TO: WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

FROM: Michael Civitelli - Manager Landside Operations DATE: July 12, 2002

Seattle-Tacoma International Airport

RE: Rulemaking Workshop Comments - Docket TC-020497

In response to the Notice of Opportunity to file written comments under Docket TC-020497, we are hereby submitting the following Rulemaking comments and/or suggestions for your consideration:

#1. Should transportation companies with published schedules be authorized to cancel scheduled and advertised transportation services? The airport is experiencing with greater frequency, the situation of airport ground transportation passengers being stranded at the airport when they have relied upon the published schedule for ground transportation, without having secured a reservation. Companies should not be allowed to cancel or, if they do, they should be prepared to make alternative arrangements for those customers who were planning on using the cancelled service.

#2. Should auto transportation companies be authorized to operate at the airport or elsewhere with similar company names, or with names that might confuse the traveling public as to their operating authority granted by the WUTC? This issue can be very difficult and confusing to any member of the traveling public at a busy airport. Seattle-Tacoma International Airport has a large number of commercial transportation providers. Many travelers both visiting and those familiar with this area, are often unsure of the exact name of the company they are looking for, or the exact type of service they need. Unfortunately, it is often difficult for even airport staff to help them, as they often become frustrated with delays in their travel schedule. In addition, some companies then suggest that other competitor firms are stealing their business, or that staff members are directing their business elsewhere in an honest attempt to sort out the confusion. We advocate some sort of rule to regulate the names being used by transportation companies permitted by the WUTC so as to prevent confusing the traveling public.

#3. Should large International Airports on an annual basis determine their recommended level of ground transportation service needs for airport passengers, including establishing the maximum number of operators for any given Operator Class based on current airport activity and capacity limitations. This official determination would then be taken into account during the WUTC process, or proceedings before establishing final operating authority for any petitioning auto transportation company.

Please call should you me at (206) 431-4073 should you need any clarification of our comments. Thank you for the opportunity to participate in the Washington Utilities and Transportation Commission Rulemaking Workshop.