

VIA FAX

Date Received: August 4, 1998

Docket No.: TV-971477

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

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1201 3rd Avenue, Suite 2200
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August 3, 1998

Mr. Paul Curl
Acting Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504
Attn: Kim Dobyns

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Re: TV-97 1477: Household Goods Rulemaking
Draft 4C-Household Goods Definition

Dear Mr. Curl:

I have just received and reviewed Household Goods Rulemaking Docket No. TV-971477, July 15, 1998 Draft 4C. I was pleased to see the proposed definition of household goods found at proposed WAC 480-15-020(11). Specifically:

Household goods, when the term is used in connection with transportation, means personal effects and property used or to be used in a residence when it is part of the equipment or supply of such residence, and is transported between residences or between a residence and a storage facility with the intent to later transport to a residence. This term excludes transportation of customer packed and sealed self-storage type containers when no accessories services are provided by the carrier in connection with the transportation of the container.

As Division Counsel for Shurgard Storage To Go I have attended several of the drafting sessions involving the above referenced rulemaking. The above definition was fully discussed at these sessions, with all interested parties given ample opportunity to participate. While there was some debate as to the proposed exclusion for transportation of containerized goods, Shurgard supports the staff's proposal as legally correct and consistent with long standing opinion and case law of both the Washington Utilities and Transportation Commission and the Interstate Commerce Commission.

001017

I would like to thank the staff for their careful consideration of this issue, and offer Shurgard's support of the adoption of the definition of household goods as set forth in Draft 4-C of Household Goods Rulemaking Docket No. TV-97147.

Sincerely,



Christine Mullaney McKay
Division Counsel

August 3, 1998

Mr. Paul Curl
Acting Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504
Attn: Kim Dobyms

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001015

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Sincerely,



Christine Mullaney McKay
Division Counsel