

Triangle Charter Service, LLC

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September 21, 2015

Ms. Suzanne Stillwell
Licensing Services Manager
Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504

Re: Docket TE-151866 Petition to request an exemption from the Utilities and Transportation Commission's insurance requirements,

Dear Ms. Stillwell,

This letter is in response to your email of September 21, 2015 requesting additional information regarding Triangle Charter Services LLC's original letter of petition for an exemption under rule: WAC 480-07(110) sent to the Utilities and Transportation Commission dated September 17, 2015.

Triangle Charter Services LLC is asking for an exemption to WAC 480-07 (110) to accept Prime Insurance Company, as an unauthorized company not listed with the WUTC as our provider of Auto Liability insurance. Prime Insurance Company was added to the Surplus Lines Association of Washington in 2008 as an acceptable unauthorized carrier for filing purposes with the NAIC number 12588 (see attached letter).

This exemption to WAC 480-07 (110) is being requested by Triangle Charter Services LLC after our most recent insurer, RLI Insurance declined to offer terms for our renewal effective August 25, 2015; and after exhausting all possible avenues to procure auto liability insurance elsewhere through all known WUTC authorized insurance companies (National Interstate, National Indemnity, Scottsdale, Lancer, Occidental, AIG and XL). The reason cited for these authorized companies to decline coverage was due to loss frequency and a safety compliance issue with the FMCSA. Triangle Charter Services feels these declinations are not warranted or justified

Triangle Charter Services' five year loss ratio prior to a recent secondary reserve set on 8/5/2014 loss was 43.3%. Including the recent \$43,500 on the secondary reserve, our Five Year Loss Ratio is 62.5%. After extensive efforts to address recent claim activity, Triangle Charter Services has contracted with consultants: Barry Lewis from United States Transit Funding, Inc. and Gary Hahn and Associates (Risk Management and Safety Consultant) to make measurable steps to improve safety and training. It has also resulted in the termination of several long time drivers and new safety, maintenance and training policies. **Since these actions have been taken there have been no losses in over a year.**

Enclosed with this letter is our supporting claim report documentation from RLI Insurance, our recent Safer Report, a copy of our US Department of Transportation Rating of "Satisfactory" dated February 23, 2015, and a Letter of Compliance Review and Consulting Agreement with Gary Hahn & Associates (Safety and Risk Management Consultants).

In closing, Triangle Charter Services LLC's survival as a tour bus operator and the livelihood of its owner and employees is dependent upon the WUTC's reasonableness to accept our petition to be exempt WAC 480-07 (110) rule requiring authorized insurance company and allowing us to provide the necessary \$5,000,000 Auto Liability Limits with Prime Insurance Company (AM Best Rating of A- VI "Excellent").

Sincerely,

Mr. Dan Wilder
President
Triangle Charter Services LLC