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**Subject:** Affects on inflation  
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**Good afternoon** Commissioner,

Respected Trucking Commissioner,

**I am writing this letter to bring your attention on the topic of inflation of the rate ( hourly pay ) and overtime laws. Considerably , OBCCTCs' jurisdictions on federally regulated companies, BC regulation also indicate the hourly rate to be \$22, and federal to be \$ 24 ( 70 hrs per week )**

It is my understanding that trip rates for owner operators do not currently include overtime pay and the base trip rate for owner operators has not been increased for some time. This means that if a trip takes longer than expected, the owner operator may not be compensated fairly for their time. This is particularly concerning given the overtime law that requires time and a half to be paid after 9 hours or 45 hours for hourly drivers/owner ops. If trip rates do not include overtime pay, this could result in decreased competitiveness for the industry, both the employee and the employer. If other industries with controlled hours are paying overtime after 40hrs a week will this industry be able to pay them after 45hrs due to uncontrolled hours at the ports? If we are going with the BC regulations, BC regulation also indicate the hourly rate to be \$22, and federal to be \$ 24 ( 70 hrs per week ) our industry hourly rates are getting closer to \$30 and owner operator rates are getting closer to \$70. In addition, during the previous hourly rate increase it was advised that when the rates will be increased next, the owner operator trip rates will also increase. Furthermore, if owner operators paid by the trip do not have any overtime pay, it could lead to unfair rate increases that may be noncompetitive. I believe that if the overtime for owner operators paid by the trip was calculated into the base rate or added in some other way, the market could still stay competitive. Licensed trucking companies have been asking the past commissioner, for hourly wait time rate increases in the port. As they currently do not match what we are paying by the hour to our owner operators, at one point the port waiting time rate was less than half of what we were paying to drivers. The document sent to the industry show the reason to increase the hourly rate is due to inflation. I believe that increasing the hourly rate to combat inflation is not a sustainable solution, as it could lead to further inflation and ultimately harm all Canadians. Finally, I would like to address the study conducted by Cascadia. While it has been said that Cascadia contacted the drayage industry, none of the companies I know or individuals working in the industry have been contacted by them. As such, I question the validity of their findings and urge the Commissioner to thoroughly review all available data. I would like to urge the Commissioner to take these concerns into consideration when making decisions about overtime laws and rates in the container trucking industry. It is important that we find a way to keep the industry competitive by making sure paid by trip owner operators also get overtime built into there rate and no one receives an advantage over another carrier.

Thank you

Your's Sincerely

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