



Basalt Pacific Transport LLC

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October 19, 2022

Utilities and Transportation Commission, State of Washington

RE: Petition to Request an Exemption from WAC 480-14-250(1) via consideration of the requirements listed under RCW 48.15.040

Dear Amanda Maxwell, Executive Secretary,

I write to petition the commission for an exemption from WAC 480-14-250(1), which requires common carriers to have an insurance policy written by a company authorized to offer such insurance in Washington. I make this request on behalf of my mobile home transportation company Basalt Pacific Transport (BPT) LLC. The reason for my request is that I could not obtain an insurance policy offer from any of the admitted insurance carriers in Washington given our niche market and record of multiple violations (though no crashes). To keep our business operational, and after several weeks of due diligence effort by two insurance brokers, we received only one offer from Prime Insurance Company (Rick J. Lindsey) for Evolution Insurance Brokers, licensed by the Office of the Insurance Commissioner to produce surplus lines policies. A due diligence search was also performed by our former broker at Affordable Home Services for Milford Casualty Insurance Company for all of the major carriers who could write coverage for mobile home transporters (i.e., American Trust, Northland, Canal, National Indemnity, Progressive, and Berkshire Hathaway). Documentation of these due diligence searches was provided to Patrick Remfrey via email.

Context for this request is as follows. BPT is a new transportation company that was formed to transport mobile homes that are repaired and refurbished as part of another family business. Because we were new to the transportation business, we did not appreciate (1) that the mobile home transportation business is an extremely high risk transportation industry that is heavily monitored; (2) why or how to be proactive and keep our CSA score low; (3) how to mine and improve our CSA score; and (4) how to monitor negative roadside inspection reports that were not provided to us by our (former) CDL drivers, which eliminated the possibility of making timely improvements/repairs for subsequent inspections. We also (5) didn't know that we could request corrections of bad data via a DataQ RDR and (6) we mistakenly loaned a truck to an outside driver to help him with his business, only to find out later that this driver had accrued multiple violations that lowered our CSA score. Since working with our ELD provider (JJ Keller) and the Risk Management team of our new insurance policy company at Prime Insurance, we are learning how to make improvements in each of these areas. It is our understanding that Prime Insurance writes policies for companies like ours that have fallen into the high-risk category to help them learn how to manage their risks, significantly improve their CSA score, and transition back into a lower-risk status so that within 1-2 years they will be eligible for an insurance policy via any of the major admitted insurance carriers for their niche market. Such a milestone is indeed a major compliance, safety, and accountability goal for our young woman-owned company.

If you need further information, please contact me at (360) 670-7706.

Regards,



Sherry L Cady, Owner
Basalt Pacific Transport LLC