



City of Richmond

Report to Committee

To: Public Works and Transportation Committee **Date:** April 16, 2019
From: Cecilia Achiam
General Manager, Community Safety **File:** 12-8275-02/2019-Vol 01
Re: Information on Kater Cabs Operated by Richmond Taxi

Staff Recommendation

That the staff report titled "Information on Kater Cabs Operated by Richmond Taxi", dated April 16, 2019, from the General Manager Community Safety, be received for information.

Cecilia Achiam
General Manager, Community Safety
(604-276-4122)

Att. 2

REPORT CONCURRENCE	
ROUTED TO:	CONCURRENCE
Transportation	<input checked="" type="checkbox"/>
REVIEWED BY STAFF REPORT / AGENDA REVIEW SUBCOMMITTEE	INITIALS: CJ
APPROVED BY CAO 	

Staff Report

Origin

Business Licence Bylaw No. 7360 specifies which businesses are licenced to operate taxicabs within the jurisdiction of the City of Richmond. Further regulations dealing with how taxicabs are to be operated is regulated by Vehicle for Hire Regulation Bylaw No. 6900.

Findings of Fact

Business Licence Bylaw No. 7360 permits the following companies to operate taxicabs in the City of Richmond:

- Garden City Cabs of Richmond Ltd.;
- Kimber Cabs Ltd; and
- Richmond Cabs Ltd.

Further regulations dealing with taxicabs in Richmond are covered under Vehicle for Hire Regulation Bylaw No. 6900. Contained in these bylaws are requirements that:

- Vehicles obtain approval from the Passenger Transportation Board (referred to in the bylaw as Motor Carrier Commission);
- Vehicles are inspected by a Licence Inspector;
- Vehicles must display permanent signage that displays the name of the company, a telephone number and prominently show the fleet number of the vehicle on the inside and outside of the vehicle;
- Drivers obtain a chauffeur's permit (which includes a check of criminal and driving offences);
- Drivers must not refuse fares;
- Each vehicle is associated to a Vehicle for Hire Business Office and must pay the fee specified for such office.

From time to time, the Passenger Transportation Board ("PTB") approves applications to increase the number of taxicabs licenced to operate in Richmond. Each of the three approved businesses are permitted to increase the number of taxicabs but new businesses wishing to undertake operations would require an amendment to Business Licence Bylaw No. 7360.

Analysis

Richmond Cabs Ltd. ("Richmond Cabs"), doing business as Richmond Taxi, has received approval from the PTB to add 16 additional vehicles (see Attachment 1). Seven of these vehicles will be wheelchair accessible and the other nine will be operated as Kater Cabs. These additional vehicles were approved by the PTB under their "Operational Policy: Modernizing Taxi Regulation, 2018" (full policy provided at Attachment 2). The purpose of this policy is to guide implementations of short term actions to modernize the taxi industry, namely:

- allow existing licensees a one-time opportunity to increase their number of taxi vehicles (plates) by up to 15% in the near future;
- give the industry the flexibility to lower fares below meter rates in off-peak hours for app-hailed taxi trips; and
- enable separate day and night vehicles for one plate.

Under this policy and the regulations of the PTB, taxi companies are permitted to operate vehicles under different brand names with different decals. All vehicles have the same operational requirements except that those operated as Kater Cabs will be available only through an app-based service.

Kater Cabs will be operated by Richmond Taxi, under their control and using the same drivers. Operating nine vehicles as Kater Cabs, under the licence for Richmond Cabs, complies with City bylaws and regulations. However, this type of operating model (a licensee operating vehicles with different identifying features and branding) is not specifically contemplated in City bylaws. With changes anticipated to ride sharing legislation at the Provincial level, staff recognize that this is an interim operating model and City bylaws will require updating once the Provincial regulations are changed.

Due to the upcoming changes, staff have informed Richmond Cabs that this model will be revisited in one year's time or sooner should new legislation be released at the Provincial level. This will give all parties time to assess this service and contemplate changes to legislation or City bylaws.

Financial Impact

None.

Conclusion

Richmond Cabs has received approval from the PTB to operate nine taxicabs under the brand name of Kater Cabs to offer app based ride hailing service. This model is compliant with City bylaws but will be reviewed in a year, or at such time as new legislation is introduced at the Provincial level.



Carli Williams, P.Eng.
Manager, Community Bylaws and Licencing
(604-276-4136)

- Att. 1: PTB Licence Approval for Richmond Cabs Ltd.
2: Operational Policy: Modernizing Taxi Regulation, 2018



Licence Application Decision

Taxi Modernization– Additional Vehicles

Application #	AV3227-18	Applicant	Richmond Cabs Ltd.
Trade Name	Richmond Taxi		
Principals	AYUB, Muhammad KANG, Bhupinder Singh SADHRA, Paramjeet Singh SANDHU, Harpal Singh	JANDA, Avtar Singh RANDHAWA, Nirbhai Singh SANDHU, Yadwinder Singh	
Address	2440 Shell Road, Richmond BC V6X 2P1		
Primary Areas of Operation	Richmond, YVR		
Current Licence	PT Licence # 70391 Special Authorization: Passenger Directed Vehicle Passenger.		
Publication of Application	November 9, 2018		
Deadline for Submissions	November 14, 2018		
Submitters (and representatives)	None		
Board Decision	<p>The following are approved as set out in this decision:</p> <ul style="list-style-type: none"> • 16 additional vehicles, of which 7 are wheelchair accessible vehicles • 128 additional vehicles to be operated as single-shift paired vehicles 		
Decision Date	November 23, 2018		
Panel Chair	Catharine Read		

I. Introduction

Richmond Cabs Ltd. dba Richmond Taxi is applying to add 17 additional vehicle to its fleet under the Passenger Transportation (PT) Board's [Operational Policy: Modernizing Taxi Regulation, 2018](#). This policy allows taxi licensees to submit an application to expand their fleet by up to 15%.

Richmond Taxi has a current fleet size of 112 taxis, of which 15 must be wheelchair accessible taxis.

II. Jurisdiction and Proceedings

This application is made under the *Passenger Transportation (PT) Act*. The PT Act regulates the licensing and operation of commercial passenger transportation vehicles in B.C. Under the PT Act, the PT Board makes decisions on applications for passenger directed vehicles, which include taxis.

Section 26 (2) of the Act requires the Board to publish the fact and nature of applications and section 27(3) requires the Board to consider the applications and any written submissions it receives as result of publication. Section 27(5) says that people who make submissions are not entitled to disclosure of further information, unless the Board orders otherwise.

III. Taxi Modernization

In October 2017, the Government of British Columbia hired taxi industry expert Dr. Dan Hara to consult with and help prepare the taxi industry for a made-in-B.C. solution to ride-sharing. The Passenger Transportation (PT) Board reviewed a near final draft of the report, [Modernizing Taxi Regulation](#), from Hara & Associates at its June 2018 Board meeting. The Board decided that it supported the report in general, subject to hearing from the taxi industry and affected stakeholders. The three short-term action items recommended by the report that fall under the PT Board's purview are:

- Allowing existing licensees a one-time opportunity to increase their number of taxi vehicles (plates) by up to 15% in the near term;
- Giving the industry the flexibility to lower fares below meter rates in off-peak hours for app-hailed taxi trips; and
- Increasing efficiencies at shift change through separate day and night vehicles.

In August and early September 2018, the PT Board met with 55 taxi licensees in 7 cities across the province, and obtained additional taxi industry input from 30 BC taxi licensees and 160 BC taxi drivers through online surveys. Further, the PT Board met with UBCM staff, the Disability Alliance of BC, the Council of Senior Citizen Organizations of BC, and some ridesharing companies.

On September 7, 2018, the PT Board approved the report [Taxi Modernization Short-Term Actions: Results of Consultations & Recommendations to the PT Board](#), (the PT Board Consultation Report) that outlines consultation findings and actions that the PT Board is taking in response to the Hara recommendations.

On September 17, 2018 the Board issued its [Operational Policy: Modernizing Taxi Regulation, 2018](#), which sets policy and process to guide implementation of short term actions to modernize the taxi industry recommended by the Hara Report. This Policy identifies how the taxi supply increase will be undertaken and policy associated with designating vehicles as single shift paired vehicles.

(a) Procedural Matters

I am conducting this proceeding by way of a written hearing.

(b) Background

The applicant submitted requisite forms, including:

- Company Summary;
- Signing Authority;
- Special Authorization Licence Application;
- Taxi Modernization Supply Increase Form;
- Municipal Notices;
- Disclosure of Unlawful Activity & Bankruptcy, for all company principals; and
- Declarations, for all company principals.

IV. Board Mandate

Section 28(1) of the *Passenger Transportation Act* says that the Board may approve the application, if the Board considers that:

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- (a) there is a public need for the service the applicant proposed to provide under any special authorization;
 - (b) the applicant is a fit and proper person to provide that service and is capable of providing that service; and
 - (c) the application, if granted, would promote sound economic conditions in the passenger transportation business in British Columbia.

V. Submissions & Replies

There were no submissions to this application.

VI. Reasons for the Board's Decision

1. *Public Need and Sound Economic Conditions in the Passenger Transportation Industry*

The applicant relied on the PT Board Consultation Report to demonstrate public need.

In early 2018, the Select Standing Committee on Crown Corporations of the BC Legislature inquired into ridesharing in BC. It issued its [Report](#) in February 2018. The Committee members agreed that Transportation Network Companies (TNCs) should be permitted to operate in British Columbia within a provincial regulatory regime. Government has publicly stated that it intends to introduce legislation to allow the entrance of ridesharing to British Columbia in the Fall Session of 2018. This gives the Board confidence that the implementation of ridesharing is imminent.

The evidence on public need for the Board to grant a 15% increase in taxi vehicles (plates) includes:

- Industry consensus as documented in the PT Board Consultation Report. The near unanimous consensus expressed by BC taxi licensees in both meetings and surveys is evidence in itself. Individual taxi companies see the potential demand for additional taxis. The strong degree of consensus is indicative of a general need for additional taxis under current conditions with or without the introduction of TNCs. The need for additional taxis was also voiced by taxi drivers, Council of Senior Citizen Organizations of BC, Disability Alliance of Canada and TNC companies.

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- Expansion of trip volumes in other cities and jurisdictions. In other cities, following the introduction of TNCs, the combined increase in passenger trips of taxis and TNC expands significantly. This quantitative evidence is demonstrated in the study entitled Modernizing Taxi Regulations by Hara and Associates.
 - Preservation of consumer choice. Taxi service and TNC service are different. The Hara Report noted that in other jurisdictions where TNCs are admitted, most taxi fleets remain in full operation, but are constrained by regulatory limits on fleet size. In combination with the significant anticipated increase in the volume of trips, preservation of consumer choice requires an expansion of available taxi service.

The applicant has a fleet size of 112 vehicles. It has applied for 17 additional taxis. This is not within the Board's Operational Policy on taxi modernization as rounding up of percentages is not permitted. Richmond Taxi is approved for 16 additional plates.

Currently 17% of taxis in the applicant's operating area are wheelchair accessible taxis. Richmond Taxi currently has 15% of its fleet designated as wheelchair accessible. To keep the distribution of wheelchair accessible taxis among companies equitable, 7 of the 16 additional vehicles approved under this policy are for wheelchair accessible taxis.

I am satisfied that there is a public need for this service and approval of the application will promote sound economic conditions in the passenger transportation industry in British Columbia.

Richmond Taxi is approved for 128 single shift paired vehicles to address shift change efficiencies as it operates in a congested area making shift change difficult.

2. Is the applicant a fit and proper person to provide that service and is the applicant capable of providing that service?

The Board looks at fitness in two parts:

- (i) is the applicant a "fit and proper person" to provide the proposed service; and
- (ii) is the applicant capable of providing that service?

Richmond Taxi is incorporated, in Active standing and has filed all required reports. The Disclosure of Unlawful Activity and Bankruptcy forms were completed to the satisfaction of

the Board. The Declarations form related to the Liquor Control and Licensing Act was completed.


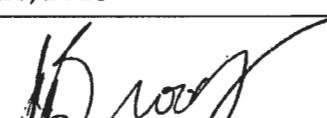
The company was issued a National Safety Certificate and has a Safety Rating of Unsatisfactory – Unaudited. There are no complaints or administrative penalties against the company. Upon request from the Board, the company provided a plan to address the deficiencies in its CVSE Carrier Safety Profile. The plan includes an Action Plan for drivers, hours of service, vehicles and their maintenance, along with Company Rules and Regulations related to safety.

With this in place, I find that the applicant is fit and proper and capable of providing this taxi service.

VII. Conclusion

For the reasons above, this application is approved for the addition of (a) 16 vehicles of which 7 must be wheelchair accessible, and (b) 128 single shift paired vehicles pursuant to terms and conditions set out in this decision.

I establish the activation requirements and the terms and conditions of licence that are attached to this decision as Appendices I and II. These form an integral part of the decision.

Signature of Panel Chair	
Date	November 23, 2018
Entered & Sealed by the Director	

Appendix I
Activation Requirements
Richmond Cabs Ltd.

<p>Approval of application may expire</p>	<ol style="list-style-type: none"> 1. Other than the single shift paired vehicles, the licensee must activate any additional conventional vehicles approved in this decision within 3 months of the date of this decision and any wheelchair accessible taxis within 6 months of the date of this decision. 2. Other than single shift paired vehicles, any additional vehicles that have not been activated within the timelines set out in 1 above are no longer approved and; <ol style="list-style-type: none"> a. the base maximum fleet size of the licensee is reduced accordingly; and b. the total maximum fleet size of the licensee is reduced to a number that is double the base maximum fleet size. 3. The Passenger Transportation Board may vary the requirements set out in 1 above, pursuant to section 12 of the Board's Operational Policy: Modernizing Taxi Regulation, 2018. <p><i>Note: "activate" means that the applicant has submitted the documents required to obtain a Special Authorization Vehicle Identifier to the Registrar of Passenger Transportation.</i></p>
<p>Notice to Registrar</p>	<p>The Registrar must not, without direction from the Board, issue the applicant any additional special authorization vehicle identifiers if the applicant has not activated the vehicles pursuant to section 1 above.</p> <p><i>Note: "activate" means that the applicant has submitted the documents required to obtain a Special Authorization Vehicle Identifier to the Registrar of Passenger Transportation.</i></p>

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Appendix II
Terms and Conditions of Licence
Richmond Cabs Ltd.

Special Authorization PASSENGER DIRECTED VEHICLE (PDV) Terms & Conditions	
Vehicles	
Maximum Fleet Size	<p>Base Maximum Fleet Size:</p> <ol style="list-style-type: none"> 1 <u>At any time</u>: 126 vehicles of which 104 may be conventional taxis. All other vehicles are accessible taxis. 2 <u>YVR Contract</u>: <ol style="list-style-type: none"> a. The licensee may operate an additional 2 conventional taxis if the Vancouver Airport Authority (VAA) has approved airport licences for 71 or more vehicles in fleet of the licensee. b. When making application for renewal of its licence, Richmond Cabs Ltd. must submit a letter to the Registrar of Passenger Transportation from Ground Transportation, Vancouver Airport Authority, stating that its contract with Richmond Cabs Ltd. remains in good standing. c. The letter referred to in (a) must confirm the number of airport licences approved for Richmond Cabs Ltd. d. If the number of airport licences is 71 or less, the licensee must return 2 identifiers for conventional taxis to the Registrar. <p>Maximum Fleet Size With Single Shift Paired Vehicles:</p> <ol style="list-style-type: none"> 3 Up to 254 vehicles (128 pairs) may be designated as single shift paired vehicles in which case the maximum fleet size may increase up to 254 vehicles.
Vehicle Capacity	Vehicles can accommodate a driver and not less than 2 and not more than 7 passengers.
Single Shift Paired Vehicles	<ol style="list-style-type: none"> 1. Vehicles may be operated as single shift paired vehicles as long as the: <ol style="list-style-type: none"> a. single-shift paired vehicles are marked in a manner that complies with applicable vehicle identification rules, specifications and orders of the Passenger Transportation Board; b. single-shift paired vehicles that are accessible are paired with another accessible vehicle; and c. licensee keeps an accurate, up-to-date written or digital record of (i) all vehicles that are designated, and (ii) the shift start time and shift end time of each single-shift paired vehicle.

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	2. No two vehicles that are operated as a pair of single-shift paired vehicles may be on the road at the same time unless one of the vehicles is completing a trip that began near the scheduled end of the shift for that vehicle.
Specialty Vehicles	The accessible taxis must be operated in accordance with the <i>Motor Vehicle Act Regulations</i> including Division 10 (motor carriers) and Division 44 (mobility aid accessible taxi standards), as amended from time to time, and in accordance with any other applicable equipment regulations and standards.
Flip Seat Authorization	Accessible taxis may be equipped with flips seats that are installed in accordance with Division 10.07(5) of the <i>Motor Vehicle Act Regulations</i> .
Service Priority Limitation	Persons with mobility aids who require the accessible taxi for transportation purposes are priority clients for the dispatch of accessible taxis. The licensee must at all times use a dispatch and reservation system that dispatches accessible taxis on a priority basis to clients who have a need for accessible vehicles.
Minimum Operating Requirement	Licensees must ensure that accessible taxi service is available to passengers throughout a 24 hour day in a reasonable manner and that accessible taxi availability is, at a minimum, proportionate to conventional taxi availability.
Service 1	
The following terms and conditions apply to Service 1	
Originating Area	Transportation of passengers may only originate from any point in the City of Richmond, including the Vancouver International Airport.
Destination Area	Transportation of passengers may terminate at any point in British Columbia.
Return Trips	The same passengers may only be returned from where their trip terminates in the destination area to the City of Richmond, excluding the Vancouver International Airport, if the return trip is arranged by the time the originating trip terminates.
Reverse Trips	Transportation of passengers may only originate in the destination area if the transportation terminates in the City of Richmond, excluding the Vancouver International Airport, and the cost of the trip is billed to an active account held by the licence holder that was established before the trip was arranged.
Service Limitation	A minimum of 2 accessible taxis must be operated and available for hire 24 hours each day every day of the week.

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Service 2	
The following terms and conditions apply to Service 2	
Originating Area	Transportation of passengers may only originate from any point in the City of Richmond including the Vancouver International Airport.
Destination Area	Transportation of passengers may terminate at any point beyond the British Columbia/United States border when engaged in an extra-provincial undertaking.
Other	
The following terms and conditions apply to all vehicles	
Taxi Cameras	Taxi camera equipment may only be installed and operated in vehicles when the licensee is in compliance with applicable taxi camera rules, standards and orders of the Passenger Transportation Board.
Taxi Bill of Rights	<ul style="list-style-type: none"> a. A Taxi Bill of Rights issued by the Ministry of Transportation ("Taxi Bill of Rights") must be affixed to an interior rear-seat, side window of each taxicab operated under the licence. b. The Taxi Bill of Rights must at all times be displayed in an upright position with the complete text intact and visible to passengers. c. Licensees may only display a current Taxi Bill of Rights.
Eco-Friendly Taxis	Any additional non-accessible vehicles approved for this licence on or after June 11, 2007 and for which a passenger transportation identifier is issued, must be operated as 'eco-friendly taxis' as defined by Board Policy Guidelines in effect at the time the vehicle is issued a passenger transportation identifier.
Express Authorizations	<ul style="list-style-type: none"> (i) Vehicles must be equipped with a meter that calculates fares on a time and distance basis. (ii) Vehicles may be equipped with a top light. (iii) The operator of the vehicle may, from within the originating areas only, pick up passengers who hail or flag the motor vehicle from the street.
Taxi Identification Code	Each vehicle operated by the licensee must have a unique taxi identification code (TIC) affixed to the inside and outside of the vehicles in a manner that complies with applicable rules, specifications and orders of the Passenger Transportation Board.
Transfer of a licence	This special authorization may not be assigned or transferred except with the approval of the Board pursuant to section 30 of the Passenger Transportation Act.

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Attachment 2



Operational Policy:

Modernizing Taxi Regulation, 2018

Purpose:

To set the policy and process to guide implementation of short term actions to modernize the taxi industry recommended by the Hara Report, namely,

- allow existing licensees a one-time opportunity to increase their number of taxi vehicles (plates) by up to 15% in the near future;
- give the industry the flexibility to lower fares before meter rates in off-peak hours for app-hailed taxi trips; and
- enable separate day and night vehicles for one plate.

Legislation:

The Passenger Transportation Act (PTA) regulates the supply of taxis. The Board may approve an application for additional taxis if it considers that:

- There is a public need for the service;
- The applicant is a fit and proper person and capable of providing the service; and
- The application would promote sound economic conditions in the passenger transportation business in the province

Under the PTA, the Board may approve rates charged by a licensee operating passenger directed vehicles.

Context:

The British Columbia government has announced that it will introduce legislation in the fall session of 2018 to modernize taxi regulation and make way for the introduction of Transportation Network Companies (TNCs). As part of the background work, the Minister of Transportation and Infrastructure (MOTI) commissioned a study entitled *Modernizing Taxi Regulation* by Hara and Associates. The report included three recommendations for short term action by the Board. In June 2018, the Board approved the three actions in principle subject to consultation with stakeholders. The consultation results are in a report called *Taxi Modernization: Short-term Actions, Results of Consultation & Recommendations* to the PT Board. These results form the basis for the operational policy below.

Given the context and circumstances of the short-term actions, the PT Board will not require applicants to submit detailed operational data and public need indicators with their applications.

Policy:

1. This policy applies to licensees
 - (a) whose licence
 - i. contains a Special Authorization: Passenger Directed Vehicle
 - ii. contains express authorization to allow an operator to pick up passengers who hail or flag the motor vehicle from the street; and
 - (b) who were approved by the PT Board to operate on or before July 19, 2018.
2. In calculating the 15%, the Board will use the maximum fleet size stated on a licence as of July 19, 2018.
3. Any licensee whose licence as of July 19, 2018 authorized a maximum fleet size of 14 or more vehicles may apply to increase its fleet size by up to 15%.
4. Any licensee whose licence, as of July 19, 2018, authorized a maximum fleet size of between 4 and 13 vehicles may apply to increase its fleet size by one vehicle.
5. Any licensee whose licence, as of July 19, 2018, authorized a maximum fleet size of 3 vehicles or less may affiliate with one or more licensees and submit a joint application to receive additional vehicles pursuant to paragraphs 3 and 4 above, as long as:
 - a. The total number of vehicles that all licensees affiliating in the application are currently licensed to operate is 3 vehicles or less;
 - b. All licensees affiliating have the same originating area on their individual licences;
 - c. All licensees will declare
 - i. on whose licence the additional taxis will be assigned, or
 - ii. the name of the new legal entity under which the taxis will operate; and
 - d. The applicant demonstrates to the satisfaction of the Board that granting the request will not result in an increase in taxis of more than 15% plus one in the relevant operating area.
6. Notwithstanding paragraph 5 above, if the licensee affiliates operate under a common dispatch service and trade name, the maximum number of additional vehicles that may be approved will not exceed 15 % of the total vehicles operating under the common dispatch or trade name, unless the Board orders otherwise.
7. Any licensee:
 - (a) operating as the only taxi service in a community with a population of less than 2,000 people,

- (b) whose licence as of July 19, 2018, authorized a maximum fleet size of three vehicles or less, and
 - (c) whose licence has an originating area breadth of 25 kilometres or moremay apply to increase its maximum fleet size by one vehicle.
- 8. Applicants must declare the principal dispatch company and brand used by each licensed vehicle at present and, if different, on July 19, 2018.
- 9. Percentages will not be rounded up.
- 10. The Board, at its sole discretion, may require one or more vehicles approved under this policy to be a wheelchair accessible taxi. The Board will consider:
 - a. Opportunities to expand the number of accessible taxis in areas with a low percentage of taxis relative to the need for these vehicles; and
 - b. Opportunities to more equitably distribute the percentage of accessible taxis among companies in an operating area.
- 11. All non-wheelchair accessible taxis must be activated within 3 months and all wheelchair accessible taxis must be activated within 6 months, unless otherwise ordered by the Board.
- 12. Licensees must request any extension:
 - (a) prior to the end of the activation period specified in paragraph 11, and
 - (b) must demonstrate to the Board's satisfaction what factors are obstacles to plate activation.
- 13. All applications for additional vehicles under this policy must be submitted to the [Passenger Transportation Branch](#) , using this streamlined package, by October 19, 2018. After October 19, 2018, application processes and requirements stated in the PT Board's [taxi application guides](#) apply.
- 14. Notwithstanding section 13, the Board may accept a late application if delays beyond the applicant's control occurred.
- 15. The PT Board may consider together applications received from licensees serving in the same or similar geographic areas.
- 16. Licensees will have the flexibility to lower fares below meter rates in off-peak hours for app-hailed trips as of September 1, 2019.
- 17. The Board will permit licensees to increase their maximum fleet size to designate vehicles as

single shift paired vehicles. Single shift paired vehicles are two vehicles pairing together for the purpose of operating separate shifts, rather than one vehicle covering 2 shifts.

18. Licensees must keep a written or digital record of
 - (a) The two vehicles that are paired; and
 - (b) The start and end times of all single shift paired vehicles.
19. Unless the driver is completing a trip that started before the end of a specified shift, single shift paired vehicles may not be on the road at the same time.
20. For identification and enforcement purposes, single shift paired vehicles are required to have a specified "identification code" on their vehicles pursuant to Board rules.

Effective Date: September 17, 2018