

AGENDA

TOWING INDUSTRY ADVISORY COMMITTEE

THE CORPORATION OF THE CITY OF MISSISSAUGA

MONDAY, DECEMBER 1, 2014 - 9:30 A.M.

COUNCIL CHAMBERS SECOND FLOOR, CIVIC CENTRE

300 CITY CENTRE DRIVE, MISSISSAUGA, ONTARIO, L5B 3C1 www.mississauga.ca

Members

Councillor Ron Starr, Ward 6 (Chair)
John C. Lyons, Citizen Member (Vice Chair)
Councillor Nando Iannicca, Ward 7
Mark Bell, Citizen Member
Daniel Ghanime, Citizen Member
Tullio (Tony) Pento, Citizen Member
Armando Tallarico, Citizen Member
Daniel R. Wallace, Citizen Member

Contact: Stephanie Smith, Legislative Coordinator
Office of the City Clerk 905-615-3200 ext. 3795 Fax 905-615-4181
Stephanie.Smith@mississauga.ca

CALL TO ORDER

APPROVAL OF AGENDA

DECLARATIONS OF CONFLICT OF INTEREST

PRESENTATIONS/DEPUTATIONS

MATTERS TO BE CONSIDERED

1. <u>Minutes of Previous Meeting</u>

Towing Industry Advisory Committee meeting minutes from June 10, 2014.

RECOMMEND APPROVAL

2. <u>By-law to Prohibit Solicitation at an Accident Scene for all Non-Tow Truck Related</u> Persons

Members of the Towing Industry Advisory Committee (TIAC) to discuss the Corporate Report dated November 19, 2014 from the Commissioner of Transportation and Works with respect to a by-law to prohibit solicitation at an accident scene for all non-tow truck related persons.

RECOMMENDATION

- 1. That the report from the Commissioner of Transportation and Works, dated November 19, 2014 and entitled "By-law to Prohibit Solicitation at an Accident Scene for all Non-Tow Truck Related Persons" be received.
- 2. That staff incorporate comments received from the Towing Industry Advisory Committee into a report for consideration by General Committee for the recommended drafting of an accident scene solicitation by-law.

3. <u>Two Tier Tow Truck Licensing System</u>

Members of the Towing Industry Advisory Committee (TIAC) discuss the Corporate Report November 20, 2014 from the Commissioner of Transportation and Works with respect to amendments to the Tow Truck Licensing By-law 521-04, as amended, to include a two tier tow truck licensing system.

RECOMMENDATION

- 1. That the report from the Commissioner of Transportation and Works, dated November 20, 2014 and entitled "Amendments to the Tow Truck Licensing Bylaw 521-04, as amended, to include a Two Tier Tow Truck Licensing System" be received.
- That staff incorporate comments received from the Towing Industry Advisory
 Committee into a report for consideration by General Committee for amendments
 to the Tow Truck Licensing By-law 521-04, as amended, to include a two tier tow
 truck licensing system.

4. Forms in Tow Trucks

Daryl Bell, Manager, Mobile Licensing Enforcement to provide a verbal update regarding forms in tow trucks.

5. Bill 15

Daryl Bell, Manager, Mobile Licensing Enforcement to provide a verbal update regarding Bill 15.

6. 2015 Towing Industry Advisory Committee Meeting Dates

Memorandum dated November 17, 2014 from Stephanie Smith, Legislative Coordinator with respect to the proposed 2015 Towing Industry Advisory Committee meeting dates.

7. Towing Industry Advisory Committee Action List

Action list of the Towing Industry Advisory Committee meeting held on June 10, 2014 provided to the Committee to provide an update on the status of initiatives raised at prior meetings.

OTHER BUSINESS

DATE OF NEXT MEETING - Tuesday, February 17, 2014

ADJOURNMENT



MINUTES

TOWING INDUSTRY ADVISORY COMMITTEE

THE CORPORATION OF THE CITY OF MISSISSAUGA

TUESDAY, JUNE 10, 2014 - 9:02 A.M.

COUNCIL CHAMBERS

SECOND FLOOR, CIVIC CENTRE

300 CITY CENTRE DRIVE, MISSISSAUGA, ONTARIO, L5B 3C1
www.mississauga.ca

Members Present:

Councillor Ron Starr, Ward 6 (Chair)

John C. Lyons (Citizen Member) (Vice Chair)

Councillor Nando Iannicca, Ward 7

Mark Bell (Citizen Member)

Daniel Ghanime (Citizen Member)

Tullio (Tony) Pento (Citizen Member)

Armando Tallarico (Citizen Member)

Daniel R. Wallace (Citizen Member)

Staff Present:

Mickey Frost, Director, Enforcement

Daryl Bell, Manager, Mobile Licensing Enforcement Stephanie Smith, Legislative Coordinator, Office of the

City Clerk

Contact: Stephanie Smith, Legislative Coordinator
Office of the City Clerk 905-615-3200 ext. 3795 Fax 905-615-4181
Stephanie.Smith@mississauga.ca

CALL TO ORDER – 9:02 A.M.

APPROVAL OF AGENDA

DECLARATIONS OF CONFLICT OF INTEREST

PRESENTATIONS/DEPUTATIONS

MATTERS TO BE CONSIDERED

1. <u>Minutes of Previous Meeting</u>

Towing Industry Advisory Committee meeting minutes from May 6, 2014.

APPROVED (Councillor Iannicca)

2. <u>By-law to Prohibit Solicitation at an Accident Scene for all Non-Tow Truck Related Persons</u>

Members of the Towing Industry Advisory Committee (TIAC) discussed the Corporate Report dated April 24, 2014 from the Commissioner of Transportation and Works with respect to a by-law to prohibit solicitation at an accident scene for all non-tow truck related persons.

Daniel Ghanime, Citizen Member expressed concerns with the proposed amendments as it resembles the City of Hamilton towing by-law and noted that it would restrict tow trucks at an accident scene.

Daniel R. Wallace, Citizen Member expressed concerns with the proposed amendments as it would prohibit tow truck drivers from doing their job at an accident scene and that limitations would be placed on drivers.

Mark Bell, Citizen Member expressed concerns with the proposed amendments. He spoke to the current City of Mississauga towing by-law and current practices at an accident scene.

Todd Keely, TLK Towing expressed concerns and spoke to the negative effects of not allowing solicitation at an accident scene.

Daryl Bell, Manager, Mobile Licensing Enforcement provided clarification regarding the proposed amendments and noted that the current by-law already has a non-solicitation

June 10, 2014

rule and that the proposed amendments are restricting other individuals from soliciting at an accident scene.

Members of the Committee provided clarification of the steps involved of clearing an accident scene and the involvement of the Peel Regional Police (PRP) at an accident scene.

Daniel R. Wallace, Citizen Member spoke to the recent encryption of the PRP radio as this is a major concern for industry members as drivers are not able to do their job.

Councillor Iannicca and Councillor Starr noted the need for more information and documentation on this matter and the need for it to come back for discussion.

Michael Hoady (sp), MVC Towing spoke to the proposed amendments and inquired who would be effected and if insurance companies are included in the prohibition of solicitation. Daryl Bell noted that this by-law is strictly at an accident scene when solicitation occurs within two hundred meters of the collision and insurance companies would be included.

Daniel Ghanime, Citizen Member spoke to the difficulties of restricting insurance companies at an accident scene and expressed concerns with the proposed amendments to the by-law as it would affect tow truck drivers.

RECOMMENDATION

That the matter of a by-law to prohibit solicitation at an accident scene for all non-tow truck related persons be deferred to a future Towing Industry Advisory Committee meeting.

<u>Deferred</u> (Councillor Iannicca)
Recommendation TIAC-0011-2014

3. Two Tier Tow Truck Licensing System

Members of the Towing Industry Advisory Committee (TIAC) discussed the Corporate Report December 4, 2013 from the Commissioner of Transportation and Works with respect to amendments to the Tow Truck Licensing By-law 521-04, as amended, to include a two tier tow truck licensing system.

Mickey Frost, Director, Enforcement noted that the report had been brought back for the Committees approval.

Mark Bell, Citizen Member expressed support of the report but wanted closed borders added to the report before it is approved. Daryl Bell, Manager, Mobile Licensing Enforcement noted that the two tier licensing system addresses Mark Bell's concerns and that staff discussed with Legal to include closed borders; however, that requirement is a huge challenge.

Members of the Committee engaged in conversation regarding the City of Brampton, Town of Caledon and the City of Toronto being closed borders.

Mickey Frost noted that this report would be brought back with clarity on including closed borders.

Todd Keely, TLK Towing expressed support for the two fier licensing system with the inclusion of closed borders and a registered vehicle pound facility in Mississauga.

RECOMMENDATION

That the matter of a by-law to amend the Tow Truck Licensing By-law 521-04, as amended, effective January 1, 2015, to include a two tier tow truck licensing system, more specifically "General Towing for Hire" and "Contract Towing Not for Hire" be deferred to a future Towing Industry Advisory Committee meeting.

<u>Deferred</u> (Councillor Jannicca)

Recommendation TIAC-0012-2014)

4. Towing Industry Advisory Committee Action List

Members of the Towing Industry Advisory Committee meeting reviewed the action list as presented.

RECOMMENDATION

That the action list of the Towing Industry Advisory Committee meeting held on June 10, 2014 provided to the Committee to update on the status of initiatives raised at prior meetings be received.

Received (Councillor Iannicca)
Recommendation TIAC-0013-2014

Daniel R. Wallace, Citizen Member addressed concerns on behalf of the industry regarding the recent encryption of the Peel Regional Police (PRP) radio scanners. He spoke to the loss of revenue and hazardous conditions this would create on the residents of the City of Mississauga.

Mickey Frost, Director, Enforcement noted that staff were advised that the PRP upgraded their radio system for the safety of their officers. He further noted that the City of Mississauga does not have jurisdiction over this matter as it is a Region of Peel matter.

Councillor Starr suggested that members of the industry make a deputation at a Region of Peel or PRP meeting to address their concerns.

DATE OF NEXT MEETING - At the call of the Chair

ADJOURNMENT - 9:56 A.M.



Clerk's Files

Originator's Files

> Towing Industry Advisory Committee DEC 0 1 2014

DATE:

November 19, 2014

TO:

Chair and Members of the Towing Industry Advisory Committee

Meeting Date: December 1, 2014

FROM:

Martin Powell, P. Eng.

Commissioner of Transportation and Works

SUBJECT:

By-law to Prohibit Solicitation at an Accident Scene for all

Non-Tow Truck Related Persons

- **RECOMMENDATION:** 1. That the report from the Commissioner of Transportation and Works, dated November 19, 2014 and entitled "By-law to Prohibit Solicitation at an Accident Scene for all Non-Tow Truck Related Persons" be received.
 - 2. That staff incorporate comments received from the Towing Industry Advisory Committee into a report for consideration by General Committee for the recommended drafting of an accident scene solicitation by-law.

BACKGROUND:

Staff have concerns regarding the solicitous behaviour of various industry members at accident scenes. Individuals from industries such as auto body shops, car rental agencies and personal injury consultants take advantage of the stressful accident situation and attempt to coerce vulnerable people who are in a state of shock and confusion to sign agreements, contracts and work orders and to make otherwise rash decisions.

The Tow Truck Licensing By-law 521-04, as amended, has prohibitions for any solicitation, coercion or suggestion by a tow truck driver at an accident scene. This section of the by-law gives officers the means to deal with tow truck drivers who have been attempting to solicit on behalf of various body shops, rental agencies, injury therapists and lawyers. The increased enforcement of the Tow Truck Licensing By-law 521-04, as amended, has resulted in an increase in the number of non towing related private individuals who operate outside of the by-law and interfere at accident scenes. Mobile Licensing Enforcement staff receives complaints on a regular basis from stakeholders, which includes tow truck drivers, the insurance industry, other enforcement agencies and the public, who are frustrated with the actions of these individuals. The stakeholders are left feeling further frustrated when informed that staff cannot offer any assistance with the complaints because the private individuals and their actions are not regulated by any City by-laws.

COMMENTS:

Staff have reviewed the practices of Oakville, Burlington, Hamilton, Milton, Brampton, Toronto and Vaughan. All of the aforementioned municipalities have by-laws, which prohibit solicitation by tow truck owners and drivers. The cities of Toronto and Vaughan include in their by-laws a clause that prohibits any person from soliciting services on behalf of a tow truck driver or owner.

The City of Hamilton has passed a stand-alone by-law restricting solicitation or conveyance of an offer of business services or goods to any driver or person involved in an accident or apparent accident scene. The Mississauga Tow Truck Licensing By-law 521-04, as amended, has provisions to restrict solicitation at an accident scene by tow truck drivers and owners within a 200 metre (656 feet) radius. A stand-alone solicitation by-law would give staff and other enforcement agencies the tools required to manage and enforce unlicensed individuals who are circumventing the system and taking advantage of people in these vulnerable situations.

FINANCIAL IMPACT:

This has no financial impact on the City of Mississauga.

CONCLUSION:

Staff have conducted a review of the surrounding municipalities regarding concerns arising from solicitation practices at accident scenes and staff recommend the drafting of a by-law to prohibit

solicitation at an accident scene for all non-tow truck related persons. Staff further recommends that the by-law be drafted to mirror the non-solicitation requirements of the Tow Truck Licensing By-law 521-04, as amended, and state that no person shall engage in any form of solicitation within 200 metres (653 feet) of a collision scene.

Martin Powell, P. Eng.

Commissioner of Transportation and Works

Prepared By: Daryl Bell, Manager, Mobile Licensing Enforcement



Clerk's Files

Originator's Files

Towing Industry Advisory Committee

DEC 0 1 2014

DATE:

November 20, 2014

TO:

Chair and Members of the Towing Industry Advisory Committee

Meeting Date: December 1, 2014

FROM:

Martin Powell, P. Eng.

Commissioner of Transportation and Works

SUBJECT:

Amendments to the Tow Truck Licensing By-law 521-04, as amended, to include a Two Tier Tow Truck Licensing System

RECOMMENDATION: 1.

- 1. That the report from the Commissioner of Transportation and Works, dated November 20, 2014 and entitled "Amendments to the Tow Truck Licensing By-law 521-04, as amended, to include a Two Tier Tow Truck Licensing System" be received.
- 2. That staff incorporate comments received from the Towing Industry Advisory Committee into a report for consideration by General Committee for amendments to the Tow Truck Licensing By-law 521-04, as amended, to include a two tier tow truck licensing system.

REPORT HIGHTLIGHTS:

- Issues have been raised as a result of tow truck companies operating in the city without a registered vehicle pound facility (VPF) located in Mississauga.
- The Canadian Automobile Association (CAA) requested a licence type allowing them to perform their business as a contract towing operator, and to handle industry related dispatched calls; their purpose is not to chase accidents.

- Numerous, private, "not for hire" tow trucks are towing for scrap and company use, without the requirements of licensing and proper inspections.
- Mobile Licensing Enforcement previously started a process to accept a letter to set the terms for tows conducted by towing companies located outside Mississauga and not having a VPF located in Mississauga, notwithstanding the requirements of the Tow Truck Licensing By-law 521-04, as amended.
- A two-tier licence system provides protection for the public, will more effectively regulate chase and contract tow trucks, and will address concerns with unlicensed and possibly unsafe tow trucks operating on Mississauga roads.

BACKGROUND:

Concerns have been raised by staff and the insurance industry regarding the issue of tow truck companies who are not located in Mississauga and who do not have a registered VPF located in Mississauga, which contravenes the requirements of the Tow Truck Licensing By-law 521-04, as amended. The by-law requires that the tow truck driver take the vehicle to their registered VPF located in Mississauga, or to a location at the direction of the hirer.

Notwithstanding the requirements of the by-law, past practice by previous management was to accept a letter from tow truck companies located outside the boundaries of Mississauga stating that the tow rates they would charge would not be more than what is permitted within Mississauga, in accordance with the by-law. This practice was originally put in place to allow contract tow truck companies, like the CAA, whose intention was not to operate as a chase truck, to operate in Mississauga, despite being located outside city boundaries. However, this resulted in a number of general towing companies with chase trucks being granted the same authority as regular chase trucks that are located within Mississauga and have a registered VPF in Mississauga.

CAA and other contract tow truck companies operate on a dispatch call system for their customers under prearranged contracts to service their clients.



In early 2013, the present Manager of Mobile Licensing Enforcement recognized issues with the past practice for regulating contract towers. The Manager of Mobile Licensing Enforcement began to remedy the situation due to the number of non-contract tow truck companies that were operating in Mississauga from cities such as Brampton, and as far away as Orillia, which did not maintain a registered VPF in Mississauga. Moreover, staff streamlined the process to license the tow trucks in compliance with the licensing by-law and insisted that to be licensed they must have a registered VPF in the City of Mississauga. This caused concerns for a number of contract tow truck companies who operate without a registered VPF and only tow the vehicle following the owner's directions. Due to concerns caused by the change, staff granted conditional licences to tow vehicles to the tow truck companies that operate in Mississauga without a registered VPF located in Mississauga, provided they were not charging for storage.

A representative from the CAA attended the Public Vehicle Advisory Committee (PVAC) meeting of June 11, 2013 to raise their concerns and PVAC directed staff to bring forward a report on this issue. Staff met with representatives of the CAA on September 25, 2013 and discussed their concerns, including staff's proposal to consider a two tier licence system for "contract" also known as "not for hire" tow trucks and "general" tow trucks also known as "chase" tow trucks. CAA representatives agreed that this would be an acceptable solution as this would ensure that the CAA could continue to serve their customers in the City of Mississauga and that the tow truck drivers that operate for the CAA would be prohibited from operating as chase tow trucks.

Staff further identified concerns with private tow trucks operating scrap towing and other private contract towing businesses without the requirements of licensing and proper inspections, which ensures both consumer protection and public safety.

Staff also met with representatives from various licensed tow truck companies that are located and operate in Mississauga, and maintain VPF's in the city. The consensus was that this change would benefit both sides of the industry.

COMMENTS:

Staff reviewed the surrounding municipalities and found that none have specific licence types for the operation of contract tow trucks versus general tow trucks. Staff carefully reviewed the industry concerns and found the best solution. In staff's view, the best solution would be a separate licence type to allow contract towing, which for the most part are companies that are located outside of Mississauga, do not have a VPF in Mississauga and operate under pre-arranged contracts for their customers/hirers who provide directions to the tow truck driver. This type of operation does not meet the current requirements of the by-law, but the addition of a "Contract Towing Not For Hire" licence type would permit the business to continue to service their clientele in Mississauga for contract towing.

Currently, there are 440 licensed tow truck owners operating in Mississauga, of which 268 are located and licensed with a VPF within the city. In accordance with the by-law, these tow trucks are permitted to chase accidents. The remaining 172 licences have been issued to operators from outside the boundaries of Mississauga and of that 172, only 47 have agreements with licensed VPF in Mississauga. In other words, under the exiting by-law 125 operators are not authorized to chase accidents.

Staff have reviewed complaints about tow operators from outside the city associated with a VPF in Mississauga and have found that this is being done as a means to circumvent the by-law.

Further, the addition of the "Contract Towing Not For Hire" licence type would capture private tow trucks, which are not chasing accident scenes but are towing for small shops and private individuals for the purpose of moving vehicles from one location to another, and scrap vehicle businesses, which are operating on public roads. This has become a safety concern in recent years due to the lack of regulation. The tow trucks used for these unregulated tows are performed by vehicles which are underrated, often using a half-ton pickup truck with towing apparatus attached. The vehicles may not meet the requirements of the Ministry of Transportation, or city by-laws, for tow trucks and hence create a safety hazard due to underrated steering, braking and handling. The tow trucks and drivers often lack proper safety equipment, insurance and driver training.

The current by-law covers the requirements for "General Towing For Hire" and provides all the responsibilities for a tow truck driver to operate in Mississauga. It is recommended that for the "General Towing for Hire" license class the Tow Truck Licensing By-law 521-04, as amended, be revised to require a licensed tow truck operator/owner to be employed by a licensed brokerage in Mississauga with a licensed VPF within the Mississauga boundaries.

Furthermore, staff recommend that a new tow truck driver licence class for "Contract Towing Not For Hire" be created and that the fees for the new class be the same as for the "General Towing For Hire" class. This would further assist with enforcement of the by-laws for both Mobile Licensing Enforcement staff and police services as it would be clearly defined which licence type would be permitted to attend accident scenes, police seizures or highway break downs. This would assist in regulating the tow truck industry to ensure that all "General Towing For Hire" tow trucks are located within Mississauga and maintain a licensed VPF within Mississauga, as well.

With the recommended changes to the by-law, a licensed "Contract Towing Not For Hire" could only attend an accident scene in Mississauga when formally dispatched to the accident scene at the request of the hirer. Mobile Licensing Enforcement staff and police services would be regulating accident scenes for this requirement.

FINANCIAL IMPACT:

This recommendation may increase tow truck licensing revenues.

CONCLUSION:

Following consultation with representatives from the CAA and from the Mississauga towing industry, staff recommend that the Tow Truck Licensing By-law 521-04, as amended, be revised to include two licence types: "General Towing For Hire" and "Contract Towing Not For Hire", as outlined in this report.

The current by-law provides clear direction for the licensing of "General Towing For Hire" towing and requires amendments to allow for inclusion of a new licence class: "Contract Towing Not For Hire" with similar licensing fees. The "General Towing for Hire" class will require an amendment to include a requirement that the licence class must be located within the City boundaries and have affiliation to a licensed VPF. This amendment will assist in regulating the tow truck industry by ensuring that tow truck drivers chasing accidents in the

city have the appropriate licence to do so.

The amendment also provides an opportunity for those not within the city to maintain a licence as a contract tow operator. Furthermore, the amendment ensures that no vehicle will be towed outside the city boundaries without the direction of the hirer/owner.

Staff further recommend the implementation of the "Two Tier Licence" system to coincide with the current expiry date for tow truck owner's licences. The transition to the two tier licensing would be implemented effective July 1, 2015.

Martin Powell, P. Eng.

Commissioner of Transportation and Works

Prepared By: Daryl Bell, Manager, Mobile Licensing Enforcement

Corporate Services Department Legislative Services Division Office of the City Clerk

City of Mississauga 300 City Centre Drive MISSISSAUGA ON L5B 3C1



Leading today for tomorrow

Towing Industry Advisory Committee

DEC 0 1 2014

FAX: 905-615-4181 www.mississauga.ca

DATE;

November 17, 2014

TO:

Towing Industry Advisory Committee

RE:

2015 Towing Industry Advisory Committee Meeting Dates

This is to advise that the following meeting dates for the Towing Industry Advisory Committee (TIAC) have been scheduled for 2015:

Tuesday, February 17, 2015 Tuesday, April 7, 2015 Tuesday, June 2, 2015 Monday, September 14, 2015 Tuesday, November 3, 2015

Unless advised otherwise, all TIAC meetings will be held at 9:00 a.m. in the Council Chamber, 2nd Floor, Civic Centre, 300 City Centre Drive, Mississauga, Ontario, L5B 3C1.

If you foresee being absent from a TIAC meeting please contact the Legislative Coordinator so issues with quorum can be rectified.

Stephanie Smith

Legislative Coordinator Legislative Services Division, Office of the City Clerk Phone: 905-615-3200 Ext. 3795

E-Mail: stephanie.smith@mississauga

Towing Industry Advisory Committee Action List

Issue	Last Discussed on	Who	Status
Gross Vehicle Weight Rating (GVWR)	June 18, 2012	Enforcement Office	COMPLETED
Dual-Wheel Trucks	June 18, 2012	Enforcement Office	COMPLETED
Accident tow rate – amending flat rate	October 22, 2012	Enforcement Office	COMPLETED
Compliance and enforcement of Licensed Vehicle Impound Facilities (VPF)	October 22, 2012	Enforcement Office	COMPLETED
Bi-yearly Ontario Drivers Abstract and a Peel Regional Police criminal record search for all drivers	October 22, 2012	Enforcement Office	COMPLETED
Any company applying for a Tow Truck Owner's License must also show proof of an approved Vehicle Impound Facility which is located within the boundaries of the City of Mississauga	June 18, 2012	Enforcement Office	COMPLETED
Proof of insurance credentials	October 22, 2012	Enforcement Office	COMPLETED
Drivers complete the following – criminal record search every 6 months, drivers abstract every 6 months, and WSIB	October 22, 2012	Enforcement Office	COMPLETED
Towing Practices and Policies for the Peel Regional Police	June 18, 2012	Enforcement Office	COMPLETED
Capping the Number of Tow Truck Licenses	February 28, 2012	Enforcement Office	COMPLETED
Training/qualifications for drivers	May 6, 2014	Enforcement Office	To be brought back to a future meeting
Central City pound facility	February 19, 2013	Enforcement Office	Enforcement staff to report back
By-law review – Towing out of City boundaries	February 19, 2013	Enforcement Office	Enforcement staff to report back
By-law review – WSIB/Insurance requirements	February 19, 2013	Enforcement Office	Enforcement staff to report back
Auto clubs operating without owning a pound facility	April 15, 2014	Enforcement Office	In progress