Dear BC Container Commissioner,

I am writing to you regarding the proposed changes on the truck tag policy as well as the licence application. I hope you will take the following feedback into consideration, as I have spent quite a bit of time preparing thoughtful suggestions.
I thank you in advance for your consideration.

I am not in favour of the proposed suggestion to open up the licencing period to all interested applicants. Instead, I believe it should be on a based-on licences being allotted to existing companies, that have been licenced for many years. These companies have invested more time, effort, and money into their equipment, etc., in order to be a port licensee. As an owner of a said company, it is stressful to know that in the future we may not be getting the licence if it gets more competitive by opening it up to everyone. The opening up of the licences, I believe, will cause an imbalance in the already slowing market, because companies using outside trucks(I/O) at this point, may no longer rely on them, causing certain companies/individuals to go out of business. I once again reiterate that the licences should be allotted on a priority basis to pre-existing companies with a good-standing recording with the OBCCTC.

In addition to this, I am not in favour of the splitting of tags into TLS and CTC tags, as this will create more traffic and more burden to companies that are paying their drivers hourly. These CTC trucks would have to come back to yard from off-dock instead of completing a trip from off-dock to the port. For example, if someone is going to Delco containers, we have to bring the driver back to the yard, then send another driver to Deltaport, which will take additional time, increase truck presence on the roads, and overall be a more costly procedure compared to the current procedure. I prefer to keep solely TLS tags, compared to the split up of TLS and CTC tags. I would much rather pay fees for TLS tags than have trucks with free CTC tags, as this would cost more in the long run, as well as decrease our efficiency at the port.

Also, in regard to the Vancouver Fraser Port Authority ("VFPA") performance program dictating issuance and removal of tags, I believe this should be taken in the context of a longer period of time, say the average utilization per year. One slow month, or a month with less optimal utilization due to any unforeseen circumstances should not decrease the number of tags. Rather it should be looked at perhaps on average of 6 months, or a year. In addition to this, we believe the metrics should be reflective of the company's business model. Some company

directly transport back and forth from the port to their yard with no third party involved, and thus utilize tags at a higher percentage based on the current standards used by VFPA's program. Other companies take containers from the port and deliver to a client's yard, and in doing-so, drivers are often stuck waiting to unload/load containers, and thus their time to return to the port is much longer, than a driver who is simply dropping off and picking right back up.

Lastly, we believe the methods to get truck tags should be more clear, concise, and attainable. I have looked at the 2017 recommendations of the truck tag system from the Cascadia Partners, and agree with a majority of their findings. In particular, "TLS Licence Holders should not be inhibited from growing their business and managing their own long-term business risks" quoted directly from the executive summary. The truck tag procedure should be optimized in the sense that it should allow existing licensees to expand their business and increase their tags as needed due to increases in businesses.

I hope you take this feedback into consideration.

Thank you,
Jas Sidhu