**BEFORE THE WASHINGTON UTILITIES AND**

**TRANSPORTATION COMMISSION**

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| IN RE: APPLICATION OF  PACIFIC NORTHWEST TRANSPORTATION SERVICES D/B/A  CAPITAL AEROPORTER;  AIRPORT SHUTTLE  FOR PERMANENT AUTO  TRANSPORTATION AUTHORITY | DOCKET TC-111619  PROTEST AND REQUEST FOR ADJUDICATIVE PROCEEEDING AND HEARING OF  SHUTTLE EXPRESS |

* 1. Shuttle Express, Inc. d/b/a Shuttle Express (“Shuttle Express” or “Protestant”) protests the above captioned application of Capital Aeroporter; Airport Shuttle (“Applicant”) under WAC 480-30-032. Shuttle Express requests that the WUTC commence an adjudicative proceeding and set this application for hearing for the reasons identified in this protest.
  2. The Protestant is:

Shuttle Express

800 S.W. 16th Street

Renton, WA 98057

Phone: (425) 981-7070

Attn: John Rowley, Jr.

* 1. The name and address of Shuttle Express’ attorney is:

Brooks E. Harlow

Lukas, Nace, Gutierrez & Sachs, LLP

8300 Greensboro Drive, Suite 1200

McLean, VA 22102

Phone: (703) 584-8680

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* 1. Shuttle Express is an auto transportation company operating under the authority issued by the WUTC in Permit C-975. See attachment. Under this certificate, Shuttle Express has the authority to provide door to door and scheduled service within the city of Seattle. Shuttle Express operates a fleet of approximately 100 vans and 15 buses.
  2. Shuttle Express believes that a grant of Applicant’s application is not in the public interest and is not required by the public convenience and necessity. Applicant requests authority to provide (1) passenger service between Seattle-Tacoma International Airport and Seattle Waterfront and (2) passenger service between points in Grays Harbor, Lewis, Mason, Thurston, Pierce and King counties and the Seattle Waterfront via Seattle-Tacoma International Airport. Shuttle Express already provides satisfactory service along these routes. There is no public need for the Applicant’s proposed, duplicative service, as Shuttle Express’s existing equipment is not fully utilized and is available to provide additional service should the need and opportunity arise.
  3. If the WUTC sets this matter for hearing, Shuttle Express will appear, submit evidence and present witnesses at the hearing in support of this protest.
  4. Respectfully submitted this 16th day of September, 2011

LUKAS, NACE, GUTIERREZ & SACHS, LLP



Brooks E. Harlow

WSB No. 11843

*Attorney for SHUTTLE EXPRESS, INC.*