



# MOTION PICTURE ASSOCIATION

October 31, 2023

The Honorable Mayor Eric Adams  
1 New York City Hall  
New York, NY 10007

Dear Mayor Adams:

On behalf of the Motion Picture Association, Inc. ("MPA") and its member companies<sup>1</sup>, we support the new rules on changes to the Film Office's permit fees.

We understand the need for the Film Office to adjust its fee structure; however, it is essential to industry stakeholders that the increased revenue will directly support the Film Office's resources to ensure that the office has the staffing and technology necessary to serve the various needs of the growing film, television, and streaming industry in the ever-important New York City production hub.

As filming in New York City resumes, and with the increase in the State's film and television incentive program, we hope that the Film Office can provide an elevated level of service to ensure New York City remains competitive. We hope the City Council provides the Film Office with the necessary support and resources to keep this industry thriving.

Sincerely,

Kathy Banuelos  
Senior Vice President, State Government Affairs, Motion Picture Association

CC: Patricia Kauffman, Commissioner Mayor's Office of Media and Entertainment

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<sup>1</sup> Netflix Studios, LLC, Paramount Pictures Corp., Sony Pictures Entertainment Inc., Universal City Studios LLC, Walt Disney Studios Motion Pictures, and Warner Bros. Entertainment Inc.,



COMMENTS OF **BROADWAYSTAGES** ON PROPOSED CHANGES TO THE RULES FOR PERMITS FOR SCOUTING, RIGGING, AND FILMING ACTIVITIES

October 31, 2023

Thank you for allowing us the opportunity to comment on the Mayor’s Office of Media and Entertainment’s (“MOME”) proposed changes to the rules for permits for scouting, rigging, and filming activities. Broadway Stages strenuously objects to the proposed drastic increase in fees to film production companies in the rules.

Broadway Stages is one of the largest film and television studio production companies in New York. We offer over 60 soundstages, unique locations, production services and support space, in addition to over seven acres of parking, throughout three boroughs in New York City. A full-service studio production company, Broadway Stages provides experience, service and commitment to its clients, community and the environment. With a heritage steeped in tradition and based on unparalleled relationship-driven client service, we have worked with countless production companies to bring some of the most successful feature films, television shows and music videos ever produced to the screen. In New York City we pride ourselves on being the studio production partner-of-choice. Shows using our facilities include Blue Bloods, Law & Order: Organized Crime, FBI and The Gilded Age.

Let us be frank, film production in New York should not be viewed by the City of New York as a bottomless well of revenue for the City’s coffers. The proposed increase in fees to our production company clients from \$300 per season to a bi-weekly \$500, generally amounting to \$10,000 per season per production, is simply outrageous. We respectfully point out that New York is in competition with many other locations, Los Angeles and Toronto in particular, but also the State of Georgia, which provides extensive subsidies to film and television production. Imposing large fees in New York on film production is not cost free to the City. In some cases, it may result in fewer people being employed on sets, and in others, the shoots being shifted to other states, resulting in the loss of thousands of jobs and millions of dollars. Many jobs have already moved to London, which has become a huge hub for production. Current projections indicate that after the settlement of the SAG/AFTRA strike, New York may have half the level of film production related jobs it had in 2019. In order to maintain New York City as a center for film and television production it must become pro-active to attract film makers here. These proposed rules are a step in the wrong direction.

Yes, New York is for many reasons the preferred place to set and shoot a wide range of products from Blue Bloods, Law & Order: Organized Crime, FBI to The Gilded Age. There is no more recognizable location on the planet to set films and TV shows. But the drip, drip, drip of fees, taxes and other costs on film and television production is ultimately unwise and will certainly result in fewer productions, fewer shoots, less money spent, and fewer people employed in good, union, middle class jobs. We respectfully submit that this tremendous, unprecedented increase in costs to our industry will do great harm to both the image and economy of our great city.

# WINICK PRODUCTIONS LLC

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## .Comments regarding proposed amendments to MOME's permit rules

October 31, 2023

My name is Elliot Winick, the President of Winick Productions. I have been a special event producer, primarily in NYC for over 45 years. I have comments regarding both sections that are being proposed to be amended.

### Chapter 8 - Premier Permits

I have helped produce various "red carpet, premier permits" for the following events of the years:

The Grammy Awards, The Tony Awards, Country Music Awards, Latin Grammys, Daytime Emmy Awards, CFDA awards (Council of Fashion Designers of America), and various movie and Broadway show premiers.

In defining the size of an event, sometimes the venue/guest size is an appropriate measure (i.e. Grammy Awards at Madison Square Garden), but often it is not. There have been occasions that I have produced some pretty small red carpet events at MSG (Turner Upfront, Stand up for Heroes, etc). and at other venues. Perhaps there could be a mechanism to have a fee adjustment if this were to be the case. In addition, based on the definitions proposed – if I were to produce a red carpet arrivals (lets say for the Grammy's) at Radio City – the fee would be \$14,000. To do the same identical red carpet arrivals at Madison Square Garden, the proposed fee would be \$24,000. That doesn't make sense – since they are identical. Perhaps it would be more equitable to assess a fee based on square footage of the red carpet area or some blend of square footage and venue size (I would be happy to help try to formulate this).

Section 8-03 (b) – I believe that the section where it discusses what elements are part of the permit, should be removed in its entirety (even though this is not a current proposed amendment)

Most of it is obsolete (I haven't seen a klieg light in over 30 years!). It is also in contradiction to the definition of the size of events. For example, Extra large events mentions street closures as one element of this definition, yet 8-03(b) limits it to one drop off lane. None of the larger red carpet events I have worked on would fit under this requirement and it's basically been ignored over the years. It should be removed and the elements allowed should included in the permit approval process – based on event production, proposed site plans needs and discussions with the various agencies,

### Chapter 9 – Film Office Permits (production, rigging, etc)

I am opposed with the increased cost of a New Project Account application going from \$ 300 to \$500, a 66% increase!

While there might be some justification for an increase for projects that run over several weeks

*Special Events Production, Management and Permits*

(TV series, feature films), I don't believe that is the case for the one-off concerts that I am involved in. In 2022 I processed over **700 film office** permits (mostly for one-day concerts) and paid **\$ 237,000 in fees** to the film office (I may be your biggest customer!)

I process permits for hundreds of concert permits – for Live Nation, AEG, Bowery Presents and most major concert promoters. The venues I permit for include Madison Square Garden, Radio City Music Hall, the Beacon Theater, Terminal 5, Town Hall, Carnegie Hall, Brooklyn Steel, Avant Gardner, Webster Hall, Barclays Center, Yankee Stadium, Citifield, The Shed, Lincoln Center, Park Avenue Armory, Gramercy Theater, Amphitheater in Coney Island, Irving Plaza.

Most of these permits are issued for relatively small venues, like Terminal 5, which may have 20 concerts/permits in a given month. Most of these acts are “marginal” and any increase in fees will hurt.

The Film Office was never created to be a revenue source for the City. It was originally created to be part of the Economic Development of the City – to create jobs in the associated industries. By encouraging and supporting the entertainment industry the City gets income from payroll income taxes generated, sales tax on ticket sales and food/beverage.

I don't see any justification for increasing the fee for these one-day concert permits going from \$300 to \$500 and hope that this does not go through.

I am always available to meet in person to help modify these rules and negotiate the specifics. Let me know if you are interested.

Thank you for your attention.