

Docket TC-200151
UTC Staff Data Request No. 2 to Shuttle Express, Inc.
October 22, 2020
Page 1

GENERAL INSTRUCTIONS FOR DISCOVERY

1. These data requests call for all information, including but not limited to information contained in documents or any other tangible or material thing that is known or available to Shuttle Express, and including all information in the possession, custody, or control of you or your agents, employees, contractors, attorneys, accountants, auditors, or other persons who are under your, or your attorney's employment, direction and/or control.
2. Please send all electronic documents and data in *native format*. For any documents that cannot be transmitted via email, please provide the documents on a **thumb drive**. Staff can no longer accept compact discs.
3. Please review all Excel documents and work papers for hidden cells. Hidden cells include hidden worksheets, columns, rows, and ranges. Please ensure that all items provided pursuant to these requests do not contain any hidden cells or formulas.
4. For any documents produced, **filenames may not contain any of the following characters:**
[] & " ' ? < > # { } % ~ / \ * : + | . _

DATA REQUEST DIRECTED TO: Shuttle Express, Inc.
REQUESTED BY: UTC Staff

UTC STAFF DATA REQUEST NO. 2

- a. Does Shuttle Express, Inc. (Shuttle Express or Company) have a compliance program in place to ensure compliance with Commission rules, state law, and the Company's tariff?
 1. If yes, how long has the compliance program been in effect?
- b. If the answer to the first question is yes:
 1. Who was responsible for Shuttle Express's compliance program from December 1, 2019, to January 31, 2020?
 - i. When did that individual first become responsible for Shuttle Express's compliance program?
 - ii. Does that individual still oversee the Company's compliance program?
 2. Who was previously responsible for Shuttle Express's compliance program?
 - i. From which date to which date did the previous individual oversee Shuttle Express's compliance program?
- c. In Dockets TC-143691, TC-160516, and TC-161257 (*Consolidated*), the Commission required Shuttle Express to modify its tariff to no longer permit the combination of door-to-door and scheduled services. Shuttle Express later complied by filing a tariff revision to remove the language from its tariff that was inconsistent with WAC 480-30-346(2)(d).
 1. Other than filing the tariff revision described above, what corrective actions did Shuttle Express take to ensure the Company would no longer combine door-to-door and scheduled services, including but not limited to revisions to the Company's compliance program?

Docket TC-200151
UTC Staff Data Request No. 2 to Shuttle Express, Inc.
October 22, 2020
Page 2

2. In light of the corrective action described above in response to part a, please explain how the violations regarding combining door-to-door and scheduled services described in the complaint in Docket TC-200151 occurred during December 2019 – January 2020.
3. Please provide any documents relied on in preparing the response to part 1 and/or 2 of this question.

/s/ Harry Fukano, WSBA No. 52458
Assistant Attorney General
Office of the Attorney General
Utilities and Transportation Division
P.O. Box 40128
Olympia, WA 98504-0128
(360) 664-1225
harry.fukano@utc.wa.gov

From: [Jimmy Sherrell](#)
To: [DeMarco, Betsy \(UTC\)](#)
Cc: [Suetake, Nina \(ATG\)](#); [Paisner, Ann \(ATG\)](#); [Gafken, Lisa \(ATG\)](#); [ATG MI PCC Sea EF](#); [Laycock, Sarah E \(ATG\)](#); [Johnson, Thomas \(ATG\)](#); [Mak, Chanda \(ATG\)](#); [Burdet, Kevin \(ATG\)](#); [Fukano, Harry \(UTC\)](#); [Roberson, Jeff \(UTC\)](#); [Nguyen-Le, Hang \(UTC\)](#)
Subject: RE: TC-200151 - Shuttle Express - Staff DR No. 2 to Shuttle Express
Date: Friday, November 6, 2020 10:16:59 AM
Attachments: [image002.png](#)

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

DOCKET TC-200151

UTC Staff Data Request No. 2 from Shuttle Express, Inc.

Page 1

DATA RESPONSE TO UTC STAFF

DATA RESPONSE BY: Jimmy Sherrell

UTC STAFF DATA REQUEST RESPONSE TO NO 2

- a. Shuttle Express has/had a compliance program in place to ensure compliance with Commission rules, state law, and company tariff.
 1. Shuttle Express compliance program has been in effect for over 30 years.
- b. Yes:
 1. Paula Burckhard was responsible for UTC required records and compliance of driver requirements. Compliance was Kere Greene and Jimmy Sherrell from December 1, 2019 to January 31, 2020.
 - i. Paula Burckhard 2017, Kere Greene 2017, Jimmy Sherrell 1983.
 - ii. Shuttle Express is no longer operating and will not resume operations.
 2. Wesley Marks, Director of Compliance was previously responsible for Shuttle Express compliance Program.
 - i. Mr. Marks was responsible from 2012 to 2017.
- c. Shuttle Express was complying to company tariff by performing Scheduled service when combined with door-to-door, first off and last on. This testimony is contained in previous testimony. For the record this is not disputed by Shuttle Express. There is no, not 1, consumer complaints of Shuttle operations by the public. Getting travelers out of the airport in the same vehicle, not having them wait hours for the same vehicle to return to the airport to perform a different service is not in the Public Interest. Shuttle was not blatantly violating UTC regulations, to the contrary, Shuttle was

performing service in the Public Interest. When staff reviewed records there was total cooperation by Shuttle Express in all aspects of the audit.

1, 2. Answer in c. above. UTC audit staff has all records as requested.

Jimmy Sherrell
Founder / CEO
Cell 206-930-6057



Corporate + Group Transportation | Black Car Service | Airport, Shared + Private