



## Report to the Board of Supervisors

Prepared by the Maricopa County Environmental Services Department



Environmental Services  
Department

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### Board of Health (BOH)

**Meeting Date:** April 27, 2015

### Board of Supervisors

**Hearing Date:** July 22, 2015

**Case #/Title:** ES-2015-002/Micro Market Fees

**Supervisor Districts:** All Districts

**Applicant:** Maricopa County Environmental Services Department  
(Department)

**Request:** Approve proposed revision to Maricopa County Environmental Health Code (MCEHC) – to develop new fees that are specific to Micro Markets and more accurately reflect service costs.

**Support/Opposition:** The Department has received one supporting comment and no opposing comments on the proposed changes.

One stakeholder attended the March 26, 2015 stakeholder workshop and verbally stated her support and appreciation with the Department for understanding her concerns and working with the industry to develop Micro Market regulations.

### Department

**Recommendation:** Staff recommends the Board of Supervisors (BOS) approve the proposed revisions to the MCEHC

### BOH

**Recommendation:** Approve per Department recommended language and proceed on the EROP expedited process.

### Executive Summary:

On December 10, 2014, the Board of Supervisors (BOS) approved Micro Market language in Chapter VIII of the MCEHC. Also, on this date the BOS took note of the Automatic Merchandizing Council's public request to go forward with the fee portion for Micro Markets.

Currently applied Department Micro Market fees include the "All Other Food Establishments, Environmental Health Plan Review" fee (\$615.00) and the "Retail Food Establishment, Class 2, Food Environmental Health Operating Permits" fee (\$235.00).

The Department is proposing reductions of current Micro Market Environmental Health fees pursuant to Arizona Revised Statute § 11-251.08 and County Policy that requires 100% cost recovery for provided services. Proposed fees include: Micro Market Operating Permit (\$155), Micro Market Reference Plan (\$270) and the Micro Market Permit Processing Fee (\$20).

This proposed regulatory change is following the EROP policy and workflow process and fee changes are requested.

In accordance with the Maricopa County Resolution, "Moratorium on Increased Regulatory Burdens," the County Manager authorized the Department to proceed with this case in July 2014.

The Department conducted a stakeholder workshop on March 26, 2015. Then on April 27, 2015 the Department presented a Staff Report for this case to the Board of Health (BOH) at which time the BOH voted for this case to proceed on the EROP expedited process and that the BOS adopt the proposed Department revision.

Elaine Arena, an Arizona Automatic Merchandising Council representative, who supports case ES-2015-002/Micro Market Fees, attended the April 27, 2015 BOH meeting. At the meeting, Ms. Arena expressed her intention to approach the BOS for Micro Market fees to be retroactive to December 2014 when Micro Markets were defined in the MCEHC.

**Presented by:** **Steven J. Goode, REHS, Director**

**Attachments:** Report to BOH 4/27/15 (16 pages)  
County Manager Memo – (1 Page)  
Code Mockup – (4 Pages)  
Presentation – Stakeholder Workshop 3/26/15 – (4 Pages)  
Minutes – Stakeholder Workshop 3/26/15 – (2 Pages)  
Stakeholder input and responses received (2 Pages)



## Report to the Board of Health To Approve For Expedited Process

Prepared by the Maricopa County Environmental Services Department



Environmental Services  
Department

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<b>Case #/Title:</b>	ES-2015-002/Micro Market Fees
<b>Meeting Date:</b>	April 27, 2015
<b>Supervisor Districts:</b>	All Districts
<b>Applicant:</b>	Maricopa County Environmental Services Department (Department)
<b>Request:</b>	Approve this Maricopa County Environmental Health Code (MCEHC) proposal for the Enhanced Regulatory Outreach Program (EROP) Expedited Process to develop new fees that are specific to Micro Markets and more accurately reflect service costs.
<b>Discussion:</b>	<p>On December 10, 2014, the Board of Supervisors (BOS) approved Micro Market language in Chapter VIII of the MCEHC. Also, on this date the BOS took note of the Automatic Merchandizing Council's public request to go forward with the fee portion for Micro Markets.</p> <p>Currently applied Department Micro Market fees include the "All Other Food Establishments, Environmental Health Plan Review" fee (\$615.00) and the "Retail Food Establishment, Class 2, Food Environmental Health Operating Permits" fee (\$235.00).</p> <p>The Department is proposing reductions of current Micro Market Environmental Health fees pursuant to Arizona Revised Statute § 11-251.08 and County Policy that requires 100% cost recovery for provided services. Proposed fees include: Micro Market Operating Permit (\$155), Micro Market Reference Plan (\$270) and the Micro Market Permit Processing Fee (\$20).</p> <p>This proposed regulatory change is following the EROP policy and workflow process and fee changes are requested.</p> <p>In accordance with the Maricopa County Resolution, "Moratorium on Increased Regulatory Burdens," the County Manager authorized the Department to proceed with this case in July 2014.</p>
<b>Support/Opposition:</b>	<p>The Department has received one supporting comment and no opposing comments on the proposed changes.</p> <p>One stakeholder attended the March 26, 2015 stakeholder workshop and verbally stated her support and appreciation</p>

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with the Department for understanding her concerns and working with the industry to develop Micro Market regulations.

**Department  
Recommendation:**

Approve the request to process Case ES-2015-002 through the EROP Expedited Process.

Per the EROP Policy, Section IV(E), the Expedited Process may only be used if the following criteria have been met:

1. The proposed amendment has been subject to at least one stakeholder workshop (posted on the County's website at least two weeks in advance) and one Citizens' Board or Commission meeting;
2. A draft of the regulatory change was available on the EROP website at least two weeks prior to the Citizens' Board or Commission meeting and was forwarded to the Board/Commission at least one week in advance of their review meeting;
3. No comments of opposition to the amendment have been received from the public;
4. The Citizens' Board or Commission reviewing the amendment recommends approval.

ES-2015-002/Micro Market Fees has met the criteria for the Expedited Process:

1. One stakeholder workshop on March 26, 2015 was held and an announcement was posted on the County's website at least two weeks in advance;
2. A draft of the regulatory change was available on the EROP website at least two weeks prior to the Board of Health (BOH) meeting;
3. No comments of opposition to the MCEHC proposal have been received from the public;
4. The Department is requesting the BOH approve the proposal for the EROP Expedited Process.

**Regulatory  
Process:**

In accordance with the Maricopa County Resolution, "Moratorium on Increased Regulatory Burdens," the County Manager authorized the Department to proceed with this case in January 2015. Also, the County Manager briefed the BOS on the proposed changes in January 2015.

If the BOH approves this regulatory change it is anticipated the proposal will be on a BOS public hearing agenda in July 2015. This regulatory change will take immediate effect upon approval by the BOS.

**Presented by: Steven J. Goode, REHS., Director**

**Attachments:**

County Manager Case Approval (1 Page)  
Proposed MCEHC Revision Language (4 Pages)  
Presentation – Stakeholder Meeting (3/26/15) – (4 Pages)  
Minutes – Stakeholder Meeting (3/26/15) – (2 Pages)  
Stakeholder Input and Department Response(s) - (2 Pages)



**Maricopa County**  
Environmental Services Department



Environmental Services  
Department

Steven J. Goode, REHS, Director  
1001 N. Central Avenue #401  
Phoenix, Arizona 85004  
Phone: (602) 506-6654  
Fax (602) 506-5141  
TDD 602 372-0622

Date: January 5, 2015

To: Tom Manos, County Manager

Via: Joy Rich, AICP, Deputy County Manager

From: Steven J. Goode, REHS, Director

**Re: Case ES-2015-002/Micro Market Fees**

In accordance with the Maricopa County Resolution, "Moratorium on Increased Regulatory Burdens," the Environmental Services Department (Department) is seeking your approval to proceed with EROP ES-2015-002/Micro Market Fees. This proposal qualifies for the County Manager approval under the moratorium, as "To lessen or ease a regulatory burden." and "To comply with a federal statutory or regulatory requirement or a state statutory requirement."

On December 10, 2014, the Board of Supervisors (BOS) approved Micro Market language in Chapter VIII of the Maricopa County Environmental Health Code (MCEHC). Also, on this date the BOS took note of the Automatic Merchandizing Council's public request to go forward with the fee portion for Micro Markets.

The Department is proposing reductions of current Micro Market Environmental Health fees pursuant to Arizona Revised Statute § 11-251.08. Micro Market fees will be added into the MCEHC Chapter I fee schedule.

This proposal is following the EROP policy and workflow process and an existing fee would be utilized.

We are requesting your approval to move this proposed revision forward in accordance with the Maricopa County Resolution, "Moratorium on Increased Regulatory Burdens."

Approved by Tom Manos, County Manager

**MARICOPA COUNTY ENVIRONMENTAL HEALTH CODE**

**CHAPTER I**

**GENERAL PROVISIONS**

**REGULATION 1 to REGULATION 4** No Change

**REGULATION 5. Fees**

a. to c. No Change

d. Fee Schedule: Fees shall be paid according to the following table:

**CHAPTER I**

**MARICOPA COUNTY ENVIRONMENTAL HEALTH CODE – FEE SCHEDULE**

**Effective August 1, 2010**

**ENVIRONMENTAL HEALTH DIVISION**

<b>Food Environmental Health Operating Permits</b>	<b>Permit Subtype</b>	<b>1 Year Fee</b>
Adventure Food Service	No Change	No Change
Bakery	No Change	No Change
Bakery (School)	No Change	No Change
Boarding Home	No Change	No Change
Boarding Home	No Change	No Change
Bottled Water and Beverage Plants	No Change	No Change
Damaged Food	No Change	No Change
Daycare Foodservice	No Change	No Change
E&D 0-9 Seating	No Change	No Change
E&D 0-9 Seating	No Change	No Change
E&D 0-9 Seating	No Change	No Change
E&D 0-9 Seating	No Change	No Change
E&D Adult Daycare	No Change	No Change
E&D Assisted Living	No Change	No Change

<b>Food Environmental Health Operating Permits</b>	<b>Permit Subtype</b>	<b>1 Year Fee</b>
E&D Hospital Food Service	No Change	No Change
E&D Jail Food Service	No Change	No Change
E&D Nursing Home	No Change	No Change
E&D School Foodservice	No Change	No Change
E&D School Foodservice	No Change	No Change
E&D School Foodservice	No Change	No Change
E&D Senior Food Service	No Change	No Change
E&D Service Kitchen	No Change	No Change
E&D 10+ Seating	No Change	No Change
E&D 10+ Seating	No Change	No Change
E&D 10+ Seating	No Change	No Change
E&D 10+ Seating	No Change	No Change
Food Bank	No Change	No Change
Food Catering	No Change	No Change
School Food Catering	No Change	No Change
Food Jobber	No Change	No Change
Food Jobber School	No Change	No Change
Food Peddler	No Change	No Change
Food Production	No Change	No Change
Food Production	No Change	No Change
Food Production School	No Change	No Change
Food Production School	No Change	No Change
Ice Manufacturing	No Change	No Change
Itinerant (Temporary)	No Change	No Change
Itinerant (Temporary) Late Fee Application Received <7 Days Prior to Event	No Change	No Change
Meat Market	No Change	No Change
<b>MICRO MARKET</b>	<b>CLASS 1</b>	<b>\$155.00</b>

<b>Food Environmental Health Operating Permits</b>	<b>Permit Subtype</b>	<b>1 Year Fee</b>
Mobile Food Unit	No Change	No Change
Pushcart	No Change	No Change
Refrigerated Warehouse/Locker	No Change	No Change
Retail Food Establishment	No Change	No Change
Retail Food Establishment	No Change	No Change
Seasonal Food Establishment	No Change	No Change
Seasonal Permit Late Fee Application Received <7 Days Prior to Event		No Change
Vending Machines: 1-29 Units	No Change	No Change
Vending Machines: 30-59 Units	No Change	No Change
Vending Machines: 60-89 Units	No Change	No Change
Vending Machines: 90 Or More Units	No Change	No Change
Commissary	No Change	No Change
Commissary	No Change	No Change
Variance	No Change	No Change
Bare Hand Contact Exemption	No Change	No Change
Variance		No Change
Inspection upon Request	No Change	No Change
New Permit Application Inspection	No Change	No Change
HACCP Plans		No Change

<b>Non-Food Environmental Health Operating Permits</b>	No Change	No Change
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<b>Food Service Licensing</b>	No Change
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<b>Environmental Health Plan Review</b>	<b>Subtype</b>	<b>Fee</b>
Expedited Plan Review Fee (Requires prior administration approval) Two Times the fee for that Category		
Eating and Drinking Establishments	No Change	No Change
All Other Food Establishments		No Change
<b>MICRO MARKET REFERENCE PLAN</b>		<b>\$270.00</b>

Mobile Food Establishments		No Change
Mobile Pet Groomer/Shop		No Change

<b>Environmental Health Plan Review</b>	<b>Subtype</b>	<b>Fee</b>
Pet Shops		No Change
Public Accommodations		No Change
Pushcart Plan Review		No Change
School Facilities	Food Service	No Change
School Facilities	Non-Food	No Change
Other Minor Review		No Change
<b>MICRO MARKET PERMIT PROCESSING FEE</b>		<b>\$20.00</b>

**WATER & WASTE MANAGEMENT DIVISION** No Change

**REGULATION 6. to REGULATION 14.** No Change




## Initial Stakeholder Meeting

**Proposed Revisions  
Maricopa County Environmental Health Code**

**CASE # ES-2015-002  
Micro Market Fees**

Maricopa County Environmental Services Department  
March 26, 2015




## Maricopa County Environmental Services Department

**Working with our community  
to ensure a safe and healthy environment**

**VISION STATEMENT:**  
As the recognized regional environmental leader, we will develop and foster innovative environmental health protection programs for the safety of our residents and their environment.

**MISSION STATEMENT:**  
The mission of the Environmental Services Department is to provide safe food, water, waste disposal and vector borne disease reduction controls to the people of Maricopa County so that they may enjoy living in a healthy and safe community.




## EROP

**What is it?  
Where do I find it?  
How does it impact me?**

## EROP: What is it?

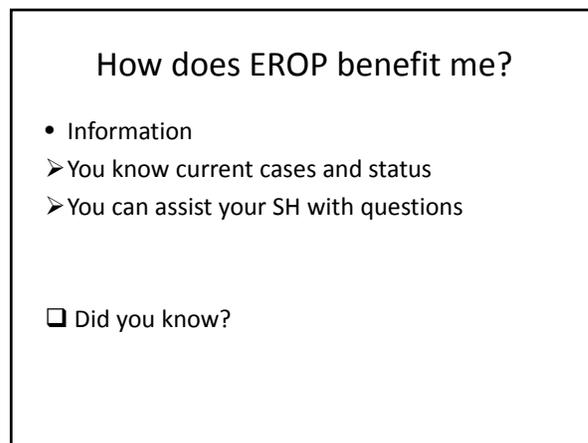
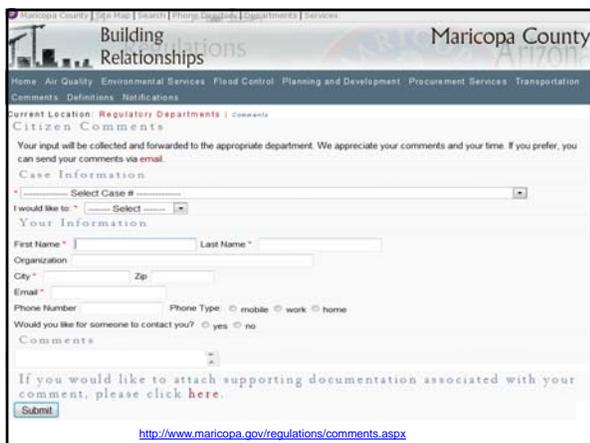
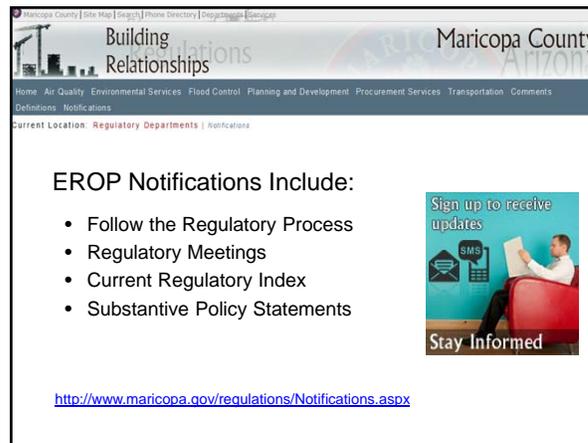
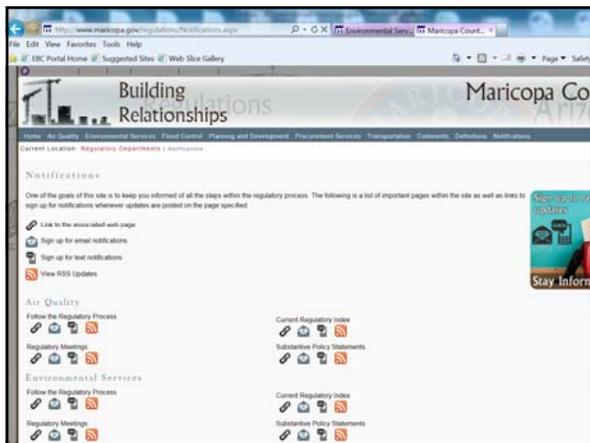
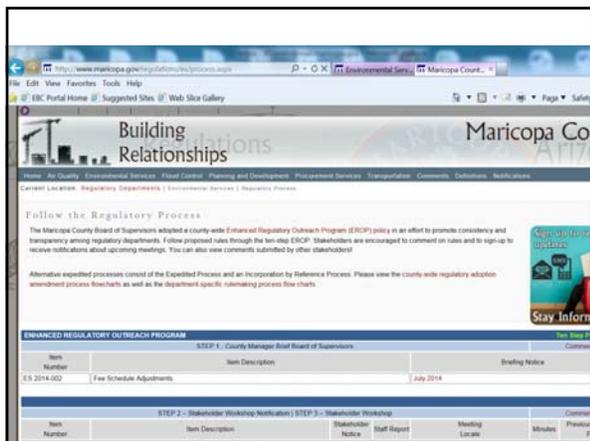
- Adopted by BOS in January 2013
- County Policy: Outreach # A1518
- Comprehensive process allows SH input
  - Adoption & amendment of all regulatory requirements
- Applicable to 6 Departments: ESD, AQ, P&D, Flood, Transportation, Procurement
- 2014 NACo Achievement Award

## EROP: Where do I find it?

- Accessible from the county main page <http://www.maricopa.gov/>
- Accessible from Department websites
- Look for




The screenshot shows the Maricopa County website with a focus on 'Building Relationships' and 'EROP Department'. It includes text about the Enhanced Regulatory Outreach Program (EROP) and the Air Quality Department's role in ensuring federal clean air standards are met.



**Micro Market Fees**

**Overview:**  
The proposed changes will add three fees specific to Micro Markets:

1. Micro Market Operating Permit (\$155)
2. Micro Market Reference Plan (\$270)
3. Micro Market Permit Processing Fee (\$20)

**Background**

"Micro Market" means an unattended retail food establishment where commercially prepackaged, time/temperature control for safety foods or ready-to-eat fruits and vegetables are offered for sale.

*Photo courtesy of Avanti Markets*

**Background**

Regulations specific to [Micro Markets](#) went into effect on December 10, 2014.

**REGULATION 6. Micro Markets**

1. A Micro Market shall be located where access can be limited to employees and customers of the business.
2. The area of a Micro Market in which food is displayed shall be located in a space of five hundred (500) square feet or less.
3. All Micro Market display units offering time temperature controlled for safety food shall have an automatic control that prevents the equipment from opening.
4. If there is a permit failure, automatic failure, or other condition that results in an unsafe or compromised temperature that causes customer food temperatures to be violated under Chapter 7 of the U.S. Food and Drug Administration 2013 Code of Federal Regulations:
  1. If a condition specified under subparagraph a. 1. of this regulation occurs, send the equipment to be repaired and returned with food that has been examined at temperatures specified under Chapter 7 of the U.S. Food and Drug Administration 2013 Code of Federal Regulations.
  2. If a condition specified under subparagraph a. 1. of this regulation occurs, send the equipment to be repaired, the automatic temperature unit not repaired or replaced. Marked for reuse than forty (40) minutes immediately after the display is closed, repaired, or replaced.
5. When the automatic control within a display described under paragraph a. of this regulation is repaired, the automatic temperature unit not repaired or replaced. Marked for reuse than forty (40) minutes immediately after the display is closed, repaired, or replaced.
6. Labeling requirements for prepackaged food items shall be met as required by the U.S. Food and Drug Administration 2013 Code of Federal Regulations.
7. Refrigerated ready-to-eat time temperature controlled for safety food, displayed at a Micro Market, shall be discarded if the automatic control is not activated as specified in a. 1. of this regulation.

**Background**

Current fees applied to Micro Markets:

1. Annual permit is required for each location.
  - \$235 for Retail Food Est. class 2 permit
2. Plan review and construction inspection is conducted for each location.
  - \$615 for All Other Food Ests. Plan Review

Total initial cost per location = \$850

**Background**

Environmental Services Department fees are set pursuant to [Arizona Revised Statute § 11-251.08](#) and County Policy that requires 100% cost recovery for provided services.

**Proposed fees**

Micro Market Permit and Fee:

- 1 year permit
- Class 1 permit; 1 routine inspection per year
- Permit is required for each Micro Market location
- Cost is \$155



**Proposed fees**

Micro Market Reference Plan:

- Reference plan may apply to multiple locations without further plan review approval.
- Deviation from the reference plan would require the owner apply and receive approval for the new plan.
- Cost is \$270



**Proposed fees**

Micro Market Permit Processing Fee:

- This fee is assessed when applying for a new permit under an approved Micro Market Reference Plan.
- Cost is \$20
- Total cost for initial permitting under an approved Micro Market Reference Plan is \$175 (\$155 permit fee + \$20 processing fee)



**Thank you for your participation!  
We welcome your questions  
and comments.**

<http://www.maricopa.gov/regulations/>

Ken Conklin, R.S., MPA, CPM  
Andrew Linton, R.S., CPM  
Maricopa County Environmental Services Department  
1001 N. Central Ave.  
Phoenix, AZ 85004



## Environmental Services Department



### Stakeholder Workshop ES-2015-002 Micro Market Fees Date: Thursday March 26, 2015

**Stakeholder Present:** Elaine Arena - Arizona Automatic Merchandising Council.

**Staff Present:** Andy Linton - Division Manager, David Morales - QA Supervisor, Joan Minichiello - Management Analyst, Bryan Hare - Environmental Services Managing Supervisor, Vas Hofer - Environmental Services Managing Supervisor and Vonda Canaan - Enforcement Supervisor.

**Presenters:** Ken Conklin and Andy Linton.

**Minutes\*:** Ken Conklin covered the Enhanced Regulatory Outreach Program (EROP) process and how stakeholders can stay informed on this and other upcoming cases. Also, Ken Conklin mentioned ES-2015-002 Micro Market Fees will be electronically posted for 60 days from the setting of the hearing to the hearing date and if it continues on the EROP expedited track (without opposition) this case should be on the July 22, 2015 Board of Supervisors agenda for public hearing and possible approval.

Andy Linton explained differences between the three Micro Market fees: Micro Market Operating Permit (\$155), Micro Market Reference Plan (\$270) and the Micro Market Permit Processing Fee (\$20). He also stated what is meant by Micro Market and that Micro Markets will be inspected once a year as a class 1 permit.

[Micro Market](#) regulations became effective on December 10, 2014. A Micro Market is an unattended retail food establishment where commercially prepackaged, time/temperature control for safety foods or ready-to-eat fruits and vegetables are offered for sale.

Under the current fee structure, the total startup cost for a Micro Market is \$850.00 per location. This includes a cost of \$235 for a Retail Food Establishment Class 2 permit and \$615 for plan review. The vending industry requested new fees be developed that are specific to Micro Markets and more accurately reflect service costs.

Andy explained that Department services are provided at 100% cost recovery; meaning the Department must recover the cost for services provided. The Department looked at risks associated with Micro Markets and determined a once a year inspection as class 1 permit is appropriate due to the use of packaged foods and specific controls. To determine the annual Micro Market fee benchmarking cost comparisons with other jurisdictions and an historical analysis of Department inspection time was utilized. The annual Micro Market Operating Permit (\$155) fee would be required for each Micro Market location. Also, a Reference Plan Review (\$270) is required. When approved, the owner can use the same Reference Plan for multiple locations provided the same type of set-up and equipment is used. The Department also determined when one applies for a Micro Market Permit using an approved

Reference Plan; a Micro Market Permit Processing Fee (\$20) would be applied to cover the application review and data input.

Elaine Arena stated her appreciation with the Department for understanding her concerns and for working to develop Micro Market regulations.

**Meeting adjourned.**

\*In order for the minutes to be relevant; only those questions and comments that were applicable to the topic presented were recorded. All other questions and comments not relevant to the topic were addressed either at the time of the meeting or shortly thereafter.

**From:** [Lene Pope - ENVX](#) on behalf of [EROP Stakeholders](#)  
**To:** [eharena51@gmail.com](mailto:eharena51@gmail.com)  
**Subject:** Response/case ES-2015-002 - Revisions to Maricopa County Environmental Health Code - Chapter I, Micro Market Fees  
**Date:** Wednesday, March 25, 2015 8:52:29 AM  
**Attachments:** [image001.png](#)

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Dear Elaine Arena:

Thank you for registering your support regarding Maricopa County Enhanced Regulatory Outreach Program (EROP) case ES-2015-002 – Micro Market Fees via the EROP website.

We appreciate your participation in the Maricopa County Environmental Services Department's efforts to develop regulations that serve our community and ensure a safe and healthy environment.

### **Environmental Health Division**

Maricopa County Environmental Services Department  
1001 N. Central Avenue, Phoenix, AZ 85004  
[esd.maricopa.gov](http://esd.maricopa.gov) | [maricopa.gov/regulations/es](http://maricopa.gov/regulations/es)



Working with our community  
to ensure a safe and healthy environment



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**From:** [ehrena51@gmail.com](mailto:ehrena51@gmail.com)[SMTP:EHRENA51@GMAIL.COM]  
**Sent:** Tuesday, March 24, 2015 4:14:41 PM  
**To:** Regulatory  
**Subject:** Regulatory Outreach  
**Auto forwarded by a Rule**

### **Citizen Comments**

**Issue:** ES-2015-002 – Micro Market Fees

Citizen's Name: Elaine Arena  
Organization: Arizona Automatic Merchandising Council  
City: Scottsdale  
Zip: 85260  
Phone Number: 602 228 2980  
Phone Type: mobile  
Email: [ehrena51@gmail.com](mailto:ehrena51@gmail.com)

Does citizen want to be contacted:

Comment is regarding: express support

### **Comments:**

March 24, 2015 The Arizona Automatic Merchandising Council (AAMC) thanks the Board of Supervisors and staff for moving forward to implement the fee schedule for the new Micro Market

classification. We appreciate the staff's work to develop recommended fees for a Micro Market reference plan in the amount of \$270, and an annual operating permit of \$150. The AAMC believes the fees as proposed in the attachment to the Notice of Stakeholder Workshop are reasonable. We will have a representative at the Stakeholder meeting on March 26th and the Board of Health meeting on April 27th. Respectfully submitted, Elaine Arena on behalf of the Arizona Automatic Merchandising Council

Time of Request: 3/24/2015 4:14:41 PM



## Report to the Board of Supervisors ADDENDUM

Prepared by the Maricopa County Environmental Services Department



Environmental Services  
Department

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**Meeting Date:** July 22, 2015

Stakeholder comments received after the April 27, 2015 Report to the BOH were transmitted are attached.

**From:** [Lene Pope - ENVX](#)  
**To:** [Lene Pope - ENVX](#)  
**Subject:** FW: Micro Market Fee Schedule  
**Date:** Wednesday, May 06, 2015 9:01:45 AM

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**From:** Elaine Arena <[eharena51@gmail.com](mailto:eharena51@gmail.com)>  
**Subject:** **Micro Market Fee Schedule**  
**Date:** April 30, 2015 at 3:28:28 PM MST  
**To:** [akunasek@mail.maricopa.gov](mailto:akunasek@mail.maricopa.gov)  
**Cc:** [ktyne@mail.maricopa.gov](mailto:ktyne@mail.maricopa.gov), Steven Goode - ENVX  
<[SGoode@mail.maricopa.gov](mailto:SGoode@mail.maricopa.gov)>

Supervisor Kunasek:

Thank you for taking the time to talk with me about Micro Market regulation and the associated fee schedule. The Arizona Automatic Merchandising Council appreciates the staff work involved in drafting the regulation and performing the fee analysis in a timely and professional manner.

As I mentioned at the Board of Health meeting on April 27th the regulatory structure was adopted by the Board of Supervisors in December. The Board honored our request to move forward with the fee schedule through the expedited process. I believe the new fee schedule will go before the Board of Supervisors at the end of July.

The Arizona Automatic Merchandising Council respectfully requests that the fees be made effective retroactive to the date the regulations were adopted. I understand there have been approximately six micro markets permitted between December 10, 2014 and the present. There may be some more in the pipeline.

While it may not be a substantial amount in the big picture it does have a significant impact on the vendor and seems a reasonable request. Please let me know what we can do to make this happen.

Thank you in advance for your attention to this matter.

Best regards,

**Elaine Arena**

Arena Government Communications, Inc.  
Mobile 602 228 2980

This communication may contain confidential and/or proprietary information and may not be disclosed to anyone other than the intended addressee. Any other disclosure is strictly prohibited by law. If you are not the intended addressee, you have received this communication in error. Please notify the sender immediately and destroy the communication including all content and any attachments. Thank you.