

# Digital Advertising Signage M4 Motorway Overpass, Homebush West

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Section 4.55(1A) Modification Assessment DA 23/7153 (PAN-352793)

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Title: Digital Advertising Signage M4 Motorway Overpass, Homebush West

Subtitle: Section 4.55(1A) Modification Assessment DA 23/7153 (PAN-352793)

*Cover image: Current View of signage (Source in Applicants report: DBCE 2022)*

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# Glossary

Abbreviation	Definition
<b>Applicant</b>	Sydney Trains
<b>Application</b>	DA 23/7153
<b>Councils</b>	Cumberland City Council and City of Parramatta Council
<b>DA</b>	Development Application
<b>DCP</b>	Development Control Plan
<b>Department</b>	Department of Planning and Environment
<b>EP&amp;A Act</b>	Environmental Planning and Assessment Act 1979
<b>EP&amp;A Regulation</b>	Environmental Planning and Assessment Regulation 2021
<b>EPI</b>	Environmental Planning Instrument
<b>Guidelines</b>	Transport Corridor Outdoor Advertising and Signage Guidelines 2017
<b>IESEPP</b>	State Environmental Planning Policy (Industry and Employment) 2021
<b>TISEPP</b>	State Environmental Planning Policy (Transport and Infrastructure) 2021
<b>LEP</b>	Local Environmental Plan
<b>LGA</b>	Local Government Area
<b>Minister</b>	Minister for Planning
<b>RtS</b>	Response to Submissions
<b>SEPP</b>	State Environmental Planning Policy
<b>TfNSW</b>	Transport for NSW
<b>TTPP</b>	The Transport Planning Partnership

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# 1 Introduction

This report provides the NSW Department of Planning and Environment's (the Department's) assessment of an application to modify the Development Application (DA 23/7153) lodged by Transport Asset Holding Entity of NSW (Sydney Trains) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

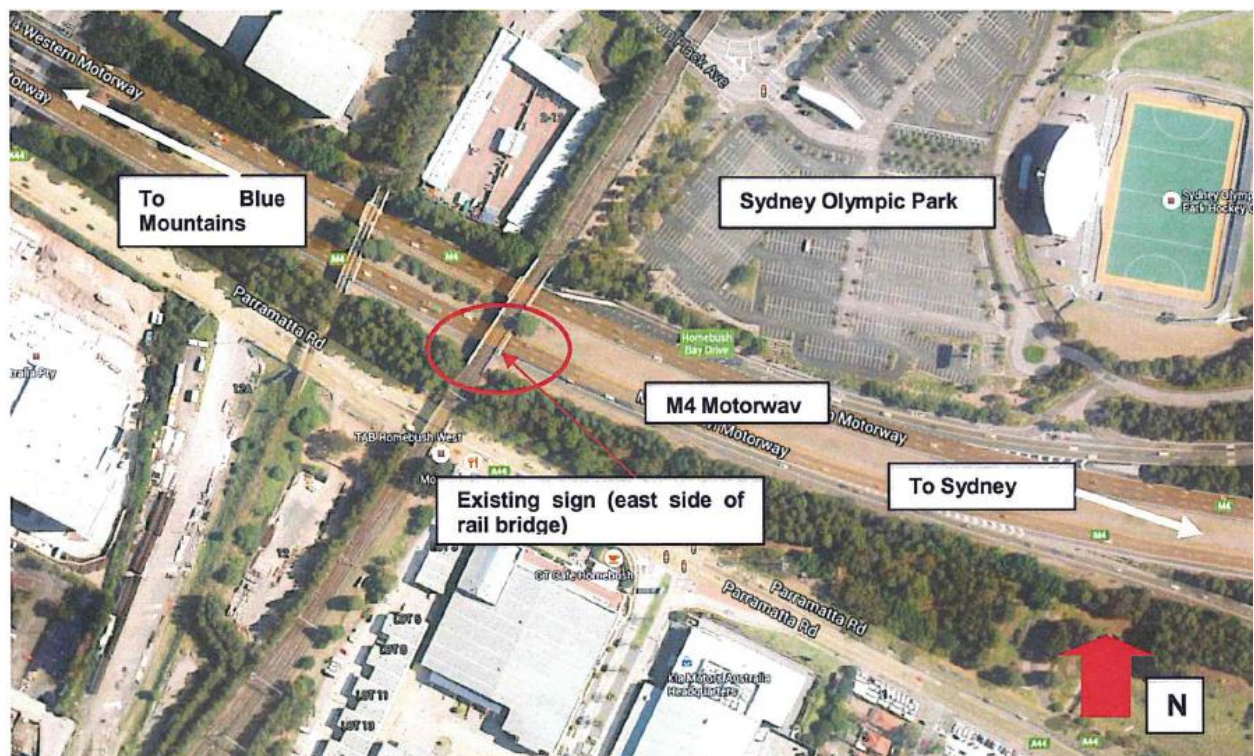
Sydney Trains (the Applicant) seeks to modify:

- Condition A2 of DA16/7153, to alter sign operator and logo
- Condition A6 of DA16/7153, to decrease the advertising dwell time from 45 seconds to 25 seconds

## 1.1 Background

The site is the eastern side of the rail bridge within the M4 Motorway corridor. It sits on the boundary of Cumberland City Council and City of Parramatta Council Local Government Areas (LGA's).

The M4 Motorway is a 526 km, high speed roadway, that runs from Sydney's Inner West to Glenbrook in the Blue Mountains. The subject section of the road is separated by a grassed median, wire rope safety barriers and surrounded by roadside landscape embankments. The sign is located on the eastern side of the rail bridge and can be predominately viewed by traffic traveling west (outbound).



**Figure 1:** Location map (Source: Original Assessment Report DA 16/7153)

## 1.2 Approval history

Consent was granted for DA 16/7153 on 16 January 2016 for the alterations and digital conversion of existing east-facing digital advertising structure. The approved development comprises of:

- removal of the existing steel frame and advertising light box mounted to the east face of the rail bridge
- installation of a new steel support structure measuring 3.3 m x 15.68 m (51.74 m<sup>2</sup>) including colour bond cladding and APN logo box; and
- installation of a new east facing digital light emitting diode (LED) advertising screen used for the display of a general advertising, with a screen size of 3.20 m x 12.58 m (40.26 m<sup>2</sup>)

The sign has since been installed. The original consent has not been modified to date.

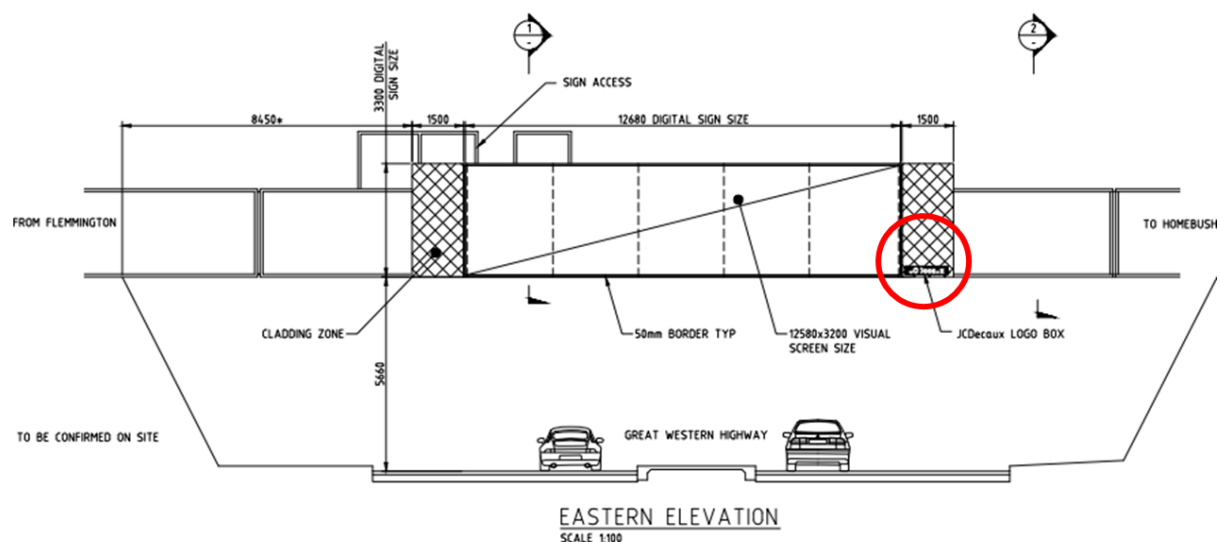


## 2 Proposed modification

The modification application requests to modify the approved plans and conditions of DA 16/7153 as follows:

- Amend the approved plans (as referenced in Condition A2), to alter signage operator, to JCDecaux, and change the logo.
- Amend Condition A6 to decrease the advertising dwell time to from 45 seconds to 25 seconds

All other features and characteristics of the approved signage will remain the same.



**Figure 2:** Proposed plans with logo shown by red circle (Source: DBCE/Keylan markup)

### 2.1 Applicant's justification

The Applicant states that the modification, in relation to the amendment of the approved plans, is proposed in order to reflect of the current signage operator and their associated logo. In relation to the modification to Condition A6, the Applicant asserts that the proposed decrease to dwell time (from 45 seconds to 25 seconds) will not have adverse implications to traffic safety and the proposed dwell times continue to comply with current requirements of State Environmental Planning Policy (Industry and Employment) 2021 (IE SEPP) and the NSW Transport Corridor Outdoor Advertising and Signage Guidelines (Guidelines) 2017.

## 3 Statutory Context

### 3.1 Scope of Modification

Section 4.55(1A) of the EP&A Act outlines the matters that a consent authority must take into consideration when determining an application that seeks to modify a Part 4 consent and results in minor environmental impacts. The matters for consideration under section 4.55(1A) of the EP&A Act that apply to the modification of the project approval have been considered in Table 1.

Table 1 | Section 4.55(1A) Evaluation

Section 4.55 (1A) Evaluation	Consideration
a) that the proposed modification is of minimal environmental impact, and	Section 5 of this report provides an assessment of the issues associated with the proposed changes. The Department is satisfied that the proposed modification will have minimal environmental impacts.
b) that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all), and	The proposed modification seeks to change the sign operator logo on the approved sign and decrease the digital advertising sign dwell time to from 45 seconds to 25 seconds time. All other features and aspects of the approved signage remain the same as approved. Therefore, the Department is satisfied that the proposed development as modified would be substantially the same as originally approved.
c) the application has been notified in accordance with the regulations, and	Notification of the modification application was not required in accordance with the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation). Details are provided in Section 4 of this report.
d) any submission made concerning the proposed modification has been considered.	The Department received confirmation from Transport for NSW (TfNSW), Cumberland City Council and City of Parramatta Council (Councils) that they have no objections to the proposed modification.

The Department has reviewed the scope of the modification application and considers that the application involves minimal environmental impacts as the proposal is substantially the same development as originally approved.



### 3.2 Objects of the Act

The Minister or delegate must consider the objects of the EP&A Act when making decisions under the EP&A Act. The Department has considered the objects of the EP&A Act in its assessment of the modification application and is satisfied that the modification meets the objects of the EP&A Act.

### 3.3 Consent authority

The Minister for Planning and Public Spaces is the consent authority for the modification request. However, under the Minister's delegation, the Team Leader, Key Sites Assessments, may determine the application as:

- a political disclosure statement has not been received,
- no objection from relevant Councils were received, and
- no submissions were received from the public objecting to the proposal.

### 3.4 Mandatory matters for consideration

The approved signage was assessed by the Department against the provisions of applicable EPIs that were in force at the time of the assessment. The Department is satisfied that the proposed modification does not significantly alter the conclusions of the original assessment against those EPIs. The Department has also considered the proposed modification and its associated key assessment issues against the relevant provisions of the current EPIs (**Appendix C – Statutory Considerations**). The Department is satisfied that the proposal is consistent with the current EPIs.

The Department has sought advice from TfNSW as part of the assessment and determination of this application. TfNSW advised no objection to the proposed modification application subject to recommended conditions. Please also refer to **Section 4** for details.

## 4 Engagement

### 4.1 Department's engagement

The Department's Community Participation Plan (CPP), dated November 2019 prepared in accordance with Schedule 1 of the EP&A Act, requires applications for modifications of development consent that are not required to be exhibited by the EP&A Regulations to otherwise be exhibited at the discretion of the Department based on the urgency, scale and nature of the proposal.

The Department formed the view that based on the minor nature of the modification, exhibition was not required however the modification documents were made publicly available on the Department's website and referred to TfNSW, Cumberland City Council and the City of Parramatta Council for review.

### 4.2 TfNSW advice

On the 13<sup>th</sup> September 2023, the Department received comments from TfNSW who noted that they did not have any objections to the proposed modification, subject to conditions of consent stated the dwell time be no shorter than the proposed 25 seconds. TfNSW also recommended that the Department includes the below requirements in any Development Consent.

- The proposed sign shall be in accordance with the Transport Corridor Outdoor Advertising and Signage Guidelines 2017.
- Dwell times between displays shall be no shorter than 25 seconds.
- The images displayed on the sign must not contain/use:
  - Flashing or flickering lights or content.
  - Animated displays, moving parts or simulated movement.
  - Complex displays that hold a driver's attention beyond "glance appreciation".
  - Displays resembling traffic control devices by use of colour, shape or words that can be construed as giving
  - instruction to traffic for example, red, amber, or green circles, octagons, crosses, triangles and words such as
  - 'stop' or 'halt'.
  - A method of illumination that distracts or dazzles; and
  - Dominant use of colours red, amber or green.
- A Road Occupancy Licence (ROL) should be obtained from Transport Management Centre for any works that may impact on traffic flows on the surrounding classified road network and signalised intersections during construction activities. A ROL can be obtained through <https://myrta.com/oplinc2/pages/security/oplincLogin.jsf>.

- A road safety check which focuses on the effects of the operation of the digital signage (as it is over 20sqm) must be carried out in accordance with Part 3 of the TfNSW Guidelines for Road Safety Audit Practices after a 12 month period (but within 18 months) of the operation of the sign under the new/modified consent. The road safety check must be carried out by an independent TfNSW-accredited road safety auditor who did not contribute to the original application documentation.

The above recommendations are already included in the approved Development Consent (DA 23/7153).

### 4.3 Councils' submissions

Cumberland City Council and City of Parramatta Council raised no objection to the sign.

Cumberland City Council provided no further comments.

Parramatta City Council provided general comments in relation to compliance with regulatory controls, visual amenity, illumination impacts, impacts on existing infrastructure, and the need to ensure ongoing safety of drivers.

The issues raised by City of Parramatta Councils have been examined where relevant to the proposed modification and further detail is provided in **Section 5** and **Appendix C**.

## 5 Assessment

The Department has considered in **Table 2** the key assessment issues in relation to the proposed modification to alter signage operator, change the logo and decrease the advertising dwell time.

**Table 2 | Assessment Issues**

Issues	Findings	Recommendations
<b>Visual Amenity Impacts</b>	<p>The Department notes that the signage is within the sightline of the road users traveling west on the M4.</p> <p>Council provided general comments on the potential visual impacts of the sign, stating that:</p> <ul style="list-style-type: none"> <li>• The scheme to be sympathetic to the existing streetscape;</li> <li>• No important views to be compromised or obscured;</li> <li>• No impacts upon the viewing rights of other advertisers;</li> <li>• No unsightliness to be screened;</li> <li>• The illumination will not detract, glare and obscure the safe movement of the traffic on the adjoining street.</li> </ul> <p>The Department acknowledges Council's comments but notes that despite changes to the dwell time and logo, the approved physical and visual aspects of the signage will remain the same, with no proposed changes to the location, size or design or illumination.</p> <p>The Department is satisfied that the modification does not result in changes to the visual amenity considered in the original DA 16/7153.</p>	No additional conditions.
<b>Road safety</b>	<p>The Applicants Traffic Impact Statement, prepared by The Transport Planning Partnership (TTPP), 4<sup>th</sup> May 2023, which examines the alterations to dwell time, concludes that the current approved signage has not adversely impacted traffic safety. In the report TTPP states; <i>"Overall, the number of crashes on the M4 Motorway east approach has not increased following the installation of the digital signage"</i>.</p> <p>Councils and TfNSW did not raise any concerns with road safety. Parramatta Council and TfNSW noted that the proposal was compliant with the Guidelines. Council also refers to other standard requirements such as any impacts on existing infrastructure.</p> <p>The Department acknowledges advice received from TfNSW and Council, but note the application only relate to the dwell time and would not affect the relationship of the sign with existing infrastructure. The Department is</p>	Condition A6 is amended to reflex an advertising dwell time of 25 seconds

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satisfied that the proposed dwell time (of 25 seconds) is acceptable from a road safety perspective, noting the proposed dwell time is consistent with safety standards outlined in the Guidelines.

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## 6 Evaluation

The Department has assessed the proposed modification in accordance with the relevant requirements of the EP&A Act. The Department considers the development as modified by the proposed modifications to be acceptable on the basis that the proposed modification:

- would result in substantially the same development
- is of minor environmental impacts
- complies with statutory requirements of relevant environmental planning instruments

The Department satisfied that the modification can be approved, subject to the recommended conditions (**Appendix B**).

## 7 Recommendation

It is recommended that the Team Leader, Key Sites Assessments, as delegate of the Minister for Planning and Public Spaces:

- **considers** the findings and recommendations of this report
- **determines** that the application DA 23/7153 MOD 1 falls within the scope of section 4.55(1A) of the EP&A Act
- **accepts and adopts** all of the findings and recommendations in this report as the reasons for making the decision to approve the modification
- **modifies** the consent approval DA 16/7153
- **signs** the attached Instrument of Modification (**Appendix B – Instrument of Modification**).

**Recommended by:**

A handwritten signature in black ink, appearing to be 'Jill Rassaby', is written over a faint, light blue rectangular stamp. The signature is stylized with a large 'J' and 'R'.

**Jill Rassaby**  
Planning Officer  
Key Sites Assessments



## 8 Determination

The recommendation is **Adopted** by:

A handwritten signature in black ink, appearing to read 'Annie Leung', with a stylized, cursive script.

**Annie Leung**

**Team Leader**

Key Sites Assessments

# Appendices

## Appendix A – Modification Report and Associated Documentation

[Modification DA 7153 Digital Advertising Sign on the M4 Homebush | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

## Appendix B – Instrument of Modification

[Modification DA 7153 Digital Advertising Sign on the M4 Homebush | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

## Appendix C – Statutory Considerations

In line with the requirements of the Environmental Planning and Assessment Act 1979 (EP&A Act), the assessment of the modification application has included detailed consideration of the matters listed under section 4.15(1) of the EP&A Act (**Table 3**) and relevant sections of the State Environmental Planning Policy (Industry & Employment) 2021 (**Table 4 and Table 5**), the Transport Corridor Outdoor Advertising and Signage Guidelines 2017 (**Table 6**).

Section 4.55(3) of the EP&A Act states that in determining the application for modification, the consent authority must take into consideration the matters referred to in section 4.15(1) of the assessment of the originally approved application (**Table 3**).

**Table 3 |** Matters for Consideration under Section 4.15 (1) of the EP&A Act

Matter	Consideration
a) the provisions of: i.) any environmental planning instrument, and	<p>The Department has considered the following relevant environmental planning instruments in the assessment of the original approved application:</p> <ul style="list-style-type: none"><li>• State Environmental Planning Policy No. 64 – Advertising and Signage (SEPP 64) (now consolidated in SEPP (Industry &amp; Employment) 2021)</li><li>• State Environmental Planning Policy (Infrastructure) 2007</li></ul> <p>The Department is satisfied that the proposed changes do not significantly alter the conclusions of the original assessment of the signage against those EPIs or any subsequent replacement EPIs.</p>
ii.) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	Not applicable
iii.) any development control plan, and	The proposed modification does alter the original assessment in relation to relevant Development Control Plan

iii.a) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	The Applicant has not entered into a planning agreement under Section 7.4 of the EP&A Act.
iv.) the regulations (to the extent that they prescribe matters for the purposes of this paragraph), that apply to the land to which the development application relates.	The Department has assessed the modification application in accordance with all relevant matters prescribed by the regulations.
(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,	The Department has considered the likely impacts of the modification application and concludes that there would be no significant environmental impacts from the modification application.
(c) the suitability of the site for the development,	The signage is permissible with consent and the proposed modification does not give rise to any permissibility issues.
(d) any submissions made in accordance with this Act or the regulations,	Councils made no submission and TfNSW has advised that they do not have any objection to the proposed modification as it stands

## State Environmental Planning Policy (Industry and Employment) 2021

The Industry and Employment SEPP currently applies to all signage that can be displayed with or without development consent and is visible from any public place or public reserve. The proposed digital signage has been assessed against the requirements of the Industry and Employment SEPP in **Table 4** and the specific assessment criteria of Schedule 5 of the Industry and Employment SEPP in **Table 5**.

**Table 4 | Industry and Employment SEPP Compliance Assessment**

Clause	Criteria	Comments	Complies?
Part 3.2 Signage Generally			
3.6 Granting of consent to signage	The signage is to be consistent with the objectives of this Policy (as set out in clause 3.1).	The modification is compatible with the desired amenity and visual character of the area. It will not alter the features of the approved signage in providing effective communication and having a high-quality finish. It is therefore consistent with the objectives of Industry and Employment SEPP.	Yes
	The signage is to satisfy the assessment criteria in Schedule 5.	See relevant assessment in <b>Table 5</b>	Yes
3.18 Location of certain names and logos	(1) The name or logo of the person who owns or leases an advertisement or advertising structure may appear only within the	The modification of Condition A2, regarding the signage logo, meets the requirements outlined in this clause.	Yes

advertising display area.  
 (2) If the advertising display area has no border or surrounds, any such name or logo is to be located:  
 (a) within the advertisement, or  
 (b) within a strip below the advertisement that extends for the full width of the advertisement.  
 (3) The area of any such name or logo must not be greater than 0.25 square metres.  
 (4) The area of any such strip is to be included in calculating the size of the advertising display area.

**Table 5 | Industry and Employment SEPP Schedule 5 Compliance Table**

Assessment Criteria	Comments	Complies?
<b>1 Character of the area</b>		
<p>Is the proposal:</p> <ul style="list-style-type: none"> <li>• compatible with the existing or desired future character of the area or locality in which it is proposed to be located?</li> <li>• consistent with a particular theme for outdoor advertising in the area or locality?</li> </ul>	The modification will not significantly alter the approved signage. The size, location and design remain the same with no proposed impact to the character of the area.	Yes
<b>2 Special areas</b>		
<p>Does the proposal:</p> <ul style="list-style-type: none"> <li>• detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?</li> </ul>	The modification will not alter the position of the approved digital advertising. As per originally approved signage, the modification will not compromise special areas.	Yes
<b>3 Views and Vista</b>		
<p>Does the proposal:</p> <ul style="list-style-type: none"> <li>• obscure or compromise important views?</li> <li>• dominate the skyline and reduce the quality of vistas?</li> <li>• respect the viewing rights of other advertisers?</li> </ul>	The modification will not alter the position of the approved digital advertising. As per originally approved signage, the modification will not compromise any significant views, the skyline or interfere with other advertisers.	Yes
<b>4 Streetscape, Setting or Landscape</b>		
<p>Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?</p> <p>Does the proposal:</p> <ul style="list-style-type: none"> <li>• contribute to the visual interest of the streetscape, setting or landscape?</li> </ul>	The modification does not propose changes in relation to streetscape, setting or landscape.	Yes

- reduce clutter by rationalising and simplifying existing advertising?
- screen unsightliness?
- protrude above buildings, structures or tree canopies in the area or locality?
- require ongoing vegetation management?

#### 5 Site and Building

<ul style="list-style-type: none"> <li>• Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?</li> <li>• Does the proposal respect important features of the site or building (or both) and show innovation and imagination in its relationship to the site or building (or both)?</li> </ul>	The modification will not alter the scale and proportion of the approved signage.	Yes
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#### 6 Associated devices and logos with advertisements and advertising structures

Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?	The modification relates to a logo change, no other devices have been altered.	Yes
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#### 7 Illumination

<p>Would illumination:</p> <ul style="list-style-type: none"> <li>• result in unacceptable glare?</li> <li>• affect safety for pedestrians, vehicles or aircraft?</li> <li>• detract from the amenity of any residence or other form of accommodation?</li> </ul> <p>Can the intensity of the illumination be adjusted, if necessary?</p> <p>Is the illumination subject to a curfew?</p>	The modification does not propose changes to the illumination of the approved digital advertising sign	Yes
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#### 8 Safety

<p>Would the proposal reduce the safety for;</p> <ul style="list-style-type: none"> <li>• any public road?</li> <li>• pedestrians or bicyclists?</li> <li>• pedestrians, particularly children, by obscuring sightlines from public areas?</li> </ul>	See relevant assessment in <b>Table 6</b>	Yes
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### Transport Corridor Outdoor Advertising and Signage Guidelines 2017

The *Transport Corridor Outdoor Advertising and Signage Guidelines* supplement the provisions of the Industry and Employment SEPP (previously SEPP 64) by providing detailed information in relation to signage within transport corridors, including design criteria and road safety considerations. The modification has been assessed against relevant sections of the Guidelines (**Table 6**)

**Table 6 | Assessment of the Signage Guidelines design criteria**

Assessment Criteria	Comments	Complies?
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## 2.5.8 Digital Sign

a. Each advertisement must be displayed in a completely static manner, without any motion, for the approved dwell time as per criterion (d) below	The proposed modification does not propose changes to the display, only the dwell time (see section d below).	Yes
b. Message sequencing designed to make a driver anticipate the next message is prohibited across images presented on a single sign and across a series of signs.	The proposed modification does not alter the advertising panels and will therefore continue to comply with the requirements for message sequencing.	Yes
c. The image must not be capable of being mistaken: i. For a prescribed traffic control device because it has, for example, red, amber or green circles, octagons, crosses or triangles or shapes or patterns that may result in the advertisement being mistaken for a prescribed traffic control device. ii. As text providing driving	The modification does not propose alterations to the digital sign that would result in it being mistaken for a traffic control device or as text providing driving instructions to drivers.	Yes
d. Dwell times for image display must not be less than: i. 10 seconds for areas where the speed limit is below 80km/h ii. 25 seconds for areas where the speed limit is 80km/h and over	The proposed modification seeks to change the approved dwell time from 45 seconds to 25 seconds. The proposed modification will continue to comply with requirements of the Signage Guidelines as stated.	Yes
e. The transition time between messages must be no longer than 0.1 seconds, and in the event of image failure, the default image must be a black screen	The proposed modification does not seek to alter transition times.	Yes
f. Luminance levels must comply with the requirements in Section 3 below.	The proposed modification does not seek to alter luminance levels	Yes
g. The images displayed on the sign must not otherwise unreasonably dazzle or distract drivers without limitation to their colouring or contain flickering or flashing content.	The proposed modification does not seek to alter advertising panels.	
h. The amount of text and information supplied on a sign should be kept to a minimum (e.g. no more than a driver can read at a short glance).	The proposed modification does not seek to alter the text or information approved to be displayed on the advertising panels.	Yes
i. Any sign that is within 250m of a classified road and is visible from a school zone must be switched to a fixed display during school zone hours.	The sign is not visible from a school zone.	Yes
j. Each sign proposal must be assessed on a case-by-case basis including replacement of an existing fixed, scrolling or tri-vision sign with a digital sign, and in the instance of a sign being visible from each direction, both directions for each location must be assessed on their own merits.	The proposed modification does not seek to alter advertising panels.	Yes
k. At any time, including where the speed limit in the area of the sign is changed, if detrimental effect is identified on road safety post installation of a digital sign,	The Applicant is aware of their requirements in relation to this criteria.	Yes

RMS reserves the right to re-assess the site using an independent RMS-accredited road safety auditor. Any safety issues identified by the auditor and options for rectifying the issues are to be discussed between RMS and the sign owner and operator.

### 3.3.2 Dwell time and transition time

a. Each advertisement must be displayed in a completely static manner, without any motion, for the approved dwell time as per criterion (b) below.	The proposed modification does not propose changes to the display, only the dwell time (see section b below).	Yes
b. Dwell times for image display must not be less than: i. 10 seconds for areas where the speed limit is below 80km/h. ii. 25 seconds for areas where the speed limit is 80km/h and over.	The proposed modification seeks to change the approved dwell time from 45 seconds to 25 seconds. The proposed modification will continue to comply with requirements of the Signage Guidelines as stated.	Yes
c. Any digital sign that is within 250 metres of a classified road and is visible from a school zone must be switched to a fixed display during school zone hours.	The sign is not visible from a school zone.	Yes
d. Digital signs must not contain animated or video/movie style advertising or messages including live television, satellite, Internet or similar broadcasts.	The proposed modification does not seek to alter advertising panels.	Yes
e. The transition time between messages must be no longer than 0.1 seconds, and in the event of image failure, the default image must be a black screen.	The proposed modification does not seek to alter transition times.	Yes