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RYAN SELLS UPTEGRAFT, INC. P.S.

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JAMES E. RYAN
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ANNE M. MONTGOMERY

December 30, 2004

TODD A. BUSKIRK
EMILY M. BUTCHER
GORDON L. WALGREN
Of Counsel

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

RECEIVED
REGISTRATION DIVISION
05 JAN -3 AM 9:42
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Re: Application of Sureway Systems, Inc.
No. TG-042089**

Dear Ms. Washburn:

Enclosed for filing you will find an original and three copies of Protest of Washington Refuse and Recycling Association.

Very truly yours,

RYAN SELLS UPTEGRAFT, INC. P.S.



Cheryl L. Sinclair
Secretary to
JAMES K. SELLS

encs.

cc: WRRRA w/enc.
Consolidated Disposal Services w/enc.
Pullman Disposal Services w/enc.
Mr. Steve Johnson w/enc.

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In re Application GA079331 of
SUREWAY SYSTEMS, INC.,
For a Certificate of Public
Convenience and Necessity

DOCKET NO. TG-042089
PROTEST OF WASHINGTON REFUSE
AND RECYCLING ASSOCIATION

COMES NOW Protestant Washington Refuse and Recycling Association (WRRRA), c/o JAMES K. SELL of Ryan Sells Uptegraft, Inc. P.S., 9657 Levin Road NW, Suite 240, Silverdale, WA 98383, and protests the above-referenced application, in which the following authority is sought:

SOLID WASTE COLLECTION consisting of biomedical waste in Adams, Asotin, Benton, Columbia, Franklin, Garfield, Grant, Klickitat, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman and Yakima Counties.

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 "party" as defined by WAC 480-07-340 and a "person" as defined by WAC 480-70-041.

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CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the foregoing PROTEST OF WASHINGTON REFUSE AND RECYCLING ASSOCIATION was served by first class mail, postage prepaid, on:

Sure-Way Systems, Inc.
ATTN: Gary Chilcott
PO Box 899
Deer Lodge, MT 59722

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

DATED this 20th day of December 2004 at Silverdale, Kitsap County, Washington.


Cheryl L. Sinclair

PULLMAN DISPOSAL SERVICE, INC.
P.O. BOX 619
PULLMAN, WA 99163

PERMIT NO.
G-42
D-4

GARBAGE AND WASTE MATERIAL COLLECTION SERVICE In the City of Pullman and in that portion of Whitman County described as follows: Beginning at the Northeast corner of Section 24, T. 15 N., R. 45 E.; thence west along the north line of said Section 24 extended to the Northwest corner of Section 22, T. 15 N., R. 44 E.; thence south along the west line of said Section 22 extended to the Southwest corner of Section 22, T. 14 N., R. 44 E.; thence east along the south line of said Section 22 to the Southeast corner of said Section 22; thence, south along the extended east line of said Section 22 extended to the Southwest corner of Section 35, T. 14 N., R. 44 E.; thence east along the 1*** south line of said Section 35 extended to the Southeast corner of Section 33, T. 14 N., R. 45 E.; thence north along the east line of said Section 33 extended to the Southwest corner of Section 22, T. 14 N., R. 45 E.; thence east on the south line of said Section 22 extended to the Southeast corner of Section 24, T. 14 N., R. 45 E.; thence north along the east line of said Section 24 extended to the Northeast corner of Section 24, T. 15 N., R. 45 E., the point of beginning.

MVG No. 869

01-31-1977

CONSOLIDATED DISPOSAL SERVICES INC
PO BOX 1154
EPHRATA, WA 98823-1154

PERMIT NO.
G-190
D-6

GARBAGE AND REFUSE COLLECTION SERVICE in that portion of Grant and Adams Counties described as follows: Beginning at the S.E. corner of

Section 24, T. 14 N., R. 27 E.; thence west along the south line of said Section 24 extended to the east bank of the Columbia River; thence following said river bank in a northerly and westerly direction to the point of intersection with the west line of Section 31, T. 14 N., R. 26 E.; thence north along the west line of said Section 31 extended to the S.E. corner of Section 12, T. 16 N., R. 25 E.; thence west along the south line of said Section 12 extended to the S.W. corner of Section 8, T. 16 N., R. 24 E.; thence north along the west line of said Section 8 extended to the S.E. corner of Section 30, T. 18 N., R. 24 E.; thence west along the south line of said Section 30 extended to the S.W. corner of Section 28, T. 18 N., R. 23 E.; thence north along the west line of said Section 28 extended to the N.W. corner of Section 28, T. 19 N., R. 23 E.; thence east along the north line of said Section 28 extended to the S.W. corner of Section 19, T. 19 N., R. 24 E.; thence north along the west line of said Section 19 extended to the S.E. corner of Section 1, T. 19 N., R. 23 E.; thence west along the south line of said Section 1 extended to the S.W. corner of Section 5, T. 19 N., R. 23 E.; thence north along the west line of said Section 5 to the N.W. corner of said Section 5; thence west along the extended north line of Section 5 to the east bank of the Columbia River; thence north along the east bank of the Columbia River to the intersection with the west line of Section 18, T. 20 N., R. 23 E.; thence north along the west line of said Section 18 extended to the N.W. corner of Section 18, T. 21 N., R. 23 E., (also the Douglas-Grant County Line); thence east and north along the county line to the N.W. corner of Section 6, T. 22 N., R. 24 E.; thence east along the north line of said Section 6 extended to the N.E. corner of Section 1, T. 22 N., R. 30 E.; thence south along the east line of said Section 1 extended to the N.W. corner of Section 6, T. 19 N., R. 30 E.; thence east along the north line of said Section 6 extended to the N.E. corner of Section 1, T. 19 N., R. 32 E.; thence south along the east line of said Section 1 extended to the S.E. corner of Section 36, T. 15 N., R. 32 E.; thence west along the south line of said Section 36 extended to the N.E. corner of Section 1, T. 14 N., R. 27 E.; thence south along the east line of said Section 1 extended to the S.E. corner of Section 24, T. 14 N., R. 27 E.; the point of beginning. (excluding Sections 28, 29, 32, 33 of T. 19 N., R. 24 E., and Sections 5 and 6 of T. 18 N., R. 24 E.)

EXCLUSION: Service is not authorized in the City of Moses Lake.

The following authority was obtained by transfer of Certificate No. G-165, standing in the name of Dahl-Smyth, Inc.

GARBAGE AND REFUSE COLLECTION SERVICE in that portion of Grant County described as follows: Commencing at the S.W. corner of Sec. 35 T. 23 N., R. 26 E.; thence Northerly following the Grant County Westerly boundry extended to the N.W. corner of Sec. 6, T. 26 N., R. 28 E.,

thence East along the North line of Township 26 N. extending to the N.E. corner of Sec. 1, T. 26 N., R. 30 E., thence South along the East line of said Section 1 extended to the S.E. Corner of Sec. 36, T. 23 N., R. 30 E.; thence West along the South line of said Section 36 extended to the S.W. Corner of Sec. 35, T. 23 N., R. 26 E. the point of beginning.