



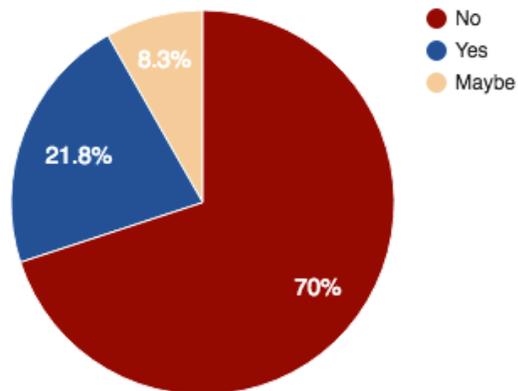
Commissioner Meera Joshi, TLC, 33 Beaver Street, New York, NY 10004

RE: Fatigued Driving Opposition Letter

Honorable Commissioner Joshi,

On behalf of the Independent Drivers Guild's 35,000 drivers, we stand in opposition to the Taxi and Limousine Commission's proposed rules intended to curb fatigued driving. Since June 21st we have been surveying our members and soliciting their position on the proposed rules. We presented arguments for and against the rule, as well as explained the law to the best of our ability. Their feedback is extremely clear: if the TLC would like to reduce fatigued driving, we first need your help to ensure workers are paid a fair and equitable wage. Seventy percent of our members oppose the rule.

**Do you support the TLC's proposed rules?**



Capping these worker's potential take-home pay, without increasing their rate of pay per trip or per minute, will only force drivers to find ways to skirt the laws or provide less for their families.

The Commission has argued that only "three percent of drivers for hire [sic] in New York City typically drive more than 12 hours per day and less than seven percent typically drive more than 72 hours in a week." But it seems to us that these statistics are misleading. Unfortunately for our members, weeks when you're short on rent, food or other expenses are far too common. Although it may be that within a given week only three percent of drivers would violate the 12 hour or 72 hour benchmark, I would be interested in seeing how many working people this would affect, not in a week or a day but in a year.

We do commend the Taxi and Limousine Commission for taking steps forward to achieve the goals of Vision Zero and reduce all traffic injuries and fatalities. The Independent Drivers Guild upholds the traditional labor motto "An injury to one is an injury to all." But we believe to achieve that goal, we must ensure workers have a say in their working conditions. We will continue to fight to ensure that the people moving New York City can provide for their families without having the need to work dangerously long shifts, and time away from the ones they love. In the meantime, please, do not stop these drivers from being able to make ends meet. Before the commission proposes a cap to the small



amount of money our members can take home, please help us raise the floor to a reasonable standard.

We oppose the Taxi and Limousine Commission's proposed rules intended to curb fatigued driving, and call on the commission to work to make driving a livable profession before we curtail the ability of our drivers to provide for their families.

Respectfully,

Ryan Price  
Executive Director  
Independent Drivers Guild