



Private Motor Truck Council of Canada
Association Canadienne du Camionnage d'Entreprise



November 15, 2024

To:

Mr. John Pearson,
Executive Director, Council of Deputy Ministers

Cc:

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Subject: Western Provinces Long Combination Vehicles (LCV) Memorandum of Understanding (MOU)

The Private Motor Truck Council of Canada (PMTc) is Canada's sole national association dedicated to representing the interests of private and dedicated fleet operators across the country. PMTC members collectively operate over 20,000 trucks, employ more than 20,000 drivers, and logged over 1.4 billion kilometers in 2023. Recently, at the direction of its Board, PMTC established a Long Combination Vehicle (LCV) Subcommittee. This group unites PMTC's private fleet members who operate LCVs nationwide, providing a platform for sharing best practices, discussing origin/destination data, addressing concerns, and raising awareness to enhance operational efficiency. The committee aims to advocate collectively to government bodies on issues impacting fleet operations.



The PMTC attended the Task Force on Vehicle Weights and Dimensions Policy Western Region meeting on June 05, 2024, to discuss the harmonization of LCV special permit conditions in Western Canada (AB, BC, MB, SK), and potential revisions to the Western LCV Memorandum of Understanding (MOU) that would enhance road safety and operational efficiency.

We appreciate the efforts from Transport Canada and the Western Provinces to streamline Long Combination Vehicle (LCV) travel across the four jurisdictions. In today's world, where sustainability and environmental impact are top of mind, LCV operations offer a key solution for reducing greenhouse gas emissions, removing one truck from the road for each LCV in operation. This reduction not only supports cleaner air but also alleviates traffic congestion and addresses driver shortages. With these benefits in mind, making LCV travel as seamless as possible is essential—while maintaining the highest standards of road safety. Below, the committee has outlined areas where further improvements are needed.

FEEDBACK FROM THE PMTC SUBCOMMITTEE - WESTERN CANADA LCV MOU

1. Driver Qualifications and Training

Section 1(d) states *"Has passed the Canadian Trucking Alliance's "Longer Combination Vehicles Driver Training Course"*.

The Canadian Trucking Alliance (CTA) training course is no longer applicable in Alberta, Saskatchewan and Manitoba as it has been replaced by Province specific training in Western Canada. We suggest updating section 1(d) accordingly.

Additionally, we suggest a consistent training standard regarding the knowledge verification process and the issuance of the driver training certificate. Currently, the examination process varies significantly in each province including length of examination, number of questions, open or closed book. A common testing standard would support proof of driver knowledge equivalency / parity between jurisdictions.

Section 1(e) states *"The driver's abstract, dated not more than one month prior to the issue date of the Drivers Certificate, must show no driving-related criminal code convictions in the prior 36 months; no more than 2 moving violations in the prior 12 months; and no more than 3 moving violations in the prior 36 months. The date of conviction and the current date will be the dates used to determine time periods."*

We suggest adding a point value to these conditions, as not all moving violations are the same. As an example, 2 speeding tickets for 16 km's over the speed limit will have a much lower point value than 2 moving violations for 31 km's over the speed limit. In our view, these should not be treated the same.



5. Adverse Weather Conditions

Section 5 States *"The company is required to make a reasonable effort to determine the driving conditions on the route."*

"Jurisdictions may require that LCV's are not dispatched when adverse conditions are known to be present on the route, and may also require drivers encountering unexpected adverse conditions to stop at the next safe location (or as directed by an authorized official or a peace officer) and wait for the adverse conditions to abate."

We suggest that the MOU includes definitions of "Adverse Weather Conditions" and "Reasonable Effort" that is tied to the Provincial Road conditions report (for instance, Travel not-recommended notice) and also address the Out-bound versus In-bound portion of the trip. With very few legal safe places for LCVs to pull over, the carrier should be judged on "reasonable effort" to safely redirect the LCV vehicle to a parking location.

9. Vehicle Weights and Dimensions – General Provision

The committee requests that a lead trailer pulling a dolly be exempted from being considered an LCV in certain situations for operating zones only for the purposes of transferring, as long as it meets all other requirements under the LCV MOU. Under the current conditions, this is considered an LCV in some jurisdictions, which impacts the fleet operations to relocate the dolly efficiently.

FEEDBACK FROM THE PMTC SUBCOMMITTEE: ***NOT INCLUDED IN THE WESTERN CANADA LCV MOU**

1. Carrier Eligibility

With driver misclassification emerging as a growing concern nationwide, we recommend including a mechanism in the MOU for provinces to verify that payroll deductions and tax obligations are being accurately fulfilled. If the four jurisdictions can collaborate on a unified verification process, it would help reduce redundant reporting requirements for carriers, streamlining compliance across regions.

2. Safety Rating Certificate

The rating for Safety Fitness Certificate required to apply for the LCV Exemption Permit varies among the Western Provinces. Certain jurisdictions accept a Satisfactory – Unaudited rating while others require Satisfactory – Audited ratings. The ease of obtaining an audit varies by jurisdictions depending on if Third Party auditors are or are not allowed. This is creating a barrier to entry for fleets that use LCV in non-domiciled jurisdictions.

We suggest that the jurisdictions collaborate to resolve this issue.



3. Statutory Holiday Hours of Operations

Some jurisdictions have holiday operating hours restrictions. As the safety of LCV's have been proven, we suggest that all holiday operating restrictions be permanently removed in all jurisdictions.

4. LCV Parking

LCV public parking is an issue in all regions. We encourage jurisdictions to include designated LCV locations in public commercial parking areas and to have enforcement tools so that LCV designated spaces are not utilized by other road users. The PMTC committee clearly stated that dedicated LCV spots are a necessity.

5. Drop Off Area

We suggest that LCV usage would increase if each jurisdiction could set up switch yards in key areas where the LCV Primary Networks end. This would allow carriers to pull off, separate units, make deliveries with the single units, then re-hook and head back after completing delivery. Having access to switch yards would also reduce GHGs and help reduce traffic congestion.

On behalf of the PMTC and its members, thank you for your consideration. We look forward to continuing an open dialogue.

Regards,

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