

Washington Utilities and Transportation Commission
David Danner
Executive Director and Secretary
1300 Evergreen Pk Dr SW
Olympia, WA 98504

Pacific NW Transportation Services, Inc.
d/b/a Capital Aeroporter
James N. Fricke, President
PO Box 2163
Olympia, WA 98507

October 8, 2012

RE: Docket TC – 121328, Comments on Proposed Legislation

To Whom It May Concern,

The concept of banded rates is laudable and a move in the right direction to establish flexible, reasonable fares to the traveling public. “Reasonable” fares then are related to cost to the customer for Auto Transportation relative to other transportation services in the market place rather than being defined in the inflexible control of certificate holder gross profit.

The band rate approach has precedence in statute. The banded rate approach would save many hours on “rate” cases and fuel surcharge filings.

The untenable condition provisions must all be removed, because limited entry is better retained at the state level; the rule as proposed allows unlimited entry and little recourse in destabilizing the door-to-door shared-ride van industry (for which is 93/7 ratio has never recognized the greater risk) and does not maintain protection for a company who does not opt to banded rates when a 2nd company does opt.

Flexible rates within a band with limited entry, protects the travelling public with genuine, market-based reasonable rates.

Respectively,

James N. Fricke
President
Capital Aeroporter Airport Shuttle