Targus, Lorri (UTC)

From:	Toby J. Van Altvorst <toby@wwrailroad.com></toby@wwrailroad.com>
Sent:	Monday, September 21, 2015 4:45 PM
То:	UTC DL Records Center
Subject:	Comment on TR-151079

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.

Toby J. Van Altvorst

Owner & General Manager

Western Washington Railroad, LLC

PO BOX 6720

Aloha, OR 97007

CELL: 541-912-1261

toby@wwrailroad.com