



# Investigation Report

Waste Management of Washington, Inc.

TG-121265

Rayne Pearson  
Compliance Investigations

## **PURPOSE, SCOPE AND AUTHORITY**

### **Purpose**

The purpose of this investigation is to determine if Waste Management of Washington, Inc. (Waste Management) violated commission laws and rules when it failed to provide scheduled service to more than 135,000 customers during a labor strike that occurred between July 25 and Aug. 2, 2012. Revised Code of Washington (RCW) 81.28.080 requires solid waste collection companies to follow the rules in their tariff; Waste Management's tariff does not allow service disruptions due to labor strikes.

### **Scope**

The scope of this investigation is limited to the labor strike that occurred between July 25 and Aug. 2, 2012.

### **Authority**

Staff undertakes this investigation pursuant to RCW 81.04.070. WAC 480-70-216 authorizes the commission to administer and enforce laws and rules relating to solid waste collection companies.

### **Staff**

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<sup>1</sup> Betty Young prepared the safety investigation portion of this report, which appears on pages 12-13.

## EXECUTIVE SUMMARY

Staff conducted this investigation to evaluate the impact of Waste Management's missed solid waste collection services during the labor strike that occurred between July 25 and Aug. 2, 2012.

Beginning the first day of the strike, commission staff communicated daily with the company regarding the status of negotiations and service restoration. On July 31, 2012, commission staff notified the company that it would be required to provide day-by-day customer service data once the strike ended. Waste Management did not provide staff with information specific to commission-regulated service until Aug. 2.

On Aug. 24, the commission issued a data request requiring the company to produce detailed documentation related to missed pickups during the strike. On Oct. 1, the company provided an incomplete response. In its response, the company claimed that "WMW does not track which specific customers have been serviced ... This information is not reasonably available to WMW." The company's refusal to provide customer-specific missed pickup data obstructed staff's ability to calculate an accurate number of violations, which resulted in staff finding fewer violations than it would have had all of the required information been provided.

Staff found the company's response insufficient, and therefore in violation of RCW 81.04.380, which requires regulated companies to comply with commission directives. Based on the limited data provided, staff estimated that Waste Management missed at least 278,222 pickups between July 25 and Aug. 2, 2012, resulting in at least 278,222 violations of RCW 81.28.080. Due to the inadequate data, only 208,567 of the violations could be substantiated.

The company's response also included a "Labor Disruption Contingency Plan," detailing the company's commitment to using replacement drivers during labor disputes to ensure an adequate level of service. Other data provided by the company demonstrated, however, that the company's actual performance during the strike failed to match the description outlined in its plan. Accordingly, staff found that Waste Management violated RCW 81.28.010 and .020 on each day of the strike. Staff also found that Waste Management disproportionately allocated its replacement workforce to contract-city service areas to the detriment of its customers in commission-regulated areas, which violates RCW 81.28.190.

Between Aug. 3 and Oct. 17, 2012, consumer protection complaint staff received 136 complaints from Waste Management customers who did not receive service during the strike. Staff recorded 323 violations of WAC 480-70-236 for 323 missed pickups. Additionally, staff recorded seven violations of WAC 480-70-386(b)(i) for a late response to a consumer complaint.

Staff conducted an investigation related to the replacement drivers used during the strike, and found the following violations of Title 18 CFR:

- For one driver, Waste Management failed to prepare a driver vehicle inspection report, which violated CFR Part 396.11.
- For one driver, Waste Management failed to ensure that the online employment application completed by the employee met federal requirements, which violated CFR Part 391.21.
- For eight drivers, Waste Management failed to obtain copies of driving records within 30 days of hire, which violated CFR Part 391.23(b).
- For two drivers, Waste Management failed to maintain copies of motor vehicle records for the preceding 12 months, which violated CFR Part 391.25(c)(1).
- For three drivers, Waste Management failed to maintain annual driving record reviews, which violated CFR Part 391.25(c)(2).
- For three drivers, Waste Management failed to maintain annual certifications of violations of motor vehicle traffic laws and ordinances, which violated CFR Part 391.27.

### **Recommendation**

Staff recommends the commission issue a formal complaint and assess a total penalty of up to \$2,146,600, for the following violations:

- Up to \$1,000 for each of the 30 violations of RCW 81.04.380, related to the company's incomplete response to the commission's data request, for a total potential penalty of \$30,000.
- Up to \$1,000 for each of the nine violations of RCW 81.28.010, related to the company's failure to maintain facilities and equipment during the strike sufficient to provide service as required, for a total potential penalty of \$9,000.
- Up to \$1,000 for each of the nine violations of RCW 81.28.020, related to the company's failure to provide sufficient service during the strike, for a total potential penalty of \$9,000.
- Up to \$1,000 for each of the nine violations of RCW 81.28.190, related to the unreasonable preference given to city-contract service areas during the strike, for a total potential penalty of \$9,000.
- \$10 for each of the 208,567 violations of RCW 81.28.080, related to missed pickups found in connection with staff's data request, for a total penalty of \$2,085,670.
- \$10 for each of the 323 violations of RCW 81.28.080, related to missed pickups found in connection with consumer complaints, for a total penalty of \$3,230.
- \$100 for each of the seven violations of WAC 480-70-386(b)(i), related to the company's late response to consumer complaint 115667, for a total penalty of \$700.

Staff also recommends that Waste Management closely review the safety violations cited in this report, which constitute technical assistance. Future violations will result in additional enforcement action, including penalties.

## **BACKGROUND**

### **Company Information**

Waste Management of Washington, Inc. is a for-profit corporation. Duane Woods is president, and Don Carpenter, Cherie Rice, Linda Smith, and Greg Robertson each hold the title of Vice President.

Waste Management provides solid waste collection services in King and Snohomish counties under a certificate of public convenience and necessity granted by the commission, G-237, as follows:

- d/b/a Waste Management South Sound (King County) under Tariff No. 22
- d/b/a Waste Management Seattle (King County) under Tariff No. 22
- d/b/a Waste Management Sno-King (King County) under Tariff No. 15
- d/b/a Waste Management Northwest (Snohomish County) under Tariff No. 17

Waste Management collected \$122,272,706 in regulated revenue statewide in 2011, and serves approximately 135,000 residential and commercial solid waste collection customers in King and Snohomish counties.

### **Investigation**

This investigation was prompted by a labor strike that occurred between July 25 and Aug. 2, 2012.

## INVESTIGATION

Waste Management serves approximately 130,000 residential customers and 5,000 commercial customers in commission-regulated areas of King and Snohomish counties.

On July 25, 2012, at 2:30 p.m., Waste Management notified commission staff that drivers represented by Teamsters Local 117 had called a strike that morning, and drivers represented by Teamsters Local 174 were honoring the picket lines.<sup>2</sup> Although staff repeatedly asked the company for information regarding replacement drivers, missed service, and service restoration, email status updates provided by the company on July 27, 29, and 30 failed to provide any details related to service interruptions in commission-regulated areas.<sup>3</sup>

On July 31, 2012, commission staff notified Waste Management that it would be required to provide day-by-day customer service data once the strike was over. On Aug. 2, staff received the first communication from the company regarding commission-regulated service. That same day, the commission sent a letter informing the company that a formal investigation had been opened, and requiring the company to attend the commission's public meeting on Aug. 9 in Woodinville to discuss its strike response strategy and data related to missed service.<sup>4</sup> The company failed to provide any of the requested documentation at the public meeting.

### **Data Request**

On Aug. 24, 2012, staff issued a comprehensive data request to Waste Management requiring missed pickup information for each customer, each day, from the day the strike began until all services missed during and subsequent to the strike were collected. Staff also requested detailed information regarding the company's use of replacement drivers and its implementation of its labor dispute contingency plan during the strike.<sup>5</sup> Staff requested a response by Sept. 24, 2012.

Staff met with the company on Sept. 7 to discuss the company's response to the data request. During that meeting, the company represented that it may not be able to provide the requested data because the company had no record of which customers missed scheduled pickups during the strike. The company subsequently requested an extension for responding to the data request until Oct. 1, 2012. On Oct. 1, the company provided an incomplete response.<sup>6</sup> In its response, the company claimed that "WMW does not track which specific customers have been serviced. As a result, WMW respectfully objects to the data requests seeking missed collection information on a customer-specific basis. This information is not reasonably available to WMW."

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<sup>2</sup> Drivers represented by Teamsters Local 117 collect recyclables and food and yard waste; drivers represented by Teamsters Local 174 collect garbage.

<sup>3</sup> A copy of a commission staff document entitled "Waste Management Strike Timeline," which details communications between staff and the company, is attached as Appendix A.

<sup>4</sup> A copy of the Aug. 9, 2012, letter to Waste Management is attached as Appendix B.

<sup>5</sup> A copy of the Aug. 24, 2012, data request is attached as Appendix C.

<sup>6</sup> A copy of the Oct. 1, 2012, response to staff's data request is attached as Appendix D.

The company's response, however, also included a document entitled "Waste Management's 2012 Puget Sound Labor Disruption Contingency Plan" addressing the use of pre-programmed GPS units with "customer, transfer station, and recycling facility locations for each route." The information contained in the contingency plan directly contradicts the company's claim that customer-specific data was not available.

The company's refusal to provide customer-specific data regarding missed pickups during the strike obstructed staff's ability to calculate an accurate number of violations, which resulted in staff finding substantially fewer violations than it would have had all of the requested information been provided. The methodology staff used to calculate missed pickups relied on actual versus average tonnage collected, which was inevitably skewed by those customers who set out additional waste once normal service resumed. For example, if a route was collected after one missed pickup, the amount of waste set out was likely twice the normal amount, which would artificially inflate the amount of tonnage collected in relation to average tonnage for that route. Staff chose the most conservative approach to calculate violations for days where missed pickups were estimated rather than speculating about how many customers set out additional waste versus how many customers chose to dispose of uncollected waste in other ways.

In addition, the company's formal response to the commission's questions regarding its use of replacement drivers differed substantially from the statements made by its representative at the commission's open meeting on October 25, 2012, discussed in detail below.

### **Findings**

Staff finds the company's response was both insufficient and inaccurate, and therefore in violation of RCW 81.04.380. Staff finds that the company violated RCW 81.04.380 for 30 days, between October 1 and October 31, 2012, by failing to provide the information staff required the company to produce. Although the day count for violations could be considerably longer (and, by law, could continue until the company provides the required information), staff believes that 30 days is reasonably proportionate given the ramifications of the violations. It is sufficiently punitive, but not unduly harsh.

### **Strike Management**

#### **2012 Strike Background**

During the company's 2010 strike, Waste Management relied on the inclement weather provision of its tariff to address missed pickups, allowing customers to leave out waste that accumulated during the strike at no additional cost. Staff did not assess penalties, but cautioned the company that it would not support the company's reliance on its inclement weather provision going forward.

On May 18, 2012, the commission sent a technical assistance letter to all solid waste companies instructing them to revise their tariffs to address strike-related service disruptions, and notifying

them that they may no longer rely on inclement weather tariff provisions during such disruptions.<sup>7</sup> Waste Management did not file a tariff revision to address strike-related service disruptions until June 6, 2012, requesting an Aug. 1 effective date. The strike commenced before the commission could act on the company's request.

The commission provided ample notice and opportunity for Waste Management to revise its tariff to address labor-related service disruptions. The company ignored this guidance until the most recent strike was imminent.

### **Contingency Plan**

In response to staff's data request regarding the company's strike contingency plan, Waste Management produced a document entitled "Waste Management's 2012 Puget Sound Labor Disruption Contingency Plan" addressing the use of a replacement labor force (known as the "Green Team"), the use of pre-programmed GPS units with "customer, transfer station, and recycling facility locations for each route," a temporary collection schedule, and a public education component. The company shared its plan with staff prior to the strike as a demonstration of the company's commitment to managing the strike and mitigating customer impact. On July 26, 2012, Waste Management informed commission staff that the company was following its contingency plan, and that it expected its Green Team of replacement drivers to be on the job by July 29.

### **Replacement Drivers**

On page five of its response to the commission's data request, Waste Management provided the following explanation for the company's delay in deploying replacement drivers:

*The entire Green Team was activated once the strike officially began on Wednesday, July 25<sup>th</sup>. Due to obvious logistical issues, Green Team members arrived in waves over the course of the strike ... While Green Team members began arriving on Thursday, there are several reasons for the gap between the arrival day and the actual deployment day. First, for safety concerns, WMW does not operate in a strike situation until full security measures are in place. Here, security was not in place until Friday, July 27<sup>th</sup>. Second, replacement drivers must be fully processed to ensure compliance with federal, state, and local laws and regulations before dispatched to work, whether they be Green Team members or local resources.*

During the workshop held at the commission's open meeting on Oct. 25, 2012, however, Tim Crosby, Waste Management's Labor Relations Manager, stated on the record that "we did not pull the trigger on our replacement drivers soon enough. We should have done it earlier, but we thought with only a couple of days we'd try and save those costs."<sup>8</sup> Mr. Crosby's statement directly contradicts the reasons for the delay that the company set forth in its formal response to the commission.

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<sup>7</sup> A copy of the May 18, 2012, letter to regulated solid waste carriers is attached as Appendix E.

<sup>8</sup> October 25, 2012, open meeting digital recording at 50:18.



Between July 16 and 20 and prior to the strike, the company deployed an average of 358 drivers each day to collect recyclables and solid waste. The table below, which is based on the company’s response to staff’s data request, demonstrates that, during the strike, the company did not deploy more than 84 drivers (23 percent of its typical workforce) until the last day of the strike.

***Deployment of Replacement Drivers by Day***

<b>Date</b>	<b>Day</b>	<b>Number of Drivers Deployed</b>
July 26	Thursday	0
July 27	Friday	9
July 28	Saturday	24
July 29	Sunday	0
July 30	Monday	79
July 31	Tuesday	84
Aug. 1	Wednesday	166
Aug. 2	Thursday	Regular drivers return

The company reported in its response that, for strike planning purposes, the company typically anticipates activating over 400 Green Team members; yet seven days elapsed before it was able to deploy 166 drivers, less than half that number. The company’s performance does not match its contingency plan, nor the assurances provided to staff when the strike began.

RCW 81.28.010 requires carriers to provide and maintain equipment and facilities sufficient to “enable it to promptly, expeditiously, safely, and properly receive, transport, and deliver all persons or property offered to or received by it for transportation.” In addition to providing and maintaining equipment and facilities, carriers are required by RCW 81.28.020 to provide service in the manner prescribed by .010 “under reasonable rules and regulations.” Waste Management’s substandard performance during the strike—absent a tariff provision temporarily relieving it of its statutory duties—violated both provisions.

**Allocation of Drivers between City-Contract and Commission Customers**

Waste Management serves approximately 130,000 residential customers and 5,000 commercial customers in commission-regulated areas of King and Snohomish counties. The company serves approximately the same number of residential customers, and 14,000 commercial customers, in city-contract areas of King and Snohomish counties. The company’s service total for

commission-regulated areas of King and Snohomish counties is 333,793; for city-contract areas, it is 405,604.<sup>9</sup>

The commission regulates 45 percent of the total 739,397 services provided in King and Snohomish counties. A review of driver records during the commission’s safety inspection revealed that of the 228 total Green Team drivers deployed during the strike, only 21— or 9 percent— were deployed to commission-regulated areas. The statistics demonstrate that the majority of missed pickups during the strike occurred in commission-regulated areas of King and Snohomish Counties.

Waste Management’s strike contingency plan did not address the company’s intent to focus its service restoration efforts on contract-city service areas to the detriment of its customers in commission-regulated areas; yet, that is what the company did.

RCW 81.28.190 provides that carriers “shall not make or give any undue or unreasonable preference or advantage to any person, corporation, locality, or particular description of traffic in any respect whatsoever, or subject any particular person, corporation, locality, or particular description of traffic, to any undue or unreasonable prejudice or disadvantage in any respect whatsoever.” Staff believes that Waste Management violated RCW 81.28.190 each day of the strike—a total of nine times—by disproportionately allocating its replacement drivers to city-contract areas to the detriment of its customers residing in commission-regulated service areas.

### **Findings**

Staff finds the data provided demonstrates that, despite assurances to the contrary, Waste Management failed to adequately prepare for, or manage, the strike. Although the commission may not hold the company accountable for the strike itself, it can—and must— hold the company accountable for its unreasonable management of it. Accordingly, staff finds nine violations each of RCW 8.28.010, .020, and .190, one for each day of the strike, for a total of 27 violations.

### **Missed Pickups—Data Request**

As discussed above, Waste Management failed, and later refused, to provide customer-specific data regarding missed pickups during and following the strike. Instead, the company provided charts reflecting the number of scheduled and actual routes, the number of accounts per route, the average tonnage for each route, and the actual tonnage collected for each day from the day the strike began until normal service resumed.

For days when no collection occurred, determining the number of violations was straightforward.

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<sup>9</sup> The service total represents the number of customers multiplied by the number of services each of those customers receives.

The table below displays missed pickups by day where exact numbers were available because no scheduled pickups occurred:

***Missed Service Pickups by Date***

<b>Date</b>	<b>Missed Pickups</b>
<b>July 26</b>	45,689
<b>July 27</b>	43,242
<b>July 28</b>	15
<b>July 30</b>	44,515
<b>July 31</b>	50,001
<b>Aug. 1</b>	25,105
<b>TOTAL</b>	208,567

In the absence of adequate information, staff was required to develop an alternate method for calculating violations on days when partial collections occurred. For calculating missed pickups on partial collection days, staff used the following algorithm:

- Actual tonnage was calculated as a percentage of average tonnage for each route. If actual tonnage equaled 20 percent of the average tonnage on a given route, staff assumed only 20 percent of customers on that route were served, and 80 percent were not.
- The number of scheduled accounts was then multiplied by the percentage difference between the average and actual tonnage (in the above example, 80 percent). For a route with 20,000 accounts, for example, 15,000 violations (representing 80 percent of the scheduled accounts) were cited.

The table below displays estimated missed pickups by day where exact numbers were not available:

***Estimated Missed Service Pickups by Date***

<b>Date</b>	<b>Estimated Missed Pickups</b>
<b>July 25</b>	25,435
<b>July 27</b>	627
<b>July 30</b>	273
<b>July 31</b>	86
<b>Aug. 1</b>	24,607
<b>Aug. 2</b>	18,627
<b>TOTAL</b>	69,655

**Findings**

Based on the limited information provided, staff finds that Waste Management violated RCW

81.28.080 and its own tariff 208,567 times between July 25 and Aug. 2, 2012, and estimates that at least 69,655 additional violations occurred.

### **Missed Pickups- Consumer Complaints**

Between Aug. 3 and Oct. 17, 2012, staff received 136 complaints from Waste Management customers who missed service due to the strike. Staff recorded 323 violations of WAC 480-70-236 for 323 missed pickups.<sup>10</sup> Additionally, staff recorded seven violations of WAC 480-70-386(b)(i) for a late response to consumer complaint 115667.<sup>11</sup>

### **Findings**

Staff finds that Waste Management violated RCW 81.28.080 and WAC 480-70-236 a total of 323 times in the 136 consumer complaints filed with the commission. Additionally, staff finds that Waste Management violated WAC 480-70-386(b)(i) seven times.

### **Safety Investigation**

WAC 480-70-201 requires solid waste collection companies to comply with both state and local laws related to vehicle and driver safety and Title 49, Code of Federal Regulations (CFR). WAC 480-70-999 adopts by reference certain provisions of the CFR, including Part 391 – Qualification of Drivers, and Part 396 – Inspection, Repair and Maintenance.

On Sept. 6, 2012, commission Motor Carrier Safety Inspector John Foster met with Alan York, Area Safety Manager, at Waste Management’s corporate office in Kirkland. Additional Waste Management staff were present, including Tom Cieloha (Safety Trainer), Scott Sadler (Vancouver B.C. Safety Manager), Rebecca Zorich (Operations Specialist), Sherry Andrews (Dispatch Supervisor), and Faustina Washburn (Fleet Compliance Manager).

Staff reviewed the driver qualification files, hours of service records, and Department of Transportation drug and alcohol testing records for the 228 Green Team drivers used during the strike, all of whom were Waste Management employees from Arizona, California, Colorado, Indiana, Kansas, New Mexico, Oregon, Virginia, Washington, and West Virginia.

Staff found that each of the 21 drivers deployed to commission-regulated areas complied with commercial driver’s license requirements. Staff found no violations related to daily driver hours of service records.

Staff found the following violations of 18 CFR:

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<sup>10</sup> A spreadsheet detailing the missed pickups and violation count for each consumer complaints is attached as Appendix F.

<sup>11</sup> A copy of master complaint 114699 is attached as Appendix G.

- For one driver, Waste Management failed to prepare a driver vehicle inspection report, which violated CFR Part 396.11.
- For one driver, Waste Management failed to ensure that the online employment application completed by the employee met federal requirements, which violated CFR Part 391.21.
- For eight drivers, Waste Management failed to obtain copies of driving records within 30 days of hire, which violated CFR Part 391.23(b).
- For two drivers, Waste Management failed to maintain copies of motor vehicle records for the preceding 12 months, which violated CFR Part 391.25(c)(1).
- For three drivers, Waste Management failed to maintain annual driving record reviews, which violated CFR Part 391.25(c)(2).
- For three drivers, Waste Management failed to maintain annual certifications of violations of motor vehicle traffic laws and ordinances, which violated CFR Part 391.27.

### **Findings**

Staff found 18 violations during the safety review, none of which were categorized as “critical” or “acute.” None of the 17 paperwork violations found were repeat violations; the commission generally does not assess penalties for first time paperwork violations.

Of the 126 files reviewed, staff found only one safety-related violation of CFR Part 396.11 where one driver failed to prepare a daily vehicle inspection report for one day. According to federal criteria, penalties for this violation would only be appropriate if more than one violation was found, and more than ten percent of the records reviewed contained violations. None of the violations affect the company’s safety rating.

For these reasons, staff recommends that Waste Management carefully review the violations cited above, which constitute technical assistance. Future violations will result in additional enforcement action, including penalties.

## SANCTIONS AND RECOMMENDATIONS

### Penalty for Missed Pickups

In its investigation, staff documented 208,567 violations of RCW 81.28.080 and the company's own tariff resulting from missed pickups during the strike that occurred between July 25 and Aug. 2, 2012. In addition, staff estimates that the company committed at least 69,566 additional violations that remain unsubstantiated because the company claims it does not track whether individual customers receive service.

Staff typically recommends a “per violation” penalty against a regulated company where the violations result in serious customer harm; for repeat violations of a rule after a company receives technical assistance from staff; or for intentional violations of commission laws or rules. The commission has the authority to assess penalties of \$100 per violation, per day against a regulated company without providing the opportunity for a hearing.<sup>12</sup> The commission also has the authority to assess penalties of up to \$1,000 per violation, per day following a formal complaint and hearing.<sup>13</sup>

Here, staff believes a “per violation” penalty is warranted for each of the 208,567 missed pickups confirmed by the data Waste Management provided. Given the large number of violations, however, staff believes that a penalty of \$10 per violation is appropriate.

Staff also believes that Waste Management's actions— and inactions— increased the impact of the strike on its customers. Accordingly, staff believes the following factors weigh against mitigation of the recommended penalties:

1. Waste Management mismanaged its response to the strike, and failed to carry out the most minimal actions identified in its labor dispute contingency plan. For example, the company did not deploy even 25 percent of its regular driver workforce until Aug. 1, the sixth day of the strike.
2. The company allocated a disproportionate share of its replacement drivers to restore service in contract cities to the detriment of its customers in commission-regulated areas.
3. The commission notified the company following its 2010 strike that it could no longer rely on the inclement weather provision of its tariff during labor disputes, but Waste Management took no action to address this issue until June 2012.
4. The company refused to provide customer specific data to demonstrate which customers received service during the strike, even though staff reasonably believes it has access to such data.

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<sup>12</sup> RCW 81.04.405 allows the commission to assess an administrative penalty for any violation by a regulated company of a statute, rule, the company's own tariff or an order of the commission.

<sup>13</sup> RCW 81.04.380 allows the commission to assess a penalty of up to \$1,000 for each violation after hearing.

## **Recommendation**

Staff recommends the commission issue a formal complaint and assess a total penalty of up to \$2,146,600, for the following violations:

- Up to \$1,000 for each of the 30 violations of RCW 81.04.380, related to the company's incomplete response to the commission's data request, for a total potential penalty of \$30,000.
- Up to \$1,000 for each of the nine violations of RCW 81.28.010, related to the company's failure to maintain facilities and equipment during the strike sufficient to provide service as required, for a total potential penalty of \$9,000.
- Up to \$1,000 for each of the nine violations of RCW 81.28.020, related to the company's failure to provide sufficient service during the strike, for a total potential penalty of \$9,000.
- Up to \$1,000 for each of the nine violations of RCW 81.28.190, related to the unreasonable preference given to city-contract service areas during the strike, for a total potential penalty of \$9,000.
- \$10 for each of the 208,567 violations of RCW 81.28.080, related to missed pickups found in connection with staff's data request, for a total penalty of \$2,085,670.
- \$10 for each of the 323 violations of RCW 81.28.080, related to missed pickups found in connection with consumer complaints, for a total penalty of \$3,230.
- \$100 for each of the seven violations of WAC 480-70-386(b)(i), related to the company's late response to consumer complaint 115667, for a total penalty of \$700.

Staff also recommends that Waste Management closely review the safety violations cited in this report, which constitute technical assistance. Future violations will result in additional enforcement action, including penalties.

## APPENDIX A

### Waste Management Strike Timeline

Date	Events / Communications
May 18	Commission letter to all solid waste companies reminding them that Commission staff had previously recommended that carriers update their tariffs to address labor-related work stoppages and not use the inclement weather provisions in their tariffs to address such service disruptions.
June 6	Waste Management of Washington Inc. (WM) files a tariff revision addressing company policy in the event of missed pick-ups due to labor disputes. The company requested an August 1 effective date.
June 15	Commission letter to Mike Weinstein at WM describing commission safety and service expectations in the event of a strike.
July 12	WM files a request to change the effective date of its June 2 tariff filing to September 1 at the request of staff.
July 25 Strike Day 1	Strike was called by Local 117; Polly McNeil, Attorney for WM contacted staff at 2:30 announcing the strike.  WM requests that the commission act on its tariff revision addressing company policy in the event of missed pick-ups due to labor disputes at the July 27 open meeting.
July 26 Strike Day 2	7:14 a.m. Email from Mary Evans at WM, - <i>"We will not provide collection services today," and "We remain hopeful the Union will permit members to return to work on Friday, July 27."</i>  10:00 a.m. Conference call between Staff, Mary Evans and Mike Weinstein of WM. The company told Staff that they expected their "green team" of replacement drivers would all be in the area by the end of the weekend. Following that they planned to restore service to priority customers first and then reestablish service to all customers. We understood they expected this would occur by mid-week.  10:51 a.m. Commission issued a statement to the media.
July 27 Strike Day 3	6:27 a.m. Email from Mary Evans: <i>"Per our contingency plan, we will increase limited collection service today, focusing on those accounts critical to public health and the environment. Candidly, some accounts will not be serviced today. We will prioritize the deployment of available service capacity. Substitute drivers have arrived; more are coming. As the number of activated Green Team members increases, so too will our service capacity."</i>  9:13 p.m. Second email from Mary Evans: <i>"Tomorrow we will continue our service recovery efforts using substitute drivers. We plan to move forward with hiring local</i>



Date	Events / Communications
	<p>drivers.”</p> <p>Commission took no action on proposed tariff filing at Open Meeting.</p>
<p><b>July 29</b> Strike Day 4</p>	<p>3:49 p.m. Email from Mary Evans: <i>“Over the weekend, our experienced Waste Management substitute drivers made progress servicing critical accounts in cities throughout Puget Sound. We prioritized service based on available resources ... The second wave of experienced WM substitute drivers has arrived. They attended orientation today (Sunday) and will be deployed on Monday morning. Additional waves of incoming drivers are scheduled. As the number of activated experienced WM substitute drivers increases, so too will our service capacity ... Collection service will focus on commercial accounts, including critical accounts and restaurants. Renton residential garbage customers will be serviced due to the unique nature of their every-other-week collection frequency.”</i></p>
<p><b>July 30</b> Strike Day 6</p>	<p>It had become apparent that, based on media reports, the company was restoring service more slowly than we understood would occur.</p> <p>1:25 p.m. Staff emailed the Company requesting a conference call update.</p> <p>1:40 p.m. Mary Evans responded <i>“Regrets - today is jammed. Perhaps later tonight (8pm?) or tomorrow. Thanks.”</i></p> <p>9:25 p.m. email from Mary Evans: <i>“Today our substitute drivers focused primarily on commercial accounts. While we made progress servicing the regular Monday commercial customers, we were unable to complete all of the routes in every community ... What to expect on Tuesday: Collection service will focus on commercial accounts, including critical accounts and restaurants. Renton residential garbage customers will be serviced due to the unique nature of their every-other-week collection frequency.”</i></p>
<p><b>July 31</b> Strike Day 7</p>	<p>1 p.m. Conference call between Company and staff.</p> <p>Staff expressed concerns about the apparently slow pace of service restoration and that, based on press reports, the company appeared to be allocating resources to restore service in contract cities but not in unincorporated areas.</p> <p>Staff asked for day-by-day customer service pick-up data and put the Company on notice that they would be required to provide this data after the strike. Staff also asked for detailed figures on the Green Team replacement drivers, and received no useful information in response.</p>

Date	Events / Communications
<b>August 1</b> Strike Day 8	<p data-bbox="451 384 1281 604">6:59 a.m. Email from Mary Evans - <i>"Despite Tuesday's disruption in the northern portion of our service area, our Puget Sound operations continued their focus on commercial garbage accounts – businesses, restaurants, hospitals, etc. As of this morning, we are expanding our recovery services to include <u>residential garbage collection</u> in many cities, including: Algona, Auburn, Bothell, Federal Way, Kirkland, Maple Valley, Mill Creek, Redmond, Seattle. Additionally, we are resuming residential recycling and yard waste collection in the City of Marysville."</i></p> <p data-bbox="451 625 1122 653"><b>NOTE: None of the cities listed above are UTC-regulated service areas.</b></p> <p data-bbox="451 667 1281 856">7:08 p.m. Email from Mary Evans stating the Company and Union had reached a "tentative agreement," and that "Teamsters Local 117, Local 174 and Local 231 will return to work tomorrow. The Local 174 <u>garbage</u> routes will run on the regular Thursday schedule for residential and commercial customers. Due to the accumulated excess material, our day may run longer than usual. Please urge residents to be patient as our collection time of day may vary from the regular schedule."</p>
<b>August 2</b> Strike Resolved	<p data-bbox="451 888 1281 978">Commission letter to Mr. Weinstein, notifying WM of the initiation of a Staff investigation, requesting specific data from the company, and inviting WM to a public meeting on August 9 to discuss the company's strike response strategy.</p> <p data-bbox="451 999 1281 1056">3:54 p.m. Email from Mary Evans: <i>"As part of our service recovery efforts, Waste Management will re-run routes from Wednesday, 8/1, on tomorrow, Saturday, 8/4.</i></p> <p data-bbox="451 1077 1281 1131"><i>Specifically, WUTC <u>Wednesday residential</u> customers will have the following recovery opportunities:</i></p> <ul data-bbox="492 1152 1281 1367" style="list-style-type: none"> <li data-bbox="492 1152 1281 1180">• <i>WUTC – between Federal Way &amp; Auburn: garbage, recycling, yard waste</i></li> <li data-bbox="492 1180 1281 1236">• <i>WUTC – King County Woodinville Area: garbage, yard waste, recycling ONLY if missed on Aug. 1<sup>st</sup></i></li> <li data-bbox="492 1236 1281 1293">• <i>WUTC – Northern Snohomish County: garbage, yard waste, recycling ONLY if missed on Aug. 1<sup>st</sup></i></li> <li data-bbox="492 1293 1281 1367">• <i>WUTC – Snohomish County Mountlake Terrace/Brier Area: garbage, yard waste, recycling ONLY if missed on Aug. 1<sup>st</sup></i></li> </ul> <p data-bbox="451 1388 1281 1409"><b>NOTE: This was the first information Staff received specific to UTC-regulated services.</b></p>

## APPENDIX B



STATE OF WASHINGTON

### WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250  
(360) 664-1160 • TTY (360) 586-8203

August 2, 2012

#### **Sent via US Mail and Electronic Mail**

Michael Weinstein  
Waste Management of Washington, Inc.  
720 4<sup>th</sup> Avenue Suite 400  
Kirkland, Washington 98033-8136

**Re: Company response to the strike by recycle and solid waste drivers –  
Request for information and notice of opening of investigation**

Dear Mr. Weinstein:

The Washington Utilities and Transportation Commission is pleased that Waste Management of Washington, Inc., has resolved its labor dispute resumed providing solid waste, recycling, and yard waste services to all its customers.

As this time, the commission intends to open a formal investigation of Waste Management of Washington's implementation of its contingency plan during this labor dispute and the impacts on its customers due to the company's inability to provide solid waste, recycling, and yard waste collection services.

Specifically, it appears that the resumption of residential collection services was more protracted than indicated in the company's contingency plan and the information we received in meetings with you and your staff. We seek to understand more fully your strike response and its impact on regulated customers.

We are also concerned that the company may not have allocated available replacement drivers equitably among UTC regulated and non-regulated service territories. According to news reports and customer complaints to the UTC, residential collection service resumed Tuesday in contract cities but not in the unincorporated areas where the UTC-regulated services are provided.

To assist us in our review, we request a detailed status report containing specific information about customer service restoration on each day of the strike. The daily reports during the strike

addressed the status of the strike generally but did not contain sufficient detail for us to assess the situation thoroughly.

The daily status reports should contain, at a minimum, the following information:

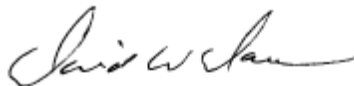
1. When were all replacement drivers in place and working?
2. When were normal solid waste, recycling and yard waste services restored to regulated priority customers identified in your contingency plan?
3. When were solid waste, recycling and yard waste services restored to the remainder of your customers in areas where services are regulated by the commission?
4. What days were these same services resumed to contract or unregulated service territories?
5. Who are the regulated priority customers in areas where services are regulated by the commission? Please provide a list. We may wish to contact some of those customers to better evaluate the services they received during the strike.

The commission has opened a formal investigation (Docket No. TG-121265) on this matter. The purpose of this investigation is to inform the commission of the company's actions during the strike and to inform potential future decisions, including whether penalties for tariff violations are appropriate. This matter has been added to the agenda of the August 9, 2012, Open Meeting, at which we expect the company to discuss its strike response strategy and data related to the number of drivers and the dates on which priority and other customers received service in both regulated and non-regulated service territories. The commission further intends to address, at least in a preliminary manner, the company's proposed tariff revision in Docket Nos. TG-120840, TG-120842, and TG-120843.

The commission will inform you in a separate correspondence of the time and place of the Open Meeting, which we intend to convene in a community within or near to your service territory. The commission intends to hear comment from members of the public about their service experiences during the strike.

Thank you for your attention to this matter.

Sincerely,



DAVID W. DANNER  
Executive Director and Secretary

## APPENDIX C



STATE OF WASHINGTON

### WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250  
(360) 664-1160 • TTY (360) 586-8203

August 24, 2012

Michael Weinstein  
Waste Management of Washington, Inc.  
720 – 4<sup>th</sup> Avenue Suite 400  
Kirkland, WA 98033-8136

Dear Mr. Weinstein:

The Utilities and Transportation Commission is conducting an investigation into the business practices of Waste Management of Washington, Inc., related to the service it provided during and subsequent to the labor strike that began on July 25, 2012.

To complete this investigation, commission staff requests the following information for each customer for each day beginning the day the strike commenced until all services missed during and subsequent to the strike were collected, and normal service resumed:

1. Customer Class: City (served by city contract) or UTC (UTC-certificated company).
2. Customer Category: Critical, Commercial Garbage, Commercial Recycling, Residential Garbage, Residential Recycling, Residential Yard Waste, or Biomedical.
3. Scheduled Service: Type (e.g. residential 1-can garbage, 1-yard container, etc.) and frequency of service (e.g., daily, weekly, etc.).
4. Missed Service: Date of each missed pick-up, date that each missed service was collected, and the number of business days between the date of missed service and the date that service was provided.

To understand how the company prioritized its resources during the strike, staff requests the following information for each day, beginning ten business days before the day the strike commenced (July 15, 2012) and continuing until ten business days past the date that normal service resumed (August 12, 2012):

5. The number of drivers sent out each day for garbage collection by category: residential, commercial, drop box, and biomedical.

Michael Weinstein  
August 24, 2012

6. The number of drivers sent out each day for recycling collection by category: residential (single family and multi-family) and commercial.
7. The number of drivers sent out each day for residential yard waste collection.

Commission staff requests the following additional information:

8. A copy of your labor dispute contingency plan.
9. An itemized list of all costs incurred (e.g., cost associated with the "Green Team" – transportation, training, housing, etc.), and savings realized (e.g., wages not paid to striking workers, avoided fuel costs, etc.), because of the strike.
10. Information regarding the Green Team:
  - a) How many Green Team members are there in the continental United States?
  - b) When did the company activate the Green Team?
  - c) How many members of the Green Team were called in?
  - d) Did requests related to the July 25 strike compete with Green Team requests in other areas of the country?
  - e) For each day of the strike, how many members of the Green Team arrived, and how many were used?
11. At the commission's August 9, 2012, Open Meeting, a consumer stated that a Waste Management employee collected his recycling, but not his neighbor's recycling, using a pickup truck. Please provide the following information for all non-traditional collection services the company provided for each day of the strike and continuing until all customers were restored to regularly scheduled service: a description of the service and how it was provided, the number of employees that participated in each service, and for each customer served, the information requested in items 1-4 above, for Customer Class, Customer Category, Scheduled Service, and Missed Service.
12. The name, title, telephone number, and e-mail address of the Waste Management of Washington, Inc., contact person that our staff can work with directly for questions that may arise concerning any details of the information you provide.

If you have questions regarding this request, the level of detail requested, or alternate data sets or alternate formats, please contact Rayne Pearson, Compliance Investigator. Ms. Pearson can be reached at (360) 664-1111, or by e-mail at [rpearson@utc.wa.gov](mailto:rpearson@utc.wa.gov). Staff requests that prior to the company collecting data and information, the company and staff meet to discuss the request. Please contact Ms. Pearson to set a date and time for this meeting.

All requested documents and information must be provided by September 24, 2012, in electronic format using Microsoft Word for narrative documents and Excel for data. The response should be directed to Ms. Pearson. Thank you for your attention to this matter.

Sincerely,



David W. Danner  
Executive Director and Secretary

APPENDIX D



720 Fourth Avenue, Suite 400  
Kirkland, WA 98033  
(425) 823-6164

October 1, 2012

VIA OVERNIGHT MAIL & E-MAIL

Rayne Pearson, Compliance Investigator  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Park Drive, SW  
P.O. Box 47250  
Olympia, WA 98504-7250

RECEIVED  
RECORDS MANAGEMENT  
2012 OCT -2 AM 11:59  
STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION  
COMMISSION

RE: Docket No. TG-121265 – Waste Management of Washington, Inc.  
(Certificate No. G-237) – Response to WUTC Data Requests

Dear Ms. Pearson:

I am submitting on behalf of Waste Management of Washington, Inc. (WMW) responses and objections to the above-referenced data request concerning the service disruptions during and following the labor strike that began on July 25, 2012. I am providing narrative responses to each of the specific requests for information stated in your letter of August 24, 2012, as further clarified by a meeting between WMW representatives and Commission staff on September 7, 2012. WMW appreciates the Commission's willingness to extend the deadline for submitting this response. Today with this timely email submission, I am also submitting in electronic format the exhibits referenced in the responses below. Today's email will be followed by an overnight delivery of paper copy documents.

As a threshold matter, however, it is important for the WUTC to understand what information is available, what information is either not available or not practically available, and what information is too valuable and sensitive to put into the public record. Of most significance is the fact that WMW does not track which specific customers have been serviced. As a result, WMW respectfully objects to the data requests seeking missed collection information on a customer-specific basis. This information is not reasonably available to WMW.

While WMW has collected a significant amount of information concerning its collection services during the strike and post-strike recovery period, WMW does not have the kind of customer-by-customer missed service information that staff requests. As was made clear at the meeting in September, this is not unique to a strike situation. Even under normal collection operations, WMW does not have data regarding missed collections in WUTC territories, but instead relies on reports from drivers and customers to ensure pickups are made timely. As a result, when a route was not completed during a strike day, it was not feasible for WMW to determine which customers were serviced before the driver ended his route. For example, the problem would have arisen on the first day of the strike because WMW's regular drivers began collection services that day, but broke off before the end of their routes when the strike was called at around 10:00 am on Wednesday, July 25. Likewise, if a WM Green Team temporary driver could not complete his or her route on a particular day, it would have been nearly impossible to determine what customers did not receive service, other than undertaking a hand

search of all route sheets and follow-up conversations with each driver at that time. Obviously, during WMW's "Super Saturday" collection blitz, WMW's drivers collected all containers that were placed curbside and did not record whether specific customers had or had not placed their containers out for collection. When the company's entire collection system was disrupted, the focus was on collecting as much material as possible, and instituting a means for tracking missed collections would have only distracted from those efforts.

Furthermore, while WMW has used its best efforts to ensure that the data collected and presented is accurate, some inaccuracies or inconsistencies may exist. During and after the strike, WMW was focusing its efforts on providing and restoring collection services as quickly as possible, and was not focused on verifying the accuracy of the data being collected. As WMW continues to review its data, we may need to update some of our responses if we find material discrepancies.

WMW also respectfully objects to data requests seeking information that is highly confidential, proprietary, and would cause a significant risk of severe competitive harm to WMW and its affiliates, and potentially jeopardize the underpinnings of union negotiations. In particular, any disclosure of the costs associated with activating the Green Team would significantly prejudice WMW and every other Waste Management subsidiary in all future labor negotiations. WMW understands that the WUTC regulations and its current interpretation of its authority under Chapter 81.77 RCW do not provide sufficient protections of highly confidential information to assure WMW that such information would not be disclosed in response to a Public Disclosure Act request or other similar inquiry. In the absence of any binding legal protection for this sensitive information, WMW is unwilling to submit those responses.

#### SPECIFIC RESPONSES

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*Request: To complete this investigation, commission staff requests the following information for each customer for each day beginning the day the strike commenced until all services missed during and subsequent to the strike were collected, and normal service resumed:*

- 1. Customer Class: City (served by city contract) or UTC (UTC-certificated company).*
- 2. Customer Category: Critical, Commercial Garbage, Commercial Recycling, Residential Garbage, Residential Recycling, Residential Yard Waste, or Biomedical.*
- 3. Scheduled Service: Type (e.g. residential 1-can garbage, 1-yard container, etc.) and frequency of service (e.g., daily, weekly, etc.).*
- 4. Missed Service: Date of each missed pick-up, date that each missed service was collected, and the number of business days between the date of missed service and the date that service was provided.*

**Response:** Notwithstanding the above objections and explanation, WMW is attaching several exhibits containing information responsive to these requests. Attached as **Exhibit 1** is a spreadsheet listing for WMW's WUTC collection territory in King and Snohomish Counties the customer counts by container/frequency of service (e.g., one 1-yard container 2x per week) and line of service (e.g., commercial garbage, residential yard waste). **Exhibit 2** presents this same information for customers serviced under city contracts in King and Snohomish Counties. Each



service type is listed separately for each customer, and includes customers receiving multiple services, such as a commercial customer who receives recycling, garbage, and yard waste services. Thus, the totals are not the number of customers, but the number of services within each territory.

With respect to “Critical Customers”, the customer counts in **Exhibits 1 and 2** include WMW’s Critical Customers in King and Snohomish Counties. The table below provides a separate count of Critical Customers, again broken out for WUTC and city territories.

	Commercial	Roll Off*	TOTAL
UTC	799	290	1,089
CITY	3,237	579	3,816

\*Represents roll off accounts serviced Jul 25 thru Aug 1

**Exhibits 1 and 2** do not however include medical waste customers. Because of the nature of medical waste collection services, there was no disruption in WMW’s medical waste collection services in King or Snohomish Counties during or after the strike.

Accordingly, **Exhibits 1 and 2** are responsive to Data Request Nos. 1-3, as further clarified by discussion at our meeting in September.

With respect to Data Request No. 4, and as mentioned above, WMW does not have information for determining which specific customers, or which service types were missed on a customer-by-customer or day-by-day basis, or for how long each customer went without receiving service. Of course, for any days when zero collection services were performed in a particular WUTC area (e.g., no residential solid waste collection services were performed during the period July 26-31), WMW can obviously conclude that all scheduled residential customer missed service. Where, however, partial collection services were provided, it is not practically possible to identify which customers received service and which ones did not.

As a substitute for that information, WMW has prepared **Exhibit 3**, which sets forth – by day and line of service – the number of scheduled routes for each day of the strike, the number of routes actually run, and the number of scheduled accounts in WMW’s WUTC territory in King and Snohomish Counties. For comparison purposes, this exhibit also includes the actual tonnage collected each day and the average tonnages collected on that day of the week during the three weeks preceding the strike. For reasons discussed at the September meeting, the actual tonnages versus prior average tonnages may or may not be an accurate surrogate for determining collection services completed. Factors relevant to the suitability of this measure include seasonal (e.g., declining green waste) and random variability, lower tonnages because customers did not set out cans, and higher tonnages because customers took advantage of the strike and set out more than their typical waste amounts (e.g., customers who took advantage of “Super Saturday” to clean out their garages). It is, nonetheless, the best information currently available to give some understanding of the number of collections made and missed on any given day during the work stoppage, and is Waste Management’s best good faith response to Data Request No. 4.

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*Request: To understand how the company prioritized its resources during the strike, staff requests the following information for each day, beginning ten business days before the day the strike commenced (July 15, 2012) and continuing until ten business days past the date that normal service resumed (August 12, 2012):*

*5. The number of drivers sent out each day for garbage collection by category: residential, commercial, drop box, and biomedical.*

*6. The number of drivers sent out each day for recycling collection by category: residential (single family and multi-family) and commercial.*

*7. The number of drivers sent out each day for residential yard waste collection.*

**Response:** Attached as **Exhibit 4** is a table that consolidates the information requested for these three data requests. The table provides, for each day between July 15<sup>th</sup> and August 12<sup>th</sup>, the number of drivers driving residential garbage, commercial garbage, drop box, biomedical, residential recycling, commercial recycling, and residential yard waste routes in all areas of King and Snohomish County (encompassing both contract city and WUTC areas). Please note that the “commercial garbage” and “commercial recycling” routes include some multi-family garbage and recycling where those customers are container-serviced, not cart-serviced routes.

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*Request: Commission staff requests the following additional information:*

*8. A copy of your labor dispute contingency plan.*

**Response:** A copy of the Waste Management’s 2012 Puget Sound Labor Disruption Contingency Plan is attached as **Exhibit 5**.

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*9. An itemized list of all costs incurred (e.g., cost associated with the “Green Team” - transportation, training, housing, etc.), and savings realized (e.g., wages not paid to striking workers, avoided fuel costs, etc.), because of the strike.*

**Response:** As noted previously, WMW objects to this request insofar as it requests information that is highly confidential, proprietary, and would cause a highly significant risk of severe competitive harm to WMW and its affiliates. WMW must therefore decline to provide the requested list of costs incurred in activating the Green Team.

Notwithstanding the objection above, WMW is attaching as **Exhibit 6** a spreadsheet that provides a summary of certain costs incurred during the strike and a comparison of those costs against prior months and against the same months from the prior year. These costs do **not** include the costs for the Green Team members, which would include their labor costs, travel costs, hotel and food costs, and security costs. It also does **not** include other costs related to the strike, such as legal costs. The costs provided are the direct labor costs for WMW’s **regular** drivers, fuel, disposal costs, and other operating, maintenance and depreciation. The attached cost comparison shows that, even excluding the Green Team labor, deployment, and security costs, WMW’s overall costs were 1.3% higher for the two-month July-August period encompassing the strike as compared to the prior 12-month average. When compared with the same two-month period in 2011, WMW’s costs were essentially the same (i.e., only 0.1%

higher). While year-over-year and month-to-month comparisons will reflect other operational changes, these numbers provide further evidence that WMW did not realize any savings because of the strike; rather, WMW incurred significantly higher costs because of the strike when the normal operating costs and significant costs from the Green Team deployment are considered.

---

*10. Information regarding the Green Team:*

*a) How many Green Team members are there in the continental United States?*

**Response:** The "official" number of Green Team members fluctuates depending upon attrition and staffing needs of the various districts where they normally work. In strike planning, Waste Management typically anticipates activating over 400 Green Team members depending on circumstances and availability.

*b) When did the company activate the Green Team?*

**Response:** As the Local 117 collective bargaining agreement terminated on May 31, 2012, WMW did not know if and when the union would call a strike or whether any other unions would honor the Local 117 picket lines. As a result, there was genuine uncertainty as to when or even if a strike would be called. When the contract expired, the Green Team was put on alert status, but not physically deployed to the Puget Sound area. Green Team managers, however, were brought in early to receive training and familiarization with local operations immediately following the expiration of the agreement. Without knowing when or if the strike would be called, it was impractical from a cost and operations disruption standpoint to stage indefinitely large numbers of Green Team members in the Puget Sound area. When Local 117 called the strike on July 25<sup>th</sup>, the Green Team was officially activated.

*c) How many members of the Green Team were called in?*

**Response:** The entire Green Team was activated once the strike officially began on Wednesday, July 25<sup>th</sup>. Due to obvious logistical issues, Green Team members arrived in waves over the course of the strike. When WMW and union representatives reached a settlement on Wednesday evening, August 1<sup>st</sup>, 266 Green Team members had arrived and would have been available to work the following day. Additional Green Team members were either in transit or scheduled to arrive within 24 hours. See response to (e) below.

*d) Did requests related to the July 25 strike compete with Green Team requests in other areas of the country?*

**Response:** WMW's Green Team members are used in different circumstances and not exclusively strike situations. At the time of the July 25<sup>th</sup> strike, Green Team members had been deployed to other WMW locations that needed assistance because of local staffing issues.

*e) For each day of the strike, how many members of the Green Team arrived, and how many were used?*

**Response:** The table below summarizes the number of Green Team members who arrived on each day of the strike, the cumulative total who had arrived by each day of the strike, and the

number of Green Team members who deployed for collection services on each day of the strike. While Green Team members began arriving on Thursday, there are several reasons for the gap between the arrival day and actual deployment day. First, for safety concerns, WMW does not operate in a strike situation until full security measures are in place. Here, security was not in place until Friday, July 27<sup>th</sup>. Second, replacement drivers must be fully processed to ensure compliance with federal, state, and local laws and regulations before dispatched to work, whether they be Green Team members or local resources. On the last day of the strike, Wednesday August 1, WMW had deployed 166 Green Team members for collection services and another 21 members as technicians and equipment operators. If the strike had continued, that number would have increased substantially on Thursday and over the weekend.

Green Team Utilization - Puget Sound Strike					
Date	Day	Green Team Arrival by Day	Cumulative Green Team	Green Team Used for Collection Services	Green Team Technicians and Equipment Operators
26-Jul	Thu	10	10	-	-
27-Jul	Fri	12	22	9	-
28-Jul	Sat	52	74	24	-
29-Jul	Sun	12	86	-	-
30-Jul	Mon	40	126	79	7
31-Jul	Tue	75	201	84	15
1-Aug	Wed	65	266	166	21
2-Aug	Thu	-	All depart	-	-

11. At the commission's August 9, 2012, Open Meeting, a consumer stated that a Waste Management employee collected his recycling, but not his neighbor's recycling, using a pickup truck. Please provide the following information for all non-traditional collection services the company provided for each day of the strike and continuing until all customers were restored to regularly scheduled service: a description of the service and how it was provided, the number of employees that participated in each service, and for each customer served, the information requested in items 1-4 above, for Customer Class, Customer Category, Scheduled Service, and Missed Service.

**Response:** While it is not clear what is meant by "non-traditional collection services", WMW assumes that the WUTC intends this term to mean collection services similar to the one example cited (i.e., one specific customer collected with a pickup truck). We do not understand the term to encompass collection services that differed from a typical collection day, such as collection of Critical Customers or collection on days other than scheduled collection days, such as "Super Saturday." WMW has made inquiry of its route managers and other persons knowledgeable about the collection operations during the strike. To the best of our knowledge, we are not aware of any other circumstances where WMW provided any "non-traditional collection services" to WUTC customers.

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*12. The name, title, telephone number, and e-mail address of the Waste Management of Washington, Inc., contact person that our staff can work with directly for questions that may arise concerning any details of the information you provide.*

**Response:** I will continue to be the WMW contact person to work with your staff on questions that may arise concerning this response. My contact information is provided on the above letterhead. My e-mail address is [mweinst@wm.com](mailto:mweinst@wm.com).

\* \* \*

If you have any questions or concerns, please feel free to call me at (425) 814-7840.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Weinstein", with a stylized flourish extending to the right.

Michael Weinstein

**City Contract Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 2**

Scheduled Service	Commercial Garbage	Commercial Recycling	Commercial Yard Waste	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste	Grand Total
005 10 Gal Tower 5/L				96						96
03L 3 YD LUGGER							1			1
04L 4 YD LUGGER							3			3
06L 6 YD LUGGER							5			5
08L 8 YD LUGGER							4			4
09M 10 - 32 GAL CANS MSW	2									2
09X 10 YD LUGGER TEMPORARY CDL										
09M 10-64 GAL CARTS MSW	13									13
09M 10-96 GAL CARTS MSW	1									1
05D 10-64 GAL CRT SINGLE STREAM RCY		32								32
05E 10-96 GAL CRT SINGLE STREAM RCY		195								195
07L 10 YD LUGGER TEMPORARY							2			2
07L 10 YD RECYCLE TEMPORARY								27		27
07L 10 YD LUGGER RECYCLE								4		4
10C 10 YD COMPACTOR							7			7
10D 10 YD ROLLOFF CDL							1			1
10F 10 YD FLAT ROLLOFF RECYCLE								6		6
10L 10 YD LUGGER							13			13
10M 10 YD ROLLOFF CO-MINGLED								2		2
10D 10 YD ROLLOFF							5			5
10T 10 YD ROLLOFF TEMPORARY							4			4
10Y 10 YD ROLLOFF RECYCLE								13		13
111 1-1 YD 1X PER WEEK	1,650									1,650
112 1-1 YD 2X PER WEEK	45									45
113 1-1 YD 3X PER WEEK	6									6
114 1-1 YD 4X PER WEEK	1									1
121 1-2 YD 1X PER WEEK	1,373									1,373
122 1-2 YD 2X PER WEEK	123									123
123 1-2 YD 3X PER WEEK	27									27
124 1-2 YD 4X PER WEEK	4									4
125 1-2 YD 5X PER WEEK	1									1
131 1-3 YD 1X PER WEEK	930									930
132 1-3 YD 2X PER WEEK	194									194
133 1-3 YD 3X PER WEEK	51									51
134 1-3 YD 4X PER WEEK	8									8
135 1-3 YD 5X PER WEEK	5									5
136 1-3 YD 6X PER WEEK	3									3
141 1-4 YD 1X PER WEEK	1,165									1,165
142 1-4 YD 2X PER WEEK	326									326
143 1-4 YD 3X PER WEEK	113									113
144 1-4 YD 4X PER WEEK	20									20
145 1-4 YD 5X PER WEEK	22									22
146 1-4 YD 6X PER WEEK	7									7
147 1-4 YD 7X PER WEEK	3									3

**City Contract Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 2**

Scheduled Service	Commercial Garbage	Commercial Recycling	Commercial Yard Waste	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste	Grand Total
151 1-1.5 YD 1X PER WEEK	456									456
152 1-1.5 YD 2X PER WEEK	25									25
153 1-1.5 YD 3X PER WEEK	2									2
154 1-1.5 YD 4X PER WEEK	1									1
155 1-1.5 YD 5X PER WEEK	2									2
15C 15 YD COMPACTOR						31				31
15D 15 YD ROLLOFF CDL						1				1
15D 15 YD ROLLOFF						5				5
15T 15 YD ROLLOFF TEMPORARY						5				5
15Y 15 YD ROLLOFF RECYCLE						1				1
161 1-6 YD 1X PER WEEK	713									713
162 1-6 YD 2X PER WEEK	243									243
163 1-6 YD 3X PER WEEK	58									58
164 1-6 YD 4X PER WEEK	6									6
165 1-6 YD 5X PER WEEK	8									8
181 1-8 YD 1X PER WEEK	539									539
182 1-8 YD 2X PER WEEK	244									244
183 1-8 YD 3X PER WEEK	101									101
184 1-8 YD 4X PER WEEK	13									13
185 1-8 YD 5X PER WEEK	14									14
186 1-8 YD 6X PER WEEK	1									1
LAM 1-32 GAL CAN MSW	115									115
LCS 15 YD CLOSED RECEIVER BOX RCY							2			2
LDM 1-64 GAL CART MSW	583									583
LEM 1-96 GAL CART MSW	1,049									1,049
LFE 1 YD MSW EOW	222									222
LFG 1 YD FEL GRN/YDN			9							9
LFM 1 YD MSW 1X MO	66									66
LMY 1 YD MULTIFAMILY RCY		63								63
LDE 1 YD OCC EOW		22								22
LDM 1 YD OCC 1X MO		2								2
LPP 1 YD PAPER PER UNIT		15								15
LPT 1 YD MSW TEMP PER UNIT	2									2
LCO 1-1.25 YD 1X PER WEEK	1									1
L51 1-1 YD SINGLE STREAM RCY			494							494
L52 1-2 YD SINGLE STREAM RCY			559							559
L53 1-3 YD SINGLE STREAM RCY			361							361
L54 1-4 YD SINGLE STREAM RCY			583							583
L55 1-1.5 YD SINGLE STREAM RCY			147							147
L56 1-6 YD SINGLE STREAM RCY			256							256
L58 1-8 YD SINGLE STREAM RCY			280							280
L5A 1-64 GAL CRT SINGL STRM RCY EOW		9								9
L5D 1-64 GAL CRT SINGL STREAM RCY	50									50

**City Contract Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 2**

Scheduled Service	Commercial Garbage	Commercial Recycling	Commercial Yard Waste	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste	Grand Total
15E 1-96 GAL CART SINGLE STREAM RCY		2,162								2,162
15F 1-96 GAL CRT SINGL STRM RCY EOW		10								10
172 20 GAL CART MSW	40									40
17E 1 YD TAG EOW		1								1
1Y1 1 YD RCY 1X WK		334								334
1Y2 1 YD RCY 2X WK		14								14
1Y3 1 YD RCY 3X WK		2								2
1Y6 1 YD RCY EOW		72								72
1YM 1 YD RCY 1X MO		8								8
20A 20 YD ORGANICS							132		2	132
20C 20 YD COMPACTOR							9			9
20D 20 YD ROLLOFF COIL								14		14
20E 20 YD FLAT ROLLOFF RECYCLE										
20G 20 YD GREEN/YARD WASTE									3	3
20M 20 GAL MSW 1X MO				15						15
20N 20 YD ROLLOFF CO-MINGLED								9		9
20N 1-20 GAL CAN	2									2
20N 70 YD ROLLOFF CO-MINGLED TEMP								1		1
20O 20 YD ROLLOFF							143			143
20Y 20 YD ROLLOFF TEMPORARY							34			34
20Y 20 YD ROLLOFF RECYCLE								59		59
211 2-1 YD 1X PER WEEK	5									5
212 2-1 YD 2X PER WEEK	3									3
221 2-2 YD 1X PER WEEK	37									37
222 2-2 YD 2X PER WEEK	11									11
223 2-2 YD 3X PER WEEK	1									1
22T 2-20 GAL CARTS MSW				1						1
231 2-3 YD 1X PER WEEK	35									35
232 2-3 YD 2X PER WEEK	21									21
233 2-3 YD 3X PER WEEK	5									5
241 2-4 YD 1X PER WEEK	62									62
242 2-4 YD 2X PER WEEK	40									40
243 2-4 YD 3X PER WEEK	19									19
244 2-4 YD 4X PER WEEK	1									1
245 2-4 YD 5X PER WEEK	1									1
247 2-4 YD 7X PER WEEK	1									1
251 2-1.5 YD 1X PER WEEK	3									3
252 2-1.5 YD 2X PER WEEK	3									3
253 2-1.5 YD 3X PER WEEK	1									1
25C 25 YD COMPACTOR							98			98
25F 25 YD FLAT ROLLOFF RECYCLE									2	2
25G 25 YD GREEN/YARD WASTE									1	1
25M 25 YD ROLLOFF CO-MINGLED								1		1



**City Contract Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 2**

Scheduled Service	Commercial Garbage	Commercial Recycling	Commercial Yard Waste	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste	Grand Total
250 25 YD ROLLOFF							35	2		35
25T 25 YD ROLLOFF TEMPORARY							2			2
25Y 25 YD ROLLOFF RECYCLE								13		13
261 2-6 YD 1X PER WEEK	48									48
262 2-6 YD 2X PER WEEK	16									16
263 2-6 YD 3X PER WEEK	5									5
27C 27 YD COMPACTOR							1			1
281 2-8 YD 1X PER WEEK	30									30
282 2-8 YD 2X PER WEEK	18									18
283 2-8 YD 3X PER WEEK	7									7
284 2-8 YD 4X PER WEEK	1									1
285 2-8 YD 5X PER WEEK	1									1
2AM 2-32 GAL CANS MSW	43									43
2BM 2-35 GAL CANS MSW	2									2
2C1 2 YD COMPACTOR 1X WK	22									22
2C2 2 YD COMPACTOR 2X WK	5									5
2C3 2 YD COMPACTOR 3X WK	1									1
2C5 2 YD COMPACTOR 5X WK	1									1
2DM 2-64 GAL CARTS MSW	93									93
2DT 20 YD ROLLOFF TEMPORARY CDL							18			18
2EM 2-96 GAL CARTS MSW	209									209
2FE 2 YD MSW EOW	103									103
2FG 2 YD BEL SRN/TDW			33							33
2FM 2 YD MSW 1X MO	34									34
2MY 2 YD MULTIFAMILY RCY		46								46
2OE 2 YD OCC EOW		34								34
2OM 2 YD OCC 1X MO		7								7
2OF 2 YD FOOD PLUS RCY			1							1
2PP 2 YD PAPER PER UNIT		11								11
2PT 2 YD MSW TEMP PER UNIT	9									9
2SD 2-64 GAL CART SINGLE STREAM RCY		67								67
2SE 2-96 GAL CART SINGLE STREAM RCY		707								707
2T2 2-20 GAL CARTS MSW	1									1
2TE 2 YD TAG EOW		3								3
2TG 2 YD TAG		3								3
2TY 20 YD RECYCLE TEMPORARY								64		64
2Y1 2 YD RCY 1X WK		343								343
2Y2 2 YD RCY 2X WK		58								58
2Y3 2 YD RCY 3X WK		11								11
2Y5 2 YD RCY 5X WK		1								1
2Y6 2 YD RCY EOW		72								72
2YM 2 YD RCY 1X MO		6								6
30C 30 YD COMPACTOR							194			194

**City Contract Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 2**

Scheduled Service	Commercial Garbage	Commercial Recycling	Commercial Yard Waste	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste	Grand Total
300 30 YD ROLLOFF CDL							2	18		20
306 30 YD FLAT ROLLOFF RECYCLE								5		5
306 30 YD GREEN/YARD WASTE								20		20
30M 30 YD ROLLOFF CO-MINGLED							168			168
300 30 YD ROLLOFF							41			41
30T 30 YD ROLLOFF TEMPORARY								93		93
30V 30 YD ROLLOFF RECYCLE										
311 3-1 YD 1X PER WEEK	1									1
321 3-2 YD 1X PER WEEK	5									5
322 3-2 YD 2X PER WEEK	3									3
331 3-3 YD 1X PER WEEK	9									9
332 3-3 YD 2X PER WEEK	7									7
333 3-3 YD 3X PER WEEK	1									1
341 3-4 YD 1X PER WEEK	11									11
342 3-4 YD 2X PER WEEK	9									9
343 3-4 YD 3X PER WEEK	4									4
345 3-4 YD 5X PER WEEK	1									1
351 3-5 YD 1X PER WEEK	1									1
352 3-5 YD 2X PER WEEK	1									1
35C 3S YD COMPACTOR							7			7
361 3-6 YD 1X PER WEEK	16									16
362 3-6 YD 2X PER WEEK	9									9
381 3-8 YD 1X PER WEEK	12									12
382 3-8 YD 2X PER WEEK	4									4
383 3-8 YD 3X PER WEEK	1									1
3AW 3-32 GAL CANVS MSW	14									14
300 30 YD CLOSED RECEIVER BOX RCY								3		3
3C1 3 YD COMPACTOR 1X WK	30									30
3C2 3 YD COMPACTOR 2X WK	8									8
3DM 3-64 GAL CARTS MSW	19									19
3DT 30 YD ROLLOFF TEMPORARY CDL							2			2
3EM 3-96 GAL CARTS MSW	59									59
3FE 3 YD MSW EDW	91									91
3FM 3 YD MSW 1X MO	23									23
3MY 3 YD MULTIFAMILY RCY		40								40
3OE 3 YD OCC EDW		8								8
3OM 3 YD OCC 1X MO		1								1
3PT 3 YD MSW TEMP PER UNIT	10									10
3SD 3-64 GAL CART SINGLE STREAM RCY		4								4
3SE 3-96 GAL CART SINGLE STREAM RCY		292								292
3TY 30 YD RECYCLE TEMPORARY								106		106
3Y1 3 YD RCY 1X WK		274								274

**City Contract Area Customer Count by Category and Service  
King and Snohomish Counties  
Exhibit 2**

Scheduled Service	Commercial Garbage	Commercial Recycling	Commercial Yard Waste	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste	Grand Total
3Y2 3 YD RCY 2X WK		49								49
3Y3 3 YD RCY 3X WK		16								16
3Y4 3 YD RCY 4X WK		1								1
3Y5 3 YD RCY 5X WK		2								2
3Y6 3 YD RCY 6X WK		22								22
3Y7 3 YD RCY 7X WK		1								1
3Y8 3 YD RCY 8X WK		1								1
3Y9 3 YD FEL REC ON CALL										
45F 4YD FEL SHARED CONTAINER	8									8
40C 40 YD COMPACTOR							74			74
40D 40 YD ROLLOFF CDL							6			6
40F 40 YD FLAT ROLLOFF RECYCLE										
40G 40 YD GREEN/YARD WASTE										
40M 40 YD ROLLOFF CO-MINGLED									1	1
40O 40 YD ROLLOFF								15		15
40T 40 YD ROLLOFF TEMPORARY										
40Y 40 YD ROLLOFF RECYCLE							80			80
422 4-2 YD 1X PER WEEK	3						34			34
423 4-2 YD 2X PER WEEK	1									1
431 4-3 YD 1X PER WEEK	8									8
432 4-3 YD 2X PER WEEK	3									3
441 4-4 YD 1X PER WEEK	8									8
442 4-4 YD 2X PER WEEK	7									7
443 4-4 YD 3X PER WEEK	2									2
444 4-4 YD 4X PER WEEK	1									1
455 45 GAL TOTES 5/L				148						148
461 4-6 YD 1X PER WEEK	9									9
462 4-6 YD 2X PER WEEK	3									3
481 4-8 YD 1X PER WEEK	7									7
482 4-8 YD 2X PER WEEK	3									3
4AM 4-32 GAL CANS MSW	14									14
4C0 40 YD CLOSED RECEIVER BOX RCY										
4C1 4 YD COMPACTOR 1X WK	21							1		21
4C2 4 YD COMPACTOR 2X WK	7									7
4C3 4 YD COMPACTOR 3X WK	2									2
4C4 4 YD COMPACTOR 4X WK	1									1
4CE 4 YD COMPACTOR FOW	2									2
4DM 4-64 GAL CARTS MSW	26									26
4DT 40 YD ROLLOFF TEMPORARY CDL							10			10
4EM 4-96 GAL CARTS MSW	30									30
4FE 4 YD MSW 6OW	92									92
4FG 4 YD FEL GRN/YDW			1							1
4FM 4 YD MSW 1X MIO	34									34
4MY 4 YD MULTIFAMILY RCY		39								39

**City Contract Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 2**

Scheduled Service	Commercial Garbage	Commercial Recycling	Commercial Yard Waste	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste	Grand Total
40E 4 YD OCC EOW		13								13
40M 4 YD OCC 1X MO		6								6
APT 4 YD MSW TEMP PER UNIT	17									17
ASD 4-64 GAL CART SINGLE STREAM RCY		8								8
ASE 4-96 GAL CART SINGLE STREAM RCY		117								117
ATL 4 YD LUGGER TEMPORARY							5			5
ATY 40 YD RECYCLE TEMPORARY								51		51
AY1 4 YD RCY 1X WK		247								247
AY2 4 YD RCY 2X WK		118								118
AY3 4 YD RCY 3X WK		22								22
AY4 4 YD RCY 4X WK		3								3
AY5 4 YD RCY 5X WK		6								6
AY6 4 YD RCY EOW		22								22
AYL 4 YD LUGGER RECYCLE								2		2
4YM 4 YD RCY 1X MO		4								4
4YQ 4 YD FEL REC ON CALL		1					2			3
500 50 YD ROLLOFF										
50Y 50 YD ROLLOFF RECYCLE								8		8
512 5-1 YD 2X PER WEEK	1									1
522 5-2 YD 2X PER WEEK	1									1
541 5-4 YD 1X PER WEEK	3									3
542 5-4 YD 2X PER WEEK	7									7
543 5-4 YD 3X PER WEEK	1									1
561 5-6 YD 1X PER WEEK	3									3
562 5-6 YD 2X PER WEEK	2									2
581 5-8 YD 1X PER WEEK	3									3
582 5-8 YD 2X PER WEEK	3									3
5AM 5-32 GAL CARTS MSW	10									10
5DM 5-64 GAL CARTS MSW	39									39
5EM 5-96 GAL CARTS MSW	10									10
5FE 1.5 YD MSW EOW	33									33
5FG 1.5 YD FEL GRN/YDW			1							1
5FM 1.5 YD MSW 1X MO										
5MP 1.5 YD MULTIFAMILY RCY	4									4
5OE 1.5 YD OCC EOW		10								10
5SE 5-96 GAL CART SINGLE STREAM RCY		1								1
5T2 5-20 GAL CARTS MSW		57								57
5T2 5-20 GAL CARTS MSW	4									4
5Y1 1.5 YD RCY 1X WK		54								54
5Y2 1.5 YD RCY 2X WK		2								2
5YE 1.5 YD RCY EOW		6								6
5YM 1.5 YD RCY 1X MO		1								1
641 5-4 YD 1X PER WEEK	3									3
661 6-6 YD 1X PER WEEK	2									2

**City Contract Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 2**

Scheduled Service	Commercial Garbage	Commercial Recycling	Commercial Yard Waste	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste	Grand Total
681 6-8 YD 1X PER WEEK	4									4
682 6-8 YD 2X PER WEEK	1									1
683 6-8 YD 3X PER WEEK	1									1
6C1 6 YD COMPACTOR 1X WK	21									21
6C2 6 YD COMPACTOR 2X WK	10									10
6C3 6 YD COMPACTOR 3X WK	4									4
6CE 6 YD COMPACTOR EDW	2									2
6CM 6 YD COMPACTOR 1X MO	2									2
6DM 6-64 GAL CARTS MSW	3									3
6EM 6-96 GAL CARTS MSW	6									6
6FE 6 YD MSW EDW	47									47
6FM 6 YD MSW 1X MO	17									17
6MY 6 YD MULTIFAMILY RCY		12								12
6OC 6 YD COMPACTOR FOOD PLUS RCY			1							1
6OE 6 YD OCC EDW		8								8
6PT 6 YD MSW TEMP PER UNIT	35									35
6RL 6 YD COMPACTOR RCY 1X WK		1								1
6SD 6-64 GAL CART SINGLE STREAM RCY		1								1
6SE 6-96 GAL CART SINGLE STREAM RCY		70								70
6Y1 6 YD RCY 1X WK		133								133
6Y2 6 YD RCY 2X WK		45								45
6Y3 6 YD RCY 3X WK		13								13
6Y4 6 YD RCY 4X WK		3								3
6Y5 6 YD RCY 5X WK		1								1
6Y6 6 YD RCY EDW		9								9
6YL 6 YD LUGGER RECYCLE								1		1
6YM 6 YD RCY 1X MO		3								3
6YD 6 YD FEL REC ON CALL		1								1
721 7-2 YD 1X PER WEEK	1									1
741 7-4 YD 1X PER WEEK	1									1
742 7-4 YD 2X PER WEEK	1									1
761 7-6 YD 1X PER WEEK	1									1
781 7-8 YD 1X PER WEEK	1									1
7DM 7-64 GAL CARTS MSW	3									3
7SD 7-64 GAL CART SINGLE STREAM RCY		3								3
7SE 7-96 GAL CART SINGLE STREAM RCY		31								31
831 8-3 YD 1X PER WEEK	1									1
84M 8-32 GAL CANS MSW	1									1
8DM 8-64 GAL CARTS MSW	3									3
8FE 8 YD MSW EDW	40									40
8FM 8 YD MSW 1X MO	14									14
8MY 8 YD MULTIFAMILY RCY		10								10
8OE 8 YD OCC EDW		9								9

**City Contract Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 2**

Scheduled Service	Commercial Garbage	Commercial Recycling	Commercial Yard Waste	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste	Grand Total
BPP 8 YD PAPER PER UNIT	21	4								4
BPT 8 YD MSW TEMP PER UNIT										21
BSE 8-96 GAL CART SINGLE STREAM RCY		30								30
BY1 8 YD RCY 1X WK		114								114
BY2 8 YD RCY 2X WK		48								48
BY3 8 YD RCY 3X WK		16								16
BY4 8 YD RCY 4X WK		2								2
BY5 8 YD RCY 5X WK		4								4
BYE 8 YD RCY EOW		9								9
BYL 8 YD LUGGER RECYCLE						4				4
BYM 8 YD RCY 1X MO		4								4
BZ1 9-3 YD 1X PER WEEK	1									1
BZ2 9-4 YD 2X PER WEEK	2									2
BZM 9-96 GAL CARTS MSW	1									1
BSE 9-96 GAL CART SINGLE STREAM RCY		31								31
AB0 12-32 GAL CANS MSW	1									1
AGF 32 GAL CAN YDW			11							11
AH0 18-32 GAL CANS MSW	1									1
AME 32 GAL CAN MSW EOW	25									25
AMM 32 GAL CAN MSW 1X MO	9									9
AV1 32 GAL CAN RCY 1X WK		1								1
BA0 21-32 GAL CANS MSW	2									2
BDD 24-32 GAL CANS MSW	2									2
BFO 26-32 GAL CANS MSW	1									1
BMV BIN MULTIFAMILY FLAT		6								6
BNR BIN RECYCLE FLAT		197								197
BNR RECYCLE BINS RS					1					1
C0D 30-64 GAL CARTS MSW	8									8
C11 1-30 GAL MINI CAN MSW				1,584						1,584
C12 2-30 GAL MINI CAN MSW				3						3
C21 1-20 GAL MINI CAN MSW				2,676						2,676
C22 2-20 GAL MINI CAN MSW				1						1
C2T 20 GAL CART MSW				11,044						11,044
C30 30 YD CLOSED RECEIVER BOX							7			7
C31 1-32 GAL CAN MSW				7,549						7,549
C32 2-32 GAL CANS MSW				440						440
C33 3-32 GAL CANS MSW				10						10
C34 4-32 GAL CANS MSW				3						3
C3M 32 GAL CAN MSW 1X MO				189						189
C40 40 YD CLOSED RECEIVER BOX				4						4
CAT 11-35 GAL CARTS MSW	3							1		4
CRT 12-35 GAL CARTS MSW	5									5

**City Contract Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 2**

Scheduled Service	Commercial		Residential		Residential		Residential		Roll Off		Grand Total
	Garbage	Recycling	Yard Waste	Garbage	Recycling	Yard Waste	Garbage	Recycling	Yard Waste	Roll Off	
CCT 13-35 GAL CARTS MSW	2										2
CCT 14-35 GAL CARTS MSW	2										2
CET 15-35 GAL CARTS MSW	3										3
CFT 16-35 GAL CARTS MSW	4										4
CGF 35 GAL CART YDW			2								2
CHT 18-35 GAL CARTS MSW	2										2
CHT 19-35 GAL CARTS MSW	5										5
CMI 35 GAL CART MSW 1X WK	462										462
CMI 35 GAL CART MSW 1X MO	1										1
CMI 35 GAL CART MSW ON CALL	1										1
CNY 35 GAL CART MULTIFAMILY RCY		59									59
CT0 10-35 GAL CARTS MSW	24										24
CT2 1-35 GAL CARTS MSW	187										187
CT3 3-35 GAL CARTS MSW	64										64
CT4 4-35 GAL CARTS MSW	179										179
CTS 5-35 GAL CARTS MSW	16										16
CT6 6-35 GAL CARTS MSW	25										25
CT7 7-35 GAL CARTS MSW	6										6
CT8 8-35 GAL CARTS MSW	17										17
CT9 9-35 GAL CARTS MSW	4										4
CT1 35 GAL CART RCY 1X WK		60									60
CZT 20-35 GAL CARTS MSW	14										14
DG1 1-64 GAL CART YDW			9								9
DGF 64 GAL CART YDW			4								4
DVE 64 GAL CART MSW EOW	86										86
DNM 64 GAL CART MSW 1X MO	16										16
DNM 64 GAL CART MULTIFAMILY NEWS	14										14
DND 64 GAL CART MSW ON CALL	3										3
DNP 64 GAL CART MULTIFAMILY PAPER	17										17
DMT 64 GAL CART MULTIFAMILY TAG	18										18
DNY 64 GAL CART MULTIFAMILY RCY	43										43
DPF 64 GAL CART PAPER	29										29
DT1 64 GAL CART TAG	7										7
DY1 64 GAL CART RCY 1X WK		265									265
DY2 64 GAL CART RCY 2X WK		1									1
DYE 64 GAL CART RCY EOW		422									422
DYM 64 GAL CART RCY 1X MO		3									3
EGE 96 GAL CART YDW PER UNIT			5								5
EGF 96 GAL CART YDW			788								788
EM2 96 GAL CART MSW 2X WK	42										42
EM3 96 GAL CART MSW 3X WK	10										10
EME 96 GAL CART MSW EOW	148										148
EMS 96 GAL MULTIFAMILY YDW PU			2								2

**City Contract Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 2**

Scheduled Service	Commercial Garbage	Commercial Recycling	Commercial Yard Waste	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste	Grand Total
EMM 96 GAL CART MSW 1X MO	31									31
EMO 96 GAL CART MSW ON CALL	1									1
EMP 96 GAL CART MULTIFAMILY PAPER		142								142
EMT 96 GAL CART MULTIFAMILY TAG		56								56
EMY 96 GAL CART MULTIFAMILY RCY		125								125
ENF 96 GAL CART NEWS		99								99
EOF 96 GAL CART OCC		7								7
EPF 96 GAL CART PAPER		132								132
ETF 96 GAL CART TAG EDW		6								6
ETF 96 GAL CART TAG		200								200
EY1 96 GAL CART RCY 1X WK		289								289
EY2 96 GAL CART RCY 2X WK		1								1
EYE 96 GAL CART RCY EDW		1,902								1,902
EYM 96 GAL CART RCY 1X MO		3								3
EYO 96 GAL CART RCY ON CALL		2								2
F50 50 YD FLAT ROLLOFF							2			2
S31 1-32 GAL CAR YDW							2			2
G30 32 GAL CAN YDW ON CALL							1			1
G51 1-35 GAL CART YDW							2,182			2,182
G61 1-64 GAL CART YDW							2,870			2,870
G62 2-64 GAL CARTS YDW							6			6
G81 1-96 GAL CART YDW							100,199			100,199
G82 2-96 GAL CARTS YDW							1,550			1,550
G93 3-96 GAL CARTS YDW							108			108
G94 4-96 GAL CARTS YDW							14			14
G95 5-96 GAL CARTS YDW							4			4
G97 7-96 GAL CARTS YDW							1			1
G98 8-96 GAL CARTS YDW							2			2
G99 9-96 GAL CARTS YDW							1			1
G90 96 GAL CART YDW ON CALL							3			3
G6F 13 GAL CART YDW							1			1
O1E 1 YD ORGANICS EDW							1			1
O61 1-64 GAL FOOD WASTE CART 2X WK							74			74
O62 2-64 GAL FOOD WASTE CART 2X WK							96			96
O63 3-64 GAL FOOD WASTE CART 2X WK							3			3
O64 4-64 GAL FOOD WASTE CART 2X WK							3			3
O66 6-64 GAL FOOD WASTE CART 2X WK							1			1
O68 8-64 GAL FOOD WASTE CART 2X WK							1			1
O6C 64 GAL TOTER ORGANICS							17			17
O91 1-96 GAL FOOD WASTE CART 2X WK							8			8
O92 2-96 GAL FOOD WASTE CART 2X WK							7			7
O9C 96 GAL TOTER ORGANICS							40			40
O90 96 GAL ORGANICS ON CALL							2			2



**City Contract Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 2**

Scheduled Service	Commercial		Residential		Residential		Residential		Residential		Roll Off Yard Waste	Roll Off Recycling	Roll Off Garbage	Grand Total
	Garbage	Recycling	Yard Waste	Recycling	Yard Waste	Recycling	Yard Waste	Recycling	Yard Waste					
OCY 35 GAL CART FOOD PLUS RCY			20											20
OD1 1-64 GAL FOOD WASTE CART 1X WK			51											51
OD2 2-64 GAL FOOD WASTE CART 1X WK			15											15
OD3 3-64 GAL FOOD WASTE CART 1X WK			2											2
OD4 4-64 GAL FOOD WASTE CART 1X WK			3											3
OD8 8-64 GAL FOOD WASTE CART 1X WK			1											1
OE1 1 YD FEL ORGANICS			18											18
OE2 2 YD FEL ORGANICS			14											14
OE3 3 YD FEL ORGANICS			9											9
OE4 4 YD FEL ORGANICS			5											5
OE5 1.5 YD FEL ORGANICS			7											7
OE6 1-96 GAL FOOD WASTE CART 1X WK			23											23
OE8 2-96 GAL FOOD WASTE CART 1X WK			5											5
OEY 96 GAL CART FOOD PLUS RCY			3											3
P10 10 GAL CAN MSW FLAT	42													42
P28 PREMIUM SERVICE - 20 GAL									6					6
P4E PREMIUM SERVICE - 45 GAL									30					30
P5E PREMIUM SERVICE - 35 GAL									41					41
P6E PREMIUM SERVICE - 64 GAL									48					48
P9E PREMIUM SERVICE - 96 GAL									38					38
S00 SENIOR 10 GAL CART MSW									1					1
S20 20 YD SELF-CONTAINED COMPACTOR												1		1
S2E SENIOR 20 GAL CART MSW EOW									143					143
S2F SENIOR 20 GAL CART MSW									113					113
S30 30 YD SELF-CONTAINED COMPACTOR												1		1
S3F SENIOR 32 GAL CAN FLAT									64					64
S40 40 YD SELF-CONTAINED COMPACTOR												1		1
S4E SENIOR 45 GAL CART MSW EOW									17					17
S5E SENIOR 35 GAL CART MSW EOW									194					194
S5F SENIOR 35 GAL CART FLAT									145					145
S5W SENIOR 35 GAL CART MSW 1X MO									23					23
S6E SENIOR 64 GAL CART MSW EOW									32					32
S6F SENIOR 64 GAL CART FLAT									47					47
S8E SENIOR 96 GAL CART MSW EOW									10					10
S8F SENIOR 96 GAL CART FLAT									4					4
S9E SENIOR 96 GAL CART YOW														
S9F SENIOR 96 GAL CART RCY									58					58
SFY STEPS RCY FLAT										2				2
SIMC SENIOR MINI CAN		1												1
SIMM SENIOR CAN 1X MO									40					40
SQF SQUARE FOOTAGE									2					2
SQF SQUARE FOOTAGE CHARGE												180		180
SRG SURCHARGE YD/W ONLY			63										229	229

**City Contract Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 2**

Scheduled Service	Commercial Garbage	Commercial Recycling	Commercial Yard Waste	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste	Grand Total
SRV SURCHARGE RECYCLE ONLY					121					121
SS2 SENIOR SPEC 20 GA CART MSW EOW				11						11
SUN SUNKEN CAN	1									1
T2E 20 GAL CART MSW EOW				2						2
T2M 20 GAL CART MSW 1X MO				1,875						1,875
T4E 45 GAL CART MSW EOW				41						41
T51 1-35 GAL CART MSW				1,133						1,133
T52 2-35 GAL COURTS MSW				53,913						53,913
T53 3-35 GAL COURTS MSW				328						328
T54 4-35 GAL COURTS MSW				8						8
T5E 35 GAL CART MSW EOW				3						3
T5M 35 GAL CART MSW 1X MO				9,476						9,476
T61 1-64 GAL CART MSW				1,792						1,792
T62 2-64 GAL COURTS MSW				26,697						26,697
T63 3-64 GAL COURTS MSW				90						90
T64 4-64 GAL COURTS MSW				6						6
T6C 1-64 GAL CART & 1-32 GAL CAN				1						1
T6E 64 GAL CART MSW EOW				18						18
T91 1-96 GAL CART MSW				3,429						3,429
T92 2-96 GAL COURTS MSW				4,745						4,745
T93 3-96 GAL COURTS MSW				140						140
T94 4-96 GAL COURTS MSW				3						3
T9E 96 GAL CART MSW EOW				1						1
T9M 96 GAL CART MSW 1X MO				725						725
THM TIME HAUL MSW							26			26
THY TIME HAUL RECYCLE								22		22
TMP TIME FEE PER UNIT	4									4
U11 1 YD OCC 3X WK		58								58
U12 1 YD OCC 2X WK		1								1
U21 2 YD OCC 3X WK		85								85
U22 2 YD OCC 2X WK		8								8
U31 3 YD OCC 3X WK		82								82
U32 3 YD OCC 2X WK		18								18
U33 3 YD OCC 3X WK		4								4
U41 4 YD OCC 3X WK		132								132
U42 4 YD OCC 2X WK		40								40
U43 4 YD OCC 3X WK		12								12
U44 4 YD OCC 4X WK		4								4
U45 4 YD OCC 5X WK		1								1
U51 1.5 YD OCC 3X WK		8								8
U62 6 YD OCC 3X WK		83								83
U62 6 YD OCC 2X WK		25								25
U63 6 YD OCC 3X WK		6								6

**City Contract Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 2**

Scheduled Service	Commercial Garbage	Commercial Recycling	Commercial Yard Waste	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste	Grand Total
U64 6 YD OCC 4X WK		1								1
U81 8 YD OCC 1X WK		56								56
U82 8 YD OCC 2X WK		44								44
U83 8 YD OCC 3X WK		5								5
U84 8 YD OCC 4X WK		2								2
U85 8 YD OCC 5X WK		4								4
VCL 5 YD COMPACTOR 1X WK	3									3
VCL 5 YD COMPACTOR 2X WK	3									3
VCE 5 YD COMPACTOR EOW	2									2
VFM 5 YD MSW 1X MO										1
WXL 1 YD FOOD WASTE WILL CALL			3							3
Y10 10 YD RECYCLE COMPACTOR								1		1
Y20 20 YD RECYCLE COMPACTOR								4		4
Y25 25 YD RECYCLE COMPACTOR								2		2
Y30 30 YD RECYCLE COMPACTOR								23		23
Y40 40 YD RECYCLE COMPACTOR								31		31
Y51 1-35 GAL CART RCY					379					379
Y55 35 GAL CART RCY EOW					699					699
Y61 1-64 GAL CART RCY					50,184					50,184
Y62 2-64 GAL CARTS RCY					60					60
Y63 3-64 GAL CARTS RCY					1					1
Y64 4-64 GAL CARTS RCY					1					1
Y65 64 GAL CART RCY EOW					28,359					28,359
Y60 64 GAL CART RCY ON CALL					1					1
Y91 1-96 GAL CART RCY					1,111					1,111
Y95 96 GAL CART RCY EOW					57,718					57,718
Y9E RECYCLING FEE		1								1
YMF RCY MULTIFAMILY FLAT		116								116
<b>Grand Total</b>	<b>14,103</b>	<b>13,005</b>	<b>1,300</b>	<b>129,209</b>	<b>138,637</b>	<b>3,072,230</b>	<b>1,402</b>	<b>797</b>	<b>12</b>	<b>4,055,604</b>

**UTC Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 1**

Scheduled Service	Commercial Garbage	Commercial Recycling*	Commercial Yard Waste*	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling*	Roll Off Yard Waste*	Grand Total
04L 4 YD LUGGER							1			1
08L 8 YD LUGGER							1			1
06E 10-96 GAL CRT SINGLE STREAM RCY		.17								17
07L 10 YD LUGGER TEMPORARY							1	17		17
07Y 10 YD RECYCLE TEMPORARY								1		1
07L 10 YD LUGGER RECYCLE							3			3
10C 10 YD COMPACTOR								6		6
10F 10 YD FLAT ROLLOFF RECYCLE							5			5
10T 10 YD ROLLOFF TEMPORARY							2			2
10V 10 YD ROLLOFF RECYCLE							11			11
111 1-1 YD 1X PER WEEK	934									934
112 1-1 YD 2X PER WEEK	3									3
121 1-2 YD 1X PER WEEK	577									577
122 1-2 YD 2X PER WEEK	13									13
123 1-2 YD 3X PER WEEK	1									1
124 1-2 YD 4X PER WEEK	1									1
12V 12 YD ROLLOFF RECYCLE								1		1
131 1-3 YD 1X PER WEEK	356									356
132 1-3 YD 2X PER WEEK	46									46
133 1-3 YD 3X PER WEEK	9									9
134 1-3 YD 4X PER WEEK	1									1
135 1-3 YD 5X PER WEEK	2									2
141 1-4 YD 1X PER WEEK	451									451
142 1-4 YD 2X PER WEEK	89									89
143 1-4 YD 3X PER WEEK	31									31
144 1-4 YD 4X PER WEEK	1									1
145 1-4 YD 5X PER WEEK	1									1
146 1-4 YD 6X PER WEEK	1									1
151 1-1.5 YD 1X PER WEEK	284									284
152 1-1.5 YD 2X PER WEEK	2									2
153 1-1.5 YD 3X PER WEEK	1									1
15C 15 YD COMPACTOR							16			16
15O 15 YD ROLLOFF							3			3
15T 15 YD ROLLOFF TEMPORARY							3			3
15V 15 YD ROLLOFF RECYCLE								1		1
161 1-6 YD 1X PER WEEK	328									328
162 1-6 YD 2X PER WEEK	85									85
163 1-6 YD 3X PER WEEK	19									19
164 1-6 YD 4X PER WEEK	1									1
181 1-8 YD 1X PER WEEK	286									286
182 1-8 YD 2X PER WEEK	124									124
183 1-8 YD 3X PER WEEK	35									35

UTC Area Customer Count by Category and Service King and Snohomish Counties Exhibit 1										
Scheduled Service	Commercial Garbage	Commercial Recycling	Commercial Yard Waste	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste	Grand Total
184 1-8 YD 4X PER WEEK	2									2
185 1-8 YD 5X PER WEEK	6									6
186 1-8 YD 6X PER WEEK	1									1
1AM 1-32 GAL CAN MSW	61									61
1CS 15 YD CLOSED RECEIVER BOX RCY								1		1
1OM 1-64 GAL CART MSW	231									231
1EM 1-96 GAL CART MSW	234									234
1FE 1 YD MSW EDW	71									71
1PM 1 YD MSW 1X MO	3									3
1FQ 1 YD FEL ON CALL	1									1
1FX 1 YD MSW EXTRA SVC	4									4
1MY 1 YD MULTIFAMILY RCY		46								46
1OE 1 YD OCC EDW		9								9
1OM 1 YD OCC 1X MO		2								2
1PP 1 YD PAPER PER UNIT		1								1
1PT 1 YD MSW TEMP PER UNIT	1									1
1Q1 1-4 25 YD 1X PER WEEK	6									6
1S1 1-1 YD SINGLE STREAM RCY		118								118
1S2 1-2 YD SINGLE STREAM RCY		134								134
1S3 1-3 YD SINGLE STREAM RCY		99								99
1S4 1-4 YD SINGLE STREAM RCY		181								181
1S5 1-5 YD SINGLE STREAM RCY		17								17
1S6 1-6 YD SINGLE STREAM RCY		68								68
1S8 1-8 YD SINGLE STREAM RCY		62								62
1S8 1-96 GAL CART SINGLE STREAM RCY		416								416
1S9 1-96 GAL CRT SNGL STRM RCY EDW		11								11
1T0 1 YD TAG EDW		1								1
1X0 1 YD OCC EXTRA SVC		1								1
1Y1 1 YD RCY 1X WK		48								48
1Y2 1 YD RCY 2X WK		1								1
1Y3 1 YD RCY 3X WK		1								1
1Y6 1 YD RCY EDW		17								17
1YM 1 YD RCY 1X MO		19								19
20B 20 YD ORGANICS COMPACTOR									1	1
20C 20 YD COMPACTOR							36			36
20F 20 YD FLAT ROLLOFF RECYCLE								15		15
20G 20 YD GREEN/YARD WASTE									1	1
20M 20 GAL MSW 1X MO					33					33
20N 20 YD ROLLOFF CD-MINGLED									5	5
20N 1-30 GAL CAN	2									2
20C 20 YD ROLLOFF							34			34
20T 20 YD ROLLOFF TEMPORARY							36			36

UTC Area Customer Count by Category and Service King and Snohomish Counties Exhibit 1										
Scheduled Service	Commercial Garbage	Commercial Recycling*	Commercial Yard Waste*	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling*	Roll Off Yard Waste*	Grand Total
20W 20 YD ROLLOFF RECYCLE								51		51
211 2-1 YD 1X PER WEEK	3									3
221 2-2 YD 1X PER WEEK	18									18
232 2-2 YD 2X PER WEEK	1									1
231 2-3 YD 1X PER WEEK	15									15
232 2-3 YD 2X PER WEEK	12									12
233 2-3 YD 3X PER WEEK	2									2
243 2-4 YD 1X PER WEEK	28									28
242 2-4 YD 2X PER WEEK	19									19
243 2-4 YD 3X PER WEEK	4									4
251 2-1.5 YD 1X PER WEEK	3						20			23
25C 25 YD COMPACTOR							16			16
25O 25 YD ROLLOFF							3			3
25T 25 YD ROLLOFF TEMPORARY								10		10
25V 25 YD ROLLOFF RECYCLE										
261 2-6 YD 1X PER WEEK	22									22
262 2-6 YD 2X PER WEEK	15									15
263 2-6 YD 3X PER WEEK	1									1
281 2-8 YD 1X PER WEEK	29									29
282 2-8 YD 2X PER WEEK	13									13
283 2-8 YD 3X PER WEEK	7									7
285 2-8 YD 5X PER WEEK	1									1
2004 2-32 GAL CANS MSW	87									87
2C1 2 YD COMPACTOR 1X WK	7									7
2DM 2-64 GAL CARTS MSW	56									56
2EM 2-86 GAL CARTS MSW	39									39
2FE 2 YD MSW EOW	37									37
2FG 2 YD FEL GRN/YDW			1							1
2FM 2 YD MSW 1X MO	2									2
2MY 2 YD MULTIFAMILY RCY		70								70
2OE 2 YD OCC EOW		26								26
2PP 2 YD PAPER PER UNIT		1								1
2PT 2 YD MSW TEMP PER UNIT	8									8
2SE 2-86 GAL CART SINGLE STREAM RCY		61								61
2TG 2 YD TAG		1								1
2TY 2D YD RECYCLE TEMPORARY								41		41
2Y1 2 YD RCY 1X WK		69								69
2Y2 2 YD RCY 2X WK		8								8
2YE 2 YD RCY EOW		53								53
2YM 2 YD RCY 1X MO		3								3
30C 30 YD COMPACTOR							97			97
30F 30 YD FLAT ROLLOFF RECYCLE								32		32

**UTC Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 1**

Scheduled Service	Commercial Garbage	Commercial Recycling*	Commercial Yard Waste*	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling*	Roll Off Yard Waste*	Grand Total
30G 30 YD GREEN YARD WASTE									2	2
30M 30 YD ROLLOFF CO-MINGLED								4		4
30Y 30 YD ROLLOFF							98			98
30T 30 YD ROLLOFF TEMPORARY							35			35
30Y 30 YD ROLLOFF RECYCLE								58		58
321 3-2 YD 1X PER WEEK	4									4
331 3-3 YD 1X PER WEEK	2									2
332 3-3 YD 2X PER WEEK	1									1
341 3-4 YD 1X PER WEEK	7									7
342 3-4 YD 2X PER WEEK	5									5
343 3-4 YD 3X PER WEEK	2									2
351 3-1.5 YD 1X PER WEEK	1									1
352 3-1.5 YD 2X PER WEEK	2									2
35C 35 YD COMPACTOR							1			1
361 3-6 YD 1X PER WEEK	10									10
362 3-6 YD 2X PER WEEK	6									6
381 3-8 YD 1X PER WEEK	5									5
382 3-8 YD 2X PER WEEK	10									10
3AM 3-32 GAL CANS MSW	16									16
3C3 3 YD COMPACTOR 1X WK	6									6
3C2 3 YD COMPACTOR 2X WK	1									1
3DM 3-64 GAL CARTS MSW	6									6
3EM 3-95 GAL CARTS MSW	10									10
3FE 3 YD MSW EDW	20									20
3MY 3 YD MULTIFAMILY RCY		59								59
3CE 3 YD OCC EDW		7								7
3FT 3 YD MSW TEMP PER UNIT	30									30
3RF 3 YD COMPACTOR RCY		1								1
3SE 3-95 GAL CART SINGLE STREAM RCY		28								28
3TY 30 YD RECYCLE TEMPORARY								46		46
3Y1 3 YD RCY 1X WK		46								46
3Y2 3 YD RCY 2X WK		8								8
3Y3 3 YD RCY 3X WK		3								3
3YE 3 YD RCY EDW		35								35
3Y1 3 YD LUGGER RECYCLE								1		1
3YM 3 YD RCY 1X MO		6								6
40C 40 YD COMPACTOR							34			34
40F 40 YD FLAT ROLLOFF RECYCLE								50		50
40M 40 YD ROLLOFF CO-MINGLED								1		1
40X 40 YD ROLLOFF							12			12
40T 40 YD ROLLOFF TEMPORARY							14			14
40Y 40 YD ROLLOFF RECYCLE								67		67





**UTC Area Customer Count by Category and Service  
King and Snohomish Counties  
Exhibit 1**

Scheduled Service	Commercial Garbage	Commercial Recycling*	Commercial Yard Waste *	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling*	Roll Off Yard Waste *	Grand Total
5B2 5-8 YD 2X PER WEEK	2									2
5B3 5-8 YD 3X PER WEEK	1									1
5AM 5-32 GAL CANS MSW	3									3
5DM 5-64 GAL CARTS MSW	2									2
5EM 5-96 GAL CARTS MSW	1									1
5FE 1.5 YD MSW EOW	19									19
5MY 1.5 YD MULTIFAMILY RCY		30								30
5OE 1.5 YD OCC EOW		4								4
5SE 5-96 GAL CART SINGLE STREAM RCY		:0								10
5TY 25 YD RECYCLE TEMPORARY								1		1
5Y1 1.5 YD RCY 1X WK		6								6
5Y2 1.5 YD RCY EOW		9								9
5Y3 1.5 YD RCY 1X MO		3								3
5Y4 1.5 YD RCY 1X MO	1									1
621 6-2 YD 1X PER WEEK	1									1
622 6-2 YD 2X PER WEEK	1									1
632 6-3 YD 2X PER WEEK	1									1
641 6-4 YD 1X PER WEEK	1									1
642 6-4 YD 2X PER WEEK	2									2
661 6-6 YD 1X PER WEEK	1									1
6AM 6-32 GAL CANS MSW	3									3
6C1 6 YD COMPACTOR 1X WK	2									2
6C2 6 YD COMPACTOR 2X WK	1									1
6C3 6 YD COMPACTOR 3X WK	1									1
6DM 6-64 GAL CARTS MSW	1									1
6EM 6-96 GAL CARTS MSW	2									2
6FE 6 YD MSW EOW	14									14
6FM 6 YD MSW 1X MO	2									2
6MY 6 YD MULTIFAMILY RCY		18								18
6NP 6 YD NEWS PER UNIT		1								1
6OE 6 YD OCC EOW		11								11
6PT 6 YD MSW TEMP PER UNIT	39									39
6R2 6 YD COMPACTOR RCY 2X WK		1								1
6SE 6-96 GAL CART SINGLE STREAM RCY		5								5
6Y1 6 YD RCY 1X WK		41								41
6Y2 6 YD RCY 2X WK		12								12
6YE 6 YD RCY EOW		17								17
6YM 6 YD RCY 1X MO		10								10
6YD 6 YD FEL REC ON CALL		1								1
742 7-4 YD 2X PER WEEK	1									1
762 7-8 YD 2X PER WEEK	2									2
7AM 7-32 GAL CANS MSW	5									5
7EM 7-96 GAL CARTS MSW	2									2

**UTC Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 1**

Scheduled Service	Commercial Garbage	Commercial Recycling*	Commercial Yard Waste*	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll OFF Garbage	Roll OFF Recycling*	Roll OFF Yard Waste*	Grand Total
7SE 7-96 GAL CART SINGLE STREAM RCY			1							1
821 8-2 YD 1X PER WEEK										1
881 8-8 YD 1X PER WEEK										1
882 8-8 YD 2X PER WEEK										1
8DM 8-64 GAL CARTS MSW										1
8FE 8 YD MSW EOW			6							6
8FM 8 YD MSW 1X MO			1							1
8MY 8 YD MULTIFAMILY RCY			25							25
8OE 8 YD OCC EOW			6							6
8PT 8 YD MSW TEMP PER UNIT			13							13
8SE 8-96 GAL CART SINGLE STREAM RCY			6							6
8Y1 8 YD RCY 1X WK			18							18
8Y2 8 YD RCY 2X WK			18							18
8Y3 8 YD RCY 3X WK			3							3
8YE 8 YD RCY EOW			8							8
8YM 8 YD RCY 1X MO			6							6
8YQ 8 YD FEL REC ON CALL			1							1
8SE 9-96 GAL CART SINGLE STREAM RCY			3							3
AAC 11-32 GAL CANS MSW	1									1
AEO 15-32 GAL CANS MSW	1									1
AFD 16-32 GAL CANS MSW	1									1
AHC 18-32 GAL CANS MSW	1									1
AIC 19-32 GAL CANS MSW	2									2
AMY 32 GAL CAN MULTIFAMILY RCY			13							13
8EO 25-32 GAL CANS MSW	1									1
8MY BIN MULTIFAMILY FLAT			61							61
8NC BIN RECYCLE FLAT			47							47
C11 1-10 GAL MINI CAN MSW				70						70
C21 1-20 GAL MINI CAN MSW				6,571						6,571
C22 2-20 GAL MINI CAN MSW				6						6
C2M 2-20 GAL MINI CAN 1XMO										1
C2T 20 GAL CART MSW				8,658						8,658
C30 30 YD CLOSED RECEIVER BOX							1			1
C31 1-32 GAL CAN MSW				31,777						31,777
C32 2-32 GAL CANS MSW				2,411						2,411
C33 3-32 GAL CANS MSW				131						131
C34 4-32 GAL CANS MSW				24						24
C36 5-32 GAL CANS MSW				1						1
C3M 32 GAL CAN MSW 1X MO				1,593						1,593
C40 31-32 GAL CANS MSW	1									1
CET 15-35 GAL CARTS MSW	2									2
CPO 36-32 GAL CANS MSW	2									2

**UTC Area Customer Count by Category and Service  
King and Snohomish Counties  
Exhibit 1**

Scheduled Service	Commercial Garbage	Commercial Recycling*	Commercial Yard Waste *	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling*	Roll Off Yard Waste *	Grand Total
CT1 15-35 GAL CARTS MSW	1									1
CM1 35 GAL CART MSW 1X WK	23									23
CM2 35 GAL CART MSW EDW	1									1
CMY 35 GAL CART MULTIFAMILY RCY		3								3
CT2 10-35 GAL CARTS MSW	1									1
CT2 2-35 GAL CARTS MSW	2									2
CT3 3-35 GAL CARTS MSW	2									2
CT4 4-35 GAL CARTS MSW	1									1
CT1 35 GAL CART RCY 1X WK		1								1
CD0 30-32 GAL CANS MSW	1									1
DE0 45-52 GAL CANS MSW	7									7
DMN 64 GAL CART MULTIFAMILY NEWS		31								31
DMO 64 GAL CART MSW ON CALL	1									1
DMP 64 GAL CART MULTIFAMILY PAPER		33								33
DMT 64 GAL CART MULTIFAMILY TAG		31								31
DMY 64 GAL CART MULTIFAMILY RCY		63								63
DNF 64 GAL CART NEWS		3								3
DPF 64 GAL CART PAPER		54								54
DT4 64 GAL CART TAG		11								11
DY1 64 GAL CART RCY 1X WK		48								48
DYE 64 GAL CART RCY EDW		3								3
DYO 64 GAL CART RCY ON CALL		1								1
EAO 31-52 GAL CANS MSW	1									1
EGF 95 GAL CART YDW			89							89
EME 95 GAL CART MSW EDW	14									14
EMM 95 GAL CART MSW 1X MD	2									2
EMN 95 GAL CART MULTIFAMILY NEWS		2								2
EMP 95 GAL CART MULTIFAMILY PAPER		9								9
EMT 95 GAL CART MULTIFAMILY TAG		5								5
EMY 95 GAL CART MULTIFAMILY RCY		230								230
ENF 96 GAL CART NEWS		19								19
ENP 96 GAL CART OCC		4								4
EPF 96 GAL CART PAPER		30								30
ETE 96 GAL CART TAG EDW		3								3
ETF 96 GAL CART TAG		31								31
EY1 96 GAL CART RCY 1X WK		18								18
EY2 96 GAL CART RCY EDW		34								34
EY3 96 GAL CART RCY 1X MD		2								2
EYD 96 GAL CART RCY ON CALL		6								6
EYT 96 GAL TEMP RECYCLE		1								1
EZO 50-52 GAL CANS MSW	11									11
F50 50 YD FLAT ROLLOFF							4			4

**UTC Area Customer Count by Category and Service  
King and Snohomish Counties  
Exhibit 1**

Scheduled Service	Commercial Garbage	Commercial Recycling*	Commercial Yard Waste *	Residential Garbage	Residential Bicycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling	Roll Off Yard Waste *	Grand Total
G81 1-32 GAL CAN YDW						41				41
G83 32 GAL CAN YDW ON CALL						19				19
G81 1-35 GAL CART YDW						2,212				2,212
G61 1-64 GAL CART YDW						2,915				2,915
G82 2-64 GAL CARTS YDW						12				12
G60 64 GAL CART YDW ON CALL						6				6
G91 1-96 GAL CART YDW						54,767				54,767
G92 2-96 GAL CARTS YDW						1,308				1,308
G83 3-96 GAL CARTS YDW						98				98
G84 4-96 GAL CARTS YDW						22				22
G85 5-96 GAL CARTS YDW						1				1
G88 8-96 GAL CARTS YDW						1				1
G90 96 GAL CART YDW ON CALL						48				48
O67 35 GAL CART FOOD ORGANICS						27				27
O62 2-64 GAL FOOD WASTE CART 2X WK			1							1
O60 64 GAL ORGANICS ON CALL			1							1
O9C 96 GAL TOTE ORGANICS			3							3
O90 96 GAL ORGANICS ON CALL			4							4
O63 3 YD FEL ORGANICS			2							2
O6A 1-96 GAL FOOD WASTE CART 1X WK			1							1
O6C 3-96 GAL FOOD WASTE CART 1X WK			1							1
S91 1 - 96 GAL CART RCY			1		1					1
S9F SQUARE FOOTAGE								1		1
S9S SURCHARGE YDW ONLY						704				704
S9Y SURCHARGE RECYCLE ONLY					771					771
SUN SUNKEN CAN	3									3
SUN SUNKEN CAN				4						4
T51 1-35 GAL CART MSW				42,085						42,085
T52 2-35 GAL CARTS MSW				74						74
T5M 35 GAL CART MSW 1X MO				688						688
T60 1-64 GAL CART MSW				29,627						29,627
T62 2-64 GAL CARTS MSW				155						155
T63 3-64 GAL CARTS MSW				6						6
T64 4-64 GAL CARTS MSW				2						2
T6C 1-64 GAL CART & 1-92 GAL CAN				49						49
T91 1-96 GAL CART MSW				5,444						5,444
T92 2-96 GAL CARTS MSW				116						116
T93 3-96 GAL CARTS MSW				9						9
T9M TIME HAUL MSW				9						9
T9Y TIME HAUL RECYCLE							96			96
T9P TIME FEE PER UNIT	8									8
TP1 1 YD RCY TEMP PER UNIT		1								1

**UTC Area Customer Count by Category and Service**  
**King and Snohomish Counties**  
**Exhibit 1**

Scheduled Services	Commercial Garbage	Commercial Recycling*	Commercial Yard Waste*	Residential Garbage	Residential Recycling	Residential Yard Waste	Roll Off Garbage	Roll Off Recycling*	Roll Off Yard Waste*	Grand Total
TP4 4 YD RCY TEMP PER UNIT		1								1
TP8 8 YD RCY TEMP PER UNIT		1								1
U13 1 YD OCC 1X WK		39								39
U23 2 YD OCC 1X WK		77								77
U22 2 YD OCC 2X WK		3								3
U23 2 YD OCC 3X WK		2								2
U33 3 YD OCC 1X WK		56								56
U32 3 YD OCC 2X WK		11								11
U32 3 YD OCC 3X WK		106								106
U43 4 YD OCC 1X WK		32								32
U43 4 YD OCC 2X WK		1								1
U44 4 YD OCC 4X WK		1								1
U45 4 YD OCC 5X WK		2								2
U51 1.5 YD OCC 1X WK		9								9
U61 6 YD OCC 1X WK		66								66
U62 6 YD OCC 2X WK		15								15
U63 6 YD OCC 3X WK		3								3
U81 8 YD OCC 1X WK		16								16
U82 8 YD OCC 2X WK		24								24
U83 8 YD OCC 3X WK		5								5
Y20 20 YD RECYCLE COMPACTOR								2		2
Y25 25 YD RECYCLE COMPACTOR								5		5
Y30 30 YD RECYCLE COMPACTOR								26		26
Y40 40 YD RECYCLE COMPACTOR								37		37
Y51 1-35 GAL CART RCY					63					63
Y52 35 GAL CART RCY EDW					87					87
Y61 1-64 GAL CART RCY					161					161
Y62 64 GAL CART RCY EDW					385					385
Y52 55 GAL CART RCY EDW					129,815					129,815
YMF RCY MULTIFAMILY FLAT		6.4								6.4
YMP RCY MULTIFAMILY PER UNIT		1								1
	5,229	4,310	104	129,543	131,283	62,181	574	563	4	333,793

\* These services are not regulated by the UTC; however they reside within the UTC territory

**Waste Management  
UTC Labor Disruption Summary  
Exhibit 3**

	Wed - 7/25/2012				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	49	49	24,879	371	244
R - RCY	25	25	12,283	186	61
R - Y/W	23	23	12,174	322	103
C - MSW	18	16	830	169	112
C - RCY	15	15	612	43	35

	Thur - 7/26/2012				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	52	0	22,631	325	0
R - RCY	29	0	12,038	170	0
R - Y/W	23	0	9,561	241	0
C - MSW	17	0	1,001	228	0
C - RCY	14	0	458	41	0

	Fri - 7/27/2012				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	46	0	21,545	325	0
R - RCY	20	0	10,851	175	0
R - Y/W	21	0	10,464	252	0
C - MSW	14	1	655	185	8
C - RCY	11	0	382	27	0

	Sat - 7/28/2012				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
C - MSW	0	1	0	0	1
C - RCY	1	0	15	1	0

	Mon - 7/30/2012				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	47	0	23,235	336	0
R - RCY	23	0	11,821	152	0
R - Y/W	20	0	9,047	227	0
C - MSW	16	16	650	231	134
C - RCY	12	0	412	39	0

**Waste Management  
UTC Labor Disruption Summary  
Exhibit 3**

	Tue - 7/31/2012				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	49	0	25,262	383	0
R - RCY	21	0	12,625	164	0
R - Y/W	22	0	11,815	287	0
C - MSW	16	17	792	222	198
C - RCY	12	0	299	29	0

	Wed - 8/1/2012				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	49	3	24,878	359	6
R - RCY	23	0	12,319	169	0
R - Y/W	23	0	12,174	322	0
C - MSW	17	16	830	169	138
C - RCY	15	0	612	39	0

	Thu - 8/2/2012				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	52	52	22,630	325	551
R - RCY	24	2	9,902	146	9
R - Y/W	23	1	9,561	241	16
C - MSW	17	18	1,003	228	341
C - RCY	14	4	458	37	4

	Fri - 8/3/2012				
	# Rts Sched	Actual Rts	Sched Accts	Avg Tonnage	Actual Tonnage
R - MSW	46	48	21,545	325	567
R - RCY	22	24	11,067	165	169
R - Y/W	21	24	10,444	252	389
C - MSW	14	19	620	193	318
C - RCY	11	13	382	26	46

	Sat - 8/4/2012 (route counts represent Wednesday 8/1 service)				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	27	43	22,027	320	346
R - RCY	12	21	11,405	152	137
R - Y/W	12	15	7,809	206	208
C - MSW	9	12	762	154	137
C - RCY	6	14	484	42	56

**Waste Management  
UTC Labor Disruption Summary  
Exhibit 3**

	Mon - 8/6/2012				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	47	47	23,235	336	595
R - RCY	23	23	11,945	163	155
R - Y/W	20	20	9,047	227	302
C - MSW	16	16	650	231	229
C - RCY	12	12	412	39	44

	Tue - 8/7/2012				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	49	49	25,262	383	615
R - RCY	27	27	13,008	182	181
R - Y/W	22	22	11,815	287	374
C - MSW	16	16	792	222	213
C - RCY	12	12	299	29	40

	Wed - 8/8/2012				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	49	49	24,878	358	364
R - RCY	24	24	11,634	179	230
R - Y/W	23	23	12,174	322	284
C - MSW	17	17	830	169	157
C - RCY	15	15	612	44	54

	Thu - 8/9/2012				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	52	52	22,630	325	350
R - RCY	29	29	12,038	170	247
R - Y/W	23	23	9,561	241	376
C - MSW	17	17	1,002	228	240
C - RCY	14	14	458	35	53

	Fri - 8/10/2012				
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	46	46	21,545	325	323
R - RCY	20	20	10,851	175	271
R - Y/W	21	21	10,464	252	175
C - MSW	14	14	655	186	191
C - RCY	11	11	382	24	30



**Waste Management  
UTC Labor Disruption Summary  
Exhibit 3**

Sat - 8/11/2012					
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW					
R - RCY					
R - Y/W					
C - MSW					
C - RCY	1	1	15	1	1

Mon - 8/13/2012					
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	47	47	23,235	336	333
R - RCY	23	23	11,837	152	256
R - Y/W	20	20	9,047	227	161
C - MSW	16	16	650	231	230
C - RCY	12	12	412	39	33

Tue - 8/14/2012					
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	49	49	25,262	383	358
R - RCY	21	21	12,625	164	243
R - Y/W	22	22	11,815	287	185
C - MSW	16	16	792	222	215
C - RCY	12	12	299	28	29

Wed - 8/15/2012					
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	49	49	24,878	358	355
R - RCY	23	23	12,318	169	190
R - Y/W	23	23	12,174	322	217
C - MSW	17	17	830	169	171
C - RCY	15	15	612	43	43

Thu - 8/16/2012					
	# Rts Sched	Actual Rts	Sched Accts	Average Tonnage <sup>AA</sup>	Actual Tonnage
R - MSW	52	52	22,630	325	313
R - RCY	24	24	9,902	146	229
R - Y/W	23	23	9,561	241	154
C - MSW	17	17	1,002	228	222
C - RCY	14	14	458	37	40

**Waste Management  
UTC Labor Disruption Summary  
Exhibit 3**

Fri - 8/17/2012					
	<i># Rts Sched</i>	<i>Actual Rts</i>	<i>Sched Accts</i>	<i>Average Tonnage<sup>^^</sup></i>	<i>Actual Tonnage</i>
R - MSW	46	46	21,545	325	300
R - RCY	22	22	11,067	165	169
R - Y/W	21	21	10,464	252	157
C - MSW	14	14	1,039	186	189
C - RCY	11	11	382	25	23

Sat - 8/18/2012					
	<i># Rts Sched</i>	<i>Actual Rts</i>	<i>Sched Accts</i>	<i>Average Tonnage<sup>^^</sup></i>	<i>Actual Tonnage</i>
R - MSW					
R - RCY					
R - Y/W					
C - MSW					
C - RCY	1	1	15	1	1

\* Account Coverage: The estimated number of accounts serviced based on actual tonnage collected

<sup>^^</sup>Average Tonnage: Actual average daily tonnage on each route based on the 3 weeks preceding the week of 7/23/12

Drivers sent out for collection per category-UTC (King and Snohomish County) and Contract Cities												
Date	Day	Question 5					Question 6		Question 7			
		Residential Garbage	Commercial Garbage	Drop Box (R/O)	Biomedical	Residential Recycling	Commercial Recycling*	Residential Yard Waste				
15-Jul	Sun	N/A	2	2	N/A	N/A	1	N/A	1	N/A		
16-Jul	Mon	105	43	40	1	71	29	69	69	68		
17-Jul	Tue	110	44	44	1	69	31	68	68	68		
18-Jul	Wed	110	43	45	1	71	29	70	70	70		
19-Jul	Thu	111	44	41	1	71	30	69	69	69		
20-Jul	Fri	96	42	44	1	60	28	58	58	58		
21-Jul	Sat	N/A	3	9	N/A	N/A	1	N/A	1	N/A		
22-Jul	Sun	N/A	2	1	N/A	N/A	1	N/A	1	N/A		
23-Jul	Mon	109	43	42	1	72	29	67	67	67		
24-Jul	Tue	109	44	42	1	71	31	67	67	67		
25-Jul	Wed	110	41	38	1	74	29	70	70	70		
26-Jul	Thu	1	4	5	1	1	0	1	1	1		
27-Jul	Fri	3	8	10	1	0	0	0	0	0		
28-Jul	Sat	3	14	19	N/A	N/A	0	N/A	0	N/A		
29-Jul	Sun	N/A	0	7	N/A	N/A	0	N/A	0	N/A		
30-Jul	Mon	5	42	29	1	2	2	1	1	1		
31-Jul	Tue	15	41	28	1	2	1	1	1	1		
1-Aug	Wed	60	53	48	1	3	3	2	2	2		
2-Aug	Thu	112	47	42	1	20	12	37	37	37		
3-Aug	Fri	104	44	42	1	67	28	71	71	71		
4-Aug	Sat	76	28	30	N/A	62	18	50	50	50		
5-Aug	Sun	N/A	2	1	N/A	N/A	1	N/A	1	N/A		
6-Aug	Mon	107	43	46	1	72	29	66	66	66		
7-Aug	Tue	107	44	43	1	71	32	68	68	68		
8-Aug	Wed	109	43	44	1	74	30	69	69	69		
9-Aug	Thu	109	44	42	1	74	30	67	67	67		
10-Aug	Fri	97	42	41	1	73	29	60	60	60		
11-Aug	Sat	N/A	3	3	N/A	14	1	N/A	1	N/A		
12-Aug	Sun	N/A	2	1	N/A	N/A	1	N/A	1	N/A		

\*Includes multi-family recycling using detachable containers



## Waste Management's 2012 Puget Sound Labor Disruption Contingency Plan



### Experience

With hundreds of operations across North America, Waste Management is very capable of dealing with service disruptions. To mitigate this impact, Waste Management has established national strategies and support systems to assist local operations. Sharing staffing resources, knowledge and best practices has proven to be an effective way to minimize the unfortunate impact these situations can have on our customers.

In the event of a labor disruption, Waste Management will assemble a team of qualified replacement drivers and other workers. This group of professional employees has experience working in a variety of situations, including natural disasters and other events that impact normal operations.

It may be necessary to tailor local collection services with reduced service levels while continuing to seek a resolution with the Union. As always, we will use our best efforts to respond to the unique local needs of our customers.

### Replacement Labor Force

A potential labor disruption requires a committed and experienced labor contingency that is ready to move into position quickly. Waste Management's Green Team of qualified personnel from across the country is always prepared to respond in the event of a crisis such as a natural disaster or labor disruption. These employees are willing to travel and work as long as needed to provide essential services.

### Route Sheets and Collection Tools

During a labor disruption each truck will be equipped with a GPS unit pre-programmed with customer, transfer station and recycling facility locations for each route. Additionally, traditional route maps will be generated for each route.





Temporary Collection Schedule

To accommodate the impact of a labor disruption, we will prioritize collection efforts to ensure services critical to human health and the environment are provided in an orderly and predictable manner. This prioritized collection plan is similar to the plan used during prolonged weather events, ensuring solid waste collection services are uninterrupted for hospitals, nursing homes and other "critical" facilities.

The following temporary collection schedule would begin the first day of any labor disruption:

Temporary Collection Schedule for King and Snohomish Counties	
First days of a collection interruption	<ul style="list-style-type: none"> <li>Collection services at all "critical" facilities will begin.</li> <li>Residential garbage, recycling and yard waste will not be collected as our contingency workforce ramps up.</li> <li>Automated out dial phone calls will be placed to all affected customers explaining that their materials will be collected as a double load the next week with no charge for extra material (similar to what happens during a weather event).</li> <li>Our website (<a href="http://www.wmnorthwest.com">www.wmnorthwest.com</a>) will be updated regularly.</li> <li>We will provide frequent media updates as appropriate.</li> </ul>
First Full Week of Collection Interruption	<ul style="list-style-type: none"> <li>Commercial and industrial services will be provided, though some multiple collection day service may be reduced.</li> <li>Residential and multifamily collection (garbage, recycling and yard waste) will be provided in a reduced capacity such as every other week.</li> <li>Extra material collection will be provided at no charge for any customers missed during the first week.</li> <li>Automated out dial phone calls will be placed to all affected customers explaining that their materials will be collected as a double load the next week with no charge for extra material (similar to what happens during a weather event).</li> <li>Our website (<a href="http://www.wmnorthwest.com">www.wmnorthwest.com</a>) will be updated regularly.</li> <li>We will provide media updates throughout the week as appropriate.</li> </ul>

Public Education

Customer awareness of changes to the solid waste collection schedule is an essential aspect of our planning effort. We have found customers are more accepting of the inconvenience of service interruptions if they clearly understand when collection services will occur.

It is essential to provide the same public education message to all customers in both City and Unincorporated County service areas. We have learned that it is difficult for the media to communicate variances in schedules between different communities or customer subsets.



Consequently we will use a consistent collection strategy in all our service areas in King and Snohomish Counties.

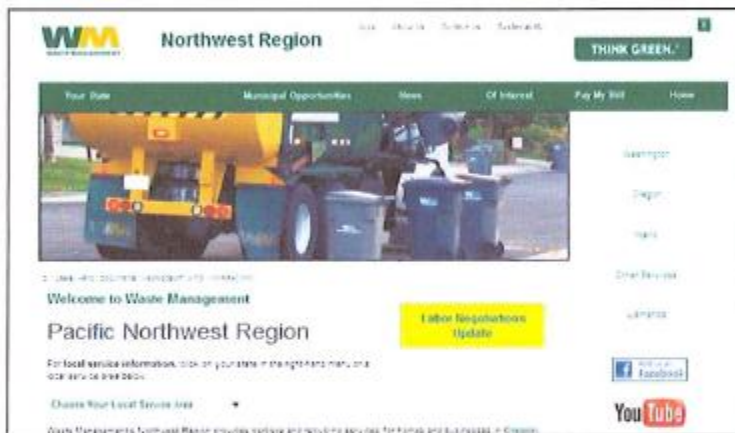
Our communication strategy will include multiple outreach methods:

**Local Press and Media**

We expect the media to cover regularly scheduled updates and press conferences. We will provide media advisories, press releases and interviews to clearly delineate variances from normal collection schedules.

**Web-based Information**

In all media advisories, press releases and interviews, we will encourage customers to visit our local website ([www.wmnorthwest.com](http://www.wmnorthwest.com)) where they will find continuously updated information on collection services for each individual community.



**Outbound Call Services**

An effective tool we utilize is targeted, automated outbound calls to individual customers throughout the day and early evening. Waste Management can send prerecorded messages, tailored to each city or service area, to thousands of customers within minutes. This allows us to blanket our service area with updated collection information quickly.

**Call Center Staffing**

A labor disruption may create a significant influx of calls to our regional Customer Service Center. To alleviate this inbound pressure, customer service representatives' work hours will be extended, including extended Saturday hours. Additionally, our state-of-the-art system allows us to activate resources from other Waste Management Customer Service Centers. Using web-enabled technology, trained customer service staff in other areas can assist local Puget Sound customers. This redundancy is part of





our emergency preparedness protocol, and can be activated in the event of labor disruptions. Callers will be encouraged to use Waste Management's local website ([www.wmnorthwest.com](http://www.wmnorthwest.com)), where collection information will be updated throughout the day.

#### City Resources

Waste Management will work with local communities to communicate through City and County websites, cable TV or other available media.

#### Security

Waste Management's Security group has developed extensive plans to ensure the safety of our employees, customers, facilities, equipment and the general public. Arrangements have been made with local security companies and local police agencies to provide staff and oversight at each of our locations.

We have met with all public agencies that provide disposal sites and transfer stations to ensure safe ingress and egress for our trucks and the safe offloading of materials.

#### Conclusion

Our commitment to you requires a diligent approach to contingency planning. We are prepared for the possibility of an interruption in our regular service. We will do all we can to minimize the impact on the local communities we serve.

Please do not hesitate to contact me with any questions.

A handwritten signature in black ink that reads 'Mary S. Evans'.

Mary S. Evans  
Waste Management  
Area Director, Public Sector Services  
Cell: 510 206 8285  
Email: [mevans4@wm.com](mailto:mevans4@wm.com)

**Waste Management**  
**King and Snohomish County Operations**  
 Analysis of Costs Incurred Due to Strike

**Exhibit 6**

	July - Aug. 2011 - Prior year period		12-Month Average BEFORE STRIKE	July - Aug. 2012 - Strike Period		2-Month Average		Cost of Strike over prior period 12-mo. Avg. %	Cost of Strike over prior year 2-mo. Avg. %	
	Jul-11	Aug-11		Jul-12	Aug-12	Jul-12	Aug-12			
<b>Disposal Costs</b>	<b>\$ 7,010,124</b>	<b>\$ 7,973,513</b>	<b>\$ 7,418,597</b>	<b>\$ 7,414,133</b>	<b>\$ 8,029,069</b>	<b>\$ 7,721,600</b>	<b>\$ 303,003</b>	<b>4.1%</b>	<b>\$ 228,791</b>	<b>3.1%</b>
Direct Labor Costs	\$ 3,817,286	\$ 3,971,365	\$ 3,667,294	\$ 3,053,575	\$ 3,644,850	\$ 3,645,212	\$ (238,061)	-6.1%	\$ (250,113)	-6.4%
Fuel	\$ 724,437	\$ 631,718	\$ 674,784	\$ 568,862	\$ 558,357	\$ 563,610	\$ (111,555)	-16.5%	\$ (114,467)	-16.9%
Other operating, maintenance and depreciation	\$ 3,640,692	\$ 4,229,311	\$ 3,930,002	\$ 3,847,008	\$ 4,333,474	\$ 4,090,241	\$ 249,728	5.6%	\$ 195,239	3.8%
<b>Total Operating Expenses</b>	<b>\$ 8,182,415</b>	<b>\$ 8,832,394</b>	<b>\$ 8,462,571</b>	<b>\$ 8,069,445</b>	<b>\$ 8,539,682</b>	<b>\$ 8,321,063</b>	<b>\$ (99,508)</b>	<b>-1.2%</b>	<b>\$ (209,241)</b>	<b>-2.5%</b>
<b>Total Disposal and operating Expenses</b>	<b>\$ 15,202,539</b>	<b>\$ 16,805,907</b>	<b>\$ 15,825,168</b>	<b>\$ 15,483,675</b>	<b>\$ 16,695,761</b>	<b>\$ 16,024,663</b>	<b>\$ 203,485</b>	<b>1.3%</b>	<b>\$ 20,440</b>	<b>0.1%</b>



## APPENDIX E



STATE OF WASHINGTON  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250  
(360) 664-1160 • TTY (360) 586-8203

May 18, 2012

Dear Solid Waste Carrier:

This letter is intended to provide technical assistance regarding work stoppages related to unanticipated labor disputes. Washington Administrative Code (WAC) 480-70-236 requires all companies to file tariffs and comply with the provisions of their approved tariffs.

It has recently come to staff's attention that companies may be relying on inclement weather or similar provisions of their tariff to address work stoppages related to unanticipated labor strikes. Following procedures that fail to address the actual issue results in tariff and rule violations.

Commission staff has recommended in the past that all solid waste carriers revise their tariffs to include a provision regarding how they will address work stoppages related to unanticipated labor strikes.

Staff considers this letter to be technical assistance regarding the need for all solid waste carriers to revise their tariffs to include procedures for addressing unanticipated work stoppages related to labor disputes. If future violations occur, staff may recommend enforcement action, including penalties.

Tariff questions should be directed to Gene Eckhardt, Regulatory Services Assistant Director. Mr. Eckhardt can be reached at (360) 664-1249 or [geckhard@utc.wa.gov](mailto:geckhard@utc.wa.gov).

Sincerely,

David W. Danner  
Executive Director and Secretary

## APPENDIX F

<u>Complaint Number</u>	<u>Date Filed</u>	<u>Class</u>	<u>Missed Pickups</u>	<u>Violations Cited WAC 480-70-236</u>	<u>Date Recovered</u>
114700	8/3/12	Res	G- 7/30- 1 Y- 7/30- 1	2	G- 8/6 R-8/6 Y- 8/6
114701	8/3/12	Res	G- 8/1- 1 Y- 08/1- 1	2	G- 8/4 R-8/4 Y- 8/4
114703	8/3/12	Res	G- 7/30- 1 Y- 7/30- 1	2	G- 8/6 R-8/6 Y- 8/6
114704	8/3/12	Res	G- 7/27- 1 R- 7/27- 1	2	G- 8/3 R-8/10
114705	8/3/12	Res	G- 8/1- 1 Y- 08/1- 1	2	G- 8/4 R-8/8 Y- 8/4
114706	8/3/12	Res	G- 7/26- 1 R- 7/26- 1 Y- 07/26- 1	3	G- 8/2 R-8/16 Y- 8/9
114707	8/3/12	Res	G- 7/31- 1 R- 7/31- 1 Y- 07/31- 1	3	G- 8/7 R-8/14 Y- 8/7
114708	8/3/12	Res	G- 7/27- 1 R- 7/27- 1 Y- 7/27- 1	3	G- 8/3 R-8/10 Y- 8/3
114709	8/3/12	Res	G- 8/1- 1 Y- 08/1- 1	2	G- 8/7 R-8/7 Y- 8/7
114710	8/3/12	Res	G- 8/1- 1 R- 8/1- 1 Y- 08/1- 1	3	G- 8/4 R-8/4 Y- 8/4
114711	8/3/12	Res	G- 8/1- 1	1	G- 8/4 R-8/8
114712	8/3/12	Res	G- 7/30- 1 Y- 7/30- 1	2	G- 8/6 R-8/6 Y- 8/6

<u>Complaint Number</u>	<u>Date Filed</u>	<u>Class</u>	<u>Missed Pickups</u>	<u>Violations Cited WAC 480-70-236</u>	<u>Date Recovered</u>
114720	8/3/12	Res	G- 8/1- 1 R- 8/1-1 Y- 08/1- 1	3	G- 8/4 R-8/8 Y- 8/4
114721	8/3/12	Res	G- 7/26- 1 Y- 7/26- 1	2	G- 8/2 R-8/9 Y- 8/9
114722	8/3/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/16 Y- 8/9
114725	8/6/12	Res	G- 7/27- 1 R- 7/27- 1 Y- 7/27- 1	3	G- 8/3 R-8/10 Y- 8/3
114730	8/6/12	Com	SW- 7/31- 1	1	R- 8/7
114731	8/6/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/9 R-8/16 Y- 8/9
114742	8/6/12	Res	G- 7/27- 1 R- 7/27- 1 Y- 7/27- 1	3	G- 8/3 R-8/10 Y- 8/3
114743	8/6/12	Res	G- 8/1- 1 Y- 08/1- 1	2	G- 8/4 R-8/8 Y- 8/4
114744	8/6/12	Res	G- 7/27- 1 R- 7/27- 1 Y- 7/27- 1	3	G- 8/3 R-8/10 Y- 8/3
114745	8/6/12	Res	G- 7/26- 1 Y- 7/26 and 8/2- 2	3	G- 8/2 R-8/9 Y- 8/9
114763	8/6/12	Res	G- 8/1- 1 R- 8/1-1	2	G- 8/4 R-8/4
114752	8/6/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G-8/2 R-8/9 Y-8/2
114755	8/6/12	Res	G- 8/1- 1 Y- 08/1- 1	2	G- 8/4 R-8/8

<u>Complaint Number</u>	<u>Date Filed</u>	<u>Class</u>	<u>Missed Pickups</u>	<u>Violations Cited WAC 480-70-236</u>	<u>Date Recovered</u>
114762	8/6/12	Res	G-7/30-1	1	G-8/6
114764	8/6/12	Res	G-7/27-1 R-7/27-1 Y-7/27-1	3	G-8/3 R-8/10 Y-8/3
114767	8/6/12	Res	G-7/26-1 R-8/2-1 Y-7/26 and 8/2-2	4	G-8/2 R-8/16 Y-8/9
114769	8/6/12	Res	G-7/27-1 R-7/27-1	2	n/a
114772	8/6/12	Res	Y-7/27-1	1	G-8/3 R-8/3 Y-8/3
114783	8/6/12	Res	G-7/31-1 R-7/31-1	2	G-8/7 R-8/14
114784	8/6/12	Res	G-7/30-1	1	G-8/6 R-8/6
114786	8/7/12	Res	G-8/1-1 R-8/1-1 Y-8/1-1	3	G-8/8 R-8/15 Y-8/8
114790	8/7/12	Res	G-7/31-1 R-7/31-1 Y-7/31-1	3	G-8/7 R-8/14 Y-8/7
114801	8/7/12	Res	G-8/1-1 R-8/1-1 Y-8/1-1	3	G-8/4 R-8/4 Y-8/4
114804	8/7/12	Res	G-7/30-1 R-7/30-1 Y-7/30-1	3	G-8/6 R-8/6 Y-8/6
114806	8/7/12	Res	G-8/1-1 R-8/1-1 Y-0	2	G-8/4 R-8/4
114808	8/7/12	Res	G-7/26-1 R-7/26-1 Y-7/26 and 8/2-2	4	G-8/2 R-8/9 Y-8/9
114809	8/7/12	Res	G-7/26-1 R-8/2-1 Y-7/26 and 8/2-2	4	G-8/2 R-8/2 Y-8/2

<u>Complaint Number</u>	<u>Date Filed</u>	<u>Class</u>	<u>Missed Pickups</u>	<u>Violations Cited WAC 480-70-236</u>	<u>Date Recovered</u>
114811	8/7/12	Res	G- 8/1- 1	1	G- 8/8 R-8/8
114812	8/7/12	Res	G- 7/30- 1 Y- 7/30- 1	2	G- 8/6 R-8/6 Y- 8/6
114815	8/7/12	Res	G- 7/31- 1 R- 7/31- 1	2	G- 8/7 R-8/14
114817	8/7/12	Res	G- 8/1- 1 Y- 8/1- 1	2	G- 8/4 R-8/8 Y- 8/4
114827	8/8/12	Res	G- 7/27- 1 Y- 7/27- 1	2	G- 8/3 R-8/3 Y- 8/3
114828	8/8/12	Res	G- 7/31- 1 Y- 7/31- 1	2	G- 8/7 R-8/14 Y- 8/7
114829	8/8/12	Com	G- 7/30- 1 R-7/30- 1 Y- 7/30- 1	3	G- 8/6 R-8/13 Y- 8/6
114831	8/8/12	Res	G- 7/30- 1	1	G- 8/6 R-8/6
114832	8/8/12	Res	G- 7/30- 1	1	G- 8/6 R-8/6
114836	8/8/12	Res	G- 8/1- 1	1	G- 8/4 R- 8/8
114842	8/8/12	Res	G- 7/27- 1 Y- 7/27- 1	2	G- 8/3 R-8/10 Y- 8/3
114843	8/8/12	Res	G- 8/1- 1	1	G- 8/4 R- 8/4
114845	8/8/12	Res	G- 7/26- 1 R- 7/26- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/9 Y- 8/9
114848	8/8/12	Res	G- 8/1- 1	1	G- 8/3 R-8/10 Y- 8/3
114849	8/8/12	Res	G- 7/27- 1 R- 7/27- 1	2	G- 8/3 R-8/3

<u>Complaint Number</u>	<u>Date Filed</u>	<u>Class</u>	<u>Missed Pickups</u>	<u>Violations Cited WAC 480-70-236</u>	<u>Date Recovered</u>
114850	8/8/12	Res	G- 7/26- 1	1	G- 8/9 R-8/9
114853	8/8/12	Res	R- 8/1- 1	1	R-8/4
114856	8/8/12	Res	G- 8/1- 1 R- 8/1- 1	2	G- 8/4 R-8/4
114857	8/8/12	Res	G- 7/27- 1 R- 7/27- 1	2	G- 8/3 R-8/17
114866	8/8/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/16 Y- 8/9
114875	8/8/12	Res	G- 7/31- 1 R- 7/31- 1 Y- 7/31- 1	3	G- 8/7 R-8/14 Y- 8/7
114877	8/8/12	Res	G- 8/1- 1	1	G- 8/4 R-8/8
114879	8/8/12	Res	G- 7/27- 1 R- 7/27- 1	2	G- 8/3 R-8/10
114881	8/8/12	Res	R-7/30- 1 Y- 7/30- 1	2	G- 8/6 R-8/13 Y- 8/6
114882	8/8/12	Res	G- 7/27- 1	1	G- 8/3 R-8/3
114884	8/8/12	Res	G- 7/30- 1 R-7/30- 1 Y- 7/30- 1	3	G- 8/6 R-8/13 Y- 8/6
114885	8/8/12	Res	G- 8/1- 1 R- 8/1- 1	2	G- 8/8 R-8/4 or 8/15
114886	8/8/12	Res	G- 7/31- 1 R- 7/31- 1 Y- 7/31- 1	3	G- 8/2 R-8/16
114887	8/8/12	Res	G- 7/26- 1 R- 8/2- 1	2	G- 8/2 R-8/16
114889	8/8/12	Res	G- 7/26- 1 R- 8/2- 1	2	G- 8/6 R-8/6

<u>Complaint Number</u>	<u>Date Filed</u>	<u>Class</u>	<u>Missed Pickups</u>	<u>Violations Cited WAC 480-70-236</u>	<u>Date Recovered</u>
114907	8/9/12	Res	G- 7/30- 1 R-7/30- 1	2	G-8/6 R-8/6 Y-8/6
114913	8/9/12	Res	G- 7/30- 1 Y- 7/30- 1	2	G- 8/7 R-8/14 Y- 8/7
114914	8/9/12	Res	G- 7/30- 1 R- 7/30- 1 Y- 7/30- 1	3	G-7/30 R-8/10 Y-8/6
114916	8/9/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/16 Y- 8/9
114917	8/9/12	Res	G- 8/1- 1 R- 8/1- 1 Y- 8/1- 1	3	G- 8/4 R-8/4 Y- 8/4
114918	8/9/12	Res	G- 7/30- 1 R-7/30- 1 Y- 7/30- 1	3	
114919	8/9/12	Res	G- 7/26- 1 R- 8/2- 1	2	G- 8/2 R-8/16
114920	8/9/12	Res	G- 8/1- 1 Y- 8/1- 1	2	G- 8/4 R-8/4 Y- 8/4
114921	8/9/12	Res	G- 7/30- 1	1	G- 8/3 R-8/10
114922	8/9/12	Res	G- 7/27- 1 R- 7/27- 1	2	G- 8/6 R-8/6
114923	8/9/12	Res	G- 8/1- 1 R- 8/1- 1	2	G- 8/4 R-8/8
114924	8/9/12	Res	G- 7/30- 1 R-7/30- 1 Y- 7/30- 1	3	G- 8/6 R-8/13 Y- 8/6
114925	8/9/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/16 Y- 8/9
114929	8/9/12	Res	G- 7/31- 1 R- 7/31- 1 Y- 7/31- 1	3	G- 8/7 R-8/14 Y- 8/7

<u>Complaint Number</u>	<u>Date Filed</u>	<u>Class</u>	<u>Missed Pickups</u>	<u>Violations Cited WAC 480-70-236</u>	<u>Date Recovered</u>
114934	8/9/12	Res	G- 7/26- 1 R- 7/26- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/9 Y- 8/9
114943	8/9/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/16 Y- 8/9
114947	8/9/12	Res	G- 7/31- 1 R- 7/31- 1 Y- 7/31- 1	3	G- 8/7 R-8/14 Y- 8/7
114950	8/9/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/16 Y- 8/9
114955	8/10/12	Res	G- 7/27- 1 R- 7/27- 1 Y- 7/27- 1	3	G- 8/3 R-8/10 Y- 8/3
114956	8/10/12	Res	G- 7/26- 1 R- 8/2- 1	2	G- 8/2 R-8/16
114959	8/10/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/16 Y- 8/2
114960	8/10/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/16 Y- 8/2
114961	8/10/12	Res	G- 7/30- 1	1	G- 8/6 R-8/6 Y- 8/6
114962	8/10/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/16 Y- 8/2
114965	8/10/12	Res	G- 8/1- 1	1	G- 8/8 R-8/8 Y- 8/8
114969	8/10/12	Res	G- 7/26- 1 R- 7/26- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/9 Y- 8/9



<u>Complaint Number</u>	<u>Date Filed</u>	<u>Class</u>	<u>Missed Pickups</u>	<u>Violations Cited WAC 480-70-236</u>	<u>Date Recovered</u>
114971	8/10/12	Res	G- 7/26- 1 R- 7/26- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/9 Y- 8/9
114975	8/10/12	Res	R- 8/2- 1	1	G- 1xm R-8/3
114985	8/13/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/9 Y- 8/9
114997	8/13/12	Res	G- 7/27- 1 R- 7/27- 1 Y- 7/27- 1	3	G- 8/3 R-8/10 Y- 8/3
114998	8/13/12	Res	G- 7/26- 1 R- 7/26- 1	2	G- 8/2 R-8/9
114999	8/13/12	Res	G- 7/27- 1 R- 7/27- 1	2	G- 8/3 R-8/3
115023	8/14/12	Res	G- 8/1- 1 R- 8/1- 1	2	G- 8/8 R-8/15
115037	8/14/12	Res	G- 7/31- 1	1	G- 8/7 R-8/7
115044	8/16/12	Res	G- 7/31- 1 R- 7/31-1 Y- 7/27- 1	3	G- 8/7 R-8/14 Y- 8/3
115061	8/17/12	Res	G- 8/1- 1 Y- 8/1- 1	2	G- 8/4 R-8/8 Y- 8/4
115063	8/17/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/16 Y- 8/2
115080	8/23/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/4 Y- 8/4
115085	8/23/12	Res	G- 7/30- 1 R-7/30- 1 Y- 7/30- 1	3	G- 8/6 R-8/13 Y- 8/6

<u>Complaint Number</u>	<u>Date Filed</u>	<u>Class</u>	<u>Missed Pickups</u>	<u>Violations Cited WAC 480-70-236</u>	<u>Date Recovered</u>
115091	8/23/12	Res	G- 7/27- 1	1	G- 8/3 R-8/3
115116	8/23/12	Res	G- 7/31- 1 R- 7/31- 1 Y- 7/31- 1	3	G- 8/7 R-8/7 Y- 8/7
115022	8/14/12	Res	G- 8/1- 1 R- 8/1- 1 Y- n/a	2	G- 8/4 R-8/4
115055	8/17/12	Res	G- 7/26- 1 R- 8/2- 1	2	G- 8/2 R-8/9 Y- 8/9
115125	8/24/12	Res	G- 7/31- 1 R- 7/31- 1 Y- 7/31- 1	3	G- 8/7 R-8/7 Y- 8/7
115127	8/24/12	Res	G- 7/31- 1 R- 7/31- 1	2	G- 8/7 R-8/7
115128	8/24/12	Res	G- 7/26- 1 R- 7/26- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/16 Y- 8/2
115130	8/24/12	Res	G- 7/30- 1 R-7/30- 1 Y- 7/30- 1	3	G- 8/6 R-8/13 Y- 8/6
115142	8/28/12	Res	G- 7/26- 1 R- 7/26- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/9 Y- 8/9
115168	8/28/12	Res	G- 7/26- 1 R- 7/26- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/9 Y- 8/9
115170	8/28/12	Res	G- 7/30- 1	1	G- 8/6 R-8/6
115171	8/28/12	Res	R-7/30- 1	1	G- n/a R-8/13
115179	8/28/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/9 Y- 8/9

<u>Complaint Number</u>	<u>Date Filed</u>	<u>Class</u>	<u>Missed Pickups</u>	<u>Violations Cited WAC 480-70-236</u>	<u>Date Recovered</u>
115184	8/28/12	Res	G- 7/26- 1 R- 7/26- 1	2	G- 8/2 R-8/9 Y- 8/9
115239	9/4/12	Res	G-7/25 & 8/1 R-7/28-1 Y-7/25 and 8/1	4	G-8/8 R-8/8 Y-8/8
115294	9/12/12	Res	G- 8/1- 1 R- 8/1- 1 Y- 8/1- 1	3	G- 8/4 R-8/15 Y- 8/4
115319	9/12/12	Com	G- 8/1- 1 R- 8/1- 1	2	G- 8/4 R-8/4
115320	9/12/12	Res	G- 7/31- 1 R- 7/31- 1 Y- 7/27- 1	3	G- 8/7 R-8/14 Y- 8/3
115355	9/24/12	Res	G- 7/27- 1 R- 7/27- 1 Y- 7/27- 1	3	G- 8/3 R-8/3 Y- 8/3
115561	10/9/12	Res	G- 8/1- 1	1	G- 8/4 R-8/8
115567	10/9/12	Res	G- 7/31- 1	1	G- 8/7 R-8/7
115667	10/17/12	Res	G- 7/26- 1 R- 8/2- 1 Y- 7/26 and 8/2- 2	4	G- 8/2 R-8/9 Y- 8/9

## APPENDIX G

Washington UTC Complaint

114699

Company: Waste Management of Washington, Inc. M37365

Customer: Account#

Master complaint - Waste Management Sno-King (strike)

Contact:

, WA

Complaint: 114699

Serviced by: Suzanne Stillwell

Opened on: 08/03/2012

Grouped by: Master Complaint

Closed on: 10/31/2012

Disposition: Consumer upheld

### Description:



Complaints (136) relating to the labor strike in Snohomish, King, and Skagit counties (July 25 through August 1; contract ratified August 2). The customers solid waste, recycling and /or lawn services were missed.

### Results:

The company does not intend to provide credits for missed solid waste, recycling and yard waste collection during the labor dispute from July 25 to Aug. 2. The company did allow customers to set out extra solid waste, recycling and yard waste on the next scheduled or available collection date at no additional charge.

Customers were advised that the commission is conducting a formal investigation into the company's actions during the labor dispute and the impacts on its customers in TG-121265. Separately, the commission intends to consider whether to amend part of the industry standard tariff to address service interruptions due to labor disputes in TG-010374. The results of these proceedings will be posted on the commission's website at [www.utc.wa.gov](http://www.utc.wa.gov).

Violations noted - 331

### Activity:

#### Activity Links

\*\*\* 08/03/2012 10:43 AM Email: Stillwell, Suzanne (UTC) >> UTC DL Complaint Team



If you get calls from WM customers, log them into the public involvement database; and advise them about the upcoming public meeting on the 9th at 5pm to discuss the strike. Please get their contact information, either, mailing address or email.

I have created a master complaint #114699 for regulated customers to receive credit for their missed pickups. Please enter any new complaints and link it to the master complaint. Thanks, Suzanne

\*\*\* 08/03/2012 12:58 PM Email: Stillwell, Suzanne (UTC) >> [mweinstein@wm.com](mailto:mweinstein@wm.com)



I am forwarding complaints we received from some of your customers about the strike situation. I look forward to your response which is due not later than August 7. We expect that you will apply WAC 480-70-391 and take the appropriate action to satisfy their concerns. Thank you, Suzanne

(Forwarded all complaints opened on 8/3)

\*\*\* 08/06/2012 12:15 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



I am forwarding 3 new complaints received from some of your customers about the strike situation. I look forward to your response which is due not later than August 8. We expect that you will apply WAC 480-70-391 and take the appropriate action to satisfy their concerns. Thank you, Suzanne

11472 William A. Smith  
114743 Otto Krause  
114744 Mary Ann Eibert

\*\*\* 08/06/2012 04:05 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



I am forwarding 6 new complaints received from some of your customers about the strike situation. I look forward to your response which is due not later than August 8. We expect that you will apply WAC 480-70-391 and take the appropriate action to satisfy their concerns. Thank you, Suzanne

Forwarded the following complaints:  
Complaint 114752 Hope Gibson  
Complaint 114755 Terrence J. Connor  
Complaint 114762 Isha  
Complaint 114764 Brian Lane  
Complaint 114767 Steve Tolpingrud  
Complaint 114769 Linda Hartley  
Complaint 114772 Michael Steinore

\*\*\* 08/06/2012 04:15 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



Correction; there are 7 complaints not 6 as noted below:

Complaint 114752 Hope Gibson  
Complaint 114755 Terrence J. Connor  
Complaint 114762 Isha  
Complaint 114764 Brian Lane  
Complaint 114767 Steve Tolpingrud  
Complaint 114769 Linda Hartley  
Complaint 114772 Michael Steinore

\*\*\* 08/06/2012 05:07 PM Phone: Suzanne Stillwell << Mike Weinstein



Michael called and requested an extension until Friday. At this time there are 32 complaints and they need the time to investigate each and every one before they respond to us. I approved the request. He thinks they served many of the UTC regulated customers on Saturday.


\*\*\* 08/07/2012 10:21 AM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



I am forwarding complaints we received from two of your customers about the strike situation. I look forward to your response which is due not later than August 10\*. We expect that you will apply WAC 480-70-391 and take the appropriate action to satisfy their concerns. Thank you, Suzanne

\*Extension granted by SS 8/6.


Complaint 114786 Curt Whitaker  
Complaint 114790 James Clancy

\*\*\* 08/07/2012 04:03 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike  



Suzanne, as I mentioned to you yesterday and I am confirming with this e-mail, we are working diligently investigating each of the 34 complaints you have sent to me. As you and I agreed to, we will respond to each of these complaints and document our recovery efforts for each of these customers by the end of this week.

However, if we find that more time is necessary we will advise you as soon as we can. Please let me know if you have any questions. Thank you

Mike Weinstein  
Senior Area Pricing Manager  
Waste Management - Pacific Northwest Market Area  
(425) 814-7840 (office)  
(425) 814-7866 (fax)  
(206) 954-3831 (cell)

\*\*\* 08/07/2012 04:15 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike  



There are about 15 or so more that I will send you at the end of the day.  
Suzanne

\*\*\* 08/08/2012 08:01 AM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike  



Hi, Suzanne

Just checking, I did not receive the 15 complaints you mentioned below that you were sending me.

Mike Weinstein

\*\*\* 08/08/2012 08:32 AM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike  


Hello Mike! I was working on it and 'couldn't send them all at once for some reason. I may have to send them all one at a time. Suzanne

\*\*\* 08/08/2012 09:33 AM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com  


I am forwarding 26 new complaints received from your customers on August 7 and 8 about the strike situation. It is possible that a couple have already been passed to you by staff. I look forward to your response which is due not later than August 10. We expect that you will apply WAC 480-70-391 and take the appropriate action to satisfy their concerns. Thank you, Suzanne

Passed following complaints:  
Complaint 114801 ELIZABETH HILL  
Complaint 114803 Patricia Warren  
Complaint 114804 Dean Komata  
Complaint 114805 DAVE GEISERT  
Complaint 114806 Peter Bottman  
Complaint 114808 STEPHEN MAGLADRY

Complaint 114809 JEFF AUMAN  
Complaint 114810 ROGER BOWIE  
Complaint 114811 JEFF STANLEY  
Complaint 114812 LEEANN MAIN  
Complaint 114815 SUSHIL BOGATI  
Complaint 114816 LYNN OLIVER  
Complaint 114817 DAVE BLOMBERG  
Complaint 114818 Steve Silcock  
Complaint 114832 Casey Harrison  
Complaint 114831 Oksana Lysenko  
Complaint 114829 Marie Ramirez  
Complaint 114828 Charles Stoltz  
Complaint 114827 BRETT WILLIAMS  
Complaint 114835 Barb Lark  
Complaint 114836 AMY BURTIS  
Complaint 114837 LUIS ROSA  
Complaint 114842 RUBIN JACKSON  
Complaint 114843 LANE HOBACK  
Complaint 114845 Craig Bowen

\*\*\* 08/08/2012 12:24 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



I am forwarding 12 complaints we received from your customers about the strike situation. I look forward to your response which is due not later than August 10. We expect that you will apply WAC 480-70-391 and take the appropriate action to satisfy their concerns. Thank you, Suzanne

Forwarded the following complaints:

Complaint 114846 KYLE SCHADT  
Complaint 114848 DOUG JUNTWAIT  
Complaint 114849 LYNN STONE  
Complaint 114851 STEVE FISHER  
Complaint 114850 Spencer Broome  
Complaint 114853 KAREN ISAACSON  
Complaint 114854 J K CLANCY  
Complaint 114855 CHERYL FONTAINE  
Complaint 114856 MARK AVLON  
Complaint 114857 Jennifer L Casey  
Complaint 114866 CAROL FREDRICKSON  
Complaint 114868 Michael Ross

\*\*\* 08/08/2012 01:22 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Complaint # 114855 does not seem to be a complaint to me. Could you please consider removing it? In addition, complaints #114790 and 114854 are from the same customer. Should these be consolidated into one complaint?

The total numbers of complaints are over 70 at this point and where we will strive to have as many of the first 34 received as of yesterday by Friday afternoon, I hope that you will understand that it is very possible the complaints since added will not be fully investigated and resolved by that time. Thank you

\*\*\* 08/08/2012 01:43 PM Email: Suzanne Stillwell >> Michael Weinstein



Mike, I agree that this is not a complaint (114855) and will change it into an inquiry. Suzanne

\*\*\* 08/08/2012 02:01 PM Email: Suzanne Stillwell >> Michael Weinstein



Mike, 114854 will be deleted and added to the original 114790.

In terms of responses to these newly passed complaints, the due date is 8/10; and if you need an extension, please request it by 8/10 with a requested due date. Thanks, Suzanne

\*\*\* 08/09/2012 09:10 AM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



I am forwarding 14 new complaints received from some of your customers about the strike situation. These particular complaints have a due date of August 13. We expect that you will apply WAC 480-70-391 and take the appropriate action to satisfy their concerns. Thank you, Suzanne

Forwarded the following complaints:

Complaint 114866 CAROL FREDRICKSON  
Complaint 114875 William and April Brady  
Complaint 114877 BARBARA STOCKING  
Complaint 114878 TRACY TALLMAN  
Complaint 114879 KEVIN BUCK  
Complaint 114880 LINDA JESCHKE  
Complaint 114881 CAROL SULLIVAN  
Complaint 114882 TOM ALSTON  
Complaint 114883 LINDA VETTER  
Complaint 114884 FRANK NICHOLS  
Complaint 114885 WILLIAM R. SLATER  
Complaint 114886 WILLIAM AND APRIL BRADY  
Complaint 114887 Joe Ollom  
Complaint 114889 PETER SAMSON

\*\*\* 08/09/2012 09:16 AM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



Mike, if any of the complaints are found to be in non-UTC regulated territory, let me know and I will change them into an inquiry. Suzanne

\*\*\* 08/09/2012 12:25 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



I am forwarding 18 new complaints received from some of your customers about the strike situation. These particular complaints have a due date of August 13. We expect that you will apply WAC 480-70-391 and take the appropriate action to satisfy their concerns. Thank you, Suzanne

Forwarded the following complaints:

Complaint 114907 Fatima Benghaly  
Complaint 114913 LAWRENCE DILLARD  
Complaint 114914 LARRY CIVARRA  
Complaint 114915 CHERYL  
Complaint 114916 LYNDA AND GEORGE WESSMAN  
Complaint 114917 SHIRLEY SCHMIT  
Complaint 114918 KIRBY JOHNSON  
Complaint 114919 TERRY MARTZ



Complaint 114920 JOHN SMITH  
Complaint 114921 SUSIE BURKE  
Complaint 114922 CHERRYL MANN  
Complaint 114923 JUDY THOMPSON  
Complaint 114924 LEON KOS  
Complaint 114925 MARIJANE MARCEAU  
Complaint 114927 TOM MARTINDILL  
Complaint 114928 JOE ZOMAR  
Complaint 114929 Michael Geer  
Complaint 114934 Michelle Wenstrom

\*\*\* 08/09/2012 05:17 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



Here is another complaint from one of your customers about the strike situation. Your response is due not later than August 14. We expect that you will apply WAC 480-70-391 and take the appropriate action to satisfy their concerns. Thank you, Suzanne

Complaint 114947 JAIMEE ENGLISH

\*\*\* 08/10/2012 08:01 AM Email: Stillwell, Suzanne (UTC) >> 'Weinstein, Mike'



Suzanne, I do not believe 114916 is technically a complaint. Please review. Thanks

\*\*\* 08/10/2012 09:16 AM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike



Mike, I agree that 114916 is not a complaint about the company and I will change it into an inquiry.

\*\*\* 08/10/2012 10:54 AM Phone: Suzanne Stillwell << Michael Weinstein



Called to say that he will have a spreadsheet later that will include responses for the initial 34 complaints. He would like to discuss the credit issue further with Steve, Polly and I next week in person. I advised him that the commission expects that the credits will be provided to these customers. He is fully aware, yet wants to talk in person to address the credit issue.

\*\*\* 08/10/2012 01:00 PM Email: Stillwell, Suzanne (UTC) << King, Steve (UTC) to Polly Neill/Waste Management



Hi Polly:

Thank you for your voicemail. I'm sorry I wasn't able to call you back before your 11 a.m. meeting. I will be out of the office next week and Suzanne will respond as to when a meeting about the commission-referred complaints might take place.

Compliance investigations are generally done by staff within my area of responsibility. Rayne Pearson in our Compliance Investigations section will head up the investigation related to the service issues. Sharon Wallace supervises that section. Someone from our Motor Carrier Safety section will cover the safety rules. That assignment has not yet been made. Dave Pratt supervises that section.

Thank you again for your help with the public meeting yesterday. I thought it

went quite well given the short timeframes involved.

Steve

Steven King  
Director, Safety and Consumer Protection  
Utilities and Transportation Commission  
360-664-1115 (office), 360-359-3883 (mobile)

From: Polly McNeill [mailto:pollym@SummitLaw.com]  
Sent: Friday, August 10, 2012 11:17 AM  
To: King, Steve (UTC)  
Subject: Meeting to Discuss Complaint Resolution

Hi Steve,

Following up on my voicemail message - Waste Management is continuing to investigate the consumer complaints as they have filtered in, and I believe Mike will be communicating with Suzanne about the progress made (which, in my view, is significant) and the need for more time to complete the company's analysis. The company is contacting customers and reviewing its internal information to determine each customer's situation. Although the number is not a high percentage of overall WUTC customers serviced, it is nonetheless a greater amount than usual and it's taking some time to get the information about all of them. So we would like to request additional time, and Mike will be communicating that to Suzanne, along with the summary of our investigation so far.

In the meantime, we would like to come down to meet with you and whoever you deem appropriate (presumably Suzanne, and maybe Gene as well) to discuss how to handle these complaints while the formal investigation is ongoing. (It is not entirely clear to me who all is involved in the various moving parts, for which I apologize.) Obviously the complaints need to be resolved sooner than later, and yet the investigation will not quickly be concluded. We have some ideas that we'd like to present.

Mike and I are available Monday afternoon after about 2:00; Tuesday morning before 10:30; and Wednesday morning almost any time. Can you let me know if any of those are good?

Thanks for your consideration.

Best, Polly

----- Summit Law Group -----

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matter addressed herein.

\*\*\* 08/10/2012 01:01 PM Action: Suzanne Stillwell



Scheduled meeting Wed. 8/15 1030am.

\*\*\* 08/10/2012 02:28 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



I am forwarding 9 new complaints received from some of your customers about the strike situation. Your response is due not later than August 15. We expect that you will apply WAC 480-70-391 and take the appropriate action to satisfy their concerns. Thank you, Suzanne

Forwarded following complaints:

Complaint 114956 Shane Anderson  
Complaint 114955 Gene McDermott  
Complaint 114959 BETTY GOETZ  
Complaint 114960 DEAN MUNDAY  
Complaint 114961 Ron Hopper  
Complaint 114962 Jenny Fransson  
Complaint 114965 Anne Cochez-Lind  
Complaint 114969 Ann Dean  
Complaint 114971 Nick Vicente

\*\*\* 08/10/2012 04:00 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Suzanne, as promised attached is a log of the 111 complaints from our customers that you have forwarded to me. This log summarizes the complaint number, name, address, account number, telephone number, recovery schedule, and notes regarding the customer and our efforts to contact the customer. Due to our ongoing efforts to get all our customers' garbage, recycling, and yard waste collected, we have only had enough time to research and contact the first 34 complaints received. We will make every attempt to document the status of the remaining customers on this log within the first few days of next week.

There are few things on this log that I would like to bring to your attention:

We believe that complaint numbers 114803, 114805, 114810, 114846, 114915 and 114928 are contract city customers (highlighted in yellow). Complaint # 114769 cancelled their account with us

We could not locate in our system complaint # 114762. Possibly, the address is in error

In column I where we document our recovery schedule, the letter G denotes garbage, R denotes Recycling and Y denote yard waste

As I obtain additional information regarding these complaints, I will update the log and send back to you.

I along with Polly McNeill look forward to meet with you to discuss in more detail the resolution of these complaints.

SEE ATTACHED - updated spreadsheet of individual complaint status

\*\*\* 08/13/2012 12:52 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



I am forwarding six new complaints received from some of your customers about the strike situation. Your response is due not later than August 15. We expect that you will apply WAC 480-70-391 and take the appropriate action to satisfy their concerns. Thank you, Suzanne

Forwarded following complaints:

Complaint 114985 Rebecca Randolph  
Complaint 114996 SHARON GREGORY (withdrew 8/14)  
Complaint 114997 LARRY EHOFF  
Complaint 114998 LAUREEN DRISCOLL  
Complaint 114999 DALE JOHNSON  
Complaint 115000 ANNE COCHEZ-LIND

\*\*\* 08/13/2012 02:41 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Suzanne, no address or phone number was supplied for complaint #114996. We cannot respond to this complaint until we can verify the address. Mike

\*\*\* 08/13/2012 02:48 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



I'll check on it.

\*\*\* 08/14/2012 09:06 AM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



Mike, the customer#114996 withdrew her complaint because the cans were picked up yesterday. I changed it to an inquiry.

\*\*\* 08/14/2012 11:52 AM Voice Mail: Suzanne Stillwell >> Mike Weinstein



LM to call and discuss tomorrow's meeting about complaint resolution.

\*\*\* 08/14/2012 03:30 PM Phone: Suzanne Stillwell << Mike



Called to confirm and suggest a teleconference rather than a meeting tomorrow at 1030am.

\*\*\* 08/14/2012 04:18 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



Mike, can you please add another column to your spreadsheet which includes each customer's date of service for garbage, recycling and yard waste. Thanks, Suzanne

\*\*\* 08/14/2012 04:20 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Do you mean if they have service on each Tuesday put "Tuesday" in the column?

\*\*\* 08/14/2012 04:47 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Suzanne, I will send you an update to the complaint log tomorrow morning before our meeting. However, I will not have the information that you requested below within that timeframe.

\*\*\* 08/14/2012 04:57 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike



Yes, and whether it is weekly, bi-weekly or monthly. You've included the date

the service was restored; I want to determine how many pickups were missed.  
Thanks, Suzanne

\*\*\* 08/14/2012 04:58 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike



We can discuss tomorrow when you think you'll have the info. Thanks, Suzanne

\*\*\* 08/15/2012 08:08 AM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Suzanne, attached is an update to the master complaint log that I sent to you last Friday. As you can see, we have included information on the first 102 complaints. If column I is blank, we are still researching these customers. We will try to have information on these and the remaining complaints (103 - 117) [only thru 111 was included] along with the additional information you requested yesterday (their regular scheduled service day) by the end of the week.

SEE ATTACHED - updated spreadsheet of individual complaint status

\*\*\* 08/15/2012 08:40 AM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike



Thanks, Mike.

\*\*\* 08/15/2012 10:30 AM Phone: Suzanne Stillwell >> Mike Weinstein, Polly McNeil & Sharon Wallace



Teleconference about customer resolution. The company's position regarding crediting customers is to wait until the conclusion of the formal investigation. By Friday, 8/17, Mike will provide an updated spreadsheet that includes all complainants' resolution and add a column that will include the number of missed pickups per service for each customer.

\*\*\* 08/15/2012 01:47 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



Mike, this is one of the two complaints that I mentioned earlier. I am waiting to hear back from the other since she asked that her complaint be anonymous (we can't help if she doesn't provide her address). The due date is Friday, August 17. Suzanne

Forwarded Complaint 115023 IRENE

\*\*\* 08/15/2012 04:28 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



Mike, here is another strike-related complaint. Response is due Friday, August 17. Thank you, Suzanne

Forwarded Complaint 115037 Stanly Donogh


\*\*\* 08/16/2012 02:59 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



Mike, here is another strike-related complaint. The response is due Monday, August 20. Suzanne

Complaint 115044 Joe Zomar

\*\*\* 08/17/2012 03:10 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike


 Suzanne, attached is an update to the master complaint log that sent to you on Wednesday. As requested, we have added a column (column I) that shows the number, type and date the services were missed during the strike. We are still investigating a number of complaints where we have incomplete information (see those highlighted in yellow). In some instances, we are having difficulty locating the account either due to a lack of or error in an address or name or if we are having difficulty locating the account in our billing system.

Where there is a note regarding a lack of or error in an address or name could you please review the complaint again at your end and let us know if you can provide us with further information.


I will again try to give you a further update in the first part of next week.  
Thanks

SEE ATTACHED - updated spreadsheet of individual complaint status

\*\*\* 08/19/2012 03:45 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike


 Thank you, Mike. I will be out of the office until Thursday so you can provide your update by the end of Wednesday, 8/22. Suzanne

\*\*\* 08/19/2012 03:59 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com

 Mike, passing a new strike related complaint. Your response is due on August 22. Sincerely, Suzanne


Washington UTC Complaint 115063 Tassie Medlin

\*\*\* 08/22/2012 03:26 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike

 Suzanne, here is the latest update. We are continuing to research some of the accounts still highlighted in yellow. Mike Weinstein


SEE ATTACHED - updated spreadsheet of individual complaints

\*\*\* 08/23/2012 01:44 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com

 I am forwarding three complaints received from some of your customers about the strike situation. Your response is due not later than August 27. Thank you, Suzanne


Crowell, Walcker, and Harlin [for some reason the complaints did not forward over]

\*\*\* 08/23/2012 01:48 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com

 Her is one of the complaints that I referenced in the prior email.

115091 Customer: Kirstie Harlin

\*\*\* 08/23/2012 01:49 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com

 Here is the second complaint.

115085 Customer: Steve Walcker

\*\*\* 08/23/2012 01:50 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



Here is the third.

115080 Customer: JOHN CROWELL

\*\*\* 08/23/2012 01:58 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Suzanne, do you have any additional information from this customer? There is no address, phone number or account number identified?

\*\*\* 08/23/2012 02:00 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike



Sorry, no...there is an email address I noticed. Perhaps you can follow up that way.

\*\*\* 08/24/2012 03:09 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



Here are six more strike-related complaints. The response is due August 28.  
Thanks, Suzanne

115125 CRAIG AND JAYNA POIROT  
115126 LYNDA AND GEORGE WESSMAN  
115127 R MURRAY  
115128 SHARON GREGORY  
115129 SHAWN SULLIVAN  
115130 CYNTHIA STENSAA

\*\*\* 08/27/2012 07:22 AM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Suzanne, I question that Complaint #'s 115126 and 115129 are in fact complaints. Please review their commentary. Thanks

\*\*\* 08/28/2012 09:39 AM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Suzanne, attached is our most recent update to the complaint log. There are still about 12 complaints that we are still researching for more information. This log also includes information for complaints 115126 and 115129, which according to my e-mail to you yesterday, I believe are not in fact complaints.

Please let me know if you have any questions. Mike Weinstein

SEE ATTACHED - spreadsheet of customer resolutions

\*\*\* 08/28/2012 04:20 PM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



I am forwarding seven strike-related complaints. The response is due August 30.  
Thanks, Suzanne

Forwarded complaints:

115142 Leann Grauer  
115168 Deborah Nimmons  
115169 Steven Walcker

115170 Shan Dean  
115171 Kristen Bamford Wynne  
115179 Clyde Le Roy Griffey  
115184 Sabine Alde

\*\*\* 08/30/2012 Action: Suzanne Stillwell



SS out of the office 8/31 through 9/6.

\*\*\* 08/31/2012 03:38 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Suzanne, here is the latest update. We are continuing to research the remaining six accounts that are highlighted in yellow.

SEE ATTACHED - updated spreadsheet of individual complaint status

\*\*\* 09/07/2012 10:50 AM Email: Stillwell, Suzanne (UTC) >> mweinstein@wm.com



Passing two new complaints; your response is due September 11. Thanks, Suzanne

Complaint 115213 CLYDE L GRIFFEY

Complaint 115239 Cheri Briar

\*\*\* 09/07/2012 11:12 AM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Suzanne, I received complaint #115213 previously. It was submitted as complaint #115179 last week.

\*\*\* 09/07/2012 11:34 AM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike



Sure enough; sorry. We'll do better at double checking the names. Suzanne

\*\*\* 09/12/2012 02:54 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike (mweinst@wm.com)



I am forwarding a new complaint received from one your customers about the strike situation. Your response is due not later than September 14. Thank you, Suzanne

Complaint 115294 Margaret Godon

\*\*\* 09/14/2012 08:47 AM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike



Hi Mike! In reviewing the attachment, it includes only 111 customers and I have sent over 140. Please send me the more current report. Thanks, Suzanne

\*\*\* 09/14/2012 04:09 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike



Hi Mike! Maybe I am missing something, but the count still shows 111.

\*\*\* 09/17/2012 07:14 AM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Suzanne, all the information is there on the file. I just failed to expand the print range to go from line 111 to line 143. Here is the revised file that expands the print range.

SEE ATTACHED - updated spreadsheet of individual complaint status



\*\*\* 09/17/2012 08:58 AM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike



Thank you...I didn't even look at the file. Knowing that it was so large, I just printed it so it would be easier to read

\*\*\* 09/24/2012 02:24 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike (mweinst@wm.com)



Passing three new complaints that are strike-related; response is due 9/26.

Forwarded complaints:  
115319 Sandy Oellion  
115320 Lindsey Gilbreath  
115355 Steven Carlson

\*\*\* 09/25/2012 07:37 AM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Suzanne, I have previously received complaints 115319 and 115320 from Jennifer Whealy.

\*\*\* 09/26/2012 01:34 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Suzanne, attached is an update to the complaint log including the most recent complaints that you have sent to me.

SEE ATTACHED - updated spreadsheet of individual complaint status

\*\*\* 09/26/2012 02:11 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike



Thanks, Mike!

\*\*\* 10/12/2012 11:18 AM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



Suzanne, here is the most recent update to the log including the most recent two complaints received earlier this week.

SEE ATTACHED - updated spreadsheet of individual complaint status

\*\*\* 10/12/2012 11:29 AM Email: Stillwell, Suzanne (UTC) >> 'Weinstein, Mike'



Thanks Mike! Suzanne

\*\*\* 10/16/2012 04:00 PM Letter: Suzanne Stillwell >> Customers



Copy of letter that went to all customers, both email and hard copy for those customers without email.

Dear Waste Management customer:

I am responding to you about your concerns with Waste Management of Washington, Inc. (Waste Management) and its response to the recent labor dispute July 25 to Aug. 2. The company does not intend to provide credits for missed solid waste, recycling and yard waste collection during the labor dispute.

Washington Administrative Code (WAC) 480-70-391 states, "...Companies may [emphasis on may versus shall] offer customers a credit on the customers'

bill... The company is not obligated to provide credits. The company did allow customers to set out extra solid waste, recycling and yard waste on the next scheduled or available collection date at no additional charge. I have recorded violations in your informal complaint for every missed solid waste, recycling and yard waste collection.

The commission is conducting a formal investigation into Waste Management's actions during the labor dispute and the impacts on its customers. The docket number of this proceeding is TG-121265. Separately, the commission intends to consider whether to amend part of the industry standard tariff to address service interruptions due to labor disputes in docket number TG-010374. The results of these two proceedings will be posted on the commission's website at [www.utc.wa.gov](http://www.utc.wa.gov).

Thank you for sharing your concerns with the commission. If you have further questions or comments, please reply to this email or contact me at 1-888-333-WUTC (9882).

Sincerely,

Suzanne Stillwell, Consumer Protection  
Utilities and Transportation Commission

\*\*\* 10/16/2012 04:36 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike (mweinst@wm.com)



Mike, I am re-reviewing the activities associated with the informal/master complaint. In the following text you say that you believe that complaint numbers 114803, 114805, 114810, 114846, 114915 and 114928 are contract city customers. Did you verify that? If so, I will change the complaint to an inquiry for those complaints.

Also, I will be sending one more complaint to you. Sincerely, Suzanne

\*\*\* 10/16/2012 04:41 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike (mweinst@wm.com)



I agree with you that these two are not complaints and I will change them to inquiries.

08/27/2012 07:22 AM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike  
Suzanne, I question that Complaint #'s 115126 and 115129 are in fact complaints. Please review their commentary. Thanks

\*\*\* 10/16/2012 05:30 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike (mweinst@wm.com)



Mike, two complaints attached were missing on your spreadsheet (Hariharan and Dejong). Also, I will list some things that need to be changed in your printout to correspond with our complaints. Let me know if you want the actual copy of the complaint to ensure the addresses/phone nos. are correct. After you make the changes, please send me a clean version and I'll do one more check to make sure we're in sync with our records. Thanks, Suzanne


Line 32 114784 please check your records to see if it is Larry Butler or Buehler

Line 98 Your 114928 Michael Geer should be 114929

Line 99 Your 114929 Michelle Wenstrom should be 114934

Line 100 Your 114934 Fran Godding should be 114943  
Line 101 Your 114943 Jalme English should be 114947  
Line 102 Your 114947 Mike Peterson should be 114950  
Line 117 115000 delete; duplicate (see line 109 114965)  
Line 128 and 131 ok to delete; changed to an inquiry  
Line 135 115169 delete; duplicate (see line 124 115085)


Forwarded following complaints:  
115022 GLORIA HARIHARAN  
115055 SUE DEJONG

\*\*\* 10/17/2012 08:12 AM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike  



Suzanne, yes these are contract city customers. I know this because of the representations made to me by my associates, which is also evidenced by the unique customer account numbers that only apply to city contracts.

From: Stillwell, Suzanne (UTC) [mailto:SStillwe@utc.wa.gov]  
Sent: Tuesday, October 16, 2012 4:36 PM  
To: Weinstein, Mike  
Subject: WA - UTC request 114699 for Master complaint - Waste Management Sno-King (strike)


Mike, I am re-reviewing the activities associated with the informal/master complaint. In the following text you say that you believe that complaint numbers 114803, 114805, 114810, 114846, 114915 and 114928 are contract city customers. Did you verify that? If so, I will change the complaint to an inquiry for those complaints.

\*\*\* 10/17/2012 09:17 AM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike  


I will delete them as complaints and change them to inquiries.


\*\*\* 10/17/2012 09:45 AM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike (mweinst@wm.com)  


You can delete the Tracy Tallman complaint since it is not in your service area. Line 72 #114878.

\*\*\* 10/17/2012 10:59 AM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike  


Suzanne, attached is a revised complaint log that reflects the changes and additions from your previous e-mails earlier today.

SEE ATTACHED - updated spreadsheet of individual complaint status

\*\*\* 10/17/2012 11:46 AM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike (mweinst@wm.com)  


Passing new complaint.

115667 Robert Dirickson

\*\*\* 10/17/2012 05:14 PM Email: Suzanne Stillwell >> Michael Weinstein



Mike, 'looks like two more can be deleted since they are in the city limits of Seattle. Can you double check; and, if so, delete from your spreadsheet so we can get to a final count. I'm coming up with 136 complaints after deleting these two. Thanks, Suzanne

Line 46 114818 Steve Silcock, 8316 Dayton Ave. N., Seattle, WA 98103

Line 42 114814 Brad Hole, 916 NW 56th St., Seattle, WA 98107

\*\*\* 10/18/2012 03:56 PM Action: Suzanne Stillwell



Closed 135 associated complaints; waiting to hear about jurisdiction on two still open.

\*\*\* 10/19/2012 11:18 AM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike (mweinst@wm.com)



Hi Mike, yesterday I actually came up with 135 complaints not including the two that I'm waiting to hear back from you on. I am looking forward to wrapping up the informal complaints today and will want a final spreadsheet. Thanks, Suzanne

\*\*\* 10/25/2012 01:41 PM Action: Suzanne Stillwell



Assess WAC 480-70-386(b)(i) for late response (apparently Mike is on vacation until 10/29).

\*\*\* 10/30/2012 02:32 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike (mweinst@wm.com)



Mike, I haven't heard back from you about the following items from 10/17 and 10/19. I would like a final spreadsheet based on removing the 10/17 email below (presuming they are contract vs. jurisdictional). Thanks, Suzanne

----- Forwarded by Suzanne Stillwell on 10/30/2012 2:25:24 PM -----

Activity Log

10/17/2012 05:14 PM Email: Suzanne Stillwell >> Michael Weinstein

Complaint ID: 114699

Customer Name: Master complaint - Waste Management Sno-King (strike)

Mike, 'looks like two more can be deleted since they are in the city limits of Seattle. Can you double check; and, if so, delete from your spreadsheet so we can get to a final count. I'm coming up with 136 complaints after deleting these two. Thanks, Suzanne

Line 46 114818 Steve Silcock, 8316 Dayton Ave. N., Seattle, WA 98103

Line 42 114814 Brad Hole, 916 NW 56th St., Seattle, WA 98107

Activity Log

10/19/2012 11:18 AM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike

(mweinst@wm.com)

Complaint ID: 114699

Customer Name: Master complaint - Waste Management Sno-King (strike)

Hi Mike, yesterday I actually came up with 135 complaints not including the two that I'm waiting to hear back from you on. I am looking forward to wrapping up the informal complaints today and will want a final spreadsheet. Thanks,  
Suzanne

\*\*\* 10/30/2012 02:39 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



I am sorry Suzanne. I have been on vacation and just returned yesterday. I will try to get this to you shortly.

\*\*\* 10/30/2012 02:48 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike



You were correct to delete these two items. Here is the revised file that reflects 136 complaints.

SEE ATTACHED - final spreadsheet of complaint status

\*\*\* 10/30/2012 04:03 PM Action: Suzanne Stillwell



Added violation counts to company spreadsheet; 323 counts; 136 customers.

SEE ATTACHED - spreadsheet with violations

\*\*\* 10/30/2012 04:07 PM Violation: 480-70-386(b)(i) -



Violation for not responding timely. Passed additional questions on Oct 17 and 19. Did not receive response until Oct 30. 8 counts.

\*\*\* 10/30/2012 Violation: 480-70-236 -



136 customers with a total of 323 violations for each missed solid waste, recycling and/or yard waste collection during the labor dispute from July 25 to Aug. 2, 2012.

\*\*\* 10/31/2012 01:21 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike (mweinst@wm.com)



Mike,

I completed my informal investigation and closed 136 complaints relating to the labor dispute between Jul. 25 and Aug. 2. I recorded a total of 331 violations detailed below. Attached is a revised spreadsheet which includes a column showing the number of violations by customer.

- 323 counts of WAC 480-70-236 for missing the collection of 323 solid waste, recycling and/or lawn service from 136 customers

- 8 counts of WAC 480-70-386(b)(i) for a late response to my questions on Oct. 17 and 19

Following this email is the content of a letter I sent to each customer closing their informal complaint. The disposition is consumer upheld. Please note that the Consumer Protection section has an internal quality review program and all closed complaints are subject to possible review and/or re-opening. Thank you.  
Suzanne

Letter to Waste Management customers:

Dear Waste Management customer:

I am responding to you about your concerns with Waste Management of Washington, Inc. (Waste Management) and its response to the recent labor dispute July 25 to Aug. 2. The company does not intend to provide credits for missed solid waste, recycling and yard waste collection during the labor dispute.

Washington Administrative Code (WAC) 480-70-391 states, "...Companies may [emphasis on may versus shall] offer customers a credit on the customers' bill..." The company is not obligated to provide credits. The company did allow customers to set out extra solid waste, recycling and yard waste on the next scheduled or available collection date at no additional charge. I have recorded violations in your informal complaint for every missed solid waste, recycling and yard waste collection.


The commission is conducting a formal investigation into Waste Management's actions during the labor dispute and the impacts on its customers. The docket number of this proceeding is TG-121265. Separately, the commission intends to consider whether to amend part of the industry standard tariff to address service interruptions due to labor disputes in docket number TG-010374. The results of these two proceedings will be posted on the commission's website at [www.utc.wa.gov](http://www.utc.wa.gov).

Thank you for sharing your concerns with the commission. If you have further questions or comments, please reply to this email or contact me at 1-888-333-WUTC (9882).


Sincerely,

Suzanne Stillwell, Consumer Protection  
Utilities and Transportation Commission

SEE ATTACHED - spreadsheet of 136 customers, services missed and violations.

\*\*\* 10/31/2012 01:39 PM Email: Stillwell, Suzanne (UTC) << Weinstein, Mike  


I apologize for the late response on October 17 and 19. I was on vacation and out of town with little access to e-mail during that timeframe.

\*\*\* 10/31/2012 03:30 PM Email: Stillwell, Suzanne (UTC) >> Weinstein, Mike  


Mike, it is important to have someone fill in for you while you're gone to handle commission complaints. Other companies advise us ahead of time who will be replacing the primary representative, their contact information, the dates, etc. Suzanne