

Washington Utilities and Transportation Commission
1300 S Evergreen Park DR SW
PO Box 47259
Olympia, WA 98504-7250

December 23, 2014

Seatac Shuttle, LLC C-1077
PO Box 2895
Oak Harbor, WA 98277

In RE: Application of Northwest Smoking and Curing, Inc.
For Expansion of authority TC-143864

Comments of Seatac Shuttle, LLC:

Upon review of the initial application submitted by NW Smoking & Curing, Inc. it appears that on the *pro forma* submitted they suggest earnings that place their rate structure outside the bounds of any margin ever contemplated by the Commission or the other certificate holders. It is our observation that if approved this will then set a precedent for all other operators to secure higher rates than those currently allowed for in WAC 480-30. Without adjusting the proposed rates downward to be compliant, Seatac Shuttle strongly urges the Commission to deny the application.

Further, we agree with the objection of Whatcom Transportation Authority and its proposed additional language to the authority sought in that if the UTC is to have jurisdiction in this matter the service proposed must be a through service to Seatac International Airport. Without such restriction on the proposed authority the service becomes, as pointed out by Bremerton-Kitsap Airporter, Inc. in its objection, a taxi service requiring a Washington State Department of Licensing "For Hire" permit as well as the permission of the City of Bellingham.

Respectfully submitted,

Michael Lauver
Seatac Shuttle, LLC