

From: [Rose, Chris \(UTC\)](#)
To: [UTC DL Records Center](#)
Subject: FW: UTC Rulemaking Project Regarding WAC 480-30: Docket TC-161262
Date: Friday, January 27, 2017 10:42:25 AM

Please include this document in the record for TC-161262.

From: Kathy Roman [mailto:kathy@gorocketman.com]
Sent: Thursday, January 26, 2017 3:00 PM
To: Rose, Chris (UTC) <crose@utc.wa.gov>
Subject: Re: UTC Rulemaking Project Regarding WAC 480-30: Docket TC-161262

Rocket Transportation is not going to provide formal feedback due to the short response time.

Our informal response based on having operated Hired Auto under the DOL in addition to Auto Transportation under the UTC is that Hired Auto is not nearly as regulated for safety as Auto Transportation. It seems merely, pay your annual fee, have adequate insurance and we trust you to follow the rules. No driver requirements, vehicle inspections, or audits. I have no experience with the complaint process as we didn't receive any. My concern with TNC's is that they take advantage of this easy licensing and have even less oversight of who is doing the driving. They authorize drivers they have never met in person. The driver could be offering additional 'services' to their clients after completion of the trip - like prostitution - and no one would know unless a complaint is made.

As for regulations at SeaTac, we were not allowed to have Hired Auto service at the airport once we gained Auto Transportation authority which severely limited our ability to provide the premium service our clients wanted. Hence all of our vehicles regardless of size are now regulated by the UTC. SeaTac highly regulates which Cab company can pickup at SeaTac but then blow by that letting these less regulated companies do what it wouldn't let a cab do. I fail to comprehend SeaTac operations.

Add to that observations I made while at the last meeting held at SeaTac for the Door 00 changes coming soon. At the Arrivals Deck, cabs, hired autos, TNC's all acting irresponsibly with regard to lane utilization and staying with their vehicle. They would stop in the moving lane and leave their vehicle to retrieve their clients. I took quite a few pictures and upset many of the drivers that defended their actions by pointing out all of the other violators. These are the people we will share space with when we lose Door 00 and move to Door 02. If anyone at my company steps out of line a little, we are immediately reprimanded by SeaTac security and our ability to operate at the airport threatened.

We provide a needed service to our community. It works as long as we are able to be the only shared service in our area. We accept and support the oversight in return for the privilege to serve our area.

I appreciate the commission taking the time to review this matter affecting the regulated companies and the public.

Kathy Roman

On Thu, Jan 26, 2017 at 10:22 AM, Rose, Chris (UTC) <crose@utc.wa.gov> wrote:

To the UTC Regulated Auto Transportation Companies:

Several weeks ago the UTC distributed to all auto transportation, charter and excursion companies, and other interested parties, a CR-101 announcing a project to review WAC 480-30, which regulates auto transportation, charter and excursion companies, with a notice requesting comments on a set of questions and a notice of a workshop in March to discuss those questions. I'm hoping that you received and have had an opportunity to look at those documents. If not, they are attached.

The notice requested written comments by January 27 – tomorrow. So far, we have received one comment from one company. I recognize that today is not the due date, but I'm contacting you to find out whether you intend to file comments in response to the notice. I'm also interested in knowing whether you intend at this point to participate in the workshop. Neither response will be binding: I'm just trying to get a sense of whether we're going to get more comments and what the level of interest in the workshop is.

The first set of questions we sent out in the notice pertain to safety, employment and consumer protection rules. If the lack of comments is an indication that you have no concerns about those rules (instead of that you are still preparing your comments for filing tomorrow) I hope that you will let us know – that is also important information for us as we review the rules.

If you have questions, please feel free to respond to this email.

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