

**From:** Jim Tutton [mailto:jim@wtassns.com]

**Sent:** Monday, September 23, 2013 4:41 PM

**To:** UTC DL Records Center

**Subject:** Rulemaking to Revise Household Goods Rules, WAC 480-15, Docket No. TV 130079

Dear Sir:

Thank you for the opportunity to provide comments on behalf of the Washington Movers Conference regarding the Rulemaking to Revise Household Goods Rules, WAC 480-15, Docket No. TV- 130079.

The WMC concurs with the drafted changes with the exception of paragraphs WAC 480-15-305 and 480-15-555 as they relate to criminal background checks.

The time period of "within the past five years" exceeds the three year requirement now performed by the major van lines for their local agent's employees operating in Washington State. To complete a five year search of records would require a second criminal background check to meet the five year requirement with additional cost.

James R. Tutton, Jr.

Executive Director

Washington Movers Conference

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Sent from my BlackBerry Wireless Handheld