

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation of

FOUR SEASONS MOVING &  
STORAGE LLC,

For Compliance with WAC 480-15-560  
and WAC 480-15-570.

DOCKET TV-220338

NOTICE OF INTENT TO CANCEL

NOTICE OF BRIEF ADJUDICATIVE  
PROCEEDING; SETTING TIME  
FOR ORAL STATEMENTS  
(Set for June 22, 2022, at 1:30 p.m.)

- 1 Pursuant to RCW 81.80.130, the Washington Utilities and Transportation Commission (Commission) regulates the safe operation of motor freight carriers, including household goods carriers.
- 2 Four Seasons Moving & Storage LLC, (Four Seasons or Company) engages in business as a household goods carrier under Commission-issued provisional permit number THG-069635.
- 3 Between April and May 2022, the Commission’s staff (Staff) reviewed Four Seasons’ compliance with the requirements of Washington Administrative Code (WAC) 480-15-560 and WAC 480-15-570, which adopt, among other provisions, Title 49 of the Code of Federal Regulations (C.F.R.) Parts 391, 392, 395, and 396. Staff also reviewed the Company’s compliance with WAC 480-15-550 and WAC 480-15-555.
- 4 In May 2022, Staff completed an investigation of Four Seasons’ compliance with the safety requirements in WAC 480-15. As a result of the compliance investigation, Staff documented 68 violations of Commission rules, including 37 acute or critical violations.<sup>1</sup> On May 11, Staff notified the Company that the investigation resulted in a proposed unsatisfactory safety rating based on the acute and critical violations discovered and provided the Company a copy of the investigation report.
- 5 A carrier may request a change in its safety rating based on evidence that it has taken corrective actions to address the identified violations and that company operations currently meet the safety fitness standard specified in 49 C.F.R. § 385.5 and § 385.7.

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<sup>1</sup> An acute violation is a violation of a regulation where “noncompliance is so severe as to require immediate corrective actions by a motor carrier regardless of the overall safety posture of the motor carrier.” 49 C.F.R. Part 385, Appendix B.II.b; WAC 480-15-560; WAC 480-15-570; WAC 480-14-999. A critical violation is a violation of a regulation where “noncompliance relates to management and/or operational controls. These are indicative of breakdowns in a carrier’s management controls.” 49 C.F.R. Part 385, Appendix B.II.c; WAC 480-15-560; WAC 480-15-570; WAC 480-14-999.

- 6 The Commission will grant permanent operating authority to a carrier that successfully completes its provisional period. Successful completion requires, among other things, that the carrier receives a satisfactory safety rating based on a review conducted by Staff.<sup>2</sup> If a carrier fails to receive a satisfactory safety rating within 18 months of obtaining its provisional permit, the Commission will cancel the carrier's provisional permit and dismiss the company's application for permanent authority unless the Commission finds good cause to extend the provisional period. WAC 480-15-305(3).
- 7 The Commission will afford Four Seasons an opportunity to provide evidence, in the form of an approved safety management plan, showing that it has taken corrective action to address the identified violations. Four Seasons must come into compliance with applicable laws by obtaining a Commission approval of a safety management plan no later than July 8, 2022. If the Company fails to come into compliance by that date, the Commission will cancel its household goods carrier permit effective July 11, 2022. Thereafter, as an unregistered company, Four Seasons would be prohibited from providing household goods carrier services in the state of Washington.
- 8 **THE COMMISSION GIVES NOTICE That it intends to cancel the permit and authority of Four Seasons to provide services as a household goods carrier effective July 11, 2022, for cause, following a hearing on the factual allegations set out above, unless Four Seasons obtains Commission approval of a safety management plan prior to that date.**
- 9 Pursuant to RCW 34.05.482 and WAC 480-07-610, the Commission schedules a hearing on its own initiative and determines that a brief adjudicative proceeding is appropriate to determine whether the Commission should cancel Four Seasons' household goods carrier permit.
- 10 **THE COMMISSION GIVES FURTHER NOTICE That it will hold a virtual brief adjudicative proceeding in this matter at 1:30 p.m. on June 22, 2022. To attend the hearing by telephone, please call (253) 215-8782 and enter the conference ID: 892 2020 2676# and the Passcode: 352503# . To participate via Zoom, please use the following link: [Click here to join meeting](#).**
- 11 The record in this case will consist of any documents regarding the matter that are considered by or prepared for the presiding officer for the brief adjudicative proceeding and a transcript of any oral statements given at the hearing, which statements will be given under oath.
- 12 Written notice of any other stage in the proceeding or other formal proceedings that the

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<sup>2</sup> WAC 480-15-305(1)(e).

Commission may deem appropriate will be given during the course of this case. Such documents are available on the Commission's website, [www.utc.wa.gov](http://www.utc.wa.gov). The Commission will provide at its offices in Lacey, Washington, copies of documents in the current record for use by the parties or others who may want to review them.

- 13 Four Seasons must submit its proposed safety management plan no later than 5 p.m. on June 8, 2022.** Parties wishing to submit any other documents for consideration at the brief adjudicative proceeding must file with the Commission a list enumerating and describing any such documents **no later than 5 p.m. on June 15, 2022**, and provide any such documents to Staff counsel and the presiding officer by email **by 5 p.m. on June 15, 2022**.
- 14 THE COMMISSION GIVES NOTICE that any party who fails to attend or participate in the brief adjudicative proceeding set by this Notice, or any other stage of this proceeding, may be held in default under RCW 34.05.440 and WAC 480-07-450.**
- 15** The names and mailing addresses of all parties and their known representatives are shown as follows:

Commission: Washington Utilities and Transportation  
Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

Representative: Harry Fukano  
Assistant Attorney General  
P.O. Box 47250  
Olympia, WA 98504-7250  
(360) 664-1225  
[harry.fukano@utc.wa.gov](mailto:harry.fukano@utc.wa.gov)

Respondent: Anne De Santis  
Owner  
21902 56th Ave W #A1  
Mountlake Terrace, WA 98043  
206-734-2398  
[fourSmoving@gmail.com](mailto:fourSmoving@gmail.com)

16 Administrative Law Judge Gregory Kopta, from the Commission's Administrative Law Division, will preside during this proceeding.<sup>3</sup>

DATED at Lacey, Washington and effective May 26, 2022

WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

AMANDA MAXWELL  
Executive Director and Secretary

Inquiries may be addressed to:

Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250  
(360) 664-1160

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<sup>3</sup> Judge Kopta can be reached by email at [gregory.kopta@utc.wa.gov](mailto:gregory.kopta@utc.wa.gov) or by phone at (360) 664-1135.

**NOTICE**

Hearing facilities are accessible to persons with disabilities and persons who do not speak English as a first language. If limited English-speaking or hearing-impaired parties or witnesses are involved in a hearing and need an interpreter, a qualified interpreter will be appointed at no cost to the party or witness.

If you need an interpreter, or have other special needs, please provide the information requested below via email to Paige Doyle, paralegal, at [paige.doyle@utc.wa.gov](mailto:paige.doyle@utc.wa.gov).

(PLEASE SUPPLY ALL REQUESTED INFORMATION)

Docket: \_\_\_\_\_

Case Name: \_\_\_\_\_

Hearing Date: \_\_\_\_\_ Hearing Location: \_\_\_\_\_

Primary Language: \_\_\_\_\_

Hearing Impaired: (Yes) \_\_\_\_\_ (No) \_\_\_\_\_

Do you need a certified sign language interpreter:

Visual \_\_\_\_\_ Tactile \_\_\_\_\_

Other type of assistance needed: \_\_\_\_\_