

Shuttle Express

Vans • Sedans • Limos • Buses • Tours

February 22, 2011

Mr. David W. Danner
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P.O. Box 47259
Olympia, WA 98504-7250

Re: Formal Complaint, TC -110230

Dear Mr. Danner,

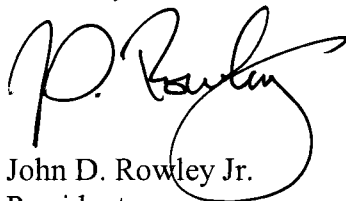
We disagree with Mr. Asche's assertion that we are expanding our territory by adding stops in our tariff not within our certificated authority. We assert these stops and zip codes are within our certificated, door to door authority and therefore, feel we have the right to service this territory with our door to door service.

Our certificate clearly states "Between: The Seattle-Tacoma International Airport ...and points within a 25 mile radius of these airports, excluding points in Kitsap and Pierce counties." Defining those points specifically in Pierce County further, it lists excluded points in Pierce county: "Between: The Seattle-Tacoma International Airport and points in Pierce county, excluding service to or from Fort Lewis Army Base, McChord Air Force Base, Pearls by the Sea in Purdy, Safeway at Pt. Fosdick Square in Gig Harbor and Denny's Restaurant at 5924 – 6th Avenue in Tacoma." We assert: Since there are Pierce County points listed as exclusions, the remainder of Pierce County within the 25 mile radius from Sea-Tac is within our territory.

Further, I consulted with WUTC staff to ensure our tariff accurately reflected our certificated territory. As a result of my work with staff, and by means of their historical knowledge, I submitted a correction to my initial understanding, removing all Kitsap County points and zip codes: There was not a paragraph within our certificate reflecting any declaration of Kitsap County or specific point exclusions within Kitsap County, as there was for Pierce County.

This complaint has no merit. We have filed our tariff according to the authority given us by the Commissioners and the W.U.T.C. and ensured this by consulting with staff ahead of and during submission of our tariff. Accordingly, Shuttle Express denies all allegations of the complaint.

Sincerely,



John D. Rowley Jr.
President
Shuttle Express

2011 FEB 23 AM 9:56