***Bench Request No. 3****:*

*In the event of a labor disruption, does Rabanco have a similar practice of prioritizing “critical” facilities during temporary collection services? How does Rabanco define these “critical” facilities?*

**Response by Rabanco Ltd.**:

Rabanco does prioritize certain facilities during “temporary” labor disruption circumstances (as opposed to the term “temporary collection services,”) above (*See also*, Attachment 1 to Response to Bench Request No. 4), *infra*, for discussion of critical facilities. Generally and, without limiting our response, “critical facilities” would be hospitals, nursing homes and commercial establishments where progressively concentrated accumulation of wastes could increase public health and safety concerns.

Response: John Lawler, Northwest Area Controller

Date: November 25, 2013

***Bench Request No. 4****:*

*Please indicate whether Rabanco also has a contingency plan in place should a labor disruption occur. If so, please provide a copy of that plan.*

**Response by Rabanco Ltd.**:

Yes, in spring 2013 we developed a contingency plan for use in Washington for short-term labor disruptions and provided it to the Business Practices Section of the Commission before suffering a one-day sympathy walkout in April, 2013.

We caution that this attached plan was expressly preliminary and was evolving as this proceeding unfolded. Some of the elements/features of the plan have been modified and revised as reflected in the Item 30 verbiage referred to in Rabanco’s August 16 Statement filed in this matter as the “Industry Proposal.” In addition, work on the “separate operating plan for potential long-term labor disruptions” referenced in the last paragraph of the attached plan was in fact suspended due to the realization that the Commission would be clarifying criteria for such plans in its Order and that it was therefore appropriate to await the entrance of that Order.

Response: John Lawler, Northwest Area Controller

Date: November 25, 2013