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September 10, 2014

Samuel D. Zimbabwe
Associate Director
District Department of Transportation
55 M Street SE
Washington, DC 20003

VIA E-MAIL: sam.zimbabwe@dc.gov

RE: ANC 6B Comments on Proposed Rule on Visitor Parking Pass Program

Dear Mr. Zimbabwe:

At a properly noticed meeting with a quorum present, Advisory Neighborhood Commission (ANC) 6B voted 9-0 to send these comments to the District Department of Transportation (DDOT) on its proposed rule on the Visitor Parking Pass (VPP) Program.

In general, ANC 6B supports the proposed rulemaking released on August 22, 2014. However, we urge DDOT to change §2413.12(a) to read:

> Each annual visitor parking pass shall authorize a person using the pass to park a vehicle only in the Advisory Neighborhood Commission *Single Member District* area designated on the pass.

This would also necessitate a similar change in §2413.12(b). Our suggested change is shown in *italics*.

ANC 6B feels that it would help reduce fraudulent use of the VPPs, especially by suburban commuters, if the permitted area of use is smaller than the size of our ANC. These passes are meant to be used by visitors and workers of the resident to whom the pass is issued and there does not seem to be a reason why such vehicles should park blocks away from this address.

We also urge DDOT to work with Parking Enforcement in the Department of Public Works (DPW) to find ways to reduce fraudulent use. For instance, we understand that even when a VPP is reported stolen, DPW does not yet have a method to check the validity of VPPs displayed in parked vehicles. Other anecdotal examples of fraud include the: a) use of VPP by workers at commercial establishments, b) use of VPP to skirt DC vehicle registration requirements, and c) sale of VPP passes to commuters from Maryland and Virginia.

Sincerely,

Brian Flahaven
Chair