## TH-220108



Mr. Jeff Killip Executive Director and Secretary State of Washington UTC 621 Woodland Square Loop SE Lacey, WA 68503 Received Records Management Oct 9, 2024

October 9th, 2024

Re: Renzenberger, Inc. DBA Hallcon

Docket# TH-220108

Mr. Killip,

I received your letter dated 10/4/2024. We reviewed the UTC staff's assessment and provided additional documentation to reduce the number of violations from 66 to 6. The UTC staff have revised the report to reflect the updated number of violations.

We apologize for the delay in providing our documentation to the UTC staff. Prior to the UTC driver file audit, our compliance manager(7 years with Hallcon) departed the company and the new compliance supervisor had a challenging time locating the documents internally(and providing them timely to the UTC staff). I apologize for this issue and we are working to ensure our document retention and organization are improved going forward.

With regards to the 6 violations, we are unable to dispute these violations. When I questioned our driver why she did not renew her DOT Cert in time, she indicated the physician that issued her prior DOT certificate stopped performing DOT exams and it took her several weeks(over the holidays 2023) to find another doctor.

Although we are still in violation of the prior agreement, I would ask the state to please reconsider enforcing the suspended penalty due to the circumstances outlined above.

Thank you for your consideration and please call me if you would like to discuss.

Mark Knickerbocker, AIC, AINS, AIS Assistant Vice President, Safety & Risk Management

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