

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In re Application of

Permit to Operate as a Motor Carrier of
Household Goods and a Permit to Operate as a
Motor Freight Common Carrier

DOLLY, INC.

DOCKET NUMBER: TV-190594

DOLLY, INC. MOTION FOR LEAVE TO
AMEND PETITION FOR RULE
EXEMPTION

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I. INTRODUCTION

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Dolly, Inc. (“Dolly” or “the Company”) filed a Petition for Rule Exemption (“Petition”) in
3 conjunction with its application for authority to operate as a household goods carrier and seeks permission
4 to add provisions for the Washington Utilities and Transportation Commission (“WUTC” or
5 “Commission”) to consider while deciding whether to grant Dolly operating authority.

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II. APPLICABLE LAW

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WAC 480-07-395(5) states, “The commission may allow amendments to pleadings, motions, or
8 other documents on such terms as promote fair and just results.”

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III. RELIEF REQUESTED

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Dolly requests that the Commission grant it leave to amend the Petition raised by Dolly in
11 response to Staff’s motion for summary determination.

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IV. ARGUMENT

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Dolly filed a permit for authority to operate as a household goods carrier pursuant the
14 Commission’s ruling classifying Dolly as a household goods carrier subject to the Commission’s public

1 service laws.¹

2 Dolly's business model is not that of a traditional moving company because, "Dolly may not
3 employ any drivers or own any vehicles, but Dolly's Helpers do, and they are precisely the persons to
4 whom the Commission's equipment and driver safety rules are designed to apply."² However, several
5 rules are designed to apply to companies that do employ driver and own vehicles. So, Dolly applied for
6 exemptions from those rules. Dolly would now like to supplement the list of rule exemptions sought in
7 the interest of saving Commission Staff the work of having to review multiple petitions.

8 **V. CONCLUSION**

9 The Commission should grant Dolly leave to amend the Petition Dolly filed in compliance with
10 prior Commission Orders.

DATED this 13TH day of August 2019.

Respectfully Submitted,



Armikka Bryant, General Counsel
Dolly, Inc.

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¹ *In the Matter of Determining the Proper Carrier Classification of, and Complaint for Penalties Against Dolly, Inc.*, Docket TV-171212, Corrected Order 02 (April 9, 2018).

² *In the Matter of the Petition of Dolly, Inc., To Amend Motor Carrier Rules or in the Alternative to Initiate Rulemaking*, Docket TV-170999, Order 01 ¶ 11 (Oct. 31, 2017).