



Jonathan Mintz
Commissioner

[REDACTED]
Deputy General Counsel
[REDACTED]

42 Broadway
8th Floor
New York, NY 10004

[REDACTED]
nyc.gov/consumers

July 6, 2009

Re: Parking Garage License Exemption for [REDACTED]
[REDACTED] Brooklyn, New York

Dear Mr. [REDACTED]:

This letter clarifies whether a parking garage operated by your client, [REDACTED], is exempt from the New York City parking garage licensing law because it is operated in conjunction with [REDACTED] and the [REDACTED] Medical Center for the exclusive accommodation of their patrons and employees. Based upon your client's description of the operation of the garage, the Department has concluded that the garage is exempt from licensing requirements.

The letter of your client's principal, [REDACTED], dated June 3, 2009, describes four categories of persons affiliated with the [REDACTED] and [REDACTED] Medical Center who are permitted to utilize the garage: (1) employees of the [REDACTED] and the Medical Center and physicians who provide treatment there; (2) patients attending outpatient facilities; (3) family and friends of residents of the [REDACTED] and patients at the Medical Center; and (4) representatives of entities doing business with the hospital and nursing home, including, medical equipment technicians, representatives of pharmaceutical companies, medical device technicians, consultants and employees of blood banks and organ donor entities.

Section 20-322 of the New York City Administrative Code provides that parking garage licensing requirements "shall not apply to the maintenance, operation or conduct of a garage . . . b. in conjunction with a business for the exclusive accommodation of patrons of such business or the employees of such business" If your client operates the garage to limit access to the four categories of persons described in Mr. [REDACTED]'s letter, that activity is exempt from Department parking garage licensing requirements. The garage may not offer parking to the general public unless it obtains a license from the Department. This letter rescinds and replaces the Department's interpretation dated April 17, 2008, which stated that drug salespersons are not "patrons of a business" within the meaning of Section 20-322(b) of the Administrative Code.



Please do not hesitate to contact me if you have any questions about this letter.

Very truly yours,

A handwritten signature in black ink, which has been redacted with a solid black rectangular box. The signature appears to be a cursive name, possibly starting with a capital letter that is obscured by the redaction.