

BREMERTON-KITSAP AIRPORTER, INC.
P.O. Box 1255
Port Orchard, WA 98366

November 11, 2005

Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive, SW
P.O. Box 47250
Olympia, WA 98504-7250

OPPORTUNITY TO RESPOND TO SMALL BUSINESS ECONOMIC IMPACT
STATEMENT (SBEIS) QUESTIONNAIRE.

Dear Ms. Washburn,

The following comments are offered in response to WUTC letter of October 6, 2005 requesting comment relative to subject economic impact of Auto Transportation Company draft rules (Docket number TC-020497) and are submitted on behalf of Bremerton-Kitsap Airporter, Inc. by Richard E. Asche, President.

Name of Company: Bremerton-Kitsap Airporter, Inc.
Contact Person: Richard E. Asche
Telephone: 360-876-1737
No. Employees: 46

Rates and Rate Methodology, Section 7. The entire process of filing for a general rate increase is both time consuming and expensive. The preparation of pro-forma income and expense statements, depreciation schedules and other necessary documentation and justifications is excessive and costly. These burdens are too extensive for the average small business owner who is not an accountant and who doesn't have a full time accountant on his staff. The most recent general rate increase filed by this company took six months of filing and then re-filing again before staff approved an incremental rate increase. If our CPA firm responsible for our official accounting performed this task, the estimated cost for documentation preparation only is \$ 2125.00. (See attached Cox and Lucy, CPA's estimate). Company costs for liaison and follow-up coordination during the entire process are estimated at \$5000-10000, depending on the amount of justification required and the complexity of the request. These costs would be greatly diminished if rate methodology were simplified to allow the operator annual "fare zones" and simplified application procedures as discussed in BKA comments to the proposed rules.

BKA preparation and processing of gasoline surcharge requests are estimated at \$1200.00 per year. If fare zones were implemented, the need for fuel surcharge applications would be eliminated.

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

WAC 480-30-286 Tariffs and time schedules, posting. The requirement to carry in each company vehicle a copy of the operating authority, complete tariff and operating schedule is costly, time consuming and unnecessary. They must be stored in a binder, updated and replaced when vehicles are replaced or when changes are necessary to the three documents. Administration and copying costs are estimated to be \$500.00 per year.

WAC 480-30-231 Vehicle and driver identification. Para.(1) (b). Installation of electronic signage is estimated to cost \$2000.00 per vehicle if extensive modifications to the vehicle are required. If a simple sign is placed in the windshield, a commercially produced sign would cost an estimated \$50.00 each. There are currently 15 vehicles in use. Estimated total cost is \$750- \$30000.00.

WAC 480-30-356 Tariffs and Time Schedules, tariff rules. Para. (3) (i). A taxi from any point on our route to Sea-Tac International Airport cost \$55.00 to \$125.00 per one way trip. The frequency of providing alternate transportation for persons whose reservations were missed cannot be estimated, therefore the cost of this rule cannot be determined.

Sincerely,

Richard E. Asche
President
Bremerton-Kitsap Airporter, Inc

Attachment 1.

Mr. Asche,

You recently asked us to give you a bid for our services to prepare the necessary paperwork the general rate increase filings. I have reviewed the filing requirements and have calculated the following:

- 1.) Prepare pro forma income statement including, restating and pro forma adjustments, passenger count report, and restatement of depreciation schedules to reflect straight-line depreciation and salvage value. Estimated Bid \$1,500

- 2.) We have also determined that some additional time will be needed to field any questions, to provide additional information to the WUTC and aid in the negotiations. We have estimated approximately five hours. Estimated Bid \$625

Thank you for your consideration of Cox & Lucy, CPA's to assist you in this matter. As always we look forward to working you.

Melissa Austin

Cox & Lucy, CPA's