



Washington Movers Conference

of the Washington Trucking Associations

930 South 356th Street, Suite B
Federal Way, WA 98003-6384
(253) 838-1650
1-800-732-9019
Fax (253) 838-1715
www.wmcmovers.com

James R. Tutton, Jr.
Executive Director

December 8, 2011

Mr. Dave Danner
Executive Director/Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Dear Mr. Danner:

Good work thus far by the WUTC staff in the revisions drafted regarding the "Rulemaking to Consider Revising Household Goods Carrier Entry and Fitness Standard Rules in WAC 480-15", Docket TV-111493.

The Washington Movers Conference would like to provide the following comments to the Washington Utilities and Transportation Commission. Comments are as follows:

In New Section – **WAC 480-15-302, Provisional authority:**

Recommend Adding new paragraph (4) – The applicant has provided evidence of financial fitness to operate a moving company. The commission will accept as evidence a current company Balance Sheet or a current company bank statement.

Change - Old paragraph (4) to paragraph (5).

Change - Old paragraph (5) to paragraph (6).

Change - Old paragraph (6) to paragraph (7).

Change - Old paragraph (7) to paragraph (8).

Change - Old paragraph (8) to paragraph (9).

Recommend Adding new paragraph (10) - If the applicant intends to use temporary workers, the applicant certifies that it will maintain records for three years that describe the date(s) worked, names of temporary workers and the source from where the temporary workers were obtained.

Change - Old paragraph (9) to paragraph (11).

Change - Old paragraph (10) to paragraph (12).

Change - Old paragraph (11) to paragraph (13).

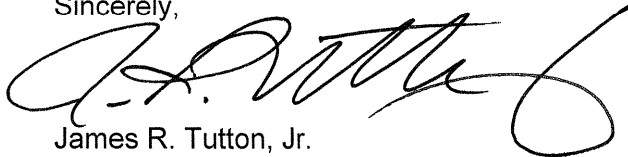
Recommend Adding new paragraph (14) – The provisional application review period is not less than six months. One extension may be granted for a period of not more than six additional months when additional staff time is needed to evaluate the applicant, complete applicable required audits, or complete any needed applicant training. If, following the second six-month evaluation period, the application process is still incomplete; the application will be voided and returned to the applicant with comment.

Change - Old paragraph (12) to paragraph (15).

No other changes suggested.

Should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. R. Tutton, Jr.', written in a cursive style.

James R. Tutton, Jr.
Executive Director

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