

**Exhibit No. DP-2
Dockets TC-143691, TC-160516,
TC-161257 (consolidated)
Witness: David Pratt**

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**In re the Application of
SPEEDISHUTTLE WASHINGTON,
LLC d/b/a SPEEDISHUTTLE SEATTLE
For a Certificate of Public Convenience
and Necessity to Operate Motor Vehicles
in Furnishing Passenger and Express
Service as an Auto Transportation
Company**

**DOCKETS TC-143691, TC-160516,
TC-161257 (consolidated)**

SHUTTLE EXPRESS, INC.,

Complainant,

v.

**SPEEDISHUTTLE WASHINGTON,
LLC d/b/a SPEEDISHUTTLE
SEATTLE,**

Respondent.

**SPEEDISHUTTLE WASHINGTON,
LLC d/b/a SPEEDISHUTTLE
SEATTLE,**

Complainant,

v.

SHUTTLE EXPRESS, INC.,

Respondent.

EXHIBIT TO TESTIMONY OF

David Pratt

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Staff Investigation of Report, March 2017

March 17, 2017

STAFF INVESTIGATION
OF
SHUTTLE EXPRESS, INC.

DOCKET TC-161257

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March 2017

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EXECUTIVE SUMMARY

This investigation focuses on Shuttle Express' alleged use of independent contractors (vehicles and drivers not owned or employed by the company) in violation of WAC 480-30-213.

On December 1, 2016, in docket TE-161257, Speedishuttle Washington LLC d/b/a Speedishuttle Seattle (Speedishuttle) filed with the Commission a formal complaint against Shuttle Express, Inc. (Shuttle Express). In its complaint, Speedishuttle alleges that Shuttle Express has violated RCW 81.28.080 and WAC 480-30-391 by providing unauthorized commissions (rebates), and violated WAC 480-30-213 by using independent contractors to provide auto transportation service.

On January 24, 2017, Commission staff submitted a data request to Shuttle Express for documentation of each occurrence between January 16, 2014 and September 29, 2016 in which Shuttle Express used an independent contractor to provide any type of transportation service.

Shuttle Express responded by providing an Excel spreadsheet listing 40,727 individual trips in which the company used an independent contractor to provide previously booked auto transportation service. Each trip listed was either to or from SeaTac Airport. Staff narrowed the period of review under RCW 4.16.100(2) to a period beginning December 1, 2014 and ending September 29, 2016. This reduced the number of occurrences to 35,351.

On February 14, 2017, Staff visited Shuttle Express' base of operations and learned that Shuttle Express does not consider it cost-effective to send a shuttle van for only one customer. For those customers who are the only ones traveling from a particular area at a particular time, Shuttle Express believes it makes more sense economically to use an independent contractor to provide the pre-scheduled transportation. This decision is made by the dispatcher in the final hours leading up to the scheduled transportation.

Staff believes this practice is in violation of WAC 480-30-213, circumvents Commission safety regulations and potentially places the traveling public at risk. The Commission has no oversight of independent contractors with respect to driver qualifications, medical examination and certification, hours of service, vehicle maintenance and inspection, and other issues.

This is the third investigation resulting in violations against Shuttle Express for using independent contractors. As allowed by RCW 81.04.380, the Commission could penalize Shuttle Express up to \$1,000 per violation for each of the 35,351 violations that occurred between December 1, 2014, and September 29, 2016.

PURPOSE, SCOPE, AND AUTHORITY

Purpose

The purpose of this investigation is to determine if Shuttle Express's use of independent contractors violates commission rules.

Scope

The investigation focuses on information obtained by commission staff relating to Shuttle Express's operations.

Authority

Staff undertakes this investigation under the authority of the Revised Code of Washington (RCW) 81.01.010, which adopts RCW 80.01, directing the commission to regulate passenger transportation providers in the public interest, and to adopt such rules and regulations as may be necessary to do so. In addition, RCW 81.04.510 makes it clear that the commission is authorized to conduct such an investigation. Appendix A includes copies of relevant laws and rules.

BACKGROUND

Shuttle Express has held a certificate of public convenience and necessity as a passenger transportation company since 1989 and provides auto transportation services in King, Pierce, Snohomish, and Island counties. Shuttle Express is located at 800 Southwest 16th Street, Renton, Washington, 98057. Shuttle Express is entirely owned by JKS Trust. Paul Kajanoff is the company's president. In its 2016 Annual Report, Shuttle Express reported \$9.2 million in gross intrastate auto transportation revenues for 2016.¹

WAC 480-30-213 requires that vehicles operated by a passenger transportation company, including auto transportation companies, be owned by or leased to the certificate holder. In addition, the driver of such a vehicle must be the certificate holder or an employee thereof. A company using an independent contractor to provide and operate a vehicle on its behalf to provide auto transportation service is in violation of this rule.

There have been four recent Commission actions involving use of independent contractors by Shuttle Express:

- In July, 2008, the commission issued a penalty assessment against Shuttle Express under docket **TC-072228** in the amount of \$9,500 for 95 violations of WAC 480-30-213(2), using independent contractor drivers.
- In March, 2014, in docket TC-120323, the commission found that Shuttle Express committed a total of 5,715 violations of WAC 480-30-213(2). Staff filed a complaint in that case and recommended a \$250,000 penalty, which represented the approximate amount of revenues retained by Shuttle Express from its independent contractor program. The final outcome of that case was that the commission issued a \$60,000 penalty to the company.
- On December 12, 2013, the Commission approved a petition under docket **TC-132141** granting Shuttle Express a temporary and conditional exemption from WAC 480-30-213(2). The exemption allowed Shuttle Express to use independent contractor drivers for a 30-day period through the December holidays. The exemption ended January 15, 2014.
- On September 30, 2016, the Commission approved a petition under Docket **TC-160819** granting Shuttle Express a limited and conditional exemption from WAC 480-30-213. The exemption allowed Shuttle Express to use independent contractor drivers for a 10-month period beginning September 30, 2016.

¹ Shuttle Express 2015 Annual Report, Appendix B.

INVESTIGATION

Formal Complaint

In its complaint, Speedishuttle alleges that, outside of approved waiver or exemption periods, Shuttle Express substituted independently owned limousines and town cars operated by independent contractors in place of its own vehicles and drivers for scheduled auto transportation services. As evidence of such substitution, Speedishuttle provided a screen shot of a comment posted on June 10, 2016, by a customer, Meg Wilkinson, on Shuttle Express' Facebook page. In her post, Ms. Wilkinson provides a negative review of her experience with Shuttle Express. Ms. Wilkinson states she waited over an hour at SeaTac for her ride, and that eventually Shuttle Express sent a town car for her.

Data Request

On January 24, 2017, Commission Staff submitted a data request to Shuttle Express pursuant to WAC 480-07-400. Included in the data request was documentation of "each occurrence in which Shuttle Express used an independent contractor to provide any transportation service, including shared ride, rescue, luxury upgrade, or any other term used by Shuttle Express to describe the provision of transportation services." The data request covered a period of time beginning January 16, 2014 and ending September 29, 2016.

For each occurrence identified above, staff requested "the date of service, the independent contractor's name, the trip's origin(s) and destination(s), the customer's name(s), the type of transportation provided (shared ride, rescue, luxury upgrade, or any other term used by Shuttle Express to describe the provision of transportation services), the number of stops, and the amount of revenue generated (including total cost to the customer and a breakdown of how much went to the independent contractor and how much Shuttle Express retained)."²

Shuttle Express responded by providing an Excel spreadsheet containing details of 40,727 individual trips originally booked as auto transportation then switched to an independent contractor. Pursuant to RCW 4.16.100(2), any violations discovered are subject to a two-year statute of limitations running backwards from December 1, 2016, the date Speedishuttle filed its complaint. As a result, staff limited its investigation to a period of time beginning December 1, 2014 through September 29, 2016.³ This reduced the number of trips to 35,351. For each trip,

²Staff Data Requests 1-7 to Shuttle Express. Appendix C.

³Under RCW 4.16.100(2), staff narrows its investigation to a period of time beginning two years prior to the Speedishuttle complaint and ending with the effective date of the most recent waiver under TC 160819, December 1, 2014 through September 29, 2016.

Shuttle Express provided the date, reservation ID, number of stops, trip ID, pickup location zip code, drop-off location zip code, base fare, and amount of fare received by the contractor.⁴

Staff accepts the data provided by the company at face value and assumes that the data is a true and correct representation of reservation and trip records located within the company's database.

Site Visit

On February 14, 2017, Transportation Safety staff⁵ visited Shuttle Express' facility in Renton, WA to learn more about the company's reservation and dispatching procedures. Staff met with company officials Paul Kajanoff and Wesley Marks. Staff learned that each of the 40,727 trips identified through the data request was a trip originally booked by a customer, either going to or coming from SeaTac Airport. Each trip was a single-stop ride, in other words, the customer was picked up and delivered directly to the airport or to their home without making additional stops along the way.

Staff observed Shuttle Express' dispatch center, which appeared to be an efficient, high-tech operation. An electronic wall map depicts Shuttle Express' coverage area. The dispatcher is able to observe Shuttle Express' company owned vans, as well as independent contractors, on this electronic wall map. Individual icons denote each vehicle and report the vehicle type (owned or independent), availability, and speed. Independent contractor vehicles appear on the map alongside company owned vehicles as resources available to the dispatcher as needed.

In order to understand how, when and why the decision is made to substitute an independent contractor in place of a company driver and vehicle, staff randomly selected a trip from among the data provided. Mr. Marks looked up the trip details and explained that this was an early-morning, shared-ride reservation from South King County to SeaTac Airport. Shuttle Express dispatchers reviewed upcoming reservations and in this case, there were no other reservations in that area at that time of day, so the customer would have been the only one in the van. It is not cost-effective to send a company van and driver for only one passenger. Under this scenario, the dispatcher followed the company's practice to assign the transportation to an independent contractor.

Staff inquired if this involves a cancellation of the auto transportation reservation, and how the reservation system handles this change. Mr. Marks stated the reservation is not cancelled. "Cancellation creates lots of hassle." To cancel the reservation would require refunding a credit card payment and requiring the customer to pay again. For the customer the entire process

⁴Shuttle Express Response to Staff Data Request #2, Appendix D.

⁵Assistant Director David Pratt, Compliance Investigator Michael Turcott, and Motor Carrier Safety Investigator Mathew Perkinson.

appears seamless. So that the customer is not alarmed, Shuttle Express notifies them to expect an independent contractor vehicle to pick them up in place of a Shuttle Express van. This notification takes place via telephone call or text message.

The original reservation is not cancelled, and the customer pays the published tariff rate for their trip. Shuttle Express keeps a portion of the fare and a portion goes to the independent contractor.

STAFF FINDINGS AND RECOMMENDATION

Findings

Commission staff has determined that Shuttle Express violated WAC 480-30-213(1) and (2) by operating vehicles not owned by the company and operated by drivers who are not employees. This occurred 35,351 times from December 1, 2014 through September 29, 2016.

"Auto transportation company" means every person owning, controlling, operating, or managing any motor-propelled vehicle not usually operated on or over rails, used in the business of transporting persons over any public highway in this state between fixed termini or over a regular route, and not operating exclusively within the incorporated limits of any city or town."⁶ This rule does not require multiple stops to or from the airport for the trip to fall under auto transportation rules.

The 35,351 trips are clearly auto transportation. Each trip is either to or from SeaTac Airport, a fixed terminal. Each trip was originally booked as shared van service and moved to an independent contractor solely for the financial and logistical benefit of Shuttle Express.

The 35,351 trips remained under the control and management of Shuttle Express. The customer made their reservation through and made payment to Shuttle Express. When Shuttle Express assigns work to its independent contractors, it is controlling and managing these vehicles and drivers as if they were its own by tracking their availability, location and speed.

Under WAC 480-30-213, auto transportation companies are required to use their own vehicles operated by their own employees to provide regulated transportation services. Auto transportation companies are required to comply with rigorous standards relating to driver qualifications, medical examination and certification, and vehicle inspection and maintenance. These regulations are enforced through periodic safety investigations by Commission staff. Independent contractors (limousine operators) do not fall under UTC authority and are not held to the same safety standards.

With respect to hours of service, Independent contractors are not held to the same standard as regulated drivers. The company has no understanding of how the independent contractors are spending their time when not working for them. Driver fatigue is a significant factor in traffic fatalities.

⁶ WAC 480-30-036

Recommendation

The commission could penalize Shuttle Express up to \$1,000 per violation for 35,351 total violations of commission rules, as provided by RCW 81.04.380. Through its enforcement policy, the commission considers the following factors when determining the level of penalty to be imposed:

Factor 1 - How serious or harmful the violation is to the public.

Use of independent contractors by auto transportation companies is serious and potentially harmful to the public. Non-regulated drivers and vehicles are not held to the same safety standards as regulated companies.

In the current investigation, Shuttle Express would not identify its independent contractors, so Staff was unable to determine what licensure each driver carried. If the contractors are licensed by the Department of Licensing as limousine companies, there would be some safety standards in place—though they fall short of Commission rules for auto transportation companies. In the worst-case scenario, the independent contractors are not licensed at all, and have no safety oversight. In either case, there is currently no Commission oversight of these drivers and vehicles. This raises the potential for an undocumented driver medical or qualification issue, excessive driver hours of service, fatigue, or an undocumented vehicle defect—all of which place the public at risk.

Factor 2 - Whether the violation is intentional.

Considerations include:

- Whether the company ignored Commission staff's (Staff) previous technical assistance; and
- Whether there is clear evidence through documentation or other means that shows the company knew of and failed to correct the violation.

Staff believes Shuttle Express is well aware of the rules surrounding independent contractors, and that it knowingly violated those rules—now for the third time.

Staff began providing technical assistance to Shuttle Express with regard to independent contractors beginning in 2004. Shuttle Express was advised that use of independent contractors to provide auto transportation services was a violation of Commission rules.

Since 2008, the company has been penalized twice for providing auto transportation services using independent contractors. In addition, the company has applied for, and received, two waivers from Commission rules which allowed the company to use independent contractors on a

limited basis. The waiver applications provide further evidence that Shuttle Express knows the rules. This latest round of violations suggests a blatant and intentional disregard of the rules by the company.

Factor 3 - Whether the company self-reported the violation.

Shuttle Express did not report any of these violations.

Factor 4 - Whether the company was cooperative and responsive.

Shuttle Express responded to Staff's data requests and allowed Staff to perform a site visit during which Wes Marks and Paul Kajanoff provided helpful information. The company balked, however, at providing the names of its independent contractors and a copy of the contract between the company and its independent contractors.

Factor 5 - Whether the company promptly corrected the violations and remedied the impacts.

Shuttle Express "corrected its violations and remedied the impacts" by obtaining another temporary waiver (effective September 30, 2016). This latest temporary waiver allowed the company to provide auto transportation services using independent contractors for 10 months.

Factor 6 - The number of violations.

Staff found that non-employed drivers completed 35,351 trips using non-owned vehicles during the two-year limitations period. Staff believes this is a significant number of violations over a 22-month period—an average of 1,606 per month.

Factor 7 - The number of customers affected.

Again, independent contractors completed 35,351 trips. We find it likely that many of the trips included multiple passengers which would increase the number of customers affected.

Factor 8 - The likelihood of recurrence.

Shuttle Express seems committed to using independent contractors. It appears the company prefers to take its chances with penalties, or to obtain temporary waivers, rather than ceasing its independent contractor program or seeking legislative action to change the law. Staff believes the likelihood of recurrence is high, unless significant penalties are assessed in this case.

Factor 9 - The company's past performance regarding compliance, violations, and penalties.

Staff reviewed Shuttle Express's penalty and compliance history for the past ten years. With three exceptions noted below, the company has demonstrated compliance with Commission rules and regulations with respect to annual reports and regulatory fees, regulatory filings, and safety compliance reviews.

- In July 2008, in Docket TC-072228, the Commission penalized Shuttle Express \$9,500 for 95 violations of WAC 480-30-213(2), using independent contractor drivers.

- In May 2013, in Docket TC-120323, the Commission penalized Shuttle Express \$60,000 for 5,715 violations of WAC 480-30-213(2), using independent contractor drivers.
- In August 2016, in Docket TC-160991, the Commission penalized Shuttle Express \$400 for violations of WAC 480-30-221, Vehicle and Driver Safety Requirements.

Factor 10 - The company's existing compliance program.

Shuttle Express complies with Commission rules, with the notable exception of those rules that the company has violated in order to continue to use independent contractor drivers.

Factor 11 - The size of the company.

Shuttle Express is the largest auto transportation company regulated by the Commission. In its 2016 annual report, the company reported 4.9 million miles traveled and \$9.3 million in gross intrastate operating revenues. Shuttle Express employs 150 drivers and operates 104 vehicles.

Penalty recommendation

In docket TC-072228, the commission penalized Shuttle Express \$100 per violation for 95 violations (\$9,500). In the most recent case, docket TC-120323, the commission penalized the company approximately \$10 per violation for 5,715 violations and a penalty of \$60,000.

Based on all the factors above, and considering this is the third time Shuttle Express has committed violations of WAC 480-30-213, staff recommend the commission penalize Shuttle Express approximately triple the amount per violation of the previous case for a total of \$1,060,530. (35,351 violations x \$30 ea.)

RCW 80.01.040 (2007)
RCW 81.04.070 (2013)
RCW 81.04.110 (1994)
RCW 81.04.380 (1961)
RCW 81.04.510 (2013)
RCW 81.68.010 (2007)
RCW 81.68.020 (2007)
RCW 81.68.030 (2007)
RCW 81.68.040 (2007)
WAC 480-07-400 (2006)
WAC 480-30-036 (2016)
WAC 480-30-086 (2016)
WAC 480-30-213 (2006)

RCW 80.01.040 General powers and duties of commission.

The utilities and transportation commission shall:

(1) Exercise all the powers and perform all the duties prescribed by this title and by Title 81 RCW, or by any other law.

(2) Regulate in the public interest, as provided by the public service laws, all persons engaging in the transportation of persons or property within this state for compensation.

(3) Regulate in the public interest, as provided by the public service laws, the rates, services, facilities, and practices of all persons engaging within this state in the business of supplying any utility service or commodity to the public for compensation.

(4) Make rules and regulations necessary to carry out its other powers and duties.

[2007 c 234 § 1; 1985 c 450 § 10; 1961 c 14 § 80.01.040. Prior: (i) 1949 c 117 § 3; Rem. Supp. 1949 § 10964-115-3. (ii) 1945 c 267 § 5; Rem. Supp. 1945 § 10459-5. (iii) 1945 c 267 § 6; Rem. Supp. 1945 § 10459-6. Formerly RCW 43.53.050.]

RCW 81.04.070 Inspection of books, papers, and documents.

The commission and each commissioner, or any person employed by the commission, shall have the right, at any and all times, to inspect the accounts, books, papers, and documents of any public service company, and the commission, or any commissioner, may examine under oath any officer, agent, or employee of such public service company in relation thereto, and with reference to the affairs of such company: PROVIDED, That any person other than a commissioner who shall make any such demand shall produce his or her authority from the commission to make such inspection.

[2013 c 23 § 287; 1961 c 14 § 81.04.070. Prior: 1911 c 117 § 77; RRS § 10415.]

RCW 81.04.110 Complaint — Hearing.

Complaint may be made by the commission of its own motion or by any person or corporation, chamber of commerce, board of trade, or any commercial, mercantile, agricultural or manufacturing society, or any body politic or municipal corporation, by petition or complaint in writing, setting forth any act or thing done or omitted to be done by any public service company or any person, persons, or entity acting as a public service company in violation, or claimed to be in violation, of any provision of law or of any order or rule of the commission.

When two or more public service companies or a person, persons, or entity acting as a public service company, (meaning to exclude municipal and other public corporations) are engaged in competition in any locality or localities in the state, either may make complaint against the other or others that the rates, charges, rules, regulations or practices of such other or others with or in respect to which the complainant is in competition, are unreasonable, unremunerative, discriminatory, illegal, unfair or intending or tending to oppress the complainant, to stifle competition, or to create or encourage the creation of monopoly, and upon such complaint or upon complaint of the commission upon its own motion, the commission shall have power, after notice and hearing as in other cases, to, by its order, subject to appeal as in other cases, correct the abuse complained of by establishing such uniform rates, charges, rules, regulations or practices in lieu of those complained of, to be observed by all of such competing public service companies in the locality or localities specified as shall be found reasonable, remunerative, nondiscriminatory, legal, and fair or tending to prevent oppression or monopoly or to encourage competition, and upon any such hearing it shall be proper for the commission to take into consideration the rates, charges, rules, regulations and practices of the public service company or companies complained of in any other locality or localities in the state.

All matters upon which complaint may be founded may be joined in one hearing, and no motion shall be entertained against a complaint for misjoinder of complaints or grievances or misjoinder of parties; and in any review of the courts of orders of the commission the same rule shall apply and pertain with regard to the joinder of complaints and parties as herein provided: PROVIDED, All grievances to be inquired into shall be plainly set forth in the complaint. No complaint shall be dismissed because of the absence of direct damage to the complainant.

Upon the filing of a complaint, the commission shall cause a copy thereof to be served upon the person or company complained of, which shall be accompanied by a notice fixing the time when and place where a hearing will be had upon such complaint. The time fixed for such hearing shall not be less than ten days after the date of the service of such notice and complaint, excepting as herein provided. Rules of practice and procedure not otherwise provided for in this title may be prescribed by the commission.

[1994 c 37 § 2; 1961 c 14 § 81.04.110. Prior: 1913 c 145 § 1; 1911 c 117 § 80; RRS § 10422.]

RCW 81.04.380 Penalties — Violations by public service companies.

Every public service company, and all officers, agents and employees of any public service company, shall obey, observe and comply with every order, rule, direction or requirement made by the commission under authority of this title, so long as the same shall be and remain in force. Any public service company which shall violate or fail to comply with any provision of this title, or which fails, omits or neglects to obey, observe or comply with any order, rule, or any direction, demand or requirement of the commission, shall be subject to a penalty of not to exceed the sum of one thousand dollars for each and every offense. Every violation of any such order, direction or requirement of this title shall be a separate and distinct offense, and in case of a continuing violation every day's continuance thereof shall be and be deemed to be a separate and distinct offense.

[1961 c 14 § 81.04.380. Prior: 1911 c 117 § 94; RRS § 10443.]

RCW 81.04.510

Engaging in business or operating without approval or authority—Procedure.

Whether or not any person or corporation is conducting business requiring operating authority, or has performed or is performing any act requiring approval of the commission without securing such approval, shall be a question of fact to be determined by the commission. Whenever the commission believes that any person or corporation is engaged in operations without the necessary approval or authority required by any provision of this title, it may institute a special proceeding requiring such person or corporation to appear before the commission at a location convenient for witnesses and the production of evidence and bring with him or her or it books, records, accounts, and other memoranda, and give testimony under oath as to his or her or its operations or acts, and the burden shall rest upon such person or corporation of proving that his or her or its operations or acts are not subject to the provisions of this chapter. The commission may consider any and all facts that may indicate the true nature and extent of the operations or acts and may subpoena such witnesses and documents as it deems necessary.

After having made the investigation herein described, the commission is authorized and directed to issue the necessary order or orders declaring the operations or acts to be subject to, or not subject to, the provisions of this title. In the event the operations or acts are found to be subject to the provisions of this title, the commission is authorized and directed to issue cease and desist orders to all parties involved in the operations or acts.

In proceedings under this section, no person or corporation shall be excused from testifying or from producing any book, waybill, document, paper, or account before the commission when ordered to do so, on the ground that the testimony or evidence, book, waybill, document, paper, or account required of him or her or it may tend to incriminate him or her or it or subject him or her or it to penalty or forfeiture; but no person or corporation shall be prosecuted, punished, or subjected to any penalty or forfeiture for or on account of any account, transaction, matter, or thing concerning which he or she or it shall under oath have testified or produced documentary evidence in proceedings under this section: PROVIDED, That no person so testifying shall be exempt from prosecution or punishment for any perjury committed by him or her in his or her testimony.

RCW 81.68.010 Definitions.

The definitions set forth in this section apply throughout this chapter, unless the context clearly indicates otherwise.

(1) "Corporation" means a corporation, company, association, or joint stock association.

(2) "Person" means an individual, firm, or a copartnership.

(3) "Auto transportation company" means every corporation or person, their lessees, trustees, receivers, or trustees appointed by any court whatsoever, owning, controlling, operating, or managing any motor-propelled vehicle used in the business of transporting persons and their baggage on the vehicles of auto transportation companies carrying passengers, for compensation over any public highway in this state between fixed termini or over a regular route, and not operating exclusively within the incorporated limits of any city or town.

(4) "Public highway" means every street, road, or highway in this state.

(5) The words "between fixed termini or over a regular route" mean the termini or route between or over which any auto transportation company usually or ordinarily operates any motor-propelled vehicle, even though there may be departure from the termini or route, whether the departures are periodic or irregular. Whether or not any motor-propelled vehicle is operated by any auto transportation company "between fixed termini or over a regular route" within the meaning of this section is a question of fact, and the finding of the commission thereon is final and is not subject to review.

[2007 c 234 § 46; 1989 c 163 § 1; 1984 c 166 § 1; 1979 c 111 § 16; 1975-'76 2nd ex.s. c 121 § 1; 1969 ex.s. c 210 § 10; 1961 c 14 § 81.68.010. Prior: 1935 c 120 § 1; 1921 c 111 § 1; RRS § 6387.]

RCW 81.68.020 Compliance with chapter required.

A corporation or person, their lessees, trustees, or receivers or trustees appointed by any court whatsoever, may not engage in the business of operating as a common carrier any motor-propelled vehicle for the transportation of persons and their baggage on the vehicles of auto transportation companies carrying passengers, between fixed termini or over a regular route for compensation on any public highway in this state, except in accordance with this chapter.

[2007 c 234 § 48; 1989 c 163 § 3; 1984 c 166 § 3; 1961 c 14 § 81.68.020. Prior: 1927 c 166 § 1; 1921 c 111 § 2; RRS § 6388.]

RCW 81.68.030 Regulation by commission.

The commission is vested with power and authority, and it is its duty to supervise and regulate every auto transportation company in this state as provided in this section. Under this authority, it shall for each auto transportation company:

- (1) Fix, alter, and amend just, fair, reasonable, and sufficient rates, fares, charges, classifications, rules, and regulations;
- (2) Regulate the accounts, service, and safety of operations;
- (3) Require the filing of annual and other reports and of other data;

(4) Supervise and regulate the companies in all other matters affecting the relationship between such companies and the traveling and shipping public;

(5) By general order or otherwise, prescribe rules and regulations in conformity with this chapter, applicable to any and all such companies, and within such limits make orders.

The commission may, at any time, by its order duly entered after notice to the holder of any certificate under this chapter, and an opportunity for a hearing, at which it shall be proven that the holder willfully violates or refuses to observe any of the commission's proper orders, rules, or regulations, suspend, revoke, alter, or amend any certificate issued under the provisions of this chapter, but the holder of the certificate has all the rights of rehearing, review, and appeal as to the order of the commission as is provided for in chapter 34.05 RCW.

[2007 c 234 § 96; 2005 c 121 § 2; 1989 c 163 § 4; 1984 c 166 § 4; 1961 c 14 § 81.68.030. Prior: 1921 c 111 § 3; RRS § 6389.]

RCW 81.68.040 Certificate of convenience and necessity.

An auto transportation company shall not operate for the transportation of persons and their baggage for compensation between fixed termini or over a regular route in this state, without first having obtained from the commission under this chapter a certificate declaring that public convenience and necessity require such operation. Any right, privilege, certificate held, owned, or obtained by an auto transportation company may be sold, assigned, leased, transferred, or inherited as other property, only if authorized by the commission. The commission may, after notice and an opportunity for a hearing, when the applicant requests a certificate to operate in a territory already served by a certificate holder under this chapter, only when the existing auto transportation company or companies serving such territory will not provide the same to the satisfaction of the commission, or when the existing auto transportation company does not object, and in all other cases with or without hearing, issue the certificate as prayed for; or for good cause shown, may refuse to issue same, or issue it for the partial exercise only of the privilege sought, and may attach to the exercise of the rights granted by the certificate to such terms and conditions as, in its judgment, the public convenience and necessity may require.

[2007 c 234 § 49; 2005 c 121 § 3; 1961 c 14 § 81.68.040. Prior: 1921 c 111 § 4; RRS § 6390.]

WAC 480-07-400 Discovery.

(1) **General.**

(a) *No limitation on commission authority to audit and inspect.* Nothing in this section imposes any limitation on the commission's ability to audit or obtain the books and records of public service companies, or the public service companies' obligation to provide information to the commission, whether or not in the context of an adjudicative proceeding.

(b) *Informal discovery procedures.* Parties in an adjudicative proceeding may agree to informal discovery procedures in addition to, or in place of, the procedures contained in this section.

(c) **Definitions.** For purposes of WAC 480-07-400 through 480-07-425, the following terms have the following meanings:

(i) *Party.* Any party as defined by WAC 480-07-340.

(ii) *Data.* As used in this section, "data" means information of any type, in any form.

(iii) *Data request.* A party's written request that calls for another party to produce data in connection with an adjudicative proceeding is a "data request." Generally, data requests seek documents, an analysis, compilation or summary of documents into a requested format, a narrative response explaining a policy, position, or a document, or the admission of a fact asserted by the requesting party. If a party relies on a cost study, it is expected that the party will, on request, rerun the study based on different assumptions, subject to the standards in subsection (5) of this section. The commission will not order a party to respond to a data request that seeks production of a new cost study unless there is a compelling need for such production.

(iv) *Record requisition.* A request for data made on the record during a conference or hearing session or during a deposition is a "record requisition."

(v) *Bench request.* A request for data made by or on behalf of the presiding officer is a "bench request."

(vi) *Depositions.* Depositions are described in WAC 480-07-410.

(2) **When discovery available.**

(a) **Subpoenas always available.** Subpoenas are available as a means of discovery as provided in Title 80 or 81 RCW and chapter 34.05 RCW.

(b) **When other discovery methods available.** If the commission finds that an adjudicative proceeding meets one of the following criteria, the methods of discovery described in subsections (1)(c)(iii) through (vi) of this section and in WAC 480-07-410 and 480-07-415 will be available to parties:

(i) Any proceeding involving a change in the rate levels of an electric company, natural gas company, pipeline company, telecommunications company, water company, solid waste company, low-level radioactive waste disposal site, or a segment of the transportation industry;

(ii) Any proceeding that the commission declares to be of a potentially precedential nature;

(iii) Any complaint proceeding involving claims of discriminatory or anticompetitive conduct, unjust or unreasonable rates, violations of provisions in Titles 80 and 81 RCW; or

(iv) Any proceeding in which the commission, in its discretion, determines that the needs of the case require the methods of discovery specified in this rule.

(3) **Frequency, extent, and scope of discovery.** Data requests must seek only information that is relevant to the issues in the adjudicative proceeding or that may lead to the production of information that is relevant. A party may not object to a data request on grounds that the information sought will be inadmissible at the hearing, if the information sought appears reasonably calculated to lead to discovery of admissible evidence. Parties must not seek discovery that is unreasonably cumulative or duplicative, or is obtainable from some other source that is more convenient, less burdensome, or less expensive. A discovery request is inappropriate when the party seeking discovery has had ample opportunity to obtain the information sought or the discovery is unduly burdensome or expensive, taking into account the needs of the adjudicative proceeding,

limitations on the parties' resources, scope of the responding party's interest in the proceeding, and the importance of the issues at stake in the adjudicative proceeding. Discovery through data requests or otherwise must not be used for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the costs of litigation. The commission may impose sanctions for abusive discovery practice.

(4) **Schedule.** The commission may establish and set forth in a prehearing order a schedule for discovery. Any such schedule will provide deadlines sufficient to allow a timely opportunity for responses and for disputes to be resolved. The presiding officer may impose or modify time limits to the extent necessary to conform to the commission's hearing schedule.

[Statutory Authority: RCW 80.01.040 and 80.04.160. WSR 06-16-053 (Docket A-050802, General Order R-536), § 480-07-400, filed 7/27/06, effective 8/27/06; WSR 03-24-028 (General Order R-510, Docket No. A-010648), § 480-07-400, filed 11/24/03, effective 1/1/04.]

WAC 480-30-036 Definitions, general.

(1) See WAC 480-30-261 for definition of terms used primarily in tariffs and time schedules and WAC 480-30-216 for definitions used in driver and vehicle safety rules.

(2) Unless the language or context indicates that a different meaning is intended, the following definitions apply:

"**Agent**" means a person authorized to transact business for, and in the name of, another.

"**Airporter service**" means an auto transportation service that starts or ends at a station served by another type of transportation such as, air or rail transportation. Airporter service is often a premium service that involves handling luggage. Although stops may be made along the way, they are usually limited to picking up or discharging passengers, luggage, and/or express freight bound to or from the airport or depot served.

"**Alternate arrangements for passengers**" means the travel arrangements made by an auto transportation company that has accepted a trip booking or reservation from a passenger and that is unable to provide the agreed transportation. The alternate arrangements may require travel by another carrier or mode of transportation at no additional cost to the passenger beyond what the passenger would have paid for the original transportation arrangement.

"**Application docket**" means a commission publication providing notice of all applications requesting auto transportation operating authority, with a description of the authority requested. The commission sends this publication to all persons currently holding auto transportation authority, to all persons with pending applications for auto transportation authority, to affected local jurisdictions or agencies, and to all other persons who asked to receive copies of the application docket.

"**Area**" means a defined geographical location. Examples include, but are not limited to:

- (a) A specified city or town;
- (b) A specified county, group of counties, or subdivision of the state, e.g., western Washington;
- (c) A zone, e.g., company designated territory; or

(d) A route, e.g., area within four road miles of Interstate 5.

"Auto transportation company" means every person owning, controlling, operating, or managing any motor-propelled vehicle not usually operated on or over rails, used in the business of transporting persons over any public highway in this state between fixed termini or over a regular route, and not operating exclusively within the incorporated limits of any city or town.

"Between fixed termini or over a regular route" means the fixed points between which an auto transportation company provides service or the route over which an auto transportation company ordinarily operates any motor-propelled vehicle, even though there may be variance whether the variance is periodic or irregular.

"Bus" means a motor vehicle designed, constructed, and/or used for the transportation of passengers.

"Business days" means days of the week excluding Saturdays, Sundays, and official state holidays.

"By-reservation-only service" means transportation of passengers by an auto transportation company, with routes operated only if passengers have made prior reservations.

"Certificate" means:

(a) The certificate of public convenience and necessity issued by the Washington utilities and transportation commission under the provisions of chapter 81.68 RCW to operate as an auto transportation company; or

(b) The certificate issued by the Washington utilities and transportation commission under chapter 81.70 RCW to operate as a charter and excursion carrier in the state of Washington.

"Certificated authority" means:

(a) The territory and services granted by the commission and described in an auto transportation company's certificate of public convenience and necessity; or

(b) Operations in the state of Washington for charter and excursion service carriers.

"Charter party carrier" or **"charter carrier"** means every person engaged in the transportation of a group of persons who, pursuant to a common purpose and under a single contract, have acquired the use of a motor bus to travel together as a group to a specified destination or for a particular itinerary, either agreed upon in advance or modified by the chartering group after having left the place of origin, or who is engaged in the transportation of persons by party bus over any public highway in this state.

"Claim" means a demand made on a company for payment resulting from a loss sustained through the company's negligence or for inadequate service provided by the company.

"Closed-door service" means a portion of a route or territory in which an auto transportation company is not allowed to pick up or deliver passengers. Closed-door service restrictions must be clearly stated in an auto transportation company's certificate.

"Common purpose" means that a group of persons is traveling together to achieve a common goal or objective. For example, a group of persons traveling together to attend a common function or to visit a common location. For the purposes of these rules it does not mean a group of persons who have no common goal other than transportation to, or from, the airport.

"Commission" means the Washington utilities and transportation commission.

"Common carrier" means any person who transports passengers by motor vehicle over the public highways for compensation.

"Company" means an entity authorized by the commission to transport passengers, for compensation, using a motor vehicle, over the public highways of the state.

"Complaint" means one of two types of actions by a person against a passenger transportation company that the commission regulates:

(a) **"Informal complaints"** are those complaints filed with the commission under the provisions of WAC 480-07-910. Informal complaints are normally investigated and resolved by commission staff.

(b) **"Formal complaints"** are those complaints filed with the commission under the provisions of WAC 480-07-370. In a formal complaint, the burden of proof resides with the complaining party who must prove its assertions in a formal commission proceeding.

"Connecting service" means an auto transportation company service over a route, or routes, that require passengers to transfer from one vehicle to another vehicle operated by either the same company or a different company before reaching the ending point.

"Contract carrier" means a person holding a certificate issued by the commission authorizing transportation of passengers under special and individual contracts or agreements.

"Customer" means a person who purchased transportation services from an auto transportation company or a person, corporation, or other entity that prearranges for transportation services with a charter party carrier or purchases a ticket for transportation services aboard an excursion service carrier.

"Direct route" means an auto transportation company service over a route that goes from the beginning point to the ending point with limited, if any, stops along the way, and traveling only to points located on the specific route without requiring a passenger to transfer from one vehicle to another.

"Discontinuance of service":

(a) **"Permanent discontinuance of service"** means that a company holding auto transportation authority issued by the commission is unable to continue to provide all, or part of, the service authorized by the company's certificate, filed tariff, or filed time schedule and requests commission permission to permanently discontinue all, or part of, its service and relinquish that certificate or portion of that certificate. See WAC 480-30-186.

(b) **"Temporary discontinuance of service"** means that a company holding auto transportation authority issued by the commission is unable to continue to provide all, or part of, the service authorized by the company's certificate, filed tariff, or filed time schedule and requests commission permission to discontinue all, or part of, its service for a specified, limited period of time.

"Door-to-door service" means an auto transportation company service provided between a location identified by the passenger and a point specifically named by the company in its filed tariff and time schedule.

"Double-decker bus" means a motor vehicle with more than one passenger deck.

"Excursion service carrier" or **"excursion carrier"** means every person engaged in the transportation of persons for compensation over any public highway in the state from points of origin within any city, town, or area, to any other location within the state of Washington and returning to that origin. The service will not pick up or drop off

passengers after leaving and before returning to the area of origin. The excursions may or may not be regularly scheduled. Compensation for the transportation offered must be computed, charged, or assessed by the excursion service company on an individual fare basis.

"Express freight/package service" means transportation of freight and packages, other than packages or baggage carried or checked by passengers, offered by a passenger transportation company.

"Express passenger service" means auto transportation company service provided between fixed points or stations with few, if any, stops along the route, and is designed to get passengers from origin to destination more quickly than normally scheduled passenger service.

"Federal Motor Carrier Safety Administration" means an agency of the United States Department of Transportation (USDOT) and successor agency to the former Interstate Commerce Commission.

"Filing" means any application, petition, tariff proposal, annual report, comment, complaint, pleading, or other document submitted to the commission.

"Fixed termini" means points of origin and destination that are set, static locations or defined geographic areas. Examples include a city or town, a building or an airport. In addition "fixed termini" can include service between an airport and unlimited points within a defined geographic area.

"Flag stops" means a point along an auto transportation company's normally traveled routes where the company stops only if it receives notification that a passenger wishes to board the vehicle at that point. An auto transportation company must list available flag stops in the company's tariffs and time schedules. Flag stops may only be named at points that provide waiting passengers safe access to the vehicle.

"Group" means:

- (a) Two or more passengers traveling together;
- (b) A class of passengers to whom special rates and/or rules apply. For example, active military personnel.

"Intermediate point" means a point located on a route between two other points that are specifically named in an auto transportation company's certificate or tariff.

"Intermediate service" means service to an intermediate point.

"Interruption in service" means a period of time during which an auto transportation company cannot provide service listed in its certificate, its filed tariff, or its filed time schedule. An interruption in service is normally short lived, lasting no more than a few hours or a few days.

"Leasing":

(a) **"Leasing authority"** means one auto transportation company allowing another person to operate all, or a portion, of the authority granted to the first company by the commission. A joint application to, and approval from, the commission is required to lease authority. See WAC 480-30-141.

(b) **"Leasing equipment"** means the act of a passenger transportation company to supplement its fleet by acquiring a vehicle(s) from a third party for a specified period of time under contract. See WAC 480-30-236.

"Liquor permit holder" means a holder of an appropriate special permit to provide liquor issued under chapter 66.20 RCW, who is twenty-one years of age or older and who

is responsible for compliance with the requirements of WAC 480-30-244 and chapter 66.20 RCW during the provision of transportation services.

"Motor vehicle" or **"vehicle"** means:

(a) As related to auto transportation companies: Every self-propelled vehicle used on the public highways, for the transportation of persons for compensation.

(b) As related to charter and excursion carriers: Every self-propelled vehicle with a manufacturer's seating capacity for eight or more passengers, including the driver, used on the public highways, for the transportation of persons for compensation.

"Named points" means cities, towns, or specific locations that are listed in an auto transportation company's certificate, tariff, or time schedule.

"Nonstop service" means transportation of passengers from point of origin to point of destination without stopping at any intermediate points.

"On-call service" means unscheduled auto transportation company service provided only to those passengers that have by prior arrangement requested service prior to boarding.

"Party bus" means any motor vehicle whose interior enables passengers to stand and circulate throughout the vehicle because seating is placed around the perimeter of the bus or is nonexistent and in which food, beverages, or entertainment may be provided. A motor vehicle configured in the traditional manner of forward-facing seating with a center aisle is not a party bus.

"Passenger facility" means a location at which an auto transportation company stations employees and at which passengers can purchase tickets or pay fares for transportation service.

"Passenger transportation company" means an auto transportation company or charter and excursion carrier.

"Person" means an individual, firm, corporation, association, partnership, lessee, receiver, trustee, consortium, joint venture, or commercial entity.

"Premium service" means a type of service provided by an auto transportation company that is outside normal service. Examples include express service, direct route service, and nonstop door-to-door service.

"Private carrier" means a person who transports passengers in the person's own vehicle purely as an incidental adjunct to some other established private business owned or operated by that person in good faith.

"Private motor vehicle" means a vehicle owned or operated by a private carrier.

"Public highway" means every street, road, or highway in this state.

"Public transit agency" means a municipal corporation or agency of state or local government formed under the laws of the state of Washington for the purpose of providing transportation services including, but not limited to, public transportation benefit areas, regional transit authorities, municipal transit authorities, city and county transit agencies.

"Residence" means the regular dwelling place of an individual or individuals.

"Route" means a highway or combination of highways over which an auto transportation company provides passenger service. There are two types of routes:

(a) **"Irregular route"** means travel between points named in an auto transportation company's certificate via any highway or combination of highways the company wishes

to operate over. The certificate issued to the company does not list highways to be used, but the company defines routes in its tariffs and time schedules.

(b) **"Regular route"** means an auto transportation company providing passenger transportation over a route named in the certificate issued to the company by the commission.

"Scheduled service" means an auto transportation company providing passenger service at specified arrival and/or departure times at points on a route.

"Single contract" means an agreement between a charter carrier and a group of passengers to provide transportation services at a set price for the group or trip. Under a single contract, passengers are not charged individually.

"Small business" means any company that has fifty or fewer employees.

"Special or promotional fares" means temporary fares for specific services offered for no more than ninety days.

"State" means the state of Washington.

"Subcontracting - Auto transportation company" means that an auto transportation company holding authority from the commission contracts with a second auto transportation company to provide service that the original company has agreed to provide, but finds it is unable to provide. See WAC 480-30-166.

"Subcontracting - Charter and excursion carrier" means that a charter and excursion carrier holding authority from the commission contracts with a second charter and excursion carrier to provide service that the original carrier has agreed to provide, but finds it is unable to provide.

"Substitute vehicle" means a vehicle used to replace a disabled vehicle for less than thirty days.

"Suspension" means an act by the commission to temporarily revoke a company's certificated authority; or an act by the commission to withhold approval of an auto transportation company's tariff filing.

"Tariff" or **"tariff schedule"** means a document issued by an auto transportation company containing the services provided, the rates the company must assess its customers for those services, and the rules describing how the rates apply.

"Tariff service territory" means a company-defined geographic area of its certificated authority in which a specific tariff applies.

"Temporary certificate" means the certificate issued by the Washington utilities and transportation commission under RCW 81.68.046 to operate as an auto transportation company for up to one hundred eighty days or pending a decision on a parallel filed auto transportation company certificate application.

"Temporary certificate authority" means the territory and services granted by the commission and described in an auto transportation company's temporary certificate.

"Ticket agent agreements" means a signed agreement between an auto transportation company and a second party in which the second party agrees, for compensation, to sell tickets to passengers on behalf of the auto transportation company. See WAC 480-30-391.

"Time schedule" means a document filed as part of an auto transportation company's tariff, or as a separate document, that lists the routes operated by the company including the times and locations at which passengers may receive service and any rules specific to operating those routes.

[Statutory Authority: RCW 80.01.040, 80.04.160, 80.54.020, and 80.54.060. WSR 16-02-076 (Docket TE-151080, General Order R-583), § 480-30-036, filed 1/4/16, effective 2/4/16. Statutory Authority: RCW 80.01.040, 81.04.160, 81.12.050, 81.68.030, and 81.70.270. WSR 06-13-006 (General Order No. R-533, Docket No. TC-020497), § 480-30-036, filed 6/8/06, effective 7/9/06.]

WAC 480-30-086 Certificates, general.

- (1) **Certificate required.** A person must have a certificate from the commission before operating as a passenger transportation company in the state of Washington.
- (2) **Company name.** The company name is the name of the certificate holder.
 - (a) A company electing to conduct operations under a trade name must first register the trade name with the commission.
 - (b) A company must conduct all operations under the company name, a registered trade name, or both. Operations includes, but is not limited to, advertising, ticketing, and identifying vehicles.
 - (c) A company may not operate under a company name or trade name that is similar to that of another company if use of the similar name misleads the public or results in unfair or destructive competitive practices.
- (3) **Display.** A company must keep its original certificate on file at its principal place of business open to inspection by any customer, law enforcement officer, or authorized commission representative who asks to see it.
- (4) **Replacement.** The commission will replace a lost or destroyed original certificate at no charge.
- (5) **Description of certificated authority.** When a company's certificate authority includes boundaries such as cities, towns, streets, avenues, roads, highways, townships, ranges or other descriptions, the boundaries remain established as they existed at the time the commission granted the authority.
- (6) **Operating within certificated authority.**
 - (a) A company must operate strictly within the authority described in its certificate.
 - (b) The commission may take administrative action against a company operating outside its certificated authority. Refer to WAC 480-30-241 for information regarding the commission's compliance policy.

[Statutory Authority: RCW 80.01.040, 80.04.160, 80.54.020, and 80.54.060. WSR 16-02-076 (Docket TE-151080, General Order R-583), § 480-30-086, filed 1/4/16, effective 2/4/16. Statutory Authority: RCW 80.01.040, 81.04.160, 81.12.050, 81.68.030, and 81.70.270. WSR 06-13-006 (General Order No. R-533, Docket No. TC-020497), § 480-30-086, filed 6/8/06, effective 7/9/06.]

WAC 480-30-213 Vehicles and drivers.

- (1) The vehicles operated by a passenger transportation company must be owned by or leased to the certificate holder.
- (2) The driver of a vehicle operated by a passenger transportation company must be the certificate holder or an employee of the certificate holder.

[Statutory Authority: RCW 80.01.040, 81.04.160, 81.12.050, 81.68.030, and 81.70.270. WSR 06-13-006 (General Order No. R-533, Docket No. TC-020497), § 480-30-213, filed 6/8/06, effective 7/9/06.]

AUTO TRANSPORTATION COMPANIES
Approved to Operate Under Flexible Fares
CHARTER & EXCURSION CARRIERS
2015
ANNUAL REPORT

FOR

Shuttle Express Incorporated
(NAME UNDER WHICH CORPORATION, PARTNERSHIP, OR INDIVIDUAL IS DOING BUSINESS)

800 S.W 16th St.
(OFFICIAL MAILING ADDRESS)

Renton
(CITY)

WA
(STATE)

98057
(ZIP)

Please check if address listed above is an updated address

Report Year Ended: December 31, 2015

ENTERED IN COMPUT
SB APR 28 2016

Inquiries concerning this Annual Report should be addressed to:

Name/Title: Paul Kajanoff / President
Address: 800 SW 16th St.
City: Renton
State/Zip: Washington / 98057
Telephone: 425-981-7063
Email: pkajanoff@shuttleexpress.net

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WASHINGTON



UTILITIES AND TRANSPORTATION
COMMISSION

REPORT MUST BE RECEIVED NO LATER THAN MAY 2, 2016

Please refer to the Instructions for Completing the Annual Report on Page 2

INSTRUCTIONS FOR ANNUAL REPORT COMPLETION***Commission Authority***

The purpose of this form is to collect financial and operational information from auto transportation and charter companies regulated by the Washington Utilities and Transportation Commission (UTC). The commission's authority for requiring this report is found in RCW 81.04.080. This report is a non-confidential public use form.

Certification

The Annual Report Certification must be signed by an authorized officer, partner or owner.

Regulatory Fees

Regulatory fees are set by commission order A-140166.

Deadlines and Penalties

All auto transportation and charter companies regulated by the UTC are required to complete this form, including all schedules. Failure to complete all schedules will result in the report being considered incomplete and subject to penalties. Completed forms and regulatory fee payments must be received by the UTC no later than **May 2, 2016**. Failure to file the annual report by the above deadline will result in a financial penalty of \$100 for each business day after May 2. Failure to pay the regulatory fees by the above deadline will result in a 2 percent penalty on the amount due and a 1 percent monthly interest charge on the unpaid balance.

Extension Requests

You may file a written request for an extension to file the completed annual report; however, the commission will not extend the deadline for paying regulatory fees. Any extension request must be filed with the commission by **April 15, 2016**, and must state a valid reason for why the extension is needed and identify a specific date which the report will be filed with the commission. The commission will notify you by April 30 whether your request is approved or denied. Even if your request is approved, you will still be liable for penalties and interest payments if you fail to pay your regulatory fees by May 2. To file your extension request online visit:

<http://www.utc.wa.gov/docs/Pages/ElectronicFiling.aspx>

No longer operating in Washington

You may cancel your registration or permit by using the Voluntary Cancellation Form available at:

<http://www.utc.wa.gov/regulatedIndustries/transportation/charterBuses/Pages/default.aspx>

However, if your company operated in Washington at any time during the 2015 calendar year, you must pay regulatory fees and file a closing annual report based on the months of operation during 2015.

Confidential Status

Auto transportation and charter/excursion companies are not permitted to file annual report documents as confidential. If a company regulated under RCW Title 81 submits its annual report or fee sheet as confidential, the commission will reject that submission and will not consider the report to be filed until the date the company submits the report and all required documents and information without any designation of confidentiality. If that date is after May 1, the company will be subject to the penalties described above. The commission will not disclose credit card information, if included, on the Payment Information Page or via online filing.

Electronic Filing and Payment

To obtain an electronic format of the report, submit a report online or pay your regulatory fees online visit:

www.utc.wa.gov/regulatedindustries/pages/annualreports

Staff Contact

Kim Anderson at (360) 664-1153 or kanderso@utc.wa.gov

TTY Toll-Free phone number 1-800-416-5289

ANNUAL REPORT CERTIFICATION

(PLEASE VERIFY THAT ALL SCHEDULES ARE ACCURATE AND COMPLETE BEFORE SIGNING)

I, the undersigned Paul Kajanoff
Responsible Account Officer (Please Print)
of Shuttle Express Incorporated
Name of Company

have examined the foregoing report; that, to the best of my knowledge and belief, all statement of fact contained in said report are true and said report is a correct statement of the business and affairs of the above-named respondent in respect to each and every matter set forth therein during the period from January 1, 2015, to December 31, 2015, inclusive.

President
Title
(please print)
425-981-7063
Telephone Number

[Signature]
Signature
(please type if filing electronically)
4/26/2016
Date

GENERAL INFORMATION

Washington Unified Business Identifier (UBI) No.: 600-030-043
(If you do not know your UBI No. please contact Business Licensing Service at 1-800-451-7985 or BLS@dor.wa.gov)

Business Structure (please check the appropriate designation):

- Individual / Sole Proprietor Partnership Other (LP, LLP, LLC) Corporation Nonprofit Corporation

List the name, title, and percentage of partner's share or stock distribution for major stockholders. If LLC, list members and percentage of ownership.

Name	Title	Percent / Shares / Stock / Ownership
JKS Trust	Trust	100%

SCHEDULE 1

(complete all information for the year 2015)

Staff Contact Information

Safety Director Name: Kore Greene Phone: 425-981-7051
Customer Service Contact Name: Kore Greene Phone: 425-981-7051

Recordable Intrastate and Interstate Accidents

Recordable Accidents	Intrastate		Interstate	
	Auto-Trans	Charter	Auto-Trans	Charter
A fatality	0	0	0	0
An injury to a person requiring immediate treatment away from the scene of the accident	1			
Disabling damage to a vehicle, requiring it to be towed from the accident scene	5			
Total Recordable Accidents	6	0	0	0

Vehicle and Mileage Information - Auto Transportation Authority Only

Driver and Vehicle Information		Mileage Information	
Commercial motor vehicle drivers employed	150	Total Operating Miles	
# of vehicles 16 passengers or less	79	Intrastate	4,905,088
# of vehicles 17 passengers or more	25	Interstate	0

Intrastate: Trips that operate exclusive within WA
Interstate: Trips that operate outside of WA

Mileage Information - Charter & Excursion Authority Only

Did you provide charter bus operations for any Washington School Districts during 2014?

Yes No

Mileage Information	
Total Operating Miles	
Intrastate	1,624,477
Interstate	5,000

Intrastate: Trips that operate exclusive within WA
Interstate: Trips that operate outside of WA

General Operations

Terminal Facilities - Auto Transportation Authority Only

List each terminal and location located in Washington state:

SCHEDULE 2

(this schedule is mandatory for Charter & Excursion carriers)

PASSENGER TRANSPORTATION VEHICLE LISTING

Year	Make	Model	State of Registration	License No.	VIN	Company Unit Number	Seating Capacity
				<i>See attached</i>			

Attach a separate list on additional pages if needed

**SCHEDULE 3
 REVENUES**

(this schedule is mandatory for Auto Transportation companies)

Gross intrastate revenue reported to the State Department of Revenue:

9,246,026

**SCHEDULE 4
 OPERATING STATISTICS**

OPERATIONS

(list individually for each regulated route operated and provide separate sheets if required)

<i>Not applicable if exclusively door-to-door by reservation</i>	Route 1	Route 2	Route 3	Route 4	Route 5
Number of terminals between stops		<i>See attached</i>			
Total number of trips annually for each route					
Total passengers carried annually per route					

<i>Door-to-door by reservation</i>	2015
Annual total number of trips	
Annual total passengers carried	

REGULATORY FEE CALCULATION SCHEDULE

Due May 1, 2015

Company Name:

Shuttle Express Inc 0

Annual Report Year
2015

In accordance with RCW 81.24.020 and 81.70.350 "Regulatory Fees", the Commission requires auto transportation companies and charter and excursion carriers to file reports of gross intrstate revenue and number of vehicles operated and pay fees on that revenue and sum of vehicles operated respectively. Every company subject to regulation shall file with the Commission a statement under oath and pay to the commission fees as instructed below.

Regulatory Fee Calculations - Auto Transportation Authority (Approved for Flexible Fares)

- 1 Total Gross Intrastate Operating Revenue (From Schedule 3) 9,246,026
- 2 If Line 1 is UNDER \$5000, enter ZERO (skip to Charter Regulatory Fee)
- 3 If Line 1 is OVER \$5000, enter amount from Line 1 x 0.4% 9,246,026 x 0.004 36,984 \$0.00
- 4 Auto Transportation Regulatory Fees owed (Line 2 or 3, whichever is applicable) 36,984

Agency Use Only 001-111-0268-230-01

Mileage Fees - Auto Transportation Authority (Approved for Flexible Fares)

Fees due WA Motor Vehicle Fund	Vehicle Miles			Fee Calculation (Intrastate Miles x Rate Per Mile)		Amount Owed
	Vehicle Propulsion	Total	Interstate Miles	Intrastate Miles	Rate Per Mile	
5 Gasoline		<u>667,829</u>	<u>0</u>	<u>667,829</u>	x 0.0015 =	<u>1,002</u> \$0.00
6 Other Fuel		<u>4,237,259</u>	<u>0</u>	<u>4,237,259</u>	x 0.0020 =	<u>8,475</u> \$0.00
7 Total Washington Motor Vehicle Fund Fees owed (Line 5 plus Line 6)						<u>9,477</u> \$0.00

Agency Use Only 001-108-0170-230-13

Penalty & Interest Calculations - Auto Transportation Authority (Approved for Flexible Fares)

- 8 Penalties on Regulatory Fees being paid after May 2
- 9 Enter amount from Line 4 x 2% x 0.02 \$0.00
- 10 Interest on Regulatory Fees being paid after May 31
- 11 Amount from Line 4 x Number of months past May 31 x 1% x x 0.01 \$0.00
- 12 Penalties on Vehicle Mileage Fees being paid after May 2
- 13 Enter amount from Line 7 (Per RCW 46.16.125) x 1.00 \$0.00
- 14 Total Penalties and Interest owed (all lines 9, 11 and 13) \$0.00

Agency Use Only 001-111-0268-230-11

Continue on Next Page

REGULATORY FEE CALCULATION SCHEDULED (CONT'D)

Company Name: Shuttle Express Inc 0 Annual Report Year 2015

Regulatory Fee Calculation - Charter Authority

15 Total number of vehicles used for intrastate charter & excursion operations for operating year 104

16 Regulatory Fee for Operated Vehicles (Line 15) 104 x \$25.00 2,600.00

Agency Use Only 001-111-0268-232-01

17 Penalty on regulatory fees paid after May 2

18 Enter amount from Line 16 x 2% X 0.02 \$0.00

19 Interest on regulatory fees paid after May 31

20 Amount from Line 16 x number of months past May 31 x 1% X X 0.01 \$0.00

21 Total penalties and interest due (add lines 18 and 20) \$0.00

Agency Use Only 001-111-0268-232-11

FEE SUMMARY

	Auto-Trans	Charter	
22 Total regulatory fees	Line 4 <u>36,984</u>	Line 16 <u>2,600.00</u>	
23 Total mileage fees	Line 7 <u>9,477</u>		
24 Total penalties and interest	Line 14 <u>0</u>	Line 21 <u>0</u>	
25 GRAND TOTAL	Total (A): <u>46,461</u>	Total (B): <u>2,600.00</u>	<u>49,061.00</u> Add Total (A) & Total (B)

****Note:** Gross Washington intrastate operating revenue is defined as all revenue collected for the year from rates under tariffs and contracts on file at the Washington Utilities and Transportation Commission. The revenues subject to the Commission's regulatory fees are gross Washington intrastate revenues before deductions for uncollectibles, unbillables, or the payment of state and federal taxes, i.e. "Gross Revenues" means before any deductions from Revenue Receipts.

COMMISSION USE ONLY

Reception #: 05830 001-111-0268-230-01 36,984.11

Reference: AR2015 001-111-0268-230-11

Payment ID: 57547 001-108-0170-230-13 9,476.76

001-111-0268-232-01

001-111-0268-232-11 2,600

001-111-0268-032-20 .63

001R-111-0268-032-20 ()

Total Paid: 49,061.00

End Regulatory Fee Calculation Schedule

Schedule 2

Year	Make	Model	State of Reg	Lic No	VIN	Number	Seating
2007	Ford	Krystal F550	WA	B45055D	1HVBTAAM67H426269	103	36
2007	Chevy	5500	WA	B45053D	1GBE5V1G97F419606	104	29
2007	Chevy	5500	WA	B45052D	1GBE5V1G17F419969	105	29
2007	Chevy	5500	WA	B45054D	1GBE5V1G37F420072	106	29
2007	Chevy	Turtle Top C5500 (L)	WA	B51893G	1GBJ5V1997F418925	107	32
2011	Ford	Bus F-550	WA	B61922S	1FDGF5GT8BEB78122	110	33
2009	Chevy	Turtle Top C5500 (L)	WA	B61648S	1GBJ5V1918F414871	111	32
2009	Ford	Bus E-450 (PB)	WA	B61649S	1FDXE45S27DA83642	112	16
2011	Ford	Champion F550	WA	B85266S	1FDGF5GT5BEC26367	113	29
2011	Ford	Krystal F550	WA	B85269S	1FDAF5GY0BEB76964	114	29
2011	Ford	Krystal F550	WA	B85267S	1FDUF5GT6BEB59474	115	29
2011	Ford	Krystal F550	WA	B85308S	1FDUF5GT8BEB67575	116	29
2011	Ford	Krystal F550	WA	B85462S	1FDUF5GT9BEC31784	117	32
2011	Ford	Champion F550	WA	B19526T	1FDGF5GT8BEC37977	118	32
2005	Chevy	ADA Van	WA	B93210T	1GBDV13E95D114535	200	4
2008	Chevy	ADA Van	WA	S46ZRZ	1GBDV13W18D210933	201	4
2010	Ford	E-350 S-DUT	WA	B59664Y	1FBSS3BL6ADA66661	900	10
2010	Ford	E-350 S-DUT	WA	B96750Y	1FBSS3BL1ADA66664	901	10
2010	Ford	E-350 S-DUT	WA	B96751Y	1FBSS3BLXADA66663	902	10
2010	Ford	E-350 S-DUT	WA	B96752Y	1FBSS3BL8ADA66662	903	10
2010	Ford	E-350 S-DUT	WA	B96753Y	1FBSS3BL3ADA66665	904	10
2010	Ford	E-350 S-DUT	WA	B96754Y	1FBSS3BL5ADA66666	905	10
2010	Ford	E-350 S-DUT	WA	B96755Y	1FBSS3BL7ADA66667	906	10
2010	Ford	E-350 S-DUT	WA	B96756Y	1FBSS3BL9ADA66668	907	10
2010	Ford	E-350 S-DUT	WA	B96757Y	1FBSS3BL7ADA66670	909	10
2009	Ford	E-350 XLT	WA	B71382R	1FBSS31L69DA09910	910	10
2009	Ford	E-350 XLT	WA	B71383R	1FBSS31L69DA17201	911	10
2009	Ford	E-350 XLT	WA	021-ZDD	1FBSS31L59DA75039	912	10
2009	Ford	E-350 XLT	WA	B91697H	1FBSS31L59DA57703	913	10
2009	Ford	E-350 XLT	WA	B86713S	1FBSS31L59DA51436	914	10
2009	Ford	E-350 XLT	WA	B86712S	1FBSS31L79DA51440	915	10
2009	Ford	E-350 XLT	WA	B17733X	1FBSS31L49DA59284	916	10
2009	Ford	E-350 XLT	WA	B96771Y	1FBSS31L09DA12110	917	10
2009	Ford	E-350 XLT	WA	B86717S	1FBSS31L99DA51438	918	10
2009	Ford	E-350 XLT	WA	B86716S	1FBSS31L79DA12119	919	10
2009	Ford	E-350 XLT	WA	B86718S	1FBSS31L89DA12114	920	10
2009	Ford	E-350 XLT	WA	B86719S	1FBSS31L79DA33908	921	10
2009	Ford	E-350 XLT	WA	B93640U	1FBSS31L89DA66786	922	10
2009	Ford	E-350 XLT	WA	B93639U	1FBSS31L79DA66780	923	10
2009	Ford	E-350 XLT	WA	B93638U	1FBSS31L29DA69005	924	10
2009	Ford	E-350 XLT	WA	B93726U	1FBSS31L49DA68969	925	10
2009	Ford	E-350 XLT	WA	B99856V	1FBSS31L49DA66784	926	10
2009	Ford	E-350 XLT	WA	B76912V	1FBSS31L19DA09314	927	10
2009	Ford	E-350 XLT	WA	C00136A	1FBSS31L19DA53863	928	10
2009	Ford	E-350 XLT	WA	B80990V	1FBSS31L69DA27260	929	10
2009	Ford	E-350 XLT	WA	B91695H	1FBSS31L69DA57701	930	10
2009	Ford	E-350 XLT	WA	B99858V	1FBSS31L49DA09243	931	10
2009	Ford	E-350 XLT	WA	B99860V	1FBSS31L69DA59285	932	10
2009	Ford	E-350 XLT	WA	B76908V	1FBSS31L39DA66808	933	10
2009	Ford	E-350 XLT	WA	B99857V	1FBSS31L79DA59277	934	10
2009	Ford	E-350 XLT	WA	B99854V	1FBSS31LX9DA63839	935	10
2009	Ford	E-350 XLT	WA	B99859V	1FBSS31L09DA51442	936	10
2009	Ford	E-350 XLT	WA	B99855V	1FBSS31L39DA51435	937	10
2009	Ford	E-350 XLT	WA	B76911V	1FBSS31L79DA74975	938	10
2009	Ford	E-350 XLT	WA	B76909V	1FBSS31L39DA52259	939	10
2009	Ford	E-350 XLT	WA	B91691H	1FBSS31L89DA57697	940	10
2009	Ford	E-350 XLT	WA	B76913V	1FBSS31L19DA66788	941	10
2010	Ford	E-350 XLT	WA	B30619X	1FBSS3BL9ADA81672	942	10
2010	Ford	WSD/ES	WA	B30621X	1FBSS3BL4ADA81675	943	10
2010	Ford	WSD/ES	WA	B30585X	1FBSS3BL2ADA81674	944	10
2010	Ford	WSD/ES	WA	B30583X	1FBSS3BL5ADA18245	945	10
2010	Ford	WSD/ES	WA	B30622X	1FBSS3BL7ADA81671	946	10
2010	Ford	WSD/ES	WA	B30618X	1FBSS3BL7ADA81668	947	10
2010	Ford	WSD/ES	WA	B30584X	1FBSS3BL9ADA81669	948	10
2010	Ford	WSD/ES	WA	B30620X	1FBSS3BL1ADA18243	949	10
2011	Ford	WSD/ES	WA	B59450Y	1FBSS3BL18DB17761	950	10
2011	Ford	WSD/ES	WA	B59451Y	1FBSS3BL3BDA47812	951	10

Schedule 2

Year	Make	Model	State of Reg	Lic No	VIN	Number	Seating
2011	Ford	WSD/ES	WA	B59449Y	1FBSS3BL3CDA20482	952	10
2011	Ford	WSD/ES	WA	B32452Z	1FBSS3BL3BDB11301	953	10
2011	Ford	WSD/ES	WA	B96877Y	1FBSS3BL8BDB37246	954	10
2011	Ford	WSD/ES	WA	B70599Z	1FBSS3BL8BDB37263	955	10
2011	Ford	WSD/ES	WA	B32450Z	1FBSS3BL2BDB37260	956	10
2011	Ford	E-350 XLT	WA	B96879Y	1FBSS3BL3BDB37266	957	10
2011	Ford	E-350 XLT	WA	B96878Y	1FBSS3BL1BDB37248	958	10
2011	Ford	E-350 XLT	WA	B32451Z	1FBSS3BL4BDB37258	959	10
2011	Ford	E-350 XLT	WA	B59657Y	1FBSS3BLXBDB17094	1013	14
2012	Ford	E-350	WA	AIM9815	1FBSS3BL6CDA98836	1014	14
2013	Ford	E-350 XLT	WA	C42354D	1FBSS3BL0DDA34423	1015	10
2011	Ford	E-350 XLT	WA	B59656Y	1FBSS3BL9CDA56077	1113	14
2012	Ford	E-350	WA	A1Z4272	1FBSS3BL8CDB20447	1114	14
2013	Ford	E-350 XLT	WA	C42352D	1FBSS3BL1DDA87194	1115	10
2012	Ford	E-350	WA	AIM9686	1FBSS3BL4CDA98835	1214	10
2013	Ford	E-350 XLT	WA	C42357D	1FBSS3BLXDDA61337	1215	10
2013	Ford	WSD/ES	WA	C13426B	1FBSS3BL6DDA00812	1314	10
2013	Ford	E-350 XLT	WA	C42356D	1FBSS3BL1DDA61338	1315	10
2013	Ford	WSD/ES	WA	C13427B	1FBSS3BL6DDA43269	1414	10
2013	Ford	E-350 XLT	WA	C42355D	1FBSS3BL4DDA43142	1415	10
2013	Ford	WSD/ES	WA	C13428B	1FBSS3BL6DDA43143	1514	10
2013	Ford	E-350 XLT	WA	C73414D	1FBSS3BL1DDB13325	1515	10
2013	Ford	E-350 XLT	WA	C73415D	1FBSS3BL9DDA43105	1615	10
2000	MCI	MCI DL3 W/C	WA	APH9633	1M8PDMTA0YP052537	501455	55
2007	MCI	D4505	WA	C01849D	1M86DMPA47P057759	501555	55
2000	MCI	MCI DL3 W/C	WA	APH9632	1M8PDMTAXYP052528	511455	55
2007	MCI	D4505	WA	C01848D	1M86DMPAX7P057555	511555	55
1999	MCI	102 DL3	WA	C60569A	1M8PDMPA4XP052159	521455	55
2007	MCI	D4505	WA	C01810D	1M86DMPA37P057557	521555	55
2000	MCI	102 DL3 W/C	WA	C60570A	1M8PDMTA7YP052535	531455	55
2007	MCI	D4505	WA	C01851D	1M86DMPA57P057558	531555	55
2007	MCI	D4505	WA	C01850D	1M86DMPA37P057560	541555	55
2005	MCI	J4500	WA	C01856D	2M93JMPA95W062783	551555	55
2013	Ford	Turtle Top F550 (L)	WA	B14797Y	1FDAF5GYXDEA24824	601326	26
2014	Ford	E-350	WA	C14431B	1FDEE3FL2EDA67303	601414	14
2013	Ford	Turtle Top F550 (L)	WA	B14796Y	1FDAF5GY1DEA24825	611326	26
2014	Ford	E-350	WA	C14430B	1FDEE3FL3EDA67360	611414	14

TC-161257
APPENDIX A APPLICABLE LAWS AND RULES

**SCHEDULE 4
OPERATING STATISTICS**

Scheduled Service by Reservation	Route 1	Route 2	Route 3	Route 4	Route 5	Route 6	Route 7	Route 8	Route 9	Route 10	Route 11	Route 12	Route 13	Route 14	Route 15	Route 16	Route 17
Number of terminals between stops	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total distance between terminals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total number of trips annually for each route	1,153	1,189	662	6,571	936	5,128	7,271	1,918	3,366	1,577	4,360	40	420	166	71	209	14,749
Total passengers carried annual per route	1,383	1,441	782	11,983	1,667	7,171	12,601	14,389	6,661	2,919	7,854	207	2,300	808	309	1,072	43,987

Door to Door by Reservation	2015
Annual total number of trips	88,990
Annual total passengers carried	241,529

PAYMENT INFORMATION

The commission accepts the following methods of payment:

- Cash (in-person at commission)
- Check (must be in US Funds)
- Online payments* (ACH, American Express, Discover/Novus, Mastercard, Visa)
- Pay-by-phone (credit card payments only) at (360) 664-1349

**Please note: A convenience fee of 2.5 percent (minimum of \$3.95) is charged by Official Payments for using the credit card processing service.*

To pay online visit:

<https://fortress.wa.gov/wutc/utcweb/regulatedIndustries/Pages/onlinepayments.asp>

FILING YOUR REPORT

All annual reports and regulatory fees must be received by the commission no later than May 1 each year (or the following business day if May 1 lands on a weekend). Postmark dates are not considered the date received. It is strongly recommended to use a mail delivery service, such as certified mail via USPS, with delivery confirmation or filing online to receive an email notification of receipt.

Reports may be mailed, faxed, delivered in person or submitted online:

- Mail to: *(recommend via certified mail no later than April 15 to ensure timely delivery)*
Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504
- Physical Address for express delivery services (Fedex, UPS):
1300 S. Evergreen Park Dr. S.W.
Olympia, WA 98504
- Fax to: (360) 664-1289 *(Contact commission staff below to verify receipt)*
- File online using the commission e-file system: *(System will generate automatic email receipt)*
<https://fortress.wa.gov/wutc/utcweb/docs/Pages/ElectronicFiling.asp>

NEED MORE ASSISTANCE?

For more information about annual reports please reference the Annual Report FAQ document at the website below or contact Kim Anderson at (360) 664-1153 or kanderso@utc.wa.gov.

<https://fortress.wa.gov/wutc/utcweb/regulatedindustries/Pages/annualReports.aspx>

REQUESTED BY: Dave Pratt

UTC STAFF DATA REQUEST NO. 1:

Please provide Staff with copies of your response(s), when available, to Speedishuttle's Second Set of Data Requests (propounded 1/20/17) and to any future Speedishuttle data requests related to the topics of unauthorized commissions or rescue service/independent contractors.

UTC STAFF DATA REQUEST NO. 2:

For the period of time beginning January 16, 2014, and ending September 29, 2016:

- a. Identify each occurrence in which Shuttle Express used an independent contractor to provide **any** transportation service, including shared ride, rescue, luxury upgrade, or any other term used by Shuttle Express to describe the provision of transportation services.
- b. For each occurrence, provide the date of service, the independent contractor's name, the trip's origin(s) and destination(s), the customer's name(s), the type of transportation provided (shared ride, rescue, luxury upgrade, or any other term used by Shuttle Express to describe the provision of transportation services), the number of stops, and the amount of revenue generated (including total cost to the customer and a breakdown of how much went to the independent contractor and how much Shuttle Express retained).

This information may be provided as a spreadsheet or table.

UTC STAFF DATA REQUEST NO. 3:

Staff assumes that when Shuttle Express refers a job to an independent, some form of written or electronic communication describing the job is generated. For each occurrence in which Shuttle Express used an independent contractor to provide transportation from January 16, 2014, to September 29, 2016, please provide a copy of all associated referral documentation.

REQUESTED BY: Danny Kermode

UTC STAFF DATA REQUEST NO. 4:

Is Shuttle Express, or any affiliate of Shuttle Express, currently paying, rewarding or in any way compensating concierges, bellhops, travel agents or other hotel or facility personnel (regardless of job title) to refer or direct passengers to Shuttle Express?

UTC STAFF DATA REQUEST NO. 5:

For the period of time beginning January 16, 2014, and ending December 31, 2016, has Shuttle Express, or any affiliate of Shuttle Express, paid, rewarded, or in any way compensated any concierges, bellhops, travel agents or any other hotel or facility personnel (regardless of job title) to refer or direct passengers to Shuttle Express?

UTC STAFF DATA REQUEST NO. 6:

Please provide the number of IRS forms 1099 Miscellaneous Income, Shuttle Express issued in 2015, if any.

UTC STAFF DATA REQUEST NO. 7:

During 2016, did Shuttle Express, or any of its affiliates, pay, reward, or in any way compensate Ted Milano, concierge for the Westin in Seattle, Washington, to refer or direct passengers to Shuttle Express? If applicable, please provide the following:

- a. If payment(s) were made (e.g., cash, check or any other form of disbursement), please provide the related disbursement journal for the day prior to, of and after such payment.
- b. Please provide the company name and general ledger account number/name used to expense the payment.
- c. Please provide the vendor ledger for Mr. Milano reflecting the history of payments.
- d. If some form of compensation or reward was provided other than cash, describe the form of the compensation and explain how it was computed or derived.

JULIAN BEATTIE
Assistant Attorney General

All Reservations 730,827
 5.57%
 40,727

Date	Res ID	Stops	Trip ID	Pick up Loc	Drop off Loc	Base Fare	IC Received
01/16/14	4020480	1	3670876	98375	Sea Tac	82.00	65.60
01/16/14	4020706	1	3671663	98375	Sea Tac	82.00	65.60
01/16/14	4019761	1	3670879	98023	Sea Tac	40.00	32.00
01/16/14	4019123	1	3671668	98177	Sea Tac	46.00	36.80
01/16/14	4021837	1	3672032	Sea Tac	98002	47.00	37.60
01/16/14	4021890	1	3672080	Sea Tac	98053	50.00	40.00
01/16/14	4022012	1	3672170	Sea Tac	98144	39.00	31.20
01/16/14	4013516	1	3672282	Sea Tac	98372	55.00	44.00
01/16/14	4005073	1	3672308	Sea Tac	98422	39.00	31.20
01/16/14	4017349	1	3672326	Sea Tac	98055	22.00	17.60
01/17/14	4019289	1	3672392	98133	Sea Tac	46.00	36.80
01/17/14	4017303	1	3671949	98023	Sea Tac	40.00	32.00
01/17/14	4021932	1	3672108	98031	Sea Tac	39.00	31.20
01/17/14	4007592	1	3671721	98499	Sea Tac	41.00	32.80
01/17/14	4021935	1	3671760	98155	Sea Tac	40.00	32.00
01/17/14	4012116	1	3672841	Sea Tac	98052	45.00	36.00
01/17/14	4022205	1	3672945	Sea Tac	98136	40.00	32.00
01/17/14	4023119	1	3673111	Sea Tac	98055	32.00	25.60
01/17/14	3990741	1	3673110	Sea Tac	98116	30.00	24.00
01/17/14	4023061	1	3673137	Sea Tac	98055	32.00	25.60
01/18/14	4022288	1	3673181	98117	Sea Tac	44.00	35.20
01/18/14	4022348	1	3673196	98391	Sea Tac	72.00	57.60
01/18/14	4021522	1	3672450	98055	Sea Tac	38.00	30.40
01/18/14	4023355	1	3673457	Sea Tac	98006	41.00	32.80
01/18/14	4018492	1	3673568	Sea Tac	98136	30.00	24.00
01/18/14	4007262	1	3673603	Sea Tac	98058	29.00	23.20
01/18/14	4023335	1	3673604	Sea Tac	98092	47.00	37.60
01/18/14	4004092	1	3673618	Sea Tac	98027	52.00	41.60
01/18/14	3999719	1	3673638	Sea Tac	98032	22.00	17.60
01/18/14	4022987	1	3673639	Sea Tac	98059	39.00	31.20
01/18/14	4022751	1	3672817	98033	Sea Tac	40.00	32.00
01/18/14	4023026	1	3673007	98136	Sea Tac	40.00	32.00
01/18/14	4015603	1	3673689	Sea Tac	98042	38.00	30.40
01/18/14	4020523	1	3673691	Sea Tac	98146	29.00	23.20