



Seattle-Tacoma International Airport
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Seattle, WA 98168

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www.portseattle.org

December 15, 2010

Mr. David Danner, Executive Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-7250

Re: **Docket No. TC-101813**
Petition to Intervene

2010 DEC 15 PM 2:55

Dear Mr. Danner:

The Port of Seattle formally requests to intervene in the above-referenced docket. As required by WAC 480-07-355, the Port makes the following statements:

1. Petitioners Name and Address:

Port of Seattle
Seattle-Tacoma International Airport
17801 International Blvd.
Seattle, WA 98158

2. Petitioner's Interest in Proceeding:

The Port of Seattle is the operator of Seattle-Tacoma International Airport (the "Airport"). The Airport is one of the fixed end-points from which the service subject to the Transfer of Certificated Authority relates.

3. Petitioner's Position with Respect to the Matter:

The Port of Seattle questions whether the transfer of (a portion of) Certificate C-819 currently held by Evergreen Trails, Inc. to Shuttle Express Inc. is in the best public interest.

The Port of Seattle has worked closely for many years with Shuttle Express, and it provides excellent shared ride services to and from the Airport under its WUTC Certificate C-975. Our purpose in this communication is to inquire of the Commission whether it would be in the best interest of the travelling public to allow an open, competitive process for the operation of the downtown airporter service subject to Certificate C-819 rather than simply transfer that portion of the certificate from one company to another. The Port has undertaken such a process for operation of other ground transportation businesses at the Airport and would gladly participate in or oversee such a process with respect to this service.

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Through open competition, the transportation operator able to provide the best, most efficient service for Airport customers to and from the Airport and Seattle hotels could be selected. It would also provide an opportunity for the Port to introduce 'green fleet' requirements into this service, which requirements would provide significant environmental benefit to the region but which benefits are not currently contemplated by the State's auto transportation statute.

The Port will gladly present further public testimony on the issue raised here if requested by the Commission.

4. Whether Petition Proposes to Broaden Issues subject to the Proceeding:
The Port does not propose to broaden the issues in the subject proceeding.

5. Name and Address of Petitioner's Representative:
Paul M. Grace
Senior Airport Operations Manager / Landside
Seattle-Tacoma International Airport
17801 International Blvd.
Seattle, WA 98158
206-787-7235
206-787-4837 (fax)
Grace.p@portseattle.org

We appreciate your attention to this matter and look forward to your careful consideration of our comment on the above-referenced docket item.

Sincerely


Paul M. Grace
Senior Airport Operations Manager / Landside

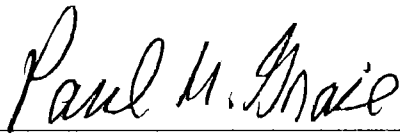
Cc: Shuttle Express, Inc. (via fax / 425-981-7071)
d/b/a Shuttle Express; Go Shuttle Express; Limos by Shuttle Express
Attn: John Rowley
800 SW 16th St.
Renton, WA 98057

Evergreen Trails, Inc. (via fax / 206-299-9392)
d/b/a Evergreen Trailways; Gray Line of Seattle
Attn: Joshua Gatherum
4500 W. Marginal Way SW
Seattle, WA 98106

Certificate of Service

I hereby certify that I have this day served this document upon the parties listed below via telefacsimile. I have also sent this document to the parties and the Commission via U.S. mail.

Dated this 15th day of December, 2010.



Paul M. Grace
Senior Operations Manager / Landside
Port of Seattle

Parties served:

Shuttle Express, Inc.
d/b/a Shuttle Express; Go Shuttle Express; Limos by Shuttle Express
Attn.: John Rowley
800 SW 16th St.
Renton, WA 98057

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