



Washington Utilities and Transportation Commission

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|---|--|---|---|
|  | US DOT # 2408309 | Legal: SANI MAHAMA MAUROU Operating (DBA): SEATAC AIRPORT 24 | |
| MC/MX #: 000000 | | State #: C-65615 | Federal Tax ID: |
| Review Type: Compliance Review (CR) | | | |
| Scope: Principal Office | Location of Review/Audit: Company facility in the U. S. | | Territory: |
| Operation Types | | Interstate | Intrastate |
| Carrier: | N/A | Non-HM | Business: Individual |
| Shipper: | N/A | N/A | Gross Revenue: \$90,000.00 |
| Cargo Tank: | N/A | | for year ending: 12/31/2014 |
| Company Physical Address: | | | |
| 1800 South Jackson Street Suite 211 SEATTLE, WA 98144 | | | |
| Contact Name: Sani Mahama | | | |
| Phone numbers: (1) 206-356-7664 | | (2) | Fax |
| E-Mail Address: Sanimaurou@yahoo.com | | | |
| Company Mailing Address: | | | |
| 1800 South Jackson Street Suite 211 SEATTLE, WA 98144 | | | |
| Carrier Classification | | | |
| Authorized for Hire | | | |
| Cargo Classification | | | |
| Passengers | | | |
| Equipment | | | |
| | Owned | Term Leased | Trip Leased |
| Van, 9-15 | 2 | 0 | 0 |
| Power units used in the U.S.: 2 | | | |
| Percentage of time used in the U.S.: 100 | | | |
| Does carrier transport placardable quantities of HM? | | No | |
| Is an HM Permit required? | | N/A | |
| Driver Information | | | |
| | Inter | Intra | Average trip leased drivers/month: 0 |
| < 100 Miles: | | 2 | Total Drivers: 2 |
| >= 100 Miles: | | | CDL Drivers: 0 |



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|--|---|-------------------------|------------------------------------|
|  <p>WUTC WASHINGTON UNIVERSITY TRANSPORTATION CENTER</p> | <p>SEATAC AIRPORT 24 (Sani MAHAMA MAUROU dba) U.S. DOT #: 2408309</p> | <p>State #: C-65615</p> | <p>Review Date: 01/22/2016</p> |
|--|---|-------------------------|------------------------------------|

Part A

QUESTIONS regarding this report or the Federal Motor Carrier Safety Rules
may be addressed to the WUTC Attn: Mathew Perkinson

PO BOX 47250
Olympia, WA 98504-7250
Phone: (360) 664-1236 Fax: (360) 586-1150 Email: Mperkinson@utc.wa.gov

This report will be used to assess your safety compliance.

Person(s) Interviewed

Name: Sani Mahama Maurou

Title: Owner

Name:

Title:





SEATAC AIRPORT 24 (S... MAHAMA MAUROU dba)

U.S. DOT #: 2408309

State #: C-65615

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Part B Violations

| 1 | Primary: 391.45(b)(1) Secondary: 391.11(a) CFR Equivalent: 391.45(b)(1) | Discovered | Checked | Drivers/Vehicles In Violation | Checked |
|---|---|------------|---------|----------------------------------|---------|
| STATE CRITICAL | | 2 | 2 | 2 | 2 |
| Description Using a driver not medically examined and certified during the preceding 24 months. Example Driver name: Ndow Yankuba Trip date: 10/1/2015 Description of violation: Carrier allowed driver to operate a commercial motor vehicle while not medically certified. The October 2015 time records show that driver Ndow Yankuba operated a commercial motor vehicle a total of 19 times in October. In the past six months, the records show that Mr. Ndow operated 114 times. Driver name: Sani Maurou Trip date: 10/1/2015 Description of violation: Carrier allowed driver to operate a commercial motor vehicle while not medically certified. The October 2015 time records show that driver Sani Maurou operated a commercial motor vehicle a total of 22 times in October. In the past six months, the records show that Mr. Maurou operated 133 times. | | | | | |
| 2 | Primary: 391.51(a) CFR Equivalent: 391.51(a) | Discovered | Checked | Drivers/Vehicles In Violation | Checked |
| STATE CRITICAL | | 2 | 2 | 2 | 2 |
| Description Failing to maintain driver qualification file on each driver employed. Example Driver name: Sani Maurou Trip date: 10/1/2015 Description of violation: Carrier failed to create a driver qualification file. Driver name: Ndow Yankuba Trip date: 10/1/2015 Description of violation: Carrier failed to create a driver qualification file. | | | | | |
| 3 | Primary: 396.3(b) CFR Equivalent: 396.3(b) | Discovered | Checked | Drivers/Vehicles In Violation | Checked |
| STATE CRITICAL | | 2 | 2 | 2 | 2 |
| Description Failing to keep minimum records of inspection and vehicle maintenance. Example Trip date: 10/1/2015 Description of Violation: Seatac 24 operates two 9-15 passenger vehicles. Seatac 24 does not keep any records of inspection or vehicle maintenance on either vehicle. | | | | | |





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Part B Violations

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|------------------------|---------------------------|------------------|---------------|-------------------|--------------|
| 4 STATE CRITICAL | Primary: 396.11(a) | Discovered 41 | Checked 60 | Drivers/Vehicles | |
| | CFR Equivalent: 396.11(a) | | | In Violation 2 | Checked 2 |

Description

Failing to require driver to prepare driver vehicle inspection report.

Driver name: Ndow Yankuba

Trip date: 10/1/2015

Description of violation: Mr. Yankuba operated a commercial motor vehicle on at least 19 separate occasions in October 2015 as follows: 10/1, 10/2, 10/4, 10/5, 10/7, 10/8, 10/10, 10/11, 10/13, 10/14, 10/18, 10/19, 10/23, 10/24, 10/26, 10/27, 10/29, 10/30, and 10/31.

Driver name: Sani Maurou

Trip date: 10/1/2015

Description of violation: Mr. Maurou operated a commercial motor vehicle on at least 22 separate occasions in October 2015 as follows: 10/1, 10/2, 10/3, 10/4, 10/5, 10/8, 10/9, 10/10, 10/11, 10/12, 10/13, 10/16, 10/17, 10/18, 10/19, 10/20, 10/21, 10/25, 10/26, 10/27, 10/28, and 10/29.

| | | | | | |
|------------|---------------------------|-----------------|--------------|-------------------|--------------|
| 5 STATE | Primary: 387.31(d) | Discovered 1 | Checked 1 | Drivers/Vehicles | |
| | CFR Equivalent: 387.31(d) | | | In Violation 1 | Checked 1 |

Description

Failing to maintain at principal place of business required proof of financial responsibility for passenger vehicles.

Example

Vehicle License or Company Number: CH-65615

Trip Date: 10/1/2015

Description of Violation: Carrier failed to maintain proof of insurance.

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|------------|---------------------------|-----------------|--------------|-------------------|--------------|
| 6 STATE | Primary: 396.17(a) | Discovered 1 | Checked 2 | Drivers/Vehicles | |
| | CFR Equivalent: 396.17(a) | | | In Violation 1 | Checked 2 |

Description

Using a commercial motor vehicle not periodically inspected.

Example

Employee name: Ndow Yankuba


Trip date: 11/1/2015

Procedure not complied with: Mr. Yankuba operated a commercial motor vehicle on at least one occasion while the vehicle had not been periodically inspected. The last periodic inspection was conducted on October 9, 2014. Mr. Yankuba operated on November 1, 2015.

| | |
|---|---|
| Safety Fitness Rating Information: Total Miles Operated 18,000 Recordable Accidents 0 Recordable Accidents/Million Miles 0.00 | OOS Vehicle (CR): 0 |
| | Number of Vehicle Inspected (CR): 0 |
| | OOS Vehicle (MCMIS): 0 |
| | Number of Vehicles Inspected (MCMIS): 0 |

| | | | | |
|--|-----------------------|--------------|-----------------|---|
| Your proposed safety rating is : <p style="text-align: center;">UNSATISFACTORY</p> | Rating Factors | | | |
| | | Acute | Critical | |
| | Factor 1: | S | 0 | 0 |
| | Factor 2: | U | 0 | 2 |
| | Factor 3: | S | 0 | 0 |
| | Factor 4: | U | 0 | 2 |
| | Factor 5: | N | 0 | 0 |
| Factor 6: | S | - | - | |



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|--|---|------------------------------------|
|  <p>UIC UNIFORMITY OF INFORMATION COLLECTIONS REGISTRATION</p> | <p>SEATAC AIRPORT 24 (S. MAHAMA MAUROU dba) U.S. DOT #: 2408309</p> | <p>Review Date: 01/22/2016</p> |
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Part B Violations





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Part B Requirements and/or Recommendations

1. For all Investigations:

- **Understand Why Compliance Saves Time and Money:** Compliance with FMCSRs will not only save lives, but also saves your business time and money. Tracking how much your business spends on non-compliance activities can help you understand the many benefits of compliance to your business and why safety is good business.
- **Document and Follow Through on Action Plans:** Document and follow through on action plans to ensure the actions you are taking are creating improvement in safety management and compliance.
- **NOTICE:** A pattern and/or repeated violations of the same or related acute or critical regulations (violations of the same Part in Title 49, Code of Federal Regulations) will cause the maximum penalties allowed by law to be assessed under Section 222 of the Motor Carrier Safety Improvement Act of 1999 (MCSIA). A pattern of violations means two or more violations of acute and/or critical regulations in three or more Parts of Title 49, Code of Federal Regulations discovered during any eligible investigation. Repeated violations means violation(s) of an acute regulation of the same Part of Title 49, Code of Federal Regulations discovered in an investigation after one or more closed enforcement actions within a six year period and/or violation(s) of a critical regulation in the same Part of Title 49, Code of Federal Regulations discovered in an investigation after two or more closed enforcement actions within a six year period.
- **NOTICE:** 49 CFR Part 391.23 requires prospective employers to, at a minimum, investigate a driver's employment information, crash record, and alcohol and controlled substances history from all employers the driver worked for within the previous 3 years.

The Pre-Employment Screening Program (PSP) is a screening tool that assists motor carriers in investigating crash history and roadside safety performance of prospective drivers. The PSP allows motor carriers to purchase 5 years of crash data and 3 years of roadside inspection data from the Federal Motor Carrier Safety Administration's (FMCSA) Motor Carrier Management Information System (MCMIS). Records are available 24 hours a day via Web request. Motor carriers should visit the following website for more information:
<http://www.psp.fmcsa.dot.gov/Pages/default.aspx>

- All motor carriers and truck drivers are needed to fight against terrorism and hijacking. You could be a target. Protect yourself, your trucks, your cargo, and your facilities. Discuss with your employees/drivers the "Security Measures for Truck Drivers and Companies" which were provided and reviewed with motor carrier official. Motor carriers should visit the following website for more information:
<http://www.fmcsa.dot.gov/documents/Hijacking-Brochure.pdf>
- **PLEASE NOTE:** The violations discovered during this compliance review may affect the civil penalty proposed in any subsequent Notice of Claim. In addition, your history of prior violations of the Federal Motor Carrier Safety Regulations, Federal Hazardous Material Regulations or the Federal Motor Carrier Commercial Regulations may also affect the civil penalty proposed in any subsequent Notice of Claim. Your signature for receipt of this report acknowledges your understanding that the violations discovered by the commission during this review may be used to calculate any civil penalty proposed as a result of this review. Your signature is not an admission of the violations identified.

Serious violations were recorded on this investigation report. These violations will impact your safety record. Furthermore, these violations may result in a follow-up investigation at a later date unless adequate evidence of corrective action is forwarded to our office:

Mathew Perkinson, Safety Investigator
Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

385.15

If you believe the proposed rating is in error and there are factual and procedural issues in dispute, Part 385.15 outlines procedures for petitioning the Utilities and Transportation for an administrative review of these findings. Your





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Part B Requirements and/or Recommendations

petition should be addressed to:

Mathew Perkinson, Safety Investigator
Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

385.17

In addition, a request for a revised rating based on corrective actions may be made at any time. Part 385.17 outlines the procedures for such a request. The request must be made in writing, must describe the corrective action taken and must include other documentation that may be relied upon as a basis for the requested change. Address your written request to:

Mathew Perkinson, Safety Investigator
Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

This letter should be submitted as soon as possible. If you have a proposed Unsatisfactory or Conditional Rating the letter must be submitted prior to the effective date of your Unsatisfactory or Conditional Rating.

• Passenger & Placardable HM Carriers: This review will result in a Proposed Safety Rating. The findings indicate you are currently operating at an unsatisfactory level of safety compliance. A written notice of proposed unsatisfactory rating will be sent to you by the Utilities and Transportation Commission via U.S. Mail. If you fail to obtain an improved rating within 45 days of the date that notice is sent, the unsatisfactory rating will become final and you must cease intrastate operations.

Information on your compliance status, roadside inspections, regulatory changes, accident countermeasures and hazardous material incident prevention manual is available on the Internet at the Federal Motor Carrier Safety Administration's web site at <http://www.fmcsa.dot.gov/> and <http://www.safer.fmcsa.dot.gov/>.

2. Ensure that all drivers are fully and properly qualified before operating in interstate/Intrastate commerce. Maintain a complete file as required for each driver, documenting the qualification process.
3. Establish a systematic maintenance records program for all vehicles. Maintain a complete file for each subject vehicle, recording all repair, maintenance and inspection operations performed.
4. Require all drivers to prepare a written inspection report for each day a vehicle is operated. Ensure that each report is signed by the driver, certified, and reviewed if defects are reported.
5. Keep all driver vehicle inspection reports, signed, certified, and reviewed as required on file for at least 90 days.
6. Ensure that commercial vehicle(s) are not operated without the required periodic inspection as per CFR 396.17(a). The inspection shall be conducted in accordance set forth in Appendix G of 49 CFR.
7. Ensure that at least once every 12 months, make an inquiry into the driving record of each driver it employs, covering at least the preceding 12 months, to the appropriate agency of every State in which the driver held a commercial motor vehicle operator's license or permit during the time period. 49 CFR 391.51(b)(4)
8. Ensure to keep the identification of the vehicle make, serial number, year, and tire size. 49 CFR 396.3(b)(1)
9. No motor carrier shall operate a motor vehicle until the carrier has obtained and in effect the minimum levels of financial responsibility. 49 CFR 387.7(a)





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Part B Requirements and/or Recommendations

- 10. Do not allow physically unqualified drivers to drive in intrastate commerce.
- 11. To obtain a copy of your Intrastate Safety Profile contact Lindsay Martin at (360) 664-1244.
- 12. VEHICLE MAINTENANCE BASIC - INSPECTION-REPAIR-MAINTENANCE PROCESS BREAKDOWN: Qualification and Hiring

DESCRIPTION OF PROCESS BREAKDOWN

Seatac 24 management is lacking the necessary training and or experience needed to comply with safety regulations outlined in US Code Title 49.

BASIC SPECIFIC RECOMMENDED REMEDIES

Implement Safety Improvement Practices: The following are recommended practices related to Qualification and Hiring.

- Ensure that prospective employees are qualified to inspect, repair and maintain the carrier's vehicles by querying applicants, checking with previous employers and references, and obtaining necessary documents regarding inspection, repair, and maintenance responsibilities and (for mechanics and technicians) the quality of previous work, including whether maintenance services were systematic and well documented. Create a detailed written record of each inquiry.
- Query the Federal Motor Carrier Safety Administration's (FMCSA) information systems to check the vehicle inspection, repair, and maintenance performance (violations, Out-of-Service [OOS] rates, etc.) of other carriers for whom the mechanic has worked. Then, ask follow-up questions to better determine the mechanic's performance in those previous jobs.
- Verify prospective brake inspectors' understanding of job requirements and their applicable training and apprenticeship credentials.
- Screen prospective dispatchers for flexibility and the ability to deal with crisis by posing "what if" scenarios, such as how they would expedite an emergency repair or a replacement vehicle if given an Out-of-Service (OOS) call on a critical haul.
- Assess prospective drivers' understanding of their responsibility for, and experience with, inspecting and maintaining the vehicle, reporting defects, and verifying repairs.
- Ensure that the employment application captures all information required by Federal Motor Carrier Safety Regulations (FMCSRs) - for example, for drivers, with regard to types of vehicles operated, and for mechanics and technicians, with regard to certification of the ability to perform repairs.
- Enhance the recruitment process to identify and attract qualified applicants for the positions of safety director, mechanic, and other roles with responsibility for inspection, repair, and maintenance, using outside resources such as insurance companies, industry groups, and consultants for employee searches and referrals.
- Verify that mechanics and technicians are familiar with advanced technology and are certified for the vehicles on which they will be working

Seek Out Resources:

- You are encouraged to review your company's record at the following website: <http://ai.fmcsa.dot.gov/SMS>. You will need to use your PIN Number that has been provided by the FMCSA.
- Contact industry associations to get resources and ideas on safety improvement practices from other carriers in the industry.

- 13. HOS COMPLIANCE BASIC PROCESS BREAKDOWN: Qualification and Hiring

DESCRIPTION OF PROCESS BREAKDOWN

Seatac 24 management is lacking the necessary training and or experience needed to comply with safety regulations outlined in US Code Title 49.

BASIC SPECIFIC RECOMMENDED REMEDIES





SEATAC AIRPORT 24 (S. MAHAMA MAUROU dba)
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Part B Requirements and/or Recommendations

Implement Safety Improvement Practices: The following are recommended practices related to Qualification and Hiring.

- Ensure that prospective drivers have a history of driving within Hours-of-Service (HOS) regulations by querying applicants, checking with previous employers and references, and obtaining necessary documents regarding HOS Violations going back three years. Create a detailed written record of each inquiry.
- Ensure that whoever is responsible for monitoring and tracking Hours of Service (HOS) knows the relevant regulations, how the carrier/dispatcher operates, the company's disciplinary policy and procedures, and how to use supporting documents such as toll and fuel receipts to see if data are accurate.
- Ensure that dispatchers have good planning, communication, and simple mathematical skills.
- Ensure that drivers have sufficient planning skills to know when they should be driving and stopping, basic mathematical skills to calculate their hours and miles, and good organizational skills to keep each Record of Duty Status (RODS) up to date continuously by adding information at every stop.
- Ensure that there are enough people to review Hours-of-Service (HOS) data for all drivers, or invest in Electronic On-board Recording (EOBR) for continuous real-time review.
- Enhance the recruitment process to identify and attract qualified applicants for the positions of safety director, driver, and dispatcher, using outside resources such as industry affiliations, recruiters, and consultants for employee searches and referrals.
- When hiring part-time or intermittent drivers with concurrent employment, verify current and recent Records of Duty Status (RODS) as well as prior Hours-of-Service (HOS) Violations.
- Contact industry associations to get resources and ideas on safety improvement practices from other carriers in the industry.





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Part C

Reason for Review: Compliance Review
Planned Action: Out of Service Order

Parts Reviewed Certification:

| | | | | | | | | | | | | | | | | | | |
|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| 325 | 382 | 383 | 387 | 390 | 391 | 392 | 393 | 395 | 396 | 397 | 398 | 399 | 171 | 172 | 173 | 177 | 178 | 180 |
| | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | | | | | | | | |

Prior Reviews Prior Prosecutions

Unsat/Unfit Information

Is the motor carrier of passengers subject to the safety fitness procedures contained in 49 CFR part 385 subpart A, AND does it transport passengers in a commercial motor vehicle?

No

Does carrier transport placardable quantities of hazardous materials?

Unsat/Unfit rule:

Not Applicable

Corporate Contact: Sani Mahama
Corporate Contact Title: Owner

Special Study Information:

Remarks:

INVESTIGATIVE REPORT RECEIVED BY:

Name: Sani Mahama Maurou
Title: Owner
Carrier/Shipper Name: Sani Mahama Maurou dba Seatac Airport 24
Date: 1/22/2016

REASON FOR THE INVESTIGATION:

This compliance investigation of Sani Mahama Maurou dba Seatac Airport 24 (Seatac 24) was assigned to Special Investigator Mathew Perkinson by the Washington State Utilities and Transportation Commission (Commission) as a follow-up to the carrier's initial new entrant visit. Transportation Safety Supervisor John Foster provided assistance during the review.

SCOPE OF THE INVESTIGATION:

A comprehensive investigation was completed. All of the carrier's operations were investigated. No vehicle inspections were conducted.

CARRIER OPERATION DESCRIPTION:

Seatac 24 operates as an intrastate passenger auto transportation carrier. Seatac 24 also operates as an intrastate charter and excursion passenger carrier. Seatac 24 received operating authority from the commission on October 10, 2014. Technical assistance was provided to Seatac 24 on October 9, 2014. Two vehicles were inspected, no violations were noted. Mr. Maurou was present and the commission's "Your Guide to Achieving a Satisfactory Safety Rating" was discussed in great detail.

According to Seatac 24's annual report certification it travelled a total of 15,500 miles in 2014 and reported an annual gross revenue of \$90,000 for the fiscal year ending on December 31, 2014. The report also shows that under its Charter and Excursion operation Seatac 24 has one 10 passenger vehicle. According to the Federal Motor Carrier Safety Administration (FMCSA) website Seatac 24 operated 18,000 miles in 2014 and operated one 9-15 passenger van.





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Part C

While interviewing Mr. Maurou it was determined that in the past 365 days Seatac 24 employed two non-CDL drivers including Mr. Maurou and operated only in Washington State. At least four 9-15 passenger vans were observed with Seatac 24 markings. Mr. Maurou stated that he has a total of four vehicles but two of the vehicle are not used because of a lack of work. Seatac 24 was not involved in any emergency relief efforts or operating under an exemption waiver in the past 365 days.

A complaint was received from the Port of Seattle regarding Seatac 24's operations. On February 12, 2015, in response to the complaint a letter was mailed to Seatac 24 explaining the services that are permitted under its certificate including:

Auto transportation

Only non-stop, scheduled passenger service between:

1. The Westin in downtown Seattle and Seattle-Tacoma International Airport.
2. Snoqualmie Casino and Seattle-Tacoma International Airport.
3. Best Western Sky Valley Inn in Monroe and Seattle-Tacoma International Airport.

Seatac 24 is not authorized to pick-up or drop off passengers at the passenger's residence.

Charter

Seatac 24 may not pick-up and drop-off passengers at the airport if the passenger's only travel purpose is airport transportation. Commission rules define charter service as the transportation of a group of persons who have acquired the use of a motor bus to travel together as a group to a specific destination or for a particular itinerary, for a common purpose and under a single contact. In short, Seatac 24 is not authorized to charter a group of people that have no common goal other than transportation to or from the airport, WAC 480-30-036.

PRE-INVESTIGATION:

In November 2015, an information packet was mailed to the carrier at their PPOB explaining the investigation process, the records that would need to be reviewed and the information the carrier would need to make available. The records and documents that were requested were as follows:

Accident Information:

A list of all accidents for the past 365 days from date of review.

1. Including; driver's full name;
2. Accident date;
3. Number of injuries or fatalities;
4. Number of vehicles towed due to disabling damage.
5. Indicate whether or not driver was cited for a moving violation.

Driver Qualification Files:

Driver qualification files for all drivers used within the past 12 months.

If they had drivers assigned to other locations, be prepared to identify each driver's status.

1. Terminal location;
2. Local vs. long haul;
3. Type of equipment operated;
4. Company or leased.

Insurance & Economic Documentation:

A current copy of valid insurance (MCS-90 insurance endorsement etc.)

A current copy of Form MCS 150.

A current copy of your Washington state authority.

Equipment Maintenance:

All maintenance files and records for each unit, including leased units.

Files and records including evidence of annual inspections, repair receipts, maintenance schedules,

Certifications or qualifications of persons performing annual inspections and brake repair and adjustments.

Copies of driver daily vehicle inspection reports, (DVIR's) for the last three months.





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Part C

Drug and Alcohol Records:

All administrative records related to alcohol and controlled substances testing.

If you are enrolled with a consortium, obtain the current list of drivers for your company.

Other records including:

1. Annual report for previous year;
2. Pre-employment test results for all drivers hired in the last 365 days;
3. Random selection list and test results;
4. Educational materials provided drivers;
5. Company written drug and alcohol policy.

Seatac 24 failed to complete the information packet or submit much of the information requested despite several attempts to gather the information.

CDLIS (DRIVER LICENSE) CHECK:

Seatac 24 does not operate vehicles that requires a commercial driver license. The two drivers currently employed by the carrier were checked through the Washington State Department of Licensing Website and have active driver's licenses.

AUTHORITY

Seatac 24 operates under the USDOT number 2408309. Seatac 24 has intrastate authority through the Commission under Charter Permit number CH-65615. Seatac 24's UBI number is 601938365.

INSURANCE

According to commission records Seatac 24 is insured by Knightbrook Insurance Company (Knightbrook) under policy number LWA-000509-01, liability limit of \$1,500,000. On November 10, 2015, an attempt to contact Knightbrook insurance was made to verify insurance and a voicemail was left. A loss run report for the past three years was requested. A second attempt was made on November 13, 2015. As of November 13, 2015, Knightbrook has not returned the call. See Part 387 for details.

RED FLAG DRIVERS:

No Red Flag Drivers were found during the investigation.

DRUG AND ALCOHOL SUPPLEMENTAL REVIEW

This is a full comprehensive investigation therefore a Drug and Alcohol Supplemental Review was not required.

HAZARDOUS MATERIALS SUPPLEMENTAL REVIEW

Seatac 24 does not transport any hazardous materials.

INVESTIGATION:

Parts 171, 172, 173, 177, 178, 180, & 397 Hazardous Materials

Seatac 24 does not transport any hazardous materials.

Part 376 Lease and Interchange of Vehicles

Seatac 24 does not lease vehicles.

Part 380 Special Training

Seatac 24 does not operate vehicles that required special training.

Part 382 Controlled Substances and Alcohol Use and Testing





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Part C

Seatac 24 does not operate vehicles that require drug and alcohol testing.

Part 383 Commercial Drivers' License

Seatac 24 does not operate vehicles that require a CDL or passenger endorsement.

Part 387 Financial Responsibility

Seatac 24 maintains \$1,500,000 in liability coverage meeting the minimum \$1,500,000 required by Part 387.33 for for-hire carriers of passengers (seating capacity of 15 passengers or less). It was not verified with the insurance carrier if Seatac 24 had any lapses in coverage during the past 365 days or accidents involving fatalities. Seatac 24 failed to maintain at its principal place of business proof of financial responsibility for its vehicles, CFR Part 387.31(d).

Part 390 General

Seatac 24's MCS-150 Form shows the vehicle miles traveled was last updated on March 19, 2014. Mr. Maurou stated that he has not been involved in any accidents.

Part 391 Qualification of Drivers

Seatac 24 was given several opportunities to provide driver qualification files for its drivers. On November 3, 2015, Mr. Maurou provided the following documents:

- Driver Ndow Yankuba - A driving abstract dated October 21, 2015, and an incomplete employment application.
- Driver Sani Maurou - A driving abstract dated May 19, 2014, and a copy of a driver license issued May 11, 2013, with an expiration date of February 7, 2016.
- Driver Mulata Said - A driving abstract pulled on June 29, 2013.

Seatac 24 did not have driver qualification files for the two drivers that operated in the past 365 days, CFR Part 391.51(a). The carrier is a small size carrier (20 or less drivers) and the number of medical examiners certificates to be checked is not less than 25% of the sample size of two, one medical examiners certificate (MEC). A MEC for Mr. Yankuba was requested. Seatac 24 failed to provide a MEC for Mr. Yankuba. It was determined that neither Mr. Yakuba nor Mr. Maurou have a MEC.

The Motor Carrier Safety Enforcement Policy (MCSEP) states a carrier that allows an employee to drive without a current MEC is subject to mandatory penalties each time the driver drove up to six months. It is the policy of the Transportation Safety section to review violations related to keeping the public safe from unqualified drivers, such as a driver without a current MEC for each day a driver drove up to six months.

Time records provided by Mr. Maurou show that Seatac 24 allowed Mr. Yankuba to operate a commercial motor vehicle as defined in CFR Part 390.5 on 114 separate occasions from May 3, 2015, to November 3, 2015 (six months) while not medically certified. The records show Mr. Maurou operated a commercial motor vehicle on 133 occasions for the same period, while not medically certified, CFR Part 391.45(b)(1).

Six months was reviewed for each driver, a total of 360 days. A total of 247 violations were discovered.


Part 392 Driving of CMV's and Authority

Seatac 24 is not required to pay Unified Carrier Registration fees because it only operates in intrastate commerce. No violations were discovered.

Part 395 Hours of Service

Per eFOTM the records of duty status for two drivers employed by Seatac 24 were required to be reviewed for a period of 30 days. Drivers selected for review were Mr. Maurou and Mr. Yankuba. Seatac 24 operates seven days a week under the 70 hour rule and qualifies for the short haul 100 air-mile exemption. Seatac 24 is required to maintain and retain for a period of six months accurate and true time records showing the time the driver reports for duty each day, the time the driver is released from duty each day, and the total number of hours the driver is on duty each day.



| | | |
|--|---|------------------------------------|
|  <p>UTC U.S. DOT # 2408309</p> | <p>SEATAC AIRPORT 24 (S. MAHAMA MAUROU dba) U.S. DOT #: 2408309</p> | <p>Review Date: 01/22/2016</p> |
| Part C | | |

Seatac 24 was asked to gather hours of service records a week before the scheduled compliance review on November 3, 2015. On November 3, 2015, time records were requested. Mr. Maurou explained he had some records but they were not legible. Staff reviewed what was provided and determined the records did not meet the requirement outlined in CFR Part 395.8(a). Mr. Maurou said he would clean up his records and provide them the following day. He failed to provide the records the following day. Staff made several attempts to obtain the records and Seatac 24 missed multiple deadlines to provide them. On November 13, 2015, Mr. Maurou provided time records for himself and Mr. Yankuba for the period of May 1, 2015, through November 12, 2015.

Part 393 & 396 Maintenance and Inspection

Seatac 24 operates a total of two 9-15 passenger vans. Maintenance files were required to be checked on both vehicles. Seatac 24 failed to keep minimum records of inspection and vehicle maintenance on either vehicle, CFR Part 396.3(b).

A document created by Seatac 24 states oil changes, tire rotations and "General maintenance" were done on March 1, July 1, and September 1, 2015 by "Neighbor Mechanic." The document does not identify which vehicle received maintenance.

Seatac 24 failed to provide documentation showing that the vehicle had been periodically inspected since October 9, 2014, when the commission inspected the vehicles. According to the records provided by Mr. Maurou Seatac 24 operated at least one of the two vehicles while not having a valid periodic inspection during the month of November 2015. The records of duty status show that Mr. Maurou operated on at least nine occasions, CFR Part 396.17(a).

60 Daily Vehicle Inspection Reports (DVIR's) were required to be checked. The DVIR's of two units were requested. While interviewing Mr. Maurou it was determined that Seatac 24 does not complete DVIR's. Mr. Maurou explained that his driver looks the vehicle over once a week. As previously mentioned, Mr. Maurou was informed during staff's prior visit that Seatac 24 is required to complete DVIR's for each day a vehicle is operated. Records provided (following the scheduled in-person meeting) show Mr. Yankuba operated a commercial motor vehicle on 19 separate occasions in October 2015 as follows: 10/1, 10/2, 10/4, 10/5, 10/7, 10/8, 10/10, 10/11, 10/13, 10/14, 10/18, 10/19, 10/23, 10/24, 10/26, 10/27, 10/29, 10/30, and 10/31. Driver Sani Maurou operated a commercial motor vehicle on at least 22 separate occasions in October 2015 as follows: 10/1, 10/2, 10/3, 10/4, 10/5, 10/8, 10/9, 10/10, 10/11, 10/12, 10/13, 10/16, 10/17, 10/18, 10/19, 10/20, 10/21, 10/25, 10/26, 10/27, 10/28, and 10/29.

Seatac 24 failed to require its drivers to complete DVIR's on any of the days, CFR Part 396.11(a).

No vehicle inspection were conducted.

CLOSING INTERVIEW

The closing was conducted at the carrier's PPOB on January 22, 2016. Present at the closing was Special Investigator Mathew Perkinson, Transportation Safety Supervisor John Foster and Mr. Sani Maurou. The violations were discussed at length and the actions Seatac 24 would need to take to come into full compliance. The carrier was informed that a penalty assessment will be pursued. This review resulted in a proposed Unsatisfactory rating.

DOCUMENTS GIVEN TO THE CARRIER

Seatac 24 was provided with websites where information about the investigation and helpful carrier information could be located, a copy of the UTC safety guide "Your Guide to Achieving a Satisfactory Safety Rating" and has access to the FMCSA's website via the Internet. The "How to request an Upgrade" worksheet and the Fitness Rating Explanation worksheet were also provided.

FOLLOW-ON ACTION:

Penalties will be assessed for CFR Part 391.45(b)(1), 391.51(a), 396.3(b), and 396.11(a). Seatac 24 will have 45 days from the date of the closing interview to complete the requirements outlined in the "How to request an Upgrade" worksheet





SEATAC AIRPORT 24 (S) MAHAMA MAUROU dba
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| Upload Authorized: | Yes | No | |
| Authorized by: | | | Date: |
| Uploaded: | Yes | No | Failure Code: |
| Verified by: | | | Date: |





SEATAC AIRPORT 24 (S. J MAHAMA MAUROU dba)
U.S. DOT #: 2408309

State #: C-65615

Review Date:
01/22/2016

Safety Fitness Rating Explanation

This report lists the facts which were used to determine the Safety Fitness Rating for the above motor carrier. Federal and State violations are combined for rating purposes. However, only the federal or federal equivalent section number is shown below. A check mark identifies the range within which the data fell when determining the Safety Fitness Rating. All information within a FACTOR block relates only to that FACTOR.

| | | | | |
|--|--------------|--|-----|--|
| FACTOR 1 | | General (CFR Parts 387, 390) | | √ 0 Point = Satisfactory |
| VIOLATIONS AFFECTING RATING | | POINTS | | 1 Point = Conditional |
| NONE | | | | >1 Point = Unsatisfactory |
| TOTAL POINTS: | | 0 = SATISFACTORY | | |
| FACTOR 2 | | Driver Qualification (CFR Parts 382, 383, 391) | | 0 Point = Satisfactory |
| VIOLATIONS AFFECTING RATING | | POINTS | | 1 Point = Conditional |
| S | 391.45(b)(1) | 1 | (C) | √ >1 Point = Unsatisfactory |
| S | 391.51(a) | 1 | (C) | |
| TOTAL POINTS: | | 2 = UNSATISFACTORY | | |
| FACTOR 3 | | Operational/Driving (CFR Parts 392, 395) | | √ 0 Point = Satisfactory |
| VIOLATIONS AFFECTING RATING | | POINTS | | 1 Point = Conditional |
| NONE | | | | >1 Point = Unsatisfactory |
| TOTAL POINTS: | | 0 = SATISFACTORY | | |
| FACTOR 4 | | Vehicle/Maintenance (CFR Parts 393, 396, Performance Data (OOS%)) | | |
| VIOLATIONS AFFECTING RATING | | POINTS | | Fewer than 3 inspections |
| S | 396.3(b) | 1 | (C) | |
| S | 396.11(a) | 1 | (C) | |
| TOTAL POINTS: | | 2 = UNSATISFACTORY | | |
| Fewer than 3 Inspections | | 3 or more Inspections | | |
| Rate same as other Regulatory Factors 1, 2, and 3 | | OOS Less than 34% | | OOS 34% or Higher |
| 0 Point = Satisfactory | | Satisfactory | | Conditional |
| 1 Point = Conditional | | Conditional | | Unsatisfactory |
| √ >1 Point = Unsatisfactory | | If a pattern of Non-Compliance with a Critical or an Acute Violation | | If a pattern of Non-Compliance with a Critical or an Acute Violation |
| FACTOR 5 | | Hazardous Material (CFR Parts 397, 171, 172, 173, 177, 180) | | |
| Not Applicable - Not a carrier of Hazardous Material | | | | |
| NONE | | | | |
| FACTOR 6 | | Accident (Recordable Accident Rate) | | |
| ((Recordable Accidents) X (1 million)) ÷ (Total Miles) = Rate | | | | |
| (0 X 1,000,000) ÷ 18,000 = 0 = SATISFACTORY | | | | |
| URBAN CARRIER - All Driver operate within <100 air miles | | | | |
| ACCIDENT RATE | | FACTOR RATING | | |
| √ 0.000 - 1.700 = | | Satisfactory | | |
| >1.700 = | | Unsatisfactory | | |





SEATAC AIRPORT 24 (S. J. MAHAMA MAUROU dba)
 U.S. DOT #: 2408309

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Safety Fitness Rating Explanation

OVERALL SAFETY FITNESS RATING

Number of Factors (1-6) shown above as less than satisfactory

Unsatisfactory

Conditional

2

0

= UNSATISFACTORY

FORMULA TO CALCULATE THE OVERALL SAFETY FITNESS RATING

Number of Factors

| Number of Factors | | OVERALL RATING |
|-------------------|-------------|----------------|
| Unsatisfactory | Conditional | |
| 0 | 2 or fewer | Satisfactory |
| 0 | 3 or more | Conditional |
| 1 | 2 or fewer | Conditional |
| 1 | 3 or more | Unsatisfactory |
| √ 2 | 0 or more | Unsatisfactory |



How to request an upgrade to your INTRASTATE safety rating

You have been assessed a proposed safety rating of UNSATISFACTORY, if you fail to obtain an improved rating within 45 days from the receipt of your proposed rating, the unsatisfactory rating will become final and you must cease operations.

The Washington Utilities and Transportation Commission (UTC) allows motor carriers to request an upgrade of its safety rating based on corrective action as defined in 49 CFR, section 385.17. The request for an upgrade must include a written description of correction actions taken, documentation of these corrective actions, and an explanation of how its operations meet the safety standards and factors specified in 49 CFR sections 385.5 and 385.7.

Within 15 days from the receipt of your proposed rating, you may request, in writing, a change to your safety rating based on corrective actions. You should do so as soon as possible so the UTC has the opportunity to review and evaluate your safety management plan before the effective date of the final safety rating. **If you fail to obtain an improved rating within 45 days from the receipt of your proposed rating, the unsatisfactory rating will become final and you must cease operations.**

You must develop a safety management plan:

1. The plan must address each acute, critical, or serious violation on the most recent Compliance Review. Corrective actions to address other violations noted on your review must also be included.
2. Identify why the violations were permitted to occur.
3. Discuss the actions taken to correct the deficiency or deficiencies that allowed the violations to occur. Include actual documentation of this corrective action. (For example: documentation may include items such as new policies and procedures, training programs and sign-in lists, or copies of new forms.
4. Outline actions taken to ensure that similar violations do not reoccur in the future. **YOU MUST DEMONSTRATE THAT YOUR OPERATIONS CURRENTLY MEET THE SAFETY STANDARD AND FACTORS SPECIFIED IN 49 CFR 385.5 and 385.7.** To do so, you must demonstrate that you now have adequate safety management controls in place which function effectively to ensure acceptable compliance with applicable safety requirements.
5. If your request includes actions that will be conducted in the near future, such as training, reorganization of departments, purchasing of computer programs, etc, include a detailed description of the activity or training and a schedule of when that activity will commence and when it will be completed.
6. Include any additional documentation relating to motor carrier safety and the prevention of crashes that you believe supports your request.
7. Include a written statement certifying the carrier will operate within federal and state regulations and the carrier's operation currently meets the safety standard and factors specific in 49 CFR 385.5 and 385.7. A corporate officer, partner, or the owner of the company must sign the statement.

You must submit your request to:

Mathew Perkinson
WA Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
PO Box 47250
Olympia, WA 98504-7250

Optional Checklist for Safety Rating Upgrade Request Based on Corrective Action Passenger Carriers

At a minimum, the following must be addressed:

- All violations listed on the investigation
- An out of service rate 34% or more as listed on the compliance review
- Or UNSATISFACTORY crash rate as listed on the compliance review
- Any new OOS violations cited at the roadside since the compliance review or roadside violations related to those critical and/or acute violations cited in the compliance review
- How your corrective actions will improve your safety performance, including data captured by FMCSA's Safety Management System.
- Provide a list of all drivers used in the past 12 months. Include hire and termination dates, license numbers and dates of birth for each driver.

Medical Certificates –

49 CFR §391.45(b)(1) - Using a driver not medically examined and certified during the preceding 24 months. (Critical)

- Explain what safety management processes are broken or missing that allowed this violation/pattern to occur
- If your company has been cited with this or a similar violation (in the same Part) in the past, explain why any corrective action you took previously was unsuccessful in preventing additional violations
- Explain remedies (corrective action) implemented to prevent future violations
- Identify position responsible for ensuring compliance with these procedures
- Describe the documentation submitted as evidence of this corrective action
- Examples of documentation may include:
 - Copy of medical examiner's certificates.
 - Procedures to monitor medical certificate expiration dates and medical re-qualification/conditions

Driver Qualification File and Documents –

49 CFR §391.51(a) – Failing to maintain driver qualification file on each driver employed (Critical), and

- Explain what safety management processes are broken or missing that allowed this violation/pattern to occur
- If your company has been cited with this or a similar violation (in the same Part) in the past, explain why any corrective action you took previously was unsuccessful in preventing additional violations
- Explain remedies (corrective action) implemented to prevent future violations
- Identify position responsible for ensuring compliance with these procedures
- Describe the documentation submitted as evidence of this corrective action
- Examples of documentation may include:
 - Complete driver qualification files.
 - Inquiries into drivers' driving records.
 - Copy of medical examiner's certificates.

Optional Checklist for Safety Rating Upgrade Request Based on Corrective Action Passenger Carriers

No Maintenance Files –

49 CFR §396.3(b) – Failing to keep minimum records of inspection and vehicle maintenance (Critical).

- Explain what safety management processes are broken or missing that allowed this violation/pattern to occur
- If your company has been cited with this or a similar violation (in the same Part) in the past, explain why any corrective action you took previously was unsuccessful in preventing additional violations
- Explain remedies (corrective action) implemented to prevent future violations
- Identify position responsible for ensuring compliance with these procedures
- Describe the documentation submitted as evidence of this corrective action
- Examples of documentation may include:
 - o Complete maintenance records that include:
 - o The identification of the vehicle including company number, if so marked, make, serial number, year, and tire size
 - o If the motor vehicle is not owned by the motor carrier, identify the name of the person furnishing the vehicle
 - o Evidence of recording a means to indicate the nature and due date of the various inspection and maintenance operations to be performed
 - o Evidence of inspection, repairs, and maintenance indicating their date and nature
 - o If applicable, a record of tests conducted on push-out windows, emergency doors, and emergency door marking lights on buses (every 90 days)

Daily Vehicle Inspection Reports –

49 CFR §396.11(a) – Failing to require driver to prepare driver vehicle inspection report (Critical), and

- Explain what safety management processes are broken or missing that allowed this violation/pattern to occur
- If your company has been cited with this or a similar violation (in the same Part) in the past, explain why any corrective action you took previously was unsuccessful in preventing additional violations
- Explain remedies (corrective action) implemented to prevent future violations
- Identify position responsible for ensuring compliance with these procedures
- Describe the documentation submitted as evidence of this corrective action
- Examples of documentation may include:
 - o Evidence that driver vehicle inspection reports (DVIRs) were submitted by drivers for a 30-day period
 - o Evidence that defects or deficiencies reported on the DVIRs were repaired
 - o Instructions provided to management staff, mechanics and drivers on company procedure to report, repair any defects or deficiencies and certify defects or deficiencies have been repaired for vehicles