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PUBLIC UTILITIES COMMISSION OF OHIO

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PUCO

IN THE MATTER OF THE ADOPTION OF
RULES RELATED TO RATES FOR TOWING
AND STORAGE OF MOTOR VEHICLES

CASE NO.: 17-713-TR-ORD

COMMENTS OF TOWING AND RECOVERING ASSOCIATION OF OHIO (TRAO)

I. INTRODUCTION

(¶1) As attorney for the Towing and Recovery Association of Ohio (TRAO), I would like to thank you for the opportunity to offer comment in this case. TRAO is the largest and oldest towing association in the State of Ohio. Its hardworking members are over 200 strong and come from every area of the State. They do much to promote the free flow of transportation and commerce while also doing their part to insure the safety of each of the roadways and communities throughout the State. TRAO is an affiliate of the National Association TRAA and its current President Vaughn Gobel from the Youngstown area is also 2nd V.P. of the National Association.

II. RECONSIDERATION OF TOWING AND STORAGE FEES SET FORTH IN THE ORIGINAL ENTRY

(¶2) TRAO requests that the Commission increase the proposed new rates to reflect the business associated costs that have risen at a rate far greater than the CPI has risen since 2000. Equipment costs, insurance costs, and all costs associated with the additional regulatory requirements have added to the costs of performing this important service for the safety and welfare of the citizens of their state. With all of such costs it is extremely difficult, if not impossible, to quantify but, there is no denying their reality.

(¶3) However there are two (2) costs that can be quantified across the board. The first is the cost of the necessary equipment itself. Based on a survey of members as well as a review of manufacturers costs sheets, it is fair to say that the cost of equipment has increased by 100% over the cost in June of 2000. This is far greater than the approximate 40% CPI index increase. The other quantifiable costs is liability insurance. Again, the increase since June of 2000 is substantial, reflecting a 75% increase, which is again far in excess of the CPI increase.

III. COLUMBUS COMPARISON

(¶4) The City of Columbus (muni code 2107.06) last increased impound fees (towing costs) and storage charges in 2008. After thorough study of the issue the fair

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and reasonable fees determined by the City of Columbus are remarkably close to those under consideration by this Board - But they were established ten (10) years ago. For example, a vehicle 7,000 pounds and under is subject to a towing charge of \$125.00 and a storage charge of \$18.00 per hour. Columbus has a number of levels based on the weight of the towed/stored vehicle, which leads to a charge of \$280.00 for a vehicle above 14,999 pounds. This is significantly higher than the \$212.00 which would be applicable to vehicles in that weight class under the proposed PUCO rates. Now, TRAO is not suggesting that the Columbus rates should be dispositive of their issue. But it would certainly seem a fair and reasonable approach to incorporate the rates set in 2008 and apply the CPI increase to those numbers for the last ten (10) years. After all, the Board would merely be considering a very neighboring jurisdiction which has a history of seriously studying these issues.

IV. CONCLUSION

(15) For these reasons, the Commission should reconsider the rate increase issue set forth in the original entry. This is especially needed since there has not been an increase for seventeen (17) years and that loss can never be recovered.

Respectively Submitted,

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