



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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September 7, 2023

Kathy Hunter, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

RE: *Washington Utilities and Transportation Commission v. Rocket Van Lines LLC*  
Commission Staff's Response to Application for Mitigation of Penalties  
Docket TV-230634

Dear Ms. Hunter:

On August 28, 2023, the Washington Utilities and Transportation Commission (Commission) issued a penalty assessment against Rocket Van Lines LLC d/b/a Rocket Pro Movers; Lake CDA Pro Movers, (Rocket Van Lines or Company), in the amount of \$1,700 for violations of Washington Administrative Code (WAC) 480-15-550, Cargo Insurance; WAC 480-15-555, Criminal Background Checks for Prospective Employees; and WAC 480-15-570, Driver Safety Requirements, which adopts Title 49 Code of Federal Regulations (49 C.F.R.) Part 391 – Qualification of Drivers, as follows:

- **Eight violations of WAC 480-15-550 – Failing to maintain cargo insurance while operating a motor vehicle as required.** The Company operated a commercial motor vehicle (CMV) without the required cargo insurance on eight occasions between March 30 and May 18, 2023.
- **One violation of WAC 480-15-555 – Failing to conduct or retain paperwork containing criminal background checks or hiring an individual with a disqualifying conviction for a household goods carrier in the state of Washington.** Rocket Van Lines failed to conduct a criminal background check prior to hiring employee Martin Moylan.
- **Eight violations of 49 C.F.R. § 391.45(a) – Using a driver not medically examined and certified.** The Company allowed driver Martin Moylan to operate a CMV without a valid medical certificate on eight occasions between March 30 and May 18, 2023.

On August 29, 2023, the Company filed with the Commission its application for mitigation of penalties. In the request for mitigation, Amanda Conner, operations manager of Rocket Van Lines, admits the violations, and asks that the penalties be waived entirely. Commission staff (Staff) addresses the Company's request for mitigation, as follows:

- **Mitigation Request: WAC 480-15-550 – Failing to maintain cargo insurance while operating a motor vehicle as required.** Rocket Van Lines states it had \$10,000 in cargo insurance coverage and was not aware that the requirement for Washington state was \$20,000. The Company states the discrepancy was an oversight and immediately corrected.
- **Staff response:** It is Rocket Van Lines's responsibility to certify that its CMVs are insured to meet the minimum limits of required cargo insurance.

The Company promptly corrected these violations by filing an updated insurance binder with the Commission on September 7, 2023. The updated binder shows that Rocket Van Lines now has the required \$20,000 in cargo coverage. The assessed penalty is \$800 for eight occurrences of this violation. Staff recommends the penalty be reduced to \$400.

- **Mitigation Request: WAC 480-15-555 – Failing to conduct or retain paperwork containing criminal background checks or hiring an individual with a disqualifying conviction for a household goods carrier in the state of Washington.** Rocket Van Lines acknowledges that the violation occurred and that the Company did run a background check on employee Martin Moylan one month after employment began. Rocket Van Lines states that the background check was run due to the Company's internal protocol of conducting background checks as a precautionary measure.
- **Staff response:** Employees with unknown criminal histories raise serious concerns about the security of the customer's belongings, as well as the customer's personal safety. Rocket Van Lines corrected this violation when a background check was received on Martin Moylan. The Company did not provide Staff with supporting documentation or an explanation on how it will prevent future violations of this regulation in the future. The assessed penalty is \$100 for one occurrence of this critical-type violation. Staff recommends no mitigation of this \$100 penalty.
- **Mitigation Request: 49 C.F.R. § 391.45(a) – Using a driver not medically examined and certified.** Rocket Van Lines states it believed that medical certification was optional for non-CDL trucks after seeking advice from the Idaho State Police. The Company states they now understand this was a misunderstanding and moving forward will comply with the medical certification requirements.
- **Staff response:** Rocket Van Lines promptly corrected this critical-type violation upon discovery of non-compliance. The Company provided proof of a valid medical certificate for driver Martin Moylan prior to the closing of the safety investigation. The assessed penalty is \$800 for eight occurrences of this violation. Staff recommends the penalty be reduced to \$400.

Kathy Hunter  
September 7, 2023  
Page 3

Despite receiving prior technical assistance, Rocket Van Lines incurred violations that resulted in administrative penalties consistent with the enforcement policy. Once aware of the non-compliance, the Company took immediate actions to correct the violations. Staff recommends the assessed penalty of \$1,700 be reduced to \$900.

If you have any questions, please contact Jason Sharp, Motor Carrier Safety Supervisor, Transportation Safety, at (360) 701-1603, or by email at [Jason.Sharp@utc.wa.gov](mailto:Jason.Sharp@utc.wa.gov).

Sincerely,

Jason Sharp  
Motor Carrier Safety Supervisor, Transportation Safety