



*The Cable Telecommunications Association of New York, Inc.*

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June 26, 2014

Joanna Weiss  
Associate Counsel  
Joint Commission on Public Ethics  
540 Broadway  
Albany, NY 12207

Dear Ms. Weiss:

Thank you for providing us the opportunity to comment on your proposed Public Service Announcement (PSA) regulations. We appreciate the Commission's diligence in soliciting views from the various stakeholders and crafting a draft rule that is reasonable and balanced.

We respectfully suggest one modification to the proposed rule. As drafted, it would be a violation of Public Officers Law §74(3)(d) to publish a PSA ninety calendar days prior to any election in which a Covered Official is a Candidate.

To promote administrative consistency, we respectfully suggest that the Commission consider amending the time period to mirror that set forth in the Federal Election Campaign Act, 30 days prior to a primary and 60 days prior to a general election (2 USC 434(f)(3)), and this 30/60 day blackout period would more closely align the Commission's proposed rule with NYS's primary and general election candidate certification dates in the NYS Official Political Calendar. This change comports with the Commission's goal of ensuring that PSAs are not electioneering communications while incorporating the federal statutory requirement and more closely harmonizing the rule with New York State's calendar.

Please let me know if you have any questions.

Regards,

A handwritten signature in blue ink that reads "Allison Lee". The signature is written in a cursive, flowing style.

Allison Lee  
President