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Before the
Washington Utilities and Transportation Commission

In the Matter of the Application of Waste Management of Washington, Inc.
D/B/A WM Healthcare Solutions of Washington
Docket No. TG-120033

RESPONSE TESTIMONY OF CHRISTOPHER DUNN

On behalf of Waste Management of Washington, Inc.

November 16, 2012

Christopher Dunn

**In the Matter of the Application of Waste Management of
Washington, Inc.**

November 2, 2012



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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In Re Application of)
)
WASTE MANAGEMENT OF)
WASHINGTON, INC.)
d/b/a WM Healthcare Solutions) Docket No. TG-120033
of Washington)
720 4th Ave. Ste 400)
Kirkland, WA 98033-8136)

DEPOSITION UPON ORAL EXAMINATION

OF

CHRISTOPHER DUNN

Taken at 315 Fifth Avenue South, Suite 1000

Seattle, Washington

DATE TAKEN: November 2, 2012

REPORTED BY: KATHLEEN HAMILTON, RPR, CRR, CCR 1917

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A P P E A R A N C E S

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DEPOSITION OF CHRISTOPHER DUNN

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1 SEATTLE, WASHINGTON; NOVEMBER 2, 2012

2 9:33 A.M.

3 -o0o-

4

5 CHRISTOPHER DUNN witness herein, having been
6 first duly sworn on oath,
7 was examined and testified
8 as follows:

9

10 E X A M I N A T I O N

11 BY MS. GOLDMAN:

12 Q. Good morning, Mr. Dunn. My name is Jessica Goldman,
13 and I'm one of the attorneys representing Waste Management.

14 Have you had your deposition taken before?

15 A. Have I had it taken before?

16 Q. Have you done -- have you given testimony in this type
17 of a situation before?

18 A. Yes.

19 Q. Okay. How many times?

20 A. At least twice.

21 Q. Have you ever testified in a -- in court?

22 A. Hearing only.

23 Q. Okay. And what kind of hearing?

24 A. It was a labor dispute, and then there was also more
25 recently a Teamsters hearing.

1 correct?

2 MR. VAN KIRK: Objection to the form of the question.

3 THE WITNESS: Depending on the impact; that's correct.

4 BY MS. GOLDMAN:

5 Q. What percentage of the regulated medical waste in the
6 new territory is represented by the list of cities and counties
7 at the end of paragraph 15?

8 A. I wouldn't know that.

9 Q. You have any sense?

10 A. Percentage?

11 Q. Yeah.

12 A. What was your question again?

13 Q. What percentage of the regulated medical waste in the
14 new territory is represented by these cities and counties that
15 are identified at the end of paragraph 15?

16 A. I don't know that.

17 Q. Are you familiar with the Rehrig tubs that Stericycle
18 offers?

19 A. Yes.

20 Q. Why did Stericycle begin using those in 2011?

21 A. It's my belief that customers had asked for a
22 different type of lid. We do have a tub that we use across the
23 nation that's a gray container that has a attached lid. But in
24 the state we signify our gray containers that we currently use
25 as incinerate-only type containers, and we thought it'd be

1 confusing to say we're going to use something that Stericycle
2 uses in other places given that it's gray.

3 Q. Is this something that Stericycle's customers asked
4 for?

5 A. I believe so.

6 Q. Do you know that?

7 A. Just that I've heard that.

8 Q. Who have you heard that from?

9 A. Our sales folks and Mike Philpott have mentioned it.

10 Q. And what did your sales folks say about that?

11 A. There was interest in a lid that was attached to the
12 tub that folded into each other.

13 Q. And was there, to your knowledge, specific requests
14 for the Rehrigs?

15 A. I don't believe so.

16 Q. Have you had any conversations with Stericycle
17 customers at all about anything in 2011 or 2012?

18 A. Yes.

19 Q. Tell me what kind of circumstances do you come into
20 contact with customers.

21 A. If there is a driver issue, if there's a -- just the
22 other day I had a request to see their original contract, which
23 I sent out to them.

24 Q. How frequently do you have direct contact with
25 customers?

1 A. Three, four times a week.

2 Q. Okay. So what do you like about the Rehrig tubs?

3 MR. VAN KIRK: You mean him personally, not --

4 BY MS. GOLDMAN:

5 Q. Well, from a business perspective, what do you think
6 is good for Stericycle's customers?

7 A. If the customer likes it, then I like it.

8 Q. So do you have a sense of why the customer likes
9 Rehrig containers?

10 A. Just that I described that some wanted a lid that
11 folded in on each other that was attached to the tub. That's
12 it.

13 Q. So are your customers satisfied with that product?

14 A. No.

15 Q. Why not?

16 A. Some that we've given it to have given it back wanting
17 the older tub.

18 Q. Right. And are there some who have not given it back?

19 A. Yes.

20 Q. So how many have given it back?

21 A. Don't have an exact number. Small amount.

22 Q. Okay. Off the record.

23 (A break was taken
24 from 1:51 p.m. to 1:54 p.m.)

25 MS. GOLDMAN: I am done. I very much appreciate your

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C E R T I F I C A T E

STATE OF WASHINGTON
COUNTY OF KING

I, Kathleen Hamilton, a Certified Shorthand Reporter and Notary Public in and for the State of Washington, do hereby certify that the foregoing transcript of the deposition of CHRISTOPHER DUNN, having been duly sworn, on NOVEMBER 2, 2012, is true and accurate to the best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 12TH day of NOVEMBER, 2012.



KATHLEEN HAMILTON, RPR, CRR, CCR

My commission expires:
APRIL 2014