

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

SHUTTLE EXPRESS, INC.,
Petitioner and Complainant,

v.

SPEEDISHUTTLE WASHINGTON,
LLC,
Respondent.

DOCKET NOS.
TC-143691 & TC-160516

FIRST DATA REQUESTS OF
SPEEDISHUTTLE WASHINGTON, LLC TO
SHUTTLE EXPRESS, INC.

TO: PETITIONER/COMPLAINANT SHUTTLE EXPRESS, INC.

Please respond to the following data requests pursuant to WAC 480-07-400 *et seq.*

“Commission” or “WUTC” below means the Washington Utilities and Transportation Commission.

I. DATA REQUESTS

1. When was the last time you provided “rescue service” or service to an airport passenger subject to WUTC jurisdiction by an independent contractor and/or a driver who was not an employee of Shuttle Express?
2. Please provide reviewed or audited financial statements for Shuttle Express, Inc. from 2013 to the present.
3. Provide a list of all lawsuits brought for or against Shuttle Express, Inc. in Washington State from 2013 to the present.
4. Describe in detail all efforts you initiated to have Speedishuttle Washington, LLC’s “Speedishuttle’s” decision in March 2015 reversed, revised or diminished/restricted by the Commission. Provide all written correspondence, emails, memoranda, notes or other contemporaneous records referencing contacts, meetings or efforts to cancel, restrict or otherwise diminish Speedishuttle’s certificate and/or “relitigate” the matter.

FIRST DATA REQUESTS OF SPEEDISHUTTLE WASHINGTON,
LLC TO SHUTTLE EXPRESS, INC -1

5. Please identify the first year following issuance of Shuttle Express' certificate from the WUTC in 1989, when you reported a profit in regulated operations to the Commission or any other entity.
6. Provide all written correspondence, emails, memoranda notes and/or any other contemporaneous records of contacts between the Port of Seattle and/or its staff and Shuttle Express from October 2014 to the present regarding prospective or existing service at Seattle-Tacoma International Airport by Speedishuttle.
7. Please provide a list of all formal complaint actions brought by third-parties and/or the WUTC staff against the operations of Shuttle Express from 1989 to the present at the WUTC by docket number, case name and date of Final Order.
8. Provide documents that reflect, show or relate to loans or capital investments to Complainant by shareholders, financial institutions, corporate affiliates, or third parties, including the amounts, dates, terms and any related documents, such as applications, agreements, bank statements, demands, repayments, reports, extension, renewals, guarantee financing agreements and/or security interests.
9. List all companies who provided regulated auto transportation service in Washington that have been acquired by you through asset purchase, stock acquisition or other method since 1989. Also, identify if any of those companies filed formal or informal complaints against Shuttle Express at the WUTC and/or in court since 1989 before or that were pending at the time Shuttle Express acquired them.
10. Provide any and all documents or data that reflect the background timing, notice to customers and/or the commission that reflect shuttle Express' decision to cease door-to-

door shared ride, reservation service between SeaTac Airport and any downtown Seattle or Bellevue hotels and the Seattle piers.

11. Provide copies of passenger reports to the Port of Seattle by Shuttle Express that reflect/earmark passenger counts by door-to-door and schedule service categories. Further provide any and all bases used to separate and classify passenger revenues in reports to the Port of Seattle and for annual regulatory fees paid to the WUTC.
12. Please provide a list of all entities including names, addresses and telephone numbers to whom you made payments or commissions as compensation for referrals or bookings from October, 2013 to the present including descriptions of all such arrangements. In answering, note whether any such agreements or arrangements have been submitted to the WUTC for review and approval and under what docket numbers and date of approval of Order.
13. Describe all arrangements from 2013 to the present by which Shuttle Express provides compensation for ticket commissions to various hotels or employees and contractors of such hotels, including but not limited to the Crowne Plaza, the Hyatt Regency Bellevue and the Westin Seattle. Has Shuttle Express sought and/or received approval for any such arrangements from the WUTC? If so, when was that approval received and under what docket numbers?
14. Please provide statistical data for each reservation or trip from January 1, 2013 to date between Sea Tac Airport and:
 - Bellevue/Eastgate: Hyatt Regency, Coast Hotel, Sheraton, Silver Cloud, Courtyard – Marriott, Residence Inn, Hotel Bellevue, Day’s Inn, Larkspur Landing, Embassy Suites, Courtyard Marriott, Hampton Inn;
 - Issaquah Area: Motel 6, Holiday Inn, Hilton Garden Inn; University District: McMahan Hall, Terry Hall, Lander Hall, University Inn, Hotel Deca, Silver Cloud, Watertown, Travelodge;

FIRST DATA REQUESTS OF SPEEDISHUTTLE WASHINGTON,
LLC TO SHUTTLE EXPRESS, INC -3

- Kirkland Area: Baymont Inn, Carlton Inn, Motel 6, Comfort Inn, Woodmark, LaQuinta;
- Overlake/Redmond Area: Redmond Inn, Silver Cloud, Courtyard – Marriott, Residence Inn, Fairfield Inn;
- Renton Area: Econolodge, Quality Inn & Suites;
- Seattle Area: Renaissance, Crowne Plaza, Fairmont Olympic, Sheraton, Grand Hyatt, Westin, Warwick, Hyatt at Olive 8, Quality Inn & Suites, Courtyard – Marriott, Springhill Suites, Four Points, Best Western Executive Inn, Silver Cloud, Edgewater, Marriott Waterfront, Motif, Hotel 5, Paramount, Maxwell Hotel, Pier 91, Pier 66, Holiday Inn, Holiday Inn & Suites, W Hotel; Northgate Area: Hotel Nexus;

including, but not limited to, Hudson date/time stamps for:

- reservation time of day,
- ready to go time of day,
- on board time of day,
- location and drop off time of day,
- service type, number of passengers,
- how they reserved the transportation (*e.g.*, phone, computer, smartphone, in person),
- the fare(s) paid,
- the number of passengers carried in each vehicle on the same trip,
- the number and location of stops per trip,
- the time for each trip, and
- Hudson system fields for TripID and ShiftID.

DATED this ____ day of September, 2016.

RESPECTFULLY SUBMITTED,

By _____
 David W. Wiley, WSBA #08614
dwiley@williamskastner.com
 Attorney for Speedishuttle Washington, LLC

CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2016, I caused to be served the foregoing document to the following address via email and or US mail: :

Julian Beattie Office of the Attorney General Utilities and Transportation Division 1400 S. Evergreen Park Dr. SW PO Box 40128 Olympia, WA 98504-0128 (360) 664-1192 Email: jbeattie@utc.wa.gov	Brooks Harlow Lukas, Nace, Gutierrez & Sachs, LLP 8300 Greensboro Dr. Suite 1200 McLean, VA 22102 (703) 584-8680 Email: bharlow@fcclaw.com
---	---

Dated at Seattle, Washington this 7th day of September, 2016.

Maggi Gruber
Legal Assistant