

# Senid Plumbing & Heating Corp.

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Department of Buildings  
280 Broadway Room/Floor: 7th floor  
New York, New York 10007

Re: The Department of Buildings (DOB) proposal to amend its rules regarding licensing.

Comments Submitted On Behalf Of

**Robert Giuliani, LMP #1220**

I am a NYC licensed master plumber and member of the NYC Master Plumbers Council. I offer the following comments on behalf of myself, my company, and employees.

- **Licensing Fees in section 101-03.**  
Full and limited gas work qualifications. These qualifications are not licenses. Under the proposal, the Full Gas Work Qualification test costs the same as a license. The exams and fees required to obtain this qualification should reflect this. The test questions should be limited to the basic knowledge a person needs to install gas piping safely.  
Limited gas work qualifications are valid for five years from the date of issuance. The compliance date for this law was January 01, 2020. Some limited cards were issued in 2019 before they were required. People who received these cards are being denied the full five years. This issue should also be addressed.
- **Add language from Rule 19-01 into Rule 104-1.**  
The requirement to post a license in a window or have a sign should not be added into Rule 101-4. The NYC Administrative Code (28-401.18.2) requires that I post a photocopy of my license in a conspicuous place near the entrance to my place of business. In addition I am required to have an email address where the Department can contact me. This section also excludes all other licenses required to maintain a NYC location.
- **Proposal to add a new subparagraph to Paragraph (2) of subdivision (c) of section 104-01.**  
If this language is added, the main paragraph should be stricken. The main paragraph requires the applicant to submit all required documents and the proposed additional paragraph states that only commencement of the process is required. Leaving it in potentially creates a conflict.

I respectfully request that the Department review my comments and take them into consideration. They will minimize the compliance costs and are consistent with achieving the intent of the stated purpose of this rule.

