



Washington Movers Conference

A-230217

James R. Tutton, Jr.
Executive Director

November 28, 2023

Ms Kathy Hunter
Acting Executive Director/Secretary
Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Dear Ms Hunter,

The Washington Movers Conference (WMC), a trade group representing the concerns, needs, and regulated issues of legally regulated Intrastate Household Carriers operating within Washington State, submits the following comments in accordance with the Washington Utilities and Transportation Commission's (WAUTC) Notice of Opportunity to File Written Comments (Notice) issued in Docket TV-230217 on September 29, 2023, regarding a Commission proceeding to develop a policy statement to address the application of equity and justice in Commission and regulated company processes and decisions.

The WMC appreciates the Commission's initiation of this proceeding and welcomes guidance from the Commission on how to further incorporate equity into its business practices.

The Washington Movers Conference (WMC) submits the following comments in response to the UTC's request for input regarding the Commission's policy statement to address the application of equity and justice in commission and regulated companies' processes and decisions as best we understand the UTC request:

- a. All regulated Intrastate Household Carriers wanting to become members of the WMC must adhere to the following WMC Code of Conduct -

"WE, the members of the Washington Movers Conference, stand united in our sincere beliefs that honest, ethical, efficient and quality services to the public are the ultimate goals of this organization. Whereupon we, engaged in the transporting and storage of household goods, pledge ourselves to uphold and advance the following ideals and principles:

TO consistently offer and provide the most efficient and reliable moving and storage services available, while adhering strictly to a policy of truth, honesty, integrity and fairness in all business transactions.

P.O. Box 98767
Lakewood, WA 98496
Tel: (253) 328-5641
Cell: (206) 499-9216
e-mail: jim@wmc-movers.com

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TO strictly adhere to all State laws, rules, regulations and applicable tariffs governing moving and storage operations within Washington State.

TO be conscious and considerate of consumer needs and to continually promote the progress, fraternity, education and dignity of our industry so that the public will be better served.

TO promote the elimination of fraud, deceit, misrepresentation and unethical practices within the industry and to engage in formal disciplinary review of any and all members involved in such practices.

TO afford all members and applicants maximum due process in the administration of Conference affairs, to promote competitive practices and to eliminate unlawful restraint of trade within the industry.

TO maintain the highest concern for the health, welfare and safety of our employees, while recognizing their needs as both human beings and individuals.

TO faithfully fulfill all obligations of membership, including the timely payment of all charges for membership affiliation and services.

TO protect free enterprise in a democratic society and to foster the commercial viability of the small business component of our industry.

AND to adhere to the Conference Bylaws and these Code of Conducts as adopted by the governing Board of the Washington Movers Conference.”

b. All regulated Intrastate Household Carriers are equal opportunity employers. All employment announcements and applicable job descriptions are clear in what is expected of the applicant. For example, some positions are designated “sensitive work positions” that require passing an appropriate drug and alcohol test and/or screening; and all employees must pass a national Background Screening.

c. All regulated Intrastate Household Carriers, based on their application and receipt of an Intrastate Household Goods Operating Authority, may service customers in any town, city, or county within Washington State based on WAC 480-15 rules and the UTC Intrastate HHG Tariff. Thus, competition prevails.

With regard to “What element(s) of Procedural Justice is most important to you?” This one is easy to answer –

1. Equal treatment of all parties subject to WAC 480-15 rules and the UTC HHG Tariff No. 15-C.

a. There have been instances in the past where one or more regulated Intrastate Household Carriers were allowed to operate outside of the rules of WAC 480-15 and the UTC Intrastate HHG Tariff.

b. Focusing on UTC TV-230724, a filed rulemaking to determine whether the Household Goods Moving industry is competitive and may benefit from some

alternative form of economic regulation, including but not limited to removing the maximum rate band in UTC HHG Tariff 15-C.

- c. Allowing regulated Intrastate Household Carriers to assess credit card processing fees, UTC TV-230026, when the customer requests to use an appropriate credit card for payment of the charges presented by the regulated Intrastate Household Carrier for their HHGs relocation in line with other regulated industries and most if not all Washington State Agencies.
2. Improving upon the timeline for UTC approvals/disapprovals of requested regulatory actions submitted by the regulated industry.
 3. Improving upon the current procedures for submitting requested comments to the UTC Records Center for inclusion in a UTC Docket.

Should you have any questions regarding these comments, feel free to contact me at (206) 499-9216 or

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