

**Testimony of the Department of Buildings And Fire Department  
New York City Council  
Committee on Housing and Buildings  
Carbon Monoxide Alarms  
March 17, 2014**

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Good afternoon Chairman Williams, and members of the Committee. I am James Colgate, Assistant Commissioner of Technical Affairs and Code Development at the Department of Buildings, and have with me; Julian Bazel, Fire Department Counsel, and Fire Prevention Deputy Assistant Chief Joe Woznica, from the New York City Fire Department. Thank you for allowing me the opportunity to testify in support of this legislation, which will continue the efforts to improve safety for all New Yorkers.

We are here today to discuss Intro 11, a bill to amend the Building Code by requiring carbon monoxide alarms and detectors in assembly spaces. The Department of Buildings and the Fire Department agree with the Council's concerns regarding carbon monoxide safety and your efforts to increase awareness with regard to past incidents and new technologies that may decrease the risk of future carbon monoxide related deaths. Carbon monoxide is a colorless, odorless, tasteless and non-irritating toxic gas. Sometimes called the "silent killer," it is completely undetectable by human senses. As a result, hundreds of people are killed each year nationwide by accidental CO poisoning, and thousands are permanently injured. The risk of CO poisoning increases in the winter in particular, when well-insulated, air-tight homes and malfunctioning heating equipment can produce dangerously high, and potentially deadly, concentrations of CO.

This proposed legislation would amend section 28-312.6 and 908.7.2 of the Building Code, and would require CO detectors to be connected to a control panel monitored by a central station for the following occupancies, included but not limited to:

- A-1: movie theaters, symphony, concert halls and television and radio studios admitting an audience
- A-2: Catering halls, night clubs, restaurants and bars.
- A-3: Museums, courtrooms, houses of worship, and bus terminal waiting areas.

Currently, the Code focuses requirements for carbon monoxide detecting devices mostly on dwellings, schools and sleeping quarters, where there are long durations of human occupancy. The heart of the issue is early detection of the presence of CO from the source of the emissions. Intro 11 would require a CO detector at the source of potential emissions (fuel burning locations), and further, CO detectors will be required throughout other areas leading from the potential sources of CO emissions. While we agree with the use of the detectors at the source, and perhaps in corridors above garages, requiring additional detectors along corridors seems to have minimal benefit and may add significant cost.

Incorporating these requirements in new buildings, regardless of occupancy groups, would present few practical impediments. However, in existing buildings, there may be some practical difficulties in implementing Intro 11.

The issue is that the simple alarms that you can purchase at a hardware store are listed for residential occupancies only – they are not listed for commercial applications. Instead, the installation of a carbon monoxide detection system in a commercial occupancy would require a system of detectors and wires connected to a central station alarm monitoring panel that can send an alert via the phone lines. If the business currently has a central station alarm monitoring alarm panel, the monthly costs for monitoring are not greatly increased. But even if there is a central station alarm monitoring panel, costs are not insubstantial – these include the fees for a consulting engineer to design the wiring and detector location and to file those plans with the Fire Department, the costs paid to the contractor to install the wiring and obtain sign-off, and then finally the costs to restore the wall and ceiling finishes. In those buildings that do not currently have a central station alarm monitoring panel the cost can be greater. These buildings include those that may not have a fire alarm system, or may have a fire alarm system without central station alarm monitoring panel. Therefore, the installation of even one CO detector would require an engineer, filing with and inspection by the fire department, and the installation of a wiring and transmitter to a central station. Some existing buildings may already have a transmitter, but because the CO alarm is required to be transmitted as a separate zone, existing transmitter may not be able to support an additional zone and so the transmitter may have to be upgraded as well.

The number of detectors would be a function of the layout of the corridors and floors if there is more than one floor. As far as sub-uses, Items 2 and 3 of §908.7.2 could be written clearer – these items were written with only schools, hospitals and day care in mind and require the detectors only in the corridors. This bill would add assembly occupancies into the mix, and these occupancies often do not have corridors. In addition, the proposal does not clearly address situation where the Group A (assembly) occupancy is several stories removed from the carbon-monoxide producing equipment. An example would be a conference room, which is Assembly occupancy, on the 2nd Floor of Group B (business) occupancy. CO detectors connected to a central station alarm monitoring panel would be in the cellar boiler room, but because the Assembly occupancy space is 2 stories above the boiler, no detectors are required on the 2<sup>nd</sup> story.

We concur with many of your thoughts behind the introduction of this legislation. The Fire Department believes that the first line of defense is prevention. Their educational literature and safety programs warn homeowners about preventing or minimizing the potential for CO gas exposure in their homes. The second line of defense is the proper maintenance of heating and combustion equipment. The third line of defense against the dangers of CO is a CO alarm. We know from experience that properly installed and working CO alarms can provide an early warning of the presence of CO, allowing sufficient time for occupants to either escape or take appropriate action, before the deadly gas can build up to dangerous levels.

You will hear shortly from the other stakeholders and experts in related fields. They will provide their opinions on the bill, the cost and the technology. We remain open to getting more input and hearing all sides, and we are open to continuing discussions with the City Council. We thank you, for the opportunity to speak with you today about the proposed legislation. We would be happy to answer any questions you may have.

**Testimony before the Committee on Housing and Buildings  
of the New York City Council on Int. No. 0011-2014**

**By Angela Sung Pinsky  
Senior Vice President, Management Services and Government Affairs  
Real Estate Board of New York  
March 17, 2014**

Good afternoon Chairperson Williams and members of the Committee on Housing and Buildings. The Real Estate Board of New York, representing over 15,000 owners, developers, managers, and brokers of real property in New York City, thanks you for the opportunity to testify about carbon monoxide ("CO") detectors in assembly spaces. We also appreciate that the New York City Council has been proactive in seeking our comments and in collaborating with building owners.

REBNY supports the City's efforts to more efficiently and effectively handle public health risks associated with CO accumulation. In the wake of recent events, the need for new CO safety measures is clear. REBNY supports the use of CO alarms, rather than detectors, in the proposed areas. However, we have the following concerns regarding requiring CO detectors that transmit a signal to a central supervising station in areas without CO-producing equipment:

1. The proposal would add new costs to the many buildings without central supervising stations
  - Older buildings and those with less than 30 sprinkler heads are not required to have central supervising stations
  - Installation of a fire panel and monitoring points may cost \$10,000 or more
  - Installing a central panel may also trigger compliance with previously inapplicable regulations that may cost millions of dollars if an emergency generator becomes necessary
  - Proposal: Require CO alarms, rather than detectors, with localized alerts in the absence of a central supervising station
2. There is a large potential for costly false alarms for buildings with supervisory stations
  - In many instances, CO accumulations can be remedied without emergency responders, such as when they are the direct result of temporary ventilation blockages
  - Modern CO detectors are notoriously sensitive to the ambient conditions that surround them, such as the presence of: some cleaning solutions, deodorant and hair sprays, and high humidity
  - FDNY 10-35 violations for unwarranted alarm system activations cost \$1,000 for the first offense and \$5,000 for the second; so multiple false alarms can be exceedingly costly, especially when there are multiple public assemblies in a single building
  - Proposal: In instances where a central supervising station exists, CO alarms should only be supervisory without automatic transmission to the FDNY
3. The specific requirements for the CO detectors are unclear
  - The bill does not state the necessary number of CO detectors nor the needed spacing between them
  - The efficient detection of CO may be prevented by the physical characteristics of many public assemblies, such as high ceilings, terraces and decks, and partially open air spaces
  - Proposal: The required placement of CO detectors needs to be clarified

4. The compliance time frame is infeasible

- The planning and design stages, requisite DOB and FDNY permitting and approval processes, as well as the hiring and installation phases, may each extend beyond the proposed May 1<sup>st</sup> deadline, especially if buildings are required to install central supervising stations
- There are also a limited number of professionals qualified to handle these installations, May 1<sup>st</sup> may be a burdensome deadline for compliance given the number of public assemblies in the City. The cost of these installations will increase with demand given the short supply of professionals as well.
- Proposal: Allow all existing assembly spaces at least one year to install localized CO alarms given a similar time period was employed for residential spaces in the past

We recommend that the proposal be amended to require CO alarms with built-in sounder bases within existing occupancy group A-1, A-2, and A-3 spaces with CO-producing equipment, the surrounding corridors, as well as all corridors surrounding enclosed parking. These alarms would feature a localized alert, and, where central supervising stations already exist, would also be capable of transmitting an audible and visual supervisory alarm.

With modification to address the aforementioned concerns, REBNY supports the proposal and the City's efforts to monitor CO levels in place of public assembly. Thank you again for the opportunity to comment. We look forward to continuing our conversation with the Council to continue improving the safety of the City for all New Yorkers.

## FOR THE RECORD

# NYS<sup>△</sup>FAH

NEW YORK STATE ASSOCIATION FOR AFFORDABLE HOUSING  
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### **NYSFAH testimony before the NYC Council Committee on Housing and Buildings Intro 11: Requiring carbon monoxide detectors in certain assembly spaces. March 17, 2014**

The New York State Association for Affordable Housing (NYSFAH) would like to thank Chair Williams and the members of the Committee on Housing and Buildings for the opportunity to testify today on Intro 11.

NYSFAH is the trade association for New York's affordable housing industry statewide. Our 300 members include for-profit and nonprofit developers, lenders, investors, attorneys, architects and others active in the financing, construction, and operation of affordable housing. Together, NYSFAH's members are responsible for most of the housing built in New York State with federal, state or local subsidies.

NYSFAH commends the Council's commitment to ensuring the safety of New York City's residents and agrees there is need for new Carbon Monoxide ("CO") safety measures. However, requiring CO detectors that transmit a signal to a central supervising station in areas without CO-producing equipment may not remedy the public health risk posed. While the intention of this bill is admirable, there are a number of concerns that need to be addressed before these requirements are made law.

Some of the items deserving of further thought include: the intended and unintended consequences on existing buildings without central supervising stations, the lack of prescriptive spacing requirements for the detectors, and the extremely tight timeline for implementation proposed. We believe additional time is necessary for consideration and better understanding the impact the bill will have on mixed-use affordable housing with commercial or community facility components.

Thank you again for the opportunity to comment, and we look forward to working with you to continue these necessary safety efforts.

March 17, 2014

Contact: Alexandra Hanson, NYC Policy Director, NYSFAH (646) 473-1209

## FOR THE RECORD



### Council of New York Cooperatives & Condominiums INFORMATION, EDUCATION AND ADVOCACY

250 West 57 Street • Suite 730 • New York, NY 10107-0700

TESTIMONY BEFORE THE CITY COUNCIL  
COMMITTEE ON HOUSING & BUILDINGS  
March 17, 2014

COMMENTING ON INT. 11

The Council of New York Cooperatives & Condominiums is a membership organization serving more than 2,200 housing cooperatives and condominiums which are the homes of approximately 170,000 New York families. Cooperative and condominium housing is a vital part of our City, providing home ownership opportunities that are as economically and socially diverse as the five boroughs.

As home owners, we in cooperatives and condominiums seek to maintain our buildings in the best and safest possible condition, and to comply with all laws relating to our buildings.

We applaud the consistent efforts of the City Council and this committee to ensure that all New York City buildings are safe, energy efficient, and prepared to cope with problems.

However, we must draw your attention to the cost of mandated changes, such as those included in Int. 11. It is difficult for our members to plan budgets that will enable all of their shareholders or unit owners to continue to afford to live in their units, when unfunded mandates are imposed without either advance notice or sufficient lead time to raise funds and plan properly for their implementation.

We urge you to consider the alternative proposals that the Real Estate Board of New York has offered on this issue. We encourage you to include more realistic time frames in all legislative mandates. And we wish that you would consider providing incentive programs to defray some or all of the cost of compliance, at least for buildings that are the homes of families of modest means.

Thank you for this opportunity to comment.

Mary Ann Rothman  
Executive Director



# National Fire Protection Association

John D. Caufield, MPA  
Mid-Atlantic Regional Director  
83 Creek Ridge  
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Testimony of John D. Caufield (National Fire Protection Association) to the City of New York Committee on Housing and Buildings regarding:

- Introductory 0011 – *A Local Law to amend the administrative code and the Building Code of the City of New York, in relation to requiring carbon monoxide detectors in certain assembly spaces*

March 17, 2014

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Good Afternoon, my name is John D. Caufield, I am the Mid-Atlantic Regional Director for the National Fire Protection Association (NFPA), and the retired Fire Chief from the Rochester (NY) Fire Department, where I served for almost 27 years. I thank you for the opportunity to offer testimony relating to Introductory Item 0011, which seeks to amend the administrative code and building code of the City of New York regarding carbon monoxide detectors in additional occupancies.

The *mission* of the nonprofit National Fire Protection Association is to reduce the worldwide burden of fire and other hazards on the quality of life by providing and advocating consensus codes and standards, research, training, and education. NFPA is the world's leading advocate of fire prevention and an authoritative source on public safety. NFPA develops, publishes, and disseminates more than 300 consensus codes and standards intended to minimize the possibility and effects of fire and other risks.

NFPA Codes and Standards are currently referenced in the New York City Building Code, particularly standards 13 (*sprinkler systems*), 14 (*installation of fire protection standpipe and hose systems*), and NFPA 72 – *the National Alarm Code*.

I will preface my testimony by stating that I generally support *Introductory 11*, as it seeks to improve the overall safety of those who live, work, and recreate in New York City, but I also believe that introductory 11 is silent on important technical aspects. Further, introductory 11 proposes that CO detection devices, when activated, must report to a supervised central station – this requires a certain level of technical proficiency. Proficiency standards should fall to local jurisdiction and authority, as currently exists for approved Alarm Installers in New York City.

Notably absent from *introductory 11* are details relating to:

- system design and local (AHJ) approval
- certification / approval / authorization of approved installers
- inspection, testing and final approval of a system
- performance requirements of an "approved" system
- the system requirements surrounding *signaling* to a central supervising station, as specified in § 908.7.2



NFPA Standard 720 entitled *Standard for the Installation of Carbon Monoxide (CO) Detection and Warning Equipment* (2012) contains the technical elements that would strengthen *introductory 11*. I suggest that NFPA 720 (2012) should be reviewed, referenced, and incorporated in order to meet the technical requirements of *introductory 11*.

As mentioned in my initial remarks, I am generally supportive of *introductory 11*, but suggest that it can be strengthened by clarifying technical requirements as well as providing for local approval of system design, installation professionals, and overall system characteristics and performance.

This concludes my remarks and I am happy to address any questions.

Thank you.



NEW YORK  
STATE  
RESTAURANT  
ASSOCIATION

**Comments**

**of**

**The New York State Restaurant Association**

**to the**

**Committee on Housing and Buildings  
Intro. 0011-2014**

**March 17, 2014**

**1:00 p.m.**

**City Hall – Committee Room**

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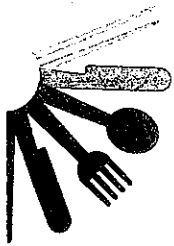
Good morning members of the Committee. My name is Melissa Autilio Fleischut and I am the President and CEO of the New York State Restaurant Association (the "Association"), a trade group that represents approximately 5,000 food service establishments in New York City and over 10,000 statewide. The New York State Restaurant Association is the largest hospitality trade association in the State of New York and it has advocated on behalf of its members for over 75 years. The Association is the voice of the restaurant industry in New York City.

New York City is one of the pillars of the culinary arts world. Our restaurants employ hundreds of thousands of New Yorkers and are the backbone of the tourism trade. As one of the most important industries in New York City, its growth and survival should be supported by all levels of New York City and New York State government. The Association has worked closely with the City to develop sound policies that will improve the safety of customers and the City as a whole, including the passage of the Polystyrene Ban, the Organic Separation law, as well as supported recent revisions to the air code and sanitation practices in the City.

The New York State Restaurant Association has serious concerns about the current version of Intro. 0011-2014. While the Association has no objections to the Council's efforts to protect the safety of employees and customers by requiring the installation of carbon monoxide alarms, Intro. 0011-2014 would require the installation of expensive, centrally monitored detectors that will exponentially increase the cost to restaurants, even though alternative carbon monoxide alarms – similar to those required by the City in residential buildings – are readily available.

The Association would also highlight that the expedited installation timeframe of May 1, 2014, in Intro. 0011-2014 is untenable. Buildings without central monitoring stations could not have these systems installed citywide and there are questions as to whether these systems could even be installed in all buildings.

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Everyone wants to avoid the tragedy that occurred on Long Island a few weeks ago. Hence, the Association would like to work with the Council to revise Intro. 0011-2014 to develop a bill that will provide for carbon monoxide alarms for A-1, A-2, and A-3 occupancies within a reasonable time-frame, preferably the one year window set for similar initiatives in the residential marketplace.

The New York State Restaurant Association and its members thank you for your time and consideration of this legislation and these comments. We hope that our input can lead to a better bill that will protect all concerned in a reasonable fashion.

Respectfully Submitted,

Melissa Fleischut  
President and CEO  
New York State Restaurant Association  
1001 Avenue of the Americas, 3rd Floor  
New York, New York 10018  
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739313

# ACEC New York

American Council of Engineering Companies c

## STATEMENT OF THE AMERICAN COUNCIL OF ENGINEERING COMPANIES OF NEW YORK REGARDING INTRO 11 NEW YORK CITY COUNCIL COMMITTEE ON HOUSING AND BUILDINGS MARCH 17, 2014

The American Council of Engineering Companies of New York ("ACEC New York") is one of the oldest continuing organizations of professional consulting engineers in the U.S. ACEC New York represents 270 member firms throughout New York State that collectively employ more than 20,000 people statewide, and design all aspects of the built environment. Many of our members, who have the expertise in the Construction Codes, will be called upon to design and supervise the installation of the systems required by Intro 11.

ACEC New York thanks the Committee for holding a hearing regarding this very important piece of legislation. However, after careful review of the bill by our Fire Protection Codes Committee, we have some concerns and suggest that modifications be made.

The effective date for compliance with proposed section 28-312.6 should be clarified, and respectfully, it should be extended. Section 1 of the proposed bill states that "carbon monoxide alarms or detectors shall be installed in accordance with Section BC 908.7.2 by May 1, 2014." However, Section 3 of the bill states that "[t]his local law shall take effect on October 1, 2014." We believe that the two dates will lead to confusion as to when compliance must be achieved. Additionally, because some A occupancies are complex (e.g. Lincoln Center, Radio City Music Hall), we suggest that the compliance date for existing structures be revised to at least October 1, 2015.

We suggest that the Council consider an alternative means in which it would be acceptable to use existing fire alarm notification appliances (speakers, horns, strobes, etc.) in buildings that have them already, instead of requiring them to add a built-in sounder base. In other words, if there is already equipment in place to alert occupants, we suggest allowing that existing equipment to be used.

For existing buildings, the Council should consider alternatives to the bill's requirement that "listed carbon monoxide detectors with built-in sounder bases... transmit a signal to a central supervising station..." This requirement could be read as requiring a separate signal type to the central station, which some buildings may not be able to provide without costly equipment upgrades and changes to their signal monitoring contracts. We suggest instead allowing the signal to be a sub-type of the common alarm signal transmitted from some buildings.

Finally, we request that the Council clarify the intent of the language requiring the placement of carbon monoxide detectors in close proximity to the potential carbon monoxide source in paragraph 2 of section 2 of the bill. The current language could be interpreted as necessitating monitors only in the corridor on the same floor of the source, throughout the entire floor above (instead of just the corridor) and throughout the entire floor below (instead of just the corridor). We expect the intent of the bill is to have monitors only in the corridors of those three consecutive floors, but we respectfully request that the Council clarify its intent.

ACEC New York thanks you for the opportunity to testify on this bill and we stand ready to assist this Committee as it continues to consider ways to make the City's buildings safer.



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**Testimony of the Manhattan Chamber of Commerce  
Committee on Housing and Buildings of the New York City Council**

**Int. 0011-2014**

**By Nancy Ploeger, President, MCC**

**March 17, 2014**

Although our chamber supports more efficient and effective ways to protect citizens from CO emissions and eminent dangers, we do have concerns with the cost differentials this bill will impose and suggest further discussions on possibly solutions that still reach the goal but would be less costly for businesses and building owners to install.

Our main concern is with the call for detectors to be connected to central supervising stations rather than alarms with localized alerts. The costs could be upwards of \$10,000 per location for this set up at for bars, clubs, restaurants, museums, churches, galleries, and other public assemblies that have boilers or water heaters without a fire panel. We propose that where there is a lack of central supervising stations, CO alarms be installed, rather than detectors. This would enable immediate response by those in the buildings and could save precious time rather than depending on a signal sent to a central supervising station.

And in instances where a central supervising station exists, CO alarms should only be supervisory as there would be potential for costly false alarms. Also in many cases, CO accumulations can be remedied immediately without emergency responders.

And the bill does not address the necessary number of CO detectors or spacing needs, etc. There is clarification needed on these points.

And once there is a final determination, the businesses and building owners need time to implement this. The May 1<sup>st</sup> deadline being discussed is not feasible and just as in the past, where residential buildings were required to install CO alarms, they were given one year to respond.

As Department of Buildings and the Fire Department are also requesting more dialog on this issue, we hope that you will continue to discuss this important issue with the stakeholders to find a viable and lest costly solution while still achieving the goals of protecting our citizens.

We certainly support the goal of this bill but hope there will be clarification on the language and some modifications.

Testimony before the Committee on Housing and Buildings  
of the New York City Council on Int. No. 0011-2014  
By Vincent LeVien  
Director of External Affairs, Roman Catholic Diocese of Brooklyn

The Roman Catholic Diocese of Brooklyn, representing the needs of 1.6 million Catholics in over 200 parishes throughout Brooklyn and Queens, believes additional consideration needs to be given to Intro. No. 11 before it is voted into law. While greater attention should be given to carbon monoxide accumulation in light of recent events, we have grave concerns regarding the unintentional costs that may be levied against places of worship without commensurate safety benefits. We look forward to working with the City Council and other interested parties to ensure the most appropriate safety measures are implemented. The Catholic Community Relations Council, which represents the Archdiocese and Diocese on local legislative and policy matters, and whose Director Joseph Rosenberg is ill and unable to attend this hearing, also is concerned about this measure and its possible fiscal impact on hundreds of church properties.

Thank you for the opportunity to comment.



**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 11 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 3/17/14

(PLEASE PRINT)

Name: Dwayne Andrews

Address: Cozen O'Connor, 277 Park Ave, NY, NY 10172

I represent: American Council of Engineering Companies of NY

Address: 8 W. 38 Street, NY, NY 10018

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 11 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Angela Pinsky

Address: Rehoboth - 570 Up Mahan Ave

I represent: Real Estate Board of NY

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 173 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 3/17/14

(PLEASE PRINT)

Name: Nancy Clark Franklin

Address: Assistant Commissioner

I represent: Environmental Disasters + Injury Prevention

Address: DOHMH

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 0011-2014 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 3/17/14

(PLEASE PRINT)

Name: JAMES W. VEESOCKI

Address: 1 Huntington Quadrangle, Suite 4C10 Melville NY 11747

I represent: NYS Restaurant Association

Address: 1001 6th Ave, 3rd Flr NY, NY

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

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in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: James Colgate

Address: Assistant Commissioner

I represent: Dept of Buildings

Address: 280 Broadway

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

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in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Chief Joseph Wornica

Address: FDNY Chief

I represent: Five Prevention

Address: \_\_\_\_\_

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Julian Bazel

Address: Counsel

I represent: FDNY

Address: \_\_\_\_\_

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THE CITY OF NEW YORK**

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in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Joseph Wozniak

Address: Assistant Chief

I represent: FDNY

Address: \_\_\_\_\_

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in favor  in opposition

Date: \_\_\_\_\_

Name: Julian Pazel (PLEASE PRINT)

Address: FDNY Department

I represent: Department Counsel

Address: \_\_\_\_\_

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Appearance Card

I intend to appear and speak on Int. No. 11 Res. No. \_\_\_\_\_

in favor  in opposition

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Name: JOHN CAUFIELD (PLEASE PRINT)

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I represent: NATIONAL FIRE PROTECTION ASSN.

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Please complete this card and return to the Sergeant-at-Arms