

TRANSCRIPT OF THE
NEW YORK CITY
TAXI & LIMOUSINE COMMISSION

THURSDAY, MAY 2, 2013

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COMMISSION HEARING ROOM, 19TH FLOOR
BOROUGH OF MANHATTAN

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HEARING CONVENED AT 10:06 A.M.

COMMISSIONERS PRESENT:

Nora Constance Marino

ALSO PRESENT:

Meera Joshi, General Counsel

Staff

The Public

The Press

Reported by:

Kari L. Reed

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PROCEEDINGS

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MS. JOSHI: Good morning. We are going to start now, at 10:06, today's public meeting. Today we're holding a public meeting on proposed rules that were published in the New York City Record on April 1st, 2013. The proposed rules amend specifications for alternative fuel taxi cabs. They will increase the requirements for interior cubic volume and require rear ventilation systems that can be controlled by the rear passenger. The rules will go into effect when the Taxi of Tomorrow becomes available, and stay in effect until the Taxi of Tomorrow meets the requirements of Administrative Code Section 19-533. Based on passenger input, vehicle size and air quality are significant issues, and the purpose of the proposed rules is to address these issues in a manner that is consistent with the level of service that will be provided through the Taxi of Tomorrow.

The deadline for written comments on the proposed rules is May 6th, 2013. And the anticipated date for Commission action

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on the rules is May 16th, 2013.

Today we'll have three minutes for each speaker, and our first speaker is Placida Robinson.

(No response)

MS. JOSHI: I'm going to move to the second speaker. Jonathan Janovicf.

(No response)

MS. JOSHI: Third speaker, Mr. Mitchell Cohen.

(No response)

MS. JOSHI: Three strikes you're out, okay.

Fourth speaker, Charbel Sfeir.

(No response)

MS. JOSHI: I see the fifth speaker, Ethan Gerber.

MR. GERBER: Good morning. I note that this is very important -- is my mike on, is this on? I don't think so.

I note that this is a very important meeting, that came as a result of litigation, and not one Commissioner is present, not even the chair. The

PROCEEDINGS

1
2 Commissioners if they were here would learn
3 what the chairman already knows; that these
4 hybrid proposals are merely a ruse intended
5 to fool the court. The agency passed the
6 so-called Taxi Of Tomorrow, although in
7 violation of at least two laws, one of which
8 is Local Law 19-533, which states that there
9 must be a hybrid taxi available to all
10 current and future taxi owners. GNYTA
11 brought litigation showing this violation of
12 the law. And although the city
13 disingenuously states that the law doesn't
14 mean what it says, and that the word
15 "future" only means in the past, it now
16 rushes the cynical revision so as to attempt
17 to defeat the suit.

18 Nowhere in the voluminous material
19 handed out by the TLC on the Taxi Of
20 Tomorrow did the agency tell the
21 Commissioners about the law. Remarkable,
22 since Chairman Yassky was its principal
23 author when he was in the council. Indeed,
24 it was his greatest accomplishment, and
25 touted on his own campaign literature. Yet,

PROCEEDINGS

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the agency somehow forget to mention it.

Although the council and the mayor said the law was vital to the health of New Yorkers, these current rules are designed so that no one will be able to afford to put hybrids on the road. It is not the purpose of this agency, the majority of which is appointed by the council, and which is required by the Charter of the City of New York to report to the council, to frustrate the clear goals of the council, the elected representatives of the city. Right now there are seven different 2013 model hybrid vehicles that are approved by the TLC that can be hacked up for use as yellow taxi cabs in New York City. Under these proposed rules, none of these now approved could be approved. The two that came closest are the Lexus 400h, which would lose out on space once partitions are installed, and the Toyota Highlander, which although huge, just misses the leg room requirement depending on what size you measure. The attached specifications on our handout from the

PROCEEDINGS

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Kelley Blue Book show that. The two that

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are purported to qualify are so expensive

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that police cannot use them.

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The point of this is that by

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creating cars that after hacking up cost

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well over 40,000 each, the chairman knows

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fleets will not be able to afford it. The

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Highlander costs over 41,000, closer to

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45,000 after hack up. The Lexus before hack

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up costs over 47,000. After hacking it

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costs well over 52,000. So now because of

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the cynical conduct of this Commission, air

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will be less clean, and drivers will spend

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more in fuel.

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Just this year, Ford released the

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CMax, which gets over 47 miles per hour

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(sic). This destroys that as an option.

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These proposals are just a cynical ruse in

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response intended to cover illegal actions

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taken by the TLC that have been exposed by

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litigation. The agency must be supplying

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Commissioners with incomplete information,

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and Commissioners have simply decided that

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public input required by CAPA is pointless,

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which is why no one showed up today. That it is a formality that is to be tolerated and discarded. So when the people with knowledge and operational experience present their observations, recommendations and suggestions, they're simply ignored.

Local Law 19-533 mandates that all taxi owners have a hybrid option. There is no hybrid Taxi Of Tomorrow option. The agency knew that the taxi blatantly violated Law 19-533.

(Comm. Marino enters hearing room)

MR. GERBER: Thank you, Commissioner Marino, for showing up. You're the only Commissioner that has today.

COMM. MARINO: I see that.

MR. GERBER: Which was sponsored by the chairman. Since there's only one Commissioner, should I repeat my lines and comments?

MS. JOSHI: Do you have written testimony?

MR. GERBER: Not yet.

MS. JOSHI: Are you reading from

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written testimony?

MR. GERBER: Not yet.

MS. JOSHI: Okay. You can continue on with your testimony and then we'll provide --

MR. GERBER: Well, it's supposed to be a public hearing.

MS. JOSHI: Ms. Marino with a transcript of this hearing.

MR. GERBER: I just started, so I don't mind repeating myself.

MS. JOSHI: -- as well as a copy of the written testimony.

COMM. MARINO: Since he just started, I would prefer if he started with the beginning.

MS. JOSHI: If you could give us a summary of the beginning of the testimony, that would be appreciated.

MR. GERBER: Sure.

The Commissioners should know what the chairman already knew already, that these hybrid proposals are merely a ruse intended to fool the court. The agency

PROCEEDINGS

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2 passed the so-called Taxi Of Tomorrow,
3 although it violated at least two laws. One
4 of which was Local Law 19-533, which states
5 that there must be a hybrid taxi available
6 for all current and future taxi owners. The
7 Greater New York Taxi Association brought
8 litigation showing this violation of the
9 law. And although the city disingenuously
10 states that the law doesn't mean what it
11 says, and that the word "future" only means
12 the past, it now rushes the cynical revision
13 so as to attempt to defeat the suit.
14 Nowhere in the voluminous material handed
15 out by the TLC on Taxi Of Tomorrow did the
16 agency tell you about the law. Remarkable,
17 since Chairman Yassky was its principal
18 author when he was in the council. Indeed,
19 it was his greatest, maybe his singular
20 accomplishment. It was touted on his
21 campaign literature. Yet, the agency
22 somehow forgot to mention it in its
23 voluminous materials.

24 Although the council and the mayor
25 said the law was vital to the health of New

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Yorkers, these current rules are designed so no one will be able to afford to put hybrids on the road. It is not the purpose of this agency, the majority of which is appointed by the council, and which is required by the charter to report to the council, to frustrate the clear goals of the council, the elected representatives of the city. Right now there are seven 2013 model hybrid vehicles that are approved by the TLC that can be hacked up for use as yellow taxicabs in New York City. Under these proposed rules, none of these now approved could be approved. The two that come closest are the Lexus 400h, which would lose out on space once partitions are installed, and the Toyota Highlander, which just misses the leg room requirement, depending on what seat you measure from. According to the Kelley Blue Book, it does.

The two that are purported to qualify are so expensive that fleets cannot use them. The point of this is that by creating cars that after hacking up cost

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well over \$40,000 each, the chairman knows that fleets will not be able to afford it.

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The Highlander costs over \$41,000, closer to \$45,000 after hack up. The Lexus before

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hack up costs over 57,000 -- \$47,000. After hacking, it would cost 52,000 or more.

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So now because of the cynical

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conduct of this Commission, air will be less clean, and drivers will spend more in fuel.

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Just this year, Ford released the CMax,

12

which get 47 miles per hour. This will

13

destroy that as an option.

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COMM. MARINO: Per gallon.

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MR. GERBER: Per gallon, sorry.

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COMM. MARINO: I'm listening.

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MR. GERBER: As long as you're

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listening.

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COMM. MARINO: I'm listening.

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MR. GERBER: These proposals are

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just a cynical ruse and response intended to

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cover the illegal actions taken by this

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Commission that have been exposed by

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litigation. The agency must be supplying

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Commissioners with incomplete information,

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and Commissioners have simply decided that public input required by CAPA is a pointless formality that is to be tolerated and then discarded. Except present company excluded. So when the people with knowledge and operational experience present their observations, recommendations, and suggestions, they're ignored. Local Law 19-533 mandates that all taxi owners have a hybrid option. There is no hybrid Taxi of Tomorrow option. The agency knew that the Taxi of Tomorrow blatantly violated Local Law 19-533, which was sponsored by the chairman when he was a member of City Council, and as a council member he twice testified before this Commission in support of industry incentives that would increase voluntary use of hybrid taxis. Today, nearly half of all New York City taxicabs are hybrid.

Facing an almost certain adverse court ruling, the agency today proposes standards that are rigged so that no existing hybrid taxi can meet them, as

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though no one would bring this fact to the court's attention. And yet, here we go again; violating the spirit and letter of the law, and act outraged when the court agrees with us.

Questions?

MS. JOSHI: Thank you.

MR. GERBER: Okay.

MS. JOSHI: I just want to note for the record, Commissioner Marino joined us at 10:12. And also that the chair is absent until he can join us. He's currently with the mayor's budget briefing.

Next on the list is Erhan Tuncel.

MR. TUNCEL: Hello, Commissioner.

COMM. MARINO: Good morning.

MR. TUNCEL: Good morning. My name is Erhan Tuncel. I am the managing director of the League of Mutual Taxi Owners Association. Thank you for allowing me to testify before you today.

I am today -- just trying to put some common sense, if possible -- to support your rule change to make it possible for our

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members to have hybrid vehicles as an option

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after the TOT launch date. However, if you

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pass the proposed vehicle specs, you will

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effectively eliminate all of the hybrid

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vehicles as a choice except for two.

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I purchased a Toyota Camry hybrid,

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even though I didn't have to, because data

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collected over the last seven or eight years

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proved it to be dependable and it made

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sense. I am now helping New Yorkers breathe

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better. My vehicle gets about 38 miles to

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the gallon. That's almost three times

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better mileage than my previous vehicle.

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Right now a lot of hybrids are

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being bought by all segments of the taxi

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industry. Drivers are making more money

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because they have to spend less on gas, and

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hybrids are excellent for our environment.

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Toyota Camry hybrid is the most preferred

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choice, and the Toyota Prius V and Ford CMax

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is competing for second choice. Under the

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proposed vehicle interior specs, all three

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will be eliminated. Only Toyota Highlander

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and Lexus RX 450h will be left as a hybrid

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choice.

Let me talk about the Toyota Highlander a little. There were a lot of owner-drivers and DOVs buying the hybrid Highlander when hybrids first started their integration into the fleet. They are not buying it today. Every Highlander that's gone on the road is a non hybrid option. And that's because they proved to be a disaster. They broke down quite often, and repair costs were tremendous.

The Lexus RX 450h is a hybrid option that might also get knocked out with the partition taking away from the passenger's leg room. And even if it did not, there were less than five purchased in the last seven, eight years. That's because it costs more than \$50,000, and it's very expensive to maintain.

I am asking you to make it possible to buy a hybrid after the TOT launch date but leave the vehicle interior specs free and let the industry decide which one is a most viable choice. If you mandate

PROCEEDINGS

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the vehicle interior specs in question

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today, you are essentially eliminating

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hybrid vehicles for all unrestricted

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medallions. Trust me when I say this,

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members of LOMTO or DOVS will not buy the

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Highlander hybrid, nor will they spend 50 to

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\$55,000 for the Lexus RX.

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Today, more than half of the New

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York City taxi fleet is the hybrid, putting

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more money in drivers' pocket, and

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contributing to GreenNYC concept and making

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it easier for New Yorkers to breathe. To

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restrict hybrid choices will undermine all

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efforts to improve New York's air quality.

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To restrict hybrid vehicle choices is going

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backwards. Thank you. I have this.

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MS. JOSHI: Thank you. Do you

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have written documents, we can take them in.

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And I am going to go back to our

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list to call up some names of people who

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weren't previously here in case they're here

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now. Placida Robinson.

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MS. ROBINSON: Here.

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MS. JOSHI: Okay. Would you like

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to testify now?

MS. ROBINSON: I would.

MS. JOSHI: And if you could just state for the record if you're here on behalf of a group, name that group. Thank you.

MS. ROBINSON: No. My name is Placida Robinson, and I'm an independent medallion owner. I'm an independent medallion owner of 9 Thomas 31 medallion.

All right. I'm just having a little bit of trouble with my props today. But I'm going to try to hold them up.

COMM. MARINO: Do you need time?

MS. ROBINSON: No.

COMM. MARINO: Because maybe we could take another speaker if you need some time.

MS. ROBINSON: Okay, that would be fine.

COMM. MARINO: Why don't we do that.

MS. JOSHI: That's fine, we can move to the next name.

1 PROCEEDINGS

2 Jonathan Janovicf?

3 (No response)

4 MS. JOSHI: Mitchell Cohen?

5 (No response)

6 MS. JOSHI: And Charbel Sfeir.

7 (No response)

8 COMM. MARINO: So much for that

9 idea.

10 MS. JOSHI: Okay, we'll wait for

11 you, Ms. Robinson.

12 COMM. MARINO: I tried.

13 We are going to get you some help.

14 MS. JOSHI: We'll give you a

15 helper.

16 MS. ROBINSON: Oh, thank you very

17 much.

18 COMM. MARINO: That was a good

19 idea.

20 MS. ROBINSON: Okay. Well, thank

21 you very much, Commissioners. My name,

22 again, is Placida Robinson. And I -- well,

23 I've started a new organization, the

24 Independent Medallion Owner Driver

25 Association. I'm having a little bit of

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trouble getting some of the owners to come out and speak out. But, as you can see from my chart here, I have talked to about 25 medallion owners.

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Let me just be brief because I only have three minutes. But let me just say that I have observed that -- first of all, I'm speaking out against the proposed rule to allow a hybrid vehicle option to the taxi -- to regular medallion owners as an option to the Taxi of Tomorrow. Because I have discerned that you're making available -- by the cubic feet you're only making it available ostensibly to the Toyota Highlander hybrid. And I was here one year ago today when I told you about the problems that I personally have had with the Toyota Highlander hybrid.

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By increasing the vehicle size for the hybrid specification to 133 cubic feet, I think others have testified that you're only limiting the hybrid option to the Highlander hybrid. And I have heard remarks previously about the Lexus RX 450h, but I

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think the interior dimensions of that

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vehicle do not qualify to meet 138 cubic

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feet. So I think that that's not even a

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choice at this time.

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Let me tell you that I think also

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from observation that this seems to be an

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end run around the lawsuit that barred the

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mayor from mandating hybrids to the entire

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taxi fleet. When the judge told the taxi

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fleet that -- or told the administration

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that he was preempting the mile per gallon

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rule and could not do so, the mayor came out

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with the Taxi of Tomorrow. But the Taxi of

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Tomorrow is not a great choice -- we can all

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see that -- because it's only 25 miles per

17

gallon, which is a setback from really great

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mile per gallon fuel efficiency. And it has

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other problems. It's a four cylinder

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vehicle.

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And so ostensibly what's happening

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here, and you can just see here on the flip

23

side of my chart, it has lousy miles per

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gallon, it's a small engine, it can't handle

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the passenger payload, and it's a parts

PROCEEDINGS

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monopoly. So by offering this lousy Taxi of

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Tomorrow for the regular fleet, you are

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ostensibly forcing all of the regular owners

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into hybrid vehicles. Which is just where

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the administration wanted it from the very

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beginning.

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But when you're forcing it into

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the hybrids, and limiting it to the Toyota

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Highlander, I told you last year what we are

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getting into. 9T31, which is my medallion,

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lost \$77,000 on the Toyota Highlander 2008.

13

COMM. MARINO: Can I ask you from

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what?

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MS. ROBINSON: The purchase price

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was 47,000, 30,000 in repairs and down time.

17

Then I had to jump the vehicle. And it only

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lasted three years. It's sitting in a

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parking lot somewhere, that's the end of it.

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But I'm not alone. 2D40, which

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you called his name, he's not here, he

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bought a 2009 Highlander hybrid, paid 52,000

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for it, put in an inverter. These are

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hybrid parts only. I'm not shmoozing you

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with other parts like, you know, other

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regular repair parts. He put in 30,000 with

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the inverter. The electric hybrid battery,

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that has to be repaired over and over again,

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and these parts cost six and ten thousand

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dollars apiece. He put all these parts in,

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and then had to jump the car last year.

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But I won't stop there. This

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medallion owner, 9T33, 2006 Highlander

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hybrid, he went bankrupt when he couldn't

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afford the \$12,000 inverter price. He

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couldn't borrow the money anymore to -- he

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couldn't refinance. Because that's what we

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have to do, we have to refinance our

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medallions and take our equity out to do the

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repairs. He couldn't afford it. They

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foreclosed on his medallion, and then they

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foreclosed on his home. He's crying. His

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name is Max Hilarice (phonetic).

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My other props here is my box

21

here. A fleet owner was kind enough to send

22

me a box here of all of his invoices from --

23

he's a big fleet owner. And he sent them

24

right over. These are 2006 to 2011

25

Highlanders. And they're all in the

1 PROCEEDINGS

2 thousands, 10,000, 20,000 dollars in
3 repairs. He got rid of them.

4 And last but not least, not to
5 take up anymore of your time.

6 COMM. MARINO: That's okay,
7 continue.

8 MS. ROBINSON: This is a federal
9 lawsuit, this is a lawsuit by Toyota. I
10 just got it. It was filed in 2010. It's
11 been settled two months ago now. I got a
12 card in the mail on my Highlander.

13 COMM. MARINO: That there's a
14 class action?

15 MS. ROBINSON: Class action.
16 They've grouped all the class actions
17 together. And you will find the Highlander
18 on this, all the model years, 2006 to 2010,
19 friends. And it's here.

20 COMM. MARINO: Are we aware of
21 this at all?

22 MS. JOSHI: If you could share
23 with us the caption on that lawsuit.

24 MS. ROBINSON: Sure.

25 COMM. MARINO: Let me take a look,

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let me just take a look at the index number
and stuff.

MS. ROBINSON: Here you are.

COMM. MARINO: And I'd also like
to get a picture of your chart on both
sides, please.

MS. ROBINSON: Certainly. And
these are non hybrid medallions. 3K79,
\$55,603 with the purchase price. And the
reason why I include the purchase price is
because the medallions -- the vehicle stays
with the car only three years and gets
junked. So the car gets thrown away like a
piece of candy.

MS. JOSHI: I'm sorry, just to
clarify, you said when you were referring to
nonhybrid medallions --

MS. ROBINSON: Yes.

MS. JOSHI: These are nonhybrid
medallions who chose to buy the Highlander
hybrid.

MS. ROBINSON: Yes.

MS. JOSHI: Okay. Thank you.

MS. ROBINSON: So Commissioners,

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please, you may be marketed to, be

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influenced to vote in persuasion of a lot of

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these vehicles, but you don't have to.

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Please table this idea until you can get

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together with the administration and figure

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out what is the best taxi for New York.

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Stop forcing us to throw away our

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livelihoods, our medallions, and our life

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savings, our college savings.

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And also, I beseech you, I am a

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hybrid medallion owner. So right now under

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the current rule I have to keep buying

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hybrid medallions. I'm locked into this,

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I'm shackled into this. And I don't want to

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have to buy -- my punishment now is I'll

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have to come back and buy the Highlander

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hybrid all over again.

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COMM. MARINO: What do you have

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now, what are you driving now?

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MS. ROBINSON: Well, I escaped to

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the Camry hybrid. I got a letter from

23

Mr. Wilson in the mail when I told him about

24

the Highlander hybrid and all the money I

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paid and how I had to junk it. And he said

PROCEEDINGS

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well, Ms. Robinson, I'm sorry, you'll have to buy another hybrid. And so I bought the Camry hybrid.

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COMM. MARINO: And how is that working out, the Camry?

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MS. ROBINSON: Well, it's only three months old.

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COMM. MARINO: Okay. So that makes it --

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MS. ROBINSON: But with this ruling my punishment is I'll have to come back and buy the Highlander hybrid again.

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MS. JOSHI: But you understand under the proposed rules you would not be forced to take your Camry off the road any sooner than its retirement date.

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MS. ROBINSON: No, but the punishment is is that when and if ever. Say my Camry gets into an accident tomorrow and it's totaled beyond repair. Can you imagine?

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MS. JOSHI: In that case you could buy another Camry because the proposed rules wouldn't go into effect until the Taxi of

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Tomorrow is launched.

MS. ROBINSON: Okay. So say even if my Camry gets into an accident next year?

COMM. MARINO: The point is she still has to get a car she doesn't want at the end of the day.

MS. ROBINSON: Right.

COMM. MARINO: Whether it's tomorrow or whenever the expiration date is.

MS. ROBINSON: So the next year, 2014, when my Camry gets into an accident, the gift, the blessing I'm getting is I'll have to get a Highlander hybrid all over again. That's the gift.

MS. JOSHI: Yes, in 2014 if the proposed rules are adopted you would have to get a hybrid that meets the specs.

MS. ROBINSON: Yeah, that's the gift. Well, let's call it what it is, the Highlander hybrid, the gift that keeps on giving.

Yeah, well, listen, thank you so much.

MS. JOSHI: You're welcome.

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PROCEEDINGS

COMM. MARINO: Ms. Robinson,
before you leave I do want to get a picture
of both sides of that just for my records
and for any other Commissioners.

MS. ROBINSON: Yeah.

COMM. MARINO: Just hold it up.

MS. ROBINSON: Oh, okay.

COMM. MARINO: Since you went to
the trouble to make this chart.

MS. ROBINSON: Yeah.

COMM. MARINO: That's good, hold
it right there.

MS. JOSHI: Okay. I think that's
the end of our speaker list. So with that,
at 10:33 we are going to end this public
meeting. Thank you very much.

(Time noted: 10:33 a.m.)

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C E R T I F I C A T E

STATE OF NEW YORK)
) SS:
COUNTY OF ORANGE)

I, KARI L. REED, a Registered Professional Reporter (Stenotype) and Notary Public with and for the State of New York, do hereby certify:

I reported the proceedings in the within-entitled matter and that the within transcript is a true record of such proceedings.

I further certify that I am not related, by blood or marriage, to any of the parties in this matter and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 9th day of May, 2013.

KARI L. REED, RPR

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<p style="text-align: center;">\$</p> <hr/> <p>\$12,000 [1] 24:11 \$40,000 [1] 13:2 \$41,000 [1] 13:4 \$45,000 [1] 13:5 \$47,000 [1] 13:6 \$50,000 [1] 17:19 \$55,000 [1] 18:8 \$55,603 [1] 26:10 \$77,000 [1] 23:12</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>10,000 [1] 25:2 10:06 [1] 4:3 10:12 [1] 15:12 10:33 [2] 30:16,18 133 [1] 21:21 138 [1] 22:3 15 [1] 3:4 16th [1] 5:2 19 [1] 3:5 19-533 [7] 4:16 6:8 9:8,12 11:4 14:10,14 1st [1] 4:7</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>20,000 [1] 25:2 2006 [3] 24:9,24 25:18 2008 [1] 23:12 2009 [1] 23:22 2010 [2] 25:10,18 2011 [1] 24:24 2013 [5] 4:7,24 5:2 7:14 12:10 2014 [2] 29:12,16 25 [2] 21:4 22:16 2d40 [1] 23:20</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>30,000 [2] 23:16 24:2 31 [1] 19:11 38 [1] 16:12 3k79 [1] 26:9</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>40,000 [1] 8:7 400h [2] 7:20 12:16</p>	<p>41,000 [1] 8:9 45,000 [1] 8:10 450h [3] 16:25 17:13 21:25 47 [2] 8:17 13:12 47,000 [2] 8:11 23:16</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5 [1] 3:3 50 [1] 18:7 52,000 [3] 8:12 13:7 23:22 57,000 [1] 13:6</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>6th [1] 4:24</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>9 [1] 19:11 9t31 [2] 3:5 23:11 9t33 [1] 24:9</p> <hr/> <p style="text-align: center;">A</p> <hr/> <p>a.m [1] 30:18 able [4] 7:6 8:8 12:3 13:3 absent [1] 15:13 accident [3] 28:20 29:4,12 accomplishment [2] 6:24 11:20 according [1] 12:20 act [1] 15:5 action [3] 4:25 25:14,15 actions [3] 8:20 13:22 25:16 address [1] 4:19 administration [3] 22:11 23:6 27:6 administrative [1] 4:16 adopted [1] 29:17 adverse [1] 14:22 afford [6] 7:6 8:8 12:3 13:3 24:11,16 agency [13] 6:5,20 7:2,8 8:22 9:11 10:25 11:16,21 12:5 13:24 14:12,23 ago [2] 21:17 25:11 agrees [1] 15:6 air [4] 4:18 8:13 13:9 18:15 allow [1] 21:10 allowing [1] 15:21 almost [2] 14:22 16:13 alone [1] 23:20</p>	<p>already [3] 6:3 10:23,23 alternative [1] 4:8 although [7] 6:6,12 7:3,22 11:3,9,24 amend [1] 4:7 another [3] 19:18 28:3,24 anticipated [1] 4:25 apiece [1] 24:6 appointed [2] 7:9 12:5 appreciated [1] 10:20 approved [6] 7:15,18,19 12:11,14,15 april [1] 4:7 around [1] 22:8 association [3] 11:7 15:21 20:25 attached [1] 7:24 attempt [2] 6:16 11:13 attention [1] 15:3 author [2] 6:23 11:18 available [5] 4:14 6:9 11:5 21:14,15 aware [1] 25:20 away [3] 17:15 26:14 27:8</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>back [3] 18:20 27:17 28:13 backwards [1] 18:17 bankrupt [1] 24:10 barred [1] 22:8 based [1] 4:17 battery [1] 24:3 becomes [1] 4:14 beginning [3] 10:17,19 23:7 behalf [1] 19:6 beseech [1] 27:11 best [1] 27:7 better [2] 16:12,14 beyond [1] 28:21 big [1] 24:23 bit [2] 19:13 20:25 blatantly [2] 9:11 14:13 blissing [1] 29:13 blue [2] 8:2 12:20 book [2] 8:2 12:21 borrow [1] 24:12 both [2] 26:6 30:4</p>
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