

From: mikelauver@gmail.com [mailto:mikelauver@gmail.com] **On Behalf Of** Mike Lauver
Sent: Sunday, October 20, 2013 9:48 PM
To: King, Steve (UTC); Richard Johnson; reasche@aol.com; John Solin; Catherine Taliaferro/WUTC@WUTC; jimf@capair.com; ssalins@shuttleexpress.net
Subject: ancillary charges information

Seatac Shuttle, LLC

October 18, 2013

Re: Flexible fares for ancillary charges;
Docket TC-121328

Dear Director King:

Thank you for your letter of October 15 regarding treatment of ancillary charges under 480-30-420. I had a recent conversation with Ann Randahl regarding this subject at which time I expressed this company's willingness to accept the proposed interpretation as long as there was accompanying clarity. I view your letter as a step forward in providing this clarity; however, in reviewing your letter two additional questions arise. To minimize future possible differing interpretations we ask that you provide additional guidance on these issues.

1) Our tariff reflecting flexible fares has been approved by the commission. Contained within it are specific ancillary charges, your letter seems to suggest that we must now file an additional tariff revision with 30 day public notice to bring these charges under the -420 rule. We do not share this interpretation and view it as an unnecessary redundancy; would you please provide the basis for your position if in fact I have characterized it correctly.

2) Second, while in rule "baggage charges" is used as an example of an excluded ancillary charge, the commission does not regulate baggage and therefore this example, if you intend it to be included under the -420 rule, is in error. I agree that it is an excluded ancillary charge but we disagree that it is subject to the flexible fare rule. Again we seek further clarification.

Thank you in advance for any guidance you can provide on these questions. I feel strongly that if these questions are resolved as they present themselves during the early stages of implementation of the revised rule the overall process for all of the operators as well as for your staff will be much smoother.

Regards,

Michael Lauver
Seatac Shuttle, LLC

