

## **HOTEL TRANSPORTATION COALITION - METRO DC AIRPORTS**

Petition Target: Metropolitan Washington Airports Authority

Sponsored by: Hotel Transportation Coalition

As hotel owners, operators and members of the Hotel Transportation Coalition, **this petition seeks to have the Metropolitan Washington Airports Authority (MWAA) TABLE any action on its Regulation 606 drafted on February 8, 2009.**

The HTC recognizes the MWAA's legitimate concerns including traffic flow, airport congestion, and sustainability. It is our desire to work collaboratively with the MWAA to address its concerns.

A specific action imbedded in Regulation 606 is the proposal to impose significant additional fees on the hotel community for operating our courtesy shuttles. **We strongly oppose the proposal for the following reasons:**

- Travelers are already assessed a wide variety of add-on charges (e.g. Airport Fees, TOT, Car Rental Tax). Unlike Washington Flyer taxis, hotels are unable to pass-along any access fee to its courtesy shuttle users as the FREE courtesy shuttle service is a requirement for an overwhelming majority of the hotels.
- Our reading of the assumptions used to develop the basis for determining the access fee (presented in Regulation 606 at \$2.50 per trip) indicates that the estimate of daily trips is woefully underestimated. By working with HTC, the MWAA can better develop such assumptions as the number of daily trips by hotel courtesy shuttles.
- Given the foregoing problem with MWAA's daily trip estimate coupled with a lack of support for a \$2.50 Per-Trip Fee assessment from MWAA's own work shown on Attachment I of Regulation 606, more study is required before imposing this burden on the hotel business community.
- The proposal does not provide critical details (examples include: a. who will shoulder the added cost to outfit Automatic Vehicle Identification equipment or b. how trip credits for airline crews will be handled/accounted).
- HTC's membership already absorbs a substantial cost burden (in the millions of dollars annually) just to provide a necessary service that in-and-of-itself benefits the MWAA airports. We note for the record, MWAA affords no coordinated alternative to the hotel community for airport travelers seeking hotel accommodations.
- As one of the most taxed business enterprises, the existing cost burden on hotels is already at a tipping point. Exacerbating our high tax burden is the fact that the current market conditions have turned very unfavorable for absorbing additional expenses. Meanwhile, a significant number of hotels are not meeting their mortgage

requirements and this not only jeopardizes the going-concern but will hurt our financial and banking system.

- Although “environmental sustainability” is a stated objective of the new regulation, this proposal does little to address such concerns. To the contrary, the HTC believes the proposal has greater potential to hurt the environment than it does to help it.
- We expect that as currently written, Regulation 606 will result in significant curtailment to hotel courtesy shuttle operations. As a result, hours will be cut and jobs will be lost at our businesses.
- When hotel courtesy shuttle services become limited, travelers needing to get to a nearby hotel will need to secure transportation services individually and this will work contrary to a stated goal of Regulation 606 (ie. reducing traffic volumes at the curb).
- More volume of traffic via individual cars versus shuttle buses and vans will mean greater carbon emissions incurred.
- And, when travelers don't have convenient access to their hotel, they will incur added waiting time and frustration.

Rest assured, the hotel business community continues to support a comprehensive and long-term approach to improve courtesy transportation services at MWAA facilities. In that same spirit, HTC urges MWAA leadership to collaborate with us to arrive at a viable and effective solution. In return, the HTC pledges to coordinate a timely process. We are well organized and have a representative-style task force to lead us in an efficient fashion.

By working together, the MWAA and HTC can develop and implement a truly ground-breaking transportation operations plan.

Respectfully submitted,  
The Hotel Transportation Coalition