Fair Registration Practices Report

Engineers (2019)

The answers seen below were submitted to the OFC by the regulated professions.

This Fair Registration Practices Report was produced as required by:

- the Fair Access to Regulated Professions and Compulsory Trades Act (FARPACTA) s. 20 and 23(1), for regulated professions named in Schedule 1 of FARPACTA
- the Health Professions Procedural Code set out in Schedule 2 of the Regulated Health Professions Act (RHPA) s. 22.7 (1) and 22.9(1), for health colleges.

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1. Qualitative Information

a) Requirements for registration, including acceptable alternatives

i. Describe any improvements / changes implemented in the last year.

No changes this year

ii. Describe the impact of the improvements / changes on applicants.

No changes this year

iii. Describe the impact of the improvements / changes on your organization.

No changes this year

b) Assessment of qualifications

i. Describe any improvements / changes implemented in the last year.

Applicants whose experience is not aligned with their academic discipline will be assessed for conformity with legislated experience requirements independent of the applicant's academic discipline.

The process for applications to reinstate a licence was changed so that there is greater reliance on completion of professional development activities and less reliance on experience interviews in assessing applicant qualifications.

PEO has been actively assessing options to update the Professional Practice Examination so that the exam is psychometrically balanced and automated so as to remove any delays or subjectivity introduced by hand-marked exams. A recommendation to proceed with a specific option will be made to Council in early 2020.

Assessment of alternative methods for determining the academic equivalency of non-CEAB degrees and the methodology for reviewing the experience of applicants are also under way. The intent is to identify methods that are more objective and which require less time for applicants to complete requirements.

ii. Describe the impact of the improvements / changes on applicants.

There is no legislated requirement in either the Professional Engineers Act or its Regulations for an applicant's experience to be gained in a particular discipline, or that it correlates to the specific academic requirements met by the applicant. Adopting this policy allows reviewers to consider qualifying work experience that falls outside the specific academic discipline in which an applicant was trained.

The process for assessing reinstatement applications now has a greater reliance on objective information.

iii. Describe the impact of the improvements / changes on your organization.

These process changes have simplified tasks performed by staff and reduced some of the need for applicant interviews conducted by volunteers.

c) Provision of timely decisions, responses, and reasons

i. Describe any improvements / changes implemented in the last year.

The process for reporting assessments of academic requirements and experience requirements was streamlined to minimize delays in issuing registration decisions. These changes conform to legislative requirements for referral to the Academic Requirements Committee and/or the Experience Requirements Committee and their respective requirements set out in Regulation, as well as the requirements for notices of determination and issuance of notices of proposal regarding registration.

The letter to applicants that is sent after successful completion of the Professional Practice Exam was revised to clarify the deadline for submitting their employment experience information. The applicant is also sent a reminder via email one week before the submission deadline.

A flexible staff position has been implemented to cover absences of regular staff so as to reduce unnecessary delays in processing applications.

ii. Describe the impact of the improvements / changes on applicants.

Processing times are minimized and inadvertent disruptions to applications are avoided.

iii. Describe the impact of the improvements / changes on your organization.

Overall process flow for applications is improved.

d) Fees

i. Describe any improvements / changes implemented in the last year.

A 20% increase to all fees was approved by Council at its 524th meeting held on February 8, 2019. This affected fees for applications, examinations, registration, licensing and reinstatements. The fee increase became effective on May 1, 2019. The last fee increase was approved by Council in 2009 and was made effective on January 1, 2010.

ii. Describe the impact of the improvements / changes on applicants.

New applications submitted after May 1, 2019 are subject to the new fee schedule.

iii. Describe the impact of the improvements / changes on your organization.

Billing processes were updated to reflect the new fee schedule.

e) Timelines

i. Describe any improvements / changes implemented in the last year.

The period for qualifying experience for applicants with non-CEAB Bachelor of Engineering degrees now starts on the date of graduation, regardless of whether the applicant has been required to complete a set of examinations under a Confirmatory Examination Program (CEP) or Specific Examination Program (SEP).

Applicants who are assigned an engineering report (thesis) by the Academic Requirements Committee can now submit the report at any time after it has been assigned.

ii. Describe the impact of the improvements / changes on applicants.

Previously, applicants with non-CEAB Bachelor of Engineering degrees had to complete examination requirements before their engineering work experience could be considered, which extended the time needed to complete licensing requirements.

Previously, applicant had to complete any assigned technical examinations prior to submitting an assigned engineering report.

iii. Describe the impact of the improvements / changes on your organization.

These policy changes are consistent with legislated requirements and resulted in overall improvement in processing times for the affected applications.

f) Policies, procedures and/or processes, including by-laws

i. Describe any improvements / changes implemented in the last year.

Council approved in principle the initial "Policy on Eliminating Bias in the Registration Process" at its 524th meeting held on February 8, 2019. The policy has been provided to the Office of the Fairness Commissioner for review and is subject to refinement as it is implemented in the licensing and registration process.

PEO's administrative By-Law No. 1 was updated on May 1, 2019 to update all licensing, registration and administrative fees. Fees for re-marking of examinations and writing exams outside of Canada were not previously listed in the by-law and were added at this time.

The Financial Credit Program for new applicants was changed as of May 1, 2019 from a waiver of fees for the licence application and the first year of enrolment as an engineering intern to a credit of these fees against the applicant's registration and initial licensing fees.

At PEO Council's 530th meeting on November 15, 2019 a decision was taken to rescind an earlier motion to extend the fee remission policy to include engineering interns. The policy allows licensees who have retired from active practice, or who are temporarily unable to practice due to health or economic issues, to continue their respective registrations at 25% of the corresponding fee.

At the 530th Council meeting a motion was also passed to cancel the fee that was previously applied for applicants who take an academic course in lieu of their first assigned technical examination. The fee had been applied to reflect the administrative component of the first examination fee that was associated with opening and administering and examination file for the applicant, while the fee for corresponding exam component was waived.

ii. Describe the impact of the improvements / changes on applicants.

The introduction of the Elimination of Bias policy reinforces PEO's commitment to handle all registration matters in a manner that is transparent, objective, impartial and fair to all applicants.

The addition of fees not previously recorded in the by-law has no net impact to applicants.

The change to the Financial Credit Program alters the timing of the discount for qualified applicants to coincide with the timing of their registration.

Enrolment as an engineering intern is not compulsory for applicants and does not affect their ability to acquire qualifying work experience. There is no impact to an applicant's eligibility for licensure by suspending his or her enrolment rather than having the option to maintain enrolment under fee remission.

Cancellation of the fee for an academic course taken in lieu of a first technical exam reduces the overall financial burden for affected applicants.

iii. Describe the impact of the improvements / changes on your organization.

Staff and volunteers who are involved in the registration process are introduced to the Elimination of Bias policy, and provided additional awareness training where appropriate for their specific activities.

Administrative changes were required for changes to billing for the associated fees or credits.

g) Resources for applicants

i. Describe any improvements / changes implemented in the last year.

PEO has introduced an editable form for applicant referees that can be completed and submitted electronically.

A "What to Expect" section was added to PEO's website information for corresponding licence applications. This provides the applicant with guidance on the timelines associated with processing their respective application.

ii. Describe the impact of the improvements / changes on applicants.

The editable referee form will reduce delays associated with the collection of referee feedback.

The "What to Expect" information helps applicants to understand the associated timelines and are consistent and easily accessible.

iii. Describe the impact of the improvements / changes on your organization.

These resources are expected to improve PEO's operational efficiency.

h) Review or appeal processes

i. Describe any improvements / changes implemented in the last year.

No changes this year

ii. Describe the impact of the improvements / changes on applicants.

No changes this year

iii. Describe the impact of the improvements / changes on your organization.

i) Access to applicant records

i. Describe any improvements / changes implemented in the last year.

No changes this year

ii. Describe the impact of the improvements / changes on applicants.

No changes this year

iii. Describe the impact of the improvements / changes on your organization.

No changes this year

j) Training and resources for registration staff, Council, and committee members

i. Describe any improvements / changes implemented in the last year.

Training was provided to registration staff and members of the Experience Requirements Committee and Academic Requirements Committee regarding the new Elimination of Bias policy. Statutory training in both workplace harassment and the *Accessibility for Ontarians with Disabilities Act* was also provided to all staff and volunteers.

ii. Describe the impact of the improvements / changes on applicants.

A consistent and objective process is being applied to all registration matters.

iii. Describe the impact of the improvements / changes on your organization.

There is a heightened awareness among staff and volunteers of fairness requirements and how these apply to their activities.

k) Mutual recognition agreements

i. Describe any improvements / changes implemented in the last year.

No changes this year

ii. Describe the impact of the improvements / changes on applicants.

No changes this year

iii. Describe the impact of the improvements / changes on your organization.

No changes this year

I) Other (include as many items as applicable)

i. Describe any improvements / changes implemented in the last year.

PEO now requires an affidavit to confirm that documentation regarding a change of name is genuine. This policy was implemented to ensure that PEO is able to confirm the legal identity of the individuals who will obtain a licence.

PEO has implemented a policy for the destruction of unsolicited documents that are not associated with an active application. Documents that do not pertain to a filed application will be retained for six months and then shredded, unless an application is commenced during that period.

PEO will be making a determination on minimum information requirements for submission of an application to limit the processing of application files with incomplete information.

ii. Describe the impact of the improvements / changes on applicants.

These changes place a responsibility on applicants to provide information that is accurate and complete so as to avoid unnecessary delays in processing their application.

iii. Describe the impact of the improvements / changes on your organization.

These changes allow licensing staff to focus productively on applications that are complete and ready for processing.

Describe any registration-related improvements/changes to your enabling legislation and/or regulations in the last year

Three amendments were made to R.R.O. 1990, Reg. 941: General in 2018 which were not reported in the 2018 Fair Registration Practices report. Two of these amendments are relevant to fair registration practices.

O.Reg. 36/18 implemented changes to replace instances of prescribed fees with a reference to "applicable fees specified by the by-laws" and to revoke sections that were contingent on the repeal of clause 12(3)(a) of the *Professional Engineers Act* (a.k.a. the "industrial exception"). The regulation came into force on February 23, 2018. These changes allow PEO to make changes to fees without explicit government approval by Order-in-Council.

O.Reg. 305/18 implemented changes to include French terminology in the regulation and to add a full French language version of the Regulation. The regulation came into force on April 23, 2018.

Council passed a motion at its 530th meeting on November 15, 2019 to propose an amendment subsection 19(1) of the *Professional Engineers Act* to restore the express requirement that the Registrar shall issue a Notice of Proposal to applicants who are refused a licence, temporary licence, limited licence, provisional licence or certificate of authorization for the reason that the applicant failed to meet the corresponding requirements and qualifications. This would correct an earlier amendment that removed the explicit statutory requirement for a Notice of Proposal.

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2. Quantitative Information

i	a) Languages	which explication inform		
	indicate the languages in v	vnich application inform	ation materials were available in the reporting year.	
	Language	Yes/No		
	English	Yes		

French Other (please specify) Additional comments:

Although a French version of the regulation R.R.O. 1990, Reg. 941: General is now available, all application materials remain available in English-only versions. This is consistent with a non-statutory policy that applicants and licensees have a basic competence for written communication in English with respect to their professional practice.

b) Gender of applicants

Indicate the number of applicants in each category as applicable.

No

Gender	Number of Applicants
Male	4416
Female	1031
None of the above	0
Additional comments:	

c) Gender of members

Indicate the number of members in each category as applicable. Select the option that best corresponds to the terminology used by your organization.

Gender	Number of Members
Male	75623
Female	10026
None of the above	0
Additional comments	

d) Jurisdiction where applicants obtained their initial education

Indicate the number of applicants by the jurisdiction where they obtained their initial education¹ in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other Int	ernational	Unknown	Total
			India	802		
			Iran	329		
			China	107		
			Pakistan	105		
			Egypt	98		
2632	222	52	Nigeria	69	331	5447
			U.K.	55		
			Syrian Arab Republic	45		
			Jordan	39		
			Bangladesh	37		
			Brazil	37		

Ontario	Other Canadian Provinces	USA	Other Int	ernational	UnknownTo
			Iraq	34	
			Turkey	27	
			United Arab Emirates	27	
			Philippines		
			Lebanon		
			Venezuela		
			Nepal		
			Russia		
			Colombia		
			Libyan Arab Jamahiriya		
			Italy		
			Korea, Republic Of		
			Mexico		
			Sudan		
			Ukraine		
			Australia		
			Greece		
			S. Africa		
			Afghanistan		
			Ghana		
			Ireland		
			Ethiopia		
			Malaysia		
			Morocco		
			S Arabia		
			Spain		
			Trinidad		
			Cyprus		
			Dominican Republic		
			Palestinian Territory, Occupied Portugal		
			Romania		
			Cuba		
			Germany		
			Hong Kong		
			Sri Lanka		
			Tunisia		
			Jamaica		
			New Zealand		
			Poland		
			Albania		
			Belgium		
			France		
			Hungary		

Ontario	Other Canadian Provinces	USA	Other Int	ernational	Unknown	Total
			Indonesia	3		
			Israel	3		
			Latvia	3		
			Serbia	3		
			Viet Nam	3		
			Czech Republic	2		
			El Salvador	2		
			Eritrea	2		
			Guyana	2		
			Peru	2		
			Uzbekistan	2		
			Yemen	2		
			Algeria	1		
			Argentina	1		
			Austria	1		
			Azerbaijan	1		
			Bosnia And Herzegovina	1		
			Bulgaria	1		
			Cameroon	1		
			Congo, The Democratic Republic	1		
			Costa Rica	1		
			Croatia	1		
			Honduras	1		
			Japan	1		
			Kazakhstan	1		
			Lesotho	1		
			Mauritius	1		
			Moldova, Republic Of	1		
			Myanmar	1		
			Papua New Guinea			
			Senegal			
			Swaziland			
			Sweden	1		
			Taiwan, Province Of China			
			Tanzania, United Republic Of			
			Thailand			
			Uganda			
				2210		

¹ Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

Additional comments:

e) Jurisdiction where applicants who became registered members obtained their initial education

Indicate the number of applicants who became registered members in the reporting year by the jurisdiction where they obtained their initial education¹ in the profession or trade.

)ntario	Other Canadian Provinces	USA	Other Int	ernational	Unknown	Tota
			Iran	274		
			India	146		
			China	80		
			Pakistan	58		
			Egypt	57		
			Bangladesh	31		
			Iraq	21		
			U.K.	21		
			Nigeria	17		
			Philippines			
			Syrian Arab Republic			
			Romania			
			Brazil	11		
			Russia	11		
			Lebanon			
			Ukraine			
			Colombia			
			Ireland			
			Sri Lanka			
			United Arab Emirates			
1820	134	32	Turkey		0	29
			Venezuela			
			Italy			
			Jordan			
			Serbia			
			Australia			
			Bulgaria			
			Guyana			
			Israel			
			Nepal			
			Mexico			
			New Zealand			
			Spain			
			Cuba			
			Ethiopia			
			Germany			
			Ghana			
			Malaysia			
			S. Africa			
			Sudan			
			Albania			

Ontario	Other Canadian Provinces	USA	Other Int	ernational	UnknownTota
			Algeria	2	
			Chile	2	
			Ecuador	2	
			Korea, Republic Of	2	
			Libyan Arab Jamahiriya	2	
			Netherlands	2	
			Poland	2	
			Singapore	2	
			S Arabia	2	
			Trinidad	2	
			Uzbekistan	2	
			Afghanistan	1	
			Armenia	1	
			Austria	1	
			Belarus	1	
			Belgium	1	
			Croatia	1	
			Dominican Republic	1	
			France	1	
			Greece	1	
			Hong Kong	1	
			Iceland	1	
			Jamaica	1	
			Kuwait	1	
			Macedonia, The Former Yugoslav	.1	
			Mauritius		
			Morocco	1	
			Palestinian Territory, Occupied	1	
			Peru		
			Switzerland		
			Turkmenistan		
			Uganda		
			Zimbabwe		
			Total		

¹ Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

Additional comments:

f) Jurisdiction where members were initially trained

Indicate the total number of registered members by jurisdiction where they obtained their initial education¹ in the

profession or trade.

ntario	Other Canadian Provinces	USA	Other Int	ernational	Unknown	Tot
			India	2774		
			China	2768		
			Iran	2513		
			U.K.	2202		
			Egypt	1312		
			Romania	1194		
			Pakistan	1069		
			Bangladesh	589		
			Poland	588		
			Iraq	495		
			Serbia	449		
			Russia	414		
			Sri Lanka	295		
			Colombia	257		
			Ukraine	250		
			Turkey	239		
			Philippines	234		
			S. Africa	186		
			Hong Kong	172		
			Syrian Arab Republic	167		
			Lebanon	165		
9847	10861	2011	Bosnia And Herzegovina	151	683	856
			Israel	150		
			France	141		
			Czech Republic	137		
			Venezuela	134		
			Brazil	134		
			Ireland	133		
			Germany	131		
			Australia	130		
			Croatia	126		
			Korea, Republic Of	122		
			Bulgaria	115		
			Nigeria	114		
			Mexico	107		
			Jordan	107		
			Trinidad	104		
			Hungary	96		
			Taiwan, Province Of China	83		
			Argentina	74		
			Albania	72		
			Algeria	67		
			Slovakia	65		

ntario	other Canadian Provinces	USA	Other Int	ernational	Unknown To
			Peru	61	
			Guyana	60	
			Macedonia, The Former Yugoslav	59	
			Cuba	54	
			Italy	54	
			Kenya		
			New Zealand		
			Netherlands	47	
			Nepal	39	
			Sudan		
			Spain		
			Ethiopia		
			Belarus		
			Chile		
			Ghana		
			Greece		
			Switzerland		
			S Arabia		
			Morocco		
			Japan		
			Kuwait		
			United Arab Emirates		
			Libyan Arab Jamahiriya		
			Jamaica		
			Tunisia		
			Latvia	21	
			Belgium	20	
			Viet Nam	20	
			Yugoslavia	19	
			Dominican Republic	16	
			Indonesia	16	
			El Salvador	16	
			Sweden	15	
			Malaysia	14	
			Denmark		
			Portugal	14	
			Thailand		
			Cyprus		
			Palestinian Territory, Occupied		
			Myanmar		
			Ecuador		
			Lithuania		
			Uzbekistan		
			Singapore	12	

ntario	Other Canadian Provinces	USA	Other Inter	rnational	Unknown T	۲ot
			Austria 1	1		
			Finland 1	1		
			Cameroon 1	1		
			Azerbaijan 1	0		
			Norway 1	0		
			Mauritius 9)		
			Honduras 8	3		
			Afghanistan 8	3		
			Zimbabwe 8	3		
			Costa Rica 8	3		
			Moldova, Republic Of 7			
			OTHER 7			
			Malta 7			
			Armenia 5			
			Nicaragua 5			
			Uganda 5			
			Paraguay 5			
			Kazakhstan 5			
			Zambia 5			
			Georgia 4			
			Tajikistan 4			
			Haiti 4			
			Tanzania, United Republic Of 4			
			Estonia 3			
			Congo, The Democratic Republic 3			
			Senegal 3			
			Barbados 3			
			Somalia 3			
			Slovenia 2			
			Yemen 2			
			Eritrea 2			
			Iceland 2	2		
			Bolivia 2	2		
			Sierra Leone 2	2		
			Malawi 1			
			Kyrgyzstan 1			
			Guatemala 1			
			Congo 1			
			Panama 1			
			Mozambique 1			
			Gabon 1			
			Guinea 1			
			Turkmenistan 1			

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
			Suriname 1		
			Burkina Faso 1		
			Total 22247		

¹ Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

Additional comments:

OTHER = Republic of Kosovo (disputed region of Serbia)

g) Applications processed

Indicate the number of applications your organization processed in the reporting year:

Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)

from January 1 st to December 31 st of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
New applications received	2632	222	52	2210	331	5447
Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)	4085	310	108	4070	20	8593
Inactive applicants (applicants who had no contact with your organization in the reporting year)	4978	320	64	1637	31	7030
Applicants who met all requirements and were authorized to become members but did not become members	138	7	1	40	0	186
Applicants who became FULLY registered members	1820	134	32	958	0	2944
Applicants who were authorized to receive an alternative class of licence ³ but were not issued a licence	0	0	2	1	6	9
Applicants who were issued an alternative class of licence ³	18	5	21	19	0	63

¹ An alternative class of licence enables its holder to practice with limitations, but additional requirements must be met in order for the member to be fully licensed.

Additional comments:

Alternative classes of licence details:

Ontario: 18 Limited Licences issued

Other CAN: 3 Limited Licences and 2 Temporary Licences issued

USA: 21 Temporary Licences issued; 2 applicants did not obtain a Temporary Licence

International: 5 Limited Licences, 4 Temporary Licences and 10 Provisional Licences issued; 1 applicant did not obtain a Provisional Licence

Unknown: 6 applicants with unknown or unspecified training did not obtain a Temporary Licence

h) Classes of certificate/license

Inidcate and provide a description of the classes of certificate/license offered by your organization.

You must specify and describe at least one class of certificate/license (on line a) in order for this step to be complete.

#	Certification	Description
# a)	Certification	Description (a)A licence to practice as a professional engineer is issued to applicants who meet the following requirements:1. be at least 18 years old. 2. be of good character.3. meet the academic requirement
		The experience requirements are met if the applicant has obtained a minimum of 48 months of qualifying engineering work experience, including at least 12 months obtained in a Canadian jurisdiction.
b)	Temporary Licence (TL)	Description (b)

		A temporary licence is issued on a project and discipline basis to engage in the practice of professional engineering for a maximum period of 12 months from approval. One does not have to be a citizen of Canada or a permanent resident of Canada to apply for a temporary licence.			
		Description (c)			
c)	Limited Licence (LEL)	A limited licence is issued to engineering technologists or scientists who, by virtue of many years of specialized engineering experience, have demonstrated competence in a specific aspect of engineering. If that engineering competence is within the scope of professional engineering practice (i.e. impacts on the public), the legislation provides for the issuing of a limited licence covering that aspect of professional engineering practice.			
		Description (d)			
d) Licensed Engineering Technologist (LET)	A Licensed Engineering Technologist designation is granted to those LEL holders who applied after July 1, 2015, and who concurrently maintain their CET registration with the Ontario Association of Certified Engineering Technicians and Technologists (OACETT).				
		Description (e)			
e)	Provisional Licence (PL)	A provisional licence may be issued to an applicant for a professional engineer (P.Eng.) licence who has satisfied all of PEO's licensing requirements except for the minimum 12 months of verifiable and acceptable engineering experience in a Canadian jurisdiction, under the supervision of a professional engineer licensed in the jurisdiction in which the work was undertaken.			
	onal comments:				

i) Reviews and appeals processed

State the number of reviews and appeals your organization processed in the reporting year (use only whole numbers; do not enter commas or decimals).

		essional design		itano)		
om January 1 st to December 31 st of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total

Applications that were subject to an internal review or that were referred to a statutory committee of your governing council, such as a Registration Committee	0	0	0	6	0	6
Applicants who initiated an appeal of a registration decision	0	0	0	8	0	8
Appeals heard	0	0	0	1	0	1
Registration decisions changed following an appeal	0	0	0	0	0	0

Additional comments:

Two applicants abandoned their requests for a registration hearing, resulting in only 6 requests referred for hearings.

One registration hearing commenced in 2018 and concluded in 2019. This is recorded as an Appeal but is technically a review by PEO's Registration Committee; the final decision did not change the original registration decision.

j) Paid staff

In the table below, enter the number of paid staff employed by your organization in the categories shown, on December 31 of the reporting year.

When providing information for each of the categories in this section, you may want to use decimals if you count your staff using half units. For example, one full-time employee and one part-time employee might be equivalent to 1.5 employees.

You can enter decimals to the tenths position only. For example, you can enter 1.5 or 7.5 but not 1.55 or 7.52.

Category	Staff
Total staff employed by the regulatory body	107
Staff involved in appeals process	5
Staff involved in registration process	35

Additional comments:

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3. Submission

I hereby certify that:

Name of individual with authority to sign on behalf of the organization: Johnny F. Zuccon

Registrar

Date: 2020/02/27

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