



# Super Star Trucking Ltd.

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Dear OBCCTC,

February 13 2020

This is a letter regarding the newly suggested changes within the License Reform Package issued on November 12 2019. To give a little background on our company, we have been conducting drayage business for 21 years. Our company has always been centered around providing excellent and efficient service to our customers within the container industry.

While going over the package I noticed a few points that we disagree with. The first one being the minimum requirements for a company to receive a CTS License in the new system. We feel that this rule about how many trucks are required in order to qualify to receive this license should not be a factor that needs to be considered. We believe that every company that is legally registered and is currently in the TLS system should all be granted an automatic renewal of their license if they wish to apply. We also believe that the only factor that should be considered is how many tags the company will receive; this consideration should be based off of the performance and projected increase in business. We do not feel it is fair for companies that have been operating for several years be suddenly removed from the TLS system because they do not possess enough tags. The current classification of fleet sizes should also be reconsidered. The amount of tags a company has should not matter at all, whether it is one or one hundred tags every company should have the right to continue conducting container services through all the ports in the Lower Mainland. Most companies within the container industry are driven on getting containers in and out of the port. Having to replace business through an alternate method of trucking will be nearly impossible.

Secondly, we would like to cover the proposed process of receiving additional tags. We agree with majority of the layout but there were a few points that stood out which we would like to touch on. First the point of wanting companies to have "an increase in the number of containers being transported per month for at least the three months preceding the application", this would be very difficult to do for some companies including ours due to some customers only having bookings that range from ten to fifty containers. It would be impossible to take on more business without causing issues for the current volume a company hauls. If a company is able to demonstrate that they have an increase of potential business they should be entitled to receive more tags, followed by a trial period to see if the company's business has grown and the company is making adequate use of the additional tags given. Having to hire a third-party contractor does not end up being beneficial in most cases because often times you end up taking a loss on a contractor.



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Next, we would like to touch on joint companies. We rely on the truck power between our two companies to be able to accommodate to our customers needs. Companies that have been previously approved for the license they currently posses with joint applications should be strongly reconsidered for approval and have the new license granted to them. A joint license holder should not be solely punished and looked down upon for possessing such license. They should be considered for renewal just as a company without a joint application is considered.

We are also wondering what has caused the commissioner to think companies with less than ten tags should not be considered for the license renewal and what basis and statistics was this number calculated by? If companies do get approved will this number increase in the future when licenses need to be renewed again?

Having the opportunity to conduct business for 21 years and thinking about the effect of potentially not getting our license approved is frightening. Denying a company that is applying for the new license would not only affect the owners, but also all of the employees that are involved. Every company removed from the TLS system would lose their entire business, turning their assets into liabilities and every single family within the company would be greatly affected. All of our employees rely on us to provide cheques for their monthly bills and have their family relying on them to provide for the household are now facing the potential of losing their income. Losing our license would greatly affect my family as well. I am the sole source of income for a household of seven people. I have very young children who still have a life time ahead of them

Overall, we feel as if the new license plan is catered around large companies and is set out to destroy small companies, this entire process should be fair for all companies involved no matter what size they are. We truly do believe that everyone in the container industry deserves a fair license renewal. If you have any questions or comments, please do not hesitate to call us at (604) 587-5544.

We appreciate you taking time out to read our thoughts and hope you take our points into consideration.

Regards,

Harinder Chohan  
Super Star Trucking Ltd.