

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Case No.: TC-220090

Beeline Tours LTD.

d/b/a Seattle Express,

Applicant

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Objection to Extension of Existing Auto
Transportation Certificate C-1052
Application

1. The undersigned files this objection as an existing certificate holder:

Pacific Northwest Transportation Services, Inc.
d/b/a Premier Airport Shuttle/Capital Aeroporter

Physical Address:

5033 Harrison Ave NW
Olympia, WA 98502

Mailing Address:

PO Box 2163
Olympia, WA 98507-2163

2. Pacific Northwest Transportation Services, Inc. d/b/a Premier Airport Shuttle/Capital Aeroporter respectfully objects to the application for extension of existing auto transportation authority C-1052 filed in this Docket TC-220090 by Beeline Tours LTD., d/b/a Seattle Express, 8110 7th Ave S, Seattle, WA 98108, (“Applicant”).

The Applicant has requested an extension of certificate of public convenience and necessity to provide service described as “Scheduled service from Sea-Tac Airport to the Seattle cruise piers” - per Docket TC-220090 “38844 - 03-Beeline-CertExtensionAppl-2-9-22-”. Per Washington Utilities and Transportation Commission (UTC) - Docket Notice “3884 - 3884 - Docket Notice - Extend Authority Beeline”, the Applicant has requested an extension of certificate of public convenience and necessity to provide “SCHEDULED PASSENGER SERVICE BETWEEN: Sea-Tac Airport and the Seattle cruise piers”.

3. Premier Airport Shuttle/Capital Aeroporter is the named holder under existing Certificate of Public Convenience and Necessity number C-862 (copy attached) as provided under the provisions of RCW Title 81. Premier Airport Shuttle/Capital Aeroporter is authorized, provides and operates; Scheduled Passenger Service between Seattle-Tacoma International Airport, Seattle Waterfront Piers (aka Seattle Cruise Piers) and Downtown Seattle; Door to Door Passenger Service between the Seattle Waterfront Piers and points within King, Pierce, Snohomish and Kitsap Counties and Joint Base Lewis-McChord (JBLM); Door to Door Passenger Service between Seattle-Tacoma International Airport and points within King, Pierce, Snohomish and Kitsap Counties and Joint Base Lewis-McChord (JBLM); and will continue to operate scheduled service between the Sea-Tac Airport and the Seattle Cruise Piers, as well as all the territory in King County described by and within the scope of and under the UTC granted authority of said Certificate, as detailed in several sections.

4. The Applicant’s requested service would completely overlap the existing authority of Premier Airport Shuttle/Capital Aeroporter at the point sought, requesting identical same service as has been granted by the certificate **C-862 Page 3 “10. SCHEDULED PASSENGER SERVICE BETWEEN: Seattle-Tacoma International Airport, downtown Seattle Hotels and Seattle Waterfront Piers.”**

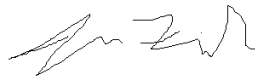
Premier Airport Shuttle/Capital Aeroporter actively provides this same service as applied for, and is unaware of any current or past customer complaints regarding service not being provided to the satisfaction of the Commission. Premier Airport Shuttle/Capital Aeroporter has an extensive fleet of passenger vehicles and qualified and trained drivers. At this time, Premier Airport Shuttle/Capital Aeroporter has more than enough capacity in vehicles, drivers, and dispatch to meet the current and future demands for services offered under Certificate C-862.

5. Premier Airport Shuttle/Capital Aeroporter actively markets and promotes its services in ways reasonably calculated to reach the traveling public and is constantly seeking to improve its services and traveler awareness of its services. Allowing the Applicant to overlap any portion of Premier Airport Shuttle/Capital Aeroporter's authority would be harmful to the public interest in that it would upset the economics of airport transportation and drive up the average cost per passenger, leading to fare increases and reduced service quality. Since Premier Airport Shuttle/Capital Aeroporter already provides satisfactory service of the type for which the Applicant seeks authority, there is no need for the Applicant's services.

6. At this time, Premier Airport Shuttle/Capital Aeroporter expects to call up five to ten potential witnesses to appear in support of this objection, with an estimated hearing time of one to two days, including cross examination time.

7. Due to the authority that Premier Airport Shuttle/Capital Aeroporter currently holds and the fact that Premier Airport Shuttle/Capital Aeroporter already provides the same scheduled service at the point sought 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 Premier Airport Shuttle/Capital Aeroporter or to deny the application.

Dated this 16th day of March, 2022



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CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon the following party of record in this proceeding email:

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Dated at Olympia, Washington this 16th day of March, 2022.



John Fricke