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Rudy Smith Service, Inc. Towing and Recovery Specialists

November 29, 2021

Louisiana Public Service Commission Transportation Section P.O. Box 91154 Baton Rouge, La 70821 RECEIVED BY FAX NOV 3 0 2021

LOUISIANA PUBLIC SERVICE COMMISSION

Via Facsimile: 225-342-0877

Re:

Docket # R-35595; Motion to Intervene Out of Time and Submit Comments, Without Intent to Delay the Docket.

To Whom it may concern.

Rudy Smith Service, Inc herein submits a motion to intervene and submit comments on Docket R-35595. Please add us to the service list for this docket. Hard copies & fees will follow.

Comments are as follows:

Faulty Rate Setting Model:

Without exception, from the time of the original General Order formulated in 2000, regulated non-consensual towing rates have been formed and adjusted using subjective information and opinion.

LPSC staff notes refer to, "convening with representatives of each District Office"; "increasing number of complaints relating to charges"; "received written comments from shippers who routinely use wrecker services" (consensual towing); "data obtained from individual tariffs"; "rates previously existing in parish ordinances and other states"; "reviewed the rates for non-consensual tows in other jurisdictions"

None of the referenced sources have any basis in objective data collection or costing studies thereby making any determination of rates derived from this information unrealistic and unfair to the regulated industry.

Early in the rate making process, the Towing & Recovery Professionals of Louisiana commissioned and presented a study conducted by Rebowe & Company, CPA. This selected CPA company had previously performed work for the LPSC. That study presented an objective analysis, derived from data, outlined the costs of performing "nonconsensual towing services" and presented rate recommendations based on the cost of providing non-consensual towing services.

Although objective, the study was paid for by the towing association and was given substantially less consideration than subjective opinions outlined above. The resulting General Order rates were considerably lower than what the study had supported.

Since the early 2000's, General Order rating adjustments have followed the same script, relying on faulty subjective data adjusted by a CPI that has no correlation to the true costs of providing non-consensual towing & recovery services. Of note is that if the initial rates adopted in 2000 were adjusted by the simple CPI through midyear 2021 without other considerations, the resulting current rate would be 12% higher than the rates staff recommendations for the current docket.

5 Year component cost comparison:

Quick Cost Comparisons using actual invoices paid by RSS towing 2016-2021:

2016

2021

Insurance

\$77,039

\$166,924.xx

170% increase

Same Terms 10 trucks insured

8 trucks insured

Equipment \$71,721

\$109,154

52% increase

Basic Flatbed, Exact Same Specs

Using 2016 as a base line, postage rates are up 24%; labor and rent have increased by multiples of the CPI adjustment recommendation.

These facts support the statement that there is no correlation of the long-used CPI index. The practice of relying on a CPI as "the" factor and justification for correcting rate level adjustments should be discontinued and replaced with reoccurring cost modeling studies.

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Services cannot be provided:

At current regulated rates, Rudy Smith Service is unable to cover the variable costs or contribute to fixed costs necessary to offer 24-7 non-consensual towing services. As a result, after 40 plus years of service, RSS has discontinued providing non-consensual heavy duty towing services to the City of New Orleans. Additionally, RSS notified the City that it will be selective as to the types of light duty non-consensual calls accepted and that the response time for non-consensual tows will be longer. We actively refuse calls and, in some cases, arrive on scene to then abandon the vehicle, thus avoiding costs of towing, storing, reporting, notification plus the costs of disposing of junk. As the latest example, on 11/28/21 RSS was dispatched to tow a burned valueless pickup truck. When told that we were abandoning the vehicle, the City of New Orleans issued a purchase order number to supplement the costs of towing so that the vehicle could be removed to storage.

The above statements can be verified by contacting the New Orleans Police Dept Towing & Recovery Unit. They will also report that other towing companies have been forced to adopt similar procedures.

Of note is that, due to inflation, Rudy Smith Service had to adjust consensual towing rates by 19% during the second quarter of 2021. This increase had followed 3 other price adjustments between the years 2016 and 2021, all without customer complaint.

Modeling Cost Study:

Non-Consensual towing is very different from consensual services that are ordered by a vehicle owner, in a voluntary arm's length transaction, where parties agree to terms prior to the dispatching of a tow truck. Because there is a prior agreement to terms, consensual towing costs can be modeled after conventional transportation services like freight delivery or taxi services.

The emergency nature of non-consensual towing, with the inability to verify a customer's ability to pay, the inability to negotiate terms, the considerable labor & equipment required to be kept in a standby nonproductive status 24-7, the quick response requirement, the extra administrative tasks required by law, and the need to store nonpaying vehicles for months on end before disposal, requires a vastly different rate adjust model.

The associated costs of providing non-consensual towing services are more in line with fire, police & ambulance costs. For these reasons the transportation CPI is not relevant, should be abandoned as a tool and replaced by objective cost modeling study performed every 8 years. An index or Federal report that reflects the emergency service costs of providing fire, police and ambulance services should replace the CPI currently in use. This adjustment should be applied every year between 8-year objective cost studies. A yearly procedure would lessen the sticker shock that many years apart General Order adjustments have caused in the past.

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Because the vast differences in operational costs and bad debt expenses of nonconsensual verses consensual services, non-consensual rates should be set in a vacuum without the use of comparisons to the business of providing consensual transportation services.

8/5/2016 Commission Action attempted to address the problem:

"IT IS THEREFORE ORDERED: The Proposed Order, including Attachment A, "Schedule of Prescribed Rates and Requirements for Non-Consensual Towing and Recovery Services," is approved as interim in nature, pending retention of an outside consultant to review rates and fees and the potential further revision of the Order upon receipt of the consultant's report." (emphasis added)

The Commission has been unable to attract a qualified consultant able to produce an independent data driven rate review. Subsequently failing to secure a consultant, the Commission had agreed to use inhouse staff to perform the needed study. This study has now lagged for over 5 years leaving the towing industry handcuffed with low rates that have no legitimate basis. 6 years later, the current recommendation uses the same "interim" theme in the closing statement. "The 6.91% increase is <u>an interim</u> increase only until the LPSC is able to issue a final order in this matter."

New Fees to be Set by the Commission:

Emergency rates on new fees transferred from Legislative to Commission oversite.

Gate Fees:

A Gate Fee of \$45.00 was set by the Legislature in 1999 and has never been adjusted. Currently towing companies refuse to go the storage facility to release vehicles or personal effects after hours. They cannot provide the service at the current rate or proposed regulated rate.

On an emergency basis to use the CPI as an interim tool, inflation from 1999 would indicate that the 2021 rate should be set at \$73.35. I would submit that there never was a study of any type performed by the Legislature and that the actual price to support the service is much higher. Nobody is going out at night or weekends to open gates for \$75.

Administrative Fees:

The administrative Fee was arbitrarily set at \$25 by the Legislature in 1989 and has never been adjusted. Again using the CPI as a emergency tool would indicate that if the administrative fee of \$25 was right in 1989, the current rate for 2021 should be set at \$54.75. Again, there was no study.

It is important to understand that the administration fee must cover all costs of services required by law and produce a profit over those required expenses. The fee must be set high enough to cover the unpaid administrative expenses incurred for vehicles that are never picked up and must then be disposed of.

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Services required:

- Labor required to survey vehicle and gather vehicle Identification number. At times this can require removing vehicle parts and or a State Police Physical Inspection.
- Fees required to be paid to State's agent to report stored vehicle & return owner & lienholder information otherwise known as the Official Report of Stored Vehicle (ORSV).
- 3) Internal clerical labor to report vehicles to State's agent
- 4) Labor to prepare notification letters or fees paid to outside mailing agent.
- 5) Postage
- 6) Labor to report vehicles to local law enforcement as required by law.
- Labor to respond to phone requests for information from law enforcement, owners, lien holders & insurance companies.
- 8) Costs to maintain files on each vehicle for 3 years.

Notification Letter Fees:

Since 1989 the per letter fee has never been adjusted from the regulated rate set at actual postage costs plus \$4.00. U.S. Postage during the subject period has gone up 250%. If towing company labor and materials are equated to the rate increase of postage, the current rates should be \$10 plus the costs of postage.

Most towing companies in the State use one of 3 State agents to do their mailings. Because mailing service companies are volume efficient and receive discounts for their USPS mail volume, towing companies are subletting all mailing tasks. Even with mail house volume efficiencies, the mail services charge more for mailing notices than towing companies are allowed to charge. The loss on every single letter mailed is compounded by the inability for towing companies to collect for letters sent out on junk vehicles. As approximately 50% of letters mailed cannot be invoiced, the losses on mailings notification letters are significant.

Administration & Notification Support Data Provided:

Attached to the back of these comments is a spreadsheet reporting the actual costs, revenue & uncollected service fees for administration and notification mailings by Rudy Smith Service for the first 3 quarters of 2021. These costs are finite, absolute, and consistent across all Louisiana towing companies. The data will also demonstrate the percentages of vehicles that picked up or paid for. Each \$0.00 reported with an invoice # represents a vehicle not retrieved or paid for. Note that the percentage of non-retrieved vehicles is lower for 2021 since RSS has started refusing junk vehicle tows.

Upon request, active spreadsheet files are available for staff use. Files can also be generated for any period requested.

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Closing Points:

The "Motor Vehicle Insurance CPI" includes passenger vehicle costs that make up a significant percentage of the data pool. The inflation of commercial insurance rates is far greater than that of passenger vehicles.

Further the staff summary indicates that "The data period used was January 2019 through December 2020. Staff did not use data from 2021... However, Staff does note that there was a significant upward trend during this year."

Because any study will be many months in coming, the inflation data should include an inflation adjustment for periods at least back to 2016 and should also include some factor reflecting the "significant upward trend during this year."

In the interests of providing equitable temporary rate relief that more accurately reflects the costs of providing non-consensual towing services I would request that a quick polling of 4 to 5 towing companies should be performed. This could be a very short, simple survey, requesting documented receipts for insurance, equipment, labor (FTE costs) from 2016 to 2021. The results will be startling when compared to assumptions gardened from a simple application of CPI indexes for two years. The survey of actual data will indicate that a rate adjustment of 3X's the suggested rates is justified.

Sincerely,

W. Rudy Smith

President, Rudy Smith Service, Inc

rudy@rudysmith.com

lattachment

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RSS data 1st 3 quarters of 2021

notes:

blocks = \$0 & high lighted represent no payment for services

Date = all vehicles released or crushed with files completed between 1/1/21 to 9/30/21

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230090-1 7/27/2021 18:26 Notification Letter(s) Ow \$0.00 230390-1 8/5/2021 18:24 Notification Letter(s) Ow \$0.00 229068-1 3/9/2021 21:15 Notification Letter(s) Ow \$0.00 229312-1 3/15/2021 20:06 Notification Letter(s) Ow \$0.00 229782-1 7/9/2021 14:43 Notification Letter(s) Ow \$0.00 230129-1 7/9/2021 14:43 Notification Letter(s) Ow \$0.00 230288-1 1/13/2021 17:17 Notification Letter(s) Ow \$9.86 230713-1 2/24/2021 20:58 Notification Letter(s) Ow \$4.95 231714-1 5/6/2021 21:38 Notification Letter(s) Ow \$4.95 232089-1 5/28/2021 18:56 Notification Letter(s) Ow \$9.90 232573-1 7/8/2021 15:53 Notification Letter(s) Ow \$9.90 233750-1 9/22/2021 19:35 Notification Letter(s) Ow \$5.00 234035-1 9/24/2021 20:16 Notification Letter(s) Ow \$5.00 234035-1 9/24/2021 20:16 Notification Letter(s) Ow \$9.90 231738-1 4/28/2021 14:43 Notification Letter(s) Ow \$9.90 230735-1 8/3/2021 19:54 Notification Letter(s) Ow \$9.90 230735-1 8/3/2021 19:54 Notification Letter(s) Ow \$9.90<	226929-1	3/12/2021 21:59	Notification Letter(s) Ov	<u>\$0.00</u>
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231396-1 4/9/2021 21:19 Notification Letter(s) Ow \$4.95 231310-1 4/20/2021 17:16 Notification Letter(s) Ow \$4.95 230043-1 7/13/2021 14:58 Notification Letter(s) Ow \$0.00 220140-1 6/17/2021 20:37 Notification Letter(s) Ow \$0.00 230287-1 1/15/2021 17:19 Notification Letter(s) Ow \$9.86	230735-1	8/3/2021 19:54	Notification Letter(s) Ov	\$0.00
230043-1 7/13/2021 14:58 Notification Letter(s) Ow \$0.00 220140-1 6/17/2021 20:37 Notification Letter(s) Ow \$0.00 230287-1 1/15/2021 17:19 Notification Letter(s) Ow \$9.86	231396-1	4/9/2021 21:19	Notification Letter(s) Ov	
230043-1 7/13/2021 14:58 Notification Letter(s) Ow \$0.00 220140-1 6/17/2021 20:37 Notification Letter(s) Ow \$0.00 230287-1 1/15/2021 17:19 Notification Letter(s) Ow \$9.86	231310-1	4/20/2021 17:16	Notification Letter(s) Ov	
220140-1 6/17/2021 20:37 Notification Letter(s) Ov \$0.00 230287-1 1/15/2021 17:19 Notification Letter(s) Ov \$9.86	230043-1	7/13/2021 14:58	Notification Letter(s) Ov	
230287-1 1/15/2021 17:19 Notification Letter(s) Ow \$9.86	220140-1	6/17/2021 20:37	Notification Letter(s) Ov	
The barrier of the state of the	230287-1			
	230376-1	3/9/2021 20:27	Notification Letter(s) Ov	

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231014-1	3/17/2021 15:06	Notification Letter(s) Ov	\$9.90
232474-1	6/14/2021 18:24	Notification Letter(s) Ov	\$4.95
226244-1	2/23/2021 16:44	Notification Letter(s) Ov	\$0.00
228327-1	7/9/2021 14:43	Notification Letter(s) Ov	\$0.00
223424-1	2/26/2021 22:53	Notification Letter(s) Ov	\$0.00
228698-1	1/14/2021 21:06	Notification Letter(s) Ov	\$0.00
230314-1	3/11/2021 21:06	Notification Letter(s) Ov	\$9.86
230887-1	4/14/2021 18:00	Notification Letter(s) Ov	\$4.95
230888-1	4/8/2021 17:55	Notification Letter(s) Ov	\$4.95
230891-1	4/7/2021 15:40	Notification Letter(s) Ov	\$4.95
230893-1	3/23/2021 15:11	Notification Letter(s) Ov	\$9.90
230895-1	3/23/2021 18:27	Notification Letter(s) Ow	\$9.90
231652-1	5/4/2021 14:48	Notification Letter(s) Ov	\$9.90
232010-1	5/25/2021 19:27	Notification Letter(s) Ov	\$9,90
233858-1	9/16/2021 14:15	Notification Letter(s) Ov	\$10.00
232359-1	6/9/2021 19:21	Notification Letter(s) Ov	\$4.95
225824-1	2/23/2021 16:44	Notification Letter(s) Ov	\$0.00
225896-1	7/9/2021 14:43	Notification Letter(s) Ov	<u>\$0.00</u>
226037-1	2/23/2021 16:44	Notification Letter(s) Ov	\$0.00
226289-1	2/23/2021 16:44	Notification Letter(s) Ov	\$0.00
226355-1	2/23/2021 16:44	Notification Letter(s) Ov	\$0.00
226537-1	2/23/2021 16:44	Notification Letter(s) Ov	\$0.00
226851-1	2/23/2021 16:44	Notification Letter(s) Ov	\$0.00
227487-1	2/23/2021 16:44	Notification Letter(s) Ov	\$0.00
227555-1	3/19/2021 20:07	Notification Letter(s) Ov	\$0.00
227916-1	7/9/2021 14:43	Notification Letter(s) Ov	\$0.00
228017-1	2/23/2021 16:44	Notification Letter(s) Ov	\$0.00
228103-1	7/9/2021 14:43	Notification Letter(s) Ov	\$0.00
228222-1	3/9/2021 20:01	Notification Letter(s) Ov	\$0.00
228423-1	7/9/2021 14:43	Notification Letter(s) Ov	\$0.00
228740-1	3/9/2021 21:10	Notification Letter(s) Ov	\$0.00
228823-1	4/16/2021 21:28	Notification Letter(s) Ov	\$0.00
228826-1	7/9/2021 14:43	Notification Letter(s) Ov	\$0.00
228953-1	1/27/2021 21:40	Notification Letter(s) Ov	\$9.86
229003-1	4/27/2021 19:49	Notification Letter(s) Ov	\$0.00
229132-1	7/9/2021 14:43	Notification Letter(s) Ov	\$0.00
229175-1	3/9/2021 19:52	Notification Letter(s) Ov	\$0.00
229191-1	4/27/2021 19:51	Notification Letter(s) Ov	\$0.00
229259-1	4/27/2021 19:45	Notification Letter(s) Ov	<u>\$0.00</u>
229297-1	3/12/2021 22:03	Notification Letter(s) Ov	\$0.00
229592-1	7/28/2021 19:29	Notification Letter(s) Ov	\$0.00
229653-1	3/12/2021 22:05	Notification Letter(s) Ov	\$0.00
229689-1	3/9/2021 21:13	Notification Letter(s) Ov	<u>\$0.00</u>
229693-1	7/9/2021 14:43	Notification Letter(s) Ov	\$0.00
229733-1	7/13/2021 14:58	Notification Letter(s) Ov	\$0.00
229815-1	7/13/2021 14:58	Notification Letter(s) Ov	\$0.00
229951-1	1/8/2021 20:56	Notification Letter(s) Ov	\$4.93

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229971-1	7/9/2021 14:43 Notification Letter(s) Ow	\$0.00
229986-1	1/14/2021 17:39 Notification Letter(s) Ov	\$4.93
229999-1	1/29/2021 20:13 Notification Letter(s) Ow	\$9.86
230018-1	1/4/2021 21:07 Notification Letter(s) Ov	\$9.86
230034-1	7/9/2021 14:43 Notification Letter(s) Ov	<u>\$0.00</u>
230037-1	1/7/2021 18:03 Notification Letter(s) Ow	\$9.86
230104-1	7/9/2021 14:43 Notification Letter(s) Ow	<u>\$0.00</u>
230130-1	2/24/2021 16:13 Notification Letter(s) Ow	\$4.93
230165-1	1/18/2021 21:10 Notification Letter(s) Ow	\$9.86
230170-1	1/5/2021 19:21 Notification Letter(s) Ow	\$9.86
230179-1	1/6/2021 19:51 Notification Letter(s) Ow	\$9.86
230212-1	1/8/2021 21:29 Notification Letter(s) Ow	\$9.86
230278-1	1/15/2021 19:42 Notification Letter(s) Ov	\$9.86
230289-1	1/20/2021 20:15 Notification Letter(s) Ov	\$4.93
230323-1	1/20/2021 21:58 Notification Letter(s) Ov	\$4.93
230335-1	1/26/2021 22:17 Notification Letter(s) Ov	\$4.93
230357-1	2/1/2021 21:33 Notification Letter(s) Ow	\$9.86
230382-1	1/25/2021 19:15 Notification Letter(s) Ov	\$4.93
230408-1	3/10/2021 20:13 Notification Letter(s) Ow	<u>\$0.00</u>
230417-1	2/1/2021 22:02 Notification Letter(s) Ov	\$9.90
230447-1	6/2/2021 21:23 Notification Letter(s) Ov	\$0.00
230502-1	2/3/2021 21:25 Notification Letter(s) Ow	\$9.90
230558-1	2/5/2021 22:07 Notification Letter(s) Ov	\$4.95
230578-1	2/15/2021 16:35 Notification Letter(s) Ov	\$9.90
230584-1	2/15/2021 17:33 Notification Letter(s) Ov	\$9.90
230626-1	2/23/2021 15:18 Notification Letter(s) Ov	\$4.95
230637-1	2/17/2021 17:47 Notification Letter(s) Ov	\$4.95
230663-1	2/24/2021 21:57 Notification Letter(s) Ov	\$9.90
230676-1	7/13/2021 14:58 Notification Letter(s) Ov	<u>\$0.00</u>
230704-1	2/23/2021 15:18 Notification Letter(s) Ov	\$4.95
230755-1	4/14/2021 18:35 Notification Letter(s) Ov	<u>\$0.00</u>
230769-1	2/24/2021 19:59 Notification Letter(s) Ov	\$9.90
230797-1	3/4/2021 20:08 Notification Letter(s) Ov	\$9.90
230806-1	2/26/2021 21:45 Notification Letter(s) Ov	\$4.95
230830-1	7/9/2021 14:43 Notification Letter(s) Ov	<u>\$0.00</u>
230872-1	7/13/2021 14:58 Notification Letter(s) Ov	<u>\$0.00</u>
230913-1	3/12/2021 15:03 Notification Letter(s) Ow	<u>\$9.90</u>
230921-1	8/6/2021 18:57 Notification Letter(s) Ov	<u>\$0.00</u>
231011-1	7/9/2021 14:43 Notification Letter(s) Ow	\$0.00
231013-1	3/26/2021 16:22 Notification Letter(s) Ov	\$4.95
231060-1	3/19/2021 18:04 Notification Letter(s) Ov	\$9.90
231094-1	3/25/2021 21:11 Notification Letter(s) Ov	\$4.95
231108-1	3/29/2021 14:47 Notification Letter(s) Ov	\$0.00
231118-1	3/25/2021 16:24 Notification Letter(s) Ov	\$9.90
231141-1	4/5/2021 13:48 Notification Letter(s) Ov	\$9.90
231225-1	3/30/2021 18:06 Notification Letter(s) Ow	\$9.90
231314-1	4/16/2021 19:38 Notification Letter(s) Ov	\$9.90

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231332-1	4/7/2021 21:17 Notification Letter(s) Ow	\$9.90
231342-1	4/16/2021 15:02 Notification Letter(s) Ow	\$9.90
231348-1	4/7/2021 15:36 Notification Letter(s) Ow	\$9.90
231411-1	4/23/2021 19:22 Notification Letter(s) Ov	\$9.90
231431-1	4/22/2021 17:30 Notification Letter(s) Ow	\$9.90
231538-1	5/11/2021 21:17 Notification Letter(s) Ow	\$9.90
231583-1	5/6/2021 20:23 Notification Letter(s) Ov	\$9.90
231588-1	4/26/2021 20:01 Notification Letter(s) Ov	\$9.90
231596-1	4/27/2021 18:37 Notification Letter(s) Ov	\$9.90
231623-1	5/6/2021 20:19 Notification Letter(s) Ov	\$9.90
231637-1	4/23/2021 19:51 Notification Letter(s) Ov	\$9.90
231681-1	4/30/2021 14:23 Notification Letter(s) Ov	\$9.90
231698-1	4/30/2021 20:45 Notification Letter(s) Ov	\$9,90
231761-1	5/10/2021 15:05 Notification Letter(s) Ow	\$4.95
231788-1	7/2/2021 15:01 Notification Letter(s) Ov	\$9.90
232019-1	5/27/2021 18:24 Notification Letter(s) Ov	\$4.95
232081-1	5/25/2021 15:00 Notification Letter(s) Ow	\$4.95
232088-1	5/26/2021 18:30 Notification Letter(s) Ov	\$4.95
232128-1	5/27/2021 21:19 Notification Letter(s) Ov	\$9.90
232217-1	5/28/2021 20:23 Notification Letter(s) Ov	\$9.90
232288-1	6/4/2021 17:53 Notification Letter(s) Ov	\$4.95
232303-1	6/3/2021 22:13 Notification Letter(s) Ov	\$4.95
232309-1	6/11/2021 17:59 Notification Letter(s) Ov	\$4.95
232316-1	6/4/2021 17:56 Notification Letter(s) Ov	\$4.95
232326-1	6/10/2021 20:09 Notification Letter(s) Ov	\$4.95
232373-1	6/15/2021 16:10 Notification Letter(s) Ov	\$9.90
232519-1	6/24/2021 17:20 Notification Letter(s) Ov	\$4.95
232560-1	7/27/2021 14:16 Notification Letter(s) Ow	\$9.90
232659-1	6/23/2021 19:31 Notification Letter(s) Ow	\$4.95
232682-1	7/1/2021 21:02 Notification Letter(s) Ow	\$9.90
232700-1	7/1/2021 15:33 Notification Letter(s) Ow	\$9.90
232745-1	7/8/2021 21:49 Notification Letter(s) Ov	\$14.85
232758-1	7/1/2021 21:14 Notification Letter(s) Ow	\$9.90
232762-1	6/30/2021 20:29 Notification Letter(s) Ow	\$9.90
232791-1	7/1/2021 14:02 Notification Letter(s) Ow	\$4.95
232837-1	8/12/2021 15:43 Notification Letter(s) Ov	\$9.90
232861-1	7/13/2021 17:24 Notification Letter(s) Ow	\$9.90
232882-1	7/28/2021 21:23 Notification Letter(s) Ow	\$4.95
232905-1	7/23/2021 20:07 Notification Letter(s) Ov	\$9.90
232921-1	7/26/2021 18:16 Notification Letter(s) Ow	\$9.90
232963-1	7/20/2021 14:09 Notification Letter(s) Ov	\$9.90
232987-1	7/16/2021 14:51 Notification Letter(s) Ow	\$9.90
233001-1	7/15/2021 16:39 Notification Letter(s) Ow	\$9.90
233008-1	7/14/2021 20:22 Notification Letter(s) Ow	\$9.90
233035-1	7/23/2021 19:42 Notification Letter(s) Ow	\$9.90
233051-1	7/21/2021 20:09 Notification Letter(s) Ov	\$9.90
233104-1	7/23/2021 13:16 Notification Letter(s) Ow	\$9.90

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233123-1	7/28/2021 17:04 Notification Letter(s) Ov	\$9.90
233163-1	7/26/2021 14:49 Notification Letter(s) Ov	\$9.90
233184-1	7/29/2021 14:50 Notification Letter(s) Ov	\$4.95
233247-1	8/5/2021 16:37 Notification Letter(s) Ov	\$9.90
233258-1	9/3/2021 17:53 Notification Letter(s) Ow	\$9.90
233466-1	8/20/2021 19:16 Notification Letter(s) Ov	\$9.90
233503-1	9/3/2021 17:58 Notification Letter(s) Ov	\$9.90
233534-1	8/23/2021 17:16 Notification Letter(s) Ov	\$9.90
233652-1	9/22/2021 14:00 Notification Letter(s) Ov	\$9.90
233795-1	9/14/2021 19:09 Notification Letter(s) Ov	\$10.00
233959-1	9/27/2021 16:41 Notification Letter(s) Ov	\$10.00
229674-1	3/12/2021 22:02 Notification Letter(s) Ov	\$0.00
229026-1	4/14/2021 18:40 Notification Letter(s) Ov	\$0.00
229027-1	7/9/2021 14:43 Notification Letter(s) Ov	\$0.00
229028-1	3/9/2021 19:58 Notification Letter(s) Ov	\$0.00
229524-1	4/16/2021 21:26 Notification Letter(s) Ov	\$0.00
228013-1	3/19/2021 20:09 Notification Letter(s) Ov	\$0.00
231025-1	5/18/2021 19:43 Notification Letter(s) Ow	\$9.90
231236-1	5/6/2021 20:22 Notification Letter(s) Ow	\$4.95
225187-1	6/7/2021 17:54 Notification Letter(s) Ov	\$0.00
226201-1	7/28/2021 19:24 Notification Letter(s) Ov	\$0.00
228852-1	3/15/2021 20:02 Notification Letter(s) Ov	\$0.00
230038-1	8/3/2021 19:57 Notification Letter(s) Ov	<u>\$0.00</u>
230529-1	3/26/2021 16:32 Notification Letter(s) Ow	\$4.95
230695-1	7/9/2021 14:43 Notification Letter(s) Ov	<u>\$0.00</u>
230788-1	3/4/2021 21:36 Notification Letter(s) Ov	\$9.90
230849-1	3/5/2021 16:17 Notification Letter(s) Ov	\$9.90
231511-1	7/9/2021 14:43 Notification Letter(s) Ov	<u>\$0.00</u>
231699-1	5/14/2021 20:20 Notification Letter(s) Ow	\$9.90
231933-1	5/10/2021 15:52 Notification Letter(s) Ov	\$9.90
232423-1	6/17/2021 19:30 Notification Letter(s) Ow	\$9.90
232466-1	6/15/2021 20:53 Notification Letter(s) Ov	\$4.95
232524-1	6/25/2021 18:07 Notification Letter(s) Ow	\$9.90
232763-1	7/12/2021 15:34 Notification Letter(s) Ow	\$4.95
232920-1	7/12/2021 15:29 Notification Letter(s) Ow	\$9,90
233154-1	8/16/2021 20:36 Notification Letter(s) Ov	\$4.95
233338-1	8/24/2021 20:26 Notification Letter(s) Ow	\$9.90
230395-1	7/13/2021 14:58 Notification Letter(s) Ow	\$0.00
	•	-

Total revenue collected for notification letters

\$1,173.05

Total cost paid to TowLien by RSS for mailing notification letters

\$2,946.00

Loss on Notification Letters
Would require over 150% rate increases to break even



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226586-1	2/26/2021 19:15 State Report ORSV Fee	<u>\$0.00</u>
229709-1	3/15/2021 20:05 State Report ORSV Fee	<u>\$0.00</u>
229711-1	7/9/2021 14:43 State Report ORSV Fee	<u>\$0.00</u>
233895-1	9/20/2021 20:59 State Report ORSV Fee	\$30.00
234005-1	9/27/2021 15:03 State Report ORSV Fee	\$25.00
231152-1	4/16/2021 16:50 State Report ORSV Fee	\$25.00
231552-1	6/9/2021 19:40 State Report ORSV Fee	\$30.00
221768-1	2/23/2021 16:44 State Report ORSV Fee	\$0.00
230226-1	1/15/2021 16:07 State Report ORSV Fee	\$25.00
232193-1	5/28/2021 13:15 State Report ORSV Fee	\$25.00
232597-1	6/28/2021 21:09 State Report ORSV Fee	\$25.00
233660-1	8/26/2021 19:57 State Report ORSV Fee	\$25.00
223384-1	2/23/2021 16:44 State Report ORSV Fee	\$0.00
226929-1	3/12/2021 21:59 State Report ORSV Fee	\$0.00
229451-1	3/12/2021 22:09 State Report ORSV Fee	\$0.00
230090-1	7/27/2021 18:26 State Report ORSV Fee	<u>\$0.00</u>
230390-1	8/5/2021 18:24 State Report ORSV Fee	\$0.00
229068-1	3/9/2021 21:15 State Report ORSV Fee	\$0.00
229312-1	3/15/2021 20:06 State Report ORSV Fee	\$0.00
229782-1	7/9/2021 14:43 State Report ORSV Fee	\$0.00
229811-1	4/27/2021 19:46 State Report ORSV Fee	\$0.00
230129-1	7/9/2021 14:43 State Report ORSV Fee	\$0.00
230288-1	1/13/2021 17:17 State Report ORSV Fee	\$25.00
230713-1	2/24/2021 20:58 State Report ORSV Fee	\$30.00
231714-1	5/6/2021 21:38 State Report ORSV Fee	\$25.00
232089-1	5/28/2021 18:56 State Report ORSV Fee	\$25.00
232573-1	7/8/2021 15:53 State Report ORSV Fee	\$25.00
232816-1	7/16/2021 17:26 State Report ORSV Fee	\$25.00
233750-1	9/22/2021 19:35 State Report ORSV Fee	\$25,00
234035-1	9/24/2021 20:16 State Report ORSV Fee	\$30.00
226526-1	2/17/2021 22:56 State Report ORSV Fee	\$0.00
229248-1	7/9/2021 14:43 State Report ORSV Fee	\$0.00
231738-1	4/28/2021 14:15 State Report ORSV Fee	\$25.00
232014-1	5/21/2021 16:31 State Report ORSV Fee	\$25.00
230735-1	8/3/2021 19:54 State Report ORSV Fee	\$0.00
231396-1	4/9/2021 21:19 State Report ORSV Fee	\$25.00
231310-1	4/20/2021 17:16 State Report ORSV Fee	\$25.00
230043-1	7/13/2021 14:58 State Report ORSV Fee	\$0.00
220140-1	6/17/2021 20:37 State Report ORSV Fee	\$0.00
230287-1	1/15/2021 17:19 State Report ORSV Fee	\$25.00
230376-1	3/9/2021 20:27 State Report ORSV Fee	\$25.00
231014-1	3/17/2021 15:06 State Report ORSV Fee	\$25.00
	· · · · · · · · · · · · · · · · · · ·	4.0.00

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232474-1	6/14/2021 18:24 State Report ORSV Fee	\$30.00
226244-1	2/23/2021 16:44 State Report ORSV Fee	\$0.00
228327-1	7/9/2021 14:43 State Report ORSV Fee	<u>\$0.00</u>
223424-1	2/26/2021 22:53 State Report ORSV Fee	\$0.00
228698-1	1/14/2021 21:06 State Report ORSV Fee	<u>\$0.00</u>
230314-1	3/11/2021 21:06 State Report ÖRSV Fee	\$25.00
230887-1	4/14/2021 18:00 State Report ORSV Fee	\$30.00
230888-1	4/8/2021 17:55 State Report ORSV Fee	\$30.00
230891-1	4/7/2021 15:40 State Report ORSV Fee	\$30.00
230893-1	3/23/2021 15:11 State Report ORSV Fee	\$25.00
230895-1	3/23/2021 18:27 State Report ORSV Fee	\$25.00
231652-1	5/4/2021 14:48 State Report ORSV Fee	\$25.00
232010-1	5/25/2021 19:27 State Report ORSV Fee	\$25.00
233858-1	9/16/2021 14:15 State Report ORSV Fee	\$25.00
232359-1	6/9/2021 19:21 State Report ORSV Fee	\$30.00
225824-1	2/23/2021 16:44 State Report ORSV Fee	\$0.00
225896-1	7/9/2021 14:43 State Report ORSV Fee	\$0.00
226037-1	2/23/2021 16:44 State Report ORSV Fee	\$0.00
226289-1	2/23/2021 16:44 State Report ORSV Fee	\$0.00
226355-1	2/23/2021 16:44 State Report ORSV Fee	\$0.00
226537-1	2/23/2021 16:44 State Report ORSV Fee	\$0.00
226851-1	2/23/2021 16:44 State Report ORSV Fee	\$0.00
227487-1	2/23/2021 16:44 State Report ORSV Fee	<u>\$0.00</u>
227555-1	3/19/2021 20:07 State Report ORSV Fee	<u>\$0.00</u>
227916-1	7/9/2021 14:43 State Report ORSV Fee	<u>\$0.00</u>
228017-1	2/23/2021 16:44 State Report ORSV Fee	<u>\$0.00</u>
228103-1	7/9/2021 14:43 State Report ORSV Fee	<u>\$0.00</u>
228222-1	3/9/2021 20:01 State Report ORSV Fee	<u>\$0.00</u>
228423-1	7/9/2021 14:43 State Report ORSV Fee	<u>\$0.00</u>
228740-1	3/9/2021 21:10 State Report ORSV Fee	<u>\$0.00</u>
228823-1	4/16/2021 21:28 State Report ORSV Fee	\$0.00
228826-1	7/9/2021 14:43 State Report ORSV Fee	<u>\$0.00</u>
228953-1	1/27/2021 21:40 State Report ORSV Fee	\$25.00
229003-1	4/27/2021 19:49 State Report ORSV Fee	<u>\$0.00</u>
229132-1	7/9/2021 14:43 State Report ORSV Fee	\$0.00
229175-1	3/9/2021 19:52 State Report ORSV Fee	\$0.00
229191-1	4/27/2021 19:51 State Report ORSV Fee	\$0.00
229259-1	4/27/2021 19:45 State Report ORSV Fee	\$0.00
229297-1	3/12/2021 22:03 State Report ORSV Fee	\$0.00
229592-1	7/28/2021 19:29 State Report ORSV Fee	\$0.00
229653-1	3/12/2021 22:05 State Report ORSV Fee	\$0.00
229689-1 229693-1	3/9/2021 21:13 State Report ORSV Fee	\$0.00
229093~1	7/9/2021 14:43 State Report ORSV Fee	\$0.00
229815-1	7/13/2021 14:58 State Report ORSV Fee	\$0.00
229951-1	7/13/2021 14:58 State Report ORSV Fee	\$0.00
229971-1	1/8/2021 20:56 State Report ORSV Fee	\$30.00
~~301 Y-T	7/9/2021 14:43 State Report ORSV Fee	\$0.00

NOV-29-2021 04:52 PM From:15047082900 ID:LpscRecordsFax Page:014 R=93%

229986-1	1/14/2021 17:39 State Report ORSV Fee	\$25.00
229999-1	1/29/2021 20:13 State Report ORSV Fee	\$25.00
230018-1	1/4/2021 21:07 State Report ORSV Fee	\$25.00
230034-1	7/9/2021 14:43 State Report ORSV Fee	\$0.00
230037-1	1/7/2021 18:03 State Report ORSV Fee	\$25.00
230104-1	7/9/2021 14:43 State Report ORSV Fee	\$0.00
230130-1	2/24/2021 16:13 State Report ORSV Fee	\$25.00
230165-1	1/18/2021 21:10 State Report ORSV Fee	\$25.00
230170-1	1/5/2021 19:21 State Report ORSV Fee	\$25.00
230179-1	1/6/2021 19:51 State Report ORSV Fee	\$25.00
230212-1	1/8/2021 21:29 State Report ORSV Fee	\$25.00
230278-1	1/15/2021 19:42 State Report ORSV Fee	\$25.00
230289-1	1/20/2021 20:15 State Report ORSV Fee	\$30.00
230323-1	1/20/2021 21:58 State Report ORSV Fee	\$25.00
230335-1 230357-1	1/26/2021 22:17 State Report ORSV Fee	\$25.00
	2/1/2021 21:33 State Report ORSV Fee	\$25.00
230382-1	1/25/2021 19:15 State Report ORSV Fee	\$25.00
230408-1 230417-1	3/10/2021 20:13 State Report ORSV Fee	<u>\$0.00</u>
230447-1	2/1/2021 22:02 State Report ORSV Fee	\$25.00
230502-1	6/2/2021 21:23 State Report ORSV Fee	\$0.00
230558-1	2/3/2021 21:25 State Report ORSV Fee	\$25.00
230578-1	2/5/2021 22:07 State Report ORSV Fee	\$25.00
230584-1	2/15/2021 16:35 State Report ORSV Fee	\$25.00
230626-1	2/15/2021 17:33 State Report ORSV Fee 2/23/2021 15:18 State Report ORSV Fee	\$25.00
230637-1	2/17/2021 17:47 State Report ORSV Fee	\$25.00
230663-1	2/24/2021 21:57 State Report ORSV Fee	\$25.00
230676-1	7/13/2021 14:58 State Report ORSV Fee	\$0.00
230704-1	2/23/2021 15:18 State Report ORSV Fee	\$25.00
230755-1	4/14/2021 18:35 State Report ORSV Fee	\$0.00
230769-1	2/24/2021 19:59 State Report ORSV Fee	\$25.00
230797-1	3/4/2021 20:08 State Report ORSV Fee	\$25.00
230806-1	2/26/2021 21:45 State Report ORSV Fee	\$25.00
230830-1	7/9/2021 14:43 State Report ORSV Fee	\$0.00
230872-1	7/13/2021 14:58 State Report ORSV Fee	\$0.00
230913-1	3/12/2021 15:03 State Report ORSV Fee	\$25.00
230921-1	8/6/2021 18:57 State Report ORSV Fee	\$0.00
231011-1	7/9/2021 14:43 State Report ORSV Fee	\$0.00
231013-1	3/26/2021 16:22 State Report ORSV Fee	\$25.00
231060-1	3/19/2021 18:04 State Report ORSV Fee	\$25.00
231094-1	3/25/2021 21:11 State Report ORSV Fee	\$25.00
231108-1	3/29/2021 14:47 State Report ORSV Fee	\$0.00
231118-1	3/25/2021 16:24 State Report ORSV Fee	\$25.00
231141-1	4/5/2021 13:48 State Report ORSV Fee	\$25.00
231225-1	3/30/2021 18:06 State Report ORSV Fee	\$25.00
231314-1	4/16/2021 19:38 State Report ORSV Fee	\$25.00
231332-1	4/7/2021 21:17 State Report ORSV Fee	\$25.00

NOV-29-2021 04:53 PM From:15047082900 ID:LpscRecordsFax Page:015 R=93%

231342-1	4/16/2021 15:02 State Report ORSV Fee	\$25.00
231348-1	4/7/2021 15:36 State Report ORSV Fee	\$25.00
231411-1	4/23/2021 19:22 State Report ORSV Fee	\$25.00
231431-1	4/22/2021 17:30 State Report ORSV Fee	\$25.00
231538-1	5/11/2021 21:17 State Report ORSV Fee	\$25.00
231583-1	5/6/2021 20:23 State Report ORSV Fee	\$25.00
231588-1	4/26/2021 20:01 State Report ORSV Fee	\$25.00
231596-1	4/27/2021 18:37 State Report ORSV Fee	\$25.00
231623-1	5/6/2021 20:19 State Report ORSV Fee	\$25.00
231637-1	4/23/2021 19:51 State Report ORSV Fee	\$25.00
231681-1	4/30/2021 14:23 State Report ORSV Fee	\$25.00
231698-1	4/30/2021 20:45 State Report ORSV Fee	\$25.00
231761-1	5/10/2021 15:05 State Report ORSV Fee	\$30.00
231788-1	7/2/2021 15:01 State Report ORSV Fee	\$25.00
232019-1	5/27/2021 18:24 State Report ORSV Fee	\$25.00
232081-1	5/25/2021 15:00 State Report ORSV Fee	\$25.00
232088-1	5/26/2021 18:30 State Report ORSV Fee	\$25.00
232128-1	5/27/2021 21:19 State Report ORSV Fee	\$25.00
232217-1	5/28/2021 20:23 State Report ORSV Fee	\$25.00
232288-1	6/4/2021 17:53 State Report ORSV Fee	\$30.00
232303-1	6/3/2021 22:13 State Report ORSV Fee	\$25.00
232309-1	6/11/2021 17:59 State Report ORSV Fee	\$30.00
232316-1	6/4/2021 17:56 State Report ORSV Fee	\$25.00
232326-1	6/10/2021 20:09 State Report ORSV Fee	\$25.00
232373-1	6/15/2021 16:10 State Report ORSV Fee	\$25.00
232519-1	6/24/2021 17:20 State Report ORSV Fee	\$25.00
232560-1	7/27/2021 14:16 State Report ORSV Fee	\$25.00
232659-1	6/23/2021 19:31 State Report ORSV Fee	\$25.00
232682-1	7/1/2021 21:02 State Report ORSV Fee	\$25.00
232700-1	7/1/2021 15:33 State Report ORSV Fee	\$25.00
232745-1	7/8/2021 21:49 State Report ORSV Fee	\$25.00
232758-1	7/1/2021 21:14 State Report ORSV Fee	\$25.00
232762-1	6/30/2021 20:29 State Report ORSV Fee	\$25.00
232791-1	7/1/2021 14:02 State Report ORSV Fee	\$25.00
232837-1	8/12/2021 15:43 State Report ORSV Fee	\$25.00
232861-1	7/13/2021 17:24 State Report ORSV Fee	\$30.00
232882-1	7/28/2021 21:23 State Report ORSV Fee	\$25.00
232905-1	7/23/2021 20:07 State Report ORSV Fee	\$30.00
232921-1	7/26/2021 18:16 State Report ORSV Fee	\$25.00
232963-1	7/20/2021 14:09 State Report ORSV Fee	\$25.00
232987-1	7/16/2021 14:51 State Report ORSV Fee	\$25.00
233001-1	7/15/2021 16:39 State Report ORSV Fee	\$25.00
233008-1	7/14/2021 20:22 State Report ORSV Fee	\$25.00
233035-1	7/23/2021 19:42 State Report ORSV Fee	\$25.00
233051-1	7/21/2021 20:09 State Report ORSV Fee	\$25.00
233104-1	7/23/2021 13:16 State Report ORSV Fee	\$25.00
233123-1	7/28/2021 17:04 State Report ORSV Fee	\$25.00

NOV-29-2021 04:54 PM From:15047082900 ID:LpscRecordsFax Page:016 R=93%

233163-1	7/26/2021 14:49 State Report ORSV Fee	\$25.00
233247-1	8/5/2021 16:37 State Report ORSV Fee	\$25.00
233258-1	9/3/2021 17:53 State Report ORSV Fee	\$25.00
233466-1	8/20/2021 19:16 State Report ORSV Fee.	\$25.00
233503-1	9/3/2021 17:58 State Report ORSV Fee	\$25.00
233534-1	8/23/2021 17:16 State Report ORSV Fee	\$25.00
233652-1	9/22/2021 14:00 State Report ORSV Fee	\$25.00
233795-1	9/14/2021 19:09 State Report ORSV Fee	\$30.00
233959-1	9/27/2021 16:41 State Report ORSV Fee	\$25.00
229674-1	3/12/2021 22:02 State Report ORSV Fee	\$0.00
229026-1	4/14/2021 18:40 State Report ORSV Fee	\$0.00
229027-1	7/9/2021 14:43 State Report ORSV Fee	\$0.00
229028-1	3/9/2021 19:58 State Report ORSV Fee	\$0.00
229524-1	4/16/2021 21:26 State Report ORSV Fee	\$0.00
228013-1	3/19/2021 20:09 State Report ORSV Fee	\$0.00
231025-1	5/18/2021 19:43 State Report ORSV Fee	\$25.00
231236-1	5/6/2021 20:22 State Report ORSV Fee	\$30.00
187754-1	2/17/2021 22:59 State Report ORSV Fee	\$0.00
225187-1	6/7/2021 17:54 State Report ORSV Fee	\$0.00
226201-1	7/28/2021 19:24 State Report ORSV Fee	\$0.00
228852-1	3/15/2021 20:02 State Report ORSV Fee	\$0.00
230038-1	8/3/2021 19:57 State Report ORSV Fee	\$0.00
230529-1	3/26/2021 16:32 State Report ORSV Fee	\$30.00
230695-1	7/9/2021 14:43 State Report ORSV Fee	\$0.00
230788-1	3/4/2021 21:36 State Report ORSV Fee	\$25.00
230849-1	3/5/2021 16:17 State Report ORSV Fee	\$25.00
231511-1	7/9/2021 14:43 State Report ORSV Fee	\$0.00
231699-1	5/14/2021 20:20 State Report ORSV Fee	\$25.00
231933-1	5/10/2021 15:52 State Report ORSV Fee	\$25.00
232423-1	6/17/2021 19:30 State Report ORSV Fee	\$25.00
232466-1	6/15/2021 20:53 State Report ORSV Fee	\$30.00
232524-1	6/25/2021 18:07 State Report ORSV Fee	\$25.00
232763-1	7/12/2021 15:34 State Report ORSV Fee	\$25.00
232920-1	7/12/2021 15:29 State Report ORSV Fee	\$30.00
233154-1	8/16/2021 20:36 State Report ORSV Fee	\$25.00
233338-1	8/24/2021 20:26 State Report ORSV Fee	\$25.00
230395-1	7/13/2021 14:58 State Report ORSV Fee	\$0.00
233184-1	7/29/2021 14:50 State Report ORSV Fee	
Total revenue collected for state ORSV Adm Fees		\$3,690.00
Total paid to TowLi	en (state agent) for ORSV submission	\$1,896.00
Net revenue to tow	ving company	\$1,794.00
	1 vehicle processed	Ş1,734.00°
din din	and the state of t	

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Administration / revenue must cover the following & produce a profit Labor required to survey vehicle and gather vehicle Identification number.

At times this can require removing vehicle parts and or a State Police Physical Inspections

Fees required to be paid to State's agent to report stored vehicle & return owner & lienholder information

Labor to report vehicles to State's agent

Labor to prepare notification letters

Postage

Labor to report vehicles to local law enforcement

Labor to respond to phone requests for information from law enforcement, owners, lien holders & insurar

Maintain files on each vehicle for 3 years then shred files

Each vehicle impounded requires clerical & yard attendant time averaging over an hour to complete all legally required adminstrative tasks until released or crushed.

As demonstrated by *underlined highlighted invoice amounts*, a very high percentage of vehicles are not claimed of which costs must be spread over claimed / paying vehicles.

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Email to Fax Delivery

To: 12253420877

From: dsintes@rudysmith.com
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Subj: Docket-35595
Pages: 18

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LOUISIANA PUBLIC SERVICE COMMISSION

NOV-29-2021 04:43 PM

From: 15047082900