

**From:** [San Juan Transit](#)  
**To:** [UTC DL Records Center](#)  
**Subject:** Docket TC-141124  
**Date:** Friday, August 19, 2016 11:32:24 PM

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Washington Utilities and Transit Commission,

RE: Docket Number TC-106821

Thank you for the opportunity for public comment regarding Docket Number TC-106821, the Friday Harbor Jolly Trolley's petition for forbearance from rate regulations. As the owner of San Juan Transit, we currently hold charter and excursion authority with forbearance under certificate CH-1006. When San Juan Transit petitioned the Washington Utilities and Transit Commission for forbearance in the Spring of 2014 (Docket TC-141124) after holding transit authority certificate C-1006 for 20+ years, I did not realize I would be giving up the rights to the routes we service in San Juan County. Though I appreciate the convenience of forbearance, it is simply not possible to compete for riders when companies like the Friday Harbor Jolly Trolley and San Juan Taxi (who purchased a shuttle bus and is in the process of applying for permits) can receive forbearance, occupy the bus stops, run intermittent schedules, adjust their pricing or offer riders free transport in order to keep riders off the San Juan Transit buses.

I believe San Juan Transit is using RCW 81.68.015 in the way it was intended, offering a comprehensive transit schedule that services the needs of the public living in or visiting San Juan County. Like any transit service we use the volume and income generated from high ridership times to offset the lower volume/ridership. It has been my observation the Friday Harbor Jolly Trolley is only operating during peak times, despite publishing a full 7 day a week schedule. Operating only during peak times is a sound business plan but does not serve the complete needs of the public and adversely affects San Juan Transit's ability to do so.

It is apparent Friday Harbor Jolly Trolley is requesting forbearance from rate and service regulations solely to be able to provide drop-off and pick-up service to better compete with San Juan Transit. This creates a scenario where the company with the deepest pockets will be the only company on the road. In the Friday Harbor Jolly Trolley's original application they state they will be "operating a trolley around Friday Harbor, WA...stopping @ approximately 10-12 stops explaining the history of San Juan Island a few times a day. Times and places are subject to change depending on the day." They say nothing about operating a transit schedule or allowing drop-offs and pick-ups. Their description of service fits the definition of an excursion company, it is therefore, my request the Commission honor the current certificate held by Friday Harbor Jolly Trolley and deny forbearance.

If necessary San Juan Transit will petition the Commission to reverse the forbearance afforded to us in 2014. The consistent, reliable service we provide has turned into essential transit for hundreds of employees of Roche Harbor. Many of these workers are not allowed to bring a vehicle to work or live on site for the season. In addition the Roche Harbor Marina and the Friday Harbor Marina host hundreds of "live aboards" who do not have access to a vehicle. Our transit is essential in providing affordable transportation to doctor's appointments, grocery shopping, the marine

supply store, access to the Washington State Ferry Terminal and other necessities of life. Multiple San Juan County residents have purchased San Juan Transit Commuter Passes for their families, allowing their children to have safe and dependable access to the library, stores, shops and services available only in Friday Harbor.

In closing, I'm concerned a precedent is being set, if any charter/excursion company can receive forbearance then those companies like San Juan Transit, who are operating a public transit service will be at a huge disadvantage. I would ask the Commission to uphold the integrity of RCW 81.68.015 and offer forbearance to transportation companies who provide a transit services, not to charter/excursion companies specializing in tours.

Thank you for your consideration to this issue,

Sincerely,

Kraig Hansen  
San Juan Transit  
360-378-8887 Office