From: Wade McLaren [mailto:wmclaren@bluebirdtransfer.com]

Sent: Wednesday, May 04, 2011 2:35 PM

To: UTC DL Records Center

Subject: WUTC Docket No. TV-110612 - Time to Take Action

Importance: High

To Whom it May Concern at WUTC -

I say NO more temporary authority approvals in Washington State!

Reference: WAC 480-15-310 = comments to actions of temporary authority.

I am recommending that you take action to deny authority, based on the following items not in compliance and being blatantly disregarded by the local mover called: Parkers Moving Services, by Jason Nelson – Docket no. TV-110612 in accordance with WAC 480-15-310.

The WAC states "Anyone wishing to comment on an action on the commission's application docket that grants or denies temporary authority may file written comments within ten days following publication. Comments must include the commenter's full name, address, telephone number, e-mail address, fax number and permit number, if applicable. Comments must indicate support for, or protest of, the temporary authority for any one or more of the following reasons:

- (a) Fitness. Most markets are already saturated with one and two truck movers that have been given temporary. They have no funds and can't stay open for long.
- (b) Public interest. There are plenty of legal operators already serving this client base. And we are not staying busy, even at the lowest legal rates, folks can't afford to spend funds like they used to.
- (c) Levels of service. They can't help a last minute client need like the larger movers already in place. A guy like this can't help two 8 hour move clients in a day. I can serve 20 of those same clients if needed. My equipment is sitting idle due to the economy.
- (d) Business practices. Obviously they are operating illegally, making false claims, and using rates out of compliance with our tariff as indicated with their ad on Craigslist.
- (e) Safety. A main concern for a one truck or two truck mover, with no money in the bank for operating or making repairs as needed.
 - (f) Operation of equipment.

The moving industry in Washington State needs a little help from your agency in these lean times when those of us who have been in business, like me since 1928, are

struggling to make ends meet. We are terribly impacted by these little guys that are being allowed to take the large berries or impact our local move revenues by being granted temporary authority and then not being able to sustain themselves with \$40,000 of moving business. They are not in compliance either, which is very frustrating for those of us that are really trying to do all we can to be a better service agent for our client base. State labor laws, safety and lacking sufficient funds to operate and make payroll for any staff are impacts that are not being considered by the UTC, in my opinion. Besides most of these people are not even able to understand the WUTC tariff 15 (it is hard enough when I have 8 people in my office that try to interpret the different sections and know what is meant by some of the language. I doubt these new guys will ever follow the guidelines.

NOTE: I also serve Oregon and have authority there. In Portland Oregon there were 13 new movers that got their temporary authority and a few that became licensed. Within 12 months 50% of them ceased operations or were asked to cease by the ODOT due to illegal activity, truck safety infractions or felons working on their crews.

I have attached a copy of the "Household Goods Moving Company Permit Application" for Parker's Moving Service downloaded from the WUTC web site. (See attachment 2.) It clearly shows this company has not opened a Workers' Comp account with the Department of Labor & Industries and has not registered with the Employment Security Department yet their Craig's List Seattle advertisement of Tuesday, May 3, 2011 (http://seattle.craigslist.org/oly/lbs/2360125341.html) states "All of our employees are background checked and drug tested to keep your mind at ease." The advertisement also shows they are advertising a \$65.00 per hour rate for two men and a truck which is below the minimum rate band for hourly rated moves contained in WUTC HHG Tariff No. 15-C.

Thanks for your consideration,

Wade McLaren President Blue Bird Transfer, Inc. 2500 East 5 Street Vancouver WA 998661

Permit holder WUTC HG #1213

360-693-4779