

Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 S Evergreen Park Dr SW
PO Box 47250
Olympia, WA 98504-7250

RE: TC-020497, Passenger Transportation Companies Rulemaking Review of Chapters of 480-30 WAC and 480-40 WAC

Ms Washburn:

In review of the draft rules, we are inclined, in general, to agree with most positions offered by Whidbey Sea-Tac Shuttle. Following, we will note some exceptions as we understand their points.

Rates (FARES)

We agree that there should be an allowable annual adjustment in fares, similar to that allowed in the state of Illinois. This would allow sufficient flexibility in individual fares to reflect differing market concerns in different areas (e.g. Tacoma area versus Olympia area).

General fare cases should be focused on what is reasonable compared to alternative modes of transportation (i.e. limousine, sedan , taxi, transit) rather than on revenue profit control.

Specific WAC Sections

WAC 480-30-036

“Cancellation” also refers to not operating a specific arrival or departure (e.g. when there are not reservations for a “reservations required” time.

“Door-to-door Service”—The proposed added distinction by Whidbey Sea-Tac Shuttle does not apply since there are a number of scheduled departures for door-to-door service from Sea-Tac Airport.

WAC 480-30-191...Insurance

The Commission needs to address the appropriate level of insurance to protect both the public and carrier interest. In the previous proceeding carriers agreed the level of insurance needed to be higher than the \$1.5 million level for under-16 passenger vehicles (very old federal limit) and that appropriate levels were necessary to protect responsible carriers from irresponsible carriers for a level playing field of expense. The limits should be a minimum of \$3 million single limits (combined personal injury and property liability).

WAC 480-30-216

Inspections of “airporter” vehicles need not be required since airport security inspects baggage before boarding flights.

WAC 480-30-166

Subcontractors other than auto transportation companies should be allowed with the certificate holder responsible through contract for contractors adherence to laws and rules.

Sincerely,

James N. Fricke
President
Capital Aeroporter