



Washington Movers Conference

James R. Tutton, Jr.
Executive Director

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

July 19, 2019

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

Dear Mr. Johnson,

The Washington Movers Conference (WMC), on behalf of its regulated professional member moving and storage companies, Petitions the Commission for a formal change to the Rates and Charges contained in UTC HHG Tariff No. 15-C effective July 13, 2018.

The WMC has had several discussions this past year with UTC staff responsible for Tariffs and the compliance thereof seeking the best approach for raising Rates and Charges contained in UTC HHG Tariff No. 15-C that would be simple, accomplished at minimal cost to each party, and that would be fair to Washington's consumers seeking professional intrastate HHG moving services. As always, the strong consumer protections in place in WAC 480-15 and the UTC Household Goods Tariff No. 15-C would remain.

The currently mandated not to exceed Minimum/Maximum Rate HHG Tariff No. 15-C, is no longer compensatory for regulated moving & storage companies, who's revenue is based on HHG moving and storage work performed. Presently, intrastate moving & storage companies are forced to absorb additional business costs implemented at the City, County, or at the State level. Recent examples include the recently instituted employee minimum wage levels; higher taxes randomly implemented at any given government level; new State Agency employment programs such as the new Mandatory Paid Family and Medical Leave Program and the soon to be new Employee Mandatory Overtime rule; City Truck Parking fees, increasing highway and bridge tolls, and the obvious – roadway congestion in metropolitan areas throughout the State. For Intrastate moving Companies, time is money and while sitting in endless congestion, the costs just keep adding up; namely fuel and employee costs!

Following much discussion at the July 11, 2019 WMC Board of Directors meeting, the action the Board chose for relief from non-compensatory rates and fees is to Petition the UTC for the removal of the "Maximum Rate Band" from the UTC HHG Tariff No. 15-C but maintain a reasonable Minimum Rate Band whereby intrastate moving companies could charge no less by low balling rates and charges and then seeking additional payment at time of delivery.

The WMC Petition along with the solid consumer protections already in place would –

- a. Allow regulated intrastate HHG moving companies to charge rates and fees acceptable to consumers that will be compensatory based on the general area within

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Washington in which they operate including the Mileage Rates for in-state long distance HHG moves which have been non-compensatory for years.

- b. Eliminate for the need for annual UTC HHG Tariff No. 15-C rate studies.
- c. Continue to provide the consumer with solid Consumer Protection whereby the consumer must agree to offered moving and storage rates and fees by agreeing to and signing the moving company's completed Intrastate Estimated Costs for Services following a visual review of their goods to be moved prior to the start of the move.
- d. Ensure changes to the Estimated Costs for Services requested by the consumer, which would add or delete items to be moved during the moving process, to be mutually agreed to by both parties by way of a signed Supplemental Estimated Costs for Services.
- e. Provide regulated HHG moving and storage companies the flexibility to adjust to operational cost increases imposed at the State, County, and City level governments.
- f. Provide regulated moving companies the ability to implement regular vehicle and equipment replacement targets to insure safe operations on Washington's highways and protection of consumers goods.
- g. Provide regulated moving companies the ability to pass along fuel increases and likely State imposed carbon fuel taxes and/or conversions to alternate fuel vehicles as they become required.
- h. Provide regulated moving companies the ability to pay their employees a reasonable family wage thereby maintaining an adequately trained work force. .

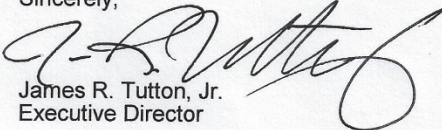
In other words, HHG moving companies would be able to properly manage and operate their businesses to satisfactorily meet their needed operating ratios for growth and success, plus meet the safe and efficient demands of their customers and the protection of the customer's goods and dwellings.

In addition, ITEM 155, Paragraph 8, needs to be removed from the HHG Tariff No. 15-C. The regulated professional intrastate moving company should not be penalized for actual work performed.

Thank you for your consideration of this Petition.

For questions, I may be reached at (206) 499-9216.

Sincerely,


James R. Tutton, Jr.
Executive Director