

From: [Canstar trucking](#)
To: [Registrar, CTC CTC:EX](#)
Subject: CTS License Reform Submission
Date: February 13, 2020 5:15:27 PM

Dear Mr. Crawford,

I appreciate your consideration for allowing us to participate in this discussion about the proposed change in the Truck Tag and CTS License policies.

We are a TLS licensed company serving the ports of Vancouver since 2001. Our customers are happy with our services and our employees are satisfied to work for us.

In your new policy reform, I have many concerns about how the policy will affect small companies in the trucking industry. Primarily that the policy will directly impact the livelihood of small companies like us and our employees. Also, our customers and contractors will be impacted with the proposed changes. I have listed some of the issues below:

1. The minimum requirement from 5 trucks to 10 trucks makes our company non-eligible to apply for a new license. Therefore, increasing the minimum requirement for the number of trucks will cause many small companies to go out of business regardless of being fully compliant and having good performance measures. If our company does not meet the minimum number of trucks' criteria, are you planning to give out more tags to make us eligible?
2. I disagree with the application for additional tags being allowed once annually. This makes it hard to grow business.
3. The license term of two years is very short for the companies to invest into equipment, land, and make long-term commitments with various contractors.
4. The performance metrics are not reliable and clear enough in showing the amount of work performed by a company. For example, if a small company has customers most often serving Fraser Surrey Docks and picking up containers from off-dock facilities, the impact on performance metrics is minimal. This is because off-dock facilities and Fraser Surrey Docks are not included in the Port of Metro Vancouver performance metrics.
5. The new policy is not supporting small carriers.
6. We disagree with the fee structure. As a small carrier, we are paying almost double the fees than the large carriers pay. This makes it hard for us to compete with other companies in the industry. We pay \$5,000 per tag as compared to \$2,750 paid per tag for large carriers.

--

Regards,

Canstar Trucking Co. Ltd.

Dispatch 604 597 5040

Fax 604 597 5048

Owner - Harinder 778 882 4237 cell

canstartrucking@gmail.com

www.canstartrucking.com