

August 29th,2023

UTC Commission,

I am writing to present a rebuttal on behalf of Rocket Van Lines regarding the penalties assessed by the Commission. We believe that these penalties should not imposed for the following reasons:

1. Failing to maintain cargo insurance: While it is true that there were eight violations of WAC 480-15-550, it is important to note that Rocket Van Lines had cargo insurance of \$10,000. We were not aware that the requirement for Washington State mandated a minimum coverage of \$20,000, which is higher than Federal requirements. This discrepancy was an oversight on our part, and we argue that this should not be considered a willful violation but rather a misunderstanding. We have since rectified this and obtained the required \$20,000 cargo insurance.

2. Failing to conduct or retain paperwork containing criminal background checks: We acknowledge the violation of WAC 480-15-555. However, we would like to explain that Martin Moylan, the employee in question, did undergo a background check. Although it was conducted one month after the hire date, this was due to our internal protocol of conducting background checks as a precautionary measure. The delay in obtaining the background check result was not intentional and should not be held against us as a violation.

3. Using a driver not medically examined and certified: While we acknowledge the eight violations of 49 C.F.R. § 391.45(a), we believed that a medical card was optional for non-CDL trucks, as advised by the Idaho State Police during our interview. We now understand that this was a misunderstanding on our part and have ensured that all our drivers comply with the medical examination and certification requirements.

Considering the circumstances and our immediate actions to rectify any oversights, we respectfully request that the penalties imposed waived entirely. We deeply value our commitment to safety and compliance, and we assure you that we have taken the necessary steps to address these infractions and prevent them from occurring in the future.

Thank you for your time and consideration. We are confident that a fair assessment of the situation will lead to a satisfactory resolution.

Sincerely,

Amanda
Operations Manager
Rocket Van Lines LLC