

Independence National Historical Park (“INHP”) Tour Passenger Loading Zone Areas for Motorized Tour Operators at the Independence Visitor Center (“IVC”) Showing Four Staging Locations for Ride the Ducks (“RTD”)

Creating four separate companies (Ride the Ducks, River Ducks, Philly Ducks and Penn Ducks) all operated under the Ride the Ducks’ brand and all providing the same exact tour on the same exact vehicles appears to be in direct violation of the evident intent of Section 1, Title 9, Chapter 9-400 Carriers, of The Philadelphia Code, Regulation of Businesses, Trades and Professions, Bill 050862-A, as amended on January 24, 2006; particularly the requirements of the “Tour Passenger Loading Zone”.¹ Bill 050862-A, §9-407, Section 10(b) and 10(c) (page 7), provides:

(b) No tour passenger carrier shall be permitted to use more than one tour passenger loading zone per block face.

(c) No tour passenger carrier shall be permitted to use more than one tour passenger loading zone in the area bounded on the west by the west curbline of 6th street, on the north by the south curbline of Arch street, on the east by the east curbline of 5th street and on the south by the north curbline of Market street.



Tour Passenger Loading Zone Areas

A	Ride the Ducks - RTD Zone 1 (immediately North of Market Street)
B	Passenger Loading Zone
C	Ride the Ducks permitted as "Penn Ducks" - RTD Zone 2 (North of RTD Zone 1)
D	Ride the Ducks permitted as "Philly Ducks" - RTD Zone 3 (North of RTD Zone 2)
E	Big Bus Company
F	Ride the Ducks permitted as "River Ducks" - RTD Zone 4 (North of Market Street)
G	Philadelphia Trolley Works
XX	Main Entrance to Independence Visitor Center off Market Street
X	Side Entrances to Independence Visitor Center
EE1	Independence Visitor Center Emergency Exit Only onto 6th Street
EE2	Independence Visitor Center Gift Shop Emergency Exit Only onto 6th Street

According to RTD, "Duck Central is easy to find - we are in the heart of the Historic District. Ride The Ducks boards at the corner of 6th and Market Street right next to the Independence Visitor Center."
Source: Ride the Ducks Web site, <http://www.phillyducks.com/tour-boarding-locations/>

Notes: Illustration is not done to scale, but to show general positioning and quantity of Tour Passenger Loading Zone areas
Subsequently to this letter being sent (in Fall 2007), Tour Passenger Loading Zone Areas were changed slightly in that "A" was moved to occupy the spot of "B", and that "A" became a "Truck Loading Area" for some reason.

¹ Tour Passenger Loading Zone is defined as “All that area used by a tour bus or amphibious tour vehicle for the loading and unloading of passengers” (Bill 050862-A, §9-407. Section 1, Definitions, Page 2).