

Date Received: February 20, 1998

Docket No.: TV-971477

Company: Amends WAC 480-12, Relating to Household Goods Movers

Distribution:

Chairwoman Levinson  
Commissioner Gillis  
Commissioner Hemstad  
Marjorie Schaer, ALJ  
Shirley Burrell (Rulemakings cover letters only & changes to NOH)  
Penny Hansen  
Teresa Osinski  
Dixie Linnenbrink  
Ann Rendahl, AAG  
Vicki Elliott  
Diana Otto  
Paul Curl  
Sally Turnbull  
Bonnie Allen  
Carlene Hughes  
Foster Hernandez  
Cathie Anderson  
Kim Dobyns  
Ray Gardner  
Carolyn Caruso  
Pat Dutton  
Alan Dickson (mail)  
Mary Sprouffske (No comments)

For Records Center Use Only

RMS   
FOB   
PR \_\_\_\_\_  
MSL \_\_\_\_\_  
NOH \_\_\_\_\_  
Disk   
Initial



## Pratt-Mayflower

Pratt Moving & Storage, Inc. / P.O. Box 308 / Pullman, WA 99163-0308 / (509) 332-2505

February 17, 1998

Ms. Pat Dutton, Program Development  
Transportation  
WUTC  
P.O. Box 47250  
Olympia, WA 98504-7250

Dear Ms. Dutton,

I regret not being at the Open Rule Making meeting to participate and get to meet the transportation staff.

My concerns regarding the proposed changes of entry requirements into the household goods Transportation Industry are summarized below:

The Transportation Staff of the WUTC has a knowledge of moving which is not common among most consumers. This knowledge assumes all consumers are capable of "thinking things through", "making knowledgeable choices", "understanding procedures prior to or following completion of a move." Most consumers of this industry need more knowledge than they have. Registered carriers came about in the beginning due to this need. Today, in the moving industry, the State of Washington will issue purchase orders to reputable movers who will overcharge, mandate services, and leave open-ended delivery spreads, to consumers who are unaware of their personal responsibilities regarding their moving contract. Some carriers intentionally leave the delivery dates off their Bill of Ladings so that they can cover any late delivery accusations made later. Movers also try to convince some customers that certain services must be done by the movers (complete packing for example) even though this results in chargebacks to the customer because they have exceeded their moving allowance. I am sure you can confirm these types of problems through the State Purchasing Dept./consumer complaints. These consumers assume the State or University is protecting them, and they seldom call anyone in purchasing to verify any services, prices and contract policies. They seldom call to understand their responsibilities regarding the move.

By using experienced Transportation Staff ideas, you are overlooking many problems which cause major problems of typical consumers. You have knowledge they don't have.

Safeguards need to be in place to help prevent problems, or to insure there is a responsible agent to answer and insure these problems.

RECEIVED  
RECORDS MANAGEMENT  
98 FEB 20 AM 10:41  
STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION  
RECEIVED  
FEB 20 1998  
WASH. UT. & TP. COMM.



An agent for Mayflower Transit, Inc.  
ICC No. MC-2934

000325

**PRATT MOVING & STORAGE, INC.**

Scam operations in the moving industry have packed and loaded households, then required prepayment at origin, only to be never seen again. What would it take to operate this type of scam? Letterhead sales and documents and a truck (could even be a rental truck). Movers in each market normally inform customers about regulations and consumer responsibilities. If regulations/registrations are dropped, movers have lost track of who the movers are in each market, therefore scam or overcharge operations will greatly increase.

Local moving rates are especially necessary. Without a governing body, movers would be able to change rates at will. A simple disclaimer on any contract or estimate could negate any low rate given either verbally or written. The State of New York has been dealing with these problems steadily since de-regulation. Even under the regulated conditions of today, the State is called in to protect consumers regularly. By de-regulating the industry, the problems would increase exponentially, with very little recourse or penalty.

I encourage you to approach our industry needs from the view point of our consumer. Uninformed, naive, intimidated consumers who can be easily influenced by salespeople, and who shop based on price alone generally with minimal knowledge of potential risk and contract disclaimers or protection from scams, overcharges, and service or damage claims. Thank you.

Sincerely,



Al Jones  
President

cc: Jim Tutton  
930 South 336th St.  
Federal Way, WA 98003-6384

000326