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October 20, 2017

Mr. Steve King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

Re: TV 170747 - Tara Chila d/b/a Moves for Seniors

Dear Director King:

Per my formal notice of appearance filed with the Commission on September 15, 2017, we represent Transit Systems, Inc. and its Moves for Seniors (“MFS”) division. As I have explained previously, Tara Chila is employed by MFS. She manages its social media content. She is not, and has never been, a truck driver.

MFS is currently scheduled to appear on October 25 to respond to the Commission’s complaint. MFS demands that a classification proceeding be commenced with respect to its operations in Washington State. *MFS objects to a brief adjudicative proceeding* and instead requests that this matter be set for a formal hearing at a time and location to be determined.

Simultaneously with this letter requesting a formal classification adjudication, MFS has filed a petition for declaratory relief. It has done so in this proceeding because the issues are related and both parties will benefit from consolidating the Petition for Declaratory Relief with the Commission’s complaint.

If you require any additional information before responding to this letter, please do not hesitate to contact me.

Very truly yours,

SIMBURG KETTER SHEPPARD  
& PURDY, LLP

/s/ Andrew D. Shafer  
ADS:ah