



# Hollywood Tour-Bus Task Force



## Consumer Protection & Enforcement Division

Shon Taylor and John Roldan

September 15, 2016





**Transportation Enforcement Branch- LA (TEB- LA) responds to complaints from local Hollywood businesses and residents concerning:**

- **Licensed and unlicensed tour bus companies**
- **Overly aggressive tour bus companies soliciting customers on sidewalks**
- **Unsafe tour buses driving along narrow residential streets**

## **Step 1- Agency Strategy Meetings**

TEB-LA attended a series of meetings with other law enforcement agencies. To identify problems in the Hollywood area and coordinate future task force/ joint-operations.





## Step 2 – Field Observations

- Area Surveillance
- Undercover observations
- Collaboration with Hollywood PD





## Step 3 - The CPUC Facilitated Training Classes

1. CPUC Database Agency Access
2. Public Utilities Code regulations review
3. Misdemeanor citation report writing
4. Vehicle impounds/hearings





40 law-enforcement attendees from the Los Angeles City Attorney's Office, Beverly Hills PD, Culver City PD, Santa Monica PD and Santa Barbara PD, with more training sessions to follow in the near future.





## Step 4 - Joint Task Force Goals

1. **Public Safety**...Assure compliance with CPUC regulations, verify that four buses operating in the Hollywood-area are properly licensed and all vehicles operating are on file
2. **Train local law enforcement agencies** to understand Public Utilities Code regulations
3. **Work in conjunction with other agencies**, ex. LA City Attorney's Office, CHP, Hollywood PD, and LAX PD
4. **To implement an appropriate and timely enforcement** against illegal carriers, including sting operations and other forms of presence in the field





## Step 5 - Joint Operations

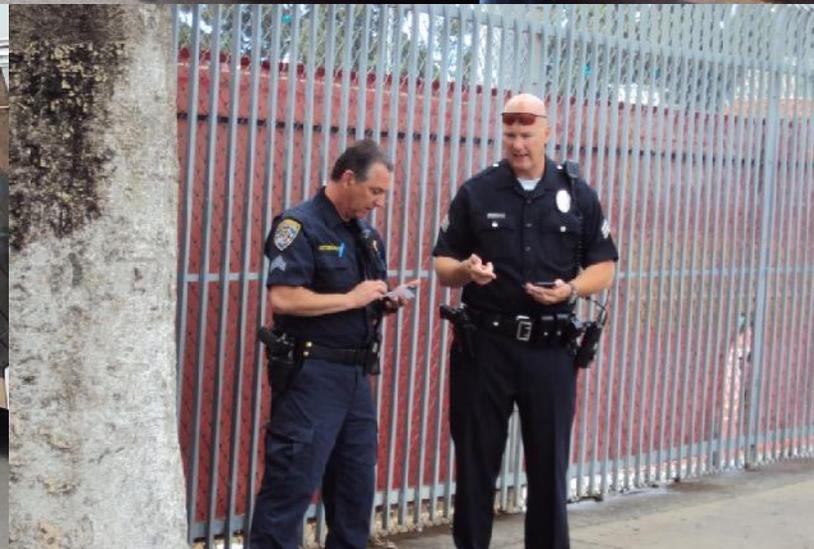
TEB-LA investigators are currently working with the Los Angeles City Attorney's Office, LAPD Hollywood Division, Beverly Hills PD & Traffic Officers, Culver City PD, Santa Monica PD, and California Highway Patrol (CHP)





## Hollywood Inspection July 2016

- Total 67 vehicles inspected/ observed
- 3 illegal carriers
- 1 suspended (CDL)
- 4 buses impounded





## Hollywood Blvd.



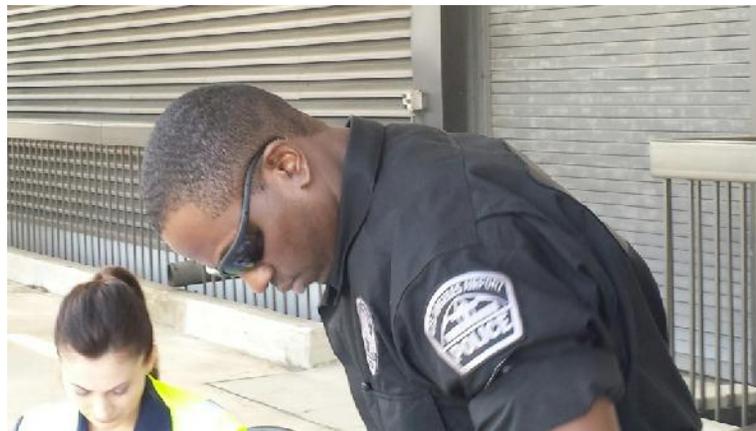
## Hollywood Inspection August 2016

- 36 Inspections
- 10 Observation Reports
- No Impounds
- 8 mechanical citations





# Joint Inspections





# Continuing Joint PUC and Law Enforcement Activities







# New Federal Requirements



U.S. Department of Transportation  
**National Highway Traffic Safety Administration**

1200 New Jersey Avenue SE.  
Washington, DC 20590

August 19, 2016

BY CERTIFIED MAIL



The National Highway Traffic Safety Administration (NHTSA) is an agency within the U.S. Department of Transportation (DOT) that is responsible for improving safety on our nation's highways. To achieve this goal, NHTSA develops and enforces Federal motor vehicle safety standards (FMVSS), which require minimum levels of safety performance for motor vehicles and for certain items of motor vehicle equipment. We are also authorized to order manufacturers to recall and repair motor vehicles or motor vehicle equipment when our investigations indicate that they contain safety defects in their design, construction, or performance or do not comply with a FMVSS. We also monitor the adequacy of manufacturers' recall campaigns.

Recently, NHTSA has become aware that your company is operating passenger vans that have had the roof removed so the vehicle can be used to provide "open top" tours. We are concerned that you are putting the safety of your passengers and employees at risk and urge you to discontinue use of these vehicles. We are aware that some of these "open top" tour vans have had the vehicle's seat belts removed or modified from their original design. Moreover, removing the vehicle's roof could affect the safety of the vehicle by reducing the level of protection provided to vehicle occupants in the event of a rollover crash. We are also concerned that the modifications to the seat belts necessary to remove the roof could affect the integrity of the seat belt assembly and anchorages which could reduce the effectiveness of the seat belts. Furthermore, removing the seat belts from any vehicle has serious safety consequences. You should never transport passengers in any vehicle from which the seat belts have been removed.

Federal law prohibits any manufacturer, distributor, dealer, or motor vehicle repair business from knowingly making inoperative any federally required safety device. 49 U.S.C. § 30122. FMVSS No. 208, *Occupant Crash Protection*, requires passenger vans<sup>1</sup> with a gross vehicle weight rating (GVWR) of 10,000 pounds or less to have a three-point lap and shoulder belt (also known as a Type 2 belt) at every designated seating position. 49 C.F.R. § 571.208, S4.4.5. Type 2 belts

<sup>1</sup> NHTSA considers a motor vehicle designed to carry ten or more passengers to be a bus. 49 C.F.R. § 571.3.

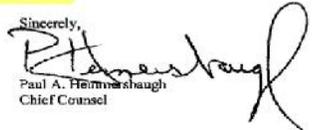


must comply with the requirements of FMVSS No. 209, *Seat Belt Assemblies*. 49 C.F.R. § 571.209. Furthermore, all seating positions with a Type 2 belt must be equipped with a seat belt anchorage meeting the requirements of FMVSS No. 210, *Seat Belt Assembly Anchorages*. 49 C.F.R. § 571.210. Removing the vehicle's seat belts or replacing a Type 2 belt with a two-point lap belt (also known as a Type-1 belt) would violate the "make inoperative" prohibition. The modifications to seat belts necessary to remove the vehicle's roof could affect the seat belts' compliance with FMVSS No. 209 and FMVSS No. 210. This could also constitute a violation of the make inoperative prohibition if the vehicle no longer complied with these standards after the roof was removed.

In order to determine if any federal laws or regulations has been violated, we are requesting that you provide the information in the attached Special Order. You are required to respond in full to the requests in the Special Order by September 19, 2016.

If you do not timely or completely respond to the Requests in this letter, you may be subject to civil penalties of up to \$21,000 per day.

If you have any questions, please contact Thomas Healy of my staff at (202) 366-7161 or thomas.healy@dot.gov.

Sincerely,  
  
Paul A. Hammerbaugh  
Chief Counsel





# Results

- Law enforcement more familiar with PUC and its rules and regulations
- Increased enforcement of PUC rules and regulations
- Decrease in the number of unlicensed carriers
- Law enforcement agencies in neighboring cities are now wanting to be trained on enforcing PUC rules and regulations
- Successful prosecutions in the courts
- Local City Attorney's are more willing to prosecute PUC regulations in court
- Federal Agency has taken notice of potential public safety issues
- More interest in working collaboratively on joint operations
- Positive media attention and positive feedback





# Commendations





John and Adrienne,

Thank you so much for all your help and coordination regarding the Hollywood tour bus issue. We are very grateful to your partnership and assistance.

As discussed just now, when you get a chance please let us know the names of the tour operators whose C&D letters were returned.

Thanks again!

Sincerely,

<http://s.wisestamp.com/links?url=http%3A%2F%2Fwww.cd13.com&sn=d2lsglhbS5heWFsYUBsYWNpdHkub3Jn>

Dan Halden  
Hollywood Field Deputy

**Office of Councilmember Mitch O'Farrell**  
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(323) 957-4500 | [www.cd13.com](http://www.cd13.com)

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<http://s.wisestamp.com/links?url=http%3A%2F%2Fwww.instagram.com%2Fmitchofarrell&sn=d2lsglhbS5heWFsYUBsYWNpdHkub3Jn>> YouTube <http://www.youtube.com/>

Dear Adrienne,

Please extend my appreciation to the PUC staff for their professionalism, excellent ongoing training, partnership, and availability to answer my and LAPD's many questions. I hope this is the beginning of regular commercial vehicle enforcement in Hollywood.

I will be in touch soon.

Thanks again for everything you do!!!

Sincerely,

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**Jackie Lawson - Deputy City Attorney**  
**Neighborhood Prosecutor - Hollywood**  
**Safe Neighborhoods & Gangs Division**

Office of the Los Angeles City Attorney  
200 N. Main Street, 5th Floor  
213.978.7878 - Main Number  
Mail Stop 140





## TEB's Efforts Captured by Local Media

<http://www.nbclosangeles.com/investigations/Hollywood-Tours-Residents-389777331.html>

<http://www.nbclosangeles.com/investigations/Hollywood-Tour-Trouble-Part-2-Safety-390109241.html>

<http://www.nbclosangeles.com/news/local/Hollywood-Tour-Trouble-topless-safety-390868241.html>

**KNBC 4  
Consumer  
Investigative  
Reports**

