



K&L GATES LLP
925 FOURTH AVENUE
SUITE 2900,
SEATTLE, WA 98104-1158
T +1 206 623 7580 F +1 206 623 7022 klgates.com

October 30, 2014

Kari Vander Stoep
kari.vanderstoep@klgates.com
206-370-7804

Via Email

Megan Banks
Compliance Investigator
Consumer Protection and Communications
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250
mbanks@utc.wa.gov

Re: *In re Campus Bellhops LLC* -- Docket TV-143185

Dear Ms. Banks:

K&L Gates LLP represents Campus Bellhops LLC and its principals Cameron Doody, Adam Haney, Matt Patterson, and Stephen Vlahos. Pursuant to my conversations with ALJ Rayne Pearson and you the week of October 20, 2014, I will be attending the hearing on November 4 on behalf of Campus Bellhops and its principals.

Enclosed are the documents responsive to the Subpoena Duces Tecum for Production of Documents, which was served on Campus Bellhops on approximately September 24, 2014. Campus Bellhops is a labor-only business in Washington state. It has ceased offering to help with arrangements for moving trucks as part of its business activities. The enclosed Declaration of Cameron Doody and Exhibits 1 - 7 demonstrate that Campus Bellhops is a labor-only company.

The WUTC alleges that Campus Bellhops is in violation of RCW 81.80.075(1), which states that "No person shall engage in business as a household goods carrier without first obtaining a household goods carrier permit from the commission." Campus Bellhops is no longer in violation of this statute because "'Household goods carrier' means a person who transports for compensation, by motor vehicle within this state, or who advertises, solicits, offers, or enters into an agreement to transport household goods as defined by the commission." RCW 81.80.010(5). Campus Bellhops is a labor-only company that does not transport or advertise, solicit, offer, or enter into agreements to transport household goods by motor vehicle. Because Campus Bellhops is a labor-only company, we believe it falls outside the WUTC's jurisdiction. *See also* WAC 480-15-181 ("A company's operations do not require a permit from the commission when the company: ... (4) Uses a truck the customer owns or rents, even if the company does the packing and loading. (5) Packs and loads the goods but does not transport the belongings.").

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Campus Bellhops looks forward to working with you to resolve this matter.

Yours truly,

A handwritten signature in black ink, appearing to read "Kari Vander Stoep". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Kari Vander Stoep

cc: Cameron Doody
Enclosures