

1. Policy Statement

The CNYRTA has an established procedure in place to maintain records of all lobbying contacts made by any persons or organizations with regard to influencing;

- i) the adoption or rejection of any rule or regulation having the force and effect of law
- ii) the outcome of any ratemaking proceeding

2. Reason for Policy

This Policy is in place to ensure adequate record keeping of all lobbying contacts is in place in compliance with Public Authorities Law §2987.

3. Applicability

This Policy applies to all members of the CNYRTA Board of Members, the Chief Executive Officer (CEO), Deputy Chief Executive Officer and all employees of the CNYRTA.

4. Resources & Related Procedures

Public Authorities Law §2987
CNYRTA Lobbying Contact Form

5. Definitions

Authority/CNYRTA – Central New York Regional Transportation Authority and its subsidiaries; (CNY Centro, Centro Call-A-Bus, Centro of Oswego, Centro of Oneida, Centro of Cayuga, Centro Parking, Intermodal Transportation Center).

Client – A person or organization who retains, employs or designates a person or organization to carry on lobbying activities on their behalf.

Lobbying – Any attempts to influence; (1) the adoption or rejection of any rule or regulation having the force and effect of law by the CNYRTA, (2) the outcome of any ratemaking proceeding conducted by the CNYRTA.

*Note: This does not include persons who participate as witnesses, attorneys or other representative in public proceedings of CNYRTA if their participation is part of the public record of that proceeding.

Lobbying Contact – Any conversation, in person or by telephonic or other remote means, or correspondence between any lobbyists engaged in the act of lobbying and any officer or employee within the CNYRTA who can make or influence a decision on the subject of the lobbying on behalf of the CNYRTA. For the purposes of this policy all officers and executive management staff are considered capable of influencing a decision on behalf of the CNYRTA regardless of the subject of the lobbying.

Lobbyist - A person or organization retained, employed or designated by any client to engage in lobbying. Term lobbyist does not include an officer, director, trustee, employee, counsel or agent of the

Lobbying Records Policy

Company Approved Policy

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Approved By:
Chris Tuff, Deputy CEO

Owner: Administration

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State of New York, or any municipality or subdivision of the State of New York when discharging their official duties.

6. Policy Detail

I. Recording Lobbying Contacts

- a. Every CNYRTA employee who receives a Lobbying contact must document the contact. The documentation must include;
 - i. Day & Time of each contact
 - ii. Identity of the lobbyist
 - iii. General summary of the substance of the contact
- b. If the contact was made via email, the email record itself must be retained and will be considered sufficient documentation of the contact.
- c. If the contact was made via phone or in person, the employee must document the information in section (a) in writing.
- d. Employees must submit all records of lobbying contacts to the Deputy Chief Executive Officer - who is the designated officer under PAL §2987

II. Lobbying Contact Record Maintenance

- a. The designated officer ensures that all lobbying records are stored for a minimum of seven years in a filing system designed to make such records useful in determining whether CNYRTA decisions concerning rule or ratemaking proceedings were influenced by lobbying contacts.

***Note:** This policy is separate and distinct from lobbying influence in Authority procurements. Attempts to influence procurements must be recorded and documented in the procurement file and, if necessary, referred for investigation as detailed in the Procurement Lobbying Policy.