

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

SHUTTLE EXPRESS, INC.,

Petitioner and Complainant,

v.

SPEEDI SHUTTLE WASHINGTON, LLC

Respondent.

DOCKET NOS.

TC-143691

TC-160516

RECEIVED

AUG 29 2016

WILLIAMS KASTNER LLP

FIRST DATA REQUESTS OF
SHUTTLE EXPRESS, INC. TO
SPEEDI SHUTTLE WASHINGTON,
LLC

TO: Respondent SpeediShuttle Washington, LLC

INTRODUCTION

Please respond to the following data requests in accordance with WAC 480-07-400, *et seq.*

Unless otherwise stated, the time period covered by the following requests is January 1, 2013 to the date of your response. If any response changes, including updated or additional responsive documents or information, please update the response to the date of the hearing.

“Market” means transportation and related services and facilities in or between the SeaTac airport and points in King County, Washington.

“Document” or “record” includes both paper and electronic records and files in their native format, including all metadata. For any file formats that are not readable with mass market software (such as Excel, Word, Outlook, Acrobat), please also provide or offer to provide in a file format commonly readable (such as Adobe Acrobat portable document format).

DATA REQUESTS

1. Provide a list of each current or past employee of SS who works in or serves the market, whether full time or part time. For each employee, provide the following information, if known: name, age, place or places worked, job title, employer, job description, nationality, and languages spoken, read or written.
2. Provide copies of all emails between or among SS personnel and/or third parties that address or relate to the availability or provision of services to passengers or potential in the market who do not speak or do not read and write English or who are tech-savvy.
3. Provide copies of all documents that reflect, show, or related to hiring or engagement of employees or contractors to serve the market, including advertisements, qualifications, hiring manuals, employment manuals, questionnaires, interview questions, evaluation forms, and decision records or notices.
4. Provide all records that show online inquiries or bookings in the market and what language was used by the passenger or prospective passenger to make the inquiry or booking.
5. Provide all records that reflect, show, or relate to airport greeters at SeaTac, including duty rosters, schedules, time records, passenger meet/greet lists, locations, languages spoken and numbers of passengers served—by language or nationality, if known.

6. Please provide statistical data for each reservation or trip to or from Sea Tac Airport including, but not limited to, Hudson date/time stamps for reservation time of day, ready to go time of day, on board time of day, location and drop off time of day served in the market to or from SeaTac Airport, how they reserved the transportation (*e.g.*, phone, computer, smartphone, in person, language used), the fare(s) paid, whether or not they spoke English, whether they used Wi-Fi or watched TV, the number of passengers carried in each vehicle on the same trip, the number of stops per trip, the time for each trip, and Hudson system fields for TripID and ShiftID.
7. Please provide all documents that show or relate to the time elapsed that passengers departing SeaTac Airport waited from their check in or presentment with SS until the departure of the vehicle from the loading area, including statistical data, emails, memoranda, “guarantees” or other representations to passengers, or complaints.
8. Provide documents that show the vehicles used to transport passengers in the market, including, for each vehicle, the make, model, year, and any amenities, such as TVs and Wi-Fi facilities. Provide records that show when such amenities were installed, operated (on/off/disabled, etc.) and used (*e.g.* Wi-Fi data usage records).
9. Provide documents that reflect, show, or relate to a decision or practice to carry “walk-up” or not “pre-arranged” passengers or the like (by whatever terminology or nomenclature), in the market.
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.

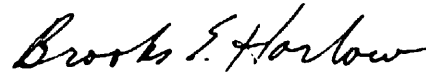
11. Describe in detail every aspect of Speedishuttle's service in the market that you would contend is in a material way the same as or similar to the door-to-door share-ride van service offered by Shuttle Express.
12. Provide all documents that reflect, show, or relate to an attempt by Speedishuttle to compete with Shuttle Express or to carry passengers that could instead take Shuttle Express, including advertising, communications with the Port of Seattle, or communications with trade associations or travel groups.
13. Provide all documents that reflect, show, or relate to efforts by Speedishuttle to attract non-English speaking passengers in the market, or in Hawaii, including websites, advertising, or outreach to trade associations or travel groups.
14. Provide documents that reflect, show, or relate to loans or capital investments to Respondent by shareholders, financial institutions, corporate affiliates, or third parties, including the amounts, dates, terms, and any related documents, such as applications, agreements, bank statements, demands, repayments, reports, extensions, renewals, guarantees, or security interests.
15. Provide financial statements of the Respondent, by month, on the following bases: consolidated with corporate affiliates, separate, or both, if available. Provide any audit documents, if available.
16. Provide all business plans, projections, cash flow analyses, profitability analyses, and other documents that reflect, show, or relate to the Respondent's profitability, lack of profitability, or plans or expectations to become profitable.
17. Describe efforts to attract or target tech-savvy or non-English speaking passengers in the market and provide any documents that reflect, show, or relate to such efforts.

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.
19. Provide copies of all agreements with airlines, Go Group, and Hudson Group for or relating to ground transportation in the market.
20. Provide copies of all reports provided to or prepared for the UTC, the Port of Seattle, Go Group, and Hudson Group.
21. Provide analyses of air and/or ground transportation in, to, or from the market, including demand, needs, existing providers, and any drafts or plans to enter the market or obtain operating authority. The scope of this request is January 1, 2012 to the date of hearing in this matter.
22. Provide copies of all correspondence to or from the Go Group. The scope of this request is January 1, 2012 to the date of hearing in this matter. This request encompasses all forms of correspondence, including paper, emails, or text messages. It is intended to include aggregate reservation or transportation data, but is not intended to include all specific or individual reservations, bookings, or requests for ground transportation.
23. Provide copies of all correspondence to or from the Hudson Group. The scope of this request is January 1, 2012 to the date of hearing in this matter. This request encompasses all forms of correspondence, including paper, emails, or text messages. It is intended to

include aggregate reservation or transportation data, but is not intended to include all specific or individual reservations, bookings, or requests for ground transportation.

Submitted this 17th day of August, 2016.

LUKAS, NACE, GUTIERREZ & SACHS, LLP



Brooks E. Harlow, WSBA 11843
Counsel for Shuttle Express, Inc.

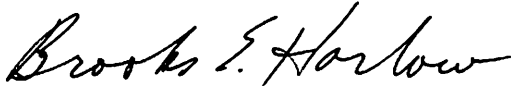
8300 Greensboro Dr. Suite 1200
McLean, VA 22102
Phone: 703-584-8680
Fax: 703-584-8696
bharlow@fcclaw.com

CERTIFICATE OF SERVICE

I hereby certify that on August 17th, 2016 and August 24th, 2016, I served a copy the foregoing document via email, with a copy via first class mail (August 24, 2016 only), postage prepaid, to:

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	David W. Wiley Williams Kastner Two Union Square 601 Union Street, Suite 4100 Seattle, WA 98101 206-233-2895 Email: dwiley@williamskastner.com
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Dated at McLean, Virginia this August 24th, 2016.



Brooks E. Harlow