February 25, 2016

Washington Utilities and Transportation Commission

Steven King, Executive Director/Secretary

1300 Evergreen Park Drive SW

Olympia, WA 98502

Re: Commission waiver for relief from WAC 480-70-361 (1) (a)

Dear Sir:

Freedom 2000, LLC dba Cando Recycling and Disposal is a Solid Waste Collection Company operating under the jurisdiction of the Washington Utilities and Transportation Commission under Certificate Number G-63819 in the area of Whatcom County known as Point Roberts.

WAC 480-70-361 Availability of Information Section (1) indicates that “*A company that provides traditional solid waste services must maintain a business office...*” (1) (a) goes on to indicate “ *Regular business hours. Regular business hours must include at least 4 hours each day between 8:00 AM and 5:00 PM, Monday through Friday, excluding holidays.*”

For reasons outlined in the attached summary, we are requesting relief in the form of a waiver from the requirements of WAC 480-70-361 “*(1)* ***Company information.*** *A company that provides traditional solid waste service must maintain a business office and must, at least once a year, notify its customers of its: (a) Regular business hours. Regular business hours must include at least four hours each day between 8:00 a.m. and 5:00 p.m., Monday through Friday, excluding holidays...”* It is our desire to comply with all laws governing our certification. In this instance, we believe that maintaining traditional business hours in a staffed office, Monday through Friday for even four hours each day would be unduly onerous and an unnecessary extra expense, which we believe would have to be passed on to the consumer as a cost of conducting business. As an alternative, we are proposing to make our cellular telephone number available for customers to call in the event that they require contacting us, and that we would arrange to meet them at a mutually agreeable time at our offices if required.

Additionally, we emphasise that:

1. The company will respond to emergency customer inquiries within 24 hours, and all other inquiries within 48 hours as required in WAC 480-70-361(3)(a)
2. Per WAC 480-70-361(8) the company will make readily available to the public a copy of:
	1. The commissions solid waste rules, Chapter 480-70 WAC;
	2. The company’s current rates and regulations (tariff);
	3. The commission’s consumer brochure; and
	4. A map of the company’s service territory.

We thank you for your consideration of our request and look forward to your response.

Sincerely,

David Gellatly, Owner

Freedom 2000, LLC

DBA Cando Recycling and Disposal

Summary

In the six years that Freedom 2000 LLC has been certified by the WUTC to provide solid waste service to the community of Point Roberts, we have received 3 complaints. The record will show that our response has been almost immediate in each of the cases and that we have been diligent in reacting to our customers concerns regardless of the outcome or findings.

We are a small operation providing both residential and commercial curbside garbage and recycling collection services in a small (5 smiles square) and remote geographic region of Whatcom County. All collection services to the 275 residential and 30 commercial accounts are conducted on Monday each week and our weekly mileage does not exceed 50 miles. Additionally, our company maintains and operates a Transfer Station, under lease from Whatcom County which is open to the public on 2 and 3 days each week depending upon the season to accommodate self haul customers from within the geographic area.

Our operations have been uninterrupted, even in the event of a break down, bad weather or conditions beyond our control. In any event, if we were to be delayed for any reason, it is our policy to contact all of our customers by telephone and advise them of the resolution to the problem.

On a daily basis, Monday through Friday we check our voice mail for messages. On Mondays, our day of service to our curbside customers, we check the voicemail first thing in the morning before we commence our routes and then every 2 or 3 hours until the route is completed.

Our records indicate that we receive very few messages on days that our office is not open to the public. Those that are received are promptly handled. From September through June our transfer station is staffed and open to the public on Thursdays and Sundays from 12:00 Noon until 4:00 PM. In July and August our transfer station is staffed and open to the public on Tuesdays, Thursdays and Sundays from 11:00 AM until 5:00 PM.

Our office personnel consists of one part time person and as you can tell from our annual reports, our regulated revenue does not justify the additional expense of staffing an additional 4 days each week with no increase in revenue to offset.