

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUESTS

DATE PREPARED: August 31, 2016
DOCKET: TC-143691, TC-160516
REQUESTER: Shuttle Express, Inc.

WITNESS: Jack Roemer
RESPONDER: Jack Roemer, Dave Wiley
TELEPHONE: (206) 233-2895

Data Request No. 6:

Please provide statistical data for each reservation or trip to or from Sea Tac Airport 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 served in the market to or from SeaTac Airport, how they reserved the transportation (*e.g.*, phone, computer, smartphone, in person, language used), the fare(s) paid, whether or not they spoke English, whether they used Wi-Fi or watched TV, the number of passengers carried in each vehicle on the same trip, the number of stops per trip, the time for each trip, and Hudson system fields for TripID and ShiftID.

RESPONSE to Data Request No. 6:

Speedishuttle objects to providing its competitor with readily identifiable customer information as well as data that is proprietary and could be directly used to harm its position in the marketplace. Speedishuttle asserts the request is also unduly burdensome, overbroad and oppressive and seeks information that is not compiled in the format requested. Speedishuttle also objects to the request as irrelevant in the discovery sense as to “whether they used Wi-Fi or watched TV” or “how they reserved the transportation,” load factors, time for each trip, etc. and further objects that this request is imposed for an improper competitive purpose in the absence of a circumscribed protective order. Moreover, without waiving its objections, Speedishuttle does not record, measure or otherwise monitor which of its shared ride passengers watch or use Speedi TV or Wi-Fi. The Commission did not limit Speedishuttle’s proposed certificated service to only customers who qualified as “differentiation factors” under WAC 480-30-140 in its application, and rejected similar restrictions sought previously by Shuttle Express in Order 04 ¶ 25.

Subject to and without waiving the foregoing objections, Speedishuttle does not track much of the information sought by the above request.