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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of:

WASTE MANAGEMENT OF WASHINGTON,
INC. D/B/A WM HEALTHCARE SOLUTIONS
OF WASHINGTON

For an Extension of Certificate G-237 for a
Certificate of Public Convenience and Necessity
to Operate Motor Vehicles in Furnishing Solid
Waste Collection Service

Docket No. TG-120033

**DECLARATION OF JEFF NORTON
IN SUPPORT OF WASTE
MANAGEMENT'S OPENING BRIEF
ON PRELIMINARY LEGAL ISSUE**

I, Jeff Norton, declare as follows:

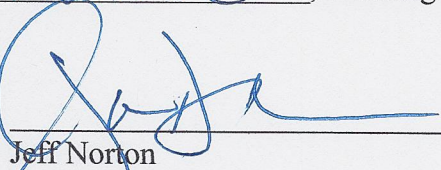
1. I am the Account Development Manager for the Pacific Northwest region for Waste Management Healthcare Solutions. I am responsible for managing all medium- and large-quantity healthcare accounts and generating new accounts throughout Washington State. I make this declaration based on personal knowledge.
2. In all of Waste Management's Certificate No. G-237 territory, Waste Management is presently in competition with Stericycle and, additionally, it competes with Protestant Murrey's Disposal in a small portion of Murrey's Pierce County territory and with Protestant Rubatino Refuse Removal in annexation territories around Everett.
3. At least 52 Washington hospitals, large and small, have no choice of service provider other than Stericycle. These hospitals include Lourdes Medical Center in Pasco, Madigan Army Medical Center in Fort Lewis, Grays Harbor Community Hospital in Aberdeen, Island Hospital in Anacortes, Okanogan Douglas District Hospital in Brewster, Forks Community Hospital, Mark Reed

1 Hospital in McCleary, Morton General Hospital in Cowlitz, Garfield District Hospital in Pomeroy,
2 Jefferson General Hospital in Port Townsend, United General Hospital in Sedro Woolley, Snoqualmie
3 Valley Hospital, Willapa Harbor Hospital in South Bend, Sunnyside Community Hospital, Yakima
4 Valley Memorial Hospital, Mid Valley Hospital in Omak, Allenmore Hospital in Tacoma, Mary Bridge
5 Children's Hospital and Health Center in Tacoma, Tacoma General Hospital, US Navy Hospital in Oak
6 Harbor, Overlake Hospital Medical Center in Bellevue, Saint Joseph Hospital in Bellingham, Lake
7 Chelan Community Hospital, Whidbey General Hospital in Coupeville, Lincoln Hospital in Davenport,
8 Coulee Community Hospital, Saint Joseph Medical Center in Longview, Samaritan Hospital in Moses
9 Lake, Newport Community Hospital, Odessa Memorial Hospital, Quincy Valley Medical Center, Ferry
10 County Memorial Hospital in Republic, East Adams Rural Hospital in Ritzville, Mason General
11 Hospital in Shelton, North Valley Hospital in Tonasket, Centralia Hospital, Saint Joseph's Hospital in
12 Chewelah, Whitman Hospital in Colfax, Mount Carmel Hospital in Colville, Saint Peter Hospital in
13 Olympia, Swedish Hospital-Edmonds, Olympic Memorial Hospital in Port Angeles, Fairfax Hospital in
14 Kirkland, VA Puget Sound-American Lake in Lakewood, VA Southwest Washington in Vancouver,
15 Saint Elizabeths Hospital-Enumclaw, Saint Anthony Hospital in Gig Harbor, Saint Clare Hospital in
16 Lakewood, Saint Joseph Medical Center in Tacoma, Capital Medical Center in Olympia, Toppenish
17 Community Hospital, and Yakima Regional Medical Center.

18 4. There are at least eight hospital groups with hospitals both inside the Certificate No. G-
19 237 territory – where there presently is competition between Waste Management and Stericycle – and
20 in the remaining territory – where only Stericycle may collect biomedical waste. These hospital groups
21 include the US Navy, Peace Health, Providence, Swedish, Universal Health Services, Veterans
22 Administration, Catholic Healthcare Initiatives, and Capella Health.

23 I declare under penalty of perjury under the laws of the State of Washington and the United
24 States that the foregoing is true and correct.

25 EXECUTED this 14th day of June, 2012 at Monroe, Washington

26
27 
28 Jeff Norton

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all parties of record in this proceeding, by the method indicated below, pursuant to WAC 480-07-150.

Table with 2 columns: Recipient Information and Service Method. Rows include Washington Utilities and Transportation Commission, Gregory J. Kopta, Fronda Woods, Stephen B. Johnson, Jared Van Kirk, Garvey Schubert Barer, James K. Sells, and Cheryl Murrey.

DATED at Seattle, Washington, this 14th day of June, 2012.

Signature of Deanna L. Schow and printed name Deanna L. Schow