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NOTE: An important notice to parties about administrative review appears at the end of this order.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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|-------------------------------|---|----------------------------|
| In re Application D-75275 of |) | ORDER M. V. C. NO. 1979 |
| |) | |
| SAN JUAN AIRLINES, INC. |) | DOCKET NO. D-75275 |
| d/b/a SHUTTLE EXPRESS |) | |
| |) | |
| for an extension of authority |) | |
| under C-975. |) | |
| |) | |
| |) | |
| EVERGREEN TRAILS, INC., a |) | DOCKET NO. TC-900407 |
| Washington corporation, d/b/a |) | |
| GRAYLINE OF SEATTLE, |) | FINDINGS OF FACT, |
| |) | CONCLUSIONS OF LAW |
| Complainant, |) | AND INITIAL ORDER |
| |) | GRANTING AMENDED |
| vs. |) | APPLICATION AND DISMISSING |
| |) | PETITION FOR REHEARING |
| SAN JUAN AIRLINES, INC., a |) | |
| Washington corporation, d/b/a |) | |
| SHUTTLE EXPRESS, |) | |
| |) | |
| Respondent. |) | |
| |) | |

This matter came on regularly for hearing on due and proper notice to all interested parties on March 31, May 7, and June 3, 1992 in Kent, Washington, before Administrative Law Judge Elmer E. Canfield of the Office of Administrative Hearings.

The parties were represented as follows:

**APPLICANT/
RESPONDENT:** SHUTTLE EXPRESS, INC.
By Bruce Wolf
Attorney at Law
6500 Columbia Center
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Seattle, Washington 98104-7003

**COMPLAINANT/
PROTESTANT:** EVERGREEN TRAILS, INC.
d/b/a GRAYLINE OF SEATTLE
By Clyde H. MacIver
Attorney at Law
4400 Two Union Square
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Seattle, Washington 98101

PROTESTANT/
INTERVENOR:

EVERETT AIRPORTER SERVICES ENTERPRISES
By Diane J. Coombs
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6303 Home Acres Road
Everett, Washington 98205

INTERVENOR:

PACIFIC NORTHWEST TRANSPORTATION SERVICES, INC.
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COMMISSION
STAFF:

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION
By Robert Cedarbaum
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MEMORANDUM

This matter involves a request for an extension of certificate authority of an auto transportation company and a rehearing of a complaint case against such company by another auto transportation company. On February 26, 1992, the Commission consolidated the rehearing on the complaint case, Docket No. TC-900407, and the extension application, Docket No. D-75275. The applicant amended its extension application and all protests and the one intervention were withdrawn. The applicant then submitted written shipper support statements. As set out below, the Administrative Law Judge proposes that the extension application, as amended, be granted. In view of the agreement and proposed amendment in the extension application, the complainant withdrew its request for a rehearing in the complaint matter; thus, the Petition for Rehearing should be dismissed.

San Juan Airlines, Inc., d/b/a Shuttle Express, now Shuttle Express, Inc., ("Shuttle Express") has held WUTC airporter authority since April, 1989. At this time, the Commission issued Certificate C-975 to Shuttle Express authorizing it to conduct passenger and express airporter service in various areas including, in relevant part, the municipality of Seattle. The applicant had demonstrated public need for such service within the municipality of Seattle. The certificate was limited to "on-call, door to door type service between airports served and any points within the territory served including residences, hotels and businesses."

Complaint proceeding, Docket No. TC-900407.

Docket No. TC-900407 is a complaint proceeding originally filed in April, 1990, by Evergreen Trails, Inc., d/b/a Grayline of Seattle ("Grayline") against Shuttle Express.

After a hearing in the complaint proceeding, the Commission found that Shuttle Express had violated its certificate by providing drive-up service to certain hotels named in Grayline's certificate, depriving Grayline of business. Thus, the Commission, on November 6, 1990 in Order M. V. C. No. 1893, amended the municipality of Seattle authority of Shuttle Express to prohibit service between Seattle-Tacoma International Airport ("Sea-Tac") and the hotels served by Grayline at that time, i.e., the Stouffer Madison Hotel, Crown Plaza, Four Seasons Olympic, Seattle Hilton, Seattle Sheraton, Westin, Warwick, Loyal Inn, Quality Inn, Days Inn, Downtown TraveLodge and Best Western Executive Inn. Prior to this time, Shuttle Express had served these hotels pursuant to its authority to serve the municipality of Seattle. The Commission imposed the hotel exclusion due to the violation of the "on-call" restriction by Shuttle Express.

On January 6, 1992, Grayline filed with the Commission a Petition for Rehearing in Docket No. TC-900407. It alleged continued violations by Shuttle Express. The Commission granted rehearing by order entered February 26, 1992.

Extension application, Docket No. D-75275.

In Docket No. D-75275, Shuttle Express ("applicant") initially sought to extend its certificate authority to operate without restriction throughout King, Pierce and Snohomish Counties. This application has since been amended, as will be discussed in detail below. As amended, the applicant seeks to delete four of the downtown Seattle hotels from the service exclusion in its certificate, thus allowing it again to serve the Loyal Inn, Quality Inn, Days Inn and Downtown TraveLodge. As mentioned above, the applicant originally held certificate authority to serve the entire municipality of Seattle before the Commission amended its authority to exclude certain downtown Seattle hotels pursuant to the complaint brought by Grayline.

Amendment to application.

Grayline and Shuttle Express reached an agreement concerning the applicant's service to downtown Seattle hotels, whereby Grayline no longer objected to the applicant providing airporter service to or from the Loyal Inn, Quality Inn, Days Inn and Downtown TraveLodge. The other hotels specifically excluded in applicant's certificate are to remain excluded. As will be

discussed later, the amendment makes additional restrictive provisions for service to or from downtown Seattle hotels first opening for business after May 1, 1992. The amendment also deletes the "on-call" restriction. Further, it adds certain exclusions to the Pierce County authority. The agreement between Grayline and the applicant is reflected in the amendment submitted to the Commission set forth below in the findings of fact.

As mentioned above, the agreement and amendment provide for the removal of the "on-call" restriction from the applicant's certificate. Previously, the customers of the applicant had been required to make telephone reservations with the applicant prior to being served. The applicant was prohibited from serving "walk up", "hail the van" and "opportunity fare" customers. This restriction has proven to be problematic over the years. It has not proven to be convenient for the traveling public. It has caused enforcement problems for the Commission. Its removal from the applicant's certificate is not contested by any other party. In this extension application, the applicant requests that this "on-call" restriction be deleted from its certificate. Removal of the "on-call" restriction will allow the applicant to serve customers whether or not they had first made a phone request for service. All protestants and the intervenor withdrew their objections to the applicant's request. Thus, the very carriers this "on-call" restriction was to protect have agreed to its elimination. Commission Staff did not object to the removal of the "on-call" restriction. The applicant provided adequate shipper support for the removal of this restriction; the restriction has caused difficulty and inconvenience to customers. The Administrative Law Judge concludes that removal of the "on-call" restriction is consistent with the public convenience and necessity and proposes that it be deleted from the applicant's certificate.

The agreement and amendment also provide for the deletion of four Seattle hotels from the list of excluded hotels. Thus, the applicant seeks to be able to again serve the Loyal Inn, Quality Inn, Days Inn and Downtown Travelodge. In a July 6, 1992 letter, Commission Staff objected to a statement of the applicant's transportation manager being admitted as support for service to these four hotels. The Administrative Law Judge agreed and rejected such statement. Commission Staff then went on to argue that there was a lack of support to serve the four hotels. As mentioned above, all protests to the applicant's extension application were withdrawn. Grayline, the carrier on whose behalf the exclusion was first imposed, has agreed to the deletion of these four hotels; Grayline does not object to the applicant's request to provide airporter service between Sea-Tac and these four hotels.

The Administrative Law Judge proposes that the Commission accept the amendment, which, in part, deletes the four downtown

Seattle hotels from the exclusion in applicant's certificate. As noted above, the applicant has already demonstrated public need to serve these facilities. The Commission has already granted certificate authority to the applicant to serve the municipality of Seattle. It was only on the complaint by Grayline in TC-900407 that this authority was restricted to exclude service to or from these named hotels. Now, Grayline, the carrier protected by this exclusion, agrees to the elimination of the restriction as applied to the Loyal Inn, Quality Inn, Days Inn and Downtown Travelodge. There are no objections to the removal of the restriction, except for the comment of Commission Staff about lack of support. Under the circumstances, the Administrative Law Judge rules that the applicant is not again required to demonstrate public need to serve these hotels. The applicant has already met its burden of proof with respect to this service when it originally applied. Removal of this restriction would be consistent with the public convenience and necessity. The amendment should be accepted; thus, the applicant would not be restricted against providing airporter service to or from the Loyal Inn, Quality Inn, Days Inn and Downtown Travelodge. The restriction will still apply to the eight other downtown hotels.

The amendment also adds additional restrictions on service to or from downtown Seattle hotels first opening for business after May 1, 1992. The applicant would be excluded from serving such hotels: unless the hotel is not served by Grayline under its Certificate No. C-819 within 90 days of opening; or during any period after which Grayline has failed to provide service under Certificate No. C-819 to such hotel for any period of 90 consecutive days; or unless Grayline has given written notice of its election not to provide service under Certificate No. C-819. Grayline has agreed to these provisions and has further agreed to provide such written notice to the Commission and the applicant. With this agreement from Grayline, Commission Staff agreed that the amendment should not cause enforcement problems.

The extension application, Docket No. D-75275, as amended, is consistent with the public convenience and necessity and should be granted.

Petition for Rehearing withdrawn.

In view of its agreement with Shuttle Express, complainant Grayline requested to withdraw its Petition for Rehearing in Docket No. TC-900407. The Commission granted the rehearing specifically at the request of Grayline. Now, the complainant has chosen to withdraw its rehearing request. Under these circumstances, it would serve no purpose to proceed with a rehearing in this matter. Grayline's request should be granted as being consistent with the public interest. Accordingly, the Petition for Rehearing in Docket No. TC-900407 should be dismissed.

FINDINGS OF FACT

1. On August 12, 1991, the applicant, Shuttle Express, Inc. (formerly San Juan Airlines, Inc., d/b/a Shuttle Express) filed with the Commission in Docket No. D-75275, an application for extension of Certificate of Public Convenience and Necessity No. C-975 to furnish passenger and express airporter service between points in Snohomish, King and Pierce Counties.

2. Proper notice of the application in Docket No. D-75275 was provided and the following carriers filed timely protests: Evergreen Trails, Inc., d/b/a Grayline of Seattle; Suburban Airporter, Inc.; Bremerton-Kitsap Airporter, Inc.; and Everett Airporter Services Enterprises (EASE).

3. At the commencement of the hearing, Pacific Northwest Transportation Services, Inc., d/b/a Capital Aeroporter, intervened in Docket Nos. D-75275 and TC-900407.

4. The applicant holds Certificate of Public Convenience and Necessity No. C-975. This certificate, along with the authority granted in this proceeding, is set out in Appendix A to this order. The applicant also holds charter party authority.

5. By letter dated September 26, 1991, the applicant requested leave to amend the application to exclude service between the Seattle-Tacoma International Airport and Fort Lewis, McChord, Pearls By The Sea in Purdy, Safeway at Pt. Fosdick Square in Gig Harbor and Denney's Restaurant at 5924 6th Avenue in Tacoma. The proposed amendment is not inconsistent with law, rule, regulation or Commission policy and should be accepted.

6. Subject to Commission acceptance of the proposed amendment, Bremerton-Kitsap Airporter, Inc. withdrew its protest in a letter to the Commission dated October 7, 1991.

7. At the hearing on June 3, 1992, the applicant further requested leave to amend its application. The earlier amendment and an intermediate amendment were incorporated into this June 3 amendment, Exhibit No. 3. This amendment is not inconsistent with law, rule, regulation or Commission policy and should be accepted. It will be set out below. The applicant amended its broad request for service in all of Snohomish, King and Pierce Counties essentially down to the authority it currently has, except for these three changes:

a) In the second paragraph of its current authority, the certificate reads that the applicant can provide passenger and express airporter service in the municipality of Seattle, excluding service to or from the Stouffer Madison Hotel, Crown Plaza, Four Seasons Olympic, Seattle Hilton, Seattle Sheraton, Westin, Warwick,

Loyal Inn, Quality Inn, Days Inn, Downtown TraveLodge and Best Western Executive Inn. In its amendment, the applicant proposes to delete four hotels from the service exclusion (Loyal Inn, Quality Inn, Days Inn and Downtown TraveLodge), such that it would be able to provide service to these four hotels if its proposed amendment is accepted. Service to the eight other listed hotels would still be excluded. The amendment goes on to propose this additional restriction:

and further excluding service to or from any hotels and/or motels located within the Downtown Seattle Area (as hereafter defined) that first open for business after May 1, 1992, provided, however, this exclusion as to hotels and/or motels that first open for business after May 1, 1992, shall not extend to any hotel and/or motel: (a) that is not served by Grayline of Seattle under Certificate No. C-819 within ninety (90) days of opening; (b) during any period after which Grayline of Seattle has failed to provide service under Certificate No. C-819 to such hotel and/or motel for any period of ninety (90) consecutive days; or (c) that Grayline of Seattle has given written notice of its election not to provide service under Certificate No. C-819. The Downtown Seattle Area is defined as follows:

- (A) Beginning at the intersection of Battery St. and 6th Ave., then southeast on 6th Avenue to Blanchard St., then northeast on Blanchard St. to 9th Ave., then southeast on 9th Ave. to Interstate 5, then south on Interstate 5 to Royal Brougham Way, then west on Royal Brougham Way to Alaskan Way S., then north on Alaskan Way S. (turning into Alaskan Way) to Battery St., then northeast on Battery St. to the intersection with 6th Ave.;
- (B) The term "within the Downtown Seattle Area" includes any property either partially or entirely within the Downtown Seattle Area or, even though partially or entirely outside the Downtown Seattle Area, which abuts Alaskan Way or Alaskan Way S.

Grayline, the other carrier referenced in this amendment, agreed to these provisions. Grayline agreed to provide such written notice to the Commission and the applicant.

b) The third paragraph on page 2 of the applicant's current authority provides for airporter service between Sea-Tac and points in Pierce County, excluding service to or from Fort Lewis Army Base and McCord Air Force Base. This authority remains as is, and, consistent with its September 26, 1991 amendment, the applicant proposes to further restrict its Pierce County service to exclude service between Sea-Tac and Pearls By The Sea in Purdy, Safeway at Pt. Fosdick Square in Gig Harbor and Denney's Restaurant at 5924 6th Avenue in Tacoma.

c) Five restrictions are listed on page two of the applicant's current certificate. In its amendment, the applicant proposes to delete Restriction No. 2, which provides that:

The carrier may offer only on-call, door to door type service between airports served and any points within the territory served including residences, hotels and businesses.

Thus, by deleting the "on-call" restriction, the applicant proposes to be able to serve passengers without the requirement that they must have first made a telephone request for service. It proposes to be able to serve the "walk up", "hail the van" and "opportunity fare" customers, as well as those that make reservations.

8. Based on the offering of the above amendments in Docket No. D-75275, Grayline and Everett Airporter Services Enterprises withdrew their protests. Pacific Northwest Transportation Services, Inc., d/b/a Capital Aeroporter, withdrew its intervention and opposition to the amended application and further withdrew its intervention in the complaint proceeding, TC-900407.

9. Although a protest to the application in Docket No. D-75275 was filed by Suburban Airporter, Inc., the applicant has since acquired Suburban Airporter and had its authority (C-859) transferred to the applicant. This is reflected in the applicant's certificate set forth in Appendix A.

10. Thus, the application, as amended, became uncontested at hearing and the applicant was granted leave to submit written shipper support statements.

11. Jimmy M. Sherrell, president of the applicant corporation appeared and testified as its operating witness. Shuttle Express, Inc., is a Washington corporation. Mr. Sherrell, Patty Sherrell, Gary Lasala and Sue Johnsen own just under four percent of the stock; the remainder is held in trust by M. H. Whittier.

12. The applicant proposes to continue operating out of its facilities located at 805 Lenora in Seattle. It has additional offices across the street and also has a staging area for its equipment two miles north of Sea-Tac. It currently has approximately 106 drivers. Its other employees include reservation people, dispatchers, accounting and sales/marketing personnel.

13. The applicant corporation has financial resources sufficient to conduct the proposed operations. It has operated at a profit for the last nine months through March, 1992.

14. The applicant currently operates 46 Dodge vans (seven passenger capacity). Each van is radio equipped. The applicant is in the process of purchasing 8 Ford vans (seven passenger capacity). The applicant's equipment is in good condition, regularly maintained and is suitable for the proposed operations.

15. The applicant has held passenger and express airporter service authority since April, 1989. Mr. Sherrell is familiar with the laws, Commission rules and regulations and intends to fully comply with these laws, rules and regulations.

16. Shipper statements supporting the proposed removal of the "on-call" restriction were submitted from Louise D. Robertson, Seattle; Shirley Powers, Seattle; Rose A. Osage, Tacoma; and Esthella G. Donovan. As provided for on the record, these statements are entered into evidence as late-filed Exhibit No. 8. These statements reflected frequent use of the applicant's services. They showed that the "on-call" restriction causes them difficulty and inconvenience. They urged the Commission to remove the "on-call" restriction. These statements taken together demonstrated a need for the applicant's service without the "on-call" restriction.

17. The one statement submitted from the applicant's transportation manager as evidence of need for airporter service between Sea-Tac and four Seattle hotels (Loyal Inn, Quality Inn, Days Inn and Downtown Travelodge) is rejected. This statement is not proper shipper support. The applicant was given an extension of time to submit additional statements. By letter dated July 31, 1992, the applicant elected to rely on the evidence of record; it did not submit additional statements.

18. On April 25, 1990, Grayline filed a complaint in Docket No. TC-900407 against Shuttle Express. Following a hearing, the Commission entered its final order resolving the complaint on November 6, 1990. The Commission, in Order M. V. C. No. 1893, finding that Shuttle Express had violated its authority, imposed a service limitation on Shuttle Express such that its airporter authority to serve the municipality of Seattle was restricted

against service to or from certain hotels served by Grayline, i.e., the Stouffer Madison Hotel, Crown Plaza, Four Seasons Olympic, Seattle Hilton, Seattle Sheraton, Westin, Warwick, Loyal Inn, Quality Inn, Days Inn, Downtown TraveLodge and Best Western Executive Inn.

19. On January 6, 1992, Grayline filed with the Commission a Petition for Rehearing in Docket No. TC-900407. Grayline alleged continued violations by Shuttle Express. Grayline later agreed to an amendment by Shuttle Express in its extension application (Docket No. D-75275) and requested leave to withdraw its Petition for Rehearing in TC-900407.

CONCLUSIONS OF LAW

1. The Washington Utilities and Transportation Commission has jurisdiction over the parties and subject matter of this application and complaint proceeding.

2. The applicant's proposed amendment contained in Exhibit No. 3 should be accepted.

3. The protests of Evergreen Trails, Inc., d/b/a Grayline of Seattle; Bremerton-Kitsap Airporter, Inc.; and Everett Airporter Services Enterprises (EASE) were withdrawn. Protestant Suburban Airporter, Inc. was acquired by the applicant. Intervenor Pacific Northwest Transportation Services, Inc., d/b/a Capital Aeroporter withdrew its intervention. These protests and the intervention should be dismissed.

4. The applicant has demonstrated public need for the service requested in this extension application, as amended, in Docket No. D-75275. A grant of such authority is consistent with the public convenience and necessity, and the application, as amended, should be granted pursuant to RCW 81.68.040. The "on-call" restriction is removed from the applicant's certificate. The applicant shall again have authority to serve the four requested downtown Seattle hotels (Loyal Inn, Quality Inn, Days Inn and Downtown TraveLodge). The applicant will still be excluded from serving the Stouffer Madison Hotel, Crown Plaza, Four Seasons Olympic, Seattle Hilton, Seattle Sheraton, Westin, Warwick and Best Western Executive Inn. A new restriction will be imposed for serving downtown Seattle hotels first opening for business after May 1, 1992. Additional restrictions are placed on service to and from certain facilities in Pierce County.

5. Complainant Grayline's request to withdraw its Petition for Rehearing in Docket No. TC-900407 is consistent with the public interest and should be granted. The Petition for Rehearing should be dismissed.

Based upon the proposed findings of fact and conclusions of law, the Administrative Law Judge makes and enters the following initial order.

O R D E R

IT IS ORDERED, That Application No. D-75275 of Shuttle Express, Inc. for extension of Certificate No. C-975 is granted, as amended; and that, contingent upon the applicant's compliance with the provisions of law and rule, a revised certificate shall be issued to the applicant as set forth in Appendix A, attached to this order and incorporated by this reference; and

IT IS FURTHER ORDERED, That, except as specified above, Application No. D-75275 is denied; and

IT IS FURTHER ORDERED, That the protests of Evergreen Trails, Inc., d/b/a Grayline of Seattle, Bremerton-Kitsap Airporter, Inc., Everett Airporter Services Enterprises (EASE), Suburban Airporter, Inc. and intervention of Pacific Northwest Transportation Services, Inc., d/b/a Capital Aeroporter are dismissed; and

IT IS FURTHER ORDERED, That Grayline's Petition for Rehearing in Docket No. TC-900407 is dismissed.

DATED at Olympia, Washington, and effective this 3rd day of September, 1992.

OFFICE OF ADMINISTRATIVE HEARINGS



ELMER E. CANFIELD
Administrative Law Judge

NOTICE TO PARTIES:

This is an initial order only. The action proposed in this order is not effective until a final order of the Utilities and Transportation Commission is entered. If you disagree with this initial order and want the Commission to consider your comments, you must take specific action within a time limit as outlined below.

Any party to this proceeding has twenty (20) days after the service date of this initial order to file a Petition for Administrative Review, under WAC 480-09-780(2). Requirements of a Petition are contained in WAC 480-09-780(4). As provided in WAC 480-09-780(5), any party may file an Answer to a Petition for Administrative

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Review within ten (10) days after service of the Petition. A Petition for Reopening may be filed by any party after the close of the record and before entry of a final order, under WAC 480-09-820(2). One copy of any Petition or Answer must be served on each party of record and each party's attorney or other authorized representative, with proof of service as required by WAC 480-09-120(2).

In accordance with WAC 480-09-100, all documents to be filed must be addressed to: Office of the Secretary, Washington Utilities and Transportation Commission, 1300 South Evergreen Park Drive S.W., PO Box 47250, Olympia, Washington, 98504-7250. After reviewing the Petitions for Administrative Review, Answers, briefs, and oral arguments, if any, the Commission will by final order affirm, reverse, or modify this initial order.

APPENDIX A

PASSENGER AND EXPRESS AIRPORTER SERVICE.

Between: The Seattle-Tacoma International Airport, Boeing Field, Renton Airport, and Paine Field and points within the Seattle Commercial Zone in King and Snohomish Counties and excluding points in Kitsap and Pierce Counties, described as follows:

(a) the municipality of Seattle; excluding service to or from the following hotel and/or motels

The Stouffer Madison Hotel, Crown Plaza, Four Seasons Olympic, Seattle Hilton, Seattle Sheraton, Westin, Warwick, and Best Western Executive Inn; and further excluding service to or from any hotels and/or motels located within the Downtown Seattle Area (as hereafter defined) that first open for business after May 1, 1992, provided, however, this exclusion as to hotels and/or motels that first open for business after May 1, 1992, shall not extend to any hotel and/or motel: (a) that is not served by Grayline of Seattle under Certificate No. C-819 within ninety (90) days of opening; (b) during any period after which Grayline of Seattle has failed to provide service under Certificate No. C-819 to such hotel and/or motel for any period of ninety (90) consecutive days; or (c) that Grayline of Seattle has given written notice of its election not to provide service under Certificate No. C-819. The Downtown Seattle Area is defined as follows:

(A) Beginning at the intersection of Battery St. and 6th Ave., then southeast on 6th Avenue to Blanchard St., then northeast on Blanchard St. to 9th Ave., then southeast on 9th Ave. to Interstate 5, then south on Interstate 5 to Royal Brougham Way, then west on Royal Brougham Way to Alaskan Way S., then north on Alaska Way S. (turning into Alaskan Way) to Battery St., then northeast on Battery St. to the Intersection with 6th Ave.;

(B) the term "within the Downtown Seattle Area" includes any property either partially or entirely within the Downtown Seattle Area or, even though partially or entirely outside the Downtown Seattle Area, which abuts Alaskan Way or Alaskan Way S.

(b) all points within a line drawn fifteen miles beyond the municipal line of Seattle;

(c) those points in King County which are not within the area described in (b) of this subsection and which are west of a line beginning at the intersection of the line described in (b) of this subsection and Washington Highway 18, thence northerly along Washington Highway 18 to junction of Interstate Highway 90, thence westerly along Interstate Highway 90 to junction of

Washington Highway 203, thence northerly along Washington Highway 203 to the King County line; and those points in Snohomish County, which are not within the area described in (b) of this subsection and which are west of Washington Highway 9.

(d) All of any municipality any part of which is within the limits of the combined areas defined in (b) and (c) of this subsection; and

(e) all of any municipality wholly surrounded, or so surrounded except for a water boundary, by the municipality of Seattle or by any other municipality included under the terms of (d) of this subsection.

Between: The Seattle-Tacoma International Airport, Boeing Field, Renton Airport and Paine Field and points within a 25 mile radius of these airports, excluding points in Kitsap and Pierce Counties.

Between: The Seattle-Tacoma International Airport and points in Pierce County, excluding service to or from Fort Lewis Army Base, McChord Air Force Base, Pearls by the Sea in Purdy, Safeway at Pt. Fosdick Square in Gig Harbor, and Denney's Restaurant at 5924 - 6th Avenue in Tacoma.

RESTRICTIONS:

1) This authority may not be transferred for three years from the date of issue.

2) Service may be provided in vehicles no larger than a seven passenger van.

3) Service may not be provided to or from the Sheraton Tacoma Hotel, La Quinta Hotel, Quality Hotel, Sherwood Inn, Lakewood Motor Inn and Tacoma Inn-Best Western.

4) Service may not be provided between Seattle-Tacoma International Airport, Boeing Field, Renton Airport, and Paine Field on the one hand and the Everett Pacific Hotel, the Everett Quality Inn on 128th Street, the Landmark in Lynnwood, the Northgate Ramada Inn, and the University Plaza Hotel on the other hand.

THE FOLLOWING AUTHORITY WAS OBTAINED BY TRANSFER FROM C-859 STANDING IN THE NAME OF SUBURBAN AIRPORTER, INC.

PASSENGER SERVICE BETWEEN:

Kirkland, Redmond, Bellevue, Mercer Island and Renton on the one hand and the Seattle-Tacoma International Airport on the other hand, via Interstate Highway 405 and connecting highways; subject to the following limitations: (1) The transportation service is limited to passengers, and their baggage, to or from

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Seattle-Tacoma International Airport. (2) No service is authorized except at points named. (3) Service at the said airport shall be conducted in accordance with authorization issued by the Port of Seattle and such authorization is a term of this certificate. In the event of failure to comply with such authorization, this certificate, after hearing, may be suspended or revoked, in whole or in part. The holder of this certificate shall file with the Commission a copy of each authorization, or cancellation thereof, issued by the Port of Seattle.

SUB. NO. 1 PASSENGER SERVICE BETWEEN:

Seattle-Tacoma International Airport, and/or Boeing Field Airport and Kirkland, Washington via county roads or city streets to Interstate 5 to Interstate 90 and/or SR 520, thence to their junction with Interstate 405, thence over Interstate 405 and County Roads to Kirkland. (a) Via Interstate 405 and County Roads to points lying between Kirkland and the Snohomish County line. (b) West of Bothell to a line drawn south from the Snohomish County line along NE 88th to NE 170th St., thence West to Lake Washington. (c) Issaquah in King County.

M. V. C. No. 1979