

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In re Application TC-143691

SPEEDISHUTTLE WASHINGTON,
LLC D/B/A SPEEDISHUTTLE
SEATTLE

For a Certificate of Public Convenience
and Necessity to Operate Motor Vehicles
in Furnishing Passenger and Express
Service as an Auto Transportation
Company

DOCKET TC-143691

PACIFIC NORTHWEST
TRANSPORTATION SERVICES, INC
D/B/A CAPITAL AEROPORTER'S
PETITION FOR ADMINISTRATIVE
REVIEW OF INITIAL ORDER 02 –
OVERRULING OBJECTIONS TO
APPLICATION FOR NEW AUTHORITY

1 Objector Pacific Northwest Transportation Services Inc. d/b/a Capital Aeroporter
Airport Shuttle (“Capital” or “Objector”) respectfully seeks through Petition and Response
to Initial Order 02 – Overruling Objections to Application for New Authority of January 22,
2015, for Administrative Review.

2 Speedishuttle Washington, LLC. (“Speedishuttle” or “Applicant”) presented no
actual customer statement or interested customer statement of “public need” or “public
convenience and necessity” per WAC 480-30-140, in presented evidence or during
testimony and therefore should be denied approval of application .

3 Applicant proposes use of 5 vans which does not adequately supply the need it
suggests, based upon growth and population; did not offer any evidence of any specific;
customer denial of service, “statements or testimony”, or complaint against Objectors
“because the company (companies) fails to meet any of the satisfaction criteria identified
(same service)” (WAC 480-30-140(3c). Therefore, application should be denied.

4 Applicant proposes supplying an airport greeter to all arriving passengers, which
would not be economically sustainable with proposed fares.

5 Page 6, Paragraph 19, Sentence 2 of the Initial Order is inaccurate. Replacement of
verbiage should be as follows: **Capital Aeroporter. “Capital offers 24 Hour Direct Door
to Door Service.”** The last sentence of the paragraph should be replaced with **“Given the
totality of these factors, we find that Capital Aeroporter does provide substantially the
same service Speedishuttle seeks to provide;”**.

6 Paragraph 28 needs to be rewritten to uphold Capital’s Objection to the Application
and remove the King County subarea (subregion) served under C-862.

7 Service differentiation of Auto Transportation Services (WAC 480-30-140(1b)) are
not determined by the presence of an Airport Greeter, TVs on board, or a 20-minute wait
versus a 30-minute wait time. The “type, means, and methods” of service are only to be
distinguished by the actual Auto Transportation Service provided to the consumer. Type of
services to be distinguished from one another would be Door-to-Door Service versus
Scheduled Service. Means and methods of providing the service providing distinction from
one another would be; vehicles used, number of stops, where customers are picked
up/dropped off, wait time (10 minutes hardly a fair distinction).

8 The Application and Objection process through Brief Adjudicative Proceeding (BAP)
was to focus solely on whether existing certificate holders are; authorized to provide the
same service, provide the same service and provide it to the satisfaction of the Commission.
The Applicant was continually allowed to question and demand details into actual Fitness of
the existing certificate holders, while the existing certificate holders’ questions regarding
fitness of Applicant were continually objected/sustained during the Proceeding. It seems, in
this particular case, that a more appropriate forum for Objection to Application should have
been a full, Regular Adjudicative Hearing.

9

Finally, Capital respectfully requests the Administrative Review to consider all points brought forth in this matter, and to change the statements and modify the Initial Order 02, accordingly.

DATED this 11th day of February, 2015.

RESPECTFULLY SUBMITTED,

By _____
John Fricke
johnf@capair.com
Vice President—Operations, Capital Aeroporter

CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2015, I caused to be served the original and one (2) copies of the foregoing document to the following address via first class mail, postage prepaid to:

Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
Attn.: Records Center
P.O. Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

I certify I have also provided to the Washington Utilities and Transportation Commission's Secretary an official electronic file containing the foregoing document via email to: records@utc.wa.gov

and an electronic copy via email and first class mail, postage prepaid, to:

<p>Julian Beattie Assistant Attorney General Washington Utilities and Transportation Commission 1400 S. Evergreen Park Dr. SW PO Box 40128 Olympia, WA 98504-0128 (360) 664-1192 Email: jbeattie@utc.wa.gov</p>	<p>Rayne Pearson Administrative Law Judge 1300 S. Evergreen Park Drive S.W. P.O. Box 47250 Olympia, WA 98504-7250 (360) 664-1160 rpearson@utc.wa.gov</p>
<p>Dave Wiley Williams, Kastner & Gibbs, PLLC Two Union Square 601 Union Street, Suite 4100 Seattle, WA 98101 Email: dwiley@williamskastner.com</p>	<p>John Fricke Pacific Northwest Transportation Services, Inc. d/b/a Capital Aeroporter Airport Shuttle PO Box 2163 Olympia, WA 98507-2163 (360) 292-7680 johnf@capair.com</p>
<p>Bruce Winchell Mills Meyers Swartling, P.S. 1000 Second Avenue, 30th Floor Seattle, WA 98104 Email: bwinchell@millsmeyers.com</p>	

John Fricke