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STATE OF WASH.
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COMMISSION

To: WUTC **From:** Dan Carter
Fax: 360 586 2011 **Date:** January 24, 2007
Phone: **Pages:** 2
Re: PENALTY ASSESSMENT NO TE-061753 CC:

Urgent For Review Please Comment Please Reply Please Recycle

•Comments:

I am requesting a penalty reduction in the amount of \$1300 due in part to the financial hardship imposed on our small company and our eagerness and willingness to address all issue as raised. Please note the following:

*Annual review of drivers' driving record: Established a system to review each drivers' driving record in June of each year.

*Drivers' record of duty: During the first six months of 2006 better than 50% of drivers' hours logged was for three daily trips between Pasco and Walla Walla which is within a 100 mile radius.

*Exceeding 10 hours driving time: Normal driving time between the Tri Cities and Seattle is four hours. However, weather conditions, roadway accidents, and temporary road closures may require a driver to exceed the 10 hour rule in order to get passengers safely to destination.

*Exceeding 70 hours rule: While in Nevada for six days, driver received an unanticipated request from the team coach to transport students each day and remain on site with students each day.

*Window "push-out": This vehicle was out of service for approximately one year. Upon placing vehicle back in service, it missed the all vehicles window push-out schedule.

***Change of address:** Change of address notices were placed in communications with clients, vendors, agencies, etc. Apparently no communication was submitted to WUTC during the June-October time period.

***Please note that WUTC has been scheduled to conduct a driver's log book training class on February 3, 2007.**

Please inform me if I am permitted to appear before the Administrative Law Judge on February 12, 2007 to address this matter.

Thanks,

Dan Carter