

State of New York
Public Service Commission

CASE 14-G-0357 In the Matter of Revising 16 NYCRR Gas Safety
Regulations for Consistent Application of More
Stringent Federal Gas Safety Standards in 49 CFR

Comments Submitted On Behalf Of the
Master Plumber's Council of the City of New York, Inc.

I. Introduction

These comments are submitted on behalf of the Master Plumber's Council of the city of New York, Inc. (MPC or Council) in response to the Notice of Proposed Rulemaking issued on September 11, 2014 in the above-referenced matter.¹ The Council welcomes the opportunity to provide its views and relevant information to the New York State Public Commission (Commission or PSC) on the proposed revised regulations before they are finalized. Although the planned revisions involve several matters, these comments will be limited to the issues of (1) requiring professional plumbers to contract with and be operator qualified by the local gas utility and to undergoing drug and alcohol testing before performing work on certain inside gas piping and, (2) preemption of local laws with regard to plumbing work on inside piping.²

II. Interest of MPC

The MPC is a trade association whose membership is comprised of licensed master plumbers and their affiliates who conduct business within New York City. The Council represents master plumbers and their businesses and promotes the benefits of hiring a

¹ These comments are supported by The New York Alliance for Fair Competition, Inc. (NYAFC or Alliance) a coalition of HVAC businesses, including licensed plumbers, that provides information and input concerning the impact of government and utility activities on the competitive marketplace.

² These issues arise out of the proposed amendment to the "service line" definition at 16 NYCRR 255.3(a) (29).

professional, licensed and insured plumbing business. In addition, the Council provides its members and the public with education and clarification on a wide range of plumbing issues including local code requirements and safety. MPC's activities not only advance the interests of its members but also benefit all city property owners and tenants by advocating for qualified, licensed and safe professional plumbing services.

The Council has a direct interest in this rulemaking because of its potential to require master plumbers and their employees to be under contract with and be operator qualified by the local gas utility (which includes drug and alcohol testing) before performing work on certain inside gas piping. Specifically, the proposed regulation change would preclude licensed plumbers from performing any work on inside gas piping that is installed between the first accessible fitting inside a building to the gas meter. As more fully described below, this result would be unduly burdensome on licensed master plumbers and the customers they serve. Moreover, there is no reason to mandate additional requirements or preempt local laws that have proved effective in protecting the public, in regulating professional plumbing services, and in allowing businesses to compete for customers in the marketplace.

III. Comments

The Commission has undertaken this rulemaking to revise portions the State's Gas Safety Regulations so that it may "make its annual 49 USC § 60105 certification to the U.S. Department of Transportation that the Commission has adopted all applicable federal gas safety standards and thereby remains eligible for federal funding" (NYS Register 9/24/14 p. 19). MPC understands and agrees that the state should make all needed changes to assure compliance with federal rules. However, the Council strongly requests that the Commission approve and accept existing and proven regulatory laws and practices as complying with the revised definition to

allow master plumbers to continue to provide services to customers on inside gas pipes without having to contract and qualify with utilities.³

A. Licensed, Trained and Qualified Master Plumbers are Already Performing Plumbing Services on Inside Piping

Licensed plumbers in New York City have been safely installing, altering, repairing, and maintaining gas pipes in buildings under the authority, supervision and inspection of the City and local gas utilities for decades. The Department indicates that adopting the federal definition of “service line” would have the effect of preempting local laws and requiring plumbers to contract with and become qualified operators of local gas utilities which include drug and alcohol testing (NYS Register 9/24/14 p.20). Applying the rule in such a manner would ignore the existing comprehensive legal and regulatory system that assures professional and safe plumbing service is performed on inside gas lines.

Accompanying these comments is a statement made by Executive Director John DeLillo, Jr. (MPC statement), the information of which was provided during a stakeholder meeting. This document and its exhibits detail the substantive reasons why an alternative to preempting local laws and to requiring plumbing firms to contract with and be qualified operators of local gas utilities should be found. Specifically, the MPC Statement describes the comprehensive New York City and utility requirements for licensed plumbers. Included is a list of all relevant provisions of the NYC Administrative Code and the requirements, procedures and documents that must be provided to the local gas utility prior to the initiation or restoration of gas service to any building.⁴

³ It must be stressed that the rule revision and the proposed contract and qualification requirements intended to be placed on licensed plumbers did not arise from safety concerns or from a lack of government oversight of the plumbing industry.

⁴ All requirements can be verified with NYC and the Utilities.

As demonstrated by this thorough regulatory framework, the safety of the public is being maintained by qualified professional licensed plumbers whose work is under the oversight of the City and the local utility. The current system not only requires that people perform the work are highly qualified, but that each individual project is performed in accordance with the strict criteria of code provisions and is reviewed, tested, and inspected before gas is initiated or restored.

Under the present system, licensed master plumbers or their employees do not work on lines containing gas and are not allowed to reestablish gas service (MPC Statement pp. 1-2). Commencement or restoration of gas service lies in the exclusive purview of the utility. In fact, after a licensed master plumber completes an alteration, repair or new project, there are specific procedures that must be followed (*Id.*). New York City licensed master plumbers presently are qualified and perform gas piping work and should be permitted to continue to do so without extra administrative and cost burdens.

B. Preemption of Local Laws Would Eliminate Essential Government Oversight

The Council is very concerned that the proposed revisions would preempt local laws. As explained above, the City has in place extensive codes and requirements to ensure that plumbers are trained, qualified, licensed, and authorized to properly and safely perform plumbing services for the public. Relying on the local utility to qualify and have a contract with licensed plumbers is not a substitute for government supervision. The gas utility does not have the time, resources and ability to perform regulatory oversight as thorough as the government.

Depending on the extent of preemption, requiring utility contracts and contractor qualification could involve a massive undertaking that LDC's may not be equipped to manage. In contrast, local governments in general, and New York City in particular, already have the

means and immeasurable experience in regulating plumbers through licensing requirements, project requirements, and enforcement actions. Finally, MPC is unsure whether preempting local laws could have unforeseen consequences affecting public safety. Without local government supervision, experience unqualified individuals may be able to perform work on inside piping, despite requiring operator qualification. Given the significant safety risks involved, preempting proven and effective local laws should be avoided.

C. Requiring Licensed Plumbers to Contract with Local Gas Utilities Would Be Burdensome and Costly

Without more information, MPC cannot know exactly what contracting with the local utility or obtaining operator qualification will involve and how it will fully impact plumbing businesses. There are no specifics provided in the proposed rule modifications explaining the contract process or the operator qualification procedure. For instance, there has been no description of contract terms and conditions; duration of the contract; costs or fees to apply or contract; complaint and/or grievance procedures; disqualification processes; enforcement procedures; possible sanctions; and termination provisions.

The same lack of details exists with regard to operator qualification. We are unaware of what criteria would be applied to operator qualification programs that must evaluate, train and test plumbing professionals for inside pipe service. MPC wonders whether this would include the same education as those required to be qualified to operate on gas service mains and lines. This is important because master plumbers should not have to undergo training and testing to work on gas service mains and lines that are customarily considered outside building pipes.

Meeting the contract and operator training mandates would be especially challenging for the many master plumbers who do business in multiple gas service territories. Although there

may be some uniformity in contracting with the LDC and in becoming a qualified utility operator, each utility may have separate contracting conditions, distinct training requirements, and different costs for application, training testing, and approval. Moreover, despite the contemplated 90 day compliance period (NYS Register 9/24/14 p. 20), there could be a considerable delay before each utility could design, receive approval for, and implement these programs.

With regard to cost, the expenses of having to apply to and contract with each utility, and satisfy all requirements to secure utility operator qualification, including drug and alcohol testing, would increase the cost of business for the licensed plumber. Although we do not have specific details, MPC understandings that this training mainly deals with qualifying individuals to work on street gas mains and service lines. Moreover, the program is believed to cost thousands of dollars per individual and involves days of instruction.

Without any specifics, it is difficult to determine the exact cost of meeting the new requirements, but the expenses would undoubtedly be burdensome, especially to the smaller businesses. Incurring these extra expenditures may result in the loss of jobs and may have to be passed on to consumers. Also, there would likely be an enormous cost to each utility to administer both the contract and the operator qualification process. Again, these expenses would probably have to be passed on to the ratepayer.

D. Applying an Interpretation of "New" Construction that is Inconsistent With Common Practice Would Create Inequities and Confusion

Another significant concern is that the proposed revised rule applies only to repair and alteration work and would not apply to "new construction." The Council is unaware of any reason why a licensed plumber's ability to install new piping would be different from being

qualified to modify or repair existing piping. Master plumbers and their firms perform both types of projects now. As noted in the accompanying MPC statement, the work, testing and inspection procedures are the same (MPC Statement p.5).

In addition, it is not entirely clear what would be considered "new construction" under the proposed revisions. For example, "new" service piping being installed inside of an existing building may not be subject to the regulations. However if the "new" service piping connects to an existing section of piping, then that remaining portion of the inside pipe would be subject to the regulations. These sets up a scenario where a licensed master plumber would be qualified to install a "new" section of gas pipe in a room but be disqualified from being able to install the remainder of the service piping that connects to the existing system (MPC Statement p.5). While clarification on this point is both desired and necessary, the preferable solution is to maintain the current system thereby avoiding disputes surrounding the definition of new construction.

E. The Proposed Revision Would Have an Adverse Effect on Competition

At present, the plumbing industry, though intensely regulated, operates in a free and vibrant marketplace. Plumbing firms compete with each other for customers by promoting their services on a number of qualities including price and quick response times. It is unclear from the notices in this proceeding, but the utility could establish the price of plumbing work through their contract. This would interfere with the free operation of the marketplace in the setting of prices.

With regard to response times, under the proposed rule, both customers and master plumbers would have to wait for a qualified operator to arrive and perform work on the portion of line inside the building to the meter. Requiring plumbers to work with qualified operators over whom they have no control could cause delays. Thus, the inability to directly manage the time

of installation, repair or alteration and the added circumstance of working with additional individuals is both inefficient and impacts competition and customer service.

F. The PSC Should Defer the Effective Date of the Contracting and Operator Qualification Requirements

As described above, the effects of the revised “service line” definition are complex and would negatively impact licensed plumbers. Should the regulations be adopted without any modifications, and should the Commission not allow for the existing regulatory and oversight system to continue, the Council suggests that the requirements to contract with and be operator qualified by the local gas utility be deferred. At present, the Commission is contemplating a 90 day period within which the regulated community must comply with the regulations (NYS Register 9/24/14 p.20). This period is too short for the establishment of a new regulatory scheme that directly affects plumbers, utilities, local governments and customers.

Interestingly, the same SAPA Notice states that “...Staff anticipates commencing a comprehensive revision to Part 225 in the future...” (*Id.* at p. 21). If it is the Department’s intention to conduct a complete revision to Part 225, then MPC would recommend that the issues of contracting and operator qualification could be deferred to that proceeding.

G. Other Local Government Programs Should Also Be Considered

The Council has described the extensive requirements to qualify for a master plumber license and to service inside gas piping in New York City and also explained the work verification and inspection requirements practices of local utilities for this work. The Council would like to note that other local governments have similar regulatory schemes and utility requirements that have successfully functioned to protect public safety for inside pipe work.

Many of our members operate in areas outside the City and will experience the same burdens and difficulties discussed above in those locales as a result of the proposed revisions. Plumbers in these other jurisdictions are subject to local government codes and local gas utility requirements comparable to the NYC requirements. Therefore, we request that the Commission also consider substituting other local comprehensive oversight systems instead of imposing contracting, operator qualification, and drug and alcohol testing mandates.

IV. Conclusion

For the above stated reasons, the Council respectfully requests that the Commission eliminate the mandates of requiring licensed plumbers to contract with their local utility, obtain utility operator qualifications, and meet the drug and alcohol testing requirements. Instead, MPC urges the Commission to substitute the existing regulatory and oversight system which is presently ensuring public safety by requiring plumbers who are qualified by their local government, and inspected by their local utilities, to perform this gas pipe work.

Respectfully Submitted,



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Attachment

Statement of the Master Plumbers Council of the City of New York, Inc.



Master Plumbers Council of the City of New York, Inc.

Aka

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Case 14-G-0357 - In the Matter of Revising 16 NYCRR Gas Safety
Regulations for Consistent Application of more stringent Federal Gas
Safety Standards in 49CFR

The Master Plumbers Council of the City of New York, Inc. (the
“NYCMPC”) is a professional trade association whose membership
consists of licensed master plumbers and their affiliates in the City of
New York. The NYCMPC strives to promote the licensed plumbing
industry and the benefits of hiring a licensed and insured firm. In
addition, we provide education and clarification on a wide assortment
of code issues. **This not only benefits the trade, but all NYC property
owners and tenants who are concerned about a legal and safe
plumbing installation.**

Thank you for the opportunity to comment on the proposed
amendments to 16 NYCRR Part 255 -Safety, Subchapter C. Our
association has serious concerns that, under the proposed rules, local
laws would be preempted and only firms who are in contract with the
utilities, whose employees are utility operator qualified and who have
undergone drug and alcohol testing, would be authorized to repair or
alter that portion of inside gas piping between the first accessible

fitting and the gas meter. Building owners and tenants would have to make arrangements
with their local gas utility to make alterations or repairs to inside gas piping that is installed
between the first accessible fitting inside a building and the gas meter.

The MPC agrees with the federal definition of service line piping extending to the outlet of the
gas meter. The local code definition for this location is called the point of delivery. By
definition, for natural gas systems, the point of delivery is the outlet of the service meter
assembly. The point of delivery is the location where the enforcement of the local code
begins.

Under the present system a licensed master plumber is only permitted to shut off the flow of
gas up to a three family home (except in the case of an emergency) and is **NEVER** allowed to
reestablish gas. Only the utility is allowed to do that. Only the utility is allowed to shut the gas

to buildings other than one to three family buildings. This being said, the licensed plumber or their employee is never, at any time, working on live gas lines; only on gas piping that is shut down and purged. In addition, the NYC FGC 406.6.2.2 requires that the utility be notified in advance when gas to a building is going to be shut down. After licensed master plumbers complete the alteration or repair work they submit checklists and affidavits to the utility for review and approval. If the paperwork is in order, a field inspection is scheduled between the utility and the licensed master plumber. The first inspection is a visual inspection of the work to verify it has been done according to specification. If that inspection passes then the utility will release an order to establish or reestablish gas at the location. When utility employees are again sent to the site they are met by the licensed master plumber and a second inspection is conducted. Both a visual inspection and physical tests are performed on the piping system by the utility personnel. When the utility representative is satisfied that the work is according to specification they then establish gas into the customer's system.

To recap, the existing system is set up so that the utility shuts off the gas to a building, collects checklists and affidavits from the licensed master plumber, and performs a minimum of two field inspections. Only after the utility is satisfied that all work is in compliance **the utility establishes gas to a building. The licensed master plumber is not permitted to work on a live service line.** The utility will shut off the gas supply and purge the system on a planned shutdown. The only time gas is introduced is after the utility inspection is done by the utility representatives. This fact alone should remove the requirement for operator qualification by the utility.

Under the proposed changes the local authority that permits licensed master plumbers to do this work would be preempted. We could understand that in some localities where there is no license or code structure in place to ensure that the installers are properly qualified that this rule change may be required. However, in New York City that is not the case and we would like to go into some detail as to why our current licenses and code structure would provide adequate levels of protection to the general public to meet or exceed the federal guidelines.

New York City has a comprehensive code system in place that provides for the licensed master plumber to safely install, alter, and repair any gas service piping as defined in this rule. To obtain a Master Plumbers License a candidate must comply with all of the rules and regulations set forth in Article 408 of the Administrative Code of the City of New York. Recently, additional requirements call for the candidate to serve time as a Registered Journeyman plumber as per Article 409. Licensed master plumbers are highly trained, proficiency tested, and investigated by the local authority before they are issued their license. After they are licensed there are additional regulations and stringent requirements for the continued operation of a licensed plumbing business. One of those requirements is the need to complete continuing education as per section 285-401.14. Some of the code sections that apply are listed at the end of this statement.

One major concern is that, if enacted, this rule will remove the requirement for this work to be

done by employees who are in the direct employ of a licensed master plumber. The rule states that this work shall be done by professional plumbers but does not define this term. Generally the service work inside of the building up to the point of delivery is done by licensed master plumbers. All licensed plumbing firms are required to have New York City locations (NYC Administrative Code 28-401.18). This generally means they are local firms and employ local plumbers. Changing this rule may have the adverse effect of eliminating some of these jobs.

If enacted as proposed, this regulation could have a negative impact on the general public which this Commission serves. In the event of a shutdown of an existing gas service for alterations or repairs, the owner will have to wait for the utility (or their approved contractor) to complete the work prior to gas restoration. Presently there is a system in place that allows for the licensed master plumber to work in conjunction with the local authority and the utility to restore gas the same day it is taken out of service.

In order to maintain the same level of service, the utility would have to retain a large number of firms under contract with many utility qualified operators. The local utilities are generally understaffed and presently the wait time for inspections and restoration can cause unacceptable delays.

The NYC Buildings, Housing, and Maintenance Code requires that all occupied structures be provided with heat and hot water. Extended delays in service restoration may require owners and tenants to provide temporary heat and hot water through the use of expensive mobile boilers. Loss of cooking gas is not generally considered an emergency but could be a major inconvenience if occupants have to wait an extended period of time for gas restoration. In commercial applications where gas is essential for the business to operate (restaurants, bakeries, etc.) extended outages might cause them to lay off workers until gas is restored and they may suffer irreparable financial losses. Operating within the present system, the licensed plumbing industry provides a fast response time and a high level of service. This helps to minimize the time it takes to restore gas to a building after an unplanned outage.

The present system provides for free market pricing and fast response times. Owners and tenants can hire a licensed master plumber based on price and availability. Under the new system, a different pricing structure will be created that removes competitive pricing, as the utility will set the rates. It is possible that residents of New York City may have two different pricing structures for this work since the city is served by two utilities. Once the utilities have a monopoly on this work, the incentive for quick response that exists in the free market could be lost. Owners and tenants, however, will have no options other than to utilize the utility.

Due to staffing shortages, the utilities sometimes have slow response times in aiding their rate payers when gas needs to be restored after an outage. This has been a major issue for all parties involved trying to reestablish gas after an unplanned service interruption or planned alteration. Requiring the utility to add another level of coordination with subcontractors may

cause further delays. This is already evident in the utility's inability to contract with gas service main subcontractors in numbers sufficient to keep up with the oil to gas conversion market. There is a current backlog in installing these services. There is also currently a two month delay for the utility to conduct a final inspection prior to setting the new gas meter and establishing gas for oil to gas conversion project. This is an inconvenience for an owner in economic terms. Delays in restoring gas for heating, hot water, and cooking after an outage could prove hazardous in inclement weather and would be intolerable.

This brings us to our next point, which is public safety. We are concerned that if response time increases and noncompetitive pricing drives cost up that owners and tenants may not call the utility when a problem arises. They may attempt to circumvent the process by using unauthorized and unqualified persons to try to make the repairs. The Master Plumbers Council is a proponent of public safety. It is our belief that these new requirements may do nothing to increase public safety but may do a lot to create angst amongst the general public. We believe that the present system in place is more than satisfactory to provide a level of protection to the public that meets or exceeds the federal guidelines.

The Administrative Code lists the following requirements (Exhibit A)

- 28-105.1 Requires a permit prior to repairing, altering, or installing any gas piping system
- 28-105.4.1 Provides for the emergency repair of system piping
- 28-105.4.3 Provides for the repair of gas piping by a public utility
- 28-401.3 Defines plumbing as all gas piping within any building
- 28-401.4 Defines requirements of a license
- 28-401.6 Defines qualifications of the applicant
- 28-401.8 Investigation of the applicant
- 28-401.9 Details insurance requirements
- 28-401.14 Defines requirements for continuing education
- 28-401.19 Lists the reasons a licensee may be fined or have their license revoked for code violations
- Article 408 Master Plumbers License required
- 28-408.1 Provides that it is unlawful for anyone to perform plumbing work unless they

meet this code section requirement

Article 409 Journeyman Plumber Registration

Chapter 4 of the NYC Fuel Gas Code lists the following requirements for piping installation and testing (Exhibit B)

- 401.1.1 Details the requirements for service piping up to the point of delivery
- 401.3 Details the requirements for modifying or adding to an existing system
- 402.3 Details the required pipe sizing
- 403.1 Details pipe size and limitations
- 403.10 Details the piping joints and fittings
- 404.1 Details the prohibited locations for installing gas piping within buildings
- 406.1 Details the inspection process required to be completed prior to establishing gas into a building. It also establishes procedures for qualifications of welders and when piping must be welded and radiographed. All piping shall be pressure tested
- 406.4 Details the required test pressure measurement
- 406.4(2) Details that meter piping shall be pressure tested
- 406.6.2.2 Details that the utility must be notified by the department when any alterations, extension, or repairs are to be made to any GAS METER or gas distribution piping

Appendix E Details all requirements for Meters and gas piping (**Exhibit C**)

The utilities also require that various checklists and affidavits are provided before gas is introduced into any piping system. All work done by licensed master plumbers is on a dead pipe system. The following are some of the requirements a licensed plumber must follow. Also included, are affidavits a contractor is required to provide prior to gas being introduced into a system (**Exhibit D**):

Page 36 Required test pressure and duration

Page 36 Restoring gas service after repairs

Page 37 Details that utility will also perform a separate physical pressure test

Page 37/38 Restoring gas service to buildings with risers

Gas checklist: Required for submission prior to gas establishment

Gas integrity affidavit: Two versions, each indicates that a pressure test has been completed

Pressure Test affidavit: Certifies piping has been pressure tested

Another concern with this proposed rule change is that the section requiring contract with the utility, operator qualification and drug and alcohol testing would not apply to “new construction”. We question the reasoning behind the licensed plumber’s ability to install new piping but not being qualified to make alterations or repairs to existing piping. The means and methods to install the piping is exactly the same. The testing and inspection procedures are exactly the same. The term “new construction” will need to be clarified. In the industry, this term would normally relate to new construction. During a stakeholder meeting, this term was also applied to “new” services being brought into existing buildings. In industry terms, this would be considered an alteration and therefore should be subject to the rule as written. That would make it conceivable that “new” service piping installed inside of an existing building would not be subject to the rule, however if the “new” pipe had to connect to an existing section of piping then that section would be subject to the rule. We find it incomprehensible that a licensed master plumber’s employee would be qualified to install a “new” section of gas service piping in a room and be disqualified by rule from being able to install the remainder of the service piping that connects to an existing system (**Exhibit E**). As stated earlier in our testimony, in all cases the operators are working on “dead” piping only and the utility is responsible to inspect and approve the installation or repair. Once approved, only the utility is authorized to establish gas into the system.

In closing, it is our understanding that the Public Service Commission has the ability to implement alternate methods that will provide the same or a greater level of public safety as those required by the Federal Government. The present system provides for allowing highly trained, vetted and regulated licensed master plumbers to do this work. It also provides a system of checks and balances. The licensed master plumbers that perform this work are regulated by both the utility and the local authority. They only work on dead service piping and all of their work is pressure tested in compliance with all codes. It is our opinion that licensed master plumbers should maintain their ability to continue to do this service work within the framework of the present system. This system has provided the highest level of safety for the general public while also providing them with the benefit of immediate response

and competitive pricing. It is our opinion that the existing system in place is as stringent, or more stringent, than the Federal guide lines and, therefore, in the best interest of the public and all others involved. It will also help to keep utility overhead costs down as they will not have to increase staffing to implement new subcontracts and create additional training classes. It could take months to implement a new system and months more until it would work smoothly.

The people of New York City have been safely provided repairs and alterations to their gas service piping for nearly 100 years by licensed master plumbers and we hope that you will allow that system to remain in place.

Sincerely,



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