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NY Public Research Interest Group • OpenPlans • Women's City Club

Rahul N. Merchant  
Commissioner  
Department of Information, Technology and Telecommunications  
75 Park Place, 9th Floor  
New York, NY 10007

May 11, 2012

Dear Commissioner Merchant,

Congratulations on your appointment as New York City's first Citywide Chief Information and Innovation Officer, and as Commissioner of the Department of Information, Technology and Telecommunications. Our groups are strong supporters of the city's efforts to use Information Technology to become more transparent and efficient.

We write today to offer our strong support for DOITT's efforts to implement Local Law 11, New York's path breaking Open Data Law. We commend the work that DOITT's staff has done developing the document, and DOITT's open-minded and innovative approach to the Open Data Law. We believe the City's Open Data Law, and its successful implementation, are important nationally and will be watched closely by state and local governments.

We applaud DOITT's early efforts to engage the interested public, and experiment with collaboration tools like the online, fully editable, wiki version of the Standards document. The wiki is an innovative idea and is well worth trying. Our groups have made specific edits to that document. But as key civic stakeholders, we also wanted to provide you with the following comments and recommendations. These reflect a consensus among our groups regarding DOITT's *Open Data Technical Standards and Policies* document.

We look forward to working with you to make the Open Data Law a big success.

Sincerely,

Gene Russianoff  
NY Public Interest Research Group

John Kaehny  
Reinvent Albany

Phil Ashlock  
Civic Commons

Rachael Fauss  
Citizens Union

Susan Lerner  
Common Cause

Frank Hebbert  
OpenPlans

Adrienne Kivelson  
League of Women Voters NYC

Marjorie Shea  
Women's City Club

CC via email: Nick Sbordone, DOITT, Andrew Nicklin, DOITT

May 11, 2012

## **NYC Transparency Working Group Comments on DOITT Open Data Standards Manual**

### **1. There Should Be a Clear Policy Statement on Open Data.**

The Standards manual should include a clear goal statement about implementing the Open Data Law. We recommend the Standards document say:

“The goal of the City of New York’s Open Data Law is to make the city’s public data as easy to find and use as is possible, consistent with the New York State Freedom of Information Law.”

### **2. Our Groups Strongly Support Designating an Open Data Coordinator at Each Agency.**

We strongly support the designation of an Open Data Coordinator at each City agency. The Standards Manual should clarify that the coordinators should be available to respond public inquiries about open data. Their names, phone numbers, and email addresses should be listed on agency websites and the open data portal.

### **3. Create An Open Data Dashboard.**

Our groups strongly recommend that DOITT should create via the Standards Manual a public Open Data Dashboard to promote public and internal accountability. The site should track which data has been made available via the Open Data Law, and make it clear how well agencies are complying with Local Law 11. A good model is the White House Open Government Dashboard (See <http://www.whitehouse.gov/open/around>).

### **4. DOITT Should Use NYC Domain Names for the Open Data Portal(s)**

DOITT should use the NYC domain name for all open data portals (and more generally online applications.) The city should establish a unique and permanent NYC domain for its open data website. (For example: <https://opendata.nyc.gov>.) The City should avoid being locked into the domain of a particular vendor, especially since an open data portal is a generic platform, not a social media channel.

### **5. The City Should Clarify and Revise its Information Classification**

We strongly recommend that the City review its Information Classification standards and rewrite them to be more specific, and clearly consistent with the privacy, intellectual property, and security exceptions in the NYS Freedom of Information Law. The Classifications should make it clear to the public, City Council and agency data coordinators what data can and cannot be posted online. Further, by clearly articulating what exceptions exist in the Manual, the rationale for not releasing certain data sets will be more apparent to everyone at the outset. In this way, the City can foster an environment of trust between its agencies and the public.