



Washington Movers Conference

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WASH. UT. & TP. COMM

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James R. Tutton, Jr.
Executive Director

July 27, 2018

Mr. Mark Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Dear Mr. Johnson:

The Washington Movers Conference petitions the Washington Utilities and Transportation Commission for a change to WAC rules by moving the requirement, "*The applicant has attended a commission-sponsored household goods carrier training class.*", from WAC 480-15-305, Permanent Authority, and placing it in WAC 480-15-302, Provisional Authority.

The WMC has real concerns with the present rule, WAC 480-15-302, for granting of HHG Provisional Operating Authority. The WMC is not opposed to granting HHG Provisional Operating Authority, but rather the lack of training in WAC and HHG Tariff No 15-C rules and procedures prior to granting an applicant for HHG Provisional Operating Authority.

The present WAC rules mentioned are not good for either the consumer or the Applicant. The necessary training should take place before granting a Provisional HHG Operating Authority and allowing the new Applicant to begin operations.

Justification:

I was recently visited by a new moving company owner who had just received his Provisional HHG Operating Authority from the WUTC and was seeking guidance. Through our discussion, it was readily obvious to me the gentleman new nothing about operating an intrastate HHG moving company. Here are some his questions to me -

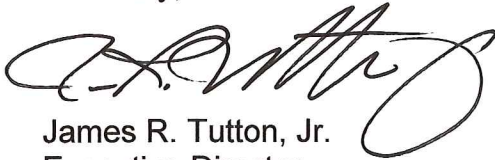
- a. How do I hire employees?
- b. Why is Background Screening of employees needed?
- c. What does an "*Estimated Costs for Services*" form look like?
- d. What is a "*Consumer Guide to Moving in Washington State*" and where do I get them?
- e. What is "Valuation"?
- f. There is a "*Uniform Household Goods Bill of Lading*" needed? (NOTE: He was on his way to Office Depot to purchase a pad of Invoices, so he could bill his customers!)
- g. How do I estimate the weight of the HHG shipment?
- h. What is the difference between a "Binding" and a "Non-Binding" Estimate?
- i. If I and my crew do the packing, can I charge for that work?

Allowing a new Applicant to begin operating with a Provisional Operating Authority without knowing the basics and understanding the proper regulatory WAC and Tariff No. 15-C rules puts the consumer in jeopardy for receiving a difficult moving experience and sets the Applicant up for failure and heavy penalties when contacted by the Commission's Compliance staff for audit.

The WMC is not opposed to new Applicants when armed with the basics and a general knowledge of conducting business as an intrastate HHG moving carrier.

Should you have any questions, please do not hesitate to contact me at (206) 499-9216 or jim@wmc movers.com.

Sincerely,



James R. Tutton, Jr.
Executive Director

cf:

Ms Bridgit Feeser, Assistant Director, Consumer Protection
Ms Suzanne Stillwell, Licensing Services Manager
Mr. Michael Turcott, Compliance Investigations Supervisor