

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of Determining the Proper
Carrier Classification of, and Complaint
for Penalties Against:

BLESSED LIMOUSINE INC.

DOCKET TE-151667

COMMISSION STAFF'S RESPONSE
TO BLESSED LIMOUSINE, INC.'S
MOTION FOR LEAVE TO COMPLY
WITH FINANCIAL PENALTY VIA
PAYMENTS

I. BACKGROUND

1 On January 26, 2016, the Washington Utilities and Transportation Commission
("Commission") entered its Final Order, Order 03, in Docket TE-151667 in the Matter of
Determining the Proper Carrier Classification of, and Complaint for Penalties against
Blessed Limousine, Inc. ("Order 03"). Order 03 imposed penalties against Blessed
Limousine, Inc. ("the Company") and suspended part of those penalties subject to certain
conditions.

2 On February 1, 2016, through its attorney, David Ruzumna, the Company filed a
Motion for Leave to Comply with Financial Penalty via Payments. This motion
acknowledges that the Company accepts Order 03, but cannot make full payment of the
unsuspended penalties and requests the ability to pay in installments.

3 Commission Staff ("Staff") files this response pursuant to WAC 480-07-375 and
supports the establishment of a payment plan that would permit the Company to pay its
penalty amount in installments.

II. RESPONSE TO MOTION

4 Staff supports establishing a payment plan for the Company to pay the unsuspended penalty amount from Order 03, but would like additional clarity for the schedule of installments and for the conditions of those installments.

5 Staff recommends that the Company be allowed to pay the unsuspended penalty amount of \$4,000.00 in 20 consecutive monthly installments of a minimum of \$200.00 per month, each of which is due and payable no later than the 5th day of each month beginning February 5, 2016. If no more than \$200.00 is paid each month, the final installment of \$200.00 would be required on September 5, 2017. See Staff's Proposed Installment Schedule below.

Proposed Installment Schedule		
Installment	Due Date	Amount
1	February 5, 2016	\$200.00
2	March 5, 2016	\$200.00
3	April 5, 2016	\$200.00
4	May 5, 2016	\$200.00
5	June 5, 2016	\$200.00
6	July 5, 2016	\$200.00
7	August 5, 2016	\$200.00
8	September 5, 2016	\$200.00
9	October 5, 2016	\$200.00
10	November 5, 2016	\$200.00
11	December 5, 2016	\$200.00
12	January 5, 2017	\$200.00
13	February 5, 2017	\$200.00
14	March 5, 2017	\$200.00
15	April 5, 2017	\$200.00
16	May 5, 2017	\$200.00
17	June 5, 2017	\$200.00
18	July 5, 2017	\$200.00
19	August 5, 2017	\$200.00
20	September 5, 2017	\$200.00
	Total:	\$4,000.00

6 Staff recommends that the Company be allowed to make additional payments in
advance of these due dates or pay an increased amount on these due dates, if it so desires,
for the purpose of discharging its full payment obligation early, but that no additional
payment or increased amount will relieve the Company of its obligation to make its timely
monthly installment of \$200.00 until the full unsuspended amount of \$4,000.00 is satisfied.

7 Staff recommends that, should the Company fail to pay any installment by the due
date, or fail to pay at least the minimum amount of \$200.00 by the due date, the entire
remaining balance of payments and the entire suspended portion of the penalty become
immediately due and payable without further Commission order.

8 Staff recommends that, should the Company fail to comply with any condition of
Order 03, Paragraph 19,¹ the entire remaining balance of payments and the entire suspended
portion of the penalty become immediately due and payable without further Commission
order.

9 Staff notes that the conditions of Order 03 require the Company to cease and desist
offering, advertising, and providing charter party or excursion carrier services and provide

¹ Order 03, Paragraph 19 states:

“We impose a penalty of \$10,000 and suspend a \$6,000 portion of the penalty for a period of two years subject to the following conditions:

1) Blessed Limousine must pay the \$4,000 penalty amount that is not suspended within 10 business days of the date of this Order;

2) Blessed Limousine must either file a complete application for a certificate to operate as a charter party or excursion carrier no later than February 10, 2016, or provide documentation to the Commission’s satisfaction that Blessed Limousine no longer advertises or offers to provide charter party or excursion carrier services;

3) Blessed Limousine must cease and desist offering, advertising, and providing charter party or excursion carrier services unless and until it obtains the required certificate from the Commission;

4) Blessed Limousine must allow Staff to inspect any vehicles the Company owns and uses for charter party or excursion carrier services; and

5) Blessed Limousine must comply with applicable statutes and Commission rules for a period of two years from the effective date of this Order.

If the Company complies with these conditions, the Commission will waive the suspended portion of the penalty.”

documentation to that effect unless it obtains the required certificate from the Commission.² Staff is willing to assist the Company in its endeavor to comply with the Commission's order: should the Company request its assistance, Staff would review, provide feedback, and also provide technical assistance regarding the Company's advertising.

10 Staff recommends that, consistent with Order 03, the suspended \$6,000.00 penalty amount should be suspended for, and waived after, 24 months from entry of Order 03 (January 26, 2018), provided that the Company, upon inspection by Staff, incurs no repeat violation of RCW 81.70.220(1) during that time. Staff will commence a review within 24 months from the date Order 03 was entered and provide a recommendation as to whether the suspended penalty should be waived or imposed.

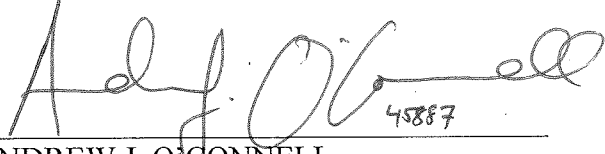
III. CONCLUSION

11 Staff supports the establishment of a payment plan that would permit the Company to pay its penalty amount in installments and offers its recommendations in this Response to provide clarity for establishing such a plan.

DATED February 2, 2016.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General


45887
ANDREW J. O'CONNELL
Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff

² Order 03, ¶ 19.