



STATE OF WASHINGTON

## UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

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September 20, 2017

Steven V. King, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
P.O. Box 47250  
Olympia, WA 98504-7250

RE: *Washington Utilities and Transportation Commission v. Exploration Coach Lines LLC*  
Commission Staff's Response to Request for Waiver of Reinstatement Fee  
Docket No. TE-170953

Dear Mr. King:

On September 9, 2017, the Washington Utilities and Transportation Commission (UTC) cancelled Exploration Coach Lines LLC's (Exploration Coach) authority and certificate for failure to maintain proof of insurance. Exploration Coach's authority and certificate was reinstated on September 15, 2017. Also on September 15, 2017, Exploration Coach requested the commission waive the \$200 reinstatement fee and reimburse this amount to its insurance agent.

Below details the sequence of events relating to the cancellation and reinstatement of the certificate:

- July 26 – Commission staff received notice (Form K) from Exploration Coach's insurance company that its insurance would be cancelled on September 6. Commission staff mailed a letter the same day advising Exploration Coach to provide proof of insurance (Form E or temporary binder) by September 6, or the commission will cancel their authority and certificate.
- September 1 – Commission staff emailed Exploration Coach a courtesy reminder to provide proof of insurance by September 6, or the commission will cancel their authority and certificate.
- September 1 - Exploration Coach advised commission staff by email that they contacted their insurance agent and requested that they provide the Commission proof of insurance.

Respect. Professionalism. Integrity. Accountability.

July 20, 2017

Page 2

- September 7 – The Commission did not receive insurance from Exploration Coach.
- September 8 – Commission staff served a letter to Exploration Coach cancelling their authority and certificate due to failure to maintain proof of insurance.
- September 15 – Exploration Northwest's insurance agent submitted a reinstatement application, paid the reinstatement fee and provided proof of insurance. Exploration Coach's authority and certificate was reinstated.

Commission staff does not support waiving the reinstatement fee. Commission staff followed its established procedures throughout the process and does not believe there are extenuating circumstances to consider. Commission staff provided Exploration Coach six weeks advance notice of the deadline and in addition provided a courtesy reminder via email. Exploration Coach timely filed their insurance with the Federal Motor Carrier Safety Administration, yet not to the Commission. Additionally, it is common practice for insurance companies to pay reinstatement fees or reimburse their client if it was their oversight.

If you have any questions, please contact me at 360-664-1224 or by [sstillwe@utc.wa.gov](mailto:sstillwe@utc.wa.gov).

Sincerely,



Suzanne Stillwell  
Licensing Services Manager