



Washington Movers Conference

of the Washington Trucking Associations

930 South 336th Street, Suite B

Federal Way, WA 98003-6384

(253) 838-1650

1-800-732-9019

Fax (253) 838-1793

www.wmcmovers.com

James R. Tutton, Jr.
Executive Director

July 19, 2013

Mr. Steve King
Executive Director/Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Dear Mr. King:

The Washington Movers Conference (WMC) would like to provide the following comments to the Commission's "Rulemaking to Revise Household Goods Carrier Rules WAC 480-15, Docket TV-130079, dated June 19, 2013.

The WMC appreciates the work the Washington Utilities and Transportation Commission (WUTC) staff has accomplished to revise the rules.

The WMC provides the following comments:

A. This comment may or may not be related to WAC 480-15 Rules. I could not find any reference to a regulated moving company using independent contractor employees for intrastate household goods moves. Are they permissible?

B. The final comment relates to WAC 480-15-890 Commission –referred complaints. The WMC believes the requirement for the carrier to respond to commission staff inquiries requesting additional information or documentation within **two** business days is too small a window. Appropriate carrier staff may be out of the office ill, vacation time, or away on business travel. If documents have been mailed, they may not get to the carrier in a timely fashion. Recommend retaining the five business day window.

The WMC believes the remaining proposed changes will certainly strengthen consumer protection needs for folks making their first or tenth intrastate household goods relocation..

Should you have any questions, please feel free to contact me.

Sincerely,



James R. Tutton, Jr.
Executive Director