



December 11, 2019

Mark L. Johnson, Executive Secretary  
Washington Utilities and Transportation Commission  
1300 S Evergreen Park Drive SW  
Olympia, WA -7250

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COMMISSION

As requested in the Washington State Utilities and Transportation Commission letter of November 7, 2019, The Rock Transportation Services Corp. dba Whidbey SeaTac Shuttle & Charter C-1077 is pleased to provide the response to Docket TC-190898.

1. Have the amendments increased opportunities to maintain and expand safe, fair, adequate, dependable and fairly priced auto transportation service to the public?

The flexible fares have given us the opportunity to keep up with the dramatic changes in the transportation environment we have seen over the last six years. While maintaining a modern dependable fleet and keeping our fares at a competitive rate.

2. Have the amendments reduced the cost of complying with tariff changes and compliance with regulation?

Yes, greatly. We are no longer burdened with the repeated filings for fuel and port surcharges thus reducing employee time to generate, file and complete follow-up. It has also reduced the cost we incur with each fare fluctuation which required updates to our website and printed materials. This has provided us the ability to pass cost savings on our customers.

3. Have the amendments reduced the duration of time required to process tariffs?

Yes, we have noticed a faster turn-around time through the UTC when requesting information or filing changes.

4. Have the amendments increased opportunities for new and existing companies to provide service?

Yes, new service providers entering the marketplace providing similar services to ours. We have been able expand our service to SeaTac International Airport from Whidbey Island and Paine Field.

5. Has there been an increase in consumer complaints about unreasonable or unfair fares?

No, and in fact we have witnessed a decline in complaints and questions about fares since we can publish and inform customers in a timely and accurate manner of the fare(s) they will pay.

6. Have the changes resulted in an increase in ridership?

Yes, we have seen a steady growth in ridership of approximately 15% since 2013.

As the commission is aware there have been many changes that have taken place over the time frame since flexible fares were implemented in 2013. For instance, we have seen the unmanaged growth of TNC's, increase in ferry fares, a 46% increase in minimum wage, and all the new government mandated taxes and fees. The Rock Transportation Services Corp. dba Whidbey SeaTac Shuttle & Charter C-1077 has been able to maintain a competitive fare with only an 11% increase over this time period vs. the 15% inflation rate seen in the Puget Sound Region. Flexible fare regulation has had a positive outcome to the passenger transportation industry and despite operating in a dynamic industry and business environment in which passenger transportation companies are dealing with increases in traffic volumes, regulatory compliance requirements, minimum wages and other taxes and fees -- from a customer feedback and an operators perspective, flexible fare regulation has had a positive impact on providing more efficient and effective passenger transportation services. Thank you for the opportunity to provide comments on Docket TC-190898, if you require additional information or have any questions do not hesitate to call or email.

Sincerely,



D'Arcy Morgan, President  
The Rock Transportation Services Corp.  
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