Testimony of Emily W. Newman, Acting Director of the Mayor's Office of Operations, on Local Laws in Relation to Oversight Access to Agency Data and to the Format of Data in Agency Reports

In Front of the Committee on Technology
September 17, 2018 | 10 a.m.

Good morning Chairman Koo and the Members of the Committee on Technology. My name is Emily Newman, and I am the Acting Director of the Mayor's Office of Operations. Thank you for the opportunity to testify today on Intro 1094, a Local Law in Relation to Oversight Access to Agency Data, and Intro 986, a Local Law in Relation to the Format of Data in Agency Reports. I am joined today by my colleagues Laura Negrón, the City's Chief Privacy Officer; James Perazzo, the City's Acting Director of the Mayor's Office of Data Analytics; and Donald Sunderland, Deputy Commissioner for Data Management and Integration at the Department of Information Technology and Telecommunications, all of whom will be available to answer questions.

The Mayor's Office of Operations works to make New York City government more effective and efficient. Operations includes the Mayor's Office of Information Privacy and the Mayor's Office of Data Analytics. The office has a key role in leading the City's work on Open Data and privacy protection, each relevant for today's hearing.

The Administration shares the Council's belief in effective data sharing among City entities, and supports data-focused research. To this end, the Administration has implemented various initiatives to help facilitate data access and exchange across City entities, while striking a balance with important legal privacy considerations, as well.

A key example of the Administration's commitment to data sharing is the Citywide Data Integration Initiative, created in 2015 as part of the Administration's ten-year strategic plan, OneNYC, to help strengthen the City's capacity for data integration. Developed and managed by Operations, this initiative provides a privacy compliant, "One City" approach to data, using a centralized technology platform to ensure a more effective and efficient use of City resources. This framework requires an approved scope of work and executed legal project agreement for every multiagency data-sharing project involving identifying information, in which each and every data element or category requested must be authorized by relevant agency privacy officers.

While this is a time-intensive process, this approach helps to advance important cross-agency work, while at the same time ensuring that the City complies with applicable state, federal, and local laws that protect New Yorkers' personally identifying information.

While this initiative is complex, it helps make many key City programs possible, including HOME-STAT and Pre-K for All. We would be happy to provide further information about this initiative and discuss how the Council may participate to help advance its data and research goals.

This Administration is also committed to Open Data, a policy that makes City data available to the public whenever possible. Since 2012, the open data portal has grown to include more than 2,000 data sets, and that number is growing. New York City Open Data is a world-class program with a citywide scope. It is a highly visible, cross-agency program dedicated to transparency and open government, while also encouraging research and analytical best practices. Open Data has been used by both New York City residents and City agencies to conduct research and inform important policy decisions. For example, Open Data includes the City's tree census and information that helps emergency responders formulate the best routes to get to where they need to go. There are many other examples, some of which can be viewed in this year's *Open Data for All* report.

This Administration is deeply committed to protecting the privacy of New Yorkers' personal information and advancing privacy best practices. In furtherance of this commitment, the Mayor's Office of Information Privacy was established by Executive Order in 2018. Protecting the privacy of sensitive, personal information is critical to ensure compliance with applicable laws and regulations and promote residents' trust in their government. This is particularly relevant for vulnerable people who may be harmed if their information is improperly shared. We know the Council is similarly committed to protecting New Yorkers' identifying information, as evident in Local Laws 245 and 247 of 2017, known together as the Identifying Information Law. These laws, which established the Chief Privacy Officer role, restrict the collection and disclosure of identifying information across more than 175 City agencies and offices.

While we share the Council's values around data and privacy, we would like to provide comments on two of the bills on the docket today.

As written, we believe Intro 1094 is not a feasible strategy for efficiently accessing City data for three primary reasons. First, it empowers the Chief Privacy Officer with the sole authority to approve Council employees' access to any information held in the City's central data platform. Authorizing access to City data for research and analytic purposes requires a fact-specific legal review and determination made in collaboration with agency privacy officers. This review is based on the laws and legal privileges protecting the confidentiality of the information. From our experience implementing the Citywide Data Integration Initiative, we believe the approach proposed would not expedite access to data. From a feasibility standpoint, it

is not possible for the Chief Privacy Officer to assess every data request made under this bill within the proposed timeline, nor would it be for any City official or agency to review, within days, every relevant record for the potential application of each confidentiality protection or legal privilege before providing access to City Council members and staff. Secondly, personally identifiable information is heavily governed by many federal and state laws that the City cannot overcome by local law, even if a privacy training course were completed. Lastly, based on our conversations with our partners at DoITT, we understand that a "clean room" is not an industry standard, and would not mitigate the risk of data being misused or removed from City computers. We welcome the opportunity to discuss alternate strategies with the Council for efficiently accessing City data where permitted by law.

We also want to take this opportunity to highlight the value of Open Data, and the richness of what the Open Data Law requires and provides. As mentioned earlier, many agencies and offices currently use Open Data to do extensive internal research, and the tool is useful to both the public and City employees wishing to conduct effective, important research. Under the Open Data Law, any regularly maintained data that appears in a report or can otherwise be made public is either already public, or in the process of being made available on the Open Data Portal. In contrast, DataBridge is a piece of technical architecture, and not ultimately a data source itself. We would therefore encourage a continued conversation about the best way to maximize and fully leverage the information already available through Open Data for the Council's analytic and research purposes.

With regard to Intro 986, Operations similarly understands and agrees with what seems to be the spirit of this bill. Data on Open Data should not only be available, but also reasonably accessible, meaning that it could be used for analysis readily. Most data that is currently in publically available reports is available on the Open Data portal with few exceptions where it is either not feasible, legal, or meaningful. We look forward to discussing this bill further, as well, and hope to work with the Council to find a solution.

Thank you for the opportunity to testify today. As you know, this Administration is dedicated to using research and data to make informed policy decisions that improve the lives of all New Yorkers. We look forward to collaborating with you to find workable strategies and solutions for accomplishing our shared goals. Thank you.

The New York City Department of Records and Information Services
31 Chambers Street, Room 305, New York, NY 10007
Pauline Toole, Commissioner
ptoole@records.nyc.gov; (212) 788-8607

Testimony Department of Records and Information Services
Committee on Technology Hearing
September 17, 2018

Good morning, Chair Koo and members of the Committee on Technology. I am Pauline Toole, the Commissioner of the Department of Records & Information Services (DORIS). DORIS is responsible for preserving and providing access to the historical and contemporary records of City government, ensuring that City records are properly maintained following professional archival and record management practices, and making City government's records available to diverse communities through the Municipal Archives and the Municipal Library.

The Department shares the City Council's goals to increase accessibility and usability of the city's historic records. In fact, the Municipal Archivist has been overseeing the development of an open-source, integrated solution to preserve and provide access to both archival and library records. It will be fully operational in 2020. We are currently storing over 185 TB of digital archival information, both born-digital and newly-digitized. We expect that number to grow exponentially as we continue to acquire born-digital records and as we digitize historical records in various formats. This solution will ensure the preservation of historical records over the long-term and provide access to that material to the public.

Digitization efforts in the past year have included nine million historical vital records, executive orders, liquor licenses, Borough President photographs, Department of Finance 1940s tax photographs, Almshouse records, Bodies in Transit records, and more. Our online gallery hosts over 1.1 million photographs and records that are freely available to the public from anywhere. The end goal is to make the library and archival records available online, world-wide.

Intro 1098 by Council Member Kallos would require archivists to conduct a search through 246,000 cubic feet and 185 TB of historical records —correspondence, maps, drawings, building plans,

photos, genealogical records, film, etc. -- to locate information in a non-narrative form, assess the value of putting that information into another format and include that newly-created document on the Open Data Portal. The volume of hard copy records is enormous—the equivalent of three Olympic-size swimming pools filled with boxes of paper. It would require decades of dedicated staff time to implement the proposal. The exercise would yield little of public value.

The value to the public of the archival collections is that they document City government's activities in primary source records. This history can't be tabulated. It's rich and nuanced and requires people to read and draw conclusions and offer the insights they learn from perusing the collections. Requiring the archivists to extract statistical information and create new records removes the information from its original context. This would upend decades of practice-- archivists appraise, preserve, and make available entire collections in an unedited format for research purposes. Creating subsets of data drawn from the archival records is the role of researchers, not archivists.

I and the Department look forward to working with the City Council to further develop solutions to our shared policy goals of increasing the accessibility of City government historical records to diverse populations. Thank you for the opportunity to testify. If you had questions, I would try to answer them.

Testimony to the 2019 New York City Council Technology Committee on Proposed Open Data Legislation

Int. No. 986- format of data in agency reports
LS7987- digitization of historic data
LS6956- oversight access to agency data

September 17, 2018

Good afternoon Chair Koo and members of the New York City Council Technology Committee.

I am Alex Camarda, Senior Policy Advisor for Reinvent Albany. Reinvent Albany advocates for transparency and accountability in State government, and are leading champions for transparency in New York City government, especially strengthening Open Data and the Freedom of Information Law. We were the primary advocates when the City wrote the Open Data Law in 2012 and lobbied for several amendments to the law.

Below are our positions on the bills being heard today.

Int. No. 986 (Councilmember Koo)
Format of Data in Agency Reports

Summary of the bill
This bill would make datasets embedded in final versions of agency reports, studies, audits, audit reports or evaluations available to the City Council when the datasets are not otherwise made available through the City's Open Data portal established by Local Law 11 of 2012.

Reinvent Albany strongly agrees with the intent of this bill, and we strongly recommend amendments.
We have long advocated for datasets embedded in final versions of agency reports, studies, audits, audit reports or evaluations be made available to the public as open data. However, we think these datasets should be defined as "public data" in the Open Data Law and made

1

available to the public through the Open Data portal. This bill only makes these datasets embedded in reports to Council available to the Council. The general public would not be able to access these datasets as Open Data under this bill.

We believe this bill should be changed so that the Open Data Law (Title 23, Chapter 5 of the City's Administrative Code) is amended to ensure datasets embedded in agency reports, studies, audits, audit reports or evaluations are made available to the public.
We think the definition of "data" in 23-501(b) of the City's Administrative Code should be amended as follows:

> "Data" means final versions of statistical or factual information (1) in alphanumeric form reflected in a list, table, graph, chart or other non-narrative form, that can be digitally transmitted or processed; and (2) regularly created or maintained by or on behalf of and owned by an agency that records a measurement, transaction, or determination related to the mission of an agency[.] or embedded or integrated in a final report, study, final audit, audit report or evaluation pursuant to section 1134 of Chapter 49 of the New York City Charter. Such term shall not include information provided to an agency by other governmental entities, nor shall it include image files, such as designs, drawings, maps, photos, or scanned copies of original documents, provided that it shall include statistical or factual information about such image files and shall include geographic information system data. Nothing in this chapter shall be deemed to prohibit an agency from voluntarily disclosing information not otherwise defined as "data" in this subdivision, nor shall it be deemed to prohibit an agency from making such voluntarily disclosed information accessible through the single webportal established pursuant to section 23-502.

LS7987 (Kallos)
Digitization of Historic Data

Summary of Bill
This bill would require the Department of Records and Information Services (DORIS) to go through its trove of historical records to identify tabular data that is of substantial public value and warrants placement in the City's Open Data portal. The bill dictates four criteria by which DORIS would determine if the dataset is of public value. If the dataset has public value, the dataset has to be converted to a digital format allowing for automated processing and made available in the portal.

DORIS must go through its entire inventory with outside historic, cultural, and academic institutions and make datasets with a public value available in the Open Data portal by July 2021, roughly 2½ years from now. If certain datasets cannot practically or technically be placed in the portal, DORIS must provide a listing of these datasets to the City Council, the

obstacles faced in placing the datasets in the portal, and the date it will be made available by. After July 2021, DORIS will appraise new historic tabular data within one year of receipt for placement in the portal. DORIS also has the option of identifying a vendor who can digitize its records, make them searchable and extract tabular data for placement in the portal. DORIS must report on these efforts to identify a vendor by July 2019.

<u>Reinvent Albany supports the intent of this bill but suggests amendments.</u>
We applaud Councilmember Kallos' many efforts to make government more open and accessible to the public. We are concerned, however, by the potential burden on the Department of Records and Information Services (DORIS), which is a very small agency. We also have questions about whether the investment of public funds would be worth the public benefit, compared to other investments in opening current data.

Our experience with city agencies and the Open Data Law has revealed that it is a large undertaking for an agency to do a comprehensive inventory of public data, even with city officials in charge of managing agency datasets currently being used. We think compiling a comprehensive inventory of historical datasets would be a big challenge. Instead we suggest that DORIS identify the datasets of greatest public interest based on the criteria in this bill which includes public requests. DORIS should report those datasets to the Mayor's Office of Data Analytics which can include the information in the Open Data agency compliance plan pursuant to section 23-506(c) of the City's Administrative Code. This approach would require DORIS to include high value datasets in the Open Data portal but not require a full or comprehensive review of its inventory. Datasets would be made available over time depending on public interest and usage.

Reinvent Albany also supports the provisions in this bill requiring DORIS to identify a vendor to digitize its collection of historical documents, make the collection searchable, and to identify tabular datasets to place in the Open Data portal (subsection d and section 3 of the bill). When it digitizes historical records, DORIS should be converting historical tabular data from paper to open data - not to pdf image files which are unusable. We support a budget allocation for DORIS for this purpose.

LS6956 (Johnson)
Oversight access to agency data

<u>Summary of Bill</u>
This bill would enable City Council members and staff who have completed training on privacy laws to access tabular and narrative digital data housed in city agencies that is approved for review by the city's Chief Privacy Officer, who would remove personally identifying information or information prohibited from disclosure under state or federal law.

The bill establishes at least one "data clean room", a physical location where Councilmember or staff could digitally review and reconfigure the datasets without being able to print or transmit them. Councilmembers and staff would be able to access the "data clean room" during business hours by submitting a request in advance and signing a non-disclosure agreement prohibiting the disclosure of data to a third party unless authorized to do so. Councilmembers and staff would not be able to leave the "data clean room" with a data product without authorization to do so.

For data which is integrated across multiple agencies in Databridge, or another similar infrastructure run by the Mayor's Office of Operations or another mayoral city agency, the Department of Information Technology and Telecommunications (DoITT) would provide an electronic key for City Councilmembers and staff to access the data through a web interface, and software for the Council could run queries on the data.

<u>Reinvent Albany supports the intent of this bill but suggests changes.</u>
An important charter-mandated responsibility of the City Council is oversight of mayoral agencies. Unlike the state legislature, the Council exercises this authority fairly robustly, and this bill is a necessary extension of those powers. While the City Council has a data team, it does not have access to mayoral agency data without making a request or issuing a subpoena. Consequently, data sharing is at the will of city agencies and typically involves ad hoc Council requests, and time-consuming back-and-forth communications between the Council and city agencies. There is an imbalance in this relationship even when the Council and a particular agency have collegial relations because the agency controls access to whether the Council gets the data and how it is configured.

This bill would enable the Council to access the raw data of city agencies after it has been scrubbed of personal identifying information and other information protected from disclosure by federal and state law. Councilmembers and staff could review this data and configure new data products with the approval of the DoITT, and potentially share it with third parties. The Council would not have to rely on city agencies to make the data available to them, and staff at both the Council and in city agencies would not have to waste time sending communications back and forth regarding data requests.

It does not seem establishing a physical "clean room" is the best way to set up a structure for the Council to review and work with agency datasets. Remote access through a secure web portal that restricts downloading, printing and sharing seems preferable if doable. This would also be more accessible and less costly. We support the Council being able to access data so its oversight is evidence based and serves as a more meaningful and informed check on the mayoralty. We ask Council to amend this bill based on conversations with MODA and DoITT that identify the most practical way to achieve its goals.

To: NYC Council - Committee on Technology
From: Noel Hidalgo, Executive Director of BetaNYC

Re: Intro 1094-2018, Intro 0986-2018, Intro 1098-2018

Monday, 17 September 2018

General Concerns

In general, I'm concerned that the Mayor's Office of Data Analytics is still missing a Chief Analytics Officer and we are still missing a Chief Technology Officer. Important bills like this should have someone to implement them. More importantly, I'm concerned that both programs will be underfunded through the next budget cycle.

Intro 1094-2018 - DataBridge clean room access

Why is this bill needed? From the text of this bill, it appears that City Council is locked out of DataBridge. If that is the case, it appears this is a failure of leadership. If the City had appointed a Chief Analytics Officer, this bill appears to be a reasonable request.

Why does the Council have to legislate access to DataBridge?

DOITT should have all of the appropriate resources to make this requests. If not, already have a clean room in place.

While we support the bill, I'm a bit shocked that legal resources have to be spent on such a request.

Intro 0986-2018 - Data in Agency Reports

We are very supportive of this bill and have a few questions to be considered.

- What about adding a requirement for agencies publishing data on their website or in other forms to indicate which section of the charter or law requires the publication of a report or study? This way residents could better evaluate whether the report or study was meeting the intent of the charter or law.

- What about adding a requirement to disclose the system or systems of record that were used to generate the report or study (and maybe even each specific list, table, graph, chart), and the name of the division in the agency responsible for maintaining the system of records disclosed?
- Why not ask for these reports and data to be published to the City's open data portal?

Intro 1098-2018 - Digitization of Historical Data

In general, very supportive of this bill.

Over the summer, we've researched how community boards are using technology and discovered their desire to digitized archived agendas and permit stipulations. For example, our city's sidewalk cafes and liquor licenses have metadata, aka stipulations, that are not structured data. These stipulations exist as notarized agreements between a community board and a licensee.

This creates an information blind spot. Stipulations are valuable to the understanding of *what happens for what reason*. I hope that this bill gives community boards a framework and the financial resources to digitize their archived agendas, meeting notes, and discretionary action permit stipulations.

In regards to the language of the bill, we have a few questions:
- How is "public value" determined?
- How can community groups or community institutions be consulted? Are they cultural institutions?
- What would be the methodology for selecting or identifying "public value" — will this method be open for review and feedback?
- At end of this process, can the files exist in a non-proprietary digital format? Currently, the bill says outputs should be in a "digital format."

Thank you,
Noel Hidalgo
noel@beta.nyc

Yale Fox, CEO
Rentlogic
335 Madison Avenue (4th Floor)
New York, NY 10017

To Councilmen Peter Koo, Robert Holden, Eric A. Ulrich, Brad Lander, and Kalman Yeger:

My name is Yale Fox. I'm a TED Fellow and the CEO of Rentlogic, a tech-powered standards association that grades every apartment building in New York City as A, B, C or F based on health and safety standards – similar to how the City grades restaurants. Our software uses data from HPD, DOB, and ECB to evaluate how well a building complies with the City's Warranty of Habitability. We focus on code compliance and violations, not whether a building is considered "luxury" or not, nor do we accept reviews from tenants (like a user-generated rating site would).

The greatest use of our platform is that it distills buildings' histories into an easy-to-use public interface accessible to anyone. It helps keep renters from moving into bad buildings, gives recognition to good landlords, and makes it easier for cities to understand their housing stock and code enforcement needs.

Today, approximately one in eight New Yorkers use Rentlogic when searching for new apartments. This is changing the market because renters are beginning to seek A-rated buildings over ones with histories of bad management or code issues. It is worth noting that our data shows that most landlords are actually pretty good, but a few bad actors ruin it for the community, the City, and frankly, for the reputation of the industry as a whole.

As previously mentioned, the data our algorithms use comes primarily from HPD, DOB, ECB. Our work would not be possible without open data initiatives because of how the City tracks violations like persistent mold, bedbugs, heat/hot water problems. These same data sets are probably used by tens of thousands of companies for completely different reasons.

While the data is good, we believe there is room for improvement. Most people are going to say that it's not coded – meaning someone is writing in "BED BUGS" where it should be code 0103 – BEDBUGS. This is because there are 10 different ways of spelling bedbugs.

One problem we see with the open data, is how it's being collected in the first place. With garbage in, you get garbage out. In our platform, if a property owner has a low rating due to having many violations, we can send a third-party, state-licensed building inspector to conduct an inspection to make sure the violations have been cleared. We built an app that goes on inspectors' phones to assist with inspecting the building. I don't understand why the City doesn't do something like this. It will make sure that the information collected is more than

just data; there can be media attached to it. It will also force it to be standardized which will fix a lot of the misspellings.

While something like that may potentially work for today and moving forward, what about all the data that's been collected? Every startup that wants to work with City data has to put a ton of tedious and expensive work into cleaning up everything that's already on there. For us, it took us about a year to get the data to be somewhat usable.

I think the City should clean up the existing data and there's an easy way to do it: work with BigApps, beta.nyc or a similar type of organization and have a competition. It doesn't have to be for a lot of money; people would be excited to work on this problem. In addition, the thousands of apps that are out there can more or less improve overnight. Lastly, New York City would be recognized worldwide by the Open Data Community which could possibly inspire them to do similar things.

In conclusion, we need the right data to make the right decisions. The hard part for most of that is actually already done, but if you were to clean it at the source it would have an immediate positive effect.
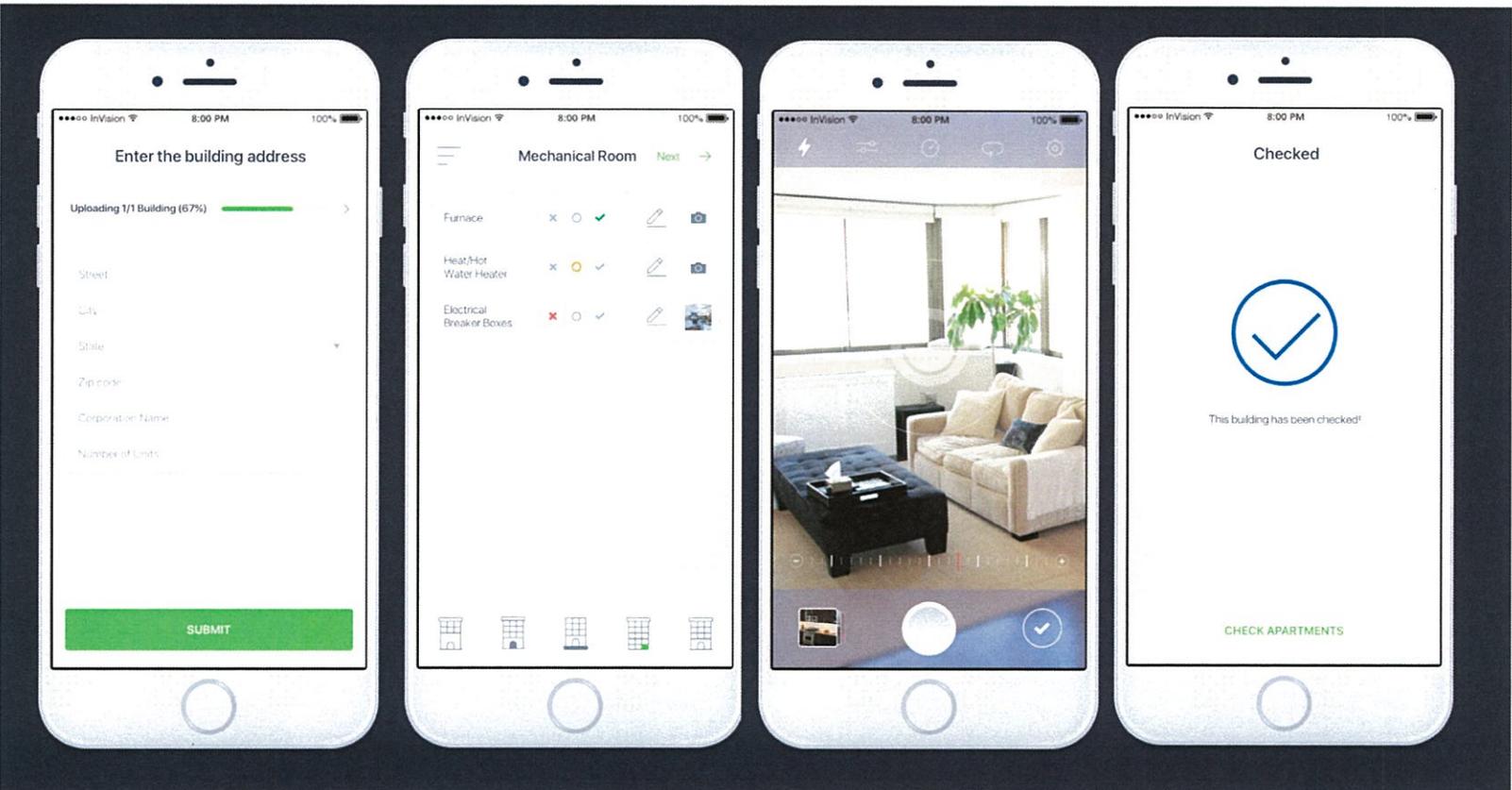
Best,

Yale Fox | CEO
Rentlogic
TED Fellow and Kairos Fellow

PUBLIC UTILITY LAW PROJECT OF NY

Testimony
Of the Public Utility Law Project of New York
Before the New York City Committee on Technology
Hearing Concerning Three Proposed Local Laws
Sept. 17, 2018

Good Morning, Chairman Koo and Members of the Committee on Technology; thank you for inviting us to comment on proposed laws 1094-2018, a measure introduced by Speaker Johnson to enhance the Council's oversight ability; 0986-2018, Chairman Koo and CM Holden's measure to increase accessibility of City agency–generated data; and 1098-2018, CM Kallos's bill to digitize the City's historical data.

My name is Rachel Burd; I am the Associate Director of the Public Utility Law Project of New York. I am standing in for our Executive Director, Richard Berkley, who was unfortunately unable to attend.

The Utility Project, often called PULP, is, as you in know, a 37-year-old nonprofit public interest law firm, policy, and advocacy organization. Our mission is to advocate, educate, and litigate on behalf of New York's low-, middle-, and fixed-income utility consumers.

Our work includes protecting New Yorkers—your constituents—who have rights as utility consumers+ that most have little knowledge of; advocating in key venues to lower or reverse rate increases; and fighting the anticonsumer behavior of exploitive entities such as retail energy service companies (ESCOs) that overcharge, deceive, and illegally change consumers' accounts. With the Speaker and Members' support, we have been able to bring this assistance directly to New Yorkers.

We also appreciate the relationships we've developed concerning critical federal actions that will undermine vital programs serving the City's vulnerable households, such as the Trump Administration's attacks on the Lifeline program and attempts to eviscerate the Home Energy Assistance Program.

Today we are here to discuss important Council concerns about the collection, creation, and handling of data by Mayoral agencies—and Council access to it; the standardization of the formats of such data; and the digitization of the historic records containing such data,

Data is a key tool PULP uses in our work. From analyzing the data offered by utilities to attempt to justify rate increases to determining where in the City consumers facing shutoffs, termination notices, and deferred payment agreements are concentrated, data helps PULP determine not only the areas of

greatest need but also locations where the utilities may be circumventing consumer rights. PULP has successfully pressed to make some of this State-collected information publicly available, thereby avoiding lengthy FOIL proceedings. We are now diving into New York City's water utility—the Water Board. Last spring, using the City's Open Data Portal, we were able to determine not only how many New Yorkers were in danger of having liens on their water bills put up for sale, but also in which boroughs they were concentrated.

The Speaker's bill is designed to improve access to agency data—enhancing the Council's ability to provide oversight—while simultaneously protecting the confidentiality of personally identifiable information (PII) through a new method, and safeguards, for access to such records.

PULP supports the principle of broadening access to agency records while protecting the confidentiality of those New Yorkers to which such records refer. In the public utility field, protection of the PII of consumers is strongly required by both State and Federal law. It is consistent with such safeguards, therefore, for the Speaker's bill to similarly take steps to protect PII while allowing the underlying data to be scrutinized as part of the Council's legislative oversight.

PULP's experience in this area underscores its value. In 2014 PULP released an analysis of 2 years' worth of complaint data on energy service companies (ESCOs): 10,000 complaints obtained only with intensive work under the state's Freedom of Information Law provided clear documentation of their targeting of seniors, low-income people, and speakers for whom English was not their first language—for deception. The potential for similar data to be available under the Speaker's, Chair Koo and Council Member Holden's, and Council Member Kallos's proposals offers a welcome opportunity.

The Speaker's bill is also critically important in assisting the Council in fully explicating Agencies' budgets when making its decisions during budget consideration. Certainly in 2018, Council Members repeatedly requested details of programs, asking Agencies to be more transparent in their submitted budgets.

For example, when something called a "one-shot" was referred to during one hearing, it was discussed solely in terms of rental assistance. While that program is critically important to New Yorkers, "one shots" also refer to a state-required utility assistance program, under Public Service Law 131-s, that provides an essential safety net for New York's low-income utility consumers. New York City is appropriately responsive to consumers in need of these

90 South Swan Street—4th Floor
Albany, NY 12210
Email: info@utilityproject.org

Phone: (877) 669-2572
Fax: 518-286-2302
Website: www.utilityproject.org

funds—often the difference between warmth and light and cold and dark.

PULP believes that more rigorous and aggressive pursuit of utility practices would save the City significant funding in this program: i.e., better enrollment in the utilities' low-income discount programs would diminish the City's need to provide supplemental funding. How much, however, is not evident given the absence of such detail in the budget.

In addition, New York City has a tremendous resource in DORIS, the Department of Records and Information Services. This unsung agency is vital to preserving the historical and contemporary records of New York's government and the innumerable bits of data it creates when it touches the lives of the millions of current and former New Yorkers

Most important, thanks to Local Law 30 of 2017 and Executive Order 120 of 2008, and DORIS's language action plan, DORIS provides access to the City's vital records to all New Yorkers regardless of the language they speak

The legislation that is the subject of today's hearing is both a logical outgrowth of DORIS's historic mission and the leadership shown by the Council in 2017, and an important buttress against a time like now, when inconvenient facts from New York City's past and present are labeled "fake

news" so that they might be replaced by misrepresentation and dangerous dogma.

Consequently, two of the three bills being considered today—Chairman Koo and Council Member Holden's bill to standardize the format of data in agency reports and Council Member Kallos's bill concerning digitization of historic data—assume additional importance beyond their promotion of transparency and accountability. They continue the process begun in Mayoral Directive 2015-3, which superseded Directive 92-3.

While the Public Utility Law Project of New York does not often comment on specific NYC ordinances or local laws, we believe that a process that continues New York City's broadening and easing of access to vital public records is valuable to the City's residents generally, and specifically for the vulnerable households that are the focus of our mission.

In particular, we believe that New York City's Open Data portal is a worthy and forward-looking experiment, and it appears that these three bills are consistent with its spirit and the City's varied open data initiatives. Making that data clear, per Chairman Koo and Council Member Holden's proposal, and in formats available to New Yorkers who struggle with technology, is a welcome addition to the challenge the City has taken on with the Portal.

90 South Swan Street—4th Floor   Phone: (877) 669-2572
Albany, NY 12210   Fax: 518-286-2302
Email: info@utilityproject.org   Website: www.utilityproject.org

In addition, I wish to note that we look forward to having the opportunity to return and discuss cable-broadband issues at more length with this Committee, and the Council generally, because the City of New York, and particularly this Council and this Mayor, are strongly supportive of protecting the voice of all of New York City's residents and our incredibly strong and valuable history of immigration.
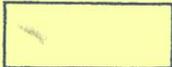
And thus we must all work together to protect and encourages those voices on the Internet through Net Neutrality and such other actions as will give voice to the voiceless and vulnerable.

Thank you for the opportunity to speak on these three bills.

###

THE COUNCIL
THE CITY OF NEW YORK

| *Appearance Card* | |

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition
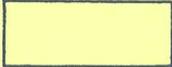
Date: 17 SEPT 2018

(PLEASE PRINT)

Name: NOEL HIDALGO

Address: 65 DRIGGS, BKLYN

I represent: BETA NYC

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

| *Appearance Card* | |

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____
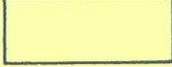
(PLEASE PRINT)

Name: Paul de unToole

Address: Mayor's office

I represent: Commissioner of DORIS

Address: _____

THE COUNCIL
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: Emily Newman

Address: _____

I represent: Mayor's office of Operations

Address: _____

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. 3 bills   Res. No. _____
☑ in favor   ☐ in opposition

Date: 9/17/18

(PLEASE PRINT)

Name: Alex Camarda

Address: _____

I represent: Reinvent Albany

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____   Res. No. _____
☐ in favor   ☐ in opposition

Date: 6 9/17/18

(PLEASE PRINT)

Name: RACHEL BURD

Address: 25 BWAY - 9th FL

I represent: PULP

Address: 25 BWAY

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____   Res. No. _____
☐ in favor   ☐ in opposition

Date: 9/17/2018

(PLEASE PRINT)

Name: YALE FOX

Address: 335 MADISON AVE - 4th Floor

I represent: RENTLOGIC

Address: 335 MADISON AVE - 4th FL

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