

COMMENTS FOR WORKSHOP ON SPECIAL EVENTS / DRIVER PERMITS

Docket No. 23-07009

August 1, 2023

1. NAC 706.1191– “Special event” defined.
 - a. Will this differ from current authority of Special Services?
 - b. Will this need its own authority approval for companies to utilize?
 - c. Will this be available to all certificated charter bus and charter limousine carriers?
 - i. Limited to areas of state/county operation under CPCN?
2. Special Event defined
 - a. Will there be a list of events?
 - i. If so, can a company file to request an event be added to the list?
 - ii. If not, how will a company know if the event qualifies or not?
 - b. “Occurring quarterly or annually”
 - i. So does not apply to weekly Raider games, singular concerts, etc.?
 - ii. Super Bowl is not annual, maybe every 5 years
3. Additional vehicles temporarily added to certificated carrier’s fleet
 - a. So if a company is authorized for 5 charter limousines, they can now exceed that amount for a “Special Event”?
 - i. How many vehicles can be added?
 - ii. Is there a process, standard, or proof that has to be met to add vehicles?
 - (1) how long take and what is required?
4. Not mentioned
 - a. Tariff
 - i. Can carriers add a new charge for a special event?
 - (1) must this be done prior to the event?
 - b. If a company does not need to exceed its current authorized vehicle limit, but they rent vehicles within their certified number, can they hire drivers pursuant to this “Special Events” designation, or would they just follow as regularly would? Same for inspection of vehicles and driver records
5. NAC 706.13779.1 Special Event Driver Permit
 - a.
 1. Any person intending to drive a charter bus for the purpose of passenger transportation, a motor vehicle for a fully regulated carrier of passengers or a taxicab motor carrier as an employee, independent contractor or lessee, **for a Special Event, as defined in NAC 706.1191**, shall obtain a special event driver permit from the Authority.
 - b. Can a driver be an independent contractor? I thought they had to be employees?
6. Authority may issue a special event driver permit
 - a. Does it apply only for vehicles and drivers beyond their certificated number, or can

- it apply to all the vehicles they run during the event?
 - b. How does a company inform the NTA which are the additional vehicles from their regular vehicles they would be normally running under their authority?
- 7. “Conducts or contracts with an established third-party provider “
 - a. Just “established”? Or licensed, or approved, or how define “established”?
- 8. I presume this would not apply to regular drivers of the carrier, who have a driver file with the carrier?
- 9. Criminal must be updated at least once every 3 years; how about their driving record? Same once every 3 years, or every year?
- 10. “3. The special event driver permit must be in the driver’s possession during the entirety of the provision of passenger transportation **during the Special Event.**”
- 11. “5. The special event driver permit is invalid”
 - a. Invalid, meaning no longer any good? Or “temporarily suspended during non-Special Event periods”?
 - b. If Driver 1 is employed by Omni, but drives for T1 during CES, and then moves from Omni to AWG, but wants to drive for T1 during the next year’s CES, must they update their Special Events Driver Permit, or is it still good since still with T1? Or does this apply only when switching certificated carriers under the Special Events Driver Permit?
- 12. NAC 706.381(1)
 - a. Do the allowances of inspection by a mechanic or third party mean the NTA can send these other persons/entities to a carriers’ property to perform these inspections?
 - b. Does this now allow the NTA to require a company to obtain a inspection by a certified mechanic or third-party company and send to the NTA, in lieu of the NTA coming out to inspect the vehicles?
 - i. I am not sure why this is provided for under inspection of vehicles by NTA, versus maybe 706.203 where it references annual inspections of vehicles and submissions of reports? Failure to submit a proper report or timely report has resulted in citations under NAC 706.203, not 706.381