

April 7, 2011

Mr. David Danner
Washington Utilities and Transportation Commission
1300 S Evergreen Park DR SW
PO Box 47259
Olympia, WA 98504-7250

Subject: Dockets TC-101661 and A-042090

Dear Mr. Danner:

Please insure delivery of this to the Commissioners and post it to the above 2 dockets.

After nearly 7 months of discussions, meetings, phone calls, emails, hearings, open meetings and every other type of correspondence both verbal and written, there is only one fact that is clear to us and the auto transportation industry. The staff is hell bent on destroying this industry.

We are absolutely dumb-founded as to why staff, specifically Mr. Gene Eckhardt, continues to insist that he has no faith or confidence in our fares and thus is trying to make a totally false and unsubstantiated argument that it is also time to remove the fuel surcharge methodology. This process has served not only the companies and their customers but also the Commission for over 11 years.

With records fuel prices on the horizon, how can a fuel surcharge NOT be the right method to help offset our rising fuels costs? We do not "make" money on fuel surcharges. They only partially allow us to recover an upward spiraling cost and in most cases represent an increase in the total fare to our customers of less than 2% and historically it was less than 1% for the past 11 years.

Mr. Eckhardt is forcing the industry into rate hearings in lieu of fuel surcharges, which are inappropriate in dealing with spikes in expenses. In addition, he continues to hang onto the 93% operating ratio.

After reading the entire 17 page discussion of this ratio, done by Edward Nikula in 1991, as it relates to the solid waste industry, I cannot find ONE entry in the entire document about airport shuttles.

Here is the link:

<http://wutc.wa.gov/rms2.nsf/177d98baa5918c7388256a550064a61e/fe50d0571499b1978825718c0069a516!OpenDocument>

The ratio was started in the 40's, adapted in the 60's and 70's by the UTC for various industries and again in the 90's. There was NO justification to adapt that ratio to airport shuttles and Larito

and Gallagher were NEVER hired to look into how the ratio applied to airport shuttles. They only looked at the solid waste industry.

Now, after all these years, Mr. Eckhardt is still claiming that this ratio is appropriate to airport shuttles. Airport shuttles didn't even exist when the L/G studies were being done and they certainly don't apply to our industry today. We are not a railroad, we are not an over the road trucker, we are not a solid waste company and we are not a monopolistic utility. We should not be treated as such and we do not fit the model that L/G studied. Do we need to hire L/G to prove us right?

Mr. Richard Asche, has suggested banded rates, similar to the State of Illinois. This is working in Illinois and it can work in Washington State. Commissioners, please give this method your serious attention. Let's give it a try, You can always revoke it. Our industry needs help and the staff at UTC is not providing any help to us whatsoever.

Sincerely,

John Solin
SEATAC SHUTTLE, LLC