



## Washington Movers Conference

TV-210535

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James R. Tutton, Jr.  
Executive Director

December 19, 2022

Ms Amanda Maxwell  
Executive Director/Secretary  
Utilities & Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

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Dear Ms Maxwell,

**Reference:** UTC Open Meeting Agenda for December 22, 2022, ITEM B-2, TV-210535, Clutter, Inc., received Friday, December 16, 2022.

The Washington Movers Conference strongly opposes this Petition to extend the waivers from Tariff 15-C and certain provisions of WAC 480-15 granted in Order 02 of this docket until March 31, 2023, or until the Commission completes its review of Tariff 15-C, whichever occurs sooner. The Company provides Household Goods moving services.

This regulated HHG moving issue has gone on far too long. The UTC study of Clutter, Inc.'s business practices started in June of 2019 with several findings.

Docket TV-210535 was opened in October 2021.

Let's all parties subject to this Petition come to agreement that -

1. Commercial Storage of HHG in Washington State is not regulated.
2. Clutter, Inc. is primarily a Commercial Storage provider, as evidenced by their web site, but does have the opportunity through their HHG Operating Authority, HG 67494, to provide moving services within Washington for consumers.
3. Approximately 320 properly regulated HHG Carriers holding either a UTC Provisional or Permanent HHG Operating Authority can in their primary business of providing Intrastate HHG moving services provide storage services, either Storage-In-Transit, 90-days or less; or Permanent Storage for periods of 91 days or longer **at the customer's request** in accordance with WAC 480-15 and the UTC Intrastate HHG Tariff No. 15-C.

4. **WAC 480-15-190 Service territory.** Household goods permits authorize statewide operations unless:

(1) An applicant elects to limit the service territory to specific counties;

or

(2) The commission, by order, limits an applicant's service territory.

Clutter, Inc. states in their web site their service location is the greater Seattle area only.

Since the October 14, 2021, Docket TV-210535 Order 01 granting exemptions from Tariff 15-C and commission rules, properly regulated HHG Carriers in Washington have been disadvantaged for 14 months by not being allowed to charge HHG Tariff No. 15-C Rates and Charges below the Minimum Rate Band found in Tariff No. 15-C as Clutter, Inc. has been allowed.

Today, I pulled up Clutter, Inc.'s Customer Reviews on the Better Business Bureau Seattle web site, <https://www.bbb.org/us/ca/culver-city/profile/moving-and-storage-companies/clutter-inc-1216-348432/customer-reviews>. I understand the reviews are not identified by specific service locations; but non-the-less they are attributed to Clutter, Inc.

Therefore, it is believed the UTC should perform a solid compliance review of Clutter, Inc.'s "Terms of Use", Privacy Policy, and "Limited Security Warranty Policy" as found on their web site under Legal Terms. Their Valuation Program, for example, states their obligation for loss and damage caused by Clutter, Inc. is limited to \$1.00 per pound. There also appears to be issues with applying rates and charges as evidenced by customer complaints.

This is the third set of comments submitted by the WMC in this Docket TV-210535 ongoing proceeding.

The regulated Intrastate HHG Carriers in Washington and specifically the members of the Washington Movers Conference can only hope some appropriate review of Clutter, Inc.'s operations IAW WAC 480-15 and the UTC Intrastate HHG Tariff No. 15-C is performed before the changes to the Tariff requested by Clutter, Inc. get approved.

Sincerely,



James R. Tutton, Jr.  
Executive Director