



WASHINGTON REFUSE & RECYCLING ASSOCIATION

June 9, 2008

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

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Dear Ms. Washburn:

Please consider the following as initial comments from Washington Refuse and Recycling Association on the rulemaking listed in **Docket No. TG-080591**.

First, we obviously cannot comment on any specific proposals until we know what they are. However, there are areas in which WRRA has serious interest and we trust will be addressed in this proceeding.

Specifically, we understand there will be a thorough review of the definitional section of WAC 480-70. WRRA agrees this is timely and necessary. Of particular importance would be an effort to see that the Commission's definitional rules do not conflict with those of other agencies, statutes or case law.

Secondly, clarification, by definition, of the difference between common carriage (RCW 81.80) and solid waste collection (RCW 81.77) is not only desirable but absolutely necessary. The appropriate use of rules, particularly definitional rules, can be of significant assistance in the battle against "sham recyclers" and "poaching."

Finally, we think this docket can be a basis for enhanced enforcement of the Commission's enabling statute and rules. We see this as perhaps the most important aspect of this proceeding.

WRRA looks forward to working with its members and Commission Staff on this most important project. We will attend Stakeholder Workshops and comment in detail on actual proposed rule changes when they are available.

Sincerely,

BRAD LOVAAS
Executive Director