

DATE PREPARED: April 3, 2017
DOCKET: TC-143691, TC-160516
REQUESTER: Shuttle Express, Inc.

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

Data Request No. 71:

Regarding Mr. Roemer's testimony at page 36 that SpeediShuttle's greeter staffing is appropriate, please provide duty rosters or sufficient data to show scheduling and hours of staffing, numbers of greeters by shifts/days of week/or other period, languages of the assigned staff, and actual or projected number of flights and passengers to be greeted during each period.

RESPONSE to Data Request No. 71:

Speedishuttle again objects that this request seeks information which is irrelevant to the scope of this proceeding and the discovery permitted herein as defined by the Administrative Law Judge at a hearing on September 27, 2016. Specifically, this request does not seek or lead to information which can assist the Commission in determining whether Speedishuttle is providing greeters or "doing its best" to provide multilingual greeters. This inquiry instead appears to seek information that would critique qualitative factors regarding the staffing of greeters and not whether "multilingual receptive teams" have been provided. Further, the information is either unavailable or unduly burdensome to locate and produce. The issue raised by Mr. Roemer was addressing a specific claim made by Mr. DeLeo for a specific date and time, not a generalized discussion of all times and all dates for greeters, and Mr. Roemer, in addressing greeter numbers only responded to the specific incidents raised by Mr. DeLeo. Thus, Mr. Roemer's specific denial of Mr. DeLeo's allegation once again does not "open the door" to invasive discovery to bolster responsive testimony by Shuttle Express which does not rebut Mr. Roemer's specific testimony (and is thus out of sequence).