



February 28th, 2020

RE: Truck License Renewal 2020
ATTN: BC Container Trucking commissioner

Good afternoon Mr. Crawford,

We have had the opportunity to review the commissioner's package and requirements set out in the proposed license.

I do not agree with the following changes:

- Increasing the truck requirement from 5 trucks to 10 trucks.
- Using prior compliance records to determine the number of truck tags allotted to a licensee.

By increasing the minimum truck limit, it will impact the small carriers as they will not be able to offer trucking services or operate within the industry. The negative impacts of this decision will lead to 13% of the industry trucks removed from the system. Drivers and owner operators will have to look for new opportunities which will be extremely rare as the container drayage industry has been extremely slow for the last two quarters.

Additionally, this will have a personal affect for companies operating as they will be forced to shut down, since the equipment such as day cab tractors and chassis are not suitable for any other industry in the lower mainland, and will lead to bankruptcies.

Furthermore, prior compliance shall not be used to determine the number of tags allotted, since the companies have brought themselves to be compliant TODAY, so the commissioner should use live data from today or the past 90 days to determine the fleets business case and utilization to allot tags, since utilization and stability in the industry can be only driven from a successful operation

Sincerely,

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