



Washington Movers Conference

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James R. Tutton, Jr.
Executive Director

April 9, 2020

Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Dear Sir:

In accordance with RCW 34.05.240, the Washington Movers Conference petitions the Utilities and Transportation Commission (UTC) for a Declaratory Order to determine if it is allowable within UTC WACs that a UTC Permitted intrastate HHG moving company can legally contract out their moving services to a third party such as –

- a. Contracting with a third party for the services of a work crew(s) to pack/unpack their customers HHG?
- b. Contracting with a third party for the services of a work crew(s) to load/unload their customers HHG to the permitted moving company's commercial truck for pick-up/delivery?
- c. Contracting with a third party for the services of a commercial truck driver with a commercial truck and work crew to pick-up/deliver the HHG for the permitted moving & storage company's customers?

If such is allowable, this would be a way for properly regulated intrastate moving & storage companies to absolve themselves from paying Unemployment Benefit Premiums and Workers Compensation Premiums to the Employment Security Department and the Department of Labor and Industries because they would have no employees. Not a good plan!

It is the WMC's concern since the UTC regulates intrastate HHG moving companies, that they must ensure a level playing field for all.

I am available for questions/comment regarding this Petition. Telephone: (206) 499-9216


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