

**WILLIAM H. PIKE
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July 18, 2016

Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket TC-106821

To the Members of the Commission:

Greetings,

My name is William Pike and I am employed by San Juan Transit, Tours and Charters, LLC of Friday Harbor, Washington. I am writing to you to express my support for a protest filed with the Commission by Mr. Kraig D. Hansen, my employer and the owner of the company, regarding the above referenced docket number.

I have an extensive personal background in transportation management, operations, scheduling and marketing and while I work in a variety of positions with San Juan Transit, I will limit my comments on this application to its potential impact on the scheduled transit service component of the company's operation.

As its name implies, San Juan Transit, Tours and Charters provides a variety of transportation services within San Juan County. I should point out, however, that the company conducts each type of business, transit, tours and charters, independently of the other two, utilizing a fleet of 10 vehicles with capacities ranging from 14 to 28 passengers and with services provided throughout the county. The majority of the scheduled transit services are offered on San Juan Island.

Without restating facts that are undoubtedly familiar to the Commission, I think it is important to recognize that San Juan County is unique within the counties of Washington State in that it is the only county which cannot be accessed directly by automobile. This fact severely limits the ability of individuals, both residents and visitors, to provide their own transportation within the county as vehicular access to any of the islands is dependent on the availability of space on the Washington State Ferries which link the four largest islands to the city of Anacortes and to the rest of the state. In January of 2015, the ferry service implemented an advance reservation program for vehicles traveling from Anacortes to each of the four islands in San Juan County and for vehicles returning to Anacortes from Orcas and San Juan Islands. One of the unexpected consequences of this program has been a substantial increase in the number of passengers who have chosen to leave their automobiles in Anacortes and travel to the islands as foot passengers. During the summer of 2015, foot passenger traffic increased by more than 5% over the previous year and while the numbers for 2016 are obviously incomplete, the passenger counts for the Memorial Day, 2016 holiday weekend continue to reflect the same levels of significant growth.

With this growth in mind, Mr. Hansen and I spent the latter part of 2015 and the first three months of 2016 developing a transit schedule and a marketing plan for San Juan Island that would address the anticipated increase in demand during the upcoming summer season. San Juan Transit has been operating on San Juan Island for more than two decades and has consistently provided a reliable transit service during the summer months when the demand is highest and vehicle space on the ferries is most difficult to secure. During the past winter, the company acquired four additional buses in order to provide a level of capacity commensurate with demand. For its summer, 2016 season, the company published an entirely revised transit schedule featuring 14 daily departures from the Friday Harbor ferry terminal between the hours of 9:00 a.m. and 6:30 p.m. Operating over a route system that includes 11 other scheduled stops, the company has been able to offer its riders more than 750 different daily combinations of departure and arrival times throughout the island. Obviously the majority of the company's riders are visitors to San Juan Island who have arrived on the ferry without their own transportation but the company also counts bicyclists,

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campers, private boaters and residents among its customer base, individuals who may have their own transportation but who find the San Juan Transit service to be both convenient and inexpensive. In many respects and to many of the company's riders, San Juan Transit is providing a necessary and essential transportation service on San Juan Island.

As I mentioned above, San Juan Transit does not intermix its transit, tour and charter operations. While the drivers of all of the company's vehicles are knowledgeable about the islands and can provide a running narration for the benefit of first time visitors, the drivers serve as tour guides primarily on trips that are specifically sold as tours. On charter trips, if there is a narration, it is most commonly provided by the client rather than the driver. The transit service is operated first and foremost as a means of quick, frequent, reliable and inexpensive scheduled bus service between the various points on San Juan Island.

My personal knowledge of Friday Harbor Jolly Trolley, Inc. is limited to that company's own promotional literature, its web site, the information provided in the docket and my own observations. While I would not be surprised to learn that Jolly Trolley offers charters, I consider the company to be a tour operator. Their web page describes their narrated tour and their brochure promotes their service as "Friday Harbor's Best Sightseeing Tour." The information in the docket states much the same thing and includes a statement that, "The company asserts the service is not an essential transportation service, is solely for recreation and tourism."

I would submit that the transit service provided by San Juan Transit and the tours offered by Friday Harbor Jolly Trolley constitute two distinctly different transportation services. If the Jolly Trolley tours are to include a "hop on and off" component, I am inclined to believe that the tour operation will likely become a transit operation, essentially duplicating the service that San Juan Transit has been and continues to provide on a regular and reliable basis, rain or shine, seven days a week. Just as San Juan Transit makes it a company policy not to intermix its transit, tour and charter operations, I would question the wisdom of the Utilities and Transportation Commission endorsing the application of any operator to mix its operations in such a manner. With a customer base for both companies that frequently includes first time passengers who may not be able to distinguish between a transit and a tour service, it is incumbent upon the operators and the UTC to make it clear and obvious to the consumer that there are two different types of transportation being offered to the public. For this reason, I regard the approval of the Friday Harbor Jolly Trolley application to include the "hop on and off" feature as setting an ill-advised precedent and urge the Commission's disapproval. Please consider this letter to constitute my protest of the above-referenced application.

Respectfully submitted,



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cc: Kraig D. Hansen