

**From:** Jim Fricke [mailto:jimf@capair.com]  
**Sent:** Friday, March 29, 2013 6:56 PM  
**To:** 'Jim Fricke'; Rendahl, Ann (UTC); Rose, Chris (UTC)  
**Cc:** johnf@capair.com  
**Subject:** RE: UTC Rulemaking--Policy Statement

Commission and Staff,

To reiterate, the UTC should be concerned about balancing the impact on the current public need being served with the expected increased benefit proposed.

Thus, the beginning point should be a policy statement such as suggested in the draft below. This policy statement should be the backdrop for rules relating to applications proposing overlapping service. If all factors are analyzed in a balanced and sustainable manner, then the greatest public need(s) should be addressed.

Definitions. "same" needs to be defined as substantially the same or similar. "public need and necessity", "fair, just, reasonable...", "satisfaction of the Commission" all need to be specifically defined as used in 480-30. "Door to door" and "scheduled service" are not mutually exclusive—we provide scheduled door to door van service.

Prefer 25%band(Illinois law)

Thanks, Jim Fricke

**From:** Jim Fricke [mailto:jimf@capair.com]  
**Sent:** Wednesday, March 13, 2013 3:38 PM  
**To:** 'Rendahl, Ann (UTC)'; 'Rose, Chris (UTC)'  
**Cc:** 'johnf@capair.com'  
**Subject:** FW: UTC Rulemaking--Policy Statement

Commission and Staff,

Since we are all concerned about the benefits to the public in general, and the traveling public in particular, WAC 480-30 should begin with policies/principles to ensure stability and sustainability when considering new or responding to increasing public needs. The goal should be to maximize the public benefit in a stable and sustainable manner.

Also attached are additional proposed rule draft changes not included in the consolidated notes sent by Shuttle Express.

Thanks,  
Jim Fricke  
Capital Aeroporter  
360.292.7686

**From:** Jim Fricke [mailto:jimf@capair.com]  
**Sent:** Tuesday, March 12, 2013 5:36 PM

**To:** 'John Rowley'; 'jimysh@attglobal.net'; 'REAsche@aol.com'; 'richard@airporter.com'; 'John Solin'; 'mike@seatacshuttle.com'  
**Cc:** 'Steve Salins'; 'johnf@capair.com'; 'jkwin@comcast.net'  
**Subject:** UTC Rulemaking--Policy Statement

Gentlemen:

It seems to me that the proposed rule draft needs a public policy section/paragraph at its beginning to express general/traveling public benefits. Here is a proposed draft.

Thanks~Jim

-DRAFT-

**PUBLIC PURPOSE.** It is to the public benefit that public transportation companies provide public transportation services by means of auto transportation companies, and, charter and excursion carriers. High occupancy motor vehicles operated by these companies result in private vehicle trip reduction. This leads to more efficient use of our highways, reduced fuel consumption, and lessens emissions impact upon our environment.

**AUTO TRANSPORTATION.** It is to the benefit of the traveling public to provide a stable and sustainable framework in which auto transportation services can be made available as an alternative to private vehicle travel. The framework of this alternative should provide for safe, convenient, frequent, comprehensive and sustainable passenger transportation services to meet the broadest public need in an economically viable manner. To this end, it is important to maintain stability and sustainability in existing services when considering new services.

**CHARTER AND EXCURSION.** It is to the benefit of the traveling public to provide for safe, convenient and sufficient transportation services for groups to participate in special activities.