

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of, Determining the Proper  
Carrier Classification of, and Complaint for  
Penalties Against:

Dolly, Inc.

Docket No: TV-171212

DOLLY, INC. PETITION FOR  
ADMINISTRATIVE REVIEW OF ORDER 07  
DENYING APPLICATION FOR  
MITIGATION OF PENALTIES

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**I. INTRODUCTION**

Dolly, Inc. (“Dolly”) files this Petition for Administrative Review (“Petition”) for the reasons set forth herein. Accordingly, pursuant to WAC 480-07-610 (7)(a), Dolly petitions for administrative review by the Washington Utilities and Transportation Commission (“UTC” or “Commission”) of Order 07 filed on August 31, 2018. Order 07 denied Dolly’s Application for Mitigation of Penalties and orders that the \$69,000 penalty assessed in Order 04 remains due, and must be paid within five days of the date of Order 07.

**II. REQUESTED RELIEF**

Dolly requests the Commissioners review Dolly’s Request for Penalty Mitigation and use its discretion to determine that Dolly is eligible for penalty mitigation under Docket No. A-120061.

**III. BACKGROUND AND FACTS**

On May 18, 2018 the Commission filed Order 04 which ordered Dolly to immediately cease operating as a household goods carrier, common carrier, and solid waste collection company unless it obtains authority from the Commission. After the Commission filed Order 04, rather than cease operating, Dolly made significant changes to its business operations and applied for a household goods carrier permit, the permit application included filing a Petition for

1 Rule Exemption.<sup>1</sup> As of this filing, the Commission has neither granted or denied Dolly’s permit  
2 applications or determined a final disposition of the Petition for Rule Exemption.

3 **IV. ARGUMENT**

4 Dolly’s filings in this docket, *Opposing Commission Staff’s Motion to Impose Penalties*<sup>2</sup>  
5 and its *Application for Penalty Mitigation*<sup>3</sup> explain Dolly’s attempts to comply with Order 04,  
6 which holds, “[Dolly] must, in some way, alter its advertisements to ensure it no longer holds  
7 itself out as providing unauthorized services in Washington. ... this can be accomplished in  
8 more than one way.”<sup>4</sup> Even before the Brief Adjudicative Proceeding hearing on March 13,  
9 2018 Dolly began altering its online presence to ensure no statements could be construed to  
10 advertise the performance of regulated services in Washington state.

11 Order 07 states, “Dolly fails to accept responsibility for its decision to continue operating  
12 in violation of the Commission’s cease and desist order, which required the Company to shut  
13 down its operations until such time its application is approved.”<sup>5</sup> This statement construes Order  
14 04 to mean the only means of compliance with the Order is that Dolly must completely shutter  
15 its doors and cease operating. As explained in its prior filings, rather than ceasing to operate,  
16 Dolly interprets Order 04 to mean exactly what it says; that applying for operating authority and  
17 “altering its advertisements” will comply with Order 04 – Dolly has done both.

18 The Commission has repeatedly stated that its “ultimate objective in any enforcement  
19 action is to obtain compliance with applicable law.” See *WUTC v. CenturyLink*, Docket UT-  
20 140597, Order 03, Final Order Approving Settlement Agreement ¶ 10 (Feb. 22, 2016); accord,  
21 e.g., *WUTC v. Ride the Ducks*, Docket TE-151906, Order 08, Order Approving Settlement  
22 Agreement with Conditions ¶ 8 (May 3, 2016). Here, Dolly has attempted to comply with Order  
23 04 while the Commission deliberates the fate of its operation permit application.

24 **V. CONCLUSION**

25 The record is clear that Dolly continues to attempt to comply with Order 04 and is not  
26 flouting the law and the Commission’s Order. The use of penalties to force compliance makes

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<sup>1</sup> See Docket TV-180605.

<sup>2</sup> See Attachment 1.

<sup>3</sup> See Attachment 2.

<sup>4</sup> See Docket TV-171212, Order 04 at ¶ 39.

<sup>5</sup> See Docket TV-171212, Order 07 at ¶ 10.

1 no sense under the circumstances presented and are clearly unnecessary to achieve the  
2 Commission’s stated objective in Docket UT-140597, Order 03. However, if penalties are  
3 imposed, the Commission has reasonable grounds to determine that Dolly is eligible for penalty  
4 mitigation due to Dolly’s attempted compliance with Order 04, all of which undoubtedly leads to  
5 the conclusion that, “circumstances exist to warrant a lesser penalty” See Docket A-120061,  
6 Other Order, Enforcement Policy of the Washington Utilities and Transportation Commission ¶  
7 19 (January 4, 2013).

8  
9 Dated this 20th of September, 2018.



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11 Armikka R. Bryant, WSBA No: 35765  
12 Director of Legal and Government Affairs  
13 Dolly, Inc.  
14 901 5th Avenue, Suite 600  
15 Seattle, Washington 98164-2086  
16 Office: 206-413-5312  
17 Fax: 833-817-6581  
18 Email: armikka@dolly.com

BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of, Determining the Proper  
Carrier Classification of, and Complaint for  
Penalties Against:

Dolly, Inc.

Docket No: TV-171212

DOLLY, INC'S RESPONSE OPPOSING  
COMMISSION STAFF'S MOTION FOR  
IMPOSITION OF PENALTIES FOR  
VIOLATION OF COMMISSION ORDER

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**I. INTRODUCTION**

Dolly, Inc. (“Dolly”) opposes Washington Utilities and Transportation Commission Staff’s (“Staff” or “Commission Staff”) Motion for Imposition of Penalties for Violation of Commission Order (“Staff’s Motion” or “Motion”). Accordingly, pursuant to WAC 480-07-375 Dolly files this Response Opposing Commission Staff’s Motion and requests the Washington Utilities and Transportation Commission (“Commission”) deny Staff’s Motion.

**II. REQUESTED RELIEF**

Dolly requests the Commission maintain the suspension of penalties imposed in Docket Number TV-171212, Order 04 (“Order 04”).

**III. BACKGROUND AND FACTS**

On May 18, 2018 the Commission filed Order 04 which ordered Dolly to immediately cease operating as a household goods carrier, common carrier, and solid waste collection company unless it obtains authority from the Commission. Order 04 also assessed a \$69,000 penalty, \$34,500 of which was suspended until June 19, 2019 if Dolly either obtained operating authority from the Commission or made numerous changes to its business operations.

On March 26, 2018, well before Order 04 was even filed, Dolly inquired about the Commission’s permitting process.<sup>1</sup> After Order 04 was filed, rather than cease operating, Dolly chose to make significant changes to its business operations and also obtain operating authority

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<sup>1</sup> See Attachment A dated March 26, 2018: Email to Commission Licensing Services Division requesting guidance regarding the application permit process.

1 from the Commission. On May 29, Dolly again contacted Staff seeking guidance regarding  
2 requirements for the permit application process.<sup>2</sup> Also, on May 29, Staff Assistant Attorney  
3 General (“AAG”) Jeffrey Roberson contacted Dolly to provide advice regarding the permit  
4 application process.<sup>3</sup> This advice included recommending that Dolly “request an exemption  
5 from some of the Commission’s rules” that AAG Roberson believes do not apply to Dolly’s  
6 business model. *Id.*

7 While Dolly appreciated AAG Roberson’s gesture, it nevertheless acknowledges the  
8 complications inherent with Dolly complying with Order 04. In light of this fact, Dolly filed a  
9 Petition for Rule Exemption with the permit applications it filed on July 9.<sup>4</sup> As of this filing,  
10 Commission Staff has neither granted or denied Dolly’s permit applications as Staff now moves  
11 for the Commission to enforce the suspended penalties imposed in Order 04.

#### 12 IV. ARGUMENTS

##### 13 A. Dolly has acted in good faith to comply with Order 04

14 Even though Dolly’s Motion to Stay the Effectiveness of Order 04 was denied, it was  
15 filed on May 29 with the good faith intention of complying with the Order. Yet, Staff’s current  
16 Motion asserts that Dolly intends to, “flout the law and the Commission’s Order with impunity.”  
17 The facts however do not support this statement. Indeed, since the Commission issued Order 04,  
18 Dolly has filed household goods and common carrier permit applications with the Commission;  
19 exactly what Order 04 requests even though Commission Licensing Division staff now assert  
20 that Dolly is not required to obtain a common carrier permit.<sup>5</sup>

21 Dolly began compliance with Order 04 within the timeframe the Order permits and has  
22 worked diligently towards that end since then. As of the date of this filing, Dolly’s permit  
23 applications have been submitted and are currently under review by the Commission’s Licensing

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<sup>2</sup> See Attachment B dated May 29, 2018: Email to Commission Licensing Services Division requesting guidance regarding the application permit process.

<sup>3</sup> See Attachment C dated May 29, 2018: Email from AAG Mr. Jeffrey Roberson suggesting that Dolly request exemptions from specific regulations.

<sup>4</sup> See Attachment D dated July 17, 2018: Email from Dolly’s counsel Ms. Donna Barnett confirming Dolly’s permit applications and Petition for Exemption were filed on July 6, 2018.

<sup>5</sup> See Attachment E dated July 10, 2018: Email from Mr. Michael Dotson informing Dolly’s counsel that Dolly, “will receive Common Carrier authority with [a] Household Goods Moving permit.”

1 Services Division. In fact, the Commission has allowed Dolly until August 18, 2018, to provide  
2 additional information supporting its application.<sup>6</sup>

3 There is no question that Dolly is working diligently and in full cooperation with Staff to  
4 perfect its current application and to obtain the authority required by the Commission. Under  
5 these circumstances, it appears that Staff's Motion is seeking to punish Dolly for exercising its  
6 right to contest Staff's earlier assertion of regulatory jurisdiction over Dolly's business activities;  
7 it certainly is not necessary to force compliance.

8 In conclusion, Dolly and the Commission's Licensing Staff are working cooperatively  
9 and should conclude the licensing process within the timeline proposed by Licensing Staff.<sup>7</sup>  
10 Staff's Motion seeks relief unnecessary to ensure compliance with Order 04 and is based on  
11 assertions inconsistent with the facts. For these reasons, it ignores Dolly's good faith efforts to  
12 comply with Order 04 and should be denied.

13 **B. Dolly has not been granted sufficient time to obtain operating permits from the**  
14 **Commission as ordered in Order 04**

15 As evidenced by AAG Roberson's communication with Dolly, Dolly's permit application  
16 process was atypical. This additional complexity demanded more time than Dolly anticipated to  
17 complete the application process. Dolly submitted applications for operating permits to  
18 Commission Staff on July 6, before Staff filed this Motion.<sup>8</sup> Clearly Staff was aware of those  
19 applications but nevertheless filed this Motion, which if granted, would have the effect of  
20 punishing Dolly for the complicated application process expressly acknowledged by AAG  
21 Roberson. Commission Staff also clearly recognized Dolly's application process would take  
22 more time than the ten days Order 04 allowed because their investigation did not begin until June  
23 15 and continued until July 10. Under the circumstances, the Commission should deny Staff's  
24 Motion or at the very least allow Commission Staff the opportunity adequate time to process  
25 Dolly's permit applications before determining to enforce suspended penalties.

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<sup>6</sup> See Attachment F dated July 18, 2018: Email from Mr. Michael Dotson Dolly notifying Dolly that its application was under review and required clarification in two areas; the relationship between the application's UBI number and corporate name and justification for specific requests for waivers from Commission rules.

<sup>7</sup> See Attachment F.

<sup>8</sup> See Attachment D.

1           **C. UTC Staff Simultaneously Processing Dolly’s Permit Applications While Moving to**  
2           **Lift Suspended Penalties Creates a Conflict of Interest**

3           Commission Staff controlled the timeline for Dolly’s compliance with Order 04 from the  
4 moment Dolly finalized its applications for operating authority on July 9. Staff filed this Motion  
5 the very next business day. As of the date of this filing, the Commission’s Records Division has  
6 not published Dolly’s applications on the Commission website and Commission Staff has neither  
7 denied or approved those applications.<sup>9</sup> Staff’s Motion should be denied because as long as Staff  
8 has not issued a final disposition regarding Dolly’s permit applications, Staff can indefinitely  
9 determine that Dolly has not complied with Order 04. This result would be both an illogical and  
10 unfair result.

11                                           **V.       CONCLUSION**

12           As reflected in Order 04, the Commission’s regulatory objective is to ensure that  
13 companies believed to fall within its jurisdiction comply with its regulatory scheme, including  
14 the receipt of initial authority to provide a needed service. The use of penalties to force  
15 compliance, as requested by Staff here, makes no sense under the circumstances presented and  
16 are clearly unnecessary to achieve the Commission’s objectives in Order 04. In the interest of  
17 fairness and propriety, Staff’s Motion should be denied for the reasons stated above.

18  
19           Dated this 19th of July, 2018.



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21           Armikka R. Bryant, WSBA No: 35765  
22           Director of Legal and Government Affairs  
23           Dolly, Inc.  
24           901 5th Avenue, Suite 600  
25           Seattle, Washington 98164-2086  
26           Office: 206-413-5312  
27           Fax: 833-817-6581  
28           Email: armikka@dolly.com  
29

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<sup>9</sup> See Attachment F.



Attachment A

**ATTACHMENT 1**  
Armikka Bryant <armikka@dolly.com>

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**Federal Motor Carrier Safety Administration Registration DOT Number**

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Armikka Bryant &lt;armikka@dolly.com&gt;

Mon, Mar 26, 2018 at 2:12 PM

To: transportation@utc.wa.gov

Hi,

I represent a company that is seeking to apply for a HHGC permit. It appears there are several kinds of DOT numbers/permits available from the Federal Motor Carrier Safety Administration Registration. Will you please let me know what kind of DOT permit we need to complete the HHGC application?

Thank you,

**Armikka Bryant****Dolly** | Director of Legal and Government Affairs

901 Fifth Avenue

Suite 600

Seattle, WA 98104-3188

[646.303.3533](tel:646.303.3533)[armikka@dolly.com](mailto:armikka@dolly.com)[dolly.com](http://dolly.com)

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# Attachment B

**ATTACHMENT 1**  
Armikka Bryant <armikka@dolly.com>

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## US DOT Number Licensing Question/Assistance

3 messages

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**Armikka Bryant** <armikka@dolly.com>  
To: sstillwe@utc.wa.gov

Tue, May 29, 2018 at 10:44 AM

Hi Suzanne,

I represent Dolly, Inc., a company that created and owns a proprietary software application that establishes a marketplace which connects people who need an item moved either within the same location or from one location to another location with people who have the capacity to move the item.

Dolly does not own any vehicles and the individuals who move the items are independent contractors, not employees.

However, we would like to apply for household goods carrier, common carrier, and solid waste collection permits. It appears we are required to have a US DOT number but we do not own, lease, or rent any trucks.

Are you able to assist us with completing the application, or do we not qualify due to the lack of the US DOT number?

Thank you,  
Armikka Bryant  
Dolly | Director of Legal and Government Affairs  
901 Fifth Avenue  
Suite 600  
Seattle, WA 98104-3188  
646.303.3533  
[armikka@dolly.com](mailto:armikka@dolly.com)  
[dolly.com](http://dolly.com)

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**Stillwell, Suzanne (UTC)** <suzanne.stillwell@utc.wa.gov>  
To: Armikka Bryant <armikka@dolly.com>  
Cc: "Dotson, Michael (UTC)" <michael.dotson@utc.wa.gov>

Tue, May 29, 2018 at 11:54 AM

Yes, please submit each industry application without a DOT number. Include a letter explaining the situation with each application. Sincerely, Suzanne Stillwell

**Suzanne Stillwell**

Licensing Services Manager

360-664-1224

[SStillwe@utc.wa.gov](mailto:SStillwe@utc.wa.gov)**ATTACHMENT 1****Utilities and Transportation Commission**

Respect. Professionalism. Integrity. Accountability.

[www.utc.wa.gov](http://www.utc.wa.gov)

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**From:** Armikka Bryant [mailto:[armikka@dolly.com](mailto:armikka@dolly.com)]  
**Sent:** Tuesday, May 29, 2018 10:45 AM  
**To:** Stillwell, Suzanne (UTC) <[suzanne.stillwell@utc.wa.gov](mailto:suzanne.stillwell@utc.wa.gov)>  
**Subject:** US DOT Number Licensing Question/Assistance

[Quoted text hidden]

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**Armikka Bryant** <[armikka@dolly.com](mailto:armikka@dolly.com)>  
To: "Stillwell, Suzanne (UTC)" <[suzanne.stillwell@utc.wa.gov](mailto:suzanne.stillwell@utc.wa.gov)>  
Cc: "Dotson, Michael (UTC)" <[michael.dotson@utc.wa.gov](mailto:michael.dotson@utc.wa.gov)>

Tue, May 29, 2018 at 11:54 AM

Thank you very much!

**Armikka Bryant**  
**Dolly** | Director of Legal and Government Affairs  
901 Fifth Avenue  
Suite 600  
Seattle, WA 98104-3188  
[646.303.3533](tel:646.303.3533)  
[armikka@dolly.com](mailto:armikka@dolly.com)  
[dolly.com](http://dolly.com)

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[Quoted text hidden]



# Attachment C

**ATTACHMENT 1**  
Armikka Bryant <armikka@dolly.com>

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## Application

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**Roberson, Jeff (UTC)** <jeff.roberson@utc.wa.gov>  
To: Armikka Bryant <armikka@dolly.com>

Tue, May 29, 2018 at 1:33 PM

Hey Armikka,

Suzanne Stillwell told me you had a question about applying for a permit. I asked her to convey that you needed to complete the application and send a letter explaining your circumstances. I looked a bit more into it, and, in the interest of saving Mike Dotson and you some emails, I'm going to direct you to some WACs: 480-07-110; 480-14-020, -180, and -250; 480-15-035, -186, -302, and -305; and WAC 480-70-006, and -091. I can't give you legal advice, but I can say that it looks like Dolly needs to request an exemption from some of the Commission's rules. The cites I just provided should get you started (I can't say the list is exhaustive, especially with solid waste).

Cheers,

Jeff



# Attachment D

**ATTACHMENT 1**  
Armikka Bryant <armikka@dolly.com>

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## UTC Permit Applications

---

**Barnett, Donna L. (Perkins Coie)** <DBarnett@perkinscoie.com>  
To: Armikka Bryant <armikka@dolly.com>

Tue, Jul 17, 2018 at 11:46 AM

I filed online in Docket 171212 using the web portal, so there is no email but I received the attached confirmation that it was received. I followed it up on Monday with payment, and that email is attached.

**Donna Barnett | Perkins Coie LLP**

**PARTNER**

10885 N.E. Fourth Street Suite 700

Bellevue, WA 98004-5579

1.425.635.1419

**PERKINS**coie

**From:** Armikka Bryant [mailto:[armikka@dolly.com](mailto:armikka@dolly.com)]  
**Sent:** Tuesday, July 17, 2018 10:34 AM  
**To:** Barnett, Donna L. (BEL) <[DBarnett@perkinscoie.com](mailto:DBarnett@perkinscoie.com)>  
**Subject:** UTC Permit Applications

[Quoted text hidden]

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NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

----- Forwarded message -----

From: Records Service Center <[Sharepointadmins@utc.wa.gov](mailto:Sharepointadmins@utc.wa.gov)>  
To: "Barnett, Donna L. (Perkins Coie)" <[DBarnett@perkinscoie.com](mailto:DBarnett@perkinscoie.com)>  
Cc:  
Bcc:  
Date: Fri, 6 Jul 2018 23:17:38 +0000

Subject: UTC Electronic Submission Received, Confirmation ID 10900

Your electronic submission has been received by the Washington Utilities and Transportation Commission. Please save this email, and reference the confirmation ID when contacting the Commission.

\* Please do not reply to this message. This is an automated message, and the originating account cannot receive emails.

Electronic submission details:

Confirmation ID: 10900

Docket No: TV-171212

Company: Dolly, Inc.

Filing Description: Application for Common Carrier and Household Goods Carrier Permit and related Petition for Exemption of Commission Rules

Documents Filed:

File Name: 171212 Dolly Appl HHG (7-6-18)(R).zip

Description: Application for Common Carrier and Household Goods Carrier Permit and related Petition for Exemption of

Commission Rules  
Confidentiality: None

Documents Filed:  
File Name: 171212 Dolly Appl HHG (7-6-18)(C).pdf  
Description: Application for Household Goods Carrier Permit  
Confidentiality: Confidential

Documents Filed:  
File Name: 171212 Dolly Appl HHG (7-6-18)(R).pdf  
Description: Redacted version of 171212 Dolly Appl HHG (7-6-18)(C).pdf  
Confidentiality: None

----- Forwarded message -----

From: "Barnett, Donna L. (Perkins Coie)" <DBarnett@perkinscoie.com>  
To: "transportation@utc.wa.gov" <transportation@utc.wa.gov>  
Cc: "Weis, Amanda (Perkins Coie)" <AWeis@perkinscoie.com>  
Bcc:

Date: Mon, 9 Jul 2018 20:24:43 +0000

Subject: CONFIDENTIAL per WAC 480-07-160 TV-171212 - CC and HHGC applications

Attached please find applications for a common carrier and household goods carrier permits in behalf of Dolly, Inc. Please also note that the attached applications, as well as the following documents (also attached), were filed last week in the above-referenced docket and payment has been made via the Commission's website:

1. Filing letter,
2. Application for Household Goods Carrier permit, with exhibits,
3. Application for Common Carrier permit,
4. Petition for Exemption of Commission Rules, and
5. Cert. of Service

Please note the attached contains information designated as confidential per WAC 480-07-160 on the basis that it contains valuable commercial information, including trade secrets or confidential marketing, cost, or financial information.

Please contact me if you have any questions.

Sincerely,

Donna Barnett

Donna Barnett | Perkins Coie LLP

PARTNER

10885 N.E. Fourth Street Suite 700

Bellevue, WA 98004-5579

1.425.635.1419

E. <<mailto:%20AWeis@perkinscoie.com>> [AWeis@perkinscoie.com](mailto:AWeis@perkinscoie.com)

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**8 attachments**

-  **noname.eml**  
3K
-  **171212 Dolly Letter (7-6-18).pdf**  
602K
-  **171212 Dolly Pet-Exmpt (7-6-18).pdf**  
161K
-  **171212 Dolly Appl CC (7-6-18).pdf**  
602K
-  **171212 Dolly Appl HHG (7-6-18)(C).pdf**  
3539K
-  **171212 Dolly Appl HHG (7-6-18)(R).pdf**  
2340K
-  **171212 Dolly COS (7-6-18).pdf**  
83K
-  **noname.eml**  
10035K



# Attachment E

**ATTACHMENT 1**

Armikka Bryant &lt;armikka@dolly.com&gt;

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**FW: CONFIDENTIAL per WAC 480-07-160 TV-171212 - CC and HHGC applications**

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**Barnett, Donna L. (Perkins Coie)** <DBarnett@perkinscoie.com>

Tue, Jul 10, 2018 at 12:56 PM

To: "Armikka Bryant (armikka@dolly.com)" &lt;armikka@dolly.com&gt;

See below, especially regarding confidentiality. Although it appears anyone can file confidential information per RCW 80.04.095, the Commission has treated transportation and solid waste companies different than other companies and have not let them file confidential information. We've argued about this at bench bar conferences, and while I don't think they are legally correct, they have nonetheless treated these companies differently. We can try to get a protective order, but that will likely be denied. We can pursue a court order so it would be protected from the PRA under 42.56.270, but that will take time and could also be denied. We could also withdraw the application if it is a deal breaker, and Mike says he'll wait to hear from us before he posts it.

**Donna Barnett | Perkins Coie LLP****PARTNER**

10885 N.E. Fourth Street Suite 700

Bellevue, WA 98004-5579

1.425.635.1419

**PERKINS**coie

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**From:** Dotson, Michael (UTC) [mailto:michael.dotson@utc.wa.gov]**Sent:** Tuesday, July 10, 2018 12:09 PM**To:** Barnett, Donna L. (BEL) <DBarnett@perkinscoie.com>**Cc:** Weis, Amanda (BEL) <AWeis@perkinscoie.com>**Subject:** RE: CONFIDENTIAL per WAC 480-07-160 TV-171212 - CC and HHGC applications

Hello Donna, thank you for your application. A couple of things before I get it going. First off, you actually will receive Common Carrier authority with your Household Goods Moving permit, so you do not need to separately apply. If you would like separate permits that's fine, but it is not necessary. I can refund your \$275 payment for that one, just let me know how you would like to proceed.

Additionally, per WAC 480-07-160 only Solid Waste companies may submit confidential documents, so your household goods application will be available, in full, on our public website once it is docketed. The only thing we would redact would be personally identifiable information, which currently there is none of in the application.

Thanks, let me know if you have any questions. I will wait for your response before I file the application publically.

Mike Dotson

Transportation Specialist 3

Licensing Services

Washington Utilities and Transportation Commission

**ATTACHMENT 1**

PH: 360-664-1223

FAX: 360-586-1181

---

**From:** Barnett, Donna L. (Perkins Coie) [<mailto:DBarnett@perkinscoie.com>]  
**Sent:** Monday, July 9, 2018 1:25 PM  
**To:** UTC DL Transportation <[transportation@utc.wa.gov](mailto:transportation@utc.wa.gov)>  
**Cc:** Weis, Amanda (Perkins Coie) <[AWeis@perkinscoie.com](mailto:AWeis@perkinscoie.com)>  
**Subject:** CONFIDENTIAL per WAC 480-07-160 TV-171212 - CC and HHGC applications

Attached please find applications for a common carrier and household goods carrier permits in behalf of Dolly, Inc. Please also note that the attached applications, as well as the following documents (also attached), were filed last week in the above-referenced docket and payment has been made via the Commission's website:

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4. Petition for Exemption of Commission Rules, and
5. Cert. of Service

**Please note the attached contains information designated as confidential per WAC 480-07-160 on the basis that it contains valuable commercial information, including trade secrets or confidential marketing, cost, or financial information.**

Please contact me if you have any questions.

Sincerely,

Donna Barnett

**Donna Barnett | Perkins Coie LLP**

**PARTNER**

10885 N.E. Fourth Street Suite 700

Bellevue, WA 98004-5579

1.425.635.1419

**PERKINS**coie

E. [AWeis@perkinscoie.com](mailto:AWeis@perkinscoie.com)



**ATTACHMENT 1**

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

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NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.



# Attachment F

**ATTACHMENT 1**

Armikka Bryant &lt;armikka@dolly.com&gt;

---

## Notice of Deficient Household Goods moving permit application - Dolly Apple Inc./Dolly Inc.

---

Dotson, Michael (UTC) &lt;michael.dotson@utc.wa.gov&gt;

Wed, Jul 18, 2018 at 2:32 PM

To: "armikka@dolly.com" &lt;armikka@dolly.com&gt;

July 17, 2018

Dolly Inc.

Dolly Apple Inc.

901 5th Ave, Suite 600

Seattle, WA 98164

**Re: Notice of Deficient Application**

Docket # TV-180605

Dear Dolly Apple Inc.:

The following items need to be completed and/or corrected for prompt processing of your application for operating authority. Please address these issues and return the application, with any additional materials necessary, to the Commission by August 17, 2018. You may not operate until these issues are resolved and you have received your approved permit.

- The UBI number you provided on your application is for "Dolly Inc." "Dolly Apple Inc." has a UBI number as well, and a registration with the Secretary of State, but does not appear to have an active business license. Please either correct the application to reflect Dolly, Inc. as the applicant or contact Business Licensing Services/DOR at 1-800-451-7985 or [www.bls.dor.wa.gov](http://www.bls.dor.wa.gov) and obtain a business license for Dolly Apple Inc.. If Dolly Apple Inc. is the applicant, please supplement Mr. Bryant's letter of July 13, 2018, to provide evidence that Dolly Apple Inc. has the financial resources to operate a moving company.

- You requested exemptions from a number of rules. Per WAC 480-07-110(2)(1) please provide a full explanation of the reason for requesting the exemption for each specific rule, not including the requests for exemptions from the regulations found in chapter 480-14 WAC, which have been rendered moot by the withdrawal of your application for a Common Carrier permit.

**Who do I contact if I have questions?**

**ATTACHMENT 1**

You may call 360-664-1222 or e-mail us at [transportation@utc.wa.gov](mailto:transportation@utc.wa.gov). Our fax number is 360-586-1181.

Thank you,

Licensing Services

Washington Utilities and Transportation Commission

## Mitigation form WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

### APPLICATION FOR MITIGATION OF PENALTIES – TV-171212

1. I have read and understand RCW 9A.72.020, which states that making false statements under oath is a class B felony (printed below). I am over the age of 18, am competent to testify to the matters set forth below and I have personal knowledge of those matters. I hereby make, under oath, application for mitigation of the penalties, for the following reasons:

#### 1. Dolly Has Acted in Good Faith to Comply with Order 04

2. The Commission has repeatedly stated that its “ultimate objective in any enforcement action is to obtain compliance with applicable law.” See *WUTC v. CenturyLink*, Docket UT-140597, Order 03, Final Order Approving Settlement Agreement ¶ 10 (Feb. 22, 2016); accord, e.g., *WUTC v. Ride the Ducks*, Docket TE-151906, Order 08, Order Approving Settlement Agreement with Conditions ¶ 8 (May 3, 2016).
3. Dolly has sought to comply with Commission laws and rules without the need to impose or enforce penalties. This is evidenced by its many communications with Commission Licensing Staff which culminated in Dolly submitting applications to obtain operating authority from the Commission. See *Dolly Inc. - Application for Household Goods Moving Authority*, Docket TV-180605 (July 17, 2018). Commission Licensing Staff is still in the process of reviewing Dolly’s operating authority permit application.
- #### 2. A Penalty is Not Necessary to Compel Compliance with Order 04
4. In Docket A-120061 the Commission states that, “Generally, the company would request mitigation if it agrees the violations occurred, but believes circumstances exist to warrant a lesser penalty” See Docket A-120061, Other Order, Enforcement Policy of the Washington Utilities and Transportation Commission ¶ 19 (January 4, 2013). The Policy states the Commission will consider whether, “the company explains other circumstances that convince the Commission that a lesser penalty will be equally or more effective in ensuring compliance by the company with applicable statutory and regulatory requirements.” *Id.*

**A. Compliance With Order 04 Has Been A Complicated Process That Began in March 2018**

5. Well before Order 04 was even filed, Dolly inquired about the Commission’s permitting process on March 26, 2018,<sup>1</sup> and again on May 29.<sup>2</sup> Also on May 29, 2108 Commission Staff Assistant Attorney General (“AAG”) Jeffrey Roberson followed-up with Dolly to provide advice regarding the permit application process.<sup>3</sup> This advice included recommending that Dolly “request an exemption from some of the Commission’s rules” that AAG Roberson believes do not apply to Dolly’s business model. *Id.* While Dolly appreciated AAG Roberson’s gesture, it nevertheless acknowledges the complications inherent with Dolly complying with Order 04.

**B. Dolly Has Not Been Granted Sufficient Time to Obtain Operating Permits Before Imposing Penalties**

6. As evidenced by AAG Roberson’s communication with Dolly, Dolly’s permit application process was atypical. This additional complexity demanded more time than Dolly anticipated to complete the application. Dolly submitted applications for operating permits to Commission Staff on July 6.<sup>4</sup> The penalties, if enforced, would have the effect of punishing Dolly for the complicated application process expressly acknowledged by AAG Roberson. Commission Staff also clearly recognized Dolly’s application process would take more time than the ten days Order 04 allowed because their investigation did not begin until June 15 and continued until July 10.

**C. Commission Licensing Staff Has Not Been Granted Sufficient Time to Review Dolly’s Permit Applications**

7. Since the Commission issued Order 04, Dolly has filed household goods and common carrier permit applications with the Commission; exactly what Order 04 requests even though Commission Licensing Division staff now assert that Dolly is not required to obtain a common carrier permit.<sup>5</sup> Dolly began compliance with Order 04 within the timeframe the Order permits and has worked diligently towards that end since then. As of the date of this filing, Dolly’s

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<sup>1</sup> See Attachment A dated March 26, 2018: Email to Commission Licensing Services Division requesting guidance regarding the application permit process.

<sup>2</sup> See Attachment B dated May 29, 2018: Email to Commission Licensing Services Division requesting guidance regarding the application permit process.

<sup>3</sup> See Attachment C dated May 29, 2018: Email from AAG Mr. Jeffrey Roberson suggesting that Dolly request exemptions from specific regulations.

<sup>4</sup> See Attachment D.

<sup>5</sup> See Attachment E dated July 10, 2018: Email from Mr. Michael Dotson informing Dolly’s counsel that Dolly, “will receive Common Carrier authority with [a] Household Goods Moving permit.”

permit applications have been submitted and are currently under review by the Commission's Licensing Services Division. In fact, the Commission has allowed Dolly until August 18, 2018, to provide additional information supporting its application.<sup>6</sup> Dolly submitted its revised application early on August 11.

8. There is no question that Dolly is working diligently and in full cooperation with Staff to perfect its current application and to obtain the authority required by the Commission. Under these circumstances, it appears that Staff's Motion is seeking to punish Dolly for exercising its right to contest Staff's earlier assertion of regulatory jurisdiction over Dolly's business activities; it certainly is not necessary to force compliance. Dolly and the Commission's Licensing Staff are working cooperatively and should conclude the licensing process within the timeline proposed by Commission Licensing Staff.<sup>7</sup>

**Conclusion**

9. The Commission controlled the timeline for Dolly's compliance with Order 04 from the moment Dolly finalized its applications for operating authority on July 9. As of the date of this filing, the Commission's Licensing Division has not made a final determination regarding the disposition of Dolly's permit application.<sup>8</sup> Imposing penalties without mitigation is contrary to the Commission's objective of obtaining compliance with applicable law. This result would be both an illogical and unfair result.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated: August 20, 2018, at Seattle, Washington



Armikka R. Bryant, WSBA No: 35765

---

<sup>6</sup> See Attachment F dated July 18, 2018: Email from Mr. Michael Dotson Dolly notifying Dolly that its application was under review and required clarification in two areas; the relationship between the application's UBI number and corporate name and justification for specific requests for waivers from Commission rules.

<sup>7</sup> See Attachment F.

<sup>8</sup> See Attachment F.

Director of Legal and Government Affairs Dolly, Inc.  
901 5th Avenue, Suite 600  
Seattle, Washington 98164-2086  
Office: 206-413-5312  
Fax: 833-817-6581  
Email: armikka@dolly.com

RCW 9A.72.020:

“Perjury in the first degree. (1) A person is guilty of perjury in the first degree in any official proceeding he makes a materially false statement which he knows to be false under an oath required or authorized by law. (2) Knowledge of the materiality of the statement is not an element of this crime, and the actor’s mistaken belief that his statement was not material is not a defense to a prosecution under this section. (3) Perjury in the first degree is a class B felony.”



Attachment A

**ATTACHMENT 2**  
Armikka Bryant <armikka@dolly.com>

---

**Federal Motor Carrier Safety Administration Registration DOT Number**

---

Armikka Bryant &lt;armikka@dolly.com&gt;

Mon, Mar 26, 2018 at 2:12 PM

To: transportation@utc.wa.gov

Hi,

I represent a company that is seeking to apply for a HHGC permit. It appears there are several kinds of DOT numbers/permits available from the Federal Motor Carrier Safety Administration Registration. Will you please let me know what kind of DOT permit we need to complete the HHGC application?

Thank you,

**Armikka Bryant****Dolly** | Director of Legal and Government Affairs

901 Fifth Avenue

Suite 600

Seattle, WA 98104-3188

[646.303.3533](tel:646.303.3533)[armikka@dolly.com](mailto:armikka@dolly.com)[dolly.com](http://dolly.com)

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# Attachment B

**ATTACHMENT 2**  
Armikka Bryant <armikka@dolly.com>

---

## US DOT Number Licensing Question/Assistance

3 messages

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**Armikka Bryant** <armikka@dolly.com>  
To: sstillwe@utc.wa.gov

Tue, May 29, 2018 at 10:44 AM

Hi Suzanne,

I represent Dolly, Inc., a company that created and owns a proprietary software application that establishes a marketplace which connects people who need an item moved either within the same location or from one location to another location with people who have the capacity to move the item.

Dolly does not own any vehicles and the individuals who move the items are independent contractors, not employees.

However, we would like to apply for household goods carrier, common carrier, and solid waste collection permits. It appears we are required to have a US DOT number but we do not own, lease, or rent any trucks.

Are you able to assist us with completing the application, or do we not qualify due to the lack of the US DOT number?

Thank you,  
Armikka Bryant  
Dolly | Director of Legal and Government Affairs  
901 Fifth Avenue  
Suite 600  
Seattle, WA 98104-3188  
646.303.3533  
[armikka@dolly.com](mailto:armikka@dolly.com)  
[dolly.com](http://dolly.com)

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---

**Stillwell, Suzanne (UTC)** <suzanne.stillwell@utc.wa.gov>  
To: Armikka Bryant <armikka@dolly.com>  
Cc: "Dotson, Michael (UTC)" <michael.dotson@utc.wa.gov>

Tue, May 29, 2018 at 11:54 AM

Yes, please submit each industry application without a DOT number. Include a letter explaining the situation with each application. Sincerely, Suzanne Stillwell

**Suzanne Stillwell**

Licensing Services Manager

360-664-1224

[SStillwe@utc.wa.gov](mailto:SStillwe@utc.wa.gov)**ATTACHMENT 2****Utilities and Transportation Commission**

Respect. Professionalism. Integrity. Accountability.

[www.utc.wa.gov](http://www.utc.wa.gov)

---

**From:** Armikka Bryant [mailto:[armikka@dolly.com](mailto:armikka@dolly.com)]  
**Sent:** Tuesday, May 29, 2018 10:45 AM  
**To:** Stillwell, Suzanne (UTC) <[suzanne.stillwell@utc.wa.gov](mailto:suzanne.stillwell@utc.wa.gov)>  
**Subject:** US DOT Number Licensing Question/Assistance

[Quoted text hidden]

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**Armikka Bryant** <[armikka@dolly.com](mailto:armikka@dolly.com)>  
To: "Stillwell, Suzanne (UTC)" <[suzanne.stillwell@utc.wa.gov](mailto:suzanne.stillwell@utc.wa.gov)>  
Cc: "Dotson, Michael (UTC)" <[michael.dotson@utc.wa.gov](mailto:michael.dotson@utc.wa.gov)>

Tue, May 29, 2018 at 11:54 AM

Thank you very much!

**Armikka Bryant**  
**Dolly** | Director of Legal and Government Affairs  
901 Fifth Avenue  
Suite 600  
Seattle, WA 98104-3188  
[646.303.3533](tel:646.303.3533)  
[armikka@dolly.com](mailto:armikka@dolly.com)  
[dolly.com](http://dolly.com)

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[Quoted text hidden]



# Attachment C

**ATTACHMENT 2**  
Armikka Bryant <armikka@dolly.com>

---

## Application

---

**Roberson, Jeff (UTC)** <jeff.roberson@utc.wa.gov>  
To: Armikka Bryant <armikka@dolly.com>

Tue, May 29, 2018 at 1:33 PM

Hey Armikka,

Suzanne Stillwell told me you had a question about applying for a permit. I asked her to convey that you needed to complete the application and send a letter explaining your circumstances. I looked a bit more into it, and, in the interest of saving Mike Dotson and you some emails, I'm going to direct you to some WACs: 480-07-110; 480-14-020, -180, and -250; 480-15-035, -186, -302, and -305; and WAC 480-70-006, and -091. I can't give you legal advice, but I can say that it looks like Dolly needs to request an exemption from some of the Commission's rules. The cites I just provided should get you started (I can't say the list is exhaustive, especially with solid waste).

Cheers,

Jeff



# Attachment D

**ATTACHMENT 2**  
Armikka Bryant <armikka@dolly.com>

---

## UTC Permit Applications

---

**Barnett, Donna L. (Perkins Coie)** <DBarnett@perkinscoie.com>  
To: Armikka Bryant <armikka@dolly.com>

Tue, Jul 17, 2018 at 11:46 AM

I filed online in Docket 171212 using the web portal, so there is no email but I received the attached confirmation that it was received. I followed it up on Monday with payment, and that email is attached.

**Donna Barnett | Perkins Coie LLP**

**PARTNER**

10885 N.E. Fourth Street Suite 700

Bellevue, WA 98004-5579

1.425.635.1419

**PERKINS**coie

**From:** Armikka Bryant [mailto:[armikka@dolly.com](mailto:armikka@dolly.com)]  
**Sent:** Tuesday, July 17, 2018 10:34 AM  
**To:** Barnett, Donna L. (BEL) <[DBarnett@perkinscoie.com](mailto:DBarnett@perkinscoie.com)>  
**Subject:** UTC Permit Applications

[Quoted text hidden]

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----- Forwarded message -----

From: Records Service Center <[Sharepointadmins@utc.wa.gov](mailto:Sharepointadmins@utc.wa.gov)>  
To: "Barnett, Donna L. (Perkins Coie)" <[DBarnett@perkinscoie.com](mailto:DBarnett@perkinscoie.com)>  
Cc:  
Bcc:  
Date: Fri, 6 Jul 2018 23:17:38 +0000

Subject: UTC Electronic Submission Received, Confirmation ID 10900

Your electronic submission has been received by the Washington Utilities and Transportation Commission. Please save this email, and reference the confirmation ID when contacting the Commission.

\* Please do not reply to this message. This is an automated message, and the originating account cannot receive emails.

Electronic submission details:

Confirmation ID: 10900

Docket No: TV-171212

Company: Dolly, Inc.

Filing Description: Application for Common Carrier and Household Goods Carrier Permit and related Petition for Exemption of Commission Rules

Documents Filed:

File Name: 171212 Dolly Appl HHG (7-6-18)(R).zip

Description: Application for Common Carrier and Household Goods Carrier Permit and related Petition for Exemption of

Commission Rules  
Confidentiality: None

Documents Filed:  
File Name: 171212 Dolly Appl HHG (7-6-18)(C).pdf  
Description: Application for Household Goods Carrier Permit  
Confidentiality: Confidential

Documents Filed:  
File Name: 171212 Dolly Appl HHG (7-6-18)(R).pdf  
Description: Redacted version of 171212 Dolly Appl HHG (7-6-18)(C).pdf  
Confidentiality: None

----- Forwarded message -----

From: "Barnett, Donna L. (Perkins Coie)" <DBarnett@perkinscoie.com>  
To: "transportation@utc.wa.gov" <transportation@utc.wa.gov>  
Cc: "Weis, Amanda (Perkins Coie)" <AWeis@perkinscoie.com>  
Bcc:

Date: Mon, 9 Jul 2018 20:24:43 +0000

Subject: CONFIDENTIAL per WAC 480-07-160 TV-171212 - CC and HHGC applications

Attached please find applications for a common carrier and household goods carrier permits in behalf of Dolly, Inc. Please also note that the attached applications, as well as the following documents (also attached), were filed last week in the above-referenced docket and payment has been made via the Commission's website:

1. Filing letter,
2. Application for Household Goods Carrier permit, with exhibits,
3. Application for Common Carrier permit,
4. Petition for Exemption of Commission Rules, and
5. Cert. of Service

Please note the attached contains information designated as confidential per WAC 480-07-160 on the basis that it contains valuable commercial information, including trade secrets or confidential marketing, cost, or financial information.

Please contact me if you have any questions.

Sincerely,

Donna Barnett

Donna Barnett | Perkins Coie LLP

PARTNER

10885 N.E. Fourth Street Suite 700

Bellevue, WA 98004-5579

1.425.635.1419

E. <<mailto:%20AWeis@perkinscoie.com>> [AWeis@perkinscoie.com](mailto:AWeis@perkinscoie.com)

---

**8 attachments**

-  **noname.eml**  
3K
-  **171212 Dolly Letter (7-6-18).pdf**  
602K
-  **171212 Dolly Pet-Exmpt (7-6-18).pdf**  
161K
-  **171212 Dolly Appl CC (7-6-18).pdf**  
602K
-  **171212 Dolly Appl HHG (7-6-18)(C).pdf**  
3539K
-  **171212 Dolly Appl HHG (7-6-18)(R).pdf**  
2340K
-  **171212 Dolly COS (7-6-18).pdf**  
83K
-  **noname.eml**  
10035K



# Attachment E

**ATTACHMENT 2**  
Armikka Bryant <armikka@dolly.com>

---

**FW: CONFIDENTIAL per WAC 480-07-160 TV-171212 - CC and HHGC applications**

---

**Barnett, Donna L. (Perkins Coie)** <DBarnett@perkinscoie.com>  
To: "Armikka Bryant (armikka@dolly.com)" <armikka@dolly.com>

Tue, Jul 10, 2018 at 12:56 PM

**Donna Barnett | Perkins Coie LLP**

**PARTNER**

10885 N.E. Fourth Street Suite 700

Bellevue, WA 98004-5579

1.425.635.1419

**PERKINS**coie

---

**From:** Dotson, Michael (UTC) [mailto:[michael.dotson@utc.wa.gov](mailto:michael.dotson@utc.wa.gov)]

**Sent:** Tuesday, July 10, 2018 12:09 PM

**To:** Barnett, Donna L. (BEL) <[DBarnett@perkinscoie.com](mailto:DBarnett@perkinscoie.com)>

**Cc:** Weis, Amanda (BEL) <[AWeis@perkinscoie.com](mailto:AWeis@perkinscoie.com)>

**Subject:** RE: CONFIDENTIAL per WAC 480-07-160 TV-171212 - CC and HHGC applications

Hello Donna, thank you for your application. A couple of things before I get it going. First off, you actually will receive Common Carrier authority with your Household Goods Moving permit, so you do not need to separately apply. If you would like separate permits that's fine, but it is not necessary. I can refund your \$275 payment for that one, just let me know how you would like to proceed.

Additionally, per WAC 480-07-160 only Solid Waste companies may submit confidential documents, so your household goods application will be available, in full, on our public website once it is docketed. The only thing we would redact would be personally identifiable information, which currently there is none of in the application.

Thanks, let me know if you have any questions. I will wait for your response before I file the application publically.

Mike Dotson

Transportation Specialist 3

Licensing Services

Washington Utilities and Transportation Commission

**ATTACHMENT 2**

PH: 360-664-1223

FAX: 360-586-1181

---

**From:** Barnett, Donna L. (Perkins Coie) [<mailto:DBarnett@perkinscoie.com>]  
**Sent:** Monday, July 9, 2018 1:25 PM  
**To:** UTC DL Transportation <[transportation@utc.wa.gov](mailto:transportation@utc.wa.gov)>  
**Cc:** Weis, Amanda (Perkins Coie) <[AWeis@perkinscoie.com](mailto:AWeis@perkinscoie.com)>  
**Subject:** CONFIDENTIAL per WAC 480-07-160 TV-171212 - CC and HHGC applications

Attached please find applications for a common carrier and household goods carrier permits in behalf of Dolly, Inc. Please also note that the attached applications, as well as the following documents (also attached), were filed last week in the above-referenced docket and payment has been made via the Commission's website:

1. Filing letter,
2. Application for Household Goods Carrier permit, with exhibits,
3. Application for Common Carrier permit,
4. Petition for Exemption of Commission Rules, and
5. Cert. of Service

**Please note the attached contains information designated as confidential per WAC 480-07-160 on the basis that it contains valuable commercial information, including trade secrets or confidential marketing, cost, or financial information.**

Please contact me if you have any questions.

Sincerely,

Donna Barnett

**Donna Barnett | Perkins Coie LLP**

**PARTNER**

10885 N.E. Fourth Street Suite 700

Bellevue, WA 98004-5579

1.425.635.1419

**PERKINS**coie

E. [AWeis@perkinscoie.com](mailto:AWeis@perkinscoie.com)



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# Attachment F

**ATTACHMENT 2**

Armikka Bryant &lt;armikka@dolly.com&gt;

---

## Notice of Deficient Household Goods moving permit application - Dolly Apple Inc./Dolly Inc.

---

Dotson, Michael (UTC) &lt;michael.dotson@utc.wa.gov&gt;

Wed, Jul 18, 2018 at 2:32 PM

To: "armikka@dolly.com" &lt;armikka@dolly.com&gt;

July 17, 2018

Dolly Inc.

Dolly Apple Inc.

901 5th Ave, Suite 600

Seattle, WA 98164

**Re: Notice of Deficient Application**

Docket # TV-180605

Dear Dolly Apple Inc.:

The following items need to be completed and/or corrected for prompt processing of your application for operating authority. Please address these issues and return the application, with any additional materials necessary, to the Commission by August 17, 2018. You may not operate until these issues are resolved and you have received your approved permit.

- The UBI number you provided on your application is for "Dolly Inc." "Dolly Apple Inc." has a UBI number as well, and a registration with the Secretary of State, but does not appear to have an active business license. Please either correct the application to reflect Dolly, Inc. as the applicant or contact Business Licensing Services/DOR at 1-800-451-7985 or [www.bls.dor.wa.gov](http://www.bls.dor.wa.gov) and obtain a business license for Dolly Apple Inc.. If Dolly Apple Inc. is the applicant, please supplement Mr. Bryant's letter of July 13, 2018, to provide evidence that Dolly Apple Inc. has the financial resources to operate a moving company.

- You requested exemptions from a number of rules. Per WAC 480-07-110(2)(1) please provide a full explanation of the reason for requesting the exemption for each specific rule, not including the requests for exemptions from the regulations found in chapter 480-14 WAC, which have been rendered moot by the withdrawal of your application for a Common Carrier permit.

**Who do I contact if I have questions?**

**ATTACHMENT 2**

You may call 360-664-1222 or e-mail us at [transportation@utc.wa.gov](mailto:transportation@utc.wa.gov). Our fax number is 360-586-1181.

Thank you,

Licensing Services

Washington Utilities and Transportation Commission