

NEW YORK CITY DEPARTMENT OF CONSUMER AND WORKER PROTECTION

COMMENTS ON PROPOSED RULE IMPLEMENTING AMENDMENTS TO EXISTING  
SIGHTSEEING BUS RULES  
JUNE 22, 2022

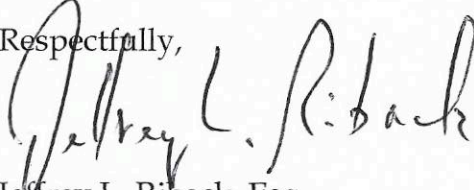
As a licensed New York City sightseeing guide and member of the Guides Association of New York City, I strongly support the Department's effort to update and modernize its sightseeing bus rules. Post-COVID, updating and modernizing the rules governing the operation and safety of sightseeing buses in the City of New York will significantly benefit the tourist experience and enhance tourist confidence in the use of this sightseeing option, and, by doing so, further promote the recovery of a vital facet of the City's economic engine.

But the Department's proposed amendments do not go far enough, because they fail to recognize critical changes in the present operation of these sightseeing buses during COVID – particularly, the decision by bus company owners to operate double-decker buses now, and going forward, with only a driver, and without the benefit of an guide/monitor presence on the upper deck of these buses.

Because of this change in operation, drivers, today, are greatly susceptible to distracted driving during vehicle operation, forced to deal with passenger questions and potentially injurious passenger behaviors, previously handled by a guide/monitor on the upper deck of the bus. And the City's new Open Streets initiative, in furtherance of post-COVID economic recovery, has made sightseeing bus transit on heavily trafficked and narrowed streets even more difficult than before the pandemic.

Consequently, consistent with the its emphasis on driving safety in the proposed rules, the Department must also develop further regulations that limit the potential for driver distraction and serve to focus driver responsibility solely on safe driving. Before COVID, trained guides had been a presence on sightseeing buses going back to 1896. Requiring the return of guide/monitors on double-decker buses would remove the potential for driver distractions, greatly enhance bus, pedestrian, and traffic safety, and improve the passenger experience. Pending legislation before the City Council (Int. No. 289-A (2018)), would mandate this return, but the Department's administrative mandate to assure the safe operation of sightseeing buses also allows for the promulgation now of regulations directed to that same end.

These comments are being sent to both the Department's website and via email to the designated address.

Respectfully,  
  
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