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New York State
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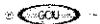
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Mr. Robert J. Fleury
First Deputy Commissioner
NYS Office of General Services
Empire State Plaza
Albany, New York

Dear Mr. Fleury:

On behalf of the 53,000 members of the New York State Public Employees Federation, AFL-CIO, I am writing regarding the implementation of S 027-B / A 4421 – B. PEF wishes to encourage OGS to expediently promulgate regulations necessary to implement the changes in the public building law that require equipping each public institution and building of the State of New York with an automated external defibrillator (AED) by April 1, 2005.

In addition to the rapid development of the rules, PEF is also recommending that the regulations include the following:

1. Include all State of New York occupied leased facilities.
2. Conduct periodic drills for AED responders; and
3. Refer to requirements currently in Article 30 Section 3000-b of the public health law such as;
 - a. appropriate training courses in the use AEDs;
 - b. routine maintenance and testing of AEDs;
 - c. appropriate supervision of AED programs by licensed professionals;
 - d. ensure coordination with local emergency medical services regarding AED placement; and
 - e. maintain records of incidents of use of the devices.

Quick access to defibrillation, 5 minutes or less, has been proven to significantly reduce the death rate from cardiac arrest. The NYS Public Employees Federation has heard from many PEF leaders that agencies are waiting for promulgation of the new regulations before establishing AED programs at many sites. Therefore, time is of the essence. We urge you to make establishment of these regulations a priority for OGS.

Thank you in advance for the opportunity to provide input on this important rulemaking.

Sincerely,

Roger E. Benson
President

cc: George Madison, Director, GOER
PEF Executive Board
PEF Council Leaders
PEF Executive Staff
PEF Health & Safety Staff