

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In re Application No. D-079116 of  
CWA, INC. D/B/A CENTRAL  
WASHINGTON AIRPORTER,  
For a Certificate of Public Convenience and  
Necessity to Operate Motor Vehicles in  
Furnishing Passenger and Express Services as  
an Auto Transportation Company

Docket No. TC-021402  
CWA'S BRIEF IN SUPPORT OF  
APPLICATION

15 CWA, Inc., d/b/a Central Washington Airporter ("CWA") meets the requirements  
16 of RCW 81.68.040 to obtain a bus certificate. The evidence in the record shows that (1) the  
17 public convenience and necessity requires granting CWA's application, because there is a public  
18 need for CWA's proposed airporter service, (2) the existing certificate holder in the territory  
19 CWA seeks to serve does not meet the public need and thus does not offer satisfactory service,  
20 and (3) CWA is fit, willing, and able to provide the proposed service. Accordingly, the  
21 Commission should grant CWA's application.

22 **I. FACTS**

23 On October 14, 2002, CWA filed an "Application for Bus Certificate"  
24 ("Application") with the Commission seeking authority under RCW 81.68.040 to provide a  
25 premium airporter service involving "passenger service between Yakima, Ellensburg, Cle Elum,  
26 and Seattle-Tacoma International Airport and selected points in Downtown Seattle, with service

1 to intermediate points via State Route # 97 and Interstate Highways # 5, # 82, # 90, and # 405.”  
2 Wickkiser Testimony at Exhibit One, Attachment Seven. “No service will be provided between  
3 any points within King County.” Id. One of the points in downtown Seattle that CWA will  
4 serve is the Amtrak train station. Id. at Attachment Twelve. CWA will offer four round trips  
5 daily initially. Id. at Attachment Ten. CWA proposes this service because it believes there is a  
6 strong public need for a premium airporter serving this route. In support of its application, CWA  
7 is filing testimony of CWA’s president, Larry Wickkiser and nine public witnesses.

8 The Commission is holding a hearing on CWA’s application because the route  
9 CWA seeks to serve is presently served in part by Greyhound Bus Lines, Inc. (“Greyhound”).  
10 Greyhound offers bus service between Yakima, Ellensburg, Cle Elum and Greyhound’s  
11 downtown Seattle bus station. Importantly, Greyhound does not offer direct service from  
12 Yakima, Ellensburg, and Cle Elum to Sea-Tac Airport or Amtrak’s Seattle station, which are two  
13 locations CWA will serve.

14 **II. CWA MEETS THE BUS CERTIFICATE REQUIREMENTS.**

15 **A. The Standard For Obtaining A Bus Certificate**

16 CWA must meet three criteria. First, every applicant for a bus certificate must  
17 show that the public convenience and necessity require the service:

18  
19 No auto transportation company shall operate for the transportation of persons,  
20 and baggage, mail and express on the vehicles of auto transportation companies  
21 carrying passengers, for compensation between fixed termini or over a regular  
22 route in this state, without first having obtained from the commission under the  
23 revisions of this chapter, a certificate declaring that public convenience and  
24 necessity require such operation . . .

25 RCW 81.68.040. Second, CWA must show that the existing certificate holder in the area  
26 it seeks to serve, which is Greyhound, does not provide service to the satisfaction of the  
Commission:

The commission shall have the power, after hearing, when the applicant requests a  
certificate to operate in a territory already served by a certificate holder under this

1 chapter, only when the existing auto transportation company or companies  
2 serving such territory will not provide the same to the satisfaction of the  
3 Commission, and in all other cases with or without hearing, to issue said  
4 certificate as prayed for; or for good cause shown to refuse to issue same, or to  
5 issue it for the partial exercise only of said privilege sought, and may attach to the  
6 exercise of the rights granted by said certificate to such terms and conditions as,  
7 in its judgment, the public convenience and necessity may require.

8 RCW 81.68.040 (emphasis added). Third, CWA must show that it is “fit, willing, and able to  
9 provide the services requested under Chapter 81.68 RCW and Chapter 480-30 WAC.”

10 Valentinetti Order at ¶ 55. The First Supplemental Order asks CWA to prove that it meets these  
11 requirements by discussing the following issues raised by the Commission Staff:

- 12 (1) “The need for the service the applicant proposes to provide.”
- 13 (2) “The availability of existing services; [p]roblems with existing service, or  
14 why those currently providing service in the territory already served are  
15 not providing service to the satisfaction of the Commission; in other  
16 words, the reasons existing service don’t or can’t meet the need for  
17 service.”
- 18 (3) A description of “how not receiving the applicant’s proposed service will  
19 affect the individual or the individual’s business/organization.”

20 First Supplemental Order at ¶ 6; Letter of Mary Ann Tennyson at 1-2 (Feb. 12, 2003). The  
21 testimony and evidence presented by CWA shows that the Commission should grant CWA’s  
22 application, based on all these criteria.

23 **B. The public convenience and necessity require CWA’s service because there is a  
24 public need for it, and Greyhound’s existing service does not meet that need.**

25 CWA has introduced the testimony of nine public witnesses, all of whom say that  
26 they have a need for CWA’s proposed airporter service, that Greyhound’s existing service does  
not meet their needs, and that not receiving CWA’s service will affect them adversely. CWA’s  
first witness is Marisela Boochetti, a resident of Cle Elum, Washington. She travels to Seattle or  
Sea-Tac twelve to fifteen times per year from Cle Elum. Boochetti Testimony at 1, ll. 9-12. She  
says that she has “a need for a service like that offered by CWA” because “it would allow me to  
travel to Sea-Tac Airport or Seattle’s Amtrak station without changing buses.” Id. at 2, ll. 9-13.  
CWA’s service would thus “save a lot of time.” Id. She is aware that Greyhound offers a bus

1 service but believes that “Greyhound’s schedule and route do not meet my travel needs” because  
2 “Greyhound does not travel to Sea-Tac Airport or to Amtrak’s Seattle station.” Id. at 3, ll. 21-24.  
3 She would be adversely affected if CWA’s application were not granted, because the only way  
4 for her to reach Sea-Tac using Greyhound would be if she switched buses in downtown Seattle  
5 or took a cab from Greyhound’s Seattle bus station. Id. at 3, ll. 14-17. That “would be  
6 inconvenient.” Id.

7 Dale Spurlock travels to Seattle or Sea-Tac about five to eight times per year from  
8 Yakima. Spurlock Testimony at 1, ll. 10-15. He likes the fact that “CWA’s service would take  
9 me to Sea-Tac without a transfer or delay. It also has multiple departures and arrivals per day,  
10 which I want.” Id. at 3, ll. 10-15. In contrast, “Greyhound doesn’t meet my time schedules and  
11 needs, because it does not offer enough departures. It also does not go to the destination I want  
12 to go to, which is Sea-Tac Airport.” Id. He would be affected adversely if CWA’s application  
13 were not granted because he could not take the bus to the airport without switching buses or  
14 taking a cab from Greyhound’s bus station in Seattle. Id. at 3, ll. 18-23. He further believes that  
15 “the public is asking for an airporter with a convenient schedule for business and pleasure trips.”  
16 Id. at 2, ll. 25-26. He is aware of the public need for transportation options, because he works at  
17 the Yakima Valley Visitor and Convention Bureau. Id. at 1, ll. 8-9.

18 Debbie Strand, the Executive Director at Phoenix Economic Development Group  
19 in Ellensburg, Washington, travels “several times per month to Seattle and about a half dozen  
20 times per year to Sea-Tac.” Strand Testimony, at 1, ll. 11-14. She has a “need for a service [to  
21 Sea-Tac] like that offered by CWA” because it will allow her to “avoid parking, traffic,  
22 congestion, and adverse pass conditions” and it will “be fairly easy to schedule flights to  
23 coincide with CWA’s schedule.” Id. at 2, ll. 11-14 and at 3, ll. 1-3. Without CWA’s service,  
24 Greyhound would be her only bus transportation option to reach Sea-Tac. Yet she describes  
25 Greyhound’s existing service is “too time consuming and not convenient” because “[a]ccording  
26

1 to the Greyhound website it would take six hours to get to the airport,” since Greyhound does not  
2 offer direct service from Ellensburg to Sea-Tac. Id. at 3, ll 13-25.

3 CWA also has several travel agent witnesses who testified about their personal  
4 need for service, their clients’ need for service, and how Greyhound’s existing service does not  
5 meet their or their clients’ needs. The Commission “has accepted supporting testimony from  
6 travel agents, whose business is to serve clients with transportation needs. . . . [T]he agents can  
7 testify as to their own business experiences and to their client’s experiences. Commission  
8 Decision and Order, In re Application of Valentinetti, Docket TC-001566 at ¶ 21 (2002)  
9 (“Valentinetti Order”). One of these travel agents is Tracey Dusin, who is a resident of Yakima  
10 and the owner and manager of Town and Country Travel. She travels to Seattle or Sea-Tac  
11 about twenty times per year, generally from Yakima. Dusin Testimony at 1, ll. 1-12. She  
12 “probably would use CWA’s service if CWA’s application were granted” and “know[s] people  
13 would consider using a service like CWA.” Id. at 2, ll. 9-15. She feels that “[t]here needs to be a  
14 service that connects Yakima with Sea-Tac Airport.” She has noticed that “when my clients  
15 cannot get on Horizon flights originating in Yakima because they are full, they must drive to  
16 Seattle and pay for parking.” Id. at 2, ll. 14-19. She concludes that her clients “would use  
17 [CWA’s] service” to avoid that problem. Id. Without CWA’s service, her clients’ only bus  
18 transportation option would be Greyhound. She believes however that Greyhound’s existing  
19 service is inadequate because it “only travels between bus stations,” which requires passengers to  
20 take a cab or to switch buses in order to reach Sea-Tac or Amtrak’s Seattle station. Id. at 3,  
21 ll. 3-10.

22 Susanne Bull is a travel agent at Ellensburg Travel in Ellensburg, Washington.  
23 She travels from Ellensburg to Seattle or Sea-Tac about twenty five or more times per year. Bull  
24 Testimony at 1, ll. 1-11. She is looking for “a convenient way to get to the airport.” Id. at 1,  
25 ll. 24-25. She has “a need for a service like that proposed by CWA” because “[i]t would allow  
26 me to reach Sea-Tac Airport without changing buses in Seattle, which I must do if I use

1 Greyhound's service." Id. at 2, ll. 9-13. She also has found that "[s]ome of the clients I work  
2 with at the travel agency also prefer not to use Greyhound" because they must switch buses to  
3 reach Sea-Tac. Id. at 3, ll. 7-14. Also "the times when Greyhound's bus service operates are  
4 inconvenient." Id. Without CWA's service, Greyhound's "inconvenient" service would be the  
5 only bus transportation option to Sea-Tac and Seattle for her and her clients.

6 Mary Lou Snyder works at Global Travel in Yakima. Snyder Testimony, at 1,  
7 ll. 1-8. She travels from her home in Yakima or from the Yakima Airport to Seattle or Sea-Tac  
8 two or three times per month. Id. at 1, ll. 8-16. She has a need for a service like that offered by  
9 CWA because "[i]t offers more trips per day than Greyhound and goes directly to the airport."  
10 Snyder Testimony, at 2, ll. 11-12. She also believes that "[m]y customers at the travel agency  
11 would use" CWA's service. Id. at 2, ll. 19-21. Without CWA's service, their only bus  
12 transportation option to reach Sea-Tac is Greyhound. She states that Greyhound's service is "not  
13 convenient, and I would not use the service to go to Sea-Tac Airport," because Greyhound offers  
14 no direct service to Sea-Tac. Id. at 3, ll. 15-18.

15 Bob Clem is the Yakima Airport manager. Clem Testimony at 1, ll. 1-8. He  
16 travels from Yakima to Sea-Tac or Seattle "about ten to twelve times per year." Id. at 1, 9-17.  
17 He personally has a need for CWA's service because it goes to Sea-Tac Airport, "which is the  
18 destination I want to reach." Clem Testimony at 3, ll. 3-9. He finds Greyhound's service  
19 unsatisfactory because "Greyhound takes far too long to get to Seattle, and then I would need to  
20 catch another bus to Sea-Tac." Id. at 3, 18-20. Mr. Clem also testified about a survey conducted  
21 by the Yakima Airport in April 2002 showing that there is a strong public need for CWA's  
22 service. Id. at 3, l. 21 to 4, l. 3. The survey analyzed the impact on travel caused when United  
23 Express discontinued its air service between Yakima Airport and Sea-Tac. Once that occurred,  
24 Horizon was the only airline serving the Sea-Tac to Yakima route. It is now more expensive to  
25 fly to Sea-Tac, and there are fewer flights. The survey "revealed that, since United Express  
26 discontinued service between Yakima and Sea-Tac, a large number of people have begun to

1 drive between these points. These are people who would be very interested in a service like that  
2 proposed by CWA.” Id.

3 Alan Walker is the Executive Director of the Ellensburg Chamber of Commerce  
4 in Ellensburg, Washington. Walker Testimony at 1, ll. 1-9. He travels to Sea-Tac or Seattle  
5 between twenty five and thirty times per year from Ellensburg. Id. at 1, ll. 10-18. He would  
6 “consider using CWA’s service” and believes it “would be beneficial to many people residing in  
7 the Ellensburg area and those visiting.” Id. at 2, ll. 10-22. He does not believe that Greyhound’s  
8 bus service is satisfactory because “[i]t takes too long to get to Sea-Tac Airport, due to the fact  
9 you must switch buses in Seattle.” Id. at 3, ll. 10-12. He believes that Greyhound’s “schedule  
10 might meet my needs, but its route would not, and the quality of service would not.” Id.

11 Tami Walton is a resident of Ellensburg who travels to Seattle or Sea-Tac about  
12 three or four times a year. Walton Testimony at 1, ll. 1-11. She “would be interested in using  
13 CWA’s airporter service.” Id. at 2, ll. 6-8. She believes that Greyhound’s existing service to  
14 Sea-Tac or Seattle’s Amtrak’s station is “inconvenient” because it requires passengers to switch  
15 buses or take a cab from downtown Seattle. She finds that Greyhound’s scheduling and route  
16 does not meet her travel needs because “it does not go directly to Sea-Tac Airport or anywhere  
17 else I want to go.” Id. at 3, ll. 5-16.

18 The testimony of these witness shows that there is a strong public need for a bus  
19 service originating in Yakima, Ellensburg, and Cle Elum that will take passengers to Amtrak’s  
20 Seattle station and on to Sea-Tac. Each of these witnesses testified that Greyhound’s service is  
21 inadequate to meet this public need because Greyhound has no direct service to Amtrak’s Seattle  
22 station or Sea-Tac. These witnesses would thus be adversely affected if CWA’s application were  
23 not granted. This proves that the public convenience and necessity supports a grant of CWA’s  
24 application and that Greyhound’s service is not satisfactory.

1 C. CWA is fit, willing and able to provide the proposed service.

2 To determine whether an applicant is fit, willing and able to provide a service, the  
3 Commission will examine the expertise of the applicant. Valentinetti Order at ¶ 42. The  
4 Commission does not require an applicant “to demonstrate extensive experience in running a  
5 large business of the sort they seek to enter.” Id. at ¶ 43. The Commission will also examine  
6 whether the applicant is willing and able to comply with the Commission’s laws and rules.  
7 Order M.V.C. No. 1892, In re Lloyd’s Connection, Inc. d/b/a Airport Connection Airporter,  
8 Hearing No. D-2556 at 1 (December 1990). The Commission will review financial fitness,  
9 including the firm’s financial history. Order M.V.C. No. 1899, In re San Juan Airlines, Inc. d/b/a  
10 Shuttle Express, Hearing No. D-2589 at 1-2 (March 1991); modified, Order M.V.C. No. 1909  
11 (May 1991). However, “[t]he Commission does not consider an applicant’s financial condition  
12 to be a critical element in a grant of authority, so long as there is credible evidence that the  
13 applicant has sufficient financing to begin operations and continue them for a reasonable period  
14 while its business is building.” Valentinetti Order at ¶ 42.

15 CWA is fit, willing and able to provide the proposed service under these  
16 standards. First, CWA’s management has experience operating a airporter service and is fully  
17 capable of complying with the Commission’s rules, as CWA’s president Larry Wickkiser has  
18 testified. Mr. Wickkiser has been the president of Wickkiser International Companies, Inc.  
19 (“WIC”) for eighteen years. Wickkiser Testimony at 2, ll. 10-15. Throughout that time, WIC  
20 operated Airporter Shuttle, which provides “a scheduled airport transportation service with ten  
21 round-trips daily between Sea-Tac Airport and Blaine, Ferndale, Bellingham, Mount Vernon,  
22 Anacortes, Oak Harbor, Stanwood and Marysville, including intercounty transportation for the  
23 areas served.” Id. at 2, ll. 9-22. WIC also operated Bellair Charters, which provides charter  
24 service, for the past twelve years. Examples of Bellair Charters’ services include “a three-year  
25 contract with Skagit Transit to run the San Juan ferry parking shuttle during the summer months,  
26 a three-month parking shuttle for St. Joseph Hospital and a shuttle service for the 2002 Skagit



1 Valley Tulip Festival.” Id. Both Airporter Shuttle and Bellair Charters operate pursuant to  
2 WUTC certificates. Id. at Exhibit Two. Mr. Wickkiser’s experience with Airporter Shuttle and  
3 Bellair Charters “has familiarized [him] with all aspects of transportation service and operations,  
4 including regulations, safety, driver training, insurance, operations, maintenance, dispatch,  
5 reservations and marketing.” Id.

6 Other CWA managers also have substantial experience. Richard Johnson has a  
7 masters of business administration from Canada’s leading business school, the University of  
8 Western Ontario in London, and four years of experience with WIC. Id. at 3, ll. 10-16. Randy  
9 Ammerman has 30 years of experience in the motorcoach industry. Id. LeRoy Browell has ten  
10 years of experience in marketing both consumer products and services, such as Airporter Shuttle.  
11 Id.

12 CWA has the vehicles and maintenance procedures to operate the proposed  
13 service. CWA has already acquired four vehicles that it will use to provide the service. CWA  
14 will use “MCIMC9 motorcoaches with state-of-the-art Series 50 4 cycle engines. The coaches  
15 will have videocassette players, restrooms and reclining seats.” Id. at 3, ll. 19-23 and at  
16 Exhibit 3. CWA has a maintenance program for these vehicles. CWA will subcontract routine  
17 services such as fluid changes and vehicle inspections to A&A Motorcoach. Id. at 4, ll. 1-3.  
18 CWA will transfer vehicles to a WIC maintenance facility in Ferndale for more substantial  
19 maintenance such as suspension work. Id. Exhibit Four shows the maintenance and inspections  
20 that CWA will conduct at each 6,000 and 18,000 mile interval. Id. at Exhibit Four. CWA will  
21 also train its drivers how to conduct a pre-trip and post-trip inspection. Those inspections will  
22 follow a checklist, which is attached. Id. at Exhibit Five.

23 CWA will maintain vehicle maintenance files that contain permanent data on the  
24 vehicles, such as titles and licenses and all the maintenance records. Id. at 4, ll. 16-20. CWA  
25 will track all Vehicle Inspection Report (“VIR”) information on a computer database organized  
26

1 by vehicle number. CWA will also subcontract with A&A Motorcoach to clean the vehicles’  
2 interior and exterior after each run. Id. at 4, ll. 21-24.

3 CWA has procedures for keeping its vehicles running on schedule. CWA will use  
4 WIC’s 24-hour dispatch facility, which will track each run’s position. Id. at 5, ll. 11-15. CWA’s  
5 drivers will maintain radio contact with CWA’s administrative offices using a Nextel two-way  
6 radio service. Id. at 5, ll. 24-26. If a vehicle breaks down and cannot pick up passengers at a  
7 scheduled time, CWA has a back-up vehicle in Yakima that it can use. Id. at 5, ll. 15-20. CWA  
8 also has partnerships with two motorcoach companies, A&A Motorcoach in Yakima and Puget  
9 Sound Charters in Renton, that CWA can dispatch in an emergency situation. Id.

10 CWA’s drivers will be well trained and subject to ongoing monitoring. CWA will  
11 hire twelve drivers based in Yakima. Id. at 5, ll. 21-24. WIC will staff, initially interview and  
12 then train them. Id. CWA has driver hiring policies and procedures, and it will manage its  
13 drivers based on the policies in the Operators Handbook and the Employees Handbook, which  
14 WIC has used for eighteen years with Airporter Shuttle. Id. at 6, ll. 1-5. When hiring a driver,  
15 CWA will use the checklist that is attached to Mr. Wickkiser’s testimony as Exhibit Six. Id. at  
16 Exhibit Six. CWA’s training program includes pre-hire inspections of past experiences and  
17 records of drivers, two days of in-class training and testing, and three to five days of vehicle  
18 familiarization and on-the-road instructions. Id. at 6, ll. 8-11. WIC employs a full-time trainer  
19 who will train CWA’s drivers.

20 CWA will continue to monitor driver performance after they become employees.  
21 CWA’s safety trainer, Randy Ammerman, will ride with its drivers twice a year. Id. at 6,  
22 ll. 12-20. He will provide regular training and feedback for drivers. Mr. Ammerman is  
23 responsible for the daily operations of CWA, will contract with WIC for driver training and  
24 safety programs, and will implement the policies in CWA’s Operators Handbook and the  
25 Employees Handbook. Id. at 7, ll. 1-7. CWA “will also implement the procedures in the WUTC  
26 and WSP Guide to Achieving a Satisfactory Safety Record and Federal Motor Carrier Safety

1 Regulations, including, but not limited to, the Formal Accident Register, and Accident Analysis  
2 and Accident Frequency Program, Vehicle Inspection Reports (“VIR”) procedures, drug and  
3 alcohol policy and other procedures.” Id. at 6, ll. 13-21. CWA will comply fully with all  
4 Department of Transportation requirements, including the hours of service rules. To monitor  
5 hours of service, each driver will maintain a logbook. Id. at 6, ll. 21-26.

6 CWA has hired a marketing manager to advertise its service. Id. at 7, ll. 12-16.  
7 CWA anticipates using direct sales calls to introduce the service to local companies, and CWA  
8 will alert other potential passengers through advertising in local journals, newspapers, radio and  
9 on TV. Id. CWA will participate in local trade shows. Id.

10 CWA does not yet have a concession agreement with Sea-Tac to allow it to pick  
11 up and drop off passengers. It has however met with Sea-Tac Airport officials and received  
12 tentative approval to transport passengers to and from the Airport. Id. at 7, ll. 20-23.

13 CWA is financially capable of operating an airporter service. As Mr. Wickkiser  
14 explains, CWA has \$420,000 in assets and is financially sound. Id. at 7, ll. 23-25. Additional  
15 financial information is attached to CWA’s application. Id. at Attachment Fifteen of  
16 Exhibit One.

17 CWA will acquire lift-equipped vehicles to assist disabled customers. Id. at 5,  
18 ll. 1-5. Until that happens, CWA will hire A&A Motorcoach to transport disabled passengers.  
19 Id. CWA will apply to the Federal Transit Administration (“FTA”) for financial assistance in  
20 retrofitting vehicles with lifts under the FTA’s “5311 ADA” intercity grant program, with the  
21 expectation that the FTA will share the cost of the lift. Id.

22 CWA is currently negotiating insurance with either National Interstate or Lancer.  
23 Id. at 5, ll. 5-11. Once the WUTC approves its application, CWA will complete an insurance  
24 contract with one of these two companies and will submit a certificate of insurance to the WUTC  
25 prior to starting any operations. Id.

1 As this evidence shows, CWA has the managerial expertise, the necessary  
2 procedures, and the financial wherewithal to operate the proposed airporter service. Its  
3 management is also knowledgeable about applicable WUTC and Department of Transportation  
4 rules and is prepared to comply with them. Indeed, the management team at CWA has already  
5 been doing so for many years when operating Airporter Shuttle and Bellair Charter. Under these  
6 circumstances, it is clear that CWA is fit, willing and able to provide the proposed airporter  
7 service. The Commission thus should grant CWA's application.

8 **III. WAIVER OF INITIAL ORDER**

9 The Commission's First Supplemental Order asks CWA to include in this brief "a  
10 statement indicating whether CWA waives an Initial Order in this proceeding." First  
11 Supplemental Order at 2. CWA affirms that it waives an Initial Order in this proceeding. CWA  
12 believes that this will expedite CWA's ability to obtain a grant of its application and begin  
13 providing much-needed services to passengers along its route.

14 **IV. CONCLUSION**

15 CWA's evidence and testimony proves that (1) the public convenience and  
16 necessity requires a grant of CWA's application, because there is a strong public need for  
17 CWA's Airporter running between Yakima, Ellensburg, Amtrak's Seattle station and Sea-Tac  
18 Airport, (2) Greyhound does not provide satisfactory service because it does not meet the need  
19 for direct bus service to Seattle's Amtrak station or to Sea-Tac Airport, and (3) CWA is fit,  
20 willing and able to provide the proposed service. Accordingly, the Commission should grant  
21 CWA's application.

1 DATED this 27<sup>th</sup> day of February, 2003.

2 MILLER NASH LLP

3  
4 \_\_\_\_\_  
5 Brooks E. Harlow  
6 WSB No. 11843  
7 David L. Rice  
8 WSB No. 29180

9 Attorneys for Applicant CWA, Inc. d/b/a  
10 Central Washington Airporter  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

1 I hereby certify that I served the foregoing CWA's BRIEF IN SUPPORT OF  
2 APPLICATION on:

3 Mary M. Tennyson  
4 Assistant Attorney General  
5 Attorney General's Office  
6 1300 S. Evergreen Park Dr. SW  
7 P.O. Box 47250  
8 Olympia, Washington 98504-7250

9 by the following indicated method or methods:

- 10  by **mailing** full, true, and correct copies thereof in sealed, first-class postage-  
11 prepaid envelopes, addressed to the attorneys as shown above, the last-known  
12 office addresses of the attorneys, and deposited with the United States Postal  
13 Service at Seattle, Washington, on the date set forth below.
- 14  by **e-mailing** full, true, and correct copies thereof, addressed to the attorneys at  
15 their last-known e-mail addresses, on the date set forth below.

16 The undersigned hereby declares, under the penalty of perjury, that the foregoing  
17 statements are true and correct to the best of my knowledge.

18 Executed at Seattle, Washington, this 27<sup>th</sup> day of February, 2003.

19 \_\_\_\_\_  
20 Carol Munnerlyn  
21 Secretary

22  
23  
24  
25  
26 Certificate of Service