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Office of State Procurement
Room 201 General Administration Building
Post Office Box 41017
Olympia Washington 98504-1017

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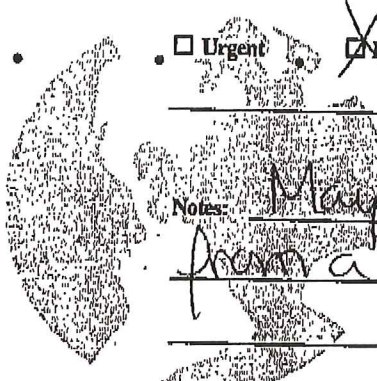
To: Kim Dobyms WUTC Fax: 586-1172

From: Deborah Chakos DSP Date: 1/14/98

Re: Rulemaking Pages: 5 (includes cover sheet)

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Notes: May be helpful - These only opinions from a state government point of view.

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RECEIVED RECORDS MANAGEMENT

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STATE OF WASHINGTON
DEPARTMENT OF GENERAL ADMINISTRATION
OFFICE OF STATE PROCUREMENT

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

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<http://www.ga.wa.gov/proc.htm>

DATE: January 14, 1998
TO: Kim Dobyms, WUTC
FROM: Deborah Chakos, Traffic Manager
SUBJECT: WUTC 15, Intent to conduct rulemaking for motor carriers with authority to transport household goods.

Thank you for meeting with me this morning to discuss the above referenced Tariff. Reviewing the Tariff, I suggest the following may be open for conversation at the stockholder meeting of January 29, 1998.

2% Fuel Surcharge: This supplemental be implemented or cancelled. Currently it is at Carriers discretion. As an option, it presents extra workload by the shipper in keeping track of which carrier will apply it separate from which carrier does not apply it. There needs to be a consistency. Also, the possible application can have an impact (relatively small) on estimates provided by the carrier during competition. I suggest that either way (apply or not) it is done consistently across the board by all carriers.

Item 8, Alternate Application of Tariffs: References tariffs 5-A, 6-A and 9. I do not have any indication that these tariffs still apply. If they are in effect 6-A that covers both Western & Eastern appear to be at first glance a duplicate of one another. Tariff 9 encompassing "Puget Sound" also is duplicated in 5-A & 6-A. Recommend that they are terminated, with utilization of General Freight guidelines of National Motor Freight Classification 100 or combined into one Intrastate Tariff with the classification being directed by NMC 100.

Item 16, Declaration of Value-Liability Limitation: Since 1977, or earlier the valuation rate of 60 cents or \$1.25 has remained unchanged. Increasing this amount could result in lower contract rates for insurance coverage for the shipper. Is there a cap on full replacement value (excess of 60 cents per LB per article)? On shipments relocating less than 35 miles (hourly without the provisions of weight scale ticket(s)) is there any minimum/maximum rates that can be applied if in excess of 60-cent valuation?

Item 18, Definition "Household Goods, (a) (2): Need revisited since the deregulation of office goods.

Item 26, Estimates: It states oral estimates are prohibited, but there is no reference to exception. Example, on an expedited service there may not be sufficient time to conduct a site visit and provide the written estimate prior to load at origin. Is it necessary to spell it out? If we do accept

Kim Dobyms
January 14, 1998
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an oral estimate under this type of situation can we clarify expedited service to include pack and load within 4 days of verbal notification to carrier.

Also, in penalizing the carrier for estimates that exceed actual does not provide benefit to shipper. Nor is it appropriate to penalize the carrier if the shipper has not been forthcoming with everything to be shipped. The unknown factors at destination can greatly impact an estimate through no fault of the shipper. The best method of "Consumer Protection" against carriers low-balling an estimate may be in payment of actual as substantiated by documentation along with providing a shipper 3 months to challenge the charges for possible refunds.

Item 28 Expedited Service: Currently set at a weight of 5,000 lb. This should be increased to 6,000 lb. Or decreased to 4,000 LB on relocations at 50 miles or more. Relocations less than 49 miles should have a minimum weight based on 4,000 lb. Listing it at 3,500 LB results in a 4,000-LB charge anyway.

Item 36. Light & Bulky Shipments: Totally confusing.

Item 65, Note 2, Flight: Could be more clearly defined for both carrier & shipper for consistency of charges by inserting the following breakdown: *Outside* 1 - 17 steps = 1 flight, 18 - 37 steps = 2 flights, 37 - 57 = 3 flights (based on interstate) *Inside on multi family dwellings* 8 steps for minimum charge with additional flights based on complete number of floors above 1st flight used in servicing goods.

Item 67, Overtime rates: The minimum hours applied to Saturdays should be regardless of origin or destination location. Eliminate the exception to Olympia + 25 mile radius and make it consistent in hours applied. However, a higher minimum hour should be applied to Holidays. Unless the Saturday selected is for carrier convenience.

Item 68, Reweigh: The excess of 100 pounds could easily account for low verses full fuel levels. Reweigh should always be required at no additional cost to the shipper on any shipments that have been placed into SIT. This protects both the carrier as well as the shipper.

Item 73, SIT: It would be most beneficial for carrier & shipper to have the rate per cwt. applied on a daily basis as opposed to a term of 30 days or fraction thereof. This may reduce confusion to shipper and make invoicing calculation easier for carrier. All parties involved can easily understand day in 1/27/98 day out 2/17/98 = 22 days SIT rate applies. (8,000 LB @ \$0.23/cwt/day verses 22 days SIT charged at 1 or 2 months fee) Warehouse handling should remain at 1 time charge of \$2.25/cwt with minimum charge increased from 500 LB to 1,000 lb.

Item 80, Mileage Rates: If maintained this table should include a weight break at 6,000 pounds. Or perhaps a table similar to Interstate (see attached copy)

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Estimate verses GPP (guaranteed price pledge or binding estimate): In my experience of monitoring state expenditures, it is my believe that estimates are more accurate than GPPs perhaps due to carrier padding or to the unforeseen circumstances being charged at full rates without discounts applied. Either should provide an opportunity to challenge the charges within a limited time (60 days) for possible re-calculations. My clients (as taxpayers) and being in a position to not pay for services/products that have not been provided, we prefer the actual charges. It is easicr for audits (federal/state/in-house) and easier for problem resolution.

Consumer Protection: Areas that could be monitored for the sake of consumer protection are minimum requirements for a carrier to obtain permits. Area for review could include safety program (hours of defensive driving, how to pack goods and lifting techniques), permanent verses temporary employees (specifically where temps are hired from), recognition of company employee by some type of consistent uniform (jeans with company logo on T-shirt) appearance is important for shippers (state & private alike). Records on fleet maintenance. Liability insurance, insurance for equipment current. Damage/claims ratios, training programs offered for drivers, packers, loaders (minimal hours of training) Expcrienced lead person on site held responsible for packing/loading crewpersons actions. Annual financial statements. References on smallest & largest job provided. Is the accounting section accurate; mistakes can be costly (monetarily as well as increase management costs involved with time for adjustments & audits)

000165

SAMPLE

PROFESSIONAL MOVERS GOVERNMENT RATE TENDER

A Section 4 - Non-GSA Transportation Charges

STB HGB 415-F

Int Revised Page 165

MILES		WEIGHT IN POUNDS											
		10000 to 10199	10200 to 10399	10400 to 10599	10800 to 10799	10800 to 10999	11000 to 11199	11200 to 11399	11400 to 11599	11600 to 11799	11800 to 11999	12000 to 12499	12500 to 12999
FROM	TO												
1	20	3,217	3,289	3,320	3,372	3,423	3,475	3,527	3,578	3,630	3,681	3,757	3,858
21	40	3,352	3,408	3,460	3,514	3,568	3,622	3,676	3,730	3,784	3,838	3,918	4,024
41	60	3,487	3,543	3,599	3,656	3,712	3,768	3,825	3,881	3,938	3,994	4,078	4,190
61	80	3,621	3,680	3,739	3,798	3,856	3,915	3,974	4,033	4,091	4,150	4,239	4,356
81	100	3,756	3,817	3,878	3,940	4,001	4,062	4,123	4,184	4,245	4,307	4,399	4,522
101	120	3,891	3,954	4,018	4,082	4,145	4,209	4,272	4,336	4,399	4,463	4,559	4,689
121	140	4,026	4,092	4,157	4,223	4,289	4,355	4,421	4,487	4,553	4,619	4,720	4,855
141	160	4,160	4,229	4,297	4,365	4,434	4,502	4,570	4,639	4,707	4,776	4,880	5,021
161	180	4,295	4,366	4,437	4,507	4,578	4,649	4,720	4,790	4,861	4,932	5,040	5,187
181	200	4,430	4,503	4,576	4,649	4,722	4,796	4,869	4,942	5,015	5,088	5,201	5,353
201	250	4,581	4,657	4,733	4,809	4,885	4,961	5,036	5,112	5,188	5,264	5,381	5,540
251	300	4,750	4,829	4,907	4,986	5,065	5,144	5,223	5,302	5,381	5,460	5,582	5,747
301	350	4,918	5,000	5,082	5,164	5,246	5,327	5,409	5,491	5,573	5,655	5,782	5,955
351	400	5,086	5,171	5,256	5,341	5,426	5,511	5,596	5,681	5,765	5,850	5,983	6,163
401	450	5,255	5,343	5,431	5,518	5,606	5,694	5,782	5,870	5,958	6,046	6,183	6,370
451	500	5,423	5,514	5,605	5,696	5,787	5,878	5,969	6,059	6,150	6,241	6,384	6,578
501	550	5,592	5,685	5,779	5,873	5,967	6,061	6,155	6,249	6,343	6,437	6,584	6,786
551	600	5,760	5,857	5,954	6,051	6,148	6,244	6,341	6,438	6,535	6,632	6,785	6,993
601	650	5,928	6,028	6,128	6,228	6,328	6,428	6,528	6,628	6,728	6,827	6,985	7,201
651	700	6,097	6,200	6,303	6,405	6,508	6,611	6,714	6,817	6,920	7,023	7,188	7,408
701	750	6,265	6,371	6,477	6,583	6,689	6,795	6,901	7,007	7,112	7,218	7,386	7,616
751	800	6,434	6,542	6,651	6,760	6,869	6,978	7,087	7,196	7,305	7,414	7,587	7,824
801	850	6,602	6,714	6,826	6,938	7,050	7,162	7,273	7,385	7,497	7,609	7,787	8,031
851	900	6,770	6,885	7,000	7,115	7,230	7,345	7,460	7,575	7,690	7,805	7,988	8,239
901	950	6,939	7,057	7,175	7,292	7,410	7,528	7,646	7,764	7,882	8,000	8,188	8,447
951	1,000	7,107	7,228	7,349	7,470	7,591	7,712	7,833	7,954	8,075	8,195	8,389	8,654
1,001	1,100	7,328	7,451	7,576	7,701	7,825	7,950	8,075	8,200	8,325	8,449	8,649	8,924
1,101	1,200	7,595	7,725	7,855	7,984	8,114	8,244	8,373	8,503	8,633	8,762	8,970	9,256
1,201	1,300	7,865	7,999	8,134	8,268	8,403	8,537	8,672	8,806	8,940	9,075	9,291	9,588
1,301	1,400	8,134	8,274	8,413	8,552	8,691	8,831	8,970	9,109	9,248	9,388	9,612	9,921
1,401	1,500	8,404	8,548	8,692	8,836	8,980	9,124	9,268	9,412	9,555	9,700	9,932	10,253
1,501	1,600	8,673	8,822	8,971	9,120	9,269	9,417	9,566	9,715	9,864	10,013	10,253	10,585
1,601	1,700	8,943	9,096	9,250	9,404	9,557	9,711	9,865	10,018	10,172	10,326	10,574	10,917
1,701	1,800	9,212	9,370	9,529	9,687	9,846	10,004	10,163	10,321	10,480	10,638	10,895	11,249
1,801	1,900	9,481	9,645	9,808	9,971	10,135	10,298	10,461	10,624	10,788	10,951	11,216	11,582
1,901	2,000	9,751	9,919	10,087	10,255	10,423	10,591	10,759	10,927	11,096	11,264	11,536	11,914
2,001	2,100	10,020	10,193	10,366	10,539	10,712	10,885	11,058	11,230	11,403	11,576	11,857	12,246
2,101	2,200	10,290	10,467	10,645	10,823	11,000	11,178	11,356	11,534	11,711	11,889	12,178	12,578
2,201	2,300	10,559	10,742	10,924	11,107	11,289	11,472	11,654	11,837	12,019	12,202	12,489	12,910
2,301	2,400	10,829	11,016	11,203	11,390	11,578	11,765	11,952	12,140	12,327	12,514	12,820	13,243
2,401	2,500	11,098	11,290	11,482	11,674	11,866	12,059	12,251	12,443	12,635	12,827	13,140	13,575
2,501	2,600	11,367	11,564	11,761	11,958	12,155	12,352	12,549	12,746	12,943	13,140	13,461	13,907
2,601	2,700	11,637	11,839	12,040	12,242	12,444	12,645	12,847	13,049	13,251	13,452	13,782	14,239
2,701	2,800	11,906	12,113	12,319	12,526	12,732	12,939	13,145	13,352	13,558	13,765	14,103	14,571
2,801	2,900	12,176	12,387	12,598	12,810	13,021	13,232	13,444	13,655	13,866	14,078	14,423	14,904
2,901	3,000	12,445	12,661	12,877	13,093	13,310	13,526	13,742	13,958	14,174	14,390	14,744	15,236
3,001	3,100	12,714	12,935	13,156	13,377	13,598	13,819	14,040	14,261	14,482	14,703	15,065	15,568
3,101	3,200	12,984	13,210	13,435	13,661	13,887	14,113	14,338	14,564	14,790	15,016	15,386	15,900
3,201	3,300	13,253	13,484	13,714	13,945	14,176	14,406	14,637	14,867	15,098	15,328	15,707	16,232
3,301	3,400	13,523	13,758	13,993	14,229	14,464	14,700	14,935	15,170	15,406	15,641	16,027	16,565
3,401	3,500	13,792	14,032	14,273	14,513	14,753	14,993	15,233	15,473	15,714	15,954	16,348	16,897
3,501	3,600	14,062	14,307	14,552	14,797	15,042	15,286	15,531	15,776	16,021	16,266	16,669	17,229
3,601	3,700	14,331	14,581	14,831	15,080	15,330	15,580	15,830	16,080	16,329	16,579	16,990	17,561
3,701	3,800	14,600	14,855	15,110	15,364	15,619	15,873	16,128	16,383	16,637	16,892	17,310	17,893
Addn'l	100 m	269	274	279	284	289	293	298	303	308	313	321	332

HOUSEHOLD GOODS CARRIERS' BUREAU COMMITTEE, AGENT
1611 DUKE STREET, ALEXANDRIA, VA 22314-3482 703-683-7410

Issued: April 01, 1997

Effective: May 01, 1997

000166

PROFESSIONAL MOVERS GOVERNMENT RATE TENDER

A Section 4 - Non-GSA Transportation Charges

STB HCB 415-F

1st Revised Page 165

MILES FROM TO		WEIGHT IN POUNDS											
		10000 to 10199	10200 to 10399	10400 to 10599	10600 to 10799	10800 to 10999	11000 to 11199	11200 to 11399	11400 to 11599	11600 to 11799	11800 to 11999	12000 to 12499	12500 to 12999
1	20	3,217	3,289	3,320	3,372	3,423	3,475	3,527	3,578	3,630	3,681	3,757	3,858
21	40	3,352	3,406	3,460	3,514	3,568	3,622	3,676	3,730	3,784	3,838	3,918	4,024
41	60	3,487	3,543	3,599	3,656	3,712	3,768	3,825	3,881	3,938	3,994	4,078	4,190
61	80	3,621	3,680	3,739	3,798	3,856	3,915	3,974	4,033	4,091	4,150	4,239	4,356
81	100	3,756	3,817	3,878	3,940	4,001	4,062	4,123	4,184	4,245	4,307	4,399	4,522
101	120	3,891	3,954	4,018	4,082	4,145	4,209	4,272	4,336	4,399	4,463	4,559	4,689
121	140	4,026	4,092	4,157	4,223	4,289	4,355	4,421	4,487	4,553	4,619	4,720	4,855
141	160	4,160	4,229	4,297	4,365	4,434	4,502	4,570	4,639	4,707	4,776	4,880	5,021
161	180	4,295	4,366	4,437	4,507	4,578	4,649	4,720	4,790	4,861	4,932	5,040	5,187
181	200	4,430	4,503	4,576	4,649	4,722	4,796	4,869	4,942	5,015	5,088	5,201	5,353
201	250	4,581	4,657	4,733	4,809	4,885	4,961	5,036	5,112	5,188	5,264	5,381	5,540
251	300	4,750	4,829	4,907	4,986	5,065	5,144	5,223	5,302	5,381	5,460	5,582	5,747
301	350	4,918	5,000	5,082	5,164	5,246	5,327	5,409	5,491	5,573	5,655	5,782	5,955
351	400	5,086	5,171	5,256	5,341	5,426	5,511	5,596	5,681	5,765	5,850	5,983	6,163
401	450	5,255	5,343	5,431	5,518	5,606	5,694	5,782	5,870	5,958	6,046	6,183	6,370
451	500	5,423	5,514	5,605	5,696	5,787	5,878	5,969	6,059	6,150	6,241	6,384	6,578
501	550	5,592	5,685	5,779	5,873	5,967	6,061	6,155	6,249	6,343	6,437	6,584	6,786
551	600	5,760	5,857	5,954	6,051	6,148	6,244	6,341	6,438	6,535	6,632	6,785	6,993
601	650	5,928	6,028	6,128	6,228	6,328	6,428	6,528	6,628	6,728	6,827	6,985	7,201
651	700	6,097	6,200	6,303	6,405	6,508	6,611	6,714	6,817	6,920	7,023	7,186	7,408
701	750	6,265	6,371	6,477	6,583	6,689	6,795	6,901	7,007	7,112	7,218	7,386	7,616
751	800	6,434	6,542	6,651	6,760	6,869	6,978	7,087	7,196	7,305	7,414	7,587	7,824
801	850	6,602	6,714	6,826	6,938	7,050	7,162	7,273	7,385	7,497	7,609	7,787	8,031
851	900	6,770	6,885	7,000	7,115	7,230	7,345	7,460	7,575	7,690	7,805	7,988	8,239
901	950	6,939	7,057	7,175	7,292	7,410	7,528	7,646	7,764	7,882	8,000	8,188	8,447
951	1,000	7,107	7,228	7,349	7,470	7,591	7,712	7,833	7,954	8,075	8,195	8,389	8,654
1,001	1,100	7,326	7,451	7,576	7,701	7,825	7,950	8,075	8,200	8,325	8,449	8,649	8,924
1,101	1,200	7,595	7,725	7,855	7,984	8,114	8,244	8,373	8,503	8,633	8,762	8,970	9,256
1,201	1,300	7,865	7,999	8,134	8,268	8,403	8,537	8,672	8,806	8,940	9,075	9,291	9,588
1,301	1,400	8,134	8,274	8,413	8,552	8,691	8,831	8,970	9,109	9,248	9,388	9,612	9,921
1,401	1,500	8,404	8,548	8,692	8,836	8,980	9,124	9,268	9,412	9,556	9,700	9,932	10,253
1,501	1,600	8,673	8,822	8,971	9,120	9,269	9,417	9,566	9,715	9,864	10,013	10,253	10,585
1,601	1,700	8,943	9,096	9,250	9,404	9,557	9,711	9,865	10,018	10,172	10,326	10,574	10,917
1,701	1,800	9,212	9,370	9,529	9,687	9,846	10,004	10,163	10,321	10,480	10,638	10,895	11,249
1,801	1,900	9,481	9,645	9,808	9,971	10,135	10,298	10,461	10,624	10,788	10,951	11,216	11,582
1,901	2,000	9,751	9,919	10,087	10,255	10,423	10,591	10,759	10,927	11,096	11,264	11,536	11,914
2,001	2,100	10,020	10,193	10,366	10,539	10,712	10,885	11,058	11,230	11,403	11,576	11,857	12,246
2,101	2,200	10,290	10,467	10,645	10,823	11,000	11,178	11,356	11,534	11,711	11,889	12,178	12,578
2,201	2,300	10,559	10,742	10,924	11,107	11,289	11,472	11,654	11,837	12,019	12,202	12,489	12,910
2,301	2,400	10,829	11,016	11,203	11,390	11,578	11,765	11,952	12,140	12,327	12,514	12,820	13,243
2,401	2,500	11,098	11,290	11,482	11,674	11,866	12,059	12,251	12,443	12,636	12,827	13,140	13,575
2,501	2,600	11,367	11,564	11,761	11,958	12,155	12,352	12,549	12,746	12,943	13,140	13,461	13,907
2,601	2,700	11,637	11,839	12,040	12,242	12,444	12,645	12,847	13,049	13,251	13,452	13,782	14,239
2,701	2,800	11,906	12,113	12,319	12,526	12,732	12,939	13,145	13,352	13,558	13,765	14,103	14,571
2,801	2,900	12,176	12,387	12,598	12,810	13,021	13,232	13,444	13,655	13,866	14,078	14,423	14,904
2,901	3,000	12,445	12,661	12,877	13,093	13,310	13,526	13,742	13,958	14,174	14,390	14,744	15,236
3,001	3,100	12,714	12,935	13,156	13,377	13,598	13,819	14,040	14,261	14,482	14,703	15,065	15,568
3,101	3,200	12,984	13,210	13,435	13,661	13,887	14,113	14,338	14,564	14,790	15,016	15,386	15,900
3,201	3,300	13,253	13,484	13,714	13,945	14,176	14,406	14,637	14,867	15,098	15,328	15,707	16,232
3,301	3,400	13,523	13,758	13,993	14,229	14,464	14,700	14,935	15,170	15,406	15,641	16,027	16,565
3,401	3,500	13,792	14,032	14,273	14,513	14,753	14,993	15,233	15,473	15,714	15,954	16,348	16,897
3,501	3,600	14,062	14,307	14,552	14,797	15,042	15,286	15,531	15,776	16,021	16,266	16,669	17,229
3,601	3,700	14,331	14,581	14,831	15,080	15,330	15,580	15,830	16,080	16,329	16,579	16,990	17,561
3,701	3,800	14,600	14,855	15,110	15,364	15,619	15,873	16,128	16,383	16,637	16,892	17,310	17,893
Addn'	100 m	269	274	279	284	289	293	298	303	308	313	321	332

HOUSEHOLD GOODS CARRIERS' BUREAU COMMITTEE, AGENT
1611 DUKE STREET, ALEXANDRIA, VA 22314-3482 703-683-7410

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