

Port Transportation Association



To the Attention of Michael Crawford
Office of the British Columbia Container Trucking Commissioner
1085 Cambie St. Vancouver, BC V6B 5L7

July 20, 2020

RE: Heath and Safety

Mr. Crawford,

The Port Transportation Association (PTA) is writing you today to request an immediate halt to the 2020 CTS Application.

The PTA feels that this is the necessary course of action for two reasons, the first being the blindsiding of our Industry with the CTS application invasive questionnaire. As we have attempted to communicate with you through multiple letters, including one from our legal counsel, the request of private and confidential Customer Information was never discussed at any point during steering committee meetings. We believe this was strategic on the part of the OBCCTC, in effort to limit the ability for companies to oppose what is little more than a data mining opportunity. Data, which we feel we have no right to disclose to a third party, as it does not belong to us, but the Companies we do business with.

While the Commissioner's office has promised that the OBCCTC will treat customer lists as supplied in confidence and will not be disclosed unless required by law. Unfortunately, this promise does little to stem the concern of our members, or our customers' privacy concerns. This highly sensitive data, no matter how protected by the OBCCTC, all it would take is one cyber attack or paperwork left unattended for this information to be left vulnerable to misuse and create significant financial hardships.

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For transparency and industry purposes, the PTA intends to distribute all content and post all meaningful dialogue on our website, to be viewed by both industry and the public.

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Our second, and a growing concern, we are hearing amongst our company drivers and independent operators, is the rising COVID-19 numbers, and the continuous reporting that we will be facing a Second Wave come Fall. The PTA must echo this concern, and question why the CTS application process was even initiated at this point in time.

With the OBCCTC's decision to reduce the overall number of tags, the OBCCTC has effectively created a situation where there will be hundreds of company drivers and Independent Operators may see their jobs be eliminated and must move companies to find work. In a time where face to face contact should be minimized, there is going to be mass face-to-face interviews and road tests, which even masked, still come with increased risk of contracting or spreading COVID-19.

Not only is the spread of disease a concern for us as Company owners, we are also concerned about the mental wellbeing this decision to move forward and reducing tags has created amongst our employees. This is an unprecedented time; our employees are already facing stresses of staying healthy and ensuring financial stability of their households during the pandemic. Displacing a large number of employees at this point in time will have a very negative effect on our communities, especially within Surrey where we have a large portion of our employees are located.

Now is a time for stability, it is with this in mind, that the PTA would like to propose the following. We are asking the OBCCTC to halt the CTS Application, and renew all current licences at the initial tag count they were given upon signing their contracts in 2018. We then propose that the OBCCTC review each company's tag utilization individually over a period of time using Port data that you are privy to, and make any necessary tag adjustments at that time, to spread out any driver displacement.

We would also like to see a company driver and I/O satisfaction survey as part of this individual review process. We believe that if the OBCCTC were to survey, they would see that it is those

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working for the small and medium sized companies are actually satisfied with the hours they are provided, as opposed to those at larger companies, where there may not always be work available to ensure they receive the hours they would prefer. These driver surveys would assist in ensuring tag efficiency.

We have polled a handful of drivers and asked them if they were concerned about the license renewal, they answer was an overwhelming, YES.

The drivers that are happy with their current place of employment feel an unbelievable amount of anxiety because they know that if the company they are working for loses tag allocations, they will have to run out and attempt to seek employment in these unprecedented times.

It is because of this, we **STRONGLY** feel that the Commissioners obligation to ensure tag utilization and the removal of tags should **ONLY** be exercised during the course of the license term, not upon renewal. Companies should have the option to renew (without concern) with the same amount of tags that they currently hold going into a renewal.

We have to remember, that although we use the term of “tags” loosely, there is a driver behind each and every one of those “tags” that depends on that work to provide for his or her family. We cannot continue to treat these as a commodity, that is why we have requested that the OBCCTC directly poll drivers from companies, and to be clear, not only the top drivers, rather the lower percentile in terms of seniority. This can easily be assessed by the request of select driver pay stubs.

The PTA stresses that it is crucial to our industry, our employees, and our communities, that the CTS Application process be stopped at this time to give you the opportunity to gauge tag allotment and adjust accordingly before renewals take place. Although the application process is currently underway, we believe it is the OBCCTC’s duty to act within the current situation, and

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put the health, and safety of all involved at the forefront of any further actions. We kindly ask for our proposed alternative to be considered and implemented as quickly as possible.

Sincerely,

The Port Transportation Association

CC:

Hon. Garneau & the Ministry of Transportation

MLA Clair Trevena

MLA Harry Bains

MLA Garry Begg

MLA Mr. Jagrup Brar

MLA Rachna Singh

MLA Ravi Kahlon

MLA Tracy Redies

MLA Jinny Sims

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