

TAXIS FOR ALL CAMPAIGN

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New York City Taxi & Limousine Commission
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Seth Pinsky, President
New York City Economic
Development Corporation
110 William St.
New York, NY 10038

Gentlemen:

We write to comment on the "iconic taxi" Request for Information announced by the TLC on February 20. We did not see the document until it was made public.

As you may know, the Taxis for All Campaign is a coalition of groups and individuals devoted to promoting taxi and for-hire services that are fully accessible to people with disabilities in New York City. We are by far the broadest-based, longest-established and most knowledgeable group in the City on this topic.

We are pleased that the City is taking steps to promote manufacture of a new "iconic taxi," which we hope will meet the goals of being less polluting, more comfortable for passengers and drivers, and accessible to passengers with disabilities.

Unfortunately, the RFI does not declare that accessibility to people with disabilities, including those who use wheelchairs, is a bedrock requirement for a successful iconic taxi design. Rather, it suggests that all the desired attributes may not be obtainable, or obtainable in a single vehicle. On the other hand, the City has taken the position that high gas mileage is a bedrock requirement for most future yellow cabs, and it is about to do the same with respect to black cars. As the RFI recites (p. 5),

No other ... vehicle has thus far been identified to take the Crown Victoria's place as the predominant model of the New York City taxicab fleet.

Yet the City has gone ahead with mandating mileage targets that cannot be met by the Crown Victoria or any other vehicle in widespread taxi use in this country. When the City is really committed to a particular taxi feature, it demands it, in the justified expectation that the auto industry will deliver it. That is what it should do with respect to access for people with disabilities.

Despite our requests, no representative from the Taxis for All Campaign was included in the advisory committee convened to assist with preparation of the RFI. This deprived the contractor preparing the RFI of valuable input. The RFI indicates the "most important stakeholder requirements" put forward with respect to passengers with disabilities were

“different options for people with limited mobility or other conditions (service animal location, turn-out seats, improved control operation),” Vehicle Technical Specification 1.3.4.

As worthy as these priorities are, a wheelchair accessible taxi fleet is conspicuously absent from this list, as is any accommodation for people with hearing impairments. For example, there is no mention in the RFI of an induction “loop” to help people with hearing aids to understand the driver-passenger intercom or audio systems, VTS 2.10.18 & 2.10.21.

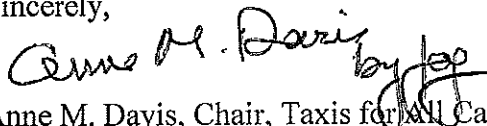
The RFI’s Vehicle Technical Specifications do not include the Americans with Disabilities Act specifications for accessible vehicles, and worse than that, contradict one of the crucial ADA specifications. The ADA specifications include dimensions for the height of the passenger door opening (56 inches), the height of the area where a passenger with a wheelchair is to sit (also 56 inches), and parameters for a safe wheelchair restraint system and ramp. Although the VTS go on for 61 pages, they do not include any of these. In fact, by specifying that the doorframe needs to be only 38 inches high, VTS 2.8.6 contradicts the corresponding ADA specification. There is no possibility that a person in a wheelchair could get through a doorframe that low.

VTS 2.8.6 permits the passenger doorsill to be 13-16 inches above the ground, far too great a step up for many people who are not totally able-bodied. There is no provision in the VTS for audio output for the meter or other technology for the benefit of people who are visually impaired, VTS 2.4.1, although the Transit Authority’s MetroCard vending machines and some ATMs now have such output.

We request once again that the Taxis for All Campaign be included in further work to develop the iconic taxi, including membership in any steering group. It is a basic tenet of the disability rights movement that there should be “nothing about us without us.” The City can be successful in moving to access only with the participation of those of its citizens who need various kinds of accommodations, and so understand them.

Thank you.

Sincerely,



Anne M. Davis, Chair, Taxis for All Campaign, on behalf of
Anti-Discrimination Policy & Action Center
Brooklyn Center for Independence of the Disabled
Center for Independence of the Disabled in New York
Disabled In Action
504 Democratic Club
National Multiple Sclerosis Society, New York City Chapter
New York Lawyers for the Public Interest, as counsel for Disabled In Action
United Spinal Association