

From: [Rose, Chris \(UTC\)](#)
To: [UTC DL Records Center](#)
Subject: FW: UTC Rulemaking Project Regarding WAC 480-30: Docket TC-161262
Date: Wednesday, May 3, 2017 1:18:45 PM

Please add this to the record for TC-161262.

From: mikelauver@gmail.com [mailto:mikelauver@gmail.com] **On Behalf Of** Mike Lauver
Sent: Friday, April 7, 2017 1:56 PM
To: Rose, Chris (UTC) <crose@utc.wa.gov>
Cc: James Johnson <james@seatacshuttle.com>; John Solin <john@seatacshuttle.com>; Richard Johnson <richard@airporter.com>; jimf@capair.com; reasche@aol.com
Subject: Re: UTC Rulemaking Project Regarding WAC 480-30: Docket TC-161262

Chris,

In reviewing the proposed language of 480-30-022 I see the words "A passenger transportation company *may* contract....." no where do I see that the UTC is compelling TNC's to come under the regulatory authority of the commission. If all of this work is just so that we can dilute our safety and insurance standards and heir "contractors" then I feel that this has been a colossal waste of time, effort and money. It strikes me as superfluous regulation particularly in that the proposal requires that each vehicle be covered under a limo or for heir DOL license. With either of those licenses the operator has no need to interact with the commission. Also just FYI, the DOL does not offer a "limousine Chauffeur" license for drivers.

Now it is very possible that I am not interpreting the proposed language correctly and it is the intent of the proposal that **ALL** passenger transportation, including the TNCs be brought under the regulatory authority of the commission which, if the commission truly is concerned with leveling the playing field, is the only course of action that would begin to do so. If in fact that is the case how will taxi/for heir companies be dealt with?

Presuming that DOL will shoulder some of the regulatory burden is fanciful thinking. They have no functioning enforcement division and consequently their "investigators" have no incentive to follow up on gross violations.

This all being said, for the moment I have one question that needs be answered right away:

Does the commission propose to regulate TNCs under this modification to 480-30? Please answer either yes if so and point out the language that creates this regulatory authority, or no and then offer an explanation as to how the proposed language is in our or the public's best interest.

Thank you for clarifying this for me. Your answer will help me prepare for the May 11, 2017 work shop.

Mike Lauver
Seatac Shuttle, LLC

On Fri, Mar 31, 2017 at 2:33 PM, Rose, Chris (UTC) <crose@utc.wa.gov> wrote:

Interest Parties:

The Utilities and Transportation Commission (UTC) is engaged in a rulemaking to consider amendments to WAC 480-30, which pertains to UTC-regulated passenger transportation companies. Hopefully you have all previously received notice of this rulemaking by mail and/or email.

We have entered a new phase of the rulemaking. Attached is a Notice asking for comments on draft amendments to the rules (by April 28), and to announce a workshop that is scheduled for May 11. The details are in the Notice. Also attached are the draft amendments to the rules, a summary of the comments received during a March 2, 2017 workshop, and a Small Business Economic Impact Statement Questionnaire requesting that companies affected by the rules provide information to help us determine the cost impact of the amendments on the companies we regulate.

The document containing the draft amendments has comments on the right hand side intended to provide a brief explanation of the rule. The comments are not part of the draft amendments. They are intended only to help you review and comment on the amendments.

This may be a duplicate notice: the UTC Records Center sent these materials this morning to the agency's list of auto transportation, charter and excursion companies by regular mail, and to several other individuals by email. This email is intended to provide an electronic version to those companies for which I have an email address, and to also distribute the materials to individuals who asked to get copies of notices but are not yet on the official UTC distribution list (but soon will be).

If you have questions, please feel free to respond to this email.

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