

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Speedishuttle Washington, LLC) Case No.: TC-143691
d/b/a Speedishuttle Seattle,)
Applicant)
Objection to Permanent Auto Transportation
Authority Application

1. The undersigned counsel files this objection on behalf of the following existing certificate holder:

Shuttle Express, Inc.
800 SW 16th St.
Renton, WA 98057
Attn.: Paul Kajanoff

2. Shuttle Express respectfully objects to the application for permanent auto transportation authority filed in this Docket TC-143691 by Speedishuttle Washington, LLC, d/b/a Speedishuttle Seattle, 1132 Bishop Street, Ste 2312, Honolulu, HI 96813 (“Applicant”). Applicant has requested a certificate of public convenience and necessity to provide service described as: “door to door passenger service between Seattle International Airport and points within King County.”

3. Shuttle Express is the named holder under existing Certificate of Public Convenience and Necessity number C-975 (copy attached) as provided under the provisions of RCW Title 81. Shuttle Express operates both door-to-door shared ride service as well as scheduled hotel service

1 in the greater Seattle/Tacoma metropolitan areas, including all the territory in King County
2 described by and within the scope of its certificate as detailed in several sections.
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4 4. The Applicant's requested service would completely overlap the existing authority of
5 Shuttle Express in King County, requesting identical service operating in the identical area as has
6 been granted by the certificate C-975. Shuttle Express actively provides this service and is
7 unaware of any current or past customer complaints regarding service not being provided to the
8 satisfaction of the Commission. Shuttle Express has an extensive fleet of vehicles of various
9 types and qualified and trained drivers. At this time Shuttle Express has more than enough
10 capacity in vehicles, drivers, and dispatch to meet the current demand for door to door service in
11 King County.
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13 5. Shuttle Express actively markets and promotes its services in ways reasonably
14 calculated to reach the traveling public and is constantly seeking to improve its services and
15 traveler awareness of its services. Allowing Applicant to overlap any portion of Shuttle
16 Express's authority would be harmful to the public interest in that it would upset the economics
17 of door to door share ride services and drive up the average cost per passenger, leading to fare
18 increases and reduced service quality. Since Shuttle Express already provides satisfactory
19 service of the type and locations for which applicant seeks authority, there is no need for the
20 Applicant's services.
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22 6. At this time, Shuttle Express expects to call up five to ten potential witnesses to
23 appear in support of this objection, with an estimated hearing time of one to two days, including
24 cross examination time.
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7. Due to the authority that Shuttle Express currently holds and the fact that Shuttle express already provides service in King County to the full extent of its authority, the only restrictive amendment that would eliminate its interest in the application would be an exclusion from all points currently certificated to Shuttle Express. That restriction would effectively allow service only to portions of the Mt. Baker – Snoqualmie National Forest, as well as uninhabited areas well east of Duvall, WA, specifically points inside King County but outside the 25 mile radius of the Seattle Tacoma International Airport, Boeing Field, Renton Airport, and Paine Field.

Dated this 12th day of November, 2014



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WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

1300 S EVERGREEN PARK DRIVE SW, PO BOX 47250

OLYMPIA, WA 98504-7250

(360) 664-1222

This certificate authorizes the following operations under the provisions of RCW Title 81:

Shuttle Express, Inc.
d/b/a Shuttle Express,
Go Shuttle Express,
Limos by Shuttle Express,
Downtown Airporter
800 SW 16th St
Renton, WA 98057

Cert No.
C-975

Passenger service between points in King County and waterfront terminals in Seattle.

Limitations: No service may be rendered hereunder between:

1. Hotels in the cities of Sea-Tac or Tukwila and Cruise Terminals #66 and #91.
2. South Center Mall and Cruise Terminals #66 and #91.

Between: The Seattle-Tacoma International Airport, Boeing Field, Renton Airport, and Paine Field and points within the Seattle Commercial Zone in King and Snohomish Counties and excluding points in Kitsap and Pierce Counties, described as follows:

- (a)) the municipality of Seattle;
- (b) All points within a line drawn fifteen miles beyond the municipal line of Seattle;
- (c) Those points in King County which are not within the area described in (b) of this subsection and which are west of a line beginning at the intersection of the line described in (b) of this subsection and Washington Highway 18, thence northerly along Washington Highway 18 to junction of Interstate Highway 90, thence westerly along Interstate Highway 90 to junction of Washington Highway 203, thence northerly along Washington Highway 203 to the King County line; and those points in Snohomish County, which are not within the area described in (b) of this subsection and which are west of Washington Highway 9.
- (d) All of any municipality any part of which is within the limits of the combined areas defined in (b) and (c) of this subsection; and
- (e) All of any municipality wholly surrounded, or so surrounded except for a water boundary, by the municipality of Seattle or by any other municipality included under the terms of (d) of this subsection.

Between: The Seattle-Tacoma International Airport, Boeing Field, Renton Airport and Paine Field and points within a 25 mile radius of these airports, excluding points in Kitsap and Pierce Counties.

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Between: The Seattle-Tacoma International Airport and points in Pierce County, excluding service to or from Fort Lewis Army Base, McChord Air Force Base, Pearls by the Sea in Purdy, Safeway at Pt. Fosdick Square in Gig Harbor, and Denny's Restaurant at 5924 - 6th Avenue in Tacoma.

RESTRICTIONS:

1) Service may not be provided to or from the Sheraton Tacoma Hotel, La Quinta Hotel, Quality Hotel, Sherwood Inn, Lakewood Motor Inn and Tacoma Inn-Best Western.

THE FOLLOWING AUTHORITY WAS OBTAINED BY TRANSFER FROM C-859 STANDING IN THE NAME OF SUBURBAN AIRPORTER, INC.

PASSENGER SERVICE BETWEEN:

Kirkland, Redmond, Bellevue, Mercer Island and Renton on the one hand and the Seattle-Tacoma International Airport on the other hand, via Interstate Highway 405 and connecting highways; subject to the following limitations: (1) The transportation service is limited to passengers, and their baggage, to or from Seattle-Tacoma International Airport. (2) No service is authorized except at points named. (3) Service at the said airport shall be conducted in accordance with authorization issued by the Port of Seattle and such authorization is a term of this certificate. In the event of failure to comply with such authorization, this certificate, after hearing, may be suspended or revoked, in whole or in part. The holder of this certificate shall file with the Commission a copy of each authorization, or cancellation thereof, issued by the Port of Seattle.

SUB. NO. 1 PASSENGER SERVICE BETWEEN:

Seattle-Tacoma International Airport, and/or Boeing Field Airport and Kirkland, Washington via county roads or city streets to Interstate 5 to Interstate 90 and/or SR 520, thence to their junction with Interstate 405, thence over Interstate 405 and County Roads to Kirkland. (a) Via Interstate 405 and County Roads to points lying between Kirkland and the Snohomish County line. (b) West of Bothell to a line drawn south from the Snohomish County line along NE 88th to NE 170th St., thence West to Lake Washington. (c) Issaquah in King County.

THE FOLLOWING AUTHORITY WAS OBTAINED BY TRANSFER FROM C-858 STANDING IN THE NAME OF COOMBS, ORVILLE J. & DIANE J.

PASSENGER SERVICE

BETWEEN:

Everett, the Everett Holiday Inn and Lynnwood and the Ramada Inn, 2140 North Northgate Way, Seattle, on the one hand and the Seattle-Tacoma International Airport on the other hand via local streets, Interstate Highway 5, State Road 518 or Interstate 405 and 99.

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BETWEEN:

Sherwood Inn located in the University District at the intersection of Interstate 5 and N.E. 45th St. and the Seattle-Tacoma International Airport via I-5 and N.E. 45th Street or alternate routes north and south.

LIMITATIONS:

1. No express service may be rendered hereunder except in the carrying of baggage of passengers.
2. No service may be rendered hereunder from, to or between intermediate points between Everett, the Everett Holiday Inn, Lynnwood and the Ramada Inn, 2140 North Northgate Way, Seattle, and the Sherwood Inn, Interstate 5 and N.E. 45th Street on the one hand and the Seattle-Tacoma International Airport on the other hand via local streets, Interstate Highway 5, State Road 518 or Interstate Highway 405 and 99 or alternate routes north and south.
3. The certificate shall remain effective only during the existence of satisfactory arrangements between the certificate holder and the Port of Seattle whereby the certificate holder shall be permitted to have access to and to afford the service under the certificate at the Seattle-Tacoma Airport.
4. The certificate holder must promptly furnish this Commission with a copy of any subsequent arrangements with the Port of Seattle which will change, modify, or expand any prior arrangements filed with the commission.

THE FOLLOWING AUTHORITY WAS OBTAINED BY TRANSFER FROM C-819
STANDING IN THE NAME OF EVERGREEN TRAILS, INC.

BETWEEN: Seattle and Seattle-Tacoma Airport.

LIMITATIONS:

1. Service hereunder is expressly limited to the transportation of airline passengers and flight crews between Seattle-Tacoma Airport on the one hand, and hotels, air and ground transportation office and facilities in Seattle on the other hand, at rates substantially higher than the fares of regular common carriers.
2. No express service may be rendered hereunder except in the carrying of baggage and excess baggage of passengers and flight crews.
3. No service may be rendered hereunder from, to or between intermediate points.

TC-120546

04-25-12

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION



By _____

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon the following party of record in this proceeding by U.S. mail:

David W. Wiley
Williams, Kastner & Gibbs PLLC
Two Union Square
601 Union Street, Suite 4100
Seattle, WA 98101

Dated at McLean, Virginia this 12th day of November, 2014.

A handwritten signature in cursive script, reading "Elishava Simon", is written above a horizontal line.

Elisheva Simon