



November 15, 2024

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

Cc: Joe Lynch, Sr. Vehicle Standards Engineer, Ontario MOT

Francois Janelle, Technical Standardization Directorate, Ministry of Transport and Sustainable Mobility of Quebec

Rob Taylor, New Brunswick DOT & Infrastructure

Brent Connolly, Vehicle Standards Engineer, Nova Scotia Dept. of Public Works

Subject: Eastern Provinces LCV MOU Updates

The Private Motor Truck Council of Canada (PMTC) is Canada's only National Association that was founded to represent the views and interest of Canada's Private and Dedicated Fleet operators. PMTC's members collectively operate over 20,000 trucks, employ over 20,000 drivers, and operated over 1.4 billion km's in 2023. Recently, at the request of the PMTC Board, the PMTC formed an LCV subcommittee, to bring together PMTC Private Fleet Members who operate LCVs across the country. The purpose of the committee is to share best practices, Origin/Destination locations, as well as share pain points and raise areas for improved efficiencies, and then bring these issues to governments, as one collective voice.

We appreciate the work the provinces have done to date to make LCV Travel more seamless and allow for travel between the 4 jurisdictions. In today's world, we are all worried about sustainability and our impact on the air we breath and the climate we live in. LCV operation is one of the best ways to remove GHG's from our operations, by removing one truck from the road for every LCV in use. This also helps to reduce gridlock and labour shortages. With this in mind, it is imperative that we make LCV travel as seamless as possible, while at the same time ensuring road safety is not jeopardized. Areas for improvement, as identified by the committee, are identified below.

1. Carrier Eligibility

As driver misclassification continues to become an increasing area of concern right across the country, consider adding to the MOU a method for the provinces to verify proper payroll deductions and tax obligations are met. If the 4 jurisdictions can work on having a similar verification process, this would help to alleviate duplication of reporting for carriers.

2. Driver Qualifications and Training

On the 4th bullet point it lists no driving related Criminal Code convictions in the prior 36 months, no more than 2 moving violations in the previous 12 months and no more than 3 in the previous 36 months. We suggest you consider also adding a point value to this, 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 31 km's over the speed limit. In our view, these should not be treated the same.

3. Operational Restrictions

We feel the maximum operational speed of 90km/hr should be reconsidered. With several highways in the provinces now having speed limits of 110 km's, 90 km's is becoming a safety issue with the vast speed differential. If a speed limit increase overall is not something that the provinces will entertain, at the very least, we feel the limit should be raised on the sections of highways with a 110 km/hr limit. The 100km speed limit already exists in the Western Provinces MOU.



4. Signage on rear of LCV Configurations.

While signage requirements (colours) are very close to being the same, they are not identical. With the differences being so small, we suggest the 4 jurisdictions get together and update the sign requirements to be 100% the same.

Also, New Brunswick has recently added a 'Wide Right Turn' sign requirement. To our knowledge, this is the only jurisdiction that requires this.

5. Equipment Requirements

Speed recording devices and record retention. The MOU indicates retaining info for 90 days, while Ontario's LCV document indicates a 60-day retention. It would make sense for the 4 jurisdictions to align the requirement for consistency.

Tractor Horsepower is listed as 460 in the MOU, while other individual jurisdictions require only 425hp. Again, it would make sense to align the 4 jurisdictions with the same requirements.

6. Overall Length Limit Determination

The PMTC LCV committee has made a request that the length either be increased to 41M, or that a moose bumper not be considered in the determination of length. In many cases members are required to remove Moose bumpers to fit with in the 40M requirement. The Western MOU already has a 41M limit in their MOU.

10. 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. This would be helpful for moving a dolly between Quebec and New Brunswick, as one example. Under the current conditions, this is considered an LCV, and they are not able to transfer the dolly on the remaining 2 lane section between the 2 jurisdictions. Consideration was given in 10.1 for weight, other considerations as mentioned above would be appreciated.

11. Dimensions and Gross Limits

Although the dimensions and weights are close, there are still some differences in length and axle spreads between the MOU and what exists in some individual jurisdictions. Considering, in most cases, the differences are so small, it would be helpful to industry if the jurisdictions could get together and close the gaps and make the configurations the same. It would also be appreciated if the GVWR of 62,500kg's could be increased to 63,500kg's.

General Requests not in the MOU/ For consideration by individual Jurisdictions

Some jurisdictions have holiday operating hours restrictions. As the safety of LCV's have been proven, and these restrictions have been exempted since COVID, it would be appreciated if all holiday operating restrictions could be permanently removed in all jurisdictions.



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LCV parking is an issue in all regions. For areas that have designated LCV parking, enforcement tools are needed to ensure that spaces designated for LCV's is not utilized by other road users. For the jurisdictions that have not designated LCV parking in their rest areas or service centres, the committee feels dedicated LCV spots are a necessity.

Members have also identified a few sections of Highway in Ontario and Quebec, that while not controlled access highways, are divided and 4 lanes. The committee requests that all jurisdictions consider adding these types of routes to their primary network. While we understand there is some concern about safety on uncontrolled access highways, LCV operations have proven to be some of the safest operators on the highway, with superior safety records to other operators. The type of routes we are discussing are open to B-train tankers, and one could argue that the LCV operators would not jeopardize safety on these routes. Opening up of these types of routes would allow for the expansion of routes, remove GHG's and reduce congestion in these areas.

Members have also suggested that it would help to increase LCV usage if drop/switch yards could be constructed by jurisdictions in key area's where the LCV Primary networks come to an end. This would allow carriers to pull off, separate units, make deliveries with the single units, then re hook and head back after completed. This is seen in jurisdictions such as New York State where they have yards off the Thru way to allow triple trailers to be unhooked at key population centers to allow deliveries to be made off the main highway. If we considered doing something similar here, it would have a real opportunity of increasing LCV usage, removing more GHG's from the transportation industry, and once again helping to reduce congestion.

On behalf of the PMTC and its members, we appreciate your consideration and look forward to an open dialogue going forward.

Yours Respectively

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