



Rob McKenna

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September 1, 2006

Dennis J. Moss  
Administrative Law Judge  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
P. O. Box 47250  
Olympia, Washington 98504-7250

Re: *WUTC v. Boots, Inc. d/b/a Brooks A & A Moving*  
Docket No. TV-060855

Dear Judge Moss:

Staff submits this letter to clarify the basis of the calculations in footnote 14 on page 12 of the Initial Order filed August 30, 2006.

Staff assumes that the calculation of twenty percent in the footnote is based on the penalty amount of \$65,600 (¶ 40 of the Initial Order) and on the \$313,748.30 in revenue (¶10) referenced in staff's audit report. The source of this number is the commission record of the company's 2004 annual report filing. Staff notes, however, that the 2004 revenue reported to the commission presumably reflects revenue from 2004 operations only for the period after the company received its temporary operating authority on June 21, 2004. Assuming that the reported revenue is based on a period of a little over six months, then the \$65,600 penalty would represent less than twenty percent of the company's revenue if compared to a full year's worth of revenue.

If we look at 2005, for which the company reported annual revenue of \$557,680, the penalty represents closer to 12% of the company's annual revenue.



Should the commission require any additional information or have any questions, staff stands ready to assist.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jennifer Cameron-Rulkowski".

JENNIFER CAMERON-RULKOWSKI  
Assistant Attorney General

JCR:emd  
Enclosure  
cc: Parties