

1500 SW Arrowhead Road
Topeka, KS 66604-4027



Phone: 785-271-3100
Fax: 785-271-3354
<http://kcc.ks.gov/>

Jay Scott Emler, Chairman
Shari Feist Albrecht, Commissioner
Pat Apple, Commissioner

Sam Brownback, Governor

NOTICE OF PENALTY ASSESSMENT

December 8, 2016

17-TRAM-229-PEN

Jerry Little, Operations Manager
Tect Aerospace Wellington, Inc.
1515 N A Street
Wellington, Kansas 67152

This is a notice of a penalty assessment for violation of Kansas Motor Carrier Safety Statutes, Rules, and Regulations discovered during a compliance review conducted on November 28, 2016, by Kansas Corporation Commission Special Investigators Verna Jackson and Jared Smith. For a full description of the penalty and process please refer to the Order that is attached to this notice.

IF YOU ACCEPT THE PENALTY:

You have been assessed a \$500 penalty. You have thirty (30) days from service of this Penalty Order to pay the fine amount. Check or money order must be made payable to the Kansas Corporation Commission. Payment is to be mailed to the Transportation Division of the Kansas Corporation Commission at 1500 S.W. Arrowhead Road, Topeka, Kansas 66604, and must include a reference to the docket number of this proceeding. Credit card payment may be made by faxing your credit card information to the Transportation Office at 785-271-3124, using the KCC's credit card payment form found at <http://kcc.ks.gov/trans/creditcard.pdf>.

You must attend a Commission-sponsored safety seminar within the next ninety (90) days and provide Staff with written proof of attendance. A schedule of dates and locations for the safety seminar can be found at the Commission's website http://www.kcc.state.ks.us/trans/safety_meetings.htm.

You must submit to one follow-up safety compliance review within the next 18 months. Staff will contact you at a later date to determine an appropriate time for this review.

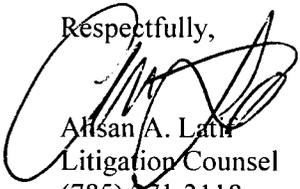
IF YOU CONTEST THE PENALTY:

You have the right to request a hearing. A request for hearing must be made in writing, setting forth the specific grounds upon which relief is sought. Respondent must submit an original and seven (7) copies of the request to the Commission's Secretary at 1500 S.W. Arrowhead Road, Topeka, Kansas 66604 within fifteen (15) days from the date stamped on the last page of the Penalty Order. K.A.R. 82-1-215; K.S.A. 2015 Supp. 77-542.

IF YOU FAIL TO ACT:

Failure to pay the fine amount within thirty (30) days of service of the Penalty Order, or in the alternative, provide a written request for a hearing within fifteen (15) days from service of the Penalty Order will result in the attached Order becoming a Final Order and may result in the additional sanction of suspension and/or revocation of your motor carrier operating authority.

Respectfully,



Ahsan A. Latif
Litigation Counsel
(785) 271-3118

**THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Before Commissioners: Jay Scott Emler, Chairman
 Shari Feist Albrecht
 Pat Apple

In the Matter of the Investigation of **Tect**)
Aerospace Wellington, Inc., of Wellington,)
Kansas, Regarding the Violation of the Motor)
Carrier Safety Statutes, Rules and Regulations) Docket No. 17-TRAM-229-PEN
and the Commission's Authority to Impose)
Penalties, Sanctions and/or the Revocation of)
Motor Carrier Authority.)

PENALTY ORDER

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (Commission). The Commission, having been briefed on the issue by the Director of the Commission's Transportation Division, finds and concludes as follows:

I. JURISDICTION

1. Pursuant to K.S.A. 2015 Supp. 66-1,108b, 66-1,111, 66-1,112, 66-1,114, 66-1,114b and 66-1,115, the Commission is given full power, authority and jurisdiction to supervise and control motor carriers, as defined in K.S.A. 2015 Supp. 66-1,108, doing business or procuring business in Kansas, and is empowered to do all things necessary and convenient for the exercise of such power, authority and jurisdiction.

2. Pursuant to K.S.A. 2015 Supp. 66-1,129a, 66-1,130 and 66-1,142b, the Commission may suspend operations, revoke or amend certificates, and initiate sanctions or fines against every motor carrier and every person who violates any provision of Kansas law in regard to the regulation of such motor carriers and persons, or who fails to obey any order, decision or regulation of the Commission.

3. The Commission has the authority, pursuant to K.A.R. 82-1-237, to investigate an entity under the Commission's jurisdiction and order a hearing on the Commission's own motion when the Commission believes the entity is in violation of the law or any order of the Commission.

II. BACKGROUND

4. Tect Aerospace Wellington, Inc. (Tect Aerospace Wellington) obtained private operating authority from the Commission on May 11, 2012, and operates under KSMCID number 169077 and USDOT number 69383.

5. Fred Wiedower attended a Commission-sponsored Motor Carrier Education and Instructional Meeting on May 11, 2012, on behalf of Tect Aerospace Wellington.

6. Tect Aerospace Wellington is a private motor carrier which primarily hauls aircraft parts.

III. STATEMENT OF FACTS

7. Pursuant to the jurisdiction and authority cited above, on November 28, 2016, Commission Staff (Staff) Special Investigator Verna Jackson and Jared Smith conducted a compliance review of the operations of Tect Aerospace Wellington. A copy of the safety compliance review is included in this Penalty Order as Attachment "A" and is hereby incorporated by reference. As a result of this investigation, Ms. Jackson and Mr. Smith identified one (1) violation of the Motor Carrier Safety Regulations.

- a. On September 8, 2016, Tect Aerospace Wellington required or permitted its driver, Glen Reeser, to operate a CDL-required commercial motor vehicle, a 1995 GMC, VIN ending in 519586, GVWR 22,400 lbs., pulling a 1999 Fontaine trailer, VIN ending in 1586171, GVWR 70,775 lbs., in

intrastate commerce in and around the area of Wellington, Kansas. This trip is evidenced by e-mail from Jerry Little to Jared Smith, dated November 16, 2016, a copy of which is attached hereto as Attachment "B" and is hereby incorporated by reference. At the time of this transportation, Tect Aerospace Wellington failed to make an inquiry every 12 months into the annual motor vehicle record (MVR) of its driver and maintain the response(s) of each state agency in the driver qualification file. The special investigators found three (3) violations of this type. Tect Aerospace Wellington's failure to inquire into its driver's MVR at least once every 12 months and maintain a copy of the MVR in the driver qualification file is a violation of 49 C.F.R. Part 391.25(a) and (c)(1), as adopted by K.A.R. 82-4-3g, as authorized by K.S.A. 2015 Supp. 66-1,112. Staff recommends a fine of \$500.

IV. STAFF'S RECOMMENDATIONS

8. Based upon the available facts, Staff recommends the Commission find Tect Aerospace Wellington committed one (1) violation of Kansas law that governs motor carriers, including various provisions of the Federal Motor Carrier Safety Regulations (FMCSRs), as adopted by the Kansas Administrative Regulations, and is therefore subject to sanctions or fines imposed by the Commission.

9. Additionally, Staff recommends a civil penalty of \$500 for one (1) violation of the Motor Carrier Safety Statutes, Rules and Regulations.

10. Staff further recommends that Tect Aerospace Wellington be required to attend a Commission-sponsored safety seminar within the next ninety (90) days and provide Staff with

written proof of attendance. A schedule of the dates and locations for the safety seminar can be found on the Commission's website at http://kcc.ks.gov/trans/safety_meetings.htm.

11. Finally, Staff recommends that Tect Aerospace Wellington submit to one follow-up safety compliance review within the next eighteen (18) months. Staff will contact the motor carrier at a later date to determine an appropriate time for this review.

V. CONCLUSIONS OF LAW

12. The Commission finds it has jurisdiction over Tect Aerospace Wellington because it is a motor carrier as defined in K.S.A. 2015 Supp. 66-1,108.

13. The Commission finds Tect Aerospace Wellington committed one (1) violation of Kansas law that governs motor carriers, including various provisions of the Federal Motor Carrier Safety Regulations (FMCSRs), as adopted by the Kansas Administrative Regulations, and is therefore subject to sanctions or fines imposed by the Commission.

THE COMMISSION THEREFORE ORDERS THAT:

A. Tect Aerospace Wellington, Inc., of Wellington, Kansas is hereby assessed a \$500 civil penalty for one (1) violation of Kansas law governing the regulation of motor carriers, the Kansas Administrative Regulations and provisions of the Federal Motor Carrier Safety Regulations, as adopted by the Kansas Administrative Regulations.

B. Tect Aerospace Wellington is hereby ordered to attend a Commission-sponsored safety seminar within the next ninety (90) days and is to provide Staff with written proof of attendance. Further, Tect Aerospace Wellington is ordered to submit to one follow-up safety compliance review within the next eighteen (18) months.

C. **Pursuant to K.S.A. 2015 Supp. 77-537 and K.S.A. 77-542, any party may request a hearing on the above issues by submitting a written request, setting forth the**

specific grounds upon which relief is sought, to the Commission's Secretary, at 1500 S.W. Arrowhead Road, Topeka, Kansas 66604 within fifteen (15) days from the date of service of this Order. If service is by certified mail, service is complete upon the date delivered shown on the Domestic Return Receipt. Hearings will be scheduled only upon written request. Failure to timely request a hearing will result in a waiver of Tect Aerospace Wellington's right to a hearing, and this Penalty Order will become a Final Order assessing a \$500 civil penalty against Tect Aerospace Wellington, and ordering Tect Aerospace Wellington to attend a Commission-sponsored safety seminar within the next ninety (90) days and provide Staff with written proof of attendance, and to submit to a safety compliance review within eighteen (18) months from the date of service of this Order.

D. Attorneys for all parties shall enter their appearances in Commission proceedings by giving their names and addresses for the record. For civil penalties exceeding \$500, a corporation shall appear before the Commission by its attorney, unless waived by the Commission for good cause shown and a determination that such waiver is in the public interest. K.S.A. 77-515(c); K.A.R. 82-1-228(d)(2); K.A.R. 82-1-202(a). For civil penalties of \$500 or less, a corporation may appear by a duly authorized representative of the corporation. K.S.A. 2015 Supp. 66-1,142b(e) and amendments thereto.

E. If you do not request a hearing, the payment of the civil penalty is due in thirty (30) days from date of service of this Order. Checks and Money Orders shall be payable to the Kansas Corporation Commission. For credit card payments, include type of card (Visa, MasterCard, Discover, or American Express), account number and expiration date. Payments shall be mailed to the Transportation Division of the Kansas Corporation Commission, 1500 S.W. Arrowhead Road, Topeka, Kansas 66604. *The payment shall include a reference to the docket number of this proceeding.*

F. Failure to pay the \$500 civil penalty within thirty (30) days of the service of this Penalty Order, *see* K.S.A. 66-1,105, and/or failure to comply with the provisions of this Order, may result in suspension of Tect Aerospace Wellington's motor carrier operating authority without further notice. Additionally, the Commission may impose further sanctions to include, but not limited to, the issuance and enforcement of out-of-service and/or cease and desist orders, and any other remedies available to the Commission by law, without further notice.

G. The Commission retains jurisdiction over the subject matter and the parties for the purpose of entering such further orders, as necessary.

BY THE COMMISSION IT IS SO ORDERED.

Emler, Chairman; Albrecht, Commissioner; Apple, Commissioner

Dated: DEC 08 2016



Amy L. Green
Secretary to the Commission

AAL

Order Mailed Date
DEC 09 2016

ATTACHMENT "A"

	US DOT # 69383	Legal: TECT AEROSPACE WELLINGTON INC Operating (DBA): TECT AEROSPACE						
MC/MX #:		State #: [REDACTED]		Federal Tax ID: [REDACTED] (EIN)				
Review Type: Non-ratable Review - CSA								
Scope: Principal Office		Location of Review/Audit: Company facility in the U. S.			Territory:			
Operation Types		Interstate	Intrastate					
Carrier:	N/A		Non-HM	Business: Corporation				
Shipper:	N/A		N/A	Gross Revenue: [REDACTED]		for year ending: 12/31/2015		
Cargo Tank:	N/A							
Company Physical Address:								
[REDACTED]								
Contact Name: Jerry Little								
Phone numbers: (1) [REDACTED]								
E-Mail Address: [REDACTED]								
Company Mailing Address:								
1515 N A STREET WELLINGTON, KS 67152								
Carrier Classification								
Private Property								
Cargo Classification								
Other: Aircraft parts								
Equipment								
		Owned	Term Leased	Trip Leased		Owned	Term Leased	Trip Leased
Truck		6	0	0	Trailer	2	0	0
Power units used in the U.S.: 6								
Percentage of time used in the U.S.: 100								
Does carrier transport placardable quantities of HM? No								
Is an HM Permit required? N/A								
Driver Information								
		Inter	Intra	Average trip leased drivers/month: 0				
< 100 Miles:		0	3	Total Drivers: 3				
>= 100 Miles:				CDL Drivers: 3				





TECT AEROSPACE (TECT AEROSPACE WELLINGTON INC dba)

U.S. DOT #: 69383

State #: [REDACTED]

Review Date:

11/29/2016

Part A

QUESTIONS regarding this report or the Federal Motor Carrier Safety or Hazardous Materials rules may be addressed to the Kansas Corporation Commission at:

1500 SW Arrowhead Road
Topeka, KS 66604
Phone 913-755-1289

This report will be used to assess your safety compliance.

Person(s) Interviewed

Name: Jerry Little

Title: Operations Manager

Name:

Title:



	TECT AEROSPACE (TECT AEROSPACE WELLINGTON INC dba) U.S. DOT #: 69383	State #: [REDACTED]	Review Date: 11/29/2016
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Part B Violations

1 STATE	Primary: 391.51(b)(4) CFR Equivalent: 391.51(b)(4)	Discovered 3	Checked 3	Drivers/Vehicles In Violation	Checked 3
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Description
 Failing to maintain the responses of each State agency to the annual driver record inquiry required by 391.25(a).
Example
 On September 8, 2016 [REDACTED] operated a 1995 GMC , VIN [REDACTED] 519586 GVWR 22440 in combination with a 1999 Fontaine Trailer, VIN [REDACTED] 1586171 GVWR 70775 from [REDACTED] N Washington Wellington, KS to [REDACTED] W. Hillside Wellington, KS. No MVRs prior to October of 2016 in drivers qualification file.

2 STATE	Primary: 391.51(b)(5) CFR Equivalent: 391.51(b)(5)	Discovered 3	Checked 3	Drivers/Vehicles In Violation	Checked 3
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Description
 Failing to maintain a note relating to the annual review of the driver's driving record as required by 391.25(c)(2).
Example
 On September 8, 2016 [REDACTED] operated a 1995 GMC , VIN [REDACTED] 519586 GVWR 22440 in combination with a 1999 Fontaine Trailer, VIN [REDACTED] 586171 GVWR 70775 from [REDACTED] N Washington Wellington, KS to [REDACTED] W. Hillside Wellington, KS. No note relating to the annual review in the DQ file on MVR.

3 STATE	Primary: 391.51(b)(6) CFR Equivalent: 391.51(b)(6)	Discovered 3	Checked 3	Drivers/Vehicles In Violation	Checked 3
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Description
 Failing to maintain a list or certificate relating to violations of motor vehicle laws and ordinances required by 391.27.
Example
 On September 8, 2016 [REDACTED] operated a 1995 GMC , VIN [REDACTED] 519586 GVWR 22440 in combination with a 1999 Fontaine Trailer, VIN [REDACTED] 586171 GVWR 70775 from [REDACTED] N Washington Wellington, KS to [REDACTED] W. Hillside Wellington, KS. No list or certification relating to violations in DQ file on MVR.

Safety Fitness Rating Information:		OOS Vehicle (CR): 0	
Total Miles Operated	14,000	Number of Vehicle Inspected (CR): 0	
Recordable Accidents	0	OOS Vehicle (MCMIS): 0	
		Number of Vehicles Inspected (MCMIS): 0	

Your proposed safety rating is :

This Review is not Rated.

**Safety Management Process Breakdowns and Remedies**

1. FMCSA recently announced planned improvements to the Carrier Safety Measurement System (SMS) which was implemented in December 2010 as part of the Agency's broader Compliance, Safety, Accountability (CSA) initiative. A preview of these improvements is currently available to motor carriers. The system changes are scheduled to be available to the public in July 2012. There will be additional opportunity for public comment on the changes after the preview period ends in July 2012.

The improvements to SMS are based on ongoing analysis and feedback from enforcement personnel, the motor carrier industry, and other stakeholders. The changes more effectively identify and prioritize high-risk and other unsafe motor carriers for enforcement interventions designed to reduce commercial motor vehicle crashes and hazardous materials incidents.

Motor carrier's currently have the ability to preview how the improvements impact their individual safety data in SMS. These improvements include: (1) Changes to the SMS methodology that identify higher risk carriers while addressing industry biases; (2) better applications of SMS results for Agency interventions by more accurately identifying safety sensitive carriers (i.e., carriers transporting people and carriers hauling hazardous materials (HM)), so that such firms can be selected for CSA interventions at more stringent levels; and, (3) more specific fact-based displays of SMS results on the SMS Web site.

The data preview may be found at <http://csa.fmcsa.dot.gov/>. During the data preview period, the Agency requests comments on the impacts of the changes.

2. DRIVER FITNESS BASIC PROCESS BREAKDOWN: Monitoring and Tracking

DESCRIPTION OF PROCESS BREAKDOWN: Tect Aerospace was found to be in violation of failing to maintain the response of each state agency to the annual driver record inquiry, failing to maintain a note relating to the annual review of the driver's driving record and failing to maintain a list or certificate relating to violations of motor vehicle laws and ordinances. Without monitoring the correctness at hand, Tect Aerospace cannot validate if the drivers are qualified to operate the vehicles.

BASIC SPECIFIC RECOMMENDED REMEDIES

Implement Safety Improvement Practices: The following are recommended practices related to Monitoring and Tracking Processes.

- Implement an effective process for monitoring and documenting all drivers' job functions, training, qualifications, renewal dates, disclosed medical conditions, and operational restrictions, including those of drivers on a waiver program or with impairments that may be satisfied by a Skill Performance Evaluation certificate, to ensure that assignments are covered by qualified drivers.
- Review and retain each driver's Motor Vehicle Record (MVR) at least annually to ensure compliance with company policies, Federal regulations, and State and local laws and ordinances related to driver fitness. If a driver seems to have numerous violations, the MVR should be reviewed more often. Random MVR checks in addition to annual checks are also effective. File the MVR in each driver's driver qualification file after review.
- Maintain each driver's investigation history file in a secure location with limited and controlled access for as long as the driver is employed and for three years thereafter.
- Maintain roadside inspection reports, moving violation records, training records, the Commercial Driver's License (CDL), the dispatch schedule, bills of lading, and the medical report to help evaluate the performance of all staff involved in qualifying drivers (dispatchers and managers) and the effectiveness of the policies and procedures.
- Implement a system for keeping accurate records of employee driver fitness training needs, such as entry-level and HAZMAT training, and completed training, via software, a checklist in the driver's file, and/or another appropriate method.
- Evaluate personnel who are monitoring driver fitness performance by making sure they are reviewing driver-assignment and qualification files; applying the performance standards fairly, consistently, and equitably; and documenting the evaluations.
- Regularly evaluate the company's driver fitness-related inspection results via the Federal Motor Carrier Safety Administration's (FMCSA) website at <http://ai.fmcsa.dot.gov/SMS>. Assess violations for process breakdowns and how to remedy them. Use data to help implement an effective process beyond self-reporting to monitor, document, and evaluate compliance with driver-fitness regulations and company policies.





Safety Management Process Breakdowns and Remedies

- When monitoring and tracking any driver-fitness-related issue, always assess whether it is individual or represents a systemic breakdown in one of the Safety Management Processes (Policies and Procedures, Roles and Responsibilities, etc.).

Seek Out Resources:

- You are encouraged to review your company's record at the following website: <http://ai.fmcsa.dot.gov/SMS>. You will need to use your PIN Number that has been provided by the FMCSA.
 - Contact industry associations to get resources and ideas on safety improvement practices from other carriers in the industry.
3. Each motor carrier shall, at least once every 12 month review the driving record of each driver it employs to determine whether that driver meets minimum requirements for safe driving following review of the driver's MVR and his list of violations or is disqualified to drive pursuant to 49 CFR 391.15, as required by 49 CFR 391.54 (b) (6).
 4. At least every 12 months the carrier shall require the driver it employs to prepare or furnish a list of all violations of motor vehicle traffic laws and ordinances as required by 49 CFR 391.27 and prepare a note as required by 391.54 (b) (5)
 5. For all Investigations:
 - **Understand Why Compliance Saves Time and Money:** Compliance with FMCSRs will not only save lives, but also saves your business time and money. Tracking how much your business spends on non-compliance activities can help you understand the many benefits of compliance to your business and why safety is good business.
 - **Document and Follow Through on Action Plans:** Document and follow through on action plans to ensure the actions you are taking are creating improvement in safety management and compliance.
 - **NOTICE:** A pattern and/or repeated violations of the same or related acute or critical regulations (violations of the same Part in Title 49, Code of Federal Regulations) will cause the maximum penalties allowed by law to be assessed under Section 222 of the Motor Carrier Safety Improvement Act of 1999 (MCSIA). A pattern of violations means two or more violations of acute and/or critical regulations in three or more Parts of Title 49, Code of Federal Regulations discovered during any eligible investigation. Repeated violations means violation(s) of an acute regulation of the same Part of Title 49, Code of Federal Regulations discovered in an investigation after one or more closed enforcement actions within a six year period and/or violation(s) of a critical regulation in the same Part of Title 49, Code of Federal Regulations discovered in an investigation after two or more closed enforcement actions within a six year period.
 - **NOTICE:** 49 CFR Part 391.23 requires prospective employers to, at a minimum, investigate a driver's employment information, crash record, and alcohol and controlled substances history from all employers the driver worked for within the previous 3 years.

The Pre-Employment Screening Program (PSP) is a screening tool that assists motor carriers in investigating crash history and roadside safety performance of prospective drivers. The PSP allows motor carriers to purchase 5 years of crash data and 3 years of roadside inspection data from the Federal Motor Carrier Safety Administration's (FMCSA) Motor Carrier Management Information System (MCMIS). Records are available 24 hours a day via Web request. Motor carriers should visit the following website for more information:
<http://www.psp.fmcsa.dot.gov/Pages/default.aspx>

- All motor carriers and truck drivers are needed to fight against terrorism and hijacking. You could be a target. Protect yourself, your trucks, your cargo, and your facilities.

For all Investigations that did not result in a Cooperative Safety Plan:

The KCC requires that you prepare a corrective action letter, addressing the measures taken to correct the violations identified within this report. Submit this letter within 30 days outlining the carrier's updated changes to their policies and procedures regarding all listed violations. Explain in detail how, as a carrier representative, you will rectify these deficiencies and prevent their reoccurrence going forward. Include any supporting documentation and evidence as





TECT AEROSPACE (TECT AEROSPACE WELLINGTON INC dba)

U.S. DOT #: 69383

State #: [REDACTED]

Review Date:

11/29/2016

Safety Management Process Breakdowns and Remedies

indicated in the recommendations above, (example: vehicle inspections performed, proof of drug and alcohol testing in place, etc.) necessary to prove that corrective action has been taken. Mail the letter along with copies of your supporting evidence to:

Kansas Corporation Commission
Attn: Gary Davenport
1500 SW Arrowhead Rd
Topeka, KS 66604-4027

- 6. I acknowledge that the requirements and/or recommendations resulting from this off-site, focused review have been discussed with me and my questions have been answered. I further acknowledge that KCC recommendations only cover the scope of this focused review, and that areas not reviewed by the KCC have not necessarily been endorsed as compliant. I understand that failure to satisfactorily remedy the above-listed requirements, and/or failure to comply with Kansas Motor Carrier Safety Statutes and Regulations could result in the suspension of Tect Aerospace Wellington Inc dba Tect Aerospace . operating authority and/or the impoundment of Tect Aerospace Wellington Inc dba Tect Aerospace.

Carrier Representative

Date

After reviewing these Requirements and/or Recommendations, please sign and date where indicated, and return to the Kansas Corporation Commission, ATTN Verna Jackson, Transportation Division, 1500 SW Arrowhead Rd, Topeka, Kansas 66604-4027, or fax 785-271-3124.



ATTACHMENT "B"

Jared Smith

From: Little, Jerry <jlittle@tectaero.com>
Sent: Wednesday, November 16, 2016 3:28 PM
To: Jared Smith
Subject: RE: Annual Review and Certification of driving record

Jarod, Glen Reeser on 9/8/16 drove the 1995 GMC unit V2011 in combination with the 1999 Trailer V2003 from 2124 N. Washington Wellington, KS to 1515 North "A" street in Wellington, KS to deliver raw material to our machining plant and then returned to 2124 N. Washington Wellington, KS. Our CDL drivers are also you shipping and receiving employees that have dual jobs as a small company. Our 1995 GMC unit V2011 in combination with the 1999 Trailer V2003 make no runs outside of Wellington and major purpose is to deliver material from the warehouse 2124 N. Washington Wellington, KS to our machining facility at to 1515 North "A" street in Wellington, KS and sometimes to our other facility (Shipping & Receiving) at 102 W. Hillside Wellington, KS. So out of their 8 or 10 hour day our CDL drivers might drive the truck 30 minutes to one hour a day based need. This truck itself gets no more then 1,000 miles per year usage. Hope this helps explain better.

Jarod yes I am aware that we need to keep the Annual review of driving record, annual certificate of violations and annual MVR are required to be kept in the drivers file for 3 years and now my HR group that maintains these files is aware of this requirement.

Thanks,

Jerry Little sr. ops manager wellington

TECT Aerospace | 620.359.5003 | jjlittle@tectaero.com
1515 North A Street, Wellington, KS 67152

From: Jared Smith [mailto:j.smith@kcc.ks.gov]
Sent: Wednesday, November 16, 2016 2:13 PM
To: Little, Jerry
Subject: RE: Annual Review and Certification of driving record

The last thing I need to do is document a trip, I thought I could do this with the time documents and DVIRs but I am unable to determine what the destination would be. Looking at the DVIR it appears that on 9/8/16 Glen Reeser operated the 1995 GMC unit V2011 in combination with the 1999 Trailer V2003. If this is correct could you let me know where he traveled to and from.

I am not sure if you are aware or not but for your record the Annual review of driving record, annual certificate of violations and annual MVR are required to be kept in the drivers file for 3 years. Let me know if you have any questions on this or any other parts of the review.

Jared Smith
Special Investigator



Transportation Division
Kansas Corporation Commission

CERTIFICATE OF SERVICE

17-TRAM-229-PEN

I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of first class mail/hand delivered on DEC 08 2016.

AHSAN LATIF, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
Fax: 785-271-3354
a.latif@kcc.ks.gov

JERRY LITTLE, OPERATIONS MANAGER
TECT AEROSPACE WELLINGTON INC.
1515 N A STREET
WELLINGTON, KS 67152
Fax: 620-359-5234
jlittle@tectaero.com

/S/ DeeAnn Shupe
DeeAnn Shupe

Order Mailed Date

DEC 09 2016