



Metro

Los Angeles County
Metropolitan Transportation Authority

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SYSTEM SAFETY AND OPERATIONS COMMITTEE

MAY 16, 2013

SUBJECT: ADVERTISING POLICY

ACTION: REVISE CONTENT GUIDELINES OF METRO'S ADVERTISING POLICY

RECOMMENDATION

Adopt revisions to Metro's Advertising Content Guidelines as detailed in Attachment A. The Advertising Guidelines are a section of the Board-approved Metro System Advertising policy.

ISSUE

In March 2000, the Board adopted a policy for Metro System Advertising (Attachment C). At the September 2012 Executive Management Committee meeting, a motion from Director Yaroslavsky asked staff to review the policy's Advertising Content Guidelines to see if they could be amended to permit advertising from non-profit organizations while preserving the status of the system as a non-public forum. This review, which was presented at the November 2012 Executive Management Committee meeting, resulted in several other recommended changes to the policy language as detailed below. Attachment A is a red-lined version of the current Advertising Content Guidelines showing specific language revisions recommended by staff.

DISCUSSION

Clarification of Tobacco Products Prohibition

The policy states that advertising of all tobacco products is prohibited. Since the policy was adopted, a new product called "electronic cigarettes" has been introduced. While these products do not contain tobacco, they closely simulate smoking. Staff recommends the policy language regarding tobacco products be expanded to also prohibit advertising of any products that simulate or encourage smoking as contained in Attachment A.

Non-Commercial Advertising from Non-Profit Organizations

When adopted in March 2000, the policy's Advertising Content Guidelines included a prohibition on non-commercial advertising. The reason for this limitation was to minimize the likelihood that Metro buses, trains and facilities would be designated as a

“public forum.” If so designated, Metro could be required to accept and display any type of message from any source. Consequently, the policy is viewpoint-neutral and all non-commercial advertising is prohibited, including advertising from non-profit organizations. The policy contains an exception for paid advertising from Governmental Entities, allowing messages from those entities that advance a specific government purpose.

Across the nation, several transit agencies have policies similar to Metro’s prohibiting non-commercial advertising. However, those whose policies do permit non-commercial advertising have encountered legal challenges on occasion when the agencies have rejected ads containing controversial points of view. Many of those legal challenges have been successful, forcing the transit agencies to post the controversial advertising messages. For example, in New York and Washington D.C. last year, transit agencies attempted to prohibit or delay posting of ads making a controversial statement regarding Israel, but were subsequently ordered by the courts to post them. Other transit agencies that permit non-commercial messages have been met with legal challenges when attempting to reject ads on topics such as union employment disputes, atheism and abortion.

In the 13 years since Metro’s current policy was adopted, no litigation has been brought against Metro challenging its policy. Notably, when Santa Monica’s Big Blue Bus, whose non-commercial advertising policy is based on Metro’s policy, faced a legal challenge last year for rejecting ads from a non-profit organization, a federal judge upheld the constitutionality of that policy, ruling that the Ninth Circuit “has held that a non-commercial ban on advertising on municipal buses is constitutional provided the restriction is reasonable and viewpoint-neutral.”

In order to permit advertising from non-profit organizations, the Board could choose to amend the policy to allow paid advertising from non-profits who are specifically partnered with a Governmental Entity. Policy language would define what kind of relationship between a non-profit organization and a Governmental Entity would enable the acceptance of advertising; it would not be sufficient for a Governmental Entity to merely endorse a non-profit, or to place advertising on the non-profit’s behalf. The content of such ads would need to clearly support a specific purpose of the partnering Governmental Entity, and identify the Governmental Entity in the ad. Potential policy language for such an amendment is shown in Attachment B.

However, after conferring with County Counsel, staff does not recommend making this amendment, as any revision that expands the acceptability of non-commercial messages increases the chance that Metro could have to accept ads of an objectionable or controversial nature, or face litigation if such messages are rejected. The current “viewpoint-neutral” nature of the policy’s non-commercial prohibition has served to prevent this potential issue.

Other Subject Matter Restrictions

The policy contains restrictions on certain types of language, images and subjects, including vulgarity, illegal activity and obscene matter. After reviewing the policies of numerous other transit agencies, staff recommends expanding the policy to specifically prohibit content relating to:

- Firearms and gun violence
- Demeaning or disparaging statements
- Adult entertainment
- Political endorsements
- Religion and religious issues
- Unsafe or disruptive transit behaviors

Recommended changes to policy language on these items are contained in Attachment A.

DETERMINATION OF SAFETY IMPACT

Revision of the Content Guidelines does not affect the incidence of injuries or healthful conditions for patrons or employees. Therefore, approval of these revisions will have no impact on safety.

FINANCIAL IMPACT

The staff cost involved with administering the Metro System Advertising Policy and its Content Guidelines is contained in the FY13 budget in Cost Center 7140 Customer Communications, Account 53131, under Project 100002 Governmental & Oversight Activities, Task 01. No additional cost is required to administer the policy revisions discussed in this report. Since this is a multi-year project, the cost center manager and Chief Communications Officer will be accountable for budgeting the cost in future years.

Impact to Budget

The Project 100002 Governmental & Oversight Activities funding source in FY2013 is from the general fund, including Proposition A Administration funds and Proposition C Administration funds.

ALTERNATIVES CONSIDERED

1. Refrain from making some or all of the recommended revisions to the Advertising Content Guidelines. This is not recommended as the recommended revisions add greater specificity to the policy's content restrictions.
2. Adopt the provision to allow non-commercial advertising from non-profit organizations as detailed in Attachment B. This is not recommended because expanding the acceptability of non-commercial messages increases the chance that

Metro could have to accept ads of an objectionable or controversial nature, or face litigation if such messages are rejected.

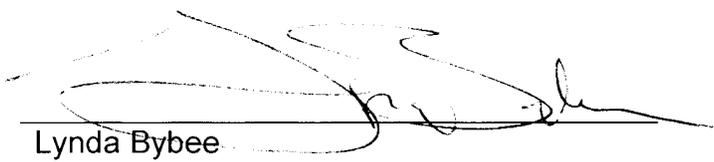
NEXT STEPS

Staff will work with County Counsel as necessary to finalize policy language according to the direction of the Board and implement the revised policy immediately.

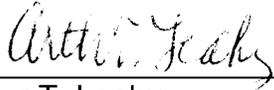
ATTACHMENTS

- A. Current Advertising Content Guidelines red-lined with Recommended Revisions
- B. Potential Policy Language and Statement of Approval regarding Advertising from Non-Profit Organizations
- C. Complete Current Metro System Advertising Policy (COM 6)

Prepared by: Warren Morse, Deputy Executive Officer, Communications, (213) 922-5661



Lynda Bybee
Interim Chief Communications Officer



Arthur T. Leahy
Chief Executive Officer

METRO SYSTEM ADVERTISING POLICY - CONTENT GUIDELINES

Content restrictions for advertising displayed through these arrangements are as follows:

1. Alcohol and Tobacco Advertising

Advertising of all alcohol and tobacco products is prohibited. All products that simulate and/or encourage the act of smoking also are prohibited.

2. Non-Commercial Advertising

Metro does not accept advertising from non-governmental entities if the subject matter and intent of said advertising is non-commercial. Specifically, acceptable advertising must promote for sale, lease or other form of financial benefit a product, service, event or other property interest in primarily a commercial manner for primarily a commercial purpose.

Exception: Governmental entities, meaning public entities specifically created by government action, may purchase advertising space for messages that advance specific government purposes. It is Metro's intent that government advertising will not be used for comment on issues of public debate.

3. Other Subject Matter Restrictions

Advertising may not be displayed if its content involves:

- **Illegal activity** - Promotes or relates to an illegal activity.
- **Violence** - Contains images, copy or concepts that promote guns/firearms or gun violence, or that depict weapons or other devices in an act of violence or harm on a person or animal, or contain any material that incites or encourages, or appears to incite or encourage, violence or violent behavior.
- **Demearing or disparaging matter** - Contains images, copy or concepts that actively denigrate, demean or disparage any individual or group.
- **Vulgar language** - Contains language which is obscene, vulgar, crude, sexually suggestive, profane or scatological.
- **Obscene matter** - Contains obscene matter as defined in the Los Angeles County Code, Chapter 13.17, Section 13.17.010, or

sexually explicit material as defined in the Los Angeles County Code, Chapter 8.28, Section 8.28.010D.

- Adult entertainment – Promotes or displays images associated with adult book stores, video stores, dance clubs or other adult entertainment or sexually-oriented establishments, telephone services, internet sites, films, video games or escort services.
- Political endorsements – Contains messages that are political in nature, including messages of political advocacy, that support or oppose any candidate or referendum, or that feature any current political office holder or candidate for public office, or take positions on issues of public debate.
- Religion - Contains images, content or copy related to religion or religious ideas or viewpoints.
- Negative connotations of public transit - Contains images, copy or concepts that actively denigrate public transportation.
- Unsafe transit behavior – Contains images, copy or concepts that depict unsafe behaviors aboard buses or trains, or in or around transit stations or railroad tracks.
- Metro's endorsement – Contains images, copy or concepts that inaccurately state or imply Metro's endorsement of the subject of the advertisement.
- Harmful or disruptive to transit system – Contains material that is so objectionable as to be reasonably foreseeable that it will result in harm to, disruption of, or interference with the transportation system.

4. Metro's Right of Rejection

Beyond the above, Metro's vendors may review advertising content according to their own guidelines of acceptability. Metro does not screen individual ads submitted to its vendors prior to posting unless specifically requested to do so by the vendors. Nevertheless, in all contracts Metro reserves the right to reject any advertising content submitted for display on its properties and/or to order the removal of any advertising posted on its properties. Decisions regarding the rejection or removal of advertising are made by the Chief Communications Officer or their designee based upon the criteria in this policy statement.

DRAFT POLICY LANGUAGE RE: ADVERTISING FROM NON-PROFIT ORGANIZATIONS AND DRAFT APPROVAL STATEMENT

2. Non-Commercial Advertising

Metro does not accept advertising from non-governmental entities if the subject matter and intent of said advertising is non-commercial. Specifically, acceptable advertising must promote for sale, lease or other form of financial benefit a product, service, event or other property interest in primarily a commercial manner for primarily a commercial purpose.

Exception 1: Governmental Entities, meaning public entities specifically created by government action, may purchase advertising space for messages that advance specific government purposes. It is Metro's intent that government advertising will not be used for comment on issues of public debate.

Exception 2: Metro will accept paid advertising from non-profit organizations that partner with a Governmental Entity (as defined in Exception 1 above) and submit advertising that advances the joint purpose of the non-profit organization and Governmental Entity, as determined by each of them. In order for advertising to qualify under this exception, the advertising must clearly, on the face of the advertising, identify the Governmental Entity and indicate that the Governmental Entity approves, sponsors, or otherwise authorizes the advertising. The non-profit organization must also provide a Statement of Approval (attached) from the Governmental Entity describing the joint purpose to be advanced and setting forth a statement acknowledging support and approval for the submitted advertising. Any message displayed under this exception must adhere to all other content restrictions stated in this policy.

STATEMENT OF APPROVAL

For placement of advertising from Non-Profit Organizations on the Metro system

The information below must be provided in conjunction with any advertising submitted pursuant to Exception 2 of Paragraph 2 in the Metro System Advertising Policy's Content Guidelines.

1. **Non-Profit Organization:** _____

(a) ___ Please attach supporting documentation of Non-Profit status.

2. **Partnering Governmental Entity:** _____

(a) Specific government action that created the Governmental Entity: _____

3. **Title of ad/ad campaign:** _____

(a) ___ Please attach copies of all ads being submitted for placement on the Metro system.

4. **Statement of joint purpose to be advanced by this advertising:**

5. The above-named Governmental Entity ___ a) approves this advertising message; ___ b) is sponsoring this advertising message; ___ c) authorizes this advertising message. (Check all that apply)

I certify that the foregoing statements made about and/or on behalf of the above-named Governmental Entity are true and correct, and that I am authorized to sign on the Entity's behalf.

Authorized Signature _____ Date _____

Name (Please print) _____ Title _____

If this statement cannot be signed by an authorized representative of the Governmental Entity, other documentation must be attached to verify that the Governmental Entity approves, sponsors or otherwise authorizes this advertising message.

I certify that the foregoing statements made on behalf of the above-named Non-Profit Organization, and any attached documentation, are true and correct, and that I am authorized to sign on the Organization's behalf.

Authorized Signature _____ Date _____

Name (Please print) _____ Title _____

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COMMUNICATIONS Metro System Advertising

(COM 6)

POLICY STATEMENT

The Los Angeles County Metropolitan Transportation Authority (Metro) has determined that allowing revenue-generating advertising which does not compromise public or employee safety to be placed in designated areas on its transit properties is a responsible means of maximizing use of the authority's capital investments. Therefore Metro may enter into contracts with outside vendors to sell and display advertising on Metro buses, trains and transit facilities for the sole purpose of generating revenue. Issuance of such contracts must be in accordance with Metro's procurement policies and approved by Metro's Board of Directors. Locations for revenue-generating advertising may include but are not limited to: interiors and exteriors of buses, interiors and exteriors of rail cars, interiors of rail stations, and fixed outdoor displays on Metro property. Metro shall not place or allow any exterior advertising on its Orange Line vehicles. Metro reserves the right to reject any advertising based upon its guidelines for acceptable advertising content contained in this policy statement.

Metro has further determined that advertising on its own properties is a valuable means of communicating with its customers. Therefore Metro explains and promotes its transit services through the dissemination of information onboard the Metro Bus and Metro Rail systems. Informational advertising space is limited, and reserved exclusively for Metro transit information. All messages and materials distributed by this means are prepared, approved and/or authorized by the Chief Communications Officer or their designee.

PURPOSE

To clearly define the use of Metro's revenue-generating advertising space and informational advertising space throughout the Metro System.

APPLICATION

This policy and its procedures apply to all represented and non-represented employees, consultants and Board members.

Chief of SBU

APPROVED: County Counsel or N/A

ADOPTED: CEO

Effective Date: _____

Date of Last Review: _____



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1.0 GENERAL

The display of paid (revenue-generating) advertising carries with it a responsibility to protect the agency from potential litigation and to recognize the potential association of advertising images with Metro services while simultaneously respecting First Amendment principles. The agency addresses these issues through the responsible and consistent application of written criteria for advertising acceptability. It is not Metro's intent to create a public forum through the acceptance of advertising.

At the same time, Metro's ability to reach its customers directly is crucial to adequate dissemination of transit information. Any use of the unique distribution channels at its command (such as allotments of interior and exterior bus advertising space as well as on-board "take-one" boxes and in-station Variable Message Signs) for purposes unrelated to customer information or retention is to be avoided, as it effectively "pre-empts" the availability of transit information to the public. Metro's Communications Department administers the use of these unique distribution channels as part of its overall responsibility for customer communication.

2.0 PROCEDURES

2.1 Revenue-Generating Advertising

Metro contracts with outside vendors to sell and display advertising on bus and rail vehicles and facilities for the sole purpose of generating revenue. Metro does not sell or post advertising directly. Vendors for such contracts are solicited through competitive bids which must conform to Metro's procurement procedures and be approved by Metro's Board of Directors. Such agreements may dedicate no more than 90% of the available space covered by the contract for revenue-generating advertising, reserving the remaining available space for Metro's own transit-related information.

Locations for revenue-generating advertising may include, but are not limited to: exterior surface areas of buses and rail cars (see restrictions in section 2.1.5 below), interior display frames in bus and rail vehicles, back-lit map cases inside stations, automated public toilets and other fixed outdoor displays on Metro property, electronic Variable Message Signs (VMS) on station platforms, banner ads on Metro's website, space in Metro's printed brochures, timetables and other publications and printed materials, and any other location approved by Metro's Board of Directors. Metro shall not place or allow any exterior advertising on its Orange Line vehicles.



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Content restrictions for advertising displayed through these arrangements are as follows:

2.1.1 Alcohol and Tobacco Advertising

Advertising of all alcohol and tobacco products is prohibited.

2.1.2 Non-Commercial Advertising

Metro does not accept advertising from non-governmental entities if the subject matter and intent of said advertising is non-commercial. Specifically, acceptable advertising must promote for sale, lease or other form of financial benefit a product, service, event or other property interest in primarily a commercial manner for primarily a commercial purpose.

Exception: Governmental entities, meaning public entities specifically created by government action, may purchase advertising space for messages that advance specific government purposes. It is Metro's intent that government advertising will not be used for comment on issues of public debate.

2.1.3 Other Subject Matter Restrictions

Advertising may not be displayed if its content:

- Promotes or relates to an illegal activity;
- Contains language which is obscene, vulgar, profane or scatological;
- Contains images, copy or concepts that actively denigrate a specific ethnic or gender group;
- Contains images, copy or concepts that actively denigrate public transportation; or
- Contains obscene matter as defined in the Los Angeles County Code, Chapter 13.17, Section 13.17.010, or sexually explicit material as defined in the Los Angeles County Code, Chapter 8.28, Section 8.28.010D.

2.1.4 Metro's Right of Rejection

Beyond the above, Metro's vendors may review advertising content according to their own guidelines of acceptability. Metro does not screen individual ads submitted to its vendors prior to posting unless specifically requested to do so by the vendors. Nevertheless, in all contracts Metro reserves the right to reject



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any advertising content submitted for display on its properties and/or to order the removal of any advertising posted on its properties. Decisions regarding the rejection or removal of advertising are made by the Chief Communications Officer or their designee based upon the criteria in this policy statement.

2.1.5 Vinyl Window Graphics

To ensure the safety and security of passengers, operators and law enforcement officers, advertising displays which employ vinyl window graphics are restricted from obscuring window surfaces on Metro vehicles as follows:

- Buses: No more than 30% of the vehicle's total window surface, and no more than 50% of the window surface of any bus side, may be covered by vinyl window graphics. (Note: this excludes the front window surface, which may not be covered in any manner.)
- Rail Cars: No windows may be covered on rail cars.
- Metro Rapid: No wrapped advertising, bus backs or oversized king ads are permitted on Metro Rapid vehicles or on any articulated buses.

2.2 Informational Advertising

Metro has several unique distribution channels at its disposal for disseminating transit information for which it incurs no "space" cost (the fee charged for advertising space). These distribution channels include, but are not limited to: "take-one" boxes on board Metro Buses and Metro Rail trains, "take-one" racks at Metro Customer Centers, back-lit and non-lit map cases inside Metro Rail stations and on Metro Bus Stop poles, advertising kiosks at select Metro Rail stations, electronic Variable Message Signs (VMS) on Metro Rail platforms, and interior rail posters on board Metro Rail trains.

In addition, as specified in section 2.1, Metro has the use of an allotment of exterior and interior bus advertising space at no charge by agreement with the vendor that sells all remaining interior and exterior bus advertising space under a revenue-generating agreement.



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Acceptable information for these distribution channels is categorized as follows:

2.2.1 Regular Transit Information

Regular transit information is prepared by Metro's Communications Department in accordance with its annual strategic planning process as well as upon request from other internal departments. Regular transit information includes, but is not limited to: service features and changes, fare information and changes, safety and security messages, maps and explanations of related transportation services.

2.2.2 Cross-Promotional Information

On an occasional basis and only when space is available, Metro's Communications Department may use Metro's distribution channels to participate in cross-promotional opportunities that offer a direct opportunity to promote use of transit. Any materials distributed for this purpose must prominently include promotion of Metro services (i.e. "Go Metro to Fiesta Broadway"). Metro is prohibited by law from simply donating advertising space to any entity for purposes that are not directly transit-related.

The outside organization involved must either bear the cost of producing such materials or, if approved by Metro's Communications Department, provide an equivalent or greater value in cross-promotional benefits (i.e. advertising space, editorial space, etc.). Any cross-promotional arrangement must be approved by the Chief Communications Officer or their designee based upon the criteria in this policy statement.

2.2.3 "Added Value" Materials

On an occasional basis and only when space is available, Metro's Communications Department may use Metro's distribution channels to provide "added value" materials to its customers. Such materials must present a specific and time-dated offer uniquely provided for Metro Bus and Metro Rail customers (generally a money-saving discount) in which transit can be used to access the redemption point. Any materials distributed for this purpose must prominently include the Metro logo and other wording approved by Metro's Communications Department to indicate that the offer is specifically designed for Metro Bus and Metro Rail customers. Metro is prohibited by law from simply donating advertising space to any entity for purposes that are not directly transit-related.



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The outside organization involved must either bear the cost of producing such materials or, if approved by Metro's Communications Department, provide an equivalent or greater value in cross-promotional benefits (i.e. advertising space, editorial space, etc.). Any added value programs must be approved by the Chief Communications Officer or their designee based upon the criteria in this policy statement.

3.0 DEFINITION OF TERMS

Added Value Materials – Informational advertising which offers a tangible benefit to patrons as a means of rewarding and retaining customers (i.e., a money-saving discount).

Cross-Promotion – A cooperative partnership in which two or more entities work together with the goal of jointly promoting their respective services.

Exterior King Ad – Large ad measuring 144" x 30" displayed on the sides of Metro Buses. King ads are directly applied to the bus with adhesive vinyl.

Exterior Tail light or "Tail" Ad – Smaller ad measuring 48" x 15 ½" or 72" x 21" displayed on the rear of Metro Buses. Tail ads are directly applied to the bus with adhesive vinyl.

Governmental Entities – Public entities specifically created by government action.

Interior Bus Car Card – A 28" x 11" poster that mounts above the seats in Metro Buses to provide information on fares, routes, safety, pass & token sales locations, service changes and other matters relevant to the use of the Metro System.

Interior Rail Poster – A 21" x 22 ¼" poster that mounts in frames on the walls of Metro Rail cars, used to display Metro Rail System Maps and provide information on fares, routes, safety, pass & token sales locations, service changes and other matters relevant to the use of the Metro System.

Map Cases – Fixed cases in Metro Rail stations that hold a 46¾" x 46¾" display, usually back-lit. Used to display Metro Rail System Maps and provide information on fares, routes, safety, pass & token sales locations, service changes and other matters relevant to the use of the Metro System.

Non-Commercial Advertising – A public service announcement, event notification, political statement or other message which does not have as its primary purpose to propose a commercial transaction.



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Take-One – A printed brochure measuring 3½” x 8½” placed inside Metro Buses or Metro Rail trains, used to provide information on fares, routes, safety, pass & token sales locations, service changes and other matters relevant to the use of the Metro System.

Take One Box – A metal rack or plastic holder installed on the interior of Metro Buses and Metro Rail trains designed to hold approximately 40 take-ones. Many Metro Buses have a multi-pocket rack in addition to 2 plastic take-one boxes; most Metro Rail cars have from 2 to 6 plastic take-one boxes.

Variable Message Signs (VMS) – Electronic sign boards in Metro Rail stations controlled from the Rail Operations Control Center that scroll through a series of written messages. Used to provide information on safety, pass & token sales locations, service changes, emergency announcements and other matters relevant to the use of the Metro System.

Vinyl Window Graphics – An adhesive vinyl super-graphic which covers a portion of the window surface of a bus or rail vehicle. Such graphics are manufactured to be largely transparent to those inside the vehicle, permitting passengers to see outside through the graphics.

4.0 RESPONSIBILITIES

Communications Department prepares all messages and materials for dissemination on board Metro Buses and Metro Rail trains; administers the distribution/display of transit information; tracks/coordinates the availability and use of Metro’s unique information distribution channels.

Mailroom distributes quantities of take-ones to Metro Operating Divisions and Customer Centers according to distribution list prepared by project managers in Communications.

Operators and Service Attendants physically place take-ones on buses/trains for distribution to the public.

Advertising Vendors sell, post and maintain all revenue-generating advertising on Metro properties; implement Metro’s policies on revenue-generating advertising; post all Metro informational advertising according to instructions from Metro Marketing Department.

Chief Communications Officer (or designee) reviews and approves/rejects all cross-promotions and added value programs using Metro’s unique distribution channels based upon the criteria in this policy statement; enforces Metro’s right to reject and/or order removal of revenue-generating advertising based upon the criteria in this policy statement.



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5.0 FLOWCHART

Not Applicable

6.0 REFERENCES

Not Applicable

7.0 ATTACHMENTS

Not Applicable

8.0 PROCEDURE HISTORY

- | | |
|----------|---|
| 03/23/00 | Original policy adopted by Metro's Board of Directors. |
| 01/27/05 | Policy amended by Board of Directors to permit advertising on Metro Rapid vehicles. |
| 09/26/08 | Biennial review and update. Policy updated to include Board of Directors amendment to permit all forms of non-traditional advertising displays as well as advertising on rail car exteriors and other types of transit service with the exception of Orange Line vehicle exteriors. |



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**Summary of Changes
Metro System Advertising (COM 6)**

NOTE: THIS SUMMARY COVER SHEET IS INTENDED FOR REVIEW PURPOSES ONLY. IT IS NOT INTENDED FOR INTERPRETATION OF POLICY GUIDELINES. REFER TO POLICY DOCUMENT FOR ACTUAL GUIDELINES AND PROCEDURES.

Policy Section	Revision	Reason
Policy Statement	Locations for revenue-generating advertising may include exteriors of rail cars. No exterior advertising is allowed on Orange Line vehicles.	To comply with Board amended advertising policy.
1.0 General	Added section	Per policy template update.
2.0 Procedures	Deleted paragraphs and moved under General section	Per policy template update.
2.1 Revenue-Generating Advertising	Locations for revenue-generating advertising may include exteriors of rail cars. No exterior advertising is allowed on Orange Line vehicles.	To comply with Board amended advertising policy.
2.1.5 Vinyl Window Graphics	No windows may be covered on rail cars. No wrapped advertising, bus backs, or oversized king ads are permitted on any articulated buses.	To comply with Board amended advertising policy.