

Exhibit __
Dockets TG-091259 and TG-091019
Witness: Phaedra R. Fuller

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In re Application TG-091259 of

WEST WASTE & RECYCLING, INC.

For an Extension of Certificate No. G-251 for a
Certificate of Public Convenience and Necessity
to Operate Motor Vehicles in Furnishing Solid
Waste Collection Service

DOCKET NO. TG-091259

In re Application TG-091019 of

MURREY'S DISPOSAL COMPANY, INC.,
d/b/a OLYMPIC DISPOSAL

For an Extension of Certificate No. G-9 for a
Certificate of Public Convenience and Necessity
to Operate Motor Vehicles in Furnishing Solid
Waste Collection Service

DOCKET NO. TG-091019

**TESTIMONY OF
PHAEDRA R. FULLER IN SUPPORT OF
MURREY'S DISPOSAL COMPANY, INC. d/b/a
OLYMPIC DISPOSAL
CONTRACT SPECIALIST
NATIONAL PARK SERVICE
OLYMPIC NATIONAL PARK**

January 26, 2010

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I. IDENTIFICATION OF WITNESS

Q. What is your name and business address?

A. Phaedra R. Fuller
Contract Specialist
National Park Service
Olympic National Park
600 E. Park Avenue
Port Angeles, WA 98362-6798
Tel.: (360) 565-3009

Q. What is your current title at the Olympic National Park?

A. Contract Specialist.

Q. How long have you been employed by (Department of Interior, National Park Service) Olympic National Park?

A. Since 2000.

Q. Please describe your functions and job responsibilities as a Contract Specialist.

A. In my job as Contract Specialist I generally assist the Program Office with acquisition planning and market research, prepare solicitations, evaluate bid proposals and/or quotations and make determinations of responsibilities and price reasonableness. Amongst various other responsibilities I maintain and perform technical coordination duties for the National Parks Systems Acquisition System, maintain government purchase card logs, track purchases and conduct annual purchase card audits in accordance with National Park Service Policy and maintain various other current knowledge of federal procurement and acquisition policies and procedures in conjunction with federal appropriations law and the United States Code and federal regulations and federal employee ethical standards.

Q. Do you understand this is an application by Murrey's Disposal Company, Inc. d/b/a Olympic Disposal ("Olympic Disposal") for common carrier authority to provide coverage in the territory known as that portion of Section 12, T27 NR10W within Jefferson County?

A. Yes. We more commonly refer to this as the "Hoh Quadrant."

Q. In this area of the Olympic National Park, what are the Park's requirements for solid waste collection and disposal service?

1 A. Generally solid waste collection, transportation and disposal service in this area of the
2 National Park is required weekly in the peak summer season from June to September,
twice monthly in the October to May period and on-call when required.

3 **Q. How many pick ups and collections does this amount to?**

4 A. Approximately 10-2 yards picked up twice a week from the June to September period, a
5 container twice monthly in the October to May period as noted, and on-call service in
6 the October to May period in addition.

7 **Q. Do you have any basis to identify what the specific percentage that the Hoh
8 Quadrant represents to the overall Olympic National Park solid waste service in
terms of volume or frequency of pick ups?**

9 A. We estimate that the Hoh Quadrant represents approximately 10% or less of the overall
10 solid waste collection service volume in Olympic National Park.

11 **Q. Would authorization of duplicating service in the Hoh Quadrant be of any benefit
and/or convenience to the Park Service?**

12 A. Only to the extent that it would allow us to have overlapping service providers who
13 then compete on the economics or pricing of the Hoh Quadrant service which
14 admittedly is not a heavily utilized section of the Park.

15 **Q. Based on your experience in utilizing their services in the past, would Olympic
16 Disposal be able to provide service in the Hoh Quadrant?**

17 A. Yes, based on many years of experience of the Park Service with Olympic Disposal in
18 Olympic National Park and pursuant to their temporary common carrier certificate in
2009, we are fully confident Olympic Disposal could comprehensively and efficiently
provide solid waste collection service in the Hoh Quadrant.

19 **Q. Why are you supporting Olympic Disposal's efforts to extend its certificate to be
20 authorized to provide solid waste collection service in the Hoh Quadrant of the
21 Olympic National Park?**

22 A. We are supporting Olympic because the Park Service requires regular solid waste
23 collection service in the "Hoh Quadrant," and unless and until the Park Service reissues
24 Olympic Disposal a contract to serve the entire Park, there is presently no permanently
certificated carrier in the Hoh Quadrant, leaving an active solid waste-generating
section of the Park potentially without regulated certificated coverage.

25 **Q. What would be the consequences or impacts of a lack of certificated service in the
applied-for "Hoh Quadrant" territory?**

1 A. Clearly adverse environmental consequences could be posed if the lack of solid waste
2 collection pick-up and transportation caused illegal dumping in pristine wilderness
3 areas. Public health and safety impacts are also implicated if lack of a regular solid
4 waste collection in the Hoh Quadrant increased vermin or tended to attract Park wildlife
5 (such as bears) to forage for food in locales where waste was simply thrown to the side
of the road or scattered in the wilderness. Wildlife gathering where humans litter or
otherwise deposit garbage in uncontainerized states obviously is inconsistent as well
with natural resource stewardship and is risky and unhealthful to man and animal alike.

6 **Q. What would happen if Olympic Disposal's application were to be denied?**

7 A. Denial of Olympic Disposal's solid waste application would incrementally reduce
8 necessary public health and safety options available within the Park and hinder our
9 effort to provide necessary amenities to Park vendors and concessionaires. We
10 therefore believe it is imperative that Olympic Disposal be authorized to provide solid
waste collection service in the Hoh Quadrant in order to allow it to provide a more
complete and comprehensive service to the Olympic National Park.

11 **Q. Does this conclude your testimony in support of Olympic Disposal's application
12 for solid waste collection service in Olympic National Park?**

13 A. Yes, it does.

14 I certify or declare under penalty of perjury under the laws of the state of Washington
15 that the information contained in this statement is true and correct to the best of my
16 knowledge or belief.

17 Date: January 25, 2010


Phaedra R. Fuller

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