

TrasBC Freight Ltd.

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27 May 2022

Office of the British Columbia Trucking
Commissioner
1085 Cambie Street
Vancouver, BC V6B 5L7

Attention: Michael Crawford
BC Container Trucking
Commissioner

In response to the license amendments consultation guide, TrasBC Freight would like to comment on a few subjects. Please see the comments below.

Electronic record keeping requirements:

TrasBC has been using two independent digital software's to track the activity of drivers and tagged trucks for over the last few years. This consists of using GPS data from *Fleet Complete* to ensure the movements of a truck correlates with the driver's own activity that is logged into their digital system by themselves. This activity by the drivers is logged into a separate digital software/app, called *Drive Smart*. However, some TrasBC drivers are reluctant on using this digital software because of their own lack of experience and knowledge with technology. Note, these drivers are among the most experienced drivers in the trucking industry, however, the new digital changes may affect their employment if they choose to become non-compliant with our companies practices which ultimately is a violation of the OBCCTC's regulations. Thus, we ask the Commissioner to consider providing a reasonable exception for such drivers that are not comfortable to use the digital apps/software's because of their lack of knowledge. In essence requiring them to input data digitally would be unnecessary where those same drivers can use written copies to submit their daily activity, which can then be checked with our separate independent GPS data which is already functioning on their trucks.

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Off-dock amendments-unlicensed Companies:

TrasBC respects the need to ensure subcontracting is restricted to only companies that are licensed under the OBCCTC. However, there may be some sort of an exception that could be provided for work being conducted outside the lower mainland where the CTS rates are not mandatory. I.e. if a company has decided to subcontract work to another company that is not licensed, but the goods being transported are from outside Chilliwack BC, and the destination for those goods are also outside Chilliwack BC, perhaps an exception should be provided for such subcontractors.

We hope these comments are considered, and that there may be an opportunity to further discuss these issues in a later step. TrasBC Freight thanks the OBCCTC for the opportunity to advance such comments on multiple subjects.

Sincerely,

Inderjit Aulakh