

BEFORE THE WASHINGTON STATE UTILITIES
AND TRANSPORTATION COMMISSION

In the Matter of the Application of

PACIFIC NORTHWEST
TRANSPORTATION SERVICES, INC.
D/B/A CAPITAL AEROPORTER
AIRPORT SHUTTLE; CAPITAL
AEROPORTER TOURS & CHARTERS;
AIRPORT SHUTTLE; CAPITAL CITY
CHARTERS; PREMIER AIRPORT
SHUTTLE

For Authority to Operate as an Auto Transportation
Company in the State of Washington

Docket No. TC-240898

OBJECTION TO PERMANENT AUTO
TRANSPORTATION AUTHORITY
APPLICATION

1 Eagle Towncar Service LLC (Eagle Towncar or Company) hereby objects to the permanent application for extension of certificate C000862 (Application) filed by Pacific Northwest Transportation Services (PNTS) on November 20, 2024. This objection is filed by the undersigned attorneys on behalf of Eagle Towncar and its owner:

Mintesinot Selewondim
Eagle Towncar Service LLC
13420 Manor Way, Suite A3
Lynnwood, WA 98087
Auto Transportation Certificate TAC 071487
Charter and Excursion Services Certificate CH070852

2 Eagle Towncar was recently granted temporary authority under certificate TAC071487 by the Commission for scheduled service between five (5) Bellevue hotels and SeaTac International Airport in Docket TC-240717, pursuant to Order 02 entered on November 27, 2024. A copy of TAC 071487 is attached as Exhibit A. The Company's certificate provides for:

SCHEDULED NONSTOP PASSENGER BY RESERVATION ONLY BETWEEN downtown Bellevue Hotels and Sea-Tac Airport. Pickup/drop from Westin Bellevue, Hyatt Regency Bellevue, Hilton Garden Bellevue, Hilton Bellevue, Marriott Bellevue, and Seattle Tacoma (SeaTac) Airport via Interstate 405.

3 PNTS now seeks a broad extension of its certificate C-862 to provide scheduled service throughout much of the east side of Lake Washington. PNTS requests:

Scheduled Passenger Service between Seattle-Tacoma International Airport and the downtown areas of Redmond, Kirkland and Bellevue. Major hotels and ground transportation centers will be the pickup/dropoff locations in each of the listed Cities, using the I-405, I-90 or SR-520, to I-5 to SR-518 - dependent on the most favorable traffic conditions at the time of travel.

4 PNTS's request is overly broad, not required by the public convenience and necessity and should be denied.

5 But regardless of the scope of the geographic description in the Application, PNTS now coincidentally seeks authority for scheduled service between the same five hotels and SeaTac International Airport, as shown its proposed Service Area Map filed after Eagle Towncar's own application. *Compare* Docket TC-240898 (PNTS Service Area Map filed November 20, 2024) *with* Docket TC-240717 (Eagle Towncar Updated Service Area Map filed November 19, 2024). As such, Eagle Towncar provides the "same service" subsequently proposed by PNTS, and Eagle Towncar therefore has standing pursuant to WAC 480-30-116(2) to file the present Objection.

6 Because Eagle Towncar was granted temporary authority for the same service, in the same service territory, the Commission may not even grant PNTS a temporary extension of its certificate. WAC 480-30-156(1) provides that the Commission "is prohibited from granting a temporary certificate to operate in territory" contained in an existing or pending certificate application unless the incumbent does not object. Because Eagle Towncar has both existing and pending applications for the same service, in the same area, and Eagle Towncar has now files the present objection, Eagle Towncar alleges the Commission would err by granting PNTS even a temporary extension of its certificate prior to the completion of a brief adjudicative proceeding or another appropriate hearing.

7 PNTS's proposed extension of its certificate would completely overlap the authority granted to
Eagle Towncar in Docket TC-240717 and in its pending permanent application in Docket
TC-240856. If PNTS submitted a restrictive amendment to its Application, removing Bellevue
from its request, Eagle Towncar would consider withdrawing its objection.

8 Eagle Towncar submits that it is fully providing service to the satisfaction of the Commission.
Although the Company has just begun operations under its temporary certificate, Eagle Towncar
has strong relationships with the five Bellevue hotels at issue, and Eagle Towncar has invested in
three Mercedes Sprinter vans to provide the new scheduled service. Allowing PNTS to compete
for scheduled service at the same five hotels is unjustified and unreasonable. PNTS only applied
for authority to provide scheduled service in this area after Eagle Towncar proposed this service.

9 Eagle Towncar further requests the opportunity to present evidence disputing PNTS's
Application. Eagle Towncar will present approximately four to five witnesses and require three
hours of hearing time to support its own application over any subsequent, overlapping or
contemporaneous applications by PNTS. Finally, Eagle Towncar requests that PTNS'
application, as currently configured, be denied by the Commission.

DATED this 6th day of December, 2024.

Respectfully submitted,

s/ Michael S. Howard

Michael S. Howard, WSBA #41034

David W. Wiley WSBA #08614

WILLIAMS, KASTNER & GIBBS PLLC

601 Union Street, Suite 4100

Seattle, WA 98101-2380

Telephone: (206) 628-6600

mhoward@williamskastner.com

dwiley@williamskastner.com

Attorneys for Eagle Towncar Service, LLC

EXHIBIT A

WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E., Lacey, Washington 98503

PO Box 47250, Olympia, WA 98504-7250

(360) 664-1222

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

Eagle Towncar Service LLC
13420 Manor Way, Suite A3
Lynnwood, WA 98087

Certificate No.
TAC071487

Temporary Authority Approved in Docket TC-240717. Authority is valid for 180 days from date of approval.

SCHEDULED NONSTOP PASSENGER BY RESERVATION ONLY BETWEEN downtown Bellevue Hotels and Sea-Tac Airport. Pickup/drop from Westin Bellevue, Hyatt Regency Bellevue, Hilton Garden Bellevue, Hilton Bellevue, Marriott Bellevue, and Seattle Tacoma (SeaTac) Airport via Interstate 405.

TC-240717

November 27, 2024

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION



By
