

From: [Rose, Chris \(UTC\)](#)
To: [UTC DL Records Center](#)
Subject: FW: Your town car service
Date: Thursday, March 16, 2017 1:51:50 PM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Please include this in the record for TC-161262. Thank you.

From: Wesley Marks [mailto:wmarks@shuttleexpress.net]
Sent: Friday, March 10, 2017 9:52 AM
To: Rose, Chris (UTC) <crose@utc.wa.gov>
Subject: RE: Your town car service

Hi Chris,

The short answer to your questions are yes. All of our independent contractors who operate our town car service (we don't own and operate any of these vehicles/services on our own) are licensed by DOL as limousine carriers. The services they can offer through the DOL are single-party private transfers between locations in sedans (town car is simply a marketing term on our end), limousines, SUV's, some small buses (I believe they have to be under 14 passengers) and vans (such as 7 or 10 passenger vans we operate). Shuttle Express' current waiver allows us to use contractors who are registered limousine carriers, which is a requirement placed on the business operating the vehicles, not necessarily the driver of the vehicle. The driver is required to be qualified, but that qualification can come through the limousine credential program (such as through Alliance 20/20) or through the county For Hire licensing programs. The business must list and register (through DOL) all of their drivers, and is obligated to maintain the records proving that the driver is properly licensed, trained, tested (both skills/knowledge, as well as mandatory drug testing), and background/driving record screened.

Shuttle Express does hope that this rulemaking will allow for our current waiver to either continue, or be dropped in place of the new rules which would again allow use of contractors licensed and regulated to a similar high standard as UTC and/or DOL.

I hope that helps, but if you have any more questions, please feel free to shoot me an email. I'll be out of the office through Thursday next week attending a limousine convention, but will be checking in regularly.

--

Wesley Marks

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From: Rose, Chris (UTC) [<mailto:crose@utc.wa.gov>]

Sent: Friday, March 10, 2017 8:47 AM

To: Wesley Marks <wmarks@shuttleexpress.net>

Subject: Your town car service

Wesley,

I have a follow up question to the rulemaking workshop (TC161262).

I understand Shuttle Express has a “town car” service. Are those services and vehicles/drivers regulated under the DOL limousine law (46.72A), or under the DOL for-hire law (46.72)? Does Shuttle Express hope to include use of town cars under any amended rule that allows contracting with drivers/vehicles?

I’m just trying to make sure I understand the scope of your suggested changes, and frankly I’m not familiar with town car services (beyond what I read about on your website) and whether/how they are different from limousines (if at all).

Thank you.

Chris