



CITY OF NEW YORK

**MANHATTAN COMMUNITY BOARD FOUR**

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**DELORES RUBIN**  
Chair

**Jesse R. Bodine**  
District Manager

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Ms. Margaret Forgione  
Manhattan Borough Commissioner  
New York City Department of Transportation  
59 Maiden Lane, 37<sup>th</sup> Floor  
New York, NY 10038

**RE: Bus stop permits for Sightseeing buses – Rule 2015 RG 073**

Manhattan Community Board 4 (MCB4) appreciates being consulted to comment on the proposed new rule to allocate 45 sightseeing bus stops that became available as a result of an anti trust settlement. MCB4 generally supports the rule - subject to the recommendations below.

The companies seeking to acquire the stops would be allocated a rank number by lottery. Based on that ranking, each company would then have the opportunity to select a stop. No company can select a stop within a radius of three “blocks” from one of their existing stops.

We recommend the following amendments to the rule:

- Stops that are currently combined with MTA bus stops must not be allocated: this is too disruptive to MTA commuters. One example is at the southeast corner of 42<sup>nd</sup> Street and 9<sup>th</sup> Avenue (on 42<sup>nd</sup>).
- Sidewalk width and other land use (school, residences, sidewalk cafes etc.) should be taken in consideration before allocating stops.
- All Operators are not equal: the number of customers loading – unloading per day at a given stop should also be taken in account especially where sidewalks are narrow.
- “Block” should be expressed in feet to avoid confusion.
- US Department of Transportation – Federal Motor Carrier Safety Administration record of the companies should be taken into consideration to grant new stops and companies with very poor records should be ranked lowest. This would ensure that only safe drivers and vehicles are allowed an intense use of New York Streets.

Sincerely,

Delores Rubin  
Chair