

1 Paul Kajanoff
2 Shuttle Express, Inc.
3 800 SW 16th St.
4 Renton, WA 98057

5 WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

6 Sani Mahama Maurou) Case No.: TC-140399
7)
8 d/b/a Seatac Airport 24,) Objection to PERMANENT Auto
9 Applicant) Transportation Authority Application
10)

11 I, Paul Kajanoff, submit the following on behalf of Shuttle Express,
12 Inc. located at 800 SW 16th Street, Renton, Washington, 98057.

13 Shuttle Express respectfully objects to the application for PERMANENT
14 Auto Transportation Authority in docket TC-140399, filed 03/12/14 by Sani
15 Mahama Maurou, d/b/a Seatac Airport 24, 165 17th Ave. #102, Seattle, WA 98122.

16 Shuttle Express is the named holder under Certificate of Public
17 Convenience and Necessity number C-975 as provided under the provisions of
18 RCW Title 81. Shuttle Express operates both door-to-door shared ride service
19 as well as scheduled hotel service in the greater Seattle/Tacoma metropolitan
20 areas, including all areas allowed as provided by its certificate. Listed
21 below are the specific objections to each of the applicant's requested
22 services:

23 (1) Requested Service: Tulalip Casino Resort in Marysville and Seattle
24 Tacoma International Airport.

25 Per last paragraph of page one of Certificate Number C-975; "Between:
26 The Seattle-Tacoma International Airport, Boeing Field, Renton Airport and
27 Paine Field and points within a 25 mile radius of these airports...".

1 The requested service is within a 25 mile radius of Paine Field and
2 therefore within the existing service area as provided by C-975. Shuttle
3 Express actively provides this service and is unaware of any current or past
4 customer complaints related to this service.

5 (2) Requested Service: The Westin Hotel in downtown Seattle and Seattle
6 Tacoma International Airport.

7 Per last paragraph of page three of Certificate Number C-975; "THE
8 FOLLOWING AUTHORITY WAS OBTAINED BY TRANSFER FROM C-819 STANDING IN THE NAME
9 OF EVERGREEN TRAILS, INC. Between: Seattle and Seattle-Tacoma Airport.1.
10 Service hereunder is expressly limited to the transportation of airline
11 passengers and flight crews between Seattle-Tacoma on the one hand, and
12 hotels, air and ground transportation office and facilities in Seattle.."

13 The requested service is between The Westin Hotel in downtown Seattle
14 and Seattle-Tacoma Airport and therefore within the existing service area as
15 provided by C-975. Shuttle Express actively provides this service and is
16 unaware of any current or past customer complaints related to this service.
17 In addition, Shuttle Express currently works with the Westin to market and
18 promote ridership.

19 (3) Requested Service: Snoqualmie Casino and Seattle Tacoma
20 International Airport.

21 Per last paragraph of page one of Certificate Number C-975; "Between:
22 The Seattle-Tacoma International Airport, Boeing Field, Renton Airport and
23 Paine Field and points within a 25 mile radius of these airports...".

24 The requested service is within a 25 mile radius of Seattle Tacoma
25 International Airport and therefore within the existing service area as
26 provided by C-975. Shuttle Express actively provides this service and is
27 unaware of any current or past customer complaints related to this service.

1 (4) Requested Service: Best Western Sky Valley Inn in Monroe and
2 Seattle Tacoma International Airport.

3 Per last paragraph of page one of Certificate Number C-975; "Between:
4 The Seattle-Tacoma International Airport, Boeing Field, Renton Airport and
5 Paine Field and points within a 25 mile radius of these airports...".

6 The requested service is within a 25 mile radius of Paine Field and
7 therefore within the existing service area as provided by C-975. Shuttle
8 Express actively provides this service and is unaware of any current or past
9 customer complaints related to this service.

10
11 In addition to the specific objections listed above, Shuttle Express
12 has a general objection related to our interest that all licensed share ride
13 and scheduled service operators embrace the rules and regulations of our
14 industry to ensure a true commitment to serving the public. Our general
15 objection includes the following:

16 (1) Shuttle Express has contacted Seatac Airport 24 (also called
17 "Express Ones", "Express One", "ShuttleExpress24.com", and "Sani & Partners")
18 for violations of its registered trademark and Seatac Airport 24 continues to
19 use our registered trademark without permission.

20 (2) Seatac Airport 24 has not been awarded a certificate by the UTC to
21 provide share ride services, however SeatacAirport24.com offers share ride
22 services to numerous locations on its website.

23 (3) The applicant indicated that two vehicles were owned and operated
24 by the applicant for the purposes of the application. On the replacement
25 pages, the applicant indicates that there are three routes running
26 concurrently, including six time periods that both directions would run
27 concurrently, and requiring a minimum of six vehicles to properly operate the
28 proposed routes. Shuttle Express has the equipment required to operate

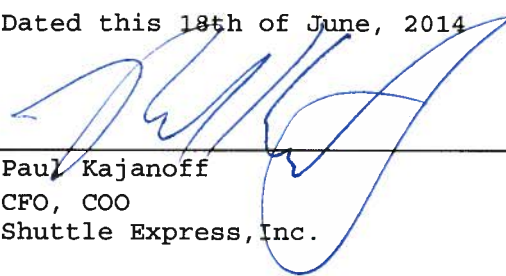
1 effectively in these areas concurrently and the wherewithal to acquire
2 additional equipment when demand increases.

3
4 (4) The applicant indicated on the initial application that no other
5 companies currently provide service between any of the points or along any
6 portion of the route they proposed to serve. Shuttle Express' certificate
7 allows us to serve these routes and we are actively providing service.

8
9 Shuttle Express requests four potential witnesses to appear in this
10 objection, with an estimated hearing time of thirty minutes for presentation.
11 Shuttle Express has also included a copy of the most recently issued
12 certificate C-975 with highlighted portions we believe are pertinent to the
13 request for new authority by the applicant.

14 Due to the authority that Shuttle Express currently maintains and
15 exercises, we do not feel that there is any restrictive amendment that would
16 eliminate our interest in the application.

17 Dated this 18th of June, 2014

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20 _____
21 Paul Kajanoff
22 CFO, COO
23 Shuttle Express, Inc.
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