

**From:** [Gail Sangha](#)  
**To:** [Registrar, CTC CTC:EX](#)  
**Cc:** [Info, CTC CTC:EX](#); [Gurmez Sangha](#)  
**Subject:** Concerns in relation to the hourly rate and overtime in the trucking industry  
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**TSD Holding Inc**  
**7453 124 St Surrey BC V3W 3X2**  
**Phone: 604 507 7777**

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

Dear Commissioner,

We write with reference to the concerns due to the increase of the hourly rate and overtime in the trucking industry relating to OBCCTC's jurisdiction on federally regulated companies in BC.

As there has been absolutely no increase in the income of companies, the increase in the hourly rate and overtime, second time during the course of just one year, has been extremely challenging. Due to fluctuating increase in the price of gas/fuel, the maintenance cost of the vehicles (and other related expenses) has been extremely costly, and it has become extremely difficult to keep the business afloat.

When all businesses have been affected throughout the world due to covid and recession, the implementation of the new rule has directly, as well as indirectly, drastically affected the container & trucking industry.

Further, in other industries, overtime after 40 hours per week is possible due to the nature of the work and the controlled work hours. However, in the trucking industry, due to unexpected and varied wait times at the port, there is absolutely no control from our end. With varying wait times, please note that

there is no increase in price charged for (the wait times) drivers at the port either. According to BC regulations the hourly rate is \$22 and currently the rate is closer to \$ 30 while the owner operator rate is almost \$70.

The owner operator rates have not been revised for some time, i.e., if a trip takes longer than expected, the owner operator is not duly compensated for their time as only the base pay is paid. Given that the overtime laws require time and a half to be paid after 9 hours or 45 hours for drivers. In addition to the above, note that our customers based in SK, Regina will not increase their rates mid year.

In addition to the above, note when the hourly rate revision was completed on previous occasion, it was also decided that the owner operator rates too would be increased. If the owner operators who are paid per trip are not accordingly, the rate increase would obviously be uncompetitive. To prevent this drawback, the best practice would be for the additional amount to be reflected in the base pay or by other means of payment of the owner operator.

To avoid bringing business to a standstill, the implementation of the new rule, i.e. increase in hourly rate with respect to overtime, we humbly request that it be revoked.

We look forward to receiving a favourable response.

Gurmez Sangha  
Owner/President