



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

November 14, 2016

Chris R. Miller
Silver Limousine
117 NW 189th Street
Ridgefield, WA 98642

Re: Charter/Party Bus Services

Dear Mr. Miller:

The Washington Utilities and Transportation Commission (Commission) believes that Silver Limousine is engaged in passenger transportation services that may require a certificate of authority from the Commission. The purpose of this letter is to learn more about the transportation services your company offers and to provide technical assistance with regard to Washington's passenger transportation licensing requirements.

One or more of the vehicles depicted on your company website are party bus or charter vehicles as defined in WAC 480-30-036 which requires a certificate of authority from the Commission. These vehicles, by definition, cannot be licensed as limousines. Advertising these services without the required certificate is illegal, is considered a gross misdemeanor, and is punishable as such (see RCW 81.70.220 and WAC 480-30-246).

To avoid enforcement action by the Commission, no later than December 5, 2016, please either:

- Submit a completed application, file proof of insurance and include the application fee. For questions about the application process, please contact our Licensing Services staff at (360) 664-1222.

OR

- Explain in writing why you believe your business does not require passenger transportation authority from the Commission. Please explain the nature of your company's operations in detail. Direct your written response to Mr. Michael Turcott, Compliance Investigator, Transportation Safety, at PO Box 47250, Olympia, WA 98504-7250 or by email at miturcot@utc.wa.gov.

If you have further questions or comments about our findings, Mr. Turcott may also be reached at (360) 664-1174.


Sincerely,

David Pratt
Assistant Director, Transportation Safety


Enclosure

cc: Ms. Jody Sisk, Limousine Manager, Department of Licensing


UNITED STATES DEPARTMENT OF TRANSPORTATION

	US DOT # 3085952	Legal: SILVER TRANSPORTATION	
		Operating (DBA): SILVER LIMOUSINE	
MC/MX #: 69261		Federal Tax ID: 27-4706971 (EIN)	
Review Type: Compliance Review (CR)			
Scope: Principal Office	Location of Review/Audit: Company facility in the U. S.		Territory:
Operation Types		Business: Partnership	
Carrier: Non-HM Non-HM	Gross Revenue:		for year ending:
Shipper: N/A N/A			
Cargo Tank: N/A			
Company Physical Address:			
117 NW 189TH ST RIDGEFIELD, WA 98642			
Contact Name: Chris Miller			
Phone numbers: (1) 360-606-3861		(2) 503-336-0566	Fax: 866-299-5406
E-Mail Address: pdxlimo@gmail.com			
Company Mailing Address:			
117 NW 189TH ST RIDGEFIELD, WA 98642-5777			
Carrier Classification			
Authorized for Hire			
Cargo Classification			
Passengers			
Equipment			
	Owned	Term Leased	Trip Leased
Minibus, 16+	0	1	0
Limousine, 16+	1	0	0
	Owned	Term Leased	Trip Leased
Limousine, 9-15	1	1	0
Power units used in the U.S.: 4			
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:	5	0	Total Drivers: 5
>= 100 Miles:	0	0	CDL Drivers: 1



	SILVER LIMOUSINE (SILVER TRANSPORTATION dba) U.S. DOT #: 3085952	Review Date: 02/28/2018				
Part A						
<p>Questions about this report or the Federal Motor Carrier Safety or Hazardous Materials regulations may be addressed to the Federal Motor Carrier Safety Administration at:</p> <p style="text-align: center;">2424 Heritage Ct., SW, Suite 302 Olympia, WA 98502-6031 Phone: (360)753-9875 Fax:(360)753-9024</p>						
This report will be used to assess your safety compliance.						
<u>Person(s) Interviewed</u> <table data-bbox="134 693 1485 772"><tr><td data-bbox="134 693 876 724">Name: Chris Miller</td><td data-bbox="876 693 1485 724">Title: Owner</td></tr><tr><td data-bbox="134 724 876 772">Name: Wendy Stevens</td><td data-bbox="876 724 1485 772">Title: General Manager</td></tr></table>			Name: Chris Miller	Title: Owner	Name: Wendy Stevens	Title: General Manager
Name: Chris Miller	Title: Owner					
Name: Wendy Stevens	Title: General Manager					



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Part B Violations

1 FEDERAL ACUTE	Primary: 382.115(a)	Dis covered	Checked	Drivers/Vehicles In Violation	Checked
		1	1	0	0

Description
Failing to implement an alcohol and/or controlled substances testing program on the date the employer begins commercial motor vehicle operations.

Example
Driver name, Alec Tiffany-Higley
Trip date, November 14, 2017
Vehicle description, 2000 Ford Excursion with seating for 16+ including the driver.
Violation description, the motor carrier's driver operated a commercial motor vehicle that required a CDL without implementing a controlled substances and alcohol testing program.

2 FEDERAL ACUTE	Primary: 383.37(a)	Dis covered	Checked	Drivers/Vehicles In Violation	Checked
		2	5	2	5

Description
Allowing, requiring, permitting, or authorizing a driver to operate a CMV during any period in which the driver does not have a current CLP or CDL or does not have a CLP or CDL with the proper class or endorsements. An employer may not use a driver to operate a CMV who violates any restriction on the driver's CLP or CDL.

Example
Driver name, Alec Tiffany-Higley
Trip date, November 14, 2017
Vehicle description, 2000 Ford Excursion with seating for 16+ including the driver.
Violation description, the motor carrier allowed their driver to operate their commercial motor vehicle that required a CDL when the driver did not have a CDL.


Driver name, Ken Cordell
Trip date, September 27, 2017
Vehicle description, 2008 Chevy Mini Bus with seat for more than 16 including the driver.
Violation description, the motor carrier allowed their driver to operate a commercial motor vehicle that required a CDL when the driver did not have a CDL.

3 FEDERAL ACUTE	Primary: 387.31(a)	Dis covered	Checked	Drivers/Vehicles In Violation	Checked
		1	1	0	0

Description
Operating a passenger carrying vehicle without having in effect the required minimum levels of financial responsibility.

Example
Driver name, Alec Tiffany-Higley
Trip date, November 16, 2017
Vehicle description, 2000 Ford Excursion with seating for 16+ including the driver.
Violation description, the motor carrier allowed their commercial motor vehicle, with seating for more than 16 including the driver, to be operated on a public roadway without the required minimum of \$5,000,000.00 in liability coverage.



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Part B Violations

4 FEDERAL CRITICAL	Primary: 391.51(a)	Discovered 4	Checked 5	Drivers/Vehicles In Violation 4	Checked 5
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Description
 Failing to maintain driver qualification file on each driver employed.
 Driver name, Alec Tiffany-Higley
 Trip date, December 15, 2017
 Violation description, the motor carrier did not maintain a driver qualification file on their driver as required.

Driver name, Ken Cordell
 Trip date, September 27, 2017
 Violation description, the motor carrier did not maintain a driver qualification file on their driver as required.

Driver name, Brent Torson
 Trip date, December 14, 2017
 Violation description, the motor carrier did not maintain a driver qualification file on their driver as required.

Driver name, Patrick Mittlestedter
 Trip date, December 04, 2017
 Violation description, the motor carrier did not maintain a driver qualification file on their driver as required.

5 FEDERAL CRITICAL	Primary: 395.8(a)(1)	Discovered 20	Checked 22	Drivers/Vehicles In Violation 5	Checked 5
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Description
 Failing to require a driver to prepare a record of duty status using appropriate method

Example
 Driver name, Alec Tiffany-Higley
 Trip date, November 14, 2017
 Violation description, the motor carrier did not required their driver to complete a record of duty status as required.


Driver name, Chris Miller
 Trip date, September 23, 2017
 Violation description, the motor carrier did not required their driver to complete a record of duty status as required.

Driver name, Ken Cordell
 Trip date, September 27, 2017
 Violation description, the motor carrier did not required their driver to complete a record of duty status as required.

Driver name, Brent Torson
 Trip date, December 07, 2017
 Violation description, the motor carrier did not required their driver to complete a record of duty status as required.

Driver name, Patrick Mittlestedter
 Trip date, December 04, 2017
 Violation description, the motor carrier did not required their driver to complete a record of duty status as required.



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Part B Violations

6 FEDERAL CRITICAL	Primary: 396.3(b)	Discovered 3	Checked 4	Drivers/Vehicles In Violation 3	Checked 4
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Description

Failing to keep minimum records of inspection and vehicle maintenance.
 Driver name, Alec Tiffany-Higley
 Trip date, December 15, 2017
 Vehicle description, 2000 Ford Excursion
 Violation description, the motor carrier did not maintain the minimum records of inspection and vehicle maintenance as required.

Driver name, Ken Cordell
 Trip date, September 27, 2017
 Vehicle description, 2008 Chevrolet Eldorado
 Violation description, the motor carrier did not maintain the minimum records of inspection and vehicle maintenance as required.

Driver name, Brent Torson
 Trip date, December 14, 2017
 Vehicle description, 2006 Hummer H2
 Violation description, the motor carrier did not maintain the minimum records of inspection and vehicle maintenance as required.

7 FEDERAL CRITICAL	Primary: 396.11(a)	Discovered 13	Checked 13	Drivers/Vehicles In Violation 2	Checked 4
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Description

Failing to require driver to prepare driver vehicle inspection report.

Example
 Driver name, Alec Tiffany-Higley
 Trip date, December 12/2017
 Vehicle description, 2006 Hummer H2
 Violation description, the motor carrier did not require their driver to prepare a driver vehicle inspection report as required.

Driver name, Alec Tiffany-Higley
 Trip date, December 15, 2017
 Vehicle description, 2000 Ford Excursion
 Violation description, the motor carrier did not require their driver to prepare a driver vehicle inspection report as required.



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Part B Violations

8 FEDERAL CRITICAL	Primary: 396.17(a)	Discovered 4	Checked 4	Drivers/Vehicles In Violation 4	Checked 4
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Description

Using a commercial motor vehicle not periodically inspected.
 Driver name, Alec Tiffany-Higley
 Trip date, November 14, 2017
 Vehicle description, 2000 Ford Excursion
 Violation description, the motor carrier did not require their commercial motor vehicle to be periodically inspected in the previous twelve months.

Driver name, Chris Miller
 Trip date, September 23, 2017
 Vehicle description, 2007 Chrysler 300
 Violation description, the motor carrier did not require their commercial motor vehicle to be periodically inspected in the previous twelve months.

Driver name, Ken Cordell
 Trip date, September 27, 2017
 Vehicle description, 2008 Chevrolet Eldorado
 Violation description, the motor carrier did not require their commercial motor vehicle to be periodically inspected in the previous twelve months.

Driver name, Brent Torson
 Trip date, December 14, 2017
 Vehicle description, 2006 Hummer H2
 Violation description, the motor carrier did not require their commercial motor vehicle to be periodically inspected in the previous twelve months.

9 FEDERAL	Primary: 376.11(a)	Discovered 2	Checked 4	Drivers/Vehicles In Violation 2	Checked 4
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Description


Failure to use a written lease agreement to lease equipment.

Example

Driver name, Alec Tiffany-Higley
 Trip date, December 12, 2017
 Vehicle description, Black Hummer H2
 Violation description, motor carrier operated a commercial motor vehicle it does not own without a written lease agreement from the register owner.

Driver name, Kenneth Cordell
 Vehicle description, 2008 Cheverolet Eldorado
 Violation description, motor carrier operated a commercial motor vehicle it does not own without a written lease agreement from the register owner.



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Part B Violations

10 FEDERAL	Primary: 390.19(b)(1)	Discovered 1	Checked 1	Drivers/Vehicles In Violation 0	Checked 0
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Description
Failing to file the appropriate form under 390.19(a) (MCS-150, 150B, or 150C) before beginning operations.
Driver name, Alec Tiffany-Higley
Trip date, December 12, 2017
Vehicle description, Black Hummer H2
Violation description, motor carrier operated a commercial motor vehicle before filing the appropriate MCS-150 form.

11 FEDERAL	Primary: 392.9a(a)(1)	Discovered 1	Checked 1	Drivers/Vehicles In Violation 0	Checked 0
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Description
Operating without the required authority (Passengers).
Example
Driver name, Alec Tiffany-Higley
Trip date, November 16, 2017
Violation description, the motor carrier operated as a for-hire passenger carrier without any operating authority.

12 FEDERAL	Primary: 392.9b(a)	Discovered 1	Checked 1	Drivers/Vehicles In Violation 0	Checked 0
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Description
Operating a CMV in interstate commerce without USDOT Registration.
Example
Driver name, Alec Tiffany-Higley
Trip date, December 15, 2017
Violation description, the motor carrier allowed their commercial motor vehicles to be operated without first obtaining a USDOT number.

Safety Fitness Rating Information:	OOS Vehicle (CR): 0
Total Miles Operated 35,000	Number of Vehicle Inspected (CR): 0
Recordable Accidents 0	OOS Vehicle (MCMIS): 1
Recordable Accidents/Million Miles 0.00	Number of Vehicles Inspected (MCMIS): 2


Your proposed safety rating is : UNSATISFACTORY	Rating Factors			
		Acute	Critical	
	Factor 1:	C	1	0
	Factor 2:	U	2	1
	Factor 3:	U	0	2
	Factor 4:	U	0	3
	Factor 5:	N	0	0
Factor 6:	S	-	-	

Effective date: The unsatisfactory rating will take effect 45 days after the date of a forthcoming official notice from the Federal Motor Carrier Safety Administration headquarters office in Washington, D.C.

PROHIBITION: Under 49 USC sections 13905(f)(1)(B) and 31144, and 49 CFR section 385.13, a motor carrier that receives a final safety rating of unsatisfactory is prohibited from operating a commercial motor vehicle in interstate and intrastate commerce and, if applicable, shall have its registration revoked unless and until such time the FMCSA determines the motor carrier is fit and the motor carrier has reinstated its registration.

49 U.S.C. 31144 provides that the prohibition takes effect unless the motor carrier, within 45 days of the date of the forthcoming



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official notice, takes the necessary steps to improve the rating to conditional or satisfactory.

Unless the motor carrier receives an improved rating within 45 days from the date of the forthcoming official notice from Washington, D.C, the motor carrier will be subject to the prohibition in 49 CFR 385.13.

Corrective actions must be taken for the violations (deficiencies) listed on Part B of this review. Title 49 CFR Sections 385.15 and 385.17 provide for administrative review and a change to a safety rating based on corrective actions, respectively. A request for a change to a safety rating under section 385.17 may be made at any time. A motor carrier may request, in writing, a change in the rating by providing evidence of corrective actions to the Field Administrator for the FMCSA Service Center in which the carrier maintains its principal place of business. (See 49 CFR 385.17 for additional details). A request for administrative review under section 385.15 must be made within 90 days of the date of the proposed safety rating issued under section 385.11(c) or a final safety rating issued under section 385.11(b), or within 90 days after denial of a request for a change in rating under section 385.17


Administrative Review: A motor carrier of hazardous materials or passengers may appeal its proposed safety rating in a petition filed pursuant to 49 CFR section 385.15 if it believes that the rating is in error and there are factual and procedural issues in dispute. Such appeals must be made within 90 days of the date of the proposed safety rating, but should be made within 15 days of the date of the safety rating notice to allow the FMCSA to issue a written decision before the prohibitions in 49 CFR 385.13 take effect. Appeals filed pursuant to section 385.15 should be addressed to: Chief Safety Officer, Federal Motor Carrier Safety Administration, 1200 New Jersey Ave., S.E., Washington, DC 20590. The motor carrier will receive a written decision on the petition within 30 days from receipt of the petition by the Chief Safety Officer. (See 49 CFR 385.15 for additional details.)

(Note: Neither a petition to contest the rating nor a request for a change in the rating will delay the effective date of the rating, if unchanged.)

If this was a focused investigation, which will be noted in the Review Type on the first page of this report (Part A), some factors shown above may be marked "SATISFACTORY" even if they were not reviewed. A focused investigation will not result in a SATISFACTORY safety rating because all standards and factors specified in 40 CFR 383.5 and 385.7 were not examined in full, even though it may appear that they were under the rating factors in Part B of this document. It may, however, result in a less than SATISFACTORY rating if sufficient violations are discovered in the parts and factors examined to result in a CONDITIONAL or UNSATISFACTORY rating, or a non-ratable review.

If you receive a conditional or unsatisfactory rating, you may request an administrative review under 49 CFR 385.15 or a safety rating upgrade based on corrective action under 49 CFR 385.17. However, a successful request may only result in a non-ratable status, upgrade to a conditional safety rating, or reinstatement of your most recent safety rating. You will not receive a new satisfactory safety rating as a result of your request(s) under 49 CFR 385.15 and/or 49 CFR 385.17.



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Part B Requirements and/or Recommendations		

1. CONTROLLED SUBSTANCES AND ALCOHOL BASIC PROCESS BREAKDOWN: Policies and Procedures

DESCRIPTION OF PROCESS BREAKDOWN

The motor carrier allowed their drivers to operated commercial motor vehicles (CMVs) that required a CDL without first implementing a controlled substances and alcohol program. Chris Miller is one of the motor carrier owners. The safety management process (SMP) that is breaking down is policies and procedures. The motor carrier needs to implement policies and procedures that require the implementation of a controlled substances and alcohol testing program before allowing their drivers to operate CMVs that require CDLs.

BASIC SPECIFIC RECOMMENDED REMEDIES

Ensure to implement a controlled substances and alcohol testing program. CFR 382.115(a)

Implement Safety Improvement Practices: The following are recommended practices related to Policies and Procedures.

- Develop a written company policy incorporating by reference all regulations regarding controlled substances and alcohol use, testing, training, and records retention for all employees.
- Develop a policy requiring drivers to submit copies of all citations for moving violations to carrier management within 24 hours.
- Establish a process to ensure that drivers who are randomly tested can be immediately removed if they are found to be positive and that they do not return to safety-sensitive duties until they have complied with the "return-to-duty" process.
- Establish written policies and procedures that promote, verify, and enforce adherence to all controlled-substance and alcohol rules and regulations. Procedures should be tailored to company operations and should provide specific checks and guidelines for interacting with a consortium, if applicable.
- Establish a process to ensure that test results are properly safeguarded from unauthorized disclosure to prospective employers without specific written consent and from disclosure under any circumstances to insurance companies and other nonqualified parties, in accordance with regulations.
- Develop a policy to ensure that all alcohol testing is conducted immediately before or after the period that employees are performing a safety-sensitive function. Drivers can be tested on their day off only for controlled substances. Once notified of their selection, drivers must proceed immediately to the testing facility. If a driver refuses to go, this should be considered as equivalent to a positive result.
- Consider developing a driver selection protocol that uses valid random-number-generator software on a monthly basis to select, by driver identification number, 5 to 8 percent of drivers for controlled-substance testing and 2 to 5 percent for alcohol testing. This will ensure selection of 50 percent of drivers for controlled-substances testing and 10 percent for alcohol testing per year, given fluctuations in the driver workforce over the course of the year.
- Develop a written and progressive disciplinary policy focused on taking corrective action to ensure drivers comply with regulations and policies. A progressive disciplinary policy could include, among other things, written warnings, suspensions, or work restrictions, monetary penalties, and termination. This policy should also specify consequences for any carrier official who knowingly and willfully allows controlled-substance and alcohol violations.

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.

2. DRIVER FITNESS BASIC PROCESS BREAKDOWN: Policies and Procedures

DESCRIPTION OF PROCESS BREAKDOWN

The motor carrier allowed their drivers to operated commercial motor vehicles (CMVs) that required a CDL without first requiring their drivers to obtain a CDL. The motor carrier does not maintain driver qualification files on all of their drivers. Chris Miller is one of the motor carrier owners. The safety management process (SMP) that is breaking down is policies and procedures. The motor carrier needs to implement policies and procedures that require their



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drivers to obtain a CDL prior to allowing their drivers to operate CMVs that require CDLs. The motor carrier also needs to implement policies and procedures that require them to maintain driver qualification files on all their drivers.

BASIC SPECIFIC RECOMMENDED REMEDIES

The definition of a CDL required COMMERCIAL MOTOR VEHICLE can be found in CFR 383.5

Ensure that all drivers obtain the proper class CDL and endorsements before allowing them to operate a CMV that requires a CDL.

The definitions of DRIVER, for PART 391, can be found in CFR 390.5

Ensure to maintain a driver qualification file on each driver employed. The driver qualification file is required to be maintained for the lifetime of the driver's employment and for three years after the driver's employment has ceased. CFR 391.51(a)

Helpful information can also be found in the Education & Technical Assistance Program booklet on pages 51-77.

Helpful information can also be found in the Education & Technical Assistance Program booklet on pages 66-74.

Implement Safety Improvement Practices: The following are recommended practices related to Policies and Procedures.

- Develop a policy for the periodic review (at least twice per year) of driver qualification files. The motor carrier should not rely on third-party sources, such as insurance agencies. The procedure should include controls to ensure that documents requiring renewals are in place, to remind drivers of expiration dates on medical certificates, so they can schedule another physical examination in advance, and to prevent falsification of documents related to driver qualification.
- Establish a policy requiring drivers to submit copies of all vehicle and roadside inspections and moving violations to carrier management within 24 hours, and to notify management of suspended or revoked Commercial Driver's Licenses (CDLs) immediately following notification of suspension/revocation.
- Establish a policy requiring all new (since 2003) Commercial Driver's License (CDL) drivers to submit documentation of entry-level driver training in - for example, driver qualification requirements, Hours of Service (HOS), driver wellness, and whistleblower protection - or to take entry-level training provided by the carrier.
- Develop a policy for document retention and recordkeeping, including documents that are to be in the possession of the driver as proof of credentials.
- Develop a process to ensure that operations will always have the proper amount of fit drivers. This process would address how to deal with issues such as sick leave, vacation, training, suspension, and termination.
- Develop a written and progressive disciplinary policy focused on taking corrective action to ensure drivers comply with regulations and policies. A progressive disciplinary policy could include, among other things, written warnings, suspensions, or work restrictions, monetary penalties, and termination. This policy should also specify consequences for any carrier official who knowingly and willfully allows Driver Fitness Violations.

3. HOS COMPLIANCE BASIC PROCESS BREAKDOWN: Policies and Procedures

DESCRIPTION OF PROCESS BREAKDOWN


The motor carrier allowed their drivers to operated commercial motor vehicles (CMVs) without completing a record of duty status (RODS). Chris Miller is one of the motor carrier owners. The safety management process (SMP) that is breaking down is policies and procedures. The motor carrier needs to implement policies and procedures that require their drivers to complete a RODS when they are operating a CMV.

BASIC SPECIFIC RECOMMENDED REMEDIES

Ensure to require all drivers to prepare a record of duty status (RODS) using the appropriate method. CFR 395.8(a)(1)

The definition of DRIVER, for PART 395, can be found in CFR 390.5



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The requirements for a driver's record of duty status (RODS) can be found in CFR 395.8(a)(1)

The short haul exemption for driver's of a commercial driver's license (CDL) required commercial motor vehicle (CMV) can be found in CFR 395.1(e)(1)

The short haul exemption for driver's of a non-CDL required CMV can be found in CFR 395.1(e)(2)

Helpful information can also be found in the Education & Technical Assistance Program booklet on pages 90-96.

Implement Safety Improvement Practices: The following are recommended practices related to Policies and Procedures.

- Develop a policy and procedure describing how management will monitor and track logs for falsification.
- Establish a policy that prohibits dispatchers from assigning a load to drivers without hours available to complete the load on time.
- Develop a policy stating that drivers should not violate their Hours-of-Service (HOS) Out-of-Service (OOS) order under any circumstances, and immediately contact the carrier when a driver is placed OOS.
- Develop a policy requiring drivers to report their available hours to dispatch during "check-in" calls.
- Develop policies and procedures for ensuring proper retention of Record of Duty Status (RODS) according to regulations.
- Establish a policy requiring drivers to submit copies of all roadside inspections to carrier management within 24 hours.
- Develop a policy stating that drivers are required to submit all Records of Duty Status (RODS) and supporting documentation, such as expense receipts, within 13 days of the end of the trip.
- Establish a policy stating that drivers are required to check with their supervisor, manager, or dispatcher to review their "fit-for-duty" status before starting a job, and that drivers who are ill to the extent that their ability and/or alertness is impaired are prohibited from working on safety-sensitive assignments.
- Develop a written and progressive disciplinary policy focused on taking corrective action to ensure drivers comply with regulations and policies. A progressive disciplinary policy could include, among other things, written warnings, suspensions, or work restrictions, monetary penalties, and termination. This policy should also specify consequences for any carrier official who knowingly and willfully allows Hours-of-Service (HOS) violations.

4. VEHICLE MAINTENANCE BASIC - INSPECTION-REPAIR-MAINTENANCE PROCESS BREAKDOWN: Policies and Procedures

DESCRIPTION OF PROCESS BREAKDOWN

The motor carrier allowed their drivers to operated commercial motor vehicles (CMVs) without requiring their CMVs to be periodically inspected in the previous twelve months. The motor carrier does not require their drivers to complete a driver vehicle inspection report (DVIR) at the end of each days use of the CMV. The motor carrier does not maintain vehicle maintenance files on their CMVs. Chris Miller is one of the motor carrier owners. The safety management process (SMP) that is breaking down is policies and procedures. The motor carrier needs to implement policies and procedures that require their CMVs to be periodically inspected every twelve months. The motor carrier needs to implement policies and procedures that require their drivers to prepare a DVIR at the end of each days use of each CMV. The motor carrier needs to implement policies and procedures that require them to maintain a vehicle maintenance file on each CMV.


BASIC SPECIFIC RECOMMENDED REMEDIES

The definitions of COMMERCIAL MOTOR VEHICLE and INTERSTATE COMMERCE, for PARTS 393 & 396, can be found in CFR 390.5

Ensure to keep minimum records of inspection and vehicle maintenance. CFR 396.3(b)

Ensure to require each driver to complete a driver vehicle inspection report (DVIR) at the end of each days use of each CMV. CFR 396.11(a)



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Ensure to require ALL commercial motor vehicle(s) (CMV's) that will be used in interstate commerce have a current periodically inspection before being used in interstate commerce. CFR 396.17(a)

Helpful information can also be found in the Education & Technical Assistance Program booklet on page 101.

Implement Safety Improvement Practices: The following are recommended practices related to Policies and Procedures.

- Develop a system of preventive maintenance for compliant, safe, and efficient fleet operations, including a schedule for periodic maintenance, inspection, and recordkeeping. This system should be attuned to manufacturer recommendations, the carrier's own experience, and regulatory requirements.
- Develop a procedure ensuring that vehicle defects that impact safety and/or safety compliance are reported, repaired, and certified before the vehicle is operated.
- Develop procedures to ensure that management is notified of vehicle defects through the use of Driver Vehicle Inspection Records (DVIRs) and other communication channels, such as driver call-in and e-mail from mechanics.
- Develop a policy ensuring that drivers are qualified to complete thorough and timely Driver Vehicle Inspection Records (DVIRs) by the end of the day of the trip and prior to a subsequent assignment.
- Establish a policy requiring drivers to submit copies of all roadside inspections to carrier management within 24 hours.
- Develop policies and procedures requiring drivers to immediately notify appropriate management of any roadside vehicle Out-of-Service (OOS) order.
- Develop a written and progressive disciplinary policy focused on taking corrective action to ensure drivers comply with regulations and policies. A progressive disciplinary policy could include, among other things, written warnings, suspensions, or work restrictions, monetary penalties, and termination. This policy should also specify consequences for any carrier official who knowingly and willfully allows vehicle maintenance violations.

5. Ensure that you have the minimum levels of financial responsibility coverage in place for the type of vehicles and cargo you are transporting. CFR 387.31(a)

A chart of minimum levels of financial responsibility can be located in CFR 387.33T

6. Ensure that you maintain a copy of the MCS-90 form, provided by your insurance company, at your principal place of business. CFR 387.7(d)

The definition for principal place of business can be found in CFR 390.5

7. Ensure to file the correct MCS-150 form prior to operating commercial motor vehicles in interstate commerce. CFR 390.19(b)(1)

Ensure that when completing an MCS-150 that all information provided is true and accurate.

8. Ensure to obtain the required operating authority prior to operating as a for-hire carrier in interstate commerce. CFR 392.9a(a)(1)


9. Ensure to obtain a USDOT number prior to operating CMVs in interstate commerce. CFR 392.9b(a)

10. One option to check the accuracy of your driver's logbooks for commercial vehicles driven in the state of Washington is to obtain license plate reader information (time and date of vehicles driving into or by Washington State scales) from the Washington Department of Transportation.

These records can be requested by going to <http://www.wsdot.wa.gov/Contact/PublicDisclosure> and submitting a Public Disclosure Form (found on the website), and send it to the below listed office by e-mail, fax, or mail.

Submit your request to:



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WSDOT
 Records & Information Services
 PO Box 47410
 Olympia, WA 98504-7410

Phone: (360) 705-7734
 Fax: (360) 705-6808
 E-mail: publicdisclosurerequests@wsdot.wa.gov

Please ensure you submit a detailed description of the records you are requesting (time, date and vehicle ID of crossings). The following information should be provided as a minimum:

USDOT number
 Vehicle plate numbers
 Name of Carrier
 Time frame requested (eg. May-July 20xx)

11. The DataQ system is an electronic means for filing concerns about Federal and State data released to the public by the federal Motor Carrier Safety Administration (FMCSA). Through this system, data concerns are automatically forwarded to the appropriate office for resolution. The system also allows filers to monitor the status of each filing.


The DataQ system is to be used to challenge data issued by the FMCSA. Information disseminated by the FMCSA includes data reported to FMCSA through the requirements of Federal and State programs. Release of this data is done in the interest of information exchange and to satisfy the requirements of the Freedom of Information Act. The United States government assumes no liability for the use of the data.

With respect to crash and roadside inspection data, the MCMIS documents the occurrence and results of these events as reported by the States. Any challenge to data provided by the State agencies must be resolved by the appropriate State agency. Once a State office makes a determination on the validity of the challenge, FMCSA considers the decision as the final resolution of the challenge. FMCSA cannot change State records without State consent.

<https://dataqs.fmcsa.gov>

12. • **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.



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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. Receipt of this report acknowledges your understanding that the violations discovered by the FMCSA during this review may be used to calculate any civil penalty proposed as a result of this review.

Attached to this report is Table 1, which identifies all the documented violations which were discovered during the course of this review.

- 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:

Jeffrey James, Division Administrator
 Federal Motor Carrier Safety Administration
 Washington Division
 2424 Heritage Court, SW, Suite #302
 Olympia, WA 98502-6031

- 385.15 - If you believe the proposed rating is in error and there are factual and procedural issues in dispute, Part 385.15 (copy provided) outlines procedures for petitioning the Federal Motor Carrier Safety Administration for an administrative review of these findings. Your petition should be addressed to:


Chief Safety Officer
 Federal Motor Carrier Safety Administration
 1200 New Jersey Avenue SE,
 Washington, DC 20590

- 385.17 - In addition, a request for a revised rating based on corrective actions may be made at any time. Part 385.17 (copy provided) 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:

Terry Wolf, Regional Field Administrator
 Federal Motor Carrier Safety Administration
 Western Service Center
 Golden Hills Office Centre
 12600 W. Colfax Ave. Suite B-300
 Lakewood, CO 80215

Ensure that a CC copy of the letter is mailed to:
 Jeffrey James, Division Administrator
 Federal Motor Carrier Safety Administration



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Washington Division
 2424 Heritage Court, SW, Suite #302
 Olympia, WA 98502-6031


This letter should be submitted as soon as possible.

- If you believe the violations recorded in Part B of this investigation were an error, you may submit a Request for Data Review (RDR) through DataQs. The DataQs system is the most effective way to remove violations on the investigation report that did not affect your safety rating data. DataQs is an online system that allows a motor carrier or driver to request and track a review of Federal and State issued data that it believes to be incomplete or incorrect. To submit an RDR, go to <https://dataqs.fmcsa.dot.gov>.

- Passenger 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 FMCSA 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 interstate 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/>.



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	Part C	

Reason for Review: Compliance Review
Planned Action: Prosecution WA-2018-0042-US1616

Parts Reviewed Certification:

325 342 343 347 390 391 392 393 395 396 397 398 399 171 172 173 177 178 180
 ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓

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?

Yes - Interstate and Intrastate

Does carrier transport placardable quantities of hazardous materials?

Unsat/Unfit rule:

45-Day - Interstate Passenger

Corporate Contact: Chris Miller
Corporate Contact Title: Owner

Special Study Information:

Remarks:

Investigative Report Received by:

Name to whom it was sent: Chris Miller, Owner
 Mailing method: UPS
 Date Sent: February 28, 2018
 Tracking/Confirmation Number: 1ZA4766W0397662204

Reason for Investigation:

The motor carrier was referred to the FMCSA Washington Division after a roadside stop discovered multiple out-of-service (OOS) violations. The OOS violations included operating a passenger-carrying vehicle without possessing a valid medical certificate, operating a commercial motor vehicle (CMV) without a commercial driver's license (CDL), and the rear emergency window exit blocked by wall and television. The motor carrier was also discovered to be operating without a USDOT number.

Scope of the Investigation:


The investigation was assigned as a comprehensive investigation.

Carrier Operation Description:

The Washington State Secretary of State lists the motor carrier's governing persons as Chris Miller and Mike Thomas. The motor carrier's principal place of business is located at 117 NW 189th St. Ridgefield, WA 98642. The motor carrier is an authorized for-hire carrier of passengers. The motor carrier is a limousine company that the evidence shows operates in Washington and Oregon. The motor carrier was non-cooperative throughout the entire investigation and was attempting to represent themselves as a company that had one vehicle that was not subject to the regulations and one driver. The evidence obtained through the investigation process shows the motor carrier has operated no less than four commercial motor vehicles and has employed no less than five drivers in the previous twelve months.

The motor carrier's 2017 fiscal year ended on December 31, 2017. The motor carrier's gross revenue for their 2017 fiscal year is unknown. The evidence obtained through the investigation process shows that the gross revenue provided by the motor carrier was inaccurate. The motor carrier's vehicle miles traveled (VMT) is also unknown. The evidence obtained through the investigation process shows that the VMT provided by the motor carrier for the previous twelve months was inaccurate.



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The motor carrier has not been subject to a safety audit. This is the motor carrier first compliance investigation.

Pre-Investigation:

The motor carrier was contacted on December 06, 2017. The FMCSA Safety Investigator attempted to contact Mike Thomas at (360) 936-5048. A person who identified himself as Kenneth Cordell answered the phone and stated that he worked for Silver Limousine, but would not provide and further information about the company. The FMCSA Safety Investigator called (503) 310-7776 and Chris Miller answered the phone. A compliance investigation was scheduled for January 22, 2018 since Mr. Miller stated that he would be out of the state for the holidays. An email containing an appointment letter, carrier information packet (CIP), and the investigator's contact information was sent to pdxlimo@gmail.com at the request of Mr. Miller.

The attached appointment letter confirmed the appointment for Monday January 22, 2018 to begin between 1100-1130 at 117 NW 189th Street Ridgefield, WA 98642. The appointment letter also requested the following documents be available in case they are required to be investigated:

- List of drivers used in the 12 months prior to the review including date of hire, date of termination, CDL state and license # and date of birth.
- Driver qualification files.
- Controlled substance testing records.
- Driver payroll records.
- Driver records of duty status for the past 6 months.
- Drivers trip reports and expense records for the past 6 months, including scale and fuel receipts (Comdata, EFS), toll receipts, IFTA reports, trip envelopes, dispatch records, payroll records, bills of ladings and any other supporting documents.
- Motor vehicle accident files for the past 12 months.
- List of equipment (company #, license #, state, year, make, GVWR) used in past 365 days.
- Lease agreements and associated maintenance records if applicable.
- Vehicle Maintenance records.
- Driver vehicle inspection reports for the last 90 days (DVIRs).
- All roadside inspections for the past 365 days.
- Company gross revenue for the last full year.
- Total fleet mileage for the last year.
- A copy of your MCS-90, endorsement for motor carrier policies of insurance for the current policy.
- Insurance claim information for past 365 days (loss run).
- Hazmat documents if applicable (PHMSA Registration, Safety Permit, etc.)

The CIP was requested to be completed and returned no later than Friday December 22, 2017. The motor carrier returned a blank CIP.

CDLIS (DRIVER LICENSE) CHECK:

All drivers were checked using CDLIS and the Washington State Department of Licensing database.

Authority:

The evidence obtained through this compliance investigation shows that the motor carrier is an authorized for-hire carrier of passengers and is required to have operating authority. The motor carrier does not currently have any operating authority.

Insurance:

The evidence obtained through this compliance investigation shows that the motor carrier is an authorized for-hire carrier of passengers and operates at least two CMVs with a seating capacity of sixteen passengers or more. The motor carrier CMVs require them to have a minimum of \$5,000,000.00 in liability insurance. The motor carrier currently has \$1,050,000 in liability insurance for one CMV. The motor carrier has not supplied any other evidence of liability insurance that would cover any of the other CMVs that the evidence shows has been operated by Silver Limousine in the previous twelve months.


Drivers with Red Flag Violations:

The motor carrier does not employ any drivers who have received a red flag violation in the previous twelve months.

Controlled Substances and Alcohol Supplemental Review:

A controlled substances and alcohol supplemental review was not required to be performed.



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Hazardous Materials Supplemental Review:
A hazardous materials supplemental review was not required to be performed.

Investigation:
The opening interview was conducted as schedule on Monday January 22, 2018. Present at the opening interview were Chris Miller (Owner), Wendy Stevens (General Manager), Francine Gagne (WJTC Special Investigator), and David Armstrong (FMCSA Safety Investigator).

The motor carrier had minimal information available at the opening interview. The motor carrier stated that the limousine company had only been operating from July 2017 to October 2017. The motor carrier stated that they only use a 2007 Chrysler 300 that seated eight people. The motor carrier also stated that they have only used two drivers in the previous twelve months. They stated that Chris Miller was the primary driver and that Kenneth Cordell filled in for Mr. Miller when he was sick. The motor carrier stated that their gross revenue for 2017 was \$9,854.00 and that the motor carrier is no longer operating their limousine. The motor carrier stated that they did not have a business account for Silver Limousine.

The investigation took multiple weeks as information was gathered to accurately identify the motor carrier's operating. The evidence gathered through the investigation of the motor carrier shows that motor carrier was inaccurate in their original description of their operation to FMCSA.


The motor carrier's Facebook paged and pdxlimo.net website were valuable resources in the investigation into the motor carrier. Silver Limousine's website is located at pdxlimo.net. Their website states "Diverse Fleet Towncars, Hummers, excursions, we even have a party bus." The motor carrier's Facebook page is located at <https://www.facebook.com/SilverLimousine/>. The Facebook page contained pictures of the motor carrier's twenty-two passengers white 2000 Ford Excursion stretch limousine at the North Marion school buildings. The motor carrier's business card states "Hottest Limousines in Town All Newer Limousines, SUVs, and Party Bus".

Interviews were conducted with North Marion Intermediate School Principal Cory Gaub on Tuesday January 23, 2018 and Tuesday February 13, 2018 at North Marion Intermediate School. Principal Gaub explained that their school had entered a fundraising agreement with Big Kahuna Fundraising through Fundraising Consultant Catherine Nitz. He explained that one of the fundraising awards was a limousine ride to and from a Pizza Hut for lunch. He explained that the limousine service was acquired by Big Kahuna Fundraising and the limousine rides occurred on November 14, 2017. He explained that one limousine was provided and that three separate trips to and from the Pizza Hut were made. He explained that the first trip contained twenty-one passengers, the second trip contained eighteen passengers, and the third trip contained nineteen passengers. He provided a written statement and school documentation to support the information provided. Principal Gaub also provided the contact information for Catherine Nitz.

An interview was conducted with Big Kahuna Fundraising Consultant Catherine Nitz on Tuesday January 23, 2018 at her home in Oregon. She stated that she has been doing business with Silver Limousine and using Silver Limousine's services for the past nine years and that she has dealt with Chris Miller since Silver Limousine was originally called Executive Touch Limousine. She stated that in the last three to four years she has been dealing with Chris Miller and Wendy Stevens. She stated that within the last few months she was starting to deal with Alec Tiffany-Higley. She stated that she would contact Silver Limousine through email at pdxlimo@gmail.com and phone at (360) 606-3861. She stated that Silver Limousine originally hired Alec as a driver, but that he seems to have taken on more administrative duties recently. She stated that she has records of different fundraising events that she has used Silver Limousine services for the last several school years. She stated that she knew Silver Limousine had two hummers and that one was white and one was black. That they had a 22-passenger excursion that she used most often and that they had party bus, but that she never used the party bus. She stated that she had billing invoices from Silver Limousine. She provided her last two years of events, her last several months of billing from Silver Limousine, and pictures in subsequent emails.

The evidence provided by Catherine Nitz shows that Silver Limousine has been operating for the last twelve months and that for the last twelve months she has booked limousine services from Silver Limousine that have included three separate drivers (Alec Tiffany Higley, Patrick Mittlestedter, and Brent Torson) and three separate limousines (White Hummer, 22 passenger Excursion (EXEC 20), and black hummer. This information was gathered from Silver Limousine's billing information that was sent to Catherine Nitz after the limousine services were provided. The billing information submitted from Silver Limousine to Catherine Nitz and Big Kahuna Fundraising provided the drivers name and the limousine that was used. Catherine Nitz confirmed that the billing statements from Silver Limousine that showed blk hummer or B HUM under the "vehicle type" or "item" were from events that Silver Limousine provided the black hummer, that the billing statements from Silver Limousine that showed WHUM for the "vehicle type" were from events that Silver Limousine provided the white



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hummer, and that the billing statements from Silver Limousine that showed EXEC 20, wht ex 22, or 22 Passenger White Ex under the "vehicle type" or "item" were from events that Silver Limousine provided the 22 passenger white Excursion. She stated that she most frequently used the 22-passenger white Excursion for most of her events, but that she was told by Silver Limousine that because the USDOT was conducting an audit and asking about the white Excursion that Silver Limousine would be replacing the white Excursion with the white Hummer for all upcoming events.

A second interview was conducted with Silver Limousine on Wednesday January 24, 2018. Present at the opening interview were Chris Miller (Owner), Wendy Stevens (General Manager), Francine Gagne (WUTC Special Investigator), and David Armstrong (FMCSA Safety Investigator). The motor carrier had less information available than at the opening interview as Chris Miller stated his father had taken some of the documents and they did not know where the documents went. Chris Miller was the name of his father and Chris Miller identified his father as Salvador Pardo. Chris Miller stated that his father owns the property that the PPOB is located on. Chris Miller was asked to see inside his shop that was located on his PPOB. Located inside the shop was a black Hummer H2 with Oregon State License plate ICON04. Mr. Miller stated that the hummer was not licensed and not used by Silver Limousine's business. The evidence obtained through the investigation shows that the Hummer H2 is currently licensed and that the Hummer H2 was actively being used for the previous twelve months and while the compliance investigation was ongoing.

Mr. Miller and Wendy Stevens were also shown a CVSA Level II inspection (WAC060001392) that was conducted on their 2008 Chevy Eldorado mini bus on September 27, 2017. They were also shown pictures of the 2008 Chevy Eldorado and a Silver Limousine Services invoice. Mr. Miller and Wendy Stevens stated that the mini bus was purchased from Rick Lycksell three or four years ago and that they did not use it for their business and intended to convert it into a food truck. They stated that on September 27, 2017 they were in Las Vegas and that driver Kenneth Cordell was instructed to take the vehicle to Gary Livingston who lives in La Center, WA to have it converted into a food truck, but that Kenneth Cordell must have decided to use the mini bus to book the bachelor party without their knowledge. They were asked where the mini bus is currently and stated the vehicle was still at Gary Livingston's house, but refused to give Gary Livingston's address. The motor carrier never provided the address and did not provide access to this CMV.


Mr. Miller and Wendy Stevens were asked about a 2000 Ford Excursion, with the white body and black top, that is registered and owned by Silver Limousine out of 117 NW 189th St. Ridgefield, WA. They both stated that they did not have any knowledge of the vehicle and did not know why it was registered in the company's name. Chris Miller admitted, at the closing interview, that Silver Limousine use to own the 2000 Ford Excursion, but that Silver Limousine had sold it to Richard Lycksell in March of 2017. The evidence obtained through this investigation shows that Silver Limousine has been using the 2000 Ford Excursion, with the white body and black top, for the previous twelve months and was actively being used during the compliance investigation. The evidence shows that this is one of the motor carrier's most used limousines.

The owner of the property, that the PPOB is located on, is SP LLC. Washington and Oregon business records where checked and SP LLC is a company registered out of the State of Oregon and owned by Salvador Pardo. A search was then conducted to see if SP LLC owned anymore properties in Clark County. The evidence shows that SP LLC also owns 2502 NE 117th St. Vancouver, WA 98686 and 113 NW 194th St. Ridgefield, WA. The two addresses were extremely valuable. The Ridgefield address was visited on Friday February 16, 2018 the property contained a white 2006 Hummer H2, CK25075 OR, that is registered to Elite Limousine LLC and legally owned by Richard Lycksell, a black 2003 Hummer H2, 772JAB OR, registered to Chris Miller and legally owned by a bank, a red 2008 Chevrolet Eldorado, B014137 OR, registered to VIP Luxury Limousine and legally owned by X-treme Rentals, and a black 1996 Chevrolet Eldorado, B013630 OR, that is register to VIP Luxury Limousine and legally owned by X-treme Rentals. X-treme Rentals is business registerec in the State of Oregon. X-treme Rentals registered agent is Dale Roller and managed by Richard Lycksell. VIP Luxury Limousine's is a business registered in the State of Oregon and in the State of Washington. VIP Luxury Limousine's President is Matt Nevarez and the Secretary is Darren Eby. This Limousine company seems to operate in Eastern Washington and Idaho.

After the visit to the property Silver Limousine driver Alec Tiffany-Higley started following FMCSA Safety Investigator David Armstrong while he was driving. The FMCSA Safety Investigator noticed the driver of a Toyota Camry driving erratically and either filming and/or taking pictures of him. The FMCSA Safety Investigator pulled over as did the driver of the Toyota Camry, who was Alec Tiffany-Higley. Alec Tiffany-Higley was interviewed on the roadside and accused FMCSA Safety Investigator David Armstrong of stalking his children. The FMCSA Safety Investigator provided Mr. Tiffany-Higley with two business cards and showed him his official credentials. Mr. Tiffany-Higley denied working for Silver Limousine. When he was confronted with evidence that proved he worked for Silver Limousine he stated "I did not know it was illegal to work for them".

An in-person interview was conducted with South Prairie Elementary School Principal Karen Thenell on Wednesday



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February 14, 2018 in Principal Karen Thenell's office. She was extremely cooperative and provided valuable information to the investigation. She was very concerned about the school children's safety and why the FMCSA was conducting their investigation into Silver Limousine. They confirmed that the school had entered a fundraising agreement with Big Kahuna Fundraising and that one of the prizes was a ride in a limousine. They provided a statement and redacted records that show the limousine ride occurred on November 16, 2018. She also provided pictures that show that the 2000 Ford Excursion, with the white body and the black top, was the limousine that was provided to transport the passenger to and from lunch.

An in-person interview was conducted with Quatama Elementary School Principal Christy Walters and Hillsboro School District Risk Manager Leah McCarthy on Thursday February 15, 2018 in Principal Christy Walters office. Both parties were extremely cooperative and provided valuable information to the investigation. They were both very concerned about the school children's safety and why the FMCSA was conducting their investigation into Silver Limousine. They confirmed that the school had entered a fundraising agreement with Big Kahuna Fundraising and that one of the prizes was a ride in a limousine. They provided a statement and redacted records that show the limousine ride occurred on November 02, 2018. They also provided pictures that show that the 2000 Ford Excursion, with the white body and the black top, was the limousine that was provided to transport the passenger to and from lunch. In addition to this information, they also confirmed that they had emails that stated "Alec" would be the limousine driver.

The closing interview was conducted on Monday February 26, 2018 at the motor carrier's PPOB. Present at the closing interview were Chris Miller (Owner), Wendy Stevens (General Manager), Francine Gagne (WUTC Special Investigator), Jeff James (FMCSA), and David Armstrong (FMCSA Safety Investigator). The closing interview included a person who would not initially identify his whole name. He introduced himself as Chris and filmed the closing interview on a cell phone from the couch located inside the PPOB. Chris later gave his last name as Johnson. Based off evidence offered and obtained the compliance investigation report was changed and the final compliance investigation report was mailed via UPS on Wednesday February 28, 2018 to the motor carrier's PPOB.

The below investigation is based off the strongest evidence discovered through the investigation process. The evidence obtained through this investigation shows that in the previous twelve months the motor carrier has operated four commercial motor vehicles which include a black 2006 Hummer H2 limousine with seating for 15 including the driver, a 2008 white Chevrolet Eldorado with seating for more than 16 including the driver, a 2000 Ford Excursion, with a white body black top, with seating for more than 16 including the driver, and a 2007 Black Chrysler 300 with a seating for 9 including the driver. The evidence shows that the motor carrier has employed five drivers in the previous twelve months including Chris Miller, Kenneth Cordell, Alec Tiffany-Higley, Brent Torson, and Patrick Mittlestedter.

Hazardous Materials (PART 107 THROUGH 180):

The evidence obtained through this compliance investigation shows that the motor carrier does not transport any hazardous materials. Thus, these Parts were not investigated.

Lease and Interchange of Vehicles (PART 376):

The evidence obtained through this compliance investigation shows that the motor carrier has operated at least four CMVs in the previous twelve months. One of the CMVs is registered to Silver Limousine, while one of the CMVs is registered to Silver Transportation LLC. The other two CMVs are owned by Chris Miller. Silver Transportation DBA Silver Limousine operated the two CMVs that are owned by Chris Miller without obtaining a written lease agreement as required by this Part.


Controlled Substances and Alcohol (Part 382):

The evidence obtained through this compliance investigation shows that the motor carrier has operated two CMVs, that require the driver to possess a CDL, in the previous twelve months. The motor carrier was asked to provide information that shows that they had implemented any kind of controlled substances and alcohol testing program during the 2017 calendar year. The only information that was provided by the motor carrier was a letter from CleanFleet, dated February 22, 2018, that states Silver Transportation DBA Silver limousine enrolled in their random controlled substances and alcohol testing program on January 22, 2018.

Commercial Driver's License (Part 383):

The evidence obtained through this compliance investigation shows that the motor carrier has operated two CMVs, that require the driver to possess a CDL, in the previous twelve months. The two drivers are Kenneth Cordell and Alec Tiffany-Higley. Both driver operated a CMV that required a Class C CDL with a passenger endorsement when they only had a personal driver's license (PDL). The evidence shows that Alec Tiffany-Higley has operated a CMV requiring a CDL numerous times while only possessing a PDL.



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Financial Responsibility (Part 387):

The evidence obtained through this compliance investigation shows that the motor carrier is an authorized for hire carrier of passengers and operates at least two CMVs with a seating capacity of sixteen passengers or more, including the driver. The motor carrier is required to have a minimum of \$5,000,000.00 in liability insurance. The motor carrier provided an insurance policy that had \$1,050,000.00 in liability coverage for the 9 passenger 2007 Chrysler 300. This policy was obtained by the motor carrier on January 23, 2018. The motor carrier did not provide any evidence that shows the 2007 Chrysler 300 had any liability insurance coverage prior to this policy. The motor carrier did provide a copy of a revised policy that shows that the liability insurance had been changed from \$1,050,000.00 to \$1,500,000.00 for the 2007 Chrysler 300.

Evidence was obtained to shows that the motor carrier's 2008 Chevrolet Eldorado was insured as a motor home, but the insurance coverage only covered the vehicle if it was damaged on the property in which Chris Miller stated it was being parked and not used. There was no evidence provided or obtained that showed this vehicle or any of the other two vehicle had an appropriate insurance policy or any liability insurance in the previous twelve months. This includes the 2000 Ford Excursion and 2006 Hummer H2 that were provided when Big Kahuna Fundraising obtained limousines from Silver Limousine to fulfill the limousine prizes for numerous elementary schools in Washington and Oregon.

General Applicability (Part 390):

The evidence obtained through this compliance investigation shows that the motor carrier operated commercial motor vehicles without first filing the appropriate MCS-150.

The motor carrier is required to update their MCS-150 every February of every odd year. The motor carrier filed their first MCS-150 in January of 2018.

The motor carrier has not been involved in any emergency exemptions and did not operate under any waivers in the twelve months this investigation covered.

Qualification of Drivers (Part 391):

The evidence obtained through this compliance investigation shows that the motor carrier has employed five drivers in the previous twelve months.

The motor carrier had the driver qualification (DQ) file for Chris Miller at the opening interview. The motor carrier did not have a DQ file for Kenneth Cordell and seemed surprised to learn that they needed to have a DQ file for Kenneth Cordell if he was just filling in once or twice when Chris Miller was sick. Chris Miller denied having any other drivers and did not have and/or provide a DQ file for Alec Tiffany-Higley, Brent Torson, and Patrick Mittlestedter. The motor carrier was given a chance to provide the missing DQ files at the closing interview, but none were provided. At the closing interview, Chris Miller once again didn't understand why a DQ file would be needed for a driver that filled in when he was sick or for drivers that they borrowed from another company. Mr. Miller was informed that there may be exemptions for multi-employer driver's, but that a DQ file would be needed for any driver that operating a CMV for Silver Limousine.

Driving of Commercial Motor Vehicles (Part 392):

The evidence obtained through this compliance investigation shows that the motor carrier is an authorized for-hire carrier of passengers and is required to have operating authority and a USDOT number. The motor carrier did not have any operating authority at the time of the opening and closing of this investigation.


The evidence obtained through this investigation shows that the motor carrier operated CMVs in interstate commerce without a USDOT registration.

Hours of Service (Part 395):

The evidence obtained through this compliance investigation shows that the motor carrier did not require driver Alec Tiffany-Higley to prepare a record of duty status (RODS) as required on November 16, 17, 29, and 30, 2017 and December 4, 5, 6, 8, 12, 13, and 15, 2017. The motor carrier did not require driver Chris Miller to complete a RODS as required on September 23, 2017 and October 06, 2017. The motor carrier did not require driver Kenneth Cordell to complete a RODS on September 27, 2017 as required. The motor carrier did not require driver Brent Torson to complete a RODS on November 14, 2017 and December 07, 2017 as required. The motor carrier did not require driver Patrick Mittlestedter to complete a RODS for November 8, 15, and 30, 2017 and December 4, 2017 as required.

The motor carrier did not provide timecards or any other records that would have provided these drivers an exemption from completing a RODS on the dates indicated above.



	SILVER LIMOUSINE (SILVER TRANSPORTATION dba)	Review Date:
	U.S. DOT #: 3085952	02/28/2018
Part C		

Vehicle Maintenance (Part 393 & 396):

The evidence obtained through this compliance investigation shows that in the previous twelve months the motor carrier has operated four commercial motor vehicles which include a 2006 black Hummer H2 limousine , a 2008 white Chevrolet Eldorado, a 2000 Ford Excursion, with a white body and black top , and a 2007 Black Chrysler 300.

At the opening interview Silver Limousine had a vehicle maintenance file for the 2007 black Chrysler 300. Chris Miller and Wendy Stevens stated that Silver Limousine did not have any other Limousines or vehicles. Silver Limousine did not provide a vehicle maintenance file for the 2006 Hummer H2, the 2008 Chevrolet Eldorado, and the 2000 Ford Excursion during the opening interview. Silver Limousine did not provide any annual vehicle inspection reports or driver vehicle inspection reports (DVIRs) for the 2006 Hummer H2, the 2008 Chevrolet Eldorado, the 2000 Ford Excursion, and the 2007 Chrysler 300.

In a second interview, that occurred at Silver Limousine's PPOB, Chris Miller admitted to having a black 2006 Hummer H2 limousine and a white 2008 Chevrolet Eldorado, but stated that Silver Limousine does not use those vehicles. Chris Miller and Wendy Stevens were asked about the 2000 Ford Excursion, with the white body and black top, that is registered to and legally owned by Silver Limousine. Both Chris Miller and Wendy Stevens stated that they did not know anything about the 2000 Ford Excursion and had no idea as to how it got registered in Silver Limousine's name. During the second interview Silver Limousine did not provide a vehicle maintenance file for the 2006 Hummer H2 limousine, the 2008 Chevrolet Eldorado, and the 2000 Ford Excursion. Silver limousine did not provide any annual vehicle inspection reports or DVIRs for the 2006 Hummer H2 limousine, the 2008 Chevrolet Eldorado, the 2000 Ford Excursion, and the 2007 Chrysler 300.

At the closing interview Chris Miller stated that Silver Limousine use to own the 2000 Ford Excursion, but that he sold it to Richard Lycksell in March of 2017 and did not know where it was. Silver Limousine did not provide a vehicle maintenance file for the 2006 Hummer H2 limousine, the 2008 Chevrolet Eldorado, and the 2000 Ford Excursion. Silver Limousine did not provide any annual vehicle inspection reports or DVIRs for the 2006 Hummer H2 limousine, the 2008 Chevrolet Eldorado, the 2000 Ford Excursion, and the 2007 Chrysler 300.

The motor carrier has had one CMV, 2008 Chevrolet Eldorado, placed out-of-service in the previous twelve months. Silver Limousine did not provide any evidence that the OOS violations have been corrected and did not allow the FMCSA Safety Investigator access to the CMV.

The motor carrier out-of-service (OOS) rate could not be calculated. The motor carrier has had two CVSA Level II inspections in the previous twelve months. Silver Limousine did not grant the FMCSA Safety Investigator access to the requested CMV to conduct the third CVSA inspection to properly calculate Silver Limousine's OOS rate.

Follow on Action:

Prosecution is planned for this motor carrier in Part 382 and 383. The prosecution number is WA-2018-0042-US1616.

Documents Provided to the Carrier

The carrier was given information on how to access and use the FMCSA and CSA websites. The motor carrier was informed on where to find applicable forms, regulations, and other relevant information. The motor carrier was given information on how to access and file a DataQ through the DataQ website. The motor carrier was provided with Part A, Part B Violations, Part B recommendations, Table 1 Violations, Safety Fitness Rating Explanation, Carrier Corrective Action for Passenger Carriers, and How to Request an Upgrade. This investigation resulted in the motor carrier receiving a proposed "unsatisfactory" safety rating.

The motor carrier was sent a PDF, via email, on March 01, 2018, of "Education & Technical Assistance Program: A Motor Carrier's Guide to Improving Highway Safety".

Upload Authorized:	Yes	No	
Authorized by:			Date:
Uploaded:	Yes	No	Failure Code:
Verified by:			Date:



Washington State Department of Revenue

[Services](#) [Business Lookup](#) [SILVER TRANSPORTATION LLC](#)

License Information:

[New search](#) [Back to results](#)

Entity name: SILVER TRANSPORTATION LLC

Business name:

Entity type: [Limited Liability Company](#)

UBI #: 603-083-070

Business ID:

Location ID:

Location: None

Excise tax and reseller permit status: [Click here](#)

Secretary of State status: [Click here](#)

Governing People May include governing people not registered with Secretary of State

Governing people	Title
MIKE THOMAS,	
MILLER, CHRIS	
SILVER TRANSPORTATION LLC	

The Business Lookup information is updated nightly. Search date and time: 9/10/2019 11:18:36 AM

BUSINESS INFORMATION

Business Name:

SILVER TRANSPORTATION LLC

UBI Number:

603 083 070

Business Type:

WA LIMITED LIABILITY COMPANY

Business Status:

ADMINISTRATIVELY DISSOLVED

Principal Office Street Address:

117 NW 189TH STREET, RIDGEFIELD, WA, 98642, UNITED STATES

Principal Office Mailing Address:

Expiration Date:

01/31/2019

Jurisdiction:

UNITED STATES, WASHINGTON

Formation/ Registration Date:

01/31/2011

Period of Duration:

PERPETUAL

Inactive Date:

06/03/2019

Nature of Business:

TRANSPORTATION & WAREHOUSING

REGISTERED AGENT INFORMATION

Registered Agent Name:

CHRIS MILLER

Street Address:

117 NW 189TH STREET, RIDGEFIELD, WA, 98642-0000, UNITED STATES

Mailing Address:

GOVERNORS

Title	Governors Type	Entity Name	First Name	Last Name
GOVERNOR	INDIVIDUAL		CHRIS	MILLER
GOVERNOR	INDIVIDUAL			MIKE THOMAS

Title	Governors Type	Entity Name	First Name	Last Name
GOVERNOR ENTITY		SILVER TRANSPORTATION LLC	CHRIS	MILLER

Washington State Department of Revenue

[Services](#)
 [Business Lookup](#)
 [SILVER LIMOUSINE](#)

License Information:

[New search](#)
 [Back to results](#)

Entity name: MILLER, CHRIS ROBERT
Business name: SILVER LIMOUSINE
Entity type: [Sole Proprietor](#)
UBI #: 602-652-537
Business ID: 001
Location ID: 0001
Location: Closed
Location address: 117 NW 189TH ST
 RIDGEFIELD WA 98642-5777
Mailing address: 117 NW 189TH ST
 RIDGEFIELD WA 98642-5777

Excise tax and reseller permit status:
 [Click here](#)

Governing People *May include governing people not registered with Secretary of State*

Governing people	Title
MILLER, CHRIS ROBERT	

Registered Trade Names

Registered trade names	Status	First issued
SILVER LIMOUSINE	Active	Sep-29-2006
SILVER TRANSPORTATION	Active	Dec-22-2010

The Business Lookup information is updated nightly. Search date and time: 9/10/2019 11:06:18 AM

SharePoint

Newsfeed OneDrive Sites Hoxit, Jason (UTC) [Settings] [Help]



Companies

Cases

Search Company Name [Search Icon]

History Contacts Industries Cases

Cancel Permits & Insurance

[View Version History](#)

Company Name* Silver Transportation

DBA Names Silver Limousine

Company Legacy ID 18171

Unified Business Identifier 602-652-537

Regulatory Status Unregulated

Contact Name Chris Miller

Contact Title

Contact Phone

Contact E-Mail Address

Contact Fax

Address Change Date

Physical Address Street 117 NW 189th St.

Physical Address City Ridgefield

Physical Address State WA

Physical Address Zip 98642

Mailing Address Street 117 NW 189th St.

Mailing Address City Ridgefield

Mailing Address State WA

Mailing Address Zip 98642

Website

Comments Carrier applied for USDOT and name changed from A Silver Limousine to Silver Transportation. Updated Mar. 22, 2018.

Company ID 18,171

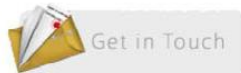
Version: 8.0

Created at 3/13/2017 6:18 PM by UTCSPSETUP (UTC)

Cancel



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Wine Tours

Silver Limousine takes great pride in presenting to you the best Oregon/Washington have to offer in Wine country. Our wine packages include everything you will need on your excursion. Call for the latest quotes, and availabilities.



Special Occasions

Birthdays, weddings, religious events, etc. Let us serve your transportation needs. We can accommodate large groups



Diverse Fleet

Towncars, Hummers, Excursions, we even have a party bus. Let us help you choose a car for your specific needs.

Allow us to introduce ourselves

At Silver Limousine you can expect things which no other Limousine will provide you. A distinctive difference in a crowded field is what makes us stand outside the box. We always decorate our Limousines up for your special occasion whatever that might be..

Clients testimonials

Chris, you made our wedding most memorable. Your courteous staff was prompt, and most professional. I have never used a limousine service that has excelled in the manner your company did. Thank you again.

Jim and Melinda Beaman - newlyweds

Links

- Knuckleheads
Cascades Blues Bar
Sportsmens Bar and Grill
Phatheadz
Glazed

Silver Limousine

Tel : 360 606 3861, 503-310-7776



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About

We promise both professionalism and friendliness to provide our customers with a personalized experience with our company. Here at Silver Limousine Service we pride ourselves in local knowledge, affordability, versatility, and friendliness in order give our customers the best Limo service

We are Silver Limousine Service, Executive Style Transportation



Chris

I believe the only way to truly operate a customer oriented business is to work dosely with our clients. I want direct feed back, so that I know how to truly give the ultimate transportation experience.

Silver Limousine

Tel : 360 606 3861, 503-310-7776

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Virtual Tour

Enjoy a tour of our fleet, and take a look inside the party bus

NWPIX.S.com

Virtual Tour
by
NW Pix

To view the tour in Full Screen mode, double-click the large picture or click the button below.

Full Screen

To exit the Full Screen mode, press the 'Esc' key.

Music On/Off

UP & DOWN LEFT & RIGHT ZOOM

All Party Bus White Excursion Hummer Lincoln

Silver Limousine

Tel : 360 606 3861, 503-310-7776



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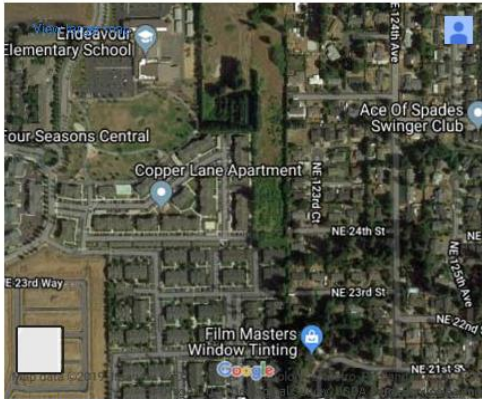
Contact

What ever your event, let us fill your transportation needs. No event to big, call us and see.

Get in Touch



Silver Limousine



View Larger Map

Silver Limousine

Tel : 360 606 3861, 503-310-7776

Contact Us

Your name: Merk Thomas

* Your email address: merk.e.thomasz06@gmail.com

* Confirm email address: merk.e.thomasz06@gmail.com

* Subject: Reservation Inquiry

* Your request or query: Hello, I'm looking to reserve your party bus for a company Christmas party on Dec 6 from 3pm-8pm. Our company is small (16 employees) and I'm interested in being picked up in Battle Ground at 3pm and driven to Vancouver, WA for dinner and drinks, and then driven back to Battle Ground. How much would I be looking at for this reservation?

Thanks, Mark

Send You must fill in the fields marked with a *



Mark Thomas <mark.e.thomasz06@gmail.com>

Re: Reservation Inquiry

3 messages

Chris <pdxlimo@gmail.com>
To: mark.e.thomasz06@gmail.com

Mon, Sep 16, 2019 at 11:50 AM

Hi Mark,

We could definitely do that for you! We are a small local company ourselves! Are you only transporting 16 people or would there be more than that? Our Party bus rentals start out at \$150 per hour and go up from there depending on which party bus is needed (size wise) 15 passenger (\$150), 18 passenger (\$165) or our 24 passenger (\$180). If you would like to give us a call we can discuss all of your options and details and give you the best possible rate, I look forward to hearing from you!

Thank you

On Tue, Sep 10, 2019 at 11:17 AM <mark.e.thomasz06@gmail.com> wrote:

name: Mark Thomas

Query: Hello, I'm looking to reserve your party bus for a company Christmas party on Dec 6 from 3pm-8pm. Our company is small (16 employees) and I'm interested in being picked up in Battle Ground at 3pm and driven to Vancouver, WA for dinner and drinks, and then driven back to Battle Ground. How much would I be looking at for this reservation?

Thanks, Mark

--

CONFIDENTIALITY NOTICE: The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from **disclosure** for any reason. No information received in this email or over the phone between Silver Limousine and the addressee(s) may be shared or released without written permission from Silver Limousine. This is for the safety and security of both the customer and the business.

Mark Thomas <mark.e.thomasz06@gmail.com>
To: Chris <pdxlimo@gmail.com>

Mon, Sep 16, 2019 at 1:38 PM

Thanks for you response, Chris.

The 15 passenger vehicle is most likely out of the equation. Which vehicle holds 18 passengers and which vehicle holds 24 passengers? I'd like to let my office vote on which vehicle they prefer, since the party is really about them. Once I have both answers, how do I go about booking the vehicle?

Thanks again,
Mark
[Quoted text hidden]

Chris <pdxlimo@gmail.com>
To: Mark Thomas <mark.e.thomasz06@gmail.com>

Wed, Sep 18, 2019 at 4:45 PM

We have Hummers Limos that seat up to 18 people as well as a party bus that seats 18 - 20 people and a 24 passenger party bus.

Thank you

[Quoted text hidden]

USDOT Number MC/MX Number Name

Enter Value:

Company Snapshot

SILVER TRANSPORTATION
USDOT Number: 3085952

ID/Operations | [Inspections/Crashes In US](#) | [Inspections/Crashes In Canada](#) | [Safety Rating](#)

Carriers: If you would like to update the following ID/Operations information, please complete and submit form [MCS-150](#) which can be obtained [online](#) or from your State FMCSA office. If you would like to challenge the accuracy of your company's safety data, you can do so using FMCSA's [DataQs](#) system.

Other Information for this Carrier <hr/> ▼ SMS Results ▼ Licensing & Insurance

Carrier and other users: FMCSA provides the Company Safety Profile (CSP) to motor carriers and the general public interested in obtaining greater detail on a particular motor carrier's safety performance then what is captured in the Company Snapshot. To obtain a CSP please visit the [CSP order page](#) or call (800)832-5660 or (703)280-4001 (Fee Required).

For help on the explanation of individual data fields, click on any field name or for help of a general nature go to [SAFER General Help](#).

The information below reflects the content of the FMCSA management information systems as of **10/06/2019**.

For more information about the **Out of Service** status of this company, click on [OOS Details](#).

Entity Type: CARRIER																															
Operating Status:	OUT-OF-SERVICE																														
Out of Service Date:	04/24/2018																														
Legal Name: SILVER TRANSPORTATION																															
DBA Name: SILVER LIMOUSINE																															
Physical Address: 117 NW 189TH ST RIDGEFIELD, WA 98642																															
Phone: (360) 606-3861																															
Mailing Address: 117 NW 189TH ST RIDGEFIELD, WA 98642-6777																															
USDOT Number: 3085952	State Carrier ID Number:																														
MC/MX/FF Number(s):	DUNS Number: --																														
Power Units: 4	Drivers: 5																														
MCS-150 Form Date: 01/24/2018	MCS-150 Mileage (Year): 3,000 (2017)																														
Operation Classification:																															
<input checked="" type="checkbox"/> Auth. For Hire Priv. Pass. (Non-business) State Gov't <input type="checkbox"/> Exempt For Hire Migrant Local Gov't <input type="checkbox"/> Private (Property) U.S. Mail Indian Nation <input type="checkbox"/> Priv. Pass. (Business) Fed. Gov't																															
Carrier Operation:																															
<input checked="" type="checkbox"/> Interstate <input type="checkbox"/> Intrastate Only (HM) <input type="checkbox"/> Intrastate Only (Non-HM)																															
Cargo Carried:																															
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">General Freight</td> <td style="width: 33%;">Liquids/Gases</td> <td style="width: 33%;">Chemicals</td> </tr> <tr> <td>Household Goods</td> <td>Intermodal Cont.</td> <td>Commodities Dry Bulk</td> </tr> <tr> <td>Metal: sheets, coils, rolls</td> <td><input checked="" type="checkbox"/> Passengers</td> <td>Refrigerated Food</td> </tr> <tr> <td>Motor Vehicles</td> <td>Oilfield Equipment</td> <td>Beverages</td> </tr> <tr> <td>Drive/Tow away</td> <td>Livestock</td> <td>Paper Products</td> </tr> <tr> <td>Logs, Poles, Beams, Lumber</td> <td>Grain, Feed, Hay</td> <td>Utilities</td> </tr> <tr> <td>Building Materials</td> <td>Coal/Coke</td> <td>Agricultural/Farm Supplies</td> </tr> <tr> <td>Mobile Homes</td> <td>Meat</td> <td>Construction</td> </tr> <tr> <td>Machinery, Large Objects</td> <td>Garbage/Refuse</td> <td>Water Well</td> </tr> <tr> <td>Fresh Produce</td> <td>US Mail</td> <td></td> </tr> </table>		General Freight	Liquids/Gases	Chemicals	Household Goods	Intermodal Cont.	Commodities Dry Bulk	Metal: sheets, coils, rolls	<input checked="" type="checkbox"/> Passengers	Refrigerated Food	Motor Vehicles	Oilfield Equipment	Beverages	Drive/Tow away	Livestock	Paper Products	Logs, Poles, Beams, Lumber	Grain, Feed, Hay	Utilities	Building Materials	Coal/Coke	Agricultural/Farm Supplies	Mobile Homes	Meat	Construction	Machinery, Large Objects	Garbage/Refuse	Water Well	Fresh Produce	US Mail	
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Fresh Produce	US Mail																														

[ID/Operations](#) | [Inspections/Crashes In US](#) | [Inspections/Crashes In Canada](#) | [Safety Rating](#)

US Inspection results for 24 months prior to: **10/06/2019**

Total Inspections: 1
Total IEP Inspections: 0

Note: Total inspections may be less than the sum of vehicle, driver, and hazmat inspections. Go to [Inspections Help](#) for further information.

Inspections:				
Inspection Type	Vehicle	Driver	Hazmat	IEP
Inspections	1	1	0	0
Out of Service	1	1	0	0
Out of Service %	100%	100%	%	0%
Natl Average % (2009-2010)	20.72%	5.51%	4.50%	N/A

Crashes reported to FMCSA by states for 24 months prior to: **10/06/2019**

Note: Crashes listed represent a motor carrier's involvement in reportable crashes, without any determination as to responsibility.

Crashes:				
Type	Fatal	Injury	Tow	Total
Crashes	0	0	0	0

[ID/Operations](#) | [Inspections/Crashes In US](#) | [Inspections/Crashes In Canada](#) | [Safety Rating](#)

Canadian Inspection results for 24 months prior to: **10/06/2019**

Total inspections: 0

Note: Total inspections may be less than the sum of vehicle and driver inspections. Go to [Inspections Help](#) for further information.

Inspections:		
Inspection Type	Vehicle	Driver
Inspections	0	0
Out of Service	0	0
Out of Service %	0%	0%

Crashes results for 24 months prior to: **10/06/2019**

Note: Crashes listed represent a motor carrier's involvement in reportable crashes, without any determination as to responsibility.

Crashes:				
Type	Fatal	Injury	Tow	Total
Crashes	0	0	0	0

[ID/Operations](#) | [Inspections/Crashes In US](#) | [Inspections/Crashes In Canada](#) | [Safety Rating](#)

The Federal safety rating does not necessarily reflect the safety of the carrier when operating in intrastate commerce.