



# GOODRICH TRANSPORT LTD

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February 26, 2020

The Office of the BC Container Trucking Commissioner  
1085 Cambia Street  
Vancouver, British Columbia V6B 5L7

RE: CTS Licence Reform Submission – (CTS Licence Reform: 2020 Licence Application Process & Tag Management Policy)

Dear Mr. Crawford,

Thank you for the opportunity to provide our comments regarding the proposed changes to the CTS License for 2020 and thank you in advance for your consideration of the following submission.

Upon review of the CTS Licence Reform: 2020 Licence Application Process & Tag Management Policy, Goodrich transport & Royal team Canada transport does not support the proposed changes.

Increase to the Minimum Truck Requirement Under the proposed policy, it is mandatory for all applicants to have a minimum of 10 trucks (company-owned or sponsored) that are eligible to receive a truck tag. This is an increase of 5 trucks (or 100%) from the previous minimum truck requirement. The reasoning is not clear for the need to increase the minimum requirement to 10 trucks? Company should be allowed the truck's as per business requirements and we don't believe that any company would be buying over or less fleet their business required.

The increase to the minimum requirement puts the livelihood of the existing licensees that will not meet the new requirement at risk. Licensees have invested a significant amount of time, resources, and money into their business to progress towards/maintain its compliance with current policies and to develop its business case for more truck tags. Most of the smaller companies own their trucks and trailers vs larger companies.

I would also like to talk about joint companies, we do rely on trucks power to accommodate the customer's needs. Since there are some companies approved previously as a joined licence which don't meet the 5 trucks minimum requirement, they should be grandfathered as approved previously.

The Licence should be granted for minimum 5 years instead of 2 years.

We hope you take this feedback into consideration.

Sincerely,

Sucha Seikhon  
Goodrich Transport Ltd