

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In Re: ALL MY SONS MOVING & STORAGE OF SEATTLE, INC., HG058846	PENALTY ASSESSMENT NO. 050537  REQUEST FOR HEARING
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All My Sons Moving & Storage of Seattle, Inc. (“All My Sons”) requests a hearing to contest the occurrence of the violations, or in the alternative request a mitigation of the amount of the penalties, set forth in Penalty Assessment No. 050537 (the “Penalty”) for the following reasons (identified by paragraph number as used in the Penalty):

1-10 All My Sons does not deny that the violations regarding estimate forms technically occurred, but All My Sons was not advised during a prior audit to stop using the forms.

11 The circumstances did not require supplemental estimates to be issued in each of the seven moves for which this penalty is based.

12 WAC 480-15-680 as used for the assessment of the Penalty is in conflict with WAC 480-15-690 and should not support a penalty in this situation.

14 All My Sons believes it can produce the estimate, or explain its absence, for two of the three moves where the estimate was not attached.

15 This penalty should be mitigated as no harm came to any shipper as a result of these oversights in filling in the forms.

16 All My Sons does not deny that the violations regarding phone numbers technically occurred, but All My Sons was not advised during a prior audit to stop using the forms.

17 Two of these moves were not put into storage with All My Sons.

18-19 These penalties should be mitigated as no harm came to any shipper as a result of these oversights in filling in the forms.

ORIGINAL

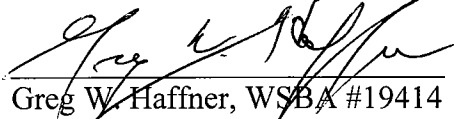
24 All My Sons only received the notices from the Commission that preceded the response of All My Sons within the required ten business day period. Since the other notices were not received, no penalties should be issued.

25-30 All My Sons received confusing directions from Commission staff and was not advised to change how it was using old forms regarding rates and charges.

All My Sons requests an opportunity to present evidence in support of this request for hearing at a time and place convenient to the Commission.

Dated this 26<sup>th</sup> day of September.

CURRAN MENDOZA, P.S.



Greg W. Haffner, WSBA #19414  
Attorney for All My Sons  
Moving & Storage of Seattle, Inc.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served PENALTY ASSESSMENT NO. 0037 –  
3 REQUEST FOR HEARING upon the entity listed below by electronically transmitting said  
4 document in PDF format to the UTC Records Center at records@wutc.wa.gov, in addition, I  
5 have this day deposited the original and (3) copies of said document with ABC Legal

6 Services for delivery to:

7  
8 Executive Secretary  
9 Washington Utilities and Transportation Commission  
10 PO Box 47250  
11 1300 S. Evergreen Park Drive. S.W.  
12 Olympia, WA 98504-7250

13 Dated at Kent, this 28th Day of September, 2005

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15 Marina Anna Baker  
16 Marina Anna Baker