



Washington Movers Conference

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June 12, 2023

Received
Records Management
Jun 12, 2023

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE Lacey, WA 98503

Re: Inquiry to determine the appropriateness of updates to Tariff 15-C, Dockets TV-210535 and TV-210812 (consolidated)

Dear Ms Maxwell:

As you have likely expected, the Washington Movers Conference is not pleased with the foregoing reference. See the following comments -

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, i.e. Clean up of trash, completing required paperwork, and an out briefing with the customer to include obtaining signatures.

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?

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. Overtime is a customer request. HHG carriers will need to make adjustments to their crew work schedules. An addendum to the Estimated Cost for Services will need to be prepared and the signature of the customer must be obtained. All this work effort takes time.

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. Overtime is a customer request. HHG carriers will need to make adjustments to their crew work schedules. An addendum to the Estimated Cost for Services will need to be prepared and the signature of the customer must be obtained. All this work effort takes time. Plus it is difficult enough to get an employee to come in on a Saturday, Sunday, or Holiday for just 4-hours of work let alone any time less than 4-hours.

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

FORM

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.

Finally, **Additional WMC Concern:** Based on inflation, the additional work requirements contained in the UTC's proposed changes, continuing changes to state Agency regulations and/or those being proposed, particularly from the Departments of Ecology and Labor & Industries, the obvious recent fuel cost increases now and likely coming due to an OPEC announcement of a freeze on oil exports reported recently; those increases coming from

the ongoing auctions of Carbon Credits, and the fact the Washington State intrastate moving industry is openly competitive, the UTC needs to reconsider the WMC proposed change contained in UTC Docket TV-210812 and remove the Maximum Rate Band from the Intrastate HHG Tariff No. 15-C. Plus when a change to a Tariff Rate ITEM occurs, it takes an inordinate amount of time to approve a rate increase or decrease as appropriate. Intrastate HHG carrier leadership is fully capable of understanding their rates to be charged to allow their business to stay in business. There is **no** price gouging by professional Intrastate HHG relocation businesses!

Thank you for the opportunity to provide these written comments to the referenced UTC dockets for your consideration. It is sincerely hoped these comments and those you will likely receive from regulated, professional and hard working intrastate HHG carriers properly operating their businesses in this labor intensive industry, will provide the UTC staff with additional insight on how the Intrastate HHG Moving Industry provides safe and efficient HHG relocations day after day within Washington State.

Sincerely,

A handwritten signature in black ink, appearing to read "J.R. Tutton, Jr.", with a large, stylized flourish at the end.

James R. Tutton, Jr.
Executive Director