

**BREMERTON-KITSAP AIRPORTER, INC.**  
**PO Box 1255, Port Orchard, WA 98366**  
**(360) 876-1737 – Fax (360) 876-5521**  
**www.kitsapairporter.com**

February 27, 2017

Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

Subject: Written Comments concerning Docket TC-161262 re: Modifications to WAC 480-30.

Dear Sir,

On May 1, 2016 Bremerton-Kitsap Airporter, Inc. discontinued reduced rates for Military personnel on active duty and all Senior Citizens' over age 65. This was done because of the difficulties and time encountered in administering these special rates. We anticipate additional difficulties in the administration of these new Service Animal regulations. For instance, how is the operator to ascertain the differences of a Service Animal, Comfort Animal, Therapy Animal or a family pet? An article appeared in the Kitsap Sun today about a man in Washington who claimed his small horse to be a Service Animal. I am certain that none of our vehicle seats are large enough to accommodate a horse! Asinine regulations must be eliminated!

As an Auto Transportation Company authorized to operate fixed route services to and from SeaTac Airport (C-903), and as a "convenience" to air travelers' transportation needs, would we then be permitted to deny transportation for any animals on our vans and busses?

Bremerton-Kitsap Airporter (BKA) and other auto transportation services that operate similar sized vehicles simply do not have the means to safely and easily transport animals. Kenneled animals cannot be transported (1) in our busses unventilated baggage compartment with no climate control, (2) it is not possible to lay at the feet of their master when there is scarcely room for the master's feet, (3) they are not permitted to lay or stand in the aisle, just like passengers for safety reasons, (we have already been fined) and finally, (4) invariably, someone will bring legal action because of allergies to pet dander if the animals are permitted to occupy a passenger seat.

During at least 5-6 daily trips our vans and busses are filled to capacity and there is no space available for additional baggage, let alone an animal of any size. This means then, that during these trips all seats are generally sold at the adult fare. Since we are a privately owned auto transportation company, we are in the business of selling seats to passengers unlike publicly owned transportation activities obligated to provide "essential" services. We are not willing to offer these seats to a service animal, free of charge.

Therefore we propose the following paragraph be added to our tariff:

“Effective May 1, 2017, for reasons of health and safety, no animals will be transported on BKA vehicles during scheduled operations. Animals will, however be transported in prearranged BKA chartered vans and busses, offering door-to-door service, and at a 10% reduction in rates”.

Sincerely,

*Richard E. Asche*

Richard E. Asche  
President