

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Cruising Transportation Co. LLC

d/b/a Cruising Shuttle

Applicant.

DOCKET NO. TC-170681

OBJECTION OF SHUTTLE
EXPRESS, INC.

1 The undersigned counsel files this objection on behalf of the following existing certificate holder:

Shuttle Express, Inc.
800 SW 16th St.
Renton, WA 98057
Attn.: Jimmy Sherrell

2 Pursuant to WAC 480-30-116, Shuttle Express respectfully objects to the application for permanent auto transportation authority filed in this Docket TC-170681 by Cruising Transportation Company LLC d/b/a Cruising Shuttle, 32169 33rd Ave SW, Federal Way, WA 98023 (“Applicant”). Applicant has requested a certificate of public convenience and necessity to provide service described as: “Door-to-door service, by reservation only, to and from points within King, Snohomish, Pierce and Thurston County, Pier 66, Pier 91 and Seattle-Tacoma International Airport..”

3 Shuttle Express is the named holder under existing Certificate of Public Convenience and Necessity number C-975 (copy attached) as provided under the provisions of RCW Title 81. Shuttle Express operates both door-to-door shared ride service as well as scheduled hotel service in the greater Seattle/Tacoma metropolitan areas, including most of King County and much of

Snohomish, Pierce, and Thurston Counties, as well as piers and Sea-Tac Airport, as described by and within the scope of its certificate as detailed in several sections.

4 The Applicant's requested service would largely overlap the existing authority of Shuttle Express in King, Snohomish, and Pierce Counties, requesting identical service operating in the identical area as has been granted by the certificate C-975. Shuttle Express actively provides this service and is unaware of any current or past customer complaints regarding service not being provided to the satisfaction of the Commission. Shuttle Express has an extensive fleet of vehicles of various types as well as numerous qualified and trained drivers. At this time Shuttle Express has more than enough capacity in vehicles, drivers, and dispatch to meet the current demand for door to door service in those areas it is authorized to serve in King, Snohomish, and Pierce Counties.

5 Shuttle Express actively markets and promotes its services in ways reasonably calculated to reach the traveling public and is constantly seeking to improve its services and traveler awareness of its services. Allowing Applicant to overlap any portion of Shuttle Express's authority to provide the same service as Shuttle Express would be harmful to the public interest in that it would upset the economics of door to door share ride services and drive up the average cost per passenger, leading to fare increases and reduced service quality. Since Shuttle Express already provides satisfactory service of the same type and to most of the same locations for which applicant seeks authority, there is no need for the Applicant's services.

6 At this time, Shuttle Express expects to call one or two potential witnesses to appear in support of this objection, with an estimated hearing time of one-half day, including cross examination time.

7 Due to the authority that Shuttle Express currently holds and the fact that Shuttle Express already provides service in King County to the full extent of its authority, the only restrictive amendment

that would eliminate its interest in the application would be an exclusion from all points currently certificated to Shuttle Express in three of the four counties listed in the application where Shuttle Express already provides the same service.

Respectfully submitted this 25th day of October, 2017.

LUKAS, LAFURIA, GUTIERREZ & SACHS, LLP

/s/

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WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

1300 S EVERGREEN PARK DRIVE SW, PO BOX 47250

OLYMPIA, WA 98504-7250

(360) 664-1222

This certificate authorizes the following operations under the provisions of RCW Title 81:

Shuttle Express, Inc.
d/b/a Shuttle Express,
Go Shuttle Express,
Limos by Shuttle Express,
Downtown Airporter
800 SW 16th St
Renton, WA 98057

Cert No.
C-975

Passenger service between points in King County and waterfront terminals in Seattle.

Limitations: No service may be rendered hereunder between:

1. Hotels in the cities of Sea-Tac or Tukwila and Cruise Terminals #66 and #91.
2. South Center Mall and Cruise Terminals #66 and #91.

Between: The Seattle-Tacoma International Airport, Boeing Field, Renton Airport, and Paine Field and points within the Seattle Commercial Zone in King and Snohomish Counties and excluding points in Kitsap and Pierce Counties, described as follows:

- (a) the municipality of Seattle;
- (b) All points within a line drawn fifteen miles beyond the municipal line of Seattle;
- (c) Those points in King County which are not within the area described in (b) of this subsection and which are west of a line beginning at the intersection of the line described in (b) of this subsection and Washington Highway 18, thence northerly along Washington Highway 18 to junction of Interstate Highway 90, thence westerly along Interstate Highway 90 to junction of Washington Highway 203, thence northerly along Washington Highway 203 to the King County line; and those points in Snohomish County, which are not within the area described in (b) of this subsection and which are west of Washington Highway 9.
- (d) All of any municipality any part of which is within the limits of the combined areas defined in (b) and (c) of this subsection; and
- (e) All of any municipality wholly surrounded, or so surrounded except for a water boundary, by the municipality of Seattle or by any other municipality included under the terms of (d) of this subsection.

Between: The Seattle-Tacoma International Airport, Boeing Field, Renton Airport and Paine Field and points within a 25 mile radius of these airports, excluding points in Kitsap and Pierce Counties.

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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.

RESTRICTIONS:

1) Service may not be provided to or from the Sheraton Tacoma Hotel, La Quinta Hotel, Quality Hotel, Sherwood Inn, Lakewood Motor Inn and Tacoma Inn-Best Western.

THE FOLLOWING AUTHORITY WAS OBTAINED BY TRANSFER FROM C-859 STANDING IN THE NAME OF SUBURBAN AIRPORTER, INC.

PASSENGER SERVICE BETWEEN:

Kirkland, Redmond, Bellevue, Mercer Island and Renton on the one hand and the Seattle-Tacoma International Airport on the other hand, via Interstate Highway 405 and connecting highways; subject to the following limitations: (1) The transportation service is limited to passengers, and their baggage, to or from Seattle-Tacoma International Airport. (2) No service is authorized except at points named. (3) Service at the said airport shall be conducted in accordance with authorization issued by the Port of Seattle and such authorization is a term of this certificate. In the event of failure to comply with such authorization, this certificate, after hearing, may be suspended or revoked, in whole or in part. The holder of this certificate shall file with the Commission a copy of each authorization, or cancellation thereof, issued by the Port of Seattle.

SUB. NO. 1 PASSENGER SERVICE BETWEEN:

Seattle-Tacoma International Airport, and/or Boeing Field Airport and Kirkland, Washington via county roads or city streets to Interstate 5 to Interstate 90 and/or SR 520, thence to their junction with Interstate 405, thence over Interstate 405 and County Roads to Kirkland. (a) Via Interstate 405 and County Roads to points lying between Kirkland and the Snohomish County line. (b) West of Bothell to a line drawn south from the Snohomish County line along NE 88th to NE 170th St., thence West to Lake Washington. (c) Issaquah in King County.

THE FOLLOWING AUTHORITY WAS OBTAINED BY TRANSFER FROM C-858 STANDING IN THE NAME OF COOMBS, ORVILLE J. & DIANE J.

PASSENGER SERVICE

BETWEEN:

Everett, the Everett Holiday Inn and Lynnwood and the Ramada Inn, 2140 North Northgate Way, Seattle, on the one hand and the Seattle-Tacoma International Airport on the other hand via local streets, Interstate Highway 5, State Road 518 or Interstate 405 and 99.

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BETWEEN:

Sherwood Inn located in the University District at the intersection of Interstate 5 and N.E. 45th St. and the Seattle-Tacoma International Airport via I-5 and N.E. 45th Street or alternate routes north and south.

LIMITATIONS:

1. No express service may be rendered hereunder except in the carrying of baggage of passengers.
2. No service may be rendered hereunder from, to or between intermediate points between Everett, the Everett Holiday Inn, Lynnwood and the Ramada Inn, 2140 North Northgate Way, Seattle, and the Sherwood Inn, Interstate 5 and N.E. 45th Street on the one hand and the Seattle-Tacoma International Airport on the other hand via local streets, Interstate Highway 5, State Road 518 or Interstate Highway 405 and 99 or alternate routes north and south.
3. The certificate shall remain effective only during the existence of satisfactory arrangements between the certificate holder and the Port of Seattle whereby the certificate holder shall be permitted to have access to and to afford the service under the certificate at the Seattle-Tacoma Airport.
4. The certificate holder must promptly furnish this Commission with a copy of any subsequent arrangements with the Port of Seattle which will change, modify, or expand any prior arrangements filed with the commission.

THE FOLLOWING AUTHORITY WAS OBTAINED BY TRANSFER FROM C-819 STANDING IN THE NAME OF EVERGREEN TRAILS, INC.

BETWEEN: Seattle and Seattle-Tacoma Airport.

LIMITATIONS:

1. Service hereunder is expressly limited to the transportation of airline passengers and flight crews between Seattle-Tacoma Airport on the one hand, and hotels, air and ground transportation office and facilities in Seattle on the other hand, at rates substantially higher than the fares of regular common carriers.
2. No express service may be rendered hereunder except in the carrying of baggage and excess baggage of passengers and flight crews.
3. No service may be rendered hereunder from, to or between intermediate points.

TC-120546

04-25-12

**WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**



By _____

