

April 15, 2008

HON. MICHAEL L. RAMA
Vice Mayor/ Presiding Office
Sangguniang Panlungsod
City Hall
Cebu City

Dear Vice Mayor Rama:

We are returning herewith the draft of the proposed ordinance regulating the business of liquified petroleum gas (LPG) for automotive use and the establishment of auto-gas LPG dispensing stations with our comments and observation, to wit -

- in the second Whereas clause, we suggest the word plenty be changed with another term to describe a substantial number.
- in the fourth Whereas clause, we suggest to delete the word unwanted since its a surplusage. All accidents are unwanted.
- in Section 3(a), what is a “monitoring” public? Could it be “motoring” public?
- in Section 3(b), what is a “dedicated” Auto-LPG business premises? We suggest either to delete that word or replace it with another adjective.
- the definition of a garage-based operation in Section 6 and the definition of public place in Section 10(e) should be transferred or moved under Section 3.
- what is the difference between “prior to engagement” and “prior to commencement” in Section 8. The two sub-sections can be merged.

- in Section 19, third offense shall be punished by the cancellation or revocation of business permit and/or imprisonment of not more than one (1) year at the discretion of the court. Does this mean that before the city can revoke the business permit or license there has to be an order from the court. Is this also the intention in Section 7?

In fine, we are of the view that the proposed ordinance is within the power and authority of the City of Cebu to enact.

Truly yours,

PEDRO A. NOVAL, JR.
Regional Director

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