

November 2, 2010

Mr. David W. Danner  
Executive Director and Secretary  
WUTC  
1300 S Evergreen Park DR SW  
Olympia, WA 98504-7250

Dear Mr. Danner:

We received your request for information regarding Docket T-101661. You cite RCW 81.04.070 and you may inspect our records at any time so please advise us if you intend to come to our offices for such inspection. Regarding 81.04.090, it relates to the forms of records that must be kept, but does not require we report information that we do not collect or calculate. Therefore we are unable to provide all the information you requested for the following reasons:

1. First, we do not retain records back further than three years, as required by the following WAC:

**WAC 480-30-056 Records retention, auto transportation company. (1) General provisions.** An auto transportation company must keep all business records and reports for at least three years following the date those documents are created unless otherwise specified in subsection (2) of this section or unless a longer retention period is required by another governmental body.

2. Regarding the spreadsheet for fuel type, annual dollars purchased, annual units purchased and average price we do not report any of these in our annual report other than to include fuel costs as part of the 4200 category for "transportation expense". There is no requirement for us to compile or maintain this information. The only item I can provide at this time is we purchase fuel in gallons. Some items you are requesting could be determined by staff by simple math calculations using data from our fuel surcharge requests and annual reports.

3. On the spreadsheet for fuel surcharge revenue and number of passengers we do not calculate fuel surcharge revenue as a separate item and there is no requirement to do so. Annual number of passengers is reported on our annual report.

4. Finally, our equipment list as of Jan 2009 was submitted to you in our request for extension of authority under Docket TC-090118 and is listed below. All vehicles use regular unleaded gasoline.

YEAR	MAKE/MODEL	VIN	PAX	COST	ID
2005	FORD E-350	1FBSS31L05HB31018	9	\$ 14,974.00	1
2008	FORD E-350	1FBSS31LX8DB19387	9	\$ 18,200.00	2
2004	FORD E-350	1FBSS31L84HA95688	9	\$ 8,200.00	3
2002	FORD E-350	1FBSS31L12HA73867	9	\$ 6,500.00	4
1997	FORD E-450 CHAMPION	1FDLE40S4VHB41746	20	\$ 10,800.00	5
2005	FORD E-450 AMERITRANS	1FDXE45S05HA09609	24	\$ 27,200.00	6
2006	FORD E-350	1FDWE35L26DB00405	14	\$	7

	STARCRAFT			32,100.00	
	FORD E-450			\$	
2007	STARTRANS	1FDXE45S17DA95524	24	48,300.00	8
	FORD E-450			\$	
2006	STARTRANS	1FDXE45S86DB33118	24	45,000.00	9
	FORD E-450			\$	
2008	STARTRANS	1FD4E45S68DB01189	24	60,870.00	10
	FORD E-450			\$	
2008	STARTRANS	1FD4E45S08DB17873	24	60,870.00	11

5. We are unable to provide any additional information since records are not available prior to October 2007.

In summary, you have received virtually all of the information needed to determine what you are asking for by reviewing existing annual reports, applications for extension of authority or monthly fuel surcharge requests. We find it most disturbing that staff is requesting this information after the fact of the September 30<sup>th</sup> meeting and is now asking the stakeholders to provide information to support staff's recommendation to rescind Order 2.

John Solin  
Mike Lauver  
SEATAC SHUTTLE, LLC