MODIFICATION REQUEST COVER SHEET

Name of Filer	KENNETH C. ROGERS
Reporting Period	☐ Annual report ☐ Candidate report - covering previous 12 months
Type of Request	☑ New☐ Renewal with No Change☐ Renewal with Change
Office Held/Sought & Term	Port Commissioner, Port of Seatlle Candidate running in 2015 election, if elected term will expire December, 2020
Application Rule(s)	 Income & Ownership Interest: WAC 390-28-100(b) □ Personal Residence: WAC 390-28-100(d) □ Attorney: WAC 390-28-100(1)(e)(i)) □ Judge / Judicial Candidate: WAC 390-28-100(1)(e)(ii)) □ Spousal: WAC 390-28-100(1)(e)(iv)) □ Other: WAC 390-28-100(1)(a)(c)
Supporting Documents (attached)	☑ Current F-1☑ Modification Application☐ Prior order (if renewal)
Reason(s) for Modification (as stated by filer)	 Mr. Rogers is requesting a reporting modification that would exempt him from disclosing the business and governmental customers that paid \$12,000 or more during the previous 12 months, to Delta Air Lines, Inc. of which he is a shareholder-elected member of the board of directors and employee. Mr. Rogers stated that he has no ownership interest in the company and is not involved in the day to day operations. Mr. Rogers stated that Delta Air Lines, Inc., has approximately 80,000 employees, has annual sales of approximately \$40 billion and more than 170 million customers. Mr. Rogers stated that there are several hundred thousand customers that would meet the reporting threshold and be subject to disclosure. Mr. Rogers stated that Delta Air Lines, Inc. is a publicly traded company and that its annual report and filings with the SEC are publically available. Mr. Rogers stated that the compiling a list of the reportable business customers of Delta Air Lines, Inc. would cause a significant administrative burden. In addition, detailed information concerning governmental contracts and income is not readily accessible.
Other Issues	Mr. Rogers disclosed that if he is elected to office, that by the date his term would begin he will no longer be employed or affiliated with Delta Air Lines, Inc., nor will be be a member of the board of directors.
Staff Recommendations	Staff recommends approval of the modification.