

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to examine whether the current procedures for processing applications to obtain or transfer a passenger stage corporation certificate, to acquire or control a passenger stage corporation, and to establish a zone of rate freedom should be revised.

Rulemaking _____

**ORDER INSTITUTING RULEMAKING
REGARDING THE PROCEDURES FOR PROCESSING APPLICATIONS
FOR PASSENGER STAGE CORPORATIONS**

1. Summary

This order institutes a rulemaking to consider simplifying the Commission's existing procedures for granting or denying applications for (1) issuance of a passenger stage corporation (PSC) certificate, (2) authority to transfer a PSC certificate, (3) authority to acquire or control a PSC, or (4) authority to establish a zone of rate freedom. Currently, to obtain one of these certificates a formal application to the Commission in accordance with the Commission's Rules of Practice and Procedure is required. Our examination of these processes is prompted by (1) legislation that modified requirements regarding the issuance and transfer of PSC certificates and (2) our ongoing efforts to minimize regulatory burden.

2. Background

The Commission regulates passenger stage corporations (PSCs) under various provisions of the Public Utilities (Pub. Util.) Code.¹ PSCs are public utilities under the law.² They may operate only after being granted a certificate of public convenience and necessity by the Commission. (Section 1031, et seq.)

Approximately 220 PSCs presently hold an operating certificate. While PSCs once were predominately scheduled, fixed-route bus services, today they are more often on-call, door-to-door airport shuttle services.

Many applicants for PSC authority are small operators who find the current formal application process difficult and time consuming. Some applicants engage an attorney or consultant to prepare the application for them. The process also consumes Commission and staff resources that could be used in more productive ways. At the same time, there is no apparent public benefit to requiring a formal application in view of the recent statutory changes to Section 1032 and the PSC requirements set forth therein.

We advocate streamlining Commission processes whenever possible. Since the requirements to obtain a PSC certificate are straight-forward, the PSC application process is one that lends itself to simplification. We have in mind a process similar to the one used to grant charter-party carrier operating authorities. Applications for charter-party carrier permits and certificates are filed with the staff using a standard application form. These authorities are

¹ All statutory references are to the Public Utilities Code, unless otherwise indicated.

² "Public utility" is defined in Section 216(a) and includes every "common carrier," and the definition of common carrier includes every passenger stage corporation (Section 211(c)).

granted by the Commission's Executive Director, or the Executive Director's designee, under authority that has been formally delegated by the Commission.³

3. Existing Procedures for Applications for a Certificate

Requests for new or the transfer of existing PSC certificates are made by formal application in accordance with the Commission's Rules of Practice and Procedure. In addition to the information required of all formal applications, Rule 3.3(a) requires an application for a new PSC certificate to include the following:

- (1) The type of service being performed by applicant, a general description of it, and a reference to the authority under which existing service is performed.
- (2) The specific authority requested and the particular statutory provision under which the certificate is requested.
- (3) If a carrier of property, a description of specified commodities proposed to be transported, and, if general commodities with exceptions are proposed to be transported, a statement specifying such exceptions.
- (4) The geographical scope of the proposed operation, including the termini and other points proposed to be served, and a concise narrative description of the proposed route.
- (5) A map or sketch of the route and points to be served, drawn to suitable indicated scale, and showing present and proposed operation by distinctive coloring or marking.

³ The authority to grant new charter-party carrier certificates was delegated by Resolution TL-19089, dated June 21, 2007. The authority to transfer charter-party carrier certificates and to issue new charter-party carrier permits was delegated by earlier resolutions.

- (6) A statement of the rates or fares proposed to be charged and rules governing service. Applications for certificates need not contain tariffs, but shall indicate the level and nature of proposed rates and rules and may refer to tariffs on file with or issued by the Commission.
- (7) A statement indicating the frequency of the proposed service. If "on call" service is proposed, the application shall set forth conditions under which such service would be performed.
- (8) The kind and approximate number of units of equipment to be employed in the proposed service.
- (9) A statement of financial ability to render the proposed service.
- (10) Facts showing that the proposed operation is required by public convenience and necessity.

Applicants must provide notice of their applications as prescribed by Rule 3.3(b):

Every applicant for a passenger stage certificate shall forward a copy of the application to each public transit operator operating in any portion of the territory sought to be served by the applicant. The applicant shall also mail a notice that the application has been filed with the Commission to all city and county governmental entities and regional transportation planning agencies within whose boundaries passengers will be loaded or unloaded. This notice shall state in general terms the authority sought, including the proposed routes, schedules, fares and equipment. Said notice shall also state that a copy of the application and related exhibits will be furnished by applicant upon written request. A copy of the notice and a certificate of service shall be filed with the application.

The Commission grants PSC certificates by a formal decision which finds that public convenience and necessity requires the proposed service. Attached to the decision is a certificate that describes the services the carrier is authorized to conduct. Ordering paragraphs of the decision provide that the

applicant may commence service under the certificate only after it has completed a list of requirements, including:

- Filed a tariff and timetable.
- Filed evidence of liability insurance.
- If workers are employed, filed evidence of workers' compensation insurance.
- Enrolled drivers in the DMV pull notice system.
- Complied with the Commission's substance and alcohol testing program.
- Obtained CHP approval of vehicles to be used.

4. Statutory Requirements

As a first step toward streamlining the application process, the Commission recommended that the Legislature revise the statutes under which PSC authorities are issued. The Legislature acted on this recommendation by passing Senate Bill (SB) 1840 (Statutes of 2006, Chapter 694), which became effective January 1, 2007. Among other things, SB 1840 amended Sections 1031 and 1032.

Section 1031 provides that no PSC shall operate without first obtaining from the Commission a certificate declaring that public convenience and necessity requires such operation. Assembly Bill (AB) 1840 added the following paragraph to Section 1031:

(b) For purposes of this section, "public convenience and necessity," as it affects applications for passenger stage corporation certificates, means that the applicant has met the criteria for issuance of a certificate specified in Section 1032.

Section 1032 requires applicants for a PSC certificate to file an application in the form required by the Commission. Previously, the section required the Commission to consider existing PSC service in the proposed

service territory and the impact of the proposed operation on public transit operators before issuing a certificate. AB 1840 eliminated the latter requirements from Section 1032. The section now reads as follows:

(a) Every applicant for a certificate or transfer of a certificate shall file in the office of the commission an application therefore in the form required by the commission. The commission may, with or without a hearing, issue the certificate as requested, or refuse to issue it, or issue it for the partial exercise only of the privilege sought, and may attach to the exercise of the rights granted by the certificate terms and conditions that, in its judgment, are required in the public interest.

(b) (1) Before a certificate is issued or transferred, the commission shall require the applicant to establish reasonable fitness and financial responsibility to initiate and conduct, or continue to conduct, the proposed or existing transportation services. The commission shall not issue or transfer a certificate unless the applicant meets all of the following requirements:

(A) The applicant is financially and organizationally capable of conducting an operation that complies with the rules and regulations of the Department of the California Highway Patrol governing highway safety.

(B) The applicant is committed to observing the hours of service regulations of state and federal law, where applicable, for all persons, whether employees or subcarriers, operating vehicles in transportation for compensation under the certificate.

(C) The applicant has a preventive maintenance program in effect for its vehicles used in transportation for compensation that conforms to regulations of the Department of the California Highway Patrol, as described in Title 13 of the California Code of Regulations.

(D) The applicant participates in a program to regularly check the driving records of all persons, whether employees or subcarriers, operating vehicles used in transportation for compensation requiring a class B driver's license under the certificate.

(E) The applicant has a safety education and training program in effect for all employees or subcarriers operating vehicles used in transportation for compensation.

(F) The applicant agrees to maintain its vehicles used in transportation for compensation in safe operating condition and in compliance with applicable laws and regulations relative to motor vehicle safety.

(G) The applicant has filed with the commission a certificate of workers' compensation insurance coverage or statement required by Section 460.7.

(H) The applicant has provided the commission an address of an office or terminal where documents supporting the factual matters specified in the showings required by this subdivision may be inspected by the commission and the Department of the California Highway Patrol.

(2) With respect to subparagraphs (B) and (F) of paragraph (1), the commission may base its findings on a certification by the commission that an applicant has filed with it a sworn declaration of ability to comply and intent to comply.

(c) In addition to the requirements of subdivision (b), a passenger stage corporation shall meet all other state and federal regulations, where applicable, as prescribed.

(d) The commission may delegate to its executive director or his or her designee, the authority to issue or transfer certificates of public convenience and necessity and to make all necessary findings specified in subdivision (b).

These statutory changes will enable us to move forward in our effort to streamline the PSC application process. They allow us to focus on the issues we believe are paramount in granting passenger carrier operating authorities – insurance and safety standards. We are no longer required to consider how granting a certificate will impact the marketplace. This is a welcome change

since we have long been in favor of competition in ground transportation services.⁴

5. Issues to be Considered Prior to Modifying the Current Process

The requirements listed in Section 1032 now mirror those for charter-party carriers. Additionally, similar to charter-party applications, under Section 1032(d) we will now be able to delegate to the Executive Director or the Executive Director's designee the authority to issue or transfer PSC certificates.

There are a number of issues related to PSC applications, and our regulation of PSCs, that we need to examine in moving to a new application process.

5.1. Service Territory and Points

The majority of the PSC certificates granted in recent times authorize on-call, door-to-door airport shuttle operations. These certificates typically name the airports and counties the carrier is authorized to serve. For instance, a carrier might have authority to provide service between all points in six Bay Area counties, on the one hand, and the area's three major airports, on the other hand. Other certificates authorize service between named points (usually cities), and may include stops at intermediate points along the route of travel. An example would be service between the U.S - Mexico border crossing at San Ysidro and Los Angeles, stopping at Santa Ana. These services are usually provided on a scheduled basis, but occasionally are conducted based on passenger demand (referred to as "on-call" service). We need to examine the issue of what criteria will be used to

⁴ See, for example, the policy discussions in American Buslines, Inc., 3 CPUC2d 246

Footnote continued on next page

delineate PSC service territories or stop points under a streamlined application process.

5.2. Child and Infant Carriers

By Decision 97-07-063 we adopted rules for a niche form of PSC service that specializes in the common carriage of infants and children, and parents, guardians and child-care providers accompanying the children. The rules include special requirements applicants must meet before being granted a certificate:

- Applicants, key personnel, and each driver or other employee in physical contact with the children passengers must be registered in the TrustLine.⁵
- Applicants shall serve a copy of their application on each public pediatric health director, and on the superintendent of each public school district in the proposed service area.
- Applicants shall have a notice of its application published for two consecutive days in a newspaper of general circulation.

These requirements are reasonable under the circumstances. An applicant's compliance can be easily verified. Therefore, we are inclined to continue these requirements as part of a new PSC application process. This is an appropriate time, however, to consider whether any changes are needed.

(1980), and PCSTC, Inc., et al, 6 CPUC3d 628 (2000).

⁵ The TrustLine registry is a screening program of caregivers administered by the state Department of Social Services and the nonprofit California Child Care Resource and Referral Network. Caregivers registered with the TrustLine have been fingerprinted and have cleared a criminal background check by the state Department of Justice.

5.3. Change of Control

Section 854 requires Commission approval to acquire or control any public utility, including a PSC. Currently, approval is requested and granted through the formal application process. Consistent with our PSC streamlining effort, we wish to examine whether these matters should be handled through a simplified process. There is precedent for processing acquisition or control matters informally. For instance, when the Commission regulated highway common carriers and cement carriers as public utilities,⁶ the Executive Director was authorized, absent protest, to approve applications to acquire or control a carrier under Section 854.⁷ In a later action, we authorized PSCs to use the Advice Letter process when seeking approval under Sections 851-854 of certain actions involving the transfer of assets or control where the acquiring entity is already a certified PSC or the parent of a presently certified entity.⁸

5.4. Notice Requirements

Currently, every application the Commission receives for a new PSC certificate or for the transfer of an existing certificate, or for the acquisition or control of a PSC is noticed in the Commission's Daily Calendar. In addition, under Rule 3.3(b), applicants for new PSC authority are required to mail a copy of their application to each public transit operator operating in any portion of the territory sought to be served, and to send a notice of the application to all city

⁶ Responsibility for the regulation of trucking companies, except household goods carriers, was transferred in 1996 to the Department of Motor Vehicles and California Highway Patrol.

⁷ Resolution No. 18204, dated September 6, 1984.

⁸ Resolution TL-18875, dated December 17, 1998.

and county governmental entities and regional transportation planning agencies within whose boundaries passengers will be loaded or unloaded. Although not specifically required by Rule 3.3(b), applicants seeking authority to provide airport service are encouraged to send notice to the involved airport(s).

Applicants for on-call, door-to-door airport shuttle authority regularly request a waiver from the requirement to serve notice to every city in the service territory. We have been amenable to granting these requests because having to serve dozens of cities is burdensome and because on-call, door-to-door PSC service does not involve fixed stops (which under some city rules might require an approval process). Rather, passengers will simply be picked up or dropped off at their choice of residence, place of business, or lodging facility. We need to look at what notice requirements, if any, should exist under a simplified application process.

Related to the notice issue, we need to determine under what circumstances the Commission will entertain a protest to a PSC application, the manner in which a protest must be filed, and how a protest will be resolved. Currently, a protest to a formal application is governed by Rule 2.6.

5.5. Tariff Fares

As public utilities, PSCs are required to charge rates that are just and reasonable. (Section 451.) As common carriers, PSCs file tariff schedules with the Commission containing their rates, fares, and charges for transportation between points in the state. (Section 486 et seq.) They may not, as to rates, charges, services, or facilities, grant any preference or advantage to any person or subject any person to prejudice or disadvantage. (Section 453.) Rates may be changed only upon approval of the Commission. (Section 454.) The Commission may establish a zone of rate freedom (ZORF) that allows a PSC

operating in competition with other passenger transportation services to adjust its fares within an authorized range without further approval of the Commission. Section 454.2 states:

Notwithstanding Section 454, the Commission may establish a “zone of rate freedom” for any passenger stage transportation service which is operating in competition with other passenger transportation service from any means of transportation, if the competition together will the authorized zone of rate freedom will result in reasonable rates and charges for the passenger stage transportation service. An adjustment in rates or charges within a zone of rate freedom established by the Commission is hereby deemed just and reasonable. The Commission may, upon protest or on its own motion, suspend any adjustment in rates or charges under this section and institute proceedings under its rules of practice and procedure.

Most applicants for a PSC certificate include a request to establish a ZORF in their application. The carriers commonly will operate in competition with other PSCs, charter-party carriers, taxicabs, and private automobiles, and oftentimes public transit. Such a highly competitive environment should result in the carrier pricing its services at a reasonable level. Therefore, we generally grant the request for a ZORF. Some are based on a percentage, for example, 20% above and below the initial fares. More common, however, are ZORFs based on a dollar amount, such as \$15 above and below the proposed fares.

We need to examine whether the current method of granting ZORFs should also be modified. Our streamlining goals will not be fully accomplished if applicants for PSC authority must still go through the formal application process to obtain a ZORF. We will consider if delegation of authority is possible, should the Commission establish a standard ZORF that applies to all carriers,

perhaps based on a percentage, or should ZORFs continue to vary in recognition that PSCs do not all operate in equally competitive markets?

6. Preliminary Scoping Memo

The scope of this proceeding is to consider changes to the manner in which the Commission:

- grants applications for a PSC certificate
- authorizes the transfer of a PSC certificate
- grants permission to acquire or control a PSC
- authorizes a PSC to establish a ZORF.

In order to provide the Commission with insight and information, we invite interested parties to file comments to all or any of the following:

1. Under a simplified application process, what criteria should the Commission use to prescribe territories, airports, and other specific points to be served in a PSC certificate?
2. Are any changes to the requirements to operate a PSC service specializing in the transportation of children and infants necessary?
3. Should the Commission establish a simplified process for granting approval to acquire or control a PSC pursuant to Section 854?
4. Should an applicant for PSC authority be required to serve notice of its application to any parties?
5. Under what circumstances, if any, should a protest to a PSC application be entertained, and how should it be resolved?
6. How should the concerns of a public transit operator be addressed when a PSC applicant intends to operate over the same or a similar route, possibly using the same stops, as the public operator?
7. Should a city, or a county in the case of an unincorporated community, be afforded an opportunity to object to the grant of PSC authority, in whole or in part, due to concerns over proposed stop points, traffic congestion, or other safety related issues?

8. Should the current formal application process used to grant a ZORF be revised?
9. What, if any, amendments to the Rules of Practice and Procedure are required to implement any changes to the application process?

Pursuant to Rule 7.1(d), this rulemaking is preliminarily determined to be quasi-legislative, as that term is defined in Rule 1.3(d). We may conduct workshops if it appears they are needed to clarify proposals or issues, or to promote the exchange of ideas. We do not anticipate a need for evidentiary hearings.

The preliminary schedule for the filing of opening and reply comments in this rulemaking is as follows:

Opening Comments	45 days after OIR issued
Reply Comments	21 days after opening comments

The assigned Commissioner or assigned Administrative Law Judge (ALJ) may modify the schedule as necessary. We anticipate this proceeding will be completed within 18 months.

As required by Rule 6.2, any party filing responsive comments shall include in the comments any objections to (i) categorization of this proceeding as quasi-legislative; (ii) the determination that there is no need for hearings; or (iii) the preliminary scope and timetable for this proceeding. Any party who believes that a hearing is required must, in its response, identify and describe (1) material issues of fact and (2) the evidence the party proposes to introduce at the requested hearing. Any right that a party may otherwise have to a hearing will be waived if the party does not submit such information in its response.

If the proposed decision in this proceeding recommends amendments to the Rules of Practice and Procedure, the Chief Administrative Law Judge will submit the proposed amendments to the Office of Administrative Law for

review and publication in the California Code of Regulations pursuant to Pub. Util. Code § 311(h). This publication starts the 45-day notice and comment period, which is the first stage leading to the adoption and codification (in the California Code of Regulations) of the proposed amendments to the Rules of Practice and Procedure. For purposes of such publication, the Chief Administrative Law Judge is authorized to propose nonsubstantive changes to the draft whenever such nonsubstantive change will improve the clarity or consistency of the rule. The time for comment on the proposed decision pursuant to Pub. Util. Code § 311 will be extended to accommodate the requirements of Government Code §§ 11346.4 and 113251, and California Code of Regulations, Title 1, §§ 1-120, as follows:

Opening comments on PD	45 days after publication
Reply comments on PD	5 days after date of opening comments

7. Becoming a Party; Joining and Using the Service List

The Executive Director shall serve a copy of this order on every holder of a PSC certificate, on the attorneys and consultants listed on Attachment A who are known by the Consumer Protection and Safety Division to file applications for PSC certificates with the Commission, and on the airports listed in Attachment B.

The following procedures regarding party status and inclusion on the service list shall be followed. While all holders of a PSC certificate may be bound by the outcome of this proceeding, only those who notify us that they wish to be on the service list will be accorded service by others until final rules are proposed and/or a final decision issued.

We invite broad participation in this proceeding. If you want to participate in the Rulemaking or simply to monitor it, follow the procedures set forth below. To ensure you receive all documents, send your request within 30

days after the Order Instituting Rulemaking (OIR) is published. The Commission's Process Office will publish the official service list at the Commission's website (www.cpuc.ca.gov), and will update the list as necessary.

7.1. During the First 30 days

Within 30 days of the publication of this OIR, any person may ask to be added to the official service list. Send your request to the Process Office. You may use e-mail (Process_Office@cpuc.ca.gov) or letter (Process Office, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, CA 94102).

Include the following information:

- Docket Number of this Rulemaking;
- Name (and party represented, if applicable);
- Postal Address;
- Telephone Number;
- E-mail Address; and
- Desired Status (Party, State Service, or Information Only).⁹

If the OIR names you as respondent, you are already a party, but you or your representative must still ask to be added to the official service list.

7.2. After the First 30 Days

If you want to become a party after the first 30 days, you may do so by filing and serving timely comments in the Rulemaking [Rule 1.4(a)(2)], or by making an oral motion [Rule 1.4(a)(3)], or by filing a motion [Rule 1.4(a)(4)]. If you file a motion, you must also comply with Rule 1.4(b). These rules are in the

⁹ If you want to file comments or otherwise actively participate, choose "Party" status. If you do not want to actively participate but want to follow events and filings as they occur, choose "State Service" status if you are an employee of the State of California; otherwise, choose "Information Only" status.

Commission's Rules of Practice and Procedure, which you can read at the Commission's website.

If you want to be added to the official service list as a non-party (that is, as State Service or Information Only), follow the instructions in section 7.1 above.

7.3. Updating Information

Once you are on the official service list, you must ensure that the information you have provided is up-to-date. To change your postal address, telephone number, e-mail address, or the name of your representative, send the change to the Process Office by letter or e-mail, and send a copy to everyone on the official service list.

7.4. Serving and Filing Documents

We anticipate that the Process Office will publish the official service list before the first filing deadline in this Rulemaking. When you serve a document, use the official service list published at the Commission's website as of the date of service. You must comply with Rules 1.9 and 1.10 when you serve a document to be filed with the Commission's Docket Office. If you are a party to this Rulemaking, you must serve by e-mail any person (whether Party, State Service, or Information Only) on the official service list who has provided an e-mail address.

The Commission encourages electronic filing and e-mail service in this Rulemaking. You may find information about electronic filing at <http://www.cpuc.ca.gov/PUC/efiling>. E-mail service is governed by Rule 1.10. If you use e-mail service, you must also provide a paper copy to the assigned Commissioner and ALJ. The electronic copy should be in Microsoft Word or Excel formats to the extent possible. The paper copy should be double-sided.

E-mail service of documents [should] [must] occur no later than 5:00 p.m. on the date that service is scheduled to occur.

If you have questions about the Commission's filing and service procedures, contact the Docket Office.

8. Public Advisor

Any person or entity interested in participating in this rulemaking as a party and who is unfamiliar with the Commission's procedures should contact the Commission Public Advisor's Office in San Francisco at (415) 703-2074 or (866) 849-8390, or e-mail public.advisor@cpuc.ca.gov. Assistance is also available in Los Angeles at (213) 576-7055 or (866)849-8391, or e-mail public.advisor.la@cpuc.ca.gov. The TYY number for both offices is (866) 836-7825.

9. Ex Parte Communications

Pursuant to Rules 6.3(e) and 8.2(a), ex parte communications are allowed in this proceeding without any restrictions or reporting requirements.

IT IS ORDERED that:

1. A rulemaking is instituted on the Commission's own motion to examine whether the procedures for obtaining or transferring a passenger stage corporation certificate (PSC), securing approval to acquire or control a PSC, and the granting of authority to establish a zone of rate freedom should be revised.
2. The Executive Director will cause this Order Instituting Rulemaking to be served on every PSC holding a certificate from the Commission, the attorneys and consultants listed on Attachment A, and the airports listed on Attachment B.
3. The Commission's Process Office will publish the official service list on the Commission's website (www.cpuc.ca.gov) as soon as practicable.

4. Parties may also obtain the official service list by contacting the Process Office at (415) 703-2021.

5. Interested persons must follow the directions in Section 7 of this Order Instituting Rulemaking to become a party or to be placed on the official service list as a non-party.

6. The Assigned Commissioner or the Assigned Administrative Law Judge will have on-going oversight of the service list and may institute changes to the list or the rules governing it, as needed.

7. Parties serving documents in this proceeding must comply with Rule 1.10 of the Commission's Rules of Practice and Procedure regarding electronic mail (e-mail) service. Parties providing e-mail service must also provide a paper copy to the assigned Commissioner and Administrative Law Judge.

8. Interested parties shall file and serve their comments to this rulemaking no later than 45 days after this rulemaking is issued, and reply comments no later than 21 days after opening comments are due, unless otherwise directed by the Commission, the Assigned Commissioner, or the assigned Administrative Law Judge, in accordance with the Commission's Rules of Practice and Procedure.

9. The category of this rulemaking is preliminarily determined to be "quasi-legislative" as that term is defined in Rule 1.3(d) of the Commission's Rules of Practice and Procedure.

10. As required in Rule 6(c)(2), any person filing responsive comments shall include in the comments any objections to (i) categorization of this proceeding as quasi-legislative; (ii) the determination that there is no need for hearings; or (iii) the preliminary scope and timetable for this proceeding.

11. The Assigned Commissioner and the assigned Administrative Law Judge may issue further rulings concerning the schedule and management of this proceeding.

This order is effective today.

Dated _____, at San Francisco, California.

ATTACHMENT A

<p>William D. Taylor Attorney at Law HANSON BRIDGETT LLP 500 Capitol Mall, Suite 1500 Sacramento, CA 95814</p>	<p>John E. deBrauwere Attorney at Law 27019 Helmond Drive Calabasas, CA 91301</p>
<p>Daniel W. Baker Attorney at Law 3643 Baker Lane Lafayette, CA 94549</p>	<p>Kirk Van Houten Production & Compliance Services, Inc. P.O. Box 19336 Encino, CA 91416-9336</p>
<p>Jose E. Guzman, Jr. Attorney at Law NOSSAMAN LLP 50 California Street, 34th Floor San Francisco, CA 94111</p>	<p>Arnold A. Lewin Southwest Traffic Service 1166 Wotan Drive Encinitas, CA 92024-2298</p>
<p>Thomas J. MacBride, Jr. Attorney at Law GOODIN, MacBRIDE, SQUERI, DAY & LAMPREY, LLP 505 Sansome Street, Suite 900 San Francisco, CA 94111</p>	<p>M. Ebi Esule Transportation Information Center P.O. Box 1789 Hollywood, CA 90078-1789</p>
<p>Ronald C. Chauvel Attorney at Law Greene, Chauvel, Descalso & Minoletti 155 Bovet Road, Suite 780 San Mateo, CA 94402</p>	<p>R.J. Simmons 3871 Piedmont Ave. #314 Oakland, CA 94611</p>

<p>Daniel K. Gaston Attorney at Law Larson & Gaston, LLP 200 S. Los Robles Ave., Suite 530 Pasadena, CA 91101</p>	<p>Ed Gasaway 3505 Camino Del Rio South, Suite 208 San Diego, CA 92108</p>
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(END OF ATTACHMENT A)

ATTACHMENT B

Arcata/Eureka Airport Attn: Ground Transportation Dept. 3561 Boeing Ave. McKinleyville, CA	Ontario International Airport Attn: Ground Transportation Dept. 1940 East Moore Way, Room 200 Ontario, CA 91761
Meadows Field Attn: Ground Transportation Dept. 3701 Wings Way, Suite 300 Bakersfield, CA 93308	Oxnard Airport Attn: Ground Transportation Dept. 2889 W. Fifth Street Oxnard, CA 93030
Bob Hope Airport Attn: Ground Transportation Dept. 2627 N. Hollywood Way Burbank, CA 91505	Palm Springs International Airport Attn: Ground Transportation Dept. 3400 E. Tahquitz Canyon Way, Suite OFC Palm Springs, CA 92262
McClellan-Palomar Airport Attn: Ground Transportation Dept. 2192 Palomar Airport Road Carlsbad, CA 92011	Redding Municipal Airport Attn: Ground Transportation Dept. 6751 Woodrum Circle, Suite 200 Redding, CA 96002
Chico Municipal Airport Attn: Ground Transportation Dept. P.O. Box 3420 Chico, CA 95927	Sacramento International Airport Attn: Ground Transportation Dept. 6900 Airport Blvd. Sacramento, CA 95837
Del Norte County Airport Attn: Ground Transportation Dept. 981 H Street, Suite 110 Crescent City, CA 95531	San Diego International Airport Attn: Ground Transportation Dept. P.O. Box 82776 San Diego, CA 92138-2776
Fresno Yosemite International Airport Attn: Ground Transportation Dept. 4995 E. Clinton Way Fresno, CA 93727	San Francisco International Airport Attn: Ground Transportation Dept. P.O. Box 8097 San Francisco, CA 94128-9097

Imperial County Airport Attn: Ground Transportation Dept. 1099 Airport Road Imperial, CA 92251	San Jose International Airport Attn: Ground Transportation Dept. 1732 N. First Street #600 San Jose, CA 95112
Inyokern Airport Attn: Ground Transportation Dept. 1669 Airport Road Inyokern, CA 93527	San Luis Obispo County Regional Airport Attn: Ground Transportation Dept. 903-5 Airport Drive San Luis Obispo, CA 93401
Long Beach Airport Attn: Ground Transportation Dept. 4100 Donald Douglas Drive Long Beach, CA 90808-1798	John Wayne Airport Attn: Ground Transportation Dept. 3160 Airway Ave. Costa Mesa, CA 92626
Los Angeles International Airport Attn: Ground Transportation Dept. P.O. Box 92216 Los Angeles, CA 90009-2216	Santa Barbara Municipal Airport Attn: Ground Transportation Dept. 500 Fowler Road Santa Barbara, CA 93117
Merced Regional Airport Attn: Ground Transportation Dept. 20 Macready Drive Merced, CA 95341	Santa Maria Public Airport Attn: Ground Transportation Dept. 3217 Terminal Drive Santa Maria, CA 93455
Modesto City-County Airport Attn: Ground Transportation Dept. 617 Airport Way Modesto, CA 95354	Sonoma County Airport Attn: Ground Transportation Dept. 2290 Airport Blvd. Santa Rosa, CA 95403
Monterey Peninsula Airport Attn: Ground Transportation Dept. 200 Fred Kane Drive #200 Monterey, CA 93940	Stockton Metropolitan Airport Attn: Ground Transportation Dept. 500 S. Airport Way, Room 202 Stockton, CA 95206

<p>Oakland International Airport Attn: Ground Transportation Dept. 1 Airport Drive Oakland, CA 94621</p>	<p>Visalia Municipal Airport Attn: Ground Transportation Dept. 9501 Airport Drive Visalia, CA 93277</p>
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(END OF ATTACHMENT B)