

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

SHUTTLE EXPRESS, INC.,
 Petitioner and Complainant,
 v.
 SPEEDISHUTTLE WASHINGTON, LLC,
 Respondent.

SPEEDISHUTTLE WASHINGTON LLC
 d/b/a SPEEDISHUTTLE SEATTLE,
 Complainant,
 v.
 SHUTTLE EXPRESS, INC.,
 Respondent.

DOCKET NOS.
 TC-143691, TC-160516 & TC-161257
 ERRATA TO PRE-FILED TESTIMONY OF
 H. JACK ROEMER: EXHIBIT No. ___ (HJR-
 1T)

I Speedishuttle files this Errata to Pre-filed Testimony of H. Jack Roemer: Exhibit No. ___ (HJR-1T) to correct errors discovered in the testimony of H. Jack Roemer filed March 17, 2017, and submits the revised versions of those pages, as described in the following table:

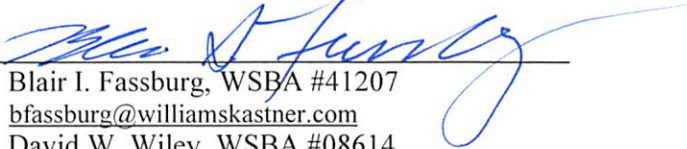
On page 13, line 19	“Marks’s” should be “Marks”
On page 17, line 9	“ <u>and</u> ” should be “and”
On page 18, line 10	“sets” should be “set”
On page 19, line 6	“Mark’s” should be “Marks”
On page 25, line 22	“original” should be “origin”
On page 27, line 25	“Mark’s” should be “Marks”
On page 28, line 9	“Mark’s” should be “Marks”
On page 31, line 22	“Mark’s” should be “Marks”

On page 36, lines 14-15	“review our records I show” should be “review of our records, I show”
On page 39, line 10	“Marks” should be “Marks”
On page 41, line 9	“Shuttle Express’s” should be “Shuttle Express”
On page 45, line 6	“more” should be “less”
On page 50, line 24	“be on” should be “beyond”

DATED this 20th day of March, 2017.

RESPECTFULLY SUBMITTED,

By:


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ERRATA TO PRE-TESTIMONY OF H. JACK ROEMER:
EXHIBIT No. ____ (HJR-1T) - 3

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CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2017, I caused to be served the original and one (1) copy of the foregoing documents and attachments to the following address via US mail:

Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
Attn.: Records Center
P.O. Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

I further certify that I have also provided to the Washington Utilities and Transportation Commission's Secretary an official electronic file containing the foregoing documents and attachments via the WUTC web portal; and served a copy via email and/or first class mail, postage prepaid, to:

Julian Beattie Assistant Attorney General 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	Greg Kopta Director/Administrative Law Judge 1300 S. Evergreen Park Drive SW P.O. Box 47250 Olympia, WA 98504-7250 (360)-664-1355 Email: gkopta@utc.wa.gov
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Dated at Seattle, Washington this 20th day of March, 2017.


Maggi Gruber
Legal Assistant

1 vehicles like Shuttle Express, we would lack the same direct control over vehicle
2 maintenance and there would be always be some lingering questions, at least for us,
3 about the ultimate safety of our passengers.

4 **Q. Mr. Wesley Marks testified in Exhibit No. ___(WAM-1T) at page 7, lines 9-11,**
5 **that “actual experience has shown that the introduction of Mercedes vans did not**
6 **provide service to people who were or would have been unserved simply because**
7 **we use Ford vans.” Isn’t it possible that anyone who could ride in one of**
8 **Speedishuttle’s vehicles could ride in one of Shuttle Express’ Ford vans?**

9 **A.** It is possible, but that does not mean they would affirmatively choose to be transported
10 in one of Shuttle Express’ vans. Rather than riding in a Ford van, those same
11 passengers might select to ride in a nicer vehicle through a TNC like Uber or Lyft.
12 There are numerous options for airport transportation in King County and some
13 customers may prefer the option to ride in a more nicely furnished vehicle but with a
14 door-to-door shared ride service price. Frankly, I don’t know how Mr. Marks or
15 anyone else could testify whether a passenger who chooses to use Speedishuttle’s
16 service *would have* subjectively accepted the alternative of riding in Shuttle Express’s
17 Ford vans. Certainly nothing about market analytics relied upon by Mr. Marks, Mr.
18 Wood and Mr. Kajanoff in their direct testimony could support that answer. Mr.
19 Marks’ testimony also inherently suggests that Shuttle Express is entitled to a
20 monopoly and that anyone seeking shared ride service in King County would and
21 should be satisfied with whatever Shuttle Express chooses to offer. With all of the
22 other existing transportation options, however, I doubt that is true. Speedishuttle’s
23 service is different because we understand that despite continuing regulatory controls of
24 market entry, shared ride services here exist in a dynamic transportation market which
25 this Commission has repeatedly observed. In order to compete, we seek to provide

1 filed, and then immediately improving their own service in response to an application.
2 This would not only stifle innovation but enable the existing carrier to claim a service
3 monopoly without ever having to improve its service until a newcomer files an
4 application, ironically, much like Shuttle Express has tried to do here.

5 **Q. Does Speedishuttle do anything else to appeal to “tech-savvy” customers who
6 might like the idea of reserving a ride through TNC on their mobile device?**

7 A. In addition to providing Wi-Fi, we have released iPhone iOS and Android apps and
8 have been actively promoting them. They are available at
9 <https://itunes.apple.com/us/app/speedishuttle-seattle/id1126837775> and
10 https://play.google.com/store/apps/details?id=com.hudson.speedishuttle_seattle. They
11 permit passengers to make and store reservations on their Apple and Android smart
12 phones. We have also developed and released “Where’s My Vehicle,” providing
13 departing guests with real-time information on their vehicle and driver automatically.
14 The service is free to the guest and is provided automatically if we have either a valid
15 U.S. cell phone number or a valid email address. If we are provided a U.S. mobile
16 phone number for the guest, they will receive an SMS (text) message twenty minutes
17 prior to their scheduled departure pickup. If we do not have a valid telephone number
18 but have an email address, the guest will receive an email. Either includes a customized
19 web link which will open a map that tracks the vehicle’s progress and displays the
20 driver’s name and vehicle description.

21 **SPEEDISHUTTLE TV**

22 **Q. Can you please describe for the Commission what evidence was presented by
23 Speedishuttle about TVs in its application testimony?**

24 A. Here, I am going to quote from the application hearing transcript verbatim. Starting on
25 page 28, line 21 and ending on page 29, line 1, Cecil Morton testified “Our vehicles

1 have interiors that are a little upscale compared to the majority of the industry, and we
2 have Speedishuttle TV, which is an orientation of the marketplace. So when guests
3 arrive, they see a program that has to do with, in this case, it will be Seattle and the
4 wonderful places to visit.”

5 **Q. Can you elaborate some on what Mr. Morton explained?**

6 A. Of course. Speedishuttle features an HD television set in each of its vans. That TV set
7 displays a custom program to provide information about tourist attractions in the Seattle
8 area. You can actually see a photo of the Speedishuttle TV installed in one of our vans
9 in Exhibit No. ___(HJR-9)

10 **Q. Did Speedishuttle propose to offer a luxury television set which can be adjusted by
11 users to display on-air television programming as contended by Mr. Marks?**

12 A. No, it did not.

13 **Q. Do you have any idea of why Mr. Marks would complain that Speedishuttle TV is
14 not exactly that?**

15 A. You would have to ask him, because I do not have any knowledge where he got that
16 idea unless he conflates that concept overall with our luxury vehicle offerings.

17 **Q. Did Speedishuttle install HD television sets in its vans in Washington?**

18 A. Yes, that’s correct.

19 **Q. Is Speedishuttle TV functional in each of those vans?**

20 A. Absolutely it is, and it provides exactly what was described by Mr. Morton in his
21 testimony.

22 **Q. Mr. Marks testified in Exhibit No. ___(WAM-1T), page 8, lines 17-19 that “when
23 [Shuttle Express] asked Speedishuttle if the TV really worked and how many, if
24 any, of their passengers actually watched the TV in operations here, they claimed
25**

1 **to be clueless.” Did Shuttle Express actually ask Speedishuttle in discovery or any**
2 **place else if Speedishuttle TV actually worked?**

3 A. This sounds a lot like how Mr. Marks has tried to twist or modulate Shuttle Express’
4 data requests, and Speedishuttle’s responses, regarding our Wi-Fi service. To be clear,
5 Shuttle Express *never* asked Speedishuttle if Speedishuttle TV actually worked.

6 **Q. Is there any truth to Mr. Marks’ testimony that Shuttle Express asked if *any* of**
7 **Speedishuttle’s passengers actually watched the TV?**

8 A. Absolutely not.

9 **Q. To be clear, what did Shuttle Express ask Speedishuttle regarding Speedishuttle**
10 **TV in discovery?**

11 A. Shuttle Express requested information for every single trip made in Speedishuttle’s
12 history in Washington in Data Request No. 6, and asked within that data for
13 Speedishuttle to provide “...whether they used Wi-Fi or watched TV...” In Data
14 Request No. 8, which I have provided as Exhibit No. ___ (HJR-11), Shuttle Express
15 asked Speedishuttle to “[p]rovide documents that show the vehicles used to transport
16 passengers in the market, including for each vehicle the make, model, year and any
17 amenities such as TVs and Wi-Fi facilities. Provide records that show when such
18 amenities were installed, operated (on/off/disabled, etc.) and used (*e.g.*, Wi-Fi data
19 usage records).”

20 **Q. So did you tell Shuttle Express how many people actually watch Speedishuttle**
21 **TV?**

22 A. We had no way to answer Shuttle Express’ question because there is no realistic way
23 for us to track that information. At the risk of sounding facetious, that’s equivalent to
24 asking us to tell you how many of our customers chew gum. We do not track how
25 many customers watch Speedishuttle TV because we have no business reason to do

1 multilingual and which are merely “unskilled labor,” I don’t much care for Mr. Marks’
2 viewpoint. Speedishuttle has customers from around the world, and we do what we can
3 to hire drivers and greeters with varied language skills in order to accommodate our
4 customers. More importantly, we do not discriminate amongst customers in the way
5 Mr. Marks appears to be suggesting we should. We try our best to serve as many
6 foreign language customers as we can. If Shuttle Express wants to discriminate on the
7 basis of hiring or service of customers, that is their prerogative, but is decidedly not a
8 policy we have or would ever adopt.

9 **Q. Mr. Marks also appears to suggest that Speedishuttle proposed to serve only**
10 **multilingual passengers. Did Speedishuttle ever propose in its application or**
11 **through its application hearing testimony to reserve its service for only**
12 **multilingual passengers, or any other limited subset of the general public?**

13 **A.** We certainly did not. As I discussed earlier, Speedishuttle proposed to provide an
14 upscale shared ride service which would provide additional service features not
15 available from the other providers in the territory for which we applied. The
16 multilingual services we discussed were only one component of those service features.
17 Frankly, I wonder whether Mr. Marks understands that what he portrays our service
18 was supposed to be and how it was to be implemented appears to be illegal. Does he
19 actually propose we use a language and/or a visual test for our passengers to ensure
20 they all speak a foreign language? Should we pick and choose acceptable passengers
21 on that basis? That clearly seems to suggest we discriminate against passengers on the
22 basis of national origin, not to mention violates the basic obligations of a common
23 carrier, and that was certainly not what Speedishuttle ever proposed to provide.
24 Speedishuttle proposed to distinguish its service by its features, and the Commission
25 found those features might well appeal to unserved demographics, but that does not

1 **Q. Mr. Marks also appears to make a big deal about whether particular**
2 **demographics were already served, for example he suggests Speedishuttle hiring**
3 **Spanish speaking drivers doesn't count because it was never identified as an**
4 **unserved demographic and Shuttle Express already served that demographic.**
5 **Exhibit No. ___ (WAM-1T), page 10, lines 10-11. Did Speedishuttle discuss**
6 **providing service to Spanish speaking customers in the application hearing?**

7 A. First, I would like to note that I do not see what difference it makes whether a
8 demographic was already served. Our application was predicated on service feature
9 differentiation and Shuttle Express' failure to serve to the satisfaction of the
10 Commission based on its need for third parties to "rescue" its passengers. But, actually,
11 Cecil Morton did testify about Speedishuttle's efforts to serve Spanish language
12 customers at the application hearing, which I cited earlier. That testimony is located in
13 the application hearing transcript at page 24, lines 8-14.

14 **Q. By the way, did Mr. Marks or anyone else for Shuttle Express testify that they**
15 **already served Spanish speaking customers at the application hearing?**

16 A. No, neither Mr. Marks nor Mr. Kajanoff testified that Shuttle Express provided any
17 multilingual services whatsoever. Here and on many other points, Shuttle Express
18 seems intent on re-litigating our application hearing in this proceeding. If this
19 information would have made a difference, it was available then and it should have
20 been raised at that time.

21 **Q. Mr. Marks also suggests there simply is no need for multilingual services,**
22 **testifying "I'm aware of only two cases of a non-English speaker who required**
23 **assistance in a language other than that spoken by the individual they were**
24 **working with." Exhibit No. ___(WAM-1T), page 13, lines 10-11. Do you have any**
25 **comments on Mr. Marks' testimony in that regard?**

1 A. Assuming Mr. Marks even knows what each and every one of Shuttle Express
2 passengers' language requirements truly are, I think this simply suggests passengers
3 who require multilingual access choose not to use Shuttle Express. Those who do may
4 manage to get by, but that doesn't mean multilingual passengers are being
5 accommodated or would not benefit from additional service features. The willingness
6 to take steps to accommodate those passengers is one of a number of things that set,
7 Speedishuttle's service apart from what Shuttle Express offered, which the Commission
8 appeared to understand and acknowledge when it granted our certificate.

9 **Q. Do you also think Mr. Marks' comment suggests Shuttle Express did not endorse**
10 **the Commission's 2013 Rulemaking?**

11 A. I do. The 2013 auto transportation Rulemaking indicated the UTC wanted auto
12 transportation companies to become more competitive through adaptation to the market
13 and through service innovations. Mr. Marks' comments and Shuttle Express'
14 continuing practices and indeed this current process all suggest to me Shuttle Express
15 wants to ignore those policies so it can keep doing what it has always done. Rather
16 than acknowledge that service improvements may be helpful and responsive to the
17 public, they seem instead to simply demand the protection of a single regulated door-to-
18 door provider in the state's largest population center, despite dramatic regulatory
19 changes in 2013.

20 **DEPARTURE TIMES**

21 **Q. Mr. Roemer, I'd like to turn now to departure times. Did Speedishuttle represent**
22 **at the application hearing that it would offer a 20 minute departure guarantee?**

23 A. That was definitely something which Cecil Morton discussed at the application hearing
24 with respect to Speedishuttle Hawaii, and which we intended to bring to Washington as
25 well.

1 A. It is possible that it is accurate, but he has no way of knowing and neither do we. The
2 data Speedishuttle has available is only for walk up guests and tracks the time from
3 their purchase and actual departure, which is the relevant time period in our departure
4 guarantee in Hawaii. Speedishuttle does not track the time a guest is “ready to go” that
5 Mr. Marks referred to. Further, the information we have available is full of errors and
6 we informed Shuttle Express of that when we produced it to them. Again, Mr. Marks
7 seems bent on a goal here and apparently decided that he would rather offer testimony
8 he viewed as helpful to his cause based on error-filled data than admit that no
9 meaningful testimony could be predicated on the basis of available information.

10 **Q. Can you explain what sorts of errors that data contains and why any conclusions**
11 **drawn from it are not helpful?**

12 A. Most of these issues are caused by the way our dispatch software treats a driver
13 communication for a trip in process. The software sometimes resets (but not always) the
14 onboard time when a driver sends a text to dispatch. We have never found this to be a
15 serious problem since we are tracking wait times for walk up customers as a measure of
16 the effectiveness and efficiency of our dispatch team and not to prove some point for
17 Mr. Marks. We would prefer to have 100% accurate data for internal monitoring, and
18 the data we have now is, in our opinion, satisfactory for our broad performance
19 monitoring for walk up reservations. But it simply cannot be relied upon to reach any
20 absolute conclusions about our overall aggregate departure times. Therefore, any
21 conclusion based on them is just a guess.

22 **Q. But don't Mr. Marks' statements about Speedishuttle departure times actually**
23 **show that you meet your goal most of the time?**

1 A. I am, because, Mr. DeLeo sent an email which was forwarded to Speedishuttle about it.

2 **Q. Was his testimony accurate?**

3 A. No.

4 **Q. Please describe in what ways his testimony was inaccurate.**

5 A. Mr. DeLeo's testimony stated that Speedishuttle had just two greeters for 70 passengers
6 at 16 baggage carousels when he investigated. Exhibit No. ___(JD-1T), page 3, lines
7 12-13. But when he prepared an email outlining his "investigation" on May 28, 2016,
8 he told us there were 3 greeters for 30-40 reservations over a few hours. Exhibit No.
9 ___(HJR-15). He also failed to mention that SMS had just three flights arriving. AS-
10 637 (Alaska) at 10:55, with three passengers, BA 53 (British Airways) at 11:20 with
11 two passengers, and DL 2784 (Delta) at 11:57 a.m. with two passengers.

12 **Q. In your opinion, was Speedishuttle's staffing of greeters appropriate based upon**
13 **the number of incoming flights?**

14 A. I have not done a thorough analysis of the timing of arrivals, but based on my review of
15 our records, I show we had 31 flights to greet in the three hours from 9:00 a.m. to noon
16 that day. That's 10 flights per hour with three greeters each handling roughly 3 flights
17 per hour. I think that sounds perfectly reasonable.

18 **Q. But on the day Mr. DeLeo investigated, didn't his staff end up greeting a majority**
19 **of their guests?**

20 A. No. He said there was one flight where they could not find the greeter. That flight (BA
21 53 at 11:20) had 3 guests out of 7 passengers for SMS that day.

22 **Q. Did Mr. DeLeo ever complain about the professionalism or dress of**
23 **Speedishuttle's greeters in his email?**

24 A. No, in fact he mentioned Candy Jesse was friendly in his email but had nothing else to
25 say about it at the time.

1 A. Absolutely it did. We felt like everything we did was above board and with good
2 intentions and we had no idea why walk-up later became an issue despite our original
3 assumption that the agreement between the Port and Shuttle Express would preclude
4 that service. We thus viewed walk-up as a more complete service offering.

5 **VI. MARKET ANALYTICS**

6 **Q. Mr. Roemer, I'd like to ask you a few questions about Speedishuttle's business**
7 **model, as discussed by the witnesses for Shuttle Express, in the context of their**
8 **market analysis.**

9 A. Ok.

10 **Q. Have you had an opportunity to review Mr. Marks comments in Exhibit No.**
11 **__(WAM-1T) on page 11?**

12 A. I have.

13 **Q. Mr. Marks testified at page 11 of Exhibit No. __(WAM-1T) "[w]e know from**
14 **over a year of experience that Speedishuttle is not really carrying unserved**
15 **Chinese, Japanese, and Korean passengers in any meaningful numbers. First, had**
16 **that happened, we would have seen an increase in the total number of shared ride**
17 **passengers, or at least a slowing down of the downward trend. That did not**
18 **happen." Do you have any reactions to this testimony?**

19 A. First, again, neither Speedishuttle nor the Commission ever said Speedishuttle was
20 going to serve only Chinese, Japanese or Korean passengers, so I truly don't understand
21 the context of this comment at all. Additionally, that statement makes several
22 assumptions that are not supported by evidence. For example, what was the overall
23 market trend? How many passengers chose alternative services? What were the
24 language demographics of those passengers? He would need to answer all of those
25

1 do something more than point to us using the same wholesaler to establish that the same
2 customers who *would or could have* used Shuttle Express are now using Speedishuttle.

3 **Q. Is this even “new evidence,” as Shuttle Express claimed this rehearing was**
4 **founded upon?**

5 A. Not at all. In fact, Mr. Marks made Go Group a significant point of discussion at the
6 application hearing, claiming it was a critical issue. Mr. Marks well understood that Go
7 Group’s support of Speedishuttle’s application meant that Shuttle Express would likely
8 lose bookings from the Go Group when he raised that challenge at the time. Again,
9 Shuttle Express’ testimony here and in other areas continually demonstrates that they
10 believe they are entitled to a service monopoly under the law and should not be
11 required to compete, or be required or expected to improve or innovate.

12 **Q. Does that same critique apply to Mr. Marks’ testimony in Exhibit No. ___(WAM-**
13 **1T) at page 20, lines 1- page 21, line 2.**

14 A. Absolutely it does. Rather than innovate, or even supply new evidence not available at
15 the application hearing, Mr. Marks is implicitly asking the Commission to reject its
16 ruling in 04 based on Shuttle Express’ long-standing service to hotels and piers. What
17 Mr. Marks fails to acknowledge is that Speedishuttle provides additional service,
18 beyond mere transportation, to enhance our passengers’ visits to Washington.

19 **Q. Do you have any other comments on Mr. Marks’ testimony?**

20 A. I do. In Exhibit No. ___(WAM-1T) at page 19, lines 8-16, Mr. Marks claims that
21 Speedishuttle’s use of a kiosk demonstrates that Speedishuttle’s service is the same as
22 Shuttle Express. In that vein, I suppose Mr. Marks would also testify that
23 Speedishuttle’s use of tires on our vehicles demonstrates we are the same service as
24 Shuttle Express. The use of a kiosk may be similar to what Shuttle Express does, but
25

1 **Q. In those Hawaiian markets are there in fact more than two providers at every**
2 **airport?**

3 A. Yes, there are and they are considerably smaller airports in terms of passengers.

4 **Q. How long has Speedishuttle Hawaii operated under those circumstances?**

5 A. We have had multiple providers at every airport for the last 19 years and in fact have
6 never operated in Hawaii without less than one competitor, many of whose tenure
7 exceeds our own.

8 **Q. Has Mr. Wood done anything to demonstrate why Seattle is somehow different**
9 **than these airports which apparently can support multiple providers?**

10 A. No, he has not. In fact, he tried to support his argument by doing little more than
11 claiming that nothing had disproven his conclusions! Rather than supporting his
12 argument by analysis and facts, he supports it by arguing he is not aware of any
13 evidence to support a conclusion that he is wrong. Exhibit No. ___(DJW-1T), page 29.

14 **Q. Is this argument on sustainability a new issue raised to the Commission for the**
15 **first time in this rehearing?**

16 A. No, it is not. Paul Kajanoff testified that he believed there was a problem with
17 permitting too many shared ride operators in a given area at the application hearing.
18 His testimony is in the transcript at page 115, line 19 to page 116, line 7.

19 **Q. Is Speedishuttle doing anything to avoid serving segments of the market, as**
20 **suggested by Mr. Wood (Exhibit No. ___(DJW-1T), page 30) and Mr. Kajanoff?**

21 A. Absolutely not. Speedishuttle's fares are public record. If Mr. Wood (or Mr. Kajanoff)
22 think we are actively attempting to avoid serving a market segment, rather than pointing
23 to hypothetical ways a provider might do that and then basing conclusions on
24 hypotheticals without foundation, Mr. Wood could have done a simple analysis of our
25 fares. Take North Bend for example – a zip code which Shuttle Express does not fully

1 **Q. Now if you did have some large costs lumped together at once, like in your Super**
2 **Bowl ad example, so that your revenues in a year were well below your costs for**
3 **the year, wouldn't that harm Shuttle Express?**

4 A. I don't see how that could be true. Passengers have choices for transportation and the
5 factors which would likely weigh into that customer's consideration would be service
6 and price. While I understand that there are regulatory rules used for determining fares,
7 a provider's cost cannot truly affect price in a competitive market because we can never
8 charge more than the market supports, and what the UTC authorizes, for our service.
9 Thus, the only important comparison should be between the incremental cost of service
10 (i.e., the average variable cost) and the fare charged for that service by each company.

11 **Q. By the way, is it true that Speedishuttle intended to begin its operations with only**
12 **five vehicles?**

13 A. That was the initial plan. At the time that plan was made of course we were not certain
14 how quickly we would develop our clientele in Washington.

15 **Q. Was it always part of Speedishuttle's plan to grow its business in Washington?**

16 A. Indeed it was. If you review Cecil Morton's testimony in the application hearing
17 transcript at page 46 lines 1-6, you will see that he testified: "[i]f we find that the
18 demand is greater than our capacity, we will acquire new equipment. We will not be
19 starting the business within days of obtaining our authority. We will be reaching out to
20 all our clientele and we will adjust our in [sic]- commencement fleet accordingly."
21 Thus, Speedishuttle always intended to acquire additional vehicles as demand
22 warranted.

23 **Q. Did the demand for Speedishuttle service require that you acquire additional**
24 **vehicles beyond the initially proposed five?**