



ALLWEST TRANSPORTATION, INC.

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

Received
Records Management
09/27/19 16:51
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Dear Mr. Johnson,

I am the owner of Allwest Transportation in Lacey, WA. Our Operating Authority is HG- 26138

I employ nearly 30 full-time employees during the busy summer months and try to keep around 21-23 throughout the slower winter and fall.

I lease a "Brick and Mortar" business office and a 30,000 and 14,000 square foot storage warehouses.

I strongly support the Washington Movers Conference position that the time has come to change the format of UTC HHG Tariff No. 15-C by eliminating the Maximum Band of rates and raising the Minimum Band of rates by at least 25-percent. This increase to the Minimum Band will keep the one or two person moving business operating legally out of their apartment or residence with a purchased used U-Haul truck and no warehouse, thereby having very low overhead expenses, from the burden of expenses unknown to them that build up to where they can no longer pay their mandatory insurance premiums and they lose their Operating Authority or operate illegally.

The current Maximum Rate Band is not adequate/non-compensatory for my business for the following reasons –

- Washington cities implementing new, higher minimum wage requirements. Professional packing and moving is a "skilled" job and takes significant time, energy and money to properly train employees. What used to be a decent wage for an experienced, skilled mover is now equivalent to un-skilled labor positions (ie: distribution center warehouse, fast food). These businesses have been able to raise prices accordingly, however, with a max rate cap, moving companies are unable to do so. This is unsustainable and will put companies out of business or forced to consolidate.
- We are forced to consistently turn away potential work because we know the maximum rate we can charge will not cover our costs. Very recently, we had to refuse business from a repeat customer needing to move from Bellingham, WA to Snohomish, WA with a full pack. At around 65 miles this is required to be a "mileage-rated move" versus an hourly charged move. The drive (with crew on the clock!) from our facility in Lacey to Bellingham and then returning from Snohomish could not be included in the rate.
- Not all customers demand the same level of service. On one end of the spectrum, there are those that want the bare-bones, "only move the heavy items" type service. On the other side, there are customers who would like floor, wall and banister protection, bubble wrap/tissue paper rather than kraft packing paper and white-glove service. These high end moves are willing to pay a higher amount for this service.

Simply put, the Commission staff cannot keep up with constant state regulatory costs implemented, plus county and city tax and fees voted in or increased.

I presently impose a Tariff rate that is at or near the Maximum rates contained in the current Maximum Rate Band 100% of the time from the months of June through September. The remaining months vary based on scheduling.

As a professional mover, I am in the best position to know what my business costs are and what revenue is needed for my business sustainment.

When dealing with my customers, there are appropriate Consumer Protections in place for their protection as contained in WAC 480-15. An estimate agreeing to the price and service, signed by the customer, is still required!

In closing, consumers have plenty of resources to research and determine a fair rate for moving services. Internet review sites and the WUTC HHG carrier database combined with "do-it-yourself" brands such as PODS and U-haul give consumers a CHOICE.

Sincerely,

A handwritten signature in black ink, appearing to read "Charlie Naubert", written in a cursive style.

Charlie Naubert
Vice President
Allwest Transportation