

**EXHIBIT A**

Transcript of the Testimony of

**Jeffrey Norton**

October 15, 2012

**In the Matter of the Application of Waste Management of  
Washington**

No. TG-120033



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BEFORE THE WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application            )  
of    )  
  )  
WASTE MANAGEMENT OF WASHINGTON,        ) Docket No. TG-120033  
INC., D/B/A WM HEALTHCARE                )  
SOLUTIONS OF WASHINGTON                 ) Order 05  
  )  
For an Extension of Certificate            )  
G-237 for a Certificate of Public         )  
Convenience and Necessity to            )  
Operate Motor Vehicles in                )  
Furnishing Solid Waste Collection        )  
Service                                        )

DEPOSITION OF JEFFREY NORTON

October 15, 2012

Seattle, Washington

Byers & Anderson, Inc.

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**Jeffrey Norton  
October 15, 2012**

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APPEARANCES

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APPEARANCES (Continuing)

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(appearing by phone):

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Also present: Jeff Daub  
Ron Adams  
Mike Philpott

1       **A**   **No.**

2       **Q**   Had you ever had -- when -- strike that.

3               When you were talking to these customers -- or  
4       strike that.

5               Again, these customer conversations, were they  
6       referring specifically to these Rehrig containers, or  
7       just talking about characteristics of containers that  
8       they would like to have?

9       **A**   **Generally talking about.**

10       **Q**   When did this happen? Was this at the beginning of your  
11       time with Waste Management or back when you were with  
12       Stericycle? Or both, I suppose?

13       **A**   **Both.**

14       **Q**   Okay. Now, you say in your testimony here, "Stericycle's  
15       black Steritubs were disliked by most of the customers  
16       that used them"; is that correct?

17       **A**   **That's correct.**

18       **Q**   And that knowledge is based on communications that  
19       customers made to you; correct?

20       **A**   **That's correct.**

21       **Q**   They would come and say, essentially, "We don't like  
22       these containers"; right?

23       **A**   **Essentially.**

24       **Q**   And you've sort of taken all those communications  
25       together and are now reporting it in your -- that most of

1 the customers disliked the Steritubs; correct?

2 **A That's correct.**

3 **Q** Can you mention any customers in particular who told you  
4 that?

5 **A** So I'm going to speak from my time when I worked at  
6 Stericycle.

7 **Q** Okay.

8 **A** At one time or another, I can mention -- let's see.

9 You want me to give you specific examples of -- I  
10 mean, I'm not going to remember exactly what was said,  
11 but --

12 **Q** Right now, I'm just asking who expressed that opinion,  
13 which --

14 **A** Okay.

15 **Q** -- customers expressed that opinion to you.

16 MS. GOLDMAN: Make sure you let him  
17 finish his question.

18 THE WITNESS: Yeah.

19 MS. GOLDMAN: Thank you.

20 **A** Providence; some of the Providence hospitals. Swedish.  
21 Northwest Hospital. St. Joseph's -- in Bellingham --  
22 Hospital. Virginia Mason Medical Center.

23 I know there are others, but I can't recall.

24 **Q** (By Mr. Van Kirk) All right. Do you have some idea  
25 about how many generators might have communicated this to

1 Q What's your understanding of the definition of a  
2 commercial recyclable?

3 **A For all intents and purposes, the commodity is being sent**  
4 **for -- to be reclaimed, either by parts or processed to**  
5 **reclaim parts of the commodity that could be resold and**  
6 **have value.**

7 Q Does it matter, in your understanding, how much of the  
8 collected waste ends up getting recycled --

9 **A No.**

10 Q -- or ends up being recyclable?

11 **A Doesn't matter to me, no.**

12 Q Do you have any knowledge of whether that matters for  
13 whether it's properly characterized as a commercial  
14 recycling?

15 **A I don't.**

16 Q Has this definition ever been revisited, now that you  
17 have these 17 and 28 percent numbers, to your knowledge?

18 **A Not to my knowledge.**

19 Q Let's talk about minimum monthly billing.

20 Now, you testified many small doctors and dentist  
21 offices do not generate enough waste to warrant monthly  
22 pickup, and dislike Stericycle's minimum fee.

23 Your testimony that they dislike the minimum fee,  
24 that's based on what various customers have told to you;  
25 right?

1       **A    Correct.**

2       **Q    So if it weren't for those communications, you wouldn't**  
3       **really know whether they disliked it or not?**

4       **A    I do know, because I know when we implemented when I**  
5       **worked at Stericycle, that it was not liked.**

6       **Q    Because customers told you that?**

7       **A    Correct. That's correct, yes.**

8       **Q    Okay. Do you have conversations with customers or**  
9       **potential customers about Stericycle's minimum monthly**  
10      **fee?**

11      **A    If they -- yeah, usually. If it's -- a certain customer**  
12      **falls in that category or they don't generate that much**  
13      **waste, then they're usually wanting a quote to know what**  
14      **our tariff rates are. And so that's usually discussed.**

15      **Q    How does Waste Management do billing for these -- I'm**  
16      **assuming -- strike that.**

17                I'm assuming most of these are going to be smaller  
18      **generators. Is that a fair statement?**

19      **A    Correct.**

20      **Q    So how does Waste Management handle its billing of the**  
21      **small generators? Is there any fee at all for a small**  
22      **generator other than just the fee for the amount of waste**  
23      **picked up?**

24      **A    Correct, just the fee, the tariff rate for the**  
25      **collection.**



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3 the State of Washington, do hereby  
4 certify:

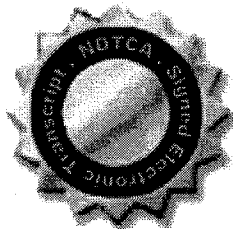
5 That the foregoing deposition of JEFFREY NORTON  
6 was taken before me and completed on October 15, 2012, and  
7 thereafter was transcribed under my direction; that the  
8 deposition is a full, true and complete transcript of the  
9 testimony of said witness, including all questions, answers,  
10 objections, motions and exceptions;

11 That the witness, before examination, was by me  
12 duly sworn to testify the truth, the whole truth, and  
13 nothing but the truth, and that the witness reserved the  
14 right of signature;

15 That I am not a relative, employee, attorney or  
16 counsel of any party to this action or relative or employee  
17 of any such attorney or counsel and that I am not  
18 financially interested in the said action or the outcome  
19 thereof;

20 That I am herewith securely sealing the said  
21 deposition and promptly delivering the same to  
22 Attorney Jared Van Kirk.

23 IN WITNESS WHEREOF, I have hereunto set my  
24 signature on October 19, 2012.



*Karmen Knudson*

Karmen M. Knudson, CCR, RPR, CRR  
Certified Court Reporter No. 1935.