

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In re Application of

DOLLY, INC.

For a Permit to Operate as a Motor Carrier of
Household Goods and a Permit to Operate
as a Motor Freight Common Carrier

Docket No: TV-180605

PREFILED DIRECT TESTIMONY OF

Rachel Lazar

**PRINCIPAL
LAZAR MARKETING**

November 30, 2018

1 **I. IDENTIFICATION OF WITNESS**

2 **Q. Please state your name and business address.**

3 A. Rachel Lazar, 3446 38th Ave SW, Seattle, WA 98126

4
5 **Q. By whom are you employed and in what capacity?**

6 A. Self employed – Principal of Lazar Marketing Consulting

7
8 **Q. Are you sponsoring any exhibits with your testimony?**

9 A. No.

10
11 **Q. On whose behalf are you testifying?**

12 A. Dolly.

13
14 **Q. Please describe your educational background and relevant professional experience.**

15 A. Bachelor of Science in Psychology & Communications. I have worked in digital
16 marketing since 1998, running some of the earliest digital marketing efforts at
17 Amazon.com including the launch of the Toys Store, Electronics Store, and Target
18 partnership. I served on the Commission Junction Advisory Council, have spoken on
19 various marketing panels, and have been a marketing Advisor to numerous startups.

20
21 **Q. What experience do you have with Internet advertising?**

1 A. I have been running digital marketing campaigns since their inception at companies such
2 as Amazon.com, RealNetworks, and DoubleDown Interactive. My team manages
3 campaigns across nearly all digital marketing channels for clients large and small.
4

5 **Q. Have you previously filed testimony with the Washington Utilities and**
6 **Transportation Commission?**

7 A. No.
8

9 **Q. Was your testimony prepared by you or under your instruction and supervision?**

10 A. Yes.
11

12 **Q. What is the scope of your testimony?**

13 A. The purpose of my testimony is to describe and explain the importance and complexity of
14 Internet advertising to the WUTC Commissioners. My testimony is limited to describing
15 the different way companies advertise on the Internet. Beyond that I will discuss the
16 most popular advertising mediums, their capabilities and limitations.
17

18 **II. SUMMARY OF TESTIMONY**

19 **Q. Please summarize your major findings.**

20 A. Internet marketing is one of the easiest and most efficient means for almost all businesses
21 to acquire customers and has become the backbone of American commerce. Internet
22 marketing makes it possible for a business to reach customers or potential customers
23 everywhere the Internet is available, regardless of the business' physical location. This is

1 because the Internet is available in every corner of the globe that is wired or can receive a
2 satellite transmission and is not actively blocked by governmental agencies.

3 The service Dolly advertises to people on their website (www.dolly.com) and other sites
4 such as Facebook, Twitter, and Yelp is unrelated to whether Dolly, in fact, provides it
5 where the person is located. This means it is impossible for Dolly to limit who, how,
6 where, or when a person can access those websites. Which of course means that if Dolly
7 were to stop marketing in a physically discrete location, it would effectively stop
8 marketing in all places the Internet is available, which as stated above, is essentially
9 everywhere the Internet is available.

11 III. INTERNET MARKETING

12 **Q. What are the different ways that companies advertise using the Internet?**

13 A. Some of the most popular Internet marketing tactics are, the company's proprietary
14 website, Search engine marketing ("SEM"), Search engine optimization ("SEO"), Local
15 search engine optimization ("LSEO"), Social media marketing, Email marketing,
16 Referral marketing, Content marketing, Native advertising, Display advertising,
17 Contextual advertising, Behavioral targeting, Affiliate marketing, and Mobile advertising.

18
19 **Q. Why does Dolly use a website and social media pages?**

20 A. I assume it is because Dolly wants to acquire customers and inform them about why they
21 should use Dolly instead of another company. A company's proprietary website and
22 social media presence is a very cost effective way to reach and inform customers about

1 their service offering as well as read reviews from others who have experience with said
2 company.

3
4 **Q. What are the most popular ways companies use to advertise on the Internet?**

5 A. The most popular ways are the company's website and using their own proprietary
6 customer lists to email current customers. However, search engine marketing ("SEM")
7 and social media are usually where most businesses spend advertising dollars to acquire
8 new customers.

9
10 **Q. Please describe SEO and how it works?**

11 A. Search engine optimization ("SEO") is the practice of increasing the quantity and quality
12 of traffic to a company's website. This is usually done by creating and placing content on
13 a website that will show up in organic (i.e. not paid for) search engine results. The
14 content a company puts on their website and social media pages dictate when and where
15 a company's page will show up in search engine results. Companies want their pages to
16 show up near the top of the search results page to acquire customers who are looking for
17 services the company offers. This is called search engine optimization ("SEO").

18
19 **Q. Please describe social media and how it works?**

20 A. Social media marketing is the use of social media platforms and websites to promote a
21 product or service. Although the terms e-marketing and digital marketing are still
22 dominant in academia, social media marketing is becoming more popular for both
23 practitioners and researchers.

1

2 **Q. Can a company limit the reach of its social media websites or its own website to a**
3 **geographically discreet region or market?**

4 A. No. As I stated above, it is not possible for a company to exclude a specific region or
5 jurisdiction from accessing its website or social media channels if Internet is available.

6 One would have to eliminate the entire telecommunications infrastructure to achieve that.

7

8

IV. CONCLUSION

9 **Q. Does this conclude your testimony?**

10 A. Yes.