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December 16, 2008  
File No. 5113-24

**VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED**  
**TRACKING NO.: 7007 0220 0001 3201 5143; AND**  
**FAX NO.: (360) 586-1150**

David W. Danner  
Executive Director and Secretary  
Washington Utilities & Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

**RE: AMS Moving & Storage of Portland, Inc.**  
**Docket No. TV-081079**

Dear Mr. Danner:

I represent AMS Moving & Storage of Portland, Inc. and am writing in response to the Commission's Notice Intent to Cancel Temporary Authority and Reject Application for Permanent Authority; Opportunity for Hearing, which was served November 25, 2008.

AMS Moving & Storage of Portland, Inc. denies the allegations of wrongdoing by it which are set forth in the Notice of Intent and, in that respect, states as follows:

1. AMS Moving & Storage of Portland, Inc. is a separate corporation and distinct from All My Sons Moving & Storage of Seattle, Inc. AMS Moving & Storage of Portland is being improperly charged with wrongdoing based on the actions of All My Sons Moving & Storage of Seattle, a company in which it has absolutely no involvement.
2. Although there is some common ownership between AMS Moving & Storage of Portland and All My Sons Moving & Storage of Seattle, the common owners are not located in either Oregon or Washington. Indeed, Vauna Peterson resides in Texas, and Chris Bournias resides in North Carolina. Neither of them is involved in the day to day operations of AMS Moving & Storage of Portland. The operations of AMS Moving & Storage of Portland are managed by John Kourgiantakis who lives in the Portland area. It appears from the record in docket number TV-071125, and specifically the letter written by Kermit S. Escribano, President of All My Sons Moving & Storage of Seattle, Inc., that he manages the operations of All My Sons Moving & Storage of Seattle. Mr. Escribano has no

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ownership or involvement in the operations of AMS Moving & Storage of Portland.

3. The Notice of Intent recites wrongdoing by All My Sons Moving & Storage of Seattle, Inc., but ignores the fact that All My Sons Moving & Storage of Seattle voluntarily relinquished its certificate for cancellation by letter dated August 19, 2008, sent to you by Mr. Escribano prior to the hearing in that proceeding. (That letter was located on the Commission's website.)
4. AMS Moving & Storage of Portland is not responsible and should not be punished for the violations in which All My Sons of Seattle may have been involved. Paragraph 9, 11 and 12 of the Notice of Intent have nothing to do with AMS Moving & Storage of Portland, but rather have to do with All My Sons of Seattle.
5. AMS Moving & Storage of Portland has not been cited for any violation by this Commission.
6. Although some consumer complaints have been filed with the Oregon Department of Transportation in regard to AMS Moving & Storage of Portland, that is not unusual. The nature of household goods industry is that consumers frequently are disgruntled and file complaints. A review of this Commission's own records, or the records of the Oregon Department of Transportation, would reveal that virtually every authorized household goods carrier has "a documented history ... of several customer complaints ..." There is nothing whatsoever to indicate that any of the complaints against AMS Moving & Storage of Portland had merit, and this Commission's suggestion that they do this baseless. The Notice of Intent also ignores the fact that AMS Moving & Storage of Portland began operating in Oregon as a regulated household goods carrier in 1999, and between then and 2003 evidently operated with no documented customer complaints.
7. At no time did the Commission contact AMS Moving & Storage of Portland to conduct any sort of investigation of its operations or conduct any sort of audit or inquiry of its operational relationship (as compared to ownership relationship) with All My Sons Moving & Storage of Seattle. Rather, this Commission simply

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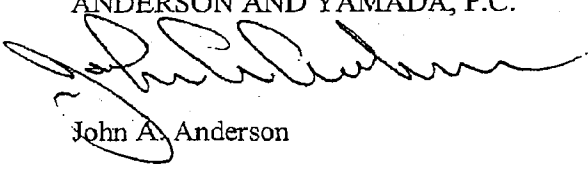
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seeks to condemn AMS Moving & Storage of Portland because there are some common owners between the two separate and distinct companies who are located thousands of miles distant from Oregon and Washington.

8. **Withdrawal of Application.** Despite vehemently denying allegations set forth in the Notice of Intent, the current economy does not warrant or allow AMS Moving & Storage of Portland, Inc. to spend its precious time and resources to battle a predisposed Commission. Furthermore, to do so would simply result in the Commission rehashing its problems and dealings with All My Sons Moving & Storage of Seattle which, as indicated, are irrelevant to the fitness, willingness and ability of AMS Moving & Storage of Portland, Inc. to provide the proposed service. AMS Moving and Storage has nothing to gain by enabling that to happen. Accordingly, AMS Moving & Storage of Portland, Inc. hereby withdraws its application and requests that the application be dismissed and that its temporary authority permit number THG-63303 be terminated.

Very truly yours,

ANDERSON AND YAMADA, P.C.

  
John A. Anderson

cc: John Kourgiantakis  
JAA:tp (F:\CLIENTS\5113\5113-24\Letters\LTR4.doc 12/16/2008)