

Geoff Wilkinson, CAE
Executive Director
Ontario Traffic Council
3100 Garden Street, PO Box 800300
RPO Rossland Garden, Whitby, Ontario L1R 0H1

RECEIVED
September 4, 2020
REGION OF PEEL
OFFICE OF THE REGIONAL CLERK

September 4, 2020

Dear Mr. Wilkinson,

I am writing to acknowledge a communication I received on August 21, 2020 concerning the Regional Municipality of Peel and the Peel District School Board's current efforts to explore a program to use automated school bus cameras to promote the safety of students and their families in the Region of Peel. I want to start by recognizing our ongoing partnership and the work of the Ontario Traffic Council to improve traffic management and safety.

I want to provide you with some context on the work being undertaken by Regional staff in close collaboration with our stakeholders (Regional Council, municipal staff, Student Transportation of Peel Region, Peel school boards, Peel Regional Police, and the Ontario Provincial Police) to explore a program that would complement traditional Police enforcement to help make the roads safer for more than 68,000 students that travel across the Region of Peel every day.

Peel Regional Council unanimously passed Resolution 2020-446 on June 11, 2020. This resolution directed Regional staff to:

- report back to Council with options, scope, and costs for implementing a stop arm camera program in the Region of Peel.
- support the Student Transportation of Peel Region's (STOPR) procurement process for a suite of modern school bus technologies, with the option to leverage that procurement for the acquisition of compatible stop arm camera hardware and software.

Staff are collecting the necessary information to allow Peel Regional Council to make an informed decision about how a stop arm camera program could best support the needs and interests of the Region of Peel. Specifically, staff are currently investigating issues of processing and court capacity, constraints within the current legislative framework, funding considerations, and hardware/software technology requirements with plans to report back to Council consistent with Resolution 2020-446.

REFERRAL TO _____
RECOMMENDED _____
DIRECTION REQUIRED _____
RECEIPT RECOMMENDED _____

Nando Iannicca
Regional Chair & CEO

10 Peel Centre Dr.
Suite A, 5th Floor
Brampton, ON L6T 4B9
905-791-7800 ext. 4310

As part of the Region's due diligence, staff are currently investigating these matters in coordination with our stakeholders listed above, including representatives from our local Municipal Courts. This thorough and methodical process will ensure that any resulting program adheres to all applicable Legislation, Regulation, and MTO Guidelines and provides for an efficiently run program that serves the needs of our constituents.

Regional staff look forward to continuing to work with all our partners to support the development of best practices for stop arm camera solutions with the goal of providing Peel Regional Council with the information necessary to make an informed decision on developing a stop arm camera program compatible with STOPR's selected technology.

The Region of Peel would be happy to sit down with our school board partners, STOPR, and the OTC to further discuss this exciting work.

Kindest personal regards,



Nando Iannicca
Regional Chair & Chief Executive Officer
Region of Peel

Cc. Colleen Russell-Rawlins, Interim Director of Education, Peel District School Board
Councillor Johanna Downey, Town of Caledon, Ward 2
Terry Ricketts, Director of Transportation, Region of Peel
Wendy Dobson, General Manager, Student Transportation of Peel Region
(STOPR)



Ontario Traffic Council

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Executive Director

Geoff Wilkinson
Ontario Traffic Council

Colleen Russell-Rawlins
Interim Director of Education
Peel District School Board
5650 Hurontario St.
Mississauga ON L5R 1C6

August 21, 2020

Dear Ms. Russell-Rawlins

The Ontario Traffic Council (OTC) has recently been advised of a Peel district School Board notice to sole source an automated school bus camera system "PDSB PACAN #M20-4513".

In June of this year, the Ontario Traffic Council formed a School Bus Camera Working Group consisting of a select number of municipalities across Ontario interested in installing automated school bus cameras for the purpose of capturing and processing offenses whereby motorists unlawfully pass school buses. There are a number of challenges using automated cameras in Ontario and the OTC Working Group, drawing from our experience with the red-light camera and automated speed enforcement programs, will be discussing these to ensure we have a program(s) in place, which amongst other solutions, provides sufficient evidence to prosecute offenses.

Unfortunately, some Ontario School Boards and school bus consortiums have purchased, or are looking to purchase, camera systems that may not meet Ontario Legislation or Regulations for capturing and processing offenses. These parties will likely turn to their municipal transportation services departments to administer the back end of an automated camera system. This could prove problematic when the back end solutions have not yet been mapped out with appropriate processes in place that meet Legislation, Regulation and the MTO Guideline.

While the OTC applauds the Regional Municipality of Peel and the Peel District School Board for making school bus cameras a priority, we would like to caution you to ensure camera systems meet Legislation, Regulation and the MTO Guideline prior to purchasing hardware and systems. It appears within your Criteria for Assessment of the Statement of Capabilities within your PDSB PCAN notice, you are requiring a contractor take on responsibilities that do not adhere to Legislation, Regulation and the MTO Guideline including generating evidence packages, court support, processing violations offenses, etc.

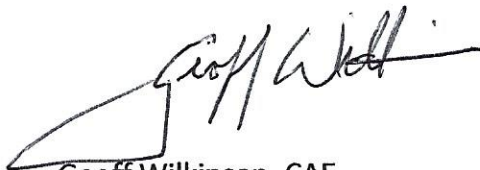
In addition to the issues outlined above, you may also have challenges with your court system in Peel Region in processing school bus passing offenses. These offenses, prosecuted after September 1st, will fall under the Provincial Offenses Act (POA) system with MTO plans to convert to an Administrative Monetary Penalty System (AMPS) at a yet to be determined date. You may want to understand what this means to your already overburdened court system and what processes will need to change under a future AMPS regime.

Peel Region is a member of the OTC School Bus Camera Working Group and by association, the Peel District School Board is invited to participate alongside Peel Region municipal transportation engineering staff at our meetings.

On Wednesday August 26, 2020, the OTC Working Group has arranged for five presentations from school bus camera system vendors. These presentations will help the Working Group better understand each company's capabilities and limitations for capturing offenses whereby motorists illegally pass school buses, especially pertaining to privacy, data storage, image quality, Legislation, Regulation and the MTO Guideline.

Once again, I would like to welcome you or your staff to participate on the OTC School Bus Camera Working Group. I would be happy to share meeting invitation details with you. If you have any questions, please do not hesitate to contact me.

Yours truly,

A handwritten signature in black ink, appearing to read "Geoff Wilkinson". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Geoff Wilkinson, CAE
Executive Director

c.c. Nando Iannicca, Chair, Regional Municipality of Peel
Gary Kocialek, Director, Public Works Transportation Division,
Region of Peel