

I'm here today to express my opposition to the changes to Rule 1.06 of the loft law. The proposed changes will unfairly place greater burdens on tenants seeking coverage under the loft law. By making tenants responsible for serving copies of their application to all affected parties, the loft board is simply making it more difficult for tenants to apply for coverage. I see this as a growing trend at the loft board. I strongly urge the members of the board to reverse this trend.

Ted Partin

Tenant

360 Jefferson Street

June 5, 2011

Written Comments - Sec. 1.06 of Title 29 of RCNY

My name is Rachel Fuentes, I am a Loft Tenant Organizer with the East Williamsburg / Bushwick Loft Tenants Association. We oppose the proposed amendment to Sec. 1.06 of Title 29 of the RCNY.

As Loft Tenant organizers, we encourage and assist Loft Tenants to complete and submit coverage applications to the Board. Our objections to the proposed amendment primarily concerns the filing of coverage applications with the Board and we urge the Board to consider excluding coverage applications from the new service requirements

The proposed amendment shifts the burden of service of affected parties from the Loft Board to the applicant. In further complicating an already daunting process for tenants without providing either instruction or guidance to tenants, the proposed amendments will further discourage tenants from applying and engaging with what is already an arcane process in an obscure piece of the Department of Buildings

If the Loft Board passes this rule as written, we urge them to provide for tenants clear instructions and readily accessible assistance with completing the requirements of the application. ~~It~~,

Many potential applicants may already be familiar with the current rules regarding filing of Loft Board applications. We further urge that the Loft Board create a clear and readable description and summary of the changes to the application to be disseminated at location and ^{through} media that will likely reach potential loft law applicants.

The Loft Board should realize that in removing itself from the early stages of the loft law coverage process, it is giving up one of its crucial early points of contact with tenants in potential IMDs. We urge the Loft Board to consider notifying or otherwise communicating with affected parties outside of the service process and to find and increase other points of contact with potential IMD buildings.

Finally, we support the Board's proposed requirement that an instruction sheet for answering an application be served with an application. We urge the Loft Board to consider replicating this

requirement to provide an informational / instructional sheet to be served with all Loft Board forms, including and especially building registration forms

Sincerely,
RACHEL Fuentes
LEAD ORGANIZER
EAST WILLIAMSBURG / Bushwick
Loft Tenants Association
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Dear Members and Officials of the New York City Loft Board,

Thank you for the opportunity to speak before you today.

My name is Viktoriya Kravets; I am a tenant organizer with the East Williamsburg/Bushwick Loft Tenants Association. We oppose changes to amend section 1-06 of Title 29 of the Rules of the City of New York in regards to Applications to the Loft Board. By shifting the burden of service for applications onto the applicants, these changes will unfortunately make it more difficult and expensive for tenants to submit coverage applications. The price of the application will now become substantially higher.

This newly proposed application process shifts the burden of proof onto the tenants who are already nervous and hesitant about applying. It is often that that initial mail from the loft board that early on in the process that adds to the legitimacy and urgency of the loft law for tenants. Receiving a letter addressed from the loft board is often the catalyst that moves tenants to educate and protect themselves. It is doubtful that receiving a letter from an unknown neighbor to a joint mailbox will have the very same effect.

Very often loft tenants are hesitant to put in a coverage application because they fear they will be held up in very costly litigation for many years. These changes to the application will make the tenant's first exposure to the loft law even more complicated and more legalistic. This will likely put off many tenants who worry about their immediate need to retain council. Many tenants are not financially able to retain an attorney for themselves and often it has taken much time for many tenants to finally apply together in groups, a luxury not always afforded to those who very desperately need loft law to remain in the homes.



Sincerely,

Handwritten signature of Viktoriya Kravets in cursive script.

Viktoriya Kravets
Loft Tenant Organizer
East Williamsburgh/Bushwick Loft Tenants Association



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New York City Loft Board
100 Gold Street
2nd Floor
New York, NY 10038

Public Hearing: Proposed Rule changes to Section 1-06 of the Loft Board Rules, which relate to applications.

June 2, 2011
22 Reade St
1st Floor
New York, NY 10007

Thank you for the opportunity to comment on the New York City Loft Board's intention to amend section 1-06 of Title 29 of the Rule of the City of New York relating to applications. On behalf of the DUMBO Neighborhood Alliance (DNA), I strongly disagree with the proposed change regarding the tenant being responsible for serving copies of their application to all affected parties.

The notification of and copy of the tenant's coverage application should remain the responsibility of the Loft Board. In larger buildings, why would it be appropriate for tenants to determine residency of the other lofts in their buildings? In my over 20 years of experience working with loft tenants and their issues, know that residents have significant issues with their privacy because they are living in non conforming use. There already is a tremendous burden of responsibility on tenants. While the Loft Board should be simplifying the process, this step will further complicate, and delay the process. Both tenants and landlords will pay more respectful attention to a notice coming from the New York City Loft Board. Please reconsider this part of the amendment.

There needs to be greater advocacy and awareness about the new Loft Law and the process. There must be outreach throughout the Boroughs by all City Council members, not just the diligent few, and community boards. There may be thousands of tenants falling through the cracks because they are unaware of the new law.

Respectfully submitted,


Doreen Gallo, Executive Director

- Rule 1.06 changes proposed by the loft board places undo burden on tenants by placing upon them the responsibility for serving copies of their application to affected parties \rightarrow only by mail.

- This increases the administrative burden of on tenants by adding the expense of mailing as well as ~~post~~ proof of mailing (at least £1.59 per application) to the £25 already charged per unit coverage application fee. My ~~the~~ building has 40 residential units, adding at least £63 in administrative costs. There are plenty of lofts w/ large numbers of units and ~~thus~~ the changes to rule 1.06 can be not only a deterrent to filing but also an unnecessary dilemma to include all possible affected parties. This rule simply adds to the costs that tenants already has to pay for access to their loft rights and will add to an already complicated process.

- There is also a lot of confusion amongst my fellow loft tenants w/ regards to the process of filing and application. I ask that the loft board provide better and more ~~an~~ easily accessible guidance on how to fill out and serve all necessary applications.

\rightarrow This merely shifts responsibility from the loft board to tenants. I still why the loft board feels that this is appropriate.

which will ~~complicate~~ complicate the process