

Public Comments Sent to PPB@mocs.nyc.gov

From: [Tanjila Rahman](#)
To: [PPB](#)
Subject: [EXTERNAL] Question regarding Proposed Amendment of Rules Governing Minority and Women Owned Business Enterprise Noncompetitive Small Purchase Mechanism
Date: Friday, March 10, 2023 1:11:34 PM
Attachments: [MOCS Proposed Amendment re MWBE Noncompetitive Small Purchase Mechanism - Preliminarily Certified - 3.6.23.pdf](#)

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Good Afternoon,

I'm reaching out from Pitta Bishop and Del Giorno LLC regarding the Procurement Policy Board (PPB)'s upcoming rules hearing: Proposed Amendment of Rules Governing Minority and Women Owned Business Enterprise Noncompetitive Small Purchase Mechanism. We wanted to get additional clarity and correct interpretation for this amendment.

Is this amendment written to address section 2 the omitting of non-minority woman owned (white woman owned) and Asian male companies from participating with the 0 to 500,000 dollar spend. Please let us know. Thank you.

<https://www.nyc.gov/office-of-the-mayor/news/026-002/executive-order-26#:~:text=All%20mayoral%20agencies%20shall%2C%20whenever,American%20M%2FWBEs%20and%20Asian>

§ 2. All mayoral agencies shall, whenever practicable, use their discretion under section 311(i) of the New York City Charter to limit the pool of solicited vendors for goods, services and construction for amounts not exceeding \$500,000 to Black American M/WBEs, Hispanic American M/WBEs, Native American M/WBEs and Asian American WBEs. The Mayor's Office of Minority and Women-Owned Business Enterprises ("OM/WBE") shall issue guidance on the process of prioritizing, where practicable, these most underutilized categories of M/WBEs for such solicitations

Procurement Policy Board is proposing changes to the PPB Rules to align the dollar threshold of the Minority and Women Owned Business Enterprise Noncompetitive Small Purchase Mechanism with recent changes to the New York City Charter.

TITLE: Proposed Amendment of Rules Governing Minority and Women Owned Business Enterprise Noncompetitive Small Purchase Mechanism

Agency Rules

Section

Procurement Policy Board (PPB)

Agency Name

255 Greenwich Street

New York, NY 10007

Event Location

4/14/2023 1:00 PM

Event Date and Time

Tanjila Rahman
Senior Government Relations Specialist
Pitta Bishop & Del Giorno LLC
120 Broadway, 28th Floor
New York, NY 10271
trahman@pittabishop.com
Desk: (212) 652-3886

From: e.reda
To: [PPB](#)
Subject: [EXTERNAL] Amendment to M/WBE Noncompetitive Small Purchase Dollar Amount Threshold
Date: Monday, March 20, 2023 9:35:32 PM
Attachments: [ATT00002.png](#)

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Hello,

I would like comment on the proposed rules of the Amendment to M/WBE Noncompetitive Small Purchase Dollar Amount Threshold.

I agree that the new proposed threshold will help with getting closer to the goals that the City has on increasing its MWBE spend. I'm in agreement with this new amendment.

Warm regards,

Ellie Reda

CEO

"We help bridge the gap between IT demands and Business success. We're here for you!"

www.StratfordSolutionsInc.com

Phone 732-241-2929



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From: [Francilia Wilkins](#)
To: [PPB](#)
Subject: [EXTERNAL] PPB 3-08 Request to Speak and Letter of Support PPB 3-08
Date: Friday, April 14, 2023 12:41:13 PM

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 [NYC Black Business Support PPB 3-08 RFW .pdf](#)

Good Afternoon,

Attached is a letter of support from R.F. Wilkins Consultants for PPB 3-08. I am also requesting the ability to speak during today's hearing. Thank you

Francilia Wilkins Rahim, MBA | Chief Executive Officer | R. F. Wilkins Consultants, Inc.

O: (212) 381-7488 ext. 701 | **M:** (401) 447-2257 | **E:** FWilkins@rfwconsultants.com

F: (917) 725 - 8219: | **W:** www.rfwconsultants.com

"Your Business Development and Expansion Partner"



R.F. Wilkins Consultants, Inc. is a New York-based Business Development and Management Consulting Firm. We partner with non-profits, small businesses, government agencies, and corporations to meet their development and expansion needs. Services under our umbrella include project management, technology systems integration, fundraising and capital sourcing, technical assistance, stakeholder engagement, and compliance. We look forward to working with you to create affordable and comprehensive solutions for your business.

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April 12, 2023

Attn: New York City Policy Procurement Board

The following letter is in support of the updates to the Minority and Women-Owned Business Enterprise (M/WBE) Noncompetitive Small Purchase procurement method set forth in Procurement Policy Board (PPB) Rule § 3-08.

In 2022, \$43 Billion in contracts were procured by New York City. Only 15% of this total spend was subject to MWBE participation goals with M/WBE's accounting for only 2% of the value of all new city contracts and purchase orders. Black and Hispanic MWBE's represent less than 2% of the value of contracts subject to local law 174 goals while over 70% of the value of MWBE contracts awarded have gone to White women and Asian Men.

Black and Hispanic companies continue to represent the disparity in the disparity, and this is unacceptable. Our companies cannot sustain without access to real opportunities. When Black businesses win contracts, Black workforce scales, Black people build wealth, Black communities thrive, and Black youth prosper.

Procurement represents 20% of our nation's gross domestic product. In New York City, our nation's most diverse city, the numbers continue to highlight the undervaluing and lack of access faced by Black businesses. Approval of the proposed updates to PPB rule 3-08 serve as a pivotal next step towards shattering barriers and creating more opportunities for participation. Next, we must ensure and scale compliance efforts surrounding the implementation of these policies and timely payment to these firms. Small businesses are the fabric of this City, we are its economic engine. To ensure all New Yorkers prosper, this, and like policies must prevail.

Sincerely,

A handwritten signature in black ink, appearing to read 'Francilia Wilkins Rahim', written over a horizontal line.

Francilia Wilkins Rahim
Chief Executive Officer
R.F. Wilkins Consultants

From: [Erika Hill](#)
To: [PPB](#)
Subject: [EXTERNAL] Amendment to M/WBE Noncompetitive Small Purchase Dollar Amount Threshold
Date: Friday, April 14, 2023 12:45:12 PM

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Good afternoon,

I believe there should be an increase for more participation for black and brown firms (MBEs).

Thank you
Erika

--

Erika Hill
CEO
Vision Street Research
"Providing Research That Impacts Communities"

516-341-2357

ehill@visionstreetresearch.com

www.visionstreetresearch.com

PROUD MEMBER OF U.S. COALITION OF BLACK WOMEN BUSINESSES AND
BALDWIN CHAMBER OF COMMERCE

From: [Andreene Campbell](#)
To: [PPB](#)
Cc: [Andrew Simmons](#)
Subject: [EXTERNAL] Letter of Support PPB-08 - Lashay's Construction
Date: Friday, April 14, 2023 12:49:39 PM
Attachments: [Lashays Construction - 04.14.23.pdf](#)

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Good Afternoon,

Please see the attached letter for your review.

Thank you

--

Best Regards,
Andreene Campbell
Chief of Staff

Lashay's Construction & Development Co., Inc

92 Main St, Suite 206
Yonkers, New York 10701
Tel: [914-207-0463](tel:914-207-0463)

Cell: [347-998-6935](tel:347-998-6935)

Fax: [914-207-0464](tel:914-207-0464)

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April 14, 2023

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Black and Hispanic companies continue to represent the disparity in the disparity, and this is unacceptable. Our companies cannot sustain growth without access to real opportunities. When Black businesses win contracts, Black workforce scales, Black people build wealth, Black communities thrive, and Black youth prosper.

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Sincerely,

A handwritten signature in black ink, appearing to read 'AS', written over a horizontal line.

Andrew Simmons
President
Lashay's Construction & Development Co., Inc

From: [Andreene Campbell](#)
To: [PPB](#)
Cc: [Andrew Simmons](#)
Subject: [EXTERNAL] Letter of Support PPB-08 - A&S Rebar, Inc
Date: Friday, April 14, 2023 12:50:27 PM
Attachments: [A&S Rebar, Inc - 04.14.23.pdf](#)

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Good Afternoon,

Please see the attached letter for your review.

Thank you

--

Best Regards,
Andreene Campbell
Chief of Staff

[A&S Rebar, Inc](#)
205 Sills Road
Yaphank, NY 11980
Tel: [914-207-0463](tel:914-207-0463)
Cell: 347-998-6935
Fax: [914-207-0464](tel:914-207-0464)

April 14, 2023

Attn: New York City Policy Procurement Board

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Sincerely,

A handwritten signature in black ink, appearing to read 'AS', written over a light blue horizontal line.

Andrew Simmons
President
A&S Rebar, Inc

From: [Garry Johnson](#)
To: [PPB](#)
Subject: [EXTERNAL] NAACP Comments and Letter for PPB Rule Change 3-08
Date: Friday, April 14, 2023 1:09:59 PM
Attachments: [NAACP NY Conference Statement of 4-14-2023 Public Hearing re PPB Rule 3-08.pdf](#)

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Please see attached and submit for the record.

Garry Anthony Johnson
NAACP New York State Conference
Economic Development Chairman

44 Wall Street, Suite 604
New York, NY 10005
T: 212.344.7474 x108
F: 212.344.4447
M: 646.235.6316
GarryAJohnson@gmail.com



April 14, 2023

New York City is the most diverse city in the nation, yet we're entrenched in a mindset that seemingly intentionally ignores the capabilities of Black and Latino firms who are in fact ready, willing and capable of doing more work with the city of New York. Current practices have created a clear disparity within the disparity of MWBE structures. We don't need more studies and we certainly don't need additional mentorships by white firms, whether male or female run. Economic empowerment is a Civil Right and the NAACP New York State Conference intends to ensure that it is recognized as such.

Asian men and White women receive more than 70% of the contract value of all contracts within the MWBE programs. This must end. This proposed rule change will increase the opportunities for Black and Latino firms, and anything less is an insult to the demographic composition of New York City and the tax base that continues to support all government spending.

We support the rule change to allow agencies to use the M/WBE Noncompetitive Small Purchase mechanism to make purchases not in excess of \$1,000,000, in order to address the continuing effects of discrimination on M/WBEs in the market where the City conducts its procurements; and (2) to allow the PPB Rules to automatically align with the dollar threshold featured in the Charter, in the event of any future statutory changes to such threshold.

This proposed rule amendment would exercise authority granted to the City by Chapter 569 of the Laws of 2022 and codified in section 311(i)(1) of the Charter.

Garry Anthony Johnson,

NAACP New York State Conference, Economic Development Chair

From: [Wayne Allen](#)
To: [PPB](#)
Subject: [EXTERNAL] Re: Procurement Policy Board (PPB) Rule § 3-08.
Date: Friday, April 14, 2023 1:21:50 PM

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To whom it may concern,

I am in support of the updates to the Minority and Women-Owned Business Enterprise (M/WBE) Noncompetitive Small Purchase procurement method set forth in Procurement Policy Board (PPB) Rule § 3-08.

In 2022, \$43 Billion in contracts were procured by New York City. Only 15% of this total spend was subject to MWBE participation goals with M/WBE's accounting for only 2% of the value of **all** new city contracts and purchase orders. Black and Hispanic MWBE's represent less than 2% of the value of contracts subject to local law 174 goals while over 70% of the value of MWBE contracts awarded have gone to White women and Asian Men.

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Thanks!

Wayne Allen, PE
President
W. Allen Engineering, PLLC
Direct: 917-295-8275 | wallenengineering.com
Follow us on LinkedIn: <https://www.linkedin.com/company-beta/5218425>



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From: e.reda
To: [PPB](#)
Subject: [EXTERNAL] Support to increase dollar spend
Date: Friday, April 14, 2023 1:27:01 PM
Attachments: [ATT00002.png](#)

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Hello Committee,

I'm writing today to support the increase in the dollar spend for Black and Hispanic firms (MWBE).

Ellie Reda, CEO from Stratford Solutions Inc.

Please
Warm regards,

Ellie Reda

CEO

"We help bridge the gap between IT demands and Business success. We're here for you!"

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From: [Brian Ansari](#)
To: [PPB](#)
Subject: [EXTERNAL] Letter of support of PPB Rule 3-08
Date: Friday, April 14, 2023 1:39:09 PM
Attachments: [Letter to NYC PPB.pdf](#)

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Please find the attached letter of support.

Thank you

Brian

Brian Ansari
President
BrianAnsari and Associates Inc.
89 Market St
4th Fl
Newark, NJ 07102
518-221-4210
www.bansarisolutions.com



April 14, 2023

To Whom It May Concern:

BrianAnsari and Associates Inc. is in support of the updates to the Minority and Women-Owned Business Enterprise (M/WBE) Noncompetitive Small Purchase procurement method set forth in Procurement Policy Board (PPB) Rule § 3-08.

In 2022, \$43 Billion in contracts were procured by New York City. Only 15% of this total spend was subject to MWBE participation goals with M/WBE's accounting for only 2% of the value of all new city contracts and purchase orders. Black and Hispanic MWBE's represent less than 2% of the value of contracts subject to local law 174 goals while over 70% of the value of MWBE contracts awarded have gone to White women and Asian Men.

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Thanks!

Warm Regards,

A handwritten signature in black ink, appearing to be 'BA' with a stylized flourish.

Brian Ansari

President

BrianAnsari and Associates Inc.

www.bansarisolutions.com

brian@bansarisolutions.com

518-221-4210

www.bansarisolutions.com

8175 E. Evans Rd, #13612, Scottsdale, AZ 85267

518-221-4210

89 Market St, 4th Fl, Newark, NJ 07102

From: [President of the U.S. Coalition](#)
To: [PPB](#)
Subject: [EXTERNAL] NYC MOCS Public Hearing
Date: Friday, April 14, 2023 1:43:34 PM

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Thanks!

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Sincerely,

Deidre Helberg

President

Phone: 1 888 409-7010

Email: president@uscbwb.org

Daidre Helberg
Founder and President

+1 516-868-8028 Ext 1000
+1 888 409-7010
+1 646-679-8611

✉ president@uscbwb.org

🌐 www.uscbwb.org

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From: [Iam Tucker](#)
To: [PPB](#)
Cc: [julie harris](#)
Subject: [EXTERNAL] Submitting my Support for Amendment to PPB - Rule 3-08
Date: Friday, April 14, 2023 1:47:31 PM
Attachments: [Outlook-dcobppdq.png](#)

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My name is Iam C Tucker, and I am the 2nd generation owner of an Integrated Logistical Support Inc. (ILSI Engineering).

Next year will make 30 years in business for us, and from my father's 15 years of company leadership and in my 14 years, we continue to strive to be a part of a 2% participation rate at public agencies across the nation.

This isn't a lack of hustle problem, this isn't a lack of qualifications problem, this isn't a lack of personnel or experience problem. This is a systemic and systematic problem with agencies that somehow cannot see the same value in the work of black and brown businesses as they do in majority companies.

You do not need my testimony to prove this, you have the statistics and proof in publicly paid for disparity studies. The statistics are very clear. The very people that these MWBE programs were designed for are STILL not benefitting from them. Somehow the same problems continue to exist, and the programs meant to level the playing field for blacks and brown folks are being successfully exploited by the same folks who already had a seat at the contracting table and at the economic table. Agencies and NGO's continue to promote the need for us to be ready, the need for blacks to open businesses, the need for us to have access to capital, the constant need for us to "Be Ready!"

Where is that same push for readiness and for diversity and for accountability with the gatekeepers and decision makers who continue to choose the same folks over and over and over again?

Who holds the gatekeepers accountable?

Who examines the contracting officers and agency leaders who continue to not acknowledge nor see our qualifications?

Why is that I am qualified for so many highly technical jobs as a prime at various federal agencies, but somehow my company is not able to be a viable competitor on less complicated, smaller dollar value, smaller sized jobs with certain local agencies?

The answer doesn't lie with the companies like mine, the answer lies within the agencies that have & continue to prove their unwillingness to work with black and brown people. Again, This isn't opinion, it is statistical fact. It's not only in New York either, this is a problem nationwide. This nationwide problem is EXACTLY WHY THESE PROGRAMS EXIST.

These programs cannot & will not be successful until the decision makers are held to account as much as we are.

We will never move the needle on these numbers if we are never seen for our experience, our value, or our successes over our race.


The most shameful part of this is the 'haves' fighting to ensure the 'have-nots' continue to have none.

While the companies that are thriving in MWBE programs are fighting against us even getting the 2% that we are currently getting, or rather the 98% of what we AREN'T getting access to.... it's proof positive of the need for this rule.

Thank you for the opportunity to submit comments.

Most respectfully submitted,

ICT



ILSI
ENGINEERING

Iam Christian Tucker
—
President/CEO/Owner
4298 Elysian Fields Ave. - Suite B
504.909.9403
iamtucker@ilsiengineering.com
www.ilsiengineering.com

Minority Owned.
Woman Owned.
8(a) Certified.

Diverse Experience. Diverse Projects. Diverse People.

From: [Ernst Fleuranvil](#)
To: [PPB](#)
Subject: [EXTERNAL] Minority and Women-Owned Business Enterprise (M/WBE)
Date: Friday, April 14, 2023 1:47:59 PM

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Thanks!

Ernst Fleuranvil, P.E.
President/CEO
Excelsior Engineering Services P.C.
560 Sylvan Avenue, Ste 1320
Englewood Cliffs, NJ 07632
Tel: [201-880-7513](tel:201-880-7513)
Fax: [201-880-7516](tel:201-880-7516)
Cell: 347-339-6688
Office email: info@eengs.com
www.eengs.com

From: [President of the U.S. Coalition](#)
To: [PPB](#)
Cc: [VP](#); [Vpne](#)
Subject: [EXTERNAL] NYC MOCS Public Hearing
Date: Friday, April 14, 2023 1:46:50 PM

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Thanks!

--
Sincerely,

Deidre Helberg

President

Phone: 1 888 409-7010

Email: president@uscbwb.org

Daidre Helberg
Founder and President

+1 516-868-8028 Ext 1000
+1 888 409-7010
+1 646-679-8611

✉ president@uscbwb.org

🌐 www.uscbwb.org

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OF BLACK WOMEN BUSINESSES
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From: [Arnold Baker](#)
To: [PPB](#)
Subject: [EXTERNAL] Procurement Policy Board (PPB) Rule § 3-08.
Date: Friday, April 14, 2023 1:54:44 PM

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Date: April 14, 2023

To: New York City Leadership (ppb@mocs.nyc.gov)

From: Arnold Baker, BRM Concrete & Black Marlin Marine Engineering Group

Re: Procurement Policy Board (PPB) Rule § 3-08

As a Black Entrepreneur, former Chairman of the National Black Chamber of Commerce, Port Chairman, Airport Commissioner, Railroad Commissioner, US Chamber of Commerce Director, United Nation's Delegate and founder of several state and city black chamber's of commerce - I am in support of the updates to the Minority and Women-Owned Business Enterprise (M/WBE) Noncompetitive Small Purchase procurement method set forth in Procurement Policy Board (PPB) Rule § 3-08.

Approval of the proposed updates to PPB rule 3-08 serves as a pivotal next step towards shattering barriers and creating more opportunities for participation, while positively impacting disenfranchised communities.

Black and Hispanic companies continue to represent the disparity in the disparity, and this should be unacceptable to responsible and responsive Americans. In 2022, of the \$43 Billion in contracts procured by New York City only 15% of this total spend was subject to MWBE participation goals with M/WBE's accounting for only 2% of the value of **all** new city contracts and purchase orders. Black and Hispanic MWBE's represent less than 2% of the value of contracts subject to local law 174 goals while over 70% of the value of MWBE contracts awarded have gone to White women and Asian Men. This is reflective of almost every major city in the US. Do we really have to wonder why the Black Male unemployment (BMU) rate is so high. Even across the South, the BMU rate is between 30% and 50% in most major urban centers.

Our companies cannot sustain growth without access to real opportunities and without real opportunities jobs cannot be realized in our communities. When Black businesses win contracts, Black workforce scales, Black people build wealth, Black communities thrive, and Black youth prosper. Crime and many of the social ills we face today are diminished or are completely mitigated.

We have an opportunity in New York City, our nation's most diverse city, to again make a difference and be the template of resolution for the entire country and those who aspire to achieve or collective greatness.

However, we must also ensure and scale compliance efforts surrounding the implementation of these policies and timely payment to these firms. We should never forget the irrefutable fact that small businesses are the fabric of this City, represent its greatest opportunity for growth in all sectors, and fuel the region's and the nation's economic engine.

To ensure that all New Yorkers prosper tomorrow, this, and like policies must prevail today!

Arnold Baker

BRM Concrete

Black Marlin Marine Engineering Group

From: [Andrew Simmons](#)
To: [Arnold Baker](#)
Cc: [PPB](#)
Subject: [EXTERNAL] Re: Procurement Policy Board (PPB) Rule § 3-08.
Date: Friday, April 14, 2023 2:15:57 PM

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Arnold, very good you sent in a letter also. Thanks



Virus-free. www.avast.com

On Fri, Apr 14, 2023 at 1:54 PM Arnold Baker <arnold@blackmarlinmarine.net> wrote:

Date: April 14, 2023

To: New York City Leadership (ppb@mocs.nyc.gov)

From: Arnold Baker, BRM Concrete & Black Marlin Marine Engineering Group

Re: Procurement Policy Board (PPB) Rule § 3-08

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Arnold Baker
BRM Concrete
Black Marlin Marine Engineering Group

--

Believe!

Andrew Simmons
Lashay's Construction & Development Co., Inc.
92 Main St, Suite 206
Yonkers, New York 10701
(P)914-290-2365
(F)914-207-0464
EMAIL: SIMMONS@LASHAYSCONSTRUCTION.COM
WEBSITE: LASHAYSCONSTRUCTION.COM

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From: [Regina Smith](#)
To: [PPB](#)
Subject: [EXTERNAL] HBA Support for PPB 3-08
Date: Friday, April 14, 2023 2:58:10 PM
Attachments: [NYC Black Businesses Support for PPB 3-08 Updates 1 - HBA 4 14 23.docx](#)

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Dear Sir/Madam:

Please see attached letter of support.

REGINA L. SMITH
Deputy Director for Special Projects
HARLEM BUSINESS ALLIANCE
Email: rsmith@hbany.org
Twitter: [@HBANY](#)
Facebook: [Harlem Business Alliance](#)

275 Lenox Avenue • NYC 10027 • P (212) 665-7010 • C (347) 346-3901 • hbany.org

April 14, 2023

Attn: New York City Policy Procurement Board

The following letter is in support of the updates to the Minority and Women-Owned Business Enterprise (M/WBE) Noncompetitive Small Purchase procurement method set forth in Procurement Policy Board (PPB) Rule § 3-08.

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Sincerely,

Regina L. Smith
Deputy Director of Special Projects
Harlem Business Alliance, Inc.

From: gswitzer@switzerpc.com
To: [PPB](#)
Subject: [EXTERNAL]
Date: Friday, April 14, 2023 3:13:38 PM

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Thanks!

Gregory T. Switzer, AIA, NOMA, NCARB

GSAPC

255 West 36th Street, Suite 401
New York, New York 10018
212-391-1519

Smart. Innovative. Results oriented.

From: [Kathy Martin](#)
To: [PPB](#)
Subject: [EXTERNAL] Black Business | Letter of Support PPB-08
Date: Friday, April 14, 2023 3:16:41 PM
Attachments: [2023.04.14 Letter of Support PPB-08.pdf](#)

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Please see attached, Letter.

Best Regards,

Kathy Martin, MBA, PMP, Manager - Business Operations

GRANT ENGINEERING & CONSTRUCTION GROUP, LLC

Corporate Office | Northern NJ | NYC

211 Warren Street, Suite 209

Newark, NJ 07103

P: 973-358-5020 | F: 732-377-8612

Central New Jersey Office

2604 Atlantic Avenue, Ste. 600

Wall, NJ 07719

P: 732-705-7373 | F: 732-377-8612

Website: www.grantecg.com

Twitter: [@GrantECG](https://twitter.com/GrantECG)

NEW JERSEY | ST. THOMAS, U.S.V.I |

April 14, 2023

To: ppb@mocs.nyc.gov

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Thanks!

More information can be found at the following links:

[Amendment to M/WBE Noncompetitive Small Purchase Dollar Amount Threshold – NYC Rules \(cityofnewyork.us\)](https://www.cityofnewyork.us/office-of-the-mayor/news/026-002/executive-order-26)

<https://www.nyc.gov/office-of-the-mayor/news/026-002/executive-order-26>

Respectfully Submitted,



Brian Grant, P.E.
Principal

From: [Anthony Antico](#)
To: [PPB](#)
Subject: [EXTERNAL] In regards to the MWBE discretionary fund increase to 1 million dollars
Date: Friday, April 14, 2023 5:20:29 PM

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NYC PPB;

Firstly, I would like to express my gratitude for the opportunity to address the board today. I am writing to voice my support for the proposed increase of MWBE discretionary funding to 1 million dollars, which will undoubtedly have a positive impact on MWBE spend within NYC.

However, I do have a concern regarding the impact of Executive Order 26 on the changes proposed by the Procurement Policy Board for the MWBE funding increase. As per Local Law 1, there are participation goals for MWBE firms in NYC. Unfortunately, Executive Order 26 has excluded Asian male-owned firms and non-minority woman-owned companies from participating in the 0 to 500k MWBE discretionary fund spending.

This policy raises questions about how definitions under Local Law 1 can be updated when they have been redefined through the aforementioned executive order. I work for ICP Inc., a woman-owned Information Technologies product and solution provider operating in NYC. In the IT space, women experience a significant disadvantage, and it has only been in recent years that we have seen success in the NYC procurement space.

While Executive Order 26 was put in place to help minority woman-owned firms that are getting the smallest percentage of the overall NYC spend, it inadvertently harms non-minority woman and Asian male-owned businesses as they are excluded from the 0 to 500k spend category. The IT space is a closed market business that requires significant investment in certifications, employees, access to capital dollars, and hiring top IT talent.

This executive order is shifting business to larger minority-owned firms who can afford to play in that space. My concern is that it may take business away from excellent non-minority women and Asian male-owned businesses that have worked hard to support the city's technological needs. Therefore, I would request you to consider a separate category for IT firms where we can all be united as MWBEs, not divided.

The reason behind seeing such a small percentage of minority woman owned firms receiving a larger percentage of the IT business is that there aren't a large amount of companies that can play in that space. SHI as an example is a 15billion dollar again female owned company. They can get business in the 0 to 500k space over my firm, something isn't right? Hence, I conclude that a separate category for IT firms would enable NYC-based businesses to compete on a level playing field. Thank you for your consideration, and I am available for further comments if necessary.

Sincerely,

Anthony Antico
VP Sales, ICP Inc
917 282 7822
aantico@icpcorp.com

From: [Barbara Kushner](#)
To: [PPB](#)
Subject: [EXTERNAL]
Date: Friday, April 14, 2023 6:46:14 PM
Attachments: [image001.png](#)
[Procurement Policy Board 3-08 Letter of Support from Armand Corp.pdf](#)
Importance: High

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Please see attached letter in support of PPB Rule 3-08.

Thank you,

Barbara Armand Kushner

President & CEO

Armand Corporation

1350 Broadway, Suite 1901

New York, New York 10018

(O) 212-542-4179 Ext 14

(M) 856-816-4556

www.armandcorp.com



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April 14, 2023

Via email: ppb@mocs.nyc.gov

Mayors Office of Contracts:

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Sincerely,

ARMAND CORPORATION

A handwritten signature in black ink, appearing to read "Barbara Armand Kushner", written over a white background.

Barbara Armand Kushner
President

New York
1350 Broadway
Suite 1901
New York, NY 10018
212.542.4179

New Jersey
One Port Center, Ste 507
2 Riverside Drive
Camden, NJ 08103
856.489.8200

Philadelphia
2 Logan Square
100 N. 18th Street, Ste 364
Philadelphia, PA 19104
215.825.7556

Florida
501 E. Las Olas Blvd.
Suite 300/200
Fort Lauderdale, FL 33301
754.206.6203

From: [Andrew Thompson](#)
To: [PPB](#)
Subject: [EXTERNAL]
Date: Monday, April 17, 2023 9:42:27 AM

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Andrew Thompson AIA NOMA LEED AP BD+C
ar212b@verizon.net

Public Comments Posted to NYC Rules

Amendment to M/WBE Noncompetitive Small Purchase Dollar Amount Threshold

 rules.cityofnewyork.us/rule/amendment-to-mwbe-noncompetitive-small-purchase-mechanism-dollar-threshold/

Rule status: Proposed

Agency: MOCS

Comment by date: April 14, 2023

Rule Full Text

MOCS-Proposed-Amendment-re-MWBE-Noncompetitive-Small-Purchase-Mechanism-Preliminarily-Certified-3.6.23.pdf

The Procurement Policy Board is proposing changes to its rules to align the dollar threshold of the Minority and Women Owned Business Enterprise Noncompetitive Small Purchase Mechanism with recent changes to the New York City Charter. The proposed rule would increase the dollar threshold for the M/WBE Noncompetitive Small Purchase mechanism to \$1,000,000.

Attendees who need reasonable accommodation for a disability such as a sign language translation should contact the agency by calling 1 (212) 298-0734 or emailing ppb@mocs.nyc.gov by **April 7, 2023**

Send comments by

- **Email:** ppb@mocs.nyc.gov
- **Mail:** Attn: Procurement Policy Board Mayor's Office of Contract Services, 255 Greenwich Room/Floor: 9th Floor ; New York, New York 10007

Public Hearings

Public Hearing

Date

April 14, 2023

1:00pm - 2:00pm EDT

Location

Connect Virtually

<https://tinyurl.com/56bfwpta>

Meeting Number: 2340 278 3380

Meeting Password: jjBS3PuAq23 (55273782 from phones) To join the public hearing via telephone, please dial:

+1-646-992-2010 United States Toll (New York City)

+1-408-418-9388 United States Toll

Access code: 234 027 83380

Disability Accommodation

Comments are now closed.

Online comments: 5

James Swint

Thank you for the consideration as this increase will help the many families of these MWBE firms, many of whom are woman and minorities themselves.

With Gratitude,

Comment added April 11, 2023 5:14pm

Yvette Richardson

I am in support of the updates to the Minority and Women-Owned Business Enterprise (M/WBE) Noncompetitive Small Purchase procurement method set forth in Procurement Policy Board (PPB) Rule § 3-08.

In 2022, \$43 Billion in contracts were procured by New York City. Only 15% of this total spend was subject to MWBE participation goals with M/WBE's accounting for only 2% of the value of all new city contracts and purchase orders. Black and Hispanic MWBE's represent less than 2% of the value of contracts subject to local law 174 goals while over 70% of the value of MWBE contracts awarded have gone to White women and Asian Men.

Black and Hispanic companies continue to represent the disparity in the disparity, and this is unacceptable. Our companies cannot sustain growth without access to real opportunities. When Black businesses win contracts, Black workforce scales, Black people build wealth, Black communities thrive, and Black youth prosper.

Procurement represents 20% of our nation's gross domestic product. In New York City, our nation's most diverse city, the numbers continue to highlight the undervaluing and lack of access faced by Black businesses. Approval of the proposed updates to PPB rule 3-08 serves as a pivotal next step towards shattering barriers and creating more opportunities for participation. Next, we must ensure and scale compliance efforts surrounding the implementation of these policies and timely payment to these firms. Small businesses are the fabric of this City, we are its economic engine. To ensure all New Yorkers prosper, this, and like policies must prevail.

Comment added April 14, 2023 1:18pm

Deidre Helberg

I am in support of the updates to the Minority and Women-Owned Business Enterprise (M/WBE) Noncompetitive Small Purchase procurement method set forth in Procurement Policy Board (PPB) Rule § 3-08.

In 2022, \$43 Billion in contracts were procured by New York City. Only 15% of this total spend was subject to MWBE participation goals with M/WBE's accounting for only 2% of the value of all new city contracts and purchase orders. Black and Hispanic MWBE's represent less than 2% of the value of contracts subject to local law 174 goals while over 70% of the value of MWBE contracts awarded have gone to White women and Asian Men.

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Thanks!

Comment added April 14, 2023 1:52pm

arnold baker

Date: April 14, 2023

To: New York City Leadership (ppb@mocs.nyc.gov)

From: Arnold Baker, BRM Concrete & Black Marlin Marine Engineering

Re: Procurement Policy Board (PPB) Rule § 3-08

As a Black Entrepreneur, former Chairman of the National Black Chamber of Commerce, Port Chairman, Airport Commissioner, Railroad Commissioner, US Chamber of Commerce Director, United Nation's Delegate and founder of several state and city black chamber's of commerce – I am in support of the updates to the Minority and Women-Owned Business Enterprise (M/WBE) Noncompetitive Small Purchase procurement method set forth in Procurement Policy Board (PPB) Rule § 3-08.

Approval of the proposed updates to PPB rule 3-08 serves as a pivotal next step towards shattering barriers and creating more opportunities for participation, while positively impacting disenfranchised communities.

Black and Hispanic companies continue to represent the disparity in the disparity, and this should be unacceptable to responsible and responsive Americans. In 2022, of the \$43 Billion in contracts procured by New York City only 15% of this total spend was subject to MWBE participation goals with M/WBE's accounting for only 2% of the value of all new city contracts and purchase orders. Black and Hispanic MWBE's represent less than 2% of the value of contracts subject to local law 174 goals while over 70% of the value of MWBE contracts awarded have gone to White women and Asian Men. This is reflective of almost every major city in the US. Do we really have to wonder why the Black Male unemployment (BMU) rate is so high. Even across the South, the BMU rate is between 30% and 50% in most major urban centers.

Our companies cannot sustain growth without access to real opportunities and without real opportunities jobs cannot be realized in our communities. When Black businesses win contracts, Black workforce scales, Black people build wealth, Black communities thrive, and Black youth prosper. Crime and many of the social ills we face today are diminished or are completely mitigated.

We have an opportunity in New York City, our nation's most diverse city, to again make a difference and be the template of resolution for the entire country and those who aspire to achieve or collective greatness.

However, we must also ensure and scale compliance efforts surrounding the implementation of these policies and timely payment to these firms. We should never forget the irrefutable fact that small businesses are the fabric of this City, represent its

greatest opportunity for growth in all sectors, and fuel the region's and the nation's economic engine.

To ensure that all New Yorkers prosper tomorrow, this, and like policies must prevail today!

Arnold Baker

BRM Concrete

Black Marlin Marine Engineering Group

Comment added April 14, 2023 1:58pm

Iam Christian Tucker

I am in support of the updates to the Minority and Women-Owned Business Enterprise (M/WBE) Noncompetitive Small Purchase procurement method set forth in Procurement Policy Board (PPB) Rule § 3-08.

My name is Iam C Tucker, and I am the 2nd generation owner of an Integrated Logistical Support Inc. (ILSI Engineering).

Next year will make 30 years in business for us, and from my father's 15 years of company leadership and in my 14 years, we continue to strive to be a part of a 2% participation rate at public agencies across the nation.

This isn't a lack of hustle problem, this isn't a lack of qualifications problem, this isn't a lack of personnel or experience problem. This is a systemic and systematic problem with agencies that somehow cannot see the same value in the work of black and brown businesses as they do in majority companies.

You do not need my testimony to prove this, you have the statistics and proof in publicly paid for disparity studies. The statistics are very clear. The very people that these MWBE programs were designed for are STILL not benefitting from them. Somehow the same problems continue to exist, and the programs meant to level the playing field for blacks and brown folks are being successfully exploited by the same folks who already had a seat at the contracting table and at the economic table. Agencies and NGO's continue to promote the need for us to be ready, the need for blacks to open businesses, the need for us to have access to capital, the constant need for us to "Be Ready!"

Where is that same push for readiness and for diversity and for accountability with the gatekeepers and decision makers who continue to choose the same folks over and over and over again?

Who holds the gatekeepers accountable?

Who examines the contracting officers and agency leaders who continue to not acknowledge nor see our qualifications?

Why is that I am qualified for so many highly technical jobs as a prime at various federal agencies, but somehow my company is not able to be a viable competitor on less complicated, smaller dollar value, smaller sized jobs with certain local agencies?

The answer doesn't lie with the companies like mine, the answer lies within the agencies that have & continue to prove their unwillingness to work with black and brown people.

Again, This isn't opinion, it is statistical fact. It's not only in New York either, this is a problem nationwide. This nationwide problem is EXACTLY WHY THESE PROGRAMS EXIST.

These programs cannot & will not be successful until the decision makers are held to account as much as we are.

We will never move the needle on these numbers if we are never seen for our experience, our value, or our successes over our race.

The most shameful part of this is the 'haves' fighting to ensure the 'have-nots' continue to have none.

While the companies that are thriving in MWBE programs are fighting against us getting the 2% that we are currently trending at, they continue to gain 98% of what we AREN'T getting access to. If that's not proof of why this amended rule should exist, I don't know what is.

Thank you for the opportunity to most respectfully submit comments,

ICT

Comment added April 14, 2023 2:28pm