

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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Williams, Kastner & Gibbs PLLC

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VIA FACSIMILE AND U.S. MAIL

August 4, 1998

78545.100

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Dr. S.W.
Olympia, WA 98504
Attn: Pat Dutton

Re: Household Goods Rulemaking, Docket No. TV-971477

Dear Ms. Washburn:

On behalf of Door to Door Storage, Inc., this is to thank the Staff of the Washington Utilities and Transportation Commission for their work during this protracted rulemaking and the series of four or more stakeholder meetings that have been convened since January regarding some very significant changes to the regulations for residential household goods carriers in the state of Washington.

As I indicated in my previous letter to the Commission in February 1998, we have been concerned about the apparent expanding definition of household goods as previously proposed in WAC 480-15-020.

As I review the latest draft dated July 15, 1998, and the definition of household goods at page 2, we strongly support the definition as currently set forth at lines 175 through 180 on page 2 of Proposed WAC 480-15-020, defining "household goods" as the following:

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 a part of the equipment or supplies 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 assessorial services are

Ms. Carole J. Washburn
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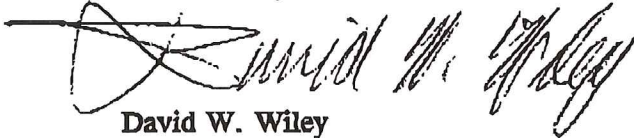
provided by the carrier in connection with the transportation of the container.

We believe this position is consistent, not only with previous federal law interpretation of self-service storage containers and economic regulation thereof, but also with previous definitions of household goods under current Commission regulation at 480-12-400 and 480-12-990 (2). It is also in keeping with the Governor's executive order on agency rule review and avoids construction of additional regulatory hurdles for the evolving intrastate storage and transportation industry.

Again, we thank the Commission Staff for the considerable investment of time and resources in readying this rulemaking for Commission notice, and invite you to contact us should you have any further questions with respect to our support of the above definition.

Yours truly,

WILLIAMS, KASTNER & GIBBS PLLC



David W. Wiley

DAV:psb

cc: Door to Door Storage, Inc.

David W. Wiley
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(206) 233-2895
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RECEIVED
STAFF OF THE
WASHINGTON UTILITIES
AND TRANSPORTATION
COMMISSION
1998 AUG -5 PM 9:31
OLYMPIA, WA

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Handwritten initials/signature

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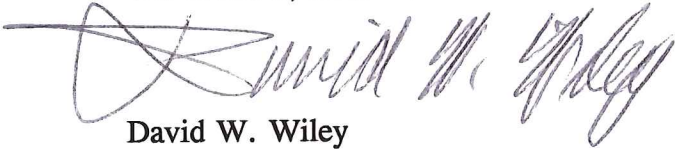
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Yours truly,

WILLIAMS, KASTNER & GIBBS PLLC

A handwritten signature in cursive script, appearing to read "David W. Wiley", is written over the typed name.

David W. Wiley

DAV:psb

cc: Door to Door Storage, Inc.