

Airporter Shuttle
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Steven King
Executive Director & Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

In reply to: Docket TC-161262

Dear Mr. King

If you keep doing the things that you are doing, expect the same results. These words are often used to encourage change, however in the context of your question I think they could also be useful to evaluate whether our customers are satisfied with the product that auto transportation companies are providing.

Our sense is that they are satisfied

Scheduled transportation success is built on passenger volume and for the most part existing regulations assist in building volume in a particular territory. Volume is valuable because it provides more revenue to cover large fixed costs and increase profits. And the profits are necessary so we can invest and build more frequent or new runs for our customers.

At the same time the market needs to be protected against high prices whenever the government assigns these unique territories. A basic premise will always be followed by the market, and that is if the price of any service is not competitive, customers will chose one of the alternate methods. In the case of scheduled transportation the public is well protected against high prices because there are so many alternate methods that a person may use to get to Seatac airport.

In addition to company health and market pricing, passenger safety is also an important justification for auto transportation regulation. Our industry's safety results confirm that the UTC regulation is working well and should therefore not be changed. Many industries have the luxury of a single safety focus, but in transportation there is a bilateral focus on both vehicles and drivers. This bilateral focus is unique and with unique, comes extra expense. Transportation companies must pay special attention to the equipment and to the mechanics that repair them. Additionally, auto transportation companies must monitor their entire driver pool. They must train new hires well and also constantly work with their experienced drivers to train away complacency and keep their minds in a high level of focus. Further, auto transportation companies often carry two dozen or more

passengers in a single vehicle, on call car companies like Lift and Uber will have one or two passengers onboard. The travelling public is expecting the UTC to assure them of a safe ride and the issue itself becomes more acute when large vehicles are involved because the downside risk is so much greater. We are convinced that this assurance of public safety is best made through maintaining the existing regulation.

We encourage the UTC to keep the existing regulations because they are working for both the travelling public and for the auto transportation companies that are serving them well.

Sincerely

Richard Johnson
Airporter Shuttle