

E-BOOKNOW

Driver App & TLC FHV Dispatch Compliance Support Memorandum

REVISED — Driver App operation while vehicle is in motion

Purpose. Explain how a TLC-licensed New York City FHV base may use E-BookNow as contracted dispatch software while the licensed base remains the regulated dispatching entity.

Regulatory position. E-BookNow is software, not a TLC-licensed FHV base. The licensed base remains responsible for dispatch, rates, driver and vehicle eligibility, records, passenger disclosures, accessibility and all other TLC obligations.

This revised version specifically clarifies that TLC rules do not impose an absolute prohibition on all interaction with a dispatch app while a vehicle is moving. Permitted limited interaction may include a single-touch pre-programmed response or voice activation, while other manual interaction must occur when the vehicle is lawfully stopped.

1. Core TLC Compliance Controls

- Verified base identity: E-BookNow's TLC workflow associates the company profile and applicable reservations with a reviewed TLC FHV base claim.
- Driver and vehicle eligibility: for NYC pickups, the platform is designed to check driver and selected vehicle status against official TLC records before final assignment.
- Dispatch record: dispatching-base, affiliated-base, driver, vehicle and plate information can be captured in the assignment record.
- Trip records: trip events and TLC reporting data can be maintained for the licensed base's review and submission.
- Fatigue controls: TLC mode can support the base's monitoring of applicable passenger-time limits.

2. Corrected Driver-App Rule

Driver App Use While Vehicle Is in Motion. The E-BookNow Driver App shall be operated in accordance with applicable NYC TLC rules governing electronic dispatch devices and driver-facing interfaces. While the vehicle is in motion, the Driver may interact with a dispatch request only through functionality permitted by TLC rules, including a single-touch pre-programmed response or voice-activated functionality, where applicable. Any interaction requiring additional manual input, typing, navigation, or other non-permitted interaction must be performed only when the vehicle is lawfully stopped.

Operational interpretation. A driver may receive dispatch information while driving. The compliance issue is the manner of interaction with the electronic interface. E-BookNow should therefore restrict moving-vehicle interaction to TLC-permitted methods and require the vehicle to be lawfully stopped for typing, navigation through screens, detailed data entry, or other manual interaction not permitted while moving.

3. Suggested Technical Representation to TLC

"E-BookNow's Driver App is designed so that dispatch information may be delivered to a driver while the vehicle is operating. Driver interaction with a dispatch request while the vehicle is in motion is limited to functionality permitted by applicable TLC rules, including a single-touch pre-programmed response or voice-activated functionality where applicable. Functions requiring additional manual interaction are intended to be performed only when the vehicle is lawfully stopped."

4. Rule-to-Feature Summary

Area	Compliance support
Licensed base / pre-arrangement	Reservation and assignment remain attributable to the TLC-licensed dispatching base.
Driver / vehicle licensing	Eligibility checks support the base's obligation not to dispatch unlicensed drivers or vehicles.
Trip records	Assignment and trip-event data support TLC trip-record preparation and auditability.
Driver App while moving	Not an absolute app-use prohibition: moving interaction is limited to TLC-permitted single-touch pre-programmed response or voice activation; other manual interaction must wait until lawfully stopped.

5. Filing Position

The base should disclose E-BookNow as a contracted dispatch service where required, maintain the applicable operating/subscription agreement, and continue to assume responsibility for its own TLC compliance. The preferred wording is that E-BookNow is designed to support TLC compliance; it should not be described as “TLC-approved” unless TLC has issued written confirmation using that terminology.

References: NYC TLC Chapter 59; TLC Dispatch App Disclosure; TLC FHV Trip Record Submission; E-BookNow TLC Docs Checker; E-BookNow TLC Base Registry & Dispatch Snapshots.

Disclaimer: Technical/compliance-support document; not legal advice and not an agency approval.