

July 4, 2012

Mr. David W. Danner  
Washington Utilities and Transportation Commission  
1300 S Evergreen Park DR SW  
PO Box 47259  
Olympia, WA 98504-7250

RE: Petition for forbearance from Auto Transportation regulation.

Dear Mr. Danner:

Bellair Charters operates both charter and excursion service in Washington State. We have been operating the Bellair Sports Shuttle for almost 10 years. This service is classified as an excursion and picks up passengers on Sundays at specified locations in Bellingham, Burlington and Marysville to take sports fans down to the Mariners and / or Seahawks games at either Safeco or CenturyLink Fields. Passengers are always picked up and returned to the same location on these excursions and tickets are sold as a round trip between boarding locations and the field; there are no one way fares.

Staff wrote to us in May concluding that our Sports Shuttles are, in fact, a scheduled service for which we have no transportation authority. Their direction to us was to immediately stop the service for our Burlington and Marysville passengers. Although we disagree with their conclusion we have complied with their direction.

Since stopping the service to these cities we have received dozens of complaints from our Burlington and Marysville passengers. Additionally, the loss of passengers has severely impacted the profitability of the service. Our customers have become accustomed to our Sports Shuttle service and truly appreciate the affordable convenience that it provides. It would be terribly unfortunate to be forced to halt the service due to an inability to fill the buses without the Burlington and Marysville passengers.

Staff has also suggested that we write to the Commission and request, under the rules of RCW 81.68.015, for forbearance from regulation. Forbearance is based on the fact that our Sports Shuttle transportation is solely for recreation, it is not adversely affecting the operations of the holder of the transportation certificate for this area (ourselves) and that it is in the public's interest. It does not make sense to put a halt to a popular service that fills a need to provide safe group transportation to Seattle sports events. We are simply asking to be allowed to continue providing a service that is not otherwise offered and which has proven to be greatly appreciated.

We would ask that you consider our request for forbearance as soon as possible.

Sincerely,

Richard Johnson