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February 28, 2020

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

Email: registrar@bcctc.ca

Dear Commissioner:

Re: CTS License Reform 2020 License Application and Tag Management Policy

On behalf of Unifor Vancouver Container Truckers' Association (Unifor VCTA), please accept the following submission and thank you for allowing us the opportunity to provide our comments regarding the proposed changes to the CTS License for 2020.

Below we have outlined some of primary concerns and our opposition to certain areas of the proposed policy.

Proposed TLS Application Process

The TLS Truck Tag Business Plan application should include mandatory information regarding the utilization of the requested tag allotment with evidence to support the application. Below are some points that have been listed in the policy as optional information that can be submitted, but not required. Our position is that they should be made as part of the application process.

- Documentation that demonstrates the utilization of the requested tag allotment with evidence to support:
 - The number of containers being transported per month for at least three months preceding the application, and

- Analysis of the capacity within the fleet and the required number of tags needed to move the stated container volume.
- The business plan will include an analysis of company truck and/or I/O truck trips/movement records accurately assessing the number of on and off-dock trips per day undertaken by the applicant's drivers and/or I/Os. The suggested change provides what Unifor believes to be good business practice.
- NSC compliance and an obligation on part of the applicants to establish that they are in good standing should also be added as part of the mandatory elements of the application process.

New CTC Tag

Unifor VCTA is opposed to the introduction of a new CTC Tag. We do not support the establishment of a dual truck tag system through the creation of the CTC (off-dock only) truck tags due to the following reasons:

- On the surface, the creation of a new tag system may seem as corrective measure to address issues around correct pay for off-dock moves and provide a more open system for tracking these types of movements. However, Unifor VCTA believes that the new tag does not adequately address these issues. We believe it will simply create more division, abuse and a reduction in pay driving groups.
- The addition of CTC tags will result in higher security requirements associated with the TLS License – creating a disincentive to use the required TLS tags for on and off-dock moves. This reduction will lead to a decrease in pay for drivers that currently perform both on and off-dock moves to help subsidize or top-up pay on days where there is a reduced amount of on-dock moves.
- The introduction of a new tag system will lead to an overall increase of drivers on the road doing off-dock moves, as it creates a restrictive class of drivers that can only do certain moves.

June 2020 Open License Period

Unifor VCTA is not in favour of the proposed suggestion of opening up the licensing period to all interested applicants. We believe it should be based on licenses being allotted to existing companies that have been licensed for many years. The opening up of licenses will cause imbalances due to an influx of more companies entering an already slowing and bloated market.

Container Trucking Services License

The proposed license agreement deletes definitions that include the Lower Mainland and Marine Terminal. Deleting these definitions will lead to an increased risk of inaccurate interpretations or applications of these definitions.

We thank you again for taking the time to review our submission and considering our recommendations. We would be more than happy to discuss these in further detail with you at your earliest convenience.

Sincerely,



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Paul Nagra, President VCTA