

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

Application of

ROMAN SOLUTIONS, LLC d/b/a
ROCKET TRANSPORTATION

For a Certificate of Public Convenience
And Necessity to Operate Motor Vehicles in
Furnishing Passenger and Express Service as
an Auto Transportation Company.

DOCKET NO. TC-061847

DECLARATION OF
PENNY INGRAM

I, PENNY INGRAM, under penalty of perjury under the laws of the state of Washington, declare as follows:

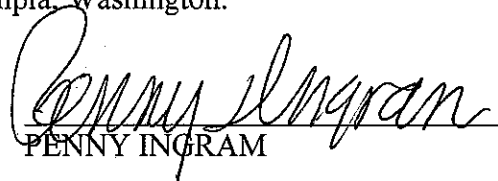
1. I am over 18 years of age, a citizen of the United States, a resident of the state of Washington, and competent to be a witness.
2. I am employed by the Washington Utilities and Transportation Commission and have been since 1991. Since April 2004 I have held the position of Regulatory Analyst 2 in the Commission's Water and Transportation Section.
3. My duties include reviewing applications for certificates of public convenience and necessity to operate motor vehicles in furnishing passenger and express service as an auto transportation company. As part of my review, I determine whether the application is complete and whether there are any outstanding issues involving the applicant, the application, or the proposed service that must be resolved before a certificate may be issued. This has been part of my regular work responsibilities since approximately 2006
4. On December 6, 2006, the Commission received an application from Roman Solutions, LLC d/b/a Rocket Transportation ("Applicant" or "Rocket"), for a certificate of public convenience and necessity to operate motor vehicles to furnish passenger service as an auto transportation company providing door-to-door passenger service, by reservation only, to and from Jefferson and Clallam counties, serving various points in Kitsap County, King County, and Pierce County.
5. On March 12, 2007 the Commission received a protest to the application filed by Evergreen Trails, Inc., d/b/a Gray Line of Seattle. On March 16, 2007, the Commission received protests to the application filed by Bremerton-Kitsap

Airporter, Inc. and Heckman Motors, Inc. d/b/a Olympic Bus Lines. On March 30, 2007, Capital Airporter filed a protest to the application. Both before and after the case was scheduled for hearing, the parties conducted Settlement negotiations. Although not a formal party to the Settlement, Staff actively consulted with the parties during negotiations after the prehearing conference. This culminated in a Settlement filed with the Commission on July 5, 2007, which resolves all of the issues between them in this docket and results in an uncontested application for authority. The terms of the Agreement amend and restrict the certificate authority sought in Rocket's application. The Settlement, in part, amends the Applicant's authority to state "on demand" and "all passengers must have their origin and destination in Jefferson or Clallam Counties." The Agreement also amends the proposed "time schedule" in the application.

6. This Declaration is intended as a statement of Staff's support for the Settlement filed, review of the relevant evidence in this proceeding, and its satisfaction that the requisite showings have been made by the Applicant in its application for authority.
7. Staff believes the restrictive amendments to the proposed certificate, as stated in the Settlement, are appropriate, having consulted with the parties during negotiations. Staff also finds that, because the authority is "on demand" by reservation only, the amendment to the time schedule (Item 10) in the Settlement agreement is appropriate.
8. Staff believes that the Settlement is in the public interest, and avoids the time and expense of a contested hearing. The Settlement agreement appears to satisfy the interests and concerns of all protestants and provides for their withdrawal, resulting in an uncontested hearing. To Staff's knowledge, there are no objections to the proposed Settlement.
9. I personally reviewed the Applicant's initial application and supporting documentation. Supporting documentation included statements by the Applicant describing the proposed service, the conditions that justify the proposed service, a time schedule, route map and route description, and passenger fare schedule. It also included a balance sheet and profit and loss statement, a statement of equipment to be used in connection with the proposed service, and statements of prior experience. The application did not include pro forma financial statements and ridership and revenue forecasts for the first twelve months of operation as required. The applicant will need to file these documents prior to the Commission issuing the permit.
10. After review of the Applicant's application and supporting materials, I have concluded that the application itself is complete. With the filing of two additional documents, the financial information is complete, and contains evidence satisfying each of the factors the Commission is to consider as listed in WAC 480-30-096.
11. The Applicant describes a fleet of vehicles in its application. This appears sufficient to initiate the proposed service.

12. To describe prior experience, the Applicant explains that Rocket Transportation, under contract with Paratransit Services, Inc. and Clallam Transit, and also as a service provider for Labor and Industries, has been providing for-hire transportation services for over a year, and charter and excursion services for six months. In its memorandum, the Applicant describes the relevant experience of its three principles who own and operate Rocket Transportation. The Applicant appears to demonstrate sufficient operating experience.
13. The application satisfies the minimum requirements by including a proposed passenger tariff schedule.
14. Staff finds no outstanding compliance or other actions by the Applicant before the Commission, so Staff has no reason to be concerned that the Applicant will fail to comply with regulations in the future.
15. The Applicant has described the need for proposed service in its application and its Memorandum in Support of its application. As required by WAC 480-30-136(i), the Applicant's own statements of public need must be supported by testimony of independent witnesses who would use the service or are knowledgeable about the need for service, in order to demonstrate that public convenience and necessity support the proposed application. The Applicant has appeared to satisfy this requirement with the submission of signed declarations and an intention to call independent witnesses at hearing to testify regarding public need.
16. Based on the above, I recommend that the Commission approve the Settlement and grant the authority sought by the applicant, subject to compliance with the additional requirements of WAC 480-30 and RCW 81.68 prior to a certificate being issued. This includes working with staff to file a Form "E" Certificate of Insurance.

DATED this 10 day of July 2007 at Olympia, Washington.


PENNY INGRAM