



Washington Movers Conference

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James R. Tutton, Jr.
Executive Director

October 13, 2021

Ms. Amanda Maxwell
Executive Director and Secretary
Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Dear Ms. Maxwell,

Reference: TG-210535 Petition to open Tariff 15-C for revision and for exemption from specific provisions of Tariff 15-C and WAC 480-15 pending the revision of Tariff 15-C.

On July 2, 2021 Clutter, Inc. filed with the Washington Utilities and Transportation Commission (UTC) a petition to Revise HHG Tariff No. 15-C and for temporary exemption from certain provisions of WAC 480-15 and HHG Tariff No. 15-C.

On August 30, 2021 Clutter filed a petition removing items from the original petition which had caused concern with UTC staff.

Now in one day, October 14, 2021 the UTC will have an Open Meeting to approve or deny the Clutter Inc. Petition.

The Washington Movers Conference (WMC) strongly opposes this Petition for the following reasons:

1. The WMC was NOT included in any discussions related to this Petition now being presented to the Commissioners with a recommendation for approval by the UTC staff.
2. The intrastate HHG moving industry regularly provides storage service IAW HHG Tariff No. 15-C ITEM 100 for **Temporary Storage**, storage of consumers goods related to a HHG relocation for 90 days or less; **Permanent Storage** for more than 90 days; and **Storage in the Vehicle**, temporary storage of a shipment that remains on or in the carrier's vehicle (van or trailer) instead of being placed in a warehouse. The customer may request, and the carrier may offer such service at the customer's approval.
3. It is believed that Clutter Inc. does not understand HHG Tariff No. 15-C ITEM 102 **Small Goods Transportation and Storage**. This ITEM was generated with mutual discussion between several storage businesses, the UTC staff, and the WMC to accommodate customers need for storage of a limited number of small HHG items and timely return of the items based on the customer's request. Small items are considered summer sports items like golf clubs, surf boards; Christmas decorations used only a limited time each year; college student's items when home for the summer; etc.

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4. UTC intrastate Tariff No. 15-C ITEM 230 Hourly Rates provides for compensatory rates for moving companies to provide requested services to their customers. Anything less would be non-compensatory taking into consideration current employee, vehicle, and equipment costs. Clutter Inc. wants to charge anyone of three fees - a Flat Fee for transportation; an hourly fee for labor based on a storage plan; and a flat rate per item going into storage in addition to their unregulated monthly storage fee.
5. Clutter Inc. wants to change the definition of Permanent Storage to 30 days vice 90 days as is now the case. In today's UTC HHG Tariff No.15-C, 90 days is not a mandatory storage time. If the customer is ready to receive their goods in less than 90 days, that is perfectly OK. If they need an additional 90 days, that is OK too. The customer would be charged for storage in 30 day increments.

Regulated HHG carriers in most cases own their warehouses for customer storage.

6. Clutter Inc. seeks an exemption to UTC Tariff No. 15-C ITEM 230(2) to charge customers actual time consumed for work rather than in 15-minute increments. That's a multitude of percentages to determine cost to be charged. Could be very confusing to customers and difficult to audit by UTC staff. And what about the carriers time to return to home base?
7. Clutter Inc. requests an exemption from UTC Tariff No. 15-C ITEM 230(6) which stipulates Minimum and Maximum rates to charge below the minimum rate. The minimum rate has been determined by UTC staff as a bare minimum compensatory rate for the protection of the carrier.
8. Clutter Inc. requests an exemption from UTC Tariff No. 15-C ITEMS 230(3) and 230(7) that specify minimum times for charges during the week of 1-hour and 4-hours on weekends and holidays. The current UTC Tariff minimum time rates are compensatory rates based on the HHG carrier's operations related to employee wages and vehicle operation costs. For example on weekends there is a higher wage rate to pay.
9. Clutter Inc. requests an exemption for UTC HHG Tariff No. 15-C ITEM 102 (5)(b) and (c) to use the Commission's Bill of Lading for Small Goods Transportation and Storage. The WMC has no concern with this request.
10. Clutter Inc. wants the UTC to revise UTC HHG Tariff No. 15-C to meet their business model. The WMC non-concurs with this request. UTC HHG Tariff No. 15-C has been developed, applicable charges rated to be compensatory and in use for regulated intrastate HHG carriers.

If Clutter Inc. wants to develop an intrastate Storage Industry Tariff outside of the intrastate moving industry in consultation with the UTC, go for it. The intrastate Moving Industry prefers to remain a separate entity.

The UTC should not attempt to mix Storage industry rules, rates, and charges based on one company's business model into the UTC HHG Tariff No. 15-C. This would provide a Tariff very difficult to interpret, especially by HHG carriers with new Provisional HHG Operating Authority. They have a difficult challenge as a new carrier as is.

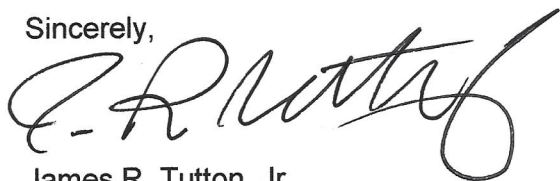
The UTC does not mix Waste Management rules, rates, and charges into the HHG Tariff No. 15-C.

Strongly request nonconcurrency with the Clutter Inc. Petition, Docket TG 210535.

And in future Intrastate HHG studies base on rules, rates, and charges the Washington Movers Conference requests they be included in the discussions. That is not an unreasonable request.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "J. R. Tutton, Jr.", written in a cursive style.

James R. Tutton, Jr.
Executive Director, WMC

cf: Ms Lisa Wise, UTC Records Center