



Dear Mr. MacInnes,

Please accept this letter as a submission for the 2023 rate review submission.

As we have read from the letter, we believe that it would be much easier for the industry to calculate how to pay I/O with overtime if the rates were hourly. In addition, by making I/O's hourly it will help owner operators that have been sitting for months to receive container work as companies operating with sonorities will be required to use other operators in their company and divide the container work.

To calculate the overtime if it is by hourly is very easy, once the 9hrs are up any additional time will be overtime. Similar can be done for trip rates as well, once the 9hrs are up for the operator any additional time after that should be overtime. We believe the overtime rate should be the same as the driver's overtime rate, as only the cost of the operator itself has gone up. This will also help owner operators who employ drivers to be able to cover their costs.

Thanks

Paramvir Singh