

NEW YORK CITY  
DEPARTMENT OF CONSUMER AND WORKER PROTECTION

DCWP RULES HEARING - NEWSSTAND LICENSES

VIRTUAL PUBLIC HEARING

REMOTE - VIA TELECONFERENCE

April 29, 2024

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1 MS. KARLINE JUNG: Oops. I just realized  
2 that the recording did not start yet, so I will start  
3 over. Good morning. My name is Karline Jung. I have  
4 been designated as the Hearing Officer for the public  
5 hearing of the Department of Consumer and Worker  
6 Protection on the proposed rules to add rules to  
7 implement Local Law 128 of 2021, allowing businesses  
8 to hold newsstand licenses.

9 This hearing is being held via  
10 teleconference call. It is now 11:02 a.m. on Monday,  
11 April 29, 2024, and I am hereby convening the public  
12 hearing on this proposed rule.

13 The proposed rule was published in The City  
14 Record on March 28, 2024. The published notice and  
15 rules are available online on the New York City Rules  
16 website and the Department's website. The Department  
17 has proposed rules pursuant to the authority vested in  
18 the Commissioner of Department of the Consumer and  
19 Worker Protection by sections 1043 and 2- 2203(f) and  
20 2203(h) (1) of the New York City Charter, and section  
21 20-104 the New York City Administrative Code.

22 This hearing affords the public the  
23 opportunity to comment on all aspects of the rule the  
24 Department has proposed. The Department will  
25 carefully review all testimony and written comments

1 received at this hearing and will give due weight and  
2 consideration to proposals and recommendations that  
3 are submitted for the record at this hearing.

4 To ensure that everyone seeking to testify  
5 today will have an opportunity to do so, I ask that we  
6 all follow these ground rules. During the hearing,  
7 all participants should give due respect and  
8 consideration to the folks offering their testimony,  
9 and please mute your lines if you're not speaking.  
10 Each witness will have a maximum of three minutes to  
11 provide oral testimony. If your comments take longer  
12 than three minutes, please synthesize your oral  
13 testimony and leave a written copy for the record.

14 Unlike the limit on the time for oral  
15 testimony, there is no limit on the number of pages  
16 you can submit as written testimony or as documents  
17 for the record. The written submission will be made  
18 part of the public record.

19 If you are looking to testify today and you  
20 have not yet let me know, please do so now in the  
21 chat. I'll give everyone a few minutes. For those  
22 that just joined, if you're looking to testify today,  
23 please let me know in the chat. Okay. Seeing no one  
24 present to offer testimony, I will adjourn the hearing  
25 until an individual appears to offer testimony.

1 MR. MAX BOOKMAN: Wait, wait, wait, wait.

2 We had let you know. I e-mailed you.

3 MS. JUNG: Oh, did, did you? Okay.

4 MR. BOOKMAN: Yeah. So I, I had e-mailed  
5 you previously. Do you want, did you want me to just  
6 put it in the chat, as well?

7 MS. JUNG: Okay. My apologies. I thought  
8 you had just provided comments. You can provide  
9 testimony right now, if you'd like.

10 MR. BOOKMAN: Thank you. Yeah, in my e-mail

11 --

12 MS. JUNG: You will have three --

13 MR. BOOKMAN: -- I had said I'd be speaking  
14 orally. But, yeah, thank, thank you for that. Can I  
15 begin?

16 MS. JUNG: Yeah.

17 MR. BOOKMAN: Thank you. My name is Max  
18 Bookman. I am counsel to the New York City Newsstand  
19 Operators Association, the retail trade association  
20 for sidewalk newsstands that's been in existence since  
21 1988. We submitted written testimony, and thank you  
22 for this opportunity to speak today.

23 The challenges facing the sidewalk newsstand  
24 industry are not unique to the sidewalk newsstand  
25 industry. It's what's facing all retail business --

1 the hybrid work environment, online retail, retail  
2 theft. Sidewalk newsstands are particularly  
3 susceptible to these challenges.

4 The Department has -- some, some of the,  
5 the, the ways that the Department could address this  
6 are out of its hands through statutory solutions,  
7 which we address in our comments. But the Department  
8 does have some regulatory power and we believe, by and  
9 large, that these rules make the sidewalk newsstand  
10 situation worse, and not better. I don't have time in  
11 three minutes to address all of the changes that we  
12 ask you to make in the regulations, so I will just  
13 address three.

14 First, and most importantly, is that the  
15 Department should not be enacting regulations that  
16 threaten to put existing sidewalk newsstands out of  
17 business. And you do that twice in your proposed  
18 regulations, one in the pedestrian plaza regulations  
19 and another in the, in the franchisee construction  
20 proposal.

21 The pedestrian plaza regulations are, by and  
22 large, retroactive, as currently drafted, which means  
23 that a sidewalk newsstand that is currently in a  
24 pedestrian plaza is threatened to being put out of  
25 business or having to be re- relocated, potentially

1 relocated to a place that's, that's not acceptable.  
2 That is not acceptable. The, the Department should  
3 not be having retroactive regulations for the  
4 pedestrian plazas. There's a lot of work done on the  
5 distinction between pre-1991 and post-1991 newsstands  
6 in the regulations. The reason why that exists,  
7 distinction even exists is because the last time you  
8 did rulemaking on this in 1991, you exempted new  
9 newsstands built after 1991 from the regulations you  
10 were doing at that time. So you previously understood  
11 that, that new regs shouldn't be made retroactive to  
12 threaten sidewalk newsstands from being put out of  
13 business.

14 In addition, the, your [unintelligible]  
15 [00:06:00] franchisee construction regulations allow  
16 the franchisee to basically put an existing sidewalk  
17 newsstand out of business on its own say so. That  
18 can't, that, that really can't be.

19 And, secondly, the vacancy rules that you  
20 have in place are, are ones that we do applaud. We  
21 hope those stay in the final rules. The vacancy rules  
22 are important, especially in the context of the  
23 broader rules, because the broader rules, by and  
24 large, pretty much just make it harder to op-, to  
25 construct and open a new sidewalk newsstand in New

1 York City. So, having an opportunity to get into an  
2 existing vacant newsstand, like the vacancy rules, is  
3 really important.

4 Third, and finally, we ask that you give  
5 some consideration to the ongoing retail theft issues  
6 facing sidewalk newsstands. And we put, put a  
7 proposal in our, our, our written commentary asking  
8 for you to allow for some common sa- se-, common sense  
9 safety measures approved by the NYPD to, to be  
10 installed into sidewalk newsstands without threatening  
11 one of our members with a violation for altering the  
12 newsstand.

13 So, with, with those comments in mind, we  
14 ask that you please carefully review our written  
15 testimony and, and incorporate it into the final  
16 regulations. Thank you.

17 MS. JUNG: Great. Thank you. If there is  
18 anyone else who would like to testify today, please  
19 let me know now.

20 MS. ANDREA TAN: Hello. My name is Andrea  
21 Tan with Volunteers of Legal Service, and I would like  
22 to make a brief comment.

23 MS. JUNG: Okay, that's great. You will  
24 have three minutes for testimony, and you may begin  
25 whenever you're ready.



1 MS. TAN: Okay, thank you. My name is  
2 Andrea Tan. I am an attorney with Volunteers of Legal  
3 Service. We are a nonprofit legal services provider.  
4 We represent entrepreneurs and small businesses across  
5 New York City by providing transactional legal  
6 services pro bono.

7 We recognize that operating a newsstand is a  
8 form of entrepreneurship that provides many New  
9 Yorkers, particularly immigrant, minorities and  
10 veterans, with crucial economic opportunities. And  
11 newsstand operators foster connection with our  
12 communities and serve as our eyes on the street. We  
13 believe the proposed rules to prohibit newsstand  
14 licensees from renting the newsstands and to require  
15 licensees to derive most of their income, excluding  
16 investment income from the operation of up to two  
17 newsstands, would benefit small entrepreneurs and the  
18 community.

19 We also believe that the proposed rules to  
20 allow business entities to hold newsstand licenses  
21 enables newsstand operators to benefit from the  
22 limited liability protection and other advantages of  
23 having a business structure.

24 In our experience, individuals that operate  
25 newsstands often aren't the same individuals holding

1 the newsstand licenses. Their existing formal  
2 arrangements in the newsstand system where individuals  
3 pay rent to newsstand licensees for the right to  
4 operate the newsstand as sub-licensees, these  
5 licensees may serve as the name on the license, but  
6 they do nothing more to operate the newsstand. The  
7 sub-licensees are the ones who control and purch-,  
8 and, and the purchasing, the pricing, make the pricing  
9 decisions of the newsstands, and they assume the  
10 business risk. They may also pay licensees' license  
11 renewal costs, et cetera. You know, in some cases,  
12 sub-licensees have secured their positions in these  
13 arrangements by paying significant amounts of money.  
14 So, while far from the system envisioned by the City,  
15 it is the reality for many newsstand operators, and  
16 these sub-licensees should have a pathway to assuming  
17 the newsstand license in the event of vacancy or  
18 abandonment by the license holder.

19 So, to that end, we encourage DCWP to  
20 consider the following amendments to the proposed  
21 rules to provide a pathway for those who have long  
22 operated and worked in newsstands to formally become  
23 licensees. We have three recommendations.

24 So the first one would be the categories of  
25 eligible applicants who may apply to operate an

1 existing newsstand upon the death or permanent  
2 disability of a newsstand licensee should be expanded  
3 to include an individual who was the principal person  
4 operating and working in such newsstand up until the  
5 time of the licensee's death or disability.

6 The next recommendation is that the  
7 categories of eligible applicants who may apply to  
8 operate an existing vacant newsstand should be  
9 expanded to include an individual who was the  
10 principal person operating and working the newsstand  
11 prior to the vacancy.

12 And the last recommendation is that section  
13 2-64(c)(1) grant DCWP permission to revoke or refuse  
14 to renew a license for failure to operate a newsstand  
15 for two consecutive months, that should be revised to  
16 include an exception for licensees who are complying  
17 with any kind of suspension of their license, because  
18 sometimes, because they're trying to comply with that  
19 suspension, they can't operate for the two months and  
20 they need to be given the time to be able to resolve  
21 that issue and not be shut down.

22 So we appreciate DCWP's attention to the  
23 needs of New York City's newsstand operators who are  
24 among New York's smallest business and, yet, form an  
25 essential part of our community. So thank you again

1 for the opportunity to provide comment on the proposed  
2 rules governing newsstands.

3 MS. JUNG: Thank you for your comments. If  
4 there is anyone else who would like to provide any  
5 comments or would like to testify, please let me know.

6 MR. PATEL: Yes, do you hear me?

7 MS. JUNG: Yes, I hear you.

8 MR. PATEL: Thank you. I, I would like to  
9 provide comments. I'm a newsstand owner. My name is  
10 Patel.

11 MS. JUNG: Okay. You have three minutes for  
12 testimony. You may begin whenever you're ready.

13 MR. PATEL: Thank you. I'm a little  
14 puzzled, just as Mr. Bookman is, about these  
15 retroactive rules. And I would like that, and, and  
16 I've spoken with several of our colleagues who own and  
17 operate newsstands, and they, too, they are most  
18 shocked that these act- retroactive rules would be  
19 applied to, or where the DCWP seeks to apply these  
20 rules retroactively.

21 And I'm grateful to the advocacy of Mr.  
22 Bookman on behalf of hundreds of us newsstand owners  
23 and operators. And I will conclude my comments here.  
24 Thank you.

25 MS. JUNG: Alright, thank you. For those

1           that just joined, if you would like to provide comment  
2           or provide testimony, please let me know.  Alright.  
3           Seeing no one present to offer testimony -- oh, am I  
4           missing someone?

5                         UNIDENTIFIED MALE 1:  Hi.  I am so sorry.  
6           Yes, I actually just joined a little bit late.  I had  
7           an issue trying to connect to the meeting.

8                         MS. JUNG:  Mm-hmm.

9                         IDENTIFIED MALE 1:  Can, if, if it's  
10          possible, are you able to kind of just recap what  
11          happened?  You know, what was discussed in the first  
12          like five or 10 minutes?

13                        MS. JUNG:  Sure.  So I just provided in-  
14          introductory comments that this is a Rules Hearing for  
15          the proposed rules, to add rules to implement Local  
16          Law 128 of 2021, which allows businesses to hold  
17          newsstand licenses, and I just informed everyone that  
18          if they would like to provide testimony or comments,  
19          they have three minutes to do so.

20                        UNIDENTIFIED MALE 1:  But something was  
21          discussed about, I don't know, like the, for the rent  
22          or something, like sublease?  I, I didn't catch that  
23          part, because I joined right after, I think, when it  
24          was being discussed.

25                        MS. JUNG:  You might be referring to

1 testimony that someone else provided.

2 UNIDENTIFIED MALE 1: Okay.

3 MS. JUNG: Alright. If no one else would  
4 like to provide testimony or comments, I will adjourn  
5 this hearing until an individual appears to offer  
6 testimony or until 12:00 p.m., whichever comes first.

7 MR. BOOKMAN: Thank you. And thank you to  
8 all the newsstand operators who came out today.

9 MS. JUNG: Thank you, everyone.

10 UNIDENTIFIED MALE 2: Hi, there.

11 MS. JUNG: Hello. If you'd like to provide  
12 any comments or testimony, please let me know.

13 UNIDENTIFIED MALE 2: Did the meeting start?  
14 I, it took a long time for me to get into the meeting.  
15 Did the meeting start yet?

16 MS. JUNG: Yes, the meeting is in progress  
17 right now.

18 UNIDENTIFIED MALE 2: Okay. How do I get  
19 into the meeting?

20 MS. JUNG: Oh, you are, you are in the  
21 virtual meeting right now.

22 UNIDENTIFIED MALE 2: Oh, there I am. Oh,  
23 wait. I don't know where I am. Okay.

24 MS. JUNG: Would you like to provide any  
25 comments or testimony today?

1 UNIDENTIFIED MALE 2: I just want to here  
2 what's going on. Has anybody said anything?

3 MS. JUNG: Yeah, we've had three people  
4 provide comments.

5 UNIDENTIFIED MALE 2: How do I hear the  
6 comments? I didn't hear anything.

7 MS. JUNG: You might have to wait until the  
8 transcript of the record-, of the Rules Hearing is  
9 posted to our website.

10 UNIDENTIFIED MALE 2: Oh. When, when will  
11 that be posted?

12 MS. JUNG: I don't have an exact date for  
13 you, but I can let you know once I have a timeline on  
14 that.

15 UNIDENTIFIED MALE 2: Okay.

16 UNIDENTIFIED FEMALE 1: A lot of us had  
17 problems joining the meeting, just like this person  
18 also did. So we request you [unintelligible]  
19 [00:18:46] to recap a little further, because your  
20 answer wasn't as explanatory as we would have liked  
21 for the ones that did not hear the first, let's say  
22 five, 10 minutes. If we're just sitting silently,  
23 perhaps we could use that time for you to just be a  
24 little bit more informative about what these  
25 proceedings are for and what the proposed things are,

1 please.

2 MS. JUNG: Please give me one minute while I  
3 get back to you.

4 UNIDENTIFIED MALE 2: By the way, Ka- Ka-  
5 Ka-- Karline.

6 MS. JUNG: Karline, yeah.

7 UNIDENTIFIED MALE 2: Yeah. I wanted to let  
8 you know that the, the telephone, I tried to dial in  
9 on the phone.

10 MS. JUNG: Mm-hmm.

11 UNIDENTIFIED MALE 2: And the code number is  
12 not acc-, being accepted. You, you, you -- I mean, in  
13 other words, the, the -- so I can keep in late,  
14 because the 10 minutes I've been trying, there was a,  
15 a code number, 517021702, that's not recognized. And  
16 then I put in 231517021702 and it wasn't recognized.  
17 And then I put in the pass code, which was CIZMD6, and  
18 it wasn't recognized. So, if anybody is trying to  
19 call in, that, you know.

20 MS. JUNG: It's not working?

21 UNIDENTIFIED MALE 2: Yeah, it's not  
22 working.

23 MS. JUNG: Okay. Sorry about that. I'm not  
24 really sure what's going on with Teams.

25 UNIDENTIFIED MALE 2: So I don't know what



1           happened the first 10 minutes, so I, I'd like to hear  
2           it again, also.

3                   UNIDENTIFIED FEMALE 1: Same here. If you  
4           can discuss what you were saying, please, that would  
5           be great.

6                   MS. JUNG: Okay. If everyone could just  
7           give me one minute.

8                   MR. BOOKMAN: Oh, I --. Sorry, my mic  
9           wasn't working. Before you go, Karline, I mean, I,  
10          I'd also, once you get back, I'd be happy to restate  
11          my testimony, if that is, is useful for the folks who  
12          had technical difficulties.

13                   UNIDENTIFIED MALE 2: Now you see me?

14                   MS. JUNG: Yeah. So, unfortunately, we only  
15          allow people in the -- the prescribed time to give  
16          everyone a chance to provide testimony. But our  
17          transcript will be posted on our website as soon as  
18          possible.

19                   UNIDENTIFIED MALE 2: So, so, in other  
20          words, whatever transpired the first 10 minutes or 15  
21          minutes, you can't repeat?

22                   MS. JUNG: I don't believe so.

23                   UNIDENTIFIED MALE 2: Okay.

24                   UNIDENTIFIED FEMALE 1: Well, why don't you

25          --

1 [CROSSTALK} [00:21:37]

2 UNIDENTIFIED FEMALE 1: -- you, Karline, if  
3 you can at least repeat your, your spoken words in the  
4 beginning, that would help the ones that came in late.  
5 And also, Mr. Max B. was generous enough to say that  
6 he could repeat what he said. And that would give us  
7 a little bit more information. So if, if, you know,  
8 because it's not very informative for us to sit  
9 quietly. If you can take that time to let us know and  
10 fill us in.

11 MS. JUNG: Yeah, I can definitely repeat my  
12 introductory comments on the Rules Hearing. But,  
13 unfortunately, we are only allowed to prescribe a  
14 certain amount of time for everyone.

15 But I let everyone know that this is a Rules  
16 Hearing on adding rules to implement Local Law 128 of  
17 2021, allowing businesses to hold newsstand licenses.  
18 And I also informed everyone that this hearing afford  
19 public opportunity to comment on all aspects of the  
20 rules that we've proposed, and that we will carefully  
21 review all testimony and written comments received at  
22 this hearing.

23 And, so, if you would like to testify or  
24 give comments, this is your opportunity to do so.  
25 Everyone who provides comments will be given three

1 minutes.

2 MR. PATEL: Hello?

3 MR. BOOKMAN: Karline, would, do you want me  
4 to, would like me to -- am I able to repeat what I  
5 said for the folks who apparently had tech- technical  
6 difficulties being able to join?

7 MS. JUNG: Okay, yeah, you can re-, you can  
8 repeat your testimony.

9 MR. BOOKMAN: Okay, thank you. So, for  
10 those who were unable to join and had technical  
11 difficulties -- and thank you for that, Karline -- my  
12 name is Max Bookman. I am an attorney representing  
13 the New York City Newsstand Operators Association, the  
14 industry trade association representing sidewalk  
15 newsstands since 1988.

16 When we, when I spoke previously, I thanked  
17 the Department for allowing us the opportunity to, to  
18 speak today. I also submitted written testimony, so  
19 anyone in this hearing will, will have access to our  
20 written testimony. They could either e-mail me or  
21 check it out on the Department's record when they,  
22 when they post it.

23 The written testimony is detailed. These  
24 are, these are complicated regulations and we don't  
25 have the time on this call to get into the, the, the

1 technical details. So, when I had my chance to speak,  
2 I made three main points.

3 The first is that we are strongly in  
4 opposition to the portion of the rules that apply  
5 retroactively, new rules that could basically, in  
6 their operation, have the effect of putting a sidewalk  
7 newsstand either out of business or forcing them to  
8 relocate to a place where may or may not be available  
9 for them to, to, to continue being in business,  
10 particularly the pedestrian plaza regulations that  
11 have been proposed.

12 For the most part -- there are some  
13 exceptions, but for the most part, the way that they  
14 operate is that an existing sidewalk newsstand that is  
15 now in an area that DOT has designated as a pedestrian  
16 plaza in a process that, that DOT has, which is not  
17 very clear, could be put out of business, which is  
18 completely unacceptable.

19 I pointed out that there, there's a lot of  
20 words in the regulations currently about pre-1991 and  
21 post-1991 newsstands. The reason why that's in the  
22 regulations is because the last time the Department  
23 did a significant rulemaking on sidewalk newsstands,  
24 which was in 1991, and they added new siding criteria,  
25 they recognized that it was not acceptable to have

1 those criteria apply retroactively. And, so, there  
2 was an old set of rules for pre-1991 newsstands and a  
3 new set of rules for post-1991 newsstands. We need  
4 the same thing here.

5 Similarly, there's reg-, there's, there's  
6 words in the regu-, in the proposed regulations that  
7 could operate to put a, where the, where, by which the  
8 franchisee, which is currently J.C. Decaux, could  
9 potentially put a sidewalk newsstand out of business  
10 based on certain vague construction determinations  
11 that they could make in, in the renewal of an existing  
12 sidewalk newsstand. That's not acceptable, and we  
13 propose a solution in our, in our, in our written  
14 submission.

15 We do applaud the Department for its  
16 proposal on the vacancy rules, which is building on an  
17 informal process that's already been in existing for a  
18 few years in the Department for existing sidewalk  
19 newsstand operators -- par- pardon me, for sidewalk  
20 newsstand applicants to be able to get a vacant  
21 newsstand. We, we think that's particularly important  
22 and needs to stay in the final rules, especially  
23 because most of these rules are designed to make it  
24 extremely hard to have a new sidewalk newsstand built  
25 in New York City. And so, if we're not going to be

1 building new sidewalk newsstands in New York City,  
2 which we've stopped doing for a few years now, then  
3 there needs to be more opportunities for people to get  
4 into this industry in existing newsstands, and the  
5 vacancy rules do that.

6 And then, finally, in my, I, I, I, I noted  
7 in our, in my, my oral testimony, as well in our  
8 written testimony, that we, we really encourage the  
9 Department to give, to give sidewalk newsstands that  
10 are suffering from retail theft, there's been a lot of  
11 theft, assaults, terrible crime being, you know, put  
12 onto sidewalk newsstand operators right now. We've  
13 been talking to the NYPD about it. The regulations  
14 need to give sidewalk newsstand operators the ability  
15 to make certain common sense safety modifications to  
16 their newsstands without fear that doing so could  
17 result in them getting summonses by the Department for  
18 modifying the newsstand in ways that are currently not  
19 permitted.

20 So, all of that, again, is in our, our, our  
21 written testimony. And thank you again, Karline, for  
22 giving me this opportunity to recap for those who were  
23 not able to join.

24 UNIDENTIFIED MALE 2: Can I say something?

25 MS. JUNG: Yes, you can provide comments.

1 It just has to be in, under three minutes. That's the  
2 only --

3 UNIDENTIFIED MALE 2: Okay. I just wanted  
4 to ask Max something. You said, you said about,  
5 because there's a lot of crime. What, what, what  
6 would be the modifications so that the, the crime rate  
7 would, that, that the, the news- newsstand operator  
8 would be protected?

9 MS. JUNG: I'm sorry.

10 MR. BOOKMAN: Karline is going to stop me, -  
11 -

12 MS. JUNG: Yeah.

13 MR. BOOKMAN: -- because we're not allowed  
14 to ask any questions.

15 MS. JUNG: Sorry.

16 MR. BOOKMAN: But if you'd like --

17 UNIDENTIFIED MALE 2: Oh.

18 MR. BOOKMAN: -- to contact me afterwards or  
19 get our written testimony, you'll see what we're  
20 talking about.

21 UNIDENTIFIED MALE 2: Okay, great. Thank  
22 you. I didn't know you're not allowed to ask  
23 questions. Okay, no problem.

24 MS. JUNG: Yeah. If, if you'd like to  
25 provide any comments or testimony, you can do so.

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UNIDENTIFIED MALE 2: No.

MS. JUNG: Okay. If anyone else would like to provide any comments or testimony, please let me know. Thank you.

UNIDENTIFIED MALE 2: I'm not allowed to ask questions, so it doesn't matter. We can only give comment or, or -- right? No questions allowed.

MS. JUNG: Okay. Seeing no one present to offer testimony, I will adjourn this hearing until an indi- individual appears to offer testimony or until 12:00 p.m., whichever comes first.

For those who just joined, if you would like to provide any comments or testimony, please let me know. Thank you.

Seeing that it is now 12:00 p.m., I will adjourn the hearing. Thank you, everyone, for participating.

[END OF PUBLIC HEARING]



CERTIFICATE OF ACCURACY

I, Ryan Manaloto, certify that the foregoing transcript of DCWP Rules Hearing - Newsstand Licenses on April 29, 2024, was prepared using the required transcription equipment and is a true and accurate record of the proceedings.

Certified By



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Date: May 17, 2024

GENEVAWORLDWIDE, INC  
228 Park Ave S - PMB 27669  
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