



April 15, 2020

Washington Utilities and Transportation Commission
Post Office Box 47250
Olympia, Washington 98504-7250

Re: UTC Docket 200348

Received
Records Management
04/16/20 08:59
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

To Whom It May Concern:

My name is Diane DeAutremont and I am the President and an owner of Lile International Companies which has three Washington locations, Kent, Lakewood and Vancouver, from which we perform regulated household goods moving under WUTC Permit # HG12233. I am writing in response to the above petition asking for a declaratory order requested by the Washington Movers Conference (WMC) to determine if it is allowable within UTC WACs that a HHG moving company legally contract out moving services to a third party. WMC's request relates specifically to an App-Based Micro Mover, but even more generally we are interested in the answer to this question because we have been told by the UTC on multiple occasions that holders of HHG permits may not utilize third parties or independent contractors in performance of regulated HHG moving services, thus we rely on the traditional Employer-Employee relationship at each of our branches which results in significant overhead costs to administer the many functions and costs required when you have people and equipment operating in the public domain.

Specifically for Lile there are costs associated with payroll, payroll taxes, benefits and workers compensation insurance that add an average of 40%+ to our cost of labor. We have trucks which require maintenance, fuel, registration fees and insurance also adding significantly to our costs. We have a rigorous and on-going driver qualification and certification process along with background checks for all employees having contact with our consumer and commercial clients. My presumption is that the Bellhops model, in addition to appearing to be in conflict with the long-standing directive of the UTC, is operating without any of these costs or expenses and as such puts my company at a distinct disadvantage in successfully converting opportunities to booked orders since their costs will not contain any of these elements which we have been told are mandatory if we wish to participate in the HHG relocation industry in Washington.

Also of concern is the potential impact to Washington consumers who will most typically select their service provider based upon a model which gives disproportionate weight to identifying the low-cost provider. Since the service-providing element of the Bellhop operation is separate and distinct from the entity which has the operating authority, how can we effectively compete on price and how can the UTC regulate with respect to both safety and protecting consumer rights?

Sincerely Yours
LILE INTERNATIONAL COMPANIES

Diane DeAutremont
President

Corporate Headquarters

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