



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

September 6, 2016

Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P.O. Box 47250
Olympia, WA 98504-7250

RE: *Washington Utilities and Transportation Commission v. International District Parking Association d/b/a Merchants Parking Association, Merchants Parking/Transia*
Commission Staff's Response to Request for Payment Arrangement
Docket TE-160829

Dear Mr. King:

On July 6, 2016, the Washington Utilities and Transportation Commission (Commission) issued Penalty Assessment TE-160829 against International District Parking Association d/b/a Merchants Parking Association, Merchants Parking/Transia (Transia or Company) in the amount of \$36,900 for three hundred sixty-five acute and critical violations of WAC 480-30-221 Vehicle and Driver Safety Requirements, which requires charter and excursion carriers to comply with Title 49 Code of Federal Regulations (CFR) Part 382 – Controlled Substances and Alcohol Use and Testing, Part 383 – Commercial Driver's License Standards, Part 391 – Qualifications of Drivers, Part 395 – Hours of Service of Drivers and Part 396 – Inspection, Repair, and Maintenance.

On July 21, 2016 Transia filed with the Commission its application for mitigation of penalties. Matthias Duoos, operations manager of Transia, admitted to the majority of violations noted in the penalty assessment, but asked that the penalties be reduced for the reasons set out in his response.

On August 1, 2016, Commission staff (Staff) filed a response recommending the Commission grant the Company's request for mitigation, in part, reducing the assessed penalty from \$36,900 to \$19,450. On August 17, 2016, Staff filed a supplemental response further addressing Transia's explanations of its violations of CFR Part 391.45(a) and CFR Part 396.11(a).

On August 23, 2016, the Commission issued an order granting Transia's request for mitigation of the \$36,900 penalty, and reduced the penalty to \$19,450. The order states that the Company must

either pay the \$19,450 penalty or file jointly with Staff a proposed payment arrangement no later than September 7, 2016.

On August 31, 2016, Transia filed with the Commission a letter requesting a payment plan. In the letter Transia states that although it reported \$2,100,000 in gross revenue for 2015, the Company's expenses meet or exceed its earnings, attributing its minimal profit to offering low cost and free transportation services.

On September 1, 2016, Transia contacted Staff and proposed payment arrangements on the mitigated penalty amount of \$19,450. Commission Staff supports the Company's proposed monthly payments as follows:

Payment Plan		
Installment	Due Date	Amount
1	September 20, 2016	\$820.00
2	October 20, 2016	\$810.00
3	November 20, 2016	\$810.00
4	December 20, 2016	\$810.00
5	January 20, 2017	\$810.00
6	February 20, 2017	\$810.00
7	March 20, 2017	\$810.00
8	April 20, 2017	\$810.00
9	May 20, 2017	\$810.00
10	June 20, 2017	\$810.00
11	July 20, 2017	\$810.00
12	August 20, 2017	\$810.00
13	September 20, 2017	\$810.00
14	October 20, 2017	\$810.00
15	November 20, 2017	\$810.00
16	December 20, 2017	\$810.00
17	January 20, 2018	\$810.00
18	February 20, 2018	\$810.00
19	March 20, 2018	\$810.00
20	April 20, 2018	\$810.00
21	May 20, 2018	\$810.00
22	June 20, 2018	\$810.00
23	July 20, 2018	\$810.00
24	August 20, 2018	\$810.00
Total:		\$19,450.00

Transia is aware that if it fails to pay any installment by the due date, or fails to pay at least the minimum monthly installment by the due date, the entire remaining balance will become immediately due and payable without further Commission order.

If you have any questions, please contact Jason Hoxit, Compliance Investigator, Transportation Safety, at 360-664-1320, or by e-mail at JHoxit@utc.wa.gov.

Sincerely,

A handwritten signature in blue ink that reads "David Pratt". The signature is written in a cursive style with a large initial "D".

David Pratt
Assistant Director, Transportation Safety