

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

In re: Request for Comments :  
SBIS :  
SeaTac Shuttle, LLC d/b/a : Docket No. TC-020497  
Whidbey-SeaTac Shuttle :  
: Passenger Transportation Company  
: (Bus) Rulemaking Draft  
:  
\_\_\_\_\_  
: November 9, 2005

DOCKET NO. 020497

**Draft 480-30 Economic Impact Comments**

The following, by statute section, are the estimated costs to a company of our current size, conducting our current and projected level of operations, above and beyond those required by the current WAC 480-30. The economic impact of some sections of the Draft cannot be evaluated as they pose potential unknown liabilities to the company. The listed costs are annualized. In many instances, objections to the sections involved were voiced in our comments on the content of the proposed Draft. All sections identified are either changes to the existing code or are sections of the code that we have been actively seeking to have reformed. Costs were calculated by estimating the number of management hours, staff hours, attorney hours, accountant hours, travel, fees, materials and duplicating costs involved. Each section identified will impose an economic burden on the company.

It should be noted that while we welcome the opportunity to comment on this Draft and its potential economic impact on our industry, we are disappointed the Commission has not produced a qualitative and quantitative analysis of the effect of this Draft in relation to its costs to the regulated parties as called for in Executive Order 97-02 as part of the drafting process. Additionally, in most instances cited here, we feel that the sections do not meet the test of Ex.Order 97-02 for Effectiveness and Efficiency in that they create more paper work, more filings, more postings, redundant data collection and reporting, certain regulations which serve no purpose and regulations which are either against existing law or in conflict with existing statute.

We still seek to meet with the Commission to discuss the details of the draft, its economic impact and reforms required in fare (rate) setting methodology.

**WAC 480-30-051 Mapping, auto transportation company.**

\$500

**480-30-056 Records retention, auto transportation company**

\$50,000.00

**WAC 480-30-071 Reporting requirements.**

\$2500.00

**WAC 480-30-086 Certificates, general. (3)**

\$1000.00

**WAC 480-30-116 Certificates, application docket, protests, and intervention, auto transportation company. (2)**

\$20,000.00

**WAC 480-30-136 Certificates, application hearings, auto transportation company. (5)(d)**

\$5000.00

**WAC 480-30-156 Certificates, temporary.**

Unknown

**WAC 480-30-191 Bodily injury and property damage liability insurance.**

\$10,000.00

**WAC 480-30-216 Operation of motor vehicles, general. (2)**

\$1000.00

**(7) Smoking on motor vehicles.**

\$500.00

**WAC 480-30-231 Vehicle and driver identification.**

Unknown

**WAC 480-30-236 Leasing vehicles.**

\$500.00

**WAC 480-30-241 Commission compliance policy.**

\$24,000.00

**WAC 480-30-281 Tariffs and time schedules, content.**

Impossible to evaluate, potentially infinite.

**WAC 480-30-286 Tariffs and time schedules, posting.**

\$1500.00

**WAC 480-30-316 Tariffs and time schedules, customer notice requirements.**

\$1500.00

**WAC 480-30-321 Tariffs and time schedules, notice verification and assistance.**

\$1000.00

**WAC 480-30-326 Tariffs and time schedules, less than statutory notice handling.  
(4) Notice requirements.**

\$1500.00

**WAC 480-30-381 Tariffs and time schedules, filing procedures.  
(2) Transmittal letter.**

\$2500.00

**(c) Rate increase filings.**

Unknown, potentially huge.

**WAC 480-30-391 Tariffs and time schedules, ticket agent agreements must be filed & approved.**

Undeterminable

**WAC 480-30-396 Tariffs and time schedules, free and reduced rates.**

\$500.00

**WAC 480-30-421 Tariffs, general rate increase filings.**

**WAC 480-30-426 Tariffs, general rate increase filings, work papers**

This can be a very expensive process easily running to \$10,000.00+. It is impossible to set any kind of fixed number on this section.

**WAC 480-30-436 Tariffs, special or promotional fare tariff filings**

Cannot fix cost since the potential for a complaint being lodged against the company by the Commission for filing this type of request is very real.

**WAC 480-30-446 Availability of information.**

\$5000.00

**WAC 480-30-461 Service or rate complaints.**

Unknown, we have had no complaints.

**WAC 480-30-471 Ticketing requirements.**

\$10,000.00

**WAC 480-30-476 Baggage liability and claims for loss or damage.**

Cannot be determined as this section is in conflict with RCW and other WAC sections.

**(2) Delivery of checked baggage.**

\$500.00

**(3) Claims.**

\$500.00

pg 5

020497

DATED this 9th day November, 2005

SeaTac Shuttle, LLC

---

Michael Lauver, Vice President

---

John Solin, President