



Comments Received by the Department of Consumer Affairs

on

Proposed Rule related to Information Required to be Provided on
Petroleum Product Signs

as made available for public inspection

IMPORTANT: The information in this document is made available solely to inform the public about comments submitted to the agency during a rulemaking proceeding and is not intended to be used for any other purpose

Good morning. My name is Adam Wolf I work at a company named Jericho Wholesale. We supply, lease and operate a chain of gas stations in the New York Metro Market. We'd like to thank Consumer Affairs for working so diligently over the past few years on the proposed rules for the new gas station sign regulations. In conjunction with Local Laws 79 and 80 of 2015, the proposed rules will mitigate consumer confusion while allowing the image of service stations in Metro New York to meet the same standards seen throughout most of the country.

That being said, there are a few problematic items remaining in the new law that I wish to bring to your attention. While the previous laws put into effect were successful in achieving a higher level of consumer transparency, the new proposal would require signs that would both be onerous to produce for the gas station owners and of little use to motorists. The redundant nature of these requirements only serve to confuse consumers. A simpler sign, one conveying all of the same information just in a more compact and communicable manner, would benefit both gas station operators and motorists alike.

To go into further detail, please see the two signs that I have brought with me today and the key differences between the current law being proposed and my suggestions.

For those of you on the Committee that are not aware, when an LED price sign is built, it is built as one price sign for each product. As you can see, the current law would require that we include the brand logo, type of service; full or self, and all taxes included on each of these signs. This redundancy results in a cluttered sign that is confusing to drivers. A simpler sign that conveys the same exact information only in a neater fashion would greatly help all involved parties.

Please see the two renderings of how price signs are installed in all counties and states other than New York City. As you can see, the signs are significantly less cluttered and the core information required to be shown by law are still present.

It is my opinion that we should give more credit to the motoring public of New York City. I do not think they will be misled if the brand of fuel is not listed on each sign. It is clear from the ID sign, the canopy and the pumps all with the brand logo what brand of fuel the customer is buying. This is the same for the "taxes included" and the type of service. If listed once I believe the customer recognizes that it is for all products sold at the location. Simpler signs that maintain the necessary information but present it to motorists in a tighter package will ultimately only help drivers.

I always like to compare our industry to the grocery store business, another industry selling commodities. Does the price posted on the shelf reflect if that item is taxed by the state or city or not? Does each item sold need to have both the price on the shelf and on the item? Does every piece of fruit have a price tag? Does the grocery store have a list of all prices of all items in the window of the store? Gasoline service stations are the most transparent form of retail. The price is posted on the street, on top of the dispenser, on the pump and we provide a running total of your total transaction on the dispenser. At no time are we trying to

bait and switch the consumer. The brand of fuel at the site does not change from the top of the ID Sign to the price sign. The proposed rule changes are simply overkill and only serve to confuse, not inform.

This committee has the opportunity to change the landscape of our industry without deceiving the public. I am asking that we standardize our price sign law so that we can provide a clean clear message to our customers.

Thank you for your time.

5'-1"



5'-1"

(TYP.)
21"



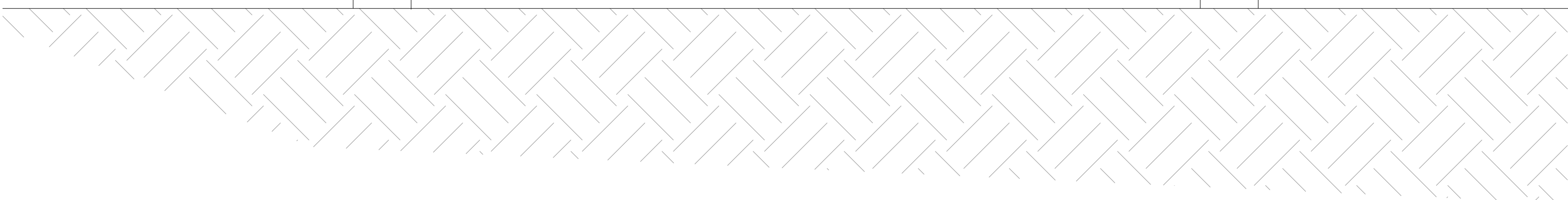
 **Regular
Self Serve
Cash** 
INCLUDES ALL TAXES

 **Regular
Self Serve
Credit** 
INCLUDES ALL TAXES

 **Diesel
Self Serve
Cash** 
INCLUDES ALL TAXES

 **Diesel
Self Serve
Credit** 
INCLUDES ALL TAXES

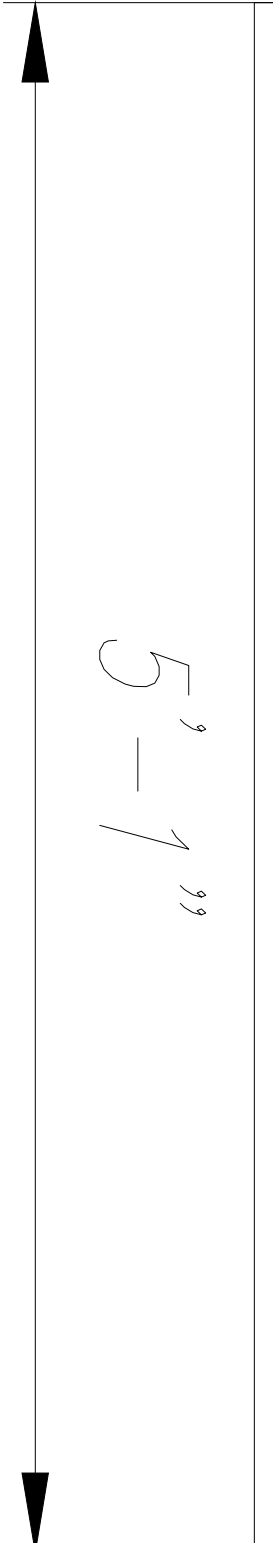
PROP. DIGITAL
DISPLAY PRICE SIGN



5'-1"



5'-1"



SELF SERVICE

Regular
Cash

2.349
10

Regular
Credit

2.449
10

Diesel
Cash

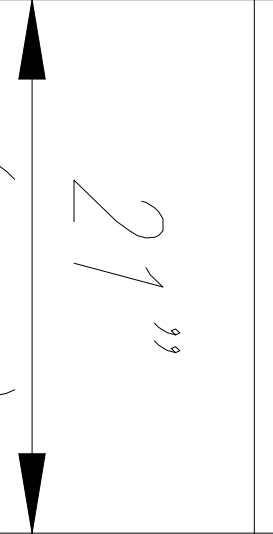
2.349
10

Diesel
Credit

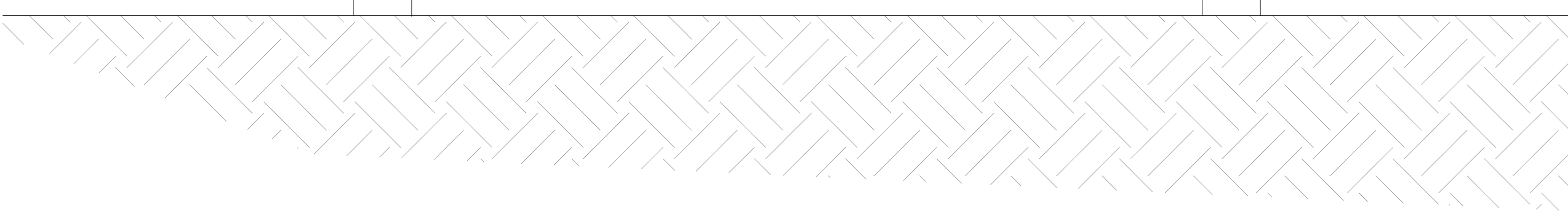
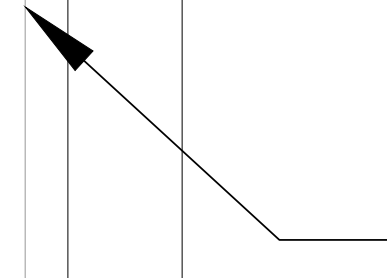
2.449
10

INCLUDES ALL TAXES

21"
(TYP.)



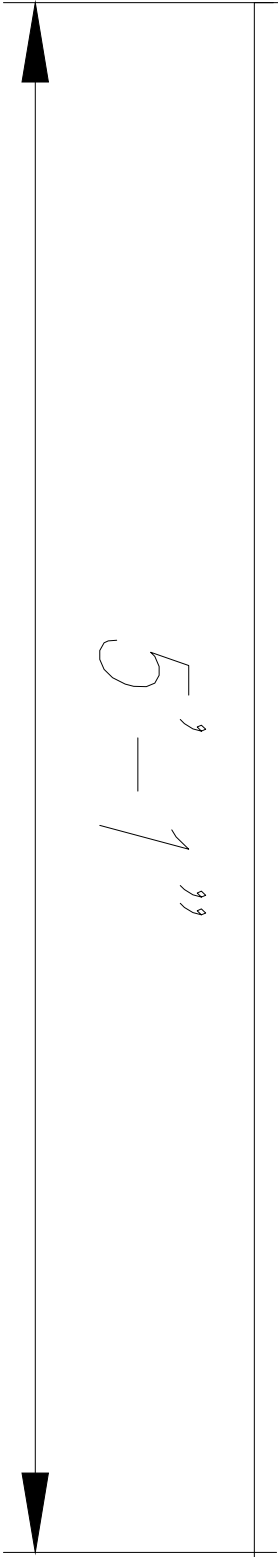
PROP. DIGITAL
DISPLAY PRICE SIGN



5'-1"



5'-1"



SELF SERVICE

Regular

2.349
10

Diesel

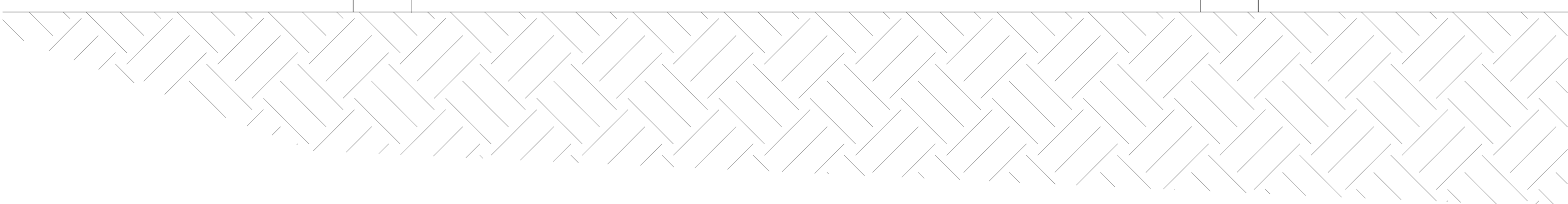
2.449
10

INCLUDES ALL TAXES

(TYP.)
21"



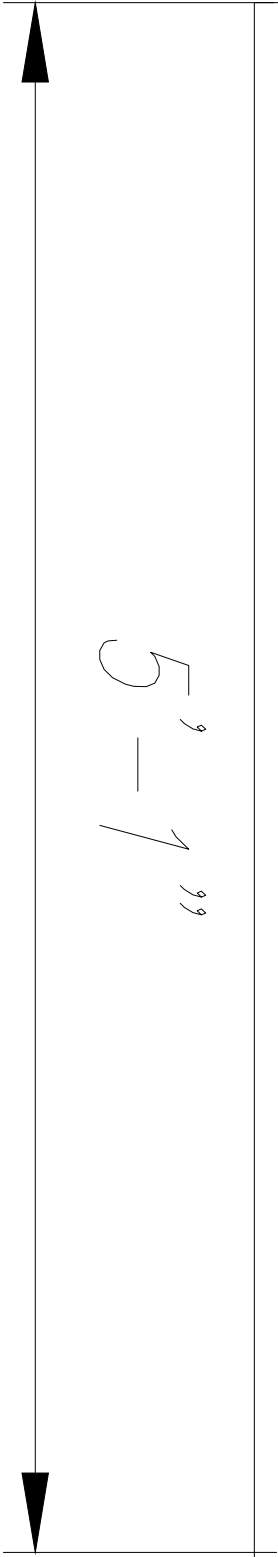
PROP. DIGITAL
DISPLAY PRICE SIGN



5'-1"



5'-1"



21"
(TYP.)

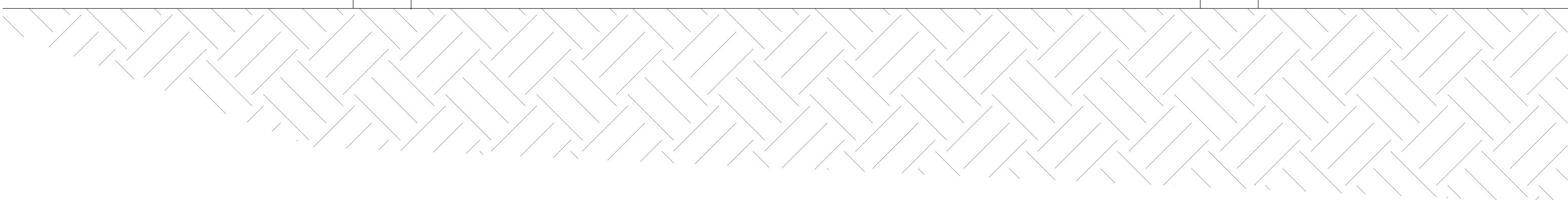


INCLUDES ALL TAXES



INCLUDES ALL TAXES

PROP. DIGITAL
DISPLAY PRICE SIGN





**Self Serve
Cash Price**

Regular

363⁹

**ALL
TAXES
INCL.**

Plus

377⁹

**INCL.
ALL
TAX**

V-Power[®]

389⁹

**ALL
TAXES
INCL.**



SUNOCO

OFFICIAL FUEL OF  **NASCAR**

Bolla Market

Regular

Self Includes All Taxes

2.499

Plus

Self Includes All Taxes

2.719

Ultra 93

Self Includes All Taxes

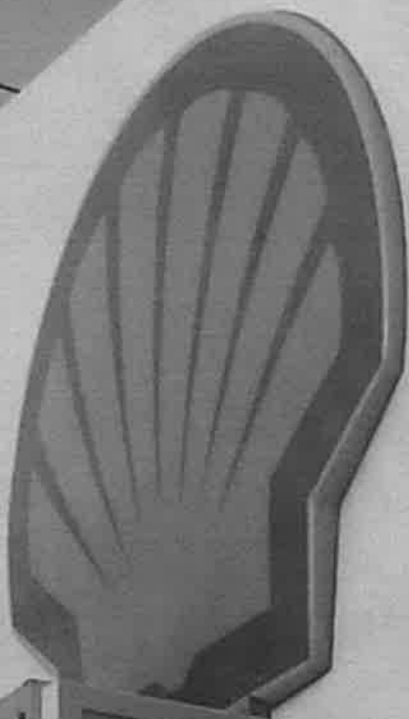
2.919

Diesel

Self Includes All Taxes

2.659

7



Regular UNLEADED 
237 $\frac{9}{10}$ PER GAL INCLUDING TAX
Cash

Plus UNLEADED Full
255 $\frac{9}{10}$ PER GAL INCLUDING TAX
Cash

V-Power UNLEADED Full
269 $\frac{9}{10}$ PER GAL INCLUDING TAX
Cash

269 $\frac{9}{10}$ Cash

SELF
SERVE