

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

PROOF OF SERVICE

DOCKET NO. TV-971477

KNOW ALL PERSONS BY THESE PRESENTS That the undersigned, an employee of the Washington Utilities and Transportation Commission at Olympia, Washington, hereby certifies that a copy of the document referred to below was served on the parties of record in said proceeding in the following manner:

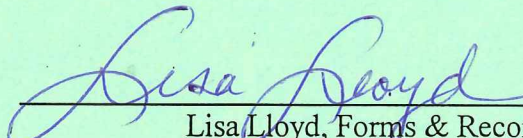
On the 6th day of March, 1998, a true copy of PATSY DUTTON LTR. TO JOE HARRISON, AMERICAN MOVING & STORAGE ASSOCIATION, RE: COMMENTS SUBMITTED ON JANUARY 23, 1998.

in the above-entitled cause now pending before the Commission was enclosed in an envelope addressed to each of the parties of record as set forth below. Each envelope was addressed to the address shown in the official files attached hereto, sealed with the required first-class postage thereon, and deposited on said date in the United States mail in the City of Olympia, County of Thurston, State of Washington.

PARTIES OF RECORD AND OTHERS RECEIVING NOTICE

JOE HARRISON
ANN RENDAHL, AAG

REGULAR IN-HOUSE DISTRIBUTION:
SEE ATTACHED



Lisa Lloyd, Forms & Records Analyst 2

000386

FORMAL TRANSPORTATION ORDERS & LETTERS

Date served: March 6, 1998

Docket No: TV-971477

Document: Patsy Dutton Letter to Joe Harrison, RE; Comments submitted on January 23, 1998.

- Final Transp. Subscription
- ALJ assigned? if no, 1 copy to LAPD
- Public Affairs
- Gene Eckhardt
- Vicki Elliott
- Consumer Affairs assigned
- Field
- Rachel Porter
- Marci Knies
- Bonnie Allen
- Lead & Team
- Dixie Linnenbrink

Kim Debyas
Teresa Osinski
Diana Otto

Carolyn Caruso
Ray Gardner
Foster Hernandez

10-06-95

Sally Turnbull
Alan Dickson

- Pat Dutton
- ~~Alan Scott~~
- Penny Hansen
- Comm. AAG's (2 copies if final)
- Policy Planning
- Cathie Anderson
- Paul Curl
- Bob Colbo (No Railroad)
- Bob Boston
- Shirley Burrell (Initial and Final Orders ONLY)
- Financial Services (Instituting Invest. only or Penalty Assessment)



SERVICE DATE

MAR 06 1998

STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 753-6423 • TTY (360) 586-8203

March 6, 1998

Mr. Joe Harrison, President
American Moving and Storage Association
Household Goods Carriers' Bureau Committee
1611 Duke Street
Alexandria, Virginia 22314-3482

Dear Mr. Harrison:

Thank you for your January 23 letter along with a copy of your comments to the California PUC regarding Shurgard Storage Company. We have also received your comments regarding the household goods rulemaking, Docket No. TV-971477.

Commission staff discussed with several parties the issues you raise in your letter regarding Shurgard Storage. The position upon which we provided information to those parties related only to regulation of loads transported in Washington intrastate commerce and was based solely on interpretation of our current rules. We did not imply that the interpretation was valid in interstate commerce or on operations conducted in any state other than Washington.

Our rules define transporters of household goods as carriers who provide specialized services and use specialized equipment. The scenarios described to us by Shurgard Storage representatives did not include either provision or specialized service nor the use of specialized equipment. Therefore, the operations in Washington are not classified as transportation of household goods. The operations are only regulated under our existing laws and rules relating to general commodity carriers.

As you are aware, we are currently in a proceeding which is reviewing Washington rules relating to the regulation of transporters of household goods. Included in this rulemaking is amendment of the definition of "transporters of household goods". The committee working on the rulemaking was given a copy of your letters and supporting documents. A copy was also placed in the official rulemaking file. Staff placed your name on the interested parties list for the rulemaking. As a result, you will receive copies of documents generated on the rulemaking. We welcome your organizations continued participation in the rulemaking process.

