

BREMERTON-KITSAP AIRPORTER, INC.
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July 1, 2017

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

Re: Rulemaking to consider Adoption of Rules within WAC 480-30, Relating to Passenger Transportation Companies, Docket TC-161262.

To: Records Center:

The following are comments relative to subject Docket TC-161262. Responses are keyed to the page number shown on the provided proposed rules identified as OTS-8702.7.

WAC 480-30-036 Definitions, General, Page 5- “Flag Stops”.

Early in Bremerton-Kitsap Airporter, Inc. history we were summoned before a WUTC hearing in which it was argued that one of our Service Locations was not situated immediately on our authorized route (SR3), hence it must be treated as a flag stop. Since it was situated at the top of a hill overlooking SR 3, passengers residing at what is now the Baymont Inn in Bremerton would be required to walk down the hill to SR3 and flag down the bus as it was passing by. This argument was denied at the hearing and the matter decided in favor of BKA. Details are available upon request. In this day of nearly instant communications the need for flag stops is no longer necessary and should be stricken from the regulations.

WAC 480-30-056, Records Retention , Page 8, Para 3(E) Customer Service Records.

Subparagraph (E) states that records must be kept for any condition causing the vehicle to deviate from the company’s filed time schedule by more than thirty minutes. For example, traffic backed up at an accident site, inclement weather or equipment failure. Maintenance of this record places an unnecessary burden on all Auto Transportation Companies and serves no useful purpose. If a large number of delays are recorded-then what? Anyone who travels I-5 knows that delays are frequent and constant. A recent road closure of five hours recently occurred at Gorst and a “jumper” closed the Tacoma Narrows Bridge for at least four hours this past week. This records keeping requirement should be abandoned.

WAC 480-30-216 Operation of Motor Vehicles, General, Page 13, Para 8(B) Smoking.

Regarding the necessity of posting “no smoking” signs in all busses is also of questionable value. Imagine entering a bar or restaurant and asking to be seated in the smoking or no smoking section!! It is widely known in Washington State that smoking in nearly all or all public places, including busses is prohibited. Signs are of no value as drivers and perhaps other passengers will willingly police this issue.

WAC 480-30-396 Tariffs and Time Schedules, Free and Reduced Rates, Page 23, paras. (2)-(4).

On occasion, BKA, Inc. offers reduced rates to Military or Navy Reunion Groups holding reunions at Bremerton or JBLM, Charity and Religious Groups and BKA, Inc. employees and members of their immediate families are given free transportation to/from SeaTac Airport. To specify a detailed description of such service, detailed description of the customer class and criteria to qualify, expiration date, applicable rates, amount of the reduction etc. is unnecessary and burdensome for the Auto Transportation Company and all concerned. In view of flexible fares provisions this requirement should be eliminated and RCW 81.28.080 revised or repealed.

Sincerely,

Richard E. Asche

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