



Washington Movers Conference

TV-210812

P.O. Box 98767
Lakewood, WA 98496
Tel: (253) 328-5641
Cell: (206) 499-9216
e-mail: jim@wmc-movers.com

James R. Tutton, Jr.
Executive Director

June 22, 2023

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

Dear Ms Maxwell,

The Washington Movers Conference (WMC) submits this Emergency Petition to the Washington Utilities and Transportation Commission (UTC) for a change to the current UTC HHG Tariff No. 15-C, ITEM 102.

The requested change applies to the description of Small Goods Transportation and Storage in the opening paragraph of ITEM 102. The description should be changed to read – *“Small Goods Transportation and Storage” is the transportation of small lots of seasonally used household goods (HHG) by a carrier from a customer’s residence to a warehouse, storage unit, or other storage facility owned or rented by the carrier with the intent to later transport the goods back to the customer’s residence.*”

Small lots of seasonally used HHGs would be Holiday Decorations or Winter activity items such as Snow Skis, Snow Boards, sleds or toboggans and/or Winter clothing. Summer activity items such as water skis, small plastic water pools, blow-up water items or water safety vests. Due to the limited size and volume of these type of household goods, the HHGs of one customer may be stored within the same warehouse, storage unit, or other storage facility as another customer’s household goods. As multiple customers’ goods may be held in the same location, no customer may have physical access to their goods while in storage without a storage facility escort.

Reasoning –

- a. It was highly obvious during the discussions at the June 20, 2023, UTC hosted Workshop reviewing proposed changes to the UTC HHG Tariff No. 15-C, the current lack of the description of small goods in the opening description of Small Goods Transportation and Storage, ITEM 102, is causing confusion between what can be considered Small Goods Transportation and Storage items versus a customer’s typical HHGs used within a residence. One participant at the Workshop wanted to use this Tariff ITEM for small shipments of regular HHGs because the rates and charges for ITEM 102 were not rate regulated.
- b. This change will eliminate any confusion between HHGs storage being handled by regulated HHG carriers through the use of HHG Tariff No. 15-C and those goods being handled by Commercial Storage Businesses.

There really needs to be one sound UTC HHG Tariff for regulated intrastate HHG carriers easily understandable by HHG carriers and their customers. Trying to merge rules applicable to two separate industries, one that is regulated and one that is not into one Tariff is not a good business practice. There are differences!

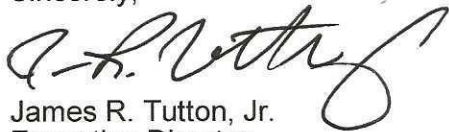
Professional Intrastate HHG carriers understand their responsibilities to their customers for the care and safe handling of the customer's goods.

The WMC does not object to any business obtaining an Intrastate HHG Operating Authority as long as the entity is capable of achieving the requirements for a Regulated HHG Operating Authority and they operate with the same HHG rules, WAC 480-15, and the Intrastate HHG Tariff No. 15-C. There must be a level playing field.

This Emergency Petition request for change to UTC HHG Tariff No. 15-C, ITEM102, is reasonable and appropriate for maintaining a level playing field within the Intrastate HHGs moving industry.

Thank you for your consideration.

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