

Licence Amendment Decision

Application:	305-12		
Applicant:	Greyhound Canada Transportation ULC		
Address:	1111 International Blvd, Suite 700, Burlington ON L7L 6W1		
Principals:	KENDRICK, Stuart J.	LEACH, David	
Current Authorization:	Passenger Transportation Licence 70414, "Special Authorization: Inter-city Bus"		
Type of Application:	Amendment of Licence <i>(Section 31 of the Passenger Transportation Act)</i>		
Application Summary:	<p>Reduce Minimum Route Frequency on 15 Routes:</p> <p>A Alberta – Vancouver (Highway 1) B2 Kelowna – Penticton C Vancouver to Rock Creek D Kelowna – Alberta (Highway 3) E Prince George – Vancouver G Alberta – Dawson Creek (Highway 2) I1 Dawson Creek – Fort Nelson J Dawson Creek – Prince George K Prince George – Ft. St. James L1 Prince Rupert – Prince George N Alberta – Vancouver (Highway 16) P Kelowna – Vancouver S1 Vancouver – Mt. Currie T Victoria – Nanaimo U Nanaimo – Campbell River</p> <p>Eliminate 1 Route:</p> <p>X Victoria – Mt. Washington Alpine Resort</p>		
Board Decision	<p>The Board approves, as proposed by the applicant:</p> <ul style="list-style-type: none"> • The reduction in minimum route frequency on 15 of its routes • The elimination of Route X <p>The Board is revising terms and conditions for Route C, including the terminating points, as set out in the decision. As well, it is setting public notice requirements for implementing changes as follows:</p> <ul style="list-style-type: none"> • 21 days for Route S1 • 7 days for Route X • 14 days for all other Routes 		
Decision Date	January 10, 2013 (as amended January 15, 2013)		
Amendment	After the decision was sent to the applicant and before publication, revisions were made to some tables (figures) and surrounding text in Section VI "Route Specific Analysis". These revisions do not affect the substance of the decision. This is the official version of the decision.		
Panel Chair	William Bell	Panel Member	Spencer Mikituk

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PART ONE: CONTEXT

I. Structure of Decision

The decision is divided into three parts.

Part One provides background information on the application history and publication as well as information the Board considered in its review of the application.

Part Two outlines the Board's statutory considerations and provides general comments on these as they apply to this application. This is followed by a more detailed review of specific routes which includes an overview of public comments.

Appendices include the schedule details received from the applicant and revised terms and conditions of licence.

II. Background

A. Licensing & Application Context

Greyhound Canada Transportation ULC (GCTU) is a commercial enterprise that holds a Passenger Transportation Licence with a General Authorization and a Special Authorization. The Special Authorization allows GCTU to operate inter-city buses (ICBs) on 19 routes in British Columbia. The application pertains to the Special Authorization licence.

With ICBs, the Board establishes route points (usually municipalities), a minimum frequency for service at each point, and terms and conditions for operating ICB services. ICB operators may exceed the minimum route frequency set out in their Passenger Transportation Licence. The Board does not approve time schedules, although ICB operators must publish schedules. Rates for ICB transportation services are not subject to Board approval.

GCTU has applied to the Passenger Transportation Board (the "Board") to amend its terms and conditions of licence. The company proposed the elimination of one route and a reduction in minimum service levels on 15 other routes.

Terminology in this Document

"Route" refers to an inter-city bus route as set out in the terms and conditions of GCTU's Passenger Transportation Licence. As an example from this application, Route P in the GCTU licence specifies communities that must be served between Vancouver and Kelowna.

"Minimum Route Frequency" refers to the minimum route frequency that is set or approved by the Board and set out in a Passenger Transportation Licence. As an example from this application, GCTU applied to reduce the minimum route frequency between Vancouver and Kelowna (Route P) in its licence from 3 trips daily in each direction to 2.

Terminology in this Document *(continued)*

“Schedule” refers to a schedule that specifies the route points as well as the days and times when a licensed inter-city bus operator picks up and drops off passengers along the route. As an example from this application, GCTU proposes to eliminate its schedules 5029 and 5038 if the Board approves its proposed reduction in minimum route frequency in its Passenger Transportation Licence. These specific schedules are set by GCTU and not subject to Board approval. However, GCTU is required to post and operate schedules that comply with the terms and conditions of its Passenger Transportation Licence. The terms and conditions include the minimum route frequency that was established by the Board.

“FY” means “fiscal year” and **“FY12”** (for example) refers to the applicant’s fiscal year 2012.

“GCTU” means Greyhound Canada Transportation ULC

“ICB” means inter-city bus.

“RPM” means revenue per mile.

B. Claim of Urgent Public Need

The Board received GCTU’s application 305-12 UPN on August 28, 2012. The applicant asked the Board to process the application on the basis of “urgent public need” (UPN). Under section 26(3) of the *Passenger Transportation Act*, if the Board is satisfied that there is an urgent public need for a service, the Board does not have to publish or accept submissions on the application. Otherwise, applications must be published and submissions accepted.

The Board did not accept GCTU’s claim of urgent public need. It stated the following in its UPN decision of August 31, 2012:

In approving applications from Greyhound, including minimum route frequency reductions, the Board has found that the approved minimum route frequencies meet a public need. The present application is comprehensive and will affect many communities in British Columbia. Publishing such an application is in the public interest. If the Board were to process this application as a UPN, it would result in circumventing the opportunity for public input.

The Board is sensitive to the urgency presented by Greyhound. The Board is reviewing its application processes and, where feasible, will modify these to enable timely processing of the application.

The Board will publish the Greyhound application and process it on a priority basis.

After the Board sent the UPN decision to the applicant, GCTU asked the Board to delay the publication of its application until the Board had completed its review of application processes and Greyhound was prepared to proceed.

On September 5, 2012, the Board adopted streamlining measures for ICB applicants seeking to reduce service. The Board posted information about the process changes on its website on September 26, 2012.

C. Publication

The UPN decision and this application were published in the Board's *Weekly Bulletin* on October 3, 2012. These were also posted on the Board's bus route application web page (www.th.gov.bc.ca/ptb/bus.htm) along with an Explanatory Paper prepared by GCTU. In addition to the notices and information posted on the Board website, the Board required that GCTU do the following for a 14-day period:

- post notices for each proposed change as well as its Explanatory Paper on a prominent location on GCTU's English-speaking website
- post notices at terminals, depots and agents' premises
- provide written notice to municipal and regional district governments that are affected by a proposed change

The deadline for comments was October 17, 2012.

D. Re-Publication

On October 9, 2012, the Board was advised by GCTU that schedules distributed as part of its application summary did not accurately identify the current and proposed frequencies of bus service. Corrections were received and republished October 10, 2012. The public notice period of 14 days re-started. The Board required GCTU to resend and repost all of its notices with updates. The new deadline for comments was October 24, 2012.

III. Information & Comments Considered

A. Information Considered

The Board considered information from the following sources:

- Application materials received from GCTU, including current and proposed schedules
- GCTU's Explanatory Paper that explains its proposed licensing changes and its rationale for seeking the changes
- Comments received from the public within time frames specified by the Board and some late submissions which the Board accepted
- GCTU's comments in reply to public comments

B. Application Materials and Explanatory Paper

GCTU provided its rationale for the application in its application materials as well as the public Explanatory Paper.

GCTU states that it lost \$14.1 million on scheduled passenger operations in British Columbia during the Company's 2011/12 fiscal year (fiscal year 2012, or "FY12") that ended March 31, 2012.

GCTU describes the losses as "unsustainable" and attributes them to the following factors:

- higher costs for fuel and maintenance
- reduced ridership
- an inflexible provincial regulatory regime that does not allow GCTU to respond quickly to market and economic changes
- unregulated competition from provincial agencies including BC Transit and the Interior and Northern Health Authorities

GCTU's application proposes to eliminate Route X (Victoria – Mt. Washington) and reduce service levels on 15 routes. According to GCTU, the changes would, if approved, eliminate about "2.2 million operating miles in BC and generate yearly operating savings of approximately \$6.75 million."

For 2011/12, \$5.69 marked "the Company's fully loaded breakeven cost per mile" and that "fully loaded costs include bus operating costs, selling costs, field and corporate overhead and depreciation." The applicant cited ongoing unsustainable passenger operating losses in BC as the reason for the proposed reductions in service. GCTU states that approval of its proposed changes would make it possible for GCTU to continue its inter-city bus passenger operations in BC. Further, GCTU states it would continue to operate 6.7 million miles of scheduled bus service in the province.

The Explanatory Paper makes additional statements regarding the Northern Health Connections medical transportation service and BC Transit.

Northern Health Connections

GCTU states that Northern Health Authority has engaged a private company to operate its Northern Health Connections bus service. This service connects people in smaller communities with medical services in larger population centers. GCTU states that fares are subsidized by 80% to 90% without policing to ensure that only passengers with a physician referral are able to travel on NH Connections bus services. The Northern Health Connections bus services overlap with the following routes which GCTU seeks to reduce service:

- A Alberta border – Vancouver
- E Prince George – Vancouver
- G Alberta – Dawson (Highway 2)
- I1 Dawson Creek – Fort Nelson
- J Dawson Creek – Prince George
- K Prince George – Ft. St. James

L1 Prince Rupert – Prince George
N Alberta – Vancouver (Highway 16)

The Northern Health Corporate Office wrote to the Board to clarify statements made by GCTU in its Explanatory Paper. Northern Health clarified that:

- it contracts with the holder of a Passenger Transportation Licence, Diversified Transportation, which operates most of its Northern Health Connections Patient Transportation System
- all trips must be pre-booked through a call centre operated by Diversified Transportation Ltd. and subject to appointment verification
- 99.3% of trips on Northern Health Connections have been verified as medical trips by way of a form which is obtained before a trip or, for practical logistical reasons, sometimes after a trip
- Passengers who fail to supply verification are flagged to require pre-trip verification next time

The Board notes that Diversified Transportation Ltd. holds Passenger Transportation Licence 70459 with General Authorization to operate general passenger vehicles. GCTU provided this reply to comments from the Northern Health Corporate Office:

While GCTU is pleased to learn that Northern Health has tightened its trip verification requirements, the fact remains that riders on Northern Health's extensive bus services were very likely GCTU customers in the past. The 2009 Northern Health Annual report at page 19, indicates that in 2006, the first year that the NH Connections operated, 3,000 riders utilized the service. By comparison, a Northern Health news release issued on September 24, 2012 stated that more than 12,000 riders utilized the service in 2011. In other words, in the five year period 2006-11, ridership on the Northern Health Connections scheduled bus service has increased fourfold. There can be little argument that there are only a finite number of inter-city bus riders in sparsely populated Northern BC. Simply put, GCTU, an unsubsidized private sector carrier, cannot compete with a heavily subsidized public sector sponsored operation like the NH Connections bus service.

GCTU further inserted this quote from the Healthlink BC website about NH connection fares:

Return fares range from \$20 for short trips to \$80 for the longest trips. There are no taxes or fees on any NH connection fares. **The actual cost of travel is 80-90 per cent subsidized by Northern Health.** (Emphasis added by GCTU)

BC Transit & Interior Health Authority

GCTU's Explanatory Paper points out that BC Transit "operates Health Connections Bus Service under contract to the Interior Health Authority throughout that Health Authority's vast operating area, south of Prince George and east of Hope." GCTU further states that "no doctor's referral of any kind is required to access these heavily subsidized and unregulated BC Transit services."

The BC Transit website states that the Health Connections Bus Service provides transportation for “non-emergency medical appointments.” In Greyhound’s reply of November 1, 2012, it quoted the BC Transit website regarding Health Connection service between Nelson, Castlegar and Trail: “Although medical appointments have priority, everyone is eligible to use this service if space is available.”

C. Public Comments

The deadline for public comments and submissions was October 24, 2012. More than 180 letters and emails were received by the deadline, forwarded to the applicant and reviewed by the Board. Many of the letters and emails commented on more than one route. Comments considered by the Board were forwarded to the applicant for its review and reply to the Board.

After the deadline, new letters and emails continued to arrive at the Board office. The Board decided that all comments and submissions received by 1:00 p.m. on October 31, 2012 – 12 in total – would be considered. Thus, a total of twelve letters and emails were forwarded to the applicant on October 31, 2012.

Rule 11 (Late Submissions) of the Board’s *Rules of Practice and Procedures* states that the Board may accept a late submission if it “is likely relevant to the Board’s consideration of the application” and if it could “assist the Board in its decision-making process”. The Board accepted five additional late submissions. These were forwarded to the applicant on November 23, 2012.

In total, more than 200 submissions were received and considered by the Board. The Board refused to consider 11 late submissions. Further, the Board decided not to consider more than 500 emails generated through an online petition created by Jim Sadlemyer of Nanaimo, British Columbia, which refers to the Canadian Auto Workers (CAW’s) opposition to the GCTU application. These website-generated emails were received after October 31, 2012, and did not contain specific information that could assist the Board in its deliberations.

The Board will address specific comments in its discussion of individual routes. Generally, public comments can be summarized as follows:

- Reliance on GCTU service by people of certain demographics who do not or cannot drive (e.g. the elderly, students, low or fixed income individuals) for travel to urban areas to access medical , school, friends and family or other business or personal services
- Scheduling inconveniences and costs caused by service reductions including connections to hub or larger urban cities
- Lack of transit or other transportation options in some communities
- Use of GCTU service to move or commute workers between home and workplaces

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- The negative impact of reduced GCTU services on local economies or First Nations communities that depend on the transportation of goods, service and travelers
 - Implications for freight or parcel delivery. In several instances writers cite dependence on these services to transport water and blood samples for testing
 - Reductions in service will increase safety risks associated with a rise in hitchhiking on some routes particularly those on Highway 16 and, in other cases, travel using cars in winter conditions
 - Environmental concerns with reductions in service that mean keeping more personal vehicles on the road with less reductions in carbon emissions
 - GCTU's operating losses are the result of its aging fleet and high maintenance costs, a lack of consultation with local communities, poor customer service, marketing and scheduling
 - The perceived monopoly by GCTU on inter-city bus services in B.C.

D. Applicant Reply to Public Comments

GCTU made the following points in its reply of November 1, 2012:

- Even if this application is approved in its entirety, GCTU will continue to provide scheduled bus service on each year-round route it operates in B.C.
- Wherever possible, the schedules proposed for elimination on a particular route are the ones with the lowest ridership
- GCTU can no longer be all things to all people. It is an inter-city bus company, not an inter-community transit service
- It is simply impossible for GCTU to design an inter-city bus network that will provide the connectivity, schedule frequency and times desired by each of its prospective bus riders
- Except for the volume of submissions from local commuters residing along the Sea-to-Sky Corridor (Squamish – Whistler – Pemberton), there were surprisingly few submissions from concerned riders on a route-by-route basis
- Little weight should be given to the submissions from local and regional governments that bus service should be maintained in their areas even if GCTU is losing money. These objections do not establish that any public need for bus service asserted in the submissions can be operated profitably by GCTU
- The test set out in s. 28(1)(c) of the *Passenger Transportation Act* is that the sound financial health of the applicant must be considered by the Board when adjudicating an application as opposed to the social and economic consequences that may result from a frequency reduction
- GCTU does not hold a monopoly on inter-city bus service in B.C.
- No community will lose its existing “GCX” freight service if the application is approved
- While connecting small communities with larger population centers is a laudable goal, actual ridership numbers need to be the guiding consideration when setting minimum route frequency

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- GCTU will invest in upgraded equipment in B.C. when it sees a real prospect of profitability in this Province

PART TWO: BOARD CONSIDERATIONS, ANALYSIS AND FINDINGS

IV. Legislation

The Board may approve an application forwarded to it by the Registrar of Passenger Transportation if the Board considers, as set out in section 28(1) of the Passenger Transportation Act, that:

- (a) there is a public need for the service the applicant proposes,
- (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.

The Board may approve an application if it considers the application and concludes “yes” to all three.

V. Findings

Below, the Board will provide general findings with respect to fitness, sound economic conditions and public need on this application. Following this, the Board will discuss specific routes, particularly with regard to public comments received and ridership and revenue information provided by GCTU.

A. Applicant Fitness

When an applicant proposes to reduce service, the Board is likely to apply the logic that the licensee is a fit and proper person to provide the service proposed unless there is compelling evidence to the contrary.

GCTU has operated scheduled bus services in British Columbia for decades. The application materials included 4 complaints logged by the Passenger Transportation Branch. All appeared to have been addressed. No administrative penalties were issued. As well, some public comments on this application referred anecdotally to quality of service issues and the use of older buses. In the absence of compelling evidence to the contrary, the Board finds that GCTU is a fit and proper person to provide its licensed service and is capable of providing the service.

B. Sound Economic Conditions

The Board must consider whether approving the application would promote sound economic conditions in the passenger transportation business in British Columbia. This includes, but is not limited to, the financial health of the applicant seeking a minimum route frequency reduction or a route or route point elimination. The Board reviews such things as:

- the financial performance of the applicant
- ridership on the inter-city bus
- other transportation options that may be available

The Board received submissions regarding the “social” consequences of Greyhound’s application. Of note, the Board received a submission from Local 114 of CAW-Canada in Victoria, B.C. that discusses the social and economic consequences of GCTU elimination of Route X and the service frequency reductions on Routes T, U and X. The submission describes expected impacts on employment and payroll, lost income and sales tax revenues, and increased collection of employment insurance benefits. It also describes other expected consequences for local economic activity, and the economic performance of GCTU’s remaining routes as a result of lost connector traffic and other network effects. It further predicts broader negative economic and social impacts to affected, isolated communities as a result of fewer transportation options and more environmental consequences. It states:

*In our judgment, these consequences outweigh the private fiscal savings attained by Greyhound as a result of the reduced or eliminated services. A reasonable condition of Greyhound having the right to operate a provincial transportation service is that it must consider the **social costs and benefits** of its actions. (emphasis added)*

The submission calls for a full public review of the financial performance of GCTU’s B.C. operations and, as necessary, public policy discussions regarding steps such as providing provincial subsidies to allow the continuance of adequate inter-city bus services.

The Board also notes other comments such as that from the Mayor of Prince Rupert who wrote, concerning route L and Highway 16, “...less frequency of service along this particular stretch of highway is not good for health and safety reasons.” And that from the Mayor of Valemount regarding route N who wrote:

In a time when the province of BC is advocating for accessibility, this reduction is counter-productive to this goal as citizens with challenges to driving are being restricted in mobility. In addition, provincial goals of reducing carbon emissions are less easily met if individual vehicles are on the road. And finally, a reduction in service will likely increase hitchhiking in remote areas, causing serious risk to vulnerable people.

The term “sound economic conditions” in the legislation is directed towards the “transportation business”. It does not relate to the broader social and economic consequences that might result from a frequency reduction. GCTU is a private, commercial company. It does not receive government subsidies. It provides scheduled bus transportation in much of British Columbia and elsewhere in Canada.

In past years, GCTU has experienced considerable losses on its B.C. operations. These have been noted in previous Board decisions, such as the decision on application X71-09, published December 3, 2009. GCTU reports that it lost \$14.1 million on scheduled passenger operations in British Columbia during the 2011/12 fiscal year ended March 31, 2012. The company states that this exceeds their total losses for Canada as a whole for fiscal 2009 (\$13.4 million).

With respect to this application, the Board must balance the likelihood of even greater and more intensified financial pressures for GCTU with the concerns of the public expressed about minimum route frequency reductions on 15 routes and 1 route elimination. In GCTU’s request to have its application processed on the basis of “urgent public need” and its Explanatory Paper, GCTU has detailed the ridership declines on many of its routes. It attributes these declines to urbanization that has depleted rural populations, changes that have made cars ubiquitous, the proliferation of government-subsidized public transportation services and regulatory regimes that do not enable inter-city bus operators to adapt to changes in market conditions. The Board accepts that these factors may have had some impact on ridership declines.

GCTU states that, if this application is not approved, it could be forced to halt its B.C. operations altogether whereby the existing public need for scheduled inter-city bus transportation would either go unmet or have to be filled by government subsidized services. The Board notes that the applicant requires approval to reduce minimum frequency or eliminate a route, and also that GCTU does not require approval to exit from the province completely.

A halt in B.C. operations is a hypothetical scenario and the Board is not in a position to speculate how government would respond or what the state of bus service would be. In such a scenario, opportunities may exist for other inter-city bus operators to enter or expand in the B.C. market. Despite the frequent characterization of GCTU’s service as a monopoly, anyone can apply to the Passenger Transportation Board to operate an inter-city bus service, regardless of whether or not there are existing carriers on a route. GCTU describes itself as an “inter-city scheduled bus service on major BC highways connecting significant city pairs in BC and also connecting BC with cities in Alberta and beyond.” It describes its business as unique with operating requirements that differ from those that apply to “inter-community transit”.

In some instances, despite some portions of some routes exhibiting positive ridership numbers, the overall financial health of the entire route and preservation of year-round scheduled bus service was a predominate consideration. Therefore, the Board placed

considerable focus on overall financial viability and ridership for whole routes affected by this application.

The Board accepts that GCTU's operations in British Columbia have been losing money. The Board finds that GCTU's current financial condition marks a critical crossroad where it faces the likelihood of continued losses. The company has stated it requires approval of this application "in order to significantly reduce its operating losses in B.C. and right-size its business." GCTU further notes that the average age of its BC bus fleet is 11.1 years and that the company will "invest in the capital required to update its fleet when it sees a real prospect of profitability in B.C."

The Board finds that granting the application in whole would allow GCTU to improve financial viability for the longer term in B.C. by pruning unsustainable schedules and enabling the continued operation of 6.7 million miles of scheduled bus service in the province. The Board finds that this would contribute to sound economic conditions in the transportation business in British Columbia.

C. Public Need

The Board must decide what level of service meets public need. If the Board determines that the proposed minimum route frequency will meet the public need, it may grant the application. If it determines that the proposed level will not meet the public need, then it may refuse the application or grant it in part in a manner that meets the public need. For the proposed elimination of a route, the Board may approve the application when the level of public need is not sufficient to justify continuation. If it finds that the level of public need justifies continuation of the service at either current or reduced levels, it may refuse the route elimination.

In this application, the Board must balance the public's need for a service with an operator's ability to maintain a financially viable service. These matters are discussed in detail on a route by route basis in the Route-Specific Analysis section of this decision. The Board notes that, in many communities, GCTU is not the only provider of scheduled bus services. Publicly funded services, such as BC Transit, Translink and Health Connections, as well as a number of commercial services, are available to people in many communities on the GCTU network.

The Board is aware that some individuals will be negatively impacted by the reductions proposed by GCTU. The Board is of the view that, on balance, it is in the broader public interest to maintain services on GCTU's scheduled routes, even with decreased options or scheduling inconveniences, than to have GCTU abandon its B.C. operation altogether in order to stem its severe operating losses.

Given the above, the Board finds that the service reductions proposed by GCTU will provide an adequate level of service to the public.

VI. Route-Specific Analysis

The Board makes note of two issues raised in the public comments.

A submission from a GCTU driver based in Edmonton, who is also a member of a local “Runs Committee,” acknowledges the continually declining ridership on routes D, G and N. The driver observes that for GCTU to remain in business and be profitable, the reduction in services in all of Western Canada is necessary and should be granted. That said, he notes the applicant’s claim that it will eliminate approximately 2.2 million miles and save approximately \$6.75 million works out to approximately \$3.07 per mile driven. The driver questions why the applicant’s total revenue-per-mile (RPM) breakeven cost of \$5.69, therefore, is not used to calculate savings which would be much higher. GCTU responded by explaining that its wheel (operating) cost per mile in B.C. (excluding overhead) is \$3.02 per mile. If 2.2 million miles are eliminated, GCTU states that its operating savings will be \$6.65 million (2.2 m x \$3.02).

Another Greyhound driver, who made detailed submissions on many of the proposed route changes, raised questions about the ridership numbers that GCTU provided for many of the schedules noted in the Explanatory Paper. The driver provided passenger count estimates for some cities or periods of time that were much higher than the average reported by Greyhound. The applicant responded by stating that “GCTU adds together all miles travelled by all passengers who rode the schedule in question on a particular day and divides this aggregate number by the total number of scheduled miles travelled by bus on that schedule”. The Board accepts that ridership for any segment of a schedule, as well as by time of week or year, can fluctuate significantly from the annual average for the route as a whole.

The issues raised in the submissions of both drivers do not cast doubt on the reliability of the numbers provided by Greyhound.

Route A: Alberta – Vancouver (via Highway 1)

GCTU proposes the following changes in minimum route frequency on the Salmon Arm – Vancouver segment of Route A (except that no change is proposed for Monte Creek):

- A reduction from 5 daily trips in each direction at Salmon Arm to 2.
- Various reductions in service from Sorrento to Vancouver (generally, a reduction of about 1 daily trip in each direction)

GCTU’s Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route. GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 16).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

City of Vancouver	City of Chilliwack	Village of Chase
City of Coquitlam	District of Hope	Sorrento
City or Township of Langley	City of Merritt	City of Salmon Arm
City of Abbotsford	City of Kamloops	

GCTU’s Explanatory Paper notes that the Health Connections Bus, operated by BC Transit for the Interior Health Authority, provides unregulated, subsidized inter-city bus services along some of the corridors it serves. With respect to this route, information on the BC Transit website identifies the following route points that are served by the Health Connections Bus:

- Golden
- Revelstoke – Sicamous – Salmon Arm – Sorrento – Chase – Kamloops – Savona – Cache Creek – Ashcroft – Spence’s Bridge – Lytton
- Salmon Arm – Enderby – Armstrong – Vernon – Kelowna
- Kamloops – Merritt

Figure 1 provides a statistical summary of the 24 public comments received for this route. This total includes 3 late comments that were considered. Two were from government and one was from an individual.

Figure 1: Public Comments Considered With Respect To Route A

Business: 1	Government: 6	Individual: 14	Other: 3
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The comments from local governments included submissions from the District of Barriere and the Thompson-Nicola Regional District (TNRD) which were almost identical, the City of Kamloops, the Fraser Valley Regional District (FVRD), the Columbia Shuswap Regional District (CSRD) and the Township of Langley. Several of these simply conveyed opposition to the new proposed level of service. The remainder took note of individuals who do not drive for a variety of reasons (e.g. seniors, low-income) and who rely on the GCTU service as their only form of transportation to and from their community and region.

A submission from Venture Kamloops, an economic and business development agency for the City of Kamloops, observes that the community and region will be negatively impacted by a reduction in minimum route frequency as the local economy and quality of life depend on the transportation of goods, services, and people.

Email comments from a GCTU driver based in Vancouver deals with multiple routes proposed for minimum route frequency reductions concerning GCTU's application as a whole. The submission on the minimum route frequency reduction for this route pointed out that the average passenger load on schedule 5014 (Vancouver to Salmon Arm) increases as it travels east, particularly at Chilliwack, and that if all the cuts applied for are granted, there will be no service to Vernon from the Lower Mainland and Fraser Valley. With regard to cuts for Schedule 5001 (Salmon Arm to Vancouver), the driver comments that passengers needing to get to Kamloops for medical appointments will need to find alternative transportation because the remaining service will not arrive until late in the day when medical offices are closed. The driver also observes that the average passenger load on Schedule 5001 increases as it approaches Vancouver.

Finally with respect to route A2(b) and schedule 5012 (Vancouver to Kamloops) the driver notes the average passenger load from Vancouver picks up passengers heading to Falkland and Vernon who transfer in Kamloops, and other passengers heading to West Kelowna, Kelowna, Summerland or Penticton for transfers in Merritt. The driver indicates that the cuts will mean longer travelling and layover times to reach their destinations. Thirteen submissions came from individuals. Of these, concerns were expressed by 7 residents from the Salmon Arm, Chase and Sorrento area about the proposed elimination of Schedule 5001 leaving Salmon Arm at 7:30 a.m. headed toward Vancouver. Other people who made submissions, but who live in other areas, noted that they use this schedule as well as 5014 (Vancouver to Salmon Arm).

Schedule 5001 allows same day service to Vancouver. Only 3 submissions specified frequent use (i.e. between 6 and 3 times a year) on this schedule. Few submissions referred to the direct use of schedule 5012. Other submissions referred to general impacts and limited options for travel purposes such as family visits and accessing medical appointments in Vancouver or Calgary.

GCTU proposes to reduce services by eliminating schedules with FY12 passenger loads which average about 25 passengers per scheduled run. The Board also notes that revenue-per-mile information shows that for the 3 schedules targeted for elimination, ridership is insufficient for GCTU to operate above the breakeven point. The Board finds that the minimum route frequency proposed by GCTU will ensure that the public continues to have inter-city bus service on this route and allow GCTU to improve its financial situation.

Route B2: Kelowna - Penticton

The minimum route frequency of Route B2 is 4 daily trips in each direction. GCTU proposes to reduce minimum route frequency on Route B2 by half.

GCTU's Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route. GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 17).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

City of Kelowna

District of Summerland

City of Penticton

Westbank

GCTU's Explanatory Paper notes that the Health Connections Bus, operated by BC Transit for the Interior Health Authority, provides unregulated, inter-city bus services along some of the corridors it serves. With respect to this route, information on the BC Transit website identifies Kelowna, Summerland and Penticton as route points that are served by the Health Connections Bus.

Figure 2 provides a statistical summary of the 6 public comments received for this route. This total includes 2 late comments that were considered; both late submissions were from local government representatives.

Figure 2: Public Comments Considered With Respect To Route B2

Business: 0	Government: 4	Individual: 1	Other: 1
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A submission on this route was received from the Vancouver-based GCTU driver introduced in the discussion on Route A. The driver outlines concerns regarding the impact of these minimum route frequency reductions on people trying to access medical care appointments in Kelowna or Vancouver.

The Board also received a generic submission from a Kelowna resident expressing the broad need for adequate route coverage in B.C. so as to not impact and isolate the poor and aged.

Submissions from local government representatives were received from: the City of Penticton, the Association of Kootenay and Boundary Local Governments (AKBLG), the Regional District of Central Okanagan (RDCO) and the Regional District Okanagan-Similkameen (RDOS). Government submissions reported on the reliance and dependency on the bus service by those people who do not or cannot drive, students, and the elderly to access medical appointments, post secondary education and relatives. The RDCO refers to a needed review of the GCTU monopoly on bus transportation with a focus on local solutions. We note that anyone may apply to operate an ICB on any route in British Columbia.

The Board notes that 2 northbound schedules (5028 and 5039) and 2 southbound schedules (5017 and 5024) remain as transportation options. These schedules allow connections to other GCTU route services through to Vancouver. Further, medical appointments can be arranged through the Health Connections Bus operated by BC Transit between Penticton, Summerland and Kelowna. The Board finds that all of the 4 routes outlined above for elimination operate with small passenger loads. The RPM for each route is significantly below the applicant's breakeven costs per mile of \$5.69. It is also

below GCTU’s “wheel” (operating) cost of \$3.02 per mile. This ridership and financial information, together with a very limited number of submissions, suggest low ridership and that the reductions of routes should have little impact.

GCTU proposes to reduce services by eliminating schedules with FY12 passenger loads which average between 8 and 13 passengers per scheduled run. The Board also notes that revenue-per-mile information shows that for the 4 schedules targeted for elimination, ridership is insufficient for GCTU to operate above the breakeven point. The Board finds that the minimum route frequency proposed by GCTU will ensure that the public continues to have inter-city bus service on this route and allow GCTU to improve its financial situation.

Route C: Vancouver – Rock Creek

GCTU must now operate at least:

- 1 daily trip in each direction between Vancouver and Penticton (plus an additional 7 eastbound trips per week from Vancouver to Penticton)
- 2 daily trips in each direction between Penticton and Osoyoos, and
- 1 daily trip in each direction between Osoyoos and Rock Creek

GCTU proposes to reduce the minimum route frequency on Route C as described below:

- 1 daily trip in each direction between Vancouver and Penticton (and no additional eastbound service)
- 1 daily trips in each direction between Penticton and Osoyoos (with no service to Kaleden Junction), and
- No service beyond Osoyoos (eliminating Bridesville and Rock Creek)

GCTU’s Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route.

GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 18).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

City of Vancouver	Allison Pass	City of Penticton
City of Coquitlam	Manning park	Kaledan Junction
District of Maple Ridge	Eastgate	Okanagan Falls
District of Mission	Town of Princeton	Town of Oliver
City of Abbotsford	Hedley	Town of Osoyoos
City of Chilliwack	Village of Keremeos	Bridesville
District of Hope	Kaledan Junction	Rock Creek

If approved, the proposed changes would result in the elimination of service to Bridesville and Rock Creek. GCTU indicated that ridership on schedules 5021 and 5024 between Penticton and Rock Creek is low. As well, Rock Creek continues to be served on route D (1 trip per day in each direction) between Kelowna and Calgary. GCTU provided the following information regarding Bridesville:

In the 12 month period July 1, 2011 – June 30, 2012, a total of 74 passengers (.2/day) originated in Bridesville and a total of 181 passengers (.5/day) were destined to Bridesville. The distance from Bridesville to Osoyoos is 22 miles and from Bridesville to Rock Creek is 9 miles.

GCTU's Explanatory Paper notes that the Health Connections Bus, operated by BC Transit for the Interior Health Authority, provides unregulated, inter-city bus services along some of the corridors it serves. With respect to this route, information on the BC Transit website identifies the following route points that are served by the Health Connections Bus:

- Princeton – Keremeos – Oliver – Osoyoos
- Kelowna – Summerland – Penticton

Figure 3 provides a statistical summary of the 11 public comments received for this route. This total includes 1 late comment (from government) that was considered.

Figure 3: Public Comments Considered With Respect To Route C

Business: 0	Government: 9	Individual: 0	Other: 2
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The Vancouver-based GCTU driver who commented on routes A and B2 also made a submission on the minimum route frequency reduction for this route. The driver outlines that in 4 years of driving he has never picked up or dropped off passengers at Bridesville, and only twice dropped off passengers in Kaledan. He states that cutting schedule 5008 would mean there is no Greyhound option for passengers boarding in Princeton, Hedley or Keremeos to reach Kootenay destinations without a hotel stay.

A submission from another GCTU driver who sits on a Vancouver route advisory committee, (the Vancouver Runs Committee) also notes the few passengers to and from Bridesville, but notes the schedules going to and from Rock Creek have as their primary purpose to serve direct connecting schedules coming into Rock Creek. With the elimination of the Penticton to Rock Creek portion of schedule 5024 there will be no direct connections south of Penticton (and require a layover). Further, with the proposed elimination of the Rock Creek to Penticton portion of schedule 5021, passengers from the Kootenays will no longer have any way to get to Osoyoos, Oliver or Okanagan Falls other than travelling directly to Kelowna from Rock Creek (on schedule 5161 Calgary to Kelowna) and waiting for travel south to Penticton and beyond. With respect to the elimination of schedule 5008 (Vancouver to Rock Creek), passengers seeking to travel east to the Kootenays will lose this

option via Rock Creek and will require travel to Kelowna and layovers to make necessary connections to the Kootenays.

Submissions from local government representatives, several of which are noted above with routes A and B2, were received from: the Regional District Okanagan-Similkameen (RDOS), the Fraser Valley Regional District (FVRD), the Association of Kootenay and Boundary Local Government (AKBLG), and also the Township of Langley, the Village of Keremeos, the Towns of Osoyoos, Oliver and Princeton and the City of Penticton. The major theme from all of these submissions was the dependence on bus service (particularly same day service) by rural residents especially the elderly, but also individuals with fixed or low incomes, to access resources and medical services in larger centers.

With respect to the elimination of schedule 5008 (Vancouver to Rock Creek), GCTU explained that it will maintain daily service on this route with its existing schedule 5022 (Vancouver to Osoyoos). As well, schedule 5003 continues to serve on this route each day from Osoyoos to Vancouver.

GCTU commented on the submission of the second GCTU driver, as noted above, regarding the proposed reduction of minimum frequency south of Penticton. GCTU noted that BC Transit operates subsidized daily scheduled transit services in each direction between Osoyoos, Okanagan Falls, Penticton and Summerland, and that this service extends to Kelowna each Monday.

The Board received a low number of submissions on this route, most of which are from local government, with no submissions from any concerned or impacted rider. The Board finds that this is consistent with the low passenger traffic counts for the schedules impacted. Also, all of the schedules operate well below the breakeven RPM for GCTU. The public has access to daily BC Transit services noted above, together with a Health Connections Bus service operated on the Princeton – Keremeos – Oliver – Osoyoos corridor, as well as Penticton- Summerland- Kelowna. Thus, residents have options to access a variety of services in larger communities.

The removal of service to Bridesville is justified given the low passenger counts originating or terminating there. The elimination of this route point should have a minor impact on public need. Residents in Bridesville undertaking long trips east or west may connect with the Greyhound network in Rock Creek (on Route D) or Osoyoos (on Route C).

GCTU proposes to reduce services by eliminating schedules with FY12 passenger loads which average less than 12 passengers per scheduled run – taking into account that data for two schedules covers ridership beyond Route C. The Board also notes that revenue-per-mile information shows that for the 4 schedules targeted for elimination, ridership is insufficient for GCTU to operate above the breakeven point. The Board finds that the minimum route frequency and route changes proposed by GCTU will ensure that the public continues to have inter-city bus service on this route and allow GCTU to improve its financial situation.

In eliminating Bridesville and Rock Creek as route points, the Board is changing the eastern terminating point from Rock Creek to Osoyoos. As well, it is eliminating a now-inapplicable Route C service limitation respecting Route Connection Layover Time in Rock Creek.

Route D: Kelowna – Alberta (via Highway 3)

GCTU operates 1 daily schedule in each direction between Kelowna and Alberta (via Highway 3 through the Kootenays). It also operates an additional 3 weekly trips in each direction (i.e. a total of 10 trips weekly in each direction). GCTU does not propose a change to the daily service. Rather, it proposes to reduce the minimum weekly route frequency in each direction from 10 trips to 7.

GCTU’s Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route. GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 19).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

City of Kelowna	Village of Salmo	Elko
Beaverdell	Junction 3 & 6	City of Fernie
Rock Creek	Summit	Hosmer
Village of Midway	Town of Creston	District of Sparwood
City of Grand Forks	Kitchener Junction	Natal
Christina Lake	Yahk	Michel
City of Castlegar	Moyle	Crowsnest Junction
City of Trail	City of Cranbrook	(Alberta Border & Highway 1)
City of Nelson	Jaffray	

We note that GCTU has an interline arrangement with Silver City Stagelines for additional services between Trail and Castlegar. These services are not affected by this application. GCTU’s Explanatory Paper notes that the Health Connections Bus, operated by BC Transit for the Interior Health Authority, provides unregulated, inter-city bus services along some of the corridors it serves. With respect to this route, information on the BC Transit website identifies the following route points that are served by the Health Connections Bus:

- Castlegar – Trail – Nelson - Salmo
- Creston – Cranbrook – Fernie – Sparwood

Figure 4 provides a statistical summary of the 17 public comments received for this route. This total includes 3 late comments that were considered (received from government).

Figure 4: Public Comments Considered With Respect To Route D

Business: 0	Government: 10	Individual: 4	Other: 3
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The Board received only 4 submissions from actual riders concerning the reductions in service on Route D. Only 1 of these submissions provided any specificity regarding usage.

Submissions on this route from local governments were received from: the Association of Kootenay and Boundary Local Governments (AKBLG) and the Regional District of Central Okanagan (RDCO), the Regional District of Central Kootenay (RDCK) as well as the Cities of Cranbrook, Grand Forks, Castlegar, Trail and Greenwood, the Town of Creston and the Village of Midway. The submissions spoke about the reliance on the GCTU service by many people who cannot access or cannot afford other modes of travel and need the service to get to medical or health related appointments in such destinations as Vancouver, Calgary, Kelowna, Trail, or Nelson. The City of Greenwood reports concerns that the proposed reduction will increase the associated risks with increased hitchhiking by young adults. The City of Trail noted the general dependence of the service in winter months when local airports are often affected by weather.

The City of Trail and the Town of Creston, in particular, note the importance of the evening bus service that it uses for its required drinking water sample analysis in Kelowna. The water samples must arrive within a 24-hour period and without a night service, samples leaving the next day in the morning would have difficulty or would not meet this requirement. Several other submissions raised issues related to freight. The jurisdiction of the Board relates to passenger transportation and not freight, and for this reason, the Board has not examined how the proposed reduction in passenger service would affect freight. We note, however, that GCTU stated that approval of its proposed reductions in passenger service levels would not cause the discontinuation of overnight package express for those same communities.

Four submissions were received from individuals. All expressed the need for the GCTU service as air travel out of Castlegar in the winter time is highly unreliable. In general they also expressed the use of the service to visit family and friends east and west from the Kootenays. A resident from Nelson notes the reliance and importance of night service out of Nelson and the night service back from Vancouver to avoid layovers and make connections in the Lower Mainland and on Vancouver Island for work, travel, etc. The submission also raised the hazardous conditions of driving in winter in the Kootenays.

Submissions from local government representatives report the need to access medical services at longer distance locations such as Vancouver and Calgary, as well as closer destinations in Trail, Nelson and Kelowna. With service options available through BC Transit, HandyDart and Health Connections, the public need is reasonably met for access to medical services at regional hospitals at Trail, Nelson and Cranbrook. These are available

Monday to Friday between Trail and Nelson and on Tuesdays and Thursdays between Cranbrook and Creston. For medical appointments and other travel to Kelowna, Vancouver or Calgary the remaining GCTU daily schedules (5010 and 5161) provide options.

With respect to this route the applicant’s data shows fiscal year 2012 (FY12) RPMs on each of these schedules are less than half of GCTU’s breakeven RPM. The portions of the schedules proposed for elimination, if GCTU is required to keep operating them, could have a deleterious impact on the long term viability of the remaining schedules. The reduced service minimum should improve the profitability of Route D.

GCTU proposes to reduce services by eliminating schedules with FY12 passenger loads which appear to average about 12 passengers per scheduled run. The Board also notes that revenue-per-mile information shows that for the 2 weekend schedules targeted for elimination, ridership is insufficient for GCTU to operate above the breakeven point. The Board finds that the minimum route frequency proposed by GCTU will ensure that the public continues to have inter-city bus service on this route and allow GCTU to improve its financial situation.

Route E: Prince George - Vancouver

GCTU proposes to reduce minimum route frequency for various route points on Route E1 between **Prince George and Cache Creek** (generally from 3 trips daily in each direction to 2), and Route E2(b) between **Chilliwack and Vancouver** (generally from up to 2 trips daily in each direction to 1). Proposed minimums vary for some route points, including Spuzzum for which flag service is to be upgraded from flag service to a scheduled stop.

GCTU’s Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route. GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 20).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

City of Prince George	District of 100 Mile House	City of Chilliwack
City of Prince George Airport	70 Mile House	City of Abbotsford
Hixon	Village of Clinton	City or Township of Langley
City of Quesnel	Village of Cache Creek	City of Coquitlam
City of Williams Lake	Spuzzum	City of Vancouver

Figure 5 provides a statistical summary of the 20 public comments received for this route. This total includes 3 late comments from government that were considered.

Figure 5: Public Comments Considered With Respect To Route E

Business: 0	Government: 11	Individual: 7	Other: 2
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GCTU's Explanatory Paper notes that the Northern Health Authority subsidizes a bus operated by Diversified Transport under a charter arrangement and a General Authorization Passenger Transportation Licence to provide intercity bus service along this and other GCTU routes. Information from the Northern Health Authority website identifies the following points along GCTU Route E that are served by the Northern Health Connections bus:

- Prince George - Quesnel - William's Lake - Cache Creek - Kamloops - Chilliwack - Vancouver

Submissions from local government representatives were received from: the District of Barriere and the Thompson-Nicola Regional District (which made identical submissions), the Corporation of the Village of Clinton, the City of Quesnel, the City of Williams Lake, the Village of Cache Creek, the Township of Langley, the Fraser Valley Regional District, the Regional District of Fraser-Fort George, the City of Prince George, and the North Central Local Government Association.

Several submissions expressed opposition to the proposed reduction in service. A number of submissions made reference to the reliance on the GCTU service to support individuals who do not drive for a variety of reasons and need the Greyhound bus for transportation to and from their community and region. The City of Prince George and the City of Quesnel report concerns that the proposed reduction will heighten risks associated with increased hitchhiking. The Village of Cache Creek requested that the 02:30 trip (i.e. schedule 5016 from Vancouver to Prince George) be the one cut from the GCTU schedule. Several of the submissions made reference to the Northern Health Connections information supplied by the applicant. This matter is addressed in section III B of this decision.

The North Central Local Government Association (NCLGA) suggested, for the Board's consideration, running schedules 5015 and 5040 at a minimum of twice per week rather than eliminating them entirely. The NCLGA also raised concerns about the impact on freight services. The jurisdiction of the Board relates to passenger transportation and not freight, and for this reason, the Board has not examined how the proposed reduction in passenger service would affect freight. We note, however, that GCTU stated that approval of the proposed route reductions made with this application would not cause the discontinuation of overnight package express service in those communities. Seven submissions came from individuals. One agreed that a service reduction is needed and proposed several schedule changes for the Board to consider. Five submissions referred to the general impact of the proposed changes, the limited options for travel as well as the growth in lineups to board the bus in Chilliwack and Langley if the route frequency is reduced.

One submission from the Omineca Beetle Action Coalition (OBAC) opposed route changes in Northern BC as proposed by GCTU because "consistent transportation options are essential to the regions continued development and a reduction in service will have a negative impact on the communities and First Nations that we represent."

If the proposed reductions are approved, GCTU would continue operating 2 daily schedules southbound (5033 and 5035) and 2 daily schedules northbound (5016 and 5042). In addition to GCTU's remaining service, the Northern Health Connections Bus is available.

GCTU proposes to reduce services by eliminating schedules with FY12 passenger loads which average 21 passengers per scheduled run (Prince George to Vancouver) and 11 passengers (Kamloops to Prince George). The Board also notes that revenue-per-mile information shows that for the 2 schedules targeted for elimination, ridership is insufficient for GCTU to operate above the breakeven point. The Board finds that the minimum route frequency proposed by GCTU will ensure that the public continues to have inter-city bus service on this route and allow GCTU to improve its financial situation.

Route G: Alberta (via Highway 2) – Dawson Creek

GCTU proposes to reduce minimum route frequency on Route G (between Dawson Creek and the Alberta border) from 2 trips daily in each direction to 1.

GCTU's Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route. GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 21).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

Tom's Lake

Village of Pouce Coupe

City of Dawson Creek

GCTU's Explanatory Paper notes that the Northern Health Authority subsidizes a bus operated by Diversified Transport under a charter arrangement and a General Authorization Passenger Transportation Licence to provide intercity bus service along this and other GCTU routes. Information from the Northern Health Authority website identifies the following points along GCTU Route G that are served by the Northern Health Connections bus:

- Dawson Creek - Grande Prairie (Alberta)

Figure 6 provides a statistical summary of the 9 public comments received for this route.

Figure 6: Public Comments Considered With Respect To Route G

Business: 0	Government: 3	Individual: 3	Other: 3
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The Board received three submissions from local government representatives: the City of Dawson Creek, the City of Fort St. John, and the North Central Local Government Association (NCLGA). All of these submissions expressed opposition to the proposed reduction in service.

The NCLGA raised concerns about the impact on freight services. As well, the Northern Health Laboratories expressed concern regarding the shipment of patient blood samples and how a reduction of services would impact patient care. The jurisdiction of the Board relates to passenger transportation and not freight, and for this reason, the Board has not examined how the proposed reduction in passenger service would affect freight. We note, however, that GCTU stated that approval of the proposed route reductions made with this application would not cause the discontinuation of overnight package express service in those communities.

One of the submissions referred to the Northern Health Connections information supplied by the applicant. This matter is addressed in section III B of this decision. There was also a concern that route reductions would impact the ability of workers to commute between Dawson Creek and Ft. St. John (during the hours of 16:20 - 17:30 and 16:30 - 19:40).

Three submissions came from individuals who referred to the general impact and the limited options for travel if the route frequency is changed.

One submission was received from a GTCU driver based in Edmonton who is a member of the local "Runs Committee." This individual supports the proposed route reductions due to continually declining GTCU ridership and urged the Board to approve GTCU's request for reduction of services.

By approving the changes requested, GCTU will continue operating 1 schedule southbound (5066) and 1 schedule northbound (5227). In addition to GCTU's remaining service, the Northern Health Connections bus is available for medical transportation.

GCTU proposes to reduce services by eliminating 2 schedules with FY12 passenger loads which average 11 and 19 passengers per scheduled run. The Board also notes that revenue-per-mile information shows that for the 2 schedules targeted for elimination, ridership is insufficient for GCTU to operate above the breakeven point. The Board finds that the minimum route frequency proposed by GCTU will ensure that the public continues to have inter-city bus service on this route and allow GCTU to improve its financial situation.

Route I1: Dawson Creek – Fort Nelson

GCTU proposes to reduce minimum route frequency on the **Dawson Creek – Fort St. John** portion of Route I1 – from a total of 30 trips weekly to 14. GCTU does not propose to stop the 1 daily trip in each direction that is now required on this route.

GCTU's Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route. GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 22).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

City of Dawson Creek

District of Taylor

City of Fort St. John

GCTU's Explanatory Paper notes that the Northern Health Authority subsidizes a bus operated by Diversified Transport under a charter arrangement and a General Authorization Passenger Transportation Licence to provide intercity bus service along this and other GCTU routes. Information from the Northern Health Authority website identifies the following communities along GCTU Route I1 that are served by the Northern Health Connections bus:

- Dawson Creek - Taylor - Fort St. John

Figure 7 provides a statistical summary of the 15 public comments received for this route. This total includes 1 late comment from government that was considered.

Figure 7: Public Comments Considered With Respect To Route I1

Business: 2	Government: 4	Individual: 6	Other: 3
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Submissions from local government representatives were received from: the City of Fort St. John, the City of Dawson Creek, the District of Taylor, and the North Central Local Government Association.

The North Central Local Government Association raised concerns about the impact on freight services. One submission was received from Northern Health Laboratories regarding the shipment of patient blood samples and the concern about the reduction of services would impact patient care. As well, an aviation maintenance company relies on GCTU's freight services. The jurisdiction of the Board relates to passenger transportation and not freight, and for this reason, the Board has not examined how the proposed reduction in passenger service would affect freight. We note, however, that GCTU stated that approval of the proposed route reductions made with this application would not cause the discontinuation of overnight package express service in those communities.

One submission made reference to the reliance on the GCTU service to support individuals who do not drive for a variety of reasons and need this as a form of transportation to and from their community and region. There was also reference made to the environmental impact of more cars being put on the road and increased traffic congestion.

Six submissions came from individuals. Five submissions referred to the general impact and the limited options for travel, especially for those without access to a vehicle. One submission expressed opposition to the reduction of bus services to Fort Nelson, although no change in service level is proposed for Fort Nelson. This submitter is also finding it hard to understand why Northern Health is operating a bus service in the north when an integrated service with Greyhound could ensure more viability for the public to travel by

bus. In addition, a construction company uses GCTU's services to move crews to and from work sites and home.

If requested reductions are approved, GCTU states that it will continue operating 2 schedules southbound (5051 Sunday and Monday and 5095 daily except Sunday) and 2 schedules northbound (5096 daily except Monday and 5070 Sunday and Monday). This totals 16 trips per week. In addition to GCTU's remaining service, the Northern Health Connections Bus is available.

GCTU proposes to reduce services by eliminating schedules with FY12 passenger loads which average 10 passengers per scheduled run. The Board also notes that revenue-per-mile information shows that for the 2 schedules targeted for elimination, ridership is insufficient for GCTU to operate above the breakeven point. The Board finds that the minimum route frequency proposed by GCTU will ensure that the public continues to have inter-city bus service on this route and allow GCTU to improve its financial situation.

Route J: Dawson Creek – Prince George

GCTU proposes to reduce minimum route frequency on Route J with the exception that no change in service level is proposed for Mackenzie. The applicant proposes to reduce minimum frequency from a total of 24 trips per week to 14. For Bear Lake, the reduction would be from 19 to 14.

GCTU's Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route. GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 23). In addition, GCTU provided information about schedules on this route that will be retained. A summary is provided in Appendix 1 (Figure 24).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

City of Dawson Creek
Arras
Groundbirch
District of Chetwynd
Commotion Creek

Pine Valley
Azouetta Lake
Kennedy
Mackenzie Junction (X2)
Windy Point

McLeod Lake Lodge
Bear Lake
Salmon River
City of Prince George

GCTU's Explanatory Paper notes that the Northern Health Authority subsidizes a bus operated by Diversified Transport under a charter arrangement and a General Authorization Passenger Transportation Licence to provide intercity bus service along this and other GCTU routes. Information from the Northern Health Authority website identifies the following points along GCTU Route J that are served by the Northern Health Connections bus:

- Dawson Creek - Chetwynd - Mackenzie Junction - Prince George

Figure 8 provides a statistical summary of the 16 public comments received for this route. This total includes 1 late comment from government that was considered.

Figure 8: Public Comments Considered With Respect To Route J

Business: 2	Government: 6	Individual: 4	Other: 4
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Submissions from local government representatives were received from: the City of Prince George, the North Central Local Government Association, the City of Fort St. John, the City of Dawson Creek, the District of Mackenzie, and the District of Chetwynd. Several of the submissions expressed opposition to the proposed service reductions. Specific reference was made to the schedule change from daytime to night-time buses. A number of submissions make reference to the reliance on the GCTU service to support individuals who do not drive for a variety of reasons and need this as a form of transportation to and from their community and region. The City of Prince George and the District of Mackenzie report concerns that the proposed reduction will increase the associated risks with increased hitchhiking. Several submissions made reference to the Northern Health Connections information supplied by the applicant. This matter is addressed in section III B of this decision.

One submission was received from Northern Health Laboratories regarding the shipment of patient blood samples and concern that a reduction in passenger services would impact patient care. The North Central Local Government Association and two individuals also raised concerns about the impact on freight services. The jurisdiction of the Board relates to passenger transportation and not freight, and for this reason, the Board has not examined how the proposed reduction in passenger service would affect freight. We note, however, that GCTU stated that approval of the proposed route reductions made with this application would not cause the discontinuation of overnight package express service in those communities.

Four submissions from individuals refer to the general impact and limited options for travel if the route frequency is changed. One of the submissions agreed that a service reduction is needed but the arrival and departure times require further adjusting. One submission came from the Omineca Beetle Action Coalition (OBAC) which has expressed opposition to route changes in Northern BC as proposed by GCTU. It stated that "consistent transportation options are essential to the regions continued development and

a reduction in service will have a negative impact on the communities and First Nations that we represent.”

If the changes requested are approved, GCTU states that it will remain operating one daily schedule westbound (5045) and one daily schedule eastbound (5062). In addition to GCTU’s remaining service, the Northern Health Connections Bus is available for medical transportation.

GCTU proposes to reduce services by eliminating schedules with FY12 passenger loads which average about 12 passengers per scheduled run. The Board also notes that revenue-per-mile information shows that for the 2 schedules targeted for elimination, ridership is insufficient for GCTU to operate above the breakeven point. The Board finds that the minimum route frequency proposed by GCTU will ensure that the public continues to have inter-city bus service on this route and allow GCTU to improve its financial situation.

Route K: Prince George – Ft. St. James

GCTU proposes to reduce minimum route frequency on Route K between Fort St. James and Prince George from 6 weekly trips in each direction to 1.

GCTU’s Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route. (Greyhound proposes to operate one schedule from Fort St. John on Friday and one schedule to Fort St. James on Sunday.) GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 25).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

City of Prince George	Finmore	Dog Creek
Mud River	Mapes Road	District of Ft. St. James
Telechik Road	District of Vanderhoof	
Bednesti Resort	12 Mile	

GCTU’s Explanatory Paper notes that the Northern Health Authority subsidizes a bus operated by Diversified Transport under a charter arrangement and a General Authorization Passenger Transportation Licence to provide intercity bus service along this and other GCTU routes. Information from the Northern Health Authority website identifies the following points along GCTU Route K that are served by the Northern Health Connections bus:

- City of Prince George - District of Vanderhoof - Fort St. James

The Board notes that Fort St. James is about 62 km from Vanderhoof where more travel connections can be accessed on the GCTU network.

Figure 9 provides a statistical summary of the 12 public comments received for this route.

Figure 9: Public Comments Considered With Respect To Route K

Business: 1	Government: 5	Individual: 3	Other: 3
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The Board received five submissions from local government: the District of Fort St. James, the District of Vanderhoof, the City of Prince George, the Regional District of Fraser-Fort George, and the North Central Local Government Association. Several of the submissions expressed opposition the proposed service reductions. A number of submissions refer to the reliance on the GCTU service to support individuals who do not drive for a variety of reasons and need this as a form of transportation to and from their community and region.

Several submissions made reference to the Northern Health Connections information supplied by the applicant. This matter is addressed in section III B of this decision.

The North Central Local Government Association and one business submission addressed concerns about the impact on freight services. The jurisdiction of the Board relates to passenger transportation and not freight, and for this reason, the Board has not examined how the proposed reduction in passenger service would affect freight. We note, however, that GCTU stated that approval of the proposed route reductions made with this application would not cause the discontinuation of overnight package express service in those communities.

Fort St. James District mentioned alternatives which include reducing the size of the coach providing transportation, coordinating routes, and the creation of a pre-booking system.

The City of Prince George, District of Fort St. James and Carrier Sekani Family Services report concerns that the proposed reduction will increase the associated risks with increased hitchhiking.

Two submissions came from individuals who refer to the general impact of more limited options for travel if the route frequency is reduced.

One submission was received from the Fort St. James National Historic Site of Canada expressing concerns about the negative and adverse impact on tourism in the area.

If the changes requested are approved, GCTU states that it will continue operating one daily schedule southbound (5050) and one daily schedule northbound (5037). In addition to GCTU's remaining service, the Northern Health Connections Bus is available.

GCTU proposes to reduce services by eliminating 5 schedules with FY12 passenger loads which average between 2 and 9 passengers per scheduled run. The Board also notes that revenue-per-mile information shows that for the 5 schedules targeted for elimination, ridership is insufficient for GCTU to operate above the breakeven point. The Board finds

that the minimum route frequency proposed by GCTU will ensure that the public continues to have inter-city bus service on this route and allow GCTU to improve its financial situation.

Route L1: Prince Rupert – Prince George

GCTU proposes to reduce minimum route frequency on Route L1 between Prince Rupert and Prince George from 22 total weekly trips to 14. GCTU does not propose a change to the minimum route frequency of 1 daily trip in each direction.

GCTU’s Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route. GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 26).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

City of Prince Rupert	Skeena Cross	Broman Lake
Port Edward Corner	District of New Hazelton	Village of Burns Lake
Tyee	Moricetown	Fraser Lake
Kwintsa	Town of Smithers	Fort Fraser
Shames	Village of Telkwa	District of Vanderhoof
City of Terrace	District of Houston	City of Prince George
Kitwanga Junction	Topley	

GCTU’s Explanatory Paper notes that the Northern Health Authority subsidizes a bus operated by Diversified Transport under a charter arrangement and a General Authorization Passenger Transportation Licence to provide intercity bus service along this and other GCTU routes. Information from the Northern Health Authority website identifies the following points along GCTU Route L1 that are served by the Northern Health Connections bus:

- Prince Rupert - Terrace – Gitsegukia –New Hazelton – Moricetown – Smithers –Telkwa – Houston –Burns Lake – Fraser Lake – Vanderhoof – Prince George
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Figure 10 provides a statistical summary of the 23 public comments received for this route.

Figure 10: Public Comments Considered With Respect To Route L1

Business: 1	Government: 16	Individual: 3	Other: 3
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The Board received sixteen submissions from local government representatives: the City of Prince George, the Village of Fraser Lake (identical to the Prince George letter), the North Central Local Government Association (NCLGA), the Regional District of Fraser-Fort George, the District of Mackenzie, the District of Vanderhoof, the District of Fort St. James,

the City of Prince Rupert, the Regional District of Kitimat-Stikine, the Skeena-Queen Charlotte Regional District, the Corporation of the Village of McBride, the Town of Smithers, Robin Austin (MLA for Skeena), the District of Houston, the Corporation of the Village of Telkwa and the District of Kitimat.

Many submissions expressed opposition to the proposed service reduction. A number of submissions referred to the reliance on the GCTU service to support individuals who do not drive for a variety of reasons and need this as a form of transportation to and from their community and region.

Several submissions made reference to the Northern Health Connections information supplied by the applicant. This matter is addressed in section III B of this decision.

The North Central Local Government Association and one business submission addressed concerns about the impact on freight services. The jurisdiction of the Board relates to passenger transportation and not freight, and for this reason, the Board has not examined how the proposed reduction in passenger service would affect freight. We note, however, that GCTU stated that approval of the proposed route reductions made with this application would not cause the discontinuation of overnight package express service in those communities.

Fort St. James District mentioned alternatives which include reducing the size of the coach providing transportation, coordinating routes, and the creation of a pre-booking system. Three submissions came from individuals who refer to the general impact of more limited options for travel if the route frequency is reduced. One of the submissions agreed that a service reduction is needed but the arrival and departure times require further adjusting. Submissions from several local government sources, including Carrier Sekani Family Services, report concerns that the proposed reduction will increase the associated risks with increased hitchhiking.

One submission came from the Omineca Beetle Action Coalition (OBAC) which expressed opposition to route frequency changes in Northern BC as proposed by GCTU. It stated that “consistent transportation options are essential to the regions continued development and a reduction in service will have a negative impact on the communities and First Nations that we represent.”

If the changes requested are approved, GCTU has stated that it will continue operating one daily schedule eastbound (5050) and one daily schedule westbound (5037). In addition to GCTU’s remaining service, the Northern Health Connections Bus is available.

GCTU proposes to reduce services by eliminating 2 schedules with FY12 passenger loads which average 11 passengers per scheduled run. The Board also notes that revenue-per-mile information shows that for the 2 schedules targeted for elimination, ridership is insufficient for GCTU to operate above the breakeven point. The Board finds that the

minimum route frequency proposed by GCTU will ensure that the public continues to have inter-city bus service on this route and allow GCTU to improve its financial situation.

Route N: Alberta (via Highway 16) - Vancouver

GCTU proposes to reduce minimum route frequency on the portion of Route N between Alberta (connecting with Edmonton) and Barriere (near Kamloops). The applicant proposes to reduce minimum frequency on this route from 2 trips daily in each direction to 1 (with Mt. Robson proposed for a reduction of 21 total flag trips weekly to 14).

GCTU's Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route. GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 27). In addition, GCTU provided information about schedules on this route that will be retained. A summary is provided in Appendix 1 (Figure 28).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

Mt. Robson	Avola Junction	Barriere
Village of Valemount	Clearwater	City of Kamloops ¹
Blue River	Little Fort	

GCTU's Explanatory Paper notes that the Northern Health Authority subsidizes a bus operated by Diversified Transport under a charter arrangement and a General Authorization Passenger Transportation Licence to provide intercity bus service along this and other GCTU routes. Information from the Northern Health Authority website identifies the following points along GCTU Route N that are served by the Northern Health Connections bus:

- Valemount – Kamloops

Figure 11 provides a statistical summary of the 24 public comments received for this route. This total includes 4 late comments (1 business, 2 government, 1 individual) that were considered.

Figure 11: Public Comments Considered With Respect To Route N

Business: 1	Government: 6	Individual: 12	Other: 5
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The Northern Health Corporate Office wrote to offer clarifications on statements made by GCTU in its Explanatory Paper concerning its services and booking requirements for riders. These apply with respect to its short and long distance services covering various

¹ GCTU does not propose a change to its licensed minimum route frequency for Kamloops.

components of Route N including services with stops between Valemount and Prince George; Valemount and Kamloops; Prince George and Vancouver.

A submission was received from the Omnica Beetle Action Committee that is opposed to GCTU reductions of service impacting the Regional District of Fraser-Fort George (RDFFG) and the Regional District of Bulkley Nechako. The submission notes that consistent transportation options are essential to the regions continued development and reductions will have a negative impact on the communities and First Nations it represents.

Submissions were received from local and regional governments concerning Route N including the RDFFG; the District of Barriere; the Thompson-Nicola Regional District, the Corporation of the Village of McBride (McBride); the Village of Valemount and the Township of Langley. Many of these refer to the need of GCTU scheduled service by rural residents to access medical, educational and other service needs in larger urban centers as well as sustain local economies.

Several also raised issues related to freight. The jurisdiction of the Board relates to passenger transportation and not freight, and for this reason, the Board has not examined how the proposed reduction in passenger service would affect freight. We note, however, that GCTU stated that approval of its proposed reductions in passenger service levels would not cause the discontinuation of overnight package express for those same communities.

McBride reports its safety concern, particularly with respect to the history of Highway 16, and advocates that service not be diminished and that provincial authorities find better solutions such as direct subsidies. The Village of Valemount notes that the proposed reductions will leave the only pick up times after midnight (which presents a hardship, especially in winter) and impacts accessibility and carbon emissions. The reductions will also likely increase hitch-hiking in remote areas causing risk to vulnerable people.

With regard to Valemount, 1 submission came from an individual who observes the importance of the service to the elderly or those who do not drive on winter roads and need the bus for out of town medical appointments. The individual also notes the inconvenience and hardship of the remaining schedules on the route that will require late night bus service.

The Board received 9 individual submissions from Blue River. Eight (8) comprised similar letters from employees of Mike Wiegele Helicopter Skiing (MWHS) concerning the loss of a day schedule between Kamloops and the Alberta border and Highway 16 as opposed to the night schedules that are being retained by GCTU (5409-Westbound and 5020-Eastbound). The major concern expressed by employees was the reliance of twice a day service by GCTU to get to and from their home base and work at MWHS which is located in a rural remote area and the difficulty of fitting trips to their work schedules with the proposed reductions. However, no details were provided regarding transportation frequency other than a preference for daytime travel. Another major concern includes the access to larger

cities like Kamloops for essential services not located in Blue River and the impact the reductions will have on local residents who use GCTU in harsh winter conditions. The Blue River Community Association submits that the reductions will affect residents who commute to surrounding and distant communities and seasonal workers in reaching their workplaces.

For Clearwater, 1 individual submission was received noting that the remaining service by GCTU is not adequate and is inconvenient at night, especially for seniors who do not drive. Further submissions (3) were received from various organizations including the Wells Gray Country Service Committee; Tourism Wells Gray and the Joint Services Advisory Committee. All refer to the monopoly held by GCTU which should require them to provide acceptable and adequate service. (We note that anyone may apply to operate an ICB on any route in British Columbia.) They also refer to the negative impact of the reductions on freight or parcel delivery service. The jurisdiction of the Board relates to passenger transportation and not freight, and for this reason, the Board has not examined how the proposed reduction in passenger service would affect freight. We note, however, that GCTU stated that approval of the proposed route reductions made with this application would not cause the discontinuation of overnight package express service in those communities.

Other concerns relate to the vital transportation and tourism link for both workers and travelers and the inconvenience of night service regarding accommodation and access to available agents for tickets, and travel up and down the valley.

The Board notes that some comments refer to GCTU as a monopoly for inter-city bus service. Nonetheless, anyone may apply to operate an ICB service on any route in British Columbia.

By approving the changes requested, the Board finds that GCTU will remain operating 1 daily schedule in each direction both westbound and eastbound that will provide a transportation option and link with all current route points on Route N. The Northern Health Connections provides medically essential transportation options on key corridors between Valemount and Kamloops (with some additional services to Prince George and Vancouver).

Considering the availability of these services together with the applicant's RPM financial data for the schedules targeted for elimination which are significantly below the applicant's breakeven costs per mile of \$5.69 and further evidence that average passenger loads on the 2 remaining schedules (night trip ridership) are about 50% higher than those targeted for elimination (day trip ridership). The low number of submissions from people who use the route appears consistent with the daytime ridership data provided by GCTU.

GCTU proposes to reduce services by eliminating 2 daytime schedules with FY12 passenger loads which average 14 - 18 passengers per scheduled run. The Board also notes that revenue-per-mile information shows that for the 2 schedules targeted for elimination,

ridership is insufficient for GCTU to operate above the breakeven point. The Board finds that the minimum route frequency proposed by GCTU will ensure that the public continues to have inter-city bus service on this route and allow GCTU to improve its financial situation.

Route P: Kelowna - Vancouver

GCTU proposes to reduce minimum route frequency on Route P between Kelowna and Vancouver: from 3 trips daily in each direction to 2 (with different decreases in Chilliwack, Abbotsford, Langley and Coquitlam, and increased frequency in Hope).

GCTU's Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route. GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 29).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

City of Kelowna	District of Hope (increase)	City of Coquitlam
Westbank	City of Chilliwack	City of Vancouver
City of Merritt	City of Abbotsford	

Figure 12 provides a statistical summary of the 5 public comments received for this route. This total includes 3 late comments that were considered (received from government).

Figure 12: Public Comments Considered With Respect To Route P

Business: 0	Government: 2	Individual: 1	Other: 2
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The Board received one submission from a rider who travels between Chilliwack and Langley and the potential impact of the proposed service cuts on other schedules where the buses are often full. The writer expressed concern that the elimination of some schedules will increase the frequency that buses will be full between Chilliwack and Langley, and thus require more overnight stays.

Submissions from local government representatives were received from: the Regional District of Central Okanagan (RDCO) which expressed concerns as noted under Route B2 above and the Township of Langley which expressed a general opposition.

GCTU proposes to reduce services by eliminating 2 schedules with FY12 passenger loads which average 21 - 27 passengers per scheduled run. Few comments were received.

Transportation options continue to exist on this route – including daily schedules 5031 and 5013 westbound, and 5036 and 5098 eastbound (on GCTU Route P). The schedules earmarked for elimination (5038 and 5029) operate, respectively, a little below or above

the applicant’s breakeven RPM at \$5.69. Despite the marginal profitability of the two schedules GCTU targeted for elimination, the Board finds that the ridership is insufficient to sustain the current minimum route frequency established for the GCTU service. It also finds that the proposed minimum frequency reflects the level of public need on this route.

Route S1: Vancouver – Mount Currie

GCTU proposes to reduce minimum route frequency on Route S1 between Vancouver and Mount Currie (north of Pemberton). The applicant proposes different changes for different route points; however, it proposes reductions between Vancouver and Whistler from 8 trips daily in each direction to 4, and reductions between Whistler and Pemberton from 4 trips daily to 3.

GCTU’s Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route. GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 30).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

City of Vancouver	District of Squamish	Whistler Creek
City of West Vancouver	Dentville	Whistler Village
Horseshoe Bay	Garibaldi Highlands	Alpine Meadows
Sunset Beach	Brackendale	Emerald Estates
Village of Lions Bay	Pinecrest / Black Tusk	Village of Pemberton
Furry Creek	Function Junction	Mount Currie
Brittania Beach	Twin Lakes	

The Board notes that GCTU provides a connector bus service to Horseshoe Bay which is not subject to the inter-city bus licensing requirements of the Passenger Transportation Act. The connector bus service is not discussed further in this decision.

Figure 13 provides a statistical summary of the 40 public comments received for this route. This total includes 1 late comment from government that was considered.

Figure 13: Public Comments Respecting Route S1

Business: 5	Government: 5	Individual: 29	Other: 1
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Overview of Submissions

Submissions were received from local and regional governments on Route S1 including the Squamish-Lillooet Regional District (SLRD), the District of Squamish, the Resort Municipality of Whistler, the Village of Pemberton and the Township of Langley.

Regarding procedural matters, several local governments expressed concerns about the short deadline (Oct 24, 2012) and timeline for governments, residents, visitors and other stakeholders to prepare submissions for consideration by the Board with respect to the application. Further, requests were received that the Board convene a public hearing on the application. Such comments were received from the Resort Municipality of Whistler, the District of Squamish, the SLRD, and the Pemberton and District Chamber of Commerce.

The Board has reviewed these requests noting that the original deadline for submissions was extended for a week, although this was due to a correction to the application summary. As well, relevant, late submissions which could assist the Board in its decision making were considered. Although Route S1 attracted the most comments of any route in this application, the Board found that the information and concerns conveyed in the written submissions provided it with a cross-section of perspectives (including individual users and government) that were of use when considering its decision on this route. The Board does not see that a public hearing on route S1 would significantly assist the Board in reaching a decision.

Several submissions note the need to factor in GCTU's cargo business when considering service reductions due to the reliance on this service by businesses and farmers in the community. The jurisdiction of the Board relates to passenger transportation and not freight, and for this reason, the Board has not examined how the proposed reduction in passenger service would affect freight. We note, however, that GCTU stated that approval of the proposed route reductions made with this application would not cause the discontinuation of overnight package express service in those communities.

Most individual submissions were received from the Squamish area (12) Whistler (7) and Pemberton (8). A few others were received from Vancouver (2).

The Board received a submission from the Pemberton and District Chamber of Commerce and from 4 local businesses: Whistler (2) and Pemberton (2).

Pemberton

The Village of Pemberton submits that GCTU's proposed reduction of service is due to its lack of consultation with local governments. It asks for consultation to find alternatives before the Passenger Transportation Board grants approval of its requested reductions. The Pemberton and District Chamber of Commerce and a local business made a similar request.

The Board received 8 submissions from individuals living in Pemberton. All but one expressed their dependence (or that of their colleagues) on the GCTU bus service to commute to their place of work in Whistler and return home. One phrased it as providing a "transit option" and the need to get creative about commuter transit serving Squamish-Whistler-Pemberton as commuter towns.

One submission referred to GCTU's lack of customer service and noted the variability of ridership numbers and asked the Board to take a careful look at the average ridership numbers supplied by GCTU. The Board is satisfied with the detail of ridership, financial information and schedules that GCTU provided.

A submission from a lodge in Pemberton reports concerns that the reduction in GCTU service will detrimentally impact its business and others and that it relies on the inter-city bus service.

Whistler

The Resort Municipality of Whistler (Whistler) notes that the GCTU application proposes significant cuts and acknowledges that losses are being incurred by GCTU under the current route and frequency structure. It refers to its recent process of service reductions regarding its own transit system and the need to change routes and frequencies to eliminate waste and reduce low-revenue routes. That said, it desires a "thoughtful and thorough approach to route and frequency rationalization using local government knowledge". As an example, it points out that travel time from Vancouver to Pemberton has been reduced as a result of highway improvements and that GCTU schedules have not been adjusted. Thus, the GCTU bus sits in Squamish for 15-20 minutes on every trip. In its estimation, a change in the timing of schedules could ameliorate the scope of the reductions proposed on many of the schedules.

Whistler claims the proposed reductions in services will have a negative impact on the municipality's reputation and associated resort economy including declines in sales and hotel taxes. It further notes that the proposed cuts by GCTU will hinder affordable travel for residents on the Pemberton - Whistler - Squamish corridor. Also, the reductions do not help with options for those wanting to reduce their carbon footprint or who do not drive.

The Board received 2 submissions from businesses in Whistler and 1 from the Supervisor, Visitor Services at Tourism Whistler. They refer to the need for GCTU service between Vancouver and Mount Currie that supports many employees (regular and seasonal) who travel to work and return daily from Squamish and other locales on the corridor. Several note it is an essential service for those without a car to access services such as specialized medicine and is good for the environment. One observes, as the corridor grows, so does the need for reliable, frequent transportation options.

Seven (7) submissions from individuals in Whistler were received. The major issue referred to the need and reliance on travel between Whistler and Vancouver for reasons such as work-related meetings, medical appointments and treatment. One of the submissions observed that if BC Transit were to take over by offering more routes along the corridor, then cutting GCTU service would make sense. Others mentioned the issue of GCTU raising fares to what the market will bear. Others believe the fares are too high for the poor level of service.

One individual supports some cuts, but makes suggestions regarding the re-timing of certain routes between Whistler and Vancouver.

Squamish and Garibaldi Highlands

A government representative expressed concern that a \$50.00 fee for public comments was unfair for those impacted by the GCTU proposal. However, the Board had previously waived the submission fee for this inter-city bus application.

The submission from the SLRD is similar to those of other governments on this corridor and included a position paper by its Director of Administrative Services. The paper includes the following points:

- Losses by GCTU on the Sea-to-Sky corridor are the result of older buses that frequently break down, incur high maintenance costs; “little effort to schedule services in a manner that would attract **Commuters**” (emphasis added); poor marketing; lack of debit/credit options for payment and a complete lack of effort to cooperate with local governments and the province and to discuss options and opportunities with BC Transit.
- In 2011 GCTU received additional compensation through the Pemberton Valley-BC Transit Annual Operating Agreement for approximately 13,000 rides between Pemberton and Whistler and a similar arrangement with GCTU was in place prior to the collapse of the Squamish-Whistler commuter service provided by BC Transit. The proposed GCTU cuts remove an option to arrive in Whistler by bus from Squamish prior to 10:30 a.m.
- The SLRD Board’s policy over the years has been to encourage regional transportation options which “reflect a hesitation to embark upon **a full-fledged, public, regional transit option** where opportunities exist for private enterprise to promote and fulfill that demand.” (emphasis added). The SLRD has neither the financial nor the human resources to create and promote a public regional transit system and that “a substantive reduction in service **may also result in significant costs for the Regional District and its member municipalities** if it becomes necessary to find more costly alternative solutions to transportation issues in the region.” (emphasis added)
- Community residents and workers living in Squamish and Pemberton rely on GCTU to provide most of the inter-city bus service on the Sea-to-Sky corridor including Metro Vancouver.

The Board received 11 submissions from individuals living in Squamish. Close to half of these letters (2 were form letters) expressed their need and reliance on the GCTU schedules to get to and from work in Whistler. Several worry about their ability to continue working. Several specifically note the use of schedule 5074 (northbound) that departs Squamish at 7:30 a.m. with high ridership. Four submissions highlight the cancellation of the B.C Transit Squamish-Whistler Commuter service which increased reliance on GCTU. However, one submission observes that the cancellation of the

Commuter service to their understanding did not increase GCTU ridership – and that the overall result is less use of bus transportation options. This submitter states *“when BC Transit cut the 98 Commuter from Squamish to Whistler commuters suffered. Now, my only option for commuting to and from my job is threatened...”*

Other individual submissions note that the elderly, students, seasonal workers and others who do not drive rely on the GCTU service for travel on the whole Sea-to-Sky corridor for various reasons such work in Vancouver or Pemberton. Others complain about GCTU’s old buses and high maintenance costs, poor service, scheduling and marketing. One submission highlighted that not having a bus arrive at Whistler from Squamish before 10:30 a.m. for day skiers is unacceptable.

One submission from a resident in the Garibaldi Highlands reports frequent use of the GCTU service since the 2010 Winter Olympics. The individual reports examples of poor client service issues, poor communication and maintenance problems by GCTU and that if the total service improved, it could charge more.

Lower Mainland

Two submissions from individuals in Vancouver report that the buses they take to Squamish or beyond are always full. One spoke about the need for service for Whistler workers who live in Squamish. The other spoke about letting other bus operations compete in this market.

GCTU Replies

In response to the submissions from riders who argue that the approval of minimum route frequency reductions on Route S1 will result in a loss of transit services, GCTU states that it is not in the transit business in B.C. It reports that it is in the inter-city scheduled bus business and is not a public utility that should be expected to maintain money-losing schedules or to subsidize services what would otherwise be provided by publicly funded transit services – or which should not exist because of low ridership.

Of concern to GCTU was the cancellation by BC Transit, without any regulatory oversight, of the early morning and late afternoon transit service between Squamish and Whistler (BC Transit Route 98). It reports that this service stopped when the Resort Municipality of Whistler (Whistler) refused to continue to provide financial support to BC Transit. GCTU also notes its surprise that neither

...Whistler nor the Squamish-Lilloet Regional District (SLRD) would directly acknowledge that they are advocating that a private sector company should be forced to operate money losing commuter bus services that had been previously been provided by BC Transit.

Regarding public concerns about reduced frequency between Pemberton and Whistler, GCTU notes that BC Transit currently operates a four times daily (morning, afternoon and evening) commuter service in each direction.

GCTU commented on references to its monopoly in bus transportation on the Sea-to-Sky corridor by noting that the Passenger Transportation Board has approved inter-city bus licences to 4 carriers: GCTU (Licence 70414), Blue Cactus Coachline dba Snowbus (Licence 71298), Premier Pacific Coach Lines Inc. (Licence 70715) and Pacific Coach Lines Ltd. (Licence 70774).

Analysis

In all the submissions received from individual users, the main issue was travel for work/commuting purposes between Whistler and either Pemberton or Squamish. B.C Transit operates throughout the day between Pemberton and Whistler 4 times daily in each direction. Further, GCTU has stated that it will maintain 3 daily schedules between Pemberton and Whistler (4 from Pemberton to Whistler) that will provide transportation options throughout the day. With such transportation options, the community of Pemberton should not be impacted in a significant manner.

With regard to transportation options between Squamish and Whistler, GCTU states that it will keep operating 4 daily schedules in each direction. The Board notes that schedules operate throughout the day, and that schedule 5078 arrives in Whistler (from Vancouver and Squamish) at 09:30.

GCTU proposes to reduce services by eliminating 9 schedules with FY12 passenger loads which average between 5 and 28 passengers per scheduled run. A number of public and private transportation options continue to exist on this route. Although 1 schedule is marginally profitable, the statistical data shows that these 9 schedules, on average, operate below the current breakeven RPM of \$5.69. The Board finds that ridership on this route is not sufficient to sustain the current minimum route frequency established for the GCTU service. The Board also finds that the proposed minimum frequency reflects the level of public need for this route.

The Board makes two observations that are particularly germane to Route S1. First, many of the submissions raise concerns related to work activities for which they have less discretion with respect to the timing of their travel. Thus, the Board is setting a minimum notice period for implementing reductions in minimum route frequency. Details are set out in the conclusion.

The second observation relates to communication and coordination of local transit and transportation planners with private carriers such as GCTU. This is discussed in the conclusion at the end of this decision.

Routes: T, U & X: Vancouver Island

GCTU proposes the following changes on three Vancouver Island routes:

- Reduce service on Route T (Victoria – Nanaimo)
- Reduce service on Route U (Nanaimo – Campbell River)
- Eliminate Route X (Victoria – Mount Washington)

There is considerable overlap in the public comments received on these routes. The first two routes (T and U) are discussed together.

Route X connects passengers with a ski resort. The applicant proposes to eliminate this route. The decision discusses Route X separately.

Routes T & U: Victoria – Nanaimo – Campbell River

GCTU proposes to reduce minimum route frequency on Routes T and U. The proposed reductions vary for different communities on these routes. Generally, GCTU proposes to reduce minimum service between Victoria and Nanaimo (Route T) from 4 trips daily in each direction to 3 (and from 60 weekly trips total to 42). For communities other than Victoria, Duncan and Nanaimo, the minimum would be reduced from 3 trips daily in each direction to 1. On Route U between Nanaimo and Campbell River, GCTU proposes to reduce minimum service from 2 trips daily in each direction (with some extra trips each week) to 1 (with no extra trips each week). For intermediate points on this route (other than Nanaimo, Parksville, Courtenay and Campbell River) the total weekly minimum of 18 flag trips would be reduced to 14.

GCTU's Explanatory Paper specified the schedules it intends to eliminate if the Board approves the reduction in minimum route frequency that GCTU is seeking for this route. GCTU also provided ridership and revenue information for each of the schedules it intends to eliminate on this route. A summary is provided in Appendix 1 (Figure 31).

If the Board approves the proposed reduction in minimum route frequency for this route, the following route points would be affected:

City of Victoria	Town of Ladysmith	Bowser
City of Langford	Cassidy	Fanny Bay
Goldstream	City of Nanaimo	Bulkley Bay
Malahat Lookout	City of Nanaimo	Union Bay
Mill Bay	Nanoose	Royston
Cobble Hill	Craig's Crossing	City of Courtenay
Cowichan Bay	City of Parksville	Merville
City of Duncan	French Creek	Black Creek
District of North Cowicahn	Town of Qualicum Beach	Oyster River
Saltair	Home Lake Road	District of Campbell River

GCTU's Explanatory Paper notes that inter-city bus service is operated by BC Transit on its Route U and T corridor. The BC Transit website lists the following corresponding inter-city transit services on Vancouver Island corridor between Victoria and Campbell River:

- The Route 66 Duncan Connector² (Cowichan Valley Regional Transit System) operates 4 daily trips in each direction Monday to Friday with service to the following communities that are also served by GCTU: **Duncan – Cowichan Bay – Frayne (near Mill Bay) – Langford – Victoria**
- The Route 99 Shawnigan Lake Connector³ (Cowichan Valley Regional Transit System) operates 2 daily trips in each direction Monday – Friday with service to the following communities that are also served by GCTU: **Cobble Hill - Frayne (near Mill Bay) – Langford – Victoria**
- The Route 90 Intercity route⁴ (Regional District of Nanaimo Transit System) operates daily trips in the morning, afternoon and evening in each direction, 7 days a week, to the following communities that are also served by GCTU: **Qualicum Beach – Parksville – Nanoose – Nanaimo**
- Route 10 between Courtenay and Fanny Bay⁵ (Comox Valley Regional Transit) operates daily trips 7 days a week (ranging between 5 trips in each direction Monday to Friday and 1 trip in each direction on Sundays) to the following communities that are also served by GCTU: **Courtenay – Royston – Union Bay – Buckley Bay – Fanny Bay**
- Route 12 North Valley Connector to Oyster River⁶ (Comox Valley Regional Transit) operates daily trips Monday to Saturday (2 – 5 trips daily in each direction) to the following communities that are also served by GCTU: **Oyster River – Black Creek – Merville – Courtenay**
- Route 6 Oyster River⁷ (Campbell River Transit System) operates 5 – 8 daily trips in each direction 7 days a week to the following communities that are also served by GCTU: **Oyster River – Campbell River**

Figure 14 provides a statistical summary of the 28 public comments received for Route T and 34 comments for Route U. Many of the comments related to proposed changes to two or three of the routes on Vancouver Island. These totals include 1 late comment from an individual that was considered on Route T and 2 late comments from individuals that were considered on Route U.

² Information retrieved from: <http://www.transitbc.com/regions/cow/schedules/schedule.cfm?line=66&>

³ Information retrieved from:

<http://www.transitbc.com/regions/cow/schedules/schedule.cfm?rmnu=dvSchedule&line=99&>

⁴ Information retrieved from: <http://www.transitbc.com/regions/nan/schedules/schedule.cfm?line=90&>

⁵ Information retrieved from:

<http://www.transitbc.com/regions/com/schedules/schedule.cfm?p=day.text&route=10%3A0&day=1&>

⁶ Information retrieved from: <http://www.transitbc.com/regions/com/schedules/schedule.cfm?line=12&>

⁷ Information received from:

<http://www.transitbc.com/regions/cam/schedules/schedule.cfm?p=day.text&route=6%3A0&day=1&>

Figure 14: Public Comments Respecting Routes T and U

T	Business:	9	Government:	3	Individual:	14	Other:	2
U	Business:	9	Government:	6	Individual:	17	Other:	2

The Board received 9 submissions from businesses regarding the proposed changes in minimum route frequencies to Routes T and U. Eight (8) of these submissions expressed concerns regarding freight services and the shipments of supplies and products that they depend through GCTU services. The jurisdiction of the Board relates to passenger transportation and not freight, and for this reason, the Board has not examined how the proposed reduction in passenger service would affect freight. We note, however, that GCTU stated that approval of the proposed route reductions made with this application would not cause the discontinuation of overnight package express service in those communities.

One of the 9 business submissions came from Tofino Bus Service Inc. (Tofino Bus). The letter indicates that the average passenger loads for schedules that GCTU proposes to eliminate are similar to its best year and profitable with its business model. It also observes that if these routes are lost there will be a public need for another bus company to provide the service and that it will apply to provide an ICB service between Nanaimo and Campbell River. This would offset its loss of connecting schedules with GCTU and allow it to open up a schedule that it already has travelling between Victoria and Nanaimo. Tofino Bus applied to amend its licence so it can provide service on the Victoria – Campbell River corridor which also connects with the services it provides to Tofino. The Board has not yet made a determination on the Tofino Bus application.

The Board also received overlapping submissions from individuals regarding minimum route frequency reductions to Routes T and U. Several came from out- of-province residents or unknown locations. A few referred to the regular use of the service at specific route points. Concerns related to the environment; and service usage by students, the elderly and others who do not drive, to get to medical appointments, visit friends and relatives. A submission respecting Route U noted the particular hardship of having to “waste a day” to wait for a bus to depart Courtenay due to the cancellation of a morning departure related to Schedule 5107. Another considered the morning departure from Courtenay as vital to make timely day-time links to the rest of the Island and the Lower Mainland via BC Ferries. Several did not want further cuts to what they believe to be an already limited service. An individual, bi-weekly user from West Vancouver (via Nanaimo to Courtenay) describes a consistent erosion of GCTU services over the last 2 years and observes that “Vancouver Island has never been a money maker” and that ridership and cargo can be sporadic at the best of times. This person urges compromises for major routes regarding Victoria, Nanaimo and Campbell River and allowing other inter-city bus carriers to provide service. An out-of province submission wanted the rail network overhauled and enhanced bus service as link points to the railway.

The Board received submissions from local governments. A letter from the City of Parksville notes a Council resolution that conveys opposition to GCTU's application for route frequency reduction concerning Routes T and U.

The Comox Valley Regional District (CVRD) submits that it does not support the service reduction between Nanaimo and Campbell River (Route U). The CVRD notes both its regional growth and sustainability strategies that include the improvement of transportation options to its residents and the expansion of the inter-regional transportation system critical to its economy and the environment. Other submissions from the City of Campbell River, the City of Courtenay, the Strathcona Regional District and the City of Courtenay expressed concerns on the minimum route frequency reduction in GCTU services between Nanaimo and Campbell River (Route U). These letters expressed opposition and outlined concerns regarding the negative impacts to residents and those of the North Island regarding the reduction in GCTU services between Nanaimo and Campbell River. Several noted the reliance by seniors on the service for travel on the island.

The CVRD, with regard to Route T between Victoria and Nanaimo, points out that while ridership numbers are down, it has received community feedback that improved schedules and marketing might improve ridership. It considers the reduction as significant, impacting many people. Also in regard to Route T, the Town of Ladysmith stresses the importance of a comprehensive public transportation connection to Nanaimo serving Ladysmith and all the communities in the CVRD. Of a specific concern to it were the proposed reductions from 4 daily stops in Ladysmith to 1 stop. It notes that it is in current discussions with BC Transit concerning expansion of its services north to Nanaimo. Ladysmith also says it would consider the possibility of subsidizing GCTU tickets as an alternative to the expansion plan. GCTU responded to the letter from Tofino Bus and its intention, should the Board approve GCTU's application for minimum route frequency reductions to Routes T and U, to apply to expand its operation on the corridor. It notes that it will not oppose an application by Tofino Bus, but alerts the Board to be mindful of whether Tofino Bus will apply to serve all the route points GCTU is obligated to serve between Victoria and Campbell River or, alternatively, to operate an express service. The applicant also refers to the competition it faces from IslandLink Bus Services that operate under an exemption providing "connector bus service" between Victoria, Tofino and Campbell River and the B.C. Ferry Terminal at Departure Bay and airports in Nanaimo and Comox.

Analysis

Alternate transportation options are provided by BC Transit for some sections of Route T: 4x daily Monday to Friday in each direction between Victoria and Duncan and 2x daily Monday to Friday in each direction between Victoria and Cobble Hill. As noted by GCTU, IslandLink also provides a connector bus service between Campbell River, Tofino and Victoria. Further, GCTU says it will maintain daily service between Nanaimo and Victoria with 3 southbound schedules (i.e. schedules 5103, 5105 and 5115) and 3 northbound schedules (i.e. 5102, 5110 and 5116).

On Route U, alternate daily transportation options are provided by BC Transit for many communities now served by GCTU. These inter-city transit services are provided by the Regional District of Nanaimo Transit System, the Comox Valley Regional Transit and the Campbell River Transit System. All with the exception of the Comox service between Oyster River and Courtenay (Monday to Saturday) are provided in a combined fashion service 7 days per week to 13 of 17 of the route points served by GCTU on its Route U. As noted above, IslandLink Bus Services provides a “connector bus” service.

GCTU application information shows that 2 schedules impacted by this minimum route frequency reduction (5118 and 5117) are operating significantly below its current breakeven RPM and that 2 (5110 and 5107) are marginally above the RPM. The Board notes the broad coverage over most route points by BC Transit and the availability of private transportation for some communities (e.g. Tofino Bus Services Ltd. which offers daily and Friday and Sunday services between Nanaimo and Parksville and the IslandLink service). The Board notes that limited details were provided in the submissions from individuals and local governments regarding actual usage.

GCTU proposes to reduce services by eliminating 6 schedules with FY12 passenger loads which average between 7 and 20 passengers per scheduled run. GCTU proposes to reduce services on Routes T and U by eliminating 6 schedules with average passenger loads of between 7 and 20 passengers per scheduled run. A number of public and private transportation options continue to exist on this route. Although 2 schedules are marginally profitable, the statistical data shows that the 6 schedules, as an overall average, operate below the current breakeven RPM of \$5.69. The Board finds that ridership for these schedules is not sufficient to sustain the current minimum route frequency established for the GCTU service. The Board also finds that the proposed minimum frequency reflect the level of public need on this route.

Route X: Victoria – Mt. Washington Alpine Resort

GCTU proposes to eliminate its seasonal ski service between Victoria and the Mt. Washington Alpine Resort. This service operates at a minimum of 3 trips weekly in direction.

GCTU’s Explanatory Paper specified the schedules it intends to eliminate if the Board approves an elimination of this route. GCTU also provided ridership and revenue information for the schedules that are now operated on the route. A summary is provided in Appendix 1 (Figure 32).

If the Board approves the proposed elimination of the route, the following route points would be affected:

City of Victoria
District of Saanich
Town of View Royal
City of Langford
Mill Bay

City of Duncan
District of North Cowichan
Town of Ladysmith
City of Nanaimo
Nanose

City of Parksville
City of Courtenay
Mt. Washington Alpine Resort

GCTU's Explanatory Paper states that this service is offered by a number of other bus carriers, and that it will continue to operate scheduled daily bus service between Victoria and Courtenay/Comox.

Figure 15 provides a statistical summary of the 17 public comments received for this route. This total includes 1 late comment from an individual that was considered.

Figure 15: Public Comments Respecting Route X

Business: 7	Government: 2	Individual: 7	Other: 1
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None of the individual submissions referred directly to the elimination of Route X. Comments from a number of government representatives included some generic references opposing GCTU's exit from Route X.

GCTU noted that alternative transportation options are available for this seasonal ski service. The route may be used by resort employees but generally, it is a discretionary service that does not appear to serve as a key link to its network of scheduled bus services on Vancouver Island. The data indicates the service has low ridership. Further, the service is offered by other private carriers such as Smith Transportation Ltd. (Smith Ski Bus) and the seasonal ski service operated by Footprints Adventure Ltd.

Alternative options are available to the public for travel from Victoria to Mt. Washington. The Board finds an insufficient level of public need exists for GCTU to maintain Route X and grants its proposal to eliminate the route.

VII. Conclusion

The Board reviewed comments from the public and information provided by the applicant. It considered information and evidence relating to public need, economic conditions of the passenger transportation business and applicant fitness. For the reasons set out in this decision, the Board is approving the applicant's proposal to reduce minimum route frequency on 15 routes and eliminate 1 route. As a result of these approvals, the Board is making further changes to the terms and conditions for Route C.

In considering the comments and proposals made by the public and the applicant, the Board observed a lack of ongoing communication between local governments and agencies (including transit and health authorities) and GCTU. A similar observation was made after

the Board held public meetings in 2009 for a previous application (X71-09) by GCTU to reduce service. The following is an excerpt from the Board decision which relates to GCTU Route D through the Kootenays:

It is clear from our investigation through the public meeting process that no meaningful dialogue has previously taken place between the parties who are involved in delivering different passenger transportation services to the public in the Kootenays. These parties include: GCTU; BC Transit; the Interior Health Authority; and the Regional Districts of West, Central and East Kootenay. As well, many municipalities, school districts and post-secondary educational facilities have an interest in this broad matter of passenger transportation. We clearly saw willingness, on the part of some elected representatives and many members of the public, to work toward solutions that would support service levels for GCTU along Route D. While the Board has no specific mandate to facilitate these discussions, we believe it is in the public interest for this dialogue to occur. These discussions could lead to more efficient use of resources and perhaps, by employing the skills and knowledge of the various parties, schedules could be developed that complement GCTU's long haul services.

The lack of dialogue and coordination that existed in the Kootenays appears common in many communities today where GCTU operates. Again, we encourage community representatives and GCTU (and other commercial inter-city bus operators) to engage more proactively in dialogue for sharing transportation expertise and greater integration of public and private transportation services in the province. Such efforts may result in cost-effective improvements in service and social and economic benefits for the public.

It is Board policy to require that public notice of at least 7 days be given before implementing reductions in minimum route frequency. In this instance, the Board approved changes that affect 16 of 19 routes on the GCTU network for British Columbia. We see the magnitude of these changes as significant for those who rely on GCTU services for travel. Thus, except for Routes S1 and X, the Board is extending the public notice period to 14 days.

On Route S1 (Vancouver – Squamish – Pemberton – Mt. Currie), the Board heard that a lot of people use GCTU services on the Sea-to-Sky corridor for non-discretionary travel between home and work. In this circumstance where many people will likely need additional notice to coordinate transportation changes with an employer, the Board is requiring that GCTU provide 21 days public notice.

With respect to the Route X seasonal ski service (Victoria – Mt. Washington), the Board does not see that special circumstances exist for extending the public notice requirement on this route. Thus, the 7-day public notice period applies to Route X.

APPENDICES

Appendix 1: GCTU Schedule Information

GCTU provided information about the schedules it intends to eliminate if the Board approves application 305-12. For each of its schedules, GCTU provided ridership and revenue-per-mile (RPM) for fiscal years (FY) 2012, 2011 and 2010. The Board accepted this as evidence for the applicant's rationale for amending its Passenger Transportation (PT) licence.

With some current schedules, GCTU exceeds its minimum route frequency. For this reason, some of GCTU's intended changes in its operational frequency (as noted in its schedules) do not match the change GCTU proposes in minimum route frequency for its PT licence as set out in the application.

Route A: Alberta – Vancouver (via Highway 1)

Figure 16: GCTU Route A Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5001 (westbound)	24.1 FY12	\$5.25 FY 12
Dep. Salmon Arm: 07:30	23.6 FY 11	\$4.93 FY11
Arr. Vancouver: 15:05	23.7 FY 10	\$5.01 FY 10
5014 (eastbound)	26.4 FY12	\$5.68 FY12
Dep. Vancouver: 12:30	26.4 FY 11	\$5.53 FY 11
Arr. Salmon Arm: 21:05	24.8 FY 10	\$5.24 FY 10
5012 (eastbound)	24.8 FY 12	\$5.09 FY 12
Dep. Vancouver: 09:30	22.2 FY 11	\$4.33 FY 11
Arr. Kamloops: 14:40	21.7 FY 10	\$4.25 FY 10

Route B2: Kelowna – Penticton

Figure 17: GCTU Route B2 Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5023⁸ (southbound) Partial Schedule Dep. Kelowna: 10:15 Arr. Penticton: 11:30	11.97 FY12 13.67 FY 11 12.98 FY 10	\$2.93 FY12 \$3.22 FY 11 \$2.95 FY 10
5025 (southbound) Dep. Kelowna: 15:15 Arr. Penticton: 16:35	8.97 FY12 10.01 FY 11 13.49 FY 10	\$3.02 FY12 \$3.02 FY 11 \$3.78 FY 10
5021⁹ (northbound) Partial Schedule Dep. Penticton: 14:40 Arr. Kelowna: 15:55	7.95 FY12 6.53 FY 11 6.69 FY 10	\$2.18 FY12 \$1.75 FY 11 \$1.74 FY 10
5094¹⁰ (northbound) Partial Schedule Dep. Penticton: 17:00 Arr. Kelowna: 18:15	13.1 FY12 15.55 FY 11 15.48 FY 10	\$3.21 FY12 \$3.68 FY 11 \$3.57 FY 10

Route C: Vancouver – Rock Creek

Figure 18: GCTU Route C Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5006 (eastbound) Dep. Vancouver: 00:30 Arr. Penticton: 05:50	22.31 FY12 19.5 FY 11 22.4 FY 10	\$4.27 FY12 \$3.82 FY 11 \$4.03 FY 10
5008 (eastbound) Fri/Sa/Sun/Mon Dep. Vancouver: 06:00 Arr. Rock Creek: 15:15	11.58 FY12 10.7 FY 11 11.0 FY 10	\$2.93 FY12 \$2.60 FY 11 \$2.49 FY 10
5021³ (northbound) Partial Schedule Dep. Rock Creek: 12:40 Arr. Penticton: 14:30	7.95 FY12 6.53 FY 11 6.69 FY 10	\$2.18 FY12 \$1.75 FY 11 \$1.74 FY 10
5024 (southbound) Partial Schedule Dep. Penticton: 10:00 Arr. Rock Creek: 11:50	4.07 FY12 4.02 FY 11 4.2 FY 10	\$1.11 FY12 \$1.06 FY 11 \$1.08 FY 10

⁸ GCTU statistics are for the entire route between Vernon and Penticton.

⁹ GCTU statistics are for the entire route between Kelowna and Rock Creek.

¹⁰ GCTU statistics are for the entire route between Kamloops and Penticton.

Route D: Kelowna – Alberta (via Highway 3)

Figure 19: GCTU Route D Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5026 (eastbound)	12.48 FY12	\$2.68 FY12
Fri/Sat/Sun	13.00 FY 11	\$2.72 FY 11
Dep. Kelowna: 00:15	17.7 FY 10	\$3.72 FY 10
Arr. Alberta Border (Crowsnest Jct, BC): 12:36		
5163 (westbound)	11.53 FY12	\$2.51 FY12
Thur/Fri/Sat	12.07 FY 11	\$2.58 FY 11
Dep. Alberta Border (Crowsnest Jct, BC): 13:12	13.02 FY 10	\$2.76 FY 10
Arr. Kelowna: 23:20		

Route E: Prince George – Vancouver

Figure 20: GCTU Route E Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5015 (southbound)	21.24 FY12	\$4.46 FY12
Dep. Prince George: 16:30	20.11 FY 11	\$3.74 FY 11
Arr. Vancouver: 05:15	14.72 FY 10	\$2.86 FY 10
5040 (northbound)	11.22 FY12	\$2.33 FY12
Dep. Kamloops: 16:30	15.99 FY 11	\$2.25 FY 11
Arr. Prince George: 23:25	16.35 FY 10	\$3.17 FY 10

Route G: Alberta (via Highway 2) – Dawson Creek

Figure 21: GCTU Route G Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5229¹¹ (northbound)	10.67 FY12	\$2.37 FY12
Partial Schedule	10.55 FY 11	\$2.25 FY 11
Dep. Tom's Lake, BC: 14:25	10.38 FY 10	\$2.10 FY 10
Arr. Dawson Creek: 14:50		
5064 (southbound)	18.67 FY12	\$4.15 FY12
Partial Schedule	18.15 FY 11	\$3.88 FY 11
Dep. Dawson Creek: 20:00	14.42 FY 10	\$2.86 FY 10
Arr. Tom's Lake, BC: 20:25		

¹¹ Statistics are for the entire route Edmonton-Dawson Creek.

Route I1: Dawson Creek – Fort Nelson

Figure 22: GCTU Route I1 Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5229 (northbound)	10.1 FY12	\$2.62 FY12
Dep. Dawson Creek: 16:20	10.00 FY 11	\$2.44 FY 11
Arr. Fort St. John: 17:30	8.95 FY 10	\$2.16FY 10
5064 (southbound)	9.38 FY12	\$2.43 FY12
Dep. Fort St. John: 18:30	9.01 FY 11	\$2.21 FY 11
Arr. Dawson Creek: 19:40	8.91 FY 10	\$2.10FY 10

Route J: Dawson Creek – Prince George

Figure 23: GCTU Route J Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5047 (westbound)	10.32 FY12	\$2.54 FY12
Tues to Sat	9.67 FY 11	\$2.25 FY 11
Dep. Dawson Creek: 15:35	8.71 FY 10	\$1.92 FY 10
Arr. Prince George: 20:35		
5060 (eastbound)	13.33 FY12	\$3.27 FY12
Dep. Prince George: 09:45	12.56 FY 11	\$2.93 FY 11
Arr. Dawson Creek: 16:15	11.41 FY 10	\$2.54 FY 10

Figure 24: GCTU Route J Schedules for Retention

Schedules	Average Passenger Load	Revenue per Passenger Mile
5045 (westbound)	18.40 FY12	Not supplied
Daily		
Dep. Dawson Creek: 09:30		
Arr. Prince George: 16:00		
5062 (eastbound)	18.85 FY12	Not supplied
Daily		
Dep. Prince George: 23:45		
Arr. Dawson Creek: 05:00		

Route K: Prince George – Ft. St. James

Figure 25: GCTU Route K Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5054 (eastbound) Tu/Wed/Thu/Fri Dep. Ft St James: 09:00 Arr. Prince George: 11:10	5.34 FY12 4.57 FY 11 6.92 FY 10	\$1.02 FY12 \$0.87 FY 11 \$2.15 FY 10
5056 (eastbound) Mon except Hol Dep. Ft St James: 10:00 Arr. Prince George: 12:10	7.41 FY12 2.91 FY 11 5.08 FY 10	\$2.63 FY12 \$0.97 FY 11 \$1.57 FY 10
5058 (eastbound) Fri except Hol Dep. Ft St James: 19:00 Arr. Prince George: 21:10	7.79 FY12 4.87 FY 11 6.92 FY 10	\$2.78 FY12 \$1.74 FY 11 \$2.15 FY 10
5041 (westbound) Mon to Fri Dep. Prince George: 16:00 Arr. Ft St James: 18:15	9.49 FY12 9.48 FY 11 5.51 FY 10	\$1.04 FY12 \$1.04 FY 11 \$1.72 FY 10
5043 (westbound) Mon except Hol Dep. Prince George: 07:15 Arr. Ft St James: 09:20	2.20 FY12 1.32 FY 11 2.89 FY 10	\$0.79 FY12 \$0.44 FY 11 \$0.90 FY 10

Route L1: Prince Rupert – Prince George

Figure 26: GCTU Route L1 Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5052 (eastbound) Daily except Wed Dep. Prince Rupert: 21:00 Arr. Prince George: 06:45	10.48 FY12 10.97 FY 11 10.32 FY 10	\$2.31 FY12 \$2.10 FY 11 \$2.14 FY 10
5039 (westbound) Mon to Fri Dep. Prince George: 22:30 Arr. Prince Rupert: 09:00	11.07 FY12 14.70 FY 11 10.00 FY 10	\$2.25 FY12 \$1.97 FY 11 \$2.06 FY 10

Route N: Alberta (via Highway 16) – Vancouver

Figure 27: GCTU Route N Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5401 (westbound)	13.98 FY12	\$2.82 FY12
Partial Schedule	12.15 FY 11	\$2.33 FY 11
Dep. Mt. Robson: 12:05	10.30 FY 10	\$2.12 FY 10
Arr. Kamloops: 16:45		
5044 (eastbound)	17.55 FY12	\$3.55 FY12
Partial Schedule	15.47 FY 11	\$2.97 FY 11
Dep. Kamloops: 12:15	14.03 FY 10	\$2.58 FY 10
Arr. Valemount ¹² : 16:25		

Figure 28: GCTU Route N Schedules for Retention

Schedules	Average Passenger Load	Revenue per Passenger Mile
5409 (westbound)	27.20 FY12	Not supplied
Partial Schedule		
Dep. Mt. Robson, BC: 00:55		
Arr. Kamloops: 05:55		
5020 (eastbound)	27.80 FY12	Not supplied
Partial Schedule		
Dep. Kamloops: 00:01		
Arr. Mt. Robson, BC: 04:12		

Route P: Kelowna – Vancouver

Figure 29: GCTU Route P Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5038(eastbound)	21.17 FY12	\$5.35 FY12
Dep. Vancouver: 14:15	21.73 FY 11	\$5.06 FY 11
Arr. Kelowna: 20:40	22.89 FY 10	\$4.69 FY 10
5029 (westbound)	27.11 FY12	\$6.86 FY12
Dep. Kelowna: 15:00	29.31 FY 11	\$6.82 FY 11
Arr. Vancouver: 21:05	29.75 FY 10	\$6.09 FY 10

¹² Schedule 5044 continues beyond Valemount to Edmonton

Route S1: Vancouver – Mount Currie

Figure 30: GCTU Route S1 Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5072 (northbound) Dep. Vancouver: 05:15 Arr. Whistler Village: 07:45	11.96 FY12 9.80 FY 11 15.30 FY 10	\$2.67 FY12 \$2.27 FY 11 \$3.74 FY 10
5074 (northbound) Dep. Squamish: 07:30 Arr. Pemberton: 09:25	6.28 FY12 3.48 FY 11 5.47 FY 10	\$1.00 FY12 \$0.40 FY 11 \$0.84 FY 10
5080 (northbound) Dep. Vancouver: 10:00 Arr. Pemberton: 13:40	22.52 FY12 23.54 FY 11 26.23 FY 10	\$5.62 FY12 \$5.62 FY 11 \$6.35 FY 10
5086 (northbound)¹³ Partial Schedule Dep. Whistler: 17:45 Arr. Pemberton: 18:25	26.14 FY12 26.06 FY 11 27.98 FY 10	\$6.51 FY12 \$6.19 FY 11 \$6.72 FY 10
5088 (northbound) Dep. Vancouver: 17:00 Arr. Whistler Village: 19:30	22.55 FY12 24.29 FY 11 29.74 FY 10	\$5.05 FY12 \$5.71 FY 11 \$7.10 FY 10
5071 (southbound) Dep. Pemberton: 05:25 Arr. Squamish: 07:05	5.57 FY12 3.92 FY 11 13.36 FY 10	\$1.38 FY12 \$0.95 FY 11 \$2.66 FY 10
5075 (southbound) Dep. Pemberton: 09:45 Arr. Vancouver: 13:15	27.51 FY12 27.05 FY 11 31.83 FY 10	\$6.85 FY12 \$6.33 FY 11 \$7.64 FY 10
5085 (southbound) Dep. Whistler Village: 17:00 Arr. Vancouver: 19:40	15.63 FY12 11.06 FY 11 11.38 FY 10	\$3.51 FY12 \$2.51 FY 11 \$2.46 FY 10
5089 (southbound) Dep. Whistler Village: 21:00 Arr. Vancouver: 23:15	12.26 FY12 13.80 FY 11 21.79 FY 10	\$2.75 FY12 \$3.27 FY 11 \$5.46 FY 10

¹³ Data is for the entire Vancouver – Pemberton trip. No breakdown is available for Whistler-Pemberton only.

Vancouver Island Routes: T & U

Figure 31: GCTU Route T & U Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5114 (northbound) Dep. Victoria: 13:30 Arr. Nanaimo: 15:45	14.63 FY12 16.60 FY 11 16.46 FY 10	\$5.38 FY12 \$5.56 FY 11 \$4.27 FY 10
5118¹⁴ (northbound) Fri & Sun Dep. Victoria: 19:00 Arr. Nanaimo: 21:00 Dep. Nanaimo: 21:30 Arr. Campbell River: 00:10	10.15 FY12 11.72 FY 11 15.22 FY 10	\$3.38 FY12 \$3.65 FY 11 \$3.93 FY 10
5110 (northbound) Partial Schedule Dep. Nanaimo: 15:10 Arr. Campbell River: 17:55	20.21 FY12 20.52 FY 11 23.72 FY 10	\$6.70 FY12 \$6.38 FY 11 \$6.10 FY 10
5107 (southbound) Partial Schedule Dep. Campbell River: 08:45 Arr. Nanaimo: 11:40	18.88 FY12 18.69 FY 11 19.75 FY 10	\$6.27 FY12 \$5.81 FY 11 \$5.07 FY 10
5109 (southbound) Dep. Nanaimo: 15:00 Arr. Victoria: 17:15	14.62 FY12 13.39 FY 11 15.32 FY 10	\$5.40 FY12 \$4.57 FY 11 \$3.97 FY 10
5117⁸ (southbound) Fri & Sun Dep. Campbell River: 17:30 Arr. Nanaimo: 20:15 Dep. Nanaimo: 21:30 Arr. Victoria: 23:45	7.40 FY12 9.73 FY 11 11.36 FY 10	\$2.43 FY12 \$3.00 FY 11 \$2.91 FY 10

Route X: Victoria – Mt. Washington Alpine Resort

Figure 32: GCTU Route X Schedules Targeted for Elimination

Schedules	Average Passenger Load	Revenue per Passenger Mile
5146 (northbound) Seasonal – Fri/Sa/Sun Dep. Victoria: 05:00 Arr. Mt. Washington: 08:40	2.79 FY12 4.72 FY 11 2.78 FY 10	\$0.34 FY12 \$0.65 FY 11 \$0.35 FY 10
5147 (southbound) Seasonal – Fri/Sa/Sun Dep. Mt. Washington: 16:00 Arr. Victoria: 19:40	4.55 FY12 4.07 FY 11 5.55 FY 10	\$0.56 FY12 \$0.52 FY 11 \$1.02 FY 10

¹⁴ Statistics are for entire route between Victoria and Campbell River.

Appendix 2: Licence

A Passenger Transportation Licence must be issued by the Registrar of Passenger Transportation under section 29 or renewed under section 34 of the Passenger Transportation Act before the special authorization approved in this decision may be exercised.

A. Direction to the Applicant Regarding Notice and Implementation

1. Greyhound Canada Transportation ULC must post notification of schedule changes on affected routes:
 - a. in a prominent location on Greyhound Canada Transportation ULC's website; and
 - b. at its terminals or agent premises along affected routes.
2. Notices of schedule changes referred to in 1 above may only be posted after 4:30 p.m. on January 16, 2013.
3. Subject to 2 above, Greyhound Canada Transportation ULC may not implement any of its schedule changes for a minimum of:
 - a. 21 days for Route S1,
 - b. 7 days for Route X, and
 - c. 14 days all other routesafter the date it posts notices of schedule changes referred to in 1 above.
4. Subject to 3 above, each notice of schedule changes referred to in 1 above must state the date on which the schedule changes are effective.
5. Greyhound Canada Transportation ULC must provide copies of the notices of schedule changes referred to in 1 above to the Registrar, Passenger Transportation before an amended licence may be obtained.

B. Direction to the Registrar of Passenger Transportation Regarding Issuance

1. Subject to 2 below, the Registrar of Passenger Transportation may issue a licence to Greyhound Canada Transportation ULC that reflects the amendments approved in this decision and set out in C. below, "Terms and Conditions of Licence".
2. An amended licence may only be issued after Greyhound Canada Transportation ULC has given the Registrar copies of notices that were posted at terminals and agent premises along affected routes and on its website. The notices must meet the requirements set out under A above, "Direction to the Applicant Regarding Notice and Implementation."

C. Terms and Conditions of Licence

Special Authorization	Inter-City Bus (ICB)
Terms & Conditions:	
Services:	
Service:	Transportation of passengers must be provided to and from each Route Points on a scheduled basis according to the daily minimum and/or weekly minimum route frequency that is set for the authorized route.
Schedule:	The licence holder must publish, in a manner accessible to the general public, a schedule for each route with the time and location of each stop, and must carry in each vehicle a copy of the schedule that the vehicle is following.
Express Authorization:	<p>Transportation of standees is authorized only when all of the following conditions are met:</p> <ol style="list-style-type: none"> 1. The licence holder has current and proper insurance coverage for the transportation of standees. 2. The operator does not permit passengers to stand for a period that is longer than 30 minutes while the vehicle is in motion except for routes S1, S2 and S3 from November 1 through until April 30 in which circumstances the operator does not permit passengers to stand for a period that is longer than 45 minutes or for a distance that exceeds 45 road kilometres while the vehicle is in motion. 3. Freight and passenger baggage is not carried in the passenger compartment when standees are being transported.
Abbreviations:	<p>The following abbreviations are used to describe terms and conditions of this special authorization.</p> <p>alt “alternate” Route Points that is not located directly enroute between other Route Points authorized by the Board; service may be provided to one or more alternate Route Points at the option and frequency of the licence holder on the condition that all minimum route frequencies approved or set by the Board are maintained.</p> <p>fd “flag” (where the vehicle will stop on signal to pick up a passenger) or “drop” (where the vehicle will stop on signal to drop off a passenger on board), or both.</p> <p>oc “on call” where the vehicle will only proceed to the community when an advance reservation is made for the pick up of a passenger or when a passenger requests drop off.</p> <p>n/a “not applicable”</p>

Route A

Terminating Point 1: Alberta Border & Highway 1		
Terminating Point 2: City of Vancouver		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
A1		
Alberta Border & Highway 1	n/a	n/a
West Louise Lodge	2fd	35fd
Field Junction	4fd	56fd
Town of Golden	4	56
Glacier Park East Gate	1fd	28fd
Rogers Pass (Glacier Pass Summit)	3	42
City of Revelstoke	4	56
District of Sicamous	4	56
City of Salmon Arm	2	35
A2 (a)		
City of Enderby	2	28
City of Armstrong	2	28
City of Vernon	2	28
Oyama	2fd	28fd
City of Kelowna	2	28
City of Vancouver	2	28
A2(b)		
Sorrento	1	14
Village of Chase	1	21
Monte Creek	1fd	14fd
City of Kamloops	3	42
City of Merritt	2	35
District of Hope	1	28
Agassiz	alt	alt
District of Mission	alt	alt
District of Maple Ridge	alt	alt
City of Chilliwack	3	42
City of Abbotsford	2	28
City or Township of Langley	0	14
City of Surrey	alt	alt
District of Delta	alt	alt
City of Richmond	alt	alt
City of Coquitlam	0	21
City of Vancouver	3	42

Route B1

Terminating Point 1: City of Kamloops		
Terminating Point 2: City of Kelowna		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
B1.1		
City of Kamloops	2	28
Monte Creek	0	7fd
B1.2(a)		
Monte Lake	0	7 fd
Westwold	0	7 fd
Falkland	1	21
B1.2(b)		
Village of Chase	0	7
Sorrento	0	7
City of Salmon Arm	0	7
City of Enderby	0	7
City of Armstrong	0	7
B1.3		
City of Vernon	3	42
Oyama	3 fd	42 fd
City of Kelowna Airport	0	7 fd
City of Kelowna	3	42

Route B2

Terminating Point 1: City of Kelowna		
Terminating Point 2: City of Penticton		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
City of Kelowna	2	28
Westbank (West Kelowna)	2	28
District of Summerland	2	28
City of Penticton	2	28

Route C

Terminating Point 1: City of Vancouver		
Terminating Point 2: Town of Osoyoos		
Scheduled Service Times Requirement:	On a minimum of four westbound trips weekly, scheduled pick ups in Osoyoos, Oliver and Okanagan Falls must enable passengers to be carried through to the City of Vancouver for scheduled drop off by 18:00 hours on the same day.	
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
City of Vancouver	1	14
City of Richmond	alt	alt
City of Surrey	alt	alt
District of Delta	alt	alt
City of Coquitlam	1	14
District of Maple Ridge	1	14
District of Mission	1	14
Agassiz	alt	alt
City of Abbotsford	1	14
City of Chilliwack	1	14
District of Hope	1fd	14
Allison Pass	1fd	14fd
Manning Park	1	14
Eastgate	1	14
Town of Princeton	1	14
Hedley	1	14
Village of Keremeos	1	14
Kaledan Junction	1fd	14fd
City of Penticton	1	14
Okanagan Falls	1	14
Town of Oliver	1	14
Town of Osoyoos	1	14

Route D

Terminating Point 1: City of Kelowna		
Terminating Point 2: Alberta Border & Highway 3		
Route Points	Daily Minimum (each direction)	Weekly Minimum (each direction ¹⁵)
City of Kelowna	1	7
Beaverdell	1	7
Rock Creek	1	7
Village of Midway	1	7
City of Greenwood	1	7
City of Grand Forks	1	7
Christina Lake	1fd	7fd
City of Castlegar	1	7
City of Trail	alt	alt
South Slokan Junction	0	7fd Weekly Total
City of Nelson	1	7
Village of Salmo	1fd	7fd
Junction 3 & 6	1fd	7fd
Summit	1fd	7fd
Town of Creston	1	7
Kitchener Junction	1fd	7fd
Yahk	1	7
Moyie	1fd	7fd
City of Cranbrook	1	7
Jaffray	1fd	7fd
Elko	1fd	7fd
City of Fernie	1	7
Hosmer	1fd	7fd
District of Sparwood	1	7
Natal	1fd	7fd
Michel	1fd	7fd
Crowsnest Junction	1fd	7fd
Alberta Border & Highway 1	n/a	n/a

¹⁵ Unless specified as a weekly total

Route E

Terminating Point 1: City of Prince George		
Terminating Point 2: City of Vancouver		
Service Limitation:	No service may be operated solely between the City of Prince George and the City of Prince George Airport.	
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
E1		
City of Prince George	2	28
City of Prince George Airport	1	14
Hixon	2	28
City of Quesnel	2	28
McLeese Lake	1fd	14fd
City of Williams Lake	2	28
Lac La Hache	2	28
District of 100 Mile House	2	28
70 Mile House	2	28
Village of Clinton	2	28
Village of Cache Creek	2	28
Route E2(a)		
Savona	1fd	14fd
City of Kamloops	1	14
City of Vancouver	1	14
Route E2(b)		
Spences Bridge	1	14
Shaw Springs	1fd	14fd
Village of Lytton	1	14
North Bend	1 oc	14 oc
Boston Bar	1	14
Spuzzum	1	14
Yale	1fd	14fd
District of Hope	1	14
Laidlaw	1 oc	14 oc
Bridal Falls	1 oc	14 oc
Aggasiz	alt	alt
District of Mission	alt	alt
District of Maple Ridge	alt	alt
City of Chilliwack	1	21
City of Abbotsford	1	21
City or Township of Langley	1	14
City of Surrey	alt	alt

District of Delta	alt	alt
City of Richmond	alt	alt
City of Coquitlam	0	14
City of Vancouver	1	21

Route F

Terminating Point 1: Alberta Border & Highway 93		
Terminating Point 2: City of Cranbrook		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
Alberta Border & Highway 93	n/a	n/a
Vermillion Crossing	1 fd	14 fd
Radium Aquacourt	1 fd	14 fd
Kootenay Park (West Gate)	1 fd	14 fd
Village of Radium Hot Springs	1	14
District of Invermere	1	14
Windermere	1 fd	14 fd
Fairmont Hot Springs	1	14
Columbia Lake Station	1 fd	14 fd
Canal Flats	1 fd	14 fd
Skookumchuck	1 fd	14 fd
City of Kimberley	1	14
Marysville	1 fd	14 fd
City of Cranbrook	1	14

Route G

Terminating Point 1: Alberta Border and Highway 2		
Terminating Point 2: City of Dawson Creek		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
Alberta Border and Highway 2	n/a	n/a
Tom's Lake	1fd	14fd
Village of Pouce Coupe	1fd	14fd
City of Dawson Creek	1	14

Route I1

Terminating Point 1: City of Dawson Creek		
Terminating Point 2: Town of Fort Nelson		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
City of Dawson Creek	1	14
District of Taylor	1	14
City of Fort St John	1	14
Wonowon	0	12
Pink Mountain	0	12
Buckinghorse River	0	12
Prophet River	0	12fd
Town of Fort Nelson	0	12

Route I2

Terminating Point 1: Town of Fort Nelson		
Terminating Point 2: Yukon Border & Highway 97		
Route Points	Weekly Minimum (each direction)	Total Weekly Minimum
Town of Fort Nelson	3	6
Steamboat	3 fd	6 fd
Summit Lake	3 fd	6 fd
Toad River Lodge	3	6
Muncho Lake	3	6
Liard River	3	6
Coal River	3 fd	6 fd
Fireside	3	6
Contact Creek	3 fd	6 fd
Iron Creek, Yukon	n/a	n/a
Lower Post	3 fd	6 fd
Yukon Border & Highway 97	n/a	n/a

Route J

Terminating Point 1: City of Dawson Creek		
Terminating Point 2: City of Prince George		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
City of Dawson Creek	1	14
Arras	1fd	14fd
Groundbirch	1fd	14fd
District of Chetwynd	1	14
Commotion Creek	1fd	14fd
Pine Valley	1fd	14fd
Azouetta Lake	1fd	14fd
Kennedy	1fd	14fd
Mackenzie Junction	1fd	14fd
District of Mackenzie	1	14
Mackenzie Junction	1fd	14fd
Windy Point	1fd	14fd
McLeod Lake Lodge	1fd	14fd
Bear Lake	1	14
Salmon River	1fd	14fd
City of Prince George	1	14

Route K

Terminating Point 1: City of Prince George	
Terminating Point 2: District of Fort St James	
Route Points	Weekly Minimum (each direction)
City of Prince George	1
Mud River	1
Telechik Road	1
Bednesti Resort	1
Finmore	1
Mapes Road	1
District of Vanderhoof	1
12 Mile	1
Dog Creek	1
District of Fort St James	1

Route L1

Terminating Point 1: City of Prince Rupert		
Terminating Point 2: City of Prince George		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
City of Prince Rupert	1	14
Port Edward Corner	1fd	14fd
Tyee	1fd	14fd
Kwinitsa	1fd	14fd
Shames	1fd	14fd
City of Terrace	1	14
Kitwanga Junction	1	14
Skeena Cross	1fd	14fd
District of New Hazelton	1	14
Moricietown	1fd	14fd
Town of Smithers	1	14
Village of Telkwa	1	14
District of Houston	1	14
Topley	1	14
Broman Lake	1fd	14fd
Village of Burns Lake	1	14
Fraser Lake	1	14
Fort Fraser	1	14
District of Vanderhoof	1	14
City of Prince George	1	14

Route L2

Terminating Point 1: City of Prince George		
Terminating Point 2: Alberta Border & Highway 16		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
City of Prince George	1	14
Bowron River	0	7 fd
Dome Creek	1 fd	14 fd
Crescent Spur	0	7 fd
Lamming Mills	0	7 fd
Village of McBride	1	14
Tete Jaune Cache Junction	1 fd	14 fd
Village of Valemount	1	14
Tete Jaune Cache Junction	1 fd	14 fd
Mount Robson	1 fd	14 fd
Alberta Border & Highway 16	n/a	n/a

Route N

Terminating Point 1: Alberta Border & Highway 16		
Terminating Point 2: City of Vancouver		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
Alberta Border & Highway 16	n/a	n/a
Mount Robson	1fd	14fd
Tete Jaune Cache Junction	1fd	14fd
Village of Valemount	1	14
Blue River	1	14
Avola Junction	1fd	14fd
Vavenby ¹⁶	1	14
Clearwater	1	14
Little Fort	1	14
Barriere	1	14
City of Kamloops	1	14
City of Merritt	0	7
District of Hope	0	7
Agassiz	alt	alt
District of Mission	alt	alt
District of Maple Ridge	alt	alt
City of Chilliwack	1	14
City of Abbotsford	0	7
City or Township of Langley	0	7
City of Surrey	alt	alt
District of Delta	alt	alt
City of Richmond	alt	alt
City of Coquitlam	0	14
City of Vancouver	1	14

¹⁶ 1 daily "intown" trip into Vavenby (each direction)

Route P

Terminating Point 1: City of Kelowna		
Terminating Point 2: City of Vancouver		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
City of Kelowna	2	28
Westbank (West Kelowna)	2	28
City of Merritt	2	28
District of Hope	2	28
Agassiz	alt	alt
District of Mission	alt	alt
District of Maple Ridge	alt	alt
City of Chilliwack	1	21
City of Abbotsford	1	28
City of Township of Langley	0	7
City of Surrey	alt	alt
District of Delta	alt	alt
City of Richmond	alt	alt
City of Coquitlam	1	14
City of Vancouver	2	28

Route S1

Terminating Point 1: City of Vancouver		
Terminating Point 2: Mount Currie ¹⁷		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
City of Vancouver	4	56
City of West Vancouver	4	56
Horseshoe Bay	0	7
Sunset Beach	4fd	56fd
Village of Lions Bay	4	56
Furry Creek	4fd	56fd
Brittania Beach	4	56
District of Squamish	4	56
Dentville	1fd	14fd
Garibaldi Highlands	4	56
Brackendale	3fd	42fd
Pinecrest / Black Tusk	3fd	42fd
Resort Municipality of Whistler		
Function Junction	3fd	42fd
Twin Lakes	3fd	42fd
Whistler Creek	4	56
Whistler Village	4	56
Alpine Meadows	3fd	42fd
Emerald Estates	0	28
Village of Pemberton	3	42
Mount Currie	1	14

¹⁷ Some trips may terminate at Whistler Village or the Village of Pemberton instead of Mt. Currie.

Route S2

Terminating Point 1: University Endowment Lands (UBC)	
Terminating Point 2: Resort Municipality of Whistler	
Seasonal Operation:	<p>Service must:</p> <ol style="list-style-type: none"> 1. start on a day in the month of November, 2. from the start as required under paragraph 1 above, continue to operate according to the total weekly minimum for this route until the cessation date under paragraph 3 (below), 3. cease operation on a day in the month of April, and 4. After the cessation date required under paragraph 3 (above), not operate at any time before the start date as required under paragraph 1 (above).
Route Points	Total Weekly Minimum
University Endowment Lands	6
City of Vancouver	6
City of West Vancouver	6
Resort Municipality of Whistler	6

Route T

Terminating Point 1: City of Victoria		
Terminating Point 2: City of Nanaimo		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
City of Victoria	3	42
City of Langford	1fd	14fd
Goldstream	1fd	14fd
Malahat Lookout	1fd	14fd
Mill Bay	1	14
Cobble Hill	1fd	14fd
Cowichan Bay	1fd	14fd
City of Duncan	3	42
District of North Cowichan	1	14
Saltair	1fd	14fd
Town of Ladysmith	1	14
Cassidy	1	14
City of Nanaimo	3	42
Emergency Routing:	When the Malahat portion of the Trans Canada Highway cannot be used, vehicles may be operated from the City of Victoria to the District of Saanich to the District of Central Saanich and, after crossing the Finlayson Arm by the Mill Bay Ferry, reconnect with the regular route at Mill Bay.	
Alternate Routing:	The Route Points set out above do not preclude the licence holder from, on any portion of Highway 1 that is situated on Vancouver Island, making scheduled time stops or conveying passengers who hail or flag the motor vehicle from the street.	

Route U

Terminating Point 1: City of Nanaimo		
Terminating Point 2: District of Campbell River		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
City of Nanaimo	1	14
Nanoose	1fd	14fd
Craig's Crossing	1fd	14fd
City of Parksville	1	14
French Creek	1fd	14fd
Town of Qualicum Beach	1fd	14fd
Home Lake Road	1fd	14fd
Bowser	1fd	14fd
Fanny Bay	1fd	14fd
Buckley Bay	1fd	14fd
Union Bay	1fd	14fd
Cumberland	alt	alt
Royston	1fd	14fd
City of Courtenay	1	14
Merville	1fd	14fd
Black Creek	1fd	14fd
Oyster River	1fd	14fd
District of Campbell River	1	14

Route W

Terminating Point 1: District of Campbell River		
Terminating Point 2: District of Port Hardy		
Route Points	Daily Minimum (each direction)	Total Weekly Minimum
District of Campbell River	1	14
Sayward & Highway 19	1 fd	14 fd
Village of Sayward	alt	alt
Woss Camp	1	14
Nimpkish Camp	1 fd	14 fd
Town of Port McNeill	1	14
Port Alice Junction	1 fd	14 fd
District of Port Hardy	1	14

Route Y

Terminating Point 1: City of Victoria	
Terminating Point 2: City of Vancouver	
<p>Limited Pick Up & Drop Off</p> <p>Tsawwassen Ferry Terminal – City of Vancouver</p>	<p><i>Southbound Route</i> Passengers may only be picked up at authorized Route Points on southbound trips from the City of Vancouver to the Tsawwassen Ferry Terminal. No passengers may be dropped off at these Route Points.</p> <p><i>Northbound Route</i> Passengers may only be dropped off at authorized Route Points on northbound trips from the Tsawwassen Ferry Terminal to the City of Vancouver. No passengers may be picked up at these Route Points.</p>
Route Points	Monthly Minimum (each direction)
City of Victoria	1
District of Saanich	1
District of Central Saanich	1
District of North Saanich	1
Town of Sidney	1
Tsawwassen Ferry Terminal	1
Vancouver International Airport	1
City of Vancouver	1

<p>Engaged Carrier Authorization:</p>	<p>The holder of this licence may operate as an inter-city bus when engaged by another licensed operator in the following limited circumstances:</p> <ol style="list-style-type: none"> 1. The other licensed operator must have a special authorization to operate an inter-city bus under a licence issued pursuant to the Passenger Transportation Act (British Columbia) or the Motor Vehicle Transport Act (Canada), 2. The holder of this licence must have signed written authorization from the other licensed operator specifying the terms by which the licence holder is engaged including the time period for which the written authorization is valid, 3. The holder of this licence must operate its vehicles in accordance with all the applicable terms and conditions of the other licensed operator's licence, and 4. The holder of this licence must carry in its vehicles a copy of the written authorization referred to in paragraph 2 and a copy of the terms and conditions of the other licensed operator's licence when operating under this engaged carrier authorization.
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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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