

Your way ahead



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April 4, 2018

Honourable David Eby
Attorney General

Via email: AG.Minister@gov.bc.ca

Re.: ICBC Rate Fairness Engagement and Survey

Dear Attorney General Eby:

On behalf of the BC Trucking Association (BCTA) I would like to offer comments from the road transportation industry regarding ICBC's proposed insurance changes outlined in the "rate fairness survey." These comments complement BCTA's nine recommendations submitted in our letter dated February 9, 2018. BCTA requests your support on two of these measures in particular: a minimum entry-level training standard for Class 1 drivers and a driver improvement course to address the increased exposure of commercial drivers.

Based on our discussions with senior ICBC staff, we understand that the consultation on rate fairness applies only to individual policy-holders, and does not capture fleet policy-holders. BCTA understands the direction taken by government, as individual policy-holders capture the majority of ICBC's policy holders. However, we urge the government to work with BCTA with the goal of implementing changes that promote safety and affordability for the commercial road transportation industry.

Furthermore, even though the majority of motor carriers have fleet insurance policies, many truck drivers are owner-operators with individual policies. While we support the concept of a risk-based pricing model, by the very nature of our business, (i.e., increased driving time on the road) the proposed changes by ICBC (i.e., where accidents and demerit points follow the driver) have the potential to make commercial drivers unemployable. For instance, if at-fault accidents and associated demerit points and premium increases follow drivers, owner-operators will likely face significantly higher insurance costs. Not only does this directly affect their employability and their ability to earn a living, it does not recognize the fact that their risk of being involved in an accident is much higher than most other individual vehicle owners, simply due to the amount of driving their occupation requires.

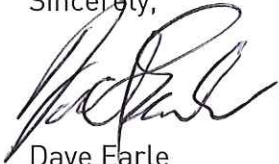
As BCTA indicated in our previous letter, the road transportation industry is currently experiencing a driver shortage, and there is no minimum entry-level training standard for commercial vehicle operators. This means drivers often enter the industry with insufficient skills and knowledge, even if they have taken courses through a driver training school, and it can be difficult for motor carriers to

assess the competency of the drivers they hire. The range in driver training standards and resulting skill levels further increases a driver's risk of being involved in an accident.

If ICBC implements changes to how at-fault accidents affect individual policy holder premiums, there must be an avenue for commercial drivers to address their increased risk, improve their driving skills, and preserve their ability to earn a living. As outlined in our February 9 letter, we strongly recommend that ICBC establish a point-reduction program for drivers with commercial licences, similar to Alberta's Professional Driver Improvement Course (PDIC). This type of course would promote safe driving by rewarding commercial drivers who complete the course with a three-demerit-point reduction along with the ability to avoid significant insurance rate increases, either for their own insurance policy or for their fleet policy. We also recommend the establishment of a minimum standard for entry-level training for Class 1 drivers in BC, similar to Ontario's Mandatory Entry-Level Training requirement as of July 2017. Going forward, a common standard for minimum entry-level training would improve the skills and abilities of new truck drivers who obtain a Class 1 licence.

Further to our February 9, 2018 letter, we look forward to your response, and to the opportunity to engage with your staff on all nine of BCTA's recommendations. We believe our recommendations will improve ICBC's products for commercial vehicles, in addition to improving affordability and road safety for all road users BC.

Sincerely,



Dave Earle
President & CEO

cc.: Honourable Claire Trevena, Minister of Transportation and Infrastructure
Douglas Scott, Associate Deputy Minister, Attorney General
Sam MacLeod, Superintendent of Motor Vehicles, RoadSafetyBC
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