

# *Whidbey-SeaTac Shuttle*

May 13, 2005

Ms. Carol Washburn  
Executive Secretary  
Washington Utilities and Transportation Commission  
1300 S Evergreen Park DR SW  
PO Box 47259  
Olympia, WA 98504-7250

**Re: DOCKET NO. A-042090  
ORDER NO. 02**

Dear Ms. Washburn:

I am in receipt of above captioned Order regarding fuel surcharges. While I am grateful that the commission has quantified the methodology for calculating fuel surcharges, I am discouraged that such a simple process has been overly complicated to the point of being unworkable. It was the commission's stated intent through this Order to "streamline the process". While this Order may prevent future occurrences of arbitrary and capricious application of an unwritten policy, it has done little or nothing to streamline the process for the regulated.

As presented, I see the methodology as unworkable. Our President, Mr. Solin, holds a Masters degree in finance from UCLA and is at a complete loss as how to formulate our future surcharge requests. It must have taken many staff hours to develop such a convoluted process for such a simple operation.

Let me offer a simple, clear cut solution for this constantly reoccurring problem:

If the current per gallon fuel price exceeds the base year average per gallon fuel price, then the amount by which the base year per gallon cost is exceeded would be multiplied by the number of gallons purchased in the month preceding the surcharge request and then divided by the number of one way equivalent passengers carried during that same preceding month.

By way of example I offer the following hypothetical case:

**May 2005** Surcharge request filing

Base year average fuel cost per gallon (gross)	\$1.75
Most recent fuel invoice cost per gallon	\$2.55
Difference between base and current cost	\$0.80
Number of gallons purchased in <b>April 2005</b>	2500 gal
Total excess cost      2500gal X \$0.80	\$2000
Number of equivalent one way passengers during <b>April 2005</b>	4476
Per person surcharge gross \$2000 / 4476 pax	\$0.45
Rounded to nearest \$0.25	\$0.50 per one way fare

There is no reason what-so-ever to have to use 23 line items as now required. They are just wasteful, meaningless calculations that serve no purpose except generate excess paper work and cost us more in lost time. The above example offers a clear, concise, fair, understandable, justifiable and **STREAMLINED** methodology that would reduce not only our workload (and therefore expense passed onto the consumer through rate increases) but also that of staff who now waste hours reviewing these overly burdensome submissions.

I ask that you and or the commission review these suggestions with Messrs. Eckhardt and Colbo. I know that I for one would be very interested to hear their justification for the process required by Order No. 2.

Sincerely,

Michael Lauver  
VP / GM

cc: WUTC

Wash. Airporter Operators Assoc.

Chairman Sidran  
Commissioner Oshie  
Commissioner Jones  
Glenn Blackmon

Richard Asche  
Larry Wickkiser  
Jim Fricke  
Jimmy Sherrrell  
David Gudgel  
John Solin

Bremerton Kitsap  
Wickkser International  
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