

ROOSEVELT ISLAND OPERATING CORPORATION

Guidelines Regarding Lobbying Contacts

As required by Section 2987(4) of the Public Authorities Law of the State of New York, the Board of Directors of the Roosevelt Island Operating Corporation (the "Corporation") hereby adopts the following guidelines, which shall govern, along with, Title 12-A of the Public Authorities Law, and other applicable law, procedures to be followed when persons within the Corporation are contacted by lobbyists.

1. Definitions

As used herein:

"Lobbyist" shall mean (1) every person or organization retained, employed or designated by any client to engage in lobbying. The term "lobbyist" shall not include any officer, director, trustee, employee, counsel or agent of the State, or any municipality or subdivision thereof of New York when discharging their official duties; except those officers, directors, trustees, employees, counsels, or agents of colleges, as defined by section two of the Education Law; or (2) as otherwise then defined in section one-c of the Legislative Law.

"Lobbying" shall mean and include any attempt to influence:

- (i) the adoption or rejection of any rule or regulation having the force and effect of law by a public authority, and
- (ii) the outcome of any rate making proceeding by a public authority.

"Contact" shall mean any conversation, in person or by telephonic or other remote means, or correspondence between any lobbyist engaged in the act of lobbying and any person within the Corporation who can make or influence a decision on the subject of the lobbying on behalf of the Corporation, and shall include, at a minimum, all members of the governing board and all officers of the Corporation.

2. Record Keeping

The Corporation shall maintain a record of all lobbying contacts made with the Corporation. Every member, officer or employee of the Corporation who is contacted by a lobbyist shall make a contemporaneous record of such contact containing the day and time of the contact, the identity of the lobbyist and a general summary of the substance of the contact. Copies of all such records shall be delivered to the Chief Financial Officer of the Corporation, who shall maintain such records for not less than seven years in a filing system designed to organize such records in a manner so as to make such records useful to determine whether the decisions of the Corporation were influenced by lobbying contacts.

Dated: March 25, 2010