

**BREMERTON-KITSAP AIRPORTER, INC.**  
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March 22, 2006

Washington Utilities and  
Transportation Commission  
1300 S. Evergreen Park Drive SW  
Olympia, WA 98504

Att'n: Penny Hansen

Dear Penny,

Re: Docket TC-060177

I regret that I will be unable to attend the Workshop set for April 4, 2006 to discuss rulemaking to consider rules relating to rate regulation for Passenger Transportation Companies, Chapter 480-30-WAC. A prior commitment will have me in attendance at the semi-annual Airport Ground Transportation Association conference in San Francisco.

I wish to comment in writing and express my concurrence, in principle, with the comments of Seatac Shuttle, LLC d/b/a Whidbey-Seatac Shuttle, already on record and filed on March 15, 2006.

Of particular concern is the necessity to establish consistent rules and standards for determining fair, just, reasonable and sufficient fares rather than relying on a vague Commission policy that is not in writing and seems to change from time to time.

Also of concern is the tying of fares to the profitability of the carrier. In theory, in a monopoly, the higher the fares the greater the profits. However, Auto Transportation Companies are not monopolies as there are many choices air travelers have in traveling to or from the airport. I'm certain that commission staff members, and perhaps the Commissioners themselves, most of the time do not utilize airporter services.

Moreover, gasoline surcharge calculations require overhaul. Although gasoline costs have increased substantially in the past year or so (and they are expected to climb further), under the current system "Commission policy" dictates that operators must

absorb part of the additional costs. Currently, one percent is deducted from the fuel increase as a percentage of revenue. This is unfair.

Finally, it is recommended that operator fares be set by the operator within a 20% band of current fares existing on January 1, 2006 as proposed by Seatac Shuttle.

Sincerely,

Richard E. Asche  
President