

Mr. Steven V. King, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
Attn: Records Center  
PO Box 47250  
Olympia WA 98504-7250

Re: Request for Temporary Discontinuance of Service pursuant to WAC 480-30-186 and Request for Less than Statutory Notice. SpeediShuttle Washington, LLC (Certificate C065854).

Dear Mr. King:

SpeediShuttle Washington, LLC hereby requests approval to temporarily discontinue service under its Certificate pursuant to WAC 480-30-186 (2) on November 21, 2017. Information required by WAC 30-186 follows.

(i) The name, telephone number, mailing address, fax number (if any) and email address (if any) of a contact person;

H. Jack Roemer  
Phone: 808-772-5700 x110  
Fax: 808-772-5699  
Email: [jackr@speedishuttle.com](mailto:jackr@speedishuttle.com)

(ii) An explanation of the company's reasons for requesting approval to discontinue operations;

SpeediShuttle Seattle has spent over \$300,000 in legal fees defending our certificate, representing 20% of our revenue in the last twelve months and untold amounts of administrative time and travel expenses. This prevents us from either operating profitably or expanding our business and puts a cloud over our right to operate in Washington. We have actively sought a partner or outright buyer for our certificate to no avail due to the cloud. While we recognize the UTC has issued a Final Order that could ultimately remove that cloud. We were advised in writing on 10/31/17 by Jimmy Sherrell, CEO of Shuttle Express, as follows:

“We understand the litigation has been a drag on both companies, and we are committed to seeing it to its conclusion, if we don’t do this deal. Because of that, even if you win with a UTC decision, you will still be facing several years of what we believe would be strong appeals and losses during the winter slow months. Appeals could cost each of us up to \$300,000 more when it goes all the way to the state Supreme Court. And as a practical matter, we don’t see how you can sell your certificate to anyone as long as there is a possibility that some court would cancel or restrict it. Of course, if you lose, then your certificate will be basically worthless immediately. Assuming you would appeal, then again the ongoing legal costs will be hundreds of thousands of dollars. All the while, your certificate will remain unsaleable.”

SpeediShuttle Seattle  
c/o SpeediShuttle, LLC  
1020 Ulupono St.  
Honolulu, HI 96819

Received  
Records Management  
11/20/17 11:55  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

SpeediShuttle Seattle believes Mr. Sherrell's threat is real and will prevent us or a transferee from operating in Washington until the litigation is resolved and is therefore requesting a temporary discontinuance of service until such time as the WUTC, Shuttle Express and the Washington courts reach and final conclusion on our right to operate. SpeediShuttle Seattle requests the discontinuance to begin November 21, 2017 and continue until six months after the date on which Shuttle Express has exhausted all of its appeals related to ORDER 20/ORDER 13/ORDER 10 in DOCKETS TC-143691, TC-160516, and TC-161257 (Consolidated).

(iii) An explanation of consequences for the company if the commission does not approve the request to discontinue operations;

SpeediShuttle Washington's operation is not financially viable as long as the cloud of litigation over its Certificate remains. It no longer has the ability or desire to continue to fund the losses created by this protracted process.

(iv) A statement of the number of passengers, by class of service provided, who will lose service if the commission approves the discontinuance of operations;

SpeediShuttle Washington does not expect there to be any impact on passengers. All customers have already been notified, prepayments have been refunded and customers have arranged alternative transportation.

(v) An explanation of options available to the customers who will lose service; and

There exist a number of alternative transportation options to and from Sea-Tac Airport, including other auto transportation companies, public transportation, TNCs and taxis. Although we believe SpeediShuttle offers a service which was truly unique in the marketplace, our passengers will be able to locate replacement transportation, even if it is not truly of the same class offered by SpeediShuttle.

(vi) If the request is for approval to temporarily discontinue service, the written request must contain a statement declaring the date by which the company will return to service.

SpeediShuttle Washington is requesting to suspend service until the date which is six months after the date on which Shuttle Express has exhausted all of its appeals related to ORDER 20/ORDER 13/ORDER 10 in DOCKETS TC-143691, TC-160516, and TC-161257 (Consolidated).

Thank you for your consideration.

Respectfully,



H. Jack Roemer  
Chief Financial Officer