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18 September 2013

Utilities and Transportation Committee:

RE: Docket TC-130708

The most current rules in WAC 480-30 have my backing as the most efficient and expedient rules to apply when considering my company's application. As defined by these "new" rules, I do not offer the "same service" as the existing, protesting company and under this more streamlined approach to applicants, further adjudication would likely prove unnecessary. This would save all parties involved a lot of wasted time, traveling and expense to most likely reach the same conclusion that would be reached taking the more circuitous path required by the old rules and an evidentiary hearing.

I trust that the Commission can exercise their given authority to apply their most current rules to this application and do so with a clean conscience regarding fairness to the protestant. As the "Motion for Clarification" reminded, the protestant already answered the question of how best to handle new (SeaTac Direct's) application when participating in the making, amending and approving of the new rules back in 2012, which narrowed the scope of "same service" definition to one which should make our application non-objectionable.

Additionally, it is my understanding that even if the decision is made to apply the old rules to my case, I could circumvent it by withdrawing and reapplying in order to assure consideration under the current rules. While I prefer not to go through the whole process again, that I could seems to negate any question in which rules to apply.

Thank you for soliciting my response and considering my input.

Joel Kronenberg / President, Sea Tac Direct

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