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Halifax Regional Council
February 25, 2003

TO: Mayor Kelly and Members of Halifax Regional Council

SUBMITTED BY: *S. Dale MacLennan*
S. Dale MacLennan, Director, Financial Services

DATE: February 19, 2003

SUBJECT: False Alarm By-law B-400 Update

INFORMATION REPORT

ORIGIN

This is a staff-originated report to provide Council with an update of the impact of the Alarm Bylaw, B-400; and to provide an overview of the administrative process, in particular, the appeals process.

BACKGROUND

The False Alarm By-law B-400 and related Administrative Order # 15 which set out the license fees and fees for service was approved by Council on April 13, 1999. The fees set out in the administrative order included an escalating service fee for each subsequent alarm ranging from \$100 to \$150 in a 12-month consecutive period and that no fees are applied to the mandatory registration of an alarm system.

Staff provided Council with an Information Report as an update on the administrative process on March 21, 2000. Staff also responded to a request from Council regarding a number of administrative issues in an Information Report submitted to Council on May 2, 2000. Both are attached for your reference.

DISCUSSION

By-law B-400 has been in place for three and one half years. A review of its effectiveness is in keeping with sound management principles which measure the effectiveness and efficiency of programs delivered to the citizens of Halifax Regional Municipality. This report will identify the major issues encountered and provide a statistical snapshot of the program.

The By-law is composed of four distinct administrative components:

1. Alarm system registration.
2. Alarm notification - issuance and follow up.
3. Appeals process.
4. Compliance with alarm system registration.

1. Alarm System Registration

The bylaw requires that the property owner register each alarm system. During debate of the bylaw, Council identified public education as a critical component to the successful implementation of the bylaw. Staff responded by sending out 90,000 registration pamphlets with the final tax bills for 1999-2000 and again, with the interim billing for 2000-2001.

More recently citizens have been reminded of the requirement to register their alarm system on each tax bill and through their respective alarm and monitoring companies. All correspondence generated from the alarm process includes a reference to the requirement to register, accompanied with a registration form.

Due to the timing of the passing of the By-law with a labour disruption and the tremendous response from citizens, major delays occurred in processing submitted registration forms. The back log continued until approximately March 2000. Currently, all new or changed registrations are processed monthly and residents receive a unique alarm identification number and permit. The permit number attaches to the individual property and transfers from owner to owner for as long as the alarm system remains active. Police, Fire Services and the 911 Centre then update their registration records.

At the time By-law B-400 was enacted, the previous municipal units had estimated that there were approximately 10,000 registered properties. The following table reflects the changes in numbers of registrations. By October 2000, more than 5,000 new registrations had been processed and another 8,615 previously registered properties had been matched to the property assessment number.

Date	Total Operating Systems	Registration forms/updates received/processed	Properties not registered or matched	Total Known Systems Operating within HRM
Feb 1, 1999	10,000(est)			
Oct 31, 2000		8,615	5,385	14,000
June 13, 2002		13,067	6,073	19,140

The number of registered properties continues to increase, as does the number of noncompliant registered properties. The report will address this under item three.

2. Alarm Notifications - Issuance and Follow -up

Regional Police, Fire and the RCMP respond to alarm calls as an emergency response. At the point an alarm call is determined not to be an emergency, a false alarm notification is left at the property. Appendix A provides a summary by agency of the number of alarm incidents for which an alarm notification has been left with the property owner. The table also identifies the number of alarm notifications that were incomplete and not able to be processed.

Over the past three years, the number of notifications which could not be processed has continued to drop to its current level of less than 1% of the total number issued.

The details provided in Appendix A indicate an average decrease in false alarm responses for all service providers of 11 % from the pre-enactment date. This reduction does not include any impact for increases in total alarm systems in operation and therefore understates the success of the program overall. The largest reduction occurred in the first year of enactment of the bylaw. The table also provides detail on the number of notifications issued in comparison to the total number of responses. The criterion under which an alarm notification is left at the property differs with each responding agency. Regional Police Services issues an alarm notification for all instances of false alarm responses, while Fire Services issues a notification 63% of the time and the Royal Canadian Mounted Police issue alarm notifications 36% of the time. Fire has indicated that the reason for this is because Fire personnel do an onsite judgement call of the validity of the false alarm and in instances where they deem the criteria for forgiveness under the by law are met do not issue the notification. The RCMP has explained that they will also evaluate a false alarm at initial call to see if it qualifies for

forgiveness under the by law. Approximately, 10 % of their calls are dealt with this way. About 30% of the false alarms are to schools and financial institutions and volunteer locations and to HRM facilities. The RCMP do not issue notifications to these. And the remaining 24% of calls are called off as the officer begins to respond and where the location of the false alarm is so far afield ie several kilometers from the starting location, the RCMP do not travel to the location simply to issue a notification.

3. Appeals Process

After an alarm notification has been left with the property, the information is passed on to the Financial Services Department for processing. Regardless of whether the alarm notification is the first response in a 12-month period or the fifth, the property owner is advised that there was an alarm response and billed for any applicable service charges. An appeal form is included with the correspondence. The form provides detail on the criteria and documentation that should be included with the appeal in order for the Alarm Coordinator to determine if the circumstances of the alarm call falls within the definition of an appealable cause, as provided for within the bylaw.

The provisions of the bylaw provide for an appeal through the Alarm Coordinator whose decision is final and binding. Decisions are reached after an examination of the documentation provided with the explanation of the circumstances which the property owner feels led to the activation. As much as possible, this information is verified from independent sources. For example, all claims of disruption of electrical power are confirmed with Nova Scotia Power and claims that weather conditions contributed to the alarm activation are confirmed with Environment Canada. Contact is also made with various members of the alarm industry to verify the legitimacy of equipment related claims.

Appeals are often denied based on incomplete or inconsistent information which does not demonstrate, on a balance of probabilities, that the stated factors directly caused the alarm activation. The general principle established under the bylaw is that the property owner is expected to take all reasonable and necessary action to avoid a false alarm call. Anything outside of the property owner's control supports a successful appeal. These include acts of vandalism, criminal intentions and incapacity of individuals.

The first appeal criteria is that the property owner must "demonstrate" that the alarm activation was not caused by the actions of themselves or anyone to whom permission has been given to enter the premises; the person who installed, connected, operated, maintained or serviced the alarm system; or the manufacturer of the alarm system. If any of the foregoing persons activated the alarm, then the appeal must be denied.

Under the second appeal criteria, the property owner must be able to demonstrate that the alarm was caused by a storm, lightning, earthquake or other violent act of nature. Given the propensity of our climate to be naturally windy and wet, alarm systems should be installed, maintained and operated to meet these conditions. Very unusual weather circumstances can result in numerous false alarm calls and is one measurement used by the Alarm Coordinator to determine the validity of the appeal. However, failure of the property owner to carry out proper maintenance and repair to the alarm system or structure would not necessarily excuse an alarm call if action could have been taken to avoid the alarm call, regardless of the weather.

In circumstances where a loss of power is claimed as the cause of the alarm activation, the Alarm Coordinator confirms whether or not there was sufficient battery backup in operating condition. A general rule of thumb, which has been confirmed by the alarm industry, is that a back up battery should last no less than three hours and up to five hours before the alarm system would fail resulting in an alarm call. An appeal based on a power failure of greater than three to five hours is generally granted.

The third appeal criterion relates to a mechanical or electrical failure of a component or the system. Generally, incidents where a component fails to operate within the expected normal operating period (ie. warranty period) will result in an appeal being granted. However, there are certain components that fail to operate properly because appropriate maintenance and/or housekeeping has not been carried out. In this case, an appeal will not be granted.

There are a number of minor administrative issues that could be addressed through policy that would provide greater clarity for the Alarm Coordinator and for those residents who have received a false alarm notification. For example, the bylaw does not impose a time limit on when an appeal should be accepted nor does it limit the number of times an individual can appeal a false alarm. The Alarm Coordinator currently accepts any appeal regardless of the age of the incident and continues to review and re-review an appeal if new relevant information is provided. Currently, appeals that are over 9 months old and are pending as a result of waiting for the alarm owner to provide additional information are closed but can be reopened. If the appeal occurs after an invoice has been sent to the property owner, and is unsuccessful, any interest that has accrued during the appeal period is usually rescinded if the delay rests with the HRM and payment is received within 30 days of the notification of the appeal decision.

The bylaw also does not set a time limit on HRM's response time to any appeal filed. Staff are currently assessing administrative process and policy and will include the turnaround time in the assessment.

Property owners whose appeals have been denied have identified a number of issues that they believe are unfair. These are:

- One free false alarm call in a 12 month period is not enough.
- Property owners should not be held responsible for the actions of other people, especially the alarm or monitoring company.
- Alarm company can't/won't provide documentation that a part was defective.
- My tenant should be responsible, not me.
- My landlord (property owner) does not need to know. Why are you sending the bills to him/her?
- My alarm system is not monitored by a third party. Why should I have to register it?
- If I'm not happy with the results of my appeal, I should be able to take it somewhere else.
- The Alarm Coordinator is too inflexible. My circumstances are unique and this should be a consideration when reviewing an appeal.

Staff are considering a number of options to address concerns which have been raised and to improve efficiency for taxpayers and for HRM. Those options will be explored and staff will return to Council with specific recommendations in the spring.

Appendix B provides details on the number of appeals received and granted over the past three years. In total, 42% of all appeals received are granted.

Staffing changes have resulted in the Treasurer appointing a new Alarm Coordinator to administer By-law B-400. Effective, February 1, 2003 all inquiries regarding the administration of By-law B400 and appeals should be referred to David Cormier, Team Leader of General Revenue and Payment Processing. (490-4201)

4. Compliance with Alarm System Registration

When a property owner has registered their alarm system, the responding agency has quick access to pertinent information about the nature of the alarm, for example, is it a fire, intrusion, smoke or panic alarm type? The greatest benefit is for the alarm owner who does not have their alarm system monitored by a company. In these cases, the Police/Fire and 911 services will have contact name information available so they can follow up with a homeowner or designated alternate if a problem exists where false alarms are occurring repeatedly and the owner is out of town or for some other reason unavailable. The more information available to the responding agency the better. When a

false alarm occurs to a non-registered property, the owner is notified in writing of their obligation under the by law to register their system.

Perhaps the biggest surprise to staff has been the resistance of property owners to voluntarily register alarm systems, even after they have received multiple alarm calls. The following table shows the number of false alarms that have occurred to non-registered properties. At this time, staff are considering the legal options available to bring these property owners into compliance. Direct action can be taken against property owners by formally charging them with failing to comply with the bylaw. This action would provide an opportunity for the property owner to register and remit a voluntary payment of \$100 in order to avoid court action.

Currently, there are 6,073 alarm systems within the Halifax Regional Municipality that are known to be non-registered but operating within the HRM. These systems have amassed a total of 15,652 notifications. The breakdown of number of occurrences to each alarm system follows. Each of these alarm owners have been notified directly on at least two occasions of the requirement to register their operating alarm system. The first, when the notification is issued by the police or fire officer and the second, when a formal letter was sent, as required under the bylaw, by Financial Services.

Total False Alarms to Non-registered Properties	1st event	2nd event	3rd event	4 or more events
15,652	7,518	3,002	1,594	3,538

All registration information can or is made available to the Halifax Regional Police Services and Fire Services. Should a problem arise at the property, they can make contact with the registered owner or their designated contact to try and resolve the matter. The information is kept strictly confidential and used only by the responding agency.

BUDGET IMPLICATIONS

There are no current year budget implications.

FINANCIAL MANAGEMENT POLICIES/BUSINESS PLAN

This report complies with the Municipality's Multi-Year Financial Strategy, the approved Operating, Capital and Reserve budgets, policies and procedures regarding withdrawals from the utilization of Capital and Operating reserves, as well as any relevant legislation

ALTERNATIVES

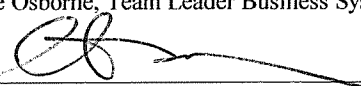
NA

ATTACHMENTS

1. Information Report False Alarm By-law B-400 Administrative Update-March 21, 2000
2. Information Report False Alarm By-law B-400 Administrative Issues & Grace Period for Seniors- May 2, 2000
3. Appendix A - False Alarm Statistics - Experience April 1, 1999 to December 30, 2002
4. Appendix B - Schedule of Appeals - April 1, 1999 to December 30, 2002

Additional copies of this report, and information on its status, can be obtained by contacting the Office of the Municipal Clerk at 490-4210, or Fax 490-4208.

Report Prepared by: Cathie Osborne, Team Leader Business Systems and Control 490-4093

Report Approved by: 
Catherine Sanderson, Manager, Revenue 490-6470

Halifax Regional Council
March 21, 2000

TO: Mayor Fitzgerald and Members of Halifax Regional Council

SUBMITTED BY: *S. Dale MacLennan*
S. Dale MacLennan, C.A., Director of Financial Services

Cathie Osborne
Cathie Osborne, Team Leader, General Revenue

DATE: March 8, 2000

SUBJECT: False Alarm By-law B-400 Administrative Update

INFORMATION REPORT

ORIGIN

This is a staff originated report.

BACKGROUND

By-law B 400 was enacted by Council on April 13, 1999 during the 1999-2000 budget deliberations. The intent of the by-law is to encourage property and alarm owners to take the action necessary to avoid triggering false alarm response calls by police and fire agencies. The new by-law replaced former Town of Bedford By-law 22103 and City of Halifax Ordinance No. 185.

The by-law is composed of four distinct administrative components:

1. Alarm System Registration
2. Alarm Notification Issuance and Follow-up
3. Appeal/ Adjudication Process
4. Enforcement of Alarm System Registration

Resources for staffing and administrative procedures were set aside in the 1999-2000 budget to facilitate the administrative roll-out through out the Halifax Regional Municipality. Concurrent with the enactment of the by-law was the implementation of a new financial system (SAP) and business process changes as a result.

DISCUSSION

Staff and Council had initially identified public education as a critical component to the successful implementation of this new by-law. Due to the timing of the passing of the by-law, staff were not able to complete a mass mailing until August 1999 at which time 90,000 registration form pamphlets were sent out with the final tax billing. Prior to this, 40,000 registration pamphlets were being sent out with the quarterly water bills, made available at all storefronts and handed out when responding to false alarm calls. In addition, contact with many alarm and security companies was made and registration forms sent out for inclusion with sales material and for general information purposes.

1. The actual hiring of an Alarm Assistant was delayed until mid-December 1999. The lack of dedicated resources has resulted in a tremendous back log of up to 10 months. The administrative process within the by-law makes it necessary for staff to confirm the assessment account number for each civic address, generate a first response letter and then follow up with invoices and registration permits. Since December, staff have been compiling a comprehensive database that will expedite the administration of the by-law in the future.
2. Prior to the enactment of the by-law there were 10,000 alarm systems registered in the former City of Halifax and Town of Bedford. Each of these alarm systems must now be matched with the correct assessment account numbers and registration permits sent out. To date, over 5,000 new registrations have been processed and mailed.. Over 3,000 first response letters have been sent out, 300 appeal requests processed and staff are currently working on creating and sending out 2,500 invoices totalling approximately \$287,000 covering the period of May 1999 to December 1999.

Staff regret the inconvenience to alarm system and property owners that may arise from the untimely mailing of invoices. In acknowledgement, staff are extending the interest free period up to 60 days from the usual 30 days. Ads will be placed in the local papers the week of March 24th to 31st advising the public that invoices relating to false alarm responses will be mailed out very shortly.

Because of the aforementioned delays in the implementation of all components of the by-law, staff have not been in a position to fully enforce the registration component of the by-law. However, we will be including an additional 90,000 registration pamphlets in the interim tax billing which is scheduled to go out before the end of March. This will complete the communication component of the by-law.

3. The by-law provides for an appeal/adjudication process by making a written request to the Alarm Coordinator with a description of the circumstances relating to the alarm call. Representatives from Police, Fire, Legal and Financial Services identified the critical framework into which various situations would have to fit in order to have a successful appeal.

The intent of the by-law is to encourage alarm and property owners take whatever action is available in order to avoid a false alarm call. As such, the by-law assigns this responsibility not only to the owner of the alarm and/or property, but to the company who installs, maintains, repairs and manufactures the alarm system. Any activity that is not in the direct control of the alarm owner would be excusable. This includes violent acts of nature, isolated mechanical or electrical failures and activities carried out by persons not in the direct or in direct control of the alarm owner. An example that meets this definition might be a fire alarm situated in a public place like a mall where the alarm is falsely activated by an unknown person. Appeals are being processed based on the evidence presented by the alarm and/or property owner to the Alarm Coordinator

4. There will continue to be an on-going need to educate new alarm system owners of the intent of the by-law and the need to register. Staff are strongly committed to this process. However, after April 1, 2000 the mandatory registration component of the by-law will be enforced in its entirety with non-compliance resulting in a penalty fee of \$100. Alarm system owners will be given a 30 day period in which to comply prior to any legal action being taken.

BUDGET IMPLICATIONS

There are no budget implications.

MULTI-YEAR FINANCIAL IMPLICATIONS

There are no multi-year financial implications involved in this report.

ATTACHMENTS

Copy of advertisement to go out week of March 24th to 31st.

Additional copies of this report, and information on its status, can be obtained by contacting the Office of the Municipal Clerk at 490-4210, or Fax 490-4208.

Report Prepared by: Cathie Osborne, Team Leader, General Revenue 490-4201



False Alarm Update.....

Graphics here.

During the week of March 20th the Halifax Regional Municipality will be sending out false alarm invoices to property/alarm owners who have received two or more false alarm responses since April 13, 1999.

Where is my invoice?

These invoices are late in being issued so we have extended the no-interest period to 60 days from the date of the invoice.

Where is my registration permit?

To date, we have issued over 5,000 registration permits to date and appreciate the patience of those who have sent in the completed registration form but not yet received the permit. Your permit will be mailed to you shortly.

For more information please contact:

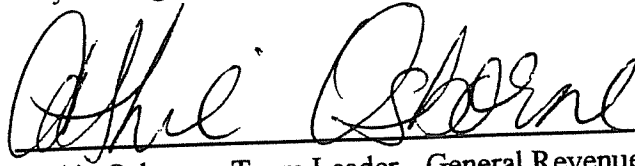
By phone 490-4141 or toll free in Nova Scotia at 1-800-835-6428.

By mail to the False Alarm Coordinator at PO Box 1749, Halifax, NS, B3J 3A5

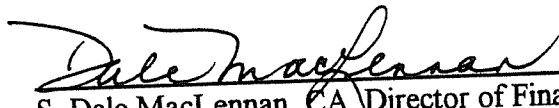
Halifax Regional Council
May 2, 2000

TO: Mayor Fitzgerald and Members of Halifax Regional Council

SUBMITTED BY:



Cathie Osborne, Team Leader - General Revenue



S. Dale MacLennan, CA, Director of Financial Services

DATE:

April 18, 2000

SUBJECT:

False Alarm By-law B-400 Administrative Issues & Grace Period for Seniors

INFORMATION REPORT

ORIGIN

During the April 11, 2000 Halifax Regional Council Meeting, Councillor Kelly requested that staff prepare a report that would address the issue of implementing a phase-in period for seniors to become familiar with their new alarm systems and not be charged for any errors that may occur during this phase-in period.

Councillor Walker requested that the report include information on whether or not all former City of Halifax registered alarm systems have been automatically registered with HRM.

Councillor Scholfield requested that staff include clarification as to whether or not alarm systems registered with the supplier have to also be registered with the Municipality. Staff were further requested to comment on the issue of alarm testing and By-law B400.

BACKGROUND

Since the enactment of By-law B 400, staff have been working with numerous security alarm companies, institutions and private home owners to ensure understanding and compliance to the four (4) components of the by-law.

1. The registration component is on-going with individual alarm owners receiving a registration permit and number which is matched to the civic address and assessment account number
2. Notification forms are left each time an emergency response call results in a non-emergency situation.
3. Administrative functions include appeal requests which are processed based on the criteria set out in the by-law.
4. Non-compliance with the registration component is followed up by advising the alarm owner of the requirement to register and providing up to 30 days notice in which to comply, prior to any action occurring which would result in a charge of \$100.00.

There has been two (2) inserts in the tax billing of August, 1999 and the Interim bill of 2000 as well as advertisements in the newspaper.

DISCUSSION

On-going discussions take place, on a daily basis, with individual security alarm companies regarding the registration of alarms and appeal requests. On April 20, 2000 HRM staff attended a breakfast meeting with members of CANASA, the Canadian Alarm and Security Association, Atlantic Chapter. Discussions included the status of the implementation of the by-law and general information on alarm systems and appeal criteria.

A direct result of the appeal process is that staff are in frequent contact with various alarm system providers for the purposes of investigating and clarifying statements made pertaining to a particular call and/or situation. Staff are able to maintain consistency in appeal decisions and remain up-to-date on new technology or problems in the industry because of this on-going dialogue.

In our discussions with alarm companies we have concluded that the majority of companies provide new alarm owners or newly monitored properties with a phase-in period of operation before going live with the alarm system. The phase-in period varies from 48 hours to up to two-weeks, depending on the comfort level of the home owner. Staying cognizant of the needs of their customers appears to be a high priority for the alarm companies. By providing for a one free call per year within the by-law, Council has provided an additional phase-in opportunity for all property owners, regardless of demographics. Staff believe that the current market driven phase-in period and by-law provisions meets the majority of alarm owner's needs.

The current by-law does not allow staff to single out one group of residents from another. In the specific case of senior citizens staff would endeavor to establish ongoing working relationships

between the senior associations, groups and alarm companies so that our senior residents can be made fully aware of the informational opportunities available to them through all HRM agencies and alarm companies.

Former City of Halifax registered alarm system owners have maintained their previous permit numbers. Staff are working towards matching the 10,000 civic addresses to assessment accounts.

Confirming alarm registration permits will be forwarded to the property owner as this process is completed. Staff have completed 7,000 new registrations over the last year and are receiving approximately 800 new alarm registrations each month.

The onus to register ones' alarm system rests with the alarm/property owner. If an alarm owner identifies an alarm company as their monitoring agent, staff will accept both registration forms and appeal requests sent on behalf of the alarm/property owner. Many alarm companies now include the registration component as part of their regular sales and maintenance protocol. During 1999 most alarm companies undertook to capture and forward registration information for all of their HRM customers. Other companies have advised their customer base of the by-law requirements. CANASA has designed a number of pamphlets for use by their membership which identifies the by-law requirements and promotes the intent of the by-law. This education information is available to both potential and current customers and has been offered for reproduction and use of the HRM.

BUDGET IMPLICATIONS

There are no budget implications.

Additional copies of this report, and information on its status, can be obtained by contacting the Office of the Municipal Clerk at 490-4210, or Fax 490-4208.
Report Prepared by: Cathie Osborne, Team Leader - General Revenue 490-4201

Appendix A False Alarm Statistics - Experience

	99/00	00/01	01/02	Projected 02/03	Avg Annual Calls Post By-Law	Yr 0 Pre-by-law Calls
Regional Police						
Total False Alarm Responses	6439	7662	7550	7400	7263	8231
Total Notifications Issued:	6439	7662	7550	7400	7263	
Incomplete	142	0	28	0	43	
Actual Processed	6297	7662	8391	7400	7438	
% Issued of Total Responses	100%	100%	100%	100%	100%	
	*adj/est					
Regional Fire Services						
Total False Alarm Responses	2462	2662	2502	2462	2522	3425
Total Notifications Issued:	1351	1595	1392	1976	1579	
Incomplete	214	0	12	0	57	
Actual Processed	867	1591	981	1976	1354	
% Issued of Total Responses	55%	60%	56%	80%	63%	
	*adj/est					
RCMP						
Total False Alarm Responses	2957	4000	3992	5507	4114	4146
Total Notifications Issued:	1035	1772	1401	1765	1493	
Incomplete	249	0	13	0	66	
Actual Processed	786	1772	1410	1765	1433	
% Issued of Total Responses	35%	44%	35%	32%	36%	
Summary Detail						
Total False Alarms	11858	14324	14044	15369	13899	15802
Total Notifications Issued	7950	11025	10782	11141	10225	
Notifications Not Issued	3908	3299	3262	4228	3674	
% Issued of Total Responses	67%	77%	77%	72%	74%	
Actual decrease in False Alarms						
Yr 3 Actual	14044					
Yr 0 Actuals	15802					
Difference	1758					
% reduction	11%					

Appendix B

Schedule of Appeals

	Apr 1/99 - Mar 31/00	Apr 1/00 - Mar 31/01	Apr 1/01 - Mar 31/02	Totals
Regional Police				
Total 1st letters/invoices	6297	7662	8391	22350
Total Appeal Requests	627	700	760	2087
Total Appeals Granted	258	289	219	766
% Granted of Appeals Received	41%	41%	29%	37%
% Granted Appeals to Total letters/invoices	4%	4%	3%	3%
Regional Fire Services				
Total 1st letters/invoices	867	1591	993	3451
Total Appeal Requests	87	140	88	315
Total Appeals Granted	79	86	46	211
% Granted of Appeals Received	91%	61%	52%	68%
% Granted Appeals to Total letters/invoices	9%	5%	5%	6%
RCMP				
Total 1st letters/invoices	1035	1772	1410	4217
Total Appeal Requests	104	177	140	421
Total Appeals Granted	62	96	58	216
% Granted of Appeals Received	60%	54%	41%	52%
% Granted Appeals to Total letters/invoices	6%	5%	4%	5%
			Percent of Appeals Granted to Requested	42%
			Percent of Appeals Granted to Bills Issued	4%