

Date Received: April 20, 1998

Docket No.: TV-971477

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

Distribution:

Chairwoman Levinson
Commissioner Gillis
Commissioner Hemstad
Marjorie Schaer, ALJ
Shirley Burrell (Rulemakings cover letters only & changes to NOH)
Penny Hansen
Teresa Osinski
Dixie Linnenbrink
Ann Rendahl, AAG
Vicki Elliott
Diana Otto
Paul Curl
Sally Turnbull
Linda Elhart
Foster Hernandez
Bonnie Allen
Cathie Anderson
Carlene Hughes
Kim Dobyms
Ray Gardner
Carolyn Caruso
Pat Dutton
Alan Dickson (mail)
Mary Sprouffske

For Records Center Use Only

RMS
FOB
PR _____
MSL _____
NOH _____
Disk _____
Initial

LAW OFFICES OF
DAVIS & BALDWIN
SUITE 1902 - IBM BUILDING
1200 5th AVENUE
SEATTLE, WA 98101
TELEPHONE (206) 624-7373
FAX (206) 622-3249

KEITH R. BALDWIN

JACK R. DAVIS
of Counsel

April 16, 1998

Washington Utilities and Transportation
Commission
1300 S Evergreen Park Dr SW
P O Box 47250
Olympia WA 98504 7250

Re: Household Goods Rule Making
Docket No. TV 971477

RECEIVED
PROPOSED MANAGEMENT
98 APR 20 AM 9:53
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Dear Acting Secretary Curl:

The following is a written list of questions that were submitted by Jack R. Davis, attorney for the Washington Movers Conference, to the Commission Staff at the workshop held on the above docket proceeding on April 14, 1998.

1. In respect to the proposed rules regarding entry, are they intended to implement RCW 81.80.070?
2. Does the Commission Staff propose to voluntarily apply the provisions of RCW 35.05.328 regarding significant legislative rules?
3. Are the specific objectives of these amendments to provide additional choices to the consumer?
4. What alternatives are available to achieve these goals?
5. Are the probable benefits of the proposed rules greater than the cost?
6. Are the proposed rules the least burdensome alternative to regulated industry?
7. What documentation is available to support these determinations?

000527

8. Have you formed an implementation plan?
9. Has any study been made regarding consumer complaints relating to existing rules?
10. Have you made any compilation of consumer complaints?
11. What choices are presently available to consumers in various markets in the State of Washington?
12. Are there any market areas that do not have choices?
13. What existing problems, if any, will be cured by easing entry requirements?
14. Who will benefit from reduced entry requirements?
15. Can existing problems, if any, be eliminated without reduced entry requirements?
16. How many qualified moving companies will be added by reduced entry requirements?
17. In what areas will those companies be added?
18. What impact will the addition of those companies have on any consumer problems presently existing?
19. What impact will those additions have on existing small businesses?
20. Are the existing tariff rates compensatory to carriers paying prevailing wage levels, including applicable employee benefits and withholding, such as workmens compensation, FICA, overtime, paid vacations, sick leave, and compliance with the ADA?
21. How will the Commission protect against predatory pricing under a minimum/maximum tariff arrangement?
22. What is the existing WUTC budget for enforcement of consumer complaints?
23. What impact will these proposed rules have on the WUTC budget for consumer protection?
24. During the twelve months of 1997 and the first three months of

1998, how many consumer complaints did the WUTC investigate involving household goods movements?

25. What were the nature of such complaints?

26. How many of such complaints resulted in a warning or penalty to the moving company?

27. Please identify the companies and the nature of the warning or penalty.

28. How will the Commission Staff determine appropriate "minimum rates"?

29. Will the measurement of appropriate minimum rates be based on the lowest cost carrier service included?

- a) Wage levels
- b) DSHS premium
- c) FICA
- d) Vacation pay
- e) Sick leave
- f) Safety training
- g) Safety appliance, such as back support

30. What impact will the minimum rate structure have on existing small businesses?

31. How will the WUTC staff enforce the minimum/maximum tariff provisions?

32. How will the Commission Staff enforce the binding estimate or not to exceed estimate provision?

33. How will the Commission Staff evaluate the impact of the proposed regulations?

- a) Before implementation
- b) After implementation

34. Has the Commission Staff made any study to obtain any statistics from consumers in respect to their satisfaction under existing rules and/or under the proposed revisions?

Washington Utilities and
Transportation Commission
April 16, 1998
Page 4

It is respectfully requested that responses to these questions be provided prior to or included in any proposal for final implementation of rule changes under Docket No. TV 971477.

Very truly yours,



Jack R. Davis

JRD/sj
cc Jim Tutton, Washington
Movers Conference
c:\wp51\jrd\wutcwmc.let

000530