

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In re Application TC-220090 of

BEELINE TOURS LTD d/b/a SEATTLE
EXPRESS

For Extension of Certificate C-001052 of
Public Convenience and Necessity to
Operate Motor Vehicles in Furnishing
Passenger and Express Service as an Auto
Transportation Company

DOCKET TC-220090

MOTION TO WITHDRAW ON
BEHALF OF COMMISSION STAFF

1 By and through the Notice of Brief Adjudicative Proceeding issued by the
Washington Utilities and Transportation Commission (Commission) on March 22, 2022,
Commission staff (Staff) was identified as a participant in this proceeding. Pursuant to
Washington Administrative Code (WAC) section 480-07-380(3), Staff respectfully requests
that it be granted leave to withdraw.

2 WAC 480-07-380(3)(a) states:

Once the commission has issued a hearing notice or otherwise commenced
an adjudicative proceeding pursuant to chapter 34.05 RCW, a party may
withdraw from that proceeding . . . only upon permission granted by the
commission in response to a written motion.

3 WAC 480-07-380(3)(b) states that the Commission will “grant such a motion when
the requested withdrawal is in the public interest.”

4 The representatives of the other parties to this case, Beeline Tours LTD d/b/a Seattle
Express, and Pacific Northwest Transportation Services, Inc. d/b/a Premier Airport
Shuttle/Capital Aeroporter, have substantial experience appearing before the Commission,
and therefore have the resources to fully develop the facts necessary for the Commission to
decide this matter.

5 The conditions outlined above support granting Staff's motion to withdraw as in the public interest.

Dated this 11th day of April, 2022.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General

/s/ Daniel J. Teimouri, WSBA No. 47965
Assistant Attorney General
Office of the Attorney General
Utilities and Transportation Division
P.O. Box 40128
Olympia, WA 98504-0128
(360) 664-1189
daniel.teimouri@utc.wa.gov