

Port Transportation Association



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

June 16, 2021

RE: Current Off-Dock Capacity & Tag Management

Mr. Crawford,

Please accept this letter as a request for information regarding the current off-dock capacity and the effect it is currently having on tag management.

With the closure of Delco, the industry is seeing significant delays on a regular basis throughout the remaining off-dock locations. Most recent delays are upwards of two to three hours to return or pick up a container creating a situation where the truck or trucks caught in these delays are then unable to meet the terminal reservations they have been scheduled to complete, resulting in FAS charges or cancelled reservations with failures of container delivery or pick up.

The OBCCTC has continuously denied carriers requests for additional company tags that would help to reduce the strain of off-dock and terminal delays. As such, the Port Transportation Association must ask whether the Commissioner has studied the impact to the tag system created by the decrease in off-dock capacity, and what his intentions are to increase capacity to mitigate backlogs.

The PTA maintains the position that the term “tag” should be defined or referred to as a permit to operate a transport truck for the purpose of picking up and dropping of containers in British Columbia.

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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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The PTA TLS license holders request that the OBCCTC release truck tags to companies that are requesting them and at the same time refrain from using the position of the BC Trucking Commissioner to manipulate tag release based upon status, owner operator or company truck tag.

Licensees strongly feel that if tags are issued to a company, the licensee should have the opportunity to choose the type of tag that would best fit their company model, providing that they are paying the mandatory minimum rate set out by the OBCCTC.

We encourage the OBCCTC to familiarize themselves with the different operation models that currently make up the TLS system and understand that by effectively preventing companies from choosing the tag that would best suit their needs, directly infringes upon a company's freedom to operate a small business in British Columbia as they deem fit.

Some of our members have staff employed currently serving in other capacities and have expressed their intention of moving up within the company to service the Ports as a company driver.

We feel that these employees have the fundamental right to company driver positions and should not be indirectly forced by the OBCCTC to take on the burden of a large debt to purchase a compliant truck. As of now the OCCTC had demonstrated a lack of understanding differing company models and has only made I/O tags available for companies that seek additional tags.

Pertaining to the tag classification I/O versus company, we are specifically requesting on what legal basis is the OBCCTC relying on that would enable the office to only offer out stagnant I/O tags rather than offering the opportunity to companies to convert stagnant I/O tags on the Commissioners board, to company truck tags.

We look forward to hearing your findings on both issues at hand as they are closely related.

Sincerely,
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