

January 27, 2017

To whom it may concern,

My name is Danette Stoner and I am the owner and operator of Pacific NorthWest Distributing LLC. Thank you for providing me to opportunity to submit comments on TC-161262, this impacts me directly as a multiple certificate holder.

1. WAC 480-30-213 requires that a passenger transportation certificate holder own or lease vehicles operated under authority of its certificate and that only the certificate holder or the certificate holder's employees operate the vehicles.

a.

My company, Pacific NorthWest Distributing LLC (DBA Vashon Shuttle), owns multiple certificates and is impacted by regulations from the UTC in many ways TNCs are not. Owning every vehicle used is prohibitive to keep up with what customers need in different situations.

b.

Removing the ownership requirements for Airport shuttles and other ground transportation would make them uninsurable as businesses, so anything but holding TNCs to the same standard of ownership would not be fair or feasible.

c.

TNCs have no corporate responsibility or liability for any vehicle that is operated for their company when they use a web of insufficient personal insurance for commercial use. This is a disaster for consumers who have no recourse to be compensated fairly for accidents injuring themselves or damaging personal property.

If the commission were to take our suggestions, they would be holding TNCs to the same standards as any other comparable commercial vehicle and increasing public safety with these common sense accountability requirements.

d. If auto transportation companies were allowed to provide regulated service using vehicles they do not own or lease, or use drivers other than the certificate holder or employees,

i.

There currently is no adequate insurance that offers commiserate coverage to individuals, without a company making every driver a partner in the company.

ii.

I don't see a feasible system to oversee such lax standards with so many new factors. It would require the UTC to spot check every vehicle operating commercially at the airport and confirm insurance status with the individual drivers at every transportation company.

2. WAC 480-30-221 and WAC 480-30-999 require that a passenger transportation certificate holder comply with specified provisions in the code of federal regulations (CFRs).

a.

As an airport shuttle those WACs are very reasonable and attainable precautions we are happy to adhere to.

The current requirements for yearly vehicle inspections and access to vehicle maintenance logs are measures of accountability that are reasonable precaution for the safety of our passengers using any form of transportation.

b.

TNCs are not required to provide logs or undergo vehicle inspections with the same rigor as commiserate services like Taxis is unfair and undermines public safety.

TNCs should be held to the same standards for vehicle inspection as Taxis. Including the same rigor/frequency of inspection.

c.

TNCs would take responsibility and comparable liability for any vehicle that is in unsafe condition but driven for their commercial use.

TNCs would protect consumers who have had no recourse to be compensated fairly for accidents injuring themselves or damaging personal property.

3. The Commission has established other state regulations regarding safety, insurance, and consumer protection, specifically WAC 480-30 Part 4 (WAC 480-30-191 through 201), Part

a.

Our company is held to a reasonable standard of accountability for our drivers, that TNC parent companies are not, through commercial insurance. Our current insurance requirements protect consumers if an accident occurs.

b.

The TNCs (Uber, Lyft, etc) need to provide form F or equivalent commercial insurance to all drivers or their drivers.

c.

The same protections consumers would have for financial compensation if our company ever had a major accident through our commercial insurance. If a company has a wreck or destroys customer property they are entitled to more than the state minimum requirements for individual drivers.

4. The Department of Licensing, Washington State Patrol and some local governments have adopted regulations for the passenger transportation providers they regulate.

a.

I'm honestly not sure how or if those entities have a significant regulatory impact on my business.

b.

See above.