



Seaville Transport Logistics
16268 River Road
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February 28, 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, Seaville Transport Logistics does not support the proposed changes.

- The prohibition of joint licences; - An increase to the minimum truck requirement for licensees from five to ten; There are companies that have been doing port business all their life and now being kicked out without any reason.

- The June 2020 licence period to be opened to all interested applicants;
As per your conversation we already too many truck tags and at same time you are opening applications to new companies. Most of the companies are asking you for more tags including Seaville. I have requested for more tags few times and did not get any. I have drivers working close to 13 hours every day.

- Assignment of either an on-dock (TLS) truck tag or off-dock (CTC) truck tag to each truck under license that is utilized for container trucking services; We use these same driver and trucks to do our lcl deliveries in lower mainland.

- 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.

Hope you take this feedback into considerations.
Thanks,

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