

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In re Application of

Dolly, Inc.

for a permit to operate as a motor carrier
of household goods and a permit to operate
as a motor freight common carrier

DOCKET TV-180605

COMMISSION STAFF'S
MOTION FOR SUMMARY
DETERMINATION

I. INTRODUCTION

1 Dolly, Inc. (Dolly) has amassed a lengthy history of noncompliance with the Commission's orders in Docket TV-171212. That history leaves no remaining material issue of fact as to whether the company is fit to hold operating authority—it is not. The Commission should summarily determine that Dolly's application for operating authority should be denied due to that lack of fitness.

II. RELIEF REQUESTED

2 Commission Staff (Staff) respectfully requests that the Commission conclude that no material issue of fact exists as to Dolly's lack of regulatory fitness and, accordingly, that it grant Staff summary determination and deny Dolly's application for household goods carrier and motor freight common carrier permits.

III. STATEMENT OF FACTS

3 This docket, which concerns Dolly's application for household goods carrier and motor freight common carrier permits, has its roots in Commission Docket TV-171212. There, the Commission initiated a classification proceeding¹ against Dolly to determine whether the company was engaging in business as a household goods carrier or operating as

¹ See RCW 81.04.510.

a motor freight common carrier or for the hauling of solid waste.² A Commission ALJ determined that Dolly was and ordered the company classified as a household goods carrier, a motor freight common carrier, and a solid waste collection company; imposed a penalty on Dolly for violations of the public service laws; partially suspended that penalty subject to Dolly's compliance with the ALJ's order; and ordered Dolly to cease and desist from jurisdictional operations unless and until it obtained operating authority.³

4 The Commission affirmed the ALJ's order on review.⁴ Accordingly, Dolly was required to "immediately cease and desist operating as a household goods carrier, common carrier, and solid waste collection company unless it obtains authority from the Commission."⁵ Dolly was also required to make certain changes to its advertising to indicate that "it does not offer or perform services in the state of Washington as a household goods carrier, as a common carrier transporting property other than household goods, or as a solid waste hauler" until it obtained authority from the Commission.⁶ The Commission, although affirming the amount of the ALJ's penalty assessment, suspended the entirety of the penalty conditioned on Dolly's compliance with the terms of the Commission's final order.⁷

5 Dolly moved the Commission to stay the effectiveness of its final order, arguing that the order would "require[] Dolly to permanently refrain from making its services known to consumers and refrain from providing those services."⁸ The Commission denied that request,⁹ noting that the legislature requires the Commission to order entities providing

² Decl. of Susie Paul at 1 ¶ 2, Attachment A (Order 01 in Docket TV-171212)

³ *Id.* at 1 ¶¶ 3-4, Attachment B at 8-9 ¶ 28, 15-17 ¶¶ 48-56 (Corrected Order 02 in Docket TV-171212).

⁴ *Id.* at 2 ¶¶ 5, 6, Attachment C (Order 04 in Docket TV-171212).

⁵ *Id.* at Attachment C at 19 ¶ 75.

⁶ *Id.* at Attachment C at 19 ¶ 76.

⁷ *Id.* at Attachment C at 19 ¶¶ 77-78.

⁸ *Id.* at Attachment E at 3 ¶ 5 (Dolly's motion for administrative stay); *see id.* at 2 ¶ 8.

⁹ *Id.* at 2 ¶ 8, Attachment D (Order 05 in Docket TV-171212).

jurisdictional services without authority to do so to cease and desist.¹⁰ The Commission did, however, clarify for the company that it “must simply comply with the” cease and desist provisions of its final order “while engaging in the permit application process,” meaning that Dolly would not necessarily need to permanently refrain from providing service.¹¹

6 Dolly then petitioned the Thurston County Superior Court for review of the Commission’s final order.¹² It also moved that court to stay the order’s effectiveness during review.¹³ In its motion, Dolly informed the superior court that the order required it to “effectively shut down all operations in its home state.”¹⁴ The superior court denied Dolly’s motion for a stay without prejudice, and Dolly never renewed it.¹⁵

7 Staff reviewed Dolly’s operations to determine whether it had complied with the Commission’s final order both in the days after the Commission issued the order and also after the superior court denied Dolly’s motion for stay.¹⁶ Staff’s review disclosed that Dolly had not ceased and desisted from its unlawful operations.¹⁷

8 Given Dolly’s failure to comply, Staff moved the Commission to impose the penalty assessed but suspended in its final order.¹⁸ When Dolly did not deny that it had continued operating in violation of the cease and desist order,¹⁹ the Commission determined that Dolly had engaged in business or operated without the requisite authority and imposed the suspended penalty.²⁰ In doing so, the Commission again made clear that Dolly needed to

¹⁰ *Id.* at ¶ 5, Attachment D at 2 ¶ 2.

¹¹ *Id.* at Attachment D at 3 ¶ 8.

¹² *Id.* at 2 ¶ 9.

¹³ *Id.* at 2 ¶ 9.

¹⁴ *Id.* at Exhibit F at 9:9-10.

¹⁵ *Id.* at 2 ¶ 10.

¹⁶ *Id.* at Attachment G; *see id.* at 2 ¶ 11.

¹⁷ *Id.* at 2 ¶ 11, Attachment G.

¹⁸ *Id.* at 2 ¶ 11, Attachment G.

¹⁹ *Id.* at Attachment H at 5 ¶ 11 (Order 06 in Docket TV-171212).

²⁰ *Id.* at Attachment H at 6 ¶¶ 12-14.

cease and desist from its unlawful operations until it obtained authority to provide regulated services.²¹

9 Dolly did not petition for review of the imposition of the suspended penalty, move to stay the imposition of the suspended penalty, or pay the penalty.²² Instead, Dolly applied for mitigation of the penalty.²³ A Commission ALJ denied that motion based on both its procedural impropriety and Dolly’s failure to cease and desist from its unlawful operations.²⁴ When doing so, the ALJ noted that “Dolly fails to accept responsibility for its decision to continue operating in violation of the Commission’s cease and desist order, which required the Company to shut down its operations until such time its application is approved.”²⁵

10 The Commission denied Dolly’s petition for review of the ALJ’s order denying its application for mitigation.²⁶ The Commission, in its order, adopted the ALJ’s order and reasoning and specifically rejected Dolly’s arguments that it had complied with the Commission’s final order.²⁷ The Commission ordered that the penalty it had imposed after Dolly’s noncompliance with its final order became due and payable on October 10, 2018.²⁸ Despite that, Dolly has not paid the penalty.²⁹

11 Staff performed another review of Dolly’s operations to see if the imposition of suspended penalty caused Dolly to cure its noncompliance with the Commission’s orders.³⁰

²¹ See *id.* at Attachment H at 5-6 ¶ 11.

²² See *id.* at 3 ¶ 13.

²³ See *id.* at 3 ¶ 13.

²⁴ *Id.* at 3 ¶ 13, Attachment I at 2-3 ¶¶ 8-10 (Order 07 in Docket TV-171212).

²⁵ *Id.* at Attachment I at 3 ¶ 10.

²⁶ *Id.* at 3 ¶ 13, Attachment J (Order 08 in Docket TV-171212).

²⁷ *Id.* at Attachment J at 3 ¶¶ 12-13, 4 ¶ 16.

²⁸ *Id.* at Attachment J at 5 ¶ 18.

²⁹ *Id.* at 3 ¶ 13.

³⁰ *Id.* at 3-6 ¶¶ 14-31.

Alas, it did not. Staff found numerous advertisements for the provision of regulated services in Dolly’s digital presence.³¹ None of these advertisements indicate that Dolly does not provide such services in Washington; worse, many of them either directly state that Dolly does provide services in this state or link to pages containing those statements.³² Dolly also continues to offer to transport household goods or other property for compensation over the public highways between points in Washington. Staff received offers from Dolly to do just that in both September and October 2018.³³

12 Given that history, Staff recommended that the Commission deny the application for operating authority that Dolly filed in this docket. The Commission agreed and notified Dolly of its intent to deny its application for operating authority.³⁴ Dolly requested a hearing. As discussed below, the Commission should determine that none is necessary.

IV. STATEMENT OF ISSUES

13 Does Dolly’s history of non-compliance with the Commission’s orders demonstrate the company’s lack of regulatory fitness as a matter of law, requiring the Commission to grant Staff summary determination and deny Dolly’s application for household goods and motor freight common carrier permits?

V. EVIDENCE RELIED UPON

14 Staff relies on the Declaration of Susie Paul and the attachments thereto, which Staff submitted contemporaneously with this motion.

VI. STANDARD FOR SUMMARY DETERMINATION

³¹ *Id.* at 3-6 ¶¶ 14-31.

³² *E.g., Id.* at 3-4 ¶¶ 14-16, 4 ¶¶ 20-21, 5 ¶ 26, 6 ¶ 28.

³³ *Id.* at 4 ¶¶ 17-18, 5 ¶ 22, 5-6 ¶¶ 27.

³⁴ *See generally In re Application of Dolly, Inc.*, Docket No. TV-180605, Notice of Intent to Deny Application for Permanent Authority; Notice of Opportunity for Hearing (Sept. 21, 2018).

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The Commission authorizes motions for summary determination where “the pleadings filed in the proceeding, together with any properly admissible evidentiary support show that there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law.”³⁵ The Commission authorizes those motions to avoid a needless expenditure of resources where a hearing is unnecessary because no material factual issues exist.³⁶ The Commission considers all evidence, and any reasonable inferences arising therefrom, in the light most favorable to the non-moving party when considering whether a material issue of fact exists.³⁷ However, where reasonable minds can reach only one conclusion, issues of fact become immaterial because the Commission may resolve them as questions of law.³⁸

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The party moving for summary determination bears the burden of showing the absence of a material issue of fact.³⁹ If the moving party satisfies its burden, then the non-moving party must present evidence demonstrating material facts are in dispute.⁴⁰ The non-moving party must do so by “set[ting] forth specific facts showing that there is a genuine issue for trial” and may not rest on mere allegations in its pleadings.⁴¹ If the non-moving party fails to make a sufficient showing to establish a material issue of fact as to an element for which it bears the burden of proof, the tribunal should grant the motion for summary determination.⁴²

³⁵ WAC 480-07-380(2)(a); *see also id.* (noting that the Commission considers the standards applicable to a motion for summary judgment made under Washington Civil Rule 56 when adjudicating a motion for summary determination).

³⁶ *LaPlante v. State*, 85 Wn.2d 154, 158, 531 P.2d 299 (1975).

³⁷ *Atherton Condo Ass’n v. Blume Dev. Co.*, 115 Wn.2d 506, 516, 799 P.2d 250 (1990).

³⁸ *Hartley v. State*, 103 Wn.2d 768, 775, 698 P.2d 77 (1985).

³⁹ *Young v. Key Pharm., Inc.*, 112 Wn.2d 216, 225, 770 P.2d 182 (1989).

⁴⁰ *Atherton Condo Ass’n*, 115 Wn.2d at 516.

⁴¹ *LaPlante v. State*, 85 Wn.2d at 158.

⁴² *Atherton Condo Ass’n*, 115 Wn.2d at 517.

VII. ARGUMENT

17 Dolly’s history at the Commission is one of contumacious refusal to comply with the public service laws and the Commission’s orders. That history leaves no material issue of fact for the Commission to resolve at hearing and demonstrates, indisputably, conclusively, and in and of itself, that Dolly lacks regulatory fitness. The Commission should grant summary determination and deny Dolly’s application for operating authority on that basis.

18 An applicant seeking a household goods carrier permit must demonstrate, among other things, that it is “fit, willing, and able to perform the services proposed and conform to this chapter and the requirements, rules, and regulations of the commission.”⁴³ An applicant for a motor freight common carrier permit must make a similar demonstration.⁴⁴ The applicant bears the burden of establishing fitness.⁴⁵

19 The Commission generally considers fitness to have two aspects: regulatory and financial fitness.⁴⁶ Regulatory fitness concerns the applicant’s willingness and ability to, as the public service laws put it, “conform to [chapter 81.80 RCW] and the requirements, rules, and regulations of the Commission.”⁴⁷

20 The Commission considers an applicant’s compliance history “one of the best predictors of willingness and ability to comply with regulatory requirements.”⁴⁸ A history of

⁴³ RCW 81.80.075(3); *In re Application of Rainier Moving Co., LLC for a permit to operate as a motor carrier of household goods*, Docket TV-160323, Order 01, at 3-4 ¶ 14 (July 12, 2016) (ALJ Order, which became final by operation of law).

⁴⁴ RCW 81.80.070(2).

⁴⁵ *Rainier Moving Co.*, Docket TV-160323, Order 01, at 3-4 ¶ 14.

⁴⁶ See *In re Application GA-75154 of Ryder Distrib. Res., Inc.*, Order M.V.G. No. 1761, Hearing GA-75154 & Hearing GA-77539, 1995 Wash. UTC Lexis 35, at *11-22 (Aug. 9, 1995).

⁴⁷ RCW 81.80.075(3); *In re Application GA-75154 of Ryder Distrib. Res., Inc.*, Order M.V.G. No. 1761, 1995 Wash. UTC Lexis 35, at *11.

⁴⁸ *In re Application of Redline Courier, Inc.*, Order M. V. No. 148367, Hearing No. P-77664, 1994 Wash. UTC Lexis 86, Commission Decision and Order Denying Review; Affirming Initial Order Granting Application in Part, at ¶ 14 (Dec. 13, 1994).

violations, however, is not a per se bar to a finding that the applicant is fit.⁴⁹ When looking at whether an applicant can overcome a history of noncompliance for purposes of establishing fitness, the Commission considers whether the violations were “repeated and flagrant” as well as “whether corrective action was promptly taken . . . and whether the applicant can now provide credible assurances of future compliance.”⁵⁰

21 Initially, there is no material issue of fact as to whether Dolly complied with regulatory requirements—it did not. Dolly engaged in business or operated as a jurisdictional carrier without authority to do so before the Commission initiated a classification proceeding against it, a fact established by the Commission after a fully litigated proceeding in Docket TV-171212.⁵¹ Dolly cannot now contest that it did so at hearing in this matter.⁵² Dolly continued to violate both the public service laws⁵³ and the Commission’s cease and desist order by engaging in business or operating after the Commission entered its final order, another fact established by concession in Docket TV-171212,⁵⁴ and one that Dolly also cannot now contest in this matter.⁵⁵ And, as of the date of this motion, Dolly continues to operate in spite of the Commission’s cease and desist order by advertising to provide jurisdictional services on a number of websites and offering to

⁴⁹ *Redline Courier*, 1994 Wash. UTC Lexis at *7.

⁵⁰ *In re Application GA-75154 of Ryder Distrib. Res., Inc.*, Order M.V.G. No. 1761, 1995 Wash. UTC Lexis 35, at *11.

⁵¹ Decl. of Susie Paul at Attachment B at 8-9 ¶¶ 18, 11 ¶¶ 26-27, 15-16 ¶¶ 48-54 (Corrected Order 02 in Docket TV-171212), Attachment C at 4 ¶ 11, 4-9 ¶¶ 14-27, 17-18 ¶¶ 55-61 (Order 04 in Docket TV-171212).

⁵² *Hanson Processing, LLC v. Cascade Nat. Gas Corp.*, Docket No. UG-980860, 1999 Wash. UTC Lexis 123, Commission Decision and Order Dismissing Complaint, at *22-28 (Feb. 10, 1999) (collateral estoppel); *Christensen v. Grant County Hosp. Dist. No. 1*, 152 Wn.2d 299, 306-07, 96 P.3d 957 (2004) (same).

⁵³ E.g., RCW 81.80.070(1), .075(1), .355.

⁵⁴ Decl. of Susie Paul at Attachment H at 5-6 ¶¶ 11-13.

⁵⁵ *Hanson Processing, LLC v. Cascade Nat. Gas Corp.*, 1999 Wash. UTC Lexis 123, at *22-28; *Christensen*, 152 Wn.2d at 306-07.

transport household goods and other property within points of Washington for compensation.⁵⁶

22 Further, there is no material issue of fact as to whether Dolly’s violations were
flagrant and repeated—they were. Dolly carried on operations despite a cease and desist
order from the Commission.⁵⁷ The Commission considers continued operations in violation
of a cease and desist order the type of flagrant and repeated conduct that justifies a finding
of unfitness.⁵⁸ That is because the violation of a cease and desist order evidences “blatant
disregard for the Commission’s rules.”⁵⁹

23 Dolly’s violations are, in fact, especially flagrant and repeated, for two reasons.

24 First, Dolly knowingly violated the cease and desist order, making its violations
flagrant. Dolly carried on operations despite the Commission reiterating Dolly’s need to
cease and desist through no less than four orders subsequent to its final order.⁶⁰ These
admonitions went unheeded by Dolly. And, regardless, Dolly clearly understood what the
cease and desist order meant; it said as much in pleadings when it twice sought to stay the
order.⁶¹

⁵⁶ Decl. of Susie Paul at 3-6 ¶¶ 14-31.

⁵⁷ *E.g., id.* at 3-6 ¶¶ 14-31, Attachment J at 4 ¶ 16 (Order 08 in Docket TV-171212).

⁵⁸ *See In re Application of Sani Mahama Maurou d/b/a Seatac Airport 24, In re Investigation of Sani Mahama Maurou d/b/a Seatac Airport 24, In re Penalty Assessment Against Sani Mahama Maurou d/b/a Seatac Airport 24*, Docket Nos. TC-152296 & TC-160187 & TC-160324 (consolidated), Order 02 & Order 04, at 2 ¶ 6 (Aug. 16, 2016) (final order affirming the order of the ALJ); *In re Application of Sani Mahama Maurou d/b/a Seatac Airport 24, In re Investigation of Sani Mahama Maurou d/b/a Seatac Airport 24; In re Penalty Assessment Against Sani Mahama Maurou d/b/a Seatac Airport 24*, Docket Nos. TC-152296 & TC-160187 & TC-160324 (consolidated), Order 01 & Order 03, at 5 ¶¶ 20-22 (July 14, 2016) (initial order by ALJ).

⁵⁹ *In re Application of Sani Mahama Maurou d/b/a Seatac Airport 24, In re Investigation of Sani Mahama Maurou d/b/a Seatac Airport 24; In re Penalty Assessment Against Sani Mahama Maurou d/b/a Seatac Airport 24*, Docket Nos. TC-152296 & TC-160187 & TC-160324 (consolidated), Order 01 & Order 03, at 5 ¶ 21.

⁶⁰ Decl. of Susie Paul at Attachment D at 3 ¶ 8 (Order 05 in Docket TV-171212), Attachment H at 5-6 ¶¶ 11 (Order 06 in Docket TV-171212), Attachment I at 3 ¶ 10 (Order 07 in Docket TV-171212), Attachment J at 4 ¶ 16 (Order 08 in Docket TV-171212).

⁶¹ Decl. of Susie Paul at Attachment E at 3 ¶ 5 (Dolly’s motion for administrative stay which noted that the cease and desist order required it to “refrain” from providing services), Attachment F at 9:9-10 (Dolly’s motion for a judicial stay which noted that the Commission’s order required it to “shut down” in Washington).

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Second, Dolly’s violations were, and continue to be, extensive and repeated. Dolly has not changed its advertising in any meaningful way since the Commission entered its final order.⁶² This means that Dolly violates the public service laws and the Commission’s final order daily through advertisements on its website and Facebook, Twitter, and Instagram pages.⁶³ Further, Dolly continues to offer to transport property or household goods between points in Washington for compensation. Staff, in fact, obtained quotes from Dolly for such service in both September and October.⁶⁴ Staff obtained those quotes: (1) well after the entry of the Commission’s final order, (2) well after the denial of Dolly’s motion to stay that order, (3) well after the superior court’s denial of a separate motion to stay the Commission’s final order, (4) after the Commission imposed the suspended penalty due to Dolly’s noncompliance with the cease and desist order, and, in part, (5) after the Commission denied Dolly’s application for mitigation.⁶⁵ Staff, in fact, obtained one of the quotes from Dolly after the Commission notified the company that it intended to deny its application for operating authority based on its lack of fitness⁶⁶ and after Dolly notified the Commission that it wanted a hearing on the issue.⁶⁷

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Nor is there any material issue of fact as to whether Dolly promptly took corrective action to remedy its noncompliance—it did not. Dolly did not quickly cease and desist from

⁶² Decl. of Susie Paul at 2-6 ¶¶ 11-31.

⁶³ RCW 81.77.040, RCW 81.80.075, .355; *In re Determining the Proper Carrier Classification of, and Complaint for Penalties Against Dolly, Inc.*, Docket TV -171212, Order 04, at 19 ¶¶ 75-76 (May 18, 2018) (cease and desist order).

⁶⁴ Decl. of Susie Paul at 4 ¶¶ 17-18, 5 ¶ 22, 5-6 ¶ 27.

⁶⁵ *See generally id.*

⁶⁶ *See id.* at 5-6 ¶ 27

⁶⁷ *See generally In re Application of Dolly, Inc.*, Docket TV-180605, Dolly, Inc. Request for Adjudicative Proceeding, at 1 ¶¶ 1-3 (October 5, 2018).

its unlawful operations when ordered to; in fact, Dolly never did.⁶⁸ Its violations continue as of the date Staff filed this motion.⁶⁹

27 There is no material issue of fact as to whether Dolly can meaningfully assure the Commission of its future compliance—it cannot. Even assuming that the company would or could offer assurances of future compliance, a somewhat dubious prospect given the company’s history, the Commission requires an applicant to combine such assurances with objective manifestations of its intent to comply to overcome a poor compliance history.⁷⁰ Put otherwise, mere words alone do not suffice. And Dolly cannot offer any evidence of objective manifestations of its intent to comply for the simple reason that it has never objectively manifested any such intent. Again, although Staff does not mean to sound like a broken record, Dolly has never complied with the Commission’s order to cease and desist; it continues to violate the public service laws and that order even as Staff submits this motion.⁷¹

28 Finally, there is no material issue of fact as to whether Dolly has complied with the Commission’s order to pay a penalty for violations of the public service laws—it has not. It did not do so after the Commission imposed the suspended penalty, making that penalty due and payable.⁷² And it has not done so since the Commission denied review of the order denying Dolly’s application for mitigation, which established a deadline for payment that Dolly did not comply with.⁷³

⁶⁸ See *general id.*

⁶⁹ See *generally id.*

⁷⁰ *Redline Courier*, 1994 Wash. UTC Lexis at *7.

⁷¹ See *generally* Decl. of Susie Paul.

⁷² See *generally id.*

⁷³ *Id.* at 3 ¶ 13, Attachment J at 5 ¶ 18.

29 From all that, a reasonable factfinder could reach only one conclusion—Dolly is not fit to hold operating authority issued by this Commission. Dolly has a history of knowingly, flagrantly, and repeatedly violating the public service laws and the Commission’s order to cease and desist. It has not paid the penalty the Commission assessed for the company’s violations of the public service laws. Dolly cannot offer credible assurances of future compliance given its refusal to take action to correct its noncompliance, a refusal that leaves the company with no changes to its operations that objectively manifest any intent to comply with regulatory requirements to support any assurances of future compliance that it might offer the Commission. Dolly is unfit to hold a permit as a matter of law.⁷⁴

30 Given Dolly’s lack of regulatory fitness, the Commission should grant this motion for summary determination and deny the company’s application for authority. As noted, Dolly bore the burden of establishing its fitness to hold the permits it applied for,⁷⁵ and its unfitness as a matter of law prevents it from carrying that burden. Dolly’s inability to carry its burden makes summary determination appropriate.⁷⁶

VII. CONCLUSION

31 The Commission should determine as a matter of law that Dolly is unfit to hold operating authority—there is no evidence that Dolly can offer that can create a material issue of fact in this regard given its refusal to comply with the public service laws and the

⁷⁴ *E.g.*, *Ruff v. King County*, 125 Wn.2d 697, 887 P.2d 886 (1995) (even ultimate questions not generally susceptible to summary judgment may be decided as a matter of law where reasonable minds can reach only one conclusion); *Hartley*, 103 Wn.2d at 775 (where reasonable minds can reach only one conclusion, ultimate question becomes one of law, not of fact).

⁷⁵ *Rainier Moving Co.*, Docket TV-160323, Order 01, at 3-4 ¶ 14.

⁷⁶ *Atherton Condo Ass’n*, 115 Wn.2d at 517.

Commission's orders in Docket TV-171212. Dolly's unfitness as a matter of law compels a grant of summary determination denying Dolly's application for operating authority.

Dated this 11th day of October 2018.

Respectfully submitted,

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