

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

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

TO: Respondent SpeediShuttle Washington, LLC (“Speedishuttle”)

**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**

24. Do you admit that Speedishuttle as of today is not operating a service “with [a] different character” (interpreted consistent with the statement at Transcript, p. 142, Dkt. TC-143691) than the current Shuttle Express door-to-door share ride service?
25. If your response to the prior data request is anything other than a full and unequivocal admission, please identify which aspects of the request you admit, which aspects you deny, and your reasons for the denial or partial denial.
26. Do you admit that as of January 12, 2015, if granted the auto transportation certificate it sought, Speedishuttle did not intend to operate a service “with [a] different character” (interpreted consistent with the statement at Transcript, p. 142, Dkt. TC-143691) than the Shuttle Express door-to-door share ride service?
27. If your response to the prior data request is anything other than a full and unequivocal admission, please identify which aspects of the request you admit, which aspects you deny, and your reasons for the denial or partial denial.
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)?

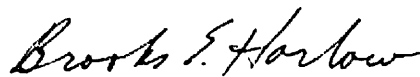
29. If your response to the prior data request is anything other than a full and unequivocal admission, please identify which aspects of the request you admit, which aspects you deny, and your reasons for the denial or partial denial.
30. Do you admit that as of January 12, 2015, Speedishuttle, if granted the auto transportation certificate it sought, intended to offer 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)?
31. If your response to the prior data request is anything other than a full and unequivocal admission, please identify which aspects of the request you admit, which aspects you deny, and your reasons for the denial or partial denial.
32. Do you admit that the majority of passengers that Speedishuttle currently transports to and from SeaTac Airport under its door-to-door auto transportation certificate could be transported by Shuttle Express if Speedishuttle were not offering service?
33. If your response to the prior data request is anything other than a full and unequivocal admission, please identify which aspects of the request you admit, which aspects you deny, and your reasons for the denial or partial denial.
34. Do you admit that as of January 12, 2015, Speedishuttle expected or believed that the majority of passengers it would transport to and from SeaTac Airport, if granted the auto transportation certificate it sought, would be passengers that could have been transported by Shuttle Express if Speedishuttle were not permitted to offer the service?
35. If your response to the prior data request is anything other than a full and unequivocal admission, please identify which aspects of the request you admit, which aspects you deny, and your reasons for the denial or partial denial.

36. Do you admit that as of January 12, 2015, Speedishuttle did not intend that the services described as “innovative and unique services in filling a niche” (interpreted consistent with the statement at Transcript, p. 142, Dkt. TC-143691) would constitute the majority of services it would provide (by relative numbers of passengers), if it were granted the auto transportation certificate it sought?
37. If your response to the prior data request is anything other than a full and unequivocal admission, please identify which aspects of the request you admit, which aspects you deny, and your reasons for the denial or partial denial.
38. Do you admit that Speedishuttle does not, for all passengers, depart SeaTac airport within 20 minutes from the time a passenger has their bags and is ready to go?
39. If your response to the prior data request is anything other than a full and unequivocal admission, please identify which aspects of the request you admit, which aspects you deny, and your reasons for the denial or partial denial.
40. Do you admit that Speedishuttle does not, on average, depart SeaTac airport within 20 minutes from the time passengers have their bags and are ready to go?
41. If your response to the prior data request is anything other than a full and unequivocal admission, please identify which aspects of the request you admit, which aspects you deny, and your reasons for the denial or partial denial.

42. Please provide any documents supporting your answers to Data Request Nos. 25, 27, 29, 31, 33, 35, 37, 39 and 41.

Submitted this 1st day of November, 2016.

LUKAS, NACE, GUTIERREZ & SACHS, LLP



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**CERTIFICATE OF SERVICE**

I hereby certify that on November 1, 2016 I served a copy of the foregoing document via email, with a copy via first class mail, 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 1<sup>st</sup> of November, 2016.



Elisheva Simon  
Legal Assistant