



September 25, 2019

Effort Enterprises of Tacoma, Inc., dba Atlantic Relocation Systems
2121 S 80th St.
Tacoma, WA 98409

State Of Washington,
Utilities and Transportation Commission
621 Woodland Square Loop S.E.
Lace, WA 98503

Received
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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Comments of Commission Published Household Goods Tariff 15-C Rate band
Docket TV-190664

To Whom It May Concern,

After careful review of Tariff 15-C the following items have been carefully reviewed and deemed in need of adjustment.

Item 90 – Carrier liability for Household Goods and Customer Valuation Options (\$5.00 times the net weight)

- The rates themselves are not a concern
- The use of \$5.00 times the net weight should rise to \$6.00 for purposes of calculating valuation, this is due to the higher cost and subsequent value of a shippers goods and to be in line with other tariffs
- It wouldn't be appropriate for this to differ by region, county or metro area; example King and Pierce County which would encompass the greater Seattle & Tacoma area.

Item 100 - Storage

Storage rate

- 100% or more are charged at max rate
- The max rate of \$2.35 is insufficient to cover the increased and still rising costs of rents, taxes, insurance and ancillary costs related to managing a facility.



ATLANTIC Relocation Systems

- It may be appropriate to have the counties of King and Pierce be at higher rates than other locals

Warehouse handling in or out

- 90% or more of moves are charged at the max rate.
- The max rate is at the low end of comparable fees today and the expectation is the rising cost of labor and limited availability to qualified labor will quickly make this rate unprofitable.
- It may be appropriate to have the greater Seattle metro at higher rates than other locals

Item 200 = Mileage Rates

- 100% of moves are performed at max rates
- Overall the rates have seen pressure from the cost of doing business, insurance, rates of pay, fuel and other factors have minimized the profitability especially when originating or destined to the King and Pierce county areas.
- The Rates are less adequate on lower mileage but do improve as mileage increases. It would be our recommendation to adjust rates in scale such as:
 - 55-150 Miles, increase by 15-20%
 - 150-300 Miles increase by 12-14%
 - Over 300 Miles increase by 10-12%

Thank you for the opportunity to submit the above written comments.

Sincerely,

David Haines

Vice President & General Manager

