



Brink's U.S. A Division of Brink's, Incorporated 555 Dividend Drive Coppell, TX 75019 U.S.A. Tel: (469) 549-6000 Fax: (469) 549-6444

A Subsidiary of The Brink's Company

December 7, 2023

#### VIA EMAIL TO: MARKPA@DEP.NYC.GOV ALYSSAP@DEP.NYC.GOV

Mark Page, Jr. Executive Director Bureau of Environmental Compliance Department of Environmental Protection 59-17 Junction Blvd., 8th Floor Flushing, NY 11373

Alyssa Preston Bureau of Environmental Compliance Department of Environmental Protection 59-17 Junction Blvd., 8th Floor Flushing, NY 11373

Dear Executive Director Page:

On behalf of Brink's, Incorporated, Brink's Global Services USA, and their subsidiaries, affiliates, and parent company ("BRINK'S"), I write to request a variance from Section 24-163 of the Air Code. I am enclosing our completed Air Code Variance Application ("Application") and including an explanation of items annexed to the Application ("Attached Materials").

As established in the Attached Materials, Brink's is immediately incorporating electric armored vehicles and idle-reducing technology into its fleet to reduce transportation carbon emissions. Brink's is also outfitting its Brooklyn fleet facility with approximately 30 electric charging stations to support Brink's fleet of electric armored vehicles. We believe the actions outlined in our Application and the supporting materials demonstrate our commitment to reducing emissions associated with vehicle idling in New York City.

I appreciate your consideration in this matter. Should you have any questions, please feel free to contact me.

Sincerely,

William Mathew Ryder VP, Fleet Operations

#### <u>Materials In Support of Brink's Variance as outlined in §24-163 of the New York</u> <u>City</u>

By way of information, Brink's, Incorporated and Brink's Global Services USA, Incorporated ("BRINK'S"), is engaged in the security and transportation business. Brink's business involves transporting, protecting, and storing currency, coin, negotiable instruments, precious metals, gemstones, and other valuables for its customers. Brink's provides these services by dispatching a fleet of armored vehicles across New York City to service its customers. These services are performed by dispatching specialized armored vehicles on predetermined routes and following strict time schedules to satisfy our customers' needs and ensure the safety of our employees, customer, and the public.

### A. Brink's Armored Vehicle Operation, Armored Truck Configuration, and Employee and Customer Safety

Above all else, Brink's prides itself on providing its crew the highest level of safety and security, especially those who operate armored vehicles in the field and its customers. Due to the unique nature of armored vehicles and the dangers to life and property they are designed to protect against, Brink's respectfully requests a variance from New York City Administrative Code Sec. 24-163 to allow its armored vehicles to idle for greater than three (3) minutes. Permitting greater idling will allow the armored vehicle to mobilize quickly in the event of an imminent attack, thus avoiding potential danger to our crew, the general public, and property. Additionally, Brink's vehicles are all outfitted with equipment designed to promote the safety of our vehicle crew (and the public), including but not limited to bullet-resistant windows, temperature control systems, security cameras, sirens, and sensors, and this equipment requires a significant draw on the vehicle's power and necessitates the continuous operation of the vehicle.

Shutting these vehicles off creates security risks and potential danger to the Brink's crew and the public, any of which could require City resources (including city and state law enforcement) to address (*See* National Armored Car Association letter dated October 18, 2022, attached).

In addition to the security protocols, there are health and safety reasons why Brink's is requesting the ability to idle occasionally: the sealed armored vehicle's windows do not roll down, thus requiring heat or air conditioning for ventilation and climate control. Typically, while making a delivery or pick up of valuables, a Brink's crew member exits from the rear or side compartment of the armored vehicle. At the same time, the Driver remains in the vehicle's front cab, guarding the property within the vehicle and acting as a Guard for the Messenger while staying vigilant and observing the surrounding area for potential danger or attack. As mentioned above, the armored vehicle has windows that cannot roll down for security reasons. The Driver can only open their door under certain controlled circumstances. The Driver must be able to operate the vehicle's air conditioner/heater for a safe level of airflow and vehicle temperature.

#### B. Anti-Idling Technology, Sustainable Vehicles, and Electric Vehicles.

Brink's operates approximately 72 armored vehicles in New York City (through Brink's, Incorporated and Brink's Global Services USA Incorporated). As outlined below, by the beginning

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of 2025, Brink's armored vehicle fleet operating in New York City will be electric or equipped with idle-reducing technology (through a combination of new idle-reducing vehicles or installation of idle-reducing technology on its existing fleet):

- Brink's has a contract for 53 new 2023 Ford Transit Vans with idle reduction technology. This idle reduction technology is programmable and will lessen idling times to comply with city ordinances. Specifically, the upfitter has integrated hardware with operating software to regulate the vehicle's temperature. Brink's can set a temperature range that activates the heat or A/C when the vehicle gets above/below a set threshold. (Brink's can also ensure employee safety and power the security camera without the truck engine being on.) So, in the summer or winter, there may be days where the temperature requires Brink's to keep the vehicle running for longer than 3 minutes for driver safety purposes (so the vehicle does not get too hot or cold when off for an extended time). Still, driver safety will be the only reason the truck idles for a duration that exceeds 3 minutes. *See* Exhibit A for the Purchase Agreement and Delivery Schedule
- Brink's is implementing "IdleSmart" on 19<sup>1</sup> non-Ford Brink's vehicles already operating in the fleet to achieve a 100% equipped idle reduction solution for our fleet operating in NYC. The installation of the idle reduction technology has already begun on several non-Ford trucks. *See* Exhibit B, "Purchase Order" and "Statement of Work" with Idle Smart
- In addition to the immediate implementation of idle reduction technology in 100% of Brink's vehicles in NYC by the end of 2023, and assuming Brink's receives the permits from NYC required to proceed with infrastructure changes necessary to install electric chargers in its facility, Brink's will update its NYC fleet so that 35 of its vehicles (\*the total amount of vehicles is subject to change based on evolving business needs) will be EVs by the end of Q4 2024. As noted above, all remaining vehicles in NYC (aside from the 35 EV vehicles) will still possess the idle reduction technology being installed by the end of 2023. As EVs are rolled out in NYC, these vehicles will ultimately replace 35 of the above-referenced Ford and non-Ford vehicles (all of which will have utilized the idle-reduction technology by this time). *See* Exhibit C Lease Agreement for Brink's acquisition of EVs.
- Brink's is upgrading the current Brooklyn facility to accommodate the influx of EVs. Specifically, this means modifying existing power circuits and loads to reduce the amount of power used so that there is ample power for 39 EV chargers to charge 35

<sup>&</sup>lt;sup>1</sup> While the Purchase Agreement is for 30 vehicles, the amount has subsequently been modified to reflect a decreased need for these vehicles.

EVs efficiently. The upgrade is expected to take six months and will be done before the end of Q4 2024.<sup>2</sup> *See* Exhibit D for the EV Installation Plan.

• Brink's intends to brand the non-EV vehicles to be easily recognized by the public as "Idle Reduction Technology Equipped." The EVs will be branded similarly, reading 'ZERO EMISSION VEHICLE' beneath the Brink's logo. *See* Exhibit E for markup of Brink's Vehicle Branding

 $<sup>^{2}</sup>$  Based on the size of the Brooklyn facility where the vehicles will be located, 35 EVs is the maximum amount of EVs that can fit into that space (because there is insufficient space to park additional EV vehicles based on how/where the chargers need to be located).





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I. Details of the Vehicle or Description of the fleet:

Make....., Model....., Year......

- II. Does this vehicle or fleet run on gasoline or diesel?
- III. What is vehicle's weight rating (GVWR) and registered weight for the vehicle? If

the vehicles are identical, please provide just one weight of the vehicle.

For answers to items I through III, please see Table attached

IV. How much power is required to power all the required units in the vehicle or the

fleet?

- a. List all the equipment that requires external power.
  - Air Conditioner and heating (large cabin, no windows that can open)
  - Camera system 4-6 cameras with continuous recording
  - Siren
  - Public Address (PA) System
  - Electronics locks (80 amps for short burst)
  - Security System
  - RFID Readers
  - Biometric scanners
  - Onboard image processing computer
  - Telematics/GPS/cell data modem
- b. How many hours is required for each piece of equipment to run on external power?

All the equipment listed above is operated continuously

#### V. Have you considered installing a Battery power APU unit or Gasoline power APU?

See attached materials for a description of Brink's fleet upgrade

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- 1. If yes, list APU details .....
- 2. Explain in detail why we should approve your waiver, including a cost analysis, undue hardship burdens, and improvements to your fleet to reduce engine idling.

See attached materials for a description of Brink's fleet upgrade

Branch Name	VIN	Lic Plate	GVWR	Notes
BROOKLYN	4UZAARFD4JCJY1762	2961802	26000	
BROOKLYN	1FDXE4FS5HDC09587	2482513	14500	
BROOKLYN	1FDXE4FS8HDC09583	2482512	14500	
BROOKLYN	4UZAARFD6JCJY1763	3214626	19501	
BROOKLYN	1FTBR1C80NKA81731	13519NE	9070	
BROOKLYN	1FTBR1C81PKA76900	22247NE	9070	
BROOKLYN	1FTBR1C82NKA81732	13515NE	9070	
BROOKLYN	1FTBR1C82PKA76517	49651NE	9070	
BROOKLYN	1FTBR1C83NKA81688	13580NE	9070	
BROOKLYN	1FTBR1C83PKA76624	49650NE	9001	
BROOKLYN	1FTBR1C84NKA81652	13518NE	9070	
BROOKLYN	1FTBR1C85NKA81675	13578NE	9070	
BROOKLYN	1FTBR1C85NKA81692	13581NE	9070	
BROOKLYN	1FTBR1C85PKA76771	22249NE	9070	
BROOKLYN	1FTBR1C85PKA76849	22248NE	9070	
BROOKLYN	1FTBR1C87NKA81631	13579NE	9070	
BROOKLYN	1FTBR1C87NKA81645	13517NE	9070	
BROOKLYN	1FTBR1C88NKA81668	13576NE	9070	
BROOKLYN	1FTBR1C88NKA81718	13524NE	9070	
BROOKLYN	1FTBR1C88PKA76943	22246NE	9070	
BROOKLYN	1FTBR1C89NKA81646	13516NE	9001	
BROOKLYN	1FTBR1C89NKA81677	13577NE	9070	
BROOKLYN	1FTBR1C8XNKA81607		9070	In the registration process
BROOKLYN	1FTBR1C8XNKA81672	13575NE	9070	
BROOKLYN	1FTBR2C80NKA81881		9070	In the registration process
BROOKLYN	1FTBR2C82NKA81770		9070	In the registration process
BROOKLYN	1FTBR2C82NKA81798		9070	In the registration process
BROOKLYN	1FTBR2C87NKA81764		9070	In the registration process
BROOKLYN	1HTSCAAM6YH284760	2907792	25500	
BROOKLYN	1HTSCAAM41H385513	2907852	25500	
BROOKLYN	1HTSCAAM72H505368	2907949	25500	
BROOKLYN	1HTSCAAM72H538127	2907741	25500	
BROOKLYN	1HTSCAAM72H554781	2907853	25500	
BROOKLYN	1HTSCAAM22H554817	2933018	25500	
BROOKLYN	1HTMMAAM64H595007	2907866	25500	
BROOKLYN	1HTMMAAM84H595008	2907854	25500	
BROOKLYN	1FTNX21F2XEB97430	46998JX	8800	
BROOKLYN	1HTMMAAM26H263777	2907748	26000	
BROOKLYN	1HTMMAAM36H263805	2907956	25500	
BROOKLYN	1HTMMAAM07H455250	2907676	26000	
BROOKLYN	1HTMMAAM47H488283	2907957	25500	
BROOKLYN	1HTMMAAM57H488289	2907859	26000	
BROOKLYN	1HTMMAAM87H488321	2907962	25500	
BROOKLYN	1HTMMAAM47H412420	2481873	26000	
BROOKLYN	1HTMMAAM97H412431	2481884	26000	
BROOKLYN	1HTMMAAM27H412433	2481886	26000	

BROOKLYN	1HTMMAAP07H363436	2481913	29000	
BROOKLYN	1HTMMAAP27H363437	2481914	29000	
BROOKLYN	1HTSCNNP5NH415586	2907958	25500	
BROOKLYN	1HTSCACM3SH613399	2933827	25500	
BROOKLYN	1HTSCACMXSH613397	2907959	25500	
BROOKLYN	1HTSCAAMXSH669231	2907960	25500	
BROOKLYN	1HTSCAAN5SH667864	2907961	35000	
BROOKLYN	1HTSCAAM0XH670038	2907749	23500	
BROOKLYN	1HTSCAAM3XH664041	2907934	25500	
BROOKLYN	1HTWGAZR5AJ281630	2482064	53000	
BROOKLYN	3HAMNAAM1BL383944	2482080	26000	
BROOKLYN	3HAMNAAM7BL383947	2482081	26000	
BROOKLYN	3HAMNAAM22L383953	2482084	26000	
BROOKLYN	3HAMNAAM8BL383956	2482086	26000	
BROOKLYN	3HAMNAAMXBL383957	2482087	26000	
BROOKLYN	3HAMNAAM6BL383972	2482090	26000	
BROOKLYN	3HAMNAAM6BL383986	2482092	26000	
BROOKLYN	3HAMNAAM8BL383987	2482093	26000	
BROOKLYN	3HAMNAAMXBL383988	2482094	26000	
BROOKLYN	3HAMNAAM1BL383989	2482096	26000	
BROOKLYN	3HAMNAAM9BL384016	2482099	26000	
BROOKLYN	3HAMNAAM6BL384023	2482100	26000	
BROOKLYN	1HTMNAAM7BJ393778	2482102	26000	
BROOKLYN	3HAMNAAM4BL383937	2482103	26000	
BROOKLYN	1HTMNAAM9BJ393779	2482104	26000	
BROOKLYN	1HTMMAAN2BH315086	2482115	33000	
BROOKLYN	1HTJSSKK2CH089555	2482156	19500	
BROOKLYN	1HTJSSKKXCH089559	2482160	19500	
BROOKLYN	1HTMNAAM2CH590768	2482136	26000	
BROOKLYN	3C7WDMBL1CG329757	2907858	19500	
BROOKLYN	5PVNE8JT9D4S55212	2907795	26000	
BROOKLYN	5PVNE8JG2D4S50047	2907796	26000	
BROOKLYN	1HTMNAAM2CH590866	2933802	26000	
BROOKLYN	1HTMNAAM9CJ590856	2756113	26000	
BROOKLYN	3C7WDMBL9CG176108	2933525	20000	
BROOKLYN	3C7WRMAJ2FG539550	2907941	18000	
BROOKLYN	1HTMNAAMXCH590890	2482181	26000	
BROOKLYN	1HTMNAAM2CH590897	2756283	26000	
BROOKLYN	1HTMNAAM4CH590898	2482184	26000	
BROOKLYN	3C7WRMAJ2FG544960	2907950	18000	
BROOKLYN	3C7WRMAJ3FG539556	2907951	18000	
BROOKLYN	3C7WRMAJ3FG607791	2907942	18000	
BROOKLYN	3C7WRMAJ4GG162821	2907952	18000	
BROOKLYN	3C7WRMAJ6FG539552	2933745	18000	
BROOKLYN	1FDAF5GT0GEB87538	2482429	19500	
BROOKLYN	3C7WRMAJ8GG325485	2907953	18000	
BROOKLYN	3C7WRMAL5DG561217	2907867	18750	

4UZAC2EA0LCLS5271	2933799	19500	
4UZAC2EA1LCLY3468	2933948	19500	
3HAWGTAR3HL151509	2559948	54000	
NM0LS6E71K1416102	2907706	5270	
3HAMMMML8JL694793	2907954	26000	
3HAMMMML6JL694792	2907955	26000	
3HAMMMML8JL694776	2907945	25500	
4UZAC2EA2LCLS5157	2907620	19500	
4UZAC2EA4LCLS5161	2907624	19500	
2NP3LJ9X6JM478852	2756088	54600	
2NP3LJ9X0JM478863	2756219	54600	
3HAMMMML1KL102863	2933507	26000	
3HAMMMML3KL102864	2933508	26000	
3HAMMMML1KL107237	2933506	26000	
4UZAC2EA6JCJP9150	2702692	19500	
4UZAC2EA6LCLY3465	2933945	19500	
4UZAC2EA7LCLY3443	2962159	19500	
4UZAC2EA8LCLS5230	2933497	19500	
4UZAC2EA8LCLS5244	2933594	19500	
4UZAC2EA9LCLS5270	2933798	19500	
4UZAC2EA9LCLX2718	2961876	19500	
4UZAC2EAXJCJP9118	2702590	19500	
4UZAC2EAXLCLS5245	2933595	19500	
4UZAC2EAXLCLY3467	2933947	19500	
1FADP3K26FL338433	52345MH	3250	
1FADP3K29FL353511	HCL3525	3250	
1HTSCNKMXNH406778	2933644	25500	
3HCDZAPR5LL169507	29145PF	0	
JALC4W163K7007735		14001	
1HTMMMML2JH349376	2712245	19501	
1HTMMMML9GH219703	2391153	19501	
	4UZAC2EA0LCLS5271 4UZAC2EA1LCLY3468 3HAWGTAR3HL151509 NM0LS6E71K1416102 3HAMMML8JL694793 3HAMMMML8JL694793 3HAMMMML8JL694776 4UZAC2EA2LCLS5157 4UZAC2EA4LCLS5161 2NP3LJ9X6JM478852 2NP3LJ9X0JM478863 3HAMMML1KL102863 3HAMMMML1KL102863 3HAMMMML1KL102864 3HAMMMML1KL107237 4UZAC2EA6JCJP9150 4UZAC2EA6JCJP9150 4UZAC2EA6JCJP9150 4UZAC2EA6JCLY3465 4UZAC2EA7LCLY3443 4UZAC2EA8LCLS5240 4UZAC2EA8LCLS5244 4UZAC2EA8LCLS5244 4UZAC2EA9LCLS5270 4UZAC2EA9LCLS5270 4UZAC2EA9LCLS5270 4UZAC2EAXLCLS5245 4UZAC2EAXLCLS5245 4UZAC2EAXLCLY3467 1FADP3K26FL338433 1FADP3K26FL338433 1FADP3K26FL338433 1FADP3K26FL338433 1FADP3K26FL338433 1FADP3K26FL338433	4UZAC2EA0LCLS5271       2933799         4UZAC2EA1LCLY3468       2933948         3HAWGTAR3HL151509       2559948         NMOLS6E71K1416102       2907706         3HAMMMML8JL694793       2907954         3HAMMMML8JL694792       2907955         3HAMMMML8JL694776       2907945         4UZAC2EA2LCLS5157       2907620         4UZAC2EA4LCLS5161       2907624         2NP3LJ9X6JM478852       2756088         2NP3LJ9X0JM478863       2756219         3HAMMMML1KL102863       2933507         3HAMMMML1KL102864       2933508         3HAMMMML1KL102863       2933507         3HAMMMML1KL107237       2933506         4UZAC2EA6JCLY3465       2933945         4UZAC2EA6JCLY3465       2933945         4UZAC2EA8LCLS5230       2933497         4UZAC2EA8LCLS5244       2933594         4UZAC2EA9LCLS5270       2933798         4UZAC2EA9LCLS5245       2933595         4UZAC2EAXLCLY3467       2933947         4UZAC2EAXLCLY3467       2933947         1FADP3K26FL338433       52345MH         1FADP3K26FL338433       52345MH         1FADP3K26FL338433       52345MH         1FADP3K26FL353511       HCL3525	4UZAC2EA0LCLS52712933799195004UZAC2EA1LCLY34682933948195003HAWGTAR3HL151509255994854000NM0LS6E71K1416102290770652703HAMMMML8JL6947932907954260003HAMMMML6JL6947922907955260003HAMMMML8JL6947762907945255004UZAC2EA2LCLS51572907620195004UZAC2EA4LCLS51612907624195002NP3LJ9X6JM4788522756088546002NP3LJ9X0JM4788632756219546003HAMMML1KL1028632933507260003HAMMMML1KL1028642933508260003HAMMMML1KL1072372933506260004UZAC2EA6LCLY34652933945195004UZAC2EA6LCLY34652933945195004UZAC2EA8LCLS52442933594195004UZAC2EA8LCLS52452933594195004UZAC2EA9LCLX27182961876195004UZAC2EAALCLS52452933947195004UZAC2EAXLCLS52452933595195004UZAC2EAXLCLS52452933947195004UZAC2EAXLCLS52452933595195004UZAC2EAXLCLS52452933947195004UZAC2EAXLCLS52452933947195004UZAC2EAXLCLS52452933947195004UZAC2EAXLCLS52452933947195004UZAC2EAXLCLS52452933947195004UZAC2EAXLCLS52452933947195004UZAC2EAXLCLS52452933947195004UZAC2EAXLCLS52452933947195001FADP3K26FL338433



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October 18, 2022

Mark Page, Jr. Executive Director Bureau of Environmental Compliance Department of Environmental Protection 59-17 Junction Blvd., 8th Floor Flushing, NY 11373

#### **RE: Variance from Idling Law**

Dear Director Page:

Alyssa Preston Bureau of Environmental Compliance Department of Environmental Protection 59-17 Junction Blvd., 8th Floor Flushing, NY 11373

On behalf of the National Armored Car Association (NACA), we write in support of industry variance petitions from section 24-163 of the Air Pollution Control Code ("Code") to allow for idle times of more than three minutes, or one minute if adjacent to a school, while armored cars are actively being used in the course of doing business. These variances are necessary to prevent our member companies from facing the unreasonable hardship that compliance with the Code would entail while they work to build upon their satisfactory progress in reducing carbon emissions via transformations to their fleet operations and to allow for the industry to continue reducing the risk to New York City's small businesses and financial institutions.<sup>1</sup>

Formed in 1929, NACA is a business association that brings together the three major companies of the armored car industry—Brink's, Garda, and Loomis—with a focus on protecting and promoting the common interests of the industry. These three organizations comprise approximately 90% of the armored car industry in the United States, and NACA members have handled virtually every dollar and coin in circulation. They provide secure transportation and cash management services for the Federal Reserve, financial institutions, state and local governments, and private businesses and individuals across the United States and internationally.

#### Justification for Variance

Given our industry's role in transporting, protecting, and storing, coin, currency, negotiable instruments, precious metals, gemstones, and other valuables, armored car guards are attractive targets for criminal enterprises. Statistics compiled by NACA members reveal that the majority of armored car robberies involve the use of violent force and occur when the armored car is stopped and the crew members are outside the safety of the vehicle. For instance, since 2000, there have been an average of fifty-three (53) armored car robberies per year, of which eighty-six percent (86%) involved the use of violent force and eighty-seven percent (87%) occurred while the employee was outside the safety of his/her truck. Most of these robberies and attempted robberies occur in highly populated urban areas widely accessed by the public and require the response of law enforcement—creating a potential threat to both the general public and peace officers. Based on the number of armored cars in operation in the U.S. (approximately 7,820) and number of stops per day (approximately 35) each vehicle makes, there are approximately **199,801,000** exposures per year where there is the potential for an armored car robbery to be committed when at least one crewmember is out of the vehicle.

<sup>&</sup>lt;sup>1</sup> The September 2022 Mayor's Management Report found "unparalleled increases in major crime categories," noting increases in felony crime (26%), robbery (24%), and felonious assault (17%) in the fiscal year 2022 vs. 2021. Our industry reduces risks facing small and large businesses, banks, and residents, through cash management assistance.



### National Armored Car Association

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Given these recognized hazards to our employees and the public, armored car companies work to minimize the risks associated with robbery attempts. This includes significant investments in the development of specialized armored vehicles that are built with bullet resistant glass and panels, sealed from outside elements and retrofitted with energy-intensive security systems that are designed to protect guards—as well as the general public and peace officers—during customer pickups and drop offs. These security systems include cameras, sirens, sensors, electronic locks, and other equipment that require a constant and significant source of energy during prolonged stops that only a truck's engine can reliably power. For instance, external cameras must operate continually to allow the driver, who must be ready to reposition the vehicle at a moment's notice in the case of a robbery attempt, to remain vigilant of external threats. Furthermore, due to the sealed design of armored vehicles, the heat or a/c system must run continually during a stop to maintain a healthy ambient temperature and volume of airflow inside the cab and cargo areas. If a truck were to power off during a stop, security and air conditioning systems would drain the truck's battery, potentially stranding the crew and exposing the driver to extreme temperatures. As a result of these factors, the engine must remain running during stops to ensure the operability of security systems, temperature regulators, and operational protocol necessary to the safety of all parties.

#### **Reducing Fleet Emissions – Satisfactory Progress Achieved**

While writing to express support for NACA members' variance requests, we also acknowledge that the largest part of the armored car industry's carbon footprint comes from transportation. As a result, we want to draw your attention to the significant steps our industry is taking to reduce carbon emissions and some of the challenges that have arisen in trying to get there. As has been discussed earlier in this letter, transportation of valuables and cash requires the use of armored vehicles. The weight and compact design of these vehicles are unique to our industry and as such our members must pilot potential alternative solutions to fleet design and operation before adoption. This takes time, significant financial investment and can result in delays or drawbacks if the piloted changes do not end up working as intended. For instance, some of NACA's members spent significant resources and time to develop an idle-reduction system which automatically turned off the engine when the driver shifted into park—but that kept the internal systems running. Unfortunately, after testing prototypes of the technology in the field, system reliability issues prevented companies from moving forward with its adoption.

However, NACA members haven't stopped exploring alternative and environmentally friendly options for fleets where appropriate, such as the use of lighter vehicles, increased route optimization and efficiency, fleet management software, minimizing the total number of vehicles on the road and replacing eligible vehicles with hybrid and/or electric alternatives. In the case of transitioning fleets to electric, one member successfully worked with a vehicle supplier to test technical solutions for electrical armored trucks and purchased 20 electrified armored vehicles at the beginning of 2021. However, due to a shortage of components and challenges with infrastructure, the delivery of those vehicles has been delayed.<sup>2</sup> Another member has deployed more than 150 armored vehicles based on the newest generation of gas engines with lower emission levels and more efficient fuel consumption throughout the country.<sup>3</sup> Yet another member is testing solar panels on segments of new vehicles and piloting new start-stop technology.<sup>4</sup> As the industry invests substantially in sustainability initiatives, we urge recognition that developing such technologies takes time.

<sup>&</sup>lt;sup>2</sup> Loomis Interim Report January - June 2022

<sup>&</sup>lt;sup>3</sup> GardaWorld-2021-Sustainability-Report.pdf

<sup>&</sup>lt;sup>4</sup> Brinks Sustainability Update July 2022



1015 15<sup>th</sup> St NW, Suite 600 Washington, DC 20005

> 603.582.7334 basil@ulmanpolicy.com

#### **Precedent Exists for Such Variance Requests**

Finally, we draw your attention to the fact that there is precedent for granting variance requests from anti-idling laws. In fact, both the United States Environmental Protection Agency and California Environmental Protection Agency Air Resources Board recognize the critical importance of exempting armored car operators from idling requirements. The EPA's Model State Idling Law exempts armored car vehicle idles "when a person remains inside the vehicle to guard the contents, or while the vehicle is being loaded or unloaded," stating that such exemption is "common sense" similar to that of emergency vehicles.<sup>5</sup> California's Environmental Protection Agency Air Resources Board issued an advisory acknowledging and exempting armored cars from idling: (1) "necessary for operating video cameras" as they "may need to be in constant operation and of sufficient draw to require idling the vehicle's primary engine," or (2) "to avoid a safety or health emergency" as crew "health and safety could be compromised if they were not allowed a source of heat or air conditioning," and "for safety purposes the engine may need to remain running in order to be able to leave the premises abruptly in the event of an attempted robbery or other emergency situation."<sup>6</sup> The state of California also recognizes this vital exemption in the recently amended California Code of Regulation Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.<sup>7</sup> Prior to 2022, the NYC Department of Environmental Protection approved "common sense" variance requests for NACA members to idle for greater than three minutes. We encourage the Agency to resume approving variance requests from our industry, a common practice nationwide, even in stringent states.

#### Conclusion

Given the aspects of operational security and the safety considerations of the people of New York City, we respectfully request that the Department of Environment Protection approve the anti-idle variance requests submitted by our members. Without approving these requests, the restrictions placed on guard operations will negatively and significantly impact the ability of our industry to ensure the safety of our guards, cargo, bystanders, and law enforcement. The industry will continue to advance pledges to increase its sustainability and reduce its carbon footprint and asks during this intensive research and development process that the city support safe practices that protect the people and businesses of New York.

Sincerely,

Basil Thomson

Basil Thomson Executive Director, NACA

CC Mayor Eric Adams Police Commissioner Keechant Sewell

<sup>&</sup>lt;sup>5</sup> Office of Transportation and Air Quality, Model State Idling Law § (2006).

<sup>&</sup>lt;sup>6</sup> Air Resources Board, Armored Vehicle Idling Advisory § (2008).

<sup>&</sup>lt;sup>7</sup> Cal. Admin. Code tit. 13, § 2485, 13 CA ADC § 2485

# EXHIBIT A

#### SCHEDULE A – STATEMENT OF WORK #

- 1.1 This Statement of Work (hereinafter, SOW) will confirm the mutual understanding and agreement of CITE ARMORED, INC. ('SELLER") and BRINKS INCORPORATED ("BUYER") as to the terms and conditions pursuant to which SELLER, itself and through its direct and indirect subsidiaries and/or agents, will provide the Goods and/or Services described in the SOW to BUYER:
  - Produce and upfit armored boxes of 76 units unless BUYER requires more to accelerate production.
  - SELLER will deliver between 4 and 12 vehicles per month as outlined in Schedule B.5 Production Schedule.
  - Freeze the prices listed on pricing list below for the duration of the PO as long as the quantity ordered is maintained by Brink's. If modifications are requested to the vehicles, prices will be adjusted accordingly with BUYER'S approval.
  - Complete vehicle Price:
    - 0-100 units: \$ USD per unit
  - BUYER commits to purchasing a total of 76 2023 MY Ford Transit T250 Medium Roof 130" WB units, delivered to SELLER'S identified dealership Q2 2023.
- 1.2 All references to Seller and/or BUYER in this SOW will be deemed to include their respective subsidiaries, if any, and SELLER and BUYER may be referred to in this SOW as a "Party" and together as the "Parties". For the purposes of this SOW, and following subsidiaries are involved:
  - [SELLER's subsidiary, if any]
  - [BUYER's subsidiary, if any]





#### BRINK'S INCORPORATED

DocuSigned by:	
Senior Director, S	trategic Sourcing

#### CITE ARMORED, INC.



B.2 – Drawings & Specifications – PO#

#### Specifications:

Item Description		Item Details	Quantity
General/Body Requirements			
Ballistic Level			
Doors			
	Driver Door		
			_
Door Hardware			
			l
			_

		(6)	
Windows			
Insulation & Climate Control			
Insulation			
HVAC system			
	Driver compartment		
	HVAC system		
	Cargo compartment		
	HVAC system		
Paint/Decals			
Exterior Finish			
	Van exterior wall		
	Underbody		
	Front bumper	_	
	Rear bumper	_	
	Wheels		
Internal finish			
	Interior wall		
	(armored)		
	Interior wall		
	(unarmored)		
	(unurnorcu)		
	Interior floor		
	Client Proprietary		
	Decals (Brinks decals		
	and labels)		

Security, locks, and interlock		
Door opening system		
	-	
	-	-
	-	
	-	
	e	
		_

	Interlock system	per drawing	
Keyless Entry System (Prox fob)			
		Self contained with white covers.	
		For door opening	
			<u> </u>
Hardware Security Features			
BDI/Remote System			<u> </u>
Software Security Features			+
			1
	Geofencing		1
	1		

Surveillance			
		· · · · · · · · · · · · · · · · · · ·	
Lighting			
Exterior Lighting			
	All exterior lights	OFM	
	The CALE HOL HELLS		

Interior Lighting	
Dome Lights	5
Road Safety System &	
Equipment	
Exterior Equipment	
	_
Interior Equipment	
Electrical System and	
components	

	-	
	-	
	- -	
	-	-
	-	
	-	

#### Drawings:











#### Schedule B.3 - PURCHASE ORDER #

#### April 12, 2023

This Purchase Order # is entered into between **BRINKS**, **INCORPORATED** and **CITE ARMORED**, **INC.** on this 12th DAY of April 2023 in relation to SOW # and is part of and incorporated into the Master Sales Agreement between the PARTIES dated August 1, 2022. This Purchase **Order # and is part of and incorporated to AAN #** 

This Purchase Order # will (supersede/be in addition to) any current or past Purchase Order entered into between the PARTIES in accordance with the above-named Master Sales Agreement and SOW:

Quantity of the order:

- 76 Ford 2023MY Ford Transits T-250 Mid-Roof, upfitted at a price of **Sector** per unit. Total commitment of order is **Sector** (USD), which is exclusive of inbound chassis transportation, taxes, tags, titling, registration fees, and outbound transportation to Brink's Inc destination to be defined.
- •
- At the discretion of Brink's Inc, the potential for additional upfits may be allocated upon successful completion of the original quantity listed above.

Completion Date/Delivery Schedule of the Goods:

- First twelve (12) units to be completed by May 31, 2023, with future units completed as defined in Schedule B.5 # Production Schedule.
- If the promised work completion date is not met for reasons within CITE's control, CITE agrees
   penalty to Bri

Confirmation for release of the Goods:

INCOTERM Protocol (if different from default Protocol in the Master Sales Agreement): **EXW** 

Chassis Procurement Protocol: Chassis delivered.

All other terms and conditions set forth in the Master Sales Agreement and relevant SOW will apply, including, but not limited to, terms of payment and pricing details.

BRINK'S, INC

#### CITE ARMORED, INC.



#### Schedule B.5 Production Schedule #

2023 Production Schedule for 2023MY Ford Transit				Build Qua	nties per Mo	nth			
Builder	May	June	July	August	Sept	Oct	Nov	Dec	Total
CITE <sup>(2)</sup>	12	12	12	12	12	12	4	0	76
									76
Unit Build by Month:	12	12	12	12	12	12	4	0	
otes:									
2) Unit deliveries noted are based off of production schedule provided	by builders du	ring RFQ							

# EXHIBIT B-PART 1

#### PURCHASE ORDER # August 10, 2023

This Purchase Order (PO) **# 1000 is entered into between BRINK'S, INCORPORATED** ("Brink's") and **IDLE SMART, INC.** ("Idle Smart") on this **10<sup>th</sup> DAY of AUGUST 2023.** This PO **# 1000 methades** includes:

- Thirty (30) Idle Smart Technology units to be built and delivered to 652 Kent Ave, Brooklyn, NY 11249, with delivery beginning as soon as possible. Pricing: \$\_\_\_\_\_ per unit / Extended value \$\_\_\_\_\_ USD, not including shipping.
- Idle Smart to invoice **\$ 1000** or initial devices, plus shipping, upon shipment. Payment to Idle Smart by Brink's required via ACH in accordance with the terms of the Master Services Agreement dated July 24, 2023 (the "Agreement").
- The technology requires \_\_\_\_\_\_, invoiced \_\_\_
- Devices will be installed on the attached list of VINs. Brink's reserves the right to remove devices and reinstall on other vehicles at Brink's discretion; however, Brink's will notify Idle Smart with updated vehicle information upon reinstallation.

Acceptance criteria:

- Devices must be built consistent with the demonstration inspected and approved by Brink's. Should any dispute arise during the course of the Agreement, the demonstration vehicle shall serve as the comparative vehicle to resolve said dispute.
- Warranty/Service technical guidance included for service/repair calls for the duration of the subscription at no additional cost to Brink's or any of its affiliates unless the call is because of Brink's personnel failing to follow user instructions.
- Detailed, professional wiring diagrams (color coded or numbered) will be included at no additional cost to Brink's or any of its affiliates.

#### INCOTERM Protocol **EXW**

Both parties have read and understood the terms and conditions of this purchase order.

IDLE SMART, INC. DocuSigned by:	BRINK'S, INCORPORATED
TITLE: Vice President	
DATE: 8/11/2023   12:46 PM PDT	DATE: 8/12/2023   10:04 AM PDT

Purchase Order - VIN List for initial order

## EXHIBIT B-PART 2

#### STATEMENT OF WORK #

- 1.1 This Statement of Work (hereinafter, "SOW") will confirm the mutual understanding and agreement between IDLE SMART, INC. ("SELLER") and BRINK'S INCORPORATED ("BUYER") as to the terms and conditions pursuant to which SELLER, itself and through its direct and indirect subsidiaries and/or agents, will provide the Goods and/or Services described in this SOW to BUYER:
  - The purchase of Idle Smart modular devices, that automatically engage engine start stop solution by using the vehicle's engine and existing HVAC to heat and cool the cabin, charge batteries, and warm engine and fuel lines.
  - Pricing for Idle Smart modular devices shall be set as follows and shall remain during the term of this SOW:
    - One-time fee of **\$ \_\_\_\_** per device, including installation.
    - Monthly software subscription for 1 100 units at a rate of \$ per device.
    - Monthly software services shall begin once devices have been installed and become active within Idle Smart's portal. Estimated go live date is August 28<sup>th</sup>, 2023.
- 1.2 All references to SELLER and/or BUYER in this SOW will be deemed to include their respective subsidiaries, if any, and SELLER and BUYER may be referred to in this SOW as a "Party" and together as the "Parties". For the purposes of this SOW, the following subsidiaries are involved:
  - Brink's Global Services USA, Inc.
- 1.3 The terms and conditions of this SOW are as follows:
  - (i) This SOW is entered into by the Parties under the provisions of that certain Master Services Agreement, dated July 24, 2023, between SELLER and BUYER (the "Master Agreement"), and, except as otherwise provided in this SOW, all applicable provisions of the Master Agreement are incorporated into this SOW by this reference;
  - (ii) The term of this SOW will commence on July 24, 2023, and, unless earlier terminated as provided in the Agreement or this SOW, will expire on December 31, 2026; provided, however, that the term of this SOW may be extended as provided in the Master Services Agreement;
  - (iii) During the term of this SOW, SELLER will provide to BUYER the Goods and/or Services described in this SOW pursuant to Purchase Order #
  - (iv) In connection with the Goods and/or Services provided by SELLER under this SOW, BUYER will:
    - (A) Appoint the required representatives for this SOW;
    - (B) Provide to SELLER the technology, including hardware and software, described in this SOW pursuant to the Agreement, unless specifically agreed otherwise hereunder;
    - (C) Pay to SELLER the amounts specified in the attached Purchase Order # to this SOW upon successful performance of the Services;
  - (v) In connection with the Goods and/or Services provided by SELLER under this SOW, SELLER will:
    - (A) Appoint the required representatives for this SOW;

    - (C) Commit to, and honor, the warranties described in the attached Purchase Order # and Master Services Agreement.
  - (vi) Additional terms and conditions related to the Goods and/or Services covered by this SOW are set forth in the attached Purchase Order # \_\_\_\_\_ are hereby incorporated by reference.

Both parties have read and understood the terms and conditions of this SOW.

#### **BRINK'S INCORPORATED**



TITLE: Vice President

DATE: 8/11/2023 | 12:46 PM PDT

#### **IDLE SMART, INC**



TITLE: Vice President, Fleet Operations

DATE: \_\_\_\_\_\_ 10:04 AM PDT

# EXHIBIT C

### **Lease Order Form**

Date: July 13th, 2023 7Gen Project Number:



LESSEE		LESSOR				
Client Legal Name: Brink's USA Enterprise Identification number: (required for incentives application) Address:		7 Generation USA Inc. EIN:				
		Address: 8 The Green, STE 300 Dover, DE 19901 USA				
Name:				Name:		
Phone: Email:				Phone: +1 Email:		
LEASED VEHICLES						
7Gen #	Year	Make	Model, Trim, Battery Size		Delivery Location	Expected Delivery Date
TBD	2023	Ford	E-Transit, medium roof,	wheelbase, kWh	New York, NY, USA	TBD
Inclusions: - Inclusions: - Inclusions: Inclusion						

LEASE DETAILS				
Quantity of Vehicles	35			
	88			
T				
*				
State of Registration <sup>4</sup>	New York			

7 Generation USA Inc. EIN: 8 The Green, STE 300 Dover, DE 19901, USA www.7gen.com

### Lease Order Form

Date: July 13th, 2023 7Gen Project Number:



LEASE ORDER TERMS				
DATED:				
Lessee	Lessor			
	7 Generation USA Inc.			
Authorized Circutures				
Authonized Signatures:	Authorized Signatures:			
Name:	Name:			
Date:	Date:			

## EXHIBIT D



#### LOCATION ORDER - Brinks USA CHARGER STATION AND SPECIFICATIONS

Date of the Location Order	July 13th, 2023	
Site Address	652 Kent Ave, Brooklyn, NY 11249	
Quantity of Chargers	39	
Charger Model(s) #	Level W single and dual port chargers or equivalent <sup>1</sup>	

This budgetary proposal is meant to support a discussion on the business relationship between Brinks USA and 7Gen. 7Gen will provide a firm offer after confirmation of conceptual site designs, final installation & infrastructure costs, negotiations with suppliers, installation contractors and its lending partners. T

#### **SCOPE OF WORK**



7 Generation USA Inc. EIN:

8 The Green, STE 300, Dover, DE 19901 USA





<sup>&</sup>lt;sup>2</sup> Additional civil works, landscaping, sidewalk and water repair are not included in current scope to be agreed with Safex



5. Conditions	
Exclusions (or at extra costs to be assessed)	
Assumptions	

#### **ESTIMATED TIMELINE**

Project timeline may vary due to supply chain and material shortage.

#### **Project Start Date**

**Tentative Timeline** 

Upon signature of present Location Order and receipt of down payment

- 1 month awarding, payment, drawings prep
- 2-3 month permits
- 3-5 month procurement of material
- 2-3 month construction on site
- 2 weeks commissioning and testing
- Total: ~ 8-12 months



#### FEES & TERM (preliminary)



#### **TERMS & CONDITIONS**



#### [Terms & Conditions page continued on next page]





#### **SIGNATURES**

**Brinks USA** 

7 Generation USA Inc.







#### 1. When should the chargers be operational?

The projected new timeline for completion will be 4-6 months (the project is estimated to be completed by April 2024-June 2024).

This estimated timeline and the scope of work are subject to change based on the final site assessment, any unforeseen challenges, and real-time project developments.

#### 2. What are the permits that must be obtained, and from what entities?

Our contractors will work with the local municipal government authorities in Brooklyn to obtain building and electrical permits. These permits will ensure that the construction complies with local building and electrical codes, NEC and other regulations, and safety standards.

Some other permits that were not considered currently as part of this scope, but might be required to obtain are environmental permits, and structural & geotechnical permits. A detailed on-site visit and land-use agreement review is required to ensure 7Gen can capture these requirements.

#### 3. What materials must be procured?

In our experience, permitting timelines and requests for additional EV services from the utility are contingent on local authorities approvals, often ranging between 1-3 months and subject to factors beyond 7Gen's direct control. To expedite these processes, 7Gen collaborates with local partners with a proven track record in deploying projects in the region, leveraging established relationships to potentially accelerate approval timelines.

Project timelines are significantly influenced by the issuance date of the purchase order, crucial for securing materials and construction labor. Certain electrical distribution equipment, such as transformers and electric panels, may have varying timelines of 3-6 months. However, 7Gen, upon issuance of a purchase order, can expedite deliveries through local distributors, reducing waiting times. Notably, site mobilization and preliminary construction activities can commence early, allowing progress while awaiting material arrivals, ensuring an optimized and efficient project timeline.

#### 4. What construction is occurring and how long does it take?

As a next step, engineering drawings are required to demonstrate full installation and construction details. The drawings will outline the exact EV charger and EV charging supply equipment locations, cable routing, and any civil works that are required, such as trenching, paving and installation of protection devices.



Timelines are dependent on:

- 1. The process of obtaining necessary permits and ensuring EV services (if needed) are in place;
- 2. Securing landlord consent, according to local requirements;
- Material delivery timelines are contingent on supply chains. However, please note we may have the flexibility to expedite deliveries based on the issuance date of the Purchase Order (PO). The timelines here are closely tied to regulatory approvals;
- 4. Local coordination with Brinks staff to support on any site clean-up, shutdown schedule and any internal coordination that may be required in the construction area.



Example of an overhead charging infrastructure (for illustrative purpose only)

# EXHIBIT E





By providing your signature, you are approving that all information and artwork in the above design is correct, accurate, and ready for printing and installation. **CUSTOMER SIGNATURE** Design: 015688-1 Option #: A Rev #: XXX WHEELBASE: 148 DOOR: CS Slide COLOR: XXXX WINDOW: No Glass ROOF: Medium **MODEL: Transit** YEAR: 2023 MAKE: Ford cuent name: Brink's US -Idle Reduction Technology DESIGNER: ≿ 07/12/2023 DATE: FINAL PROOF DIST

Please check information to confirm accurate vehicle specifications.



DIST

By providing your signature, you are approving that all information and artwork in the above design is correct, accurate, and ready for printing and installation.

**CUSTOMER SIGNATURE** 

Option #: B Rev #: XXX

Please check information to confirm accurate vehicle specifications.

Design: 015688-1

WHEELBASE: 148

COLOR: XXXX

DOOR: CS Slide

WINDOW: No Glass

ROOF: Medium TRIM: XXXX

> **MODEL: Transit** YEAR: 2023

> > DESIGNER:

≿

07/12/2023

FINAL PROOF

DATE:

MAKE: Ford



By providing your signature, you are approving that all information and artwork in the above design is correct, accurate, and ready for printing and installation. If you approve the above artwork, please sign below. **CUSTOMER SIGNATURE** Design: 015688-1 Option #: C Rev #: XX WHEELBASE: 148 Please check information to confirm accurate vehicle specifications. DOOR: CS Slide COLOR: XXXX WINDOW: No Glass ROOF: Medium TRIM: XXXX **MODEL: Transit** YEAR: 2023 MAKE: Ford cuent name: Brink's US -Idle Reduction Technology DESIGNER: ≿ 07/12/2023 DATE: FINAL PROOF DIST



By providing your signature, you are approving that all information and artwork in the above design is correct, accurate, and ready for printing and installation. If you approve the above artwork, please sign below. **CUSTOMER SIGNATURE** Design: 015688-1 Option #: D Rev #: XX WHEELBASE: 148 Please check information to confirm accurate vehicle specifications. DOOR: CS Slide COLOR: XXXX WINDOW: No Glass ROOF: Medium TRIM: XXXX **MODEL: Transit** YEAR: 2023 MAKE: Ford cuent name: Brink's US -Idle Reduction Technology DESIGNER: ≿ 07/12/2023 DATE: FINAL PROOF DIST

