



Washington Movers Conference

TV-210812

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

Received
Records Management
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Dear Ms Maxwell,

Reference: Inquiry to determine Appropriateness of updates to Tariff No. 15-C in Consolidated Dockets TV-210535 and TV-210812, service date May 12, 2023.

As you have likely expected, the Washington Movers Conference is not pleased with the foregoing reference. Once again the updates being presented were discussed behind closed doors without representation from the Intrastate HHG Moving Industry prior to publishing the Inquiry.

Time and again I have complained about this unacceptable practice. To be open and fair, the Utilities and Transportation Commission must schedule a discussion meeting with all appropriate parties to sit down around a conference table and openly discuss these proposed changes to the UTC Intrastate HHG Tariff No. 15-C perceived to be needed prior to being presented to the UTC Commissioners at an Open Meeting.

Yes, the UTC held a Workshop more than a year ago on May 5, 2022, in response to the UTC "Notice of Opportunity to Submit Comments regarding potential changes to Tariff 15-C in Consolidated Dockets TV-210535 and TV-210810", dated February 22, 2022, yet took another year to publish the results in the above reference. This is unacceptable.

It also must be noted that there are additional changes proposed contained in the above reference not previously discussed with the Intrastate HHG Moving Industry. They are shown in italics but are not all inclusive –

ITEM 50 – Overtime. Proposed by the UTC staff: *"Overtime will be performed only at the request of the customer and at the option of the carrier. The carrier must provide the customer with a written Estimate of the total overtime charges and obtain the customer's written consent before providing overtime service."*

WMC concern – How will the HHG carrier determine "total overtime charges" for the customer's signature on the Estimate when they depart from the customer's

residence until the truck(s) and work crew return to the company's home location on hourly rated moves? There are a number of factors that could impact the final time.

ITEM 50 – Overtime, para 4. Proposed by the UTC staff: *“Carrier may not charge overtime for accessorial services.”*

WMC concern - The UTC Tariff No. 15-C, Definitions, describes accessorial services as *“Any service provided by a household goods carrier that supplements or is incidental to, the transportation of household goods. Examples include, but are not limited to, packing, unpacking, wrapping, or protecting portions of the shipment or providing special equipment or services such as hoisting.”* So why wouldn't Overtime Charges for this work provided by the regulated intrastate HHG carrier be applicable?

ITEM 85 – Estimates, para 3c. Proposed by the UTC staff: *“If the carrier is unable to prove their customer received the brochure electronically, the customer must sign or initial indicating the customer received the brochure.”*

WMC concern – What? This statement is confusing.

ITEM 100 – Storage, para 3a. Proposed by the UTC staff: *“If the customer selects Permanent Storage on the bill of lading but elects to remove the goods from storage within 90 days, the shipment is still considered to be permanent storage.”*

WMC concern – A non-regulated entity providing only commercial storage can entice the customer to select Permanent Storage for their HHGs at non-regulated rates to obtain the customer's business.

ITEM 100 – Storage, para g. Proposed by the UTC staff: Change in destination from that shown on the original bill of lading: The customer may change the destination originally shown on the bill of lading for the property in SIT by notifying the carrier. When the carrier receives the notice, the carrier will make a notation on the bill of lading indicating that the customer requested the change *and provide the following information on the Bill of Lading: i. Date the customer submitted the request to the carrier. ii. Method of communication in which the customer submitted the request. iii. New destination address to where the goods will be moved, and iv. Signature or initials of the carrier representative that received the request.*

WMC concern – Where will the HHG carrier find space on the current 8" x 14" HHG Bill of Lading? If this information is required, suggest additional information be attached to the HHG Bill of Lading.

ITEM 230 – Alternate Time Recording. Proposed by UTC staff: *This form must be completed by carriers electing to charge customers in 1-minute increments, as documented on the Bill of Lading, and/or choosing alternate minimum charge for moves to be charged as described in Tariff 15- C, Item 230.*

WMC concern - This is a trap for Intrastate HHG Carriers. If the carrier forgets to file the form or wishes to change his/her selection, they will be subject to penalties from the UTC.

ITEM 230 – Section 4, Alternative Minimum Charge for Moves. Proposed by UTC staff: *Tariff 15-C Item 230, Section 4, Alternative Minimum Charge for Moves: Please indicate below the minimum hours the carrier will charge for all local, hourly rated moves in accordance with Tariff 15-C Item 230(4): a) The alternative minimum charge for a shipment moving under hourly rates may be up to 1 hour but must not exceed one hour. Minimum time the carrier will charge all customers:* _____.

WMC concern: The minimum is one hour, not 10-minutes.

b) If the customer requests a move Monday through Friday, before 8:00 a.m., and after 5:00 p.m. or on a Saturday, Sunday, or state-recognized holiday, the alternative minimum charge for a shipment may be up to but must not exceed four hours. Minimum time the carrier will charge all customers: _____.

WMC concern: The intrastate HHG carrier will lose revenue with this procedure.

ITEM 230, Section 6, Alternative Time Recording. Proposed by UTC staff: *Please select the time recording option the carrier will apply to all local, hourly rated moves in accordance with Tariff 15- C Item 230(2). The carrier will record time in:*

1-minute increments; or

15-minute increments Registered Name of Business on file with Commission

(include all dba): _____

Official Physical Address: _____

THG/HHG Permit Number: _____

Official Telephone Number: _____

Official Email Address: _____

Company Website: _____

Company Representative Printed Name: _____ Title: _____

Signature: _____ Phone Number: _____

Date: _____

WMC concern: Here again this is a trap for Intrastate HHG Carriers. If the carrier forgets to file the form or wishes to change his/her selection, they will be subject to penalties from the UTC.

Therefore, the WMC hereby requests an "Open Roundtable" meeting be scheduled for all parties to properly discuss these changes prior to any scheduled "Open Meeting" before the UTC Commissioners. I, for one, do not want to go before the Commissioners again in an argumentative mode when they will just vote in line with UTC staff.

Thank you for your consideration.

Sincerely,


James R. Tutton, Jr.
Executive Director