

**Draft Auto Transportation Rules-Chapter 480-30-WAC
Docket TC-121328**

June 19, 2013

The following comments are submitted by Bremerton-Kitsap Airporter, Inc. and are intended to clarify our previous comments concerning the 2nd Draft Rules submitted on April 12, 2013.

WAC 480-30-096 Certificates, application filings, general

The rule requires applicants to state that the proposed service will be either “door to door” service, “scheduled service” or both. We want to emphasize the apparent non-usage of door to door service for communities in a rural setting. In August 2012 BKA, Inc. purchased a Lincoln Town Car specifically to offer door to door service for up to three passengers. Although the additional service was advertised on the web page, brochures and on signs posted in each of our vans and busses, the Town Car has been utilized only twice (early December 2012) since the vehicle was purchased. Our charter authority offers door to door service for parties up to 24 passengers and its usage is very limited as well.

It is likely that a prospective applicant would propose to offer both door to door service and scheduled service claiming at a hearing that if scheduled service is “good”, then both scheduled and door to door service is “better”. If the authority is granted, then in our opinion, both the proposed and existing scheduled services are in jeopardy resulting in reduced service, increased fares or both. Close evaluation by the Commission will be needed.

Respectfully submitted:

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