



**TESTIMONY OF
ANTHONY CROWELL, COUNSELOR TO THE MAYOR,
ON INTRO 643, BEFORE THE NEW YORK CITY COUNCIL
COMMITTEE ON GOVERNMENTAL OPERATIONS**

DECEMBER 6, 2007

Good morning Chairman Felder and Members of the Committee. My name is Anthony Crowell, Counselor to Mayor Bloomberg, and on behalf of the Administration, I would like to thank you for the opportunity to discuss the bill before you today, Intro. 643. The bill amends and expands City Charter Section 1043 governing certain notice provisions under the City Administrative Procedure Act ("CAPA"). As an initial matter, I would like to say that the Administration is appreciative of the opportunities it has had to work with the Council to ensure transparent, open, efficient and productive government operations. We view the issues raised by this bill as another such opportunity.

In proposing this bill, the Council seeks to expedite an administrative agency's transmittal of proposed rulemakings and emergency rulemakings to the Council and an expanded list of other interested parties to coincide, at the latest, with the transmittal of such information to the City Record for publication. Indeed, the Administration supports the goals of this bill to enhance the transparency and openness of the CAPA process through broader outreach and communication, and I am happy to report that my team in City Hall has been evaluating administrative options to do just that, beginning prior to the introduction of this bill. As part of that review, we are evaluating best practices

nationally, including options for the better use of technology including e-mail and the Internet. Although we have not completed our review and recommendations to the Mayor, I anticipate those recommendations to include the points the bill seeks to address. However, because I also anticipate our recommendations to be broader than just the provisions of this bill, we would like to work with you to ensure your concerns are addressed in any recommendations we set forth, and to see what other opportunities may exist to enhance the program administratively. Accordingly, at this time, we request that the Council allow us time to complete our consultation with it, and our review of the issues. Thank you.



**TESTIMONY OF
CITIZENS UNION OF THE CITY OF NEW YORK
ON REQUIRING ALL CITY AGENCIES ELECTRONICALLY
TRANSMIT COPIES OF PROPOSED RULES IN A TIMELY MANNER**

**Before the New York City Council
Committee on Governmental Operations
DECEMBER 6, 2007**

Good Morning, Chair Felder, members of the Government Operations Committee, and other members of the City Council. My name is Rachael Fauss, and I am the policy and research associate of Citizens Union of the City of New York, an independent, non-partisan, civic organization of New Yorkers who promote good government and advance political reform in our city and state. For more than a century, Citizens Union has served as a watchdog for the public interest and an advocate for the common good.

In appearing before you today, Citizens Union expresses support for the Intro. 643.

We believe that it will improve communication about, and awareness of, rules proposed by city agencies. It will also increase transparency about new rules that are being proposed and allow possibly for greater comment and input by the citizens of New York before the rules are promulgated. This measure will aid in making the government of the City of New York more effective and accountable to New Yorkers.

We urge the Council to pass the Int. 643.

Chair Felder and other members of the City Council, Citizens Union thanks you for holding this important hearing and for making it possible for us to express our views.

