

Transcript of the Testimony of

Jeffrey Norton

October 15, 2012

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

No. TG-120033



Byers and Anderson, Inc.

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1 Stericycle could offer a range of containers that the
2 smaller competitors out there didn't have or couldn't
3 offer?

4 **A** Correct.

5 When I worked at Stericycle, there -- or when I
6 worked at BFI -- excuse me -- one of our selling points
7 that I didn't mention was our containment versus the
8 Stericycle Steritubs, which is a container they designed.

9 And, yeah, that was a selling point. So being able
10 to offer different containers to customers that had
11 issues with those containers was important.

12 **Q** It was your experience that the large generators at least
13 valued having that choice between different kinds of
14 containers?

15 **A** Yes.

16 **Q** Now, you mentioned Steri-Safe. What is that, briefly?

17 **A** Steri-Safe, when it started, was sort of an OSHA program
18 for mostly small quantity generators.

19 At the time, when I did work for Stericycle, there
20 was a lot of cross-selling. You worked selling small
21 quantity and large quantity, even though that was, you
22 know, generally my job description.

23 So I helped launch the Steri-Safe program in
24 Washington. And at the time, we also offered hazardous
25 waste pickup through -- picking up all the dental waste,

1 from Waste Management?

2 **A I think a choice is good in all aspects of the business.**

3 **Q Do you know why Waste Management doesn't offer a choice**
4 **of different plastic medical waste containers?**

5 **A We have not had any complaints. In fact, all positive**
6 **comments about our containers. So there's been no need**
7 **to look into that at this point.**

8 **Q In your knowledge of customers, would service offerings**
9 **where customers could choose between a Rehrig container**
10 **and several other choices be better than services where**
11 **only the Rehrig containers were available?**

12 MS. GOLDMAN: I'm sorry, could I have
13 that read back, please.

14 (Question on Page 102,
15 Lines 8 through 11,
16 read by the reporter.)

17

18 MS. GOLDMAN: Objection. Asked and
19 answered.

20 **A Yes, choices are good.**

21 **Q (By Mr. Van Kirk) And that choice in particular?**

22 **A Correct.**

23 **Q Are you aware of any Stericycle customers that have tried**
24 **both the Rehrig and the Steritubs and decided not to go**
25 **with the Rehrig containers?**

1 asked you for different size containers than the ones
2 currently available?

3 **A** **Yes.**

4 **Q** Okay, tell me. Just tell me what happened in that
5 situation.

6 **A** **We had some customers that wanted a smaller than a 31-**
7 **gallon container, so we ordered -- this was after we had**
8 **filed our tariff. We ordered the 17-gallon Rehrig**
9 **container with dollies and step-on container ability;**
10 **some things that were requested from customers.**

11 **Q** Was that size not on your tariff at the time?

12 **A** **Correct.**

13 **Q** So you amended the tariff to add that?

14 **A** **I believe -- we charge per gallon, so I think we did do**
15 **an amendment, just put the container -- I think we have**
16 **something in there that says that we can -- as long as**
17 **the container is DOT and PG II approved, we'll charge the**
18 **same rates that are on there for that container.**

19 **Q** Has there ever been occasion where people have asked for
20 a different size container, that you haven't been able to
21 make available?

22 **A** **No.**

23 **Q** Do you know why Virginia Mason -- strike that.

24 In your testimony here with respect to the Rehrig
25 containers, you said Virginia Mason ended up keeping its

1 business with Stericycle.

2 **A Correct.**

3 **Q Do you know why they decided to stay with Stericycle?**

4 **A Andy Flodin mentioned to me that part of it is because**
5 **they're associated with Amerinet, which is a group**
6 **purchasing organization, and there was a 2 percent**
7 **rebate.**

8 **That, along with -- is there anything else?**

9 **That's the only thing that he mentioned to me. But**
10 **we were working on several multiple lines -- not that**
11 **Stericycle was in competition with -- recycling being one**
12 **of them, and even their pharmaceutical. But they were**
13 **not directly with Stericycle. They were with other**
14 **companies, competing.**

15 **Q Did Virginia Mason adopt your services in other areas?**

16 **A They did not.**

17 **Q So they didn't pick you for any of their service?**

18 **A That's correct.**

19 **Q Who was the person you mentioned was your contact?**

20 **A Andy Flodin.**

21 **Q And who is he? What's he do?**

22 **A He is the director of support services.**

23 **Q Okay.**

24 **A I believe that's his title.**

25 **Q Okay. Did you offer to reduce your recycling rates there**

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2) ss a certified court reporter in
3 County of Pierce) 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;

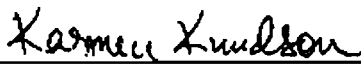

11 That the witness, before examination, was by me
12 duly sworn to testify the truth, the whole truth, and
13 nothing but the truth, and that the witness reserved the
14 right of signature;

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.

25

26 
27 Karmen M. Knudson, CCR, RPR, CRR
28 Certified Court Reporter No. 1935 

**Jeffrey Norton
October 15, 2012**