

# Shuttle Express response to TC-161262 SBEIS Questionnaire, 4/28/2017

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Total Employees as of 4/28/2017 – 176

WAC 480-30-222(4) – Should this rule be accepted as written, Shuttle Express would face additional costs in relation to the maintenance of records required for vehicles that may not be owned by the company. While records are currently required in substantially the same form as required under (4) of this WAC for all vehicles owned, adding this requirement for non-owned vehicles presents additional recordkeeping and verification costs associated with those vehicles not anticipated or currently required. A change in the rule allowing the contractor or vehicle owner to maintain the records, but be required to present them to the commission upon 1 business day notice for inspection would eliminate the requirement of the certificated operator to require every daily/weekly/monthly/annual inspection, repair whether minor (i.e. replacement brake light or scratch removal) or major (i.e. hood replacement, transmission rebuild), or maintenance item (i.e. refill washer fluid, oil change) be documented as soon as it has occurred and be provided and logged by the non-owning company. The cost of this, both in lost revenue due to not allowing a vehicle to be used if ANY work has been done on it until the documentation is received to ensure compliance, as well as the staff, systems, and verification that the files are up to date at all times is not easily estimable. The cost would adjust based on the number of contractor/vehicles used, and the frequency of the maintenance, repairs, and inspections.

WAC 480-30-222(5) – This rule also creates additional burden of cost as written. Whiel the section describing the requirement to have a limousine chauffeur license would create no additional cost or expense, the additional qualifications for other drivers (essentially for-hire licensed drivers) requires duplication of work already performed and required at the county level prior to obtaining a license. The securement and verification of the documents, and lack of timelines could potentially require an operator to run (for (5)(b)) a driver abstract prior to any operation, up to daily reviews. The cost of that alone is approximately \$12.00 per driver per day. A simple change to this rule would be to require either a licensed limousine chauffeur under 46.72A, or a licensed for-hire driver under the applicable rule/law. This requirement would thus simplify the recordkeeping and compliance verification for the certificated company to simply verifying that the credentials (limousine or for-hire) are current, valid, and up to date thus providing a single point of reference to the required qualifications (which already

disqualify one from obtaining those credentials should they not pass the appropriate screenings/checks by the appropriate regulatory body).

WAC 480-30-231 – The cost associated with the rule as written is unknown at this time as the rules seem ambiguous as to what the display requires. Should it be assumed that the marking be attached to the outside of the vehicle, such as with a magnetic sticker or some other external decal, there may be a conflict with limousine rules which could impose costs in the way of fines or loss of limousine certification if operating with external markings, as well as cost to the certificated operator in producing the magnetic signs, and potential insurance liability should they become dislodged from the vehicle. Interior signage displayed through the windows is a possible options, but a large number of vehicles have tinted windows which would render the identifiability as non-compliant. Alternate options to this rule would include display of the required information through the front windshield for the entire time operating as an auto transportation contractor (i.e. from dispatch, through to completion of trip), and cost to produce appropriate signage would be minimal at best.