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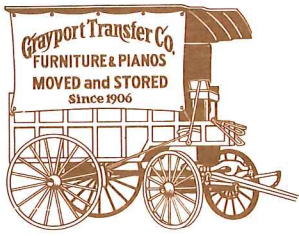
Company: Amends WAC 480-12, Relating to Household Goods Movers

Distribution:

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Commissioner Gillis
Commissioner Hemstad
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Grayport Transfer & Storage Co.

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TV 971477

February 20, 1998

Ms. Pat Dutton, Program Development
Transportation
WUTC
PO Box 47250
Olympia WA 98504-7250

RECEIVED
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98 MAR -3 AM 11:25
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Dear Ms Dutton,

I would like to introduce to you Grayport Transfer and Storage Co., Inc. Our company is a small, full service moving and storage company located in southwest Washington. The company was founded in 1906 and still in business today thanks in large part, to regulation.

Grayport Transfer serves southwest Washington from Ilwaco to the south, Neah Bay to the north and McCleary to the east. This area encompasses small towns such as Forks, Quinalt, South Bend, Nasselle, Tokeland and other specs on the map.

Currently, under regulation, the residents of these areas receive the same level of service and pay the same rates as that of an Olympia area resident although travel time to the job site can easily be two hours one way. I question if residents would receive the same levels of service and pay the same price under deregulation or different rate structures. Currently we are paid for services we perform, no more, no less. This system is fair to the customer and the company alike no matter what the shipper's address is.

My business, as all moving companies currently under regulation, has been built around rates that have been set by the State of Washington. Salary levels, benefits, equipment and insurance, are all attached to these rates in one form or another. The moving industry is a seasonal employer. Our company works hard to keep qualified people during the slow periods by finding "busy work" for them to do so that they are around during the pressure months. We at Grayport Transfer have office personnel and drivers with over fifteen years of service. These people raise families, pay taxes, and are not laid off during slow periods.

Maintaining current policy and procedure is vital to these employees' careers and vital to our local economy. In Aberdeen we have many slow days because we don't have the population base or corporate structure to draw from. We want to keep our qualified movers and other personnel, but will only be able to do so provided we have a tariff structure in place that is fair for all and maintains current rates and procedures. Competition based on rates is counter-productive.

Do you know what happens to old U-haul and Ryder trucks placed out of service? With open entry into the moving industry these trucks, based on fit, willing, and able, will overnight become Sanford & Son moving trucks. Will these trucks be insured, maintained and inspected for safe highway operation? Remember, these were placed out of service and up for sale. What about cargo liability, drug and alcohol testing for drivers, percentage of revenue to Washington state and a telephone that someone actually answers for shippers questions? Will the WUTC have the personnel or funds to enforce "fit, willing and able" when the number of companies increases?

The system currently in place of permitted household goods movers is the best safeguard the moving public has. The Washington moving public has a right to experience safe operation and professional business people.

The consensus by some is that Washington intrastate household goods permits are unobtainable and limit entry into the industry. I have never protested the application of an experienced moving company who has demonstrated their knowledge of the law as it pertains to operating a moving company and has the necessary insurance, equipment, and licenses required to do business in this state. I witnessed the most bizarre waste of taxpayers' money and time with the application hearing of "Mike the Mover, on May 22nd, I believe in 1994. I might suggest you obtain a copy of the transcripts. To this day, I cannot believe he is allowed to continue to operate outside the law. I truly believe that people like Mr. Mover prefer to operate outside of the law and do not want to buy a permit or go through the process. These operators want, by the stroke of a pen, what all legitimate household goods permit holders, including myself, have spent thousands of dollars on. Illegal movers that currently operate outside of laws, rules and regulations will continue to operate in that method with no regard to the circumstances or policies. A leopard cannot change its spots. Will enforcement currently handled by WUTC change hands to the department of revenue as unemployment, business and other taxes are not paid? If so, fit, willing and able takes on a whole new dimension. Look through local phone books of selected cities and you'll find that in many cases the adds for illegal movers far outnumber legal movers. To me this reflects sub-standard enforcement or no enforcement by the WUTC. The law currently reads that we must use our WUTC permit number in all advertisements. I believe there should be a law forbidding phone book publishers from accepting advertisement for household goods moving without a documented WUTC permit.

Aberdeen, where Grayport Transfer is located, is one of those communities outlined in the Governor's urban development plan. We need quality jobs with quality people. Grayport Transfer & Storage provides our local community and the state of Washington great service with trained, professional office personnel and movers. This fact is evident in that Grayport Transfer & Storage has never had a claim for loss or damage filed with it's insurance carrier. We do not have more work than we can handle in Aberdeen. Our situation is just the opposite, we can handle more work than we have. Regulation is something we need to survive, it's that simple!

Sincerely,


P. Alan Purkey,
President