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1985

Direction de
la vérification,
de l'évaluation
et du contrôle

Audit,
Evaluation and
Control Branch

WORK PLAN FOR THE
PHASE-OUT OF MCC

FINAL REPORT



Consommation
et Corporations
Canada

Consumer and
Corporate Affairs
Canada



Consommation
et Corporations Canada

Consumer and
Corporate Affairs Canada

Bureau de la
Coordination des politiques

Bureau of
Policy Co-ordination

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March 31, 1983



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MAIN

L'ELIMINATION PROGRESSIVE DE LA
COMMISSION DU SYSTEME METRIQUE

Le Conseil du Trésor a ordonné une évaluation des activités de la Commission du système métrique et l'exécution d'un plan de travail pour l'élimination progressive de cette dernière. Par suite des vastes consultations qui ont eu lieu durant l'étude avec les parties intéressées, on en est arrivé à la conclusion que la conversion avait atteint une bonne vitesse de croisière et que les bases établies suffiraient à assurer le succès de la conversion au système métrique au Canada. L'étude fait mention de tâches dont doit s'acquitter la Commission d'ici au 31 mars 1985 et indique que cette dernière peut être éliminée progressivement pour cette date sans que le rythme de la conversion au cours des années subséquentes en soit compromis.

En résumé, le rapport propose ce qui suit:

1. La CSMC doit avoir pour objectif de servir de catalyseur afin de faciliter la conversion au système métrique dans les principaux secteurs de l'économie jusqu'au point où la vitesse de croisière sera suffisante pour assurer l'adoption du système de mesures métrique au Canada.
2. Pendant la période d'élimination progressif, la CSMC doit concentrer ses efforts sur trois domaines prioritaires:
 - i) encourager la conversion au système métrique au sein de l'Administration fédérale;
 - ii) mettre en oeuvre un programme modeste de sensibilisation du public, en tenant compte des besoins particuliers des diverses régions du Canada et des différents éléments du public canadien;

THE PHASE-OUT OF METRIC COMMISSION
CANADA

Treasury Board directed that a comprehensive evaluation of the MCC's activities be undertaken and a work plan for the phase-out of MCC be prepared. As a result of extensive consultations with all affected parties carried out during the study, it was found that there is significant momentum for conversion and that the foundation has been laid for the successful completion of the conversion to metric in Canada. The study, identified the program tasks to be carried out by MCC up to March 31, 1985 and found that MCC can be phased-out by March 31, 1985 without affecting the pace of the conversion process in the following years.

In summary, the report recommended the following:

1. The MCC objective should be to serve as a catalyst to facilitate metric conversion in major economic sectors to the point that there is sufficient momentum to ensure the adoption in Canada of the metric system of measurement.
2. MCC should concentrate its efforts over the phase-out period in three priority areas:
 - (i) encourage conversion to metric in the federal government;
 - (ii) conduct a low-key public awareness program, responsive to the specific needs of the various regions of Canada and segments of the Canadian public;

iii) continuer à prêter efficacement l'aide nécessaire aux comités sectoriels et aux groupes de travail.

3. La Commission du système métrique Canada doit faire l'objet d'une élimination progressif et continue se terminant le 31 mars 1985.

4. La prestation des besoins du programme après le 31 mars 1985 sera assurée par le biais de la décentralisation de certaines activités qui relèvent actuellement de la Commission, ainsi que la création d'un bureau du système métrique de moindre envergure au sein de Consommation et Corporations Canada.

(iii) continue required and effective assistance to the sector committees and working groups.

3. Metric Commission Canada should be phased out by March 31, 1985 in a gradual and steady manner.

4. Provision for program requirements after March 31, 1985 will be made through the decentralization of some of the activities now covered by Metric Commission Canada and through the establishment of a small Metric Office within CCAC.

CONTENTS

Final Report

	<u>Page</u>
1. Key Findings	1
2. Recommendations	1
2.1 MCC Phase-Out	1
2.2 MCC Commissioners	2
2.3 Priority Areas	2
2.4 MCC Resource Requirements	5
2.5 Program Requirements After MCC is Closed	5
2.6 Implementation	7
2.7 Continued Reporting	7
2.8 Contingencies	8
3. Background	9
3.1 Study Plan	9
3.2 Multiple Lines of Evidence	10
Table I - Summary of Study Modules	12
4. Study Findings	13
Table 2 - Summary of Key Study Findings	13
4.1 Objectives Clarified	16
4.2 Momentum Assessed	16
4.3 Phase-Out Options	18
4.4 Priority Areas	20
4.4.1 Conversion Within the Federal Government	20
4.4.2 Public Awareness	21
4.4.3 Assistance to Sector Committees	23

	Page
4.4.4 Measurement-Sensitive Clauses in Legislation	25
5. Organization During Phase-Out	27
Table 3 - Metric Commission Organization	27
6. Aggregate Resource Requirements	29
Table 4 - Summary : MCC Resource Requirements	30
7. Program Requirements After March 1985	31
Table 5 - Activities Which Will Continue After MCC Phase-Out	32
7.1 Metric Office	33
7.2 Standards Council	34
7.3 Treasury Board Secretariat	34
7.4 Department of Justice	34
7.5 Other Federal Departments	34
Appendix 1 Forecast of Sector Committees Expected to Stand Down	36
Appendix 2 Sectors Constrained by Conversion in U.S.	40
Appendix 3 Organization Charts	42
Appendix 4 Resource Estimates	51

1. KEY FINDINGS

This study involved extensive consultations with a broad cross-section of individuals who have been associated with the conversion program and the Metric Commission Canada (MCC). Based on the results of these consultations, and considering the experiences of other countries which have converted to metric, the study found that as a result of the work of MCC over the years, and the efforts and accomplishments of the provinces, industry and the public, there is significant momentum for conversion and the foundation has been laid for successful completion of the conversion to metric in Canada. Conversion is seen as a gradual process which will take 30 to 50 years to complete.

By and large, MCC has successfully carried out a most difficult task, although there are still some activities to be completed. MCC's workload will decline substantially in a gradual and steady manner over the next eighteen to twenty months to a much reduced level, after which the decline in workload will be more gradual. Federal government activities which must be continued in support of the conversion program after March, 1985 can be undertaken by CCAC and other departments and agencies.

2. RECOMMENDATIONS

2.1 MCC Phase-Out

Having regard to the factors affecting the rate of conversion in Canada, the role of MCC, the program accomplishments to date, the program activities remaining to be done, and the advantages and disadvantages of the various options for carrying out these activities, the study team recommends phasing-out MCC in a gradual and steady manner and closing MCC on March 31, 1985.

2.2 MCC Commissioners

As the workload of MCC decreases over the period to March 31, 1985, either the number of Commissioners should be allowed to decline as their terms expire or the frequency of meetings of the full Commission should be reduced, with more frequent meetings being held by an executive committee of the Commission. No new Commissioners should be named to MCC.

2.3 Priority Areas

MCC should concentrate its efforts over the phase-out period in three priority areas:

- (1) Encourage and assist conversion to metric in the federal government;
- (2) Conduct a low-key public awareness program, responsive to the specific needs of the various regions of Canada and segments of the Canadian public;
- (3) Continue required and effective assistance to the sector committees and working groups.

2.3.1 Federal Government

2.3.1.1 Treasury Board Directive

MCC should work with all interested parties to obtain a Treasury Board directive to support the conversion to metric and the use of metric for all internal and external communications throughout the federal government, including all departments, agencies and Crown corporations.

2.3.1.2 Training for Public Servants

Public servants that must use S.I. in the performance of their duties should receive appropriate training to do so. Over the phase-out period, MCC should assist trainers from the Public Service Commission or from CCAC or private sector consultants as required, in developing an S.I. training program for public servants.

2.3.2 Public Awareness

2.3.2.1 Private Sector Firms

Private sector public relations firms, closely managed by MCC, are viable to carry out the primary public awareness tasks over the phase-out period.

2.3.2.2 Federal-Provincial Agreements

Agreements with the provinces should generally not be renewed after March 1984, save by exception, and in any case, should terminate in March 1985.

2.3.2.3 Paid Advertising

The use of paid advertising should be considered on a case-by-case basis in the future. All communications ads and documents should be tested for usefulness prior to production; target groups should be carefully defined, and impact should be assessed. Production of communication tools should be contracted to private sector firms. Production of pamphlets was found to be the most useful of the various current MCC public awareness activities.

2.3.3 Sector Committee Support

In general, remaining sector committees require different levels and types of support from MCC over the phase-out period. Support for sector committees which speeds up and assists the conversion process should be provided to those sector committees where it is expected to be effective. Some sectors, while they may require additional help at some future time, do not require continued support from MCC over the phase-out period.

Conversion of these sectors may be dependent on market conditions or on standards or other factors in the U.S. or internationally, and these are outside the control of MCC. Responsibility for the conversion of these sectors should be transferred to the appropriate departments during the phase-out period. For these sectors, it should be a decision of the sector committee to decide whether another, ongoing industry committee, association or agency should take over for the sector committee, or whether the sector committee itself should continue.

In all cases, sector committees should be informed of the approved phase-out plan for MCC, including the approved close-down date, and be advised that after that date, no resources will be provided to that committee to support its activities. This may cause some telescoping of resource requirements in eight to twelve sectors so that they can complete their work during the phase-out period; additional resources have been recommended in the phase-out plan for MCC to accommodate this acceleration of work over the phase-out period.

2.4 MCC Resource Requirements

MCC is expected to require 76 person-years for fiscal year 1983-84, and a total budget of \$7.29 million, comprising \$2.87 million for salaries and benefits and \$4.42 million for operating costs. It is therefore expected that MCC will not require any resources in FY 1983-84 in addition to those estimated in the FY 1983-84 Main Estimates.

MCC should be provided 40 person-years for fiscal year 1984-85. Total budget for 1984-85 is estimated at \$4.06 million, including \$1.66 million in salaries and benefits and \$2.40 million in operating costs.

These figures exclude resources required for the Workers' Metric Tools Assistance Program, estimated at \$492,000 operating costs and \$11 million in contributions in 1983-84, and \$147,000 operating costs in 1984-85. Contributions in FY 1984-85 are expected to be \$6.5 million.

2.5 Program Requirements After MCC is Closed

Recommendations related to the period after the recommended MCC close-out on March 31, 1985 are tentative in nature. They relate to both specific and general, short term and ongoing activities and requirements which will be carried on by other organizations after MCC is closed. Analysis and consultations needed to define the precise details and to make the actual arrangements should be undertaken by MCC management and officials of the organizations concerned (including the Central Agencies) during calendar year 1984. More detailed resource estimates, both financial and human, should be presented by affected parties in the 1984-85 MYOP, to be completed in March, 1984.

(a) Ongoing responsibilities for providing assistance and advice and generally monitoring progress of the federal government, legislative amendments, and the conversion process should be transferred to a Metric Office within CCAC, perhaps within the Bureau of Consumer Affairs. The human resource implications of this Office are estimated at about 6 person-years in 1985-86, declining to 4 person-years over a two-year period. Expected operating costs should be assessed and included in next year's MYOP.

(b) Responsibilities for specific sectors which may require assistance in the future would be transferred to the relevant federal department. For example, conversion in the livestock sector would come under Agriculture Canada; in the air or rail transport sectors under Transport Canada; other industrial sectors, under Industry, Trade and Commerce. No resources are expected to be required for these departments in addition to those that they have traditionally allocated to the metric conversion program.

(c) Any ongoing communications and public awareness activities will be undertaken for the Metric Office by the Communications Branch, Bureau of Policy Co-ordination, CCAC. Staff in the regional and district offices of CCAC will continue to respond to public enquiries and complaints regarding metric conversion. No additional person-years are required in the regions, although an estimated 3 person-years will be needed at headquarters for a three-year period. Expected operating costs should be prepared for inclusion in next year's MYOP.

(d) General policy matters and research needs related to the metric conversion program should become the responsibility of the Policy Research, Analysis and Liaison Branch, Bureau of Policy Co-ordination, CCAC. Any additional resource requirements related to work expected to be undertaken for the conversion program should be reflected in next year's MYOP.

(e) Monitoring compliance with any TB directives related to metric conversion should rest with TBS.

(f) Reviewing proposed amendments to legislation and regulations with measurement-sensitive clauses to ensure that they conform with government policy on metric usage should be the responsibility of the Legislative Programming Branch, Department of Justice.

2.6 Implementation

It is the responsibility of MCC to implement the approved phase-out plan and approved recommendations resulting from this study. The Special Studies Directorate of MCC should be charged with the responsibility of continuous monitoring of the implementation of this plan and reporting thereon to MCC management.

2.7 Continued Reporting

Regarding the implementation of the approved phase-out plan, as provided by departmental policy, the Bureau of Policy Co-ordination will review progress reports prepared by MCC and provide advice quarterly to the Deputy Minister over the phase-out period.

2.8 Contingencies

This plan sets an overall plan and guide for the phase-out period. It has built in the capacity to absorb a limited number of major new challenges which could possibly arise in specific sectors over the phase-out period without additional financial or human resource requirements. MCC management is left a high degree of latitude in reallocating financial and human resources between priority areas to respond to changes in the program environment, if and when they occur.

Specifically, in preparing these estimates, a number of contingencies have been accommodated and taken into account. In particular resources have been targeted to provide additional program support in the retail food sector, if this becomes necessary on the expiry of the Retail Scales Information Program; in the construction sector due to the uncertainties related to reorganization of the sector and steering committees to provide better support where it is most required; and in the three sectors which could be affected by court challenges to regulations which have been passed.

3. BACKGROUND

3.1 Study Plan

In August, 1981, the Treasury Board directed the Department of Industry, Trade and Commerce to undertake, in consultation with officials from the Office of the Comptroller General and the Treasury Board Secretariat, a comprehensive study to identify the person-year requirements of MCC, and to develop a person-year management plan for the orderly phasing-out of MCC (TB 778396). As a result of the reorganization of the Department of Industry, Trade and Commerce, in January, 1982, MCC came under the responsibility of the Minister of Consumer and Corporate Affairs, and as such, this Department has carried out the TB directive.

A plan for carrying out this study was prepared during the Spring and Summer of 1982 and terms of reference for the study were approved by the Deputy Minister in August, 1982.

The study was divided into three phases:

Phase I: - Objectives assessment and clarification

Phase II: - Assessment of achievements to date leading to a definition of program priorities and remaining tasks

Phase III: - Preparation of action plans to ensure that the program tasks can be carried out
- Preparation of a phase-out plan for MCC
- Preparation of final report and recommendations

Phase I was carried out in September and October 1982; Phase II began in October and was completed in January, 1983; Phase III began in December 1982 and was completed in

March, 1983. Each phase of the study was designed to address a specific set of issues on which the evidence provided needed direction for the following phases. The Deputy Minister was briefed at the end of each phase of the study and reports were prepared outlining the key findings of each phase.

3.2 Multiple Lines of Evidence

Six consulting firms, working independently assisted the study team to carry out the various study modules. Extensive consultations were undertaken with government officials at the federal, provincial and municipal levels, officials of foreign governments involved in metric conversion, business executives in Canada and the U.S., sector committee members and program personnel. Case studies were undertaken in five important sectors¹ and these included consultation both with sector committee members, and industry outside the sector committees. An analysis of measurement-sensitive clauses in legislation which may inhibit or prohibit conversion was undertaken as a separate module. In order to assess the communications/marketing activities required to support the program, a study was undertaken which included consulting with communications and advertising experts in Montreal and Toronto.

The study was designed in a way that used several different perspectives and information sources to examine the issues. No single method of data collection or analysis used was expected to provide conclusive evidence. Using

1. Petroleum and Natural Gas Industry and Services, Motor Vehicle Parts Manufactures, Primary Iron and Steel Mills and Foundries, Livestock and Construction.

multiple lines of information allowed for validation and cross-checking of findings. The evidence produced during the course of this study is considered to be a valid and reliable basis for decision-making related to a phase-out plan for MCC.

The table below summarizes the work undertaken. Each of the consultants produced a separate report on his study module. During the course of the study all consultants' reports and recommendations were provided to and discussed with MCC management and the members of an Advisory Committee which included members from MCC, the Office of the Comptroller General, Treasury Board Secretariat and CCAC. Thus information and advice produced by the study team were available to MCC, CCAC and the Central Agencies for use in ongoing planning and decision-making.

TABLE I - SUMMARY OF STUDY MODULES

Module	Persons Consulted
Literature review - by RES Policy Research (Ottawa)	Review of literature and documents, telephone interviews with 23 senior officials from six countries and the EEC.
Discussions - by CPER Management Consulting (Ottawa)	69 interviews with Commissioners and former Commissioners, senior MCC staff, federal Interdepartmental Committee on Metric Conversion (ICMC), Intergovernmental Metric Conversion Committee (IMCC), Working Group on Metric Export/Import Trade and members of 16 sector committees; review of MCC files.
Consultations - by Angus Reid and Associates (Winnipeg)	381 telephone interviews with sector committee members, 333 from 44 non-converted sectors, 48 from 10 converted sectors.
Case Studies - by Canada Market Research (Toronto)	128 interviews with sector committee members and non-members from 5 sectors. Review of MCC files and documents related to these sectors.
Communications - by Multi-Reso Ltd. (Montreal) with the collaboration of Decima Research (Toronto)	17 interviews; analysis of survey results since 1976; analysis of press clippings and business periodicals; assessment of results of Discussions, Case Studies and Consultations. Two focus group discussions with communication/marketing experts in Toronto and Montreal.
Legislative Requirements - by Peat Marwick and Partners (Ottawa)	Assessment of information obtained from reports on Discussions, Case Studies, and Consultations; interviews with six municipalities and MCC staff; literature review; review of legal documents.
Organizational Analysis - by Peat Marwick and Partners (Ottawa)	Assessment of evidence of all other modules. Interviews with MCC staff and staff of a number of federal government departments.

4. STUDY FINDINGS

Table 2 below summarizes the key findings to date in the study. The text which follows the table provides further amplification.

TABLE II - SUMMARY OF KEY STUDY FINDINGS

Issues	Finding	Comments
1. Objectives Clarification	MCC Main Estimates objective should be changed to reflect role of MCC as facilitator of conversion.	Study finding will be reflected in Operational Plan Framework submission to Treasury Board (This document will be submitted during fiscal year 1982-83).
2. Momentum for Conversion	Foundation has been laid for successful completion of conversion to metric in Canada; there is significant momentum for conversion. Conversion seen as gradual process that will take 30 to 50 years.	Major constraints to more rapid conversion are economic conditions, and U.S. conversion. These are outside the direct control of MCC. More frequent and visible actions from government would enhance the rate of conversion in many sectors.
3. Phase-out Options	Immediate close-down possible but would have negative impact and could be misinterpreted as lack of federal government commitment.	Study team recommends against immediate close-down of MCC. Close-down in March, 1985 is the recommended option. Phase out over this period will allow

TABLE II - SUMMARY OF KEY STUDY FINDINGS (cont'd)

Issues	Finding	Comments
		MCC to carry out important activities which are expected to effectively assist/accelerate the achievement of program objectives.
		In view of substantially reduced workload after March 1985, phase-out after this date appears to have only marginal benefits compared to costs.
4. Priority Areas	Three priority areas identified where MCC can be effective for a one or two year period:	
	a) conversion of federal government organizations	TB directive should be issued to support program.
	b) public awareness	Low-key program, responsive rather than proactive Targeted to specific needs of the Canadian public and the different regions.
	c) sector committee assistance	MCC resources to be focussed to most effective support and facilitating activities

TABLE II - SUMMARY OF KEY STUDY FINDINGS (cont'd)

Issues	Finding	Comments
	Workload will decline in a gradual and steady manner with a small on-going resource requirement after March 1985.	Phase III will identify specific resource/results and timeframe linkages and estimate ongoing resource requirements for program after MCC phase-out.
5. Legislation	<p>Amendment of regulations is proceeding as an on-going process;</p> <p>No legislation prohibits metric conversion; however legislative tools could be used to enhance and facilitate conversion in some sectors.</p> <p>Forty seven federal statutes remain to be amended.</p>	<p>Proceeding with Omnibus Bill at this time is unnecessary and would be unwise due to possible negative political impact.</p> <p>A legislative amendment program, responsive to industry needs and which, through monitoring, minimizes difficulties to industry should be maintained by MCC and after close-out by other government departments.</p>

4.1 Objectives Clarified

Phase I of the study found that MCC's stated objectives required modification to reflect the MCC's role as a catalyst and a facilitator of conversion. In this regard the study team recommends the following MCC objective:

"to serve as a catalyst to facilitate metric conversion in major economic sectors to the point that there is sufficient momentum to ensure the adoption in Canada of the metric system of measurement (S.I.)."

MCC management and the Deputy Minister have indicated their support for this modified objective.

4.2 Momentum Assessed

In order to assess momentum for conversion, after a thorough literature review, the study team contacted sector committee members, government officials and industry representatives outside the MCC sector committee structure. Work undertaken by MCC on this dimension of the program was carefully reviewed. No single measure was found to be an appropriate indicator or basis for broad generalization and the provision of a single percentage conversion complete figure for the country as a whole was not found to be meaningful. However, as appropriate in specific sectors, the study team looked at the use of metric measurement in the workplace and at the retail level, the percentage of orders placed in metric units, and the percentage of end products defined or described in metric units; the team considered industry and public attitudes towards and knowledge of the metric system as well as the work accomplished by MCC and the sector committees and industry associations. Based on this evidence, and having

regard to the experiences of other countries, to the major challenges of changing the system of measurement used in normal practice in Canada, and to the major steps in planning and implementing conversion, the study has found that there is significant overall momentum for conversion in Canada. In some specific sectors, however, momentum for conversion is lacking, and measures will be taken by MCC over the phase-out period to build momentum in these sectors.

The work carried out in the program since 1970 has laid the foundation and ensured that significant steps towards full conversion have been taken in many sectors of the economy. An important number of sectors are converted and a significant portion of end products are measured in metric units in many sectors. In addition, conversion of the education sector, and the provision of referents to Canadians such as weather forecasts, distance markings on highways and roads, speed limits, automobile speedometers, conversion of the retail food scales, and the automotive and petroleum retail sectors will, over time, result in increased familiarity with and knowledge of S.I. units and facilitate a higher level of metric usage in Canada. The major factors that are holding back conversion in many sectors include: economic conditions and the pace of conversion in the U.S. Every study module found that more frequent and visible actions from the various levels of government would enhance the rate of conversion in many sectors.

Bringing about an economy where metric measurement is the normal practice is seen as a gradual process of societal change which, while well underway, will not be completed before 30 to 50 years. Over this period, dual measurement systems will continue to be used in many sectors. A key factor that contributes to the inertia is that much of the benefits of conversion are obtained in the long term only; there are often no short-term economic or other incentives to convert in many sectors, yet there are usually perceived and/or real

costs and inconveniences that must be borne. The conclusion to be drawn is that unless a carrot-and-stick approach is adopted to alter the pace of conversion or to increase incentives for conversion or disincentives for non-conversion in some sectors, a relatively high level of uncertainty will remain for some time as to the ultimate date of conversion in these sectors.

The position of the U.S. in respect to conversion to metric is a major obstacle to more rapid and complete conversion in many sectors in Canada. The study has found that, using the MCC sector breakdown, 19 Canadian sectors (out of 104) are constrained by conversion in the U.S. (these sectors are listed in Appendix 2). Conversion in many other Canadian sectors would be enhanced by U.S. conversion.

Current U.S. policy on metric is to let market forces alone drive conversion. In some sectors this approach has worked quite well, and several important U.S. sectors have converted or are in the process of converting. However, in spite of the progress of conversion in some sectors, and in some parts of the U.S., the U.S. federal government does not provide leadership or commitment in planning, co-ordinating or scheduling conversion in its own departments, and there appears to be a solid resistance to using metric in many sectors and states. It is also worth noting that while about half the states have introduced metric instruction in the education system, there is no national coordination of the changeover to metric in the field of education.

4.3 Phase-Out Options

Based on the extensive consultation that has been undertaken, the study team concludes that much has been accomplished by the MCC and most of the work to facilitate conversion in the sectors, including planning and coordinating, has now been

successfully completed using the sector committee approach. The evidence suggests, that while most of its work is done and, thus, while its continued existence is not absolutely essential to the success of the program, there could be a significant negative impact if the MCC were closed immediately. Such an abrupt closure of MCC could be misinterpreted as a reduction of the federal government's commitment to the program, and could have adverse effects on sectors which have recently converted. Also, some important sector work, and programs such as the Workers' Metric Tools Assistance Program, the Retail Scales Information Program and the federal-provincial agreements, as well as work to address the identified needs of some parts of the public would still have to be carried out by CCAC and/or other agencies of government.

The evidence suggests therefore, that any reduction in activity and/or resource levels in MCC should be phased, and that there are major activity areas that should continue to be carried out by the MCC, at least until March 1984, and preferably, until March, 1985. The workload is expected to diminish gradually over the period 1983 through 1984. After March 1985, there will be a substantially reduced workload for MCC since:

- 1) most sector committees where MCC can offer effective assistance are expected to have stood down by that date;
- 2) a significant number of sectors will use S.I. predominantly;
- 3) the majority of sectors will have converted as far as possible and further government assistance of the type provided by MCC will not significantly increase momentum for conversion; and

- 4) all sectors constrained by conversion in the U.S. will have progressed as far as possible, with further use of S.I. in these sectors largely dependent on U.S. conversion.

The phase-out plan for MCC presented in this report is based on a phase-out over the period to March 31, 1985. After that date, remaining program activities would be transferred to other appropriate government departments and agencies and a small Metric Office, located within CCAC.

4.4 Priority Areas

From the evidence of the various study modules, three key areas that should be addressed by MCC in the period until the close-down date are apparent. These are:

- 1) conversion within the federal government;
- 2) public awareness and communications; and
- 3) continued assistance to sector committees and sectors as required.

4.4.1 Conversion Within the Federal Government

One of the issues which was looked at in the study relates to the process of conversion within the federal government. Results support a recommendation to seek the issuance of a Treasury Board Directive to all departments and agencies, including federal Crown corporations, respecting metric conversion. This is the best of the various options available to have the federal government complete, as quickly as possible, the conversion of all its internal and external communications and transactions with other sectors, such as announcements, publications, procurement and advertising. This will require further detailed work by MCC over the phase-out period to ensure that any directive will be practical and geared to the conversion efforts of industry and the public.

The phase-out plan which has been prepared for MCC makes provisions for required training and assistance to achieve these aspects of conversion within the federal government. The evidence indicates that while members of the Interdepartmental Committee on Metric Conversion (ICMC) should be contacted as part of the consultative process for the issuance of the directive, it is unlikely that the reconstitution of ICMC, even at a more senior level, would be as effective as the issuance of a TB directive, and the adoption of effective conversion management within each federal department and agency.

4.4.2 Public Awareness

The evidence suggests that the current resources used in the MCC information programs can be re-aligned to provide help where it is most required, at the lowest cost, and in the most effective manner. Target groups were identified by the study. Also, the advantages and disadvantages of the various strategies that could be adopted were considered. The study team has concluded that a low-key program rather than a high profile advocacy campaign is most appropriate (in terms of the general public). A program that is reactive to public demands rather than proactive is indicated. The program should reflect the needs of specific target groups and regions of Canada. Also, as much as possible, an information program should be delivered by the private sector rather than the public sector.

The joint government-industry-public initiatives that have taken place over the course of this program must be further emphasized to correct current public impressions that this is strictly a federal government program.

The principal communication activities to be undertaken during the phase-out period, and for which there will be a continuing requirement, although at a substantially reduced

level after phase-out, include responding to public enquiries; responding to questions from the media and to inaccurate reports or information in the media; and producing and assisting industry to produce (through private sector contracts) new pamphlets as requested by sector committees (subject to proper controls on the identification of a precise target group, and after testing acceptance and usefulness). There is evidence that these functions could be economically and effectively provided during the phase-out period by private sector public relations firms, under close management by MCC.

CCAC provides a consumer-oriented service in its regional and district offices. Staff in these offices who respond to public inquiries should receive appropriate training to further support the metric communication activities in the regions during the period to phase-out, and should be able to assume responsibility for responding to public inquiries in this area after MCC has been closed.

Certain ongoing communications programs were found to have been more useful in the past than they are expected to be in the future. In this regard, the study team recommends that no new promotional supplies be purchased and that all existing MCC promotional aids be distributed in high profile areas (where possible to federal government offices across Canada for use in conference rooms, reception areas, etc. and to the private sector). Further, a large quantity of printed material now being stored is out-dated and should be assessed for its continued usefulness. Useful materials should be distributed to regions and the appropriate agencies; the rest, destroyed, and the warehouse closed as soon as arrangements can be made.

The study found that certain MCC communication strategies should be modified. Paid advertising as appropriate and required should be considered on a case-by-case basis for use in the future. Complete reliance on free media time was found

to be unwise as the MCC has neither control over the amount of total exposure a message actually receives nor over whether the intended target groups are ever exposed to the message or to what degree. In addition, the study found that there is an expressed need for simple aids such as conversion tables for the public in general, for specific target groups and for specific sectors. MCC should encourage any and all private sector efforts to meet these needs in assisting consumers in adapting to the use of S.I.

The study indicates that the current agreements with the provinces for metric information and co-ordination should generally not be renewed at the end of their contract terms (March 1984). Exceptions could be made in cases where, upon consideration of costs and benefits of renewal versus viable alternatives (such as making greater use of private sector firms) and after consultation with the provinces, MCC management wishes to renew a contract. In such a case, contracts could be renewed for no longer than one year to coincide with the recommended close-down date of MCC.

4.4.3 Assistance to Sector Committees

The study team, in collaboration with MCC staff, have identified the expected stand down dates of the sector committees and the kind of MCC support that is desired and appropriate over the phase-out period. In this regard, the study team recommends that MCC:

- 1) assist the sector committees that have been identified to complete their work, and stand down by the close-down date (March 1985),
- 2) inform all sector committees that MCC support will end at that time.

During the final phases of the study, the study team, in close collaboration with management and staff of MCC, undertook a detailed and comprehensive examination of the situation in each sector, expected MCC activities and tasks, expected outputs, timeframe and resource levels. This analysis permitted the study team to estimate as an aggregate figure, the resource requirements for this activity area over the phase-out period, and these aggregate figures are reflected in the estimates presented in this report. Further analysis and production of more detailed breakdowns will be undertaken as required by MCC, once specific plans and intermediate and final targets are set in the various sectors, a task which will require a significant amount of collaboration with sector committee members in the next few months.

With regard to the stand down of sector committees, the study team has forecast that of the total number of 104 sector committees and working groups, about 30 will have stood down by March 31, 1983, another 30 by March, 1984 and an additional 25 by March, 1985, the recommended MCC close-out date. This will leave about 20 sector committees at the close-out date. Conversion of these remaining sectors is expected to occur gradually, without the MCC, and no negative effects are expected in those sectors, as adequate preparation for continued assistance either by an industry association or by government can be put in place over the period of MCC phase-out. The forecast is presented graphically in Appendix 1 of this report.

The specific tasks required to support the sector committees over the phase-out period, the resource implications and the specific schedules and expected output/results have been assessed by the study team. In general, it is expected that MCC resource requirements will decline as the number of sector committees declines.

The number of sector committees remaining is not meant as a precise indicator of MCC workload in the area of assistance to sector committees but rather, as a general guideline for the phase-out plan and MCC resource requirements. Some sectors are much more active than others and require different levels of assistance from MCC. The committees differ in size, economic significance, significance for conversion to SI, visibility and complexity. Sector committees are stood down once the tasks that the committee can effectively achieve have been completed. This does not mean necessarily that conversion is complete in that sector, but rather that the foundation has been put in place. In some sectors, it is probable that continued assistance in that sector may be required in the future to deal with conversion-related problems that could potentially arise. Adequate provisions for continued program monitoring and problem resolution will have to be put in place over the MCC phase-out period. General guidelines are provided in this report.

4.4.4 Measurement-Sensitive Clauses in Legislation

The study has identified 47 federal statutes with measurement-sensitive clauses which remain to be amended. As regards federal regulations, there is still considerable amendment of regulations required in the Department of Transport, and some work in CCAC in the consumer packaging area. As part of the ongoing work of regulatory review and reform, questions related to these regulations should be addressed, and as concerns CCAC, these will be included in the plans for regulatory review and reform now being formulated by the Bureau of Policy Co-ordination, in this regard.

The amendment of federal regulations is proceeding as an ongoing and continuous process, with metric amendments being made as regulations are revised and modified for other reasons. At the provincial and municipal levels, no legislation is seen as prohibiting metric conversion. Detailed discussion

of potential problems which were identified and legislation which may inhibit conversion is found in the consultant's report. Provision is made in the proposed phase-out plan for MCC to take required actions to assess and address these potential problems. All the study modules indicate that the ongoing legislative amendment schedule is not affecting the pace of conversion as much as other, more important factors such as the level of public awareness, economic conditions and the pace of conversion in the U.S.

In terms of remaining activities and tasks, the legislative analysis indicates that there are no significant negative implications to maintaining the status quo.² A legislative amendment program, responsive to industry needs and which, through monitoring, minimizes difficulties to industry should be maintained by MCC until the MCC close-out date, and thereafter, by the appropriate government departments. The study has addressed the organizational implications for these requirements which have been identified as comprising: liaison and co-ordination with affected parties, consultation and advice, monitoring to facilitate the timely amendment of problematic legislation, and information and communications. The proposed plan for the phase-out of MCC makes provision for these activities to be carried out.

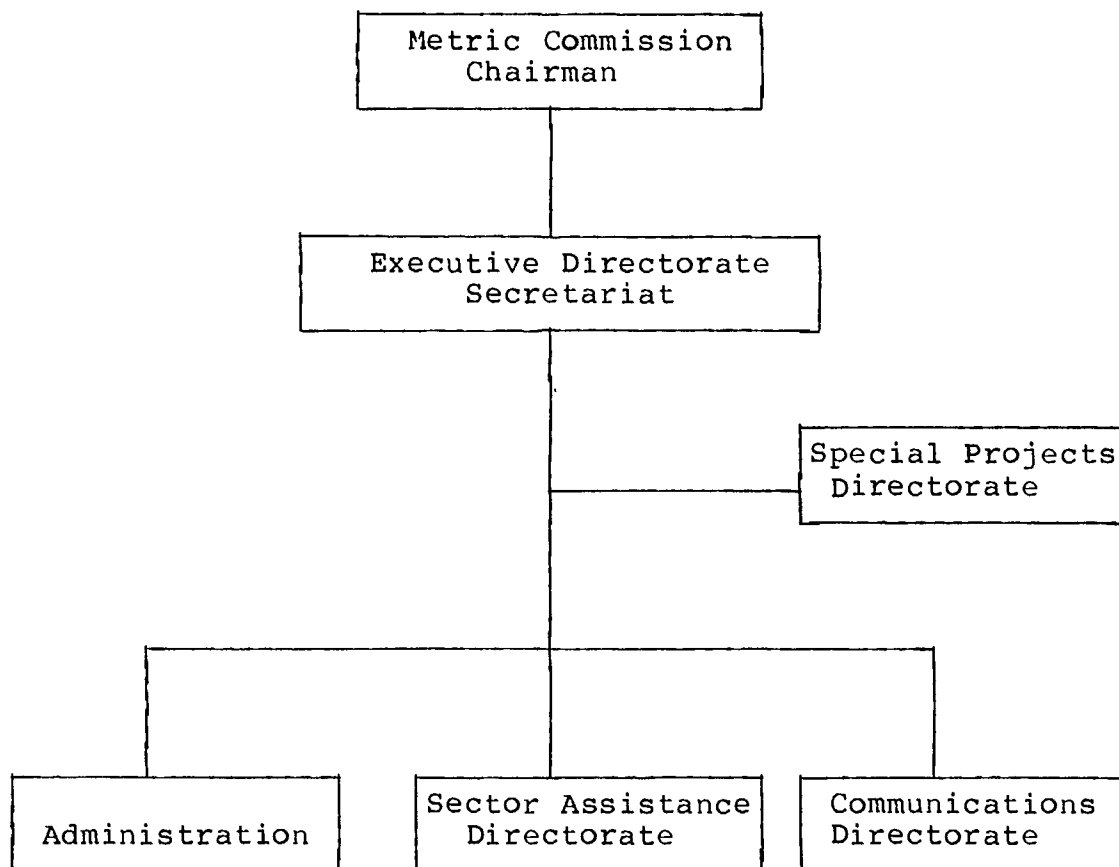
2. Whereas it is acknowledged that there are opportunities to enhance metric conversion through legislation at all levels of government, this option was not considered feasible in light of the current policy framework, in which conversion proceeds on a voluntary, decentralized basis, and regulations/legislation are used only at the request of and in close consultation with all affected parties.

5. ORGANIZATION DURING PHASE-OUT PERIOD

In order to carry out the planned activities, during the phase-out period, MCC should be organized into four directorates and an administrative support unit as depicted in Table 3 below.

TABLE 3

METRIC COMMISSION ORGANIZATION



The Sector Assistance Directorate will be responsible for providing support services to federal government departments and sector committees. As the Workers' Metric Tools Assistance Program is designed to support sector conversion, it is included as a responsibility of this Directorate.

The Communications Directorate will be responsible for the management and coordination of a public awareness/information program that is delivered by private sector public relations firms. These services will include technical assistance in the development of a training program for public servants who are required to use the metric system or respond to public enquiries regarding S.I.

The Special Projects Directorate will be responsible for the accumulation and analysis of information regarding metric conversion and the monitoring of progress being made in implementing legislative changes.

Responsibility for liaison and coordination with the provinces, the U.S. and other trading countries will be with the Chairman and Executive Director of the Commission, who may call on any of the staff of MCC to provide support. The MCC Secretariat will likely be in a good position to provide regular support as will the Special Projects Directorate.

Functional organization charts have been prepared for each unit for April 1983, April 1984 and March 31, 1985. These charts are attached at Appendix 3.

6. AGGREGATE RESOURCE REQUIREMENTS

MCC staff requirements are expected to decline in a gradual and steady manner from current levels, to a target level of about fifty persons on April 1, 1984 and about twenty on March 31, 1985 (with commensurate declining salary requirements).

Based on anticipated workload and the understanding that the redeployment of indeterminate staff will receive the highest priority during the phase-out period, this would translate into an estimated requirement for FY 1983-84 of 76 person-years. For FY 1984-85, the estimated requirement is for 40 person-years.

Salary costing estimates for FY 1983-84, based on the utilization of 76 person-years are \$2.87 million. Operating costs for FY 1983-84 are estimated at \$4.42 million. Corresponding figures for FY 1984-85 are \$1.66 million for salary and \$2.40 million for operating costs.

These estimates were prepared with a view to allow MCC management maximum flexibility in completing program tasks by using indeterminate staff or outside contracts as the relocation of personnel takes place over the phase-out period. These figures, however, do not include contingencies for special projects which may arise over the course of the phase-out period and which may be substantial.

All costs and person-year utilization estimates exclude the Workers' Metric Tools Assistance Program which has an operating budget estimate for FY 1983-84 of \$492,000 and a contributions estimate of \$11,000,000. Comparable figures for FY 1984-85 are \$147,000 in operating costs and \$6.5 million in contributions.

Appendix 4 presents, as an example, a breakdown of the person-year utilization estimates and cost estimates for MCC over the phase-out period. Table 4, below, summarizes MCC resource requirements over the phase-out period.

TABLE 4

SUMMARY: MCC RESOURCE REQUIREMENTS

	<u>1983-84</u>	<u>1984-85</u>
Person years (PY)	76 ==	40 ==
Financial (\$ million)		
Salaries	\$2.87	\$1.66
Operating Costs	4.42	2.40
	-----	-----
Subtotal	<u>7.29</u>	<u>4.06</u>
Workers' Metric Tools Assistance		
Operating Costs	0.49	0.15
Contributions	11.00	6.50
	-----	-----
Subtotal	<u>11.49</u>	<u>6.65</u>
TOTAL MCC (\$ million)	\$18.78 =====	\$10.71 =====

7. PROGRAM REQUIREMENTS AFTER MARCH 1985

Comments and recommendations presented in this section are meant to provide general direction for further analysis by MCC and other concerned parties. Detailed estimates of program resource requirements for the period after March 1985 should be prepared for inclusion in next year's MYOP. Arrangements will have to be put in place during calendar year 1984 so that required program activities can continue after MCC is closed. MCC management has the responsibility of carrying out the necessary consultations and analysis in order to make these detailed arrangements.

Table 5

ACTIVITIES WHICH WILL CONTINUE AFTER MCC PHASE-OUT

<u>Priority Areas</u>	<u>Continuing Activity</u>	<u>Agencies Involved</u>
Federal govern- ment	-Continued monitoring of progress in use of S.I. throughout govern- ment	-Metric Office -TB, TBS
	-Continued monitoring of amendments of federal legislation and regula- tions	-Metric Office -Legislative Programming Branch, Justice
Information and public awareness	-Responding to complaints and inquiries	-CCAC -Field offices -Metric Office
	-Providing pamphlets as required for identified target groups	-Communication Branch, CCAC
Sector support	-Continued monitoring of progress in use of SI in the major economic sec- tors	-Metric Office
	-Providing assistance to facilitate conversion and enhance the conver- sion efforts of indus- try, other levels of government and the general public.	-Metric Office -Other federal departments and agencies within their special- ist mandates

7.1 Metric Office

A small Metric Office should be set up, perhaps within the Bureau of Consumer Affairs. Initial staffing of the Office is expected to require about 6 person-years in FY 1985-86, declining to 4 person-years by March, 1988 and thereafter. Operating costs should be estimated by MCC and included in next year's MYOP. The role of this Office should be reassessed periodically. The Office would be responsible for the continuance of the on-going activities as listed in Table 5 above.

The main outputs of the Office would be:

- 1) Answers to enquiries; information on progress of conversion to TBS and federal government departments as requested;
- 2) Pamphlets and fact sheets as required;
- 3) Assistance to industry and all levels of government in completing conversion to S.I., which could include providing information, attending industry or public meetings and advising the Minister on all matters related to conversion to metric.

The staff of CCAC who come into contact with complaints and inquiries concerning S.I., both in headquarters, and in the regions should receive sufficient training so that they are capable of handling complaints and inquiries regarding use of S.I. No resource implication has been identified.

The Communications Directorate will take on responsibility for any additional pamphlets or publications required by the program.

Three additional person-years and required operating expenses should be provided for a three-year period during which time metric communication activities would be rolled-in with ongoing work. Senior communications officials in the regions would respond to inquiries from the media for this program, as for all other departmental programs. No significant additional field resources are expected to be required to deal with issues related to conversion.

7.2 Standards Council

The Standards Council will continue to undertake technical work on metric standards, and correct use of S.I., including authorizing the use of the metric symbol. No additional resources are expected to be required as this work has been and is now undertaken by the Standards Council for MCC.

7.3 Treasury Board Secretariat

TBS would continue to monitor compliance with any TB directives related to metric conversion.

7.4 Department of Justice

Legislative Programming Branch of the Department of Justice would be responsible for reviewing any proposed legislative or regulatory initiatives or amendments to ensure that measurement-sensitive clauses are consistent with metric policy and any TB directives related to metric policy.

7.5 Other Federal Departments

All federal departments, agencies and Crown corporations will continue to have responsibility for the increased use of S.I. in all internal and external communications and

for amending legislation and regulations with measurement-sensitive clauses within their ongoing programs of legislative and regulatory review and amendment.

The Public Service Commission" should have responsibility for continuing preparation and delivery of appropriate training so that all public servants who may be required to use S.I. have the requisite level of knowledge of S.I. The timeframe for this activity should be determined jointly by MCC and PSC over the next twelve to eighteen months.

Some departments will take on responsibility for meeting industry problems in specific sectors related to conversion to S.I. Generally, these departments have in place ongoing and regular means of consultation and communications with their target publics but may wish to continue with the MCC sector committees now set up for a given sector. In general, all major sectors which have not stood down should be transferred to the relevant department. For example responsibility for conversion related matters in the air and rail transportation sectors should be transferred to Transport Canada; responsibility for the livestock sector, to Agriculture Canada; responsibility for a number of industrial sectors, including those related to construction, to Industry, Trade and Commerce.

APPENDIX 1

FORECAST OF SECTOR COMMITTEES
EXPECTED TO STAND DOWN

APPENDIX 1: FORECAST OF MCC SECTOR COMMITTEES
EXPECTED TO STAND DOWN

As an indicator of the scope of the MCC activities over the phase-out period a forecast of stand downs has been prepared.

The "number of sector committees remaining" is more a guideline than a precise indicator of MCC workload in this area as some sectors are much more active, larger, more complex, more visible and/or more significant for the conversion process than others. It must here be stressed that the concept of standing down a committee does not necessarily mean that conversion is complete in the sector, but rather, that the foundation has been laid for conversion to occur in the sector and that the sector committee has completed all tasks that, in the opinion of the members, it was able to complete.

It is of course possible that problems related to conversion may come up from time to time in a given sector after a sector committee has stood down or the MCC has been closed down. In the phase-out period, appropriate arrangements will have to be put in place to ensure that these potential problems can be met after the MCC close-down.

The scenarios presented on the following page are based on consultations with sector committee members, case studies, and discussions with MCC staff.

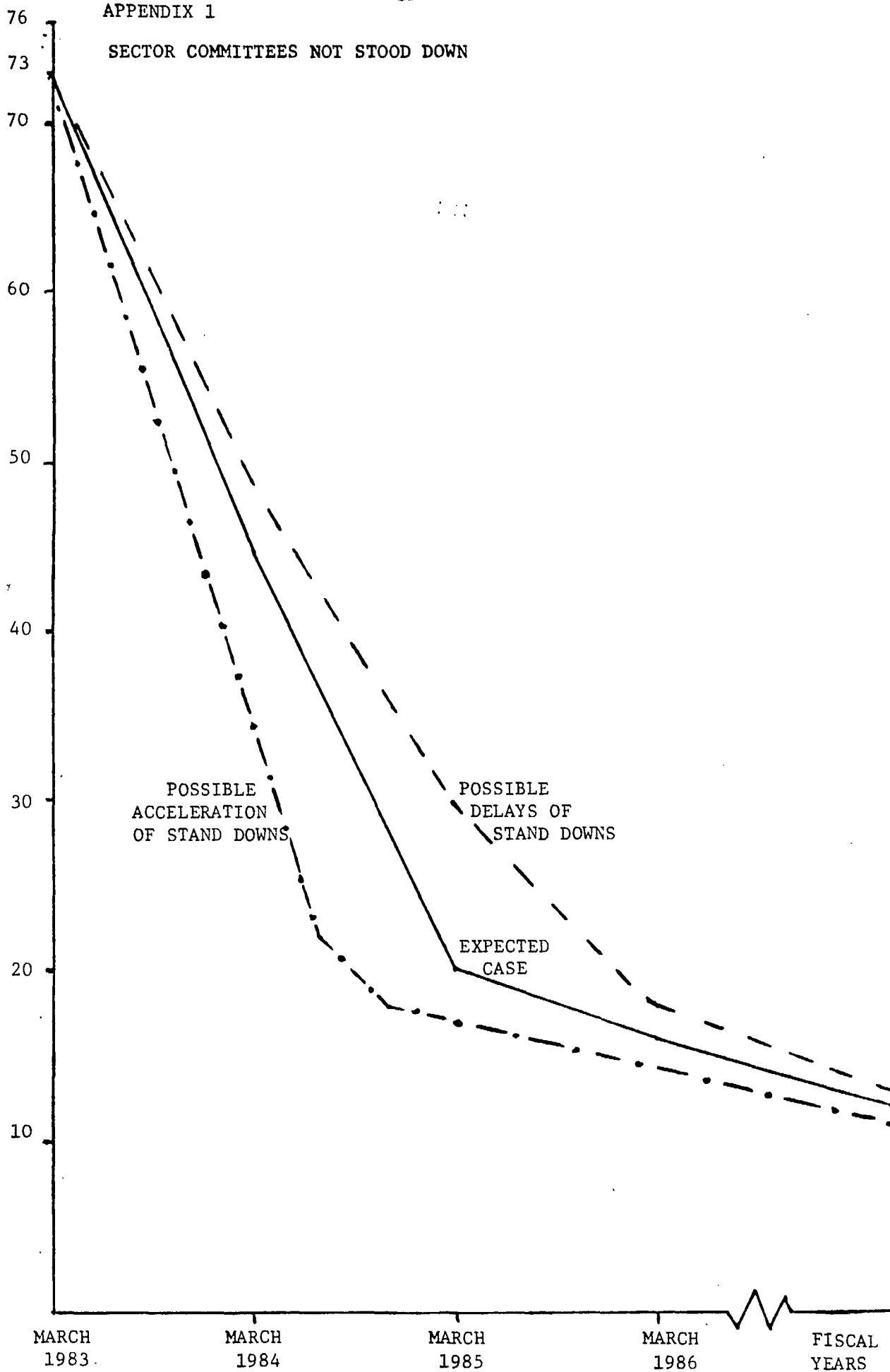
The "Accelerated" case assumes that MCC work with sectors can be compressed by six months and stand downs completed by Fall 1984.

The "Delayed" case incorporates delays in specific sectors which, while not expected are still possible. These possible delays are based on discussion with MCC staff. It is noted that some MCC staff feel this is an optimistic scenario.

APPENDIX 1

SECTOR COMMITTEES NOT STOOD DOWN

NUMBER OF
SECTORS
REMAINING



APPENDIX 2

SECTORS CONSTRAINED BY
CONVERSION IN U.S.

APPENDIX 2: SECTORS CONSTRAINED BY CONVERSION IN U.S.

<u>Sector No.</u>	<u>Sector Title</u>
1.01	Air Transport
1.02	Rail Transport
2.04	Motor Vehicle & Parts Manufacturers
2.05	Truck Body & Trailer Manufacturers
2.06	Railroad Rolling Stock
2.08	Heating, Ventilating, Air Conditioning and Food Service Equipment
2.09	Plumbing & Hydronic Heating
2.11	Fasteners Industry
2.25	Builders and Home Hardware
2.32	Machinery and Fluid Power
2.34	Recreational and Outdoor Power and Specialized Equipment
3.02	Radio, T.V., Communication, Electronic Equipment & Parts
3.03	Aircraft & Aircraft Parts Manufacturers
3.04	Business Machines, Scientific & Professional Equipment
5.03	Structural & Architectural Metals
61.05	Horticulture
8.20	Wood
8.45	Paper & Allied Industries, Printing and Publishing
9.21	Amusement and Recreation

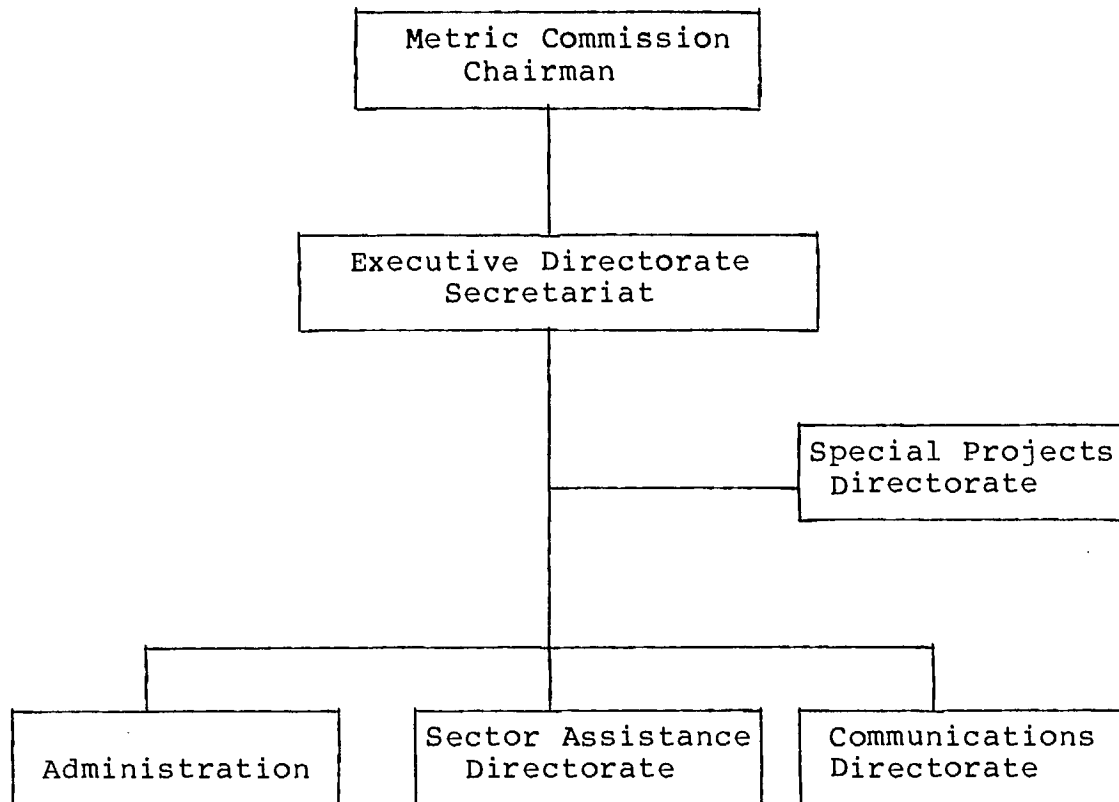
APPENDIX 3

ORGANIZATION CHARTS

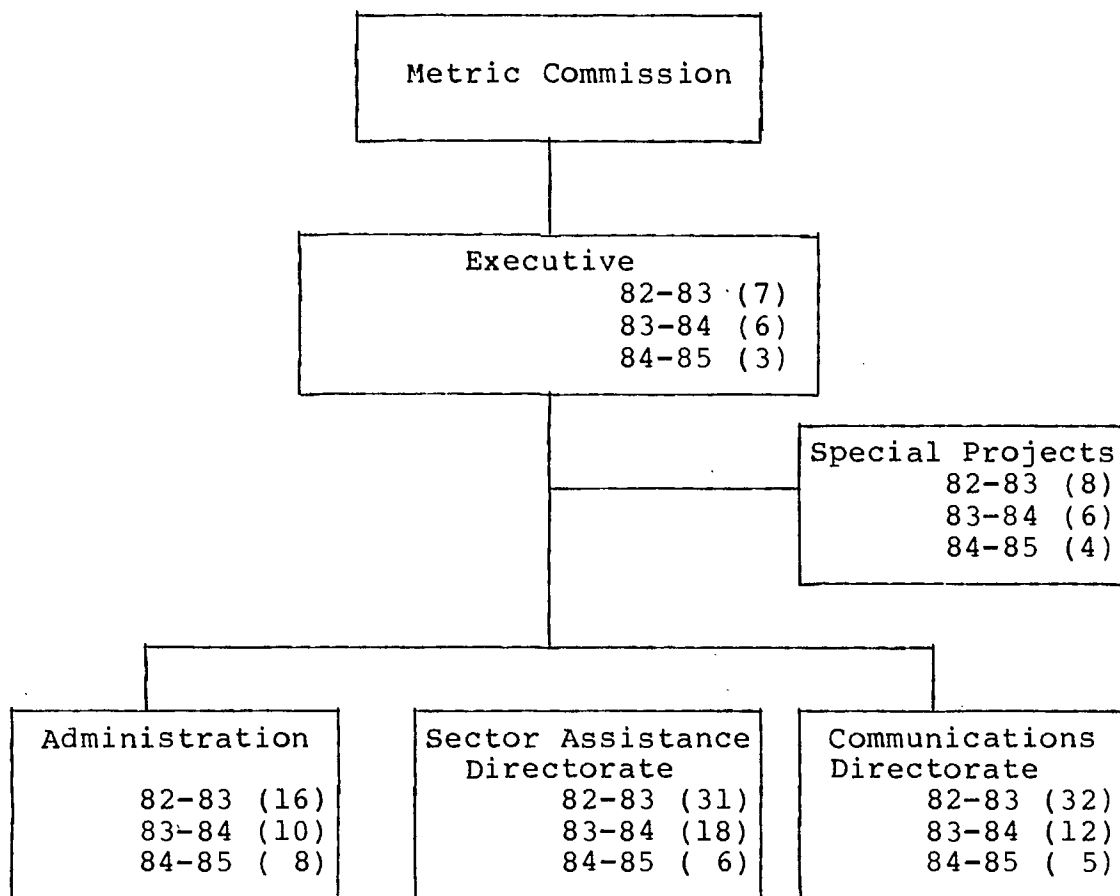
Charts presented are suggested structures only, and are subject to continuous refinement and change by MCC Management.

METRIC COMMISSION CANADA

APRIL 1, 1983



PHASE-OUT TARGETS
(Number of employees expected to be in place
at end of fiscal year)



PY required for persons seconded to other departments

G. Seropian - 1 PY -1983-84 to External Affairs

S. Volk - 1 PY -1983-84 to Fisheries

V.J. Pelisek - 1 PY -1983-84 to Regional and Industrial
Expansion

- 1 PY -1984-85

PHASE OUT TARGETS (con't)

Summary

year-end 1982-83 - 94 employees in place (+ 3 on secondment)

year-end 1983-84 - 52 employees in place (+ 3 on secondment)

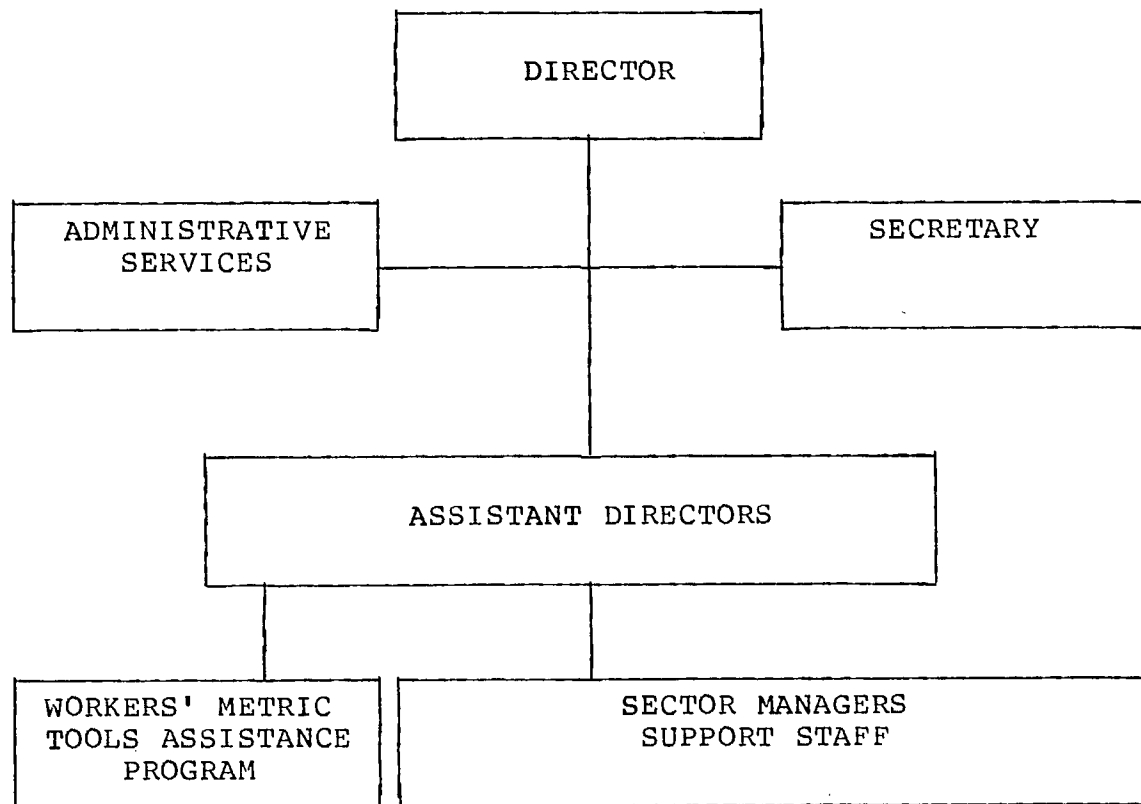
year-end 1984-85 - 26 employees in place (+ 1 on secondment)
(would be reduced to 20 if MCC is relocated to CCAC in
December 1984 - Administrative services would be reduced
from a requiremnt of 8 to 1).

Projected staffing levels required to continue conversion
program activities after April 1, 1985.

CCAC Metric Office	- 6 declining to 4
CCAC Administration	- 1
CCAC Communications	- 3 for 3 years
Other departments	- 0
	<u>10</u>

FUNCTIONAL ORGANIZATION CHART

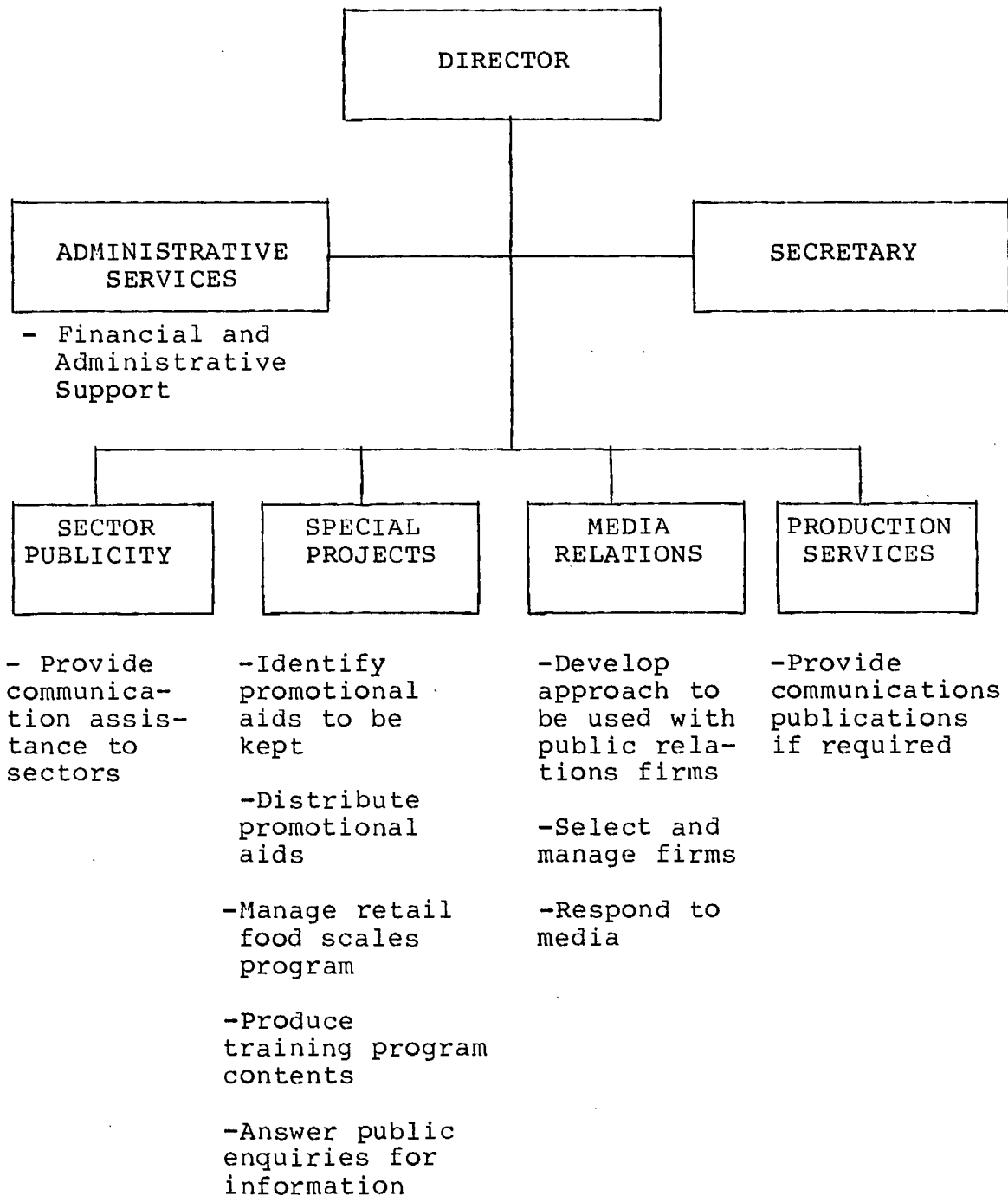
SECTOR ASSISTANCE DIRECTORATE - APRIL 1983



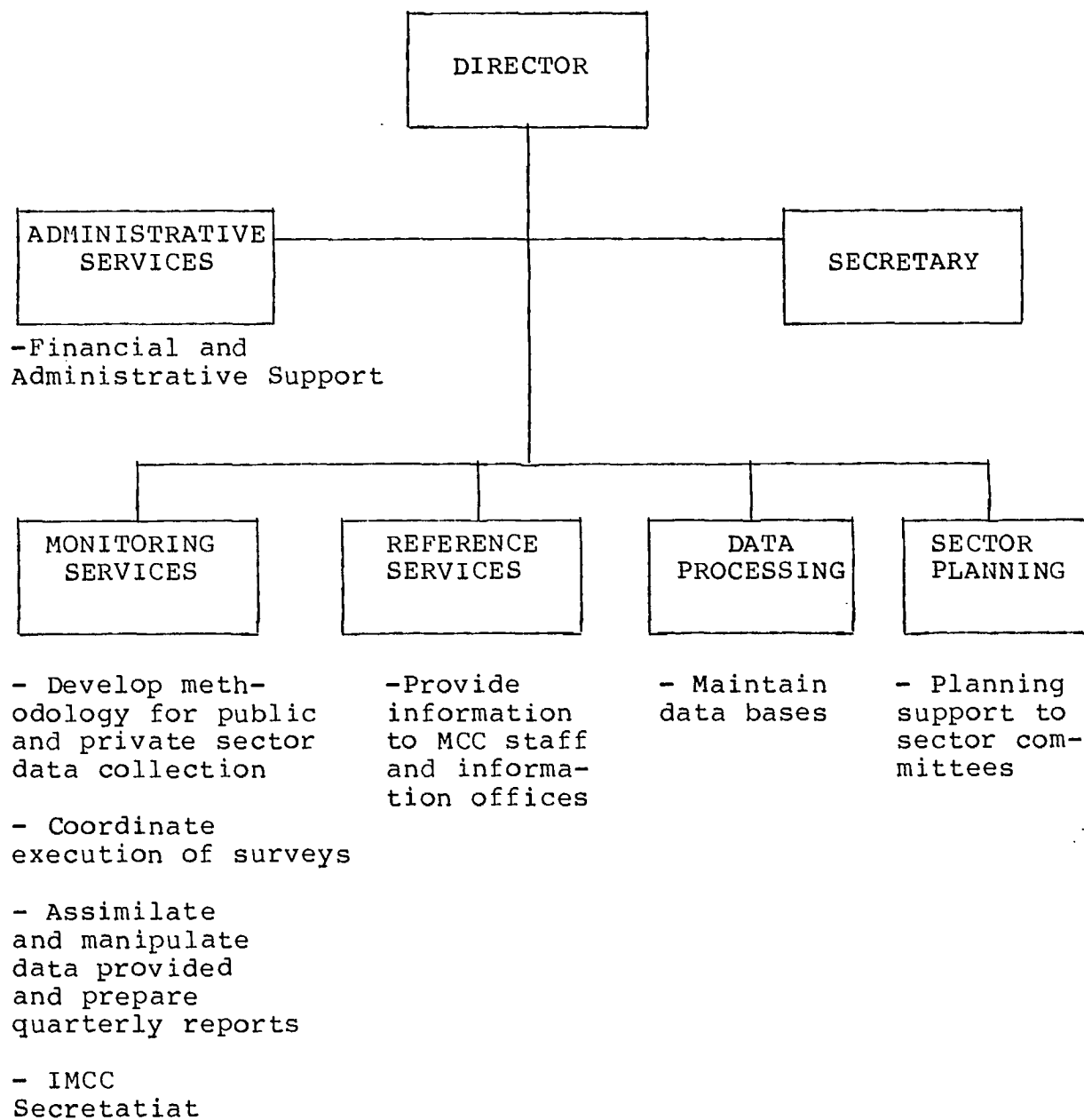
- Manage Program

- Determine remaining type of assistance required by sector committees
- Assist sectors in standing down
- Obtain information on progress of sectors
- Provide contact point for all issues raised by sector committees
- Identify type of support required by departments
- Obtain information on progress being made on changes to legislation and regulations.

FUNCTIONAL ORGANIZATION CHART
COMMUNICATIONS DIRECTORATE - APRIL 1983

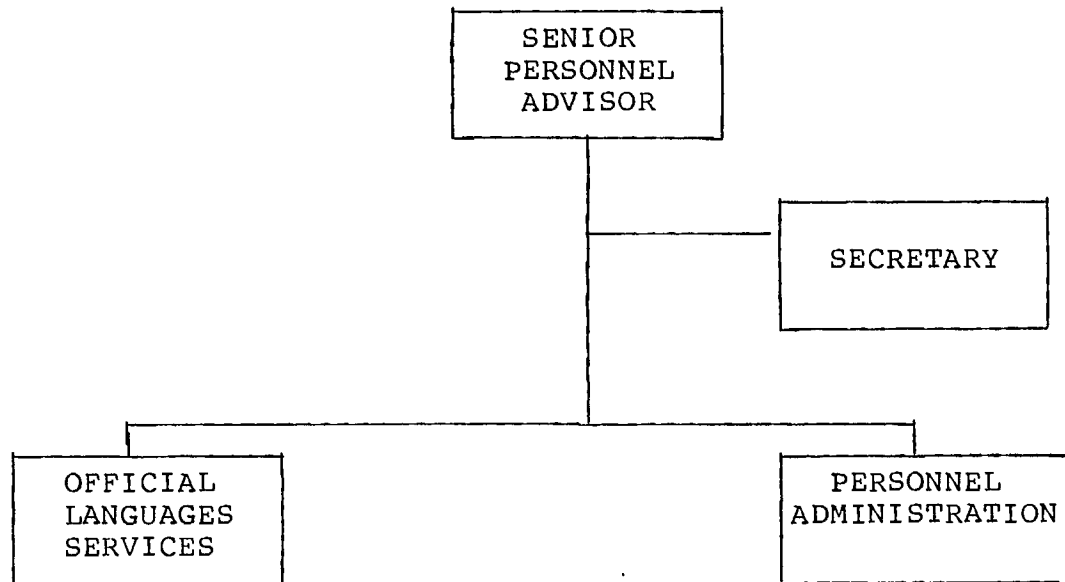


FUNCTIONAL ORGANIZATION CHART
SPECIAL PROJECTS DIRECTORATE - APRIL 1983



FUNCTIONAL ORGANIZATION CHART

PERSONNEL - 1983-84



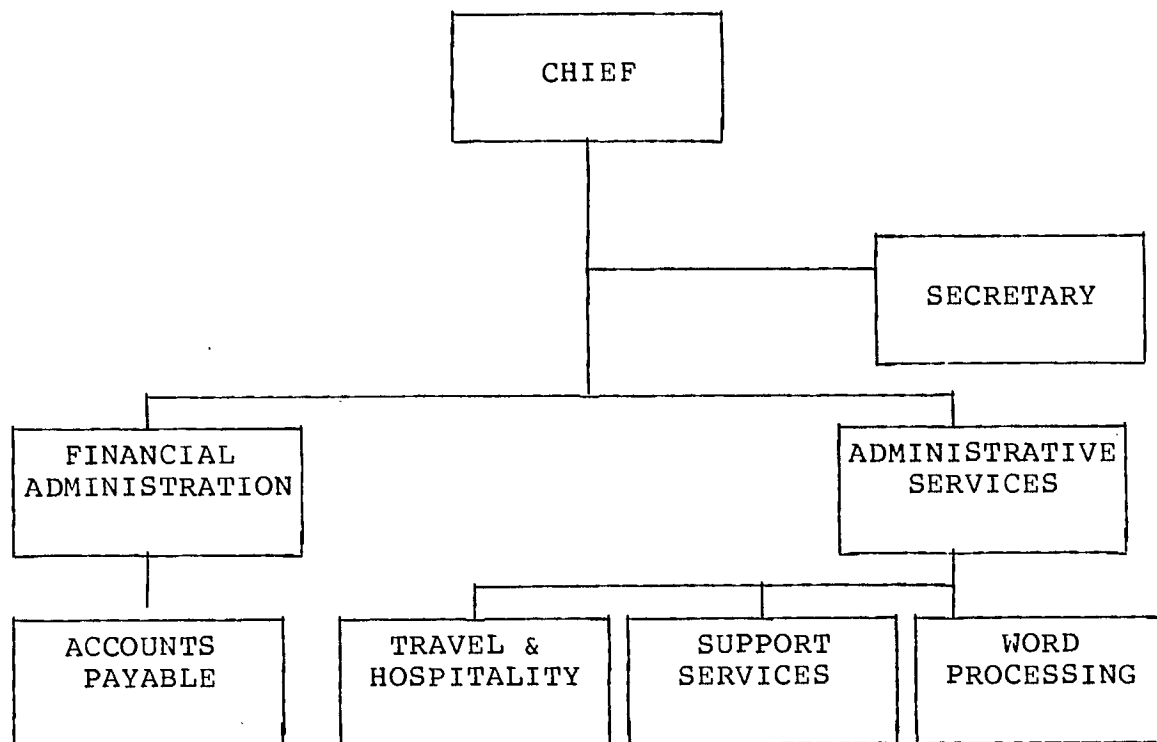
* Provide assistance in preparing letters, reports, etc.

- Agency hiring
- Accuracy of agency accounts
- Attendance reports
- Cheque distribution
- Pay and benefits
- Staff relations administration
- Training records

SENIOR PERSONNEL ADVISOR

- Career plans
- Arrangements for employees remaining with MCC
- Redeployment of staff
- T.B. negotiations on personnel matters if necessary

FUNCTIONAL ORGANIZATION CHART
ADMINISTRATION - APRIL 1983



- Make payment of all accounts including travel agency accounts

- Prepare financial reports

- Prepare budgets

- Make travel arrangements

- Ensure accuracy of accounts

- Receptionist

- Messenger

- Building Maintenance

APPENDIX 4

RESOURCE ESTIMATES

APPENDIX 4

PERSON-YEAR UTILIZATION CALCULATIONS

Staff in Place

	April/83	April/84	April/85	Transfer**
Management	7	6	3	3 -to CCAC
Sector Assistance	31	18	6	2 -to CCAC
Special Projects	8	6	4	1 -to CCAC
Administration*	16	10	8	1 -to CCAC
Communications	32	12	5	3 -to CCAC
Totals	94	52	26	10

PERSON-YEAR ESTIMATES

	<u>Staff in Place</u>				<u>Staff on</u>		<u>Total</u>
	<u>Start</u>		<u>End</u>		<u>Secondment</u>		
	<u>with</u>		<u>With</u>				
1983/84	94	+	52	= 146 ÷ 2 = 73 PY	+	3 PY	76 PY
1984/85	52	+	26	= 78 ÷ 2 = 39 PY	+	1 PY	40 PY

* Includes Personnel

** Projected staffing levels for program April, 1985.

APPENDIX 4

SALARY COST ESTIMATES

CATEGORY & GROUP	AVERAGE ANNUAL SALARY	PERSON-YEARS		TOTAL COST	
		1983-84	1984-85	1983-84	1984-85
Executive	60,014	5.0	4.5	\$ 300,070.00	\$270,063.00
Administrative Services	27,197	4.5	3.5	122,386.50	95,189.50
Information System	37,000	6.0	2.5	222,000.00	92,500.00
Commerce	50,632	19.5	10.0	987,324.00	506,320.00
Purchasing and Supply	25,359	1.0	0.5	25,359.00	12,679.50
Data Processing	27,451	1.0	0.5	27,451.00	13,725.50
Clerical	19,446	13.5	6.0	262,521.00	116,676.00
Secretary & OCE	18,704	23.5	13.0	439,544.00	224,448.00
General Services	18,143	1.5	0.5	27,214.50	9,071.50
General Technical	33,825	<u>0.5</u>	<u>0</u>	<u>16,912.50</u>	<u>--</u>
Totals:		76.0	40.0	\$2,430,782.50	\$1,340,673.00
				anticipated increment 5%	<u>\$67,033.65</u>
					\$1,407,706.65
Severance				6,000.00*	3,600.00**
Overtime				61,000.00*	36,600.00**
Bilingual Bonus				<u>54,000.00*</u>	<u>32,400.00**</u>
				\$ 121,000.00	\$ 72,600.00
Employee Benefits	(1983-84) .13 x 2,430,782.50 =			\$316,001.73	
13% of Salaries and	(1984-85) .13 x 1,407,706.65 =				<u>\$183,001.86</u>
Wages					
		Total Costs		<u>\$2,867,784.23</u>	<u>\$1,663,308.51</u>

* Figures taken directly from 1983-84 MCC Main Estimates

** 1983-84 Main Estimates figures reduced by 40% (45% reduction in staff plus annual cost increment of 5%)

Appendix 4

MCC - OPERATING COST ESTIMATES- SUMMARY*
(000's)

		<u>1983-84</u>	<u>1984-85</u>
02	Travel & Relocation	\$ 684.1	340
	Postage & telephones	185	103.5
	Hospitality	34	17
03	Transportation & Communications:		
	Exhibits	750	200
	Annual Report	60	10
	Other Publications	285	75
04	Professional and Special Services:		
	Management	139	75
	Sector Assistance Directorate	200	150
	Public Relations Firms	560	560
	Provincial Government Contracts	660	300
	Metric Usage Studies	100	100
	Monitoring Assistance	40	40
	Administration	75	50
	Training	45.4	-
	Data Processing	81	45
05	Rentals	112	61
06	Purchased Repairs and Supplies	31.5] 112
07	Utilities, Materials and Supplies	185	
08	Acquisition of Equipment	8	
	Temporary Help	182	163.8
		<hr/>	<hr/>
	Total	<u>\$4,417.0</u>	<u>\$2,402.3</u>

* Excludes Workers' Metric Tools Assistance Program

** Management hospitality costs have been included as part of Travel and Relocation expenses.

NOTE: These estimates do not include contingencies for special projects. In 1982-83, contingency costs for MCC were approximately \$300,000.

Appendix 4

MCC - OPERATING COST ESTIMATES- SUMMARY
(000's)

	<u>1983-84</u>	<u>1984-85</u>
Management	\$ 319.2	\$ 195.2
Sector Assistance Directorate	841.6	452.9
Communications Directorate	2,783.6	1,413.6
Special Projects Directorate	267.2	213.2
Administration	<u>205.4</u>	<u>127.4</u>
Sub-total	4,417.0	2,402.3
Worker's Metric Tools Assistance Program	<u>492.0</u>	<u>147.6</u>
Total MCC operating costs	<u><u>\$4,909.0</u></u>	<u><u>\$2,549.9</u></u>



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Canada. Consumer and Corpora
Work plan for the phase-out

