Good afternoon,

My name is Montana Williams and I am the Director of State and Local Public Policy for the Chamber of Progress, a new center-left tech industry coalition promoting technology’s progressive future.

Our corporate partners include peer-to-peer car sharing companies like Getaround and Turo, but our partners have no voting or veto power over our positions.

We’re encouraged by the city’s support for a permanent car sharing program, but we ask the city to amend these rules to allow peer to peer car sharing services to utilize the city’s designated car share street parking spaces. This will promote competition, reduce the cost of car sharing, have a positive impact on the environment, and follow similar recent policy changes in cities like Boston.

First, amending these rules will make sure New Yorkers aren’t subject to a car sharing monopoly. By granting fleet-based company Zipcar exclusive access to designated sharing spots, these proposed rules will give them exclusive access to prime on-street parking locations throughout the city. Since proximity to a vehicle is a major driver of a customer’s decision, it will allow Zipcar to dominate the market. By denying peer to peer services guaranteed street parking, the city will be nudging consumers away from peer to peer alternatives and effectively raising their cost to park.

Second, greater competition will increase price competition and make car sharing more economically accessible. Unlike Zipcar, peer to peer car sharing companies don't have an annual membership fee. Many have raised concerns about the high price of Zipcar’s rates. Allowing peer to peer companies to have the same parking spot access as Zipcar will create greater price competition between the two -- driving down prices for New Yorkers.

Third, encouraging peer to peer car sharing will also have a positive impact on the environment. Studies show cars sit idle about 90% of the time nationwide, and with New York’s 40% increase in
car ownership during the pandemic, there will be more cars taking up prime parking real estate. Peer to peer car sharing will put existing private vehicles to more efficient use by repurposing underutilized cars, and cutting down on car production, the need for personal car ownership, garages, and storage. These companies also let users hand select the cars they’d like to use, increasing the chances of using electric vehicles which helps cut down on carbon emissions in the city.

Finally, allowing peer to peer services to utilize city car share parking spots has become the new standard in major cities. Boston alone has saved residents money, time, and stress by opening restricted spaces such as “street cleaning” areas to both fleet-based and peer to peer vehicles in order to free up scarce parking resources. The program was so successful, the city increased their number of parking spaces up to 250, while maintaining its partnership with both Zipcar and peer to peer competitors.

We encourage DOT to improve these rules by modifying the definition of a car share vehicle to include an availability-based requirement as adopted by Boston and other major cities across the US. This simple amendment would enable peer to peer car share operators to participate without affecting the integrity of the permanent car share program.

New York City has always been a place of creativity and innovation, but these rules would stifle progress by going against precedent, creating a fleet-based car share monopoly, and continuing to encourage congestion in the city. We encourage the city to amend these rules to make a stronger car share program for New Yorkers.

Thank you.