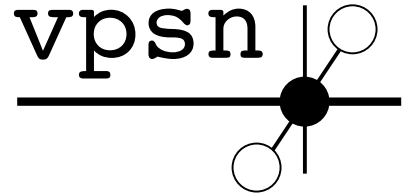


April 30, 2007



Members of the Parks Board
Vancouver Board of Parks and Recreation
2099 Beach Avenue
Vancouver, BC, V6G 1Z4

**Re: Draft Naming Rights and Commemorative Naming Policies
for Park Board Community Facilities**

Dear Members of the Parks Board,

I am writing on behalf of the Vancouver Public Space Network (VPSN) with regard to the Draft Naming Rights and Commemorative Naming Policies for Park Board Community Facilities. I would like to begin by thanking you for providing this opportunity to comment.

The VPSN is a grassroots organization that works on issues of advocacy, education and outreach relating to public space issues in Vancouver and its environs. We were pleased to take part in the broad City of Vancouver public consultation held last year and provided feedback to City staff at that time.

I will start by outlining our recommended course of action with regard to the Naming Policy:

- (1) Disallow corporate naming on new and existing civic facilities and/or interior and exterior components - specifically, Section 7.1.iii - Interior facility Components - Remove Corporate Naming from the list of approved naming entities.**
- (2) Direct staff to determine a more suitable way to recognize key corporate donors to civic amenity development and redevelopment projects**
- (3) Strengthen components of the Naming Rights policy that allow individual naming but not corporate naming - to ensure that individuals whose names are synonymous with corporate names are accounted for in a way that is fair, and to further ensure that defacto corporate naming is not allowed in these situations.**

In support of these recommendations, I would like to draw your attention to the concerns that we have about the new policies. I will begin with a general expression of concern about corporate Naming Rights before moving into looking at specific points of concern that arise in the structure of the new policies.

(1) Naming Rights - General Concerns

To start, the VPSN would like to commend the Parks Board for its initiative in requesting that these policies be developed and recognizing the need for a more a uniform approach to dealing with Naming applications. We recognize that the issues it refers to are often contentious and that developing policy in this area is a challenging venture. We support the draft policies as they relate to commemorative naming.

We are concerned, however, that key features of the draft policies - most notably as they connect to corporate naming - remain problematic.

Speaking broadly, the VPSN believes that Naming Rights, particularly corporate naming of civic facilities, exist largely as form of marketing activity not unlike other forms of advertising or branding. Naming activities are often presented as a form of corporate social responsibility because they allows corporations - often for a fairly nominal cost compared to other forms of advertising - to achieve a high degree of advertising visibility while claiming to be supporters of arts, culture, recreation, and other important activities. And while it is true that such contributions - particularly in an era of heightened fiscal accountability and government cutbacks - does assist civic facilities, we believe it would be an error for the Parks Board to assume that the motivations for such contributions are a result of some form of benign corporate generosity. On the contrary: we would posit that an extremely high return on marketing dollar is far more of a motivating force for corporate naming. Consider that just one event held in "ABC Community Centre Room" means that all tickets, radio and television advertising, flyers, leaflets and programs, as well as related media commentary, inevitably lead to related exposure for ABC Corporation. Multiply this by the years-long duration of the Naming contract, and you will quickly get a sense for the type of marketing exposure that Naming Rights will afford to a corporation or individual.

Rather than looking at corporate naming as a form of corporate contribution to civic amenities, it is often more accurate to consider the sale of naming rights to be a form of unintended municipal subsidization for corporate marketing. Not only does the minimal return of naming contributions (versus civic tax dollars) assist in underwriting *extremely* valuable branding activity, but the fact that the facility is a civic structure guarantees a generous audience exposure owing to the high volume of usage associated with many city-owned facilities.

This dynamic plays out regardless of whether the naming is on interior or exterior facility components, or whether it is on a park board facility or any other public amenity (e.g. sports, cultural, or social service/childcare facility). Naturally the scale of marketing impact is different in each case, but it is no less problematic. Where ABC Theatre is more pronounced, there is still a problem if you take your child to the Diaper Brand Playroom everyday, or hit the AthleticWear squash courts in your local community centre. Citizens using the facilities are exposed to marketing messages that they are, in fact, underwriting.

All of this is problematic enough without the additional fact that only in very rare occasions do corporate/private donations for facilities ever approach the degree of investment made by the main contributor - the public. It is worth mentioning this, because the inadvertent effect of selling off naming rights to a corporate contributor who provides a nominal percent of building or operating costs, is that it seems to diminish the apparent worth of the public contribution as well.

We make these remarks as a form of context. In so doing, I wish to clarify that the VPSN is not opposed to corporations and other benefactors contributing to parks, greenspaces, or to the arts, culture, recreation and civic life in general. In fact, we believe they should. But contributions shouldn't entail the right to put a corporate name on the side of a building, or on interior or exterior facility components.

There are other ways that such contributions can be acknowledged: an interior donor plaque, such as is used at the Vancouver East Cultural Centre is an excellent example. We believe that this draft report presents is an opportunity to explore better, less-overt, less-problematic ways to recognize donors to civic amenity development. We would encourage the Parks Board to consider directing staff to extend their investigations in this regard.

Should the Parks Board opt to proceed with the proposal in its present form, we also wish to note that we have additional concerns around some of the "General Principles" that are identified. We have comments on all points, but will reference two items in particular:

Section 6.4 and 6.5 - Re: Parks Board span of control. The draft policy does not preclude preferential treatment if such preferential treatment is deemed part of the Naming rights agreement. This clause essentially renders itself neutral and says basically that preferential treatment can be built into the contract, but that no *additional* preferential treatment can be bestowed. In other words, if Coca-cola purchased the corporate naming rights on a Park Board gymnasium, there are no provisions that preclude them from negotiating that all products in vending machines are coke products, and nothing to prevent the Parks Board from doing so - provided that this is outlined in the initial contract.

(3) Individual Naming

We would now like to make a few brief remarks around Individual Naming opportunities as they are discussed in the draft policies.

We concur with City staff that issues surrounding individual naming are less contentious and more acceptable than that of corporate naming. However, we still have concerns similar to those that we noted in the public consultation.

Our particular concern connects to individual names that are, in essence, the same as corporate names - either by virtue of a direct link (as in, e.g. Jim Pattison/Pattison Inc.) or through strong associations between the named individual and a linked corporation. We noted that the distinction between corporate and individual naming has the potential, in some cases, to become blurry and would propose that Council request clarification from staff as to how the Naming Rights policies might account for this. For example, does (Jim) Pattison get to name Park Board facilities just because his personal name is indistinguishable from the name of the corporation he owns? Not only does this allow for an unequal playing field between sponsors, but it also allows the potential for a defacto form of corporate naming to take place in the very categories of facility that attempt to disallow this.

We would like to request clarification of this point and would like to request that Mayor and Council determine whether or not there is a way to strengthen the language of the proposed policy to account for these sorts of cases.

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Given that a the majority (59%) of respondents in the most recent City of Vancouver consultation indicated an opposition to corporate naming, and given the general concerns we have identified here, the VPSN is asking Council to postpone adopting the draft Naming Rights policy and to consider the three recommendations outlined on the first page of this letter.

Members of the Parks Board, I would like to thank you again for allowing me to comment on behalf of the Vancouver Public Space Network. Should you have any questions about our comments, please feel free to contact me at the email address listed below.

Yours sincerely,

-signed-

Josh Paterson,
Vancouver Public Space Network

info@vancouverpublicspace.ca
www.vancouverpublicspace.ca

cc:

Commissioner - Ian Robertson - igrobertson@telus.net
Commissioner - Korina Houghton - korina.houghton@vancouver.ca
Commissioner - Allan De Genova - adegenova@sutton.ca
Commissioner - Spencer Herbert - spencer.herbert@vancouver.ca
Commissioner - Heather Holden - heather@heatherholden.ca
Commissioner - Loretta Woodcock - lorettaisalways@shaw.ca
Commissioner - Marty Zlotnik - martyz@zlc.net