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## MEMORANDUM

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**DATE:** 8/28/17

**TO:** State of Washington Utilities and Transportation Commission

**FROM:** Taraha Baum, Senior Director of Legal and Compliance  
Professional Transportation, Inc.

**RE:** **DOCKET TR-170780**  
**WRITTEN COMMENTS**

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1. Does your company currently employ drivers that operate vehicles with a seating capacity of seven or fewer, including the driver, AND employ drivers that operate vehicles with seating capacity of eight or more, including the driver?

**PTI response:** PTI employs drivers that operate vehicles with a seating capacity ranging from 5 to 8 passengers, including the driver. Approx. 56% of the fleet has seating capacity of 7 or fewer, including the driver; and 44% of the fleet has seating capacity of 8, including the driver.

If so:

- a. Is there a difference in how your company manages its controlled substance and alcohol testing for each class of driver? If so, please explain.

**PTI response:** Drug and alcohol testing for a driver that operates a vehicle with 7 or fewer passengers, including the driver, are the same as drivers operating a vehicle with 8 passengers, including the driver.

- b. Are driver qualifications different for each class of driver? If so, please explain.

**PTI response:** Driver qualifications for a driver that operates a vehicle with 7 or fewer passengers, including the driver, are the same as drivers operating a vehicle with 8 passengers, including the driver.

- c. Are hours of service requirements different for each class of driver? If so, please explain.

**PTI response:** Hours of service requirements for a driver that operates a vehicle with 7 or fewer passengers, including the driver, are the same as a driver operating a vehicle with 8 passengers, including the driver.

- 2. Does your company currently operate vehicles with a seating capacity of seven or fewer, including the driver, AND operate vehicles with a seating capacity of eight or more, including the driver?

**PTI response:** PTI operates vehicles with a seating capacity ranging from 5 to 8 passengers, including the driver. Approx. 56% of the fleet has seating capacity of 7 or fewer, including the driver; and 44% of the fleet has seating capacity of 8, including the driver.

If so:

Is there a difference in how your company ensures safety of the equipment for each class of vehicle? If so, please explain.

**PTI response:** PTI policy for ensuring safety of the equipment is the same for all vehicles in the fleet.

- a. Is there a difference in how your company ensures safety of operations for each class of vehicle? If so, please explain.

**PTI response:** PTI policy for ensuring safety of operations is the same for all vehicles in the fleet.

- b. Is there a difference in how your company ensures passenger safety for each class of vehicle? If so, please explain.

**PTI response:** PTI policy for ensuring passenger safety is the same for all vehicles in the fleet.

- c. Is there a difference in how your company maintains records for each class of vehicle? If so, please explain.

**PTI response:** PTI's process for maintaining vehicle records is not based on size of the vehicle. State specific regulations and/or customer requirements may result in deviations from PTI's standard policy and procedure for maintaining records.

3. Does your company currently require driver safety training? If so:
- a. Please describe your training program (e.g., who provides the training, how long training is for new drivers, whether and how you provide ongoing refresher training for current drivers, etc.)

**PTI's response:**

Yes, driver safety training is one component of PTI's Safety Management System.

New drivers are required to take the following training:

Orientation - 8 hours of classroom training, conducted by trained

- Defensive Driving
- Fatigue Management
- Rail yard Safety
- Operation Lifesaver
- Safety rules
- Winter Driving

Road Test & In Vehicle Training - 4 hours of training

Active drivers take the following refresher training:

- Fatigue Management – annually and post-accident, depending on the type of accident
- Rail Yard Safety/Operation LifeSaver – annually and post-accident, depending on the type of accident
- Winter Driving – annually
- Animal/Driving in Rural Areas – annually
- Road Test – bi-annually and post-accident, depending on the type of accident

- a. Is the training the same for drivers of all vehicles, regardless of the size of the vehicle? If not, please explain.

**PTI response:** Training program is the same for all drivers, regardless of the size of the vehicle.