

Date Received: November 17, 1997

Docket No.: TV-971477

Company: Amends WAC 480-12, Relating to Household Goods Movers

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November 11, 1997

To: The Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive, SW
Olympia, WA 98504-8002

From: Harry W. Naubert, Jr., President
Allwest Transportation, Inc. CC-026138
2950 26th Ave. SW
Tumwater, WA 98512

We are an intrastate, irregular route, non-radial service as a carrier of household goods in the state of Washington.

Re: Household Goods Rule Making
Docket No. TV-971477

A. First consideration to today's regulation of household goods moving, should be to determine if this is still possible. We find many "movers" who disregard the existing tariff rules, rates and regulations. Some flaunt their activity, while others quietly ignore the tariff.

Apparently, the Utilities and Transportation Commission has been unable to deter or eliminate these operators- probably because it is understaffed and not adequately funded.

Unless corrective steps are taken, it would seem useless to continue regulation- and deregulate household goods, as has been done with other commodities.

B. If deregulation is not forthcoming- my comments on issues mentioned concerning rule making.

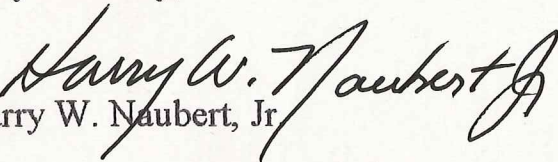
1. "Household Goods" definition needs modification update.

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2. (a). Tariff Publication. If WUTC cannot continue- carriers should be allowed to publish their own tariff.
(b). Application process is no longer workable. Public convenience and necessity cannot be proven. We all bought our permits- for many dollars.
(c). Operating authorities are not able to keep up with population expansions and with the vast number of new municipalities formed. Probably this area limitation needs to be modified or eliminated.
3. Consumer protection rules may well be minimal- but without UTC enforcement- are of no value. The eight areas under consideration all need review and updating.
4. Covered under 2(b) above.
5. Other issues. Please keep me on your mailing list regarding this matter.

Very sincerely,


Harry W. Naubert, Jr

cc: 10
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