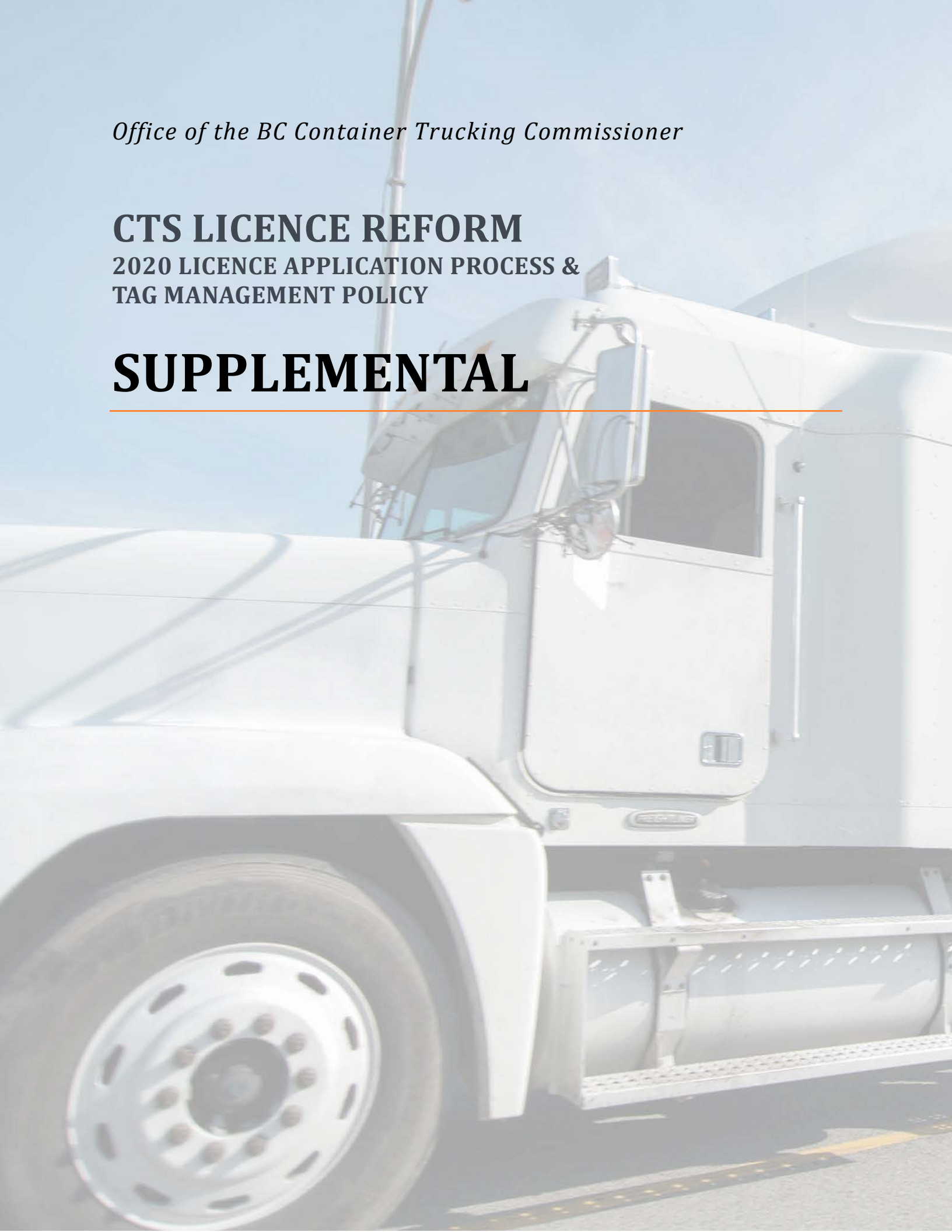


Office of the BC Container Trucking Commissioner

CTS LICENCE REFORM
2020 LICENCE APPLICATION PROCESS &
TAG MANAGEMENT POLICY

SUPPLEMENTAL





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Introduction

On November 12, 2019, the OBCCTC issued a 2020 Licence Application Process & Tag Management Policy consultation document that outlined a proposed, revised licencing scheme which better addresses truck tag policy and OBCCTC enforcement of the legislative scheme. The consultation document includes a summary of the proposed policy changes and an annotated copy of the proposed new Truck Tag Policy and Container Trucking Services (“CTS”) Licence (the “Licence”).

Following release of the consultation document, the OBCCTC began a series of stakeholder consultations with licensees, drivers and industry participants. The proposed amendments to the 2020 Licence Application Process & Tag Management Policy consultation document contained in this supplemental document arise from these consultations and are outlined here for stakeholder discussion and comment. This supplemental document should be reviewed in conjunction with the initial consultation document released in November 2019, but this supplemental document is intended to take priority in the event of any conflict between the two.

As noted previously, a final licence package and Truck Tag Policy will be issued in the spring of 2020, prior to the conclusion of the current licence term.

The comment period for all proposed amendments to the Licence and Tag Management Policy remains open until the end of the day on February 28, 2020. Submissions can be sent to the OBCCTC at the following email address: registrar@obcctc.ca.

Submissions will be posted on the OBCCTC website.

Summary

The OBCCTC is considering the implementation of the following **additional** changes to the 2020 Licence Application Process & Tag Management Policy consultation document:

1. Additional Truck Licensing System (“TLS”) Truck Tags granted by the OBCCTC to applicants must be assigned to trucks that meet the Vancouver Fraser Port Authority’s (VFPA) TLS requirements. **NOTE:** The TLS-approved trucks of current licence holders who do not apply for a 2020 CTS Licence will exit the TLS at the end of the current licence term;
2. Addition of a National Safety Code Carrier Profile Report as a mandatory licence application requirement;
3. Update to the Licence application evaluation criteria;
4. Removal of the Provisional TLS Tags clause;
5. Update on the TLS tags target;
6. Designation of an annual additional tag application period; and
7. Introduction of a requirement to supply business case for CTC Tags.

NOTE: For clarity, the OBCCTC has amended the “Minimum Number of Trucks” criteria in the 2020 Licence Application Process & Tag Management Policy consultation document proposed “Mandatory Licencing Criteria” table. It is proposed that applicants for a CTS Licence must have at least ten trucks, either company-owned and/or sponsored, that are eligible to receive a **TLS** truck tag.

CTS Licence Criteria

TLS Approved Trucks

The OBCCTC is aware that under the proposed licence criteria, companies with fewer than 10 trucks that qualify for a TLS truck tag are not eligible to apply for a new licence. This may result in some attempts at licence consolidation in the industry. Applicants should be advised that any licensee owned TLS-approved truck which is acquired by another licensee will exit TLS at the end of the current licence term. Any additional TLS truck tags assigned to a licence applicant during the licensing process must be assigned to trucks that meet the VFPA's TLS requirements.

Addition of a National Safety Code Carrier Profile Report as a mandatory licence application requirement

The *Container Trucking Regulation* (the "Regulation") requires all drivers performing on and off dock container trucking services be paid regulated rates. During the course of audits, the OBCCTC has discovered that some licensees have been operating exclusive, untagged off dock fleets in addition to their tagged trucks that access the Port. It is a requirement of the *Container Trucking Act* (the "Act") that all trucks performing container trucking services (on and off dock) are tagged. The National Safety Code Carrier Profile Report contains detailed information about the composition of a carrier's fleet which will enable the OBCCTC to better identify all trucks that fall under the jurisdiction of our office.

In addition to providing the OBCCTC with a declaration of all trucks performing on and off dock services, it is proposed that applicants provide a copy of sections 1-3 of their most recent National Safety Code Profile Report and clearly identify all vehicles listed in section 3 that are performing on and/or off dock container trucking services.

Updated Licence evaluation criteria

The 2020 Licence Application Process and Tag Management Policy consultation document contained a draft evaluation matrix. Stakeholders have requested additional information about how the OBCCTC intends to review, evaluate and approve applications for both existing Licensees and new applicants.

The OBCCTC recognizes that adding past compliance history as a scored factor gives new licence applicants an advantage because they have not been subject to regulatory oversight by the Commissioner. New tag applicants also may not have guaranteed business contracts and will not have performance measures which will be a required factor for business cases submitted by existing licence holders.

The OBCCTC proposes that the applications of existing licensees be reviewed and assessed prior to the evaluation of new applicants and that licences and tags be allocated to new applicants only if the TLS tag target has not been exceeded following the assignment of TLS tags to existing licensee applicants.

The following application evaluation criteria is proposed:

Licence Evaluation Criteria (Mandatory)

Licence Criteria	Criteria Met
Minimum number of TLS trucks requirement met	Y/N
Proposed TLS tagged trucks meet VFPA requirements	Y/N
Security requirement met	Y/N
Insurance requirement met	Y/N
Union affiliation requirement met	Y/N or N/A
Workers' Compensation Board requirement met	Y/N
National Safety Code Carrier Profile Report requirement met	Y/N
Declaration of all drivers and vehicles to be performing on and off dock container trucking services	Declaration complete and submitted in prescribed format
Vehicle ownership Confirmation	Declaration complete and submitted in prescribed format
I/O Sponsorships (if applicable)	Sponsorship applications complete and submitted in prescribed format for each eligible I/O (one sponsorship per truck)

Tag Evaluation Criteria

Tag Request Business Case (TLS & CTC tags)	<p>The OBCCTC will assess an applicant's request for TLS and CTC tags based on the quality, relevancy and completeness of the submitted business case. Specific criteria that will be considered are:</p> <ul style="list-style-type: none"> Detailed explanation of the nature and type of business provided by the applicant Planned use and implementation plan for the requested tags An analysis of the estimated impact of the requested tags on current and anticipated fleet efficiency and performance metrics Verifiable documentation from current or future customers attesting to the container volumes cited If additional tags are being requested, an explanation why current volumes are difficult to service and measures taken to address capacity shortfalls (i.e. sub-contracting, slip seating etc.) Evidence to demonstrate that the applicant has a strategy or has taken steps to acquire and sponsor requested I/Os, and/or company trucks to fill the requested tags Description of all container trucking services provided or to be provided by the applicant including on/off dock and ancillary movements that attract regulated rates Signed contracts and/or letters of support from customers, shippers and union/bargaining agents (if applicable) in support of the requested licence and tag allocation Other relevant information/documentation the applicant feels should be considered in support of the application
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<p>Compliance History of Prior Licensees</p>	<p>An applicant’s compliance history will be reviewed and assessed for the purpose of assigning TLS truck tags. Specific criteria that will be considered includes:</p> <ul style="list-style-type: none"> • past audit results and compliance with orders arising from a decision • responsiveness and level of cooperation during the audit process including quality and timeliness of record submissions and auditor requests for information • amount of administrative penalty (ies) imposed for proven violations • frequency of audits and/or investigations arising from and/or involving driver complaints versus randomly selected audits initiated by the OBCCTC • level of seriousness and intent cited in audit reports and decisions involving substantiated violations of the <i>Act, Regulation</i> and/or Licence • demonstrated effort to correct and/or failure to correct defects identified during the course or following an audit and/or decision
<p>Fleet Utilization and Efficiency of Prior Licensees</p>	<p>An applicant’s fleet utilization over the past 12 months will be assessed for the purpose of assigning TLS truck tags using balanced scorecard information and data supplied by the VFPA. Specific criteria that will be considered includes:</p> <ul style="list-style-type: none"> • average on dock trips per day for each month as compared with the industry average for the same time period • average on dock trips per day for each month as benchmarked against peers¹ • distribution of average on dock trips per approved truck per day • terminal reservation activity • fleet utilization

Licence Assessment process

Applicants who currently hold or have held a licence in the past are not guaranteed a licence and must meet the mandatory requirements. Failure to meet the mandatory requirements will result in a rejection of the application. The number of TLS and CTC tags allocated to a licence will be assessed by applying the criteria specified above. The OBCCTC will also consider an applicant’s current tag allotment and fleet composition (company and I/O tags) in relation to the request (i.e. is the applicant asking for a higher/lower number of tags) and any target that may be imposed on the overall fleet size when allocating the number and type of tags (company or I/O) to applicants who are granted a Licence.

¹ Small fleets 10-20 TLS tagged trucks, medium fleets 20-30 TLS tagged trucks and large fleets 31+ TLS tagged trucks.

CTS Licence Tag Management Policy

Provisional TLS Tags Clause

The OBCCTC is proposing to remove the Provisional TLS Tags clause in the Tag Management Policy. To date, very few Provisional Tags have been requested or issued by the OBCCTC. In the few cases where the OBCCTC has issued a Provisional Tag, the duration of the driver absence has always exceeded 90 days and in each case, a return date for the driver has been open ended. As a result, the tracking of these tags becomes administratively difficult.

Rather than issue Provisional TLS Tags, the OBCCTC proposes that in circumstances where licensees have a need to accommodate an I/O leave of absence, due to extraordinary circumstances, that has exceeded or is expected to exceed one month in duration, the OBCCTC place the I/O on "Inactive" status on the I/O List and, in the event the I/O returns to the industry and/or their previously sponsoring licensee, consider the issuance of a new TLS Tag.

TLS Tag Count Target

Drivers, licensees and other industry participants continue to advise the OBCCTC that the number of trucks performing on dock container trucking services exceeds the available work opportunities and that this has, in part, contributed to past work stoppages and to past and present rate undercutting.

Statistical data provided by the VFPA demonstrates a significant trend in the drayage sector over the last 10-year period. While the number of twenty-foot equivalent units ("TEU's) has grown steadily year over year since 2009, reaching just over 3.4 Million TEU's, there has been a significant change in the mode of transport. The growth in TEU volumes transported by drayage truck has remained relatively modest, having grown by approximately 20% over the last 10-year period. Whereas, the number of TEU's moving via other modes of transportation has surpassed the volumes moving by truck and has grown by almost 80% during the same period.

Factors such as the completion of the Deltaport Terminal Road & Rail Improvement Project during 2019, have contributed to this trend as significant drayage services that were routinely used to supplement Deltaport's rail services during construction are no longer required.

As a result, of the above and other industry and economic factors, there continues to remain a significant over supply of drayage trucks in the sector competing for TEU volumes that are increasingly relying upon intermodal services. This imbalance, if unaddressed, will lead to further industry instability as competition within the drayage sector intensifies. Further efficiencies and optimization within the drayage sector such as short haul shipping, industry consolidation and double-ended moves will bring added pressures upon driver income if the number of drayage trucks isn't more closely aligned with present and future TEU volumes.

The OBCCTC recognizes that most fleets perform both on and off dock movements and that measuring on dock performance exclusively does not account for off dock movements and other ancillary work. Additionally, it is recognized that other factors beyond the control of licensees can affect their overall performance and efficiency. These factors include terminal operations and reservation system challenges and traffic issues. The on-dock measure does, however, serve as a useful guide in determining the optimal size of the fleet that is required to meet the business needs of the Gateway.

The OBCCTC is proposing that an overall target number of TLS tags issued during the licensing application process be set with the goal of improving Gateway efficiency and increased work opportunities for drivers. The target number of trucks will be determined following additional consultation with stakeholders and will be published in the final licensing package to be issued in April 2020.

Additional Tag Applications

The OBCCTC is proposing to only accept additional tag applications annually, subject to the Commissioner's discretion to choose to accept them more often. Since the introduction of the first tag policy, the OBCCTC has accepted additional tag applications throughout the term of the licence. Increasingly, however, the OBCCTC has found that many applicants are altering their dispatch practices in order to manipulate performance data results and demonstrate increased trips per day before submitting applications. An annual tag application period will allow the OBCCTC to better assess fleet performance and compare performance against historic fleet specific and industry wide trends. It will also allow for more certainty in licensee business planning.

The OBCCTC proposes setting an annual fixed application period (at time of licensing and once during the term of the Licence) to accept new tag applications. This will allow for longer term planning and a more accurate performance evaluation when reviewing and granting additional tags. The OBCCTC would continue to issue additional truck tags throughout the term of the licence at its discretion and in exceptional circumstances.

Requirement to supply business case for CTC Tags

In the 2020 Licence Application Process & Tag Management Policy consultation document, the OBCCTC stated that CTC Truck Tags would be issued to applicants at their request and that the OBCCTC would “grant all CTC truck tag requests and it would be the responsibility of licence holders to ensure that all trucks performing off dock container trucking services under a licence be tagged.” Some stakeholders have raised concerns that the issuance of CTC Truck Tags upon request could lead to unnecessary growth in the size of off dock fleets resulting in increased road and facility congestion, the continued use of older trucks and the potential for TLS tagged truck drivers to lose work to CTC tagged truck drivers.

The proposed new licence criteria already require licensees to declare all tagged (TLS and CTC) vehicles and drivers under licence. It is anticipated that this requirement will assist in ensuring that licensees only request CTC Truck Tags for existing, untagged off dock trucks rather than asking for more CTC Truck Tags than necessary.

To further strengthen the process and guard against unnecessary increases in the number of off dock trucks across the licenced fleet, the OBCCTC is proposing to amend the business case requirements in the Tag Management Policy to require applicants to account for off dock container trucking services activity and business when requesting CTC Truck Tags.

Proposed CTS Licence Truck Tag Policy (additional conditions in blue, previous in red)

PURPOSE

This is the policy of the Office of the BC Container Trucking Commissioner (the “OBCCTC”) on the issuance, withdrawal and management of truck tags assigned to Licensees. It is consistent with the purpose of the *Container Trucking Act* and *Container Trucking Regulation* (“the Legislation”) and is intended to balance the number of trucks with the volume of container movements in the sector generally, and, more specifically, encourage the movement of drivers to high performing companies.

Under this policy, the OBCCTC issues TLS truck tags (for trucks that require access to a marine terminal) and CTC truck tags (exclusively for trucks that only perform off dock container trucking services).

Licensees and current and prospective Independent Operators (“I/Os”) must follow this policy when applying for additional tags, moving Sponsorship/Joinder, or seeking to be added to the I/O List.

AUTHORITY

In conjunction with the legislation, the Container Trucking Licence (the “Licence”) establishes the authority of the Container Trucking Commissioner (the “Commissioner”) to determine the number of truck tags associated with the Licence and impose conditions upon the Licensee.

PRINCIPLES

The following principles will apply in the application of this policy:

- Truck Tags are assigned to a licensee and not to individual I/Os.
- Truck Tags are not transferrable in the event of a change in control or sale of a licensed company.
- Licensees are accountable for ensuring that tagged trucks are performing container trucking services as defined by the legislation.
- Conversion of a company tag to an I/O tag during the term of the Licence is not permitted.
- Conversion of an I/O tag to a company tag during the term of the Licence is not permitted.
- Truck tags have no monetary value and cannot be explicitly or implicitly or directly or indirectly assigned, transferred, shared, traded, bought or sold.

CRITERIA

The Commissioner considers a Licensee's **on-dock** performance metrics (including those under the VFPA's performance review program) and the size and performance of the I/O fleet under Sponsorship/Joinder when issuing and withdrawing additional **TLS tags**. **CTC tags will be assigned to licensees upon review of the applicant's business case.**

POLICY

1. **The number of authorized tags assigned to a licensee may vary throughout the term of the Licence.**
2. **The Commissioner will review and determine the number of TLS tags to be allocated to each applicant under an approved Licence based upon information provided by the VFPA, including a performance review that identifies, in part, the number of on and off dock trips per day conducted by each TLS tagged truck.**
3. **The Commissioner may consider any other matters that the Commissioner in his or her discretion may consider relevant to the performance review.**

TLS & CTC Tag Application Process

4. **A Licensee will not be granted additional TLS or CTC tags if there is an active audit or investigation being conducted by the OBCCTC.**
5. **Licensees may only apply to increase the number of TLS or CTC tags authorized under its Licence at time of licensing and once during the term of the Licence. ~~at any time throughout the term of the Licence unless otherwise suspended. Licensees must complete the Additional TLS Tag Request Form and submit supporting documents.~~**
6. **To qualify for ~~additional~~ TLS and CTC tags, Licensees must provide a business plan detailing all of the following:**
 - The planned use of the ~~additional~~ **TLS and CTC** tags;
 - The estimated impact of ~~additional~~ tags on the performance metrics of a Licensee's existing tag allotment; and
 - A schedule for the implementation of the ~~additional~~ **TLS and CTC** tags.
7. **The business plan must also demonstrate ~~or include~~ one or more of the following:**
 - **That existing business is difficult to service due to the high utilization of the current ~~fleet TLS tag allotment~~ **with evidence to support:**
 - **An increase in the number of containers being transported per month for at least the three months preceding the application,**
 - **Analysis of the capacity within the fleet and the required number of tags needed to move the increased container volume, and**
 - **Sustained use of third party or sub-contracted services;****
 - **Verifiable documentation that a current customer has increased its container movement volume;**
 - **Signed contracts demonstrating that new business has been secured necessitating additional capacity;**

- An Independent Operator has indicated, in writing, support for the additional **TLS or CTC** truck tag application on the basis that the granting of an additional **TLS or CTC** truck tag will result in their sponsorship;
 - **A letter of support from a union/bargaining agent (if applicable) and/or,**
 - **Any other evidence, criteria or information that the Commissioner may consider relevant.**
8. **The business plan may include an analysis of company truck and/or I/O truck trips/movement records to accurately assess the number of on and off-dock trips per day undertaken by the applicant's drivers and/or I/Os.**
 9. Additional tags will be issued subject to the Licensee's adherence to the terms and conditions of the VFPA's Access Agreement and **its past and ongoing compliance with the Licence and the legislation.**
 10. Licensees will be advised of the Commissioner's decision in writing. If approval is granted for a **TLS Truck Tag**, the Licensee must then inform the VFPA and secure approval to add a truck within **45** days of the date of the Commissioner's written approval or the approval will automatically expire, unless consent is granted in advance by the OBCCTC to extend the timeframe (**NOTE: The TLS approved trucks of previous licence holders exit TLS at the end of the 2018 CTS Licence term**).
 11. **A Licensee is responsible for ensuring its security (bonding) requirements under the Licence and Regulation are met based upon the number of TLS and CTC tags assigned to the Licence. A Licensee is also responsible for paying all Truck Licensing Program fees associated with an increase in its TLS truck tag allotment if applicable.**

Provisional TLS Tags

- ~~12. Licensees may also apply to the Commissioner for a 90-day temporary **TLS tag** ("Provisional TLS Tag") to accommodate an I/O leave of absence, due to extraordinary circumstances, that has exceeded or is expected to exceed one month in duration. The Provisional TLS Tag will automatically expire after 90 days, unless terminated earlier or extended as a result of a Commissioner approved request for extension by the Licensee, both at the discretion of the Commissioner.~~

TLS Tag Withdrawal Process

13. Approval of additional TLS truck tags is subject to a Licensee maintaining the performance metrics associated with all the TLS truck tags assigned to it under its CTS Licence as well as its performance requirements under the VFPA's Access Agreement. Failure to maintain performance may result in a reduction of the number of TLS truck tags under the Licence.
14. The Commissioner will review the performance levels of all Licensees and withdraw TLS tags from Licensees not maintaining TLS tag performance and/or evidencing a prolonged decrease in TLS tag performance and container movement volumes.

15. In conducting its performance review, the OBCCTC will examine and compare the performance of licensees within the following groupings based on the size of a licensee's TLS tagged fleet and its performance within the grouping:

- a. Small Sized Licensees 10-20 trucks
- b. Medium Sized Licensees 20-30 trucks
- c. Large Sized Licensees 31 + trucks

16. The Commissioner will utilize the Licensee's Balance Scorecard as issued monthly by the VFPA, as well as and any other information that the Commissioner may consider relevant to evaluate licensee fleet performance. This may include any information provided by a licensee regarding its fleet performance.

17. Should the Commissioner consider reducing the number of TLS tags under a Licence, the Commissioner will provide the licensee with a warning and a 90-day opportunity to improve TLS tag performance, which is detailed on the Licensee's Balanced Scorecard. If, after 90 days, TLS tag performance has not improved, the Licensee will be given reasonable notice of the Commissioner's intention to withdraw the TLS tags.

18. Licensees may voluntarily surrender tags at any time. The VFPA may amend Access Agreement charges to reflect Licensees who voluntarily surrendering TLS tags or when TLS tags are removed.

19. Any TLS tag that has remained vacant for longer than 90 days will be removed from the Licensee.

CTC Tags

20. Licensees must declare to the OBCCTC and maintain an up-to-date accounting with the OBCCTC of all company owned trucks exclusively performing off-dock container trucking services.

21. Licensees must provide to the OBCCTC a signed sponsorship form for all I/Os exclusively performing off-dock container trucking services using a CTC tagged truck under licence.

~~22. Licensees may apply for CTC tags authorized under its Licence at any time throughout the term of the Licence. Licensees must complete and submit the CTC Tag Request Form to the OBCCTC.~~

~~23. Any CTC tag that has remained vacant for longer than 90 days will be removed from the Licensee.~~

Independent Operator List

24. The Commissioner's I/O List (the "List") is intended to increase sponsorship opportunities for I/Os. When seeking sponsorship, I/Os must advise licensees about their status on the List. Licensees seeking to sponsor I/Os may also contact the OBCCTC to confirm an I/O's status on the List.

25. Status on the I/O List is associated with an individual, not with a tag. **Tags do not move between Licences.** I/O's cannot transfer their place on the I/O List to another I/O.

26. An I/O shall not perform container trucking services on behalf of any Licensee unless the I/O is on the I/O List.

27. Licensees shall only sponsor and join to I/Os on the I/O List.

28. In order to ensure the objective of this policy and the integrity of the I/O List, and avoid the forced conversion of I/Os to employees, in accordance with Appendix A to Schedule 1 of the Licence (“Prohibited Practices”) a Licensee must not require an I/O to sell his or her Equipment (as defined in the Licence) to the Licensee.

29. The maximum number of I/Os on the I/O List is set by the Commissioner and is reviewed monthly and adjusted as necessary at the discretion of the Commissioner.

30. The I/O List is comprised of three types of I/Os: Active I/Os, Eligible I/Os, and Inactive I/Os.

- Active I/Os

An Active I/O is an I/O who is working under an active Sponsorship/Joinder.

Active I/Os on the I/O List may move to a new Sponsorship/Joinder **if the receiving Licensee has a vacant tag and the previous Sponsorship/Joinder is severed.**

- Eligible I/Os

An Eligible I/O is an I/O who is not working under an active Sponsorship/Joinder and is available to Licensees for Sponsorship/Joinder.

I/Os remain on the I/O List as Eligible I/Os for a maximum of 90 days from the date of termination of a Sponsorship/Joinder.

If an Eligible I/O does not become an Active I/O within the 90 days, the Eligible I/O will be removed from the I/O List.

The associated TLS approved trucks of Eligible I/Os will not be deemed by VFPA to be exiting TLS ~~as of January 1, 2018~~; however, the trucks remain subject to TLS requirements.

~~Subject to the discretion of the Commissioner, it is anticipated that approximately 10% of the I/O List will be comprised of Eligible I/Os.~~

- Inactive I/Os

An Inactive I/O is a Sponsored/Joined I/O who is unable to perform container trucking services due to a temporary recess of the Licensee’s tag by the Commissioner (ex. as the result of a bargaining unit grievance process).

New I/O List Applicants

31. The Commissioner will monitor the I/O List and, if satisfied that it is desirable to add new Eligible I/Os to the I/O List, will publish a request for applications.

32. Applicants must complete an application and demonstrate that they have 5 (five) or more years of experience in providing local drayage and/or long haul (highway) container trucking services.

Applicants must also declare that they are aware of and will meet the following conditions within 60 days of receiving written confirmation they have been added to the List:

- Acquire a compliant vehicle that meets or exceeds the Vancouver Fraser Port Authority (“VFPA”) truck age requirement;
- Secure a Sponsorship/Joinder agreement with a licensee that has a vacant tag; and
- Obtain VFPA Truck Licensing System approval.

33. Should the number of applicants exceed the number of advertised spaces, the successful applicants will be determined by a lottery.
34. ~~If a successful applicant is unable to meet the conditions outlined in section 28 within 60 days of being added to the List, he/she must write to the Commissioner and the Commissioner may grant an extension. Successful applicants will be notified in writing and will have 60 days from the date of the written notification to acquire a compliant vehicle, secure a Sponsorship/Joinder with a Licensee that has a vacant tag and secure VFPA TLS approval, unless consent is granted in advance by the OBCCTC to extend the timeframe.~~
35. ~~Subject to the discretion of the OBCCTC, any applicant seeking to be placed on the I/O List must not have been a company employee of a Licence holder in the three months prior to being placed on the I/O List.~~

General

36. Licensees may apply for additional tags to: registrar@obcctc.ca
37. Licence holders may apply to fill vacant TLS tags and submit new I/O Sponsorship/Joinder applications through the OBCCTC and the VFPA TLS. **CTC tag and associated new I/O Sponsorship applications are only to be submitted to the OBCCTC.**
38. Placement on the I/O List is solely for the purpose of the proper administration of this policy and is in no way an approval or endorsement by the Commissioner of the I/Os on the I/O List. Further, placement on the I/O List does not represent confirmation that the I/O’s truck meets the VFPA’s TLS requirements.
39. Placement on the I/O List does not guarantee an I/O Container Trucking Services work of any kind.
40. All references to timeframes and deadlines in this policy are subject to the discretion of the Commissioner.
41. Except as defined herein, capitalized terms in this policy have the same meanings as defined in the Licence.