



Paul Kajanoff, President  
Shuttle Express, Inc. – C-975  
800 SW 16<sup>th</sup> Street  
Renton, WA 98057

Friday, September 11, 2015

To Whom It May Concern:

Shuttle Express, Inc. wishes to provide comments on docket TE-151080 in response to the proposed rulemaking changes regarding "Party Bus" regulations. Comments are submitted as an attachment to this letter and outlined in respect to the section, paragraph, and suggested changes in this rulemaking proposal.

Please feel free to contact Shuttle Express by email with the contact information below if there are any questions or requested follow-up to our submission.

Contact:

Wesley Marks, Accounting Manager  
Email: [wmarks@shuttleexpress.net](mailto:wmarks@shuttleexpress.net)  
Fax: 425-981-7071

Regards,

A handwritten signature in black ink, appearing to read "Paul Kajanoff", written over a white background.

Paul Kajanoff, President  
Shuttle Express, Inc.  
P: 425-981-7070

Response to Draft Rules in Docket TE-151080 dated August 12th, 2015

Shuttle Express, Inc.

C-975, CH-0171

Comments dated Friday, September 11th, 2015

| Citation   | Title   | Response   |
|------------|---|--|
| 480-30-011 | Exempt Operations                                   | Shuttle Express has no objection or comments to the changes in this section.   |
| 480-30-036 | Definitions, general                                | Shuttle Express has no objection or comments to the changes in this section.   |
| 480-30-076 | Regulatory fees                                     | Shuttle Express has no objection or comments to the changes in this section.   |
| 480-30-086 | Certificates, general                               | Shuttle Express recommends that (2)(b) be amended to include the definitions included in 480-30-246 (2)(a) to include "...includes advertising or soliciting, offering or entering into an agreement to provide such service."   |
| 480-30-216 | Operation of motor vehicles, general                | Shuttle Express has no objection or comments to the changes in this section.   |
| 480-30-246 | Sanctions for operating without a valid certificate | Shuttle Express objects to the difference in definition in this section between "(1) Operating without a certificate - auto transportation companies" and "(2) Operating without a certificate - charter and excursion service carriers". While both classes of operators are regulated by the Commission, the standard of their operations is being defined differently. We believe that auto transportation companies and charter and excursion carriers should be held to the same standard of engagement as is defined in (2)(a) - "...includes advertising or soliciting, offering or entering into an agreement to provide such service." Under this rule change, uncertificated operators may advertise their business as an auto transportation company, but is not subject to any action or sanctions until the company is observed or reported to have actually performed the service. Conversely, an uncertificated charter operator under the new rules can be sanctioned simply by advertising or soliciting charter services without ever actually performing the said service. Both of these operator types are regulated under the same chapters of RCW and WAC, and as such we feel that their standards for sanctions should be identical. Additionally, sections (3), (4), and (5) should also be unified in their definitions of "Operations" in WAC 480-30-086 as proposed in the comments above. We recommend the stricter definition of operations and engaging in the business as defined in the comments above. |
| 480-30-XXX | Liquor Permit Required                              | Shuttle Express has no objection or comments to the changes in this section.   |