

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

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 PROCEEDING
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.

3. 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
Facsimile: (703) 584-8696
Email: bharlow@fcclaw.com

4. 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.
5. 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.
6. 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.
7. Respectfully submitted this 16th day of September, 2011

LUKAS, NACE, GUTIERREZ & SACHS, LLP



Brooks E. Harlow
WSB No. 11843

Attorney for SHUTTLE EXPRESS, INC.