

Tue 2/15/2022 11:01 AM

*Charter is committed to protecting the environment in the cities that we serve and to which we provide critical communications infrastructure as outlined in our Franchise Agreement. All Charter owned vehicles operating in NYC are retrofitted with telematics equipment which monitors excessive idling times and reinforces the internal policies in place to ensure compliance with local idling regulations.*

*The majority of Charter owned vehicles are also retrofitted with a secondary battery which is directly connected to the inverter which supplies power to the multitude of communications equipment used to maintain our critical customer network. As much of this equipment is used to monitor, analyze, and maintain the network, the power drain is continuous and drains the equipment, primary, and secondary batteries quickly, forcing the vehicle to power up to recharge the batteries and keep the equipment powered. In addition, many of the vehicles we operate, specifically Fiber Labs, require temperature control during splicing operations and to power specialized manhole equipment to vent toxic fumes from manholes.*

*Taking into consideration the many specialized communications tools used to maintain our customer's network, such as Signal meters, Pressure Testers, and Fusion Slicers, none consume as much power as laptops and handhelds. The powerful software which analyzes and monitors the network data causes the batteries on the computer equipment to drain quickly. Compounding the issue is the fact that modern laptops and handhelds do not come with interchangeable batteries. This again forces vehicles to power up in certain circumstances to charge the batteries and keep the equipment running.*

*In conclusion, despite having rigorous policies in place, investing in telematics monitoring, investing in secondary batteries and inverters, and investing in the highest available battery capacity equipment, our technicians cannot perform their customer impacting work duties without the critical equipment being properly powered.*

Thursday, February 10, 2022 9:25 AM

Hi Mark-

I will confer with staff internally and get back to you regarding the questions and issues you raise.

Regards,

Alex

Thursday, February 10, 2022 8:27 AM

Dear Mr. Camarda:

I am writing in response to Charter/Spectrum's recent request for a variance from section 24-163 of the Air Code. Your request for a variance seems to be based on the need to supply power from the engine to operate the inverter. which powers several pieces of equipment including but not limited to pressure testers and laptops. It is unclear why the use of alternative technology, or additional batteries, will not address this problem, especially with regard to laptops. A showing of unreasonable hardship is required in order for a variance to be granted, as well as a showing as to what steps you are taking to mitigate the

need for your vehicles to idle. Please provide any information as to technologies that you have considered to reduce idling, and why it would be an unreasonable hardship for you to use them, so that we may evaluate this variance and balance the operational needs of your fleet and the environmental impacts caused by unnecessary idling.

Thank you,  
Mark