



DATE: June 12, 2023  
FROM: Diane DeAutremont  
RE: Docket #s TV-210535 & TV-210812

Received  
Records Management  
Jun 12, 2023

I am the President of Lile International Companies, a regulated household goods moving company operating within the state of Washington under permit HG-12233, and I write today to provide comments in response to the draft HHG Tariff No. 15-C. I have briefly reviewed the draft and have the following questions or comments with respect to the document:

Item 50 – Overtime: In certain instances, it is not possible to determine the amount of overtime necessitated for a move, for example return time from a job site or in cases where overtime is required due to modifications to original scope that are made or requested by the shipper. To require a signed estimate in advance of the move may not be practicable.

Item 50 – Overtime: The draft tariff does not allow application of overtime charges for accessorial. There are many accessorial services that may be performed in conjunction with a move, e.g., packing, unpacking, appliance service, etc. that should be priced at a higher rate when service is performed on overtime at the request of the shipper.

Item 80 – Payment of Charges: If the non-binding price is limited to a maximum of 125% of the original estimate, carriers should be allowed to collect 125% of the original charges at the time of delivery. It is our experience that supplemental invoices in cases where charges are 125% but we collect only 100% at delivery, will typically not be paid.

Item 85 – Estimates: Suggest wording in paragraph 3c, referencing distribution of the moving brochure be modified to simply state that the carrier is required to maintain a record of receipt of distribution to each customer. Proposed language is confusing.

Item 90 – Carrier Liability: The addition of “depreciated” in front of the descriptions for replacement cost coverage is confusing, i.e., will the carrier be liable for the depreciated value of an item which is lost or damaged or the replacement cost value, the two of which will rarely, or possibly never be the same? Who determines depreciated value?

Item 100 – Storage: Paragraph g requires that information about a change of destination be recorded on an already too crowded bill of lading. Why not simply require that this information be recorded and retained within the customer file?

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Item 230 – Alternate Time Recording: The tariff standard increment has been 15 minutes for many years which is consistent with industry standards. To allow the change to 1 minute seems to be not only non-standard but overly burdensome from a carrier and regulator point of view. The most benefit any one consumer may realize is 14 minutes, which would not seem to be worth the collective effort required to document and monitor.

Item 230 – Minimum Charges: The allowable charge of a one-hour minimum is not compensatory. When you factor in the mandatory, non-chargeable vehicle inspection which will take 15 to 30 minutes per crew, an application of a one-hour minimum does not cover the carrier's labor expense. The minimum charge should be increased, not decreased. It should be at least 2 hours for straight time and 4 hours for overtime.

From our perspective, the most important change that should be implemented into the revised tariff is an overall increase of 25% to all rates. The pandemic, current levels of inflation, and difficulty staffing and retaining qualified drivers and helpers have dramatically increased our labor and other variable costs of operating. It is in the commission's best interest to promote a financially viable model for carriers subject to its' regulations.

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