

From: Charlie Naubert, Vice President, Allwest Transportation

Re: TV-210535 and TV-210812

Date: June 12, 2023

- Item 50 – OT *“The carrier may not charge overtime for accessorial services”*: Why would overtime charges not be applicable to accessorial services? Packing is one of the most labor intensive and costly services offered. What about unpacking? What if a 3rd party specialty service is required? Ie: Grandfather clock or washing machine service. Those service providers will be charging overtime – that cost should be able to be passed through.
- Item 90, para 9c – *“Depreciated Replacement Cost Coverage with Deductible. This option provides full, **depreciated**, value coverage less a \$300 deductible.”* Will the UTC be publishing guidelines to determine the depreciated value? Who will be responsible for this?
- Item 230 – This entire section is unnecessary and confusing. How will this benefit the consumer? Is there really a need for the ability to charge in one-minute increments? This sounds like it is tailored to one very specific business model that has an ability to make up that revenue in other ways which may not be regulated.

Additional concern:

While I very much appreciate the 12.1% overall rate increase and the plan to anchor it to the Seattle CPI, it is not nearly enough. The moving industry is especially vulnerable to the many of the largest drivers of the consumer price index. Diesel fuel, corrugated cardboard, used vehicle (especially mid-size trucks), commercial warehouse and labor wage growth are all massive cost drivers for our companies. A much more specific measure, the *Producer Price Index industry data for Used household and office goods moving – Residential moving services, local* confirms a 30% increase from July 2016 to July 2022, with most of that coming within the last 18 months. (source: US Bureau of Labor Statistics: <https://beta.bls.gov/dataViewer/view/timeseries/PCU48421048421041;jsessionid=E0997061273F2CC9FE342AA3BEA59E20>)

A removal of the upper rate band cap or a much larger overall increase (50%) would allow moving companies to adapt to rapidly changing market conditions and seasonality.

Sincerely,

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