

Ocean

TRAILER (Division of C.Keay Investments Ltd.)

RENTALS, LEASING, SALES, SERVICE & PARTS

9076 River Road  
Delta, B.C. V4G 1B5  
Phone: 604-940-0210  
Fax: 604-940-0610  
Toll Free: 1-800-891-8858  
www.oceantrailer.com

February 28, 2020  
Michael Crawford  
Container Trucking Commissioner  
Office of the BC Container Trucking Commissioner  
Via email: [Michael.Crawford@bcctc.ca](mailto:Michael.Crawford@bcctc.ca)

Re: CTS Licence Reform: 2020 Licence Application and Process & Tag Management Policy

Ocean Trailer/C. Keay Investments would like to provide feedback regarding the proposed changes to the license system. We feel an increase in the mandatory number of tags from 5 to 10 will be damaging to the small operator.

Ocean Trailer/C. Keay Investments has been in business for 39 years supporting the transportation industry in Canada. We feel that taking away a company's ability to operate because of its size is prejudicial and is not the Canadian way. We feel if a company meets the standards and criteria for licencing, safety, and tag requirements - the size of the company should be immaterial.

A quote from our Prime Minister:

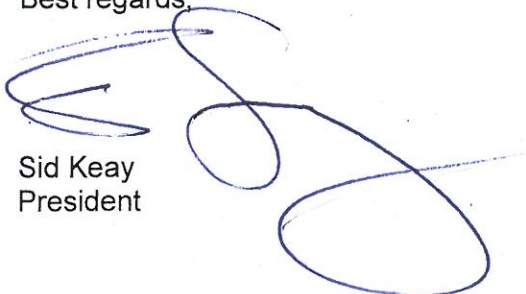
*"Small business owners move Canada forward. They invest in our communities, transform new ideas into market-ready products and services, and unlock economic opportunities that create jobs and grow the middle class."*

*"Small businesses are the backbone of our economy. They make up 98 per cent of all business operations in Canada, employ over 70 per cent of the total labour force in the private sector, and contribute more than 30 per cent to our gross domestic product."*

Ocean Trailer agrees that the industry needs changes, but feels all companies should be treated fairly and equally. We feel the size of the company should not be a defining factor in your criteria and decision-making process.

Thank you for this opportunity to provide our feedback regarding the CTS License reform.

Best regards,



Sid Keay  
President