

Targus, Lorri (UTC)

From: Paul Didelius <pd@ket-rail.com>
Sent: Monday, September 21, 2015 7:11 AM
To: UTC DL Records Center
Subject: Comment on TR-151079

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Good morning,

With regards to proposed language of WAC 480-62-
item 2b and 2b.i seem to unnecessarily duplicate robust existing requirements of federal regulations already in
force and having already driven a lasting industry standard. Requirement can only be duplicative or conflicting
..

item 4 will be hard for railroad to respond "within 90 days of the adoption of this rule" on a downline
commission finding / notification .. request more achievable response requirement ..

With regards to proposed language of WAC 480-62-300 item 2d strikes as burdensome, and in conflict
potentially with federal requirements of common carriage. Likely to bring costly litigation and be determined
beyond the right of state demand / federally pre-empted.

Thank you for your consideration.

Paul Didelius
Owner KET LLC
d.b.a. Kennewick Terminal RR