

BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

In the Matter of the Investigation of

SANI MAHAMA MAUROU d/b/a
SEATAC AIRPORT 24

For Compliance with WAC 480-30-221

DOCKET TC-152296

COMMISSION STAFF'S MOTION
FOR CONTINUANCE OF BRIEF
ADJUDICATIVE PROCEEDING

1 On February 9, 2016, the Washington Utilities and Transportation Commission
("Commission") issued a Notice of Intent to Cancel Certificate as an Auto Transportation
Carrier and Notice of Brief Adjudicative Proceeding; Setting Time for Oral Statements in
2 Docket TC-152296, In the Matter of the Investigation of Sani Mahama Maurou d/b/a
SeaTac Airport 24 For Compliance with WAC 480-30-221 ("Notice"). The Notice set the
Brief Adjudicative Proceeding ("BAP") for March 1, 2016, at 9:30 a.m., and also noted that
Administrative Law Judge ("ALJ") Rayne Pearson would preside during the proceeding.

2 Pursuant to WAC 480-07-385, Commission Staff ("Staff") files this Motion for
Continuance of the BAP currently scheduled for March 1, 2016, at 9:30 a.m. and requests
that the BAP be continued until either March 7 or March 8, 2016, at 9:30 a.m.

3 WAC 480-07-385 requires that a party requesting a continuance must show "good
cause for the continuance and [that] the continuance will not prejudice any party or the
commission." Staff believes that good cause exists in this instance and that a continuance
will not prejudice any party or the Commission.

4 Unavoidably, Staff's investigators will be away from Olympia, WA, attending a
mandatory training on March 1, 2016, (as well as on March 2 and March 3, 2016) that is
required by the Federal Motor Carrier Safety Administration. At least one of the
investigators attending this mandatory training is a necessary witness for Staff in this case as

the investigator has first-hand knowledge of Staff's investigation and compliance review relating to the proposed unsatisfactory safety rating for Sani Mahama Maurou d/b/a SeaTac Airport 24 ("the Company") and Staff expects this to be important for informing the Commission in this matter.

5 Additionally, granting Staff's motion and continuing the BAP until either March 7, 2016 or March 8, 2016, will not prejudice the Company because the proposed continuance dates would coincide with the 45 days afforded to the Company to request a change to its proposed unsatisfactory safety rating (*see* 49 CFR 385 as adopted by reference in the Commission's rules at WAC 480-30-999(2) and referenced in WAC 480-30-221 (Vehicle and driver safety requirements)).

6 A continuance in this matter will not prejudice any party or the Commission. It is Staff's belief that a continuance would benefit the Commission by enabling Staff to present testimony through its investigators with first-hand knowledge of the circumstances surrounding this case, and would also benefit the Company for the reasons noted above.

7 Staff, therefore, respectfully moves for a continuance of the BAP in this matter currently set for March 1, 2016, at 9:30 a.m. and requests that the BAP be continued until either March 7 or March 8, 2016, at 9:30 a.m.

DATED February 10, 2016.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General



ANDREW J. O'CONNELL
Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff