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BUREAU OF AUDIT

June 14, 2018

By Electronic Mail

Mitchell J. Silver, FAICP
Commissioner
New York City Department of Parks & Recreation
830 Fifth Avenue
New York, NY 10065

Re: Letter Audit Report on Wireless Internet Access in New York City Parks as provided by AT&T, Spectrum and Altice USA (Audit Number SZ17-138AL)

Dear Commissioner Silver:

This Letter Report contains the findings of our audit of the wireless internet (Wi-Fi)¹ services in New York City (City) parks provided by AT&T, Altice USA and Spectrum. The audit's objective was to determine whether the Wi-Fi provided by these vendors is operating effectively.

Background

The New York City Department of Parks and Recreation (Parks) maintains more than 30,000 acres of land across the five boroughs. This includes more than 1,700 parks, nearly 1,000 playgrounds, 51 recreational facilities, 15 nature centers and 14 miles of beaches. The Department of Information Technology and Telecommunications (DoITT) provides services designed to maintain the continuous, efficient and effective distribution of information technology (IT), infrastructure and telecommunications in the City. DoITT is responsible for maintaining the City's core IT infrastructure and systems that affect delivery of service to the City's residents, businesses, employees and visitors.

Public Wi-Fi service in New York City parks is provided by three different companies: AT&T; Altice USA (formerly Cablevision); and Spectrum (formerly Time Warner Cable). The determination of which specific parks will be provided with Wi-Fi hotspots² is a cooperative decision between the service provider, Parks and DoITT in consultation with the applicable borough president.

¹ Wi-Fi is a wireless networking technology that allows computers and other devices to communicate over a wireless signal.

² A hotspot is a specific location that provides Internet access via a wireless local area network (WLAN).

In June 2011, former Mayor Michael Bloomberg and AT&T's CEO Randall Stephen announced a five-year initiative to launch free Wi-Fi service in 26 locations located in 20 City parks across the five boroughs, including Bronx River Park, Prospect Park, Battery Park, Central Park, Flushing Meadows Corona Park and Clove Lake Park. In addition, in September 2011, the City renewed its franchise agreements with Time Warner Cable (currently known as Spectrum) and Cablevision (currently known as Altice USA) to include the requirement that these providers maintain the City's Wi-Fi system through 2020 in parks across the five boroughs. The service providers created a \$10 million fund to pay for the installation of Wi-Fi hotspots in City parks. Spectrum (then known as Time Warner Cable) and Altice USA (then known as Cablevision) agreed to expend \$6 million and \$4 million for the project respectively. Furthermore, as part of the franchise agreement renewals, the providers agreed to a variety of technology enhancements (e.g., upgrades) to public parks, community centers and the City's telecommunications infrastructure. The franchise agreements were negotiated by DoITT and unanimously approved by the City's Franchise and Concession Review Committee in August 2011. The agreements are expected to be maintained until July 18, 2020.

In July 2013, representatives of Parks, DoITT, Altice USA and Spectrum announced the public launch of Wi-Fi in 32 City parks across the five boroughs, including Bronx Park, Marine Park, Brownsville Recreation Center, Cadman Plaza Park, Jackie Robinson Park, Cunningham Park and Tappen Park. They also announced that additional park locations across the City would be launched on a rolling basis as a part of the program. Spectrum provides Wi-Fi services in City parks in Brooklyn, Queens, Manhattan and Staten Island. Altice provides Wi-Fi services in City parks in Brooklyn and the Bronx.

Parks' website provides a list of parks by borough and area(s) within the park with Wi-Fi hotspots along with its corresponding provider. According to Parks' website, there are currently 113 parks with Wi-Fi hotspots provided by AT&T, Spectrum or Altice USA. These providers deliver Wi-Fi hotspots to 23 City parks in Queens, 28 in Brooklyn, 32 in Manhattan, 21 in the Bronx and 9 in Staten Island. Wireless internet access from these providers in City parks is available on a free or limited-free basis. AT&T provides free service to all users at all times via the Service Set Identifier³ (SSID) "attwifi". Altice USA and Spectrum provide free and limited-free service via the SSID "GuestWiFi". Altice USA provides free service at all times to its Optimum Online subscribers and Spectrum provides free service at all times to its broadband subscribers. Subscribers may sign in to the network using their subscription information. Altice USA and Spectrum also provide limited-free service to non-subscribers. Non-subscribers can either connect for three free 10-minute sessions every 30 days or purchase a \$.99 per day pass.

Audit Findings

We tested all 113 parks across the five boroughs with Wi-Fi hotspots provided by AT&T, Altice USA or Spectrum that were listed on Parks' website. We found that overall, the Wi-Fi

³ Service Set Identifier (SSID) is the name assigned to a Wi-Fi network.

services provided by these providers generally operated as intended. The Wi-Fi network operated effectively in 95 out of 113 (84 percent) City parks. We were able to connect to the wireless network and browse various websites such as news, entertainment and social media. Furthermore, the networks allowed access to websites that allow users to stream music or videos such as Netflix, YouTube, Hulu, Pandora and TuneIn.

However, we found that the Wi-Fi network did not operate effectively in 18 out of 113 (16 percent) City parks. Four of these parks were in Queens (Macdonald Park, Forest Park, Kissena Park and Astoria Park); five in Brooklyn (Hillside Park, Brooklyn Bridge Park, Carroll Park, Poseidon Playground and Dyker Beach Park); three in Manhattan (Chelsea Park, the High Line and Verdi Square); three in the Bronx (Fox Playground, Devoe Park and Pelham Bay Park) and three in Staten Island (Wolfe's Pond Park, Greenbelt Native Plant Center and Ocean Breeze Park). (See Table I, which follows.)

TABLE I

Parks' Locations in New York City with Wi-Fi That Did Not Operate

Borough	Park Name	Date Tested	Area(s) with Wi-Fi	Wi-Fi Provider(s)	Wi-Fi	Analysis/Comments
Queens	Astoria Park	11/13/2017	Track, Ballfields	AT&T	No	Unable to connect to "attwifi".
Queens	Kissena Park	11/14/2017	Entire Park, Colden St ballfields and basketball courts, Kissena Blvd ballfields and Velodrome	Spectrum	No	Unable to connect to "GuestWiFi".
Queens	Macdonald Park	11/13/2017	Entire Park	AT&T	No	Unable to connect to "attwifi".
Queens	Forest Park	11/14/2017	The Overlook along Park Ln, Outside the Overlook near playground	Spectrum	No	Unable to find "GuestWiFi".
Brooklyn	Hillside Park	11/20/2017	Near Vine St and Columbia Heights	AT&T	No	Unable to find "attwifi".
Brooklyn	Poseidon Playground	2/2/2018	Near MCU Park Brooklyn Cyclones Stadium	Altice USA	No	Unable to find "GuestWiFi".
Brooklyn	Dyker Beach Park	3/1/2018	Near Basketball Courts and Ballfields	Spectrum	No	Unable to find "GuestWiFi".
Brooklyn	Carroll Park	11/21/2017	South End Near Carroll St	Spectrum	No	Unable to find "GuestWiFi".
Brooklyn	Brooklyn Bridge Park	11/20/2017	Near Atlantic Ave and Brooklyn Queens Expressway	AT&T	No	Unable to find "attwifi".

Borough	Park Name	Date Tested	Area(s) with Wi-Fi	Wi-Fi Provider(s)	Wi-Fi	Analysis/Comments
Bronx	Pelham Bay Park	3/9/2018	Aileen B Ryan Rec Complex, Middletown Rd Ballfields and Parking Lot	Altice USA	No	Unable to connect to "GuestWiFi".
Bronx	Devoe Park	3/5/2018	Near Tennis Courts	AT&T	No	Found "attwifi", however the Get Connected button on the log in page did not work.
Bronx	Fox Playground	3/5/2018	South Side of Park	Altice USA	No	Unable to find "GuestWiFi".
Staten Island	Wolfe's Pond Park	3/13/2018	Near waterfront along Chester Ave	Spectrum	No	Unable to find "GuestWiFi".
Staten Island	Greenbelt Native Plant Center	3/13/2018	Ballfield and Parking Area, First and Second Floor	Spectrum	No	Unable to find "GuestWiFi"
Staten Island	Ocean Breeze Park	3/13/2018	Restaurant Area	AT&T	No	Unable to connect to "attwifi".
Manhattan	Chelsea Park	4/9/2018	Near W 27th St and 10th Ave	Spectrum	No	Unable to find "GuestWiFi".
Manhattan	Verdi Square	4/5/2018	Entire Park	Spectrum	No	Unable to find "GuestWiFi".
Manhattan	The High Line	4/9/2018	Near W 23rd St	AT&T	No	Unable to find "attwifi".

As shown in Table I, we were unable to connect to the Wi-Fi on eight of the Spectrum services, seven AT&T services, and three Altice USA services throughout the five boroughs. According to each provider's agreement, each will provide the services with the same download and upload capability as the basic Wi-Fi services provided to residential and broadband internet subscribers. As with residential and broadband internet capability, services can be interrupted due to various factors such as weather and installation (nearby construction) and we found that the inability to connect was a sporadic and not a continuous issue. However, each provider should ensure that the Wi-Fi is working and that no subscriber should be charged \$.99 if they had exceeded the 10-minute limit trying to connect to the Wi-Fi.

Recommendation

We recommend that AT&T, Altice USA and Spectrum periodically perform testing to ensure that their respective wireless networks are consistently operating effectively.

Scope and Methodology

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope period of this audit was June 1, 2017, through April 09, 2018. Our audit reviewed parks with Wi-Fi that were reportedly operational during our scope period.

To achieve our objective, we used cellular phones and tablets to test Wi-Fi services provided by AT&T, Altice USA and Spectrum in City parks in Queens, Brooklyn, Bronx, Manhattan and Staten Island that were listed as operational on Parks' website. Our testing was conducted between November 13, 2017 and April 09, 2018. During our testing we established a Wi-Fi connection and browsed various websites to ensure functionality. We took screenshots displaying Wi-Fi connectivity on the phone.

To determine the requirements regarding access to public Wi-Fi in City parks, we reviewed the City's franchise letter agreements with AT&T, Spectrum and Altice USA.

To determine the location of parks with Wi-Fi hotspots that were operational during our scope period, we reviewed Parks' website to determine the park and location of hotspots in the parks. (See Appendix I for listing of all Parks with Wi-Fi.)

To determine accessibility to Wi-Fi hotspots in City parks, auditors signed into the public Wi-Fi network and attempted to access various websites while connected to the Spectrum and Altice USA's "GuestWiFi" network or AT&T's "attwifi" network.

To determine the accessibility of social media websites while connected to the Wi-Fi network in City parks, the auditors downloaded Yahoo, Google, Facebook, Twitter and Snapchat to cellular devices and attempted to read mail and send messages. We also attempted to access Netflix, Pandora, Hulu, TuneIn, Vudu and YouTube to determine if it was possible to watch movies, play music and stream videos.

Testing was performed Monday through Sunday at various times during park hours to

ensure that Wi-Fi operated effectively. In addition, we tested service in inclement weather to determine the effect on Wi-Fi service.

The issues covered in this report were discussed with Parks and DoITT officials during and at the conclusion of this audit, and both agreed that an exit conference was not necessary. Parks officials were notified during the audit of any issues we found with Wi-Fi connectivity. On May 16, 2018, we submitted a draft letter report providing Parks the opportunity to formally respond. Parks' response was received on May 31, 2018. In its written response, Parks agreed with the report's findings. Parks stated, "We are pleased with your finding that, overall, the Wi-Fi services generally operated as intended." In response to our recommendation that the three Wi-Fi service providers periodically perform testing to ensure that their respective wireless networks are consistently operating effectively, Parks stated that it had spoken with DoITT and is "prepared to assist where possible in order to ensure that the wireless networks in our parks are operating as effectively as possible."

The full text of Parks' comments is included as an addendum to this report.

Sincerely,



Marjorie Landa

- c: David Cerron, Chief Accountant
- Danielle Seeley, Project Manager, Parks Revenue
- Michael Pastor, Deputy Commissioner and General Counsel, DoITT
- Denise Raymond, Program Quality Oversight Lead, DoITT
- Emily Newman, Acting Director, Mayor's Office of Operations
- George Davis III, Deputy Director, Mayor's Office of Operations



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ADDENDUM
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May 31, 2018

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City of New York Office of the Comptroller
1 Centre Street, Room 1100
New York, NY 10007

Re: Draft Letter Audit Report on Wireless Internet Access in New York City's Parks as provided by AT&T, Spectrum and Altice USA (Audit Number SZ17-138AL)

Dear Deputy Comptroller Landa:

This letter addresses the findings and recommendation contained in the New York City Comptroller's Draft Letter Audit Report ("Report"), dated May 16, 2018, on the above subject matter.

As your Report notes, public Wi-Fi service in New York City parks is provided by three different companies: AT&T, Altice USA, and Spectrum. The determination of which specific parks are provided with Wi-Fi hotspots is a cooperative decision between the service provider, Parks and the NYC Department of Information Technology and Telecommunications (DoITT), in consultation with the applicable borough president. Your Report notes that all 113 NYC Parks sites throughout the City with Wi-Fi hotspots were tested and we are pleased with your finding that, overall, the Wi-Fi services generally operated as intended. While the Wi-Fi network operated effectively at 95 parks, at the time of your tests, it was not operating effectively at 18 parks.

In reference to the Report's recommendation:

Recommendation: We recommend that AT&T, Altice USA and Spectrum periodically perform testing to ensure that its corresponding wireless network is consistently operating effectively. Parks has spoken about this matter with DoITT and we are prepared to assist where possible in order to ensure that the wireless networks in our parks are operating as effectively as possible.

Parks wishes to thank you and your audit staff for the time and effort devoted to completing this Report.

Sincerely,

David Cerron
Chief of Revenue, Concessions & Controls Oversight