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Mr. Glen MacInnes
Office of the British Columbia Container Trucking Commissioner
1085 Cambie Street
Vancouver, BC V6B 5L7

VIA EMAIL: registrar@obcctc.ca

February 26, 2024

RE: OBCCTC 2024 CTS Licence Reform Proposed Changes - January 2024

Dear Mr. MacInnes,

As a director of Port Transportation Association, I would like to note that I am in full agreement the points made in the submission provided to the Office on the British Columbia Container Trucking Commissioner (OBCCTC) on behalf of the membership.

The comments below are specific to how the 2024 CTS Licence Reform Proposed Changes will directly affect H. Rattan Trucking Ltd.

H. Rattan Trucking Ltd. has been in operation since 1992, and has long-term customer relationships as a sole provider drayage and trucking services. As one of the smaller TLS Carriers, with two truck tags, H. Rattan Trucking Ltd, requests that given our longevity in the industry and our continued compliance and payments of all costs associated with the CTS Licence and TLS Access Agreements, we be grandfathered despite not reaching the at the five tag minimum.

Much of the work provided to our 5-ton units comes directly from the goods picked up at terminals for our main customers. By losing the ability to complete the drayage portion of the work, H. Rattan Trucking risks significant loss across all sectors of our business, which is the key source of income for not only my family, but each of my employees' families.

According to the BDC, 99.8% of businesses fall within the small to medium sized category, with more than 73.9% employing less than ten people and 55.3% being considered of that being

considered a “micro-enterprise” with four or less employees¹. It is smaller companies like H. Rattan Trucking Ltd. that continue to pivot with economic changes, and regulations to remain competitive and compliant, with both ease and urgency in order to remain strong within our sector. H. Rattan Trucking Ltd. believes that the OBCCTC has overlooked the smaller carriers as being insignificant and unnecessary, when in fact, though small, the smaller carrier is a key player in both BC and Canada’s overall economy.

As for specific licence changes, H Rattan Trucking Ltd. would like to oppose CTS Licence amendment 6.16 - “*The Licensee can only preform Container Trucking Services at a facility in the Lower Mainland approved by the Commissioner*”, as this is ill defined and it is our belief that by limiting access to select facilities is beyond the jurisdiction of the OBCCTC.

H. Rattan Trucking Ltd. also objects to Appendix A item 1-j, in which it notes “*The Licensee must not operate in any way directly or indirectly, with a non-licensee who performs unregulated off-dock container trucking services between facilities and locations within the Lower Mainland.*”

H. Rattan Trucking Ltd. relies on secured yard space rented and supplied by third parties, including one non-TLS company for Hazmat specific container storage, and quite often makes use of the ability to street-turn containers to other CTS licensed carriers in order to manage workflow. Any changes to the ability to continue with either would significantly alter how we can conduct business.

H. Rattan Trucking Ltd. thanks you for your consideration, and look forward to continued consultation during the 2024 CTS License.

Sincerely,

Harinder Rattan
President
H. Rattan Trucking Ltd.

¹ <https://www.bdc.ca/en/articles-tools/business-strategy-planning/manage-business/10-things-didnt-know-canadian-sme>