FILE

09-223-TR-OR)

From: vwfamily@roadrunner.com

To: ContactThePUCO Subject: It's about time!

Received: 3/17/2011 6:00:30 PM

Message:

Dear PUCO, I'm glad to see the listening sessions had some effect on your recent rules for 10,001 to 26,000 vehicles. Next time, perhaps you should have the listening sessions BEFORE you enact all the rules and start enforcing them and cause panic in a segment of the population already having a hard time staying in business without wasteful and senseless regulations. I'm also glad that Gov. Kasich may have had a hand in getting the PUCO to be REASONABLE. And lastly, thanks to the other branches of Government for proposing HB 82 that would have corrected this potential injustice. All in all it seems like a monumental waste of my money over the last year (IE: my money = The poor taxpayer). Attached is a cost estimate/breakdown I just completed. Please include it in your review and discussion sessions. Thanks, Dan Van Wagnen Ohio Resident Previous Business Owner Concerned Business Manager Supporter of HB 5

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## PUCO 10,001 to 26,000 rules - Cost Breakdown

## Based on very conservative estimates 3/16/11

Our employees are Electricians by trade. Only 20% of the time we utilize the 4 vehicles in our fleet that fit into the 10,001 to 26,000# rule category

## **Assumptions**

Office \$15 hr plus burden = \$21.00 Employee \$18 hr plus burden = \$24.30 Mechanic \$20 hr plus burden = \$27.00 Supervisor/Owner - \$30 hr plus burden = \$40.50 Revenue per hour, Employee \$55.00 Revenue per hour, Supervisor/owner \$85.00 Work Days available - 244 (20% = 49 days) (260 less 6 holidays, less 5 sick/personal, less 5 vacation)

Maximum actual time driving vehicles - 1 hour per day

4 vehicles 10,001 to 26,000 in fleet used 20% of time

2010 7 057 miles / 4 vehicles 4 004 aver miles and vehicles

2010 - 7,857 miles / 4 vehicle = 1,964 avg miles per vehicle

or 40.09 miles per vehicle/per day used 6 potential drivers needed 20% of time

**One-Time Expenses** 

| Vehicle 1 - lettering                                | \$       | 200.00 |
|--|----------|--------|
| Vehicle 2 - lettering                                | \$       | 200.00 |
| Vehicle 3 - lettering                                | \$       | 200.00 |
| Vehicle 4 - lettering                                | \$       | 200.00 |
| <b>Q</b>   |          |        |
| Employent Application - Modification (1 hour Office) | \$       | 21.00  |
|  |          |        |
| Driver 1   |          |        |
| Driving Test (1/2 Hour employee)                     | \$       | 12.15  |
| Driving Test (3/4 Hour Supervisor/owner)             | \$       | 30.38  |
| Lost Revenue (1/2 Hour employee)                     | \$       | 27.50  |
| Lost Revenue (3/4 Hour Supervisor/owner)             | \$       | 63.75  |
|  |          |        |
| Driver 2   |          |        |
| Driving Test (1/2 Hour employee)                     | \$       | 12.15  |
| Driving Test (3/4 Hour Supervisor/owner)             | \$       | 30.38  |
| Lost Revenue (1/2 Hour employee)                     | \$       | 27.50  |
| Lost Revenue (3/4 Hour Supervisor/owner)             | \$       | 63.75  |
|  |          |        |
| Driver 3   |          |        |
| Driving Test (1/2 Hour employee)                     | \$       | 12.15  |
| Driving Test (3/4 Hour Supervisor/owner)             | \$<br>\$ | 30.38  |
| Lost Revenue (1/2 Hour employee)                     | \$       | 27.50  |
| Lost Revenue (3/4 Hour Supervisor/owner)             | \$       | 63.75  |
|  |          |        |
| Driver 4   |          |        |
| Driving Test (1/2 Hour employee)                     | \$       | 12.15  |
| Driving Test (3/4 Hour Supervisor/owner)             | \$       | 30.38  |
| Lost Revenue (1/2 Hour employee)                     | \$       | 27.50  |

| Lost Revenue (3/4 Hour Supervisor/owner)  | \$             | 63.75                            |                                       |
|---|----------------|----------------------------------|---------------------------------------|
| Driver 5 Driving Test (1/2 Hour employee) Driving Test (3/4 Hour Supervisor/owner) Lost Revenue (1/2 Hour employee) Lost Revenue (3/4 Hour Supervisor/owner)                                  | \$ \$ \$ \$    | 12.15<br>30.38<br>27.50<br>63.75 |                                       |
| Driver 6 Driving Test (1/2 Hour employee) Driving Test (3/4 Hour Supervisor/owner) Lost Revenue (1/2 Hour employee) Lost Revenue (3/4 Hour Supervisor/owner)                                  | \$<br>\$<br>\$ | 12.15<br>30.38<br>27.50<br>63.75 |                                       |
| One-Time cost to comply   | \$             | 1,623.68                         |                                       |
| Annual Expenses  Driver 1 . Physical Cost (\$100 / 2 years)   | \$             | 50.00                            |                                       |
| Physical Time (3 hours employee / 2 years) Physical Lost Revenue (3 hours employee / 2 years) Daily Pre/Post trip inspections/logs/documentation (20% of time: 49 days, 1/2 hour Employee)    | \$<br>\$<br>\$ | 36.45<br>82.50<br>595.35         |                                       |
| Daily Pre/Post trip Inspection - lost revenue (20% of time: 49 days, 1/2 hour Employee)   | \$             | 1,347.50                         |                                       |
| Physical Cost (\$100 / 2 years) Physical Time (3 hours employee / 2 years) Physical Lost Revenue (3 hours employee / 2 years) Daily Pre/Post trip inspections/logs/documentation              | \$<br>\$       | 50.00<br>36.45<br>82.50          | · :                                   |
| (20% of time: 49 days, 1/2 hour Employee) Daily Pre/Post trip Inspection - lost revenue (20% of time: 49 days, 1/2 hour Employee)   | \$<br>\$       | 595.35<br>1,347.50               | • • • • • • • • • • • • • • • • • • • |
| Driver 3 Physical Cost (\$100 / 2 years) Physical Time (3 hours employee / 2 years) Physical Lost Revenue (3 hours employee / 2 years) Daily Pre/Post trip inspections/logs/documentation     | \$<br>\$       | 50.00<br>36.45<br>82.50          | ;<br>;                                |
| (20% of time: 49 days, 1/2 hour Employee) Daily Pre/Post trip Inspection - lost revenue (20% of time: 49 days, 1/2 hour Employee)   | \$<br>\$       | 595.35<br>1,347.50               |                                       |
| Driver 4  Physical Cost (\$100 / 2 years)  Physical Time (3 hours employee / 2 years)  Physical Lost Revenue (3 hours employee / 2 years)  Daily Pre/Post trip inspections/logs/documentation | \$<br>\$       | 50.00<br>36.45<br>82.50          |                                       |
| (20% of time: 49 days, 1/2 hour Employee)   | \$             | 595.35                           | 1                                     |

| Daily Pre/Post trip Inspection - lost revenue<br>(20% of time: 49 days, 1/2 hour Employee)   | \$                             | 1,347.50                                      |
|--|--------------------------------|---|
| Driver 5   |                                |   |
| Physical Cost (\$100 / 2 years)  | \$                             | 50.00   |
| Physical Time (3 hours employee / 2 years)   | \$                             | 36.45   |
| Physical Lost Revenue (3 hours employee / 2 years)   | \$                             | 82.50   |
| Driver 6   |                                |   |
| Physical Cost (\$100 / 2 years)  | \$                             | 50.00   |
| Physical Time (3 hours employee / 2 years)   | \$                             | 36.45   |
| Physical Lost Revenue (3 hours employee / 2 years)   | \$                             | 82.50   |
| Vehicle 1 - Annual Inspection (1 hour Mechanic)  | \$                             | 27.00   |
| Vehicle 2 - Annual Inspection (1 hour Mechanic)  | \$                             | 27.00   |
| Vehicle 3 - Annual Inspection (1 hour Mechanic)  | \$                             | 27.00   |
| Vehicle 4 - Annual Inspection (1 hour Mechanic)  | \$                             | 27.00   |
| Annual Inspection documentation (1 hour office)  | \$                             | 21.00   |
| Accident Register, maintain (1 hour office)  | \$                             | 21.00   |
| Misc Documenting, copies, updates, reviews (3 hours office)  | \$                             | 63.00   |
|  |                                |   |
| Annual Cost to comply  | \$                             | 8,998.10                                      |
|  |                                |   |
| 1st year total cost to comply  |                                | 8,998.10<br>10,621.78<br>1.35                 |
|  | \$                             | 10,621.78                                     |
| 1st year total cost to comply 1st year cost to comply per mile driven (7,857) Subsequent years cost to comply per mile driven (7,857)  | \$<br>\$                       | 10,621.78<br>1.35                             |
| 1st year total cost to comply<br>1st year cost to comply per mile driven (7,857)   | \$<br>\$                       | 10,621.78<br>1.35                             |
| 1st year total cost to comply 1st year cost to comply per mile driven (7,857) Subsequent years cost to comply per mile driven (7,857)  Does not include:  Maintenance and repair costs -   | \$<br>\$                       | 10,621.78<br>1.35                             |
| 1st year total cost to comply 1st year cost to comply per mile driven (7,857) Subsequent years cost to comply per mile driven (7,857)  Does not include:   | \$<br>\$                       | 10,621.78<br>1.35                             |
| 1st year total cost to comply 1st year cost to comply per mile driven (7,857) Subsequent years cost to comply per mile driven (7,857)  Does not include:  Maintenance and repair costs - Part of business, need to maintain equipment to stay in business  | \$ \$ \$                       | 10,621.78<br>1.35                             |
| 1st year total cost to comply 1st year cost to comply per mile driven (7,857) Subsequent years cost to comply per mile driven (7,857)  Does not include:  Maintenance and repair costs -   | \$ \$ \$                       | 10,621.78<br>1.35                             |
| 1st year total cost to comply 1st year cost to comply per mile driven (7,857) Subsequent years cost to comply per mile driven (7,857)  Does not include:  Maintenance and repair costs - Part of business, need to maintain equipment to stay in business  Employee Driving background checks - Part of business, insurance requirement  | \$<br>\$<br>\$                 | 10,621.78<br>1.35<br>1.15                     |
| 1st year total cost to comply 1st year cost to comply per mile driven (7,857) Subsequent years cost to comply per mile driven (7,857)  Does not include:  Maintenance and repair costs - Part of business, need to maintain equipment to stay in business  Employee Driving background checks - Part of business, insurance requirement  Employee quits/fired - loss of investment (costs from above)  | \$<br>\$<br>\$                 | 10,621.78<br>1.35<br>1.15                     |
| 1st year total cost to comply 1st year cost to comply per mile driven (7,857) Subsequent years cost to comply per mile driven (7,857)  Does not include:  Maintenance and repair costs - Part of business, need to maintain equipment to stay in business  Employee Driving background checks - Part of business, insurance requirement  | \$<br>\$<br>\$                 | 10,621.78<br>1.35<br>1.15<br>487.43<br>487.43 |
| 1st year total cost to comply 1st year cost to comply per mile driven (7,857) Subsequent years cost to comply per mile driven (7,857)  Does not include:  Maintenance and repair costs - Part of business, need to maintain equipment to stay in business  Employee Driving background checks - Part of business, insurance requirement  Employee quits/fired - loss of investment (costs from above) New Hire Driving check/physical investment (costs from above) New Hire background checking/documentations  | <b>\$\$\$</b> \$\$\$\$\$\$\$\$ | 10,621.78<br>1.35<br>1.15<br>487.43<br>487.43 |
| 1st year total cost to comply 1st year cost to comply per mile driven (7,857) Subsequent years cost to comply per mile driven (7,857)  Does not include:  Maintenance and repair costs - Part of business, need to maintain equipment to stay in business  Employee Driving background checks - Part of business, insurance requirement  Employee quits/fired - loss of investment (costs from above) New Hire Driving check/physical investment (costs from above) New Hire background checking/documentations  Possible PUCO roadside inspection(s):   | \$ \$ \$ \$ \$ ??              | 10,621.78<br>1.35<br>1.15<br>487.43<br>487.43 |
| 1st year total cost to comply 1st year cost to comply per mile driven (7,857) Subsequent years cost to comply per mile driven (7,857)  Does not include:  Maintenance and repair costs - Part of business, need to maintain equipment to stay in business  Employee Driving background checks - Part of business, insurance requirement  Employee quits/fired - loss of investment (costs from above) New Hire Driving check/physical investment (costs from above) New Hire background checking/documentations  | <b>\$\$\$</b> \$\$\$\$\$\$\$\$ | 10,621.78<br>1.35<br>1.15<br>487.43<br>487.43 |
| 1st year total cost to comply 1st year cost to comply per mile driven (7,857) Subsequent years cost to comply per mile driven (7,857)  Does not include:  Maintenance and repair costs - Part of business, need to maintain equipment to stay in business  Employee Driving background checks - Part of business, insurance requirement  Employee quits/fired - loss of investment (costs from above) New Hire Driving check/physical investment (costs from above) New Hire background checking/documentations  Possible PUCO roadside inspection(s): Loss of time, loss of revenue, more documentation, fines, etc | \$ \$ \$ \$ \$ ??              | 10,621.78<br>1.35<br>1.15                     |