

July 29th, 2019

Via email: Claire.trevena.mla@leg.bc.ca

The Honourable Claire Trevena, MLA
Minister of Transportation and Infrastructure
Room 306 Parliament Buildings
Victoria, BC V8V 1X4



RE: Ride-hailing Regulation and Driver Licence Class Requirements

Dear Minister Trevena,

In response to new regulations governing ride-hailing in British Columbia, the Sustainable Transportation Partnership of the Central Okanagan (STPCO) would like to reiterate its position regarding driver licence class requirements. While the STPCO is pleased with the overall flexibility of the regulatory approach, we would like to see a review of the decision to enforce a minimum requirement of a commercial class 4 licence, as opposed to a general class 5 licence.

The STPCO is a formal partnership of the City of Kelowna, City of West Kelowna, District of Lake Country, District of Peachland, Westbank First Nation and the Regional District of Central Okanagan.

The STPCO is interested in ride-hailing regulation flexible enough to meet variable demand in the passenger transportation market while delivering a safe transportation option to the region's residents and visitors. The STPCO supports the introduction of Transportation Network Services (TNS) that facilitate ride-hailing, as it aligns with regional goals to reduce car dependency, increase mobility options, reduce the need for parking, lower impaired driving rates, and prepare the region for technology change in transportation.

We support the flexible approach on the issue of boundaries, rates, and ensuring supply of service will meet consumer demand as outlined in your letter to British Columbia's Passenger Transportation Board on July 13, 2019. This flexible approach is key to unlocking the value ride-hailing will offer to the Central Okanagan as well as British Columbia at large.

We were disappointed to learn that the regulation insisted on a class 4 licence as the minimum licence class for all TNS drivers. Limiting drivers to only those who hold a minimum of a class 4 licence could greatly limit the viability of ride-hailing as a

transportation option in our region and in other areas across the province. We urge you to reconsider establishing the class 4 commercial licence as the minimum licence class for all Taxi and TNS drivers.

Both the provincial government and the Legislative Assembly of British Columbia over a span of multiple years have taken steps to consult with key stakeholders and set the direction for ride-hailing legislation. Three separate government consultation processes were employed, one conducted by Hara Associates^[i] on behalf of your Ministry and two by the Select Standing Committee on Crown Corporations^{[ii][iii]} with direction from the Legislative Assembly. Each of these processes delivered the same recommendation with regards to licensing for TNS drivers. They all chose to require Class 5 licences with options to layer additional non-licence requirements for drivers if deemed necessary. None of these consultation processes recommended a class 4 licence as a minimum requirement for passenger directed vehicles.

The STPCO Board believes the appropriate minimum licence is general Class 5 for both TNS and Taxis. Selecting this licence class will ensure that drivers are available on an as-needed basis. This benefit is especially salient when considering the few differences that separate Class 4 and Class 5 licence holders. Other than some additional training and medical screening, the most significant barriers to holding this licence are the requirement of having to have been a driver in BC for two years and the increased time and cost associated with carrying the licence. As discussed within the Hara Report, conducted on behalf of your Ministry, installing a Class 4 licence as the minimum will unfairly impact young people and new immigrants who would need to wait up to three years more before working for a ride-hailing service. Requiring a Class 4 (commercial) licence will negatively impact the availability of TNS service at peak times or make it untenable to operate these services outside of the most populated areas of the province.

We urge you to establish a Class 5 minimum licence class for all Taxi and TNS drivers in British Columbia.

Thank you for accepting our feedback, and we look forward to future correspondence.

Respectfully,





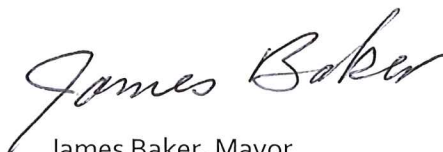
Colin Basran, Mayor
City of Kelowna



Gord Milsom, Mayor
City of West Kelowna



Cindy Fortin, Mayor
District of Peachland



James Baker, Mayor
District of Lake Country



Chief Roxanne Lindley
Westbank First Nation



Gail Given, Chair
Regional District of Central Okanagan



cc: John Horgan, Premier
Steve Thompson, MLA Kelowna-Mission
Norm Letnick, MLA Kelowna-Lake Country
Ben Stewart, MLA Kelowna West
Dan Ashton, MLA Peachland
Stephen Fuhr, MP Kelowna-Lake Country
Dan Albas, MP Central Okanagan — Similkameen — Nicola
Catharine Read, Chair, Passenger Transportation Board

^[i] "Modernizing Taxi Regulation." Edited by Hara Associates Inc., Government of British Columbia Registrar, Passenger Transportation Branch, Government of British Columbia, 19 July 2018, [www.th.gov.bc.ca/rpt/Documents/20180718_Modernizing Taxi Regulation.pdf](http://www.th.gov.bc.ca/rpt/Documents/20180718_Modernizing%20Taxi%20Regulation.pdf).

^[ii] Ma, Bowinn. "Transportation Network Companies in British Columbia." Legislative Assembly of British Columbia, Legislative Assembly of British Columbia, 15 Feb. 2018, www.leg.bc.ca/content/CommitteeDocuments/41st-parliament/2nd-session/CrownCorporations/Report/SSC-CC_41-2_Report-2018-02-15_Web.pdf.

^[iii] Ma, Bowinn. "Transportation Network Services: Boundaries, Supply, Fares, and Driver's Licences." Legislative Assembly of British Columbia, Mar. 2019, www.leg.bc.ca/content/CommitteeDocuments/41st-parliament/4th-session/cc/SSC-CC_41-4_Report-2018-03-26_Web.pdf.