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

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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. Each year there are more than 2,000 hospitalizations for pedestrian injuries alone. 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. 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. 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. Sleep deprivation causes slower reaction times, lessens the ability to maintain attention and increases error rates. Lack of sleep has been shown to cause the same

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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.
degree of impairment as having a blood alcohol level of 0.05 percent.\textsuperscript{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.\textsuperscript{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.\textsuperscript{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.