



Bob Ferguson

ATTORNEY GENERAL OF WASHINGTON

Utilities and Transportation Division

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March 1, 2016

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

RE: *In the Matter of the Investigation of Sani Mahama Maurou d/b/a Seatac Airport 24
for Compliance with WAC 480-30-221
Docket TC-152296*

Dear Mr. King:

Enclosed for filing in the above-referenced docket are the original and one copy of Commission Staff's Response to the Company's Proposed Safety Management Plan and Request for Permission to Make Additional Filing (by 3:00 p.m. on Friday, March 4, 2016), and Certificate of Service.

Sincerely,

ANDREW J. O'CONNELL
Assistant Attorney General

AJO/emd

Enclosure

cc: Seatac Airport 24 w/enc.

BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

In the Matter of the Investigation of

SANI MAHAMA MAUROU d/b/a
SEATAC AIRPORT 24

For Compliance with WAC 480-30-221

DOCKET TC-152296

COMMISSION STAFF'S RESPONSE
TO SANI MAHAMA MAUROU d/b/a
SEATAC AIRPORT 24'S PROPOSED
SAFETY MANAGEMENT PLAN OF
FEBRUARY 26, 2016

AND

REQUEST FOR PERMISSION TO
MAKE ADDITIONAL FILING
(by 3:00 p.m. on Friday, March 4, 2016)

1 On February 9, 2016, the Washington Utilities and Transportation Commission (“Commission”) issued a Notice of Intent to Cancel Certificate as an Auto Transportation Carrier and Notice of Brief Adjudicative Proceeding; Setting Time for Oral Statements in Docket TC-152296, In the Matter of the Investigation of Sani Mahama Maurou d/b/a SeaTac Airport 24 For Compliance with WAC 480-30-221 (“Notice”). The Notice set the Brief Adjudicative Proceeding (“BAP”) for March 1, 2016, at 9:30 a.m., and required SeaTac Airport 24 to submit its proposed safety management plan no later than 5:00 p.m. on Friday, February 26, 2016.

2 On February 11, 2016, the Commission issued a Notice Rescheduling Brief Adjudicative Proceeding and Notice Requiring Staff Response, granting Commission Staff’s (“Staff”) Motion for Continuance of Brief Adjudicative Proceeding and rescheduling the BAP on March 7, 2016, at 9:30 a.m. This Notice also required Staff to file a response to Sani Mahama Maurou d/b/a SeaTac Airport 24’s (the “Company”) proposed safety

management plan by 5:00 p.m. on Tuesday, March 1, 2016. Staff, therefore, files this Response.

3 Staff did not receive a proposed safety management plan from the Company by 5:00 p.m. on Friday, February 26, 2016. Staff bases this Response on the Company's failure to submit a proposed safety management plan by the time prescribed by the Commission.

4 Based only upon the absence of any safety management plan on Friday, February 26, 2016, Staff would be compelled to recommend that the Commission cancel Seatac Airport 24's Charter, Excursion, and Auto Transportation operating authority (Permit C-65615) effective Tuesday, March 8, 2016.

5 However, Staff received a proposed safety management plan from the Company in the late afternoon of Monday, February 29, 2016. While this submission by the Company came too late for Staff to include an evaluation in this Response, it is Staff's position that a proper, full, and thorough evaluation of the Company's proposed safety management plan is necessary in order to make a final recommendation to the Commission.

6 Considering that Staff's investigators are available only intermittently due to their participation in mandatory training between March 1-3, 2016, Staff is unable to make a final, comprehensive recommendation to the Commission today. Staff respectfully requests that it be permitted to file a memorandum containing its comprehensive recommendation by 3:00 p.m. on Friday, March 4, 2016.

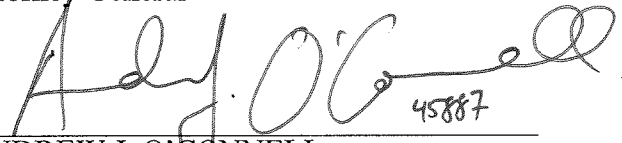
7 Staff believes there is good cause to permit the requested filing because it would allow Staff the time necessary to evaluate the Company's plan of February 29, 2016. Staff does not believe that any party or the Commission will be prejudiced by Staff's requested filing because an evaluation of the plan submitted on February 29, 2016, could be more

favorable to the Company than a recommendation based upon the absence of any filed plan by February 26, 2016, and the Commission would benefit from being fully informed of Staff's comprehensive recommendation regarding the Company's proposed safety management plan prior to the BAP on March 7, 2016.

DATED March 1, 2016.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General

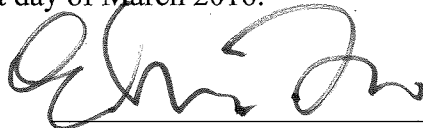
A handwritten signature in black ink, appearing to read "A. J. O'Connell", with the number "45887" written below the signature.

ANDREW J. O'CONNELL
Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff

Docket TC-152296
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the enclosed Response to Proposed Safety Management Plan and Request for Permission to Make Additional Filing upon the persons and entities listed on the Service List below via United States mail, addressed as shown below.

DATED at Olympia, Washington this 1st day of March 2016.



ELIZABETH M. DEMARCO

For Seatac Airport 24:

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