

**Comments of LANDMARK WEST!
Certificate of Appropriateness Committee
To the Transportation Committee, Community Board 7
Regarding the Proposed DoITT Rule Relating to Regulation of Public Pay Telephones
Tuesday, February 10, 2004**

LANDMARK WEST! is a not for profit community organization committed to the preservation of the architectural heritage of the Upper West Side.

The Certificate of Appropriateness Committee wishes to comment on the proposed rule relating to regulation of public pay telephones. The Committee supports the adoption of the proposed amendments to Chapter 6 of Title 67 of the Official Compilation of Rules of the City of New York, which would prohibit advertising on public payphones in Community Districts 1 through 8.

The proliferation of public pay telephones bearing advertising is a detriment to our city streets:

- Public payphones can no longer be placed in the same category of “background” utilitarian street furniture as mailboxes and fire hydrants – invisible, except when you need them. They are now very much “foreground” objects, their designs informed not by the function they serve, but by the amount of advertising they can accommodate. Advertising is now, in fact, their primary reason for being.
- Advertising dictates the overall dimensions of payphones. The current citywide telephone franchise agreement facilitates the approval of overscaled phones that incorporate nearly 130 square feet of illuminated advertising—essentially billboards with telephones attached. Illuminated signs require thick panels and wiring, which in turn require a stocky supporting structure. The resulting bulky payphones are a hindrance to pedestrian traffic flow, block sightlines, and thereby impede views of historic streetscapes, building facades, and business signage.
- Their location and their sheer numbers do not correspond to any rational public need. For example, in the three-and-a-half-block portion of Broadway included in the Upper West Side/Central Park West Historic District, there are *12 payphones*. And there are *11 payphones* within one block of 72nd Street along Columbus Avenue.
- The extent of different, frequently incongruous designs that are put forward by the various telephone companies often results in cacophony at the corner, as each company vies to establish its own unique presence. For example, among the 12 payphones in the historic district along Broadway, four different styles are represented. There are three different styles at the intersection of 72nd Street and Columbus Avenue.
- In historic districts, the integrity of a whole environment, not just one landmark building, is at stake. A proliferation of phones, individually and collectively, creates unnecessary clutter that ultimately erodes the visual character of historic neighborhoods and detracts from a historic district’s sense of place, thereby undermining the City’s own legislation designed to protect historic resources in context.