

British Columbia Ferry Commission



Annual Report for the period **August 11, 2003 to March 31 2004**

*Prepared and submitted in accordance with
Section 53 of the Coastal Ferry Act
of the Province of British Columbia*

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July 28, 2004



To the Lieutenant Governor in Council

Comox, B.C.
July 28, 2004

May It Please Your Honour:

**British Columbia Ferry Commission Annual Report
August 11, 2003 through March 31 2004**

I am pleased to submit to you the first Annual Report of the BC Ferries Commissioner.

As required by section 53 of the Coastal Ferry Act, the Report sets out briefly all applications and requests for decisions to the commissioner under the Act, all orders issued by the Commissioner, the financial statements applicable to the office of the commissioner for the above period along with full disclosure of the expenses of, and associated with, the office of the commissioner.

Yours truly,

A handwritten signature in black ink, appearing to read "M. Crilly".

Martin Crilly
BC Ferries Commissioner

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1 Highlights: Message from the Commissioner

Policy Principles for the BC Ferry Commission

Coastal Ferry Act, s 38

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- (a) priority is to be placed on the financial sustainability of the ferry operators;
- (b) ferry operators are to be encouraged to adopt a commercial approach to ferry service delivery;
- (c) ferry operators are to be encouraged to seek additional or alternative service providers on designated ferry routes through fair and open competitive processes;
- (d) ferry operators are to be encouraged to minimize expenses without adversely affecting their safe compliance with core ferry services;
- (e) cross subsidization from major routes to other designated ferry routes is (i) to be eliminated within the first performance term of the first Coastal Ferry Services Contract to be entered into under this Act, and (ii) before its elimination, to be minimized;
- (f) the designated ferry routes are to move towards a greater reliance on a user pay system so as to reduce, over time, the service fee contributions by the government.

My appointment under the Coastal Ferry Act became effective August 11, 2003 for a seven-year term ending June 30, 2010. I am pleased to report a successful launch for the Office of the British Columbia Ferries Commissioner. This report covers the start-up period to March 31, 2004.

In April, 2003 British Columbia Ferry Services Inc (BC Ferries) became an independently owned, self-financing company, free to operate as a commercial enterprise. At this time it faces very little competition. My role as economic regulator is to guard against potential, undesirable outcomes of its monopoly position—notably, a combination of higher than necessary fares for lower than optimal service.

In carrying out this task, I am obliged to bear in mind the financial sustainability of BC Ferries and five other principles (see box, left).

A secondary task is to monitor BC Ferries' compliance with its fee-for-service contract. This is the Coastal Ferry Services Contract with the Province. In fiscal 2003/4 BC Ferries received \$105.8 million in provincial taxpayer funds under this contract to enable the company to charge below-cost fares and support other social policy initiatives of the government.

Two particular achievements of my office in this start-up year are: overcoming the technical challenges to implement price cap regulation under the Coastal Ferry Act; and public outreach.

The Commission made the following key technical determinations:

- **what performance data BC Ferries should report** quarterly, and what the Commission should do with that data; and, in particular,
- **how weighted average fares and price caps should be measured** and reported for each of the seven groups into which the 25 regulated routes fall—including what would happen should a finding of overpricing trigger enforcement by the Commissioner;
- **whether the weighted average fare was within the price cap** for all seven groups of routes in every quarter—in fact it was; and
- **whether BC Ferries made the contracted numbers of sailings** on each route. In fact in 2003/4, in delivering 83,294 round trips, BC Ferries met 99.97% of its contractual commitment for sailings.

Public Outreach

In public outreach, I made a particular effort in this start-up period to give the public open access to my office, and to initiate communication with the public and stakeholders. The prime goal was **to illuminate the role and responsibilities of the Commissioner within the new framework** for coastal ferry services. Accordingly, I:

- appeared on a province-wide phone-in radio talk show, and a panel presentation broadcast on local cable television;
- responded personally by letter or telephone to some 60 members of the public, requiring some 180 pieces of correspondence. The Commission's web site saw over 1600 unique visitors;
- met key provincial and federal officials who oversee other aspects (e.g. safety and subsidy) of BC Ferries' operations; and
- visited other key stakeholders including the ferry worker's union and competitors, emerging and potential, to BC Ferries.

How Well is the New Act Functioning?

It is still too early to assess how well the new Coastal Ferry Act is functioning and whether it is meeting its objectives. I do, however, draw the government's attention to one troubling area—the reservation system on the major Vancouver Island-Mainland routes and on the Sunshine Coast, for which customers pay a separate fee. The Act currently prohibits the Commissioner from regulating reservations, which it defines as “ancillary” services. Nevertheless, in my view, there is risk that the company will unduly exploit its monopoly position in the supply and price of reserved and unreserved spaces on these often-congested routes, especially if there is significant growth in traffic in the next few years.

Constructive Relationship with BC Ferries

While intending light handed, non-invasive regulation, the Coastal Ferry Act provides ample and decisive discretionary powers of policing and enforcement. I am pleased to report that these powers have so far been unnecessary. In my view the Commission and BC Ferries have established an effective working relationship with the appropriate blend of distance that is vital for the independence of my office on the one hand, and collaboration—and mutual trust—required for smooth and efficient regulation on the other. The company deserves credit for its commitment and its constructive posture to making the new legal framework perform.

In closing, I have found this inaugural period satisfying and I look forward to my second year of service.



Martin L. Crilly
British Columbia Ferries Commissioner
July 2004

2 Activity Summary

Commission Activities in the fiscal year 2003/4

1. **Regulation of Ferry Fares**
 - determined how to calculate weighted average fares and price caps, and confirmed that actual fares are below the caps.
2. **Regulation of Service Levels**
 - confirmed that BC Ferries delivered its contracted round-trips
3. **Special Decisions**
 - (no activity)
4. **Enforcement**
 - monitored BC Ferries public reporting. No enforcement actions required.
5. **Publication and Outreach**
 - maintained Commission records, published decisions on a web site, and communicated with the public and stakeholders.
6. **Administration and Reporting**
 - operated an office, obtained support services and consulting advice, and wrote its Service Plan and 2004/5 Budget

The Commission's activities fall into **six headings** shown on the left. These headings are the same as those used on the Commission's Service Plan and Budget published in September 2003.

The core, ongoing activities are in headings 1 and 2: the **regulation of fares** through the price cap mechanism, and the **regulation of service levels**.

Some types of regulation (e.g. under heading 3, **special decisions**, handling applications for route discontinuance) show no activity in the reporting period. The Commission found BC Ferries to be in compliance with the law and so no **enforcement** action (under heading 4) was necessary.

Two busy areas were to inform the public about the new Commission's role (under heading 5 - **publication and outreach**) and establishing new routines and procedures under **administration and reporting** under heading 6.

Readers will find **more detail** in the table on the following pages. It lays out the Commission's **planned versus actual activities** under the same headings, keyed to the relevant section number of the Coastal Ferry Act.

Activity number	Coastal Ferry Act Section	PLANNED ACTIVITY from the 2003/4 Service Plan (issued September 2003)	ACTUAL ACTIVITY in the Reporting Period (August 2003 through March 2004)
1.0 Regulation of Ferry Fares			
1.1	39	Determine how weighted average price is calculated	
		The Commission will provide guidelines for BC Ferries to build an Average Price Model which computes the average price within each of seven route groups. The model will draw upon BC Ferries traffic and sales data plus a set of explicit assumptions to calculate the average price at April 1, 2003, defined as the price cap for the first performance term. Operation of the model will be externally validated.	The Commission engaged InterVISTAS Consulting as external consultants with expertise in price cap regulation. After exploring various possible approaches with BC Ferries in a series of seminars with company management, the Commission directed BC Ferries on the methodology for building an Average Price Model and determining the initial price cap. At th end of the reporting period, the Commission was drafting a formal Determination for publication as a prescription and manual for future reference.
1.2	38,65	Review BCF quarterly reports on price level	
		The Commission will specify contents required in BC Ferries quarterly reports respecting fare levels for each route group. The Commission will determine if the weighted average of the tariffs charged for each route group, as measured using the above Average Price Model are within the price cap established, and if not make appropriate orders.	The Commission specified BC Ferries quarterly reporting requirements to be the output of the Average Price Model. These are indices of (a) actual weighted average fare and (b) price cap, with comparisons of the two , for each of the seven route groups, by quarter. At time of writing this Annual Report, the weighted average prices for fiscal 2003/4 had been computed quarterly. The Commission determined that BC Ferries' actual fares were within the price cap for every quarter of fiscal 2003/4.
1.3	42	Handle any BCF applications for extraordinary price increases	
		Commission will review and consider applications by the ferry operator for extraordinary tariff/price cap increases, e.g. due to extraordinary fuel price hikes.	There were no applications for extraordinary price cap increases.
1.4	45	Adjust price cap for any service cuts/route discontinuances	
		The Commission will review service reductions or discontinuance of routes for impact on price cap and make appropriate adjustments in price cap.	There were no service cuts/route discontinuances requiring price cap adjustments. Note that no activity on route discontinuance is allowed before October 2006 under the Coastal Ferry Services Contract between BC Ferries and the Province of BC.

Activity number	Coastal Ferry Act Section	PLANNED ACTIVITY from the 2003/4 Service Plan (issued September 2003)	ACTUAL ACTIVITY in the Reporting Period (August 2003 through March 2004)
1.5	40,41	Conduct price cap review for next performance term	
		The Commission will initiate on or before October 1 2006 a price cap review for second performance term	The Commission gathered background research materials on this topic.
2.0	Regulation of Ferry Service Levels		
2.1	38,65	Review BCF quarterly reports on service level	
		The Commission will specify the format of, and review quarterly reports of BC Ferries as the ferry operator to determine if it is meeting the contract service requirements.	<p>The Commission specified quarterly reporting requirements to BC Ferries. These included (a) tariffs and tariff revenue, (b) ridership and traffic patterns, (c) frequency of ferry service, (d) capacity of the vessels (e) productivity measures and (f) alternative service provision.</p> <p>In 2003/04, BC Ferries delivered 83,294 round trips, which was 208 more round trips than were specified in the published scheduled for the year.</p> <p>BC Ferries met 99.97% of its core service level commitments under the Coastal Ferry Services Contract in 2003/04. During the year, the fire on the Queen of Surrey caused BC Ferries to exceed the 30 cumulative days allowed for temporary service disruptions by 16 days. In addition, total of 9 scheduled round trips were missed due to heavy traffic causing delays on 3 routes; and 1 scheduled round trip was cancelled to accommodate a community event.</p> <p>In addition, due to the first sailings on Christmas and New Years' day not being operated on 8 routes due to low traffic demand, a total of 18 sailings were missed. While these sailings are specified in the Coastal Ferry Services Contract, they were not scheduled sailings and they have not been provided historically by BC Ferries.</p>
2.2	38,66	Review BCF annual reports on service level	
		The Commission will specify the format of, and review annual reports of BC Ferries as the ferry operator to determine if it is meeting the contract service requirements.	The Commission specified BC Ferries annual reporting requirements . The statutory deadlines for BCFS Annual Report and this Commission Annual Report coincide (i.e. July 31, 2004); at time of writing the Commission had not received BC Ferries' Annual Report.
2.3	43	Handle any BCF applications for service cuts	
		Review and consider any applications by the ferry operator for reductions in service (temporary reductions would occur immediately).	The Commission received one application from BC Ferries under this section and issued Order 03-01 . This was authorization for temporary reduction in service on Route 30 (between Tsawwassen and Duke Point, Nanaimo) in late November and early December 2003 and in March 2004, needed for mid-life upgrade of "C" class vessels.

Activity number	Coastal Ferry Act Section	PLANNED ACTIVITY from the 2003/4 Service Plan (issued September 2003)	ACTUAL ACTIVITY in the Reporting Period (August 2003 through March 2004)
2.4	44	Handle any BCF applications for route discontinuance, possibly hold hearing	
		Review and consider any applications by the ferry operator to discontinue a route. After Oct. 2006, route discontinuance applications may be made (the determination process takes 9 months).	There was no activity : route discontinuance is not allowed before October 2006.
3.0 Special Decisions			
3.1	55	On BCF request, decide if a proposed capital deployment is reasonable	
		If a ferry operator makes an application, the Commissioner will consider a proposed capital deployment or capital expenditures in connection with a route or terminal to determine if they are reasonably required. Consultants of various specialties will be engaged to undertake a "process audit" of the BC Ferries analysis.	There was no activity . However, after the fiscal year end BC Ferries made an application for a determination as to whether acquisition of three vessels was reasonably required. The Commission dealt with this application in May-June 2004 and it will be fully reported in the next Annual Report of the Commission.
3.2	38(4)	Deregulate a ferry route if competition sufficient	
		Make a determination of removing the route designation for a route upon which sufficient competition exists so that regulation of that route is no longer necessary	The Commission made no investigations under this section in the reporting period.
3.3	69	Receive from each ferry operator its plan stating how it will seek additional or alternative service providers.	
		The Commissioner will examine the plan. If he considers that the ferry operator has failed to comply with this section he may adjust the productivity factor used in calculating the price cap, and/or order the ferry operator to provide a satisfactory plan, and may order the operator to comply with that plan.	The Commission received BC Ferries' "Section 69 Plan" at the end of the reporting period, being the statutory deadline for a plan for the current performance term. Subsequently, the Commission asked BC Ferries to elaborate upon it.

Activity number	Coastal Ferry Act Section	PLANNED ACTIVITY from the 2003/4 Service Plan (issued September 2003)	ACTUAL ACTIVITY in the Reporting Period (August 2003 through March 2004)
4.0 Enforcement			
4.1	38(2)	Monitor BCF reporting to public	
		The Commissioner will observe how BC Ferries reports its own performance respecting pricing its fares under the price cap, and respecting its service level actually delivered versus the contracted service levels.	The Commission agreed with BC Ferries that the Commission would publish, on its own website, weighted average fare levels and price caps by route group, by quarter. This began in May, 2004. BC Ferries agreed to publish on its website certain other quarterly performance data including: numbers of sailings made by route relative to contract commitments, with reasons for cancellations of sailings; on time performance by route with reasons for delays; and overloads (i.e numbers of full sailings where traffic was left behind) by route. This began in June 2004.
4.2	46	Inspect BCF records as required	
		Order inspections of the records of the ferry operator as necessary.	The Commission found no activity to be necessary under this section.
4.3	48	Issue orders to BCF re: non-compliance with the law as required	
		Issue orders for non-compliance with the legislation as necessary.	The Commission found BC Ferries to be in compliance and no activity was necessary under this section in the reporting period.
5.0 Publication and Outreach			
5.1	52	Maintain Commission records, provide public access	
		Files will be maintained accessible to the public under the Freedom of Information and Protection of Privacy Act. Response to public enquiries will be made via telephone, postal mail, e-mail.	<p>The Commission maintained electronic and paper records of its activities through the reporting period. There were no requests received under the Freedom of Information and Protection of Privacy Act.</p> <ul style="list-style-type: none"> • Approximately 60 members of the general public wrote to or telephoned the Commissioner in person with comments and questions during the reporting period. Every correspondent received a personal, written reply or returned telephone call. • These exchanges resulted in some 180 pieces of correspondence.

Activity number	Coastal Ferry Act Section	PLANNED ACTIVITY from the 2003/4 Service Plan (issued September 2003)	ACTUAL ACTIVITY in the Reporting Period (August 2003 through March 2004)
5.2	52	Publish decisions/determinations/orders/proceedings	
		<p>The Commissioner will publish every decision, determination and order in a manner that the Commissioner believes will bring it to the attention of the public. All such items will be published on the Commission's website, at a minimum.</p>	<p>In August 2003, shortly after the appointment of the Commissioner the Commission established a web site at bcferrycommission.com. This is the medium for publishing decisions, determinations and orders. It provides links to download its Service Plan and Budget and the formal Order 03-01 issued in the reporting period.</p>
5.3	NA	Communicate with public and stakeholders	
		<p>The Commission will actively communicate the role and responsibilities of the Commission to the public; make appearances in the media; make presentations and speeches to stakeholder groups.</p>	<p>The Commission's web site describes its role and activities and gives contact information. To the end of fiscal 2003/4, the website saw the following activity (excluding automated activity from internet robots, worms, and spiders):</p> <ul style="list-style-type: none"> • Number of unique visitors to the website: 1684 (or 7.4 visitors/day) • Number of visits: 2293 (or 10.1 visits/day). <p>Logs show that the majority of visitors accessed the commission website through links posted on the web sites of BC Ferries, the BC Ferry Authority and the BC Ferry Marine Workers Union.</p> <p>During the reporting period, the Commissioner made 2 media appearances, made remarks or speeches in 4 public venues and met several stakeholder groups:</p> <ul style="list-style-type: none"> • in October 2003, the Commissioner was interviewed in phone-in programme on the Bill Good Show on CKNW radio in Vancouver, which broadcasts over much of the service area of BC Ferries. • also in October, he spoke on his role to members of the Chartered Institute of Transport and Logistics in Vancouver and to the members of the BC Ferry Authority at their meeting in Nanaimo. • in October he met the executive of the Gabriola Island Medivac Society on Gabriola to discuss their concerns. • in March, he served as keynote speaker and panelist at a public meeting on the Coastal Ferry Act organized by the Powell River Community Coalition. This was televised and broadcast on local cable television on the Sunshine

			<p>Coast, and mid and north Vancouver Island.</p> <ul style="list-style-type: none"> also in March, he spoke to the board of the Islands Trust meeting on Hornby Island <p>The Commissioner met other stakeholder organizations during the reporting period, visiting the offices and meeting senior executives of Harbourlynx in Nanaimo, the Washington Marine Group in North Vancouver, and of the BC Trucking Alliance in Langley. In Victoria he met executives of US-based ferry operators Blackball Transport, Washington State Ferries and Victoria Clipper. He also met officials of the BC Ferry and Marine Workers' Union for informal discussions on three occasions in Nanaimo and Courtenay-Comox.</p> <p>Establishing contacts with senior government officials, during the year, the Commissioner met the B.C. Deputy Minister of Transport in Victoria, the B.C. Assistant Deputy Minister of Labour in Nanaimo, and the Transport Canada's Regional Director General for Transport Canada in Vancouver.</p>
6.0	Administration and Reporting		
6.1	36	Operate office and engage external support services	
		<p>Establish the office of the Commission. Make arrangements for telephone, mail and electronic access. Rent office space as required.</p> <p>Office operations (secretarial, phone, courier, post, internet, website) Office equipment dedicated to Commission use Obtain accounting, audit, archiving, and legal advice as required.</p>	<p>A “virtual” office was established with dedicated post box, phone, fax, computer and internet connections in Comox, B.C. An accounting and payment system is provided by office of the Attorney General. The Commission has no support staff.</p> <p>After the end of the reporting period, the Commission arranged with the Office of the Attorney General to locate in Victoria an archive and place of record for the originals of official orders of the Commission.</p> <p>The Commission has no professional staff. Mr. Alan Eastwood of North Saanich was engaged on contract as Special Advisor, undertaking a wide range of activities to assist the Commissioner in his duties.</p>
6.2	NA	Research background to ferry operating environment	
		<p>This activity is Commissioner's ferry system familiarization and background study. The Commissioner intends to travel all ferry routes in person.</p> <p>Research and Investigations initiated by Commission</p>	<p>The Commissioner travelled 19 of BC Ferries' 25 designated ferry routes in fiscal 2003/4, covering routes numbered 1, 2, 3, 4, 6, 7, 10, 11, 12, 17, 18, 19, 21, 22, 23, 25, 26, 30 and 40, providing an opportunity for informal discussions with ships' crews and passengers, and to visit ferry-dependent communities. The Commissioner also travelled the competing Harbourlynx catamaran ferry between downtown Vancouver and Nanaimo. The remaining BC Ferries routes 5, 8, 9, 13, 20 and 24 are planned for 2004/5.</p>

Activity number	Coastal Ferry Act Section	PLANNED ACTIVITY from the 2003/4 Service Plan (issued September 2003)	ACTUAL ACTIVITY in the Reporting Period (August 2003 through March 2004)
6.3	59	Prepare Commission's annual budget	
		Budget will include expenditures reasonably expected to be incurred in the following year, supported by a Service Plan for the year.	In September 2003 the Commission issued a Service Plan and Budget through March 31, 2005 . This projected the Commission's total expenditures in 2004/5 at \$267,000 including a 30% contingency allowance.
6.4	53	Report annually to Lieutenant Governor-in-Council	
		<p>Within 4 months after the end of each fiscal year, the Commissioner will make a report to the Lieutenant Governor-in-Council for the preceding fiscal year, setting out briefly</p> <p>(a) all applications and requests for decisions to the commissioner under the Act,</p> <p>(b) all orders issued by the commissioner,</p> <p>(c) the financial statements applicable to the office of the commissioner for that year along with full disclosure of the expenses of, and associated with, the office of the commissioner, and</p> <p>(d) other information the Lieutenant Governor-in-Council directs.</p>	<p>This Annual Report is intended to meet the requirements of this section of the Act.</p> <p>The Lieutenant Governor in Council has not directed that any other information be included.</p>

3 Financial Statements

Accounting

The Commission keeps its accounting records on a cash basis. The following financial report was prepared by the Commissioner and is unaudited.

The Office of the Attorney General provides banking and payment services at no cost to the Commission, maintaining records with its own chart of accounts, on an accrual basis and subject to provincial audit, but in a form not suited to management of the Commission. To the best of the Commissioner's knowledge, the two sets of records reconcile to each other.

Revenues

In fiscal year 2003/4, the total paid to the Commission by BC Ferries under statutory fixed start-up funding was \$236,712.

Expenditures

Expenditures from start-up on August 11, 2003 to the end of the reporting period on March 31, 2004 totaled \$88,751, or 60% of the previously budgetted expenditures of \$148,600 for this period (see details overleaf). Expenditures were below budget mainly because:

- administration and reporting came in \$26,660 less than budget (at 45% of budget expenditures) due in part to "virtual" office operation, and
- there was no activity under "special decisions", where provision for \$42,000 had been made for an expected application under section 55 of the Act for a declaration that BC Ferries proposed capital expenditures on new vessel was reasonably required. This application was received after the end of the reporting period, and its associated costs will be included in fiscal 2004/5.

The cost of operating the Commission represented less than one fiftieth of 1% of BC Ferries' revenue from its marine transportation services (i.e. excluding retail and other ancillary revenue) of \$452,804,000 for 2003/4.

Expenditures for Commissioner's Services

The Commissioner, who is paid on a per-diem fee, received \$47,925 for his services during the period. In addition he was reimbursed \$5,858 for actual travel expenses and \$3,402 for actual other expenses incurred including dedicated office equipment, office supplies, telephone, web site and other communications expenses.

Treatment of Surplus

The Office of the Attorney General has confirmed that the surplus of funds from fiscal 2003/4 estimated by the Commissioner at \$147,961 will carry forward into fiscal 2004/5. Accordingly, it will reduce the future funding requirements payable by BC Ferries for the operation of the Commission.

Office of the BC Ferries Commissioner: Expenditure Summary					
Activity	FY2003/4 (part year starting Aug 11 2003)				
	Fees		Expenses		TOTAL
	Commissioner	Consultants	Travel*	Other**	

(A) Actual Expenditures					
Regulation of Ferry Fares	\$ 13,669	\$ 28,085	\$ 3,775	\$ 20	\$ 45,548
Regulation of Service Levels	\$ 1,688	\$ -	\$ -	\$ -	\$ 1,688
Special Decisions	\$ -	\$ -	\$ -	\$ -	\$ -
Enforcement	\$ -	\$ -	\$ -	\$ -	\$ -
Publication and Outreach	\$ 16,200	\$ -	\$ 3,000	\$ 500	\$ 19,700
Administration and Reporting	\$ 16,369	\$ 2,316	\$ -	\$ 3,131	\$ 21,815
TOTAL	\$ 47,925	\$ 30,400	\$ 6,775	\$ 3,651	\$ 88,751

(B) Budgetted Expenditures (from budget published Sept. 2003)					
Regulation of Ferry Fares	\$ 15,525	\$ 20,000	\$ 5,250	\$ -	\$ 40,775
Regulation of Service Levels	\$ 2,700	\$ -	\$ -	\$ -	\$ 2,700
Special Decisions	\$ 6,750	\$ 30,000	\$ 5,000	\$ -	\$ 41,750
Enforcement	\$ 2,700	\$ -	\$ -	\$ -	\$ 2,700
Publication and Outreach	\$ 9,450	\$ -	\$ 1,750	\$ 1,000	\$ 12,200
Administration and Reporting	\$ 11,475	\$ 27,000	\$ 4,000	\$ 6,000	\$ 48,475
TOTAL	\$ 48,600	\$ 77,000	\$ 16,000	\$ 7,000	\$ 148,600

(A/B) Actual as % of Budget Expenditures					
Regulation of Ferry Fares	88%	140%	72%	NA	112%
Regulation of Service Levels	63%	NA	NA	NA	63%
Special Decisions	0%	0%	0%	NA	0%
Enforcement	0%	NA	NA	NA	0%
Publication and Outreach	171%	NA	171%	50%	161%
Administration and Reporting	143%	9%	0%	52%	45%
TOTAL	99%	39%	42%	52%	60%

*Receipted travel expenses for Commissioner plus consultants

**Includes office equipment, supplies, telephone and miscellaneous costs