January 15, 2014

The Honorable John D. Rockefeller IV Chairman, U.S. Senate Committee on Commerce, Science and Transportation Washington, D.C. 20510-6125

#### Dear Chairman Rockefeller:

The Port Authority is in receipt of your letter of December 16, 2013 pertaining to the toll lane closures on the George Washington Bridge ("GWB") from September 9-13, 2013. I am transmitting the following responses to your letter on behalf of the Port Authority in my capacity as Board Secretary.

Given that this issue is under investigation and the Board still does not have many of the facts as to the motivations behind actions taken at the GWB, the information being provided to you outlines the normal process of the Port Authority with respect to toll lane closures and the operational decisions made at that point in time, in response to the directions from the former Port Authority Director of Interstate Capital Projects. The information set forth below has been extracted from the testimony of Mr. Cedrick Fulton. the Director of Tunnels, Bridges and Terminals Department of the Port Authority ("TB&T"), Mr. Robert Durando, General Manager in TB&T for the GWB, and Patrick J. Foye, Executive Director of the Port Authority, before the New Jersey State Assembly Committee on Transportation, Public Works and Independent Authorities ("Assembly Committee"), during their Hearings to Address Unannounced Lane Closures at the GWB on December 9, 2014. For your convenience, the transcripts may be accessed on the Assembly Committee's web site via the following link http://www.njleg.state.nj.us/legislativepub/pubhear/atr12092013.pdf. Specific page references to such testimony are noted in the responses to questions.

The Port Authority will cooperate with all investigations into this matter and will take all appropriate actions to ensure that what occurred at the GWB never occurs at any of the Port Authority's facilities again.

# THE PORTAUTHORITY OF NY & NJ

The Honorable John D. Rockefeller IV January 15, 2014 Page 2

The Port Authority shares your concern regarding the aberrational events that occurred at the George Washington Bridge last September, which are not in any way representative of the manner in which business is conducted at the Port Authority.

The Port Authority strongly supports your efforts, and those of your Committee, to ensure that the region receives the level of transportation services which its residents and the regional economy deserve. The Board of Commissioners will continue to work towards fulfilling the mission entrusted to us as a key interstate transportation agency in one of the nation's largest transportation corridors.

Respectfully,

The Port Authority of New York and New Jersey

Karen E. Eastman

**Board Secretary** 

# RESPONSES TO QUESTIONS SET FORTH IN DECEMBER 16, 2013 LETTER FROM THE CHAIRMAN, U.S. SENATE COMMITTEE ON COMMERCE, SCIENCE AND TRANSPORTATION

# Question 1

What is the standard process for lane closures and/or a traffic study at The Port Authority of New York and New Jersey? Please include details on the internal approval process, the agencies that must be notified, public notification requirements, and the types of actions that are taken to minimize traffic disruptions. How long does this planning process typically take? How far in advance is the public typically notified?

#### Response:

The process typically involved in adjusting or closing toll lanes at the Port Authority's interstate vehicular tunnel and bridge crossings varies depending upon the nature of adjustment or closure, which includes, but is not limited to, the objective for the adjustment or closure, the nature of the actions required, the time of day and day of week, and the location and duration of the adjustment or closure. This process typically begins with TB&T.

Lane adjustments or closures at the interstate crossings may be the result of planned or unplanned circumstances. Most often, planned lane adjustments or closures stem from or relate to activities such as scheduled maintenance routines and construction to advance capital improvement projects, but may also include special events such as sporting events and public service events (e.g., walk-a-thons).

The approval process for major planned lane adjustments or closures is closely tied to the procurement and contract award process for major capital projects. Generally, these plans involve a "maintenance of traffic" plan, which specifies the lane adjustments or closures and hours of work that are permissible under the construction contract. These specifications are defined in procurement documents and the resulting construction contracts, based upon analyses by Port Authority transportation planners and traffic engineers, which evaluate trade-offs between estimated traffic delays/queuing and construction productivity and the associated project costs. Most larger capital improvement projects are approved by the Board of Commissioners with the details of the contract, including mitigation plans for any anticipated traffic impacts, available at

the time of project approval. Prior to consideration for Board approval, project authorizations undergo an extensive and multidisciplinary review process with the participation of Port Authority engineering, financial, legal, procurement and technical staff, including reviews by the Executive Director and Deputy Executive Director.

Planned construction activity is scheduled to the greatest extent possible to occur in offpeak travel hours when travel demand tends to be lowest, often occurring during the overnight hours. Planned maintenance activity also tends to be scheduled during offpeak hours to minimize traffic impacts, but depending upon the nature of the work may sometimes be scheduled during the midday hours between the morning and evening peak commuting hours.

Traffic studies are sometimes conducted in connection with planned lane adjustments or closures and ordinarily are conducted through transportation models and analytical methods to determine costs and benefits. Any traffic study that would require lane closures would require advanced communications to other transportation operators, local municipalities, and the traveling public.

Unplanned lane adjustments or closures may be required for various unanticipated and emergency circumstances, including but not limited to, traffic incidents, corrective maintenance actions, and emergency construction to address failures in infrastructure and systems that present impediments to mobility and concerns for safety.

In the case of routine closures, the type of work and required lane closures have occurred over a long number of years and today the routine nature of planned maintenance activities (e.g., tunnel washing) allows for a review and approval process at levels appropriate for these undertakings. Routine operating procedures are typically communicated at the facility level between operations, maintenance, construction and public safety staff, and reviewed by the Facility manager. Quarterly Performance meetings with the COO provide for the opportunity to review routine operations, such as discussion about incident response times, and the impact of accidents on traffic flow.

#### Question 2

As a bi-state agency, what is the standard process for coordinating operational decisions, like lane closures, between the two states? How is each state made aware of these decisions and how long does take to ensure that all parties are coordinated?

#### Response:

It is standard practice for decisions that involve the alteration of operations at the Port Authority's four interstate bridges and two tunnels to be initiated and managed by Traffic Engineering and TB&T professionals. From a communication point of view, typically the Executive Director and the Deputy Executive Director would confer on these issues.

External communication is coordinated within the Port Authority through the agency's Media Relations and Government and Community Affairs staff. Such staff manage the Port Authority's web site, subscription-based e-alert customer notification services, weekly media advisories, press releases, and notifications to community groups, municipal offices and elected officials, depending upon the extent of the expected traffic impacts.

Major construction and planned maintenance activities are also coordinated and communicated through TRANSCOM, a coalition of regional highway and transit operators and public safety organizations in New York, New Jersey, and southern Connecticut. TRANSCOM has developed and maintained a regional transportation management information system (OpenReach) used by all member organizations to share information of real-time highway and transit conditions, scheduled construction and maintenance activity, incident management and response, and special events. TRANSCOM's OpenReach system shares information among regional transportation operators, and serves as the information engine for many traveler information systems, including the 511 systems in New York and New Jersey.

In the case of emergency closures, the information is generally communicated agency-wide from the Port Authority's Central Police Desk, and from each facility's traffic management center to travelers subscribed to the Port Authority's e-alerts system. Emergency closure information is also communicated to Media Relations and Government and Community Affairs staff and to TRANSCOM, as well as directly to travelers.

The Port Authority produces weekly traffic advisories that are available to a wide range of media outlets and TRANSCOM, as well as available on the Port Authority's web site. Generally, notification more than a week in advance of any planned closure has proven to be less effective than communicating plans during the week immediately prior to scheduled lane closures.

Lane closures, whether they are planned (e.g., scheduled construction) or unplanned (e.g., emergency maintenance or incident management), are generally communicated through TRANSCOM, the Port Authority web site, Port Authority e-alerts, and the 511 traveler information systems in NY and NJ. Lane closures that are expected to have significant impacts on traffic in the adjacent jurisdictions are typically communicated directly through each state's traffic management center, as well as to the local municipal public safety organizations in the local municipalities. Unplanned lane closures are typically communicated in real-time through TRANSCOM, along with periodic updates until the restoration of full-service conditions. Planned lane closures are typically communicated to the two states through construction coordination meetings hosted by TRANSCOM and directly with the State Departments of Transportation and local municipalities if the closure is expected to have significant traffic diversions or delays.

Planned operational changes are coordinated through inter-agency meetings at least a week in advance of the change, with more advanced discussions scheduled as needed for actions requiring a greater need for interagency support and mutual interaction. TRANSCOM also convenes its member agencies quarterly to review construction and significant operational changes, with more frequent weekly and/or daily meetings, as required, to coordinate special operations and major construction projects.

The Executive Director and Deputy Executive Director typically meet prior to operational changes at the Port Authority's facilities. This process did not take place prior to the toll lane closures last September at the George Washington Bridge.

# Question 3

What process was followed for the lane closures from September 9th through 13th? How was this closure communicated between the two states?

# Response:

The operations decisions within the Port Authority for the toll lane closures at the GWB from September 9<sup>th</sup> through September 13<sup>th</sup> were based on the direction of the former Director of Interstate Capital Projects, David Wildstein.

The GWB toll lane closures from September 9-13, 2013 involved the closure of two of the three approach lanes on the 300-foot ramp connecting Bruce Reynolds Boulevard in

Fort Lee with the GWB Upper Level toll plaza. All other roadway approach lanes and toll lanes remained open.

Approximately 12 days prior to the closure of the Fort Lee approach lanes to the GWB Upper Level toll plaza, the Port Authority's former Director of Interstate Capital Programs, Mr. David Wildstein, informed the Chief Engineer about his intent to make changes to the GWB Upper Level toll plaza. The Chief Engineer raised traffic safety concerns related to the local traffic merge situation that would be created, including the risk of sideswipe crashes. The Chief Engineer advised Mr. Wildstein that the Chief Traffic Engineer would review the local traffic situation that would be created by the planned change. The review was done and sketches were provided to TB&T for the change that identified coning scenarios of going from three to two lanes and three to one lane. This information was shared with the TB&T staff on the morning of September 6, 2013. Mr. Wildstein communicated the decision to make such a change to the Port Authority's Engineering Department, to the Director of TB&T (Cedrick Fulton), and to the GWB General Manager (Robert Durando) on Friday, September 6, 2013, with a scheduled implementation on Monday, September 9, 2013 at 6 a.m. (Tr. 16, 18, 82). Mr. Wildstein directed Mr. Durando to reduce the Upper Level toll plaza toll lanes dedicated to the Fort Lee local approaches from three toll lanes to one toll lane, effective the morning of September 9, 2013 (Tr. 28, 85, 86, 91, 114). Mr. Wildstein directed the lane closures on a daily basis during this period.

Mr Durando informed the Port Authority Police Captain at the facility of the operational change as well as TB&T operations and maintenance staff who would be responsible for implementing the changes (Tr. 97, 99, 101)

On September 6, 2013, Mr. Fulton and Mr. Durando communicated Mr. Wildstein's directive to close the GWB Upper Level toll lanes to the Port Authority's NJ Director, Government and Community Affairs (Tina Lado). Both Mr. Durando and Mr. Fulton spoke with Ms. Lado regarding the closures over the period of September 6-13, 2013. Following the first day of the test on September 9, 2013, Ms. Lado advised Mr. Durando and Mr. Fulton that she was receiving phone calls from the Fort Lee Mayor's Office regarding the lane closures, and that she was forwarding the information to the Deputy Executive Director's Office.

Starting on Friday, September 6, 2013, Mr. Fulton sought assurances from Mr. Wildstein that the Port Authority's Executive Director was properly briefed (Tr. 18, 19, 28). Assurances were given by Mr. Wildstein to Mr. Fulton that such communication was

being handled (Tr. 19). Mr. Wildstein also informed Mr. Fulton that he would advise the Port Authority's Media Relations and Government and Community Affairs staff of the plan (<u>Id</u>.). Separately, Mr. Wildstein directed Mr. Durando not to communicate information about the lane reduction to officials in Fort Lee. Mr. Wildstein made it clear that he would control the communication about the toll lane closures (Tr. 98, 108). Mr. Wildstein failed to inform or brief the Executive Director.

# Question 4

At recent New Jersey State Assembly hearings, the Port Authority gave conflicting testimony about the purpose of the lane closures. What prompted the closure of the access lanes from September 9 through September 13? Was a traffic study ever planned for this or was this reason fabricated?

#### Response:

The changes to the GWB's Upper Level toll plaza configuration were directed by Mr. Wildstein. The rationale provided to Port Authority staff by Mr. Wildstein for the change was to seek a new balance of traffic flows from the numerous approaches to the GWB Upper Level, by providing more peak-period toll lane capacity to the traffic flows from the "main line" - I-80/I-95, U.S. Route 46, and NJ Route 4 (Tr. 28, 31, 59, 102, 105, 112). No formal approval process to conduct a traffic study (as more fully discussed in the response to Question 1) was sought prior to the toll lane closures made on September 9, 2013.

#### Question 5

Who approved former Deputy Director Baroni's testimony for the State Assembly hearing? Did the Board review or approve the testimony? What investigation was conducted by the Board prior to his testimony? At what point was the Board made aware that most of the Authority had no knowledge of a traffic study?

# Response:

It does not appear that Mr. Baroni sought approval within the Port Authority for his testimony. The Board did not review or approve Mr. Baroni's testimony prior to his appearance before the Assembly Committee. The Chairman and Vice Chairman of the

Board were copied on the Executive Director's September 13, 2013 e-mail reversing the toll lane closures.

#### Question 6

It is my understanding that TRANSCOM was created to coordinate construction activities between the New York-New Jersey region and that the Port Authority is a member agency. Their systems help public safety officials and emergency responders to make real-time, informed safety decisions, such as rerouting emergency vehicles around incidents and minimizing traffic delays. Did the Port Authority coordinate the lane closures with the public safety and emergency responders? If not, what steps were taken to ensure that safety would not be impeded?

# Response:

TRANSCOM was not notified in advance of the new toll lane closures at the GWB Upper Level toll plaza (Tr. 127). Mr. Wildstein indicated at the time he issued his directive to change the toll plaza configuration that he would control the communication about the toll lane closures (Tr. 98, 108).

Prior to the toll lane closures on September 9, Mr. Durando communicated Mr. Wildstein's directive to the GWB Port Authority Police Department Commanding Officer, Captain Darcey Licorish (Tr. 97). Captain Licorish ensured that Port Authority traffic control posts in Fort Lee would be staffed for heavy traffic volume conditions. These posts were also staffed for a longer period through the morning to ensure that traffic dissipated prior to removing the coverage (Tr. 133).

After being informed of the planned change, the Chief Engineer raised traffic safety concerns related to the local traffic merge situation that would be created, including the risk of sideswipe crashes. The Chief Engineer advised that the Chief Traffic Engineer would review the local traffic situation that would be created by the planned change. The review was done and sketches were provided to TB&T for the change that identified coning scenarios of going from three to two lanes and three to one lane.

#### Ouestion 7

Prior to the closure, who at the Port Authority knew about the decision? What concerns were raised?

# Response:

The GWB Upper Level toll plaza lane closure was directed by Mr. Wildstein on September 6, 2013 for implementation on Monday, September 9, 2013 at 6 a.m. As discussed above, Mr. Wildstein informed the Chief Engineer about the intent of making changes to the GWB Upper Level toll plaza and the Chief Engineer raised a concern related to the local traffic merge situation that would be created, including the risk of sideswipe crashes. The Chief Engineer advised that the Chief Traffic Engineer would review the local traffic situation that would be created by the planned change. The review was done and sketches were provided to TB&T for the change that identified coning scenarios of going from three to two lanes and three to one lane. Mr. Wildstein also communicated this change directive to Mr. Fulton and to Mr. Durando. Mr. Durando communicated the directive to GWB Deputy General Manager Enrique Ramirez, GWB Physical Plant Manager Ken Sagrestano, and GWB Police Commander, Port Authority Police Captain Darcey Licorish. As noted, facility operations, maintenance and police staff were informed, in order to execute the implementation of the directive on the morning September 9, 2013. Mr. Fulton informed TB&T Deputy Director, Diannae Ehler and TB&T Assistant Director, Mark Muriello, who in turn readied TB&T transportation planning staff to collect toll plaza traffic throughput data and prepare for a before-and-after monitoring of GWB morning eastbound traffic to assess congestion and delays. Mr. Fulton also advised Ms. Lado to ensure her awareness in light of potential community reaction. According to Mr. Baroni's testimony before the New Jersey Assembly Committee on November 25th, 2013, Mr. Baroni stated that he was made aware of the decision for the GWB toll lane closures prior to its implementation.

Traffic engineering staff raised concerns about the risk of sideswipe incidents without a continued use of a cone line separating Fort Lee traffic from the NJ highway access lanes, which resulted in the decision to maintain the cone line. Transportation planning staff also raised concerns about added congestion and delays on the local approach roads. Facility management raised the concern of not advising Fort Lee as a negative impact to a longstanding productive working relationship that had been established between facility operations staff and the borough (Tr. 18, 28, 34).

#### Question 8

At the State Assembly hearing, it was insinuated that some employees may have feared retribution, if they raised concerns about the closing. Are there processes in place for

employees to anonymously raise concerns? If so, were these processes used and why did they not work in this instance? What steps are you taking to address the concerns of retribution and ensure that employees can raise valid concerns?

#### Response:

Immediately following the testimony by Mr. Fulton and Mr. Durando at the State Assembly hearing, the Port Authority's "Whistleblower Policy" (Administrative Instruction 20-1.18), was reviewed at the request of the Chairman and the Vice Chairman of the Port Authority, and it was confirmed that it provides clear and appropriate protections for the reporting of "misconduct," and is well advertised and administered by the Port Authority's Office of the Inspector General. The Board's Governance and Ethics Committee, which also periodically reviews the continuing effectiveness of these types of compliance policies, will continue to focus on the Whistleblower Policy. The Whistleblower Policy is attached for your convenience. Also attached is the promotional poster that appears on the Port Authority's intranet site, and is posted generally at Port Authority facilities as an alert to employees. The Port Authority's web site has a separate page for the Office of the Inspector General (http://www.panynj.gov/inspector-general/) and another for the reporting of complaints to the Office of the Inspector General (http://www.panynj.gov/inspector-general/fraud-complaint-form.cfm). The Office of the Inspector General's employee education programs also cover the Whistleblower Policy. There are a variety of methods for an employee to report "misconduct," including through a dedicated hotline, and on a confidential basis.

In this instance, the whistleblower procedures were not triggered by Mr. Fulton or Durando (Tr. 101). Mr. Fulton and Mr. Durando understood that Mr. Wildstein served in an executive leadership role at the Port Authority that was recognized by staff as the second-in-command from NJ, after the Deputy Executive Director, Bill Baroni. The GWB toll lane closures was initiated with assurances that the Executive Director would be informed and external communications would be handled (Tr. 28, 89). Mr. Fulton and Mr. Durando understood the unusual nature of the operation they were asked to undertake and expressed their concerns about its impact on traffic and congestion. However, they viewed the closures as operationally challenging but manageable (Tr. 90: "I had every confidence that the Port Authority Police, my operations and maintenance staff were fully capable of operating under these extreme circumstances" (Mr. Durando)). Based on information available to them at the time, neither Mr. Durando nor Mr. Fulton believed that Mr. Wildstein's directive was a matter for review with the OIG.

# THE PORTAUTHORITY OF NY & NJ

The Honorable John D. Rockefeller IV January 15, 2014 Page 12

# Question 9

Did anyone conduct research into the potential impacts of closing access lanes to the busiest bridge in the nation? What were the ultimate impacts of these lane closures on congestion, commerce, and safety?

# Response:

It was clear to operations, planning and engineering staff that the toll lane closures would cause additional congestion in Fort Lee. Following the changes to the GWB Upper Level toll plaza toll lane configuration, the congestion in Fort Lee was significant.

Subsequent to Port Authority testimony at the NJ State Assembly hearings on this matter, the Port Authority's Chief Economist was asked to perform an economic impact analysis of the toll lane configuration change, largely based upon the cost of additional travel delays experienced from the local roadways (Tr. 206). A copy of that analysis will be provided to the Committee when it is completed.



AI 20-1.18

# Office of the Executive Director

September 7, 2007

#### WHISTLEBLOWER PROTECTION

#### Definitions

For purposes of this Administrative Instruction, the following terms shall have the indicated meaning:

- A. "Adverse personnel action" shall include any material alteration to existing terms, conditions and privileges of employment including, without limitation, dismissal, demotion, suspension, compulsory leave, disciplinary action, negative performance evaluation, any action resulting in loss of staff, office space or equipment or other benefit, failure to appoint, failure to promote, or any transfer or assignment or failure to transfer or assign against the wishes of the affected employee.
- B. "Remedial action" means an appropriate action to restore the employee to his or her former status, which may include one or more of the following:
  - reinstatement or redeployment of the employee to a position the same as or comparable to the position the employee held or would have held if not for the adverse personnel action; or, as appropriate, to an equivalent position;
  - 2. reinstatement of full seniority rights;
  - 3. payment of lost compensation which includes both wages and benefits; and
  - other remedial measures necessary to effectuate a "make whole" remedy that addresses the effects of the adverse personnel action.
- C. "Inspector General" shall mean the Inspector General of the Port Authority.

D. "Officer" shall mean the following officers of the Port Authority: the Executive Director, Chief Financial Officer, Comptroller, General Counsel, Secretary and the Treasurer.

# E. "Public body" means:

- the United States Congress, any State legislature, or any popularly-elected local governmental body, or any member or employee thereof;
- 2. any federal, State or local judiciary, or any member or employee thereof, or any grand or petit jury;
- 3. any federal, State, or local regulatory, administrative or public agency or authority, or instrumentality thereof;
- 4. any federal, State or local law enforcement agency, prosecutorial office, or police or peace officer;
- 5. any federal, State or local department of an executive branch of government; or
- 6. any division, board, bureau, office, committee or commission of any of the public bodies described in the above paragraphs.

#### II. Instruction

A. No officer or employee of the Port Authority shall take an adverse personnel action with respect to another officer or employee solely as a result of, or in retaliation for, his or her: (i) making a truthful report of information concerning conduct which he or she knows or reasonably believes to involve corruption, criminal activity, conflict of interest, gross mismanagement, gross waste of funds or abuse of authority by another Port Authority officer or employee, which concerns his or her office or employment, or by persons dealing with the Port Authority, (collectively, "misconduct") to the Inspector General; (ii) objection to, and/or refusal to participate in misconduct; or (iii) cooperation with an investigation by a public body, including provision of information or If a reporting officer or testimony with respect to misconduct. employee wishes to disclose his or her identity, the officer or employee may do so. Confidentiality of the officer or employee submitting the report or complaint will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation. In the course of any investigation, the Inspector General or his designee may find it necessary to share information with others on a "need to know" basis.

- B. An officer or employee of the Port Authority who believes that another officer or employee has taken an adverse personnel action in violation of paragraph II.A. of this Instruction may report such action to the Inspector General in accordance with the procedures established by the Office of the Inspector General.
- C. Upon receipt of a report made pursuant to paragraph II.B. of this Instruction, the Inspector General shall conduct an inquiry to determine whether adverse personnel action has been taken in violation of paragraph II.A. herein.
- D. Within fifteen days after receipt of an allegation of a prohibited adverse personnel action, the Inspector General shall provide a written acknowledgement to the officer or employee making the allegation at the last known address reflected in official Port Authority records or any other address expressly provided in writing to the Inspector General by the officer or employee that the allegation has been received. Such notice shall include the name of the person in the Office of Inspector General who shall serve as a contact with the officer or employee making the allegation.
- E. Upon the completion of an investigation initiated under this Instruction, the Inspector General shall provide a written summary of the final determination to the officer or employee who complained of the retaliatory adverse personnel action. The summary shall include the Inspector General's recommendations, if any, for remedial action, or shall state the Inspector General has determined to dismiss the complaint and terminate the investigation. The Inspector General shall report any final determination to dismiss a complaint and terminate an investigation to the Audit Committee. The Audit Committee will, as warranted, take such action as is deemed appropriate.
- F. Upon a determination that adverse personnel action has been taken, the Inspector General shall without undue delay report his or her findings and, if appropriate, recommendations to (i) the Audit Committee; and (ii) the Executive Director. The Executive Director shall, without undue delay (i) determine whether to take remedial action, and (ii) report such determination on remedial action to the Audit Committee in writing, with a copy sent to the Inspector General. The Audit Committee will, as warranted, take such action as is deemed appropriate.
- G. A Port Authority officer or employee found to have violated this Instruction may be disciplined in the manner provided in the rules and regulations of the Port Authority.

- H. Nothing in this Instruction shall be construed to limit the rights of any Port Authority officer or employee with regard to any administrative procedure or judicial review.
- I. The Inspector General shall conduct ongoing educational efforts to inform Port Authority officers and employees of their rights and responsibilities as set forth under this Instruction. The Port Authority shall conspicuously display, and annually publish for all officers and employees, written or electronic notices of such rights and responsibilities and enforcement procedures.
- J. Not later than April thirtieth of each year, the Inspector General shall prepare and forward to the Executive Director and the Audit Committee a report on the complaints governed by this Instruction during the preceding fiscal year. The report shall include, but not be limited to, the number of complaints received pursuant to this Instruction, and the disposition of such complaints. Each report delivered pursuant to this paragraph II.J. shall be maintained in accordance with the requirements of the Port Authority's document retention Instruction.

# If you know something, say something.

Report fraud to the Office of Inspector General.

Reports remain strictly confidential

and can be made anonymously.

Employees are protected from retaliation under the Port Authority's Whistleblower Protection Policy (Al 20-1, 18)

To report, call: 973.565.4340

E-mail: InspectorGeneral - panyrų gov Fox - 975,565,6307

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