

Bob Ferguson ATTORNEY GENERAL OF WASHINGTON

Utilities and Transportation Division PO Box 40128 • Olympia WA 98504-0128 • (360) 664-1183

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June 17, 2021

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COMMISSIO

Mark L. Johnson Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE P.O. Box 47250 Olympia, WA 98504-7250

RE: In the Matter of Determining the Proper Carrier Classification of and Complaint for Penalties against Black Tie Limousines, Inc. d/b/a Black Tie Wine Tours, Black Tie, Black Tie Transportation, and Walla Walla Wine Tours Docket TE-190303

Dear Mr. Johnson:

Commission Staff (Staff) has reviewed the response provided by Black Tie Wine Tours (Company). While the Company is now licensed as a limousine carrier through the Washington Department of Licensing (DOL), Staff maintains that the Company: (1) stipulated to the conditions in Order 02 in this docket; (2) testified it would operate as a limousine carrier through DOL to be exempt from the Commission's regulation; (3) was not licensed as either a for-hire or limousine carrier through DOL when it offered Staff transportation service; and (4) operated as charter party and excursion service carrier without authority from the Commission. Staff sustains its recommendation that the Commission should impose the penalty suspended in Docket TE-190303.

Sincerely,

/s/ Joe M. Dallas, WSBA No. 54506 Assistant Attorney General Office of the Attorney General Utilities and Transportation Division P.O. Box 40128 Olympia, WA 98504-0128 (360) 995-2819 joe.dallas@utc.wa.gov

JMD/emd cc: Parties