

UNIQUE TRUCKING LTD.



16268 River Rd, Richmond, B.C. Canada V6V 1L6

Ph: 604 277 5050 Fax: 604 277 5052 E-mail: uniquetrucking@shaw.ca

Off-Dock Drayage Insights Report Feedback

Dear OBCTCC,

Regarding the questions asked about the off dock drayage, we have some feedback from our perspective. We do think that off dock work including CP Rail, CN Rail, any other empty drop off or empty pick up return facilities should be regulated. In addition to this, we think that regulation should also go so far as setting the rates for off dock work slightly higher than regular off dock port rates. Our suggestion would be to match the ongoing off dock rates in order to allow for companies to better upkeep their business in the current times. Off dock trucks should not be misused to beat standard ongoing rates. Trucks should be utilized to serve customers at a higher standard and meet each customer's special service needs, as they are quite variable.

There should not be a two tier system. There should be one pay scale if one would like to get into container business using the same truck, to ensure fairness. For example, the estimated rates for the non-TLS I/O Trip rate for an off dock rate should be regulated and increased in price. There is almost a \$40 variation in the TLS licensed I/O rate and non-TLS licensed I/O rate, which is a large difference, and would push people to opt for the cheaper alternative. This price difference creates the possibility of using this cheaper option (non-licensed I/O) for off dock work to save money. This should be regulated to a standardized price to narrow down the difference. Similarly, the pay scale for the non-licensed company drivers (hourly) should be the same as the TLS licensed hourly rates.

Lastly we also think that the maximum off dock trucks should make up about 20-25% of the total fleet of company. These off dock trucks should be audited and monitored in a similar manner to how on dock trucks, to maintain the same quality and control over them. Registration of off dock trucks should be a speedy and efficient process, and have yearly fees of approximately \$1000 to cover port audits and administrative expenses. Based on our experiences in the industry in the last two decades or so, we hope you take our feedback into consideration.

Regards,

A handwritten signature in black ink, appearing to read 'S. Singh', is written over a light blue horizontal line.

Surjit Singh Sidhu

Director