8) [If a lowered floor assembly is used, a vapor-insulating barrier of ½ inch marine grade plywood] Sound-deadening material must be applied over the lowered metal floor and thoroughly secured.
- (9) The wheelchair ramp must not [block any part of the door or glass] obstruct the drivers' rearview sight while in the stowed position.
- (10) The system provided to securely hold one or more wheelchairs in place must be the system known as Q straint QRT Standard or its equal.
- (11) No anchor points may project more than 1/8 of an inch above the finished floor.
- (12) If the Accessible Taxicab has a middle fold-up passenger seat, it must have a folding mechanism and base plate and must meet the requirements of the Federal Motor Vehicle Safety Standard No. 207, Code of Federal Regulations, title 49, and section 571.207.
- (13) Any modifications to the rear air conditioning must be approved by the OEM.
- (14) Any and all electrical wiring, other than as provided by the OEM, must be PVC-or-better insulated and color-coded for positive identification.
- (15) The back-up alarm must be an electrically operated device that produces an intermittent audible signal when the Accessible Vehicle's transmission is shifted into reverse.
- (16) The converted vehicle must be obtained from the same converter which has manufactured the necessary parts/components and provided the labor to convert the vehicle.
- (17) Conversion of a vehicle with a salvage title certificate, as identified by a relevant State Department of Motor Vehicles, is prohibited.
- (18) All approved Wheelchair Accessible Vehicles, whether modified or not, must meet all applicable federal and state emissions requirements and standards.

Section 5. Subdivision (a) of section 82-50 of Title 35 of the Rules of the City of New York is amended by adding a new paragraph (i), to read as follows:

- (i) An Accessible Street Hail Livery must meet the safety and design specifications set forth in section 59C-04 of these Rules.

**NEW YORK CITY LAW DEPARTMENT
DIVISION OF LEGAL COUNSEL
100 CHURCH STREET
NEW YORK, NY 10007
212-356-4028**

**CERTIFICATION PURSUANT TO
CHARTER §1043(d)**

RULE TITLE: Amendment of Rules Relating to Conversions to Wheelchair Accessible Vehicles

REFERENCE NUMBER: 2025 RG 005

RULEMAKING AGENCY: Taxi and Limousine Commission

I certify that this office has reviewed the above-referenced proposed rule as required by section 1043(d) of the New York City Charter, and that the above-referenced proposed rule:

- (i) is drafted so as to accomplish the purpose of the authorizing provisions of law;
- (ii) is not in conflict with other applicable rules;
- (iii) to the extent practicable and appropriate, is narrowly drawn to achieve its stated purpose; and
- (iv) to the extent practicable and appropriate, contains a statement of basis and purpose that provides a clear explanation of the rule and the requirements imposed by the rule.

/s/ STEVEN GOULDEN
Senior Counsel

Date: June 27, 2025

**NEW YORK CITY MAYOR'S OFFICE OF OPERATIONS
253 BROADWAY, 10th FLOOR
NEW YORK, NY 10007
212-788-1400**

**CERTIFICATION / ANALYSIS
PURSUANT TO CHARTER SECTION 1043(d)**

RULE TITLE: Amendment of Rules Relating to Conversions to Wheelchair Accessible Vehicles

REFERENCE NUMBER: TLC-155

RULEMAKING AGENCY: Taxi and Limousine Commission

I certify that this office has analyzed the proposed rule referenced above as required by Section 1043(d) of the New York City Charter, and that the proposed rule referenced above:

- (i) Is understandable and written in plain language for the discrete regulated community or communities;
- (ii) Minimizes compliance costs for the discrete regulated community or communities consistent with achieving the stated purpose of the rule; and
- (iii) Does not provide a cure period because it does not establish a violation, modification of a violation, or modification of the penalties associated with a violation.

/s/ Francisco X. Navarro
Mayor's Office of Operations

June 30, 2025