

## **RESPONSE TO SMALL BUSINESS ECONOMIC IMPACT STATEMENT (SBEIS)**

**Re: Rulemaking to Consider Rate Setting Flexibility and Competition for Auto Transportation Companies in WAC 480-30, Docket TC-121328**

**Bremerton-Kitsap Airporter, Inc.**

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**Company employs 50 full or part time employees**

### **WAC 480-30-096 Certificates, application filings, general**

A possible cost impact would be realized if a competing operator who offers both scheduled and door to door service is permitted to share the same service area as the Bremerton-Kitsap Airporter, Inc. In this event, the scheduled consumer base is potentially divided between the two operators (current and new operator) resulting in both the fixed and variable operating expenses shared by a smaller number of customers. A proposed service operator could claim that customer service would be improved if the operator proposes to also provide "door to door" service in addition to "scheduled" service. In Kitsap County, "door to door" service does not work where a highly popular scheduled service also operates. BKA, Inc. has tried door to door service under our charter authority (van and town car) but to date we have experienced limited usage.

### **WAC 480-30-YYY Fare Flexibility**

With fare flexibility, monthly costs for implementing fuel surcharge changes is eliminated thereby creating a cost savings to the company. In addition, rate change or other tariff filings are eliminated except for the annual 5% filings, thereby saving considerable accounting effort and associated costs.

**Respectfully submitted:**

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