DATE PREPARED: August 31, 2016 DOCKET: TC-143691, TC-160516 REQUESTER: Shuttle Express, Inc. WITNESS:JaRESPONDER:JaTELEPHONE:(2)

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Data Request No. 10:

Describe in detail every aspect of Speedishuttle's service in the market that you would contend is in a material way different from the door-to-door share-ride van service offered by Shuttle Express.

RESPONSE to Data Request No. 10:

Speedishuttle objects that this request is overly broad and unduly burdensome in that it purports to require Speedishuttle to "[d]escribe in detail every aspect of Speedishuttle's service..." Speedishuttle further objects that this information is available from sources equally available to complainant, and with far less burden or expense. It also objects that this question is vague, ambiguous and irrelevant with respect to "…service offered by Shuttle Express" as to time period.

Subject to and without waiving the foregoing objections, Speedishuttle states, according to Final Order 4, "the totality of these features demonstrate that the proposed service uniquely targets a specific subset of consumers seeking door-to-door service to and from the airport: those who are tourists, tech-savvy, or non-English speaking. Speedishuttle's business model thus includes luxury vehicles, significantly increased accessibility for non-English speaking customers, individually-tailored customer service, tourism information, and Wi-Fi service. Such service is substantially different from the existing service the objecting carriers offer."

Speedishuttle has endeavored to offer exactly that: individually-tailored customer services to include complimentary airport greeting for prearranged arrivals and departure confirmation calls, multilingual booking options, Wi-Fi service, luxury vehicles, tourism information and Speedishuttle TV in areas, as the Commission expressly found, which differentiated itself from Shuttle Express during the applicable test year prior to the filing of its Application in October, 2014.

Finally, Speedishuttle lacks knowledge of all details of the door-to-door shared ride van service operated by Shuttle Express although, on information and belief, avers that that service is not presently available in all areas in Shuttle Express King County territory, including, but not limited to major hotels in Seattle and Bellevue that are currently served only by Shuttle Express on a scheduled, routed service basis.