

As a former double decker sightseeing bus tour guide I welcome all the proposed changes for Local Law 176 in regards to safety and consumer protection. In addition I thank you for soliciting comments on these changes. Drawing on my personal experience in the industry I offer the following feedback.

The proposed change for the number of hours worked by bus operators is long overdue and a significant step forward in terms of safety. To further improve safety conditions for bus operators and passengers, however, it would also be prudent to restrict the type of tasks bus operators can be required to perform while also driving double-decker buses.

In addition to driving sightseeing buses filled with large numbers of passengers, bus operators are also currently being tasked with manually operating the pre-recorded audio commentary for entertainment purposes. All this in addition to being responsible for monitoring passengers on both the upper and lower decks using video monitors. Imagine being in an Uber and seeing your driver playing a game of Tetris and watching a baseball game at the same time? This is essentially what is happening in almost every single sightseeing bus on the street today.

The ideal solution would be to require another employee on top of the bus as was the practice when these companies employed live guides. The removal of live guides has greatly diminished the safety of these buses and has resulted in the overworking of the drivers. Already one passenger has been severely injured due to a distracted driver pulling out before she was seated. As a result she was propelled down the bus stairs, suffered multiple blackouts, and currently is dealing with severe mobility issues months after the incident. She believes (as do I) that had a guide been on the top of the bus communicating to the driver when passengers were seated her accident could have been avoided.

Regardless of the number of the employees on the bus it is my opinion that it should be made clear that drivers operating the bus should have their focus solely on safely maneuvering their vehicle. If operating a cellphone or other portable electronic devices is illegal for commercial drivers EVEN at red lights why are they being allowed to operate the manually controlled audio commentary while in traffic?

To this end I would ask that you specifically ban this practice in NYC and if possible also ban the installation of any device that controls audio commentary within reach of the bus operator.

Respectfully,

James Hoffman