August 20, 2020

Mark L. Johnson Executive Director and Secretary Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, WA 98504-7250

Re: Application for Permit to Operate as a Common Carrier by Dolly, Inc. Docket No. _____

By Electronic Filing

Dear Mr. Johnson:

On behalf of Dolly, Inc., enclosed for filing are:

Permit Application for Common Carrier of Property, Excluding Household Goods (Application);

Petition for Exemption from Washington Administrative Code Sections 480-14-250(1), 480-14-250(1)(e) and 480-14-110 (Petition for Exemption);

Legal Memorandum Regarding Use of Independent Contractors by Common Carriers in Support of Application of Dolly, Inc., for Permit to Operate as a Common Carrier (Legal Memorandum); and

Declaration of Michael Howell in Support of Petition for Exemption from Commission Rules and in Support of Application of Dolly, Inc., for Permit to Operate as a Common Carrier (Howell Declaration).

A representative of Dolly, Inc. will pay the application fee.

From our earlier discussions with Commission Staff, we understand that there may be concerns about some aspects of Dolly's operations, particularly involving insurance coverage and the legality of Dolly's use of independent contractors. We are submitting the Legal Memorandum and the Howell Declaration in an effort to answer any factual or legal questions that Staff may have and, therefore, to expedite consideration of the Application and Petition.

SEATTLE 1201 Third Avenue Suite 320 Seattle, WA 98101 (206) 292-6300 voice (206) 292-6301 fax OLYMPIA 606 Columbia Street NW Suite 212 Olympia, WA 98501 (360) 786-5057 voice (360) 786-1835 fax





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We look forward to discussing the Application and Petition with Commission Staff and working through any remaining concerns, and to your expeditious consideration of this matter.

Sincerely,

/s/ Jeffrey D. Goltz

Jeffrey D. Goltz Direct Line: (360) 528-3026 Email: jgoltz@cascadialaw.com Office: Olympia

Enclosures

Cc (by electronic mail):

Kathy Hunter, UTC Amanda Maxwell, UTC Mathew Perkinson, UTC Jason Lewis, UTC Sally Brown, Senior Assistant Attorney General Michael Howell