



October 21, 2019

Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
Olympia, WA 98504-7250

**SUBJECT: Freedom 2000, LLC Compliance Review**  
**Docket TG-180782**

Dear Commissioners:

Thank you for your consideration of the compliance review conducted as recommended in 2018 for Docket TG-180782 Freedom 2000, LLC Tariff Revision regarding provision of solid waste collection services in Point Roberts, WA. In support of the compliance review, Whatcom County Solid Waste Program staff accompanied WUTC staff to Point Roberts on September 4, 2019 during their site visit.

As reflected in the proceedings, the purpose of the compliance review was to evaluate established rates and current implementation progress for new program requirements consisting of mandatory curbside collection, at a minimum level of service, with accommodation for seasonal residents, at rates approved by WUTC and as collected on the customer annual property tax bill. The goals of the new program requirements were to necessarily increase viability of service provision, in an area with unique challenges, while supporting higher levels of service, at cost effective rates, and reducing illegal dumping.

It is our assessment that, due to high levels of community engagement and service provider effort, implementation is proceeding very well. The increase in customer base from 300 to 1,910 has resulted in a modicum of economy of scale, significantly increased viability of service provision, and reduced the probability of a repeat occurrence of the experienced 2010 loss of service. Instead, a contemporary new customer web site, state-of-the-art vehicle routing and accounting system software, and on-board vehicle tablet computers to implement the seasonal resident 'variable option' have been procured; a very necessary investment in new, albeit used, equipment such as solid waste and recyclable materials collection vehicles, commercial dumpsters, compactor, baler, and recycling totes has been made possible and completed.

The minimum level of service, combined with the variable option and every other month customer statements, appears to have been well embraced; the approved rates are competitive, and acceptance of the payment of the fee for service on the annual property tax bill is rated as high. Residential use of commercial dumpsters is apparently reduced, and the local Adopt-A-Road group reports a significant reduction in illegal dumping. Additionally, the service provider is currently in consideration of committing to becoming one of a dozen national operations to enter into a year-long pilot program to include plastic film as a recyclable material collected curbside.

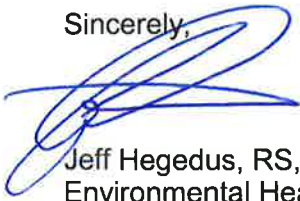


At the same time, we assess that the new program is still in the early phase of implementation, and that additional time will be necessary to fully evaluate and quantify results. For this reason, we appreciate and support the WUTC compliance review also scheduled for 2020, and will look forward to further insight.

To conclude, we are very pleased with the status of the current work to create a viable, stable, effective and affordable solid waste collection system in Point Roberts, and applaud the community and the service provider for their engaged process and efforts.

Thank you for your consideration of this compliance review, and for the time, effort and expertise of Commission staff to improve solid waste collection services in Whatcom County.

Sincerely,



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Environmental Health Supervisor/  
Solid Waste Program Manager