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VIA FACSIMILE
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June 4, 2008

Deputy Commissioner for Legal Affairs
New York City Department of Sanitation
125 Worth Street, Room 710
New York, NY 10013

Re: Proposed Rules Governing the Distribution of Advertisements on Private Property

Dear Deputy Commissioner for Legal Affairs:

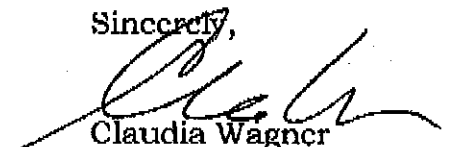
I am writing to express my concerns about the New York City Department of Sanitation proposed rules governing the distribution of advertisements on private property.

Specifically, "advertising," as defined by §16-01 of Chapter 16 of the proposed rules goes beyond the scope of what is contained in Chapter 3 of the New York State Laws of 2008, and infringes upon the right of newspapers to include inserts.

Pre-printed inserts are inherently part of a newspaper. The separation of the parts in an attempt to determine if any one part constitutes an "advertisement" is neither within the language nor intent of Chapter 3 of the New York State Laws of 2008.

Accordingly, we ask that this provision be amended to be consistent with State law, or in some other way that does not infringe upon the rights of newspapers.

Sincerely,



Claudia Wagner