

TV-210812
TV-210535



1770 NE Fuson Road
Bremerton, WA 98311

Re: TV-210535 and TV-210812

Received
Records Management
Jun 12, 2023

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I have multiple concerns as a moving company licensed in the state of Washington regarding the revisions to HHG Tariff 15-C

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.”*

Concern: In the tariff this rule already exists:

“The customer is not required to pay more than 125 percent of the estimate regardless of the total cost unless the carrier issues and the customer accepts a supplemental estimate”. The proposed “ Language”is just adding another layer that is unnecessary.

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

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? This would limit the services a company would be willing to provide if they cannot charge appropriated rates based on the customer’s request.

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.”*

Concern: On what document?

ITEM 90, para 9b - Carrier Liability for Household Goods and Customer Valuation

Options. Proposed by the UTC staff: *“Depreciated Replacement Cost Coverage with Deductible. This option provides full, **depreciated**, value coverage less a \$300 deductible.”*

Concern: Who is responsible for determining the **depreciated** value of any damaged or lost item?

ITEM 90, para 9c- Carrier Liability for Household Goods and Customer Valuation Options, para 9c.

Proposed by the UTC staff: *“Depreciated Replacement Cost Coverage with no Deductible. This option provides the **fully depreciated**, value replacement coverage for the customer and a maximum carrier liability up to the declared value or \$5.00 times the net weight of the shipment, whichever is greater.*

Concern: There is no need to add back in “Depreciated Value Coverage”. The tariff allows for Replacement value with or without a deductible. Depreciated value options have been removed from the interstate portions of moving for the reason that customers were very dissatisfied with settlements based on depreciated value. It’s very hard to establish depreciated valued, how is this going to be determined?

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.”*

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.*

Concern: Where will the HHG carrier find space on the current 8” x 14” HHG Bill of Lading? Why is this language being added? What consumer benefit is it servicing? This does not appear to be any protection for the consumer, just more work for the moving company.

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.*

Concern: I disagree with the one minute option however, are companies restricted to just one form of time keeping? Can a company submit to both time keeping methods?

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:*

_____.

Concern: The One hour minimum should stand as it is currently written. A company is free to use the minimum rates to lower the price of the one hour minimum requirement if they so choose.

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:* _____.

Concern: Four hours should remain the minimum. Today you have to guarantee employees four hours of paid time. If a company wants to lower the cost for the customer they are free to use the lower band of the rates to adjust the cost to the customer.

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: _____

Concern: Are companies restricted to just one form of time keeping? Why would we have to choose just one method of time keeping?

Additional Concern: With the current economy based on inflation, the additional work requirements contained in the UTC's proposed changes, recent changes to state regulations or being proposed, particularly from the Departments of Ecology and Labor & Industries and the obvious recent fuel cost increases now and likely coming due to an OPEC announcement of a freeze on oil exports reported recently; the UTC proposed changes based on their review should include a 25% overall Rate Increase not 12.1% as recommended by the UTC staff.

Why should regulated companies that operating by this tariff have to change the way we do business for **ONE** company? Seems if the company wants to operate as moving company they need to comply with the rules, not expect everyone else to change the way they do business to accommodate just **ONE** company.

Another option would be to regulate a company like Clutter under a separate section of the tariff since their business model is different than a traditional moving & storage company?

Sincerely,

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