

Docket TC-020497

Passenger Transportation Company Rulemaking

Rulemaking Issues Paper

**Washington Utilities and Transportation Commission
July 31, 2002**

ISSUES AND STAFF PROPOSALS

TABLE OF CONTENTS

<u>Subject</u>	<u>Page</u>
ISSUE 1 - GENERAL DISCUSSION.....	3
ISSUE 2 - FORM AND STRUCTURE OF RULES.....	3
ISSUE 3 - POLICY STATEMENT.....	4
ISSUE 4 - DEFINITIONS.....	4
ISSUE 5 - UNSCHEDULED OR IRREGULAR SERVICE.....	5
ISSUE 6 - APPLICATIONS AND CERTIFICATES.....	6
ISSUE 7 - CONDEMNED OR PURCHASED AUTHORITY.....	7
ISSUE 8 - SAFETY.....	7
ISSUE 9 - MAPS.....	8
ISSUE 10 - INSURANCE.....	8
ISSUE 11 - COMPLIANCE POLICY.....	9
ISSUE 12 - EQUIPMENT LEASING.....	9
ISSUE 13 - CONSUMER PROTECTION.....	9
ISSUE 14 - OUTDATED REFERENCES.....	10
ISSUE 15 - TARIFF/SCHEDULE FILINGS.....	10
ISSUE 16 - FREE AND REDUCED RATES.....	11
ISSUE 17 - PUBLIC NOTICE.....	12
ISSUE 18 - OBLIGATION TO SERVE/REFUSAL OF SERVICE.....	12
ISSUE 19 - REPORTS AND REGULATORY FEES.....	13
ISSUE 20 - UNIFORM SYSTEM OF ACCOUNTS.....	13
ISSUE 21 - FINANCIAL AND OPERATING DOCUMENTS REQUIRED.....	14
ISSUE 22 - RATES.....	14
STAKEHOLDER COMMENTS.....	15

ISSUE 1 - GENERAL DISCUSSION: This topic requests input from stakeholders regarding the overall regulatory role of the Commission.

The questions shown below are examples of the type of information the team hopes to receive. Stakeholders should, however, feel free to introduce additional topics at the stakeholder meetings or through comments submitted to the Commission by mail, e-mail, or fax.

In regulating passenger transportation companies:

What is the Commission doing right?

What is the Commission doing wrong?

What is the Commission doing that we could do better?

What is the Commission doing that we don't need to do any longer?

What isn't the Commission doing that we should be doing?

Where do the current rules need to be clarified?

Which of the current rules impose undue burdens?

Which rules should be repealed entirely?

What additional topics/information need to be considered?

Do you agree or disagree with specific proposals? Why?

What concerns do you have about regulation of passenger transportation companies that were not addressed by the team?

Other: _____

ISSUE 2 - FORM AND STRUCTURE OF RULES: Currently rules for passenger transportation companies are contained in two separate chapters. It will better serve the public and the industry to have this information contained within a single chapter of rules.

Proposals:

1. Consolidate the auto transportation company rules from chapter 480-30 WAC and the charter and excursion carrier rules from chapter 480-40 WAC into a single chapter.
2. Develop a section of general rules that apply to all passenger transportation companies including: definition of terms, insurance requirements, driver and equipment safety requirements, compliance policy, reporting requirements, regulatory fees, filing types, filing fees and other common rules.
3. Develop separate sections of rules for those issues that do not apply to all passenger transportation companies including: rate regulation, system of accounts, tariff and schedule requirements, service levels, application proceedings, and other industry or issue specific rules.
4. Incorporate Commission standard rules regarding petitions for exemption from rule requirements, general application of rules, additional requirements, and severability.

ISSUE 3 - POLICY STATEMENT: Rules should contain a clear policy statement defining the Commission's regulation of passenger transportation companies, why the rules exist, who is subject to regulation, and who is not. Staff is asked frequently to answer those questions. It will better serve the needs of the public to have this information clearly and concisely reflected in the rules.

Proposals:

1. Develop a clear policy statement that gives reasons for regulation and the Commission's purpose in developing rules for auto transportation companies, charter, and excursion carriers.
2. Refer to provisions of Federal Aviation Authorization Act (FAAA) of 1995 that preempt state regulation of rates, routes, and services of property carriers, including express (freight) transported by passenger carriers.
3. Refer to provisions of federal law that preempt state regulation of rates and schedules of interstate carriers providing intrastate service over federally authorized interstate routes.
4. Refer to authority of Public Transportation Benefit Areas and other municipal corporations to limit operations of local carriers.
6. Refer to licensing requirements of limousines, taxis, and other for-hire companies under Title 46 RCW.

ISSUE 4 - DEFINITIONS: Some terms and concepts related to regulation of passenger transportation companies are not clearly defined in the current rules. Unclear definitions may lead to confusion, faulty interpretation of rules, and unintentional violations of those rules. Clear and concise definitions will benefit the public, passenger transportation companies, and Commission staff.

Proposals:

1. Incorporate definitions from current chapters of rule into one rule as much as possible. Review all currently listed definitions and rewrite in plain English. List words and phrases in the definition rule alphabetically to make the rule easier to use.
2. Define commonly used terms or phrases by amending current definitions or adding definitions to the rules.

“Airporter Service” -- This type of service is described in various Commission orders, but no definition is contained in rule.

“Leasing equipment,” “leasing authority,” and “subcontracting” should each be defined to clarify the differences between the terms and the requirements to lawfully operate vehicles under each.

Terms that are frequently used in describing types of auto transportation service are not clearly defined in current rules: door-to-door service, intermediate points, intermediate service, flag stops, named points, closed-door service, scheduled service, by-reservation only, express (freight/package) service, express passenger service, premium service, non-stop, route, direct route, irregular route, tariff, time schedule, priority loading.

The terms “regular route” and “fixed termini” need to be reviewed and updated to incorporate additional clarifying language from Commission orders.

Terms including: through-rates, joint rates, sales commissions, ticket agent agreements, seasonal rates & services, need to be reviewed and clarified in rule.

“Group,” “common purpose,” and “single contract” are undefined terms used in the charter statutes.

4. Clearly define the terms “motor vehicle” and “commercial motor vehicle” for the purposes of consistent application of the safety regulations.
5. Review Commission orders, statutes and policies and incorporate definitions from those documents into the passenger transportation rules.
6. Reconcile differences in any terms that are used in both tariffs and operating authorities but do not have a common meaning.
7. Review other state and federal definitions of common terms. Work closely with representatives of other agencies (local, state and federal) to ensure our definitions do not conflict with theirs.

ISSUE 5 - UNSCHEDULED OR IRREGULAR AUTO TRANSPORTATION SERVICE: Under current rules, entry standards and application filings are the same for all types of auto transportation certificate authority.

Proposals:

1. Establish rules that distinguish the differences between those auto transportation companies providing traditional regularly scheduled services and those limited to door-to-door, on-call, or by-reservation-only service.
2. Explore alternatives to current entry standards in conjunction with less restrictive rate oversight for those non-traditional irregular or unscheduled services.

ISSUE 6 - APPLICATIONS AND CERTIFICATES : Current rules on certificate applications and filing procedures are incomplete, do not include current practices, are not clearly defined, and may be duplicative or unnecessarily restrictive.

Proposals:

1. Establish “change of name” as an application filing type, with a reduced filing fee. Currently a charter/excursion company must file a new application with the full application fee and auto transportation companies must file transfer applications.
2. Establish an “acquisition of control” notice requirement for companies to file updated information when there is a change in ownership resulting from stock acquisition.
3. Establish rules allowing 30-days for a company to correct the cause of cancellation and reinstate its cancelled certificate.
4. Eliminate the requirement that a company hold multiple certificates for charter & excursion services. Establish rules requiring a single application filing and issue a single certificate authorizing both charter and excursion services.
5. Eliminate the requirement that an auto transportation company apply separately for additional authority to provide charter & excursion services. Establish rules to include both charter and excursion services with a company’s auto transportation certificate authority.
6. Explore possibility of issuing charter and excursion certificates through a simple registration process rather than a grant of authority by commission order.
7. Establish minimal requirements for filing and approval of auto transportation certificate applications to provide intrastate service over an approved interstate route.
8. Reconcile time frames for filing auto transportation certificate application protests (20 days) and contemporaneous applications for overlapping authority (30 days).
9. Reconcile provisions in auto transportation company rules with provisions of Chapter 480-09 WAC (Commission’s Procedural Rules). Refer to provisions of Chapter 480-09 as governing Commission application hearings. Require protestant or intervener to serve applicant with copy of filing. Clarify that parties who qualify as protestants, but do not file timely protests, may not intervene.
10. Establish standardized map-filing requirements for auto transportation certificate applications.

ISSUE 7 - CONDEMNED OR PURCHASED AUTO TRANSPORTATION AUTHORITY:
Current rules do not establish notice requirements when a Public Transportation Benefit Area (PTBA) or other municipal corporation purchases or condemns all or part of an auto transportation company's certificated authority.

Proposals:

1. Establish company notice requirements when a PTBA or other municipal entity gives notice of its intent to purchase or condemn all or part of a company's certificate authority.
2. Develop provisions to revise or cancel a company's certificate authority when a PTBA or other municipal corporation purchases or condemns all or part of the company's certificate authority.

ISSUE 8 - SAFETY: For compliance and enforcement purposes, the Commission needs to ensure that current federal standards are adopted for passenger transportation companies; that those rules are applicable and enforceable on drivers and vehicles transporting passengers in Washington State.

Proposals:

1. Adopt by reference the most current version of federal regulations related to driver and vehicle safety. Identify those safety requirements that apply to all motor vehicles and those that apply only to "commercial motor vehicles."
2. Review current rules to eliminate outdated references and requirements that duplicate those contained in federal rules adopted by reference. Eliminate UTC accident reporting requirements and adopt federal requirements for accident register.
3. Review exceptions to federal rules and eliminate those exceptions that are outdated or no longer relevant. Example: Current exception to the federal rules allows for 18 year old drivers. Should that exception be continued?
4. Adopt the most current version of the "North American Uniform Out-of-Service Criteria." Update reference to the availability of copyrighted documents. Remove "restricted service conditions" and other references that are no longer part of the out-of-service criteria.
5. Explore differences in safety requirements for "freight" carriers and "express" transported by a passenger carrier in vehicles other than those used to transport passengers. Reference the safety requirements for property carriers in Chapter 480-14 WAC and resolve any conflict between the chapters.

6. Adopt or amend rules, as necessary, to ensure UTC safety regulations do not conflict with those of other agencies. Agencies whose rules need to be reviewed to ensure there is no conflict include:

Washington State Patrol
Washington State Department of Licensing
Federal Motor Carrier Safety Administration
Others? _____

ISSUE 9 - MAPS: We need to ensure that maps filed with the Commission accurately show the territories that auto transportation companies are authorized to serve. Currently not all carriers have filed an accurate set of maps.

Proposals:

1. The rules should clearly define standards for maps submitted to the Commission. (1" = XX miles, streets or other geographical features used to describe territory clearly identifiable, etc.).
2. Maps filed in conjunction with auto transportation certificate applications should meet Commission-set standards.
3. An auto transportation company that files separate tariffs or schedules for portions of its certificated authority should be required to supply a map clearly identifying those routes or territories. The maps should meet Commission-set standards.

ISSUE 10 - INSURANCE: Current rules establish the minimum level of public liability and property damage insurance for auto transportation companies at a much lower level than that of a charter/excursion companies operating the same vehicle. Current rules do not define acceptable forms of insurance, filing requirements, or suspension and cancellation procedures for failure to maintain proper insurance filings

Proposals:

1. Establish minimum levels of public liability and property damage insurance coverage consistent with federal insurance minimums for all passenger transportation companies.
2. Clearly describe acceptable insurance forms and filing requirements.
3. Outline the process for notice of insurance cancellation, suspension, and cancellation of certificates for failure to maintain properly filed insurance.
4. Explore options for voluntary or seasonal suspension of insurance.

5. Explore differences in insurance requirements for “freight” carriers and “express” transported by a passenger carrier in vehicles other than those used to transport passengers. Reference the insurance requirements for property carriers in Chapter 480-14 WAC and resolve any conflict between the chapters.

ISSUE 11 - COMPLIANCE POLICY: Currently Commission rules do not clearly define a compliance policy to address illegal operations of passenger transportation companies. The Commission needs to communicate to companies its expectations and the sanctions that may be invoked for failing to meet those expectations.

Proposals:

1. Add rules that state how the Commission will enforce the Chapter, when the Commission will take some form of administrative action, and the sanctions applicable to companies operating in conflict with the rules.
2. Prepare a compliance plan that outlines the procedures and processes that will take place when information is received about illegal operations including companies operating without the required certificate authority. This plan would include technical assistance, investigation policies and administrative action outlines

ISSUE 12 - EQUIPMENT LEASING: Companies leasing equipment with drivers are responsible for operations conducted with that equipment. They assume responsibility for liability insurance, compliance with drug and alcohol testing compliance, driver qualifications, etc. Current rules do not address leasing requirements.

Proposals:

1. Clearly define the requirements for passenger transportation companies to supplement their fleets with leased vehicles. Include the additional obligation a company assumes when the lease covers both the equipment and the driver.
2. Include in the rules specifics of documentation that must be prepared and maintained on leased equipment. (Examples: executed leases, driver records, equipment records, payment records, etc.)

ISSUE 13 - CONSUMER PROTECTION: Current rules do not inform consumers or passenger transportation companies about the WUTC’S consumer complaint and investigation process.

Proposals:

1. Develop rules regarding the UTC’s informal and formal complaint process.

2. Develop rules that establish company responsibilities for handling customer complaints and assisting UTC staff to investigate informal complaints.
3. Develop rules that establish business office availability to customers (i.e. hours of operation, posted telephone number, etc.)
4. Explore alternative arrangements for customers that are stranded at the airport because a scheduled trip is cancelled for lack of a confirmed reservation.
5. Establish baggage liability limits. Consider adoption of federal baggage liability rules. Establish a process for periodic review and adjustment of those limits.
6. Include in the Commission's written compliance plan sanctions/remedial actions for service quality issues raised by consumers.

ISSUE 14 - OUTDATED REFERENCES: Generally review the chapter and clean up outdated references and regulations that are no longer relevant.

Proposals:

1. Update rules referencing federal agencies to reflect current agency names i.e. Federal Motor Carrier Safety Administration is now the agency responsible for establishing federal motor carrier safety (driver & equipment) regulations and also the successor to the Interstate Commerce Commission for granting interstate motor carrier operating authority.
2. Eliminate rules establishing requirements for the transportation of "express."

ISSUE 15 - TARIFF/SCHEDULE FILINGS – FORMAT AND OTHER ISSUES: Existing rules relating to tariffs need to be clarified so that they accurately reflect statute and policy relating to the filing of tariffs and service schedules with the Commission. Auto transportation companies should not be required to hunt for these provisions, they should be able to go to one place in the rules to obtain the information they need to file properly.

Proposals:

1. Consolidate rate and schedule requirements from the auto transportation rules and Tariff Circular #6 (Chapter 480-149 WAC).
2. Clarify that each tariff must accurately define the area in which the tariff applies. If a tariff applies in only a portion of the territory or route authorized by a certificate, the tariff must include a map that clearly shows the area in which the tariff applies. The map must comply with mapping standards adopted by the Commission.

3. Establish standard tariff and schedule formats to ensure that filings are sufficiently uniform to allow for meaningful analysis, yet flexible enough to meet industry needs.
4. Establish ticketing standards that include procedures, form and content.
5. State clearly that auto transportation companies must file with the Commission prior to implementing any change to their filed tariffs or schedules.
6. Establish standard transmittal letters, process for submitting substitute pages to a filing, and standards regarding cost justification for rate filings.
7. Review provisions for joint tariffs, through rates, through ticketing, and agent agreements. Clarify how rules apply and when filings are required.
8. Update requirements for filing and approval of ticket sales agreements and commissions for those sales.
9. Eliminate or reduce filing and review of intrastate tariffs and schedules for services provided under federal authority over authorized interstate routes.
10. Incorporate the practice of allowing a company to file a schedule reflecting seasonal operations to eliminate annual filings for temporary discontinuance.
11. Incorporate in rules language reflecting the provisions of statute that state it is unlawful for auto transportation companies to assess rates that are higher, lower, or different from those contained in the carrier's filed tariff.

ISSUE 16 - FREE AND REDUCED RATES: Current statutes allow auto transportation companies to provide services at free or reduced rates to, among others, charitable institutions and persons exclusively engaged in charitable work; indigent, destitute and homeless persons and to such persons when transported by charitable societies or hospitals. Current rules do not address processes for filing free and reduced rate tariffs.

Proposal:

1. Adopt rules that define when free and reduced rates may be used, the process for filing those rates, and the criteria (such as avoidance of discrimination and/or preference) passenger transportation companies must observe to file those rates.
2. Clarify that shareholders/owners absorb the cost associated with providing service under free or reduced rates, not the fare paying passengers.
3. Clarify standards for other discounted rates such as those offered to groups, senior citizens, and low-income passengers and how those discounts apply.

ISSUE 17 - PUBLIC NOTICE: Auto Transportation Companies making filings should have clear and concise information regarding public notice obligations. Existing public notice rules may be unclear or incomplete.

Proposals:

1. Update rules to clearly define how and when an auto transportation company must provide public notice of a proposed change in its rates, schedules, or services.
2. Clarify the types of tariff and schedule changes and the notice requirements for each.
3. Clarify the information an auto transportation company must show on a proper public notice.

ISSUE 18 - OBLIGATION TO SERVE/REFUSAL OF SERVICE: An auto transportation company's obligation to serve all customers in their authorized territory and the company's right to refuse service in certain circumstances should be clearly defined in rules so that it can be readily available to the regulated industry, the public, consumers, and regulators.

Proposals:

1. Adopt rules clearly defining a passenger transportation company's obligation to serve all consumers within its authorized service territory, and to provide service to the satisfaction of the Commission.
2. Clarify circumstances under which passenger transportation companies may refuse to provide service to customers.
3. Establish rules regarding "by reservation-only" service. (When should a company be allowed to schedule service by reservation only? Can service to named points in a certificate be served by-reservation only? What constitutes a reservation? Can companies require credit cards or other security to hold reservations? Can a company cancel a scheduled run if no reservations are made? How does by-reservation only service affect a company's rates?)
4. Clarify the difference between temporary discontinuance of service, seasonal operations, and abandoned route. Establish criteria for requesting temporary discontinuance of all or a portion of a company's service.
5. Establish standards for allowing a company to request a seasonal suspension of insurance in conjunction with a request for temporary discontinuance of service.

ISSUE 19 - REPORTS AND REGULATORY FEES: All passenger transportation companies are required to pay annual regulatory fees. Each auto transportation company is required to file an annual report and a report of gross operating revenue. The Commission may require charter/excursion carriers to file reports as necessary to enforce the chapter. Current rules do not clearly define the processes for these functions or the sanctions for failing to file complete, accurate reports complete, accurate reports.

Proposal:

1. Establish an annual safety/operational report for charter and excursion companies to update company safety, ownership, and operational information. Example of operational information: contact person for complaint resolution, company phone number or e-mail address, accidents, miles, etc.
2. Add charter and excursion safety/operational reporting to the existing auto transportation annual report for those carriers providing both types of service.
3. Establish “one vehicle” as a minimum annual fee for charter and excursion carriers.
4. Review and update annual report and regulatory fee rules to ensure that filing requirements are current and due dates are clearly stated.
5. Clarify that the UTC may update the information it needs by amending the annual report forms or by requesting companies to file additional reports.
6. Clearly state that companies must provide all information requested and that the information provided must be true and accurate. Incomplete forms may be rejected and returned.
7. Identify sanctions the UTC may take for filing inaccurate or incomplete forms, failing to file reports, failing to pay regulatory fees, or failing to file reports or pay regulatory fees in a timely manner.
8. Remove all references to auto transportation quarterly reports.

ISSUE 20 - UNIFORM SYSTEM OF ACCOUNTS: The Uniform System of Accounts (USOA) prescribed for auto transportation companies in Chapter 480-30 WAC may no longer be relevant to some company operations.

Proposals:

1. Update Uniform System of Accounts for auto transportation companies.
2. Allow companies to use other accounting systems, provided books and records are sufficient to complete annual report using figures that reconcile with the USOA.

ISSUE 21 - FINANCIAL AND OPERATING DOCUMENTS REQUIRED: Auto transportation companies need to keep and have available the necessary records to support rate filings. Failure to maintain these records and to submit them with rate case filings unnecessarily complicates the rate making and audit processes.

Proposal:

1. Identify, in rule, the necessary records and documents that a company must maintain and must provide in support of proposed rates at time of filing.
2. Establish a retention schedule for financial and operating records.

ISSUE 22 - RATES: As the auto transportation industry continues to evolve it is important to periodically revisit the issue of rates, appropriate rates structures, and rate setting methodology used to determine if rates are fair, just, reasonable and sufficient. This topic is presented to stimulate discussion and gather input as to what rate structure(s) are appropriate now and in the future.

Proposals:

1. Explore alternative rate structures. Examples: banded rates, seasonal rates, and competitive rates.
2. Explore alternative methodology to determine if rates are fair, just, reasonable, and sufficient.
3. Identify issues unique to competitive providers with overlapping routes. How closely should the UTC monitor their rates? Should there be a formalized alternative rate process for competitive routes?

SUMMARY OF STAKEHOLDER COMMENTS - TO DATE:

1. David Estes, Pacific Northwest Distributing, LLC, d/b/a Vashon Shuttle Service

Issue – Use of HOV Lanes. Auto transportation companies should be allowed to use HOV lanes to deadhead between locations.

2. Brooks Harlow, Washington Airporter Operators Association

Issue 1 – Limit Competitive Entry. The Commission can take modest steps to discourage applicants that are not financially fit, that have questionable backgrounds, and are not truly proposing an innovative service from applying. Specifically mentioned:

Increase the application fee.

Establish minimum balance sheet requirements.

Bar persons engaged in unlawful transportation of passengers from applying.

Require a background check, including criminal and driving records.

Bar persons convicted of felonies and misdemeanors, as well as certain traffic violations from owning or controlling certificates.

Issue 2 – Ensure just, fair, reasonable, and sufficient rates. The Commission should examine standards and methods for establishing rates and consider adopting rules governing auto transportation company rates. Update the current formula for establishing rates to provide the needed flexibility, incentives to reduce costs, ability to raise necessary capital, and ensure a healthy industry.

Issue 3 – Insurance Minimums. The Commission should increase minimum insurance requirements.

Issue 4 - Consolidation of Rules. The Commission may wish to adopt rules common to all three types of passenger carriers, but must be cautious and accommodate the different statutory minimums and requirements applicable to the different types of carriers.

3. Michael Civitelli, Manager Landside Operations, Seattle-Tacoma International Airport.

Issue 1 – Service by Reservation Only. Companies should not be allowed to cancel scheduled runs just because they do not have a secured reservation. If they do, they should be prepared to make alternative arrangements for customers.

Issue 2 – Use of Similar Company Names. To prevent confusing the traveling public, there should be some regulation of the names transportation companies are authorized to use.

Issue 3 – Airport Determination of Ground Transportation Needs. The WUTC should take into account the airport's determination of ground transportation service needs for airport passengers before granting final operating authority to an auto transportation company.

WRITTEN COMMENTS. The Commission seeks your input on the issues identified in this document and encourages you to comment on the proposals identified by staff, to present alternatives to the staff proposals, or to add additional topics not presented by staff.

Written comments on this issue paper are due in the Commission offices no later than **August 28, 2002**. All commenters are asked, but not required, to file an original plus ten copies of their comments. The Commission also requests, but does not require, that comments be provided in electronic format via e-mail to records@wutc.wa.gov or on a 3-1/2-inch IBM formatted diskette, in ASCII text, .pdf format, .doc (Word 97 or later) or .wpd (Wordperfect 6.0 or later), labeled with the docket number of this proceeding (TC-020497) and the commenter's name and type of software used.

Written comments should be addressed to: **Secretary, Washington Utilities and Transportation Commission, 1300 S. Evergreen Park Drive S.W., P.O. Box 47250, Olympia, WA 98504-7250.**

Commission Staff will make all comments provided in electronic format available on the Commission's web site at <http://www.wutc.wa.gov/020497>.

NOTICE OF WORKSHOP. The Commission has scheduled an initial workshop to discuss Chapter 480-30 WAC, relating to auto transportation companies and Chapter 480-40 WAC, relating to passenger charter & excursion carriers. The workshop will be held **September 12, 2002**, 9:30 a.m. – 3:30 p.m. in the Commission's Hearing Room, 2nd Floor, Chandler Plaza, 1300 S. Evergreen Park Drive, S.W., Olympia, Washington.

The Commission will post and regularly update its website to include information that pertains to this rulemaking.

Information will be provided to you individually if you request it. If you wish to receive further information on this rulemaking you may either: (1) submit a written request; (2) call the Commission's records center at (360) 664-1234; or (3) e-mail the Commission at records@wutc.wa.gov. When contacting the Commission, please refer to Docket No. TC-020497.