

**From:** [Jim](#)  
**To:** [Records Management \(UTC\)](#)  
**Subject:** Fwd: NOTICE OF TARIFF RATE INCREASE SUPPLEMENT dated June 17, 2022  
**Date:** Sunday, June 19, 2022 2:18:04 PM  
**Attachments:** [TV-210535 and TV-210812 - Notice Of Tariff Rate Supplement.pdf](#)

External Email

State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

06/21/22 07:09

Received  
Records Management

Sent from my iPhone

Begin forwarded message:

**From:** jim@wmc movers.com  
**Date:** June 17, 2022 at 4:43:00 PM PDT  
**To:** householdgoods@utc.wa.gov  
**Cc:** "Maxwell, Amanda (UTC)" <amanda.maxwell@utc.wa.gov>, arendahl@utc.wa.gov, ddanner@utc.wa.gov  
**Subject:** NOTICE OF TARIFF RATE INCREASE SUPPLEMENT dated June 17, 2022

Good Afternoon –

**Reference:** NOTICE OF TARIFF RATE INCREASE SUPPLEMENT dated June 17, 2022. See attached.

I truly dislike being the “*bad guy*” all the time when it comes to dealing with the Commission staff regarding Intrastate HHG Moving issues in Washington State.

But the above Reference is totally out of line as follows:

1. The following is a ridiculous, burdensome requirement – “*If carriers choose to apply the Tariff Supplement, both the maximum rate(s) and/or charge(s) as currently reflected in Tariff 15-C and the percent increase applied (not to exceed 12.1 percent) must be documented as separate line items on the estimate and the bill of lading. The notation must show the current maximum Tariff 15-C*”

*rate(s) or charge(s), the amount of supplemental increase being applied (not to exceed 12.1 percent), and the combined total amount billed to the customer.”*

2. The verbal Order presented by Commissioner Ann Rendall and seconded by the Chairman Dave Danner and agreed to by me at the UTC Open Meeting on May 26, 2022 mentioned nothing about documenting the percent increase applied (not to exceed 12.1 percent) and then documented as a separate line item item(s) on the estimate and the Bill of Lading showing the current maximum Tariff 15-C rate(s) or charge(s), the amount of the supplemental increase being applied (not to exceed 12.1 percent), and the combined total amount billed to the customer.
3. Clear instructions were provided in the HHG Tariff No. 15-C “Rate Increase Supplement No. 2022-1”, effective May 27, 2022, on how to apply the 12.1 percent increase under “Rules for Applying Rates”.
4. Again, Commission staff did not discuss these new requirements and there need with the intrastate moving industry or the Washington Movers Conference prior to sending out this supplement dated June 17, 2022.

It is clear to me the Commission staff working in “Household Goods” does not have a working knowledge of the HHG rules contained in WAC 480-15 and HHG Tariff No. 15-C, particularly those paragraphs in the WAC and ITEMS contained in HHG Tariff No. 15-C that apply to rates and charges and the documentation of such on the Estimated Costs for Services and the Uniform Household Goods Bill of Lading. The Current HHG Tariff No. 15-C, as you know, is a Minimum Rate/Maximum Rate Tariff.

Not one intrastate HHG shipment moves as a Mileage Rated or Hourly Rated move until the customer and the regulated

HHG carrier representative are in agreement with rates and charges to be assessed for moving the customer's HHG and the customer provides his or her acknowledgement to the rates and charges to be assessed by signing the Estimated Costs for Services and any Supplemental Estimated Costs for Services that may be needed. All the rates and charges are fully included on the Estimated Costs for Services and the Uniform Household Goods Bill of Lading.

Unlike most transportation entities regulated by the Commission, the Intrastate HHG moving industry is very competitive. If the customer is not satisfied with one carrier's rates and charges, he/she simply needs to call another carrier and compare rates and charges. The industry often recommends the customer contact at least three HHG carriers for comparison purposes.

Should there be a Consumer Complaint, and the UTC Household Goods Audit staff needs to determine what the percentage of increase was used for an individual rate not to exceed 12.1 percent or the total cost of the move, they simply need to review the move documents and do the appropriate mathematical calculation.

There is no need to list all of the separate line ITEM charges (and there are many in the HHG Tariff No. 15-C) showing the percentage of increase on the Estimated Costs for Services or the Uniform Household Goods Bill of Lading and the applicable percentage of increase over the current Maximum Rate in the HHG Tariff No. 15-C. That would involve an additional workload for the HHG carriers staffs already overburdened in the midst of the moving industries "Peak Moving Season". How is the sales person or work crew on site going to do all the calculations needed without running up the clock on an Hourly Rate Move? In addition, both forms have no more room for additional information.

Professional, properly regulated, and background checked

intrastate HHG Carriers are honest, hard working folks. And that includes their employees. They are not out to gauge consumers in any way on the cost of the consumer's HHG's move.

I desperately request this June 17, 2022 "NOTICE OF TARIFF RATE INCREASE SUPPLEMENT" be "Recalled" as soon as possible.

Thank you.

Jim Tutton, Jr., Executive Director  
WMC

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cf: WMC Board of Directors