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GORDON L. WALGREN
Of counsel

September 11, 2003

ANNE M. MONTGOMERY
MARTIN D. McLEAN

Ms. Carole Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250


**Re: Application of Northland Investments, LLC
d/b/a Call and Haul
No. TG-030811
GA-079176**

Dear Ms. Washburn:

Enclosed for filing in the captioned matter are an original and three copies of **Protest of Washington Refuse & Recycling Association** as well as **Protest of Sunshine Disposal, Inc.**

Very truly yours,

RYAN SELLS UPTGRAFT, INC. P.S.



Cheryl L. Sinclair
Secretary to
JAMES K. SELLS

encs.

cc: Washington Refuse and
Recycling Association/enc.
Sunshine Disposal, Inc./enc.

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STATE OF WASH.
UTIL. AND TRANSP.
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BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

In Re Application of
NORTHLAND INVESTMENTS LLC
d/b/a CALL AND HAUL

NO. GA 079176
TG 030811

PROTEST OF WASHINGTON REFUSE
AND RECYCLING ASSOCIATION

COMES now Protestant, Washington Refuse & Recycling Association (WRRRA), c/o JAMES K. SELLS, 9657 Levin Rd. N.W., Suite 240, Silverdale, Washington 98383, and protests the above-referenced application in which the following authority is sought:

Solid Waste Collection Service consisting of yard waste and construction and demolition debris in Spokane County.

In doing so, Protestant alleges and prays as follows:

1. WRRRA is a non-profit Washington corporation organized under and existing by virtue of the laws of the State of Washington. The membership of WRRRA consists of holders of Washington Utilities and Transportation Commission certificates to collect and haul solid waste in the State of Washington. WRRRA is a trade association within the meaning of the laws of the State of Washington and the rules and regulations of the Washington Utilities and Transportation Commission, and a "person" as defined by WAC 480-09-410(1) and WAC 480-70-026.

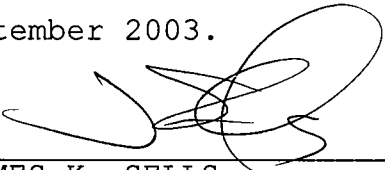
2. This protest is filed on behalf of WRRRA, its members at large and on behalf of that member or those members who hold

1 authority to collect and transport solid waste within the
territory specified in the above-referenced application.

2 3. Members of WRRRA are presently serving the areas
3 requested in the above-referenced application pursuant to
4 certificates of public convenience and necessity issued by the
5 Washington Utilities and Transportation Commission. Those
6 certificate holders are ready, willing and able to provide any
7 service necessary within the subject area. The granting of this
8 application would deprive those certificate holders of revenue
9 from the carriage of materials to which they are certificated to
10 carry and are able to do so. The granting of this application
Commission.

11 WHEREFORE, Protestant prays the subject application be
12 dismissed; or in the alternative, that the matter be set for
13 hearing. If the matter is set for hearing, Protestant WRRRA would
14 call one witness whose testimony would take approximately one
hour.

15 DATED this 8 day of September 2003.

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17 _____
18 JAMES K. SELLS
19 WSBA No. 6040
20 Attorney for Protestant
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CERTIFICATE OF SERVICE

1 I hereby certify that on this day a true copy of the
2 foregoing Protest of Washington Refuse and Recycling Association
3 was served by first class mail, postage prepaid, on:

4 Northland Investments LLC
5 d/b/a Call and Haul
6 1923 E. Saint Maries
7 PO Box 3058
8 Coeur D'Alene, ID 83816

9 I swear under the penalty of perjury of the laws of the
10 State of Washington that the foregoing is true and correct.

11 DATED: September 11th, 2003.

12 
13 Cheryl L. Sinclair