

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of a Penalty Assessment Against	DOCKET TE-260080
SEATTLE TRAVEL SERVICE, LLC	ORDER 01
in the amount of \$3,700	GRANTING MITIGATION IN PART; APPROVING PAYMENT PLAN

**BACKGROUND**

- 1 On February 23, 2026, the Washington Utilities and Transportation Commission (Commission) issued a penalty assessment against Seattle Travel Service, LLC (Seattle Travel Service or Company) in the amount of \$3,700 for violations of Washington Administrative Code (WAC) 480-30-191, Bodily Injury and Property Damage Liability Insurance and WAC 480-30-221, Vehicle and Driver Safety Requirements, which adopts Title 49 Code of Federal Regulations (49 C.F.R.) Part 391 – Qualification of Drivers. The Penalty Assessment includes:
  - a penalty of \$100 for each occurrence (three) of WAC 480-30-191 for operating a passenger carrying vehicle without having in effect the required minimum levels of financial responsibility for a total of \$300.
  - a penalty of \$100 for each occurrence (34) violations of 49 C.F.R. § 391.45(a) for using a driver not medically examined and certified for a total of \$3,400.
- 2 On February 25, 2026, Seattle Travel Service filed a response to the Penalty Assessment admitting the violations and requesting mitigation of the penalty amount (Application). In its Application, the Company acknowledged the violations, states that the violations were unintentional, indicated that it took immediate corrective action regarding the violations identified by Commission staff (Staff), provided a copy of a valid medical certificate for driver Sui Min Liang, and requests reduction of the penalty amount because it would create a financial hardship for the Company.

- 3 On February 27, 2026, Staff filed a response recommending the Commission grant the Company’s Application, in part. Staff also recommends that the Commission reduce the \$3,700 penalty to \$2,000 as well as approve the following proposed payment plan, which has been mutually agreed upon by Staff and Seattle Travel Service:

Payment Plan		
Installment	Due Date	Amount
1	March 16, 2026	\$200
2	April 15, 2026	\$200
3	May 15, 2025	\$200
4	June 15, 2026	\$200
5	July 15, 2026	\$200
6	August 17, 2026	\$200
7	September 15, 2026	\$200
8	October 15, 2026	\$200
9	November 16, 2026	\$200
10	December 15, 2026	\$200

Seattle Travel Service is aware that if it fails to pay any installment by the due date, the entire remaining balance will immediately become due and payable without further Commission order.

**DISCUSSION AND DECISION**

- 4 Washington law requires charter and excursion carriers to comply with federal safety requirements and undergo routine safety inspections. In some cases, Commission requirements are so fundamental to safe operations that the Commission will issue penalties for first-time violations.<sup>1</sup> Violations defined by federal law as “acute” or “critical” meet this standard.<sup>2</sup>
- 5 Violations are considered “acute” when non-compliance is so severe that immediate corrective action is required regardless of the overall safety posture of the company. Violations classified as “critical” are indicative of a breakdown in a carrier’s management controls. Acute violations discovered during safety inspections are subject to penalties of

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<sup>1</sup> Docket A-120061, Enforcement Policy for the Washington Utilities and Transportation Commission ¶12 (Jan. 7, 2013) (Enforcement Policy).

<sup>2</sup> 49 C.F.R. § 385, Appendix B.

\$1,500 per violation,<sup>3</sup> and critical violations are subject to penalties of \$100 per violation.<sup>4</sup>

6 The Commission considers several factors when entertaining a request for mitigation, including whether a company introduces new information that may not have been considered in setting the assessed penalty amount or explains other circumstances that convince the Commission that a lesser penalty will be equally or more effective in ensuring a company's compliance.<sup>5</sup> We address each violation category below.

7 **WAC 480-30-191.** The Penalty Assessment includes a \$300 penalty for three violations of WAC 480-30-191 for operating a passenger carrying vehicle without having in effect the required minimum levels of financial responsibility. Staff informed the Commission that the Company did not address these violations in its Application. Therefore, Staff recommends no mitigation of this portion of the penalty.

8 We agree with Staff. Seattle Travel Service did not address these violations in its Application. Accordingly, we decline to mitigate this portion of the penalty.

9 **49 C.F.R. § 391.45(a).** The Penalty Assessment includes a \$3,400 penalty for 34 violations of 49 C.F.R. § 391.45(a) for using a driver not medically examined and certified when it allowed driver Sui Min Liang to operate a motor vehicle without a valid medical certificate on 34 occasions between December 18, 2025, and January 20, 2026. Seattle Travel Service states that there was a delay in the issuance of the driver's medical certificate due to waiting for a response from the driver's physician. The Company further states that it understands the driver should not have operated without being medically certified, and that the Company has established procedures to prevent future violations. Staff recommends that the \$3,400 penalty for these first-time critical-type violations be mitigated to \$1,700.

10 We agree with Staff and mitigate this portion of the penalty to \$1,700.

### FINDINGS AND CONCLUSIONS

11 (1) The Commission is an agency of the state of Washington, vested by statute with authority to regulate rates, rules, regulations, and practices of public service

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<sup>3</sup> See RCW 81.04.530.

<sup>4</sup> See RCW 81.04.405.

<sup>5</sup> Enforcement Policy ¶ 19.

companies, including passenger transportation companies, and has jurisdiction over the parties and subject matter of this proceeding.

- 12 (2) Seattle Travel Service is a passenger transportation company subject to Commission regulation.
- 13 (3) Seattle Travel Service committed three violations of WAC 480-30-191 by operating a passenger carrying vehicle without having in effect the required minimum levels of financial responsibility.
- 14 (4) The Commission should penalize Seattle Travel Service \$300 for three violations of WAC 480-30-191.
- 15 (5) Seattle Travel Service committed 34 violations of 49 C.F.R. § 391.45(a) by using a driver not medically examined and certified on 34 occasions between December 18, 2025, and January 20, 2026.
- 16 (6) The Commission should penalize Seattle Travel Service \$1,700 for 34 violations of 49 C.F.R. § 391.45(a).
- 17 (7) Seattle Travel Service should pay the mitigated penalty balance per the payment plan identified in paragraph 3.

### ORDER

#### THE COMMISSION ORDERS:

- 18 (1) Seattle Travel Service, LLC's request for mitigation of the \$3,700 penalty is GRANTED, in part, and the penalty is reduced to \$2,000.
- 19 (2) The proposed payment plan is approved. If Seattle Travel Service, LLC fails to fails to pay any installment by the due date, the entire unpaid portion of the \$2,000 penalty will become immediately due and payable without further Commission order.
- 20 The Secretary has been delegated authority to enter this order on behalf of the Commissioners under WAC 480-07-903(2)(e).

DATED at Lacey, Washington, and effective March 3, 2026.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

A handwritten signature in black ink that reads "Jeff Killip". The signature is written in a cursive, flowing style.

JEFF KILLIP

Executive Director and Secretary

**NOTICE TO PARTIES: This is an order delegated to the Executive Secretary for decision. As authorized in WAC 480-07-904(3), you must file any request for Commission review of this order no later than 14 days after the date the decision is posted on the Commission's website.**