



July 27, 2016

Mr. Steve King  
Executive Director  
Washington Utilities and Transportation Commission  
PO Box 47250  
Olympia, WA 98504-7250

by email to [sking@wutc.wa.gov](mailto:sking@wutc.wa.gov)

**RE: Initial Order in Docket TG-152228**

Dear Mr. King:

Republic Services would like to express our opposition to the recent application, docket number TG-15228, submitted by Bobby Wolford Truck and Demolition to receive a Permanent Solid Waste Carrier Authority in King and Snohomish counties. This application would be detrimental to our ability to provide service in the communities requested and will likely result in service degradation for residents located within the service area. Similarly, the basis of this request is founded on the false premise that equipment being provided by Bobby Wolford Trucking is unique and not provided by other haulers within the area and that we and other providers have denied services based upon the unavailability of this type of equipment.

We would like to categorically deny both acquisitions and state for the record that we are unaware of anyone within our service territory being denied services. Furthermore the type of equipment being used to justify this application is not significantly unique enough to warrant this type of incursion into our service territory.

We are sure that it goes without saying that the WUTCs G certificate has been designed to provide universal service to all entities within a set geographic boundary and to help stabilize rates for all. By allowing companies to enter a market claiming they have variations in services and equipment has a detrimental impact on our ability to provide consistent rates because prior experience has shown that companies will intentionally "Cherry-Pick" high value customers. There is nothing beneficial to this type of incursion and we would encourage staff to recommend denial of this application.

Should this application continue to be considered by the WUTC, Republic respectfully requests to be engaged in process and we are more than willing to provide additional details regarding why this permit should be denied. If you have any questions please do not hesitate to reach out to myself, contact information below, and I will ensure that your questions are directed to appropriate Republic team members. Thank you in advance for your consideration.

Sincerely,

Jim Hutchinson  
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