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New York City Department of Buildings  
Office of the General Counsel  
280 Broadway, 7th floor  
New York, NY 10007

**Re: HMO License Requirements**

To whom it may concern:

I wish to express concerns over the Hoist Machine Operator (HMO) rule revision. The delayed release of this rule significantly shortens the effective period for "alternate grandfather provisions" from two years to approximately 7-8 months, presenting a risk of unemployment for operators due to backlogs in license processing by the Department of Buildings (DOB), which is still addressing applications from 2022.

To address this, we propose extending the deadline for these provisions and the requirement for a limited HMO license from November 7, 2024, to November 7, 2025. Additionally, we recommend allowing operators to qualify for the license based on experience gained in NYC before November 7, 2024, with a preference for full credit toward the two-year experience requirement.

It is critical that the rule clearly states applications must be submitted by November 6, 2024, to qualify under the grandfather provisions. Also, we suggest reducing the training period for certain equipment from two years to one year, considering the advanced safety features of these machines, to ease the financial burden on lift companies.

We hope these recommendations will be considered to facilitate a smoother transition under the new HMO rule while maintaining safety and efficiency. We look forward to the opportunity to discuss these points at the upcoming public hearing on February 28, 2024.

Thank you for considering our suggestions.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Haskell", written over a horizontal line.

Keith Haskell  
Chief Operating Officer  
New Castle Building Products  
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White Plains, NY 10603  
914-358-8107