



1. Please elaborate on driver safety, qualifications, and training as follows:

a. How will company ensure adequate driver training?

Shuttle Express, Inc. utilizes three main phases to ensure driver training and qualifications. Our classroom training involves policies, procedures, and a road test. The driver is required to pass the road test and a final written test before moving on to the next phase of training. The next section is a three-day road skills and procedures while under the direction of a trainer the entire time. The driver must meet and demonstrate the skills required before moving on to the final step. This last phase is more advanced training geared around our larger vehicles. Minimum two days with this trainer and demonstration of the skills and abilities Shuttle Express requires.

b. Who will provide the training?

The Shuttle Express trainers we use during the above process include: Safety & Driver Performance Manager, Quality Assurance, and Senior Drivers as well as some periodic participation through our insurance provider National Interstate.

c. Is there refresher training?

Shuttle Express has quarterly safety meeting required for all drivers. Safety issues are reviewed and reemphasized. Shuttle Express, Inc. also has dashboard cameras in our vehicles. We use these to monitor our drivers' performance and to provide continuous safety training. We are constantly improving the quality of our drivers and experience for our guests.

d. How will the company manage drug and alcohol testing?

Shuttle Express is compliant with FMCSA Regulations for drug and alcohol testing. Pre-employment screening and random testing are done by a third party agency where we meet or exceed these requirements.

e. How will the company manage hours of service requirements?

Shuttle Express manages hours of service requirements with electronic logs in the vehicles. We are compliant with the current FMCSA ELD mandate.

f. Describe company protocol for when an accident occurs?

Shuttle Express accident policy includes: Driver immediate notification to the company via dispatch. Dispatchers are trained in the company guidelines for actions that may include depending on circumstances and severity: Ensuring proper emergency vehicles are notified, reminder of driver's responsibility, pulling driver from duty, drug and alcohol testing. Shuttle Express management reviews the accident reports and information to make decisions on what action needs to be taken with driver or

identify areas for improved company safety and training. Accident are reported and tracked in JJ-Keller under accident / incident files.

Accident Reporting Procedure

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Renton, WA 98057

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Follow this procedure if involved in an accident, defined as any time a company vehicle is in contact with any object.

1. If involved in an accident, the driver will:
 - a) Notify Shuttle Express Dispatch immediately.
 - b) Check if anyone onboard suffered injuries.
 - c) Notify emergency services/911 if necessary.
 - d) Follow direction and communication from Dispatch.
 - e) Keep guests calm and informed of what's happening.

2. Driver will communicate the following information to Dispatch:
 - a) Location of accident
 - b) Any injuries or suspected injuries
 - c) Extent of vehicle damage and other vehicular involvement
 - d) Disposition of Shuttle Express vehicle, i.e. blocking traffic, etc.
 - e) Any fuel leakage
 - f) If emergency services were contacted or are on location

3. Lead dispatcher will send an emergency text notification to Shuttle Express leadership.

4. In case of injuries, driver will contact emergency services/911 with direction from Dispatch:
 - a) Notify the appropriate police department.
 - b) Request ambulance / fire department services if required.

5. Dispatch will send a replacement vehicle and driver to scene of the accident, if required.

6. Dispatch will implement post-accident requirements for drug and alcohol testing if required, based on accident / regulatory compliance guidelines.

7. Driver will complete post-collision/accident report upon returning to office.

8. Driver report will be documented in JJ-Keller for record tracking.

9. Director of Service Operations will notify the insurance company with accident information for record only or open claim, depending on accident details.

10. The Post-Collision Committee will conduct a forum with the driver to review details of accident to determine preventable or non-preventable status.

11. Preventable / non-preventable internal procedures are followed in regards to documentation, driver safety re-training, and/or corrective action.



2.

a. How will the company complete annual vehicle inspections?

Shuttle Express currently uses JJ-Keller Encompass for vehicle fleet management, tracking and maintenance scheduling. JJ-Keller Encompass compliance system uses electronic on board recorders (EOBR) to provide Shuttle Express system document completion of DVIRs in addition to paper DVIR records. The system provides a way for DVIRs to be submitted and reviewed electronically as well as audit point when a vehicle is used but no DVIR is submitted. As a result this technology solution also allows us to keep track of vehicle fleet maintenance schedules for service and inspections for in-house maintenance facilities and/or utilization of outside certified resources. Independent contractor drivers are required to get vehicle and have registration changed to "For Hire". Wheelbase of vehicle must be 114.5 in or larger for sedan and 116 for SUV. Independent contractors also get an initial inspection in addition to annual inspections to remain in compliance.

b. How will company maintain vehicle records of inspections, repairs, and maintenance?

Shuttle Express currently uses JJ-Keller Encompass for vehicle fleet management, tracking and maintenance scheduling. JJ-Keller Encompass compliance system uses electronic on board recorders (EOBR) to provide Shuttle Express system document completion of DVIRs in addition to paper DVIR records. The system provides a way for DVIRs to be submitted and reviewed electronically as well as audit point when a vehicle is used but no DVIR is submitted. As a result this technology solution also allows us to keep track of vehicle fleet maintenance schedules for service and inspections.

c. How will the company ensure use of proper safety equipment?

Shuttle Express has a designated Driver Safety Performance Manager in addition to Quality Assurance and Senior training drivers to ensure proper usage of safety equipment.

d. How will the company ensure passenger safety?

Shuttle Express has a designated Driver Safety Performance Manager in addition to Quality Assurance and Senior training drivers to ensure passenger safety through proper driver training and safe equipment.

e. How will the company maintain records in general?

Shuttle Express provides initial driver training and on-going follow-up training through driver sessions, spot checks, ride-a-long participation, other media and special training seminars. Independent contractors go through a third party organization / Alliance 20/20 for proper credentials:

SAFETY

Seven Safety Agreements

Keeping in mind our vision of outstanding service with every trip, successful Shuttle Express drivers **drive safely** according to company policies. Our drivers agree to observe and follow these seven safety agreements:

1. I will always leave a minimum of three-to-four seconds of following distance between me and the car in front of me.
2. I will look for approaching traffic at every intersection and not assume others will yield to me.
3. I will use my mirrors to be sure I never hit a fixed object or another vehicle when changing lanes.

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4. I will avoid backing. If I must back, I will get out to look and then back slowly for as short a distance as possible.
5. I will always be by the door of my vehicle as a guest is entering or exiting.
6. I will be sure every person in my van is wearing a seat belt before we move.
7. I will always do a "walk-around" and look at the surroundings around my vehicle before I leave an area where I parked or after loading and unloading guests.

Drivers also agree to do the following:

- Drive defensively and adapt to the conditions and the actions of others.
- Demonstrate professional driving characteristics – be patient, consistent, and courteous.
- Report **all** accidents and moving violations immediately.
- Park the vehicle before using any wireless communication device(s).

Using Seat belts

Passengers and drivers are required to always wear seat belts/shoulder harnesses, including children sized for wearing seat belts. Before operating the vehicle, the driver must check passengers to ensure all seat belts/harnesses (including seat belts provided on wheelchairs, scooters, or other mobility devices) are properly worn and fastened. Driver will assist in fastening and unfastening restraint devices upon request or if the driver determines they are being worn incorrectly.

For passengers using wheelchairs, scooters, or other mobility devices, the driver must secure the wheelchairs/scooters by ensuring that the wheels are properly tied down and the brakes are locked.

Passengers who refuse to wear available, functioning seat belts/shoulder harnesses will not be transported. The refusal will be called in to Dispatch. If a passenger requests to wear a seat belt/shoulder harness loosely because of a disability, the driver must clear the request with Dispatch before moving the vehicle.

If at any time the driver is aware of a guest wearing the seat belt incorrectly or not at all, the driver will stop the vehicle when it is safe to do so. The vehicle will not resume the trip until all seat belts are properly secured. If none of the passengers will comply with the request to properly secure the seat belts, driver will notify Dispatch for further instructions.



Basic Driving Etiquette

Driving can be stressful, and at times can bring out rude behavior in otherwise calm, polite people. It doesn't have to be that way. As a Shuttle Express driver, your mission is much more than getting guests from point A to B, it's about maintaining professionalism, a level head, and courtesy toward others while doing it.

Courteous Driver Guidelines

- **Don't go too fast.** Follow speed limits. Not only will you risk an expensive speeding ticket if you drive too fast, but you'll also endanger all the lives in your path.
- **Don't go too slow.** Don't creep along too slowly on the highway. If the speed limit is 45 miles per hour, maintain that speed as closely as possible.
- **Heed conditions.** Several factors can make driving difficult, including weather, road construction, and heavy rush-hour traffic. When you're faced with blinding rain, don't go so quickly that you can't stop; be extra cautious when faced with a construction crew; don't honk your horn or weave in and out of traffic during rush-hour traffic, which only makes matters worse.
- **Stay in your lane.** Lanes are marked for a reason. Stay between the lines.
- **Don't be an indiscriminate lane changer.** Only change lanes when you have a reason, such as when turning or passing.
- **Drive with intention.** Don't drive along without a clue about where you are going. If you know you need to turn left soon, get in the left turn lane as quickly as possible.
- **Stay off the horn.** People who honk their horns to say "hi," punish other drivers, or because they like the sound, are annoying and even startling to other drivers.
- **Use your turn signal.** If you plan to turn, use your turn signal and make sure it's the correct one.
- **Only drive when sober.** If you have had anywhere near the illegal amount of alcohol for driving, don't get behind the wheel.
- **Be polite to law enforcement.** Whether you encounter a police officer directing traffic or you get pulled over, mind your manners and be respectful and polite.
- **Pull over for emergency vehicles.** If you see a flashing light or hear a siren, pull over and let the emergency vehicle pass. Someone's life may be at stake.
- **Avoid bad behavior.** Never respond to other people's rudeness with even more bad manners because once tempers flare, the situation may become dangerous.

What Not to Do While Driving

Doing any activity besides driving while you're behind the wheel is not only dangerous, it's rude. You are responsible for keeping your guests safe, protecting people in other vehicles, and following traffic laws and rules. Never ignore proper etiquette.

Common distractions that make driving dangerous and rude:

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- Never use your cell phone while driving—this includes talking and texting.
- Brush your hair before you get behind the wheel or wait until you can pull off the road.
- Applying makeup, such as mascara, while driving requires too much concentration. It's dangerous, and you risk poking yourself in the eye and causing an accident. Save the primping for later.
- Do not read while driving. Wait until you get where you're going.

Stop Sign Etiquette

When you see a stop sign, you should do just that—stop. The sign isn't a suggestion that you need to slow down or look both ways without stopping fully.

As you approach a stop sign, start applying your brakes soon enough so you can come to a complete stop before you get to the intersection. Look both ways. You may go once you are certain that you have enough time to get through the intersection before a car on the intersecting road gets there.

There are times when another vehicle coming toward you will reach the intersection at the same time. If both vehicles are going straight or turning right, you may do so simultaneously. However, if either of you has a blinker indicating that one of you is turning left, the one going straight has the right of way.

During heavy traffic, you may make eye contact with the other driver and gesture that he or she may turn left before you proceed. If the other driver does this for you, the courteous thing to do is lift a hand in a friendly greeting and mouth, "Thank you," before turning. If the other driver is rude and barges through, wait and let him/her go, even if he/she is on the wrong. There is no point in risking an accident just to make a point.

When you see a four-way or all-way stop sign, you may be confused about when it is okay to go. Traffic from every direction is required to come to a complete stop. Proper road etiquette dictates that the first vehicle to reach the intersection goes first.

If two vehicles reach the intersection at the exact same time, the one on the right has the right of way. In the case of four vehicles stopping at the intersection, move counterclockwise until everyone has gone. If all four vehicles come to a stop at the exact same time, generally one driver will be assertive and go first. Otherwise, make eye contact with the other drivers and wave someone through.

Defensive Driving Techniques

The Pre-trip Inspection

Always conduct a complete pre-trip inspection. Check vehicle gauges; ensure lights, signals, and windshield wipers are working; check tire pressure and tread; and perform a full walk-around inspection of the vehicle.

Seat belts

Always wear your seat belt and make sure all passengers wear their seat belts. Wearing a seat belt is the most important safety measure you can take to protect yourself in an accident.

Speed Limits

Follow the speed limit laws. However, in inclement weather such as rain, snow, or fog, the posted speed limit may not be safe. Slow down in inclement weather.



Following Distance

A van takes longer to stop than a smaller vehicle, and a bus takes even longer. Always allow a safe following distance between you and the vehicle in front of you. Increase the following distance in situations such as:

- Adverse weather conditions
- Heavy traffic
- Following a truck or bus
- Night driving or poor visibility
- When the driver behind you is tailgating
- Driving while stressed or fatigued

Blind Spots and Mirrors

Adjust mirrors before you start the vehicle and always be mindful of your blind spot.

Intersections

- When approaching an intersection, scan to the left, then to the right, and back to the left for vehicles that may run a stop sign/light.
- Watch for pedestrians and bicyclists.
- Anticipate what mistakes others may make and assume that they will make them.

Passing

- When passing, pull out into the oncoming lane and quickly accelerate but do not exceed the speed limit.
- Pull back into the lane when you can see the vehicle you passed in the mirror.
- When passing a truck or bus, increase the distance before pulling back into your lane until you can see truck or bus in the mirror.

Adverse Weather Driving

- Be extra careful when driving in adverse weather conditions.
- Keep windows clear of ice, snow, and fog.
- Always leave yourself an "out" regarding direction
- Remember that shaded road areas, bridges, and overpasses may be icy.

Distracted Driving

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- Distracted driving results in 1.4 million accidents each year.
- Do not use cellphones, laptops, or tablets when driving when the vehicle is in motion.
- Pull over if you need to contact Dispatch or a guest.
- Driving when tired increases poor judgement.

Safe Backing

- Avoid backing up.
- If you must back up, walk around the vehicle before getting into the vehicle to make sure there is nothing in the way before backing.
- Always back up slowly and carefully.

General Do's and Don'ts of Safe Driving

Safe driving is always the best policy. Below are more tips and techniques for driving behaviors to help you avoid getting a ticket or getting in an accident.

The Do's

- Review the official rules of the road for your jurisdiction periodically, and follow them always.
- Obey the speed limits.
- Pay attention when you are driving, even if you are familiar with the area. A surprising number of accidents happen only blocks from work or home!
- Be courteous toward other drivers.
- Give pedestrians the right-of-way in crosswalks.
- Make room for bicycles.
- Keep a winter survival kit in your vehicle for bad weather conditions. A good survival kit should contain a cell phone, matches, flares, a working flashlight, food, water, and blankets.
- Be aware and mindful of other drivers.
- Stop completely at stop signs and red lights.
- Check your mirrors frequently.

The Don'ts

- Avoid drinking alcohol or taking drugs.
- Never make assumptions about what other drivers are going to do. Just because someone has their turn signal on does not mean they are actually going to turn. They may be like the rest of us and have forgotten the signal is on.



- Never assume that other vehicles know what you are doing, either. Make sure that you use your turn signals and give yourself, and the cars around you, plenty of room to maneuver.
- Avoid tailgating other vehicles, passing on shoulders, failing to yield, running stoplights or stop signs (even if no one else seems to be around), or breaking any other rules of the road on purpose. If you act like you are above the law when you operate a vehicle, you will sooner, rather than later, find out that you are not.
- Avoid playing the vehicle stereo so loudly that you are disruptive to others, or so loudly that you are unable to hear train signals or emergency vehicle sirens.
- Never talk on your cell phone and drive at the same time. If you need to make or answer a telephone call while you are driving, pull over at a safe place, use the phone, and then resume your journey.
- Don't engage in other activities while driving that distract your attention or reduce your reaction time. Eating, changing clothes, or putting on makeup while driving is dangerous. In some states, if you are caught doing these things while driving you can be cited for "driver inattention" and given a ticket.
- Never treat a vehicle like it is a toy. It is not. Don't use a vehicle to play chicken, race, or give another vehicle a friendly "tap."
- Never let your emotions and frustrations get the best of you. Don't engage in road rage, no matter how irritating another driver might be to you.
- Avoid leaving valuables in the vehicle, especially in places where they can be seen, no matter where you are parked.



Coach Driver Charter Procedures

Coach drivers are to adhere to the following procedures when providing charter service to our private service groups. These actions will help ensure guest safety, create a positive guest experience, and reduce liability and risk.

Procedures

- Dress professionally in accordance with Shuttle Express standards.
- Complete thorough vehicle pre-trip inspection each day before guests arrive.
- Check and monitor fuel usage and allow time to fuel vehicle prior to departure.
- Inspect and ensure vehicle interior is completely cleaned before guests' board vehicle.
- Empty trash.
- Check the vehicle floor and under the seats.
- Professionally greet guests and provide general guidelines regarding travel.
- Clarify itinerary to make sure it is correct.
- Build rapport with client-designated point person for the trip.
- Communicate vehicle safety standards to the guests on first day and verbally remind each day before driving (if it's a multi-day trip).
- Request that guests grip handrail when boarding and exiting coach.
- Make sure all guests remain seated when the coach is moving.
- Ask guests to keep feet and luggage from blocking the aisle.
- Tell guests that the primary exit is the front door.
- Point out all emergency exits, including windows and the roof top.
- Point out the fire extinguisher's location and how to use it.
- Request no standing or walking around while vehicle is in motion.
- Review emergency procedures and protocol.
- Keep guests informed of itinerary throughout the trip, including departure and estimated arrival times.
- Contact Dispatch one hour before departure each day of trip, if a multiple day charter.
- Contact Dispatch upon reaching destination each day, review travel activity, and next day itinerary for clear understanding.
- Contact Dispatch and report any mechanical concerns.

EMERGENCY PROCEDURES

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Escalation Procedure

Following the Escalation Procedure ensures a correct and timely response by Dispatch in case of vehicle breakdowns or service interruptions for charter work. When an incident happens, the driver will contact Dispatch at extension 7037 or 7035 immediately after the service interruption and when they can safely make contact.

The driver will provide the following information:

- Driver name, vehicle number, and contact phone number
- Any injuries and/or potential safety issues
- Vehicle location
- Number of guests onboard
- Detailed description of the breakdown and severity of the situation

Dispatch will gather information and assess next steps in the following order:

1. Immediately notify the Director of Field Operations (DOFO) at (206) 406-5262 and/or Vehicle Maintenance at extension 7001 or 7090.
2. Vehicle Maintenance will advise Dispatch if the vehicle can be repaired on site; Driver may be consulted to make this determination.
3. Length of time required if Maintenance can repair vehicle at location and amount of time before a rescue vehicle(s) can arrive at location. The shorter will be selected.

Dispatch will follow Snoqualmie protocol in addition to these procedures if the breakdown and/or major service delay involves a Snoqualmie coach.

If the vehicle is not repaired on site, Dispatch will send a rescue vehicle(s), determined in order of the following:

1. Vehicles currently on the road with similar seating capacity that can be reassigned.
2. Multiple vehicles currently on the road with less seating capacity that can be reassigned.
3. Vehicles not on the road with similar seating capacity and an available driver who can be assigned.
4. Multiple vehicles not road with less seating capacity and available drivers who can be assigned.
5. If SE cannot support the rescue, contact an outside vendor from approved list.

Communications during recovery:

- Dispatch will inform driver of recovery plan and provide updates at a minimum of every 15 minutes, including what to advise the guests on-board.
- Dispatch will document the situation on the reservation and provide a complete, detailed synopsis on the shift dispatch operations report.

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- Dispatch will make a follow-up call and/or text message to Director of Service Operations (DOSO) and Director of Resource Optimization (DORO) once everything is back to normal operational service status.
- Dispatch will inform DOSO, Director of Sales/Marketing (DOSM), and DORO in addition to the primary salesperson responsible for the account. Salesperson will appropriately discuss the situation with the client contact and keep client fully informed of the recovery activity until final resolution is achieved.
- Driver will keep guests calm and informed of the recovery plan every 15 minutes as information is provided from Dispatch. Driver is not to leave the location unless directed by Dispatch.
- DOSO and/or DORO will provide on-going updates to DOSM and will continuously follow up until final resolution.

f. How will the company maintain records in general?

Shuttle Express maintains records through various software applications; GroundWigets, JJ-Keller, Paper Port Professional and hard copy files.

g. How will the company be able to demonstrate to the commission which vehicle is being operated at any time and when?

The GroudWigets software has a built in fleet manager within the dispatch module which allows Shuttle Express dispatchers to observe vehicle locations through trip start to end.



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION
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March 12, 2018

Jimmy M Sherrell, President
Shuttle Express, Inc.
800 SW 16th St
Renton, Washington 98057

RE: Order 20, Final Order
Docket TC-143691 – Application for Auto Transportation Authority

Dear Mr. Sherrell:

Order 20 (Final Order) issued November 17, 2017, in docket TC-143691 required Shuttle Express, Inc. (Shuttle Express or company) to make a compliance filing by February 15, 2018, subsequently extended to March 19, 2018. The company submitted its response on March 6, 2018, titled Comprehensive Compliance Plan Letter.

Commission Staff reviewed the company's compliance plan and believes the plan does not adequately address the company's long standing history of non-compliance with the commission. The plan should explain why the violations occurred and how the company will prevent them from happening in the future. Please provide more detail by responding to the questions below. Each response should address company employee drivers as well as contract drivers, and company owned vehicles as well as contract vehicles.

1. Please elaborate on driver safety, qualifications, and training as follows:
 - a. How will company ensure adequate driver training?
 - b. Who will provide the training?
 - c. Is there refresher training?
 - d. How will the company manage drug and alcohol testing?
 - e. How will the company manage hours of service requirements?
 - f. Describe company protocol for when an accident occurs

Respect. Professionalism. Integrity. Accountability.

2. Please elaborate on vehicle safety, inspection, repair, and maintenance as follows:

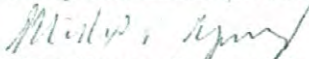
- a. How will the company complete annual vehicle inspections?
- b. How will the company maintain vehicle records of inspections, repairs, and maintenance?
- c. How will the company ensure use of proper safety equipment?
- d. How will the company ensure safe operating procedures?
- e. How will the company ensure passenger safety?
- f. How will the company maintain records in general?
- g. How will the company be able to demonstrate to the commission which vehicle is being operated at any given time and when?

Providing this information will enable Staff to make a recommendation to the commission that the company has complied with Order 20 as directed in that order. If you have any questions please do not hesitate to contact us.

Sincerely,



Mat Perkinson, Motor Carrier Safety Manager
Safety and Consumer Protection Division



Mike Young, Section Manager
Water and Transportation Section