



Testimony

of

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before the

Taxi and Limousine Commission

On the

Proposed Regulations to Reduce the Risks of Fatigued Driving by TLC Licensed Drivers

**June 23, 2016
33 Beaver Street, 19th Floor
New York City**

Good morning, Chair Joshi and Members of the Commission. My name is Anna Caffarelli, and I am Special Projects Coordinator for the Injury and Violence Prevention Program at the New York City Department of Health and Mental Hygiene. Thank you for the opportunity to speak in support of the efforts of the Taxi and Limousine Commission to protect the health and well-being of New Yorkers.

Traffic crashes caused approximately 340 deaths each year in New York City between 2000 and 2013.¹ Each year there are more than 2,000 hospitalizations for pedestrian injuries alone.² Traffic safety has long been a priority public health issue and there have been significant advances made in prevention by improving occupant protection, curbing impaired driving, and improving the safety standards for vehicles and roadway design. Together, these improvements and others have saved hundreds of thousands of lives.³ In that tradition, the Health Department is proud to be an active partner and participant in Mayor de Blasio's Vision Zero initiative.

Motor vehicle crashes are the leading cause of work-related deaths in the United States. They account for approximately 30 percent of all work-related fatalities.⁴ There is strong evidence that sleep deprivation and long driving shifts result in decreased driving performance, both for professional and non-professional drivers, and increased risk of motor vehicle crashes and injuries. Studies have shown that the risk factors for crashes increase as uninterrupted driving time increases.^{5 6} Sleep deprivation causes slower reaction times, lessens the ability to maintain attention and increases error rates.⁷ Lack of sleep has been shown to cause the same

¹ Fung, L. Traffic Fatalities in New York City, New York City Department of Health and Mental Hygiene Epi Data Brief, No. 59, October 2015.

² New York Statewide Planning and Research Cooperative System.

³ National Highway Traffic Safety Administration, National Center for Statistics and Analysis; Lives Saved estimates accessible at <http://www-nrd.nhtsa.dot.gov/Pubs/811160.pdf> and <http://www.nhtsa.gov/cars/rules/regrev/evaluate/809833.html>

⁴ United States Department of Labor. Safety and Health Topics: Motor Vehicle Safety. Accessed June 20, 2016: <https://www.osha.gov/SLTC/motorvehiclesafety/>

⁵ Sagaspe, P., Taillard, J., Akerstedt, T., Bayon, V., Espie, S., Chaumet, G., Bioulac, B., Philip, P. (2008). Extended Driving Impairs Nocturnal Driving Performances. *PLoS ONE* <http://dx.doi.org/10.1371/journal.pone.0003493>

⁶ Howard, M.E., Desai, A.V., Grunstein, R.R., Hukins, C., Armstrong, J.G., Joffe, D., Swann, P., Campbell, D.A., and Pierce, R.J. (2004). Sleepiness, Sleep-disordered Breathing, and Accident Risk Factors in Commercial Vehicle Drivers. *Am J Resp Crit Care Med* 170(9): 1014 – 1021.

⁷ American Academy of Sleep Medicine Board of Directors (2015). Confronting Drowsy Driving: The American Academy of Sleep Medicine Perspective. *J Clin Sleep Med* 11(11): 35 – 36.

degree of impairment as having a blood alcohol level of 0.05 percent.⁸ Moreover, chronic sleep deprivation from atypical work schedules can lead to circadian rhythm disruptions which increase the risk for injuries; not to mention obesity, chronic diseases and cancer.^{9 10 11} In 2015, the American Academy of Sleep Medicine issued its formal position that drowsiness compromises driving ability by reducing alertness, delaying reaction times, and hindering decision-making skills.¹²

The Taxi and Limousine Commission's proposal to limit total driving hours to no more than 72 per week, and 12 hours each day, directly addresses these risks and would likely prevent for-hire drivers from being excessively impaired by overwork and lack of sleep.

This proposal not only advances Vision Zero's goal of reducing traffic deaths and injuries, it protects the health of New York City motorists, pedestrians, visitors and professional drivers themselves by limiting the presence of impaired for-hire drivers on the road.

Thank you.

⁸ Falleti, M.G., Maruff, P., Collie, A., Darby, D.G., McStephen, M. (2003). Qualitative Similarities in Cognitive Impairment Associated with 24 Hours of Sustained Wakefulness and a Blood Alcohol Concentration of 0.05 percent. *J Sleep Res* 12(4): 265 – 274.

⁹ West, A.C., Bechtold, D.A. (2015). The Cost of Circadian Rhythm Desynchrony: Evidence, Insights, and Open Questions. *Bioessays* 37(7): 777 – 788.

¹⁰ Boivin, D.B., Boudreau, P. (2014). Impacts of Shift Work on Sleep and Circadian Rhythms. *Pathol Biol (Paris)* 62(5): 292 – 301.

¹¹ Caruso, C.C. (2014). Negative Impacts of Shiftwork and Long Work Hours. *Rehabil Nurs* 39(1): 16 – 25.

¹² American Academy of Sleep Medicine Board of Directors (2015). Confronting Drowsy Driving: The American Academy of Sleep Medicine Perspective. *J Clin Sleep Med* 11(11): 35 – 36.