

October 22, 2014

72430.0100

VIA E-MAIL AND U.S. MAIL

Mr. Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
Attention: Records Center
PO Box 47250
1300 W. Evergreen Park Dr. SW
Olympia, WA 98504-7250

Re: Docket No. TS-143612 - In the Matter of the Petition of James and Clifford Courtney

for a Declaratory Order on the Applicability of RCW 81.84.010(1) and WAC 480-51-025(2);

Statement of Facts and Law on Behalf of Arrow Launch Services, Inc, BC-97

Dear Mr. King:

Enclosed please find a Statement of Facts and Law from Arrow Launch Services, Inc, BC-97, and attached Exhibits in the above-captioned Petition for Declaratory Order proceeding. Arrow Launch is now also providing, pursuant to WAC 480-07-145(3)(a), an original and twelve copies of this filing, but requests relief from the original and twelve copies rule for any subsequent filings consistent with proposed changes to the Commission's procedural rules and conventional standards in Title 81 proceedings. On behalf of the undersigned, we would also agree to electronic service only from this point forward as well. Please advise if you have further questions or concerns regarding this filing.

Very truly yours,

WILLIAMS, KASTNER & GIBBS PLLC

Dave W. Wiley

cc: Client

Michael Bindas, Esq.

Julian Beattie, Assistant Attorney General