



Pattison Outdoor Advertising
5700 Matheson Blvd East, Suite 500, West Tower
Mississauga, ON L4W 4V9

Re: Report No. 2021-66, Proposed Amendments to the City of Brantford Municipal Code, Chapter 478- Signs-Outdoor-Other Advertising Devices

Dear Ms. Binkley,

Pattison Outdoor is Canada's largest digital Out of Home (OOH) provider, and our digital displays can be found from coast to coast. We have been operating in Ontario for more than 50 years, and our expertise and experience has helped us obtain the necessary approvals for over 100 digital faces throughout Ontario.

Through our ongoing collaborative approach of working with various governing bodies, we believe our insight into the digital OOH landscape can be helpful to the City of Brantford as they consider amendments to the Brantford Sign By-law.

We have respectfully provided some comments below, and would be happy to discuss further with Staff involved in this review at their convenience to provide additional feedback on potential changes which will have a direct impact on the industry.

9.2.2 Minimum Dwell Time (MDT): Proposed 20-second Dwell time

The Brantford Sign By-law currently states that the minimum dwell time for electronic changeable copy is 3.0 seconds. Our experience operating digital networks across Canada suggests that this dwell time is not long enough, and should be amended with the other updates to the Sign By-law which are being considered.

Other cities in Ontario, such as Toronto, Bradford West-Gwillimbury, Windsor, Hamilton, Vaughan, Mississauga, Toronto, Pickering and Milton, have implemented dwell times ranging from 6 to 10 seconds, based on the applicable Sign By-law provisions.

We strongly urge you to consider recommending to Council a 10-second minimum dwell time requirement for Digital Signs, when amending the Brantford Sign By-law. This timing allows the intended audiences to view and understand the content being displayed, while providing enough opportunities to satisfy the growing demand for Brantford-based businesses to connect with their potential clients and attract new customers by showcasing their products and services.



Section 8.2 of the report advises that City Staff reviewed Sign By-laws from a number of different municipalities for appropriate digital signage requirements. Table 1 below shows the dwell times for several municipalities in the GTA, as well as the number of existing digital billboards Pattison operates in these markets.

We take great pride in creating opportunities for Canadian businesses which don't have optimal exposure to use our digital billboards to reach their intended audiences. A minimum dwell time of 20 seconds will not allow us to pursue new digital billboards in the Brantford, as it will not meet the demand for these opportunities.

Table 1: Dwell Times in other Ontario Municipalities

Municipality	Required Dwell Time	Existing Pattison Digital Signs
Toronto	10 Seconds	16
Mississauga	10 Seconds	6
London	10 Seconds	6
Kitchener	6 Seconds	2
Cambridge	10 Seconds	2
Hamilton	6 Seconds	4
Niagara Falls	6 Seconds	2
Pickering	6 Seconds	2
Guelph	20 Seconds	0
MTO Jurisdiction	20 Seconds	0



There has been extensive data collected and presented on the topic of digital billboards and driver distraction over the last decade, and the conclusion arrived at is that there is no direct evidence that these types of signs lead to additional safety concerns.

In regards to dwell time, a report by Dukic et al in 2012 states that the Swedish Road Authority advised that a 7.0-second message duration was established based on a trial-and-error method, and to represent a compromise between traffic safety demands and the requests of billboard owners.

Guidelines established by the U.S. Department of Transportation Federal Highway Administration (FHWA) in 2007 found that minimum dwell times range between 4 and 10 seconds, with a recommended duration of 8.0 seconds.

It is also recommended that the interval between messages be as short as possible, with instantaneous being the optimal transition speed. Any visual effects between one message and the next should be prohibited.

The City of Toronto has maintained a 10-second minimum dwell time for Digital Signs since 2010, when the current Sign By-law was enacted. In 2015, they initiated an *Electronic and Illuminated Sign Study* to determine appropriate locations for Digital Signs and whether the regulations in place were in keeping with other countries around the world, while representing a balance between keeping the roads and travelers safe and creating sufficient opportunities for the industry to build signs for businesses to use to connect with their customers.

As part of the *Electronic and Illuminated Sign Study*, the Transportation Services division completed a review of electronic signs and their impacts on traffic safety, comprised mainly of two elements. The first element was a literature review of studies that had been completed on the topic; the second element was a statistical analysis of locations in Toronto where electronic signs have been installed, in an effort to determine whether there has been an increase in traffic collisions.

Transportation Services conducted a statistical analysis of collisions before and after electronic signs were installed using the methodology outlined in the *American Association of State Highway Traffic Officials Highway Safety Manual*, which included more than six years of data.

A total of 1,727 collisions at 11 separate locations along the Gardiner Expressway and Highway 27 were analyzed for this review. The results indicated there was a four per cent decrease in the number of collisions after the electronic signs were installed, which is considered to be statistically insignificant. The main conclusion of this study by



Transportation Services was they were unable to identify any statistically significant effect on collisions where electronic signs had been installed.

Further, approvals have been granted for several large-format third party electronic ground signs with minimal setbacks from 400-series highways, which have been reviewed and approved by multiple municipalities, including Toronto. With sign faces in excess of 62 square metres located in direct view of, and in close proximity to the travelled portion of these highways, we believe this further demonstrates that the impacts of electronic signs on traffic have been deemed to be negligible. These signs operate with minimum dwell times of 8 or 10 seconds.



We respectfully ask that you revise the minimum dwell time for Digital Signs in Brantford to 10 seconds, to expand the opportunities for local and national businesses to utilize the advancements in technology which are revolutionizing the Out-of-Home industry. If we can provide any further information on the subject, we are happy to do so any time. Thank you for your consideration of this matter.

Nathan Jankowski
Manager, Permits & Legislation



Pattison Outdoor