Councillor Brian Mayes
Council Building
510 Main Street
Winnipeg, Manitoba
R3B 1B9

December 7th, 2018

Dear Councillor Brian Mayes,

As per our discussion, recent changes in the Planning, Property & Development (PPD) Department have dramatically hindered the day to day operations of the mobile sign industry.

As like-minded business owners, we are jointly submitting this as a group consisting of the larger, professionally run mobile sign companies operating in the City of Winnipeg for 25+ years:

1. React Mobile Sign Rentals Inc.
2. Canada Plus Signs
3. All-Around Signs

Specifically, we ask you to refer to the enclosed letter that was sent on June 7th, 2018 from the zoning and permits branch within the Planning, Property & Development (PPD) Department.

Background

Our companies lease billboard advertising signs to small/medium & large businesses, corporations, schools, non-profits, religious institutions, charities and various City of Winnipeg departments. As per existing by-laws, we are required to obtain a mobile sign permit for each sign that is erected. Permits are issued for either 14, 30 or 90 days after which the permit may be renewed, or the sign must be removed.

On average, our 3 company's alone hold approximately 300 permits each month at an average permit fee of $68.00/month. We consistently contribute approximately $250,000 annually in direct revenues to the City of Winnipeg based on the permit fees alone. As an entire industry, we are responsible for contributing over $500,000 annually into the city's revenues.

As professionally run mobile sign rental companies, we believe in providing end users with an affordable way to advertise their business or organization. Moreover, we are committed to maintaining the sign hardware (i.e. the frame) as well as the quality of the lettering to ensure the signs look professional, clean and respect the aesthetic objectives of city planners.

Current Arrangement

The current arrangement between the PPD department and the sign companies allowed both parties to improve efficiency and operate economically. The following guidelines were generally accepted as standard practice and were not subject to fines and penalties:

1. Customer Request - The customer requesting the sign must have the approval of the property manager/owner
2. Site Verification - The mobile sign company verifies (by phone or email) with PPD that the site is permitted for mobile signs and permit days are available

3. Installation & Permit Application - The sign may be installed at the above site provided the permit application is submitted (by email or fax) within 1(one) business day of installation, but not necessarily issued by the PPD department
4. Permit Renewals or Removal - A permit renewal must be submitted, or the sign must be removed within 1 business day of expiration
5. Enforcement - Previously carried out by the PPD department and open lines of communication often resolved misunderstandings such as weather conditions, expired permits, etc.

Future Proposed State
Recent changes in enforcement of the bylaw (please refer to the enclosed letter) raises a number of operational issues for the sign companies. Below, we have highlighted some of the key changes, how they impact operations and our recommendations:

1. Permit Application Processing
Future Proposed State: Signs cannot be installed without a permit being issued.

Operational Issue: Permit Applications can be delayed for 3-7 business days in cases where PPD staff are sick, on leave or on vacation. Often, there is minimal coverage in periods of absences and this impacts how fast permits are issued. When permits are delayed at PPD, this impedes how sign companies can schedule installations and our clients become frustrated as we cannot provide them with an exact install date once they have agreed to a sign.

Recommendation: Allow for installation of the mobile sign once the permit application has been submitted but not approved due to delays/absences within the PDD department AND where e-mail or phone communication has been provided stating that a permit is available.

2. Permit Expiry
Future Proposed State: Signs must be removed/taken down with no grace period or exceptions upon the expiry of the permit.

Operational Issue:
1. In certain cases, once the permit is issued, external factors such as weather, site access, construction, etc.prevents us from installing the sign on the first day of the permit. We are forced to delay the installation by 1 or 2 days and the customer ends up losing permit days upon expiration of permit.
2. Permits are sometimes issued in the middle, or at the end of the business day, where we cannot accommodate the install into our existing schedule. In some cases, the next business day is up to 3 days away. The customer again ends up losing permit days.

Recommendation: Due to the external factors and the nature of the business of installing signs we believe that upon request AND based on a valid business/operational reason, the PDD department should allow for a grace period by extending the permit for 1-2 business days at the end of the period.

3. Fines & Penalty notices
Future Proposed State:
1. Fines issued for expired permits on sites with active renewals.
2. Fines are issued to the end customer directly by mail.
3. Fines are issued upon expiration of permits on weekends & holidays.

Operational Issue:

1. Renewals on Permits - When a sign rental is renewed for the same customer or at the same site, the mobile sign is expected to come down while the permit is processed. We are diligent in ensuring renewal permits are filled in advance. However, our end-clients only notify us of a renewal 1-2 days before the existing permit is expiring. In these cases, we are expending significant amounts of time, labour and expenses to retrieve the sign to only re-install it the next day or day after.
2. Notice of Fines - Mobile sign company's have no visibility or communication of the fines/violations until notified by the end customer. By the time we are made aware of the penalty, we only have a few days to pay the reduced fine or dispute the violation which places us in a defenseless position.
3. Weekend/Holiday Enforcement - Permits are deemed valid until midnight of the last permit day. The obvious challenge here is that if the permit expires on the weekend, this puts an unrealistic expectation on our staff(s) to remove the sign first thing on Monday morning. In these situations, mobile sign companies are forced to remove the sign before end of day Friday in order to avoid a fine but also causes our customers to lose a permit day(s) which they paid for.

Recommendation: Fines for non-compliance based on the above identified scenarios should not be issued. Further, if a valid violation occurs, we ask to be copied on any communication as the provider of the sign(s) so we can address this with our customer and ensure a payment/response is made in a timely manner.

4. Prohibiting Coloured Letters

Future Proposed State: As part of the letter, the PPD department has indicated that only black/white letters would be permitted as of January 1, 2019.

Operational Issues:

1. Demand for Coloured Letters - Consistently, customers have showed a strong demand for coloured letters & symbols and very few customers request the black/white letters. Listening to customers is paramount to any business, and our industry is no different. Allowing only black/white letters would go against customers' needs and may ultimately drive them away from using mobile signs all together.
2. No Enforcement of Coloured Letters - While we appreciate that "black/white letters only" was always part of the by-law, there has been an unwritten understanding between enforcement and the mobile sign companies that penalties will not be levied for use of coloured letters. Since this policy has NEVER been enforced, sign companies have built up significant inventory in response to customer's demands. In fact, over 80% of all letter inventory is held in coloured letters and symbols.
3. Significant Financial Burden - This shift to black/white letters will pose a significant financial hardship on the mobile sign companies. We would be forced to discard over 80% of all inventory and print new letters. The costs of this scenario would open up serious consideration about closing our businesses completely.

Recommendation: Allowing the use of black/white AND coloured letters and symbols to match end user preferences.

5. Allowing Graphic Signs

Future Proposed State: As part of the letter, the PPD department has not provided any clarity on the use of Graphic Signs (i.e. mini billboards) as of January 1, 2019.

Operational Issues: Over the past few years, mobile sign companies have introduced the concept of graphic signs. These signs are full colour graphic billboard style advertising signs (i.e. they do not contain any physical letters that are placed on the board). If these types of signs will be allowed, then we require clarity so that appropriate operational decisions can be made.

Recommendation: Allowing the use of Graphic Signs to match end user preferences.

6. Wooden Frame Graphic Signs

Future Proposed State: Constitute clarity between wooden framed signs and metal framed graphic signs.

Operational Issues: It has come to our attention that graphic style signs with a wooden frame (i.e. McDonald's, Tim Horton's, etc) do not require a PPD permit. Not requiring a permit allows for these signs to be placed on property where mobile signs are not permitted in accordance to a variety of City of Winnipeg By-Laws. Both styles of signs advertise in an identical manner nevertheless we as mobile sign companies must abide to City of Winnipeg By-Laws and can not provide the same level of customer satisfaction.

Recommendation: We are requesting information as to why the permit requirements differ.

Summary

As noted previously in this letter, we are fully on board with the objectives of the PPD policy. However, we would ask the PPD to consider the following:

1. Allow the use of BOTH coloured and black/white letters and symbols
2. Allow the use of GRAPHIC SIGNS (i.e. mini bill boards)
3. Advise the differences between WOODEN FRAME AND METAL FRAME graphic signs in accordance to City of Winnipeg By-Laws.
4. Allow for installation of the mobile sign once the permit application has been submitted but not approved due to delays/absences within the PDD department
5. Allow for a GRACE PEROID FOR REMOVAL OF SIGNS once the permit is expired (i.e. up to 2 business days maximum)
6. Ensure STRONG ENFORCEMENT of mobile signs that are erected without permits. We are united in the belief that ALL violators should be held to account

We agree with the primary objectives and intent of the letter received from the PPD department. However, we respectfully believe that modifications are required to the current by-laws and wish to engage in a discussion to alter the approach and specifics of achieving the departments stated objectives. With open dialogue and mutual consideration of both parties' objectives and operations, we can satisfactorily achieve the desired outcomes for the City of Winnipeg and mobile sign rental companies.

Respectfully,

Bhadresh R. Bhatt	Grant Fraser	Mitch Prud'homme
React Mobile Signs Inc.	Canada Plus Signs	All-Around Signs

Cc/
Stan Dueck
Tim van der Hoek
Martin Grady