

**Draft Auto Transportation Rules- Chapter 480-30-WAC
Docket TC-121328**

The following comments are submitted by Bremerton-Kitsap Airporter, Inc. In general, BKA, Inc. concurs with most changes contained in the 2nd Draft Rules submitted on April 12, 2013 with the following recommendations for clarification:

WAC 480-30-096 Certificates, application filings, general

The rule requires applicants to state that the proposed service will be either “door to door” service, “scheduled service” or both. Rural areas or communities are not responsive for “door to door” service, particularly when a scheduled service is already provided in the service area which offers frequent service and low or reasonable fares. Such is the case in Kitsap County. Why would a person pay a premium fare for “door to door” service when a “scheduled fixed route” service is operating frequent trips a short distance from where he lives? We believe that a potential operator who offers both door to door and scheduled service would soon find the door to door service not utilized. If the applicant is permitted to operate in a service area which already has a scheduled service operation, both operators would soon go bankrupt or be forced to greatly reduce service in order to be profitable and remain in business.

WAC 480-30-YYY Fare Flexibility

The second draft proposes an initial maximum fare of 25 percent above the base fare, and a 5 percent increase from the base fare annually thereafter. We are in agreement with this methodology except that we propose that a 25 percent initial increase the first year be modified slightly to enable the operator to increase a fare from one service location by perhaps 28% and a 22% increase at another service location, so long as the total increase in fares is no more than 25%. This enables the operator to adjust fares between service locations where inequities exist. We are in agreement with the proposed 5% increase in succeeding years.

Respectfully submitted:

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