

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUESTS

Exh HJR-69-X

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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. 18:

Please describe all efforts to serve passengers in the market that were not being served or could not be served by Shuttle Express prior to your UTC application and provide documents that reflect, show, or relate to any such efforts.

RESPONSE to Data Request No. 18:

Objection, this request is vague and incomprehensible as to timing as to whether it pertains to the applicable test period or for how many years prior to the application. It also assumes that the 2013 Rulemaking's policy statement and new rules implementation had no bearing on a prospective applicant's motivation in seeking certificate authority. Speedishuttle further objects that this request is overbroad and unduly burdensome. For example, without waiving its objections, Speedishuttle directs the Complainant's attention to the testimony of January 12, 2015 on the Go Group and the correspondence exhibit from the Go Group admitted into the hearing record as to the discontinuance by Shuttle Express of the wholesale travel service provider in Washington. Subject to and without waiving the foregoing objections, see responses to Request Nos. 6, 8, and 10, above. And once again, the findings of the Commission on the service record are a matter of law as found in Order 04 and as argued in the pending Petition for Administrative Review of Order 06.

Without waiving the foregoing objections, Speedishuttle also notes the current service limitations of Shuttle Express it understands as noted in previous Data Request Responses Nos. 10-12, above.