Law Offices of

RYAN SELLS UPTEGRAFT, INC. P.S.

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March 15, 2007

CHERYL K. RIFE
CHERRY DAVIS
MARY SPAUN
GORDON L. WALGREN, Of Counsel

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

Re: Docket No. TC-061847

Application of Roman Solutions, LLC d/b/a Rocket Transportation

Dear Ms. Washburn:

Enclosed is an original and 12 copies of Protest of Heckman Motors, Inc., d/b/a Olympic Bus Lines.

Very truly yours,

RYAN SELLS UPTRORAFT, INC. P.S.

JAMES K. SELLS

JKS:cs

enc.

cc: Heckman Motors, Inc. w/enc.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

IN RE APPLICATION OF ROMAN SOLUTIONS, LLC d/b/a ROCKET TRANSPORTATION

for Certificate of Public Convenience and Necessity to Provide Passenger and Express Service DOCKET NO. TC-061847

PROTEST OF HECKMAN MOTORS, INC., d/b/a OLYMPIC BUS LINES

COMES NOW Heckman Motors, Inc. d/b/a Olympic Bus Lines, and protests the above-referenced application, and in doing so alleges and prays as follows:

- 1) Protestant is an auto transportation company providing services pursuant to WUTC Permit No. C-992, a true copy of which is attached hereto and by this reference made a part hereof.
- 2) Protestant's business address is 111 East Front Street, Port Angeles, Washington 98362. Protestant is represented herein by James K. Sells, attorney, whose address, telephone number, fax and e-mail are:

James K. Sells

Ryan Sells Uptegraft, Inc. P.S.

9657 Levin Road NW, Suite 240

Silverdale, WA 98383

Phone: 360.307.8860

Fax: 360.307.8865

e-mail: jimsells@rsulaw.com

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- 3) The above-referenced application seeks service which would duplicate service currently being provided by Protestant. There is not sufficient need for additional service, and the granting of such service would not be in the public interest and would be violative of the laws and regulations governing Auto Transportation Companies in Washington state.
 - 4) Applicant is not fit, willing or able to provide the requested service.
- 5) There is no restrictive amendment to the application that would satisfy Protestant's objections.

WHEREFORE, Protestant prays the application be dismissed; or in the alternative be set for hearing, at which Protestant would call two to three witnesses whose testimony would take one-half to one full day.

DATED this 15 day of March 2007.

JAMES K. SELLS
WSBA No. 6040
Ryan Sells Uptegraft, Inc. P.S.
9657 Levin Rd. NW, Suite 240
Silverdale, WA 98383
Attorneys for Protestant

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CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the foregoing PROTEST OF HECKMAN MOTORS, INC. d/b/a OLYMPIC BUS LINES was served by first class mail, postage prepaid, on:

Roman Solutions, LLC dba Rocket Transportation 260643 Hwy. 101 Sequim, WA 98382

Brooks Harlow Miller Nash, LLP 4400 Two Union Square 601 Union St. Seattle, WA 98101

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

DATED this day of March 2007 at Silverdale, Kitsap County, Washington.

Cheryl L. Sinclair

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

For the Operation of Motor Propelled Vehicles

pursuant to the provisions of Chapter 81 RCW

THIS IS TO CERTIFY that authority is granted to operate as a MOTOR CARRIER in the transportation of the commodities and in the territory described herein to

HECKMAN MOTORS, INC. d/b/a OLYMPIC BUS LINES 111 EAST FRONT STREET PORT ANGELES, WA 98362

PERMIT NOT C-992

PASSENGER SERVICE

BETWEEN: Port Angeles and Seattle, with an intermediate stop at Sequi-

BETWEEN: Port Angeles and the Seattle-Tacoma International Airport with an intermediate stop at Sequim.

BETWEEN: Port Townsend and Hood Canal Bridge with connections to Seattle and the Seattle Tacoma International Airport via Hwy. 20 in Port Townsend southbound to Hwy. 19, southbound to Hwy. 104, eastbound to Hood Canal Bridge. Connecting with buses at Hood Canal Bridge and return to Port Townsend by the same route.

No service shall be rendered between Seattle and the Seattle-Tacoma International Airport.

PASSENGER SERVICE

BETWEEN: Port Angeles, Sequim, Discovery Bay, Kingston, Edmonds, and Seattle.

No service shall be rendered between Seattle and Seattle-Tacoma International Airport, Edmonds and Seattle, and Edmonds and Seattle-Tacoma International Airport.

The holder of this certificate may operate an 8 foot 11 inch length by 4 foot width by 5 foot 7 inch height trailer when such a trailer is used to carry passenger luggage and is towed by a vehicle in which passengers are being transported.

TC-041593

SERVICE DATE

09-27-05

OCT - 4 2005



WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

By Caidle & Charle