

The following are comments I have regarding the Discussion Draft #1 of the solid waste/medical waste rules:

WAC 480-70-011 This would seem a loophole that would allow dump truck operators and who knows who else to legally haul "occasional" loads of CDL. I think this section is opening an unnecessary can of worms.

WAC 480-70-026 (9) and (16) Is a "Class C Company" a new definition? Is "Competitive Commercial Service" a proposed new type of service? It is very unclear to me what the purpose of these definitions are. I think they should be more clearly defined.

WAC 480-70-116 This section clearly would undermine the existing system. It seems that larger companies would be able to take advantage of this rule very easily by offering "flexible schedules" and "specialized equipment" not supplied by the existing company. For example: my company does not use front loaders or automated trucks. Does this mean another company can come in and provide a service with different "specialized equipment" (front loader or automated trucks) and a "flexible schedule" at rates lower than mine that customers "need"? And of course only my larger non fringe area customers would need this service. I am strongly opposed to this section.

WAC 480-70-296 Item (6) I think it would be better to use the word "offer" instead of "provide" regarding "A company must provide a copy of the commissions consumer brochure to each new applicant for service" Most customers will not take the time to read the brochure and will call if they have questions regarding their service. Making it mandatory to give these brochures out only creates more paper to recycle. Item (7) I also don't believe to place a mandatory requirement on companies to provide an annual brochure to customers is necessary. Any good business is going to already be providing brochures if requested and answering consumers questions if the customer calls. This system targets the customers that really want the information and cuts down on printing information that merely gets thrown away.

Sincerely,

Mike Johnson
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