

**RESPONDENT SPEEDISHUTTLE'S SUPPLEMENTAL RESPONSES TO
SECOND DATA REQUESTS OF SHUTTLE EXPRESS, INC.** Exh HJR-70-X
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DATE PREPARED: November 18, 2016	WITNESS: Jack Roemer
DOCKET: TC-143691, TC-160516	RESPONDER: Jack Roemer
REQUESTER: Shuttle Express, Inc.	TELEPHONE: (206) 233-2895

Data Request No. 28:

Do you admit that Speedishuttle as of today is operating a “walk-up service, or on-demand service” comparable to “what Shuttle Express operates at the airport” (interpreted consistent with the testimony at Transcript, p. 48, Dkt. TC-143691)?

RESPONSE TO DR 28:

Objection, not relevant in the discovery sense to the issues considered to be remaining in the Complaint or Petition action and not reasonably calculated to lead to the discovery of admissible evidence to the two issues in this proceeding. Moreover, comparable to what Shuttle Express operates at the airport is overbroad, vague and subjective. This question further seeks to reopen legal issues decided by the Notice of Determination not to Amend Order 04, dated December 14, 2015, Dkt. TC-143691, which the Commission also ruled in Order 06 is not subject to collateral attack on rehearing. Without waiving its objections, Speedishuttle denies this request but admits that it is operating as a regulated auto transportation company pursuant to RCW 81.68.040 and a charter party carrier under RCW 81.70 as does Shuttle Express.

SUPPLEMENTAL RESPONSE TO DR 28:

Speedishuttle incorporates its objections in its prior Response to DR 28, and does not waive them. It amends its last sentence to read: “Speedishuttle admits that it is operating as a regulated auto transportation company pursuant to RCW 81.68.040 and a charter party carrier under RCW 81.70 which includes walk-up service defined at WAC 480-30-036 as the Commission also confirmed in its December 14, 2015 determination.”

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2016, I caused to be served a copy of Speedishuttle Washington, LLC's Supplemental Responses to Second Data Requests of Shuttle Express to the following at the below addresses via email and/or first class mail:

Julian Beattie 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	Brooks Harlow Lukas, Nace, Gutierrez & Sachs, LLP 8300 Greensboro Dr. Suite 1200 McLean, VA 22102 (703) 584-8680 Email: bharlow@fcclaw.com
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Signed at Seattle, Washington this 18th day of November, 2016.


Maggi Gruber
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