



Thursday, February 27, 2020

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ICBC Customer Relations
ATTN: ICBC Fairness Commissioner
151 West Esplanade
North Vancouver, BC
V7M 3H9

Dear Mr. Burns Q.C.

We are concerned with the recent changes to ICBC rules that require the listing of Driver's Licenses for any and all vehicle insurance renewals. The system appears to open up a can of worms that could be difficult and costly to manage, both from your side of things, and for your clients.

Some examples:

- Businesses have turnover in staff on a frequent basis. This turnover will create for extensive administration efforts on their parts and for your ICBC Brokers.
- Many organizations leverage the services of Volunteers. Just today when I went to re-insure a company owned vehicle I identified to the broker that we'd have volunteers driving the vehicle on occasion, especially during the summer months. Neither the broker nor the person contacted at ICBC could answer my questions how to deal with Volunteers. Your system identifies specific rules for employees yet there appears to be nothing pertaining to Volunteers. Are they employees? They're not paid, therefore, in my opinion they're not employees yet no one could confirm how to manage them for the purposes of periodic vehicle use.
 - It was also explained to me that 'Family' must be registered as a driver but... who is family for a business owned vehicle? If an employees' partner needs to drive for whatever reason are they part of the 'misc' drivers covered under the 12 times per year or, are they considered 'employees' thus they can't ever drive unless listed on the policy?
 - How will ICBC manage the likelihood of owners figuring out how to avoid listing suspect drivers who may on occasion use the vehicle? The 12 times per year thing appears to permit such potential abuse thus negatively affecting insurance premiums (for ICBC).
 - IE: "as example" *"My friend uses my truck once in a while for home use – perhaps picking up large items etc. I don't list him/her on my policy because I know that they've had some history of accidents and because of that I suspect that their name*

on my policy could negatively affect my premium. How does ICBC expect to manage that when it appears to be easy to navigate?"

Why isn't ICBC simply changing over to a Driver's pay format where premiums are collected based on driving performance? Why is ICBC placing so much administrative burden on Businesses and Individuals, and ultimately on your own Brokers with such a complex and potentially ineffective process? Why did the person at ICBC today suggest through our Broker that I needed to get Legal Advice on how to navigate the field of Volunteers? Will a Lawyer know? How can they know something that your own organization can't answer? Why would I have to engage a lawyer in the first place?

- And while I'm at it. Why can ICBC arbitrarily charge more to a 'young driver' for his/her insurance based on the performance of other drivers of the same age? Wouldn't that be considered as stereotyping?
- Shouldn't ICBC have set rates for X vehicles and apply those rates equally to all drivers **UNTIL** such time as their driving behavior suggests otherwise.

These changes really concern me as a Citizen and also as the CEO of an organization that works hard to assist the local Business Community. These changes will affect their administrative burden and they appear to place many organizations and individuals at risk of being uninsured or underinsured.

Yours truly,
ALBERNI VALLEY CHAMBER OF COMMERCE

Bill Collette
CEO