



## Washington Movers Conference

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Executive Director

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April 29, 2020

Mr. Mark Johnson  
Executive Director/Secretary  
Utilities & Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

Dear Mr. Johnson,

In accordance with UTC Notice of Opportunity to respond to Petition for a Declaratory Order, Docket TV-200348 dated April 14, 2020, the Washington Movers Conference (WMC), on behalf of its regulated professional full-service member moving and storage companies, submits the following comments.

The WMC and its active members strongly support sound and effective regulation of Intrastate Household Goods Moving and Storage businesses along with important safety practices and solid Consumer Protection practices as found in WAC 480-15 and UTC HHG Tariff No. 15-C.

Through the past 18-24 months I have had several discussions with the UTC Consumer Protection staff dealing with Household Goods Applications for Provisional HHG Operating Authority when the Applicant clearly stated on the Application they didn't intend to obtain a Washington Workers Comp Account from the Department of Labor & Industries or open an account with Employment Securities because they didn't have employees. They intended to use Independent Contractors!

The use of Contractors/Independent Contractors within Washington requires compliance with some very stringent guidelines to make it happen correctly. HHG carriers planning to use them must meet the requirements of WAC 296-200A – Contractor Certification and Registration; and WAC 296-200-016 – Contractor Registration.

Now comes the finding of a new App Based Moving company via the internet operating without the required UTC Intrastate HHG Operating Authority plus the business's "business model" appears to use contracted labor for packing, loading, unloading, and the services of a contracted driver with truck based upon the customer's needs.

When I asked two prominent staff members responsible for Consumer Protection, I was told the company in question had a "Common Carrier Permit" (which they do) and did not need an Intrastate HHG Operating Authority! When I challenged this answer, I was told to file for a "Declaratory Order". Done.

*"Committed To Excellence"*